

1 done in terms of getting his work published.

2 The question is argumentative.

3 THE WITNESS: Doctor --

4 MR. PRAGLIN: Let me reframe the question for you.

5 Q Was all of the work done by ChemRisk with
6 regard to the Zhang '97 paper done while ChemRisk was a
7 paid consultant to PG&E?

8 MR. McLEOD: Well, I'm going to object. The
9 question has been asked and answered.

10 He explained some work that was done after
11 June of '96 that the witness recalls not being on PG&E's
12 nickel.

13 MR. PRAGLIN: No. That's not the question.

14 I'll reask the question. The question talks
15 about while ChemRisk was a paid consultant to PG&E.

16 I'll rephrase it for you.

17 Q Was all of the work done by ChemRisk with
18 regard to the Zhang '97 paper done while ChemRisk was a
19 paid consultant to PG&E?

20 MR. McLEOD: Other than what he's already testified
21 to regarding work that was done after June of '96?

22 MR. PRAGLIN: Let's try it again.

23 Q Was all of the work done by ChemRisk in
24 submitting the Zhang article of '97 for publication done
25 while ChemRisk was a paid consultant to PG&E?

43

1 A In submitting it, yes.

2 Q And it's the follow-up or the follow-through on
3 getting the final draft to the galley proof and then in
4 final form that was done at a time after the PG&E case
5 was settled; is that right?

6 A That's correct.

7 Q Did PG&E's counsel know that ChemRisk was
8 involved in the publication of the Zhang '97 article?

9 MR. WILKINSON: Objection. Calls for speculation.

10 MR. McLEOD: Absolutely.

11 You can ask him about any contacts he might
12 have had with counsel regarding any work concerning
13 Dr. Zhang, but the question as framed calls for
14 speculation regarding counsel's knowledge.

15 MR. PRAGLIN: Let me rephrase it for you.

16 Q Did ChemRisk inform PG&E's counsel that
17 ChemRisk was involved in getting the Zhang '97 article

18 published?

19 A Yes, they knew.

20 Q It was in status reports, wasn't it?

21 A It was -- there was a specific task regarding
22 it, yes.

23 Q What was the task number?

24 A I don't remember.

25 Q It would be a matter of record in the status

44

1 report or the bill, wouldn't it?

2 A That would be my expectation.

3 Q And in fact, ChemRisk billed PG&E's counsel for
4 the work that ChemRisk was doing in getting the Zhang
5 '97 article published, didn't it?

6 A Yes.

7 Q What percentage of time spent by ChemRisk on
8 the Zhang '97 article was done while ChemRisk was a paid
9 consultant to PG&E versus the follow-through that was
10 done after roughly June of '96? And I'm only asking for
11 an estimate.

12 A Well, in terms of what we -- we got paid for,
13 100 percent of it was -- was billed of course before

14 that because we didn't get paid for any work that we did
15 to follow up after that.

16 We were following through on a commitment
17 that -- that we had made, that Tony Ye had developed the
18 relationship with Dr. Zhang, and it was our commitment
19 to him to follow through with publication process; so we
20 didn't bill or receive compensation for anything after
21 the Anderson project ended.

22 Q And I'm asking for your estimate of the
23 allocation of hours that were spent on the Zhang article
24 project while a paid consultant to PG&E versus after
25 roughly June of '96. Is it 90/10, is it 80/20, is it