

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

CERTIFIED COPY

JAYNE PALMISANO, et al.,)
)
 Plaintiffs,)
)
 -vs-)
)
 OLIN CORPORATION, et al.,)
)
 Defendants.)
)
 -----)
 AND RELATED CASES.)
 -----)

CASE NO. C 03-01607 RMW

VIDEOTAPED DEPOSITION OF DAVID L. BAUER

DATE: March 4, 2005

TIME: 9:11 a.m.

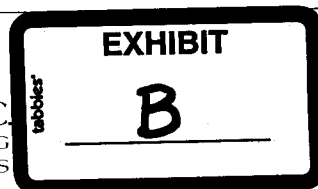
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DEPOSITION OF DAVID L. BAUER

1 Q. You're not an expert in agricultural production 10:51:00a
2 I take it? 10:51:05a
3 A. Actually, I know a great deal about 10:51:06a
4 agricultural production, but from 20,000 feet it's hard 10:51:09a
5 to tell. 10:51:13a
6 Q. Do you have an understanding that the 10:51:14a
7 agricultural practices in San Martin and Morgan Hill 10:51:15a
8 included the application of fertilizers to its row crops 10:51:18a
9 and orchards? 10:51:24a
10 A. Well, I'm certain it did. 10:51:25a
11 Q. Okay. Are you familiar with Chiléan 10:51:27a
12 fertilizer? 10:51:30a
13 A. Yes. 10:51:31a
14 Q. You have an understanding that Chiléan 10:51:31a
15 fertilizer contains perchlorate? 10:51:34a
16 A. Some fraction, yes. 10:51:35a
17 Q. Do you know what the fraction is? 10:51:37a
18 A. It varies tremendously. 10:51:38a
19 Q. Okay. Have you seen data suggesting that for 10:51:40a
20 every 1,000 pounds of Chiléan fertilizer there is two 10:51:43a
21 pounds of perchlorate? 10:51:47a
22 A. I haven't seen that number. I've seen ranges. 10:51:48a
23 Q. Okay. What are the ranges that you've seen? 10:51:52a
24 A. From almost nothing to a few pounds. 10:51:55a
25 Q. Per thousand pounds of fertilizer? 10:51:58a

