

# Exhibit 359

**DR. JOHN SFAKIANOS – SUPPLEMENTAL MATERIALS CONSIDERED LIST**

**Specific Causation Expert Report of John Sfakianos, MD**

**Bladder Cancer – February 7, 2025**

**Additional Bates Numbered Medical Records Considered regarding Mark Cagiano:**

00569\_CAGIANO\_0000004182 - 0000004353  
00569\_CAGIANO\_0000004385 – 0000004455  
00569\_CAGIANO\_0000004456 - 0000004466  
00569\_CAGIANO\_AG\_0000000001 - 0000000162  
00569\_CAGIANO\_APFM\_0000000220 - 0000000246  
00569\_CAGIANO\_VBA\_0000004558 - 0000004559  
00569\_CAGIANO\_VBA\_0000004767 - 0000004770  
00569\_CAGIANO\_VHA\_0000000037 - 0000000042  
00569\_CAGIANO\_WSU\_0000000780 - 0000000791  
00569\_CAGIANO\_PH\_0000000001 - 0000000006

**Additional Bates Numbered Medical Records Considered regarding Jimmy Laramore:**

00594\_LARAMORE\_0000004766 - 0000004770  
00594\_LARAMORE\_0000004902 - 00000049171  
00594\_LARAMORE\_0000006789 – 0000006790  
00594\_LARAMORE\_0000006791- 0000006795  
00594\_LARAMORE\_0000006787- 0000006788  
00594\_LARAMORE\_0000006631- 0000006632  
00594\_LARAMORE\_0000006633 - 0000006690  
00594\_LARAMORE\_0000006691 – 0000006745  
00594\_LARAMORE\_0000007106 - 0000008588  
00594\_LARAMORE\_VBA\_0000009471 - 000009492  
00594\_LARAMORE\_VBA\_0000009583 - 0000009593  
00594\_LARAMORE\_VBA\_0000009891 - 0000009908  
00594\_LARAMORE\_VBA\_0000009929 - 0000009936  
00594\_LARAMORE\_VBA\_0000009989 - 0000010045  
00594\_LARAMORE\_VBA\_0000010166 - 0000010428  
00594\_LARAMORE\_VBA\_0000010496 - 0000010505  
00594\_LARAMORE\_VBA\_0000010523 - 0000010551  
00594\_LARAMORE\_VBA\_0000010552 - 0000010585  
00594\_LARAMORE\_VBA\_0000010586 - 0000010748  
00594\_LARAMORE\_VBA\_0000010761 - 0000010773  
00594\_LARAMORE\_VBA\_0000010792 - 0000010936  
00594\_LARAMORE\_VBA\_0000011062 - 0000011225  
00594\_LARAMORE\_VBA\_0000011229 - 0000011385  
00594\_LARAMORE\_VBA\_0000011773 - 0000011814  
00594\_LARAMORE\_VBA\_0000012068 - 0000012111  
00594\_LARAMORE\_VBA\_0000012112 - 0000012159  
00594\_LARAMORE\_VBA\_0000012173 - 0000012360  
00594\_LARAMORE\_VBA\_0000012526 - 0000012541

00594\_LARAMORE\_VBA\_0000012577 - 0000012787  
00594\_LARAMORE\_VBA\_0000012808 - 0000013036  
00594\_LARAMORE\_VBA\_0000013396 - 0000013543  
00594\_LARAMORE\_VBA\_0000013544 - 0000013609  
00594\_LARAMORE\_VBA\_0000013649 - 0000013813  
00594\_LARAMORE\_VBA\_0000013814 - 0000014122  
00594\_LARAMORE\_VBA\_0000014123 - 0000014124  
00594\_LARAMORE\_VBA\_0000014136 - 0000014143  
00594\_LARAMORE\_VHA\_0000004841 - 0000004894  
00594\_LARAMORE\_VHA\_0000004895 - 0000004904

### **Deposition Testimony**

Deposition, Dr. Thomas Longo, June 16, 2025

Deposition of Dr. Benjamin Hatten, May 12, 2025

Deposition of Dr. Kathleen Gilbert, April 11, 2025

Deposition of Dr. Laura Plunkett, May 12, 2025

Deposition of Dr. Stephen Culp, May 8, 2025

Deposition of Dr. Steven Bird, May 14, 2025

### **Expert Reports**

Corrected Expert Report of Steven Bird, MD – Plaintiff Jimmy Laramore

Corrected Expert Report of Steven Bird, MD – Plaintiff Mark Cagiano

*Cagiano v. United States* Expert Report of Max Kates M.D., Dated April 8, 2025

*Laramore v. United States* Expert Report of Max Kates M.D., Dated April 8, 2025

General Causation Report of Michael McCabe, Ph.D. – Bladder Cancer, Dated February 7, 2025

### **Additional Studies Considered**

Volkel, W., Friedewald, M., Lederer, E., Pahler, A., Parker, J., Dekant, W., 1998. Biotransformation of perchloroethene: dose-dependent excretion of trichloroacetic acid, dichloroacetic acid, and *N*-acetyl-*S*-(trichlorovinyl)-l-cysteine in rats and humans after inhalation. *Toxicol. Appl. Pharmacol.* 153(1), 20–27.

Vlaanderen J, Straif K, Ruder A, Blair A, Hansen J, Lynge E, et al. 2014. Tetrachloroethylene exposure and bladder cancer risk: a meta-analysis of dry-cleaning worker studies. *Environ Health Perspect* 122(7):661-666. <https://doi.org/10.1289/ehp.1307055>.

Guyton KZ, Hogan KA, Scott CS, Cooper GS, Bale AS, Kopylev L, Barone S, Makris SL, Glenn B, Subramaniam RP, Gwinn MR, Dzubow RC, Chiu WA. Human health effects of tetrachloroethylene: key findings and scientific issues. *Environ Health Perspect.* 2014 Apr;122(4):325-34. doi: 10.1289/ehp.1307359.