

IN THE CIRCUIT COURT
TWENTIETH JUDICIAL CIRCUIT
ST. CLAIR COUNTY, ILLINOIS

DIANA HOFFMANN,)
individually and as)
Independent Administrator)
of the Estate of THOMAS R.) No. 17-L-517
HOFFMANN, Deceased, et al.,)
)
Plaintiff,)
)
v.)
)
SYNGENTA CROP PROTECTION,)
LLC, et al.,)
)
Defendants.)

- - - -

CONFIDENTIAL PURSUANT TO PROTECTIVE ORDER

VIDEOTAPED ZOOM DEPOSITION OF
SYNGENTA CROP PROTECTION, LLC

PHILIP BOTHAM
(Volume V - pages 1120 - 1420 inclusive)

Friday, June 19, 2020
Berkshire, England,
United Kingdom
(Deponent's location)

Reported by:
LEAH M. WILLERSDORF,
(AVR, MBIVR No. 166,
QRR2, International
Participating Member NCRA.)
Job No. 27626

1 Marks's work, wasn't it, with respect to her
2 studies 2 and 3?

3 MR. NARESH: Objection to form.

4 THE WITNESS: Yes, we agree that
5 the earlier Marks studies were not
6 directly communicated to regulatory
7 agencies.

8 BY MR. TILLERY:

9 Q. And they weren't published either,
10 were they?

11 A. The first study was presented at
12 an external scientific meeting but not
13 published.

14 Q. The second one was not published,
15 right?

16 A. That's correct.

17 Q. The third study was not published?

18 A. That's correct.

19 Q. And those studies were never sent on
20 to relevant regulatory agencies, correct?

21 A. That's right. It was the fourth
22 study that was communicated to the EPA.

23 Q. And only part of the fourth study;
24 would you agree with me? Or should we go back
25 through that? Only a part of it, only one