

1 released from the use of brakes and those types of
2 materials in the 1940s and '50s and '60s, sir?

3 A No, but I can tell you this much, if you
4 look at an epidemiologic study -- I think right now
5 you are focusing on exposure, and it is true that most
6 of the fiber measurement studies were done in the
7 1980s. But if you look at the epidemiologic study, we
8 have garage mechanics who worked in the 1920s, 1930s
9 included in this study, especially in the German
10 study. They had to spell out the date of exposure.

11 So to a large extent, the issue of
12 historical exposure would not apply.

13 Q But the answer to my question, sir, is that
14 you don't know what the exposures were from the
15 materials that were actually in use in the 1940s and
16 '50s and '60s, do you?

17 A I don't need to know. My opinion is based
18 on those four studies, and as I said, those four
19 studies would include garage mechanics who worked in
20 the 1920s, 1930s and so on.

21 Q I understand you don't need to know that,