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IN THE UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

IN RE:  
Methyl Tertiary Butyl Ether ("MTBE")  
Products Liability  
Litigation

This document relates to:  
County of Suffolk and  
Suffolk County Water Authority  
v. Amerada Hess Corp. et al.  
United Water New York v.  
Amerada Hess Corp., et al.

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Friday, June 27, 2008  
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Videotaped Deposition of  
FIORELLA BELPOGGI, Volume 2, held in the law offices  
of Sheppard Mullin Richert & Hampton, beginning at  
9:14 a.m., before Sandra Bunch VanderPol, RPR, RMR,  
CRR, CSR #3032  
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14 lymphomas that you found?

15 A. No.

16 Q. That's the percentage of lymphomas  
17 associated with inflammation that you found in the  
18 entire rat population -- in the entire female rat  
19 population?

20 A. Yes.

21 Q. Okay. We talked a little bit  
22 yesterday about your job duties with respect to  
23 managing the colony of rats, and now mice, at the  
24 Ramazzini Foundation; do you recall that?

25 A. Yes.

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1 Q. Where is that colony?

2 A. Where is? At the castle in

3 Bentivoglio in our laboratory.

4 Q. And there is a -- there's a breeding  
5 colony there, correct?

6 A. Yes.

7 Q. And how are the animals transported  
8 from that to the laboratory? Is it all one building?

9 A. There is a corridor.

10 Q. So it's all the same building?

11 A. Yes.

12 Q. And what do you monitor -- well, do  
13 you monitor the breeding colony, the colony, for  
14 infectious diseases?

15 A. Yesterday I already talked about the  
16 periodic visits by the veterinarian. According to  
17 law No. 116 of 1994, the veterinarians follow all  
18 the issues regarding the health of the animals, the  
19 animal care, including those of the breeding colony.

20 Q. And do you depend on those  
21 veterinarians to investigate whether or not diseases  
22 are present in the colony?

23 A. The veterinarian is the director of  
24 the Zooprofilattico Institute of the Emilia Romagna  
25 region. He's the person who decides the tests will

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1 be performed, all the tests that are needed to  
2 observe how animals' health is doing.

3 Q. And he makes those decisions in terms  
4 of the tests; you do not, correct?

5 A. Yes.

6 Q. Okay.

7 A. There is an annual screening for a  
8 series of bacteria and other parasites. There is an  
9 annual screening. And then in the other visit he  
10 decides just if he found the need.

11 Q. And do you know what bacteria are  
12 screened for?

13 A. Oh, the most common.

14 Pasteurella, mycoplasma, some other virus that I am  
15 not -- present at the moment, but I know that these  
16 two are surely present.

17 Q. What about Sendai, do you know  
18 about --

19 A. Sendai, a virus he does.

20 Q. And have you ever found mycoplasma or  
21 mycoplasmosis?

22 A. The presence of mycoplasma was never  
23 found. Sometime we have found the response, so this  
24 means that there were antibodies against, but not the

25 infection.

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1 Q. And what did you do when you found  
2 the antibodies against the mycoplasma?

3 A. We have a sanitary program that I  
4 don't follow directly, and I can't tell you exactly  
5 what is the drug or what is -- but I know that once  
6 we have it, as I repeat, we have never found a  
7 positive response to mycoplasma, but we did find the  
8 antibody.

9 Like with tuberculosis, we all, most  
10 everybody, is positive to the antibodies, but nobody  
11 has -- is ill with the illness. That happens also in  
12 animals. They sometimes have the antibodies, but  
13 they did not have the infection.

14 Q. And at that point, when you  
15 discovered the antibodies from mycoplasmosis, did you  
16 sacrifice any animals?

17 A. It is not necessary.

18 Q. Okay.

19 A. You can have antibody for  
20 tuberculosis and don't need to have any care about.

21 Q. Right. So you did not sacrifice any  
22 animals?

23 A. No. We have not had never the need  
24 to sacrifice for an epidemic.

25 Q. And, again, all of this screening is

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1 done by the director you mentioned, correct?

2 A. Yes.

3 Q. You don't do that?

4 A. No.

5 Q. Okay. We talked a little bit  
6 yesterday about historical controls. And this may be  
7 related. But let me just ask it.

8 I think you talked about you had background  
9 information on incidence of all sorts of tumors --

10 A. Yes.

11 Q. -- in your colony.

12 You have -- is it correct that you have  
13 documents on the background incidence of  
14 lymphoblastic lymphoma in the rat colony?

15 A. Yes.

16 Q. You would have. And the same is true  
17 for lymphocytic leukemia?

18 A. For all kind.

19 Q. For all kinds. The same is true for  
20 immunoblastic lymphoma?

21 A. Yes.

22 Q. You have that data for the control  
23 animals?

24 A. Yes.

25 Q. Do you know if that -- if the

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1 background incidence of those diseases has changed  
2 over time?

3 A. They have not changed.

4 Q. They have not. And if -- what  
5 records do you have where we could check that?

6 A. I'm not sure I understood. What  
7 records I have where you could check?

8 Q. If -- not you. If Fiorella Belpoggi  
9 would like to check the background incidence, where