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2 Q. Was there any discussion that Union

3 Carbide has witnesses or experts who might testify

4 that Union Carbide Calidria asbestos might not be

5 as toxic as other kinds of asbestos?

6 A. Are you talking current knowledge or

7 past knowledge?

8 Q. Current knowledge.

9 A. That has been imparted to me.

10 Q. Who imparted that to you?

11 A. Mr. Bicks.

12 MR. WILL: Wait. I'm going to interpose

13 an objection here because at a certain point

14 an attorney-client relationship was

15 established. I think we have not gotten to

16 that point.

17 MR. POLK: I disagree. I disagree.

18 The testimony of the witness is the

19 attorney-client relationship was established

20 yesterday. If the conversation took place

21 prior to yesterday, then I'd like to have

22 that.

23 THE WITNESS: That was yesterday.

24 Q. So let's establish that. Yesterday

25 you and Mr. Bicks had some discussions about

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2 current knowledge?

3 MR. WILL: Now the problem is he said

4 the conversation was yesterday. The

5 privilege is attached, and therefore you're

6 not entitled to ask anything further about

7 it.

8 Q. Before yesterday did anyone

9 representing Union Carbide or from Union Carbide

10 tell you anything about what their thinking was

11 concerning current knowledge of Calidria

12 asbestos --

13 A. No.

14 Q. -- or asbestos health hazards?

15 A. No.

16 Q. Now, when you met with Mr. Will at the

17 airport in England, did you question him about what

18 position Union Carbide was taking in the case?

19 A. Generally, yes.

20 Q. Do you recall what it was that you asked

21 him?

22 A. Nothing in great detail, no, I don't.

23 Q. Do you recall what it was that he told

24 you?

25 A. Not appreciably, no. The focal point

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2 was the content of this document.

3 Q. Did he show you any of the material from

4 Conwed in Minnesota?

5 A. No.

6 Q. Did he tell you anything about Conwed's

7 plant in Colquet, C-O-L-Q-U-E-T, Minnesota?

8 A. No.

9 Q. Had you ever heard of Conwed before you

10 met Mr. Will?

11 A. No, I hadn't.

12 Q. Was there any discussion at all between

13 you and Mr. Will or between you and anyone

14 representing Union Carbide before yesterday about

15 the fact that Union Carbide claims it was dusty in

16 the Conwed plant?

17 A. No.

18 Q. Was there any discussion between you and

19 anyone from Union Carbide or representing Union

20 Carbide about the issue of whether or not the

21 workers in the Conwed plant wore masks or

22 respirators?

23 A. No, not at all.

24 Q. Now, as long as I'm on that topic, let

25 me ask you a little bit. If we go back to when you

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2 worked for Union Carbide U.K. -- can I just call

3 that Union Carbide for discussion?

4 A. Yes.

5 Q. Back at the time you worked for Union

6 Carbide in the 1964 to 1967 time frame, when you

7 would visit these Union Carbide customers in

8 England, would you actually go into their paper

9 mills and look around?

10 A. Yes, as a prelude to a trial you would

11 often go to the machine and see how the asbestos

12 material could be best added to the papermaking

13 slurry.

14 Q. As I understand it, the customers that

15 you called upon in those years on behalf of Union

16 Carbide were principally papermaking companies; is

17 that right?

18 A. In the early days that is true.

19 Q. Can you tell me about how many

20 papermaking companies you called on on behalf of

21 Union Carbide in England?

22 A. We concentrated on the paper that

23 contained high-priced fillers, primarily titanium

24 oxide. So that limited the number of mills to 20,

25 25.