

ATTORNEYS' EYES ONLY

02:31:35

1 MS. STERK: Objection. Vague. Calls for speculation.

2 THE WITNESS: With only looking at one month, I can't  
3 say whether it was high or not.

4 BY MR. LIMANDRI:

02:31:45

5 Q Okay. Let's go then to Exhibit 2405. Before we do  
6 that, let me ask one more question about 2212, the invoice  
7 we just looked at. You mentioned you thought there was an  
8 accreditation by PPFA in 2012. Do you know if that was  
9 before or after this time frame of this invoice, which was  
10 sent on September 5th, 2012?

02:32:28

11 A I know that it was before. I remember it was in  
12 June of 2012, the accreditation.

13 Q Okay. Thank you. Do you have any idea whether or  
14 not anyone from the accreditation team actually reviewed any  
15 of PPMM's invoices that were sent to Stem-Express when PPFA  
16 accreditors conducted their review?

02:32:45

17 MS. STERK: Objection. Calls for speculation. Vague.

18 THE WITNESS: I don't know. They -- there was review  
19 of financial statements and that sort of thing, but I have  
20 no idea if it included any of this.

02:33:07

21 BY MR. LIMANDRI:

22 Q Do you know who, if anyone, from PPMM would know  
23 whether or not the accreditors from PPFA reviewed actual  
24 PPMM invoices to Stem-Express?

02:33:27

25 MS. STERK: Objection. Calls for speculation.

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1 THE WITNESS: I don't know if the financial department  
2 kept copies of specifically what PPFA reviewed or not.

3 BY MR. LIMANDRI:

02:33:42

4 Q Okay. So you don't know who at PPMM would know  
5 that information?

6 A Not specifically. Somebody in the accounting  
7 department.

8 Q Okay. Going back then to 2405. Have you seen this  
9 document before, Dr. Furgerson?

02:34:02

10 A No.

11 Q Okay. It's -- I'll represent my understanding is  
12 it's a Stem-Express brochure, referring to the last page.

13 And I don't know if it would refresh your recollection at  
14 the bottom of the second page, it's got a quote that

02:34:18

15 purports to be from you. It says, our partnership with  
16 Stem-Express is beneficial in a number of ways. First, it  
17 allows us to contribute to life-saving research that is  
18 advancing, diagnostic, and medical care. Second,

02:34:41

19 Stem-Express has a plug-in solution that allows us to add  
20 additional clinics quickly. Lastly, I feel confident that  
21 our patients anonymity is secure through their strict  
22 protocols and practices. That's attributed to Dr. Dorothy  
23 Furgerson, Mar Monte.

02:35:05

24 Had you seen this particular page with that particular  
25 quote that I just read prior to today?

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02:35:08

1 MS. STERK: Objection. Vague.

2 THE WITNESS: I had not seen the page, no.

3 BY MR. LIMANDRI:

4 Q Okay. Do you recall providing Plan -- do you

02:35:14

5 recall providing Stem-Express with permission to use your  
6 quote in its promotional brochure?

7 MS. STERK: Objection. Vague. Lacks foundation.

8 THE WITNESS: No.

9 BY MR. LIMANDRI:

02:35:27

10 Q Do you recall actually making this quote?

11 MS. STERK: Objection. Lacks foundation.

12 THE WITNESS: I did not write this quote.

13 BY MR. LIMANDRI:

14 Q Do you know who did?

02:35:37

15 A Someone at Stem-Ex, Stem-Express.

16 Q Okay. Did they get your permission to use it?

17 MS. STERK: Objection. Vague.

18 THE WITNESS: Yes. They got my permission to use it,  
19 but not specifically in a brochure.

02:35:50

20 BY MR. LIMANDRI:

21 Q Okay. What understanding did you have, if any, at  
22 the time you gave them permission to use your quote as to  
23 how they would use it?

02:36:03

24 A My understanding was that it would be used at one  
25 meeting or conference. And my impression was that it would

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1 be put on a poster at a booth at a meeting or conference.

2 Q I see. Do you know if it was put on a poster at a  
3 booth at a meeting or conference?

4 A I do not.

02:36:19

5 Q Do you know which meeting or conference they  
6 intended to use your quote?

7 A No, I do not.

8 Q Do you know if it was a meeting or conference you  
9 attended?

02:36:31

10 A I -- I think it would not be a meeting I had  
11 attended.

12 Q Would you typically attend meetings or conferences  
13 where other Planned Parenthood executives would be in  
14 attendance?

02:36:45

15 MS. STERK: Objection. Vague. Compound.

16 THE WITNESS: Yes.

17 BY MR. LIMANDRI:

02:36:53

18 Q What would be the types of conferences you would  
19 attend on any type of a regular basis where there would be  
20 other Planned Parenthood executives in attendance?

21 MS. STERK: Objection. Vague.

22 THE WITNESS: We had an annual meeting called the  
23 National Medical Conference.

24 BY MR. LIMANDRI:

02:37:05

25 Q Okay. In looking at this brochure now, does it

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02:37:09

1 refresh your recollection as to what meeting it was used at  
2 by Stem-Express?

3 MS. STERK: Objection. Asked and answered.

4 THE WITNESS: No. I don't think I knew what meeting.

02:37:22

5 BY MR. LIMANDRI:

6 Q Okay. If it was used at a NAF conference, do you  
7 know who would typically attend -- be expected to attend NAF  
8 conferences?

9 MS. STERK: Objection. Calls for speculation. Vague.

02:37:36

10 THE WITNESS: No.

11 BY MR. LIMANDRI:

12 Q Okay. Have you ever attended a NAF conference?

13 A No.

14 Q Okay. Would you -- NAF, you understand I'm sure,  
15 stands for National Abortion Federation, correct?

02:37:39

16 A Yes, I know that.

17 Q So you would expect people involved in some aspect  
18 of the abortion industry to attend a NAF conference, would  
19 you not?

02:37:53

20 MS. STERK: Objection. Calls for speculation. Vague.

21 THE WITNESS: I'm aware that some physicians who  
22 perform abortion attended NAF conferences.

23 BY MR. LIMANDRI:

24 Q Okay. Did Stem-Express indicate to you that they

02:38:08

25 intended to use your quote at a conference that would be

ATTORNEYS' EYES ONLY

02:38:13

1 attended by abortion doctors?

2 MS. STERK: Objection. Calls for speculation. Lack of  
3 foundation. Vague.

02:38:21

4 THE WITNESS: I don't believe they characterized or  
5 told me what meeting or conference it would be used at.

6 BY MR. LIMANDRI:

7 Q Did you have any understanding or expectation of  
8 what type of conference it would be used at?

9 A No.

02:38:32

10 Q On the first page of this pamphlet, it says, your  
11 clinic can advance medical -- biomedical research. And it  
12 says bullet point that says financially profitable.

13 Do you have an understanding of what they mean by that?

14 MS. STERK: Objection. Calls for speculation.

02:38:54

15 THE WITNESS: I do not.

16 BY MR. LIMANDRI:

17 Q It also, says easy to plug -- easy to implement  
18 plug-in solution. Do you have an understanding of what that  
19 means?

02:39:03

20 A I do not.

21 Q Because they use that phrase, I believe, in the  
22 quote that they attributed to you. Where it says,  
23 Stem-Express has a plug-in solution that allows us to add  
24 additional clinics quickly. Do you know what that means?

02:39:23

25 A I don't -- I don't know now and I don't think I

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02:39:26

1 knew then.

2 Q Okay. And when it says IRB certified consents, did  
3 you know what institutional review board had to review the  
4 consents?

02:39:40

5 MS. STERK: Objection. Lacks foundation. Calls for  
6 speculation.

7 BY MR. LIMANDRI:

8 Q Looking at the first page still. It says IRB  
9 consents. Do you know what that means?

02:39:49

10 MS. STERK: Objection. Calls for speculation.

11 THE WITNESS: It says to me that they would provide  
12 consent forms that had been reviewed by an IRB.

13 BY MR. LIMANDRI:

14 Q Okay. You don't know what IRB they're referring  
15 to?

02:40:03

16 A No.

17 Q Did you understand that they were going to use this  
18 brochure or poster with your quote in order to seek to  
19 obtain more potential sources of fetal tissue?

02:40:16

20 MS. STERK: Objection. Lacks foundation. Calls for  
21 speculation.

22 THE WITNESS: Yes, I understood that that's what they  
23 were trying to do.

24 BY MR. LIMANDRI:

02:40:25

25 Q Okay. Why is it you felt that you wanted to lend

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1 whatever prestige associated with your name to their -- and  
2 title to their effort to secure more potential sources of  
3 fetal tissue?

4 MS. STERK: Objection. Lacks foundation. Vague.

02:40:47

5 THE WITNESS: I felt they were doing societal good by  
6 increasing medical research, and I supported that.

7 BY MR. LIMANDRI:

8 Q Okay. At the bottom of the third page beginning at  
9 the top under the first sentence under advancing biomedical  
10 research together, it says, join the Stem-Express partner  
11 program that fiscally rewards clinics.

02:41:14

12 Do you have an understanding as to what they meant by  
13 "fiscally rewards clinics"?

14 MS. STERK: Objection. Calls for speculation.

02:41:29

15 THE WITNESS: No, I don't.

16 BY MR. LIMANDRI:

17 Q Okay. And under the last paragraph on the same  
18 page, easy to implement program, plus financial benefits.  
19 It says, Stem-Express promotes global biomedical research  
20 while also providing a financial benefit to your clinic.

02:41:44

21 Do you have any understanding as to what they meant  
22 when they talk about providing a financial benefit to  
23 clinics?

24 MS. STERK: Objection. Calls for speculation.

02:41:58

25 THE WITNESS: No, I don't.