

1 Q Now have you asked Ford or General Motors or
2 Chrysler how many prior claims they have had where
3 individuals with mesothelioma with no other known
4 exposure to asbestos brought lawsuits against them?

5 A I've not asked that question.

6 Q Why not?

7 MR. LANKFORD: Calls for speculation.

8 JUDGE KLINE: If he knows why not.

9 BY MR. RUCKDESCHEL:

10 Q No, I'm just asking why he hasn't asked.

11 A Well, what you're asking is why haven't I asked
12 them to do some sort of mini epi study to refute what
13 Lemen and Engleman claim must be occurring because they
14 think that there are too many meso cases for the number
15 of brake mechanics that are alive. And if you add up
16 all the plaintiffs' cases they believe that the math
17 doesn't work. That's really what you're asking me.

18 Q Well, that is sort of the substance of what
19 I'm getting at, is one could go back and look through
20 the materials that were collected in litigation from
21 prior cases.

22 A That's right, you could.

23 Q And there's recent paper that was published
24 regarding household mesothelioma where the author,
25 Albert Miller -- and I'll mark it as Exhibit 8 since