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1 law firm called Pillsbury & Levinson. And
 2 he's in here also as part of my co-counsel
 3 in some other cases that I've got, and he is
 4 here to give me assistance should I fail in
 5 my tasks.
 6 I don't know who this young lady is,
 7 and I don't know anybody else in here other
 8 than those. But I'm glad to make those
 9 introductions for you, Peter, either on the
 10 record or off; it didn't matter to me.
 11 MR. BICKS: That's very kind of you.
 12 Thank you.
 13 MR. GOLDMAN: And I'm Michael Goldman,
 14 also on behalf of Conwed Corporation, from
 15 Chicago.
 16 MR. BICKS: This nice lady that
 17 Mr. Lanier referred to is one of our legal
 18 assistants, Lulanne Jacobs, who's going to
 19 be helping us today.
 20 MR. LANIER: Is he working for your
 21 law firm today or is she working for the law
 22 firm of the fellow that's taking the
 23 questioning, because it looks like she's
 24 handing him stuff? So could I know who she
 25

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1 works for?
 2 MR. BICKS: We all work together.
 3 MR. LANIER: Okay. So all of y'all
 4 represent this witness individually as his
 5 individual lawyer or do some of you
 6 represent Union Carbide and some of you
 7 represent this fellow?
 8 MR. BICKS: I think we're ready to go.
 9 Those are some of your favorite
 10 cross-examination questions.
 11 MR. LANIER: No, I'm asking you. I
 12 would like to know as an appearance today
 13 who is appearing today as this man's
 14 personal lawyer, and I am entitled to know
 15 that appearance.
 16 You expressed that you are, but now
 17 you've told me that your coworker here is
 18 helping this fellow, who never said he was
 19 this guy's lawyer. And I need to know who
 20 is this guy's lawyer on the record.
 21 MR. WILL: That's fine.
 22 For the record, both Mr. Bicks and I
 23 are representing Mr. Sayers as well as
 24 representing Union Carbide pursuant to
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1 Sayers
 2 the -- as I understand the long-standing
 3 policy that Union Carbide will supply
 4 counsel to former employees when they are
 5 asked to give testimony with respect to
 6 matters that involve their employment at
 7 Union Carbide, former employment at Union
 8 Carbide.
 9 MR. LANIER: Thank you for clarifying
 10 it.
 11 MR. WILL: Happy to do it. Ready to
 12 go?
 13 MR. LANIER: I was born ready.
 14 MR. WILL: Would you swear the
 15 witness, please.
 16 I A N C. S A Y E R S, called as a witness,
 17 having been duly sworn by the Notary Public,
 18 was examined and testified as follows:
 19 EXAMINATION BY
 20 MR. WILL:
 21 Q. Would you tell us your name, please?
 22 A. Ian Christiansen Sayers.
 23 Q. And when were you born, Mr. Sayers?
 24 A. 10th of May 1939.
 25 Q. So if my math is right, that makes you

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1 Sayers
 2 about 63 years old?
 3 A. That's so.
 4 Q. Where do you live?
 5 A. I live in a small village called
 6 Ribchester, not far from Manchester, in Lancashire
 7 in England.
 8 Q. At one point did you work for
 9 subsidiaries of Union Carbide in Europe?
 10 A. Yes, I did.
 11 Q. During what time period did you do that?
 12 A. From August 1964 through to July 1969.
 13 Q. And were there more than one subsidiary
 14 for whom you worked?
 15 A. Yes, indeed. The London office, U.K.,
 16 and later UCBEL, Union Carbide Belgium Limited.
 17 Q. Mr. Sayers, during what period of time
 18 did you work for Union Carbide U.K.?
 19 A. Between '64 and '67.
 20 Q. And then you worked in Belgium from '67
 21 through July of '69?
 22 A. That is correct.
 23 Q. Are you the author of a document titled
 24 "Asbestos as a Health Hazard in the United
 25 Kingdom"?