

Q. Okay.

In any of your brochures, "Dear Doctor" letters that were sent out, was there any mention made about the request for these prospective studies?

A. Not that I remember.

Q. Was there any mention made about the validity of the statistical studies that you had already communicated or that you had already acquired?

A. Well, I can't remember the exact wording. I don't think that we ever made the statement that these were 100 percent accurate.

Q. Yes. Well, they were far from 100 percent accurate, weren't they?

A. (No audible response.)

Q. They were far from that, weren't they?

A. I don't think we can say that. They were the best we could do.

Q. All right.

Now, you say this, Doctor. Do you recognize this statement?

This was made during the year 1962.

"We have very little data. As I have said, I have thought we might organize the meeting along some lines which may seem a little backward, but I am doing it for a reason; because almost universally when we talk to people about this possibility, the assumption is that young people in their twenties do not have thrombophlebitis and never have pulmonary embolism, and, therefore, Enovid is obviously suspect, if these conditions occur in women who are taking Enovid."

Do you recognize that statement?

A. No.

Q. Doctor, I wonder if I told you that you said that at the Cherry Hills Symposium on April 12, 1962, that that would be correct?

A. I wouldn't be at all surprised. That's exactly the way I felt.

Q. But you didn't have the data. You had very little data?

A. That's correct.

Q. So, in other words, you realized back in 1962 that your data was very little, very incomplete?

A. There was very little known by anyone in the medical profession about this particular condition at that time.

Q. Well, but back in 1962, Doctor, you were getting a tremendous amount of reports of deaths among users of Enovid of thromboembolism, weren't you?

A. Not a tremendous number, no, sir; not considering the number of people who were being—

Q. All right.

Do you remember how many deaths you had prior to 1961 from the users of Enovid before it was being used as an oral contraceptive for treatments of disease?

A. No. No, I surely don't. You are not speaking only of thromboembolism now?

Q. Pardon?

A. You are speaking of all deaths?

No, I have no way of knowing that.

Q. Do you have any recollection or knowledge, Doctor, about the number of reports of clots or deaths that were reported in users of this medication prior to its use for contraception purposes prior to 1965?

A. Yes. I have knowledge, yes. There were none that were reported to us.

Q. There were none?

A. No, sir.

Q. Wasn't there 27 incidents between 1957 and 1961?

A. Of thromboembolism?

Q. Yes.

A. Not to my knowledge.

(Pause in the proceedings.)

By Mr. MAY. (Continuing) :

Q. I'm reading, Doctor, from this thick document, Defendant's Exhibit P, and I apologize for having you wait. I guess I didn't do my home work, as far as the pages went, as much as I thought I did.

You are familiar with this exhibit that formed part of your knowledge back in '62?

A. Right.

Q. And under Section 2 you have a summary of cases which were reported up to the date of this document?

A. I don't remember exactly everything that's in every page of that book, but I will accept that, yes.