

CONFIDENTIAL ATTORNEYS' EYES ONLY

1 donating the fetal tissue; correct?

2 A I said I believed that.

3 Q Right.

4 A I don't know any of the details of that.

12:03 5 Q Okay. You believe that.

6 And do you know if they employed an
7 independent auditor?

8 A I do not.

9 MR. KAMRAS: Asked and answered.

12:03 10 BY MR. JONNA:

11 Q Okay. So did you ever follow up with them to
12 ensure that that comply with this guidance from PPFA?

13 MR. KAMRAS: Asked and answered.

14 THE WITNESS: I did not.

12:03 15 BY MR. JONNA:

16 Q Why not?

17 MR. KAMRAS: Asked and answered.

18 THE WITNESS: I'm not sure why I would need
19 to.

12:03 20 BY MR. JONNA:

21 Q So this guidance was coming out from PPFA,
22 you happen to work at one of the affiliates, and they
23 happen to have a fetal tissue donation program, and
24 you happen to be privy to all these guidelines that
12:03 25 are being issued and memos that are being issued. I

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1 would -- that's why I'm asking if you followed up with
2 the affiliate that you were working with to make sure
3 they were complying with PPFA's guidance.

12:04

4 MR. KAMRAS: Misstates the record as to the
5 chronology, asked and answered, lacks foundation.

12:04

6 THE WITNESS: Okay. So I have a two-part
7 answer for you. Number one, I don't know when the
8 PPLA started participating in these programs. So I
9 couldn't tell you the date, so I don't know that they
10 were necessarily doing it when this memo was
11 recirculated, number one.

12 Number two, I assume that the medical
13 leadership at the affiliate had it taken care of.

14 BY MR. JONNA:

12:04

15 Q Who was the medical leadership at the
16 affiliate?

17 A I can tell you who the Medical Director is,
18 but I can't tell you the whole team. But the Medical
19 Director was Mary Gatter.

12:04

20 Q Okay. So you assume that, if they were
21 receiving payments, that they would be complying with
22 this memo and employing an independent auditor?

23 MR. KAMRAS: Misstates the record.

12:05

24 THE WITNESS: No. I didn't assume that they
25 would be employing an independent auditor. I assumed