

1 the third year resident spends a day with an
2 experienced surgeon. The resident assists the surgeon
3 on his or her cases and then the surgeon assists the
4 resident on his or her cases and coaches. So the two
5 of them spend the day together. Some cases are the
6 residents and some cases are the experienced surgeon's
7 cases.

8 Q. As of 1997 is there any way for you to estimate
9 how many lens extractions you had performed?

10 A. How much cataract surgery?

11 Q. Well, yeah, how much cataract surgery you had
12 performed?

13 A. Do you want me to guess?

14 MS. NEWMAN: No.

15 BY MR. KAFRISSEN:

16 Q. No.

17 A. Okay.

18 Q. What I'm looking for if you can give a reasonable
19 estimate, like, yeah, I do about 40 of those a year,
20 then, that's fine. But if it's just going to be a wild
21 guess, then don't bother giving it?

22 A. Over a thousand, but I don't have an exact
23 number.

24 Q. Okay.

1 A. Maybe a lot higher.

MS. NEWMAN: Minimum of a thousand?

THE WITNESS: Minimum of a thousand.

3 BY MR. KAFRISSEN:

4 Q. Now, can you tell me what's the difference
5 between active staff, courtesy staff, and associate
6 staff, in the hospital appointments at the different
7 hospitals?

8 A. How many meetings you're required to attend.

9 Q. Okay.

10 A. If you're on courtesy staff you really don't have
11 to attend staff meetings.

12 Q. Okay. But do you have operating privileges at
13 the hospital then?

14 MS. NEWMAN: You want to tell her
15 which hospital, maybe that would help?

16 BY MR. KAFRISSEN:

17 Q. Graduate Hospital is listed as courtesy staff?

18 A. At this point I'm courtesy. I don't remember
19 when I stopped operating there and then I stayed on
20 active staff for a few years and finally switched to
21 courtesy.

22 Q. Other than how many meetings you have to attend,
23 do you have the same privileges?

1 A. Admitting privileges are different and I don't
2 recall the details. I haven't admitted anybody there
3 in a long time.

4 Q. Are you on the active staff at the University of
5 Pennsylvania?

6 A. I don't think so, no, not now.

7 Q. Now, here you have associate staff, Presbyterian?

8 A. Oh, I am on the staff at Presbyterian, yes.

9 Q. What does associate staff mean?

10 A. I don't remember. There are a lot of categories
11 of staff.

12 Q. Can you admit patients at Presbyterian?

13 A. I don't recall.

14 Q. Can you perform surgery at Presbyterian?

15 A. I think so.

16 Q. Let me ask you something, do you perform -- as of
17 1997, were you performing surgery anywhere other than
18 at the Delaware Valley Laser Surgery Institute?

19 A. I believe I was still performing surgery at the
20 Medical College of Pennsylvania, but I would have to
21 check and see how many cases I was on.

22 Q. Okay.

23 A. I was not operating at Penn at that point.

24 Q. You have it here as an attending at Graduate

1 Health System, City Avenue?

2 A. I wasn't operating there.

3 Q. Okay. You had privileges there to operate
4 though?

5 A. I think so.

6 Q. Are you Board Certified?

7 A. Yes.

8 Q. What's your certification?

9 A. American Board of Ophthalmology.

10 Q. Do you consider yourself to be an expert in any
11 other field of medicine outside of ophthalmology?

12 A. No.

13 Q. Now, the presentations that you've given, I did
14 have one quick question on that. You have Nevyas Eye
15 Associates Clinical Lecture Series, what's that?

16 A. Nevyas Eye Associates offers lectures for doctors
17 in the community for educational purposes.

18 Q. Was that in existence in 1997?

19 A. Yes.

20 Q. Have you lectured regarding the lasik procedure?

21 A. Yes.

22 Q. Have you lecture regarding lens replacement
23 surgery.

24 A. Yes.