

1 Sayers
 2 Q. Sure.
 3 A. I'm sorry.
 4 MR. WILL: Can you read it back.
 5 (Record read.)
 6 A. That doesn't seem to be in the
 7 toxicology report.
 8 Q. The precise words "believe that a single
 9 brief exposure" is not?
 10 A. That's right.
 11 MR. BROWNSON: Objection, leading.
 12 Q. Do you believe that idea, though, is
 13 conveyed?
 14 MR. BROWNSON: Objection, leading.
 15 A. I do.
 16 Q. Is that the sense in which you were
 17 answering Mr. Lanier's questions on this topic?
 18 MR. BROWNSON: Objection, leading.
 19 A. Yes, it is.
 20 Q. You were asked some questions about the
 21 conversations with Dr. Timbrell, and the issue of
 22 whether --
 23 MR. WILL: Let's do that, since they
 24 took away the other document, I need to get
 25 a --

1 Sayers
 2 Q. Have you had a chance to look at that in
 3 a little more detail now?
 4 A. Yes, and I certainly see some curved
 5 fibers.
 6 Q. In addition to that picture, Exhibit 26,
 7 had you seen other photomicrographs of Union
 8 Carbide's Calidria fibers?
 9 A. I referred to that very fact this
 10 morning.
 11 Q. And how --
 12 A. In response.
 13 Q. -- do they appear in the other photos
 14 that you saw?
 15 A. To a greater or lesser degree curved
 16 relative to that picture.
 17 Q. Dr. Timbrell, you mentioned also, spoke
 18 with you about clearance of fibers from the lungs;
 19 is that correct?
 20 A. Yes.
 21 MR. BROWNSON: Objection, leading.
 22 Q. By "clearance" what did you understand
 23 him to mean?
 24 A. Elimination, in other words, dissolution
 25 of the fiber into the body fluids.

1 Sayers
 2 MR. BROWNSON: Are we taking a break?
 3 MR. WILL: Long enough for me to walk
 4 and get a document and walk back.
 5 THE VIDEOGRAPHER: The time is 5:44
 6 p.m., and we're going off the record.
 7 (Recess taken from 5:44 to 5:55.)
 8 THE VIDEOGRAPHER: The time is 5:55
 9 p.m. We're back on the record.
 10 Q. Mr. Sayers, do you recall earlier this
 11 morning Mr. Lanier showed you a picture of a
 12 photomicrograph of Union Carbide's Calidria
 13 asbestos?
 14 A. Yes, I do.
 15 (Sayers Exhibit 26, picture of
 16 photomicrograph of Union Carbide's Calidria
 17 asbestos, marked for identification, as of
 18 this date.)
 19 Q. I'm showing you what we've marked as
 20 Exhibit 26. Does that appear to you to be a copy
 21 of what he showed you?
 22 A. It appears to be exactly, yes.
 23 Q. He asked you about whether those fibers
 24 appeared straight or curved. Do you remember that?
 25 A. Yes, I do.

1 Sayers
 2 Q. And what was your view about the
 3 dissolution rate -- again, your personal idea about
 4 the dissolution rate of Calidria versus other types
 5 of chrysotile?
 6 A. Well, simply on account of its size you
 7 can imagine that micron-type particles would
 8 dissolve faster.
 9 Q. Which ones would dissolve faster?
 10 A. The Calidria asbestos being of micron
 11 sizes.
 12 Q. Do you see anything in Exhibit 6, the
 13 toxicology report, that talks about chrysotile,
 14 fibers aerodynamic properties or more rapid
 15 dissolution as identified by Dr. Timbrell?
 16 MR. BROWNSON: I object. The document
 17 speaks for itself.
 18 A. No, I don't.
 19 Q. Did you expect that every statement that
 20 you made or every item this you put in your Exhibit
 21 1, your report, would end up in the toxicology
 22 report?
 23 A. I had no idea there was going to be a
 24 second toxicology report; I hoped there was going
 25 to be. And I certainly expected some key points