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UNITED STATES OF AMERICA

CONSUMER PRODUCT SAFETY COMMISSION

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: CPSC Docket No. 12-2  
In the Matter of : CPSC Docket No. 13-2  
:  
ZEN MAGNETS, LLC : Hon. Dean C. Metry  
STAR NETWORKS USA, LLC :  
:  
Respondents. :  
- - - - -x

DEPOSITION OF BOYD EDWARDS

Bethesda, Maryland  
Tuesday, July 22, 2014

REPORTED BY:  
CARMEN SMITH

1           Deposition of BOYD EDWARDS, called for  
2           examination pursuant to notice of deposition, on  
3           Tuesday, July 22, 2014, in Bethesda, Maryland, at  
4           the Consumer Product Safety Commission, 4330  
5           East-West Highway, 4th Floor, at 10:21 a.m., before  
6           CARMEN SMITH, a Notary Public within and for the  
7           District of Columbia, when were present on behalf of  
8           the respective parties:

9

10                   RAY M. ARAGON, ESQ.

11                   DANIEL VICE, ESQ.

12                   U.S. Consumer Product Safety Commission

13                   4330 East-West Highway, Suite 702

14                   Bethesda, Maryland 20814-4408

15                   301-504-7809; Fax: 301-504-0403

16                   raragon@cpsc.gov

17                   dvice@cpsc.gov

18                   Complaint Counsel for U.S. Consumer Product

19                   Safety Commission

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-- continued --

1 APPEARANCES (Continued):

2

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9 On behalf of Respondents Zen Magnets and

10 Star Networks USA

11

12

13 ALSO PRESENT: SHIHAN QU

14 ROBERT HOLUP

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1 PROCEEDINGS

2 Whereupon,

3 BOYD EDWARDS

4 was called as a witness and, having first been duly  
5 sworn, was examined and testified as follows:

6 EXAMINATION

7 BY MR. ARAGON:

8 Q Dr. Edwards, my name is Ray Aragon. I'll  
9 be asking you some questions this morning. Would  
10 you please state your full name and address.

11 A Boyd Edwards, 921 North 2000 West, Vernal,  
12 Utah 84078.

13 Q Is there any reason why you cannot give  
14 full and accurate testimony this morning?

15 A No.

16 Q You've been identified as a potential  
17 expert by counsel for Zen Magnets. Do you intend to  
18 offer expert opinions in this litigation?

19 A Yes.

20 Q Please give me the subjects of the expert  
21 opinions that you'll be offering in this litigation.

22 A I will offer my opinion about the

1           Q     All right.  Now, Mr. Aragon asked you a  
2     whole series of questions regarding the data upon  
3     which you relied and its reliability, its underlying  
4     reliability.

5                     And you have been conducting experiments  
6     and doing educational matters for years, correct,  
7     decades, at least a couple of decades?

8           A     Yes.

9           Q     Now, based on your experience -- I'm going  
10    to ask this question a different way than he did.  
11    Based on your experience, can you think of reasons  
12    why your conclusion about the utility of magnets in  
13    a classroom, whether it's physics, biology, math --  
14    why we shouldn't rely on what your conclusions have  
15    been?

16          A     No.

17          Q     And in your experiments in physics, for  
18    example, have you relied on the -- on anecdotal  
19    evidence presented by other people as part of your  
20    work in the past?

21          A     As part of this report or work --

22          Q     No, in general.  Your work as a physicist.

1 Have you at times relied upon anecdotal evidence of  
2 other people's findings or experiments themselves?

3 A Yes. That's what science is all about.  
4 You base -- you make headway on a problem based on  
5 the contributions of others.

6 Q And in discerning which comments -- for  
7 example, you relied in part on comments that you  
8 found -- first of all, where did you find the  
9 comments that you rely upon that you identify in  
10 your appendix, and I think it's appendix A? Where  
11 did you find those comments?

12 A I found them in three different places  
13 listed on page 15. Letters written to legislators,  
14 comments made during the public comment period and  
15 comments made by signers of a petition.

16 Q Okay. Let me ask it more specifically.  
17 How did you actually get the comments? Was it  
18 online?

19 A Online.

20 Q Was it easy to find?

21 A Yes.

22 Q Was it in the public domain?