

18

1 Sayers

2 A. Yes, I am.

3 Q. Do you have a copy of that document with

4 you?

5 A. Yes, I do (indicating).

6 (Sayers Exhibit I, document titled

7 "Asbestos as a Health Hazard in the United

8 Kingdom" by Sayers, Bates stamped ICS-001

9 through 020, marked for identification, as

10 of this date.)

11 MR. WILL: At this time I'd like to

12 offer in evidence Exhibit I, Sayers Exhibit

13 I, which is a copy of that document.

14 MR. BROWNSON: No objection. Well,

15 wait a minute here. That copy is different

16 than the copy we've got.

17 MR. WILL: For the record, I've handed

18 copies to Mr. Brownson and to Mr. Lanier.

19 Q. Mr. Sayers, would you tell us, is the

20 document that you brought with you today a copy

21 that you had retained when you left Union Carbide?

22 A. Yes.

23 Q. When you wrote -- first of all, what is

24 the date when you wrote that document?

25 A. 12th of May 1967.

19

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2 Q. And if we look at the last page of the

3 document, it says there 12/5/67.

4 A. Yes. That's the British nomenclature.

5 Q. Now, when you wrote this document, were

6 you a medical doctor?

7 A. Not at all.

8 Q. Have you had any formal medical

9 training?

10 A. None whatsoever.

11 Q. What formal education have you had?

12 A. I have a BSC degree in chemistry from

13 the University of London.

14 Q. That's a bachelor of science degree?

15 A. That's right.

16 Q. When did you get that degree?

17 A. 1964.

18 Q. After you graduated from the University

19 of London, did you start with Union Carbide?

20 A. Yes, I did.

21 Q. What was your initial position with

22 Union Carbide?

23 A. I joined as a sales correspondent in the

24 ferro-alloys division.

25 Q. What did a sales correspondent do?

20

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2 A. Arranged the delivery of various types

3 of ferro-alloys in briquets to the steel and

4 foundry industry.

5 Q. How did you first get involved with the

6 sales or marketing of asbestos?

7 A. My boss, Peter Cheston, was assigned the

8 task to promote asbestos in the U.K., and he had

9 learned that I had had previous experience in paper

10 mills in Europe through university vocation jobs,

11 and he sought my assistance.

12 Q. During what period of time was this when

13 he approached you for assistance?

14 A. It was the tail end of 1964.

15 Q. And at some point did you then become

16 responsible for marketing asbestos?

17 A. I was appointed to the position of

18 technical sales representative in early 1965.

19 Q. Now, was there anybody else who was

20 responsible for marketing Union Carbide's asbestos

21 at that point?

22 A. Apart from Peter and myself, no.

23 Q. How big was the Union Carbide office in

24 London at that time?

25 A. In personnel terms?

21

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2 Q. Yes, personnel terms.

3 A. There were two -- two divisions on the

4 site, a chemical division below us and alloys.

5 There were about eight people.

6 Q. What was your reaction when you were

7 given this opportunity to become sales

8 representative for asbestos?

9 A. I was delighted because I wanted to

10 follow the paper technology through my career, and

11 this afforded me the opportunity to do just that.

12 Q. And how was asbestos being marketed to

13 the paper industry at that point?

14 A. By visiting technical managers of paper

15 mills and explaining to them the potential benefits

16 of the product.

17 Q. What were those potential benefits?

18 A. Essentially there were two. The very

19 fine fibers contained in the Coalinga chrysotile

20 material in a papermaking slurry possessed a

21 positive charge. Now, in a papermaking slurry,

22 most of the constituents like cellulosic pulp and

23 fillers carry a negative charge. So in a way this

24 was an inorganic glue.

25 On the other hand, pitch problems, these