

1 possibility of doing a surgery. The surgery that you
2 had mentioned to Cheryl, you had refracted her that
3 day; is that right?

4 A. No.

Q. You had not refracted her -- Oh, you took the
6 reading off of the glasses?

7 A. It says eye glass.

8 Q. Okay, I'm sorry. Tell me just so I'm clear, so
9 I'm on the same page as you. The negative 15 and a
10 half, negative 15 and a quarter for the right eye, what
11 does that mean?

12 A. That is measured in diopters. It's the amount of
13 nearsightedness.

14 Q. Okay. What's being measured?

15 A. The inverse of the fraction of the meter from the
16 patient's eye to the focal point.

17 Q. Is there any relation between the thickness of
18 the eye and the diopter measurement?

19 A. The thickness of the eye --

20 . Or of the cornea?

21 A. The thickness of the cornea and the diopter
22 measurement?

23 Q. Right.

24 A. No, no relation.

1 Q. If you were to remove one diopter --

2 A. You can't remove one diopter.

3 Q. Well, you wouldn't remove a diopter you would
4 remove tissue from the cornea?

5 A. I would remove tissue from the cornea.

6 Q. Let me ask you this. As you remove tissue from
7 the cornea, the diopters reading -- the diopter is a
8 increment --

9 A. The focal length of the eye changes based on the
10 curvature of the cornea.

11 Q. Okay.

12 A. And some other things.

13 Q. Okay. The negative 1.75, what does that refer
14 to?

15 A. That refers to astigmatism.

16 Q. Can you define for me what is meant by the phrase
17 an irregular astigmatism?

18 A. Astigmatism, not correctable with spectacle
19 lenses.

20 Q. Did Cheryl Fiorelli at any time prior to 3/20/97
21 have what you would consider to be an irregular
22 astigmatism?

23 A. Can I look?

24 Q. Yes, you can refer to your records for any of my

1 questions. If you don't remember it off the top of
2 your head?

3 A. It's not that I don't remember; it's that I would
4 have to rephrase the question.

5 Q. Tell me that.

6 MS. NEWMAN: Tell him that.

7 THE WITNESS: I didn't define
8 astigmatism.

9 BY MR. KAFRISSEN:

10 Q. Define it.

11 A. I think that's where to begin.

12 Q. Okay.

13 A. Astigmatism is a sparsity. It's a difference in
14 the focal point in different meridians of the cornea.

15 Q. Okay.

16 A. Meridians, do you remember what meridians are?

17 Q. No.

18 MS. NEWMAN: Off the record.

19 (A discussion was held off the
20 record.)

21 THE WITNESS: The meridians are the
22 lines connecting the North Pole to the
23 South Pole.

24 BY MR. KAFRISSEN:

1 Q. Okay.

2 A. And the time zones are different in different
3 meridians.

4 Q. Yes.

5 A. And we describe the cornea as having different
6 meridians and different angles.

7 Q. Okay.

8 A. And if the focal point in one meridian is
9 different from the focal point in a different meridian,
10 we call that astigmatism.

11 Q. Are there degrees of astigmatism?

12 A. There are different amounts of astigmatism.

13 Q. Okay.

14 A. And there are different varieties of astigmatism.

15 Q. Tell me what are the different varieties of
16 astigmatism?

17 A. There is symmetrical astigmatism, asymmetrical
18 astigmatism, and irregular astigmatism.

19 Q. Okay. Can you classify for us prior to the first
20 surgery what type of astigmatism did Cheryl Fiorelli
21 have in her right eye?

22 A. Cheryl Fiorelli had symmetrical astigmatism.

23 Q. Now, can you classify for me the type of
24 astigmatism that Cheryl Fiorelli had in her left eye?