

IN THE SUPREME COURT OF THE STATE OF NEVADA

SANDRA CAMACHO; AND ANTHONY  
CAMACHO,

Petitioners,

vs.

THE EIGHTH JUDICIAL DISTRICT COURT OF  
THE STATE OF NEVADA, IN AND FOR THE  
COUNTY OF CLARK; AND THE HONORABLE  
NADIA KRALL, DISTRICT JUDGE,

Respondents,

and

PHILIP MORRIS USA, INC., a foreign  
corporation; R.J. REYNOLDS TOBACCO  
COMPANY, a foreign corporation, individually,  
and as successor-by-merger to LORILLARD  
TOBACCO COMPANY and as successor-in-  
interest to the United States tobacco business of  
BROWN & WILLIAMSON TOBACCO  
CORPORATION, which is the successor-by-  
merger to THE AMERICAN TOBACCO  
COMPANY; LIGGETT GROUP, LLC., a foreign  
corporation; and ASM NATIONWIDE  
CORPORATION d/b/a SILVERADO SMOKES &  
CIGARS, a domestic corporation; LV SINGHS  
NC. d/b/a SMOKES & VAPORS, a domestic  
corporation,

Real Parties in Interest.

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*PETITIONERS' APPENDIX  
VOLUME 10 (Nos. 1591-1801)*

Sean K. Claggett, Esq.  
Nevada Bar No. 8407  
Micah S. Echols, Esq.  
Nevada Bar No. 8437  
Matthew S. Granda, Esq.  
Nevada Bar No. 12753  
David P. Snyder, Esq.  
Nevada Bar No. 15333  
CLAGGETT & SYKES LAW FIRM  
4101 Meadows Ln., Ste. 100  
Las Vegas, Nevada 89107  
(702) 655-2346 – Telephone  
[micah@claggettlaw.com](mailto:micah@claggettlaw.com)  
[david@claggettlaw.com](mailto:david@claggettlaw.com)

Fan Li, Esq.  
Nevada Bar No. 15771  
KELLEY | UUSTAL  
500 N. Federal Hwy., Ste. 200  
Fort Lauderdale, Florida 33301  
(954) 522-6601 – Telephone  
[klw@kulaw.com](mailto:klw@kulaw.com)

*Attorneys for Petitioners, Sandra Camacho and Anthony Camacho*

1 DISTRICT COURT

2 CLARK COUNTY, NEVADA

3 SANDRA CAMACHO, individually, and )  
 4 ANTHONY CAMACHO, individually, )

5 vs. Plaintiffs, )

)Case No.  
 )A-19-807650-C

6 PHILIP MORRIS USA INC., a foreign )  
 corporation; R. J. REYNOLDS TOBACCO )  
 7 COMPANY, a foreign corporation, )  
 individually, and as successor-by- )  
 8 merger to LORILLARD TOBACCO COMPANY )  
 and as successor-in-interest to the )  
 9 United States tobacco business of )  
 BROWN & WILLIAMSON TOBACCO )  
 10 CORPORATION, which is the )  
 successor-by-merger to THE AMERICAN )  
 11 TOBACCO COMPANY; LIGGETT GROUP, )  
 LLC, a foreign corporation; ASM )  
 12 NATIONWIDE CORPORATION d/b/a )  
 SILVERADO SMOKES & CIGARS, a )  
 13 domestic corporation; and LV SINGHS )  
 INC. d/b/a SMOKES & VAPORS, a )  
 14 domestic corporation; DOES I-X; and )  
 ROE BUSINESS ENTITIES XI-XX, )  
 15 inclusive, )  
 Defendants. )  
 16 \_\_\_\_\_ )

17 VIDEOTAPED DEPOSITION OF SANDRA CAMACHO

18 VOLUME I

19 Taken on Tuesday, November 2, 2021

20 Through a translator

21 By a Certified Stenographer and Legal Videographer

22 At 9:05 a.m.

23 At 531 Morning Mauve Avenue

24 Las Vegas, Nevada

25 Reported by: HOLLY LARSEN, CCR 680, CA CSR 12170

1 APPEARANCES:

2 For the Plaintiffs:

3 KELLEY UUSTAL  
4 BY: KIMBERLY L. WALD, ESQ.  
5 500 North Federal Highway, Suite 200  
Fort Lauderdale, Florida 33301  
954.522.6601

6  
7 For Philip Morris USA Inc.:

8 SHOOK, HARDY & BACON L.L.P.  
9 BY: JENNIFER KENYON, ESQ.  
BY: BRIAN A. JACKSON, ESQ.  
2555 Grand Boulevard  
Kansas City, Missouri 64108  
10 816.474.6550

11  
12 For Liggett Group, LLC:

13 KASOWITZ BENSON TORRES LLC  
14 BY: KELLY ANNE LUTHER, ESQ.  
1441 Brickell Avenue, Suite 1420  
Miami, Florida 33131  
786.587.1045

15  
16 For R. J. Reynolds Tobacco Company:

17 KING & SPALDING  
18 BY: URSULA M. HENNINGER, ESQ.  
300 South Tryon Street, Suite 1700  
Charlotte, North Carolina 28202  
19 704.503.2631

20  
21 Also Present:

22 GIAN SAPIENZA, Legal Videographer  
23 DWAYNE PARRETTE, Translator/Reader  
ANTHONY CAMACHO

24

25

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9 NUMBER PAGE

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11 Exhibit 2 Plaintiff's Responses to 21  
12 Defendant ASM Nationwide  
13 Corporation's First  
14 Interrogatories to  
Plaintiff Sandra Camacho

14 Exhibit 3 Plaintiff's Amended 22  
15 Responses to Defendant ASM  
16 Nationwide Corporation's  
17 First Interrogatories to  
Plaintiff Sandra Camacho

17 Exhibit 4 Plaintiff's Second Amended 27  
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1 P R O C E E D I N G S

2

3 THE VIDEOGRAPHER: This begins the  
4 video-recorded deposition of Sandra Camacho taken on  
5 Tuesday, November 2, 2021, at 9:05 a.m. This  
6 deposition is being held at 531 Morning Mauve  
7 Avenue, Las Vegas, Nevada, and is entitled Sandra  
8 and Anthony Camacho versus Philip Morris USA Inc.,  
9 et al., in the District Court, Clark County, Nevada.  
10 Case Number A-19-807650-C.

11 My name is Gian Sapienza with Certified  
12 Legal Videography. The court reporter is Holly  
13 Larsen with Oasis Reporting Services.

14 Will the attorneys please state your name  
15 and affiliation for the record.

16 MS. WALD: Good morning. Kimberly Wald  
17 from Kelley Uustal on behalf of the plaintiff.

18 MS. KENYON: Jennifer Kenyon on behalf of  
19 Philip Morris USA.

20 MR. JACKSON: Brian Jackson on behalf of  
21 Philip Morris USA.

22 MS. LUTHER: Kelly Luther on behalf of  
23 Liggett Group, LLC.

24 MS. HENNINGER: Ursula Henninger on behalf  
25 of R. J. Reynolds Tobacco Company.

1 THE VIDEOGRAPHER: Thank you. The court  
2 reporter will now administer the oath.

3 (The translator was sworn.)

4 Whereupon,

5 SANDRA CAMACHO,  
6 having been first duly sworn to testify to the  
7 truth, was examined, and testified as follows:

8  
9 MS. HENNINGER: Before we start, Ursula  
10 Henninger on behalf of R. J. Reynolds Tobacco  
11 Company. I am here only because currently  
12 R. J. Reynolds is not a party to this action.  
13 However, the judge has indicated that she intends to  
14 sign an order reversing a prior decision dismissing  
15 R. J. Reynolds. That order has not been entered,  
16 but given her statement that she intends to sign it,  
17 we are here to preserve our rights. But we're not  
18 waiving anything here.

19

20 EXAMINATION

21 BY MS. KENYON:

22 Q. Good morning, Mrs. Camacho. I introduced  
23 myself off the record. I'm Jennifer Kenyon, and I'm  
24 here on behalf of Philip Morris. At the volume I'm  
25 speaking right now, can you hear me okay?

1 MS. WALD: Maybe slow down a little.

2 BY MS. KENYON:

3 Q. Before we get started, I'm going to go over  
4 a couple of the ground rules with things we  
5 discussed with your attorney, sort of let you know  
6 how today's going to go.

7 During the course of scheduling this  
8 deposition, the parties had conversations about  
9 safeguards and precautions that we're all going to  
10 take today. As part of that, all the attorneys and  
11 all individuals here are wearing a mask given the  
12 ongoing COVID-19 pandemic. In order to make sure  
13 you're as comfortable as possible, you are not  
14 wearing a mask, and we're currently located in your  
15 home. That was at your request; is that right?

16 A. Yes.

17 MS. WALD: You can use the pen and point.

18 BY MS. KENYON:

19 Q. So Ms. Wald informed us that you're not  
20 able to speak. So to make it a little bit easier  
21 for you, we have two sheets of paper that are in  
22 front of you that have various responses that you  
23 can give to the questions that I ask you.

24 Those responses are "yes," "no," "correct,"  
25 "incorrect," "I don't know," "I do not remember," "I

1 do not understand the question," and "please repeat  
2 the question." Do you see those?

3 A. (Indicating.)

4 MS. WALD: It's okay. It's okay. Take  
5 your time.

6 BY MS. KENYON:

7 Q. Are you okay?

8 A. (Inaudible response.)

9 Q. So to respond to my questions, if you could  
10 just point -- if you can, point to one of these  
11 eight responses, and then we've got our interpreter  
12 here, and he will read your responses on the record.  
13 Does that make sense?

14 A. Yes.

15 Q. If there's ever a question that you can't  
16 answer with one of these eight responses, you have a  
17 white board in front of you. So to the extent that  
18 you need to, you can write out your answers, and our  
19 interpreter over here will also read that response  
20 on the record. Does that sound good?

21 A. Yes.

22 Q. You're doing great. It's entirely up to  
23 you how you want to respond. If you can use these  
24 answers, that's great. If you need to take some  
25 more time to write it, that's great. Just let us



1 know. Sound good? Does that sound good?

2 A. Yes.

3 Q. I also understand you have some difficulty  
4 hearing?

5 A. Yes.

6 Q. So I just want to make clear for the record  
7 and for the video that if I'm speaking to you  
8 loudly, it's just so that you can hear me. I'm not  
9 trying to yell at you. Do you understand that?

10 A. Yes.

11 Q. And if you ever cannot hear me, just let me  
12 know. Sound good?

13 A. Yes.

14 Q. Ms. Wald also represented to us that  
15 sometimes you have trouble seeing things clearly.  
16 Sometimes you have trouble seeing things?

17 A. Yes.

18 Q. If you cannot see or read something that  
19 I've handed to you, just let me know, and we'll  
20 handle it. Okay?

21 A. Yes.

22 Q. So you ready to go?

23 A. Yes.

24 Q. So, in addition, I'm just going to go over  
25 a few additional ground rules of how today's going

1 to go. Sound good?

2 A. Yes.

3 Q. If you could, just let me -- wait for me to  
4 finish my question before you answer. Okay? Sound  
5 good?

6 A. Yes.

7 Q. If you don't understand a question, just  
8 let me know. There's about four responses over here  
9 if you don't understand something. Just let me  
10 know. Okay?

11 A. Yes.

12 Q. I will do everything I can to make you feel  
13 as comfortable as possible. So if you need to take  
14 a break at any point, whether it's 10 minutes from  
15 now, 20 minutes from now, just let me know, and  
16 we'll take a break. Okay? Sound good?

17 A. Yes.

18 Q. You understand that you are under oath  
19 today?

20 A. Yes.

21 Q. You understand that you have sworn to tell  
22 the truth today?

23 A. Yes.

24 Q. Have you taken any medications today?

25 A. Yes.

1 Q. Any medications that would affect your  
2 ability to testify truthfully and honestly?

3 A. No.

4 Q. Is there anything that might affect your  
5 ability to understand and answer my questions today?

6 A. No.

7 Q. Is there anything that prevents you from  
8 giving accurate testimony today?

9 A. No.

10 Q. Your full name is Sandra Marie Camacho;  
11 right?

12 A. Yes.

13 Q. Have you ever gone by any other names?

14 A. No.

15 Q. What did you do to get ready for your  
16 deposition today?

17 A. I do not know.

18 Q. Did you look at any documents before your  
19 deposition today? Any records? If you don't  
20 understand my question, just --

21 A. I do not understand the question.

22 Q. Did you look -- do you recall responding to  
23 discovery in this case? Answering questions about  
24 yourself?

25 A. I do not remember.

1 MS. WALD: To short-circuit it, she looked  
2 at her depo notice, and she looked at her responses  
3 to interrogatories.

4 BY MS. KENYON:

5 Q. Did you meet with your attorneys before  
6 your deposition today?

7 A. Yes.

8 Q. And you met with Ms. Wald? You've met with  
9 Ms. Wald; is that right?

10 A. (Indicating.)

11 Q. Sorry. Is that --

12 A. Yes.

13 MS. WALD: I don't think she knows my last  
14 name.

15 BY MS. KENYON:

16 Q. You met with Kim?

17 A. Yes.

18 Q. Sorry. When is the first time that you  
19 talked to Kim?

20 A. I don't remember. I do not remember.

21 Q. Did you meet with Kim yesterday?

22 A. Yes.

23 Q. How long did you meet with her?

24 A. I think almost three hours.

25 MS. WALD: Remember to hold it up.

1 THE WITNESS: (Witness complies.)

2 MS. WALD: That's it. Good job. You can  
3 put it down.

4 BY MS. KENYON:

5 Q. If you could just erase it after you --  
6 perfect. So that there's no confusion.

7 Did you talk with your husband, Anthony  
8 Camacho, about your deposition?

9 A. Yes.

10 Q. What did you discuss?

11 A. That it's today.

12 Q. Did you talk to your daughter Laura about  
13 your deposition?

14 A. That it's today.

15 Q. Did you discuss anything else with your  
16 daughter?

17 MS. WALD: Remember, erase.

18 THE WITNESS: Yes.

19 BY MS. KENYON:

20 Q. What else did you discuss with your  
21 daughter?

22 A. Court date.

23 Q. When you say "court date," do you mean  
24 the --

25 MS. WALD: Wait for a question. You can

1     erase the top.  It's okay.

2     BY MS. KENYON:

3           Q.    You're doing great.  Is there something  
4    else you discussed with your daughter Laura that you  
5    were just about to write?  You talked to her?  Is  
6    that "yes"?

7           A.    I do not remember.

8           Q.    Did you tell your daughter Laura something  
9    about your deposition or about this case?

10           MS. WALD:  Object to form.

11           You can answer.  You can answer.

12    BY MS. KENYON:

13           Q.    I'll ask a little bit different question.  
14    Have you talked to your daughter Laura about this  
15    case?

16           MS. WALD:  Remember, point.

17           THE WITNESS:  Yes.

18    BY MS. KENYON:

19           Q.    What have you discussed with your daughter  
20    Laura?

21           A.    What I'm going through.

22           Q.    If you could just erase your answer.

23           A.    (Witness complies.)

24           Q.    When you say what you're "going through,"  
25    do you mean -- what do you mean?

1 A. Talking with my lawyer.

2 Q. Have you talked -- if you could just erase  
3 that.

4 A. (Witness complies.)

5 Q. Are you doing okay?

6 A. Yes.

7 Q. Did you talk to your son John about your  
8 deposition?

9 MS. WALD: Remember you can point.

10 THE WITNESS: No.

11 BY MS. KENYON:

12 Q. Have you talked to your son John about this  
13 case?

14 A. No.

15 Q. Any reason that you haven't talked to him  
16 about your case?

17 A. We have not talked. Don't know why.  
18 Almost seven month.

19 Q. So you have not talked to your son John in  
20 almost seven months?

21 A. Yes.

22 Q. But you don't know why you haven't talked  
23 to him?

24 A. No.

25 Q. Did something happen between you two?

1           A.    No.  They got very nervous when I had to  
2   suction.  Walk out of room.

3           Q.    Who is "they"?

4           A.    My son and daughter-in-law.

5           Q.    What is your daughter-in-law's name?

6           A.    Jeanine, J-e-a-n-i-n-e.

7           Q.    Were you visiting them, or were they  
8   visiting you?

9           A.    Here.

10          Q.    So they were visiting you here at your  
11   home; is that right?

12          A.    Three and a half years when this happen.

13          Q.    So the incident where they were visiting  
14   your home and they got nervous when you had to  
15   suction, that was three and a half years ago; is  
16   that right?

17          A.    Yes.  And on computer.

18          Q.    Three and a half years ago, is that the  
19   last time that you saw your son in person?

20          A.    Yes.

21                MS. WALD:  It's okay.  Do you want to take  
22   a short break?

23                THE WITNESS:  (Inaudible response.)

24                MS. WALD:  Are you cold?

25                THE WITNESS:  (Inaudible response.)



1 BY MS. KENYON:

2 Q. Are you doing okay? I know some of this  
3 can be really difficult to talk about, so I  
4 understand and I appreciate it. You're still able  
5 to hear me okay?

6 A. Yes.

7 Q. Did you talk to anyone else about your  
8 deposition?

9 A. My family knows.

10 Q. Anyone else besides Laura and your husband?

11 A. (Inaudible response.)

12 MS. WALD: Remember, point.

13 BY MS. KENYON:

14 Q. Anyone else besides Laura or your husband?

15 A. My family knows.

16 Q. Who else in your family knows?

17 A. Two sisters.

18 Q. If you want to go ahead and erase that.

19 A. (Witness complies.)

20 Q. Is that Linda Blake?

21 A. Yes.

22 Q. And is it Donna Kinsella?

23 A. Yes.

24 Q. When did you talk to Linda?

25 A. Over one week. Mad over politics.

1 Q. Who was mad over politics?

2 A. Linda.

3 Q. Did you and Linda get in an argument over  
4 politics?

5 A. Disagree.

6 Q. During that conversation, did you discuss  
7 this lawsuit with Linda?

8 A. No.

9 Q. Did you tell her you were having your  
10 deposition taken?

11 A. I do not remember.

12 Q. But does she know about this case?

13 A. Yes.

14 Q. What did you tell her?

15 A. I do not remember. I do not remember.

16 Q. You said you also talked to your sister  
17 Donna about this case; is that right?

18 A. Yes. We don't talk too much about it.

19 Q. When is the last time you talked to Donna?

20 A. Yesterday.

21 Q. How did you talk to her?

22 A. Computer.

23 MS. WALD: Fix your night gown. Pull this  
24 up. You look beautiful.

25 ///

1 BY MS. KENYON:

2 Q. Have you talked to anyone else about this  
3 case?

4 A. I do not remember. Jan, girlfriend of 60  
5 years, told her not everything.

6 Q. Jan is one of your friends for over 60  
7 years?

8 A. Yes.

9 Q. What is her last name?

10 A. I do not remember.

11 Q. Do you know where Jan lives?

12 A. No. I do not remember.

13 Q. You said that you told her not everything.  
14 What did you tell her?

15 A. Just lawsuit file.

16 Q. So the only thing you told your friend Jan  
17 is that you had filed a lawsuit; is that right?

18 A. Yes.

19 Q. When did you have that conversation with  
20 her?

21 A. I do not remember.

22 Q. Are you doing okay?

23 A. (Inaudible response.)

24 (Exhibit 1 marked.)

25 ///

1 BY MS. KENYON:

2 Q. I'm handing you what I've marked as Defense  
3 Exhibit 1.

4 MS. WALD: Is it just the depo notice?

5 MS. KENYON: Yeah. I have a copy.

6 MS. WALD: I don't need a copy.

7 BY MS. KENYON:

8 Q. Can you take a look at that?

9 A. Yes.

10 Q. Exhibit 1 is the notice setting your  
11 deposition. Have you seen this document before?

12 A. Yes.

13 Q. If you could turn to page 3, do you see at  
14 the top where it says "Schedule A" at the top up  
15 there?

16 MS. WALD: Right here (indicating).

17 THE WITNESS: I don't have them.

18 BY MS. KENYON:

19 Q. Just so I understand, Schedule A asks for  
20 certain documents. Do you understand that?

21 MS. WALD: Point to the answer.

22 THE WITNESS: Yes.

23 BY MS. KENYON:

24 Q. Did you read these document requests?

25 MS. WALD: Point to the answer.

1 THE WITNESS: Yes.

2 MS. WALD: You can put this down.

3 BY MS. KENYON:

4 Q. And you don't have any documents?

5 A. No.

6 Q. Did you look for documents?

7 A. I don't have any.

8 Q. Did you look for any at some point? Did  
9 you look for documents at some point?

10 A. I do not remember.

11 Q. Did you -- were you going to write  
12 something?

13 A. (Inaudible response.)

14 Q. Did you bring anything besides the  
15 photographs to your deposition today?

16 MS. WALD: And the bags.

17 MS. KENYON: Okay.

18 BY MS. KENYON:

19 Q. So you've got -- can you tell me what  
20 exactly you brought?

21 A. Duffel bags, lantern, knife, pictures.

22 Q. And we will get photographs of the duffel  
23 bags, lanterns, and knife off the record, and I'll  
24 ask you some questions later about those items.

25 Okay? Sound good?

1 A. (Inaudible response.)

2 Q. Yes, you can erase that.

3 (Exhibit 2 marked.)

4 BY MS. KENYON:

5 Q. I'm handing you what I've marked as Defense  
6 Exhibit 2. These are your initial answers to  
7 interrogatories that were served December 9, 2020.  
8 Do you see at the top where it says "December 9,  
9 2020"? Do you see that? Do you see at the top  
10 where it says "December 9th"?

11 A. Yes.

12 Q. If you would, can you flip -- can you turn  
13 to the very last page?

14 A. (Witness complies.)

15 Q. Do you see at the top where it reads  
16 "Declaration. I, Sandra Camacho, declare under  
17 penalty of perjury" --

18 A. Yes.

19 Q. -- "that the foregoing is true and  
20 correct," executed on the 6th of December 2020? Do  
21 you see that right here? Do you see that?

22 A. Yes.

23 Q. Is that your signature on that page?

24 A. Yes.

25 Q. How did you prepare your responses to your

1 initial interrogatories? Do you remember answering  
2 questions about your address, your employment,  
3 things like that?

4 A. Yes.

5 Q. How did you get that information together?

6 A. I know it.

7 Q. Did anyone help you respond to these  
8 questions? Did anyone help you answer the  
9 questions?

10 A. No.

11 Q. Do you remember whether you looked through  
12 your answers before they were filed -- before they  
13 were served back in 2020 to make sure that they were  
14 accurate?

15 A. I do not remember.

16 Q. Have you reviewed your initial responses  
17 recently?

18 A. I do not remember.

19 MS. WALD: Your coffee is there if you want  
20 it. It's hot. It's right here.

21 (Exhibit 3 marked.)

22 BY MS. KENYON:

23 Q. Now I'm handing you what I've marked as  
24 Defense Exhibit 3. These are your amended  
25 responses, which were served on March 12, 2020. Do

1 you see that at the top? Do you see that?

2 A. (Inaudible response.)

3 Q. Do you see that at the top? Can you point  
4 to --

5 A. Yes.

6 Q. Same thing, if you could flip to the very  
7 back page, very last one. It's right there.

8 A. (Witness complies.)

9 Q. Yep. Do you see where it says  
10 "Declaration. I, Sandra Camacho, declare under  
11 penalty of perjury that the foregoing is true and  
12 correct," executed on the 9th of March 2021?

13 A. Yes.

14 Q. Is that your signature on that page?

15 A. Yes.

16 Q. Did you review your responses -- did you  
17 review your amended responses before they were  
18 served in March of 2020? Did you look at them  
19 before these were served in March of 2020?

20 MS. WALD: Object to form.

21 You can answer. Remember, point.

22 THE WITNESS: Please repeat the question.

23 BY MS. KENYON:

24 Q. So these are your amended responses from  
25 March of 2020. Do you understand that?



1 A. Yes.

2 Q. So, for example, I'll just look at Number

3 1. Can you turn to page 3.

4 A. (Witness complies.)

5 Q. Do you see how Interrogatory Number 1 -- it

6 reads "Response," and then it lists your name, date

7 of birth. That response was your original answer.

8 Do you understand that?

9 A. Yes.

10 Q. Then underneath that it reads "Amended

11 Response." Do you see that?

12 MS. WALD: Point to an answer.

13 THE WITNESS: Yes.

14 BY MS. KENYON:

15 Q. So your amended response provides

16 additional information. Do you see that? Some

17 additional addresses. Do you see that? So

18 underneath the amended response you list a number of

19 addresses now. Do you see that?

20 A. Yes.

21 Q. Where did you get the information in the

22 amended response that you did not have in your

23 initial response?

24 A. I do not remember.

25 Q. Did anyone --

1 A. That's true.

2 Q. You said "that's true," and you're pointing  
3 at your amended response; is that right?

4 A. Yes.

5 Q. And all I'm trying to understand is where  
6 you got the information in the amended response that  
7 you didn't have when you initially responded to your  
8 discovery.

9 MS. WALD: Form.

10 THE WITNESS: I do not remember.

11 BY MS. KENYON:

12 Q. Did anyone help you prepare your amended  
13 responses?

14 A. Yes.

15 Q. Who?

16 A. (Indicating.)

17 Q. You can write it. Can you erase that?

18 A. (Witness complies.)

19 My lawyer.

20 Q. Your lawyer helped you prepare your amended  
21 responses?

22 A. Yes.

23 MS. KENYON: Let's take a break. We'll go  
24 off the record.

25 MS. WALD: We're going to stay on the

1 video.

2 MR. JACKSON: No.

3 MS. WALD: We're staying on the video.

4 MR. JACKSON: This is not testimony. We're  
5 not staying on the video.

6 MS. WALD: We're staying on the video. I  
7 cross-noticed this as a video deposition.

8 MR. JACKSON: This isn't testimony. We're  
9 taking a break.

10 MS. WALD: You can object to it if you need  
11 to later. We're staying on the video.

12 MS. KENYON: We'll object now that we  
13 object to staying on the video right now during a  
14 break.

15 (Off the stenographic record.)

16 THE VIDEOGRAPHER: Off record at 9:52.

17 (A break was taken.)

18 THE VIDEOGRAPHER: Time is 10:03. We are  
19 back on the record.

20 BY MS. KENYON:

21 Q. Ms. Camacho, we're back. Are you ready to  
22 go?

23 A. Yes.

24 Q. Are you feeling okay?

25 A. Yes.

1 (Exhibit 4 marked.)

2 BY MS. KENYON:

3 Q. I'm handing you what I've marked as Defense  
4 Exhibit Number 4. Do you see at the top where it  
5 says, "Served November 1, 2021"? Do you see that at  
6 the top?

7 A. Yes.

8 Q. And your second amended responses to  
9 defendants' interrogatories were just served  
10 yesterday. Do you understand that?

11 A. I do not understand the question.

12 Q. So November 1, 2021, that was yesterday?  
13 Do you understand that?

14 A. Yes.

15 Q. And then at the top of these, it reads  
16 "Electronically served 11/1/2021." Do you see that  
17 at the top?

18 A. Yes.

19 Q. And then about three-fourths of the way  
20 down it reads, "Plaintiffs' Second Amended Responses  
21 to Defendants" -- do you see that at the bottom down  
22 there, "Plaintiffs' Second Amended Responses"?

23 A. Yes.

24 Q. So I'm just going to look at one of these  
25 as an example. If you could turn to page 7, do you

1 see Interrogatory Number 6? Do you see that?

2 A. Yes.

3 Q. And then right underneath Interrogatory  
4 Number 6, it's asking for information about your  
5 employers.

6 A. Yes.

7 Q. And you have your responses. Do you see  
8 that response, "Employer IHOP"? Do you see that?

9 A. Yes.

10 Q. Then if you would turn to the next page,  
11 page 8, do you see where it says "Amended Response"?

12 A. Yes.

13 Q. And then underneath that at the bottom it  
14 reads, "Second Amended Response." Do you see that?

15 A. Yes.

16 Q. And under the second amended response, you  
17 added an additional employer, "employer, unknown  
18 beauty shop; address, unknown; job title,  
19 beautician." Do you see that?

20 A. Yes.

21 Q. So you added additional information to your  
22 second amended response?

23 A. Yes.

24 Q. Where did you get the additional  
25 information that you didn't have from your first two

1     interrogatory responses?

2           A.    I remember then.  Dawned on me.

3           Q.    Did anyone help you prepare your responses  
4   to -- let me rephrase that.

5                   Did anyone help you prepare your second  
6   amended responses?

7           A.    Yes.

8           Q.    Who?  If you can erase that and write it  
9   out.

10          A.    Please repeat the question.

11          Q.    Who helped you prepare your responses to  
12   the second -- who helped you prepare your second  
13   amended responses?

14          A.    My lawyer.

15          Q.    Is that Ms. Wald?

16          A.    Kim.

17          Q.    If you would take Exhibit Number 4 back and  
18   turn to the very last page again, page 23, do you  
19   see at the top where it says "Declaration"?

20          A.    Yes.

21          Q.    "I, Sandra Camacho, declare under penalty  
22   of perjury that the foregoing is true and correct.  
23   Executed on the 1st day of November, 2021."  Do you  
24   see that?

25          A.    Yes.

1 Q. Is that your signature?

2 A. Yes.

3 Q. I'm going to use these, your second amended  
4 responses, throughout your deposition just to kind  
5 of help move things along. Does that sound good?

6 A. Yes.

7 MS. WALD: You can hold on to them.

8 BY MS. KENYON:

9 Q. You understand that you've been asked to  
10 look for photographs in this case? Do you  
11 understand that you've been asked to look for  
12 photographs? For this case you were asked to look  
13 for photographs?

14 A. Please repeat the question slow.

15 Q. Do you understand that you have been asked  
16 to look for photographs in this case?

17 A. Yes.

18 Q. And did you try to find photographs?

19 A. Yes.

20 Q. Did you look for the photographs yourself?

21 A. Yes.

22 Q. Did anyone help you look for photographs?

23 A. Tony.

24 Q. That's your husband, Tony?

25 A. Yes.

1 Q. How did you decide which photographs to  
2 give to your attorneys?

3 A. To show that I smoked.

4 Q. Do you have other photographs of you not  
5 smoking?

6 MS. WALD: Form.

7 BY MS. KENYON:

8 Q. You can go ahead and answer. Do you have  
9 other photos of you not smoking?

10 A. Yes.

11 Q. Are those photos in your home? Are they  
12 here in your home?

13 A. Yes.

14 Q. Do you understand that you produced an  
15 initial batch of photos, like an initial set of  
16 photographs?

17 A. Please repeat the question.

18 Q. You need me to slow down?

19 A. (Inaudible response.)

20 Q. Sorry. Do you understand that you, through  
21 your attorney, produced an initial set of  
22 photographs?

23 A. Yes.

24 MS. KENYON: So I will mark those  
25 photographs as Composite Exhibit 5. Just for the



1 record, we have the originals here.

2 (Exhibit 5 marked.)

3 THE WITNESS: What I looked like. What I  
4 did look like.

5 BY MS. KENYON:

6 Q. Do you want to take a short break?

7 A. No.

8 MS. KENYON: These were the original ones;  
9 right?

10 MS. WALD: Yes, in the bag I believe. I  
11 know Brian took some too.

12 MS. KENYON: Yeah, I think he kept them  
13 separate.

14 MS. WALD: I think that they're separate.  
15 If there's a few that are off, we'll find out.

16 BY MS. KENYON:

17 Q. In the interest of time, I'm just going to  
18 go over a few of that initial set that were part of  
19 Composite Exhibit 5. Okay?

20 A. Yes.

21 Q. So the first one at the bottom, it says,  
22 CAMACHO 000002. I'll hand you that photo. Can you  
23 tell me who the four women in this photograph are?

24 A. Neighbor dead. Number 2, aunt dead -- two  
25 aunt dead.

1 Q. So just looking at it from I guess it would  
2 be your left, who is this woman on the far left? Is  
3 that the neighbor?

4 A. (Indicating.)

5 Q. So starting from the far right, that's your  
6 neighbor.

7 A. (Inaudible response.)

8 Q. Do you recall her name?

9 A. (Inaudible response.)

10 MS. WALD: Can you point?

11 BY MS. KENYON:

12 Q. Sorry. Can you point?

13 A. No.

14 Q. The second woman in on the right, is that  
15 an aunt?

16 A. Yes.

17 Q. And then the third woman in, is that you?

18 A. Yes.

19 Q. And then the woman on the far left of the  
20 photograph is another aunt?

21 A. Yes.

22 Q. And all three of the women in this  
23 photograph are deceased?

24 A. Yes.

25 Q. Were all three of these women -- did any of

1     these women smoke cigarettes?

2           A.     I do not remember.

3           Q.     Do you recall either of your aunts' names?

4           A.     No.

5           Q.     Do you recall how either of your aunts  
6     died?

7           A.     I do not remember.   I do not remember.

8           Q.     Do you know what year this photograph was  
9     taken?

10          A.     No.

11          Q.     Do you know where this photograph was  
12     taken?

13          A.     Maybe River Grove.

14          Q.     I'm going to hand you the photograph from  
15     Composite Exhibit 5 that reads at the bottom  
16     CAMACHO 00275.   Can you see that?

17                 MS. WALD:   What was the last Bates on the  
18     first one?   Was it just 02?

19                 MS. KENYON:   Yes.

20                 THE WITNESS:   Yes.

21     BY MS. KENYON:

22           Q.     Can you tell me who is in this photograph?

23           A.     No.   Girls I worked with.

24           Q.     And which woman are you in the photograph?

25           A.     (Indicating.)

1 Q. So the second in from the right; is that  
2 right?

3 A. Yes.

4 Q. Where was this photograph taken?

5 A. Denny's.

6 Q. When was the photograph taken?

7 A. I do not remember.

8 Q. Was smoking allowed in Denny's at that time  
9 when the photograph was taken?

10 A. Yes.

11 Q. Were you allowed to smoke inside Denny's  
12 while working there?

13 A. Yes. Back room.

14 Q. So when you were working at Denny's, you  
15 could smoke in the back room; is that right?

16 A. Yes.

17 Q. Was that during a break?

18 A. Yes. And if not busy, we went and smoked.

19 Q. You wouldn't smoke while you were actually  
20 waiting on customers, would you?

21 A. No.

22 Q. Were patrons -- were the people who came to  
23 the restaurant to eat, were they allowed to smoke  
24 inside the restaurant?

25 A. Yes.

1 Q. I'm handing you CAMACHO 002776, which is  
2 also part of Defense Exhibit 5. Can you see that  
3 photograph?

4 A. Yes.

5 Q. Who is in that photograph? Is that you in  
6 the photograph?

7 A. Yes.

8 Q. When was this photograph taken?

9 A. I do not remember.

10 Q. Where was this photograph taken?

11 A. Denny's.

12 Q. While you were working there as a waitress?

13 A. Yes.

14 Q. Is this the back room that you were just  
15 talking about?

16 A. Yes.

17 Q. Did you want to say something else?

18 A. Denny's.

19 Q. I'm handing you CAMACHO 002779, also part  
20 of Defense Exhibit 5. Do you see that photograph?

21 A. (Inaudible response.)

22 Q. Who's in this photograph? Who is that man?

23 A. My father.

24 Q. When was this photograph taken?

25 A. I do not remember.

1 Q. Where was the photograph taken?

2 A. I do not remember.

3 Q. He's smoking in the picture?

4 A. Yes.

5 Q. Do you know what brand he's smoking?

6 A. Lucky Strike.

7 Q. I apologize if -- do you know where this  
8 photograph was taken?

9 MS. WALD: Form.

10 BY MS. KENYON:

11 Q. Is that inside your family home, or where  
12 is that photograph taken?

13 A. I do not remember.

14 Q. The last one I'm going to ask you about  
15 right now is from Defense Exhibit 5, CAMACHO 002781.  
16 Is that you on the left?

17 A. Yes.

18 Q. Who is that gentleman on the right?

19 A. Husband.

20 Q. Is that Tony Camacho?

21 A. Yes.

22 Q. Do you know when this photograph was taken?

23 Ms. Wald just handed me the original of  
24 that photograph, and it looks like on the back --  
25 it's hard to read, but I think it says October 31,

1 1978. Do you see that?

2 A. Yes.

3 MS. WALD: October or February? Maybe  
4 October.

5 THE WITNESS: Dating.

6 BY MS. KENYON:

7 Q. So this photo was taken sometime in 1978  
8 when you and Mr. Camacho were dating; is that right?

9 A. Yes.

10 Q. Where was this photograph taken?

11 A. I do not remember.

12 Q. And it looks like there's a pack of  
13 cigarettes in your right hand. Do you know what  
14 brand that is?

15 MS. WALD: Here's the original if it's  
16 easier to look at.

17 THE WITNESS: L&M.

18 BY MS. KENYON:

19 Q. And then you also produced some new  
20 photographs yesterday, November 1st. Do you  
21 understand that?

22 A. Yes.

23 Q. Where did you find those new photographs?

24 A. (Indicating.)

25 MS. WALD: Write it down.

1 THE WITNESS: In cabinet. Lots of albums.

2 BY MS. KENYON:

3 Q. You're pointing. Is it a cabinet in the  
4 kitchen?

5 A. Yes.

6 Q. Did you go through all of the photo albums?

7 A. Yes.

8 Q. And then did you pick the photographs that  
9 you thought would be most helpful for your case?

10 MS. WALD: Object to form.

11 THE WITNESS: Please repeat the question.

12 BY MS. KENYON:

13 Q. Of the albums, the photos that you had, did  
14 you pick the photos that you thought would be most  
15 helpful for your case?

16 MS. WALD: Object to form.

17 THE WITNESS: I do not know.

18 BY MS. KENYON:

19 Q. How did you pick the photos that you gave  
20 to us?

21 A. I do not remember.

22 Q. So you don't know how you selected the  
23 photographs that you gave to us?

24 MS. WALD: Object to form.

25 THE WITNESS: I do not remember. I do not



1 know.

2 MR. JACKSON: Let's go ahead and go off the  
3 record.

4 THE VIDEOGRAPHER: The time is 10:35. We  
5 are going off the record.

6 (A break was taken.)

7 THE VIDEOGRAPHER: The time is 10:38. We  
8 are back on the record.

9 BY MS. KENYON:

10 Q. Are you ready to go, Mrs. Camacho?

11 A. Yes.

12 Q. Are you feeling okay?

13 A. Yes.

14 Q. We've looked at this. I'm going to hand  
15 you back Defense Exhibit Number 1. If you could  
16 turn to page 4. Before we broke, we were talking  
17 about some of the photographs you had in your house.  
18 So I want to ask you about some of our requests for  
19 photos. Okay? Sound good? I'm going to ask you  
20 about some photographs?

21 A. (Indicating.)

22 Q. Yeah, page 4. Exactly. Do you see that?  
23 You're on page 4?

24 A. Yes.

25 Q. So Number 16, "Any and all photographs,

1 negatives, films, videotapes, slides, and/or  
2 electronically or digitally recorded images that  
3 depict you after your diagnosis of the alleged  
4 smoking-related illnesses you claim in this lawsuit  
5 while at or during a social event, wedding ceremony,  
6 family outing, vacation, holiday event, and/or  
7 leisure activity."

8 Did I read that correctly? Do you see  
9 where I'm at? So this request is asking for  
10 photographs of you after your alleged injuries. Do  
11 you understand that? After your diagnosis? This  
12 one is asking for photographs of you after your  
13 diagnosis. Do you understand that?

14 A. I do not remember.

15 Q. So I'm just asking, do you have photographs  
16 of yourself after your diagnosis, after your cancer  
17 diagnosis?

18 A. I do not know.

19 Q. Number 17 asks for photographs of you and  
20 Anthony Camacho. Do you see Number 17? Do you have  
21 additional photographs of you and Anthony Camacho  
22 that --

23 A. (Indicating.)

24 Q. Hold on. Let me finish my question real  
25 quick.

1           Do you have additional photographs of you  
2   and Anthony Camacho that you have not produced in  
3   this case?

4           A.   After this (indicating)?

5           Q.   Just for the record, you're pointing to  
6   your throat. I'm actually asking if you have any  
7   additional photographs of you and Anthony Camacho at  
8   any point that you have not produced in this case.

9           A.   Yes.

10          Q.   Is there a reason that you have not  
11   produced those photographs?

12          A.   I do not know.

13          Q.   Have you reviewed any pictures of cigarette  
14   packs or cartons recently? Have you looked at any  
15   pictures of cigarette packs or cartons?

16          A.   No.

17          Q.   I'm switching gears. I'm just going to go  
18   through some of your background information. Sound  
19   good?

20          A.   Yes.

21          Q.   You were born on April 28, 1946?

22          A.   Yes.

23          Q.   In Chicago, Illinois?

24          A.   Yes.

25          Q.   And you grew up in the Chicago area?

1 A. River Grove.

2 Q. Is -- River Grove, is that a suburb of  
3 Chicago?

4 A. I do not know.

5 Q. So I'm going to hand you back Defense  
6 Exhibit 4. So if you would turn to page number 3,  
7 and can you take a look at your amended response to  
8 Interrogatory Number 1? Can you review that now?

9 A. (Indicating.)

10 Q. So on -- one page back, page 3. So your  
11 amended response here, can you just take a look at  
12 that and let me know when you're done. You're done  
13 reading?

14 A. Yes.

15 Q. Does your response to Interrogatory  
16 Number 3, your amended response -- does that  
17 accurately reflect your addresses over the years?

18 A. I do not understand the question.

19 Q. Sure. I'm just trying to figure out if  
20 everything in your amended response, if that's still  
21 accurate and we can use it going forward?

22 A. Yes.

23 Q. So the first address that you have listed,  
24 Hessington [sic] Street, River Grove, Illinois, who  
25 lived with you at that home? Was that your mom, dad,

1 and two sisters?

2 Sorry. I think the rest of your response  
3 is on the top of page 4. Right there.

4 MS. WALD: She's talking about this  
5 address, Hessington.

6 BY MS. KENYON:

7 Q. Was it your mom, dad, and two sisters that  
8 lived with you at that address, Hessington?

9 A. Yes.

10 Q. Did anyone else live with you at that  
11 address?

12 A. No.

13 Q. And then the next address you have listed  
14 is 8124 West Belmont Avenue. Do you see that? You  
15 wrote, "I moved there when I was about six years  
16 old." Do you understand?

17 A. I lived there both places. I lived there  
18 both places.

19 Q. So you lived at the Hessington Street  
20 address?

21 A. Yes.

22 Q. And you lived at the Belmont Avenue  
23 address?

24 A. Yes.

25 Q. Did anyone else besides your mom, dad, and

1 two sisters live with you at the Belmont address?

2 A. No.

3 Q. So I'm going to move on to a different  
4 address. So the O'Connor Drive address in River  
5 Grove, Illinois, do you see that right here?

6 A. Yes.

7 Q. You lived there from 1966 to about 1973; is  
8 that right?

9 A. Yes.

10 Q. Did anyone besides your mom, dad, and two  
11 sisters live with you at that address?

12 A. When I married Dominic, he moved in.

13 Q. Dominic, is that your first husband?

14 A. Yes.

15 Q. Did you marry him in 1966?

16 A. Yes.

17 Q. So in 1966 you moved out of your parents'  
18 home; is that right?

19 MS. WALD: Object to form.

20 BY MS. KENYON:

21 Q. So the O'Connor Drive address --

22 A. Dominic and I moved there from a  
23 one-bedroom.

24 Q. So you and Dominic moved from a one-bedroom  
25 to the O'Connor Drive address in 1966?

1 A. I do not remember.

2 Q. Do you know when you moved out of your  
3 parents' home?

4 A. When I got married.

5 Q. That's when you got married to Dominic?

6 A. Yes.

7 Q. Does it sound right that you and Dominic  
8 were married September 26, 1966?

9 A. Yes.

10 Q. When did you and Dominic get divorced?

11 A. I think 1970 or '71.

12 Q. What led to the divorce?

13 A. His abusive mother.

14 Q. Abusive towards you or Dominic?

15 A. Me. Hit me with shoe.

16 Q. Why did she hit you with a shoe?

17 A. I guess I wasn't good enough for her son.

18 Q. Is Dominic still living?

19 A. Yes.

20 Q. Do you ever talk to him?

21 A. Only if he is by my daughter and I happen  
22 to call there.

23 Q. Does he live in the Chicago area? Does he  
24 live in the Chicago area?

25 A. I do not know.

1 Q. Was he a smoker?

2 A. No.

3 Q. Did he ever smoke?

4 A. No.

5 Q. Did he ever discuss -- strike that.

6 Were you smoking when you were married to  
7 Dominic?

8 A. Yes.

9 Q. Did you ever -- did he ever ask you not to  
10 smoke?

11 A. No.

12 Q. Did you and Dominic ever discuss your  
13 smoking?

14 A. No.

15 Q. You said that you call your daughter. How  
16 do you communicate with her over the phone?

17 A. Computer.

18 Q. Do you type your answers into the computer  
19 and then it reads it?

20 A. Messenger.

21 Q. So is your daughter typing her answers back  
22 on the computer or is she using her voice?

23 A. Her voice. She reads my lips. If she  
24 can't make it out, then I write.

25 Q. I believe you said earlier you have



1 discussed this lawsuit with your daughter; is that  
2 right?

3 A. Yes.

4 Q. What did you discuss about this lawsuit  
5 with your daughter?

6 MS. WALD: Object to form. Asked and  
7 answered.

8 You can answer.

9 THE WITNESS: (Inaudible response.)

10 MS. WALD: You can answer.

11 BY MS. KENYON:

12 Q. What did you tell your daughter about the  
13 lawsuit?

14 A. (Inaudible response.)

15 Q. Are you saying everything?

16 A. (Inaudible response.)

17 Q. So you told your daughter everything about  
18 the lawsuit?

19 A. Yes.

20 MS. KENYON: We'll go off the record.

21 MS. WALD: We can go off the video.

22 THE VIDEOGRAPHER: The time is 11:00. We  
23 are going off the record.

24 (A break was taken.)

25 THE VIDEOGRAPHER: The time is 11:12. We

1 are back on the record.

2 BY MS. KENYON:

3 Q. Mrs. Camacho, are you ready to go?

4 A. Yes.

5 Q. Before we broke, we were -- before we took  
6 a break, we were discussing conversations you had  
7 with your daughter about this lawsuit. Do you  
8 understand?

9 A. Yes.

10 Q. And I believe you were trying to mouth or  
11 you did mouth that you discussed, quote, "everything  
12 about the lawsuit"; is that right?

13 A. Yes.

14 Q. So you've discussed everything about this  
15 lawsuit with your daughter Laura; right?

16 A. Yes.

17 Q. What was her reaction when you told her  
18 about the lawsuit?

19 A. She was glad I did.

20 Q. Glad you did what?

21 A. File a lawsuit.

22 Q. Does Laura live in this home with you?

23 A. No.

24 Q. Does she live in the Las Vegas area?

25 A. Yes.

1 Q. So we were going over the addresses on your  
2 second amended interrogatory responses. You wrote  
3 on the interrogatories that you moved out of the  
4 O'Connor Drive address in 1973. So did you continue  
5 to live at the O'Connor Drive address after your  
6 divorce from Dominic?

7 A. Yes.

8 Q. And then in 1973 you moved back into the  
9 8124 West Belmont Avenue address? That's what you  
10 stated at the bottom of page 3 in your second  
11 amended interrogatories. Bottom of page 3. You  
12 wrote, 8124 West Belmont Avenue, Chicago, Illinois,  
13 from about 1973 to 1976.

14 A. I do not remember.

15 Q. Who wrote this information that says you  
16 moved to the Belmont Avenue address in 1973?

17 MS. WALD: You can point to the answer.

18 THE WITNESS: I do not remember.

19 BY MS. KENYON:

20 Q. Is the Belmont Avenue address -- is that  
21 your parents' home? Was that your parents' home?

22 A. (Inaudible response.)

23 Q. The Belmont Avenue address, was that your  
24 parents' home?

25 A. It's still their home.

1 Q. So at some point after your divorce from  
2 Dominic, did you and your children move back in with  
3 your parents?

4 A. Yes.

5 Q. Based on your amended interrogatory  
6 responses, you moved out of the Belmont Avenue  
7 address in 1976. Does that sound right?

8 A. I do not remember.

9 Q. And then your amended response -- the next  
10 address where you lived was Arnold Street, River  
11 Grove, Illinois?

12 A. Yes.

13 Q. From 1976 to 1984. Does that sound right?

14 A. I do not remember dates.

15 Q. You don't remember dates. Is that what  
16 you're saying?

17 A. Yes.

18 Q. So who gave --

19 A. But I lived there.

20 Q. So are you saying that you lived at the  
21 Arnold Street address?

22 A. Yes.

23 Q. So who provided all of these dates in your  
24 interrogatory responses?

25 A. I do not remember.

1 Q. Who lived with you at the Arnold Street  
2 address?

3 A. I do not remember.

4 Q. The next address in your amended  
5 interrogatory responses is 2433 Clinton Street.

6 A. Yes.

7 Q. And someone wrote that you lived there from  
8 1984 until about 1990.

9 A. Yes.

10 Q. Do you know who lived with you at the  
11 Clinton Street address?

12 A. Yes.

13 Q. Who?

14 A. Husband, Tony.

15 Q. Did your children live with you at the  
16 Clinton Street address?

17 A. Yes.

18 Q. Do you know what year or when your daughter  
19 moved out of your home? At some point did Laura  
20 move out of your home?

21 A. Yes.

22 Q. When?

23 A. When she got married. We lived in Vegas.

24 Q. Did she get married before or after you  
25 moved to Vegas?

1 A. After.

2 Q. Did you move to Las Vegas in 1990?

3 A. Yes.

4 MS. KENYON: We're off the record. We'll  
5 take a break.

6 MS. WALD: You can keep the video on.

7 MS. KENYON: Off the record at 11:24.

8 (Off the stenographic record.)

9 THE VIDEOGRAPHER: The time is 11:26. We  
10 are going off the record.

11 (A break was taken.)

12 THE VIDEOGRAPHER: The time is 11:29. We  
13 are back on the record.

14 BY MS. KENYON:

15 Q. Are you feeling okay, Mrs. Camacho?

16 A. Yes.

17 Q. We were going over some of your prior  
18 addresses before the break. I believe we stopped at  
19 the Buckingham Estates address. I'll hand you back  
20 your amended response. Buckingham Estates, is that  
21 in Las Vegas?

22 A. Yes.

23 Q. Did your son and daughter both move with  
24 you to Las Vegas?

25 A. I do not remember.

1 Q. Is it that you don't remember whether your  
2 son moved to Las Vegas? You can either say correct,  
3 yes, no. Is it correct that you don't know whether  
4 your son moved with you to Vegas?

5 A. Correct.

6 Q. But your daughter did move with you to  
7 Vegas; is that right?

8 A. Yes.

9 Q. Did your husband, Anthony, live with you at  
10 the Buckingham Estates address?

11 A. Yes.

12 Q. Did anyone else live with you and your  
13 husband?

14 A. No.

15 Q. I should say you, your husband, and  
16 daughter. Did anyone else live with you?

17 A. No.

18 Q. And then based on your amended  
19 interrogatory responses, you moved to the 2485 West  
20 Wigwam Avenue address?

21 A. Yes.

22 Q. And then your amended response says that  
23 you moved there in about 1992 or 1993 and that you  
24 lived there until 1997 or 1998.

25 A. Yes.

1 Q. Did your daughter live with you at the West  
2 Wigwam address?

3 A. What year?

4 Q. Do you know what year your daughter moved  
5 out of your home?

6 A. I do not remember.

7 Q. Who lived with you at the West Wigwam  
8 address?

9 MS. WALD: You can clear the board first.

10 THE WITNESS: I do not remember. She moved  
11 out when she got married. Don't ask me year. I  
12 don't know.

13 BY MS. KENYON:

14 Q. You're doing great. I'm going back a long  
15 ways. So if you don't remember, that is totally --  
16 that's fine. Are you doing okay?

17 A. Yes.

18 Q. Are you okay to keep going?

19 A. Yes.

20 Q. The next address that we have from your  
21 amended response is 1166 Stormy Valley. Do you  
22 remember that address?

23 A. Yes.

24 Q. And in the amended responses it states you  
25 lived there about ten years.



1 A. Yes.

2 Q. Do you know who lived with you at that  
3 address?

4 A. Yes.

5 Q. Who?

6 A. Me and Tony.

7 Q. And then about 13 years ago you moved to  
8 your current home; is that right?

9 A. Yes.

10 Q. And your husband Tony lives here with you  
11 in your current home?

12 A. Yes.

13 Q. Has anyone else lived at this home with  
14 you?

15 A. No.

16 Q. Do you know any of your neighbors in your  
17 current home?

18 A. Just to say "hi."

19 Q. I'm going to go through some of your other  
20 family members now. Okay? Sound good?

21 A. Yes.

22 Q. Your father was John Mucci? Did I say that  
23 right?

24 A. (Indicating.)

25 Q. Mucci? M-u-c-c-i. Your father was John --

1 A. Yes.

2 Q. He died October 25, 1990?

3 A. Yes.

4 Q. You told us earlier he was a smoker?

5 A. Yes.

6 Q. He smoked Lucky Strikes?

7 A. Yes.

8 Q. Is that the only brand that you recall your  
9 father smoking?

10 A. Yes.

11 Q. Did your father ever quit smoking?

12 A. No. When he got cancer.

13 Q. Your father quit smoking when he got  
14 cancer; is that right?

15 A. Yes.

16 Q. Do you know when he got cancer?

17 A. No.

18 Q. What type of cancer?

19 A. Bladder, stroke, heart attack.

20 Q. So he was diagnosed with bladder cancer;  
21 right?

22 A. Yes.

23 Q. And you listed bladder cancer, stroke,  
24 heart attack. Is that what he died from? Were  
25 those his causes of death?

1 A. I do not know.

2 Q. So at some point did he have a heart  
3 attack?

4 A. Yes.

5 Q. Was it before he was diagnosed with bladder  
6 cancer?

7 A. Yes.

8 Q. Did you attribute his heart attack to his  
9 smoking?

10 A. Yes.

11 Q. Do you know when he had a heart attack?

12 A. I do not remember.

13 Q. But it was some point before he passed away  
14 in 1990; right?

15 A. Yes.

16 Q. So prior to the time -- prior to 1990, you  
17 attributed his heart attack to his cigarette  
18 smoking; right?

19 A. Yes. And stroke and bladder.

20 Q. So before 1990 you attributed your father's  
21 heart attack, bladder cancer, and stroke to his  
22 cigarette smoking; right?

23 A. Yes.

24 MS. WALD: Form.

25 ///

1 BY MS. KENYON:

2 Q. Did you discuss that with your father?

3 A. No.

4 Q. Did you discuss that with anyone in your  
5 family?

6 A. I do not know.

7 Q. Were you smoking at the time he had a heart  
8 attack?

9 A. Yes.

10 MS. WALD: It's okay. Don't worry about  
11 it.

12 BY MS. KENYON:

13 Q. So you attributed his heart attack to his  
14 smoking and you were smoking at the time. Did you  
15 try to quit smoking at that time?

16 A. Yes. 1990 and a few more times.

17 Q. Is 1990 the first time you tried to quit  
18 smoking?

19 A. Yes.

20 Q. So prior to 1990, you never tried to quit  
21 smoking; is that right?

22 A. No.

23 Q. No, you did not try to quit smoking before  
24 1990?

25 A. No.

1 Q. You did not try to quit smoking before  
2 1990; correct?

3 A. Correct. It's after my father died I tried  
4 to quit.

5 Q. So the first time you ever tried to quit  
6 smoking was after your father died on October 25,  
7 1990?

8 MS. WALD: Form.

9 THE WITNESS: When I moved to Vegas.

10 BY MS. KENYON:

11 Q. So the first time you ever tried to quit  
12 smoking was in 1990 when you moved to Vegas?

13 MS. WALD: Form. Asked and answered.

14 BY MS. KENYON:

15 Q. Is that correct?

16 A. Sometime in the '90.

17 Q. Just so I understand, you never --

18 MS. HENNINGER: She's still writing.

19 MS. WALD: That's okay. Just wait for the  
20 question.

21 BY MS. KENYON:

22 Q. Just so I'm clear, so the first time that  
23 you ever tried to quit smoking was at some point  
24 after moving to Vegas in 1990; correct?

25 MS. WALD: Form. Asked and answered.

1 BY MS. KENYON:

2 Q. Is that correct?

3 A. No. Don't know exact year, but it was when  
4 I moved to Vegas.

5 Q. And you told us earlier you moved to Vegas  
6 in 1990; correct?

7 A. Correct.

8 Q. So the first time you ever tried to quit  
9 was at some point after you moved to Vegas in 1990;  
10 correct?

11 MS. WALD: Object to form. Asked and  
12 answered.

13 BY MS. KENYON:

14 Q. I understand you don't know the exact year.  
15 The first time you ever tried to quit was at some  
16 point after you moved to Vegas; correct?

17 MS. WALD: Form.

18 MS. WALD: If you don't understand -- do  
19 you understand the question?

20 THE WITNESS: No.

21 MS. KENYON: Can you read back my question?

22 (The question was read.)

23 BY MS. KENYON:

24 Q. Is that correct?

25 A. Correct.

1           Q.    The reason you first made an effort to quit  
2    was because you believed your father died due to his  
3    smoking; correct?

4                   MS. WALD:   Object to form.

5                   THE WITNESS:   I do not know.

6   BY MS. KENYON:

7           Q.    Why did you try to quit smoking after you  
8    moved to Las Vegas?

9           A.    Getting expensive.   Cigs -- cigarettes was  
10   getting expensive.

11          Q.    The first time you tried to quit smoking  
12   was because cigarettes were getting expensive?   Is  
13   that right or not?

14          A.    Yes.

15          Q.    So it had nothing to do with the fact that  
16   your father had died of a smoking-related illness?

17                   MS. WALD:   Object to form.

18   Mischaracterizes the testimony.

19                   MS. KENYON:   We'll go off the record.

20                   MS. WALD:   We'll stay on the video.

21                   (Off the stenographic record.)

22                   MS. WALD:   We can go off the video record.

23                   THE VIDEOGRAPHER:   The time is 11:53.   We  
24   are going off the record.

25                   (A break was taken.)

1 THE VIDEOGRAPHER: The time is 12:00. We  
2 are back on the record.

3 BY MS. KENYON:

4 Q. Mrs. Camacho, are you feeling okay to go?

5 A. Yes.

6 Q. We were just talking about your father.  
7 Where was he living when he had a heart attack?

8 A. I do not remember.

9 Q. Were you living in Las Vegas when your dad  
10 had a heart attack?

11 A. No.

12 Q. Where were you living when your father had  
13 a heart attack?

14 A. I do not remember.

15 Q. Did your father have one heart attack or --  
16 did your father only have one heart attack?

17 A. I do not remember.

18 Q. If I'm understanding you correctly though,  
19 his first heart attack happened at some point before  
20 you moved to Las Vegas; is that right?

21 A. Correct. When I had my cancer, that's when  
22 I knew my father died from smoking.

23 Q. You mentioned your father also had a  
24 stroke; is that right?

25 A. Correct.



1 Q. Do you know when he had a stroke?

2 A. I do not remember.

3 Q. Do you -- strike that.

4 Did you -- you believe that his stroke was  
5 caused by his smoking?

6 MS. WALD: Form.

7 BY MS. KENYON:

8 Q. Is that right -- strike that. I'll ask a  
9 different question.

10 Did he have any other health problems  
11 during his life?

12 MS. WALD: Form.

13 THE WITNESS: I do not remember.

14 BY MS. KENYON:

15 Q. Your mother was Virginia Mucci?

16 A. Yes.

17 Q. And she is still living?

18 A. Yes.

19 Q. How is her health?

20 A. Alzheimer.

21 Q. Your mother suffers from Alzheimer's?

22 A. Yes.

23 Q. How long has she suffered from Alzheimer's?

24 A. I do not remember.

25 Q. Is she able to live by herself, or does she

1 live in a home?

2 A. No.

3 MS. WALD: Form.

4 BY MS. KENYON:

5 Q. She's not able to live by herself?

6 A. No.

7 Q. Does she live in an assisted living  
8 facility?

9 A. No.

10 Q. Where does she live?

11 A. In her house.

12 Q. Does someone live with her?

13 A. Yes.

14 Q. Who?

15 A. My sister.

16 Q. Which sister?

17 A. Donna.

18 Q. Was your mother a smoker?

19 A. Yes.

20 Q. What brands did she smoke?

21 A. I think Pall Mall.

22 Q. Is that the only brand you recall your mom  
23 smoking?

24 A. Yes.

25 Q. Did she ever quit smoking?

1 A. I do not remember.

2 Q. Is she smoking today?

3 A. No.

4 Q. So at some point she did quit smoking?

5 A. Yes.

6 Q. But you don't know the details of when or  
7 how she quit?

8 A. No.

9 Q. Do you know why your mother quit smoking?

10 A. No.

11 Q. You mentioned that your father quit smoking  
12 when he was diagnosed with bladder cancer; is that  
13 right?

14 A. I do not remember.

15 Q. But your father did quit smoking at some  
16 point; right?

17 A. Yes.

18 Q. So he quit smoking at some point prior to  
19 his death in 1990?

20 A. Yes.

21 Q. Do you know whether he quit smoking because  
22 he had a smoking-related illness?

23 MS. WALD: Object to form. Calls for  
24 speculation.

25 THE WITNESS: I do not know.

1 BY MS. KENYON:

2 Q. Why did your dad quit smoking?

3 MS. WALD: Form.

4 THE WITNESS: I do not know. I do not  
5 remember.

6 BY MS. KENYON:

7 Q. You never discussed with him why he quit  
8 smoking?

9 A. No.

10 Q. Besides the Alzheimer's, has your mom had  
11 any health problems during her life?

12 A. Not like my dad, no.

13 Q. So no illness that you attribute to her  
14 smoking?

15 MS. WALD: Form.

16 BY MS. KENYON:

17 Q. She never had an illness that you  
18 attributed to her smoking?

19 A. No.

20 Q. Do you know if she quit smoking while your  
21 father was still living?

22 A. I do not know. I do not remember.

23 Q. Growing up, did you ever hear that smoking  
24 was bad for you?

25 A. No.

1 Q. Did your parents ever talk to you about  
2 smoking when you were growing up?

3 A. No.

4 Q. So they never said anything to you about  
5 smoking?

6 MS. WALD: Form.

7 THE WITNESS: No.

8 BY MS. KENYON:

9 Q. Did your parents smoke inside the home when  
10 you were a child?

11 A. Yes.

12 Q. Did you ever tell them that you didn't like  
13 them smoking inside?

14 A. No.

15 Q. Did your parents ever find out that you  
16 were a smoker?

17 A. Did they know I smoked?

18 Q. I'll ask you, did they at any point learn  
19 that you smoked?

20 MS. WALD: Form.

21 THE WITNESS: Please repeat the question.

22 BY MS. KENYON:

23 Q. Did your parents know that you smoked?

24 MS. WALD: Form.

25 THE WITNESS: I do not remember.

1 BY MS. KENYON:

2 Q. So at any point do you know whether your  
3 parents found out that you were smoking at any point  
4 in your life?

5 MS. WALD: Object to form.

6 THE WITNESS: I do not remember. I do not  
7 know.

8 MS. LUTHER: I think she's hit her limit.

9 MR. CAMACHO: I think so.

10 MS. KENYON: Let's go off the record.

11 THE VIDEOGRAPHER: The time is 12:14. We  
12 are going off the record.

13 (A break was taken.)

14 THE VIDEOGRAPHER: The time is 12:23. This  
15 ends today's volume of the deposition of Sandra  
16 Camacho.

17 (Proceedings concluded at 12:23 p.m.)  
18  
19  
20  
21  
22  
23  
24  
25

## 1 CERTIFICATE OF REPORTER

2 STATE OF NEVADA )  
 )SS  
3 COUNTY OF CLARK )

4 I, Holly Larsen, a duly certified court reporter  
5 licensed in and for the State of Nevada, do hereby  
6 certify:

7 That I reported the taking of the  
8 deposition of the witness, Sandra Camacho, at the  
9 time and place aforesaid;

10 That prior to being examined, the witness was by  
11 me duly sworn to testify to the truth, the whole  
12 truth, and nothing but the truth;

13 That I thereafter transcribed my shorthand  
14 notes into typewriting and that the typewritten  
15 transcript of said deposition is a complete, true,  
16 and accurate record of testimony provided by the  
17 witness at said time to the best of my ability.

18 I further certify (1) that I am not a  
19 relative or employee of counsel of any of the  
20 parties; nor a relative or employee of the parties  
21 involved in said action; nor a person financially  
22 interested in the action; nor do I have any other  
23 relationship with any of the parties or with counsel  
24 of any of the parties involved in the action that  
25 may reasonably cause my impartiality to be  
questioned; and (2) that transcript review pursuant  
to NRCP 30(e) was requested.

IN WITNESS HEREOF, I have hereunto set my  
hand in the County of Clark, State of Nevada, this  
14th day of November, 2021.

*Holly Larsen*

HOLLY LARSEN, CCR NO. 680

## ERRATA SHEET

1

2

3 I declare under penalty of perjury that I have read  
4 the foregoing \_\_\_\_\_ pages of my testimony, taken on  
5 \_\_\_\_\_ (date) at \_\_\_\_\_ (city),  
6 \_\_\_\_\_ (state), and that the same is a true  
7 record of the testimony given by me at the time and  
8 place herein above set forth, with the following  
9 exceptions:

10

11	Page	Line	Should read:	Reason for change:
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25				Name Typed or Printed

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1 DISTRICT COURT

2 CLARK COUNTY, NEVADA

3 SANDRA CAMACHO, individually, and )  
 4 ANTHONY CAMACHO, individually, )

5 vs. Plaintiffs, )

)Case No.  
 )A-19-807650-C

6 PHILIP MORRIS USA INC., a foreign )  
 corporation; R. J. REYNOLDS TOBACCO )  
 7 COMPANY, a foreign corporation, )  
 individually, and as successor-by- )  
 8 merger to LORILLARD TOBACCO COMPANY )  
 and as successor-in-interest to the )  
 9 United States tobacco business of )  
 BROWN & WILLIAMSON TOBACCO )  
 10 CORPORATION, which is the )  
 successor-by-merger to THE AMERICAN )  
 11 TOBACCO COMPANY; LIGGETT GROUP, )  
 LLC, a foreign corporation; ASM )  
 12 NATIONWIDE CORPORATION d/b/a )  
 SILVERADO SMOKES & CIGARS, a )  
 13 domestic corporation; and LV SINGHS )  
 INC. d/b/a SMOKES & VAPORS, a )  
 14 domestic corporation; DOES I-X; and )  
 ROE BUSINESS ENTITIES XI-XX, )  
 15 inclusive, )  
 16 Defendants. )

17 VIDEOTAPED DEPOSITION OF SANDRA CAMACHO

18 VOLUME II

19 Taken on Wednesday, November 3, 2021

20 Through a translator

21 By a Certified Stenographer and Legal Videographer

22 At 9:04 a.m.

23 At 531 Morning Mauve Avenue

24 Las Vegas, Nevada

25 Reported by: HOLLY LARSEN, CCR 680, CA CSR 12170

1 APPEARANCES:

2 For the Plaintiffs:

3 KELLEY UUSTAL  
4 BY: KIMBERLY L. WALD, ESQ.  
5 500 North Federal Highway, Suite 200  
Fort Lauderdale, Florida 33301  
954.522.6601

6  
7 For Philip Morris USA Inc.:

8 SHOOK, HARDY & BACON L.L.P.  
9 BY: JENNIFER KENYON, ESQ.  
BY: BRIAN A. JACKSON, ESQ.  
2555 Grand Boulevard  
Kansas City, Missouri 64108  
10 816.474.6550

11  
12 For Liggett Group, LLC:

13 KASOWITZ BENSON TORRES LLC  
14 BY: KELLY ANNE LUTHER, ESQ.  
1441 Brickell Avenue, Suite 1420  
Miami, Florida 33131  
786.587.1045

15  
16 For R. J. Reynolds Tobacco Company:

17 KING & SPALDING  
18 BY: URSULA M. HENNINGER, ESQ.  
300 South Tryon Street, Suite 1700  
Charlotte, North Carolina 28202  
19 704.503.2631

20  
21 Also Present:

22 GIAN SAPIENZA, Legal Videographer  
23 DWAYNE PARRETTE, Translator/Reader  
ANTHONY CAMACHO

24

25

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1 P R O C E E D I N G S

2

3 THE VIDEOGRAPHER: This begins the  
4 video-recorded deposition of Sandra Camacho taken on  
5 Wednesday, November 3, 2021, at 9:04 a.m. This  
6 deposition is being held at 531 Morning Mauve  
7 Avenue, Las Vegas, Nevada 89183, entitled Sandra and  
8 Anthony Camacho versus Philip Morris USA Inc., et  
9 al., in the District Court, Clark County, Nevada.  
10 Case Number A-19-807650-C.

11 My name is Gian Sapienza with Certified  
12 Legal Videography. The court reporter is Holly  
13 Larsen with Oasis Reporting Services.

14 Will the attorneys please state your name  
15 and affiliation for the record.

16 MS. WALD: Kimberly Wald from Kelley Uustal  
17 on behalf of the plaintiff.

18 MS. KENYON: Jennifer Kenyon on behalf of  
19 Philip Morris USA.

20 MR. JACKSON: Brian Jackson on behalf of  
21 Philip Morris USA.

22 MS. LUTHER: Kelly Luther on behalf of  
23 Liggett Group, LLC.

24 MS. HENNINGER: Ursula Henninger on behalf  
25 of R. J. Reynolds Tobacco Company.

1 THE VIDEOGRAPHER: Thank you. The court  
2 reporter will now administer the oath.

3 (The witness and translator previously.  
4 sworn.)

5

6 EXAMINATION (Continued)

7 BY MS. KENYON:

8 Q. Good morning, Mrs. Camacho. How are you?  
9 Are you doing okay?

10 A. Yes.

11 Q. So same procedures as yesterday. You've  
12 got your answer sheets in front of you. Dwayne over  
13 here is going to read your answers if you point to  
14 it, and if you need to explain more, you have the  
15 whiteboard. Sound good?

16 A. Yes.

17 Q. Do you feel rested and ready to go today?

18 A. Yes.

19 Q. Yesterday we were talking a little bit  
20 about your two sisters. They're both living; right?

21 A. Yes.

22 Q. So we'll start with Donna. Does that sound  
23 good?

24 A. Okay.

25 Q. She was born in 1944. Does that sound

1 right?

2 A. Please repeat the question.

3 Q. Donna was born in 1944?

4 A. Yes.

5 Q. So she's your older sister?

6 A. Yes.

7 Q. Has she ever been a smoker?

8 A. Yes.

9 Q. How did you learn that she was a smoker?

10 A. We smoked.

11 Q. You and your sister smoked together?

12 A. No. We both smoked.

13 Q. Do you know when your sister Donna started  
14 smoking?

15 A. No.

16 Q. Do you know what brand she smoked?

17 A. No.

18 Q. Do you know what brand of cigarettes your  
19 sister Donna smoked at any point in time?

20 A. No.

21 Q. Did you ever share cigarettes with your  
22 sister Donna?

23 A. I do not remember.

24 Q. For example, did you ever run out of  
25 cigarettes and bum a cigarette from your sister?



1 A. No.

2 Q. Did your sister Donna ever quit smoking?

3 A. Yes.

4 Q. When did she quit?

5 A. I do not know.

6 Q. Do you know why she quit smoking?

7 A. No.

8 Q. Have you discussed with her the fact that  
9 she quit smoking?

10 A. No.

11 Q. Did she quit before or after you quit  
12 smoking?

13 A. I do not know. No.

14 Q. So you wrote on your white board that you  
15 thought maybe she quit before you, but you don't  
16 know?

17 A. I do not remember. All I know and remember  
18 is that she smoked.

19 Q. That she smoked and quit at some point;  
20 right?

21 A. Yes.

22 Q. Did she ever encourage you to quit smoking?

23 A. No.

24 Q. Did you ever discuss quitting smoking with  
25 your sister at all?

1 A. No.

2 Q. Did you ever discuss smoking with your  
3 sister Donna at all?

4 A. No.

5 Q. Has your sister Donna had any health  
6 issues?

7 A. No.

8 Q. Linda Blake is your other sister; is that  
9 right?

10 A. Yes.

11 Q. And she was born in 1948; is that right?

12 A. Yes.

13 Q. So she's your younger sister?

14 A. Yes.

15 Q. Has she ever been a smoker?

16 A. No.

17 Q. Have you ever talked with your sister Linda  
18 about smoking?

19 A. No.

20 Q. Has Linda ever encouraged you to quit  
21 smoking?

22 A. No.

23 Q. Did your sister Linda ever talk with you  
24 about the health risks of smoking?

25 A. No. We never talked about that.

1 MS. WALD: Remember, when you hold it up,  
2 hold it up so the camera can see it too every time.  
3 Good job.

4 BY MS. KENYON:

5 Q. Has your sister Linda ever had any health  
6 issues?

7 A. No.

8 Q. Yesterday we talked about your two  
9 children, John and Laura; is that right?

10 A. Yes.

11 Q. They're children that you share with your  
12 ex-husband Dominic?

13 A. Yes.

14 Q. You and Mr. Camacho don't have any children  
15 together; right?

16 A. No.

17 Q. So I want to start with your son John. He  
18 was born in 1967; is that right?

19 A. Yes.

20 Q. Has your son John ever been a smoker?

21 A. No.

22 Q. Have you ever discussed smoking with your  
23 son John?

24 A. No.

25 Q. Growing up did you ever tell your son John

1 not to smoke?

2 A. No.

3 Q. Did John ever talk with you about your  
4 smoking?

5 A. No.

6 Q. Did he ever ask you to quit smoking?

7 A. No.

8 Q. Did he ever tell you anything about the  
9 health risks of smoking?

10 A. No.

11 Q. Does John have any health issues?

12 A. No.

13 Q. What does he do for a living?

14 A. Work at Supreme for his father.

15 Q. If I'm recalling correctly, is that Supreme  
16 Lobster or Seafood?

17 A. Yes.

18 Q. Does John have any children?

19 A. Yes.

20 Q. How many?

21 A. One.

22 Q. What is his or her name?

23 A. I do not remember.

24 Q. Are you doing okay? Do you need to take a  
25 minute? It's okay. We can take a minute if you

1 want.

2 MS. WALD: You're okay to keep going?

3 You're okay?

4 THE WITNESS: (Inaudible response.)

5 MS. WALD: You're okay?

6 THE WITNESS: (Inaudible response.)

7 MS. KENYON: Just for the record she said  
8 that she was okay to proceed.

9 THE WITNESS: Yes.

10 BY MS. KENYON:

11 Q. We'll talk about your daughter Laura.  
12 Sound good?

13 A. Yes.

14 Q. She was your second child. She was born in  
15 1969; is that right?

16 A. Yes.

17 Q. Has your daughter Laura ever been a smoker?

18 A. Yes.

19 Q. When did she start smoking?

20 A. I do not remember.

21 Q. How did you find out she was smoking?

22 A. I do not remember. I do not know.

23 Q. What did you do when you found out that  
24 Laura was smoking?

25 A. Nothing.

1 Q. Did you tell her that she should not smoke?

2 A. No.

3 Q. Why not?

4 A. Please repeat the question.

5 Q. I'll ask a little bit different question.

6 When Laura was a child, when she was growing up, did  
7 you ever tell her not to smoke?

8 A. No.

9 Q. When she was in school, did she ever learn  
10 about the health risks of smoking?

11 MS. WALD: Object to form.

12 You can answer.

13 THE WITNESS: I do not remember.

14 BY MS. KENYON:

15 Q. Did she ever talk to you about the health  
16 risks of smoking?

17 A. No.

18 Q. Do you know -- strike that.

19 What brand of cigarette did Laura smoke?

20 A. Marlboro Light.

21 Q. Did you ever share cigarettes with your  
22 daughter Laura?

23 A. Yes.

24 Q. How often?

25 A. Often.

1 Q. Was Marlboro Light always her -- strike  
2 that.

3 Was Marlboro Light the only brand you  
4 recall her smoking?

5 A. Yes.

6 Q. Has she quit smoking?

7 A. No.

8 Q. Have you ever discussed quitting smoking  
9 with your daughter Laura?

10 MS. WALD: Form.

11 THE WITNESS: Maybe once.

12 BY MS. KENYON:

13 Q. Can you tell me what you recall?

14 A. Please repeat the question.

15 Q. You said that you discussed quitting  
16 smoking with your daughter Laura. You discussed it  
17 with her. Is that what you're saying?

18 A. Yes.

19 Q. Can you tell me what you -- did you tell  
20 her something?

21 A. I told her I want to quit smoking. Don't  
22 like smell and expensive.

23 MS. WALD: Sandra, make sure you're  
24 listening to the question. I think she's asking you  
25 something different. Just make sure you listen to

1 her question.

2 BY MS. KENYON:

3 Q. I think you did answer my question. So you  
4 told Laura that you wanted to quit smoking; is that  
5 right?

6 A. (Inaudible response.)

7 Q. You're mouthing "I wanted to"; is that  
8 right?

9 MS. WALD: Can you point if that was  
10 correct, what you just mouthed? It's okay. Try not  
11 to mouth an answer. Either point or write it down.  
12 I know it's hard.

13 THE WITNESS: (Inaudible response.)

14 I don't know if I'm coming or going with  
15 paper board.

16 MS. HENNINGER: She needs to take a break I  
17 think.

18 MS. LUTHER: Yeah, let's go off the record.

19 MS. WALD: We're going to go off the video.

20 THE VIDEOGRAPHER: The time is 9:24. We're  
21 going off the record.

22 (A break was taken.)

23 THE VIDEOGRAPHER: Time is 9:30. We are  
24 back on the record.

25 ///



1 BY MS. KENYON:

2 Q. Mrs. Camacho, we're back. Are you ready to  
3 go?

4 A. Yes.

5 Q. Just for the record, during the break,  
6 Mrs. Camacho asked that I slow down when I'm asking  
7 the questions. I'm going to do my best to talk a  
8 little bit slower. But if you can't understand me,  
9 just let me know, and I will go slower or I will  
10 repeat the question.

11 A. Okay.

12 Q. We were talking about your sister Donna and  
13 her smoking earlier this morning. Did Donna smoke  
14 when she was living at home with your parents?

15 A. I do not remember.

16 Q. Do you know whether she was smoking when  
17 you were still living at home with your parents?

18 A. I do not remember.

19 Q. Did your parents ever find out that Donna  
20 was smoking?

21 A. I'm sure they did.

22 Q. Why are you sure that they found out she  
23 was smoking?

24 A. I think my sister told them.

25 Q. How did your parents react when she told

1     them?

2           A.    I do not remember.

3           Q.    You mentioned that she quit smoking. Did  
4 she tell you how she quit smoking?

5           A.    No.

6           Q.    Did she tell you how she felt when she quit  
7 smoking?

8           A.    No.

9           Q.    And you never asked her how she quit  
10 smoking?

11          A.    No.

12          Q.    Why not?

13          A.    We never talked about it.

14          Q.    Is it because you didn't want to quit  
15 smoking?

16                   MS. WALD:   Form.

17 BY MS. KENYON:

18          Q.    Was it because you did not want to quit  
19 smoking?

20          A.    I still smoked when she quit.

21          Q.    Right. And did you not want to quit  
22 smoking at that time?

23          A.    I was already addicted.

24          Q.    Did you ever tell your doctors you did not  
25 want to quit smoking? Did you ever tell your

1 doctors that you did not want to quit smoking?

2 A. No.

3 Q. You have no memory of telling your doctors  
4 at any point that you did not want to quit smoking?

5 MS. WALD: Object to form.

6 THE WITNESS: Never discussed my smoking.

7 BY MS. KENYON:

8 Q. You never discussed your smoking with your  
9 doctors?

10 A. No.

11 Q. So you don't have any memory at any point  
12 of your doctors telling you to quit smoking?

13 MS. WALD: Object to form.

14 THE WITNESS: No.

15 (Exhibit 6 marked.)

16 BY MS. KENYON:

17 Q. I'm handing you what I've marked as Defense  
18 Exhibit 6. Can you see that? Do you see at the top  
19 where it says "Dignity Health Medical Group Nevada"?

20 A. Yes.

21 Q. Underneath that, "Name: Camacho, Sandra."  
22 Do you see that?

23 A. Yes.

24 Q. Then to the right reads "DOB: 4/28/1946."  
25 Do you see that right over here (indicating)?

1 A. Yes.

2 Q. Then underneath that it reads "Date of  
3 Service: 12/7/2015." Do you see that?

4 A. Yes.

5 Q. And then underneath there it reads  
6 "Physician: Celeste Atkins [sic]." Right there.  
7 "Celeste Atkins." Do you see that?

8 A. Yes.

9 Q. Do you remember Dr. Atkins?

10 A. No.

11 Q. So if you would turn to the second page,  
12 flip the page over, under "Office and Clinic  
13 Notes" -- do you see "Office and Clinic Notes"  
14 (indicating)?

15 A. Yes.

16 Q. And then under "Assessment/Plan," do you  
17 see Number 3?

18 A. Yes.

19 Q. "Advised to DC" -- and that means  
20 discontinue -- "smoking" --

21 A. I do not remember.

22 Q. Hold on. Let me get my question out.

23 Do you see where your doctor wrote in your  
24 medical records, "Advised to discontinue smoking,  
25 patient not willing at this time"?

1 A. I do not remember.

2 Q. Do you think your doctors have your best  
3 interests in mind when they're treating you?

4 A. Yes.

5 Q. Do you think there's any reason why your  
6 doctors would write in the medical record something  
7 that you didn't tell them?

8 MS. WALD: Object to form.

9 THE WITNESS: Please repeat the question.

10 BY MS. KENYON:

11 Q. I'm going to ask a different question. If  
12 you look under "Tobacco," do you see that under  
13 "Tobacco"? It says, "Current every day smoker, 5  
14 years, total pack years 50, started age 18." That's  
15 all correct; right?

16 MS. WALD: Object to form.

17 THE WITNESS: What the 50?

18 BY MS. KENYON:

19 Q. So total pack years -- this medical record  
20 is saying that you smoked for 50 years.

21 A. Yes.

22 Q. And that you started smoking at age 18.  
23 That's correct; right?

24 A. Yes.

25 Q. So that information that your doctor wrote

1 in this medical record is correct?

2 MS. WALD: Form.

3 THE WITNESS: Yes.

4 BY MS. KENYON:

5 Q. And then under "Family history: Bladder  
6 cancer, father." That information is correct;  
7 right?

8 A. Yes.

9 Q. So where Dr. Atkins wrote "Advised to  
10 discontinue smoking, patient not willing at this  
11 time," you just don't recall -- do you recall  
12 telling her that you were not willing to quit at  
13 that time?

14 MS. WALD: Form. Asked and answered.

15 THE WITNESS: I do not remember.

16 BY MS. KENYON:

17 Q. If there are other medical records from  
18 different doctors that say the same thing, that you  
19 told them you were not willing to quit smoking at  
20 that time, why do you think -- where do you think  
21 that information came from?

22 MS. WALD: Object to form.

23 THE WITNESS: Please repeat the question.

24 BY MS. KENYON:

25 Q. So if there are additional medical records

1 from your other doctors that also say that you were  
2 not willing to quit smoking at that time when your  
3 doctors told you to quit, do you have any reason to  
4 dispute what your doctors wrote in your records?

5 MS. WALD: Object to form.

6 THE WITNESS: I do not remember. I tried  
7 many times to quit but was addicted. Could not  
8 quit.

9 BY MS. KENYON:

10 Q. There were times you did not want to quit  
11 smoking; is that true?

12 MS. WALD: Object to form. Argumentative.

13 THE WITNESS: Please repeat the question.

14 BY MS. KENYON:

15 Q. There were times you did not want to quit  
16 smoking; right?

17 MS. WALD: Form.

18 THE WITNESS: (Inaudible response.)

19 BY MS. KENYON:

20 Q. There were times that you did not want to  
21 quit smoking; right?

22 MS. WALD: Form.

23 THE WITNESS: Yes.

24 BY MS. KENYON:

25 Q. We talked about the fact that your daughter

1 Laura is still smoking?

2 A. Yes.

3 Q. Have you asked her to quit smoking given  
4 what you have been through?

5 A. Yes.

6 Q. What did you tell her?

7 A. I told her she doesn't want to end up like  
8 me.

9 Q. What was her response?

10 A. She cries.

11 Q. Did she try to quit smoking when you talked  
12 to her?

13 A. I do not know.

14 Q. Did she tell you that she would try to quit  
15 smoking?

16 A. She can't. I see it.

17 Q. Do you know whether she has actually tried  
18 to quit?

19 A. No.

20 Q. Has your daughter Laura had any health  
21 problems?

22 A. No.

23 Q. What does she do for a living?

24 A. Works at Supreme Lobster.

25 Q. Does she have any children?



1 A. Yes.

2 Q. How many?

3 A. Two.

4 Q. What are their names?

5 A. Dominic and Gina.

6 Q. How old is Dominic?

7 A. Last year of college, maybe 20.

8 Q. Does he smoke?

9 A. No.

10 Q. Have you ever talked to Dominic about  
11 smoking?

12 A. No.

13 Q. How old is her daughter Gina?

14 A. First year of college, 18 or 19.

15 Q. Does she smoke?

16 A. No.

17 Q. Have you ever talked to her about smoking?

18 A. No.

19 Q. I'm going to switch gears a little bit and  
20 talk about when you were in school, when you were in  
21 high school. Okay?

22 A. Okay.

23 Q. Did you play any sports in high school?

24 A. I do not remember.

25 Q. Were you in any clubs or organizations in

1 high school?

2 A. I do not remember.

3 Q. Did your school have any rules about  
4 smoking?

5 A. I do not remember. I do not know.

6 Q. Did your teachers ever talk to you about  
7 smoking?

8 A. No. I don't think so.

9 Q. You live in Las Vegas?

10 A. Yes.

11 Q. Do you gamble?

12 A. Used to occasional when we could afford it.

13 Q. Would you go to the casinos to gamble?

14 A. Before, yes.

15 Q. When you say "before," before COVID?

16 A. (Indicating.) My cancer. I am stuck in  
17 house.

18 Q. Is that partially due to the COVID-19  
19 pandemic?

20 A. No. Too many machines to take and very  
21 embarrassing.

22 Q. Could you go out for short periods of time?

23 A. Maybe for malt.

24 Q. Do you mean like a milkshake, like a drink?

25 A. Yes.

1 Q. Where do you go get a malt?

2 A. Dairy Queen.

3 Q. How often do you do that?

4 A. Maybe three times a week.

5 Q. Who takes you to get a malt?

6 A. Husband.

7 Q. Are you able to go for walks outside?

8 A. No.

9 Q. Why not?

10 A. Either too hot or windy.

11 Q. What about in the cooler months like right  
12 now?

13 A. Step out in backyard.

14 Q. So do you not go on walks because you don't  
15 want to?

16 MS. WALD: Form. Mischaracterizes  
17 testimony.

18 You can answer.

19 THE WITNESS: Gets me very tired.

20 Have to -- missiles.

21 MS. KENYON: We'll go off the record.

22 MS. WALD: We'll stay on the video.

23 MR. JACKSON: Just so it's clear, we have  
24 our continuing objection to that, but that's  
25 understood.

1 (Off the stenographic record.)

2 THE VIDEOGRAPHER: The time is 10:16, and  
3 we are back on the record.

4 BY MS. KENYON:

5 Q. Are you ready to go, Mrs. Camacho?

6 A. Yes.

7 Q. Before we took a break, we were talking  
8 about going for walks and going out. Can you tell  
9 me what machines you need?

10 A. Suction, humidifier, oxygen carry with me,  
11 and big machine on all night around my neck.

12 Q. So if I'm understanding you correctly,  
13 that's four different -- what you just listed are  
14 four different machines; is that right?

15 A. Yes.

16 Q. Okay. So the big machine that you have on  
17 all night around your neck, do you only use that at  
18 nighttime when you're sleeping?

19 A. Yes.

20 Q. So you do not need to bring the big machine  
21 out with you when you leave your home; correct?

22 A. No.

23 Q. No, you do not need to bring the big  
24 machine with you outside your home?

25 A. No. Little oxygen.

1 Q. So the big machine at night, it's oxygen?

2 A. Yes.

3 Q. You have portable oxygen that you can use  
4 during the day?

5 A. Yes.

6 Q. So you're able to take the portable oxygen  
7 with you when you leave your home?

8 A. Always.

9 Q. How often do you have to use oxygen during  
10 the day?

11 A. A few times.

12 Q. Does that mean two times? Three times a  
13 day? What does "a few times" mean?

14 A. Four or five.

15 Q. I only ask because we were here from about  
16 9:00 to 12:30 yesterday and I did not see you use  
17 it. And we've been here about two and a half hours  
18 today and you have not used it.

19 MS. WALD: For the record, during one of  
20 the breaks yesterday when you-all stepped outside,  
21 she was using the machine.

22 THE WITNESS: After you leave, I try to do  
23 things, and that's when I need it, not sitting down.  
24 Very rarely.

25 ///

1 BY MS. KENYON:

2 Q. So if I'm understanding you correctly, you  
3 use the oxygen more when you're up -- strike that.

4 You don't need the oxygen when you're just  
5 sitting down; is that right?

6 MS. WALD: Form.

7 THE WITNESS: Correct.

8 BY MS. KENYON:

9 Q. The third machine that you mentioned was a  
10 humidifier?

11 MS. WALD: Can you point --

12 THE WITNESS: Yes.

13 BY MS. KENYON:

14 Q. Do you need a humidifier when you leave the  
15 home?

16 A. No.

17 Q. Is the humidifier something that's just  
18 running at all times inside your home?

19 A. When I need it.

20 Q. And then the fourth machine that you  
21 mentioned is the suction machine?

22 A. Yes.

23 Q. When you leave the house, do you have to  
24 take that with you?

25 A. Yes, and oxygen.

1 Q. How often do you have to do the suction  
2 machine?

3 A. Too many to count.

4 Q. Does that mean five times a day?

5 A. More.

6 Q. Ten times a day?

7 A. More.

8 Q. How long can you go between one suction to  
9 the next?

10 A. I don't really know. Not long.

11 Q. Is it fair to say you can go at least  
12 30 minutes between suction?

13 MS. WALD: Form.

14 THE WITNESS: Yes.

15 BY MS. KENYON:

16 Q. Would it be fair to say that you can go an  
17 hour between suction?

18 MS. WALD: Form.

19 THE WITNESS: No, not really. Maybe. I do  
20 not know. Never kept track.

21 BY MS. KENYON:

22 Q. Both the suction and the portable oxygen  
23 are both machines that are portable and you can  
24 leave your house with; right?

25 A. Yes.

1 Q. Earlier we were talking about your daughter  
2 and how she smokes. Was she smoking when she was  
3 living at home with you?

4 A. I do not remember.

5 Q. You do not know whether she started smoking  
6 before she moved out of your home?

7 A. I do not remember.

8 Q. Do you know whether she tried smoking or  
9 started smoking in high school?

10 A. I do not remember. I do not know.

11 Q. Earlier we were also talking about gambling  
12 and you used to go to the casinos. What casinos did  
13 you go to?

14 A. South Point.

15 Q. Did you have a player's card at  
16 South Point?

17 A. Yes.

18 Q. When is the last time you went to  
19 South Point?

20 A. Almost four years ago.

21 Q. How often would you go to South Point?

22 A. When we could afford it.

23 Q. How often could you afford it?

24 A. At the time maybe two or three.

25 Q. Two or three times a week?



1 A. Yes. Played pennies.

2 Q. When you say "played pennies," do you mean  
3 that you played the penny slots?

4 A. Yes.

5 Q. Are you doing okay?

6 A. Yes.

7 Q. Were there any other casinos that you liked  
8 to go to?

9 A. No.

10 Q. You mentioned penny slots. Were there any  
11 other games you liked to play like poker?  
12 Blackjack?

13 A. No.

14 Q. Did your husband, Anthony, gamble?

15 A. Yes.

16 Q. What did he play?

17 A. We played together penny slot.

18 Q. So he also liked playing penny slots?

19 A. One machine together.

20 Q. Understood. Did you enjoy gambling?

21 A. It was an outing.

22 Q. So you enjoyed playing penny slots with  
23 your husband?

24 A. Yes.

25 Q. When you would go to South Point -- strike

1     that.

2                 Did you ever win on the penny slots?

3             A.    Yes.

4             Q.    What's the most you ever won?

5             A.    \$100.

6                 MS. LUTHER:   That's a lot of pennies.

7     BY MS. KENYON:

8             Q.    I would be very excited about that as well.

9     Have you ever lost on penny slots?

10            A.    Of course.

11            Q.    When you would go to South Point, would you  
12 go with a set amount of money to spend?

13            A.    Yes.

14            Q.    How much was that?

15            A.    30 to \$50.

16            Q.    And once you were done, once you had spent  
17 the 30 or \$50, what would you do?

18            A.    Had to come home.

19            Q.    What was it that you liked about the penny  
20 slots?

21            A.    Cheaper to play.

22            Q.    Did you get a thrill or a rush from playing  
23 the penny slots?

24            A.    If we hit something.

25            Q.    And when you say "if we hit something," you

1 mean if you won money?

2 A. Yes.

3 Q. Did you smoke inside the casino?

4 A. Yes.

5 Q. Where would you smoke?

6 A. At the machine.

7 Q. Would you drink alcohol when you went to

8 the casino?

9 A. No.

10 Q. Did you ever buy cigarettes at South Point?

11 A. No.

12 Q. Do you do any online gambling now?

13 A. Sometimes.

14 Q. What do you play?

15 A. Slots and sometimes poker.

16 Q. How often do you play online poker?

17 A. Not often.

18 Q. Does that mean once or twice a week? More

19 than that?

20 A. Once a day for half hour to one hour.

21 Q. Do you play online poker for money?

22 A. No.

23 Q. When you would go to the casinos, you

24 understood that gambling with your money was risky.

25 Is that fair?

1 MS. WALD: Object to form.

2 THE WITNESS: Yes.

3 BY MS. KENYON:

4 Q. You could lose the money that you brought?

5 A. Yes.

6 Q. But you made the choice to play the penny  
7 slots?

8 A. All we could afford.

9 Q. I understand that. You took the money that  
10 you had that you could afford to spend and made the  
11 choice to play penny slots?

12 A. Yes.

13 Q. Is that because it was something that you  
14 enjoyed?

15 A. Sometimes.

16 Q. And the sometimes that you did enjoy it, is  
17 that when you were winning money?

18 A. Yes. If I hit something little while  
19 playing, I was thrilled, and we stayed.

20 Q. You also understand that, if you gamble,  
21 you can lose money; right?

22 A. Yes.

23 Q. And you told us that you have, in fact,  
24 lost money before?

25 A. Yes.

1 Q. Did you blame anyone else when you lost  
2 money?

3 A. No.

4 MS. WALD: Form.

5 BY MS. KENYON:

6 Q. Would you blame anyone else for losing  
7 money?

8 A. Just me and Tony.

9 Q. Did you take responsibility for your choice  
10 to play the penny slots?

11 A. Yes.

12 Q. Has gambling ever been an issue in your  
13 marriage?

14 A. No.

15 Q. Has anyone ever suggested to you that you  
16 have a gambling problem?

17 A. No.

18 Q. Earlier you -- are you okay?

19 A. (Indicating.)

20 MS. KENYON: Off the record.

21 THE VIDEOGRAPHER: The time is 10:44. We  
22 are going off the record.

23 (A break was taken.)

24 THE VIDEOGRAPHER: The time is 10:46.

25 We're going back on the record.

1 MS. WALD: Before we proceed into  
2 questioning, during the break, I conferred with  
3 counsel for R. J. Reynolds, Ms. Henninger. During  
4 the break in this deposition, the judge signed the  
5 order and R. J. Reynolds is back in the case.  
6 Ms. Henninger is here and has been able to observe  
7 the first day of proceedings in this deposition.  
8 She is here. Now that R. J. Reynolds is here, she  
9 is going to be here and fully participate on behalf  
10 of Reynolds.

11 BY MS. KENYON:

12 Q. Ms. Camacho, are you doing okay?

13 A. Yes.

14 Q. Feeling okay to keep going?

15 A. Yes.

16 Q. I want to talk a little bit about your  
17 employment history. Sound good?

18 A. Yes.

19 Q. You told us yesterday you worked as a  
20 waitress at Denny's?

21 A. Yes.

22 Q. And you also worked as a waitress at IHOP?

23 A. Yes.

24 Q. When you were a waitress at Denny's, were  
25 you ever -- did you ever get in trouble for smoking

1 at work?

2 A. No.

3 Q. Were you able to complete your job as a  
4 waitress successfully despite the fact that your  
5 smoking was limited while you were working?

6 A. Please repeat the question.

7 Q. At Denny's when you were a waitress, your  
8 smoking did not impact your ability to successfully  
9 do your job as a waitress; is that right? Correct?

10 A. Yes. Correct.

11 Q. At IHOP -- when you were a waitress at  
12 IHOP, were customers allowed to smoke inside the  
13 restaurant?

14 A. Yes.

15 Q. Were employees allowed to smoke inside  
16 IHOP?

17 A. Yes.

18 Q. Was there a designated area where you had  
19 to smoke at IHOP?

20 A. Yes.

21 Q. Where was that?

22 A. Off to the side, a little room.

23 Q. So there was a small room away from the  
24 restaurant?

25 A. Yes. Yes.

1 Q. Would you smoke in that room on a break?

2 A. Yes.

3 Q. Would you smoke while you were serving  
4 customers?

5 A. After I served them, then went to have a  
6 couple puffs.

7 Q. So when you would go take a couple puffs,  
8 you would not smoke the whole cigarette; is that  
9 right?

10 MS. WALD: Are we still talking just IHOP  
11 or --

12 MS. KENYON: Yeah.

13 THE WITNESS: Right. Pinched it.

14 BY MS. KENYON:

15 Q. What does "pinched it" mean?

16 A. Die it out.

17 Q. So you would take the cigarette and pinch  
18 the end to make the light go out?

19 A. Yes.

20 Q. And then would you leave it in the ashtray?

21 A. Yes.

22 Q. And then you would go serve your customers?

23 A. Yes.

24 Q. And you would not smoke while you were  
25 serving customers?



1 A. No.

2 Q. And then how long would it be until you  
3 came back to that cigarette that you pinched out?

4 A. Not long.

5 Q. How long would a cigarette last while you  
6 were working at IHOP?

7 A. One hour.

8 Q. So you would smoke one cigarette over the  
9 course of an hour while working at IHOP?

10 A. Yes.

11 Q. Did you do the same thing when you were  
12 working as a waitress at Denny's?

13 A. Yes.

14 Q. How long were your shifts when you worked  
15 at Denny's?

16 A. 6:00 to 2:00. 7:00 to 3:00.

17 Q. So eight-hour shifts?

18 A. Yes.

19 Q. During your eight-hour shifts, you would  
20 smoke approximately eight cigarettes?

21 A. Maybe a little more because on break I  
22 myself smoked two.

23 Q. During your eight-hour shifts, how many  
24 breaks would you get?

25 A. I do not remember.

1 Q. Did you ever count the number of cigarettes  
2 you smoked during a shift?

3 A. No.

4 Q. Then for IHOP how long were your shifts at  
5 IHOP?

6 A. Same.

7 Q. And did you get a break while working an  
8 eight-hour shift at IHOP?

9 A. Yes.

10 Q. Do you know how many breaks you got?

11 A. I do not remember.

12 Q. Did you ever keep track of the number of  
13 cigarettes you smoked during a shift?

14 A. No.

15 Q. At IHOP were you ever -- strike that.

16 At IHOP did you ever get in trouble for  
17 smoking at work?

18 A. No.

19 Q. So you were able to successfully work as a  
20 waitress at IHOP?

21 A. Yes.

22 Q. Despite the fact that your smoking was  
23 limited during the working hours?

24 MS. WALD: Object to form.

25 Mischaracterizes testimony.

1           You can answer.

2           THE WITNESS: Please repeat the question.

3   BY MS. KENYON:

4           Q.    Sure. You were able to successfully  
5   complete your work as a waitress at IHOP despite the  
6   fact that your smoking was limited; correct?

7           MS. WALD: Same objection.

8           THE WITNESS: It really wasn't limited  
9   because I took puffs during work.

10   BY MS. KENYON:

11          Q.    When you were working at IHOP, would one  
12   cigarette last about an hour?

13          A.    Yes.

14          Q.    You told us that you went to beauty school;  
15   is that right?

16          A.    Yes.

17          Q.    Sorry. I'm trying to slow down, so just  
18   let me know if I'm not going slow enough for you to  
19   understand. Hopefully I'm getting a little better.

20          A.    Yes.

21          Q.    Did you ever obtain a cosmetology license?

22          A.    Yes.

23          Q.    Do you recall when?

24          A.    Right after high school.

25          Q.    And you graduated 1964; is that right? You

1 graduated from high school in 1964?

2 A. Yes.

3 Q. Did you ever work as a cosmetologist?

4 A. Yes.

5 Q. What did you do? Did you style hair? Did  
6 you do nails?

7 A. Yes -- no.

8 Q. So was it only hair?

9 A. Yes.

10 Q. Did you cut and color people's hair?

11 MS. WALD: Form.

12 THE WITNESS: Couple times because we had a  
13 girl that just did the --

14 MS. KENYON: Perms.

15 THE WITNESS: Perms and color.

16 You need a rest?

17 THE TRANSLATOR: No. Thank you.

18 BY MS. KENYON:

19 Q. So if I'm understanding correctly, you  
20 primarily cut people's hair?

21 A. Yes.

22 Q. Would you smoke while you were cutting  
23 someone's hair?

24 A. Yes.

25 Q. Did anyone ever ask you not to smoke while

1 cutting their hair?

2 A. No.

3 Q. Did you work at a salon?

4 A. Yes.

5 Q. What was the name of the salon?

6 A. I do not remember.

7 Q. How long did you work there?

8 A. I do not remember.

9 Q. When you were cutting people's hair, were  
10 the patrons, the customers, were they allowed to  
11 smoke inside?

12 A. Yes.

13 Q. Did some of your customers smoke while you  
14 cut their hair?

15 A. Yes.

16 Q. Was there ever a time where you could not  
17 smoke when you were working at the beauty salon?

18 A. No.

19 Q. Did you ever get in trouble for smoking at  
20 work?

21 A. No.

22 Q. Then I believe you also worked at 7-Eleven?

23 A. Yes.

24 Q. What did you do at 7-Eleven?

25 A. Cashier.

1 Q. Was that a full-time job? I'll ask it a  
2 little bit differently.

3 How many hours a day did you work at  
4 7-Eleven?

5 A. Full shift.

6 Q. Is that like 9:00 to 5:00-type shift?

7 A. 6:00 to 2:00. 7:00 to 3:00.

8 Q. So still eight-hour shifts that you would  
9 work; correct?

10 A. Yes.

11 Q. Did you smoke when you worked at 7-Eleven?

12 A. Yes.

13 Q. When you were behind the cash register at  
14 7-Eleven, were you allowed to smoke?

15 A. No.

16 Q. When did you smoke when you were working at  
17 7-Eleven?

18 A. Whenever I could.

19 Q. Were you given breaks during your  
20 eight-hour shift?

21 A. Yes.

22 Q. Is that when you would smoke when you were  
23 working at 7-Eleven?

24 A. Please repeat the question.

25 Q. Would you smoke during your breaks at

1 7-Eleven?

2 A. Yes.

3 Q. Besides smoking on a break, were you able  
4 to smoke any other time?

5 A. Yes.

6 Q. Even though you weren't supposed to?

7 MS. WALD: Form. Mischaracterizes  
8 testimony.

9 THE WITNESS: No one said we couldn't.

10 BY MS. KENYON:

11 Q. I thought you just said that you could not  
12 smoke behind the cash register; is that right?

13 A. No.

14 Q. No, you could not smoke behind the cash  
15 register?

16 A. No. Back room. Same as waitressing.

17 Q. But when you were working behind a cash  
18 register, were you the only one working at that  
19 time?

20 MS. WALD: Form.

21 THE WITNESS: Two or three on a shift.

22 BY MS. KENYON:

23 Q. Did you do the same thing at 7-Eleven that  
24 you did at IHOP and Denny's where you would pinch  
25 the cigarette out?

1 A. Yes.

2 Q. So would a cigarette last about an hour?

3 A. At 7-Eleven, Texaco, more than one  
4 cigarette in an hour.

5 Q. How many cigarettes would you smoke in an  
6 hour while working at 7-Eleven?

7 A. I do not know. I do not remember.

8 Q. So even though you couldn't smoke behind  
9 the cash register, you're telling me that you smoked  
10 more than one cigarette in an hour at 7-Eleven?

11 A. Yes.

12 Q. Did you ever get in trouble for smoking at  
13 work?

14 A. No.

15 Q. Did you sell cigarettes while working at  
16 7-Eleven? Did you sell cigarettes while working at  
17 7-Eleven?

18 A. Yes.

19 Q. What brands?

20 A. All.

21 Q. Did that ever influence what brands you  
22 smoked?

23 A. No.

24 Q. Did you buy cigarettes from 7-Eleven while  
25 you worked there?



1 A. Yes.

2 Q. How often?

3 A. I bought my cigarettes from smoke shop and  
4 7-Eleven and once in a while Texaco.

5 Q. And just sticking with the time that you  
6 were working at 7-Eleven, would you primarily buy  
7 your cigarettes at 7-Eleven?

8 MS. WALD: Form.

9 THE WITNESS: Both places if I needed.  
10 Then, then, yes, 7-Eleven.

11 BY MS. KENYON:

12 Q. So you would buy your cigarettes from a  
13 smoke shop, and if you needed cigarettes while you  
14 were working, you would buy them at 7-Eleven?

15 A. Yes.

16 Q. What smoke shop did you buy them from?

17 A. Bermuda and Silverado Ranch in plaza.

18 Q. Why did you buy your cigarettes at a smoke  
19 shop as opposed to 7-Eleven?

20 A. I only bought at 7-Eleven when I worked.

21 Q. So why did you buy your cigarettes at a  
22 smoke shop?

23 A. The person was very nice and always had my  
24 brand.

25 Q. What brand was that?

1           A.    I smoked L&M when I moved here. Then hard  
2   to find, so I went to Marlboro.

3           Q.    And the 7-Eleven that you worked at was in  
4   Las Vegas; is that right?

5           A.    Yes.

6           Q.    And you moved to Las Vegas in 1990?

7           A.    Yes.

8           Q.    Did the smoke shop that you went to carry  
9   L&M?

10          A.    I do not remember.

11          Q.    So the Bermuda and Silverado Ranch smoke  
12   shop, what brand did you buy at that smoke shop?

13          A.    I do not remember.

14          Q.    I thought you just said that you went to  
15   the smoke shop because it always had your brand.

16          A.    I do not remember what brand at the time.

17          Q.    You do not remember the brand at the time.  
18   Is that what you're saying?

19          A.    I do not remember, correct.

20          Q.    I'll just rephrase so the record is clear.  
21   So you're trying to say you do not remember the  
22   brand that you were smoking at the time you were  
23   going to Bermuda and Silverado Ranch smoke shop; is  
24   that right? Is that correct?

25          A.    Correct.

1 Q. So you told us you sold cigarettes at  
2 7-Eleven. Did you ever tell anyone that you did not  
3 want to sell cigarettes?

4 A. No.

5 Q. Did you ever complain to anyone about  
6 having to sell cigarettes?

7 A. No.

8 Q. Did you ever tell anyone that you felt  
9 responsible for selling cigarettes to smokers?

10 A. No.

11 Q. Do you think you are responsible for any  
12 smoking-related injuries that one of your customers  
13 got?

14 MS. WALD: Form.

15 THE WITNESS: (Indicating.)

16 BY MS. KENYON:

17 Q. Yes?

18 A. No.

19 Q. Why not?

20 A. Because they said no proof cigarettes were  
21 harmful.

22 Q. Who said that?

23 A. (Indicating.) On the news tobacco  
24 companies said no proof. They lied. I am the proof  
25 it causes cancer.

1 MS. KENYON: Move to strike as  
2 nonresponsive.

3 THE WITNESS: Would have never started if  
4 you, the tobacco company, told the truth.

5 BY MS. KENYON:

6 Q. Based on the information you provided, you  
7 first smoked in 1964 when you were 18 years old; is  
8 that right?

9 A. Yes.

10 Q. The first Surgeon General report on smoking  
11 and health came out in January of 1964 when you were  
12 a senior in high school. Do you recall that?

13 A. No.

14 Q. It was a big deal. It was all over the  
15 news.

16 A. I do not remember.

17 Q. Did it come up in any of your classes in  
18 high school?

19 A. I do not remember. No.

20 Q. Are you familiar with the warnings on the  
21 side of cigarette packs?

22 A. Now I am.

23 Q. Are you aware that in 1966 the first  
24 Surgeon General's warning was placed on every pack  
25 of cigarettes?

1 A. I do not remember.

2 Q. You turned 20 in 1966; is that right?

3 A. Yes.

4 Q. You would have been smoking for about two  
5 years?

6 A. Yes.

7 Q. The 1966 warning said, "Caution: Cigarette  
8 smoking may be hazardous to your health."

9 A. I do not remember.

10 Q. Do you recall seeing that warning?

11 A. No. I do not remember.

12 Q. Is there any reason that you could not have  
13 read and understood that warning in 1966?

14 A. I do not remember. A lot I don't remember.

15 MS. KENYON: We'll go off the record.

16 MS. WALD: Stay on the video.

17 MS. HENNINGER: Over objection. I think we  
18 have a continuing objection.

19 (Off the stenographic record.)

20 THE VIDEOGRAPHER: The time is 11:33, and  
21 we are back on the record.

22 MS. WALD: For the purpose of the record,  
23 Sandra was trying to communicate with Ms. Kenyon  
24 during the break. If the translator -- can you go  
25 ahead and read what was on the board?

1 THE WITNESS: Jen, I did buy Basic at smoke  
2 shop because they were cheaper than Marlboro.

3 BY MS. KENYON:

4 Q. I appreciate that. We will get into that.  
5 I believe you said that you switched from L&M to  
6 Marlboro when you moved to Vegas because they were  
7 hard to find and that is the reason you switched to  
8 Marlboro?

9 A. Yes.

10 Q. When did you first know that cigarettes  
11 could be harmful to your health?

12 A. When I got Stage 4 cancer.

13 Q. You were diagnosed with cancer in 2018; is  
14 that right?

15 A. I do not remember. Four years March.

16 Q. So March of 2022 will be four years if I'm  
17 understanding you correctly; is that right?

18 A. It will be four years in March.

19 Q. So that would mean that you were diagnosed  
20 with cancer in or around March of 2018. Does that  
21 sound right?

22 A. I know nothing about being diagnosed or  
23 operation. Don't remember a thing.

24 Q. That's okay. You're doing great. I know  
25 I'm asking you things that are going back, and

1 you've mentioned a couple times that you don't  
2 remember things. And that's okay.

3 A. Not for me.

4 MS. LUTHER: Let's go off the record.

5 BY MS. KENYON:

6 Q. Do you have problems remembering things  
7 from your childhood?

8 A. Yes.

9 Q. Do you have problems remembering things in  
10 the '60s and '70s?

11 MS. WALD: Object to form.

12 THE WITNESS: I do not remember. Ask me  
13 stuff to see.

14 BY MS. KENYON:

15 Q. And that's fair. I'm just asking because  
16 you have told me a couple times that you have  
17 problems remembering things. So -- you know, that's  
18 okay. So I'm just asking for your best  
19 recollection, what you can remember. Does that  
20 sound good?

21 A. Yes.

22 Q. So I think my question was when did you  
23 first know that cigarettes could be harmful to your  
24 health? And you said when you were diagnosed with  
25 cancer. So you're telling me that the first time

1 you learned that smoking cigarettes could be  
2 dangerous to your health was in 2018?

3 MS. WALD: Object to form.

4 MS. KENYON: For the record she had written  
5 on her white board "No on news."

6 MS. WALD: But then she erased it.

7 It seems like you're a little confused. Do  
8 you want her to restate the question?

9 THE WITNESS: Please repeat the question.

10 MS. KENYON: Can you read my question back?

11 (The question was read.)

12 THE WITNESS: Yes.

13 BY MS. KENYON:

14 Q. What did you learn? How did you learn that  
15 smoking cigarettes could be dangerous to your health  
16 in 2018?

17 A. Because you said in late '80s, early '90s  
18 no proof cigarettes were harmful.

19 Q. Do you recall seeing any news stories in  
20 1999 or 2000 following attorney general lawsuits  
21 with the tobacco companies where the tobacco  
22 companies publicly admitted that smoking caused  
23 disease?

24 MS. WALD: Object to form.

25 ///



1 BY MS. KENYON:

2 Q. I'll ask the question again. Do you recall  
3 news stories in 1999 or 2000 where the tobacco  
4 companies publicly admitted that smoking caused  
5 disease?

6 A. I do not remember.

7 Q. Do you recall the tobacco companies putting  
8 on their websites in 1999 or 2000 --

9 A. I do not remember.

10 Q. -- that admitted smoking caused disease?

11 A. I do not remember.

12 Q. It was a pretty big story on the news.

13 MS. WALD: Object to form.

14 THE WITNESS: I don't remember.

15 MS. WALD: It's okay. It's okay. It's  
16 okay. Sandra, it's okay.

17 MS. HENNINGER: We should take a break.  
18 Off the record.

19 MS. WALD: She's still writing.

20 THE WITNESS: Wish I did.

21 MS. WALD: It's okay, Sandra. There's no  
22 question. There's no question. Just wait for a  
23 question and then answer it. Okay? We can -- let's  
24 just take a breath. We're good? Okay. Remember,  
25 wait for a question, and then you can answer.

1 You're doing great.

2 BY MS. KENYON:

3 Q. So we talked about the warning label that  
4 went on every single pack of cigarettes in 1966. So  
5 from 1966 until you quit smoking, every single pack  
6 of cigarettes you bought had a warning label on it.  
7 Do you recall that?

8 MS. WALD: Remember you have these answers.

9 THE WITNESS: I do not remember.

10 BY MS. KENYON:

11 Q. Do you recall in 1970 the warning label  
12 changed? It changed to -- the warning label in 1970  
13 read "Warning: The Surgeon General has determined  
14 that cigarette smoking is dangerous to your health."

15 A. I do not remember.

16 Q. So the warning label went from "Smoking may  
17 be hazardous" in 1966 to "The Surgeon General has  
18 determined that cigarette smoking is dangerous to  
19 your health." And from 1970 until 1985, every  
20 single pack of cigarettes said, "Surgeon General has  
21 determined that cigarette smoking is dangerous to  
22 your health."

23 A. I do not remember.

24 Q. Is there any reason, if you saw that  
25 warning label, that you could not have read and

1 understood that label?

2 A. Please repeat the question.

3 MS. KENYON: Would you mind reading it  
4 back?

5 MS. WALD: For the record, she's reading it  
6 on the live transcript.

7 THE WITNESS: If I saw it, I would  
8 understand it. But I don't remember.

9 BY MS. KENYON:

10 Q. Do you recall ever seeing a warning on your  
11 pack of cigarettes?

12 A. No.

13 MS. WALD: Form. It's okay.

14 BY MS. KENYON:

15 Q. Did you know they were there?

16 A. I do not remember.

17 Q. Have you had memory issues in your life?

18 A. Never.

19 Q. I'm a little confused because I thought you  
20 told us that you are having some trouble remembering  
21 things and there's a lot that you don't remember.

22 A. (Inaudible response.)

23 MS. LUTHER: We're not getting answers  
24 here.

25 ///

1 BY MS. KENYON:

2 Q. Are you agreeing there's a lot you don't  
3 remember?

4 MS. WALD: Object to form.

5 THE WITNESS: Yes. Correct.

6 BY MS. KENYON:

7 Q. So have you had memory issues in your life?

8 MS. WALD: Object to form. Asked and  
9 answered.

10 THE WITNESS: Not before operation, chemo,  
11 and radiation. Nine weeks.

12 BY MS. KENYON:

13 Q. So are you telling me that you are blaming  
14 memory issues -- strike that.

15 Are you telling me that you had no memory  
16 issues before your operation, chemo, and radiation?

17 A. (Inaudible response.)

18 Q. Are you telling me that you had no memory  
19 issues before your operation?

20 A. I remember everything before operation. I  
21 remember everything before I had operation.

22 Q. So our records show -- strike that.

23 You understand we have collected your  
24 medical records in this case; right?

25 A. Yes.

1 Q. Your medical records show that you had your  
2 operation in 2018. Does that sound right?

3 A. Correct. Okay.

4 Q. So you're telling me you remember  
5 everything before 2018?

6 MS. WALD: Object to form.

7 THE WITNESS: Not now I don't.

8 BY MS. KENYON:

9 Q. I just want to be clear. 2018 was the  
10 first time you learned that smoking could be harmful  
11 to a smoker's health; is that right?

12 MS. WALD: Object to form. Asked and  
13 answered for the third time. I'm going to let  
14 Ms. Camacho answer, but if you're going to continue  
15 to ask the same questions over and over, we're not  
16 going to have that in this deposition. This is  
17 going to be the last time you ask that question.

18 MS. KENYON: With all due respect, can you  
19 limit them to nonspeaking objections? This is a  
20 little bit different question. The record will  
21 accurately reflect that.

22 BY MS. KENYON:

23 Q. Mrs. Camacho, I will repeat my new question  
24 for you. Just to be clear, 2018 was the first time  
25 you learned that smoking could be harmful to a

1 smoker's health; right?

2 MS. WALD: Same objection.

3 THE WITNESS: Only when they said I have  
4 cancer.

5 BY MS. KENYON:

6 Q. Right. So I just want to make sure I  
7 understand. That's the first time you learned that  
8 smoking could be harmful to a smoker's health;  
9 right?

10 MS. WALD: Object to form. Asked and  
11 answered.

12 THE WITNESS: Yes.

13 BY MS. KENYON:

14 Q. You told us that you don't recall your  
15 doctors ever talking to you about quitting smoking,  
16 and we walked through the record from Dr. Atkinson  
17 from 2015 where she told you to quit.

18 A. I do not remember.

19 Q. As I mentioned, we've been collecting your  
20 records. So I'm just going to show you a few.  
21 There are more, but I'm just going to go through a  
22 few records with you.

23 (Exhibit 7 marked.)

24 BY MS. KENYON:

25 Q. I'm handing you what I've marked as Defense

1 Exhibit 7.

2 MS. WALD: Can I have a copy?

3 BY MS. KENYON:

4 Q. Do you see at the top of Exhibit 7 where it  
5 reads "Aloha Medical Center"? Is that a "yes"? Do  
6 you see at the top where it says "Aloha Medical  
7 Center"?

8 A. Yes.

9 Q. And then underneath that, "Camacho,  
10 Sandra." Do you see that, the gray (indicating)?

11 A. Yes.

12 Q. Then it reads "December 30, 2008." Do you  
13 see that?

14 A. Yes.

15 Q. 2008, that's the latest --

16 MS. LUTHER: Earliest.

17 MS. KENYON: Thank you.

18 BY MS. KENYON:

19 Q. 2008, that's the earliest medical record we  
20 have collected from you -- for you. So this record,  
21 December 30, 2008. Do you recall going to an Aloha  
22 Medical Group or Medical Center?

23 A. I do not remember, no.

24 Q. If you could turn to page 3, do you see at  
25 the bottom where it says -- three-fourths of the way

1 down it says --

2 MS. WALD: Page 3.

3 BY MS. KENYON:

4 Q. Right there. "Electronically signed" --

5 I'm telling you right now where to go. Hold on.

6 Page 3. "Electronically signed by Aaron Adaoag,  
7 MD." That's A-d-a-o-a-g. Do you see right there?

8 MS. WALD: Right there (indicating).

9 BY MS. KENYON:

10 Q. Do you remember seeing a Dr. Adaoag?

11 A. I do not remember.

12 Q. Then, if you would look up in this first  
13 paragraph here, do you see the sentence starting  
14 "Advised smoking cessation"? Do you see that?  
15 "Advised smoking cessation." Do you see where I'm  
16 at?

17 A. (Indicating.)

18 Q. I'm going to read that. Do you see where  
19 I'm at? No. "Smoking cessation," right above that.  
20 Are you with me?

21 A. Yes.

22 Q. So Dr. Adaoag wrote in your medical record,  
23 quote, "Advised smoking cessation and discussed  
24 techniques to quit (patch, pill, et cetera).  
25 Patient is precontemplative. Encouraged quit date



1 consideration and follow-up with me to readdress."

2           So in 2008 Dr. Adaoag is telling you to  
3 quit smoking. He discussed techniques on how to  
4 quit smoking. And you told him you were  
5 precontemplative, which means you were not ready to  
6 quit. Do you see where he noted that in your  
7 records?

8           MS. WALD: Object to form.  
9 Mischaracterizes the testimony.

10 BY MS. KENYON:

11 Q. Do you see that in your medical record?

12 A. I do not remember.

13 Q. You're mouthing yes, you see it, but you do  
14 not remember this doctor; is that correct?

15 A. Correct.

16 Q. But you see it, and I'm reading it  
17 correctly from your medical record; correct? Is  
18 that correct?

19 A. Correct.

20           (A discussion was held off the record.)

21           (Exhibit 8 marked.)

22 BY MS. KENYON:

23 Q. I'm handing you what I've marked as Defense  
24 Exhibit 8. Do you see your name here at the top,  
25 "Camacho, Sandra"?

1 A. (Inaudible response.)

2 Q. Can you point?

3 A. Yes.

4 Q. Then across the line it reads "March 29,  
5 2013." Do you see that date?

6 A. Yes.

7 Q. So this is one of your medical records from  
8 March 29, 2013. Do you understand that?

9 A. Yes.

10 Q. And then, again, on the third page, page 3,  
11 "electronically signed." This is another record  
12 from Dr. Adaoag from 2013. So this is five years  
13 later. Do you see that?

14 A. (Inaudible response.)

15 Q. Is that a "yes"?

16 A. Yes.

17 Q. And then in all capitals there's a  
18 paragraph at the bottom there. "I had a very long  
19 discussion regarding her tobacco use and cessation."  
20 Do you see that?

21 A. Yes.

22 Q. So we just looked at a record from 2008  
23 where Dr. Adaoag is telling you to quit smoking.  
24 We're looking at another record five years later in  
25 2013 when he is, again, noting that he had a very

1 long discussion with you regarding your tobacco use  
2 and cessation.

3 A. I do not remember.

4 Q. And do you understand that cessation means  
5 quitting smoking?

6 A. What he said?

7 Q. All I'm asking is do you understand that  
8 the word "cessation," that that means quitting  
9 smoking? Do you understand that?

10 A. (Inaudible response.)

11 Q. You just mouthed "I don't remember."

12 A. I do not remember.

13 Q. And I understand that you don't -- you're  
14 saying you don't remember this record. I'm simply  
15 asking whether you understand that cessation means  
16 to quit smoking.

17 A. I do not know.

18 Q. But you saw in Dr. Adaoag's medical record  
19 for you that he wrote he had a very long discussion  
20 regarding your tobacco use and cessation? You see  
21 that in your record?

22 A. I do not remember.

23 Q. But you see it in your record?

24 A. (Inaudible response.)

25 Q. (Indicating.)

1 A. (Indicating.)

2 Q. You see it in your record; correct?

3 A. Yes.

4 MS. WALD: Wait for a question. Wait for a  
5 question.

6 BY MS. KENYON:

7 Q. Is there something you wanted to say?

8 A. I don't know him.

9 MS. WALD: Sandra, wait for the next  
10 question.

11 BY MS. KENYON:

12 Q. Earlier we were talking about some of the  
13 places that you worked. You mentioned you also  
14 worked at Texaco; is that right?

15 A. Yes.

16 Q. What were your job duties there?

17 A. Cashier.

18 Q. Was that also shift work?

19 A. Yes.

20 Q. What hours -- what were your shifts?

21 A. 6:00 to 2:00. 7:00 to 3:00.

22 Q. Were you allowed to smoke while you worked  
23 at Texaco?

24 A. I do not remember.

25 Q. Do you recall smoking while working at

1 Texaco?

2 A. I do not remember.

3 Q. Do you recall whether you ever got in  
4 trouble for smoking while you worked at Texaco?

5 A. I never got in trouble.

6 Q. Did you ever sell cigarettes while you were  
7 working at Texaco?

8 A. Yes.

9 Q. What brands?

10 A. All.

11 Q. Did that ever influence the brands that you  
12 smoked?

13 A. No.

14 Q. Did you buy cigarettes from Texaco while  
15 you were employed there?

16 A. I do not remember.

17 Q. Did you ever tell anyone that you did not  
18 want to sell cigarettes when you were working at  
19 Texaco?

20 A. No.

21 Q. Did you ever tell anyone that you felt  
22 responsible for selling cigarettes to smokers?

23 A. No.

24 Q. Do you think you are responsible for any  
25 smoking-related illnesses that one of your customers

1 got?

2 MS. WALD: Form.

3 THE WITNESS: No.

4 BY MS. KENYON:

5 Q. Why not?

6 MS. WALD: Form.

7 THE WITNESS: Because you and tobacco  
8 companies lied to all of us.

9 BY MS. KENYON:

10 Q. You told us that you recall something on  
11 the news in the late '80s or '90s that the tobacco  
12 companies said; is that right?

13 A. Yes.

14 Q. So prior to that time, prior to the  
15 late '80s, '90s, had you heard that smoking could be  
16 dangerous to your health?

17 A. No.

18 Q. You don't recall seeing anything prior to  
19 that about smoking being dangerous to your health?

20 MS. WALD: Object to form. Asked and  
21 answered.

22 THE WITNESS: No.

23 BY MS. KENYON:

24 Q. Do you recall when you stopped working at  
25 Texaco?

1 A. All I remember is nine years there.

2 Q. You're not currently working; right?

3 A. No.

4 Q. I do have a question on your interrogatory  
5 responses. I'm handing you what was previously  
6 marked as Defense Exhibit 4. If you could turn to  
7 page 9. Are you there?

8 A. Yes.

9 Q. So right above where it reads  
10 "Interrogatory Number 7," so I'm right there  
11 (indicating). Do you see that? You wrote, "I  
12 retired at some time during 1994, but I do not  
13 remember the exact date." Did I read that  
14 correctly? All I'm asking is if I read that  
15 correctly.

16 A. Yes.

17 Q. So then right above that where you put the  
18 information for Texaco, then you list the address,  
19 job title, rate of pay, and then dates. For the  
20 dates of working at Texaco, you said 1992 to 2000.  
21 But then right below that you said, "I retired in  
22 1994." So I'm just a little confused.

23 You're mouthing "me too." But these are  
24 your interrogatories, so you need to help me  
25 understand what information in here is actually

1 correct.

2 MS. WALD: Don't ask Tony. It's okay.

3 THE WITNESS: I don't remember when I

4 retired.

5 BY MS. KENYON:

6 Q. That's not a problem. We've gone over now

7 a couple of dates in your interrogatory responses.

8 And so I guess I'm just trying to figure out a

9 couple things, where this information even came from

10 and then what information is actually correct.

11 MS. WALD: Is there a question?

12 MS. KENYON: Yeah. There's two.

13 BY MS. KENYON:

14 Q. Where did this information come from?

15 A. Me and Tony.

16 Q. And you provided us with the second amended

17 interrogatory responses on Monday of this week, so

18 November 1st, so two days ago. And are you telling

19 me now that you don't remember where this

20 information came from?

21 MS. WALD: Object to form. Asked and

22 answered. She just answered that it came from her

23 and Tony. And she just mouthed her husband. She

24 mouthed "me and Tony."

25 THE WITNESS: Me and Tony.



1 BY MS. KENYON:

2 Q. But you don't know when you retired then?

3 MS. WALD: Form. Asked and answered.

4 THE WITNESS: No.

5 BY MS. KENYON:

6 Q. Why did you stop working?

7 A. Had spur on foot.

8 Q. Did you see a doctor for that?

9 A. Yes.

10 Q. Do you recall who you saw?

11 A. No. Foot doctor.

12 Q. Do you know what treatment the doctor  
13 recommended?

14 A. Got shot in foot.

15 Q. Like a cortisone shot?

16 A. Yes.

17 Q. Did you ever try to go back to work at any  
18 point?

19 A. No.

20 Q. Did the spur in your foot heal?

21 A. It never goes away, a spur.

22 Q. So you're saying a foot spur never goes  
23 away?

24 MS. WALD: Can you point?

25 ///

1 BY MS. KENYON:

2 Q. Is that correct?

3 A. Correct. Only surgery.

4 Q. Does it still bother you today?

5 A. No.

6 Q. Did your doctor ever tell you the cause of  
7 your foot spur?

8 A. No.

9 Q. Did a doctor ever tell you to lose weight  
10 or to increase your exercise to try to eliminate  
11 some of the pain from the foot spur?

12 A. No.

13 Q. Going back to what we were just talking  
14 about a moment ago, do you remember the tobacco  
15 companies on the news before the late '80s or early  
16 '90s?

17 MS. WALD: Object to form.

18 BY MS. KENYON:

19 Q. Do you recall the tobacco companies on the  
20 news before the late '80s or early '90s?

21 MS. WALD: Write it down.

22 THE WITNESS: Billboard, magazine.

23 BY MS. KENYON:

24 Q. What does that mean?

25 A. I saw cigarette advertising.

1 Q. That's not what I'm asking you. I'm asking  
2 you if you ever saw the tobacco companies on the  
3 news before the late '80s or early '90s.

4 A. I do not remember.

5 Q. Are you done?

6 A. Yes.

7 Q. Have you ever filed a workers' compensation  
8 claim?

9 A. No.

10 Q. Have you otherwise been injured at work?

11 A. No.

12 Q. Are you doing okay?

13 A. (Inaudible response.)

14 Q. You told us you first smoked in 1964 when  
15 you were 18 years old. How did you get that first  
16 cigarette?

17 MS. WALD: Don't scratch. It's bad. I  
18 know it's itchy, but don't scratch. Try not to  
19 scratch. He's getting medicine. Why don't you  
20 repeat the question.

21 MS. KENYON: Can we go off the record?

22 THE VIDEOGRAPHER: The time is 12:23. We  
23 are going off the record.

24 (A break was taken.)

25 THE VIDEOGRAPHER: The time is 12:35. We

1 are going back on the record.

2 BY MS. KENYON:

3 Q. Mrs. Camacho, we're back. Are you ready to  
4 go?

5 A. Yes.

6 Q. Are you feeling okay?

7 A. Yes.

8 Q. So right before we took a break, I'd asked  
9 you to -- how did you get your first cigarette?

10 A. My girlfriend.

11 Q. Do you recall her name?

12 A. No.

13 Q. Do you know what brand the first cigarette  
14 was?

15 A. L&M.

16 Q. Why did you choose that brand?

17 A. Because I thought they were safe.

18 Q. Where did you get that information?

19 A. I saw billboards, magazines, and I wanted  
20 filter cigarettes. I thought they were safer than  
21 nonfilter I thought it was.

22 Q. And I'm asking about the very first  
23 cigarette you smoked. So did you ever -- so the  
24 very first cigarette you smoked was a filtered  
25 cigarette; is that right?

1 A. Yes.

2 Q. Did you ever smoke an unfiltered cigarette?

3 A. Tried it. Didn't like.

4 Q. What did you not like about an unfiltered  
5 cigarette?

6 A. The tobacco stuck in my mouth.

7 Q. Do you remember the brand of unfiltered  
8 cigarette you smoked?

9 A. No.

10 Q. Do you recall when you tried an unfiltered  
11 cigarette?

12 A. The other girl smoked, and I took a puff of  
13 hers. Nonfilter.

14 Q. Is this the same girl you were referring to  
15 earlier? Is this the girlfriend that you had your  
16 first cigarette with?

17 A. There were three or four girls.

18 Q. Three or four girls when you had your very  
19 first cigarette?

20 MS. WALD: Point.

21 THE WITNESS: Yes.

22 BY MS. KENYON:

23 Q. I want to go back to that, but I want to  
24 ask you some questions about what you just said  
25 about L&M. You said that --

1 MS. WALD: Erase the whiteboards.

2 BY MS. KENYON:

3 Q. You said that you did not like the  
4 unfiltered cigarette because you got tobacco on your  
5 lips; is that right?

6 MS. WALD: Object to form.

7 Mischaracterizes the testimony. She said "mouth."

8 THE WITNESS: Yes.

9 BY MS. KENYON:

10 Q. And because you did not like the tobacco  
11 from the unfiltered cigarette on your mouth, you  
12 smoked a filtered cigarette.

13 A. (Inaudible response.)

14 MS. WALD: Wait for the question.

15 BY MS. KENYON:

16 Q. You're mouthing "taste"?

17 MS. WALD: Write it down. Write it down.

18 THE WITNESS: Didn't like the taste.

19 Nonfilter.

20 BY MS. KENYON:

21 Q. So is the very first cigarette you smoked,  
22 was it an unfiltered cigarette?

23 A. No.

24 Q. So where did you get the first cigarette  
25 that you smoked?

1 MS. WALD: Form. Asked and answered.

2 MS. KENYON: Just so the record is clear,  
3 she's changing her testimony.

4 MS. WALD: The record is perfectly clear,  
5 and she has not changed her testimony.

6 THE WITNESS: From my girlfriend.

7 BY MS. KENYON:

8 Q. And what brand did your girlfriend give  
9 you?

10 MS. WALD: Object to form. Asked and  
11 answered.

12 THE WITNESS: L&M.

13 BY MS. KENYON:

14 Q. What was your reaction to smoking the first  
15 cigarette?

16 A. I cough.

17 Q. Did you like it?

18 MS. WALD: Form.

19 THE WITNESS: No.

20 BY MS. KENYON:

21 Q. So you said you smoked L&M because you  
22 thought it was safer?

23 A. Yes.

24 Q. Safer in what way?

25 A. Less nicotine.

1 Q. So when you started smoking in 1964, you  
2 smoked a filtered L&M cigarette because you thought  
3 it would be safer to get less nicotine; is that  
4 right?

5 A. Please repeat the question.

6 MS. KENYON: Would you read that back?

7 (The question was read.)

8 THE WITNESS: Did not like open cigarette  
9 without filter.

10 BY MS. KENYON:

11 Q. Right. So what I'm trying to understand,  
12 did you smoke a filtered cigarette because you  
13 thought it was safer or because you didn't like an  
14 unfiltered cigarette?

15 MS. WALD: Object to form.

16 Mischaracterizes testimony. Asked and answered.  
17 Compound.

18 MS. KENYON: You can just object to form.

19 BY MS. KENYON:

20 Q. You can answer.

21 A. Please repeat the question.

22 MS. KENYON: Can you read back the  
23 question?

24 (The question was read.)

25 MS. WALD: Same objection.



1 THE WITNESS: Both.

2 BY MS. KENYON:

3 Q. Why in 1964 did you think it was safer to  
4 get less nicotine?

5 A. Because it was filtered.

6 Q. But that's not -- my question is a little  
7 bit different.

8 Why did you think it was safer to get less  
9 nicotine?

10 A. Because it was filtered. I thought the  
11 filtered cigarette was safer for me.

12 Q. You thought that in 1964?

13 MS. WALD: Object to form. Asked and  
14 answered.

15 THE WITNESS: (Inaudible response.)

16 BY MS. KENYON:

17 Q. You thought that in 1964?

18 MS. WALD: Same objection.

19 THE WITNESS: When I tried both cigarettes,  
20 yes.

21 BY MS. KENYON:

22 Q. Where did you get that information?

23 MS. WALD: Object to form. Asked and  
24 answered.

25 THE WITNESS: I thought it.

1 BY MS. KENYON:

2 Q. So by 1964 you knew that unfiltered  
3 cigarettes were harmful to your health?

4 MS. WALD: Object to form.  
5 Mischaracterizes testimony.

6 THE WITNESS: I myself thought filter was  
7 safer.

8 BY MS. KENYON:

9 Q. So when you made the decision to smoke  
10 filtered cigarettes because you thought they were  
11 safer, you were aware by that point that unfiltered  
12 cigarettes were harmful to your health?

13 MS. WALD: Form. Asked and answered.  
14 Mischaracterizes the testimony.

15 THE WITNESS: No.

16 BY MS. KENYON:

17 Q. You've always smoked a filtered cigarette;  
18 right?

19 A. Yes.

20 Q. Because you thought they were safer for  
21 you. Yes?

22 A. Yes.

23 Q. Since the first time you smoked, you were  
24 always concerned about lowering the harm caused by  
25 smoking; right?

1 MS. WALD: Form. Argumentative.

2 Mischaracterizes testimony.

3 THE WITNESS: Please repeat the question.

4 BY MS. KENYON:

5 Q. Since the first time you smoked, you have  
6 always been concerned about lowering the harm caused  
7 by smoking; is that right?

8 MS. WALD: Point to an answer.

9 THE WITNESS: No.

10 BY MS. KENYON:

11 Q. You said that you coughed after your first  
12 cigarette. Considering how you reacted, when did  
13 you smoke your second cigarette?

14 A. Right after first one.

15 Q. Why did you try another one?

16 A. I wanted it.

17 Q. What brand was your second cigarette?

18 A. L&M.

19 Q. Where did you get your second cigarette?

20 A. Girlfriend.

21 Q. Do you recall her name?

22 A. No.

23 Q. How many years later did you become a  
24 regular smoker?

25 MS. WALD: Object to form.

1 Mischaracterizes testimony. Speculation. And she  
2 never said it was years later.

3 THE WITNESS: Right after the first  
4 cigarette.

5 BY MS. KENYON:

6 Q. Right after your first cigarette you  
7 started smoking every single day?

8 A. Yes.

9 Q. How long until you were smoking a pack a  
10 day?

11 A. I do not remember.

12 Q. How much were you smoking when you became a  
13 regular smoker?

14 A. One to two packs a day.

15 Q. Well, you didn't immediately go from  
16 smoking zero to smoking one to two packs a day, did  
17 you?

18 MS. WALD: Object to form.

19 THE WITNESS: One pack. Then wanted more.  
20 Went to two packs.

21 BY MS. KENYON:

22 Q. When did you start buying your own  
23 cigarettes?

24 A. I do not remember.

25 Q. How did you pay for your cigarettes?

1 A. My girlfriend and allowance.

2 Q. So are you saying your girlfriend gave you  
3 cigarettes to smoke?

4 A. Yes.

5 Q. How many cigarettes would she give you to  
6 smoke in a day?

7 A. I do not remember.

8 Q. How much was your allowance?

9 MS. WALD: Wipe the board.

10 THE WITNESS: I do not remember.

11 BY MS. KENYON:

12 Q. Do you know how much a pack of cigarettes  
13 cost in 1964?

14 A. No. I do not remember.

15 MS. WALD: It's okay. Wait for a question.

16 BY MS. KENYON:

17 Q. When you started smoking, did you hide it  
18 from your parents?

19 A. At first.

20 Q. Why?

21 A. Don't know.

22 Q. Did your parents ever catch you smoking?

23 A. No.

24 Q. Did your parents at some point find out  
25 that you were smoking?

1 A. Yes.

2 Q. How did they find out?

3 A. I told them.

4 Q. Did they approve of you smoking?

5 A. Yes.

6 Q. What did they say when they found out you  
7 were smoking?

8 MS. WALD: Point.

9 THE WITNESS: I don't remember.

10 BY MS. KENYON:

11 Q. How is it that you remember that they  
12 approved of your smoking?

13 MS. WALD: Write it down.

14 THE WITNESS: I told them I smoked.

15 BY MS. KENYON:

16 Q. Right. I understand that. When you told  
17 them you smoked, what did they say?

18 MS. WALD: Point to it.

19 THE WITNESS: I do not remember.

20 BY MS. KENYON:

21 Q. Do you recall whether they approved or  
22 disapproved of you smoking?

23 A. No.

24 Q. You don't recall?

25 A. (Inaudible response.)

1 MS. WALD: Form. Asked and answered.

2 MS. KENYON: She was mouthing "I don't  
3 remember."

4 BY MS. KENYON:

5 Q. Are you saying you don't remember?

6 A. Please repeat the question.

7 MS. KENYON: Can you read back my question?

8 (The question and answer were read.)

9 THE WITNESS: I do not remember.

10 BY MS. KENYON:

11 Q. You just mouthed "I know I told them." So  
12 is the fact that you told them, is that all you  
13 recall?

14 MS. WALD: Write it down.

15 THE WITNESS: All I remember.

16 BY MS. KENYON:

17 Q. Just so the record is clear, all you  
18 remember is that you told your parents you were  
19 smoking; correct?

20 MS. WALD: Form.

21 THE WITNESS: Yes.

22 BY MS. KENYON:

23 Q. Did you smoke in front of them?

24 A. I do not remember.

25 Q. Did you smoke in their home?

1 A. I do not remember.

2 Q. Did they allow smoking inside their home?

3 A. I don't know.

4 Q. Did you ever smoke in their home?

5 MS. WALD: Object to form. Asked and  
6 answered.

7 THE WITNESS: I do not remember.

8 BY MS. KENYON:

9 Q. You mentioned that your father smoked Lucky  
10 Strikes. Were those filtered or unfiltered?

11 A. Unfilter.

12 Q. Did you ever smoke one of his Lucky  
13 Strikes?

14 A. No.

15 Q. Did your father always smoke an unfiltered  
16 Lucky Strike?

17 A. Yes.

18 Q. Your mother smoked Pall Mall. Was it  
19 filtered or unfiltered?

20 A. Unfilter.

21 Q. Did you ever smoke one of her Pall Mall  
22 cigarettes?

23 A. No.

24 Q. You said that the first brand that you  
25 smoked was L&M. You said you started smoking L&M in



1 1964. How long did you smoke L&M for?

2 A. Till I moved here. Hard to find L&M.

3 Q. Can you -- did you smoke any other brands  
4 from 1964 until you moved to Vegas in 1990?

5 A. No.

6 Q. Can you describe what the pack of L&Ms  
7 looks like?

8 A. Red and white.

9 Q. Do you recall any writing or pictures on  
10 the pack of the L&M?

11 A. I do not remember.

12 Q. Was it menthol or regular?

13 A. Regular.

14 Q. Were they regular length, or were they  
15 longer cigarettes?

16 A. Regular length.

17 Q. Can you describe what the actual cigarette  
18 looks like? The actual L&M cigarette, can you  
19 describe what it looked like?

20 A. White.

21 Q. And if you ran out of an L&M, would you  
22 smoke someone else's cigarette?

23 A. Never ran out.

24 Q. You told us earlier that you switched to  
25 Marlboro when you moved to Vegas because the L&M was

1 hard to find. Can you tell me what the pack of  
2 Marlboro looked like?

3 A. Red and white I think.

4 Q. Do you recall any markings or any words or  
5 anything on the Marlboro cigarette pack?

6 A. No.

7 Q. Were they menthol or regular?

8 A. Regular.

9 Q. And can you describe for me what the  
10 cigarette, what the Marlboro cigarette looked like?

11 A. White.

12 Q. The whole cigarette, you just recall it  
13 being white?

14 A. I do not remember.

15 Q. How long did you smoke Marlboro?

16 A. Until they got expensive.

17 Q. And then what did you switch to? What  
18 brand did you switch to?

19 A. Basic.

20 Q. So at some point when the Marlboro got too  
21 expensive, you switched to Basic cigarettes; is that  
22 right?

23 A. Yes.

24 Q. That's the -- strike that.

25 On the Marlboro, I think you already told

1 us you only smoked it filtered. So was the Marlboro  
2 a filtered cigarette?

3 A. Yes.

4 Q. Why did you smoke the Marlboro filtered  
5 cigarette?

6 A. Couldn't find L&M.

7 MS. WALD: We're not cold. It's okay. Are  
8 you cold? You have a jacket.

9 BY MS. KENYON:

10 Q. Besides being less expensive, is there any  
11 other reason you switched from Marlboro to Basic?

12 A. No.

13 Q. So I want to talk about the Basic  
14 cigarettes a little bit as well. How long did you  
15 smoke Basic cigarettes?

16 A. Till I was told I had cancer.

17 Q. Just so I'm clear, the information we  
18 have -- the information that you provided us shows  
19 that you quit in 2017 and that you were diagnosed  
20 with cancer in 2018.

21 MS. WALD: Write it down. Write it down.

22 THE WITNESS: Had no choice. I had to stop  
23 after biopsy showed cancer.

24 BY MS. KENYON:

25 Q. Do you know when that was?

1           A.    I do not remember.

2                   (Exhibit 9 marked.)

3   BY MS. KENYON:

4           Q.    I'll hand you what I've marked as Defense  
5   Exhibit 9.

6                   MS. LUTHER:   Jen, if we could get to a good  
7   stopping point soon, I would appreciate that.

8   BY MS. KENYON:

9           Q.    At the top of Defense Exhibit 9, it says  
10   "Pulmonary Associates."   Do you see that?   Then date  
11   "April 4, 2018."   Do you see that?

12                   MS. WALD:   Point.

13   BY MS. KENYON:

14           Q.    April 4, 2018.

15           A.    Yes.

16           Q.    "Last name, Camacho; first name, Sandra."  
17   Do you see that?

18           A.    Yes.

19           Q.    Is this your handwriting?

20           A.    I do not remember.

21           Q.    You don't know if this questionnaire is  
22   your handwriting?

23           A.    No.

24           Q.    If you would turn to the third page for me,  
25   it says, "Have you smoked cigarettes?"   Do you see

1 that halfway down the page on the right-hand side?

2 "Have you smoked cigarettes?" Do you see that?

3 A. Yes.

4 Q. And you or someone checked "Yes." Do you  
5 see that?

6 A. No -- yes.

7 Q. Yes, you see that. And "If you do not  
8 smoke now, when did you stop?" Do you see that, the  
9 very last line? The very last line, "If you do not  
10 smoke now, when did you stop?" Do you see that?

11 A. (Inaudible response.)

12 Q. Is that a "yes"?

13 A. Yes.

14 Q. And someone wrote, "September 2017." Do  
15 you see that?

16 A. Yes.

17 MS. WALD: Object to form. It might say  
18 "18."

19 MS. KENYON: No, it does not because the  
20 record is April 2018, so September 2018 hasn't  
21 occurred yet. So it can't be September 2018.

22 MS. WALD: It's okay. It's okay. The  
23 record will speak for itself. Don't worry.

24 BY MS. KENYON:

25 Q. Yes, the record does speak for itself.

1 Just so the record is clear, this record is dated  
2 April 4, 2018. April comes before September in the  
3 months of the year, so September 2018 has not  
4 occurred yet in time in 2018. And the record here  
5 someone wrote September 2017 is when you stopped  
6 smoking.

7 MS. WALD: I'll object to counsel  
8 testifying right now. The record will speak for  
9 itself, and we do not need the attorneys in this  
10 case to be speculating and testifying for the  
11 deponent.

12 MS. HENNINGER: I thought she was just  
13 reading a document.

14 MS. KENYON: I'm reading a document, and  
15 it's not speculation if it's written in a document.  
16 It's actually the opposite of speculation. But  
17 that's neither here nor there.

18 BY MS. KENYON:

19 Q. Do you see on this record from April 4,  
20 2018, where someone wrote, "If you do not smoke now,  
21 when did you stop?" And someone wrote  
22 "September 2017." Do you see that? All I'm asking  
23 is if you can see that in your medical record. Do  
24 you see that in your medical record? Whatever  
25 you're about to write is going to be unresponsive.

1 MS. WALD: Objection. She's going to be  
2 answering the questions, and she can write whatever  
3 she wants to.

4 THE WITNESS: Looks like 2018.

5 MS. KENYON: The record will speak for  
6 itself. September 2018 has not occurred yet.

7 THE WITNESS: (Indicating.)

8 BY MS. KENYON:

9 Q. My point is that the record on the first  
10 page, here -- look. I will show you. At the top do  
11 you see where it says "April 4, 2018"?

12 A. (Inaudible response.)

13 Q. So this medical record is dated April 2018.  
14 Do you understand that?

15 A. Yes.

16 Q. Do you understand that April is before  
17 September in the months of the year?

18 A. Yes.

19 Q. So if this record is from April of 2018, we  
20 have not gotten in September 2018 in this year. Do  
21 you understand that?

22 A. Whatever.

23 MS. LUTHER: I think that's a perfect time  
24 to stop.

25 MS. KENYON: Let's go off the record.

1 MS. WALD: As of my calculations, it seems  
2 like we've been going now for two days. We're about  
3 six hours and nine minutes into this deposition. As  
4 all counsel know, there's a seven-hour presumptive  
5 time limitation in Nevada for depositions. So  
6 there's a little bit less than --

7 No, Sandra, don't write anything else.  
8 We're not going anymore today.

9 There's a little bit less than one hour  
10 remaining for the deposition. There's been many  
11 questions throughout the last two days that have  
12 been asked and answered. I just want to put this on  
13 the record that if there's going to be argument  
14 later that multiple times throughout this deposition  
15 both yesterday and today and for the six hours and  
16 nine minutes, there's been many occasions that we  
17 could have short-circuited and expedited this  
18 deposition if we didn't go over the same questions.  
19 I just want to put that on the record and we can  
20 talk offline.

21 MS. KENYON: I'd also like to note on the  
22 record that we had to stop multiple times. I had to  
23 slow down as I was asked repeatedly to slow down,  
24 and I did. Several questions took minutes to even  
25 get an initial response to cutting into our time.



1 She changed her testimony several times, which is  
2 why the same question might have been asked before.  
3 But if a different answer is given or she changes  
4 her testimony, that necessitates me having to go  
5 back to reask a question so that we have a clean  
6 record.

7 And this -- I mean, frankly the fact you  
8 even had to make that record is kind of ridiculous  
9 when we have talked a lot offline about how you knew  
10 this was going to go over the presumptive seven  
11 minutes --

12 MS. LUTHER: Seven hours.

13 MS. KENYON: Seven hours. Are you now  
14 saying you're going to cut us off at seven hours?

15 MS. WALD: I'm just putting the exact time  
16 on the record right now. I know in other cases we  
17 have agreed to two additional hours -- or three  
18 additional hours to a nine-hour. You and I have not  
19 had that discussion. I'm happy and open to having  
20 that discussion. I want to put that on the record  
21 right now what time limit we are at.

22 My client has not changed her testimony,  
23 and that is going to be clear from the record.  
24 We're not going to be basing this on attorneys  
25 speculating whether or not she changed her answers.

1 I'm just putting on the record right now that we  
2 have been going around six hours and nine minutes.  
3 Although there is a presumptive seven-hour limit, in  
4 other cases we have agreed to nine hours. I'm happy  
5 to come to the same agreement in this case. We can  
6 talk offline.

7 As far as my client taking a little bit of  
8 time to answer questions, as we all know, we're in a  
9 very unique situation right now. My client is  
10 severely disabled. She does not have a voice box.  
11 She has a hole in her throat. She has a difficult  
12 time hearing and seeing. So we are going to give  
13 her the time that she needs to answer any question,  
14 and I appreciate you-all have been very respectful  
15 of that. But the fact that maybe it does take a  
16 little bit longer to answer questions, she has  
17 answered everything to the best of her ability.  
18 That has not in any way slowed down this deposition.

19 But I'm happy to work with you-all as I  
20 always am throughout this and come up with a  
21 reasonable limitation. If not, we can go to the  
22 Court.

23 MS. KENYON: I just have two more comments.  
24 So for you to say that the way that she has  
25 responded has not slowed down this deposition

1 proceeding is completely inaccurate to put on the  
2 record because it 100 percent has slowed this down.  
3 And I'm not saying it's her fault, my fault, your  
4 fault. It's not anyone's fault. It's just the  
5 situation.

6 And, frankly, for you to say that we  
7 haven't had conversations is just disingenuous  
8 because you and I have had two conversations on the  
9 phone where we talked about needing nine to ten  
10 hours. And you -- we have previously talked about  
11 that, so that's completely disingenuous to say you  
12 haven't talked to me about it. Frankly, I -- you  
13 know, it is what it is. We can talk offline and  
14 figure it out. We'll take what we need to to the  
15 Court. That's all. We can go off the record.

16 MS. WALD: No. We're going to stay on the  
17 record. Respectfully, we have talked about it.  
18 I've already cleared my schedule. We have two  
19 additional dates in December for these continued  
20 depositions under the circumstance that we would  
21 have to go on. We did not come to an agreement  
22 specifically as to nine hours or ten hours. We have  
23 had previous conversations that this will be going  
24 beyond the seven hours per the one ruling that we  
25 have from the Court in Geiss. We did not talk about

1 any specific time limitation. That's all I'm  
2 saying. That's why I wanted to put on the record  
3 the amount of time we've been going so far.

4 MR. JACKSON: Thankfully we have a  
5 videotape of how things proceeded. That's fine.

6 MS. LUTHER: There are two other defendants  
7 in this case that need to ask questions. Granted we  
8 won't be retreading what's already been covered.  
9 But under the circumstances, normally you know I  
10 don't ask questions. But this is a different case  
11 than most of the Liggett cases, so I will have  
12 questions in this case.

13 MS. WALD: I understand. But there's still  
14 the presumptive seven-hour limit. Again, I'm always  
15 willing to work with you-all and you know that. And  
16 as long as it is fair and reasonable. We just have  
17 not come to a specific time yet. We already are  
18 allowing our client and putting her up for continued  
19 depositions in December. We have two dates set  
20 aside. We will speak off the record. We wanted to  
21 see how this deposition went. If we can't agree  
22 upon an additional time limitation, we have plenty  
23 of time to go in front of a judge.

24 MS. LUTHER: Agreed.

25 MR. JACKSON: Agreed.

1 THE VIDEOGRAPHER: That concludes today's  
2 deposition of Sandra Camacho, which is Volume II.  
3 The time is 1:29 p.m.

4 THE COURT REPORTER: How about reading and  
5 signing?

6 MS. WALD: She's definitely reading and  
7 signing.

8 THE COURT REPORTER: Would you like a copy?

9 MS. WALD: Yes, please.

10 MS. LUTHER: I need a copy separate and  
11 apart.

12 (Exhibit 10 marked.)

13 (Proceedings concluded at 1:30 p.m.)

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## 1 CERTIFICATE OF REPORTER

2 STATE OF NEVADA )  
 )SS  
3 COUNTY OF CLARK )

4 I, Holly Larsen, a duly certified court reporter  
5 licensed in and for the State of Nevada, do hereby  
6 certify:

7 That I reported the taking of the  
8 deposition of the witness, Sandra Camacho, at the  
9 time and place aforesaid;

10 That prior to being examined, the witness was by  
11 me duly sworn to testify to the truth, the whole  
12 truth, and nothing but the truth;

13 That I thereafter transcribed my shorthand  
14 notes into typewriting and that the typewritten  
15 transcript of said deposition is a complete, true,  
16 and accurate record of testimony provided by the  
17 witness at said time to the best of my ability.

18 I further certify (1) that I am not a  
19 relative or employee of counsel of any of the  
20 parties; nor a relative or employee of the parties  
21 involved in said action; nor a person financially  
22 interested in the action; nor do I have any other  
23 relationship with any of the parties or with counsel  
24 of any of the parties involved in the action that  
25 may reasonably cause my impartiality to be  
questioned; and (2) that transcript review pursuant  
to NRCP 30(e) was requested.

IN WITNESS HEREOF, I have hereunto set my  
hand in the County of Clark, State of Nevada, this  
14th day of November, 2021.

*Holly Larsen*

HOLLY LARSEN, CCR NO. 680

## ERRATA SHEET

1

2

3 I declare under penalty of perjury that I have read  
4 the foregoing \_\_\_\_\_ pages of my testimony, taken on  
5 \_\_\_\_\_ (date) at \_\_\_\_\_ (city),  
6 \_\_\_\_\_ (state), and that the same is a true  
7 record of the testimony given by me at the time and  
8 place herein above set forth, with the following  
9 exceptions:

10

11	Page	Line	Should read:	Reason for change:
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1

DISTRICT COURT

2

CLARK COUNTY, NEVADA

3

SANDRA CAMACHO, )  
individually, and ANTHONY )

4

CAMACHO, individually, ) CASE NO.:  
A-19-807650-C

5

Plaintiffs, )

6

vs. )

7

PHILIP MORRIS USA INC., a )  
foreign corporation; R. )

8

J. REYNOLDS TOBACCO )

9

COMPANY, a foreign ) DEPOSITION OF  
corporation, ) SANDRA CAMACHO  
individually, and as ) VOL. III

10

successor-by-merger to )

LORILLARD TOBACCO COMPANY )

11

and as )

successor-in-interest to )

12

the United States tobacco )

business of BROWN &amp; )

13

WILLIAMSON TOBACCO )

CORPORATION, which is the )

14

successor-by-merger to )

THE AMERICAN TOBACCO )

15

COMPANY; LIGGETT GROUP, )

LLC, a foreign )

16

corporation; ASM )

NATIONWIDE CORPORATION )

17

d/b/a SILVERADO SMOKES &amp; )

CIGARS, a domestic )

18

corporation; and LV )

SINGHS INC. d/b/a SMOKES )

19

&amp; VAPORS, a domestic ) DEPOSITION OF

corporation; DOES I-X; )

20

and ROE BUSINESS ENTITIES ) SANDRA CAMACHO

XI-XX, inclusive, )

21

VOLUME III

Defendants. )

22

23

Taken on Tuesday, December 7, 2021

At 9:06 a.m.

24

Las Vegas, Nevada

25

Reported By: Karen L. Jones, CCR NO. 694

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VIDEOTAPED DEPOSITION OF SANDRA CAMACHO

8

VOLUME III

9

Taken on Tuesday, December 7, 2021

10

Through a translator

11

By a Certified Stenographer

12

At 9:06 a.m.

13

At 531 Morning Mauve Avenue

14

Las Vegas, Nevada

15

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21

22

23

24 Reported By: Karen L. Jones, CCR NO. 694

25

1 APPEARANCES:

2 For the Plaintiffs:

3 KELLEY UUSTAL  
4 BY: KIMBERLY L. WALD, ESQ.  
5 500 North Federal Highway, Suite 200  
Fort Lauderdale, Florida 33301  
954.522.6601

6 For Philip Morris USA Inc.:

7 SHOOK, HARDY & BACON L.L.P.  
8 BY: JENNIFER KENYON, ESQ.  
9 2555 Grand Boulevard  
Kansas City, Missouri 64108  
816.474.6550

10 For Liggett Group, LLC:

11 KASOWITZ BENSON TORRES LLP  
12 BY: KELLY ANNE LUTHER, ESQ.  
13 1441 Brickell Avenue, Suite 1420  
Miami, Florida 33131  
786.587.1045

14 For R. J. Reynolds Tobacco Company:

15 KING & SPALDING  
16 BY: URSULA M. HENNINGER, ESQ.  
17 300 South Tryon Street, Suite 1700  
Charlotte, North Carolina 28202  
704.503.2631

18

19

Also Present:

20

21 Gian Sapienza, Legal Videographer  
22 Dwayne Parrette, Translator/Reader  
Anthony Camacho

23

24

25



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4 BY: Ms. Kenyon 190

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1 P R O C E E D I N G S

2 \* \* \* \* \*

3 THE VIDEOGRAPHER: This begins the video  
4 recorded deposition of Sandra Camacho Volume III  
5 taken Tuesday, December 7th, 2021, at 9:06 a.m. The  
6 deposition is being held at 531 Morning Mauve  
7 Avenue, Las Vegas, Nevada 89183, titled Sandra  
8 Camacho and Anthony Camacho versus Philip Morris et  
9 al., in the District Court, Clark County, Nevada,  
10 Case Number A-19-807650-C.

11 My name is Gian Sapienza with Certified  
12 Legal Videography. The court reporter is Karen  
13 Jones with Oasis Reporting Services.

14 Will the attorneys please state your  
15 name and affiliation for the record.

16 MS. WALD: Kimberly Wald from Kelley  
17 Uustal on behalf of the Plaintiff Sandra Camacho.

18 MS. KENYON: Jennifer Kenyon on behalf  
19 of Philip Morris USA.

20 MS. HENNINGER: Ursula Henninger on  
21 behalf of R. J. Reynolds Tobacco Company.

22 MS. LUTHER: Kelly Luther on behalf of  
23 Liggett Group, LLC.

24 THE VIDEOGRAPHER: Thank you. The court  
25 reporter will now administer the oath.

1 (The translator was sworn.)

2 Whereupon,

3 SANDRA CAMACHO,

4 having been first duly sworn to testify to the  
5 truth, was examined, and testified as follows:

6

7 EXAMINATION

8 BY MS. KENYON:

9 Q. Good morning, Mrs. Camacho. How are  
10 you? Are you okay?

11 A. Okay.

12 Q. Can you hear me okay?

13 A. Yes.

14 Q. We were here in your home a few weeks  
15 ago for your deposition. The same procedures that  
16 were in place a few weeks ago are going to be --  
17 still be in place for the deposition today.

18 Do you understand that?

19 A. Yes.

20 Q. So you have your answer sheets in front  
21 of you that your -- have eight to nine answers that  
22 you can point to or you have your white board in  
23 front of you.

24 Do you understand?

25 A. Yes.

1 Q. Let me know if at any time you can't  
2 hear me. Sound good?

3 A. Yes.

4 Q. If you don't understand any of my  
5 questions, just let me know. Does that sound good?

6 A. Okay.

7 Q. If you need a break, let me know.

8 A. Okay.

9 Q. You understand that you're under oath  
10 again today?

11 A. Yes.

12 Q. Is there anything that might affect your  
13 ability to understand my questions and answer those  
14 questions today?

15 A. No.

16 Q. Anything that prevents you from giving  
17 accurate testimony today?

18 A. No.

19 Q. So last time you were here, we were  
20 talking a little bit about your smoking history.

21 Do you remember that?

22 A. Yes.

23 Q. Have you ever received free cigarettes?

24 A. No.

25 Q. Have you ever received free samples of

1 cigarettes?

2 A. No.

3 Q. You told us that you bought cigarettes  
4 from 7-Eleven and Texaco when you were working  
5 there, and at a smoke shop; is that right?

6 A. Yes.

7 Q. Is that Silverado Smokes & Cigars?

8 A. Yes.

9 Q. Did you ever purchase cigarettes  
10 anywhere else?

11 A. No.

12 Q. Are you aware that you have sued  
13 Silverado Smokes & Cigars?

14 A. Yes.

15 Q. Why did you not sue all of the stores  
16 where you worked and purchased cigarettes like  
17 7-Eleven and Texaco?

18 MS. WALD: And I'm instructing my client  
19 not to answer based on attorney-client privilege.

20 Don't answer.

21 BY MS. KENYON:

22 Q. You agree that it's legal to sell  
23 cigarettes in the U.S.?

24 A. I guess so.

25 Q. Silverado Smokes & Cigars is not

1 breaking any laws by selling cigarettes, correct?

2 MS. WALD: Form.

3 THE WITNESS: I do not know.

4 BY MS. KENYON:

5 Q. You understand it's legal to purchase  
6 cigarettes in the United States?

7 MS. WALD: Object to form. Asked and  
8 answered.

9 BY MS. KENYON:

10 Q. Correct? Did you answer?

11 A. No.

12 MS. WALD: Do you understand what's  
13 going on? Okay. Can you repeat the question?

14 (The record is read by the reporter.)

15 MS. WALD: Point to an answer.

16 THE WITNESS: Yes.

17 BY MS. KENYON:

18 Q. And you understand that it's legal to  
19 sell cigarettes in the United States, correct?

20 MS. WALD: Object to form. Asked and  
21 answered.

22 BY MS. KENYON:

23 Q. You agree that it's legal to sell  
24 cigarettes in the United States, correct?

25 MS. WALD: Point to an answer.

1 THE WITNESS: Yes.

2 BY MS. KENYON:

3 Q. What did Silverado Smokes & Cigars do  
4 that was wrong, in your opinion?

5 MS. WALD: Form.

6 THE WITNESS: They sold them to me.

7 BY MS. KENYON:

8 Q. What did Silverado Smokes & Cigars do  
9 differently than you when you sold cigarettes at  
10 7-Eleven?

11 MS. WALD: Objection.

12 THE WITNESS: I do not know.

13 BY MS. KENYON:

14 Q. What did Silverado Smokes & Cigars do  
15 differently than you when you sold cigarettes while  
16 you were working at Texaco?

17 MS. WALD: Objection.

18 THE WITNESS: I do not know.

19 BY MS. KENYON:

20 Q. Why should they be liable for selling  
21 cigarettes but not you?

22 MS. WALD: Objection.

23 THE WITNESS: I do not know.

24 BY MS. KENYON:

25 Q. Do you think you should be liable for

1 selling cigarettes?

2 MS. WALD: Objection.

3 THE WITNESS: I do not know. I do not  
4 remember.

5 BY MS. KENYON:

6 Q. When did you first purchase cigarettes  
7 at Silverado Smokes & Cigars?

8 A. In the '90s sometime.

9 Q. When did you last purchase cigarettes at  
10 Silverado Smokes & Cigars?

11 MS. WALD: Write it down.

12 THE WITNESS: When I got cancer.

13 BY MS. KENYON:

14 Q. Were the employees at Silverado Smokes &  
15 Cigars always courteous and professional from what  
16 you observed?

17 A. It was only him that I remember.

18 Q. Who are you referring to?

19 A. Owner.

20 Q. Do you recall the owner's name?

21 A. I do not remember.

22 Q. Was the owner of Silverado Smokes &  
23 Cigars always courteous and professional from what  
24 you observed?

25 A. Yes.



1 Q. You smoked for over 20 years before you  
2 started buying cigarettes at Silverado Smokes &  
3 Cigars, correct?

4 A. Yes.

5 Q. Why didn't you choose to sue those other  
6 retailers?

7 MS. WALD: Object to the form.  
8 Instructing my client not to answer.  
9 Attorney-client privilege.

10 BY MS. KENYON:

11 Q. Did you ever collect Marlboro Miles?

12 A. Yes.

13 Q. You were already smoking Marlboro when  
14 you started collecting miles, correct?

15 A. That's how I got them.

16 Q. So what I'm asking, so when did you  
17 start collecting Marlboro Miles?

18 A. I do not remember.

19 Q. What I'm trying to understand, you were  
20 already smoking Marlboro when you started collecting  
21 miles, correct?

22 MS. WALD: Form.

23 THE WITNESS: It was after I started  
24 smoking them.

25 ///

1 BY MS. KENYON:

2 Q. So you started collecting miles after  
3 you started smoking Marlboros, correct?

4 MS. WALD: Form. Asked and answered.  
5 Three times.

6 BY MS. KENYON:

7 Q. Can you answer that question? Is that  
8 correct?

9 A. Yes.

10 Q. You did not start smoking Marlboro  
11 because of the miles, correct?

12 MS. WALD: Form. Asked and answered.  
13 Fourth time.

14 THE WITNESS: No.

15 BY MS. KENYON:

16 Q. So that's correct, you did not start  
17 smoking Marlboro because of the miles, correct?

18 MS. WALD: Form. Asked and answered.

19 THE WITNESS: Correct.

20 MS. KENYON: Off the record.

21 MS. WALD: Stay on the video.

22 (A recess is taken.)

23 MS. KENYON: Back on the record.

24 BY MS. KENYON:

25 Q. You doing okay? Can you point to one of

1 your --

2 A. Okay.

3 Q. Your husband also collected miles,  
4 right? Your husband also collected Marlboro Miles?

5 A. I do not remember. I guess so.

6 Q. Do you remember him collecting Marlboro  
7 Miles?

8 A. I do not remember.

9 Q. How did you collect the miles?

10 A. I do not remember.

11 Q. We know that you redeemed the miles for  
12 branded merchandise because you still have the  
13 duffel bags, the lantern and the knife, correct?

14 A. Yes.

15 Q. Did you redeem the miles for anything  
16 else?

17 A. I do not remember. I do not know.

18 Q. How did you select those items?

19 A. I do not know. I do not remember.

20 Q. Did you use the duffel bags?

21 A. I do not remember.

22 Q. Did you ever use the lantern?

23 A. I do not know.

24 Q. Did you ever use the knife?

25 A. I do not remember. I do not know.

1 Q. Did you like the products that you  
2 received, the duffel bag, the lantern and knife?

3 A. I guess so.

4 Q. Your husband Tony seems to really like  
5 them.

6 MS. WALD: Form.

7 BY MS. KENYON:

8 Q. Your husband Tony seems to really like  
9 them. Would you agree?

10 A. I do not know.

11 Q. You have kept the items all this time;  
12 is that right?

13 A. Yes. On bed.

14 Q. Right. And that's my point. You still  
15 have the duffel bags, the lantern and the knife,  
16 correct?

17 MS. WALD: Form. Asked and answered.

18 THE WITNESS: I guess so.

19 BY MS. KENYON:

20 Q. Why have you kept them?

21 A. I do not know.

22 Q. The Marlboro Miles did not keep you from  
23 switching to Basic when Marlboro cigarettes became  
24 too expensive, correct?

25 MS. WALD: Form.