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reports where asbestos dangers are described.
MS. ROSENBERG: I think he's talking about two different things here.
MR. GIANARIS: I realize that. I asked about the hundreds of toxicology reports.
A. The hundreds are the sales reports.
Q. Let's get this straight. This is what you said. I'm paraphrasing, toxicology reports, hundreds of them, sales reports, videotapes/depo and trial testimony.
A. Right, but can I correct that for the record?
Q. Please.
A. I didn't count them, but I remember a substantial binder of sales reports which reflected discussions with customers, and then I saw a number of examples of year by year toxicology reports having to do with describing what asbestos is like, what its dangers are and what methods you should use to control its effects.
Q. Where are they?
MS. ROSENBERG: I'm not sure of

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your question.
MR. GIANARIS: I'm asking, if they are the basis of his opinion, where are they? Did he bring them with him today?
A. I read them here in New York -- not in New York, in West Virginia.
MR. GIANARIS: I'm just going to object to the witness testifying regarding any actions or inactions or knowledge of Union Carbide specifically if I don't have the documents to look at that he's relying on for this deposition.
For the record, I was given Union Carbide, UCC-M -- I imagine the M is for Marmor -- dash 1 through dash 216. There is nothing listed on here regarding toxicology reports, sales calls or videotapes/trial testimony.
I was given this with a letter that reads, and I only received this two days ago or yesterday morning actually, "Finally we provide a list of exhibits which Professor Marmor may rely upon.

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These exhibits are a subset of the previously filed Union Carbide exhibit list, but we are providing a shorter list for your convenience."
MR. KAY: I join in the objection.
MS. ROSENBERG: The documents that Professor Marmor is referring to are on the exhibit list that you previously received. The exhibits are specific to Dr. Marmor's testimony on publicly available information, and are contained in the binder.
THE WITNESS: That's what I thought was the case.
A. This was not hidden information. I knew it was in the discussions at the trial in West Virginia, and I asked to see them.
Since I was not asked initially to concentrate on Union Carbide, because I couldn't have been doing that, I was interested only in the degree of agreement or disagreement between what I knew to be the case for other claims about asbestos from what was being said. I then read them there, and it seems to me that

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was part of the trial material, no one was hiding that information. When I then looked at the videotapes in the deposition, I wanted to be clear about it.
I can't speak to the technical dispute. I can only speak to the way in which I came to that.
Q. I appreciate that and I'm absolutely not accusing you of hiding anything. I'm simply saying that I can't be properly prepared to get your opinions today and cross-examine you without having those materials here.
MS. ROSENBERG: I'm certainly certain we can provide you with copies of documents that are on Union Carbide's exhibit list. There is no dispute about what they are. I don't know if what the procedure is, but if you would like to see copies of those, they're on Union Carbide's exhibit list.
MR. GIANARIS: I understand that, but I do not want to see them now at the middle of a deposition. I have not had time to review them or study them to