

EXHIBIT K

1 stuff like that.

2 Q. Okay. That was sent to you in the mail?

3 A. Yes.

4 Q. Did your fact sheet come to you in the mail
5 with that stuff?

6 A. I don't remember.

7 Q. Okay.

8 A. No, not with this stuff because they
9 FedEx'd it.

10 Q. I want to go through a couple things in
11 your fact sheet. I'm sure counsel there can help you
12 follow along.

13 I want to start on Page 4. We're
14 going to jump around. Page 4, the letter C in the
15 middle of the page asks you to identify your
16 pharmacies for the past 10 years.

17 Do you see that there?

18 A. Uh-huh.

19 Q. Yes?

20 A. Yes.

21 Q. And you've listed two pharmacies, Walgreens
22 and Wal-Mart; is that right?

23 A. Well, we send away for our medication.

24 Q. Okay. Let me ask my questions and you give
25 me answers, okay? You've listed two pharmacies in

1 response to this, Walgreens and Wal-Mart; is that
2 correct?

3 A. Yes.

4 Q. Are there any other pharmacies not listed
5 on here where you receive prescription medications?

6 A. We send away for it, and I don't know who
7 that is.

8 Q. You don't know who you send away for it
9 from?

10 A. No. My husband takes care of all that.

11 Q. Well, your husband helped you fill out the
12 fact form, correct?

13 A. Just looking up addresses and stuff.

14 Q. But you didn't put on here that you send
15 away for medications, did you?

16 A. No.

17 Q. And you don't know who it is you send away
18 for medications from?

19 A. No.

20 Q. But your husband has that information?

21 A. Yes. We get three months at a time for a
22 month's fee.

23 Q. When did your husband start sending away
24 for your medications?

25 A. Ever since we've been married.

1 Q. Do you submit those for payment to any of
2 your health insurance companies?

3 A. No. We have to pay for one month for three
4 months. You have to pay for your medications.

5 Q. Does your health insurance plan cover
6 medications?

7 A. No.

8 Q. Do you know that for sure, or are you just
9 guessing?

10 A. I don't know.

11 Q. Does your husband know?

12 A. I don't know.

13 Q. Do you have any records in your possession
14 showing that you've ever received medications through
15 this send-away company?

16 A. No.

17 Q. Does your husband have any records showing
18 that you've received prescriptions through this
19 send-away service?

20 A. I don't know. We get them all the time.

21 MR. HOROWITZ: Obviously this will be
22 in our follow-up letter, but I would like to know the
23 name of this pharmacy and any records that they have
24 associated with this pharmacy. This is information
25 that was clearly called for within the fact sheet and

1 also clearly within the scope of information.

2 MS. PARSONS: We will supplement any
3 appropriate discovery requests that have been made.
4 Otherwise, if you're giving me a new request for
5 production during the course of this deposition, I
6 would say I'm going to object to that as the form.

7 MR. HOROWITZ: Obviously this position
8 clearly is not new. It's covered by the fact sheet,
9 it's covered by the request for documents attached to
10 the fact sheet, it's covered by the notice of
11 deposition. Obviously we're not going to solve this
12 dilemma now, so we'll save it for another day.

13 MS. PARSONS: Obviously. Actually,
14 she already testified as to the items that was
15 included not only in the notice of deposition but
16 also those same items that were included as Exhibit A
17 to the notice of deposition are included in Section 8
18 of the fact sheet, and she's indicated that she did
19 not have any of those items in her possession.
20 However, if she is able to locate and produce those
21 items we will, of course, supplement.

22 Q. (By Mr. Horowitz) Okay. Let me ask you
23 about Section 8. It's on Page 5. It's a list of
24 medications.

25 Do you see that there?