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2 Union Carbide headquarters in New York?

3 A. It was addressed to Mr. Frank Dexter,

4 yes.

5 Q. He's also saying that to Dr. Dernehl,

6 who's at Union Carbide headquarters in New York in

7 the medical department?

8 A. Yes.

9 Q. And he's saying it to this Mr. Frangos

10 at Union Carbide headquarters in New York?

11 A. Yes.

12 Q. And he's saying it to Dr. F. Mumpton at

13 Niagara Falls, New York?

14 A. Correct.

15 Q. That's a Union Carbide research

16 facility, was it not?

17 A. It was, yes.

18 Q. And he's saying it to a Mr. Polderman at

19 office. Is that the office in --

20 A. That was the Belgium office.

21 Q. -- Belgium?

22 A. Polderman ran the Belgium office.

23 Q. Then he is saying it to Mr. Pufahl, to

24 you and to Mr. Woolery, who is also at Niagara

25 Falls.

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2 A. That's right.

3 Q. Can we conclude from this that the

4 information, then, contained in your report titled

5 "Asbestos as a Health Hazard in the United Kingdom"

6 was getting conveyed across the Atlantic Ocean to

7 the headquarters of Union Carbide by at least

8 August 1st, 1967?

9 MR. WILL: Objection to the form.

10 assumes facts not in evidence.

11 A. I don't think we can say it on the

12 basis of this letter. no. But I know that my boss,

13 Peter Cheston, had already sent the documents out

14 in May.

15 Q. He had sent the documents over to New

16 York, and now on August 14th you've got Mr. Hall

17 coming over to New York from Belgium to talk about

18 asbestos matters?

19 A. That's what it says.

20 Q. At the time he was going over, he had in

21 mind the information in your report called

22 "Asbestos as a Health Hazard in the United

23 Kingdom"?

24 MR. WILL: Objection.

25 A. I have no idea.

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2 Q. Well, he had seen it and he had read it

3 and he understood it, didn't he?

4 MR. WILL: Same objection.

5 A. I presume so, yes.

6 Q. You had at least shown it to him?

7 A. He had a copy.

8 Q. And you felt he had at least looked at

9 it and read it?

10 A. I can't recall when he had read it.

11 Q. But you would expect he would have read

12 it?

13 A. Indeed, right. Our paths crossed but

14 little at that particular point in time. We were

15 both moving.

16 (Sayers Exhibit 18, letter dated 9/13/67

17 from Hall to Dexter, Bates stamped A16698

18 through 99, marked for identification, as of

19 this date.)

20 Q. Let me show you Exhibit 18, a letter of

21 September 13, 1967, again to Mr. Frank Dexter on

22 the 45th floor of Union Carbide Corporation, 270

23 Park Avenue, New York, New York, from again your

24 boss, Dr. Thomas Hall at Union Carbide, Belgium.

25 I will ask you first, do you recognize

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2 that letter?

3 A. Yes, I do.

4 Q. Take a look at the letter after Mr. Will

5 has a chance to review it here.

6 A. Page 1 I have seen. Page 2 I'm not so

7 sure I have.

8 Q. I'm going to ask you about that, but

9 let's start with page 1.

10 MR. WILL: You don't have another copy?

11 Q. If you look at page 1, Dr. Hall is

12 telling Mr. Dexter over in New York that he is

13 enclosing with the letter a copy of the report made

14 by Ian Sayers -- that's you; right?

15 A. Yes.

16 Q. -- our asbestos representative in the

17 U.K. concerning a recent meeting he attended of the

18 Asbestos Fibers Importers Committee.

19 A. Yes.

20 Q. The details of the meeting are given in

21 the report.

22 Then somebody has written -- when he

23 says "a copy of the report," they have written the

24 word "over." If you go over, there are some

25 handwritten notes. Do you see that?