collection purposes?


THE WITNESS: I know that our finance department did calculations of the cost of our space.

BY MR. LiMANDRI:

Q Have you seen those at all?

A No. It wasn't part of my job to see those.

Q Okay. Other than the consenting of the time -- strike that.

Other than the time it would have taken a medical assistant to consent a patient to donate fetal tissue, and other than incremental costs of the use of the space at a PPMM facility for tissue collection purposes, are there any other costs you can identify associated with the tissue procurement process that would have not been costs that PPMM would have already been incurring as part of their regular practices?


THE WITNESS: Well, there was their use of our equipment such as a microscope and supplies that they would use. And there's always overhead costs, everything that's done. And I don't believe you can -- you can't discount that and just say that it would have already been paid.

It's part of the cost of doing -- providing any service.
BY MR. LiMANDRI:
 Q Okay. Do you know what supplies would have been actually used by any TPO's as part of their work collecting tissues?


THE WITNESS: I did not observe the process, but I could imagine they would be using gloves and four-by-fours and cleaning -- cleaning fluids and --

BY MR. LiMANDRI:
 Q Do you know if any of the TPO's brought their own supplies with them?

A I --


Compound.

THE WITNESS: I do not know. I do not imagine that they did, but I don't know.

BY MR. LiMANDRI:
 Q Do you know if the types of costs that are allowed to be included by PPMM were specified in any statutes that dealt with fetal tissue collection practices?


THE WITNESS: I -- I do believe that there are specific -- within the regulations, there are -- they list
the reasonable costs.

BY MR. LiMANDRI:

Q Okay. Do you know if the reasonable costs that are listed within the regulations include fixed overhead components such as staff time?

MS. STERK: Objection. Calls for a legal conclusion.

Vague.

THE WITNESS: I do not know.

BY MR. LiMANDRI:

Q Okay. We'll look at some of those as we go along. Again, though PPMM would only be reimbursed if a sample was actually usable; is that correct?

A Yes.

Q So would it have been in PPMM's best interest in seeking to recoup its cause if it didn't try to maximum its number of usable samples?


THE WITNESS: In our mission to support medical research, it would be -- we would have liked to provide usable samples to further medical research.

BY MR. LiMANDRI:

Q And it's only by furnishing usable samples would you have your costs reimbursed, correct?

A Correct.