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1 Arizona and USC?
2 MR. CHABOT: Object to the form.
3 A. In terms of the timing, I was not
4 aware of the Arizona residency training until
5 we sat down at that meeting in January, that
6 week in January where we made the decision to
7 place you on administrative leave. And I was
8 not aware of the USC Medical School issue until
9 sometime several weeks after that.
10 Q. How did you learn about USC?
11 A. Attorney Kaplan told me.
12 Q. Why would you ask Attorney Kaplan to
13 research that?
14 MR. CHABOT: I am going to object to
15 the form. That's misrepresenting prior
16 testimony.
17 A. I did not ask him to research that.
18 Q. Did anyone at Dartmouth know about my
19 enrollment at USC prior to that?
20 A. Not to my knowledge. Sorry.
21 MR. CHABOT: That's okay.
22 Q. Would you know if someone did?
23 MR. CHABOT: I am going to object on

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1 the grounds of foundation.
2 A. If someone knew and never mentioned it
3 to me, I would have no way of knowing that they
4 knew.
5 Q. Actually now you may have learned
6 things through the lawsuit, have you learned
7 since then that someone knew before you?
8 A. No.
9 Q. Do you know any psychiatrists at the
10 UCLA Neuropsychiatric Institute in Los Angeles?
11 A. I don't think so.
12 Q. Have you ever spoken to a Dr. Wayne
13 Sandler?
14 A. Not that I'm aware of.
15 Q. Do you know any psychiatrists at the
16 University of Miami Teaching Program?
17 A. Yes, I think I do.
18 Q. Who do you know there?
19 A. Jorge Sortello.
20 Q. Anyone else?
21 A. I don't think so.
22 Q. Do you know anyone who's ever treated
23 the Plaintiff medically aside from Dartmouth

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1 Hitchcock?
2 A. Not that I'm aware of.
3 Q. Do you know a Dr. Ben Boswell?
4 A. No.
5 Q. Have you ever heard that name, a
6 psychiatry resident?
7 A. No.
8 Q. Did you know any Dr. Graves in the
9 southern hemisphere?
10 A. No.
11 Q. Do you know Dr. Greenaw in the sleep
12 department?
13 A. Yes.
14 Q. How do you know him?
15 A. He's one of my colleagues at DHMC.
16 Q. Are you closer to him than other
17 colleagues, or is he just kind of an adjunct
18 colleague?
19 MR. KAPLAN: Object to the form.
20 A. We have relatively little professional
21 overlap other than his being the fellowship
22 director for the sleep program, so most of our
23 connection is through our interest in resident

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1 and fellowship education.
2 Q. Did you ever speak to him about the
3 Plaintiff's sleep studies with him?
4 A. No.
5 Q. Do you know a Dr. Amy Baughman?
6 A. No.
7 Q. Have you ever heard that name?
8 A. No.
9 Q. Do you know a Dr. Robert Baughman?
10 A. No.
11 Q. You don't know, do you know what the
12 NINDH is of the NIH?
13 A. No.
14 Q. Could you guess what NINDS stands for?
15 A. That's what I'm trying to figure out.
16 MR. CHABOT: I'm going to instruct you
17 not to guess. We're not here to provide
18 guesses or speculation.
19 Q. Do you know anyone at Dartmouth
20 Hitchcock or Dartmouth College that might know
21 Dr. Robert Baughman?
22 MR. CHABOT: Objection to foundation.
23 A. I don't know who he is, so it's hard