

Edgar Allen Peterson, IV

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA

EDGAR ALLEN PETERSON, IV,
PLAINTIFF,

V.

NO. 7:23-CV-01576-M

UNITED STATES OF AMERICA,

DEFENDANTS.

VIDEO DEPOSITION OF EDGAR ALLEN PETERSON, IV

Taken at the instance of the Defendant on Thursday,
February 8, 2024, in the home of Edgar Allen Peterson,
IV, 1509 Goodbar Avenue, Memphis, Tennessee,
beginning at 9:13 a.m.

(Appearances noted herein)

REPORTED BY: Kelly D. Brentz, CSR, RPR

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APPEARANCES:

JOHN F. ROMANO, ESQ.
MARJORIE H. LEVINE, ESQ.
Romano Law Group
john@romanolawgroup.com
majorie@romanolawgroup.com
J. EDWARD BELL, III, ESQ.
Bell Legal Group
jeb@belllegalgroup.com
SARA PAPANTONIO, ESQ. (VIA ZOOM)
Levin Papantonio Rafferty
spapantonio@levinlaw.com

COUNSEL FOR PLAINTIFF

ELIZABETH K. PLATT, ESQ.
JOSEPH TURNER, ESQ.
ANNA ELLISON, ESQ. (VIA ZOOM)
ADAM RAVIV, ESQ. (VIA ZOOM)
U.S. Department of Justice
elizabeth.k.platt@usdoj.gov
joseph.b.turner@usdoj.gov

COUNSEL FOR DEFENDANT

ALSO: Michael Mitchell, videographer, VCE Legal Tech
Patti Mobley
Lori Peterson

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9 1 Notice of Deposition..... 7

10 2 Plaintiff Edgar Peterson's Answers to

11 Defendant United States' First Set of

12 Interrogatories..... 9

13 3 Document Titled: ATSDR Public Health

14 Assessment - Final Version, Marine Corps

15 Base Camp Lejeune, NC Drinking Water;

16 Figure 1, The Hadnot Point-Holcomb Boulevard

17 Water Distribution Areas, U.S. Marine Corps

18 Base Camp Lejeune, North Carolina, with

19 handwritten notations..... 21

17 REPORTER'S NOTES;

18 NOTE 1: Instructions for the use of "Unintelligible" by
the court reporter are noted on page 4.

19 NOTE 2: Answers using the speech software and device by
20 the witness are written phonetically as voiced by the
21 device; i.e., typos and other errors render some responses
22 confusing and/or grammatically incorrect.

23 NOTE 3: Per discussion with counsel, beginning on page
24 26, several uninterrupted answers given by the witness
25 were not reportable; counsel have agreed to obtain any
such answers subsequent to completion of this deposition.

1 (Per Counsel instructions, due to known speech
2 difficulties of the witness, the court reporter is to
3 use the word "Unintelligible" where necessary.
4 Counsel shall be responsible for any clarification.)

5 THE VIDEOGRAPHER: Okay. We are now on the
6 record. My name is Michael Mitchell. I'm the
7 videographer for Golkow Litigation Services.

8 Today's date is February 8, 2024. The time is
9 9:13 a.m. The video deposition is being held in
10 Memphis, Tennessee, in the matter of Edgar Allen
11 Peterson, IV vs. United States of America. The
12 deponent is Edgar Allen Peterson, IV.

13 And will all counsel please introduce
14 yourselves?

15 MR. ROMANO: John Romano on behalf of Eddie
16 Peterson.

17 MR. BELL: Ed Bell on behalf of Mr. Peterson.

18 MS. LEVINE: Marjorie Levine on behalf of
19 Eddie Peterson.

20 MS. PLATT: Elizabeth Platt on behalf of the
21 United States.

22 MR. TURNER: Joseph Turner on behalf of the
23 United States.

24 THE VIDEOGRAPHER: Will the -- will the counsel
25 on the Zoom please introduce yourselves?

1 MS. PAPANTONIO: Sara Papantonio on behalf of
2 Mr. Peterson.

3 MR. RAVIV: Adam Raviv -- go ahead.

4 MS. ELLISON: Anna Ellison on behalf of the
5 United States.

6 MR. RAVIV: Adam Raviv on behalf of the United
7 States.

8 THE VIDEOGRAPHER: And will the court reporter
9 please swear the witness?

10 (The witness was duly sworn.)

11 THE VIDEOGRAPHER: One more thing, I'm sorry,
12 the court reporter is Kelly Brentz.

13 EDGAR ALLEN PETERSON, IV,
14 having first been duly sworn, was examined and
15 testified as follows, to-wit:

16 EXAMINATION BY MS. PLATT:

17 Q. Mr. Peterson, let me introduce myself one more
18 time. My name is Elizabeth Platt. I'm on behalf of the
19 United States. Thank you so much for taking the time to
20 speak with us today.

21 I first want to start by thanking you for your
22 service to this country on behalf of the Department of
23 Justice and myself. Thank you.

24 Have you ever been deposed before?

25 A. No, no.

1 Q. "No"? Well, let me go through some broad
2 instructions before we get started. I'm going to ask you
3 some questions and I would like you to answer them to the
4 best of your ability. If you don't understand a question,
5 please ask me to rephrase. I'm happy to rephrase the
6 question for you. If you answer the question, I'm going
7 to assume that you understood the question as it was
8 phrased.

9 In a normal conversation, you typically can
10 start speaking in the middle of a question, but for
11 deposition purposes and for purposes of the court
12 reporter, please wait until I finish my questioning and
13 then you can answer that question.

14 Also, when you are answering the question,
15 please say "yes" or "no" fully, and if you're speaking
16 through your software, then feel free to use Y for "yes"
17 or N for "no" to make it easier on yourself.

18 If you need to take a break at any time, just
19 let me know, we're happy to take breaks. But if there's a
20 question pending, I ask that you answer that question and
21 then we can take a break.

22 And I also want to put on the record that
23 Mr. Peterson is using a text-to-speech software called --
24 app entitled NaturalReader and that is being used as his
25 form of communication, and he is also going to verbally

1 communicate some instances.

2 When the court reporter cannot understand that
3 verbal -- that verbal communication, she can stop and ask
4 you to repeat the question so that we get it on the
5 record. Do you understand?

6 A. Yes.

7 Q. Thank you. Mr. Peterson, can you state your
8 name for the record?

9 A. Edgar Allen Peterson, IV.

10 Q. And do you currently live at 1509 Goodbar
11 Avenue, Memphis, Tennessee 38104?

12 A. Yes.

13 MS. PLATT: I would like to mark this as Exhibit
14 No 1.

15 (Exhibit 1 marked for identification and
16 attached hereto.)

17 MS. PLATT: I'm handing Exhibit No. 1 to the
18 witness and opposing counsel. I should also add that
19 this deposition is pursuant to the Federal Rules of
20 Civil Procedure 30, 34, and it's also governed by the
21 stipulated deposition protocol entered in In Re: Camp
22 Lejeune Water Litigation by this Court.

23 Q. (By Ms. Platt) Mr. Peterson, I just handed you
24 Exhibit No. 1 which is the deposition notice for this
25 deposition. Do you recognize this document?

1 A. Yes.

2 Q. And you have seen it before?

3 A. Yes.

4 Q. And are you willing to produce the items listed
5 in this deposition notice --

6 A. Yes.

7 Q. -- to the extent that they are not already
8 produced?

9 A. Yes.

10 Q. Okay. You can set that aside.

11 A. Okay.

12 Q. Mr. Peterson, how old are you?

13 A. (Unintelligible.)

14 THE REPORTER: Seventy-five?

15 THE WITNESS: Yeah.

16 MR. ROMANO: Seventy-five?

17 MS. PLATT: Just in conjunction with the
18 deposition protocol, I will ask Mr. Romano to --

19 MR. ROMANO: You're exactly right.

20 MS. PLATT: Okay.

21 Q. (By Ms. Platt) And, Mr. Peterson, how many
22 children do you have?

23 A. (Unintelligible.)

24 Q. And what are their names?

25 THE REPORTER: Wait, I'm sorry?

1 THE WITNESS: Two.

2 THE REPORTER: "Two"? Okay.

3 THE WITNESS: (Unintelligible.)

4 THE REPORTER: Okay. I'm -- I'm sorry.

5 (Pause.)

6 A. (Using speech software) "Galey Brooks Grimes,
7 Grace Claire Peterson."

8 MS. PLATT: And I'm going to mark this as
9 Exhibit 2.

10 (Exhibit 2 marked for identification and
11 attached hereto.)

12 Q. (By Ms. Platt) Mr. Peterson, I'm handing you
13 Government's Exhibit No. 2. This is a copy of the
14 interrogatories that you served on the United States dated
15 January 25th. Do you recognize this document?

16 A. Yes.

17 Q. And while you're looking through that,
18 Mr. Peterson, at the very -- second to last page, there is
19 a signature page for you to sign, and your counsel
20 represented that you would sign this after you have
21 reviewed it at this deposition. So please feel free, take
22 your time and review this, and then sign it if you believe
23 that it is accurate to the best of your knowledge,
24 information and belief.

25 (Pause.)

1 MR. ROMANO: Okay. Just let the record reflect
2 that Mr. Peterson has signed these interrogatories.

3 MS. PLATT: I believe Ed's signature also needs
4 to be on there, but if you would like to cross it out
5 and put yours, it doesn't matter which attorney signs
6 it.

7 (Pause.)

8 Q. (By Ms. Platt) Thank you, Mr. Peterson. I want
9 to talk a little bit about your parents. Was your
10 father's name James Brooks Peterson, Sr.?

11 A. Yes.

12 Q. And was his cause of death a stroke?

13 A. Yes.

14 Q. Did he also have high blood pressure?

15 A. (Unintelligible.)

16 Q. Okay.

17 THE REPORTER: Sorry?

18 THE WITNESS: I don't know.

19 Q. (By Ms. Platt) Do you know if he had prostate
20 cancer?

21 A. What?

22 Q. Do you know if he had prostate cancer?

23 A. Yes.

24 Q. And his date of death is in 2010?

25 A. Yes.

1 Q. And your mother's name was Maridecine Clark
2 Peterson?

3 A. Yes.

4 Q. And her date of death was 2012?

5 A. Yes.

6 Q. And her cause of death was dehydration?

7 A. Yes.

8 Q. Did your mother also have leukemia?

9 A. No.

10 Q. "No"?

11 THE REPORTER: "No"?

12 THE WITNESS: No.

13 Q. (By Ms. Platt) Did your mother have breast
14 cancer?

15 A. What?

16 Q. Breast cancer?

17 A. Yes.

18 Q. Did your mother have high blood pressure?

19 A. Yes.

20 Q. And did your mother suffer strokes?

21 A. No.

22 Q. Mr. Peterson, have you ever suffered a stroke?

23 A. No.

24 Q. Okay. Mr. Peterson, I want to talk a little bit
25 about your time in the military. What branch of the

1 military did you serve in?

2 A. Marine Corps. Marine Corps.

3 Q. And did you start your service in 1975?

4 A. No.

5 Q. What year did you start your service?

6 A. (Unintelligible.)

7 THE REPORTER: 1974?

8 THE WITNESS: '4.

9 THE REPORTER: '4?

10 MR. ROMANO: Eddie, '74?

11 THE WITNESS: Yes.

12 MR. ROMANO: Can we -- I'm not sure how to do
13 this, but if we can agree that we can basically
14 assist to clarify like I just did, would that be okay
15 with everybody?

16 MS. PLATT: To the extent that you just did that
17 is fine. If it goes beyond that, I would --

18 MR. ROMANO: We're not going to suggest answers
19 to him, but if it's like a date or something, once he
20 says it, just to make sure we're getting the right
21 thing down in the record.

22 MS. PLATT: And to the extent that I am asking
23 "yes" or "no" questions, I am trying to.

24 Q. (By Ms. Platt) Mr. Peterson, you were a JAG
25 officer in the military; correct?

1 A. Yes.

2 Q. Could you use your text-to-speech software and
3 tell us what your daily activities included?

4 A. (Using speech software) "At which duty
5 station?"

6 Q. Camp Lejeune.

7 A. (Using speech software) "When I arrived at
8 Lejeune in May of '75, I was assigned to the defense
9 section. Among my duties were the def dense of marinex at
10 general courts martel, special corps martial's,
11 administrative discharge boards, article cue, summary coo
12 its, martial administrative discharge boards and vi ests
13 to the brig."

14 THE REPORTER: I think it's reading some things
15 funny, but I'll try to roll with it.

16 MR. ROMANO: Do you need to have him redo so you
17 can --

18 THE REPORTER: No, no, I'd rather just see it,
19 but I don't know how -- is that visible later or does
20 it disappear?

21 (Pause.)

22 THE REPORTER: Is there any way to get a copy of
23 this later? Does it stay in the software? You know
24 what, let's just go. Let's just go ahead. I'll just
25 do my best.

1 MR. ROMANO: Let's go off the record.

2 THE VIDEOGRAPHER: Off the record at 9:39.

3 (A discussion was held off the record.)

4 THE VIDEOGRAPHER: Back on the record at 9:40.

5 A. (Using speech software) "Is keep -- if I could
6 suggest, some of my answers are long, I see will break
7 t-h-m-u-g. If that would be e-d-s. East key to v-o-d."

8 THE REPORTER: Can I read it?

9 THE WITNESS: (Complied.)

10 THE REPORTER: Yeah, (Reading from device), "If
11 I could suggest, some of my answers are long, I could
12 break them up if that would be easier."

13 That's good. That would be good. That was it.
14 I think it was like long and the voice is misreading
15 some things so -- okay. Maybe we can start back.

16 MS. PLATT: Yes.

17 Q. (By Ms. Platt) Okay. So, Mr. Peterson, prior
18 to going to Camp Lejeune in 1975, you were at other bases;
19 correct?

20 A. Yes.

21 Q. You were at Quantico; correct?

22 A. Yes.

23 Q. The naval base in Newport, Rhode Island?

24 A. Yes.

25 Q. And then you went to Camp Lejeune?

1 A. Yes.

2 Q. And that was in -- by -- that was in May of
3 1975; correct?

4 A. Yes.

5 Q. And then you went to Paris Island, South
6 Carolina?

7 A. No.

8 Q. "No"?

9 A. (Using speech software) "I didn't go there as
10 UM, I think, as I wasn't assigned there, I went down to P
11 of a two-day inspection the troops."

12 Q. Thank you. Did you go to Cherry Point, North
13 Carolina?

14 A. Yes.

15 Q. Did you also go to the Air Force base in
16 Charleston, South Carolina?

17 A. Yes.

18 Q. And the naval base in Millington, Tennessee, did
19 you go there?

20 A. Yes.

21 Q. What was the last day that you were at Camp
22 Lejeune?

23 A. (Using speech software) "Some time in April of
24 1977."

25 Q. While at Camp Lejeune, did you do any training

1 in the field?

2 A. (Using speech software) "I qualified at the
3 rifle range once a year, and on one occasion, I spent an
4 afternoon on an inspection of tril lops."

5 Q. Did you ever drink out of a water buffalo?

6 A. Yes, yes.

7 Q. In what situation were you drinking out of the
8 water buffalo?

9 A. (Unintelligible.)

10 THE REPORTER: You were thirsty?

11 THE WITNESS: (Nodded.)

12 Q. (By Ms. Platt) How frequently did you drink out
13 of water buffalos?

14 A. (Unintelligible.)

15 THE REPORTER: When you got thirsty?

16 THE WITNESS: (Nodded.)

17 Q. (By Ms. Platt) Would that be more than two
18 times a day?

19 A. (Unintelligible.)

20 THE REPORTER: I don't --

21 MR. ROMANO: Eddie, go to the device for that
22 one.

23 A. (Using speech software) "Probably."

24 Q. (By Ms. Platt) Did you drink out of a water
25 buffalo more than ten times a day?

1 A. (Using speech software) "Probable."

2 Q. And as a JAG officer, did you work out of an
3 office?

4 A. Yes.

5 Q. How many hours a day did you spend in that
6 office?

7 A. (Unintelligible.)

8 THE REPORTER: Eight?

9 THE WITNESS: (Unintelligible.)

10 MS. PLATT: Eight to ten?

11 THE WITNESS: Yeah.

12 THE REPORTER: Okay.

13 Q. (By Ms. Platt) For the remainder hours of the
14 day, where did you spend your time?

15 A. (Using speech software) "Probable. Depends
16 what day it was."

17 Q. Can you give us an example of what you would do
18 on a normal weekday?

19 A. (Using speech software) "Go to work and
20 accomplish whatever mission was assigned to."

21 THE WITNESS: (Unintelligible.)

22 THE REPORTER: "Assigned"?

23 THE WITNESS: (Nodded.)

24 THE REPORTER: Got you.

25 Q. (By Ms. Platt) After you left the office in the

1 evening, what is a typical activity that you would do?

2 A. (Unintelligible.)

3 MR. ROMANO: Pull-ups?

4 Q. (By Ms. Platt) So you would run and do
5 pull-ups; is that correct?

6 A. (Gesturing) (unintelligible.)

7 Q. Sit-ups?

8 A. Yes. (Using speech software) "As hard as this
9 is for you to understand me, you must realize that I am L
10 like this every day becamps of the water at Lejeune. I
11 didn't ask to be like be this and but for the actions and
12 inactions of our government, me have of lost so very
13 much."

14 Q. So other than working out, is there anything
15 else you typically did in the weekday evenings?

16 A. (Using speech software) "Yes."

17 Q. Can you provide us with examples of what that
18 activity was?

19 A. (Using speech software) "Eat dinner, take a
20 shower after working out, plan for a nope chully promising
21 fucture."

22 Q. I'm not sure I understand the last part of that.

23 MS. PLATT: Do you understand that, Mr. Romano?

24 MR. ROMANO: No. Eddie, can you clarify that
25 last sentence, please?

1 THE REPORTER: Plan for a hopefully promising
2 future?

3 Q. (By Ms. Platt) Is that correct?

4 A. (Using speech software) "Eat dinner, take a
5 shower after working out, plan for a nope chully promising
6 future."

7 Q. Mr. Peterson, how many drinks did you have with
8 dinner?

9 A. (Using speech software) "I am a water drinker,
10 a DG, would probably have three to four C ups of water. I
11 might drink one glass of sweered ice tea as required of
12 all boys. I don't drink coffee."

13 Q. Did you drink water with breakfast?

14 A. (Using speech software) "What day of the week
15 are you referring to?"

16 Q. Any day of the week. Was there -- if there's a
17 difference between your Sunday drinking in the morning and
18 your Monday drinking in the morning, you can provide us
19 with both.

20 A. (Using speech software) "My life was not like
21 groundhog day. You must remember that I am being ask ded
22 about my actions 50 years ago that I challenge you to tell
23 me what you had for dinger on January 14, 2024. My life
24 was not like groundhog day."

25 Q. Would you estimate that you drank one glass of

1 water with breakfast?

2 A. (Unintelligible.)

3 THE REPORTER: "I don't know"?

4 THE WITNESS: (Nodded.)

5 Q. (By Ms. Platt) Would you say the same for
6 lunch? Do you not remember how much you drank for lunch?

7 A. (Using speech software) "I see a."

8 (Pause.)

9 A. (Using speech software) "I cannot recall, what
10 I can say is about my ingestion of water on my stecks and
11 status with Lori gaily, we've went tuft inner and sapped
12 in by L boss should later."

13 Q. I'm not sure I understood that, Mr. Peterson.

14 A. What?

15 Q. What your phone just read. Were there typos or
16 something in there? I don't think it made sense to me.

17 MS. PLATT: Mr. Romano, did it make sense to
18 you?

19 MR. ROMANO: I did not understand it, Eddie. If
20 you could, just clarify the last statement.

21 (Pause.)

22 MR. ROMANO: Is it okay if we take a break? I
23 just think -- he's having to work for this and I
24 think if we just give him a little rest, that may
25 help.

1 MS. PLATT: Of course.

2 (Pause.)

3 A. (Using speech software) "In my previous
4 comment, I was referring to my second date with Lori and
5 her later comment that she was amazed at the amount of
6 water I drank at dinner."

7 Q. (By Ms. Platt) Thank you.

8 MS. PLATT: I think we're going to go ahead and
9 take a break now. We can go off the record for about
10 ten minutes.

11 THE VIDEOGRAPHER: Off the record at 10:32.

12 (Recess.)

13 THE VIDEOGRAPHER: Okay. We are back on the
14 record at 10:48.

15 MS. PLATT: I would like to mark this as Exhibit
16 No. 3.

17 (Exhibit 3 marked for identification and
18 attached hereto.)

19 Q. (By Ms. Platt) Mr. Peterson, I'm handing you
20 what's been marked as Exhibit No. 3.

21 Mr. Peterson, this is a partial map of Camp
22 Lejeune taken from an ATSDR public document, a public
23 health assessment of drinking water. Do you recognize
24 this map?

25 A. Yes.

1 Q. Would you be able to identify on this map where
2 you lived? And if you lived in multiple locations, could
3 you identify both locations?

4 A. (Unintelligible.)

5 Q. "Maybe"?

6 A. (Nodded.)

7 Q. Could you take a pen and mark those locations on
8 the map where you lived?

9 A. (Unintelligible.)

10 THE REPORTER: I can't -- I'm sorry.

11 A. (Using speech software) "As close as I can
12 get."

13 Q. (By Ms. Platt) That's fine.

14 (Pause.)

15 A. (Complied.)

16 Q. Mr. Peterson, can you identify on this map and
17 mark on this map where you worked on base?

18 (Pause.)

19 A. (Complied.)

20 Q. Thank you. Can I have that pen back?

21 A. (Complied.)

22 Q. Thank you.

23 MR. ROMANO: Can I see that?

24 MS. PLATT: Uh-huh.

25 Q. (By Ms. Platt) Mr. Peterson, how did you get

1 from the place you lived to where you worked? Did you
2 walk?

3 A. (Unintelligible.)

4 Q. You drove?

5 A. Yes.

6 Q. "Yes"?

7 A. Yes.

8 Q. Did you have a car on base, Mr. Peterson?

9 A. Yes.

10 Q. And, Mr. Peterson, did you live in barracks?

11 A. No.

12 Q. What type of housing structure did you live in?

13 A. (Using speech software) "I resided in two
14 locations on base, one was MOQ 3334, one was a small room
15 in a BOQ near the O club."

16 (Pause.)

17 A. (Using speech software) "MOQ was M-O-Q, married
18 officers quarters, and BOQ was B-O-Q, bachelor officers
19 quarters. Both were in the parrot est point area."

20 Q. And did you have a kitchen that you cooked your
21 meals in or did you eat in a mess hall?

22 A. (Using speech software) "The MOQ was an f-r-e
23 standing house with all the features of a house. During
24 the week, I would eat there, at the O club, at the bowling
25 alley, at the brig, I rarely ate off base. The BOQ did

1 not have kitchen facilities I be the room and I can't
2 recall if there was a common kitch et available for all
3 the officers residing there."

4 Q. And, Mr. Peterson, who would be the individuals
5 most likely to know information about your time on base
6 that are still living?

7 (Pause.)

8 THE WITNESS: (Unintelligible.)

9 MR. ROMANO: You need Lori?

10 THE WITNESS: Yes.

11 MR. ROMANO: Lori --

12 MS. PLATT: Can we go off the record?

13 THE VIDEOGRAPHER: Off the record at 11:06.

14 (Recess.)

15 THE VIDEOGRAPHER: We are back on the record at
16 11:44.

17 MS. PLATT: While we're on the record, I'm going
18 to go back to Exhibit No. 3, which is the map of Camp
19 Lejeune. Mr. Peterson marked two locations on the
20 left-hand side of the map as places he lived, and I'm
21 marking the first with a No. 1 and the second with a
22 No. 2 in circles.

23 Mr. Peterson also marked on the right-hand side
24 of the map two locations where he worked, and I will
25 mark the first location with the No. 3 and the second

1 location with the No. 4 in circles. Just so you know
2 what I did, Mr. Romano.

3 MR. ROMANO: Understood.

4 Q. (By Ms. Platt) Mr. Peterson, you were diagnosed
5 with Parkinson's in 2001; is that correct?

6 A. Yes.

7 Q. Do you remember the name of the doctor who
8 diagnosed you?

9 A. (Unintelligible.)

10 Q. Is it Tulio Bertorini?

11 A. Yes.

12 Q. Yes.

13 MS. PLATT: Here's the spelling of that for you.

14 THE REPORTER: I may just take a picture of it.

15 MS. PLATT: It's also an exhibit.

16 THE REPORTER: Oh, never mind.

17 Q. (By Ms. Platt) Mr. Peterson, when you were
18 diagnosed with Parkinson's in 2001, you were working as an
19 attorney; is that correct?

20 A. Yes.

21 Q. And you were working at a law firm at that time?

22 A. Yes.

23 Q. And I believe I have the name of that law firm.

24 One second.

25 A. (Unintelligible.)

1 Q. The Hardison Law Firm?

2 A. Yes.

3 Q. And your position was associate attorney;
4 correct?

5 A. Yes.

6 Q. And prior to joining the Hardison Law Firm, you
7 were a district attorney; is that correct?

8 A. (Unintelligible.)

9 THE REPORTER: I'm sorry?

10 A. (Unintelligible.)

11 THE REPORTER: I'm not --

12 A. (Unintelligible.)

13 (Whereupon, the witness responded with a lengthy
14 uninterrupted answer which was largely unintelligible
15 and unreportable. Per discussion, counsel will make
16 provisions subsequent to the deposition for acquiring
17 the answer.)

18 THE REPORTER: Can I interject? I didn't want
19 to interrupt that and no one else did either so I
20 will just have "unintelligible" where I couldn't get
21 things unless y'all want to go back and redo that.

22 MR. ROMANO: One suggestion would be that, at
23 the conclusion of the deposition, we could ask
24 Mr. Peterson to review the video and audio and
25 translate what he just said.

1 MS. PLATT: How about we leave that as in -- as
2 something that you did not catch but we issue an
3 interrogatory for that question and then he can write
4 it in an interrogatory, what he had said, just so
5 that we keep the transcript as it was written.

6 THE REPORTER: Yeah.

7 MR. ROMANO: We can do that. I think we need to
8 do it both ways.

9 MS. PLATT: I would just like to keep the
10 transcript --

11 THE REPORTER: Yeah, I'm not -- that's what I'm
12 getting right now. If y'all want to do something
13 afterwards or do it on the correction page, whatever,
14 I'm just letting y'all know so that I'm expressing
15 myself. I'm -- as we discussed earlier, I'm putting
16 "unintelligible" as we discussed earlier about how to
17 do that. I just didn't want to interrupt, as we also
18 discussed.

19 MS. PLATT: Correct. Thank you.

20 MR. ROMANO: The other thing is, just so you
21 know, we will speak with you-all after the depo and
22 we will work out whatever we need to do to have this
23 all work out and make sense for everybody.

24 MS. PLATT: Okay.

25 MS. LEVINE: And if you want to save some of the

1 questions that you know are going to have longer
2 answers for interrogatories, we will get those to
3 you, too.

4 THE REPORTER: What's happening? Are we off?
5 Somebody left?

6 MR. ROMANO: We're on the record. Yes, Mr. Bell
7 left.

8 THE REPORTER: Okay.

9 (Attorney Ed Bell has exited the deposition
10 room.)

11 Q. (By Ms. Platt) And, Mr. Peterson, when you were
12 working as an assistant DA, you worked on homicide cases;
13 is that correct?

14 A. Yes (unintelligible.)

15 (Whereupon, the witness responded with a lengthy
16 uninterrupted answer which was largely unintelligible
17 and unreportable. Per discussion, counsel will make
18 provisions subsequent to the deposition for acquiring
19 the answer.)

20 Q. Mr. Peterson, you mentioned going to the trial.
21 Would you be willing to travel to North Carolina to attend
22 trial?

23 A. Yes, ma'am, I'm ready to go today.

24 Q. And you would be willing to go for an extended
25 period of time to be at that trial; is that correct?

1 A. Yes, ma'am. (Unintelligible.)

2 (Whereupon, the witness responded with a lengthy
3 uninterrupted answer which was largely unintelligible
4 and unreportable. Per discussion, counsel will make
5 provisions subsequent to the deposition for acquiring
6 the answer.)

7 MS. PLATT: Why don't we take a break until
8 Mrs. Peterson can get the software back up? I think
9 most of my other questions are longer questions and
10 we can discuss that.

11 MR. ROMANO: Okay.

12 THE VIDEOGRAPHER: Off the record at 12:01.

13 (Recess.)

14 THE VIDEOGRAPHER: Okay. We are back on the
15 record at 12:21.

16 Q. (By Ms. Platt) Mr. Peterson, did you do any
17 preparation for this deposition today?

18 A. Notice of deposition (unintelligible).

19 Q. You saw the notice of deposition and you met
20 with your attorney; is that correct?

21 A. Say again.

22 Q. You saw the notice of deposition and you met
23 with your attorney; is that correct?

24 A. Yes, and I saw the master complaint and the
25 answer to the master complaint.

1 Q. The master complaint and the answers to the
2 master complaint?

3 A. Yes (unintelligible).

4 Q. I'm not sure I got that last document. What was
5 that?

6 A. Website.

7 Q. The website?

8 A. (Unintelligible.)

9 Q. Okay. And did you speak with your attorneys
10 prior to this deposition?

11 A. (Unintelligible.)

12 Q. And other than the documents you listed, was
13 there anything else you reviewed prior to this deposition?

14 A. Yes.

15 Q. "Yes"?

16 A. Yes.

17 Q. Can you tell me what you reviewed?

18 A. (Unintelligible.)

19 (Whereupon, the witness responded with an
20 uninterrupted answer which was largely unintelligible
21 and unreportable. Per discussion, counsel will make
22 provisions subsequent to the deposition for acquiring
23 the answer.)

24 Q. And, Mr. Peterson, what year did you find out
25 that the water at Camp Lejeune was contaminated?

1 A. Two or three years ago.

2 Q. I'm sorry, I did not --

3 A. Two or three years ago. Two or three years ago.

4 Q. Thirty years ago?

5 A. Two to three.

6 THE REPORTER: Two or three years ago?

7 Q. (By Ms. Platt) Two to three years ago?

8 A. (Unintelligible.)

9 (Whereupon, the witness responded with a lengthy
10 uninterrupted answer which was largely unintelligible
11 and unreportable. Per discussion, counsel will make
12 provisions subsequent to the deposition for acquiring
13 the answer.)

14 Q. Well, thank you for answering my questions,
15 Mr. Peterson. I really appreciate your time today.
16 That's all the questions I have, and I wanted to thank you
17 again for your service to this country.

18 A. Thank you.

19 Q. We do really appreciate it.

20 A. (Unintelligible.)

21 MS. PLATT: Just for the record, Mr. Peterson's
22 counsel and I have agreed that we will serve
23 interrogatories to answer follow-up questions. Our
24 previous agreement will stand, that they're not
25 limited in number and they will follow the deposition

1 protocol for objections.

2 Do you have anything to add for the record?

3 MR. ROMANO: Agreed. We don't have any
4 questions at this time. We do want him to read and
5 sign this transcript. And I just want to make sure
6 that we take care of anything we're agreeing to while
7 we're still on the record.

8 MS. PLATT: You also proposed that you would not
9 state that this was the sole deposition if we needed
10 to follow up after interrogatories.

11 MR. ROMANO: No, no, we can -- I agree. We will
12 not do that. And so that we're clear on that, we do
13 understand there may be a need for the government to,
14 in essence, move forward with further questioning in
15 the line of deposition setting. And if you-all -- if
16 the government feels that is necessary, we're not
17 going to object to that. Okay.

18 I think that's it. If there's anything else we
19 need to discuss, you can call Marjorie or me or Ed
20 Bell.

21 MS. PLATT: Okay. And thank you all for your
22 time. We can go off the record.

23 THE VIDEOGRAPHER: Off the record at 12:31.

24 (Pause.)

25 THE REPORTER: And do you want a copy of this,

1 Mr. Romano?

2 MR. ROMANO: Yes.

3 THE REPORTER: Okay. Thank you.

4 (Deposition concluded at 12:34 p.m.)

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1 CERTIFICATE OF DEPONENT

2 I, Edgar Allen Peterson, IV, deponent in this
3 deposition, hereby certify that I have examined the
4 foregoing 33 pages and find them to contain a full, true,
5 and accurate transcription of the testimony as given by me
6 on February 8, 2024, in Memphis, Tennessee.

7	Page	Line	Correction/Reason
8	_____	_____	_____
9	_____	_____	_____
10	_____	_____	_____
11	_____	_____	_____
12	_____	_____	_____
13	_____	_____	_____
14	_____	_____	_____

15 This the _____ day of _____, 2024.

16
17 _____

18 EDGAR ALLEN PETERSON, IV

19 State of Tennessee

20 County of _____

21 Sworn to and subscribed before me, this the _____ day
22 of _____, 2024.

23 _____

24 NOTARY PUBLIC

25 MY COMMISSION EXPIRES _____


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CERTIFICATE OF COURT REPORTER

I, Kelly D. Brentz, Court Reporter and Notary Public do hereby certify that the foregoing 33 pages, and including this page, contain a true and accurate transcription of the testimony of Edgar Allen Peterson, IV, taken by me in the aforementioned matter at the time and place heretofore stated, by stenotype and later reduced to typewritten form under my supervision by means of computer-aided transcription.

I further certify that I am not in the employ of or related to any counsel or party in this matter and have no interest, monetary or otherwise, in the final outcome of this proceeding.

Witness my signature and seal this the 25th day of February 2024.


KELLY D. BRENTZ, CSR