

Economic: Sister will send \$2,000 check

Peter will fund copy machine

Peter will handle travel using Gerson's credit card

314-938-4428 Marilyn Leisner (stay with her)

Gerson will try to get in on Friday of Thanksgiving:

Truth of precise statements made by Peter.

Experts won't go to fraud issue, except Devra will say fraudulent

Sam needs work -- needs to understand mistakes. Others are epi's and can stay what standard of care is for epi studies.

Difference in study dates

Reasonable to do study in isolation

Bring out that Monsanto is involved in four major lawsuits

At some point, they learn that non-explosion workers have chloracne, therefore they knew they had problem with classification. From that point on, they had to stop study or explain. Fraud in presentation, not in conduct.

No in depo, but at trial: doing studies at same time, had to know at some time that there were problems with studies, fraud by subsequent ratification.

Make them think they're defending fraud by commission, but we'll try fraud by subsequent publication/ omission

Take Carol to St. Louis. Peter will contact Rex Carr to be witness. Carol should go through Carr's stuff and Gerson's St. Louis stuff.

Peter's deposition in St. Louis, don't allow, unless they pay expenses.

Don't take Cate.

They will have to do subpoena for Davis.

310-473-2669 tomorrow morning.