- 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 O 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.

- Q What was the task number?
- 24 A I don't remember.
- 25 Q It would be a matter of record in the status