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IN THE CIRCUIT COUNTY COURT
OF PUTNAM COUNTY, WEST VIRGINIA

NOYLE ALDRIDGE, et ux	:	CA-91-C-463
GLENN ARRINGTON, et ux	:	CA-91-C-436
CHARLES E. BLAIR, JR.	:	CA-91-C-298
CARL CLAY	:	CA-91-C-495
GEORGE W. ECHOLS	:	CA-91-C-499
BUEL GILLENWATER, et ux	:	CA-91-C-450
WALDO GRIFFITH, et ux	:	CA-91-C-451
ROBERT D. HUNT, et ux	:	CA-91-C-337
HUBERT JAMES, et ux	:	CA-91-C-342
HARRY JANNEY, et ux	:	CA-91-C-181
BOBBY E. MEANS, SR., et ux	:	CA-91-C-441
HAROLD C. MEEKS, et ux	:	CA-91-C-443
JOE B. PADILLA, et ux	:	CA-91-C-388
REXYALL J. WADE, et ux	:	CA-91-C-442
GEORGE C. WINES, et ux	:	CA-91-C-461

Plaintiffs,

vs.

APPALACHIAN POWER CO.,
et al.,

Defendants.

CORBETT & ASSOCIATES
Registered Professional Reporters
1400 French Street Wilmington, Delaware 19801
(302) 571-0510

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1 Deposition of BRUCE W. KARRH, M.D.,
2 taken pursuant to notice under West Virginia Rule of
3 Civil Procedure 30 (b) 6 before Judith B. Thorpe,
4 Court Reporter, in the offices of E.I. DU PONT DE
5 NEMOURS & COMPANY, DuPont Building, Room D-7004,
6 Wilmington, Delaware, on Monday, April 27, 1992,
7 beginning at 2:00 p.m. there being present:

8
9 JAMES H. RION, JR., ESQUIRE
10 NESS, MOTLEY, LOADHOLT, RICHARDSON & POOLE
11 151 Meeting Street, Suite 600
12 Post Office Box 1137
13 Charleston, South Carolina 29402
14 For Plaintiffs,

15
16 C. LYNN OLIVER, ESQUIRE
17 JACKSON & KELLY
18 1600 Laidley Tower
19 P.O. Box 553
20 Charleston, West Virginia 25322
21 For Defendant DuPont,

22
23 DAVID B. SIEGEL, ESQUIRE
24 CROWELL & MORING
 1001 Pennsylvania Avenue
 Washington, D.D. 20004-2505
 For Defendant DuPont,

 TAMARA C. SAMPSON, ESQUIRE
 LISA E. CHISMIRE, ESQUIRE
 E.I. DU PONT DE NEMOURS & CO.
 Wilmington, Delaware 19898
 In-House Counsel for Defendant DuPont,

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APPEARANCES: (Continued)

JEFFRY H. HALL, ESQUIRE
GOODWIN & GOODWIN
1500 One Valley Square
Charleston, West Virginia 25301
For Defendants NICO and A&I,

BRADLEY W. FITZGERALD, ESQUIRE
WOODS, ROGERS & HAZLEGROVE
Dominion Tower Suite 1400
10 South Jefferson Street
P.O. Box 14125
Roanoke, Virginia 24038-4125
For Defendants Appalachian Power,
Ohio Power,
Central Operating Co.,
Kentucky Power.

ALSO PRESENT:

J.P. BARNETTE, Legal Assistant
CALWELL & McCORMICK, L.C.
Suite 908
405 Capitol Street
P.O. Box 113
Charleston, West Virginia

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1 BRUCE W. KARRH, M.D., having first been
2 duly sworn according to law, was examined and
3 testified as follows:

4 - - - - -

5 MR. RION: Before we start the record I
6 am going to put a statement on that record. We're
7 going to create two separate transcripts today. The
8 first is going to be of Dr. Karrh as a corporate
9 representative designated under West Virginia Rule
10 30 (b) 6 to testify about certain specific matters,
11 and the second transcript will be a deposition of
12 Dr. Karrh as an individual with knowledge of
13 relevant facts and not taken specifically pursuant
14 to the 30 (b) 6 designation. And I guess I need to
15 put the transcript of both of these depositions so
16 that anybody who reads it in the future will know
17 that we've agreed for these depositions in the
18 pending trials that the deposition with regard to
19 the deposition of Dr. Karrh taken on June 4, 1991
20 and in the case of Harrison Vs. DuPont and others
21 that DuPont, neither DuPont nor the plaintiffs will
22 object to use of that deposition at trial on the
23 basis that the issues there were different, the
24 motive for cross-examination was different and that

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1 the deposition is therefore hearsay because of the
2 different issues and potential different motives for
3 cross-examination. So the matter in that deposition
4 will not have to be inquired into here.

5 MS. OLIVER: Now, let me also state for
6 the record what my understanding of that agreement
7 is which is simply that we will treat that
8 deposition as though it had been taken in this case.
9 Therefore, there will be no objection based on
10 hearsay. By "we" I do mean DuPont reserves it right
11 that to all other deposition objections can be made.

12 MR. HALL: For the record, I am Jeff
13 Hall here on behalf of one the other Defendants.
14 With regard to this stipulation agreement between
15 DuPont and the Plaintiffs on behalf of my clients we
16 were not party to the other case referred to and I'm
17 assuming that that agreement that that testimony
18 that was elicited in the other matter, I'm certainly
19 not waiving any objection that my clients may or may
20 not have regarding that deposition testimony as much
21 as we weren't represented in that proceeding nor to
22 my knowledge was there anyone there that had any
23 interest similar to those of my clients.

24 MR. FITZGERALD: Brad Fitzgerald for

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1 various other defendants. I would just join in that
2 statement that anything from the previous deposition
3 that is intended to be used against my clients that
4 we do not join in that stipulation.

5 BY MR. RION:

6 Q. Doctor, let's go back on the record. This
7 is, I don't know how you want to designate the
8 transcript. Just put for this transcript taken
9 under West Virginia Rule of Civil Procedure 30 (b) 6
10 and the other one just don't put anything, I guess.

11 MS. OLIVER: Let me just state on the
12 record that Dr. Karrh's questions and answers in the
13 case will be given pursuant to and in correspondance
14 with the response, the written response which was
15 filed to the Rule 30 (b) 6 notice of deposition on
16 behalf of DuPont on the 23rd of April 1992.

17 BY MR. RION:

18 Q. Doctor, one set of questions I have to ask
19 you concern the designation of you as the person
20 most knowledgeable about the relationship between
21 DuPont and the Industrial Hygiene Foundation or IHF.
22 I'll start with that. Generally is DuPont now a
23 member of the IHF?

24 A. I can't say with certainty right now, Mr.

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1 Rion, that we are. We have been up until very
2 recently if we're not now. I was consulted maybe
3 six months to a year ago about whether or not there
4 was enough value in continuing as a member of IHF to
5 continue that. I made a recommendation at that
6 time. I don't know what action was taken pursuant
7 to that.

8 Q. Do you know during what years previously
9 DuPont was a member of the IHF?

10 A. My understanding we probably joined
11 somewhere in the mid-thirties, '35 or '36. I'm not
12 that familiar with when IHF started and it was
13 probably not too long after that it started as an
14 entity that our membership was started. Our
15 membership was continuous until just recently if
16 we're not still a member.

17 Q. Do you know if as a member DuPont received
18 copies of the IHF Digest?

19 A. We receive a copy of a summary of various
20 articles that either comes out every six months or
21 every three months. I'm not sure which. I don't
22 know. I don't know if it's called the IHF Digest
23 but it's a summary of various articles, particularly
24 in the industrial hygiene and health areas that IHF

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1 compiles and we still receive that document.

2 Q. Is it your understanding that has been a
3 practice of the IHF to mail to its members a copy of
4 the abstracts to which you referred regarding
5 industrial hygiene issues?

6 A. I know it has been at least since the
7 probably the mid- to early seventies. From my own
8 personal knowledge I don't know whether it was
9 started prior to that.

10 Q. Could you briefly explain in your words
11 what the IHF is?

12 A. I'm not sure that I have enough firsthand
13 information about the IHF except that it has been
14 more or less a coordinating body that served to keep
15 up with the literature on various health issues
16 particularly as regards industrial hygiene. And by
17 membership in that you could avail yourself of this
18 summary of abstracts of articles that have come out
19 in the health areas and also participate in some of
20 the programs that IHF would put on in the industrial
21 hygiene occupational health areas.

22 Q. Would it be fair to say that the emphasis
23 of the IHF has been on recognition and, or one of
24 the emphases has been on the recognition and

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1 prevention of diseases that occur as a result of
2 various industrial exposures?

3 A. Hum, I think that that could be one of
4 their missions. I think their main mission has been
5 to assure that information pertaining to industrial
6 hygiene and occupational health issues is
7 disseminated to their membership for the membership
8 themselves to make the assessments of the
9 applicability of that information to their
10 activities.

11 Q. One of the primary, would it be fair to
12 say that one of the primary functions of IHF has
13 been to make available information to various
14 members of American industry so that those members
15 of industry can identify and then hopefully prevent
16 diseases caused by industrial exposures?

17 A. I think what they have principally tried
18 to do is make sure that their membership was aware
19 of articles that had come out. The abstracts really
20 are not sufficient to get a detailed understanding
21 of what the article says but it's sufficient to give
22 a knowledgeable person, an industrial hygienist or
23 an occupational health professional, enough
24 information to know whether or not that article may

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1 be applicable to their activities. They then can
2 get the original article.

3 Q. Abstracts that are made available to the
4 membership do include, at least a substantial
5 portion of the abstracts concern diseases caused by
6 industrial exposures?

7 MS. OLIVER: Objection to the form.

8 BY MR. RION:

9 Q. Would that be correct?

10 A. I have not looked at it lately although I
11 get a copy of it. I forward it on to our industrial
12 hygienist or the person in industrial hygiene so I
13 haven't looked at them in recent years. But when I
14 used to look at them most of their articles dealt
15 with occupational health issues and newer data that
16 may have been developed or either older data that
17 was being further amplified showing that whether or
18 not there could be some occupational health issues
19 pertaining to various occupational exposures such as
20 occupational activities.

21 Q. Okay. Would the copies of the abstracts
22 that DuPont received from the IHF be kept at Haskell
23 Laboratories or would they be kept in a different
24 library?

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1 A. Haskell may also get a copy of their own.
2 I can't speak to whether or not they keep a separate
3 file. The copy that I get is kept in our industrial
4 hygiene group in my organization.

5 Q. How long has that group been in existence,
6 do you know?

7 A. As a group since '84, I guess. 1984.

8 Q. Before that do you know where the
9 information sent from the IHF would have been kept?

10 A. It most likely would have been kept at
11 Haskell at that time.

12 Q. Doctor, you've also been designated to be
13 the person most knowledgeable about when DuPont
14 learned that asbestos could cause various diseases.
15 I want to ask you --

16 MS. OLIVER: Let me object to the
17 characterization. Perhaps it might be easier if we
18 just read it.

19 MR. RION: The designation was when you
20 first, you meaning DuPont, first learned that
21 inhaling asbestos dust could cause disease.

22 MS. OLIVER: I think it might be
23 helpful if we just go ahead and read it into the
24 record or what your response to that was because it

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1 does limit to some extent what Dr. Karrh's testimony
2 will cover.

3 Subject to the preliminary statement
4 and general objection DuPont's response to Request
5 Number 3 also states, "Defendant DuPont also objects
6 to this request on the grounds this it is vague,
7 overly broad, unduly burdensome and that the request
8 speaks to the general association between asbestos
9 and 'disease' and does not specify the type, amounts
10 and or concentrations of asbestos. DuPont cannot
11 determine from its record the precise date or name
12 of the person at DuPont who first learned of the
13 possibility of a causal connection between asbestos
14 and any particular 'disease'. See DuPont's response
15 Number 40 to Plaintiff's March 13, 1992
16 Interrogatories Request of Production of Documents.
17 DuPont designates Dr. Bruce Karrh to offer general
18 testimony concerning the subject."

19 BY MR. RION:

20 Q. Doctor, are you able or can you tell me
21 when DuPont first learned that there was a disease
22 called asbestosis?

23 A. I can't tell you with certainty, Mr. Rion,
24 as to when DuPont as such would have learned of

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1 that.

2 Q. And I think you, when did you first learn
3 there was a disease known as asbestosis?

4 MS. OLIVER: I'm going to object to
5 this question. You can ask him that question in the
6 second deposition if you would like to, Jackie, but
7 he is here today to talk what about DuPont knew and
8 what DuPont learned as opposed to when he did.

9 MS. RION: Well, I'm not sure. I think
10 the question is relevant in that he worked for
11 DuPont.

12 MS. OLIVER: He's not here today to
13 talk about what he learned as someone who worked for
14 DuPont; under the Rule 30 (b) 6 deposition he is
15 speaking for DuPont.

16 MR. RION: Are you going to tell him
17 not to answer the question?

18 MS. OLIVER: No, I'm simply asserting
19 an objection.

20 BY MR. RION:

21 Q. Okay. When did you first learn that there
22 was a disease called asbestosis?

23 A. I know I had learned by 1970. I'm not
24 sure exactly when I learned prior to that, whether I

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1 learned it in medical school or in subsequent
2 training, but at least by 1970 I had that knowledge.

3 Q. As a person designated for this deposition
4 to be the person most knowledgeable about when
5 DuPont learned that asbestos could cause disease
6 subject to the objections in the designation have
7 you made any attempt to review the information that
8 is contained in the corporate files of DuPont before
9 the date you began working here?

10 A. I have not made an attempt to review all
11 of the possible files that could exist and I have
12 not recently made any attempt to review them. When
13 I came to work for DuPont in 1970 I reviewed the
14 files that were available to me at that time at the
15 plants where I was. And I became knowledgeable
16 about what was contained in that file then.

17 Q. Do you recall, Dr. Karrh, if you don't I
18 can. I have got it here with me, I think you
19 probably remember everything in the last deposition
20 I took and at other times having looked at the
21 textbook Modern Occupational Medicine?

22 A. Yes, I have.

23 Q. Do you recall that there was a volume of
24 that published in 1960?

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1 A. Yes.

2 Q. And that included various DuPont authors?

3 A. Various authors who worked at DuPont.

4 Q. Who worked at DuPont. And it included a
5 discussion of the disease asbestosis.

6 A. Yes.

7 Q. Do you think it would be fair for me to
8 state that at least by 1960 that it was recognized
9 at Dupont that there was a disease known as
10 asbestosis?

11 A. I would have to look back at that book
12 again to determine exactly what the book said on
13 asbestosis to be able to answer.

14 MS. OLIVER: I'm also going to raise an
15 objection here, Jackie. This was a matter which was
16 gone into in great detail at the last deposition.
17 It is my understanding that the deposition here
18 today on these subjects is simply a follow up
19 deposition and we're not going to go back and repeat
20 the entire deposition again.

21 MR. RION: My question really is do you
22 agree that by 1960 it was recognized within DuPont
23 that there was a disease known as asbestosis and if
24 the doctor and I think referring to this text may

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1 help answer that question since he didn't go to work
2 until 1970 and you've designated him as being
3 somebody who's authorized to speak for the entire
4 time period.

5 BY MR. RION:

6 Q. I guess what I'd like you to do, doctor,
7 the question is this. Do you agree that by 1960 it
8 was recognized within DuPont that there was a
9 disease known as asbestosis? Since you were not
10 here then I want to ask you in answering that
11 question to refer briefly to this text which would
12 include the date of publication in 1960 -- these
13 tabs here, by the way, don't have anything to do
14 with what you're being asked to do -- who the
15 authors were and then maybe look briefly at the
16 section on occupational lung disease, excuse me,
17 chest disease by Dr. Scheper which is tabbed here in
18 the second volume and then maybe answer the
19 question.

20 A. This has obviously been rebound because
21 this is not the original binding.

22 Q. That's correct.

23 A. If I can -- and copied also. That is not
24 the original publication.

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1 The first, Part One, is Modern
2 Occupational Medicine by Drs. Fleming, D'Alonzo and
3 Zapp in 1960. It's a second edition.

4 MS. OLIVER: And as I understand it,
5 Jackie, what you're asking him to do is look at this
6 to see if it refreshes his recollection. Is that
7 what the question is at the moment?

8 BY MR. RION:

9 Q. The question is this. Do you agree that
10 by 1960 it was recognized within DuPont that there
11 was a disease known as asbestosis?

12 MS. OLIVER: We will put on the record
13 that the booklets that he is looking at are not
14 DuPont publications and therefore we object to your
15 suggestion that by reviewing those documents that
16 might help him answer his question in any way;
17 further, that any statements that are made within
18 that book are clear that the words speak for
19 themselves. There is no reason for Dr. Karrh to try
20 to interpret what is contained therein.

21 MR. RION: If I close my eyes during
22 the deposition I'm not trying to be rude. I didn't
23 bring my drops or I might go blind.

24 THE WITNESS: In this document, this

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1 book that I referred to earlier on page 463 there is
2 a section that is called Silicosis that has a
3 subsection Asbestosis. And it apparently describes
4 the state of knowledge of the author at least at
5 that time on asbestosis. And this particular
6 chapter was authored by Dr. C.W.H. S-c-h-e-p-e-r-s.
7 And at least this portrays Dr. Schepers' state of
8 knowledge at that time of asbestosis. I can't say
9 that it portrays what DuPont knew at that time but
10 it does apparently portray what Dr. Schepers knew at
11 that time.

12 Q. And he was employed by DuPont at the time?

13 MS. OLIVER: Objection to form.

14 BY MR. RION:

15 Q. Do you know?

16 A. My understanding is he was employed by
17 DuPont at Haskell Laboratory at that time as a
18 pathologist.

19 Q. Okay. I think that's a fair answer. Do
20 you know, doctor, as a corporate representative for
21 DuPont when DuPont became aware that there were
22 certain threshold limit values recommended for
23 control of asbestos dust or dust containing
24 asbestos?

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1 MS. OLIVER: Let me place an objection
2 on the record and state that I would like to clarify
3 what you mean by certain threshold record values?

4 MR. RION: All right. I don't think
5 that's objectionable but I don't mind clarifying.

6 MS. OLIVER: Confusing.

7 BY MR. RION:

8 Q. Doctor, do you know if or when DuPont
9 learned that there existed a recommendation that
10 asbestos dust or dust containing asbestos be kept
11 below the level of five million parts per cubic
12 foot?

13 A. I don't know when DuPont would have
14 learned of that. I don't know when the threshold
15 limit value list started being developed and kept.
16 I also don't know when they published the list on
17 five million fibers as part of the asbestos
18 exposure. I know within DuPont we have been
19 familiar with these threshold limit values, at least
20 throughout my career with DuPont.

21 Q. Is there a technical library at DuPont in
22 addition to the library that is kept at Haskell
23 Laboratories?

24 A. There is a technical library at DuPont,

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1 yes.

2 Q. Does it contain information concerning
3 industrial health matters?

4 A. The technical library takes a number of
5 different journals and I don't, I can't say with
6 certainty exactly what journals they take and which
7 ones they don't take. They are a resource library
8 for all of the company. If someone needs a
9 particular journal they can call the technical
10 library and if the technical library does not have
11 it then they have an exchange arrangement with other
12 libraries. There are libraries where they can
13 borrow it from.

14 Q. Doctor, from your previous deposition we
15 discussed generally the number of physicians
16 employed by DuPont at various times to your
17 knowledge. I want to ask you generally are most of
18 the doctors employed by DuPont including yourself
19 members of the American Medical Association?

20 MS. OLIVER: Let me stop here and raise
21 an objection. I believe we're getting outside the
22 scope of what Dr. Karrh has been asked to and
23 identified for to testify under the Rule 30 (b) 6
24 deposition. If you can explain to me, Jackie, how

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1 it comes in maybe I'll reconsider my objection.

2 MR. RION: I want to know generally the
3 source of information that DuPont had available to
4 it over the years including information that would
5 be distributed to them.

6 MS. OLIVER: I think that would be
7 better asked in his deposition other than under the
8 Rule 30 (b) 6 deposition. Here he's here simply to
9 talk about the subject which you asked and that was
10 when DuPont first learned that inhaling asbestos
11 could cause disease. He's not here to testify as a
12 corporate witness on sources of information or what
13 physicians may or may not have known. If you want
14 to ask him those questions with his second
15 deposition that is fine.

16 MR. RION: I didn't understand what
17 difference that made. When I was asked to do things
18 this way I was told that it would make some people
19 feel more secure and comfortable and I'll do a lot
20 of things to make people more comfortable but I
21 don't fully understand or agree with the reasons.
22 And this is getting so confusing that it's not
23 hardly worth the effort to me to try to accommodate
24 you all anymore.

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1 It might be easier -- I'll do the best
2 I can. And if I fail I'll agree that you're not
3 waiving that objection by not making it now. You
4 can go to judge at any time that I try using a
5 portion of this deposition and say I went outside
6 the scope of the designation. I personally don't
7 think whether the person who is a managerial
8 employee right now that makes a beans bit of
9 difference but it might. I'm not trying to be
10 difficult but --.

11 MS. OLIVER: I simply raise the
12 objection. I have not directed him not to answer.

13 BY MR. RION:

14 Q. Okay. Are you a member of the AMA?

15 A. Yes, I am.

16 Q. Do you believe that most of the doctors
17 who have been employed by DuPont during the time
18 you've been with DuPont are members of the AMA?

19 MS. OLIVER: Object to the form.

20 THE WITNESS: I really can't answer
21 that specifically. I can say that DuPont has
22 encouraged the physicians to be members of the state
23 medical societies in the states in which they are
24 located and members of the American Medical

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1 Association.

2 Q. Does duPont subscribe to the Journal of
3 the American Medical Association?

4 A. I don't know that DuPont as such
5 subscribed. Those physicians within DuPont who are
6 members of the AMA get the Journal because of their
7 membership.

8 Q. That would include you?

9 A. Yes.

10 Q. So as a matter, your understanding of what
11 AMA function is, if you pay your dues and belong you
12 get a copy of the journal?

13 MS. OLIVER: Objection to form.

14 THE WITNESS: Yes.

15 BY MR. RION:

16 Q. Do you know what in addition to what
17 various doctors can get through their medical
18 association memberships, does the Haskell Laboratory
19 or any of the other DuPont libraries subscribe to
20 medical journals?

21 MS. OLIVER: Objection to form.

22 THE WITNESS: Haskell Laboratory will
23 subscribe to some journals. I don't know now which
24 ones they subscribe to. I don't know whether any

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1 other libraries within DuPont subscribe to medical
2 journals or not.

3 BY MR. RION:

4 Q. Do you recall whether Haskell has ever
5 subscribed to any of the toxicological -- How do you
6 pronounce that?

7 A. Toxicological.

8 Q. Toxicological journals? If so, do you
9 remember the name of any of them that they subscribe
10 to?

11 A. Haskell got subscriptions when I was there
12 in 1973 to some toxicological journals. The only
13 one I can remember the name of it is the Journal of
14 Pharmacology Applied Toxicology. I don't know if
15 there were others or not.

16 Q. Are you board certified in any medical
17 specialties?

18 A. In occupational medicine.

19 Q. Do you get a journal, do you belong to any
20 societies that send out publications on occupational
21 medicine?

22 A. Yes. The American College of Occupational
23 and Environmental Medicine which has the Journal of
24 Occupational Medicine as its journal.

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1 Q. Do you receive any chest disease journals?

2 A. No, I don't.

3 Q. Do you know if over the years any of the
4 various doctors that DuPont has had retained either
5 full-time or as plant physicians have been chest
6 specialists?

7 A. I don't know.

8 MR. RION: Why don't we change
9 transcripts now? We'll go to -- let me make the
10 record clear. We are now going to conclude the
11 deposition of Dr. Karrh taken under Rule 30 (b) 6 of
12 the West Virginia Rules of Civil Procedure. We're
13 going to on this same date in fact as soon as I
14 finish talking start another transcript of Dr. Karrh
15 in all other capacities other than his capacity as
16 the designated DuPont under rule 30 (b) 6.

17 As long as everybody is talking about
18 not waiving things I'm not by creating separate
19 transcripts, I am certainly not waiving any
20 arguments that I might make at any point that any
21 statement in either transcript is an admission based
22 on the doctor's position with DuPont rather than his
23 designation under Rule 30 (b) 6. And let's start
24 with the other transcript now.

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(The deposition was concluded at
approximately 2:23 p.m.)

The foregoing deposition is true and
correct to the best of my knowledge.


BRUCE W. KARRH, M.D.

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C E R T I F I C A T E

STATE OF PENNSYLVANIA :

:

COUNTY OF DELAWARE :

I, Judith B. Thorpe, a Notary Public within and for the County and State aforesaid, do hereby certify that the foregoing deposition of BRUCE W. KARRH, M.D. was taken before me, pursuant to notice, at the time and place indicated; that said deponent was by me duly sworn to tell the truth, the whole truth, and nothing but the truth; that the testimony of said deponent was correctly recorded in machine shorthand by me and thereafter transcribed under my supervision with computer-aided transcription; that the deposition is a true record of the testimony given by the deponent; and that I am neither of counsel nor kin to any party in said action, nor interested in the outcome thereof.

WITNESS my hand and official seal this 9th day of May, A.D., 1992.

JUDITH B. THORPE
Notary Public-Reporter

CORBETT & ASSOCIATES