

1 Q Did Dr. Zhang write in his own hand any of
2 those versions?

3 A He -- he may have. Since I do not have a -- I
4 can show you some of his handwriting.

5 Q Let's start with the entire article.

6 Isn't it true --

7 A Okay.

8 Q -- that there is no document in Dr. Zhang's own
9 handwriting that is a Chinese version of what was
10 published as the '97 Zhang article?

11 A My --

12 MR. CASAS: If you know.

13 THE WITNESS: My material here does not have such
14 a -- just by brief looking at -- into my material when I
15 prepare it and during the lunch break, I did not find
16 such a document as you describe, but I -- I -- I don't
17 recall whether this ever exist or not. It's just not in
18 my document.

19 BY MR. PRAGLIN:

20 Q And isn't it true that there is no document
21 that Dr. Zhang typed that is a typewritten version in
22 Chinese of the English '97 Zhang article?

23 MR. CASAS: If you know.

24 THE WITNESS: Same answer as what I gave before. I
25 don't know.

158

1 BY MR. PRAGLIN:

2 Q But you can't remember one; is that right?

3 A I can -- I cannot remember one.

4 Q Now, on Exhibit 2, the Zhang article --

5 A '97 article you mean, sir?

6 Q Yes, the '97 article.

7 -- there are two authors, Dr. Zhang and Dr. Li,
8 right?

9 A Yes, there are.

10 Q But Dr. Li didn't really write any part of the
11 '97 article, did she?

12 MR. CASAS: Objection. Calls for speculation, it's
13 been asked and answered.

14 THE WITNESS: I don't know. That depends on what --
15 how much cooperation were relying of Dr. Zhang on
16 Dr. Li. That's a cooperation between them. Both are
17 in -- both were in China.

18 BY MR. PRAGLIN:

19 Q Did you make any attempt to confirm that
20 Dr. Li, in fact, wrote part of the Zhang '97 article?

21 A No, I did not.

22 Q Could I get those translations back and I'll --

23 A Sure.

24 Q -- try and put them back in order? Thank you.

25 Do you have Exhibit 2 in front of you?