

1 Q In other words, what I am asking, is, did Ford, directly
2 from any of their plants, ship any brake linings or brak
3 pads to any of their dealerships throughout the country,
4 during the years 1961 to 1975, for after-market parts?

5 A We normally would not have done that. That was not our
6 practice. That was not the business procedures which
7 were in place for dealers to obtain parts. It is pretty
8 difficult to go back and research something to prove tha
9 something never happened.

10 Q Were any warnings ever given to any of the Ford dealer-
11 ships' service departments or the -- in any other fashion
12 with regard to the dangers of asbestos on the brake lining
13 and brake pads on new Ford vehicles from 1961 to 1965?

14 A Not to my knowledge.

15 Q Does Ford Motor Company have any record as to the volume
16 of brake linings or pads purchased from the various new
17 part suppliers during the years that I have mentioned?

18 MR. KRAUSE: I think he has already said he
19 doesn't know which percentages came from which.

20 MR. FLOYD: I didn't ask about percentages. I
21 just said the volume, the actual amounts purchased during
22 any specific years. Does Ford have those records?

23 Q (BY MR. FLOYD) I know you don't have them here in front
24 of you, but I wonder if any are available?

25 A I have not seen such records. I don't know if any exist.