\*\*Deposition of Thelma Watkins\*\*

\*\*Attorney:\*\* Good morning, Ms. Watkins. Could you please state your full name for the record?

\*\*Thelma Watkins:\*\* Thelma Marie Watkins.

\*\*Attorney:\*\* Thank you. Ms. Watkins, we're here to discuss the defective toothpaste that allegedly contained harmful chemicals. Can you recall when you first purchased this toothpaste?

\*\*Thelma Watkins:\*\* Yes, I remember it clearly. It was a few days before my niece's birthday, which is always the second Sunday in March. I had gone shopping that Friday before her birthday to pick up some last-minute items.

\*\*Attorney:\*\* And when did you first notice something was wrong with the toothpaste?

\*\*Thelma Watkins:\*\* It was about a week after my cousin's wedding anniversary, which they celebrate every year on the last Friday of April. I remember because we had a family gathering the following weekend, and I mentioned to my sister that the toothpaste tasted odd.

\*\*Attorney:\*\* Did you report the issue immediately?

\*\*Thelma Watkins:\*\* No, I didn't. I waited until after my son's school year ended, which is usually the third Wednesday in June. I thought it might just be a temporary issue, but when it persisted, I decided to contact the company.

\*\*Attorney:\*\* When did you receive a response from the company?

\*\*Thelma Watkins:\*\* It was shortly after my neighbor's annual summer barbecue, which they hold on the first Saturday of July. I remember checking my email the following Monday and seeing their response.

\*\*Attorney:\*\* Did you experience any health issues?

\*\*Thelma Watkins:\*\* Yes, I started feeling unwell around the time of my annual check-up, which is always scheduled for the second Monday in August. I had been using the toothpaste for a few months by then, and I noticed my gums were unusually sensitive.

\*\*Attorney:\*\* When did you seek medical attention?

\*\*Thelma Watkins:\*\* I went to see my doctor a few days before my friend's Labor Day party, which is the first Monday in September. I was concerned because the symptoms weren't going away.

\*\*Attorney:\*\* Did your doctor provide any diagnosis?

\*\*Thelma Watkins:\*\* Yes, I got the results a week after my brother's birthday, which falls on the third Thursday of October. The doctor said I had a mild chemical burn in my mouth, which was quite alarming.

\*\*Attorney:\*\* When did you stop using the toothpaste?

\*\*Thelma Watkins:\*\* I stopped using it right after Halloween, which is the last day of October. I didn't want to take any more chances with my health.

\*\*Attorney:\*\* Did you inform anyone else about the issue?

\*\*Thelma Watkins:\*\* Yes, I told my sister during our Thanksgiving dinner, which is the fourth Thursday of November. She was shocked and advised me to take further action.

\*\*Attorney:\*\* When did you decide to take legal action?

\*\*Thelma Watkins:\*\* It was after the New Year's celebration, which is the first day of January. I had done some research and found out that other people were experiencing similar issues.

\*\*Attorney:\*\* Did you keep any records of your purchases?

\*\*Thelma Watkins:\*\* Yes, I found the receipts while doing my spring cleaning, which I usually start on the first weekend of April. I kept them in a folder with other important documents.

\*\*Attorney:\*\* When did you first meet with your attorney?

\*\*Thelma Watkins:\*\* It was a few days before Valentine's Day, which is the 14th of February. I wanted to make sure I had all my information in order before seeking legal advice.

\*\*Attorney:\*\* Did you contact any consumer protection agencies?

\*\*Thelma Watkins:\*\* Yes, I reached out to them right after my daughter's school started, which is the first Tuesday after Labor Day. They were very helpful and provided me with additional resources.

\*\*Attorney:\*\* When did you receive a response from the consumer protection agency?

\*\*Thelma Watkins:\*\* It was a week before my wedding anniversary, which is the second Saturday of May. They confirmed that they were investigating the issue and would keep me updated.

\*\*Attorney:\*\* Did you keep using the toothpaste after noticing the issue?

\*\*Thelma Watkins:\*\* No, I stopped immediately after my dentist appointment, which is always the first Thursday of June. My dentist advised me to discontinue use and switch to a different brand.

\*\*Attorney:\*\* When did you first hear about other people having similar issues?

\*\*Thelma Watkins:\*\* It was during a community meeting, which we have on the last Wednesday of every month. Several people mentioned they had experienced problems with the same brand of toothpaste.

\*\*Attorney:\*\* Did you participate in any group actions?

\*\*Thelma Watkins:\*\* Yes, I joined a group lawsuit right after the Fourth of July parade, which is on the 4th of July. We felt that a collective effort would have a stronger impact.

\*\*Attorney:\*\* Can you describe any other significant events related to this issue?

\*\*Thelma Watkins:\*\* Certainly. I remember discussing the issue with my book club, which meets on the third Thursday of every month. That was around the time of my daughter's dance recital, which is the second Saturday in November. We decided to write a letter to the manufacturer together.

\*\*Attorney:\*\* Did you receive any response to the letter?

\*\*Thelma Watkins:\*\* Yes, we got a reply just before Christmas, which is the 25th of December. The company acknowledged our concerns but didn't offer any concrete solutions.

\*\*Attorney:\*\* When did you first notice the media coverage about the defective toothpaste?

\*\*Thelma Watkins:\*\* It was a few days after Easter, which varies each year but was in early April that year. I saw a news segment that featured several affected consumers.

\*\*Attorney:\*\* Did you participate in any media interviews?

\*\*Thelma Watkins:\*\* Yes, I was interviewed by a local news station a week after my husband's birthday, which is the first Monday of March. They wanted to hear firsthand accounts from affected individuals.

\*\*Attorney:\*\* When did you first consult with a medical specialist about your symptoms?

\*\*Thelma Watkins:\*\* It was a few days before Memorial Day, which is the last Monday in May. The specialist confirmed that the chemicals in the toothpaste were likely the cause of my symptoms.

\*\*Attorney:\*\* Did you receive any compensation from the company?

\*\*Thelma Watkins:\*\* No, I didn't. I received a generic apology letter a few days before Independence Day, which is the 4th of July, but no offer of compensation.

\*\*Attorney:\*\* When did you decide to escalate the issue legally?

\*\*Thelma Watkins:\*\* It was after my daughter's birthday party, which is the third Saturday in August. I felt that the company's response was inadequate and wanted to ensure they were held accountable.

\*\*Attorney:\*\* Thank you, Ms. Watkins. That will be all for now.

\*\*Follow-Up Deposition of Thelma Watkins\*\*

\*\*Attorney:\*\* Good afternoon, Ms. Watkins. Thank you for coming back for this follow-up interview. We need to clarify a few more nuanced and specific issues regarding the defective toothpaste. Can you recall when you first experienced any physical symptoms?

\*\*Thelma Watkins:\*\* Good afternoon. Yes, I first noticed symptoms on April 30, 2023. My gums were sore, and I had a strange metallic taste in my mouth.

\*\*Attorney:\*\* And when did you first visit your dentist regarding these symptoms?

\*\*Thelma Watkins:\*\* I saw my dentist on May 4, 2023. He was quite concerned and suggested I stop using the toothpaste immediately.

\*\*Attorney:\*\* Did you follow his advice right away?

\*\*Thelma Watkins:\*\* Yes, I stopped using the toothpaste that same day, May 4, 2023.

\*\*Attorney:\*\* When did you first contact the toothpaste manufacturer to report the issue?

\*\*Thelma Watkins:\*\* I contacted them on May 10, 2023. I wanted to give them a chance to address the problem directly.

\*\*Attorney:\*\* Did you receive a response from the manufacturer?

\*\*Thelma Watkins:\*\* Yes, I received an email response on May 15, 2023. They acknowledged my complaint but didn't offer any immediate solutions.

\*\*Attorney:\*\* When did you decide to seek legal counsel?

\*\*Thelma Watkins:\*\* I decided to seek legal counsel on June 1, 2023, after discussing the issue with my family and realizing the potential severity of the situation.

\*\*Attorney:\*\* Can you describe any other health issues you experienced?

\*\*Thelma Watkins:\*\* Sure. On June 10, 2023, I started experiencing headaches and nausea, which my doctor later attributed to the chemicals in the toothpaste.

\*\*Attorney:\*\* When did you first hear about other people experiencing similar issues?

\*\*Thelma Watkins:\*\* I first heard about it on June 20, 2023, during a community meeting. Several neighbors mentioned they had similar problems with the same brand of toothpaste.

\*\*Attorney:\*\* Did you take any further action after hearing about others' experiences?

\*\*Thelma Watkins:\*\* Yes, on June 25, 2023, I joined a group lawsuit with other affected individuals. We felt that a collective effort would be more effective.

\*\*Attorney:\*\* When did you first meet with the group to discuss the lawsuit?

\*\*Thelma Watkins:\*\* We had our first meeting on July 1, 2023. It was a productive session where we shared our experiences and planned our next steps.

\*\*Attorney:\*\* Did you receive any medical treatment for your symptoms?

\*\*Thelma Watkins:\*\* Yes, I received treatment on July 5, 2023. My doctor prescribed medication to help with the chemical burns in my mouth.

\*\*Attorney:\*\* When did you first notice any improvement in your symptoms?

\*\*Thelma Watkins:\*\* I started feeling better around July 15, 2023, after following my doctor's treatment plan.

\*\*Attorney:\*\* Did you keep any records of your medical visits and treatments?

\*\*Thelma Watkins:\*\* Yes, I kept detailed records of all my medical visits and treatments. I have them all dated and organized.

\*\*Attorney:\*\* When did you first consult with a specialist about your symptoms?

\*\*Thelma Watkins:\*\* I consulted with a specialist on August 1, 2023. He confirmed that the chemicals in the toothpaste were the likely cause of my symptoms.

\*\*Attorney:\*\* Did you receive any compensation from the manufacturer?

\*\*Thelma Watkins:\*\* No, I did not. I received a generic apology letter on August 10, 2023, but no offer of compensation.

\*\*Attorney:\*\* When did you decide to escalate the issue legally?

\*\*Thelma Watkins:\*\* I decided to escalate the issue legally on August 20, 2023, after realizing that the manufacturer's response was inadequate.

\*\*Attorney:\*\* Thank you, Ms. Watkins. That will be all for now.