IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
BEAUMONT DIVISION

CECIL SCOTT, ET AL	*	
	*	
	*	
VS.	*	CIVIL ACTION
	*	NO. B-84-1103-CA
	*	
MONSANTO COMPANY	*	

****
September 2, 1987
Volume XIII
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BEFORE THE HONORABLE JOE J. FISHER
UNITED STATES DISTRICT JUDGE, AND A JURY

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Mr. William Papageorge, Corporate Representative for the Monsanto Chemical Company.

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THE COURT: Yes, the Court will request the jury to disregard any portion of Mr. Wright's testimony that has been read. All right.

MR. POHL: Your Honor, at this time we would --

THE COURT: Do not give it any consideration or affect to Dr. Wright's deposition in regard to your deliberation as a jury in this case. Do not give it any affect or consideration in your rulings. All right.

MR. POHL: Your Honor, we would read from the deposition and offer a summary of Dan R. Bishop taken June 29, 1987. And I will read a summary and there are some questions and answers and I would ask Mr. Musslewhite to respond to the questions.

THE COURT: All right. What witness is this?

MR. MUSSLEWHITE: This is the last one that I mentioned to Your Honor of the last witness we have that was Monsanto's -- public relations man. It's a short offer.

THE COURT: You may proceed.

MR. POHL: Your Honor, in order to show the jury the witness, not at the front but later on there are some question and answers, which we would like to show on video. I'm told that they are 12 minutes long.

THE COURT: All right.

MR. POHL: Dan Bishop has a bachelor degree in journalism from the University of Missouri. He graduated in 1956. He started at Monsanto in 1966 as manager of public relations for Monsanto's agricultural division.

He is currently director of public relations for Monsanto Chemical Company. With regard to PCBs, Bishop's role was to disseminate information internally that it appeared in the news media, keep people who had some involvement with PCBs informed of what was being said and done in the public arena and serve as the point of contact for the media when they had questions concerning PCBs.

He would translate technical information and would reduce it to lay

terminology so that people could understand it.

Bishop's major goal is to insure the dissemination of factual accurate information. With regard to Monsanto's history of the use of PCBs, Bishop and others put together a "white paper".

The white paper was used as the source of his information in communicating with the news media and others regarding PCBs. The information contained in the white paper came principally from Bill Papageorge, David Wood and George Levinsksas.

Other than the information which Bishop obtained from Papageorge, Wood and Levinsksas, he made no independent inquiries but rather relied on what they had told him about PCBs.

Regarding his job of editing papers relating to PCBs, Bishop testified as follows:

(Reading from video deposition)

Q Is one of the goals that you would have in editing papers for Monsanto to be sure that the

proper message is communicated to the reader?

A My major goal is to ensure the dissemination of factual accurate information, yes.

Q And what you try to do is make sure that you have a good mental understanding of the issue; is that correct?

A Well, to the extent that my nontechnical background will permit.

Q Then you try to take your understanding of the issue and you try to communicate in an honest and truthful way to whoever the reader might be?

A Yes, and before I do that, though, I test it with my contacts to make sure that I have indeed kept the accuracy of the information.

Q And who would be the contact -- who would the contacts be as impacts the PCBs?

A The same, same ones I mentioned earlier.

Q Papageorge, Wood and Levinsksas?

A Yes.

Q And you use the word in one of your answers, "not misleading." Would one of the roles that you play be to make sure that the wording was such that the average reader could comprehend it in a way that wouldn't be calculated to mislead the reader?

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A Yes.

Q And would that be important to you?

A Yes, it would.

Q And with regard to any chemical, no matter how dangerous or nondangerous it might be, you would want to make sure that whoever the reader was that they would be presented a full, fair and accurate picture of that chemicals propensities?

A Yes.

Q As part of his job at Monsanto, Bishop collected clippings from newspapers, magazines and the scientific literature regarding PCBs. Monsanto subscribed to clipping service which gathered all such information and provided it to Monsanto.

If Monsanto considered a periodicals characterization of PCBs inaccurate, Monsanto would let them know. If a newspaper, for example, referred to PCBs as a carcinogen or a "deadly toxin," Monsanto would challenge the accuracy of such a characterization.

Such characterizations in Bishop's opinion would be grossly inaccurate based on everything he's ever been told and read. If one going to going to communicate information to the public,

you would want to err on the side of being most cautions.

Bishop has enormous confidence in the public's ability to understand an issue. "If they're given all the facts, if they're given both sides."

One of Bishop's jobs in public relations was to be sure the public was given "all the relevant facts" recording PCBs.

Monsanto issued press releases regarding the IBT's criminal trial. Regarding the relationship between IBT and Monsanto, Bishop did not know the employees of Monsanto and employees of IBT had traveled together in Europe.

Further, he did not know the dollar volume of business between IBT and Monsanto. Bishop Exhibit 6 is a memo prepared by Bishop regarding a Monsanto press release to coincide with Dr. Kimbrough's presentation to the Society of Toxicologists in Chicago, Illinois.

The press release is designated for immediate release. The press release was to coincide with Dr. Kimbrough's speech in order "to give another side to the issue."

Dr. Levinsksas had told Bishop "that Dr.

Pour was the one who had done the most thorough review of Dr. Kimbrough's work." Dr. Levinsksas also told Bishop that Dr. Pour disagreed with Dr. Kimbrough's findings.

Q Now, as to the others that looked at Dr. Kimbrough's findings, what did he tell you, if anything, about the substance of what they found?

A I don't remember discussing with anyone Dr. Levinsksas or anyone else whether or not anybody else looked at any aspect of the study. I just know that Dr. Pour's work was characterized to me as a thorough review of all of Dr. Kimbrough's work and the only one that had been done thoroughly.

Q Assume hypothetically that Dr. Levinsksas had had two other pathologists look at the same slides. Both of whom had agreed in writing that the slides demonstrated carcinogenicity. If you had known that fact, would that have been part of the complete and accurate information that you would have wanted to disseminate to the public had you been told about it?

A How do I -- I mean, I don't know how I would respond to that question. It would -- I would have to know a lot of facts that I don't know.

It would depend on the credibility of those people, their scientific credentials, whether they did a thorough job or whether they did a piece meal job, whether they were just a quick and dirty analysis and an opinion or whether it was, you know, the -- all the -- all the technical things that one with a prestigous world cancer research center like Epily would go through.

Q You don't --

A You just, you don't compare -- call research by a famous person with a study done by a graduate student, for example, or offer one as a rebuttal to the other.

Q Sure. I understand. And, so, what you are telling me is that if they had someone that did less than a thorough job, I forget what words you use --

A Yes.

Q A haphazard.

A No.

Q Quick and dirty.

A Less than thorough.

Q Quick and dirty was, I think, the words you used.

A Well, I meant less than thorough.

Q Okay. So, if other people did a less than thorough job, then there is no reason to report their findings in your proposed news release, is there?

A No. We do not report findings that are not peer reviewed and do not accept findings that are not peer reviewed. It has to pass that test are it's really not a valid scientific study. That's what I have been told over the years and I believe that. I can understand that.

Q By Dr. Levinsksas, for example, that's what he told you?

A Well, yes, among others, certainly. I mean, that's fairly common policy and knowledge, I would think. And not only with Monsanto, but within the technical community in the United States and probably the world.

Q So, that the veiw that ought to be disseminated to the public would be that of the more qualified scientist who have done the most thorough study?

A In other words, most studies, yes, most studies. They're published in technical journals, have to go through a peer review

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process by other scientists who have credentials in that area of expertise before it can be published and given authenticity, credibility, if you will. And that's the kinds of studies that Monsanto recognizes and the kinds of studies that we sponsor.

Q And so you are relying on Dr. Levinsksas to accurately and fully represent the facts to you?

A Yes, sir.

Q And you relied on what Dr. Levinsksas told you?

A Yes, sir.

Q And you were assuming that Dr. Levinsksas had accurately told you what was the -- what was a thorough and well-considered review of Dr. Kimbrough's slides by someone else?

A Yes, sir.

Q And in Dr. Levinsksas' opinion, the only one that he represented to you was Dr. Pour who reviewed Dr. Kimbrough's slides and disagreed with her findings?

A That's correct.

Q And let me see if I can approach it this way: If there had been findings that were contrary to Dr. Pour's and they -- had not been

quick and dirty but had been very well considered and had been conducted by one or more people that were very prominent in their trade and profession, is that the kind of information that you would have wanted to disseminate to the public?

You couldn't answer my question based on the information -- based on the information you have today?

A Well, the way I would answer the question would be: If another doctor, another scientist with comparable credentials to those of the people at Etily came up with different conclusions as well, that they would certainly be worthy of consideration just as his should be.

Q And you would have expected Dr. Levinsksas to tell you about that if that had happened?

A If it had been a thorough evaluation.

I would -- but he would not tell me about every partial or piecemeal less than thorough scientific observation.

Q If it was less than thorough, you're satisfied in your own mind that you really wouldn't have to consider that in your position in public relations?

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A I wouldn't consider it a valid scientific information to communicate until it was peer reviewed and thorough.

Q And if it was a thorough analysis, then it was something that you should have considered?

A Yes, it would have been.

Q Okay.

A And there were a number of analysis that we had never used because we didn't consider that they were thorough. Although, they would have supported our position on a matter, on a given matter. But we wouldn't use them.

Q Did Dr. Levinsksas ever tell you that he had obtained a written report from at least two separate pathologists, named Donovan Gordon and Ward Richter confirming Dr. Kimbrough's findings?

A Not to my knowledge. Not to as best I can recall, no.

Q Did Dr. Levinsksas ever tell you that the reason he hired Dr. Parvis Pour was to try to find somebody who would criticize Dr. Kimbrough's findings?

A No, sir.

Q Did Dr. Levinsksas tell you that he hired Dr. Pour after he had already personally looked

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at Dr. Kimbrough's findings in the presence of Drs. Squire, Gordon and Richter, all of whom confirmed carcinogenicity in his presence?

A I don't remember that.

Q He never told you that?

A Not the best I can recall, no.

Q Even to this day, he hasn't told you that?

A No, sir.

Q Let me hand you a document that's marked Levinsksas Exhibit 15, which is a letter from Dr. Gordon to Dr. Levinsksas enclosing a written report from Dr. Gordon and Dr. Richter confirming carcinogenicity in the slides by Dr. Kimbrough and ask you if Dr. Levinsksas ever to this day has shown you the documents that I'm showing you now?

A To the best of my knowledge, I have never seen any of these documents or had any knowledge of that whatsoever.

Q One of the documents has a paragraph numbered 5 above the signature line of a man named Ward R. Richter, D.B.M. diplomate, American College of Veterinary Pathology. Would you read to the Court and jury the paragraph numbered 5?

A I had nothing to do with any of this. I

have never seen it before.

Q Well, let me read the document. You tell me if I read it correctly.

"However, the lesions in Dr. Kimbrough's study were more severe than those in the Biotest study. The lesions that she and Dr. Squire are calling carcinoma are also carcinoma by my criterion. I would conclude from an examination of their material that Dr. Kimbrough's study demonstrated carcinogenicity. Signed, Ward R. Richter."

Did I read that correctly?

A That's what -- you read the words that I'm looking at, yes, sir.

Q And your testimony is, that Dr. Levinsksas never showed you this document even up until this day?

A That's correct.

Q He never communicated to you the substance of the facts that I just read aloud to you?

A Not that I recall.

(End of reading)

MR. POHL: Regarding warnings, Bishop testified as follows:

(Reading from video deposition)

Q Because of your educational background and because of your many years in advertising and public relations, I think we have established you're very skilled at the use of the English language; is that correct?

A I will accept that.

Q And did Monsanto ever consult you about how to word its warnings so that the message about any dangers associated with PCBs could be most effectively communicated to the average man?

A No, sir.

Q Or woman?

A No, sir.

(End of reading)

MR. POHL: Your Honor, at this point, we would offer a brief excerpt from this deposition on video to show the witness to the jury.

(WHEREUPON THE FOLLOWING PORTIONS OF THE VIDEO DEPOSITION WERE SHOWN TO THE JURY.)

Q References in some of your documents to the fact that PCBs were equated with common table salt?

A Uh-huh.

Q That's one of the comparisons you would like to make back in the 70's when you were dealing with PCBs?

A Well, it was --it was an analogy that people could understand and relate to. And it was recommended by our technical experts that -- that we use an analogy like that because I was looking for one to further elaborate on what mildly toxic was.

Q And who was it that suggested that you compare PCBs to table salt?

A Well, it wasn't specifically table salt. He gave us several choices. And it was Dr. Levinsksas. He would say you could compare it with table salt or motor oil.

Q I saw in the documents references to the word "mineral oil"?

A Mineral oil, as well. There is three different --

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Q Three different ones: table salt, motor oil and mineral oil?

A There were a lot of others but they would be products that I don't remember what they were but at the time I recall that at the time they were products that the public wouldn't readily identify with nor did I.

Q Do you recall what any others were today?

A No.

Q So, three products that you remember equating to PCBs in the 1970's were table salt, mineral oil and motor oil?

A Yes.

Q Was there ever a time when you stopped using the comparison of PCBs and common table salt as being accurate?

A Not as being accurate.

Q And that would be your position today as well?

A Yes, sir.

(WHEREUPON THE VIDEO DEPOSITION WAS INTERRUPTED)

THE COURT: All right.

What do you have next, Mr. Pohl?

MR. POHL: We can go ahead and read from question and answer. Mr. Musslewhite will take the stand. We will finish it up very shortly.

He can go ahead and take the stand and we'll do this --

(DISCUSSION HELD OFF THE RECORD)

MR. POHL: This was part of the first 12 minutes we were going to offer and that was all -- go ahead --

THE COURT: Proceed.

(WHEREUPON THE FOLLOWING PORTIONS OF THE VIDEO DEPOSITION WERE SHOWN TO THE JURY.)

Q Wasn't there a time when there was considerable concern, not only about health effects but also the environmental effects?

A The enviromental effects were the first issue to emerge, the subject of PCBs in the time frame when I was in the industrial chemicals companies and had a responsibility for all

products, including PCBs, yes.

Q Okay. And what was your position in public relations with regard to the environmental damage of PCBs, if any?

A That there was a growing body of knowledge that suggested that they were persistent in the environment and that precautions needed to be taken to insure that they were disposed of in the proper way.

Q Did you tell people that asked that PCBs could kill birds and fish?

A No one asked me that.

Q No one ever asked you?

A No one ever asked me that.

Q If they had of asked you, what would you have told them?

A That there is evidence to suggest that that has happened.

Q Did it ever cause you any concern that if a product could kill birds and fish that it might hurt people?

A That is something that you would have to be concerned about, certainly, to watch out.

Q Were you concerned about it?

A Yes, I was, but I was assured by our

technical people that that wasn't a problem.

Q Did you ask your technical people what their own experience has been with PCBs when they first embarked on manufacturing PCBs?

A I didn't know who the first technical people were that embarked on that back in late 20's or early 30's.

Q Did you ever make inquiry yourself to see what the human health effects were of exposure to PCBs by Monsanto workers when they first commenced making PCBs?

A I have no way or wherewithal to do that sort of thing, and it certainly wasn't within my area of responsibility, no.

Q Did you understand that Monsanto had purchased Swann Chemical Company that was the original manufacturer of PCBs?

A Yes.

Q And did you understand that Monsanto had acquired Swann Chemical Company's patent for the making of PCBs?

A Yes.

Q Okay. And did you understand that there were documents that were available to Monsanto which demonstrated the health effects associated

with this very early manufacturing of PCBs?

A No.

Q Did you ever ask Dr. Levinsksas or Mr. Papageorge or Mr. Wood if they could provide you with any documents that would show what the effects were on the Swann or Monsanto workers from their early exposure to PCBs?

A I didn't ask for documents, no.

Q Did you ask them verbally?

A I didn't have to. They told me.

Q What did they tell you?

A They told me that based on our experiences that there was no evidence to suggest that there was any concern on worker exposure.

Q So, what you are telling me is that -- Mr. Papageorge, Mr. Wood and Dr. Levinsksas told you or represented to you that from the very earliest exposures to PCBs, there was no evidence of any adverse human health effects?

A I don't know that I can say from the very earliest exposure. We were talking in the time frame of the early 1970's, early to mid-1970's. I don't know that -- I don't recall anybody ever talking about any exposure or anything earlier than that.

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Q All right. So, you don't have any recollection today of anybody at Monsanto ever having told you about any health problems associated with the manufacturing of PCBs in the 1930's?

A No, sir.

DEFENSE ATTORNEY: That is not what the witness said.

A But it is true. I do not -- I do not -- I do not have any knowledge or I don't recall having ever had any knowledge about any health effects in the 30's or 40's or 50's.

Q So, even as we speak today in June of 1987, June 29th, of 1987, you don't have any knowledge of ever having been given any information with regard to adverse health effects from the very earliest exposure to PCBs by Monsanto workers?

A I don't remember ever hearing anything about health effects or lack thereof or in any time period before the 1970's when I got involved. I never heard of PCBs until I went to work for the industrial chemicals companies in '75.

Q And you became educated on PCBs by what the company told you through the people you principally identified, who I believe, were

Papageorge, Wood and Levinsksas?

A That's basically right.

Q So, you learned about it that way?

A Yes.

Q And you never learned, that you can recall, about any adverse health effects going back into the 1930's, for example?

A No, no.

Q And you are the kind of man that if you had learned about any adverse health effects in the 1930's, you would have truthfully and accurately reported that to the media or whoever else might have made inquiry to you?

A Well, I'm the kind of man -- I'm an honest person.

Q Sure.

A Yes. And I believe in disseminating the information factually, yes. I had no knowledge of any health effects in the early 30's, 40's, 50's, or 60's.

Q And if somebody had told you about adverse health effects in the early 30's, for example, you would have truthfully and accurately passed that information on to someone who might have made inquiry of you?

A I would like to think that if there were serious health effects with a product of ours in the 30's, we wouldn't still been making it in the 60's or 70's.

(WHEREUPON THE VIDEO DEPOSITION WAS INTERRUPTED

MR. POHL: You can stop there.

Turning to Page 58, Mr. Musslewhite, line 22.

(Reading from video deposition)

Q And during any of the meetings that you had with Papageorge, Levinsksas or Wood or during any of the Monsanto sponsored luncheons, did anyone at Monsanto ever tell you that Monsanto's earliest experience with the exposures of its workmen to PCBs resulted in the yellow dystrophy of the liver in some of those workmen --

(End of reading)

MR. MUSSLEWHITE: What page did you say?

MR. POHL: 58, answer is on 59, line 4.

(Reading from video deposition)

A The presence of the sequence of events of hyper --

(End of reading)

MR. POHL: No. Page 59, line 4.

MR. MUSSLEWHITE: Well, the pages must be numbered differently in this one. Oh, this is the Richter deposition. No wonder.

MR. POHL: Let me just read the answer then.

(Reading from video deposition)

A I honestly don't recall that. I honestly do not recall.

Q Has anyone ever to this day told you that some of the long-term health effects of exposure to PCBs include liver damage?

A I'm vaguely -- I'm familiar vaguely with the health effects observed in the so-called Yusho incident in Japan.

I read some of the accounts of that in the news media and I guess at one time or another saw a technical paper that was written on the subject that I was on the distribution for. And as I

recall, people ingested great quantities of contaminated rice oil and had some health effects which it's my understanding that they recovered from and they were reversible effects.

Q And that included, I guess, the birth defects in their children?

A To my knowledge, that's never been documented as being caused by PCBs.

Q Now, let's not focus on Yu-Cheng and Yusho right now. I just want to know what Monsanto people told you about what they knew.

Did Dr. Levinsksas tell you, for example, that chronic exposure to PCBs can cause hardening or blackening of the fingernails?

A No. I don't recall that ever being said to me.

Q Did Dr. Levinsksas tell you that PCBs can cause a swelling of the mucous membrane and impair the respiratory function?

A No, not that I can recall.

Q Did Dr. Levinsksas ever tell you that exposure to PCBs can cause swelling of the eyelids?

A No. You are citing a litany of, I suppose, acute health effects from high exposure.

Q No. I'm not limiting my questions to acute in any way.

A Well, the answer in any event is no. I don't recall ever being involved in a discussion like that with anybody.

Q All right. Did Dr. Levinsksas ever tell you that severe exposure to PCBs can cause gastrointestinal problems in human beings?

A Not that I can recall.

(End of reading)

MR. POHL: Page 61.

(Reading from video deposition)

Q Do you have any recollection today of ever having told anybody from the public that might inquire whether they were from a magazine or whether they were from a newspaper or whether they were just an inquiring member of the public that any type of exposure to PCBs could cause liver damage or gastrointestinal damage?

A I don't remember.

Q You don't remember telling anybody that?

A I don't remember whether I did or didn't.

Q Well, if you don't think that it caused

those problems, how could you have told them about it?

A I didn't. I don't remember.

Q So, you didn't tell them?

A I don't remember.

Q All right.

A I just don't remember --

(End of reading)

MR. POHL: Page 63.

(Reading from video deposition)

Q If you had known in 1970's that PCBs could cause gastrointestinal problems --

(End of reading)

THE COURT: Mr. Pohl, this is too much argument. Eliminate it.

MR. POHL: All right. We'll move to the next subject. Moving to Page 116. I'll just read it, Your Honor.

(Reading from video deposition)

Q Did Dr. Levinsksas ever tell you that he had asked IBT to change the wording of some of the

conclusions of the Monsanto sponsored PCB studies?

A The only knowledge I have of anything regarding that was an article that appeared in Newsweek magazine, as I recall, after the criminal trial was concluded, which reference something about that in one of the documents that became public.

And in my capacity as director of enviromental communications, I had occasion to talk with Dr. Levinsksas about that point and he explained to me that he did have correspondence with someone at IBT but that it was based on a request to have the reports consistently reported using the same apples-to-apples comparison.

And that was the subject of a letter he sent to Newsweek which they did not publish and that is the only extent of my knowledge of that particular issue that I can remember.

(End of reading)

MR. POHL: Page 118, line 9.

(Reading from video deposition)

Q Your understanding is that he didn't ask

them to change a conclusion?

A No, sir, not a conclusion.

(End of reading)

MR. POHL: Page 123, our final offer, line 4.

(Reading from video deposition)

Q Did you have any independent understanding of the number of reports that he had had changed?

A No, sir. I wasn't aware that he had asked for changes in a number of reports. I wasn't aware of that and I'm still not to this day aware of that.

Q What number did you understand to be --

A I don't have an understanding of what -- of any reports that he asked to have conclusions changed in. I refer back to my comment earlier.

Q That is, you're not aware that he asked to have conclusions changed?

A I don't recall anything like that.

Q Okay. Let me show you, see if I can help you refresh your recollection.

A Okay.

Q A letter to Dr. Joseph Calandra at

Industrial Biotest from Dr. George J. Levinsksas which has been marked as Levinsksas Exhibit 21 and ask you first, did Dr. Levinsksas ever show you this letter marked Levinsksas 21?

A No, sir, I don't recall ever seeing this.

Q So, even to this day, June 29, 1987, no one at Monsanto has ever shown you Dr. Levinsksas' letter to Dr. Calandra at IBT dated July 18, 1975?

A No, sir.

(End of reading)

MR. POHL: And that concludes the offer from the deposition of Dan R. Bishop.

MR. SHOEBOTHAM: Your Honor, we have a very short offer from this deposition. Beginning at Page 29, line 25.

(Reading from video deposition)

Q And then sometimes you would write letters back to the newspapers or the magazines if you had some question about the articles they had published regarding PCBs?

A Sure.

Q And if you had a quarrel with them about the

way they characterized PCBs you would let them know about that, wouldn't you?

A If it was inaccurate I would. There were a lot of articles that I didn't care for the way they were characterized, but I didn't challenge them because they were entitled to their opinion. But if it was a -- if it was a factual inaccuracy, yes,

(End of reading)

MR. SHOEBOTHAM: Page 33, line 22.

(Reading from video deposition)

Q So, the three products that you remember equating to PCBs in the 1970's were table salt, mineral oil and motor oil?

A Yes.

Q Okay.

A We are talking about acute toxicity.

Q All right. That's going to be my next question.

A Yeah.

Q And when you compare PCBs to table salt, you are referring only to the acute toxicity aspects, correct?

A The immediate effects of ingestion.

(End of reading)

MR. SHOEBOTHAM: To page 53, line 7.

(Reading from video deposition)

Q Have you, you have provided some testimony regarding your background to Mr. Pohl, have you ever had any kind of chemistry background?

A No, sir, none.

Q Have you ever had any kind of toxicology background?

A No, sir.

Q You don't work or hold yourself out as a toxicologist, do you?

A No, sir.

Q Have you ever had any kind of pharmacology background?

A No, sir.

Q You have never held yourself out as a pharmacologist?

A No, sir.

Q You don't have any kind of medical background?

A No, sir.

Q Okay. Your background as I understand it in answer to Mr. Pohl's questions is in the area of journalism?

A Journalism degree, University of Missouri.

Q And your work with Monsanto has been in the Monsanto public relations department?

A Public relations and advertising.

Q I see.

A On and off.

Q Now, in your work with the public relations department with Monsanto, do you work with technical people on technical issues --

A Sure.

Q -- that might arise?

A Yes, sir.

Q Okay. And I believe you told Mr. Pohl in answer to some of his questions, that you work with some technical people at Monsanto regarding the PCB issues?

A Yes.

Q And did you find the technical people that you worked with at Monsanto regarding PCBs were open with you?

A To my knowledge, they were always very open and straightforward with me, yes.

Q Did you find that the technical people that you worked with at Monsanto back in the mid-70's would provide you information that you asked for?

A Yes.

Q And was there ever an occasion when you went to the technical people at Monsanto and asked them for a question concerning PCBs that they didn't provide you with the information that you asked for?

A No, never.

Q Did you find that the technical people that you worked with concerning PCBs were cooperative with you?

A Yes.

Q And did you find that the technical people that you worked with at Monsanto back in the mid-70's provided you with accurate information?

A To my knowledge, yes.

(End of reading)

MR. SHOEBOTHAM: That concludes our offer, Your Honor.

THE COURT: All right. What does the plaintiff have next?

MR. POHL: Your Honor, at this time we