

Sayers

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2 Q. Were you asked to make any search for
3 any records or materials that you had?
4 A. I explained that I had some
5 documentation in my loft, in my attic, which
6 included this document (indicating). I've kept a
7 record of my previous career as it's progressed,
8 and this document was amongst that collection.
9 Q. Were you then asked -- when you say
10 "this document," that's a copy of your report of
11 May 12th, 1967?
12 A. That is correct, yes.
13 Q. Called "Asbestos as a Health Hazard in
14 the United Kingdom"?
15 A. That's right.
16 Q. Were you asked to bring that along with
17 you to the deposition today?
18 A. I brought it, yes.
19 Q. Have you kept any other documents in
20 your attic at home which have any bearing upon
21 Union Carbide's asbestos sales in England at the
22 time you worked for them?
23 A. Yes. I think there was a sales analysis
24 at one point; in other words, a listing of the
25 customers visited and success or otherwise.

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2 Q. How about any records concerning any of
3 your conversations or meetings or discussions with
4 any of these medical people that you told us about
5 earlier? Do you have any records like that?
6 A. No. Everything was destroyed, apart
7 from this particular document, long ago.
8 Q. That was destroyed by who? By you?
9 A. Yes. I did have the call reports in my
10 attic for ages, but they were so heavy I decided to
11 discard them a long while back.
12 Q. Now, at some point, then, it's my
13 understanding Mr. Will came over to England and met
14 you at the airport in Manchester, England?
15 A. Yes.
16 Q. And when was that?
17 A. I think it was May.
18 Q. May of this year, 2002?
19 A. Yes.
20 Q. What did you understand the purpose of
21 that visit was?
22 A. It was really to go through this report
23 in more detail.
24 Q. At that time you recognized and
25 understood that Mr. Will was representing Union

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- 1 Carbide in this lawsuit back in Minnesota?
2 A. Yes, I did.
3 Q. And you understood the purpose of the
4 visit is he wanted to sit down with you and go
5 through the report and review it with you and ask
6 questions about it and see what you had to say
7 about it?
8 A. As you say, yes.
9 Q. And did you do that?
10 A. Yes.
11 Q. How long did that take, to sit and go
12 through that?
13 A. Several hours. I can't be precise.
14 Q. At the time of that -- first of all,
15 were there any telephone calls between that first
16 call and the time of that visit at the airport in
17 England?
18 A. Apart from the communication as to the
19 date of the meeting, no. I think that was an
20 e-mail communication, in any case.
21 Q. Have you had -- you raise a point about
22 e-mails. Have you had any e-mail contact with
23 Mr. Will or anyone else, either representing Union
24 Carbide or from Union Carbide, in connection with
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- 1 any asbestos litigation other than Mr. Will just
2 e-mailing you as to when the meeting was?
3 A. No, none.
4 Q. And were you provided or were you shown
5 any other documentation or information at the time
6 of that meeting?
7 A. Yes.
8 Q. And what was that?
9 A. Some copy letters.
10 Q. When you say "copy letters," do you mean
11 photocopies of old letters?
12 A. Yes.
13 Q. Were those the ones that we saw here
14 earlier today?
15 A. That is so.
16 Q. And at the time of that meeting, did
17 Mr. Will say anything about what Union Carbide's
18 defenses were in the Conwed case?
19 A. I don't recall specifically, no.
20 Q. Was there any discussion as to what
21 position Union Carbide was taking in the Conwed
22 case with respect to its Calidria asbestos?
23 A. No. It was just a general appreciation
24 that there was a case.
25