

1 that Ford included any language in its shop
2 manuals with regard to health hazards
3 associated with asbestos?

4 A No.

5 Q Why is that?

6 A Because the shop manuals would
7 usually deal with every vehicle line for ever
8 model year, and I guess this is talking about
9 going back to 1950. And I don't see anything
10 newer than 1970, so there's a couple decades
11 missing.

12 And I don't know what they said in
13 that, and then I'm not sure this is all
14 inclusive for all shop manuals for all vehicle
15 lines from 1950 on. I'm sure it's not because
16 it's doesn't start until 1970, or at least the
17 index doesn't start until 1970.

18 So some of them are in here.

19 Probably not all of them.

20 Q Okay. Getting away from that
21 document there, in the documents that have been
22 produced to you, have you been given all of the
23 shop manuals that reference, reference
24 asbestos?

25 A I doubt it.