

Exhibit O

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

VIETNAM VETERANS OF :
AMERICA, et al., :
Plaintiffs :
vs : CIVIL ACTION NUMBER
CENTRAL INTELLIGENCE :
AGENCY, et al., : CV 09-0037-CW
Defendants :

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Videotaped Deposition of KENNETH CRAIG
HYAMS, M.D., taken at 2000 Pennsylvania
Avenue, N.W., Suite 6000, Washington, D.C.,
commencing at 9:04 a.m., Friday, January 13,
2012, before Lisa V. Feissner, RDR, CRR,
CLR, Registered Diplomate Reporter and
Notary Public.

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1 was helpful for both Departments. 09:23:04

2 Q. Do you -- did the Deployment Health 09:23:07

3 Working Group take on joint projects related to 09:23:11

4 outreach to certain cohorts of veterans? 09:23:15

5 A. I don't remember us ever doing that. 09:23:17

6 It was more general. But certainly the members of 09:23:19

7 the two groups would sometimes deal in specific 09:23:21

8 projects. But it was generally not done as part of 09:23:25

9 the Deployment Health Work Group meetings. 09:23:27

10 Q. And what was it done as part of? 09:23:29

11 A. Just collaboration with DoD. I mean... 09:23:31

12 Q. Separate from the Deployment Health 09:23:36

13 Working Group, do you recall collaborating with the 09:23:38

14 DoD regarding any outreach efforts to any specific 09:23:40

15 groups of veterans? 09:23:42

16 A. I don't -- I'd have to think about that 09:23:45

17 a minute because there are so many of these things. 09:23:48

18 I think we did some sort of outreach to SHAD 09:23:50

19 veterans, but I'm not -- I don't remember entirely. 09:23:54

20 I mean, we did a lot of this sort of outreach, so 09:24:00

21 it's hard to remember specific instances. 09:24:03

22 Q. So you have no recollection of any 09:24:09

23 details about the Edgewood Arsenal chemical agent 09:24:16

24 exposure studies from 1955 to 1975? 09:24:20

25 A. About the studies themselves and what 09:24:23

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1 was done at Edgewood at the time? No, I don't 09:24:26
2 remember anything right now. 09:24:29

3 Q. And you have no recollection of being 09:24:31
4 involved with any outreach or notification effort 09:24:33
5 to veterans? 09:24:37

6 A. I remember being involved with the 09:24:38
7 issue. I don't remember any of the specifics. 09:24:39
8 Edgewood was something that crossed my desk as part 09:24:41
9 of my duties, and so we certainly handled it. I 09:24:44
10 remember that this issue was there. I just don't 09:24:47
11 remember the specifics about it. 09:24:49

12 Q. What do you remember? 09:24:51

13 A. No -- 09:24:53

14 MS. FAREL: Objection, vague. 09:24:53

15 BY MS. SPRENKEL: 09:24:55

16 Q. What do you remember about your 09:24:55
17 involvement with outreach efforts to veterans that 09:24:56
18 experienced chemical agent exposures at Edgewood 09:25:01
19 Arsenal? 09:25:04

20 A. I don't remember anything about the 09:25:04
21 outreach efforts per se. I remember making the 09:25:06
22 case for the health care exam for these veterans. 09:25:09
23 That's about the main thing I remember. It sticks 09:25:12
24 in my mind that I was -- that I -- I mean, that's 09:25:15
25 a -- you know, that's a routine thing for my office 09:25:20

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I declare under penalty of perjury
under the laws that the foregoing is
true and correct.

Executed on _____, 20____,
at _____, _____.

KENNETH CRAIG HYAMS, M.D.

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C E R T I F I C A T E

I, Lisa V. Feissner, RDR, CRR, CLR,
Registered Diplomate Reporter and Notary Public in
and for the Commonwealth of Pennsylvania, certify
that the foregoing is a true and accurate
transcript of the deposition of said witness, who
was first duly sworn on the date and place
hereinbefore set forth.

I further certify that I am neither
attorney nor counsel for, nor related to or
employed by, any of the parties to the action in
which this deposition was taken, and further, that
I am not a relative or employee of any attorney or
counsel employed in this action, nor am I
financially interested in this case.

Lisa V. Feissner, RDR, CRR, CLR
Notary Public