

[1] Herbert J. Nevyas, M.D.
[2] took other courses on that subject as well as LASIK.
[3] **Q:** Do you maintain certificates from these
[4] different places to document your training?
[5] **A:** No. There weren't — the only place where I
[6] might have certificates were the official
[7] company-sponsored courses by visits to Summit.
[8] There were no certificates for attending the
[9] meetings except CE credits, but not specifically
[10] stating what I attended.
[11] **Q:** Except for what?
[12] **A:** Except for continuing education credits. And
[13] there were certainly no certificates for the very
[14] valuable but not formal courses where I spent time
[15] with leaders in the field.
[16] **Q:** Did you say formal courses or informal
[17] courses?
[18] **A:** They were not formal courses.
[19] **Q:** Did you obtain certificates of continuing
[20] medical education?
[21] **A:** At the time I think so. I'm not sure. I
[22] usually have far more than the number of credits
[23] needed for my recertification so that I may not have
[24] bothered to submit them, but at the time I attend
[25] the courses, I have them send me certificates. I

[1] Herbert J. Nevyas, M.D.
[2] often don't retain them.
[3] I have also attended meetings of the
[4] Sing Society for Excellence in Ophthalmology which
[5] had LASIK courses and LASIK-related papers, and I
[6] have also attended the ISRS, of which I'm a member,
[7] the International Society for Refractive Surgery,
[8] and again I have taken specifically LASIK courses
[9] and attended lectures there. I attend the Sing
[10] meeting at least every year, and the ISRS has
[11] meetings twice a year and I usually attend at least
[12] one and have often attended both.
[13] **Q:** In all of the meetings and courses that
[14] you've attended, has there been any mention of any
[15] patient who had LASIK who had a similar condition to
[16] Mr. Morgan?
[17] **MS. KRAMER:** I'm going to object to the
[18] form and ask if you can define "similar condition."
[19] **MS. NEWMAN:** Object to form.
[20] **MR. LAPAT:** Objection.
[21] **Q:** A similar condition would be a history of
[22] retinopathy of prematurity with a large positive
[23] angled kappa.
[24] **A:** Not to my recollection.
[25] **Q:** How about in any of these meetings or courses

[1] Herbert J. Nevyas, M.D.
[2] — I just want to be certain I understand. Some of
[3] those you got certificates that are on the wall
[4] possibly?
[5] **A:** I believe. I would have to check because we
[6] have a great many certificates on the wall and I'm
[7] not sure which ones got framed.
[8] **MR. FRIEDMAN:** Counselor, would you
[9] agree with me that if the certificates are framed
[10] and on the wall they are covered by L?
[11] **MS. KRAMER:** Unless he sends me new
[12] ones. They originally sent us what is — you mean
[13] if they are framed and on the wall?
[14] **MR. FRIEDMAN:** Yes.
[15] **MS. KRAMER:** If they are framed and on
[16] the wall, yes, they are covered by L.
[17] **MR. FRIEDMAN:** If there happens to be
[18] any other ones —
[19] **MS. KRAMER:** If there are any more, I
[20] will send them to you. This is what they sent me.
[21] I will have them go back and check again.
[22] **Q:** Would the same apply to Dr. Nevyas-Wallace in
[23] terms of possibly there being certificates on the
[24] wall?
[25] **A:** Possibly, yes.

[1] Herbert J. Nevyas, M.D.
[2] **MR. FRIEDMAN:** And would you agree to do
[3] the same thing?
[4] **MS. KRAMER:** Yes. Put this in the same
[5] letter so that I know what I'm looking for.
[6] **Q:** Doctor, if they weren't kept on the wall,
[7] would there be any other place they would have been
[8] kept?
[9] **A:** They could be filed away. That does not mean
[10] it would be easy to find.
[11] **Q:** Have you looked for them specifically?
[12] **A:** No. I assigned it to the secretary to copy,
[13] and when I looked at this now, I realized she didn't
[14] copy LASIK specific certificates. She copied other
[15] things. She didn't understand.
[16] **MR. FRIEDMAN:** M is the board minutes of
[17] the meetings of the Delaware Valley Laser Surgery
[18] Partnership from 1995 to current.
[19] **MS. KRAMER:** There's no such documents
[20] to respond to that request. There are no meetings.
[21] There are no minutes. There is no board.
[22] **Q:** Doctor, the Delaware Valley Laser Surgery —
[23] let me ask you this. I know you answered it before.
[24] You said the Pennsylvania Eye Surgery Institute has
[25] another name to it?