

1 Sayers  
 2 draw your attention to page 4 there under the  
 3 introduction. The first thing you say is that  
 4 "Union Carbide U.K. Limited has been promoting the  
 5 sale of Coalinga asbestos for just over two years";  
 6 right? That's your opening sentence?  
 7 A. Yes.  
 8 Q. I want to make sure we're clear here.  
 9 Coalinga asbestos is the same thing as Calidria  
 10 asbestos?  
 11 A. Yes.  
 12 Q. Those are two different names for the  
 13 same thing; right?  
 14 A. They're synonymous, yes.  
 15 Q. You recognize that as the Union Carbide  
 16 chrysotile asbestos mined at King City, California?  
 17 A. Correct.  
 18 Q. At the Union Carbide mine?  
 19 A. That's right.  
 20 Q. Then you say, "During this time, the  
 21 public has become increasingly aware of the  
 22 considerable health risks associated with the use  
 23 of this material."  
 24 Do you see that?  
 25 A. I do.

1 Sayers  
 2 Q. Now, when you wrote that, you didn't say  
 3 that the public was becoming increasingly aware of  
 4 considerable health risks associated with other  
 5 kinds of asbestos; you said "this material"; right?  
 6 What you meant there was asbestos?  
 7 A. I meant asbestos, not specifically  
 8 Coalinga.  
 9 Q. But you also didn't mean specifically  
 10 other kinds of asbestos. What you meant was all  
 11 asbestos?  
 12 A. I did.  
 13 Q. Then when you continue and you say, "So  
 14 far, over 20 potential customers have raised the  
 15 issue," you're talking about 20 potential customers  
 16 of Union Carbide Calidria chrysotile asbestos?  
 17 A. That's right.  
 18 Q. To whom you were trying to sell this  
 19 asbestos in your job as a salesperson?  
 20 A. Yes.  
 21 Q. And these customers were these  
 22 papermaking mills that you told us about earlier?  
 23 A. That is right.  
 24 Q. So just if I could summarize this, the  
 25 papermaking mills in England were coming to you and

1 Sayers  
 2 saying, look it, you know, you're trying to sell us  
 3 the Union Carbide asbestos but we have questions  
 4 about the use of asbestos in our mills?  
 5 A. Yes.  
 6 Q. Then you continue and you say, these 20  
 7 or so customers or over 20 customers have requested  
 8 an assurance that Union Carbide's material will not  
 9 be a source of danger to their employees; correct?  
 10 A. Yes.  
 11 Q. And at least as far as you were  
 12 concerned, once you completed your review and  
 13 completed your report, you concluded that you could  
 14 not give any kind of absolute assurance that there  
 15 was no health hazard with that asbestos or any  
 16 other kind of asbestos?  
 17 A. Definitely could not.  
 18 Q. There were some health hazards, maybe  
 19 different kinds, associated with the use of  
 20 asbestos?  
 21 A. So it appeared, yes.  
 22 Q. One of those hazards that you  
 23 specifically identified and talked about in your  
 24 report and found reference to in the scientific  
 25 literature was mesothelioma?

1 Sayers  
 2 A. Yes.  
 3 Q. Then you continue and you say that Union  
 4 Carbide's replies up to this time, May 12th, 1967,  
 5 to these customers has been based on two  
 6 communications sent from the New York office. And  
 7 by that I assume you mean the New York office of  
 8 Union Carbide.  
 9 A. That is so, yes.  
 10 Q. Sent over to England; right?  
 11 A. Yes.  
 12 Q. The first is March 22nd, 1966. Do you  
 13 know what that was?  
 14 A. Yes.  
 15 Q. What?  
 16 A. I think this was this table this  
 17 morning.  
 18 MR. WILL: It's an exhibit. I think he  
 19 means it's -- it's Exhibit 5, I believe.  
 20 MR. BROWNSON: Can you point that out  
 21 for us?  
 22 MR. WILL: Sure. Yes, it's Exhibit 5.  
 23 THE WITNESS: That's it.  
 24 Q. So the first thing Union Carbide  
 25 showed the customers was what's been marked as