In The Matter Of:

Nevada Power Company v.
Monsanto Company, et al.

John H. Craddock
March 19, 1993

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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA
NEVADA POWER COMPANY,)
Plaintiff,)
-vs-) # CV-89-555-LDG (LRL)
MONSANTO COMPANY, GENERAL)
ELECTRIC CORPORATION, et al.,)
Defendants.)

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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA
NEVADA POWER COMPANY,)
Plaintiff,)
-vs-) # CV-89-555-LDG (LRL)
MONSANTO COMPANY, GENERAL)
ELECTRIC CORPORATION, et al.,)
Defendants.)

DISCOVERY DEPOSITION OF WITNESS, to be used in an action pending in the District Court of the United States, for the District of Nevada, wherein NEVADA POWER COMPANY is Plaintiff, and MONSANTO COMPANY, et al. are Defendants, pursuant to Notice, under the provisions of Rule 26 of the Rules of Civil Procedure, taken on March 19, 1993, at the law offices of Messrs. Husch & Eppenberger, 100 North Broadway, St. Louis, Missouri, before John T. Concannon, a Notary Public within and for the State of Missouri.

APPEARANCES

The Plaintiff was represented by Mr. Ralph A. Bradley, of the law firm of Bradley & Merrell, c/o Jones, Jones, Close & Brown, 300 South Fourth Street, Ste. 700, Las Vegas, Nevada, 89101.

The Defendant, Monsanto Company, was represented by Mr. Bruce A. Featherstone, of the law firm of Kirkland & Ellis, 1999 Broadway, Ste. 4000, Denver Colorado, 80202.

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JOHN H. CRADDOCK

a witness of lawful age, being first duly sworn to tell the truth, the whole truth, and nothing but the truth, deposes and says, on behalf of the Plaintiff, as follows:

DIRECT EXAMINATION

QUESTIONS BY MR. BRADLEY:

Dr. Craddock, we are now going to take your Federal Rule of Civil Procedure 30B-6 deposition. As I understand it, you're here in response to a notice of taking deposition of Defendant, Monsanto, regarding the information contained on Attachment A.

MR. FEATHERSTONE: Go off the record. (Whereupon, a discussion was held between Counsel, off the record.)

Q: (By Mr. Bradley) Dr. Craddock, we just completed your personal deposition, correct?

A: Correct.

Q: And I'm now going to show you Attachment, excuse me, a document that's entitled Attachment A, and it's my understanding that you have been designated by Monsanto as the person to respond to a Federal Rule of Civil Procedure 30B-6 notice regarding the contents of what is listed on that exhibit; is that correct?

A: That's correct.

MR. FEATHERSTONE: Let me clarify this. First

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of all, he is one of the persons who will respond to this. We have a time frame with this one, the same which we did with the earlier one, for Dr. Craddock. He will be responding from 1980 until he retired in January of 19 - January 29th, or whatever the date was, 1993. Bill Papageorge will address it for other periods of time.

MR. BRADLEY: All right.

MR. FEATHERSTONE: Would you mark this as Exhibit A?

MR. BRADLEY: I'm going to mark it as Exhibit One.

MR. FEATHERSTONE: Fine. (Whereupon, the reporter marked Craddock Deposition Exhibit Number One, for identification.)

Q: (By Mr. Bradley) Dr. Craddock, when was the — Let me start all over again. You have a Doctoral degree; is that correct?

A: That's correct.

Q: And when did you receive your Doctorate?

A: 1961.

Q: Okay. Where did you receive it?

A: Vanderbilt University.

Q: And in what area?

A: Inorganic chemistry.

Q: What is organic chemistry?

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A: Organic chemistry is the study of molecules comprised primarily of carbon atoms. My degree was in inorganic chemistry.

Q: What is inorganic chemistry?

A: Inorganic chemistry is chemistry primarily of mostly non-carbon atoms.

Q: Following completion of your doctorate degree, where did you work?

A: M.W. Kellogg Company in New York City.

Q: How long did you work for them?

A: From 1961 to 1965.

Q: What work did you do for them?

A: I was in their corporate research department. Research chemist, research specialist.

Q: What were you researching while at M.W. Kellogg Company?

A: I was studying exploratory chemistry of precious metals as a liquid phase catalyst for petrochemical reactions.

MR. FEATHERSTONE: Let's go off the record. (Whereupon, a conversation was held between Counsel, off the record.)

Q: (By Mr. Bradley) What did you did following your work at M.B. Kellogg Company?

A: I was employed by Monsanto Company.

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Q: And the work that you did at M.W. Kellogg Company, did that involve any products containing polychlorinated biphenyls?

A: No.

Q: When did you begin your work with Monsanto Company?

A: 1965.

Q: What work did you do with Monsanto in 1965?

A: I was in the Central Research Department as a research chemist, or research specialist.

Q: What kind of work were you doing when you began in 1965 with Monsanto?

A: I was doing exploratory catalytic reactions of precious metals for synthesis with petrochemicals.

Q: Did that work involve polychlorinated biphenyls?

A: Only as a tool in the laboratory, as a high temperature heating bath.

Q: Was there a PCB bath that you used as part of your work with Monsanto in the 1965 to 1969 time frame?

A: Yes.

Q: Would you explain that?

A: There are high temperature heating baths, commonly referred to as oil baths - although PCBs were not an oil by the classical definition. This is an efficient

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heat transfer medium to uniformly heat a glass reaction flask which you're carrying out an exploratory chemical reaction in. Which means a transfer of heat to a exploratory reaction without using an open flame.

Q: I believe you testified in your personal deposition that you did not physically come in contact with the hot PCB mixture?

A: Not deliberately, no.

Q: All right. And when you worked with the PCBs in the lab as a research specialist, you used a fume hood?

A: That's correct.

Q: As you described in your personal deposition?

A: That's correct.

Q: What did do you do next at Monsanto?

A: In my career at Central Research, I was a senior chemist, research specialist, research group leader. Stayed in the Central Research Department until roughly the 1971 time frame, either managing or doing exploratory research.

Q: With precious metals?

A: Precious metals catalysts, yes.

Q: What job did you then have in 1971?

A: Then I became a supervisor of commercial development.

Q: What did you do as a commercial, or supervisor

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of commercial development?

A: My function was to transfer successful research projects to commercialization in one of the operating units of the company.

Q: And did any of those research projects involve products containing PCBs?

A: No.

Q: What did you do next?

A: After my job as a commercial development supervisor in the hydrocarbons and polymers division, I transferred to the Monsanto Industrial Chemicals Company as a manager of commercial development in the Food and Fine Chemicals Division, primarily dealing with food chemicals and food preservatives.

Q: What year was that?

A: Roughly, 74. 1974 time frame.

Q: Were you working with PCB products in that position?

A: No.

Q: What job in Monsanto did you have next?

A: In 1977, I moved into the environmental operations, newly formed environmental operations department of The Monsanto Industrial Chemicals Company.

MR. BRADLEY: Would you read the answer back. (Whereupon, the reporter propounded the previous question.)

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Q: (By Mr. Bradley) In that job, did you have contact with Monsanto products containing polychlorinated biphenyls?

A: Yes.

Q: Okay. And did you have responsibility for Monsanto products containing polychlorinated biphenyls in that job?

A: Yes.

Q: What products containing PCBs did you have responsibilities for?

A: In that job, I was responsible for plant compliance with regulations which were promulgated under the Toxic Substances Control Act. All of our plant operations had large amounts of electrical equipment which primarily contained PCBs as a dilectric fluid component of the electric power distribution equipment.

Q: How long did you have that job?

A: Until 1980.

Q: What were your job responsibilities in 1980?

A: In 1980, I became the corporate focal point for PCB issues, answering PCB questions, monitoring PCB regulations, providing corporate responses to regulatory agencies' inquiries or notices published in the Federal Register; answering customer questions and calls and so forth.

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Q: How long did you have that job?

A: Until my retirement.

Q: And you retired in January of 1993?

A: That's correct.

Q: And who held the job before you?

THE WITNESS: The job that I had in 1980?

MR. BRADLEY: Yes.

A: The job, as it was structured, didn't exist in that format before 1980.

Q: (By Mr. Bradley) All right. In 1980, were you Manager of Product and Environmental Safety?

A: Yes, I think that was the title.

Q: What did you do to prepare for the job that you had in 1977?

THE WITNESS: In 1977?

MR. FEATHERSTONE: May I have an objection to this line of inquiry on the grounds that it's beyond the scope?

MR. BRADLEY: Yes.

MR. FEATHERSTONE: Okay. Specifically, I mean beyond the scope of the 30B-6 notice for which this witness is tendered at this time.

MR. BRADLEY: Yes.

MR. FEATHERSTONE: Go ahead.

THE WITNESS: Okay. Where are we, back in

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1977, 1980?

MR. BRADLEY: Yes, 1977.

A: In 1977, I gathered information relative to the new environmental regulations that were being promulgated, primarily those under the Toxic Substances Control Act, and read information relating to the new rules and regulations, requirements. Primarily, those dealing with TSCA.

Q: What did you review to prepare you for your expanded job responsibilities in 1980?

A: 1980, I —

MR. FEATHERSTONE: Same objection to this line of questioning?

MR. BRADLEY: Right. Go ahead.

MR. FEATHERSTONE: That means it's a continuing objection. He gave it to me. You may answer.

A: In 1980, I collected information which summarized Monsanto's known information about PCBs and PCB issues, and this information included a summary report that was reported to Senator Eckhart's committee, summarized the history of Monsanto's PCB activities - sales, manufacture; summarized health effects and so forth.

Q: The same material that you indicated in your personal deposition that you reviewed?

A: Yes. And there were a couple of other

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documents that I indicated there also.

Q: Right.

A: Okay.

Q: In 1980, did Monsanto give any warnings or representations regarding the actual or potential hazards of PCBs that Monsanto contends were given to Nevada Power Company, or to any other person or entity such as, but not limited to, trade associations? Okay.

MR. FEATHERSTONE: Object to the form.

MR. BRADLEY: What's wrong with the form?

MR. FEATHERSTONE: It's compound. It has legal conclusory language.

MR. BRADLEY: Fine. Let me re-ask it then. I was trying to do it in a simplified manner, and I'll do it in a more careful manner.

Q: (By Mr. Bradley) Did Monsanto give any warnings to Nevada Power Company in 1980 or thereafter regarding the actual or potential hazards of PCBs?

A: I don't specifically recall Nevada Power.

Q: Did Monsanto give any warnings or representations regarding the actual or potential hazards of PCBs in 1980 and thereafter to any trade associations for electric utility companies?

A: Yes.

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[25] **Q:** And who did Monsanto give those warnings and

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[1] representations to, which trade associations?

[2] **A:** Monsanto made the information available on PCB [3] health effects and warnings to the Edison Electric [4] Institute - specifically, the Edison Electric [5] Institute/USWAG committee, which dealt with PCBs; the [6] National Rural Electric Cooperative Association; the [7] American Public Power Institute. I think that's all.

[8] **Q:** And you testified in your personal deposition [9] about the information that Monsanto made available?

[10] **A:** Yes.

[11] **Q:** To those associations?

[12] **A:** Yes.

[13] **Q:** And if I asked you those same questions in [14] this deposition, would you give the same answers that you [15] gave in your personal deposition?

[16] **MR. FEATHERSTONE:** Off the record. [17] (Whereupon, a discussion was held between Counsel, off the [18] record.)

[19] **Q:** (By Mr. Bradley) And if I asked you the same [20] questions regarding what information Monsanto gave to those [21] trade associations in this deposition as I asked in your [22] personal deposition, would your answer be the same in this [23] 30B-6 deposition?

[24] **A:** Yes.

[25] **Q:** I now want to ask you some more questions

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[1] about what Monsanto communicated to CMA.

[2] **A:** Okay.

[3] **Q:** Did Monsanto communicate to CMA that in 1955, [4] it knew that there was a need to give warnings about the [5] toxicity of PCBs, which had been repeatedly demonstrated?

[6] **MR. FEATHERSTONE:** Before you answer that [7] question, may I have a continuing objection? Beyond the [8] scope, communications to CMA?

[9] **MR. BRADLEY:** Yes.

[10] **MR. FEATHERSTONE:** Okay. Starts now.

[11] **THE WITNESS:** What's the question again now? [12] (Whereupon, the reporter propounded the previous question.)

[13] **MR. FEATHERSTONE:** Object to the form.

[14] **A:** I don't know if Monsanto specifically [15] delivered that information to CMA in that form or in that [16] time frame.

[17] **Q:** (By Mr. Bradley) Do you know whether CMA [18] reported to any trade associations or to this consensus [19] group that in 1955, Monsanto knew there was a need to give [20] warnings about the toxicity of PCBs?

[21] **A:** I know that they did not report that Monsanto [22] did anything specifically, did not report any specific [23] information attributed to Monsanto.

[24] **Q:** Did Monsanto report to CMA, or to any trade [25] association whose members included electric utility

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[1] companies, that Monsanto knew in 1955 that production [2] workers manufacturing PCBs experienced Chloracne, gastric [3] troubles and liver troubles?

[4] **A:** I don't think Monsanto reported that to CMA in [5] that form, no.

[6] **Q:** And did Monsanto report that information to [7] any trade association whose members included electric [8] utility companies?

[9] **MR. FEATHERSTONE:** Object to the form.

[10] **A:** In 1980, I don't think Monsanto reported that [11] in that context, no.

[12] **Q:** (By Mr. Bradley) Did Monsanto report to any [13] trade association whose members included electric utility [14] companies, or to CMA, that it knew in late 1959 that a skin [15] disease called Chloracne can be an indication of a more [16] serious systemic injury if exposure to PCBs was allowed to [17] continue?

[18] **A:** Again, I'm not versed on what "systemic [19] injury" is, but Monsanto did not report health effects at [20] those time frames in those manners, no. In 1980.

[21] **Q:** Or between 1980 and 1993; is that correct?

[22] **MR. FEATHERSTONE:** Well, now what's the [23] question?

[24] **MR. BRADLEY:** Well, he said that Monsanto [25] didn't relay that information in that form in 1980.

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[1] **A:** Right. In 1980 — 1980 to 1983, Monsanto [2] didn't relate that we knew at some date that a specific [3] allegation was made. We did not report that in that [4] format, no.

[5] **Q:** (By Mr. Bradley) From 1950 to 1993?

[6] **A:** To my knowledge, we did not.

[7] **Q:** Did Monsanto report to any trade association [8] whose members included electric utility companies that it [9] knew in 1966 that a Swedish researcher had found PCBs in [10] the hair of his wife and five month old girl?

[11] **A:** I don't believe Monsanto reported it in that [12] form on those dates, that time frame, no.

[13] **Q:** Did Monsanto report to any trade association [14] that it knew in late 1966 that a Swedish researcher had [15] determined his five month old daughter had PCBs in her hair [16] and that she had probably gotten the PCBs via her mother's [17] milk?

[18] **A:** In the 1980 to 1983 time frame? I don't think [19] they reported that in that time frame, no.

[20] **MR. BRADLEY:** For all these questions, I'm [21] referring to the period between 1980 and 1993, okay? [22] Because that's the period you have designated as a 30B-6 [23] deponent.

[24] **Q:** (By Mr. Bradley) Did Monsanto report to any [25] trade association whose members included electrical utility

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[1] companies that Monsanto knew in 1970 of Congressional [2] action to limit or ban the use of PCBs?

[3] **A:** No, it did not.

[4] **MR. FEATHERSTONE:** You're covering with this [5] witness the time period 1980 to 1993; is that correct, Mr. [6] Bradley?

[7] **MR. BRADLEY:** Yes. All of my questions have [8] to do with that time period.

[9] **MR. FEATHERSTONE:** All right.

[10] **Q:** (By Mr. Bradley) And you indicated that you [11] aren't familiar with the phrase "systemic poisoning." In [12] part, that's because you're not a medical doctor; is that [13] correct?

[14] **A:** That's correct.

[15] **Q:** You're not a toxicologist?

[16] **A:** No, I'm not.

[17] **Q:** Not an epidemiologist?

[18] **A:** No.

[19] **MR. BRADLEY:** That's all that I have.

[20] **MR. FEATHERSTONE:** Okay. No questions.

[21]

[22]

[23]

[24]

[25]

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M X 2 JOHN H. CRADDOCK

Subscribed and sworn to before me this __ day of _____, A.D., 19____.

Notary Public

Notary Public within and for the State of Missouri.

MY COMMISSION EXPIRES THE _____ DAY OF _____, A.D., 19____.

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STATE OF MISSOURI)
) SS
COUNTY OF ST. LOUIS)

I, John T. Concannon, a Notary Public within and for the State of Missouri, duly commissioned, qualified and

authorized to administer oaths and to take and certify to depositions, do hereby certify that pursuant to Notice in the civil cause now pending and undetermined in the District Court of the United States, within and for the District of Nevada, entitled NEVADA POWER COMPANY Plaintiff, -vs- MONSANTO COMPANY, et al., Defendants, to be used in the trial of said cause in said Court, I was attended at the law offices of Messrs. Husch & Eppenberger, 100 N. Broadway, Suite 1300, in the City of St. Louis, State of Missouri, by Ralph A. Bradley, attorney for the Plaintiff; by Bruce A. Featherstone, attorney for the Defendant, Monsanto Company; and by JOHN H. CRADDOCK, the witness, in said office on March 19, 1993.

The said witness, JOHN H. CRODDOCK, being of sound mind and being by me first carefully examined and duly cautioned and sworn to testify the truth, the whole truth and nothing but the truth in the case aforesaid, thereupon testified as is shown in the foregoing transcript, said testimony being by me reported in shorthand and caused to be transcribed into typewriting, and that the foregoing pages correctly set out the testimony of the aforementioned

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witness, JOHN H. CRADDOCK, together with the questions propounded by counsel and the remarks and objections of counsel thereto, and is in all respects a full, true and complete transcript of the questions propounded to and the answers given by said witness; and that said testimony, so transcribed, was subscribed to by the witness on the __ day of _____, A. D., 1993.

I FURTHER CERTIFY that I am not of counsel nor attorney for any of the parties to said suit, nor related, nor interested in any of the parties or their attorneys.

WITNESS MY HAND and Notarial Seal, given this __ day of __, A. D., 1993, at St. Louis, Missouri.

MY COMMISSION EXPIRES SEPTEMBER 12, 1994

JOHN T. CONCANNON,
Notary Public, within and
for the State of Missouri

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April 18, 1993

Bruce A. Featherstone, Esq.
Kirkland & Ellis
1999 Broadway - Ste. 4000
Denver, Colorado 80202

Re: Nevada Power Company -v-
Monsanto Company, et al.

Dear Mr. Featherstone:

This letter, incorporated as the last page of Mr. Craddock's deposition, taken on March 19, 1993, will serve as notice to you that his testimony is now ready for reading and signing of same. You will recall you indicated a preference for him reading his deposition, rather than waiving signature.

Enclosed please find the original signature page of Mr. Craddock's deposition, along with an eratta sheet. Please have Mr. Weber read and sign his deposition and return the original signature page to me. I will then return the signature page to the original transcript, and notify Mr. Bradley of any corrections the witness may have made.

Thank you for your cooperation in this regard.

Sincerely,
JOHN T. CONCANNON
Shorthand Reporter
Concannon & Jaeger
General Court Reporters
705 Olive Street - Ste. 604
St. Louis, Missouri 63101

JTC:md

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