

1 Sayers

2 A. I did not know that, no.

3 Q. Did you know whether or not any

4 Calidria-exposed employees prior to 1967 had been
5 diagnosed as having any type of cancers?

6 A. No, I didn't know that either.

7 Q. Did you ask Mr. Will at any time, from
8 the time that he first contacted you until today,
9 why it is that after all these years you've been
10 asked to come over here to testify?

11 A. Yes.

12 Q. What did you ask him and what did he
13 reply?

14 A. Exactly as you've said, that I am being
15 brought across for a deposition.

16 Q. Do you know how long asbestos litigation
17 has been occurring in this country against Union
18 Carbide?

19 A. No, I don't specifically.

20 Q. Do you know generally?

21 A. A number of years.

22 Q. More than a decade? Do you know that?

23 A. No, I don't.

24 Q. How do you know that it's been a number
25 of years?

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2 A. Yes, I have to say yes.

3 Q. Do you have any idea how many people who
4 worked at the Conwed paper mill in Colquet,
5 Minnesota, how many people have died as a result of
6 exposure to asbestos there?

7 A. No, I do not.

8 Q. Do you have any idea as to the number of
9 people at the Colquet, Minnesota, Conwed paper mill
10 who have become sick as a result of
11 asbestos-related diseases?

12 A. Again, no idea at all.

13 Q. I take it even if we provided you with
14 all of this information that I'm talking with you
15 about now you would not be in a position to offer
16 up any opinions as to whether or not Calidria
17 causes asbestos-related diseases because you don't
18 feel you're qualified to do so; is that correct?

19 MR. WILL: Object to the form of the
20 question, calls for rank speculation.

21 A. I'm not a medical man, therefore I
22 probably couldn't interpret anything I was shown in
23 a medical fashion to reach a conclusion.

24 MR. POLK: Off the record. If that's
25 all right with you.

1 Sayers

2 A. I think I just sort of gathered it from
3 the discussions.

4 Q. Did you ever meet Mr. Barton?

5 A. No, the name is not familiar.

6 Q. Have you ever read the deposition of
7 Dr. Thomas Hall?

8 A. No, I haven't.

9 Q. Do you have any interest in learning
10 what Dr. Hall testified to regarding the knowledge
11 of Union Carbide and its asbestos prior to 1969?
12 Would that hold any interest to you now?

13 A. I would be interested to see it, yes,
14 naturally.

15 Q. Would you also be interested in seeing
16 what Dr. Dernehl has testified to? Would that be
17 an academic interest to you?

18 A. It would purely be academic, you're
19 right.

20 Q. Is it of any interest to you to know the
21 number of people that have died as a result of
22 exposure to Calidria asbestos?

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

25 Q. Is that of any interest to you?

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2 THE VIDEOGRAPHER: The time is 4:13
3 p.m. We're going off the record.

4 (Pause.)

5 THE VIDEOGRAPHER: The time is 4:16
6 p.m. We're back on the record.

7 Q. Did you educate yourself on generally
8 dust diseases at some point before you wrote
9 your '67 report?

10 A. The education was aimed primarily at the
11 asbestos product.

12 Q. I understand that. But in the course of
13 doing your research, I take it -- and again correct
14 me if I'm wrong -- you also became at least
15 somewhat familiar with the historical perspective
16 of the silicosis problem; is that true?

17 A. I did.

18 Q. Did you ever come across articles or
19 documents or information that led you to believe
20 that it's the dust that you can't see that will
21 kill you, anything like that?

22 A. I don't think that was very apparent.

23 Q. Did you ever come across any
24 documentation, information, et cetera, that would
25 lead you to believe that it's the smaller particles