

1 A Basically daily.

2 Q So at least once each day you would change
3 brakes or clutch facings?

4 A Yes.

5 Q How much of your time would have been spent
6 working around brakes or actually changing brakes or
7 clutches?

8 A Depending on the product, the brakes I would
9 say two hours at the most, and the clutch may take you
10 four to six hours changing it depending on the model.

11 Q As an apprentice, would you have to remove
12 old brakes and clutch facings as well as install new
13 ones?

14 A Yes.

15 Q When you were removing old brakes, what part
16 of the brakes is it that you believe contained
17 asbestos?

18 A The lining part themselves.

19 Q When you removed old brake linings, were you
20 able to determine who the manufacturer of those old
21 brakes were?