

270 1 Sayers 2 Q. Was it fully established by 1969 when 3 you left Union Carbide? 4 A. No, I don't think it was. 5 Q. Has it been established to date? 6 A. I have less knowledge because I've been 7 really outside the industry. 8 Q. I understand you have less knowledge. 9 The question is do you have any understanding of 10 that today, just based upon whatever knowledge it 11 is that you have. In other words, do you feel 12 today, sir, that it is not yet established that 13 asbestos is harmful to human health? 14 MR. WILL: Object to the question, lack 15 of foundation. 16 A. It's a very general question, and 17 there are subquestions that fit in that, as I see 18 it. I don't think it's been fully established, no. 19 Q. What would it take for you in your 20 position today for you to conclude that asbestos is 21 hazardous to human health? 22 MR. WILL: Object to the form of the 23 question. It's vague as to conditions and 24 type of asbestos. 25 THE WITNESS: That's right.	272 1 Sayers 2 Q. Do you understand that question? 3 A. No, I don't. Would you elaborate, 4 please? 5 Q. Yes. I certainly will. For people 6 exposed to asbestos, is there any warning 7 properties that they would physically or 8 physiologically realize in terms of any particular 9 deleterious-type effects? 10 A. Immediately, do you mean? 11 Q. Correct, immediately. 12 A. Again, being a non-medical man, it's 13 only a layman's opinion. I wouldn't have thought 14 so. 15 Q. You agree that asbestos -- and we can 16 make it more specific -- Calidria asbestos doesn't 17 cause an itch, does it? 18 A. Not in my experience, no. 19 Q. It doesn't cause, for example, 20 somebody's eyes to water like an onion might; 21 correct? 22 A. That's correct. 23 Q. It doesn't even result in any immediate 24 realization of any shortness of breath or anything 25 like that, does it?
271 1 Sayers 2 Probably an article in The Lancet. 3 Q. So what you need to see is an article 4 in The Lancet that says asbestos is a hazard to 5 human health; is that correct? 6 A. I doubt that it would say that. It 7 would be more specific as to asbestos type and type 8 of disease. 9 Q. Let me ask you this: As I understand 10 it, the first time that you saw the Mellon 11 Institute report from 1966 was here today; is that 12 correct? 13 A. Yes, that's right. 14 Q. Have you read it? 15 A. No, sir, I have not. 16 Q. Do you have any recollection of doing 17 any research in The Lancet in the 1967 time frame 18 when you were doing your research? 19 A. It's too long ago to be specific about 20 the journals of my research. I haven't got the 21 source material with me. 22 Q. Do you agree that there are no warning 23 properties relative to persons being exposed to 24 asbestos? 25 A. Could you --	273 1 Sayers 2 A. It didn't, no. 3 Q. Do you know when the first time that 4 Union Carbide ever warned a user of Calidria 5 asbestos about the hazards or potential hazards 6 associated with exposure to that product? 7 A. Well, I suggest that that -- there was 8 an implied warning in the toxicology report in 9 1964. 10 Q. And what warning specifically -- point 11 out for me, if you will, on the report, the 12 toxicology report, what it is that you feel 13 constitutes an implied warning. I'm sorry, I 14 thought you had it there? 15 MR. WILL: I think it's 4, isn't it? 16 THE WITNESS: Yes. 17 MR. WILL: 3, I'm sorry. 18 A. The specific reference to the 19 regulation figure that's applied in the U.K. of 5 20 million particles per cubic foot. 21 Q. That to you is an implied warning to 22 you? 23 A. Yes. That's unequivocal. 24 Q. Anything else? 25 A. Yes, I think the whole third paragraph