

Exhibit 180

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA
SOUTHERN DIVISION
No. 7:23-CV-897

IN RE:)
CAMP LEJEUNE WATER LITIGATION)
This Document Relates To:)
ALL CASES)

VOLUME II

Continued remote videotaped deposition of
PETER GARY SHIELDS, M.D., a witness herein, held via
Zoom at the location of the witness in Columbus, Ohio,
beginning at 9:03 a.m. EDT, on Friday, June 6, 2025,
before Susan M. Gee, Registered Merit Reporter and
Certified Realtime Reporter and Notary Public in and
for the State of Ohio.

GOLKOW, a Veritext Division
877.370.3366 ph | 917.591.5672 fax

1 REMOTE APPEARANCES:

2 On Behalf of the Plaintiffs:

3 BELL LEGAL GROUP

4 BY: PATRICK TELAN, ESQUIRE

RANDY L. LEE, ESQUIRE

5 219 North Ridge Street

Georgetown, South Carolina 29440

6 843.546.2408

ptelan@belllegalgroup.com

7 rlee@belllegalgroup.com

8 On Behalf of Defendant United States of America:

9 U.S. DEPARTMENT OF JUSTICE

10 CIVIL DIVISION, TORTS BRANCH

BY: MARCUS O. TUBIN, ESQUIRE

11 SHARON SPRAYREGEN, ESQUIRE

LACRESHA A. JOHNSON, ESQUIRE

12 1100 L Street, N.W.

Washington, D.C. 20005

13 202.676.6531

marcus.o.tubin@usdoj.gov

14 sharon.v.sprayregen@usdoj.gov

lacresha.a.johnson@usdoj.gov

15 ALSO PRESENT:

16 Judy Diaz, Videographer

17 - - -

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

I N D E X

WITNESS: PETER GARY SHIELDS, M.D.

CONTINUED CROSS-EXAMINATION	PAGE
By Mr. Telan	339

EXHIBITS

NUMBER	DESCRIPTION	PAGE
Exhibit 33	Invoices from Dr. Shields and Ms. Wolfe (to be submitted)	345
Exhibit 34	Dr. Shields' notes	355

- - -

1 Q. Okay. What did you do to prepare for
2 your deposition today?

3 A. I re-read parts of my report, and I
4 focused on the notes that have been provided to you
5 and the citations in those notes.

6 Q. Wonderful. Do you happen --

7 A. One more thing. And I did have a
8 meeting with the attorneys.

9 Q. Okay. And when was that meeting?

10 A. Today is Friday. I believe that was
11 Wednesday.

12 Q. Okay. How long did that meeting last?

13 A. An hour, hour and a half, but we talked
14 about lots of different stuff, not just the
15 deposition.

16 Q. Okay. And what did you all discuss?

17 MR. TUBIN: Objection. Dr. Shields, to
18 the extent there's communications with the
19 attorneys, do not answer that question. It's
20 privileged, work product.

21 MR. TELAN: And the reason I'm asking,
22 Marcus, is because the deposition was still
23 continuing, so my position would be that he
24 was still an active deponent at that time, but
25 if your instruction is not to answer, which I

1 believe that's what it is, we can address that
2 later. Is that your instruction?

3 MR. TUBIN: Yeah. The objection is
4 work-product privilege, and the instruction is
5 not to answer.

6 BY MR. TELAN:

7 Q. Okay. Dr. Shields, do you have a copy
8 of the notes that you made in this case with you
9 today?

10 A. I do.

11 Q. And is it a single page or is it two
12 pages?

13 A. It looks like two pages.

14 Q. Okay. So the notes that I have end
15 with a line that says "Acheng." I'm assuming that may
16 be an abbreviation for Aschengrau, but "Acheng has
17 lower exp than clj." Is that the last line on your
18 notes or is there another page?

19 A. That's the last line of the first page.
20 The second page has an additional line and only one
21 line.

22 Q. Has one line. Could you read that line
23 into the record for us?

24 A. "Need to compare Cohn -- does not do
25 duration -- no length of residence -- they used inc"

1 i-n-c -- "cases over six years and compared
2 inc/expected by town."

3 Q. Would you translate that what means for
4 us, please?

5 A. Sure. "Need to compare Cohn -- does
6 not do duration -- no length of residence -- they use
7 incidents cases over six years and compared incidents
8 to expected by town."

9 Q. Okay. Did you review any of the
10 contracts that were produced in this case in
11 preparation for your deposition?

12 A. So, actually, that's a good point,
13 because I didn't mention that I did look through my
14 file for contracts, and I also looked through my files
15 for invoicing.

16 Q. Okay. Other than what was produced at
17 the last deposition, did you find any additional
18 contracts or agreements in your file?

19 A. No.

20 Q. And I think we chatted about this. I
21 just want to close the loop on this, but in the last
22 deposition, we didn't have any signed agreement from
23 2023 when you were retained. I'm taking it that you
24 haven't found any signed agreement from the date that
25 you were actually retained; is that fair?

1 A. We do that. So I'm just not sure what
2 you mean by date that I was retained, because that's
3 kind of a floating thing, but to shorten it, I don't
4 have any signed contracts from 2023.

5 Q. The only contract that I have signed is
6 from 2025. Is that the only signed contract that you
7 have?

8 A. That's my recollection. There are
9 other documents that I signed, and quite frankly, I
10 was not paying attention, as a nonlawyer, to what's a
11 contract versus what is a contract. But looking at
12 that, the only real contract is the amended contract
13 from 2025.

14 Q. And so would it be your testimony, to
15 the best of your knowledge, that there was no original
16 contract signed when you were retained in or around
17 August 22nd, 2023?

18 A. That looks to be the case.

19 Q. Have there been any further contract
20 modifications since your last deposition?

21 A. Gee, I'm not sure how to answer that.
22 We did have to modify something, whether it was the
23 contract or whatever, to include the billing for the
24 research assistant who pulled those articles that we
25 discussed at the last deposition.

1 Q. And so that is a new document that has
2 been generated since we last met a month or so ago?

3 A. I actually don't recall whether it was
4 a document, but it was some, something that had to
5 happen so that I can recover the costs for her.

6 Q. Okay. And what had to happen in order
7 for you to do that?

8 A. Well, because my understanding, and
9 quite frankly, I don't understand a lot of this, was,
10 you know, I turned in an invoice after the deposition,
11 and it included, you know, her fees and that, because
12 it wasn't done, some contract that wasn't allowed, so
13 I had to reissue the invoices separately for her.

14 Now that I -- now that I think about
15 it, I'm not sure that anything had been amended at
16 this point and that still being worked on so that she
17 would be covered under future invoices if I need her.

18 Q. And so the amendment that you made
19 would have retroactively applied to the work that she
20 had done prior to your deposition that would then
21 allow you to recover for that time?

22 A. I don't know whether it was an
23 amendment or something. What it looked to me, like
24 there was some other process that was happening to
25 cover her for the retrospective work.

1 Q. Okay. What I'd like for you to do is
2 I'm assuming you have a copy of that documentation
3 that you provided to the Department of Justice and the
4 attorneys there for you to be able to recover for her
5 work, correct?

6 A. It was an invoice solely for her time.

7 Q. What I'd like to have you do is get a
8 copy of that invoice and provide that to our court
9 reporter Susan, and we'll mark that invoice as the
10 first numbered exhibit to today's deposition. Okay?

11 A. With -- I mean, I've never done it that
12 way. I've never in a deposition have to go search for
13 documents. Usually what happens is you make the
14 request and Mr. Tubin will decide whether or not you
15 get it and how you get it. So I'm going to wait for
16 instruction from him about what to do.

17 Q. So but as I understand it, that
18 document that we've been talking about for the last
19 minute or so is not something that you previously
20 produced to us, correct?

21 A. It wasn't, and it wasn't generated
22 until after the deposition.

23 Q. But it reflects time spent going back
24 to before we took your deposition a month or so ago,
25 correct?

1 A. Sure. But no invoice had been
2 generated at the time of the deposition for her or for
3 me.

4 Q. Understand. So what was provided to us
5 at the last deposition would have been an incomplete
6 set of invoices for all of the time spent by you
7 and/or your assistant on this case, correct?

8 A. No, that's not correct.

9 MR. TUBIN: Objection to form.

10 A. That's not correct. There was no
11 invoice generated at the time of deposition for work
12 that I had done in preparation for the deposition.

13 BY MR. TELAN:

14 Q. Right. So -- so what -- okay.

15 But what I mean is what provided at the
16 deposition was an incomplete set of materials
17 reflecting all of your time and your assistant's time
18 up to that point, but now with the new amendment to
19 the invoices, that would bring us up to date on what
20 has been spent by you and your assistant in this case,
21 correct?

22 MR. TUBIN: Objection. Form.

23 BY MR. TELAN:

24 Q. There have been invoices generated
25 since the deposition that included time prior to the

1 deposition for me and for her.

2 MR. TELAN: So, Marcus, is there any
3 problem with him producing those invoices that
4 was requested, because it sounds like
5 Dr. Shields wanted to get approval from you
6 before he would send those to Susan. So...

7 MR. TUBIN: Right. So, typically, I
8 wouldn't do this during the deposition. I'd
9 ask for a demand. But I don't know the
10 logistics of doing it. If we can go off the
11 record for a moment, and I can speak with
12 someone and maybe see if it's possible.

13 MR. TELAN: Sure. We can go off the
14 record for a minute.

15 VIDEOGRAPHER: The time right now is
16 9:14 a.m. We're off the record.

17 (A recess was taken from 9:14 to 9:27.)

18 VIDEOGRAPHER: The time right now is
19 9:27 a.m. We're back on the record.

20 MR. TUBIN: So the United States is
21 going to object to the request. We're not
22 going to have Dr. Shields go and search for
23 documents right now. We're not conceding
24 there's anything responsive, and if you want
25 to make the request, we can consider it after

1 the deposition.

2 MR. TELAN: Just so -- and I'll just
3 make a record.

4 My position is that given Dr. Shields'
5 testimony this morning, he has recently
6 amended the invoicing to allow him to recover
7 for time spent for his assistant that predates
8 the deposition that we took a month or so ago.
9 My position is that that documentation should
10 have been included in the first set of
11 production to --

12 THE WITNESS: It didn't exist.

13 MR. TELAN: -- to comply with the
14 subpoena or at least had -- the testimony
15 should have reflected that there was
16 documentation that had been, not yet been
17 generated but was anticipated to be generated
18 that would then have been a more complete and
19 accurate representation of the time spent by
20 Dr. Shields and his assistant in his work to
21 date. So we would ask for that, and we can
22 take that up at a later date, but that is our
23 position.

24 MR. TUBIN: And I would just add that I
25 think there are a number of assumptions in

1 there about the status of processing, et
2 cetera that I'm not in a position to speak at
3 length right now, but, you know, we can take
4 it up later.

5 MR. TELAN: Okay. And I forgot to
6 mention, Dr. Shields, since we're by Zoom and
7 I'm not there with you, can we have an
8 agreement that there will be no conversations,
9 texting or communications during the active
10 course of questioning today?

11 A. Sure. I understand that.

12 BY MR. TELAN:

13 Q. Okay. Getting back to the kind of line
14 of questioning that we were on regarding your
15 assistant's time, when did you actually submit that to
16 the DOJ?

17 A. After the deposition.

18 Q. I mean, when, though, what date?

19 A. I don't know that offhand.

20 Q. Was it a day later? Was it more
21 recently, in the last week or somewhere in between?

22 A. Well, as I said before, it would have
23 been a few days after the deposition, but things had
24 to be revised, so things were going back and forth as
25 recently as this week.

1 Q. Okay. And when you say "things had to
2 be revised," were you speaking about the new contract?

3 A. No. The invoicing.

4 Q. Okay.

5 A. The invoicing had to separate out the
6 research assistant, and there was some back and forth
7 about how to do that so that it could be reimbursed.

8 Q. Was it one research assistant or more
9 than one?

10 A. Just one.

11 Q. What was the person's name?

12 A. Kelly Wolfe. We had discussed this at
13 the deposition extensively.

14 Q. Yep. How much time did you submit on
15 Ms. Wolfe's behalf?

16 A. I don't recall that.

17 Q. Any idea whatsoever?

18 A. Somewhere between 10 and 20 hours.

19 Q. Okay. And her effective billing rate
20 was how much?

21 A. I believe it's 96 an hour.

22 Q. So that the amended invoice would
23 reflect, in your best guess -- I'm not holding you to
24 an exact amount -- somewhere around a thousand
25 dollars?

1 A. No, because it was, I think, about 10
2 hours altogether, maybe a little more.

3 Q. At an effective rate of how much?

4 A. 96.

5 Q. So 96 times 10 would be \$960, about
6 there?

7 A. That is off. I seem to remember it
8 being closer to 8 or, 7 or 8 grand total.

9 Q. Okay. If, in fact, it was 7 or 8
10 grand, that would effectively represent somewhere
11 perhaps around 75 to 80 hours of Ms. Wolfe's time,
12 then?

13 A. That could be. There was 1,300
14 references.

15 Q. And would that have come then from
16 your, a computer different from the one you used at
17 your deposition a month or so ago, correct?

18 A. That's correct. As you recall, the
19 deposition laptop was a government laptop.

20 Q. Yep. Okay. So this invoicing would
21 come from your own personal laptop?

22 A. Well, from my own personal desktop
23 computer.

24 Q. And who was the person at the
25 Department of Justice that that would have been sent

1 to? Who were you corresponding with on that?

2 A. The attorneys and a paralegal at the
3 Department of Justice.

4 Q. Which attorneys?

5 A. Mr. Tubin, Ms. Sprayregen, and I don't
6 remember the paralegal's name. I think it's Elizabeth
7 something.

8 Q. Okay. Is there any more time other
9 than the time that we just discussed for your
10 assistant that has been submitted for reimbursement by
11 the Department of Justice -- I mean by you to the
12 Department of Justice other than what we've already
13 talked about?

14 A. I guess I don't understand. For
15 reimbursement, do you mean? Like an expense that I
16 had?

17 Q. For time spent on the case other than
18 what we've just talked about. I'm not interested in,
19 let's say, expenses for meals. I'm talking more of
20 your time or your assistant's time.

21 A. There was no more time for her. I have
22 done work since the deposition; that is, I'm not sure
23 if that invoice has been submitted or not. I just
24 don't remember whether I submitted another invoice
25 since then.

1 Q. Okay. And that work that you've done
2 since the deposition, is that what you told me about
3 before, that you would have gone back to read some of
4 your report and then have searched your files for the
5 notes, the contracts and the invoicing?

6 A. That would only be within the last day
7 or two. That invoice hasn't been generated.

8 Q. Say that one more time. I didn't get
9 that.

10 A. That invoice, that would only be within
11 the last day or two, and that invoice has not been
12 generated.

13 Q. Okay. So the invoice that has been
14 generated since the last deposition for your time,
15 what was that for?

16 A. It was for the time before the
17 deposition in preparation. I've done work since then,
18 but whether I generated that as an invoice or that's
19 gonna come up as a new invoice, I just don't recall.

20 Q. So what I'd like to do, and I'll ask
21 Mr. Tubin to give you approval to do that, is to
22 provide all of the invoices that you submitted for
23 yourself and/or your assistant to Mr. Tubin to provide
24 to the court reporter for a composite exhibit. I
25 think we had originally, Susan, asked to have, to

1 synch the invoicing from Ms. Wolfe, but we'll make it
2 as a composite exhibit to include both Dr. Shields'
3 invoices as well as Ms. Wolfe's, understanding that
4 Mr. Tubin may have an objection to that.

5 MR. TUBIN: It's the same objection.

6 We're not going to have him produce documents
7 in the middle of the deposition.

8 BY MR. TELAN:

9 Q. Are those documents, Dr. Shields, do
10 you have your computer with you in front of you?

11 A. Yes. That's what I'm on now.

12 Q. So you could, if given permission,
13 access the documents that we've been referencing and
14 simply email those to Ms. Gee, our court reporter, in
15 the event Mr. Tubin gave you approval to do so,
16 correct?

17 MR. TUBIN: Objection to form.

18 A. Well, it would take me some time on the
19 record to do that, because I want to make sure that
20 I'm actually giving you the latest, and quite frankly,
21 the current status of those invoices, I don't know if
22 they've been accepted or not because of the issues
23 around billings of the research assistant.

24 BY MR. TELAN:

25 Q. Understood. And I understand it might

1 take you some time to do that. I'm asking you, you
2 could physically do that, because the computer you
3 have actually contains that information, correct?

4 A. Sure. Yes.

5 MR. TELAN: Okay. All right. So let's
6 go through now -- we're going to mark your
7 notes as the next numbered exhibit to the
8 deposition. Susan, I think we're at -- is
9 that 34?

10 COURT REPORTER: Correct.

11 (Exhibit 34 was marked for
12 identification.)

13 BY MR. TELAN:

14 Q. So if you could, Dr. Shields, if you
15 could just get your notes out in front of you, that's
16 what we're going to be referencing here today. I can
17 share screen it, but it's probably quicker if you're
18 just looking at it as I am as well on my screen.

19 A. Yes, I have it.

20 Q. Okay. So the first line that I have on
21 the notes states, "As likely as not, at least as
22 likely as not is not in PubMed." What is that
23 referring to? Explain that, if you could, please.

24 A. We discussed this at the deposition.
25 If you do a search through the National Library of

1 Medicine database, which represents virtually every
2 scientific publication going back to the '40s and
3 '50s, if you type in the words, in quote, "likely as
4 not," so that would cover both those phrases, it comes
5 back "no results found" in any article.

6 Q. Okay. And these --

7 A. Is that it's not a scientific
8 construction -- construct.

9 Q. We chatted about that. No need to go
10 through that again.

11 The dates -- do these notes represent a
12 single entry or are they multiple entries by you over
13 multiple dates?

14 A. It's a living document, so it's over
15 multiple dates.

16 Q. Okay. So when, when was the first time
17 these notes were, you began creating what has now been
18 marked as Exhibit 34, and when is the last time that
19 you made an entry into Exhibit 34?

20 A. So I can't tell you the first time. It
21 would be sometime between the report and the
22 deposition, and the last time would be the deposition
23 date.

24 Q. Just so that I'm clear, these notes
25 were generated sometime after your report was

1 finalized but before your deposition; is that correct?

2 A. That's right.

3 MR. TUBIN: Objection.

4 BY MR. TELAN:

5 Q. And then the last entry or entries you
6 would have made into this document, Exhibit 34, would
7 have been when?

8 A. Sometime before the deposition.

9 Q. Before this deposition?

10 A. No. Before the full
11 six-hours-and-45-minute deposition.

12 Q. Okay. So there has been no entries
13 made into Exhibit 34 after the deposition that
14 occurred a month or so ago, correct?

15 A. That's correct.

16 Q. Okay. So let's go to the second line,
17 if we could. I can read it, but I need you to kind
18 of, to translate, if you can, abbreviations for that
19 second line, beginning with "Need to fix criticism of
20 seyy benzene." What does that mean, "s-e-y-y"?

21 A. S-e -- meta-analysis by Seyyedsalehi
22 for benzene and renal cell cancer.

23 Q. Did we cover this in your deposition?

24 MR. TUBIN: Objection to form.

25 A. I don't recall.

1 BY MR. TELAN:

2 Q. Okay. So what are you, what are you
3 saying in this line or through here?

4 A. So one of your experts, I believe it
5 was Dr. Madigan, had pointed out that I was
6 criticizing this specific meta-analysis, because it
7 didn't include any of the major cohorts, and the
8 point, which is correct, is that the major cohorts
9 don't include kidney cancer. So if there's no
10 estimate for kidney cancer risk, you can't include
11 that in the meta-analysis.

12 But that wasn't really the point of my
13 paragraph when I was reviewing that, but I saw how the
14 expert could interpret that. The point is, is that
15 these papers don't include kidney cancer when they
16 include numerous other cancers, including bladder
17 cancer, and so this is an example of publication bias,
18 because our best cohorts didn't put it into the table
19 where they reported other cancers.

20 Q. Okay. The third line there says, "not
21 cited ATSDR 2019 TCE." What does that mean?

22 A. Somewhere in my travels, there's a tox
23 profile for TCE from ATSDR. And somewhere along the
24 way, I realized that that wasn't cited. And for
25 completion, in retrospect, I would have liked to have

1 cited it. It doesn't impact any of my opinions.
2 There's nothing in there that's different. Then it
3 would just have been just another paragraph in the
4 regulatory review section that this document exists
5 and then, you know, provided a few-sentence summary.

6 Q. Okay. So what you were saying is that
7 you were going back, and when you looked at your
8 report, you were noting that you hadn't cited to that,
9 the 2019 tox profile?

10 A. That's right.

11 MR. TUBIN: Objection.

12 BY MR. TELAN:

13 Q. In the next line, it says, "Wang 2024
14 and Yu 2025 positive for everything benzene."

15 We talked about these at your last
16 deposition, did we not?

17 A. Yes, extensively.

18 Q. And, again, to date, has there been any
19 supplementation of your materials-considered list to
20 reflect addition or inclusion of either the Wang or
21 the Yu article referenced in Exhibit 34?

22 A. If you're asking me if there's been a
23 specific document, I'm not aware of one, but,
24 obviously, we discussed the deposition. As I said at
25 the deposition, my experience is that's where things

1 like that happen, and if it's mentioned then, then
2 it's officially supplemented, but I'm not a lawyer,
3 and I don't know about this jurisdiction.

4 Q. The next entry appears to be reference
5 to a specific article. Was that article -- I'm
6 guessing the article is "Cancer incidence in Swedish
7 oil refinery workers exposed to benzene." Is that an
8 article that was included in your materials-considered
9 list?

10 A. It wasn't cited in my report, so it
11 probably was not, and that's the point of this note,
12 for me to remember for the future reports, that this
13 was not cited.

14 Q. Okay. So this article was not cited to
15 or considered by you in your report itself; is that
16 correct?

17 MR. TUBIN: Objection to form.

18 A. In the report. I mean, I have
19 considered it. I am aware of it, and it was an
20 oversight that I didn't cite and wanted to review. In
21 my report prior to the deposition, I realized this was
22 not cited but should have been.

23 BY MR. TELAN:

24 Q. So you're saying you actually had this
25 article in your possession when you generated your

1 report that you did, in fact, consider it, but you
2 just inadvertently left it off of the
3 materials-considered list or didn't cite to it in your
4 report; is that correct?

5 A. That's a fair statement.

6 Q. There's a bullet point underneath that
7 article that starts with DOI and a colon, number 10.
8 Is that reference to the above article "Cancer
9 incidence in Swedish oil refinery workers," or is that
10 a different reference? I think it's the above one.
11 If you cut and paste that into Google, you'll figure
12 out pretty quickly whether that's the same or a
13 different one, but I'm pretty sure it's the same one.

14 And then the reference to "free
15 article," is that speaking to the cancer incidence
16 article we've chatted about or something different?

17 A. Yeah. I think what I just did is, you
18 know, blocked the -- you know, I copied what was in
19 PubMed, and those lines is the way it just printed
20 out. It's all the same reference.

21 Q. Okay. The next line down has a "https"
22 start to it. Is that a reference again to the above
23 article?

24 A. No. That's a different paper.

25 Q. Okay. And what paper is that?

1 A. It's a -- it's a paper that's got
2 nothing to do with the Camp Lejeune litigation. It is
3 a myelodysplastic syndrome paper. Again, it's a note
4 for me for future cases that might involve MDS if this
5 paper exists.

6 Q. So the reference that we're talking
7 about now, the https, refers to a paper that you
8 considered as part of your report or had nothing to do
9 with this case and you just put it in there as a
10 reminder to yourself that it exists?

11 A. It's more or less the latter. This was
12 actually published March 14th, 2025, and it's just
13 basically a recent paper by the date of cigarette
14 smoking and myelodysplastic syndromes.

15 Q. But your opinion is that it has nothing
16 to do with Camp Lejeune and, therefore, has no bearing
17 on your opinions?

18 A. As far as I know, Camp Lejeune does not
19 involve MDS, and so it would have no bearing.

20 Q. So why would you put that on your notes
21 that would be included in this case?

22 A. Because, as we discussed in my
23 deposition, I don't rewrite a report from scratch for
24 every case. I will, you know, use parts of this for
25 future cases. And so if I go and need to pull this, I

1 know that that exists and I need to add it to a future
2 report in a different case.

3 Q. Okay. The next line, would you read
4 that in and explain what it is you're referencing
5 there, please?

6 A. Sure. And these were things that were
7 in my rebuttal reports for, I think, Dr. Madigan,
8 maybe Dr. Savitz as well. It's for a weight of
9 evidence, generally Cochrane, see all the chapters.
10 And this is for doing Cochrane reviews, and there's a
11 URL for that. And the next one is more specific to
12 the Cochrane about meta-analyses and that there's a
13 whole section on heterogeneity. Again, these are
14 notes for future reports for me, except to the extent
15 that they are also incorporated into the rebuttal
16 reports.

17 Q. When you say "the rebuttal reports,"
18 you referenced Dr. Savitz and Dr. Madigan?

19 A. Right. So I have -- I believe I had
20 two of those rebuttal reports, and so this was in
21 them. But, again, if I write this, write a report for
22 a future case, I may or may not remember that I was
23 discussing this in those rebuttal reports, so it's
24 here for a future case.

25 Q. And I may be off. I just don't -- I

1 don't remember speaking with you about rebuttal
2 reports for Dr. Savitz and Dr. Madigan at your past
3 deposition. Is that -- is that an activity that would
4 have been reflected in the bills you produced to us?

5 A. Yes. And you probably -- you should
6 have had the reports as well. I mean, you didn't ask
7 me about any of the plaintiff expert reports.

8 Q. We talked about your reports, and I
9 don't remember being told at the last deposition that
10 you had done rebuttal reports for Dr. Savitz and
11 Dr. Madigan, and my memory may be off on that, but do
12 you recall discussing that at the last deposition?

13 A. I don't recall. Again, that would have
14 come up if you would have asked me about any of my
15 criticisms to your plaintiffs' experts, but you
16 didn't.

17 Q. When did you generate a rebuttal report
18 for Dr. Savitz and/or Dr. Madigan?

19 MR. TUBIN: Objection to form.

20 A. Sometime after my, my report.

21 BY MR. TELAN:

22 Q. Yes. So I'll break it up in light of
23 the objection. When did you generate a rebuttal
24 report as to Dr. Savitz?

25 MR. TUBIN: Objection to form.

1 A. So I don't recall, and I'm not finding
2 it easy in my files. It's my recollection that I had
3 done rebuttal reports. If you don't know about them,
4 maybe I didn't do it or maybe they weren't turned
5 over. I just provided it to the attorneys.

6 BY MR. TELAN:

7 Q. So but looking at your computer, do you
8 have a rebuttal report in your files there that you
9 could look to to answer my question as to when you
10 generated that report?

11 MR. TUBIN: Objection to form.

12 A. I may be mistaken, because I'm not
13 seeing one, so maybe I didn't generate one.

14 BY MR. TELAN:

15 Q. Are you saying you did not or you may
16 not have?

17 A. My initial recollection was that it
18 was, but as I'm looking through this, I'm not seeing
19 it, so likely it was just discussed in meetings with
20 attorneys.

21 Q. Okay. So now you're saying you did not
22 generate a rebuttal report as to Dr. Savitz, correct?

23 A. I'm not seeing it here, so I guess the
24 answer is I did not.

25 Q. You previously testified just a couple

1 minutes ago, you generated a rebuttal report as to
2 Dr. Madigan. Can you check to see if, in fact, your
3 computer contains a rebuttal report for Dr. Madigan?

4 MR. TUBIN: Objection.

5 A. I don't see that either, so I'm going
6 to revise what I said earlier about it, but either
7 way, the notes reflect my intent for the future report
8 to include things about Cochrane reviews.

9 BY MR. TELAN:

10 Q. Under the next line down, it starts
11 with "meta-analysis - see Cochrane."

12 A. Correct.

13 Q. Does that line and the next line down
14 all reflect your work on what you believed was perhaps
15 rebuttal reports or discussions with the Department of
16 Justice lawyers related to Dr. Savitz and Dr. Madigan?

17 MR. TUBIN: Objection. Privileged,
18 work product. Just to the extent any of this
19 gets into that territory, Dr. Shields, do not
20 answer regarding any discussions with counsel.

21 MR. TELAN: And, Marc, just so that I'm
22 clear, since he's written down here what this
23 applies to, I think I'm entitled to actually
24 probe what it is that references.

25

1 BY MR. TELAN:

2 Q. So let me ask it to you more broadly.
3 Dr. Shields, what does the next two lines on your
4 notes refer to?

5 A. Well, all three of those lines refer to
6 the website for the Cochrane reviews, and at least
7 one, and maybe just one of your experts, try to use
8 the Cochrane review to bolster their opinion, and so
9 it brought me to the Cochrane website. Cochrane is
10 actually not something that's used for environmental
11 exposures this way, but since your expert had done it,
12 I went to that website, and I'm generally familiar
13 with Cochrane's views. I know a lot of people who are
14 at the Cochrane in the UK, and so these are just
15 notes, particularly to at least one of your experts
16 who used the cite as a Cochrane. Maybe several of
17 them did.

18 Q. Okay. And, again, does this get back
19 to the idea that at, initially, five minutes ago or
20 so, you believe you had generated rebuttal reports
21 that would have addressed this, but now, having looked
22 at your computer, you're able to confirm that you did
23 not generate any such reports, correct?

24 MR. TUBIN: Objection to form.

25 A. That's -- that's the best I can give

1 you right now, yes.

2 BY MR. TELAN:

3 Q. But if rebuttal reports did exist, they
4 would be on the computer that you have with you and
5 are looking at today, correct?

6 A. Yes.

7 Q. And you didn't find them as you looked?

8 A. That's correct, with the quick search
9 and that sort of thing. So that would be a reliable
10 way of finding them, but it looks like I probably
11 didn't write a rebuttal report.

12 Q. The next line down references another
13 study, "Occupational exposures and kidney cancer among
14 25,000 male offshore petroleum industry workers." Is
15 that a study, number one, that you considered as part
16 of your report in this case?

17 A. No.

18 Q. Is that a study that you came to find
19 after your report was generated?

20 A. Well, to be more specific, it was
21 published after the report was generated.

22 Q. Okay. When did you come into
23 possession of that study?

24 A. I can't tell you. Sometime after it
25 was published. As you know, as I mentioned, I get a

1 weekly fee on relevant papers, and that likely showed
2 up there.

3 Q. Did you -- did you submit a
4 materials-considered supplement to reflect your
5 inclusion of this article, at least in the opinions
6 that you intend to offer at trial?

7 A. I'm not sure how to answer that. I
8 don't know what the rules are here for supplemental
9 disclosures, but I had no intent of bringing up this
10 article, since it wasn't in my report in any trial or
11 other proceedings.

12 Q. Did you read the article?

13 A. Yes.

14 Q. As you sit here today, do you have a
15 general memory of the thoughts of that article?

16 A. Sure. I mean, basically, as you can
17 see in the title, it's about kidney cancer and
18 offshore work, petroleum workers, and in this case, it
19 did not support the, the opinion that exposure at
20 least to crude oil and benzene increases the risk of
21 kidney cancer.

22 Q. So did you do any more searches after
23 your deposition? Go ahead.

24 A. I'm sorry. I was interrupting you, but
25 I was just gonna say, as you remember, every week, I

1 get a new feed from PubMed for any articles that use
2 the word "benzene" and related sort of topics, so I'm
3 always doing searches to make sure that I am current.

4 Q. Okay. I just lost your notes. I had
5 them up on my screen, and now I can't find them. Hold
6 on one second.

7 Okay. So I see now the next line that
8 I have down is the line that we talked about,
9 A-c-h-e-n-g. Could you -- did you translate that
10 already for me?

11 A. It says, Aschengrau has lower exposures
12 than clj, but that they have these -- Rdd is relative
13 dose or something. I'd have to look at the article to
14 remember the exact abbreviation, and that Bove 2014
15 has their levels that have been modeled and then
16 dismissed by Dr. Bove. And then it says, assume the
17 highest exposure for PCP -- for PCE or PCP, higher
18 than the Aschengrau.

19 Q. Explain what it is you're doing there
20 or intended to convey.

21 A. So that was -- that was my note. That
22 was not explicitly stated in the report where -- and
23 this actually refers to the next one, Cohn as well. I
24 went through the mental exercise of saying, okay, I've
25 got these published peer-reviewed papers by Aschengrau

1 and Cohn. Could I -- could I compare the levels of
2 exposure from those studies to those published by
3 Dr. Bove in 2014?

4 The bottom line is you can't because of
5 the way the articles are written, the data is
6 presented, notwithstanding the fact that Dr. Bove also
7 testified that the levels in his 2014 papers were not
8 reliable. But, either way, I was trying to do a
9 comparison, and you just can't do an apples-to-apples
10 comparison.

11 So, for example, Bove provides in that
12 table median and mean levels. Aschengrau provides it
13 as a range in the 90, 90th percentile. And so if you
14 look at the range, the ranges are higher in Aschengrau
15 than the Bove 2014, but without knowing the means and
16 medians and that sort of thing, you just can't make
17 that comparison. Plus, neither paper really is
18 helpful in terms of looking at duration of exposure.

19 So I put that in there to think through
20 this a little bit more, but as it turns out, it's just
21 not -- it's not something that can be done, and that
22 also is true for the Cohn paper.

23 Q. And both Aschengrau and Cohn were
24 included in the materials-considered list that you had
25 in your prior report, correct?

1 A. That's correct.

2 Q. And then page 2 of your notes, we just
3 chatted about that. Does that represent now all of
4 the notes that you have made in conjunction with this
5 case?

6 A. Yes.

7 Q. Okay.

8 MR. TELAN: So, Dr. Shields, I don't
9 have any further questions for you.

10 But, Marcus, did we reach an agreement
11 or not yet on production of the materials that
12 we had requested relative to the invoicing or
13 is it your position that we're not entitled to
14 those, to those materials?

15 MR. TUBIN: The position is we've not
16 reached an agreement yet.

17 MR. TELAN: Okay. What I'm going to do
18 is, in light of that, I'm just going to leave
19 the depo open, and that may be over your
20 objection, because I believe that we're
21 entitled to those materials. My position is
22 those should have been produced in conjunction
23 with the prior deposition, but that's
24 something we can work out later. But for
25 today, I don't have any further questions.

1 MR. TUBIN: Well, I'll object to
2 leaving it open. My understanding is those
3 documents did not exist at the time of the
4 prior deposition, so there was no way they
5 would have been produced or could have been
6 produced anyway. So to produce them now goes
7 beyond the scope of what was originally
8 contemplated for the first deposition, and
9 that's not how I see the purpose of this
10 deposition being, and I will object to it
11 being held open.

12 MR. TELAN: I understand and disagree
13 only because I believe that the request from
14 the initial deposition was we are entitled to
15 all documentation relative to his time spent,
16 and if either through oversight or intention
17 documents were generated that don't reflect
18 complete amounts of time, that we are entitled
19 to explore all documentation that reflects the
20 complete amount of time spent by Dr. Shields
21 and/or his staff in that space.

22 MR. TUBIN: We cannot produce at that
23 time what did not exist, and because it comes
24 into existence later doesn't entitle you to
25 further deposition on it.

1 MR. TELAN: I disagree on that,
2 because, as I previously said, we're entitled
3 to all of the amount of time, to question him
4 about all the amount of time that he spent on
5 the deposition. And now that we know that the
6 time has been amended, we're entitled to query
7 him on that. So I don't know that we resolve
8 it today, but I understand your position, and
9 I think both of our respective positions are
10 reflected on the record.

11 MR. TUBIN: And if it's being held
12 open, then I believe the billing agreement
13 should apply. Is PLG intending to pay for
14 Dr. Shields' time for any additional
15 questioning?

16 MR. TELAN: No. We're just -- we're
17 just holding it open to leave this open for
18 questioning on this particular issue, and that
19 is a matter that the court has to decide on.
20 So, you know, that's -- we're not going to pay
21 for him waiting to hear back on this
22 particular issue, because he doesn't have to
23 do any work. It's a document that's already
24 been generated, so that's my --

25 MR. TUBIN: I'm talking about if

1 there's a subsequent deposition.

2 MR. TELAN: Oh, if there's a subsequent
3 deposition on this issue, then, yeah, we would
4 pay for his time on that, on that issue.

5 MS. SPRAYREGEN: I just want to say
6 Ms. Wolfe's time was, in fact, reflected in
7 records that you received prior to the
8 deposition. It just wasn't in a format that
9 the DOJ liked, so we asked for a redo, and
10 that's all it is, is the time in a different
11 way.

12 MR. TELAN: Well, I wouldn't be able to
13 vet that unless I've seen it, and I haven't
14 seen it. So until I see it, I don't know that
15 I can come to that conclusion. I like your
16 view, though, Sharon.

17 All right. Is there anything else?
18 Anything else, Marcus?

19 MR. TUBIN: Not from me.

20 MR. TELAN: Okay. Susan, thank you.
21 Dr. Shields, thank you.

22 THE WITNESS: Thank you.

23 MR. TELAN: I saw LaCresha's, at least
24 her name, not her face on the screen. So good
25 morning, LaCresha.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

MS. JOHNSON: Good morning, Pat.

VIDEOGRAPHER: The time right now is
10:07 a.m. We're off the record.

COURT REPORTER: Are you ordering this,
Mr. Telan?

MR. TELAN: I am. Thank you.

COURT REPORTER: And, Mr. Tubin, are
you ordering this?

MR. TUBIN: Yes.

COURT REPORTER: Same as before? You
need a rough and all that?

MR. TUBIN: Correct.

- - -

DEPOSITION ADJOURNED AT 10:08 A.M. EDT

- - -

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

C E R T I F I C A T E

State of Ohio :
:
County of Hamilton :

I, Susan M. Gee, Registered Merit Reporter and Certified Realtime Reporter, a duly commissioned Notary Public in and for the State of Ohio, duly commissioned and qualified, do hereby certify that the within-named PETER GARY SHIELDS, M.D., was duly sworn to testify to the truth, the whole truth, and nothing but the truth.

I DO FURTHER CERTIFY that the foregoing is a verbatim transcript of the testimony as taken stenographically by me at the time, place, and on the date hereinbefore set forth, to the best of my ability.

I DO FURTHER CERTIFY that I am neither a relative nor employee nor attorney nor counsel of any of the parties to this action, and that I am neither a relative nor employee of such attorney or counsel, and that I am not financially interested in the action.

IN WITNESS WHEREOF, I have hereunto set my hand and official seal of office at Cincinnati, Ohio, on this 24th day of June



S/ Susan M. Gee, RMR, CRR
Notary Public, State of Ohio
Registered Merit Reporter
Certified Realtime Reporter

My Commission Expires: September 20, 2025

1 STATE OF OHIO :
: SS
2 COUNTY OF _____:

3 I, PETER GARY SHIELDS, M.D., do hereby
4 certify that I have read the foregoing transcript of
5 my deposition given on June 6, 2025; that together
6 with the correction page attached thereto noting
7 changes to form or substance, if any, it is true and
8 correct.

9
10 _____
11 PETER GARY SHIELDS, M.D.

12
13 I do hereby certify that the foregoing
14 transcript of the deposition of PETER GARY SHIELDS,
15 M.D., was submitted to the witness for reading and
16 signing; that after he had stated to the undersigned
17 Notary Public that he had read and examined his
18 deposition, he signed the same in my presence on this
19 _____ day of _____, 2025.

20
21 _____
22 NOTARY PUBLIC - STATE OF OHIO

23
24 My commission expires: _____
25 - - -

1	29440 337:5	897 336:4	acheng 341:15
1,300 351:13	3	9	341:16
10 350:18	33 338:9	90 371:13	action 377:12
351:1,5 361:7	339 338:5	90th 371:13	377:13
10:07 376:3	34 338:10	917.591.5672	active 340:24
10:08 376:14	355:9,11	336:25	349:9
1100 337:12	356:18,19	96 350:21	activity 364:3
14th 362:12	357:6,13	351:4,5	actually 342:12
2	359:21	960 351:5	342:25 344:3
2 372:2	345 338:9	9:03 336:16	349:15 354:20
20 350:18	355 338:10	339:5	355:3 360:24
377:21	4	9:14 347:16,17	362:12 366:23
20005 337:12	40s 356:2	9:27 347:17,19	367:10 370:23
2014 370:14	45 357:11	a	add 348:24
371:3,7,15	5	a.m. 336:16	363:1
2019 358:21	50s 356:3	339:5 347:16	addition
359:9	6	347:19 376:3	359:20
202.676.6531	6 336:16 378:5	376:14	additional
337:13	6th 339:4	abbreviation	341:20 342:17
2023 342:23	7	341:16 370:14	374:14
343:4,17	7 351:8,9	abbreviations	address 341:1
2024 359:13	75 351:11	357:18	addressed
2025 336:16	7:23 336:4	ability 377:10	367:21
339:4 343:6,13	8	able 345:4	adjourned
359:14 362:12	8 351:8,8,9	367:22 375:12	376:14
377:15,21	80 351:11	above 361:8,10	age 339:10
378:5,19	843.546.2408	361:22	ago 344:2
219 337:5	337:6	accepted	345:24 348:8
22nd 343:17	877.370.3366	354:22	351:17 357:14
24th 377:15	336:25	access 354:13	366:1 367:19
25,000 368:14		accurate	agreement
27502 377:16		348:19	342:22,24
			349:8 372:10
			372:16 374:12

agreements 342:18 ahead 369:23 allow 339:19 344:21 348:6 allowed 344:12 altogether 351:2 amended 343:12 344:15 348:6 350:22 374:6 amendment 344:18,23 346:18 america 337:8 amount 350:24 373:20 374:3,4 amounts 373:18 analyses 363:12 analysis 357:21 358:6,11 366:11 answer 339:23 340:19,25 341:5 343:21 365:9,24 366:20 369:7 anticipated 348:17 anyway 373:6	appearances 337:1 appears 360:4 apples 371:9,9 applied 344:19 applies 366:23 apply 374:13 approval 347:5 353:21 354:15 article 356:5 359:21 360:5,5 360:6,8,14,25 361:7,8,15,16 361:23 369:5 369:10,12,15 370:13 articles 343:24 370:1 371:5 aschengrau 341:16 370:11 370:18,25 371:12,14,23 asked 353:25 364:14 375:9 asking 340:21 355:1 359:22 assistant 343:24 346:7 346:20 348:7 348:20 350:6,8 352:10 353:23 354:23 assistant's 346:17 349:15	352:20 assume 370:16 assuming 341:15 345:2 assumptions 348:25 atsdr 358:21,23 attached 378:6 attention 343:10 attorney 377:11,12 attorneys 340:8 340:19 345:4 352:2,4 365:5 365:20 august 343:17 aware 359:23 360:19	behalf 337:2,8 350:15 believe 340:10 341:1 350:21 358:4 363:19 367:20 372:20 373:13 374:12 believed 366:14 bell 337:3 belllegalgrou... 337:6,7 benzene 357:20 357:22 359:14 360:7 369:20 370:2 best 343:15 350:23 358:18 367:25 377:9 beyond 373:7 bias 358:17 billing 343:23 350:19 374:12 billings 354:23 bills 364:4 bit 371:20 bladder 358:16 blocked 361:18 bolster 367:8 bottom 371:4 bove 370:14,16 371:3,6,11,15 branch 337:10 break 364:22
			b
		back 345:23 347:19 349:13 349:24 350:6 353:3 356:2,5 359:7 367:18 374:21 basically 362:13 369:16 bearing 362:16 362:19 began 356:17 beginning 336:16 357:19	

bring 346:19	377:4,19	cochrane's	comply 348:13
bringing 369:9	certify 377:5,8	367:13	composite
broadly 367:2	377:11 378:4	cohn 341:24	353:24 354:2
brought 367:9	378:13	342:5 370:23	computer
bullet 361:6	cetera 349:2	371:1,22,23	351:16,23
c	change 379:4	cohorts 358:7,8	354:10 355:2
c 342:1 370:9	changes 378:7	358:18	365:7 366:3
377:1,1	chapters 363:9	colon 361:7	367:22 368:4
camp 336:6	chatted 342:20	columbus	conceding
362:2,16,18	356:9 361:16	336:15	347:23
cancer 357:22	372:3	come 351:15,21	conclusion
358:9,10,15,17	check 366:2	353:19 364:14	375:15
360:6 361:8,15	cigarette	368:22 375:15	confirm 367:22
368:13 369:17	362:13	comes 356:4	conjunction
369:21	cincinnati	373:23	372:4,22
cancers 358:16	377:14	commission	consider
358:19	citations 340:5	377:21 378:24	347:25 361:1
carolina 336:2	cite 360:20	commissioned	considered
337:5	361:3 367:16	377:4,5	359:19 360:8
case 341:8	cited 358:21,24	communicati...	360:15,19
342:10 343:18	359:1,8 360:10	340:18 349:9	361:3 362:8
346:7,20	360:13,14,22	compare	368:15 369:4
352:17 362:9	civil 337:10	341:24 342:5	371:24
362:21,24	clear 356:24	371:1	construct 356:8
363:2,22,24	366:22	compared	construction
368:16 369:18	clj 341:17	342:1,7	356:8
372:5	370:12	comparison	contains 355:3
cases 336:8	close 342:21	371:9,10,17	366:3
342:1,7 362:4	closer 351:8	complete	contemplated
362:25	cochrane 363:9	348:18 373:18	373:8
cell 357:22	363:10,12	373:20	continuation
certified	366:8,11 367:6	completion	339:6
336:18 339:11	367:8,9,9,14,16	358:25	continued
			336:13 338:4

<p>339:13 continuing 340:23 contract 343:5 343:6,11,11,12 343:12,16,19 343:23 344:12 350:2 contracts 342:10,14,18 343:4 353:5 conversations 349:8 convey 370:20 copied 361:18 copy 341:7 345:2,8 correct 345:5 345:20,25 346:7,8,10,21 351:17,18 354:16 355:3 355:10 357:1 357:14,15 358:8 360:16 361:4 365:22 366:12 367:23 368:5,8 371:25 372:1 376:12 378:8 correction 378:6 corresponding 352:1</p>	<p>costs 344:5 counsel 366:20 377:11,12 county 377:3 378:2 couple 365:25 course 349:10 court 336:1 339:7 345:8 353:24 354:14 355:10 374:19 376:4,7,10 courtesy 339:22 cover 344:25 356:4 357:23 covered 344:17 creating 356:17 criticism 357:19 criticisms 364:15 criticizing 358:6 cross 338:4 339:13 crr 377:17 crude 369:20 current 354:21 370:3 cut 361:11 cv 336:4</p>	<p>d d 338:1 d.c. 337:12 data 371:5 database 356:1 date 339:4 342:24 343:2 346:19 348:21 348:22 349:18 356:23 359:18 362:13 377:9 dates 356:11,13 356:15 day 349:20 353:6,11 377:15 378:19 days 349:23 decide 345:14 374:19 defendant 337:8 demand 347:9 department 337:9 345:3 351:25 352:3 352:11,12 366:15 depo 372:19 deponent 340:24 deposed 339:12 deposition 336:13 340:2</p>	<p>340:15,22 342:11,17,22 343:20,25 344:10,20 345:10,12,22 345:24 346:2,5 346:11,12,16 346:25 347:1,8 348:1,8 349:17 349:23 350:13 351:17,19 352:22 353:2 353:14,17 354:7 355:8,24 356:22,22 357:1,8,9,11,13 357:23 359:16 359:24,25 360:21 362:23 364:3,9,12 369:23 372:23 373:4,8,10,14 373:25 374:5 375:1,3,8 376:14 378:5 378:14,18 description 338:8 desktop 351:22 diaz 337:17 339:2 different 340:14 351:16 359:2 361:10</p>
--	---	---	--

<p>361:13,16,24 363:2 375:10 disagree 373:12 374:1 disclosures 369:9 discuss 340:16 discussed 343:25 350:12 352:9 355:24 359:24 362:22 365:19 discussing 363:23 364:12 discussions 366:15,20 dismissed 370:16 district 336:1,2 division 336:3 336:24 337:10 document 336:7 344:1,4 345:18 356:14 357:6 359:4,23 374:23 documentation 345:2 348:9,16 373:15,19 documents 343:9 345:13 347:23 354:6,9 354:13 373:3 373:17</p>	<p>doi 361:7 doing 339:18 347:10 363:10 370:3,19 doj 349:16 375:9 dollars 350:25 dose 370:13 dr 338:9,10 339:6,15 340:17 341:7 347:5,22 348:4 348:20 349:6 354:2,9 355:14 358:5 363:7,8 363:18,18 364:2,2,10,11 364:18,18,24 365:22 366:2,3 366:16,16,19 367:3 370:16 371:3,6 372:8 373:20 374:14 375:21 duly 339:10 377:4,5,6 duration 341:25 342:6 371:18</p>	<p>earlier 366:6 eastern 336:2 easy 365:2 edt 336:16 376:14 effective 350:19 351:3 effectively 351:10 either 359:20 366:5,6 371:8 373:16 elizabeth 352:6 email 354:14 employee 377:11,12 entitle 373:24 entitled 366:23 372:13,21 373:14,18 374:2,6 entries 356:12 357:5,12 entry 356:12,19 357:5 360:4 environmental 367:10 esquire 337:4,4 337:10,11,11 estimate 358:10 et 349:1 event 354:15</p>	<p>evidence 363:9 exact 350:24 370:14 exactly 339:21 examination 338:4 339:13 examined 339:11 378:17 example 358:17 371:11 except 363:14 exercise 370:24 exhibit 338:9 338:10 345:10 353:24 354:2 355:7,11 356:18,19 357:6,13 359:21 exhibits 338:7 exist 348:12 368:3 373:3 existence 373:24 exists 359:4 362:5,10 363:1 exit 373:23 exp 341:17 expected 342:2 342:8 expense 352:15 expenses 352:19</p>
	e		
	<p>e 338:1 357:20 357:21 370:9 377:1,1 379:2</p>		

<p>experience 359:25</p> <p>expert 358:14 364:7 367:11</p> <p>experts 358:4 364:15 367:7 367:15</p> <p>expires 377:21 378:24</p> <p>explain 355:23 363:4 370:19</p> <p>explicitly 370:22</p> <p>explore 373:19</p> <p>exposed 360:7</p> <p>exposure 369:19 370:17 371:2,18</p> <p>exposures 367:11 368:13 370:11</p> <p>extensively 350:13 359:17</p> <p>extent 340:18 363:14 366:18</p>	<p>familiar 367:12</p> <p>far 362:18</p> <p>fax 336:25</p> <p>fee 369:1</p> <p>feed 370:1</p> <p>fees 344:11</p> <p>figure 361:11</p> <p>file 342:14,18</p> <p>files 342:14 353:4 365:2,8</p> <p>finalized 357:1</p> <p>financially 377:13</p> <p>find 342:17 368:7,18 370:5</p> <p>finding 365:1 368:10</p> <p>finish 339:20</p> <p>finished 339:22</p> <p>finishing 339:23</p> <p>first 339:10 341:19 345:10 348:10 355:20 356:16,20 373:8</p> <p>five 367:19</p> <p>fix 357:19</p> <p>floating 343:3</p> <p>focused 340:4</p> <p>follows 339:12</p> <p>foregoing 377:8 378:4,13</p>	<p>forgot 349:5</p> <p>form 346:9,22 354:17 357:24 360:17 364:19 364:25 365:11 367:24 378:7</p> <p>format 375:8</p> <p>forth 349:24 350:6 377:9</p> <p>found 342:24 356:5</p> <p>frankly 343:9 344:9 354:20</p> <p>free 361:14</p> <p>friday 336:16 340:10</p> <p>front 354:10 355:15</p> <p>full 357:10</p> <p>further 343:19 372:9,25 373:25 377:8 377:11</p> <p>future 344:17 360:12 362:4 362:25 363:1 363:14,22,24 366:7</p>	<p>378:14</p> <p>gee 336:17 339:7 343:21 354:14 377:4 377:17</p> <p>general 369:15</p> <p>generally 363:9 367:12</p> <p>generate 364:17,23 365:13,22 367:23</p> <p>generated 344:2 345:21 346:2,11,24 348:17,17 353:7,12,14,18 356:25 360:25 365:10 366:1 367:20 368:19 368:21 373:17 374:24</p> <p>georgetown 337:5</p> <p>getting 349:13</p> <p>give 339:22 353:21 367:25</p> <p>given 348:4 354:12 378:5</p> <p>giving 354:20</p> <p>go 345:12 347:10,13,22 355:6 356:9 357:16 362:25</p>
f			
<p>f 377:1</p> <p>face 375:24</p> <p>fact 351:9 361:1 366:2 371:6 375:6</p> <p>fair 339:24 342:25 361:5</p>			
		g	
		<p>g 370:9</p> <p>gary 336:14 338:3 339:9 377:6 378:3,11</p>	

<p>369:23 goes 373:6 going 345:15 345:23 347:21 347:22 349:24 354:6 355:6,16 356:2 359:7 366:5 372:17 372:18 374:20 golkow 336:24 339:3 gonna 353:19 369:25 good 339:15 342:12 375:24 376:1 google 361:11 government 351:19 grand 351:8,10 group 337:3 guess 350:23 352:14 365:23 guessing 360:6</p>	<p>happens 345:13 harder 339:20 hear 339:16 374:21 held 336:14 373:11 374:11 helpful 371:18 hereinafter 339:11 hereinbefore 377:9 hereunto 377:14 heterogeneity 363:13 higher 370:17 371:14 highest 370:17 hold 370:5 holding 350:23 374:17 hour 340:13,13 350:21 hours 350:18 351:2,11 357:11 https 361:21 362:7</p>	<p>identification 355:12 ii 336:11 impact 359:1 inadvertently 361:2 incidence 360:6 361:9,15 incidents 342:7 342:7 include 343:23 354:2 358:7,9 358:10,15,16 366:8 included 344:11 346:25 348:10 360:8 362:21 371:24 including 358:16 inclusion 359:20 369:5 incomplete 346:5,16 incorporated 363:15 increases 369:20 industry 368:14 information 355:3 initial 365:17 373:14</p>	<p>initially 367:19 instruction 340:25 341:2,4 345:16 intend 369:6 intended 370:20 intending 374:13 intent 366:7 369:9 intention 373:16 interested 352:18 377:13 interpret 358:14 interrupting 369:24 invoice 344:10 345:6,8,9 346:1,11 350:22 352:23 352:24 353:7 353:10,11,13 353:18,19 invoices 338:9 344:13,17 346:6,19,24 347:3 353:22 354:3,21 invoicing 342:15 348:6 350:3,5 351:20</p>
<p>h</p>	<p>i</p>		
<p>h 370:9 half 340:13 hamilton 377:3 hand 377:14 happen 340:6 344:5,6 360:1 happening 344:24</p>	<p>idea 339:19 350:17 367:19</p>		

353:5 354:1 372:12 involve 362:4 362:19 issue 374:18,22 375:3,4 issues 354:22	360:3 361:18 361:18 362:18 362:24 363:1 365:3 367:13 368:25 369:8 374:5,7,20 375:14	lejeune 336:6 362:2,16,18 length 341:25 342:6 349:3 levels 370:15 371:1,7,12 library 355:25 light 364:22 372:18 liked 358:25 375:9 likely 355:21 355:22 356:3 365:19 369:1 line 341:15,17 341:19,20,21 341:22,22 349:13 355:20 357:16,19 358:3,20 359:13 361:21 363:3 366:10 366:13,13 368:12 370:7,8 371:4 379:4 lines 361:19 367:3,5 list 359:19 360:9 361:3 371:24 litigation 336:6 339:3 362:2 little 339:20 351:2 371:20	living 356:14 location 336:15 logistics 347:10 long 340:12 look 342:13 365:9 370:13 371:14 looked 342:14 344:23 359:7 367:21 368:7 looking 343:11 355:18 365:7 365:18 368:5 371:18 looks 341:13 343:18 368:10 loop 342:21 lost 370:4 lot 344:9 367:13 lots 340:14 lower 341:17 370:11
j	knowing 371:15 knowledge 343:15		
johnson 337:11 376:1 judy 337:17 339:2 june 336:16 339:4 377:15 378:5 jurisdiction 360:3 justice 337:9 345:3 351:25 352:3,11,12 366:16	l		
	l 337:4,12 lacresha 337:11 375:25 lacresha's 375:23 lacresha.a.jo... 337:14 laptop 351:19 351:19,21 latest 354:20 lawful 339:10 lawyer 360:2 lawyers 366:16 leave 372:18 374:17 leaving 373:2 lee 337:4 left 361:2 legal 337:3 339:2		
k			
kelly 350:12 kidney 358:9 358:10,15 368:13 369:17 369:21 kind 343:3 349:13 357:17 know 339:21 344:10,11,22 347:9 349:3,19 354:21 359:5			
			m
			m 336:17 377:4 377:17 m.d. 336:14 338:3 339:9 377:6 378:3,11 378:15 made 341:8 344:18 356:19 357:6,13 372:4

madigan 358:5 363:7,18 364:2 364:11,18 366:2,3,16 major 358:7,8 make 345:13 347:25 348:3 354:1,19 370:3 371:16 male 368:14 marc 366:21 march 362:12 marcus 337:10 340:22 347:2 372:10 375:18 marcus.o.tubin 337:13 mark 345:9 355:6 marked 355:11 356:18 materials 346:16 359:19 360:8 361:3 369:4 371:24 372:11,14,21 matter 374:19 mds 362:4,19 meals 352:19 mean 343:2 345:11 346:15 349:18 352:11 352:15 357:20 358:21 360:18	364:6 369:16 371:12 means 342:3 371:15 median 371:12 medians 371:16 medicine 356:1 meeting 340:8 340:9,12 meetings 365:19 memory 364:11 369:15 mental 370:24 mention 342:13 349:6 mentioned 360:1 368:25 merit 336:17 377:4,18 met 344:2 meta 357:21 358:6,11 363:12 366:11 middle 354:7 minute 345:19 347:14 357:11 minutes 366:1 367:19 mistaken 365:12 modeled 370:15	modifications 343:20 modify 343:22 moment 347:11 month 344:2 345:24 348:8 351:17 357:14 morning 339:15 348:5 375:25 376:1 multiple 356:12,13,15 myelodyspla... 362:3,14	new 344:1 346:18 350:2 353:19 370:1 nonlawyer 343:10 north 336:2 337:5 notary 336:18 377:5,18 378:17,22 note 360:11 362:3 370:21 notes 338:10 340:4,5 341:8 341:14,18 353:5 355:7,15 355:21 356:11 356:17,24 362:20 363:14 366:7 367:4,15 370:4 372:2,4 noting 359:8 378:6 notwithstandi... 371:6 number 338:8 348:25 361:7 368:15 numbered 345:10 355:7 numerous 358:16
		n	
		n 338:1 342:1 370:9 n.w. 337:12 name 339:2 350:11 352:6 375:24 named 377:6 national 355:25 need 341:24 342:5 344:17 356:9 357:17 357:19 362:25 363:1 376:11 neither 371:17 377:11,12 never 345:11 345:12	

o	okay 339:16 340:1,9,12,16 341:7,14 342:9 342:16 344:6 345:1,10 346:14 349:5 349:13 350:1,4 350:19 351:9 351:20 352:8 353:1,13 355:5 355:20 356:6 356:16 357:12 357:16 358:2 358:20 359:6 360:14 361:21 361:25 363:3 365:21 367:18 368:22 370:4,7 370:24 372:7 372:17 375:20	oversight 360:20 373:16 own 351:21,22	paste 361:11 pat 376:1 patrick 337:4 pay 374:13,20 375:4 paying 343:10 pce 370:17 pcp 370:17,17 peer 370:25 people 367:13 percentile 371:13 perfectly 339:17 permission 354:12 person 339:21 351:24 person's 350:11 personal 351:21,22 peter 336:14 338:3 339:6,9 377:6 378:3,11 378:14 petroleum 368:14 369:18 ph 336:25 phrases 356:4 physically 355:2 place 377:9
o 337:10 object 347:21 373:1,10 objection 340:17 341:3 346:9,22 354:4 354:5,17 357:3 357:24 359:11 360:17 364:19 364:23,25 365:11 366:4 366:17 367:24 372:20 obviously 359:24 occupational 368:13 occurred 357:14 offer 369:6 offhand 349:19 office 377:14 official 377:14 officially 360:2 offshore 368:14 369:18 oh 375:2 ohio 336:15,19 377:2,5,14,18 378:1,22 oil 360:7 361:9 369:20	open 372:19 373:2,11 374:12,17,17 opinion 362:15 367:8 369:19 opinions 359:1 362:17 369:5 order 344:6 ordering 376:4 376:8 original 343:15 originally 353:25 373:7	p	
		page 338:4,8 341:11,18,19 341:20 372:2 378:6 379:4 pages 341:12 341:13 paper 361:24 361:25 362:1,3 362:5,7,13 371:17,22 papers 358:15 369:1 370:25 371:7 paragraph 358:13 359:3 paralegal 352:2 paralegal's 352:6 part 362:8 368:15 particular 374:18,22 particularly 367:15 parties 377:12 parts 340:3 362:24 past 364:2	

<p>plaintiff 364:7 plaintiffs 337:2 364:15 please 342:4 355:23 363:5 plg 374:13 plus 371:17 point 342:12 344:16 346:18 358:8,12,14 360:11 361:6 pointed 358:5 position 340:23 348:4,9,23 349:2 372:13 372:15,21 374:8 positions 374:9 positive 359:14 possession 360:25 368:23 possible 347:12 predates 348:7 preparation 342:11 346:12 353:17 prepare 340:1 presence 378:18 present 337:16 presented 371:6 pretty 361:12 361:13</p>	<p>previously 345:19 365:25 374:2 printed 361:19 prior 344:20 346:25 360:21 371:25 372:23 373:4 375:7 privilege 341:4 privileged 340:20 366:17 probably 355:17 360:11 364:5 368:10 probe 366:24 problem 347:3 proceedings 369:11 process 344:24 processing 349:1 produce 354:6 373:6,22 produced 342:10,16 345:20 364:4 372:22 373:5,6 producing 347:3 product 340:20 341:4 366:18 production 348:11 372:11</p>	<p>profile 358:23 359:9 provide 345:8 353:22,23 provided 340:4 345:3 346:4,15 359:5 365:5 provides 371:11,12 ptelan 337:6 public 336:18 377:5,18 378:17,22 publication 356:2 358:17 published 362:12 368:21 368:25 370:25 371:2 pubmed 355:22 361:19 370:1 pull 362:25 pulled 343:24 purpose 373:9 put 358:18 362:9,20 371:19</p>	<p>374:3 questioning 349:10,14 374:15,18 questions 372:9 372:25 quick 368:8 quicker 355:17 quickly 361:12 quite 343:9 344:9 354:20 quote 356:3</p>
			r
			<p>r 377:1 379:2,2 randy 337:4 range 371:13 371:14 ranges 371:14 rate 350:19 351:3 rdd 370:12 reach 372:10 reached 372:16 read 340:3 341:22 353:3 357:17 363:3 369:12 378:4 378:17 reading 378:15 real 343:12 realized 358:24 360:21</p>

<p>really 358:12 371:17</p> <p>realtime 336:18 377:4,19</p> <p>reason 340:21 379:6,8,10,12 379:14,16,18 379:20,22,24</p> <p>rebuttal 363:7 363:15,17,20 363:23 364:1 364:10,17,23 365:3,8,22 366:1,3,15 367:20 368:3 368:11</p> <p>recall 344:3 350:16 351:18 353:19 357:25 364:12,13 365:1</p> <p>received 375:7</p> <p>recent 362:13</p> <p>recently 348:5 349:21,25</p> <p>recess 347:17</p> <p>recollection 343:8 365:2,17</p> <p>record 339:1 341:23 347:11 347:14,16,19 348:3 354:19 374:10 376:3</p>	<p>records 375:7</p> <p>recover 344:5 344:21 345:4 348:6</p> <p>redo 375:9</p> <p>refer 367:4,5</p> <p>reference 360:4 361:8,10,14,20 361:22 362:6</p> <p>referenced 359:21 363:18</p> <p>references 351:14 366:24 368:12</p> <p>referencing 354:13 355:16 363:4</p> <p>referring 355:23</p> <p>refers 362:7 370:23</p> <p>refinery 360:7 361:9</p> <p>reflect 350:23 359:20 366:7 366:14 369:4 373:17</p> <p>reflected 348:15 364:4 374:10 375:6</p> <p>reflecting 346:17</p> <p>reflects 345:23 373:19</p>	<p>regarding 349:14 366:20</p> <p>registered 336:17 377:4 377:18</p> <p>regulatory 359:4</p> <p>reimbursed 350:7</p> <p>reimbursement 352:10,15</p> <p>reissue 344:13</p> <p>related 366:16 370:2</p> <p>relates 336:7</p> <p>relative 370:12 372:12 373:15 377:11,12</p> <p>relevant 369:1</p> <p>reliable 368:9 371:8</p> <p>remember 351:7 352:6,24 360:12 363:22 364:1,9 369:25 370:14</p> <p>reminder 362:10</p> <p>remote 336:13 337:1</p> <p>renal 357:22</p> <p>report 340:3 353:4 356:21 356:25 359:8</p>	<p>360:10,15,18 360:21 361:1,4 362:8,23 363:2 363:21 364:17 364:20,24 365:8,10,22 366:1,3,7 368:11,16,19 368:21 369:10 370:22 371:25</p> <p>reported 358:19</p> <p>reporter 336:17,18 339:7 345:9 353:24 354:14 355:10 376:4,7 376:10 377:4,4 377:18,19</p> <p>reports 360:12 363:7,14,16,17 363:20,23 364:2,6,7,8,10 365:3 366:15 367:20,23 368:3</p> <p>represent 351:10 356:11 372:3</p> <p>representation 348:19</p> <p>represents 356:1</p>
--	---	--	--

request 345:14 347:21,25 373:13 requested 347:4 372:12 research 343:24 350:6,8 354:23 residence 341:25 342:6 resolve 374:7 respective 374:9 responsive 347:24 results 356:5 retained 342:23,25 343:2,16 retroactively 344:19 retrospect 358:25 retrospective 344:25 review 342:9 359:4 360:20 367:8 reviewed 370:25 reviewing 358:13 reviews 363:10 366:8 367:6	revise 366:6 revised 349:24 350:2 rewrite 362:23 ridge 337:5 right 346:14 347:7,15,18,23 349:3 355:5 357:2 359:10 363:19 368:1 375:17 376:2 risk 358:10 369:20 rlee 337:7 rmr 377:17 rough 376:11 rules 369:8	scientific 356:2 356:7 scope 373:7 scratch 362:23 screen 355:17 355:18 370:5 375:24 seal 377:14 search 345:12 347:22 355:25 368:8 searched 353:4 searches 369:22 370:3 second 341:20 357:16,19 370:6 section 359:4 363:13 see 347:12 363:9 366:2,5 366:11 369:17 370:7 373:9 375:14 seeing 365:13 365:18,23 seem 351:7 seen 375:13,14 send 347:6 sent 351:25 sentence 359:5 separate 350:5 separately 344:13	september 377:21 services 339:3 set 346:6,16 348:10 377:9 377:14 several 367:16 seyy 357:20 seyyedsalehi 357:21 share 355:17 sharon 337:11 375:16 sharon.v.spra... 337:14 shields 336:14 338:3,9,10 339:7,9,15 340:17 341:7 347:5,22 348:4 348:20 349:6 354:2,9 355:14 366:19 367:3 372:8 373:20 374:14 375:21 377:6 378:3,11 378:14 shorten 343:3 showed 369:1 signature 377:16 signed 342:22 342:24 343:4,5 343:6,9,16
	s		
	s 357:20,21 377:17 savitz 363:8,18 364:2,10,18,24 365:22 366:16 saw 358:13 375:23 saying 358:3 359:6 360:24 365:15,21 370:24 says 341:15 358:20 359:13 370:11,16		

<p>378:18 signing 378:16 simply 354:14 single 341:11 356:12 sit 369:14 six 342:1,7 357:11 smoking 362:14 solely 345:6 sorry 369:24 sort 368:9 370:2 371:16 sounds 347:4 south 337:5 southern 336:3 space 373:21 speak 347:11 349:2 speaking 350:2 361:15 364:1 specific 358:6 359:23 360:5 363:11 368:20 spent 345:23 346:6,20 348:7 348:19 352:17 373:15,20 374:4 sprayregen 337:11 352:5 375:5</p>	<p>ss 377:2 378:1 staff 373:21 start 361:22 starts 361:7 366:10 state 336:19 377:2,5,18 378:1,22 stated 370:22 378:16 statement 361:5 states 336:1 337:8 347:20 355:21 status 349:1 354:21 stenographic... 377:9 street 337:5,12 studies 371:2 study 368:13 368:15,18,23 stuff 340:14 submit 349:15 350:14 369:3 submitted 338:9 352:10 352:23,24 353:22 378:15 subpoena 348:14 subsequent 375:1,2</p>	<p>substance 378:7 summary 359:5 supplement 369:4 supplemental 369:8 supplementat... 359:19 supplemented 360:2 support 369:19 sure 339:25 342:5 343:1,21 344:15 346:1 347:13 349:11 352:22 354:19 355:4 361:13 363:6 369:7,16 370:3 susan 336:17 339:7 345:9 347:6 353:25 355:8 375:20 377:4,17 swear 339:8 swedish 360:6 361:9 sworn 339:11 377:6 synch 354:1 syndrome 362:3</p>	<p>syndromes 362:14</p> <hr/> <p style="text-align: center;">t</p> <hr/> <p>t 377:1,1 379:2 table 358:18 371:12 take 348:22 349:3 354:18 355:1 taken 347:17 377:8 talked 340:13 352:13,18 359:15 364:8 370:8 talking 339:23 345:18 352:19 362:6 374:25 tce 358:21,23 telan 337:4 338:5 339:14 340:21 341:6 346:13,23 347:2,13 348:2 348:13 349:5 349:12 354:8 354:24 355:5 355:13 357:4 358:1 359:12 360:23 364:21 365:6,14 366:9 366:21 367:1 368:2 372:8,17</p>
--	---	---	---

373:12 374:1 374:16 375:2 375:12,20,23 376:5,6 tell 356:20 368:24 terms 371:18 territory 366:19 testified 365:25 371:7 testify 377:6 testimony 343:14 348:5 348:14 377:8 texting 349:9 thank 375:20 375:21,22 376:6 thereto 378:6 thing 340:7 343:3 368:9 371:16 things 349:23 349:24 350:1 359:25 363:6 366:8 think 342:20 344:14 348:25 351:1 352:6 353:25 355:8 361:10,17 363:7 366:23 371:19 374:9	third 358:20 thoughts 369:15 thousand 350:24 three 367:5 time 339:4 340:24 344:21 345:6,23 346:2 346:6,11,17,17 346:25 347:15 347:18 348:7 348:19 349:15 350:14 351:11 352:8,9,17,20 352:20,21 353:8,14,16 354:18 355:1 356:16,18,20 356:22 373:3 373:15,18,20 373:23 374:3,4 374:6,14 375:4 375:6,10 376:2 377:9 times 351:5 title 369:17 today 340:2,10 341:9 349:10 355:16 368:5 369:14 372:25 374:8 today's 339:4 345:10	together 378:5 told 353:2 364:9 took 345:24 348:8 topics 370:2 torts 337:10 total 351:8 town 342:2,8 tox 358:22 359:9 transcript 377:8 378:4,14 translate 342:3 357:18 370:9 travels 358:22 trial 369:6,10 true 371:22 378:7 truth 377:6,6,7 try 367:7 trying 371:8 tubin 337:10 340:17 341:3 345:14 346:9 346:22 347:7 347:20 348:24 352:5 353:21 353:23 354:4,5 354:15,17 357:3,24 359:11 360:17 364:19,25 365:11 366:4	366:17 367:24 372:15 373:1 373:22 374:11 374:25 375:19 376:7,9,12 turned 344:10 365:4 turns 371:20 two 341:11,13 353:7,11 363:20 367:3 type 356:3 typically 347:7 u u.s. 337:9 uk 367:14 under 344:17 366:10 underneath 361:6 undersigned 378:16 understand 344:9 345:17 346:4 349:11 352:14 354:25 373:12 374:8 understanding 344:8 354:3 373:2 understood 354:25
---	--	---	---

<p>united 336:1 337:8 347:20 url 363:11 usdoj.gov 337:13,14,14 use 342:6 362:24 367:7 370:1 used 341:25 351:16 367:10 367:16 usually 345:13</p>	<p>want 342:21 347:24 354:19 375:5 wanted 347:5 360:20 washington 337:12 water 336:6 way 339:23 345:12 358:24 361:19 366:7 367:11 368:10 371:5,8 373:4 375:11 we've 345:18 352:12,18 354:13 361:16 372:15 website 367:6,9 367:12 wednesday 340:11 week 349:21,25 369:25 weekly 369:1 weight 363:8 went 367:12 370:24</p>	<p>348:12 375:22 377:14 378:15 wolfe 338:9 350:12 354:1 wolfe's 350:15 351:11 354:3 375:6 wonderful 339:18 340:6 word 370:2 words 356:3 work 340:20 341:4 344:19 344:25 345:5 346:11 348:20 352:22 353:1 353:17 366:14 366:18 369:18 372:24 374:23 worked 344:16 workers 360:7 361:9 368:14 369:18 write 363:21,21 368:11 written 366:22 371:5</p>	<p>years 342:1,7 yep 350:14 351:20 yu 359:14,21</p>
<p style="text-align: center;">v</p>			z
<p>verbatim 377:8 veritext 336:24 versus 343:11 vet 375:13 videographer 337:17 339:1,3 347:15,18 376:2 videotaped 336:13 view 375:16 views 367:13 virtually 356:1 volume 336:11</p>	<p>whatsoever 350:17 whereof 377:14 witness 336:14 336:15 338:3 339:8,10</p>	<p style="text-align: center;">x</p> <p>x 338:1</p> <p style="text-align: center;">y</p> <p>y 357:20,20 yeah 341:3 361:17 375:3</p>	<p>zoom 336:15 339:19 349:6</p>
<p style="text-align: center;">w</p>			
<p>wait 345:15 waiting 374:21 wang 359:13 359:20</p>			

Federal Rules of Civil Procedure

Rule 30

(e) Review By the Witness; Changes.

(1) Review; Statement of Changes. On request by the deponent or a party before the deposition is completed, the deponent must be allowed 30 days after being notified by the officer that the transcript or recording is available in which:

(A) to review the transcript or recording; and

(B) if there are changes in form or substance, to sign a statement listing the changes and the reasons for making them.

(2) Changes Indicated in the Officer's Certificate.

The officer must note in the certificate prescribed by Rule 30(f)(1) whether a review was requested and, if so, must attach any changes the deponent makes during the 30-day period.

DISCLAIMER: THE FOREGOING FEDERAL PROCEDURE RULES ARE PROVIDED FOR INFORMATIONAL PURPOSES ONLY.

THE ABOVE RULES ARE CURRENT AS OF APRIL 1, 2019. PLEASE REFER TO THE APPLICABLE FEDERAL RULES OF CIVIL PROCEDURE FOR UP-TO-DATE INFORMATION.

VERITEXT LEGAL SOLUTIONS

COMPANY CERTIFICATE AND DISCLOSURE STATEMENT

Veritext Legal Solutions represents that the foregoing transcript is a true, correct and complete transcript of the colloquies, questions and answers as submitted by the court reporter. Veritext Legal Solutions further represents that the attached exhibits, if any, are true, correct and complete documents as submitted by the court reporter and/or attorneys in relation to this deposition and that the documents were processed in accordance with our litigation support and production standards.

Veritext Legal Solutions is committed to maintaining the confidentiality of client and witness information, in accordance with the regulations promulgated under the Health Insurance Portability and Accountability Act (HIPAA), as amended with respect to protected health information and the Gramm-Leach-Bliley Act, as amended, with respect to Personally Identifiable Information (PII). Physical transcripts and exhibits are managed under strict facility and personnel access controls. Electronic files of documents are stored in encrypted form and are transmitted in an encrypted

fashion to authenticated parties who are permitted to access the material. Our data is hosted in a Tier 4 SSAE 16 certified facility.

Veritext Legal Solutions complies with all federal and State regulations with respect to the provision of court reporting services, and maintains its neutrality and independence regardless of relationship or the financial outcome of any litigation. Veritext requires adherence to the foregoing professional and ethical standards from all of its subcontractors in their independent contractor agreements.

Inquiries about Veritext Legal Solutions' confidentiality and security policies and practices should be directed to Veritext's Client Services Associates indicated on the cover of this document or at www.veritext.com.