

1 Sayers
 2 you recall that question?
 3 A. I do.
 4 Q. Would you describe for me exactly -- you
 5 talked a little bit about a product that you had
 6 purchased; is that correct?
 7 A. Yes.
 8 Q. How much of that product did you buy?
 9 A. Oh, less than a liter.
 10 Q. Would you describe what your
 11 relationship was with Union Carbide or a Carbide
 12 subsidiary in purchasing that customer? How would
 13 you characterize it?
 14 A. We were doing some work on ultraviolet
 15 curing resins, and this was a photo initiator which
 16 cured and cross-linked the product.
 17 Q. Were you anything more than just a
 18 customer of Union Carbide?
 19 A. Nothing more.
 20 MR. BROWNSON: Objection, leading.
 21 Q. Nothing more than that?
 22 MR. BROWNSON: Objection, leading.
 23 A. Nothing more.
 24 Q. How would you characterize the nature of
 25 your relationship with Union Carbide? Was it as a

1 Sayers
 2 customer or something else?
 3 MR. BROWNSON: Objection, leading.
 4 A. It was purely on a supplier-customer
 5 relationship.
 6 Q. Other than that purchase of that small
 7 amount of product, is there any other relationship
 8 between your current company and Union Carbide?
 9 A. No, none.
 10 MR. WILL: At this point let's go off
 11 the record.
 12 MR. BICKS: Just before we do, I put
 13 on the record we went out and we found
 14 Mr. Polk and offered to make available our
 15 cafeteria to him, and he said that he
 16 doesn't want to eat, that he's leaving.
 17 THE VIDEOGRAPHER: The time is 5:34
 18 p.m. We're off the record.
 19 (Pause.)
 20 MR. WILL: Could I just ask, has
 21 Mr. Polk left, did he leave any instructions
 22 where we can leave him?
 23 MS. JACOBS: He left his hotel name
 24 and the room number and said we should call
 25 him.

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 2 MR. WILL: And he refused the offer of
 3 food and a break?
 4 MS. JACOBS: Yes.
 5 MR. WILL: Let's go back on the video
 6 record.
 7 THE VIDEOGRAPHER: The time is 5:36
 8 p.m. We're back on the record.
 9 Q. Mr. Sayers, it may seem like a long
 10 time ago. Mr. Lanier asked you some questions
 11 about the writing of your report. Do you recall
 12 that?
 13 A. Yes.
 14 Q. First of all, did anyone from Union
 15 Carbide ask or instruct you to write your report,
 16 Exhibit 1?
 17 A. No. It was at my own initiative.
 18 Q. Your initiative to write it?
 19 A. My initiative.
 20 Q. You were asked some questions about the
 21 information you had received from Dr. Timbrell
 22 regarding chrysotile and the cause of cancer. Do
 23 you remember that topic?
 24 A. Yes.
 25 Q. Did you go out and tell customers of

1 Sayers
 2 Union Carbide what Dr. Timbrell had told you?
 3 A. No, I didn't, because I wanted
 4 Dr. Dernehl's comments on that.
 5 Q. Do you have in front of you Exhibit 7?
 6 A. Yes.
 7 Q. For the record, that's the letter from
 8 Dr. Dernehl to Tom Hall of June 7, 1967; is that
 9 correct?
 10 A. That's right.
 11 Q. Would you look at the bottom paragraph
 12 of the first page of that letter. You saw that
 13 paragraph at approximately the time this letter was
 14 received; is that correct?
 15 A. Yes, I believe I did.
 16 Q. That bottom paragraph on the first page
 17 spills over to the second page. Does that
 18 specifically use the name Mellon Institute or
 19 Mellon study?
 20 MR. BROWNSON: Objection, leading. The
 21 document speaks for itself.
 22 A. There's no reference to Mellon in this
 23 document.
 24 Q. Now having been shown the Mellon study
 25 today by your counsel, does it appear to you