

1 that your office provided her; right?

2 A Correct.

3 MR. CALFO: And I just want to thank you for
4 your service and the work you do with your patients,
5 Doctor. Thank you.

6 THE COURT: Anything from Imerys Talc America?

7 MR. MASAITIS: No additional questions from
8 Imerys.

9 THE COURT: Any redirect?

10 MR. STUEMKE: No, Your Honor.

11 THE COURT: You may step down, Dr. Cameron.
12 Thank you for coming. Thank you for your testimony.

13 Are we going to be returning to Dr. Longo?

14 MR. STUEMKE: Yes. Dr. Longo should be in the
15 hallway.

16

17 WILLIAM E. LONGO,

18 called by the Plaintiffs, having been previously duly sworn,
19 resumed the witness stand and testified further as follows:

20

21 CROSS-EXAMINATION (Resumed)

22 BY MR. BENOFF:

23 Q Sir, before we left, you had offered your
24 opinion that the federal counting rules define asbestos,
25 and that's where I'd like to pick up.

26 I'd like to do that by asking you about
27 someone named Dr. Langer. Now, you believe he's a --

28 A I'm sorry, he's --

1 that's another one that was purchased by Simon
2 Greenstone given to you off the shelf; right?

3 A Yes.

4 Q And again, you found no asbestos; right?

5 A That's correct.

6 Q Another one, M66511-001, that's off the shelf
7 from Simon Greenstone and given to you to test; right?

8 A That's correct.

9 Q And on that one you found no asbestos; right?

10 A That's correct.

11 Q Every single other sample that's talked about
12 in your report, before it even went to the lawyers, was
13 in somebody else's home or office or somewhere that you
14 don't know; right?

15 A That's correct.

16 Q So every single sample that you tested in your
17 report that came off a shelf to you, every single sample
18 of Johnson & Johnson that came in that format had no
19 asbestos; right?

20 A Where it says "off the shelf," that's correct.

21 Q And you didn't -- you talked about it today,
22 but you didn't put in your report that you had actually
23 gone out and bought a bottle of Johnson & Johnson and
24 that you had tested that one also for asbestos; right?

25 A That's correct.

26 Q But you left that out of your report entirely;
27 correct?

28 A That's correct.