A. Mr. Trevor Will arranged for it to be provided for me.
Q. And by that you mean the Union Carbide lawyer who's asked you all these questions?
A. Yes.
MR. WILL: Counsel, for that record, that was under Judge Alsep's [phonetic] instruction that we bring the witness to New York rather than go to Manchester.
MR. LANIER: Do I understand the judge ordered you to pay for the ticket? Is that what I'm hearing?
MR. WILL: He ordered the witness come to New York. He did not specifically order -- he said, you bring him to New York. Nobody raised the question of who would pay. But the verb used, I believe, was you bring him to New York.
MR. LANIER: So you have controlling ability to bring him to New York when the need arises?
MR. WILL: No, I had to ask Mr. Sayers if he would come.
Q. Sir, was it made clear to you your

ticket would be paid for?
A. Yes, it was.
Q. And you understand the lawyer who paid for your ticket is the Union Carbide lawyer?
A. Yes.
Q. When did you find out you had a personal lawyer in this case?
A. I didn't understand the term until yesterday.
Q. And you came to understand you had a personal lawyer yesterday?
A. Yes.
Q. Did you pick that lawyer out or did you choose a personal lawyer?
A. No, I did not.
Q. You were told that you have a Union Carbide lawyer who would also act as your personal lawyer?
A. I wasn't told it was Union Carbide per se.
Q. So that's news to you, that your lawyer that you were told represents you is also a Union Carbide lawyer?
A. If I understood it correctly, Dow had

actually bought Union Carbide, so I wasn't sure which party was being represented.
Q. Fair enough. Maybe one thing that will help is when I use "Union Carbide" or "Dow," in a sense they're interchangeable now.
A. I understand.
Q. That was not true when you worked for Union Carbide; right?
A. No.
Q. You didn't get a personal lawyer, in your mind, until yesterday; is that right?
A. I talked to Mr. Will before. When I was asked to come to the United States, I assumed that everything was in order.
Q. Had you met with any lawyers face-to-face before you came to the United States?
A. Yes. I met Mr. Will in England.
Q. And at that time was he your personal lawyer or was he just coming over to talk to you in general?
A. It was a general discussion.
Q. Tell me about it, please.
A. Mr. Will asked me about my role and duties within the Union Carbide organization, both

in the U.K. and in the Belgium operation.
Q. How long a visit was it?
A. Several hours.
Q. Where did it take place?
A. In Manchester Airport.
Q. Do you know my friend Professor Jeffrey Twedell [phonetic]?
A. No, I do not.
Q. I assume -- are you getting any kind of payment, any kind of money, any kind of compensation, anything for your work in this case?
A. I'm being paid expenses to come here.
Q. But nothing other than meals and lodging?
A. That's right.
Q. When you wrote that paper back in 1967, I bet you never dreamed it would be this important, did you?
A. That is correct.
Q. Get you a trip to the United States, get all these lawyers asking you questions 30 years later. It probably never entered your mind, did it?
A. No, it didn't.