

366 1 Sayers 2 photographs or photomicrographs? 3 A. I don't believe so. 4 Q. Finally, Mr. Sayers, you mentioned in 5 response to a question from Mr. Will that you 6 believe that Union Carbide did not act immorally or 7 unethically in connection with its sale of 8 asbestos; correct? 9 A. That is correct, yes. 10 Q. If in fact it is true that Union Carbide 11 had warnings on its bags of Calidria asbestos in 12 the United States before 1968 but, as you 13 testified, did not on its bags of Calidria asbestos 14 in England, would you consider that to be an 15 ethical situation? 16 A. No, because we took no further 17 deliveries from the States during that time period. 18 Q. You personally took no deliveries. Do 19 you know whether any Union Carbide asbestos was 20 shipped or used in England at any time after 1968? 21 A. I believe it wasn't. 22 Q. Do you know whether any Union Carbide 23 asbestos was shipped to England at any time in the 24 two years before 1968? 25 A. There would have been some deliveries,	368 1 Sayers 2 A. I thought that was already 3 established, that it was 1968. 4 Q. You don't know that that was 5 established. What you heard was Mr. Will say that; 6 correct? 7 A. That was in a document as well, the 8 miner's document. 9 Q. Are you of the view, then, that anything 10 that's in a document is inherently correct? 11 Because it's written on a piece of paper, that 12 makes it correct? 13 A. You can't disbelieve everything you 14 read. 15 Q. No, but you can't believe everything you 16 read either, can you? 17 A. I have to agree with that. 18 Q. Because you in fact yourself in your 19 report said that much of the publicity about 20 asbestos which you were seeing in Great Britain in 21 the 1960s was overblown or maybe should not be 22 believed; correct? 23 A. Putting labels on bags is pretty 24 factual. It started at a given date. 25 Q. But you have no personal knowledge of
367 1 Sayers 2 yes. 3 Q. If in fact those deliveries were of bags 4 of Union Carbide asbestos on which you saw no 5 warnings and there were no warnings and yet at the 6 same time Union Carbide had warnings on its bags of 7 Calidria asbestos in the United States, would you 8 consider that to be an improper situation? 9 MR. WILL: I object to the form of the 10 question. It assumes a fact not in 11 evidence. 12 A. When were the warnings applied to the 13 bags in the United States? 14 Q. Well, Mr. Will claims they were applied 15 at least four years before 1968. You heard him 16 give you that quote, didn't you? 17 MR. WILL: No. 18 A. No, I don't think so. 19 Q. You heard Mr. Will give you a quote from 20 somewhere that Union Carbide claimed they had 21 warnings on their bags in the United States at some 22 point before 1968? 23 MR. WILL: Object to the form of the 24 question. I said assume 1968. Some point 25 in 1968 was the way I phrased the question.	369 1 Sayers 2 that, do you? 3 A. I don't, no. 4 MR. BROWNSON: Thank you. That's all 5 I've got. 6 Q. Oh, I did have one other question. 7 You mentioned earlier that you would consider a 8 statement concerning asbestos authoritative if it 9 appeared in The Lancet; correct? 10 A. Yes. 11 Q. Just so we're clear, The Lancet is a 12 medical publication published in Great Britain? 13 A. That is true. 14 Q. And it's a highly regarded, 15 authoritative medical publication? 16 A. That's true. 17 Q. I think it's considered the leading one 18 in Great Britain, is it not? 19 A. Not being a medical man, I can't answer 20 that. There are probably many reputable journal. 21 Q. It is a very reputable journal? 22 A. It is, yes. 23 Q. If The Lancet published a statement that 24 says, "materials containing asbestos should be 25 clearly marked...so that adequate precautions can