

EXHIBIT 6

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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA

KATHLEEN MOLLER

vs.

NO: 24-0228-WBV-DPC

MARTIAN SALES, INC.;
JOPEN, LLC, a Texas
limited Liability company;
JOHNSON FOODS, LLC, a Wyoming
limited liability company;
CAG Holdings, LLC, a Wyoming
limited liability company;
RMH HOLDINGS, INC., a Wyoming
corporation, et al.

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The remote video deposition of
CHRISTOPHER McCURDY, Ph.D.,
taken via Zoom web conference on
January 28, 2026, commencing at
approximately 9:56 a.m. EST

Job No. MDLG7836268

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1 involving an alleged cardiac adverse event caused
2 by kratom, this is an important fact to get
3 right. Right?

4 A Correct.

5 Q Does this change your opinion at all in
6 this case?

7 A No.

8 Q Why not?

9 A Because I didn't -- I didn't say that
10 dehydration was a contributing factor in my
11 conclusions.

12 Q All right. Let's look here. You note
13 that the University of San Francisco analysis
14 utilized a comprehensive drug library consisting
15 of 912 new psychoactive substances, 161
16 traditional illicit drugs, 27 dietary
17 supplement -- supplement stimulants, and 93
18 prescription drugs or over-the-counter drugs.

19 Did I read that right?

20 A That's what I believe was in their
21 report, yes.

22 Q And new psychoactive substances are
23 often known as NPS, or referred to as NPS; right?

24 A They can be, yes.

25 Q Do you know how many analytes were

1 Q But then --

2 A There's certain- -- there's certainly
3 the risk that, because we don't know, that all of
4 the substances could have contributed. But I
5 don't think one substance can be identified as
6 the -- the single substance.

7 Q That -- that wasn't my question. My
8 question was that diphenhydramine, promethazine,
9 and kratom all combined could cause and
10 contribute to QT prolongation.

11 MS. PAYTON:

12 Object to the form.

13 MR. COWGILL:

14 Q Is that not -- is that not right?

15 MS. PAYTON:

16 Asked and answered.

17 A Potentially.

18 MR. COWGILL:

19 Q In fact, you state, your -- your
20 closing sentence here states "all the substances
21 in the decedent's system could have
22 contributed" --

23 A Yes.

24 Q -- "a sudden cardiac death, and none
25 can be ruled out, as the combination has not been

1 evaluated in preclinical or clinical studies."

2 Right? That's your ultimate opinion in this
3 case.

4 A That's what I just said. Yes.

5 Q Okay. And, so, that includes kratom;
6 right? The kratom could have contributed to a
7 sudden cardiac death, and it cannot be ruled out.

8 MS. PAYTON:

9 Object to the form.

10 MR. COWGILL:

11 Q Is that correct?

12 A I said none of them can be ruled out.
13 Yes.

14 MR. COWGILL:

15 Q Which includes kratom; right?

16 A That would be amongst the three. Yes.

17 Q Amongst the three. So are we excluding
18 THC?

19 A No. I thought you were urn
20 specifically speaking of diphenhydramine,
21 promethazine. I apologize.

22 Q I'm just trying to make sure I
23 understand your opinion.

24 A If we put all of them, yeah, they could
25 have all contributed, everything that's there.