

1 Q. At approximately what time did you first work
2 with the Aamptritol worker population of DBCP workers?

3 A. Approximately 1983.

4 Q. Which would be several years after the
5 fertility problem was discovered in 1977, correct?

6 A. Well, that would be seven years after -- six
7 years after 1977.

8 Q. So why did you become involved at that point in
9 time? Can you just explain that to me.

10 A. The people I was working with were reproductive
11 biologists and reproductive physicians, and I bring the
12 occupational epidemiology and occupational medicine
13 expertise, so together we really brought different
14 disciplines to that investigation.

15 Q. What was the focus of the research project
16 involving those workers?

17 A. The focus was primarily looking at long-term
18 outcome among the affected workers, but also looking at
19 various parameters within the measurement of semen
20 outcomes in the workers.

21 Q. And you were an author or co-author of papers
22 concerning the Aamptritol workers; is that correct?

23 A. That is correct.

24 Q. With the exception of papers concerning the
25 Aamptritol workers, have you ever published, authored,

1 or co-authored a paper concerning DBCP workers?

2 A. Single manuscript?

3 Q. I am not clear on what you mean by that, so let
4 me ask a better question: Have you published any paper
5 on DBCP that didn't relate to your research work on the
6 Oxy workers we have discussed?

7 A. No. It has been in my textbooks but not as a
8 single paper. That was the intent of my question. Not
9 that I recall anyway. I would have to -- I don't recall
10 any other papers.

11 Q. Have you done any work on other chemicals which
12 you have identified as reproductive toxins, besides
13 DBCP?

14 MR. SHEPPARD: Objection; vague.

15 THE WITNESS: I have done other work on
16 reproductive outcomes in agricultural workers, but not
17 with regard, in terms of the conclusions, to specific
18 chemicals.

19 MR. JONES: Q. And who funded that work on
20 reproductive outcomes?

21 A. The National Institute of Environmental Health
22 Sciences and National Institute of Occupational Safety
23 and Health.

24 Q. Did you have any reason to believe that the
25 agricultural workers you were studying in that

1 reproductive outcome research had been exposed to DBCP
2 specifically?

3 A. No.

4 Q. Was DBCP even part of the focus of that work?

5 A. Well, it had to do with agricultural work and
6 risk factors within that, but it didn't have to do with
7 DBCP, which had been banned well before that study.

8 Q. Doctor, do you believe that you are generally
9 familiar with the available published literature on
10 DBCP?

11 A. Yes.

12 Q. Did you review that to prepare for this case?

13 A. Yes.

14 Q. Did you attempt to get all available data on
15 banana workers who may have been exposed to DBCP,
16 including published articles relating to that subject?

17 A. Well, I attempted to get the literature that I
18 could obtain, and that I felt was appropriate for my
19 assignment.

20 Q. I am trying to find out if you specifically
21 attempted to obtain all published articles on reports
22 that banana workers were or are alleged to have been
23 affected by DBCP.

24 Did you do that?

25 A. Well, my answer is that I believe I had the

1 body of literature on that. I am not aware of any
2 important studies that I don't have, although it is
3 possible there was something that I didn't obtain.

4 Q. Did you have anyone assist you in doing
5 literature research or any other work on this case?

6 A. Yes.

7 Q. Who?

8 A. One of my research associates.

9 Q. Who?

10 A. The name --

11 Q. The name, please?

12 A. The name is Mary Stoecer.

13 MR. SHEPPARD: Is that her last name?

14 THE WITNESS: Well, her name was Mary Stoecer.
15 It is now Mary Maras dash Stoecer. I am not sure if she
16 still has the Stoecer as part of her last name.

17 MR. JONES: Q. Is Mary a medical student?

18 A. No.

19 Q. What type of researcher is she?

20 A. She's an epidemiologist.

21 Q. In one of the exhibits you have a note written
22 to Marc, spelled M-a-r-c. Who is that to?

23 MR. SHEPPARD: Can you point to the exhibit,
24 and let's be specific?

25 MR. JONES: Well, let's go through the exhibits

1 in order.

2 Q. Exhibit 2 is a designation of numerous experts
3 and the testimony they will provide in this case. Your
4 name appears at page 9.

5 Have you seen that description of the testimony
6 that you are anticipated to give in this case, before I
7 handed it to you?

8 A. Yes, I have.

9 Q. And have you had a chance to compare that to
10 your own list of the subjects you anticipate covering in
11 this case?

12 A. Well, I have looked at this and compared it to
13 what I am planning to talk about. So what I am planning
14 to talk about -- or what I am capable of talking about
15 is perhaps better phrasing.

16 Q. Okay. Is the description in Exhibit 2, on
17 page 9, of the subjects that you will cover,
18 comprehensive? That -- in other words, it lists every
19 subject you anticipate covering, with no omissions?

20 MR. MILLER: Objection; overly broad; vague and
21 ambiguous.

22 You certainly are entitled, Mr. Jones, to know
23 what this witness's opinions are going to be. But I am
24 sure you are not going to ask every conceivable question
25 that could be asked of him in this deposition today. We