

1 about as of the date of the publication which is June
2 of 1986. Is that acceptable.

3 A Is that acceptable. It is to me.

4 Q You understand what I'm saying then. When
5 this document was published in June of 1986 when I
6 asked you the question if the statement is factually
7 accurate, what I'm saying was it factually accurate in
8 June of 1986. Do you understand?

9 A Sure.

10 MR. LANKFORD: For further clarification, are
11 you saying in terms of, because each one has a cite
12 after it, factually accurate in terms of its synopsis or
13 interpretation of the studies or simply true at the
14 time?

15 BY MR. RUCKDESCHEL:

16 Q I'm asking whether the statement itself is
17 factually accurate. Not whether it is an accurate
18 quotation of a study but whether it is in fact a
19 factually accurate statement.

20 JUDGE KLINE: You're asking whether or not that
21 statement was true at the time it was made --

22 MR. RUCKDESCHEL: That's correct.

23 JUDGE KLINE: From a scientific point of view.

24 MR. RUCKDESCHEL: That's correct.

25 THE WITNESS: Now, Your Honor, this is the