

RECEIVED

Nov 03 2025

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM RICHLAND COUNTY
Court of Common Pleas
Jean H. Toal, Circuit Court Judge

Appellate Case No. 2025-000065

Michael L. Perry and Lonnie Long,..... Respondents,

v.

American International Industries et al.

Of whom Johnson & Johnson; LLT Management, LLC
f/k/a LTL Management, LLC; Kenvue, Inc.; and Johnson
& Johnson Holdco (NA), Inc. are the Appellants.

PROOF OF SERVICE

I, the undersigned Senior Paralegal, of the law offices of Nelson Mullins Riley & Scarborough LLP, attorneys for Appellants, do hereby certify that I have served all counsel of record in this action with a copy of the document(s) set forth below under Supreme Court Order dated April 24, 2024.

PLEADING(s): Record on Appeal Volumes 1 to XLVIII

Counsel Served:

Via Titan Secure File Transfer Only

Theile B. McVey, Esquire
John D. Kassel, Esquire
Jamie Rae Rutkoski, Esquire
Kassel McVey, Attorneys at Law
1330 Laurel Street
Columbia, SC 29201
tmcvey@kassellaw.com
jkassel@kassellaw.com
jrutkoski@kassellaw.com
EMoultrie@kassellaw.com
lmoultrie@kassellaw.com

Charles William Branham, III, Esquire
Rachel Gross, Esquire
Misty A. Farris, Esquire (admitted Pro Hac Vice)
Ka'Leya Q. Hardin, Esquire (admitted Pro Hac Vice)
Dean Omar Branham Shirley, LLP
1801 North Lamar Street, Suite 300
Dallas, TX 75202
tbranham@dobslegal.com
rgross@dobslegal.com
mfarris@dobslegal.com
khardin@dobslegal.com
lshirley@dobslegal.com
rgarner@dobslegal.com
tgilliland@dobslegal.com

David Humen, Esquire
Dean, Omar & Branham, LLP
4146 Mapleridge Dr
Grapevine, TX 76051
dhumen@dobslegal.com
spepin@dobslegal.com
rmartinez@dobslegal.com

Attorneys for Respondents

/s/Meredith S. Keane

Meredith Keane
Senior Paralegal

November 3, 2025

Eileen Hindman

From: Meredith Keane
Sent: Monday, November 3, 2025 4:31 PM
To: Theile McVey; John Kassel; Jamie Rutkoski; Elizabeth Moultrie; Liberty Moultrie; Trey Branham; Rachel Gross; mfarris@dobslegal.com; khardin@dobslegal.com; lshirley@dobslegal.com; rgarner@dobslegal.com; Teresa Gilliland; dhumen@dobslegal.com; spepin@dobslegal.com; rmartinez@dobslegal.com
Cc: Blake Williams; Eileen Hindman; Mitch Brown; Matt Bogan; Meredith Keane
Subject: Perry v. Defendants Johnson & Johnson Case No. 2025-000065 - 11/3/2025 Service of the Record on Appeal
Attachments: 2025.11.03 Perry - UPDATED Proof of Service VIA TITAN - Record on Appeal (MWS).pdf

Counsel,
The Record on Appeal, Volumes I -XLVIII, in this matter is being served upon you via Titan Secure File Transfer. Also attached is a copy of the Proof of Service that will be filed with the Court of Appeals.
Thank you.



MEREDITH KEANE [SENIOR PARALEGAL](#)
meredith.keane@nelsonmullins.com

MERIDIAN | 17TH FLOOR
1320 MAIN STREET | COLUMBIA, SC 29201
T 803.255.9564 F 803.256.7500
NELSONMULLINS.COM [VCARD](#)

Eileen Hindman

From: Meredith Keane via TitanFile <notifications@us.titanfile.com>
Sent: Monday, November 3, 2025 4:31 PM
To: Eileen Hindman
Subject: Perry v. Defendants Johnson & Johnson - 11/03/2025 Record on Appeal Service



Meredith Keane
shared 1 file with you

Meredith sent you the following file:

- PERRY - ROA BY VOLUME - As Served 11.03.25.zip

with the following message:

Counsel,

Enclosed for service, is the Record on Appeal - Volumes I to XLVIII. Additionally enclosed is a copy of the Proof of Service.

Thank you.

Meredith Keane, Senior Paralegal to Blake Williams

[Access Files](#)

Confidentiality Notice

This message is intended exclusively for the individual or entity to which it is addressed. This communication may contain information that is proprietary, privileged, confidential or otherwise legally exempt from disclosure. If you are not the named addressee, you are not authorized to read, print, retain, copy or disseminate this message or any part of it. If you have received this message in error, please notify the sender immediately either by phone (800-237-2000) or reply to this e-mail and delete all copies of this message.

Expiry date: 2026-02-01

Copy and paste link to go directly to "Perry v. Defendants Johnson & Johnson - 11/03/2025 Record on Appeal Service": <https://nelsonmullins.titanfile.com/channels/sE4ujE/>

This message was sent to eileen.hindman@nelsonmullins.com.

Change your [notification settings](#).

© 2025 TitanFile Inc. 1050 King St W, Toronto, ON M6K 0C7, Canada

Toll Free: +1-855-315-6012

RECORD ON APPEAL INDEX

VOLUME I

Orders:

Order Granting Default Against AII, October 3, 20231

Order Denying AII’s Motion to Lift Default, November 2, 20234

Form 4 Order denying Janssen, Johnson & Johnson Holdco, Inc, and Kenvue’s Motion to Dismiss, July 2, 20249

Form 4 Order granting Motion to Compel, July 2, 202411

Order Granting Joint Motion Requesting the Division of Plaintiff Michael L. Perry’s Tissue, July 10, 202413

Order Regarding AII’s Financial Discovery, August 8, 202417

Order on Plaintiffs’ Motion to Compel and Motion for Sanctions against Defendants Kenvue, Inc and Johnson & Johnson Holdco (NA) Inc., August 9, 202420

Order on AII’s Post-trial Motions, December 11, 202424

Order on Defendants Johnson & Johnson; LLT Management, LLC; Johnson & Johnson Holdco (NA) Inc., and Kenvue, Inc.’s Post Trial Motions, December 11, 2024.....68

Amended Order on Defendants Johnson & Johnson; LLT Management, LLC; Johnson & Johnson Holdco (NA) Inc.; and Kenvue, Inc’s Post Trial Motions, March 2, 2025154

Order on Remand from the South Carolina Court of Appeals regarding Defendants Johnson & Johnson’s Motion to Reconsider or to Alter and Amend this Court’s December 11, 2024 Order, March 2, 2025240

Verdict Form:

Verdict Form, August 19, 2024259

Pleadings:

Plaintiff’s Summons and Complaint, August 4, 2023263

Johnson & Johnson’s Answer to Complaint, September 7, 2023.....414

LTL Management’s Answer to Complaint, September 7, 2023448

VOLUME II

Plaintiff’s First Amended Complaint, November 30, 2023480

Johnson & Johnson’s Answer to Amended Complaint, December 6, 2023617

LTL Management’s Answer to Amended Complaint, December 6, 2023651

Plaintiff’s Second Amended Complaint with Exhibits, February 1, 2024683

Johnson & Johnson’s Answer to Second Amended Complaint, February 16, 2024815

LLT Management, LLC Answer to Second Amended Complaint, February 16, 2024.....850

Johnson & Johnson’s Holdco (NA) Answer to Second Amended Complaint, July 17, 2024.....883

Kenvue Inc’s Answer to 2nd Amended Complaint, July 17, 2024.....917

VOLUME III

Motions, Supporting Memoranda:

PreTrial Motions, Supporting Memorandums:

Kenvue, Janssen, and J&J Holdco’s Motion to Dismiss & Exhibits, February 16, 2024951

 Ex A – 4/23/23 Kenvue S-11127

 Ex B - *Ochoa v 3 M* – Order1120

 Ex C – *Henderson v Taylor-Seidenback* Order.....960

 Ex E – *LaSalle v. Am Int’l* – Order1284

 Ex F – *Yandell v J&J* – Order961

 Ex G – *Egli v J&J* – Order1277

Johnson & Johnson Defendants Motion for Partial Summary Judgment, June 11, 2024.....1292

 Ex A – Michael Perry Vol 1 Deposition Excerpts1302

Plaintiffs’ Response in Opposition to Defendants Johnson & Johnson Holdco (NA) Inc. and Kenvue, Inc.’s Motion to Dismiss (and exhibits attached thereto), June 28, 2024.....1306

 Ex 1 – Special Verdict Form from *Lee v. Johnson & Johnson*1323

 Ex 2 – Verdict Form and Special Interrogatory, *Garcia v. Avon Products, Inc.*,1327

 Ex 3 – Order in *Garcia/Salcedo* in Cook County, Illinois, 2/26/20241333

 Ex 4 – New Jersey (Middlesex Cty.) Hearing Transcript 5/24/20231335

 Ex 5 – New Jersey Order 6/1/20231377

 Ex 6 – Louisiana Hearing Transcript/Order 9/29/20231381

 Ex 7 – Pennsylvania Order 10/20/20231388

 Ex 8 – New Jersey (Atlantic Cty.) Order 9/27/20231390

 Ex 9 – Order Denying J&J Defendants’ Motion to Dismiss, 4/10/24.1409

 Ex 10 - Plaintiffs’ Responses to Defendants’ Standard Interrogatories, 9/13/231415

Ex 11 - List of Providers and Facilities.....	1426
Ex 12 - Kenvue (Mongon) depo. 8/14/2023	1428

VOLUME IV

Ex 13 - Kenvue (Ruh) depo. 8/16/2023	1473
Ex 14 – Transcript of JJCI (Goodridge) 2/14/2022	1511
Ex 15 – JJCI (Goodridge) depo. 12/20/2021	1557
Ex 16 - Donald McGraw Declaration 9/18/2023.....	1604
Ex 17 - Kenvue SEC S-4 8/3/2023	1629
Ex 18 - Kenvue, Inc. SEC Form S-1 1/4/2023	1637
Ex 19 – Old JJCI Annual Report (filed in NC) 4/5/2021	1660
Ex 20 – Johnson & Johnson Form 10k 2018	1662
Ex 21 – (a)-(e), Certificates 10/12/2021	1673
Ex 22 - J&J/LTL (Kuffner) depo. 11/9/2023.....	1707
Ex 23 – New JJCI/Holdco Report (filed in NC) 4/5/2023.....	1729
Ex 24 – Janssen Pharmaceuticals Annual Report (filed in NC) 3/28/2023	1731
Ex 25 – LTL Management LLC Articles of Formation (NC) 10/12/2021	1734
Ex 26 – J&J Project Plato approval memo 10/11/2021	1738
Ex 27 - Draft of J&J’s Product List for the FDA, 12/5/11.....	1750
Ex 28 - Product List, undated (listing all baby powders under the same category: “baby powder”).....	1757

Plaintiffs’ Response in Opposition to Defendants Johnson & Johnson, Inc. and LTL Management, LLC’s Motion for Partial Summary Judgment (and exhibits attached thereto), July 8, 2024 — Pursuant to Plaintiff Counsel agreement only the below exhibits are to be included in the Record on Appeal

Ex 01 – M. Perry Video Deposition, 10/10/2023	1784
Ex 21 - Dana, “A Text-book of Mineralogy”	1801
Ex 128 - Peretti, “Geology and Genesis of the Talc Deposits in the Pinerolese” 1966	1848
Ex 134 - Report of Dr. James Webber, 7/11/2022.....	1858
Ex 257- J&J Resp. to Requests for Admission, 7/26/2021	1868
Ex 258 - Old JJCI Responses to Requests for Admission, 7/26/2021	1889
Ex 259 - J&J Audit Testing of Windsor 66 for Asbestos 6/28/1977; J&J letter to R. Miller 2/23/1978; J&J Raw Material Spec. RM08006 1/7/1992; J&J Raw Material Spec. RM08006, 9/23/1997	1906
Ex 260 - Tran. of J&J (Dr. Hopkins), 7/22/2019	1917
	1938

VOLUME V

Ex 261 - International Agency for Research on Cancer (IARC) Monograph, “Asbestos,” 2012.....	1967
Ex 262- J&J Resp. to Interrog. (<i>Chapman</i>), 5/30/2018	1981
Ex 263 - J&J (Dr. Hopkins) depo., 4/11/2018	1992
Ex 264 - Gillson, “Origin of the Vermont Talc Deposits,” <i>Econ. Geo.</i> , 1927	2080
Ex 265- J&J letter “Talc/Asbestos”, 9/5/1972	2103
Ex 266 - Affidavit of R. Mark Bailey, 10/30/2023	2113

Ex 267 - Report of Dr. Mark Rigler, 11/6/2023	2145
Ex 268 - J&J memo 1/3/1974 (TEM is “the only absolute proof”).....	2197
Ex 269 - J&J internal memo, 5/16/1973	2199
Ex 270 - Decl. of Dr. Hopkins, 7/7/2016.....	2201
Ex 271 - Demonstrative Chart Summarizing Battelle Italian Results; Battelle Reports	2208
Ex 272 - J&J memo “Preliminary Evaluation”, 11/1/1967.....	2229
Ex 273 - J&J internal memo, 4/15/1969.....	2244
Ex 274 - Demonstrative of J&J’s Internal Documents 1957-2004; Transcript showing its admission.....	2247
Ex 275- Decades of Evidence” (1948-2020) Demonstrative Chart, 3/31/2021.....	2258
Ex 276 - Letter from Dr. Blount on her 1991 paper, 2/10/1992	2279
Ex 277 - J&J internal memorandum, 10/16/1997.....	2282
Ex 278 - NIOSH “Summary of Plant Observation Reports and Evaluation”, 3/1979	2288
Ex 279 - Depo. of Steven Mann (J&J), 2/15/2021	2306
Ex 280 - Dr. Reynolds report to J&J, 3/1974 (Dartmouth).	2377
Ex 281 - J&J “Proposed Specs For Analyzing Talc For Asbestos”, 5/22/1973.....	2412
Ex 282 - J&J letter, 2/18/1975	2422
Ex 283 - J&J memo, 11/24/1976	2424
Ex 284 - J&J memo “Talc Program”, 6/7/1971	2426
Ex 285 - J&J memo “Windsor Minerals and Talc”, 4/26/1973	2428
Ex 286 - J&J PowerPoint, 4/28/1997.....	2432
Ex 287 - J&J PowerPoint, 8/18/1997	2436
Ex 288 -, J&J memo on NIOSH study	2439
Ex 289 - J&J memo “Management Authorization for Additional Talc Safety Studies”, 3/3/1975.....	2449
Ex 290 - J&J memo “Talc/Powder Program and Strategy”, 3/17/1975.....	2452
Ex 291 - J&J “Antagonistic Personalities” memo, 11/29/1972.....	2455
Ex 292 - CTFA meeting minutes, 2/4/1975	2459
Ex 293 - J&J letter to FDA 9/6/1974; J&J letter to the CTFA 12/17/1974.....	2464

VOLUME VI

Ex 294 - Dr. Langer to J&J, 11/10/1971	2468
Ex 295 - Dr. Hutchinson report to McCrone/J&J	2473
Ex 296 - J&J letter to the CTFA (to be forwarded to the FDA), 3/15/1976	2517
Ex 297 - Depo. of J&J (Musco), 3/8/2019.....	2520
Ex 298 - J&J advertisement 1965	2533
Ex 299 - J&J guidebook for physicians and nurses, 6/10/1976.....	2535
Ex 300 - J&J purity claim support, 2/10/1974.....	2585
Ex 301- McCrone letter to Zeitz, 11/05/1975	2588

Motions in Limine, Memos, Replies and Trial Submissions:

Plaintiffs’ Motion in Limine No. 17 to Exclude the Testimony of Dr. Gregory Diette (and exhibits attached thereto), July 11, 2024	2593
Ex 01 – Diette Report, 6/27/24	2606

Ex 02 – Diette Supplemental Report, 7/2/24	2705
Ex 03 – Diette Deposition, 2/3/23.....	2744
Ex 04 – McDonald & McDonald, Mesothelioma: <i>Is there A Background?</i>	2779
Ex 05 – McDonald & McDonald, Mesothelioma: <i>The epidemiology of mesothelioma in historical context</i>	2791
Ex 06 – Hillerdal, <i>Mesothelioma: cases associated non-occupational and low does exposure</i>	2803
Ex 07 – Wiggins, <i>BTS Statement on malignant mesothelioma in UK</i>	2813
Ex 08 – Moore, <i>Malignant mesothelioma</i>	2833
Ex 09 – Dail and Hammar’s Pulmonary Pathology.....	2845
Ex 10 – Teta, <i>US mesothelioma patterns</i>	2849
Ex 11 – Tan, <i>Projection of mesothelioma mortality in Britain</i>	2860
Ex 12 – Delgermaa, <i>global mesothelioma deaths reported to World Health</i>	2868
Ex 13 – Report of Dr. David Madigan, 2/1/21	2882
Ex 14 – Moolgavkar, <i>Pleural and peritoneal mesotheliomas in SEER</i>	2907
Ex 15 – Moolgavkar Reporting, <i>Hirshberg</i>	2918
Ex 16 – MUSC Medical Record	2921
Ex 17 – Dr. Diette Depo Transcript, 7/3/24.....	2923
Ex 18 – No exhibit reference	

VOLUME VII

Ex 19 – Playne/Plant MIL Hearing Transcript, 2/14/23	2951
Plaintiffs’ Motion in Limine No. 20 Regarding Admissibility of Documents Without Sponsoring Witness (and exhibits attached thereto), July 10, 2024	3031
Ex 01 – Stipulation regarding J&J Documents Produced.....	3036
Plaintiffs’ Motion in Limine No. 22 Motion for Evidentiary Sanctions Against Johnson & Johnson, LLT Management LLC, Johnson & Johnson Holdco (NA) Inc., and Kenvue, Inc. Based on Spoliation of Evidence (and exhibits thereto), July 10, 2024	3041
Ex 01 – Deposition of M. Perry, Vol 1	3081
Ex 02 – McBrayer Order, 11/5/21	3128
Ex 03 - Battelle Report 2/29/1956	3141
Ex 04 – Report of Dr. Webber, 6/10/21	3186
Ex 05 – Demonstrative summarizing reports of asbestos from 1957 to 2004	3225
Ex 06 – Demonstrative on findings of asbestos minerals 696 samples years 1967 to 1988	3233
Ex 07 – Memo from J&J ‘s Dr. Nash, 7/29/1971	3254
Ex 08 - Memorandum from J&J’s D.R. Petterson 4/26/1973	3257
Ex 09 - Memorandum from Dr. Nashed 10/23/1973	3261
Ex 10 - Ernest F. Fullam Inc. report to (codefendant) Whittaker, Clark & Daniels, Inc.	3264
Ex 11 - Luzenac report on Argonaut 5/23/2002	3270
Ex 12 - Blount, A.M., <i>Amphibole Content of Cosmetic and Pharmaceutical Talcs</i>	3273
Ex 13 - Steffen et. al. Serious ovarian cancer caused by exposure to asbestos.....	3282
Ex 14 - Report of Dr. Rigler 6/11/2021.....	3296
Ex 15 - Excerpt of Mark Bailey’s Report on Vermont talc 11/16/2020.....	3306

Ex 16 - Moline, J., et. al., <i>Mesothelioma associated with the use of cosmetic talc</i>	3328
Ex 17 - Emory, TS. <i>Malignant mesothelioma following repeated exposures to cosmetic talc</i>	3336
Ex 18 – Talc and Asbestos – J&J (Madigan)	3343
Ex 19 - J&J notebook 8/10/1972 (reporting tremolite “fibers	3364

VOLUME VIII

Ex 20 - J&J memo 4/19/1973 (noting tremolite fibers in four JBP samples).....	3367
Ex 21 – J&J responses to Interrogatories, <i>Breakell v. 3M</i>	3369
Ex 22 - CSMRI report 4/14/1971.....	3505
Ex 23 - CSMRI report 7/7/1971.....	3501
Ex 24 - CSMRI report 2/26/1973.....	3515
Ex 25 - J&J memo 7/9/1971 at pg. 4	3522
Ex 26 - Dr. Langer to J&J 11/10/1971	3530
Ex 27 - J&J memo 9/9/1975	3535
Ex 28 - J&J memo 10/3/1975	3539
Ex 29 - Excerpt of report of Dr. Hutchins 1972	3543
Ex 30 - McCrone report 10/27/1972.....	3568
Ex 31 - McCrone report 2/11/1974	3572
Ex 32 - McCrone report 3/11/1974.....	3574
Ex 33 - McCrone report 7/8/1974.....	3578
Ex 34 - McCrone report 7/1/1975.....	3582
Ex 35 - McCrone report 11/5/1975	3588
Ex 36 - Windsor Mineral, 5/24/1976	3591
Ex 37 - Dr. Reynolds report 3/1974 at pg. 6	3593
Ex 38 - EMV Associates report 4/4/1977	3628
Ex 39 - RJ Lee report 3/14/1988.....	3631
Ex 40 - Dr. Blount to J&J attorney 4/23/1998	3635
Ex 41 - Excerpt of the J&J designee Dr. Hopkins 7/22/2019	3637
Ex 42 - J&J’s responses to discovery (excerpt) in Eggers.....	3644
Ex 43 - Expert report of Dr. Sanchez report 7/30/2021	3672
Ex 44 - Excerpts of) Mineralogy and Morphology of Amphiboles	3703
Ex 45 - <i>Misidentification of Asbestos in Talc</i> by J&J’s Mr. Ashton 1977.....	3718
Ex 46 - J&J’s TM7024 8/21/1995.....	3735
Ex 47 - McCrone to J&J (Windsor Mineral) 8/22/1985	3746
Ex 48 - J&J (Windsor Mineral) to McCrone 9/10/1985	3749
Ex 49 - McCrone to J&J (Windsor Mineral) 10/8/1985	3751
Ex 50 - McCrone to J&J 12/17/1990.....	3753
Ex 51 - McCrone to Cyprus Windsor Minerals 11/26/1990	3759
Ex 52 - ASTM D6620-19, Standard Practice for Asbestos Detection Limit Based on Counts (2019).....	3770
Ex 53 - EPA, Region III Fact Sheet, Quality Control Tools: Blanks (2009)	3782
Ex 54 - McCrone Standard Operating Procedure 3/24/1987	3785
Ex 55 - Email from Ruark Lanham, FDA Divisional Recall Coordinator, 10/17/2019	3791
Ex 56 - Decl. of Dr. Sanchez 3/29/2021	3793

Ex 57 - Letter from RJ Lee 10/28/2019	3797
Ex 58 - Excerpt of Dr. Van Orden 3/12/2020.....	3802
Ex 60 - McCrone to J&J 1/28/1987	3805
Ex 61 - McCrone 6/25/1995	3809
Ex 62 - Executive Summary of Preliminary Recommendations by the Interagency Working Group on asbestos in Consumer Products, 1/6/2020	3812
Ex 63 - CSMRI to J&J 5/18/1971.....	3819
Ex 64 - J&J “Assay of Talc in Baby Powder, 5/14/1971	3823
Ex 65 - J&J report 10/1980	3825
Ex 66 - RJ Lee to Mr. Ashton of J&J 3/9/2004.....	3831
Ex 67 - McCrone on JBP 8/19/1971	3833
Ex 68 - McCrone 1/7/1972	3842
Ex 69 - Dr. Pooley 2/3/1972	3845
Ex 70 - J&J internal document 12/20/1972	3852
Ex 71 - EMV Associates for J&J 6/3/1983.....	3854
Ex 72 - RJ Lee 5/23/1989	3859
Ex 73 - McCrone to Luzenac 1/24/1994.....	3861
Ex 74 - McCrone to Luzenac 6/25/1995.....	3863
Ex 75 - Mr. Ashton to Dr. Hildick-Smith 4/9/1969.....	3866

VOLUME IX

Ex 76 - Dr. Hildick-Smith regarding Dr. Cooper, 7/30/1971.....	3869
Ex 77 – J&J Alternate Domestic Talc Sources 04/15/1969	3872
Ex 78 - J&J’s privilege log (excerpt) from the deposition of Nancy Musco 2/15/2019	3875
Ex 79 - Deposition of Nancy Musco (excerpt) 2/15/2019	3902
Ex 80- J&J memorandum on the <i>Westfall</i> case 7/15/1981.....	3977
Ex 81 - J&J on <i>Jolly</i> case 12-3-1982	3980
Ex 82 - J&J list of inhalation complaints 6/17/1985.....	3982
Ex 83 - Schedule I to J&J-Cyprus contract 12/30/1988	3987
Ex 84 - Luzenac to J&J 10/17/1994.....	3990
Ex 85 - Ex. 21 to the deposition of James Mittenthal 10/18/2018.....	3993
Ex 86 - McCrone to Dr. Hutchinson, 10/5/1972	3995
Ex 87 - Report of Dr. Sanchez in Hirshberg (excerpt) 4/2/2021.....	3997
Ex 88 - CSMRI to J&J 8/13/1971	4026
Ex 89 - J&J’s Interrogatory Responses, <i>Eggers v. Colgate-Palmolive Co.</i> ,	4029
Ex 90 - CSMRI to J&J 6/8/1973.....	4087
Ex 91 - McCrone report to J&J without percentages 10/27/1972	4094
Ex 92 - Dr. Hopkins deposition (excerpt) 8/16/2017	4098
Ex 93 - Deposition of James Mittenthal 10/18/2018	4102
Ex 94 - Deposition of J&J designee James Mittenthal (Vol. 3 of 3) dated 10/19/2018	4114
Ex 95 - <i>Coker</i> legal hold 10/6/1997	4132
Ex 96 - <i>Krushinski</i> legal hold 11/11/1999.....	4137
Ex 97 - J&J trip report 11/23/1993	4140
Ex 98 - George Lee files 7/1988.....	4145

Ex 99 - Talc Closet Cleanout 1/20/2000 and (d) J&J's file on all phone calls and correspondence it had with the FDA that no longer exists.	4150
Ex 100 - John O'Shaughnessy deposition (excerpt) 6/22/2021	4152
Ex 101 - J&J designee Dr. Hopkins deposition (excerpt) 8/15/2017.....	4220
Ex 102 - J&J marketing Power Point 4/28/1997	4230
Ex 103 - J&J marketing Power Point 8/18/1997	4234
Ex 104 - J&J on antagonistic personalities 11/29/1972	4237
Ex 105 - J&J's Vernon Zeitz 5/5/1975	4240
Ex 106 - J&J to FDA 9/6/1974	4255
Ex 107 - J&J to Dr. Estrin 12/17/1974	4258
Ex 108 - Testimony of Dr. Sanchez (excerpt) 5/22/2018.....	4260
Ex 109 - J&J re: Dutch Organization 9/20/1973	4263
Ex 110 - J&J's summary of submissions to the FDA 1971-1979	4271
Ex 111 - J&J letter to the CTFA (to be sent to the FDA) 3/15/1976	4285
Ex 112 - Dr. Hopkins deposition (excerpt) 8/17/2017	4287
Ex 113 - Dr. Hopkins deposition (excerpt) 4/11/2018	4297
Ex 114 - Dr. Langer to Mt. Sinai 3/17/1976.....	4305
Ex 115 - Pfizer memorandum on media coverage 3/25/1976.....	4310
Ex 116 - J&J regarding meeting with Don Ferry 10/2/1974.....	4312
Ex 117 - J&J on booklet 10/8/1974	4314
Ex 118 - J&J on trip to Italy 10/31/1974	4317
Ex 119 - J&J to UK confirming decision not to publish 11/26/1974.....	4320

VOLUME X

Ex 120 - Deposition of Nancy Musco	4322
Ex 121 - Roger Miller Affidavit (<i>Edley</i>) 7/3/1987.....	4378
Ex 122 - J&J interrogatory responses 5/23/2000 at #17	4384
Ex 123 - O'Shaughnessy Deposition, 6/30/21	4396
Ex 124 - J&J employee William Ashton's Affidavit 5/8/1989	4522
Ex 125 - J&J's Interrogatory Responses, <i>Eggers v. Colgate-Palmolive Co.</i> ,	4531
Ex 126 - J & J revealed approximately 500 additional TEM evaluations were performed at #16	4536
Ex 127 - J&J Press Release, Oct. 29, 2019.....	4542
Ex 128 - Deposition of Walgreen's designee Rudy Kucera (excerpt) 2/26/21	4546
Ex 129 - Hopkins Testimony, <i>Herford</i> , 11/3/17	4554
Ex 130 - Hearing, <i>Hirshberg v. Johnson & Johnson</i>	4564
Ex 131 - J&J's Second Supplemental Responses to Certain of Plaintiff's First Set of Interrogatories, <i>Eggers v. Colgate Palmolive Co</i>	4573
Ex 132 - Webber Deposition, 5/31/2017.....	4580
Ex 133 - Deposition of J&J designee James Mittenenthal (Vol. 1 of 3) dated 9/24/2018	4591
Ex 134 - PI's McBrayer Motion.....	4648
Ex 135 - 10/28/2021 Transcript of Record.....	4688

VOLUME XI

Plaintiffs’ Motion in Limine No. 23 to Exclude Expert Hearsay Opinions (and exhibits attached thereto), July 10, 20244793

Ex 01 - Deposition Testimony of Dr. Matthew Sanchez, *Hirshberg v. Johnson & Johnson*4800

Ex 02 - Expert Report of Matthew Sanchez PhD for Johnson & Johnson4809

Ex 03 - Van Gosen, et al., *Using the geologic setting of talc deposits as an indicator of amphibole asbestos content* (2004).....4849

Ex 04 – Deposition Testimony of Dr. Matthew Sanchez (“Dr. Sanchez Depo.”), *Hirshberg v. Johnson & Johnson, et al.*, King County, Washington, dated April 5, 20214870

Ex 05 – Email from J&J’s Counsel stating Dr. Sanchez could not locate the e-mail he testified about, dated 4/15/10.....4875

J&J Defendants’ Motion in Limine to Partially Exclude Opinions of Dr. Steven Haber with exhibits, July 10, 20244877

Ex A - Plaintiffs’ Fact & Expert Witness Designation at 2-5, *Perry*, June 10, 20244886

Ex B – Haber Depo., *Garcia*, July 27, 20214901

Ex C – Haber Depo., *Chapman*, Sept. 6, 20224910

Ex D – Haber Depo., *Roy*, Jan. 13, 20224915

Ex E – Haber Depo., *Moore*, Nov. 24, 20214926

Ex F- Haber Depo., *Hirshberg*, Feb. 23, 20214930

Ex G - Haber Depo., *Perry*, June 24, 20244934

Ex H - Order in *Lynne Roy v. Colgate-Palmolive Co., et al.*, No. 2020-02718 (La. Dist. Ct. May. 4, 2023).....4944

J&J Defendants’ Motion in Limine No. 2 to Exclude Each and Every Exposure/Cumulative Dose Causation Opinions, July 10, 2024 – no exhibits4969

J&J Defendants’ Motion in Limine No. 5 to Exclude Plaintiffs’ Summary Evidence Charts, with exhibits, July 10, 2024.....4989

Ex A - Decades of Evidence” chart4997

Ex B – *Perry*, June 24, 2024, Haber Dep.5014

Ex C – Dr. Haber’s Reference List5019

Ex D – five-page summary compilation entitled “J&J’s Internal Documentation5096

J&J Defendants’ Motion in Limine No. 8 to Exclude evidence, argument, regarding Certain Advertising Campaigns that Focused on Babies and the Mother-Infant Bond, with exhibits, July 10, 20245102

Ex A - Baby Camp PowerPoint5107

Ex B – Vol. I, Michael L. Perry Dep., October 10, 2023 5110

Ex C – Vol. II, Michael L. Perry Dep., October 11, 2023, 5116

Ex D – Supplemental Answers to Master Interrogatories, June 10, 20245120

Ex E - Feb. 26, 2019 Trial Tr., *Rimondi, et al. v. BASF Catalysts LL, et al.*, Superior Court of New Jersey, Middlesex County, Law Division, Docket No. MID-2912-17AS..... 5139

Plaintiffs’ Motion in Limine No. 22 – Ex. 60 – McCrone Letter, July 11, 2024	5174
--	------

VOLUME XII

Plaintiffs’ Motion in Limine No. 19 to Exclude the 1986 Letter From H.W. Swanson to Phillippe Douillet (and exhibits attached thereto), July 15, 2024.....	5178
Ex 01 - Swanson Letter” and attachments parts IV to VII	5186

J&J Defendants’ Motion in Limine to Partially Exclude the Opinions of Dr. David Madigan with exhibits A to BB, July 23, 2024 –.....	5339
Ex A - July 15, 2024 <i>Perry</i> Madigan Dep excerpts	5353
Ex B - July 16, 2024 <i>Perry</i> Longo Dep excerpts	5369
Ex C - Madigan May 1, 2024, Report, <i>Talc, Asbestos, and Mesothelioma</i>	5377
Ex D – <i>Zimmerman</i> Madigan Dep. excerpts	5395
Ex E – <i>Lanzo</i> Madigan Dep. excerpts	5399
Ex F – <i>Citizen</i> Madigan Dep. excerpts.....	5411
Ex G - Compton 05/07/20 <i>Lopez</i> Dep. excerpts	5416
Ex H - Moline 06/11/20 <i>Lopez</i> Dep. excerpts.....	5427
Ex I - Gordon, et al., <i>Asbestos in Commercial Cosmetic Talcum Powder as a Cause of Mesothelioma in Women</i> , J. Occup. & Envir. Health (2014) (“Gordon 2014”)	5432
Ex J - Steffen et al., <i>Serous Ovarian Cancer Caused by Exposure to Asbestos and Fibrous Talc in Cosmetic Talc Powders—A Case Series</i> , J. Enviro. Occupational Medicine (2020)	5450
Ex K - MAS Chart of J&J Testing at 1 (M65205-001).....	5464
Ex L - Longo 9/21/19 <i>Weirick</i> Tr. Excerpt	5501
Ex M - <i>Davis</i> Madigan Dep. excerpts.....	5505
Ex N - Longo Expert Report	5513
Ex O - 10/30/23 <i>Lanzo</i> Longo Dep. excerpts	5526
Ex P - 4/25/2024 <i>Clark</i> Madigan Dep. excerpts.....	5530
Ex Q - Madigan General Report	5534
Ex R - <i>Alfaro v. Imerys Talc Am. Inc.</i> , 2017 WL 3668610, at *9 (Cal. Ct. App. Aug. 25, 2017).....	5560
Ex S - <i>Barlow v. ACandS, Inc.</i> , Consolidated No. 24X11000783, at 16–17 (Bal. Cir. Ct. Nov. 13, 2015)	
Ex T - <i>Greene v. ACandS, Inc.</i> , Consolidated No. 24X16000314, (Bal. Cir. Ct. May 16, 2017).....	5574
Ex U - <i>Nosse v. ArvinMeritor, Inc.</i> , LASC No. BC603354, Motion Hearing Tr. 41:16–24 (Cal. Super. Ct. Jun. 29, 2016).....	5578
Ex V - <i>Schoeniger v. Colgate-Palmolive Co.</i> , Dkt. No. MID-L-5869-16AS, Mot. Hr’g Tr. (N.J. Super. Ct. Oct. 19, 2017)	5598
Ex W - <i>Fishbain v. Colgate-Palmolive Co.</i> , Dkt. No. MID-L-5633-13 AS, Ruling at 7 (N.J. Super. Ct. Aug. 6, 2015)	5630
Ex X - <i>Ingham</i> Madigan Dep. Excerpts.....	5647
Ex Y - <i>Ingham</i> Madigan Tr. Excerpts	5653
Ex Z - Garcia, Madigan <i>Asbestos and Mesothelioma</i> Report	5658

VOLUME XIII

Ex AA - 2/7/2020 *Birch* Madigan Dep. excerpts5678
Ex BB - *Hamilton* Madigan Dep. excerpts5684

J&J Defendants’ Motion in Limine to Exclude Evidence of or Reference to Tissue Testing with exhibits, July 23, 20245689
 Ex A - Email Correspondences5694
 Ex B - Email Correspondences5710
 Ex C - Order Granting Joint Motion. On July 14, 2024.....5715
 Ex D – Longo Dep., *Perry*, July 16, 2024 excerpts5720

Plaintiffs’ Consolidated Response in Opposition to Defendants’ Motions in Limine to Exclude or Limit Causation Testimony of Plaintiffs’ Experts Witnesses (and exhibits attached thereto), July 24, 2024 –5725
 Ex 01 - *Jolly v. General Electric Co.*, No. 2016-CP-42-1592 (S.C. Com. Pl. Dec. 15, 2017) 5758
 Ex 02 – *Garvin v Agco* Order 11/14/14.....5798
 Ex 03 - *Brody Depo., Voelker v. Alfa Laval, Inc.*, 5/8/15.....5839
 Ex 04 - *Brody Dep., Bodine v. 3M Company*, 11/13/14.....5868
 Ex 05 - *Larson v. Bondex Int’l*, No. 09-691235889
 Ex 06 - *Dr. Haber curriculum vitae*.....5895
 Ex 07- *Dr. Haber report 6/11/2021*5906
 Ex 08 - *Dr. Haber (Exhibit D) Johnson & Johnson General Report 10/27/2023*.....5909
 Ex 09 - *Dr. Haber report 11/8/2023 – Exhibit C*.....5933

VOLUME XIV

Ex 10 - *Haber Report, 3/30/23*.....6030
Ex 11 – *Declaration of Dr. Longo, Prudencio v. Johnson & Johnson (5/13/21)*.....6191
Ex 12 - *Transcript of Proceedings, In Re Johnson & Johnson Powder Products Marketing, Sales Practices (“J&J Daubert Hearing”)-*6209
Ex 13 - *Declaration of William Longo, Ph.D., Anderson v. Avon Products, Inc.*.....6219
Ex 14 – *Letter, Krishnamoorthi to Hahn (3/3/20)*.....6259
Ex 15 - *Steffen, Serous Ovarian Cancer Caused by Exposure to Asbestos and Fibrous Talc in Cosmetic Talc Powders – A Case Series (2020)*.6264
Ex 16 - *Order, Ingham v. Johnson & Johnson (6/4/18)*6278
Ex 17- *Excerpt Transcript of Proceedings, Henry v. Brenntag (9/14/18)*.....6286
Ex 18 - *Notice of Ruling on Defendants’ Motions in Limine, Blinkinsop v. Albertsons Companies, Inc. (2/26/19)*6298
Ex 19 - *Transcript of Trial Proceedings, Zimmerman v. Whittaker Clark & Daniels (4/22/21)*6305
Ex 20 - *Excerpt of Transcript of Proceedings, Chapman v. Avon Products, Inc. (12/12/22)*.....6323
Ex 21 - *Johnson & Johnson Baby Products Company correspondence from W. Ashton to J.P. Grange, Subject: Talc Asbestos, L. Paoletti (9/26/84)*6328
Ex 22 - *Decades of Evidence summary chart*6346
Ex 23 - *Bird, A Review of the Talc Industry’s Influence on Federal Regulation and Scientific Standards for Asbestos in Talc*.....6363

Ex 24- Chart of Johnson & Johnson Positive Testing.....	6417
Ex 25 - Dr. Madigan report “Asbestos and Mesothelioma” 4/1/2023	6423
Ex 26- Dr. Madigan report “Talc, Asbestos and Mesothelioma” 9/1/2023	6444
Ex 27 - Dr. Madigan report “Talc and Asbestos – J&J” 9/21/2021	6459
Ex 28 - Kanarek, Asbestos in Talc and Mesothelioma: Review of the Causality Using Epidemiology, Med. Res. Archives, Vol. 8 (5): 2020.....	6485
Ex 29- IARC Monograph “Asbestos” 2012 at pgs. 219, 234, 280, 293, 294.....	6499
Ex 30- Magnani, “Italian Consensus Conference on Malignant Mesothelioma of the Pleura. Epidemiology, Public Health and Occupational Medicine Related Issues,” Med Lav 2015	6508
Ex 31 - Consensus Report: Asbestos, asbestosis, and cancer: the Helsinki criteria for diagnosis and attribution	6517
Ex 32- Consensus Report: Asbestos, asbestosis, and cancer: the Helsinki criteria for diagnosis and attribution 2014, Scand J Work Environ Health.....	6524

VOLUME XV

Ex 33 - Guide for Ship Scrappers: Tips for Regulatory Compliance, p. 2-6 (Summer 2000)	6536
Ex 34 - OSHA Website, Safety and Health Topics: Asbestos, https://www.osha.gov/SLTC/asbestos ,	6547
Ex 35 - IARC Monographs on the Evaluation of Carcinogenic Risks to Humans, Vol. 14, Asbestos, § 5.2	6553
Ex 36 - National Cancer Institute Mesothelioma Fact Sheet.....	6556
Ex 37 - NIOSH Revised Recommended Asbestos Standard 1976	6568
Ex 38 - WHO Air Quality Guidelines, Chapter 6.2 Asbestos	6581
Ex 39 - CPSC Ban of Consumer Patching Compounds Containing Respirable Free- Form Asbestos,	6596
Ex 40 - Landrigan et al., The Hazards of Chrysotile Asbestos: A Critical Review, IND HEALTH 37:271-280, 275 (1999)	6610
Ex 41- Hillerdal, Mesothelioma: Cases Associated with Non-Occupational and Low Dose Exposures, OccUP ENVIRON MED 56:505-513, 510 (1999).	6621
Ex 42 - Welch, Asbestos Exposure Causes Mesothelioma, But Not This Asbestos Exposure: An Amicus Brief to the Michigan Supreme Court, INT J OccUP ENVIRON HEALTH 13:318-327 (2007).....	6631
Ex 43 - Joyce Rost v. Ford Motor Company, No. 56 EAP 2014 (Pa. April 7, 2015).....	6642
Ex 44 - Iwatsubo, et al, Pleural Mesothelioma: Dose-Response Relation at Low Levels of Asbestos Exposure in a French Population-based Case-Control Study, AM J EPID 148(2):122-142 (1998)	6685
Ex 45 - Rodelsperger et al., Asbestos and Man-Made Vitreous Fibers as Risk Factors for Diffuse Malignant Mesothelioma: Results From a German Hospital-Based Case-Control Study, AM J INDUS MED 39: 262-275, 262 (2001).....	6696
Ex 46 - Rolland, Risk of pleural mesothelioma: A French population-based case- control study (1998-2002) (Oct. 20, 2006).	6711
Ex 47 - A. Lacourt et al., Occupational and non-occupational attributable risk of asbestos exposure for malignant pleural mesothelioma, Thorax, published online, at Table 4 (Feb. 7, 2014).....	6714

Ex 48 - Dr. Markowitz, Asbestos-Related Lung Cancer and Malignant Mesothelioma of the Pleura: Selected Current Issues, Semin Respir Crit Care Med 36:334-346, 336, Table 1 (2015)	6725
Ex 49 - Smith and Wright, Chrysotile Asbestos Is the Main Cause of Pleural Mesothelioma, AM J IND MED 30:252-266, 255 (1996).....	6739
Ex 50 - Kanarek, Mesothelioma from Chrysotile Asbestos: Update, ANN EPIDEMIOL 21:688-697, 695 (2011)	6756
Ex 51 - R.P. Everatt et al., Occupational Asbestos Exposure Among Respiratory Cancer Patients in Lithuania, Am. J. Indus. Med., Supplement 50:455-463 (2007).....	6767
Ex 52 - M.T. Madkour, Environmental exposure to asbestos and the exposure-response relationship with mesothelioma, E. Mediterranean Health J. 15(1):25-38 (2009)	6777
Ex 53 - Bianchi, Latency periods in asbestos-related mesothelioma of the pleura, EUR J CANCER PREV 6:162-166 (1997).	6792

VOLUME XVI

Plaintiffs' Response to Johnson & Johnson Defendants' Motion in Limine to Partially Exclude the Opinions of Dr. Steven Haber (and exhibits attached thereto), July 24, 2024	6798
Ex 01 - Trial Tr., 2/27/23, Plant v. Avon Prods, Inc., S.C. Court of Common Pleas, Richland Cty, at 682-769	6781

VOLUME XVII

Ex 02 – Haber Aff., 4/4/24, Newton, at 1-2	7178
Ex 03 - Haber, supra, Malignant Mesothelioma: A Clinical Study of 238 Cases	7366
Ex 04 - Trial Transcript, Chapman v. Avon Products, Inc., No. 22STCV05968 (Oct. 26, 2022), at 180:23-187:4.....	7374
Ex 05 - Trial Transcript, Chapman v. Avon Products, Inc. (October 27, 2022), at 45:3-11	7427
Ex 06 - Excerpts of Trial Transcript, Hirshberg v. Johnson & Johnson, No. 20-2-05603-1 SEA (May 10, 2021).....	7478
Ex 07 - Excerpts of Trial Transcript, Chatfield v. Avon Products, Inc., No. 21CV40522 (Feb. 26, 2023).	7529
Ex 08 - Judgment, Roy v. Colgate-Palmolive Co., No. 2020 – 02718 (May 4, 2023)....	7545
Ex 09 - Reasons for Judgment, Roy v. Colgate-Palmolive Co., No. 2020 - 02718 (May 4, 2023).....	7551
Ex 10 - Excerpts of Trial Transcript, Salcedo v. Johnson & Johnson (March 25, 2024)	7572
Ex 11 – Haber Dep., 11/15/21, Moore, at 248:2-21	7596
Ex 12 - Ghio and Roggli, Letter to the Editor: Talc Should Not Be Used in Pleurodesis in Patients with Nonmalignant Pleural Effusions.....	7661

VOLUME XVIII

Ex 13 - Haber Dep., Vol. II, 11/24/21, Moore, at 463:25-464:5	7664
Ex 14 - Hinch to Luckewicz, 12/18/87 (acknowledging that TEM limit of detection is 0.003% compared to XRD at 0.5%).....	7729

Ex 15 - Report of CTFA Talc Subcommittee on Method to Detect Chrysotile and Tremolite in Talc, 12/10/73	7733
Ex 16 - Practical Aspects of Talc and Asbestos, at 409 (Nov. 1978).....	7741
Ex 17 - Lemen, Asbestos in Brakes: Exposure and Risk of Disease, Am J Indus Med 45:229-237, 234 (2004)	7751
Ex 18 - Rohl, Consumer Talcums and Powders: Mineral and Chemical Characterization 261 (1976).	7761
Ex 19 - Rohl, Consumer Talcums and Powders: Mineral and Chemical Characterization 261 (1976).	7792
Ex 20 - Rohl Asbestos in Talc, Env Health Persp J, 9:129-132, 129 (Dec 1974	7798
Ex 21 - Dana, A Textbook of Mineralogy, at 678	7803
Ex 22 - Pfizer Technical Report for Ceramic Materials, Jan. 1967	7813
Ex 23 - Moline, J., et. al., Mesothelioma associated with the use of cosmetic talc (2020);.....	7819
Ex 24 - Emory, TS, et al., Malignant mesothelioma following repeated exposures to cosmetic talc: A case series of 75 patients (June 2020	7827
Ex 25 - Consensus Report: Asbestos, asbestosis, and cancer: the Helsinki criteria for diagnosis and attribution, Scand J Work Environ Health, 23:311-316, 311 (1997)	7834
Ex 26 - Hearing Transcript, Henderson, at 2:7-12 (denying the defendants' motion).....	7842
Ex 27 - Hearing Transcript, Hirshberg v. Johnson & Johnson (April 29, 2021), at 132:16-23	7846
Ex 28 - Relevant excerpts of the Position Statement of the Societies of Epidemiology 6/4/2012	7851
Ex 29 - Relevant excerpts of the IARC Monograph on Asbestos 2012, at 219, 234, 238,280, 293, 294	7879
Ex 30 - Kanarek, Asbestos in Talc and Mesothelioma: Revie of the Causality Using Epidemiology, Med. Res. Archives, Vol. 8 (5) (2020).	7891
Ex 31 - Magnani, "Italian Consensus Conference on Malignant Mesothelioma of the Pleura. Epidemiology, Public Health and Occupational Medicine Related Issues," Med Lav 5:106, 325-332, at 328 (2015).	7905
J&J Defendants' Opposition to Plaintiffs' Motion in Limine No. 15 to Exclude Any Speculative Testimony that Blames Laboratory Contamination for the Presence of Asbestos in a Talc Sample with exhibits, July 24, 2024.....	7914
Ex A – Dep. of R. Mark Bailey, P.G., <i>Garcia v. Colgate-Palmolive Co.</i> , May 23, 2018 (“Garcia Bailey Dep.”) excerpts	7922
Ex B - Dep. of Matthew Sanchez, Ph.D., <i>Hirshberg v. Johnson & Johnson</i> , March 1, 2021 (“ <i>Hirshberg</i> Bailey Dep.”) excerpts.....	7926
Ex C - Curriculum Vitae for Matthew S. Sanchez, Ph.D.....	7932
J&J Defendants' Opposition to Plaintiffs' Motion in Limine No. 17 to Preclude the Testimony of Dr. Gregory Diette with exhibits, July 24, 2024	7939
Ex A - Diette <i>Perry</i> Rep. excerpts	7949
Ex B - February 28, 2023, <i>Payne/Plant</i> MIL Order	8048

Ex C - Diette’s <i>Perry</i> Supp. Ex. Rep	8054
Ex D - Garcia, March 20, 2024, Brody Trial Tr. excerpts	8093
Ex E - February 22, 2021, Brody <i>Eggers</i> Dep. excerpts	8098
Ex F – Diette Dep., July 3, 2024 excerpts	8102

VOLUME XIX

J&J Defendants’ Opposition to Plaintiffs’ Motion in Limine No.19 to Exclude the 1986 Letter from H.W. Swanson to Phillippe Douillet with exhibits, July 24, 2024	8016
Ex A - FDA’s certificate of authenticity and 1986 FDA Response.....	8114
Ex B - 2018.11.09 <i>Boyd-Bostic</i> Trial excerpts	8305
Ex C - 11/15/72 letter to Dr. Goudie (DX7052).....	8309
Ex D - 2024.05.23 <i>Lee</i> Trial excerpts	8311
Ex E - 2024.03.22 <i>Garcia</i> trial excerpts	8316

VOLUME XX

J&J Defendants’ Opposition to Plaintiffs’ Motion in Limine No. 22 Seeking Evidentiary Sanctions Based on Spoliation of Evidence with exhibits, July 24, 2024	8320
Ex 1 to 11- (Hood) Johnson & Johnson Defendants memorandum in opposition and supporting exhibits, October 25, 2021	8325
McBrayer Order	8917

VOLUME XXI

J&J Defendants’ Reply in Support of Omnibus Motion in Limine No. 5 to Exclude Plaintiffs’ Summary Evidence Charts with exhibits, July 29, 2024	8929
Ex A - January 6, 2024, Kuffner <i>Eggers</i> Dep. excerpts	8934
Ex B – Eggers- Def J&J March 21 Supplemental Response to Plainiff’s First Set of Interrogatories and Request for Production.....	8941
Ex C - August 11, 2022, <i>Payne</i> Pfizer Dep. excerpts	9403

VOLUME XXII

J&J Defendants’ Opposition to Plaintiffs’ Motion in Limine No. 21 to Exclude Testimony of Dr. David Weill with exhibits, July 29, 2024.....	9412
Ex A - February 28, 2023, <i>Payne/Plant</i> MIL Order	9424
Ex B - July 11, 2024, Weill <i>Perry</i> Rep.	9434
Ex C - Weill Curriculum Vitae	9565
Ex D - July 18, 2024, David Weill Dep. excerpts	9581
Ex E - <i>Garcia</i> , March 20, 2024, Brody Trial Tr. excerpts.....	9587
Ex F - February 22, 2021, Brody <i>Hirshberg</i> Dep. excerpts	9591
Ex G - July 12, 2024, Weill <i>Perry</i> Supp. Report	9594
Ex H - June 24, 2024 <i>Perry</i> Longo Dep. excerpts.....	9597

J&J Defendants’ Motion in Limine to Exclude Evidence of or Reference to Tissue Testing with exhibits, August 1, 2024	9601
Ex A –J&J Defs.’ MTE.....	9605
Ex B - Geyer Affidavit.....	9611
Ex C - Longo Dep., <i>Perry</i> , July 16, 2024	9615

Ex D - 7/31/24 K. Bueno Email Correspondence.....	9620
J&J Defendants’ Mode of Trial Motion Regarding Successor Liability and Amalgamation, August 3, 2024	9622
J&J Defendants Objection to Plaintiffs’ Proposed Instructions on Parties in Default and Conditional Motion to Sever with exhibits, August 3, 2024	9626
Ex 1 – 8/2/24 email to Atty McVey.....	9630
J&J Defendants Objection to Plaintiffs’ Proposed Order regarding Plaintiffs’ Motion in Limine No. 22 Based on Spoliation of Evidence with exhibit, August 3, 2024.....	9637
Ex A – 8/3/24 email with attachment	9640
Ex B – Redline comparison of proposed order to Hood (McBrayer) order.....	9658
J&J Defendants’ Objection to Plaintiff Efforts to Submit to the Jury Evidence of Successor Liability or Amalgamation Issued for the Court but Unrelated to Plaintiffs’ Products Liability Claims with exhibit, August 6, 2024.....	9670
J&J Defendants’ Proffer of Evidence re: Mr. Perry’s Exposure to Asbestos in the Library while working at Embassy Suites with exhibits, August 6, 2024.....	9674
Ex A - Dep. of Michael Perry excerpts	9678
Ex B - July 11, 2023 Office Visit, DX12000.398.....	9692
Ex C - Dr. Haber Report.....	9697
Ex D - January 18, 2024 Testimony of William Longo.....	9707
J&J Defendants’ Memorandum related to Procedure and Evidence for Successor Liability with exhibits, August 6, 2024	9713
Ex A – Deposition Designations of Mongon.....	9722
Ex B - Deposition Designations of Ruh.....	9767
Ex C – Proposed Joint Stipulation	9789
Ex D - Dep. of M. Perry excerpts	9792
Ex E - Notice of Commencement of Chapter 11 Case and Meeting of Creditors	9798
Ex F - 8/5/2024 Trial Tr. Excerpts	9804
J&J Defendants’ Objection to Sanctions Order, August 8, 2024	9810
VOLUME XXIII	
J&J Defendants’ Motion for Mistrial with exhibits, August 10, 2024	9813
Ex A – <i>Hood-McBrayer</i> 11/02/2021 Spoliation Order	9828
Ex B - <i>Perry</i> 7/30/2024 Tr excerpts.....	9841
Ex C – 08/05/2024 Trial Tr excerpts	9868
Ex D - 08/10/2024 Trial Tr. excerpts	9875
Ex E - 2019 Health Hazard Evaluation of Johnson’s Baby Powder (“HHE”).....	9894
VOLUME XXIV	
Ex F - Sanchez Report on Longo Samples.....	9907

VOLUME XXV

Ex G - Longo Affidavit 10407

Ex G - Longo Affidavit (CONTINUED)..... 10584

Ex H - PowerPoint Slides (Kuffner-1940s Talc). 10655

Ex I - 8/7/2024 Tr. Transcript (Longo) 10658

VOLUME XXVI

J&J Defendants’ Proposed Jury Charges and Verdict Form, Exhibit A, August 11, 202410663

Ex A – Perry v. American Int’l 8/7/2024 Transcript (Day 3).10667

VOLUME XXVII

Ex A – Perry v. American Int’l 8/7/2024 Transcript (Day 3). (Continued)10907

Plaintiffs’ Response to J&J’s Motion for Mistrial (and exhibits attached thereto), August 12, 2024.....11019

Ex 1 – Email exchange 8/1/2024 -8/4/2024.....11031

J&J Defendants’ Submission of Law Regarding Proper Causation Standard, August 12, 2024.....11038

J&J Defendants’ Proffer of Evidence re: The 1986 FDA Citizen Petition Response with exhibits, August 12, 202411041

Ex A – 1986 FDA Response11046

Ex B - 85 Fed. Reg. 51035, 51035 (August 19, 2020)..... 11237

Ex C - 11/9/2018 *Boyd-Bostic* Trial Tr. excerpts 11239

Ex D - 5/23/2024 *Lee* Trial Tr excerpts 11243

Ex E - 3/22/2024 *Garcia* Trial Tr excerpts 11248

Ex F - 12/17/2019 *Forrest* Trial Tr. excerpts..... 11252

J&J Defendants’ Proffer of Evidence re: The “Health Hazard Evaluation of Johnson Baby Powder” with exhibits, August 12, 202411259

Ex A – 2019 Health Hazard Evaluation of Johnson’s Baby Powder (HHE).....11262

Ex B - 3/14/2024 Dep. of Dr. Kuffner, Newton excerpts11275

J&J Defendants’ Memorandum regarding Successor Liability with exhibits, August 12, 2024.....11294

Ex A – Deposition Designations Thibaut Mongon, 8/14/202311307

Ex B – Deposition Designations of Paul Ruh, 8/16/2023.....11333

J&J Defendants’ Objections to Plaintiffs’ Requested Jury Charges with Exhibits, August 12, 2024.....11354

Ex A – Plaintiffs’ Requested Jury Charges.....11359

J&J Defendants’ Objections to Plaintiffs’ Proposed Verdict Form with exhibits, August 12, 2024.....	11390
Ex A – Plaintiffs’ Proposed Verdict Form.....	11394

VOLUME XXVIII

J&J Defendants’ Proffer of Evidence regarding Dr. Kuffner’s Excluded Testimony on Winchite with exhibits, August 13, 2024.....	11399
Ex A - 8/9/2024 Tr. Transcript (Kuffner) excerpts	11403
Ex B - Sanchez Report on Longo Samples	11409

VOLUME XXIX

Ex B – Sanchez Report on Longo Samples (continued).....	11900
Ex C - Longo Affidavit	12086
Ex D - PowerPoint Slides (Kuffner-1940s Talc).....	12157
Ex E - 8/7/2024 Tr. Transcript (Longo)	12160

J&J Defendants’ Motion and Memorandum in Support of Motion for Directed Verdict with exhibits, August 13, 2024	12164
--	-------

J&J Defendants’ Objections to the Court’s Final Jury Charges and Related Final Court Verdict Form, August 14, 2024	12199
--	-------

J&J Defendants’ Motion for Mistrial with exhibits, August 15, 2024 -14 pgs	12203
Ex A - Perry Trial Transcript, 8/14/2024 excerpt.....	12207
Ex B - Perry Trial Transcript, 8/14/2024 excerpt	12213

Plaintiffs’ Trial Brief on Successor Liability of The Johnson & Johnson Defendants (and exhibits attached thereto), August 22, 2024.....	12217
Ex 01 - J&J & Old JJCI Resp. to Interrog. (<i>Leavitt</i>) 3/21/2018	12242
Ex 02 -J&J & Old JJCI Resp. to Interrog. (<i>Rimondi</i>) 7/5/2018	12259
Ex 03 - Old JJCI Resp. to RFAs (<i>Garcia</i>) 7/26/2021	12264
Ex 04 - Trans. of J&J (Hopkins) 7/22/2019 at 20:11-17	12275
Ex 05 - Trans. of Mr. Kim 10/22/2021 at 45, 85, 87-89, 90-91	12283
Ex 06 - J&J (Kuffner) depo. 11/9/2023 excerpts.....	12295
Ex 07-. J&J Project Plato approval memo 10/11/2021	12317
Ex 08 - J&J e-mail 10/5/2021	12329
Ex 09 - JJCI (Goodridge) depo. 12/20/2021 at 312:8-9.....	12331
Ex 10 - Kenvue (Mongon) depo. 8/14/2023 at 22:6-11	12357

VOLUME XXX

Ex 11 - Kenvue (Ruh) depo. 8/16/2023 excerpts.....	12402
Ex 12 - Transcript of New JJCI (Goodridge) 2/14/2022 excerpts	12425
Ex 13 - Mr. Kim Declaration 4/4/2023 at ¶ 24	12471
Ex 14 - Donald McGraw Declaration (with PowerPoint) 9/18/2023.	12482
Ex 15 – Bankruptcy Court Dismissal Order dated 8/11/2023	12507
Ex 16 - <u>16(a)-(e)</u> , Agreements and Certificates 10/12/2021	12519

Ex 17- J&J “Project Plato Master Q&A” 10/10/2021 at 9 (instructing employees to state that the Texas Two Step “has no impact on our operations.”	12553
Ex 18 - Old JJCI Annual Report (NC) 4/5/2021 (listing Michelle Goodridge as president and director with Kevin Neat as Treasurer	12569
Ex 19 - New JJCI Annual Report (NC) 4/14/2022	12571
Ex 20 - Dr. Kuffner depo. 10/30/2021 at 32:5-7, 32:12-15	12573
Ex 21 - Continued Video-Recorded Deposition of Kenvue Inc. and Johnson & Johnson Holdco (NA) Inc. (through John Kim, Esq.), 8/10/24, at 60:22-25...	12597
Ex 22 - New Jersey Certificate of Amendment 12/16/2022	12705
Ex 23 - Donald McGraw depo. 9/28/2023. New JJCI 3.0 was initially incorporated in Nevada in June 2022 before converting to a Delaware corporation in January 2023	12707
Ex 24 - New JJCI 3 Certificate (NV);.....	12791
Ex 25 - New JJCI 3 Certificate of Conversion (DE).	12793
Ex 26 - Kenvue, Inc. SEC Form S-1 1/4/2023	12795
Ex 27 - Kenvue SEC Prospectus 9/18/2023	12818
Ex 28 - Kenvue LinkedIn profile compilation.....	12824
Ex 29 - Kenvue SEC S-4 8/3/2023..	12858
Ex 30- Kenvue SEC S-4 9/6/2023.....	12866
Ex 31 - Johnson & Johnson Form 10k for the year 2018	12872
Ex 32 - Order on Plaintiffs’ Motion to Compel and Motion for Sanctions Against Defendants Kenvue, Inc. and Johnson & Johnson Holdco (NA) Inc., 8/9/24	12883
Ex 33 - Oral and Videotaped Deposition of James Mittenthal as Defendant Kenvue Inc. 30(b)(6) Representative, Vol. I, 7/26/24, at 38:19-39:7	12888
Ex 34 - Video-Recorded Deposition of Kenvue Inc. (through James P. Mittenthal), Vol. II, 7/30/24, at 313:8-314:7.....	12897

VOLUME XXXI

Ex 35 - Mass. SOS filing 3/14/2022	12911
Ex 36 – Business Corp Annual Report for J&J Holdco, 12/31/2022.....	12914
Ex 37- Mittenthal Outline for Perry/ Kenvue Deposition—updated 7/25/2024, at pgs. 37-38.....	12916
Ex 38 - Draft of J&J’s Product List for the FDA, 12/5/11	12955
Ex 39 - Product List, undated (listing all baby powders under the same category: “baby powder”).....	12962

Post Trial Motions & Memos:

Plaintiffs’ Trial Brief, Ex. 10 – Dep. of Thibaut Mongon, August 22, 2024.....	12989
Plaintiffs’ Trial Brief, Ex. 13 – Decl. of John Kim, August 22, 2024	13034
Plaintiffs’ Trial Brief, Ex. 15 – Decl. of Donald McGraw, August 22, 2024.....	13045
Plaintiffs’ Trial Brief, Ex. 21 – Dep. of John Kim, August 22, 2024.....	13057

Plaintiffs’ Trial Brief, Ex. 34 – Kenvue Depo. (Mittenthal), Vol. II, 7/30/24	13165
J&J Defendants’ Motions for JNOV, New Trial Absolute Based on Errors of Law, New Trial Absolute based on the Thirteenth Juror Doctrine, and New Trial nisi Remittitur with exhibits, August 26, 2024	13179
Ex A - Trial Transcripts excerpts	13274
Ex B – Weill Kuffner (Valadez) Tr. excerpts	13390
Ex C – <i>Salcedo</i> Tr. excerpts	13398
Ex D – Arnoldy Brody (Hirshberg) 2/22/2021 excerpt.....	13402
Ex E – Longo Dep. (Yerkes/Hofmaister), 01/18/2024 excerpts	13407

VOLUME XXXII

Ex F – Perry Pre-Trial Transcript excerpts	13412
Motion to Substitute Pecos River Talc, LLC as a Party Defendant for LLT Management LLC f/k/a LTL Management, LLC, August 26, 2024	13438
J&J Defendants’ Motion for Setoff and Motion for Production of Settlement, August 26, 2024.....	13441
J&J Defendants’ Motion to Stay Execution on Judgment, August 26, 2024	13448
J&J Defendants’ Reply to Substitute Pecos River Talc, LLC as a Party Defendant for LLT Management, LLC f/k/a LTL Management, LLC, September 9, 2024.....	13453
Ex 1 – Declaration of John Kim	13456
Ex A – Amended and Restated Funding Agreement.....	13461
Plaintiffs’ Consolidated Response to Defendants’ Motion for Setoff and Production of Plaintiffs’ Settlement Agreements, September 13, 2024	13478
Plaintiffs’ Consolidated Response to Defendants’ Motions to Stay Execution of Judgment (and exhibits attached thereto), September 13, 2024.....	13483
Ex 01 – Perry v. American Int’l Trial Transcript (Day 6), 8/13/24	13488

VOLUME XXXIII

Plaintiffs’ Response in Opposition to Defendants Johnson & Johnson, LLT Management, LLC, Johnson & Johnson Holdco (NA) Inc., and Kenvue, Inc.’s Motions for JNOV, New Trial Absolute Based on Errors of Law, New Trial Absolute Based on the Thirteenth Juror Doctrine, and New Trial Nisi Remittitur (and exhibits attached thereto), September 13, 2024	13636
Ex 01 – TT 8/5/24 excerpts.....	13742

VOLUME XXXIV

Ex 02 – TT 8/6/24, excerpts	14046
Ex 03 - TT 8/7/24, excerpts	14391

VOLUME XXXV (beginning 14546)

Ex 04 – TT 8/9/24, excerpts14743

VOLUME XXXVI (beginning 15046)

Ex 05 – TT 8/12/24, excerpts 15117
Ex 06 – TT 8/13/24, excerpts15448

VOLUME XXXVII

Ex 07 – TT 8/14/24 excerpts 15596
Ex 08 - TT 8/15/24 excerpts15867

VOLUME XXXVIII

Ex 09 - Pre-Trial Hearing, 7/30/24 excerpts16048
Ex 10 - Trial Ex. 61116294
Ex 11 - Punitive Damages Verdict Form, 8/19/24..... 16301
Ex 12 - Plaintiffs’ Trial Exhibit No. 72-Chart-Decades of Evidence of Asbestos in
Johnson & Johnson Products).....16306
Ex 13 - Plaintiffs’ Trial Exhibit No. 3.....16323
Ex 14 – Plaintiff Trial Exhibit No 6216327
Ex 15 - Plaintiffs’ Trial Exhibit No. 106.....16329
Ex 16 - Plaintiffs’ Trial Exhibit No. 4916332
Ex 17 - Plaintiffs’ Trial Exhibit No. 7 16338
Ex 18 –Plaintiffs’ Trial Exhibit No. 136..... 16341
Ex 19 - Plaintiffs’ Trial Exhibit No. 193..... 16344
Ex 20 - Plaintiffs’ Trial Exhibit No. 19416347
Ex 21 –Plaintiffs’ Trial Exhibit No. 196..... 16385
Ex 22 - Plaintiffs’ Trial Exhibit No. 111..... 16389
Ex 23 - Plaintiffs’ Trial Exhibit No. 113 16408
Ex 24 - Plaintiffs’ Trial Exhibit No. 19116411
Ex 25 - Plaintiffs’ Trial Exhibits Nos. 92-9416421
Ex 26 - Plaintiffs’ Trial Exhibits Nos. 117-118.....16427
Ex 27 - Plaintiffs’ Trial Exhibit No. 18116435
Ex 28 - Plaintiffs’ Trial Exhibit No. 203.....16441
Ex 29 - Plaintiffs’ Trial Exhibit No. 10 16443
Ex 30 - Plaintiffs’ Trial Exhibit No. 90 16451
Ex 31 - Plaintiffs’ Trial Exhibit No. 55 16453
Ex 32 - Plaintiffs’ Trial Exhibit No. 61 16462
Ex 33 - Plaintiffs’ Trial Exhibit No. 5 16464
Ex 34 - Deposition of Gregory Diette, 2/3/23, at 80:13-216466
Ex 35 - *Jolly v. General Electric Co.*, Order denying Defs’ Post Trial Motions16501

VOLUME XXXIX

Ex 36 - *Garvin v. Agco Corp.*, Order denying in part and granting in part Def
Crane Co’s Motion for Post Trial Relief, 11/10/14.....16541

Ex 37 - <i>Tort Law—Expert Testimony in Asbestos Litigation—District of South Carolina Holds the Every Exposure Theory Insufficient to Demonstrate Specific Causation Even if Legal Conclusions Are Scientifically Sound</i> , 131 Har. L. Rev. 658 (Dec. 2017).....	16582
Ex 38 – Order granting Joint Motion requesting the Division of PL Perry Tissue, 7/10/24	16591
Ex 39 – Video Deposition of William E Longo 8/6/24.....	16596
Ex 40 - Johnson & Johnson Defendants’ Witness List	16630
Ex 41 - Letter from Donald Kennedy, Commissioner of Food and Drugs, dated 1/11/1979	16636
Ex 42 - Goudie, Examination of Johnson & Johnson’s Baby Powder (10/27/72)	16645
Ex 43 - Chart of Decades of Evidence of Asbestos Content in Johnson & Johnson Products at pp. 1 – 10.....	16649
Ex 44 - “Swanson Letter” and attachments (parts 44-2 to 44-7)	16666
Ex 45 - J&J Defendants’ Objections to the Court’s Final Jury Charges and Related Final Court Verdict Form, 8/14/24.....	16861
Ex 46 - Johnson & Johnson Defendants Proposed Verdict Form,	16866
Ex 47 - Notice of Joint Stipulation, 7/31/24	16876
Ex 48 - <i>Lee v. Johnson & Johnson, et al.</i> , No. 23CV40369, Circuit Court of Multnomah County, Oregon, Special Verdict Form, 6/3/24	16879
Ex 49 - <i>Salcedo v. Avon</i> , 4/19/24, Cook County, Illinois Circuit Court)	16883
Ex 50 - <i>Vanklive</i> , 12/9/21, Alameda County Superior Court.).....	16890
Ex 51 - <i>Chapman v. Avon Products</i> , 12/14/22, Los Angeles Superior Court).....	16898
Ex 52 - <i>Plant v. Whitake Clark & Daniels</i> , 3/3/23, South Carolina Court of Common Pleas	16922
Ex 53 – Hood-McBrayer Spoliation Order, 11/5/21	16926
Ex 54 - Email Exchange from Kim Bueno, Re: Perry Trial Schedule, 8/3/24	16939

VOLUME XL

J&J Defendants’ Renewed Motion for Directed Verdict and Nonsuite as a Matter of Law and J&J Defendants’ Memorandum in Support Thereof regarding Successor Liability and in Opposition to Plaintiffs’ Requests with exhibits, September 19, 2024 –	16957
Ex A – <i>LaSalle</i> - Order granting Defendants J&J Holdco and Kenvue Motion to Dismiss, 9/12/2023	16973
Ex B – <i>Egli</i> – 10/26/23 Order on Motion to Quash	16982
Ex C – Yandell – 8/15/2023 Order on Motion to Quash	16990
Ex D – Johnson & Johnson SEC Form 8-K, 05/17/2024	17000
Ex E - 08/23/2023 J&J Announces Final Result of Exchange Offer and Finalize Separation from Kenvue, Inc.	17004
Ex F – Johnson & Johnson SEC Schedule to Amendment No.4 – Tender Offer Statement.....	17008
 Plaintiffs’ Response to J&J Defendants’ Renewed Motion for Directed Verdict and Nonsuit as a Matter of Law Regarding Successor Liability (and exhibits attached thereto), September 20, 2024 – (Exhibits referenced refer to Plaintiff’s Trial brief on Successor Liability	 17013

J&J Defendants’ Objections to Plaintiffs’ Proposed Order, and Supplemental Memorandum Supporting Johnson & Johnson Defendants’ Post Trial Filings with exhibits, October 7, 2024	17027
Ex 1 – C. Brown letter to Honorable Jean Toal, 10/7/2024.....	17030
Ex 2 – Proposed Order 1 – does not rule on Successor Liability	17033
Ex 3 – Proposed Order 2 – rules on Successor Liability	17046
J&J Defendants Objection to Proposed Order on Successor Liability and Further Memorandum in Support of J&J Defendants’ JNOV and Other Legal Positions with exhibits, November 8, 2024	17059
Ex A – Plaintiffs’ Proposed Order on Successor Liability	17077
J&J Defendants’ Motion to Reconsider, December 23, 2024	17096
Plaintiffs’ Response to J&J Defendants’ Motion to Reconsider (and exhibits attached thereto), February 21, 2025	17105
Ex 01 – JJ Defendants Mode of Trial Motion re. Successor Liability and Amalgamation, 8/3/24.....	17118
Ex 02 - TT 8/5/24, excerpts.....	17123
Ex 03 - Hearing on Post-Trial Motions, Vol. II, 9/25/24 excerpts.....	17132
Ex 04 – Verdict Form, 8/19/24	17138
Ex 05 – TT 8/13/24 excerpts	17143
Ex 06 - J&J Defendants’ Objections to the Court’s Final Jury Charges and Related Final Court Verdict Form	17153
Ex 07 - J&J Defendants’ Objections to Plaintiffs’ Proposed Verdict Form, 8/12/24.....	17158
Ex 08 - Order on Defendants Johnson & Johnson; LLT Management, LLC; Johnson & Johnson Holdco (NA) Inc.; and Kenvue, Inc.’s Post-Trial Motions, 12/11/24.....	17168
Ex 09 – TT 8/6/24 excerpts.....	17255
Ex 10 – TT 8/7/204 excerpts.....	17264
Ex 11 - Mongon Depo., 8/14/23, 55:3-12.....	17274

VOLUME XLI

Transcripts:

Pre-Trial Hearing Transcript, July 30, 2024	17280
Trial Transcripts Vols I – VIII, August 5, 2024 to August 14, 2024.....	17525
Vol 1, August 5, 2024	17525

VOLUME XLII (beginning 17780)

Vol 2, August 6, 2024	17828
Vol 3, August 7, 2024.....	18172

VOLUME XLIII (beginning 18280)

Vol 4, August 9, 202418523

VOLUME XLIV (beginning 18780)

Vol 5, August 12, 202418896

Vol 6, August 13, 202419226

VOLUME XLV (beginning 19280)

Vol 7, August 14, 202419281

Vol 8, August 15, 202419643

VOLUME XLVI

Post Trial Hearing Transcripts Vols I & II19823

Vol I, September 24, 202419823

Vol II, September 25, 2024.....19981

Other:

Johnson & Johnson Defendants’ Witness List, 7/20/202420022

J&J Defendants’ Proposed Jury Charges and Verdict Form, August 11, 2024.....20027

J&J Defendants’ Notice of Appeal with exhibits, January 10, 202520190

VOLUME XLVII

J&J Defendants’ Supplemental Notice of Appeal, March 3, 2025.....20295

Supersedeas Bond, March 19, 2025.....20405

Email Correspondence:.....

Re: Perry Trial Schedule, July 29-August 2, 202420410

Re: Perry-Outstanding Issues, August 4, 202420422

Re: Perry Trial Schedule, August 6-10, 202420424

Depositions:20429

Deposition of Dr. William Longo, 8/6/24.....20429

Deposition of Michael Perry, Vol. I, 10/10/2320438

Deposition of Michael Perry, Vol. IV, 10/13/2320616

Deposition of Gregory B. Diette, M.D., 7/3/2420738

VOLUME XLVIII

Deposition of David Weill, M.D., 7/18/2420765

Trial Exhibits:

Plaintiffs’ Exhibit 1020816

Plaintiffs’ Exhibit 4020823

Plaintiffs’ Exhibit 4920825

Plaintiffs’ Exhibit 7220830

Plaintiffs' Exhibit 117	20846
Plaintiffs' Exhibit 289	20849
Plaintiffs' Trial Ex. 4274	20855

I certify that this Designation does not contain any matters which are irrelevant to this appeal.