

1 You will also hear from an individual by the  
2 name of Arnold Anderson, and Mr. Anderson spent his  
3 entire work life working for Ford Motor Company.

4 These companies, Ford Motor Company in the  
5 case of Mr. Wood, as well as the other companies, knew  
6 or should have known that asbestos was harmful and  
7 they would have known that as far back as 1930 when  
8 the first report was available showing that asbestos  
9 was linked to disease, and it does not matter that it  
10 was not linked to mesothelioma.

11 They were on notice as far back as 1930 that  
12 asbestos could cause a disease, and we know that even  
13 prior to that in 1928, again, Ford Motor Company had a  
14 medical library at that time.

15 Ford Motor Company during the course of its  
16 selling brakes 1919 on up has probably sold tens of  
17 millions of brakes on vehicles and with that there is  
18 ample knowledge that they knew or should have known  
19 and accordingly, they should have put a warning on  
20 their products which they did not do until 1980.

21 These deaths would have been preventable

1 with something as simple as a warning.

2 We will also prove to you, another theory,  
3 we will prove to you the brake linings of the Ford  
4 Motor Company was unreasonably dangerous and  
5 defective.

6 Just breaking it down very simply to give  
7 you an analogy, it would be no different as if you go  
8 into a store, go into a hardware store and buy paint  
9 and you come out of the hardware store, you want to  
10 paint your house and you roll the paint on and that  
11 paint gives off fumes and years later as a result of  
12 the fumes that that paint gives off, you develop a  
13 disease, a cancer.

14 That would be no different than what is in  
15 this case with asbestos.

16 THE LAW CLERK: Five minutes, counsel.

17 MS. HINES: Thank you.

18 You would not expect that to happen. These  
19 gentlemen did that expect that to happen in their work  
20 lives working around asbestos either.

21 We are going to ask you to hold in the Wood

1 case Ford Motor Company responsible for Mr. Wood's  
2 death because Ford Motor Company, the evidence will  
3 show, is responsible for Mr. Wood developing this  
4 asbestos cancer and dying as a result of this asbestos  
5 cancer.

6 In fact, some of the evidence will show you  
7 that Ford Motor Company's internal records show that  
8 they took precautions with respect to the brakes for  
9 their own employees, but they did not care about the  
10 general population, the individuals like Mr. Wood and  
11 Mr. Grewe.

12 And we will prove that they should have  
13 cared, and when we return in closing argument, we are  
14 going to ask you that you return a verdict for the  
15 plaintiffs, for Mr. Wood, Mr. Grewe, and Mr.  
16 Vandergucht.

17 And we are going to ask you that you hold in  
18 the case of Mr. Wood, Ford Motor Company responsible  
19 for his death, and that in the cases of Mr. Wood, Mr.  
20 Vandergucht, and Mr. Grewe, to hold them, to hold  
21 these companies accountable for their deaths, their

1 pain, their suffering.

2 The case of Mr. Grewe, his lost wages, their  
3 medical bills, their funeral bills we believe that  
4 after you have heard all of the evidence, you will be  
5 able to return a verdict for each and every plaintiff  
6 in this case.

7 Thank you.

8 THE COURT: Thank you, Ms. Hines.

9 MR. MCGOWAN: Your Honor, may I have a  
10 moment just to change things around?

11 THE COURT: You may. We will only charge  
12 you double time.

13 (Whereupon, laughter ensued.)

14 MR. MCGOWAN: May I proceed, ladies and  
15 gentlemen?

16 THE COURT: Please.

17 OPENING STATEMENTS

18 MR. MCGOWAN: Thank you, Your Honor.

19 Good morning, ladies and gentlemen.

20 I think I introduced myself yesterday. My

21 name is Tim McGowan, and I represent Owens-Corning