

1 Sayers
 2 Q. Is that a factor you would have liked or
 3 been interested in knowing?
 4 A. Very much so.
 5 Q. And Mr. Polk asked you a question if
 6 you -- whether you would like to know how many
 7 people had died from the Conwed plant. Do you
 8 recall that question?
 9 A. I do.
 10 Q. Do you feel that without the information
 11 about amosite that question was misleading?
 12 MR. BROWNSON: Objection, leading.
 13 A. I must say yes.
 14 Q. Do you feel it was maybe a half-truth?
 15 MR. BROWNSON: Objection, leading.
 16 A. It could have been.
 17 Q. Tell me, Mr. Sayers, you were asked
 18 about whether you would be interested in how many
 19 people had gotten sick from exposure to Calidria
 20 asbestos; do you remember that?
 21 A. I do.
 22 Q. Did Mr. Polk tell you anything about the
 23 experience at King City, California, where the
 24 workers mined and milled Calidria asbestos?
 25 MR. POLK: Objection, leading.

1 Sayers
 2 A. No.
 3 Q. Did Mr. Polk tell you anything about the
 4 fact that there hadn't been any cases of
 5 mesothelioma out there?
 6 MR. POLK: Objection, leading.
 7 MR. BROWNSON: Objection, leading.
 8 A. That was my understanding. I was
 9 surprised by the revelation.
 10 Q. Did Mr. Polk tell you that, though?
 11 A. No.
 12 Q. Did Mr. Polk tell you that there hadn't
 13 been any cases of lung cancer among the people out
 14 there?
 15 MR. POLK: Same objection, leading,
 16 self-serving.
 17 A. No, he did not.
 18 Q. Did Mr. Polk tell you that there hadn't
 19 been any cases of asbestosis of the workers out
 20 there, among the workers out there?
 21 A. No, he did not.
 22 MR. POLK: Same objection.
 23 MR. BROWNSON: Same objection.
 24 Q. Would you be interested in knowing
 25 about the health experience of the workers who

1 Sayers
 2 worked only with Calidria asbestos?
 3 A. Yes, I certainly would.
 4 Q. Would you think that was relevant
 5 information?
 6 A. Indeed.
 7 Q. And by not giving you that information,
 8 do you think you were given a half-truth?
 9 MR. BROWNSON: Objection, leading,
 10 argumentative.
 11 A. I do.
 12 Q. You were asked a number of questions
 13 about whether in your opinion asbestos could be
 14 hazardous or cause injury. Do you recall that line
 15 of questioning?
 16 A. Yes, I do.
 17 Q. I want to make sure I understand,
 18 because I thought I heard you say a couple of
 19 different things to Mr. Polk.
 20 Do you have the Dernehl toxicology
 21 report, which is Exhibit 4?
 22 A. 3.
 23 Q. 3, I apologize.
 24 A. Yes.
 25 Q. It starts out very first sentence says,

1 Sayers
 2 "It has been known for many years that some persons
 3 working in asbestos production were prone to
 4 develop a disabling lung disease. In time, this
 5 condition became known as asbestosis and was
 6 related to exposure to high concentrations of
 7 asbestos dust."
 8 Did I read that correctly?
 9 A. Yes, you did.
 10 Q. When you were working for Union Carbide
 11 in 1965, '66, '67, what was your belief about
 12 whether high -- exposure to high concentrations of
 13 asbestos dust could in fact cause asbestosis?
 14 A. Yes, I understood that to be the case.
 15 Q. When you looked at Exhibit 2, the New
 16 York -- excuse me, the Sunday Times article about
 17 mesothelioma, did you also understand that in some
 18 circumstances asbestos could cause mesothelioma?
 19 A. I understood the article, but it was
 20 clear that that particular disease was in its very
 21 early days, and I don't think it was fully
 22 categorized.
 23 Q. When you did your reading of your
 24 articles and your talking with the medical
 25 professionals, as I read your report, you were told