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book that he did, which again looked at the question of auto accidents as an important source of ill-health and injury.

Thirdly, there was a post-doc, Tom Shepard, whose research work was on tobacco, who knew what about tobacco, when and what explains the presence or absence of efforts to deal with public health consequences of tobacco, of smoking.

There were many others as well, but as you can see, that was the subject matter was shifted entirely away from medical care and to questions of health. There I was, an administrator, learning in more detail, as an administrator doing reviews, about a whole new world of emphasis going back to the topics of the School of Public Health more than a decade earlier, more than fifteen years earlier.

Q. Let's stop in 1979 when you went to Yale and talk about very generally -- I'm not going to go back over it -- your previous education in teaching.

During that period of time up to 1979, would you agree with me that what you knew about asbestos was the same as what you've

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called the attentive -- what is the term used, the attentive public? Is that the term?

MS. ROSENBERG: Objection to the form. I think you're asking him to speculate as to what other people knew?

MR. GIANARIS: What other people knew?

MS. ROSENBERG: You're asking him if his understanding was the same as somebody else's. I don't know how he's supposed to know.

MR. GIANARIS: It's a term from the disclosure you gave me. You talk about attentive public throughout your trial testimony in West Virginia. So, I want to know about this attentive public.

Q. Prior to 1979 when you apparently dove into the issues of asbestos --

A. Issues of public health.

Q. Issues of public health. Prior to 1979, what you knew about asbestos, was that the same as what you would expect someone in this attentive public to know?

A. Not quite. It's close, but not

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quite.

Q. Why not? Less or more?

A. More.

Q. Explain that.

A. Attentive public is people who pay attention to public policy. That is people who read newspapers and magazines, listen to television to find out what the government is up to. That's a small proportion of the population on a regular basis, but I was a little bit more than that as illustrated by my work in health and healthcare.

All through that period, I was somewhat more alert to the particular matters of public health than would be a generally attentive person, partly because I was interested in the way by which American government worked on regular basis, and my scholarly career was built on understanding the different sorts of disputes that take place in American government. That is more than the attentive public would know.

Q. So as it relates to asbestos, you knew more than the attentive public regarding government's reaction to the issue of asbestos?

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A. Government's reaction to health disputes more generally, yes.

Q. At that time, did you know more than the attentive public regarding the dangers of asbestos?

MS. ROSENBERG: Objection to the form. I still think you're asking him to speculate as to what the public knew.

MR. GIANARIS: I apologize, but I thought that's what he was here to testify about today, what the public knew. Am I wrong about that?

MS. ROSENBERG: You haven't established any foundation.

MR. GIANARIS: This is a discovery deposition.

Q. If you can't answer the question, tell me you can't answer the question.

Do you know what I mean by the attentive public?

A. Yes, I do.

Q. Why don't you define it for me as you use the term, and then we'll go from there?

A. The attentive public is that part of the public which pays attention to