

342 1 Sayers 2 whether or not there's any relationship between the 3 study that's talked about in this letter of June 4 7th and that Mellon study you were shown? 5 MR. BROWNSON: Objection, leading. 6 A. That's a little difficult for me 7 because the viewing of the Mellon study was very 8 cursory. 9 Q. From what you understood about the 10 viewing of the Mellon study, it did talk about 11 injecting, intratracheally, asbestos; is that 12 correct? 13 A. Yes, that's correct. 14 MR. BROWNSON: Objection, leading. 15 Q. It involved guinea pigs, rats and 16 rabbits? 17 A. Yes. 18 MR. BROWNSON: Objection, leading. 19 Q. Those things are all mentioned in the 20 letter of June 7th, 1967? 21 MR. BROWNSON: Objection, leading. 22 A. Yes. 23 Q. Does the June 7, 1967, letter mention 24 the use of a Johns Manville fiber in the study? 25 A. It did.	344 1 Sayers 2 MR. BROWNSON: Objection, leading. 3 A. Yes. 4 Q. For Mr. Brownson I will ask you, 5 approximately when did you receive this information 6 in this June 7, 1967, letter? 7 A. In Tom Hall's office at sometime after 8 that date. 9 Q. A long time after or shortly after? 10 A. I wasn't in Brussels till August, so I 11 suspect that it was a couple of months. 12 Q. Approximately August of '67? 13 A. Yeah, yeah. 14 Q. Thank you. 15 Do you have in front of you Exhibit 6, 16 which is the 1969 toxicology report? 17 A. Yes, I have. 18 Q. Do you also have in front of you your 19 report? 20 A. I have. 21 Q. I'd like you to turn to paragraph 22 4.4.2 -- actually I, 4.4.1 in your report. 23 A. Right. 24 Q. Mr. Lanier directed your attention to 25 the statement in paragraph 4.4.1: "Some
343 1 Sayers 2 Q. Did the Mellon study that you were shown 3 mention the use of a Johns Manville fiber? 4 A. Yes, it did, entitled JM. 5 Q. Yes. 6 Again, Mr. Lanier didn't mark it but the 7 Mellon study -- as he indicated to you, it showed 8 more fibrosis with the Coalinga product? 9 A. Yes, that is correct. 10 Q. Does that indication also appear in the 11 letter of June 7, 1967? 12 A. Yes, it does. 13 Q. Acknowledging for a moment you didn't 14 have an opportunity to compare the two documents -- 15 A. That's true. 16 Q. -- in detail, does it appear to you at 17 least from this initial comparison that they're 18 talking about the same thing? 19 MR. BROWNSON: Objection, asked and 20 answered. 21 A. I could believe that the origin was 22 the Mellon study for this letter, yes. 23 Q. In any event, you had this information 24 in the June 7, 1967, letter certainly as of the end 25 of June 1967?	345 1 Sayers 2 authorities even believe that a single brief 3 exposure might be sufficient." 4 Do you see that? 5 A. I do. 6 Q. I want to direct your attention to the 7 bottom paragraph on the first page of Exhibit 6 8 where the statement appears: "These tumors, while 9 rather few in number to date, may occur in 10 individuals with histories of only slight 11 exposures." 12 Does that language appear? 13 A. Yes, it does. 14 Q. In your mind do these two sentences 15 convey the same or different ideas? 16 A. I would conclude that they do convey the 17 same message. 18 Q. So in your mind is it accurate to say 19 that Dr. Dernehl did not include anything in the 20 toxicology report regarding the statement in your 21 materials that some authorities even believe that a 22 single brief exposure might be sufficient? 23 MR. BROWNSON: Objection, leading, asked 24 and answered, and without foundation. 25 A. Could you repeat that question?