

1 Q And what years are we talking about during
2 the time period from 1957 to the end of 1992, what
3 years would you have occasion to work with and around
4 brake lining materials?

5 A I worked on them just about daily through
6 those years. Sometimes a couple of times a day.

7 Q Was there any time period from 1957 to 1992
8 when more than a week would go by where you wouldn't
9 work with or around brake lining material?

10 A It would be pretty rare.

11 Q From 1957 up to the mid-1970s, what was the
12 composition of the brake lining materials that you
13 worked with and around at Foreign Motors?

14 A Asbestos.

15 Q In the course of your work, if at all, can
16 you describe how dust would be generated when working
17 with those brake lining materials?

18 A In the shop we used to -- in the early
19 years, we removed the brake drums to get rid of a lot
20 of the brake dust, and we would use a compressed air
21 hose and it would blow around the air quite a bit.