

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

4 A At this point I would have to go back and
10 :33:08 5 look. I don't remember.

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

10 :33:20 10 A No, I never had a conversation about what
11 the organization was.

12 Q Do you recall who initially reached out or
13 who made the initial contact that resulted in
14 GlobalTox being hired to prepare this Manhattan
10 :33:40 15 Institute report?

16 A I don't remember the individual.

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

10 :33:50 20 A I got a call. I remember the person I was
21 talking to said they wanted to -- they read the
22 ACOEM position statement on mold; that it was hard
23 to understand, and I said that it had been written
24 for physicians. And at the time, the question was,
10 :34:14 25 Well could you write something -- would you be

1 willing to write an article that would be more
2 assessable, for example, to judges.

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

10 :34:38 5 A That's all he said.

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

8 A You asked me that already.

9 Q And you don't recall him telling you any
10 :34:46 10 of the specifics of that organization?

11 A That's right.

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

10 :34:54 15 A No. I never heard of it before.

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

19 A Yes.

10 :35:14 20 Q And under that contract you agreed that
21 GlobalTox's charges would not exceed 25,000 without
22 getting the prior approval of the Manhattan
23 Institute report; correct?

24 A I believe that's what was in the contract
10 :35:32 25 that we went back and found.