

1 substantially the same form and wording as
2 that attached as Exhibit-5, entitled
3 Recommended Procedures For Reducing Asbestos
4 Dust During Brake Servicing." Did I read that
5 correctly?

6 A. That's correct.

7 Q. My question is what research are you
8 referring to, to come to the conclusion that
9 it was used in 1977 in every container?

10 A. Because I was there at that point in
11 time, and I recall us putting them in the
12 boxes.

13 Q. Is that the research you're referring
14 to, your own personal knowledge?

15 A. Yes.

16 Q. You didn't have to go to anybody else to
17 get the information?

18 A. No.

19 Q. You didn't review any documents?

20 A. ~~No. It may have been in Tami's~~
21 deposition as well.

22 Q. Who actually produced this little
23 document that went into the containers?

24 A. I believe the document -- I remember us
25 putting them in there. Initially we sent out