Sayers

England and ask them whether or not it's okay to buy.

Of course the industry was selling asbestos, wasn't it?

MR. WILL: Objection to the form of the question, speech.

A. The asbestos industry was selling asbestos, yes, that is correct.

Q. As a result, there are a lot of people that are dying today; isn't that true?

MR. WILL: Objection, argumentative.

A. I couldn't answer that question, because I just don't know.

Q. Y'all don't have people dying of mesothelioma over in England?

A. I have no idea.

Q. You honestly haven't read in the paper about all that?

A. No.

Q. You don't keep up with the fact that people die from asbestos disease?

A. Not these days. There's an awful lot of inaccurate reporting as well. In fact, I wrote to the BBC a few years ago because of an exaggerated

Sayers

claim.

Q. Sir, you thought they were inaccurate based on the information you got; is that right? You just didn't have all the information, did you?

A. At what year? '67?

Q. Any time. Until today you hadn't seen the secret Mellon report I showed you; is that right?

MR. WILL: Objection to the form of the question.

A. I did not see that document, no.

Q. How about this one. This has been labeled PUC 34, but we're going to call it Exhibit Number 11 to your deposition.

(Sayers Exhibit 11, Calidria brochure, Bates stamped A10131 through 36, marked for identification, as of this date.)

Q. Have you ever seen Exhibit Number 11 before?

MR. LANIER: It's the Calidria brochure.

MR. WILL: No, I have it.

Q. Have you ever seen this one?

A. Is there a date on it? '68. No, I don't recall having seen that.

Sayers

Q. Well, October 1968, that's the date on it, isn't it?

A. It is. But I ceased to be involved by that time. I was selling other products for Union Carbide.

Q. This is for tape joint compounds, isn't it?

A. Yes, so it says.

Q. Turn to page 3, please. "Toxicological properties." Do you see that?

A. I do.

Q. I'm going to represent to you that this is what Union Carbide was handing out to the tape joint companies to try to get them to use Calidria. Are you with me?

A. Yes.

Q. Sir, this is over a year after your report; is that right?

A. Yes.

Q. Show me where it contains your information about mesothelioma. Take all the time you need to read it.

(Pause.)

A. It's a brief read. I can't find the

Sayers

word "mesothelioma" in the paper.

Q. Sir, in this handout there is no reflection of mesothelioma. Did you know that?

A. Yes, but it does say recently there have been reports of some cancers occurring in individuals exposed to asbestos dust but who have not developed clinical asbestosis.

Would that not include mesothelioma?

Q. Well, look at your report, and let's see how you handled it. You say there are three diseases.

A. Yes.

Q. Do you remember that part of your report?

A. Yes. Page 11.

Q. Page 11, 4.1. "Three diseases are believed to be caused by the inhalation of asbestos: asbestosis, bronchial carcinoma" -- that's cancer, isn't it?

A. Uh-huh.

Q. Is that a "yes" answer?

A. Yes.

Q. And number three, mesothelioma; right?

A. Yes.