

1 A. The same.

2 Q. Going back to your expert report that
3 we've marked Luebke Exhibit 3, I want to direct
4 your attention to Paragraph 10.

5 Let me know when you're there.

6 A. I am there.

7 Q. Okay. In the middle of that paragraph
8 you state, in later experiments you came up with
9 the idea of heat treating nickel-titanium
10 endodontic files that were not coated, and
11 tested these instruments after they were heat
12 treated.

13 Do you see that?

14 A. Yes.

15 Q. What possessed you to heat treat
16 nickel-titanium endodontic files?

17 MR. DAHLGREN: Objection; form.
18 Objection; vague.

19 THE WITNESS: That actually explains
20 it pretty well.

21 I had discussions with endodontists
22 who were complaining about, we call them broken,
23 separated, fractured files in teeth. And I had
24 not used those instruments because of that. And
25 so before I was going to do that, I wanted to

1 solve -- see if I could solve a -- a problem.

2 BY MR. GINSBERG:

3 Q. Why did you think that one way to
4 solve the problem would be to heat treat a
5 nickel-titanium endodontic file?

6 MR. DAHLGREN: Objection; form.
7 Vague.

8 THE WITNESS: That isn't where I
9 started.

10 BY MR. GINSBERG:

11 Q. But you eventually got there.

12 MR. DAHLGREN: Same objections.

13 THE WITNESS: That would be a
14 quantum --

15 MR. DAHLGREN: Is there a question?

16 THE WITNESS: That would be a quantum
17 leap, however.

18 BY MR. GINSBERG:

19 Q. How did you get to -- like, why did
20 you think you should heat treat nickel-titanium
21 files? How did that idea come into your mind?

22 MR. DAHLGREN: Objection; form.
23 Compound.

24 THE WITNESS: I thought the reason
25 nickel-titanium files were fracturing is because

1 they weren't sharp enough. So my first -- I
2 first addressed sharpness with diamond coating.

3 Talking to manufacturers, talking
4 -- talking -- looking at some of the things
5 that came with it, I realized there may be
6 more problems with diamonds than with the files
7 themselves.

8 The concept was still sharpness. So I
9 decided if I TIN coated them, I could, perhaps,
10 make them sharper.

11 So that's what I did.

12 BY MR. GINSBERG:

13 Q. How did you get to heat treating?

14 MR. DAHLGREN: Objection; form.

15 THE WITNESS: Are you aware of the TIN
16 coating process?

17 BY MR. GINSBERG:

18 Q. Explain it.

19 A. TIN coating process is the short
20 for titanium nitride. And I took some files
21 to a heat treater. We figured out a jig that it
22 would work in. And we did the titanium nitride,
23 which is placing the files in a furnace,
24 evacuating the atmosphere and replacing it with
25 nitrogen, having a pure titanium rod, put

1 electricity across it, it atomizes and it
2 deposits on the files. And that's how you TIN
3 coat them.

4 Q. Okay. And that's what's referred to
5 as your earliest experiments, correct?

6 MR. DAHLGREN: Objection; form.

7 THE WITNESS: That would be correct.

8 BY MR. GINSBERG:

9 Q. Then you say, in later experiments,
10 you came up with the idea of heat treating
11 nickel-titanium endodontic files that were not
12 coated.

13 Do you see that?

14 A. Yes.

15 Q. How did you come up with the idea of
16 heat treating nickel-titanium files that were
17 not coated?

18 MR. DAHLGREN: Objection; form.

19 THE WITNESS: I tested the TIN coated
20 files, and I was satisfied with some of the
21 results, using 3630-1, General Requirements.

22 My concern, however, was, although
23 it may have made it sharper, was there a
24 possibility that the TIN coating could come
25 off, just like the diamond might have, and so I

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