

1 THE COURT: Why can't you argue that under
2 this question?

3 MR. HOFFMAN: Well, under number 3, Judge,
4 you say, do you find by a preponderance of the
5 evidence, et cetera, et cetera, Mr. Wood's exposure to
6 asbestos-containing products manufactured, sold,
7 supplied, installed and distributed by Ford?

8 And we believe that the law allows us to
9 hold Ford liable even if it didn't manufacture -- if
10 Ford itself didn't manufacture, if Ford itself didn't
11 sell, if Ford itself didn't supply, if Ford itself
12 didn't supply, if Ford itself didn't distribute the
13 brakes, we believe that Ford itself is responsible,
14 that the truck as a unit is defective regardless of
15 whose brakes.

16 The way 3, 4 and 5 are phrased, I am
17 concerned that there is a hole, pretty big one,
18 through which I think Mr. Williams is going to try and
19 shove a defense verdict.

20 I know this from his Motion for Summary
21 Judgment. What he says is that Mr. Wood hasn't proven