

[1] Herbert J. Nevyas, M.D.
[2] **A:** Yes.
[3] **Q:** Doctor, I'm not referring to any particular
[4] dollar amount, but I want to know what are the
[5] assets of the corporation? You could say bank
[6] account. You don't have to tell me how much is in
[7] it, but I want to know what the corporation —
[8] **A:** The net value of the corporation?
[9] **MS. NEWMAN:** Objection.
[10] **MR. LAPAT:** Objection.
[11] **Q:** No, I want to know what the corporation owns
[12] that is distinct from you and —
[13] **MS. NEWMAN:** Objection.
[14] **MR. LAPAT:** Objection.
[15] **MS. KRAMER:** I'm going to object. What
[16] is the relevance of this?
[17] **MR. FRIEDMAN:** I'm trying to get it
[18] clear in my mind the difference between Dr. Nevyas
[19] and Nevyas Eye Associates. I can ask specifics.
[20] **MS. KRAMER:** I don't think at this point
[21] in time you are entitled to the assets of the
[22] corporation.
[23] **MR. FRIEDMAN:** That's why I said I was
[24] not interested in dollar amounts. I prefaced my
[25] remarks on that.

[1] Herbert J. Nevyas, M.D.
[2] **Q:** For example, Doctor —
[3] **MS. KRAMER:** How does that clarify for
[4] you a distinction between the owners of the
[5] corporation and the corporation itself? I don't
[6] understand.
[7] **MR. FRIEDMAN:** Well, I only have a few
[8] questions on this. One question would be, and I
[9] think you will see, who owns the building on City
[10] Line Avenue.
[11] **MS. NEWMAN:** Objection.
[12] **MR. LAPAT:** Objection. There is no
[13] relevance to that question. It has no bearing on
[14] this litigation.
[15] **THE WITNESS:** Should I answer it?
[16] (Discussion off the record between the
[17] witness and his attorney.)
[18] **MS. KRAMER:** It is not him or the
[19] corporation. They don't own the building.
[20] (Discussion off the record between the
[21] witness and his attorney.)
[22] **Q:** Were you going to say something?
[23] **A:** No, I was just talking to my attorney.
[24] **Q:** Doctor, do you have any income earned as an
[25] ophthalmologist that comes to you other than via

[1] Herbert J. Nevyas, M.D.
[2] Nevyas Eye Associates or Nevyas Eye Associates of
[3] New Jersey?
[4] **MR. LAPAT:** Objection.
[5] **MS. NEWMAN:** Objection.
[6] **MS. KRAMER:** You can answer it.
[7] **A:** Income earned as an ophthalmologist that
[8] comes to me? That is assuming that I have income
[9] earned as an ophthalmologist that comes to me from
[10] the corporation. The answer is no.
[11] **Q:** Doctor, do you have income from the Nevyas
[12] Eye Associates or Nevyas Eye Associates of New
[13] Jersey?
[14] **MR. LAPAT:** Objection. Again, that has
[15] no bearing on this litigation.
[16] **A:** Probably not, no.
[17] **Q:** They don't pay you?
[18] **A:** No.
[19] **MR. FRIEDMAN:** I wasn't trying to be
[20] tricky. I just wanted to know, does he have as a
[21] practicing ophthalmologist have an income that comes
[22] from anywhere else.
[23] **Q:** In your practice — I'm not talking about any
[24] other source that comes from anything other than
[25] Nevyas —

[1] Herbert J. Nevyas, M.D.
[2] **MS. KRAMER:** I don't see why you were
[3] entitled to the doctor's sources of income.
[4] **MR. FRIEDMAN:** It would only point me
[5] that he may have another ophthalmology practice
[6] somewhere.
[7] **MS. KRAMER:** Why don't you ask him that?
[8] **MR. LAPAT:** Why don't you ask him?
[9] **Q:** Do you have another eye practice that you
[10] have other than Nevyas Eye Associates or Nevyas Eye
[11] Associates of New Jersey?
[12] **MS. KRAMER:** That you are hiding from
[13] us?
[14] **A:** No, I don't.
[15] **MR. FRIEDMAN:** Thank you, counselor.
[16] And thank you, Doctor.
[17] **Q:** Doctor, there was a video recording made
[18] by — Doctor, what is MDTV?
[19] **MR. LAPAT:** Objection.
[20] **MS. KRAMER:** Go ahead. You can answer.
[21] **A:** As far as I know, it is a company run by a
[22] man named Paul Argent who makes videos for
[23] professional practices in the format of bringing
[24] some of the latest developments in various
[25] specialties to the fore and makes these videos and