

1 exposed.

2 Well, how is it that Mr. Grewe gets exposed
3 to asbestos?

4 Ladies and gentlemen, you heard he was a
5 brake mechanic or, excuse me, a mechanic, and, of
6 course, as any good mechanic, he is going to do brake
7 jobs and in the '40s, '50s, '60s, '70s, when a
8 mechanic was doing brake jobs, he was getting exposed
9 to asbestos and that is what happened to Mr. Grewe.

10 Now, he didn't start working at Foreign
11 Motors until 1957, so that is kind of late, but that
12 is a date to focus in on. 1957 Mr. Grewe is going out
13 and working at Foreign Motors.

14 At Foreign Motors, Mr. Grewe was a --
15 obviously, as I said, a mechanic and, therefore, he
16 did a lot of brake jobs.

17 Now, how in the world do you get exposed to
18 asbestos dust, asbestos fibers when you are doing a
19 brake job?

20 Well, once again, if it is going in, if it
21 is going in, Ford Motor Company will admit that their

1 You blow the dust. You blow the dust, visible dust
2 that you see right there. And if it goes in when you
3 are making it, it is sure coming out when you are
4 blowing it.

5 That is what Mr. Grewe did for a living.

6 Not just that. He didn't just do brake jobs
7 24 hours a day, but think over all of those years how
8 many brake jobs Mr. Grewe did. Just think about it.

9 It was a very popular thing to do back in
10 that time period was to use an air hose to clean off
11 the wheels and the brake dust so you could then work
12 on the car and put new linings on. That is something
13 that Mr. Grewe did for a living.

14 Now, is that the only way you get exposed to
15 asbestos as a brake mechanic, as a person who works on
16 brakes? No, that is not the only way.

17 In fact, I must tell you, the dust that you
18 saw there is not all asbestos dust. We can concede
19 that. We concede that. It is not all asbestos dust.

20 There is dirt in there, other things in
21 there. You may hear oh, by the time he gets to that

1 brake linings that they produced -- that they put
2 their name on the boxes and shipped out for men like
3 Mr. Grewe to use, they will admit that their brake
4 linings contained 40 to 60 percent chrysotile
5 asbestos. Disc pads, 40 to 60 percent chrysotile
6 asbestos.

7 It is not going to be a dispute. It was
8 there. It was there.

9 Now, how does he get exposed? Well, there
10 are a couple of ways to get exposed.

11 The first way, ladies and gentlemen, is when
12 you are doing a brake job. A car comes in, Mr. Grewe
13 is going to work on the car and he is going to do a
14 brake job, and I don't know if a lot of you have ever
15 seen this and I hope you can see it because I had
16 trouble with the video earlier today, but basically
17 what would happen is that you take the tire off, you
18 take the wheel off. And you got to work on a clean
19 surface, so back in the '50s, '60s and early '70s, as
20 you are taking the wheel off -- you see that dust?

21 You take an air hose and what do you do?

1 point, all of the asbestos dust is gone.

2 Well, you listen to the evidence, and you
3 decide at the end of the case if all of it is gone.

4 There is another way to get exposed to
5 asbestos when you are a brake mechanic, and Mr. Grewe
6 got exposed in that fashion, too.

7 That is when you go back, and I don't know
8 how many of you have ever done brake jobs, but when
9 you go back to put a new brake lining on, it has to
10 fit.

11 It has to fit, and, of course, not
12 everything fits perfect, the wheel wears down, the
13 drum wears down differently. So what you have to do
14 is do what they call chamfer, sand the edges. You
15 have got to sand the edges.

16 As you sand the edges, fibers are released.
17 If fibers are released, you are going to breathe those
18 fibers.

19 If it goes in when you are making it, it
20 comes out when you are sanding it.

21 That is not the only way you get exposed.