

EXHIBIT 28

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA

KATHLEEN MOLLER

VS.

MARTIAN SALES, INC.; JOPEN,
LLC, A TEXAS LIMITED
LIABILITY COMPANY; JOHNSON
FOODS, LLC, A WYOMING
LIMITED LIABILITY COMPANY;
LP IND., LLC, A WYOMING
LIMITED LIABILITY COMPANY;
CAG HOLDINGS, LLC, A WYOMING
LIMITED LIABILITY COMPANY;
RMH HOLDINGS, INC., A
WYOMING CORPORATION; ABC
INSURANCE COMPANY AND JOHN
DOES 1-4.

CIVIL ACTION NO.

24-0028-WBV-DPC

Video Deposition of ALLEN L. DOLLAR,
MD, FACC, FACP, taken on Friday, February 6,
2026, via Zoom videoconference.

Dr. Allen Dollar
February 6, 2026

103

1 A Correct.

2 Q Again, you don't think THC had anything to
3 do with it?

4 A That's correct.

5 Q All right. And you think those two are the
6 likely causes of the arrhythmia that led to
7 her death?

8 A Yes.

9 Q However, as we sit here today, given the
10 literature and the lack of literature and
11 the lack of study, isn't it true you cannot
12 tell me whether or not mitragynine or
13 kratom played a role in her death?

14 MS. CONGER:

15 Object to form.

16 THE WITNESS:

17 What literature there is that
18 raises concern, all involve serum
19 levels of mitragynine 10 times or more
20 than what was found in Harmony. So
21 can I say for a fact that, at 150,
22 that there was -- that it is
23 impossible that it played a role? No.
24 We don't -- we do not have data, to
25 your point, to say it's impossible.

Dr. Allen Dollar
February 6, 2026

104

1 BY MS. HICKMAN:

2 Q Sure.

3 A But it seems very unlikely, if this stuff
4 is potentially harmful, that, given the
5 amount of this stuff that's out there and
6 the number of people who are potentially
7 have suffered harm, the levels have all
8 been substantially higher. That's the
9 basis of my opinion.

10 Q Understand. Just to make this a little
11 sharper, you cannot rule out that kratom,
12 along with Phenergan and Benadryl, created
13 an arrhythmia that caused Harmony's death.
14 Is that fair?

15 MS. CONGER:

16 Object to form. Mischaracterizes
17 opinion and asks for answers.

18 THE WITNESS:

19 If the definition of "rule out"
20 means zero possibility, I cannot state
21 that.

22 BY MS. HICKMAN:

23 Q And that's what I mean. I completely
24 understand that it is not your opinion that
25 that's what happened. I read your report.