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2 DuPont. Have you ever seen that letter before?
3 A. Never.
4 Q. It was given to us in the litigation.
5 It says, "We are responding to your concern about
6 the presence of asbestos" in some product "and
7 possible asbestos health hazards." Do you see
8 that?
9 A. Yes.
10 Q. Go to the second paragraph, please.
11 A. Yes.
12 Q. "The asbestos we use is a unique type
13 available from just one mine in California. It is
14 produced and processed by the Union Carbide
15 Corporation. They have run extensive medical tests
16 on this asbestos (Calidria, RG-144) and we have
17 their assurance it is non-carcinogenic."
18 Did I read that right?
19 A. You did.
20 Q. Sir, y'all have never been -- Union
21 Carbide -- I shouldn't include you. Union Carbide
22 to your knowledge has never been in a position to
23 assure people its Calidria was non-carcinogenic;
24 true?
25 A. I couldn't say that, because I left

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2 Q. In other words, you believed it?
3 A. Yes.
4 Q. You can't account for what they were
5 doing over in the United States and what they were
6 telling their customers over here, but you weren't
7 going to walk around telling customers this is
8 non-carcinogenic, were you?
9 A. No, we didn't.
10 Q. Did you know there's a difference in the
11 level of knowledge about asbestos over in the
12 United Kingdom versus the United States back in the
13 '50s and '60s?
14 MR. WILL: Object to the form of the
15 question and lack of foundation.
16 A. I couldn't have quantified it, no.
17 Q. Maybe I'm not using a good word. Were
18 you at least aware of the fact that the United
19 Kingdom was much more attuned or aggressive or
20 aware or informed about asbestos hazards than, in
21 general, the United States was?
22 MR. WILL: Object to form, foundation,
23 speculation.
24 A. I knew there was an awareness in the
25 U.K. My knowledge didn't extend to the United

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2 Carbide in '69 and I have no idea what happened
3 thereafter.
4 Q. As of 1969 Union Carbide had never been
5 in a position to assure people its Calidria was
6 non-carcinogenic; true?
7 MR. WILL: Objection to foundation. He
8 can answer with respect to his knowledge.
9 A. That is probably so.
10 Q. Well, sir, you specifically say in your
11 report something on this subject, don't you? You
12 know what I'm talking about?
13 A. Moral issues, I should imagine.
14 Q. Yes. You would imagine correctly. Page
15 15. "It therefore seems on the basis of present
16 evidence, we are not entitled under any
17 circumstances to state that our material is not a
18 health hazard."
19 Did I read that right?
20 A. Yes, you did.
21 Q. You believed that, didn't you?
22 A. That was stated on behalf of Union
23 Carbide U.K. Limited, not on behalf of their -- it
24 was a statement of fact on behalf of the London
25 office.

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2 States.
3 Q. This is a little bit out of order, but
4 I've got to ask you a couple questions because I'm
5 afraid if I'm going to lose track and not get back
6 to them. So excuse me for hopscotching around in
7 subjects; okay.
8 A. I understand.
9 Q. One of the nice things about a video is
10 we can go back and put it back together in a puzzle
11 where it will all makes sense. I've just to make
12 sure I cover everything. So I apologize to you.
13 You were making sales calls and offering
14 help to the paper industry on using Calidria within
15 paper products; is that right?
16 A. Yes.
17 Q. And we've seen some brochures and some
18 materials that the Union Carbide company had over
19 here in the States that helped promote use of
20 asbestos in paper products. Did you have access to
21 any of those materials?
22 A. I can guess to what you're referring.
23 Some of the documentation did come across, and that
24 helped us with our selling activity.
25 Q. One of the things I was really