

DR. ROUSH

Transcript, July 9, 1985:

"Q How many people had skin cancer? A 15.

"Q And how many did he report had skin cancer? A 8.

"Q Now, how can there be fifteen people with skin (p. 109) cancer, and a truthful and honest investigator report to the world at large that there's only eight that have skin cancer?

"A I can't answer that.

"Q How can a truthful and honest investigator report only six cancers from all other sites, when in fact there were twelve?

"A I can't answer that.

"Q You can't answer that, Dr. Roush? A truthful, honest investigator would not and could not report six cancers of (p. 110) other sites, when in fact there were twelve from his own records. There were twelve. Isn't that correct, sir?

"A Yes.

"Q Doctor, how many bladder cancers does he report as being in the exposed group? There's a footnote at the bottom of the page there.

"A. Two.

"Q. How can a truthful, honest investigator report only two bladder cancers when, in fact, there were five, sir?

"A I don't know." (p. 111)

DR. ROUSH

Transcript, July 9, 1985:

"Q He then, having the knowledge, and he deliberately created this table, did he not, sir?

"A. Yes.

"Q Then he intentionally mislead those that were going to rely on this tape, having the knowledge that these were, in fact, the cancers that were reported to him; isn't that correct, sir?

"A I don't know his explanation to that.

"Q Doctor, he knew the facts, did he not, sir?

"A Yes, he did. (p. 112)

"Q You know, do you not know, Doctor, that what he says in this table will be used to support arguments that the dioxin does not cause these cancers? (p. 132)

"A Yes.

"Q Did you have any discussion with Dr. Suskind or Dr. Hertzberg, other than the discussion you had today about their omissions of cancers?

"A No.

"Q Dr. Roush, didn't it concern you that you saw here that these medical records show histories of cancers and Hertzberg or Suskind, rather, was not reporting these, was not reporting them in the articles that it published? Didn't it concern you, sir?

"A Yes. (p. 133)

"Q Why didn't you ask them about it?

"A We didn't have enough time." (p. 134)

DR. ROUSH

Transcript, July 10, 1985:

"Q Well, now Doctor, I will ask you again if you were in my position representing these Plaintiffs who claim that they have been exposed to a deadly contaminant, that makes them believe from what they know that they are very likely to get cancer, have a greater risk of getting cancer and this study comes out where you put in 14 cancers and leave out 14 and then you find out that many former employees were not invited. Wouldn't you wonder why those employees were not invited?

"A Yes.

"Q Why didn't you try to find out in this years time why these former employees were not invited even though they met the criteria?

"A There is no good reason. (p. 27)

"Q There isn't any good reason. Now, Doctor, another criticism of this study, there is a bias for ill persons who couldn't come to this study because they couldn't travel, isn't that correct, sir?

"A Yes, sir.

"Q Now, Doctor, what you ended up doing, then, your study then ended up examining basically the most healthy people, didn't it sir?

"A It is possible." (p. 28)