

COMMONWEALTH OF  
MASSACHUSETTS,  
MIDDLESEX, ss.

SUPERIOR COURT DEPARTMENT  
CIVIL ACTION NO. 93-2219

S. FRED SINGER, Ph.D.,

Plaintiff,

v.

JUSTIN LANCASTER, Ph.D.,

Defendant.

AFFIDAVIT

of

MS. CHRISTA BERAN

1. My name is Christa Beran. I have been a resident of 6339 Dennison Street, San Diego, California, 92122, since about 1977.

2. I first worked for Roger Revelle around 1976, when he came back from Harvard University and started spending half the year at the University of California at San Diego and half at Harvard. I was Roger's part-time secretary until about 1979, when I transferred to the Literature Department during one of Roger's visits back to Harvard. When Ms. Alice Neale retired from her job as Roger's full-time secretary in 1985, I began working once again for Roger. I remained Roger's secretary from then until his death in July 1991.

3. I am sure that Roger and I together never worked on the article titled, "Look Before you Leap," published in the *Cosmos Club Journal* and showing Singer, Revelle and Starr as co-authors. I know this was not one of Roger's priorities. I have been shown recently (July 1993) the copy of the galley proof for this article that was provided to Justin Lancaster by Dr. Fred Singer, and, as I look at the galley proof, it doesn't look familiar to me. I don't remember ever working on it with Roger. In fact, I was not even aware that this article was published before he died.

4. In the period 1990-91, Roger was working on two biographies for the National Academy of Sciences (NAS), completing the sea level rise volume for the National Research Council, trying to get Dr. Peter Rogers membership in the NAS, and trying to get Dr. Hans Suess a particular medal. He was planning to write an historical

paper on carbon dioxide research. I remember we spent many weekends going over Roger's "lantern" slides that he had gathered for a talk on Oceanography and Technology at Woods Hole. As visual aids he had a variety of devices or pieces of devices, such as a piece of instrument wire invented by Jeff Frautschy and a valve from a SCUBA apparatus from the Scripps diving instructor.

5. On Roger's return from the February 1990 meeting of the American Association for the Advancement of Science (AAAS) in New Orleans, Roger was taken straight from the airport to the hospital. His doctors and family determined that he needed heart surgery. I think they did the surgery right then, without his coming back to the office.

6. During this period of late February and March 1990, I went to the hospital quite frequently to visit. Occasionally I would take something from the office in case he felt like working, but his family quite understandably were anxious not to have him exert himself. He was dreadfully weak. One day when I went to visit, it looked as though Roger was sleeping. So I sat down by the bed to wait until he woke up. Pretty soon he opened his eyes and said "I've been trying to remember the name of the third opera in which Mozart collaborated with Da Ponte." He had recalled *Don Giovanni* and *The Marriage of Figaro*. I was able to fill in *Così fan Tutte*. I am sure we did not work on Dr. Singer's article in the hospital. We would have worked only on really urgent materials.

7. When Roger first came home from the hospital with his nurse Janet, in March 1990, he was recuperating fairly well from the heart surgery. Then one night he was suddenly readmitted for an emergency hernia operation, and while in the hospital this second time he got a bad staph infection. This was around early April 1990. He was very weak from this, and the six-week course of strong antibiotics almost killed him. This really set him back.

8. When Roger was finally back home again in May 1990 and strong enough to start taking care of business, my main concern was to fill in some blanks on an oral history, based on interviews with Roger conducted by Ms. Sarah Sharp. We were probably working mostly on this. I am sure we did not work on Dr. Singer's article in this period either, during the spring of 1990.

9. In late summer 1990, Roger started coming into the office for short periods of time and often he would spend much of this time dozing. I think that physically he couldn't keep up with his mind. Sometimes he would fall asleep while he was dictating; this happened more frequently early in his recovery than later. I remember that even as late as November 1990 we had to make special arrangements to get him from the room where he was to receive the National Medal of Science to the room where the luncheon was to be held because he was too weak to walk very far. Roger gradually grew stronger. Just before he died, during May and June of 1991, he seemed a lot stronger. He could come in then and spend a full day working in the office without even taking a nap.

10. I do not remember seeing any review by Roger of any text by Dr. Singer before a day in February 1991 when he came to Roger's office. For quite some time Dr. Singer had been trying to get Roger to work on an article that Dr. Singer was writing for the *Cosmos Club Journal*. He seemed quite anxious to get Roger's comments. Roger would take letters or other materials received from Dr. Singer and put them underneath piles of paper on his desk. When Dr. Singer would call, I would get the letter or draft paper out from under the stack and put it on Roger's desk, and then Roger would proceed to cover it up with other documents until it ended up back under the stack. After a series of unsuccessful attempts to get Roger to work on this document, Dr. Singer must have decided that the only way he was going to get this thing done was to come in person.

11. Dr. Singer arrived unannounced one day in February 1991. I was unprepared for his visit, thinking that Roger had other plans for that afternoon. I remember that Dr. Singer was here for some other function at Scripps that he may have broken away from to talk to Roger. Dr. Singer was sitting with his back to me. I remember feeling that Roger was cornered, because I thought I understood from the fact that Roger had procrastinated so long that this enterprise was something he didn't really want to be involved with. I somehow got the impression during 1990-91 that Dr. Singer was not very popular, and I asked Roger why this was. Roger said, "Some people don't think Fred Singer is a very good scientist."

12. In 1992, about a year after Roger's death, I was traveling in Cornwall, England, when I learned that Ellen Revelle had tried to call me. I returned her call from Cornwall sometime between 29 June and 4 July 1992. Ellen was surprised to hear from me. She asked if I would be willing to talk to Walter Munk and I said of course I would, and she gave me a little idea about what was going on about the *Cosmos* article.

13. Walter Munk then called me in Cornwall during this period of early July 1992. Walter told me during our telephone conversation that he was concerned about how the *Cosmos* article was being used, and that he believed the article misrepresented Roger's thoughts about the issues. I told Walter that Roger had been very reluctant to be involved in this enterprise. Roger had his ways of postponing things until the issue became irrelevant, and I thought that was what Roger was doing here. When Dr. Singer would call I sort of knew what Roger's response would be, and we kept putting it off, saying, "Roger has so many other things to do, etc." I returned to San Diego from my trip overseas on 23 July 1992.

14. I remember talking to Justin Lancaster by telephone in 1992, although I am not exactly sure of the date. I told Justin about my illness and treatment for breast cancer, and my hair starting to grow back. Justin didn't know about my medical condition before then. I think that Justin and I talked about the same issue that Walter and I had discussed when I was in Cornwall, and that Justin was calling to confirm what Walter had told him about my conversation with Walter.

Under penalty of perjury, I certify that the above statements are true to the best of my knowledge. Sworn, signed and sealed by me on this 2nd day of August, 1993, in the City of La Jolla, County of San Diego, State of California.

Christa Beran  
Christa Beran  
6339 Dennison Road, San Diego, CA 92122

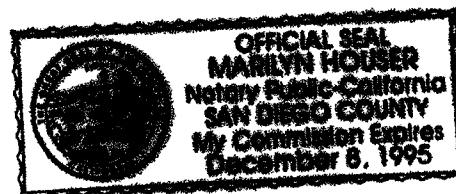
**CERTIFICATION**

On August 2nd, 1993, the above-named Christa Beran did personally appear before me and swear, under penalty of perjury, that the statements made in the above Affidavit are true to the best of her knowledge, and are freely subscribed by her.

Marilyn Houser  
NOTARY PUBLIC

My commission expires: 12/8/95

STATE OF CALIFORNIA, COUNTY OF SAN DIEGO  
SUBSCRIBED AND SWORN TO BEFORE ME  
THIS 2nd DAY OF August 19 93  
Marilyn Houser  
NOTARY PUBLIC



C. Beran Affidavit