

1 Sayers

2 MR. BROWNSON: Do you have any
3 objection if I move the introduction of the
4 exhibits I just read, 12, 13, 16, 17, 18,
5 18A, 19 and 20?

6 MR. WILL: Well, I don't think he's
7 the right witness to authenticate -- hang
8 on. Some of them --

9 MR. BROWNSON: He was for everything
10 but 20.

11 MR. WILL: Some of them I have no
12 objection to. He doesn't know 20. He
13 doesn't know 23.

14 MR. BROWNSON: I was talking about 12,
15 13, 16, 17, 18, 18A and 19 and 20.

16 MR. WILL: 12, 13, 16, 17, 18, 18A and
17 19, I have no objection to those documents.

18 MR. BROWNSON: Very good. Thank you.

19 MR. WILL: As long as we're on that
20 topic, I had offered 1 through 8 this
21 morning. We talked about those. I don't
22 think there was any objection; if there was,
23 I would offer them now. If there was.

24 MR. POLK: I don't recall. I'll
25 reserve any objections I have.

1 Sayers

2 A. Yes.

3 Q. All right?

4 A. Yes, sir.

5 Q. First of all may I please take a look at
6 your report, at least I think that's the report you
7 have in front of you. That's your original; is
8 that correct?

9 A. Yes (handing).

10 Q. Thank you.

11 (Pause.)

12 Q. Is the report that you have before you
13 something that you kept in your attic?

14 A. Yes, it is.

15 Q. Apparently there were other documents
16 that you kept in your attic but you apparently
17 discarded at some point; is that correct?

18 A. The call reports, the handwritten call
19 reports, which there were three or four files,
20 thick files, they were discarded, yes.

21 Q. Tell me, what, if anything, caused you
22 to keep the report that you have sitting in front
23 of you?

24 A. It was -- for a young gentleman, it was
25 a large and major work.

1 Sayers

2 MR. BROWNSON: I didn't have any
3 objection, but I also wanted to make sure
4 that there was no objection to 9, 10 and 11.

5 MR. WILL: 9, 10 and 11 are -- well,
6 he was not familiar with any of those, so I
7 don't -- he had never seen any of them. I
8 don't think there's any basis for admitting
9 them at this point for this witness. Those
10 are all documents he had never seen before.

11 THE VIDEOGRAPHER: The time is 3:36
12 p.m. We're back on the record.

13 EXAMINATION BY

14 MR. POLK:

15 Q. Mr. Sayers, it is now 3:36 p.m.

16 You've been at it all day. I'm going to do my best
17 not to be repetitious from the questions that were
18 asked to you by Mr. Lanier and Mr. Brownson.

19 A. Thank you.

20 Q. My name is Mike Polk -- it's spelled
21 P-O-L-K -- and I represent a whole lot of people in
22 Minnesota that work in a ceiling tile plant called
23 the Conwed plant where Union Carbide asbestos was
24 used as an ingredient in producing ceiling tile and
25 ceiling board.

1 Sayers

2 Q. And I take it it was a work that you
3 were proud of?

4 A. To a degree, yes.

5 Q. And as I gathered it from just reading
6 the report, you took a substantial amount of time
7 in preparing it; is that correct?

8 A. Overall, yes.

9 Q. And you intended that report to be as
10 informative for your superiors as possible; is that
11 correct?

12 A. That is so.

13 Q. Did the London office maintain records
14 in the normal course and scope of the business when
15 you were in London?

16 A. Yes, they did.

17 Q. And did the office that was in Brussels
18 that you worked at also maintain records in the
19 general and normal course of business?

20 A. Yes, they did.

21 Q. Would those be the typical
22 corporate-type documents that literally any
23 business in today's world or in the world in the
24 1960s would have maintained?

25 A. Yes.