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increasingly in their publications dramatically by the 1950s worker publications, both the craft unions, the AFL and the CIO and the joint unions and many other unions, came to have documents and publications that addressed the dangers of asbestos among other dangers at the workplace.

I think the next point I would make, that I have an opinion on, is that in the post war period, after the second world war, cancer became much more prominent. Asbestosis declined as a relative preoccupation and cancer became generally a more important worry, concern in public health, and that the publication in 1955, Sir Richard Darl's work, established for some parts of the scientific community, with clarity, the association between the prolonged exposure to asbestos and cancer, lung cancer in particular.

That this set in motion a series of further investigations, some of them involved in cooperation between the labor unions and the scientists as in the case of Selikoff, exploded in the 1960s, exploded in the sense that Selikoff's findings about the

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connection between asbestos and asbestosis, asbestos and cancer and speculations about mesothelioma in the early part of 1960s received an enormous amount of attention in the general media, by which I mean newspapers, television, commentary and a wide range of magazines.

So, I would say beyond that, the public available information about asbestos came both through direct connections to asbestos and indirectly through the enormous amount of attention paid in the 1960s to smoking as a threat to health. Finally, in the mid to latter part of the '60s, certainly in the 1970s, through the concern about environmental pollution and the environmental carcinogens.

So, my opinion would be that -- this would be the nutshell -- by the early 1960s when Union Carbide entered the asbestos industry, there was sufficiently wide public availability of knowledge of asbestos danger that it would have been unlikely that a firm would have gone ahead and continued unless they had what you would call a control strategy for

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dealing with the dangers of asbestos. That is, that they would have known about the dangers of asbestos, and the only thing to do with asbestos, if you want to use it, is to use it with caution.

That led me to looking at a series of materials that I asked counsel for having to do with what Union Carbide said and didn't say about asbestos during the time from 1963, '4, that period when they got started, through OSHA and beyond, what was their posture towards providing information and how did that information conflict with or be similar to the information of the kind that I talked about earlier, particularly the information in the scientific community.

Q. This information you received regarding Union Carbide specifically?

A. That was the last body of information I looked at.

Q. Where is that information?

A. That information is in three places; one, it is a series of -- a binder really of toxicology reports that I read through, literally hundreds of, to see whether

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or not they changed their message or whether they made this message clear in what the connection was between what I knew about what was publicly available and what they said or what they wrote.

It shows up in a collection of sales reports; that is, records of conversations between salespeople from Union Carbide and their customers, the manufacturers, those who handled, turned asbestos into products.

Thirdly, I asked to see videotapes and -- both depositions and trial testimony of some of Union Carbide's most active managers in this area, so that I had some sense in what they were saying was different from or similar to what I had learned was publicly available.

Q. Where are these hundreds of toxicology reports that you reviewed?

A. I think they're here.

MS. ROSENBERG: Are you referring to Selikoff's report?

A. Selikoff's report and the toxicology reports, what I call toxicology