

326 1 Sayers 2 that crocidolite had been implicated in 3 mesothelioma? 4 A. Yes. 5 MR. BROWNSON: Objection, leading. 6 MR. POLK: Leading. 7 Q. Why don't you turn to your report. 8 A. Yes. 9 MR. POLK: I suggest we adjourn for the 10 evening, because we're not going to get this 11 done. 12 Q. Would you look at paragraph 4.4.2 on 13 page 11 of your deposition. 14 A. Yes. 15 Q. I'm sorry, of your Exhibit 1, your 16 report. 17 A. Yes. 18 Q. It says, "On current evidence from South 19 Africa, Australia and Britain, it would appear that 20 crocidolite is mainly implicated in the development 21 of mesotheliomas." 22 A. Yes. 23 Q. Did I read that correctly? 24 A. You did. 25 Q. At the time you wrote that, did you	328 1 Sayers 2 that says, "However, cases have occurred in the 3 U.S. (16 in number between 1963 and 1965) Canada (6 4 in number, 1952 to '64) and a few in Britain in 5 which people concerned appeared to have only been 6 exposed to chrysotile." That's what the sentence 7 says? 8 A. Yes. 9 MR. BROWNSON: Objection, leading. 10 Q. Does it also say at the bottom of that 11 page, "Dr. Gilson, research director of the M.R.C. 12 Pneumoconiosis Research Unit, and his colleague, 13 Dr. Wagner, have both stated in a number of papers 14 that their major task at present is to 'establish 15 whether only one type of asbestos is responsible 16 for the development of these tumours and if other 17 varieties can be exonerated.'?" 18 MR. POLK: Objection, leading. 19 MR. BROWNSON: Objection, leading. 20 MR. POLK: The document speaks for 21 itself. 22 And let me put on the record at this 23 pace, at this pace and in this form, we're 24 going to be here either all night or we're 25 coming back tomorrow. It's now 5:20 p.m.
327 1 Sayers 2 understand that to be the case? 3 A. Generally so, yes. 4 Q. And you understood, again as set forth 5 in your report, that asbestos of some types in some 6 amounts had been associated with lung cancer? 7 MR. BROWNSON: Objection, leading. 8 Q. Is that correct? 9 A. Yes, that is correct. 10 MR. BROWNSON: Objection, leading. 11 Q. Did you have an understanding at the 12 time you wrote your report about whether or not 13 chrysotile asbestos had been demonstrated 14 scientifically to cause mesothelioma? 15 A. In my report there was reference to that 16 fact, yes. 17 Q. There was reference to the fact that it 18 had been established or that it was being 19 investigated? 20 MR. POLK: Objection, leading. 21 MR. BROWNSON: Objection, leading. 22 A. Cases had occurred in the U.S. 23 Q. Are you referring now to page -- 24 A. 11, 4.4.2. 25 Q. 11. You're referring to the sentence	329 1 Sayers 2 MR. WILL: And I'm going to state on 3 the record that for you to ask this witness 4 questions like this and try to truncate my 5 redirect is inappropriate. 6 MR. POLK: Truncate -- I'm not trying 7 to truncate your redirect at all, counsel. 8 What you just did was read from a document 9 that he has already authenticated. The 10 document speaks for itself. 11 Q. Did you write that, Mr. Sayers? 12 A. I did. 13 Q. In your mind at the time you wrote that, 14 was there an open scientific question about whether 15 chrysotile in general caused mesothelioma? 16 A. I felt there was. 17 Q. There was an open question? 18 A. Yes. 19 MR. BROWNSON: Objection. 20 Q. Did you feel it had been resolved one 21 way or the other? 22 MR. BROWNSON: Objection, leading. 23 A. I have no knowledge since then. 24 Q. At the time you wrote this, did you feel 25 the question of whether chrysotile causes