Case 3:16-cv-00236-WHO Document 1066-28 Filed 04/08/20 Page 12 of 30

Dkt. 611-5, 284 of 517

CONFIDENTIAL ATTORNEYS' EYES ONLY

	2	
	1	Q Okay. But has there ever been a case where
	2	you have to change the presentation in order to get
	3	intact fetal tissue?
	4	A No.
02:57	5	Q Okay.
	6	And when you said, "We've been pretty
	7	successful with that," you're talking about we as
	8	including you; correct?
	9	MR. KAMRAS: Vague. You're talking about
02:57	10	back to the clip that we just watched?
	11	BY MR. JONNA:
	12	Q Do you know what I'm talking about?
	13	A I believe you're asking the sentence that I
	14	just said in that clip.
02:57	15	Q Yeah. And you said, "We've been pretty
	16	successful at that"?
	17	A Yes. I was referring to PPLA.
	18	Q Including you?
	19	A Yes, including me. I worked at PPLA.
02:57	20	Q Okay. Let me go to 12:55:30, frame 017936.
	21	I want you to pay attention to this waitress and the
	22	conversation.
	23	(Video played.)
	24	BY MR. JONNA:
02:58	25	Q You saw the waitress in that clip?

Dkt. 611-5, 285 of 517 CONFIDENTIAL ATTORNEYS' EYES ONLY

	1	A I did.
	2	Q And you saw that you continued your
	3	conversation while she was there?
	4	A I said I'm trying to think about the
02:58	5	affiliates up and down the west coast. I don't
	6	believe there's anything sensitive by saying that
	7	sentence in front of anyone.
	8	Q Okay. So my question was, did you see the
	9	waitress in the clip? You said yes. And she was
02:58	10	there while you were talking to Dr. Daleiden; correct?
	11	A Absolutely.
	12	Q And she could hear what you were saying;
	13	correct?
	14	MR. KAMRAS: Calls for speculation.
02:58	15	THE WITNESS: She could I assume.
	16	BY MR. JONNA:
	17	Q Okay.
	18	Is it your testimony that there are certain
	19	times in the conversation where the conversation
02:58	20	converted from confidential to non-confidential and
	21	vice versa?
	22	A Yes.
	23	Q So what parts of this conversation were
	24	not were confidential in your view?
02:58	25	A Without watching the entire transcript and