

1 for service of a request or a deposition notice by the  
2 defense?

3 JUDGE KLINE: As far as I'm concerned.

4 MR. RUCKDESCHEL: Okay, I understand, thank  
5 you.

6 BY MR. RUCKDESCHEL:

7 Q Dr. Paustenbach, with respect to No. 22, have  
8 you brought with you responsive documents?

9 A I brought some as listed on my CV but I've not  
10 brought everything.

11 Q Okay. What materials have you not brought?

12 A Well, it's a very broad request. As I read it,  
13 you wanted fundamentally the PowerPoint presentations  
14 and any handouts from any speech I've ever given  
15 regarding asbestos and brakes, clutches or automobile  
16 parts. That's the way I read it.

17 Q That's correct, and may I ask a clarifying  
18 question here. Professionally you didn't start working  
19 in the asbestos litigation until the middle of 2001; is  
20 that correct?

21 A I think it's about right.

22 Q Okay.

23 A It may be a little before that. But it's been  
24 in the recent years.

25 Q And in that time since the middle of 2001, and