

1 Q You are not a member of what is known as the
2 ACGIH, although you are familiar with that
3 organization?

4 A That is correct.

5 Q You have had no formal education or training
6 in industrial hygiene, correct?

7 A No formal education, that is correct.

8 Q Is it true that you have never testified at
9 the request of any plaintiff's lawyer about the
10 history of the knowledge of asbestos and hazards?

11 A That is correct.

12 Q That has been primarily at the request of
13 defendants?

14 A It has.

15 Q That request was made of you sometime in
16 1978?

17 A The time I was first asked to review the
18 older literature, prior to the time I got into lung
19 disease, yes.

20 Q Prior to that request -- first of all, that
21 was completely in connection with litigation; is that