

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.

23 Q Did he speak English?

24 A Little.

25 Q Did you ever hear him speaking English to

45

1 anyone regarding the Zhang article?

2 A Nothing I can recall.

3 Q Did you ever see him write English?

4 A Yes.

5 Q Where?

6 A In the material I produced for you, there are
7 pages I remember that he wrote in -- with Chinese and
8 English, and part of the English is, for example,
9 locations, the city where he is at that time.

10 Q Would it be fair to say that he was more
11 comfortable reading and understanding Chinese?

12 A Yes.

13 Q And so you communicated with him in Chinese; is
14 that right?

15 A That's right.

16 Q Not in English?

17 A Not in English.

18 Q What was Dr. Zhang's position with the JinZhou
19 Health and Antiepidemic Station?

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

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

24 A My understanding is that's a government office
25 that monitoring local epidemic --

1 BY MR. PRAGLIN:

2 Q And the first page of the document is signed by
3 a Richard W. Caton, C-a-t-o-n, of McLaren/Hart, right?

4 A There is a signature and in the signature is
5 the signature of Richard Caton, yes.

6 Q Do you know that man? Do you know him?

7 A Oh, Richard Caton?

8 Q Yes.

9 A No, I do not. No.

10 Q Dr. Zhang was retired at the time that he was
11 involved in this matter, wasn't he?

12 A That's what I recall, yes.

13 Q And do you recall that he was living on \$50 a
14 month in China?

15 A I do not. I do not, because by the time I
16 involved, I participated in talks to Dr. Zhang,
17 McLaren/Hart already have some agreement with him on the
18 payment; so whatever he was paid before that time, what
19 payment he was living on, I don't recall I discuss that
20 with him.

21 Q Did you have any discussions with Dr. Zhang
22 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?