

1 A Now these questions are all between 1978 and
2 1985.

3 Q That's correct, and I'd like you to assume so
4 that we can continue, that all the brake pads that
5 we're talking about have asbestos in them. For
6 example, would loosening the lug nuts of the wheel and
7 taking the wheel off have a potential for exposure to
8 airborne asbestos?

9 MR. LANKFORD: Incomplete hypothetical.

10 THE WITNESS: I'm not sure about that. I'm not
11 sure you'd be able to measure anything.

12 BY MR. RUCKDESCHEL:

13 Q Have you seen documents or studies that have
14 discussed that as a potential avenue for exposure?

15 A I'm not sure that I remember anybody
16 specifically talking about that task. You could infer
17 or assume there was some potential exposure but it's
18 not something that we focused on.

19 Q Okay.

20 A "We" meaning the scientific community.

21 Q I understand. And then if we move forward,
22 the drum is removed and cleaned out; is that correct?

23 A If it's a drum brake, yes, sir.

24 Q And I want to confine our discussion here to
25 drum brakes today. And the drum is then cleaned?