

1 But based on what I know, it should apply to
2 virtually everyone. That is to say, any reasonable
3 number of brake changes in a career.

4 Q Are you familiar with Mr. Mallia's testimony
5 regarding the number and frequency of brake repair
6 work --

7 A Yes.

8 Q -- that he performed during his lifetime?

9 A Yes, I'm familiar with that.

10 Q Do you question the veracity of that
11 testimony?

12 A Well, it's inconsistent so I have to question
13 the veracity of it.

14 Q Okay.

15 A At some point he and his brother say thousands
16 and it can't be thousands when you work out the math.
17 And then later he says, you know, it's so many times
18 per week or per day. You know, ultimately I try to
19 infer that, what I could from the testimony, and it
20 looked like if he did what he said he did, I would say
21 he would fit in with the kind of people that were
22 described in my 2003 paper.

23 Q The data that goes into the 2003 paper upon
24 which the average exposure that you calculate, were the
25 individuals that were performing the work that form the