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IN THE SUPERIOR COURT FOR THE STATE OF CALIFORNIA  
IN AND FOR THE COUNTY OF LOS ANGELES  
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JOSE ADOLFO TELLEZ, et al.,  
Plaintiff,  
vs.

Case No. BC312852

DOLE FOOD COMPANY, INC.; DOLE  
FRESH FRUIT COMPANY; STANDARD  
FRUIT COMPANY; STANDARD FRUIT  
AND STEAMSHIP COMPANY; THE DOW  
CHEMICAL COMPANY; OCCIDENTAL  
PETROLEUM CORPORATION (individually  
and doing business as OCCIDENTAL  
CHEMICAL COMPANY); OCCIDENTAL  
CHEMICAL COMPANY, individually;  
OCCIDENTAL CHEMICAL CORPORATION;  
AMVAC CHEMICAL CORPORATION, AND  
DOES 1 THROUGH 500, INCLUSIVE,  
Defendants.

-----/

DEPOSITION OF JOHN D. EXPERT, M.D., Ph.D  
April 14, 2007 at 10:00 (10:38) a.m.

Before: ERIC L. JOHNSON  
RPR, CSR #9771

Taken at:  
Jones Day  
San Francisco, California

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APPEARANCES

For the Plaintiffs:

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(Plaintiff's Exhibits 1-2 marked  
for identification)

JOHN D. EXPERT, M.D., Ph.D,  
the Witness herein, having been duly and regularly sworn  
by the Certified Shorthand Reporter, deposed and  
testified as follows:

MR. JONES: Before we start with the question  
and answers, the record should reflect that at 10:00 I  
received some documents for the first time, including  
Exhibit 3 to this deposition, entitled "Tellez  
Literature Review Notes."

(Plaintiff's Exhibit 3 marked  
for identification)

MR. JONES: Exhibit 4 to this deposition,  
"Reference Notes for the Tellez Case."

(Plaintiff's Exhibit 4 marked  
for identification)

MR. JONES: Exhibit 5, "Review of Tellez  
Cases," which in general appears to be a summary of  
information concerning each of the plaintiffs.

(Plaintiff's Exhibit 5 marked  
for identification)

MR. JONES: Some notes concerning the Ramirez  
study that starts with the word "Mark" that I have  
marked as Exhibit 6.

1 (Plaintiff's Exhibit 6 marked  
2 for identification)

3 MR. JONES: And some handwritten notes dated  
4 March 13th, 2007.

5 (Plaintiff's Exhibit 7 marked  
6 for identification)

7 MR. SHEPPARD: Is that Exhibit 7?

8 MR. JONES: Exhibit 7.

9 Q. If I didn't state it for the record, the notice  
10 of this deposition is Exhibit 1 and the designation of  
11 the witness and the subjects he's going to cover, as  
12 well as an attached CV, is Exhibit 2.

13 So I had to take some time this morning to read  
14 the newly produced documents before we started.

15 Q. Please state your name for the record.

16 A. Marc Expert.

17 Q. Dr. Expert, who hired you as a witness in this  
18 case?

19 A. Sharyl Smith.

20 Q. And what is your understanding of the  
21 defendants who have retained the attorneys that you are  
22 working with in this case?

23 A. My understanding is that it is Dole, Dow, and I  
24 believe Amvac.

25 Q. Is this the first time you have ever testified