

- 1 A. I think the initial course was a two-day course  
2 and that was an all day lecture.
- 3 Q. Lecture?
- 4 A. Yes, and then the next think I did was attend  
meetings with other licensed surgeons.
- 5 Q. Do you know when those meetings were?
- 6 A. 1995, the first one was in Houston.
- 7 Q. Did the meetings involve any surgery, actual  
8 performing of procedures using a laser?
- 9 A. No.
- 10 Q. Okay.
- 11 A. This was learning.
- 12 Q. Did you have any training that involved actually  
13 performing the procedure using the laser?
- 14 A. Perform lasik?
- 15 Q. Performing lasik.
- 16 A. I would have to -- there's not a simple answer to  
17 that.
- 18 Q. Why not?
- 19 A. Because we were performing lasik under IDE with  
20 the FDA before there were courses from that.
- 21 Q. What does that mean IDE?
- 22 A. Investigational Device Exemption.
- 23 Q. Okay.

- 1 A. Our laser was built -- let me think how to  
explain this distinctly.
- 2 Q. Okay.
- 3 MS. NEWMAN: Can you read back the  
4 question to which she was to respond to?
- 5 THE WITNESS: What was the question?  
6 (Whereupon the court reporter read  
back the last question.)
- 7 THE WITNESS: Yes.
- 8 BY MR. KAFRISSSEN:
- 9 Q. Okay. Tell me what?
- 10 A. That was in Arizona with Dr. David Dulaney,  
11 D-U-L-A-N-E-Y.
- 12 Q. Okay.
- 13 A. I spent several days with Dr. Dulaney and it was  
14 that combination of practice work for me and watching  
15 him, observing him operating doing lasik.
- 16 Q. Did the meetings that you mentioned in Houston,  
17 there was one meeting, was there other meetings?
- 18 A. Yes, there were others. I can't recall the exact  
19 dates.
- 20 Q. Okay.
- 21 A. There was one in Chicago.
- 22 Q. When did you begin using the lasik procedure,

- 1 you, yourself?
- 2 A. 1995.
- 3 Q. Can you estimate how many lasik procedures you  
4 had performed by March of 1997?
- 5 A. I don't recall.
- 6 Q. Can you estimate how many lasik procedures you  
7 performed in a year say in 1996, the year of 1996?
- 8 A. I don't recall.
- 9 Q. Were you performing more than a hundred a year  
10 when you started doing these?
- 11 A. I don't recall.
- 12 Q. Were you performing more than five a year?
- 13 A. Yes.
- 14 Q. Were are you performing more than a thousand a  
15 year?
- 16 A. No.
- 17 MS. NEWMAN: Off the record.  
18 (Whereupon a discussion was held of  
19 the record.)
- 20 BY MR. KAFRISSSEN:
- 21 Q. Is there any way for you to estimate how many you  
22 performed in a week?
- 23 A. Estimating is hard.
- 24 Q. I know.

- 1 A. I'm afraid I'll guess; I've been told not to  
2 guess. I only want to recount what I recall  
3 specifically.
- 4 Q. Did you perform a lasik procedure every week  
5 since you started performing them, were you performing  
6 at least one a week?
- 7 A. Including vacation time?
- 8 MS. NEWMAN: Not including vacation.
- 9 BY MR. KAFRISSSEN:
- 10 Q. Not including vacation time. When you were in  
11 the office?
- 12 A. When I was in the office, no.
- 13 Q. Were there some weeks say from '95 to '97 where  
14 you were performing more than one lasik procedure a  
15 week?
- 16 A. Yes.
- 17 Q. Do you have any idea as to how many is the most  
18 you ever performed in a week?
- 19 A. 15.
- 20 Q. Okay.
- 21 A. But some weeks, I wasn't performing.
- 22 Q. Okay.
- 23 A. I was performing cataract surgery.
- 24 Q. Okay.