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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

PLANNED PARENTHOOD FEDERATION OF )  
AMERICA, INC., et al., )  
 )  
 Plaintiffs, )  
 )  
 vs. ) Case No. 3:16-CV-00236 (WHO)  
 )  
 THE CENTER FOR MEDICAL PROGRESS, )  
 et al., )  
 )  
 Defendants. )

HIGHLY CONFIDENTIAL ATTORNEYS' EYES ONLY  
VIDEOTAPED DEPOSITION OF  
KATHARINE SHEEHAN  
RANCHO SANTA FE, CALIFORNIA  
THURSDAY, MAY 30, 2019

Reported by:  
LEESAH TERAN  
CSR No. 12675  
19-79186

HIGHLY CONFIDENTIAL ATTORNEYS' EYES ONLY

10:25:53

1 A. Since 1999.

2 Q. Okay.

3 Did the -- did the relationship between

4 Planned Parenthood of Pacific Southwest begin in 1999

10:26:06

5 with ABR?

6 A. As far as I know, yes.

7 Q. Okay.

8 And then calling your attention to page 2 of  
9 the exhibit. Does -- do you recognize the agreement?

10:26:18

10 It says "This agreement was made as of June 1, 1999 by  
11 Advance Bioscience Resources, Inc., ABR" -- et cetera,  
12 et cetera, et cetera -- "and Planned Parenthood of San  
13 Diego and Riverside Counties, a professional  
14 corporation."

10:26:36

15 A. Yes.

16 Q. And why do you recognize the agreement?

17 MR. KAMRAS: Objection. Vague. And --

18 BY MR. BREEN:

19 Q. Let me ask you this --

10:26:47

20 MR. KAMRAS: I'm not sure what you're asking.

21 MR. BREEN: Well, I'll rephrase just based on  
22 the witness looking to her attorney, I'm assuming.

23 BY MR. BREEN:

10:26:58

24 Q. Had you seen this agreement prior to one week  
25 ago?

HIGHLY CONFIDENTIAL ATTORNEYS' EYES ONLY

10:27:00

1 A. Not that I remember.

2 Q. Okay.

3 How long did PPSW have a relationship with

4 ABR or does it continue to today?

10:27:27

5 A. It continues.

6 Q. Okay.

7 And then has PPSW had any other relationships

8 with other tissue procurement companies?

9 A. No.

10:27:42

10 Q. Okay.

11 Has PPSW had any other relationships with

12 researchers to procure fetal tissue?

13 A. Yes.

14 Q. Okay.

10:27:55

15 And which -- and I'll ask just one more  
16 question. Has PPSW had any relationships with research  
17 institutions in relation to procurement of fetal tissue?

18 A. Yes.

19 Q. Okay.

10:28:09

20 And maybe -- when I say "researchers" and  
21 "research institutions" do you -- is it fair to say you  
22 would see those terms as interchangeable?

23 A. I think you're asking me if we have a  
24 relationship with specific researchers and the

10:28:25

25 institution that they work for?