

1 home address?

2 A It's --

3 MR. WILKINSON: Objection. Misstates his  
4 testimony.

5 THE WITNESS: Could be more than that. Could be  
6 some person other than Bill Butler and Tom Flahive.  
7 I -- I just mentioned those two names as examples of  
8 people work on this project in ChemRisk other than me.  
9 But I was instructed to do so.

10 BY MR. PRAGLIN:

11 Q You knew that you had sent this letter to more  
12 than one journal at the same time, didn't you?

13 A I knew I send it at two different times, one is  
14 December 5th, one is December 13th. I mean --

15 Q Well, those were --

16 A I knew I sent it on those two dates.

17 Q Did you send it to two different journals on  
18 those two dates or to the same journal on those two  
19 dates?

20 A On two different journals.

21 Q And the two would be JOEM and Archives of  
22 Environmental Health; is that right?

23           A     I believe Archives was first.

24           Q     Was there any discussion between you and anyone  
25   at ChemRisk about the fact that the article had been

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1   submitted to two different journals simultaneously?

2           MR. CASAS:  Objection.  Asked and answered.

3                   Go ahead, if you recall.

4           THE WITNESS:  I don't recall discussion.  I recall I  
5   was instructed on December 5th and December 13th to  
6   submit to the two journals you just mentioned.  And I  
7   did what I was assigned.

8   BY MR. PRAGLIN:

9           Q     So is it your testimony that you submitted the  
10   article to JOEM on December 13, 1995?

11          A     That's what I remember.

12          Q     And you think that the cover letter for that  
13   submission is in the 925 pages that you produced?

14          A     Yes.  If you give me time, I -- I may be able  
15   to find it but --

16          MR. CASAS:  That's okay.

17   BY MR. PRAGLIN:

18 Q Well, we'll look for it.

19 A Okay. Thank you.

20 Q If you look at page 495, please.

21 A 495?

22 Q Of Exhibit 1.

23 A Yes, I'm looking at it.

24 Q Is that a copy of the cover letter that you

25 submitted the Zhang article to Archives of Environmental