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# Transcript of Melissa Hope Shachnovitz

**Date:** January 19, 2018

**Case:** O'Connell -v- Brigham, M.D., et al.

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Transcript of Melissa Hope Shachnovitz  
Conducted on January 19, 2018

<p style="text-align: center;">1</p> <p>1 IN THE UNITED STATES DISTRICT COURT</p> <p>2 FOR THE DISTRICT OF MARYLAND</p> <p>3</p> <p>4 CHRISTY T. O'CONNELL, :</p> <p>5 Plaintiff : </p> <p>6 v. : Case No. JFM-14-1339</p> <p>7 STEVEN C. BRIGHAM, M.D., :</p> <p>8 et al. : </p> <p>9 Defendants;</p> <p>10</p> <p>11 Deposition of MELISSA HOPE SHACHNOVITZ</p> <p>12 Elkton, Maryland</p> <p>13 Friday, January 19, 2018</p> <p>14 11:00 a.m.</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20 Job No.: 173103</p> <p>21 Pages: 1 - 79</p> <p>22 Reported By: Dawn M. Hart, RPR/RMR/CRR</p>	<p style="text-align: center;">3</p> <p>1 APPEARANCES</p> <p>2 ON BEHALF OF THE PLAINTIFF:</p> <p>3 EMILY C. MALARKEY, ESQUIRE</p> <p>4 BEKMAN, MARDER &amp; ADKINS, LLC</p> <p>5 300 West Pratt Street</p> <p>6 Suite 450</p> <p>7 Baltimore, Maryland 21201</p> <p>8 (410) 539-6633</p> <p>9</p> <p>10 ON BEHALF OF THE DEFENDANTS:</p> <p>11 CHRISTOPHER J. GREANEY, ESQUIRE</p> <p>12 VERNICK &amp; ASSOCIATES</p> <p>13 111 Annapolis Street</p> <p>14 Annapolis, Maryland 21401</p> <p>15 (443) 333-4044</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p>
<p style="text-align: center;">2</p> <p>1 Deposition of Melissa Hope Shachnovitz,</p> <p>2 held at the law offices of:</p> <p>3</p> <p>4 BROWN, BROWN &amp; YOUNG</p> <p>5 212 East Main Street</p> <p>6 Elkton, Maryland 21921</p> <p>7 (410) 392-3900</p> <p>8</p> <p>9</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20 Pursuant to Notice, before Dawn M. Hart,</p> <p>21 RPR/RMR/CRR and Notary Public in and for the State of</p> <p>22 Maryland.</p>	<p style="text-align: center;">4</p> <p>1 CONTENTS</p> <p>2 EXAMINATION OF MELISSA HOPE SHACHNOVITZ PAGE</p> <p>3 By Ms. Malarkey 5</p> <p>4</p> <p>5</p> <p>6</p> <p>7 EXHIBITS</p> <p>8 (No Exhibits were marked.)</p> <p>9</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p>

Transcript of Melissa Hope Shachnovitz  
 Conducted on January 19, 2018

<p style="text-align: right;">5</p> <p>1 PROCEEDINGS</p> <p>2 MELISSA HOPE SHACHNOVITZ</p> <p>3 being first duly sworn or affirmed to</p> <p>4 testify to the truth, the whole truth, and nothing but</p> <p>5 the truth, was examined and testified as follows:</p> <p>6 EXAMINATION BY COUNSEL FOR THE PLAINTIFF</p> <p>7 BY MS. MALARKEY:</p> <p>8 Q Okay. Ms. Shachnovitz -- Melissa -- we just</p> <p>9 briefly met off the record. I'm Emily Malarkey. I</p> <p>10 represent the Plaintiff in the case whose name is</p> <p>11 Christy O'Connell.</p> <p>12 A Okay.</p> <p>13 Q Do you know her?</p> <p>14 A I don't know the patient, no. I know the</p> <p>15 name.</p> <p>16 Q You know of her?</p> <p>17 A Just from correspondence, I saw it come</p> <p>18 through, yes.</p> <p>19 Q So the purpose of the deposition here today</p> <p>20 is for me to get an opportunity just to know what</p> <p>21 information you may or may not know --</p> <p>22 A Right.</p>	<p style="text-align: right;">7</p> <p>1 A All medical.</p> <p>2 Q Okay.</p> <p>3 A So accreditation, if your office needs to</p> <p>4 become accredited or licensed, management.</p> <p>5 Q Okay. Well, give me some examples of some</p> <p>6 of your clients.</p> <p>7 A Garden State Gynecology. I'm working with</p> <p>8 two of their locations, in Moorestown and Princeton.</p> <p>9 Q So consulting to private practice --</p> <p>10 A Exactly. For management and their</p> <p>11 accredited facilities. So when you maintain</p> <p>12 accreditation with an accreditation agency there are</p> <p>13 regulatory things you make sure you comply with,</p> <p>14 things like that.</p> <p>15 Q Tell me a little bit about your educational</p> <p>16 background. Where did you --</p> <p>17 A My educational background is completely</p> <p>18 irrelevant to what I do.</p> <p>19 Q I'm sure it is.</p> <p>20 A As most people.</p> <p>21 Q Yeah, right.</p> <p>22 A I went to Temple University for early</p>
<p style="text-align: right;">6</p> <p>1 Q -- about this lawsuit.</p> <p>2 A Right.</p> <p>3 Q So thank you, I appreciate your willingness</p> <p>4 to cooperate and attend.</p> <p>5 A Yes.</p> <p>6 Q And I hope that I won't bother you too long.</p> <p>7 So why don't we just start, if you could</p> <p>8 just tell me a little bit about yourself. What is</p> <p>9 your current residential address?</p> <p>10 A 1110 Tabor, T-A-B-O-R, Lane, Philadelphia,</p> <p>11 19111.</p> <p>12 Q And where do you currently work?</p> <p>13 A I'm actually an independent contractor, so I</p> <p>14 do consulting, so I work for myself essentially. I</p> <p>15 have an LLC.</p> <p>16 Q What is the name of your LLC?</p> <p>17 A Premier Management and Consulting Services,</p> <p>18 LLC.</p> <p>19 Q Okay. And do you have employees?</p> <p>20 A No. Myself.</p> <p>21 Q Just you. And what kind of consulting do</p> <p>22 you do?</p>	<p style="text-align: right;">8</p> <p>1 childhood education.</p> <p>2 Q Okay. So tell us, you know, based on your</p> <p>3 employment history, how did you get to where you are</p> <p>4 now?</p> <p>5 A I would say in the '90s I actually started</p> <p>6 in this industry. I suspect around mid 90s, in</p> <p>7 Philadelphia, just working in a family planning</p> <p>8 facility, answering the phones, eventually I evolved</p> <p>9 to management, and 20 years -- plus years later I'm</p> <p>10 still in this.</p> <p>11 Q Yeah. So did you ever work in early</p> <p>12 childhood education?</p> <p>13 A No. I did my practicum and I said I don't</p> <p>14 like children enough to have 30 of them at one time.</p> <p>15 Q What year did you graduate from Temple?</p> <p>16 A I did not. I dropped out at my practicum to</p> <p>17 change my major and that's when I picked up the</p> <p>18 position at the family planning facility and then</p> <p>19 never went back.</p> <p>20 Q All right. So what is the name of the first</p> <p>21 family planning agency or practice that you worked</p> <p>22 for?</p>

Conducted on January 19, 2018

9	<p>1 <b>A Gynecologic Surgical -- Gynecological</b></p> <p>2 <b>Surgical Consultants.</b></p> <p>3 Q Okay. Who was your boss at Gynecological</p> <p>4 Surgical Consultants?</p> <p>5 <b>A Alan Klein.</b></p> <p>6 Q Did that practice, the Gynecological</p> <p>7 Surgical Consulting, to your knowledge, have anything</p> <p>8 to do with Steven Brigham?</p> <p>9 <b>A No.</b></p> <p>10 Q Do you know if Dr. Klein knows Dr. Brigham?</p> <p>11 <b>A I don't know.</b></p> <p>12 Q Okay.</p> <p>13 <b>A I mean it's a relatively small niche field.</b></p> <p>14 <b>I would imagine perhaps, but I can't say specifically</b></p> <p>15 <b>if they do or they don't.</b></p> <p>16 Q So your first job with Gynecologic Surgery</p> <p>17 Consulting [sic] was sort of a receptionist,</p> <p>18 administrative?</p> <p>19 <b>A Right.</b></p> <p>20 Q And how long did you work for that group?</p> <p>21 <b>A I worked for that group, and they then</b></p> <p>22 <b>evolved into other locations through 2012.</b></p>	11	<p>1 <b>planning industry, and you know, dozens of offices,</b></p> <p>2 <b>and he was well -- well-known.</b></p> <p>3 Q Were you familiar with any of his offices?</p> <p>4 <b>A No.</b></p> <p>5 Q So --</p> <p>6 <b>A I mean I knew where he had offices, but I'd</b></p> <p>7 <b>never been to any of his offices and couldn't tell you</b></p> <p>8 <b>specifically anything about them. But I was familiar</b></p> <p>9 <b>with where many of them were just from patients</b></p> <p>10 <b>reporting and things like that.</b></p> <p>11 Q So you knew of him by reputation?</p> <p>12 <b>A Correct. And actually I think we had some</b></p> <p>13 <b>mutual employees, too, now that I remember. Couple of</b></p> <p>14 <b>my employees actually worked for him, that were</b></p> <p>15 <b>working with me part-time, they worked for one of his</b></p> <p>16 <b>facilities, too, part-time, so I knew him through that</b></p> <p>17 <b>also.</b></p> <p>18 Q All right. So tell me, in 2012, how did the</p> <p>19 first contact get initiated; did he call you, did you</p> <p>20 call him, if you remember?</p> <p>21 <b>A I believe that he called me, if I recall. I</b></p> <p>22 <b>believe Dr. Taylor gave him my phone number and he</b></p>
10	<p>1 Q Okay.</p> <p>2 <b>A And when those practices closed, that's when</b></p> <p>3 <b>I became employed with Dr. Brigham.</b></p> <p>4 Q All right. And did you start working for</p> <p>5 Dr. Brigham in 2012?</p> <p>6 <b>A I did.</b></p> <p>7 Q And tell me how that came about. How did</p> <p>8 you get that job, where was it?</p> <p>9 <b>A I -- again, because it's a niche field, one</b></p> <p>10 <b>of the doctors I worked with through Alan Klein's</b></p> <p>11 <b>group, once we decided the practices were closing, he</b></p> <p>12 <b>said, oh, I know a doctor that would love to hire you,</b></p> <p>13 <b>this and that, and he laid the groundwork, provided</b></p> <p>14 <b>the contact. I met with Dr. Brigham and eventually</b></p> <p>15 <b>started with him.</b></p> <p>16 Q Okay. Did you know Dr. Brigham at all?</p> <p>17 <b>A I had never met him before we first met in</b></p> <p>18 <b>his attempt to recruit me. Of course I'd heard of</b></p> <p>19 <b>him, but I had never met him, no.</b></p> <p>20 Q So prior to meeting him in 2012, how had you</p> <p>21 heard of him?</p> <p>22 <b>A That he was kind of a mogul in the family</b></p>	12	<p>1 <b>called me.</b></p> <p>2 Q Was there an interview?</p> <p>3 <b>A Yeah, I did go to his office in Voorhees, I</b></p> <p>4 <b>can't say exactly when, but myself and actually</b></p> <p>5 <b>another employee that was with Dr. Klein's group that</b></p> <p>6 <b>was closing, I remember we both went and interviewed</b></p> <p>7 <b>with his practice.</b></p> <p>8 Q And when you say you went to Voorhees and</p> <p>9 interviewed with his practice, what practice are you</p> <p>10 referring to?</p> <p>11 <b>A Well, he had multiple locations, you know.</b></p> <p>12 <b>Now she took a position in, I believe it was the</b></p> <p>13 <b>Hamilton location.</b></p> <p>14 Q And what other locations were you aware of</p> <p>15 as being Dr. Brigham's practices?</p> <p>16 <b>A Well, I believe he had five, six, or seven</b></p> <p>17 <b>in New Jersey.</b></p> <p>18 Q Okay.</p> <p>19 <b>A I think he had some in Virginia, I think</b></p> <p>20 <b>there was a couple. And then there was Associates</b></p> <p>21 <b>which wasn't -- he provided the doctors for the</b></p> <p>22 <b>practices that were in Maryland, so ...</b></p>

Transcript of Melissa Hope Shachnovitz  
 Conducted on January 19, 2018

13	<p>1 Q You're referring to Associates In OB/GYN          2 Care?          3 <b>A Exactly. That -- Associates was the entity          4 that I was the administrator for. AMA was who we          5 contracted our doctors from for Associates. So that          6 was -- AMA was his entity.</b>          7 Q Okay. I forgot to ask you when we got          8 started. Have you met Mr. Greaney before?          9 <b>A I have not, no.</b>          10 Q Did you have an opportunity to speak to any          11 lawyer before coming here today?          12 <b>A No.</b>          13 Q Have you spoken to Dr. Brigham before coming          14 here today?          15 <b>A No.</b>          16 Q Have you spoken to anybody to get advice or          17 to talk about --          18 <b>A No.</b>          19 Q -- what we're doing here today?          20 <b>A No.</b>          21 Q Okay. So when you first were hired by Dr.          22 Brigham, who was your actual employer?</p>	15	<p>1 it?          2 <b>A Who the owner of Associates In OB/GYN? I          3 think Dr. Walker.</b>          4 Q Okay. Is this Kimberly Walker?          5 <b>A Kimberly Walker, yes.</b>          6 Q And what was your understanding of          7 Dr. Brigham's relationship with Associates In OB/GYN          8 Care?          9 <b>A That he provided the physicians through          10 American Medical. That there was, I imagine, some          11 kind of contract in place that he would provide the          12 physicians that would perform services throughout the          13 four Maryland offices.</b>          14 Q And we're talking about the Maryland offices          15 in Baltimore, Cheverly, Silver Spring and Frederick?          16 <b>A Correct.</b>          17 Q While you were the administrator at          18 Associates In OB/GYN Care, were there any other          19 offices in Maryland?          20 <b>A No.</b>          21 Q And did you go to all four of those          22 locations?</p>
14	<p>1 <b>A Well, I worked for Associates, so I worked          2 with Dr. Walker for Associates, but I also did consult          3 work for some of his offices in New Jersey, again for          4 regulatory issues. And in that capacity there were          5 several district managers throughout.</b>          6 Q Okay. When Dr. Brigham hired you in 2012          7 what was your title, if you had one?          8 <b>A I don't believe I had a specific title          9 honestly.</b>          10 Q Okay. And tell me, I've heard at least two          11 different roles if I'm following, you did some consult          12 work for the regulatory issues for the New Jersey          13 clinics, but you also had a role in the Maryland          14 clinics with Associates In OB/GYN?          15 <b>A Correct. I was the administrator for the          16 Associates In OB/GYN offices.</b>          17 Q So you were the administrator, your title          18 with respect to the Maryland offices was          19 administrator?          20 <b>A Correct.</b>          21 Q And by Maryland offices, we're talking about          22 the clinics that were owned by whom as you understand</p>	16	<p>1 <b>A I did.</b>          2 Q What was your understanding as to who owned          3 American Medical Associates?          4 <b>A I believe Dr. Brigham did. I -- to my          5 knowledge he did.</b>          6 Q Okay. Who paid your paychecks?          7 <b>A Associates In OB/GYN.</b>          8 Q And I'm sorry, just so we can establish a          9 time frame, your job with Associates In OB/GYN Care          10 started in 2012?          11 <b>A Correct.</b>          12 Q When did it end?          13 <b>A 2014.</b>          14 Q And we'll get back to that, but where have          15 you worked since 2014?          16 <b>A Princeton Health Care Services.</b>          17 Q Where is that?          18 <b>A In Princeton.</b>          19 Q And what have you done for Princeton health          20 care services?          21 <b>A Administrator.</b>          22 Q Is Princeton Health Care Services a family</p>

Conducted on January 19, 2018

<p style="text-align: right;">17</p> <p>1 planning agency?</p> <p>2 <b>A It is, yes.</b></p> <p>3 Q How long did you work for Princeton Health</p> <p>4 Care Services?</p> <p>5 <b>A Until current. I just became an independent</b></p> <p>6 <b>contractor this year, in January. In January I</b></p> <p>7 <b>started officially as an independent. Princeton</b></p> <p>8 <b>Health Care is also Garden State Gynecology. They</b></p> <p>9 <b>d/b/a as Garden State. Until December 31 I was</b></p> <p>10 <b>essentially still an employee of Princeton Health</b></p> <p>11 <b>Care.</b></p> <p>12 Q So from sometime in 2014 until the end of</p> <p>13 2017 you were an employee of Princeton Health Care</p> <p>14 Services?</p> <p>15 <b>A Correct.</b></p> <p>16 Q Which operates as Garden State Gynecology?</p> <p>17 <b>A Correct.</b></p> <p>18 Q And since just a couple of weeks ago you are</p> <p>19 no longer their employee?</p> <p>20 <b>A Correct.</b></p> <p>21 Q But you do consulting for them?</p> <p>22 <b>A Correct. Exactly.</b></p>	<p style="text-align: right;">19</p> <p>1 <b>familiar with regulatory issues, so I would consult</b></p> <p>2 <b>with them as far as all the regulations/modifications</b></p> <p>3 <b>that they would need to make for the office.</b></p> <p>4 Q And those are specifically relating to</p> <p>5 offices only in New Jersey?</p> <p>6 <b>A They were New Jersey, and I also would</b></p> <p>7 <b>consult with Virginia Beach. Virginia Beach, actually</b></p> <p>8 <b>they were not getting accredited, they were getting</b></p> <p>9 <b>licensed, so their regulations were even stricter than</b></p> <p>10 <b>accreditation regulations, so I made a few trips to</b></p> <p>11 <b>Virginia Beach, also to kind of go over regulatory</b></p> <p>12 <b>stuff with her.</b></p> <p>13 Q Did any of your regulatory consulting with</p> <p>14 Dr. Brigham revolved around the Maryland offices?</p> <p>15 <b>A Well, yeah. I was the administrator there</b></p> <p>16 <b>so I did a lot of regulatory stuff in Maryland.</b></p> <p>17 Q Okay. So then tell me what -- you were the</p> <p>18 administrator of the Associates in OB/GYN Care?</p> <p>19 <b>A Right. That was my primary responsibility,</b></p> <p>20 <b>doing any regulatory stuff there, maintaining --</b></p> <p>21 Q Okay. So other than doing regulatory stuff</p> <p>22 to maintain licensure and accreditation -- well, let</p>
<p style="text-align: right;">18</p> <p>1 Q Do you do consulting for anyone else or are</p> <p>2 they your only client?</p> <p>3 <b>A It was just now that I decided to kind of go</b></p> <p>4 <b>on my own now that they're efficient and running well.</b></p> <p>5 <b>I started the practices with these doctors, so it took</b></p> <p>6 <b>them a few years to get them up and efficient and</b></p> <p>7 <b>profitable and doing well. So now while I still work</b></p> <p>8 <b>with them, my goal is to retain more clients and</b></p> <p>9 <b>potentially do the same thing.</b></p> <p>10 Q And grow your own business?</p> <p>11 <b>A Exactly. Exactly.</b></p> <p>12 Q Okay. Let's go back to your work with</p> <p>13 Dr. Brigham. Tell me about what you did separate from</p> <p>14 your work as the administrator at Associates In OB/GYN</p> <p>15 Care.</p> <p>16 <b>A Uh-huh.</b></p> <p>17 Q What work did you do for Dr. Brigham as a</p> <p>18 consultant?</p> <p>19 <b>A I would often consult with his district</b></p> <p>20 <b>managers. A few of the offices at that time when I</b></p> <p>21 <b>was there were getting accredited through an agency</b></p> <p>22 <b>called Quad ASF, four As and S-F, so -- I was very</b></p>	<p style="text-align: right;">20</p> <p>1 me back up. Did the Maryland clinics have --</p> <p>2 <b>A They did not have accreditation. They had</b></p> <p>3 <b>license -- they were licensed.</b></p> <p>4 Q What's the difference?</p> <p>5 <b>A In some states you're required to be</b></p> <p>6 <b>licensed. In some states you're required to be -- if</b></p> <p>7 <b>you're not required to be licensed, you usually,</b></p> <p>8 <b>depending upon the services you offered, required to</b></p> <p>9 <b>be accredited. So there are some agency, be it the</b></p> <p>10 <b>State or accreditation agency, that is kind of looking</b></p> <p>11 <b>over your shoulder making sure things are done right,</b></p> <p>12 <b>and then that everything is up to par the way that it</b></p> <p>13 <b>should be. So while some states require that to be</b></p> <p>14 <b>the actual state itself, or the Board of Physicians,</b></p> <p>15 <b>or the Department of Health, there are some states</b></p> <p>16 <b>that don't require it to be. So in those states</b></p> <p>17 <b>typically you are required to have an accreditation</b></p> <p>18 <b>from an outside source, be it AAAASF, JCAHO, there's</b></p> <p>19 <b>different agencies that can accredit you and that</b></p> <p>20 <b>involves honoring all of their standards and</b></p> <p>21 <b>inspections, sometimes biannual, depends upon the</b></p> <p>22 <b>agency.</b></p>

Conducted on January 19, 2018

<p style="text-align: right;">21</p> <p>1 Q So Maryland required family planning 2 agencies to be licensed? 3 <b>A Correct.</b> 4 Q And who -- 5 <b>A Around the time I started. Previously they 6 were not licensed, but I believe that went into effect 7 in 2012, or early '13. It was right around the time I 8 started. And I think that's why, you know, they 9 needed somebody like myself that had experience with 10 regulatory stuff.</b> 11 Q And in Maryland, what government agency 12 licenses family planning clinics? 13 <b>A It was -- let me think what it's called. 14 Bear with me for one second.</b> 15 <b>It's the Department --</b> 16 Q The Department of Health and Mental Hygiene? 17 <b>A Yes, Department of Health and Mental 18 Hygiene. Yes, exactly.</b> 19 Q Okay. So besides helping the Maryland 20 clinics get licensure, what if any other job 21 responsibilities did you have as administrator of the 22 Maryland clinics?</p>	<p style="text-align: right;">23</p> <p>1 <b>to, you know, how it got to there.</b> 2 Q But when you say upstairs, you're talking 3 about upstairs physically in New Jersey? 4 <b>A Yes. In New Jersey there was a place that 5 the phones rang, so I -- I recall visiting upstairs 6 and working with the representatives that answered, 7 representatives that answered the phones for Maryland.</b> 8 Q So is it your understanding that if a 9 Maryland patient wanted to get services at a Maryland 10 Associates in OB/GYN Care clinic, she would call the 11 advertised number for Associates in OB/GYN Care? 12 <b>A Right.</b> 13 Q But that number would ring at a centralized 14 call center located in New Jersey? 15 <b>A At sometimes, yes. If there were staff in 16 offices, of course it would be answered in the 17 offices, but after hours, weekend -- after hours and 18 weekends there was this, you know, second floor call 19 base that did answer the phone calls, yes.</b> 20 Q I'm sorry, I -- just for -- the other rule 21 that she didn't mention is we can't speak over one 22 another. So naturally you may completely understand</p>
<p style="text-align: right;">22</p> <p>1 <b>A Participate in, like advertising, you know, 2 marketing research to see, you know, where our pool of 3 patients were coming from to improve the patient 4 volume.</b> 5 Q Okay. Anything else? 6 <b>A I actually spent some time actually in the 7 call center.</b> 8 Q Where's the call center? 9 <b>A In New Jersey.</b> 10 Q So tell me how that works, that a Maryland 11 patient who wanted to receive services from Associates 12 in OB/GYN Care clinic, what number would they call and 13 where would it ring and who would answer? 14 <b>A I can't say specifically what number they 15 would call. Each office had an advertised phone 16 number.</b> 17 Q Okay. 18 <b>A I know their calls would ring upstairs, so I 19 did spend time upstairs working with representatives 20 saying specifically things that I would want said for 21 our Maryland patients. How that transpired, what 22 numbers they dialed, how that -- I'm really not aware</b></p>	<p style="text-align: right;">24</p> <p>1 what I'm about to ask you and you interject and answer 2 and that's the way people converse in normal life, but 3 she can't type two of us at once. Even though you 4 know what I'm going to ask, wait until I'm done 5 speaking, and I'll try my best to do the same for you. 6 <b>A Understood.</b> 7 Q If I ever cut you off, please let me know. 8 Say, I'm not done with my answer, and I'll shut up. 9 <b>A Okay.</b> 10 Q So do you recall the address of the call 11 center in Voorhees, New Jersey? 12 <b>A I do not. It was off Evesham Avenue.</b> 13 Q In Voorhees? 14 <b>A In Voorhees, yes. I don't recall the exact 15 address.</b> 16 Q Okay. So while you were administrator for 17 Associates in OB/GYN Care, how much time did you 18 actually spend in Maryland? 19 <b>A Probably a solid four days a week.</b> 20 Q Full days? 21 <b>A Uh-huh.</b> 22 Q And you were living in Philly at the time,</p>

Conducted on January 19, 2018

25	<p>1 or New Jersey?</p> <p>2 <b>A Philadelphia.</b></p> <p>3 Q Okay. That's a lot of driving.</p> <p>4 <b>A It is, absolutely. Up until December 31 I</b></p> <p>5 <b>often traveled to Maryland--I mean, I'm sorry, to</b></p> <p>6 <b>Moorestown which is just outside of New York.</b></p> <p>7 Q So who are the other employees -- or I don't</p> <p>8 even want to say employees. Let me ask it this way.</p> <p>9 Who were the other people that you recall -- whether</p> <p>10 they're doctors or staff people, you can let me</p> <p>11 know -- who worked physically in the Maryland clinics?</p> <p>12 As many as you can recall.</p> <p>13 <b>A Dr. Walker, Kelly -- the problem is I don't</b></p> <p>14 <b>know the last -- a lot of last names.</b></p> <p>15 Q I understand. Just --</p> <p>16 <b>A Okay.</b></p> <p>17 Q I'm just looking for what you do remember.</p> <p>18 So let's start with, you told me about Dr. Walker.</p> <p>19 <b>A Dr. Walker, Kim Walker.</b></p> <p>20 Q And Kelly, who was she?</p> <p>21 <b>A Kelly was an office manager for, I believe</b></p> <p>22 <b>Cheverly, but also traveled to other locations to</b></p>	27	<p>1 <b>Dominy, Dr. Panah, Dr. Basco, Dr. Rose.</b></p> <p>2 Q Do you know Dr. Rose's first name?</p> <p>3 <b>A Myron.</b></p> <p>4 Q Myron?</p> <p>5 <b>A Myron, I believe.</b></p> <p>6 Q It was a man?</p> <p>7 <b>A Yes.</b></p> <p>8 Q Any other doctors besides Dr. Dominy, Panah,</p> <p>9 Basco and Rose, and Walker?</p> <p>10 <b>A I don't believe there were any other</b></p> <p>11 <b>doctors.</b></p> <p>12 Q Any other staff that -- Oh, go ahead.</p> <p>13 <b>A I'm sorry. There was a nurse, Zara.</b></p> <p>14 Q Z-A --</p> <p>15 <b>A Z-A-R-A.</b></p> <p>16 <b>I'm sorry, I'm just trying to think of any</b></p> <p>17 <b>other employees I remember.</b></p> <p>18 <b>There was another R.N. I'm trying to</b></p> <p>19 <b>remember her name. I believe it was Neesa, N-E-E-S-A.</b></p> <p>20 <b>It could have been Meesa, though. I'm sorry, I'm</b></p> <p>21 <b>going back like four or five years.</b></p> <p>22 Q That's okay.</p>
26	<p>1 work.</p> <p>2 Q Okay.</p> <p>3 <b>A There was a Christine. She worked, I</b></p> <p>4 <b>believe in Baltimore primarily, but often our</b></p> <p>5 <b>employees traveled between multiple locations because</b></p> <p>6 <b>our patient sessions weren't long. So typically</b></p> <p>7 <b>patients would be in the office a couple of hours. So</b></p> <p>8 <b>instead of, you know, keeping staff there for eight</b></p> <p>9 <b>hours per se, there would be just a couple hours in</b></p> <p>10 <b>the Baltimore office, when they were through with</b></p> <p>11 <b>patients, staff would perhaps travel to Cheverly and</b></p> <p>12 <b>then there were patients scheduled in Cheverly that</b></p> <p>13 <b>afternoon. So we didn't have a huge staff because the</b></p> <p>14 <b>few staff we had often traveled between multiple</b></p> <p>15 <b>offices.</b></p> <p>16 Q Okay.</p> <p>17 <b>A There was Crystal -- Crystal -- I believe</b></p> <p>18 <b>her last name begins with a K, if that helps.</b></p> <p>19 Q I just want to know what you remember. If</p> <p>20 you remember last names, that's great. If not, just</p> <p>21 tell me.</p> <p>22 <b>A Then of course the doctors. There was Dr.</b></p>	28	<p>1 <b>A Off the top of my head I can't think of</b></p> <p>2 <b>anybody else. Right now that's all I can come up</b></p> <p>3 <b>with.</b></p> <p>4 Q Okay. And I think you said earlier as best</p> <p>5 you recall your paychecks were from Associates in</p> <p>6 OB/GYN Care?</p> <p>7 <b>A Well, actually I believe the name on my</b></p> <p>8 <b>paychecks might have been Health Care Delivery Corp.</b></p> <p>9 <b>You know, it was really odd, sort of an anomaly. If you</b></p> <p>10 <b>had health insurance through the agency you were</b></p> <p>11 <b>technically paid by a company called Health Care</b></p> <p>12 <b>Delivery Corporation. And I had health insurance for</b></p> <p>13 <b>my family. Where if you did not have health insurance</b></p> <p>14 <b>you were paid directly through the company, Associates</b></p> <p>15 <b>in OB/GYN Care.</b></p> <p>16 Q How do you know -- since you had health</p> <p>17 insurance --</p> <p>18 <b>A Yes.</b></p> <p>19 Q -- how do you know that people who didn't</p> <p>20 were paid by Associates in OB/GYN Care?</p> <p>21 <b>A Because most of my employees did not, so I</b></p> <p>22 <b>often handed out paychecks and knew that most --</b></p>



Conducted on January 19, 2018

29	<p>1 Q So the actual, like up in the upper</p> <p>2 left-hand corner where it says who the check is</p> <p>3 from --</p> <p>4 <b>A Right.</b></p> <p>5 Q -- that said Associates in OB/GYN Care?</p> <p>6 <b>A Right. Yes.</b></p> <p>7 Q Who signed those checks?</p> <p>8 <b>A All checks were signed by Nancy. She was</b></p> <p>9 <b>the CFO.</b></p> <p>10 Q Do you remember Nancy's last name?</p> <p>11 <b>A Lewis or Luke. Definitely one of those two.</b></p> <p>12 Q Where did Nancy Lewis or Luke live?</p> <p>13 <b>A Oh, I have no idea.</b></p> <p>14 Q Okay. Did you know her personally?</p> <p>15 <b>A I met her once or twice.</b></p> <p>16 Q Okay. And your paychecks were paid by</p> <p>17 Health Care Delivery Corp.?</p> <p>18 <b>A That's correct. Yes.</b></p> <p>19 Q Okay. Who signed your paychecks?</p> <p>20 <b>A Nancy.</b></p> <p>21 Q Did-- in the two-ish years that you worked</p> <p>22 with Associates in OB/GYN Care, did Dr. Brigham</p>	31	<p>1 <b>the physicians, but I believe the facilities</b></p> <p>2 <b>themselves or the staff, I don't believe that he had</b></p> <p>3 <b>any, any interaction. I can't say Dr. Walker, you</b></p> <p>4 <b>know, she was the manager, the district -- the manager</b></p> <p>5 <b>of the entire district.</b></p> <p>6 Q District meaning Maryland?</p> <p>7 <b>A Exactly. The Maryland district, yes.</b></p> <p>8 Q So what is your understanding as to who was</p> <p>9 the supervisor of the staff who worked in the Maryland</p> <p>10 clinics?</p> <p>11 <b>A Dr. Walker.</b></p> <p>12 Q And in terms of Dr. Brigham's interaction</p> <p>13 with the Maryland clinics, if I'm summarizing your</p> <p>14 understanding correctly, it was with Dr. Walker and</p> <p>15 with yourself and with the physicians whose staffed</p> <p>16 those clinics?</p> <p>17 <b>A Correct. Yes.</b></p> <p>18 Q What interaction did you have with Dr.</p> <p>19 Brigham Dr. Brigham that involved those Maryland</p> <p>20 clinics?</p> <p>21 <b>A If I had a complaint, honestly, about a</b></p> <p>22 <b>doctor, if a doctor was being tardy or difficult with</b></p>
30	<p>1 physically come to any of those Maryland locations?</p> <p>2 <b>A No.</b></p> <p>3 Q You never saw him in Maryland?</p> <p>4 <b>A No.</b></p> <p>5 Q Was there a holiday party that you attended</p> <p>6 ever in Maryland?</p> <p>7 <b>A I did not attend the Maryland holiday party</b></p> <p>8 <b>because, again, only because it was such a distance</b></p> <p>9 <b>for me.</b></p> <p>10 Q You're aware that one occurred?</p> <p>11 <b>A I believe, yeah, I think there was one every</b></p> <p>12 <b>year, yes.</b></p> <p>13 Q Do you know if Dr. Brigham attended the</p> <p>14 Maryland holiday party?</p> <p>15 <b>A I do not know.</b></p> <p>16 Q What if any interaction did you observe Dr.</p> <p>17 Brigham having with the Maryland clinics that were</p> <p>18 affiliated with Associates in OB/GYN Care?</p> <p>19 <b>A I know he interacted with the doctors. The</b></p> <p>20 <b>staff or the facilities, I don't think that there was</b></p> <p>21 <b>any interaction. But he interacted with the doctors.</b></p> <p>22 <b>He had interaction with me because I interacted with</b></p>	32	<p>1 <b>seeing patients or a patient complaint, I would make</b></p> <p>2 <b>Dr. Brigham aware. I would discuss it with the</b></p> <p>3 <b>physician of course, but also make Dr. Brigham aware.</b></p> <p>4 <b>Any issues that arose with physicians I would also</b></p> <p>5 <b>report them to Dr. Brigham.</b></p> <p>6 Q Was there -- other than reporting issues</p> <p>7 with doctors to Dr. Brigham, did you have any other</p> <p>8 interaction with Dr. Brigham that involved the running</p> <p>9 of the Maryland clinics in any way?</p> <p>10 <b>A When they had some regulatory trouble</b></p> <p>11 <b>because of, you know, some issues that happened with</b></p> <p>12 <b>the doctors, I recall during that time, which this was</b></p> <p>13 <b>probably 2012 or '13, it was not long after they were</b></p> <p>14 <b>licensed, not long after I was there, I remember I</b></p> <p>15 <b>often would have contact with him then because there's</b></p> <p>16 <b>a point that actually the doctors' licenses were</b></p> <p>17 <b>suspended so there were no physicians. Then there was</b></p> <p>18 <b>a point that the facility licenses were suspended. So</b></p> <p>19 <b>during that time I know I often would have contact</b></p> <p>20 <b>with him.</b></p> <p>21 Q And so if Dr. Walker was the owner of those</p> <p>22 clinics, why when they were in regulatory trouble was</p>

Conducted on January 19, 2018

33	35
<p>1 your contact often with Dr. Brigham?</p> <p>2 <b>A Because the regulatory trouble arose because</b></p> <p>3 <b>of the actions of one physician.</b></p> <p>4 Q Which one?</p> <p>5 <b>A Dr. Basco.</b></p> <p>6 Q And what happened with Dr. Basco?</p> <p>7 <b>A There was an incident that Dr. Basco refused</b></p> <p>8 <b>to do a patient -- refused to treat a patient because</b></p> <p>9 <b>she had, I believe it was his triplets and he didn't</b></p> <p>10 <b>want to treat -- first trimester patient but she was</b></p> <p>11 <b>pregnant with triplets. He said he didn't get paid</b></p> <p>12 <b>enough money to treat that patient, which again is an</b></p> <p>13 <b>issue that you need to take up with Dr. Brigham, not</b></p> <p>14 <b>with the facility, not while the patient is there and</b></p> <p>15 <b>waiting to be treated. And, you know, that caused --</b></p> <p>16 <b>he refused to treat that patient and that caused a</b></p> <p>17 <b>regulatory spiral that shuttered those offices.</b></p> <p>18 <b>But the patient was treated fine at Planned</b></p> <p>19 <b>Parenthood. But Dr. Basco had a protocol in place</b></p> <p>20 <b>that whenever a patient was 12 weeks, they would be</b></p> <p>21 <b>given a medication that would start to soften up their</b></p> <p>22 <b>cervix about an hour or so prior to him doing the</b></p>	<p>1 <b>patient had a condition called dilated cardiomyopathy,</b></p> <p>2 <b>which her condition, she could have been sitting on</b></p> <p>3 <b>her couch, in the grocery store, at any time this</b></p> <p>4 <b>could have happened. Unfortunately it happened in the</b></p> <p>5 <b>facility immediately after a procedure. So obviously,</b></p> <p>6 <b>with a patient death there's a lot of regulatory</b></p> <p>7 <b>things that happen, and the facilities were shut down</b></p> <p>8 <b>again at that point.</b></p> <p>9 <b>So unfortunately whenever a regulatory thing</b></p> <p>10 <b>sort of happens, it always stemmed from an issue with</b></p> <p>11 <b>the doctor, whenever a doctor has a patient that</b></p> <p>12 <b>expires there.</b></p> <p>13 Q Of course.</p> <p>14 <b>A You know, that caused --</b></p> <p>15 Q So which episode was first; the one with Dr.</p> <p>16 Basco, or the one with Dr. Dominy?</p> <p>17 <b>A I believe it was the one with Dr. Dominy. I</b></p> <p>18 <b>can't say for sure, but I believe Dr. Dominy's first.</b></p> <p>19 Q And were the clinics actually closed twice</p> <p>20 as in they were closed and reopened, and then closed</p> <p>21 and then reopened?</p> <p>22 <b>A Yes, yes -- or well, actually, I stand</b></p>
34	36
<p>1 <b>case. Once he saw that it was a triplet case and</b></p> <p>2 <b>said, I'm not getting paid enough money to do this, he</b></p> <p>3 <b>refused to do the case. So here the patient had</b></p> <p>4 <b>medication to soften her cervix and then no doctor to</b></p> <p>5 <b>come through and complete the procedure.</b></p> <p>6 Q So how did the regulatory proceedings begin</p> <p>7 as a result of that incident?</p> <p>8 <b>A Because essentially we abandoned -- we had</b></p> <p>9 <b>treated a patient and abandoned the patient without</b></p> <p>10 <b>not willing to complete this procedure. So the</b></p> <p>11 <b>patient was successfully completed at Planned</b></p> <p>12 <b>Parenthood, and then filed a complaint with the</b></p> <p>13 <b>Department, which led to an investigation, which shut</b></p> <p>14 <b>down all the offices.</b></p> <p>15 Q I see. So the patient made the complaint?</p> <p>16 <b>A Correct. Exactly.</b></p> <p>17 <b>And then there was another issue.</b></p> <p>18 <b>Dr. Dominy's patient, there was a death in the</b></p> <p>19 <b>Baltimore office, which again was completely</b></p> <p>20 <b>unrelated -- I spent a lot of time in court over this</b></p> <p>21 <b>case. The death was completely unrelated to Dr.</b></p> <p>22 <b>Dominy's care or to anything in the facility. The</b></p>	<p>1 <b>corrected. Perhaps after Dr. Dominy's patient they</b></p> <p>2 <b>might not have closed all of the facilities. They</b></p> <p>3 <b>might have just closed Baltimore.</b></p> <p>4 <b>After Dr. Basco's incident, I know all of</b></p> <p>5 <b>the facilities were closed. I don't recall if the</b></p> <p>6 <b>first time, once we demonstrated to the Department and</b></p> <p>7 <b>they reinspected, that closure was very short after</b></p> <p>8 <b>Dr. Dominy's patient. Maybe a couple of weeks. I</b></p> <p>9 <b>don't recall if that was all the offices or just</b></p> <p>10 <b>Baltimore, honestly.</b></p> <p>11 <b>But I know after Dr. Basco's incident, it</b></p> <p>12 <b>did close all of the offices because that was his</b></p> <p>13 <b>protocol in all of the offices for patients 12 weeks</b></p> <p>14 <b>and above, to give them this medication prior to.</b></p> <p>15 Q So how long were the facilities in Maryland</p> <p>16 closed after the incident and report -- and complaint</p> <p>17 about Dr. Basco?</p> <p>18 <b>A They were closed for a while for surgical</b></p> <p>19 <b>procedures. A while.</b></p> <p>20 Q Okay. Were you still an employee when they</p> <p>21 reopened?</p> <p>22 <b>A I think when they reopened and started doing</b></p>

Conducted on January 19, 2018

37	<p>1 just nonsurgical procedures -- what eventually  2 happened is their surgical licenses were revoked. I  3 think that right around the time I was leaving. I  4 might have been there for a month or two when they  5 reopened and were only doing nonsurgical procedures.  6 Q Do you know if they ever were able to do  7 surgical procedures after that?  8 A I don't believe, no, because I was involved  9 in those legal proceedings. When I left the agency,  10 that -- their licenses were suspended. We had lost  11 this appeal. I left at that point. I know that the  12 attorney said, you know, you can try and appeal again,  13 take it to, I don't know if it's Superior Court or  14 whatever the next level would be. It wasn't likely to  15 win. But I had left the company at that time so I  16 don't really know what happened. But I heard, and  17 just from seeing newspaper articles and things, that  18 licenses were revoked.  19 Q Who was the attorney, do you remember?  20 A Yes. Give me -- we're friends on Facebook.  21 I absolutely -- if I look at my phone I can definitely  22 tell you.</p>	39	<p>1 patients then. I don't recall exactly what happened,  2 but at one point they suspended all three of our  3 physician licenses, so again, it left the facility  4 unable to treat patients. So I know at that point  5 there was -- they were often working together trying  6 to recruit new physicians while the other physicians  7 that were currently suspended were trying to get their  8 licenses reinstated.  9 Q Dr. Brigham was working on finding other  10 physicians --  11 A Right. Exactly.  12 Q -- who had valid --  13 A Yeah. I know he and Dr. Walker would work  14 often on that. She was -- she was in Maryland also so  15 she was more hands-on, but you know, they were  16 employed essentially by American Medical, so obviously  17 it was a process that, that it both had to approve any  18 physicians that would join the practice.  19 Q Do you know of any other business functions  20 that American Medical Associates performed other than  21 finding doctors to staff the Maryland clinics?  22 A I believe that's all they did was find --</p>
38	<p>1 Q Yeah, sure.  2 A First name is Richard. That I know. I  3 can't remember his last name. As much time as I spent  4 with him.  5 (Retrieving.)  6 Bardos.  7 Q Is he in Maryland?  8 A Yes. Baltimore. I would say he was. I  9 would see him in his Baltimore office.  10 Q So again, your understanding, if Dr. Walker,  11 based on your understanding, was the owner of  12 Associates in OB/GYN Care when there were these  13 regulatory issues stemming from these two incidents  14 that you described, what was Dr. Brigham's  15 involvement?  16 A With Dr. Walker?  17 Q Well, just -- I guess just generally when  18 the regulatory issues arose, what was Dr. Brigham's  19 involvement in that?  20 A Well, at one point, like I said, all of the  21 physicians' licenses were suspended. So while the  22 facilities' licenses were restored, we were seeing</p>	40	<p>1 and they paid the doctors, obviously.  2 Q And it's your understanding that Dr. Brigham  3 owned American Medical Associates?  4 A I believe he did, yes.  5 Q So other than trying to find licensed  6 doctors to take over the operations of the Maryland  7 clinics --  8 A Right.  9 Q -- did Dr. Brigham have any other role in  10 dealing with these regulatory troubles that arose that  11 you've just been talking about?  12 A I don't know that he had much of a role in  13 it other than when the physicians were suspended, I  14 think he was working with the physicians because, you  15 know, it's important when you're suspended because of  16 whatever happened in the facility, you're working --  17 that you cooperate together. So I know there was one  18 point certainly when they were suspended that Dr.  19 Walker, probably Dr. Dominy, Dr. Basco and Dr.  20 Panah -- I mentioned Dr. Panah, right?  21 Q Uh-huh.  22 A -- that they were, all were working together</p>

Conducted on January 19, 2018

41	<p>1 with Dr. Brigham and Dr. Walker to, you know, get the</p> <p>2 licenses of the physicians reinstated, get the</p> <p>3 facilities operating again.</p> <p>4 Q Okay. When you were working for Associates</p> <p>5 in OB/GYN Care, who performed sonograms on women when</p> <p>6 they would come in wanting a medical or surgical</p> <p>7 abortion?</p> <p>8 A Who by name?</p> <p>9 Q Or role, whatever.</p> <p>10 A I know Dr. Walker did sonograms absolutely.</p> <p>11 I know there were people that did sonograms. I don't</p> <p>12 know exactly who they were.</p> <p>13 Q Did any non-physician perform sonograms?</p> <p>14 A Yes.</p> <p>15 Q Okay.</p> <p>16 A Yes, I'm sure of that.</p> <p>17 Q And do you know what qualifications those</p> <p>18 individuals who actually performed sonograms had?</p> <p>19 A I do not, no.</p> <p>20 Q Do you know anything about their training to</p> <p>21 perform sonograms?</p> <p>22 A I know there was always in-office training</p>	43	<p>1 perform sonograms in the office because they received</p> <p>2 in-office training by somebody who was certified or</p> <p>3 registered?</p> <p>4 A That's correct. And ultimately the</p> <p>5 ultrasound is just taking a picture. That really</p> <p>6 means nothing. That image has to be viewed by the</p> <p>7 doctor and signed off by the doctor. An ultrasound</p> <p>8 tech, if she's certified or registered, can never say</p> <p>9 exactly what -- she can take a good image. She may</p> <p>10 know what it is certainly, but until that image is</p> <p>11 translated/viewed by the doctor, that's just an image.</p> <p>12 Q Sure.</p> <p>13 A So whomever took the picture, the doctor</p> <p>14 ultimately has to sign off on every sonogram.</p> <p>15 Q Sure. But if an ultrasound tech or</p> <p>16 whatever -- I'm calling them a tech understanding they</p> <p>17 may not actually have that licensure or regulation</p> <p>18 because --</p> <p>19 A Sure.</p> <p>20 Q -- it sounds to me like there were</p> <p>21 individuals who worked at Associates in OB/GYN Care</p> <p>22 who performed sonograms who didn't have the licensure</p>
42	<p>1 for whatever position you were, whether you were</p> <p>2 working in the laboratory, working with the physician,</p> <p>3 if you were doing sonograms. There were sonogram</p> <p>4 techs, certified sonogram techs. When you do</p> <p>5 sonograms you can be certified or registered, so</p> <p>6 registration is a level above certification. So there</p> <p>7 were certified sonogram techs who would train non --</p> <p>8 you know, I guess they were not ultrasound techs,</p> <p>9 perhaps they were medical assistants or patient care</p> <p>10 techs, whatever their duties were, but they would be</p> <p>11 trained by a sonogram tech and then they would have to</p> <p>12 sign off as to their skills, and then they would be</p> <p>13 approved to do sonograms independently.</p> <p>14 Q Okay. And when you say they would be</p> <p>15 approved after they were trained, approved by whom?</p> <p>16 A Whoever did their training, the certified or</p> <p>17 registered sono tech that trained them.</p> <p>18 Q So not approved by the states --</p> <p>19 A No, no, not by the states.</p> <p>20 Q So it would happen in your experience with</p> <p>21 Associates in OB/GYN Care that a non-registered or</p> <p>22 certified individual would nevertheless be able to</p>	44	<p>1 or registration?</p> <p>2 A That is correct.</p> <p>3 Q Right, okay. They would perform the</p> <p>4 sonogram, take an image, perhaps write something in</p> <p>5 the chart about what they thought, and then a doctor</p> <p>6 would ultimately have to sign and approve it?</p> <p>7 A That's correct.</p> <p>8 Q Okay. Earlier you mentioned that Kelly was</p> <p>9 the office manager of the Cheverly branch. Do you</p> <p>10 recall who had the title of office manager of the</p> <p>11 Frederick branch?</p> <p>12 A I believe Dr. Walker was considered the</p> <p>13 office manager of Baltimore, Silver Spring and</p> <p>14 Frederick.</p> <p>15 Q Okay.</p> <p>16 A Cheverly was of the four locations, the</p> <p>17 busiest, and had the highest patient volume so that's</p> <p>18 why they had their own dedicated office manager.</p> <p>19 Q Who do you recall were the principal</p> <p>20 employees at the Frederick location?</p> <p>21 A That's tough. Frederick I went to least</p> <p>22 because it was the furthest. I really can't --</p>

Transcript of Melissa Hope Shachnovitz  
 Conducted on January 19, 2018

45	<p>1 Q Okay.</p> <p>2 <b>A I don't know.</b></p> <p>3 Q That's fine. I'm just --</p> <p>4 <b>A I definitely went there least of all</b></p> <p>5 <b>locations.</b></p> <p>6 Q Do you know who made the decision at the</p> <p>7 Maryland clinics to allow individuals who were not</p> <p>8 either certified or registered by the state as</p> <p>9 ultrasonographers to nevertheless perform ultrasound?</p> <p>10 <b>A I do not. That predated me. I don't know</b></p> <p>11 <b>if it came from the Medical Director, from Dr. Walker.</b></p> <p>12 <b>I can't say honestly where they came from.</b></p> <p>13 Q Who was the Medical Director of the Maryland</p> <p>14 clinics?</p> <p>15 <b>A Dr. Panah.</b></p> <p>16 Q So prior to you even beginning working for</p> <p>17 Associates in OB/GYN Care, it was the practice of</p> <p>18 those clinics in Maryland that on occasion people who</p> <p>19 did not have licensure or certification to perform</p> <p>20 ultrasound nevertheless did so?</p> <p>21 <b>A That's correct.</b></p> <p>22 Q Do you recall anything about policies or</p>	47	<p>1 any type of physical exam?</p> <p>2 <b>A Depended upon the doctor.</b></p> <p>3 Q Did it include any type of blood testing or</p> <p>4 urine testing?</p> <p>5 <b>A Again, depended upon the doctor. Depended</b></p> <p>6 <b>upon the facility.</b></p> <p>7 Q So was there any set practice or policy that</p> <p>8 was kind of matter of routine with respect to</p> <p>9 follow-up care other than performing a sonogram?</p> <p>10 <b>A I mean there were certainly recommended</b></p> <p>11 <b>practices that -- set forth by the Medical Director,</b></p> <p>12 <b>but each physician kind of operated as they wanted to.</b></p> <p>13 <b>Some physicians could look at the ultrasound and</b></p> <p>14 <b>clearly say, I know the pregnancy has been terminated,</b></p> <p>15 <b>no further testing, no exam may be necessary, she's</b></p> <p>16 <b>fine, perhaps start her on birth control services.</b></p> <p>17 <b>While some may require further testing, may</b></p> <p>18 <b>also do a pelvic examination. So it's really, while</b></p> <p>19 <b>there were set recommendations, unfortunately doctors</b></p> <p>20 <b>don't always follow the recommendations.</b></p> <p>21 Q So tell me what, whether they were followed</p> <p>22 or not, what were the set recommendations with respect</p>
46	<p>1 practices at Associates in OB/GYN Care with respect to</p> <p>2 using methotrexate for medical abortions?</p> <p>3 <b>A I certainly know we used it. It was given,</b></p> <p>4 <b>you -- policy of how we would use it, is that what</b></p> <p>5 <b>you're asking?</b></p> <p>6 Q Yeah, yeah.</p> <p>7 <b>A I believe it was available up to patients of</b></p> <p>8 <b>nine weeks, if the pregnancy was nine weeks or less.</b></p> <p>9 <b>It was given orally in a drink form or through</b></p> <p>10 <b>injection. There was a chart that you would have to</b></p> <p>11 <b>translate the patient's weight to get the proper dose.</b></p> <p>12 <b>They were then given misoprostol, I believe, five to</b></p> <p>13 <b>eight days later. They would take misoprostol at</b></p> <p>14 <b>home, that's what would induce the actual miscarriage,</b></p> <p>15 <b>and then I believe they were required to return</b></p> <p>16 <b>somewhere between two to three weeks later for their</b></p> <p>17 <b>follow-up examination.</b></p> <p>18 Q When you say for a follow-up examination,</p> <p>19 what are you talking about?</p> <p>20 <b>A An ultrasound to confirm if the pregnancy is</b></p> <p>21 <b>terminated.</b></p> <p>22 Q Did the two- to three-week follow-up include</p>	48	<p>1 to follow-up care after a medical abortion?</p> <p>2 <b>A The ultrasound, the pelvic examination, and</b></p> <p>3 <b>also pregnancy testing potentially depending upon the</b></p> <p>4 <b>other findings.</b></p> <p>5 Q And do you know who, what person or persons</p> <p>6 instituted those set recommendations?</p> <p>7 <b>A I'm going to assume Dr. Panah again.</b></p> <p>8 <b>That -- it kind of predated me, so I would have to</b></p> <p>9 <b>assume him.</b></p> <p>10 Q While you were working for Associates in</p> <p>11 OB/GYN Care, were you ever aware as to whether the</p> <p>12 clinic was using misoprostol or RU486 for medical</p> <p>13 abortions?</p> <p>14 <b>A They were not.</b></p> <p>15 Q Ever?</p> <p>16 <b>A No, not in my two years there, they did not.</b></p> <p>17 Q Do you know why?</p> <p>18 <b>A I do not, no.</b></p> <p>19 Q Was Mifepristone used at any of the other</p> <p>20 clinics that you are aware of, the ones we've talked</p> <p>21 about earlier in Virginia or New Jersey?</p> <p>22 <b>A Not to my knowledge, no.</b></p>

Conducted on January 19, 2018

49	<p>1 Q You have no idea why that wasn't used?</p> <p>2 <b>A Some doctors feel that methotrexate is the</b></p> <p>3 <b>safer route because if the pregnancy is outside of the</b></p> <p>4 <b>uterus, a pregnancy can implant in the tube, called an</b></p> <p>5 <b>ectopic pregnancy. In that case, methotrexate would</b></p> <p>6 <b>successfully terminate that pregnancy. You don't run</b></p> <p>7 <b>the risk of failure and the patient's tube rupturing.</b></p> <p>8 <b>Mifepristone, which is commonly in the U.S.</b></p> <p>9 <b>under Mifeprex, that would only terminate an</b></p> <p>10 <b>intrauterine pregnancy. So while it may have a higher</b></p> <p>11 <b>success rate, some doctors see methotrexate as a</b></p> <p>12 <b>higher advantage. It would work even if the pregnancy</b></p> <p>13 <b>were not in the uterus.</b></p> <p>14 Q Okay. But did not Associates in OB/GYN Care</p> <p>15 have a policy or practice of doing an ultrasound--</p> <p>16 <b>A Yes.</b></p> <p>17 Q -- before the medical abortion?</p> <p>18 <b>A I'm sorry. Yes.</b></p> <p>19 Q Okay. So they would presumably know whether</p> <p>20 there was an intrauterine or extrauterine pregnancy</p> <p>21 before choosing the drug to effectuate the medical</p> <p>22 abortion?</p>	51	<p>1 <b>A No, not all. I always recall honestly</b></p> <p>2 <b>hearing positive feedback about Dr. Dominy.</b></p> <p>3 Q Did you interact with Dr. Dominy at all?</p> <p>4 <b>A Yeah, a few times, absolutely, and her</b></p> <p>5 <b>husband Hal more often.</b></p> <p>6 Q How so?</p> <p>7 <b>A He was her spokesperson, so--</b></p> <p>8 Q What do you mean?</p> <p>9 <b>A You know, normally a doctor would call you,</b></p> <p>10 <b>whether it's scheduling things or I want this</b></p> <p>11 <b>supplied, anything. It rarely -- I shouldn't say</b></p> <p>12 <b>rarely. It almost never came from Dr. Dominy. Her</b></p> <p>13 <b>spokesperson, Hal, her husband, always handled her.</b></p> <p>14 <b>So I -- while I would see her in office on occasion, I</b></p> <p>15 <b>rarely interacted with her outside of the office</b></p> <p>16 <b>because I would interact with Hal, her husband.</b></p> <p>17 Q Was Hal a physician?</p> <p>18 <b>A No.</b></p> <p>19 Q So he would just call and say what?</p> <p>20 <b>A I guess just to save her the trouble. You</b></p> <p>21 <b>know, Dr. Dominy wants you to get this, you know,</b></p> <p>22 <b>any -- name any supply. She wants that for the</b></p>
50	<p>1 <b>A Absolutely they should, certainly.</b></p> <p>2 Q Okay. Tell me what you -- well, I'm sorry.</p> <p>3 Other than the patient who you've already told me</p> <p>4 about who passed away at the Baltimore clinic --</p> <p>5 <b>A Correct.</b></p> <p>6 Q -- are you aware of any other issues</p> <p>7 involving Dr. Dominy's care while you were employed</p> <p>8 with Associates in OB/GYN Care?</p> <p>9 <b>A I'm not sure if the patient that we're here</b></p> <p>10 <b>about today was her patient or not. I believe she's</b></p> <p>11 <b>hers --</b></p> <p>12 Q She is. She is.</p> <p>13 <b>A -- or Dr. Basco.</b></p> <p>14 Q I'm happy to tell you that she is.</p> <p>15 <b>A Okay. I thought that she was.</b></p> <p>16 Q Let's set her aside for a moment. Besides</p> <p>17 Ms. O'Connell and the woman who you've told me about</p> <p>18 who passed away in Baltimore--</p> <p>19 <b>A Right.</b></p> <p>20 Q -- are you aware of any other issues</p> <p>21 involving Dr. Dominy's care while she was affiliated</p> <p>22 with Associates in OB/GYN Care?</p>	52	<p>1 <b>office, she needs this day off, she thinks this</b></p> <p>2 <b>employee, she works too slow, we need more staff in</b></p> <p>3 <b>the location. Whatever complaint may arise or</b></p> <p>4 <b>anything that needed to be communicated usually would</b></p> <p>5 <b>come from Hal.</b></p> <p>6 Q Did you have any understanding as to why?</p> <p>7 <b>A No. I often questioned. It's a very odd,</b></p> <p>8 <b>odd situation.</b></p> <p>9 Q Okay. So what if anything do you know about</p> <p>10 Christy O'Connell and what happened with her</p> <p>11 experience at Associates in OB/GYN Care?</p> <p>12 <b>A From what I recall, she had a medical</b></p> <p>13 <b>procedure, methotrexate procedure that was diagnosed</b></p> <p>14 <b>as being successfully terminated. I don't know if</b></p> <p>15 <b>Dr. Dominy would have started her on birth control or</b></p> <p>16 <b>not, but at some point it was determined that it was</b></p> <p>17 <b>not successfully terminated and it was a continuing</b></p> <p>18 <b>pregnancy, and she delivered a live premature birth.</b></p> <p>19 <b>I know at one point I had gotten a letter</b></p> <p>20 <b>from somebody, I don't know if it was yourself or</b></p> <p>21 <b>somebody else, that was asking for the original</b></p> <p>22 <b>ultrasound records. I recall corresponding with</b></p>

Transcript of Melissa Hope Shachnovitz  
 Conducted on January 19, 2018

53	55
<p>1 whomever that was -- again, I'm going back four years          2 or so -- I don't recall who it was, just saying that I          3 couldn't provide the actual ultrasound as we needed to          4 retain the original. I provided copies and that was          5 kind of about it. You know, I left the company, and          6 here I am now.          7 Q Never heard about it since?          8 A No.          9 Q How did you become --          10 A I do -- I admit, though, once I spoke to          11 you, I did of course look it up online and saw some          12 newspaper articles and all and I realized that -- the          13 case looked like it settled to me so I didn't even          14 really understand --          15 Q You mean once you and I spoke about          16 scheduling today you looked it up?          17 A Yes, yes, exactly, to see -- but again, from          18 what I -- it looked like a case that had already          19 settled. I didn't even know where we were at on this,          20 but ...          21 Q So when do you think you learned that Ms.          22 O'Connell's attempted pregnancy termination wasn't</p>	<p>1 A I perhaps -- I think when I left I might          2 have. There was somebody named Kiersi that kind of          3 took over my role, so I think I kind of said like this          4 is something that's pending, this is what's going on.          5 So I kind of told Kiersi what I knew at that point. I          6 don't think anything else, though.          7 Q Okay. Did you speak to Dr. Brigham at all          8 about Ms. O'Connell's case? And when I say case, I          9 don't mean the actual lawsuit, I mean what happened to          10 her at Associates in OB/GYN Care.          11 A Right. Exactly.          12 Q Her experience.          13 A Not that I recall, no.          14 Q What is your understanding as to what          15 relationship Dr. Panah had with Dr. Brigham?          16 A I believe Dr. Panah reported to him. I          17 don't know if he was an employee, an independent          18 contractor of AMA. I knew he was a Medical Director          19 for Associates. I don't know much about his          20 relationship with Dr. Brigham or AMA, though.          21 Q Is it what you know that Dr. Panah was the          22 Medical Director for Associates?</p>
54	56
<p>1 successful? Do you think you knew that before I          2 contacted you, or is that something you learned after?          3 A Oh, yes, yes, because I recall getting          4 correspondence while I was still in the office          5 working, so sometime prior to, or maybe sometime in          6 2014, or '13, so -- I know I was still there when I          7 found out that it was unsuccessful.          8 Q And how did you find out that it was          9 unsuccessful? Who told you that, or how did you learn          10 that?          11 A I would imagine maybe the correspondence          12 that I received that was requesting her ultrasound.          13 Q Do you recall anybody in the Associates in          14 OB/GYN Care offices or that you worked with in          15 relation to their operations talking about Ms.          16 O'Connell's case?          17 A No.          18 Q Did you ever speak to Dr. Dominy about it?          19 A I don't believe I did, no.          20 Q Do you recall ever speaking to anybody at          21 Associates in OB/GYN Care about Ms. O'Connell at the          22 time that you were still working there?</p>	<p>1 A Right.          2 Q You do not know what relationship Dr. Panah          3 may or may not have had with AMA?          4 A Right, correct. I know he worked for them.          5 Q Okay.          6 A I don't know in what other capacity other          7 than as a treating physician or the Medical Director          8 for Associates.          9 Q Do you know who hired Dr. Panah to be the          10 Medical Director for Associates?          11 A I do not because again, that predates when I          12 came in 2012.          13 Q Was Dr. Panah the Medical Director of          14 Associates the entire time you worked there?          15 A Yes.          16 Q Do you know how long he had been the Medical          17 Director before you went to work there?          18 A I'm going to guess a few years. It wasn't,          19 it wasn't a real long time.          20 Q Uh-huh.          21 A So I would guess a few years.          22 Q Was there a policy at Associates not to use</p>

Conducted on January 19, 2018

<p style="text-align: right;">57</p> <p>1 Mifepristone as a pregnancy termination agent?</p> <p>2 <b>A Not to my knowledge. There was not a policy</b></p> <p>3 <b>not to use it, but it was not offered, nor was it</b></p> <p>4 <b>stocked in the office, so essentially we couldn't use</b></p> <p>5 <b>it.</b></p> <p>6 Q Right. And do you know whose decision that</p> <p>7 was not to stock it or use it?</p> <p>8 <b>A Again, I have to assume the Medical</b></p> <p>9 <b>Director. There was a list of supplies that, you</b></p> <p>10 <b>know, we had. These were acceptable supplies. This</b></p> <p>11 <b>is what you would order from, and Mifepristone was not</b></p> <p>12 <b>on there. So who originated that supply list, I have</b></p> <p>13 <b>no idea.</b></p> <p>14 Q When patients would come in for a medical</p> <p>15 abortion, or I presume a surgical abortion, they had</p> <p>16 to sign an Informed Consent document, correct?</p> <p>17 <b>A Yes, they did.</b></p> <p>18 Q Do you know who drafted that document?</p> <p>19 <b>A I do not. Those documents, again, were in</b></p> <p>20 <b>place, I would imagine, long before me.</b></p> <p>21 Q So they were standard forms that were</p> <p>22 available when you started, the same forms the entire</p>	<p style="text-align: right;">59</p> <p>1 <b>A Just kind of reviewing paperwork. He would</b></p> <p>2 <b>look at physicians' charts every now and again, just</b></p> <p>3 <b>do kind of like peer review to make sure their charts</b></p> <p>4 <b>were in order; patient volume, see if there were any</b></p> <p>5 <b>staffing issues, human resource issues, physical plant</b></p> <p>6 <b>issues, you know, anything that would arise that</b></p> <p>7 <b>required attention beyond --</b></p> <p>8 Q Okay. And how about Dr. Walker, did you</p> <p>9 regularly interact with her?</p> <p>10 <b>A Yes.</b></p> <p>11 Q As it related --</p> <p>12 <b>A More than anybody else I interacted with Dr.</b></p> <p>13 <b>Walker.</b></p> <p>14 Q Okay. So if you compared your interactions</p> <p>15 with Dr. Dr. Walker to your interactions with Dr.</p> <p>16 Panah, would you say you worked with Dr. Walker more?</p> <p>17 <b>A Oh, much more, yes.</b></p> <p>18 Q Which of the two was more involved in the</p> <p>19 day-to-day operations of the Maryland clinics?</p> <p>20 <b>A Dr. Walker.</b></p> <p>21 Q And it sounds like Dr. Panah, though, was</p> <p>22 still pretty regularly and intimately involved?</p>
<p style="text-align: right;">58</p> <p>1 time you worked there?</p> <p>2 <b>A Yes, it was.</b></p> <p>3 Q You don't recall any times that there was</p> <p>4 ever a revision or updating or changing of any</p> <p>5 Informed Consent forms?</p> <p>6 <b>A Not during my time there, no.</b></p> <p>7 Q How about educational materials, like just</p> <p>8 generic educational materials about abortion services</p> <p>9 or discharge instructions that were given, do you know</p> <p>10 who drafted any of those materials?</p> <p>11 <b>A I don't really. All the forms were already</b></p> <p>12 <b>in place. I mean there were various brochures in the</b></p> <p>13 <b>waiting room that had, you know, different abortion</b></p> <p>14 <b>services, counseling services out there, birth control</b></p> <p>15 <b>services. I don't even know where those brochures</b></p> <p>16 <b>would come from, though.</b></p> <p>17 Q Okay. What interaction did you have with</p> <p>18 Dr. Panah while he was the Medical Director of</p> <p>19 Associates?</p> <p>20 <b>A I worked with Dr. Panah relatively often.</b></p> <p>21 Q Like in what capacity would you work with</p> <p>22 him?</p>	<p style="text-align: right;">60</p> <p>1 <b>A Absolutely. Yes. He was there often and he</b></p> <p>2 <b>was in each facility, but Dr. Walker was in the</b></p> <p>3 <b>facilities, between the four of them, five days a</b></p> <p>4 <b>week. Dr. Panah I don't think would be there five</b></p> <p>5 <b>days a week because there were other physicians also.</b></p> <p>6 Q I'm trying to understand sort of the</p> <p>7 different roles that those two doctors played in</p> <p>8 relation to the Maryland clinics. So Dr. Panah was</p> <p>9 the Medical Director. Dr. Walker was the -- what was</p> <p>10 her title?</p> <p>11 <b>A District manager.</b></p> <p>12 Q District manager.</p> <p>13 <b>A She was -- where Dr. Panah was in charge of</b></p> <p>14 <b>the doctors and the medical -- anything medical,</b></p> <p>15 <b>Dr. Walker was more involved with the daily day-to-day</b></p> <p>16 <b>running of the facilities; staffing, supplies, all</b></p> <p>17 <b>those things.</b></p> <p>18 Q Okay. So I'm not trying to put words in</p> <p>19 your mouth, I'm just trying to understand, so if I</p> <p>20 misspeak, just please correct me.</p> <p>21 Dr. Walker, the district manager, was</p> <p>22 responsible for sort of logistics, daily operations,</p>



Conducted on January 19, 2018

<p style="text-align: right;">61</p> <p>1 staffing issues, making sure the clinics ran smoothly</p> <p>2 from a business standpoint?</p> <p>3 <b>A That's correct.</b></p> <p>4 Q And Dr. Panah, as the Medical Director, was</p> <p>5 more responsible for supervising and overseeing the</p> <p>6 physicians and actually making medical decisions about</p> <p>7 how to treat people?</p> <p>8 <b>A That's correct.</b></p> <p>9 Q Okay. I take it Dr. Panah was aware of the</p> <p>10 practice that was going on at Associates in OB/GYN</p> <p>11 Care, that there were individuals who were performing</p> <p>12 ultrasound who were not certified or registered to do</p> <p>13 that, correct?</p> <p>14 <b>A Yes, I'm sure he was aware.</b></p> <p>15 Q I'm sure Dr. Panah was aware that the</p> <p>16 clinics were not using Mifepristone as a medical</p> <p>17 abortion agent, correct?</p> <p>18 <b>A I am sure he was aware, yes.</b></p> <p>19 Q Did Dr. Panah actually see patients?</p> <p>20 <b>A Yes.</b></p> <p>21 Q Since you left Associates, did you have at</p> <p>22 any point in time any interaction with Dr. Panah?</p>	<p style="text-align: right;">63</p> <p>1 <b>A Dr. Walker was not a treating physician. I</b></p> <p>2 <b>don't know if you -- we referred to her as Dr. Walker</b></p> <p>3 <b>out of courtesy because she went to school as a</b></p> <p>4 <b>physician but she was not a licensed physician, so --</b></p> <p>5 Q Did Dr. Walker ever see patients?</p> <p>6 <b>A No, not in any capacity -- as any other</b></p> <p>7 <b>medical assistant or anything else, whether it be sona</b></p> <p>8 <b>or doing lab testing. She did not operate as a</b></p> <p>9 <b>physician, no.</b></p> <p>10 Q I'm sorry, I just didn't understand what you</p> <p>11 said. Did she perform sonograms?</p> <p>12 <b>A She did perform sonograms. She would have</b></p> <p>13 <b>performed medical assistant work. For example, she</b></p> <p>14 <b>would do laboratory testing, stick their finger, find</b></p> <p>15 <b>out what -- the blood type, vital signs. She</b></p> <p>16 <b>essentially operated as a medical assistant.</b></p> <p>17 Q Okay. She wouldn't perform surgical</p> <p>18 abortions?</p> <p>19 <b>A No, not at all. No.</b></p> <p>20 Q Would she ever be the sort of physician who</p> <p>21 would meet with a patient and provide them advice and</p> <p>22 consultation about a medical abortion?</p>
<p style="text-align: right;">62</p> <p>1 <b>A I found out when I spoke to you that he</b></p> <p>2 <b>wasn't here anymore.</b></p> <p>3 <b>No, not at all.</b></p> <p>4 Q How about -- I don't know if he's not, or</p> <p>5 assumed not to be. Mr. Greaney is going to have to</p> <p>6 fill us in.</p> <p>7 <b>A Oh, Dr. Panah, is he -- you mean soon or not</b></p> <p>8 <b>to be. I thought he was deceased. I'm sorry.</b></p> <p>9 MS. MALARKEY: Off the record.</p> <p>10 (A discussion was held off the record.)</p> <p>11 BY MS. MALARKEY:</p> <p>12 Q Just piggybacking on a comment you made off</p> <p>13 the record. How was Dr. Panah when he was a Medical</p> <p>14 Director of Associates?</p> <p>15 <b>A He was fine.</b></p> <p>16 Q He was old?</p> <p>17 <b>A He was old.</b></p> <p>18 Q But fine?</p> <p>19 <b>A He was fine. He had his faculties. He was</b></p> <p>20 <b>kind, he was competent with patients, but he was old,</b></p> <p>21 <b>absolutely.</b></p> <p>22 Q How about Dr. Walker?</p>	<p style="text-align: right;">64</p> <p>1 <b>A I can see that she would certainly meet with</b></p> <p>2 <b>patients. I don't think she would represent herself</b></p> <p>3 <b>as a physician, though.</b></p> <p>4 Q Okay.</p> <p>5 <b>A So even a medical assistant honestly could</b></p> <p>6 <b>meet with patients and explain the procedure, go over</b></p> <p>7 <b>any questions, witness any forms that they signed.</b></p> <p>8 <b>But, you know, they wouldn't represent themselves as a</b></p> <p>9 <b>physician either.</b></p> <p>10 Q And Dr. Walker was already acting as the</p> <p>11 district manager for Associates when you started in</p> <p>12 2012?</p> <p>13 <b>A That's correct.</b></p> <p>14 Q Who did you understand to be Dr. Walker's</p> <p>15 boss, if anybody?</p> <p>16 <b>A I don't really know. I always heard that</b></p> <p>17 <b>she owned the entity. I don't -- I don't know.</b></p> <p>18 Q How about Dr. Panah, who was his boss, if</p> <p>19 anybody?</p> <p>20 <b>A Dr. Brigham, I believe.</b></p> <p>21 Q Do you have any idea how it came about that</p> <p>22 Dr. Brigham operating as this entity called AMA came</p>

Conducted on January 19, 2018

65	<p>1 to have a contract with Dr. Walker and Associates in</p> <p>2 OB/GYN Care to staff the Maryland clinics?</p> <p>3 <b>A Again, I don't. That was before me.</b></p> <p>4 Q Have you ever heard anything about Dr.</p> <p>5 Brigham's relationship with the Maryland clinics</p> <p>6 before Dr. Walker was involved?</p> <p>7 <b>A Only from, again, things that I read before</b></p> <p>8 <b>I joined the group, was way predating my AMA -- my</b></p> <p>9 <b>Associates time is I know about Dr. Brigham's issues</b></p> <p>10 <b>in Maryland when, I believe he had an office, it was</b></p> <p>11 <b>in Elkton, and you know, that -- there's a lot of</b></p> <p>12 <b>history there, which I would imagine you're aware of.</b></p> <p>13 Q I am. I am.</p> <p>14 <b>A I think that -- I don't know -- I think that</b></p> <p>15 <b>even predated Dr. Walker's time, I'm not sure. I'm</b></p> <p>16 <b>not sure exactly when she joined. I know she was</b></p> <p>17 <b>there when I came.</b></p> <p>18 Q So was it your understanding that Dr.</p> <p>19 Brigham was not licensed to practice medicine in</p> <p>20 Maryland?</p> <p>21 <b>A That's correct.</b></p> <p>22 Q Okay.</p>	67	<p>1 <b>suspended the doctors. And then they suspend Dr.</b></p> <p>2 <b>Basco, the facilities got suspended again. It was</b></p> <p>3 <b>always a battle. There was always just regulatory</b></p> <p>4 <b>trouble there.</b></p> <p>5 <b>It was a distance from my house. There was</b></p> <p>6 <b>four locations. So many factors. Myson's father had</b></p> <p>7 <b>passed away in 2012 right when I joined there. And it</b></p> <p>8 <b>was just a lot of factors that I just couldn't do it</b></p> <p>9 <b>anymore.</b></p> <p>10 Q Did you keep in touch with Dr. Brigham after</p> <p>11 you left?</p> <p>12 <b>A I met with him and actually Kiersi, I told</b></p> <p>13 <b>you, the person that took my job, maybe six months</b></p> <p>14 <b>after I left. You know, she had some questions. I</b></p> <p>15 <b>remember I met them at a diner somewhere.</b></p> <p>16 Q Just to sort of continue the transition</p> <p>17 process?</p> <p>18 <b>A Exactly.</b></p> <p>19 Q Where did Kiersi live?</p> <p>20 <b>A I forget if it was Delaware or New Jersey or</b></p> <p>21 <b>maybe somewhere in between. Not in Maryland, no.</b></p> <p>22 Q Not --</p>
66	<p>1 <b>A I believe he was not.</b></p> <p>2 Q You think Dr. Brigham had a preexisting</p> <p>3 relationship with Dr. Walker?</p> <p>4 <b>A Correct.</b></p> <p>5 Q And somehow Dr. Walker came to be the</p> <p>6 district manager for the four clinics that were</p> <p>7 operating under the name Associates in OB/GYN Care?</p> <p>8 <b>A Correct.</b></p> <p>9 Q But you don't know how?</p> <p>10 <b>A No, I do not.</b></p> <p>11 Q Do you know who was running the Maryland</p> <p>12 clinics before Dr. Walker?</p> <p>13 <b>A I do not.</b></p> <p>14 Q So why did you leave Associates in OB/GYN</p> <p>15 Care in 2014?</p> <p>16 <b>A You know, my time there was brief, but it</b></p> <p>17 <b>was filled with all sorts of regulatory trouble. And</b></p> <p>18 <b>as I said, I've been in this business for 20 plus</b></p> <p>19 <b>years, and I've never had any regulatory issues at</b></p> <p>20 <b>all. There was regulatory issue after regulatory</b></p> <p>21 <b>issue, so it was a battle. The travel, the battle</b></p> <p>22 <b>of -- things would finally, we won this, and then they</b></p>	68	<p>1 Are you -- other than American Medical</p> <p>2 Associates, are you aware of any other business</p> <p>3 entities that Dr. Brigham owns?</p> <p>4 <b>A The Virginia -- I think it's called Virginia</b></p> <p>5 <b>Health Care.</b></p> <p>6 Q Okay.</p> <p>7 <b>A Those offices in Virginia.</b></p> <p>8 Q Any others?</p> <p>9 <b>A And New Jersey is -- he had the New Jersey</b></p> <p>10 <b>offices, American Women Services.</b></p> <p>11 Q American Women Services own the clinics in</p> <p>12 New Jersey?</p> <p>13 <b>A I believe, yeah.</b></p> <p>14 Q Who owned Health Care Delivery Corp.?</p> <p>15 <b>A I don't know. I don't know who technically</b></p> <p>16 <b>owned that honestly.</b></p> <p>17 Q Nancy Lewis or Luke who you identified</p> <p>18 earlier as the CFO of Associates in OB/GYN Care --</p> <p>19 <b>A Correct.</b></p> <p>20 Q -- and Health Care Delivery Corp. --</p> <p>21 <b>A Correct.</b></p> <p>22 Q -- where did she operate out of physically?</p>

Conducted on January 19, 2018

69	<p>1 <b>A She was mostly home-based, actually.</b></p> <p>2 Q Where did she live?</p> <p>3 <b>A In New Jersey.</b></p> <p>4 Q In Voorhees?</p> <p>5 <b>A I don't know where she -- I've never been to</b></p> <p>6 <b>her house. I don't know, but -- it was often through</b></p> <p>7 <b>email correspondence or telephone.</b></p> <p>8 Q But you think she lived in New Jersey?</p> <p>9 <b>A Yeah, I'm relatively -- a New Jersey area</b></p> <p>10 <b>code, I recall that.</b></p> <p>11 Q So you're sure it's New Jersey, you just</p> <p>12 don't know where?</p> <p>13 <b>A Exactly.</b></p> <p>14 Q Do you know where Dr. Panah lived?</p> <p>15 <b>A Maryland. Gaithersburg, I believe.</b></p> <p>16 Q How about Doctors Basco and Rose?</p> <p>17 <b>A Basco lived in Maryland; I can't recall what</b></p> <p>18 <b>city. Dr. Rose, I believe, right around the time I</b></p> <p>19 <b>left, or right before I left, somewhere in that two-</b></p> <p>20 <b>year period, I believe moved to Florida.</b></p> <p>21 Q So explain this to me if you can. In 2012</p> <p>22 when you are getting ready to leave Gynecologic</p>	71	<p>1 <b>believe it was his Hamilton location in New Jersey as</b></p> <p>2 <b>an office manager. Then he said about this</b></p> <p>3 <b>opportunity in Maryland, in Associates. And we also</b></p> <p>4 <b>decided at that time that he had this opportunity for</b></p> <p>5 <b>consulting services in New Jersey because when I first</b></p> <p>6 <b>joined the organization there, there was nothing in</b></p> <p>7 <b>New Jersey that was accredited. So where he had a</b></p> <p>8 <b>need for some consulting there, it certainly wouldn't</b></p> <p>9 <b>have been a full-time job for me, but there was</b></p> <p>10 <b>full-time available as administrator in Maryland.</b></p> <p>11 Q And how did he describe it when as you say</p> <p>12 he said, hey, there's this opportunity as -- to use</p> <p>13 your word -- in Maryland --</p> <p>14 <b>A Right.</b></p> <p>15 Q -- what did he say the opportunity was?</p> <p>16 <b>A I can't say exactly, but I would imagine</b></p> <p>17 <b>administrator of four licensed facilities.</b></p> <p>18 Q Did he give you a description or</p> <p>19 understanding of why he was the one who was trying to</p> <p>20 fill a role for these clinics in Maryland?</p> <p>21 <b>A Not really. Nor did I ask, honestly.</b></p> <p>22 Q Did you understand why Dr. Brigham, this</p>
70	<p>1 Surgical Consulting because they're shutting down</p> <p>2 their operations, Dr. Klein introduces you to Dr.</p> <p>3 Brigham, right?</p> <p>4 <b>A Well, Dr. Taylor. He was a physician that</b></p> <p>5 <b>worked for me.</b></p> <p>6 Q Okay.</p> <p>7 <b>A He's the one who said, you know, you're</b></p> <p>8 <b>good. I'm going to tell Dr. Brigham to call you. You</b></p> <p>9 <b>should work for him, this, that, so ...</b></p> <p>10 Q Whoever it is, Dr. Taylor makes the</p> <p>11 introduction between you and Dr. Brigham?</p> <p>12 <b>A Correct.</b></p> <p>13 Q Who you had heard of?</p> <p>14 <b>A Right.</b></p> <p>15 Q And you meet with Dr. Brigham -- I can't</p> <p>16 remember if you said in person or on the telephone --</p> <p>17 <b>A In person, yes.</b></p> <p>18 Q -- and what does he say to you about, come</p> <p>19 work for me, I want you to do X?</p> <p>20 <b>A Well, he was telling me about various</b></p> <p>21 <b>opportunities, you know. Like I said, one person that</b></p> <p>22 <b>interviewed with me actually took an opportunity in, I</b></p>	72	<p>1 doctor who's operating clinics in New Jersey and</p> <p>2 Virginia, was involved in clinics in Maryland?</p> <p>3 <b>A Once I joined and I saw that the physicians</b></p> <p>4 <b>are employed by them, I imagined there was some kind</b></p> <p>5 <b>of, obviously had financial incentives in keeping</b></p> <p>6 <b>those offices, you know, licensed and make sure that</b></p> <p>7 <b>they remained open.</b></p> <p>8 Q So your paychecks came from Health Care</p> <p>9 Delivery Corp. even though, signed by Nancy who was</p> <p>10 the CFO of that entity, you were hired by Dr. Brigham?</p> <p>11 <b>A Well, I met with Dr. Brigham the first time,</b></p> <p>12 <b>and then I met with Dr. Walker. After I met with Dr.</b></p> <p>13 <b>Walker is when I was eventually hired. I met with Dr.</b></p> <p>14 <b>Brigham with this other employee that left Dr. Klein's</b></p> <p>15 <b>practice with me. We met together with him and were</b></p> <p>16 <b>kind of told of opportunities that were out there.</b></p> <p>17 <b>And then after I met with Dr. Walker is when I decided</b></p> <p>18 <b>to take the position.</b></p> <p>19 Q So who was your boss?</p> <p>20 <b>A I would say Dr. Walker, honestly. I mean we</b></p> <p>21 <b>kind of worked together. I don't know if anybody was</b></p> <p>22 <b>anybody's boss. We had different tasks. Where she</b></p>

Conducted on January 19, 2018



73	<p>1 <b>did the kind of day-to-day, I did the regulatory.</b></p> <p>2 Q Who was Dr. Walker's boss?</p> <p>3 A <b>I don't really think Dr. Walker -- I thought</b></p> <p>4 <b>that she owned the facilities.</b></p> <p>5 Q Okay. Earlier we talked about the call</p> <p>6 center and you said if it was after hours or on the</p> <p>7 weekends and a woman in Maryland would call the local</p> <p>8 Maryland number for Associates it would ring to the</p> <p>9 call center in New Jersey. Do you remember that?</p> <p>10 A <b>Correct. Yes.</b></p> <p>11 Q Do you know anything about how, let's say a</p> <p>12 woman did that. It was a Saturday and she called the</p> <p>13 Maryland number for Associates in OB/GYN Care. It</p> <p>14 rang in New Jersey. Someone at the call center</p> <p>15 answered her call. Could they actually schedule her</p> <p>16 to come for an appointment in Maryland?</p> <p>17 A <b>Yes, I believe they could, certainly.</b></p> <p>18 Q And do you know how that information at the</p> <p>19 call center in New Jersey was transmitted or</p> <p>20 communicated to the local Maryland clinic where the</p> <p>21 lady was going to have her appointment?</p> <p>22 A <b>There were -- well, depending. Some offices</b></p>	75	<p>1 <b>if they ever then took it to the next level, Superior</b></p> <p>2 <b>Court. But my part with the licenses being revoked,</b></p> <p>3 <b>that happened like just a few weeks, literally, before</b></p> <p>4 <b>I left, and then I don't know what happened after</b></p> <p>5 <b>that.</b></p> <p>6 Q So there never came a time after you left</p> <p>7 that you had to come back or testify and be involved</p> <p>8 in the Maryland clinic licensure proceedings?</p> <p>9 A <b>There was not, no.</b></p> <p>10 Q And at the time that you left, what was the</p> <p>11 status of the Maryland clinics licensure?</p> <p>12 A <b>Again, literally, I believe just a few weeks</b></p> <p>13 <b>before I left they were revoked where they had been</b></p> <p>14 <b>suspended.</b></p> <p>15 Q So --</p> <p>16 A <b>So offices were operating doing only</b></p> <p>17 <b>nonsurgical procedures.</b></p> <p>18 Q Okay. Bear with me. I think we're almost</p> <p>19 done, but I just want to gather my thoughts for a</p> <p>20 second.</p> <p>21 During the time that we've been talking</p> <p>22 about, or at least the time that you were employed at</p>
74	<p>1 <b>had computers, some didn't. If you had a computer,</b></p> <p>2 <b>you could easily access your schedule there and you</b></p> <p>3 <b>wouldn't necessarily see who scheduled the</b></p> <p>4 <b>appointment, if it was scheduled by a staff personnel,</b></p> <p>5 <b>if they called after hours and scheduled with the call</b></p> <p>6 <b>center, but you'd have access to the schedule. If not</b></p> <p>7 <b>it was always on your fax machine.</b></p> <p>8 Q So was it the case, then, that the computer</p> <p>9 system that was available in the Maryland clinics was</p> <p>10 the same computer system that was in place in</p> <p>11 New Jersey?</p> <p>12 A <b>I think it was sort of the, like an online</b></p> <p>13 <b>software for appointment scheduling so that could be</b></p> <p>14 <b>assessed anywhere, be it from your home, from --</b></p> <p>15 Q I see. Okay. You mentioned earlier having</p> <p>16 to meet with lawyers and testifying in Maryland about</p> <p>17 the closure and reopening of the Maryland facilities.</p> <p>18 Did any of that happen after you left working there in</p> <p>19 2014, or had that all concluded?</p> <p>20 A <b>No, that had all concluded, yeah.</b></p> <p>21 Q And at the time --</p> <p>22 A <b>Well, my part had concluded. I don't know</b></p>	76	<p>1 Associates in OB/GYN Care, do you know where Dr.</p> <p>2 Brigham lived?</p> <p>3 A <b>New Jersey, I believe. I believe. I mean</b></p> <p>4 <b>I -- I can't say that definitively. I don't know that</b></p> <p>5 <b>I ever asked. I'd never been to his house. But I</b></p> <p>6 <b>believed he lived in New Jersey.</b></p> <p>7 Q Were you ever aware of him living outside</p> <p>8 the State of New Jersey at any time?</p> <p>9 A <b>Not that I know of, no.</b></p> <p>10 Q Now we've had a chance to talk for a while.</p> <p>11 I just want to go back to the issue of the people that</p> <p>12 you recall who worked in Maryland. You've given me</p> <p>13 last names for physicians, and a bunch of first names</p> <p>14 for staff. But do you recall any last names for any</p> <p>15 staff people who worked in Maryland?</p> <p>16 A <b>Let's see. I only kind of knew -- or Dr.</b></p> <p>17 <b>Walker did the hiring and all of that. I only knew</b></p> <p>18 <b>them, and when I visited, I was checking all the</b></p> <p>19 <b>regulatory stuff and working with them so I only</b></p> <p>20 <b>really knew them by first names. I can't say, other</b></p> <p>21 <b>than I think Crystal might have began with a K I feel</b></p> <p>22 <b>like, I really don't know.</b></p>

Transcript of Melissa Hope Shachnovitz  
Conducted on January 19, 2018

77

1 Q Okay. Were there employee files kept at the  
2 Maryland clinics?  
3 A I'm sure.  
4 Q Personnel records?  
5 A Yeah. I would imagine, yeah. Yeah, there  
6 would have to be employee files.  
7 Q Do you know Nancy Lewis or Luke's  
8 relationship to Dr. Brigham?  
9 A I don't.  
10 MS. MALARKEY: Okay. I think that those are  
11 all the questions that I have for you. We may need  
12 you back at sometime when we have a trial; we may not,  
13 but thank you for your cooperation. I appreciate it.  
14 We'll do our best to make sure that it's as convenient  
15 for you as possible under the circumstances.  
16 THE WITNESS: Okay.  
17 MR. GREANEY: I have no questions.  
18 (Off the record at 12:15 p.m.)  
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1 CERTIFICATE OF SHORTHAND REPORTER-NOTARY PUBLIC  
2 I, Dawn M. Hart, the officer before whom the  
3 foregoing deposition was taken, do hereby certify that  
4 the foregoing transcript is a true and  
5 correct record of the testimony given; that said  
6 testimony was taken by me stenographically and  
7 thereafter reduced to typewriting under my direction;  
8 that reading and signing was not requested; and that I  
9 am neither counsel for, related to, nor employed by  
10 any of the parties to this case and have no interest,  
11 financial or otherwise, in its outcome.  
12 IN WITNESS WHEREOF, I have hereunto set my  
13 hand and affixed my notarial seal this 31st day  
14 of January, 2018.  
15 My commission expires:  
16 January 2, 2021  
17  
18  
19    
20  
21 NOTARY IN AND FOR THE  
22 STATE OF MARYLAND

78

1 ACKNOWLEDGMENT OF DEPONENT  
2 I, Melissa Hope Shachnovitz, do hereby  
3 acknowledge that I have read and examined the  
4 foregoing testimony, and the same is a true, correct  
5 and complete transcription of the testimony given by  
6 me, and any corrections appear on the attached Errata  
7 sheets signed by me.  
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11 (DATE) (SIGNATURE)  
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Transcript of Melissa Hope Shachnovitz  
 Conducted on January 19, 2018

<p><b>A</b></p> <p><b>aaaasf</b> 20:18</p> <p><b>abandoned</b> 34:8, 34:9</p> <p><b>able</b> 37:6, 42:22</p> <p><b>abortion</b> 41:7, 48:1, 49:17, 49:22, 57:15, 58:8, 58:13, 61:17, 63:22</p> <p><b>abortions</b> 46:2, 48:13, 63:18</p> <p><b>about</b> 6:1, 6:8, 7:15, 10:7, 11:8, 13:17, 14:21, 15:14, 18:13, 23:3, 24:1, 25:18, 31:21, 33:22, 36:17, 40:11, 41:20, 44:5, 45:22, 46:19, 48:21, 50:4, 50:10, 50:17, 51:2, 52:9, 53:5, 53:7, 53:15, 54:15, 54:18, 54:21, 55:8, 55:19, 58:7, 58:8, 59:8, 61:6, 62:4, 62:22, 63:22, 64:18, 64:21, 65:4, 65:9, 69:16, 70:18, 70:20, 71:2, 73:5, 73:11, 74:16, 75:22</p> <p><b>above</b> 36:14, 42:6</p> <p><b>absolutely</b> 25:4, 37:21,</p>	<p>41:10, 50:1, 51:4, 60:1, 62:21</p> <p><b>acceptable</b> 57:10</p> <p><b>access</b> 74:2, 74:6</p> <p><b>accredit</b> 20:19</p> <p><b>accreditation</b> 7:3, 7:12, 19:10, 19:22, 20:2, 20:10, 20:17</p> <p><b>accredited</b> 7:4, 7:11, 18:21, 19:8, 20:9, 71:7</p> <p><b>acknowledge</b> 78:3</p> <p><b>acknowledgment</b> 78:1</p> <p><b>acting</b> 64:10</p> <p><b>actions</b> 33:3</p> <p><b>actual</b> 13:22, 20:14, 29:1, 46:14, 53:3, 55:9</p> <p><b>actually</b> 6:13, 8:5, 11:12, 11:14, 12:4, 19:7, 22:6, 24:18, 28:7, 32:16, 35:19, 35:22, 41:18, 43:17, 61:6, 61:19, 67:12, 69:1, 70:22, 73:15</p> <p><b>address</b> 6:9, 24:10, 24:15</p> <p><b>adkins</b> 3:4</p> <p><b>administrative</b> 9:18</p>	<p><b>administrator</b> 13:4, 14:15, 14:17, 14:19, 15:17, 16:21, 18:14, 19:15, 19:18, 21:21, 24:16, 71:10, 71:17</p> <p><b>admit</b> 53:10</p> <p><b>advantage</b> 49:12</p> <p><b>advertised</b> 22:15, 23:11</p> <p><b>advertising</b> 22:1</p> <p><b>advice</b> 13:16, 63:21</p> <p><b>affiliated</b> 30:18, 50:21</p> <p><b>affirmed</b> 5:3</p> <p><b>affixed</b> 79:13</p> <p><b>after</b> 23:17, 32:13, 32:14, 35:5, 36:1, 36:4, 36:7, 36:11, 36:16, 37:7, 42:15, 48:1, 54:2, 66:20, 67:10, 67:14, 72:12, 72:17, 73:6, 74:5, 74:18, 75:4, 75:6</p> <p><b>afternoon</b> 26:13</p> <p><b>again</b> 10:9, 14:3, 30:8, 33:12, 34:19, 35:8, 37:12, 38:10, 39:3, 41:3, 47:5, 48:7, 53:1, 53:17, 56:11, 57:8,</p>	<p>57:19, 59:2, 65:3, 65:7, 67:2, 75:12</p> <p><b>agencies</b> 20:19, 21:2</p> <p><b>agency</b> 7:12, 8:21, 17:1, 18:21, 20:9, 20:10, 20:22, 21:11, 28:10, 37:9</p> <p><b>agent</b> 57:1, 61:17</p> <p><b>ago</b> 17:18</p> <p><b>ahead</b> 27:12</p> <p><b>al</b> 1:8</p> <p><b>alan</b> 9:5, 10:10</p> <p><b>all</b> 7:1, 8:20, 10:4, 10:16, 11:18, 15:21, 19:2, 20:20, 28:2, 29:8, 34:14, 36:2, 36:4, 36:9, 36:12, 36:13, 38:20, 39:2, 39:22, 40:22, 45:4, 51:1, 51:3, 53:12, 55:7, 58:11, 60:16, 62:3, 63:19, 66:17, 66:20, 74:19, 74:20, 76:17, 76:18, 77:11</p> <p><b>allow</b> 45:7</p> <p><b>almost</b> 51:12, 75:18</p> <p><b>already</b> 50:3, 53:18, 58:11, 64:10</p> <p><b>also</b> 11:17, 14:2,</p>
--	---	---	--

Transcript of Melissa Hope Shachnovitz  
 Conducted on January 19, 2018

<p>14:13, 17:8,                  19:6, 19:11,                  25:22, 32:3,                  32:4, 39:14,                  47:18, 48:3,                  60:5, 71:3  <b>always</b>                  35:10, 41:22,                  47:20, 51:1,                  51:13, 64:16,                  67:3, 74:7  <b>ama</b>                  13:4, 13:6,                  55:18, 55:20,                  56:3, 64:22,                  65:8  <b>american</b>                  15:10, 16:3,                  39:16, 39:20,                  40:3, 68:1,                  68:10, 68:11  <b>annapolis</b>                  3:13, 3:14  <b>anomaly</b>                  28:9  <b>another</b>                  12:5, 23:22,                  27:18, 34:17  <b>answer</b>                  22:13, 23:19,                  24:1, 24:8  <b>answered</b>                  23:6, 23:7,                  23:16, 73:15  <b>answering</b>                  8:8  <b>any</b>                  11:3, 11:7,                  13:10, 15:18,                  19:13, 19:20,                  21:20, 27:8,                  27:10, 27:12,                  27:16, 30:1,                  30:16, 30:21,                  31:3, 32:4,                  32:7, 32:9,                  35:3, 39:17,                  39:19, 40:9,</p>	<p>41:13, 47:1,                  47:3, 47:7,                  48:19, 50:6,                  50:20, 51:22,                  52:6, 58:3,                  58:4, 58:10,                  59:4, 61:22,                  63:6, 64:7,                  64:21, 66:19,                  68:2, 68:8,                  74:18, 76:8,                  76:14, 78:6,                  79:10  <b>anybody</b>                  13:16, 28:2,                  54:13, 54:20,                  59:12, 64:15,                  64:19, 72:21  <b>anybody's</b>                  72:22  <b>anymore</b>                  62:2, 67:9  <b>anyone</b>                  18:1  <b>anything</b>                  9:7, 11:8,                  22:5, 34:22,                  41:20, 45:22,                  51:11, 52:4,                  52:9, 55:6,                  59:6, 60:14,                  63:7, 65:4,                  73:11  <b>anywhere</b>                  74:14  <b>appeal</b>                  37:11, 37:12  <b>appear</b>                  78:6  <b>appointment</b>                  73:16, 73:21,                  74:4, 74:13  <b>appreciate</b>                  6:3, 77:13  <b>approve</b>                  39:17, 44:6  <b>approved</b>                  42:13, 42:15,</p>	<p>42:18  <b>area</b>                  69:9  <b>arise</b>                  52:3, 59:6  <b>arose</b>                  32:4, 33:2,                  38:18, 40:10  <b>around</b>                  8:6, 19:14,                  21:5, 21:7,                  37:3, 69:18  <b>articles</b>                  37:17, 53:12  <b>asf</b>                  18:22  <b>aside</b>                  50:16  <b>ask</b>                  13:7, 24:1,                  24:4, 25:8,                  71:21  <b>asked</b>                  76:5  <b>asking</b>                  46:5, 52:21  <b>assessed</b>                  74:14  <b>assistant</b>                  63:7, 63:13,                  63:16, 64:5  <b>assistants</b>                  42:9  <b>associates</b>                  3:12, 12:20,                  13:1, 13:3,                  13:5, 14:1,                  14:2, 14:14,                  14:16, 15:2,                  15:7, 15:18,                  16:3, 16:7,                  16:9, 18:14,                  19:18, 22:11,                  23:10, 23:11,                  24:17, 28:5,                  28:14, 28:20,                  29:5, 29:22,                  30:18, 38:12,</p>	<p>39:20, 40:3,                  41:4, 42:21,                  43:21, 45:17,                  46:1, 48:10,                  49:14, 50:8,                  50:22, 52:11,                  54:13, 54:21,                  55:10, 55:19,                  55:22, 56:8,                  56:10, 56:14,                  56:22, 58:19,                  61:10, 61:21,                  62:14, 64:11,                  65:1, 65:9,                  66:7, 66:14,                  68:2, 68:18,                  71:3, 73:8,                  73:13, 76:1  <b>assume</b>                  48:7, 48:9,                  57:8  <b>assumed</b>                  62:5  <b>attached</b>                  78:6  <b>attempt</b>                  10:18  <b>attempted</b>                  53:22  <b>attend</b>                  6:4, 30:7  <b>attended</b>                  30:5, 30:13  <b>attention</b>                  59:7  <b>attorney</b>                  37:12, 37:19  <b>available</b>                  46:7, 57:22,                  71:10, 74:9  <b>avenue</b>                  24:12  <b>aware</b>                  12:14, 22:22,                  30:10, 32:2,                  32:3, 48:11,                  48:20, 50:6,                  50:20, 61:9,</p>
---	---	--	--

Transcript of Melissa Hope Shachnovitz  
 Conducted on January 19, 2018

<p>61:14, 61:15,                  61:18, 65:12,                  68:2, 76:7  <b>away</b>                  50:4, 50:18,                  67:7</p> <hr/> <p style="text-align: center;"><b>B</b></p> <hr/> <p><b>back</b>                  8:19, 16:14,                  18:12, 20:1,                  27:21, 53:1,                  75:7, 76:11,                  77:12  <b>background</b>                  7:16, 7:17  <b>baltimore</b>                  3:7, 15:15,                  26:4, 26:10,                  34:19, 36:3,                  36:10, 38:8,                  38:9, 44:13,                  50:4, 50:18  <b>bardos</b>                  38:6  <b>basco</b>                  27:1, 27:9,                  33:5, 33:6,                  33:7, 33:19,                  35:16, 36:17,                  40:19, 50:13,                  67:2, 69:16,                  69:17  <b>basco's</b>                  36:4, 36:11  <b>base</b>                  23:19  <b>based</b>                  8:2, 38:11  <b>battle</b>                  66:21, 67:3  <b>beach</b>                  19:7, 19:11  <b>bear</b>                  21:14, 75:18  <b>became</b>                  10:3, 17:5  <b>because</b>                  10:9, 26:5,</p>	<p>26:13, 28:21,                  30:8, 30:22,                  32:11, 32:15,                  33:2, 33:8,                  34:8, 36:12,                  37:8, 40:14,                  40:15, 43:1,                  43:18, 44:22,                  49:3, 51:16,                  54:3, 56:11,                  60:5, 63:3,                  70:1, 71:5  <b>become</b>                  7:4, 53:9  <b>been</b>                  11:7, 27:20,                  28:8, 35:2,                  37:4, 40:11,                  47:14, 56:16,                  66:18, 69:5,                  71:9, 75:13,                  75:21, 76:5  <b>before</b>                  2:20, 10:17,                  13:8, 13:11,                  13:13, 49:17,                  49:21, 54:1,                  56:17, 57:20,                  65:3, 65:6,                  65:7, 66:12,                  69:19, 75:3,                  75:13, 79:2  <b>began</b>                  76:21  <b>begin</b>                  34:6  <b>beginning</b>                  45:16  <b>begins</b>                  26:18  <b>behalf</b>                  3:2, 3:10  <b>being</b>                  5:3, 12:15,                  31:22, 52:14,                  75:2  <b>bekman</b>                  3:4</p>	<p><b>believe</b>                  11:21, 11:22,                  12:12, 12:16,                  14:8, 16:4,                  21:6, 25:21,                  26:4, 26:17,                  27:5, 27:10,                  27:19, 28:7,                  30:11, 31:1,                  31:2, 33:9,                  35:17, 35:18,                  37:8, 39:22,                  40:4, 44:12,                  46:7, 46:12,                  46:15, 50:10,                  54:19, 55:16,                  64:20, 65:10,                  66:1, 68:13,                  69:15, 69:18,                  69:20, 71:1,                  73:17, 75:12,                  76:3  <b>believed</b>                  76:6  <b>besides</b>                  21:19, 27:8,                  50:16  <b>best</b>                  24:5, 28:4,                  77:14  <b>between</b>                  26:5, 26:14,                  46:16, 60:3,                  67:21, 70:11  <b>beyond</b>                  59:7  <b>biannual</b>                  20:21  <b>birth</b>                  47:16, 52:15,                  52:18, 58:14  <b>bit</b>                  6:8, 7:15  <b>blood</b>                  47:3, 63:15  <b>board</b>                  20:14  <b>boss</b>                  9:3, 64:15,</p>	<p>64:18, 72:19,                  72:22, 73:2  <b>both</b>                  12:6, 39:17  <b>bother</b>                  6:6  <b>branch</b>                  44:9, 44:11  <b>brief</b>                  66:16  <b>briefly</b>                  5:9  <b>brigham</b>                  1:7, 9:8, 9:10,                  10:3, 10:5,                  10:14, 10:16,                  13:13, 13:22,                  14:6, 16:4,                  18:13, 18:17,                  19:14, 29:22,                  30:13, 30:17,                  31:19, 32:2,                  32:3, 32:5,                  32:7, 32:8,                  33:1, 33:13,                  39:9, 40:2,                  40:9, 41:1,                  55:7, 55:15,                  55:20, 64:20,                  64:22, 65:19,                  66:2, 67:10,                  68:3, 70:3,                  70:8, 70:11,                  70:15, 71:22,                  72:10, 72:11,                  72:14, 76:2,                  77:8  <b>brigham's</b>                  12:15, 15:7,                  31:12, 38:14,                  38:18, 65:5,                  65:9  <b>brochures</b>                  58:12, 58:15  <b>brown</b>                  2:4  <b>bunch</b>                  76:13</p>
--	---	---	---



Transcript of Melissa Hope Shachnovitz  
 Conducted on January 19, 2018

<p><b>busiest</b> 44:17</p> <p><b>business</b> 18:10, 39:19, 61:2, 66:18, 68:2</p> <hr/> <p style="text-align: center;"><b>C</b></p> <hr/> <p><b>call</b> 11:19, 11:20, 22:7, 22:8, 22:12, 22:15, 23:10, 23:14, 23:18, 24:10, 51:9, 51:19, 70:8, 73:5, 73:7, 73:9, 73:14, 73:15, 73:19, 74:5</p> <p><b>called</b> 11:21, 12:1, 18:22, 21:13, 28:11, 35:1, 49:4, 64:22, 68:4, 73:12, 74:5</p> <p><b>calling</b> 43:16</p> <p><b>calls</b> 22:18, 23:19</p> <p><b>came</b> 10:7, 45:11, 45:12, 51:12, 56:12, 64:21, 64:22, 65:17, 66:5, 72:8, 75:6</p> <p><b>can</b> 16:8, 20:19, 25:10, 25:12, 28:2, 37:12, 37:21, 42:5, 43:8, 43:9, 49:4, 64:1, 69:21</p> <p><b>can't</b> 9:14, 12:4, 22:14, 23:21, 24:3, 28:1,</p>	<p>31:3, 35:18, 38:3, 44:22, 45:12, 69:17, 70:15, 71:16, 76:4, 76:20</p> <p><b>capacity</b> 14:4, 56:6, 58:21, 63:6</p> <p><b>cardiomyopathy</b> 35:1</p> <p><b>care</b> 13:2, 15:8, 15:18, 16:9, 16:16, 16:20, 16:22, 17:4, 17:8, 17:11, 17:13, 18:15, 19:18, 22:12, 23:10, 23:11, 24:17, 28:6, 28:8, 28:11, 28:15, 28:20, 29:5, 29:17, 29:22, 30:18, 34:22, 38:12, 41:5, 42:9, 42:21, 43:21, 45:17, 46:1, 47:9, 48:1, 48:11, 49:14, 50:7, 50:8, 50:21, 50:22, 52:11, 54:14, 54:21, 55:10, 61:11, 65:2, 66:7, 66:15, 68:5, 68:14, 68:18, 68:20, 72:8, 73:13, 76:1</p> <p><b>case</b> 1:6, 5:10, 34:1, 34:3, 34:21, 49:5, 53:13, 53:18, 54:16, 55:8, 74:8, 79:10</p> <p><b>caused</b> 33:15, 33:16,</p>	<p>35:14</p> <p><b>center</b> 22:7, 22:8, 23:14, 24:11, 73:6, 73:9, 73:14, 73:19, 74:6</p> <p><b>centralized</b> 23:13</p> <p><b>certainly</b> 40:18, 43:10, 46:3, 47:10, 50:1, 64:1, 71:8, 73:17</p> <p><b>certificate</b> 79:1</p> <p><b>certification</b> 42:6, 45:19</p> <p><b>certified</b> 42:4, 42:5, 42:7, 42:16, 42:22, 43:2, 43:8, 45:8, 61:12</p> <p><b>certify</b> 79:3</p> <p><b>cervix</b> 33:22, 34:4</p> <p><b>cfo</b> 29:9, 68:18, 72:10</p> <p><b>chance</b> 76:10</p> <p><b>change</b> 8:17</p> <p><b>changing</b> 58:4</p> <p><b>charge</b> 60:13</p> <p><b>chart</b> 44:5, 46:10</p> <p><b>charts</b> 59:2, 59:3</p> <p><b>check</b> 29:2</p> <p><b>checking</b> 76:18</p> <p><b>checks</b> 29:7, 29:8</p>	<p><b>cheverly</b> 15:15, 25:22, 26:11, 26:12, 44:9, 44:16</p> <p><b>childhood</b> 8:1, 8:12</p> <p><b>children</b> 8:14</p> <p><b>choosing</b> 49:21</p> <p><b>christine</b> 26:3</p> <p><b>christopher</b> 3:11</p> <p><b>christy</b> 1:4, 5:11, 52:10</p> <p><b>circumstances</b> 77:15</p> <p><b>city</b> 69:18</p> <p><b>clearly</b> 47:14</p> <p><b>client</b> 18:2</p> <p><b>clients</b> 7:6, 18:8</p> <p><b>clinic</b> 22:12, 23:10, 48:12, 50:4, 73:20, 75:8</p> <p><b>clinics</b> 14:13, 14:14, 14:22, 20:1, 21:12, 21:20, 21:22, 25:11, 30:17, 31:10, 31:13, 31:16, 31:20, 32:9, 32:22, 35:19, 39:21, 40:7, 45:7, 45:14, 45:18, 48:20, 59:19, 60:8, 61:1, 61:16, 65:2, 65:5, 66:6, 66:12, 68:11, 71:20,</p>
---	---	---	--

Transcript of Melissa Hope Shachnovitz  
 Conducted on January 19, 2018

<p>72:1, 72:2,                  74:9, 75:11,                  77:2  <b>close</b>                  36:12  <b>closed</b>                  10:2, 35:19,                  35:20, 36:2,                  36:3, 36:5,                  36:16, 36:18  <b>closing</b>                  10:11, 12:6  <b>closure</b>                  36:7, 74:17  <b>code</b>                  69:10  <b>come</b>                  5:17, 28:2,                  30:1, 34:5,                  41:6, 52:5,                  57:14, 58:16,                  70:18, 73:16,                  75:7  <b>coming</b>                  13:11, 13:13,                  22:3  <b>comment</b>                  62:12  <b>commission</b>                  79:15  <b>commonly</b>                  49:8  <b>communicated</b>                  52:4, 73:20  <b>company</b>                  28:11, 28:14,                  37:15, 53:5  <b>compared</b>                  59:14  <b>competent</b>                  62:20  <b>complaint</b>                  31:21, 32:1,                  34:12, 34:15,                  36:16, 52:3  <b>complete</b>                  34:5, 34:10,                  78:5</p>	<p><b>completed</b>                  34:11  <b>completely</b>                  7:17, 23:22,                  34:19, 34:21  <b>comply</b>                  7:13  <b>computer</b>                  74:1, 74:8,                  74:10  <b>computers</b>                  74:1  <b>concluded</b>                  74:19, 74:20,                  74:22  <b>condition</b>                  35:1, 35:2  <b>confirm</b>                  46:20  <b>consent</b>                  57:16, 58:5  <b>considered</b>                  44:12  <b>consult</b>                  14:2, 14:11,                  18:19, 19:1,                  19:7  <b>consultant</b>                  18:18  <b>consultants</b>                  9:2, 9:4  <b>consultation</b>                  63:22  <b>consulting</b>                  6:14, 6:17,                  6:21, 7:9, 9:7,                  9:17, 17:21,                  18:1, 19:13,                  70:1, 71:5, 71:8  <b>contact</b>                  10:14, 11:19,                  32:15, 32:19,                  33:1  <b>contacted</b>                  54:2  <b>continue</b>                  67:16  <b>continuing</b>                  52:17</p>	<p><b>contract</b>                  15:11, 65:1  <b>contracted</b>                  13:5  <b>contractor</b>                  6:13, 17:6,                  55:18  <b>control</b>                  47:16, 52:15,                  58:14  <b>convenient</b>                  77:14  <b>converse</b>                  24:2  <b>cooperate</b>                  6:4, 40:17  <b>cooperation</b>                  77:13  <b>copies</b>                  53:4  <b>corner</b>                  29:2  <b>corp</b>                  28:8, 29:17,                  68:14, 68:20,                  72:9  <b>corporation</b>                  28:12  <b>correct</b>                  11:12, 14:15,                  14:20, 15:16,                  16:11, 17:15,                  17:17, 17:20,                  17:22, 21:3,                  29:18, 31:17,                  34:16, 43:4,                  44:2, 44:7,                  45:21, 50:5,                  56:4, 57:16,                  60:20, 61:3,                  61:8, 61:13,                  61:17, 64:13,                  65:21, 66:4,                  66:8, 68:19,                  68:21, 70:12,                  73:10, 78:4,                  79:5  <b>corrected</b>                  36:1</p>	<p><b>corrections</b>                  78:6  <b>correctly</b>                  31:14  <b>correspondence</b>                  5:17, 54:4,                  54:11, 69:7  <b>corresponding</b>                  52:22  <b>couch</b>                  35:3  <b>could</b>                  6:7, 27:20,                  35:2, 35:4,                  47:13, 64:5,                  73:15, 73:17,                  74:2, 74:13  <b>couldn't</b>                  11:7, 53:3,                  57:4, 67:8  <b>counsel</b>                  5:6, 79:9  <b>counseling</b>                  58:14  <b>couple</b>                  11:13, 12:20,                  17:18, 26:7,                  26:9, 36:8  <b>course</b>                  10:18, 23:16,                  26:22, 32:3,                  35:13, 53:11  <b>court</b>                  1:1, 34:20,                  37:13, 75:2  <b>courtesy</b>                  63:3  <b>crr</b>                  1:22, 2:21  <b>crystal</b>                  26:17, 76:21  <b>current</b>                  6:9, 17:5  <b>currently</b>                  6:12, 39:7  <b>cut</b>                  24:7  <hr/> <p style="text-align: center;">D</p> <hr/> <b>daily</b>                  60:15, 60:22</p>
---	--	--	--

Transcript of Melissa Hope Shachnovitz  
 Conducted on January 19, 2018

<p><b>date</b> 78:11</p> <p><b>dawn</b> 1:22, 2:20, 79:2</p> <p><b>day</b> 52:1, 79:13</p> <p><b>day-to-day</b> 59:19, 60:15, 73:1</p> <p><b>days</b> 24:19, 24:20, 46:13, 60:3, 60:5</p> <p><b>dealing</b> 40:10</p> <p><b>death</b> 34:18, 34:21, 35:6</p> <p><b>deceased</b> 62:8</p> <p><b>december</b> 17:9, 25:4</p> <p><b>decided</b> 10:11, 18:3, 71:4, 72:17</p> <p><b>decision</b> 45:6, 57:6</p> <p><b>decisions</b> 61:6</p> <p><b>dedicated</b> 44:18</p> <p><b>defendants</b> 1:9, 3:10</p> <p><b>definitely</b> 29:11, 37:21, 45:4</p> <p><b>definitively</b> 76:4</p> <p><b>delaware</b> 67:20</p> <p><b>delivered</b> 52:18</p> <p><b>delivery</b> 28:8, 28:12, 29:17, 68:14, 68:20, 72:9</p> <p><b>demonstrated</b> 36:6</p>	<p><b>department</b> 20:15, 21:15, 21:16, 21:17, 34:13, 36:6</p> <p><b>depended</b> 47:2, 47:5</p> <p><b>depending</b> 20:8, 48:3, 73:22</p> <p><b>depends</b> 20:21</p> <p><b>deponent</b> 78:1</p> <p><b>deposition</b> 1:11, 2:1, 5:19, 79:3</p> <p><b>describe</b> 71:11</p> <p><b>described</b> 38:14</p> <p><b>description</b> 71:18</p> <p><b>determined</b> 52:16</p> <p><b>diagnosed</b> 52:13</p> <p><b>dialed</b> 22:22</p> <p><b>did</b> 7:16, 8:3, 8:11, 8:13, 8:15, 8:16, 9:6, 9:20, 10:4, 10:6, 10:7, 10:16, 11:18, 11:19, 12:3, 13:10, 14:2, 14:11, 15:21, 16:1, 16:4, 16:5, 16:12, 17:3, 18:13, 18:17, 19:13, 19:16, 20:1, 20:2, 21:21, 22:19, 23:19, 24:17, 28:13, 28:21, 29:12, 29:14, 29:21,</p>	<p>29:22, 30:7, 30:16, 31:18, 32:7, 34:6, 36:12, 39:22, 40:4, 40:9, 41:10, 41:11, 41:13, 42:16, 45:19, 45:20, 46:22, 47:3, 48:16, 49:14, 51:3, 52:6, 53:9, 53:11, 54:8, 54:9, 54:18, 54:19, 55:7, 57:17, 58:17, 59:8, 61:19, 61:21, 63:5, 63:8, 63:11, 63:12, 64:14, 66:14, 67:10, 67:19, 68:22, 69:2, 71:11, 71:15, 71:18, 71:21, 71:22, 73:1, 73:12, 74:18, 76:17</p> <p><b>didn't</b> 23:21, 26:13, 28:19, 33:9, 33:11, 43:22, 53:13, 53:19, 63:10, 74:1</p> <p><b>difference</b> 20:4</p> <p><b>different</b> 14:11, 20:19, 58:13, 60:7, 72:22</p> <p><b>difficult</b> 31:22</p> <p><b>dilated</b> 35:1</p> <p><b>diner</b> 67:15</p> <p><b>direction</b> 79:7</p> <p><b>directly</b> 28:14</p>	<p><b>director</b> 45:11, 45:13, 47:11, 55:18, 55:22, 56:7, 56:10, 56:13, 56:17, 57:9, 58:18, 60:9, 61:4, 62:14</p> <p><b>discharge</b> 58:9</p> <p><b>discuss</b> 32:2</p> <p><b>discussion</b> 62:10</p> <p><b>distance</b> 30:8, 67:5</p> <p><b>district</b> 1:1, 1:2, 14:5, 18:19, 31:4, 31:5, 31:6, 31:7, 60:11, 60:12, 60:21, 64:11, 66:6</p> <p><b>doctor</b> 10:12, 31:22, 34:4, 35:11, 43:7, 43:11, 43:13, 44:5, 47:2, 47:5, 51:9, 72:1</p> <p><b>doctors</b> 10:10, 12:21, 13:5, 18:5, 25:10, 26:22, 27:8, 27:11, 30:19, 30:21, 32:7, 32:12, 32:16, 39:21, 40:1, 40:6, 47:19, 49:2, 49:11, 60:7, 60:14, 67:1, 69:16</p> <p><b>document</b> 57:16, 57:18</p> <p><b>documents</b> 57:19</p> <p><b>does</b> 70:18</p>
--	--	---	--

Transcript of Melissa Hope Shachnovitz  
 Conducted on January 19, 2018

<p><b>doing</b>                  13:19, 18:7,                  19:20, 19:21,                  33:22, 36:22,                  37:5, 42:3,                  49:15, 63:8,                  75:16  <b>dominy</b>                  27:1, 27:8,                  35:16, 35:17,                  40:19, 51:2,                  51:3, 51:12,                  51:21, 52:15,                  54:18  <b>dominy's</b>                  34:18, 34:22,                  35:18, 36:1,                  36:8, 50:7,                  50:21  <b>don't</b>                  5:14, 6:7,                  8:13, 9:11,                  9:15, 14:8,                  20:16, 24:14,                  25:7, 25:13,                  27:10, 30:20,                  31:2, 36:5,                  36:9, 37:8,                  37:13, 37:16,                  39:1, 40:12,                  41:11, 45:2,                  45:10, 47:20,                  49:6, 52:14,                  52:20, 53:2,                  54:19, 55:6,                  55:9, 55:17,                  55:19, 56:6,                  58:3, 58:11,                  58:15, 60:4,                  62:4, 63:2,                  64:2, 64:16,                  64:17, 65:3,                  65:14, 66:9,                  68:15, 69:5,                  69:6, 69:12,                  72:21, 73:3,                  74:22, 75:4,                  76:4, 76:22,</p>	<p>77:9  <b>done</b>                  16:19, 20:11,                  24:4, 24:8,                  75:19  <b>dose</b>                  46:11  <b>down</b>                  34:14, 35:7,                  70:1  <b>dozens</b>                  11:1  <b>drafted</b>                  57:18, 58:10  <b>drink</b>                  46:9  <b>driving</b>                  25:3  <b>dropped</b>                  8:16  <b>drug</b>                  49:21  <b>duly</b>                  5:3  <b>during</b>                  32:12, 32:19,                  58:6, 75:21  <b>duties</b>                  42:10</p> <hr/> <p style="text-align: center;"><b>E</b></p> <hr/> <p><b>each</b>                  22:15, 47:12,                  60:2  <b>earlier</b>                  28:4, 44:8,                  48:21, 68:18,                  73:5, 74:15  <b>early</b>                  7:22, 8:11,                  21:7  <b>easily</b>                  74:2  <b>east</b>                  2:5  <b>ectopic</b>                  49:5  <b>education</b>                  8:1, 8:12</p>	<p><b>educational</b>                  7:15, 7:17,                  58:7, 58:8  <b>effect</b>                  21:6  <b>effectuate</b>                  49:21  <b>efficient</b>                  18:4, 18:6  <b>eight</b>                  26:8, 46:13  <b>either</b>                  45:8, 64:9  <b>elkton</b>                  1:12, 2:6,                  65:11  <b>else</b>                  18:1, 22:5,                  28:2, 52:21,                  55:6, 59:12,                  63:7  <b>email</b>                  69:7  <b>emily</b>                  3:3, 5:9  <b>employed</b>                  10:3, 39:16,                  50:7, 72:4,                  75:22, 79:9  <b>employee</b>                  12:5, 17:10,                  17:13, 17:19,                  36:20, 52:2,                  55:17, 72:14,                  77:1, 77:6  <b>employees</b>                  6:19, 11:13,                  11:14, 25:7,                  25:8, 26:5,                  27:17, 28:21,                  44:20  <b>employer</b>                  13:22  <b>employment</b>                  8:3  <b>end</b>                  16:12, 17:12  <b>enough</b>                  8:14, 33:12,</p>	<p>34:2  <b>entire</b>                  31:5, 56:14,                  57:22  <b>entities</b>                  68:3  <b>entity</b>                  13:3, 13:6,                  64:17, 64:22,                  72:10  <b>episode</b>                  35:15  <b>errata</b>                  78:6  <b>esquire</b>                  3:3, 3:11  <b>essentially</b>                  6:14, 17:10,                  34:8, 39:16,                  57:4, 63:16  <b>establish</b>                  16:8  <b>et</b>                  1:8  <b>even</b>                  19:9, 24:3,                  25:8, 45:16,                  49:12, 53:13,                  53:19, 58:15,                  64:5, 65:15,                  72:9  <b>eventually</b>                  8:8, 10:14,                  37:1, 72:13  <b>ever</b>                  8:11, 24:7,                  30:6, 37:6,                  48:11, 48:15,                  54:18, 54:20,                  58:4, 63:5,                  63:20, 65:4,                  75:1, 76:5, 76:7  <b>every</b>                  30:11, 43:14,                  59:2  <b>everything</b>                  20:12  <b>evesham</b>                  24:12</p>
---	--	---	---

Transcript of Melissa Hope Shachnovitz  
 Conducted on January 19, 2018

<p><b>evolved</b> 8:8, 9:22</p> <p><b>exact</b> 24:14</p> <p><b>exactly</b> 7:10, 12:4, 13:3, 17:22, 18:11, 21:18, 31:7, 34:16, 39:1, 39:11, 41:12, 43:9, 53:17, 55:11, 65:16, 67:18, 69:13, 71:16</p> <p><b>exam</b> 47:1, 47:15</p> <p><b>examination</b> 4:2, 5:6, 46:17, 46:18, 47:18, 48:2</p> <p><b>examined</b> 5:5, 78:3</p> <p><b>example</b> 63:13</p> <p><b>examples</b> 7:5</p> <p><b>exhibits</b> 4:8</p> <p><b>experience</b> 21:9, 42:20, 52:11, 55:12</p> <p><b>expires</b> 35:12, 79:15</p> <p><b>explain</b> 64:6, 69:21</p> <p><b>extrauterine</b> 49:20</p> <hr/> <p style="text-align: center;"><b>F</b></p> <hr/> <p><b>facebook</b> 37:20</p> <p><b>facilities</b> 7:11, 11:16, 30:20, 31:1, 35:7, 36:2, 36:5, 36:15, 38:22, 41:3, 60:3, 60:16,</p>	<p>67:2, 71:17, 73:4, 74:17</p> <p><b>facility</b> 8:8, 8:18, 32:18, 33:14, 34:22, 35:5, 39:3, 40:16, 47:6, 60:2</p> <p><b>factors</b> 67:6, 67:8</p> <p><b>faculties</b> 62:19</p> <p><b>failure</b> 49:7</p> <p><b>familiar</b> 11:3, 11:8, 19:1</p> <p><b>family</b> 8:7, 8:18, 8:21, 10:22, 16:22, 21:1, 21:12, 28:13</p> <p><b>far</b> 19:2</p> <p><b>father</b> 67:6</p> <p><b>fax</b> 74:7</p> <p><b>feedback</b> 51:2</p> <p><b>feel</b> 49:2, 76:21</p> <p><b>few</b> 18:6, 18:20, 19:10, 26:14, 51:4, 56:18, 56:21, 75:3, 75:12</p> <p><b>field</b> 9:13, 10:9</p> <p><b>filed</b> 34:12</p> <p><b>files</b> 77:1, 77:6</p> <p><b>fill</b> 62:6, 71:20</p> <p><b>filled</b> 66:17</p>	<p><b>finally</b> 66:22</p> <p><b>financial</b> 72:5, 79:11</p> <p><b>find</b> 39:22, 40:5, 54:8, 63:14</p> <p><b>finding</b> 39:9, 39:21</p> <p><b>findings</b> 48:4</p> <p><b>fine</b> 33:18, 45:3, 47:16, 62:15, 62:18, 62:19</p> <p><b>finger</b> 63:14</p> <p><b>first</b> 5:3, 8:20, 9:16, 10:17, 11:19, 13:21, 27:2, 33:10, 35:15, 35:18, 36:6, 38:2, 71:5, 72:11, 76:13, 76:20</p> <p><b>five</b> 12:16, 27:21, 46:12, 60:3, 60:4</p> <p><b>floor</b> 23:18</p> <p><b>florida</b> 69:20</p> <p><b>follow</b> 47:20</p> <p><b>follow-up</b> 46:17, 46:18, 46:22, 47:9, 48:1</p> <p><b>followed</b> 47:21</p> <p><b>following</b> 14:11</p> <p><b>follows</b> 5:5</p> <p><b>foregoing</b> 78:4, 79:3,</p>	<p>79:4</p> <p><b>forget</b> 67:20</p> <p><b>forgot</b> 13:7</p> <p><b>form</b> 46:9</p> <p><b>forms</b> 57:21, 57:22, 58:5, 58:11, 64:7</p> <p><b>forth</b> 47:11</p> <p><b>found</b> 54:7, 62:1</p> <p><b>four</b> 15:13, 15:21, 18:22, 24:19, 27:21, 44:16, 53:1, 60:3, 66:6, 67:6, 71:17</p> <p><b>frame</b> 16:9</p> <p><b>frederick</b> 15:15, 44:11, 44:14, 44:20, 44:21</p> <p><b>friday</b> 1:13</p> <p><b>friends</b> 37:20</p> <p><b>from</b> 5:17, 8:15, 11:9, 13:5, 17:12, 18:13, 20:18, 22:3, 22:11, 28:5, 29:3, 35:10, 37:17, 38:13, 45:11, 45:12, 51:12, 52:5, 52:12, 52:20, 53:17, 57:11, 58:16, 61:2, 65:7, 67:5, 72:8, 74:14</p> <p><b>full</b> 24:20</p>
--	---	---	--

Transcript of Melissa Hope Shachnovitz  
 Conducted on January 19, 2018

<p><b>full-time</b> 71:9, 71:10</p> <p><b>functions</b> 39:19</p> <p><b>further</b> 47:15, 47:17</p> <p><b>furthest</b> 44:22</p> <hr/> <p style="text-align: center;"><b>G</b></p> <p><b>gaithersburg</b> 69:15</p> <p><b>garden</b> 7:7, 17:8, 17:9, 17:16</p> <p><b>gather</b> 75:19</p> <p><b>gave</b> 11:22</p> <p><b>generally</b> 38:17</p> <p><b>generic</b> 58:8</p> <p><b>get</b> 5:20, 8:3, 10:8, 11:19, 13:16, 16:14, 18:6, 21:20, 23:9, 33:11, 39:7, 41:1, 41:2, 46:11, 51:21</p> <p><b>getting</b> 18:21, 19:8, 34:2, 54:3, 69:22</p> <p><b>give</b> 7:5, 36:14, 37:20, 71:18</p> <p><b>given</b> 33:21, 46:3, 46:9, 46:12, 58:9, 76:12, 78:5, 79:5</p> <p><b>go</b> 12:3, 15:21, 18:3, 18:12, 19:11, 27:12,</p>	<p>64:6, 76:11</p> <p><b>goal</b> 18:8</p> <p><b>going</b> 24:4, 27:21, 48:7, 53:1, 55:4, 56:18, 61:10, 62:5, 70:8, 73:21</p> <p><b>good</b> 43:9, 70:8</p> <p><b>got</b> 13:7, 23:1, 67:2</p> <p><b>gotten</b> 52:19</p> <p><b>government</b> 21:11</p> <p><b>graduate</b> 8:15</p> <p><b>greaney</b> 3:11, 13:8, 62:5, 77:17</p> <p><b>great</b> 26:20</p> <p><b>grocery</b> 35:3</p> <p><b>groundwork</b> 10:13</p> <p><b>group</b> 9:20, 9:21, 10:11, 12:5, 65:8</p> <p><b>grow</b> 18:10</p> <p><b>guess</b> 38:17, 42:8, 51:20, 56:18, 56:21</p> <p><b>gyn</b> 13:1, 14:14, 14:16, 15:2, 15:7, 15:18, 16:7, 16:9, 18:14, 19:18, 22:12, 23:10, 23:11, 24:17, 28:6, 28:15,</p>	<p>28:20, 29:5, 29:22, 30:18, 38:12, 41:5, 42:21, 43:21, 45:17, 46:1, 48:11, 49:14, 50:8, 50:22, 52:11, 54:14, 54:21, 55:10, 61:10, 65:2, 66:7, 66:14, 68:18, 73:13, 76:1</p> <p><b>gynecologic</b> 9:1, 9:16, 69:22</p> <p><b>gynecological</b> 9:1, 9:3, 9:6</p> <p><b>gynecology</b> 7:7, 17:8, 17:16</p> <hr/> <p style="text-align: center;"><b>H</b></p> <p><b>had</b> 10:17, 10:19, 10:20, 11:6, 11:12, 12:11, 12:16, 12:19, 14:7, 14:8, 14:13, 20:2, 21:9, 22:15, 26:14, 28:10, 28:12, 28:16, 30:22, 31:2, 31:21, 32:10, 33:9, 33:19, 34:3, 34:8, 35:1, 37:10, 37:15, 39:12, 39:17, 40:12, 41:18, 44:10, 44:17, 44:18, 52:12, 52:19, 53:18, 55:15, 56:3, 56:16, 57:10, 57:15, 58:13, 62:19, 65:10, 66:2,</p>	<p>66:19, 67:6, 67:14, 68:9, 70:13, 71:4, 71:7, 72:5, 72:22, 74:1, 74:19, 74:20, 74:22, 75:7, 75:13, 76:10</p> <p><b>hal</b> 51:5, 51:13, 51:16, 51:17, 52:5</p> <p><b>hamilton</b> 12:13, 71:1</p> <p><b>hand</b> 79:13</p> <p><b>handed</b> 28:22</p> <p><b>handled</b> 51:13</p> <p><b>hands-on</b> 39:15</p> <p><b>happen</b> 35:7, 42:20, 74:18</p> <p><b>happened</b> 32:11, 33:6, 35:4, 37:2, 37:16, 39:1, 40:16, 52:10, 55:9, 75:3, 75:4</p> <p><b>happens</b> 35:10</p> <p><b>happy</b> 50:14</p> <p><b>hart</b> 1:22, 2:20, 79:2</p> <p><b>has</b> 35:11, 43:6, 43:14, 47:14</p> <p><b>have</b> 6:15, 6:19, 8:14, 9:7, 13:8, 13:9, 13:10, 13:13, 13:16, 16:14, 16:19, 20:1, 20:2,</p>
--	--	--	---

Transcript of Melissa Hope Shachnovitz  
 Conducted on January 19, 2018

20:17, 21:21, 26:13, 27:20, 28:8, 28:13, 29:13, 31:18, 32:7, 32:15, 32:19, 35:2, 35:4, 36:2, 36:3, 37:4, 40:9, 42:11, 43:17, 43:22, 44:6, 45:19, 46:10, 48:8, 49:1, 49:10, 49:15, 52:6, 52:15, 55:2, 56:3, 57:8, 57:12, 58:17, 61:21, 62:5, 63:12, 64:21, 65:1, 65:4, 71:9, 73:21, 74:6, 76:21, 77:6, 77:11, 77:12, 77:17, 78:3, 79:10, 79:12 <b>having</b> 30:17, 74:15 <b>he's</b> 62:4, 70:7 <b>head</b> 28:1 <b>health</b> 16:16, 16:19, 16:22, 17:3, 17:8, 17:10, 17:13, 20:15, 21:16, 21:17, 28:8, 28:10, 28:11, 28:12, 28:13, 28:16, 29:17, 68:5, 68:14, 68:20, 72:8 <b>heard</b> 10:18, 10:21, 14:10, 37:16, 53:7, 64:16,	65:4, 70:13 <b>hearing</b> 51:2 <b>held</b> 2:2, 62:10 <b>helping</b> 21:19 <b>helps</b> 26:18 <b>her</b> 5:13, 5:16, 19:12, 26:18, 27:19, 29:14, 29:15, 34:4, 35:2, 35:3, 47:16, 50:10, 50:16, 51:4, 51:7, 51:12, 51:13, 51:14, 51:15, 51:16, 51:20, 52:10, 52:15, 54:12, 55:10, 55:12, 59:9, 60:10, 63:2, 69:6, 73:15, 73:21 <b>here</b> 5:19, 13:11, 13:14, 13:19, 34:3, 50:9, 53:6, 62:2 <b>hereby</b> 78:2, 79:3 <b>hereunto</b> 79:12 <b>hers</b> 50:11 <b>herself</b> 64:2 <b>hey</b> 71:12 <b>higher</b> 49:10, 49:12 <b>highest</b> 44:17 <b>him</b> 10:15, 10:17, 10:19, 10:20,	10:21, 11:11, 11:14, 11:16, 11:20, 11:22, 30:3, 32:15, 32:20, 33:22, 38:4, 38:9, 48:9, 55:16, 58:22, 67:12, 70:9, 72:15, 76:7 <b>hire</b> 10:12 <b>hired</b> 13:21, 14:6, 56:9, 72:10, 72:13 <b>hiring</b> 76:17 <b>his</b> 10:18, 11:3, 11:7, 11:15, 12:3, 12:7, 12:9, 13:6, 14:3, 18:19, 33:9, 36:12, 38:3, 38:9, 55:19, 62:19, 64:18, 71:1, 76:5 <b>history</b> 8:3, 65:12 <b>holiday</b> 30:5, 30:7, 30:14 <b>home</b> 46:14, 74:14 <b>home-based</b> 69:1 <b>honestly</b> 14:9, 31:21, 36:10, 45:12, 51:1, 64:5, 68:16, 71:21, 72:20 <b>honoring</b> 20:20 <b>hope</b> 1:11, 2:1, 4:2,	5:2, 6:6, 78:2 <b>hour</b> 33:22 <b>hours</b> 23:17, 26:7, 26:9, 73:6, 74:5 <b>house</b> 67:5, 69:6, 76:5 <b>how</b> 8:3, 9:20, 10:7, 10:20, 11:18, 17:3, 22:10, 22:21, 22:22, 23:1, 24:17, 28:16, 28:19, 34:6, 36:15, 46:4, 51:6, 53:9, 54:8, 54:9, 56:16, 58:7, 59:8, 61:7, 62:4, 62:13, 62:22, 64:18, 64:21, 66:9, 69:16, 71:11, 73:11, 73:18 <b>huge</b> 26:13 <b>human</b> 59:5 <b>husband</b> 51:5, 51:13, 51:16 <b>hygiene</b> 21:16, 21:18 <hr/> I <hr/> <b>i'll</b> 24:5, 24:8 <b>i've</b> 14:10, 66:18, 66:19, 69:5 <b>idea</b> 29:13, 49:1, 57:13, 64:21 <b>identified</b> 68:17
--	--	--	---

Transcript of Melissa Hope Shachnovitz  
 Conducted on January 19, 2018

<p><b>image</b>                  43:6, 43:9,                  43:10, 43:11,                  44:4</p> <p><b>imagine</b>                  9:14, 15:10,                  54:11, 57:20,                  65:12, 71:16,                  77:5</p> <p><b>imagined</b>                  72:4</p> <p><b>immediately</b>                  35:5</p> <p><b>implant</b>                  49:4</p> <p><b>important</b>                  40:15</p> <p><b>improve</b>                  22:3</p> <p><b>in-office</b>                  41:22, 43:2</p> <p><b>incentives</b>                  72:5</p> <p><b>incident</b>                  33:7, 34:7,                  36:4, 36:11,                  36:16</p> <p><b>incidents</b>                  38:13</p> <p><b>include</b>                  46:22, 47:3</p> <p><b>independent</b>                  6:13, 17:5,                  17:7, 55:17</p> <p><b>independently</b>                  42:13</p> <p><b>individual</b>                  42:22</p> <p><b>individuals</b>                  41:18, 43:21,                  45:7, 61:11</p> <p><b>induce</b>                  46:14</p> <p><b>industry</b>                  8:6, 11:1</p> <p><b>information</b>                  5:21, 73:18</p> <p><b>informed</b>                  57:16, 58:5</p>	<p><b>initiated</b>                  11:19</p> <p><b>injection</b>                  46:10</p> <p><b>inspections</b>                  20:21</p> <p><b>instead</b>                  26:8</p> <p><b>instituted</b>                  48:6</p> <p><b>instructions</b>                  58:9</p> <p><b>insurance</b>                  28:10, 28:12,                  28:13, 28:17</p> <p><b>interact</b>                  51:3, 51:16,                  59:9</p> <p><b>interacted</b>                  30:19, 30:21,                  30:22, 51:15,                  59:12</p> <p><b>interaction</b>                  30:16, 30:21,                  30:22, 31:3,                  31:12, 31:18,                  32:8, 58:17,                  61:22</p> <p><b>interactions</b>                  59:14, 59:15</p> <p><b>interest</b>                  79:10</p> <p><b>interject</b>                  24:1</p> <p><b>interview</b>                  12:2</p> <p><b>interviewed</b>                  12:6, 12:9,                  70:22</p> <p><b>intimately</b>                  59:22</p> <p><b>into</b>                  9:22, 21:6</p> <p><b>intrauterine</b>                  49:10, 49:20</p> <p><b>introduces</b>                  70:2</p> <p><b>introduction</b>                  70:11</p>	<p><b>investigation</b>                  34:13</p> <p><b>involved</b>                  31:19, 32:8,                  37:8, 59:18,                  59:22, 60:15,                  65:6, 72:2, 75:7</p> <p><b>involvement</b>                  38:15, 38:19</p> <p><b>involves</b>                  20:20</p> <p><b>involving</b>                  50:7, 50:21</p> <p><b>irrelevant</b>                  7:18</p> <p><b>issue</b>                  33:13, 34:17,                  35:10, 66:20,                  66:21, 76:11</p> <p><b>issues</b>                  14:4, 14:12,                  19:1, 32:4,                  32:6, 32:11,                  38:13, 38:18,                  50:6, 50:20,                  59:5, 59:6,                  61:1, 65:9,                  66:19</p> <p><b>it's</b>                  9:13, 10:9,                  21:13, 21:15,                  37:13, 40:2,                  40:15, 47:18,                  51:10, 52:7,                  68:4, 69:11,                  77:14</p> <p><b>its</b>                  79:11</p> <p><b>itself</b>                  20:14</p> <hr/> <p style="text-align: center;"><b>J</b></p> <hr/> <p><b>january</b>                  1:13, 17:6,                  79:14, 79:16</p> <p><b>jcaho</b>                  20:18</p> <p><b>jersey</b>                  12:17, 14:3,</p>	<p>14:12, 19:5,                  19:6, 22:9,                  23:3, 23:4,                  23:14, 24:11,                  25:1, 48:21,                  67:20, 68:9,                  68:12, 69:3,                  69:8, 69:9,                  69:11, 71:1,                  71:5, 71:7,                  72:1, 73:9,                  73:14, 73:19,                  74:11, 76:3,                  76:6, 76:8</p> <p><b>jfm-</b>                  1:6</p> <p><b>job</b>                  1:20, 9:16,                  10:8, 16:9,                  21:20, 67:13,                  71:9</p> <p><b>join</b>                  39:18</p> <p><b>joined</b>                  65:8, 65:16,                  67:7, 71:6, 72:3</p> <p><b>just</b>                  5:8, 5:17,                  5:20, 6:7, 6:8,                  6:21, 8:7, 11:9,                  16:8, 17:5,                  17:18, 18:3,                  23:20, 25:6,                  25:15, 25:17,                  26:9, 26:19,                  26:20, 27:16,                  36:3, 36:9,                  37:1, 37:17,                  38:17, 40:11,                  43:5, 43:11,                  45:3, 51:19,                  51:20, 53:2,                  58:7, 59:1,                  59:2, 60:19,                  60:20, 62:12,                  63:10, 67:3,                  67:8, 67:16,                  69:11, 75:3,</p>
--	---	---	---



Transcript of Melissa Hope Shachnovitz  
 Conducted on January 19, 2018

<p>75:12, 75:19, 76:11</p> <hr/> <p style="text-align: center;"><b>K</b></p> <hr/> <p><b>keep</b> 67:10</p> <p><b>keeping</b> 26:8, 72:5</p> <p><b>kelly</b> 25:13, 25:20, 25:21, 44:8</p> <p><b>kept</b> 77:1</p> <p><b>kiersi</b> 55:2, 55:5, 67:12, 67:19</p> <p><b>kim</b> 25:19</p> <p><b>kimberly</b> 15:4, 15:5</p> <p><b>kind</b> 6:21, 10:22, 15:11, 18:3, 19:11, 20:10, 47:8, 47:12, 48:8, 53:5, 55:2, 55:3, 55:5, 59:1, 59:3, 62:20, 72:4, 72:16, 72:21, 73:1, 76:16</p> <p><b>klein</b> 9:5, 9:10, 70:2</p> <p><b>klein's</b> 10:10, 12:5, 72:14</p> <p><b>knew</b> 11:6, 11:11, 11:16, 28:22, 54:1, 55:5, 55:18, 76:16, 76:17, 76:20</p> <p><b>knowledge</b> 9:7, 16:5, 48:22, 57:2</p> <p><b>knows</b> 9:10</p>	<p style="text-align: center;"><b>L</b></p> <hr/> <p><b>lab</b> 63:8</p> <p><b>laboratory</b> 42:2, 63:14</p> <p><b>lady</b> 73:21</p> <p><b>laid</b> 10:13</p> <p><b>lane</b> 6:10</p> <p><b>last</b> 25:14, 26:18, 26:20, 29:10, 38:3, 76:13, 76:14</p> <p><b>later</b> 8:9, 46:13, 46:16</p> <p><b>law</b> 2:2</p> <p><b>lawsuit</b> 6:1, 55:9</p> <p><b>lawyer</b> 13:11</p> <p><b>lawyers</b> 74:16</p> <p><b>learn</b> 54:9</p> <p><b>learned</b> 53:21, 54:2</p> <p><b>least</b> 14:10, 44:21, 45:4, 75:22</p> <p><b>leave</b> 66:14, 69:22</p> <p><b>leaving</b> 37:3</p> <p><b>led</b> 34:13</p> <p><b>left</b> 37:9, 37:11, 37:15, 39:3, 53:5, 55:1, 61:21, 67:11, 67:14, 69:19, 72:14, 74:18,</p>	<p>75:4, 75:6, 75:10, 75:13</p> <p><b>left-hand</b> 29:2</p> <p><b>legal</b> 37:9</p> <p><b>less</b> 46:8</p> <p><b>let</b> 19:22, 21:13, 24:7, 25:8, 25:10</p> <p><b>let's</b> 18:12, 25:18, 50:16, 73:11, 76:16</p> <p><b>letter</b> 52:19</p> <p><b>level</b> 37:14, 42:6, 75:1</p> <p><b>lewis</b> 29:11, 29:12, 68:17, 77:7</p> <p><b>license</b> 20:3</p> <p><b>licensed</b> 7:4, 19:9, 20:3, 20:6, 20:7, 21:2, 21:6, 32:14, 40:5, 63:4, 65:19, 71:17, 72:6</p> <p><b>licenses</b> 21:12, 32:16, 32:18, 37:2, 37:10, 37:18, 38:21, 38:22, 39:3, 39:8, 41:2, 75:2</p> <p><b>licensure</b> 19:22, 21:20, 43:17, 43:22, 45:19, 75:8, 75:11</p> <p><b>life</b> 24:2</p>	<p><b>like</b> 7:14, 8:14, 11:10, 21:9, 22:1, 27:21, 29:1, 38:20, 43:20, 53:13, 53:18, 55:3, 58:7, 58:21, 59:3, 59:21, 70:21, 74:12, 75:3, 76:22</p> <p><b>likely</b> 37:14</p> <p><b>list</b> 57:9, 57:12</p> <p><b>literally</b> 75:3, 75:12</p> <p><b>little</b> 6:8, 7:15</p> <p><b>live</b> 29:12, 52:18, 67:19, 69:2</p> <p><b>lived</b> 69:8, 69:14, 69:17, 76:2, 76:6</p> <p><b>living</b> 24:22, 76:7</p> <p><b>llc</b> 3:4, 6:15, 6:16, 6:18</p> <p><b>local</b> 73:7, 73:20</p> <p><b>located</b> 23:14</p> <p><b>location</b> 12:13, 44:20, 52:3, 71:1</p> <p><b>locations</b> 7:8, 9:22, 12:11, 12:14, 15:22, 25:22, 26:5, 30:1, 44:16, 45:5, 67:6</p> <p><b>logistics</b> 60:22</p> <p><b>long</b> 6:6, 9:20,</p>
---	--	---	---

Transcript of Melissa Hope Shachnovitz  
 Conducted on January 19, 2018

17:3, 26:6, 32:13, 32:14, 36:15, 56:16, 56:19, 57:20 <b>longer</b> 17:19 <b>look</b> 37:21, 47:13, 53:11, 59:2 <b>looked</b> 53:13, 53:16, 53:18 <b>looking</b> 20:10, 25:17 <b>lost</b> 37:10 <b>lot</b> 19:16, 25:3, 25:14, 34:20, 35:6, 65:11, 67:8 <b>love</b> 10:12 <b>luke</b> 29:11, 29:12, 68:17 <b>luke's</b> 77:7 <hr/> <p style="text-align: center;"><b>M</b></p> <hr/> <b>machine</b> 74:7 <b>made</b> 19:10, 34:15, 45:6, 62:12 <b>main</b> 2:5 <b>maintain</b> 7:11, 19:22 <b>maintaining</b> 19:20 <b>major</b> 8:17 <b>make</b> 7:13, 19:3, 32:1, 32:3, 59:3, 72:6, 77:14	<b>makes</b> 70:10 <b>making</b> 20:11, 61:1, 61:6 <b>malarkey</b> 3:3, 4:3, 5:7, 5:9, 62:9, 62:11, 77:10 <b>man</b> 27:6 <b>management</b> 6:17, 7:4, 7:10, 8:9 <b>manager</b> 25:21, 31:4, 44:9, 44:10, 44:13, 44:18, 60:11, 60:12, 60:21, 64:11, 66:6, 71:2 <b>managers</b> 14:5, 18:20 <b>many</b> 11:9, 25:12, 67:6 <b>marder</b> 3:4 <b>marked</b> 4:8 <b>marketing</b> 22:2 <b>maryland</b> 1:2, 1:12, 2:6, 2:22, 3:7, 3:14, 12:22, 14:13, 14:18, 14:21, 15:13, 15:14, 15:19, 19:14, 19:16, 20:1, 21:1, 21:11, 21:19, 21:22, 22:10, 22:21, 23:7, 23:9, 24:18, 25:5, 25:11, 30:1, 30:3, 30:6, 30:7, 30:14,	30:17, 31:6, 31:7, 31:9, 31:13, 31:19, 32:9, 36:15, 38:7, 39:14, 39:21, 40:6, 45:7, 45:13, 45:18, 59:19, 60:8, 65:2, 65:5, 65:10, 65:20, 66:11, 67:21, 69:15, 69:17, 71:3, 71:10, 71:13, 71:20, 72:2, 73:7, 73:8, 73:13, 73:16, 73:20, 74:9, 74:16, 74:17, 75:8, 75:11, 76:12, 76:15, 77:2, 79:22 <b>materials</b> 58:7, 58:8, 58:10 <b>matter</b> 47:8 <b>may</b> 5:21, 23:22, 43:9, 43:17, 47:15, 47:17, 49:10, 52:3, 56:3, 77:11, 77:12 <b>maybe</b> 36:8, 54:5, 54:11, 67:13, 67:21 <b>mean</b> 9:13, 11:6, 25:5, 47:10, 51:8, 53:15, 55:9, 58:12, 62:7, 72:20, 76:3 <b>meaning</b> 31:6 <b>means</b> 43:6	<b>medical</b> 7:1, 15:10, 16:3, 39:16, 39:20, 40:3, 41:6, 42:9, 45:11, 45:13, 46:2, 47:11, 48:1, 48:12, 49:17, 49:21, 52:12, 55:18, 55:22, 56:7, 56:10, 56:13, 56:16, 57:8, 57:14, 58:18, 60:9, 60:14, 61:4, 61:6, 61:16, 62:13, 63:7, 63:13, 63:16, 63:22, 64:5, 68:1 <b>medication</b> 33:21, 34:4, 36:14 <b>medicine</b> 65:19 <b>meesa</b> 27:20 <b>meet</b> 63:21, 64:1, 64:6, 70:15, 74:16 <b>meeting</b> 10:20 <b>melissa</b> 1:11, 2:1, 4:2, 5:2, 5:8, 78:2 <b>mental</b> 21:16, 21:17 <b>mention</b> 23:21 <b>mentioned</b> 40:20, 44:8, 74:15 <b>met</b> 5:9, 10:14, 10:17, 10:19, 13:8, 29:15, 67:12, 67:15,
---	---	--	---

Transcript of Melissa Hope Shachnovitz  
 Conducted on January 19, 2018

<p>72:11, 72:12,                  72:13, 72:15,                  72:17  <b>methotrexate</b>                  46:2, 49:2,                  49:5, 49:11,                  52:13  <b>mid</b>                  8:6  <b>mifeprex</b>                  49:9  <b>mifepristone</b>                  48:19, 49:8,                  57:1, 57:11,                  61:16  <b>might</b>                  28:8, 36:2,                  36:3, 37:4,                  55:1, 76:21  <b>miscarriage</b>                  46:14  <b>misoprostol</b>                  46:12, 46:13,                  48:12  <b>misspeak</b>                  60:20  <b>modifications</b>                  19:2  <b>mogul</b>                  10:22  <b>moment</b>                  50:16  <b>money</b>                  33:12, 34:2  <b>month</b>                  37:4  <b>months</b>                  67:13  <b>moorestown</b>                  7:8, 25:6  <b>more</b>                  18:8, 39:15,                  51:5, 52:2,                  59:12, 59:16,                  59:17, 59:18,                  60:15, 61:5  <b>most</b>                  7:20, 28:21,</p>	<p>28:22  <b>mostly</b>                  69:1  <b>mouth</b>                  60:19  <b>moved</b>                  69:20  <b>much</b>                  24:17, 38:3,                  40:12, 55:19,                  59:17  <b>multiple</b>                  12:11, 26:5,                  26:14  <b>mutual</b>                  11:13  <b>myron</b>                  27:3, 27:4,                  27:5  <b>myself</b>                  6:14, 6:20,                  12:4, 21:9</p> <hr/> <p style="text-align: center;"><b>N</b></p> <hr/> <p><b>n-e-e-s-a</b>                  27:19  <b>name</b>                  5:10, 5:15,                  6:16, 8:20,                  26:18, 27:2,                  27:19, 28:7,                  29:10, 38:2,                  38:3, 41:8,                  51:22, 66:7  <b>named</b>                  55:2  <b>names</b>                  25:14, 26:20,                  76:13, 76:14,                  76:20  <b>nancy</b>                  29:8, 29:12,                  29:20, 68:17,                  72:9, 77:7  <b>nancy's</b>                  29:10  <b>naturally</b>                  23:22</p>	<p><b>necessarily</b>                  74:3  <b>necessary</b>                  47:15  <b>need</b>                  19:3, 33:13,                  52:2, 71:8,                  77:11  <b>needed</b>                  21:9, 52:4,                  53:3  <b>needs</b>                  7:3, 52:1  <b>neesa</b>                  27:19  <b>neither</b>                  79:9  <b>never</b>                  8:19, 10:17,                  10:19, 11:7,                  30:3, 43:8,                  51:12, 53:7,                  66:19, 69:5,                  75:6, 76:5  <b>nevertheless</b>                  42:22, 45:9,                  45:20  <b>new</b>                  12:17, 14:3,                  14:12, 19:5,                  19:6, 22:9,                  23:3, 23:4,                  23:14, 24:11,                  25:1, 25:6,                  39:6, 48:21,                  67:20, 68:9,                  68:12, 69:3,                  69:8, 69:9,                  69:11, 71:1,                  71:5, 71:7,                  72:1, 73:9,                  73:14, 73:19,                  74:11, 76:3,                  76:6, 76:8  <b>newspaper</b>                  37:17, 53:12  <b>next</b>                  37:14, 75:1</p>	<p><b>niche</b>                  9:13, 10:9  <b>nine</b>                  46:8  <b>non</b>                  42:7  <b>non-physician</b>                  41:13  <b>non-registered</b>                  42:21  <b>nonsurgical</b>                  37:1, 37:5,                  75:17  <b>nor</b>                  57:3, 71:21,                  79:9  <b>normal</b>                  24:2  <b>normally</b>                  51:9  <b>not</b>                  5:21, 8:16,                  13:9, 19:8,                  20:2, 20:7,                  21:6, 22:22,                  24:8, 24:12,                  26:20, 28:13,                  28:21, 30:7,                  30:15, 32:13,                  32:14, 33:13,                  33:14, 34:2,                  34:10, 36:2,                  41:19, 42:8,                  42:18, 42:19,                  43:17, 45:7,                  45:10, 45:19,                  47:22, 48:14,                  48:16, 48:18,                  48:22, 49:13,                  49:14, 50:9,                  50:10, 51:1,                  52:16, 52:17,                  55:13, 56:2,                  56:3, 56:11,                  56:22, 57:2,                  57:3, 57:7,                  57:11, 57:19,                  58:6, 60:18,</p>
---	---	--	---

Transcript of Melissa Hope Shachnovitz  
 Conducted on January 19, 2018

<p>61:12, 61:16,                  62:3, 62:4,                  62:5, 62:7,                  63:1, 63:4,                  63:6, 63:8,                  63:19, 65:15,                  65:16, 65:19,                  66:1, 66:10,                  66:13, 67:21,                  67:22, 71:21,                  74:6, 75:9,                  76:9, 77:12,                  79:8  <b>notarial</b>                  79:13  <b>notary</b>                  2:21, 79:21  <b>nothing</b>                  5:4, 43:6, 71:6  <b>notice</b>                  2:20  <b>now</b>                  8:4, 11:13,                  12:12, 18:3,                  18:4, 18:7,                  28:2, 53:6,                  59:2, 76:10  <b>number</b>                  11:22, 22:12,                  22:14, 22:16,                  23:11, 23:13,                  73:8, 73:13  <b>numbers</b>                  22:22  <b>nurse</b>                  27:13</p> <hr/> <p style="text-align: center;"><b>o</b></p> <hr/> <p><b>o'connell</b>                  1:4, 5:11,                  50:17, 52:10,                  54:21  <b>o'connell's</b>                  53:22, 54:16,                  55:8  <b>ob</b>                  13:1, 14:14,                  14:16, 15:2,</p>	<p>15:7, 15:18,                  16:7, 16:9,                  18:14, 19:18,                  22:12, 23:10,                  23:11, 24:17,                  28:6, 28:15,                  28:20, 29:5,                  29:22, 30:18,                  38:12, 41:5,                  42:21, 43:21,                  45:17, 46:1,                  48:11, 49:14,                  50:8, 50:22,                  52:11, 54:14,                  54:21, 55:10,                  61:10, 65:2,                  66:7, 66:14,                  68:18, 73:13,                  76:1  <b>observe</b>                  30:16  <b>obviously</b>                  35:5, 39:16,                  40:1, 72:5  <b>occasion</b>                  45:18, 51:14  <b>occurred</b>                  30:10  <b>odd</b>                  28:9, 52:7,                  52:8  <b>off</b>                  5:9, 24:7,                  24:12, 28:1,                  42:12, 43:7,                  43:14, 52:1,                  62:9, 62:10,                  62:12, 77:18  <b>offered</b>                  20:8, 57:3  <b>office</b>                  7:3, 12:3,                  19:3, 22:15,                  25:21, 26:7,                  26:10, 34:19,                  38:9, 43:1,                  44:9, 44:10,                  44:13, 44:18,</p>	<p>51:14, 51:15,                  52:1, 54:4,                  57:4, 65:10,                  71:2  <b>officer</b>                  79:2  <b>offices</b>                  2:2, 11:1,                  11:3, 11:6,                  11:7, 14:3,                  14:16, 14:18,                  14:21, 15:13,                  15:14, 15:19,                  18:20, 19:5,                  19:14, 23:16,                  23:17, 26:15,                  33:17, 34:14,                  36:9, 36:12,                  36:13, 54:14,                  68:7, 68:10,                  72:6, 73:22,                  75:16  <b>officially</b>                  17:7  <b>often</b>                  18:19, 25:5,                  26:4, 26:14,                  28:22, 32:15,                  32:19, 33:1,                  39:5, 39:14,                  51:5, 52:7,                  58:20, 60:1,                  69:6  <b>oh</b>                  10:12, 27:12,                  29:13, 54:3,                  59:17, 62:7  <b>okay</b>                  5:8, 5:12,                  6:19, 7:2, 7:5,                  8:2, 9:3, 9:12,                  10:1, 10:16,                  12:18, 13:7,                  13:21, 14:6,                  14:10, 15:4,                  16:6, 18:12,                  19:17, 19:21,                  21:19, 22:5,</p>	<p>22:17, 24:9,                  24:16, 25:3,                  25:16, 26:2,                  26:16, 27:22,                  28:4, 29:14,                  29:16, 29:19,                  36:20, 41:4,                  41:15, 42:14,                  44:3, 44:8,                  44:15, 45:1,                  49:14, 49:19,                  50:2, 50:15,                  52:9, 55:7,                  56:5, 58:17,                  59:8, 59:14,                  60:18, 61:9,                  63:17, 64:4,                  65:22, 68:6,                  70:6, 73:5,                  74:15, 75:18,                  77:1, 77:10,                  77:16  <b>old</b>                  62:16, 62:17,                  62:20  <b>once</b>                  10:11, 24:3,                  29:15, 34:1,                  36:6, 53:10,                  53:15, 72:3  <b>one</b>                  8:14, 10:9,                  11:15, 14:7,                  21:14, 23:21,                  29:11, 30:10,                  30:11, 33:3,                  33:4, 35:15,                  35:16, 35:17,                  38:20, 39:2,                  40:17, 52:19,                  70:7, 70:21,                  71:19  <b>ones</b>                  48:20  <b>online</b>                  53:11, 74:12  <b>only</b>                  18:2, 19:5,</p>
--	--	---	---

Transcript of Melissa Hope Shachnovitz  
 Conducted on January 19, 2018

<p>30:8, 37:5,                  49:9, 65:7,                  75:16, 76:16,                  76:17, 76:19  <b>open</b>                  72:7  <b>operate</b>                  63:8, 68:22  <b>operated</b>                  47:12, 63:16  <b>operates</b>                  17:16  <b>operating</b>                  41:3, 64:22,                  66:7, 72:1,                  75:16  <b>operations</b>                  40:6, 54:15,                  59:19, 60:22,                  70:2  <b>opportunities</b>                  70:21, 72:16  <b>opportunity</b>                  5:20, 13:10,                  70:22, 71:3,                  71:4, 71:12,                  71:15  <b>orally</b>                  46:9  <b>order</b>                  57:11, 59:4  <b>organization</b>                  71:6  <b>original</b>                  52:21, 53:4  <b>originated</b>                  57:12  <b>other</b>                  9:22, 12:14,                  15:18, 19:21,                  21:20, 23:20,                  25:7, 25:9,                  25:22, 27:8,                  27:10, 27:12,                  27:17, 32:6,                  32:7, 39:6,                  39:9, 39:19,                  39:20, 40:5,</p>	<p>40:9, 40:13,                  47:9, 48:4,                  48:19, 50:3,                  50:6, 50:20,                  56:6, 60:5,                  63:6, 68:1,                  68:2, 72:14,                  76:20  <b>others</b>                  68:8  <b>otherwise</b>                  79:11  <b>our</b>                  13:5, 22:2,                  22:21, 26:4,                  26:6, 39:2,                  77:14  <b>out</b>                  8:16, 28:22,                  54:7, 54:8,                  58:14, 62:1,                  63:3, 63:15,                  68:22, 72:16  <b>outcome</b>                  79:11  <b>outside</b>                  20:18, 25:6,                  49:3, 51:15,                  76:7  <b>over</b>                  19:11, 20:11,                  23:21, 34:20,                  40:6, 55:3, 64:6  <b>overseeing</b>                  61:5  <b>own</b>                  18:4, 18:10,                  44:18, 68:11  <b>owned</b>                  14:22, 16:2,                  40:3, 64:17,                  68:14, 68:16,                  73:4  <b>owner</b>                  15:2, 32:21,                  38:11  <b>owns</b>                  68:3</p>	<p style="text-align: center;"><b>P</b></p> <p><b>page</b>                  4:2  <b>pages</b>                  1:21  <b>paid</b>                  16:6, 28:11,                  28:14, 28:20,                  29:16, 33:11,                  34:2, 40:1  <b>panah</b>                  27:1, 27:8,                  40:20, 45:15,                  48:7, 55:15,                  55:16, 55:21,                  56:2, 56:9,                  56:13, 58:18,                  58:20, 59:16,                  59:21, 60:4,                  60:8, 60:13,                  61:4, 61:9,                  61:15, 61:19,                  61:22, 62:7,                  62:13, 64:18,                  69:14  <b>paperwork</b>                  59:1  <b>par</b>                  20:12  <b>parenthood</b>                  33:19, 34:12  <b>part</b>                  74:22, 75:2  <b>part-time</b>                  11:15, 11:16  <b>participate</b>                  22:1  <b>parties</b>                  79:10  <b>party</b>                  30:5, 30:7,                  30:14  <b>passed</b>                  50:4, 50:18,                  67:7  <b>patient</b>                  5:14, 22:3,</p>	<p>22:11, 23:9,                  26:6, 32:1,                  33:8, 33:10,                  33:12, 33:14,                  33:16, 33:18,                  33:20, 34:3,                  34:9, 34:11,                  34:15, 34:18,                  35:1, 35:6,                  35:11, 36:1,                  36:8, 42:9,                  44:17, 50:3,                  50:9, 50:10,                  59:4, 63:21  <b>patient's</b>                  46:11, 49:7  <b>patients</b>                  11:9, 22:3,                  22:21, 26:7,                  26:11, 26:12,                  32:1, 36:13,                  39:1, 39:4,                  46:7, 57:14,                  61:19, 62:20,                  63:5, 64:2, 64:6  <b>paychecks</b>                  16:6, 28:5,                  28:8, 28:22,                  29:16, 29:19,                  72:8  <b>peer</b>                  59:3  <b>pelvic</b>                  47:18, 48:2  <b>pending</b>                  55:4  <b>people</b>                  7:20, 24:2,                  25:9, 25:10,                  28:19, 41:11,                  45:18, 61:7,                  76:11, 76:15  <b>per</b>                  26:9  <b>perform</b>                  15:12, 41:13,                  41:21, 43:1,                  44:3, 45:9,</p>
--	---	---	--

Transcript of Melissa Hope Shachnovitz  
 Conducted on January 19, 2018

<p>45:19, 63:11,          63:12, 63:17  <b>performed</b>          39:20, 41:5,          41:18, 43:22,          63:13  <b>performing</b>          47:9, 61:11  <b>perhaps</b>          9:14, 26:11,          36:1, 42:9,          44:4, 47:16,          55:1  <b>period</b>          69:20  <b>person</b>          48:5, 67:13,          70:16, 70:17,          70:21  <b>personally</b>          29:14  <b>personnel</b>          74:4, 77:4  <b>persons</b>          48:5  <b>philadelphia</b>          6:10, 8:7, 25:2  <b>philly</b>          24:22  <b>phone</b>          11:22, 22:15,          23:19, 37:21  <b>phones</b>          8:8, 23:5, 23:7  <b>physical</b>          47:1, 59:5  <b>physically</b>          23:3, 25:11,          30:1, 68:22  <b>physician</b>          32:3, 33:3,          39:3, 42:2,          47:12, 51:17,          56:7, 63:1,          63:4, 63:9,          63:20, 64:3,          64:9, 70:4  <b>physicians</b>          15:9, 15:12,</p>	<p>20:14, 31:1,          31:15, 32:4,          32:17, 38:21,          39:6, 39:10,          39:18, 40:13,          40:14, 41:2,          47:13, 59:2,          60:5, 61:6,          72:3, 76:13  <b>picked</b>          8:17  <b>picture</b>          43:5, 43:13  <b>piggybacking</b>          62:12  <b>place</b>          15:11, 23:4,          33:19, 57:20,          58:12, 74:10  <b>plaintiff</b>          1:5, 3:2, 5:6,          5:10  <b>planned</b>          33:18, 34:11  <b>planning</b>          8:7, 8:18,          8:21, 11:1,          17:1, 21:1,          21:12  <b>plant</b>          59:5  <b>played</b>          60:7  <b>please</b>          24:7, 60:20  <b>plus</b>          8:9, 66:18  <b>point</b>          32:16, 32:18,          35:8, 37:11,          38:20, 39:2,          39:4, 40:18,          52:16, 52:19,          55:5, 61:22  <b>policies</b>          45:22  <b>policy</b>          46:4, 47:7,</p>	<p>49:15, 56:22,          57:2  <b>pool</b>          22:2  <b>position</b>          8:18, 12:12,          42:1, 72:18  <b>positive</b>          51:2  <b>possible</b>          77:15  <b>potentially</b>          18:9, 48:3  <b>practice</b>          7:9, 8:21, 9:6,          12:7, 12:9,          39:18, 45:17,          47:7, 49:15,          61:10, 65:19,          72:15  <b>practices</b>          10:2, 10:11,          12:15, 12:22,          18:5, 46:1,          47:11  <b>practicum</b>          8:13, 8:16  <b>pratt</b>          3:5  <b>predated</b>          45:10, 48:8,          65:15  <b>predates</b>          56:11  <b>predating</b>          65:8  <b>preexisting</b>          66:2  <b>pregnancy</b>          46:8, 46:20,          47:14, 48:3,          49:3, 49:4,          49:5, 49:6,          49:10, 49:12,          49:20, 52:18,          53:22, 57:1  <b>pregnant</b>          33:11</p>	<p><b>premature</b>          52:18  <b>premier</b>          6:17  <b>presumably</b>          49:19  <b>presume</b>          57:15  <b>pretty</b>          59:22  <b>previously</b>          21:5  <b>primarily</b>          26:4  <b>primary</b>          19:19  <b>princeton</b>          7:8, 16:16,          16:18, 16:19,          16:22, 17:3,          17:7, 17:10,          17:13  <b>principal</b>          44:19  <b>prior</b>          10:20, 33:22,          36:14, 45:16,          54:5  <b>private</b>          7:9  <b>probably</b>          24:19, 32:13,          40:19  <b>problem</b>          25:13  <b>procedure</b>          34:5, 34:10,          35:5, 52:13,          64:6  <b>procedures</b>          36:19, 37:1,          37:5, 37:7,          75:17  <b>proceedings</b>          34:6, 37:9,          75:8  <b>process</b>          39:17, 67:17</p>
--	---	---	--

Transcript of Melissa Hope Shachnovitz  
 Conducted on January 19, 2018

<p><b>profitable</b> 18:7</p> <p><b>proper</b> 46:11</p> <p><b>protocol</b> 33:19, 36:13</p> <p><b>provide</b> 15:11, 53:3, 63:21</p> <p><b>provided</b> 10:13, 12:21, 15:9, 53:4</p> <p><b>public</b> 2:21, 79:1</p> <p><b>purpose</b> 5:19</p> <p><b>pursuant</b> 2:20</p> <p><b>put</b> 60:18</p> <hr/> <p style="text-align: center;"><b>Q</b></p> <hr/> <p><b>quad</b> 18:22</p> <p><b>qualifications</b> 41:17</p> <p><b>questioned</b> 52:7</p> <p><b>questions</b> 64:7, 67:14, 77:11, 77:17</p> <hr/> <p style="text-align: center;"><b>R</b></p> <hr/> <p><b>ran</b> 61:1</p> <p><b>rang</b> 23:5, 73:14</p> <p><b>rarely</b> 51:11, 51:12, 51:15</p> <p><b>rate</b> 49:11</p> <p><b>read</b> 65:7, 78:3</p> <p><b>reading</b> 79:8</p> <p><b>ready</b> 69:22</p>	<p><b>real</b> 56:19</p> <p><b>realized</b> 53:12</p> <p><b>really</b> 22:22, 28:9, 37:16, 43:5, 44:22, 47:18, 53:14, 58:11, 64:16, 71:21, 73:3, 76:20, 76:22</p> <p><b>recall</b> 11:21, 23:5, 24:10, 24:14, 25:9, 25:12, 28:5, 32:12, 36:5, 36:9, 39:1, 44:10, 44:19, 45:22, 51:1, 52:12, 52:22, 53:2, 54:3, 54:13, 54:20, 55:13, 58:3, 69:10, 69:17, 76:12, 76:14</p> <p><b>receive</b> 22:11</p> <p><b>received</b> 43:1, 54:12</p> <p><b>receptionist</b> 9:17</p> <p><b>recommendations</b> 47:19, 47:20, 47:22, 48:6</p> <p><b>recommended</b> 47:10</p> <p><b>record</b> 5:9, 62:9, 62:10, 62:13, 77:18, 79:5</p> <p><b>records</b> 52:22, 77:4</p> <p><b>recruit</b> 10:18, 39:6</p> <p><b>reduced</b> 79:7</p>	<p><b>referred</b> 63:2</p> <p><b>referring</b> 12:10, 13:1</p> <p><b>refused</b> 33:7, 33:8, 33:16, 34:3</p> <p><b>registered</b> 42:5, 42:17, 43:3, 43:8, 45:8, 61:12</p> <p><b>registration</b> 42:6, 44:1</p> <p><b>regularly</b> 59:9, 59:22</p> <p><b>regulation</b> 43:17</p> <p><b>regulations</b> 19:2, 19:9, 19:10</p> <p><b>regulatory</b> 7:13, 14:4, 14:12, 19:1, 19:11, 19:13, 19:16, 19:20, 19:21, 21:10, 32:10, 32:22, 33:2, 33:17, 34:6, 35:6, 35:9, 38:13, 38:18, 40:10, 66:17, 66:19, 66:20, 67:3, 73:1, 76:19</p> <p><b>reinspected</b> 36:7</p> <p><b>reinstated</b> 39:8, 41:2</p> <p><b>related</b> 59:11, 79:9</p> <p><b>relating</b> 19:4</p> <p><b>relation</b> 54:15, 60:8</p> <p><b>relationship</b> 15:7, 55:15, 55:20, 56:2, 65:5, 66:3, 77:8</p>	<p><b>relatively</b> 9:13, 58:20, 69:9</p> <p><b>remained</b> 72:7</p> <p><b>remember</b> 11:13, 11:20, 12:6, 25:17, 26:19, 26:20, 27:17, 27:19, 29:10, 32:14, 37:19, 38:3, 67:15, 70:16, 73:9</p> <p><b>reopened</b> 35:20, 35:21, 36:21, 36:22, 37:5</p> <p><b>reopening</b> 74:17</p> <p><b>report</b> 32:5, 36:16</p> <p><b>reported</b> 1:22, 55:16</p> <p><b>reporter-notary</b> 79:1</p> <p><b>reporting</b> 11:10, 32:6</p> <p><b>represent</b> 5:10, 64:2, 64:8</p> <p><b>representatives</b> 22:19, 23:6, 23:7</p> <p><b>reputation</b> 11:11</p> <p><b>requested</b> 79:8</p> <p><b>requesting</b> 54:12</p> <p><b>require</b> 20:13, 20:16, 47:17</p> <p><b>required</b> 20:5, 20:6, 20:7, 20:8, 20:17, 21:1, 46:15, 59:7</p>
---	--	---	---

Transcript of Melissa Hope Shachnovitz  
 Conducted on January 19, 2018

<p><b>research</b> 22:2</p> <p><b>residential</b> 6:9</p> <p><b>resource</b> 59:5</p> <p><b>respect</b> 14:18, 46:1, 47:8, 47:22</p> <p><b>responsibilities</b> 21:21</p> <p><b>responsibility</b> 19:19</p> <p><b>responsible</b> 60:22, 61:5</p> <p><b>restored</b> 38:22</p> <p><b>result</b> 34:7</p> <p><b>retain</b> 18:8, 53:4</p> <p><b>retrieving</b> 38:5</p> <p><b>return</b> 46:15</p> <p><b>review</b> 59:3</p> <p><b>reviewing</b> 59:1</p> <p><b>revision</b> 58:4</p> <p><b>revoked</b> 37:2, 37:18, 75:2, 75:13</p> <p><b>revolved</b> 19:14</p> <p><b>richard</b> 38:2</p> <p><b>right</b> 5:22, 6:2, 7:21, 8:20, 9:19, 10:4, 11:18, 19:19, 20:11, 21:7, 23:12, 28:2, 29:4, 29:6, 37:3, 39:11, 40:8, 40:20,</p>	<p>44:3, 50:19, 55:11, 56:1, 56:4, 57:6, 67:7, 69:18, 69:19, 70:3, 70:14, 71:14</p> <p><b>ring</b> 22:13, 22:18, 23:13, 73:8</p> <p><b>risk</b> 49:7</p> <p><b>rnr</b> 1:22, 2:21</p> <p><b>role</b> 14:13, 40:9, 40:12, 41:9, 55:3, 71:20</p> <p><b>roles</b> 14:11, 60:7</p> <p><b>room</b> 58:13</p> <p><b>rose</b> 27:1, 27:9, 69:16, 69:18</p> <p><b>rose's</b> 27:2</p> <p><b>route</b> 49:3</p> <p><b>routine</b> 47:8</p> <p><b>rpr</b> 1:22, 2:21</p> <p><b>ru</b> 48:12</p> <p><b>rule</b> 23:20</p> <p><b>run</b> 49:6</p> <p><b>running</b> 18:4, 32:8, 60:16, 66:11</p> <p><b>rupturing</b> 49:7</p> <hr/> <p style="text-align: center;"><b>S</b></p> <hr/> <p><b>s</b> 8:5</p> <p><b>s-f</b> 18:22</p>	<p><b>safer</b> 49:3</p> <p><b>said</b> 8:13, 10:12, 22:20, 28:4, 29:5, 33:11, 34:2, 37:12, 38:20, 55:3, 63:11, 66:18, 70:7, 70:16, 70:21, 71:2, 71:12, 73:6, 79:5</p> <p><b>same</b> 18:9, 24:5, 57:22, 74:10, 78:4</p> <p><b>saturday</b> 73:12</p> <p><b>save</b> 51:20</p> <p><b>saw</b> 5:17, 30:3, 34:1, 53:11, 72:3</p> <p><b>say</b> 8:5, 9:14, 12:4, 12:8, 22:14, 23:2, 24:8, 25:8, 31:3, 35:18, 38:8, 42:14, 43:8, 45:12, 46:18, 47:14, 51:11, 51:19, 55:8, 59:16, 70:18, 71:11, 71:15, 71:16, 72:20, 73:11, 76:4, 76:20</p> <p><b>saying</b> 22:20, 53:2</p> <p><b>says</b> 29:2</p> <p><b>schedule</b> 73:15, 74:2, 74:6</p> <p><b>scheduled</b> 26:12, 74:3,</p>	<p>74:4, 74:5</p> <p><b>scheduling</b> 51:10, 53:16, 74:13</p> <p><b>school</b> 63:3</p> <p><b>se</b> 26:9</p> <p><b>seal</b> 79:13</p> <p><b>second</b> 21:14, 23:18, 75:20</p> <p><b>see</b> 22:2, 34:15, 38:9, 49:11, 51:14, 53:17, 59:4, 61:19, 63:5, 64:1, 74:3, 74:15, 76:16</p> <p><b>seeing</b> 32:1, 37:17, 38:22</p> <p><b>separate</b> 18:13</p> <p><b>services</b> 6:17, 15:12, 16:16, 16:20, 16:22, 17:4, 17:14, 20:8, 22:11, 23:9, 47:16, 58:8, 58:14, 58:15, 68:10, 68:11, 71:5</p> <p><b>sessions</b> 26:6</p> <p><b>set</b> 47:7, 47:11, 47:19, 47:22, 48:6, 50:16, 79:12</p> <p><b>settled</b> 53:13, 53:19</p> <p><b>seven</b> 12:16</p> <p><b>several</b> 14:5</p>
---	---	---	--



Transcript of Melissa Hope Shachnovitz  
 Conducted on January 19, 2018

21

<p><b>shachnovitz</b>          1:11, 2:1, 4:2,          5:2, 5:8, 78:2</p> <p><b>she</b>          12:12, 23:10,          23:21, 24:3,          25:20, 26:3,          29:8, 31:4,          33:9, 33:10,          35:2, 39:14,          39:15, 43:9,          50:12, 50:14,          50:15, 50:21,          51:22, 52:1,          52:2, 52:12,          52:18, 60:13,          63:3, 63:4,          63:8, 63:11,          63:12, 63:13,          63:15, 63:17,          63:20, 64:1,          64:2, 64:17,          65:16, 67:14,          68:22, 69:1,          69:2, 69:5,          69:8, 72:22,          73:4, 73:12</p> <p><b>she's</b>          43:8, 47:15,          50:10</p> <p><b>sheet</b>          78:7</p> <p><b>short</b>          36:7</p> <p><b>shorthand</b>          79:1</p> <p><b>should</b>          20:13, 50:1,          70:9</p> <p><b>shoulder</b>          20:11</p> <p><b>shouldn't</b>          51:11</p> <p><b>shut</b>          24:8, 34:13,          35:7</p> <p><b>shuttered</b>          33:17</p>	<p><b>shutting</b>          70:1</p> <p><b>sic</b>          9:17</p> <p><b>sign</b>          42:12, 43:14,          44:6, 57:16</p> <p><b>signature</b>          78:11</p> <p><b>signature-hsoid</b>          79:17</p> <p><b>signed</b>          29:7, 29:8,          29:19, 43:7,          64:7, 72:9, 78:7</p> <p><b>signing</b>          79:8</p> <p><b>signs</b>          63:15</p> <p><b>silver</b>          15:15, 44:13</p> <p><b>since</b>          16:15, 17:18,          28:16, 53:7,          61:21</p> <p><b>sitting</b>          35:2</p> <p><b>situation</b>          52:8</p> <p><b>six</b>          12:16, 67:13</p> <p><b>skills</b>          42:12</p> <p><b>slow</b>          52:2</p> <p><b>small</b>          9:13</p> <p><b>smoothly</b>          61:1</p> <p><b>soften</b>          33:21, 34:4</p> <p><b>software</b>          74:13</p> <p><b>solid</b>          24:19</p> <p><b>some</b>          7:5, 11:12,          12:19, 14:3,</p>	<p>14:11, 15:10,          20:5, 20:6,          20:9, 20:13,          20:15, 22:6,          23:15, 32:10,          32:11, 47:13,          47:17, 49:2,          49:11, 52:16,          53:11, 67:14,          71:8, 72:4,          73:22, 74:1</p> <p><b>somebody</b>          21:9, 43:2,          52:20, 52:21,          55:2</p> <p><b>somehow</b>          66:5</p> <p><b>someone</b>          73:14</p> <p><b>something</b>          44:4, 54:2,          55:4</p> <p><b>sometime</b>          17:12, 54:5,          77:12</p> <p><b>sometimes</b>          20:21</p> <p><b>somewhere</b>          46:16, 67:15,          67:21, 69:19</p> <p><b>son's</b>          67:6</p> <p><b>sono</b>          42:17, 63:7</p> <p><b>sonogram</b>          42:3, 42:4,          42:7, 42:11,          43:14, 44:4,          47:9</p> <p><b>sonograms</b>          41:5, 41:10,          41:11, 41:13,          41:18, 41:21,          42:3, 42:5,          42:13, 43:1,          43:22, 63:11,          63:12</p> <p><b>soon</b>          62:7</p>	<p><b>sorry</b>          16:8, 23:20,          25:5, 27:13,          27:16, 27:20,          49:18, 50:2,          62:8, 63:10</p> <p><b>sort</b>          9:17, 28:9,          35:10, 60:6,          60:22, 63:20,          67:16, 74:12</p> <p><b>sorts</b>          66:17</p> <p><b>sounds</b>          43:20, 59:21</p> <p><b>source</b>          20:18</p> <p><b>speak</b>          13:10, 23:21,          54:18, 55:7</p> <p><b>speaking</b>          24:5, 54:20</p> <p><b>specific</b>          14:8</p> <p><b>specifically</b>          9:14, 11:8,          19:4, 22:14,          22:20</p> <p><b>spend</b>          22:19, 24:18</p> <p><b>spent</b>          22:6, 34:20,          38:3</p> <p><b>spiral</b>          33:17</p> <p><b>spoke</b>          53:10, 53:15,          62:1</p> <p><b>spoken</b>          13:13, 13:16</p> <p><b>spokesperson</b>          51:7, 51:13</p> <p><b>spring</b>          15:15, 44:13</p> <p><b>st</b>          79:13</p> <p><b>staff</b>          23:15, 25:10,</p>
--	--	--	--

Transcript of Melissa Hope Shachnovitz  
 Conducted on January 19, 2018

26:8, 26:11, 26:13, 26:14, 27:12, 30:20, 31:2, 31:9, 39:21, 52:2, 65:2, 74:4, 76:14, 76:15 <b>staffed</b> 31:15 <b>staffing</b> 59:5, 60:16, 61:1 <b>stand</b> 35:22 <b>standard</b> 57:21 <b>standards</b> 20:20 <b>standpoint</b> 61:2 <b>start</b> 6:7, 10:4, 25:18, 33:21, 47:16 <b>started</b> 8:5, 10:15, 13:8, 16:10, 17:7, 18:5, 21:5, 21:8, 36:22, 52:15, 57:22, 64:11 <b>state</b> 2:21, 7:7, 17:8, 17:9, 17:16, 20:10, 20:14, 45:8, 76:8, 79:22 <b>states</b> 1:1, 20:5, 20:6, 20:13, 20:15, 20:16, 42:18, 42:19 <b>status</b> 75:11 <b>stemmed</b> 35:10 <b>stemming</b> 38:13	<b>stenographically</b> 79:6 <b>steven</b> 1:7, 9:8 <b>stick</b> 63:14 <b>still</b> 8:10, 17:10, 18:7, 36:20, 54:4, 54:6, 54:22, 59:22 <b>stock</b> 57:7 <b>stocked</b> 57:4 <b>store</b> 35:3 <b>street</b> 2:5, 3:5, 3:13 <b>stricter</b> 19:9 <b>stuff</b> 19:12, 19:16, 19:20, 19:21, 21:10, 76:19 <b>success</b> 49:11 <b>successful</b> 54:1 <b>successfully</b> 34:11, 49:6, 52:14, 52:17 <b>such</b> 30:8 <b>suite</b> 3:6 <b>summarizing</b> 31:13 <b>superior</b> 37:13, 75:1 <b>supervising</b> 61:5 <b>supervisor</b> 31:9 <b>supplied</b> 51:11 <b>supplies</b> 57:9, 57:10,	60:16 <b>supply</b> 51:22, 57:12 <b>sure</b> 7:13, 7:19, 20:11, 35:18, 38:1, 41:16, 43:12, 43:15, 43:19, 50:9, 59:3, 61:1, 61:14, 61:15, 61:18, 65:15, 65:16, 69:11, 72:6, 77:3, 77:14 <b>surgery</b> 9:16 <b>surgical</b> 9:1, 9:2, 9:4, 9:7, 36:18, 37:2, 37:7, 41:6, 57:15, 63:17, 70:1 <b>suspect</b> 8:6 <b>suspend</b> 67:1 <b>suspended</b> 32:17, 32:18, 37:10, 38:21, 39:2, 39:7, 40:13, 40:15, 40:18, 67:1, 67:2, 75:14 <b>sworn</b> 5:3 <b>system</b> 74:9, 74:10 <hr/> <p style="text-align: center;"><b>T</b></p> <hr/> <b>t-a-b-o-r</b> 6:10 <b>tabor</b> 6:10 <b>take</b> 33:13, 37:13, 40:6, 43:9, 44:4, 46:13,	61:9, 72:18 <b>taken</b> 79:3, 79:6 <b>taking</b> 43:5 <b>talk</b> 13:17, 76:10 <b>talked</b> 48:20, 73:5 <b>talking</b> 14:21, 15:14, 23:2, 40:11, 46:19, 54:15, 75:21 <b>tardy</b> 31:22 <b>tasks</b> 72:22 <b>taylor</b> 11:22, 70:4, 70:10 <b>tech</b> 42:11, 42:17, 43:8, 43:15, 43:16 <b>technically</b> 28:11, 68:15 <b>techs</b> 42:4, 42:7, 42:8, 42:10 <b>telephone</b> 69:7, 70:16 <b>tell</b> 6:8, 7:15, 8:2, 10:7, 11:7, 11:18, 14:10, 18:13, 19:17, 22:10, 26:21, 37:22, 47:21, 50:2, 50:14, 70:8 <b>telling</b> 70:20 <b>temple</b> 7:22, 8:15 <b>terminate</b> 49:6, 49:9 <b>terminated</b> 46:21, 47:14,
---	--	--	---

Transcript of Melissa Hope Shachnovitz  
 Conducted on January 19, 2018

<p>52:14, 52:17  <b>termination</b>                      53:22, 57:1  <b>terms</b>                      31:12  <b>testified</b>                      5:5  <b>testify</b>                      5:4, 75:7  <b>testifying</b>                      74:16  <b>testimony</b>                      78:4, 78:5,                      79:5, 79:6  <b>testing</b>                      47:3, 47:4,                      47:15, 47:17,                      48:3, 63:8,                      63:14  <b>than</b>                      19:9, 19:21,                      32:6, 39:20,                      40:5, 40:13,                      47:9, 50:3,                      56:7, 59:12,                      68:1, 76:21  <b>thank</b>                      6:3, 77:13  <b>that's</b>                      8:17, 10:2,                      21:8, 24:2,                      25:3, 26:20,                      27:22, 28:2,                      29:18, 39:22,                      43:4, 43:11,                      44:7, 44:17,                      44:21, 45:3,                      45:21, 46:14,                      55:4, 61:3,                      61:8, 64:13,                      65:21  <b>their</b>                      7:8, 7:10,                      17:19, 19:9,                      20:20, 22:18,                      33:21, 37:2,                      37:10, 39:7,                      41:20, 42:10,</p>	<p>42:12, 42:16,                      44:18, 46:16,                      54:15, 59:3,                      63:14, 70:2  <b>them</b>                      8:14, 11:8,                      11:9, 17:21,                      18:6, 18:8,                      19:2, 32:5,                      36:14, 42:17,                      43:16, 56:4,                      60:3, 63:21,                      67:15, 72:4,                      76:18, 76:19,                      76:20  <b>themselves</b>                      31:2, 64:8  <b>then</b>                      8:18, 9:21,                      12:20, 19:17,                      20:12, 26:12,                      26:22, 32:15,                      32:17, 34:4,                      34:12, 34:17,                      35:20, 35:21,                      39:1, 42:11,                      42:12, 44:5,                      46:12, 46:15,                      66:22, 67:1,                      71:2, 72:12,                      72:17, 74:8,                      75:1, 75:4  <b>there</b>                      7:12, 12:2,                      12:20, 14:4,                      15:10, 15:18,                      18:21, 19:15,                      19:20, 20:9,                      20:15, 23:1,                      23:4, 23:15,                      23:18, 26:3,                      26:8, 26:9,                      26:12, 26:17,                      26:22, 27:10,                      27:13, 27:18,                      30:5, 30:11,                      30:20, 32:6,                      32:14, 32:17,</p>	<p>33:7, 33:14,                      34:17, 34:18,                      35:12, 37:4,                      38:12, 39:5,                      40:17, 41:11,                      41:22, 42:3,                      42:6, 43:20,                      45:4, 46:10,                      47:7, 47:10,                      47:19, 48:16,                      49:20, 54:6,                      54:22, 55:2,                      56:14, 56:17,                      56:22, 57:2,                      57:9, 57:12,                      58:1, 58:3,                      58:6, 58:12,                      58:14, 59:4,                      60:1, 60:4,                      60:5, 61:11,                      65:12, 65:17,                      66:16, 66:20,                      67:3, 67:4,                      67:5, 67:7,                      71:6, 71:8,                      71:9, 72:4,                      72:16, 73:22,                      74:2, 74:18,                      75:6, 75:9,                      77:1, 77:5  <b>there's</b>                      20:18, 32:15,                      35:6, 65:11,                      71:12  <b>thereafter</b>                      79:7  <b>these</b>                      18:5, 38:12,                      38:13, 40:10,                      57:10, 71:20  <b>they</b>                      9:15, 9:21,                      11:15, 17:8,                      18:2, 19:3,                      19:6, 19:8,                      20:2, 20:3,                      21:5, 21:8,                      22:12, 22:14,</p>	<p>22:22, 26:10,                      32:10, 32:13,                      32:22, 33:20,                      35:20, 36:1,                      36:2, 36:7,                      36:18, 36:20,                      36:22, 37:4,                      37:6, 39:2,                      39:5, 39:15,                      39:22, 40:1,                      40:18, 40:22,                      41:6, 41:12,                      42:8, 42:9,                      42:10, 42:11,                      42:12, 42:14,                      42:15, 43:1,                      43:16, 44:3,                      44:5, 44:18,                      45:12, 46:12,                      46:13, 46:15,                      47:12, 47:21,                      48:14, 48:16,                      49:19, 50:1,                      57:15, 57:17,                      57:21, 64:7,                      64:8, 66:22,                      67:1, 72:7,                      73:15, 73:17,                      74:5, 75:1,                      75:13  <b>they're</b>                      18:4, 25:10,                      70:1  <b>thing</b>                      18:9, 35:9  <b>things</b>                      7:13, 7:14,                      11:10, 20:11,                      22:20, 35:7,                      37:17, 51:10,                      60:17, 65:7,                      66:22  <b>think</b>                      11:12, 12:19,                      15:3, 21:8,                      21:13, 27:16,                      28:1, 28:4,                      30:11, 30:20,</p>
--	--	--	--

Transcript of Melissa Hope Shachnovitz  
 Conducted on January 19, 2018

<p>36:22, 37:3,                  40:14, 53:21,                  54:1, 55:1,                  55:3, 55:6,                  60:4, 64:2,                  65:14, 66:2,                  68:4, 69:8,                  73:3, 74:12,                  75:18, 76:21,                  77:10  <b>thinks</b>                  52:1  <b>this</b>                  6:1, 8:6, 8:10,                  10:13, 15:4,                  17:6, 23:18,                  25:8, 32:12,                  34:2, 34:10,                  34:20, 35:3,                  36:14, 37:11,                  51:10, 51:21,                  52:1, 53:19,                  55:3, 55:4,                  57:10, 64:22,                  66:18, 66:22,                  69:21, 70:9,                  71:2, 71:4,                  71:12, 71:22,                  72:14, 79:10,                  79:13  <b>those</b>                  10:2, 15:21,                  19:4, 20:16,                  29:7, 29:11,                  30:1, 31:16,                  31:19, 32:21,                  33:17, 37:9,                  41:17, 45:18,                  48:6, 57:19,                  58:10, 58:15,                  60:7, 60:17,                  68:7, 72:6,                  77:10  <b>though</b>                  24:3, 27:20,                  53:10, 55:6,                  55:20, 58:16,                  59:21, 64:3,</p>	<p>72:9  <b>thought</b>                  44:5, 50:15,                  62:8, 73:3  <b>thoughts</b>                  75:19  <b>three</b>                  39:2, 46:16  <b>three-week</b>                  46:22  <b>through</b>                  5:18, 9:22,                  10:10, 11:16,                  15:9, 18:21,                  26:10, 28:10,                  28:14, 34:5,                  46:9, 69:6  <b>throughout</b>                  14:5, 15:12  <b>time</b>                  8:14, 16:9,                  18:20, 21:5,                  21:7, 22:6,                  22:19, 24:17,                  24:22, 32:12,                  32:19, 34:20,                  35:3, 36:6,                  37:3, 37:15,                  38:3, 54:22,                  56:14, 56:19,                  58:1, 58:6,                  61:22, 65:9,                  65:15, 66:16,                  69:18, 71:4,                  72:11, 74:21,                  75:6, 75:10,                  75:21, 75:22,                  76:8  <b>times</b>                  23:15, 51:4,                  58:3  <b>title</b>                  14:7, 14:8,                  14:17, 44:10,                  60:10  <b>today</b>                  5:19, 13:11,                  13:14, 13:19,</p>	<p>50:10, 53:16  <b>together</b>                  39:5, 40:17,                  40:22, 72:15,                  72:21  <b>told</b>                  25:18, 50:3,                  50:17, 54:9,                  55:5, 67:12,                  72:16  <b>too</b>                  6:6, 11:13,                  11:16, 52:2  <b>took</b>                  12:12, 18:5,                  43:13, 55:3,                  67:13, 70:22,                  75:1  <b>top</b>                  28:1  <b>touch</b>                  67:10  <b>tough</b>                  44:21  <b>train</b>                  42:7  <b>trained</b>                  42:11, 42:15,                  42:17  <b>training</b>                  41:20, 41:22,                  42:16, 43:2  <b>transcript</b>                  79:4  <b>transcription</b>                  78:5  <b>transition</b>                  67:16  <b>translate</b>                  46:11  <b>translated</b>                  43:11  <b>transmitted</b>                  73:19  <b>transpired</b>                  22:21  <b>travel</b>                  26:11, 66:21</p>	<p><b>traveled</b>                  25:5, 25:22,                  26:5, 26:14  <b>treat</b>                  33:8, 33:10,                  33:12, 33:16,                  39:4, 61:7  <b>treated</b>                  33:15, 33:18,                  34:9  <b>treating</b>                  56:7, 63:1  <b>trial</b>                  77:12  <b>trimester</b>                  33:10  <b>triplet</b>                  34:1  <b>triplets</b>                  33:9, 33:11  <b>trips</b>                  19:10  <b>trouble</b>                  32:10, 32:22,                  33:2, 51:20,                  66:17, 67:4  <b>troubles</b>                  40:10  <b>true</b>                  78:4, 79:4  <b>truth</b>                  5:4, 5:5  <b>try</b>                  24:5, 37:12  <b>trying</b>                  27:16, 27:18,                  39:5, 39:7,                  40:5, 60:6,                  60:18, 60:19,                  71:19  <b>tube</b>                  49:4, 49:7  <b>twice</b>                  29:15, 35:19  <b>two</b>                  7:8, 14:10,                  24:3, 29:11,                  37:4, 38:13,</p>
---	---	---	---

Transcript of Melissa Hope Shachnovitz  
 Conducted on January 19, 2018

<p>46:16, 46:22,                  48:16, 59:18,                  60:7, 69:19  <b>two-ish</b>                  29:21  <b>type</b>                  24:3, 47:1,                  47:3, 63:15  <b>typewriting</b>                  79:7  <b>typically</b>                  20:17, 26:6</p> <hr/> <p style="text-align: center;"><b>U</b></p> <p><b>uh-huh</b>                  18:16, 24:21,                  40:21, 56:20  <b>ultimately</b>                  43:4, 43:14,                  44:6  <b>ultrasonographers</b>                  45:9  <b>ultrasound</b>                  42:8, 43:5,                  43:7, 43:15,                  45:9, 45:20,                  46:20, 47:13,                  48:2, 49:15,                  52:22, 53:3,                  54:12, 61:12  <b>unable</b>                  39:4  <b>under</b>                  49:9, 66:7,                  77:15, 79:7  <b>understand</b>                  14:22, 23:22,                  25:15, 53:14,                  60:6, 60:19,                  63:10, 64:14,                  71:22  <b>understanding</b>                  15:6, 16:2,                  23:8, 31:8,                  31:14, 38:10,                  38:11, 40:2,                  43:16, 52:6,                  55:14, 65:18,</p>	<p>71:19  <b>understood</b>                  24:6  <b>unfortunately</b>                  35:4, 35:9,                  47:19  <b>united</b>                  1:1  <b>university</b>                  7:22  <b>unrelated</b>                  34:20, 34:21  <b>unsuccessful</b>                  54:7, 54:9  <b>until</b>                  17:5, 17:9,                  17:12, 24:4,                  25:4, 43:10  <b>updating</b>                  58:4  <b>upon</b>                  20:8, 20:21,                  47:2, 47:5,                  47:6, 48:3  <b>upper</b>                  29:1  <b>upstairs</b>                  22:18, 22:19,                  23:2, 23:3, 23:5  <b>urine</b>                  47:4  <b>use</b>                  46:4, 56:22,                  57:3, 57:4,                  57:7, 71:12  <b>used</b>                  46:3, 48:19,                  49:1  <b>using</b>                  46:2, 48:12,                  61:16  <b>usually</b>                  20:7, 52:4  <b>uterus</b>                  49:4, 49:13</p> <hr/> <p style="text-align: center;"><b>V</b></p> <p><b>valid</b>                  39:12</p>	<p><b>various</b>                  58:12, 70:20  <b>vernick</b>                  3:12  <b>very</b>                  18:22, 36:7,                  52:7  <b>viewed</b>                  43:6, 43:11  <b>virginia</b>                  12:19, 19:7,                  19:11, 48:21,                  68:4, 68:7, 72:2  <b>visited</b>                  76:18  <b>visiting</b>                  23:5  <b>vital</b>                  63:15  <b>volume</b>                  22:4, 44:17,                  59:4  <b>voorhees</b>                  12:3, 12:8,                  24:11, 24:13,                  24:14, 69:4</p> <hr/> <p style="text-align: center;"><b>W</b></p> <p><b>wait</b>                  24:4  <b>waiting</b>                  33:15, 58:13  <b>walker</b>                  14:2, 15:3,                  15:4, 15:5,                  25:13, 25:18,                  25:19, 27:9,                  31:3, 31:11,                  31:14, 32:21,                  38:10, 38:16,                  39:13, 40:19,                  41:1, 41:10,                  44:12, 45:11,                  59:8, 59:13,                  59:15, 59:16,                  59:20, 60:2,                  60:9, 60:15,                  60:21, 62:22,</p>	<p>63:1, 63:2,                  63:5, 64:10,                  65:1, 65:6,                  66:3, 66:5,                  66:12, 72:12,                  72:13, 72:17,                  72:20, 73:3,                  76:17  <b>walker's</b>                  64:14, 65:15,                  73:2  <b>want</b>                  22:20, 25:8,                  26:19, 33:10,                  51:10, 70:19,                  75:19, 76:11  <b>wanted</b>                  22:11, 23:9,                  47:12  <b>wanting</b>                  41:6  <b>wants</b>                  51:21, 51:22  <b>wasn't</b>                  12:21, 37:14,                  49:1, 53:22,                  56:18, 56:19,                  62:2  <b>way</b>                  20:12, 24:2,                  25:8, 32:9, 65:8  <b>we'll</b>                  16:14, 77:14  <b>we're</b>                  13:19, 14:21,                  15:14, 37:20,                  50:9, 75:18  <b>we've</b>                  48:20, 75:21,                  76:10  <b>week</b>                  24:19, 60:4,                  60:5  <b>weekend</b>                  23:17  <b>weekends</b>                  23:18, 73:7  <b>weeks</b>                  17:18, 33:20,</p>
---	---	---	---

Transcript of Melissa Hope Shachnovitz  
 Conducted on January 19, 2018

<p>36:8, 36:13,                  46:8, 46:16,                  75:3, 75:12  <b>weight</b>                  46:11  <b>well</b>                  7:5, 11:2,                  12:11, 12:16,                  14:1, 18:4,                  18:7, 19:15,                  19:22, 28:7,                  35:22, 38:17,                  38:20, 50:2,                  70:4, 70:20,                  72:11, 73:22,                  74:22  <b>well-known</b>                  11:2  <b>went</b>                  7:22, 8:19,                  12:6, 12:8,                  21:6, 44:21,                  45:4, 56:17,                  63:3  <b>weren't</b>                  26:6  <b>west</b>                  3:5  <b>what</b>                  5:20, 6:8,                  6:16, 6:21,                  7:18, 8:15,                  8:20, 12:9,                  12:14, 13:19,                  14:7, 15:6,                  16:2, 16:19,                  18:13, 18:17,                  19:17, 21:11,                  21:13, 21:20,                  22:12, 22:14,                  22:21, 24:1,                  24:4, 25:17,                  26:19, 30:16,                  31:8, 31:18,                  33:6, 37:1,                  37:16, 38:14,                  38:18, 39:1,                  41:17, 43:9,</p>	<p>43:10, 44:5,                  46:4, 46:14,                  46:19, 47:21,                  47:22, 48:5,                  50:2, 51:8,                  51:19, 52:9,                  52:10, 52:12,                  53:18, 55:5,                  55:9, 55:14,                  55:21, 56:2,                  56:6, 57:11,                  58:17, 58:21,                  60:9, 63:10,                  63:15, 69:17,                  70:18, 71:15,                  75:4, 75:10  <b>what's</b>                  20:4, 55:4  <b>whatever</b>                  37:14, 40:16,                  41:9, 42:1,                  42:10, 43:16,                  52:3  <b>when</b>                  7:11, 8:17,                  10:2, 12:4,                  12:8, 13:7,                  13:21, 14:6,                  16:12, 18:20,                  23:2, 26:10,                  32:10, 32:22,                  36:20, 36:22,                  37:4, 37:9,                  38:12, 38:17,                  40:13, 40:15,                  40:18, 41:4,                  41:5, 42:4,                  42:14, 46:18,                  53:21, 54:6,                  55:1, 55:8,                  56:11, 57:14,                  57:22, 62:1,                  62:13, 64:11,                  65:10, 65:16,                  65:17, 67:7,                  69:22, 71:5,                  71:11, 72:13,                  72:17, 76:18,</p>	<p>77:12  <b>whenever</b>                  33:20, 35:9,                  35:11  <b>where</b>                  6:12, 7:16,                  8:3, 10:8, 11:6,                  11:9, 16:14,                  16:17, 22:2,                  22:13, 28:13,                  29:2, 29:12,                  45:12, 53:19,                  58:15, 60:13,                  67:19, 68:22,                  69:2, 69:5,                  69:12, 69:14,                  71:7, 72:22,                  73:20, 75:13,                  76:1  <b>where's</b>                  22:8  <b>whereof</b>                  79:12  <b>whether</b>                  25:9, 42:1,                  47:21, 48:11,                  49:19, 51:10,                  63:7  <b>which</b>                  12:21, 17:16,                  25:6, 32:12,                  33:4, 33:12,                  34:13, 34:19,                  35:2, 35:15,                  49:8, 59:18,                  65:12  <b>while</b>                  15:17, 18:7,                  20:13, 24:16,                  33:14, 36:18,                  36:19, 38:21,                  39:6, 47:17,                  47:18, 48:10,                  49:10, 50:7,                  50:21, 51:14,                  54:4, 58:18,                  76:10  <b>who</b>                  9:3, 13:4,</p>	<p>13:22, 15:2,                  16:2, 16:6,                  21:4, 22:11,                  22:13, 25:7,                  25:9, 25:11,                  25:20, 28:19,                  29:2, 29:7,                  29:19, 31:8,                  31:9, 37:19,                  39:12, 41:5,                  41:8, 41:12,                  41:18, 42:7,                  43:2, 43:21,                  43:22, 44:10,                  44:19, 45:6,                  45:7, 45:13,                  45:18, 48:5,                  50:3, 50:4,                  50:17, 50:18,                  53:2, 54:9,                  56:9, 57:12,                  57:18, 58:10,                  61:11, 61:12,                  63:20, 64:14,                  64:18, 66:11,                  68:14, 68:15,                  68:17, 70:7,                  70:13, 71:19,                  72:9, 72:19,                  73:2, 74:3,                  76:12, 76:15  <b>who's</b>                  72:1  <b>whoever</b>                  42:16, 70:10  <b>whole</b>                  5:4  <b>whom</b>                  14:22, 42:15,                  79:2  <b>whomever</b>                  43:13, 53:1  <b>whose</b>                  5:10, 31:15,                  57:6  <b>why</b>                  6:7, 21:8,                  32:22, 44:18,</p>
---	---	---	---

Transcript of Melissa Hope Shachnovitz  
 Conducted on January 19, 2018

<p>48:17, 49:1,                      52:6, 66:14,                      71:19, 71:22  <b>willing</b>                      34:10  <b>willingness</b>                      6:3  <b>win</b>                      37:15  <b>without</b>                      34:9  <b>witness</b>                      64:7, 77:16,                      79:12  <b>woman</b>                      50:17, 73:7,                      73:12  <b>women</b>                      41:5, 68:10,                      68:11  <b>won</b>                      66:22  <b>won't</b>                      6:6  <b>word</b>                      71:13  <b>words</b>                      60:18  <b>work</b>                      6:12, 6:14,                      8:11, 9:20,                      14:3, 14:12,                      17:3, 18:7,                      18:12, 18:14,                      18:17, 26:1,                      39:13, 49:12,                      56:17, 58:21,                      63:13, 70:9,                      70:19  <b>worked</b>                      8:21, 9:21,                      10:10, 11:14,                      11:15, 14:1,                      16:15, 25:11,                      26:3, 29:21,                      31:9, 43:21,                      54:14, 56:4,                      56:14, 58:1,</p>	<p>58:20, 59:16,                      70:5, 72:21,                      76:12, 76:15  <b>working</b>                      7:7, 8:7, 10:4,                      11:15, 22:19,                      23:6, 39:5,                      39:9, 40:14,                      40:16, 40:22,                      41:4, 42:2,                      45:16, 48:10,                      54:5, 54:22,                      74:18, 76:19  <b>works</b>                      22:10, 52:2  <b>would</b>                      8:5, 9:14,                      10:12, 15:11,                      15:12, 18:19,                      19:1, 19:3,                      19:6, 22:12,                      22:13, 22:15,                      22:18, 22:20,                      23:10, 23:13,                      23:16, 26:7,                      26:9, 26:11,                      32:1, 32:2,                      32:4, 32:15,                      32:19, 33:20,                      33:21, 37:14,                      38:8, 38:9,                      39:13, 39:18,                      41:6, 42:7,                      42:10, 42:11,                      42:12, 42:14,                      42:20, 42:22,                      44:3, 44:6,                      46:4, 46:10,                      46:13, 46:14,                      48:8, 49:5,                      49:9, 49:12,                      49:19, 51:9,                      51:14, 51:16,                      51:19, 52:4,                      52:15, 54:11,                      56:21, 57:11,                      57:14, 57:20,                      58:16, 58:21,</p>	<p>59:1, 59:6,                      59:16, 60:4,                      63:12, 63:14,                      63:20, 63:21,                      64:1, 64:2,                      65:12, 66:22,                      71:16, 72:20,                      73:7, 73:8,                      77:5, 77:6  <b>wouldn't</b>                      63:17, 64:8,                      71:8, 74:3  <b>write</b>                      44:4  <hr/> <p style="text-align: center;"><b>y</b></p> <hr/> <b>yeah</b>                      7:21, 8:11,                      12:3, 19:15,                      30:11, 38:1,                      39:13, 46:6,                      51:4, 68:13,                      69:9, 74:20,                      77:5  <b>year</b>                      8:15, 17:6,                      30:12, 69:20  <b>years</b>                      8:9, 18:6,                      27:21, 29:21,                      48:16, 53:1,                      56:18, 56:21,                      66:19  <b>yes</b>                      5:18, 6:5,                      15:5, 17:2,                      21:17, 21:18,                      23:4, 23:15,                      23:19, 24:14,                      27:7, 28:18,                      29:6, 29:18,                      30:12, 31:7,                      31:17, 35:22,                      37:20, 38:8,                      40:4, 41:14,                      41:16, 49:16,                      49:18, 53:17,                      54:3, 56:15,</p>	<p>57:17, 58:2,                      59:10, 59:17,                      60:1, 61:14,                      61:18, 61:20,                      70:17, 73:10,                      73:17  <b>york</b>                      25:6  <b>you'd</b>                      74:6  <b>you're</b>                      13:1, 20:5,                      20:6, 20:7,                      23:2, 30:10,                      40:15, 40:16,                      46:5, 65:12,                      69:11, 70:7  <b>you've</b>                      40:11, 50:3,                      50:17, 76:12  <b>young</b>                      2:4  <b>your</b>                      6:3, 6:9, 6:16,                      7:3, 7:6, 7:15,                      8:2, 9:3, 9:7,                      9:16, 13:22,                      14:7, 14:17,                      15:6, 16:2,                      16:6, 16:9,                      18:2, 18:10,                      18:12, 18:14,                      19:13, 20:11,                      23:8, 28:5,                      29:16, 29:19,                      31:8, 31:13,                      33:1, 38:10,                      38:11, 40:2,                      42:20, 55:14,                      59:14, 59:15,                      60:19, 65:18,                      71:13, 72:8,                      72:19, 74:2,                      74:7, 74:14,                      77:13  <b>yourself</b>                      6:8, 31:15,                      52:20</p>
--	--	--	---

Transcript of Melissa Hope Shachnovitz  
 Conducted on January 19, 2018

<b>z</b>	67:7, 69:21	<b>6</b>	
<b>z-a</b> 27:14	2014 16:13, 16:15, 17:12, 54:6,	<b>6633</b> 3:8	
<b>z-a-r-a</b> 27:15	66:15, 74:19	<b>7</b>	
<b>zara</b> 27:13	2017 17:13	<b>79</b> 1:21	
<b>0</b>	2018 1:13, 79:14	<b>9</b>	
<b>00</b> 1:14	2021 79:16	<b>90</b> 8:5, 8:6	
<b>1</b>	212		
<b>11</b> 1:14	2:5 21201		
<b>111</b> 3:13	3:7 21401		
<b>1110</b> 6:10	3:14 21921		
<b>12</b> 33:20, 36:13, 77:18	2:6		
<b>13</b> 21:7, 32:13, 54:6	<b>3</b>		
<b>1339</b> 1:6	30 8:14		
<b>14</b> 1:6	300 3:5		
<b>15</b> 77:18	31 17:9, 25:4, 79:13		
<b>173103</b> 1:20	333 3:15		
<b>19</b> 1:13	3900 2:7		
<b>19111</b> 6:11	392 2:7		
<b>2</b>	<b>4</b>		
<b>20</b> 8:9, 66:18	<b>4044</b> 3:15		
<b>2012</b> 9:22, 10:5, 10:20, 11:18, 14:6, 16:10, 21:7, 32:13, 56:12, 64:12,	<b>410</b> 2:7, 3:8		
	<b>443</b> 3:15		
	<b>450</b> 3:6		
	<b>486</b> 48:12		
	<b>5</b>		
	<b>539</b> 3:8		