A Yes.

Q In September of 1952.

Did Dr. Hueper at that time report on the number of cases that were present in the medical literature about the association between asbestos exposure and lung cancer?

A Yes. He tried to pull together that, and he sort of ends with talking about the -- again, Dr. Merewether's publication in the UK.

Q And he reported there were at least 60 cases of asbestos cancer of the lung on the record at that time?

A That is correct.

Q Now, based upon the material that you reviewed, did there continue to be after 1952 reports in the medical and scientific literature reports on asbestos exposure and lung cancer?

A Clearly there did. A noteworthy report in 1955 a study done by Dr. Doll.

Q Who was Dr. Doll?

A Dr. Doll is an epidemiologist and noteworthy