

1 write something, and you did, and you gave it to them.
2 Was what became the Manhattan Institute report verbatim
3 of what you gave to them, or did they make changes to it
4 after you gave it to them?

5 A They didn't make any changes. They didn't
6 change any words. Obviously the print is different.

7 Q So you -- you or people at GlobalTox -- well,
8 let me backtrack.

9 Who actually did the process of writing the
10 Manhattan Institute report?

11 A The majority was Dr. Hardin and I did, and Andy
12 Saxon did some sections.

13 Q How was it you -- well, did you witness
14 Dr. Saxon doing any portions of the Manhattan report?

15 MR. SCHEUER: See, physically see, him typing?

16 MR. BANDLOW: Uh-huh.

17 THE WITNESS: No, I didn't physically see him
18 typing.

19 BY MR. BANDLOW:

20 Q How is it you have knowledge that he wrote
21 portions of it?

22 A There were several immunology sections that we
23 sent to him as a first draft, and he answered and said
24 no, I don't think these are very good examples, or I
25 don't think you're expressing the concepts correctly.