

Sayers

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2 A. I'm manager of the advanced concepts
3 group.
4 Q. What does the advanced concept group do?
5 A. In layman's terms it's really a blue
6 skies group, charged with finding new products for
7 our existing markets and developing processes to
8 make those products.
9 Q. Is it somewhat of an R&D department?
10 A. It's very much R&D throughout.
11 Q. You said you're the manager. Do you
12 have -- can you tell me what facilities are under
13 your control? What do you have?
14 A. Yes. I have 14 staff, and we have a
15 very large laboratory on the Blackburn site.
16 Q. Do you hold any patents?
17 A. Yes, I do, on the order of 20.
18 Q. Is that in the U.K. or where is that?
19 A. They're usually global patents.
20 Q. Do any of those have anything to do with
21 asbestos?
22 A. Nothing whatsoever.
23 Q. Have you or Scapa won any awards since
24 you've been there?
25 A. Yes. We developed a product called

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2 you were at Scapa, what division or area were you
3 working in?
4 A. I was initially marketing paper machine
5 clothing product. I then moved on to their
6 filtration division, became technical manager
7 there. I then moved off to France to open up a
8 making up unit for filters.
9 Q. Since you joined Scapa have you had any
10 exposure to asbestos?
11 A. Yes. After the French experience I came
12 back and spent two years selling paper machine or
13 asbestos/cement machine clothing.
14 Q. When you say "clothing," what is that?
15 A. These are large fabrics that run around
16 a board machine upon which cement/asbestos mix is
17 deposited and dried.
18 Q. What kind of product is made on these
19 machines?
20 A. Roofing materials, wall materials.
21 Q. Was the clothing that Scapa made itself,
22 did that have any asbestos in it?
23 A. No. It was made of nylon.
24 Q. Where did you get the asbestos exposure,
25 then?

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2 Spectra Membrane for which we got the Queen'S award
3 for Industry for Technology in 1997.
4 Q. For those of us who don't know in the
5 U.S., can you explain a little bit about what the
6 Queen'S award for Technology is?
7 A. Well, it's an award bestowed upon a very
8 limited number of companies per year, either for
9 export achievement, technological development or
10 environmental work.
11 Q. Had you worked on the project that won
12 the award?
13 A. Yes.
14 Q. Now, when you joined Scapa in 1969, did
15 they have any involvement with asbestos?
16 A. Yes, they did. They were still weaving
17 quantities of asbestos as the web in dry fabrics.
18 Q. Were you personally involved with
19 that -- let me back up a second. Is that an
20 asbestos-containing yarn?
21 A. Asbestos-containing yarn, that's right.
22 Q. Did you personally have any involvement
23 with that product line?
24 A. No. I just observed the fact.
25 Q. Then for the first ten years or so when

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2 A. Simply by visiting asbestos/cement mills
3 in the world.
4 Q. Where were those mills?
5 A. Some in the U.K., an awful lot on the
6 north African coast, Middle East, Indonesia,
7 Malaysia and Australia.
8 Q. What were the conditions like that you
9 observed in those mills?
10 A. In some of the mills, horrible.
11 Q. Horrible in what respect?
12 A. The air float material was enormous.
13 Q. What types of asbestos fibers were being
14 used in the products made on those machines?
15 A. Either crocidolite or chrysotile, but
16 not Coalinga.
17 Q. Just before Union Carbide shifted the
18 marketing of asbestos to Degussa, were you involved
19 in any marketing or last marketing efforts?
20 A. Yes. The major marketing effort was the
21 preparation of a mail shot that was going to be
22 sent to selected clients around Europe.
23 Q. And what was the mail shot? What was
24 that?
25 A. Essentially it was a brochure which was