

1 Sayers
 2 Q. In what year?
 3 A. 1967. I photo well.
 4 Q. Would you hold that up, please, for the
 5 camera?
 6 A. (Complies.)
 7 MR. LANIER: It looks a little bit by
 8 Austin Powers.
 9 MR. WILL: Counsel, I would ask that
 10 you please keep those comments to yourself.
 11 I don't think you'd do that in front of a
 12 judge, and I don't think you'd do that in
 13 front of a jury.
 14 MR. LANIER: That was a joke that
 15 would be cut out. And actually I would do
 16 it in front of a judge and a jury.
 17 Q. That's a depiction of you when you
 18 wrote the report?
 19 A. Yes, it was.
 20 Q. Who typed up the report?
 21 A. A young lady called Iris Kent, who was a
 22 secretary to Peter Cheston and myself at the time.
 23 Q. Did you decide, then, to whom to
 24 distribute the report?
 25 A. Peter Cheston issued a covering letter,

1 Sayers
 2 and he decided upon the copy list.
 3 Q. As you remember it to whom was your
 4 memorandum sent?
 5 A. As far as I can remember, Hal Reichard.
 6 Bob Woolery up in Niagara. Bud Pufahl in New York.
 7 obviously Dr. Demehl. and Tom Frangos. who was our
 8 link man in the New York office.
 9 Q. Who was Tom Hall?
 10 A. Tom Hall was my future boss when I got
 11 to Belgium.
 12 Q. Do you remember. did he get a copy of
 13 the report?
 14 A. He did. That's right.
 15 Q. Mr. Sayers. what did you hope to
 16 accomplish by writing this report?
 17 A. Well, really there were three
 18 objectives. We had accumulated some new
 19 information which we thought was worthwhile putting
 20 down into a report. Really the aim with that was
 21 to try and put it before Dr. Demehl to seek some
 22 guidance really on the basis of the '64 toxicology
 23 report.
 24 The second objective was, as you will be
 25 aware, there was a recommendation in the report to

1 Sayers
 2 work with the Pneumoconiosis Research Unit, and the
 3 proposition was made in that report.
 4 And thirdly, it was really an
 5 explanation as to why in the U.K. we haven't
 6 penetrated the market properly as much as had
 7 initially been anticipated.
 8 Q. Your sales hadn't been as great?
 9 A. That's right.
 10 MR. LANIER: Objection to form.
 11 Q. You mentioned that one of your
 12 objectives was to get Dr. Demehl to give some
 13 advice about this. What did you hope to do or
 14 expect to do with any advice Dr. Demehl gave you?
 15 A. Well, certainly pass it back to
 16 customers and prospective customers.
 17 Q. Let's take a look at the report now at
 18 page 6, paragraph 2.4. That's titled dockers;
 19 correct?
 20 A. Yes.
 21 Q. And you had previously mentioned the
 22 dockers as a group of workers who were aware of
 23 this asbestos situation?
 24 A. Yes.
 25 Q. You state in your document that "Until

1 Sayers
 2 the last few months, asbestos was imported into the
 3 U.K. in hessian bags."
 4 Is that what you say?
 5 A. That's right.
 6 Q. What is a hessian bag?
 7 A. I think the word "jute" is equally
 8 applicable. It is a jute natural fiber. It is
 9 spun and woven into a fabric from which bags were
 10 made.
 11 Q. Is that what in the U.S. we call a
 12 burlap bag?
 13 A. I believe it is.
 14 Q. Did Union Carbide asbestos ever come in
 15 hessian bags?
 16 A. Never.
 17 Q. How was it packed?
 18 A. It always arrived in kraft sacks, kraft
 19 paper sacks.
 20 Q. To your information did the dockers ever
 21 refuse to handle a shipment of Union Carbide
 22 asbestos?
 23 A. No, they didn't.
 24 Q. So this refusal had to do with other
 25 types?