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Q. Do you see that? The first sentence you wrote says, "There has been a general recognition that Union Carbide has shown a praiseworthy responsibility in offering a pelletised product."

Did you write that?

A. I did.

Q. Do you see that statement appearing anywhere in the 1969 toxicology report?

MR. BROWNSON: Objection. The document speaks for itself.

A. No, I don't.

Q. Turning your attention to page 6, you wrote in paragraph 2.3: "All manufacturers are aware of the probable toxic hazards, especially those already utilising asbestos in some of their products."

Did I read that correctly?

A. You did.

Q. Do you see that statement appearing anywhere in the 1969 toxicology report?

MR. BROWNSON: Objection, leading. The document speaks for itself.

A. No, I do not.

Q. Mr. Sayers, do you think that, in

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found that information if they had looked for it?

A. In they looked hard enough, yes.

Q. You were asked a question earlier about something I think it was phrased as the world's largest industrial disaster. Do you remember that question?

A. I do indeed.

MR. WILL: I'm stating for the record, by asking this I'm not waiving my prior objection to that line of inquiry.

Q. But when that question was asked of you, what was your understanding to what Mr. Polk was referring?

MR. BROWNSON: Well, the -- I object to the question as leading and also asking for the state of mind of Mr. Polk. I object on those bases.

Q. When you answered the question, to what did you think the question was addressed?

A. I think he was trying to get --

MR. BROWNSON: Objection, leading.

A. -- to get me to utter the words "Union Carbide."

Q. What incident did you think he was

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looking at it today, that -- well, let me ask you a different question.

Do you feel that from a medical perspective you're in a position to evaluate whether or not the 1969 toxicology report was accurate or inaccurate as to what the state of medical knowledge was at that point?

A. Well, with the preface that I was -- never have been a medical person, it seemed to sum up the --

MR. BROWNSON: Objection. I object this is without foundation. Go ahead.

Q. Go ahead.

A. The state of knowledge that I had presented in my report.

Q. Were you relying on Dr. Demehl or other people to make that assessment?

A. Yes, I was.

Q. Now, the information that you included in your report, Exhibit I, was that publicly available information?

A. It most certainly was, yes.

Q. Are you aware of any reason why anyone, customer of Union Carbide, anyone, couldn't have

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referring to?

MR. BROWNSON: Objection, leading and seeking the state of mind of Mr. Polk, without foundation.

A. That was reference to a serious

accident that occurred in India a few years ago.

Q. Do you remember the name of the town?

A. Bhopal.

Q. Do you personally have any knowledge about what actually caused that accident?

A. No, none whatsoever.

Q. Do you know anything about it other than Union Carbide or some subsidiary owned the facility?

A. That's the extent of my knowledge.

Q. Is that the context in which you answered Mr. Polk's question?

A. Exactly.

Q. You were asked some questions about whether you were ever given the Mellon report. Do you remember that?

A. Yes.

Q. In 1966 what was your title with the company?