

1 MR. SHELLENBERGER: Thank you, Your Honor.

2 This is Tuesday, October 24th, 1995, page
3 3170, line 16.

4 Your Honor, at this time the plaintiffs have
5 a very brief reading of trial testimony conducted in
6 the Abate I, the first Consolidation in 1992; and this
7 is the testimony of Dr. Thomas F. Mancuso, and the
8 date is March 17th of 1992.

9 Reading of trial testimony of Dr. Mancuso
10 taken on March 17th, 1992.

11 READING OF TRIAL TESTIMONY OF DR. THOMAS F. MANCUSO

12 TAKEN ON MARCH 17, 1992

13 (Whereupon, the questions were read by Mr.
14 Shellenberger and Mr. McGowan and the answers were
15 read by Mr. Ignatowski.)

16 BY MR. SHELLENBERGER:

17 Q Doctor, would you state your name and your
18 business address, please.

19 A Dr. Thomas F. Mancuso, capital
20 M-a-n-c-u-s-o, 5127 Elsworth Avenue, Pittsburgh,
21 Pennsylvania.

1 Q Where did you go to medical school, sir?

2 A Creighton University, Omaha, Nebraska.

3 Q What year did you graduate?

4 A 1937.

5 THE COURT: Before you continue, let me just
6 ask, are there any defense designations?

7 MR. MCGOWAN: Your Honor, I believe there is
8 a page or two that I will read.

9 THE COURT: Okay. I just wanted to make
10 sure I got that correct.

11 Thank you, Mr. McGowan.

12 MR. MCGOWAN: If no one has any objection,
13 we will expedite and summarize the things.

14 MR. IGNATOWSKI: I don't have it.

15 MS. TOSTANOSKI: It is in there.

16 MR. MCGOWAN: It takes a minute.

17 BY MR. SHELLENBERGER:

18 Q Did you ultimately enter a field of
19 specialty in the practice of medicine?

20 A I did, sir.

21 Q What is that?

1 A Industrial medicine, in 1942.

2 Q Do you hold a Master's degree in public
3 health?

4 A Yes, sir.

5 Q Did you work for the Surgeon General of the
6 United States?

7 A Yes, sir.

8 Q As distinguished from clinical medicine or
9 hands-on doctoring, what kinds of medicine did you
10 practice?

11 A Public health is the specialty of industrial
12 medicine and industrial hygiene which, in contrast to
13 clinical medicine, which is focused on individuals,
14 the public health, and industrial medical aspects
15 focused on hundreds and thousands and eventually
16 millions of individuals, and in groups of all of those
17 individuals who are exposed to the microchemical
18 environment, the toxic dusts, fumes, vapors, mists and
19 gases in which they are exposed during the work
20 environment, in contrast to the microbiological
21 environment or causation of the disease that the

1 doctor in practice uses, the causation by bacteria,
2 virus.

3 That would quickly summarize it.

4 Q All right. If I could try and put it in my
5 own terms so I can understand what you said, the
6 average doctor out there will take one patient and
7 examine him and he will diagnose, hopefully, what that
8 patient has, right?

9 A Yes, sir.

10 Q What you are doing is look at groups of
11 patients and trying to find out what causes disease in
12 an individual patient; is that fair?

13 A Yes, sir, the industrial population.

14 Q Sir, have you been the recipient of any
15 awards and recognitions of your practice in public
16 health?

17 A Yes, sir.

18 Q Did you receive an award in the late 1980s
19 from the Steelworkers of America?

20 A Yes, 1987, sir.

21 Q Were you recognized by international

1 . scientists all over the world in the organization
2 called the Collegium Ramazzini?

3 A Yes, sir, in 1988 there were two
4 international scientists selected, Dr. Clemmesson from
5 Denmark and Dr. Mancuso, myself, from the United
6 States.

7 Q Doctor, the jury has heard the name American
8 Conference of Governmental Industrial hygienists.

9 Have you held an office in that
10 organization?

11 A Yes, sir.

12 Q What office did you hold?

13 A The highest office was chairman in 1958,
14 sir.

15 Q Did you hold that office?

16 A Yes, sir.

17 Q Have you published any articles in the
18 scientific literature, Doctor, that dealt with
19 asbestos disease?

20 A Yes, sir.

21 Q Can you tell us approximately how many?

1 A I think there were eight major articles,
2 sir.

3 Q Eight major articles on asbestos?

4 A Yes, sir.

5 Q Have you been called upon to present your
6 findings at international meetings of scientists, that
7 is, your findings on asbestos?

8 A Yes, sir.

9 Q Have you been called upon to testify before
10 governmental agencies, including the Congress of the
11 United States?

12 A Yes, sir.

13 Q Did you serve as an advisor to the
14 Occupational Safety and Health Administration when
15 that agency came into existence?

16 A Yes, sir, as part of a congressional review
17 that I carried out.

18 Q Doctor, did you serve as vice-president of
19 the American College of Preventive Medicine?

20 A Yes, sir.

21 Q You have been a consultant with the Surgeon

1 General of the United States on air pollution?

2 A Yes, sir.

3 Q Now, I have asked you to prepare some way to
4 show the jury -- when you say five million particles
5 per cubic foot, five million sounds like a lot to me.

6 But have you prepared something to show the
7 jury what five million looks like in connection with
8 asbestos?

9 A Yes, I have. I have to do it by weight
10 because it is microscopic in nature and you can't see
11 it, but only if you do it by weight can you see a tiny
12 speck, and I have prepared that sample.

13 Q Is that sealed so it won't get out?

14 A Yes, it is sealed. The tiny white point is
15 100 percent pure asbestos.

16 Q Is it five million particles, the white
17 spec?

18 A The white spec.

19 MR. SHELLENBERGER: That would conclude our
20 portion, Your Honor.

21 THE COURT: Mr. McGowan.

1 MR. MCGOWAN: 3179.

2 MR. IGNATOWSKI: I don't have your counter
3 designations.

4 MR. MCGOWAN: All right. 3179, do you have
5 that page of the deposition?

6 MR. SHELLENBERGER: What?

7 MR. MCGOWAN: 3179, do you have it?

8 It is just one page.

9 One second, Your Honor.

10 (Whereupon, pause.)

11 MR. IGNATOWSKI: Line 8, yes.

12 BY MR. MCGOWAN:

13 Q You have a little vial of asbestos that you
14 showed us yesterday that you said was asbestos.

15 A Yes, 100 percent asbestos. I don't have it
16 here. I have turned it over for the Court to have.

17 Q Who measured that asbestos?

18 A Professor John Fohlinger at the University
19 of Pittsburgh, who has his own private consulting
20 company.

21 Q You did not measure it, did you?

1 A No. It was done by a specialist, a
2 professor in industrial hygiene chemistry.

3 Q Did you count the fiber?

4 A No, the professor of industrial hygiene did
5 it by weight. He took care of that, sir.

6 Q They just handed you a vial and told you
7 what was in it?

8 A With an attached affidavit saying what it
9 was.

10 Q You did not personally prepare that, did
11 you?

12 A No, I am a professor of industrial
13 medicine. I rely upon professors of industrial
14 chemistry to do that.

15 MR. MCGOWAN: That is all. Thank you, Your
16 Honor.

17 THE COURT: Thank you. Next.

18 MS. HINES: Your Honor, at this time I would
19 like the Court to take judicial notice that Mr. Wood's
20 case was filed in September of 1992.

21 And next, we will have the reading of the