

1 Q Is it your opinion, though, that the tests
2 were scientifically valid?

3 A Yes, I believe so.

4 Q And these tests were performed on new brake
5 shoes, so we are clear, not on the brake wear dusts
6 that would occur when brakes were used and worn down?

7 A That is correct.

8 Q Now, based on your experience and training
9 and knowledge, Doctor, do you have an opinion, with a
10 reasonable degree of scientific certainty, whether the
11 sanding, sweeping, filing and grinding operations that
12 you performed on the Ford brakes released significant
13 levels of asbestos fibers into the ambient air?

14 MR. WILLIAMS: Objection.

15 THE COURT: Overruled.

16 A Yes, I do.

17 Q And do you consider those levels high enough
18 that precautions are necessary?

19 A Yes, I would think so.

20 Q And, again, Doctor, based on your
21 experience, training and knowledge, do you have an