

1 mechanics or as auto mechanics I would say yes, the
2 data there I believe represents the vast majority of
3 people.

4 Q What you present in your 2003 paper is a
5 collection of data from various sources that you then
6 analyze and come to a conclusion regarding what the
7 average exposures were of brake mechanics over a period
8 of time?

9 A Right.

10 Q And when you say the vast majority, this
11 information is applicable to the vast majority of
12 individuals, what are you talking about in terms of
13 magnitude, that majority is, 60 percent, 80 percent,
14 95 percent?

15 A Well, based on what I've learned the last four
16 years, I would think it would apply to virtually
17 everyone. Now having said that, I have read testimony
18 of persons that were outside the norm. And I've been
19 asked hypotheticals about people that to the best of my
20 knowledge didn't exist and those behaviors didn't
21 exist.

22 So I'm hesitant to say that that paper covers
23 every imaginable person. And I know that Dr. Lemen has
24 put into question how broadly one can apply that
25 analysis as presented in the 2003 paper.