

1 Q Back in December of 1980, did you have an
2 understanding of the cause of Mr. Vandergucht's
3 malignant mesothelioma?

4 A I did not.

5 Q When is it that you learned of the cause of
6 malignant mesothelioma?

7 A I would say the first indication of the
8 relationship between malignant mesothelioma or
9 pulmonary malignant mesothelioma and any substance was
10 what I say in lay articles.

11 Q You say lay articles?

12 A Such as newspapers, magazines.

13 Q Would that have been within the last few
14 years or so?

15 A Within the last two or three.

16 Q Back in 1980 you did not have an
17 understanding of the relationship between mesothelioma
18 and asbestos?

19 A I did not.

20 Q And I assume, did you -- therefore, you had
21 no ability to communicate that to Mr. or Mrs.