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1 Sayers
2 this document with this witness, just
3 like --
4 MR. WILL: I'll make copies.
5 MR. POLK: Yeah, but, Trevor, you're
6 using the document with the witness prior to
7 offering it and allowing us to object to it
8 and allowing us to review it. I object to
9 the document, period.
10 MR. WILL: No different than what was
11 done earlier.
12 Q. My question is this: Having just read
13 that statement by Mr. Myers that warnings were put
14 on in 1968 --
15 MR. BROWNSON: Objection, pleading.
16 Q. -- do you have any reason to dispute
17 what it says there?
18 MR. POLK: Objection, leading, hearsay,
19 lacks foundation.
20 A. No, I have no reason to dispute it.
21 MR. POLK: Excuse me, sir, don't answer
22 until I am completed with my objection.
23 THE WITNESS: I'm sorry.
24 MR. POLK: Okay? Thank you.
25 MR. WILL: Are you finished?

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1 Sayers
2 MR. POLK: Yes, I am. And I'm going
3 to ask for the record again, just like
4 Mr. Lanier did, please don't show the
5 witness documents until you have had us look
6 at them.
7 MR. WILL: Mr. Polk, all through
8 Mr. Brownson's examination we did exactly
9 the same thing, which was to give the
10 witness a document. I'm happy to give you a
11 copy of this.
12 MR. BROWNSON: I gave the witness only
13 documents that have been produced to me by
14 Union Carbide.
15 MR. WILL: You can have it.
16 MR. POLK: I'd like to have a copy of
17 the document so I can review it and decide
18 whether or not I want to recross this
19 witness based on a document you just used on
20 direct with him. That's a fair request, and
21 I'm asking for it now.
22 MR. WILL: I'll ask somebody to make a
23 photocopy of the document so we all have it.
24 MR. BICKS: It's a one-page document.
25 MR. POLK: That's fine, if you just

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1 Sayers
2 show it to me.
3 MR. WILL: Let's go off the video
4 record.
5 THE VIDEOGRAPHER: The time is 5:13
6 p.m. We're going off the record.
7 (Pause.)
8 THE VIDEOGRAPHER: The time is 5:16
9 p.m. We're back on the record.
10 Q. Mr. Sayers, I'm going to ask you to
11 assume that Mr. John Myers has testified that Union
12 Carbide put a warning label on its Calidria
13 asbestos in 1968.
14 A. Yes.
15 Q. Assuming he says that, do you have any
16 reason to doubt what Mr. Myers would say?
17 A. No.
18 MR. BROWNSON: Objection, leading.
19 Q. Do you have any information that would
20 tell you that Mr. Myers was wrong?
21 A. None whatsoever.
22 Q. Do you hold yourself out as an authority
23 as to when Union Carbide put warning labels on its
24 Calidria asbestos?
25 A. No, I certainly don't.

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1 Sayers
2 Q. You were asked a question by Mr. Polk
3 about warnings. In your experience in England in
4 1966 and 1967, was it common for companies to put
5 warnings on bags of material?
6 MR. POLK: I'll object. It lacks
7 foundation.
8 A. In my --
9 MR. BROWNSON: Same objection.
10 Q. Go ahead.
11 A. In my limited experience, the answer to
12 that is no.
13 Q. Mr. Polk asked you a number of questions
14 about whether you would have liked to have known
15 things about the Conwed plant. Do you remember
16 that sort of line of questions?
17 A. I do, yes.
18 Q. In responding to those questions, did he
19 mention to you that there were approximately 3,000
20 tons of amosite asbestos used in the Conwed plant?
21 MR. POLK: Object to the form,
22 argumentative.
23 MR. BROWNSON: I object as leading and
24 argumentative.
25 A. No, I didn't.