Q. You understand that the papermaking process or paper mills can make other types of paper than that. They make a great variety of papers?

A. Certainly.

Q. That would include, for instance, things like cardboard?

A. Yes:

Q. Now, in Conwed -- you may or may not know this, but the Conwed mill in Colquet, Minnesota, made acoustical ceiling tiles.

A. Yes.

Q. Were you aware of that fact?

A. I am now, yes.

Q. When did you learn that?

A. Yesterday.

Q. I want to ask you about those discussions. But do you recognize that it in fact is a papermaking mill and that those are made in a papermaking process?

A. I did not know that.

Q. In any event, I will tell you that the Conwed mill is a papermaking process and these ceiling tiles are made in a process where they

start with a slurry in a hydropulper, and then it goes onto a line and through a dryer and comes out in sheets that are cut and painted and that sort of thing.

A. I understand.

Q. Do you recognize that sort of process?

A. Yes, it's typical of the broad area.

Q. Now, when you were visiting these papermaking customers over in England in the 1964-'65 time frame, did they have these big slurry drums or hydropulpers that they used in their papermaking process?

A. Yes, they did.

Q. Did they have a name for those in England that they called them?

A. Hydropulpers.

Q. So you recognize what a hydropulper is?

A. It's a large vessel with an impeller in the bottom.

Q. In those papermaking processes or papermaking mills that you visited in England, how was it that the asbestos was added to the mix? Was it dumped into the hydropulpers?

A. It depended. For the grades where

titanium dioxide was used, which implied that the resulting paper is a fine paper, often the bag was not put into the hydropulper.

Q. Maybe I wasn't clear. I wasn't insinuating that the actual bag was put in. What I was wondering is would they open the bag and dump the contents into the hydropulper.

A. Yes. Sometimes they threw the bag in, depending upon the grade of paper, straight into the hydropulper.

Q. Did you ever have an opportunity to observe this process, where they were opening bags and dumping asbestos into the hydropulper?

A. Yes, I did, yes.

Q. Did you observe that process where they were using open fiber?

A. Open fiber wasn't used for papermaking.

Q. Did you observe the process when they were using pellets --

A. Yes.

Q. -- or pelletized fiber?

A. That is right.

Q. As far as you know, did any other asbestos companies other than Union Carbide use

pelletized asbestos or was it unique to Union Carbide?

A. It was unique to Union Carbide.

Q. So when you were observing workers in these paper mills over in England in 1964 and '65 dumping asbestos from bags -- pellets into the hydropulpers, that was the Union Carbide Calidria asbestos they were dumping?

A. It was.

Q. When you would observe them -- well, let me back up. On about how many occasions did you observe that process at work?

A. It's a long time ago, but I would guess 10 to 15 different occasions.

Q. And just so we're clear here, can you give us the time frame in years when that was?

A. That would have been 1965 and '66.

Q. On all of the occasions, those 10 to 15 occasions when you saw that going on, were the workers wearing masks or respirators?

A. I'm not sure.

Q. Do you recall ever telling any of the workers or the papermaking companies that the workers ought to be wearing masks or respirators