

1 You have been deposed on several occasions;
2 is that correct?

3 A Yes.

4 Q How many prior occasions do you think you
5 have been deposed on?

6 A I don't know exactly. I would presume
7 around 10 perhaps or 15 at the most.

8 Q So you are pretty familiar with the process;
9 is that correct?

10 A I would hope so.

11 MR. SMITH: Page 32.

12 BY MR. SMITH:

13 Q During the time that you were employed by
14 Ford, were you aware of files that involved
15 government contracts supplying -- Ford supplying
16 asbestos-containing brakes or friction products during
17 those years?

18 A In a few instances, on friction materials,
19 yes, I was aware of some special military vehicle
20 operations, SMVO.

21 Q Excuse me, special military --