

1           THE WITNESS: Well, in general, that's all related  
2 to this 19- -- year 1995, a research of chromium  
3 contamination relationship with human health. In  
4 general, that's the nature of that -- all the phone  
5 conversation.

6           And the -- they are a couple of times that this  
7 is what I reported in this two days, that there are some  
8 times of discussing other mistreated issues, but also  
9 mistreated issues related to this project.

10 BY MR. TATRO:

11           Q     From time to time in the conversations, was  
12 Dr. Zhang asked to provide information?

13           A     Oh, sure, a lot of times.

14           Q     And did he do so?

15           A     He always -- I would say he always give some  
16 insert or he make some effort, report those effort. It  
17 was not always successful for him to look for the  
18 information that ChemRisk asked for because a lot of  
19 those information were just not maintained, and I  
20 understand it's quite hard.

21                   Because in Dr. Zhang's time in China, my  
22 understanding in 1960 and 1970, Dr. Zhang never had a

23 computer. All of this information were handwriting and  
24 he's -- handwriting documents in his holding and --  
25 and -- and I -- I was quite a -- impressed by how much