A Yes. Having friction is sort of like clapping hands. One piece isn't enough to work.

You have to have a brake lining and a brake drum or a brake lining and a brake disc to generate friction.

Q I think you testified earlier that during your research at Ford you actually researched the manufacture and composition of friction products such as these; is that right?

A That is correct.

Q Okay. During your career at Ford, can you tell the jury what raw materials were used to make brake linings and brake pads?

A In the 1950, 1960, 1970s?

Q Sure. If there is a difference, why don't we start in about 1950 and go forward.

A Okay. 1950 we had nothing but drum brakes used on cars. The typical brake lining at that time period consisted of about 40 to 50, sometimes 55 percent of chrysotile asbestos, sometimes called white asbestos.