

1 been used historically to describe cases with no known
2 exposure to asbestos other than ambient?

3 A Yes, other than radiation, that's true.

4 Q Okay.

5 A Historically.

6 Q Right. And you cannot identify for me as we
7 sit here today a paper that has used that, a
8 peer-reviewed paper that has used that term
9 differently?

10 A None comes to mind.

11 Q All right.

12 A There may be some but none comes to mind.

13 Q I understand you're not a walking library.

14 A Not like you, Counsel.

15 Q Now with regard to the term "attributable
16 risk," can you describe that for me, and again I
17 apologize.

18 A As I recall it's generally used, if you had
19 three possible exposures to asbestos, one is a
20 bricklayer layer, one is an insulator and then let's
21 say a brake mechanic, where would you attribute the
22 risks, the overall risk would be. Which page are you
23 on?

24 Q I'm looking at the Spirtas paper from 1994.

25 A Okay, which page?