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want to note for the record that I'm not waiving that objection.
Q. I simply want to know what your opinions are.
MR. KAY: I join in the objection.
MS. ROSENBERG: Note again for the record that these are documents on Union Carbide's exhibit list submitted in this case.
MR. GIANARIS: Understood.
MR. KAY: You're not suggesting they've been forwarded to us in advance of this deposition, are you?
MS. ROSENBERG: With respect to the other part of the case, they are on the exhibit list.
MR. GIANARIS: I understand totally. We're saying the same thing. I understand. I just didn't know that they were going to be relevant today because they weren't on the UCCM-1 through 216 nor were they part of the disclosures.
MS. ROSENBERG: I believe they

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were part of the disclosure.
MR. GIANARIS: Not the original disclosure.
A. I have no idea about the answer to this dispute.
Q. Why don't you resolve this dispute for us?
MS. ROSENBERG: I would like to note for the record Union Carbide documents are part of the initial disclosure if you care to take a look at it.
A. It's my understanding that I was expected to have some knowledge of Union Carbide's behavior in the areas relevant to what was publicly available, and what people would have been expected to know so that I can answer the question you just posed.
Q. Please answer the question, sir.
A. My answer to the question is, in a nutshell, that Union Carbide could not possibly have avoided confronting the health dangers of asbestos by 1963, '64. That the state of public knowledge was such that any firm entering that industry at that time would

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have known about the health dangers. That is opinion number one.
Opinion number two that their communication with their customers reflected a candid treatment of the scientifically available knowledge about asbestos.
Three, that Union Carbide's internal discussion as a policy matter was to be forthcoming to their customers, so that they would be trusted as suppliers of materials in the chemical world generally that were, like all chemicals, dangerous as well as beneficial.
Four, this is an opinion not about Union Carbide, but about the four depositions that I read in detail. My opinion is what they said is consistent with what I saw.
Q. What four deposition have you read in detail?
A. I'm trying to -- Myers was one for sure.
Q. John Myers?
A. John Myers is one. I can see them now. Just as you ask me, it escapes me. It's not going to come back to me.

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The four that were regularly used to report on what Union Carbide did and said were the ones that I looked at because those were the relevant ones.
Q. Did those affect your opinion regarding Union Carbide?
A. They affect my opinion regarding these people, and then I asked myself could you imagine having people, the manager of the sales force of the marketing, be a person like John Myers and be a part of a firm that would have tried to hide what was known, and it didn't seem to me plausible, but that was as far as I got.
Q. So, by reading these depositions -- I'm not trying to argue with you -- you somehow came to an opinion regarding the character of these four men and what they were capable of hiding or not hiding?
MS. ROSENBERG: Objection. Mischaracterizes the witness' previous testimony.
MR. GIANARIS: I'm just asking the question.
MS. ROSENBERG: I know, but it