

The following is an excerpt from the deposition of Dr. Andrew Saxon, LAS VEGAS, NV, 28th day of November, 2006, in the case of Hake vs. Coleman Homes.

The entire testimony is available upon request.

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107

1 (Prior to the commencement of the deposition,
2 all of the parties present agreed to waive statements by
3 the court reporter pursuant to Rule 30(b)(4) of NRCP.)

4

5 Thereupon--

6 ANDREW SAXON, M.D.,

7 was called as a witness, and having been first duly

8 sworn, was examined and testified as follows:

9

10 EXAMINATION

11 BY MR. DUFFY:

160

1 Q. And is your testimony here going to be, as it

2 has in the past, that in terms of yourself, you're an

3 employee of UCLA, correct?

4 A. I am.

5 Q. The moneys that the defense lawyers will be
6 writing their checks for for your time for review and
7 other matters will go to UCLA, correct?

8 A. No.

9 Q. It goes to the Regents?

10 A. No.

11 Q. Where does it go to?

12 A. Me.

13 Q. Personally?

14 A. Yes. I retired effectively September 1, and
15 I'm back at UCLA as an employee doing teaching, research
16 and patient care, but since I'm officially emeritus, now
17 the money is actually made out to me.

18 Q. How long has that been the case?

19 A. September 1.

20 Q. So this is one of the very first cases under
21 this new arrangement?

22 A. That's right.

23 Q. Prior to that, you essentially got about 43
24 cents of every dollar, correct?

25 A. That's what -- you remembered what my wife

1 told me.

2 Q. Yes, I did. And that was in terms of

3 consulting as well as review of records?

4 A. Medical/legal work. All aspects of it were

5 thrown in one pot at UCLA.

6 Q. In terms of mold cases and litigation, you've

7 always testified on the defense side?

8 A. Testified, yes.

9 Q. And --

10 A. I'm talking about depositions and trials

11 testimony.

12 Q. So am I. And also hearings like in the

13 CHKGorman case was on the defense side?

14 A. Yes.

15 Q. And testifying in mold cases on the defense

16 side started sometime in 1999. Is that approximately

17 correct, according to your testimony?

18 A. It sounds about right.

19 Q. And from 1999 until your retirement where we
20 have this different arrangement of compensation for your
21 time, do you have a sense as to what the total gross
22 dollars to UCLA were?

23 A. I wouldn't have a clue, really, no.

24 Q. And despite that answer, do you know what your
25 43 percent was?

162

1 A. No.

2 Q. Okay.

3 A. The answer is no.

4 Q. All right. To determine that, how would one
5 go about that?

6 A. Well, one would have to get very detailed
7 monthly and quarterly payment statements from the
8 university because it's all folded in one check. It's
9 not evident, and that's all electronically deposited in
10 the bank, and then one would have to speak to my wife
11 because -- I'm not joking; I probably told you before --
12 she deals with all the money in our family. So that

13 money goes into the bank directly.