

1 Here is a better way to do it.

2 Q Was Dr. Saxon's name put on the Manhattan
3 Institute report?

4 A At this point I don't remember. I would have
5 to look at it.

6 Q Was Dr. Saxon paid in terms of his involvement
7 with preparing the Manhattan Institute report?

8 A No, he was not.

9 Q Okay. Why was he not?

10 A As I recall, we had a brief conversation. He
11 felt that he hadn't contributed enough to warrant being
12 paid for it.

13 Q So again, back to my question what -- what you
14 wrote or you or other people wrote and you gave it to
15 the Manhattan Institute report, and it was -- no changes
16 were made; it was just what you had written?

17 A As I said, no. It's what we wrote, but the
18 type -- they set it in different type, but the words
19 are -- to my knowledge, no words were changed.

20 Q So you wrote the line, quote, The notion that
21 toxic mold is an insidious secret killer, as so many
22 media reports and trial lawyers would claim, is junk
23 science, unsupported by actual scientific study? Those
24 were your words?

25 A They were either mine or Dr. Hardin's. I don't

1 remember which. We both worked on the transcript. I'm
2 sorry. I meant manuscript.

3 Q Do you know if Dr. Saxon has denied having any
4 involvement with the Manhattan Institute report?

5 A I don't know.

6 Q Well, okay. The ACOEM report was certainly not
7 copied verbatim in the Manhattan Institute report;
8 correct?

9 A I think you asked me that already.

10 Q So would it -- would it be accurate to say that
11 the ACOEM report was translated to create the Manhattan
12 Institute report?

13 MR. SCHEUER: Counsel --

14 THE WITNESS: I don't know what that means.

15 BY MR. BANDLOW:

16 Q How would you describe the process from getting
17 to the ACOEM report to the Manhattan Institute report?
18 What words would you use to describe to somebody how one
19 became another?

20 MR. SCHEUER: Objection. Asked and answered. Asked
21 and answered. Asked and answered.

22 Hopefully for the last time, you can answer it
23 again.

24 THE WITNESS: They are two different processes. The
25 Manhattan Institute report is -- expresses the same