

1 people that have opinions that I believe aren't well
2 founded.

3 Q And that would be people on my side of the
4 table?

5 A That's yet to be seen. We haven't been to
6 court yet.

7 Q All right. Now talking about small businesses
8 versus large corporations would you agree that a small
9 business the size Imbergia Paving would be unlikely to
10 have industrial hygienists on staff?

11 A I think that's true.

12 Q And they would be largely dependent on
13 information provided to them by their material
14 suppliers for information regarding potential hazards
15 of those materials?

16 A Either the material supplier in one form or
17 another, in this case you'd either have the brake box
18 or you'd have the service manual.

19 Q Okay. With regard to your 2003 paper --

20 A And by the way, at this time frame he should
21 have had exposure to both. He should have had warnings
22 both the through brakes and service manuals.

23 Q If you bought the vehicles used would you have
24 to ask the manufacturer for the service manual if the
25 person you bought it from did not have it?