

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

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

Attorneys for Petitioners, Sandra Camacho and Anthony Camacho

1 DISTRICT COURT
2 CLARK COUNTY, NEVADA
3 SANDRA CAMACHO, individually, and)
4 ANTHONY CAMACHO, individually,)
5 vs. Plaintiffs,) Case No.
6 PHILIP MORRIS USA INC., a foreign) A-19-807650-C
7 corporation; R. J. REYNOLDS TOBACCO)
8 COMPANY, a foreign corporation,)
9 individually, and as successor-by-)
10 merger to LORILLARD TOBACCO COMPANY)
11 and as successor-in-interest to the)
12 United States tobacco business of)
13 BROWN & WILLIAMSON TOBACCO)
14 CORPORATION, which is the)
15 successor-by-merger to THE AMERICAN)
16 TOBACCO COMPANY; LIGGETT GROUP,)
LLC, a foreign corporation; ASM)
NATIONWIDE CORPORATION d/b/a)
SILVERADO SMOKES & CIGARS, a)
domestic corporation; and LV SINGHS)
INC. d/b/a SMOKES & VAPORS, a)
domestic corporation; DOES I-X; and)
ROE BUSINESS ENTITIES XI-XX,)
inclusive,)
Defendants.)
_____)

17 VIDEOTAPED DEPOSITION OF SANDRA CAMACHO

18 VOLUME I

19 Taken on Tuesday, November 2, 2021

20 Through a translator

21 By a Certified Stenographer and Legal Videographer

22 At 9:05 a.m.

23 At 531 Morning Mauve Avenue

24 Las Vegas, Nevada

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

1 APPEARANCES:

2 For the Plaintiffs:

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

6
7 For Philip Morris USA Inc.:

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

11
12 For Liggett Group, LLC:

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

15
16 For R. J. Reynolds Tobacco Company:

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

20
21 Also Present:

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

24

25

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3 SANDRA CAMACHO

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9 NUMBER PAGE

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12 Defendant ASM Nationwide
13 Corporation's First
14 Interrogatories to
Plaintiff Sandra Camacho

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

18 Exhibit 4 Plaintiff's Second Amended 27
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Plaintiff Sandra Camacho

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

2

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

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

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

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

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

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

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

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

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

3 (The translator was sworn.)

4 Whereupon,

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

8

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

19

20 EXAMINATION

21 BY MS. KENYON:

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

1 MS. WALD: Maybe slow down a little.

2 BY MS. KENYON:

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

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

16 A. Yes.

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

18 BY MS. KENYON:

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

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

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

3 A. (Indicating.)

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

6 BY MS. KENYON:

7 Q. Are you okay?

8 A. (Inaudible response.)

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

14 A. Yes.

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

21 A. Yes.

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

1 know. Sound good? Does that sound good?

2 A. Yes.

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

5 A. Yes.

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

10 A. Yes.

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

13 A. Yes.

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

17 A. Yes.

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

21 A. Yes.

22 Q. So you ready to go?

23 A. Yes.

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

1 to go. Sound good?

2 A. Yes.

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

6 A. Yes.

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

11 A. Yes.

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

17 A. Yes.

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

20 A. Yes.

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

23 A. Yes.

24 Q. Have you taken any medications today?

25 A. Yes.

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

3 A. No.

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

6 A. No.

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

9 A. No.

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

12 A. Yes.

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

14 A. No.

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

17 A. I do not know.

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

21 A. I do not understand the question.

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

25 A. I do not remember.

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

4 BY MS. KENYON:

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

7 A. Yes.

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

10 A. (Indicating.)

11 Q. Sorry. Is that --

12 A. Yes.

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

15 BY MS. KENYON:

16 Q. You met with Kim?

17 A. Yes.

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

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

21 Q. Did you meet with Kim yesterday?

22 A. Yes.

23 Q. How long did you meet with her?

24 A. I think almost three hours.

25 MS. WALD: Remember to hold it up.

1 THE WITNESS: (Witness complies.)

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

4 BY MS. KENYON:

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

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

9 A. Yes.

10 Q. What did you discuss?

11 A. That it's today.

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

14 A. That it's today.

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

17 MS. WALD: Remember, erase.

18 THE WITNESS: Yes.

19 BY MS. KENYON:

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

22 A. Court date.

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

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

1 erase the top. It's okay.

2 BY MS. KENYON:

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

7 A. I do not remember.

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

10 MS. WALD: Object to form.

11 You can answer. You can answer.

12 BY MS. KENYON:

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

16 MS. WALD: Remember, point.

17 THE WITNESS: Yes.

18 BY MS. KENYON:

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

21 A. What I'm going through.

22 Q. If you could just erase your answer.

23 A. (Witness complies.)

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

1 A. Talking with my lawyer.

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

4 A. (Witness complies.)

5 Q. Are you doing okay?

6 A. Yes.

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

9 MS. WALD: Remember you can point.

10 THE WITNESS: No.

11 BY MS. KENYON:

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

14 A. No.

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

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

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

21 A. Yes.

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

24 A. No.

25 Q. Did something happen between you two?

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

3 Q. Who is "they"?

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

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

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

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

9 A. Here.

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

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

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

17 A. Yes. And on computer.

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

20 A. Yes.

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

23 THE WITNESS: (Inaudible response.)

24 MS. WALD: Are you cold?

25 THE WITNESS: (Inaudible response.)

1 BY MS. KENYON:

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

6 A. Yes.

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

9 A. My family knows.

10 Q. Anyone else besides Laura and your husband?

11 A. (Inaudible response.)

12 MS. WALD: Remember, point.

13 BY MS. KENYON:

14 Q. Anyone else besides Laura or your husband?

15 A. My family knows.

16 Q. Who else in your family knows?

17 A. Two sisters.

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

19 A. (Witness complies.)

20 Q. Is that Linda Blake?

21 A. Yes.

22 Q. And is it Donna Kinsella?

23 A. Yes.

24 Q. When did you talk to Linda?

25 A. Over one week. Mad over politics.

1 Q. Who was mad over politics?

2 A. Linda.

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

5 A. Disagree.

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

8 A. No.

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

11 A. I do not remember.

12 Q. But does she know about this case?

13 A. Yes.

14 Q. What did you tell her?

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

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

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

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

20 A. Yesterday.

21 Q. How did you talk to her?

22 A. Computer.

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

25 ///

1 BY MS. KENYON:

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

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

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

8 A. Yes.

9 Q. What is her last name?

10 A. I do not remember.

11 Q. Do you know where Jan lives?

12 A. No. I do not remember.

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

15 A. Just lawsuit file.

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

18 A. Yes.

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

21 A. I do not remember.

22 Q. Are you doing okay?

23 A. (Inaudible response.)

24 (Exhibit 1 marked.)

25 ///

1 BY MS. KENYON:

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

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

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

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

7 BY MS. KENYON:

8 Q. Can you take a look at that?

9 A. Yes.

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

12 A. Yes.

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

16 MS. WALD: Right here (indicating).

17 THE WITNESS: I don't have them.

18 BY MS. KENYON:

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

21 MS. WALD: Point to the answer.

22 THE WITNESS: Yes.

23 BY MS. KENYON:

24 Q. Did you read these document requests?

25 MS. WALD: Point to the answer.

1 THE WITNESS: Yes.

2 MS. WALD: You can put this down.

3 BY MS. KENYON:

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

5 A. No.

6 Q. Did you look for documents?

7 A. I don't have any.

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

10 A. I do not remember.

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

13 A. (Inaudible response.)

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

16 MS. WALD: And the bags.

17 MS. KENYON: Okay.

18 BY MS. KENYON:

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

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

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

25 Okay? Sound good?

1 A. (Inaudible response.)

2 Q. Yes, you can erase that.

3 (Exhibit 2 marked.)

4 BY MS. KENYON:

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

11 A. Yes.

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

14 A. (Witness complies.)

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

18 A. Yes.

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

22 A. Yes.

23 Q. Is that your signature on that page?

24 A. Yes.

25 Q. How did you prepare your responses to your

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

4 A. Yes.

5 Q. How did you get that information together?

6 A. I know it.

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

10 A. No.

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

15 A. I do not remember.

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

18 A. I do not remember.

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

21 (Exhibit 3 marked.)

22 BY MS. KENYON:

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

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

2 A. (Inaudible response.)

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

5 A. Yes.

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

8 A. (Witness complies.)

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

13 A. Yes.

14 Q. Is that your signature on that page?

15 A. Yes.

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

20 MS. WALD: Object to form.

21 You can answer. Remember, point.

22 THE WITNESS: Please repeat the question.

23 BY MS. KENYON:

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

1 A. Yes.

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

3 1. Can you turn to page 3.

4 A. (Witness complies.)

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

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

7 of birth. That response was your original answer.

8 Do you understand that?

9 A. Yes.

10 Q. Then underneath that it reads "Amended

11 Response." Do you see that?

12 MS. WALD: Point to an answer.

13 THE WITNESS: Yes.

14 BY MS. KENYON:

15 Q. So your amended response provides

16 additional information. Do you see that? Some

17 additional addresses. Do you see that? So

18 underneath the amended response you list a number of

19 addresses now. Do you see that?

20 A. Yes.

21 Q. Where did you get the information in the

22 amended response that you did not have in your

23 initial response?

24 A. I do not remember.

25 Q. Did anyone --

1 A. That's true.

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

4 A. Yes.

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

9 MS. WALD: Form.

10 THE WITNESS: I do not remember.

11 BY MS. KENYON:

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

14 A. Yes.

15 Q. Who?

16 A. (Indicating.)

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

18 A. (Witness complies.)

19 My lawyer.

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

22 A. Yes.

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

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

1 video.

2 MR. JACKSON: No.

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

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

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

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

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

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

15 (Off the stenographic record.)

16 THE VIDEOGRAPHER: Off record at 9:52.

17 (A break was taken.)

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

20 BY MS. KENYON:

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

23 A. Yes.

24 Q. Are you feeling okay?

25 A. Yes.

1 (Exhibit 4 marked.)

2 BY MS. KENYON:

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

7 A. Yes.

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

11 A. I do not understand the question.

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

14 A. Yes.

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

18 A. Yes.

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

23 A. Yes.

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

1 see Interrogatory Number 6? Do you see that?

2 A. Yes.

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

6 A. Yes.

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

9 A. Yes.

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

12 A. Yes.

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

15 A. Yes.

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

20 A. Yes.

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

23 A. Yes.

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

1 interrogatory responses?

2 A. I remember then. Dawned on me.

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

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

7 A. Yes.

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

10 A. Please repeat the question.

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

14 A. My lawyer.

15 Q. Is that Ms. Wald?

16 A. Kim.

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

20 A. Yes.

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

25 A. Yes.

1 Q. Is that your signature?

2 A. Yes.

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

6 A. Yes.

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

8 BY MS. KENYON:

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

14 A. Please repeat the question slow.

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

17 A. Yes.

18 Q. And did you try to find photographs?

19 A. Yes.

20 Q. Did you look for the photographs yourself?

21 A. Yes.

22 Q. Did anyone help you look for photographs?

23 A. Tony.

24 Q. That's your husband, Tony?

25 A. Yes.

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

3 A. To show that I smoked.

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

6 MS. WALD: Form.

7 BY MS. KENYON:

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

10 A. Yes.

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

13 A. Yes.

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

17 A. Please repeat the question.

18 Q. You need me to slow down?

19 A. (Inaudible response.)

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

23 A. Yes.

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

1 record, we have the originals here.

2 (Exhibit 5 marked.)

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

5 BY MS. KENYON:

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

7 A. No.

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

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

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

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

16 BY MS. KENYON:

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

20 A. Yes.

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

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

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

4 A. (Indicating.)

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

7 A. (Inaudible response.)

8 Q. Do you recall her name?

9 A. (Inaudible response.)

10 MS. WALD: Can you point?

11 BY MS. KENYON:

12 Q. Sorry. Can you point?

13 A. No.

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

16 A. Yes.

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

18 A. Yes.

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

21 A. Yes.

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

24 A. Yes.

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

1 these women smoke cigarettes?

2 A. I do not remember.

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

4 A. No.

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

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

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

10 A. No.

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

13 A. Maybe River Grove.

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

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

19 MS. KENYON: Yes.

20 THE WITNESS: Yes.

21 BY MS. KENYON:

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

23 A. No. Girls I worked with.

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

25 A. (Indicating.)

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

3 A. Yes.

4 Q. Where was this photograph taken?

5 A. Denny's.

6 Q. When was the photograph taken?

7 A. I do not remember.

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

10 A. Yes.

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

13 A. Yes. Back room.

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

16 A. Yes.

17 Q. Was that during a break?

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

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

21 A. No.

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

25 A. Yes.

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

4 A. Yes.

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

7 A. Yes.

8 Q. When was this photograph taken?

9 A. I do not remember.

10 Q. Where was this photograph taken?

11 A. Denny's.

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

13 A. Yes.

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

16 A. Yes.

17 Q. Did you want to say something else?

18 A. Denny's.

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

21 A. (Inaudible response.)

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

23 A. My father.

24 Q. When was this photograph taken?

25 A. I do not remember.

1 Q. Where was the photograph taken?

2 A. I do not remember.

3 Q. He's smoking in the picture?

4 A. Yes.

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

6 A. Lucky Strike.

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

9 MS. WALD: Form.

10 BY MS. KENYON:

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

13 A. I do not remember.

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

17 A. Yes.

18 Q. Who is that gentleman on the right?

19 A. Husband.

20 Q. Is that Tony Camacho?

21 A. Yes.

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

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

1 1978. Do you see that?

2 A. Yes.

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

5 THE WITNESS: Dating.

6 BY MS. KENYON:

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

9 A. Yes.

10 Q. Where was this photograph taken?

11 A. I do not remember.

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

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

17 THE WITNESS: L&M.

18 BY MS. KENYON:

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

22 A. Yes.

23 Q. Where did you find those new photographs?

24 A. (Indicating.)

25 MS. WALD: Write it down.

1 THE WITNESS: In cabinet. Lots of albums.

2 BY MS. KENYON:

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

5 A. Yes.

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

7 A. Yes.

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

10 MS. WALD: Object to form.

11 THE WITNESS: Please repeat the question.

12 BY MS. KENYON:

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

16 MS. WALD: Object to form.

17 THE WITNESS: I do not know.

18 BY MS. KENYON:

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

21 A. I do not remember.

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

24 MS. WALD: Object to form.

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

1 know.

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

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

6 (A break was taken.)

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

9 BY MS. KENYON:

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

11 A. Yes.

12 Q. Are you feeling okay?

13 A. Yes.

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

21 A. (Indicating.)

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

24 A. Yes.

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

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

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

14 A. I do not remember.

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

18 A. I do not know.

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

23 A. (Indicating.)

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

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

4 A. After this (indicating)?

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

9 A. Yes.

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

12 A. I do not know.

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

16 A. No.

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

20 A. Yes.

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

22 A. Yes.

23 Q. In Chicago, Illinois?

24 A. Yes.

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

1 A. River Grove.

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

4 A. I do not know.

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

9 A. (Indicating.)

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

14 A. Yes.

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

18 A. I do not understand the question.

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

22 A. Yes.

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

1 and two sisters?

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

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

6 BY MS. KENYON:

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

9 A. Yes.

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

12 A. No.

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

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

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

21 A. Yes.

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

24 A. Yes.

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

1 two sisters live with you at the Belmont address?

2 A. No.

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

6 A. Yes.

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

9 A. Yes.

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

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

13 Q. Dominic, is that your first husband?

14 A. Yes.

15 Q. Did you marry him in 1966?

16 A. Yes.

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

19 MS. WALD: Object to form.

20 BY MS. KENYON:

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

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

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

1 A. I do not remember.

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

4 A. When I got married.

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

6 A. Yes.

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

9 A. Yes.

10 Q. When did you and Dominic get divorced?

11 A. I think 1970 or '71.

12 Q. What led to the divorce?

13 A. His abusive mother.

14 Q. Abusive towards you or Dominic?

15 A. Me. Hit me with shoe.

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

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

18 Q. Is Dominic still living?

19 A. Yes.

20 Q. Do you ever talk to him?

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

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

25 A. I do not know.

1 Q. Was he a smoker?

2 A. No.

3 Q. Did he ever smoke?

4 A. No.

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

6 Were you smoking when you were married to

7 Dominic?

8 A. Yes.

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

11 A. No.

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

14 A. No.

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

17 A. Computer.

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

20 A. Messenger.

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

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

25 Q. I believe you said earlier you have

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

3 A. Yes.

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

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

8 You can answer.

9 THE WITNESS: (Inaudible response.)

10 MS. WALD: You can answer.

11 BY MS. KENYON:

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

14 A. (Inaudible response.)

15 Q. Are you saying everything?

16 A. (Inaudible response.)

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

19 A. Yes.

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

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

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

24 (A break was taken.)

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

1 are back on the record.

2 BY MS. KENYON:

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

4 A. Yes.

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

9 A. Yes.

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

13 A. Yes.

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

16 A. Yes.

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

19 A. She was glad I did.

20 Q. Glad you did what?

21 A. File a lawsuit.

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

23 A. No.

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

25 A. Yes.

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

7 A. Yes.

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

14 A. I do not remember.

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

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

18 THE WITNESS: I do not remember.

19 BY MS. KENYON:

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

22 A. (Inaudible response.)

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

25 A. It's still their home.

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

4 A. Yes.

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

8 A. I do not remember.

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

12 A. Yes.

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

14 A. I do not remember dates.

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

17 A. Yes.

18 Q. So who gave --

19 A. But I lived there.

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

22 A. Yes.

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

25 A. I do not remember.

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

3 A. I do not remember.

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

6 A. Yes.

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

9 A. Yes.

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

12 A. Yes.

13 Q. Who?

14 A. Husband, Tony.

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

17 A. Yes.

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

21 A. Yes.

22 Q. When?

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

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

1 A. After.

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

3 A. Yes.

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

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

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

8 (Off the stenographic record.)

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

11 (A break was taken.)

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

14 BY MS. KENYON:

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

16 A. Yes.

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

22 A. Yes.

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

25 A. I do not remember.

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

5 A. Correct.

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

8 A. Yes.

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

11 A. Yes.

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

14 A. No.

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

17 A. No.

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

21 A. Yes.

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

25 A. Yes.

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

3 A. What year?

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

6 A. I do not remember.

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

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

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

13 BY MS. KENYON:

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

17 A. Yes.

18 Q. Are you okay to keep going?

19 A. Yes.

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

23 A. Yes.

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

1 A. Yes.

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

4 A. Yes.

5 Q. Who?

6 A. Me and Tony.

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

9 A. Yes.

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

12 A. Yes.

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

15 A. No.

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

18 A. Just to say "hi."

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

21 A. Yes.

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

24 A. (Indicating.)

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

1 A. Yes.

2 Q. He died October 25, 1990?

3 A. Yes.

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

5 A. Yes.

6 Q. He smoked Lucky Strikes?

7 A. Yes.

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

10 A. Yes.

11 Q. Did your father ever quit smoking?

12 A. No. When he got cancer.

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

15 A. Yes.

16 Q. Do you know when he got cancer?

17 A. No.

18 Q. What type of cancer?

19 A. Bladder, stroke, heart attack.

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

22 A. Yes.

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

1 A. I do not know.

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

4 A. Yes.

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

7 A. Yes.

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

10 A. Yes.

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

12 A. I do not remember.

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

15 A. Yes.

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

19 A. Yes. And stroke and bladder.

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

23 A. Yes.

24 MS. WALD: Form.

25 ///

1 BY MS. KENYON:

2 Q. Did you discuss that with your father?

3 A. No.

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

6 A. I do not know.

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

9 A. Yes.

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

12 BY MS. KENYON:

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

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

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

19 A. Yes.

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

22 A. No.

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

25 A. No.

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

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

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

8 MS. WALD: Form.

9 THE WITNESS: When I moved to Vegas.

10 BY MS. KENYON:

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

13 MS. WALD: Form. Asked and answered.

14 BY MS. KENYON:

15 Q. Is that correct?

16 A. Sometime in the '90.

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

18 MS. HENNINGER: She's still writing.

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

21 BY MS. KENYON:

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

25 MS. WALD: Form. Asked and answered.

1 BY MS. KENYON:

2 Q. Is that correct?

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

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

7 A. Correct.

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

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

13 BY MS. KENYON:

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

17 MS. WALD: Form.

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

20 THE WITNESS: No.

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

22 (The question was read.)

23 BY MS. KENYON:

24 Q. Is that correct?

25 A. Correct.

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

4 MS. WALD: Object to form.

5 THE WITNESS: I do not know.

6 BY MS. KENYON:

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

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

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

14 A. Yes.

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

17 MS. WALD: Object to form.

18 Mischaracterizes the testimony.

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

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

21 (Off the stenographic record.)

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

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

25 (A break was taken.)

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

3 BY MS. KENYON:

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

5 A. Yes.

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

8 A. I do not remember.

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

11 A. No.

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

14 A. I do not remember.

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

17 A. I do not remember.

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

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

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

25 A. Correct.

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

2 A. I do not remember.

3 Q. Do you -- strike that.

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

6 MS. WALD: Form.

7 BY MS. KENYON:

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

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

12 MS. WALD: Form.

13 THE WITNESS: I do not remember.

14 BY MS. KENYON:

15 Q. Your mother was Virginia Mucci?

16 A. Yes.

17 Q. And she is still living?

18 A. Yes.

19 Q. How is her health?

20 A. Alzheimer.

21 Q. Your mother suffers from Alzheimer's?

22 A. Yes.

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

24 A. I do not remember.

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

1 live in a home?

2 A. No.

3 MS. WALD: Form.

4 BY MS. KENYON:

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

6 A. No.

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

9 A. No.

10 Q. Where does she live?

11 A. In her house.

12 Q. Does someone live with her?

13 A. Yes.

14 Q. Who?

15 A. My sister.

16 Q. Which sister?

17 A. Donna.

18 Q. Was your mother a smoker?

19 A. Yes.

20 Q. What brands did she smoke?

21 A. I think Pall Mall.

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

24 A. Yes.

25 Q. Did she ever quit smoking?

1 A. I do not remember.

2 Q. Is she smoking today?

3 A. No.

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

5 A. Yes.

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

8 A. No.

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

10 A. No.

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

14 A. I do not remember.

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

17 A. Yes.

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

20 A. Yes.

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

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

25 THE WITNESS: I do not know.

1 BY MS. KENYON:

2 Q. Why did your dad quit smoking?

3 MS. WALD: Form.

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

6 BY MS. KENYON:

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

9 A. No.

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

12 A. Not like my dad, no.

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

15 MS. WALD: Form.

16 BY MS. KENYON:

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

19 A. No.

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

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

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

25 A. No.

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

3 A. No.

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

6 MS. WALD: Form.

7 THE WITNESS: No.

8 BY MS. KENYON:

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

11 A. Yes.

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

14 A. No.

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

17 A. Did they know I smoked?

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

20 MS. WALD: Form.

21 THE WITNESS: Please repeat the question.

22 BY MS. KENYON:

23 Q. Did your parents know that you smoked?

24 MS. WALD: Form.

25 THE WITNESS: I do not remember.

1 BY MS. KENYON:

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

5 MS. WALD: Object to form.

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

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

9 MR. CAMACHO: I think so.

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

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

13 (A break was taken.)

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

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

1 CERTIFICATE OF REPORTER

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

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

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

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

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

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

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

Holly Larsen

HOLLY LARSEN, CCR NO. 680

ERRATA SHEET

1

2

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

10

11	Page	Line	Should read:	Reason for change:
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1	ERRATA SHEET (Continued)			
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22	Date: _____			_____
23				Signature of Witness
24				
25				_____
				Name Typed or Printed

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1 DISTRICT COURT
2 CLARK COUNTY, NEVADA
3 SANDRA CAMACHO, individually, and)
4 ANTHONY CAMACHO, individually,)
5 vs. Plaintiffs,) Case No.
6 PHILIP MORRIS USA INC., a foreign) A-19-807650-C
7 corporation; R. J. REYNOLDS TOBACCO)
8 COMPANY, a foreign corporation,)
9 individually, and as successor-by-)
10 merger to LORILLARD TOBACCO COMPANY)
11 and as successor-in-interest to the)
12 United States tobacco business of)
13 BROWN & WILLIAMSON TOBACCO)
14 CORPORATION, which is the)
15 successor-by-merger to THE AMERICAN)
16 TOBACCO COMPANY; LIGGETT GROUP,)
LLC, a foreign corporation; ASM)
NATIONWIDE CORPORATION d/b/a)
SILVERADO SMOKES & CIGARS, a)
domestic corporation; and LV SINGHS)
INC. d/b/a SMOKES & VAPORS, a)
domestic corporation; DOES I-X; and)
ROE BUSINESS ENTITIES XI-XX,)
inclusive,)
Defendants.)
_____)

17 VIDEOTAPED DEPOSITION OF SANDRA CAMACHO

18 VOLUME II

19 Taken on Wednesday, November 3, 2021

20 Through a translator

21 By a Certified Stenographer and Legal Videographer

22 At 9:04 a.m.

23 At 531 Morning Mauve Avenue

24 Las Vegas, Nevada

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

1 APPEARANCES:

2 For the Plaintiffs:

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

6
7 For Philip Morris USA Inc.:

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

11
12 For Liggett Group, LLC:

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

15
16 For R. J. Reynolds Tobacco Company:

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

20
21 Also Present:

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

24

25

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3 SANDRA CAMACHO

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

2

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

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

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

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

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

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

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

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

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

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

5

6 EXAMINATION (Continued)

7 BY MS. KENYON:

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

10 A. Yes.

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

16 A. Yes.

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

18 A. Yes.

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

21 A. Yes.

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

24 A. Okay.

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

1 right?

2 A. Please repeat the question.

3 Q. Donna was born in 1944?

4 A. Yes.

5 Q. So she's your older sister?

6 A. Yes.

7 Q. Has she ever been a smoker?

8 A. Yes.

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

10 A. We smoked.

11 Q. You and your sister smoked together?

12 A. No. We both smoked.

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

15 A. No.

16 Q. Do you know what brand she smoked?

17 A. No.

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

20 A. No.

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

23 A. I do not remember.

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

1 A. No.

2 Q. Did your sister Donna ever quit smoking?

3 A. Yes.

4 Q. When did she quit?

5 A. I do not know.

6 Q. Do you know why she quit smoking?

7 A. No.

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

10 A. No.

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

13 A. I do not know. No.

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

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

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

21 A. Yes.

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

23 A. No.

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

1 A. No.

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

4 A. No.

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

7 A. No.

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

10 A. Yes.

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

12 A. Yes.

13 Q. So she's your younger sister?

14 A. Yes.

15 Q. Has she ever been a smoker?

16 A. No.

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

19 A. No.

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

22 A. No.

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

25 A. No. We never talked about that.

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

4 BY MS. KENYON:

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

7 A. No.

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

10 A. Yes.

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

13 A. Yes.

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

16 A. No.

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

19 A. Yes.

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

21 A. No.

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

24 A. No.

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

1 not to smoke?

2 A. No.

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

5 A. No.

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

7 A. No.

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

10 A. No.

11 Q. Does John have any health issues?

12 A. No.

13 Q. What does he do for a living?

14 A. Work at Supreme for his father.

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

17 A. Yes.

18 Q. Does John have any children?

19 A. Yes.

20 Q. How many?

21 A. One.

22 Q. What is his or her name?

23 A. I do not remember.

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

1 want.

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

3 You're okay?

4 THE WITNESS: (Inaudible response.)

5 MS. WALD: You're okay?

6 THE WITNESS: (Inaudible response.)

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

9 THE WITNESS: Yes.

10 BY MS. KENYON:

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

13 A. Yes.

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

16 A. Yes.

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

18 A. Yes.

19 Q. When did she start smoking?

20 A. I do not remember.

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

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

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

25 A. Nothing.

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

2 A. No.

3 Q. Why not?

4 A. Please repeat the question.

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

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

8 A. No.

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

11 MS. WALD: Object to form.

12 You can answer.

13 THE WITNESS: I do not remember.

14 BY MS. KENYON:

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

17 A. No.

18 Q. Do you know -- strike that.

19 What brand of cigarette did Laura smoke?

20 A. Marlboro Light.

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

23 A. Yes.

24 Q. How often?

25 A. Often.

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

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

5 A. Yes.

6 Q. Has she quit smoking?

7 A. No.

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

10 MS. WALD: Form.

11 THE WITNESS: Maybe once.

12 BY MS. KENYON:

13 Q. Can you tell me what you recall?

14 A. Please repeat the question.

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

18 A. Yes.

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

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

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

1 her question.

2 BY MS. KENYON:

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

6 A. (Inaudible response.)

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

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

13 THE WITNESS: (Inaudible response.)

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

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

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

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

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

22 (A break was taken.)

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

25 ///

1 BY MS. KENYON:

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

4 A. Yes.

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

11 A. Okay.

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

15 A. I do not remember.

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

18 A. I do not remember.

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

21 A. I'm sure they did.

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

24 A. I think my sister told them.

25 Q. How did your parents react when she told

1 them?

2 A. I do not remember.

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

5 A. No.

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

8 A. No.

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

11 A. No.

12 Q. Why not?

13 A. We never talked about it.

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

16 MS. WALD: Form.

17 BY MS. KENYON:

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

20 A. I still smoked when she quit.

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

23 A. I was already addicted.

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

1 doctors that you did not want to quit smoking?

2 A. No.

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

5 MS. WALD: Object to form.

6 THE WITNESS: Never discussed my smoking.

7 BY MS. KENYON:

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

10 A. No.

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

13 MS. WALD: Object to form.

14 THE WITNESS: No.

15 (Exhibit 6 marked.)

16 BY MS. KENYON:

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

20 A. Yes.

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

23 A. Yes.

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

1 A. Yes.

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

4 A. Yes.

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

8 A. Yes.

9 Q. Do you remember Dr. Atkins?

10 A. No.

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

15 A. Yes.

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

18 A. Yes.

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

21 A. I do not remember.

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

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

1 A. I do not remember.

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

4 A. Yes.

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

8 MS. WALD: Object to form.

9 THE WITNESS: Please repeat the question.

10 BY MS. KENYON:

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

16 MS. WALD: Object to form.

17 THE WITNESS: What the 50?

18 BY MS. KENYON:

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

21 A. Yes.

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

24 A. Yes.

25 Q. So that information that your doctor wrote

1 in this medical record is correct?

2 MS. WALD: Form.

3 THE WITNESS: Yes.

4 BY MS. KENYON:

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

8 A. Yes.

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

14 MS. WALD: Form. Asked and answered.

15 THE WITNESS: I do not remember.

16 BY MS. KENYON:

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

22 MS. WALD: Object to form.

23 THE WITNESS: Please repeat the question.

24 BY MS. KENYON:

25 Q. So if there are additional medical records

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

5 MS. WALD: Object to form.

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

9 BY MS. KENYON:

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

12 MS. WALD: Object to form. Argumentative.

13 THE WITNESS: Please repeat the question.

14 BY MS. KENYON:

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

17 MS. WALD: Form.

18 THE WITNESS: (Inaudible response.)

19 BY MS. KENYON:

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

22 MS. WALD: Form.

23 THE WITNESS: Yes.

24 BY MS. KENYON:

25 Q. We talked about the fact that your daughter

1 Laura is still smoking?

2 A. Yes.

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

5 A. Yes.

6 Q. What did you tell her?

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

9 Q. What was her response?

10 A. She cries.

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

13 A. I do not know.

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

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

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

19 A. No.

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

22 A. No.

23 Q. What does she do for a living?

24 A. Works at Supreme Lobster.

25 Q. Does she have any children?

1 A. Yes.

2 Q. How many?

3 A. Two.

4 Q. What are their names?

5 A. Dominic and Gina.

6 Q. How old is Dominic?

7 A. Last year of college, maybe 20.

8 Q. Does he smoke?

9 A. No.

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

12 A. No.

13 Q. How old is her daughter Gina?

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

15 Q. Does she smoke?

16 A. No.

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

18 A. No.

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

22 A. Okay.

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

24 A. I do not remember.

25 Q. Were you in any clubs or organizations in

1 high school?

2 A. I do not remember.

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

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

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

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

9 Q. You live in Las Vegas?

10 A. Yes.

11 Q. Do you gamble?

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

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

14 A. Before, yes.

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

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

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

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

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

23 A. Maybe for malt.

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

25 A. Yes.

1 Q. Where do you go get a malt?

2 A. Dairy Queen.

3 Q. How often do you do that?

4 A. Maybe three times a week.

5 Q. Who takes you to get a malt?

6 A. Husband.

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

8 A. No.

9 Q. Why not?

10 A. Either too hot or windy.

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

13 A. Step out in backyard.

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

16 MS. WALD: Form. Mischaracterizes
17 testimony.

18 You can answer.

19 THE WITNESS: Gets me very tired.

20 Have to -- missiles.

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

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

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

1 (Off the stenographic record.)

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

4 BY MS. KENYON:

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

6 A. Yes.

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

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

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

15 A. Yes.

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

19 A. Yes.

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

22 A. No.

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

25 A. No. Little oxygen.

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

2 A. Yes.

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

5 A. Yes.

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

8 A. Always.

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

11 A. A few times.

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

14 A. Four or five.

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

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

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

25 ///

1 BY MS. KENYON:

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

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

6 MS. WALD: Form.

7 THE WITNESS: Correct.

8 BY MS. KENYON:

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

11 MS. WALD: Can you point --

12 THE WITNESS: Yes.

13 BY MS. KENYON:

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

16 A. No.

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

19 A. When I need it.

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

22 A. Yes.

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

25 A. Yes, and oxygen.

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

3 A. Too many to count.

4 Q. Does that mean five times a day?

5 A. More.

6 Q. Ten times a day?

7 A. More.

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

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

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

13 MS. WALD: Form.

14 THE WITNESS: Yes.

15 BY MS. KENYON:

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

18 MS. WALD: Form.

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

21 BY MS. KENYON:

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

25 A. Yes.

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

4 A. I do not remember.

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

7 A. I do not remember.

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

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

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

14 A. South Point.

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

17 A. Yes.

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

20 A. Almost four years ago.

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

22 A. When we could afford it.

23 Q. How often could you afford it?

24 A. At the time maybe two or three.

25 Q. Two or three times a week?

1 A. Yes. Played pennies.

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

4 A. Yes.

5 Q. Are you doing okay?

6 A. Yes.

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

9 A. No.

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

13 A. No.

14 Q. Did your husband, Anthony, gamble?

15 A. Yes.

16 Q. What did he play?

17 A. We played together penny slot.

18 Q. So he also liked playing penny slots?

19 A. One machine together.

20 Q. Understood. Did you enjoy gambling?

21 A. It was an outing.

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

24 A. Yes.

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

1 that.

2 Did you ever win on the penny slots?

3 A. Yes.

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

5 A. \$100.

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

7 BY MS. KENYON:

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

9 Have you ever lost on penny slots?

10 A. Of course.

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

13 A. Yes.

14 Q. How much was that?

15 A. 30 to \$50.

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

18 A. Had to come home.

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

21 A. Cheaper to play.

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

24 A. If we hit something.

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

1 mean if you won money?

2 A. Yes.

3 Q. Did you smoke inside the casino?

4 A. Yes.

5 Q. Where would you smoke?

6 A. At the machine.

7 Q. Would you drink alcohol when you went to

8 the casino?

9 A. No.

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

11 A. No.

12 Q. Do you do any online gambling now?

13 A. Sometimes.

14 Q. What do you play?

15 A. Slots and sometimes poker.

16 Q. How often do you play online poker?

17 A. Not often.

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

19 than that?

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

21 Q. Do you play online poker for money?

22 A. No.

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

24 understood that gambling with your money was risky.

25 Is that fair?

1 MS. WALD: Object to form.

2 THE WITNESS: Yes.

3 BY MS. KENYON:

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

5 A. Yes.

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

8 A. All we could afford.

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

12 A. Yes.

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

15 A. Sometimes.

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

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

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

22 A. Yes.

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

25 A. Yes.

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

3 A. No.

4 MS. WALD: Form.

5 BY MS. KENYON:

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

8 A. Just me and Tony.

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

11 A. Yes.

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

14 A. No.

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

17 A. No.

18 Q. Earlier you -- are you okay?

19 A. (Indicating.)

20 MS. KENYON: Off the record.

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

23 (A break was taken.)

24 THE VIDEOGRAPHER: The time is 10:46.

25 We're going back on the record.

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

11 BY MS. KENYON:

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

13 A. Yes.

14 Q. Feeling okay to keep going?

15 A. Yes.

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

18 A. Yes.

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

21 A. Yes.

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

23 A. Yes.

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

1 at work?

2 A. No.

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

6 A. Please repeat the question.

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

10 A. Yes. Correct.

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

14 A. Yes.

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

17 A. Yes.

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

20 A. Yes.

21 Q. Where was that?

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

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

25 A. Yes. Yes.

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

2 A. Yes.

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

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

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

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

12 MS. KENYON: Yeah.

13 THE WITNESS: Right. Pinched it.

14 BY MS. KENYON:

15 Q. What does "pinched it" mean?

16 A. Die it out.

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

19 A. Yes.

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

21 A. Yes.

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

23 A. Yes.

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

1 A. No.

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

4 A. Not long.

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

7 A. One hour.

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

10 A. Yes.

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

13 A. Yes.

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

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

17 Q. So eight-hour shifts?

18 A. Yes.

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

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

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

25 A. I do not remember.

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

3 A. No.

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

6 A. Same.

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

9 A. Yes.

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

11 A. I do not remember.

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

14 A. No.

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

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

18 A. No.

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

21 A. Yes.

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

24 MS. WALD: Object to form.

25 Mischaracterizes testimony.

1 You can answer.

2 THE WITNESS: Please repeat the question.

3 BY MS. KENYON:

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

7 MS. WALD: Same objection.

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

10 BY MS. KENYON:

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

13 A. Yes.

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

16 A. Yes.

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

20 A. Yes.

21 Q. Did you ever obtain a cosmetology license?

22 A. Yes.

23 Q. Do you recall when?

24 A. Right after high school.

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

1 graduated from high school in 1964?

2 A. Yes.

3 Q. Did you ever work as a cosmetologist?

4 A. Yes.

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

7 A. Yes -- no.

8 Q. So was it only hair?

9 A. Yes.

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

11 MS. WALD: Form.

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

14 MS. KENYON: Perms.

15 THE WITNESS: Perms and color.

16 You need a rest?

17 THE TRANSLATOR: No. Thank you.

18 BY MS. KENYON:

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

21 A. Yes.

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

24 A. Yes.

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

1 cutting their hair?

2 A. No.

3 Q. Did you work at a salon?

4 A. Yes.

5 Q. What was the name of the salon?

6 A. I do not remember.

7 Q. How long did you work there?

8 A. I do not remember.

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

12 A. Yes.

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

15 A. Yes.

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

18 A. No.

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

21 A. No.

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

23 A. Yes.

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

25 A. Cashier.

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

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

5 A. Full shift.

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

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

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

10 A. Yes.

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

12 A. Yes.

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

15 A. No.

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

18 A. Whenever I could.

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

21 A. Yes.

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

24 A. Please repeat the question.

25 Q. Would you smoke during your breaks at

1 7-Eleven?

2 A. Yes.

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

5 A. Yes.

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

7 MS. WALD: Form. Mischaracterizes
8 testimony.

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

10 BY MS. KENYON:

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

13 A. No.

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

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

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

20 MS. WALD: Form.

21 THE WITNESS: Two or three on a shift.

22 BY MS. KENYON:

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

1 A. Yes.

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

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

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

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

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

11 A. Yes.

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

14 A. No.

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

18 A. Yes.

19 Q. What brands?

20 A. All.

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

23 A. No.

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

1 A. Yes.

2 Q. How often?

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

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

8 MS. WALD: Form.

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

11 BY MS. KENYON:

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

15 A. Yes.

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

17 A. Bermuda and Silverado Ranch in plaza.

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

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

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

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

25 Q. What brand was that?

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

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

5 A. Yes.

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

7 A. Yes.

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

10 A. I do not remember.

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

13 A. I do not remember.

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

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

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

19 A. I do not remember, correct.

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

25 A. Correct.

1 Q. So you told us you sold cigarettes at
2 7-Eleven. Did you ever tell anyone that you did not
3 want to sell cigarettes?

4 A. No.

5 Q. Did you ever complain to anyone about
6 having to sell cigarettes?

7 A. No.

8 Q. Did you ever tell anyone that you felt
9 responsible for selling cigarettes to smokers?

10 A. No.

11 Q. Do you think you are responsible for any
12 smoking-related injuries that one of your customers
13 got?

14 MS. WALD: Form.

15 THE WITNESS: (Indicating.)

16 BY MS. KENYON:

17 Q. Yes?

18 A. No.

19 Q. Why not?

20 A. Because they said no proof cigarettes were
21 harmful.

22 Q. Who said that?

23 A. (Indicating.) On the news tobacco
24 companies said no proof. They lied. I am the proof
25 it causes cancer.

1 MS. KENYON: Move to strike as
2 nonresponsive.

3 THE WITNESS: Would have never started if
4 you, the tobacco company, told the truth.

5 BY MS. KENYON:

6 Q. Based on the information you provided, you
7 first smoked in 1964 when you were 18 years old; is
8 that right?

9 A. Yes.

10 Q. The first Surgeon General report on smoking
11 and health came out in January of 1964 when you were
12 a senior in high school. Do you recall that?

13 A. No.

14 Q. It was a big deal. It was all over the
15 news.

16 A. I do not remember.

17 Q. Did it come up in any of your classes in
18 high school?

19 A. I do not remember. No.

20 Q. Are you familiar with the warnings on the
21 side of cigarette packs?

22 A. Now I am.

23 Q. Are you aware that in 1966 the first
24 Surgeon General's warning was placed on every pack
25 of cigarettes?

1 A. I do not remember.

2 Q. You turned 20 in 1966; is that right?

3 A. Yes.

4 Q. You would have been smoking for about two
5 years?

6 A. Yes.

7 Q. The 1966 warning said, "Caution: Cigarette
8 smoking may be hazardous to your health."

9 A. I do not remember.

10 Q. Do you recall seeing that warning?

11 A. No. I do not remember.

12 Q. Is there any reason that you could not have
13 read and understood that warning in 1966?

14 A. I do not remember. A lot I don't remember.

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

16 MS. WALD: Stay on the video.

17 MS. HENNINGER: Over objection. I think we
18 have a continuing objection.

19 (Off the stenographic record.)

20 THE VIDEOGRAPHER: The time is 11:33, and
21 we are back on the record.

22 MS. WALD: For the purpose of the record,
23 Sandra was trying to communicate with Ms. Kenyon
24 during the break. If the translator -- can you go
25 ahead and read what was on the board?

1 THE WITNESS: Jen, I did buy Basic at smoke
2 shop because they were cheaper than Marlboro.

3 BY MS. KENYON:

4 Q. I appreciate that. We will get into that.
5 I believe you said that you switched from L&M to
6 Marlboro when you moved to Vegas because they were
7 hard to find and that is the reason you switched to
8 Marlboro?

9 A. Yes.

10 Q. When did you first know that cigarettes
11 could be harmful to your health?

12 A. When I got Stage 4 cancer.

13 Q. You were diagnosed with cancer in 2018; is
14 that right?

15 A. I do not remember. Four years March.

16 Q. So March of 2022 will be four years if I'm
17 understanding you correctly; is that right?

18 A. It will be four years in March.

19 Q. So that would mean that you were diagnosed
20 with cancer in or around March of 2018. Does that
21 sound right?

22 A. I know nothing about being diagnosed or
23 operation. Don't remember a thing.

24 Q. That's okay. You're doing great. I know
25 I'm asking you things that are going back, and

1 you've mentioned a couple times that you don't
2 remember things. And that's okay.

3 A. Not for me.

4 MS. LUTHER: Let's go off the record.

5 BY MS. KENYON:

6 Q. Do you have problems remembering things
7 from your childhood?

8 A. Yes.

9 Q. Do you have problems remembering things in
10 the '60s and '70s?

11 MS. WALD: Object to form.

12 THE WITNESS: I do not remember. Ask me
13 stuff to see.

14 BY MS. KENYON:

15 Q. And that's fair. I'm just asking because
16 you have told me a couple times that you have
17 problems remembering things. So -- you know, that's
18 okay. So I'm just asking for your best
19 recollection, what you can remember. Does that
20 sound good?

21 A. Yes.

22 Q. So I think my question was when did you
23 first know that cigarettes could be harmful to your
24 health? And you said when you were diagnosed with
25 cancer. So you're telling me that the first time

1 you learned that smoking cigarettes could be
2 dangerous to your health was in 2018?

3 MS. WALD: Object to form.

4 MS. KENYON: For the record she had written
5 on her white board "No on news."

6 MS. WALD: But then she erased it.

7 It seems like you're a little confused. Do
8 you want her to restate the question?

9 THE WITNESS: Please repeat the question.

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

11 (The question was read.)

12 THE WITNESS: Yes.

13 BY MS. KENYON:

14 Q. What did you learn? How did you learn that
15 smoking cigarettes could be dangerous to your health
16 in 2018?

17 A. Because you said in late '80s, early '90s
18 no proof cigarettes were harmful.

19 Q. Do you recall seeing any news stories in
20 1999 or 2000 following attorney general lawsuits
21 with the tobacco companies where the tobacco
22 companies publicly admitted that smoking caused
23 disease?

24 MS. WALD: Object to form.

25 ///

1 BY MS. KENYON:

2 Q. I'll ask the question again. Do you recall
3 news stories in 1999 or 2000 where the tobacco
4 companies publicly admitted that smoking caused
5 disease?

6 A. I do not remember.

7 Q. Do you recall the tobacco companies putting
8 on their websites in 1999 or 2000 --

9 A. I do not remember.

10 Q. -- that admitted smoking caused disease?

11 A. I do not remember.

12 Q. It was a pretty big story on the news.

13 MS. WALD: Object to form.

14 THE WITNESS: I don't remember.

15 MS. WALD: It's okay. It's okay. It's
16 okay. Sandra, it's okay.

17 MS. HENNINGER: We should take a break.
18 Off the record.

19 MS. WALD: She's still writing.

20 THE WITNESS: Wish I did.

21 MS. WALD: It's okay, Sandra. There's no
22 question. There's no question. Just wait for a
23 question and then answer it. Okay? We can -- let's
24 just take a breath. We're good? Okay. Remember,
25 wait for a question, and then you can answer.

1 You're doing great.

2 BY MS. KENYON:

3 Q. So we talked about the warning label that
4 went on every single pack of cigarettes in 1966. So
5 from 1966 until you quit smoking, every single pack
6 of cigarettes you bought had a warning label on it.
7 Do you recall that?

8 MS. WALD: Remember you have these answers.

9 THE WITNESS: I do not remember.

10 BY MS. KENYON:

11 Q. Do you recall in 1970 the warning label
12 changed? It changed to -- the warning label in 1970
13 read "Warning: The Surgeon General has determined
14 that cigarette smoking is dangerous to your health."

15 A. I do not remember.

16 Q. So the warning label went from "Smoking may
17 be hazardous" in 1966 to "The Surgeon General has
18 determined that cigarette smoking is dangerous to
19 your health." And from 1970 until 1985, every
20 single pack of cigarettes said, "Surgeon General has
21 determined that cigarette smoking is dangerous to
22 your health."

23 A. I do not remember.

24 Q. Is there any reason, if you saw that
25 warning label, that you could not have read and

1 understood that label?

2 A. Please repeat the question.

3 MS. KENYON: Would you mind reading it
4 back?

5 MS. WALD: For the record, she's reading it
6 on the live transcript.

7 THE WITNESS: If I saw it, I would
8 understand it. But I don't remember.

9 BY MS. KENYON:

10 Q. Do you recall ever seeing a warning on your
11 pack of cigarettes?

12 A. No.

13 MS. WALD: Form. It's okay.

14 BY MS. KENYON:

15 Q. Did you know they were there?

16 A. I do not remember.

17 Q. Have you had memory issues in your life?

18 A. Never.

19 Q. I'm a little confused because I thought you
20 told us that you are having some trouble remembering
21 things and there's a lot that you don't remember.

22 A. (Inaudible response.)

23 MS. LUTHER: We're not getting answers
24 here.

25 ///

1 BY MS. KENYON:

2 Q. Are you agreeing there's a lot you don't
3 remember?

4 MS. WALD: Object to form.

5 THE WITNESS: Yes. Correct.

6 BY MS. KENYON:

7 Q. So have you had memory issues in your life?

8 MS. WALD: Object to form. Asked and
9 answered.

10 THE WITNESS: Not before operation, chemo,
11 and radiation. Nine weeks.

12 BY MS. KENYON:

13 Q. So are you telling me that you are blaming
14 memory issues -- strike that.

15 Are you telling me that you had no memory
16 issues before your operation, chemo, and radiation?

17 A. (Inaudible response.)

18 Q. Are you telling me that you had no memory
19 issues before your operation?

20 A. I remember everything before operation. I
21 remember everything before I had operation.

22 Q. So our records show -- strike that.

23 You understand we have collected your
24 medical records in this case; right?

25 A. Yes.

1 Q. Your medical records show that you had your
2 operation in 2018. Does that sound right?

3 A. Correct. Okay.

4 Q. So you're telling me you remember
5 everything before 2018?

6 MS. WALD: Object to form.

7 THE WITNESS: Not now I don't.

8 BY MS. KENYON:

9 Q. I just want to be clear. 2018 was the
10 first time you learned that smoking could be harmful
11 to a smoker's health; is that right?

12 MS. WALD: Object to form. Asked and
13 answered for the third time. I'm going to let
14 Ms. Camacho answer, but if you're going to continue
15 to ask the same questions over and over, we're not
16 going to have that in this deposition. This is
17 going to be the last time you ask that question.

18 MS. KENYON: With all due respect, can you
19 limit them to nonspeaking objections? This is a
20 little bit different question. The record will
21 accurately reflect that.

22 BY MS. KENYON:

23 Q. Mrs. Camacho, I will repeat my new question
24 for you. Just to be clear, 2018 was the first time
25 you learned that smoking could be harmful to a

1 smoker's health; right?

2 MS. WALD: Same objection.

3 THE WITNESS: Only when they said I have
4 cancer.

5 BY MS. KENYON:

6 Q. Right. So I just want to make sure I
7 understand. That's the first time you learned that
8 smoking could be harmful to a smoker's health;
9 right?

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

12 THE WITNESS: Yes.

13 BY MS. KENYON:

14 Q. You told us that you don't recall your
15 doctors ever talking to you about quitting smoking,
16 and we walked through the record from Dr. Atkinson
17 from 2015 where she told you to quit.

18 A. I do not remember.

19 Q. As I mentioned, we've been collecting your
20 records. So I'm just going to show you a few.
21 There are more, but I'm just going to go through a
22 few records with you.

23 (Exhibit 7 marked.)

24 BY MS. KENYON:

25 Q. I'm handing you what I've marked as Defense