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1 substance.

2 Q. Look beyond 147. What additional
3 documents have you added to this list beyond
4 document number 147 specifically for the
5 Madison County litigation?

6 A. The Belleville News, the Alton
7 Telegraph, The Metro East Journal, St. Louis
8 Post Dispatch because that is the large
9 newspaper in that area. The Sun-Times. The
10 Globe Democrat. Illinois State Register.
11 Illinois Labor Bulletin and Chicago Tribune
12 would be only there because this is a trial in
13 Illinois, and just as I did the last time, the
14 question was, is what I'm saying about the
15 availability of public information true of this
16 area too? Was this something that was
17 disseminated, publicly available in forms like
18 the newspaper?

19 Q. These articles show in your mind
20 what?

21 A. They show that there were reports
22 about asbestos danger and about a variety of
23 other disputes going on. Smoking, linked
24 asbestos work cancer. Danger in asbestos coats.
25 A variety -- as I've said here, they make

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1 different points, but they're all about either
2 the nature of the illness or how you can
3 improve the health and safety or something
4 about that links between the environment and
5 cancer between work and cancer. They wouldn't
6 be here if they didn't implicate asbestos.

7 Q. You're not going to come to a
8 trial in Madison County and testify that any
9 plaintiff ever read any document on this list,
10 are you?

11 A. As I said before, no.

12 MS. ROSENBERG: I would like to
13 clarify for the record that there are
14 exhibits, other than specific Madison
15 County exhibits, after 147 other than
16 the ones that he just talked about. I
17 mean it doesn't end with the Madison
18 County exhibits.

19 MR. GIANARIS: Sure. But my
20 question was, documents which are in
21 addition to documents he testified about
22 in West Virginia.

23 MS. ROSENBERG: That's correct.
24 They're also in addition to the ones he
25 testified about in West Virginia.

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1 MR. GIANARIS: What are those?

2 MS. ROSENBERG: The ones that
3 appear --

4 A. From 207 to 216.

5 Q. Tell me about it. Unless you
6 agree not to use them, we're going to go over
7 them.

8 A. I can go over them with you. 207
9 simply establishes that Illinois was employing
10 a threshold value limit or threshold limit
11 value for asbestos and thereby that was one
12 source of evidence about availability of
13 knowledge about asbestos, otherwise you
14 wouldn't have had --

15 Q. What was the Illinois threshold
16 limit value for asbestos?

17 A. It was five.

18 Q. You're simply going to use that
19 to illustrate --

20 A. It goes back a long way. That
21 the awareness of asbestos as a danger from
22 prolonged exposure of a heavy sort was
23 dangerous, which is exactly the point
24 established earlier in the 1920's, 1930's.

25 Q. What's next?

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1 A. Contract shipyards. What that
2 shows is an early awareness on the part of the
3 Navy about the dangerousness of asbestos and
4 the need for control. This involves standard
5 set for building of Navy ships by private
6 contractors. That is another indirect piece of
7 evidence about understanding that this was
8 early on a problem to be paid attention to.

9 Q. 209?

10 A. 209, 10, 11 and 12 are all
11 examples of correspondence by individuals with
12 the Department of Labor that asks them for
13 information about the dangers of asbestos and
14 the ways of combatting it.

15 It's an illustration that
16 ordinary people out in the world would write to
17 the Department of Labor that had been called
18 attention to, in this case the Carswell and
19 Irvan in North Carolina. It's meant to
20 illustrate the range of people who were aware
21 early on.

22 When we first did this, we didn't
23 have access. This involves using archives to
24 get to. We didn't even know that the archives
25 had personal correspondence of the kind.