

1 Sayers
 2 particle or fiber size is most apt to reach the
 3 deepest recesses of the lungs?
 4 A. I have no idea.
 5 Q. Do you know what a micron is?
 6 A. Ten to the minus six millimeter, ten
 7 minus six.
 8 Q. Are you familiar at all with the term
 9 "submicron"?
 10 A. Yes, I am.
 11 Q. What does the term "submicron" mean to
 12 you?
 13 A. Nano.
 14 Q. Can you tell me just generally, if you
 15 have an understanding -- if you don't, tell me --
 16 of whether or not a submicron particle would be
 17 more apt to reach the alveoli in the lung as
 18 opposed to a particle greater than one micron?
 19 A. I have no idea. We would have to put it
 20 to the test.
 21 Q. And have you ever -- did you or have you
 22 ever read any articles that dealt with that
 23 subject?
 24 A. Not with that degree of specificity, no.
 25 Q. Have you ever done any research into any

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 2 type of silica-related disease issues?
 3 A. Research, no.
 4 Q. Have you gained any type of knowledge
 5 whatsoever in the context of silica or silicosis?
 6 A. Well, this was the forerunner of the
 7 asbestos situation. The Pneumoconiosis Research
 8 Unit was in fact created to investigate silicosis,
 9 miner's disease, as it was so called.
 10 Q. So is the answer to my question is yes,
 11 that you gained some knowledge?
 12 A. Yes, some knowledge, yes.
 13 Q. Do you know when the medical community
 14 first began to write about asbestos-related
 15 diseases?
 16 A. Not totally, no, I don't.
 17 Q. Do you have an opinion, as you sit here
 18 today, based on your entire work history, and
 19 education, training and experience, as to whether
 20 or not Calidria asbestos causes asbestosis?
 21 A. I couldn't make that judgment.
 22 Q. Do you know whether or not -- do you
 23 have an opinion as to whether or not Calidria
 24 asbestos causes lung cancer?
 25 A. No, I still don't.

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 2 Q. Let me ask it a different way. Do you
 3 have an opinion, as you sit here today, based upon
 4 your education, training and experience, whether or
 5 not Calidria asbestos -- whether it's possible that
 6 Calidria asbestos causes lung cancer and/or
 7 asbestosis?
 8 A. I have absolutely no idea.
 9 Q. So in other words, you have no opinion
 10 one way or another; is that correct?
 11 A. I have nothing to base an opinion upon.
 12 Q. You indicated earlier in some
 13 testimony -- and I'm sorry, I have some cursory
 14 notes here -- but that the curved shape of -- and I
 15 think you were talking in terms of chrysotile
 16 fiber?
 17 A. Conventional chrysotile fiber, yes.
 18 Q. Does not align with the air flow and
 19 gets caught, I think you said, in the nasal
 20 passages. I just want to clarify for my own
 21 information that you weren't talking about Calidria
 22 asbestos at the time; is that correct?
 23 A. At the time, no, because I was lifting
 24 that information from the document.
 25 Q. Do you know what the mean fiber length

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 2 was in 1967 of a Calidria raw fiber?
 3 A. I seem to recall 5 microns was the
 4 figure.
 5 Q. Do you know what the mean fiber length
 6 was of a processed Calidria fiber in 1967?
 7 A. No, I didn't know that figure.
 8 Q. Do you agree that the form of the
 9 Calidria fiber changes from the raw fiber to a
 10 different form once processed, or don't you know?
 11 A. I'm not sure that I knew that.
 12 Q. I thought you said that the geometry
 13 changed, but I may be wrong. That may just be an
 14 error in my notes.
 15 A. I didn't mean it if it was said.
 16 Q. Would you have appreciated to know, when
 17 you wrote your report in 1967, that the medical
 18 director of Union Carbide already knew about the
 19 disease of mesothelioma?
 20 A. That was the purpose of the report, to
 21 elicit that sort of information.
 22 Q. Do you know whether or not Union
 23 Carbide, prior to the time that you wrote your
 24 report, had employees that had been diagnosed with
 25 asbestosis?