

1 A. Let's see. Theodore Krupin, William Frayer,
2 Stephen Orlin, Alexander J. Brucker, James Katowitz,
3 David Schaffer.

4 Q. Okay.

5 A. Fran Quinn, Ralph Eagle, possibly some other
6 people.

7 Q. I just want to know everybody you can think of
8 right now. And at MCP, the fellowship, who were you
9 involved with in training at MCP in your fellowship?

10 A. At MCP that was supervised by the department
11 chairman of ophthalmology, at that time, Herbert Nevyas
12 M.D.

13 Q. Herbert Nevyas is that your father?

14 A. Yes.

15 Q. What anterior segment of?

16 A. Anterior segment surgery is surgery of the front
17 part of the eye. The interior segment, that includes
18 corneal surgery, cataract surgery, conjunctival
19 surgery, everything relating to the front of the eye.

20 Q. Would it include lasik?

21 A. It would include lasik which hadn't been invented
22 yet.

23 Q. Now, it would?

24 A. Now, it would, but not back then.

1 Q. Was clear lens extraction around then?

2 A. Yes.

3 Q. Did it include clear lens extraction?

4 A. Yes.

5 Q. When did lasik come to be?

6 A. 1992.

7 Q. Okay.

8 A. Actually, let me say either '91 or '92, I'm not
9 certain.

10 Q. Did you have training during your residency in
11 performing clear lens extraction?

12 A. During my residency, I had training in cataract
13 surgery.

14 Q. Okay.

15 A. Which is the same operation as clear lens
16 extraction.

17 Q. Okay.

18 A. The only difference is the clarity or cloudiness
19 of the lens being removed.

20 Q. Okay. Can you estimate for me -- during the
21 course of your residency, did you actually perform
22 clear lens extractions?

23 MS. NEWMAN: Cataract surgery.

24 MR. KAFRISSEN: Oh, I'm sorry.

1 THE WITNESS: I performed cataract
2 surgery.

3 MS. NEWMAN: Are you sure?

4 THE WITNESS: Yes.

5 BY MR. KAFRISSEN:

6 Q. Can you estimate for me between let's say when
7 you started -- when did you first perform cataract
8 surgery involving clear lens extraction?

9 A. You're not asking about cataract surgery?

10 Q. Well, I'm asking about --

11 MS. NEWMAN: See the confusion is,
12 she said it's the same surgery, the only
13 difference is the clarity or cloudiness of
14 the lens. So I think that her confusion
15 is, do you want to know the first time
16 she's performed the procedure or cataract
17 or the first time she did clear lens.

18 MR. KAFRISSEN: Okay.

19 MS. NEWMAN: It's the same procedure,
20 different color lens.

21 BY MR. KAFRISSEN:

22 Q. Right. The clear lens is what is used in the
23 refractive procedure. Let me ask you this, technically
24 are the procedures the same to perform whether it's

1 cataract or it's refractive procedure?

2 A. Whether you're removing a lens because it's
3 cloudy or because it's the wrong power for that eye?

4 Q. Yes.

5 A. The technique is the same.

6 Q. So that in terms of the technique then when did
7 you first use that technique of lens extraction,
8 describe for me your training in using the technique of
9 lens extraction?

10 A. My training consisted of three years spent in
11 residency with many, many hours in the operating room.
12 During the first year, I assisted in cataract surgery.
13 And at the end of that, I performed a single case,
14 which first year residents weren't generally offered
15 that opportunity unless they showed special promise in
16 their surgical technique, and the bulk of the cataract
17 surgery is performed in the third year. Having spent
18 the first two learning every aspect and doing parts of
19 the operation, but not necessarily the whole thing from
20 start to finish.

21 Q. Okay.

22 A. And then in the third year, it's the whole
23 operation from start to finish and also assisting other
24 surgeons at their cataract surgery so that typically