

1 cross-outs?

2 A I'm sure there were.

3 Q If you look at -- I think we marked it as
4 Exhibit 12, the collection of drafts, and go to the
5 draft dated November 25, 1995, beginning with Bates
6 stamped TY 102. Do you see that?

7 A I see it.

8 Q Do you see that some of the words are shaded
9 and others are crossed out in this draft?

10 A Yes.

11 Q Is that as a result of a word processing
12 program that was used at ChemRisk?

13 A Probably.

14 Q It wasn't a word processing program that was
15 used by Dr. Zhang, was it?

16 A I don't -- not to my knowledge, Dr. Zhang did
17 not have a word processing computer.

18 Q And so what does the shaded portion mean, is
19 that an addition to the document?

20 A It could represent a change, yes.

21 Q And the cross-outs represent a deletion?

22 A Correct.

23 Q And does this document, Bates stamped TY 102
24 through TY 112, reflect modifications that ChemRisk made
25 in the language of the Zhang '97 article?