

Exhibit A

CORNELL•CATANA REPORTING SERVICES, 116 Lisgar St., Suite 714, Ottawa, ON, K2P 1K2
Tel: (613) 231-4664 Fax: (613) 231-2665

Examination No. 94-1554

Court File No. CVS-95-279HDM(RJJ)

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA

MILDRED MERLIN and DAN
MERLIN,

Plaintiffs,

vs.

DOWN CORNING WRIGHT, a wholly
owned subsidiary of DOW
CORNING CORPORATION, THE DOW
CHEMICAL COMPANY, McGHAN
MEDICAL CORPORATION, INAMED
CORPORATION and MINNESOTA
MINING AND MANUFACTURING
COMPANY/3M

Defendants.

Civil No.
CVS-95-279HDM (RJJ)

DEPOSITION OF:
PIERRE BLAIS

BE IT REMEMBERED THAT ON THE 23RD DAY
OF JUNE, 1995, THE DEPOSITION OF PIERRE BLAIS
WAS TAKEN PURSUANT TO NOTICE, COMMENCING AT
9:15 A.M. OF SAID DAY AT THE OFFICES OF
BLAKE, CASSELS & GRAYDON, 45 O'CONNOR ST.,
20TH FL., OTTAWA, ONTARIO K1P 1A4 CANADA

CORNELL•CATANA REPORTING SERVICES. 116 Lisgar St., Suite 714, Ottawa, ON, K2P 0C2
Tel: (613) 231-4664 Fax: (613) 231-4605

27

1 A. That is correct. It was at any rate the
2 second degree aspect of my testimony.

3 108. Q. The primary aspect being the forensic
4 analysis of the implants themselves?

5 A. Correct.

6 109. Q. And the pathologists, the same pathologist in
7 both Johnson and Stabile?

8 A. No. I believe the two cases made use of
9 testimonies from at least three pathologists, not the
10 same for -- there was no overlap.

11 110. Q. Doctor, finishing up your background and
12 experience, I gather from your resume that you were a
13 Research Associate after you finished your Postdoctoral
14 Fellowship for about eight years?

15 A. That is correct.

16 111. Q. You then worked for the Canadian government
17 for approximately 13 years until 1989?

18 A. That is not quite correct. My employment as
19 a Research Associate at the National Research Council of
20 Canada would be deemed to be a government employment.
21 Therefore, the statement would be more closely that I
22 have worked for Canadian government related organizations
23 in the same field for about 21 years.

24 112. Q. From 1968 to 1989?

25 A. Correct.

CORNELL • CATANA REPORTING SERVICES, 116 Lisgar St., Suite 714, Ottawa, ON, K2P 0C2
Tel: (613) 231-4664 Fax: (613) 231-4605

28

1 113. Q. But beginning in 1976 you became a Senior
2 Scientific Advisor for the Canadian National Department
3 of Health and Welfare?

4 A. That's not correct. I was employed or rather
5 my formal attachment changed from the National Research
6 Council to the Department of the then National Health and
7 Welfare. I did not become a Senior Scientific Advisor to
8 National Health and Welfare until I believe it was '81 or
9 '82.

10 114. Q. Prior to that you were a Research Associate
11 in that Department?

12 A. That is correct. There is a continuum
13 between my employment in the National Research Council
14 and the Department of National Health and Welfare. It
15 was simply a change in the administration of my pension
16 plan and reimbursements.

17 115. Q. At some point in 1989 your employment with
18 the National Health and Welfare Department was
19 terminated; is that right?

20 A. That is correct.

21 116. Q. When did that occur?

22 A. It occurred when I resigned in 1989, I
23 believe it was December.

24 117. Q. Prior to that time had you been terminated
25 and then later reinstated?