

## **EXHIBIT D**

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

VIETNAM VETERANS OF AMERICA, )  
et al, )  
 )  
Plaintiffs, )  
 )  
v. )  
 )  
CENTRAL INTELLIGENCE )  
AGENCY, et al, )  
 )  
Defendants. )  
\_\_\_\_\_ )

CERTIFIED  
COPY

No. CV 09-0037-CW

CONFIDENTIAL

VIDEOTAPED DEPOSITION OF JAMES S. KETCHUM, M.D.  
Wednesday, July 14, 2010

THE SOUZA GROUP  
Certified Shorthand Reporters  
4615 First Street, Suite 200  
Pleasanton, California 94566

Reported by:  
KARLA MARTIN, CSR  
LICENSE NO. 12025  
Videographer: Aline Mayer

1 Q. When you left Edgewood did you take any  
2 material with you?

3 A. Yes, I took personal notes and copies of  
4 reports that I had.

5 Q. Did you also take some video with you?

6 A. I don't think so.

7 Q. Did you take still pictures?

8 A. Yes.

9 Q. And did you have permission to take any of that  
10 material?

11 A. No.

12 Q. Were you later criticized for having taken the  
13 material?

14 A. No.

15 Q. How did you get all that material out of  
16 Edgewood?

17 A. Boxes.

18 Q. There was no screening procedure?

19 A. No.

20 Q. Has anybody ever asked for it back?

21 A. No.

22 Q. Did you also take notes of taken currently with  
23 the conduct of the tests at Edgewood, experiments?

24 A. Yes, I did when I had them.

25 Q. And they had the actual names of the

1 participants on them?

2 A. In some of them, yes.

3 Q. Did there come a time where a news agency  
4 sought copies of some of the photographs that you had or  
5 video?

6 A. News agency?

7 Q. Yes.

8 A. Are you referring to newspapers?

9 Q. Any media.

10 A. Yes, several magazines and some newspapers  
11 wanted to include photographs for my book and I usually  
12 supplied them.

13 Q. Do you recall -- let me back you up. Isn't it  
14 a fact that you do have some video taken at Edgewood?

15 A. Yes, I have since acquired some.

16 Q. And did one of the news agencies ask for copies  
17 of the video that you have?

18 A. Yes.

19 Q. And did you refuse to provide it?

20 A. No.

21 Q. Do you recall stating that you did not want to  
22 provide a full set of your video because you could sell  
23 it for up to \$100 a minute for novel footage?

24 A. I don't recall saying that.

25 Q. Did you think that?

1 SUPERIOR COURT OF CALIFORNIA)  
2 : ss  
3 COUNTY OF CONTRA COSTA )  
4

5 I, KARLA MARTIN, a Certified Shorthand  
6 Reporter of the State of California, do hereby certify:

7 That the foregoing proceedings were taken  
8 before me at the time and place herein set forth; that  
9 any witnesses in the foregoing proceedings, prior to  
10 testifying, were placed under oath; that a verbatim  
11 record of the proceedings was made by me using machine  
12 shorthand which was thereafter transcribed under my  
13 direction; further, that the foregoing is an accurate  
14 transcription thereof.

15 I further certify that I am neither  
16 financially interested in the action nor a relative or  
17 employee of any attorney or any of the parties.

18 IN WITNESS WHEREOF, I have this date  
19 subscribed my name.

20 **AUG 04 2010**

21 Dated: \_\_\_\_\_

22   
23 \_\_\_\_\_  
24 KARLA MARTIN, RPR  
25 CSR NO. 12025