

1 A I communicate -- I was asked to -- to --
2 whenever I communicate to Dr. Zhang, I was asked by
3 other personnels, other people in ChemRisk to ask him
4 certain point and to verify certain point with him, and
5 that's what I did. I did what I told.

6 Q But wasn't it your responsibility to make sure
7 that Dr. Zhang saw with his own eyes on paper the
8 article that was being submitted to the journals?

9 MR. CASAS: Objection.

10 MR. TATRO: Objection.

11 MR. CASAS: Asked and answered.

12 MR. TATRO: And assumes facts not in evidence, it's
13 argumentative.

14 THE WITNESS: I remember it was assigned to my -- as
15 my responsibility in each communication to tell him, to
16 describe to him what ERA -- not ERA, sorry, what
17 ChemRisk did and what change, what might be the contents
18 and wording of the article. And I remember I, per the
19 request from Bill Butler or Brent Kerger or other staff
20 in ERA -- sorry, in ChemRisk, I did what assigned to me
21 at each conversation, yes.

22 BY MR. PRAGLIN:

23 Q But nobody at ChemRisk ever told you to send a
24 copy of the final journal article to Dr. Zhang that was
25 being submitted to the journals?

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1 A I don't recall such a request, but it would
2 make sense to me in both -- in two scenarios.

3 Number one, Dr. Zhang doesn't speak English.
4 For him to -- to review an English document, it may not
5 help -- may not help him to understand that document at
6 all.

7 Second part is this English version of
8 1997 article been discussed and worked on between
9 Dr. Zhang and the ChemRisk over few months; so by the
10 time this document was sent to JOEM, all the conclusion
11 part and all the other part has been discussed in
12 multiple conversations. And my understanding is by that
13 time, Dr. Zhang was totally agreeing with ideas stated
14 in JOEM article.

15 Q But it wasn't sent in writing to Dr. Zhang in
16 its final form, was it?

17 MR. CASAS: Objection.

18 If you know.

19 **THE WITNESS:** In my 900 or so pages, I do not see

20 such a translation, I can tell you that. I don't recall

21 around that time -- around that time there are a lot of

22 communications; so I -- I don't recall exactly whether

23 there is or whether there is not such a fax. You can

24 see that I have many, many fax in my file.

25 But as I stated yesterday, I -- I -- I think

1 so.

2 Q Did you take any steps to have the Zhang
3 article reprinted in Chinese somewhere?

4 A No, I did not.

5 Q Was it ever translated into Chinese?

6 A I don't recall. It may have, but I don't
7 recall.

8 Q If it was, where is it published?

9 A It might --

10 MR. CASAS: Objection. Calls for speculation.

11 BY MR. PRAGLIN:

12 Q If the Zhang article was translated in
13 Chinese --

14 A Uh-huh.

15 Q -- where is it published?

16 MR. TATRO: Objection. Assumes facts not in
17 evidence.

18 THE WITNESS: I do not know.

19 BY MR. PRAGLIN:

20 Q The Zhang article deals with five or six
21 villages in China, right?

22 A Yes, it is.

23 Q Well, given that it deals with contaminated
24 water in those villages in China, did you ever consider
25 having the article published in Chinese journals so that