

1 Sayers
 2 say, "Action taken by Union Carbide U.K. personnel
 3 is recorded" in your paper; right?
 4 A. Yes.
 5 Q. You say, "Up to date information is
 6 presented," don't you?
 7 A. I do.
 8 Q. You say, "its implications are
 9 discussed," aren't you?
 10 A. Yes.
 11 Q. Well, sir, you understand you are
 12 writing this paper because people were concerned
 13 about your asbestos product?
 14 A. Yes.
 15 Q. You didn't have all the up-to-date
 16 information in here, did you?
 17 A. So it would seem.
 18 Q. You didn't have all the Union Carbide
 19 information in here, did you?
 20 A. There was more Union Carbide information
 21 which didn't go in it.
 22 Q. Did that make you wonder why they had
 23 you, a 28-year-old kid, write this paper instead of
 24 the medical director himself, who actually had
 25 access to all this information?

1 Sayers
 2 MR. WILL: Objection to the form of the
 3 question, assumes a fact not in evidence.
 4 A. I think you misunderstand the reasons
 5 for the assembly of the document. I was meeting
 6 log jams at some customers, and I wanted some
 7 guidance and assistance. So I assembled the
 8 external information that was available.
 9 MR. LANIER: This gentleman's got to pop
 10 a tape out. It will just take one second.
 11 THE VIDEOGRAPHER: The time is 12:28
 12 p.m., August 2nd, 2002. This tape number
 13 one of the videotaped deposition of Mr. Ian
 14 Sayers.
 15 (Pause.)
 16 THE VIDEOGRAPHER: The time is 12:29
 17 p.m., August 2nd, 2002. This is tape number
 18 two of the videotaped deposition of Mr. Ian
 19 Sayers.
 20 Q. Sir, before we changed tapes, you had
 21 just answered a question and you told me the reason
 22 you prepared this paper was because of you were
 23 meeting log jams as you tried to market your
 24 asbestos; is that right?
 25 A. Yes.

1 Sayers
 2 Q. You prepared this paper because you
 3 wanted answers to questions, didn't you?
 4 A. Yes, I did so.
 5 Q. And in all the answers they sent you
 6 back, they didn't send you the study that showed
 7 your asbestos more dangerous than the others, did
 8 they?
 9 A. I didn't see a copy of that, no.
 10 Q. And in fact, the letter that Mr. Hall
 11 showed you a copy of wasn't even sent to you that
 12 talked about it; right?
 13 A. That is true.
 14 Q. So those answers didn't get to you, did
 15 they?
 16 A. Some of it clearly did, by dint of that
 17 letter, and Tom Hall was also visiting New York on
 18 occasions. So he passed on some information to me,
 19 naturally.
 20 Q. Sir, before they let you and your wife
 21 stuff a bunch of asbestos into baggies, they never
 22 told you that asbestos was more dangerous than the
 23 other kinds of chrysotile they tested; is that
 24 right?
 25 MR. WILL: Objection to the form,

1 Sayers
 2 misstates testimony.
 3 A. We haven't gotten that knowledge, no.
 4 Q. You didn't have that knowledge really in
 5 your mind until I told you today, 2002; isn't that
 6 right?
 7 A. As regards the report, no.
 8 Q. No, I am correct; right? In other
 9 words --
 10 A. Yes.
 11 Q. Let's look at a little bit more of your
 12 report. If you'll turn with me to page 4 where
 13 it's got the introduction.
 14 A. Yes.
 15 Q. It looks to me like your third -- well,
 16 as I read the introduction, I get the impression
 17 you're trying to get some additional guidance from
 18 Union Carbide.
 19 A. Yes. I stated that already.
 20 Q. You're saying here in this that over 20
 21 potential customers have raised this issue, and
 22 they want an assurance that Carbide's material will
 23 not be a source of danger; right?
 24 A. Yes.
 25 Q. If Carbide can give that assurance, then