

334 1 Sayers 2 computed. It's almost 5:30 now. 3 MR. WILL: I have some other things I 4 would like to cover with the witness. 5 MR. POLK: That's fine. You can do it 6 in the morning. I don't have any problem 7 with that. 8 MR. WILL: I don't think we have any 9 arrangements to do that. We can take a 10 15-minute break if you want to grab a 11 sandwich or something like that. 12 MR. POLK: There is not a judge in the 13 country, Trevor, that would say my request 14 to resume in the morning is out of line. 15 MR. WILL: Nobody has made 16 arrangements to do it tomorrow. 17 MR. POLK: This deposition is noted to 18 continue from day to day until completed. 19 MR. BROWNSON: Right. 20 MR. WILL: I want to at least finish a 21 couple things, and then we can take a break. 22 These will be very short. 23 MR. POLK: The record will reflect I 24 am leaving the room. It is now 5:30. I 25 have health issues I have to deal with. I	336 1 Sayers 2 MR. WILL: Yes, let's talk to him. He 3 left the room. He doesn't leave any 4 instructions. 5 MR. GOLDMAN: Actually he did leave 6 instructions to call his hotel. 7 MR. WILL: Right. Where is he 8 staying? I have no idea where he's staying. 9 MR. SHIPLEY: Do you know where he's 10 staying? 11 MR. BROWNSON: Do whatever you want -- 12 MR. SHIPLEY: What is unreasonable 13 about stopping -- he has ten minutes of 14 examination that has been going all day. 15 What is wrong with that? 16 MR. BROWNSON: I say Trevor resumes at 17 his peril. I will sit here until he's done. 18 He can do whatever he wants. 19 MR. WILL: Let's go back on the video 20 record. 21 THE VIDEOGRAPHER: The time is 5:32 22 p.m. We're back on the record. 23 MR. BICKS: I'm going to suggest to 24 Lulanne, can you go out and find Mr. Polk 25 and offer to bring him up something from our
335 1 Sayers 2 haven't eaten all day. I'm going to leave 3 the room. 4 If we're going to resume in the 5 morning, that's fine. You can call my hotel 6 and let me know what time we're resuming. 7 Otherwise reserve my right to restrain all 8 uses of this deposition in any proceedings 9 relating to any of my cases in any 10 jurisdiction in the country, most 11 particularly Minnesota. 12 MR. WILL: I ask you wait for five 13 minutes. I have two subjects to cover. 14 Then we can discuss this off the video 15 record. 16 MR. POLK: No, sir. I don't feel 17 well. Don't you get it? 18 MR. BROWNSON: Trevor, he doesn't feel 19 well. He's asking for a break, and you're 20 ignoring him. Your notice says it will be 21 completed from day to day. 22 (Mr. Polk leaves proceedings.) 23 MR. BROWNSON: I think you are being 24 unreasonable. You have a guy who has some 25 sort of illness. Can we take a moment here?	337 1 Sayers 2 cafeteria if he would like something to eat? 3 I'm happy to actually have my secretary 4 bring him up something. Let's see what he 5 would like. Thank you. 6 Q. Mr. Sayers, in that Exhibit 13 -- 7 A. Yes. 8 Q. -- Mr. Brownson directed your attention 9 to the reference to an experiment with respect to 10 3,4-benzopyrene in asbestos. Do you see that? 11 A. Yes, I do. 12 Q. To your understanding as there any 13 3,4-benzopyrene in Calidria? 14 A. To my knowledge, there was no material 15 of that sort present. 16 Q. In Calidria? 17 A. In Calidria asbestos. 18 MR. BROWNSON: Objection, leading. 19 Q. Did you have an understanding of what 20 type of asbestos had 3,4-benzopyrene in it? 21 A. I believe it was crocidolite. I do 22 remember the reference to that. 23 Q. You were asked a question about whether 24 your current company, Scapa, had any connection 25 with Union Carbide or any of its subsidiaries. Do