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1 Q. You wouldn't agree with that?
2 A. No.
3 Q. You were just e-mailing Insead and
4 working trying to find fraud just for your own
5 pleasure?
6 MR. CHABOT: Same objection. I'm
7 sorry, object to the form of the question. It
8 also misstates prior testimony.
9 A. I would--
10 MR. KAPLAN: It's also completely
11 inappropriate and if it keeps up, this
12 deposition will stop.
13 A. As I stated previously. I was trying
14 to verify discrepancies and dates that were on
15 the application.
16 Q. And come back to the appropriateness
17 that Attorney Kaplan raised, the reason why we
18 are in the deposition today is because there's
19 a belief that you knew about those time gaps
20 long before you fired the Plaintiff.
21 MR. CHABOT: Just going to object to
22 the form, and because we're doing this as a
23 trial deposition, I'm going to move to strike

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1 the entire question which is basically
2 testimony by Dr. Isaacs.
3 MR. KAPLAN: I will join that.
4 Q. Do you think that you damaged the
5 reputation of Baker Isaacs by terminating its
6 CEO for fraud when in fact Dr. Isaacs disclosed
7 Arizona on the application to DHMC? That is
8 one question.
9 MR. CHABOT: Object to the form of the
10 question.
11 Q. I will restate it because there's one.
12 MR. KAPLAN: Are you going to restate
13 it?
14 Q. So we've established you've testified
15 that the Plaintiff disclosed Arizona on an
16 application to DHMC.
17 MR. KAPLAN: We have not established
18 that and I object to the question. It's a
19 misstatement of the evidence and of what
20 actually happened.
21 Q. Well, that's going to be determined.
22 So I believe you testified that. that will be
23 up for a judge, and then you terminated the CEO

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1 of Baker Isaacs for fraud on that same issue.
2 So didn't you damage the private equity company
3 created by the largest benefactor of
4 Dartmouth's history based on your mistake?
5 MR. CHABOT: Object to the form of the
6 question and to the statements of facts that
7 are not in evidence.
8 A. I would say no.
9 Q. So you believe even though Arizona was
10 stated at no less than four pages of the
11 employment application, the Plaintiff committed
12 fraud after he started employment at DHMC with
13 regards to Arizona?
14 MR. CHABOT: I'm going to object to
15 the form of the question. That question is
16 compound and confusing, and I'm also going to
17 object to the characterization of the
18 employment application.
19 DR. ISAACS: You can spin it with
20 whatever objection you want.
21 A. Well, the application that we have
22 been referring to consistently is the
23 application for residency submitted to the ERAS

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1 portal.
2 Q. So actually, just to clarify then, I
3 have not been referring to ERAS, I've been
4 referring to any and all application materials
5 to Dartmouth-Hitchcock medical center.
6 A. And I'm saying that the decision to
7 dismiss you from the program was based on the
8 omission on your ERAS application.
9 Q. Did anyone investigate this matter at
10 DHMC or Dartmouth College that you're aware of?
11 This entire lawsuit was it subject to any
12 investigation of your actions?
13 A. No.
14 Q. Were you ever asked to resign?
15 A. No.
16 Q. Did anyone other than your attorneys
17 review your actions?
18 A. The decision was reviewed by the
19 graduate medical education office.
20 Q. Dr. Bertrand?
21 A. Yes.
22 Q. So he played a role in any decision?
23 A. He was involved in the decision-making