product in a saline solution.
Q. Let's set that aside for a moment. Let me just ask you: It sounded earlier that you felt that Lancet was a respected journal; correct?
A. Yes.
Q. Do you know whether or not Lancet recommended to the medical community in the 1967 time frame that warnings be placed on containers of asbestos?
A. I do not know that at all.
Q. Why don't you assume for a moment that Lancet recommended that all types of asbestos be accompanied by warnings on the containers of asbestos. Had you seen that during your research or had it existed during your research, would that have been something that you would have passed on in your report?
A. Most certainly, yes.
Q. Based on your education, training and experience, would you have been critical of Union Carbide for putting a warning on the Calidria containers in 1967 after they received your report?
A. I would have needed a lot more factual evidence to go along with it.

Q. What factual evidence would you have needed?
A. An explanation as to why it was being enacted. There would had to have been a reason for that.
Q. It may be that the powers to be at Union Carbide may have concluded, based on your report, that there is a potential hazard associated with Calidria asbestos.
A. I would like to have known that.
Q. Gotcha.
Just a couple other questions with reference to substitute products.
A. Yes.
Q. Do you know anything about whether or not there were substitute products for Calidria asbestos in the industry to which you were selling in the U.K.?
MR. WILL: Can you be more specific as to which industry? The paper industry?
MR. POLK: I'm sorry, the paper industry, yes.
A. The forerunner was the mistron product, mistron vapor, which was a talc, a talc

powder.
Q. Would you happen to know whether there were any substitute products for Calidria asbestos in the ceiling tile industry?
A. No, I wouldn't know that.
Q. Do you know whether or not Union Carbide U.K. or Union Carbide Belgium --
A. Yes.
Q. -- ever put any warnings on any Calidria products sold in the U.K. or Belgium during the period of time you were employed there?
A. They did not.
Q. Do you know whether or not at any time during the period of time you were employed by Union Carbide whether Union Carbide U.S. put any warnings on any bags of Calidria asbestos?
A. I don't know that for sure, but I believe they didn't.
Q. Do you know, based on any information you've received, as to whether or not there came a time when Union Carbide started to put warnings on its bags of Calidria asbestos?
A. I have been told subsequently, recently, that they did that.

Q. And when was that?
A. The date is inexact.
Q. Do you know what the warning said?
A. No, I do not.
Q. Did you conclude, based upon the information that you received, i.e., that there was a warning put on a bag at some point in time, that Union Carbide had concluded that Calidria had the potential to harm human health?
A. That's a reasonable assumption.
Q. Do you have any information that would indicate to you what language was used on the warning that Union Carbide initially put on a bag of Calidria?
A. I have no idea.
Q. Do you have any training in respiratory protection whatsoever?
A. None whatsoever.
Q. Do you have any information concerning the filtering characteristics of any respiratory protective device?
A. Not really, no.
Q. When you say "not really," that's a kind of qualified answer. What do you mean by "not