

EXHIBIT 83

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IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

VIETNAM VETERANS OF AMERICA, et al.,
Plaintiffs,

vs. Case No. CV 09-0037-CW

CENTRAL INTELLIGENCE AGENCY, et al.,
Defendants.

Videotaped Deposition of
WILLIAM MCKIM
CONFIDENTIAL SUBJECT TO PROTECTIVE ORDER
NOVEMBER 18, 2011
8:00 a.m.
Taken at:
Wiles, Boyle, Burkholder
300 Spruce Street
Columbus, Ohio
Todd L. Persson, Notary Public

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1 "Manpower"?

2 A. Yes.

3 Q. What --

4 A. It's a temp agency.

5 Q. It's a temp agency? And is that 08:09:35
6 the full name, or what is it?

7 A. Manpower, Incorporated. I think
8 that's the full name of it.

9 Q. So you were a temp working for them
10 but then doing things for Battelle? 08:09:46

11 A. Yeah. It's a temp agency. I was
12 working for Battelle through the temp agency.

13 Q. Okay. And what was your job title
14 and role at that point?

15 A. Title, I don't recall. I believe 08:09:57
16 the Manpower title, I think, to the best of my
17 knowledge, was called researcher. And the role
18 was doing data -- the same things kind of what
19 a data entry person would do when this --

20 because I came in working in on the CBAIMS and 08:10:11
21 CB Test Repository tasks. And I was doing
22 literature searches, data developments review,
23 data extraction, QA/QC, those kind of details.

24 Q. What is CBAIMS?

25 A. CBAIMS is the Chemical and 08:10:23

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1 Biological Archive Information Management
2 System that's -- right now the current test
3 that we have has CBAIMS and CB test efforts by
4 the same client under one task. That task
5 involved -- a little bit different than the CB 08:10:35
6 Test Repository. The CBAIMS involved looking
7 for all scientific chemical and biological
8 data. We go into different various sites,
9 bring the data back and populate the CBRNIAC
10 Repository. 08:10:48

11 Q. And what's the CBRNIAC Repository?

12 A. The CBRNIAC is the Chemical and
13 Biological and Radiological and Nuclear
14 Information Analysis Center. That -- and their
15 database -- and that CBRNIAC has been run for 08:10:58
16 several years by Battelle. That database
17 houses all kinds of chem/bio. At the time when
18 I first came in it was called CBIAC, it left
19 off the "R" and "N", and it was only doing
20 chem/bio data. Now it does radiological and
21 nuclear as well.

22 Q. That's impressive with the
23 acronyms. That's good.

24 So when you went on full-time in
25 May 2005, what was your role? 08:11:21

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1 got the CBAIMS data and he got the CB Test
2 Repository data, if I'm interpreting your
3 question correctly.

4 MR. BOWEN: So one follow-up so
5 that I understand.

15:34:08

6 EXAMINATION OF WILLIAM MCKIM

7 BY MR. BOWEN:

8 Q. And I apologize for using the term
9 "extracting" in a way that may have been
10 confusing. So the CBAIMS information lands in
11 the CBAIMS database; is that correct, or the
12 CBRNIAC?

15:34:13

13 A. The CBRNIAC repository.

14 Q. And CBRNIAC is available to the
15 Department of Defense?

15:34:23

16 A. Yes. It's available to the CBD
17 community.

18 Q. Within the Department of Defense?

19 A. Yes.

20 Q. And the CB Test Repository Program
21 is available to the Department of Defense?

15:34:30

22 A. Yes.

23 MR. BOWEN: No further questions.

24 We consider this deposition to be closed. We

25 disagree with the Plaintiffs' characterization

15:34:39

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1 REPORTER'S CERTIFICATE

2 The State of Ohio,)

3 SS:

4 County of Cuyahoga.)

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6 I, Todd L. Persson, a Notary Public
7 within and for the State of Ohio, duly
8 commissioned and qualified, do hereby certify
9 that the within named witness, WILLIAM MCKIM,
10 was by me first duly sworn to testify the
11 truth, the whole truth and nothing but the
12 truth in the cause aforesaid; that the
13 testimony then given by the above-referenced
14 witness was by me reduced to stenotypy in the
15 presence of said witness; afterwards
16 transcribed, and that the foregoing is a true
17 and correct transcription of the testimony so
18 given by the above-referenced witness.

19 I do further certify that this
20 deposition was taken at the time and place in
21 the foregoing caption specified and was
22 completed without adjournment.

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1 I do further certify that I am not
2 a relative, counsel or attorney for either
3 party, or otherwise interested in the event of
4 this action.

5 IN WITNESS WHEREOF, I have hereunto
6 set my hand and affixed my seal of office at
7 Cleveland, Ohio, on this 7th day of
8 December, 2011.

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Todd L. Persson, Notary Public
within and for the State of Ohio

My commission expires July 28, 2012.