

Louis Kyriakoudes

Name	Louis M. Kyriakoudes
Professional Occupation	Professor
Institution	University of Southern Mississippi
Website	http://www.usm.edu/history/faculty/louis-kyriakoudes
Short Description	<p>As a specialist in the social and economic history of the 19th and 20th century United States, Kyriakoudes has published works titled <i>The Social Origins of the Urban South: Race, Gender and Migration in Nashville and Middle Tennessee, 1890-1930</i> (University of North Carolina Press, 2003). He has authored articles in <i>The Alabama Review</i>, <i>Agricultural History</i>, <i>Social Science History</i>, <i>Southern Cultures</i>, and <i>Tobacco Control</i> as well as in various edited collections and encyclopaedias. He is currently working on two projects: (1) a history of cigarette use in the 20th century and (2) a study of the demography of rural poverty in the American South in the 19th and 20th centuries. Kyriakoudes is the director of the Center for Oral History and Cultural Heritage at the University of Southern Mississippi.</p>

In an article in *the Nation* from 2010, Kyriakoudes explains he has been harassed by the tobacco industry. Kyriakoudes declared in Wiener's article that he had been deposed "at least seven or eight times" by tobacco's legal counsel.¹ Tobacco's legal strategy seems to be to make witnessing for the plaintiffs an even more time-consuming activity, which involves risks for their own financial situation and research. Kyriakoudes told Wiener: "I've cut back a lot of what I've been doing" and "They hit me pretty hard, making it difficult to do my research. So I've pulled out of cases. I cut back to one or two trials a year. Harassment is effective."²

In 2009, Kyriakoudes was involved in 12 tobacco related court cases. The following years that number dropped considerably. He worked on six cases 2010 and on five in 2011 with similar

¹ Wiener, Jon. 2010. Re 'Big Tobacco and the Historians', Wiener Replies. *The Nation*, March 9. <http://www.thenation.com/article/re-big-tobacco-and-historians>. Accessed Oct 31 2014.

² Wiener, as n. 1.

lower numbers for 2012 and 2013. Kyriakouides has been active in as an expert witness from 2000 onward and has been involved in 66 cases. His hourly rate for testimony was \$400 in 2010.³ In 2013 Kyriakouides declared he charged \$450 an hour for his research as an expert judicial witness.⁴

Kyriakouides has been a prominent expert witness in tobacco litigation. In 2006 he published an article in tobacco control on the subject of historical testimony in tobacco related court cases.⁵ Kyriakouides has been the research team leader in 2003 on “Public Understanding of the Risks of Tobacco Use and Passive Smoking” and “Tobacco Deposition and Trial Transcript Research Project” with Ronald Davis, M.D. as the principal investigator. The project is funded by the National Cancer Institute and the American Legacy Foundation to the Michigan Public Health Institute, and the Center for Tobacco Use Prevention and Research. His current research is titled: “Why We Smoke? Culture, History, and the North American Origins of the Global Tobacco Epidemic.” Kyriakouides has, furthermore, given multiple lectures on his involvement in tobacco litigation and his research on the subject. For example, in 2013, Kyriakouides gave a lecture entitled “Disputed Science, the Tobacco Industry, the Press, and the Public” at the Eighth World Conference of Science Journalists in Helsinki, Finland.

Education	Ph.D.
Major Fields	19th & 20th century US economic history, US urban history, social history of the American South
Major Publications	The Social Origins of the Urban South: Race, Gender and Migration in Nashville, and Middle Tennessee, 1890-1930. (2003), Historians Testimony on 'Common Knowledge' of the Risks of Tobacco Use: A Review and Analysis of Experts Testifying on Behalf of Cigarette Manufacturers in Civil Litigation. (2006), The Grand Ole Opry and Big Tobacco: Radio Transcripts from the Files of the R. J. Reynolds Tobacco Company, 1948 to 1959. (2006);

³ See affidavit of Luis Kyriakouides, December 8, 2010, *Jones v. Philip Morris*. Westlaw reference: 2010 WL 9551992.

⁴ See affidavit of Luis Kyriakouides, December 2, 2013, *Hartford v. R.J. Reynolds*. Westlaw reference: 2013 WL 8505972.

⁵ Kyriakouides, Louis. 2006. Historians' Testimony on 'Common Knowledge' of the Risks of Tobacco Use: a Review and Analysis of Experts Testifying on Behalf of Cigarette Manufacturers in Civil Litigation. *Tobacco Control* 15, 107-116.

Selling Which South? Economic Change in Rural and Small-Town North Carolina in an Era of Globalization, 1940-2007 (2007)

Number of Cases 66

Case ⁶	Year	Manner of Involvement
1. Boerner v. Brown & Williamson Tobacco	2000-2003	Deposition and Testimony
2. Cannon v. Brown & Willison Tobacco	2000	Affidavit
3. Allen v. R.J. Reynolds	2002-2003	Designated
4. Campbell v. R.J. Reynolds	2002-2013	Testimony
5. Eiser v. Brown & Williamson ⁷	2002-2005	Testimony Precluded
6. Landers v. R.J. Reynolds	2002	Deposition and Testimony
7. Eastman v. Brown & Williamson Tobacco	2003	Testimony
8. Frankson v. Brown & Williamson Tobacco	2003-2007	Testimony
9. Hall v. R.J. Reynolds	2003	Designated
10. Reller v. Philip Morris	2003-2005	Deposition
11. Rose v. The American Tobacco	2003-2007	Affidavit
12. Rosol v. R.J. Reynolds	2003	Deposition
13. Standish v. The American Tobacco	2003	Affidavit
14. Tomasino v. American Tobacco	2003	Affidavit
15. Arnitz v. Philip Morris	2004	Deposition and Testimony

⁶ Compiled with following online databases: <http://legacy.library.ucsf.edu>, <http://tobaccodocuments.org>, <http://lawschool.courtroomview.com/experts>, & Westlaw. This profile is furthermore completed with information from personal correspondence with Mr. Kyriakoudes. In Engle Progeny Cases many depositions and testimonies are reused in other cases instead of solely in the case where the actual testimony was given for the first time. I list these cases separately because in each one the deposition or testimony was submitted as important evidence and thereby it influenced the court and the jury.

⁷ The Court properly precluded Dr. Louis Kyriakoudes from presenting testimony because Plaintiff intended to introduce through Dr. Kyriakoudes the testimony the Court had ruled Dr. Cummings could not give. This was impermissible insofar as it would have resulted in the circumvention of a court order and the introduction of evidence previously ruled inadmissible. In addition, no abuse of discretion occurred here because the Plaintiff failed to identify Dr. Kyriakoudes in a timely fashion so as to give the Defendants sufficient time to prepare a defence to his testimony. Moreover, in setting forth the gist of the doctor's testimony during the discovery, the Plaintiff failed to provide a clear picture of what she intended to elicit from the doctor, thereby impeding the Defendants in their preparation of a defence. See, *Eiser v. Brown & Williamson Tobacco Corp.* Westlaw reference: 2006 WL 933394.

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16. Coolidge v. Philip Morris	2004-2005	Deposition and Testimony
17. Gadelata v. Lorillard Tobacco	2004	Testimony
18. Mash v. Brown & Williamson	2004	Deposition
19. Moore v. R.J. Reynolds	2004	Deposition
20. Beckum v. Philip Morris	2005-2006	Deposition and Testimony
21. Gerrity v. R.J. Reynolds	2005	Deposition
22. Hargroves v. Philip Morris	2005	Designated
23. Rosen v. Brown & Williasmon Tobacco	2005	Testimony
24. Ertman v. R.J. Reynolds	2007	Deposition
25. Ferlanti v. Liggett Group, Inc. et al	2007-2009	Cross-examination
26. Dorn v. R.J. Reynolds	2008	Designated
27. Evers v. R.J. Reynolds	2008-2013	Deposition
28. Grant v. R.J. Reynolds	2008-2009	Designated
29. Hess v. R.J. Reynolds	2008-2009	Deposition and Testimony
30. Kalyvas v. Philip Morris	2008-2009	Precluded ⁸
31. Loyd v. R.J. Reynolds	2008	Designated
32. Martin v. R.J. Reynolds	2008-2009	Deposition and Testimony
33. Putney v. R.J. Reynolds	2008-2010	Deposition
34. Rodriguez v. R.J. Reynolds	2008	Designated
35. Tullo v. R.J. Reynolds	2008-2011	Designated
36. Barbanell v. R.J. Reynolds	2009-2014	Deposition and Testimony
37. Bifolck v. Philip Morris	2009-2012	Deposition
38. Buonomo v. R.J. Reynolds	2009	Deposition
39. Clay v. R.J. Reynolds	2009	Deposition
40. Grossman v. R.J. Reynolds	2009-2013	Deposition
41. Hall v. R.J. Reynolds	2009-2010	Deposition and Testimony
42. In re: Engle Progeny Cases ⁹	2009-2014	Deposition
43. Izzarelli v. R.J. Reynolds	2009-2010	Deposition
44. Kaplan v. Philip Morris	2009	Deposition

⁸ Dr. Kyriakoudes was not allowed to give a deposition or testimony in this case because the plaintiff had been a member of the Greek public for most of his live; considering that Dr. Kyriakoudes was going to testify on the misinformation concerning smoking and health that Defendants allegedly disseminated to the American public, the court precluded Kyriakoudes as a witness. See *Kalyvas v. Philip Morris*, 2008 WL 6333456.

⁹ Pertaining to Currao, Desbaies, Elkins, Harford, Jolley, Lydick, Marrazzo, Meeker, and Mogell.

45. Koballa v. R.J. Reynolds	2009-2010	Deposition
46. Sherman v. R.J. Reynolds	2009	Cross-examination
47. Willis v. Philip Morris	2009	Deposition
48. Alexander v. R.J. Reynolds	2010-2012	Deposition and Testimony
49. Castleman v. R.J. Reynolds	2010	Deposition
50. Haldeman v. R.J. Reynolds	2010-2013	Deposition and Testimony
51. Jones v. Philip Morris	2010	Designated
52. Katz v. R.J. Reynolds	2010-2011	Deposition
53. Rohr v. R.J. Reynolds	2010	Deposition and Testimony
54. Calloway v. Philip Morris	2011	Deposition
55. Ciccone v. R.J. Reynolds	2011	Cross-examination
56. Jewett v. R.J. Reynolds	2011	Deposition and Testimony
57. Marotta v. R.J. Reynolds	2011-2013	Deposition
58. Weick v. Philip Morris	2011	Deposition and Testimony
59. Frailey v. R.J. Reynolds	2012	Deposition and Testimony
60. Hiott v. R.J. Reynolds	2012	Deposition and Testimony
61. Bowden v. R.J. Reynolds	2013-2014	Deposition
62. Deshaies v. R.J. Reynolds	2013	Affidavit
63. Elkins v. R.J. Reynolds	2013	Affidavit
64. Hartford v. R.J. Reynolds	2013	Testimony
65. Meeker v. R.J. Reynolds	2013	Deposition and Testimony
66. Morse v. R.J. Reynolds	2014	Testimony