

1 an amazingly strong data set for an occupational cohort
2 for which we can infer disease causation.

3 It is true there are some things that would be
4 ideal, for instance perhaps this cohort's more exposed
5 than Mr. Mallia was, Mallia, and therefore we're
6 talking about exposures that are much greater than what
7 he experienced because he isn't involved in beveling
8 and he's working much later in history than these
9 people.

10 So all I can tell you for purposes of this
11 case, these people were probably exposed I would expect
12 much more than he was in spite of the work practices
13 that he described.

14 Q But you have no factual basis for that
15 statement other than --

16 A Other than I studied all the published
17 information on the issue which is, seems to be a pretty
18 good basis for my view.

19 Q There is no published information regarding
20 work practices of mechanics contemporaneously published
21 in the 50s, is there?

22 A No.

23 Q And the 1960s other than the Hickish study?

24 A No. All you can do is base it on experience
25 through interviews.