

1 not that one.

2 Q But certainly not the specific one that he
3 worked at; is that correct?

4 A Sure.

5 Q You are not aware of what the dust levels
6 were whatsoever at the two garages he worked at in
7 Baltimore?

8 A Not specifically those locations.

9 Q Now, I just want to make sure, just in
10 summarizing a couple of things that we have gone over,
11 because I have tried to go over them rather quickly,
12 would you agree with me that, in the 1940s and the
13 1950s, that all brakes that were used on passenger
14 vehicles and light trucks contained chrysotile
15 asbestos?

16 A That would be essentially correct, yes.

17 Q And just in summary, would you agree, which
18 is what I think you have said earlier, that all of the
19 original equipment in passenger cars and trucks during
20 the '40s and the '50s would be replaced with asbestos-
21 containing brakes?