

1 month after Pearl Harbor.

2 MR. SMITH: For the record, Your Honor, that
3 is Plaintiff's Trial Exhibit Number 11. I will show
4 that to the jury later, in a few minutes when I put up
5 the overhead.

6 BY MR. SMITH:

7 Q Who sent that memorandum to him?

8 A I sent it to Harold Boeschstein. He
9 received it; and he noted on it, Ames, please talk
10 pronto to HB.

11 Q That is his handwriting?

12 A That is his handwriting and his initials,
13 and the memo says that EJM which means E.J. Marshall,
14 the attorney, thinks there is the germ of a major
15 strategy, and he suggests -- compilation of an
16 asbestosis file is suggested and to explore with Aetna
17 what we can get in the way of coverage in the nature
18 of public liability, and then some other steps.

19 Q Before we go any further, can you tell us
20 what you mean by that sentence, there is a germ of
21 truth --