Sayers

MR. WILL: Same objection.

A. I suppose so.

Q. You would have wanted to know that asbestos was hazardous, wouldn't you have, had you been the one that was working in the Conwed ceiling tile plant?

A. Any worker has that right.

Q. Sure. And you would have wanted to know that Dr. Newhouse and others in England had identified housewives that had contracted mesothelioma from exposure to asbestos. You would have wanted to know that if you were working in 1969 at the Conwed plant; true?

MR. WILL: Objection.

A. Coalinga was a different type of asbestos.

Q. I understand that's your position, sir. But as a person being exposed to asbestos, would you have wanted -- given what you knew in 1967, if you had been working at the Conwed plant in 1969, wouldn't you want -- wouldn't you have wanted to have that information available to you?

A. I think I would have expected management to have informed me, yes.

Sayers

Q. Would you have expected the producer of the product to inform your management, had you been a worker at Conwed?

A. Yes.

Q. Would you have wanted to know that Calidria asbestos caused severe and extensive fibrosis in guinea pigs, as found by the Mellon Institute in 1966, if you had been working at Conwed in 1969?

MR. WILL: Object to the form.

A. I'm not so sure I would have wanted to know that precisely if I had been an employee.

Q. And why wouldn't you have wanted to know that?

A. What I would have wanted to know was is the product dangerous, injurious to my health.

Q. And was Calidria asbestos injurious to health for the people working at Conwed in 1969 when you left the company?

MR. WILL: Objection.

A. I don't know.

Q. Was there any indications in your report that asbestos generally was injurious to health?

A. There were suggestions within the

Sayers

report, asbestos as a general topic, yes.

Q. Did you learn anything from 1967 to 1969, anything about asbestos hazards over and above what's in your '67 report?

A. Very little.

Q. Did you know in 1967 when you wrote your report that asbestos generally causes lung cancer?

A. I had read what was written in the learned text, yes.

Q. And that had shown that asbestos can cause lung cancer; correct?

A. There were suggestions.

Q. And you knew in 1967 that asbestosis could be a progressive, incurable disease; correct?

A. Yes.

Q. And you knew in 1967 when you wrote the report that asbestosis could kill a human; correct?

A. I knew that it was injurious to health.

Q. Do you think it's better to be safe than sorry?

MR. WILL: Object to the form of the question.

A. That could apply to anything.

Q. Sure, I know it could. I'm talking

Sayers

about in terms of asbestos exposure. Do you think it's better to be safe than sorry?

A. It's good to be safe, yes.

Q. And you also talked about -- do you think that the workers being exposed to Calidria asbestos in the 1967 to '69 time frame had a right to information that you had gathered and set forth in your report?

MR. WILL: Object to the form of the question.

A. Not directly, no, because I wasn't an expert.

Q. Do you think that they had a right -- if you were to assume that Dr. Dernehl, the medical director of Union Carbide, knew that asbestos caused mesothelioma as of 1967, do you think that the workers at the Conwed plant located in Colquet, Minnesota, had the right to know that?

MR. WILL: Object to form.

A. If it was known, yes, but I'm not so sure it was known.

Q. Did you possess any information whatsoever prior to you leaving Union Carbide in 1969 that Calidria asbestos did not cause