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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
WEST PALM BEACH DIVISION

CASE NO. 20-md-02924-ROSENBERG

IN RE: ZANTAC (RANITIDINE) .
PRODUCTS LIABILITY . West Palm Beach, FL
LITIGATION. . July 7, 2022

DISCOVERY HEARING (through Zoom)
BEFORE THE HONORABLE BRUCE REINHART
UNITED STATES MAGISTRATE JUDGE

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1 *THE COURT:* I am having trouble with my camera here.
2 I am trying to get it set up.

3 Good afternoon, everybody. I apologize for starting a
4 little late, my camera is not working right so you get to see
5 all of the mess in my office.

6 Good afternoon, everybody. This is case 20-2924, In
7 Re: Ranitidine (Zantac) Product Liability Litigation. Let me
8 begin with appearances. I'll start with counsel for the
9 Plaintiffs.

10 *MS. FINKEN:* Tracy Finken on behalf of Plaintiffs,
11 good afternoon, your Honor.

12 *THE COURT:* Good afternoon.

13 On behalf of the Defense.

14 *MS. HILL:* Good afternoon, your Honor, Jennifer Hill
15 on behalf of GlaxoSmithKline, and I will be arguing on behalf
16 of the brand Defendants today.

17 *THE COURT:* Good afternoon, Ms. Hill. I think this is
18 the first time you have argued in this case, so welcome. Are
19 you one of our LDC people?

20 *MS. HILL:* I am not.

21 *THE COURT:* Okay. We are here today because the brand
22 Defendants filed at Docket Entry 5718 an expedited motion to
23 compel disclosures relating to Dr. -- I will pronounce her name
24 wrong. Is it Hidajat?

25 *MS. FINKEN:* Hidajat.

1 *THE COURT:* Okay. I have reviewed the motion and the
2 attachments to the motion. I saw the Plaintiffs' response and
3 I reviewed their response, including the entirety of Dr.
4 Hidajat's deposition transcript, and I received the Defendants'
5 reply this morning, which I have also had a chance to review,
6 along with its attachments.

7 Have the Plaintiffs filed anything else that I haven't
8 mentioned?

9 *MS. FINKEN:* No, your Honor.

10 *THE COURT:* Did Defense?

11 *MS. HILL:* No, your Honor.

12 *THE COURT:* Ms. Hill, it is your motion, I will allow
13 you to be heard first and give you the last word when we are
14 all done.

15 *MS. HILL:* Thank you. Thank you for hearing the
16 motion today, we appreciate the Court's time. It is an
17 important issue.

18 The brand Defendants' motion boils down to whether the
19 Plaintiffs should be permitted to put special limitations on
20 the discovery of the opinions of Dr. Hidajat. We are asking
21 the Court to order complete disclosures from Dr. Hidajat, just
22 as would be provided as a matter of course for any other
23 testifying expert.

24 Dr. Hidajat is, of course, the author of a 2019 study
25 on rubber factory workers who were exposed to NDMA in the

1 workplace, and we have since learned that Plaintiffs retained
2 Dr. Hidajat first as a consulting expert back in November 2020.

3 Now, as the Court I'm sure is aware, this study has
4 come up several times in the litigation. It has come up at
5 Science Day in December, it has come in Plaintiffs' primary
6 expert reports that were served in January, and also in the
7 Defendants' expert reports that were served in March.

8 The Plaintiffs then chose to disclose Dr. Hidajat as a
9 testifying expert on March 28th. At that time she was
10 characterized as a rebuttal expert who would be talking about
11 her rubber worker study. The brand Defendants moved to strike
12 her report as untimely and improper, and I understand that the
13 Court has deferred ruling on that motion, but the Court did
14 instruct the Defendants to take her deposition, which we did on
15 June 8th.

16 At that deposition, however, we were repeatedly met
17 with objections and instructions not to answer questions that
18 we feel were basic questions about the information and the
19 materials that Dr. Hidajat reviewed.

20 Your Honor, the Plaintiffs have taken the position
21 that Dr. Hidajat can limit her disclosures and her testimony
22 because she was initially retained as a consulting expert
23 rather than a testifying expert, but in the very same
24 litigation.

25 The Plaintiffs do acknowledge that Dr. Hidajat was

1 consulting on matters concerning Ranitidine. Those are their
2 words from their opposition.

3 Your Honor, the Defendants' position is that these
4 limitations are inappropriate. The lines that the Plaintiffs
5 are trying to draw around Dr. Hidajat's work before March of
6 2022 and her work since March of 2022, are just unrealistic,
7 and in fact contrary to how Dr. Hidajat used her own opinions.

8 Now, there are three points that I do want to
9 emphasize today. First is the extent of Dr. Hidajat's
10 consulting role. It was significant. Dr. Hidajat worked on
11 this litigation for more than a year before she was identified
12 as a testifying expert. We were provided with invoices for 19
13 days of work that she did in March 2022.

14 At her deposition, she estimated that she had billed
15 the Plaintiffs more than \$150,000 for her work before that.
16 That amount represents more than 300 hours of work at her
17 standard billing rate. We know that she worked on matters
18 concerning Ranitidine, but we really have no other discovery on
19 what that work entails.

20 Now, just for context, your Honor, the total amount
21 that Dr. Hidajat has invoiced in this litigation is actually
22 comparable to what Plaintiffs other experts have invoiced,
23 experts like Dr. McTiernan, Dr. Moorman and Dr. Salmon, who all
24 generated reports that were hundreds of pages long.

25 The Defendants are entitled to know what Dr. Hidajat

1 considered and what she reviewed and did for more than 300
2 hours of work, and what she was compensated for. That is basic
3 discovery that we are entitled to under the Federal rules.

4 The second point, Judge, is that full disclosure and
5 full discovery of a testifying expert is appropriate here
6 because there is no clear distinction between Dr. Hidajat's two
7 roles. Your Honor, when Plaintiffs chose to name Dr. Hidajat
8 as a testifying expert, she became an expert who is "retained
9 or specially employed" to provide expert testimony in this
10 case.

11 Those are the rules from -- those are the words from
12 Rule 26(a)(2)(B), and that governs the disclosures that are
13 required from testifying experts, which Dr. Hidajat has become
14 by way of her designation. The Defendants are entitled to a
15 full disclosure of the facts and data that she considered in
16 forming her opinions.

17 Now, your Honor, a majority of Courts do view this as
18 applying with equal force to experts who start off as
19 consulting experts, but then later become testifying experts,
20 and that point is addressed in the Tampa Bay Water case from
21 the Middle District of Florida which is cited in our papers.

22 There are, however, Courts that have allowed an
23 exception to the general rule of full disclosure, but those
24 Courts have done so only in limited circumstances, that is,
25 where there is a clear distinction in the two roles, in the

1 consulting role and the testifying role.

2 Your Honor, if you look at the cases that are cited
3 and discussed in our motion papers, you will see how this
4 distinction is applied. So, in the Tampa Bay Water case, for
5 example, the Court allowed the Plaintiffs to assert work
6 product protection over information that was considered and
7 generated by the consulting company when that information was
8 not even related to the opinions the consultants were later
9 retained to offer through testimony.

10 Here there is no such distinction, there is no
11 distinction between Dr. Hidajat's two roles, and certainly
12 there is not a clear distinction, which is what the law would
13 require.

14 Your Honor, Dr. Hidajat herself says that her opinions
15 are based on the totality of the evidence. She says that in
16 her report, that is on page 28 of her report, and she
17 reiterated that point at her deposition. She is invoking the
18 totality of the evidence. She is not invoking a distinct
19 subset of the evidence, she is not drawing any distinctions or
20 even a clear distinction in the information that she is relying
21 on.

22 Dr. Hidajat also said in no uncertain terms that she
23 views her study as being relevant to the issues in this case,
24 and those issues are whether NDMA exposure in Ranitidine can
25 cause cancer. Of course, Dr. Hidajat's rubber worker study

1 doesn't mention Ranitidine. She has no professional experience
2 with Ranitidine, so she is necessarily relying on information
3 she must have considered in her consulting role to form an
4 opinion on the relevance of her rubber worker study to this
5 litigation.

6 Now, there are a number of questions we would like to
7 ask Dr. Hidajat about how she reached that conclusion, but we
8 weren't permitted to do so in her deposition.

9 Now, Plaintiffs' counsel have offered to stipulate
10 that Dr. Hidajat will not provide the opinion that NDMA can
11 cause cancer. Your Honor, that really does nothing to
12 alleviate the concern; if anything, it confuses the issue and
13 adds more ambiguity to Dr. Hidajat's opinions.

14 Even if Dr. Hidajat does not explicitly say an opinion
15 that NDMA can cause cancer, Plaintiffs' counsel has said that
16 this is the obvious conclusion to be drawn from her study. In
17 other words, even if you eliminate those specific words, there
18 is no practical way to separate out the general causation
19 conclusion from her study. They are inextricably connected.

20 Your Honor, the third point I want to make is that the
21 rules favor broad disclosure from dual role experts. So, even
22 if there were some ambiguity and whether it is appropriate to
23 draw a line between Dr. Hidajat's consulting role and her
24 testifying role, and ambiguity has to be resolved in favor of
25 full disclosure, and that point is also made in the Tampa Bay

1 Water case, along with other cases that are cited in our
2 papers.

3 Your Honor, when an expert reviews materials before or
4 in connection with formulating his or her opinions, those
5 materials should be disclosed. That is the rule that other
6 testifying experts have followed in this litigation, and that
7 is exactly what we are asking of Dr. Hidajat.

8 Your Honor, at the end of the day, this issue is
9 fairly straightforward. The litigation is about whether NDMA
10 in Ranitidine can cause the types of cancers being alleged by
11 the Plaintiffs. The Defendants' expert reports address that
12 point. Dr. Hidajat is being offered as a testifying expert to
13 rebut those opinions.

14 Now, while she may intend to address a smaller slice
15 of that issue, it is the same issue, it is not a different
16 issue and it is not a distinct issue. There is no basis to
17 draw artificial lines around Dr. Hidajat's two roles here.

18 Your Honor, our motion is seeking complete disclosure
19 of the information that all testifying experts should provide
20 under Rule 26 as a matter of course, without any artificial
21 limitations based on Dr. Hidajat's earlier role, and we are
22 also asking for an additional three hours to complete her
23 deposition as to information that was initially withheld.

24 Your Honor, I am happy to answer any questions. Thank
25 you.

1 *THE COURT:* Thank you very much, Ms. Hill.

2 I don't have any questions at this point. I will give
3 you the last word after we hear from Ms. Finken. I know there
4 is one question I am going to put to you, so I will give you
5 time to think about it before you speak again.

6 That is, if I ultimately agree with Ms. Finken, and I
7 clearly haven't made up my mind yet, but if I ultimately agree
8 with Ms. Finken, does that moot out your request to compel
9 further discovery in response to your request for production?

10 You don't need to answer that now if you don't want
11 to. You can respond to that after I hear from Ms. Finken.

12 Ms. Finken, let me hear from you.

13 *MS. FINKEN:* Good afternoon, Judge Reinhart. I
14 disagree with Ms. Hill on one point. There is no ambiguity
15 here. Dr. Hidajat, her opinion is solely, one hundred percent
16 related to the information and materials and her own knowledge
17 about her own studies, and that is it. It does not expand
18 beyond the four corners of her own studies that she conducted
19 in relation to NDMA exposure in rubber workers. She did not
20 need to review any Ranitidine studies or any other NDMA studies
21 to offer opinions about her own studies.

22 She is here in a limited role as a rebuttal witness to
23 address assumptions that were made by the Defense experts
24 related to her own rubber worker study, and for that, the only
25 material she needed to review, and she testified she reviewed,

1 was related to her own studies, her own materials and data
2 related to those studies.

3 Repeatedly during the course of her deposition we
4 advised counsel that Dr. Hidajat would not be offering any
5 testimony at trial relating to general causation on whether or
6 not NDMA causes cancers or Ranitidine causes certain cancers.
7 She was there as a rebuttal witness to testify about the
8 assumptions that were made of her own study. That was noted
9 repeatedly during the course of the deposition and we provided
10 your Honor with the entirety of the transcript instead of
11 excerpts so that you could see it for yourself in context.

12 Repeatedly during the course of the deposition Defense
13 counsel continued to ask Dr. Hidajat about material and
14 information and work that she did as a consulting expert for us
15 prior to her rebuttal report, and we allowed Dr. Hidajat to
16 answer any questions -- to the extent that she relied or
17 considered material in relation to her rebuttal report, we
18 would permit her to answer those questions, however, to the
19 extent that she did not, and the material and work was only
20 done in relation to the consulting work that she did for us on
21 other matters related to this litigation, we instructed her not
22 to answer.

23 There is a very clear delineation between Dr.
24 Hidajat's role as a rebuttal expert and what she did as a
25 consulting expert in this case, and it ends at the boundaries

1 of her own studies with the rubber workers. We repeatedly
2 stated that, as did Dr. Hidajat, and you can tell that from the
3 four corners of her report.

4 While there is a paragraph at the end of her report
5 that indicates that NDMA does cause cancer, and that is based
6 on the totality of the evidence, we have notified counsel and
7 we stated that on the record in the deposition that Dr. Hidajat
8 would not be providing testimony on that particular paragraph
9 in her report at the trial, that we were taking that down.

10 *THE COURT:* I'm sorry to interrupt you. Would you
11 agree -- is your proposal that you would agree to strike, at a
12 minimum, the last sentence of the report which says, "taken
13 together, based on the totality of the evidence, it is my
14 professional opinion, within a reasonable degree of scientific
15 certainty, that NDMA can cause cancer," end of quote?

16 *MS. FINKEN:* Yes, your Honor, and that is something
17 that we stipulated to on the record. Our intent is not to
18 offer Dr. Hidajat as a general causation expert. She is here
19 to testify about her study, and to the extent that that
20 sentence causes confusion, we are willing to strike that
21 sentence from her report.

22 Her sole role as a testifying expert in this case is
23 to rebut assumptions that were made about her own study and her
24 own study data, and the methodology that was used in that
25 study. There was no need for her to review any other materials

1 or consider any other information beyond what she and her
2 colleagues had done in the context of that collection of --
3 constellation of studies in rubber workers for purposes of her
4 rebuttal report.

5 To answer your question, yes, your Honor.

6 *THE COURT:* Thank you. I didn't mean to interrupt
7 you.

8 *MS. FINKEN:* That is fine.

9 *THE COURT:* Go on if you have any further argument you
10 want to present.

11 *MS. FINKEN:* Your Honor, I think I can rest for now.

12 I do want to say that the law is pretty
13 straightforward, the Federal rules and the case on this point.
14 When there is a clear delineation between the role as a
15 consultant and what they are going to testify to at trial, that
16 the consulting capacity and those materials are considered work
17 product and are privileged, and that is our position in this
18 case.

19 I am happy to answer any other questions, your Honor,
20 if you have them.

21 *THE COURT:* This is more of a factual question, which
22 I usually try not to ask.

23 I don't have copies of the reports that critique Dr.
24 Hidajat's report, but were those in the Defense's expert
25 disclosures, their experts essentially say her report is

1 unreliable and shouldn't be relied upon because it deals with
2 environmental, it deals with rubber, it doesn't deal with
3 Ranitidine, and also there are flaws in the actual methodology,
4 they didn't consider this, they didn't consider that, they
5 didn't consider this other thing.

6 *MS. FINKEN:* Correct, your Honor. In the Defense
7 expert reports, and the specific experts that she is rebutting,
8 it is listed in her rebuttal expert report, but they critiqued
9 her study as being unreliable as evidence of causation in this
10 case, and they made assumptions about how the data was
11 collected and how the study was conducted related specifically
12 to the Hidajat studies that were performed.

13 That is why Dr. Hidajat was offered as a rebuttal
14 expert to rebut those assumptions that were made about her
15 studies that were conducted, and she did not need to rely or
16 consider any other information to reach those conclusions and
17 opinions, nor did she.

18 Her opinions were based upon the studies that were
19 conducted by her and her colleagues, many of which predated any
20 of the Ranitidine epidemiological studies that Defense counsel
21 attempted to question Dr. Hidajat about at her deposition, and
22 it was well beyond the scope of her rebuttal expert testimony
23 and report.

24 *THE COURT:* Thank you. Let me go back a little
25 further in the process.

1 Do I assume, then, that some of the Plaintiffs'
2 experts who have been disclosed who will be testifying about
3 general causation, that some of your experts, for their own
4 reasons, do rely on Dr. Hidajat's report, consider it relevant
5 and incorporate it into their methodology for concluding
6 whatever they conclude about general causation, and that is why
7 the Defense was attacking Dr. Hidajat, because she is not going
8 to testify to general causation, but one of your other
9 experts will testify to it, and therefore they want to say that
10 person is flawed by relying on Dr. Hidajat's report because Dr.
11 Hidajat's report employed a flawed methodology?

12 Am I understanding the dialogue here?

13 *MS. FINKEN:* That is correct, your Honor. Dr.
14 Hidajat's studies were one piece of evidence that the
15 Plaintiffs' epidemiologic experts relied upon in reaching
16 conclusions on general causation, along with a whole body of
17 other evidence and the medical and scientific literature about
18 NDMA's ability to cause cancer, and the NDMA in Ranitidine's
19 ability to cause cancer. Dr. Hidajat's publications were one
20 piece of evidence in them reaching their conclusions.

21 The Defense experts critiqued our experts for relying
22 on the Hidajat study at all and they had assumptions about the
23 methodology and how the Hidajat study was conducted in relation
24 to the study design itself, and that is what Dr. Hidajat's
25 rebuttal expert report was designed to address, and that is

1 what it does address.

2 For that she needed no other information beyond the
3 studies that were published by her and her colleagues on that
4 occupational exposure to NDMA and the conclusions that they
5 reached and the methodology that they utilized.

6 *THE COURT:* Thank you very much. Anything else you
7 wanted to present at this time?

8 *MS. FINKEN:* No, your Honor, thank you.

9 *THE COURT:* Let me turn back to Ms. Hill and allow her
10 to respond.

11 *MS. HILL:* Yes, your Honor, thank you.

12 *THE COURT:* Let me start with where I kind of left off
13 with Ms. Finken. It seemed to me that Dr. Hidajat's testimony
14 that she thought her study was relevant actually was
15 nonresponsive to the question that Mr. Sheehan had put to her,
16 but let's assume that is what she believes.

17 Why is that relevant to this litigation? I can
18 understand why a different expert says, I am going to rely on
19 Dr. Hidajat's report because I think it is a good report, it is
20 relevant to me and relevant to my conclusion. If Dr. Hidajat
21 is not ultimately tendering an opinion that Ranitidine causes
22 cancer, why does it matter whether she thinks other people
23 should rely on her report or not?

24 *MS. HILL:* Your Honor, that is a good question. I
25 think the answer is that, just as Plaintiff's counsel expressed

1 in one of their prior briefings, the obvious conclusion that
2 they are seeking to draw from Dr. Hidajat's study and therefore
3 her report is that NDMA can cause cancer.

4 Whether we strike that particular sentence, and
5 whether we ignore Dr. Hidajat's view of how her study fits into
6 this litigation, there is no way to separate out the issues
7 that Dr. Hidajat seeks to cover in her report and the issues in
8 this litigation. They are connected.

9 There is certainly no distinction between the opinions
10 that she is seeking to offer in the four corners of her report
11 and the issues that are being addressed by other experts.

12 Your Honor, I think your questions on the timing of
13 how Dr. Hidajat's report became relevant or came up in expert
14 discovery is really telling.

15 The Plaintiff's epidemiology experts did cite to Dr.
16 Hidajat's study, the defense experts responded to those
17 opinions. That sequence demonstrates that the study, at least
18 from Plaintiffs' view, is connected to the issues in the
19 litigation. So, even if we want to eliminate one sentence from
20 Dr. Hidajat's report, or ignore what she said in her
21 deposition, the conclusion of the study, the conclusion that
22 the Plaintiffs wish to draw is tied to the issues in this case
23 and they are related to the subject matter of Dr. Hidajat's
24 consulting role.

25 Your Honor, you also asked whether -- if you agreed

1 with Plaintiffs' position, whether that would moot the request
2 and the additional disclosures that the Defendants are seeking.

3 Certainly the dispute here does center around the
4 Plaintiffs' position that Dr. Hidajat is entitled to limited
5 disclosures based on her consulting role. Even if the Court
6 were to accept the Plaintiffs' position that Dr. Hidajat's
7 consulting role was distinguishable and unrelated to her
8 testifying role, there is certainly discovery that would still
9 be owed to us.

10 So, Dr. Hidajat was retained, she is the lead author
11 on this rubber worker study, she has no professional experience
12 with Ranitidine, and she was engaged as a consultant. We have
13 no information about what she considered or what she did during
14 that time, but we would presume that part of the consulting
15 related to her rubber worker study, which ultimately is the
16 subject matter of her report and the opinions that she does
17 very explicitly intend to offer as a testifying expert.

18 So, at the very least, there is information that we
19 would be entitled to as it relates to Dr. Hidajat's rubber
20 worker study that hasn't been disclosed to us.

21 *THE COURT:* Did -- go ahead.

22 *MS. HILL:* Your Honor, at the end of the day, the
23 lines that the Plaintiffs are seeking to draw are unworkable
24 because they are artificial. There is no clear distinction.
25 The case law really bears out the difference in -- the

1 situations in which consulting experts can have limited
2 disclosures, and those situations are unlike what we are
3 presented with here today.

4 I understand the Plaintiffs' position is that Dr.
5 Hidajat is intending to offer an opinion on a smaller or more
6 narrow piece of this issue, but the issue is the same, it is
7 not distinct, and for that reason we are entitled to full
8 disclosure, just as would be expected for any other testifying
9 expert.

10 *THE COURT:* So, in your view, what makes Dr. Hidajat
11 different from any other author who is cited by any expert is
12 that she is being offered as a rebuttal expert, so you should
13 be allowed to probe her underlying study. If she had never
14 been offered as a rebuttal expert, you wouldn't feel that you
15 would be entitled to probe into her study?

16 *MS. HILL:* Yes, your Honor. The reason that we are
17 entitled to this discovery, the disclosures that are allowed
18 under Rule 26, is because Dr. Hidajat has been offered as a
19 testifying expert, and therefore we are entitled to disclosures
20 that are required from any other testifying expert, and Dr.
21 Hidajat should be treated no differently because her two roles
22 are connected and entirely related.

23 *THE COURT:* Thank you. Anything further?

24 *MS. HILL:* That is all for me. Thank you.

25 *THE COURT:* Thank you. Very well briefed and very

1 well argued on both sides. It is an interesting question.

2 Here is where I come out:

3 I agree with Ms. Hill in the sense that Dr. Hidajat
4 shouldn't be treated different from anybody else, any other
5 expert, and the fact that she has some sort of a hybrid role
6 here, the rules account for it, and while there are lines that
7 the Defense takes the position are artificial, there are lines
8 that the rules require be drawn.

9 So, first of all, I start with the accepted premise
10 that Dr. Hidajat is an expert witness only and not a fact
11 witness as a rebuttal expert.

12 Under the rules, experts are treated differently, and
13 the reason they are treated differently is because they get to
14 offer opinions. That is what Rule of Evidence 702 says, and
15 the structure of the Rules of Civil Procedure then all derive
16 from the expert's opinion, not the expert, but the expert's
17 opinion is the measuring stick.

18 Rule 26(a)(2)(B), romanette i, says the expert has to
19 issue a report, a testifying expert must tender a report, and
20 the report must contain, quote, "a complete statement of all
21 opinions the witness will express and the basis and reasons for
22 them," close quote.

23 And then the other subparts of subparagraph capital B
24 all relate to the opinion, the facts and data considered in
25 forming the opinion, experts that will be used to summarize or

1 support the opinion, and then the expert's qualifications and
2 other things. So the opinion is what matters here.

3 So, what is Dr. Hidajat's opinion in this case? It is
4 that her study had integrity, that she did a good study, that
5 is it. It was -- other doctors, other experts have decided
6 they are going to rely on her report. Defense criticizes them
7 for relying on what Defense proposes is a flawed report, and
8 Dr. Hidajat comes forward and says there were no flaws in my
9 report, everything they critiqued my report for we took into
10 account.

11 Ultimately, Judge Rosenberg, the finder of fact, will
12 decide whether Dr. Hidajat's report is worthy of belief or not
13 worthy of belief, but she is not opining that anything causes
14 cancer. Her report concludes that NDMA can cause cancer, and
15 other experts are relying on that report. Presumably the
16 Defendants have and will probe those experts as to why they are
17 relying on what the Defense believes to be a flawed report.
18 That is the proper inquiry.

19 Whether Dr. Hidajat thinks her report is relevant to
20 this lawsuit is not relevant to this lawsuit. Her state of
21 mind is not relevant.

22 Now, I presume that the Defendants have asked all the
23 other experts about their state of mind, because it seems clear
24 to me that their decision to rely on Dr. Hidajat's report as
25 relevant would certainly be fair game and I am sure will be

1 aggressively litigated.

2 Dr. Hidajat's opinion that her report is relevant I
3 just find -- first of all, it was gratuitously offered during
4 the testimony, it's not part of her report, so I don't think
5 that swings open a door that allows extensive other discovery
6 in this case.

7 At the end of the day, where I land is, I agree with
8 the Plaintiffs. I think they have properly analyzed the
9 question. Dr. Hidajat was called for the limited purpose and
10 is being offered for the limited purpose of simply responding
11 to the critiques of her methodology. Having reviewed her
12 deposition, I find that she was not instructed to avoid
13 answering questions that were germane to those topics, and to
14 the extent she was not instructed not to answer questions,
15 those instructions were proper.

16 For all of those reasons, I am going to deny the
17 Defense's request to compel further testimony or disclosures
18 from Dr. Hidajat outside the four corners of the expert report.
19 I am going to strike the last sentence of her report, and
20 without that being in the report, she cannot testify to that.
21 That formalizes within the court docket the stipulation from
22 the Plaintiffs that she will not be allowed to testify.

23 I also presume, but I will make this clear on the
24 record as well, I don't believe it would be proper for her to
25 testify to any opinion as to whether her report is relevant or

1 not. As I said earlier, her state of mind is not relevant, and
2 I will leave that ultimately to Judge Rosenberg, but it would
3 seem to me that should not be offered as well.

4 Without waiving any objection you may have to that
5 ruling, Ms. Hill, what are the additional discovery items in
6 the request for production that you want me to compel? I have
7 it here at Docket Entry 5718-3.

8 *MS. HILL:* Your Honor, to the extent Dr. Hidajat
9 reviewed or considered materials relating to her report, it is
10 our position that we would be entitled to discovery of those
11 materials even within the parameters of the Court's ruling.

12 To the extent that Dr. Hidajat was reviewing or
13 considering information or materials that related to a rubber
14 worker study, or any of the issues that are discussed in her
15 rebuttal report, those are clearly discoverable and we should
16 be provided with that information.

17 *THE COURT:* Ms. Finken.

18 *MS. FINKEN:* Your Honor, any information that Dr.
19 Hidajat relied upon or considered in her report has been
20 provided to the Defendants already, and she was questioned
21 about them. There has been nothing that has been held back
22 that she relied or considered in formulating her opinions for
23 her rebuttal report.

24 *THE COURT:* Okay.

25 *MS. HILL:* Your Honor, just to clarify, we did receive

1 invoices that were all dated from March of 2022, and presumably
2 Dr. Hidajat was doing work that related to her rubber worker
3 study or to the issues that ultimately ended up in her rebuttal
4 report. She did that work between November of 2020 and March
5 of 2022, where our first invoices began.

6 It is our position that we would also be entitled to
7 invoices and other information about the compensation that she
8 received related to that aspect of her rebuttal report.

9 *THE COURT:* When did the Defense serve its expert
10 reports?

11 *MS. HILL:* The Defense reports were served on
12 March 7th.

13 *THE COURT:* If Dr. Hidajat is being called as a
14 rebuttal witness, how is anything she did before March 7th
15 discoverable? Until that moment she was a non-testifying
16 expert, unless she went back after the fact and relied on it,
17 and that wouldn't be reflected in her work that predated
18 March 7th.

19 *MS. HILL:* Dr. Hidajat, her entire role and position
20 in this litigation is as the lead author of the rubber worker
21 study. That study has come up in this litigation multiple
22 times, including at Science Day in December 2021, and in the
23 Plaintiffs' opening expert reports.

24 To the extent that she was doing consulting work that
25 specifically related to the same topics that are covered in the

1 four corners of her report, it is our position that we would be
2 entitled to not only the information she considered, but also
3 the invoicing and compensation she received as part of it.

4 The distinction, your Honor, is not necessarily the
5 time, it is the subject matter and it's the substance of what
6 she was doing, regardless of when she did it.

7 *THE COURT:* I understand your argument. I am going to
8 overrule that request. I think her role in this as an expert
9 is limited to, I read the Defense's reports, they said critical
10 things about my study, they are wrong, here is why they are
11 wrong. She could not have had that thought process prior to
12 receiving the Defense's reports. Well, clearly we can go back
13 to when she did the study in 20, whatever it was, 18, 19, and
14 she was thinking about making sure the study was a good study
15 and that she followed accepted scientific and statistical
16 methods and things like that.

17 That is not what she is testifying to here. She is
18 testifying to the methodology, not to the underlying data. She
19 is testifying to the methodology and what she has testified to
20 is, once I got the Defense's report I didn't have to do a whole
21 lot. I remember this very well, I spoke to some of my
22 colleagues, and this is what I did.

23 I will overrule that request.

24 What other request does the Defense have?

25 *MS. HILL:* Nothing further, your Honor. Thank you.

<p>MS. FINKEN: [13] 2/9 2/24 3/8 10/12 12/15 13/7 13/10 14/5 15/12 16/7 23/17 26/7 26/13</p> <p>MS. HILL: [16] 2/13 2/19 3/10 3/14 16/10 16/23 18/21 19/15 19/23 23/7 23/24 24/10 24/18 25/24 26/3 26/14</p> <p>THE COURT: [28]</p>	<p>10/5 10/17 10/21 11/7 11/13 12/19 12/23 14/10 14/14 14/21 15/2 15/6 15/17 15/22 18/13 21/23 23/21 24/7 25/10 25/14</p> <p>above [1] 26/19</p> <p>accept [1] 18/6</p> <p>accepted [2] 20/9 25/15</p> <p>account [2] 20/6 21/10</p> <p>acknowledge [1] 4/25</p> <p>actual [1] 14/3</p> <p>actually [2] 5/21 16/14</p> <p>additional [3] 9/22 18/2 23/5</p> <p>address [6] 9/11 9/14 10/23 15/25 16/1 26/7</p> <p>addressed [3] 6/20 17/11 26/3</p> <p>adds [1] 8/13</p> <p>advised [1] 11/4</p> <p>after [3] 10/3 10/11 24/16</p> <p>afternoon [7] 2/3 2/6 2/11 2/12 2/14 2/17 10/13</p> <p>again [3] 10/5 26/9 26/10</p> <p>aggressively [1] 22/1</p> <p>agree [6] 10/6 10/7 12/11 12/11 20/3 22/7</p> <p>agreed [1] 17/25</p> <p>ahead [1] 18/21</p> <p>all [15] 2/5 3/14 5/23 9/19 15/22 19/24 20/9 20/15 20/20 20/24 21/22 22/3 22/16 24/1 26/10</p> <p>alleged [1] 9/10</p> <p>alleviate [1] 8/12</p> <p>allow [2] 3/12 16/9</p> <p>allowed [6] 6/22 7/5 11/15 19/13 19/17 22/22</p> <p>allows [1] 22/5</p> <p>along [3] 3/6 9/1 15/16</p> <p>already [1] 23/20</p> <p>also [10] 3/5 4/6 7/22 8/25 9/22 14/3 17/25 22/23 24/6 25/2</p> <p>am [12] 2/1 2/2 2/20 9/24 10/4 13/19 15/12 16/18 21/25 22/16 22/19 25/7</p> <p>ambiguity [4] 8/13 8/22 8/24 10/14</p> <p>amount [2] 5/16 5/20</p> <p>analyze [1] 26/12</p> <p>analyzed [1] 22/8</p> <p>Anapol [1] 1/12</p> <p>answer [10] 4/17 9/24 10/10 11/16 11/18 11/22 13/5 13/19 16/25 22/14</p> <p>answering [1] 22/13</p> <p>any [28]</p> <p>anybody [1] 20/4</p> <p>anything [7] 3/7 8/12 16/6 19/23 21/13 24/14 26/2</p> <p>apologize [1] 2/3</p> <p>appearances [1] 2/8</p> <p>applied [1] 7/4</p> <p>applying [1] 6/18</p> <p>appreciate [1] 3/16</p> <p>appropriate [2] 6/5 8/22</p> <p>Arch [1] 1/17</p>	<p>are [59]</p> <p>argued [3] 2/18 20/1 26/11</p> <p>arguing [1] 2/15</p> <p>argument [2] 13/9 25/7</p> <p>around [3] 5/5 9/17 18/3</p> <p>artificial [4] 9/17 9/20 18/24 20/7</p> <p>as [47]</p> <p>ask [3] 8/7 11/13 13/22</p> <p>asked [2] 17/25 21/22</p> <p>asking [3] 3/20 9/7 9/22</p> <p>aspect [1] 24/8</p> <p>assert [1] 7/5</p> <p>assume [2] 15/1 16/16</p> <p>assumptions [6] 10/23 11/8 12/23 14/10 14/14 15/22</p> <p>attachments [2] 3/2 3/6</p> <p>attacking [1] 15/7</p> <p>attempted [1] 14/21</p> <p>author [4] 3/24 18/10 19/11 24/20</p> <p>avoid [1] 22/12</p> <p>aware [1] 4/3</p>
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