

1 some on our own, which we did.

2 However, Dr. Millette was not able to test
3 just the Ford brakes in March. We were waiting for
4 all of the defendants to produce brakes so he could do
5 one test on all of the brakes when he received them.

6 Not only that, he didn't have time in March
7 at the time of the production of the brakes to us from
8 the other plaintiff's firm.

9 We relied on Ford's representation that they
10 didn't have any brakes, so we got pads from another
11 counsel.

12 And then, on April 30th, I believe it is,
13 after Your Honor had the second hearing on our motion
14 to get the other defendants to produce, on April 30th,
15 the corporate representative for Allied-Signal was
16 deposed by us and he said to us that they were
17 currently still supplying Ford with
18 asbestos-containing brakes, to our surprise.

19 So shortly thereafter I personally went down
20 to a local Ford dealer and, sure enough, they had lots
21 of asbestos brakes made by Ford. And I purchased a