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2 from this to be examined by Dr. Dernehl and perhaps

3 issued for salespeople.

4 Q. And who did you expect to select the key

5 points?

6 A. Oh, the experts in New York.

7 (Sayers Exhibit 24, memorandum dated

8 4/3/69 from Lane, Bates stamped A03137

9 through 41, marked for identification, as of

10 this date.)

11 Q. Let me show you what we've marked as

12 Exhibit 24. For the record, it's a memorandum

13 dated April 3rd, 1969, from K.S. Lane to a number

14 of people; correct?

15 A. Yes, that is correct.

16 Q. Do you recall ever seeing this document

17 before?

18 A. No, because I left the company before

19 that date.

20 Q. You left the asbestos aspect of it?

21 A. Yes.

22 MR. BROWNSON: I think he said he had

23 left the company.

24 Q. Had you left Union Carbide Belgium on

25 that date?

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2 A. No, I had not. I had left -- the

3 asbestos product had been handed over to the U.S.

4 at that time.

5 Q. Do you see the sentence in the second

6 paragraph that says, "We briefly discuss" -- let me

7 back up a second. This document is referring to a

8 revision to the 1964 asbestos toxicology report.

9 A. Yes.

10 MR. BROWNSON: Objection, leading.

11 Q. Do you see in the second paragraph it

12 says, "We briefly discuss mesotheliomas, but data

13 is too scanty as yet for a definite policy to be

14 established"?

15 A. Yes.

16 Q. Do you see that statement appearing

17 there in the Exhibit 6, the 1969 toxicology report:

18 "The data is too scanty for a definite policy to be

19 established"?

20 MR. BROWNSON: Objection. The document

21 speaks for itself.

22 A. No, I don't.

23 (Sayers Exhibit 25, document dated

24 1/19/68 from McDaniel to Riddle, Bates

25 stamped A07074, marked for identification,

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2 as of this date.)

3 Q. I want to show you what we've marked as

4 Exhibit 25. Is that a document dated January 19th,

5 1968, from Paul McDaniel to John Riddle?

6 A. Yes.

7 Q. Do you recall seeing this document

8 before?

9 A. No, I don't.

10 Q. I want to direct your attention to the

11 second paragraph. Do you see the statement there

12 that says, "The limit of 5 million particles per

13 cubic foot" --

14 A. Yes.

15 Q. -- "that we observe in our operations is

16 still recognized in the United States as

17 satisfactory for chrysotile, but there is strong

18 feeling that it is much too high for crocidolite"?

19 A. Yes.

20 MR. BROWNSON: Objection. It's leading

21 and also the document speaks for itself and

22 it's without foundation.

23 Q. Looking at Exhibit 6, Mr. Sayers, do

24 you see any statement in Exhibit 6 that says 5

25 million particles per cubic foot is still

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2 satisfactory for chrysotile?

3 MR. BROWNSON: Objection. The document

4 speaks for itself. It's also leading.

5 A. No, I do not.

6 Q. Do you see at the top of Exhibit 25 in

7 the first paragraph where it says, "The relation

8 between chrysotile and mesothelioma is not clear.

9 If it exists, it apparently is much less pronounced

10 than that from crocidolite." Do those words

11 appear?

12 MR. BROWNSON: Objection, it's leading.

13 the document speaks for itself, it's without

14 foundation.

15 A. Yes, I read that.

16 Q. Do you see any statement in Exhibit 6,

17 the 1969 toxicology report, that says the

18 relationship between chrysotile and mesothelioma is

19 not clear?

20 MR. BROWNSON: Same objections as I said

21 before.

22 A. No, I do not.

23 Q. Take a look, if you would, please, in

24 your report at page 15. paragraph 6.1.2.

25 A. Yes.