

1 for the defense in mold litigation; correct?

2 A On occasion, yes.

3 Q And he's done that since 1999; correct?

4 A I don't know.

10 :57:28 5 Q And Dr. Saxon was listed as the third
6 author of the ACOEM paper; correct?

7 A Correct.

8 Q Okay. And was he also a co-author of the
9 Manhattan Institute paper?

10 :57:56 10 A Yes.

11 Q Was he compensated for his involvement in
12 the Manhattan Institute paper?

13 A He was not.

14 Q Why not?

10 :58:08 15 A We contacted Dr. Saxon about the
16 immunology parts that were being written for the
17 Manhattan Institute; he had substantial suggestions
18 and suggested wording changes and different
19 examples that we were using, and we felt that that
10 :58:32 20 was a substantive contribution to the paper, and he
21 should be listed as an author.

22 Q But his -- any interactions with him or
23 any services by him, none of that appears on any of
24 the invoices that were sent to the Manhattan

10 :58:48 25 Institute report; correct?