

110

1 Sayers

2 A. That's right, yes.

3 Q. Is Exhibit 8 an example of the card with

4 the baggy of RG-144 that you were describing to me

5 earlier?

6 A. It is.

7 Q. Who was it that put the RG-144 into that

8 plastic bag?

9 A. My wife and myself.

10 Q. Where did you do that?

11 A. In our front hall in the apartment in

12 Brussels.

13 Q. Then once you had the RG-144 in the bag,

14 what did you do with the bags?

15 A. The bags were stored in an old sleeping

16 bag in the cellar at Union Carbide's premises.

17 Q. Did you seal the bag in any way?

18 A. Yes, all the bags were sealed.

19 Q. How were they sealed?

20 A. By means of a sealing device, a thermal

21 sealing device.

22 Q. Did those bags ever get sent out to

23 customers?

24 A. No, they did not.

25 Q. When you and your wife were filling

111

1 Sayers

2 these bags, that was after you had written your

3 report, Exhibit 1?

4 A. It was.

5 MR. LANIER: Objection, form.

6 Q. I'll ask you, during what period of

7 time did you fill those bags?

8 A. In the late summer of 1967.

9 Q. In '67?

10 A. Yes.

11 Q. And you wrote your report when?

12 A. In May of '67. So it was post the

13 report issuance.

14 Q. When you were filling those bags, did

15 you think you were putting your health at risk?

16 A. No, I did not.

17 Q. Did you think you were putting your

18 wife's health at risk?

19 A. Equally, no.

20 Q. Mr. Sayers, thank you very much for

21 answering my questions. Now some of the other

22 lawyers will have an opportunity to ask you some

23 questions. And then I assume you will respond to

24 them as well?

25 MR. LANIER: Objection to form.

112

1 Sayers

2 Q. Will you respond to them as well?,

3 A. Yes.

4 Q. Then I may have an opportunity to ask

5 some more when they're finished; okay.

6 A. Please do.

7 MR. WILL: Let's go off the video

8 record.

9 THE VIDEOGRAPHER: The time is 11:57

10 p.m., and we're going off the record.

11 (Pause.)

12 MR. LANIER: One thing for the written

13 record. George Shipley asked me to clarify

14 something for the record that I need to.

15 I'm not sure I said it correctly originally.

16 I am here on behalf of the Kelly-Moore

17 Paint Company in the Glenda Allphin versus

18 ACANDS case in Brazoria County where this

19 has been cross-noticed in Exhibit C. I may

20 have misspoken earlier. You pointed that

21 out to me, and I wanted to make it clear on

22 the record.

23 MR. SHIPLEY: We still have a dispute

24 whether you can really now appear for

25 Kelly-Moore in the case where you sued Union

113

1 Sayers

2 Carbide.

3 MR. LANIER: True.

4 MR. SHIPLEY: I think you're here, and

5 obviously somebody else needs to make that

6 decision.

7 MR. LANIER: True, you have correctly

8 put the two sides on the record.

9 THE VIDEOGRAPHER: The time is 12:01

10 p.m. We're back on the record.

11 EXAMINATION BY

12 MR. LANIER:

13 Q. You live in England?

14 A. I do.

15 Q. And we're in New York City; right?

16 A. That's correct.

17 Q. How did you get over here?

18 A. By means of an aircraft.

19 Q. Who bought your ticket?

20 A. It was provided for me to come here for

21 the deposition.

22 Q. Do you know who gave it to you?

23 A. I picked it up at the desk in

24 Manchester.

25 Q. Do you know who bought it?