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objectionable when we asked your client that question?
DR. FRIEDMAN: How come it's objectionable when what?
MS. NEWMAN: When we asked your client that question, "Did you report it to the FDA," and you wouldn't let him answer the question.
DR. FRIEDMAN: I'll have to review what he said in his deposition. I'm not going to accept that as your representation.
MS. NEWMAN: Go ahead. We can go on.
Q. I'm sorry. I forget the answer. Was the outcome of his surgery reported to the Food and Drug Administration?
A. Yes.
Q. Where is there an indication that Mr. Morgan's outcome was reported to the Food and Drug Administration?
MS. NEWMAN: Well, I'm going to object only because, again, we're talking about potentially somewhere around 2,000 pages of documents which aren't here, and if you happen to have them, I'm not going to allow her to look through them now anyway. If you want to ask her if it's in the medical

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records that she brought, which is what you asked her to bring with her, then that she can answer.
Q. In the medical record is there any indication of a report to the Food and Drug Administration?
A. Not in the office chart.
Q. Is there any other record that would indicate there was a report to the Food and Drug Administration?
A. There are records of reports to the Food and Drug Administration.
Q. Now, do I understand from what you've told me that you reported the outcome of the LASIK surgery to the Food and Drug Administration, but that such report did not call it either a complication or an adverse event?
A. Correct.
MS. NEWMAN: One second.
(A discussion took place off the record between the witness and Ms. Newman.)
MS. NEWMAN: Go ahead. I'm sorry.
Q. Did you want to add to your answer after . . .
MS. NEWMAN: No. She answered your question. I had a question for her. Go ahead.

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Q. Doctor, at the the bottom of page 1133 and top of 1134 it says under Complications and Adverse Events, "Complications or adverse events that are observed by the investigator or reported by the subject should be recorded on the data collection sheets or in the computerized database for all adverse events, a description of the event, day first observed, any action taken and ultimate outcome will be recorded." Did I read that correctly?
A. (Examines document.) Yes, you read it correctly.
Q. Now, I realize that you're saying that you didn't record this as a complication, what happened to Mr. Morgan; is that correct?
MS. NEWMAN: Or an adverse event.
Q. That was my next question. I understand, Doctor, from what you've said, you don't regard what happened to Mr. Morgan in the two years after his LASIK surgery as either a complication or an adverse event?
MS. NEWMAN: Related to the surgery. That's what she said. You can't leave out that part.

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Q. Related to the surgery. All right. Let's add that.
A. Correct.
Q. Doctor, do you consider this a complication or adverse event, in the two years following his LASIK surgery, as unrelated to his surgery?
MR. LAPAT: Objection.
MS. NEWMAN: No. It's the same objection that I made before in terms of taking words which are defined under FDA protocol and now using them in a confusing and, frankly, not fair manner to the witness. But if you want to ask her about the outcome, go ahead, but not using it in those terms.
Q. Well, what I'm trying to do, it says for all adverse events here, "a description of the event, day first observed, any action taken and ultimate outcome will be recorded." It doesn't say adverse events related to the surgery or not related to the surgery. It just says, "all adverse events."
MS. NEWMAN: You're reading from the protocol; correct?
DR. FRIEDMAN: I am.
MS. NEWMAN: And before you read into