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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

PLANNED PARENTHOOD FEDERATION)	
OF AMERICA, INC., et al.,)	
Plaintiffs,)	
vs.)	CASE NO. 3:16-cv-00236
CENTER FOR MEDICAL PROGRESS,)	(WHO)
et al.,)	
Defendants.)	

C O N F I D E N T I A L
VIDEO RECORDED DEPOSITION OF
DEBORAH NUCATOLA, M.D.
IRVINE, CALIFORNIA
APRIL 4, 2019

Reported by:
DEBBIE STRICKLAND
CSR 9036
No. 19-76852

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CONFIDENTIAL ATTORNEYS' EYES ONLY

1 A I don't know the answer to that question.

2 Q Do you remember any affiliates telling you
3 directly which tissue procurement organizations they
4 were working with?

10:31 5 A I do.

6 Q And what do you remember?

7 A I remember the affiliate which was called
8 Shasta Pacific at the time sending an email to Medical
9 Services telling us they were working with

10:31 10 StemExpress.

11 Q Do you remember approximately when that was?

12 A I don't.

13 Q Was it around this timeframe 2010?

14 A I don't know.

10:32 15 Q Was it before 2010?

16 A I still don't know.

17 Q Okay.

18 Was that the first that you had heard of

19 StemExpress or were you already familiar with them

10:32 20 when you received that email?

21 A That would have been the first time I heard
22 of StemExpress.

23 Q And did they ask for your permission to work
24 with them or why were they -- do you remember the
10:32 25 circumstances for that email?

CONFIDENTIAL ATTORNEYS' EYES ONLY

1 MR. KAMRAS: Compound.

2 BY MR. JONNA:

3 Q Let me rephrase the question.

4 What was said in that email to the best of
10:32 5 your memory?

6 A I don't remember the exact email, but from my
7 recollection, the gist of it was they wanted us to
8 know that they were working with StemExpress and
9 thought that they were -- it was a good relationship
10:32 10 and wanted to know if there was a way to let other
11 affiliates know about the opportunity.

12 Q Do you remember why they thought it was a
13 good relationship?

14 A I didn't ask.

10:32 15 Q So they were encouraging PPFA to allow
16 StemExpress to work with other affiliates?

17 MR. KAMRAS: Misstates the record.

18 THE WITNESS: No. And, again, I don't
19 remember the exact email. I think they were just
10:33 20 asking if there was a way to let other affiliates know
21 this was a possibility. They weren't asking PPFA to
22 do it. They were just asking how they could let other
23 affiliates know.

24 BY MR. JONNA:

10:33 25 Q And did you respond to that email?

CONFIDENTIAL ATTORNEYS' EYES ONLY

1 A I didn't. I believe at the time I had
2 another person on my team who I forwarded kind of this
3 issue to, and it became part of their responsibility.

4 Q And who is that?

10:33 5 A Her name is June Gupta.

6 Q Okay. So you forwarded the email to her, and
7 she was supposed to handle the situation and respond?

8 A Yeah. I don't know if I forwarded the exact
9 email. But this situation was passed on, this issue
10:33 10 was passed on to another person on my team.

11 Q Okay. And -- but she reported to you?

12 A Yes.

13 Q So before she made any decisions, she spoke
14 to you, got your approval?

10:33 15 A Ultimately.

16 Q And you don't have any way to estimate for us
17 what timeframe that was? I don't need you to give me
18 the exact year, but pre 2010, post 2010?

19 A No.

10:34 20 MR. KAMRAS: Asked and answered.

21 BY MR. JONNA:

22 Q Okay. It wasn't in 2015, though; correct?

23 MR. KAMRAS: Asked and answered.

24 BY MR. JONNA:

10:34 25 Q I didn't ask that.