

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

517

1 document he still maintained.

2 Q Can you tell me the types of information which  
3 Dr. Zhang provided you?

4 A Oh, that's a very broad statement. I -- I can  
5 make my best effort to tell you some of them.

6 Q Please do.

7 A But I -- I -- my statement is if you take my  
8 statement as a representation of all of the documents he  
9 produced to me, I -- I don't think that's -- that would  
10 be a right interpretation of my statement I'm going to  
11 make.

12 But from time to time I remember he provided us  
13 with cancer mortality rates, either for villages or for  
14 regions or for province or for China. From time to  
15 time, we also asked -- asked him of chromium  
16 measurement. He provided some of the chromium  
17 measurement at some point of time. And also there

18 required -- request that we want more information on the  
19 chromium measurement, I think he made effort and he  
20 reported the document was lost. And also he provided  
21 information, I think, on population figures.

22           While population figures for China certainly  
23 are easy to obtain, but the population number for each  
24 of the study region, the study village, I don't think we  
25 in the U.S. are easily find those information. I think