Q Was he the person you were dealing with when GlobalTox was preparing the Manhattan Institute report?

A At this point I would have to go back and look. I don't remember.

Q Did you have any conversations with Mr. Howard -- well, did you have any conversations with Mr. Howard in or around 2003 about what the Manhattan Institute was?

A No, I never had a conversation about what the organization was.

Q Do you recall who initially reached out or who made the initial contact that resulted in GlobalTox being hired to prepare this Manhattan Institute report?

A I don't remember the individual.

Q Do you remember how it came about; what was the genesis of how the Manhattan Institute report came about?

A I got a call. I remember the person I was talking to said they wanted to -- they read the ACOEM position statement on mold; that it was hard to understand, and I said that it had been written for physicians. And at the time, the question was, Well could you write something -- would you be
willing to write an article that would be more assessable, for example, to judges.

Q   Did he tell you why it was he wanted this to be assessable to judges?

A   That's all he said.

Q   Did he say -- did he tell you what the Manhattan Institute was about?

A   You asked me that already.

Q   And you don't recall him telling you any of the specifics of that organization?

A   That's right.

Q   And when you had these interactions with him, did you have at that time any state of mind about what the Manhattan Institute was about?

A   No. I never heard of it before.

Q   And then eventually you entered into a contract to create the Manhattan Institute report; correct?

A   Yes.

Q   And under that contract you agreed that GlobalTox's charges would not exceed 25,000 without getting the prior approval of the Manhattan Institute report; correct?

A   I believe that's what was in the contract that we went back and found.