

1 A That's true.

2 Q And we don't know whether they did brake work
3 or not?

4 A I suppose that's true.

5 Q For any of the individuals that were grouped
6 into that category, garage workers?

7 A You have to infer in most of these studies they
8 did brake work or were overexposed to brake dust.

9 Q That's an assumption that you make?

10 A I think you have to, yeah.

11 Q You have to if you want to rely upon the
12 study, right?

13 A Sure.

14 Q If you don't make that assumption then the
15 study doesn't really tell us anything, does it? With
16 regard to the question.

17 A If they were misclassified where they never
18 really did brake work and they said they did, then the
19 study would have errors in it.

20 Q In the McDonnell study, for example, they
21 didn't ask people whether they worked on brakes, they
22 just said do you work in a garage?

23 A That's right.

24 Q And for the Spirtas study they classified
25 people as having performed brake lining installation,