

**Testimony of B. Braun's Chief  
Executive Officer, Carroll  
Neubauer, confirming that  
B. Braun did not consider the  
residents living near the facility  
while the plant was emitting  
dangerous ethylene oxide.**

**In the Matter Of:**

*CHRISTOPHER GLASS and EMILY GLASS vs*

*B. BRAUN MEDICAL, INC.*

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*CAROLL NEUBAUER*

*February 01, 2022*

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COURT OF COMMON PLEAS  
PHILADELPHIA COUNTY, PENNSYLVANIA

CHRISTOPHER GLASS and EMILY GLASS,

Plaintiffs,

Case No. 210500315

vs.

B. BRAUN MEDICAL, INC. et al.,

Defendants.

VIDEOTAPED DEPOSITION OF CAROLL NEUBAUER

HELD REMOTELY VIA ZOOM VIDEOCONFERENCE

February 1, 2022

10:11 a.m.

Reported By:  
Cheryll Kerr, CSR  
Job No. 2022-829321

COURT OF COMMON PLEAS  
PHILADELPHIA COUNTY, PENNSYLVANIA

-----x

CHRISTOPHER GLASS and EMILY GLASS,

Plaintiffs, Case No. 210500315

vs.

B. BRAUN MEDICAL, INC. et al.,

Defendants.

-----x

VIDEOTAPED DEPOSITION OF CAROLL NEUBAUER, held  
remotely via Zoom Videoconference, before Cheryll Kerr,  
CSR, a Certified Shorthand Reporter and a Notary Public,  
on February 1, 2022, at 10:11 a.m.

1 APPEARANCES:

2 COUNSEL FOR PLAINTIFFS:

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19 Also Present:

20 Jennifer Prioleau, Esq., in-house counsel for B. Braun  
21 Medical, Inc.; Scott Perleau, Videographer

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1 THE WITNESS: As it says here, people who  
2 live near facilities.

3 BY MR. BOSWORTH:

4 Q. Okay, and when did you first consider the  
5 possibility that people who live near facilities may be  
6 exposed to ethylene oxide that's released from a  
7 facility that uses ethylene oxide?

8 MS. ADAMS: Same objections.

9 THE WITNESS: Could you repeat that  
10 question?

11 BY MR. BOSWORTH:

12 Q. Before today, did you ever consider that  
13 people who live near facilities that release ethylene  
14 oxide in the air may be exposed to that ethylene oxide?

15 MS. ADAMS: Same objections.

16 THE WITNESS: I have considered that  
17 before today.

18 BY MR. BOSWORTH:

19 Q. When was the first time that you considered  
20 that?

21 A. I learned in 2016 of the EPA  
22 reclassification.

23 Q. What reclassification was that?

24 A. From possible carcinogenic to carcinogenic.

25 Q. Who told you about that reclassification?

1           A.       That was a discussion with general counsel  
2 and assistant general counsel of B. Braun.

3                   MS. ADAMS: Mr. Neubauer, just caution  
4 you not to reveal the content of any  
5 attorney-client communications.

6                   THE WITNESS: Which would mean?

7                   MS. ADAMS: Don't -- if he asks you what  
8 was said, then make sure you give me a chance  
9 to object to see if that's an okay question or  
10 it's going to reveal privilege.

11                  THE WITNESS: Very well.

12 BY MR. BOSWORTH:

13           Q.       Can you give me the names of those people,  
14 please?

15           A.       That would be Cathy Codrea, general counsel  
16 of B. Braun Medical, Inc., and Bill McKnight.

17           Q.       Okay.

18           A.       That would be assistant general counsel of B.  
19 Braun Medical, Inc.

20           Q.       Okay. Prior to 2016, did you ever consider  
21 that people who live near facilities that release  
22 ethylene oxide may be exposed to that chemical?

23           A.       No.

24                   MS. ADAMS: Objection, outside the scope.

25                   THE WITNESS: No.