Testimony of B. Braun's Environmental, Health Safety and Security Manager, Eric Geder, confirming that B. Braun emitted tons of ethylene oxide after learning it was a human carcinogen.

In the Matter Of:

GLASS vs

B. BRAUN MEDICAL, INC

ERIC GEDER

January 13, 2022



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1	IN THE COURT OF COMMON PLEAS PHILADELPHIA COUNTY, PENNSYLVANIA	
2		
3	CHRISTOPHER : GLASS and EMILY : GLASS, :	
4	Plaintiffs, : vs. :	
5	B. BRAUN :	
6	<pre>MEDICAL, INC., : et al. : Defendant. : NO. 00315</pre>	
7	Delendant NO. 00315	
8		
9	WITNESS: ERIC GEDER	
10		
11	January 13, 2022	
12		
13	Zoom deposition taken pursuant to	
14	notice, beginning at approximately 9:05 a.m.,	
15	before Kathryn Rose, Court Reporter-Notary	
16	Public, there being present:	
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1	ADDUADANGEG	
2	APPEARANCES	
	KLINE & SPECTER, P.C.	
3	BY: THOMAS BOSWORTH, ESQUIRE	
4	AARON DUNBAR, ESQUIRE 1525 Locust Street	
-	Philadelphia, Pennsylvania 19102	
5	(215)772-1000	
_	Representing the Plaintiffs	
6	HOGAN LOVELLS, LLP	
7	BY: JENNIFER ADAMS, ESQUIRE	
_	ROBERT BEECHER, ESQUIRE	
8	1735 Market Street Philadelphia, Pennsylvania	
9	Jennifer.adams@hoganlovells.com	
	Representing the Defendants	
LO	GREENBERG TRAURIG	
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L4	Representing the Defendants	
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L6		
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- 1 | haven't submitted the report, do you know how
- 2 | much ethylene oxide B. Braun has emitted in
- 3 2021?
- 4 A. I don't have a final number for that
- 5 yet.
- 6 Q. Do you know the amount of ethylene
- 7 oxide B. Braun emitted in any of the years
- 8 | that they emitted ethylene oxide prior to
- 9 | 2019?
- 10 MS. ADAMS: Tom, in order to
- 11 avoid me objecting to every question, I just
- 12 | ask for a running objection on all of this.
- MR. BOSWORTH: That's fair, yes.
- 14 You can answer, sir.
- 15 THE WITNESS: I don't know the
- 16 exact numbers and specific years of what
- 17 those totals are. I'd have to look at the
- 18 recording to be clear and exact on what the
- 19 exact numbers of emissions were on those
- 20 years. I don't want to state something
- 21 false.
- 22 BY MR. BOSWORTH:
- 23 | O. Do you even have a ballpark estimate
- 24 | as to how much ethylene oxide B. Braun

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- 1 | emitted in 2019?
- 2 A. Maybe in the 2 tons. About 2 tons, if
- 3 | I recall.
- 4 Q. In 2019?
- 5 A. 2019, that's what you asked, correct?
- 6 | Q. Yes. Do you have a ballpark
- 7 understanding of how much ethylene oxide B.
- 8 | Braun emitted in 2020?
- 9 A. Slightly over a ton, I believe.
- 10 Q. Do you have a ballpark estimate of how
- 11 | much ethylene oxide B. Braun emitted in 2021?
- 12 A. Would be less than a ton.
- 13 | Q. Do you have any ballpark estimate for
- 14 | how much ethylene oxide B. Braun emitted in
- 15 any of the years before you joined the
- 16 | company?
- 17 A. I don't off the top of my head.
- 18 Q. Were you ever told by anybody at B.
- 19 Braun to not publicize the amounts of
- 20 ethylene oxide that B. Braun emits?
- MS. ADAMS: Objection, form.
- 22 Goes to the merit, has nothing to do with
- 23 | forum non conveniens.
- 24 BY MR. BOSWORTH: