

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.

Electronically Filed
May 04 2023 03:22 PM
Elizabeth A. Brown
Clerk of Supreme Court

*PETITIONERS' APPENDIX
VOLUME 11 (Nos. 1802-2000)*

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Attorneys for Petitioners, Sandra Camacho and Anthony Camacho

1 THE WITNESS: No.

2 BY MS. KENYON:

3 Q. The Marlboro Miles did not make you buy
4 Marlboro cigarettes, correct? Is that correct?

5 A. Okay. Correct.

6 Q. And the miles did not keep you from
7 switching from Marlboro to Basic, correct?

8 A. Correct.

9 Q. Did you ever receive coupons to purchase
10 cigarettes?

11 A. I do not know. I do not remember.

12 Q. Do you recall whether you had to fill
13 out any forms to get the duffel bag or the lantern
14 or the knife?

15 A. I do not remember.

16 Q. Do you recall looking through a catalog
17 or anything to pick out those items?

18 A. I do not remember.

19 Q. Did you ever complete surveys or
20 sweepstake entry forms?

21 A. I do not remember. I do not know.

22 Q. Did you ever use coupons to buy
23 cigarettes?

24 A. I do not remember.

25 Q. So last time we talked about your brand

1 history and what primary brands of cigarettes you
2 smoked. Do you remember that?

3 A. Yes.

4 Q. You also mentioned that you might borrow
5 cigarettes from someone else if you didn't have your
6 cigarettes or you ran out; is that correct?

7 A. No.

8 Q. So did you ever borrow a cigarette from
9 someone else?

10 A. Yes.

11 Q. That would include your husband or your
12 daughter or other family members; is that right?

13 A. Yes.

14 Q. But you almost always had your brand of
15 cigarettes with you, correct?

16 A. Yes.

17 Q. Did you ever count or track the number
18 of cigarettes per day that you smoked?

19 A. A lot. Don't know how many.

20 Q. So is the answer to my question that you
21 never counted or tracked the number of cigarettes
22 that you smoked in a day?

23 MS. WALD: Form. Asked and answered.

24 THE WITNESS: I do not know.

25 ///

1 BY MS. KENYON:

2 Q. How many cigarettes a day did you smoke
3 when you lived in the Chicago area?

4 A. I do not know. A lot. Don't know how
5 many.

6 Q. What does "a lot" mean?

7 A. Every half-hour.

8 Q. Do you know how many cigarettes a day
9 that would be?

10 A. I do not know.

11 Q. Do you know how many cigarettes are in a
12 pack of cigarettes?

13 A. I do not remember.

14 Q. How many cigarettes a day did you smoke
15 when you moved to Las Vegas?

16 A. I worked -- I worked up to two packs a
17 day.

18 Q. When you lived in Las Vegas, were you
19 still smoking one cigarette every half-hour?

20 A. Yes.

21 Q. What time did you typically wake up in
22 the morning?

23 MS. WALD: Form. Asked and answered.

24 THE WITNESS: 5:00, sometime 4:00.

25 ///

1 BY MS. KENYON:

2 Q. And what time would you typically go to
3 bed at night?

4 A. 12:00 or 1:00.

5 Q. How many cigarettes a day were you
6 smoking when you quit?

7 MS. WALD: Form.

8 THE WITNESS: Two packs.

9 BY MS. KENYON:

10 Q. Are you familiar with the term "chain
11 smoker"?

12 A. Yes.

13 Q. How would you define "chain smoker"?

14 A. Light one after another.

15 Q. Did you consider yourself a chain smoker
16 at any point?

17 A. Yes.

18 Q. When?

19 A. With friends.

20 Q. What friends?

21 A. I do not remember. Chicago.

22 Q. Did you ever chain smoke once you moved
23 to Las Vegas?

24 A. Not really.

25 Q. So would you get together with friends

1 and -- did your friends also smoke?

2 A. Chicago.

3 Q. Right. Did your friends also smoke?

4 Yeah.

5 A. Here (indicating)?

6 Q. You said with friends in Chicago?

7 A. I do not remember. School friends.

8 Q. So how old were you?

9 A. 17 or 18, and don't remember how long.

10 Q. Well, we know from your interrogatory
11 responses and your prior testimony that you did not
12 start smoking until you were 18; is that correct?

13 A. Correct.

14 Q. So did you actually ever light one
15 cigarette off of another?

16 MS. WALD: Form. Asked and answered.

17 BY MS. KENYON:

18 Q. Go ahead and answer.

19 A. Yes.

20 Q. Do you know whether it was one time that
21 you did that?

22 A. Few times.

23 Q. What does a "few times" mean?

24 A. More than ten or more.

25 Q. Would you just do that when you were

1 with your girlfriends?

2 A. Yes.

3 Q. Did you enjoy socializing and smoking
4 with your girlfriends?

5 MS. WALD: Form.

6 THE WITNESS: My first cig I did because
7 it was the cool thing to do then.

8 BY MS. KENYON:

9 Q. My question is a little bit different.
10 Did you enjoy socializing and smoking
11 with your girlfriends?

12 A. No.

13 Q. Then why did you do it?

14 A. Because I was addicted to them.

15 Q. When do you think you were first
16 addicted to cigarettes?

17 A. After the first hour. Because I wanted
18 more.

19 Q. Are you saying you were addicted after
20 your first cigarette?

21 MS. WALD: Form. Asked and answered.

22 THE WITNESS: Yes.

23 BY MS. KENYON:

24 Q. When did you first learn that cigarette
25 smoking could be addictive?

1 A. I do not remember.

2 Q. What does it mean to you to be addicted
3 to cigarettes?

4 A. To want one after another.

5 Q. Being addicted doesn't mean that a
6 smoker cannot quit, correct?

7 MS. WALD: Form.

8 THE WITNESS: I tried many times to
9 quit.

10 BY MS. KENYON:

11 Q. And you did, in fact, permanently quit
12 over four years ago, correct? And you did, in fact,
13 quit permanently over four years ago, correct?

14 A. Yes. It will be four years ago I quit
15 because of cancer.

16 Q. Regardless, you did permanently quit,
17 correct?

18 MS. WALD: Object to form. Asked and
19 answered.

20 It's okay, Sandra. Sandra, relax. It's
21 okay. It's okay. Calm down. Just answer the
22 question.

23 THE WITNESS: Yes.

24 BY MS. KENYON:

25 Q. Even though you believed you were

1 addicted, you quit?

2 MS. WALD: Form. Argumentative. Asked
3 and answered. We're not going to keep going down
4 this line. We know she quit.

5 BY MS. KENYON:

6 Q. You can go ahead and answer.

7 Even though you believed you were
8 addicted, you did quit, correct?

9 A. Tried.

10 Q. You're not currently smoking.

11 MS. WALD: And now you're just being
12 argumentative and harassing this witness. We know
13 she quit. She has cancer. That's clear in the
14 testimony. You can't keep harassing the client
15 right now. So I ask you to move on.

16 MS. KENYON: I just want an answer to my
17 question. And you know the case law as well as I
18 do. Please just object to form and stop trying to
19 coach your witness.

20 MS. WALD: I'm not trying to coach my
21 witness. You're harassing her right now by
22 beleaguering her with the same questions over and
23 over. We know she is not smoking.

24 BY MS. KENYON:

25 Q. You can go ahead and answer my question.

1 Can you please read back my question.

2 (The record is read by the reporter.)

3 MS. KENYON: Off the record.

4 (A recess is taken.)

5 MS. KENYON: We can go back on the
6 record.

7 THE VIDEOGRAPHER: I'm sorry. We didn't
8 leave record on video.

9 MS. WALD: It's fine. We can stay on
10 the video.

11 BY MS. KENYON:

12 Q. Even though you believe you were
13 addicted, you did permanently quit smoking, correct?

14 MS. WALD: Write it down or just point.
15 She's just asking if you quit smoking. So point.

16 THE WITNESS: Yes.

17 BY MS. KENYON:

18 Q. You told us that your sister Donna quit
19 smoking. Do you recall that?

20 MS. WALD: Form. Asked and answered.

21 BY MS. KENYON:

22 Q. Do you think Donna was addicted when she
23 quit smoking?

24 A. I do not know. I do not remember.

25 MS. LUTHER: She has to go to the

1 bathroom.

2 MS. WALD: You have to go bathroom? We
3 can take a break. You can go off the video.

4 THE VIDEOGRAPHER: The time is 9:52. We
5 are going off the record.

6 (A recess is taken.)

7 THE VIDEOGRAPHER: The time is
8 10:00 o'clock a.m. We are back on the record.

9 BY MS. KENYON:

10 Q. Are you ready to go?

11 A. Yes.

12 Q. Have you heard of people being addicted
13 to other things?

14 MS. WALD: Form.

15 BY MS. KENYON:

16 Q. Like food or gambling?

17 A. I do not know.

18 Q. Do you believe that you were addicted to
19 anything other than smoking?

20 A. No.

21 Q. What did you enjoy about smoking over
22 the years?

23 MS. WALD: Form. Mischaracterizes
24 testimony.

25 THE WITNESS: Did not enjoy smoking.

1 BY MS. KENYON:

2 Q. Did smoking relax you?

3 A. Yes.

4 Q. Did smoking help you concentrate?

5 A. I do not remember.

6 Q. Did smoking relieve anxiety or
7 nervousness?

8 MS. WALD: Form.

9 THE WITNESS: I do not remember.

10 BY MS. KENYON:

11 Q. Did you smoke to control your weight?

12 A. No.

13 Q. Did you smoke more when you were feeling
14 a certain way?

15 MS. WALD: Form.

16 THE WITNESS: No.

17 BY MS. KENYON:

18 Q. Did you smoke more when you were
19 stressed?

20 A. I smoked all the time.

21 Q. So is the answer to my question no, you
22 did not smoke more when you were stressed?

23 A. No.

24 Q. Did you smoke inside of your home?

25 A. Yes.

1 Q. Was there ever a point where you stopped
2 smoking inside your home?

3 A. When I tried to quit.

4 Q. Was there ever a point where you stopped
5 smoking inside and would only smoke outside?

6 A. No.

7 Q. Were there any rooms in your home where
8 you did not smoke?

9 A. Yes.

10 Q. Where?

11 A. Bedroom.

12 Q. Why did you not smoke in your bedroom?

13 A. Always in kitchen.

14 Q. Was there a reason you never smoked in
15 your bedroom?

16 A. No.

17 Q. Was there a reason you only smoked in
18 your kitchen?

19 A. No.

20 Q. Were there certain social settings where
21 you would not smoke?

22 A. No.

23 Q. Did you ever go to the movies?

24 A. Yes.

25 Q. Did you sit through the entire movie?

1 A. No.

2 Q. Why not?

3 A. Wanted cigs.

4 Q. How often did you go to the movies?

5 A. I do not remember.

6 Q. When's the last time you went to a
7 movie?

8 A. I do not remember.

9 Q. Were there people who you would not
10 smoke around?

11 A. No.

12 Q. Did you smoke around your grandchildren?

13 A. Yes.

14 Q. Did anyone ever express any concerns?

15 A. No.

16 Q. Did you ever visit someone's home where
17 smoking was not allowed?

18 A. I do not remember.

19 Q. Did you ever go to your sister's home?

20 A. I do not remember.

21 Q. When you were -- when you were living in
22 the Chicago area, did you ever go to one of your
23 sister's houses to visit them?

24 A. A lot. I don't remember.

25 Q. So I think last time we spoke there were

1 times that you had difficulty remembering things
2 from before your cancer and surgery.

3 MS. WALD: Form.

4 BY MS. KENYON:

5 Q. Is that fair?

6 A. Yes.

7 Q. And I just want to make sure I
8 understand. Are you trying to tell me that before
9 you had your surgery and treatment, you had a good
10 memory, but now you are past it?

11 A. Yes.

12 Q. Now, that you're past it, you struggle
13 with your memory?

14 MS. WALD: Form.

15 THE WITNESS: Yes.

16 BY MS. KENYON:

17 Q. Is that both short and long-term memory?

18 A. Yes.

19 Q. Did you smoke while you were pregnant?

20 A. Yes.

21 Q. Have you ever traveled by airplane?

22 Have you ever gone on an airplane?

23 A. Yes.

24 Q. Were you able to refrain from smoking on
25 the flights?

1 A. I do not remember.

2 Q. When's the last time you went on a
3 plane ride?

4 A. Almost four years ago.

5 Q. Where was the last flight you took?
6 Where did you go?

7 A. L.A.

8 Q. Who did you go with?

9 You can erase that.

10 A. Tony, daughter.

11 Q. What did you go to L.A. for?

12 A. Surgery.

13 Q. Did you smoke on that flight?

14 A. No.

15 Q. Prior to that, what is the last flight
16 you took?

17 A. I do not remember.

18 Q. Did you and Tony ever go on vacation
19 together?

20 A. I do not remember.

21 Q. Besides the flight four years ago, has
22 there been any other times where you've taken a
23 plane somewhere?

24 MS. WALD: Form.

25 THE WITNESS: Home to see family.

1 BY MS. KENYON:

2 Q. To the Chicago area?

3 A. Yes.

4 Q. When's the last time you flew home to
5 see family?

6 A. I do not remember.

7 Q. How many times have you flown home to
8 see family?

9 A. I do not remember.

10 Q. Was it one time?

11 A. I do not know. I do not remember.

12 Q. Switching gears a little bit. Did you
13 ever try a low-nicotine cigarette?

14 A. No.

15 Q. Did you ever try a denicotinized
16 cigarette? Have you ever tried a denicotinized or
17 nicotine-free cigarette?

18 A. No.

19 Q. Why not?

20 A. Never heard of that.

21 Q. Why did you not try a low-nicotine
22 cigarette?

23 A. I do not remember. I do not know.

24 Q. Did you ever smoke cigars?

25 A. No.

1 Q. Why not?

2 A. For a man.

3 Q. Did you ever try a cigar?

4 A. No.

5 Q. Have you ever used any other form of
6 tobacco?

7 A. What form?

8 Q. Have you ever used any other types of
9 tobacco or form of tobacco like a pipe or chew?

10 A. No.

11 Q. Have you ever used an e-cigarette?

12 A. Yes.

13 Q. When?

14 A. The times I tried to quit.

15 MS. KENYON: Off the record.

16 (A recess is taken.)

17 BY MS. KENYON:

18 Q. Are you ready to go?

19 A. Yes.

20 Q. How many times have you used
21 e-cigarettes in an effort to quit?

22 A. I do not remember. A lot.

23 Q. What does a lot mean?

24 A. Every time I tried to quit.

25 Q. When is the first time you used an

1 e-cigarette to try to quit?

2 A. I do not remember.

3 Q. Why did you decide to use an
4 e-cigarette?

5 A. I tried everything.

6 Q. But sticking with the e-cigarettes, why
7 did you decide to use e-cigarettes to quit?

8 A. I do not remember.

9 Q. What brand did you use? What brand of
10 e-cigarette did you use?

11 A. I do not remember.

12 Q. How often did you use it?

13 MS. WALD: Write it down.

14 THE WITNESS: Every time I tried to
15 quit.

16 BY MS. KENYON:

17 Q. When is the first time you tried to quit
18 smoking?

19 A. Sometime in the '90s.

20 Q. Why did you try to quit sometime in the
21 '90s?

22 A. It was a habit and cigs were getting
23 expensive.

24 Q. What brand were you smoking the first
25 time you tried to quit?

1 A. Marlboro.

2 Q. How long did you quit that first time?

3 A. One day.

4 Q. How did you quit for that day?

5 A. Nicorette Gum, regular gum.

6 Q. Did you need a prescription to get the
7 Nicorette Gum?

8 A. I do not remember.

9 Q. How many packs of the Nicorette Gum did
10 you chew?

11 A. I do not remember.

12 Q. Did you smoke while using the Nicorette
13 Gum?

14 A. No.

15 Q. How did you feel while you were using
16 the Nicorette Gum?

17 A. I wanted cigarette.

18 Q. Did you throw out your cigarettes when
19 you were using the Nicorette Gum?

20 A. Threw them out and took them back. I
21 even squished them.

22 Q. When you say "back," what do you mean?

23 A. Retrieved them. Garbage can.

24 Q. So the first time you tried to quit and
25 you were using the Nicorette Gum, you threw your

1 cigarettes in the trash, but then you went back and
2 got them out of the trash; is that correct?

3 A. Yes.

4 Q. So did you throw any of your cigarettes
5 away when you were using the Nicorette Gum that first
6 time?

7 MS. WALD: Form. Asked and answered.

8 THE WITNESS: Yes.

9 BY MS. KENYON:

10 Q. Did you throw away your ashtrays and
11 lighters when you were using the Nicorette Gum?

12 A. Put them away.

13 Q. Why did you not throw them away?

14 A. I do not know.

15 Q. Did Tony quit with you the first time
16 that you tried to quit?

17 A. I do not remember.

18 Q. So the first time you said you used
19 Nicorette Gum and regular gum. What kind of regular
20 gum were you using?

21 A. I forget names of gum.

22 Q. So the first time you tried to quit, did
23 your friends and family offer to help you?

24 A. I do not remember.

25 Q. Did Tony stop smoking around you?

1 A. I do not remember. I do not know.

2 Q. Were you motivated to quit at that time?

3 A. Yes.

4 Q. What was your motivation?

5 A. Wanted to quit.

6 Q. How did you feel when you quit?

7 MS. WALD: So for the record, she's
8 trying to mouth irritable, but she now thinks she
9 doesn't know how to spell it. And there's a few
10 others the translator can --

11 THE WITNESS: Miserable, mean.

12 BY MS. KENYON:

13 Q. So for that day that you quit, were you
14 able to carry on with your responsibilities?

15 MS. WALD: Form.

16 THE WITNESS: Not easy. Always thinking
17 about having cigarettes.

18 BY MS. KENYON:

19 Q. But you were able to carry on with your
20 daily responsibilities?

21 MS. WALD: Form.

22 THE WITNESS: I do not know.

23 BY MS. KENYON:

24 Q. Were you able to go to work that day?

25 A. I would try when home, off of work.

1 Q. Why?

2 A. That's what I wanted.

3 Q. Was there anything you couldn't do for
4 that day?

5 A. Smoke.

6 Q. Was there anything you couldn't do that
7 day?

8 A. I do not remember.

9 Q. At some point, you started smoking
10 again?

11 A. Yes.

12 Q. Why did you resume smoking a day later?
13 Why did you start smoking again a day later, the
14 next day?

15 A. Addicted. I tried many times to quit.

16 Q. This first time that you tried to quit
17 sometime in the '90s, did you use an e-cigarette?

18 A. No.

19 Q. When is the next time you tried to quit?

20 A. I do not remember.

21 Q. Do you know how many times you tried to
22 quit?

23 MS. WALD: Form.

24 BY MS. KENYON:

25 Q. How many times did you try to quit?

1 A. Over ten or more.

2 Q. How do you know it was over ten or more?

3 A. I tried a lot on my days off.

4 Q. So my question was a little bit

5 different. How do you know it was ten times or --

6 how do you know it wasn't less times that you tried
7 to quit?

8 A. Was trying to quit through '90s, 2000s.

9 THE VIDEOGRAPHER: We need to stop for a
10 moment. Lost the audio.

11 (A recess is taken.)

12 THE WITNESS: Was trying to quit
13 through '90s, 2000s.

14 BY MS. KENYON:

15 Q. How many times did you try to quit in
16 the '90s?

17 A. I do not remember.

18 Q. How many times did you try to quit in
19 the 2000s?

20 A. I do not remember.

21 Q. Besides cigarettes -- strike that.

22 Besides the fact that cigarettes were
23 getting expensive, was there any other reason you
24 tried to quit in the '90s?

25 A. Habit, smell.

1 Q. Why were you trying to quit because it
2 was a habit?

3 A. Because it was already addicted.

4 Q. How did you know you were addicted?

5 A. When you have to have a cigarette every
6 chance you have, you are addicted.

7 Q. Did you ever talk to your doctors about
8 that?

9 A. I do not remember. I do not know.

10 Q. You mentioned that you also -- you
11 didn't like the smell of cigarettes.

12 A. Correct.

13 Q. In the '90s, were you ever able to quit
14 for longer than a day?

15 A. No.

16 Q. In the 2000s, were you ever able to quit
17 for longer than a day?

18 A. Yes.

19 Q. How do you know that?

20 A. When I got cancer.

21 Q. Prior to the time that you permanently
22 quit smoking, were you ever -- strike that.

23 Prior to the time when you permanently
24 quit smoking, did you ever quit for more than a day?

25 A. No.

1 Q. Did Mr. Camacho ever try to quit smoking
2 with you?

3 A. I do not remember. I do not know.

4 Q. Do you recall reporting to doctors in
5 July of 2012 that you had quit smoking more than
6 12 months ago.

7 A. I do not remember.

8 Q. So sticking with the '90s, you don't
9 know how many times you tried to quit in the '90s?

10 MS. WALD: Form.

11 BY MS. KENYON:

12 Q. Correct?

13 A. No.

14 Q. No, you don't know? You don't know how
15 many times you tried to quit in the '90s?

16 A. Many.

17 Q. In the '90s, did you ever seek help from
18 a professional to quit smoking?

19 A. No.

20 Q. Did you ever ask for help from family
21 members to quit smoking?

22 A. No.

23 Q. Did you ever ask Mr. Camacho to quit
24 smoking with you?

25 A. I do not remember. I do not know.

1 Q. And in the 2000s, did you ever seek help
2 from a professional to quit smoking?

3 A. No.

4 Q. Did you ever ask for help from family
5 members to quit smoking?

6 A. No.

7 Q. Did you ever ask Mr. Camacho to quit
8 smoking with you?

9 A. I do not remember.

10 Q. Did you ever attend a stop smoking
11 clinic in the '90s?

12 A. No.

13 Q. Did you ever attend a stop smoking
14 clinic in the 2000s?

15 A. No.

16 Q. Did you ever try hypnosis in the '90s?

17 A. No.

18 Q. Did you ever try hypnosis in the 2000s?

19 A. No.

20 Q. Did you ever use nicotine gum in an
21 effort to quit smoking -- sorry. Strike that.

22 Did you ever use the nicotine patch in
23 an effort to quit smoking?

24 A. I do not remember. No.

25 Q. Besides the first time that you tried to

1 quit sometime in the '90s, did you ever use Nicorette
2 Gum to try to quit smoking?

3 A. I do not understand the question.

4 Q. Sure. We talked about the first time
5 you tried to quit smoking sometime in the '90s. You
6 told us you used Nicorette Gum.

7 Besides that time, did you ever use
8 Nicorette Gum to quit smoking? You're mouthing
9 "before that, no." Hold on.

10 So we know you never tried to quit
11 before the first time in the '90s, correct?

12 A. Correct.

13 Q. We've already talked about the first
14 time you tried to quit in the '90s when you used
15 Nicorette Gum and regular gum.

16 Besides that time, did you ever use
17 Nicorette Gum?

18 A. Tried it a few times.

19 Q. Do you know when you tried it?

20 A. No.

21 Q. Where did you buy the Nicorette Gum?

22 A. I do not remember.

23 Q. Did you need a prescription to get the
24 Nicorette Gum?

25 A. I do not remember. I do not know.

1 Q. How many packs of Nicorette Gum would you
2 chew?

3 A. I do not remember.

4 Q. Did you ever smoke while also using the
5 Nicorette Gum?

6 A. No.

7 MS. WALD: It's okay, Sandra. Wait for
8 a question. It's someone typing.

9 MS. HENNINGER: I'm sorry. Is that
10 bothering her?

11 MS. WALD: No, no. She was asking what
12 it was.

13 BY MS. KENYON:

14 Q. Did you ever throw away your matches and
15 lighters in the '90s to try to quit?

16 A. Put them away.

17 Q. So in the '90s, you never threw away
18 your matches and lighters?

19 MS. WALD: Form.

20 BY MS. KENYON:

21 Q. Is that correct?

22 A. Yes.

23 Q. Did you ever throw away your matches and
24 lighters in the 2000s?

25 A. No. Put them away.

1 Q. Did you ever try to quit cold turkey?

2 A. No.

3 Q. Why were you trying to quit smoking in
4 the 2000s?

5 A. Getting expensive, cig.

6 Q. Cigarettes were getting expensive; is
7 that correct?

8 A. Yes.

9 Q. When you quit in the 2000s, were you
10 able to carry on with your daily activities?

11 A. I do not remember. I do not know.

12 Q. When you would try to quit in the 2000s,
13 was there anything you could not do?

14 A. I do not know.

15 MS. KENYON: Let's go off the record and
16 take a short break.

17 THE VIDEOGRAPHER: The time is
18 10:58 a.m. We are going off the record.

19 (A recess is taken.)

20 THE VIDEOGRAPHER: The time is
21 11:07 a.m. We are back on the record.

22 BY MS. KENYON:

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

24 A. Yes.

25 Q. Doing okay?

1 A. Yes.

2 Q. We've talked about the first time you
3 tried to quit in the '90s, and you told us that in
4 the '90s and the 2000s, you tried to quit ten or so
5 times; is that right?

6 MS. WALD: Form.

7 THE WITNESS: Yes.

8 BY MS. KENYON:

9 Q. Besides that first quit sometime in the
10 '90s, are you able to recall anything specific about
11 any of the other times you tried to quit?

12 A. No.

13 Q. So I want to talk about when you
14 permanently quit. Okay?

15 Do you recall last time we were looking
16 at one of your medical records from 2008 (sic), and
17 there was some discussion about the quit date in the
18 medical record. Do you recall that?

19 A. No.

20 (Exhibit 11 marked.)

21 BY MS. KENYON:

22 Q. I am handing you what I've marked as
23 Defense Exhibit 11, and I've highlighted it
24 hopefully to help guide you as you look through it.

25 So do you see at the top of Exhibit 11

1 it says, "Camacho, Sandra," do you see that? Was
2 that yes?

3 A. Yes.

4 Q. And then underneath that, it reads,
5 "Office/Outpatient Visit, Visit Date: Wednesday
6 April 4th, 2018." Do you see that at the very top
7 here? Do you see where it says "Visit Date"?

8 A. Yes.

9 Q. And then under "Subjective" and the
10 "CC," it reads, "Mrs. Camacho is a 71-year old
11 female. This is her first visit to the clinic. The
12 following note is documented today following a
13 transition of care from an inpatient hospital (UCLA
14 Hospital). History details were provided by the
15 patient, the patient's spouse and a sibling. The
16 history appears to be reliable."

17 Did I read that correctly?

18 MS. WALD: Point to the answer.

19 THE WITNESS: Correct.

20 BY MS. KENYON:

21 Q. If you would turn to the second page for
22 me. Do you see under "Tobacco/Alcohol/Supplements,"
23 do you see where I'm at?

24 A. Yes.

25 Q. And it reads "Tobacco: She has a past

1 history of cigarette smoking; quit date: 09/2017."

2 Did I read that correctly?

3 A. Correct.

4 Q. Do you recall seeing Dr. Sharma at
5 Pulmonary Associates?

6 A. I do not remember.

7 Q. So is this medical record accurate? So
8 did you quit smoking September of 2017?

9 A. I do not remember.

10 Q. Do you have any reason to dispute what's
11 in this medical record?

12 A. I don't know him.

13 Q. Do you understand when you go in and you
14 see a doctor, they ask you questions about your
15 history, about your past medical history, your past
16 smoking history? Do you understand that?

17 A. Yes.

18 Q. Do you have any reason to dispute what
19 your doctor has written in this medical record?

20 A. I do not know.

21 Q. I'm going to ask you about another
22 doctor. Do you recall Dr. Akbarullah, Akbarullah,
23 pulmonologist with Pulmonary Associates?

24 A. No.

25 Q. Do you recall seeing Dr. Akbarullah in

1 July of 2018?

2 A. No.

3 Q. Do you recall telling him that you had
4 quit smoking in September of 2017?

5 A. No.

6 Q. Do you dispute that or do you just not
7 remember?

8 A. I do not remember.

9 Q. Do you recall stating in your initial
10 interrogatory responses that you quit in 2017?

11 A. I quit when I got cancer.

12 Q. How did you permanently quit smoking?

13 A. Surgery, took out voice box.

14 Q. Did you quit smoking at any point
15 leading up to the surgery?

16 MS. LUTHER: Do you want to go off the
17 record?

18 MS. KENYON: Yeah. Off the record.

19 THE VIDEOGRAPHER: The time is 11:16.
20 We are going off the record.

21 (A recess is taken.)

22 THE VIDEOGRAPHER: The time is 11:23.
23 We are back on the record.

24 BY MS. KENYON:

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

1 A. Yes.

2 Q. Are you feeling okay?

3 A. Yes.

4 Q. Before we broke, we were talking about
5 your final quit. Did you quit cold turkey? Well,
6 let me back up a step.

7 Do you know what "cold turkey" means?

8 A. Yes.

9 Q. When you permanently quit, did you quit
10 cold turkey?

11 A. I do not remember.

12 Q. Did you use any medication to quit?

13 A. I do not remember.

14 Q. What did you write on your board?

15 A. I stopped smoking when I had surgery.

16 Q. And so what I'm trying to understand,
17 did you ever -- did you ever smoke another cigarette
18 after your surgery?

19 A. No.

20 Q. Did you use any nicotine replacement
21 therapies to stay quit?

22 A. No.

23 Q. After your surgery, did you throw away
24 your cigarettes, ashtrays and lighters?

25 A. I do not remember.

1 Q. Do you still have your ashtrays and
2 lighters?

3 A. I do not know.

4 Q. Are you doing okay?

5 A. Okay.

6 Q. Are you still understanding my questions
7 or are you getting tired?

8 MS. WALD: Did you just mouth "I
9 understand"? Can you point to yes.

10 THE WITNESS: Yes.

11 BY MS. KENYON:

12 Q. So do you have any ashtrays, lighters or
13 cigarettes in your house right now?

14 A. Ashtray for daughter.

15 Q. Does your daughter smoke when she comes
16 over here?

17 A. Outside. If she does have one.

18 Q. Does she not usually smoke when she
19 comes to visit you? Does she not usually smoke when
20 she comes to visit you?

21 A. Most of the time she doesn't smoke.

22 Q. When did you have your last cigarette?

23 MS. WALD: Form.

24 THE WITNESS: When I had my surgery.

25 ///

1 BY MS. KENYON:

2 Q. So you had your last cigarette prior to
3 your surgery. You go in, you have your surgery.
4 You come out of surgery and you never smoke again;
5 is that right.

6 A. I didn't have a cigarette right before
7 surgery and never again.

8 Q. Did you use Nicorette Gum after your
9 surgery?

10 A. Have no teeth. Can't get them.

11 Q. So is the answer to my question, no, you
12 have never used Nicorette Gum after your surgery?

13 A. No.

14 Q. Did you ever use an e-cigarette after
15 your surgery?

16 A. No.

17 Q. Did Anthony quit with you at that time?

18 A. I do not know. I do not remember.

19 Q. Did Anthony quit smoking at some point?

20 A. I do not know. I do not remember.

21 Q. Is your husband currently smoking?

22 A. Not with me.

23 Q. Did you use a nicotine patch after your
24 surgery?

25 A. No. Voice box was enough.

1 Q. Were you motivated to quit smoking at
2 that time?

3 A. Had no choice to smoke again.

4 Q. So is the answer yes, you were motivated
5 to quit smoking at that time?

6 A. Yes. I do not know.

7 Q. How did you feel when you quit?

8 A. Anxious, miserable.

9 Q. Was that because you had quit or because
10 you had just had surgery?

11 A. I do not remember.

12 Q. Were you proud of yourself when you
13 quit?

14 A. Not them taking my voice box, no.

15 Q. My question's a little bit different.
16 Were you proud of yourself when you quit
17 smoking?

18 A. What is there to be proud of? Can't
19 talk. Can't go nowhere.

20 Q. Is there anything anyone could have told
21 you to make you quit smoking sooner?

22 A. The truth that cigarettes were harmful.

23 Q. Do you think you could have tried harder
24 to quit smoking sooner?

25 A. Yes.

1 Q. Have you ever heard the term "coffin
2 nails"?

3 A. No.

4 Q. Have you ever heard the term "cancer
5 sticks"?

6 A. No.

7 Q. Have you ever heard the term "nicotine
8 fit"?

9 A. Yes.

10 Q. What does "nicotine fit" mean to you?

11 A. Cigarette after cigarette all day.

12 Q. Have you ever used the term nicotine
13 fit? Have you ever used the term nicotine fit?

14 A. No.

15 Q. Do you read the newspaper? Do you read
16 the newspaper?

17 A. Not now.

18 Q. Did you at one point?

19 A. Yes. Always.

20 Q. When did you stop reading the newspaper?

21 A. When I lost sight in one eye.

22 Q. When did you lose your sight in -- is it
23 your right eye?

24 A. Yes.

25 Q. When did you lose your sight in your

1 right eye?

2 A. I do not remember.

3 Q. Why did you lose your site in your right
4 eye.

5 A. The retina is detaching. Can't have
6 surgery. Have to lay on stomach for one month.

7 Q. So just I just want to make sure I'm
8 understanding.

9 So you can't have the surgery because
10 you would have to lay on your stomach for a month;
11 is that right? Correct?

12 A. Yes.

13 Q. Has your doctor ever told you the cause
14 or why your retina is detaching?

15 A. No.

16 Q. We were talking about newspapers. Did
17 you subscribe to a newspaper when you lived in
18 Chicago?

19 A. Yes.

20 Q. Which newspaper?

21 A. Sun-Times.

22 Q. Did you have a subscription to the Sun
23 Times?

24 A. I think so. Ask Tony.

25 Q. Did you read the Sun-Times daily?

1 A. Yes.

2 Q. Do you recall ever reading any articles
3 about cigarettes or smoking?

4 A. I do not remember.

5 Q. Did you get any other newspapers while
6 you were living in the Chicago area?

7 A. No.

8 Q. Did you get a newspaper when you lived
9 in Las Vegas?

10 A. I do not remember.

11 Q. Did you read the newspaper when you
12 lived in Las Vegas?

13 A. Yes.

14 Q. Do you know what newspaper you read?

15 A. No.

16 Q. How often would you read the newspaper
17 in Las Vegas?

18 A. I do not remember.

19 Q. Was it daily, like, in Chicago?

20 A. I do not remember.

21 Q. Do you recall ever reading any articles
22 about cigarettes or smoking in Las Vegas?

23 A. No.

24 Q. Did you read magazines while you were
25 living in Chicago?

1 A. Yes.

2 Q. Which ones?

3 A. People. Whatever was by my mom's house.

4 Q. Do you recall ever reading Time or
5 Newsweek when you were living in Chicago?

6 A. No.

7 Q. Do you recall reading any articles about
8 cigarettes or smoking in People?

9 A. Advertise.

10 Q. Do you recall ever reading any articles
11 about cigarettes or smoking in People?

12 A. I do not remember.

13 Q. What advertisements do you recall seeing
14 in People?

15 A. A man smoking.

16 Q. Do you recall what brand of cigarette
17 the ad was for?

18 A. I do not remember.

19 Q. Do you recall anything that the
20 advertisement in People said?

21 A. No.

22 Q. Do you know whether the advertisement
23 had a warning label on it?

24 A. No.

25 Q. Do you know whether the advertisement

1 that you saw in People had a warning label on it?

2 MS. WALD: Form.

3 THE WITNESS: I do not remember.

4 BY MS. KENYON:

5 Q. Did you rely on anything in the
6 advertisement that you saw?

7 A. Just that it was cool to smoke.

8 Q. Were you already smoking when you saw
9 this ad?

10 A. I do not remember.

11 Q. Did you switch brands of cigarettes
12 after seeing that ad?

13 A. I switched in the '90s.

14 Q. So is that a "no," you did not switch
15 brands after you saw that ad in People?

16 A. No.

17 Q. Do you recall seeing any other
18 advertisements for cigarettes in magazines when you
19 were living in Chicago?

20 A. Billboard.

21 Q. So if you could just answer the specific
22 question I'm asking.

23 Can you read my question back.

24 (The record is read by the reporter.)

25 MS. WALD: When you read it back, it

1 doesn't go live. Starting right there.

2 THE WITNESS: No.

3 BY MS. KENYON:

4 Q. Did you read any magazines when living
5 in Las Vegas?

6 MS. WALD: Form.

7 THE WITNESS: I do not remember.

8 BY MS. KENYON:

9 Q. Did you ever read Reader's Digest?

10 A. No.

11 Q. Did you ever read LIFE magazine?

12 A. No.

13 Q. Did you see any ads -- strike that.

14 Did you see any cigarette ads in
15 magazines while you were living in Las Vegas?

16 A. I do not remember.

17 Q. Did your family have a television in the
18 home when you were growing up?

19 A. Yes.

20 Q. Do you recall when you first got a TV?

21 A. No.

22 Q. What types of programs did you like to
23 watch?

24 A. I remember Howdy Doody, American
25 Bandstand, I Love Lucy.

1 Q. Did you ever see anything on television
2 discussing the health hazards of smoking when you
3 were growing up?

4 MS. WALD: Form.

5 THE WITNESS: No. Only in late '80s,
6 early '90s, tobacco company said cigarettes were
7 safe, nothing about being harmful.

8 BY MS. KENYON:

9 Q. Where did you see that?

10 A. On the news.

11 Q. Do you know what channel you were
12 watching?

13 A. On all channels.

14 Q. I'm asking specifically what channel you
15 were watching?

16 A. 5 or 13.

17 Q. Is that like ABC? NBC?

18 A. I have it written down.

19 Q. Have what written down?

20 A. ABC, CBS.

21 MS. WALD: Just answer the question.

22 BY MS. KENYON:

23 Q. Were you living in Las Vegas or Chicago
24 at the time?

25 A. Here and there.

1 MS. WALD: Do you need to go off? Do
2 you need a break? Bathroom? Okay. We'll take a
3 break.

4 THE VIDEOGRAPHER: The time is 11:56.
5 We are going off the record.

6 (A recess is taken.)

7 THE VIDEOGRAPHER: The time is 12:00
8 o'clock. We are back on the record.

9 BY MS. KENYON:

10 Q. Are you ready to go?

11 A. Yes.

12 Q. So before we broke, you were talking
13 about something that you saw on the news from the
14 tobacco companies.

15 Is this --

16 A. Yes.

17 Q. Is this something that you saw one time?

18 MS. WALD: Form.

19 BY MS. KENYON:

20 Q. You were mouthing "yes"?

21 A. Yes.

22 Q. So do you recall whether you were living
23 in Las Vegas or Chicago when you saw something on
24 the news?

25 MS. WALD: Form. Asked and answered.

1 THE WITNESS: I do not remember.

2 BY MS. KENYON:

3 Q. Was anyone with you when you saw this on
4 the news?

5 A. Tony.

6 Q. Did you discuss it with him?

7 A. For a minute.

8 Q. What did you discuss?

9 A. I believe them.

10 Q. What tobacco companies did you see?

11 MS. WALD: Object to form. All of this
12 was covered in the first deposition. We went to the
13 judge. You stated to the judge that you would not
14 reiterate and go over any of the prior testimony. I
15 have the page and lines from the prior deposition,
16 so this is all completely inappropriate that -- this
17 has been covered. This is exactly the reason behind
18 not having extra time in depositions because this
19 has all been covered previously extensively in the
20 Volume II of the deposition.

21 BY MS. KENYON:

22 Q. What tobacco companies did you see?

23 A. I do not remember.

24 Q. Did you rely on the statements that you
25 saw?

1 A. Sure did.

2 Q. How?

3 A. Kept on smoking.

4 Q. Are you saying you would have quit
5 smoking if the statement had not been made?

6 MS. WALD: Form.

7 THE WITNESS: Would have kept trying to
8 quit.

9 BY MS. KENYON:

10 Q. Did you try to quit after you saw the
11 news story?

12 A. A few times.

13 Q. I'm asking right after you saw the news
14 story, did you try to quit smoking?

15 A. Went for a cigarette.

16 Q. How do you know that? How do you know
17 that?

18 A. I believed them. That's how I knew they
19 were safe.

20 Q. Did you ever hear that cigarettes were
21 completely safe?

22 A. Safe is safe.

23 Q. Have you heard of something called "a
24 frank statement to cigarette smokers"?

25 A. No.

1 Q. Do you recall reading, hearing or seeing
2 any statements about smoking and health specifically
3 from R. J. Reynolds?

4 MS. WALD: Form. Asked and answered.

5 THE WITNESS: Just that no proof they
6 were harmful.

7 BY MS. KENYON:

8 Q. Have you ever read or heard anything
9 about the Tobacco Industry Research Committee?

10 A. No.

11 Q. Have you ever heard anything about the
12 Council For Tobacco Research?

13 A. No.

14 Q. Have you ever heard -- read or heard
15 anything about the Tobacco Institute?

16 A. No.

17 Q. Have you ever read or heard anything
18 about Hill and Knowlton?

19 A. No.

20 Q. Have you ever purchased a product
21 because of an advertisement you saw?

22 MS. WALD: Form.

23 THE WITNESS: No.

24 BY MS. KENYON:

25 Q. Do you understand that the purpose of an

1 advertisement is to sell a product?

2 MS. WALD: Form.

3 THE WITNESS: Yes.

4 BY MS. KENYON:

5 Q. Do you believe everything you see in
6 advertisements for products?

7 MS. WALD: Form.

8 THE WITNESS: I do not know.

9 BY MS. KENYON:

10 Q. Do you recall seeing any advertisements
11 for cigarettes on TV?

12 A. I do not remember.

13 Q. You mentioned billboards. Can you tell
14 me what you recall about seeing ads for cigarettes
15 on billboards?

16 A. A man holding a cigarette.

17 Q. Is that the one ad you saw in People
18 Magazine?

19 MS. WALD: Form.

20 THE WITNESS: Both.

21 BY MS. KENYON:

22 Q. So the only cigarette advertisements
23 you've ever seen was of a man holding a cigarette;
24 is that correct?

25 MS. WALD: Form. Mischaracterizes her

1 testimony.

2 THE WITNESS: That I remember.

3 BY MS. KENYON:

4 Q. Do you recall the brand of cigarette?

5 A. No.

6 Q. Do you know whether the billboard had a
7 warning label on it?

8 A. No.

9 Q. Did you ever rely on the advertisement
10 you saw on the billboard to change the brand of
11 cigarette you were smoking?

12 A. I do not remember.

13 Q. Where did you see the billboard?

14 A. I do not remember.

15 Q. When did you see the billboard?

16 A. Years ago in Chicago.

17 Q. Were you with anyone when you saw the
18 billboard?

19 A. I do not remember.

20 Q. Did you see the billboard one time?

21 A. In my head, yes.

22 Q. Do you know?

23 A. That's all I see is him.

24 Q. After you saw the billboard of a man
25 holding a cigarette, you did not switch brands, did

1 you?

2 A. No.

3 Q. Did you ever discuss cigarette
4 advertising with anyone?

5 A. No.

6 Q. Did you ever buy a particular brand of
7 cigarette because of an advertisement?

8 A. I smoked filter cigarettes thinking they
9 were safer.

10 Q. My question was different. Did you ever
11 buy a particular brand because of an advertisement?

12 A. I only remember billboard. Nothing
13 else.

14 Q. You never saw an ad that said filtered
15 cigarettes were safer, correct?

16 MS. WALD: Form.

17 BY MS. KENYON:

18 Q. Is that correct?

19 A. I do not remember. I do not remember.

20 Q. Do you recall seeing any advertisements
21 for Marlboro cigarettes?

22 A. I do not remember.

23 Q. Do you recall seeing any advertisements
24 for L&M cigarettes?

25 MS. WALD: Are you doing okay? Are you

1 understanding the questions?

2 THE WITNESS: I smoked L&M because
3 girlfriend gave it to me.

4 BY MS. KENYON:

5 Q. Right. So the only reason that you
6 smoked an L&M cigarette was because a girlfriend
7 gave it to you, correct?

8 A. And it was filter.

9 Q. So my question is, you never saw an ad
10 for L&M cigarettes, correct?

11 A. I do not remember.

12 Q. Did you ever see an ad for Basic
13 cigarettes?

14 A. I do not remember.

15 MS. WALD: Whenever you're at a good
16 stopping point, I think she might be getting
17 confused. By the way you're answering these
18 questions, it seems like you're getting a little
19 confused.

20 MS. HENNINGER: Yep.

21 MS. WALD: We've been going two hours
22 and 30 minutes today, so I think this might be a
23 good stopping point for the day.

24 MS. KENYON: All right. We'll go off
25 the record.

1 THE VIDEOGRAPHER: That ends today's
2 deposition, Volume III of Sandra Camacho. The time
3 is 12:19 p.m.

4 We are going off the record.

5

6 (The deposition concluded at 12:19 p.m.)

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CERTIFICATE OF DEPONENT

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* * * * *

I, SANDRA CAMACHO, deponent herein, do hereby
certify and declare the within and foregoing
transcription to be my deposition in said action;
that I have read, corrected and do hereby affix my
signature to said deposition under penalty of
perjury.

SANDRA CAMACHO, Deponent

1 CERTIFICATE OF REPORTER

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

4

5 I, Karen L. Jones, a duly commissioned and
6 licensed Court Reporter, Clark County, State of
7 Nevada, do hereby certify: That I reported the
taking of the deposition of the witness, SANDRA
CAMACHO, commencing on Tuesday, December 7, 2021 at
9:06 a.m.

8

9 That prior to being examined, the witness was,
by me, duly sworn to testify to the truth. That I
10 thereafter transcribed my said shorthand notes into
typewriting and that the typewritten transcript of
11 said deposition is a complete, true and accurate
transcription of said shorthand notes.

12

13 I further certify that (1) I am not a relative
or employee of an attorney or counsel of any of the
14 parties, nor a relative or employee of an attorney
or counsel involved in said action, nor a person
15 financially interested in the action; nor do I have
any other relationship with any of the parties or
16 with counsel of any of the parties involved in the
action that may reasonably cause my impartiality to
17 be questioned; and (2) that transcript review
pursuant to NRCP 30(e) was requested.

18

19

20 IN WITNESS HEREOF, I have hereunto set my
hand, in my office, in the County of Clark, State of
21 Nevada, this 19th day of December, 2021.

22



23

KAREN L. JONES, CCR NO. 694

24

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1 DISTRICT COURT

2 CLARK COUNTY, NEVADA

3 SANDRA CAMACHO,)
4 individually, and ANTHONY)
5 CAMACHO, individually,) CASE NO.:
6) A-19-807650-C
7 Plaintiffs,)

8 vs.)

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

VIDEOTAPED DEPOSITION OF

SANDRA CAMACHO

VOLUME IV

Defendants.)

23 Taken on Wednesday, December 8, 2021

At 9:04 a.m.

24 Las Vegas, Nevada

25 Reported By: Karen L. Jones, CCR NO. 694

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DEPOSITION OF SANDRA CAMACHO

8

VOLUME IV

9

Taken on Wednesday, December 8, 2021

10

Through a translator

11

By a Certified Stenographer

12

At 9:04 a.m.

13

At 531 Morning Mauve Avenue

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Las Vegas, Nevada

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22

23

24

Reported By: Karen L. Jones, CCR NO. 694

25

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18

19

Also Present:

20

21 Gian Sapienza, Legal Videographer
22 Dwayne Parrette, Translator/Reader
Anthony Camacho

23

24

25

1 I N D E X

2 WITNESS: SANDRA CAMACHO

3 EXAMINATION PAGE

4 BY: Ms. Kenyon 250, 348

BY: Ms. Luther 296, 355

5 BY: Ms. Henninger 316, 361

BY: Ms. Wald 322

6

7

8

E X H I B I T S

9

10 NUMBER DESCRIPTION PAGE

11 Exhibit 12 8/22/16 Letter to Dr. Wikler 268
12 from Dr. Weingarten

12

13

14 P L A I N T I F F S' E X H I B I T S

15 NUMBER DESCRIPTION PAGE

16 Exhibit 1 L&M Advertisements 324

17 Exhibit 2 Marlboro Advertisements 326

18 Exhibit 3 Basic Cigarette Advertisement 328

19 Exhibit 4 Video Clip of Commercial 362

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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 IV,
5 Wednesday, December 8th, 2021, at 9:04 a.m.

6 This deposition is being held at 531
7 Morning Mauve Avenue, Las Vegas, Nevada 89183,
8 entitled Sandra and Anthony Camacho versus Philip
9 Morris, et al., in the District Court, Clark County,
10 Nevada, 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 R. J. Reynolds Tobacco Company.

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

24 THE VIDEOGRAPHER: Thank you.

25 The court reporter will now administer

1 the oath.

2 (The translator was sworn.)

3 Whereupon,

4 SANDRA CAMACHO,

5 having been first duly sworn to testify to the
6 truth, the whole truth and nothing but the truth,
7 was examined and testified as follows:

8

9 MS. KENYON: Good morning, Mrs. Camacho.

10 MS. LUTHER: She hasn't responded to the
11 oath yet.

12 MS. KENYON: Oh, sorry.

13 MS. WALD: Can you respond to the oath.
14 Do you agree?

15 THE REPORTER: Do you want to do it
16 again?

17 MS. WALD: Sure. Point.

18 THE WITNESS: Yes.

19 EXAMINATION

20 BY MS. KENYON:

21 Q. Good morning, Mrs. Camacho. How are you
22 feeling today. Are you okay?

23 A. Yes.

24 Q. Same procedures as yesterday; point to
25 your answer or write your answer. Okay? Is that

1 okay?

2 A. Yes.

3 Q. We'll just jump right into things.

4 Yesterday you mentioned that you watched

5 I Love Lucy. Do you remember that?

6 A. Yes.

7 Q. When did you watch I Love Lucy?

8 A. Years ago. Don't know year.

9 Q. Were you living in Chicago when you
10 watched I Love Lucy?

11 A. Yes.

12 Q. Do you recall seeing cigarette ads on I
13 Love Lucy?

14 A. No.

15 Q. Do you recall seeing any cigarette
16 sponsorships on I Love Lucy?

17 A. No.

18 Q. Do you listen to the radio?

19 A. No.

20 Q. Have you listened to the radio at any
21 point during your life?

22 A. No.

23 Q. Do you recall ever hearing any news
24 stories about cigarette smoking on the radio?

25 A. No.

1 Q. Last time, we discussed the first
2 warnings that went on every pack of cigarettes
3 starting in 1966 and then changing in 1970.

4 Do you recall that?

5 A. No, I do not remember.

6 Q. Are you aware that in 1985 the pack
7 warnings changed to a series of rotating warnings
8 which are the same warnings on cigarette packs sold
9 in the U.S. today?

10 A. I do not remember.

11 Q. Are you aware that those warnings
12 include a specific warning that smoking causes lung
13 cancer, heart disease, emphysema and may complicate
14 pregnancy?

15 A. I do not remember.

16 Q. Another warning states quitting smoking
17 now greatly reduces serious risks to your health.

18 Do you remember seeing that?

19 A. I do not remember.

20 Q. Are you aware that those same warnings
21 appeared on all cigarettes regardless of the type of
22 cigarette?

23 A. I do not remember. I do not know.

24 Q. So the same warning labels appeared on
25 filtered and unfiltered cigarettes.

1 Do you recall that?

2 A. No.

3 Q. The same warning label appeared on
4 regular cigarettes and -- strike that.

5 The same warning label appeared on
6 regular and light cigarettes, are you aware of that?

7 A. I do not remember.

8 Q. Is there any reason you could not have
9 read -- is there any reason you would not have read
10 and been able to understand the rotating warning
11 labels on packs of cigarettes?

12 A. I do not remember. Don't remember that
13 at all.

14 Q. Yesterday, you were talking about
15 e-cigarettes. Do you remember that?

16 A. Yes.

17 Q. Do you remember what the e-cigarette
18 that you used, what it looked like?

19 A. I do not know.

20 Q. Do you remember if you had to use
21 cartridges?

22 A. I do not remember.

23 Q. Do you know if you had to pick a
24 specific flavor or a strength when you picked the
25 e-cigarette?

1 A. I do not remember.

2 Q. Do you recall how often in a day you
3 would use the e-cigarette?

4 A. I do not remember.

5 Q. Do you recall whether it was a flavored
6 e-cigarette?

7 A. I do not remember.

8 Q. Do you drink alcohol?

9 A. No.

10 Q. Did you in the past?

11 A. Once in a while when we went dancing.

12 Q. What would you drink when you went out?

13 A. I do not remember.

14 Q. Did you like to smoke when you would go
15 out dancing and have drinks?

16 A. Never liked it. Was habit and
17 addictive.

18 Q. Did you enjoy going out dancing?

19 A. Yes.

20 Q. Yesterday we talked about some of the --
21 strike that.

22 Would you describe yourself as someone
23 who is intelligent?

24 A. Yes.

25 Q. Are you a motivated person?

1 MS. WALD: Form.

2 THE WITNESS: Yes. Was.

3 BY MS. KENYON:

4 Q. What do you mean "was"?

5 A. Today, I feel nothing.

6 Q. So in the past, you would have described
7 yourself as a motivated person?

8 A. Yes.

9 Q. Would you describe yourself as
10 strong-willed?

11 A. Yes.

12 Q. Are you able to make your own decisions
13 and stick to them?

14 A. Before.

15 Q. When you say "before," before --

16 A. Yes.

17 Q. Before what?

18 A. My cancer. Surgery.

19 Q. So are you saying now you can't make
20 your own decisions?

21 A. No. Get confused.

22 Q. So before your surgery, you were able to
23 make your own decisions and stick to them?

24 A. Yes.

25 Q. Are you someone who doesn't want to be

1 told what to do?

2 A. No.

3 Q. Could anyone have said something to you
4 that would have made you quick smoking sooner?

5 A. No.

6 Q. Are there any other habits or behaviors
7 that you've ever tried to change?

8 A. No.

9 Q. Have you ever tried to change your diet?

10 A. Yes.

11 Q. Have you tried to lose weight?

12 A. Always.

13 Q. What have you done to try to lose
14 weight?

15 A. I do not remember. Order food.

16 Q. Like through a diet program?

17 A. Yes.

18 Q. How did you act while you were using --
19 well, strike that.

20 Do you recall what diet program?

21 A. I do not remember.

22 Q. How did you act while you were on the
23 diet and using the food?

24 A. Good.

25 Q. Were you able to lose weight?

1 A. Yes, but gained it back.

2 Q. Did you try any other methods to lose
3 weight?

4 A. No.

5 Q. You've had issues with your weight over
6 the years, right?

7 A. Yes.

8 Q. Your doctors have told you that you need
9 to lose weight?

10 A. No.

11 Q. You don't recall any of your doctors
12 telling you to lose weight?

13 A. No.

14 Q. Do you recall Dr. Adaoag telling you to
15 lose weight?

16 A. Who is he?

17 Q. Do you recall seeing Dr. Adaoag as your
18 primary care doctor for over five years?

19 A. No.

20 Q. You saw him in December of 2008, and at
21 that time, he told you to eat a low fat and low
22 caloric diet. Do you recall that?

23 MS. WALD: Form.

24 THE WITNESS: No.

25 ///

1 BY MS. KENYON:

2 Q. At that appointment, he also discussed
3 with you a plan for you to begin a weight loss
4 program. Do you remember that?

5 A. No.

6 Q. Would seeing the record help you
7 remember that?

8 A. No.

9 Q. Do you dispute that or do you just not
10 recall?

11 A. I do not remember. I do not know.

12 Q. Has a doctor diagnosed you with obesity
13 or as obese?

14 A. No.

15 Q. Do you know who Dr. Wikler is?

16 A. Yes.

17 Q. He's your primary care doctor, right?

18 A. Yes.

19 Q. You went to Dr. Wikler a lot over the
20 years, right?

21 A. Yes.

22 Q. Do you recall Dr. Wikler telling you to
23 lose weight during your appointments?

24 A. No. I do not remember.

25 Q. Would seeing a record help you remember?

1 A. No.

2 Q. Do you dispute that Dr. Wikler told you
3 to lose weight or do you just not remember?

4 A. I do not remember.

5 Q. So did you ever try to lose weight in
6 response to your doctor's advice?

7 MS. WALD: Form.

8 THE WITNESS: I do not remember.

9 BY MS. KENYON:

10 Q. Did a doctor ever tell you about the
11 health risks of being overweight?

12 A. I do not remember.

13 Q. You have also -- you've refused to be
14 weighed at your doctors' offices many times over the
15 years, correct?

16 A. No. They weighed me every visit.

17 Q. So you don't recall ever refusing to be
18 weighed when seeing a doctor?

19 A. No.

20 Q. Your weight impacts your everyday life,
21 right?

22 MS. WALD: Form.

23 THE WITNESS: Not really. I did what I
24 always did.

25 ///

1 BY MS. KENYON:

2 Q. So you're saying you're not any more or
3 less active now than you were ten years ago?

4 MS. WALD: Form.

5 THE WITNESS: Not active no more.

6 BY MS. KENYON:

7 Q. Does your weight affect your ability to
8 go for walks?

9 A. No.

10 Q. Does your weight affect your ability to
11 be more active and more mobile?

12 A. No.

13 Q. Did your weight ever impact your ability
14 to work?

15 A. No.

16 Q. You told us you stopped working because
17 of foot pain; is that right?

18 A. Yes.

19 Q. Did your activity level decrease because
20 of your foot pain?

21 A. Yes.

22 Q. Were you able to walk less because of
23 your foot pain?

24 A. Yes.

25 Q. Has your weight impacted your marriage?

1 A. No.

2 Q. Have you ever been diagnosed with sleep
3 apnea?

4 A. No.

5 Q. Have you ever been treated for anxiety?

6 A. No.

7 Q. Have you ever been treated for
8 depression?

9 A. No. Now I am depressed a lot.

10 Q. Have you seen a doctor for your
11 depression?

12 A. No.

13 Q. Why not?

14 A. It comes with the surgery and radiation
15 and chemo.

16 Q. So I'm a little confused. So are you --
17 did you see someone about your depression at the
18 time you were receiving radiation and chemo?

19 A. No.

20 Q. Are you currently experiencing any
21 depression?

22 MS. WALD: Form.

23 THE WITNESS: In and out. More out of
24 depression.

25 ///

1 BY MS. KENYON:

2 Q. So when you say "more out of
3 depression," you experience more times where you're
4 not depressed?

5 A. Right.

6 Q. Have you ever seen a doctor for the
7 times where you are feeling depressed?

8 A. No need -- no need to. I realize it
9 came from surgery, and I myself talk myself through
10 it. Not easy what I go through day and night.

11 Q. But it's not so bad that you've
12 considered seeing a doctor for it?

13 MS. WALD: Form.

14 THE WITNESS: No.

15 BY MS. KENYON:

16 Q. Your medical records indicate you've had
17 issues with your teeth over the years; is that
18 right?

19 A. I do not remember.

20 Q. Do you recall having your teeth pulled?

21 A. Yes.

22 Q. Do you recall when -- strike that.
23 Why did you have to have your teeth
24 pulled?

25 A. I do not remember.

1 Q. Do you recall when you had your first
2 tooth pulled?

3 A. No.

4 Q. You've had all of your teeth removed; is
5 that right?

6 A. Yes.

7 Q. Have any of your doctors told you why
8 you've had to have your teeth pulled?

9 A. I do not remember.

10 Q. Have you ever been diagnosed with
11 bronchitis?

12 A. I do not know.

13 Q. Have you ever been diagnosed with
14 asthma?

15 A. No.

16 Q. You have not been diagnosed with COPD,
17 right? You have not been diagnosed with COPD; is
18 that right?

19 A. I do not remember. I do not know.

20 Q. Have you ever been diagnosed with acid
21 reflux?

22 A. I do not remember.

23 Q. Have you ever been diagnosed with GERD
24 or gastroesophageal reflux disease, gastroesophageal
25 reflux disease?

1 A. I do not remember, I do not know.

2 Q. Have you ever been diagnosed with
3 hypertension?

4 A. Blood pressure, yes.

5 Q. So you've been diagnosed with high blood
6 pressure?

7 A. Yes.

8 Q. When were you diagnosed with high blood
9 pressure?

10 A. I do not remember.

11 Q. Who diagnosed you?

12 A. I do not remember.

13 Q. Do you have to take medication for your
14 blood pressure?

15 A. Yes.

16 Q. Do you know what you take? If you don't
17 remember, that's fine. Do you know what you take
18 for blood pressure -- I'll start over.

19 Do you know what you take for your blood
20 pressure?

21 A. No.

22 Q. Is it something you take daily?

23 A. Yes.

24 Q. Has -- who prescribes the medication?

25 A. Wikler.

1 Q. Has Dr. Wikler ever told you a cause of
2 your high blood pressure?

3 A. I do not know. I do not remember.

4 Q. Have you ever been diagnosed with
5 hypertension?

6 A. What is that?

7 Q. So do you know if you've been diagnosed
8 with hypertension?

9 A. No, I do not remember. I do not know.

10 Q. Have you ever had high cholesterol?

11 A. I do not remember.

12 Q. Do you see a gynecologist regularly?

13 A. No.

14 Q. Have you ever been diagnosed with HPV?

15 A. No. Had hyster- -- hysterectomy.

16 Q. When did you have a hysterectomy?

17 A. I do not remember.

18 Q. I want to talk about your laryngeal
19 cancer and get some of the details. Okay.

20 What symptoms did you first experience?

21 A. I do not remember.

22 Q. Do you know when your symptoms started?

23 A. No.

24 Q. Do you know who you went to see for your
25 laryngeal cancer?

1 A. No.

2 Q. Do you recall anything leading up to
3 your diagnosis and surgery?

4 A. No.

5 Q. You told us that you were diagnosed with
6 laryngeal cancer in March of 2018?

7 A. Yes.

8 Q. Are you doing okay?

9 THE INTERPRETER: Do you need Tony?

10 MS. LUTHER: I think we need to go --
11 no?

12 THE WITNESS: Okay.

13 BY MS. KENYON:

14 Q. Was it Dr. Berke that diagnosed you with
15 laryngeal cancer?

16 MS. WALD: You can't ask Tony.

17 THE WITNESS: I do not remember. Don't
18 remember surgery and why and 17 days there in
19 hospital. I do not remember.

20 BY MS. KENYON:

21 Q. So the surgery, you had, you had a total
22 laryngectomy; is that right?

23 A. Yes.

24 Q. And after the laryngectomy, you spent
25 17 days in the hospital; is that right?

1 A. Yes.

2 Q. Did you undergo speech therapy in the
3 hospital?

4 A. I do not remember.

5 Q. Did you receive training or teachings on
6 how to take care of your trach in the hospital?

7 A. I do not remember.

8 Q. Did any of your family members learn how
9 to take care of your trach?

10 A. Yes.

11 Q. Who?

12 A. Tony.

13 Q. How did Tony feel about helping to take
14 care of your trach?

15 A. Very good about the whole thing.

16 Q. Was he taught how to suction and take
17 care of everything and clean it?

18 A. Everything.

19 Q. Did he ever refuse or say he didn't want
20 to learn how to suction or take care of your trach?

21 A. No. I do not remember.

22 Q. Did you come home after you were
23 discharged from the hospital?

24 A. Yes.

25 Q. After your surgery, did any of your

1 doctors discuss additional care and treatments that
2 were recommended for your laryngeal cancer?

3 A. I do not remember.

4 Q. In 2008, did your doctors recommend that
5 you undergo radiation therapy?

6 MS. LUTHER: '18.

7 MS. KENYON: Sorry. Let me repeat my
8 question. Thank you.

9 BY MS. KENYON:

10 Q. In 2018, did any of your doctors
11 recommend that you receive radiation treatments?

12 A. I do not remember.

13 Q. In 2018, after your surgery, do you
14 recall Dr. Berke recommending you receive radiation
15 to treat your laryngeal cancer?

16 A. I do not remember.

17 Q. Would seeing a record help you remember?

18 A. No.

19 Q. Do you dispute that or just not
20 remember?

21 A. I do not remember. I remember nothing
22 about before and after surgery.

23 Q. Do you recall seeing an oncologist named
24 David Pomerantz in May of 2018?

25 A. I do not remember.

1 Q. Do you remember Dr. Pomerantz
2 recommending you receive radiation?

3 A. I do not remember.

4 Q. Do you recall seeing a third doctor,
5 Dr. Weingarten, in 2018 who also recommended you
6 receive radiation to treat your cancer?

7 A. I do not remember.

8 (Exhibit 12 marked.)

9 BY MS. KENYON:

10 Q. I'm handing you what I've marked Defense
11 Exhibit 12.

12 Have you seen this letter before?

13 A. No.

14 Q. Do you see at the top, the date it reads
15 August 29th, 2018?

16 A. Yes.

17 Q. And in the middle there, it says,
18 Randall T. Weingarten, M.D. Do you see that?

19 A. Yes.

20 Q. And it's dated August 22, 2018?

21 A. Yes.

22 Q. And this is a letter to Dr. Wikler from
23 Dr. Weingarten. Do you understand that? Is that a
24 "yes"?

25 A. Yes. Yes.

1 Q. And the "Re" line, it reads, "Sandra
2 Camacho." Do you see where I'm at?

3 A. Where does it say Weingarten?

4 Q. Right at the top here it says,
5 "Dr. Randall Weingarten," and then at the bottom
6 "Sincerely, Randall Weingarten, M.D."

7 So are you following?

8 A. Yes.

9 Q. And it reads, Dear Eric, I had the
10 pleasure of seeing your patient, Sandra Camacho, on
11 8/22/18. She is a 72-year old woman who is status
12 post total laryngectomy. She comes in for routine
13 follow-up. She has refused her external beam
14 radiation."

15 Did I read that correctly?

16 A. What's "post"?

17 Q. So this letter is after your total
18 laryngectomy. So Dr. Weingarten is seeing you after
19 your total laryngectomy.

20 And all I'm asking is, did I read that
21 line of the record correctly? That first paragraph,
22 did I read it correctly? My question is simply did
23 I read it correctly?

24 A. I do not remember.

25 Q. So all I'm asking is if I read that

1 correctly?

2 A. Don't know when, but I did refuse both
3 because doctors said they were sure they got it all,
4 and left it up to me, and I said, "If you doctors
5 feel that way, then no."

6 Q. Okay. So then my next question is -- so
7 can you take a look at this record again from
8 Dr. Weingarten, the very last paragraph. Do you see
9 where I'm at? Can you follow along with me?

10 "My impression is that Sandra is status
11 post total laryngectomy. She is currently doing well
12 with no evidence of neck disease recurrence, and the
13 stoma is intact and looks clean. I am unclear as to
14 why she is refusing to follow up with an oncologist
15 for radiation therapy. I have stressed the
16 importance to both her and her husband for her to
17 get external beam radiation."

18 Did I read that correctly?

19 A. Yes. I do not remember.

20 Q. Do you recall telling your doctors in
21 2018 that you were refusing radiation even though
22 they recommended it?

23 MS. WALD: Form.

24 THE WITNESS: Don't know when, but I did
25 refuse both because doctors said they were sure they

1 got it all and left it up to me, and I said, "If you
2 doctors feel that way, then no."

3 BY MS. KENYON:

4 Q. Would seeing your medical records from
5 your doctors telling you to get radiation, help you
6 recall that they were recommending that you, in
7 fact, receive radiation?

8 A. They did say that, but didn't think I
9 needed it. Left it up to me.

10 Q. Are you the type of person who makes
11 your own decisions about your healthcare?

12 MS. WALD: Form.

13 THE WITNESS: Not now.

14 BY MS. KENYON:

15 Q. Have you been the type of person who
16 makes your own healthcare decisions?

17 MS. WALD: Form.

18 THE WITNESS: Used to.

19 BY MS. KENYON:

20 Q. And a person can accept or refuse any
21 treatment that their doctor advises, correct?

22 MS. WALD: Form.

23 THE WITNESS: Yes.

24 BY MS. KENYON:

25 Q. Because, ultimately, a person is

1 responsible for their own health and making their
2 own decisions about their health?

3 MS. WALD: Form.

4 THE WITNESS: No.

5 BY MS. KENYON:

6 Q. You don't think a person has -- you
7 don't think a person has responsibility for their
8 own health?

9 MS. WALD: Form. Asked and answered.

10 THE WITNESS: Both doctor and patient.

11 BY MS. KENYON:

12 Q. You have refused vaccinations that have
13 been recommended to you by your doctors; is that
14 right?

15 MS. WALD: Form. Mischaracterizes
16 testimony.

17 THE WITNESS: You're confusing me.

18 MS. KENYON: Let's go off the record and
19 take a break.

20 THE VIDEOGRAPHER: The time is 9:53. We
21 are going off the record.

22 (A recess is taken.)

23 THE VIDEOGRAPHER: The time is 10:01.

24 We are back on the record.

25 ///

1 BY MS. KENYON:

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

3 A. Okay. Yes.

4 Q. Have you ever refused to get the flu
5 vaccine?

6 A. I do not remember.

7 Q. Have you ever refused to get the
8 shingles vaccine?

9 A. I do not remember.

10 Q. Do you recall whether you've refused to
11 get any vaccinations that your doctors have
12 recommended?

13 A. COVID.

14 Q. Why have you refused to get the COVID-19
15 vaccine?

16 MS. WALD: Form.

17 THE WITNESS: Cancer doctor said if it
18 was my body, no. Then Wilkers (sic) tells me I
19 should. 50/50 chance I would die because I am
20 allergic to things.

21 BY MS. KENYON:

22 Q. So Dr. Wilker has told you that you
23 should get the COVID vaccine?

24 A. Yes.

25 Q. But ultimately you have made a choice

1 not to get the COVID-19 vaccine?

2 MS. WALD: Form.

3 THE WITNESS: Yes. Don't want to die.

4 BY MS. KENYON:

5 Q. Are you concerned about dying from COVID
6 given your current health status?

7 MS. WALD: Form.

8 THE WITNESS: No.

9 BY MS. KENYON:

10 Q. What are you allergic to?

11 A. I do know penicillin. Don't remember
12 rest.

13 Q. Do you know whether there's any
14 penicillin in the COVID-19 vaccine?

15 A. No.

16 Q. Have you talked to your doctors about
17 your -- about that?

18 A. I told Wikler I don't want it.

19 Q. Have you refused to get recommended
20 yearly screenings like mammograms?

21 A. No.

22 Q. You've never refused to see a urologist
23 for yearly screenings?

24 A. What's a urologist?

25 Q. If you don't know, that's fine.

1 Have you ever refused a colorectal
2 cancer screening?

3 A. No.

4 Q. So we were discussing what happened
5 after your total laryngectomy in 2018.

6 So after your surgery, you were in
7 remission, right?

8 A. Yes.

9 Q. And then in July of 2019, did you go to
10 your doctor for follow-up because you were having
11 trouble swallowing?

12 A. I do not remember.

13 Q. Do you recall seeing Dr. Weingarten in
14 July of 2019?

15 A. I do not remember.

16 Q. Do you recall in July of 2019
17 Dr. Weingarten finding a mass in your neck?

18 A. I do not remember.

19 Q. Do you remember Dr. Weingarten telling
20 you that he felt you had had a recurrence of your
21 laryngeal cancer?

22 A. I do not remember.

23 Q. Do you recall what treatment options
24 your doctors recommended in July of 2019?

25 A. I do not remember.

1 Q. Do you recall them recommending that you
2 undergo radiation and chemotherapy?

3 A. I know I had it.

4 Q. So what changed from 2018 when you
5 refused radiation to 2019?

6 A. Doctor.

7 Q. What do you mean?

8 A. He was sure. No if or buts.

9 Q. Can you write it down?

10 A. That's what I am told by daughter.

11 Q. What doctor are you referring to?

12 MS. HENNINGER: Daughter.

13 MS. LUTHER: Daughter.

14 THE WITNESS: All.

15 BY MS. KENYON:

16 Q. So when you were saying that's what your
17 doctor told you, that he was sure if -- no if, and
18 or buts, what doctor are you referring to?

19 A. I do not remember.

20 Q. Did your daughter go with you to your
21 appointments?

22 A. I do not remember.

23 Q. So why would -- or how did your daughter
24 know or why would she tell you that?

25 A. She knows. She said it's best I don't

1 know about surgery cancer. I do not remember.

2 Q. Your daughter told you it was best that
3 you not know about your cancer or surgery? Am I
4 understanding you?

5 A. That I don't remember both, cancer and
6 surgery.

7 Q. So I was asking you about radiation and
8 chemotherapy. Did your doctor go with you to any of
9 your appointments?

10 MS. LUTHER: Doctor? Daughter.

11 MS. KENYON: Too many Ds.

12 BY MS. KENYON:

13 Q. Did your daughter go with you to any of
14 your doctor appointments?

15 A. I do not remember.

16 Q. Has your daughter talked to any of your
17 doctors?

18 A. I do not know. I do not remember.

19 Q. Did you talk to your daughter about
20 whether you should receive radiation and chemo?

21 A. I do not remember.

22 Q. Do you know when you received radiation
23 and chemotherapy?

24 A. No.

25 Q. Do you know how many radiation

1 treatments you received?

2 A. They said nine weeks of both.

3 Q. Who said nine weeks?

4 A. Tony.

5 Q. How did you tolerate the radiation
6 treatments?

7 A. I do not remember.

8 Q. Did you have any side effects from the
9 radiation?

10 THE INTERPRETER: I'm sorry?

11 THE WITNESS: Yes. Yes.

12 BY MS. KENYON:

13 Q. What?

14 A. Memory loss, forgetful, jumpy, cry.

15 Q. Did you speak with your doctors about
16 those possible risks before you received radiation?

17 A. I do not remember.

18 Q. Have you talked with any of your doctors
19 about those issues?

20 A. I do not remember.

21 Q. Since receiving radiation and chemo,
22 have you talked with any of your doctors about
23 memory issues?

24 A. I do not know. I do not remember.

25 Q. You said you also underwent -- you had

1 chemotherapy treatments, correct?

2 A. Yes.

3 Q. And you received those during the nine
4 weeks?

5 A. Yes.

6 Q. How did you tolerate your chemotherapy
7 treatments?

8 A. I do not remember.

9 Q. You're currently cancer free; is that
10 right?

11 A. Yes.

12 Q. You've been in remission for almost
13 three years?

14 A. I guess so.

15 Q. When is your next follow-up scan?

16 A. I forgot.

17 Q. Have any of your doctors told you what
18 your prognosis is?

19 A. I do not remember.

20 Q. Did you ever ask any of your doctors
21 what caused your laryngeal cancer?

22 A. I don't know. I do not remember.

23 Q. Did any of your doctors ever tell you
24 that your laryngeal cancer was caused by smoking?

25 A. I do not remember.

1 Q. Switching gears a little bit. Yesterday
2 we talked about a news story you saw in the late
3 '80s or early '90s where the tobacco companies were
4 speaking.

5 MS. WALD: Objection. We've covered
6 this now in three different depositions, and if
7 you're just going to be getting her to change her
8 testimony now, I'm putting it on the record that we
9 have extensively covered this, and the reason that
10 you were given additional time and additional hours
11 is to cover new topics.

12 I can point to all the page and lines
13 that we've done this extensively for -- I don't
14 know -- going on ten hours now, and she's testified
15 to this multiple times. So I'll give you have a
16 very short leash here, but she's already testified
17 to all of this extensively.

18 MS. KENYON: Please just limit it to
19 objection. We can take a minute off our time for
20 that spiel.

21 BY MS. KENYON:

22 Q. Do you recall what tobacco companies
23 were present?

24 MS. WALD: Object to form. Asked and
25 answered.

1 BY MS. KENYON:

2 Q. Go ahead.

3 A. Quite a few from tobacco company.

4 Q. Do you recall what specific tobacco
5 companies you saw?

6 MS. WALD: Form. Asked and answered.

7 THE WITNESS: I do not remember.

8 BY MS. KENYON:

9 Q. Do you recall what a specific tobacco
10 company said?

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

13 BY MS. KENYON:

14 Q. You can go ahead and answer.

15 A. Don't know which one said it, but said
16 no proof cigarettes are harmful.

17 Q. Do you recall ever reading, hearing or
18 seeing a specific statement about smoking and health
19 from Philip Morris USA?

20 MS. WALD: Form. Asked and answered.

21 THE WITNESS: That was on all news.

22 BY MS. KENYON:

23 Q. If you could listen to my question.

24 Do you recall ever reading, hearing or
25 seeing a specific statement from -- about smoking

1 and health from Philip Morris USA?

2 MS. WALD: Form.

3 THE WITNESS: A cigarette on billboard.

4 BY MS. KENYON:

5 Q. We discussed that yesterday. My
6 question is different.

7 Do you recall ever reading, hearing or
8 seeing a specific statement about smoking and health
9 from Philip Morris USA?

10 MS. WALD: Form. Asked and answered.

11 THE WITNESS: Like I said, don't know
12 names.

13 BY MS. KENYON:

14 Q. So is the answer to my question, no, you
15 don't recall reading, hearing or seeing a specific
16 statement about smoking and health from Philip
17 Morris USA?

18 MS. WALD: Form.

19 THE WITNESS: I do not understand the
20 question. I do not remember. I do not know.

21 BY MS. KENYON:

22 Q. Do you recall reading, hearing or seeing
23 a specific statement about smoking and health from
24 R. J. Reynolds Tobacco Company?

25 MS. WALD: Object to form. Instructing

1 my client not to answer. You asked this identical
2 question yesterday. She's not repeating her
3 answers, same answers. I'm instructing you not to
4 answer.

5 BY MS. KENYON:

6 Q. Do you recall reading, hearing --

7 MS. HENNINGER: What's the basis?

8 MS. WALD: She asked this identical
9 question yesterday.

10 MS. HENNINGER: Okay. So asked and
11 answered is the basis for your instruction not to
12 answer?

13 MS. WALD: Correct. We're --

14 MS. HENNINGER: That's all I want.

15 That's all I want.

16 MS. WALD: We're now in the ten hours --
17 ten hours of additional time --

18 MS. HENNINGER: I clarified it. Thank
19 you. That's it.

20 MS. WALD: -- discovery commissioner
21 that --

22 MS. KENYON: At this point, I'm just
23 adding time to our time. This is getting
24 ridiculous.

25 MS. WALD: It's not getting ridiculous.

1 I'm allowed to --

2 MS. KENYON: Stop.

3 MS. WALD: And please stop interrupting
4 me. I'm allowed -- I'm allowed to state my
5 objections on the record. You asked for additional
6 time to cover new material. This is not new
7 material. It has been asked and answered multiple
8 times, and I'm allowed to state anything I want on
9 the record.

10 MS. KENYON: Great. And I'm allowed to
11 take additional time because you're taking up my
12 time. Thank you.

13 MS. WALD: You're allowed to take 30
14 seconds.

15 BY MS. KENYON:

16 Q. Do you recall ever reading, hearing or
17 seeing a specific statement about smoking and health
18 from Lorillard Tobacco Company?

19 A. You confused me.

20 Q. Can you just answer my question?

21 MS. WALD: Objection. She's saying
22 you're confusing her.

23 BY MS. KENYON:

24 Q. Sure. I'll restate it.

25 Do you recall reading, hearing or --

1 hold on, wait for me to finish my question, please.

2 Now you're just parroting what your
3 attorney said. This is --

4 MS. HENNINGER: Why don't we take a
5 break?

6 MS. WALD: She's about to write an
7 answer.

8 MS. KENYON: Of what you told her to
9 say.

10 THE WITNESS: I answered many times.
11 Stop.

12 BY MS. KENYON:

13 Q. I'm going to ask my question again. I'm
14 entitled to ask you because this is a new question
15 that you've never been asked.

16 Do you recall reading, hearing or seeing
17 a specific statement about smoking and health from
18 Lorillard Tobacco Company --

19 THE REPORTER: Hold on.

20 BY MS. KENYON:

21 Q. You need to wait until I finish my
22 question. It's a brand new one. Your attorney can
23 search the transcript. I've never asked it.

24 THE REPORTER: I did not get the answer.

25 THE WITNESS: I do not remember. I do

1 not remember.

2 BY MS. KENYON:

3 Q. Do you recall reading, hearing or seeing
4 a specific statement about smoking and health from
5 Brown and Williamson Tobacco Corporation?

6 MS. WALD: Form.

7 THE WITNESS: Like I said, don't
8 remember names, just that no proof cigarettes are
9 harmful, so I smoked believing them liars.

10 BY MS. KENYON:

11 Q. So is the answer to my question that you
12 don't know?

13 A. Don't know who.

14 Q. Do you recall reading, hearing or seeing
15 a specific statement about smoking and health from
16 BAT Industries?

17 A. I do not remember.

18 MS. WALD: Form.

19 BY MS. KENYON:

20 Q. Do you recall reading, hearing or seeing
21 a specific statement about smoking and health from
22 Liggett Group?

23 MS. WALD: Form.

24 THE WITNESS: I do not remember.

25 BY MS. KENYON:

1 Q. Did you ever have any direct
2 communication or contact with any tobacco company?

3 A. You.

4 Q. Did you ever have direct communication
5 or contact with someone from the tobacco companies
6 besides any of the attorneys involved in this case?

7 A. No.

8 Q. Switching gears. Your husband told us
9 yesterday that it was him or your daughter that
10 decided to file this lawsuit. Is that true?

11 A. I do not remember.

12 Q. Did your husband decide to file the
13 lawsuit?

14 MS. WALD: Form.

15 THE WITNESS: I do not remember.

16 BY MS. KENYON:

17 Q. Did you know that someone in your family
18 was reaching out to plaintiff's attorneys about
19 filing a lawsuit?

20 A. Was told afterward.

21 Q. So it was not your idea to file this
22 lawsuit?

23 A. I do not remember.

24 Q. Well, if you were told afterwards, how
25 could it have been your idea?

1 MS. WALD: Form.

2 THE WITNESS: I don't know whose idea.

3 It could have been mine, but I don't remember.

4 BY MS. KENYON:

5 Q. When did you first learn a lawsuit was
6 filed?

7 A. I do not remember.

8 Q. Why was the decision made to bring this
9 lawsuit?

10 A. Because tobacco companies lied, and now
11 I am suffering because of them.

12 Q. In your own words, what should each
13 defendant have done differently to keep your injury
14 from occurring?

15 A. Be honest. Tell the truth.

16 Q. Do you believe that you have some
17 responsibility for your injuries?

18 A. No.

19 Q. Zero responsibility?

20 A. Zero.

21 Q. You chose to smoke your first cigarette?

22 A. Yes.

23 Q. You chose to smoke your second
24 cigarette?

25 A. Yes. Cool thing to do.

1 Q. You chose to smoke your second
2 cigarette?

3 A. Chose first one. Then smoked another
4 and another until I got addicted.

5 Q. Do you have any responsibility for your
6 decision to start smoking?

7 MS. WALD: Form.

8 THE WITNESS: No.

9 BY MS. KENYON:

10 Q. What do you hope to accomplish by filing
11 this lawsuit?

12 A. That the truth comes out.

13 Q. What truth? What truth needs to come
14 out now?

15 A. That I have lara- --

16 Q. Did you write laryngectomy?

17 A. That I have laryngectomy because tobacco
18 company lied all these years.

19 Q. Do you believe the tobacco companies
20 were at fault for your decision not to try harder to
21 quit?

22 MS. WALD: Form.

23 THE WITNESS: I tried many, many times.
24 Was addicted.

25 BY MS. KENYON:

1 Q. Who else do you blame besides the
2 tobacco companies and Silverado Smokes for the
3 injuries in this case?

4 A. I blame tobacco companies. They are the
5 main fault for lying.

6 Q. Do you blame the government for allowing
7 cigarettes to be legal?

8 A. I do not know.

9 Q. Do you blame the farmers that --

10 A. I blame tobacco companies, period. They
11 lied to not just me but everyone that smokes.

12 Q. Do you blame the farmers that grew the
13 tobacco? You can just answer my question. Do you
14 blame the tobacco farmers that grew the tobacco?

15 A. No.

16 Q. What about other retailers that sold
17 cigarettes?

18 MS. WALD: Form.

19 THE WITNESS: If they knew it was
20 harmful, yes, I do.

21 BY MS. KENYON:

22 Q. Are you to blame for selling cigarettes
23 at 7-Eleven and Texaco?

24 MS. WALD: Form.

25 THE WITNESS: No, because I thought they

1 were safe.

2 BY MS. KENYON:

3 Q. Have you talked to any doctors or
4 experts that have been hired by your attorneys in
5 this case? Have you talked to any doctors or
6 experts that have been hired by your attorneys in
7 this case?

8 A. No.

9 Q. Have you heard of a doctor named
10 Dr. Prochaska?

11 A. No.

12 Q. Have you talked to any of your doctors
13 about what, if any, treatments you need in the
14 future?

15 A. About what?

16 Q. Have you talked to any of your doctors
17 about what, if any, treatments you may need for your
18 cancer in the future?

19 A. I do know every four or five months, I
20 need open wider, scan every six months.

21 MS. WALD: Are you trying to mouth
22 "esophagus"?

23 THE WITNESS: (Nods head in the
24 affirmative.)

25 BY MS. KENYON:

1 Q. So every four or five months, you need
2 your esophagus open wider to swallow; is that right?

3 A. Yes.

4 Q. Do you know how long that will have to
5 continue?

6 A. Till I die.

7 Q. Are you seeking compensation -- well,
8 strike that.

9 Do you know how long you have to receive
10 cancer scans or cancer screening?

11 A. I do not remember. I do not know.

12 Q. Are you seeking compensation for your
13 medical expenses?

14 MS. WALD: Form.

15 THE WITNESS: No.

16 MS. WALD: And just for the record, she
17 is. She's not a lawyer here. So, I mean, she's
18 going to -- but we are seeking medical expenses.

19 BY MS. KENYON:

20 Q. What amount of your medical expenses
21 have you had to pay out of pocket versus being
22 covered by insurance?

23 A. Ask lawyer.

24 Q. So your lawyer knows what medical
25 expenses you paid out of pocket?

1 A. You both have medical records.

2 Q. Have you kept any receipts for medical
3 expenses you've had to pay out of pocket or bills?

4 A. Some. Daughter takes care of that.

5 Q. Does your daughter pay for any of your
6 medical bills?

7 A. Yes, had to ask my ex for help and
8 family members.

9 Q. You had to ask your ex or your daughter
10 did? Can you write it?

11 A. Daughter. When she told him about me,
12 he helped her.

13 Q. Do you know how much your ex-husband has
14 given Laura to pay your medical bills?

15 A. No.

16 Q. Do you know when she asked your
17 ex-husband for financial help to pay your bills?

18 A. No.

19 Q. Do you receive Medicare benefits? Do
20 you receive Medicare benefits?

21 A. I am on Medicare.

22 Q. Do you receive income from Social
23 Security?

24 A. Yes.

25 Q. Are you seeking compensation for future

1 medical expenses?

2 MS. WALD: Object to form.

3 BY MS. KENYON:

4 Q. You can answer.

5 MS. WALD: You can answer if it's not
6 based on conversations you and I have had.

7 THE WITNESS: No amount of money will
8 bring me back to myself. I'm sure it would help
9 with me and Tony.

10 BY MS. KENYON:

11 Q. What amount of money would compensate
12 you?

13 A. I do not know.

14 Q. Is there anyone who would know better
15 than you?

16 MS. WALD: Form.

17 THE WITNESS: Maybe lawyer. I don't
18 know. Up to jury, I guess.

19 BY MS. KENYON:

20 Q. So you think your lawyer is in a better
21 position to provide a reasonable amount that would
22 fully compensate you?

23 MS. WALD: Form.

24 THE WITNESS: Lawyer and jury will know.
25 I don't know.

1 BY MS. KENYON:

2 Q. You are not seeking to recover for lost
3 wages, correct?

4 MS. WALD: We will stipulate to that;
5 she's not seeking lost wages.

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

7 THE VIDEOGRAPHER: The time is 10:52.
8 We are going off the record.

9 (A discussion is held off the record.)

10 THE VIDEOGRAPHER: The time is 11:03.
11 We are back on the record.

12 MS. KENYON: Mrs. Camacho, thank you so
13 much for your time. I don't have any further
14 questions.

15 MS. LUTHER: She just said she doesn't
16 have any more questions.

17 EXAMINATION

18 BY MS. LUTHER:

19 Q. So now it's my turn. I feel like we're
20 old friends at this point because we've seen each
21 other so many times.

22 But my name is Kelly Luther, and I
23 represent the Defendant Liggett Group, LLC. Okay.

24 Can you point to okay, please?

25 A. Okay.

1 Q. Thank you. I do not have a clear mask
2 like Ms. Kenyon did. Can you hear me okay?

3 A. Yes. Okay.

4 Q. If it becomes a problem, let me know.
5 Okay?

6 A. Okay.

7 Q. But even if you can't hear me, the court
8 reporter can, and you should be able to read my
9 questions. Oh, I'm too loud?

10 MS. WALD: No, I think she wanted you to
11 slow.

12 BY MS. LUTHER:

13 Q. Okay. Yesterday when we were here for
14 your husband's deposition, some people stopped by
15 the house. Who were they?

16 A. I do not know.

17 Q. You didn't recognize them when you
18 looked through the window?

19 MS. WALD: Can you point to your answer?

20 THE WITNESS: No.

21 BY MS. LUTHER:

22 Q. You graduated high school in 1964,
23 correct?

24 A. Yes.

25 Q. And you also had your first cigarette

1 that same year, right, in 1964?

2 A. Yes.

3 Q. And you got that first cigarette from
4 your girlfriend, right?

5 A. Yes.

6 Q. And that cigarette was an L&M brand
7 cigarette, right?

8 A. Yes.

9 Q. Do you know why your girlfriend chose to
10 smoke L&M?

11 A. Yes.

12 Q. And why was that?

13 A. She said she thought they were safer --
14 or safe.

15 Q. Is it safe or safer?

16 A. Safe.

17 Q. Safe?

18 A. Safe.

19 Q. Is that a conversation you remember
20 having with your girlfriend, that she told you that
21 L&M were safe?

22 A. Yes.

23 Q. Can you remember any other details about
24 that conversation?

25 A. No.

1 Q. But before you had that first cigarette,
2 your girlfriend told you that the L&M was safe; is
3 that right?

4 A. Yes.

5 Q. That same day that you tried your first
6 cigarette, there were other people with you,
7 correct?

8 A. Yes.

9 Q. And was everybody smoking?

10 A. Yes.

11 Q. There were no holdouts? Nobody who
12 said, "No, I don't want to smoke"?

13 A. There were only four or three. We all
14 smoked.

15 Q. Did you have any friends at that time
16 who were not smokers?

17 A. No.

18 Q. Of the three or four people who were
19 there, was everybody smoking L&M or were they
20 smoking other brands, as well?

21 A. I do not know.

22 Q. Why is it that you took the cigarette
23 from the girlfriend who was smoking the L&M?

24 A. Because it was cool at that time to
25 smoke.

1 Q. If your girlfriend had been smoking a
2 brand other than L&M, would you have smoked that
3 instead?

4 MS. WALD: Form.

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

7 BY MS. LUTHER:

8 Q. And then through the years, you
9 continued to smoke L&M until you moved to Nevada,
10 right?

11 A. Yes.

12 Q. And you continued to smoke L&M because
13 it was what you were familiar with, right?

14 MS. WALD: Form.

15 THE WITNESS: Yes.

16 BY MS. LUTHER:

17 Q. I have a vague recollection that at one
18 of your earlier sessions you said that one of the
19 friends who was with you that day smoked an
20 unfiltered cigarette.

21 Do you recall telling us that?

22 A. No.

23 Q. Do you recall telling us that you tried
24 an unfiltered cigarette that day?

25 A. Don't remember when, but took a puff of

1 nonfilter.

2 Q. Was that after you started smoking
3 regularly?

4 MS. WALD: Form.

5 BY MS. LUTHER:

6 Q. Point. Thank you.

7 A. Yes.

8 Q. And as I recall, you started smoking L&M
9 because it was filtered, right?

10 MS. WALD: Form.

11 THE WITNESS: Yes.

12 BY MS. LUTHER:

13 Q. And you thought filtered cigarettes were
14 safe?

15 MS. WALD: Form.

16 THE WITNESS: Yes.

17 BY MS. LUTHER:

18 Q. If that's so, why did you try an
19 unfiltered cigarette?

20 A. Curiosity.

21 Q. Both of your parents smoked unfiltered
22 cigarettes, right?

23 A. Yes.

24 Q. Did you ever talk to your parents about
25 the fact that filtered cigarettes were safer and

1 they should switch?

2 A. No.

3 Q. How come?

4 A. We just never did talk about it.

5 Q. Weren't you concerned about your
6 parents' health?

7 MS. WALD: Form.

8 THE WITNESS: Looking back, they
9 themselves didn't probably know it was harmful.

10 BY MS. LUTHER:

11 Q. Understood. But you -- you personally
12 thought that smoking a filtered cigarette was better
13 for your health than smoking an unfiltered
14 cigarette, right?

15 A. That's me.

16 Q. But you didn't feel that you should
17 share that information with your parents?

18 MS. WALD: Form.

19 THE WITNESS: No.

20 BY MS. LUTHER:

21 Q. You --

22 A. I'm sure they thought they were safe,
23 too.

24 Q. But you never had that conversation with
25 your parents, right? Can you point, please.

1 A. No.

2 Q. No you didn't have that conversation?

3 A. No.

4 Q. You earlier testified that you believed
5 L&M was safer because it had less nicotine.

6 Do you recall giving that testimony?

7 MS. WALD: Form.

8 THE WITNESS: Yes.

9 BY MS. LUTHER:

10 Q. How much nicotine did the L&M -- okay.

11 A. I just thought they were safer. Don't
12 remember nicotine.

13 Q. Okay. So if you said that you thought
14 they were safer because they had less nicotine
15 earlier, that's not your testimony today?

16 MS. WALD: Form.

17 THE WITNESS: It makes sense nonfilter
18 would have more.

19 BY MS. LUTHER:

20 Q. Did you -- why don't you clear off your
21 board there. You got full.

22 Did you ever compare the levels of
23 nicotine in the cigarettes that you smoked to other
24 brands that were available?

25 MS. WALD: Form.

1 THE WITNESS: No.

2 BY MS. LUTHER:

3 Q. Are you aware that there were brands
4 with less nicotine on the market at the times that
5 you were smoking L&M?

6 MS. WALD: Form.

7 THE WITNESS: I do not remember.

8 BY MS. LUTHER:

9 Q. Did you like the flavor of L&M?

10 A. No.

11 Q. Then why did you keep smoking it?

12 MS. WALD: Form.

13 THE WITNESS: Got addicted to having a
14 cigarette.

15 BY MS. LUTHER:

16 Q. When you -- when you had that very first
17 L&M, did you like the way that cigarette tasted?

18 MS. WALD: Form.

19 THE WITNESS: I do not remember.

20 BY MS. LUTHER:

21 Q. If you -- you done? If you had not
22 liked the way L&M tasted with that first cigarette,
23 you would have been able to stop then, right?

24 MS. WALD: Form.

25 THE WITNESS: No.

1 BY MS. LUTHER:

2 Q. So can you explain that, please?

3 A. All I know is that after first
4 cigarette, I wanted -- I wanted and then -- after
5 the first cigarette, I wanted another and then
6 another.

7 Q. Did you inhale when you smoked that
8 first cigarette?

9 A. Yes.

10 Q. And did you smoke the entire first
11 cigarette?

12 A. Yes.

13 Q. Did you ever think of trying a cigarette
14 that you thought might taste better instead of
15 continuing to smoke a cigarette that you didn't like
16 the taste of?

17 A. There is only two kinds of cigarette,
18 menthol or regular, so all regular tastes the same.

19 Q. You eventually tried Marlboro and Basic,
20 right?

21 A. Yes.

22 Q. Did L&M, Marlboro and Basic all taste
23 the same to you?

24 A. Yes.

25 Q. You've testified a couple of times

1 through the course of your deposition that you did
2 not enjoy smoking.

3 MS. WALD: Form.

4 BY MS. LUTHER:

5 Q. Do you recall that?

6 A. Yes.

7 Q. At what point was it that you realized
8 you did not enjoy smoking?

9 MS. WALD: Form.

10 THE WITNESS: My very first cigarette
11 was my choice. After that downhill, wanted more.

12 BY MS. LUTHER:

13 Q. All right. But I don't think that
14 answers my question. At what point did you realize
15 you didn't enjoy smoking?

16 MS. WALD: Form.

17 THE WITNESS: I was already addicted to
18 ever think about not enjoying a cigarette.

19 BY MS. LUTHER:

20 Q. So you did enjoy smoking?

21 MS. WALD: Form.

22 BY MS. LUTHER:

23 Q. You enjoyed the first one?

24 A. (Nods head in the affirmative.)

25 MS. WALD: Form.

1 BY MS. LUTHER:

2 Q. And every cigarette after that first
3 one, you did not enjoy?

4 A. No.

5 Q. My question wasn't good. Was that
6 statement correct, that you did not enjoy every
7 cigarette after the first cigarette?

8 A. I would say it took only one or two to
9 get addicted.

10 Q. I understand that you feel you were
11 addicted after the very first cigarette. But that's
12 not the question I'm asking.

13 You said that you didn't enjoy smoking,
14 right? Is that right? Could you point?

15 MS. WALD: Sandra, just point or write
16 it down.

17 BY MS. LUTHER:

18 Q. I'll ask you another question. How's
19 that?

20 You enjoyed the first cigarette, right?
21 Point.

22 A. Yes.

23 Q. After that very first cigarette, you no
24 longer enjoyed smoking; is that right?

25 MS. WALD: Form.

1 THE WITNESS: It was the thing to do at
2 the time, smoke.

3 BY MS. LUTHER:

4 Q. I understand. Let's try this one more
5 time. Do you -- have you understood my question?
6 I'm asking you about when you first realized you
7 didn't enjoy smoking, when you first knew that.

8 A. I do not remember.

9 Q. Do you think it was within the first
10 five years that you were smoking?

11 MS. WALD: Form.

12 THE WITNESS: I do not remember. I do
13 not know.

14 BY MS. LUTHER:

15 Q. Do you think it was when you were living
16 in Chicago or the Illinois area?

17 MS. WALD: Form.

18 THE WITNESS: I do not remember.

19 BY MS. LUTHER:

20 Q. Can you put any sort of time frame on it
21 as to when you first realized you no longer enjoyed
22 smoking?

23 A. No.

24 Q. All right. You mentioned that your
25 sister Donna quit?

1 A. Yes.

2 Q. Do you believe Donna was addicted?

3 MS. WALD: Form.

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

6 BY MS. LUTHER:

7 Q. But at least by Donna's example, you
8 knew that it was possible to quit smoking, right?

9 A. No.

10 Q. The fact that Donna was able to quit
11 didn't explain that to you?

12 MS. WALD: Form.

13 THE WITNESS: I do not know. I do not
14 remember.

15 BY MS. LUTHER:

16 Q. Okay. Have any of your physicians told
17 you that there's anything you can do to help with
18 your memory issues?

19 MS. WALD: Form.

20 THE WITNESS: They are gone for good.

21 BY MS. LUTHER:

22 Q. The doctors told you that?

23 MS. WALD: Form.

24 BY MS. LUTHER:

25 Q. Your doctors told you that?

1 MS. WALD: Form.

2 THE WITNESS: Chemo, radiation.

3 BY MS. LUTHER:

4 Q. I'm asking a slightly different
5 question, though. Have you had that conversation
6 with your doctors where they've told you that the
7 memories are gone for good?

8 A. I do not remember. I didn't make it up.

9 Q. I believe you. I'm sure you didn't.
10 I'm just trying to figure out where you got the
11 information from.

12 A. Doctor, I guess. Who else would know?

13 Q. You're the one with the information, so
14 you have to let me know.

15 A. I do not remember.

16 Q. Do you remember whether you talked to
17 your doctors about whether -- wait, wait, wait. Let
18 me get my question out. Just a minute. Let me get
19 my question out.

20 Have you had any conversations with your
21 doctors about whether there's anything you can do to
22 keep your memory from getting worse as time goes on?

23 A. I do not remember.

24 Q. Why did you have a hysterectomy?

25 A. I do not remember. I do know I was 35.

1 Q. Did it have something to do with a
2 health issue in that area? Point.

3 A. I do not remember.

4 Q. Okay. On one of your earlier sessions,
5 we talked about the different equipment that you
6 need. And one of the things that you used is the
7 humidifier, right?

8 A. Yes.

9 Q. When is it that you need to use the
10 humidifier?

11 A. When I get real dry.

12 Q. That happens a lot in Las Vegas?

13 A. Yes.

14 Q. I need to go back to south Florida in
15 the humidity down there.

16 How often a day do you think you need to
17 use the humidifier?

18 A. At least once.

19 Q. We've also talked about the fact that
20 you need to use the suction machine, right?

21 A. Yes.

22 Q. What I'd like to know is are there
23 activities or things that you do that make you need
24 the suction machine more?

25 A. When I try to talk.

1 Q. So is it safe to say that -- do you need
2 a break? Let's go off the record.

3 THE VIDEOGRAPHER: The time is 11:33.
4 We are going off the record.

5 (A recess is taken.)

6 THE VIDEOGRAPHER: The time is 11:35.
7 We are back on the record.

8 BY MS. LUTHER:

9 Q. You doing okay, Mrs. Camacho?

10 A. Okay.

11 Q. I'm not beating up on you, am I? I
12 actually want an answer to that question.

13 During the course of your deposition
14 sessions, would you say that you've needed to
15 suction more than on a normal day because you've
16 been trying to talk more?

17 A. No.

18 MS. LUTHER: Maybe we should break for
19 lunch now.

20 MS. WALD: I think this is just she's
21 getting emotional for the answer she's writing, so.

22 THE WITNESS: If I walk too much when I
23 try to help Tony.

24 BY MS. LUTHER:

25 Q. So you need to suction more when you're

1 walking, when you're active?

2 MS. WALD: Point.

3 BY MS. LUTHER:

4 Q. Yes?

5 A. Yes.

6 Q. Why is it that you don't use an
7 electrolarynx, something to help you talk? Write it
8 out.

9 A. Tried many times. Can't do it.

10 Q. How come?

11 A. I do not know.

12 Q. So when you tried to use it, what
13 problems are you having with it? What's happening?

14 A. Gurgle.

15 Q. Gurgle. So the sound comes out as a
16 gurgle, is that what you're trying to say? Yes?

17 A. Yes.

18 Q. Have you tried more than one type of
19 electrolarynx to see if another type works better
20 than what you tried?

21 MS. WALD: Don't get anything. Just
22 answer the question.

23 THE WITNESS: No.

24 BY MS. LUTHER:

25 Q. Do you have an electrolarynx here?

1 A. Yes.

2 Q. And do you sometimes use it?

3 A. Always try.

4 Q. How often do you try?

5 A. Every day.

6 Q. And apart from the gurgling, are you
7 able to form sounds with it? Are you able to form
8 words?

9 A. I hear myself, but nothing comes out but
10 gurgle.

11 Q. Have you explored getting additional
12 speech therapy to help you with that?

13 A. Nothing will bring my voice box back.

14 Q. I understand that. But have you -- have
15 you actually sought out additional speech therapy to
16 help you learn to use the electrolarynx?

17 A. They showed me how. Only one way to use
18 it.

19 Q. Have you asked your doctors to send you
20 to additional speech therapy?

21 A. No.

22 Q. How come?

23 A. If that don't help, there is not much
24 they can help me with.

25 Q. Have your doctors told you that?

1 A. Yes.

2 Q. Which doctors?

3 A. I do not remember.

4 Q. Was it something a doctor told you
5 recently?

6 A. No.

7 Q. Back around 2019 when you had the
8 surgery?

9 A. When I got the thing.

10 Q. The electrolarynx? Point.

11 A. Yes.

12 Q. And when did you get that? When you
13 were at UCLA?

14 A. Yes.

15 Q. Are you aware that in --

16 MS. WALD: Wait for a question. Okay?

17 BY MS. LUTHER:

18 Q. You good? Are you aware that in 1997,
19 my client, Liggett Group, publicly admitted that
20 smoking caused disease and was addictive?

21 A. I do not remember.

22 Q. Are you aware that in 1998, my client
23 Liggett Group put on all of its cigarette packs a
24 voluntary warning saying -- did I lose you? Did I
25 lose you?

1 A. I do not remember.

2 MS. WALD: Wait for her initial
3 question.

4 BY MS. LUTHER:

5 Q. Let me finish. Let me ask it over
6 again. Are you aware that in 1998, my client,
7 Liggett Group, put a voluntary warning on all of
8 its cigarette packs that says smoking is addictive?

9 A. I do not remember.

10 MS. LUTHER: Mrs. Camacho, thank you
11 very much for your time those are all the questions
12 I have for you.

13 MS. HENNINGER: Off the record for a
14 second, please.

15 (A recess is taken.)

16 THE VIDEOGRAPHER: The time is 11:52.
17 We are back on the record.

18 EXAMINATION

19 BY MS. HENNINGER:

20 Q. Good afternoon, Mrs. Camacho -- or it's
21 still morning. Good morning, Mrs. Camacho. My name
22 is Ursula Henninger, and we spent some time
23 together, but we haven't had an opportunity to speak
24 yet.

25 The good news for you is I have very few

1 questions. All right?

2 A. Okay.

3 Q. I represent R. J. Reynolds Tobacco
4 Company. Do you know what brand or brands of
5 cigarettes R. J. Reynolds Tobacco Company makes?

6 A. No.

7 Q. Do you know if you ever smoked a brand
8 made by R. J. Reynolds Tobacco Company?

9 A. No. I do not remember.

10 Q. Do you know which tobacco companies made
11 the cigarettes that you smoked?

12 A. I do not remember.

13 Q. Okay. If you didn't smoke -- let me
14 rephrase.

15 If you never smoked a brand made by
16 R. J. Reynolds, do you blame them for your laryngeal
17 cancer?

18 MS. WALD: Form.

19 THE WITNESS: I blame all cigarette
20 makers.

21 BY MS. HENNINGER:

22 Q. Fair enough. And that's because,
23 according to your testimony, they didn't tell the
24 truth, correct?

25 A. Yes.

1 Q. And as we sit here today, are you able
2 to say what tobacco company or which tobacco company
3 said what statement?

4 MS. WALD: Form.

5 THE WITNESS: No.

6 BY MS. HENNINGER:

7 Q. So yesterday -- yesterday Ms. Kenyon
8 asked you if you ever saw or heard a statement from
9 R. J. Reynolds, and you replied that there was no
10 proof that they were harmful. Do you remember that?

11 A. Yes.

12 Q. Is it accurate, is it correct to say
13 that you remember a tobacco company saying that, but
14 you just don't know which tobacco company said that?

15 MS. WALD: Form.

16 BY MS. HENNINGER:

17 Q. Can you point?

18 A. Correct.

19 Q. Okay. Now, a little bit ago you told
20 Ms. Luther, the lady in the purple sweater, you told
21 Ms. Luther that you did not like the taste of L&M
22 cigarettes. Do you remember that? The taste.

23 I don't want to confuse you. Is my
24 question confusing?

25 A. I never really tasted anything.

1 Q. You also told Ms. Luther you did not
2 enjoy smoking; is that correct?

3 MS. WALD: Form.

4 THE WITNESS: Correct.

5 BY MS. HENNINGER:

6 Q. My question for you is if you did not
7 like the taste and you did not enjoy cigarettes, why
8 did you keep smoking them in the '60s?

9 MS. WALD: Form.

10 THE WITNESS: Because it was the cool
11 thing to do and everyone was smoking, and I just
12 wanted more.

13 BY MS. HENNINGER:

14 Q. Is that the -- is that true for why you
15 continued to smoke in the '70s?

16 MS. WALD: Form.

17 THE WITNESS: No.

18 BY MS. HENNINGER:

19 Q. Why did you continue to smoke in the
20 '70s?

21 A. I was already addicted to smoking. I
22 tried many times to quit, but no good. Kept wanting
23 one.

24 Q. But you didn't try to quit in the '70s,
25 did you?

1 A. No.

2 Q. And you didn't try to quit in the '80s,
3 did you?

4 A. No.

5 Q. And you didn't try to quit in the '90s,
6 did you?

7 MS. WALD: Form.

8 THE WITNESS: I do not remember.

9 BY MS. HENNINGER:

10 Q. Okay. Give me one second. I think I'm
11 done.

12 MS. WALD: I think she's about to --

13 MS. HENNINGER: Sorry. I didn't realize
14 she was still writing.

15 BY MS. HENNINGER:

16 Q. "It was when I moved to Vegas."

17 A. It was when I moved to Vegas, that I
18 know.

19 Q. I do have a quick question. You told me
20 that your son, John, worked at Supreme Seafood with
21 his father, correct?

22 A. Yes.

23 Q. And you told me -- or you told us on the
24 very first day he had a child. Have you met John's
25 child?

1 A. No.

2 Q. Were you smoking when you were married
3 to your first husband?

4 A. Yes.

5 Q. Did you ever talk with him about your
6 smoking?

7 A. No.

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

9 A. No.

10 Q. Was he smoking?

11 A. I do not remember.

12 Q. You don't think so. You were wording
13 that; is that correct? You said you don't think so?

14 MS. WALD: Point to --

15 THE WITNESS: I do not remember.

16 MS. WALD: Don't guess.

17 BY MS. HENNINGER:

18 Q. Do you remember talking with him -- let
19 me rephrase.

20 Did he ever talk with you about your
21 smoking?

22 A. No.

23 Q. He never asked you to quit?

24 A. No.

25 MS. HENNINGER: Okay. I think those are

1 all of my questions.

2 MS. WALD: All right. Do you want to go
3 off the record?

4 MS. HENNINGER: Yeah, for a second.

5 THE VIDEOGRAPHER: The time is 12:02.
6 We're going off the record.

7 (A recess is taken.)

8 THE VIDEOGRAPHER: The time is 12:04.
9 We are back on the record.

10 EXAMINATION

11 BY MS. WALD:

12 Q. All right. Sandra, so I have a few
13 questions for you. Okay?

14 MS. LUTHER: Kim, objection for one,
15 objection for all?

16 MS. WALD: I was just about to say, yes,
17 no problem.

18 BY MS. WALD:

19 Q. Sandra, you have been going for a little
20 under 12 hours of depositions over four days.

21 MS. KENYON: Form.

22 THE WITNESS: Correct.

23 BY MS. WALD:

24 Q. Are you feeling okay right now?

25 A. Okay.

1 Q. Can you understand me and hear me?

2 A. Yes.

3 Q. If you ever have a problem hearing me,
4 will you let me know?

5 A. Yes.

6 Q. How old are you today?

7 A. 75.

8 Q. What year were you born?

9 A. 1946.

10 Q. Do you have any children?

11 A. Yes, two.

12 Q. What are their names?

13 A. Laura, John.

14 Q. Are you married?

15 A. Yes.

16 Q. What is your husband's name?

17 A. Anthony. I call him Tony.

18 Q. Did you and Tony meet in 1978?

19 A. Yes.

20 Q. What year did you get married?

21 A. 1980.

22 Q. Where were you living when you met Tony?

23 A. River Grove, Illinois.

24 Q. Is that near Chicago?

25 A. Across the street from my home.

1 Q. Did you and Tony move to Las Vegas?

2 A. Yes.

3 Q. What year did you and Tony move to
4 Las Vegas?

5 A. 1990.

6 Q. Okay. Did you also grow up in River
7 Grove, Illinois?

8 A. Yes.

9 Q. Growing up in River Grove, Illinois, in
10 the '50s and '60s, do you remember cigarette
11 advertising?

12 MS. KENYON: Objection.

13 MS. HENNINGER: Object.

14 BY MS. WALD:

15 Q. Can you point to an answer?

16 A. Yes.

17 Q. Where do you remember seeing cigarette
18 advertising?

19 A. Magazine, billboards.

20 Q. Was smoking glamorous?

21 MS. KENYON: Objection.

22 BY MS. WALD:

23 Q. You can answer.

24 A. It was the cool thing to do then.

25 Q. Did everyone smoke?

1 MS. KENYON: Objection.

2 THE WITNESS: Yes.

3 BY MS. WALD:

4 Q. Now, during your deposition that was a
5 little under 12 hours for four days, were you shown
6 any cigarette advertisements?

7 MS. KENYON: Objection.

8 THE WITNESS: No.

9 BY MS. WALD:

10 Q. Would seeing some cigarette
11 advertisements help you remember if you saw
12 advertisements?

13 MS. KENYON: Objection.

14 THE WITNESS: Yes.

15 MS. WALD: I'm going to mark this as
16 Plaintiffs' Composite Exhibit 1.

17 MS. KENYON: Do you have a copy?

18 MS. WALD: I do not. It's two L&M ads.

19 MS. KENYON: May I look at them first?

20 MS. LUTHER: Yeah, me too.

21 BY MS. WALD:

22 Q. I'm handing you what I'm going to mark
23 as Plaintiffs' Composite 1.

24 (Plaintiffs' Exhibit 1 marked.)

25 BY MS. WALD:

1 Q. Can you take a look at Plaintiff's
2 Composite 1. I want to ask you -- let me know when
3 you're ready. Okay. I want to ask you, do you
4 recognize these advertisements? Can you point to an
5 answer?

6 A. Yes.

7 Q. Are these similar types of
8 advertisements that you saw growing up in the '50s
9 and '60s?

10 MS. KENYON: Objection.

11 MS. LUTHER: Form.

12 THE WITNESS: Yes.

13 BY MS. WALD:

14 Q. Do you remember seeing advertisements
15 like this for L&M?

16 MS. KENYON: Objection.

17 THE WITNESS: Yes.

18 BY MS. WALD:

19 Q. Where do you remember seeing these
20 advertisements?

21 A. Mags and billboards.

22 Q. How many times did you see these
23 advertisements or similar advertisements?

24 MS. KENYON: Objection.

25 MS. LUTHER: Form.

1 THE WITNESS: A lot.

2 BY MS. WALD:

3 Q. Do you remember seeing these
4 advertisements or similar ones more than five times?

5 MS. KENYON: Objection.

6 THE WITNESS: Yes.

7 BY MS. WALD:

8 Q. More than ten times?

9 MS. KENYON: Objection.

10 THE WITNESS: Yes.

11 MS. WALD: I'm going to mark this as
12 Plaintiffs' 2.

13 (Plaintiffs' Exhibit 2 marked.)

14 BY MS. WALD:

15 Q. Can you take a look at Plaintiffs' 2 for
16 me, Sandra?

17 A. Yes.

18 Q. Okay. Go ahead and look at all of them.
19 Have you had a chance to look through all of them?

20 A. Yes.

21 Q. Do you recognize what is in Plaintiffs'
22 Exhibit 2?

23 MS. KENYON: Form.

24 BY MS. WALD:

25 Q. Can you write down what you were just

1 mouthing? Show him.

2 A. Marlboro man smoking.

3 Q. Okay. And can you hold up to the camera
4 what you were referring to. Just hold it up, okay?

5 A. (Indicating.)

6 Q. Okay. Thank you, Sandra.

7 Do you remember seeing these
8 advertisements or similar advertisements?

9 MS. KENYON: Form.

10 BY MS. WALD:

11 Q. Can you point to an answer?

12 A. Yes.

13 Q. Where do you remember seeing these
14 advertisements for the Marlboro man?

15 MS. KENYON: Form.

16 THE WITNESS: Billboard, magazines.

17 BY MS. WALD:

18 Q. How many times did you see
19 advertisements for the Marlboro man?

20 MS. KENYON: Form.

21 THE WITNESS: Lots.

22 BY MS. WALD:

23 Q. What do you -- what do you consider
24 lots? Did you see this more than ten times?

25 MS. KENYON: Form.

1 THE WITNESS: Yes.

2 BY MS. WALD:

3 Q. Did you see all sorts of different types
4 of advertisements?

5 MS. KENYON: Form.

6 THE WITNESS: Yes.

7 MS. WALD: We're going to mark this as
8 Plaintiffs' Exhibit 3.

9 (Plaintiffs' Exhibit 3 marked.)

10 BY MS. WALD:

11 Q. Sandra, can you look at Exhibit 3 for
12 me. Look at all three pages. What are you looking
13 at in Exhibit 3? Can you write it down?

14 A. Basin in my -- "Basics with my coffee."

15 Q. Do these ads look familiar to you?

16 MS. KENYON: Form.

17 THE WITNESS: Yes.

18 BY MS. WALD:

19 Q. Do you remember seeing advertisements
20 like this for Basic when you were smoking Basic?

21 MS. KENYON: Form.

22 THE WITNESS: Yes.

23 BY MS. WALD:

24 Q. Where would you see these advertisements
25 for Basic?

1 MS. KENYON: Form.

2 THE WITNESS: Magazine.

3 BY MS. WALD:

4 Q. How many times did you see
5 advertisements for Basic cigarettes?

6 MS. KENYON: Form.

7 THE WITNESS: Lots of times.

8 BY MS. WALD:

9 Q. Does that mean you've seen this more
10 than ten times?

11 MS. KENYON: Form.

12 THE WITNESS: Yes.

13 BY MS. WALD:

14 Q. Were there times growing up in River
15 Grove, Illinois where you saw commercials on
16 television for cigarettes?

17 A. Yes.

18 Q. Would it help you if I showed you a
19 video to see if you remembered? Can you point to an
20 answer?

21 A. Yes. Show me then I probably could
22 remember if you show me.

23 MS. WALD: I'm going to mark this as
24 Plaintiffs' Exhibit 4. I'll send it to you somehow
25 electronically. It's just the very end for "The

1 Call For Philip Morris."

2 MS. KENYON: Can you play it.

3 (Video played.)

4 BY MS. WALD:

5 Q. Okay, Sandra, I'm going to show you a
6 video, okay? Okay. Wait for me to show you the
7 video.

8 (Video played.)

9 A. Yes.

10 Q. She pointed to yes?

11 A. Yes.

12 Q. Seeing this video, do you remember
13 hearing "Call for Philip Morris" on a television
14 growing up?

15 MS. KENYON: Form.

16 THE WITNESS: Yes.

17 BY MS. WALD:

18 Q. Are these commercials from over 50 years
19 ago that you're remembering?

20 MS. KENYON: Objection.

21 MS. LUTHER: Object to the form.

22 THE WITNESS: Yes.

23 BY MS. WALD:

24 Q. I don't have a question, Sandra.

25 How old were you when you first started

1 smoking?

2 MS. HENNINGER: Objection.

3 THE WITNESS: 17 or 18.

4 BY MS. WALD:

5 Q. Would that have -- would that have been
6 around 1964?

7 A. Yes.

8 Q. What brand of cigarette did you first
9 smoke?

10 A. L&M.

11 Q. Why did you smoke an L&M cigarette?

12 A. Because I thought they were safer.

13 Q. How long after you smoked your first
14 cigarette did it take you to become a regular daily
15 smoker?

16 A. Soon.

17 Q. How many packs of cigarettes per day did
18 you smoke throughout your lifetime?

19 MS. KENYON: Form.

20 THE WITNESS: Two packs.

21 BY MS. WALD:

22 Q. When you were in Chicago, how many packs
23 of cigarettes per day did you smoke?

24 MS. KENYON: Form.

25 THE WITNESS: One.

1 BY MS. WALD:

2 Q. When you moved to Las Vegas, how many
3 packs of cigarettes per day did you smoke?

4 MS. KENYON: Form.

5 THE WITNESS: Two.

6 BY MS. WALD:

7 Q. How many years did you smoke L&M
8 cigarettes?

9 A. When I was 17 or 18 till 1990.

10 Q. What brand of cigarette did you switch
11 to in 1990?

12 A. Marlboro.

13 Q. How many years did you smoke Marlboro?

14 A. Ten years. Ten years to 15 years.

15 Q. You seem to get a little confused during
16 that last question. It took you a while to answer.

17 MS. HENNINGER: Objection.

18 MS. KENYON: Form.

19 BY MS. WALD:

20 Q. What brand did you smoke after Marlboro?

21 A. Could not find L&M when I moved here.

22 Then Marlboro was getting expensive. Switched to
23 Basic.

24 Q. Did you smoke Basic cigarettes for a
25 longer period of time than Marlboro cigarettes?

1 A. No.

2 Q. How long did you smoke Basic cigarettes?

3 A. I do not remember.

4 Q. Can you write that down, what you just
5 mouthed?

6 A. Smoked Basic till cancer.

7 Q. So I just want to make sure I'm
8 understanding you. When you moved to Vegas, you
9 smoked Marlboro for a few years and then you
10 switched to Basic until you got sick?

11 MS. KENYON: Form.

12 MS. LUTHER: Form.

13 THE WITNESS: Yes.

14 BY MS. WALD:

15 Q. When you used to smoke when you woke up
16 in the morning, what was the first thing you would
17 do?

18 A. Light a cigarette.

19 Q. How many minutes between waking up until
20 you would light a cigarette?

21 MS. KENYON: Form.

22 THE WITNESS: One hour, maybe sooner.

23 BY MS. WALD:

24 Q. When you woke up in the morning, how
25 long did it take you until you smoked your first

1 cigarette?

2 MS. KENYON: Form.

3 MS. LUTHER: Objection.

4 MS. HENNINGER: Objection.

5 THE WITNESS: One minute to walk to
6 kitchen.

7 BY MS. WALD:

8 Q. You had just written down one hour?

9 MS. KENYON: Form.

10 BY MS. WALD:

11 Q. Right? Can you point?

12 A. THE WITNESS: No.

13 Q. So just so we're clear -- Sandra, it's
14 okay. It's okay. Just look at me, okay. It's been
15 a long day. Okay.

16 MS. KENYON: Form.

17 BY MS. WALD:

18 Q. When you woke up in the morning before
19 you did anything else, what would you do?

20 MS. LUTHER: Form.

21 MS. KENYON: Form.

22 BY MS. WALD:

23 Q. Can you show him?

24 A. Smoke.

25 Q. So it wouldn't take you one hour --

1 MS. KENYON: Form.

2 BY MS. WALD:

3 Q. -- to smoke?

4 A. No. One hour between cigarettes to
5 smoke another.

6 Q. Okay. So if I'm understanding you, you
7 would have a cigarette every hour throughout the
8 day?

9 A. Yes.

10 Q. That's why you wrote 'one hour' on the
11 board?

12 MS. LUTHER: Form.

13 MS. HENNINGER: Form.

14 MS. KENYON: Form.

15 THE WITNESS: Yes.

16 BY MS. WALD:

17 Q. Before you went to work in the morning,
18 how many cigarettes would you have?

19 A. Three.

20 Q. On your drive to work, would you smoke?

21 A. Yes.

22 Q. While you were at work, would you take
23 breaks to smoke?

24 A. Yes.

25 Q. Would you -- strike that.

1 How often would you take breaks at work
2 to smoke?

3 A. Every chance I get. After taking
4 customer order, went back.

5 Q. Did you smoke while you cooked dinner?

6 A. Yes.

7 Q. If you went to a movie theater, could
8 you sit through the entire movie without smoking?

9 A. No.

10 Q. What would you do?

11 A. Go outside and have one.

12 Q. Did you ever burn your clothing with
13 cigarettes?

14 A. Yes.

15 Q. Did you ever burn the car seat with
16 cigarettes?

17 A. Yes.

18 Q. Did you smoke while you were pregnant
19 with John?

20 A. Yes.

21 Q. Did you smoke while you were pregnant
22 with Laura?

23 A. Yes.

24 Q. Did you smoke around Laura when she was
25 pregnant with her children?

1 A. Yes.

2 Q. What was the last thing you did at night
3 before you went to sleep?

4 A. Smoke.

5 Q. Did you ever wake up in the middle of
6 the night to smoke?

7 A. Yes.

8 Q. How many -- how often did you wake up in
9 the middle of the night to smoke?

10 A. Almost every night.

11 Q. Do you know what a chain smoker means?

12 A. Yes.

13 Q. What does that mean to you?

14 A. Light one after another.

15 Q. Did you ever chain smoke?

16 A. Yes.

17 Q. Where were you living when you chain
18 smoked?

19 A. Chicago and here.

20 Q. Sandra, if you were sick with a cold,
21 would you still smoke?

22 MS. KENYON: Form.

23 THE WITNESS: Yes.

24 BY MS. WALD:

25 Q. Did you enjoy smoking?

1 A. First one, yes.

2 Q. After the first one, did you enjoy
3 smoking?

4 A. No.

5 Q. Do you think you were addicted to
6 cigarettes?

7 A. Yes.

8 Q. Even now after everything you've been
9 through and the condition you're in, do you still
10 crave cigarettes?

11 MS. KENYON: Form.

12 THE WITNESS: Yes.

13 BY MS. WALD:

14 Q. Were there times in your life when you
15 tried to quit smoking?

16 A. Yes.

17 Q. When did you first try to quit smoking,
18 what year?

19 A. After moving here.

20 Q. And "here," you mean Las Vegas?

21 A. Yes.

22 Q. How many times in your life did you try
23 to quit smoking?

24 A. Many.

25 Q. Can you put any amount of -- strike

1 that.

2 Can you put a number of times that
3 you've tried to quit smoking?

4 A. All I know, I tried a lot.

5 Q. When you would try, how long could you
6 go without a cigarette?

7 A. One hour.

8 Q. What's the longest you could ever go
9 without a cigarette when you were trying to quit?

10 A. Never made a day.

11 Q. When you would try to quit, would your
12 personality change?

13 A. Yes.

14 Q. Tell me how your personality would
15 change?

16 A. Miserable, mean, anxious.

17 Q. What are some things you used to try to
18 quit smoking?

19 A. Regular gum, Nicorette Gum,
20 e-cigarettes, threw pack in garbage and sometimes
21 crushed them.

22 Q. What would you do with the cigarettes
23 after you through threw them and crushed them in the
24 garbage?

25 A. Because they were almost full packs, I

1 took them out.

2 Q. Took them out of the garbage?

3 A. Yes.

4 Q. Did you want to quit smoking?

5 MS. KENYON: Form.

6 THE WITNESS: Yes.

7 BY MS. WALD:

8 Q. Was there anything you could have tried
9 harder to do to stop smoking?

10 MS. KENYON: Form.

11 THE WITNESS: No.

12 BY MS. WALD:

13 Q. Until you started getting sick, were you
14 able to quit cigarettes for good?

15 MS. KENYON: Form.

16 BY MS. WALD:

17 Q. Until you started getting sick with
18 cancer, were you able to stop smoking for good?

19 MS. KENYON: Same objection.

20 THE WITNESS: I remember I quit when I
21 had surgery.

22 BY MS. WALD:

23 Q. I want to switch topics.

24 When is the first time you knew smoking
25 could be bad for you?

1 A. I do not remember.

2 MS. KENYON: And for the record, she's
3 mouthing "When I had this" and pointing to her
4 throat.

5 MS. WALD: She was just about to write
6 it down.

7 THE WITNESS: When I got cancer.

8 BY MS. WALD:

9 Q. Throughout the years, did you ever hear
10 and rely upon statements from the tobacco companies?

11 MS. KENYON: Objection.

12 MS. HENNINGER: Form.

13 MS. KENYON: Form.

14 MS. LUTHER: Objection.

15 THE WITNESS: Yes.

16 BY MS. WALD:

17 Q. What years do you remember hearing
18 statements from tobacco companies?

19 MS. KENYON: Form.

20 THE WITNESS: It was late '80s, early
21 '90s, on news that there was no proof smoking was
22 bad. So I just kept on smoking. Harmful.

23 BY MS. WALD:

24 Q. Who was making these statements on the
25 news?

1 MS. KENYON: Form.

2 MS. HENNINGER: Objection. Misstates
3 testimony.

4 THE WITNESS: People from tobacco
5 company.

6 BY MS. WALD:

7 Q. How do you know it was people from the
8 tobacco company?

9 MS. KENYON: Form.

10 THE WITNESS: They said it, but I don't
11 remember their names.

12 BY MS. WALD:

13 Q. Wipe the board.

14 How many times did you see these
15 statements from the tobacco companies?

16 MS. KENYON: Form. Mischaracterizes the
17 testimony.

18 BY MS. WALD:

19 Q. You can answer. Can you write it down?

20 A. A lot on all channels.

21 Q. Do you remember hearing this when you
22 were living in River Grove?

23 MS. KENYON: Form.

24 MS. HENNINGER: Objection.

25 BY MS. WALD:

1 Q. You can answer.

2 A. Yes.

3 Q. Do you remember hearing this when you
4 moved to Las Vegas?

5 MS. KENYON: Form.

6 THE WITNESS: Yes.

7 BY MS. WALD:

8 Q. Did you believe what the tobacco company
9 said on the news?

10 MS. KENYON: Form.

11 MS. HENNINGER: Form.

12 THE WITNESS: Yes.

13 BY MS. WALD:

14 Q. Did you continue to smoke because you
15 believed them?

16 MS. KENYON: Form.

17 THE WITNESS: Yes.

18 BY MS. WALD:

19 Q. You were diagnosed with laryngeal cancer
20 in 2018.

21 A. Okay.

22 Q. Did you undergo a total laryngectomy?

23 A. Yes.

24 Q. And does that mean that your voice box
25 had to be removed?

1 A. Yes.

2 Q. I know. These are hard so we're going
3 to go slow. Does that mean that you have a hole in
4 your throat?

5 A. Yes.

6 Q. As a result, are you able to speak?

7 A. No.

8 Q. Can you tell us what a typical day is
9 like for you? I'll keep asking you questions.

10 A. Sleep all night with machine. Wake up.
11 Have to use suction machine throughout the day. Ten
12 missiles a day, morning, night. If stuck, use picks
13 to get rest of it. If I can't get it, Tony does.
14 Humidify a couple times a day.

15 Have to put stoma in every -- have to
16 put stoma in every day for four hours. That is
17 miserable because I cough a lot and suction a lot.

18 Q. Do you do anything for fun?

19 A. No.

20 Q. How is your quality of life?

21 MS. KENYON: Form.

22 MS. HENNINGER: Objection.

23 THE WITNESS: Terrible, but I'm alive.

24 BY MS. WALD:

25 Q. Besides doctors and grocery store and

1 the occasional Dairy Queen, do you leave the house?

2 MS. KENYON: Form.

3 THE WITNESS: Have to go with Tony. No,

4 I don't leave house. Sit in car, Dairy Queen.

5 Food, go with Tony. If Laura or Neil comes, then I

6 don't have to, but my daughter has her own problem

7 plus works.

8 BY MS. WALD:

9 Q. Do you have multiple machines you have
10 to bring with you if you leave the house?

11 A. Yes.

12 Q. Can you be at the house by yourself?

13 A. No.

14 Q. Why not?

15 A. I can't talk, hear, and one eye. If
16 doorbell should ring, I jump.

17 Q. You have a suction machine that you have
18 to use; is that correct?

19 MS. LUTHER: Form.

20 THE WITNESS: Yes. Sometimes I cough
21 too much and forget to turn on machine and can't
22 find hole.

23 BY MS. WALD:

24 Q. When that happens, does Tony help you?

25 A. Yes. He is always around. I clap long

1 (indicating).

2 Q. Are you -- strike that.

3 If you didn't have Tony, who would help
4 you?

5 MS. KENYON: Form.

6 THE WITNESS: I would hope my daughter,
7 but her husband has the disease Michael J. Fox has.

8 BY MS. WALD:

9 Q. Sandra, if you knew as a 17 or 18-year
10 old that smoking cigarettes could cause cancer,
11 would you ever have started to smoke?

12 MS. HENNINGER: Objection.

13 MS. KENYON: Form.

14 MS. LUTHER: Form.

15 THE WITNESS: No.

16 MS. WALD: Okay. Thank you, Sandra,
17 those are all of my questions.

18 MS. HENNINGER: Should we go outside
19 real quick?

20 MS. LUTHER: Yep.

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

22 THE VIDEOGRAPHER: The time is 1:01. We
23 are going off the record.

24 (A recess is taken.)

25 THE VIDEOGRAPHER: The time is 1:12, and

1 we are back on the record.

2 EXAMINATION

3 BY MS. KENYON:

4 Q. All right. Your deposition was taken
5 over four days, correct?

6 A. Correct.

7 Q. But they were not full days, correct?

8 A. No. Correct.

9 Q. Your deposition was taken for two days
10 in November and two days in December, correct?

11 A. Correct.

12 Q. We came to your house so that you would
13 be more comfortable; is that correct?

14 A. Correct.

15 Q. We took breaks whenever you needed one,
16 correct?

17 A. Correct.

18 Q. And we stopped for the day as soon as
19 you needed to, correct?

20 A. Correct.

21 Q. Are you aware that the court ruled that
22 it was appropriate for us to have extra time to
23 complete your deposition?

24 MS. WALD: Form.

25 BY MS. KENYON:

1 Q. You mouthed, "I guess." Can you write
2 it?

3 MS. WALD: Write what you just mouthed.

4 THE WITNESS: I guess.

5 BY MS. KENYON:

6 Q. You were shown a commercial, "Call For
7 Philip Morris." You were shown a commercial, "Call
8 for Philip Morris." Yes?

9 A. Yes.

10 Q. Despite claiming you saw that
11 commercial, you never smoked a Philip Morris brand
12 cigarette, correct?

13 MS. WALD: Form.

14 THE WITNESS: I don't remember what
15 cigarette is from whose company.

16 BY MS. KENYON:

17 Q. So we've gone over you smoked L&M,
18 Marlboro, and Basic cigarettes?

19 A. Correct.

20 Q. You never smoked a Philip Morris brand
21 cigarette, correct?

22 A. I do not know.

23 MS. HENNINGER: Jen, switch it; say
24 "brand called."

25 BY MS. KENYON:

1 Q. You never smoked a brand of cigarettes
2 called Philip Morris?

3 A. No.

4 Q. The "Call for Philip Morris" commercial
5 that Ms. Wald showed you, what was glamorous about
6 that?

7 A. His singing. Outfit.

8 Q. Do you recall what you were watching
9 when that commercial played?

10 A. I do not remember.

11 Q. You were shown some ads by Ms. Wald. So
12 I'm going to hand you back Plaintiffs' Exhibit 2.
13 These are the Marlboro ads.

14 You said you recall seeing these ads?

15 MS. WALD: Write it down.

16 THE WITNESS: Correct.

17 BY MS. KENYON:

18 Q. Do you recall seeing the warning, the
19 Surgeon General warning that's on every single ad
20 that your attorney gave you?

21 A. I do not remember.

22 Q. Well, take a look at that first one. Do
23 you see the Surgeon General warning label very
24 clearly on that ad?

25 A. (Indicating.)

1 Q. Correct. Can you see that?

2 A. I see it now.

3 Q. You weren't paying attention to the
4 warning labels on cigarettes when you were smoking,
5 were you?

6 MS. WALD: Form.

7 THE WITNESS: I do not remember.

8 BY MS. KENYON:

9 Q. Is it because you didn't care?

10 MS. WALD: Form.

11 THE WITNESS: I do not remember. I do
12 not know.

13 BY MS. KENYON:

14 Q. Okay. So -- let me see those for a
15 second. So the warning label on here reads
16 "Quitting smoking now greatly reduces serious risk
17 to your health."

18 But when you saw these ads, you didn't
19 care what the warning label said?

20 MS. WALD: Form. Asked and answered.

21 THE WITNESS: I do not remember.

22 BY MS. KENYON:

23 Q. You didn't -- you did not start --

24 MS. WALD: I think she wanted to write
25 something.

1 THE WITNESS: I remember ads, but the
2 warning label.

3 BY MS. KENYON:

4 Q. Because you weren't paying attention,
5 were you?

6 MS. WALD: Form. Asked and answered.

7 BY MS. KENYON:

8 Q. You wanted to smoke?

9 MS. WALD: Form.

10 THE WITNESS: I did smoke because you
11 people said no proof it was harmful.

12 BY MS. KENYON:

13 Q. Move to strike as nonresponsive.

14 So you didn't smoke Marlboro until 1990.

15 Are you aware that any ad you may have seen would
16 have contained a Surgeon General warning?

17 A. I do not remember.

18 Q. What magazines did you look at as a kid?

19 A. I do not remember.

20 Q. How do you know you even saw ads?

21 MS. WALD: Form.

22 THE WITNESS: I had two eyes then.

23 BY MS. KENYON:

24 Q. Do you recall -- do you remember any ads
25 for other products in magazines?

1 MS. WALD: Form.

2 THE WITNESS: Show me pictures and I
3 maybe could remember.

4 BY MS. KENYON:

5 Q. I'm asking you if you remember seeing
6 ads in magazines for other products?

7 A. I do not remember.

8 Q. You were also shown some ads for Basic
9 cigarettes. I'm going to hand you back Plaintiff
10 Exhibit 2 -- or Exhibit 3. Do you see at the bottom
11 there's a -- do you see the Surgeon General warning
12 label on that ad?

13 A. Yes.

14 Q. Do you want to flip through -- can you
15 flip through and confirm that the Surgeon General
16 warning is on every single Basic ad. Did you see
17 the ad? Did you see the Surgeon General warning on
18 every ad?

19 A. Yes.

20 Q. You didn't start smoking Basic until the
21 2000s sometime. So any ad you may have seen would
22 have contained a Surgeon General warning.

23 Are you aware of that?

24 A. Believe me, I do not remember things
25 about cigarettes. Wish I did.

1 Q. You seem to remember when your attorney
2 was asking you?

3 MS. WALD: Well, objection. That's not
4 a question.

5 MS. KENYON: I'll withdraw my question.

6 MS. WALD: She's not asking a question,
7 Sandra. Wait for a question.

8 BY MS. KENYON:

9 Q. Even though you testified that you crave
10 cigarettes now, you have never smoked another
11 cigarette after your surgery, have you?

12 A. No.

13 MS. WALD: Form.

14 THE WITNESS: Would you?

15 BY MS. KENYON:

16 Q. That -- you told Ms. Wald that you heard
17 statements from tobacco companies in the late '80s
18 or early '90s that there was no proof smoking was
19 harmful so you kept smoking.

20 Did you hear messages on the same news
21 programs that smoking was dangerous?

22 MS. WALD: Form.

23 BY MS. KENYON:

24 Q. Dangerous.

25 A. I do not remember.

1 Q. You said you heard this on a lot of
2 channels. Is it your testimony that it was only the
3 tobacco companies denying that there was no proof
4 that cigarette was dangerous?

5 MS. WALD: Form.

6 THE WITNESS: That's what I saw and
7 heard.

8 BY MS. KENYON:

9 Q. Never heard a news program that smoking
10 was dangerous?

11 MS. WALD: Form.

12 THE WITNESS: I do not know. I do not
13 remember.

14 MS. KENYON: Those are all the questions
15 I have. I believe Ms. Luther is going to have some.

16 MS. LUTHER: I do.

17 MS. WALD: Don't ask any question,
18 Sandra.

19 MS. LUTHER: We're close, really close.

20 EXAMINATION

21 BY MS. LUTHER:

22 Q. These are what were marked by your
23 attorney as Exhibit 1. Okay. I'm going to have to
24 repeat my question because I forgot to put on my
25 microphone.

1 These are the exhibits -- these
2 documents were marked by your attorney as Composite
3 Exhibit 1. They are advertisements for L&M,
4 correct?

5 A. Correct.

6 Q. One advertisement looks like it's an
7 architect; is that right? An architect. If you're
8 not sure, that's fine. Let me see them for just two
9 seconds. Thank you.

10 There isn't an entire person in either
11 of these ads, right? It's just the hands of a man
12 in each of the ads. Do you agree?

13 A. Correct.

14 Q. Is it your testimony that these ads made
15 smoking look cool to you?

16 A. Yes.

17 Q. And what is it about these particular
18 ads that made smoking look cool to you?

19 A. They were all over billboards,
20 magazines.

21 Q. So is it just the fact that they were
22 published that you think made them look cool?

23 A. It looked cool.

24 Q. But what about these particular ads?
25 You think that's cool?

1 MS. WALD: Form.

2 THE WITNESS: People golfing, smoking,
3 other one, drawing, smoking.

4 BY MS. LUTHER:

5 Q. Were you ever interested in golfing?
6 Were you ever --

7 MS. WALD: I don't think she answered.

8 THE WITNESS: No.

9 BY MS. LUTHER:

10 Q. Sorry. I take that back. Were you ever
11 interested in golf?

12 A. No.

13 Q. And were you ever interested in drawing?

14 A. I did like to draw when young. Not now.

15 Q. Do you know what an architect is?

16 A. (Nods head in the affirmative.)

17 Q. Did you ever want to be an architect.

18 A. Yes.

19 MS. WALD: You asked two questions in
20 one. She was answering yes to your second one.

21 BY MS. LUTHER:

22 Q. You know what an architect is?

23 A. Yes.

24 Q. And I have to retract my statement
25 because after looking --

1 MS. WALD: She just wants to clarify
2 that she doesn't want to be an architect, I think.

3 BY MS. LUTHER:

4 Q. You never wanted to be an architect?

5 A. (Shakes head in the negative.)

6 Q. There you go. And looking at this
7 closer, it has nothing to do with being an
8 architect, it's a person charting --

9 MS. WALD: Let her ask the question,
10 Sandra.

11 BY MS. LUTHER:

12 Q. Do you know what this ad is, what's
13 depicted in that top ad?

14 MS. WALD: Form.

15 BY MS. LUTHER:

16 Q. He's on a boat? Can you point? He's
17 charting a course on a boat, is that what the ad is?

18 A. On a boat.

19 Q. Okay. Did you ever want to be a boat
20 captain?

21 A. No, but enjoyed boat rides.

22 Q. Me too. As long as it's someone else's
23 boat.

24 Do you remember how old you were when
25 you saw the Johnny, the bell hop ad? The video that

1 your attorney showed you earlier for Johnny, the
2 bell hop?

3 A. Late '50s, '60s.

4 Q. That's your recollection?

5 A. (Nods head in the affirmative.)

6 MS. WALD: Can you point? Can you point
7 to an answer?

8 THE WITNESS: Correct.

9 MS. WALD: Thank you, Sandra.

10 BY MS. LUTHER:

11 Q. And thank you for staying on top of
12 that. I'm getting sloppy in my old age.

13 One last question maybe. Do you agree
14 that it would have been easier for you to stop
15 smoking in the 1960s than it was in 2017?

16 MS. WALD: Form.

17 THE WITNESS: All I can say, if tobacco
18 company was honest with the people, I know I would
19 have never smoked.

20 BY MS. LUTHER:

21 Q. And I appreciate that that's your
22 position, but can you answer the question that I
23 asked you.

24 Would it have been easier for you to
25 quit if you had tried in the '60s, than when you

1 finally did quit --

2 A. No.

3 Q. -- in 2017?

4 A. No.

5 Q. And why do you think that's the case?

6 A. I was already addicted.

7 Q. Do you think your addiction remained
8 constant throughout the time that you smoked?

9 MS. WALD: Form.

10 THE WITNESS: All the way till cancer.

11 BY MS. LUTHER:

12 Q. So in your opinion, your addiction to
13 smoking never got worse as the years went on?

14 MS. WALD: Form.

15 THE WITNESS: Yes, from one pack to two
16 is worse.

17 BY MS. LUTHER:

18 Q. So it would have been easier for you to
19 quit when you were only smoking one pack, right?

20 MS. WALD: Form.

21 THE WITNESS: No.

22 BY MS. LUTHER:

23 Q. Okay. You don't agree with that
24 statement?

25 MS. WALD: Form.

1 BY MS. LUTHER:

2 Q. Is that right? You don't agree with
3 that statement that it wouldn't have been easier for
4 you to quit when you were smoking one pack?

5 MS. WALD: Form.

6 THE WITNESS: No.

7 BY MS. LUTHER:

8 Q. Why do you think that is?

9 MS. WALD: Form.

10 THE WITNESS: Because I was already
11 addicted. Wanted more of them.

12 MS. LUTHER: Okay. I have no more
13 questions for you. Thank you, Mrs. Camacho.

14 MS. HENNINGER: I have just a quick one
15 or --

16 MS. WALD: One more attorney. Don't
17 write anything. There's no question. It's okay.

18 EXAMINATION

19 BY MS. HENNINGER:

20 Q. Have you ever heard of someone named
21 Luther Terry? Luther Terry. No?

22 MS. WALD: Can you point?

23 THE WITNESS: No.

24 BY MS. HENNINGER:

25 Q. When you were 17 or 18 in 1964, do you

1 recall the United States Surgeon General coming out
2 with a report that was all over the news linking
3 smoking with -- I didn't finish.

4 Do you recall all over the news in 1964
5 the United States Surgeon General Luther Terry going
6 on television with a report saying smoking causes
7 lung cancer?

8 MS. WALD: Form.

9 THE WITNESS: No.

10 BY MS. HENNINGER:

11 Q. Have you ever heard of the Surgeon
12 General of the United States?

13 A. I do not know. I only know what you
14 people said, remember.

15 Q. You don't remember anything?

16 MS. WALD: Form.

17 Wait for -- is there a question pending?

18 BY MS. HENNINGER:

19 Q. Yeah. You don't remember back into the
20 '60s; is that what you're telling me?

21 MS. WALD: Form.

22 BY MS. HENNINGER:

23 Q. Right?

24 A. Yes.

25 MS. HENNINGER: Okay. Those are all the

1 questions I have.

2 MS. WALD: All right. She is going to
3 read and we are concluding with this deposition.

4 THE VIDEOGRAPHER: That concludes
5 today's deposition of Sandra Camacho, Volume IV.
6 The time is 1:40 p.m. We are off the record.

7 (Plaintiffs' Exhibit 4 marked.)
8
9

10 (The deposition concluded at 1:40 p.m.)

11 -oOo-
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1 CERTIFICATE OF DEPONENT

2 PAGE LINE CHANGE REASON

3 _____

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14 * * * * *

15 I, SANDRA CAMACHO, deponent herein, do hereby
16 certify and declare the within and foregoing
17 transcription to be my deposition in said action;
18 that I have read, corrected and do hereby affix my
19 signature to said deposition under penalty of
20 perjury.

21 _____
22 SANDRA CAMACHO, Deponent

23

24

25

1 CERTIFICATE OF REPORTER

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

4

5 I, Karen L. Jones, a duly commissioned and
6 licensed Court Reporter, Clark County, State of
7 Nevada, do hereby certify: That I reported the
taking of the deposition of the witness, SANDRA
CAMACHO, commencing on Tuesday, December 8, 2021 at
9:04 a.m.

8

9 That prior to being examined, the witness was,
by me, duly sworn to testify to the truth. That I
10 thereafter transcribed my said shorthand notes into
typewriting and that the typewritten transcript of
11 said deposition is a complete, true and accurate
transcription of said shorthand notes.

12

13 I further certify that (1) I am not a relative
or employee of an attorney or counsel of any of the
14 parties, nor a relative or employee of an attorney
or counsel involved in said action, nor a person
15 financially interested in the action; nor do I have
any other relationship with any of the parties or
16 with counsel of any of the parties involved in the
action that may reasonably cause my impartiality to
17 be questioned; and (2) that transcript review
pursuant to NRCPC 30(e) was requested.

18

19

20 IN WITNESS WHEREOF, I have hereunto set my
hand, in my office, in the County of Clark, State of
21 Nevada, this 19th day of December, 2021.

22



23

KAREN L. JONES, CCR NO. 694

24

25

-	1970 252:3	329:8,9,11,13 353:10	8th 249:5
-ooo- 363:11	1978 323:18	30 285:13	9
1	1980 323:21	35 310:25	90s 281:3 320:5 342:21 354:18
1 325:16,23,24 326:2 355:23 356:3	1985 252:6	4	9:04 249:5
10:01 273:23	1990 324:5 333:9,11 352:14	4 330:24 363:7	9:53 273:20
10:52 296:7	1997 315:18	5	A
11:03 296:10	1998 315:22 316:6	50 331:18	A-19-807650-C 249:10
11:33 312:3	1:01 347:22	50/50 274:19	a.m. 249:5
11:35 312:6	1:12 347:25	50s 324:10 326:8 359:3	ability 260:7,10,13
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