

EXHIBIT 15

Page 1

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA

- - -

KATHLEEN MOLLER,

:

:

Plaintiff,

:

:

vs.

:

Case 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.,

:

:

Defendants.

:

- - -

REMOTE VIDEOTAPED DEPOSITION OF

EDWARD W. BOYER, M.D., Ph.D.

- - -

Tuesday, February 17, 2026

at 10:03 a.m.

- - -

REPORTED BY: CAROL A. KIRK, CSR-9139

Job No. MDLG7836483

1 A. That's pretty expansive, yes.

2 Q. And you indicated we don't have an
3 elevated serum caffeine concentration identified
4 in this case, just a presumptive positive, no
5 quantification at all, right?

6 A. It's presumptive positive because
7 it's not quantified. But, yes, you're correct.

8 Q. And this also refers to
9 diphenhydramine, jimsonweed, and other
10 anticholinergic agents. It states, "The presence
11 of delirium with hyperactivity, mumbling speech,
12 and dry skin suggests poisoning with an
13 anticholinergic agent."

14 Did I read that correctly?

15 A. You did.

16 Q. And we didn't see any presence of
17 delirium with hyperactivity, mumbling speech, or
18 dry skin reported in relation to Harmony Moller
19 preceding her death, right?

20 A. There's none reported by mom either
21 immediately -- either to first responders or in
22 her deposition.

23 Q. All right. So with withdrawal
24 symptoms in use disorder -- "So in a patient with
25 kratom dependence and withdrawal, we suggest