

1 Sayers  
 2 Exhibit Number 5?  
 3 A. I wouldn't say it was the first thing.  
 4 I carried these documents around with the Dernehl  
 5 report, which I used predominantly.  
 6 Q. Well, it's the first thing mentioned in  
 7 your report, but it's one of three things that you  
 8 say --  
 9 A. There was no specific order.  
 10 Q. Can I see that?  
 11 A. Certainly (handing).  
 12 Q. If I can summarize this, up until the  
 13 time of your report on May 12th, 1967, you were  
 14 attempting to reassure your papermaking customers  
 15 in England about asbestos health hazards by showing  
 16 them information from three things: Dr. Dernehl's  
 17 toxicology report; this letter, which is entitled  
 18 "Asbestos Toxicology" --  
 19 A. Yes.  
 20 Q. -- and also a letter of October 7th,  
 21 1966.  
 22 A. Which is also a table this morning; no?  
 23 Q. That's what you talked about?  
 24 A. It was in similar vein to that.  
 25 Q. And you felt that further information

1 Sayers  
 2 was needed to convey to these customers that these  
 3 three things weren't giving them the kind of  
 4 assurance that they were looking for from you?  
 5 A. Yes, it was as desirable.  
 6 Q. Just so I'm clear here, the further --  
 7 was any further information ever given to customers  
 8 while you were calling on these papermaking mills?  
 9 A. No. We relied first and foremost on the  
 10 Dernehl toxicology report.  
 11 Q. So what you were handing, then, to  
 12 customers in the papermaking business in England  
 13 was the asbestos toxicology report by Dr. Dernehl?  
 14 A. That is so.  
 15 Q. Even though, as you say in the  
 16 introduction to your report, that didn't seem to be  
 17 giving them all the assurances they wanted;  
 18 correct?  
 19 A. Right.  
 20 Q. And you were hoping to be able to give  
 21 them further and more information?  
 22 A. Yes.  
 23 Q. Again, as far as you know, they never  
 24 got further written assurances or information?  
 25 That's basically what they got?

1 Sayers  
 2 A. During that time period, no.  
 3 Q. Right. When you say "no," I guess I'm  
 4 not sure my question was clear. That's basically  
 5 what they got?  
 6 A. They got nothing more.  
 7 Q. Yes.  
 8 Now, you were shown today a report by  
 9 the Union Carbide -- a study Union Carbide  
 10 commissioned from the Mellon Institute in  
 11 Pittsburgh, and we talked about that. That was of  
 12 July 8, 1966; correct?  
 13 A. Yes.  
 14 MR. WILL: Excuse me, Mr. Brownson. Can  
 15 we go off the record? There's a disturbance  
 16 at the end of the conference room.  
 17 THE VIDEOGRAPHER: 2:44 p.m. We're  
 18 going off the record.  
 19 (Pause.)  
 20 THE VIDEOGRAPHER: The time is 2:46  
 21 p.m. We're back on the record.  
 22 Q. I was asking you about the report of  
 23 the Mellon Institute of July 8th, 1966. As I  
 24 understand it, until you were shown it today, you  
 25 had not seen it?

1 Sayers  
 2 A. That is so.  
 3 Q. So clearly this was not something you  
 4 were giving to your customers in the papermaking  
 5 business over in England back in the 1960s?  
 6 A. Definitely not, no.  
 7 (Sayers Exhibit 13, letter dated 2/4/66  
 8 to Cheston, Bates stamped U005926, marked  
 9 for identification, as of this date.)  
 10 Q. Let me show you what we've marked as  
 11 Exhibit Number 13, which for the record is a letter  
 12 addressed to Mr. Peter Cheston of Union Carbide  
 13 Limited, 8 Grafton Street, London, England, of  
 14 February 4th, what looks like 1966.  
 15 Does that look right? Can you tell?  
 16 A. It looks like it, yes.  
 17 Q. Have you ever seen this before?  
 18 A. I'm pretty sure I would have done, yes,  
 19 working so close to Peter.  
 20 Q. And when you say "so close to Peter,"  
 21 you said his office was five feet away?  
 22 A. Five yards.  
 23 Q. It was a small operation you had in that  
 24 office; right?  
 25 A. Yes.