

[1] Herbert J. Nevyas, M.D.
 [2] center.
 [3] Q: What do you mean "much better"?
 [4] A: Better care of my patients.
 [5] Q: Now, Doctor, have you ever performed LASIK at
 [6] any hospital?
 [7] A: No.
 [8] Q: Were you ever given privileges by any
 [9] hospital, such privileges saying that you would be
 [10] allowed to do LASIK surgery at a hospital?
 [11] MR. LAPAT: Objection. Vague.
 [12] MS. NEWMAN: Continuing objection to
 [13] this whole line.
 [14] A: I don't think so. I don't think I ever
 [15] applied specifically to do LASIK at a hospital since
 [16] none of the hospitals that we mentioned had lasers
 [17] at the time and then I began using my own.
 [18] Q: Do you know if Dr. Nevyas-Wallace has
 [19] performed LASIK at any hospital?
 [20] MS. NEWMAN: Objection to relevancy.
 [21] MR. LAPAT: Same objection.
 [22] A: I don't know. Not as far as I know, let's
 [23] put it that way. Not as far as I know.
 [24] Q: Do you know if Dr. Nevyas-Wallace has
 [25] privileges to do LASIK or has ever had privileges to

[1] Herbert J. Nevyas, M.D.
 [2] do LASIK at any hospital?
 [3] A: At a hospital —
 [4] MR. LAPAT: Objection.
 [5] MS. NEWMAN: Same objection.
 [6] A: — I do not know.
 [7] Q: In addition to the four hospitals listed plus
 [8] Wills Eye, have there been any other hospitals that
 [9] you have been on a medical staff of?
 [10] MS. KRAMER: And this is at any time?
 [11] A: Ever?
 [12] MS. KRAMER: Is that what you are
 [13] looking at, at any time?
 [14] Go ahead. You can answer.
 [15] A: There was a hospital in West Philadelphia
 [16] called The Women's Hospital where I was on the staff
 [17] for several years, but they closed. I have had
 [18] staff privileges at Hahnemann Hospital in the past a
 [19] long time ago. Let me think. And that's about it.
 [20] University of Pennsylvania Hospital, Hospital of the
 [21] University of Pennsylvania I have had privileges in
 [22] the past when I was on the teaching staff. I have
 [23] my CV there. That would I think cover it.
 [24] Q: I'm just looking at it. I wanted to ask you,
 [25] when you said Scheie Eye Institute, were you

[1] Herbert J. Nevyas, M.D.
 [2] including Presbyterian Hospital?
 [3] A: That is part of Presbyterian Hospital, yes.
 [4] Q: Doctor, with regard to your CV, I'm going to
 [5] pass you what was Bates marked No. 1168 through 1174
 [6] and ask you to identify that.
 [7] A: I'm sorry. What did you say, Bates marked?
 [8] Q: It is the number in the lower right-hand
 [9] corner.
 [10] A: Oh. 1168 to 74, yes.
 [11] Q: Can you identify that?
 [12] A: It is my curriculum vitae, at least as of the
 [13] last updating, yes.
 [14] Q: When was that last updating?
 [15] A: I don't know. It doesn't have a date on it.
 [16] Q: Is there anything you would add to that
 [17] curriculum vitae to bring it up to date?
 [18] A: Well, my secretary, whoever it was at the
 [19] time, has been bringing things up to date. There
 [20] were a number of papers that have not gotten on it.
 [21] Actually it was her idea to start putting papers on
 [22] it lately. I have given papers many years. Every
 [23] year I have given papers at certain society
 [24] meetings. Aside from that, I think it is pretty
 [25] much up to date as far as I can see. I might have

[1] Herbert J. Nevyas, M.D.
 [2] to read every bit of it to be sure. There were some
 [3] changes.
 [4] Q: Who prepared the curriculum vitae?
 [5] A: No one person. It has been added to over the
 [6] years. Whoever was my secretary has been adding to
 [7] it.
 [8] Q: You said there were some changes. What
 [9] changes?
 [10] A: I would have to look to tell you. This
 [11] doesn't look like my — I think something has gotten
 [12] mixed up here. There is some mistake. I guess I
 [13] did have an appointment at Temple at one point
 [14] through Wills Eye Hospital. It looks okay. I'm not
 [15] sure what my current status is at Wills and at
 [16] Presbyterian because I have not been working there.
 [17] So I do not think I'm on active staff any more at
 [18] either of them. So that should be corrected.
 [19] The rest looks okay.
 [20] MR. FRIEDMAN: I think we had gotten up
 [21] to K on the list, counselor. Did you bring the
 [22] original file material relating to — if there is
 [23] any file material?
 [24] MS. KRAMER: There isn't any. There is
 [25] no material in response to K. There were no