

1 article; is that what you are saying?

2 A That is true. I am not aware of every
3 single article on asbestos or mesothelioma.

4 Q In 1992 you testified that the background
5 rate of mesothelioma was two or perhaps as many as two
6 to four per million, correct?

7 A Yes.

8 Q And isn't it true, sir, that that NCI
9 article to which you refer does not take into account
10 the asbestos-caused mesotheliomas within the
11 population?

12 A Talks about the general population.

13 Q Yes.

14 A Yes.

15 Q Now, if a worker doesn't know a product that
16 the worker is using contains asbestos, and they take a
17 history from the worker, they are going -- the worker
18 is going to say, I have never been exposed to
19 asbestos, correct?

20 A When you say --

21 Q Well, you put up a bunch of studies that