

Sayers

MR. BROWNSON: Objection, hearsay.

MR. LANIER: Objection to form.

A. No, that wasn't the case.

Q. As you perceived it, what was the perception about asbestos at that time?

A. Well, it was a useful material, and it was the health hazard part that was really causing the problem. There was a lot of utility in that material.

Q. So given the utility, what were people trying to do, as you perceived it?

A. They were trying to use it in a safer manner.

Q. Were they trying to find ways in which it could continue to be used?

MR. LANIER: Objection to form.

A. Oh, definitely, yes.

Q. Now, in your report you talk about lung cancer; is that correct?

A. Yes.

Q. If you look at page 11, you have a Table 1 there.

A. Yes.

Q. That reports on a certain number of

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A. That's right.

Q. Mr. Sayers, what were the years involved in the deaths that were reported at Table 1?

A. 1924 to '64.

Q. Was Union Carbide selling asbestos in Great Britain at that time?

A. I don't think any material was sold during '64.

Q. At page 5 of your report you indicate there were 500 cases of cancer of the lung and mesothelioma; correct?

A. Yes.

Q. Do you know how many of those were lung cancer and how many were mesothelioma?

A. No. There wasn't a breakdown, to my recollection.

Q. And in the discussions that you had with people and the materials that you read, was there any proposal to ban asbestos in England because of a lung cancer risk?

A. No.

Q. You also in your report discuss the disease of mesothelioma; is that correct?

A. Yes.

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deaths where asbestosis was present?

A. Yes.

Q. And a certain number where there was asbestosis and lung cancer?

A. Yes.

Q. Did you give any information in your report about examples where there was lung cancer without asbestosis?

A. No.

Q. Was there anything in your report about how many of the cases of lung cancer involve smokers?

A. No.

Q. Or involve exposure to other materials that may have caused cancer?

A. That data wasn't available.

Q. Were any of these individuals in the lung cancer table, would any of them have been exposed to Calidria?

A. Certainly not. The time wasn't right.

Q. These were people in the U.K. before Union Carbide began selling?

MR. POLK: Objection to form.

MR. LANIER: Objection to form.

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Q. I'd like to have you turn to page 11 of your report, paragraph 4.4.1. Do you see that?

A. I do.

Q. That's titled "occurrence of disease"; is that right?

A. Yes, that's right.

Q. The report states, "Mesothelioma is the most disturbing of the three diseases attributable to asbestos for two reasons. Firstly, in contrast to bronchial carcinoma it can occur in people with minimal fibrosis, i.e. only after a brief exposure which may be as little as three months. Some authorities even believe that a single brief exposure might be sufficient."

Did I read that correctly?

A. You did.

Q. What was the source of the information that you used to put in that paragraph?

A. It came from the pneumoconiosis research establishment.

Q. Also other things you had read?

MR. LANIER: Objection to form.

A. Yes, but mainly from the PRU.

Q. Did you have an opinion on whether or