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1 Sayers

2 Carbide will be able to sell more product; right?

3 A. Yes.

4 Q. And that was your goal, to find out

5 whether or not that assurance could be given; true?

6 A. True.

7 Q. You walked away from your study and the

8 reaction thinking that the assurance is basically

9 there, didn't you?

10 A. Not from the study, no.

11 Q. No, not from the study. You're right.

12 Your study doesn't give that assurance; your study

13 raises questions, doesn't it?

14 A. Yes, it does.

15 Q. It questions whether or not the TLV is

16 proper, doesn't it?

17 A. It refers to that, yes.

18 Q. It raises questions on whether or not

19 mesothelioma is going to be protected by even a low

20 TLV, doesn't it?

21 A. It was a quotation from a learned

22 source, yes.

23 Q. It raises questions about what the moral

24 and ethical obligations are and how you should

25 follow those; right?

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2 A. Yes, that was intended to provoke a

3 little so that we got a response.

4 Q. After Union Carbide responded to you,

5 did you feel safe in going out and selling your

6 asbestos?

7 A. Yes, I did.

8 Q. Did Union Carbide's response to these

9 questions make you think that it was a safe product

10 for people to be using?

11 A. I formed a value judgment that it was

12 safe, certainly for me to handle.

13 Q. Did you expect that Union Carbide was

14 being totally up-front with you?

15 A. They were a reputable company, and I

16 assumed that what we were being told was correct.

17 Q. So you assumed that Union Carbide was

18 telling you the truth and giving you all the

19 knowledge you needed?

20 A. Yes, but I appreciated also that the

21 knowledge that we were looking for would take time

22 to derive.

23 Q. Some of it maybe; some of it maybe not;

24 right?

25 A. Possibly.

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1 Sayers

2 Q. I mean, they'd already done a study on

3 their Calidria asbestos, short fiber asbestos,

4 hadn't they?

5 A. A study had been undertaken, that is

6 clear.

7 Q. Sir, do you think Union Carbide had an

8 obligation to tell people where there were areas of

9 concern?

10 A. Yes, and I think that was being done.

11 We've seen the Demehl 1964 report, and I've seen a

12 copy of the '69 report. This was intended to give

13 to potential purchasers of the product.

14 Q. You think Union Carbide was giving

15 warnings because of the 1969 report and the

16 changes; is that right?

17 A. I think as knowledge became available

18 they were incorporating it into their guidance

19 notes.

20 Q. Do you know what they said to the Castor

21 Oil Company?

22 A. I don't even know the Casper Oil

23 Company.

24 Q. You all don't have castor oil over there

25 in England?

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1 Sayers

2 A. C-A-S-T --

3 Q. O-R.

4 A. Oh, castor oil, yes, it is referred to

5 children.

6 Q. I would think any kid that took it would

7 remember it.

8 Do you know what your company was

9 telling the Castor Oil Company? She's about to

10 find it. I just wonder if you know.

11 A. I have no idea what you're talking

12 about.

13 Q. I'm going to give you a document that

14 has gone into a number of different depositions but

15 we'll give it a brand-new one today.

16 MR. LANIER: Ma'am, can you tell me what

17 number should be the next one.

18 (Discussion off the record.)

19 MR. LANIER: We're going to do it as

20 9, Sayers Number 9.

21 (Sayers Exhibit 9, letter dated 7/5/72

22 from Castor Oil to DuPont, marked for

23 identification, as of this date.)

24 Q. Sir, if you would look at that. That's

25 a letter from the Castor Oil Company to a fellow at