1 was paid.
2 Q Who negotiated the terms of his payment?
3 A I don't know. That's before I participated in
4 the project.
5 Q So when you came on board Dr. Zhang was already
6 being paid by McLaren/Hart-ChemRisk?
7 A I believe so.
8 Q Was Dr. Zhang a medical doctor?
9 A To my knowledge, yes.
10 Q Did you ever see any proof of that?
11 A No, I did not.
12 Q So why do you say you thought he was a medical
13 doctor?
14 A That what he told me.
15 Q Was he a practicing medical doctor?
16 A I don't think so.
17 Q Do you know anything about what his background
18 and training was as a doctor?
19 A Nothing I can remember. He may have told me,
20 but I don't remember that.
21 Q Did Dr. Zhang read English?
22 A Little.
Q Did he speak English?
A Little.

Q Did you ever hear him speaking English to anyone regarding the Zhang article?
A Nothing I can recall.

Q Did you ever see him write English?
A Yes.
Q Where?
A In the material I produced for you, there are pages I remember that he wrote in -- with Chinese and English, and part of the English is, for example, locations, the city where he is at that time.

Q Would it be fair to say that he was more comfortable reading and understanding Chinese?
A Yes.
Q And so you communicated with him in Chinese; is that right?
A That's right.

Q Not in English?
A Not in English.
Q What was Dr. Zhang's position with the JinZhou Health and Antiepidemic Station?

A I remember he told me he was the person in charge, or manager of that station.

Q Did you ever gain an understanding as to what the purpose of that station was?

A My understanding is that's a government office that monitoring local epidemic --
BY MR. PRAGLIN:

Q   And the first page of the document is signed by
a Richard W. Caton, C-a-t-o-n, of McLaren/Hart, right?
A   There is a signature and in the signature is
the signature of Richard Caton, yes.
Q   Do you know that man? Do you know him?
A   Oh, Richard Caton?
Q   Yes.
A   No, I do not. No.
Q   Dr. Zhang was retired at the time that he was
involved in this matter, wasn't he?
A   That's what I recall, yes.
Q   And do you recall that he was living on $50 a
month in China?
A   I do not. I do not, because by the time I
involved, I participated in talks to Dr. Zhang,
McLaren/Hart already have some agreement with him on the
payment; so whatever he was paid before that time, what
payment he was living on, I don't recall I discuss that
with him.
Q   Did you have any discussions with Dr. Zhang
about his payment by ChemRisk?
23       A    Yes, I did.
24       Q    Would it be fair to say that he was anxious to
25           get his money from ChemRisk?