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philosophy about whether or not to share information regarding potential health hazards with customers?

A. We were encouraged to talk to customers about it; we had to, because they were going to raise it in any case. And we were equipped with the Dr. Dernehl toxicology report as a basis for discussion.

Q. Before we get to the toxicology report, I want to ask you one other thing. Were there -- you said that Union Carbide encouraged you to share information with customers. Was there any material that the alloys division was selling other than asbestos that involved potential hazards?

MR. LANIER: Objection, form.

A. Yes, when I was a sales correspondent in the early days, I was aware of one product called Cupola Carbide. There was a data sheet which dealt with the handling practices.

Q. And that data sheet, what was done with that?

A. That was sent out to customers utilizing the product.

(Sayers Exhibit 3, Dernehl asbestos

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toxicology report, Bates stamped UCASB00114864 through 65, marked for identification, as of this date.)

Q. You mentioned Dr. Dernehl's toxicology report. Let me show you what we've marked as Exhibit 3. Can you identify that?

A. Yes. That is the document.

MR. BROWNSON: What is the date of that document?

MR. WILL: That's the document that doesn't have a date on it, but it's the 1964 toxicology report.

MR. LANIER: '64 or '66?

MR. WILL: '64.

Let's go off the record.

MR. BROWNSON: I'm going to object to its use unless we know the date of it.

THE VIDEOGRAPHER: 9:59 a.m. We're going off the record.

(Recess taken from 9:59 to 10:08.)

THE VIDEOGRAPHER: The time is 10:08 a.m. We're back on the record.

Q. Mr. Sayers, would you look at Exhibit 3, and can you identify that, tell us what that is?

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A. Yes, I can.

Q. What is it?

A. That is the toxicology report produced by Dr. Dernehl.

Q. And did you have that in the London office before you wrote your report in 1967?

A. Oh, yes.

Q. Do you remember precisely when it was that you received that document?

A. No, I can't be precise on that.

(Sayers Exhibit 5, memorandum dated 3/22/66, Bates stamped UCASB00114861 through 65, marked for identification, as of this date.)

Q. Let me show you what we have marked as Exhibit 5. Is Exhibit 5 a five-page document that starts with a memorandum dated March 22nd, 1966?

A. Yes, that's right.

Q. And is Exhibit 5 the letter of March 22nd, 1966, that is referenced at page 4 of your report?

A. It is.

Q. And was Exhibit 5 a document that was in the files of Union Carbide in London?

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A. It was.

Q. Now, you mentioned earlier that you would distribute the asbestos toxicology report to customers?

A. Yes. I carried copies with me.

Q. How did you make those copies?

A. On one of the first rank Xerox photocopiers in England.

Q. You actually just handed them out?

A. Yes, when necessary.

Q. These, then, pieces of information from Union Carbide were also used in preparing your report?

A. That's correct.

Q. Where did you actually write the report?

A. I remember it well. I was in a hotel bedroom in Perth in Scotland one rainy Sunday afternoon.

(Sayers Exhibit 4, photocopied picture of Sayers, marked for identification, as of this date.)

Q. Let me show you what we've marked as Exhibit 4. Can you identify that, please?

A. Yes. I'll own that that's me.