

1 other than what might be locked in your mind?

2 A No.

3 Q Okay. Did you speak with other employees of
4 Ford, General Motors or Chrysler during the drafting of
5 those papers about the topics of those papers, the 2003
6 paper and the 2004 paper?

7 A I think I've said before that I talked to Bill
8 Krebs before I finished that paper.

9 Q Did you talk with Mr. Toth during the
10 authorship of those papers?

11 A I don't think I saw him during the authorship.
12 I don't recall if it was before or after the paper was
13 accepted or not. I don't remember. Obviously whatever
14 I talked to Paul about didn't have much impact on the
15 paper.

16 Q The propositions in the paper for which you
17 cite your conversations with Mr. Anderson as the source
18 of the information, do you have other authority for
19 those propositions or are you relying upon Mr. Anderson
20 for them?

21 A That's a good question and it's not been asked
22 before except outside a deposition. I do. And in
23 retrospect I probably should have just cited those.

24 Q It's important from a reader's perspective in
25 critically evaluating a paper.