

# EXHIBIT G

1 07-E-93142

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UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF FLORIDA  
ORLANDO DIVISION

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5 IN RE: Seroquel Products Liability Litigation

6 MDL DOCKET NO. 1769

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8 This Document Relates to 6:07-cv-15736

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ORAL DEPOSITION OF

12

CHRISTINE M. HERNANDEZ

13

August 15, 2007

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Volume 1

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ORAL DEPOSITION of CHRISTINE M. HERNANDEZ, produced

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as a witness at the instance of the Defendants, AstraZeneca

18

Pharmaceutical LP and AstraZeneca LP, and duly sworn, was taken

19

in the above-styled and numbered cause on the 15th of August,

20

2007, from 10:01 a.m. to 5:05 p.m., before Shanon M. Hair, CSR

21

in and for the State of Texas, reported by machine shorthand,

22

at the law offices of Bailey Perrin Bailey LLP, 440 Louisiana

23

Street, Suite 2100, Houston, Texas 77002, pursuant to the

24

Federal Rules of Civil procedure and the provisions stated on

25

the record or attached hereto.

1 so my answer would be two different questions because I keep a  
2 calendar and I keep a log of everything else.

3 Q. Let me -- if you don't understand my question, ask me  
4 to stop and I'll rephrase it. I don't want you to be confused.

5 A. Okay.

6 Q. So, you keep a calendar that lists all of your  
7 doctors appointments, correct?

8 A. Yes.

9 Q. And that covers the time period from 1989 to present?

10 A. Yes.

11 Q. And that would include doctors that you saw for any  
12 of your psychiatric conditions?

13 A. All.

14 Q. All doctors?

15 A. Yes.

16 Q. Do you keep another calendar or document that lists  
17 all the medications you've taken?

18 A. Yes, I do, sir.

19 Q. Is it in the same calendar or different calendar?

20 A. It's a different calendar. I wouldn't call it a  
21 calendar. That's why I'm saying -- I have logs.

22 Q. Okay. So, do you have a log of all the medication  
23 you've taken?

24 A. Yes, sir.

25 Q. How far back does that logbook go?

1 A. 1989.

2 Q. All right. So, we have the calendar with the  
3 doctors -- all the appointments from 1989 to present, correct?

4 A. Uh-huh.

5 Q. And we have the log from -- listing all the  
6 medications you've taken from '89 to present, correct?

7 A. Yes.

8 Q. Are there any other logs or diaries you keep that  
9 would track medications or doctor visits?

10 A. I keep a separate log -- this is crazy. I keep a  
11 separate log of how I'm feeling. It's a therapeutic thing.  
12 That one doesn't go as further back as 1989. But somewhere, I  
13 would say, in '91, I started that one; moods, things that I do  
14 during the days -- so, I do keep --

15 Q. All right. So, there's a third log that you keep,  
16 correct?

17 A. Yes.

18 Q. And that's the --

19 A. I have a fourth one, too.

20 Q. We'll get to it. And the purpose is just so we  
21 understand what you have.

22 A. Okay.

23 Q. So, this is helpful. So the third log, so I  
24 understand it, you started to keep in roughly 1991, correct?

25 A. Uh-huh.

1 Q. And the third log, you would write down how you are  
2 feeling?

3 A. Uh-huh.

4 Q. Correct?

5 A. Yes, sir.

6 Q. Would that include -- would the log -- the third log  
7 include how you're feeling mentally and physically?

8 A. Yes, sir.

9 Q. Do you have a name for that log?

10 A. No, not really. I just know where to go and get it.

11 Q. Okay. So, the third log would include how you felt  
12 mentally and physically from 1991 through the present; is that  
13 right?

14 A. Uh-huh. Yes.

15 Q. Okay. Does that third log include anything else  
16 other than your -- how you're feeling mentally and physically?

17 A. Yeah, my daily things, important things I would do in  
18 the day. "I saw so-and-so. I called so-and-so. I met  
19 so-and-so." Yeah, work things.

20 Q. Okay. So, in addition to the mental and physical  
21 feelings you were having, the third log would also include,  
22 like, your daily activities; is that right?

23 A. Oh, yes.

24 Q. If you went to the store, would that be included in  
25 the log?

1 A. Yes.

2 Q. And if you went -- if you went to the dry cleaner,  
3 would that be included in the log?

4 A. Sometimes, yes.

5 Q. And so routine -- even routine daily activities would  
6 be included in the third log?

7 A. Yes.

8 Q. Would there be anything else that would be in that  
9 third log we're discussing right now that we haven't talked  
10 about?

11 A. I don't think you want to hear about that.

12 Q. No. No. We -- we do want to hear about that, so --

13 A. Okay. If you -- if I had sex that day, I would write  
14 it down because I would want to know if I got pregnant along  
15 the way. So, yes, it would be in my log. We women do things  
16 like that.

17 Q. So, in addition to discussing the third log, your  
18 sexual activity would also be included in there?

19 A. Uh-huh. Exactly.

20 Q. How many volumes is this third log?

21 A. I would say about a 9-gallon thing I have full with  
22 notebooks and those other logs.

23 MR. BROWN: Ms. Hernandez is indicating a box  
24 maybe 2 or 3 feet long.

25 A. It's bigger than that. It's, like, a big thing. I

1 have three of them and one is for medical, one is for my  
2 calendars, like I said, and the other one keeps my logs.

3 Q. So, the -- let me just take one little step back in  
4 time. So, the -- on the calendars for the doctors visits, is  
5 that also a multi-volume set?

6 A. Yes.

7 Q. How many volumes would -- let me just finish.

8 A. Okay.

9 Q. How many volumes would the doctors calendar contain?

10 A. One per year.

11 Q. One per year?

12 A. Yes, one calendar per year.

13 Q. So, you have approximately, I guess, 18 calendars?

14 A. He's -- yes, sir.

15 Q. For the doctors visits?

16 A. Yes. That's what I'm saying. I have three 9-gallon  
17 big totes.

18 MR. BROWN: Didn't bring those with you, did  
19 you, Ryan?

20 MR. HICKS: No, no, I did not.

21 A. They're there.

22 Q. (BY MR. BROWN) And the -- and just to clarify, on  
23 the -- on the second -- the second log we talked about that  
24 contains your medications, correct --

25 A. Uh-huh.

1 I would say a "no" to that.

2 Q. The third log that contains your daily activities,  
3 among other things, you have approximately 16 volumes of that,  
4 from 1991 to the present; is that right?

5 A. Uh-huh. That's correct.

6 Q. All right. We've talked about three items here, the  
7 calendar --

8 A. Uh-huh.

9 Q. -- correct?

10 A. Yes.

11 Q. The medication volumes, correct?

12 A. Yes.

13 Q. And the daily activity volumes which you've described  
14 to us, correct?

15 A. Yes.

16 Q. Are there any other --

17 A. Logs.

18 Q. -- logs that you keep regarding anything?

19 A. I have a menstrual period log.

20 Q. Is that a separate log?

21 A. Yes, sir.

22 Q. Okay. When did you start to keep the menstrual cycle  
23 log?

24 A. Five years ago.

25 Q. So roughly 2002?



1 A. Yes.

2 Q. Does it feel good for you to keep track of your  
3 medications?

4 A. To keep track of my life, yeah. So, it would include  
5 medications, yes.

6 Q. So, keeping these logs help you feel like you're  
7 keeping control of your life; is that right?

8 A. Yes.

9 Q. And I'm going to ask you the same question about the  
10 doctors visits log. Does that -- why did you start keeping the  
11 log for the doctors visits?

12 A. That I can answer easily, because most the time when  
13 you go to the doctor, they ask you what doctor you went before,  
14 what did they tell you -- so, that's where they started coming  
15 into play. It was getting hard to answer when you had doctors  
16 visits or who you went to, so I started keeping a log so that I  
17 just carry that and just fill out the forms.

18 Q. Did you tell your lawyers that you had the three  
19 boxes --

20 A. No, sir.

21 Q. -- of documents?

22 A. You're first hearing of this now.

23 Sorry, Ryan.

24 MR. HICKS: That's okay.

25 MR. BROWN: Ryan, I'm just going to put a

1 request on the record which I'll follow up in writing for  
2 the -- the multi-volume set of the medical appointments, the  
3 multi-volume log for the medications, and the multi-volume set  
4 for the daily activities.

5 A. Okay.

6 MR. BROWN: As well as the multi-volume set for  
7 the menstrual cycle.

8 Q. (BY MR. BROWN) Are there any -- we've talked about  
9 four different collections of materials that you keep track of.  
10 Are there any other logs, calendars, or charts that you keep  
11 for any reason whatsoever?

12 A. My personal?

13 Q. Yes.

14 A. No.

15 Q. Do you have a computer at home?

16 A. Yes, sir.

17 Q. How long have you had the computer?

18 A. This one or any computer?

19 Q. This particular computer.

20 A. 2001.

21 Q. Do you use your computer relatively regularly?

22 A. Maybe every other day.

23 Q. And we've talked about a number of different logs,  
24 four different calendars or logs. Is that information kept on  
25 your computer?

1 deposition notice. Do you see that?

2 A. Uh-huh.

3 Q. Can you just read through it for me?

4 A. The -- the first page?

5 Q. Read through the whole document for me.

6 A. It's says "In regard" --

7 Q. I'm sorry. You don't need to read it aloud. Just  
8 read it to yourself.

9 A. Oh, okay.

10 Q. I'm going to ask you a couple questions about it.

11 A. (Witness complies.)

12 Q. Have you ever seen that document before, the  
13 deposition notice?

14 A. This one?

15 Q. Yes.

16 A. No, sir.

17 Q. Did Mr. Hicks or any lawyer show that to you before  
18 today?

19 A. No, sir.

20 Q. Can you take a look at Page 4 for me?

21 A. Sure.

22 Q. Have you had a chance to look at the 19 categories of  
23 documents on Page 4?

24 A. No. I read the first page. Reading too fast for me.

25 Q. Just take a take a quick look. I'm not going to ask

1 you specific questions about each of those categories, but  
2 please just take a quick look through it.

3 A. (Witness complies.)

4 Q. Okay. Before I ask you about that document, when you  
5 did the research in the middle of 2002 on Seroquel, did you  
6 print out what you found on the internet?

7 A. No, sir.

8 Q. Having looked at what we refer to as Schedule A here  
9 on Pages 4 and 5 of Hernandez Exhibit 2, do you have any of  
10 these documents in your possession at home?

11 A. Yes.

12 Q. Okay. Let's just go through it. And if you don't  
13 mind, could you mark your copy with a check mark near the  
14 categories of information that you have at home?

15 A. Okay.

16 Q. All right. First, medical records from any  
17 physician, hospital, or health care provider over the last ten  
18 years prior to your first ingestion of Seroquel.

19 A. Yes.

20 Q. Do you have medical records at home?

21 A. Yes, sir.

22 Q. Approximately how many medical records do you have,  
23 in volume?

24 A. I have everything.

25 Q. You have a copy of every medical record --

1 A. Yes.

2 Q. -- you have?

3 A. Yes.

4 Q. And I know we've been using estimates of boxes  
5 earlier.

6 A. You don't want to know. My husband just doesn't know  
7 what to do with my stuff anymore.

8 Q. Can you give me a sense of the volume of medical  
9 records you have from doctors, hospitals, and health care  
10 providers?

11 A. I have one 9-gallon -- you know, what are those,  
12 totes that you use to store things?

13 MR. HICKS: Uh-huh.

14 A. One of those filled with medicals.

15 Q. (BY MR. BROWN) All right. So we can check off  
16 No. 1.

17 A. Yes, sir.

18 Q. Is -- how far back does that collection of medical  
19 records go?

20 A. Let's put it this way: I have x-rays in there from  
21 1987, '88. It goes back.

22 Q. To the -- so, you have medical records going back  
23 from your doctors and hospital visits to roughly the 1980s?

24 A. From today, uh-huh, to today.

25 Q. To today?

1 A. Yeah.

2 Q. And --

3 A. I'm sorry. I don't have my last hospitalization.  
4 That's the only thing I don't have.

5 Q. Was your last hospitalization 2007?

6 A. Six.

7 Q. 2006. And what were you hospitalized for in 2006?

8 A. Heart attack.

9 Q. Okay.

10 THE WITNESS: Can fairly say that, right?

11 MR. HICKS: Yeah. What -- what --

12 A. Heart attack.

13 Q. (BY MR. BROWN) Okay. And we'll come back and cover  
14 the heart attack a little bit later today. But the heart  
15 attack in 2006, those records aren't yet in the collection,  
16 correct?

17 A. No. It --

18 Q. Are you in the process of collecting those records as  
19 well?

20 A. Soon as I have the means, I will get my medical  
21 records, yes. Costs a little bit.

22 Q. Besides the heart attack in 2006, are there any other  
23 medical records from the mid to late 1980s that you don't think  
24 are in that collection of medical records?

25 A. No, sir. Everything's --

1 MR. HICKS: Objection. Speculation.

2 A. Everything's there. Trust me. Everything's there.

3 Q. (BY MR. BROWN) And let's look at Item No. 2.

4 A. Okay.

5 Q. Do you have pharmacy records for the ten years prior  
6 to your first ingestion of Seroquel to present?

7 A. Yes, sir.

8 MR. HICKS: Objection. Speculation. Vague.

9 A. Okay.

10 Q. (BY MR. BROWN) You've read Item No. 2 in Exhibit --  
11 Schedule A --

12 A. Yes.

13 Q. -- have you, Ms. Hernandez?

14 A. Yes, sir.

15 Q. Do you understand what that is -- that's asking for?

16 A. Yes, sir.

17 Q. I'm going to read it to you, "Pharmacy records for  
18 ten years prior to your first ingestion of Seroquel to present,  
19 including receipts" --

20 A. Yes.

21 Q. -- "prescriptions, or records of purchase."

22 Did I read that right?

23 A. Yes, sir. Yes, sir. Every single one, yes.

24 Q. Do you have that information at home?

25 A. Yes, sir.

1 Q. Where do you keep that information?

2 A. In -- in those jugs.

3 Q. Do you have a separate box or jug for the pharmacy  
4 records?

5 A. No. They're in there with the medical records.

6 Q. We can check that one off?

7 A. I did, sir.

8 Q. As you sit here today, can you think of any pharmacy  
9 record, prescription record that would not be in that  
10 collection?

11 MR. HICKS: Objection. Calls for speculation.

12 A. No.

13 Q. (BY MR. BROWN) So, as far as you know as you sit  
14 here today, the collection of pharmacy records that we  
15 discussed in Item No. 2 is complete?

16 A. Yes, sir.

17 Q. Look at Item No. 3, "Advertisements for Seroquel or  
18 articles discussing Seroquel which you reviewed before or  
19 during a time you took Seroquel."

20 Did I read that correctly, Item No. 3?

21 A. Yes, you read it correctly. I don't have  
22 advertisements, and I have an article because I still have  
23 pills. I saved the pills.

24 Q. Okay. Do you have the pills at home?

25 A. Yes, sir.



1 Q. So, let me see if I can help clear up some of this.  
2 When we were discussing Item No. 3 on Schedule A, you indicated  
3 that you have at home a sample of Seroquel, correct?

4 A. Uh-huh.

5 Q. And how many pills were in the sample of Seroquel  
6 that you have at home?

7 A. The -- the ones remaining is the question? I would  
8 say I have four pills.

9 Q. And how many were in that particular sample that have  
10 four pills remaining?

11 MR. HICKS: I'm sorry. Objection. Vague. It's  
12 confusing.

13 Q. (BY MR. BROWN) Let me rephrase the question to clear  
14 it up. This sample package that you have at home, how many  
15 total pills came in that package before you used any?

16 A. It's still vague because -- because the question that  
17 I wanted to answer you is how many the doctor gave me from --  
18 from the beginning. She gave me the two boxes, but she took  
19 all the other ones from the other boxes and stuffed them in  
20 those two boxes so I wouldn't carry everything. So, every  
21 blister pack might have had a dozen on them.

22 Q. Okay. Look at Item No. 4.

23 A. Sure. Oh, I'm --

24 Q. Okay. The packaging, including the box and label,  
25 for Seroquel and any remaining indication. That's what we're

1 talking about now, right?

2 A. Remaining medication?

3 Q. Yes.

4 A. Yes, sir.

5 Q. Let's check that -- can we check that one off?

6 A. Sure.

7 Q. And before we do -- we're going to come back and  
8 discuss the samples in detail -- do you remember what the  
9 sample packages looked like?

10 A. I remember it having blue on it. That's -- that's --  
11 you mean the box?

12 Q. Yes.

13 A. The pills were sort of, like, pink salmon color, but  
14 the packaging had some blue on it. I remember that. I didn't  
15 keep the box. I just kept the blister packs.

16 Q. Okay. After you used the Seroquel samples, did you  
17 keep the empty blister packs?

18 A. No, sir. I kept the full blister packs.

19 Q. Do your logs reveal how many Seroquel pills you took?

20 A. In total?

21 Q. Yes.

22 A. If I were to -- to look through them, I would say so.

23 Q. So, I could -- if you produce to your lawyers and  
24 your lawyers gave to me the logs, I could add up every time you  
25 took a Seroquel pill?

1 A. Yes.

2 MR. BROWN: And before we go through this  
3 exercise, I'm going to just put a statement on the record.  
4 We're going to request production of the box of medical records  
5 and pharmacy records that Ms. Hernandez spoke about, as well as  
6 the article she mentioned she kept, as well as the -- the  
7 packaging for the remaining samples, a color photograph of  
8 that.

9 MR. HICKS: Okay.

10 MR. BROWN: Okay. And we would like to inspect  
11 the sample in -- at some point.

12 MR. HICKS: Yeah, yeah, subject to objections  
13 for scope or any of that, sure enough.

14 Q. (BY MR. BROWN) Look at Item No. 5.

15 A. Okay.

16 Q. "Product use instructions, product warnings, package  
17 inserts, pharmacy handouts, or other materials distributed to  
18 you or provided to you in connection with the use of Seroquel."

19 Did I read Item No. 5 correctly?

20 A. Yes, you did, sir.

21 Q. And do you have any information?

22 A. No, sir.

23 Q. Okay. So that's going to be "no." Why don't you  
24 write "no" next to that.

25 A. And how about No. 3? It stays blank or just

1 "any of the defendants," in this case, AstraZeneca.

2 Do you have any documents that are AstraZeneca  
3 documents?

4 A. No, sir.

5 Q. Did you ever -- did you ever write to or communicate  
6 with AstraZeneca?

7 A. No, sir.

8 Q. Do you have any documents/communications at home?

9 A. No, sir.

10 Q. Okay. If the answer to No. 9 is no, write "no."

11 A. (Witness complies.)

12 Q. Have you ever done any research on any other  
13 antipsychotic medications?

14 A. Yes, sir.

15 Q. What other antipsychotic medications have you  
16 researched or looked at?

17 A. Tricyclics. Those are the ones that work for me.

18 Q. Do you have any particular names of tricyclics?

19 A. I've checked on Paxil, I've checked on Effexor, I've  
20 checked on amitriptyline, and the list goes on and on.

21 Q. Do you have -- do you maintain records of the results  
22 of your research?

23 A. Yes, sir.

24 Q. And do you have that at home?

25 A. It could be -- that could be on my computer.

1 Q. Okay.

2 MR. BROWN: And we're going to make a request  
3 for production of the material that she researched on  
4 tricyclics.

5 MR. HICKS: Okay.

6 Q. (BY MR. BROWN) Look at Item No. 11, "Photographs,  
7 drawings" --

8 A. Okay. So, what am I doing --

9 MR. HICKS: Just --

10 Q. (BY MR. BROWN) Oh, I'm sorry. You have -- the  
11 answer to that question is, yes, you have this material at  
12 home?

13 A. The answer was possibly on my computer at home.

14 Q. Okay. So, can we write down "possibly on computer"?

15 A. Yes.

16 Q. Would that be accurate?

17 A. That would be accurate.

18 Q. Okay. All right. Look at Item No. 11, "Photographs,  
19 drawings, journals, slides, videos, DVDs, or any other media  
20 training related to your alleged injury or life after the  
21 incident."

22 Do you understand that question?

23 A. Yes. No.

24 Q. It's "no"? Okay. You indicate that you haven't  
25 worked since roughly 2001, correct?

1 (Discussion off the record at 10:55 a.m.)

2 Q. (BY MR. BROWN) So, with respect to Item No. 12, your  
3 tax returns, do you have your tax returns for the last five  
4 years at home?

5 A. No, sir. Four years.

6 Q. So, that's when you filed jointly with your husband;  
7 is that correct?

8 A. Yeah. I didn't file before.

9 Q. And we're going to make a request for production of  
10 the four years of tax returns that you have.

11 A. Okay.

12 Q. So, can you put down next to No. 12 "four years"? Is  
13 that right?

14 A. Yes, sir.

15 Q. And that's accurate, correct?

16 A. Yes.

17 MR. HICKS: And just note that there was not  
18 affirmative response on what -- the claim regarding loss of  
19 earnings or earnings capacity is, but she has noted the tax  
20 returns are there, so -- just want to be clear.

21 A. Yes. It would be three years, right? Because I've  
22 been married four, so it would be three years of taxes. And  
23 this year running would be the fourth year, so -- right?

24 Q. (BY MR. BROWN) Okay. Let me clarify this.

25 A. Do I write "three" or "four"?

1 Q. So, with respect to No. 12, you don't have five years  
2 of tax returns, you have three years; is that correct?

3 A. Yes.

4 Q. Prior to when you filed jointly with your husband,  
5 did you file tax returns on your own?

6 A. Maybe twice before.

7 Q. When was the last time you filed a tax return on your  
8 own?

9 A. 1994.

10 Q. Okay.

11 (Sotto voce discussion.)

12 A. I don't know.

13 Q. (BY MR. BROWN) I know you've told me -- strike that.

14 Look at Item No. 13, "If you claim to have  
15 suffered a loss of earnings or earnings capacity, all  
16 employment records in your possession, including employment  
17 applications, performance evaluations, paychecks, and pay  
18 stubs."

19 Do you have -- did I read that correctly?

20 A. Yeah, you read it correctly.

21 Q. Do you have --

22 A. I don't understand it though. "If you have" -- no.

23 Q. Okay.

24 A. No, I don't have that.

25 Q. Okay. If the answer's "no," let's put that next to

1 Q. (BY MR. BROWN) Let's go back to Item No. 13. Did  
2 you understand what you read in Item No. 13 of Hernandez  
3 Exhibit No. 2?

4 A. Yes.

5 Q. And do you have any of that information described in  
6 Item No. 13?

7 A. I understand them, but I don't have them.

8 Q. Okay. If the answer's "no," why don't we write down  
9 "no" next to No. 13.

10 A. Okay.

11 Q. And No. 14 refers to if you have a claim -- if you  
12 claim any loss from medical expenses, we want copies of all  
13 bills from any physician, hospital, pharmacy, or health care  
14 provider. Did I read that correctly?

15 A. Yes, you did.

16 Q. And, Ms. Hernandez, are you asserting a claim for out  
17 of pocket medical expenses in this case?

18 A. Yes, sir.

19 Q. And do you know how much that is?

20 A. No, sir.

21 Q. Do you have the information referenced in Item No.  
22 14, the bills?

23 A. Yes, sir.

24 Q. And can you put -- if the answer's a "yes," can you  
25 write a "yes" next to 14?



1           A.   (Witness complies.)

2                       MR. BROWN:  And we're going to make a request to  
3  counsel for all of the information identified in the -- in  
4  Ms. Hernandez' possession in Item No. 14.

5                       MR. HICKS:  Uh-huh.

6           Q.   (BY MR. BROWN)  Ms. Hernandez, the bills from the  
7  hospitals, the pharmacy, and health care providers, is that in  
8  the same box as all the medical records and pharmacy records?

9           A.   Yes.

10          Q.   Okay.  Item No. 15, if you have been the claimant or  
11  subject of any Workers' Compensation, Social Security, or other  
12  disability proceeding, all documents relating to such  
13  proceeding.  Did I read that correctly?

14          A.   Yes, sir.

15          Q.   You have filed a Workers' Compensation claim, haven't  
16  you?

17          A.   Yes, sir.

18          Q.   And have you also filed a claim with Social Security?

19          A.   Yes, sir.

20          Q.   Do you have records from those two cases?

21          A.   Yes, sir.

22          Q.   And where do you keep those records?

23          A.   Those are all the logs I've been keeping.

24          Q.   And do you have -- so, you have documents responsive  
25  to Item 15?

1 A. All of those, uh-huh.

2 Q. Can you put a "yes" next to Item 15?

3 A. Yes.

4 MR. BROWN: And we're going to call for  
5 production of all the documents that Ms. Hernandez just said  
6 that she has at home.

7 Q. (BY MR. BROWN) Is that right?

8 A. Yes, sir.

9 MR. HICKS: I'm going to object that it assumes  
10 facts not in evidence. She's talking about journals, that she  
11 kept some of these items in her journal. So, I don't know if  
12 that's a journal entry or these are separate documents.

13 MR. BROWN: Yeah. Let me clean that up.

14 Q. (BY MR. BROWN) In Item No. 15, we talked about all  
15 the documents related to your Workers' Compensation and Social  
16 Security actions?

17 A. All of it has become -- as it will with you, all of  
18 it has become part of the case. All of my journals, any  
19 intimate thing that I have written, have become part of this  
20 Social Security, so --

21 Q. So I'm clear, the items that you described in 15, the  
22 Workers' Compensation and Social Security information, that  
23 information is recorded in your journals, correct?

24 A. Yes. You're talking about journals now? Because  
25 we're talking about the big tote. Or are we talking about

1           A.    I mean, if you give me everyday words for what's in  
2 here, maybe I can answer.

3           Q.    Do you have -- in addition to your Workman's Comp  
4 case --

5           A.    Uh-huh.

6           Q.    -- and your Social Security case -- and we'll talk a  
7 little bit about that later on -- you were also involved in a  
8 couple of civil lawsuits; is that correct?

9           A.    Those are all over a long time ago.

10          Q.    But you were involved in some civil litigation.

11          A.    Yes, sir.

12          Q.    And you filed lawsuits in those cases, correct?

13          A.    Yes, sir.

14          Q.    Do you keep all of --

15          A.    Yes, sir.

16          Q.    You have binders for each of those car accidents?

17          A.    Yes, everything.

18                   MR. HICKS:  Just let him finish his question so  
19 she can type.

20                   THE WITNESS:  Oh.

21                   MR. HICKS:  That's fine.

22          Q.    (BY MR. BROWN)  So, you have -- you have binders of  
23 materials --

24          A.    Yes.

25          Q.    -- for --

1           A.    I have a 1990 folder for -- oh, I'm sorry.

2           Q.    Okay.  I want to -- the court reporter has a hard  
3 time keeping track of both of us.  So, you have binders for  
4 both of the lawsuits that stemmed from accidents; is that  
5 correct?

6           A.    Yes.  Yeah.  I -- I keep everything.

7                   MR. BROWN:  And we're going to call for  
8 production of the binders for the accidents or any other civil  
9 litigation.

10                   MR. HICKS:  Uh-huh.

11           Q.    (BY MR. BROWN)  Seventeen, "Journals, diaries, notes,  
12 letters" --

13           A.    What am I putting there?

14           Q.    Oh, for 16?  You -- do you understand what 16 means?

15           A.    No.

16           Q.    All right.  We've established you have a lot of  
17 materials.

18           A.    I've asked you to clarify it.

19           Q.    But why don't you put a question mark next to that if  
20 you don't understand the question, because that's probably  
21 accurate.  Is that right?

22                   MR. HICKS:  Or just -- if you don't know --

23           A.    You're asking me if I have stuff, but I don't know  
24 what the stuff means.  Is that a fair question?

25                   MR. HICKS:  I'm going to ask you not to mark 16