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2 A. By Mr. Trevor Will.

3 Q. When was that?

4 A. The beginning of this year, by

5 telephone.

6 Q. So if I can try to recreate the

7 chronology of events here, sometime early in 2002

8 Trevor Will called you by telephone?

9 A. Yes.

10 Q. Do you know how it was that he found

11 you?

12 A. I think his colleague had searched

13 through the 16 Ian Sayers in the U.K., and I think

14 I was the last one.

15 Q. Which colleague was that that did that

16 searching?

17 A. Name unknown. I can't remember the

18 name.

19 Q. Do you know if it was Ed Gilgren

20 [phonetic]?

21 A. It was a lady.

22 Q. Okay. Someone from Mr. Will's office?

23 A. Correct.

24 Q. In any event, they managed to find you

25 early this year, and you got a chance to speak to

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2 Trevor Will by telephone; is that right?

3 A. I did.

4 Q. What was it he told you at that time?

5 A. He told me that there was a case that he

6 was handling and proceeded to ask me a number of

7 questions relating to my previous activities with

8 Union Carbide.

9 Q. When you say he told you there was a

10 case he was handling, did he tell you that the case

11 was called Conwed versus Union Carbide?

12 A. He may have done, but I didn't register

13 it.

14 Q. So the name Conwed didn't stick in your

15 mind?

16 A. No, it didn't.

17 Q. But you understood that it was a case

18 where Union Carbide was being sued over in the

19 United States concerning asbestos; would that be

20 fair to say?

21 A. Yes, that was clear.

22 Q. And did he tell you that case was in

23 St. Paul, Minnesota?

24 A. I'm not sure about that.

25 Q. Do you know where St. Paul, Minnesota,

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2 is?

3 A. Yes, I do.

4 Q. Have you ever been there?

5 A. No.

6 Q. Do you understand now as you sit here

7 today that the case of Conwed versus Union Carbide

8 is in St. Paul, Minnesota?

9 A. Yes.

10 Q. Have you been told that there's a trial

11 in that case beginning about August 21st, 2002?

12 A. The precise date was not imparted.

13 Q. But you do understand that Union Carbide

14 has set up this videotaped deposition of you in

15 order that your testimony can be presented in that

16 trial --

17 A. Yes.

18 Q. -- in St. Paul, Minnesota?

19 A. Yes.

20 Q. So in the first telephone call you had

21 with Mr. Will, what were the questions that he

22 asked you at that point?

23 A. They were general questions about what I

24 actually did when I worked for Union Carbide in

25 London, subsequently in Brussels.

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2 Q. Can you recall the questions?

3 A. They were many and varied, really. What

4 did I actually do and what were the products that I

5 sold, what were the successes.

6 Q. I'm sorry, "what were your successes"?

7 A. Yes.

8 Q. Did he provide you any information about

9 the asbestos cases against Union Carbide in the

10 United States or in Minnesota specifically?

11 A. It was clear that there were cases

12 ongoing in the States.

13 Q. Is that the first time that you were

14 ever asked by Union Carbide to get involved in any

15 way in those asbestos cases in the United States?

16 A. Yes, it was.

17 Q. Had you heard that there were such cases

18 pending before Mr. Will called you?

19 A. No.

20 Q. After receiving that call and until the

21 time you met Mr. Will at the airport over in

22 England, between those two times, what I'm asking

23 is did Mr. Will or anybody else send you any

24 material to look at.

25 A. None at all.