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Transcript of Steven C. Brigham, M.D.

Date: October 31, 2017

Case: O'Connell -v- Associates in OB/GYN Care, LLC, et al.

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Email: transcripts@planetdepos.com

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Transcript of Steven C. Brigham, M.D.
Conducted on October 31, 2017

1 (1 to 4)

<p>1 IN THE UNITED STATES DISTRICT COURT</p> <p>2 FOR THE DISTRICT OF MARYLAND</p> <p>3-----x</p> <p>4 CHRISTY T. O'CONNELL, :</p> <p>5 Plaintiff, :</p> <p>6 v. : Case No.:</p> <p>7 AMERICAN MEDICAL ASSOCIATES : JFM-14-CV-1339</p> <p>8 P.C. et al., :</p> <p>9 Defendants. :</p> <p>10-----x</p> <p>11 Videotaped Deposition of STEVEN C. BRIGHAM, M.D.</p> <p>12 Baltimore, Maryland</p> <p>13 Tuesday, October 31, 2017</p> <p>14 9:38 a.m.</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20 Job No.: 162079</p> <p>21 Pages: 1 - 219</p> <p>22 Reported by: Stephanie L. Hummon, RPR</p>	<p>1 APPEARANCES</p> <p>2 ON BEHALF OF THE PLAINTIFF:</p> <p>3 EMILY C. MALARKEY, ESQUIRE</p> <p>4 BEKMAN, MARDER & ADKINS, L.L.C.</p> <p>5 300 West Pratt Street</p> <p>6 Suite 450</p> <p>7 Baltimore, Maryland 21201</p> <p>8 (410)539-6633</p> <p>9</p> <p>10 ON BEHALF OF THE DEPONENT:</p> <p>11 CHRISTOPHER J. GREANEY, ESQUIRE</p> <p>12 VERNICK & ASSOCIATES, LLC</p> <p>13 104 West Street</p> <p>14 Annapolis, Maryland 21404-0551</p> <p>15 (443)333-4044</p> <p>16</p> <p>17 ALSO PRESENT: Carolyn Correa, The Videographer</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p>
<p>1 Videotaped Deposition of</p> <p>2 STEVEN C. BRIGHAM, M.D., held at the offices of:</p> <p>3</p> <p>4</p> <p>5 BEKMAN, MARDER & ADKINS, L.L.C.</p> <p>6 300 West Pratt Street</p> <p>7 Suite 450</p> <p>8 Baltimore, Maryland 21201</p> <p>9 (410)539-6633</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16 Pursuant to Notice, before Stephanie L.</p> <p>17 Hummon, Registered Professional Reporter and Notary</p> <p>18 Public of the State of Maryland.</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p>	<p>1 CONTENTS</p> <p>2 EXAMINATION OF STEVEN C. BRIGHAM, M.D. PAGE</p> <p>3 By Ms. Malarkey 6</p> <p>4</p> <p>5 EXHIBITS</p> <p>6 (Attached to transcript)</p> <p>7 BRIGHAM DEPOSITION EXHIBITS</p> <p>8 Exhibit 1A Articles of Incorporation 118</p> <p>9 Exhibit 1B Amendment to Change Name 118</p> <p>10 Exhibit 2 E-mail, October 30, 2017 143</p> <p>11 Exhibit 3 Affidavit of 151</p> <p>12 Steven G. Brigham, M.D. in</p> <p>13 Support of Motion for Relief</p> <p>14 From Default Judgment</p> <p>15 Exhibit 4 Physician Independent 189</p> <p>16 Contractor Agreement</p> <p>17 Exhibit 5 Christy O'Connell's chart 196</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p>

Transcript of Steven C. Brigham, M.D.

2 (5 to 8)

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<p>1 PROCEEDINGS</p> <p>2 THE VIDEOGRAPHER: Here begins disc</p> <p>3 number one in the videotaped deposition of</p> <p>4 Dr. Steven Brigham, in the matter of O'Connell</p> <p>5 versus Associates in OB/GYN Care, LLC, et al., in</p> <p>6 the United States District -- District Court for</p> <p>7 the District of Maryland, Case Number JFM-14-1339.</p> <p>8 Today's date is October 31st, 2017. The</p> <p>9 time on the video monitor is 9:38 a.m.</p> <p>10 The videographer today is Carolyn Correa,</p> <p>11 representing Planet Depos.</p> <p>12 This video deposition is taking place at</p> <p>13 300 West Pratt Street, Baltimore, Maryland.</p> <p>14 Would counsel please voice identify</p> <p>15 themselves and state whom they represent.</p> <p>16 MS. MALARKEY: Emily Malarkey, on behalf</p> <p>17 of the Plaintiff, Christy O'Connell.</p> <p>18 MR. GREANEY: Christopher Greaney, on</p> <p>19 behalf of the Deponent, Steven Brigham.</p> <p>20 THE VIDEOGRAPHER: The court reporter</p> <p>21 today is Stephanie Hummon, representing Planet</p> <p>22 Depos. Would the reporter please swear in the</p>	<p>1 by anti-abortion folks and I want to protect my</p> <p>2 family.</p> <p>3 MS. MALARKEY: Okay. Can we make an</p> <p>4 agreement that you will provide his residential</p> <p>5 address for me off the record?</p> <p>6 MR. GREANEY: We can agree to provide an</p> <p>7 address at which he receives mail, as I -- as we</p> <p>8 discussed.</p> <p>9 THE WITNESS: That's fine.</p> <p>10 Q. You will agree to provide an address at</p> <p>11 which you receive mail currently?</p> <p>12 A. Yes.</p> <p>13 Q. Okay. And for how long has that address</p> <p>14 been the address at which you receive mail?</p> <p>15 A. I don't remember.</p> <p>16 Q. Is it a residential address that you will</p> <p>17 provide or a business --</p> <p>18 A. No.</p> <p>19 Q. -- address?</p> <p>20 A. It will be a mailing address.</p> <p>21 Q. A business address or a residential</p> <p>22 address?</p>
<p>1 witness.</p> <p>2 Whereupon,</p> <p>3 STEVEN C. BRIGHAM, M.D.,</p> <p>4 being first duly sworn or affirmed to testify to</p> <p>5 the truth, the whole truth, and nothing but the</p> <p>6 truth, was examined and testified as follows:</p> <p>7 EXAMINATION BY COUNSEL FOR PLAINTIFF</p> <p>8 BY MS. MALARKEY:</p> <p>9 Q. Okay, Dr. Brigham. Can you please state</p> <p>10 your full name and your current residential</p> <p>11 address.</p> <p>12 A. My full name is Steve Brigham. I don't</p> <p>13 want to reveal my present residential address.</p> <p>14 Q. Okay. Well, you understand that you're a</p> <p>15 defendant in the lawsuit that we're here today to</p> <p>16 speak about --</p> <p>17 A. Right.</p> <p>18 Q. -- correct?</p> <p>19 A. I do.</p> <p>20 Q. Okay. All right. What is the reason why</p> <p>21 you don't want to give your residential address?</p> <p>22 A. Because I've been targeted with violence</p>	<p>1 A. A mailing address.</p> <p>2 Q. Right. But is it a mailing address of a</p> <p>3 home or a P.O. box or a corporate location?</p> <p>4 A. A commercial mailbox.</p> <p>5 Q. Okay. And for how long have you been</p> <p>6 associated with the address of that corporate</p> <p>7 mailbox that you will provide?</p> <p>8 A. I don't remember.</p> <p>9 Q. Years? Months? Days?</p> <p>10 A. Years.</p> <p>11 Q. All right. What state is the address in?</p> <p>12 A. Connecticut.</p> <p>13 Q. Okay. And you've been affiliated with</p> <p>14 the address in Connecticut that you'll provide off</p> <p>15 the record for a number of years?</p> <p>16 A. Yes.</p> <p>17 Q. Do you have any intention of divesting</p> <p>18 yourself of any interest in that commercial address</p> <p>19 that you're going to provide later?</p> <p>20 A. No.</p> <p>21 Q. Okay. Do you own any residential</p> <p>22 property?</p>

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<p>1 A. Do I own it personally? 2 Q. Yeah. 3 A. Solely? 4 Q. No. No. You or with someone else. Do 5 you have any ownership in a property? 6 A. I have an ownership interest -- I have a 7 partial ownership interest in a residential 8 property, yes. 9 Q. Is that property located in the State of 10 Massachusetts? 11 A. No. 12 Q. When you signed an affidavit during 13 proceedings earlier in this litigation, I think 14 sometime this summer, you gave an address that you 15 stated you co-owned with your wife in 16 Massachusetts. 17 Do you recall that? 18 A. The -- I recall the address in 19 Massachusetts. 20 Q. Okay. Do you -- did you ever co-own a 21 residential property in Massachusetts with your 22 wife?</p>	<p>11 1 MR. GREANEY: Yes, we have. So you 2 can -- 3 THE WITNESS: Well, but this isn't 4 sealed, so my -- my wife is Krishni De Thabrew. 5 BY MS. MALARKEY: 6 Q. Okay. And, I'm sorry, what is her last 7 name, sir? I just didn't get all the letters. 8 A. De Thabrew. 9 Q. I don't want to say it wrong. 10 Ms. De Thabrew? 11 A. Yes. 12 Q. For how long has Ms. De Thabrew been your 13 wife? 14 A. Ten years. 15 Q. And if I understand what you've told me a 16 moment ago and the affidavit you signed earlier in 17 this case, you and Ms. De Thabrew have a homestead 18 co-interest in a residential property in 19 Massachusetts? 20 A. There was -- there was a residential 21 property in Massachusetts. 22 Q. Um-hum.</p>
<p>10 1 A. I -- I'm not sure. I had a homestead 2 interest. I'm not sure legally what that meant. 3 Q. Okay. Are you married today, sir? 4 A. Excuse me? 5 Q. Are you married today? 6 A. I am married. 7 Q. Who is your wife? 8 A. I don't want to reveal that. I don't see 9 that as relevant. My wife has nothing to do with 10 this case and I want to protect my wife. I'm 11 sorry. 12 Q. I understand that, sir. But, 13 unfortunately, only a judge can tell you not to 14 answer the questions. So, today, you do have to 15 answer my questions and -- 16 A. We've moved for this to be sealed to 17 protect my family and if the judge rules that I 18 have to reveal my wife's identity, I will, but I'm 19 not -- I personally don't -- 20 MR. GREANEY: Dr. Brigham, we've already 21 provided her identity in an affidavit in the case. 22 THE WITNESS: We have?</p>	<p>12 1 A. I believe it was titled in her name, 2 but -- and I don't -- I'm not an attorney, so I 3 don't understand the legal implications of this, 4 but under Massachusetts law, I remember I had to 5 sign something about my homestead interest in this 6 property in Massachusetts. 7 Q. Have you ever resided in the property in 8 Massachusetts? 9 A. Yes. 10 Q. Okay. Do you reside there now? 11 A. No. 12 Q. For how long did you reside in that -- in 13 that property in Massachusetts? 14 A. For about three years. 15 Q. Okay. From when to when, roughly? 16 A. From 2000 -- two and a half years maybe. 17 From 2012 until late 2016. 18 Q. Late last year? 19 A. Yes. 20 Q. About a year ago? 21 A. Yes. 22 Q. Okay. Do -- do you, or you and your wife</p>

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<p>13</p> <p>1 co-own or have any homestead or any other type of</p> <p>2 interest in any other residential property</p> <p>3 anywhere?</p> <p>4 A. Yes. There is a -- well, I don't --</p> <p>5 there's a property, which I think is in foreclosure</p> <p>6 now, but there is a property in New Jersey that</p> <p>7 we're -- I forget the word, but we join -- jointly</p> <p>8 own.</p> <p>9 Q. Okay. What is the address of the</p> <p>10 property in New Jersey that you jointly own that</p> <p>11 may or may not be in foreclosure?</p> <p>12 A. It's Corbridge Court in Voorhees,</p> <p>13 New Jersey.</p> <p>14 Q. 1094 Corbridge Court?</p> <p>15 A. I'm sorry, what did you say?</p> <p>16 Q. 1094 Corbridge Court.</p> <p>17 A. Yes.</p> <p>18 Q. In Voorhees?</p> <p>19 A. Yes. Yes. That's it.</p> <p>20 Q. For how long, approximately, have you had</p> <p>21 an ownership interest, either full or partial, in</p> <p>22 the Corbridge Court residential address?</p>	<p>15</p> <p>1 Q. Okay. Okay. You went to medical school</p> <p>2 at Columbia University?</p> <p>3 A. Yes, ma'am.</p> <p>4 Q. And can you tell me what you did</p> <p>5 education-wise or training-wise after you graduated</p> <p>6 from medical school?</p> <p>7 First of all, let me back up a second.</p> <p>8 What year did you graduate medical school?</p> <p>9 A. Let me think. I went to MIT as an</p> <p>10 undergraduate, and graduated from MIT in '78. And</p> <p>11 then I went to Columbia and I was in an M.D., Ph.D.</p> <p>12 program and graduated -- I got my M.D. degree in</p> <p>13 '86 and then I did a internship from '86 to '87.</p> <p>14 And then -- well, that was the last residency</p> <p>15 training I took, and then I started practicing</p> <p>16 medicine and working my Ph.D. and things like that.</p> <p>17 Q. Okay. So you -- you attained your M.D.</p> <p>18 degree in 1986?</p> <p>19 A. Yes.</p> <p>20 Q. And did you achieve your Ph.D.?</p> <p>21 A. I did not defend my -- I -- I got a</p> <p>22 master's -- master's degree in biochemistry, but I</p>
<p>14</p> <p>1 A. I don't remember.</p> <p>2 Q. Years?</p> <p>3 A. Years.</p> <p>4 Q. Decades?</p> <p>5 A. I don't think it's decades -- I'm not</p> <p>6 sure.</p> <p>7 Q. Okay.</p> <p>8 A. Many -- several years. I don't think</p> <p>9 it -- I don't know if it's reached decades, but --</p> <p>10 Q. So other than the Corbridge Court address</p> <p>11 in Voorhees, New Jersey, and the Massachusetts</p> <p>12 address, do you currently own any proper --</p> <p>13 residential property, with or without your wife?</p> <p>14 A. No.</p> <p>15 Q. Do you have any ownership interest</p> <p>16 currently in any commercial property?</p> <p>17 A. No.</p> <p>18 Q. Have you ever?</p> <p>19 A. No.</p> <p>20 Q. And when I say, you, I mean, personally,</p> <p>21 Steven C. Brigham.</p> <p>22 A. No, not that I remember, no.</p>	<p>16</p> <p>1 didn't defend my -- I didn't finish my dissertation</p> <p>2 because I started practicing medicine.</p> <p>3 Q. So the master's degree in biochemistry</p> <p>4 in -- I take it, that was from Columbia as well?</p> <p>5 A. Um-hum.</p> <p>6 Q. Yes? Sorry. You have to say yes because</p> <p>7 she can't write down um-hum.</p> <p>8 A. Yes.</p> <p>9 Q. Okay. What --</p> <p>10 A. The master's is from Columbia.</p> <p>11 Q. And what year did you achieve your</p> <p>12 master's degree?</p> <p>13 A. I don't remember. It was in the -- it</p> <p>14 was before my M.D.</p> <p>15 Q. Okay.</p> <p>16 A. It was between -- it was in the early</p> <p>17 '80s --</p> <p>18 Q. Okay.</p> <p>19 A. -- sometime.</p> <p>20 Q. So it went bachelor's degree, master's</p> <p>21 degree and then medical doctor?</p> <p>22 A. M.D.</p>

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<p>17</p> <p>1 Q. Allright. And so in terms of the Ph.D. 2 program, it sounds like you wrote a dis -- you got 3 all the way through writing the dissertation, you 4 just didn't -- 5 A. I didn't finish writing it. 6 Q. The internship from 1986 to 1987, that 7 was in internal medicine? 8 A. Internal medicine and emergency medicine. 9 There was a -- at the time, they didn't have 10 emergency medicine residencies. But I've -- I did 11 a lot of emergency medicine as a part of that 12 residency. 13 Q. And through what academic program was 14 your internship? 15 A. New York Medical College in Valhalla. 16 Q. And you -- I take it, you did not 17 complete that residency program? 18 A. I did. 19 Q. Okay. It was a one-year program? 20 A. It was a one-year program, right. 21 Q. A one-year internship program? 22 A. Right.</p>	<p>19</p> <p>1 with you at the same time -- 2 A. Right. 3 Q. -- did any of them continue on? 4 A. Well, you -- when you match -- 5 Q. Um-hum. 6 A. So I matched with a -- they're called -- 7 forget the words, it's been -- you're going back so 8 far. You can sign up -- you can match for a 9 one-year residency or you can ask to do -- it's 10 called a transitional or a -- I forget now what the 11 words are. But, anyway, some of the -- some of the 12 doctors who began the residency with me, like me, 13 matched for one year. And some wanted to go for 14 three years or -- well, it was three years at the 15 time. So the ones who did one year did one year, 16 as far as I know. And the ones who did three years 17 did three years. 18 Q. Okay. So when you applied, you applied 19 to do a one-year program and it was always your 20 intention to only do a one-year program? 21 A. Well, when I applied, and when I matched, 22 it was a one-year program, and that was a fixed</p>
<p>18</p> <p>1 Q. Okay. Did you participate at all in any 2 type of residency program ever? 3 A. Well, I mean, that's part of a 4 postgraduate residency, whatever you would call it. 5 Internship, residency, a PG one year, I did that. 6 And that's all I signed up for and that's all I 7 did. 8 Q. Right. I'm just trying to understand a 9 little bit because the kind of residencies I'm 10 familiar with are more than one year. So if I'm -- 11 if I'm following you, you signed up for a one-year 12 program, you did the one year, you completed the 13 program. 14 A. Correct. 15 Q. There was no -- when you initially 16 started the program, was there an expectation that 17 it would last more than just a year? 18 A. No. They invited me to stay and 19 continue, but I wanted to -- to finish the 20 residency -- to stay on. I only signed up for one 21 year and that's all I did. 22 Q. Okay. The other students who started</p>	<p>20</p> <p>1 one-year program. But my ultimate intentions 2 were -- beyond that, were unclear to me at the 3 time. 4 Q. What I'm asking you, though, is did 5 you -- did you apply for a three-year program? 6 A. No. 7 Q. Okay. Did you have any intention of 8 doing a resident -- 9 A. I was offered to stay to continue the 10 three-year program, but I didn't want to at the 11 time because I wanted to work on my Ph.D. 12 Q. Okay. You didn't stay on to complete the 13 remaining two years because you wanted to work on 14 your Ph.D.? 15 A. It wasn't remaining two years. They 16 offered me -- I only -- at the interview, they 17 wanted me to go for three years, but I didn't want 18 to do the whole three-year program because I wanted 19 to go and finish my Ph.D. And then what I would do 20 after that, I wasn't sure whether I would do 21 further residency training in internal medicine or 22 in some other specialty, or what I was going to do.</p>

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<p style="text-align: right;">21</p> <p>1 Q. All right. So in 1987, you finished your 2 internship and went back to working on your Ph.D.?</p> <p>3 A. Yes.</p> <p>4 Q. And were you working on your Ph.D. full 5 time or were you employed in the meantime?</p> <p>6 A. Well, after I finished my training -- 7 boy, you're going back to the '80s now -- I took a 8 vacation and then I started working on the Ph.D. 9 And then I got licensed. And then I needed to earn 10 an income because I didn't have any income. So 11 then I started working as a doctor.</p> <p>12 Q. At the same time you were also trying to 13 complete your Ph.D.? That was my original 14 question.</p> <p>15 A. At one point, I was working on them both, 16 yes.</p> <p>17 Q. Okay.</p> <p>18 A. I was practicing medicine and also 19 working on my Ph.D.</p> <p>20 Q. All right. Do you know what year you 21 became licensed as a doctor?</p> <p>22 A. I don't remember. '80 -- well, I don't</p>	<p style="text-align: right;">23</p> <p>1 apply for and received licensure to practice 2 medicine in the State of New York, right?</p> <p>3 A. Yes.</p> <p>4 Q. Okay. And at the same -- around the same 5 time, you're working on your Ph.D., right?</p> <p>6 A. Right.</p> <p>7 Q. Okay. Where were you working to earn a 8 paycheck, as you said?</p> <p>9 A. I started working -- I worked in 10 emergency rooms as an emergency physician. I 11 worked for Planned Parenthood in New York City, 12 Margaret Sanger Center. I worked for Flushing 13 Gynecology Center in Queens. I worked for All 14 Women's Medical Pavilion. I worked for a number of 15 places.</p> <p>16 Q. In and around New York City?</p> <p>17 A. Those are all -- most of them are in and 18 around New York City --</p> <p>19 Q. Okay.</p> <p>20 A. -- yes.</p> <p>21 Q. All right. Now --</p> <p>22 A. Some of the emergency rooms were out a</p>
<p style="text-align: right;">22</p> <p>1 remember exactly. The late '80s and I got -- I 2 think -- I don't remember the -- '88, maybe.</p> <p>3 Q. Okay. I won't hold you to it. Late '80s 4 is -- in the late '80s, the State of New York 5 licensed you to become a medical doctor?</p> <p>6 A. Yes.</p> <p>7 Q. Any other states that you applied for 8 licensure with, after you completed your internship 9 in 1987?</p> <p>10 A. What -- you asked me all of the states 11 that I've applied for licensure for?</p> <p>12 Q. Right now, I'm just trying to go 13 chronologically, if we can. If you need to skip 14 ahead, let me know. I'm just --</p> <p>15 A. Well, it blurs toge -- you're going --</p> <p>16 Q. Okay.</p> <p>17 A. -- back 30 years.</p> <p>18 Q. I understand.</p> <p>19 A. And some of the questions you ask, you're 20 asking questions that span more than one year, so 21 it's -- it's hard to go exactly chronologically.</p> <p>22 Q. Okay. So in 19 -- in the late '80s, you</p>	<p style="text-align: right;">24</p> <p>1 ways.</p> <p>2 Q. Were they in the New York City 3 metropolitan area?</p> <p>4 A. A couple of them weren't.</p> <p>5 Q. Where were the couple of them that 6 weren't?</p> <p>7 A. I worked at the United States Military 8 Academy at West Point. I worked at a hospital in 9 Ellenville, New York, in the Catskills. I don't 10 know if you know the geography. I worked at a -- I 11 forgot was that hospital -- Port Jervis, New York. 12 So that -- those are the ones -- those are the ones 13 that were not in the New York City area. The 14 others were in the New York City area.</p> <p>15 Q. Okay. I take it, you have never 16 completed any residency or fellowship program, 17 true?</p> <p>18 A. I have never completed a formal residency 19 training program.</p> <p>20 Q. Other than the one-year internship that 21 you told me about, have you participated in any 22 other residency or fellowship program ever?</p>

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<p>25</p> <p>1 A. Well, I did do training. I don't</p> <p>2 remember if it was called a fellowship, but I did a</p> <p>3 couple of -- I did various trainings, let's put it</p> <p>4 that way.</p> <p>5 Q. All right. Tell me what you mean by</p> <p>6 trainings.</p> <p>7 A. I did training with Planned Parenthood in</p> <p>8 New York City at All Women's Medical Pavilion. I</p> <p>9 worked with Jim McMahon, California. That would</p> <p>10 be -- Jim was more like a preceptorship. I'm</p> <p>11 trying to remember them all. With Carl Stave out</p> <p>12 in -- that was also more like a preceptorship.</p> <p>13 I tend -- took various courses.</p> <p>14 Q. Okay.</p> <p>15 A. Continuing medical education courses,</p> <p>16 went to meetings and that sort of thing.</p> <p>17 Q. Okay. So let me go back to my original</p> <p>18 question and then I'll ask about your training in</p> <p>19 more detail.</p> <p>20 Am I correct that you have never</p> <p>21 completed a residency or fellowship program,</p> <p>22 besides the one year that you told me about?</p>	<p>27</p> <p>1 A. So, first, I worked there as a physician.</p> <p>2 So the training began as they wanted to hire me to</p> <p>3 work for them. So before they hired me, they</p> <p>4 watched me and made sure I knew what I was doing.</p> <p>5 Then there was a doctor there who was the</p> <p>6 medical director, whose name I forget, who kind of</p> <p>7 worked one-on-one with me for a while, and was</p> <p>8 training me a little bit. And then they developed</p> <p>9 some kind of -- I don't know what they called it --</p> <p>10 course or some kind of a training program of some</p> <p>11 sort, which they held there anyway. But they</p> <p>12 already knew me because I was working for them</p> <p>13 regularly and they knew that I was working.</p> <p>14 So they enrolled -- so I enrolled in it,</p> <p>15 but I wanted to have some kind of a -- other, you</p> <p>16 know, other than these -- I don't know what the</p> <p>17 word -- preceptorships --</p> <p>18 Q. Um-hum.</p> <p>19 A. -- just documentation of training, so I</p> <p>20 did that.</p> <p>21 Q. Was the Planned Parenthood training that</p> <p>22 you're referring to a formal training program?</p>
<p>26</p> <p>1 A. I'm not -- I'll agree that I haven't</p> <p>2 completed a formal residency training program.</p> <p>3 Whether those trainings that I got would be</p> <p>4 considered a fellowship -- they're not a formal</p> <p>5 fellowship as in -- which is referred to sometimes</p> <p>6 by -- sometimes subspecialty training is called a</p> <p>7 fellowship.</p> <p>8 Q. Um-hum.</p> <p>9 A. But some of these -- one of the -- I'm</p> <p>10 not sure if the word fellowship was used for any of</p> <p>11 these programs. I'm not sure if I want to agree</p> <p>12 that I've never done a fellowship, but I've</p> <p>13 certainly never finished a residency.</p> <p>14 Q. Right. Have you ever been</p> <p>15 Board-certified by any medical board?</p> <p>16 A. No.</p> <p>17 Q. All right. Now, tell me about the</p> <p>18 training that you did through Planned Parenthood.</p> <p>19 How long was it? Where was it? What'd you do?</p> <p>20 A. Wow. Going back so long ago. It was at</p> <p>21 the Margaret Sanger Center.</p> <p>22 Q. Um-hum.</p>	<p>28</p> <p>1 A. It was a formal program of --</p> <p>2 Q. Okay.</p> <p>3 A. -- Planned Parenthood.</p> <p>4 Q. Not just on-the-job training, but</p> <p>5 something you had to sign up for and there was a --</p> <p>6 A. Yeah, I signed --</p> <p>7 Q. -- curriculum?</p> <p>8 A. -- up for it and all that, I don't --</p> <p>9 yeah.</p> <p>10 Q. How long was the training through</p> <p>11 Planned Parenthood?</p> <p>12 A. I don't remember.</p> <p>13 Q. Who was the person who was training you</p> <p>14 through Planned Parenthood?</p> <p>15 A. His -- he was the medical director, but I</p> <p>16 forgot his name.</p> <p>17 Q. Okay.</p> <p>18 A. I mean, this -- you're going back</p> <p>19 30 years ago.</p> <p>20 Q. I understand.</p> <p>21 A. Okay.</p> <p>22 Q. Then you mentioned Dr. McMahon in</p>

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<p style="text-align: right;">29</p> <p>1 California. Who's he?</p> <p>2 A. He was a doctor that -- well-known</p> <p>3 physician who did -- performed pregnancy</p> <p>4 termination procedures, and that's who he is.</p> <p>5 Q. And was your -- you've referred to your</p> <p>6 training with Dr. McMahon as a preceptorship, so</p> <p>7 I'm going to use that word. Was your preceptorship</p> <p>8 with Dr. McMahon before or after the</p> <p>9 Planned Parenthood training?</p> <p>10 A. I can't -- I don't -- I think it was</p> <p>11 afterwards because this was for late -- late</p> <p>12 procedures.</p> <p>13 Q. Okay.</p> <p>14 A. He was doing -- he was doing cases beyond</p> <p>15 24 weeks.</p> <p>16 Q. Okay. And did you actually go to</p> <p>17 California to receive training from Dr. McMahon?</p> <p>18 A. Yes.</p> <p>19 Q. How long was the training with</p> <p>20 Dr. McMahon?</p> <p>21 A. I don't remember. Several months.</p> <p>22 Q. So he was teaching you how to -- how to</p>	<p style="text-align: right;">31</p> <p>1 Q. Okay.</p> <p>2 A. Yeah.</p> <p>3 Q. So other --</p> <p>4 A. Go ahead.</p> <p>5 Q. Other than the training that you did</p> <p>6 through Planned Parenthood in New York City and the</p> <p>7 two preceptorships you've mentioned to me in</p> <p>8 California and in Harrisburg, Pennsylvania, with</p> <p>9 Drs. McMahon and Stave, have you done any other --</p> <p>10 A. Training.</p> <p>11 Q. -- training after you finished your</p> <p>12 resident -- I'm sorry, your internship in 1987?</p> <p>13 A. Yes. Yes. I trained with Dr. Den.</p> <p>14 Q. Who -- how do you spell that, D-e-h-n?</p> <p>15 A. His real -- his full name is</p> <p>16 Dr. Dengel -- Dengelegi, D-e-n-g-e-l-e-g-i, or</p> <p>17 something like that, Dengelegi --</p> <p>18 Q. Um-hum.</p> <p>19 A. But everybody calls him Dr. Den, D-e-n.</p> <p>20 I don't know -- don't hold me to the spelling. I</p> <p>21 could be wrong about that.</p> <p>22 Q. Who is he?</p>
<p style="text-align: right;">30</p> <p>1 perform terminations of pregnancies after 24 weeks?</p> <p>2 A. Yes.</p> <p>3 Q. And you mentioned Dr. Carl -- I missed</p> <p>4 his last name -- Stade?</p> <p>5 A. Stave.</p> <p>6 Q. How do you spell his last name?</p> <p>7 A. S-t-a-v-e.</p> <p>8 Q. And where is Dr. Stave, or was Dr. Stave?</p> <p>9 A. Dr. Stave worked in Harrisburg,</p> <p>10 Pennsylvania, and I went and trained with him.</p> <p>11 Q. For how long?</p> <p>12 A. A year maybe.</p> <p>13 Q. And what was the nature of your training</p> <p>14 with Dr. Stave?</p> <p>15 A. We would do -- it was training for doing</p> <p>16 pregnancy termination procedures and office</p> <p>17 gynecology.</p> <p>18 Q. And do you recall whether your training</p> <p>19 or preceptorship with Dr. Stave was before or after</p> <p>20 your training with Dr. McMahon in California?</p> <p>21 A. I don't remember the sequence. I don't</p> <p>22 remember which. I think it was before.</p>	<p style="text-align: right;">32</p> <p>1 A. He was a doctor who -- I think he was a</p> <p>2 professor. He had some kind of affiliation with</p> <p>3 Mount Sinai, and he worked with me at Flushing</p> <p>4 Gynecology Center and he was -- he was my first --</p> <p>5 well, not counting training I had before that, but</p> <p>6 he was the -- my first mentor, I guess you would</p> <p>7 say, in doing D&E procedures.</p> <p>8 Q. Okay. So you think that your training</p> <p>9 with Dr. Den was before you trained with</p> <p>10 Dr. McMahon and Dr. Stave?</p> <p>11 A. Yes.</p> <p>12 Q. Okay. And, I'm sorry --</p> <p>13 A. I think it was even before</p> <p>14 Planned Parenthood.</p> <p>15 Q. Okay. I think I forgot to ask you, the</p> <p>16 nature of your training with Dr. Stave was what?</p> <p>17 A. One on -- all of these are one-on-one</p> <p>18 seeing patients there --</p> <p>19 Q. Okay.</p> <p>20 A. -- in the room together, doing</p> <p>21 procedures.</p> <p>22 Q. Okay.</p>

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<p>33</p> <p>1 A. Dr. Stave --</p> <p>2 Q. And when you say--</p> <p>3 A. -- didn't do late cases. He -- but it</p> <p>4 was -- it was interesting to train with each of</p> <p>5 these doctors because they all had different</p> <p>6 perspectives and you learned something every time</p> <p>7 you went with one of them.</p> <p>8 Q. Okay. So -- so is it fair to say that</p> <p>9 Dr. Den and Dr. Stave were -- your training with</p> <p>10 those two doctors was on termination of pregnancy?</p> <p>11 A. And gynecology.</p> <p>12 Q. Okay.</p> <p>13 A. Office gynecology. Yeah. All of this</p> <p>14 training is for termination of pregnancy --</p> <p>15 Q. Okay.</p> <p>16 A. -- office gynecology. None of this</p> <p>17 training that I'm talking about is -- aside from my</p> <p>18 emergency room work, is -- none of this is -- is --</p> <p>19 this is all pregnancy termination, office</p> <p>20 gynecology.</p> <p>21 Q. All right. So we've talked about Planned</p> <p>22 Parenthood, Dr. McMahon, Dr. Stave, Dr. Den. Any</p>	<p>35</p> <p>1 Q. I think it was the College of Medicine</p> <p>2 and Dentistry before it changed to Rutgers, but --</p> <p>3 A. I don't know.</p> <p>4 Q. -- when you were there, it was College of</p> <p>5 Medicine and Dentistry.</p> <p>6 A. I -- he was a professor there.</p> <p>7 Q. Okay.</p> <p>8 A. You know where I'm talking about.</p> <p>9 Q. I do. All right. So -- and</p> <p>10 Dr. Burnhill, was he -- where was he in the</p> <p>11 chronology of the other doctors, if you recall?</p> <p>12 A. He was later. He was -- he came in --</p> <p>13 yeah, he came in -- he came in later. He was more</p> <p>14 of a -- by that time, by the time Dr. Burnhill, I</p> <p>15 was trained and I was doing cases, I had done</p> <p>16 thousands of cases and he came in like as a</p> <p>17 consultant and was advising me on every -- the --</p> <p>18 everything; the aspect of the practice and watching</p> <p>19 the technique and watching the procedures.</p> <p>20 And he -- he -- he testified for me, I</p> <p>21 think, as an expert witness when my licensing</p> <p>22 hearings --</p>
<p>34</p> <p>1 other training that you have had since -- ever</p> <p>2 since finishing your internship in 1987?</p> <p>3 A. Dr. Burnhill.</p> <p>4 Q. Who is -- what's his first name?</p> <p>5 A. Michael Burnhill.</p> <p>6 Q. Do you know Dr. Den's first name?</p> <p>7 A. Tiberias.</p> <p>8 Q. Hard to forget.</p> <p>9 A. Right.</p> <p>10 Q. And Dr. Burnhill, B-u-r-n-h-i-l-l?</p> <p>11 A. Yes, ma'am.</p> <p>12 Q. Where is he?</p> <p>13 A. He -- well, he's, I think, deceased now.</p> <p>14 Q. Okay. Where was he when you were</p> <p>15 training with him?</p> <p>16 A. He was the medical director of the</p> <p>17 Planned Parenthood Federation of America and he was</p> <p>18 also a professor of obstetrics and gynecology at</p> <p>19 Rutgers -- University of Medicine and Dentistry in</p> <p>20 New Jersey.</p> <p>21 Q. Um-hum. Before it was Rutgers?</p> <p>22 A. Yeah. I don't know which it was when.</p>	<p>36</p> <p>1 Q. Um-hum.</p> <p>2 A. He had been a consultant for the</p> <p>3 New Jersey board in their -- developing their</p> <p>4 pregnancy termination regulations, so --</p> <p>5 I had actually consulted with him about</p> <p>6 the New Jersey regulations and this whole question</p> <p>7 of this area even before that, anyway.</p> <p>8 Q. All right. So other than Planned</p> <p>9 Parenthood, Dr. McMahon, Stave, Den, Burnhill, any</p> <p>10 other training that you've received since your</p> <p>11 internship in 1987?</p> <p>12 A. Well, I'm forgetting somebody, I know.</p> <p>13 You mean training in pregnancy termination and</p> <p>14 office gynecology?</p> <p>15 Q. Any type of medical training.</p> <p>16 A. Well, there's -- I have attended many</p> <p>17 conferences and CME courses and all that sort of</p> <p>18 stuff, if that's what you mean.</p> <p>19 Q. I don't mean continuing education. I</p> <p>20 mean, postgraduate training or education. Not just</p> <p>21 a one-day or two-day seminar, but --</p> <p>22 A. Well, some of these are a weeklong</p>

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<p>37</p> <p>1 things, but courses. I did courses.</p> <p>2 Q. What courses?</p> <p>3 A. Oh, a lot. The American College of</p> <p>4 Obstetricians and Gynecologists has a number of</p> <p>5 courses. I can't even remember all the --</p> <p>6 Q. Okay.</p> <p>7 A. -- ones I took.</p> <p>8 Q. You're talking about medical courses that</p> <p>9 any -- any doctor could sign up for?</p> <p>10 A. Any --</p> <p>11 Q. Okay.</p> <p>12 A. -- doctor could sign up for.</p> <p>13 Q. Any type of program, training program</p> <p>14 that you had to apply for?</p> <p>15 A. To apply for? Well, you had to apply for</p> <p>16 the Planned Parenthood program. I can't</p> <p>17 remember --</p> <p>18 Q. Okay.</p> <p>19 A. -- any.</p> <p>20 Q. And it --</p> <p>21 A. There may be something, but --</p> <p>22 Q. And it sounds like the Planned Parenthood</p>	<p>39</p> <p>1 A. No. Dr. Burnhill, for example, I sought</p> <p>2 out, because he was considered preeminent authority</p> <p>3 in the field and he was near me, and so I wanted --</p> <p>4 I sought him --</p> <p>5 Q. Okay.</p> <p>6 A. -- you know --</p> <p>7 Q. How about the others --</p> <p>8 A. -- to be a preceptorship.</p> <p>9 Q. -- Dr. McMahon, Stave and Den, did you</p> <p>10 seek them or did you --</p> <p>11 A. Dr. McMahon, I sought.</p> <p>12 Q. Hold on. All right. Sorry. I know it</p> <p>13 gets very conversational because you know exactly</p> <p>14 what I'm going to ask you, but for her sake, we</p> <p>15 have to wait until I finish asking --</p> <p>16 A. Okay.</p> <p>17 Q. -- the question and then you answer and</p> <p>18 I'll try to --</p> <p>19 A. Dr. -- both Dr. McMahon and Dr. Burnhill,</p> <p>20 I had heard speak as speakers --</p> <p>21 Q. Um-hum.</p> <p>22 A. -- at conferences.</p>
<p>38</p> <p>1 training program that we discussed earlier is -- is</p> <p>2 the only formal training program that had a</p> <p>3 curriculum and things like -- and a timeline. From</p> <p>4 what you're describing, it sounds to me like your</p> <p>5 preceptorships, as you've described them with the</p> <p>6 various doctors we've talked about, are more</p> <p>7 informal on-the-job training programs, not --</p> <p>8 A. I wouldn't -- that's -- they're a little</p> <p>9 more than that.</p> <p>10 Q. Okay.</p> <p>11 A. You said informal.</p> <p>12 Q. Well, I mean --</p> <p>13 A. But they're one-on-one preceptorships.</p> <p>14 Q. Okay. What I would like to know is did</p> <p>15 Dr. -- did the doctors that you've mentioned, did</p> <p>16 they advertise that they were going to do a</p> <p>17 preceptorship and accept applications from a</p> <p>18 variety of people and --</p> <p>19 A. No.</p> <p>20 Q. -- choose you?</p> <p>21 A. No.</p> <p>22 Q. Okay.</p>	<p>40</p> <p>1 Q. Um-hum.</p> <p>2 A. And they were both considered preeminent</p> <p>3 experts in their field, so I sought them out.</p> <p>4 Q. Okay.</p> <p>5 A. Dr. Den was also a preeminent expert. He</p> <p>6 was -- he was a, like I said, I think he was</p> <p>7 professor of obstetrics and gynecology at Mount</p> <p>8 Sinai, but he also happened to be medical director,</p> <p>9 I think, was his title of Flushing. And I was</p> <p>10 hired on as a doctor there, so I was under him. He</p> <p>11 was like my boss. Same thing with the -- with the</p> <p>12 Planned Parenthood doctor -- before I took the</p> <p>13 Planned Parenthood course, the doctor, whose name</p> <p>14 I'm blanking, was my boss. So these were both -- I</p> <p>15 was a direct -- they were my direct supervisors --</p> <p>16 Q. Okay.</p> <p>17 A. -- and they were -- so I guess it was</p> <p>18 their responsibility to train me. But Dr. -- the</p> <p>19 doc -- the doctor at Planned Parenthood, it was his</p> <p>20 responsibility to train me, or to verify that I</p> <p>21 was -- by the time I was working at Planned</p> <p>22 Parenthood, I think he watched me to make -- he</p>

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<p style="text-align: right;">41</p> <p>1 wanted to do his due diligence to make sure I was 2 competent and that I could safely perform 3 procedures before they would let me see patients. 4 And he sort of watched over what we did and 5 whatnot. Dr. -- but Dr. Den did more than that. 6 He took me on like as a preceptor and taught me to 7 do the D&E procedures, which are complicated 8 procedures. 9 Q. But none of the physicians that we've 10 been discussing had a formal training program for 11 which they took applications from a number of 12 doctors and chose from a variety of applicants, 13 correct? 14 A. Well, I can't -- Dr. Burnhill -- I don't 15 know. Yes, he very well may have, both as his -- 16 as he -- he was very preeminent in the field. 17 Perhaps, the preeminent doctor in the whole field, 18 as -- both as the national medical director of 19 Planned Parenthood and as professor of obstetrics 20 and gynecology. So I don't -- I know he was -- I 21 know he was involved in the OB/GYN residency 22 training program and in accepting people. So he</p>	<p style="text-align: right;">43</p> <p>1 was -- so I -- I sought him out to help me. 2 Q. When you did your internal medicine and 3 emergency room medicine internship through the New 4 York Medical College, that was a program that you 5 applied for and you matched and you were accepted? 6 A. Um-hum. 7 Q. And you completed the program, right? 8 A. Correct. 9 Q. Okay. Since that program, have you ever 10 gone through another process where you have 11 submitted an application for a training program or 12 medical educational program that you were one of a 13 number of applicants and had to be chosen or 14 selected for? 15 A. Planned Parenthood. 16 Q. Any others? 17 A. Well, there've been a number of courses 18 where you would apply and you had to be accepted, 19 which I've taken. I don't know how selective they 20 were, but I mean, most of these are like continuing 21 medical education courses like the American College 22 of OB/GYN.</p>
<p style="text-align: right;">42</p> <p>1 was involved in -- and I -- I don't know all of his 2 activities, but -- 3 Q. You -- sir, you indicated to me that you 4 sought out Dr. Burnhill -- 5 A. Yes. 6 Q. -- because of his expertise. 7 A. Yes. 8 Q. Okay. He did not have a program that you 9 applied for and he chose you from a variety of 10 applicants, true? 11 A. He had -- first of all, I don't know 12 what -- all what programs he had -- 13 Q. Um-hum. 14 A. -- and -- and what his role. He did many 15 things, which I'm not fully aware of all of them. 16 So I believe he was involved in some programs that 17 accepted applicants, but I didn't come to him 18 through one of those -- 19 Q. Okay. 20 A. -- kind of programs. I specifically 21 targeted him. He was -- I mean, I was trying to 22 improve, as best I can as a physician, and he</p>	<p style="text-align: right;">44</p> <p>1 Q. I'm not talking about courses. I'm 2 talking about training programs where you applied 3 and a number of other doctors applied -- 4 A. Well, the course might be considered a 5 training. 6 Q. Okay. I'm not talking about continuing 7 medical education courses that are put on through 8 ACOG or the -- any other member institution like 9 the ABA. I'm talking about -- 10 A. The ABA? 11 Q. I'm sorry. I'm in law. The AMA. 12 A. The American Basketball Association. 13 Q. No. No. 14 A. You a basketball fan? 15 MR. GREANEY: Yeah. 16 Q. We think of it as the Bar Association. 17 I'm talking about -- 18 A. Oh, the Bar Association. 19 Q. -- the AMA or ACOG. I'm talking about 20 training programs that you apply for, go through an 21 application process and that you were accepted for 22 and then start and finish. Since your internship,</p>

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<p style="text-align: right;">45</p> <p>1 have you done that?</p> <p>2 A. I'm sorry. Well, yes. I mean, there was</p> <p>3 the Planned Parenthood program. And then I'm not</p> <p>4 sure, some of these other things, whether they</p> <p>5 qualify as what you're describing. Yes, I think</p> <p>6 you have to apply for them and you do have to be</p> <p>7 accepted into some of these courses.</p> <p>8 Now, so the courses I'm describing what</p> <p>9 might be considered training, they're not residency</p> <p>10 training, they're not fellow -- they're not</p> <p>11 fellowships. But I think you apply and you have to</p> <p>12 attend and you complete and you get a certificate.</p> <p>13 And I've done many of those.</p> <p>14 Q. Okay. Are you a member of ACOG?</p> <p>15 A. I am not a fellow of the American College</p> <p>16 of OB/GYN.</p> <p>17 Q. Have you ever been?</p> <p>18 A. A fellow?</p> <p>19 Q. Yeah.</p> <p>20 A. No.</p> <p>21 Q. Are you eligible to be a fellow?</p> <p>22 A. They have a category -- well, I don't</p>	<p style="text-align: right;">47</p> <p>1 A. '94.</p> <p>2 Q. Do you currently have any active medical</p> <p>3 licenses in any state?</p> <p>4 A. No.</p> <p>5 Q. Have they all been revoked?</p> <p>6 A. No.</p> <p>7 Q. Okay. All right. So then let's talk</p> <p>8 about them individually. When your medical license</p> <p>9 was revoked in 1994, in New York, what -- why was</p> <p>10 that?</p> <p>11 A. That's a long story.</p> <p>12 Q. Give me the short version.</p> <p>13 A. My version, or their version? Because</p> <p>14 those are different versions.</p> <p>15 Q. What is your understanding as to why your</p> <p>16 medical license was revoked by the State of</p> <p>17 New York in 1994?</p> <p>18 A. I did two second trimester pregnancy</p> <p>19 termination procedures. Both of these procedures</p> <p>20 had known and accepted complications. One was a</p> <p>21 uterine perforation and one was a cervical</p> <p>22 laceration. I believe I handled them</p>
<p style="text-align: right;">46</p> <p>1 know now because my -- my license has been revoked,</p> <p>2 but they had -- at least they have some kind of</p> <p>3 category --</p> <p>4 Q. Um-hum.</p> <p>5 A. -- for non-OB/GYNs, which I don't -- I'm</p> <p>6 not sure if I was -- was a -- was qualified for or</p> <p>7 not. But I'm not -- I'm not -- I didn't complete</p> <p>8 an OB/GYN residency training program.</p> <p>9 Q. Um-hum. Tell me all the states in which</p> <p>10 you have ever had a medical license.</p> <p>11 A. New York. New Jersey. Pennsylvania.</p> <p>12 California. Florida. And Georgia. I think that's</p> <p>13 it.</p> <p>14 Q. You ever had a medical license in</p> <p>15 Maryland or Virginia?</p> <p>16 A. No.</p> <p>17 Q. How about Delaware?</p> <p>18 A. No.</p> <p>19 Q. Okay. Your New York license, that has</p> <p>20 been revoked?</p> <p>21 A. Yes.</p> <p>22 Q. As of when?</p>	<p style="text-align: right;">48</p> <p>1 appropriately. Both patients are alive and well</p> <p>2 today. Both patients had known and accepted</p> <p>3 complications.</p> <p>4 We called the chairman of -- the national</p> <p>5 medical director of Planned Parenthood Federation</p> <p>6 of America, Michael Policar, to testify as an</p> <p>7 expert, who said he had the same exact complication</p> <p>8 with the same exact outcomes and his care wouldn't</p> <p>9 have been any different than mine.</p> <p>10 However, the state alleged that I</p> <p>11 mishandled -- effectively, that I mishandled the</p> <p>12 complications. And we were put in front of a panel</p> <p>13 that was selected by the state, which was headed by</p> <p>14 a perinatologist, who informed our attorney that he</p> <p>15 didn't think these procedures should be legal and</p> <p>16 the procedures should be criminal from the</p> <p>17 beginning. He wanted to dismiss Dr. Policar out of</p> <p>18 hand because he did abortions, so, obviously, he's</p> <p>19 not an expert in doing abortions and so they</p> <p>20 rejected our expert's testimony.</p> <p>21 They made a finding that it was gross</p> <p>22 negligence for me to even do the procedure, even</p>

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<p style="text-align: right;">49</p> <p>1 though that allegation wasn't charged and wasn't 2 defended and then they said that everything that 3 flows from that is, you know -- and then they went 4 on to just find everything was wrong -- 5 Q. Okay. 6 A. -- with what I did. 7 Q. So the termination of your license in 8 New York in '94 dealt with, generally speaking, 9 complications that arose in two -- two different 10 patients? 11 A. So two patients. 12 Q. Okay. How about in New Jersey, when did 13 you -- when was your license in New Jersey revoked? 14 A. In 2014. 15 Q. And what are the circumstances 16 surrounding the revocation of your license in 17 New Jersey in 2014? 18 A. New Jersey alleged that I violated the 19 law of Maryland. 20 Q. Um-hum. And did that deal with the 21 patient who -- whose termination started in 22 New Jersey and she drove to Maryland to have the</p>	<p style="text-align: right;">51</p> <p>1 they did. 2 Q. I'm sure. You've -- but you've never 3 been licensed in Maryland? 4 A. No. Never licensed in Maryland. That 5 was the whole -- 6 Q. Um-hum. 7 A. -- point, that I was engaging in 8 consultation with a Maryland licensed physician. 9 Q. Allright. Pennsylvania, when was your 10 license in Pennsylvania revoked? 11 A. It was not revoked. 12 Q. Okay. Is your -- you told me, at one 13 point, you did have a license in Pennsylvania, 14 correct? 15 A. I still have a license in Pennsylvania. 16 Q. Oh, I'm sorry. I misunderstood. I 17 thought I asked you if you still had any medical 18 license anywhere in any state. I thought -- 19 A. You said active. 20 Q. Okay. 21 A. I don't have an active license. 22 Q. Okay.</p>
<p style="text-align: right;">50</p> <p>1 completion of the termination? 2 A. There were a number of patients. I mean, 3 the -- I gave you the short -- 4 Q. Right. 5 A. -- version. There were multiple 6 allegations -- 7 Q. Okay. 8 A. -- in that revocation. I can go through 9 them all, if you want or -- how fast or short you 10 want. But the central allegation, at least in the 11 view of my attorneys -- 12 Q. Um-hum. 13 A. -- was that, although Maryland never 14 accused me of violating Maryland law, New Jersey 15 did -- what did they say -- because Maryland 16 changed the law three years after I was doing this, 17 the New Jersey administrative law judge took the 18 2012 or '13 law and applied it backwards in time to 19 2009 and said that, based on that, I had violated 20 Maryland law. 21 Q. Okay. 22 A. Which we think is unfair, but that's what</p>	<p style="text-align: right;">52</p> <p>1 A. But my license has not been revoked. I 2 have an inactive license. 3 Q. All right. If you wanted to make your 4 Pennsylvania license active today, would you be 5 eligible to do so, as you understand it? 6 A. Well -- excuse me. According to my 7 lawyers, on the one hand, I would be legally 8 eligible to do that. 9 Q. Um-hum. 10 A. They also said that, given all the 11 disciplinary action that has occurred since that 12 time -- did they say snowball's chance in hell? 13 Something like that. 14 Q. Okay. 15 A. They had a very -- although, legally, I 16 guess I could apply and am eligible, to answer your 17 question, they said -- 18 Q. Okay. 19 A. -- since I don't have any money to pay 20 any legal fees and it would be a big waste of time 21 to -- 22 Q. Okay.</p>

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<p style="text-align: right;">53</p> <p>1 A. -- try to do that.</p> <p>2 Q. Have you ever had any disciplinary</p> <p>3 proceedings against your medical license in the</p> <p>4 State of Pennsylvania?</p> <p>5 A. No.</p> <p>6 Q. Okay.</p> <p>7 A. No. I take that back. After -- oh, no,</p> <p>8 there were no final disciplinary actions.</p> <p>9 Q. Was any disciplinary action ever</p> <p>10 initiated against your license in Pennsylvania?</p> <p>11 A. Yes.</p> <p>12 Q. When?</p> <p>13 A. Boy, I'm going to -- this was -- this was</p> <p>14 after -- this was in -- I don't remember the exact</p> <p>15 year. I want to say '99, 2000, 2001.</p> <p>16 Q. Okay. And what was the nature of the</p> <p>17 proceeding?</p> <p>18 A. The nature of the proceeding was that</p> <p>19 they made a motion to revoke my -- revoke my</p> <p>20 Pennsylvania license, based upon action in</p> <p>21 New York, but then that was -- then Pennsylvania</p> <p>22 withdrew that or dismissed it, or it went away, so</p>	<p style="text-align: right;">55</p> <p>1 the --</p> <p>2 Q. Um-hum.</p> <p>3 A. So New Jersey retried those same two</p> <p>4 cases and came up with the opposite decisions, I</p> <p>5 did nothing wrong, my care met acceptable standards</p> <p>6 of care. So New York -- California was confronted</p> <p>7 with opposing decisions, if you will; new York,</p> <p>8 which said I was horrible and terrible and did</p> <p>9 everything wrong; and New Jersey, which said I did</p> <p>10 nothing wrong. So California offered me some kind</p> <p>11 of a consent agreement, which I don't remember the</p> <p>12 terms of, and I signed it.</p> <p>13 Q. Okay. So you -- you -- whatever the</p> <p>14 terminology is, you voluntarily agreed not to</p> <p>15 practice medicine in California and to --</p> <p>16 A. I volunteer --</p> <p>17 Q. -- surrender your license?</p> <p>18 A. Oh, no, no, no. I never surrendered the</p> <p>19 license.</p> <p>20 Q. Okay.</p> <p>21 A. I voluntarily agreed to do a number of</p> <p>22 things before I could practice there. I had to</p>
<p style="text-align: right;">54</p> <p>1 nothing occurred.</p> <p>2 Q. Is that talking -- referring back to the</p> <p>3 action in New York that had been taken against your</p> <p>4 New York license in the mid '90s?</p> <p>5 A. I don't remember exactly.</p> <p>6 Q. But it was dropped? Whatever it was, it</p> <p>7 was dropped?</p> <p>8 A. Whatever it was -- they started something</p> <p>9 and they dropped it.</p> <p>10 Q. Okay. How about California, was any</p> <p>11 disciplinary action ever taken against your</p> <p>12 California license?</p> <p>13 A. Yes.</p> <p>14 Q. When?</p> <p>15 A. In the '90s.</p> <p>16 Q. What was the nature of that disciplinary</p> <p>17 action?</p> <p>18 A. New York had revoked my license --</p> <p>19 Q. Um-hum.</p> <p>20 A. -- based on the allegations that I said.</p> <p>21 And then New Jersey had retried -- remember those</p> <p>22 two cases I told you about, the New York with</p>	<p style="text-align: right;">56</p> <p>1 take a course and I had to be under probation. I</p> <p>2 had to be under whatnot -- a number of things.</p> <p>3 That's the first thing California did. Then --</p> <p>4 that was when they had the two opposing decisions.</p> <p>5 Then when New Jersey -- suspended my</p> <p>6 license? They suspended my license before they</p> <p>7 revoked it in the 2000 -- 2010s. California, I</p> <p>8 think, suspended it in reciprocal action, and then</p> <p>9 I didn't renew it.</p> <p>10 Q. Okay.</p> <p>11 A. And then it -- it --</p> <p>12 Q. Okay.</p> <p>13 A. -- it --</p> <p>14 Q. Okay.</p> <p>15 A. Well, it went away administratively. It</p> <p>16 wasn't -- I didn't lose my license because of --</p> <p>17 they didn't revoke my license. I didn't -- I just</p> <p>18 didn't renew it.</p> <p>19 Q. So in 2000 --</p> <p>20 A. That's my memory of it. It's kind of</p> <p>21 complicated.</p> <p>22 Q. In 2010, when New Jersey suspended your</p>

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<p style="text-align: right;">57</p> <p>1 license before -- before it was ultimately revoked 2 by New Jersey in 2014, at the same time, in 2010, 3 California suspended your license in a reciprocal 4 license? 5 A. I -- you know -- it's all blurry. I 6 don't remember exactly the -- I know that -- no. I 7 may take that back because California then offered 8 me a second -- a second thing where -- a second 9 consent agreement, which had more restrictive terms 10 and conditions than the first one. I can't 11 remember the -- 12 Q. Okay. 13 A. -- details and I'm under oath. I want 14 to -- I don't want to say the wrong thing and -- 15 and -- but there were two agreements. Ultimately, 16 I didn't renew the license. The truth is, I never 17 practiced there ever since Jim McMahon and all that 18 stuff. 19 Q. Okay. 20 A. And so I just never renewed the license. 21 Q. Not -- 22 A. And I didn't want -- I didn't want -- I</p>	<p style="text-align: right;">59</p> <p>1 action, based upon the original New York 2 revocation. 3 Q. Okay. And how about Georgia? 4 A. Georgia, there was no disciplinary 5 action. I didn't -- I was -- if I remember right, 6 and, you know, I've got to be careful because I'm 7 saying all this -- I'm saying this under oath, but 8 I'm trying to be cooperative, so please don't hold 9 me to exactly this stuff because I could be wrong 10 about some of these -- the exact details. But my 11 memory of Georgia was that I was licensed there and 12 it was -- and I didn't renew it. It was -- and 13 they called it -- I don't know. I didn't renew it. 14 Q. It lapsed? 15 A. Yeah. 16 Q. Okay. 17 A. I think they said it was administratively 18 revoked was their words, but it was not a 19 disciplinary action. It was -- I didn't renew it, 20 in essence. I don't have a Georgia license. 21 Can we take a five-minute break? 22 MS. MALARKEY: Sure.</p>
<p style="text-align: right;">58</p> <p>1 didn't -- I would have also had to hire lawyers, I 2 didn't have any money and it was a big mess. 3 Q. Notwithstanding the hiring of lawyers and 4 the money, are you eligible to renew your license 5 or reinstate your license in California today? 6 A. Am I eligible? I don't know. 7 Q. Okay. 8 A. That's a good question. I hadn't thought 9 about it. 10 Q. So I take it, you have no intention of 11 doing that right now? 12 A. I don't -- look, whether I'm legally 13 eligible or whether I'm able to do it -- 14 Q. Um-hum. 15 A. -- it's kind of like Pennsylvania, you 16 know -- 17 Q. Um-hum. 18 A. -- you're asking me whether I'm legally 19 eligible, I'm not sure whether -- I am -- don't 20 have the money and I don't plan on doing it. 21 Q. How about Florida? 22 A. Florida revoked my license in reciprocal</p>	<p style="text-align: right;">60</p> <p>1 THE WITNESS: Just for a second. 2 MS. MALARKEY: Yep. 3 THE WITNESS: This is a good time. 4 THE VIDEOGRAPHER: We're going off the 5 record, the time is 10:30 a.m. 6 (Recess taken.) 7 THE VIDEOGRAPHER: We are back on the 8 record, the time is 10:35 a.m. 9 BY MS. MALARKEY: 10 Q. Okay. Doctor, a while ago, you mentioned 11 that you had worked for the U.S. Military Academy 12 at West Point. What did you do for the U.S. 13 Military Academy and when did you do it? 14 A. I worked in the emergency room as an 15 emergency room physician at Keller Army Community 16 Hospital at -- at the U.S. Military Academy in 17 West Point. And I also covered the hospital at 18 night. 19 Q. Um-hum. 20 A. Including I delivered a couple of babies, 21 did a few things there for them. Covering -- I 22 covered the whole hospital.</p>

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<p>61</p> <p>1 When did I do this? I did it in the</p> <p>2 early '90s, I'll just leave it at that. I know</p> <p>3 they called me back during the Persian Gulf War,</p> <p>4 they were short of doctors and so I kind of went</p> <p>5 back as a --</p> <p>6 Q. Do you have a résumé?</p> <p>7 A. -- patriotic thing.</p> <p>8 I didn't -- no, I didn't bring a résumé.</p> <p>9 Q. Do you maintain a résumé or keep a</p> <p>10 résumé?</p> <p>11 A. I don't normally.</p> <p>12 Q. Okay. What I'd like to do is go through</p> <p>13 your employment history, and to the best of your</p> <p>14 ability -- I'd kind of leave it open ended to you,</p> <p>15 go chronologically following your internship.</p> <p>16 A. Oh, my goodness.</p> <p>17 Q. And I understand there's been many places</p> <p>18 and you might not have the order or sequence or</p> <p>19 years correct, but I'd just like to get a general</p> <p>20 sense of your employment history before we can</p> <p>21 narrow it down.</p> <p>22 A. I don't know that I can remember all of</p>	<p>63</p> <p>1 emergency room work that I almost qualified to take</p> <p>2 the Boards. If I had just been either a year or</p> <p>3 two older or done a little bit more ER work, I</p> <p>4 would have been grandfathered in to be qualified as</p> <p>5 an emergency room -- take the Boards in emergency</p> <p>6 medicine.</p> <p>7 I remember --</p> <p>8 Q. So let me -- let me stop you just for a</p> <p>9 second. The hospitals that you mentioned earlier</p> <p>10 are the Ellenville Hospital in the Catskills and the</p> <p>11 Port Jervis Hospital, you were doing emergency</p> <p>12 medicine at those two?</p> <p>13 A. Well, those are the ones outside -- yes,</p> <p>14 these were all ER -- ER -- I was working as an ER</p> <p>15 physician.</p> <p>16 Q. Okay.</p> <p>17 A. Those were the ones outside of New York</p> <p>18 City.</p> <p>19 Q. Okay. And the ones in New York City,</p> <p>20 were you also working as an ER physician?</p> <p>21 A. Yes.</p> <p>22 Q. Okay. Where else have you practiced as</p>
<p>62</p> <p>1 this. I'm sorry. I mean --</p> <p>2 MR. GREANEY: Just provide what you can</p> <p>3 recall.</p> <p>4 Q. Um-hum. I mean, we can start with the</p> <p>5 conclusion of your internship. What's the -- I</p> <p>6 think you told me you were working for</p> <p>7 Planned Parenthood at the same time you were</p> <p>8 working on your Ph.D.</p> <p>9 A. Um-hum. I was working for Planned -- so</p> <p>10 at the conclusion of my internship, I -- I --</p> <p>11 (Telephone interruption.)</p> <p>12 A. Excuse me. I'm sorry. I can't answer.</p> <p>13 Q. If you need to get it, let me know.</p> <p>14 A. I can't -- I can't talk right now. I</p> <p>15 just can't do this.</p> <p>16 All right. So go ahead. Where were we?</p> <p>17 At the con -- oh --</p> <p>18 Q. You were working --</p> <p>19 A. What things -- all my employment history.</p> <p>20 Well, I worked a number -- I told you a number of</p> <p>21 the hospitals, I did emerg -- I worked as an</p> <p>22 emergency room physician. I had done enough</p>	<p>64</p> <p>1 an ER physician, besides the ones we've talked</p> <p>2 about, if anywhere?</p> <p>3 A. What other hospitals?</p> <p>4 Q. Yeah.</p> <p>5 A. Oh, I don't know if I can remember them</p> <p>6 all. There was that hospital in Queens called</p> <p>7 Parkway or something -- I forgot the name of that</p> <p>8 one. Then I worked at Lincoln Hospital, South</p> <p>9 Bronx. Harlem Hospital.</p> <p>10 Where else did I work as an ER doc? I</p> <p>11 don't remember all of the hospitals in New York.</p> <p>12 Q. Were you living in New York at the time?</p> <p>13 A. Yes.</p> <p>14 Q. And --</p> <p>15 A. I was living in Manhattan, I --</p> <p>16 Q. And were you working kind of as an</p> <p>17 independent contractor, a locum tenens for these</p> <p>18 hospitals or as an employee of the hospitals</p> <p>19 themselves?</p> <p>20 A. I think it -- it was different.</p> <p>21 Sometimes, I was an employee the hospital.</p> <p>22 Sometimes, I was working for -- there were</p>

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<p style="text-align: right;">65</p> <p>1 companies that were staffing companies that would</p> <p>2 staff the hospital of the emergency rooms.</p> <p>3 Q. Okay.</p> <p>4 A. But I was always working as a --</p> <p>5 basically, as a -- either as a -- solely, as an</p> <p>6 emergency room. In the bigger hospitals, it was</p> <p>7 just the emergency room. In the smaller hospitals</p> <p>8 like Ellenvale or West Point, which is actually a</p> <p>9 smaller hospital, you -- I would be the -- in those</p> <p>10 situations, I would be the only doc -- I would be</p> <p>11 the only doctor in the hospital. So I was covering</p> <p>12 the ICU and covering labor and delivery --</p> <p>13 Q. Um-hum.</p> <p>14 A. -- and covering the ER and everything.</p> <p>15 Q. And at some point, your career, I take</p> <p>16 it, transitioned from emergency medicine to</p> <p>17 gynecology and pregnancy termination services?</p> <p>18 A. Yes.</p> <p>19 Q. Approximately, when was that?</p> <p>20 A. Well, there was a -- from when I</p> <p>21 graduated in medical school in '86 and finished my</p> <p>22 res -- the internship in '87, from '87 until '95, I</p>	<p style="text-align: right;">67</p> <p>1 come back, but I don't remember the -- I don't</p> <p>2 remember exactly what year, but by -- certainly by</p> <p>3 the late '90s, I had stopped the ER stuff.</p> <p>4 Q. Okay. You are the president of American</p> <p>5 Physicians Associates or American Medical</p> <p>6 Associates?</p> <p>7 A. American Physicians Associates?</p> <p>8 Q. The name of your company, is it American</p> <p>9 Medical Associates now?</p> <p>10 A. The American Medical Associates, P.C. --</p> <p>11 Q. Um-hum.</p> <p>12 A. -- is a corporation. It's defunct. But</p> <p>13 I was the president of it.</p> <p>14 Q. Okay. When did you -- did you form</p> <p>15 American Medical Associates, P.C.?</p> <p>16 A. I think a lawyer did.</p> <p>17 Q. Were you the president of American</p> <p>18 Medical Associates, P.C. when it was formed?</p> <p>19 A. Yes.</p> <p>20 Q. Okay. The lawyer did the paperwork for</p> <p>21 you, but it was your idea to start the company,</p> <p>22 true?</p>
<p style="text-align: right;">66</p> <p>1 was sort of doing both.</p> <p>2 Q. Okay.</p> <p>3 A. But I was transitioning -- there came a</p> <p>4 point where I was considering becoming an emergency</p> <p>5 room physician full time professionally. At one</p> <p>6 point, I told you I was -- thought I was</p> <p>7 grandfathered in. Then I was, at one point,</p> <p>8 considering -- then what was happening was they</p> <p>9 were coming out with ER medicine residency training</p> <p>10 programs. And I thought about applying for a</p> <p>11 residency. And I guess I decided not to.</p> <p>12 And then I had -- then -- so --</p> <p>13 Q. So focus on my question, so we don't have</p> <p>14 to bring you back for a second day, because I know</p> <p>15 you have a time constraint. When</p> <p>16 chronologically --</p> <p>17 A. By '95, I was mostly -- I was doing</p> <p>18 pregnancy termination and --</p> <p>19 Q. Okay.</p> <p>20 A. -- gynecology. And I would have</p> <p>21 stopped -- I don't think -- I don't remember</p> <p>22 exactly what year. West Point kept wanting me to</p>	<p style="text-align: right;">68</p> <p>1 A. Yes, I guess.</p> <p>2 Q. When was -- when did American Medical</p> <p>3 Associates, P.C. become defunct, to use your word?</p> <p>4 A. I don't remember exactly.</p> <p>5 Q. Well, was it within the last year, two</p> <p>6 years, five years?</p> <p>7 A. Certainly within the last five years.</p> <p>8 Pretty much -- yeah, it was certainly within the</p> <p>9 last five years.</p> <p>10 Q. Any finer point than that?</p> <p>11 A. It -- I mean, what happened was</p> <p>12 Associates lost its licenses, so it had no more</p> <p>13 revenue, so it just fizzled out basically.</p> <p>14 Q. When you say --</p> <p>15 A. But when did it -- when did it fizzle</p> <p>16 out? I -- I -- I don't know. It was sort of a</p> <p>17 fizzling out. So when did -- when did -- when was</p> <p>18 it dead versus fizzling? I don't know exactly.</p> <p>19 Q. What -- when you say, Associates lost its</p> <p>20 license, what do you mean?</p> <p>21 A. So American Medical Associates was</p> <p>22 providing physicians for -- there was a company,</p>

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<p style="text-align: right;">69</p> <p>1 Associates -- I forget the full name -- and they 2 were licensed in Maryland as abortion clinics, and 3 Maryland revoked their licenses. 4 Q. Okay. Let's back up for a second. 5 When did you form, with the help of a 6 lawyer, American Medical Associates, P.C.? 7 A. I don't remember. 8 Q. Mid '90s? Late '90s? Early 2000s? 9 A. I just don't remember. I'm sorry. 10 Q. Okay. Did anybody else form that company 11 with you? Were there any other owners, I mean? 12 A. No. 13 Q. Were there any other stakeholders, people 14 who had a property -- 15 A. I was -- 16 Q. -- interest in that company? 17 A. No. 18 Q. Okay. So you -- you were the sole and 19 exclusive owner and president of American Medical 20 Associates when it was formed? 21 A. Yes. 22 Q. Was there ever a time during its</p>	<p style="text-align: right;">71</p> <p>1 American Medical Associates, never did business, 2 under the trade name, American Women's Services? 3 A. Not that I remember, no. I think 4 American Women's Services is a trade name. I 5 mean -- well, let me qualify. American Medical 6 Associates, P.C. provided physicians for a company 7 that I think had a trade name of American Women's 8 Services, so does that mean that they were -- I 9 don't know what that means, that's what it did. 10 I know what that means that American 11 Medical Associates was -- what was the question, 12 was it practicing as American Women's Services? 13 Q. Did American -- American Medical 14 Associates, P.C., your company that you were the 15 owner of, ever do business under a trade name, 16 American Women's Services? 17 A. Not that -- no, I don't think so. 18 Q. Did you ever have an ownership interest 19 in any company called American Women's Services? 20 A. No. 21 Q. Have you had an ownership interest in any 22 other company ever, besides American Medical</p>
<p style="text-align: right;">70</p> <p>1 existence -- and by its, I mean, American Medical 2 Associates, P.C. -- that they had had any other 3 owners, besides you, or shareholders or members? 4 A. What -- you mean stockholders? 5 Q. Anyone else who had an ownership interest 6 in the company; stockholders, members, whatever you 7 called them. 8 A. I don't know what you mean by membership 9 state -- there were no other stockholders. 10 Q. Okay. Besides American Medical 11 Associates, P.C. -- which, by the way, did American 12 Medical Associates, P.C. conduct business as 13 American Women's Services at any time? 14 A. No. 15 Q. Did you ever own a company named American 16 Women's Services? 17 A. No. 18 Q. Are you familiar with a company called 19 American Women's Services? 20 A. I'm not familiar with any such company 21 named American Women's Services. 22 Q. And, to your knowledge, your company,</p>	<p style="text-align: right;">72</p> <p>1 Associates? 2 A. Yes. I have had other companies in the 3 past. 4 Q. Okay. Tell me what companies. What are 5 the names of the companies with which you have had 6 an ownership interest? 7 A. I don't remember. 8 Q. Any of them? 9 A. There -- well, there were several, and 10 they're all defunct and out of business, so I 11 mean -- 12 Q. Whether they're defunct or not, I'm 13 interested in knowing what other companies you have 14 ever had an ownership in, besides American Medical 15 Associates, P.C. 16 A. Oh, my goodness. Well, there was one -- 17 I don't remember the name of that company. Let me 18 think, going back, thinking through them all. 19 There was one called Warren Medical Management. 20 Q. Warren, W-a-r-r-e-n? 21 A. Yeah. 22 Q. Okay.</p>

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<p style="text-align: right;">73</p> <p>1 A. There was American Practice -- I forgot 2 the last word of it. There was -- what was the 3 name of that company? E -- E Lab or something. I 4 mean, you're -- 5 Q. Did you say E Lab? 6 A. E -- I am trying to remember. 7 Q. What is E Lab? 8 A. I might have the name wrong. It was -- 9 it was that lawyer, Jerry Chariton, he formed -- 10 no, Nallab. Nallab. Nallab. 11 Q. Okay. 12 A. Nallab. Excuse me. N-a-l-l-a-b. 13 Q. And the lawyer is who, Jerry? 14 A. Jerry Chariton. 15 Q. And who is he? 16 A. He was an attorney. 17 Q. And what was the nature of your business 18 interest with Nallab? 19 A. You mean what did Nallab do? 20 Q. Well, I asked you for the companies in 21 which you had an ownership interest and -- 22 A. Right.</p>	<p style="text-align: right;">75</p> <p>1 A. I don't think Warren Medical Management 2 did. 3 Q. How about American Practice, whatever the 4 third word is, did that company provide pregnancy 5 termination services? 6 A. They did not, I don't think. 7 Q. Did you co-own Warren Medical Management 8 with others, or were you the exclusive owner of 9 that company? 10 A. You know, this is so long ago. This 11 is -- this, you're going back to the early -- the 12 mid '90s. I don't remember. I'm sorry. 13 Q. How about American Practice whatever the 14 third word is, did you own that with anybody else 15 or by yourself? 16 A. I don't remember. 17 Q. Can you think of any other companies that 18 you have had a partial or full ownership interest 19 in ever? 20 A. I'm trying to go back and think back in 21 time. There were other companies. It is not the 22 entire --</p>
<p style="text-align: right;">74</p> <p>1 Q. -- you -- you mentioned Warren Medical 2 Management, American Practice something and Nallab. 3 A. You mean in the past. You're talking 4 about in the past. 5 Q. Ever. Yes. 6 A. Ever. Yeah. Yeah. Yeah. I -- I don't 7 remember all -- 8 Q. Okay. 9 A. I mean, there were a number of 10 corporations or entities. They're all defunct 11 or -- 12 Q. What is your -- what was your ownership 13 interest in Nallab? 14 A. I don't remember. 15 Q. What did Nallab do? 16 A. Honestly, I don't remember. 17 Q. What did Warren Medical Management do? 18 A. I believe they did management. 19 Q. Of what? 20 A. Of medical offices. 21 Q. Did Warren Medical Management provide 22 pregnancy termination services?</p>	<p style="text-align: right;">76</p> <p>1 Q. Can you -- 2 A. -- list. 3 Q. Can you think of any of the names of any 4 of those other companies, sitting here today? 5 A. I don't want to misspeak. I'm under 6 oath. American Medical Services. 7 Q. Okay. What is American Medical Services? 8 A. Well, it doesn't exist anymore, but it 9 was a corporation that provided medical care. 10 Q. Did American Medical Services provide 11 pregnancy termination services? 12 A. Yes. 13 Q. Were you the sole owner of American 14 Medical Services? 15 A. No. 16 Q. Who -- 17 A. Oh, yes. Yes, I was. Yes, I was. 18 Excuse me. 19 Q. When did you form American Medical 20 Services? 21 A. I want to say in the early '90s. 22 Q. When you formed American Medical</p>

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<p style="text-align: right;">77</p> <p>1 Associates, PC, the first company we talked about,</p> <p>2 where was that company formed? In what state?</p> <p>3 A. I believe in Pennsylvania.</p> <p>4 Q. Okay. How about American Medical</p> <p>5 Services, what state was that company incorporated</p> <p>6 in?</p> <p>7 A. New Jersey.</p> <p>8 Q. Okay. Is there a business relationship</p> <p>9 between American Medical Associates and American</p> <p>10 Medical Services?</p> <p>11 A. Now -- no. No.</p> <p>12 Q. Okay.</p> <p>13 A. They're both defunct. There is no</p> <p>14 relationship. They're real -- there is -- there is</p> <p>15 nothing for any of these.</p> <p>16 Q. Was there ever a relationship between</p> <p>17 American Medical Associates and American Medical</p> <p>18 Services?</p> <p>19 A. No.</p> <p>20 Q. Can you think of any other companies that</p> <p>21 you have had a sole or partial ownership interest</p> <p>22 at any time, besides the ones you've mentioned?</p>	<p style="text-align: right;">79</p> <p>1 Q. By you?</p> <p>2 A. By Englewood.</p> <p>3 Q. Okay.</p> <p>4 A. By the attorney for Englewood.</p> <p>5 Q. Okay. Do you know why your name is on</p> <p>6 the petition for bankruptcy filed on behalf of</p> <p>7 Englewood Women's Services in 2016?</p> <p>8 A. Do I know why?</p> <p>9 Q. Yeah.</p> <p>10 A. Yes.</p> <p>11 Q. Why?</p> <p>12 A. Because Dr. Kaji asked me to do it.</p> <p>13 Q. What do you mean?</p> <p>14 A. Englewood Women's Services was the tenant</p> <p>15 to a lease and there was a -- I'm trying to</p> <p>16 remember now. There was a -- they were behind in</p> <p>17 their rent. They're behind in their rent. And</p> <p>18 they were -- they were going to be evicted.</p> <p>19 Q. Um-hum.</p> <p>20 A. And so -- so we didn't want them to be</p> <p>21 evicted.</p> <p>22 Q. Who is we?</p>
<p style="text-align: right;">78</p> <p>1 A. I don't remember them right now --</p> <p>2 Q. How about --</p> <p>3 A. -- as we sit here.</p> <p>4 Q. How about Englewood?</p> <p>5 A. What about -- Englewood -- Englewood</p> <p>6 Women's Services --</p> <p>7 Q. Yeah.</p> <p>8 A. -- LLC. Yes. What about that?</p> <p>9 Q. Is that a company that you have a sole or</p> <p>10 partial ownership interest in?</p> <p>11 A. No.</p> <p>12 Q. Who owns Englewood Women's Services?</p> <p>13 A. I don't know.</p> <p>14 Q. Have you ever had an ownership interest</p> <p>15 in Englewood Women's Services?</p> <p>16 A. No.</p> <p>17 Q. Why did you submit -- well, did you</p> <p>18 submit an application for bankruptcy on behalf of</p> <p>19 that corporation last year?</p> <p>20 A. Did I -- did I -- did I personally? I</p> <p>21 did so -- I -- there was an application for</p> <p>22 bankruptcy submitted.</p>	<p style="text-align: right;">80</p> <p>1 A. Me and Dr. Kaji.</p> <p>2 Q. Okay. What is your relationship with</p> <p>3 Dr. -- you're talking about Vikram Kaji?</p> <p>4 A. Yes, ma'am.</p> <p>5 Q. And what is your relationship with</p> <p>6 Dr. Vikram Kaji?</p> <p>7 A. We are colleagues.</p> <p>8 Q. Professional physician colleagues?</p> <p>9 A. Yeah.</p> <p>10 Q. Okay. Does Dr. Kaji have an ownership</p> <p>11 interest in Englewood Women's Services, to your</p> <p>12 knowledge?</p> <p>13 A. Not to my knowledge, no.</p> <p>14 Q. Okay. So it's your understanding that</p> <p>15 your professional colleague, Dr. Kaji, who had no</p> <p>16 ownership interest in Englewood Women's Services</p> <p>17 whatsoever, asked you to submit a petition for</p> <p>18 bankruptcy on behalf of that corporation because it</p> <p>19 was behind in its rent and was going to be evicted?</p> <p>20 A. Yeah, because Dr. Kaji owned a company</p> <p>21 that was practicing there. It was a subtenant of</p> <p>22 Englewood. So they didn't -- he didn't want -- he</p>

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<p>81</p> <p>1 didn't want the facility to get evicted.</p> <p>2 Q. Why did you submit the petition for</p> <p>3 bankruptcy?</p> <p>4 A. So that they wouldn't get evicted.</p> <p>5 Q. They, being Englewood?</p> <p>6 A. Yeah.</p> <p>7 Q. You have no ownership interest in</p> <p>8 Englewood Women's Services whatsoever?</p> <p>9 A. I have no personal ownership in Englewood</p> <p>10 Women's Services, no.</p> <p>11 Q. Have you ever?</p> <p>12 A. No.</p> <p>13 Q. So you submitted a petition for</p> <p>14 bankruptcy on behalf of a corporation that you have</p> <p>15 no financial or business interest in whatsoever?</p> <p>16 A. Right. I told the trustee that at the</p> <p>17 time.</p> <p>18 Q. Okay. How about RoseHealth Services,</p> <p>19 are you familiar with that corporation?</p> <p>20 A. I am.</p> <p>21 Q. Have you ever had an ownership interest</p> <p>22 in a company called Rose Health Services?</p>	<p>83</p> <p>1 A. I believe that it was a nonprofit</p> <p>2 corporation that was owned by Judith Fitch.</p> <p>3 Q. Okay. How about Englewood Women's</p> <p>4 Services, do you know who owned it?</p> <p>5 A. I don't.</p> <p>6 Q. So in dealing with the bankruptcy</p> <p>7 proceedings, you never came to learn who owned</p> <p>8 Englewood Women's Services?</p> <p>9 A. What do you mean? I never came to</p> <p>10 know -- learn?</p> <p>11 Q. Yeah. Sitting here today, do you have</p> <p>12 any knowledge of who owns Englewood Women's</p> <p>13 Services?</p> <p>14 A. I don't know. I can -- I don't know,</p> <p>15 offhand, who owns Englewood Women's Services.</p> <p>16 Q. How about Allentown Medical Services,</p> <p>17 have you ever had an ownership interest in a</p> <p>18 company with that name?</p> <p>19 A. Not that I remember.</p> <p>20 Q. How about a company called Grace Medical</p> <p>21 Care, have you ever had an ownership interest in a</p> <p>22 company with that name?</p>
<p>82</p> <p>1 A. No.</p> <p>2 Q. At any time?</p> <p>3 A. No.</p> <p>4 Q. What is your understanding as to what</p> <p>5 that company is?</p> <p>6 A. Well, it doesn't exist anymore is my</p> <p>7 understanding.</p> <p>8 Q. Okay. When it existed, what was it?</p> <p>9 A. It was a nonprofit. My understanding is,</p> <p>10 and I -- I'm reciting the -- my understanding is,</p> <p>11 but I'm -- I'm not -- I'm not certain of this and</p> <p>12 I'm not an attorney, is that it was a nonprofit</p> <p>13 corporation.</p> <p>14 Q. That provided pregnancy termination</p> <p>15 services?</p> <p>16 A. I'm not sure if it -- if it was the one</p> <p>17 that was providing pregnancy terminations.</p> <p>18 (Telephone interruption.)</p> <p>19 A. I can't take this right now. Sorry.</p> <p>20 Go ahead.</p> <p>21 Q. Do you know who owned Rose Health</p> <p>22 Services Company when it was in existence?</p>	<p>84</p> <p>1 A. Grace Medical Care, I don't think was a</p> <p>2 company.</p> <p>3 Q. What is -- do you know what Grace Medical</p> <p>4 Care is?</p> <p>5 A. It was -- I don't think it was -- I mean,</p> <p>6 I don't know what to say. I don't think it existed</p> <p>7 as a separate entity.</p> <p>8 Q. Okay. What -- what do you believe Grace</p> <p>9 Medical Care to be?</p> <p>10 A. I don't think it is anything. To be,</p> <p>11 that implies that it's something, but I don't think</p> <p>12 it is anything.</p> <p>13 Q. Have you ever heard of a business</p> <p>14 operation called Grace Medical Care?</p> <p>15 A. I have heard that name, Grace Medical</p> <p>16 Care, yes.</p> <p>17 Q. Have you ever been affiliated with an</p> <p>18 institution that called itself Grace Medical Care?</p> <p>19 A. I have -- institution called itself Grace</p> <p>20 Medical Care? I'm not sure that -- I'm not -- I</p> <p>21 want to -- I'm sure how to answer that question.</p> <p>22 Q. Have you ever provided pregnancy</p>

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<p style="text-align: right;">85</p> <p>1 termination services or gynecological health 2 services under a business operating as the name 3 Grace Health Service -- I'm sorry, Grace Medical 4 Care? 5 A. Would you repeat that question, please? 6 Q. You -- when I asked you about a company 7 or business named, Grace -- 8 A. Yes. 9 Q. -- Medical Care -- 10 A. Right. 11 Q. -- you indicated that that was a name 12 that was familiar to you. 13 A. I know that name, Grace Medical Care, 14 yes. 15 Q. How do you know that name? 16 A. I provided -- I provided, as a physician, 17 pregnancy termination procedures for an 18 organization that -- I -- I'm not sure what the 19 connection was to that name. That used that name, 20 or I don't know what exactly the story -- the 21 situation. 22 Q. Were you ever employed by an entity named</p>	<p style="text-align: right;">87</p> <p>1 A. No. 2 Q. Have you ever served as a resident agent 3 for Associates in OB/GYN Care? 4 A. I don't remember that. 5 Q. Okay. Do you know who owns Associates in 6 OB/GYN Care? 7 A. No. 8 Q. You have no idea? 9 A. I think there's -- I had heard that 10 there's a nonprofit that owns it. 11 Q. What is the nonprofit that you believe 12 owns it? 13 A. I don't remember the name off the top of 14 my head because it's defunct -- I mean, all this 15 stuff is defunct. Like you're asking, again, 16 you're going back years ago. 17 Q. Where did you hear that Associates in 18 OB/GYN was owned by a nonprofit? 19 A. In Maryland. 20 Q. Okay. How did you hear it? 21 A. How did I hear it? 22 Q. How did you hear that information? Who</p>
<p style="text-align: right;">86</p> <p>1 Grace Medical Care? 2 A. No. 3 Q. Okay. How about Integrity Family Health, 4 have you ever had an ownership interest in a 5 company with that name? 6 A. No. 7 Q. Are you familiar with a company or 8 business or operation called Integrity Family 9 Health? 10 A. Not off the top of my head. 11 Q. Okay. How about Associates in OB/GYN 12 Care, LLC, are you familiar with that entity? 13 A. I am because I think it's -- is it part 14 of this case? It's -- I'm -- I'm -- I -- I have 15 heard of that entity, yes. 16 Q. How have you heard of that entity? 17 A. My understanding is that's the entity 18 that had facilities in Maryland, including the one 19 that I think -- I'm not sure, but I think this was 20 the one that Ms. O'Connell went to. 21 Q. Have you ever had an ownership interest 22 in Associates in OB/GYN Care?</p>	<p style="text-align: right;">88</p> <p>1 told you? 2 A. That's what I was told. Who told me? 3 Q. Yeah. 4 A. Dr. Walker. 5 Q. Who is Dr. Walker? 6 A. A doctor. 7 Q. Where? 8 A. In Maryland. 9 Q. What is Dr. Walker's first name? 10 A. I don't remember. 11 Q. Male or female? 12 A. Female. 13 Q. What kind of doctor is Dr. Walker? 14 A. What kind? 15 Q. Yeah. What's her specialty? 16 A. I think OB/GYN. 17 Q. Okay. And when did you first meet 18 Dr. Walker? 19 A. What year? 20 Q. Approximately. 21 A. I'm not sure. Maybe 2009, 2010. 22 Q. Okay. How did you meet Dr. Walker?</p>

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<p style="text-align: right;">89</p> <p>1 A. How?</p> <p>2 Q. Um-hum.</p> <p>3 A. I don't remember.</p> <p>4 Q. Did you meet Dr. Walker in Maryland?</p> <p>5 A. Yes.</p> <p>6 Q. What brought you to Maryland in 2009,</p> <p>7 2010 that occasioned your meeting Dr. Walker?</p> <p>8 A. I was practicing medicine.</p> <p>9 Q. In Maryland?</p> <p>10 A. Yes.</p> <p>11 Q. What were you doing in Maryland,</p> <p>12 practicing medicine in the 2009/2010 time frame?</p> <p>13 A. I was -- this was that whole thing where</p> <p>14 I lost my license in New Jersey, this was the whole</p> <p>15 question, because I was practicing medicine, in</p> <p>16 conjunction with another Maryland physician, Dr. --</p> <p>17 what was his name -- Shepard.</p> <p>18 Q. What is Dr. Shepard's first name?</p> <p>19 A. George.</p> <p>20 Q. How do you spell Shepard?</p> <p>21 A. S-h-e-p-a-r-d.</p> <p>22 Q. Okay. Dr. George Shepard, is he an</p>	<p style="text-align: right;">91</p> <p>1 Dr. Walker?</p> <p>2 A. Yes.</p> <p>3 Q. How?</p> <p>4 A. What do you mean how?</p> <p>5 Q. In what way?</p> <p>6 A. We were working, seeing patients.</p> <p>7 Q. Where were you seeing patients?</p> <p>8 A. When?</p> <p>9 Q. Where were you seeing patients in</p> <p>10 Maryland during the time that you met Dr. Walker</p> <p>11 and Dr. Shepard?</p> <p>12 A. I -- let's see. I was seeing patients in</p> <p>13 Elkton, Maryland.</p> <p>14 Q. Um-hum.</p> <p>15 A. And I don't -- that was the only place</p> <p>16 that I was seeing patients. But I encountered</p> <p>17 Dr. Walker because -- through American Medical</p> <p>18 Associates too.</p> <p>19 Q. When you were seeing patients in Elkton,</p> <p>20 what years was that?</p> <p>21 A. 2009, 2010.</p> <p>22 Q. And you didn't have a license to practice</p>
<p style="text-align: right;">90</p> <p>1 OB/GYN?</p> <p>2 A. Um-hum.</p> <p>3 Q. And how did you meet Dr. Shepard?</p> <p>4 A. I met him through Dr. Kaji.</p> <p>5 Q. Okay. So if I'm following you, Dr. Kaji</p> <p>6 introduced you to Dr. Shepard, who was practicing</p> <p>7 obstetrics and gynecology in Maryland, right?</p> <p>8 A. Yes.</p> <p>9 Q. And Dr. Shepard introduced you to</p> <p>10 Dr. Walker?</p> <p>11 A. I think that's right.</p> <p>12 Q. Okay. You believe at the time -- well,</p> <p>13 strike that. I'm sorry.</p> <p>14 Refresh my recollection, what is</p> <p>15 Dr. Walker's affiliation with Associates of OB/GYN</p> <p>16 Care -- or if -- if there is one?</p> <p>17 I think you told me Dr. Walker told you</p> <p>18 that Associates in OB/GYN Care was owned by a</p> <p>19 nonprofit, if I got that right.</p> <p>20 A. Right.</p> <p>21 Q. Okay. What were you -- were you working</p> <p>22 professionally with either Dr. Shepard or</p>	<p style="text-align: right;">92</p> <p>1 medicine in Maryland at that time, true?</p> <p>2 A. True.</p> <p>3 Q. Okay. How was it that you were seeing</p> <p>4 patients in Elkton, Maryland, when you didn't have</p> <p>5 a license to practice medicine in Maryland?</p> <p>6 A. I had a license to practice medicine in</p> <p>7 New Jersey, and Maryland had a statute that you</p> <p>8 could prac -- you could legally and lawfully</p> <p>9 practice medicine in Maryland -- State of Maryland</p> <p>10 without a license, provided you were engaging in</p> <p>11 consultation with a Maryland licensed physician.</p> <p>12 Q. Okay. So the Maryland physician that you</p> <p>13 were providing consultation with was whom?</p> <p>14 A. Dr. Shepard.</p> <p>15 Q. Okay. And where were you providing those</p> <p>16 consultations with Dr. Shepard in Maryland?</p> <p>17 A. In Elkton.</p> <p>18 Q. What was the name of the facility at</p> <p>19 which you provided those consultations with</p> <p>20 Dr. Shepard?</p> <p>21 A. The facility?</p> <p>22 Q. Yeah.</p>

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<p style="text-align: right;">93</p> <p>1 A. I don't think the facility had a name.</p> <p>2 Q. Did it operate under any --</p> <p>3 A. There was no name on the door.</p> <p>4 Q. Well, if a woman wanted to get services</p> <p>5 at that facility, what would she know it as? What</p> <p>6 would it be called in the community?</p> <p>7 A. I don't think it was called anything in</p> <p>8 the community.</p> <p>9 Q. How would women find it?</p> <p>10 A. I think that they were -- I think that we</p> <p>11 were trying to keep a low profile because we were</p> <p>12 providing pregnancy terminations, so we were not</p> <p>13 trying to be found.</p> <p>14 Q. Okay. The facility in Elkton, this is</p> <p>15 the facility where you indicated earlier, the</p> <p>16 initiation of the termination would start in</p> <p>17 New Jersey and then the woman would come to the</p> <p>18 facility in Elkton later for the completion of the</p> <p>19 termination, right?</p> <p>20 A. I don't agree with that characterization.</p> <p>21 Q. Okay. Tell me -- tell me a better way to</p> <p>22 characterize it then.</p>	<p style="text-align: right;">95</p> <p>1 A. That facility, as I said before, there</p> <p>2 was no name on the door. If you asked me what name</p> <p>3 Dr. Shepard operated under, I think it was</p> <p>4 George Shepard --</p> <p>5 Q. Okay.</p> <p>6 A. -- M.D.</p> <p>7 Q. And how did it come to be that</p> <p>8 Dr. Shepard introduced you to Dr. Walker?</p> <p>9 A. How did Dr. Shepard meet Dr. Walker?</p> <p>10 Q. No, did you ever meet -- well, let me</p> <p>11 back up for a second.</p> <p>12 Did you ever meet Dr. Walker?</p> <p>13 A. Yes.</p> <p>14 Q. When? Same time frame; 2009 to 2010,</p> <p>15 when you were coming to Maryland?</p> <p>16 A. I don't remember when I first encountered</p> <p>17 Dr. Walker.</p> <p>18 Q. What is the nature of your relationship</p> <p>19 with Dr. Walker?</p> <p>20 A. Doc -- well, I was the president of</p> <p>21 American Medical Associates --</p> <p>22 Q. Um-hum.</p>
<p style="text-align: right;">94</p> <p>1 A. The procedures were done in Elkton.</p> <p>2 Q. Okay. And was the facility in Elkton</p> <p>3 solely for the purpose of terminating pregnancies?</p> <p>4 I'll stop there.</p> <p>5 A. No.</p> <p>6 Q. What else was -- what other services were</p> <p>7 rendered at that facility in Elkton?</p> <p>8 A. Contraception.</p> <p>9 Q. Okay. And Dr. Shepard, was he affiliated</p> <p>10 with any type of business or corporation, to your</p> <p>11 knowledge?</p> <p>12 A. Yes.</p> <p>13 Q. What was the name of that entity?</p> <p>14 A. He was chairman of obstetrics and</p> <p>15 gynecology at Mercer Hospital, so Mercer Hospital.</p> <p>16 Q. His facility in Elkton, the one where you</p> <p>17 provided consultations, pursuant to the Maryland</p> <p>18 law that allowed you to consult with a Maryland</p> <p>19 doctor --</p> <p>20 A. Yes.</p> <p>21 Q. -- okay, what business name or trade name</p> <p>22 was that clinic operating under?</p>	<p style="text-align: right;">96</p> <p>1 A. -- P.C. American Medical Associates,</p> <p>2 P.C. was providing physicians to Associates in</p> <p>3 OB/GYN Care, LLC, and Dr. Walker seemed to be --</p> <p>4 I'm not sure what her relationship was with</p> <p>5 Associates in OB/GYN Care, LLC. She seemed to be</p> <p>6 running it.</p> <p>7 Q. Okay.</p> <p>8 A. I don't -- but I can't speak to -- I -- I</p> <p>9 don't know for a fact what exactly her relationship</p> <p>10 is with Associates.</p> <p>11 Q. Did the clinic in Elkton, where you saw</p> <p>12 patients, was it your understanding that that</p> <p>13 clinic was affiliated with Associates in OB/GYN</p> <p>14 Care?</p> <p>15 A. I don't know.</p> <p>16 Q. Now, you said that your company, American</p> <p>17 Medical Associates, provided physicians to</p> <p>18 Associates in OB/GYN Care?</p> <p>19 A. Yes.</p> <p>20 Q. When did that relationship begin?</p> <p>21 A. I don't remember.</p> <p>22 Q. Can you give me an approximate time?</p>

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<p>1 Late '90s? 2000s?</p> <p>2 A. It was not the late '90s, I don't think.</p> <p>3 I -- it was in the 2000s sometime.</p> <p>4 Q. Did you have a contract -- did your</p> <p>5 company, American Medical Associates, have a</p> <p>6 contract with Associates in OB/GYN Care?</p> <p>7 A. Yes.</p> <p>8 Q. Okay. Do you have a copy of that</p> <p>9 contract?</p> <p>10 A. I don't, no.</p> <p>11 Q. You don't know or you -- or no?</p> <p>12 A. I don't.</p> <p>13 Q. Okay.</p> <p>14 A. We had a contract at one point.</p> <p>15 Q. Okay. Where --</p> <p>16 A. But we --</p> <p>17 Q. Go ahead. Sorry.</p> <p>18 A. We were evicted from our office space and</p> <p>19 during that eviction process, we lost a lot of</p> <p>20 papers, so I don't know -- I don't know where it is</p> <p>21 exactly.</p> <p>22 Q. When you say, we were evicted, is we,</p>	<p>1 Q. Besides 1 Alpha Avenue?</p> <p>2 A. Well, let me go back. The reason I said,</p> <p>3 I guess you could say that was because American</p> <p>4 Medical Associates was providing physicians in</p> <p>5 Maryland. So it wasn't providing physicians at</p> <p>6 1 Alpha Avenue, but I think you asked, if it was</p> <p>7 the -- what was the -- how did you phrase it? The</p> <p>8 business office? What did you -- I forgot the</p> <p>9 language you used, I said -- that's why I said, I</p> <p>10 guess you could say that.</p> <p>11 Q. What -- when you formed it, what was the</p> <p>12 princi -- when you formed it, at the time you did,</p> <p>13 what was the principal business address for</p> <p>14 American Medical Associates?</p> <p>15 A. The business address?</p> <p>16 Q. The principal place of business for that</p> <p>17 company.</p> <p>18 A. Well, the business address and the</p> <p>19 principal place of business are two different</p> <p>20 things.</p> <p>21 Q. Then tell me -- tell me what was which.</p> <p>22 A. Okay. I think -- and I'm not certain of</p>
<p>1 American Medical Associates?</p> <p>2 A. Yes, American Medical Associates was</p> <p>3 evicted.</p> <p>4 Q. Evicted from where?</p> <p>5 A. Well, it was one of -- I mean, the -- the</p> <p>6 administrative office that we did -- that did --</p> <p>7 evicted from 1 Alpha Avenue, Voorhees, New Jersey.</p> <p>8 Q. Okay. Was 1 Alpha Avenue, Voorhees,</p> <p>9 New Jersey, the main business address for American</p> <p>10 Medical Associates?</p> <p>11 A. I guess you could say that. I'm not</p> <p>12 sure -- the main business address? I suppose.</p> <p>13 Yeah, I guess you could say that.</p> <p>14 Q. Well, you've indicated that most of the</p> <p>15 paperwork was kept there.</p> <p>16 A. Yes, that's right.</p> <p>17 Q. Well, did you keep administrative</p> <p>18 paperwork at any other business address, besides 1</p> <p>19 Alpha --</p> <p>20 A. That's why I said --</p> <p>21 Q. Hold on.</p> <p>22 A. Um-hum.</p>	<p>1 this, and I have to be careful because I'm under</p> <p>2 oath and I'm being videotaped and everything, I'm</p> <p>3 not -- I'm trying to be as cooperative and -- we're</p> <p>4 going back like years ago. But as I remember, and</p> <p>5 I think that when we formed it -- you know, I don't</p> <p>6 remember what -- I don't remember what address was</p> <p>7 on the papers, so I can't remember that.</p> <p>8 Q. All right. So tell me what the principal</p> <p>9 place of business was for American Medical</p> <p>10 Associates.</p> <p>11 A. Well, when you say, principal place of</p> <p>12 business, I mean, they provided physicians at</p> <p>13 facilities in Maryland. So in a sense, you might</p> <p>14 say those facilities in Maryland are their, quote,</p> <p>15 principal place of business. But as far as</p> <p>16 administrative paperwork and that sort of stuff, it</p> <p>17 would have been the 1 Alpha Avenue.</p> <p>18 Q. All right.</p> <p>19 A. That's why I'm trying to -- I'm</p> <p>20 struggling with answering your questions. It's not</p> <p>21 straightforward.</p> <p>22 Q. So when American Medical Associates,</p>

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<p style="text-align: right;">101</p> <p>1 through you, its president and sole owner, entered 2 into a contract with Associates in OB/GYN Care to 3 provide physicians to its Maryland abortion 4 clinics, who did you enter into that contract with? 5 A. Who did American Medical Associates enter 6 the contract with? 7 Q. Yes. 8 A. Associates in OB/GYN Care. 9 Q. What individual person did you enter into 10 that contract with? I understand it was a contract 11 between two corporations. 12 A. Right. 13 Q. But you were the sole owner of American 14 Medical Associates, and I presume you had to enter 15 into negotiations and discussions with another 16 human being on behalf of Associates in OB/GYN Care. 17 I want to know who's that human being or beings. 18 A. To the best of my memory, it was 19 Dr. Walker. 20 Q. Okay. You do not remember her first 21 name? 22 A. I don't remember her first name.</p>	<p style="text-align: right;">103</p> <p>1 A. -- fizzled out and went defunct. 2 Q. When did it fizzle out and go defunct? 3 A. When -- the basic story, as I understand 4 it, is Associates in OB/GYN Care was licensed by 5 the State of Maryland as a licensed abortion 6 clinic, and then that license was -- I don't 7 remember what exactly, but it was suspended 8 first -- ultimately, it was revoked. And when they 9 lost their license, then they had no revenue. And 10 so Assoc -- AMA had no revenue, so the whole thing 11 just fizzled out. 12 Q. When did it fizzle out? 13 A. When they lost their license. I think 14 you could look up -- I don't know what year they 15 lost their licenses. I think it's public record. 16 Q. Approximately when? 17 A. I don't know exactly what year. 18 Q. Within the last two years? Five years? 19 A. What is this -- 2007? It was definitely 20 after 2010. And it wasn't within the last two 21 years. It's been several years. I don't remember. 22 Q. Well, Ms. O'Connell was a patient in</p>
<p style="text-align: right;">102</p> <p>1 Q. What time period are we talking about 2 that this association began between your company 3 and Associates in OB/GYN Care? 4 A. In the 2000s. I don't remember exactly 5 which -- 6 Q. Okay. 7 A. -- year. 8 Q. Did there ever come a point in time in 9 your relationship -- in American Medical 10 Associates' relationship with Associates in OB/GYN 11 Care when Dr. Walker was not your primary contact 12 or person that you dealt with on behalf of 13 Associates in OB/GYN Care? 14 A. I don't -- it all fizzled out, so I don't 15 know -- 16 Q. When did -- 17 A. -- I mean -- 18 Q. Go ahead, I'm sorry. I didn't mean to 19 interrupt you. 20 A. So I don't know how to answer that 21 because of the whole thing just kind of -- 22 Q. When --</p>	<p style="text-align: right;">104</p> <p>1 Associates in OB/GYN Care -- 2 A. 2012, right? 3 Q. So it was at least 2012. 4 A. That's right. 5 Q. Okay. 6 A. That's right. 7 Q. Do you know, since from 2012 to now, 8 2017, when -- 9 A. Which exact -- 10 Q. Let me finish my question, sir. When 11 your company, American Medical Associates, stopped 12 doing business with Associates in OB/GYN Care? 13 A. I don't -- I don't remember. 14 Q. During the time that your business, 15 Associates -- American Medical Associates, did 16 business with Associates in OB/GYN Care, was there 17 ever a time that you dealt with anyone else, other 18 than Dr. Walker on behalf of Associates in OB/GYN 19 Care? 20 A. I'm sorry, would you say that question 21 again? During the time what? 22 Q. Your company, American Medical</p>

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<p>105</p> <p>1 Associates, had at least a 12-year relationship 2 providing physician services to an entity in 3 Maryland called Associates in OB/GYN Care -- 4 A. I didn't -- 5 Q. -- true? 6 A. -- say it was a 12-year relationship. I 7 don't know how many years it was. 8 Q. Well, if American Medical Associates was 9 formed in 2000, and we know that Ms. O'Connell 10 received care in 2012, we know it was at least a 11 12-year relationship, true? 12 A. No. 13 Q. Okay. 14 A. I don't know that. I don't know that. 15 Q. Okay. 16 A. You're going -- you're going back way 17 far. These years all blur and -- 18 Q. Okay. 19 A. -- I'm not sure that I can say that, but 20 anyway. 21 Q. Do you know when your business, American 22 Medical Associates, first started doing business</p>	<p>107</p> <p>1 too. 2 Q. Okay. Tell me about the nature of the 3 contract that American Medical Associates had with 4 Associates in OB/GYN Care. 5 A. American Medical Associates, P.C. agreed 6 to provide physicians to Associates, and those 7 physicians would provide medical care for 8 Associates. 9 Q. How many physicians did American Medical 10 Associates agree to provide? 11 A. How many did they provide, or how many 12 did they agree to provide? 13 Q. What was -- what was the nature of the 14 contract that your company entered into with 15 Associates in OB/GYN? 16 A. Well, I just -- 17 Q. Was there -- 18 A. -- answered that. We -- 19 Q. You agreed to provide physician services? 20 A. Right. 21 Q. What are the details? Did you agree on a 22 number of physicians, a time period?</p>
<p>106</p> <p>1 providing physician services in Maryland to an 2 entity called Associates in OB/GYN Care? 3 A. No. 4 Q. Okay. For the years that it did that, 5 for however long it was, did you ever deal with 6 another human being, besides Dr. Walker, on behalf 7 of Associates in OB/GYN Care? 8 A. Did I deal with another individual? What 9 capacity? 10 Q. Did you speak to them? Talk to them on 11 the phone? Write to them? Correspond? Talk to 12 any other human being in terms of your 13 relationship? 14 A. I don't remember. She was the main 15 contact. There were other people at Associates. 16 There were Dr. Panna (Phonetic) dealt with them a 17 lot too. 18 Q. Um-hum. 19 A. And I would talk to Dr. -- so, often, I 20 would talk through intermediaries in a way because, 21 for example, Dr. Panna, I would speak to him and he 22 would talk to them. He would talk to Dr. Walker</p>	<p>108</p> <p>1 A. I think it was an as-needed. I don't 2 think -- I don't think we specified a certain 3 number and all this stuff. 4 Can we take a break? I just want to 5 use -- 6 MS. MALARKEY: Yeah. 7 THE WITNESS: -- the restroom for a 8 second. 9 THE VIDEOGRAPHER: We're going off the 10 record, the time is 11:24 a.m. 11 (Recess taken.) 12 THE VIDEOGRAPHER: We're back on the 13 record, the time is 11:28 a.m. 14 BY MS. MALARKEY: 15 Q. Okay. How is American Medical Associates 16 compensated for providing physician services to 17 Associates in OB/GYN Care? 18 A. Well, they're not anymore. 19 Q. At the time that that business 20 relationship existed, how was American Medical 21 Associates compensated? 22 A. I'm not sure I understand the question.</p>

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<p style="text-align: right;">109</p> <p>1 What do you mean, how was it compensated?</p> <p>2 Q. How does American Medical Associates make</p> <p>3 money, sir?</p> <p>4 A. From Associates in OB/GYN Care.</p> <p>5 Q. Right. Under what terms?</p> <p>6 A. Under the terms of the contract.</p> <p>7 Q. What were the terms of the contract, sir?</p> <p>8 A. Ah. I don't remember the exact -- the</p> <p>9 exact terms, you know, like the amounts of money,</p> <p>10 you're asking? What -- what are you --</p> <p>11 Q. Yes.</p> <p>12 A. I don't remember that exactly.</p> <p>13 Q. Okay. What were the terms? Was it a</p> <p>14 flat rate, we will pay you X-dollars to supply as</p> <p>15 many physicians as we need? Something else?</p> <p>16 A. I -- I don't remember exactly the terms.</p> <p>17 This is -- you're going back a few years.</p> <p>18 MR. GREANEY: Was it on a physician by</p> <p>19 physician basis, meaning each physician you staffed</p> <p>20 to an Associate facility, you would be paid by</p> <p>21 Associates?</p> <p>22 THE WITNESS: Yes, something like that.</p>	<p style="text-align: right;">111</p> <p>1 Medical Associates provided physician services to</p> <p>2 other medical clinics operating in different</p> <p>3 states, besides Maryland?</p> <p>4 A. No.</p> <p>5 Q. Okay. So Maryland is the only state for</p> <p>6 which, or the clinics in Maryland that operated</p> <p>7 under the name, Associates in OB/GYN Care, are the</p> <p>8 only clinics that American Medical Associates</p> <p>9 provided physician services for?</p> <p>10 A. The -- I think that's right, what you</p> <p>11 just said.</p> <p>12 Q. Okay. Did American Medical Associates</p> <p>13 ever enter into any agreements to provide physician</p> <p>14 services to abortion clinics in Virginia?</p> <p>15 A. Not that I remember.</p> <p>16 Q. Did American Medical Associates ever</p> <p>17 enter into any agreements to provide physician</p> <p>18 services to any abortion clinics in New Jersey?</p> <p>19 A. No.</p> <p>20 Q. Okay. Does American Medical Associates</p> <p>21 have any type of relationship, business</p> <p>22 relationship with any abortion clinics in Virginia?</p>
<p style="text-align: right;">110</p> <p>1 Q. What do you mean, something like that?</p> <p>2 Tell me how it worked. This is a company, sir,</p> <p>3 that you owned and have --</p> <p>4 A. Um-hum.</p> <p>5 Q. -- owned for a long time.</p> <p>6 A. Um-hum.</p> <p>7 Q. You've provided physician services to a</p> <p>8 number of different clinics in various states, not</p> <p>9 just Maryland, right?</p> <p>10 A. I'm sorry, what was that last question?</p> <p>11 Q. Okay. Your company, American Medical</p> <p>12 Associates --</p> <p>13 A. Yes.</p> <p>14 Q. -- as I understand it, had an agreement</p> <p>15 to provide physicians to clinics in Maryland that</p> <p>16 operated under the name, Associates in OB/GYN Care,</p> <p>17 true?</p> <p>18 A. Yes, I think that's right.</p> <p>19 Q. Okay. And you -- you negotiated that</p> <p>20 deal with Dr. Walker, whenever it was?</p> <p>21 A. Right.</p> <p>22 Q. Okay. Am I also correct that American</p>	<p style="text-align: right;">112</p> <p>1 A. No.</p> <p>2 Q. How about New Jersey?</p> <p>3 A. I thought I just said -- is that the same</p> <p>4 question you just asked me?</p> <p>5 Q. First, I asked you Virginia. Now, I'm</p> <p>6 asking New Jersey.</p> <p>7 A. I'm --</p> <p>8 MR. GREANEY: First, she asked as to</p> <p>9 staffing. Now she's asking any business</p> <p>10 relationships.</p> <p>11 A. Anyway -- anyway, by the way, I was --</p> <p>12 I'm not supposed to testify about stuff outside of</p> <p>13 Maryland, but not that I know of.</p> <p>14 MR. GREANEY: It's the same answer you</p> <p>15 think it is.</p> <p>16 A. I don't think -- I mean, I think that</p> <p>17 it -- I think the answer's no.</p> <p>18 Q. Okay. How is American Medical Associates</p> <p>19 compensated for providing physician services to</p> <p>20 Associates in OB/GYN Care in Maryland?</p> <p>21 A. How were they compensated?</p> <p>22 Q. Yeah.</p>

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<p style="text-align: right;">113</p> <p>1 A. They were compensated by Associates in 2 OB/GYN Care. 3 Q. Right. And -- and what amount of money 4 did Associates in OB/GYN Care pay to American 5 Medical Associates for that-- 6 A. I don't remember the amounts right -- I 7 mean, you're going back years ago. I couldn't tell 8 you the -- I don't have any records to look at, to 9 look at the payments. 10 Q. Can you give me a range or an estimate? 11 A. I -- I don't want to guess. 12 Q. Are there tax returns that would show 13 that information? 14 A. No. 15 Q. Did American Medical Associates file tax 16 returns? 17 A. American Medical Associates is behind on 18 its tax returns. 19 Q. How behind? 20 A. I don't remember. 21 Q. How many years? 22 A. I don't remember.</p>	<p style="text-align: right;">115</p> <p>1 Q. Why is American Medical Associates behind 2 on its tax returns? 3 A. Because its defunct. It has no money and 4 it has no ability to hire -- it has no money to pay 5 accountants to do the books and prepare tax 6 returns. 7 Q. When did American Medical Associates 8 become defunct, to use your word? 9 A. After Associates lost its license. 10 Q. When you say, Associates, you mean 11 Associates in OB/GYN Care? 12 A. Yeah. That was its main source of 13 income -- sole source of income, as far as I can 14 recall. 15 Q. To your knowledge-- 16 A. So there was no more -- they had no more 17 license, so they had no more income, so the whole 18 thing kind of just fizzled out, like I said. 19 Q. Does American -- did American Medical 20 Associates ever have any other source of income, 21 besides its contract with Associates in OB/GYN 22 Care?</p>
<p style="text-align: right;">114</p> <p>1 Q. Okay. We talking more than five? 2 A. I'm not sure. I know we're getting 3 notices that we have to file returns, but we don't 4 have any money to file -- to hire accountants to 5 file returns, so that's a problem. 6 Q. When is the last time American Medical 7 Associates hired an accountant to complete a tax 8 return? 9 A. I don't remember that offhand. 10 Q. Do you know when the last tax year was 11 that American Medical Associates filed a tax 12 return? 13 A. No. 14 Q. When American Medical -- did American 15 Medical Associates ever have an accountant who 16 filed a tax return? 17 A. I think -- I don't -- I think so. 18 Q. Who? 19 A. There was Kay -- no, what was that -- 20 what was that accountant's name? There was -- 21 there was an accountant, but I don't remember her 22 name.</p>	<p style="text-align: right;">116</p> <p>1 A. Not that I remember. 2 Q. Okay. So before Associates in OB/GYN 3 Care entered into this contract with American 4 Medical Associates, how did American Medical 5 Associates earn money? 6 A. I don't remember. I don't think it did. 7 Q. You don't think American Medical 8 Associates earned money from the time that it was 9 formed in 2000 until the time that it entered into 10 a contract -- 11 A. You know, I don't remember. 12 Q. -- with -- wait. Wait. 13 A. Okay. 14 Q. With American -- I'm sorry, Associates in 15 OB/GYN Care in Maryland? 16 A. Are you telling me American Medical 17 Associates was formed in the year 2000? 18 Q. I believe so. I could be wrong on that, 19 but I believe -- 20 A. Okay. I -- I -- so I, as we sit here, so 21 I want to be careful, because, again, I'm under 22 oath. I don't remember -- be -- before -- before</p>

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<p style="text-align: right;">117</p> <p>1 Associates -- I'm not sure. You know, now you're 2 going back ten years, I mean, you know, a long 3 time, I don't remember what happened, to be honest. 4 It looks like you have the documents, you can tell 5 me. 6 Q. These documents maybe aren't correct, but 7 I have Pennsylvania State Articles of Incorporation 8 for American Medical Services, P.C. in Allentown, 9 Pennsylvania, which was changed a couple months 10 later, the name to American Medical Associates, 11 P.C. That's your company, right? 12 A. I think so -- 13 Q. Okay. 14 A. -- the way you described it. I'm not 15 sure, but -- 16 Q. All right. 17 A. I'm not sure what you're looking at, so I 18 want to be careful -- I didn't see those. 19 Q. I'll show you, sir. I just handed you -- 20 and we can mark this as an exhibit. We'll mark 21 that as Exhibit 1A and this is Exhibit 1B, Articles 22 of Incorporation and an amendment changing the</p>	<p style="text-align: right;">119</p> <p>1 American Medical Associates ever have any source of 2 income, when it was a functional corporation from 3 2000 until whenever it became defunct, besides its 4 contract with Associates in OB/GYN Care? 5 A. I don't remember what it did in the 6 early -- I'm not sure if it did anything. I don't 7 know if it had any other sources of income. I just 8 simply don't remember. I know that its last thing 9 that it did was provide the physicians to 10 Associates and that that -- it wasn't doing 11 anything else, and that that relationship fizzled 12 out and it went defunct, and that was the end of 13 it. 14 Q. So, sitting here today in 2017, besides 15 its contract with Associates in OB/GYN Care, can 16 you think of any other ways, in the last 17 years, 17 that your company, American Medical Associates, has 18 earned money? 19 A. I don't have a specific memory. I'm 20 wondering, as I'm sitting here, since it was 21 form -- I'm trying -- since you showed me the 22 documents, so it helped to refresh my memory that</p>
<p style="text-align: right;">118</p> <p>1 name. 2 (Brigham Exhibits 1A and 1B were marked 3 for identification and are attached to the 4 transcript.) 5 A. Okay. 6 Q. I mean, the documents say what they say, 7 but do you have any reason to dispute that you 8 formed your company, American Medical Services, and 9 then changed its name to American Medical 10 Associates in the year 2000? 11 A. No. I don't have any -- and these 12 documents are a little bit helping to reflect -- or 13 refresh my memory. 14 Q. All right. So starting in 2000, when 15 your company, American Medical Associates, was 16 formed, how did it earn money? 17 A. I do not remember offhand what it was 18 doing in those -- the early years. It was formed 19 as a Pennsylvania company. I don't -- I don't 20 remember what it was doing, if anything. I don't 21 know if it was doing anything in the early years. 22 Q. To your knowledge and recollection, did</p>	<p style="text-align: right;">120</p> <p>1 it was pro -- since it was formed in Pennsylvania, 2 I don't remember if it ever did business in 3 Pennsylvania. I just -- I'm sorry, I don't -- I 4 don't -- I don't want to guess, so I don't know. 5 Q. Okay. Let me ask the question again. My 6 question is, from 2000, when it was formed -- 7 A. Um-hum. 8 Q. -- until today, 2017 -- 9 A. Um-hum. 10 Q. -- can you think of any way that American 11 Medical Associates earned income, besides its 12 contract with Associates in OB/GYN Care in 13 Maryland? 14 A. Can I imagine a way, or do you want me 15 to -- 16 Q. No, sir. 17 A. I don't have a specific memory, so I 18 don't recall any specific thing. 19 Q. You've owned a company for 17 years and 20 you don't know any of the ways in which it earned 21 income? 22 A. I know how it earned income in the last</p>

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<p style="text-align: right;">121</p> <p>1 few years before it went defunct. In the early</p> <p>2 years, I don't remember if it did anything at all.</p> <p>3 Q. Okay. How did you earn income before</p> <p>4 your company entered into a contract with</p> <p>5 Associates in OB/GYN Care in Maryland?</p> <p>6 A. Well, that's a long time frame, before it</p> <p>7 entered -- I mean, from the day I was born until</p> <p>8 the time -- I mean, I did a lot of different</p> <p>9 things.</p> <p>10 Q. I think we started this conversation a</p> <p>11 while ago by me asking you about your employment</p> <p>12 history, so maybe we should go back to that</p> <p>13 question. So we talked for a while about your</p> <p>14 working as an emergency room physician in hospitals</p> <p>15 in and around the New York City and New York State</p> <p>16 area.</p> <p>17 A. Yes.</p> <p>18 Q. Until, I believe you said, the mid '90s.</p> <p>19 I think you told me that at some point during the</p> <p>20 early '90s, there was overlap in your OB/GYN and</p> <p>21 pregnancy termination services work and your work</p> <p>22 with Planned Parenthood, and that continued until</p>	<p style="text-align: right;">123</p> <p>1 A. Right. That's all true.</p> <p>2 Q. Okay. Then you told me, I believe, that</p> <p>3 at some point in the mid '90s, your professional</p> <p>4 career transitioned away from emergency medicine</p> <p>5 and into solely providing pregnancy termination and</p> <p>6 gynecologic services; is that right?</p> <p>7 A. Yeah. Not just -- not just -- yeah,</p> <p>8 gynecological services, family planning services,</p> <p>9 that sort of stuff, right.</p> <p>10 Q. Okay. So what I'd like to do now is pick</p> <p>11 up where we left off at that time period.</p> <p>12 A. Okay.</p> <p>13 Q. In approximately the mid '90s, when your</p> <p>14 career shifted from a mix of emergency medicine,</p> <p>15 family planning to all family planning.</p> <p>16 A. Okay.</p> <p>17 Q. All right. Tell me who employed you and</p> <p>18 for how long.</p> <p>19 A. Okay. Who employed -- well, I told you</p> <p>20 some of the people that employed me already.</p> <p>21 What -- what year are we in now? Are you trying</p> <p>22 to --</p>
<p style="text-align: right;">122</p> <p>1 the mid '90s, I think you told me, meaning the</p> <p>2 overlap, right?</p> <p>3 A. I'm sorry, what --</p> <p>4 Q. Okay.</p> <p>5 A. -- was the overlap?</p> <p>6 Q. I'm just trying to shorten this a little</p> <p>7 bit.</p> <p>8 A. Okay.</p> <p>9 Q. So I'm going to -- I'm going to tell you</p> <p>10 what I understand about your employment history to</p> <p>11 date and then we'll pick up where I leave off and</p> <p>12 you tell me if I'm wrong. Okay.</p> <p>13 As I understand it, after you finished</p> <p>14 your internship through the New York Medical</p> <p>15 College, for several years in the late '80s and</p> <p>16 early '90s, you worked as an emergency department</p> <p>17 physician, as a hospital physician, as you've</p> <p>18 described, for hospitals such as West Point. You</p> <p>19 also were working for Planned Parenthood and</p> <p>20 providing obstetrics and gynecology services and</p> <p>21 pregnancy termination services at the same time,</p> <p>22 right? Talking late '80s, early '90s.</p>	<p style="text-align: right;">124</p> <p>1 Q. I would like to start with the time</p> <p>2 period when your practice of medicine became</p> <p>3 exclusively family planning, pregnancy termination</p> <p>4 services, whenever that was.</p> <p>5 A. Okay. All right. So go ahead.</p> <p>6 Q. I'd just like to know who you worked for</p> <p>7 and for how long you worked for each of them.</p> <p>8 A. Well, I -- I worked as an independent</p> <p>9 contractor, so I was basically practicing medicine</p> <p>10 in my own name as a physician.</p> <p>11 Q. Okay.</p> <p>12 A. So in a way, I was self-employed.</p> <p>13 Q. Okay. For whom did you work as an</p> <p>14 independent contractor?</p> <p>15 A. Oh. You want to know all the different</p> <p>16 names of all the different places that I worked as</p> <p>17 an independent contractor?</p> <p>18 Q. Yes, sir.</p> <p>19 A. I don't remember them all. I'm sorry.</p> <p>20 Q. Who -- what -- tell me all the ones you</p> <p>21 remember.</p> <p>22 A. Okay. There may -- I may be leaving some</p>

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<p>125</p> <p>1 out.</p> <p>2 Q. Okay.</p> <p>3 A. But I'll tell you the ones I can</p> <p>4 remember. I told you Planned Parenthood. I told</p> <p>5 you -- what's it called, All Women's Medical</p> <p>6 Pavilion. There was All Women's Health in --</p> <p>7 they're different than All Women's Medical</p> <p>8 Pavilion. There was Flushing Gynecology Center.</p> <p>9 There was Harrisburg Reproductive Health Services.</p> <p>10 There was Eve's Surgical Center.</p> <p>11 Q. Where is Eve's Surgical Center? What</p> <p>12 state?</p> <p>13 A. California.</p> <p>14 Q. Okay. Is that when you were working for</p> <p>15 Dr. McMahon?</p> <p>16 A. Yeah.</p> <p>17 Q. Okay.</p> <p>18 A. Oh, I'm forgetting some. Those are the</p> <p>19 ones I remember offhand.</p> <p>20 Q. Okay. And for how long did you work as</p> <p>21 an independent contractor for another entity?</p> <p>22 A. Until my license was revoked.</p>	<p>127</p> <p>1 I worked a little bit with Planned Parenthood in</p> <p>2 Trenton. In New Jersey? Alternatives in Atlantic</p> <p>3 City. I'm forgetting some of them, I know. I</p> <p>4 don't remember all of them.</p> <p>5 Q. So American Medical Services is your own</p> <p>6 company, right?</p> <p>7 A. That was my professional corporation --</p> <p>8 Q. Okay.</p> <p>9 A. -- yes.</p> <p>10 Q. Did American Medical Services have</p> <p>11 clinics where women could go for gynecologic or</p> <p>12 pregnancy termination services ever?</p> <p>13 A. American Medical Services had -- was the</p> <p>14 practicing -- when you say -- what do you mean by</p> <p>15 the words, did it have clinics?</p> <p>16 Q. Did it either own office space or lease</p> <p>17 office space where women could go to obtain those</p> <p>18 services?</p> <p>19 A. No.</p> <p>20 Q. Okay. How did you come to work -- well,</p> <p>21 I'm sorry, strike that.</p> <p>22 You said you worked for American Medical</p>
<p>126</p> <p>1 Q. Okay. In '94?</p> <p>2 A. Until my license was suspended, rather,</p> <p>3 in -- this is 2000 -- 2000 -- wait a minute --</p> <p>4 2010. Yeah, 2010. Yeah, 2010.</p> <p>5 Q. So where were you providing pregnancy</p> <p>6 termination services, leading up to the suspension</p> <p>7 of your license in 2010?</p> <p>8 A. Where?</p> <p>9 Q. What state?</p> <p>10 A. Oh. Where was I practicing?</p> <p>11 Q. Yes.</p> <p>12 A. What states was I practicing in?</p> <p>13 Q. Yes.</p> <p>14 A. Primarily, New Jersey.</p> <p>15 Q. Okay. What -- any other states?</p> <p>16 A. A little bit in Maryland --</p> <p>17 Q. Okay.</p> <p>18 A. -- we talked about that.</p> <p>19 Q. For whom were you providing pregnancy</p> <p>20 termination services or family planning services in</p> <p>21 New Jersey from 2000 to 2010?</p> <p>22 A. American Medical Associates, P.C. Also,</p>	<p>128</p> <p>1 Services, P.C., correct?</p> <p>2 A. I was an independent contractor.</p> <p>3 Q. But you were the sole owner of American</p> <p>4 Medical Services, P.C., true?</p> <p>5 A. I think so.</p> <p>6 Q. Okay. So when you were working for</p> <p>7 American Medical Services, you were, essentially,</p> <p>8 working for yourself?</p> <p>9 A. Sort of.</p> <p>10 Q. Did American Medical Services ever enter</p> <p>11 into any lease?</p> <p>12 A. Lease?</p> <p>13 Q. Yeah.</p> <p>14 A. For office? For what? Lease for what?</p> <p>15 Q. For professional space.</p> <p>16 A. No.</p> <p>17 Q. So when you were working for American</p> <p>18 Medical Services, your own company, where were you</p> <p>19 seeing patients?</p> <p>20 A. In New Jersey.</p> <p>21 Q. Where?</p> <p>22 A. What cities?</p>

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<p style="text-align: right;">129</p> <p>1 Q. Yeah.</p> <p>2 A. Well, Toms River was one. Paramus. I</p> <p>3 mean, I don't remember all the places.</p> <p>4 Q. And were providing services through</p> <p>5 another entity or just yourself?</p> <p>6 A. I was practicing as a physician when I --</p> <p>7 you asked me -- you talking about when I was</p> <p>8 practicing? When I was personally practicing,</p> <p>9 seeing patients?</p> <p>10 Q. Right. We're talking about the time</p> <p>11 period of 2000 to 2010, before your license was</p> <p>12 suspended in New Jersey. I asked who you were</p> <p>13 working for. You told me American Medical</p> <p>14 Services, P.C., Planned Parenthood and</p> <p>15 Alternatives.</p> <p>16 Can you think of any others?</p> <p>17 A. I think I told you that I -- I thought I</p> <p>18 was forgetting some, but those are the ones that</p> <p>19 came to my mind.</p> <p>20 Q. Okay. So when you were seeing patients</p> <p>21 as an employee of American Medical Services, which</p> <p>22 is a company that you were the sole owner, where</p>	<p style="text-align: right;">131</p> <p>1 Q. Okay. Who did?</p> <p>2 A. To the best of my knowledge, it was</p> <p>3 leased by American Health or American Health -- I</p> <p>4 think it was American Health. I'm not sure.</p> <p>5 Q. Do you --</p> <p>6 A. I don't remember. I don't -- you know, I</p> <p>7 don't want to guess, speculate.</p> <p>8 Q. Did you ever have any ownership interest</p> <p>9 in American Health?</p> <p>10 A. No.</p> <p>11 Q. Okay. How did you come to form a</p> <p>12 relationship with American Health, whereby you saw</p> <p>13 patients in clinics that it leased?</p> <p>14 A. Through -- what year is this we talking</p> <p>15 about?</p> <p>16 Q. I was focusing on the 2000 to 2010 time</p> <p>17 frame which is --</p> <p>18 A. Well, that's a ten-year period. I</p> <p>19 believe that was through American Medical Services.</p> <p>20 Q. So American Medical Services, a company</p> <p>21 that you are the sole owner of, entered into an</p> <p>22 agreement with American Health, whereby you would</p>
<p style="text-align: right;">130</p> <p>1 did you see those patients, at what clinics?</p> <p>2 A. I told you a couple. I mentioned Toms</p> <p>3 River. I'd mentioned Para -- I mean, you're asking</p> <p>4 the city.</p> <p>5 Q. Well, and if I were a patient who showed</p> <p>6 up to your clinic in Toms River, what would be on</p> <p>7 the door? Would it be American Medical Services,</p> <p>8 P.C., or something else?</p> <p>9 A. I think it was American Medical Services</p> <p>10 P.C., I think. I don't remember. It might have</p> <p>11 been -- there was American Health. It might have</p> <p>12 been American Health.</p> <p>13 Q. Who owns American Health?</p> <p>14 A. Not me.</p> <p>15 Q. Okay. So how did it come to be that you</p> <p>16 would see patients in Toms River at a clinic that</p> <p>17 had American Medical Services on the door?</p> <p>18 A. How did it come to be?</p> <p>19 Q. Yeah. Was that office space that you</p> <p>20 leased or that American Medical Services leased?</p> <p>21 A. American Medical Services, P.C. did not</p> <p>22 lease that space, nor did I.</p>	<p style="text-align: right;">132</p> <p>1 provide services to women in clinics that American</p> <p>2 Health leased?</p> <p>3 A. Well, that's a long sentence. First of</p> <p>4 all, these weren't licensed clinics. So I'm not</p> <p>5 sure I would call them clinics. Alternatives was a</p> <p>6 licensed clinic.</p> <p>7 Q. Okay.</p> <p>8 A. But I was -- as a practicing physician,</p> <p>9 you're asking me about, as a practicing physician,</p> <p>10 how I practiced?</p> <p>11 Q. Yes.</p> <p>12 A. So I was an independent contractor with</p> <p>13 American Medical Services.</p> <p>14 Q. You were an independent contractor with</p> <p>15 your own company?</p> <p>16 A. Yes.</p> <p>17 Q. Okay. And who did your own company,</p> <p>18 American Medical Services, have an agreement with?</p> <p>19 How did you come to use office space owned by</p> <p>20 another company or leased by another company, I</p> <p>21 should say?</p> <p>22 A. Oh. American Medical Services was a</p>

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<p style="text-align: right;">133</p> <p>1 subtenant of American Health.</p> <p>2 Q. Okay. So American Health leased space</p> <p>3 that American Medical Services subleased and you,</p> <p>4 as the owner of American Medical Services,</p> <p>5 contracted with you, Steven C. Brigham, M.D., to</p> <p>6 provide medical care to women at that facility?</p> <p>7 A. Well, that's a, sort of tortured view of</p> <p>8 it. If, I mean, American Medical Services, P.C. --</p> <p>9 so I was one of several doctors that American</p> <p>10 Medical Services, P.C. contracted with. So when I</p> <p>11 was practicing, as a practicing physician, I would</p> <p>12 get paid as a 1099 in the exact same way as all the</p> <p>13 other doctors.</p> <p>14 Q. Okay.</p> <p>15 A. So what you're asking me is, when I'm</p> <p>16 practicing, that's what I did.</p> <p>17 Q. Okay. So in terms of earning income --</p> <p>18 A. Right.</p> <p>19 Q. -- in the late -- mid to late 2000s,</p> <p>20 leading up to New Jersey suspending your license,</p> <p>21 the way that you, Steven Brigham, earned income was</p> <p>22 by working as an independent contractor for</p>	<p style="text-align: right;">135</p> <p>1 A. Right.</p> <p>2 Q. -- besides from American Medical</p> <p>3 Services, P.C.?</p> <p>4 A. Well, American Medical Services, at one</p> <p>5 point in the time -- because you're -- you have a</p> <p>6 long time frame -- at one point in time, American</p> <p>7 Medical Services, P.C. stopped that relationship</p> <p>8 with American Health.</p> <p>9 Q. Okay.</p> <p>10 A. And there was another entity, American</p> <p>11 Healthcare Services, P.C. So I don't remember when</p> <p>12 exactly, when that came about. It -- it came about</p> <p>13 when these -- there's two other doctors that came</p> <p>14 in and wanted to join American Healthcare Services,</p> <p>15 P.C. And so -- so then I would get income as a</p> <p>16 practicing physician for American Healthcare</p> <p>17 Services, P.C.</p> <p>18 Q. Were you a part owner of American</p> <p>19 Healthcare Services, P.C.?</p> <p>20 A. Was I a part owner?</p> <p>21 Q. Yeah.</p> <p>22 A. Yes.</p>
<p style="text-align: right;">134</p> <p>1 American Medical Services, your company, which had</p> <p>2 a sublease from American Health, which leased</p> <p>3 office space, true?</p> <p>4 A. That is -- that is partly true --</p> <p>5 Q. Okay.</p> <p>6 A. -- yes.</p> <p>7 Q. Now, how did American Medical Services</p> <p>8 earn money?</p> <p>9 A. American Medical Services. American</p> <p>10 Medical Services P.C., earned money -- I mean, what</p> <p>11 was their source of income?</p> <p>12 Q. Yes, sir.</p> <p>13 A. Fees from patients.</p> <p>14 Q. Okay. Did American Medical Associates</p> <p>15 ever earn money by receiving money from patients?</p> <p>16 A. Not that I -- I don't -- I don't think --</p> <p>17 I'm not sure. I don't remember. I don't think so,</p> <p>18 but I'm not sure about that because I don't</p> <p>19 remember what happened way back in the early</p> <p>20 history.</p> <p>21 Q. Did Steven C. Brigham, M.D. earn income</p> <p>22 in any way from, let's say, the year 2000 to now --</p>	<p style="text-align: right;">136</p> <p>1 Q. So you were not a part owner of American</p> <p>2 Health, but you were a part owner of American</p> <p>3 Healthcare Services, P.C.?</p> <p>4 A. Yes.</p> <p>5 Q. All right. So do you know when American</p> <p>6 Healthcare Services, P.C. was formed?</p> <p>7 A. I don't remember.</p> <p>8 Q. Okay. So if a woman showed up to one of</p> <p>9 the New Jersey clinics and paid a fee for her</p> <p>10 medical service in this 2000s' time period, to whom</p> <p>11 would the payment go?</p> <p>12 A. That depended on which year it was.</p> <p>13 Q. Okay. So if it was -- before American</p> <p>14 Healthcare Services, P.C. came into fruition, then</p> <p>15 who would it be?</p> <p>16 A. I believe it would have been American</p> <p>17 Medical Services.</p> <p>18 Q. Okay. And if it was after the</p> <p>19 formulation of American Healthcare Services, then</p> <p>20 would it be to American Healthcare Services?</p> <p>21 A. I believe so. I -- you know, it's all</p> <p>22 blurring together, so I don't -- don't hold me to</p>

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<p>137</p> <p>1 this because I'm not--</p> <p>2 Q. I'm sure.</p> <p>3 A. I'm trying to be as cooperative, but</p> <p>4 it's -- and you're taking a period of ten years.</p> <p>5 Q. So other than American Medical Services,</p> <p>6 P.C. and American Healthcare Services, P.C., since</p> <p>7 the year 2000, are there any other ways that you,</p> <p>8 Steven C. Brigham, earn income, or have earned</p> <p>9 income?</p> <p>10 A. Since the year 2000?</p> <p>11 Q. Yes, sir.</p> <p>12 A. Well, in 2000, my license was suspended,</p> <p>13 so I can't practice anymore.</p> <p>14 Q. In 2000?</p> <p>15 A. Oh, I'm sorry. 2010. I'm getting the</p> <p>16 years --</p> <p>17 Q. Okay.</p> <p>18 A. -- mixed up. Oh, in the year 2000</p> <p>19 from -- I'm sorry, repeat the question again.</p> <p>20 Q. Okay.</p> <p>21 A. From 2000 --</p> <p>22 Q. Let's go backwards for a second. Your</p>	<p>139</p> <p>1 Q. Okay.</p> <p>2 A. I can't. I mean, I'm not -- I'm not</p> <p>3 licensed. I'm not practice -- I have not practiced</p> <p>4 medicine. I haven't earned income.</p> <p>5 Q. Okay. From 2010, when Steven Brigham's</p> <p>6 license was suspended in New Jersey, until the</p> <p>7 present, has American Medical Services, P.C. earned</p> <p>8 any income?</p> <p>9 A. I don't -- no, I don't think so, but I'm</p> <p>10 not sure.</p> <p>11 Q. From 2010 until the present, has American</p> <p>12 Healthcare Services, P.C. earned any income that</p> <p>13 you have shared in as a part owner?</p> <p>14 A. From what year to what year? What --</p> <p>15 what --</p> <p>16 Q. 2000 -- we're still on 2010, when your</p> <p>17 license from New Jersey was suspended.</p> <p>18 A. That I've shared in as an owner? No.</p> <p>19 Q. From 2010 until the present, has American</p> <p>20 Medical Associates, P.C. earned any income?</p> <p>21 A. Have they earned any income?</p> <p>22 Q. Yes, sir.</p>
<p>138</p> <p>1 license was suspended in 2010.</p> <p>2 A. Correct.</p> <p>3 Q. Okay. By the State of New Jersey, before</p> <p>4 it was revoked later, correct?</p> <p>5 A. That's right.</p> <p>6 Q. Okay. Did Steven C. Brigham earn any</p> <p>7 income from the year 2000 to the present?</p> <p>8 A. 2000 to the present? That's --</p> <p>9 Q. I'm sorry.</p> <p>10 A. -- a 17-year --</p> <p>11 Q. I'm sorry. 2010 to the present. From</p> <p>12 the time your license --</p> <p>13 A. 2010 --</p> <p>14 Q. Hold on. Let me start with a fresh</p> <p>15 question, it will make it better.</p> <p>16 From 2010, when your license was</p> <p>17 suspended by the State of New Jersey, until the</p> <p>18 present, has Steven C. Brigham earned income</p> <p>19 from -- by providing professional services --</p> <p>20 A. No.</p> <p>21 Q. -- as a doctor?</p> <p>22 A. No.</p>	<p>140</p> <p>1 A. Yes.</p> <p>2 Q. Okay. From its contract with Associates</p> <p>3 in OB/GYN Care?</p> <p>4 A. From 2010?</p> <p>5 Q. Yes, sir.</p> <p>6 A. Yes.</p> <p>7 Q. Any other sources that American Medical</p> <p>8 Associates has earned income through from 2010 to</p> <p>9 the present, besides the contract with Associates</p> <p>10 in OB/GYN Care?</p> <p>11 A. Not that I remember, no.</p> <p>12 Q. Okay. So from 2010 to the present, it is</p> <p>13 fair to say that you, Dr. Brigham, have earned</p> <p>14 income through your ownership in American Medical</p> <p>15 Services and American Healthcare Services?</p> <p>16 A. Not true.</p> <p>17 Q. Okay. Correct me.</p> <p>18 A. I didn't get any income.</p> <p>19 Q. The companies received income, correct?</p> <p>20 A. Right.</p> <p>21 Q. You are the sole owner of American</p> <p>22 Medical Associates, correct?</p>

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<p>141</p> <p>1 A. Yes.</p> <p>2 Q. You're the sole owner of American Medical</p> <p>3 Services, correct?</p> <p>4 A. American Medical Services?</p> <p>5 Q. Yes.</p> <p>6 A. Yes, I was the sole owner, but I think</p> <p>7 it -- that's been defunct for a while. Okay. I</p> <p>8 don't know whether in 2000 -- I think it may have</p> <p>9 been defunct in 2010, I'm not sure. But, anyway,</p> <p>10 go ahead.</p> <p>11 Q. Who are the other owners of American</p> <p>12 Healthcare Services?</p> <p>13 A. American Healthcare Services is owned</p> <p>14 by -- I have no ownership stake in American</p> <p>15 Healthcare Services.</p> <p>16 Actually, I'm not supposed to answer</p> <p>17 questions -- I'm not going to answer questions</p> <p>18 about ownership in New Jersey. This is that whole</p> <p>19 thing with my attorney.</p> <p>20 Q. So --</p> <p>21 A. But I don't -- I have no -- I personally</p> <p>22 have no ownership in any professional corporation</p>	<p>143</p> <p>1 THE VIDEOGRAPHER: Do you want to go off</p> <p>2 the record?</p> <p>3 MS. MALARKEY: Just for a moment.</p> <p>4 THE VIDEOGRAPHER: We're going off the</p> <p>5 record, the time is 12:03 p.m.</p> <p>6 (Brigham Exhibit 2 was marked for</p> <p>7 identification and is attached to the transcript.)</p> <p>8 THE VIDEOGRAPHER: We are back on the</p> <p>9 record, the time is 12:07 p.m.</p> <p>10 BY MS. MALARKEY:</p> <p>11 Q. Okay. Dr. Brigham, I think I asked you,</p> <p>12 who -- who were the other owners of American</p> <p>13 Healthcare Services, P.C.</p> <p>14 A. And I said that I've been advised by my</p> <p>15 New Jersey counsel not to answer questions outside</p> <p>16 of the State of Maryland.</p> <p>17 Q. Right. And I don't think, respectfully,</p> <p>18 that that question deals with a matter outside of</p> <p>19 the State of Maryland. I asked you who shares in</p> <p>20 an ownership in a company that you partly own.</p> <p>21 A. Right. But it -- this is a -- this is a</p> <p>22 New Jersey company that's not -- that's completely</p>
<p>142</p> <p>1 in New Jersey.</p> <p>2 Q. But you used to have partial ownership in</p> <p>3 American Healthcare Services, right?</p> <p>4 A. I'm sorry, what did you say?</p> <p>5 Q. I thought you told me previously that</p> <p>6 American Healthcare Services, P.C., you were a part</p> <p>7 owner in?</p> <p>8 MR. GREANEY: You can speak to that</p> <p>9 because you already did testify to that --</p> <p>10 A. Yes --</p> <p>11 MR. GREANEY: -- prior.</p> <p>12 A. -- I was.</p> <p>13 Q. Who were the other part owners of that</p> <p>14 company?</p> <p>15 A. I am going to decline to answer more</p> <p>16 questions about American Healthcare Services under</p> <p>17 the advice of my -- the New Jersey counsel.</p> <p>18 MS. MALARKEY: Can we mark that as an</p> <p>19 exhibit?</p> <p>20 MR. GREANEY: Sure.</p> <p>21 MS. MALARKEY: So let's just take a break</p> <p>22 for a minute and mark these.</p>	<p>144</p> <p>1 outside of Maryland.</p> <p>2 Q. Okay. So you're not -- you're not going</p> <p>3 to tell me, sitting here today, who co-owns a</p> <p>4 company with you?</p> <p>5 A. Well, I don't own American Healthcare</p> <p>6 Services --</p> <p>7 Q. Okay.</p> <p>8 A. -- P.C.</p> <p>9 Q. At the time that you did have an</p> <p>10 ownership interest in American Healthcare Services,</p> <p>11 will you share with me the other individuals that</p> <p>12 also owned that company with you?</p> <p>13 A. There -- I should answer this?</p> <p>14 There were two other doctors that for --</p> <p>15 and it changed over time. So, you know, it wasn't</p> <p>16 one thing at one time, but there were two doctors</p> <p>17 who became part owners or entered into a</p> <p>18 relation -- ownership relationship with me in</p> <p>19 American Healthcare Services, P.C. at some point in</p> <p>20 time. And I don't -- I can't tell you the dates.</p> <p>21 I don't remember exactly all of those.</p> <p>22 Q. Right. Sir, my question was what are</p>

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<p>145</p> <p>1 their names?</p> <p>2 A. One is Dr. Leiblich.</p> <p>3 Q. How do you spell that, if you know?</p> <p>4 A. L-i-e-b-l-i-c-h, something like that.</p> <p>5 And Dr. Gelfand.</p> <p>6 Q. How do you spell Dr. Gelfand's name?</p> <p>7 A. G-e-l-f-a-n-d.</p> <p>8 Q. What is Dr. Leiblich's first name?</p> <p>9 A. I don't remember.</p> <p>10 Q. How about Dr. Gelfand?</p> <p>11 A. Tony.</p> <p>12 Q. So in terms of your work history -- and</p> <p>13 I'm again focusing on the years 2000, when you</p> <p>14 formed American Medical Associates, and 2010 when</p> <p>15 your license was revoked by New Jersey -- I'm</p> <p>16 sorry, suspended by the State of New Jersey, can</p> <p>17 you recall any other ways in which you worked, or</p> <p>18 were employed, besides being an independent</p> <p>19 contractor for your own company, American Medical</p> <p>20 Services; Planned Parenthood and Alternatives in</p> <p>21 Atlantic City?</p> <p>22 A. I'm -- there may have been. You're</p>	<p>147</p> <p>1 operating.</p> <p>2 Q. Okay.</p> <p>3 A. But I didn't gain any money from it.</p> <p>4 Q. Okay. So what -- what have you done</p> <p>5 professionally to occupy your time since your</p> <p>6 license was suspended by New Jersey in 2010?</p> <p>7 You've run American Medical Associates, P.C.,</p> <p>8 correct?</p> <p>9 A. Yes.</p> <p>10 Q. Okay.</p> <p>11 A. Did do that for a while, but then that</p> <p>12 went defunct. This is since 2010, you said?</p> <p>13 Q. Correct.</p> <p>14 A. Well, I spent a lot of time with</p> <p>15 attorneys.</p> <p>16 Q. I'd like to know what you've done</p> <p>17 professionally with your time, if anything, other</p> <p>18 than running your company, American Medical</p> <p>19 Associates, P.C., since 2010?</p> <p>20 A. I'm answering you. I consider --</p> <p>21 Q. Okay.</p> <p>22 A. I consider pro -- I consider defending my</p>
<p>146</p> <p>1 talking about a ten-year period. I just -- I</p> <p>2 can't -- I don't want to --</p> <p>3 Q. Okay.</p> <p>4 A. -- speculate. I can't remember.</p> <p>5 Q. And were you employed in any capacity</p> <p>6 from 2010, when your license was suspended in</p> <p>7 New Jersey, to the present?</p> <p>8 A. As a physician, no.</p> <p>9 Q. In any other way?</p> <p>10 A. Oh, I did not receive -- I have not</p> <p>11 received any other compensation that I can</p> <p>12 remember.</p> <p>13 Q. Have you worked as a doctor since 2010?</p> <p>14 A. No.</p> <p>15 Q. Have you provided any patient care since</p> <p>16 2010?</p> <p>17 A. No. I didn't have a license.</p> <p>18 Q. Have you operated American Medical</p> <p>19 Associates since 2010?</p> <p>20 A. Yes.</p> <p>21 Q. Okay.</p> <p>22 A. American Medical Associates was</p>	<p>148</p> <p>1 license something I've been doing professionally</p> <p>2 with my time.</p> <p>3 Q. Fair enough.</p> <p>4 A. Went through a hearing and a lot of stuff</p> <p>5 for that. I worked on American Medical Associates.</p> <p>6 I worked -- I don't remember. Other things. I</p> <p>7 took some continuing education courses. I helped</p> <p>8 Dr. Kaji in New Jersey a little bit.</p> <p>9 Q. What do you mean, you helped Dr. Kaji in</p> <p>10 New Jersey a little bit?</p> <p>11 A. Well, again, I don't -- actually, I don't</p> <p>12 want to -- because I've been advised not to discuss</p> <p>13 New Jersey, I'm not going to comment on that.</p> <p>14 Q. What -- when you say, you helped him,</p> <p>15 though, in what capacity did you help him?</p> <p>16 A. Not as a physician. I did not practice</p> <p>17 medicine.</p> <p>18 Q. Okay. Has American Medical Services,</p> <p>19 P.C. -- well, sorry, strike that.</p> <p>20 Is American Medical Services, P.C. still</p> <p>21 a functional corporation?</p> <p>22 A. No.</p>

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<p>149</p> <p>1 Q. When did it become defunct?</p> <p>2 A. I don't remember, but years ago. May</p> <p>3 have been before 2010. I think it was before 2010.</p> <p>4 Q. I'm sorry, I -- I interrupted your answer</p> <p>5 with Dr. Kaji. You were telling me the -- the ways</p> <p>6 in which you've occupied your professional time</p> <p>7 since 2010. I don't know if you ever finished your</p> <p>8 answer.</p> <p>9 A. I told you the things that I could</p> <p>10 remember. There may be--</p> <p>11 Q. Okay.</p> <p>12 A. -- other things that I -- I mean, it's a</p> <p>13 seven-year period of time.</p> <p>14 Q. Um-hum. Does American Medical</p> <p>15 Associates, or did it ever conduct business at</p> <p>16 157 South Main Street in Phillipsburg, New Jersey?</p> <p>17 A. No.</p> <p>18 Q. Have you ever seen patients at that</p> <p>19 address?</p> <p>20 A. Ever?</p> <p>21 Q. Yes.</p> <p>22 A. Yes.</p>	<p>151</p> <p>1 to refresh his memory?</p> <p>2 MS. MALARKEY: Yeah. We can have this</p> <p>3 marked as Exhibit 3 when we take a break.</p> <p>4 A. All right.</p> <p>5 Q. I'm looking at Paragraph 9.</p> <p>6 A. Paragraph 9. It says -- yeah.</p> <p>7 Q. Okay.</p> <p>8 A. Right.</p> <p>9 Q. Are you familiar with the 157 South Main</p> <p>10 Street address that's listed in Paragraph Number 9?</p> <p>11 A. Let me-- excuse me, I'm just reading the</p> <p>12 paragraph.</p> <p>13 Q. Um-hum.</p> <p>14 (Brigham Exhibit 3 was marked for</p> <p>15 identification and is attached to the transcript.)</p> <p>16 A. Yeah, Paragraph 9 is true.</p> <p>17 Q. Right. I'm not asking you if that</p> <p>18 paragraph is true, sir. I'm just asking you if</p> <p>19 you're familiar with what exists at the 157 South</p> <p>20 Main Street, Phillipsburg, New Jersey, address.</p> <p>21 Are you familiar with that address?</p> <p>22 A. Yes.</p>
<p>150</p> <p>1 Q. When?</p> <p>2 A. When?</p> <p>3 Q. Yes.</p> <p>4 A. Oh, gosh. When I was licensed.</p> <p>5 Q. Okay. And that address, the one in</p> <p>6 Phillipsburg, New Jersey, 157 South Main Street, is</p> <p>7 that the address of a medical clinic?</p> <p>8 A. No.</p> <p>9 Q. What is -- is it a residential address?</p> <p>10 A. I think there's an office there.</p> <p>11 Q. Okay. What -- office of whom?</p> <p>12 A. Well, again, I'm not supposed to testify</p> <p>13 outside of Maryland. You're asking me stuff about</p> <p>14 New Jersey, so I'm going to decline to answer.</p> <p>15 Q. Okay. Respectfully, sir, you have signed</p> <p>16 an affidavit already in this case speaking about</p> <p>17 that address --</p> <p>18 A. Okay.</p> <p>19 Q. -- and your affiliation with it. So --</p> <p>20 A. What did I say? Whatever I said was</p> <p>21 true.</p> <p>22 MR. GREANEY: Can he review the affidavit</p>	<p>152</p> <p>1 Q. Have you seen patients there?</p> <p>2 A. Not for many years.</p> <p>3 Q. Okay. You used to? Did you used to?</p> <p>4 A. Oh, years ago, yes.</p> <p>5 Q. All right. And when you saw patients</p> <p>6 years ago in Phillipsburg, New Jersey, what was the</p> <p>7 name of the clinic or the business that you were</p> <p>8 seeing patients at?</p> <p>9 A. I was seeing patients -- well, it</p> <p>10 changed. Which year do you mean?</p> <p>11 Q. Any of them. If it changed, you can tell</p> <p>12 me it changed.</p> <p>13 A. Well, again, you know, you keep asking me</p> <p>14 about New Jersey. I'm going to respectfully</p> <p>15 decline to discuss New Jersey.</p> <p>16 Q. Sir, I'm asking you about your work</p> <p>17 history. Okay.</p> <p>18 A. Okay.</p> <p>19 Q. If you saw --</p> <p>20 A. I saw patients in -- at 157 South Main</p> <p>21 Street, when I was licensed. Not -- I haven't</p> <p>22 done--</p>

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<p>153</p> <p>1 Q. Okay.</p> <p>2 A. I haven't seen them in almost a decade.</p> <p>3 Q. Right. And what I'd like to know is,</p> <p>4 when you were seeing patients at that address --</p> <p>5 A. On behalf of who?</p> <p>6 Q. Yes.</p> <p>7 A. At the end, it was on behalf of American</p> <p>8 Healthcare Services, P.C.</p> <p>9 Q. Okay. How about this -- still in</p> <p>10 Paragraph 9, 324 Fort Duquesne Boulevard in</p> <p>11 Pittsburgh, Pennsylvania, is that a residential or</p> <p>12 a business address?</p> <p>13 A. That is a business address.</p> <p>14 Q. Okay. Have you ever seen patients at</p> <p>15 that business address?</p> <p>16 A. No.</p> <p>17 Q. What business is located at that address,</p> <p>18 just AMA?</p> <p>19 A. I don't know that any business is located</p> <p>20 there now.</p> <p>21 Q. Do you have any ownership interest in</p> <p>22 that Pittsburgh property?</p>	<p>155</p> <p>1 A. There was an office for AMA's business</p> <p>2 affairs.</p> <p>3 Q. Okay. And why did you choose that</p> <p>4 address for AMA's business affairs?</p> <p>5 A. Because we needed a -- AMA was a</p> <p>6 Pennsylvania entity.</p> <p>7 Q. Um-hum. Who is we? You keep saying, we</p> <p>8 needed, we needed. Who's we?</p> <p>9 A. I guess I meant me. I don't know.</p> <p>10 Q. Okay.</p> <p>11 A. AMA--AMA--AM--I'm thinking about it</p> <p>12 in terms of the entity.</p> <p>13 Q. Okay. But you've told me that you didn't</p> <p>14 own that property, so I'm--I'm curious as to what</p> <p>15 connection did you have with this property that led</p> <p>16 you to choose it as the corporate office for your</p> <p>17 company.</p> <p>18 A. AMA--why did AMA choose to use</p> <p>19 Fort Duquesne as its corporate office --</p> <p>20 Q. Sure.</p> <p>21 A. --to receive mail and that sort of</p> <p>22 stuff?</p>
<p>154</p> <p>1 A. No.</p> <p>2 Q. Have you ever had an ownership interest</p> <p>3 in that Pittsburgh property?</p> <p>4 A. No.</p> <p>5 Q. Why did you, when you formed AMA in 2000,</p> <p>6 list 324 Fort Duquesne Boulevard, Number 320,</p> <p>7 Pittsburgh, as its corporate office?</p> <p>8 A. Why? Because we -- we -- so we wouldn't</p> <p>9 have to pay a -- what do you call it -- a -- it</p> <p>10 was -- that was the -- I think that was the office</p> <p>11 and I don't remember -- would you repeat the</p> <p>12 question? I think it was the office for service of</p> <p>13 process, wasn't it? No, it was Hamilton. I don't</p> <p>14 remember offhand. I couldn't answer your question.</p> <p>15 Q. Well, you say in Paragraph 9, AMA's</p> <p>16 corporate office was located -- and you give the</p> <p>17 Fort Duquesne Boulevard address.</p> <p>18 A. Right.</p> <p>19 Q. Do you see that?</p> <p>20 A. Yeah.</p> <p>21 Q. Okay. Was there an actual office located</p> <p>22 at that address for your company?</p>	<p>156</p> <p>1 Q. Yeah.</p> <p>2 A. AMA wanted a location where -- that was</p> <p>3 in Pennsylvania. We needed a Pennsylvania address.</p> <p>4 Q. But what connection did AMA have with</p> <p>5 this specific address on Fort Duquesne Boulevard,</p> <p>6 which you did not own?</p> <p>7 A. Oh. AMA had an office there.</p> <p>8 Q. So did AMA lease that property?</p> <p>9 A. AMA leased an office there.</p> <p>10 Q. Did AMA ever lease an office on</p> <p>11 Toll House Avenue in Frederick, Maryland?</p> <p>12 A. AMA provided doctors to Associates in</p> <p>13 OB/GYN Care at the Toll House, Frederick, Maryland,</p> <p>14 address.</p> <p>15 Q. Okay. Listen to my question. Did AMA</p> <p>16 ever lease office space on Toll House Avenue in</p> <p>17 Frederick, Maryland?</p> <p>18 A. I don't think they signed a lease.</p> <p>19 Q. Did American Medical Services ever lease</p> <p>20 property on Toll House Avenue in Frederick,</p> <p>21 Maryland?</p> <p>22 A. No.</p>

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1 Q. Did any other corporation with -- in
2 which you have any ownership interest whatsoever
3 lease property on Toll House Avenue in Frederick,
4 Maryland?
5 **A. No, not that I remember.**
6 Q. Okay. I'm going to ask the same
7 questions about some other addresses so that we can
8 be efficient.
9 **A. Okay.**
10 Q. Okay. I'd like to know for 3506 North
11 Calvert Street in Baltimore City, Maryland, whether
12 AMA, AMS, American Medical Services; or any other
13 company that you have ever owned or partly owned
14 has ever entered into a lease for space at that
15 address.
16 **A. Not that I remember, no.**
17 Q. Did you ever, or any of your companies,
18 AMA or American Medical Services, or any other
19 company ever purchase property at 3506 North
20 Calvert Street in Baltimore City?
21 **A. A -- no, not that I can remember. AMA**
22 **did not purchase -- AMS, first of all, had nothing**

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1 **to do with Maryland. And AMA did not purchase any**
2 **property at -- what was that address, North Calvert**
3 **Street?**
4 Q. Yes, sir.
5 **A. Yes.**
6 Q. Did AMA ever purchase any real property?
7 **A. No.**
8 Q. Did AMA ever enter into any lease for
9 real property?
10 **A. I don't think so.**
11 Q. Did AMA --
12 **A. I don't -- I mean --**
13 Q. Sorry?
14 **A. -- you know, it's a 17-year history. I**
15 **don't remember, but I don't think so.**
16 Q. Did AMA, AMS or any other company that
17 you have owned or partly owned ever buy or enter
18 into a lease for space at 6005 Landover Road in
19 Cheverly, Maryland?
20 **A. Well, that's AM -- first of all, let's**
21 **break that down. AMS didn't ever have anything to**
22 **do with anything in Maryland, so I've covered that.**

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1 **AMA also did not ever lease any property**
2 **that I can remember that -- I don't think it's ever**
3 **leased any property anywhere.**
4 Q. Okay.
5 **A. That I can think of.**
6 Q. Has any company that you have ever had an
7 ownership interest in leased property -- property
8 in Cheverly, Maryland, or purchased property in
9 Cheverly, Maryland?
10 **A. I don't think so, no.**
11 Q. Okay. Has AMA, AMS or any other company
12 that you've owned or partly owned ever leased or
13 purchased property in Silver Spring, Maryland?
14 **A. Has -- say that again. Has AMA, AMS --**
15 Q. AMA, AMS or any other company that you
16 have owned or partly owned ever entered into any
17 lease or purchased property in Silver Spring,
18 Maryland?
19 **A. Not that I -- I mean, they definitely**
20 **never purchased any property. Now, I don't**
21 **remember them ever entering into any lease that I**
22 **can think of.**

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1 Q. Have you ever been to a family planning
2 clinic located at 9801 Georgia Avenue in
3 Silver Spring, Maryland?
4 **A. I don't know where that address is, so I**
5 **can't -- I can't speak specifically to that**
6 **address.**
7 Q. Have you ever visited any family clinic
8 in Silver Spring, Maryland?
9 **A. Yes, I have.**
10 Q. Okay. Where?
11 **A. There was a family planning clinic in**
12 **Silver Spring, Maryland, that -- I don't remember**
13 **the address that I went to.**
14 Q. Why did you go to the family planning
15 clinic in Silver Spring that you went to?
16 **A. Because AMA was providing doctors to it.**
17 Q. Okay. Pursuant to its contract with
18 Associates in OB/GYN Care, or a different
19 agreement?
20 **A. That agreement.**
21 Q. Okay. What are the locations of the
22 Maryland clinics for which AMA was providing

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<p>1 physician services to Associates in OB/GYN Care?</p> <p>2 A. Say -- say that again. What are the --</p> <p>3 what was the question? What were the -- what are</p> <p>4 the --</p> <p>5 Q. Your company, AMA --</p> <p>6 A. Yes.</p> <p>7 Q. -- as you said, entered into an agreement</p> <p>8 with Associates in OB/GYN Care to provide</p> <p>9 physicians' services, right?</p> <p>10 A. Yeah.</p> <p>11 Q. Do you know where were the Maryland</p> <p>12 clinics that those physicians staffed, or went to?</p> <p>13 A. I don't know the exact addresses off the</p> <p>14 top of my head.</p> <p>15 Q. Do you know cities?</p> <p>16 A. Yes.</p> <p>17 Q. Where?</p> <p>18 A. The cities that you just mentioned. I</p> <p>19 think there was one in, I think, Baltimore. There</p> <p>20 was one in -- there was one in -- I think there was</p> <p>21 one in Frederick. One in Silver Spring.</p> <p>22 Q. Um-hum.</p>	<p>1 A. Well, we would -- if a doctor contacted</p> <p>2 us, we would, first, you know, verify their</p> <p>3 license, verify their -- would look them up. See</p> <p>4 if there's a history to the doctor. We would ask</p> <p>5 to see their credentials. We'd ask for a</p> <p>6 curriculum vitae. We'd ask for if they have Board</p> <p>7 certification.</p> <p>8 We would interview. I would usually</p> <p>9 interview the doctor by telephone. We would do a</p> <p>10 national practitioner databank query.</p> <p>11 And -- and then if everything seemed</p> <p>12 fine -- and we would give them -- then we would</p> <p>13 give them an independent contractor agreement, if</p> <p>14 they wanted to -- to join AMA. And then -- but</p> <p>15 before they would start, I would go and meet them</p> <p>16 in person usually.</p> <p>17 Q. Okay.</p> <p>18 A. So that's how I would -- cause mean</p> <p>19 occasion to go to the facility.</p> <p>20 Q. You'd meet them at the facility?</p> <p>21 A. At the facility or near the facility or</p> <p>22 something --</p>
<p>1 A. And one in Cheverly, I think.</p> <p>2 Q. And what occasioned you to go physically</p> <p>3 to those locations?</p> <p>4 A. Well, as part of the due diligence of</p> <p>5 recruiting doctors and hiring doctors, we would --</p> <p>6 I would go there to meet the doctor, interview the</p> <p>7 doctor, that sort of stuff.</p> <p>8 Q. Okay.</p> <p>9 A. I know I went to the -- well, anyway,</p> <p>10 that's the answer.</p> <p>11 Q. So if I'm following you, when you hired</p> <p>12 doctors to staff those clinics, you went down to</p> <p>13 visit the clinics to make sure that everything was</p> <p>14 going smoothly and okay?</p> <p>15 A. When we hired them, we would do a number</p> <p>16 of things, you know, as part of the credentialing</p> <p>17 process, I guess you'd say.</p> <p>18 Q. Okay. Tell me what you'd do, when you</p> <p>19 hired a doctor. This is -- and when you say, you,</p> <p>20 you're talking about AMA, right?</p> <p>21 A. AMA.</p> <p>22 Q. Okay.</p>	<p>1 Q. Okay.</p> <p>2 A. -- like that.</p> <p>3 Q. So if a doctor contacted AMA, is</p> <p>4 expressing an interest in working with AMA, you</p> <p>5 would be the one who would interview that person,</p> <p>6 correct?</p> <p>7 A. One of the people, yeah.</p> <p>8 Q. Who were the others?</p> <p>9 A. It depended on what year it was and who</p> <p>10 was -- who was there. It would depend. It changed</p> <p>11 over time.</p> <p>12 Q. Okay. Tell me who you can recall. Who</p> <p>13 helped you with that process of hiring doctors to</p> <p>14 work for AMA as independent contractors?</p> <p>15 A. Dr. Panna did. He was the medical</p> <p>16 director.</p> <p>17 Q. Dr. Panna was the medical director for</p> <p>18 AMA?</p> <p>19 A. Dr. Panna was the medical director of</p> <p>20 Associates.</p> <p>21 Q. Dr. Panna was the medical director of</p> <p>22 Associates in OB/GYN Care?</p>

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1 **A. Yeah.**
 2 Q. Okay.
 3 **A. I think so. That's right, he was.**
 4 Q. How about Dr. Kaji--
 5 **A. Dr. --**
 6 Q. -- who is he?
 7 **A. -- Kaji had no connection to Maryland in**
 8 **any way.**
 9 Q. Okay. So when someone would contact you,
 10 American Medical Associates, expressing an interest
 11 in working as a physician, am I correct that either
 12 you or Dr. Panna would interview them?
 13 **A. Me or Dr. Panna. Dr. Walker might talk**
 14 **to them.**
 15 Q. Okay.
 16 **A. I'm trying to remember who else would get**
 17 **involved. Sometimes -- I mean, it depends who they**
 18 **called and who they spoke to. Sometimes the, you**
 19 **know, people on the staff would --**
 20 Q. Okay.
 21 **A. -- talk to them.**
 22 MR. GREANEY: To clarify, was this more

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1 of a two part -- two-part process where you're --
 2 you're making a hire to staff them to these
 3 facilities, but the medical director of the
 4 facility would also interview them before they
 5 began working there?
 6 THE WITNESS: Sometimes.
 7 MS. MALARKEY: Okay. Well, let's not
 8 testify for him.
 9 THE WITNESS: And it changed -- it
 10 changed over time.
 11 MR. GREANEY: Okay.
 12 THE WITNESS: So she's -- sometimes,
 13 because when Dr. Panna came on and became medical
 14 director, he would -- he would do that.
 15 MR. GREANEY: Just wanted to clarify.
 16 BY MS. MALARKEY:
 17 Q. When did Dr. Panna become medical
 18 director for Associates in OB/GYN Care?
 19 **A. I don't remember which year it was.**
 20 Q. All right.
 21 (Telephone interruption.)
 22 **A. Sorry. Sorry. I can't talk right now.**

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1 **Go ahead.**
 2 Q. Did you know Dr. Panna before he became
 3 the medical director for Associates in OB/GYN Care?
 4 **A. I don't think so.**
 5 Q. Do you know who was the medical director
 6 for Associates in OB/GYN Care before it was
 7 Dr. Panna?
 8 **A. I don't remember.**
 9 Q. So am I correct that your two main points
 10 of contact with Associates in OB/GYN Care were
 11 Dr. Panna and Dr. Walker?
 12 **A. On medical stuff, yeah, that's true.**
 13 Q. How about on nonmedical stuff?
 14 **A. On administrative things?**
 15 Q. Sure.
 16 **A. There was Nancy, I talked with her**
 17 **sometimes too.**
 18 Q. What is Nancy's lastname?
 19 **A. I don't remember.**
 20 Q. How about Melissa Scachnovitz,
 21 S-c-a-c-h-n-o-v-i-t-z, do you know her?
 22 **A. I don't remember that -- there was a**

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1 **Melissa, but I don't know the last name.**
 2 Q. Do you know who that Melissa was or what
 3 her association was with Associates in OB/GYN Care?
 4 **A. I'm not sure. I don't want to speak**
 5 **exactly.**
 6 Q. Now, you mentioned that there was an
 7 independent contractor agreement that you would --
 8 that AMA would sign with the physician if he or she
 9 was retained or hired?
 10 **A. Right.**
 11 Q. Okay. Who drafted that agreement?
 12 **A. An attorney.**
 13 Q. Okay. It was a written document, like a
 14 written contract that --
 15 **A. Yes.**
 16 Q. -- would be signed?
 17 **A. Yes.**
 18 Q. And who would sign it?
 19 **A. The doctor.**
 20 Q. Okay. And would A -- you sign on behalf
 21 of AMA?
 22 **A. Yes. Usually, yes.**

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<p style="text-align: right;">169</p> <p>1 Q. So getting back to our original</p> <p>2 discussion, you had occasion to come to Maryland to</p> <p>3 visit the four clinics that were associated with</p> <p>4 Associates in OB/GYN Care when you would follow up</p> <p>5 to make sure that the doctors you retained on</p> <p>6 behalf of AMA were comfortable and appropriate and</p> <p>7 everything was going smoothly?</p> <p>8 A. I'm sorry, I -- I wanted to make sure</p> <p>9 that I -- I -- usually it was at the initial</p> <p>10 hiring --</p> <p>11 Q. Uh-huh.</p> <p>12 A. -- time.</p> <p>13 Q. Okay.</p> <p>14 A. Unless there was some issue or some</p> <p>15 problem or something, but I usually didn't have</p> <p>16 much contact with -- if everything went fine, then</p> <p>17 the doctors, you know, we had to credential them</p> <p>18 and verify --</p> <p>19 Q. Um-hum.</p> <p>20 A. -- them and that sort of stuff.</p> <p>21 Q. So after you credentialed the doctor and</p> <p>22 verified the doctor and visited the doctor at one</p>	<p style="text-align: right;">171</p> <p>1 of all, I want to qualify, when you're asking me</p> <p>2 these questions, I'm thinking about the time when</p> <p>3 AMA was working in this contract with Associates.</p> <p>4 So the time before that --</p> <p>5 Q. No, we're on the same page.</p> <p>6 A. -- you know --</p> <p>7 Q. I'm talking about that time too.</p> <p>8 A. Yeah, but I -- okay. But I just want to</p> <p>9 make -- clarify, the time before that is kind of a</p> <p>10 black -- I don't -- can't even remember what the</p> <p>11 heck was going on back in -- before that.</p> <p>12 All right. Let's go ahead.</p> <p>13 Q. In the time frame that AMA was in this</p> <p>14 contract with Associates in OB/GYN Care to provide</p> <p>15 physician services for the clinics in Maryland --</p> <p>16 A. Yes.</p> <p>17 Q. -- did AMA have any employees?</p> <p>18 A. Not that I remember.</p> <p>19 Q. Okay. Did it have any nonphysician</p> <p>20 independent contractors?</p> <p>21 A. Not that I remember.</p> <p>22 Q. Did AMA have Christmas parties, host</p>
<p style="text-align: right;">170</p> <p>1 of the locations in Maryland, would you have any</p> <p>2 further contact with either the doctor or those</p> <p>3 clinics in Maryland?</p> <p>4 A. Not unless the doctor called up with some</p> <p>5 kind of problem or something.</p> <p>6 Q. Did AMA have Christmas parties for its --</p> <p>7 strike that. Let me back up for a second.</p> <p>8 A. Oh, yes, you're right. Christmas</p> <p>9 parties.</p> <p>10 Q. Did AMA have employees?</p> <p>11 A. It -- no, not in -- not any W -- W --</p> <p>12 what is it, W-2, W-4 employees? It was just 1099,</p> <p>13 independent contractors.</p> <p>14 Q. Just independent contractors?</p> <p>15 A. Right.</p> <p>16 Q. Okay. Were the only independent</p> <p>17 contractors that AMA had physicians, or were there</p> <p>18 nonphysician independent contractors?</p> <p>19 A. I don't remember -- I think they were all</p> <p>20 just physicians.</p> <p>21 Q. Okay.</p> <p>22 A. You know, you're -- it's going -- first</p>	<p style="text-align: right;">172</p> <p>1 Christmas parties?</p> <p>2 A. There were Christmas parties and I would</p> <p>3 attend them.</p> <p>4 Q. Who would -- go ahead. I'm sorry, I</p> <p>5 didn't mean to cut you --</p> <p>6 A. Go ahead.</p> <p>7 Q. You sounded like you weren't finished.</p> <p>8 I'm sorry.</p> <p>9 A. Well, they -- those parties were jointly</p> <p>10 with -- because employees of Associates would</p> <p>11 attend and the doctors -- because the doctors were</p> <p>12 attending, I would attend too.</p> <p>13 Q. But you would attend the Christmas</p> <p>14 parties that were being thrown by Associates in</p> <p>15 OB/GYN Care for their staff?</p> <p>16 A. Well, these were parties for the people</p> <p>17 that worked there, let's put it that way.</p> <p>18 Q. Okay.</p> <p>19 A. And -- and the doctors, like Dr. Panna,</p> <p>20 for example, and the other doctors would attend, so</p> <p>21 I would often attend. I didn't always attend, but</p> <p>22 I sometimes attended.</p>

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<p>173</p> <p>1 Q. Did you ever agree to be the resident 2 agent for Associates in OB/GYN Care in Maryland?</p> <p>3 A. I don't remember.</p> <p>4 Q. Um-hum. Do you know why the State of 5 Maryland would have you listed as the residential 6 agent for Associates in OB/GYN Care?</p> <p>7 A. If they did have me listed, then I guess 8 it would be I must have agreed to it.</p> <p>9 Q. Okay. So we have -- going back to AMA 10 for a second. We have talked about -- I think you 11 told me earlier that when it was first formed -- 12 and we saw this on Exhibit 1 A -- the Hamilton 13 Street, Allentown, Pennsylvania, address was 14 provided to the State of Pennsylvania.</p> <p>15 In Exhibit 3, your affidavit filed in 16 this case, you've stated that the corporate office 17 for AMA was the Fort Duquesne Boulevard address in 18 Pittsburgh, Pennsylvania.</p> <p>19 And earlier in your deposition testimony, 20 you told me that you would consider the 21 Alpha Avenue, Voorhees, New Jersey, address as the 22 principal place of business for AMA.</p>	<p>175</p> <p>1 provided physicians, I told you, to those four 2 facilities. And I think you showed me something 3 that -- that -- I don't know what address -- I 4 think AMA's address in Maryland was the Toll House 5 Road address.</p> <p>6 Q. Um-hum.</p> <p>7 A. I think we -- I think you need an 8 address -- we needed -- I think the lawyer, the 9 Maryland lawyers wanted a Maryland address for AMA, 10 so there was that address.</p> <p>11 Q. Toll House Road being the one in 12 Frederick?</p> <p>13 A. Yeah, in Frederick. But, you know, 14 anyway --</p> <p>15 Q. Do you know an individual named 16 Sabreena Zan, Z-a-n?</p> <p>17 A. No.</p> <p>18 Q. How about Tonya Thomas?</p> <p>19 A. No. Not offhand, not that I remember.</p> <p>20 Q. Do you know anyone with the initials DB 21 who works at the Silver Spring Associates in OB/GYN 22 Care office?</p>
<p>174</p> <p>1 Have we -- are those three addresses the 2 main addresses for AMA for all of its existence 3 since 2000?</p> <p>4 A. Well, I don't know what you mean by the 5 main in -- addresses. And each of those statements 6 I think were all true, what you just said.</p> <p>7 I'm not sure how to answer -- respond to 8 your -- first of all, you're talking over a 17-year 9 period of time and some of these are -- addresses 10 went and changed and whatnot, so --</p> <p>11 Q. What I'd like to know is, what are the 12 principal business addresses for your company, AMA, 13 from 2000 to the present. I don't want to cover 14 the three we've already discussed. But are there 15 any others, besides Pittsburgh, Allentown, 16 Voorhees?</p> <p>17 A. Business addresses? Well, I mean, that 18 depends how you define, business address, I mean --</p> <p>19 Q. Either registered with the state or where 20 they conduct business.</p> <p>21 A. Well, the AMA in Maryland conducted -- I 22 mean, in the sense, they conducted business, they</p>	<p>176</p> <p>1 A. I don't. But I don't know the -- you 2 know, I wouldn't necessarily know them. I don't 3 know what they -- no. The answer is no.</p> <p>4 Q. Do you know why a person with those 5 initials or any person at the Silver Spring office 6 of Associates in OB/GYN Care would indicate they 7 could fax you papers?</p> <p>8 A. I don't know -- I can't speak to why 9 they -- people would say what they would say.</p> <p>10 Q. Do the staff at the Maryland clinics of 11 Associates in OB/GYN Care have your contact 12 information?</p> <p>13 A. There are no clinics, as I understand it, 14 of Associates in OB/GYN Care in Maryland right now.</p> <p>15 Q. At the time that there were, did the 16 staff of those clinics know how to reach you, if 17 they needed you?</p> <p>18 A. I don't think so, but it's -- I mean, the 19 doctors did. So maybe the doctors could have given 20 them -- I don't know what they did.</p> <p>21 Q. Do you know who employed or paid the 22 paychecks of the nonphysician staff who worked at</p>

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<p>177</p> <p>1 the Maryland Associates in OB/GYN Care clinics?</p> <p>2 A. I think it was Associates in OB/GYN Care,</p> <p>3 but I -- and it may have changed over time. I</p> <p>4 don't know. I'm not sure.</p> <p>5 Q. Has AMA conducted business in any</p> <p>6 other -- I understand that it's registered in</p> <p>7 Pennsylvania, and that it has an office in</p> <p>8 Voorhees, New Jersey, but has it --</p> <p>9 A. It had an address.</p> <p>10 Q. Okay. Has that company had any other</p> <p>11 professional relationship or way of doing business</p> <p>12 ever, besides its contract with Associates in</p> <p>13 OB/GYN Care?</p> <p>14 MR. GREANEY: I'm going to object to the</p> <p>15 breadth.</p> <p>16 A. Yeah, that's awfully broad. I don't -- I</p> <p>17 don't -- could you please rephrase the question?</p> <p>18 Q. Other than providing physician services,</p> <p>19 pursuant to a contract with Associates in OB/GYN</p> <p>20 Care, which operated four abortion clinics in the</p> <p>21 State of Maryland --</p> <p>22 A. Okay.</p>	<p>179</p> <p>1 but I don't remember for sure if it was Baltimore.</p> <p>2 Maybe it was Frederick. I'm not sure.</p> <p>3 Your question was where. I'm not sure</p> <p>4 exactly where.</p> <p>5 Q. Do you know if you spoke to the -- on the</p> <p>6 phone to Dr. Dominy before you met her in Maryland?</p> <p>7 A. I don't have an independent recollection</p> <p>8 of that, but it's possible that I -- probably did.</p> <p>9 Q. Okay.</p> <p>10 A. I mean, I can't imagine I would have met</p> <p>11 with her without talking to her on the phone, so I</p> <p>12 must have had some phone conversations with her.</p> <p>13 Q. Do you know for how long Dr. Dominy was</p> <p>14 an independent contractor with AMA?</p> <p>15 A. I don't remember, as I sit here offhand,</p> <p>16 how many years it was.</p> <p>17 Q. Okay. Do you recall a time that</p> <p>18 Dr. Dominy ever told you about a patient named</p> <p>19 Christy O'Connell specifically?</p> <p>20 A. I don't remember ever speaking to</p> <p>21 Dr. Dominy about this patient.</p> <p>22 Q. Other than your one interaction with</p>
<p>178</p> <p>1 Q. -- did your company, AMA, conduct any</p> <p>2 other business?</p> <p>3 A. Well, I will -- I don't -- I told you I</p> <p>4 don't rem -- more recent history, meaning the time</p> <p>5 we started doing business with Associates.</p> <p>6 Going back before that, I mean, way back,</p> <p>7 I mean, back in, you know, all the way, 17 years, I</p> <p>8 don't remember what -- if it did anything or not.</p> <p>9 So I don't want to comment on it, I don't want to</p> <p>10 guess. But by the time that it was engaged in --</p> <p>11 in this arrangement with Associates, that was all</p> <p>12 it did.</p> <p>13 Q. Okay. Do you remember a doctor named</p> <p>14 Iris Dominy?</p> <p>15 A. I believe I met her once.</p> <p>16 Q. Where do you believe you met her?</p> <p>17 A. Well, she was an independent -- she was</p> <p>18 independently contracted with -- by AMA. So she</p> <p>19 was one of AMA's independent contractors. And I</p> <p>20 believe, if I remember correctly, that when we</p> <p>21 first contracted with her, that I met her in one of</p> <p>22 Associates' facilities, I want to say Baltimore,</p>	<p>180</p> <p>1 Dr. Dominy when you first met her in Maryland, do</p> <p>2 you ever recall any in-person interactions with</p> <p>3 Dr. Dominy ever?</p> <p>4 A. I may have had them, I just don't -- I</p> <p>5 can't independently recall them, as I sit here.</p> <p>6 Q. Um-hum.</p> <p>7 A. I do know I talked sometimes to her on</p> <p>8 the phone, but more often, I talked to her husband.</p> <p>9 Q. Why did you talk to her husband?</p> <p>10 A. For some reason, he was -- always spoke</p> <p>11 for her. So any issues -- I don't know exactly</p> <p>12 what their re -- he seemed to be representing her</p> <p>13 in some way in the negotiations with us in some</p> <p>14 capacity, I don't --</p> <p>15 Q. What did you talk to Dr. Dominy's husband</p> <p>16 about?</p> <p>17 A. The independent contractor agreement and</p> <p>18 the terms and all that sort of stuff. He seemed to</p> <p>19 be more involved in money and financial dealings</p> <p>20 with Dr. Dominy than she was. She kind of -- I</p> <p>21 don't know. I did talk with her, though, I mean --</p> <p>22 yes, that's the answer.</p>

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<p style="text-align: right;">181</p> <p>1 Q. So when you -- the conversations you had 2 with her husband, it sounds like, were mainly when 3 she was negotiating terms of this independent 4 contractor agreement with you? 5 A. He -- he called us relatively frequently, 6 Dr. Dom -- I mean, compared to -- compared to her. 7 Q. Once Dr. Dominy had agreed and entered 8 into the independent contractor agreement with -- 9 A. Right. 10 Q. -- AMA, did you hear from her husband 11 again? 12 A. Yeah, I think we did, because he would -- 13 I don't know what it was. He was always calling. 14 Q. What was he calling about? 15 A. I don't remember offhand. Sometimes it 16 was -- it might have been her paycheck or he wanted 17 more money or -- I -- I don't remember offhand. 18 But it seemed like, as far as Dr. Dominy, at least 19 in terms of my interaction, for some reason, he was 20 like there -- Dr. -- her husband was like this 21 intermediary, so we didn't speak to her very much. 22 Q. Okay. So you recall Dr. Dominy's husband</p>	<p style="text-align: right;">183</p> <p>1 know I met her in person at least once. I may have 2 met her a second time. I don't think she went to 3 the holiday parties, or at least not the years I 4 went. I don't remember seeing her at the holiday 5 party. 6 Q. Who planned the holiday party? 7 A. I think Dr. Walker. 8 Q. What do you recall about -- well, do you 9 have any recollection of any conversations you had 10 with Dr. Dominy at any time? 11 A. I can't, as I sit here, it's been years. 12 I can't remember the substance -- the specific 13 substance of it. If I was talking to her, I -- I'm 14 sorry, I just -- I can't remember -- recall 15 offhand. 16 Q. Okay. When did you first become aware 17 that a patient named Christy O'Connell had visited 18 one of the Maryland abortion clinics that AMA 19 staffed? 20 A. I don't remember that, to be honest. 21 Q. Do you think you knew about the existence 22 of a patient named Christy O'Connell before, as you</p>
<p style="text-align: right;">182</p> <p>1 calling, it sounds like more than once, after she 2 became an independent contractor of AMA? 3 A. That's my memory, that he called -- she 4 [sic] called more than once after she became a 5 contractor. 6 Q. And other than issues involving her 7 paycheck, do you recall the substance of any 8 conversation you had with Dr. Dominy's husband? 9 A. I can't say I have an independent 10 recollection of it. 11 Q. Okay. 12 A. No. 13 Q. Do you recall having an independent 14 recollection of speaking to Dr. Dominy, other than 15 the initial meeting that you've already told me 16 about? 17 A. I believe I did speak to her -- 18 Q. Okay. Tell me what -- 19 A. On the phone. 20 Q. Okay. What -- 21 A. I don't -- I don't have an independent 22 recollection of meet -- I may have met her -- I</p>	<p style="text-align: right;">184</p> <p>1 say in your affidavit that we've marked as an 2 exhibit, you were contacted by a reporter from The 3 Baltimore Sun? 4 A. Hal might have called me about a patient. 5 I think there was -- maybe it was you. I think 6 there was an attorney that was requesting a record 7 or something. It might have been you actually, 8 come to think of it, I don't know. I don't 9 remember exactly. But there was no lawsuit that I 10 knew of. 11 Q. Who -- sorry. 12 A. I can't -- I don't want to guess and 13 speculate, so I'm not sure. 14 Q. Who is Hal? 15 A. Dr. Dominy's husband. 16 Q. Did you know Dr. Dominy or her husband, 17 Hal, before she contacted you expressing interest 18 in working for you? 19 A. No. 20 Q. Is -- is -- is Hal's last name Dominy as 21 well? 22 A. I don't think so.</p>

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<p>185</p> <p>1 Q. Okay.</p> <p>2 A. He's got a -- I don't remember. I think</p> <p>3 it's got -- he's got a different name. Actually, I</p> <p>4 assumed that he -- I don't -- assumed that he's her</p> <p>5 husband. I think he identified himself as her</p> <p>6 husband and I don't remember if she confirmed that,</p> <p>7 but he was the one -- he was the one that would</p> <p>8 call us more than her.</p> <p>9 Q. Do you know Hal's lastname?</p> <p>10 A. I can't remember it offhand.</p> <p>11 Q. Is Hal a physician?</p> <p>12 A. I think so, but I don't -- I don't -- I</p> <p>13 don't know his -- he was always calling on behalf</p> <p>14 of Dr. Dominy, whenever he called us. I mean, it</p> <p>15 was -- we had -- let me -- let me qualify this. We</p> <p>16 had very little contact with Dr. Dominy.</p> <p>17 Everything seemed to be okay with Dr. Dominy.</p> <p>18 Q. So do you think that you received a call</p> <p>19 from Dr. Dominy's husband, Hal, saying that a</p> <p>20 lawyer had requested medical records on a patient</p> <p>21 and wanting to know what to do about it?</p> <p>22 A. I don't remember. I and -- and I -- and</p>	<p>187</p> <p>1 just don't remember. The short answer is, I don't</p> <p>2 remember.</p> <p>3 Q. Did -- it sounds like you have a general</p> <p>4 recollection of receiving a call from Dr. Dominy's</p> <p>5 husband that a request for medical records had been</p> <p>6 made and he wanted -- or they wanted your advice.</p> <p>7 A. About a patient. About a patient or</p> <p>8 something. But I don't remember what patient it</p> <p>9 was, so --</p> <p>10 Q. All right. Do you remember any of the</p> <p>11 details about the request for records specifically?</p> <p>12 A. I don't remember what it was. Dr. --</p> <p>13 Hal -- I think it was something about -- you know</p> <p>14 what else, Hal called us because Dr. Dominy --</p> <p>15 there was another -- actually, there was a</p> <p>16 different patient that Dr. -- it could be a</p> <p>17 different patient. There was a patient that</p> <p>18 Dr. Dominy had who there was a complication, and I</p> <p>19 don't think this was Christy O'Connell, and she</p> <p>20 ended up going to the hospital and I -- she -- she,</p> <p>21 the patient may have passed away.</p> <p>22 And I don't -- I don't -- I had this --</p>
<p>186</p> <p>1 I -- I hesitate to comment because I don't want to</p> <p>2 say -- I don't want to say something that's</p> <p>3 incorrect.</p> <p>4 But Hal was calling us -- I have a vague</p> <p>5 memory of Hal calling us about a patient or a</p> <p>6 request for records and it may have been</p> <p>7 Christy O'Connell, it may not have been. I'm not</p> <p>8 sure.</p> <p>9 Q. Okay.</p> <p>10 A. But to answer your first question, I was</p> <p>11 not aware of -- the first time that I became aware</p> <p>12 of the lawsuit, as I said, was when I got this.</p> <p>13 Q. Right. Well, my question wasn't actually</p> <p>14 when you became aware of a lawsuit, but when you</p> <p>15 became aware that a patient named Christy O'Connell</p> <p>16 had been to one of the clinics that your physicians</p> <p>17 staff, and that there was an issue with her care.</p> <p>18 Did you become aware of that before you were aware</p> <p>19 that there was a lawsuit actually filed?</p> <p>20 A. I don't remember.</p> <p>21 Q. Do you --</p> <p>22 A. I may -- there was some -- go ahead. I</p>	<p>188</p> <p>1 and the board -- the state was interested in the</p> <p>2 case and there was -- and Hal was calling us about</p> <p>3 that. I think he wanted us to -- I think he wanted</p> <p>4 to us pay legal fee -- I don't want to say the</p> <p>5 wrong thing and I'm not sure about this. But I</p> <p>6 know that he was contacting us about something</p> <p>7 about a patient, and I don't know if it was</p> <p>8 Christy O'Connell or this other case, so I don't</p> <p>9 want to --</p> <p>10 Q. Okay.</p> <p>11 A. -- guess or speculate.</p> <p>12 MS. MALARKEY: Let's mark this -- well,</p> <p>13 let's take a little while to mark a couple things</p> <p>14 actually.</p> <p>15 THE VIDEOGRAPHER: Off the record?</p> <p>16 MS. MALARKEY: Yeah.</p> <p>17 THE VIDEOGRAPHER: We're going off the</p> <p>18 record, the time is 12:57 p.m.</p> <p>19 (Brigham Exhibits 4 and 5 were marked for</p> <p>20 identification and are attached to the transcript.)</p> <p>21 THE VIDEOGRAPHER: We are back on the</p> <p>22 record, the time is 1:05 p.m.</p>

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<p>189</p> <p>1 BY MS. MALARKEY:</p> <p>2 Q. Okay. So, Doctor, I've handed you what</p> <p>3 we've marked as Exhibit 4 during the break. It's</p> <p>4 labeled, Physician Independent Contractor</p> <p>5 Agreement. Do you have a copy of that?</p> <p>6 A. I see this.</p> <p>7 Q. Okay.</p> <p>8 A. This is -- this document here.</p> <p>9 Q. Is this the independent contractor</p> <p>10 agreement that you were referring to earlier that</p> <p>11 AMA would enter into with its physician</p> <p>12 contractors?</p> <p>13 A. I don't know if this is the precise</p> <p>14 agreement, but this is -- something like this.</p> <p>15 Q. All right. Do you see Dr. Dominy's</p> <p>16 signature on what is -- says 9 at the top? The</p> <p>17 pages are numbered.</p> <p>18 A. It says page 10 and 9, yes.</p> <p>19 Q. Right. In the top right-hand corner, it</p> <p>20 says P.10, but then --</p> <p>21 A. I see her signature, yes.</p> <p>22 Q. Okay. And, obviously, this version was</p>	<p>191</p> <p>1 Q. Why?</p> <p>2 A. -- I do have a reason. Well, because</p> <p>3 there were multiple versions. That was part of the</p> <p>4 problem with Hal in the initial beginning. There</p> <p>5 were like -- I -- yeah, I remember -- you're</p> <p>6 bringing back the memory now that Hal would --</p> <p>7 there was like -- I don't know. It was one of the</p> <p>8 most difficult negotiations because they kept</p> <p>9 revising and revising and revising. And this one</p> <p>10 you've handed me, I didn't sign, she signed. I</p> <p>11 don't know. So I -- no, I can't -- I can't -- I</p> <p>12 can't --</p> <p>13 Q. Where would --</p> <p>14 A. What's the word? I can't certify that</p> <p>15 this is the one that was in effect.</p> <p>16 Q. Okay. Where would the one that was in</p> <p>17 effect be kept?</p> <p>18 A. Well, we would have had one in our files.</p> <p>19 Q. We, who?</p> <p>20 A. American Medical Associates, P.C. And I</p> <p>21 imagine she would have had one, Dr. Dominy would</p> <p>22 have had one that was si -- executed by us too.</p>
<p>190</p> <p>1 provided by Dr. Dominy. It does not have your</p> <p>2 signature on it. But do you see that there's a</p> <p>3 location for you to sign?</p> <p>4 A. I see that.</p> <p>5 Q. Is this of the nature of the type of</p> <p>6 independent contractor agreements that you would</p> <p>7 sign for AMA, when it was entering into a contract</p> <p>8 with a physician?</p> <p>9 A. Well, I mean, I can't comment on all the</p> <p>10 details in this agreement, but I did enter into</p> <p>11 independent contractor agreements with -- I mean, I</p> <p>12 signed, on -- as an officer of American Medical</p> <p>13 Associates, P.C. on behalf of the professional</p> <p>14 corporation with -- on independent contractor</p> <p>15 agreements sometimes, yes.</p> <p>16 Q. Okay. And my question is, specifically,</p> <p>17 independent contractor agreements like this one. I</p> <p>18 mean, do you have any reason to dispute that this</p> <p>19 is not, in fact, the independent contractor</p> <p>20 agreement that American Medical Associates entered</p> <p>21 into with Dr. Dominy?</p> <p>22 A. Yes --</p>	<p>192</p> <p>1 Q. Okay. Do you believe that American</p> <p>2 Medical Associates maintains independent contractor</p> <p>3 agreements now? Are they kept somewhere?</p> <p>4 A. I don't think we have any independent</p> <p>5 contractor agreements now.</p> <p>6 Q. Okay.</p> <p>7 A. I mean, there's no -- it's defunct.</p> <p>8 There are no -- it doesn't have any agreements with</p> <p>9 any physicians now.</p> <p>10 Q. I understand that it doesn't have any</p> <p>11 agreements that are in effect now. What I want to</p> <p>12 know is about American Medical Associates'</p> <p>13 recordkeeping.</p> <p>14 A. Oh, okay.</p> <p>15 Q. Okay. Does American Medical Associates</p> <p>16 maintain records of its prior business affairs?</p> <p>17 A. We attempt to.</p> <p>18 Q. Okay. Do you believe that those records</p> <p>19 contain independent contractor agreements that AMA</p> <p>20 entered into with physicians?</p> <p>21 A. I think so.</p> <p>22 Q. Okay. If you went and looked in those</p>

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1 archives or files and found the independent
 2 contractor agreement for Dr. Dominy, which I will
 3 ask you to do, can you please give it to your
 4 lawyers?
 5 **A. If I can find it, sure.**
 6 Q. Okay. Now, I understand your testimony
 7 that, because of the discussions with Dr. Dominy's
 8 husband, there might have been different --
 9 **A. Multiple revisions.**
 10 Q. -- versions --
 11 **A. Yeah.**
 12 Q. -- of this independent contractor
 13 agreement. But, generally speaking, was the
 14 independent contractor agreement that you would ask
 15 doctors to sign like this one that we have in front
 16 of us?
 17 **A. It was -- I can say it was, generally**
 18 **speaking, similar. This one has these very late**
 19 **pregnancies, I'm surprised at that, but, you know,**
 20 **I can't -- it could have been -- it was**
 21 **generally -- this is what a -- this is an 11-page**
 22 **document. Yeah, it wasn't a -- it was not a**

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1 **hundred page thing. It was something like this.**
 2 Q. Does this document look totally
 3 unfamiliar to you?
 4 **A. No.**
 5 Q. Okay. Now, it has, at the top of page --
 6 the first page, which actually has P.02 in the top
 7 right corner --
 8 **A. Um-hum.**
 9 Q. -- that American Medical Associates'
 10 mailing address is the Alpha Avenue, Voorhees, New
 11 Jersey, address, correct?
 12 **A. That's what it has, right.**
 13 Q. And that was the address that you gave me
 14 earlier which was the main business address for AMA
 15 at the time, true?
 16 **A. At this point in time, this was the**
 17 **mailing address for Vor -- yes.**
 18 Q. Okay. And do you -- if you could flip
 19 ahead to page -- it's got a 4 at the top in the
 20 center and a P.05 in the top right.
 21 **A. Page 5.**
 22 Q. Paragraph 14.3, Covenant Not to Compete.

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1 Do you see that?
 2 **A. Right. I see that.**
 3 Q. Okay. It lists in that paragraph the
 4 current offices of professional corporation in --
 5 and then it gives four Maryland addresses;
 6 Cheverly, Frederick, Silver Spring and Baltimore.
 7 Do you see that?
 8 **A. See. I see -- yeah, I see the four**
 9 **addresses.**
 10 Q. And the professional corporation that
 11 this contract is referring to is American Medical
 12 Associates, true?
 13 **A. I think so.**
 14 Q. Okay. American Medical Associates
 15 conducted business through its independent
 16 contractors at those addresses in Maryland, right?
 17 **A. American Medical -- say that again.**
 18 Q. American Medical Associates conducted
 19 business in Maryland through its independent
 20 contractors at those four addresses in
 21 Paragraph 14.3, right?
 22 **A. American Medical Associates, my**

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1 **understanding is, provided physicians to the**
 2 **facilities located at these four addresses.**
 3 Q. Okay. Can we agree that in
 4 Paragraph 14.3, it states that the current offices
 5 of the professional corporation, which is defined
 6 as AMA --
 7 **A. Wait. I'm trying to find where you are.**
 8 **Oh.**
 9 Q. I'm in the middle of the --
 10 **A. Yeah, yeah, I see. Okay.**
 11 Q. Are in Cheverly, Frederick, Baltimore
 12 and Silver Spring.
 13 **A. That's what this document says.**
 14 Q. Okay. Now, if you look at Exhibit 5,
 15 which is --
 16 **A. Okay. This is Exhibit 4 here?**
 17 MR. GREANEY: Yeah.
 18 Q. So Exhibit 5 is the chart for
 19 Christy O'Connell that was provided to us
 20 earlier --
 21 **A. By who?**
 22 Q. -- in this litigation.

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<p>197</p> <p>1 A. Did we provide this? Where did you get 2 this? Because I -- 3 Q. Okay. Do you have Exhibit 5 in front of 4 you, Doctor? 5 A. I do. 6 Q. Okay. Does this look familiar to you? 7 A. I've never seen this before that I can 8 remember. 9 Q. Okay. 10 A. That's why I was asking where you got 11 this, but-- 12 Q. Okay. 13 A. -- okay. 14 Q. Do you see where at the top -- there's 15 numbers in the bottom right-hand corner? Do you 16 see those, starting with -- 17 A. Yes. Yes. Yes. Yes. 18 Q. -- 1 and going to page 21? 19 A. Right. 20 Q. Okay. 21 A. Right. 22 Q. Can we agree that the heading of all of</p>	<p>199</p> <p>1 form like this with your company's name at the top? 2 A. Not that I remember. 3 Q. Did you ever ask anyone to create medical 4 records on behalf of AMA? 5 A. I have thought that Dr. Panna, that is, 6 part of his being medical director, was supposed to 7 create forms on behalf of -- for Associates. I 8 don't know what he did. Maybe he put AMA on there. 9 Q. So do you have any explanation for why 10 AMA is at the top of all of these medical records? 11 A. My -- I don't. I can't answer that. I 12 don't know. I don't know. 13 Q. Turn to page 4, please. 14 A. Page 4. 15 Q. Do you see at the bottom of page 4, there 16 is a website, www.americanwomensservices.com? 17 A. I see that. 18 Q. Have you ever heard of American Women's 19 Services? 20 A. Yes. 21 Q. Where have you heard of American Women's 22 Services?</p>
<p>198</p> <p>1 the documents in Exhibit 5 which have a heading, 2 state, American Medical Associates at the top? 3 A. That is what is printed at the top of 4 this document. 5 Q. Are these the forms that were used for 6 patient medical recordkeeping at the Maryland 7 clinics? 8 A. I don't know. 9 Q. Have you ever seen -- I understand you've 10 never seen Ms. O'Connell's forms before, but have 11 you seen forms like this before, uncompleted forms 12 that look like this with American Medical 13 Associates at the top? 14 A. Not that I remember. 15 Q. Did American Medical Associates create 16 patient record forms like page 1 of Exhibit 5? 17 A. Not that I remember. 18 Q. Okay. Have you ever seen a patient 19 record that looks like page 1 of Exhibit 5? I 20 don't mean with Ms. Connell's name on it, but just 21 generally speaking, have you, as the president and 22 owner of American Medical Associates, ever seen a</p>	<p>200</p> <p>1 A. That is a trade name. 2 Q. A trade name of what? 3 A. Well, of different entities in different 4 states. 5 Q. Okay. Tell me what entities and in what 6 states. 7 A. Now, or when? 8 Q. At any time. 9 A. Oh, my goodness. Well, actually again, 10 I'm going to focus on Maryland, since I've been 11 advised to talk about Maryland. 12 Q. Sir, my question is, American Women's 13 Services, you said it's your understanding that's a 14 trade name. My question is, what is American 15 Women's Services a trade name for? And if it's 16 multiple different entities, as you, I believe 17 indicated, then I'd like to know those entities. 18 A. Okay. I'll testify about the Maryland 19 entities. I believe that American Women's Services 20 was the trade name that was used by -- my 21 understanding, could be wrong, is that American 22 Women's Services was the trade name in Maryland of</p>

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<p style="text-align: right;">201</p> <p>1 Associates in OB/GYN Care.</p> <p>2 Q. Are you familiar with any other entity</p> <p>3 that has used American Women's Services as its</p> <p>4 trade name?</p> <p>5 A. In Maryland?</p> <p>6 Q. Anywhere, sir.</p> <p>7 A. I believe that trade name has been used</p> <p>8 by other entities in other states.</p> <p>9 Q. Such as what?</p> <p>10 A. Well, again, I've been -- I've been asked</p> <p>11 to confine my testimony to Maryland. So I'm going</p> <p>12 to test -- I'm going to focus on Maryland. I don't</p> <p>13 remember that American Medical Associates ever used</p> <p>14 that as a trade name.</p> <p>15 Q. Okay.</p> <p>16 A. But here it is on this form. I don't</p> <p>17 know how this transpired, but that's what I see.</p> <p>18 Q. Okay. It's my understanding that your</p> <p>19 counsel has advised you not to give any testimony</p> <p>20 about a proceeding that's occurring in New Jersey,</p> <p>21 not anything that has anything to do with</p> <p>22 New Jersey, sir.</p>	<p style="text-align: right;">203</p> <p>1 Q. Okay. You need to say that you're</p> <p>2 refusing to answer the question then, so we can</p> <p>3 have a judge come back and decide whether you need</p> <p>4 to answer the question.</p> <p>5 A. Okay.</p> <p>6 Q. So I'm going to ask it again.</p> <p>7 A. All right. On the advice of counsel, I'm</p> <p>8 going to refuse to answer, outside of the State of</p> <p>9 Maryland.</p> <p>10 Q. Okay. So is it your testimony that you</p> <p>11 are aware of other entities outside the State of</p> <p>12 Maryland, you're just refusing to provide the names</p> <p>13 today?</p> <p>14 A. I am aware, over the past many years, of</p> <p>15 other entities outside of Maryland, unconnected to</p> <p>16 this case, that may have used the trade name of</p> <p>17 American Women's Services --</p> <p>18 Q. And you're not --</p> <p>19 A. -- that is true.</p> <p>20 Q. And you're not providing those?</p> <p>21 A. But I've -- I've been advised not to</p> <p>22 discuss matters outside the State of Maryland, so</p>
<p style="text-align: right;">202</p> <p>1 A. The -- the -- he says, I'm advising you</p> <p>2 not to answer any questions dealing with any matter</p> <p>3 outside of the State of Maryland.</p> <p>4 Q. Okay. So this isn't a matter. This is</p> <p>5 just a fact. Your understanding is that American</p> <p>6 Women's Services is a trade name used by Associates</p> <p>7 in OB/GYN Care in Maryland and by other entities</p> <p>8 outside the State of Maryland. I'm simply asking</p> <p>9 you, what are those other entities?</p> <p>10 A. I'm not -- I'm not sure which entities</p> <p>11 are using the trade name, when and where and all of</p> <p>12 that. And, again, I'm focusing on Maryland, as I</p> <p>13 said, I remember -- my understanding -- you're</p> <p>14 asking my understanding -- my understanding was</p> <p>15 that in Maryland, American -- Associates in OB/GYN</p> <p>16 Care, LLC was utilizing the trade name of American</p> <p>17 Women's Services.</p> <p>18 Q. Are you aware of any other entities</p> <p>19 anywhere, outside of Maryland, who, at any time,</p> <p>20 used American Women's Services as its trade name?</p> <p>21 A. I might be, but I've been advised not to</p> <p>22 answer questions outside the State of Maryland.</p>	<p style="text-align: right;">204</p> <p>1 I'm going to decline not to answer that --</p> <p>2 respectfully decline to answer that question.</p> <p>3 Q. Did American Medical Associates ever use</p> <p>4 the trade name, American Women's Services?</p> <p>5 A. I didn't think so, but here's this</p> <p>6 document that have got the both names on it, so is</p> <p>7 that -- I don't know what that means, but --</p> <p>8 Q. If you turn to page 10 of Exhibit 5 --</p> <p>9 I'm sorry, I apologize. Well, yeah, page 10. You</p> <p>10 see it's a form that says: RH Negative Information</p> <p>11 with American Medical Associates at the top?</p> <p>12 A. Yes.</p> <p>13 Q. Okay. Have you ever seen a form like</p> <p>14 this before? When I say, a form like this, I mean,</p> <p>15 not necessarily one signed by Christy O'Connell,</p> <p>16 but a generic form with your business' title at the</p> <p>17 top that provides information on RH negative to</p> <p>18 patients?</p> <p>19 A. Not that I -- I don't ever remember a</p> <p>20 form like this with American Medical Associates in</p> <p>21 the top that -- not that I remember.</p> <p>22 Q. Have you ever seen a form like this</p>

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<p>1 before?</p> <p>2 A. RH negative forms?</p> <p>3 Q. No. I mean, one with -- that has your</p> <p>4 company's name at the top?</p> <p>5 A. That has American Medical Associates at</p> <p>6 the top?</p> <p>7 Q. Yes.</p> <p>8 A. Not that I remember.</p> <p>9 Q. Do you know who wrote this?</p> <p>10 A. I don't know for a fact.</p> <p>11 Q. Do you have any idea?</p> <p>12 A. Any idea?</p> <p>13 Q. Your company's name is at the top.</p> <p>14 A. Right. Right. Right.</p> <p>15 Q. You've been the sole owner of that</p> <p>16 company since 2000.</p> <p>17 A. Right.</p> <p>18 Q. Do you have any idea who, on behalf of</p> <p>19 your company, would be authoring patient</p> <p>20 information like this in this form?</p> <p>21 A. I would suspect -- I'm not testifying for</p> <p>22 a fact, but you're asking me, do I have any idea,</p>	<p>1 generally a health information release form, but</p> <p>2 one that has your business' title at the top.</p> <p>3 A. I don't remember seeing this before.</p> <p>4 Q. How about page 15, do you see this is a</p> <p>5 form for the patient to sign out -- I'm sorry, to</p> <p>6 sign, authorizing that their insurance pay their</p> <p>7 bill to American Medical Associates, P.C. for</p> <p>8 services furnished by the physician?</p> <p>9 A. Again, I don't remember seeing this off</p> <p>10 the top of my head.</p> <p>11 Q. Does it look familiar to you?</p> <p>12 A. Does it look familiar? I don't remember</p> <p>13 seeing this --</p> <p>14 Q. Did --</p> <p>15 A. -- per se.</p> <p>16 Q. Did you draft it?</p> <p>17 A. Me?</p> <p>18 Q. Yes.</p> <p>19 A. No. No.</p> <p>20 Q. Did you ask anybody to draft it?</p> <p>21 A. I asked Dr. -- well, in his agreement,</p> <p>22 Dr. Panna is the medical director for Associates, I</p>
<p>1 so if I had to guess, I would think that it might</p> <p>2 have been Dr. Panna or Dr. Walker, but I'm not -- I</p> <p>3 don't know that, so I don't want to say that for a</p> <p>4 fact.</p> <p>5 Q. How about page 12, have you ever seen</p> <p>6 this form or a form like it before?</p> <p>7 A. I don't remember seeing this with</p> <p>8 American Medical Associates on it, no, I don't --</p> <p>9 Q. Okay.</p> <p>10 A. -- remember that. I don't have an</p> <p>11 independent recollection of that, let me put it</p> <p>12 that way.</p> <p>13 Q. Do you know who authored this document,</p> <p>14 which looks like it's a letter that gets sent to</p> <p>15 the patient to follow up on her appointment?</p> <p>16 A. I do not know --</p> <p>17 Q. Okay.</p> <p>18 A. -- who authored this. It wasn't me. I</p> <p>19 know that.</p> <p>20 Q. How about page 14, an authorization form</p> <p>21 for release of health information, have you ever</p> <p>22 seen a form like that before? I don't mean just</p>	<p>1 think, was charged with making up forms.</p> <p>2 Q. Um-hum. Did you ask Dr. Panna to make up</p> <p>3 forms, as the medical director for Associates?</p> <p>4 A. I don't personally remember, personally</p> <p>5 saying make up the forms. But I think it was -- I</p> <p>6 think it was in his independent contractor</p> <p>7 agreement as medical director for American Medical</p> <p>8 Services --</p> <p>9 Q. Um-hum.</p> <p>10 A. -- I think --</p> <p>11 MR. GREANEY: Medical director for who?</p> <p>12 A. I'm sorry. Excuse me. Medical director</p> <p>13 of Associates in OB/GYN Care as -- in his</p> <p>14 independent contractor for American Medical</p> <p>15 Associates as medical director of Associates in</p> <p>16 OB/GYN Care, I think he was responsible for setting</p> <p>17 policies --</p> <p>18 Q. Um-hum.</p> <p>19 A. -- and forms and stuff like that.</p> <p>20 Q. So you hired Dr. Panna to be the medical</p> <p>21 director of Associates in OB/GYN Care, correct?</p> <p>22 A. Well, American Medical Associates, P.C.</p>

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<p style="text-align: right;">209</p> <p>1 contracted with Dr. Panna to provide medical 2 directorship services, I guess you will, for 3 Associates in -- 4 Q. Okay. 5 A. -- OB/GYN Care, if you want to be formal 6 about it. 7 Q. So Dr. Panna was not an employee of 8 Associates in OB/GYN Care, he was an independent 9 contractor with American Medical Associates? 10 A. Dr. Panna was an independent contractor 11 of American Medical Associates, not -- was he an 12 employee of Associates? He -- he -- I don't think 13 he was -- well, I'm not sure the legal answer to 14 that question. But he was an independent 15 contractor with American Medical Associates, P.C., 16 yes, and his -- one of his -- unlike Dr. Dominy, 17 who was not the medical director, Dr. Panna was the 18 medical director. 19 Q. Um-hum. What did it mean to be the 20 medical director? 21 A. Well, my understanding is that his 22 responsibilities were to establish policies. He</p>	<p style="text-align: right;">211</p> <p>1 Q. When? 2 A. I don't remember what year. 3 Q. Did you go to her funeral? 4 A. I did. 5 Q. Where was it? 6 A. Where? 7 Q. Um-hum. 8 A. It was in Maryland. 9 Q. Do you know where in Maryland? 10 A. I couldn't tell you offhand. 11 Q. How old was Dr. Walker? 12 A. Young. 13 Q. Do you know what she passed away from? 14 A. I don't have firsthand knowledge. 15 Q. Okay. So this is a woman you had a 16 business relationship with for several years, at 17 least, and attended her funeral, and you don't 18 remember her first name? 19 A. She had a nickname, which was, I think, 20 Kimmy. 21 Q. Okay. 22 A. But what her official legal name is, I</p>
<p style="text-align: right;">210</p> <p>1 and Dr. Walker -- and exactly what their 2 interaction was, I -- I'm not sure, would establish 3 the medical policies, procedures, forms, training, 4 you know, just quality of care issues to ensure 5 good quality of care in Associates' facilities. 6 Q. Did you ever see Dr. Walker at any of the 7 Maryland clinics? 8 A. Yes. 9 Q. When? 10 A. What year? I don't remember what year it 11 was. 12 Q. Which clinics? 13 A. I believe I saw her at the Silver Spring 14 facility? I don't remember which one it was. I 15 don't want to -- I don't want to speak and say the 16 wrong thing. I'm not sure. 17 Q. Did Dr. Walker continue to be affiliated 18 with Associates in OB/GYN Care up until the time 19 that it became defunct, as you understand it? 20 A. To the best of my memory, she did. 21 Q. Do you know what Dr. Walker's doing now? 22 A. I think she passed away.</p>	<p style="text-align: right;">212</p> <p>1 don't know. I don't want to -- I'm under oath, I 2 don't want -- I don't want -- I want to be careful 3 and not say the wrong thing. 4 Q. Do you know where she lived, when she was 5 living? 6 A. I've never been to her house. I don't 7 know. 8 Q. Did she live in Maryland? 9 A. I think so, yes. 10 Q. Do you know what city? 11 A. No. 12 Q. Do you know her husband, if she was 13 married? 14 A. No. 15 Q. Do you know where she trained? 16 A. No -- I take that back. I know she did 17 in Philly, I think she did at Drexel maybe. I'm 18 not sure. 19 Q. All right. If you look at the next page 20 of Exhibit 5, page 16, is this document, which is 21 entitled, American Medical Associates Medical 22 Abortion Contents --</p>

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1 **A. I'm not sure I'm looking at the same form**
 2 **that you are.**
 3 Q. Yep. Page 16 at the top.
 4 **A. Oh, 16. I thought you said page 5.**
 5 Q. Oh, I'm sorry. Page 16. I'm sorry if I
 6 misspoke it. It says, American Medical Associates
 7 Medical Abortion Consent. Have you seen -- this is
 8 Christy O'Connell's, but have you seen --
 9 **A. This is very hard to read. It's very--**
 10 Q. Well, I can read it pretty well.
 11 **A. Okay. All right. Okay. Good.**
 12 Q. I would just like to know if this is a
 13 form that you have seen before. And it's a
 14 three-page form that has the patient initial in the
 15 bottom right-hand corner of pages 1 and 2 and
 16 signed on page 3.
 17 **A. This particular form with American**
 18 **Medical Associates on it, this page, I don't**
 19 **remember--**
 20 Q. Um-hum.
 21 **A. -- seeing this.**
 22 Q. Did you ask anyone to author a medical

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1 consent for abortion for AMA?
 2 **A. No. I asked -- or AMA, I believe, asked**
 3 **Dr. Panna to author a consent for --**
 4 THE VIDEOGRAPHER: I can't hear you.
 5 **A. -- Associates, but I don't know, I guess**
 6 **they put AMA on it.**
 7 MR. GREANEY: Doctor, can you move your
 8 microphone up closer to your mouth.
 9 THE WITNESS: Oh, sorry.
 10 Q. So you, sitting here today, you don't
 11 know if Dr. Panna actually did draft any medical
 12 consents or medical record forms on behalf of
 13 Associates in OB/GYN Care in his capacity as the
 14 medical director?
 15 **A. I'm sorry, would you say -- repeat that**
 16 **question?**
 17 Q. I've asked you about a number of these
 18 forms and whether you recognize them and have seen
 19 them before. I think your testimony for all of it
 20 has been, you don't recognize it, you've not seen
 21 these before and you didn't draft them, true?
 22 **A. This forms with the American Medical**

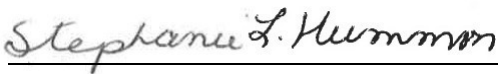
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1 **Associates, I didn't draft them.**
 2 Q. Okay. Did --
 3 **A. Go ahead.**
 4 Q. Did you draft any of the forms or papers
 5 or consents that are located in Exhibit 5?
 6 **A. No.**
 7 Q. Have you seen any of these forms before?
 8 And when I say, these forms, I don't necessarily
 9 mean Christy O'Connell's, but any of the forms that
 10 have American Medical Associates' name at the top.
 11 **A. Not that I remember.**
 12 Q. Okay.
 13 **A. I mean -- not that I remember.**
 14 Q. If I'm following your testimony, the only
 15 way that you can conceive that these forms came
 16 into existence is if Dr. Panna had drafted them?
 17 **A. You asked me -- I said, I didn't know**
 18 **offhand and you asked me --**
 19 Q. Right.
 20 **A. -- is there any way that I could think**
 21 **of. So, you know, rather than just say, I don't**
 22 **know and leaving it at that, I was trying to be**

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1 **cooperative, and my best thought would be that**
 2 **Dr. Panna did this. But I don't -- I don't know**
 3 **that. So I don't want to -- I want to be clear.**
 4 **The short answer is, I don't know.**
 5 Q. Okay. Other than Dr. Panna drafting
 6 these, do you have any other idea -- and I
 7 understand you don't know for a fact -- but is
 8 there any other way that these documents could have
 9 come into an -- come into existence?
 10 **A. You're asking me to speculate?**
 11 Q. Sir, you are the president and owner of
 12 American Medical Associates. Almost every page on
 13 this -- on this exhibit, which is a 21-page
 14 exhibit, almost every page of it has your company's
 15 heading at the top. I'm just wondering, as the
 16 owner of that company, whether you have any idea
 17 who drafted these documents or how they got
 18 drafted?
 19 **A. I don't know for a fact how -- who**
 20 **drafted these documents or -- and how they got**
 21 **drafted, and these are now five years old. So I**
 22 **don't want to -- I don't know is the short answer.**

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<p style="text-align: right;">217</p> <p>1 Q. In 2012, was RU-486 approved for abortion 2 in the United States?</p> <p>3 A. I believe, from my memory, but I am -- I 4 think it was. I think -- I don't -- I think it -- 5 I don't -- I -- yes, I think the answer is -- I 6 can't remember exactly which year it was approved, 7 but I think by 2012, it was.</p> <p>8 Q. Okay. Was it available in the 9 United States for abortion in 2012?</p> <p>10 A. I think so. There was a -- it went 11 through a convoluted history of approval and it 12 was -- became very political.</p> <p>13 Q. Okay.</p> <p>14 A. But I think the answer to your question 15 is that, by 2012, it was approved.</p> <p>16 MS. MALARKEY: Can we go off the record 17 for a second, talk about some logistics.</p> <p>18 THE VIDEOGRAPHER: We're going off the 19 record, the time is 1:36 p.m.</p> <p>20 (Recess taken.)</p> <p>21 THE VIDEOGRAPHER: We are back on the 22 record, the time is 1:41 p.m.</p>	<p style="text-align: right;">219</p> <p>1 CERTIFICATE OF SHORTHAND REPORTER - NOTARY PUBLIC 2 I, STEPHANIE HUMMON, Registered 3 Professional Reporter and Notary Public, the 4 officer before whom the foregoing deposition was 5 taken, do hereby certify that the foregoing 6 transcript is a true and correct record of the 7 proceedings; that said testimony was taken by me 8 stenographically and thereafter reduced to 9 typewriting under my supervision; that reading and 10 signing was not requested; and that I am neither 11 counsel for or related to, nor employed by any of 12 the parties to this case and have no interest, 13 financial or otherwise, in its outcome.</p> <p>14 IN WITNESS WHEREOF, I have hereunto set 15 my hand and affixed my notarial seal this 10th day 16 of November, 2017. 17 My commission expires July 6, 2019.</p> <p>18 19  20 21 NOTARY PUBLIC IN AND FOR 22 THE STATE OF MARYLAND</p>
<p style="text-align: right;">218</p> <p>1 This concludes the deposition for today. 2 We're going off the record, the time is 1:41 p.m. 3 Thank you. 4 (Off the record at 1:41 p.m.) 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22</p>	

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