

1 Q. In 1991, I just want to make sure I'm not missing
2 it somewhere. Is there anything in the records from
3 1991 where anyone wrote down that she has problems with
4 glare or halos, and by anyone, I'm talking now about a
5 physician or technician from Nevyas Eye Associates who
6 was taking care of her and who she was there to see?

7 A. No, and that's not what she was there for.

8 Q. Was she examined at any time prior to the date
9 that you saw her in 1997 by any physician at Nevyas Eye
10 Associates?

11 A. Yes.

12 Q. You would write down any significant findings you
13 made during the course of an examination whether she
14 was there for them or not; isn't that correct?

15 MS. NEWMAN: Are you asking about her
16 or are you asking about the physician that
17 saw her in 1991 and 1995 because you kind
18 of switch gears there in the middle?

MR. KAFRISSEN: Okay.

19 BY MR. KAFRISSEN:

20 Q. Would a physician in your office be expected --
21 would you expect a physician in your office to write
22 down any relevant findings that they make during the
23 course of an examination whether they're there for that
24

1 or halos prior to your seeing the patient from Nevyas
2 Eye Associates?

3 A. Yes.

4 Q. Where?

5 A. The patient's own questionnaire.

6 Q. I asked you did anyone from Nevyas Eye
7 Associates, a doctor, a technician, did anyone document
8 problems with glare and halos?

9 A. Our way of documenting complaints is by asking
10 the patients whether they have the following symptoms,
11 we did that in the form of a written questionnaire.

12 She indicated that yes, she had certain of those
13 complaints including that one so that is, for us,
14 documented.

15 Q. Okay. What part of the questionnaire indicates
16 to you that she had halos before '97?

17 MS. NEWMAN: She said that it
18 references glare.

19 THE WITNESS: Glare.

20 MR. KAFRISSEN: Right. But what she
21 said, maybe it's my misinterpretation, that
22 we've been mixing together glare and halos
23 because I've been saying what in these
24 records documents glare and halos, and the

1 particular problem or not?

2 MS. NEWMAN: I'm just going to object
3 as to what a physician in the office would
4 do.

5 MR. KAFRISSEN: Okay. You can answer
6 that.

7 THE WITNESS: What do you mean by
8 findings?

9 BY MR. KAFRISSEN:

10 Q. Well --

11 A. Physical findings?

12 Q. Physical findings, vision findings, my
13 understanding --

14 A. Physical findings are what the physician
15 determines on examination.

16 Q. Okay.

17 A. The doctor doesn't see the glare or halos. The
18 doctor saw that the pupils were normal that there were
19 --

20 MS. NEWMAN: Just listen to the
21 question, please.

22 THE WITNESS: Okay.

23 BY MR. KAFRISSEN:

24 Q. Did anyone document any problems with the glare

1 questionnaire that you're referring to is a
2 questionnaire that you interpret as meaning
3 she had glare effect.

4 MS. NEWMAN: She interpreted her
5 responses as interpreting glare problems.

6 MR. KAFRISSEN: Okay.

7 MS. NEWMAN: That's the way I heard
8 the testimony.

9 BY MR. KAFRISSEN:

10 Q. Are there any responses there that you're
11 interpreting as halo problems?

12 A. No. That didn't come up until I talked to her.

13 Q. Are there any records that you see written by
14 someone at Nevyas Eye Associates that documents a glare
15 problem before you saw her in 1997?

16 A. No.

17 Q. Are there any documents that you see from Nevyas
18 Eye Associates that documents a halo problem prior to
19 your seeing her in 1997?

20 A. No.

21 Q. Now, when you spoke to the plaintiff and had this
22 discussion that you're relating to us, on March 3rd of
23 '97, was it of any significance to you that she would
24 tell you or that you have related to us that she had