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2 learned when you went on this fact-gathering

3 mission to learn about asbestos as a health hazard

4 in the United Kingdom?

5 A. Yes.

6 Q. You attempted to put together a report

7 which summarized that information that you learned

8 from the respective authorities that you talked to;

9 correct?

10 A. Yes, that as well.

11 Q. As far as you were concerned, at least

12 to the best of your ability, this was the

13 state-of-the-art information from those authorities

14 in England at the time in May of 1967?

15 A. It was.

16 Q. Did you know a man at Union Carbide or

17 who was at Union Carbide named Robert Woolery?

18 A. Yes.

19 Q. And you understood him to be a person at

20 Union Carbide who had particular expertise in the

21 use of Union Carbide asbestos in papermaking?

22 A. Yes. We ran trials together in the

23 U.K.

24 Q. Where did he actually work at Union

25 Carbide?

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2 A. I thought it was the Niagara Falls

3 office near Buffalo.

4 Q. It sounds like he then came over to

5 England to help you or some of these papermaking

6 companies in England run trials using the Union

7 Carbide asbestos?

8 A. He did.

9 Q. Do you know whether Mr. Woolery got a

10 copy of your paper entitled "Asbestos as a Health

11 Hazard in the United Kingdom"?

12 A. I believe he did, yes.

13 Q. Did you give it to him?

14 A. Peter Cheston would have sent it to him.

15 Q. Do you know, was he a doctor?

16 A. I don't think --

17 MR. WILL: Can you specify medical or

18 Ph.D.?

19 Q. Let me ask you this: What sort of

20 degree did Mr. Woolery have?

21 A. I have no idea. He was a senior member.

22 You don't ask senior members those sort of

23 questions.

24 Q. So he was senior to you?

25 A. Oh, very much so, yes.

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2 Q. And you recognized him as a person at

3 Union Carbide with particular expertise in the use

4 of asbestos in the papermaking process?

5 A. Yes.

6 Q. You recognized that he was a person at

7 Union Carbide who was providing technical

8 information for the use of asbestos in the

9 papermaking process?

10 A. Yes.

11 (Sayers Exhibit 17, report titled

12 "Effects of Chrysotile Asbestos Additions to

13 Cellulosic Paper" by Woolery, Bates stamped

14 076676 through 700, marked for

15 identification, as of this date.)

16 Q. Let me show you a copy of a report that

17 he has written which is titled "Effects of

18 Chrysotile Asbestos Additions to Cellulosic Paper"

19 by Robert G. Woolery. We marked it as Exhibit

20 Number 17. He's identified as group leader,

21 product development and technical services, Union

22 Carbide Corporation, New York.

23 A. Yes.

24 Q. Have you ever seen that before?

25 A. One minute. Do we have a date? Do you

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2 know if there's a date on it?

3 Q. No, I don't. I'm just showing it to you

4 and asking if you've seen it or not.

5 MR. WILL: Do you have another copy of

6 that, Mr. Brownson, so I can follow along?

7 MR. BROWNSON: Not a clean copy, no.

8 A. I'm pretty sure I saw a copy of this,

9 yes.

10 Q. You recognize that as a technical paper

11 authored by Mr. Woolery about the use of Union

12 Carbide Calidria asbestos in the papermaking

13 process?

14 A. Yes. This was early on. I used this as

15 a Bible.

16 Q. Sp would you, then, have used this in

17 your work when you were going out to these

18 papermaking companies -- customers in England?

19 A. The knowledge contained therein. I

20 didn't produce it in front of customers.

21 Q. I understand you didn't write this, but

22 would you have this with you when you called on

23 customers?

24 A. Probably not. Once I digested the

25 information, it was in my head.