

358 1 Sayers 2 A. Technical sales representative. 3 Q. And you were how old in that year? 4 A. 26. 5 Q. As you stated, you didn't have any 6 medical training? 7 A. That is true. 8 Q. Were you on the distribution list in the 9 company for medical articles and medical experiment 10 reports? 11 A. No, I most certainly wasn't. 12 Q. Mr. Sayers, you were asked some 13 questions about whether the company might have 14 breached its moral or ethical duties. Do you 15 remember that line of inquiry this morning? 16 A. Yes, I do. 17 Q. Based on what you observed and what you 18 knew, do you think Union Carbide breached any moral 19 or ethical duties regarding the sale of its 20 asbestos? 21 MR. BROWNSON: Objection, asked and 22 answered, and objection, leading. 23 A. At that point in time, I don't believe 24 so. 25 MR. WILL: That's all the redirect I	360 1 Sayers 2 Corporation, metals division; do you remember that? 3 A. I do. 4 Q. I'm just looking at that now and see 5 that was dated August 29th, 1977. Do I have that 6 date correct? 7 A. Yes, it is. 8 Q. Also, Mr. Sayers, Mr. Will had you look 9 at Sayers Exhibit Number 26, which I will show you, 10 which is a photocopy of a cover of a Union Carbide 11 Calidria asbestos brochure, is it not? 12 A. Yes. 13 Q. And that shows a blowup of a photograph 14 of the Union Carbide asbestos fibers? 15 A. It does. 16 Q. And under some questioning by Mr. Will, 17 you said that some of those might be curved? 18 A. Some of them of those fibers are 19 definitely curved. 20 Q. Well, now, earlier, though, in your 21 report when you were talking about Dr. Timbrell 22 telling you that some chrysotile was not straight 23 or was curved, you understood that what he was 24 talking about was chrysotile which has a spiral 25 pattern like that of a spring. Did you understand
359 1 Sayers 2 have at this point. Thank you, Mr. Sayers. 3 (Discussion off the record.) 4 THE VIDEOGRAPHER: 6:09 p.m. We're 5 going off the record. 6 MR. BROWNSON: We want to offer 7 Exhibit 26, Trevor. Do you have any 8 objection to it? 9 MR. WILL: No. I guess I would offer 10 24 and 25 at this point. 11 MR. BROWNSON: 24 and 25? 12 MR. WILL: Yeah. 13 MR. BROWNSON: Have they been marked? 14 MR. WILL: Yes. I gave you copies of 15 them. 16 MR. BROWNSON: I have no objection. 17 MR. WILL: That's fine. 18 (Recess taken from 6:10 to 6:13.) 19 THE VIDEOGRAPHER: The time is 6:13 20 p.m. We're back on the record. 21 EXAMINATION (continued) 22 BY MR. BROWNSON: 23 Q. Mr. Sayers, earlier Mr. Will had you 24 read from a page of a document authored by John L. 25 Myers, marketing manager, Union Carbide	361 1 Sayers 2 that, sir? 3 A. No, I didn't. 4 Q. Are you aware of the fact that that is 5 the sort of curvature that other types of 6 chrysotile have? 7 A. No, I'm not aware of that. 8 Q. A curlicue or tight-wound, spring-like 9 pattern? 10 A. No. That's news to me. 11 Q. We certainly don't see that on the 12 photograph of the Calidria asbestos in Exhibit 26, 13 do we? 14 A. No, we don't. 15 Q. What you see are some lines that are 16 straight and some that are wavy or curved? 17 A. That's correct. 18 Q. Now, Mr. Will also asked you about were 19 you aware of what disease there may or may not have 20 been among workers at the Union Carbide mine in 21 King City, California; do you remember that? 22 A. Yes, I remember the question. 23 Q. And you thought that would be important 24 information to know in order to get at the whole 25 truth here?