



EXPERT TESTIMONY: TRICHLOROETHYLENE EXPOSURE

Background	<p>An engineer filed a lawsuit against firms that made or supplied various chemicals to his employer, a Philadelphia metal fabricator, alleging that their products caused his illness. Patrick Rafferty was retained to review the case on behalf of a supplier of trichloroethylene (TCE) and serve as an expert witness testifying to the likely TCE exposure experienced by the plaintiff, and the defendant's contribution to that exposure.</p>
Our Approach	<p>Mr. Rafferty reviewed extensive records, including the Complaint, responses to interrogatories, deposition transcripts, purchasing records, employment records, and expert reports prepared on behalf of the plaintiff.</p> <p>From this information, he developed an exposure profile to the TCE that was provided by this defendant and used in a vapor degreaser. Company records showed that the vapor degreaser was only present in the workplace for a portion of the plaintiff's employment. In addition, the plaintiff's employment records and testimony by co-workers showed that the time he spent near a degreaser changed considerably over the course of his career. This exposure profile was then compared to OSHA, NIOSH, ACGIH-TLV, and other standards and guidelines.</p>
Benefits and Added Value	<p>Mr. Rafferty's report provided critical input to the toxicology and medical expert reports, and was cited as being an important milestone in favorably settling the case on behalf of the defendants.</p>