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2 Q. '64.

3 Let me see if I can ask some real

4 general questions, and then maybe I can shorten

5 this up a little bit.

6 When you went to work for Union Carbide

7 in 1964, did you have an understanding that

8 asbestos was hazardous?

9 A. Before joining Union Carbide I probably

10 had no idea.

11 Q. At what point did you become aware that

12 asbestos was hazardous?

13 A. I became aware that there were

14 allegations of it being hazardous during 1965 when

15 I started as a sales representative.

16 Q. What was the information that you had

17 then that led you to believe that?

18 A. Customer comments and then obviously

19 when researchers found the factory inspector

20 regulations and their work from there.

21 Q. Did you ever have the opportunity to

22 review the regulations that existed in the U.K. in

23 about 1965 concerning asbestos?

24 A. Yes, I actually read them.

25 Q. Did you conclude, after reading the

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2 regulations, that asbestos was harmful?

3 A. Being a non-medical man, I wasn't

4 capable of making that judgment.

5 Q. Did you conclude at any time, between

6 that time in about 1965 and the time of your report

7 in 1967, that asbestos was harmful?

8 A. Again, being a non-medical man, all I

9 could do was read the text and relay it.

10 Q. Let me ask you this: Have you ever been

11 provided with a copy of the deposition of Dr. Carl

12 Dernehl?

13 A. No, sir, I have not.

14 Q. As you sit here today, do you have any

15 information as to what Dr. Carl Dernehl's testimony

16 was concerning his personal knowledge regarding the

17 hazards associated with asbestos before 1967?

18 A. I have no idea at all.

19 Q. Did you ever write to Dr. Carl Dernehl

20 preparatory to your report and ask him:

21 Dr. Dernehl, what does Union Carbide's medical

22 department know about asbestos?

23 A. No, I did not, because that was the

24 purpose of the report that I wrote.

25 Q. I understand that was the purpose of

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2 your report. I'm just wondering if you asked

3 Dr. Dernehl's department, that is, the medical

4 department in New York, in the United States, prior

5 to 1967 as to what information they possessed

6 concerning the hazards of asbestos.

7 A. No, and in those days line management

8 adherence was not very important. I would not have

9 written directly to Dr. Dernehl in any case.

10 Q. Were you at liberty to request your

11 supervisor to do so?

12 A. Yes.

13 Q. Would you have been interested in

14 knowing what Dr. Carl Dernehl's views were on

15 asbestos prior to you issuing your report in '67?

16 A. Yes. But I regarded this as the

17 mechanism to unleash that information.

18 Q. Well, how did you know that the New York

19 medical department of Union Carbide in 1967 didn't

20 know everything that is in your report?

21 A. I didn't.

22 Q. Would you agree with me that you could

23 have saved yourself some substantial time in

24 research and writing by simply requesting that

25 information from New York had the New York medical

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2 department had it?

3 A. It's possible, but I liked at that time

4 to do my own research in understanding the subject.

5 Q. And did you feel that after your report

6 issued in May of 1967 that you were -- that you had

7 obtained the knowledge?

8 A. Some of the knowledge.

9 Q. And I understand that you're not a

10 medical man, but you're a bright man. And the

11 question is based on your own research did you come

12 to a conclusion after issuing that report that

13 there was a potential for asbestos to be hazardous

14 to human health.

15 A. I understood the various documents that

16 had been written, which were then collected into

17 what I sent. So yes, I understood the documents.

18 Q. Yes. And you understood the documents

19 that you had reviewed had concluded, without any

20 reasonable doubt whatsoever, that asbestos was

21 harmful to human health; true?

22 MR. WILL: Object to the form of the

23 question. He specified the conditions.

24 A. I don't think it was fully

25 established.