

I N D E X

DEPOSITION OF JANE M. HIGHTOWER, M.D.

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MR. PRUTTON	32

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Expert Witness Dr. Hightower	43	
2	Curriculum Vitae	43
3	Photocopy of Dr. Hightower's file	43

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TAKEN AT:

Office Jane M. Hightower, M.D.
 2100 Webster Street, Suite 418
 San Francisco, California 94115

---o0o---

BE IT REMEMBERED that on Wednesday,
 September 21, 2005, commencing at the hour of 1:38 p.m.,
 thereof, pursuant to notice of deposition, before me,
 SANDY M. WALDEN, a Certified Shorthand Reporter in and
 for the State of California, there personally appeared

JANE M. HIGHTOWER, M.D.,

called as a witness by the defendants, who, being by me
 first duly sworn, was thereupon examined and testified
 as hereinafter set forth.

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A P P E A R A N C E S

FOR THE PLAINTIFF:

LAW OFFICE OF DOUGLAS A. PRUTTON
 BY: DOUGLAS A. PRUTTON, ATTORNEY AT LAW
 1866 Clayton Road, Suite 211
 Concord, California 94520
 (925) 677-5080

FOR THE DEFENDANTS:

CLINTON & CLINTON
 BY: LORI L. VIEIRA, ATTORNEY AT LAW
 100 Oceanside, 14th Floor
 Long Beach, California 90802
 (562) 216-5000

FOR DR. HIGHTOWER:

HASSARD BONNINGTON LLP
 BY: RENEE A. RICHARDS, ATTORNEY AT LAW
 Two Embarcadero Center, Suite 1800
 San Francisco, California 94111
 (415) 288-9800

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JANE M. HIGHTOWER, M.D.,
 having been duly sworn or affirmed,
 testified as follows:

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16 Q. We've asked you here today because you've
17 been designated as an expert in the case of Renshaw
18 versus Chicken of the Sea. And we requested that you
19 bring with you numerous documents. Do you have the file
20 of Mr. Renshaw with you today?
21 A. I have the file. And I don't believe I've
22 been disclosed as an expert.
23 MS. RICHARDS: I don't think that
24 Dr. Hightower agreed to be an expert in this case. You
25 may ask her questions about that. She -- her

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1 understanding is that she's being deposed here today as
2 a .treater. She was not given any review, file
3 materials, other than Mr. Renshaw's chart.
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21 Q. Dr. Hightower, today I suppose we will be
22 treating you -- we will be deposing you in your capacity
23 as a treating physician of Jason Renshaw; is that
24 correct?
25 A. Yes.

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Q. How many times have you met with Mr. Renshaw?
A. In-person, twice.

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Q. And at the first examination with
plaintiff -- I'm sorry -- Mr. Renshaw, did you make any
diagnosis?

A. No.

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1 Q. So as of today, you have not made a diagnosis
2 of Mr. Renshaw, is that correct?
3 A. That is correct.
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Q. You have been asked to serve as an expert in this case. Will you be serving as an expert in this case on behalf of Mr. Renshaw?

MR. PROTON: Well, we need to talk about that.

THE WITNESS: No, we haven't talked about it.

MS. RICHARDS: I have advised her not to serve as an expert unless she is given all the materials she feels she needs to render expert opinions on causation, damages, et cetera.

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1 STATE OF CALIFORNIA) ss.
 2 COUNTY OF SAN FRANCISCO)
 3 I, Sandy M. Walden, CSR No. 11940, RPR, a
 4 Certified Shorthand Reporter in and for the State
 5 of California and disinterested person, do hereby
 6 certify:
 7 That prior to being examined, the deponent
 8 named in the foregoing deposition was by me duly
 9 sworn to testify the truth, the whole truth, and
 10 nothing but the truth;
 11 That the said deposition was taken before me
 12 at the time and place therein stated and was
 13 thereafter transcribed into typewriting under my
 14 direction; and I hereby certify that the foregoing
 15 deposition is a true record of the witness'
 16 testimony as reported by me; that the deponent was
 17 given an opportunity to read, correct and sign the
 18 deposition transcript.
 19 I further certify that I am neither counsel
 20 nor attorney for any of the parties hereto or in
 21 any way interested in the event of this case that
 22 I am not related to any of the parties thereto.
 23
 24
 25 SANDY M. WALDEN, CSR No. 11940, RPR

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(Deposition proceedings concluded at 2:40 p.m.)

JANE M. HIGHTOWER, M.D.

1 U.S. Legal Support, Inc.
 180 Montgomery Street, Suite 2100
 2 San Francisco, California 94104
 3
 4 JANE M. HIGHTOWER, M.D.
 2100 Webster Street, Suite 418
 San Francisco, California 94102
 5
 6 Re: Renshaw v. Tri-Union Seafoods, et al.
 Date of Deposition: September 21, 2005
 7
 8 Dear JANE M. HIGHTOWER, M.D.:
 9 The original transcript of your deposition taken in
 10 the above matter is available at this office for your
 11 review. If it is more convenient, you may request to
 12 read one of the copies ordered by the attorneys and
 13 waive signature of the original transcript, notifying
 14 our office by letter sent certified mail of any changes
 15 made, with copies sent to all parties.
 16 In the event you have not read, corrected and signed
 17 your deposition within thirty (30) days of receipt of
 18 this letter, it may be used with the full force and
 19 effect as though it had been read, corrected and signed.
 20
 21 If you have any questions regarding this matter,
 22 please contact this office at the telephone number
 23 below.
 24
 25 Sincerely,
 Sandy M. Walden, CSR No. 11940, RPR
 cc: All Counsel
 Original: Original transcript