



1 TO ME WITH THIS. IF YOU GOOGLE MY NAME, THE  
2 DEFAMATION COMES UP ON THE FIRST PAGE. MY FRIENDS  
3 HAVE ASKED ME ABOUT IT, AND I'VE HAD TO EXPLAIN.

4 MY PROFESSIONAL COLLEAGUES, I WAS JUST AT A  
5 NATIONAL MEETING OF AMERICAN INDUSTRIAL HYGIENISTS  
6 ASSOCIATION, AND I HAD TO ANSWER QUESTIONS ABOUT  
7 THIS DEFAMATION OVER AND OVER AGAIN. AND EVEN  
8 CLIENTS I'VE HAD TO ASSEMBLE A HISTORY, WHICH IS  
9 NEARLY AN INCH THICK, AND USE THAT TO EXPLAIN TO  
10 CLIENTS WHAT THIS IS ABOUT. THAT INCLUDES SCHOOL 09:56AM  
11 DISTRICTS, INDIVIDUALS, COMPANIES, I'VE HAD TO GIVE  
12 THAT HISTORY TO ATTORNEYS THAT I WORK WITH WHEN I  
13 TESTIFY SO THAT THEY'RE AWARE OF WHAT MIGHT COME UP  
14 IN COURT. AND WITH HER CONTINUED REPUBLICATION, IT  
15 SEEMS TO BE ACCELERATING, NOT DECELERATING.

16 MR. SCHEUER: THANK YOU.

17 THE COURT: DOES THAT CONCLUDE YOUR EXAMINATION?

18 MR. SCHEUER: IT DOES.

19 THE COURT: MAY I ASK -- WELL, I MAY. I MAKE  
20 THE RULES. 09:57AM

21 MR. SCHEUER: YES, YOU MAY.

22

23

#### EXAMINATION

24 BY THE COURT:

25 Q ONE OF THE THINGS THAT I'M ASKING MYSELF,  
26 AND MAYBE YOU CAN HELP ME WITH THIS, IS THE EXTENT  
27 TO WHICH MR. KELMAN HAS ANY CREDIBILITY IN YOUR  
28 PROFESSION. DOES SHE HAVE ANY CREDIBILITY, AND IF

1 SO WHY?

2 A I WOULD HAVE TO SAY THAT HER CREDIBILITY  
3 WITHIN THE GENERAL PROFESSION IS LESS THAN LIMITED.  
4 BUT EACH TIME SHE BRINGS THIS UP AGAIN, IT GOES TO  
5 INDIVIDUALS WHO DON'T KNOW.

6 Q INDIVIDUALS IN YOUR WORLD?

7 A YES. IN MY PROFESSION, MEANING  
8 TOXICOLOGISTS AND INDUSTRIAL HYGIENISTS, IN THE  
9 COURTROOM. THERE'S BEEN NUMEROUS TIMES WHERE  
10 INDIVIDUAL OPPOSING ATTORNEYS HAVE ATTEMPTED TO 09:58AM  
11 BRING IT IN.

12 Q JUST AS AN ASIDE, LET ME SAY IF IT WERE  
13 EVER IN MY COURT AN APPROPRIATE MOTION MADE TO ME IN  
14 ADVANCE WOULD MAKE SURE THAT NEVER CAME UP. WE HAD  
15 A JURY REACH THE CONCLUSION THAT THAT'S NOT TRUE.  
16 THAT'S THE END OF IT. THAT'S WHY WE ARE HERE. SO  
17 IT WOULD NEVER AND SHOULD NEVER COME UP IN A COURT  
18 OF LAW. THE ATTORNEYS ARE PREPARED AND COMPETENT.  
19 BUT GO AHEAD.

20 I'M JUST TRYING TO MEASURE WHAT KIND OF AN 09:58AM  
21 IMPACT MRS. KRAMER WOULD HAVE ON PROFESSIONAL PEOPLE  
22 IN YOUR WORLD?

23 A YOUR HONOR, THAT'S A FAIR QUESTION. AND I  
24 CAN'T GIVE YOU A QUANTITATIVE NUMBER BECAUSE I NEVER  
25 KNOW THE PEOPLE WHO DON'T CALL ME. PARTICULARLY IN  
26 MY PROFESSION, I DO A SIGNIFICANT AMOUNT OF REPORTS,  
27 AND I DON'T KNOW WHICH ATTORNEYS DON'T CALL ME.

28 I DO KNOW THAT THE ONES THAT I DO WORK WITH

1 ARE EVEN NOW EXTREMELY CONCERNED ABOUT THIS; THAT IT  
2 COULD GET IN FRONT OF A JURY. SO IT'S NOT A MOOT  
3 POINT, EVEN THOUGH IT SEEMS LIKE IT SHOULD BE.

4 AND I ALSO -- I GET A LOT OF QUESTIONS BACK  
5 FROM MY FRIENDS. I'VE HAD TO TALK TO BOTH MY  
6 IMMEDIATE FAMILY AND MY EXTENDED FAMILY, AND THEY  
7 DON'T UNDERSTAND BECAUSE -- AND, IN FACT, IT'S MY  
8 UNDERSTANDING, TOO, PEOPLE WHO ARE NOT ATTORNEYS,  
9 HOW IT IS THAT SHE CAN CONTINUE TO REPEAT THIS  
10 LIBEL, WHICH IS AS YOU SAID WHAT A JURY FOUND, 10:00AM  
11 SEEMINGLY ENDLESSLY AND WITHOUT CONSEQUENCE. AND  
12 I'VE HAD THAT QUESTION OFTEN, AND NOT BEING AN  
13 ATTORNEY, I CAN'T ANSWER IT.

14 Q WELL, THERE'S BEEN SOME CONSEQUENCE. SHE'S  
15 BEEN CHARGED WITH A SIGNIFICANT AMOUNT OF MONEY FOR  
16 ATTORNEY'S FEES AND SPENT SOME TIME IN A PLACE THAT  
17 SHE DIDN'T PARTICULARLY ENJOY.

18 BUT IN ANY EVENT, I THANK YOU FOR THE  
19 ANSWER. THAT'S WHAT I NEEDED TO HEAR.

20 MR. SCHEUER: IF I MAY, I FORGOT TO TESTIFY TO 10:00AM  
21 ONE THING THAT I NEED TO TESTIFY TO AND THAT IS THE  
22 AMOUNT OF ATTORNEY'S FEES THAT I HAVE INCURRED SINCE  
23 THE LAST CONTEMPT PROCEEDING JUST INVOLVED IN THIS  
24 CONTEMPT PROCEEDING.

25 THE COURT: LIMIT IT TO THE CONTEMPT, NOT THE  
26 INJUNCTION.

27 MR. SCHEUER: JUST LIMITED TO THE CONTEMPT, I'VE  
28 SPENT AT LEAST 28 HOURS PREPARING THE PAPERWORK AND