

IN THE SUPREME COURT OF THE STATE OF NEVADA

SANDRA CAMACHO; AND ANTHONY  
CAMACHO,

Petitioners,

vs.

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

Respondents,

and

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

Real Parties in Interest.

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*PETITIONERS' APPENDIX  
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*Attorneys for Petitioners, Sandra Camacho and Anthony Camacho*

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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## 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 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

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KAREN L. JONES, CCR NO. 694

24

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