

1 through and listed the things. Have you seen
2 firsthand the effects of inhaled mycotoxins?

3 MR. SCHEUER: Has he seen? I'm sorry,
4 could I have the question --

12 :11:28 5 THE WITNESS: Yes.

6 BY MR. BANDLOW:

7 Q Where have you seen firsthand the effects
8 from inhaled mycotoxins?

9 A The presence of mycotoxins on particles is
12 :11:38 10 ubiquitous. Right now I'm looking at the effects
11 of inhaled mycotoxins at extremely low
12 concentrations.

13 Q You're not a medical doctor; correct?

14 A I think I -- we covered that in the first
12 :11:52 15 deposition.

16 Q And you don't examine human beings for
17 biological effects of mycotoxins; correct?

18 A Not independent of a physician, no.

19 Q You're not a veterinarian either; correct?

12 :12:08 20 A That's correct.

21 Q Okay. So have you ever studied the effect
22 of inhaled mycotoxins in animals?

23 A Of course.

24 Q But studied other people's research?

12 :12:20 25 A Studied is studied.

1 Q But not actually done studies on the
2 animals themselves; correct?

3 MR. SCHEUER: Could you rephrase that
4 question maybe. Counsel, I think your question
12 :12:36 5 maybe just can be rephrased.

6 BY MR. BANDLOW:

7 Q Do you understand the concept of bench
8 research?

9 A You're trying to use a verb -- I don't
12 :12:46 10 know what that means to you.

11 Q To me, it means not looking at other
12 people's research but actually doing the studies on
13 the animals themselves. Have you ever done that to
14 a understand the effects of mycotoxins on animals?

12 :13:00 15 A You never do -- first of all, you never do
16 a study on animals without looking at the body of
17 literature before you do the study, otherwise you
18 can't formulate your question. If you're asking me
19 have I ever experimented on animals with
12 :13:16 20 mycotoxins, the answer is, no. I answered that at
21 the previous deposition and nor would there be a
22 reason to for these kinds of effects.

23 Q Did you provide expert opinion services
24 for the U.S. Department of Justice in 2006 in a
12 :13:48 25 mold claim involving a military family, the