

1 A No. Sometimes I testified one or two cases
2 in a year, sometimes I don't.

3 Q Well, I think -- do you recall testifying to
4 that effect in the testimony that Ms. Hines and myself
5 took of you on April 25th of this year?

6 A When you say testify, do you mean court
7 or --

8 Q Or deposition.

9 A Okay. Including deposition, I will say
10 probably a couple of cases at least a year.

11 Q And that would date back, you think, mid
12 1980s?

13 A Probably less though in the beginning of the
14 mid 1980s.

15 Q Well, do you recall maybe even a few cases
16 every year for all of those years?

17 A Maybe a few cases. I don't remember.

18 Q And would you also agree that you have
19 testified in a few brake lung cancer cases every year
20 since about the mid 1980s?

21 Again, I am including deposition and trial