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 19 and Ira B. Wallace, M.D.

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1 THE COURT REPORTER: Will there be the  
 2 usual stipulations?  
 3 MS. NEWMAN: Reading and signing.  
 4 (It is hereby stipulated and agreed by  
 5 and among counsel that sealing and filing are  
 6 waived; all objections, except as to the form of the  
 7 question, are reserved until the time of trial.)  
 8 ---  
 9 ANITA NEVYAS-WALLACE, M.D., having been  
 10 duly sworn, was examined and testified as  
 11 follows . . .  
 12 DR. FRIEDMAN: Okay. The usual  
 13 stipulations and reading and signing you said, and  
 14 will that be within 30 days of when the deposition  
 15 transcript has been produced?  
 16 MS. NEWMAN: Whatever the rules say,  
 17 sure.  
 18 DR. FRIEDMAN: Can we agree to 30  
 19 days?  
 20 MS. NEWMAN: We agree to try our best.  
 21 DR. FRIEDMAN: Fine.  
 22 BY DR. FRIEDMAN:  
 23 Q. Doctor, I'm Steven Friedman, sitting next to  
 24 me is Michael Friedman and we represent Dominic

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12 INSTRUCTIONS NOT TO ANSWER

13 BY MS. NEWMAN:

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23 ---

1 Morgan who is a plaintiff in a lawsuit in which you  
 2 are one of the defendants.  
 3 I'm going to be asking you a number of  
 4 questions today. If you don't understand a  
 5 question, I would like you not to guess at any  
 6 answers. I would like you to tell me you don't  
 7 understand and we'll see what we can figure out.  
 8 I'm sure your counsel also doesn't want you to do  
 9 any guessing.  
 10 MS. SANDS: Mr. Friedman, you'll have  
 11 to keep your voice up because I can't hear.  
 12 Whatever is blowing back there, it's preventing me  
 13 from hearing you.  
 14 Q. Can you hear me adequately, Doctor?  
 15 A. Yes.  
 16 Q. I could barely hear your yes . . .  
 17 MS. NEWMAN: I'm sorry. For the  
 18 record, there are very large fans that are blowing  
 19 in back of us. It's a difficult room for a  
 20 deposition. I think everybody is going to have to  
 21 try to do their best. But unless there is a way to  
 22 turn these fans off, it is going to be very  
 23 difficult for everybody.  
 24 DR. FRIEDMAN: Well, Susie, you'll be