

1 Q Are you aware of the existence of any of the
2 Chinese communications from Dr. Zhang?

3 A Yes, I am as a matter of fact. I was shocked
4 at the amount of correspondence there was and that
5 Mr. Praglin failed to discuss it the many times he said
6 there wasn't any. He had been presented apparently 600
7 pages of Chinese and yet he continues to say it doesn't
8 exist. I don't quite understand what he's talking
9 about. But he has all 600 pages.

10 Q You got involved in the asbestos litigation in
11 the middle of 2001?

12 A It must be very close to that.

13 Q That's sort of the beginning of the
14 chronology?

15 A Perhaps.

16 Q You get a call from Darrell Grams at Ford?

17 A Yes, I did.

18 Q And you'd worked with Mr. Grams previously
19 when he was at Dow or working for Dow?

20 A He was outside counsel.

21 Q And you were involved with him at the Silicon
22 breast implant litigation?

23 A That's correct.

24 Q Mr. Grams calls you up and he says are you
25 interested in looking at some papers regard regarding