

1 Q Doctor, we have talked about longshoreman
2 with other witnesses, but could you explain to the
3 jury exactly what a longshoreman is, what your
4 understanding of it is?

5 MS. HINES: Objection, Your Honor.

6 THE COURT: Overruled. If he knows.

7 A A longshoreman is someone who works on the
8 docks during the period of time that Mr. Wood was
9 working there, I guess this was during World War II,
10 and I know that there was a lot of loading and
11 unloading of cargo that would have occurred onto ships
12 at that time.

13 Q You have had occasion during your career as
14 an oncologist to review various oncology books,
15 correct?

16 A Yes.

17 Q And you rely upon those in your practice?

18 A Yes.

19 Q Okay. Do general standard oncology
20 textbooks refer to the occupational longshoreman?

21 A Yes.