

82 1 Sayers 2 show it to the jury. 3 A. (Complies.) 4 Q. Is the bottom line on the chart the one 5 that represents the chrysotile? 6 A. Yes, it is. 7 Q. You noted that the first thing was that 8 with the equivalent mass of different types of 9 asbestos you said that less chrysotile was picked 10 up by the rats? 11 A. That's right. 12 MR. LANIER: Objection, form. 13 MR. BROWNSON: Objection, leading. 14 Q. Where is that shown on the graph? You 15 can pull that out or indicate. 16 A. That's shown by this point (indicating) 17 on the curve. 18 Q. Where is the point for how much amosite 19 was picked up in the lungs of the rats? 20 A. Much higher (indicating). 21 Q. You mentioned the clearance rate. Where 22 is the finishing clearance rate for the chrysotile? 23 MR. BROWNSON: Objection, leading. 24 A. Down here at the bottom (indicating). 25 Q. Where is it for crocidolite on the	84 1 Sayers 2 A. Yes. I moved to Brussels, Belgium. 3 Q. When you went to Brussels, did you get 4 responsibility for any products other than 5 asbestos? 6 A. Yes. We formed a small paper 7 commodities group, which included several chemicals 8 that we were also promoting in the paper industry. 9 Q. You mentioned earlier that there was, at 10 some point in your career with Union Carbide, a 11 change in the emphasis of the industries to which 12 you were marketing? 13 A. Yes. 14 Q. When did that happen? 15 A. It really commenced around the beginning 16 of 1967. Carbide had produced a product called 17 Resin Grade 144, which was a thixotropic agent. 18 Q. Was that sometimes referred to as 19 RG-144? 20 A. Also, yes. 21 Q. When was the first time that you saw 22 RG-144? 23 A. Dr. Hall had brought a few samples 24 across the Atlantic with him, but they were 25 relatively small quantities.
83 1 Sayers 2 chart? 3 A. The triangle (indicating). 4 Q. How about for the amosite? 5 A. A little higher. 6 Q. In your mind did this chart have any 7 relationship to what Dr. Timbrell had told you when 8 you visited him? 9 A. It agreed with what he was telling me. 10 MR. BROWNSON: Objection. 11 Q. The outset -- earlier in the 12 deposition you mentioned that at a certain point 13 you went from Union Carbide U.K. to Union Carbide 14 Belgium. 15 A. Yes. 16 Q. Why did that happen? 17 A. Because Dr. Hall, who was responsible 18 prior to my arrival for the promotion of the 19 asbestos product, was himself promoted. So he 20 needed somebody to come in under him to act as his 21 pair of legs. 22 Q. So you were promoted to that position? 23 A. I was. 24 Q. And then as a result of that promotion, 25 what happened? You had to move?	85 1 Sayers 2 Q. How about when did you first see a bag 3 of the material? 4 A. That was in Terneuzen in Antwerp. I was 5 on holiday with my wife and parents-in-law in 6 Austria. We returned via Antwerp. We picked it 7 back up from the Terneuzen store and brought it 8 back to the U.K. 9 Q. How did you bring it back? Where did 10 you put it? 11 A. Under my wife's feet in the car. 12 Q. You mentioned that RG-144 was a 13 thixotrope. What is that? 14 A. In layman's terms, a thixotrope is added 15 to a liquid to create what is the equivalent of a 16 Jell-O. In other words, it sets up to virtually 17 solid. But when you start stirring the Jell-O, the 18 viscosity reduces appreciably so that you can 19 actually move the liquid again. 20 Q. Can you give me an example of a kind of 21 product where you use a thixotrope? 22 A. Yes. A common thixotrope is in surface 23 coatings, paints. 24 Q. And what is the role it plays in paint, 25 for example?