

1 Let me reintroduce myself to you. I am
2 Deborah K. Hines. I am a solo practitioner, and I
3 have the privilege and honor of representing Rosanna
4 Wood.

5 At this time, I would like to introduce Mrs.
6 Wood. This is Mrs. Wood, the widow of Nollie Wood.
7 (Whereupon, Mrs. Wood stood.)

8 MS. HINES: Thank you, Mrs. Wood.
9 Also in the courtroom is Nollie Wood, Jr.
10 Mr. Wood, would you please stand.

11 (Whereupon, Mr. Wood, Jr. stood.)

12 MS. HINES: Thank you.

13 This is the son, the only child of Mr. and
14 Mrs. Wood.

15 I will be assisted throughout this trial by
16 Shepard A. Hoffman.

17 Mr. Hoffman, would you stand at this time?
18 (Whereupon, Mr. Hoffman stood.)

19 MS. HINES: Thank you.

20 As I said, I am a solo practitioner. I have
21 my own law firm. And I want to say this up front,

1 there may be times throughout this trial I may not be
2 in the courtroom during the presentation of the
3 testimony that does not relate to Mr. Wood's case, and
4 I just ask you not to hold this against his case. I
5 will be attending to other matters and will have been
6 excused from the courtroom.

7 Let me introduce you to Nollie Wood. This
8 is a photograph of Mr. Wood, Mrs. Wood and the son,
9 Nollie Wood, Jr., in happier times.

10 Mr. Wood was born on August 5, 1918. He was
11 married to Rosanna Wood. They met in the early
12 1940s. Sometime afterwards Mr. Wood went into the
13 United States Army during World War II, and he served
14 in the military for a couple of years.

15 When he came out of the Army in 1946, at
16 that time he married Rosanna Wood and they were
17 married on June 30th of 1946.

18 This year would have marked the 50th wedding
19 anniversary for Mr. and Mrs. Wood.

20 Nollie Wood, Jr. was born to them in 1953.
21 Before that, Mr. Wood started working at the United

1 States Post Office and the garages of two of the
2 United States Post Offices here in Baltimore, and he
3 started working there in 1948.

4 That is where Mr. Wood was exposed to Ford
5 asbestos brake linings. And as a result of his work
6 at the post office -- and he worked there not as a
7 mechanic, but as a garage man, driver/mechanic.

8 He did not himself work directly on brakes,
9 but he worked in the garage around other gentlemen who
10 will come in this court and will testify that he
11 worked around brakes and he breathed that same
12 asbestos dust and he developed this mesothelioma as a
13 result of being around Ford brake linings.

14 His mesothelioma was diagnosed in January of
15 1990. As you can see, he died on May 26th of 1990.
16 This Sunday would have marked the six-year anniversary
17 of the death of Nollie Wood.

18 After Mr. Wood's death, Mrs. Wood had
19 developed some medical problems of her own, and as a
20 result of that, it renders her unable to drive and she
21 is unable to get around as she would like to, and

1 because of that and because of her health reasons,
2 there may be times throughout this trial that she
3 won't be here.

4 That is not because she doesn't want to be
5 here, and that is not because she is not interested in
6 her case. That is just because of the health
7 considerations that she has.

8 I want to talk to you a little bit about Mr.
9 Wood's medical treatment.

10 As I told you, Mr. Wood was diagnosed with
11 his disease in January of 1990.

12 However, before his diagnosis in November,
13 November 20th of 1989, which is really around
14 Thanksgiving of 1989, Mr. Wood began experiencing some
15 right shoulder pain.

16 He went to see his family doctor, Dr.
17 Conan, and told him he was having problems, shoulder
18 pain; and Dr. Conan treated him with Naprosyn, a
19 drug for pain.

20 One month later, around Christmastime, he
21 was still having shoulder pain but at this time he was