

Transcript of the Testimony of
JUANA MACIAS

Date: June 24, 2020

Case: WHITNEY VS. DART

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toomeyrep@sbcglobal.net

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June 24, 2020

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IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

DEMETRIUS WHITNEY,)	
)	
Plaintiff,)	
)	
vs.)	No. 18-cv-4475
)	
FAUZIA KHAN, THOMAS DART,)	
and COOK COUNTY, ILLINOIS,)	
)	
Defendants.)	
)	

This is the CISCO WEBEX deposition of JUANA MACIAS, called by the Plaintiff for examination, taken pursuant to the Federal Rules of Civil Procedure for the United States District Courts pertaining to the taking of depositions, taken before PEGGY A. ANDERSON, a Certified Shorthand Reporter of the State of Illinois, on June 24, 2020, at 10:16 a.m.

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Exhibit D

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2 (Pages 2 to 5)

Page 2	Page 4
<p>1 APPEARANCES:</p> <p>2 THE LAW OFFICES OF:</p> <p>3 THOMAS G. MORRISSEY, LTD.</p> <p>4 BY: MR. THOMAS G. MORRISSEY</p> <p>5 MR. PATRICK MORRISSEY</p> <p>6 10150 South Western Avenue</p> <p>7 Rear Suite</p> <p>8 Chicago, Illinois 60643</p> <p>9 (773) 233-7900</p> <p>10 tgmorrisseylaw@gmail.com</p> <p>11 patrickmorrisey1920@gmail.com</p> <p>12 Appeared on behalf of the</p> <p>13 Plaintiff;</p> <p>14 THE LAW OFFICES OF:</p> <p>15 JOHNSON & BELL, LTD.</p> <p>16 BY: MS. LISA McELROY</p> <p>17 MR. SAMUEL BRANUM</p> <p>18 33 West Monroe Street</p> <p>19 Suite 2700</p> <p>20 Chicago, Illinois 60603-5404</p> <p>21 (312) 372-0770</p> <p>22 mcelroyl@jbltd.com</p> <p>23 branums@jbltd.com</p> <p>24 Appeared on behalf of the</p> <p>Defendants, Cook County and</p> <p>Sheriff Dart;</p> <p>THE LAW OFFICES OF:</p> <p>COOK COUNTY STATE'S ATTORNEY</p> <p>BY: MS. JOI KAMPER</p> <p>50 West Washington Street</p> <p>Suite 2760</p> <p>Chicago, Illinois 60602</p> <p>(312) 603-8600</p> <p>joi.kamper@cookcountyil.gov</p> <p>Appeared on behalf of the</p> <p>Defendant, Dr. Khan.</p>	<p>1 (WHEREUPON, the witness was</p> <p>2 first duly sworn.)</p> <p>3 MR. MORRISSEY: This is the discovery</p> <p>4 deposition of Ms. Macias [pronunciation]</p> <p>5 taken pursuant to notice and continued to</p> <p>6 today's date.</p> <p>7 Ma'am, I'm going to ask you a</p> <p>8 series of questions today in regards to</p> <p>9 your position with Cermak Health --</p> <p>10 actually, in regards to your position with</p> <p>11 Cook County, Stroger. And I'm going to ask</p> <p>12 you to answer my questions orally so the</p> <p>13 court reporter can take down your</p> <p>14 responses.</p> <p>15 If at any time you don't</p> <p>16 understand one of my questions, please stop</p> <p>17 me and I'll try to rephrase the question.</p> <p>18 WHEREUPON:</p> <p>19 JUANA MACIAS,</p> <p>20 called as a witness herein, having been first</p> <p>21 duly sworn, was examined and testified as</p> <p>22 follows:</p> <p>23</p> <p>24</p>
Page 3	Page 5
<p>1 INDEX</p> <p>2 WITNESS PAGE</p> <p>3 JUANA MACIAS</p> <p>4 DIRECT EXAMINATION BY</p> <p>5 MR. THOMAS MORRISSEY: 5-234</p> <p>6</p> <p>7 EXHIBITS</p> <p>8</p> <p>9 EXHIBIT PAGE</p> <p>10 EXHIBIT NO. 13 116</p> <p>11 EXHIBIT NO. 39 107</p> <p>12 EXHIBIT NO. 41 129</p> <p>13 EXHIBIT NO. 150 62</p> <p>14 EXHIBIT NO. 154 149</p> <p>15 EXHIBIT NO. 155 81</p> <p>16 EXHIBIT NO. 159 153</p> <p>17</p> <p>18 *****</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p>	<p>1 DIRECT EXAMINATION</p> <p>2 BY MR. THOMAS MORRISSEY:</p> <p>3 Q Can you state your full name for the</p> <p>4 record, please?</p> <p>5 A Juana Macias.</p> <p>6 Q Ms. Macias, where do you currently</p> <p>7 work?</p> <p>8 A Stroger of Cook County Hospital.</p> <p>9 Q You're going to have to keep your</p> <p>10 voice up because I didn't hear you.</p> <p>11 A Okay. Stroger of Cook County</p> <p>12 Hospital.</p> <p>13 Q Do you work in a specific department</p> <p>14 at Stroger Hospital?</p> <p>15 A Yes.</p> <p>16 Q What department do you work in?</p> <p>17 A Referral support center.</p> <p>18 Q Is there also a central scheduling</p> <p>19 department at Stroger?</p> <p>20 A Yes. It's connected with us.</p> <p>21 Q Do you work in the same office as the</p> <p>22 central scheduling department?</p> <p>23 A Yes.</p> <p>24 Q Do you know who is the manager of the</p>

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<p style="text-align: right;">Page 6</p> <p>1 central scheduling department?</p> <p>2 A His first name is Victor. I cannot</p> <p>3 remember his last name.</p> <p>4 Q How many clerical people work in the</p> <p>5 Cerner -- How many clerical people work in the</p> <p>6 central scheduling department?</p> <p>7 A I don't know how many.</p> <p>8 Q Do you work under Victor in the</p> <p>9 central scheduling department?</p> <p>10 A No.</p> <p>11 Q Is the referral support center a</p> <p>12 separate and distinct department in Stroger?</p> <p>13 A Yes. It's a different manager. It's</p> <p>14 not Victor.</p> <p>15 Q Who is the manager of the referral</p> <p>16 support center?</p> <p>17 A Shivon Bowers.</p> <p>18 Q I didn't hear you, Ms. Macias. Can</p> <p>19 you say that again, please?</p> <p>20 A Shivon Bowers.</p> <p>21 Q Do you work for Mr. Bowers?</p> <p>22 A No. It's Mrs.</p> <p>23 Q I'm sorry. Do you work for</p> <p>24 Mrs. Bowers?</p>	<p style="text-align: right;">Page 8</p> <p>1 referring to?</p> <p>2 A Like oncology, general surgery. They</p> <p>3 have a lot of different clinics. I can't think</p> <p>4 of them now. I don't schedule for them.</p> <p>5 Q To your knowledge, do these two</p> <p>6 nurses schedule for what you classify as the</p> <p>7 difficult clinics at Stroger?</p> <p>8 MS. McELROY: Objection, form. You</p> <p>9 can answer.</p> <p>10 BY THE WITNESS:</p> <p>11 A Some of them. I'm not saying all of</p> <p>12 them. Some of them.</p> <p>13 BY MR. MORRISSEY:</p> <p>14 Q Do you know if the nurses that work</p> <p>15 for the referral support center, do you know if</p> <p>16 they schedule detainees at the jail for</p> <p>17 appointments in the Stroger oral surgery</p> <p>18 department?</p> <p>19 A No, they don't.</p> <p>20 Q No, they don't. Thank you. Now, you</p> <p>21 mentioned that there are four other -- What is</p> <p>22 your title in the referral support center?</p> <p>23 A I'm a clerk.</p> <p>24 Q How long have you been a clerk at</p>
<p style="text-align: right;">Page 7</p> <p>1 A Yes.</p> <p>2 Q Who is your direct supervisor?</p> <p>3 A Shivon Bowers.</p> <p>4 Q How many employees work under</p> <p>5 Ms. Bowers?</p> <p>6 A Six.</p> <p>7 Q Can you name the people that work</p> <p>8 under Ms. Bowers, please?</p> <p>9 A Elpidia Valles, Gloria Gutierrez,</p> <p>10 Bharat Thakrar, Marla Griffith, Monique</p> <p>11 Crawford, Joyce Pascual.</p> <p>12 Q Are all of those individuals clerks</p> <p>13 in the referral support center?</p> <p>14 A No. Four are clerks. Two are</p> <p>15 nurses.</p> <p>16 Q What are the names of the nurses?</p> <p>17 A Monique Crawford, Joyce Pascual.</p> <p>18 Q Do you know what the role of the</p> <p>19 nurses is in the referral support center?</p> <p>20 A Part they do scheduling, they deal</p> <p>21 with difficult clinics, but I really don't know</p> <p>22 what their other duties are.</p> <p>23 Q What -- When you use the word</p> <p>24 "difficult clinics," what clinics are you</p>	<p style="text-align: right;">Page 9</p> <p>1 Stroger?</p> <p>2 A 30 years.</p> <p>3 Q And for the last -- Since 2017 to the</p> <p>4 present, have you been employed as a clerk in</p> <p>5 the referral support center?</p> <p>6 A Yes.</p> <p>7 Q And during that period of time, from</p> <p>8 2017 to the present, have you been the</p> <p>9 principal clerk in the referral support center</p> <p>10 that schedules appointments for the Stroger</p> <p>11 oral surgery clinic?</p> <p>12 MS. McELROY: Objection, form,</p> <p>13 foundation. You can answer.</p> <p>14 BY THE WITNESS:</p> <p>15 A I have been in charge of the Cermak</p> <p>16 detainees. For other patients from the general</p> <p>17 public, any clerk has access to schedule</p> <p>18 patients.</p> <p>19 BY MR. MORRISSEY:</p> <p>20 Q Do the other four clerks in the</p> <p>21 referral support center schedule detainees at</p> <p>22 Cook County Jail for appointments in the oral</p> <p>23 surgery clinic?</p> <p>24 A No. It's just me.</p>

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<p style="text-align: right;">Page 10</p> <p>1 Q Do you at times schedule members of</p> <p>2 the general public for appointments in the oral</p> <p>3 surgery department at Stroger?</p> <p>4 A Yes.</p> <p>5 Q From 2017 to the present, have you</p> <p>6 been -- are you the only clerk that schedules</p> <p>7 detainees at the Cook County Jail for</p> <p>8 appointments in the oral surgery clinic?</p> <p>9 MS. McELROY: Objection to form and</p> <p>10 foundation.</p> <p>11 BY THE WITNESS:</p> <p>12 A Yes.</p> <p>13 THE REPORTER: What was your answer?</p> <p>14 Was it yes?</p> <p>15 THE WITNESS: Yes.</p> <p>16 BY MR. MORRISSEY:</p> <p>17 Q When you're absent from the support</p> <p>18 center, do you know if any other clerk in the</p> <p>19 referral support center schedules detainees</p> <p>20 from the Cook County Jail for appointments in</p> <p>21 the oral surgery clinic?</p> <p>22 MS. McELROY: Objection, form,</p> <p>23 foundation. You can answer.</p> <p>24</p>	<p style="text-align: right;">Page 12</p> <p>1 it.</p> <p>2 BY MR. MORRISSEY:</p> <p>3 Q How much vacation leave do you get</p> <p>4 from the referral support center a year?</p> <p>5 A I get four to five weeks a year.</p> <p>6 Q Is it your practice to take the four</p> <p>7 to five weeks' vacation time each year?</p> <p>8 A Not at the same time.</p> <p>9 Q My question is: During a calendar</p> <p>10 year, do you normally take four to five weeks</p> <p>11 of vacation time?</p> <p>12 A No.</p> <p>13 Q Pardon?</p> <p>14 A No.</p> <p>15 Q How many vacation days a year is it</p> <p>16 your custom to take as a clerk for the referral</p> <p>17 support center?</p> <p>18 A Probably three weeks.</p> <p>19 Q When you take the three week -- Last</p> <p>20 year, did you take three weeks of vacation</p> <p>21 time?</p> <p>22 MS. McELROY: Objection to form. You</p> <p>23 can answer.</p> <p>24</p>
<p style="text-align: right;">Page 11</p> <p>1 BY THE WITNESS:</p> <p>2 A No.</p> <p>3 BY MR. MORRISSEY:</p> <p>4 Q No, they don't?</p> <p>5 A They don't.</p> <p>6 Q How do you know that?</p> <p>7 A Because we don't do that. They have</p> <p>8 their own clinics that they have -- schedule</p> <p>9 for.</p> <p>10 Q But the other clerks also schedule</p> <p>11 people from the general public for appointments</p> <p>12 in the oral surgery clinic; is that true?</p> <p>13 A Yes.</p> <p>14 Q Do you receive any time off for</p> <p>15 vacations from Stroger?</p> <p>16 MS. McELROY: Objection to form.</p> <p>17 BY THE WITNESS:</p> <p>18 A Yes.</p> <p>19 BY MR. MORRISSEY:</p> <p>20 Q Do you have a typical time during the</p> <p>21 year when you take your vacation leave?</p> <p>22 MS. McELROY: Objection to form.</p> <p>23 BY THE WITNESS:</p> <p>24 A No. It's whenever I feel like taking</p>	<p style="text-align: right;">Page 13</p> <p>1 BY THE WITNESS:</p> <p>2 A I don't remember honestly. I never</p> <p>3 take my full four to five weeks. I never take</p> <p>4 it the whole year.</p> <p>5 BY MR. MORRISSEY:</p> <p>6 Q In the year 2019, do you remember</p> <p>7 during what months of the year you took your</p> <p>8 vacation time?</p> <p>9 MS. McELROY: Objection to form and</p> <p>10 relevance.</p> <p>11 BY THE WITNESS:</p> <p>12 A I honestly do not remember.</p> <p>13 BY MR. MORRISSEY:</p> <p>14 Q In addition to vacation time, do you</p> <p>15 also get personal days as a clerk for the</p> <p>16 referral support center?</p> <p>17 MS. McELROY: Objection to form and</p> <p>18 relevance. You can answer.</p> <p>19 BY THE WITNESS:</p> <p>20 A Yes, one.</p> <p>21 BY MR. MORRISSEY:</p> <p>22 Q How many personal days do you receive</p> <p>23 a month as an employee at the referral support</p> <p>24 center?</p>

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<p style="text-align: right;">Page 14</p> <p>1 A Personal days is one. Sick time is 2 like four weeks. 3 Q So each month you receive one 4 personal day? 5 A It's called sick. 6 Q Pardon? 7 A A sick day. 8 Q And is it your practice to take 9 personal days during the course of the year? 10 MS. McELROY: Objection to form and 11 relevance. You can answer. 12 BY THE WITNESS: 13 A When I need it. 14 BY MR. MORRISSEY: 15 Q Okay. Last year in the year 2019, do 16 you know how many personal days you took off 17 from the referral support center? 18 MS. McELROY: Objection to form and 19 relevance. You can answer. 20 BY THE WITNESS: 21 A I don't. 22 BY MR. MORRISSEY: 23 Q You stated that -- How do you know 24 that when you're off either for a personal day</p>	<p style="text-align: right;">Page 16</p> <p>1 foundation. You can answer. 2 BY THE WITNESS: 3 A I don't take my three weeks at the 4 same time. I might take one week in December. 5 Summertime another week. But it's never been 6 three weeks straight. 7 BY MR. MORRISSEY: 8 Q And my question, Ms. Macias, is -- 9 Well, let me ask a preliminary question. 10 In the year 2019, on a daily basis, 11 how many referrals -- Strike that. 12 As a clerk in the referral support 13 center, you schedule oral surgery appointments 14 off a queue? 15 A Can you repeat that? It cut off. I 16 didn't hear. 17 Q I'm sorry. Is there a queue that you 18 use to schedule detainees for oral surgery 19 appointments at Stroger? 20 A Yes. 21 Q On a daily basis -- Strike that. Is 22 the queue found in the Cerner system? 23 A Yes, it's in the Cerner system. 24 Q How do you access the queue?</p>
<p style="text-align: right;">Page 15</p> <p>1 or on vacation none of the other employees in 2 the referral support center schedule detainees 3 for appointments? 4 MS. McELROY: Objection to form and 5 foundation. You can answer. 6 BY THE WITNESS: 7 A We don't do each other's work because 8 we would never be able to catch up with our own 9 work. 10 BY MR. MORRISSEY: 11 Q Last year in 2019, did you take two 12 or three weeks of vacation time? 13 MS. McELROY: Objection, form, asked 14 and answered. You can answer. 15 BY THE WITNESS: 16 A I probably did. 17 BY MR. MORRISSEY: 18 Q When you took, let's say, a week of 19 vacation time in the year 2019, when you came 20 back to work, did you have a backlog of 21 referrals from the Cook County Jail for 22 detainees to be scheduled for the oral surgery 23 clinic? 24 MS. McELROY: Objection to form,</p>	<p style="text-align: right;">Page 17</p> <p>1 MS. McELROY: Objection to form. You 2 can answer. 3 BY THE WITNESS: 4 A There is a tab for power orders, and 5 I go to my first patient and do the complete 6 request. 7 BY MR. MORRISSEY: 8 Q When you say there's a tab under 9 power orders, do you first have to log into the 10 computer? 11 A Yes. 12 Q Tell me how you would log into your 13 desktop computer. 14 A I would go in scheduling. I have a 15 password. 16 Q And once you enter your password, 17 what comes up on your desktop monitor? 18 A The Cerner system. 19 Q Once you've accessed the Cerner 20 system, what do you do next as a scheduler? 21 A I have to log in, into the phone 22 system. 23 Q I'm sorry. I didn't hear the last -- 24 A I have to log in, into the phone</p>

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6 (Pages 18 to 21)

<p style="text-align: right;">Page 18</p> <p>1 system and the headset system.</p> <p>2 Q Let me take you back one step. What</p> <p>3 time do you normally work in the referral</p> <p>4 center?</p> <p>5 A 7:00 a.m. to 3:00 p.m.</p> <p>6 Q 7:00 a.m. to what time, ma'am?</p> <p>7 A 3:00 p.m.</p> <p>8 Q At what time in the morning do you</p> <p>9 log into the Cerner system?</p> <p>10 MS. McELROY: Objection to form. You</p> <p>11 can answer.</p> <p>12 BY THE WITNESS:</p> <p>13 A 7:00 a.m.</p> <p>14 BY MR. MORRISSEY:</p> <p>15 Q Do you follow the same pattern as far</p> <p>16 as your work performance each day in scheduling</p> <p>17 detainees at the Cook County Jail for oral</p> <p>18 surgery appointments?</p> <p>19 MS. McELROY: Objection to form. You</p> <p>20 can answer.</p> <p>21 BY THE WITNESS:</p> <p>22 A Yes, every day is the same.</p> <p>23 BY MR. MORRISSEY:</p> <p>24 Q So after you log into the system, the</p>	<p style="text-align: right;">Page 20</p> <p>1 from Dr. Caldwell?</p> <p>2 A No.</p> <p>3 Q Have you ever personally spoken to</p> <p>4 Dr. Alexander?</p> <p>5 A No.</p> <p>6 Q Have you ever personally spoken to</p> <p>7 Dr. Caldwell?</p> <p>8 A No.</p> <p>9 Q Have you ever personally spoken to</p> <p>10 Dr. Khan?</p> <p>11 A No.</p> <p>12 Q Have you ever personally spoken to</p> <p>13 any dentist at the Cook County Jail?</p> <p>14 A No.</p> <p>15 Q You said you had to log into your</p> <p>16 headset system. Why do you have to log into</p> <p>17 the headset system?</p> <p>18 A Because we don't have phones.</p> <p>19 Q The headsets are utilized by you to</p> <p>20 answer phone calls?</p> <p>21 A Yes.</p> <p>22 Q After you log into the phone system</p> <p>23 and the headset system on a daily basis, what</p> <p>24 is the next step that you take as a scheduler</p>
<p style="text-align: right;">Page 19</p> <p>1 Cerner system, you have to log into the phone</p> <p>2 system and the headset system, correct?</p> <p>3 A Yes.</p> <p>4 Q Why do you have to log into the phone</p> <p>5 system?</p> <p>6 A Because we have calls coming in to</p> <p>7 us.</p> <p>8 Q Are those calls from the general</p> <p>9 public?</p> <p>10 A General public, yes.</p> <p>11 Q Do you receive calls on the phone</p> <p>12 system from detainees at the Cook County Jail?</p> <p>13 A No.</p> <p>14 Q Do you ever receive phone calls on</p> <p>15 the phone system from dentists at the Cook</p> <p>16 County Jail?</p> <p>17 A No.</p> <p>18 Q Have you ever received a phone call</p> <p>19 specifically from Dr. Khan?</p> <p>20 A No.</p> <p>21 Q Have you ever received a phone call</p> <p>22 from Dr. Alexander?</p> <p>23 A No.</p> <p>24 Q Have you ever received a phone call</p>	<p style="text-align: right;">Page 21</p> <p>1 in the referral department?</p> <p>2 MS. McELROY: Objection to form. You</p> <p>3 can answer.</p> <p>4 BY THE WITNESS:</p> <p>5 A I might take 20 to 30 minutes for</p> <p>6 each clinic that I schedule for and work in</p> <p>7 between calls; and at the end of the day, I</p> <p>8 might go back to the same system.</p> <p>9 BY MR. MORRISSEY:</p> <p>10 Q On a daily basis, what other clinics</p> <p>11 other than oral surgery do you schedule for?</p> <p>12 A ENT, geriatrics, renal,</p> <p>13 musculoskeletal.</p> <p>14 Q Other than oral surgery, do you</p> <p>15 schedule detainees at the Cook County Jail for</p> <p>16 the other clinics?</p> <p>17 MS. McELROY: Objection to form and</p> <p>18 relevance. You can answer.</p> <p>19 BY THE WITNESS:</p> <p>20 A Yes.</p> <p>21 BY MR. MORRISSEY:</p> <p>22 Q Do you -- For instance, for ENT, how</p> <p>23 do you schedule detainees at the jail for the</p> <p>24 ENT clinic?</p>

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7 (Pages 22 to 25)

<p style="text-align: right;">Page 22</p> <p>1 MS. McELROY: Objection to form and</p> <p>2 relevance. You can answer.</p> <p>3 BY THE WITNESS:</p> <p>4 A On the order comments, the doctor is</p> <p>5 typing Cermak to let me know that that's a</p> <p>6 detainee. So they have their specific slots.</p> <p>7 BY MR. MORRISSEY:</p> <p>8 Q I didn't hear the last response. You</p> <p>9 tailed off.</p> <p>10 MR. MORRISSEY: Peggy, can you tell</p> <p>11 me what the...</p> <p>12 THE REPORTER: Sure.</p> <p>13 (WHEREUPON, the record was</p> <p>14 read as requested.)</p> <p>15 BY MR. MORRISSEY:</p> <p>16 Q For the ENT clinic at Stroger, are</p> <p>17 there specific slots for Cermak detainees to be</p> <p>18 seen?</p> <p>19 MS. McELROY: Objection, form and</p> <p>20 relevance. You can answer.</p> <p>21 BY THE WITNESS:</p> <p>22 A Yes.</p> <p>23 BY MR. MORRISSEY:</p> <p>24 Q How many slots a day in the ENT</p>	<p style="text-align: right;">Page 24</p> <p>1 BY MR. MORRISSEY:</p> <p>2 Q How do you know what day to schedule</p> <p>3 a detainee for the ENT clinic?</p> <p>4 MS. McELROY: Objection, form,</p> <p>5 relevance. You can answer.</p> <p>6 BY THE WITNESS:</p> <p>7 A Whatever the system gives me.</p> <p>8 BY MR. MORRISSEY:</p> <p>9 Q What do you mean by whatever the</p> <p>10 system gives you in regards to scheduling a</p> <p>11 detainee, for instance, for the ENT clinic?</p> <p>12 MS. McELROY: Objection, form,</p> <p>13 relevance. You can answer.</p> <p>14 BY THE WITNESS:</p> <p>15 A I go into suggest and the system</p> <p>16 gives me the next available appointment.</p> <p>17 MR. MORRISSEY: Peggy, can you read</p> <p>18 me back the response?</p> <p>19 (WHEREUPON, the record was</p> <p>20 read as requested.)</p> <p>21 BY MR. MORRISSEY:</p> <p>22 Q When you say "system," what are you</p> <p>23 referring to?</p> <p>24 A The Cerner system.</p>
<p style="text-align: right;">Page 23</p> <p>1 clinic are reserved for inmates at the jail?</p> <p>2 MS. McELROY: Objection to form and</p> <p>3 relevance. You can answer if you know.</p> <p>4 BY THE WITNESS:</p> <p>5 A I don't know.</p> <p>6 BY MR. MORRISSEY:</p> <p>7 Q If there was not a -- How do you</p> <p>8 schedule a detainee for the ENT clinic?</p> <p>9 MS. McELROY: Objection, form, asked</p> <p>10 and answered. You can answer.</p> <p>11 BY THE WITNESS:</p> <p>12 A It has a different -- On the</p> <p>13 template, it's a different color and it says</p> <p>14 Cermak.</p> <p>15 BY MR. MORRISSEY:</p> <p>16 Q Is there -- What is the template?</p> <p>17 A The schedule in Cerner.</p> <p>18 Q Is there a template for each day that</p> <p>19 the ENT clinic is open?</p> <p>20 MS. McELROY: Objection, form,</p> <p>21 relevance. You can answer if you know.</p> <p>22 BY THE WITNESS:</p> <p>23 A Yes.</p> <p>24</p>	<p style="text-align: right;">Page 25</p> <p>1 Q Is that the Cerner system for</p> <p>2 scheduling?</p> <p>3 A Yes.</p> <p>4 Q And is there a tab that says suggest?</p> <p>5 A Yes.</p> <p>6 Q And how do you -- If there is a --</p> <p>7 Referring to the ENT clinic, is there a queue</p> <p>8 for you to schedule patients for the ENT</p> <p>9 clinic?</p> <p>10 MS. McELROY: I'm going to object to</p> <p>11 form and relevance. This case has nothing</p> <p>12 to do with the ENT clinic. I think it's</p> <p>13 pretty improper that you're asking about a</p> <p>14 completely different clinic. That case has</p> <p>15 nothing to do with the ENT clinic. It's</p> <p>16 all about --</p> <p>17 MR. MORRISSEY: Ms. McElroy, you can</p> <p>18 make an objection, form. But you can't</p> <p>19 make a speaking objection.</p> <p>20 MS. McELROY: I just did and I can.</p> <p>21 MR. MORRISSEY: Well, you can't.</p> <p>22 BY MR. MORRISSEY:</p> <p>23 Q Ms. Macias, is there a queue --</p> <p>24 MS. McELROY: It's Macias. Please</p>

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8 (Pages 26 to 29)

<p style="text-align: right;">Page 26</p> <p>1 refer to her by her real name, which is</p> <p>2 Macias, not Macias [pronunciation].</p> <p>3 BY MR. MORRISSEY:</p> <p>4 Q Ms. Macias, is there a --</p> <p>5 MS. McELROY: Macias. Please use her</p> <p>6 real name, Macias, not Macias.</p> <p>7 MR. MORRISSEY: Macias.</p> <p>8 BY MR. MORRISSEY:</p> <p>9 Q Is there a queue for you to schedule</p> <p>10 individuals for the ENT clinic?</p> <p>11 MS. McELROY: Objection to form and</p> <p>12 relevance. You can answer.</p> <p>13 BY THE WITNESS:</p> <p>14 A Yes.</p> <p>15 BY MR. MORRISSEY:</p> <p>16 Q And that's a specific queue for the</p> <p>17 ENT clinic?</p> <p>18 MS. McELROY: Objection to form and</p> <p>19 relevance. You can answer.</p> <p>20 BY THE WITNESS:</p> <p>21 A Yes.</p> <p>22 BY MR. MORRISSEY:</p> <p>23 Q And is that a -- As a -- When you</p> <p>24 come in each day, is there a new queue each day</p>	<p style="text-align: right;">Page 28</p> <p>1 MS. McELROY: Objection to form and</p> <p>2 relevance. You can answer.</p> <p>3 BY THE WITNESS:</p> <p>4 A They get the next available date.</p> <p>5 BY MR. MORRISSEY:</p> <p>6 Q My question is: Does each clinic</p> <p>7 have a separate queue?</p> <p>8 A Yes.</p> <p>9 Q How do you access the queue for each</p> <p>10 clinic in Cerner?</p> <p>11 MS. McELROY: Objection, form. You</p> <p>12 can answer.</p> <p>13 BY THE WITNESS:</p> <p>14 A I go into power orders and I chose</p> <p>15 the clinics that I schedule for. And on the</p> <p>16 top, it should be the first patient on the</p> <p>17 list, meaning that it was the first patient</p> <p>18 that was requested. They're done in the order</p> <p>19 that we receive them.</p> <p>20 BY MR. MORRISSEY:</p> <p>21 Q After you schedule a person for an</p> <p>22 ENT appointment, does the name come off the</p> <p>23 queue?</p> <p>24 A Yes, it does.</p>
<p style="text-align: right;">Page 27</p> <p>1 for the ENT clinic that you schedule patients</p> <p>2 off of?</p> <p>3 MS. McELROY: Objection to form and</p> <p>4 relevance. You can answer.</p> <p>5 BY THE WITNESS:</p> <p>6 A Can you rephrase that?</p> <p>7 BY MR. MORRISSEY:</p> <p>8 Q Sure. You mentioned that you</p> <p>9 schedule patients off a queue for the ENT</p> <p>10 clinic?</p> <p>11 A Yes.</p> <p>12 Q Is that queue -- Does it identify the</p> <p>13 date for the queue?</p> <p>14 MS. McELROY: Objection to form. You</p> <p>15 can answer.</p> <p>16 BY THE WITNESS:</p> <p>17 A The date that it was submitted? Yes.</p> <p>18 BY MR. MORRISSEY:</p> <p>19 Q And after a name for a referral is</p> <p>20 placed on the ENT queue, as a scheduler, are</p> <p>21 you required to schedule, for instance, a</p> <p>22 patient in the ENT in a certain number of days</p> <p>23 after it appears on the queue in the ENT</p> <p>24 clinic?</p>	<p style="text-align: right;">Page 29</p> <p>1 Q Do you have to do anything to take</p> <p>2 the name off the queue?</p> <p>3 A No.</p> <p>4 Q If there is a referral from Cermak</p> <p>5 for a detainee on the ENT queue, how do you</p> <p>6 schedule that person in the ENT clinic? Walk</p> <p>7 me through the steps.</p> <p>8 MS. McELROY: Objection to form,</p> <p>9 relevance. You've already asked and she's</p> <p>10 already answered this question. You can</p> <p>11 answer it again.</p> <p>12 BY THE WITNESS:</p> <p>13 A Okay. I take my patient. I go in</p> <p>14 the process request. The system gives me the</p> <p>15 next available appointment. I chose the date,</p> <p>16 confirm and okay and it's done.</p> <p>17 BY MR. MORRISSEY:</p> <p>18 Q You previously said that the system,</p> <p>19 when you schedule a person, for instance, for</p> <p>20 the ENT clinic, you hit a tab suggestion,</p> <p>21 suggest?</p> <p>22 A Yes. Suggest gives me the first</p> <p>23 date, and after that, whatever follows.</p> <p>24 Q After you hit the suggest tab, what</p>

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9 (Pages 30 to 33)

<p style="text-align: right;">Page 30</p> <p>1 follows as far as scheduling a person for the</p> <p>2 ENT clinic?</p> <p>3 MS. McELROY: Objection to form. You</p> <p>4 can answer.</p> <p>5 BY THE WITNESS:</p> <p>6 A The next date after that.</p> <p>7 BY MR. MORRISSEY:</p> <p>8 Q What do you do when the date appears</p> <p>9 on your screen?</p> <p>10 A I'm sorry.</p> <p>11 Q You mentioned that in scheduling an</p> <p>12 inmate for the ENT clinic, you take the person</p> <p>13 off the queue and then you hit the suggest tab</p> <p>14 and that gives you the next available date for</p> <p>15 an inmate at the jail, correct?</p> <p>16 A Yes.</p> <p>17 Q Once you -- Does that appear on the</p> <p>18 screen, the next date for the inmate to be</p> <p>19 scheduled for the ENT clinic?</p> <p>20 A All the dates that are available</p> <p>21 appears on the screen, but I choose the first</p> <p>22 date available.</p> <p>23 Q How do you choose the first date</p> <p>24 available?</p>	<p style="text-align: right;">Page 32</p> <p>1 MS. McELROY: Objection, form. You</p> <p>2 can answer.</p> <p>3 BY THE WITNESS:</p> <p>4 A I click on the date. I hit okay,</p> <p>5 confirm and it's done.</p> <p>6 BY MR. MORRISSEY:</p> <p>7 Q Do you have any other tasks that you</p> <p>8 do in scheduling a detainee for an ENT</p> <p>9 appointment other than what you previously</p> <p>10 testified to?</p> <p>11 A That's it.</p> <p>12 Q If I asked you in regards to the</p> <p>13 other clinics, renal and I think you said</p> <p>14 geriatrics --</p> <p>15 A Yes.</p> <p>16 Q -- would the same be true in regards</p> <p>17 to scheduling an inmate for the jail for those</p> <p>18 other clinics?</p> <p>19 MS. McELROY: Objection to form and</p> <p>20 relevance. You can answer.</p> <p>21 BY THE WITNESS:</p> <p>22 A For all other clinics, I have no way</p> <p>23 of knowing if they're inmates.</p> <p>24</p>
<p style="text-align: right;">Page 31</p> <p>1 MS. McELROY: Objection to form. You</p> <p>2 can answer.</p> <p>3 BY THE WITNESS:</p> <p>4 A That's what I'm supposed to do.</p> <p>5 BY MR. MORRISSEY:</p> <p>6 Q I understand. But tell me -- You</p> <p>7 mentioned that you hit the suggest date in</p> <p>8 Cerner and it lists all the available dates for</p> <p>9 the inmate to be seen, correct?</p> <p>10 A Yes.</p> <p>11 Q Does that list all the available</p> <p>12 dates going forward for how long?</p> <p>13 MS. McELROY: Objection to form.</p> <p>14 Answer, if you know.</p> <p>15 BY THE WITNESS:</p> <p>16 A I don't know. I don't know how many</p> <p>17 slots. It will pop up. I don't know.</p> <p>18 BY MR. MORRISSEY:</p> <p>19 Q But there are numerous dates that</p> <p>20 will pop up on the screen?</p> <p>21 A Yes.</p> <p>22 Q What do you do to select the first</p> <p>23 date? How do you go about that? Walk me</p> <p>24 through it.</p>	<p style="text-align: right;">Page 33</p> <p>1 BY MR. MORRISSEY:</p> <p>2 Q So the only -- Other than oral</p> <p>3 surgery, the ENT clinic is the only other</p> <p>4 clinic that you schedule for where you're aware</p> <p>5 that the person is a detainee at the jail?</p> <p>6 A Correct.</p> <p>7 Q Assuming that a -- Have you ever</p> <p>8 scheduled an inmate for the renal clinic?</p> <p>9 A If I did, I did not know it was an</p> <p>10 inmate.</p> <p>11 Q Can you tell me how you would</p> <p>12 schedule a Cermak patient for an oral surgery</p> <p>13 appointment? Walk me through step by step as a</p> <p>14 scheduler how you would schedule a Cermak</p> <p>15 patient for an oral surgery appointment, and</p> <p>16 pretend that I don't know anything about it and</p> <p>17 you're training me as a future scheduler in the</p> <p>18 referral center.</p> <p>19 MS. McELROY: Objection to form. You</p> <p>20 can answer if you can comprehend his</p> <p>21 question.</p> <p>22 BY THE WITNESS:</p> <p>23 A I go to my first patient because I</p> <p>24 saw in the order comments that it's a Cermak</p>

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10 (Pages 34 to 37)

<p style="text-align: right;">Page 34</p> <p>1 patient. So I do a complete request.</p> <p>2 BY MR. MORRISSEY:</p> <p>3 Q I'm sorry. Can we go back one step,</p> <p>4 ma'am? Can we take it from -- What time of the</p> <p>5 day do you schedule patients for the oral</p> <p>6 surgery clinic?</p> <p>7 MS. McELROY: Objection to form. You</p> <p>8 can answer.</p> <p>9 BY THE WITNESS:</p> <p>10 A I try to do it between 7:00 a.m. and</p> <p>11 8:00 o'clock a.m.</p> <p>12 BY MR. MORRISSEY:</p> <p>13 Q Okay. And that would be the time</p> <p>14 slot that you -- It's your practice to schedule</p> <p>15 oral surgery appointments on a daily basis?</p> <p>16 MS. McELROY: Objection to form. You</p> <p>17 can answer.</p> <p>18 BY THE WITNESS:</p> <p>19 A Yes.</p> <p>20 BY MR. MORRISSEY:</p> <p>21 Q Walk me through the steps from the</p> <p>22 point you access the queue in the Cerner system</p> <p>23 for scheduling a detainee for an oral surgery</p> <p>24 appointment.</p>	<p style="text-align: right;">Page 36</p> <p>1 surgery appointments?</p> <p>2 A Yes. It's in the same queue.</p> <p>3 Q And it also -- That same queue has</p> <p>4 patients from Cermak?</p> <p>5 A Yes.</p> <p>6 Q The first patient on the queue would</p> <p>7 be a Cermak patient or it could be a person</p> <p>8 from the general public; is that true?</p> <p>9 A Yes.</p> <p>10 Q Assuming that the first patient on</p> <p>11 the queue is a person from the general public,</p> <p>12 tell me how you would schedule that person off</p> <p>13 the queue --</p> <p>14 MS. McELROY: Objection to form.</p> <p>15 BY MR. MORRISSEY:</p> <p>16 Q -- for oral surgery.</p> <p>17 MS. McELROY: Objection to form. You</p> <p>18 can answer.</p> <p>19 BY THE WITNESS:</p> <p>20 A I go to my first patient, do the</p> <p>21 complete request, click on suggest.</p> <p>22 BY MR. MORRISSEY:</p> <p>23 Q I didn't hear the --</p> <p>24 MR. MORRISSEY: Peggy, can you read</p>
<p style="text-align: right;">Page 35</p> <p>1 MS. McELROY: Objection to form,</p> <p>2 asked and answered. You can answer.</p> <p>3 BY THE WITNESS:</p> <p>4 A I go to my first patient.</p> <p>5 BY MR. MORRISSEY:</p> <p>6 Q Can I ask you how you would determine</p> <p>7 who your first patient would be?</p> <p>8 A It would be on the top of the list.</p> <p>9 Q The top of the queue?</p> <p>10 A Yes.</p> <p>11 Q And the queue is in the Cerner</p> <p>12 system, correct?</p> <p>13 A Correct.</p> <p>14 Q On an average, how many individuals</p> <p>15 are on the daily queue to be scheduled for oral</p> <p>16 surgery appointments?</p> <p>17 MS. McELROY: Objection to form,</p> <p>18 foundation. You can answer.</p> <p>19 BY THE WITNESS:</p> <p>20 A I don't -- I can't keep a record of</p> <p>21 how many. I don't remember.</p> <p>22 BY MR. MORRISSEY:</p> <p>23 Q Does the queue contain people from</p> <p>24 the general public to be scheduled for oral</p>	<p style="text-align: right;">Page 37</p> <p>1 back that?</p> <p>2 (WHEREUPON, the record was</p> <p>3 read as requested.)</p> <p>4 BY THE WITNESS:</p> <p>5 A The system gives the next date.</p> <p>6 MS. McELROY: There's not a question</p> <p>7 pending. Don't answer. Wait for his</p> <p>8 question.</p> <p>9 THE WITNESS: Okay.</p> <p>10 BY MR. MORRISSEY:</p> <p>11 Q What information is on the complete</p> <p>12 request?</p> <p>13 MS. McELROY: Objection to form. You</p> <p>14 can answer.</p> <p>15 BY THE WITNESS:</p> <p>16 A The patient's name.</p> <p>17 BY MR. MORRISSEY:</p> <p>18 Q Any other information that's on the</p> <p>19 complete request?</p> <p>20 A Well, on the order, the date that it</p> <p>21 was submitted, the doctor's name that requested</p> <p>22 that order, the diagnosis and any other</p> <p>23 comments regarding the order.</p> <p>24 Q On the queue -- Let's go back one</p>

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11 (Pages 38 to 41)

<p style="text-align: right;">Page 38</p> <p>1 step.</p> <p>2 On the queue, does it have the</p> <p>3 doctor's name who made the referral?</p> <p>4 MS. McELROY: Objection. She's</p> <p>5 already said yes.</p> <p>6 BY THE WITNESS:</p> <p>7 A It's on the order.</p> <p>8 BY MR. MORRISSEY:</p> <p>9 Q My question was: On the queue --</p> <p>10 Does the queue just have a list of names --</p> <p>11 A Yes.</p> <p>12 Q -- of people wanting to be referred?</p> <p>13 A Yes.</p> <p>14 Q Does it have the -- Does the queue</p> <p>15 itself have this information you just talked</p> <p>16 about, the doctor's name, the diagnosis and the</p> <p>17 comments and the order?</p> <p>18 A Yes.</p> <p>19 Q That's all contained on the queue?</p> <p>20 A Yes.</p> <p>21 Q And then after you take the first</p> <p>22 name off the queue, you hit a tab called</p> <p>23 complete request; is that true?</p> <p>24 A Yes.</p>	<p style="text-align: right;">Page 40</p> <p>1 A Correct.</p> <p>2 Q And then from there, there is another</p> <p>3 tab you have to hit which is suggest?</p> <p>4 A Yes.</p> <p>5 Q And that automatically, for the</p> <p>6 general public, gives the next appointment</p> <p>7 date?</p> <p>8 A Yes.</p> <p>9 Q And what do you then do after the</p> <p>10 next appointment date for the general public as</p> <p>11 the scheduler?</p> <p>12 MS. McELROY: Objection to form. You</p> <p>13 can answer if you understand the question.</p> <p>14 BY THE WITNESS:</p> <p>15 A After I confirm that patient, I go to</p> <p>16 my next patient.</p> <p>17 BY MR. MORRISSEY:</p> <p>18 Q So in regards to the general public</p> <p>19 in scheduling a person for an appointment, do</p> <p>20 you have any discretion in regards to when to</p> <p>21 schedule the patient if you're scheduling them</p> <p>22 off the queue?</p> <p>23 MS. McELROY: Objection to form. You</p> <p>24 can answer.</p>
<p style="text-align: right;">Page 39</p> <p>1 Q When you hit complete request, what</p> <p>2 appears on your screen or your monitor?</p> <p>3 MS. McELROY: Objection to form.</p> <p>4 BY THE WITNESS:</p> <p>5 A I chose the suggest.</p> <p>6 BY MR. MORRISSEY:</p> <p>7 Q My question is --</p> <p>8 A I chose suggest.</p> <p>9 Q Ma'am, can we go back a step? You</p> <p>10 said that in order to schedule, you have to hit</p> <p>11 a tab, complete request; is that correct?</p> <p>12 A Yes.</p> <p>13 Q Why do you have to hit complete</p> <p>14 request after selecting a name to schedule?</p> <p>15 A That's the process. It takes me to</p> <p>16 scheduling.</p> <p>17 Q So unless you hit complete request,</p> <p>18 you don't go into the program that allows you</p> <p>19 to schedule?</p> <p>20 A It automatically takes me to that</p> <p>21 clinic so I can schedule.</p> <p>22 Q So by hitting the complete request,</p> <p>23 it puts you into the oral surgery clinic's</p> <p>24 template; is that correct?</p>	<p style="text-align: right;">Page 41</p> <p>1 BY THE WITNESS:</p> <p>2 A I am only reading the tab that says</p> <p>3 request comments. That's done by Dr. Qaisi in</p> <p>4 oral surgery, and it's been reviewed by</p> <p>5 Dr. Qaisi. So he types: Schedule next</p> <p>6 available appointment.</p> <p>7 BY MR. MORRISSEY:</p> <p>8 Q That's for people in the general</p> <p>9 public?</p> <p>10 A That's for both, general public and</p> <p>11 detainees.</p> <p>12 Q How do you know that Dr. Qaisi, when</p> <p>13 you click complete request, has made a comment:</p> <p>14 Next available appointment?</p> <p>15 MS. McELROY: Objection to form and</p> <p>16 foundation. You can answer.</p> <p>17 BY THE WITNESS:</p> <p>18 A Yes.</p> <p>19 BY MR. MORRISSEY:</p> <p>20 Q No. My question is: How do you know</p> <p>21 as a scheduler that Dr. Qaisi has looked at the</p> <p>22 queue?</p> <p>23 MS. McELROY: Objection to form,</p> <p>24 foundation. You can answer.</p>

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12 (Pages 42 to 45)

<p style="text-align: right;">Page 42</p> <p>1 BY THE WITNESS:</p> <p>2 A Because that tab is supposed to be</p> <p>3 reviewed by Dr. Qaisi. So if I --</p> <p>4 BY MR. MORRISSEY:</p> <p>5 Q My question is: Have you ever talked</p> <p>6 to Dr. Qaisi in regards to scheduling oral</p> <p>7 surgery appointments?</p> <p>8 A Probably once.</p> <p>9 Q When did you speak with Dr. Qaisi?</p> <p>10 A It was months ago. He had a patient</p> <p>11 that he was going to transfer to us.</p> <p>12 Q Do you recall the name of the</p> <p>13 patient?</p> <p>14 A No.</p> <p>15 Q Did he call you specifically?</p> <p>16 A Not me specifically, but I'm the one</p> <p>17 who got the call on the 1800 number.</p> <p>18 Q What is the 1800 number?</p> <p>19 A It's the referral center, our number.</p> <p>20 Q And did you receive a call from the</p> <p>21 patient themselves?</p> <p>22 A He transferred the call to us.</p> <p>23 Q And the call was from a member of the</p> <p>24 general public?</p>	<p style="text-align: right;">Page 44</p> <p>1 conversations with Dr. Qaisi?</p> <p>2 A No.</p> <p>3 Q Has Dr. Qaisi written to you or given</p> <p>4 you any written instructions in regards to</p> <p>5 scheduling oral surgery appointments?</p> <p>6 A No.</p> <p>7 Q Has your supervisor given you any</p> <p>8 written directions in the last three years in</p> <p>9 regards to scheduling oral surgery</p> <p>10 appointments?</p> <p>11 MS. McELROY: Objection to form. You</p> <p>12 can answer if you know.</p> <p>13 BY THE WITNESS:</p> <p>14 A Yes.</p> <p>15 BY MR. MORRISSEY:</p> <p>16 Q Okay. What written instructions has</p> <p>17 your supervisor given you in regards to oral</p> <p>18 surgery appointments?</p> <p>19 A Not written, no. Verbal.</p> <p>20 Q Okay. When did your supervisor --</p> <p>21 And her name is again -- The supervisor's name</p> <p>22 is?</p> <p>23 A Shivon.</p> <p>24 Q Shivon?</p>
<p style="text-align: right;">Page 43</p> <p>1 A Yes.</p> <p>2 Q And did you talk to Dr. Qaisi during</p> <p>3 that call?</p> <p>4 A I talked to him when he was letting</p> <p>5 me know that he was going to transfer the</p> <p>6 patient to me.</p> <p>7 Q What did Dr. Qaisi say to you?</p> <p>8 MS. McELROY: Objection to form and</p> <p>9 relevance. You can answer if you know.</p> <p>10 BY THE WITNESS:</p> <p>11 A That he was going to transfer a</p> <p>12 patient to us, and he gave me the name of the</p> <p>13 patient.</p> <p>14 BY MR. MORRISSEY:</p> <p>15 Q And that was last year?</p> <p>16 A A couple of months ago. I cannot</p> <p>17 remember what date it was.</p> <p>18 Q Other than that call where Dr. Qaisi</p> <p>19 transferred a patient to you, in the last three</p> <p>20 years, have you had any other phone call with</p> <p>21 Dr. Qaisi?</p> <p>22 A No.</p> <p>23 Q In the last -- Since 2017 to the</p> <p>24 present, have you had any contact, direct</p>	<p style="text-align: right;">Page 45</p> <p>1 A Yes.</p> <p>2 Q When did Shivon give you oral</p> <p>3 instructions in regards to scheduling oral</p> <p>4 surgery appointments?</p> <p>5 A A couple of weeks ago.</p> <p>6 Q Prior to that time, since 2017 to the</p> <p>7 present, did your supervisor give you any oral</p> <p>8 instructions in regards to scheduling oral</p> <p>9 surgery appointments?</p> <p>10 MS. McELROY: Objection to form. You</p> <p>11 can answer.</p> <p>12 BY THE WITNESS:</p> <p>13 A Yes.</p> <p>14 BY MR. MORRISSEY:</p> <p>15 Q Prior to a couple of weeks ago, when</p> <p>16 was the last time she gave you instructions in</p> <p>17 regards to scheduling oral surgery</p> <p>18 appointments?</p> <p>19 A Besides three to four weeks ago, I</p> <p>20 don't remember.</p> <p>21 Q What did your supervisor, Shivon,</p> <p>22 tell you three or four weeks ago in regards to</p> <p>23 scheduling oral surgery appointments?</p> <p>24 MS. McELROY: Objection to form. You</p>

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13 (Pages 46 to 49)

<p style="text-align: right;">Page 46</p> <p>1 can answer.</p> <p>2 BY THE WITNESS:</p> <p>3 A The clinic had slots and she told me</p> <p>4 to use them.</p> <p>5 BY MR. MORRISSEY:</p> <p>6 Q I'm sorry. Can you --</p> <p>7 MR. MORRISSEY: Peggy, can you read</p> <p>8 back the last statement?</p> <p>9 (WHEREUPON, the record was</p> <p>10 read as requested.)</p> <p>11 BY MR. MORRISSEY:</p> <p>12 Q What did you understand her to mean</p> <p>13 when she said the clinic had spots and you were</p> <p>14 to use them?</p> <p>15 MS. McELROY: Objection to form. You</p> <p>16 can answer.</p> <p>17 BY THE WITNESS:</p> <p>18 A They are -- They were telehealth</p> <p>19 slots, meaning phone visits. So she told me to</p> <p>20 use the slots. I normally don't do that.</p> <p>21 That's why she informed me that I should use</p> <p>22 them.</p> <p>23 BY MR. MORRISSEY:</p> <p>24 Q There are slots on the template for</p>	<p style="text-align: right;">Page 48</p> <p>1 appointments. What is your understanding of</p> <p>2 those appointments?</p> <p>3 A It's a phone visit. The doctor or</p> <p>4 nurse calls the patient.</p> <p>5 Q And this came about because of the</p> <p>6 epidemic?</p> <p>7 A Yes.</p> <p>8 Q So that allows somebody -- a provider</p> <p>9 in the oral surgery department to call the</p> <p>10 patient?</p> <p>11 A Yes.</p> <p>12 Q Do you know if those slots are used</p> <p>13 for inmates at the Cook County Jail?</p> <p>14 MS. McELROY: Objection to form.</p> <p>15 Answer, if you know.</p> <p>16 BY THE WITNESS:</p> <p>17 A No. I don't know.</p> <p>18 BY MR. MORRISSEY:</p> <p>19 Q Did Shivon tell you to use those</p> <p>20 telehealth appointments for inmates at the Cook</p> <p>21 County Jail?</p> <p>22 A No. She did not.</p> <p>23 Q Other than three or four weeks ago,</p> <p>24 did you have any other conversation with Shivon</p>
<p style="text-align: right;">Page 47</p> <p>1 telephone calls?</p> <p>2 A Yes.</p> <p>3 Q And prior to three or four weeks ago,</p> <p>4 you didn't use those slots other than for --</p> <p>5 other than for people from the general public</p> <p>6 that call in; is that fair to say?</p> <p>7 MS. McELROY: Objection to form. You</p> <p>8 can answer.</p> <p>9 BY THE WITNESS:</p> <p>10 A Can you rephrase that?</p> <p>11 BY MR. MORRISSEY:</p> <p>12 Q Sure. As a scheduler, prior to three</p> <p>13 weeks ago, what would you use the telephone</p> <p>14 slots for as far as scheduling oral surgery</p> <p>15 appointments?</p> <p>16 MS. McELROY: Objection to form. You</p> <p>17 can answer.</p> <p>18 BY THE WITNESS:</p> <p>19 A This is the first time that we have</p> <p>20 telehealth appointments since we still have the</p> <p>21 world pandemic. So it's something new, and I</p> <p>22 was just told to use the slots.</p> <p>23 BY MR. MORRISSEY:</p> <p>24 Q Tell me about the telehealth</p>	<p style="text-align: right;">Page 49</p> <p>1 or any other supervisor in the referral center</p> <p>2 in regards to scheduling appointments in the</p> <p>3 oral surgery department in the last three</p> <p>4 years?</p> <p>5 A No.</p> <p>6 Q So no, you mean in the last three</p> <p>7 years other than that one conversation you had</p> <p>8 with Shivon about telehealth appointments, you</p> <p>9 don't recall any other conversation with your</p> <p>10 supervisors about scheduling oral surgery</p> <p>11 appointments?</p> <p>12 A Prior to that, I don't remember.</p> <p>13 Q Now, in regards to the other clinics</p> <p>14 that you schedule, for instance, the ENT</p> <p>15 clinic, do you know whether or not the doctors</p> <p>16 within those clinics communicate to you as far</p> <p>17 as when to schedule appointments for inmates?</p> <p>18 MS. McELROY: Objection, form and</p> <p>19 relevance. You can answer.</p> <p>20 BY THE WITNESS:</p> <p>21 A Only in power orders. If the doctor</p> <p>22 made the request comment, that's when I</p> <p>23 schedule the patient for the next available</p> <p>24 appointment.</p>

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14 (Pages 50 to 53)

<p style="text-align: right;">Page 50</p> <p>1 BY MR. MORRISSEY:</p> <p>2 Q Now, going back to the queue for oral</p> <p>3 surgery, is there anything in the queue itself</p> <p>4 that Dr. Qaisi's name appears on the queue?</p> <p>5 A I don't even see that in the dental</p> <p>6 extraction because that's the clinic that I do.</p> <p>7 Any other clinics, I would not know.</p> <p>8 Q Okay. My question is: When you look</p> <p>9 at the daily queue for oral surgery --</p> <p>10 A Okay.</p> <p>11 Q -- next to each patient's name, is</p> <p>12 there an entry or a comment made by Dr. Qaisi</p> <p>13 on a daily basis?</p> <p>14 MS. McELROY: Objection, form. You</p> <p>15 can answer if you know.</p> <p>16 BY THE WITNESS:</p> <p>17 A Yes.</p> <p>18 BY MR. MORRISSEY:</p> <p>19 Q Is that because Dr. Qaisi is the</p> <p>20 acting director of oral surgery?</p> <p>21 MS. McELROY: Objection to form and</p> <p>22 foundation. You can answer if you know.</p> <p>23 BY THE WITNESS:</p> <p>24 A I think he is.</p>	<p style="text-align: right;">Page 52</p> <p>1 BY MR. MORRISSEY:</p> <p>2 Q Who told you that?</p> <p>3 A My supervisor.</p> <p>4 Q So on the queue for each patient that</p> <p>5 appears in the oral surgery department, is</p> <p>6 there a comment by Dr. Qaisi?</p> <p>7 MS. McELROY: Objection to form. You</p> <p>8 can answer.</p> <p>9 BY THE WITNESS:</p> <p>10 A He reviews all patients.</p> <p>11 BY MR. MORRISSEY:</p> <p>12 Q That's not my question, ma'am. When</p> <p>13 you look at the queue, what information is in</p> <p>14 the queue on a daily basis?</p> <p>15 MS. McELROY: Objection to form. You</p> <p>16 can answer if you know.</p> <p>17 BY THE WITNESS:</p> <p>18 A I see the patient's name, the date</p> <p>19 that it was submitted, the doctor that is</p> <p>20 requesting the referral, diagnosis. That's all</p> <p>21 I can think of.</p> <p>22 BY MR. MORRISSEY:</p> <p>23 Q Is there anything else?</p> <p>24 A That's all I can think of. I'm not</p>
<p style="text-align: right;">Page 51</p> <p>1 BY MR. MORRISSEY:</p> <p>2 Q Do you have any personal knowledge</p> <p>3 whether or not Dr. Qaisi reviews the queue in</p> <p>4 Cerner on a daily basis?</p> <p>5 MS. McELROY: Objection to form and</p> <p>6 foundation. You can answer if you know.</p> <p>7 BY THE WITNESS:</p> <p>8 A I was told he does by my supervisor.</p> <p>9 BY MR. MORRISSEY:</p> <p>10 Q My question is: Do you have any</p> <p>11 personal knowledge that Dr. Qaisi reviews the</p> <p>12 queue?</p> <p>13 A He writes comments for me to know</p> <p>14 next available extraction appointment.</p> <p>15 Q Let me ask you. Do you have any</p> <p>16 personal knowledge whether or not Dr. Qaisi</p> <p>17 reviews the queue prior to your scheduling?</p> <p>18 MS. McELROY: Objection, asked and</p> <p>19 answered. You can answer again.</p> <p>20 BY THE WITNESS:</p> <p>21 A If I see something on request</p> <p>22 comments saying next available appointment, it</p> <p>23 means that it was reviewed by Dr. Qaisi.</p> <p>24</p>	<p style="text-align: right;">Page 53</p> <p>1 looking at it, so.</p> <p>2 Q I'm going to have you turn to an</p> <p>3 exhibit.</p> <p>4 MS. McELROY: Mr. Morrissey, before</p> <p>5 we get started, can I run to the ladies'</p> <p>6 room? I think I had way too much water.</p> <p>7 Two minutes, please.</p> <p>8 (WHEREUPON, a short break</p> <p>9 was had.)</p> <p>10 BY MR. MORRISSEY:</p> <p>11 Q Ma'am, you realize you're still under</p> <p>12 oath?</p> <p>13 A Yes.</p> <p>14 Q During the break, did you have an</p> <p>15 opportunity to talk to your attorneys?</p> <p>16 MS. McELROY: Objection to form</p> <p>17 but --</p> <p>18 BY THE WITNESS:</p> <p>19 A No.</p> <p>20 BY MR. MORRISSEY:</p> <p>21 Q Have you ever spoken -- Do you know</p> <p>22 the other doctors that work in the oral surgery</p> <p>23 clinic at Stroger?</p> <p>24 A Can you rephrase it?</p>

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15 (Pages 54 to 57)

<p style="text-align: right;">Page 54</p> <p>1 Q Sure. Do you know the names of any</p> <p>2 of the doctors that work in the oral surgery</p> <p>3 department?</p> <p>4 A I have seen their names on the</p> <p>5 schedule.</p> <p>6 Q And what names have you seen on the</p> <p>7 schedule?</p> <p>8 A Dr. Murphy, Dr. Shah.</p> <p>9 Q Have you ever spoken to Dr. Murphy?</p> <p>10 A No.</p> <p>11 Q Have you ever met Dr. Murphy?</p> <p>12 A No.</p> <p>13 Q Have you ever met Dr. Qaisi?</p> <p>14 A Once.</p> <p>15 Q When did you meet Dr. Qaisi?</p> <p>16 A I didn't really meet him. I just saw</p> <p>17 him in my area walking in. I don't know what</p> <p>18 he was doing.</p> <p>19 Q You didn't talk to him at that time?</p> <p>20 A I said hi.</p> <p>21 Q Was that the extent of your</p> <p>22 conversation with Dr. Qaisi?</p> <p>23 A That was it.</p> <p>24 Q Have you ever spoken to Dr. Shah?</p>	<p style="text-align: right;">Page 56</p> <p>1 mischaracterizes previous testimony. You</p> <p>2 can answer.</p> <p>3 BY THE WITNESS:</p> <p>4 A Yes.</p> <p>5 BY MR. MORRISSEY:</p> <p>6 Q You also mentioned that at some point</p> <p>7 in time Shivon Bowers told you that Dr. Qaisi</p> <p>8 reviews the queue?</p> <p>9 MS. McELROY: Objection to form,</p> <p>10 foundation. You can answer.</p> <p>11 BY THE WITNESS:</p> <p>12 A Yes.</p> <p>13 BY MR. MORRISSEY:</p> <p>14 Q When did you have this conversation</p> <p>15 with Shivon Bowers in regards to her belief</p> <p>16 that Dr. Qaisi reviews the queue?</p> <p>17 MS. McELROY: Objection to form,</p> <p>18 foundation.</p> <p>19 BY THE WITNESS:</p> <p>20 A It was probably two, three weeks ago.</p> <p>21 BY MR. MORRISSEY:</p> <p>22 Q Was that during the same conversation</p> <p>23 when she told you about this telephone clinic?</p> <p>24 MS. McELROY: Objection to form. You</p>
<p style="text-align: right;">Page 55</p> <p>1 A No.</p> <p>2 Q Has Dr. Shah ever called you to make</p> <p>3 an appointment?</p> <p>4 A No.</p> <p>5 Q Has Dr. Murphy ever called you to</p> <p>6 make an appointment?</p> <p>7 A No.</p> <p>8 Q Has either Dr. Murphy or Dr. Shah</p> <p>9 ever sent you anything in writing to schedule</p> <p>10 an appointment?</p> <p>11 A No.</p> <p>12 Q Has Dr. Qaisi ever sent you anything</p> <p>13 in writing to set up an appointment?</p> <p>14 A No.</p> <p>15 Q Do you know any of the residents that</p> <p>16 work in the oral surgery clinic?</p> <p>17 A No, I don't.</p> <p>18 Q Do you know how long Dr. Qaisi has</p> <p>19 been the acting head of oral surgery?</p> <p>20 A I don't.</p> <p>21 Q You mentioned that you had a</p> <p>22 conversation with Shivon Bowers about oral</p> <p>23 surgery three or four weeks ago, correct?</p> <p>24 MS. McELROY: Objection, form,</p>	<p style="text-align: right;">Page 57</p> <p>1 can answer.</p> <p>2 BY THE WITNESS:</p> <p>3 A I don't remember if it was the same</p> <p>4 conversation.</p> <p>5 BY MR. MORRISSEY:</p> <p>6 Q And what did Shivon Bowers tell you</p> <p>7 in regards to Dr. Qaisi and the queue two or</p> <p>8 three weeks ago?</p> <p>9 A Can you rephrase it?</p> <p>10 Q Yeah. You said that you heard -- you</p> <p>11 learned that for the first time from a</p> <p>12 conversation with Shivon Bowers two or three</p> <p>13 weeks ago that Dr. Qaisi at some point had</p> <p>14 looked at a queue for oral surgery; is that</p> <p>15 correct?</p> <p>16 MS. McELROY: Objection, form,</p> <p>17 mischaracterizes previous testimony. You</p> <p>18 can answer if you understand it.</p> <p>19 BY THE WITNESS:</p> <p>20 A I'm not really understanding your</p> <p>21 question.</p> <p>22 BY MR. MORRISSEY:</p> <p>23 Q What don't you understand about it?</p> <p>24 MS. McELROY: Can you rephrase it?</p>

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16 (Pages 58 to 61)

<p style="text-align: right;">Page 58</p> <p>1 She just said she doesn't understand.</p> <p>2 MR. MORRISSEY: Peggy, can you repeat</p> <p>3 the question?</p> <p>4 (WHEREUPON, the record was</p> <p>5 read as requested.)</p> <p>6 MS. McELROY: Objection to the form.</p> <p>7 BY THE WITNESS:</p> <p>8 A Why do you say the first</p> <p>9 conversation? I'm a little confused.</p> <p>10 MS. McELROY: Okay. If you're</p> <p>11 confused, tell him.</p> <p>12 BY THE WITNESS:</p> <p>13 A Why are you saying the first</p> <p>14 conversation?</p> <p>15 BY MR. MORRISSEY:</p> <p>16 Q Okay. You had a conversation two or</p> <p>17 three weeks ago with Ms. Bowers about the tele</p> <p>18 appointments --</p> <p>19 A Yes.</p> <p>20 Q -- for oral surgery, correct?</p> <p>21 A Yes.</p> <p>22 Q Was it during that same conversation</p> <p>23 that Ms. Bowers told you she thought Dr. Qaisi</p> <p>24 reviewed the queue at times?</p>	<p style="text-align: right;">Page 60</p> <p>1 every order.</p> <p>2 BY MR. MORRISSEY:</p> <p>3 Q Are you present when Dr. Qaisi</p> <p>4 reviews orders that are in the queue, the daily</p> <p>5 queue?</p> <p>6 A What do you mean "present"?</p> <p>7 Q Well, have you ever been in the same</p> <p>8 room with Dr. Qaisi when he reviewed orders for</p> <p>9 the oral surgery clinic from Cermak?</p> <p>10 A No.</p> <p>11 Q How do you have personal knowledge as</p> <p>12 far as what Dr. Qaisi does in regards to</p> <p>13 orders, referral orders, from Cermak for</p> <p>14 inmates to be seen at the Stroger oral surgery</p> <p>15 clinic?</p> <p>16 A Because if he reviewed the orders, he</p> <p>17 would type something on request comments, give</p> <p>18 an instruction of scheduling the next available</p> <p>19 appointment. If it's blank, it means it hadn't</p> <p>20 been reviewed by the doctor.</p> <p>21 Q When you schedule patients for the</p> <p>22 ENT clinic, is there always a comment from a</p> <p>23 provider in the ENT clinic in regards to when</p> <p>24 to schedule a patient?</p>
<p style="text-align: right;">Page 59</p> <p>1 A I'm not for sure if it was the same</p> <p>2 day.</p> <p>3 Q Who was present during that</p> <p>4 conversation two or three weeks ago when</p> <p>5 Ms. Bowers told you about the tele appointments</p> <p>6 for oral surgery?</p> <p>7 A Who was present?</p> <p>8 MS. McELROY: Did you hear him? If</p> <p>9 you didn't hear him, you need to tell him.</p> <p>10 BY THE WITNESS:</p> <p>11 A The first word I did not hear.</p> <p>12 BY MR. MORRISSEY:</p> <p>13 Q When you had the conversation with</p> <p>14 Ms. Bowers two or three weeks ago about oral</p> <p>15 surgery, who was present?</p> <p>16 A Shivon and I.</p> <p>17 Q Now, you mentioned at some point in</p> <p>18 time Ms. Bowers told you that she thought</p> <p>19 Dr. Qaisi at times looks at the queue; is that</p> <p>20 fair to say?</p> <p>21 MS. McELROY: Objection to form. You</p> <p>22 can answer.</p> <p>23 BY THE WITNESS:</p> <p>24 A It's something that he does with</p>	<p style="text-align: right;">Page 61</p> <p>1 MS. McELROY: You broke up,</p> <p>2 Mr. Morrissey. I'm sorry. Can you repeat</p> <p>3 that?</p> <p>4 MR. MORRISSEY: Peggy, can you repeat</p> <p>5 the question?</p> <p>6 (WHEREUPON, the record was</p> <p>7 read as requested.)</p> <p>8 MS. McELROY: Objection, form. You</p> <p>9 can answer.</p> <p>10 BY THE WITNESS:</p> <p>11 A That is something new. They just</p> <p>12 started doing that -- I just noticed that maybe</p> <p>13 two weeks ago; two, three weeks ago. It's</p> <p>14 something new. They didn't do that before for</p> <p>15 ENT.</p> <p>16 BY MR. MORRISSEY:</p> <p>17 Q Is it also new in the oral surgery</p> <p>18 clinic that in the queue, there can be a</p> <p>19 comment from one of the providers in the oral</p> <p>20 surgery clinic as far as when to schedule an</p> <p>21 appointment?</p> <p>22 A For oral surgery, it's not new.</p> <p>23 Q If a doctor from oral surgery made a</p> <p>24 comment in a patient's record, would that be</p>

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17 (Pages 62 to 65)

<p style="text-align: right;">Page 62</p> <p>1 something that you could see prior to</p> <p>2 scheduling the appointment?</p> <p>3 MS. McELROY: Objection to form,</p> <p>4 foundation. You can answer.</p> <p>5 BY THE WITNESS:</p> <p>6 A I can only see in the order what</p> <p>7 they're requesting.</p> <p>8 BY MR. MORRISSEY:</p> <p>9 Q In the order -- Let's go back a step.</p> <p>10 Well, let's go to an example, for instance.</p> <p>11 If we pull up -- I would ask you to</p> <p>12 pull up Exhibit 150 for a moment.</p> <p>13 MS. McELROY: 150?</p> <p>14 MR. MORRISSEY: Yeah.</p> <p>15 BY MR. MORRISSEY:</p> <p>16 Q I would ask you to pull up Page 15.</p> <p>17 MS. McELROY: Give me a moment so I</p> <p>18 can pull it up on my computer too. Okay?</p> <p>19 Mr. Morrissey, you said Page 15</p> <p>20 on Exhibit 150?</p> <p>21 MR. MORRISSEY: That's correct. It's</p> <p>22 for Brian Herron.</p> <p>23 MS. McELROY: Okay. We're there.</p> <p>24</p>	<p style="text-align: right;">Page 64</p> <p>1 BY MR. MORRISSEY:</p> <p>2 Q Can you see that there's a Dr. Khan</p> <p>3 that's ordering the referral?</p> <p>4 MS. McELROY: Objection to form and</p> <p>5 foundation.</p> <p>6 BY THE WITNESS:</p> <p>7 A Yes, I see that.</p> <p>8 BY MR. MORRISSEY:</p> <p>9 Q And then there's -- Under that,</p> <p>10 there's orders, correct?</p> <p>11 MS. McELROY: Objection to form and</p> <p>12 foundation. You can answer.</p> <p>13 BY THE WITNESS:</p> <p>14 A I didn't hear. Sorry.</p> <p>15 BY MR. MORRISSEY:</p> <p>16 Q On Page 15, there's a caption:</p> <p>17 Orders?</p> <p>18 A Yes.</p> <p>19 Q When you're opening up the queue to</p> <p>20 schedule a person like Mr. Herron for an</p> <p>21 appointment, do you see the orders?</p> <p>22 A Yes.</p> <p>23 Q So this information would be</p> <p>24 available to you when opening up the queue for</p>
<p style="text-align: right;">Page 63</p> <p>1 BY MR. MORRISSEY:</p> <p>2 Q Ma'am, I'd ask you to look at the top</p> <p>3 of 15 for Mr. Brian Herron.</p> <p>4 A I'm sorry. Could you repeat that?</p> <p>5 Q I would ask you to look at Page 15.</p> <p>6 A Okay.</p> <p>7 Q At Page 15, what is the name of the</p> <p>8 dentist at the Cook County Jail that placed an</p> <p>9 order for oral surgery?</p> <p>10 A I don't see who is requesting the</p> <p>11 request.</p> <p>12 Q Do you see under Event Details?</p> <p>13 MS. McELROY: Are you on Page 15,</p> <p>14 Ms. Macias?</p> <p>15 THE WITNESS: Yes.</p> <p>16 MS. McELROY: Can you ask your</p> <p>17 question again, Mr. Morrissey?</p> <p>18 MR. MORRISSEY: Can you repeat the</p> <p>19 question, Peggy?</p> <p>20 (WHEREUPON, the record was</p> <p>21 read as requested.)</p> <p>22 BY THE WITNESS:</p> <p>23 A Yes, I see it.</p> <p>24</p>	<p style="text-align: right;">Page 65</p> <p>1 Mr. Herron --</p> <p>2 MS. McELROY: Objection, form.</p> <p>3 BY MR. MORRISSEY:</p> <p>4 Q -- dental extraction clinic referral?</p> <p>5 MS. McELROY: Objection, form. You</p> <p>6 can answer. If you're not hearing him, you</p> <p>7 need to let him know because he keeps going</p> <p>8 back and forth. So I know you're giving me</p> <p>9 looks. So if you can't hear him, let him</p> <p>10 know so that he can make sure that you hear</p> <p>11 him. Okay?</p> <p>12 BY THE WITNESS:</p> <p>13 A I'm sorry. Can you repeat that?</p> <p>14 BY MR. MORRISSEY:</p> <p>15 Q Sure. As a scheduler -- If we look</p> <p>16 at this document, it appears that you scheduled</p> <p>17 Mr. Herron for an appointment in the oral</p> <p>18 surgery department.</p> <p>19 MS. McELROY: If you didn't hear him,</p> <p>20 let him know.</p> <p>21 BY THE WITNESS:</p> <p>22 A It cut off. I'm sorry.</p> <p>23 BY MR. MORRISSEY:</p> <p>24 Q Pardon?</p>

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18 (Pages 66 to 69)

<p style="text-align: right;">Page 66</p> <p>1 A It cut off.</p> <p>2 Q Did you schedule Mr. Herron for an</p> <p>3 appointment in the oral surgery department?</p> <p>4 A According to this document, yes, I</p> <p>5 did.</p> <p>6 Q And that was on December 11, 2018?</p> <p>7 A Yes.</p> <p>8 Q My question above that: When you</p> <p>9 scheduled him for an appointment on</p> <p>10 December 11th, 2018, were you able to see the</p> <p>11 orders in the queue?</p> <p>12 A Yes.</p> <p>13 Q Was the information under orders,</p> <p>14 dental extraction clinic referral, did you have</p> <p>15 that information when you scheduled him?</p> <p>16 A Yes.</p> <p>17 Q Did you have the information:</p> <p>18 Referral reason: Surgical extraction?</p> <p>19 A Yes.</p> <p>20 Q Did you have the information:</p> <p>21 Stroger, schedule indicator, when you looked at</p> <p>22 the queue?</p> <p>23 A Yes.</p> <p>24 Q Did you have the information: Cermak</p>	<p style="text-align: right;">Page 68</p> <p>1 foundation. Go ahead.</p> <p>2 BY THE WITNESS:</p> <p>3 A I can't say that every patient should</p> <p>4 have a diagnosis. I don't need it to schedule</p> <p>5 an appointment.</p> <p>6 BY MR. MORRISSEY:</p> <p>7 Q What do you need -- In scheduling</p> <p>8 Mr. Herron for an appointment, what information</p> <p>9 did you need?</p> <p>10 A I only need on the request comments</p> <p>11 saying: Next available appointment.</p> <p>12 Q Where is that information on Page 15?</p> <p>13 A What information?</p> <p>14 Q You said that in order to schedule</p> <p>15 Mr. Herron for an appointment, you needed to</p> <p>16 see request next available appointment. Where</p> <p>17 is that information stated on Page 15 of this</p> <p>18 exhibit?</p> <p>19 A I don't see it.</p> <p>20 Q How did you know when to schedule</p> <p>21 Mr. Herron for an appointment on December 11,</p> <p>22 2018 when his name appeared in the queue?</p> <p>23 A The only thing that I'm looking at,</p> <p>24 on the tab that says request comments, means</p>
<p style="text-align: right;">Page 67</p> <p>1 patient?</p> <p>2 A Yes.</p> <p>3 Q Did you have the information: Refer</p> <p>4 patient to OMFS for extraction 32?</p> <p>5 A Yes.</p> <p>6 Q In addition to what was under the</p> <p>7 orders, did you also have -- typically have a</p> <p>8 diagnosis for Mr. Herron?</p> <p>9 MS. McELROY: Objection to form. You</p> <p>10 can answer if you know.</p> <p>11 BY THE WITNESS:</p> <p>12 A I don't know because I don't read the</p> <p>13 diagnosis. I'm only looking at schedule next</p> <p>14 available appointment. Diagnosis is for the</p> <p>15 doctor that is to see the patient.</p> <p>16 BY MR. MORRISSEY:</p> <p>17 Q But do you have the ability in the</p> <p>18 queue?</p> <p>19 A I can see it.</p> <p>20 Q You can see a diagnosis?</p> <p>21 A Yes.</p> <p>22 Q And for every referral there is a</p> <p>23 diagnosis based upon your experience?</p> <p>24 MS. McELROY: Objection to form and</p>	<p style="text-align: right;">Page 69</p> <p>1 that it was already reviewed by Dr. Qaisi.</p> <p>2 So --</p> <p>3 Q Where does it -- I'm sorry. You can</p> <p>4 complete your comment. I'm sorry. I didn't</p> <p>5 mean to interrupt you.</p> <p>6 A It's okay. On the request comments,</p> <p>7 it would say: Schedule next available</p> <p>8 appointment. That means that it was already</p> <p>9 reviewed by Dr. Qaisi and it's okay to</p> <p>10 schedule.</p> <p>11 Q Where does it say that on Page 15?</p> <p>12 A It's not on this page.</p> <p>13 Q Is it on any page in Exhibit 150?</p> <p>14 Take a few moments.</p> <p>15 MS. McELROY: Well, there's 24 pages</p> <p>16 here, so she's going to need --</p> <p>17 BY MR. MORRISSEY:</p> <p>18 Q Well, take whatever time you need.</p> <p>19 A I went all the way to Page 24. I</p> <p>20 don't see that.</p> <p>21 MR. MORRISSEY: Peggy, can you read</p> <p>22 back her response?</p> <p>23 (WHEREUPON, the record was</p> <p>24 read as requested.)</p>

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19 (Pages 70 to 73)

<p style="text-align: right;">Page 70</p> <p>1 BY MR. MORRISSEY:</p> <p>2 Q Do you see in Exhibit 150 any</p> <p>3 information in regards to the diagnosis for</p> <p>4 Mr. Herron as far as his referral to the oral</p> <p>5 surgery clinic?</p> <p>6 MS. McELROY: Objection to form. You</p> <p>7 can answer.</p> <p>8 BY THE WITNESS:</p> <p>9 A I see extraction of Number 32.</p> <p>10 BY MR. MORRISSEY:</p> <p>11 Q And what page are you looking at?</p> <p>12 A 15.</p> <p>13 Q 15?</p> <p>14 A Yes, it's 15.</p> <p>15 Q Do you see a diagnosis for</p> <p>16 Mr. Herron?</p> <p>17 MS. McELROY: Asked and answered.</p> <p>18 You can answer again.</p> <p>19 BY THE WITNESS:</p> <p>20 A I don't see it.</p> <p>21 BY MR. MORRISSEY:</p> <p>22 Q As far as you're aware, when you look</p> <p>23 at information on the queue, you can pull up</p> <p>24 the diagnosis for a patient that's referred to</p>	<p style="text-align: right;">Page 72</p> <p>1 BY THE WITNESS:</p> <p>2 A I don't remember.</p> <p>3 BY MR. MORRISSEY:</p> <p>4 Q Have you ever scheduled a Cermak</p> <p>5 appointment for the oral surgery department</p> <p>6 where the queue didn't contain the statement:</p> <p>7 Request next available appointment?</p> <p>8 A I remember in the past, but I don't</p> <p>9 have a date.</p> <p>10 Q When was the last time when a patient</p> <p>11 from Cermak had a referral for the oral surgery</p> <p>12 department where the queue for that patient</p> <p>13 didn't say: Request next available</p> <p>14 appointment?</p> <p>15 MS. McELROY: Objection to form.</p> <p>16 BY THE WITNESS:</p> <p>17 A I don't remember.</p> <p>18 BY MR. MORRISSEY:</p> <p>19 Q In the last three months, have you</p> <p>20 ever seen in the queue where a patient who was</p> <p>21 referred from Cermak for an oral surgery</p> <p>22 appointment where the queue under the patient's</p> <p>23 name didn't contain the statement: Request</p> <p>24 next available appointment?</p>
<p style="text-align: right;">Page 71</p> <p>1 the oral surgery clinic?</p> <p>2 A Yes.</p> <p>3 Q And when you pull up a queue and</p> <p>4 schedule a person from Cermak for an</p> <p>5 appointment, in the queue it says: Request</p> <p>6 next available appointment?</p> <p>7 A Yes.</p> <p>8 Q And that's on each and every referral</p> <p>9 that you schedule from Cermak, it will state in</p> <p>10 the queue: Request next available appointment</p> <p>11 for this inmate?</p> <p>12 A Yes.</p> <p>13 Q Have you ever received a referral</p> <p>14 from Cermak for an oral surgery appointment</p> <p>15 which didn't contain in the queue the</p> <p>16 statement: Request next available appointment?</p> <p>17 A Can you repeat it?</p> <p>18 MR. MORRISSEY: Peggy, can you repeat</p> <p>19 the question?</p> <p>20 (WHEREUPON, the record was</p> <p>21 read as requested.)</p> <p>22 MS. McELROY: Objection to form.</p> <p>23 Answer if you know.</p> <p>24</p>	<p style="text-align: right;">Page 73</p> <p>1 A I don't remember.</p> <p>2 Q In the last year, do you remember any</p> <p>3 referral from Cermak for the oral surgery</p> <p>4 department where the queue didn't contain the</p> <p>5 phrase or the statement: Request next</p> <p>6 available appointment?</p> <p>7 A I don't remember.</p> <p>8 Q Is there anything that would refresh</p> <p>9 your memory in regards to a time or an instant</p> <p>10 where the referral from Cermak for an oral</p> <p>11 surgery appointment did not contain in the</p> <p>12 queue: Request the next available appointment?</p> <p>13 MS. McELROY: Objection to form. You</p> <p>14 can answer if you know.</p> <p>15 BY THE WITNESS:</p> <p>16 A I don't remember. I'm sorry.</p> <p>17 BY MR. MORRISSEY:</p> <p>18 Q In the last three years, do you have</p> <p>19 any recollection of a referral from Cermak for</p> <p>20 an oral surgery appointment for a patient where</p> <p>21 the queue under the person's name didn't</p> <p>22 contain the statement: Request next available</p> <p>23 appointment?</p> <p>24 MS. McELROY: Same objection. You</p>

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20 (Pages 74 to 77)

<p style="text-align: right;">Page 74</p> <p>1 can answer.</p> <p>2 BY THE WITNESS:</p> <p>3 A I don't remember.</p> <p>4 BY MR. MORRISSEY:</p> <p>5 Q Anything that would refresh your</p> <p>6 memory?</p> <p>7 A I don't remember.</p> <p>8 Q Anything that would refresh your</p> <p>9 memory in regards to ever scheduling an</p> <p>10 appointment for an inmate at the Cook County</p> <p>11 Jail for the oral surgery department where the</p> <p>12 queue didn't contain the statement: Request</p> <p>13 next available appointment?</p> <p>14 MS. McELROY: Asked and answered.</p> <p>15 You can answer.</p> <p>16 BY THE WITNESS:</p> <p>17 A I can't say for sure if it was an</p> <p>18 inmate or patient from the general public. I</p> <p>19 don't remember.</p> <p>20 BY MR. MORRISSEY:</p> <p>21 Q What -- In the queue when you</p> <p>22 schedule a person for an oral surgery</p> <p>23 appointment from Cermak, is there any statement</p> <p>24 that Dr. Qaisi requested the next available</p>	<p style="text-align: right;">Page 76</p> <p>1 patient's name?</p> <p>2 MS. McELROY: Object to the form.</p> <p>3 You can answer.</p> <p>4 BY THE WITNESS:</p> <p>5 A I'm not really for sure of what</p> <p>6 you're asking me.</p> <p>7 BY MR. MORRISSEY:</p> <p>8 Q Sure. You mentioned that when you</p> <p>9 schedule patients for the oral surgery</p> <p>10 department from Cermak, you schedule them off a</p> <p>11 queue; is that correct?</p> <p>12 A Yes.</p> <p>13 Q The queue contains certain</p> <p>14 information for the inmate; is that true?</p> <p>15 MS. McELROY: Objection to form.</p> <p>16 BY THE WITNESS:</p> <p>17 A Okay.</p> <p>18 BY MR. MORRISSEY:</p> <p>19 Q No, I'm asking you. Does the queue</p> <p>20 contain information for the inmate's -- under</p> <p>21 the inmate's name?</p> <p>22 MS. McELROY: Same objection. You</p> <p>23 can answer.</p> <p>24</p>
<p style="text-align: right;">Page 75</p> <p>1 appointment?</p> <p>2 MS. McELROY: Objection to form. You</p> <p>3 can answer.</p> <p>4 BY THE WITNESS:</p> <p>5 A It's on the request comments.</p> <p>6 BY MR. MORRISSEY:</p> <p>7 Q Pardon?</p> <p>8 A Request comments.</p> <p>9 Q My question is: When there's this</p> <p>10 statement in the queue for a patient where it</p> <p>11 states: Request next available appointment,</p> <p>12 does Dr. Qaisi's name appear next to that in</p> <p>13 the queue?</p> <p>14 A No.</p> <p>15 Q In the last three months for a</p> <p>16 patient that was referred from Cermak for an</p> <p>17 oral surgery appointment, did you ever see</p> <p>18 Dr. Qaisi's name in the queue under an inmate's</p> <p>19 name?</p> <p>20 A I don't remember.</p> <p>21 Q In the last year where there has been</p> <p>22 a referral from Cermak for an oral surgery</p> <p>23 appointment, have you ever seen Dr. Qaisi's</p> <p>24 name specifically in the queue under the</p>	<p style="text-align: right;">Page 77</p> <p>1 BY THE WITNESS:</p> <p>2 A The only thing that I would see is</p> <p>3 Cermak right next to the order to let me know</p> <p>4 that that's an inmate.</p> <p>5 BY MR. MORRISSEY:</p> <p>6 Q So on the queue, it states the</p> <p>7 person's name and if the person was from</p> <p>8 Cermak; is that true?</p> <p>9 A On the order comments, yes.</p> <p>10 Q And the order comments are -- Looking</p> <p>11 at Mr. Herron's Page 15 of Exhibit 150, is that</p> <p>12 what you mean by the "order comments"?</p> <p>13 MS. McELROY: Objection to form and</p> <p>14 foundation. You can answer.</p> <p>15 BY THE WITNESS:</p> <p>16 A Yes, I see it.</p> <p>17 BY MR. MORRISSEY:</p> <p>18 Q So when you scheduled Mr. Herron's</p> <p>19 appointment on December 11th, 2018, tell me</p> <p>20 exactly what information you had before you</p> <p>21 scheduled Mr. Herron for an appointment off of</p> <p>22 the queue.</p> <p>23 MS. McELROY: Objection to form,</p> <p>24 calls for speculation. You can answer if</p>

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21 (Pages 78 to 81)

<p style="text-align: right;">Page 78</p> <p>1 you know.</p> <p>2 BY THE WITNESS:</p> <p>3 A Okay. The patient's name; the date</p> <p>4 it was submitted; the doctor's name that</p> <p>5 requested the referral; the date that I</p> <p>6 scheduled the patient and confirmed it; the</p> <p>7 date that the patient checked in, March 14,</p> <p>8 2019, and was out, March 14, 2019, checked out.</p> <p>9 BY MR. MORRISSEY:</p> <p>10 Q So when you scheduled Mr. Herron on</p> <p>11 December 11th, 2018, his name appeared in the</p> <p>12 queue that day; is that correct?</p> <p>13 A Correct.</p> <p>14 Q Under his name was the date in which</p> <p>15 the referral was made; is that true?</p> <p>16 A Yes.</p> <p>17 Q And the name of the doctor who made</p> <p>18 the referral would be in there also?</p> <p>19 A Yes.</p> <p>20 Q And with that information, you were</p> <p>21 able then to schedule him for an appointment;</p> <p>22 is that fair to say?</p> <p>23 A Yes.</p> <p>24 Q And is that your practice and</p>	<p style="text-align: right;">Page 80</p> <p>1 BY MR. MORRISSEY:</p> <p>2 Q And that would be the orders from the</p> <p>3 dentist at the Cook County Jail, correct?</p> <p>4 A Yes.</p> <p>5 Q And with that information, you then</p> <p>6 request the system to give you the next</p> <p>7 available date for an appointment in the oral</p> <p>8 surgery department?</p> <p>9 A Yes.</p> <p>10 Q And on December 11th, 2018, when you</p> <p>11 requested the next available date for an</p> <p>12 appointment in the oral surgery department,</p> <p>13 what date was given to you?</p> <p>14 MS. McELROY: Objection to form,</p> <p>15 calls for speculation. You can answer.</p> <p>16 BY THE WITNESS:</p> <p>17 A The appointment was March 14 of 2019.</p> <p>18 BY MR. MORRISSEY:</p> <p>19 Q And it's your practice and procedure</p> <p>20 to schedule the next available date for a</p> <p>21 person in the queue from the Cermak -- from</p> <p>22 Cook County Jail?</p> <p>23 MS. McELROY: Objection to form. You</p> <p>24 can answer.</p>
<p style="text-align: right;">Page 79</p> <p>1 procedure that you follow in scheduling</p> <p>2 appointments for Cermak detainees for oral</p> <p>3 surgery appointments?</p> <p>4 MS. McELROY: Objection to form. You</p> <p>5 can answer.</p> <p>6 BY THE WITNESS:</p> <p>7 A Yes.</p> <p>8 BY MR. MORRISSEY:</p> <p>9 Q As far as your job in scheduling</p> <p>10 Mr. Herron or other inmates at the Cook County</p> <p>11 Jail, you need to look at the information under</p> <p>12 orders in order to schedule him for an</p> <p>13 appointment?</p> <p>14 A Yes, I have to see the order.</p> <p>15 Q Okay. So in addition to the inmate's</p> <p>16 name, you have to look at the date in which the</p> <p>17 order was placed, the name of the referring</p> <p>18 doctor or dentist from the jail and the</p> <p>19 doctor's orders; is that correct?</p> <p>20 MS. McELROY: Objection, form. You</p> <p>21 can answer.</p> <p>22 BY THE WITNESS:</p> <p>23 A Yes.</p> <p>24</p>	<p style="text-align: right;">Page 81</p> <p>1 BY THE WITNESS:</p> <p>2 A Yes.</p> <p>3 BY MR. MORRISSEY:</p> <p>4 Q And for the schedule of 2018, was it</p> <p>5 typically a three-month wait for the next</p> <p>6 available appointment for a Cermak referral to</p> <p>7 the oral surgery?</p> <p>8 MS. McELROY: Objection to form,</p> <p>9 calls for speculation. You can answer.</p> <p>10 BY THE WITNESS:</p> <p>11 A It was the next available appointment</p> <p>12 because that's what I do.</p> <p>13 BY MR. MORRISSEY:</p> <p>14 Q Okay. So at that time, in December</p> <p>15 of 2018, the next available appointment was</p> <p>16 three months out; is that fair to say?</p> <p>17 MS. McELROY: Objection to form,</p> <p>18 calls for speculation. Answer, if you</p> <p>19 know.</p> <p>20 BY THE WITNESS:</p> <p>21 A That's what it looks like.</p> <p>22 BY MR. MORRISSEY:</p> <p>23 Q I'm going to have you turn to</p> <p>24 Exhibit 155 now, please. It's a record for a</p>

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22 (Pages 82 to 85)

<p style="text-align: right;">Page 82</p> <p>1 detainee by the name of Nicole Morris. Do you</p> <p>2 have that record in front of you?</p> <p>3 A Yes.</p> <p>4 Q I would ask you to turn to -- from</p> <p>5 Exhibit 155, I would ask you to turn to</p> <p>6 Page 27.</p> <p>7 A What page number?</p> <p>8 Q Page 27.</p> <p>9 A Okay.</p> <p>10 Q Does that record reflect that on</p> <p>11 July 19th, 2018, you scheduled Ms. Morris for</p> <p>12 an appointment in the oral surgery clinic?</p> <p>13 A Yes.</p> <p>14 Q And based upon your practice of</p> <p>15 scheduling the next available appointment, you</p> <p>16 scheduled her two months out on September 17,</p> <p>17 2018; is that true?</p> <p>18 A Yes.</p> <p>19 Q What information did you need on</p> <p>20 July 19th, 2019 to schedule Ms. Morris for an</p> <p>21 appointment in the oral surgery clinic?</p> <p>22 MS. McELROY: Objection to form. You</p> <p>23 can answer if you understand the question.</p> <p>24</p>	<p style="text-align: right;">Page 84</p> <p>1 up, Mr. Morrissey.</p> <p>2 MR. MORRISSEY: Yeah, I'm sorry.</p> <p>3 BY MR. MORRISSEY:</p> <p>4 Q Do you see that in Exhibit 155, the</p> <p>5 comments section as far as the referral from</p> <p>6 Cermak?</p> <p>7 MS. McELROY: What page are you</p> <p>8 looking at?</p> <p>9 MR. MORRISSEY: I'm asking her in</p> <p>10 Exhibit 155, do you see a comments section</p> <p>11 in regards to the referral from Cermak for</p> <p>12 Ms. Morris.</p> <p>13 MS. McELROY: I understand. But is</p> <p>14 there a specific page you're looking at so</p> <p>15 that might help her find it?</p> <p>16 MR. MORRISSEY: Well, I'm asking her</p> <p>17 if she sees that.</p> <p>18 MS. McELROY: Okay. Do you want her</p> <p>19 to look at all 108 pages?</p> <p>20 MR. MORRISSEY: Well, these are</p> <p>21 documents that you turned over to us,</p> <p>22 Ms. McElroy.</p> <p>23 MS. McELROY: There's no dispute in</p> <p>24 that.</p>
<p style="text-align: right;">Page 83</p> <p>1 BY THE WITNESS:</p> <p>2 A The patient's name, the comment about</p> <p>3 Cermak patient, surgical extraction, referral</p> <p>4 reason. That's it.</p> <p>5 BY MR. MORRISSEY:</p> <p>6 Q Can you tell me what you did on</p> <p>7 July 19, 2018 to schedule Ms. Morris for that</p> <p>8 appointment?</p> <p>9 A July 19 of 2018 I scheduled the</p> <p>10 patient, Nicole Morris, for September 17 of</p> <p>11 2018, and she came in and was seen.</p> <p>12 Q Can you describe what you did in</p> <p>13 order to schedule her?</p> <p>14 A What did I do?</p> <p>15 Q Yes.</p> <p>16 A I went in the complete request in the</p> <p>17 Cerner system. I clicked on suggest, clicked</p> <p>18 the next available date, okay, confirmed it and</p> <p>19 it was done.</p> <p>20 Q Now, you mentioned that you needed to</p> <p>21 know that Ms. Morris was a Cermak patient,</p> <p>22 correct, in order to schedule her?</p> <p>23 A It should have been on the comment.</p> <p>24 MS. McELROY: I'm sorry. You broke</p>	<p style="text-align: right;">Page 85</p> <p>1 MR. MORRISSEY: Just July 15th --</p> <p>2 MS. McELROY: I'm just asking if you</p> <p>3 have a specific page.</p> <p>4 MR. MORRISSEY: June 15th, you turned</p> <p>5 over these documents which may or may not</p> <p>6 be complete. So I'm asking her, the</p> <p>7 document that you sent to us, whether or</p> <p>8 not that's complete.</p> <p>9 MS. McELROY: Nobody is disputing</p> <p>10 this document was sent over to you. What</p> <p>11 I'm saying is if you could point to a</p> <p>12 specific place, maybe that would speed the</p> <p>13 process up. That was my only comment to</p> <p>14 you, and what page are you looking at.</p> <p>15 MR. MORRISSEY: Well, I'm looking at</p> <p>16 Page 27.</p> <p>17 MS. McELROY: Thank you.</p> <p>18 BY MR. MORRISSEY:</p> <p>19 Q On Page 27, is there a comments</p> <p>20 section?</p> <p>21 A Okay. What kind of comments am I</p> <p>22 looking for?</p> <p>23 Q Well, you mentioned in the queue when</p> <p>24 there's a referral from Cermak there's normally</p>

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23 (Pages 86 to 89)

<p style="text-align: right;">Page 86</p> <p>1 a comments section?</p> <p>2 A Well, it says: Cermak patient.</p> <p>3 Q Where does it say: Cermak patient?</p> <p>4 A On the order.</p> <p>5 Q I see that. Is that considered the</p> <p>6 comments section?</p> <p>7 A Yes.</p> <p>8 Q Does it say the name of the referring</p> <p>9 dentist?</p> <p>10 MS. McELROY: Objection to form and</p> <p>11 foundation.</p> <p>12 BY THE WITNESS:</p> <p>13 A I don't see the referring doctor's</p> <p>14 name.</p> <p>15 BY MR. MORRISSEY:</p> <p>16 Q Can you make an appointment for a</p> <p>17 Cermak patient if the queue doesn't contain the</p> <p>18 name of the referring dentist?</p> <p>19 MS. McELROY: Objection to form,</p> <p>20 foundation. You can answer if you know.</p> <p>21 BY THE WITNESS:</p> <p>22 A I can say that I would see it, yes.</p> <p>23 BY MR. MORRISSEY:</p> <p>24 Q So looking at this document, it</p>	<p style="text-align: right;">Page 88</p> <p>1 BY THE WITNESS:</p> <p>2 A I'm not for sure.</p> <p>3 BY MR. MORRISSEY:</p> <p>4 Q In July of 2018, based upon your</p> <p>5 recollection, was there usually a two-month</p> <p>6 back -- Strike that.</p> <p>7 As the scheduler for patients from</p> <p>8 Cermak in July of 2018, was generally there a</p> <p>9 two-month wait for a patient to be seen in the</p> <p>10 oral surgery clinic if they were scheduled?</p> <p>11 MS. McELROY: Objection to form,</p> <p>12 foundation.</p> <p>13 MR. MORRISSEY: Let me rephrase the</p> <p>14 question. I appreciate that, Ms. McElroy.</p> <p>15 BY MR. MORRISSEY:</p> <p>16 Q Based upon your recollection in July</p> <p>17 of 2018 when you were scheduling detainees for</p> <p>18 oral surgery appointments, was the next</p> <p>19 available appointment generally two months out?</p> <p>20 MS. McELROY: Objection to form. You</p> <p>21 can answer.</p> <p>22 BY THE WITNESS:</p> <p>23 A That day it was the next available</p> <p>24 appointment that I gave the patient because I</p>
<p style="text-align: right;">Page 87</p> <p>1 doesn't appear to be complete as far as the</p> <p>2 referral from Cermak?</p> <p>3 MS. McELROY: Objection to form and</p> <p>4 foundation. Answer, if you know.</p> <p>5 BY THE WITNESS:</p> <p>6 A It looks totally different from the</p> <p>7 orders that I'm looking at. It looks totally</p> <p>8 different.</p> <p>9 BY MR. MORRISSEY:</p> <p>10 Q The orders that you're looking at,</p> <p>11 generally does it have a diagnosis?</p> <p>12 MS. McELROY: Objection to form.</p> <p>13 BY THE WITNESS:</p> <p>14 A Normally it does, but I can't say</p> <p>15 every patient should or does have a diagnosis.</p> <p>16 I can't for sure say that.</p> <p>17 BY MR. MORRISSEY:</p> <p>18 Q After you schedule a patient from</p> <p>19 Cermak for an appointment, are you able to pull</p> <p>20 up the information at a later date that was on</p> <p>21 the queue?</p> <p>22 MS. McELROY: Objection to form. You</p> <p>23 can answer.</p> <p>24</p>	<p style="text-align: right;">Page 89</p> <p>1 do like to utilize all the slots. They don't</p> <p>2 go wasted.</p> <p>3 BY MR. MORRISSEY:</p> <p>4 Q To your knowledge, in July of 2018,</p> <p>5 did the oral surgery department have a</p> <p>6 template --</p> <p>7 MS. McELROY: Objection, form.</p> <p>8 BY MR. MORRISSEY:</p> <p>9 Q -- for appointments?</p> <p>10 A Yes.</p> <p>11 Q And based upon your recollection in</p> <p>12 July of 2018, did the template provide for two</p> <p>13 patients from Cermak in the morning and two</p> <p>14 patients from Cermak in the afternoon?</p> <p>15 A I can't remember.</p> <p>16 Q When you worked in the -- Did you</p> <p>17 work in the referral center yesterday?</p> <p>18 MS. McELROY: You broke up,</p> <p>19 Mr. Morrissey. I'm sorry.</p> <p>20 BY MR. MORRISSEY:</p> <p>21 Q Yes. Did you work in the referral</p> <p>22 center yesterday?</p> <p>23 A Yes.</p> <p>24 Q Did you schedule any patients from</p>

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24 (Pages 90 to 93)

<p style="text-align: right;">Page 90</p> <p>1 the Cook County Jail for oral surgery</p> <p>2 appointments yesterday?</p> <p>3 A No.</p> <p>4 Q Did you schedule any patients on</p> <p>5 Monday for the oral surgery department at</p> <p>6 Stroger from the jail?</p> <p>7 A No.</p> <p>8 Q When was the last time you scheduled</p> <p>9 detainees for appointments at the oral surgery</p> <p>10 department?</p> <p>11 A Probably two to three weeks ago.</p> <p>12 Q Were you off on vacation the last two</p> <p>13 or three weeks?</p> <p>14 A No.</p> <p>15 Q In the last two or three weeks, that</p> <p>16 would cover most of June, was there some other</p> <p>17 person in the referral center that was</p> <p>18 scheduling appointments for inmates for the</p> <p>19 oral surgery department?</p> <p>20 A No.</p> <p>21 Q Why in the last two or three weeks of</p> <p>22 this year were you not scheduling inmates for</p> <p>23 oral surgery appointments?</p> <p>24 MS. McELROY: Objection, form. You</p>	<p style="text-align: right;">Page 92</p> <p>1 March 17th, 2020 and the present?</p> <p>2 MS. McELROY: Objection to form,</p> <p>3 foundation. You can answer if you know.</p> <p>4 BY THE WITNESS:</p> <p>5 A Yes, I did schedule some patients.</p> <p>6 BY MR. MORRISSEY:</p> <p>7 Q My question is -- You mentioned just</p> <p>8 now that you, during that period of time, you</p> <p>9 scheduled some patients. What were the</p> <p>10 limitations on you during the period when the</p> <p>11 COVID-19 epidemic became prevalent in</p> <p>12 scheduling appointments for the oral surgery</p> <p>13 department?</p> <p>14 MS. McELROY: Objection to form,</p> <p>15 foundation. You can answer.</p> <p>16 BY THE WITNESS:</p> <p>17 A We started not scheduling</p> <p>18 appointments in March, like in the middle of</p> <p>19 March due to the world pandemic. And we</p> <p>20 probably started early part of June. We</p> <p>21 started scheduling some appointments.</p> <p>22 BY MR. MORRISSEY:</p> <p>23 Q All right.</p> <p>24 A Because the clinics were not seeing</p>
<p style="text-align: right;">Page 91</p> <p>1 can answer.</p> <p>2 BY THE WITNESS:</p> <p>3 A My supervisor told me that the clinic</p> <p>4 was going to be working on the schedule. So</p> <p>5 don't touch it, she told me.</p> <p>6 BY MR. MORRISSEY:</p> <p>7 Q By "the clinic," you mean --</p> <p>8 A There were making changes.</p> <p>9 Q By "the clinic," do you mean the oral</p> <p>10 surgery department was working on their</p> <p>11 template?</p> <p>12 A Yes.</p> <p>13 Q During the -- From, let's say,</p> <p>14 March 16th of 2020 up to the present, do you</p> <p>15 know whether or not you were able to schedule</p> <p>16 appointments in the oral surgery department?</p> <p>17 MS. McELROY: Objection to form. You</p> <p>18 can answer.</p> <p>19 BY THE WITNESS:</p> <p>20 A I did schedule some.</p> <p>21 BY MR. MORRISSEY:</p> <p>22 Q To what extent were you able to</p> <p>23 schedule appointments in the oral surgery</p> <p>24 department between the period of, let's say,</p>	<p style="text-align: right;">Page 93</p> <p>1 patients.</p> <p>2 Q In June of 2020, have you scheduled</p> <p>3 any appointments for Cermak patients in the</p> <p>4 oral surgery department?</p> <p>5 A Yes.</p> <p>6 Q When was the last time you scheduled</p> <p>7 a Cermak patient for oral surgery?</p> <p>8 A I don't have a date. It was this</p> <p>9 month.</p> <p>10 Q Do you know what the next available</p> <p>11 appointment date is for a patient that's been</p> <p>12 referred by a dentist at the Cook County Jail?</p> <p>13 A No, I don't.</p> <p>14 Q Do you know if it's more than three</p> <p>15 months out currently for scheduling a patient</p> <p>16 referred by a dentist at the Cook County Jail?</p> <p>17 A It's from 1 to 12 weeks.</p> <p>18 Q What do you base that on, between 1</p> <p>19 and 12 weeks?</p> <p>20 A Yes.</p> <p>21 Q I'm asking you: What do you base</p> <p>22 your answer that currently for scheduling a</p> <p>23 patient referred by a dentist in the Cook</p> <p>24 County Jail the next appointment is either</p>

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<p style="text-align: right;">Page 94</p> <p>1 one -- between 1 to 12 weeks out?</p> <p>2 MS. McELROY: Objection to form. You</p> <p>3 can answer.</p> <p>4 BY THE WITNESS:</p> <p>5 A It's not the same amount of patients</p> <p>6 every week. They're constantly changing the</p> <p>7 schedule. So something can be available next</p> <p>8 week, two weeks, three weeks, four weeks.</p> <p>9 BY MR. MORRISSEY:</p> <p>10 Q Is it fair to say that as you sit</p> <p>11 there -- sit here today, that you don't know</p> <p>12 when the next available appointment is for a</p> <p>13 person that's referred today to the oral</p> <p>14 surgery clinic from Cook County Jail?</p> <p>15 A I don't know because I'm not looking</p> <p>16 at the Cerner system. So I can't say.</p> <p>17 Q Back in January of 2020, did you</p> <p>18 schedule referrals for inmates at the Cook</p> <p>19 County Jail for the oral surgery clinic?</p> <p>20 A Yes.</p> <p>21 Q And in January of 2020, you would</p> <p>22 schedule the inmates off the queue, correct?</p> <p>23 A Yes.</p> <p>24 Q And you would have the same</p>	<p style="text-align: right;">Page 96</p> <p>1 Well, strike that. Let me rephrase the</p> <p>2 question.</p> <p>3 In January of 2020 when you scheduled</p> <p>4 appointments for Cermak patients in the oral</p> <p>5 surgery clinic, do you recall how long a wait</p> <p>6 there was to -- for that person to be seen?</p> <p>7 MS. McELROY: Objection to form. You</p> <p>8 can answer.</p> <p>9 BY THE WITNESS:</p> <p>10 A I don't remember.</p> <p>11 BY MR. MORRISSEY:</p> <p>12 Q Based upon your recollection, from</p> <p>13 January of 2017 up to the present, you would</p> <p>14 always schedule Cermak patients that were</p> <p>15 referred by dentists at the jail for the next</p> <p>16 available appointment in the oral surgery</p> <p>17 clinic; is that correct?</p> <p>18 A Yes.</p> <p>19 Q And based upon your recollection,</p> <p>20 when you scheduled patients from the jail for</p> <p>21 the oral surgery clinic, the wait time was</p> <p>22 generally 10 to 12 weeks?</p> <p>23 MS. McELROY: Objection, form,</p> <p>24 mischaracterizes previous testimony. You</p>
<p style="text-align: right;">Page 95</p> <p>1 information that you described for Ms. Morris</p> <p>2 and Mr. Herron as far as how you would proceed</p> <p>3 to schedule the patients in January of 2020?</p> <p>4 MS. McELROY: Objection, form. You</p> <p>5 can answer.</p> <p>6 BY THE WITNESS:</p> <p>7 A Can you repeat it? I'm sorry.</p> <p>8 BY MR. MORRISSEY:</p> <p>9 Q Sure. You've already described in</p> <p>10 this deposition what information you needed in</p> <p>11 order to schedule Ms. Morris and Mr. Herron for</p> <p>12 oral surgery appointments, correct?</p> <p>13 A Yes.</p> <p>14 Q In January of 2020, did you use the</p> <p>15 same type of information in scheduling</p> <p>16 referrals by dentists at the jail for oral</p> <p>17 surgery appointments?</p> <p>18 MS. McELROY: Objection to form. You</p> <p>19 can answer.</p> <p>20 BY THE WITNESS:</p> <p>21 A Yes.</p> <p>22 BY MR. MORRISSEY:</p> <p>23 Q Do you recall in January of 2020 how</p> <p>24 long a wait for an appointment an inmate --</p>	<p style="text-align: right;">Page 97</p> <p>1 can answer, Ms. Macias.</p> <p>2 BY THE WITNESS:</p> <p>3 A It's normally 1 to 12 weeks away.</p> <p>4 BY MR. MORRISSEY:</p> <p>5 Q Pardon?</p> <p>6 A It's normally 1 to 12 weeks away.</p> <p>7 Q Under what circumstances -- Well,</p> <p>8 strike that.</p> <p>9 In 2017, do you know how many</p> <p>10 appointments each day were provided in the oral</p> <p>11 surgery template for Cermak referrals?</p> <p>12 MS. McELROY: Objection, form. You</p> <p>13 can answer.</p> <p>14 BY THE WITNESS:</p> <p>15 A I don't remember.</p> <p>16 BY MR. MORRISSEY:</p> <p>17 Q Was there a template in 2017 for oral</p> <p>18 surgery appointments?</p> <p>19 A Yes.</p> <p>20 Q On that template in 2017, were there</p> <p>21 spots reserved for patients that were referred</p> <p>22 from Cermak?</p> <p>23 A Yes.</p> <p>24 Q In 2017, do you know whether or not</p>

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26 (Pages 98 to 101)

<p style="text-align: right;">Page 98</p> <p>1 the template provided for more than four</p> <p>2 appointments for Cermak patients on any given</p> <p>3 day?</p> <p>4 A I don't know.</p> <p>5 Q In the year 2018, do you know whether</p> <p>6 or not the template for the oral surgery</p> <p>7 department provided more than four slots a day</p> <p>8 for patients referred by dentists at the jail?</p> <p>9 A I don't remember.</p> <p>10 Q But in 2018, there was a template</p> <p>11 that had limited spots for Cermak employees --</p> <p>12 Cermak patients that were referred by the jail</p> <p>13 dentists?</p> <p>14 A I don't remember.</p> <p>15 Q Anything that would refresh your</p> <p>16 memory?</p> <p>17 A I don't keep track of that. I don't</p> <p>18 remember.</p> <p>19 Q The question is: Is there any</p> <p>20 document that you could look at that would</p> <p>21 refresh your memory?</p> <p>22 MS. McELROY: Asked and answered.</p> <p>23 You can answer again.</p> <p>24</p>	<p style="text-align: right;">Page 100</p> <p>1 A I don't remember.</p> <p>2 Q In the year 2020, do you have any</p> <p>3 recollection of being able to schedule a</p> <p>4 patient off the queue who was referred by a</p> <p>5 dentist at the Cook County Jail to be seen</p> <p>6 within a four-week period?</p> <p>7 A I don't remember.</p> <p>8 Q Do you have any recollection of being</p> <p>9 able to schedule an appointment for a Cermak</p> <p>10 patient within a six-week period of that person</p> <p>11 appearing on the queue?</p> <p>12 A I don't remember.</p> <p>13 Q Is there anything that would refresh</p> <p>14 your memory?</p> <p>15 A No.</p> <p>16 Q In the year 2019, do you ever recall</p> <p>17 being able to schedule a patient referred by a</p> <p>18 dentist at the Cook County Jail within two</p> <p>19 weeks of receiving that patient's name on the</p> <p>20 queue?</p> <p>21 A I don't remember.</p> <p>22 Q Is there anything that would refresh</p> <p>23 your memory?</p> <p>24 A No.</p>
<p style="text-align: right;">Page 99</p> <p>1 BY THE WITNESS:</p> <p>2 A No.</p> <p>3 BY MR. MORRISSEY:</p> <p>4 Q In 2019, were there four spots each</p> <p>5 day on the oral surgery template for patients</p> <p>6 referred from the Cook County Jail for oral</p> <p>7 surgery appointments?</p> <p>8 MS. McELROY: Objection, form,</p> <p>9 leading. You can answer if you know.</p> <p>10 BY THE WITNESS:</p> <p>11 A I don't remember.</p> <p>12 BY MR. MORRISSEY:</p> <p>13 Q Anything that would refresh your</p> <p>14 memory?</p> <p>15 A No.</p> <p>16 Q Do you have any recollection in 2020</p> <p>17 of being able to schedule an appointment within</p> <p>18 one week for an inmate who was referred by a</p> <p>19 jail dentist in the oral surgery clinic?</p> <p>20 A I don't remember.</p> <p>21 Q Do you have any recollection in the</p> <p>22 year 2020 of being able to schedule an</p> <p>23 appointment for a Cermak patient within two</p> <p>24 weeks of taking that person off the queue?</p>	<p style="text-align: right;">Page 101</p> <p>1 Q Have you ever been contacted -- Since</p> <p>2 2017 to the present, have you ever been</p> <p>3 contacted by any Cermak employee to schedule a</p> <p>4 detainee for an appointment in the oral surgery</p> <p>5 department within one week?</p> <p>6 A No.</p> <p>7 Q Have you ever been contacted by any</p> <p>8 Cermak employee from 2017 to the present to</p> <p>9 schedule a detainee for an oral surgery</p> <p>10 appointment within a four-week period?</p> <p>11 A No.</p> <p>12 Q Have you ever been contacted by a</p> <p>13 Cermak employee to schedule a patient for an</p> <p>14 oral surgery appointment during the last three</p> <p>15 years?</p> <p>16 A No.</p> <p>17 Q Has Dr. Qaisi ever contacted you to</p> <p>18 schedule a Cermak patient in the time period</p> <p>19 that you scheduled oral surgery appointments?</p> <p>20 A No.</p> <p>21 Q Have you ever been contacted by any</p> <p>22 medical professional from 2017 to the present</p> <p>23 to schedule a Cermak patient for an oral</p> <p>24 surgery appointment?</p>

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27 (Pages 102 to 105)

Page 102	Page 104
<p>1 A No.</p> <p>2 Q Do you have any personal knowledge in</p> <p>3 regards to how many patients from Cermak can be</p> <p>4 placed on the queue -- I'm sorry. Let me</p> <p>5 rephrase the question.</p> <p>6 Do you have any personal knowledge in</p> <p>7 regards to the decision to limit the number of</p> <p>8 patients from Cermak on the template for the</p> <p>9 oral surgery department?</p> <p>10 MS. McELROY: Mr. Morrissey, I'm</p> <p>11 sorry. You broke up.</p> <p>12 MR. MORRISSEY: Sure.</p> <p>13 BY MR. MORRISSEY:</p> <p>14 Q All right. Let me rephrase the</p> <p>15 question.</p> <p>16 From 2017 to the present, the oral</p> <p>17 surgery, to your knowledge, has a template for</p> <p>18 scheduling appointments; is that true?</p> <p>19 A Yes.</p> <p>20 Q Have you participated in any</p> <p>21 discussion in regards to creating that template</p> <p>22 for oral surgery appointments?</p> <p>23 A No.</p> <p>24 Q Has anybody asked you to provide any</p>	<p>1 would suggest we take maybe, like, a</p> <p>2 ten-minute break. I don't have all that</p> <p>3 much more questions. Do you have a lot of</p> <p>4 questions?</p> <p>5 MS. McELROY: I don't know. I don't</p> <p>6 think I'm going to have very many.</p> <p>7 MR. MORRISSEY: Why don't we take a</p> <p>8 ten-minute break?</p> <p>9 MS. McELROY: Okay.</p> <p>10 MR. MORRISSEY: I don't think I have</p> <p>11 an hour more of questions.</p> <p>12 MS. McELROY: Okay. Sounds good.</p> <p>13 We'll be back in ten.</p> <p>14 (WHEREUPON, a short break</p> <p>15 was had.)</p> <p>16 MR. MORRISSEY: So at 12:39 we said</p> <p>17 we were going to take a ten-minute break.</p> <p>18 It's now 1:12.</p> <p>19 MS. McELROY: I'm sorry. We went for</p> <p>20 a walk. I'm sorry. We needed to get some</p> <p>21 fresh air.</p> <p>22 MR. MORRISSEY: All right. In any</p> <p>23 event -- Are we back on the record, Peggy?</p> <p>24 THE REPORTER: Yes.</p>
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<p>1 input in regards to designing the template for</p> <p>2 oral surgery appointments?</p> <p>3 A No.</p> <p>4 Q Have you ever been asked by any</p> <p>5 Stroger supervisor or provider in regards to</p> <p>6 the demand from Cermak for oral surgery</p> <p>7 appointments?</p> <p>8 A I'm sorry. Can you repeat it?</p> <p>9 Q Sure.</p> <p>10 MR. MORRISSEY: Peggy, can you repeat</p> <p>11 it?</p> <p>12 (WHEREUPON, the record was</p> <p>13 read as requested.)</p> <p>14 BY THE WITNESS:</p> <p>15 A No.</p> <p>16 MS. McELROY: Mr. Morrissey, are we</p> <p>17 going to take a lunch break today? How</p> <p>18 long is this dep going to go on?</p> <p>19 MR. MORRISSEY: Do you want to take a</p> <p>20 lunch break?</p> <p>21 MS. McELROY: Well, it depends if you</p> <p>22 have an hour more or -- How much longer do</p> <p>23 you think it's going to go?</p> <p>24 MR. MORRISSEY: Probably about -- I</p>	<p>1 MR. MORRISSEY: For purposes of this</p> <p>2 deposition and the depositions that have</p> <p>3 been taken in Whitney this week, we're</p> <p>4 going to use the same -- we're using the</p> <p>5 same exhibits as we marked in Dr. Murphy's</p> <p>6 deposition, but today I'm using --</p> <p>7 previously used 150 and Exhibit 155 which</p> <p>8 will become part of the record in this case</p> <p>9 as well.</p> <p>10 MS. McELROY: I'm sorry. Did you say</p> <p>11 150 and 155?</p> <p>12 MR. MORRISSEY: 150 and 155.</p> <p>13 MS. McELROY: Okay. Thanks. You</p> <p>14 just broke up for a second.</p> <p>15 BY MR. MORRISSEY:</p> <p>16 Q Ma'am, prior to today's deposition,</p> <p>17 did you look at any records or documents --</p> <p>18 A No.</p> <p>19 Q -- in preparing for -- Pardon?</p> <p>20 A No.</p> <p>21 Q Did you review any transcript prior</p> <p>22 to today's deposition?</p> <p>23 A No.</p> <p>24 Q Specifically, did you review your</p>

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<p style="text-align: right;">Page 106</p> <p>1 testimony from July 19th, 2019 in the Ammons 2 versus Dart case? 3 A What was the question? 4 Q Did you review a transcript of your 5 deposition in the case called Ammons versus 6 Dart which you gave on July 19th, 2019? 7 A I didn't see it. 8 Q I didn't hear your response. 9 MR. MORRISSEY: Peggy, can you read 10 back her response? 11 (WHEREUPON, the record was 12 read as requested.) 13 BY MR. MORRISSEY: 14 Q Do you recall if that deposition you 15 were placed under oath to tell the truth? 16 MS. McELROY: Objection to form. You 17 can answer. 18 BY THE WITNESS: 19 A Yes. 20 BY MR. MORRISSEY: 21 Q And did you give truthful answers on 22 July 19th, 2019 in the Ammons versus Dart case? 23 MS. McELROY: Objection to form. You 24 can answer.</p>	<p style="text-align: right;">Page 108</p> <p>1 A No. 2 Q Did you talk to Shivon Bowers about 3 your testimony today? 4 A Did I talk to her? 5 Q Yes. 6 A She knows that I was scheduled today. 7 Q How does she know you were scheduled 8 for the dep today? 9 A She was informed. 10 Q By you? 11 MS. McELROY: I'm going to object to 12 the form of the question. And if it has 13 anything to do with attorney-client 14 privilege and any conversations that we had 15 with Ms. Bowers or you, you're not to 16 answer that. 17 Do you know the answer to his 18 question? 19 THE WITNESS: No. 20 BY MR. MORRISSEY: 21 Q Now, I'm going to ask you -- You're 22 at Exhibit 39, correct? Do you have that on 23 your laptop? 24 A Yes.</p>
<p style="text-align: right;">Page 107</p> <p>1 BY THE WITNESS: 2 A Yes. 3 BY MR. MORRISSEY: 4 Q I'm going to ask you now to look at 5 Exhibit 39. 6 By the way, prior to today's 7 deposition, have you met with attorneys from 8 the County in preparing for today's deposition? 9 MS. McELROY: You can answer. 10 BY THE WITNESS: 11 A (Indicating.) 12 BY MR. MORRISSEY: 13 Q How many times did you meet with your 14 attorneys prior to today's deposition? 15 MS. McELROY: You can answer. 16 BY THE WITNESS: 17 A I think it was twice. 18 BY MR. MORRISSEY: 19 Q Who was present during those 20 meetings? 21 A Just Lisa McElroy and Sam. 22 Q Was there anybody else present? 23 A No. 24 Q Was Shivon Bowers present?</p>	<p style="text-align: right;">Page 109</p> <p>1 Q And that's a document that was filed 2 in a case called Townsend versus Dart. It's 3 the Defendant's Response to the Plaintiff's 4 Statement of Fact in that case. 5 And if you look at the first 6 paragraph -- 7 MS. McELROY: Mr. Morrissey, I don't 8 mean to interrupt you. I'm so sorry. But 9 I see you're looking up, and when you're 10 looking up your voice is, like, going this 11 way and we're not hearing you. I'm so 12 sorry. 13 MR. MORRISSEY: All right. 14 BY MR. MORRISSEY: 15 Q Do you see below the caption of the 16 case the name of your attorney, Lisa McElroy, 17 as being one of the attorneys that prepared 18 this statement of fact? 19 MS. McELROY: Objection to form and 20 foundation. You can answer. 21 BY THE WITNESS: 22 A Yes. 23 BY MR. MORRISSEY: 24 Q And do you also see that</p>

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<p>1 Mr. Branum [pronunciation] is one of the</p> <p>2 attorneys that responded to the plaintiff's</p> <p>3 statement of the facts in the Townsend case?</p> <p>4 MS. McELROY: Objection to</p> <p>5 foundation.</p> <p>6 BY THE WITNESS:</p> <p>7 A Okay.</p> <p>8 BY MR. MORRISSEY:</p> <p>9 Q I'm asking you, do you see</p> <p>10 Mr. Branum's name in that first paragraph?</p> <p>11 MS. McELROY: I think it's</p> <p>12 Mr. Branum, not Branum [pronunciation].</p> <p>13 MR. MORRISSEY: Mr. Branum. I'm</p> <p>14 sorry. Branum.</p> <p>15 BY THE WITNESS:</p> <p>16 A Yes.</p> <p>17 BY MR. MORRISSEY:</p> <p>18 Q I'm going to ask you to look at</p> <p>19 Paragraph 2 of the County and Mr. Dart's</p> <p>20 response to the plaintiff's statement of fact.</p> <p>21 Are you there?</p> <p>22 Do you see under 2[a] there's a</p> <p>23 statement that says: All electronic referrals</p> <p>24 for Oral Surgery Clinic are received in a queue</p>	<p>1 said objection, undisputed. Do you see that?</p> <p>2 MS. McELROY: Same objection. You</p> <p>3 can answer.</p> <p>4 BY THE WITNESS:</p> <p>5 A Yes.</p> <p>6 BY MR. MORRISSEY:</p> <p>7 Q The next statement, 2[b], states as</p> <p>8 follows: Marcias is the only clerk at the</p> <p>9 Referral Support Center assigned to schedule</p> <p>10 patients from the Jail. Do you see that</p> <p>11 statement?</p> <p>12 MS. McELROY: Same objection. You</p> <p>13 can answer.</p> <p>14 BY THE WITNESS:</p> <p>15 A Yes.</p> <p>16 BY MR. MORRISSEY:</p> <p>17 Q And if we look at the response, there</p> <p>18 was an objection, and the defendants, your</p> <p>19 attorneys who represent the defendants, say</p> <p>20 they don't dispute that fact. Do you see that</p> <p>21 under 2[b]?</p> <p>22 MS. McELROY: I'm going to object to</p> <p>23 the form of the question and also the</p> <p>24 improper nature of asking the witness to</p>
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<p>1 monitored by Juana Marcias [sic], a clerk</p> <p>2 assigned to Stroger Hospital's Referral Support</p> <p>3 Center. Exhibit 3, Marcias Dep 4:22,</p> <p>4 et cetera. Do you see that statement?</p> <p>5 A Okay. I see it.</p> <p>6 Q Now, if we turn to the next page,</p> <p>7 there's a response by the County to that</p> <p>8 statement. Do you see in the County's response</p> <p>9 to 2[a] that there's an objection, and then</p> <p>10 they say they don't dispute that statement?</p> <p>11 MS. McELROY: I'm going to object to</p> <p>12 the form of the question and also the</p> <p>13 improper nature of asking the witness to</p> <p>14 interpret a legal document. You can</p> <p>15 answer.</p> <p>16 BY THE WITNESS:</p> <p>17 A This is something new for me. I</p> <p>18 don't really understand it.</p> <p>19 BY MR. MORRISSEY:</p> <p>20 Q Well, I'm just asking you to look at</p> <p>21 the statement under 2[a] and look at the</p> <p>22 response by your attorneys. There was an</p> <p>23 objection, and then they state under the</p> <p>24 response: Notwithstanding and without waiving</p>	<p>1 interpret a legal document. You can</p> <p>2 answer.</p> <p>3 BY THE WITNESS:</p> <p>4 A I really don't understand it.</p> <p>5 BY MR. MORRISSEY:</p> <p>6 Q Well, I'm not asking you -- Do you</p> <p>7 see where your attorneys state that they don't</p> <p>8 dispute that statement?</p> <p>9 MS. McELROY: Same objection. You</p> <p>10 can answer.</p> <p>11 BY THE WITNESS:</p> <p>12 A Yes.</p> <p>13 BY MR. MORRISSEY:</p> <p>14 Q Under 2[c], there is another</p> <p>15 statement of fact: Macias schedules patients</p> <p>16 based upon the next available date offered by</p> <p>17 the computer. Do you see that statement? Are</p> <p>18 you there?</p> <p>19 I'm just asking you: Do you see the</p> <p>20 statement where they state that you schedule</p> <p>21 based upon the next available date offered by</p> <p>22 the computer? Do you see that statement?</p> <p>23 MS. McELROY: I think she's just</p> <p>24 trying to find it. She's not used to</p>

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<p style="text-align: right;">Page 114</p> <p>1 looking at these types of documents. So</p> <p>2 just give her a moment so she can find it.</p> <p>3 She's never seen this before so she has to</p> <p>4 navigate it.</p> <p>5 BY THE WITNESS:</p> <p>6 A Okay. What page number are you</p> <p>7 looking at?</p> <p>8 BY MR. MORRISSEY:</p> <p>9 Q I'm looking at Page 3 of Exhibit</p> <p>10 Number 39.</p> <p>11 A Okay. What paragraph?</p> <p>12 Q Paragraph [c]. It's up at the top of</p> <p>13 the page.</p> <p>14 A Okay. What am I looking at?</p> <p>15 Q You're looking at the statement that</p> <p>16 says: Marcias schedules patients based upon</p> <p>17 the next available date offered by the</p> <p>18 computer. Do you see that statement?</p> <p>19 A Did you say 3[a]?</p> <p>20 Q I said 3[c] -- or 2[c].</p> <p>21 A 2[c].</p> <p>22 MS. McELROY: Maybe tell her what</p> <p>23 page you're on.</p> <p>24</p>	<p style="text-align: right;">Page 116</p> <p>1 BY THE WITNESS:</p> <p>2 A Yes.</p> <p>3 BY MR. MORRISSEY:</p> <p>4 Q Now, I'm going to ask you to turn to</p> <p>5 Exhibit Number 13. It's a transcript of your</p> <p>6 prior testimony in the Ammons case.</p> <p>7 A Did you say 13?</p> <p>8 Q Exhibit 13, yes. I'd ask you to turn</p> <p>9 to Page 120 of Exhibit 13, which we're going to</p> <p>10 introduce as an exhibit in this deposition</p> <p>11 also.</p> <p>12 A What page?</p> <p>13 Q Well, let's start at Page 119. In</p> <p>14 the -- How many times have you sat for a</p> <p>15 deposition prior to today's date?</p> <p>16 A This is the second time.</p> <p>17 Q When you were deposed previously on</p> <p>18 July 19, 2019 in the Ammons versus Dart case,</p> <p>19 were you represented by Ms. McElroy in that</p> <p>20 deposition?</p> <p>21 A Yes.</p> <p>22 Q And on Page 119 of that deposition</p> <p>23 transcript, Ms. McElroy had a chance to ask you</p> <p>24 some questions. Do you recall that?</p>
<p style="text-align: right;">Page 115</p> <p>1 BY MR. MORRISSEY:</p> <p>2 Q I'm on Page 3 of Exhibit 39.</p> <p>3 A Yes. I'm sorry.</p> <p>4 Q And on the same page in the response</p> <p>5 under [c], Defendants Cook County and Mr. Dart</p> <p>6 object, and then they say: Notwithstanding and</p> <p>7 without waiving said objection, undisputed. Do</p> <p>8 you see that?</p> <p>9 A Yes.</p> <p>10 Q Finally the top of that same page</p> <p>11 under 2[d]: All appointments, according to</p> <p>12 Ms. Marcias, are scheduled 10 to 12 weeks away</p> <p>13 and no independent judgment is exercised to</p> <p>14 schedule an appointment. Do you see that</p> <p>15 statement?</p> <p>16 A Yes.</p> <p>17 Q And your attorneys for Cook County</p> <p>18 and Mr. Dart under [d] responded. They had an</p> <p>19 objection, and then they stated:</p> <p>20 Notwithstanding and without waiving said</p> <p>21 objection, undisputed. Do you see that</p> <p>22 statement by your attorneys?</p> <p>23 MS. McELROY: Objection, form. You</p> <p>24 can answer.</p>	<p style="text-align: right;">Page 117</p> <p>1 A Yes.</p> <p>2 Q I would ask you to turn to Page 120,</p> <p>3 which is the next page. On Line 4 on Page 120,</p> <p>4 do you see that?</p> <p>5 A Yes.</p> <p>6 Q Do you recall Ms. McElroy asking you</p> <p>7 this question under oath: When you receive an</p> <p>8 order in Cerner from a dentist at Cermak Health</p> <p>9 Service at the Cook County Jail to schedule a</p> <p>10 detainee for oral surgery at Stroger, after you</p> <p>11 receive the order, how soon do you schedule the</p> <p>12 detainee? Answer: The appointment is 10 to</p> <p>13 12 weeks away.</p> <p>14 Was that question asked of you under</p> <p>15 oath by Ms. McElroy on July 19, 2019?</p> <p>16 MS. McELROY: Objection to the form</p> <p>17 of the question. You can answer.</p> <p>18 BY THE WITNESS:</p> <p>19 A Yes.</p> <p>20 BY MR. MORRISSEY:</p> <p>21 Q And did you give that response?</p> <p>22 A Yes, I did.</p> <p>23 Q And was that truthful? Were you</p> <p>24 telling the truth then on July 19, 2019?</p>

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<p style="text-align: right;">Page 118</p> <p>1 A That week I went into the Cerner 2 system one to two days before the deposition, 3 and that's what I saw in the system available 4 then. 5 Q My question is: Were you telling the 6 truth in your deposition on July 19th of 2019? 7 MS. McELROY: Objection to form, 8 harassing. You can answer the question. 9 BY THE WITNESS: 10 A I was confused. I have never done a 11 deposition before. 12 BY MR. MORRISSEY: 13 Q My question is: Did you tell the 14 truth on July 19, 2019? 15 MS. McELROY: Objection to form, 16 asked and answered, harassing. You can 17 answer. 18 BY THE WITNESS: 19 A I was confused. 20 BY MR. MORRISSEY: 21 Q So you didn't give a correct answer 22 on July 19, 2019 to the question by your 23 lawyer? 24 A No.</p>	<p style="text-align: right;">Page 120</p> <p>1 BY MR. MORRISSEY: 2 Q I'm sorry. Are we at Page 39? 3 MS. McELROY: Yes. 4 BY MR. MORRISSEY: 5 Q If we look at Line 12 on Page 39 of 6 your deposition, Patrick Morrissey asked you 7 these questions and you gave these responses: 8 Why to your knowledge is there a 9 difference for the first available appointment 10 for a patient in the Cook County Jail compared 11 to the general public? Answer by you: That's 12 what the system gives me. 13 Question: Does the first available 14 date fluctuate? Answer: It's 10 to 12 weeks. 15 Question: For the general public? 16 Answer: For the general public, it could be a 17 little bit more. 18 And if we turn to Page 140 [sic], 19 Line 11. 20 MS. McELROY: Hold on. So we're 21 going back to Page 140 or Page 40? It 22 sounded like 140. 23 MR. MORRISSEY: We're on Page 40, 24 Line 11.</p>
<p style="text-align: right;">Page 119</p> <p>1 Q No, you didn't give the correct 2 answer? 3 A No. 4 Q You mentioned in response to that 5 question, you said you looked in the computer 6 the day before on July 18, 2019; is that 7 correct? 8 MS. McELROY: Objection to form, 9 mischaracterizes the previous testimony. 10 You can answer. 11 BY THE WITNESS: 12 A Yes. 13 BY MR. MORRISSEY: 14 Q And when you looked in the computer 15 on July 18, 2019 in regards to the next 16 available appointment for an inmate at the Cook 17 County Jail, was the next appointment 10 to 18 12 weeks out? 19 A That's what I saw that week. 20 Q Now, I'm going to also ask you to 21 look at Page 39 and 40 of your deposition that 22 you gave under oath. 23 MS. McELROY: 39, right, 24 Mr. Morrissey?</p>	<p style="text-align: right;">Page 121</p> <p>1 BY MR. MORRISSEY: 2 Q Question: In the year 2018, do you 3 know whether the wait time for inmates at the 4 Cook County Jail was longer or shorter than the 5 general public? Answer: It's been the same. 6 Question: The same wait time? 7 Answer: The same wait time, 10 to 12 weeks. 8 Were those questions asked of you in 9 your deposition on July 19th, 2019? 10 MS. McELROY: Objection to form. Go 11 ahead and answer it. 12 BY THE WITNESS: 13 A Yes. 14 BY MR. MORRISSEY: 15 Q And did you give those answers under 16 oath? 17 MS. McELROY: Objection to form. You 18 can answer. 19 BY THE WITNESS: 20 A Yes. 21 BY MR. MORRISSEY: 22 Q I'm going to have you to turn to 23 Page 114 of your deposition. If we look at 24 Page 114, Line 3, Patrick Morrissey asked you</p>

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<p style="text-align: right;">Page 122</p> <p>1 these questions.</p> <p>2 Question: As you sit here today, are</p> <p>3 you confused at all about how inmates at the</p> <p>4 Cook County Jail are referred and scheduled for</p> <p>5 oral surgery appointments? Ms. McElroy made an</p> <p>6 objection, form, foundation, relevance. You</p> <p>7 can answer. You responded: No.</p> <p>8 Question by Patrick Morrissey: Is</p> <p>9 there anything that would affect your ability</p> <p>10 to remember and testify about how inmates who</p> <p>11 are detained at the Cook County Jail are</p> <p>12 scheduled to be seen by an oral surgeon over</p> <p>13 the last two years? Ms. McElroy objected to</p> <p>14 form and foundation. You testified: No.</p> <p>15 Did you -- Were those questions asked</p> <p>16 of you at the deposition on July 19, 2019 and</p> <p>17 did you give those responses under oath?</p> <p>18 A Yes.</p> <p>19 Q And isn't it true that on July 19th,</p> <p>20 2019, it was your understanding that for an</p> <p>21 inmate who was referred to the oral surgery</p> <p>22 department by a dentist at the jail would be</p> <p>23 scheduled 10 to 12 weeks out?</p> <p>24 MS. McELROY: Objection to form,</p>	<p style="text-align: right;">Page 124</p> <p>1 10 to 12 weeks out, correct?</p> <p>2 MS. McELROY: Objection to form,</p> <p>3 calls for speculation. You can answer, if</p> <p>4 you know.</p> <p>5 MR. BRANUM: And it mischaracterizes</p> <p>6 the legal document for that matter.</p> <p>7 MR. MORRISSEY: Mr. Branum, only one</p> <p>8 person can make the objections.</p> <p>9 MR. BRANUM: That's not an objection.</p> <p>10 That's a statement.</p> <p>11 MR. MORRISSEY: Well, it is an</p> <p>12 objection.</p> <p>13 MR. BRANUM: You did mischaracterize</p> <p>14 what that legal -- what that statement said</p> <p>15 in that document. So --</p> <p>16 MR. MORRISSEY: Should we go -- Do</p> <p>17 you want us to go back to it?</p> <p>18 MS. McELROY: No --</p> <p>19 MR. BRANUM: I don't want you to</p> <p>20 mischaracterize the record. That's what I</p> <p>21 don't want you to do.</p> <p>22 MR. MORRISSEY: We can go back --</p> <p>23 MR. BRANUM: That's misleading the</p> <p>24 witness and mischaracterized the record.</p>
<p style="text-align: right;">Page 123</p> <p>1 mischaracterizes previous testimony. You</p> <p>2 can answer.</p> <p>3 BY THE WITNESS:</p> <p>4 A Can you repeat that?</p> <p>5 MR. MORRISSEY: Peggy, can you repeat</p> <p>6 the question?</p> <p>7 (WHEREUPON, the record was</p> <p>8 read as requested.)</p> <p>9 MS. McELROY: Same objections.</p> <p>10 BY THE WITNESS:</p> <p>11 A Yes.</p> <p>12 BY MR. MORRISSEY:</p> <p>13 Q And we looked at Exhibit 39, which</p> <p>14 was the Defendant Cook County and Dart's</p> <p>15 response that they didn't dispute the statement</p> <p>16 that it took -- that -- Let me rephrase the</p> <p>17 question.</p> <p>18 And you see now the statement by Cook</p> <p>19 County and Dart, the Defendant in Townsend</p> <p>20 versus Dart, that those defendants with the</p> <p>21 same lawyers that are representing you today</p> <p>22 didn't dispute that the wait time for an inmate</p> <p>23 to be scheduled for an appointment in the oral</p> <p>24 surgery department at Stroger for an inmate was</p>	<p style="text-align: right;">Page 125</p> <p>1 And so if you do, I will bring it up.</p> <p>2 BY MR. MORRISSEY:</p> <p>3 Q It's your understanding that your</p> <p>4 lawyers didn't dispute that in the Townsend</p> <p>5 case that for a person referred to the oral</p> <p>6 surgery department at Stroger from the jail</p> <p>7 that there was a 10-to-12-week scheduling wait?</p> <p>8 MS. McELROY: I'm going to object</p> <p>9 again on form, foundation. It's improper</p> <p>10 that you're asking a witness to interpret a</p> <p>11 legal document. And you are essentially,</p> <p>12 as Mr. Branum stated, mischaracterizing --</p> <p>13 MR. MORRISSEY: I'm going to object</p> <p>14 to your leading -- to your making an oral</p> <p>15 statement.</p> <p>16 MS. McELROY: I was making an</p> <p>17 objection.</p> <p>18 MR. MORRISSEY: Your objection is</p> <p>19 trying to coach the witness.</p> <p>20 MS. McELROY: No, it is not. You can</p> <p>21 answer, Ms. Macias.</p> <p>22 MR. BRANUM: In that statement, it</p> <p>23 says according to Macias, so that</p> <p>24 disputes --</p>

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<p>1 MR. MORRISSEY: Mr. Branum --</p> <p>2 THE REPORTER: I'm sorry, Mr. Branum.</p> <p>3 I can't hear you from back there.</p> <p>4 MS. McELROY: I think what Mr. Branum</p> <p>5 is attempting to say is that that document</p> <p>6 is according to Ms. Macias.</p> <p>7 MR. BRANUM: On the date of her</p> <p>8 deposition, as it plainly states --</p> <p>9 MR. MORRISSEY: One person, one</p> <p>10 attorney can make the objections in this</p> <p>11 deposition.</p> <p>12 MR. BRANUM: Well, I mean you --</p> <p>13 (Talking over each other.)</p> <p>14 MR. MORRISSEY: One attorney.</p> <p>15 THE REPORTER: I'm sorry. You can't</p> <p>16 talk at the same time.</p> <p>17 MS. McELROY: So Mr. Branum is saying</p> <p>18 that Mr. Morrissey, and now I'm making the</p> <p>19 objection, that Mr. Morrissey --</p> <p>20 MR. BRANUM: It's not an objection.</p> <p>21 (Talking over each other.)</p> <p>22 MR. MORRISSEY: It's not an</p> <p>23 objection.</p> <p>24 THE REPORTER: I'm sorry.</p>	<p>1 Q Okay. And the statement on</p> <p>2 Page [sic] 39 for 2[d] is as follows: All</p> <p>3 appointments, according to Macias, are</p> <p>4 scheduled 10 to 12 weeks away and no</p> <p>5 independent judgment is exercised to schedule</p> <p>6 an appointment.</p> <p>7 And if we look at the response, which</p> <p>8 is the lower portion of that page, there is an</p> <p>9 objection by the attorneys for Cook County and</p> <p>10 then there is a statement: Notwithstanding</p> <p>11 and without waiving said objection, undisputed.</p> <p>12 Do you see that?</p> <p>13 MS. McELROY: Mr. Morrissey, I'm</p> <p>14 going to object again to the form,</p> <p>15 foundation, mischaracterizing this document</p> <p>16 and trying to elicit a legal interpretation</p> <p>17 of the document from a lay witness.</p> <p>18 MR. MORRISSEY: I'm just showing her</p> <p>19 the document --</p> <p>20 MS. McELROY: Then what's the point</p> <p>21 of it?</p> <p>22 MR. MORRISSEY: -- and the admission</p> <p>23 by the defendants that they're not</p> <p>24 disputing that statement.</p>
Page 127	Page 129
<p>1 MR. BRANUM: It's you</p> <p>2 mischaracterizing the record. That needs</p> <p>3 to be on the record how you're</p> <p>4 mischaracterizing.</p> <p>5 BY MR. MORRISSEY:</p> <p>6 Q Let's go back to Exhibit Number 39</p> <p>7 for a moment. Can you pull up Exhibit 39,</p> <p>8 which has been previously admitted into this</p> <p>9 deposition record.</p> <p>10 If we look at 2[b], the statement 2[b],</p> <p>11 are you there?</p> <p>12 MS. McELROY: Mr. Morrissey, I told</p> <p>13 you many times, Ms. Macias has never seen</p> <p>14 this document. She's having a hard time</p> <p>15 reading this document. And when you say</p> <p>16 2[b], she's having difficulty finding it,</p> <p>17 so if you could tell her what page you're</p> <p>18 looking at.</p> <p>19 BY MR. MORRISSEY:</p> <p>20 Q It's on Page 3 of Exhibit Number 39,</p> <p>21 the second statement from the top.</p> <p>22 A Is it Page 39?</p> <p>23 Q It's Exhibit 39.</p> <p>24 A Okay.</p>	<p>1 MS. McELROY: She's not aware --</p> <p>2 BY MR. MORRISSEY:</p> <p>3 Q Do you see that statement?</p> <p>4 MS. McELROY: -- of what this means.</p> <p>5 She's told you that. You can answer again,</p> <p>6 Ms. Macias.</p> <p>7 BY THE WITNESS:</p> <p>8 A I don't know what that means.</p> <p>9 BY MR. MORRISSEY:</p> <p>10 Q But you see the statement by your</p> <p>11 attorneys, correct?</p> <p>12 A Yes.</p> <p>13 Q All right. I'm going to ask you now</p> <p>14 to turn to page -- to Exhibit 41 which we're</p> <p>15 going to admit into evidence in this case, in</p> <p>16 this deposition.</p> <p>17 MS. McELROY: Exhibit 41?</p> <p>18 MR. MORRISSEY: Exhibit 41.</p> <p>19 MS. McELROY: The Stroger referral</p> <p>20 spreadsheet?</p> <p>21 MR. MORRISSEY: It's a spreadsheet</p> <p>22 that was filed in support of our Local</p> <p>23 Rule 26 -- I'm sorry, board of -- Strike</p> <p>24 that.</p>

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34 (Pages 130 to 133)

Page 130	Page 132
<p>1 BY MR. MORRISSEY:</p> <p>2 Q Do you have Exhibit 41 opened?</p> <p>3 MS. McELROY: Yes.</p> <p>4 BY MR. MORRISSEY:</p> <p>5 Q I would ask you to turn to the second</p> <p>6 page of that exhibit. This is a document that</p> <p>7 was tendered by your attorneys in regards to</p> <p>8 the scheduling of inmates referred to the oral</p> <p>9 surgery clinic at Stroger.</p> <p>10 The first name on this list -- Let's</p> <p>11 look at the second name. There is a</p> <p>12 Mr. Buchanan. Do you see that?</p> <p>13 MS. McELROY: Objection to</p> <p>14 foundation.</p> <p>15 BY THE WITNESS:</p> <p>16 A Okay.</p> <p>17 BY MR. MORRISSEY:</p> <p>18 Q And do you see the referring doctor</p> <p>19 is -- or dentist is Dr. Khan?</p> <p>20 MS. McELROY: Objection, foundation.</p> <p>21 BY THE WITNESS:</p> <p>22 A I see it.</p> <p>23 BY MR. MORRISSEY:</p> <p>24 Q And the date it was referred was</p>	<p>1 your practice and procedure, correct?</p> <p>2 MS. McELROY: Objection to form,</p> <p>3 foundation, calls for speculation. And</p> <p>4 this is an incomplete representation of a</p> <p>5 medical record and clear scheduling</p> <p>6 history. Answer if you know.</p> <p>7 BY THE WITNESS:</p> <p>8 A Can you repeat it?</p> <p>9 MR. MORRISSEY: Peggy, can you repeat</p> <p>10 the question?</p> <p>11 (WHEREUPON, the record was</p> <p>12 read as requested.)</p> <p>13 MS. McELROY: Same objections. You</p> <p>14 can answer.</p> <p>15 BY THE WITNESS:</p> <p>16 A Yes.</p> <p>17 BY MR. MORRISSEY:</p> <p>18 Q And at that time there was a four- or</p> <p>19 five-month wait for a person that was referred</p> <p>20 by a dentist at the Cook County Jail to be seen</p> <p>21 by an oral surgeon; is that correct?</p> <p>22 MS. McELROY: I'm going to object to</p> <p>23 the form and foundation. Also, this is not</p> <p>24 a complete scheduling record for this</p>
Page 131	Page 133
<p>1 January 9th, 2017?</p> <p>2 MS. McELROY: Objection, foundation.</p> <p>3 BY THE WITNESS:</p> <p>4 A Yes.</p> <p>5 BY MR. MORRISSEY:</p> <p>6 Q And in January of 2017, you were the</p> <p>7 person in the scheduling department that would</p> <p>8 schedule oral surgery appointments for inmates</p> <p>9 referred by dentists at the jail for oral</p> <p>10 surgery?</p> <p>11 A Yes.</p> <p>12 Q And do you see the date you provided</p> <p>13 for the appointment for Mr. Buchanan was</p> <p>14 May 22nd, 2017?</p> <p>15 MS. McELROY: Objection to form,</p> <p>16 foundation, calls for speculation. This is</p> <p>17 not a complete scheduling record. You can</p> <p>18 answer if you know.</p> <p>19 BY THE WITNESS:</p> <p>20 A I see that.</p> <p>21 BY MR. MORRISSEY:</p> <p>22 Q Okay. And on January 9th or 10th of</p> <p>23 2017, you would have scheduled Mr. Buchanan for</p> <p>24 the next available appointment, according to</p>	<p>1 patient and it's not -- it's</p> <p>2 mischaracterizing the evidence given the</p> <p>3 fact that you're only showing a snippet of</p> <p>4 the information.</p> <p>5 MR. MORRISSEY: Ms. McElroy, this is</p> <p>6 a document --</p> <p>7 MS. McELROY: She can't speculate as</p> <p>8 to the wait time. This is improper.</p> <p>9 MR. MORRISSEY: Ms. McElroy, this is</p> <p>10 a document that you tendered to us pursuant</p> <p>11 to court order.</p> <p>12 MS. McELROY: It is a snapshot of an</p> <p>13 entire scheduling history. It does not</p> <p>14 tell the complete story as you very well</p> <p>15 know this.</p> <p>16 BY MR. MORRISSEY:</p> <p>17 Q Can you answer the question?</p> <p>18 MS. McELROY: If you know,</p> <p>19 Ms. Macias, you can answer the question.</p> <p>20 BY THE WITNESS:</p> <p>21 A What's the question?</p> <p>22 MR. MORRISSEY: You can read back the</p> <p>23 question.</p> <p>24</p>

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35 (Pages 134 to 137)

<p style="text-align: right;">Page 134</p> <p>1 (WHEREUPON, the record was</p> <p>2 read as requested.)</p> <p>3 BY THE WITNESS:</p> <p>4 A I don't know. I don't know. I do</p> <p>5 not remember.</p> <p>6 BY MR. MORRISSEY:</p> <p>7 Q Let's turn to the same exhibit,</p> <p>8 Page [sic] 41. Let's turn to July 19, 2018 for</p> <p>9 the referral request date in this exhibit.</p> <p>10 MS. McELROY: What page are you on</p> <p>11 because there's more than...</p> <p>12 MR. MORRISSEY: Well, we'll get</p> <p>13 there.</p> <p>14 MS. McELROY: Well, there's -- What's</p> <p>15 your Bates numbering at the bottom?</p> <p>16 Exhibit 6, Page 1, Exhibit 41, Page 2.</p> <p>17 This is ridiculous. What page are you</p> <p>18 referring to?</p> <p>19 MR. MORRISSEY: Ms. McElroy, I would</p> <p>20 caution you to characterize questions as</p> <p>21 being ridiculous. You can make an</p> <p>22 objection to form or whatever, but you</p> <p>23 can't make those kinds of comments in a</p> <p>24 deposition.</p>	<p style="text-align: right;">Page 136</p> <p>1 A Yes.</p> <p>2 Q And we previously in this deposition</p> <p>3 looked at the scheduling record for Ms. Morris,</p> <p>4 correct?</p> <p>5 A Yes.</p> <p>6 Q And you see that for Ms. Morris on</p> <p>7 Exhibit 41, there is an entry that she was</p> <p>8 referred by Dr. Khan?</p> <p>9 MS. McELROY: Objection, form,</p> <p>10 foundation. Answer, if you know.</p> <p>11 BY THE WITNESS:</p> <p>12 A Yes.</p> <p>13 BY MR. MORRISSEY:</p> <p>14 Q And the referral date was July 13,</p> <p>15 2018?</p> <p>16 MS. McELROY: Objection to form,</p> <p>17 foundation.</p> <p>18 BY THE WITNESS:</p> <p>19 A Yes.</p> <p>20 BY MR. MORRISSEY:</p> <p>21 Q And you would have been the person</p> <p>22 that scheduled Ms. Nicole Morris because we</p> <p>23 looked at that scheduling record, correct?</p> <p>24 MS. McELROY: Objection to form. You</p>
<p style="text-align: right;">Page 135</p> <p>1 MS. McELROY: It's ridiculous that</p> <p>2 your own exhibit says it's Exhibit 6, page</p> <p>3 whatever, then it's Exhibit 41, page</p> <p>4 whatever. So when you say go to Page X, I</p> <p>5 mean, it's kind of confusing.</p> <p>6 BY MR. MORRISSEY:</p> <p>7 Q I would ask you to turn to the</p> <p>8 referral on this exhibit for Nicole Morris on</p> <p>9 Page 6.</p> <p>10 MS. McELROY: Page 6 of which</p> <p>11 exhibit?</p> <p>12 MR. MORRISSEY: Of Exhibit 41.</p> <p>13 MS. McELROY: Exhibit 41, Page 6.</p> <p>14 I'm going to have to help the witness given</p> <p>15 the fact that your exhibit lists that it's</p> <p>16 Exhibit 6 and Exhibit 41. It's not very</p> <p>17 clear with your conflicting page numbering</p> <p>18 there.</p> <p>19 So this is Exhibit 41, Page 6,</p> <p>20 even though it also says Exhibit 6, Page 5.</p> <p>21 Here you go.</p> <p>22 BY MR. MORRISSEY:</p> <p>23 Q At the top of the page, is there an</p> <p>24 entry for Nicole Morris?</p>	<p style="text-align: right;">Page 137</p> <p>1 can answer.</p> <p>2 BY THE WITNESS:</p> <p>3 A Yes.</p> <p>4 BY MR. MORRISSEY:</p> <p>5 Q And when you scheduled Ms. Morris for</p> <p>6 an appointment in July of 2018, you scheduled</p> <p>7 her for the next available appointment for an</p> <p>8 inmate at the Cook County Jail to be seen in</p> <p>9 the oral surgery department?</p> <p>10 MS. McELROY: Objection to form and</p> <p>11 foundation. You can answer if you know.</p> <p>12 BY THE WITNESS:</p> <p>13 A According to this, I scheduled the</p> <p>14 patient for September 17, 2018. That's less</p> <p>15 than two months.</p> <p>16 BY MR. MORRISSEY:</p> <p>17 Q That was the next available</p> <p>18 appointment you had for an inmate from the Cook</p> <p>19 County Jail in July of 2018?</p> <p>20 A Yes.</p> <p>21 Q And right below that, there's an</p> <p>22 appointment -- there's a Michael Hughes,</p> <p>23 correct? Do you see right below Ms. Morris'</p> <p>24 name there's a Michael Hughes?</p>

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36 (Pages 138 to 141)

<p style="text-align: right;">Page 138</p> <p>1 A Yes.</p> <p>2 Q And that referral was made on</p> <p>3 July 16th, 2018, correct?</p> <p>4 MS. McELROY: Objection, form,</p> <p>5 foundation. You can answer if you know.</p> <p>6 BY THE WITNESS:</p> <p>7 A According to what I'm looking at,</p> <p>8 yes.</p> <p>9 BY MR. MORRISSEY:</p> <p>10 Q And as the scheduler for the oral</p> <p>11 surgery clinic in July of 2018, you scheduled</p> <p>12 Mr. Hughes for the next available appointment?</p> <p>13 MS. McELROY: Objection, form,</p> <p>14 foundation, calls for speculation. You can</p> <p>15 answer if you know.</p> <p>16 BY THE WITNESS:</p> <p>17 A Yes.</p> <p>18 BY MR. MORRISSEY:</p> <p>19 Q And the next available appointment</p> <p>20 for an inmate at the Cook County Jail was</p> <p>21 September 19th, 2018, and you made that</p> <p>22 appointment, correct?</p> <p>23 MS. McELROY: Same objection. You</p> <p>24 can answer.</p>	<p style="text-align: right;">Page 140</p> <p>1 August -- on December 10th, 2018?</p> <p>2 MS. McELROY: Objection, form,</p> <p>3 foundation, calls for speculation. You can</p> <p>4 answer.</p> <p>5 BY THE WITNESS:</p> <p>6 A Yes.</p> <p>7 BY MR. MORRISSEY:</p> <p>8 Q And you scheduled him for the next</p> <p>9 available appointment, correct?</p> <p>10 MS. McELROY: Same objections. You</p> <p>11 can answer.</p> <p>12 BY THE WITNESS:</p> <p>13 A Yes.</p> <p>14 BY MR. MORRISSEY:</p> <p>15 Q And the next available appointment</p> <p>16 was more than three months out, March 14th,</p> <p>17 2019, correct, for Mr. Herron?</p> <p>18 MS. McELROY: Same objections. You</p> <p>19 can answer.</p> <p>20 BY THE WITNESS:</p> <p>21 A Yes.</p> <p>22 BY MR. MORRISSEY:</p> <p>23 Q And as the scheduler, that was the</p> <p>24 earliest date you could get Mr. Herron</p>
<p style="text-align: right;">Page 139</p> <p>1 BY THE WITNESS:</p> <p>2 A Yes.</p> <p>3 BY MR. MORRISSEY:</p> <p>4 Q I would ask you to scroll down</p> <p>5 Exhibit Number 41 until we get to December of</p> <p>6 2018.</p> <p>7 I'm looking at the entry for a Brian</p> <p>8 Herron. Have you come across Brian Herron on</p> <p>9 the third from the top of the page on page --</p> <p>10 it looks like Page 8 of Exhibit 41? Are you on</p> <p>11 Page 8 of Exhibit 41?</p> <p>12 A Yes.</p> <p>13 Q And in this deposition you</p> <p>14 acknowledged that you scheduled for Mr. Herron</p> <p>15 in December of 2018?</p> <p>16 MS. McELROY: Objection, form,</p> <p>17 foundation, calls for speculation. You can</p> <p>18 answer.</p> <p>19 BY THE WITNESS:</p> <p>20 A Yes.</p> <p>21 BY MR. MORRISSEY:</p> <p>22 Q And Dr. Khan, according to this</p> <p>23 exhibit again, referred Mr. Herron for an</p> <p>24 appointment in the oral surgery department on</p>	<p style="text-align: right;">Page 141</p> <p>1 scheduled for an appointment based upon the</p> <p>2 template provided for inmates to be seen in the</p> <p>3 oral surgery department?</p> <p>4 MS. McELROY: Same objections. You</p> <p>5 can answer.</p> <p>6 BY THE WITNESS:</p> <p>7 A Yes.</p> <p>8 BY MR. MORRISSEY:</p> <p>9 Q And right below Mr. Herron, there is</p> <p>10 a Ms. Moss. Do you see the entry for Ms. Moss?</p> <p>11 A Yes.</p> <p>12 Q And Ms. Moss was referred by Dr. Khan</p> <p>13 for an appointment in the oral surgery</p> <p>14 department on December 13th, 2018, correct?</p> <p>15 MS. McELROY: Form, foundation, calls</p> <p>16 for speculation. You can answer if you</p> <p>17 know.</p> <p>18 BY THE WITNESS:</p> <p>19 A Yes.</p> <p>20 BY MR. MORRISSEY:</p> <p>21 Q And you scheduled Ms. Moss for the</p> <p>22 first available appointment, correct?</p> <p>23 MS. McELROY: Same objections.</p> <p>24</p>

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37 (Pages 142 to 145)

<p style="text-align: right;">Page 142</p> <p>1 BY THE WITNESS:</p> <p>2 A Yes.</p> <p>3 BY MR. MORRISSEY:</p> <p>4 Q And the first available appointment</p> <p>5 for a person referred in December of 2018 for</p> <p>6 Ms. Moss was March 15th, 2019, more than three</p> <p>7 months out?</p> <p>8 MS. McELROY: Same objection.</p> <p>9 MR. MORRISSEY: Was there a response?</p> <p>10 THE REPORTER: I didn't hear one.</p> <p>11 BY THE WITNESS:</p> <p>12 A I didn't hear anything.</p> <p>13 MS. McELROY: She didn't hear your</p> <p>14 question. None of us did.</p> <p>15 MR. MORRISSEY: I'm sorry. Can you</p> <p>16 read back the question, Peggy?</p> <p>17 (WHEREUPON, the record was</p> <p>18 read as requested.)</p> <p>19 MS. McELROY: Objection to form,</p> <p>20 foundation, calls for speculation. You can</p> <p>21 answer if you know.</p> <p>22 BY THE WITNESS:</p> <p>23 A According to what I'm looking at,</p> <p>24 that's what it says.</p>	<p style="text-align: right;">Page 144</p> <p>1 the page and look at Aaron Phillips who was</p> <p>2 referred by Dr. Khan on January 18, 2019 -- Do</p> <p>3 you see that entry for Mr. Aaron Phillips?</p> <p>4 A I see it.</p> <p>5 Q And you were the person responsible</p> <p>6 in January of 2019 scheduling appointments for</p> <p>7 the oral surgery clinic for prisoners at the</p> <p>8 Cook County Jail; is that true?</p> <p>9 A Yes.</p> <p>10 Q And the first available appointment</p> <p>11 that you could give Mr. Phillips was on</p> <p>12 April 22nd, 2019 according to the program that</p> <p>13 you used to schedule appointments; is that</p> <p>14 correct?</p> <p>15 A Yes.</p> <p>16 Q And if we look at the entry for</p> <p>17 Clifton Gaitor, G-a-i-t-o-r, there was a</p> <p>18 referral by Dr. Khan on January 29th, 2019.</p> <p>19 You would have been the person to schedule</p> <p>20 Mr. Gaitor for an appointment for the oral</p> <p>21 surgery clinic from the jail?</p> <p>22 MS. McELROY: Objection to form,</p> <p>23 foundation, calls for speculation. You can</p> <p>24 answer.</p>
<p style="text-align: right;">Page 143</p> <p>1 BY MR. MORRISSEY:</p> <p>2 Q Do you have any recollection in</p> <p>3 December of 2018 for scheduling inmates</p> <p>4 referred by a dentist at the jail that there</p> <p>5 were appointments that you could make within a</p> <p>6 week in the oral surgery department?</p> <p>7 A I don't remember.</p> <p>8 Q Would anything refresh your memory?</p> <p>9 A If there was, I would not remember a</p> <p>10 date.</p> <p>11 Q Well, if we look at Exhibit</p> <p>12 Number 41, can you see any entries -- any</p> <p>13 inmates that you scheduled in December of 2018</p> <p>14 for an oral surgery appointment within one week</p> <p>15 of receiving the referral?</p> <p>16 MS. McELROY: Objection, form,</p> <p>17 foundation, calls for speculation.</p> <p>18 THE WITNESS: Do I answer?</p> <p>19 MS. McELROY: If you have an answer.</p> <p>20 BY THE WITNESS:</p> <p>21 A According to what I'm looking at, I</p> <p>22 don't see it. I don't know.</p> <p>23 BY MR. MORRISSEY:</p> <p>24 Q On the same page, if we scroll down</p>	<p style="text-align: right;">Page 145</p> <p>1 BY THE WITNESS:</p> <p>2 A Yes.</p> <p>3 BY MR. MORRISSEY:</p> <p>4 Q And the next available appointment</p> <p>5 was more than three months out on April 25th,</p> <p>6 2019?</p> <p>7 MS. McELROY: Objection to form,</p> <p>8 foundation, calls for speculation. You can</p> <p>9 answer.</p> <p>10 BY THE WITNESS:</p> <p>11 A According to what I'm looking at,</p> <p>12 it's April.</p> <p>13 BY MR. MORRISSEY:</p> <p>14 Q Anything refresh your memory that you</p> <p>15 could have given Mr. Gaitor an earlier</p> <p>16 appointment other than what the computer</p> <p>17 allowed you to make, the appointment in April</p> <p>18 of 2019?</p> <p>19 A I don't know.</p> <p>20 Q If you scroll down further, there is</p> <p>21 an entry for a Calvin Gant. Do you see that?</p> <p>22 And that it was a referral by Dr. Khan on</p> <p>23 February 4th, 2019. Do you see that?</p> <p>24 A Yes.</p>

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38 (Pages 146 to 149)

<p style="text-align: right;">Page 146</p> <p>1 Q And you would have been the person to</p> <p>2 schedule Mr. Gant? You have to answer.</p> <p>3 A Yes.</p> <p>4 Q Did you have any discretion in</p> <p>5 regards to setting a date for Mr. Gant's, a</p> <p>6 prisoner at the jail, appointment for the oral</p> <p>7 surgery appointment?</p> <p>8 MS. McELROY: Objection to form,</p> <p>9 foundation, calls for speculation. You can</p> <p>10 answer if you know.</p> <p>11 BY THE WITNESS:</p> <p>12 A If I scheduled, I gave him the next</p> <p>13 available appointment at the time.</p> <p>14 BY MR. MORRISSEY:</p> <p>15 Q And on February 4th, 2019, the next</p> <p>16 available appointment was May 3rd, 2019?</p> <p>17 MS. McELROY: Objection, form,</p> <p>18 foundation, calls for speculation. You can</p> <p>19 answer.</p> <p>20 BY THE WITNESS:</p> <p>21 A That's what it was at the time.</p> <p>22 BY MR. MORRISSEY:</p> <p>23 Q If we go to the next page, Page 9 of</p> <p>24 Exhibit 41. Can we go to the entry for Joey</p>	<p style="text-align: right;">Page 148</p> <p>1 inmate who was referred by a dentist at the</p> <p>2 Cook County Jail?</p> <p>3 A Yes.</p> <p>4 Q If we go to Page 10 of Exhibit 41.</p> <p>5 MR. MORRISSEY: One moment.</p> <p>6 BY MR. MORRISSEY:</p> <p>7 Q Can we go to Page 10 of Exhibit</p> <p>8 Number 41? Let me know when you get there.</p> <p>9 Are you on Page 10? Are you on</p> <p>10 Page 10 of Exhibit Number 41?</p> <p>11 A Yes.</p> <p>12 Q Do you see there is a -- on the</p> <p>13 second line of Page 10, there's an entry for</p> <p>14 Ms. Kotwica, K-o-t-w-i-c-a?</p> <p>15 A Yes.</p> <p>16 Q And the referral was made by Dr. Khan</p> <p>17 on March 29th, 2019?</p> <p>18 MS. McELROY: Objection, form,</p> <p>19 foundation, calls for speculation. You can</p> <p>20 answer if you know.</p> <p>21 BY THE WITNESS:</p> <p>22 A Yes.</p> <p>23 BY MR. MORRISSEY:</p> <p>24 Q Now, I'm going to ask you to go to</p>
<p style="text-align: right;">Page 147</p> <p>1 Moreno, M-o-r-e-n-o, on March 13, 2019 as far</p> <p>2 as a referral from Dr. Khan. Do you see that?</p> <p>3 A Yes.</p> <p>4 Q And were you responsible for</p> <p>5 scheduling Joey Moreno on March -- sometime</p> <p>6 after March 13, 2019 for an oral surgery</p> <p>7 appointment?</p> <p>8 A If it was in power orders, it was me.</p> <p>9 Q Okay. And you see that there's a --</p> <p>10 you scheduled him on June 6th, 2019?</p> <p>11 A Yes.</p> <p>12 Q Was June 6th, 2019 the next available</p> <p>13 appointment in March of 2019 for Mr. Moreno in</p> <p>14 the oral surgery department?</p> <p>15 MS. McELROY: Objection, form,</p> <p>16 foundation, calls for speculation.</p> <p>17 BY THE WITNESS:</p> <p>18 A According to what I'm looking at,</p> <p>19 that's what it says.</p> <p>20 BY MR. MORRISSEY:</p> <p>21 Q And as the scheduler, you always</p> <p>22 scheduled the person for the next available</p> <p>23 appointment given to you by your computer, is</p> <p>24 that correct, in making an appointment for an</p>	<p style="text-align: right;">Page 149</p> <p>1 Exhibit 154 for a moment.</p> <p>2 MS. McELROY: I'm sorry,</p> <p>3 Mr. Morrissey?</p> <p>4 MR. MORRISSEY: It's Exhibit 154.</p> <p>5 BY MR. MORRISSEY:</p> <p>6 Q I'm going to show you Exhibit 154,</p> <p>7 which we're going to make part of this record.</p> <p>8 It's an appointment record for Ms. Kotwica.</p> <p>9 Are you there?</p> <p>10 MS. McELROY: No.</p> <p>11 BY MR. MORRISSEY:</p> <p>12 Q I'm going to ask you to turn to --</p> <p>13 MS. McELROY: We're not there yet.</p> <p>14 Hang on.</p> <p>15 BY MR. MORRISSEY:</p> <p>16 Q -- Exhibit 154.</p> <p>17 MS. McELROY: We're not there yet.</p> <p>18 All right. You said you had a half hour</p> <p>19 left of questions and it's already 2:15, so</p> <p>20 none of us have had a lunch break. How</p> <p>21 much longer do you think you're going --</p> <p>22 MR. MORRISSEY: Well, you took</p> <p>23 40 minutes, Ms. McElroy. And during those</p> <p>24 40 minutes, I came up with some questions</p>

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39 (Pages 150 to 153)

<p style="text-align: right;">Page 150</p> <p>1 when you said it was 10 minutes.</p> <p>2 MS. McELROY: It was not 40 minutes.</p> <p>3 So how much longer because I'm not going to</p> <p>4 have the witness not have a lunch break?</p> <p>5 MR. MORRISSEY: I think we have about</p> <p>6 20 more minutes.</p> <p>7 MS. McELROY: Do you need to take a</p> <p>8 break for lunch to get something to eat?</p> <p>9 THE WITNESS: (Inaudible.)</p> <p>10 MS. McELROY: If you need to eat, we</p> <p>11 can take a break. Okay?</p> <p>12 BY MR. MORRISSEY:</p> <p>13 Q I would ask you to look at page -- in</p> <p>14 Exhibit 154, Page 19.</p> <p>15 MS. McELROY: Page what of</p> <p>16 Exhibit 154?</p> <p>17 MR. MORRISSEY: Peggy, will you tell</p> <p>18 her where we were?</p> <p>19 (WHEREUPON, the record was</p> <p>20 read as requested.)</p> <p>21 BY MR. MORRISSEY:</p> <p>22 Q Are you on Page 19? Ma'am, are you</p> <p>23 on Page 19 of Exhibit 154?</p> <p>24 A I'm trying.</p>	<p style="text-align: right;">Page 152</p> <p>1 you please repeat your question?</p> <p>2 BY MR. MORRISSEY:</p> <p>3 Q On Page 19, is there a referral from</p> <p>4 Dr. Khan, a dentist at Cermak, for Ms. Kotwica</p> <p>5 for the oral surgery department?</p> <p>6 MS. McELROY: Objection to form and</p> <p>7 foundation. You can answer if you</p> <p>8 understand the question.</p> <p>9 BY THE WITNESS:</p> <p>10 A According to what I'm looking at.</p> <p>11 BY MR. MORRISSEY:</p> <p>12 Q And if we look at the request,</p> <p>13 Dr. Khan requested an oral surgery appointment</p> <p>14 on March 29th, 2019, correct?</p> <p>15 A Yes.</p> <p>16 Q And you scheduled Ms. Kotwica for an</p> <p>17 oral surgery appointment on April 2nd, 2019?</p> <p>18 A Yes.</p> <p>19 Q And pursuant to your policy and</p> <p>20 practice, you asked -- you requested the next</p> <p>21 available appointment in April of 2019 for the</p> <p>22 oral surgery department; is that true?</p> <p>23 A Yes.</p> <p>24 Q And the next available appointment</p>
<p style="text-align: right;">Page 151</p> <p>1 MS. McELROY: Mr. Morrissey, I don't</p> <p>2 think she heard the page number. It might</p> <p>3 be because you're eating that it's not</p> <p>4 coming out very well, but if you could</p> <p>5 articulate the exhibit number and the page</p> <p>6 number without --</p> <p>7 MR. MORRISSEY: We've already said</p> <p>8 it's Page 19.</p> <p>9 BY THE WITNESS:</p> <p>10 A 19. Okay.</p> <p>11 MS. McELROY: Yeah. Well, we didn't</p> <p>12 hear that because you're eating and you're</p> <p>13 chomping. So it's hard to hear what you're</p> <p>14 saying.</p> <p>15 BY MR. MORRISSEY:</p> <p>16 Q Are you at Page 19 now?</p> <p>17 A Okay.</p> <p>18 Q You are?</p> <p>19 A Yes.</p> <p>20 Q See this is a referral for</p> <p>21 Ms. Kotwica from Dr. Khan to be treated in the</p> <p>22 oral surgery department?</p> <p>23 MS. McELROY: I'm sorry,</p> <p>24 Mr. Morrissey. You broke up again. Can</p>	<p style="text-align: right;">Page 153</p> <p>1 that you could give Ms. Kotwica on April 2nd,</p> <p>2 2019 for an oral surgery appointment was what?</p> <p>3 A June 26th of 2019.</p> <p>4 Q And was that consistent with your</p> <p>5 testimony in the Ammons case that it can take</p> <p>6 10 or 12 weeks for an oral surgery appointment?</p> <p>7 MS. McELROY: Objection, form,</p> <p>8 foundation, mischaracterizes the witness'</p> <p>9 previous testimony.</p> <p>10 BY MR. MORRISSEY:</p> <p>11 Q I'm sorry. Is it consistent with</p> <p>12 your testimony that you gave under oath in the</p> <p>13 Ammons case that it takes 10 or 12 weeks before</p> <p>14 you can schedule an appointment for the oral</p> <p>15 surgery department at Stroger?</p> <p>16 MS. McELROY: Same objection. You</p> <p>17 can answer.</p> <p>18 BY THE WITNESS:</p> <p>19 A For that patient, yes.</p> <p>20 BY MR. MORRISSEY:</p> <p>21 Q Further on the page -- I'm sorry. I</p> <p>22 would ask you to turn to Exhibit 159 then.</p> <p>23 Before we get to that, your response</p> <p>24 to my question in regards to Ms. Kotwica, that</p>

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40 (Pages 154 to 157)

<p style="text-align: right;">Page 154</p> <p>1 it was consistent with your testimony in the</p> <p>2 Ammons case that it took 10 or 12 weeks before</p> <p>3 you could schedule an appointment in the oral</p> <p>4 surgery department for that patient, do you</p> <p>5 remember that statement?</p> <p>6 MS. McELROY: Objection, form,</p> <p>7 foundation. You can answer if you know.</p> <p>8 BY THE WITNESS:</p> <p>9 A I don't know.</p> <p>10 BY MR. MORRISSEY:</p> <p>11 Q In April of 2019, did you have the</p> <p>12 ability to schedule Ms. Kotwica for an earlier</p> <p>13 appointment than June 26, 2019 in the oral</p> <p>14 surgery department?</p> <p>15 MS. McELROY: Objection, form,</p> <p>16 foundation, calls for speculation. You can</p> <p>17 answer if you know.</p> <p>18 BY THE WITNESS:</p> <p>19 A I don't remember.</p> <p>20 BY MR. MORRISSEY:</p> <p>21 Q What would refresh your memory? Is</p> <p>22 there anything that would refresh your memory</p> <p>23 in regards to how -- Go ahead.</p> <p>24 A You were cutting off.</p>	<p style="text-align: right;">Page 156</p> <p>1 seen in the oral surgery clinic?</p> <p>2 MS. McELROY: Objection, form,</p> <p>3 foundation, calls for speculation.</p> <p>4 BY THE WITNESS:</p> <p>5 A Whatever the system has, that's</p> <p>6 assigned.</p> <p>7 MR. MORRISSEY: Can you read back the</p> <p>8 last response, Peggy?</p> <p>9 (WHEREUPON, the record was</p> <p>10 read as requested.)</p> <p>11 BY MR. MORRISSEY:</p> <p>12 Q And on April 2nd, 2019, the computer</p> <p>13 system gave you June 26th, 2019 as the earliest</p> <p>14 date that Ms. Kotwica could be scheduled; is</p> <p>15 that correct?</p> <p>16 MS. McELROY: Objection, form,</p> <p>17 foundation, calls for speculation. You can</p> <p>18 answer.</p> <p>19 BY THE WITNESS:</p> <p>20 A Yes.</p> <p>21 BY MR. MORRISSEY:</p> <p>22 Q And I'm going to ask you now -- And</p> <p>23 that would have been true for any other patient</p> <p>24 that you needed to schedule for a -- based upon</p>
<p style="text-align: right;">Page 155</p> <p>1 Q I'm sorry. On April 2nd, 2019, you</p> <p>2 testified you gave Ms. Kotwica the earliest</p> <p>3 appointment possible for an oral surgery</p> <p>4 appointment which was June 26th, 2019, correct?</p> <p>5 MS. McELROY: Objection, form,</p> <p>6 foundation, mischaracterizes previous</p> <p>7 testimony. You can answer if you know the</p> <p>8 answer to his question.</p> <p>9 BY THE WITNESS:</p> <p>10 A I don't know.</p> <p>11 BY MR. MORRISSEY:</p> <p>12 Q On April 2nd, 2019, could you have</p> <p>13 scheduled her for an earlier appointment?</p> <p>14 MS. McELROY: Objection, form,</p> <p>15 foundation, calls for speculation. You can</p> <p>16 answer if you know.</p> <p>17 BY THE WITNESS:</p> <p>18 A I don't have access to scheduling</p> <p>19 urgent slots. I don't even think the clinic</p> <p>20 has them.</p> <p>21 BY MR. MORRISSEY:</p> <p>22 Q Is it true that you can only schedule</p> <p>23 based upon what the computer provides you with</p> <p>24 as far as available dates for prisoners to be</p>	<p style="text-align: right;">Page 157</p> <p>1 a referral from the jail in April of 2019 that</p> <p>2 you had to rely on the computer system as far</p> <p>3 as providing the next available date for an</p> <p>4 appointment --</p> <p>5 MS. McELROY: Objection.</p> <p>6 BY MR. MORRISSEY:</p> <p>7 Q -- is that correct?</p> <p>8 MS. McELROY: Objection to form. You</p> <p>9 can answer.</p> <p>10 BY THE WITNESS:</p> <p>11 A Yes.</p> <p>12 BY MR. MORRISSEY:</p> <p>13 Q I'm going to ask you to turn now to</p> <p>14 page -- I'm sorry, Exhibit 159.</p> <p>15 MS. McELROY: 150 what?</p> <p>16 MR. MORRISSEY: 159.</p> <p>17 BY MR. MORRISSEY:</p> <p>18 Q They're documents in regards to an</p> <p>19 inmate by the name Arnold Scott. And I would</p> <p>20 refer you to Page 18 on Group Exhibit 159.</p> <p>21 Are you on Page 18 of Group</p> <p>22 Exhibit 159? Are you on Page 18 of Group</p> <p>23 Exhibit 159? Looking at Page 18 --</p> <p>24 MS. McELROY: She hasn't found the</p>

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41 (Pages 158 to 161)

<p style="text-align: right;">Page 158</p> <p>1 page yet.</p> <p>2 MR. MORRISSEY: I'm sorry. I thought</p> <p>3 she said she had.</p> <p>4 MS. McELROY: No, she has not located</p> <p>5 the page yet. Take your time, Ms. Macias.</p> <p>6 BY MR. MORRISSEY:</p> <p>7 Q Tell me when you get there.</p> <p>8 A Okay.</p> <p>9 Q All right. On Page [sic] 159 for</p> <p>10 Mr. Scott, does that page reflect that there</p> <p>11 was a referral by Dr. Khan to the oral surgery</p> <p>12 clinic on April 8th, 2019?</p> <p>13 MS. McELROY: Did you hear his</p> <p>14 question?</p> <p>15 BY THE WITNESS:</p> <p>16 A I see that request.</p> <p>17 BY MR. MORRISSEY:</p> <p>18 Q And were you the person that</p> <p>19 scheduled Mr. Scott for an oral surgery</p> <p>20 appointment on April 9th, 2019?</p> <p>21 A Yes.</p> <p>22 Q What did you do to schedule Mr. Scott</p> <p>23 for an appointment?</p> <p>24 A At the time, the system gave me the</p>	<p style="text-align: right;">Page 160</p> <p>1 can answer.</p> <p>2 BY THE WITNESS:</p> <p>3 A That's what I said last time, but I</p> <p>4 misunderstood.</p> <p>5 BY MR. MORRISSEY:</p> <p>6 Q How did you misunderstand the</p> <p>7 question by your own attorney in the deposition</p> <p>8 when you were deposed under oath last time?</p> <p>9 MS. McELROY: Objection, form,</p> <p>10 argumentative, calls for speculation. You</p> <p>11 can answer.</p> <p>12 BY THE WITNESS:</p> <p>13 A I don't know.</p> <p>14 BY MR. MORRISSEY:</p> <p>15 Q How did you misunderstand Patrick</p> <p>16 Morrissey's questions in regards to the time</p> <p>17 that it takes you to set up an appointment for</p> <p>18 a person that was referred from a dentist at</p> <p>19 the jail for you to schedule an appointment in</p> <p>20 the oral surgery department?</p> <p>21 MS. McELROY: Objection to form. You</p> <p>22 can answer if you heard that question,</p> <p>23 Ms. Macias.</p> <p>24</p>
<p style="text-align: right;">Page 159</p> <p>1 next appointment.</p> <p>2 Q And what date did the system give</p> <p>3 you?</p> <p>4 A July 8, 2019.</p> <p>5 Q Is that consistent with your</p> <p>6 understanding that it takes 10 to 12 weeks for</p> <p>7 you to schedule an oral surgery appointment for</p> <p>8 a person who receives a referral from a dentist</p> <p>9 at the Cook County Jail?</p> <p>10 MS. McELROY: Objection, form,</p> <p>11 foundation, mischaracterizes the witness'</p> <p>12 previous testimony. You can answer if you</p> <p>13 know.</p> <p>14 BY THE WITNESS:</p> <p>15 A I don't know.</p> <p>16 BY MR. MORRISSEY:</p> <p>17 Q Why don't you know?</p> <p>18 A We need a day, that's what the system</p> <p>19 had.</p> <p>20 Q And in your prior deposition</p> <p>21 testimony, you said it takes 10 to 12 weeks for</p> <p>22 you to schedule an inmate who was referred for</p> <p>23 an oral surgery appointment, correct?</p> <p>24 MS. McELROY: Objection to form. You</p>	<p style="text-align: right;">Page 161</p> <p>1 BY THE WITNESS:</p> <p>2 A I didn't understand it.</p> <p>3 BY MR. MORRISSEY:</p> <p>4 Q Sure. You were asked not only by</p> <p>5 your own attorney in the Ammons case how long</p> <p>6 does it take -- Let me rephrase the question.</p> <p>7 By your own attorney in the Ammons</p> <p>8 case under oath, you were asked about the --</p> <p>9 your ability to schedule appointments for</p> <p>10 people that were referred by a dentist at the</p> <p>11 Cook County Jail; is that correct?</p> <p>12 MS. McELROY: Objection to form and</p> <p>13 mischaracterizes the previous testimony.</p> <p>14 You can answer.</p> <p>15 BY THE WITNESS:</p> <p>16 A I don't understand. I'm very tired</p> <p>17 already.</p> <p>18 BY MR. MORRISSEY:</p> <p>19 Q Pardon?</p> <p>20 A I'm very tired and hungry.</p> <p>21 MS. McELROY: We need to take a</p> <p>22 break. You had the opportunity to have</p> <p>23 lunch. She has not. It's already 2:34 and</p> <p>24 your 20 minutes are long gone. So...</p>

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42 (Pages 162 to 165)

Page 162	Page 164
<p>1 MR. MORRISSEY: How long do you want</p> <p>2 to take a break for? How long do you want</p> <p>3 to take a break for?</p> <p>4 MS. McELROY: How much longer do you</p> <p>5 have to go? Are you finished with your</p> <p>6 line of questioning?</p> <p>7 MR. MORRISSEY: Probably -- Based</p> <p>8 upon her equivocation, probably another</p> <p>9 hour.</p> <p>10 MR. BRANUM: You said 20 minutes.</p> <p>11 MR. MORRISSEY: Well, she equivocated</p> <p>12 and I'm trying to get -- We're off the</p> <p>13 record.</p> <p>14 (WHEREUPON, a lunch break</p> <p>15 was taken.)</p> <p>16 BY MR. MORRISSEY:</p> <p>17 Q Ms. Macias, are you able to proceed</p> <p>18 now in this deposition?</p> <p>19 A Yes.</p> <p>20 Q Do you have any medical condition</p> <p>21 that would prevent you from proceeding this</p> <p>22 afternoon with this deposition?</p> <p>23 A No.</p> <p>24 MR. MORRISSEY: Peggy, what was the</p>	<p>1 can answer.</p> <p>2 BY THE WITNESS:</p> <p>3 A No.</p> <p>4 MR. MORRISSEY: Was there a response,</p> <p>5 Peggy?</p> <p>6 (WHEREUPON, the record was</p> <p>7 read as requested.)</p> <p>8 BY MR. MORRISSEY:</p> <p>9 Q I'd ask you now to turn to that</p> <p>10 deposition, which I believe is Exhibit 13</p> <p>11 again. And specifically I would ask you to</p> <p>12 turn to Page 90, the questions by Ms. McElroy.</p> <p>13 MS. McELROY: What page,</p> <p>14 Mr. Morrissey?</p> <p>15 MR. MORRISSEY: Page 90.</p> <p>16 BY MR. MORRISSEY:</p> <p>17 Q And I would ask you to look at</p> <p>18 Line 14 on Page 90. Do you see that?</p> <p>19 MR. MORRISSEY: Is there a response?</p> <p>20 THE REPORTER: I didn't hear one.</p> <p>21 BY THE WITNESS:</p> <p>22 A What's the question?</p> <p>23 BY MR. MORRISSEY:</p> <p>24 Q The question is: Do you see Page 90,</p>
Page 163	Page 165
<p>1 response?</p> <p>2 (WHEREUPON, the record was</p> <p>3 read as requested.)</p> <p>4 BY MR. MORRISSEY:</p> <p>5 Q On July 19th, 2019, did you have any</p> <p>6 medical condition at the time of your</p> <p>7 deposition in the Ammons deposition which</p> <p>8 impaired your ability to testify?</p> <p>9 MS. McELROY: Objection, form. You</p> <p>10 can answer.</p> <p>11 BY THE WITNESS:</p> <p>12 A No.</p> <p>13 BY MR. MORRISSEY:</p> <p>14 Q Is there any reason that you can</p> <p>15 think of that you were confused by some of the</p> <p>16 questions by your attorney, Ms. McElroy, during</p> <p>17 the July 19th, 2019 deposition?</p> <p>18 A I was confused. Prior to the</p> <p>19 deposition I went in the system and that's what</p> <p>20 I saw and that's why I said that, but it's not</p> <p>21 always the case.</p> <p>22 Q Were you confused by any other</p> <p>23 questions in the July 19th, 2019 deposition?</p> <p>24 MS. McELROY: Objection to form. You</p>	<p>1 Line 14?</p> <p>2 A Yes.</p> <p>3 Q And this question was asked by your</p> <p>4 attorney, Ms. McElroy: Ms. Macias --</p> <p>5 MS. McELROY: Macias.</p> <p>6 BY MR. MORRISSEY:</p> <p>7 Q -- when scheduling a patient, is this</p> <p>8 the screen that you see in Cerner? Answer: If</p> <p>9 I want to see something from the past, that's</p> <p>10 the only -- other than that, I don't have to.</p> <p>11 Question: Ms. Macias, how often do</p> <p>12 you check the resource tab? Answer: When I'm</p> <p>13 looking for something.</p> <p>14 Question: Why would you go looking</p> <p>15 in the resource tab when scheduling a detainee</p> <p>16 for oral surgery? Answer: I really don't have</p> <p>17 to go in there.</p> <p>18 Did those questions by your attorney,</p> <p>19 Ms. McElroy, in the Ammons deposition confuse</p> <p>20 you?</p> <p>21 A Can I read before that?</p> <p>22 Q Sure. Take your time.</p> <p>23 A Well, I'm only looking at the screen.</p> <p>24 I would not remember that deposition. All the</p>

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43 (Pages 166 to 169)

<p style="text-align: right;">Page 166</p> <p>1 questions that I was asked, how can I remember 2 every detail? 3 Q Well, Ms. McElroy asked you the 4 question on Page 90, Line 22: Why would you go 5 looking in the resource tab when scheduling a 6 detainee for oral surgery? And on 91, you 7 answered: I really don't have to go in there. 8 Did you understand her question on 9 July 19th, 2019? 10 MS. McELROY: Objection to form. She 11 already answered this question, so I don't 12 understand why you're asking it again. But 13 you can answer it again. 14 BY THE WITNESS: 15 A I'm not looking at the screen that 16 she was asking me. 17 BY MR. MORRISSEY: 18 Q I didn't ask you that. Is there a 19 resource tab in the screen that you schedule 20 patients? 21 A Well, I'm not looking at the screen, 22 so I don't -- 23 Q I didn't ask you that. I'm asking 24 you a new question.</p>	<p style="text-align: right;">Page 168</p> <p>1 A One second. 2 MR. MORRISSEY: Peggy, did she 3 respond? 4 (WHEREUPON, the record was 5 read as requested.) 6 BY MR. MORRISSEY: 7 Q My question is more specific. For 8 the last three years, you've been scheduling 9 patients referred by dentists at the jail for 10 the oral surgery clinic; is that true? 11 A Yes. 12 MR. MORRISSEY: Was there an answer, 13 Peggy? 14 (WHEREUPON, the record was 15 read as requested.) 16 BY MR. MORRISSEY: 17 Q When you schedule -- As a matter of 18 routine, when you schedule patients who were 19 referred by dentists at the Cook County Jail 20 for oral surgery, do you routinely look at the 21 resource tab prior to setting an appointment 22 for that person at the oral surgery clinic? 23 MS. McELROY: Objection to form, 24 calls for speculation. She's already</p>
<p style="text-align: right;">Page 167</p> <p>1 Is there a resource tab that you 2 could look at in scheduling a patient? 3 A I would need to look at the screen in 4 order to answer that. 5 MR. MORRISSEY: Can you read back her 6 response, Peggy? 7 BY MR. MORRISSEY: 8 Q You're going to have to keep your 9 voice up. 10 (WHEREUPON, the record was 11 read as requested.) 12 BY MR. MORRISSEY: 13 Q So is it correct that when you 14 schedule a patient referred by a dentist at the 15 Cook County Jail, you normally don't look at 16 the resource tab in making that schedule -- 17 scheduled appointment for oral surgery? 18 MS. McELROY: Objection, form. You 19 can answer. 20 BY THE WITNESS: 21 A I would have to look at the screen. 22 BY MR. MORRISSEY: 23 Q Pardon? Do you understand my 24 question?</p>	<p style="text-align: right;">Page 169</p> <p>1 testified that she doesn't have to. 2 MR. MORRISSEY: I object to -- You 3 can object to form, Ms. McElroy. You can't 4 testify for the witness. 5 MS. McELROY: I'm not testifying. 6 I'm making my objection. 7 MR. MORRISSEY: You are. 8 BY THE WITNESS: 9 A I would have to look at the screen 10 to -- 11 BY MR. MORRISSEY: 12 Q Why? Why would you have to look at 13 the screen to tell me what you normally do day 14 in and day out as far as scheduling a patient 15 who was referred by a dentist at the Cook 16 County Jail for an oral surgery appointment? 17 A Because I don't remember that. 18 Q So your response to Ms. McElroy on 19 July 19th, 2019 to that question, your answer 20 was: I really don't have to go in there, 21 meaning the resource tab, you don't know 22 whether that's true or false now today? 23 MS. McELROY: Objection, form, 24 argumentative. You can answer.</p>

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44 (Pages 170 to 173)

Page 170	Page 172
<p>1 BY THE WITNESS:</p> <p>2 A I don't remember.</p> <p>3 BY MR. MORRISSEY:</p> <p>4 Q So is your response to Ms. McElroy's</p> <p>5 question on July 19th, 2019 when she asked you:</p> <p>6 Why would you go looking in the resource tab</p> <p>7 when scheduling a detainee for oral surgery,</p> <p>8 and your response is: I really don't have to</p> <p>9 go in there, is that true or false?</p> <p>10 MS. McELROY: Objection to form. You</p> <p>11 can answer.</p> <p>12 BY THE WITNESS:</p> <p>13 A I don't remember.</p> <p>14 BY MR. MORRISSEY:</p> <p>15 Q And Ms. McElroy's question then</p> <p>16 followed up: So you don't have to access the</p> <p>17 resource tab? And you responded: No, I don't</p> <p>18 have to. To complete my assignment, I don't</p> <p>19 have to.</p> <p>20 Was that response truthful on</p> <p>21 July 19th, 2019 in regards to scheduling a</p> <p>22 referral from the Cook County Jail for an</p> <p>23 appointment in the oral surgery department?</p> <p>24 MS. McELROY: Objection, form,</p>	<p>1 whether for the last three years prior to</p> <p>2 scheduling an inmate who's been referred to the</p> <p>3 oral surgery department by a dentist at the</p> <p>4 jail that you have to look at the resource tab</p> <p>5 on your screen before scheduling it?</p> <p>6 MS. McELROY: Objection to form. You</p> <p>7 can answer.</p> <p>8 BY THE WITNESS:</p> <p>9 A I don't remember.</p> <p>10 BY MR. MORRISSEY:</p> <p>11 Q The question is: Would anything</p> <p>12 refresh your memory whether or not day in and</p> <p>13 day out you look at the resource tab prior to</p> <p>14 scheduling an inmate from the jail for oral</p> <p>15 surgery?</p> <p>16 MS. McELROY: Objection, form,</p> <p>17 argumentative, asked and answered numerous</p> <p>18 times. Her answer is not going to change.</p> <p>19 You can answer again.</p> <p>20 BY THE WITNESS:</p> <p>21 A I don't remember.</p> <p>22 MR. BRANUM: Tom, it would probably</p> <p>23 help if she looked at the screen like she</p> <p>24 said a couple times already.</p>
Page 171	Page 173
<p>1 argumentative. You can answer.</p> <p>2 BY THE WITNESS:</p> <p>3 A I don't remember that question.</p> <p>4 BY MR. MORRISSEY:</p> <p>5 Q But now that you see the question,</p> <p>6 you have the question in front of you, is that</p> <p>7 true or false that you don't have to look in</p> <p>8 the resource tab in order to schedule a person</p> <p>9 referred by a dentist at the jail for the oral</p> <p>10 surgery clinic?</p> <p>11 A I would have to look at the screen.</p> <p>12 I don't remember that at this moment.</p> <p>13 Q So is it fair to say as you sit here</p> <p>14 today in scheduling a person referred by a</p> <p>15 dentist at the jail, you don't recall whether</p> <p>16 or not you look in the resource tab prior to</p> <p>17 scheduling an appointment for oral surgery?</p> <p>18 MS. McELROY: Objection, form, asked</p> <p>19 and answered numerous times now. You can</p> <p>20 answer again.</p> <p>21 BY THE WITNESS:</p> <p>22 A I don't remember.</p> <p>23 BY MR. MORRISSEY:</p> <p>24 Q Would anything refresh your memory</p>	<p>1 BY MR. MORRISSEY:</p> <p>2 Q Do you have on your laptop the screen</p> <p>3 for oral surgery?</p> <p>4 MS. McELROY: No, we don't have</p> <p>5 access to that.</p> <p>6 BY MR. MORRISSEY:</p> <p>7 Q Is it available to you at Stroger?</p> <p>8 MS. McELROY: No, it's not available</p> <p>9 right now.</p> <p>10 MR. MORRISSEY: I'm asking her. I'm</p> <p>11 not asking you, Ms. McElroy.</p> <p>12 MS. McELROY: I'm telling you as her</p> <p>13 attorney, we're not at her office.</p> <p>14 MR. MORRISSEY: This is not your</p> <p>15 deposition.</p> <p>16 MS. McELROY: Oh, I can tell you</p> <p>17 right now that we are not at her office,</p> <p>18 and she doesn't have access to that.</p> <p>19 MR. MORRISSEY: Okay. We'll</p> <p>20 continue, Ms. McElroy.</p> <p>21 BY MR. MORRISSEY:</p> <p>22 Q The next question on Page 91, Line 6</p> <p>23 by Ms. McElroy: When scheduling a detainee for</p> <p>24 oral surgery at Stroger, do you always look at</p>

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<p style="text-align: right;">Page 174</p> <p>1 the orders that are contained in the order tab?</p> <p>2 Answer: No.</p> <p>3 Question: Why not? Because I think</p> <p>4 that's really for the oral surgeon.</p> <p>5 Were you confused when Ms. McElroy</p> <p>6 asked you those questions on July 19th, 2019?</p> <p>7 MS. McELROY: Objection to form. You</p> <p>8 can answer.</p> <p>9 BY THE WITNESS:</p> <p>10 A I was probably confused at the time.</p> <p>11 I was probably confusing orders and diagnosis.</p> <p>12 That's why I don't -- I don't really have to</p> <p>13 read the diagnosis. That's not for me. That's</p> <p>14 for the doctor that is going to see the</p> <p>15 patient.</p> <p>16 MS. McELROY: Did we lose Tom?</p> <p>17 (WHEREUPON, a short break</p> <p>18 was had.)</p> <p>19 (WHEREUPON, the record was</p> <p>20 read as requested.)</p> <p>21 BY MR. MORRISSEY:</p> <p>22 Q Do you have to access the order tab</p> <p>23 in order to schedule a referral from the jail</p> <p>24 for an oral surgery appointment?</p>	<p style="text-align: right;">Page 176</p> <p>1 read the scheduling comments, only the request</p> <p>2 comments from Dr. Qaisi.</p> <p>3 BY MR. MORRISSEY:</p> <p>4 Q The next question that Ms. McElroy</p> <p>5 asked you: So it's not required for you to</p> <p>6 check the scheduling comments when performing</p> <p>7 your duties as a scheduler; is that correct?</p> <p>8 You answered correct.</p> <p>9 Were you confused by that question</p> <p>10 during your deposition on July 19th, 2019?</p> <p>11 A No.</p> <p>12 Q Would you give the same response</p> <p>13 today to that question?</p> <p>14 A Yes.</p> <p>15 Q Next question by Ms. McElroy was:</p> <p>16 Ms. Macias, do you always check the reports tab</p> <p>17 when scheduling a detainee for oral surgery?</p> <p>18 Answer: No.</p> <p>19 And why not? Your answer: It's not</p> <p>20 required.</p> <p>21 Were you confused by Ms. McElroy's</p> <p>22 question, that question on July 19th, 2019?</p> <p>23 MS. McELROY: Objection to form. You</p> <p>24 can answer.</p>
<p style="text-align: right;">Page 175</p> <p>1 A Yes.</p> <p>2 Q Ms. McElroy asked you the following</p> <p>3 question on Page 92: Ms. Macias, do you always</p> <p>4 check the scheduling comments tab when</p> <p>5 scheduling a detainee for oral surgery?</p> <p>6 Answer: No.</p> <p>7 Question: Why not? Because I don't</p> <p>8 have to.</p> <p>9 Were you confused by Ms. McElroy's</p> <p>10 questions on July 19th, 2019 in regards to</p> <p>11 accessing the scheduling, the comment -- I'm</p> <p>12 sorry, checking the scheduling tab when</p> <p>13 scheduling an appointment?</p> <p>14 MS. McELROY: Objection to form. You</p> <p>15 can answer.</p> <p>16 BY THE WITNESS:</p> <p>17 A No, I was not confused.</p> <p>18 BY MR. MORRISSEY:</p> <p>19 Q Your response -- You would give the</p> <p>20 same response to that question today?</p> <p>21 MS. McELROY: Objection to form. You</p> <p>22 can answer.</p> <p>23 BY THE WITNESS:</p> <p>24 A Yes. It's not required for me to</p>	<p style="text-align: right;">Page 177</p> <p>1 BY THE WITNESS:</p> <p>2 A No.</p> <p>3 BY MR. MORRISSEY:</p> <p>4 Q So would you give the same response</p> <p>5 today in regards to that question?</p> <p>6 A Yes.</p> <p>7 Q Ms. McElroy asked you the following</p> <p>8 question: Ms. Macias, do you always check the</p> <p>9 booking notes tab when scheduling a detainee</p> <p>10 for oral surgery when you receive a referral</p> <p>11 for oral surgery? Your response was no.</p> <p>12 Question by Ms. McElroy: And why</p> <p>13 not? Answer: Because it's not required to</p> <p>14 perform my duties.</p> <p>15 Did you give that -- Were you</p> <p>16 confused on July 19th, 2019 to that question</p> <p>17 by -- questions by Ms. McElroy?</p> <p>18 MS. McELROY: Objection, form. You</p> <p>19 can answer.</p> <p>20 BY THE WITNESS:</p> <p>21 A No.</p> <p>22 BY MR. MORRISSEY:</p> <p>23 Q Would you give the same response</p> <p>24 today?</p>

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46 (Pages 178 to 181)

<p style="text-align: right;">Page 178</p> <p>1 A Yes.</p> <p>2 Q Question on Page 93: In summary,</p> <p>3 Ms. Macias -- by Ms. McElroy -- you do not have</p> <p>4 to check the resource tab, the order tab, the</p> <p>5 action history tab, the instruction tab, the</p> <p>6 scheduling comments tab -- Strike that. We'll</p> <p>7 go one by one.</p> <p>8 Ms. Macias, it's correct that you do</p> <p>9 not have to access the resource tab when</p> <p>10 scheduling, correct? You answered correct.</p> <p>11 Were you confused by that question?</p> <p>12 MS. McELROY: Objection, form. You</p> <p>13 can answer.</p> <p>14 BY THE WITNESS:</p> <p>15 A I don't remember that.</p> <p>16 BY MR. MORRISSEY:</p> <p>17 Q My question is: Were you confused by</p> <p>18 that question during the deposition?</p> <p>19 MS. McELROY: Objection to form,</p> <p>20 asked and answered. You could answer</p> <p>21 again.</p> <p>22 BY THE WITNESS:</p> <p>23 A I don't remember that.</p> <p>24</p>	<p style="text-align: right;">Page 180</p> <p>1 BY MR. MORRISSEY:</p> <p>2 Q It's on Page 93, Line 15 through</p> <p>3 20 -- through 18. Were you confused by those</p> <p>4 questions by Ms. McElroy and the answer that</p> <p>5 you gave?</p> <p>6 MS. McELROY: She can't even find</p> <p>7 what you're referring to. So maybe, for</p> <p>8 the record, do it again.</p> <p>9 BY MR. MORRISSEY:</p> <p>10 Q Do you want me to read it again,</p> <p>11 Ms. Macias?</p> <p>12 MS. McELROY: It's Macias. I would</p> <p>13 appreciate it if you refer to my client by</p> <p>14 her real name which is Macias, not Macias.</p> <p>15 Macias. It's not Macias, it's Macias.</p> <p>16 BY MR. MORRISSEY:</p> <p>17 Q Okay. Ms. Macias, do you want me</p> <p>18 to -- Do you want me to read the questions</p> <p>19 again?</p> <p>20 A No, you don't have to.</p> <p>21 Q The question is: Were you confused</p> <p>22 during your deposition?</p> <p>23 A I was confused with that question.</p> <p>24 Q Were you confused with the question</p>
<p style="text-align: right;">Page 179</p> <p>1 BY MR. MORRISSEY:</p> <p>2 Q Then the next question: Ms. Macias,</p> <p>3 is it correct that you do not have to access</p> <p>4 the order tab in Cerner when scheduling a</p> <p>5 detainee, correct? Answer: Correct.</p> <p>6 Were you confused by that question</p> <p>7 during the deposition?</p> <p>8 MS. McELROY: Object to form. You</p> <p>9 can answer. I just want to add that the</p> <p>10 transcript speaks for itself.</p> <p>11 BY THE WITNESS:</p> <p>12 A Can you repeat that question?</p> <p>13 MR. MORRISSEY: Peggy, will you</p> <p>14 repeat the question for me?</p> <p>15 (WHEREUPON, the record was</p> <p>16 read as requested.)</p> <p>17 MS. McELROY: Same objection.</p> <p>18 MR. MORRISSEY: Peggy, was there a</p> <p>19 response?</p> <p>20 THE REPORTER: No. I didn't hear one</p> <p>21 yet.</p> <p>22 BY THE WITNESS:</p> <p>23 A I'm trying to find the question and I</p> <p>24 don't see it. What number is that?</p>	<p style="text-align: right;">Page 181</p> <p>1 by Ms. McElroy: Ms. Macias, is it correct that</p> <p>2 you do not have to access the instruction tab</p> <p>3 in Cerner when scheduling a detainee for oral</p> <p>4 surgery, correct? Answer: Correct.</p> <p>5 Were you confused by that question?</p> <p>6 MS. McELROY: Objection, form. The</p> <p>7 transcript speaks for itself. You can</p> <p>8 answer.</p> <p>9 BY THE WITNESS:</p> <p>10 A I don't remember that.</p> <p>11 BY MR. MORRISSEY:</p> <p>12 Q My question is not whether you</p> <p>13 remember it or not.</p> <p>14 A I don't remember that.</p> <p>15 Q My question is whether or not you</p> <p>16 were confused by -- when you gave that answer</p> <p>17 on July 19th, 2019.</p> <p>18 MS. McELROY: Objection, form,</p> <p>19 argumentative, asked and answered. The</p> <p>20 transcript speaks for itself. You can</p> <p>21 answer.</p> <p>22 BY THE WITNESS:</p> <p>23 A I don't remember that.</p> <p>24</p>

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<p style="text-align: right;">Page 182</p> <p>1 BY MR. MORRISSEY:</p> <p>2 Q So you were confused when asked that</p> <p>3 question?</p> <p>4 MS. McELROY: Objection, form,</p> <p>5 mischaracterizes previous testimony. The</p> <p>6 transcript speaks for itself. You can</p> <p>7 answer.</p> <p>8 BY THE WITNESS:</p> <p>9 A I don't remember that.</p> <p>10 BY MR. MORRISSEY:</p> <p>11 Q You don't remember being asked that</p> <p>12 question; is that your response?</p> <p>13 A Yes.</p> <p>14 Q Today if I asked you what Ms. McElroy</p> <p>15 asked you, is it correct that you do not have</p> <p>16 to access the instruction tab in Cerner when</p> <p>17 scheduling a detainee for oral surgery, what</p> <p>18 would your response be?</p> <p>19 MS. McELROY: Objection, form,</p> <p>20 mischaracterizes previous testimony. And</p> <p>21 if you want the answer to that, just look</p> <p>22 at the last transcript. It's right in</p> <p>23 front of you. You can answer.</p> <p>24</p>	<p style="text-align: right;">Page 184</p> <p>1 MR. MORRISSEY: Peggy?</p> <p>2 THE REPORTER: Yes.</p> <p>3 MR. MORRISSEY: I'm back. Was there</p> <p>4 a response to that question?</p> <p>5 (WHEREUPON, the record was</p> <p>6 read as requested.)</p> <p>7 BY MR. MORRISSEY:</p> <p>8 Q So the question is: When you</p> <p>9 schedule an inmate referred by a dentist from</p> <p>10 the jail for oral surgery, do you have to</p> <p>11 access the instruction tab in order to schedule</p> <p>12 the person?</p> <p>13 MS. McELROY: Objection, form, asked</p> <p>14 and answered. The previous transcript</p> <p>15 speaks for itself. You can answer.</p> <p>16 BY THE WITNESS:</p> <p>17 A I don't remember the instructions</p> <p>18 tab.</p> <p>19 BY MR. MORRISSEY:</p> <p>20 Q Ms. Macias, I would ask you to read</p> <p>21 to yourself on Page 94, Lines 5 through 14, the</p> <p>22 questions that were asked and your responses to</p> <p>23 Ms. McElroy's questions.</p> <p>24 A That's correct. I don't have to read</p>
<p style="text-align: right;">Page 183</p> <p>1 BY MR. MORRISSEY:</p> <p>2 Q Can you respond to that?</p> <p>3 A I don't remember.</p> <p>4 Q Pardon?</p> <p>5 A I don't remember that.</p> <p>6 Q So you don't remember now whether or</p> <p>7 not when you schedule an inmate who has been</p> <p>8 referred for oral surgery, whether or not you</p> <p>9 have to look at the instruction tab when</p> <p>10 completing that task; is that what you're</p> <p>11 saying?</p> <p>12 MS. McELROY: Objection to form,</p> <p>13 mischaracterizes previous testimony. You</p> <p>14 can answer if you understand what he's</p> <p>15 asking.</p> <p>16 BY THE WITNESS:</p> <p>17 A I don't understand what you're asking</p> <p>18 me.</p> <p>19 MS. McELROY: Peggy, did we lose</p> <p>20 Mr. Morrissey again?</p> <p>21 THE REPORTER: It looks like it.</p> <p>22 We'll give him a second.</p> <p>23 (WHEREUPON, a discussion</p> <p>24 was held off the record.)</p>	<p style="text-align: right;">Page 185</p> <p>1 any reports tab for access.</p> <p>2 Q Do you have to look at a booking note</p> <p>3 in order to schedule a person --</p> <p>4 A No.</p> <p>5 Q -- for oral surgery who's been</p> <p>6 referred by a dentist at the jail?</p> <p>7 MS. McELROY: Objection, form.</p> <p>8 BY THE WITNESS:</p> <p>9 A I don't have to.</p> <p>10 BY MR. MORRISSEY:</p> <p>11 Q But you weren't confused by those</p> <p>12 questions by Ms. McElroy; is that true?</p> <p>13 A I was not confused.</p> <p>14 Q The next question on Line 15, Page 94</p> <p>15 by Ms. McElroy: Do you have any power as to</p> <p>16 when a detainee is scheduled for oral surgery</p> <p>17 at Stroger Hospital? Your answer was no.</p> <p>18 Were you confused by those -- that</p> <p>19 question by Ms. McElroy in your deposition?</p> <p>20 A No, I was not.</p> <p>21 Q Would your answer be the same today?</p> <p>22 A Yes.</p> <p>23 Q The next question by Ms. McElroy is</p> <p>24 as follows: As a scheduler do you have any</p>

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48 (Pages 186 to 189)

<p style="text-align: right;">Page 186</p> <p>1 power to change a detainee -- Strike that.</p> <p>2 Ms. Macias, do you have -- do you use</p> <p>3 any independent judgment when scheduling a</p> <p>4 detainee for oral surgery at Stroger? That</p> <p>5 means, do you select the time frame in which a</p> <p>6 detainee is scheduled for oral surgery?</p> <p>7 Answer: No.</p> <p>8 Were you confused on July 19th, 2000 --</p> <p>9 July 19th, 2019 when you were asked that</p> <p>10 question by Ms. McElroy?</p> <p>11 MS. McELROY: Objection, form. You</p> <p>12 can answer.</p> <p>13 BY THE WITNESS:</p> <p>14 A No, I was not.</p> <p>15 BY MR. MORRISSEY:</p> <p>16 Q Would your answer remain the same</p> <p>17 today?</p> <p>18 A Yes.</p> <p>19 Q Next question: Who determines when a</p> <p>20 detainee is scheduled for oral surgery after</p> <p>21 you receive a referral from Cermak Health</p> <p>22 Service? There was an objection by</p> <p>23 Mr. Morrissey. Ms. McElroy said: You can</p> <p>24 answer. Your answer was: The Cerner system</p>	<p style="text-align: right;">Page 188</p> <p>1 MS. McELROY: Objection, form, asked</p> <p>2 and answered. You can answer again.</p> <p>3 BY THE WITNESS:</p> <p>4 A It's never happened.</p> <p>5 BY MR. MORRISSEY:</p> <p>6 Q Let me rephrase the question. In</p> <p>7 scheduling a referral from a dentist at the</p> <p>8 Cook County Jail for a prisoner, has Dr. Qaisi</p> <p>9 ever interfered in your scheduling the next</p> <p>10 available appointment in the computer system --</p> <p>11 MS. McELROY: Objection, form.</p> <p>12 BY MR. MORRISSEY:</p> <p>13 Q -- for that person to be seen in the</p> <p>14 oral surgery department?</p> <p>15 MS. McELROY: Objection, form. You</p> <p>16 can answer.</p> <p>17 BY THE WITNESS:</p> <p>18 A No.</p> <p>19 BY MR. MORRISSEY:</p> <p>20 Q Has Dr. Qaisi had any input in the</p> <p>21 last three years in your scheduling inmates who</p> <p>22 have been referred by the oral surgery -- I'm</p> <p>23 sorry. Let me rephrase the question.</p> <p>24 Has Dr. Qaisi had any input in</p>
<p style="text-align: right;">Page 187</p> <p>1 will give me the next available date.</p> <p>2 Were you confused by that question</p> <p>3 posed by Ms. McElroy in the deposition?</p> <p>4 A No, because for dental extractions,</p> <p>5 patients get the next available appointment.</p> <p>6 Q Do you have any discretion when an</p> <p>7 inmate is referred by a dentist at the Cook</p> <p>8 County Jail for an oral surgery appointment as</p> <p>9 far as when to schedule that person?</p> <p>10 A No.</p> <p>11 Q Does the computer provide you with</p> <p>12 the next available date which you automatically</p> <p>13 schedule?</p> <p>14 MS. McELROY: Objection, asked and</p> <p>15 answered. You can answer again for the,</p> <p>16 probably, 15th time.</p> <p>17 BY THE WITNESS:</p> <p>18 A Yes, the system gives me the next</p> <p>19 available appointment.</p> <p>20 BY MR. MORRISSEY:</p> <p>21 Q In the last three years, do you</p> <p>22 remember any situation where Dr. Qaisi caused</p> <p>23 you to schedule a referred appointment from</p> <p>24 Cermak for the oral surgery department?</p>	<p style="text-align: right;">Page 189</p> <p>1 regards to your job in scheduling inmates who</p> <p>2 have a referral for the oral surgery</p> <p>3 department?</p> <p>4 MS. McELROY: Objection, form,</p> <p>5 foundation, calls for speculation. Answer</p> <p>6 if you know.</p> <p>7 BY THE WITNESS:</p> <p>8 A He types the -- I can't think of the</p> <p>9 word.</p> <p>10 MS. McELROY: Take your time.</p> <p>11 BY THE WITNESS:</p> <p>12 A The comments that Dr. Qaisi makes,</p> <p>13 that's the only thing that I'm looking at</p> <p>14 before I schedule an appointment. After he</p> <p>15 reviews the orders, he types on there:</p> <p>16 Schedule next available appointment.</p> <p>17 BY MR. MORRISSEY:</p> <p>18 Q Where is that on your screen that</p> <p>19 Dr. Qaisi has reviewed the referral from the</p> <p>20 dentist at the Cook County Jail?</p> <p>21 A It's on the order tab.</p> <p>22 Q Pardon?</p> <p>23 A It's on the order tab.</p> <p>24 Q From what period of time -- So each</p>

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<p>1 time -- It's your testimony today that each 2 time you schedule an appointment for a referral 3 from a dentist in Cook County Jail for the oral 4 surgery department, you always look at the 5 order tab?</p> <p>6 MS. McELROY: Objection, form, 7 misconstrues -- misrepresents previous 8 testimony. You can answer.</p> <p>9 BY THE WITNESS:</p> <p>10 A It's on the order tab, those comments 11 that I need from Dr. Qaisi.</p> <p>12 BY MR. MORRISSEY:</p> <p>13 Q So you always -- Before you schedule 14 an inmate's appointment for oral surgery, you 15 always look at the order tab?</p> <p>16 MS. McELROY: Objection, form, 17 mischaracterizes previous testimony. You 18 can answer.</p> <p>19 BY THE WITNESS:</p> <p>20 A Yes.</p> <p>21 BY MR. MORRISSEY:</p> <p>22 Q In the last year, has there ever been 23 a situation where you pulled up the queue which 24 had a referral from a dentist at Cook County</p>	<p>1 BY THE WITNESS:</p> <p>2 A I don't know.</p> <p>3 BY MR. MORRISSEY:</p> <p>4 Q Prior to Dr. Qaisi taking the 5 position of interim chief of oral surgery, do 6 you know if he made entries in the comment 7 sections of each person that was referred by a 8 dentist for oral surgery appointments?</p> <p>9 MS. McELROY: Objection, form, 10 foundation. You can answer.</p> <p>11 BY THE WITNESS:</p> <p>12 A I don't know.</p> <p>13 BY MR. MORRISSEY:</p> <p>14 Q Has Dr. Qaisi, to your knowledge, in 15 the last year ever made a comment for a 16 prisoner that has a referral from the jail on 17 the queue that a person should not be scheduled 18 for the next appointment?</p> <p>19 MS. McELROY: Objection, form, 20 foundation. You can answer.</p> <p>21 BY THE WITNESS:</p> <p>22 A No, never.</p> <p>23 BY MR. MORRISSEY:</p> <p>24 Q In the last three years, has</p>
Page 191	Page 193
<p>1 Jail where you didn't schedule that person for 2 an oral surgery appointment?</p> <p>3 MS. McELROY: Object to form. You 4 can answer.</p> <p>5 BY THE WITNESS:</p> <p>6 A If I didn't schedule it, it's because 7 it didn't have any comments from Dr. Qaisi.</p> <p>8 BY MR. MORRISSEY:</p> <p>9 Q You remember in the last three 10 months -- I'm sorry.</p> <p>11 Do you recall any situation in the 12 last year where you did not schedule an inmate 13 for an oral surgery appointment who was on the 14 queue?</p> <p>15 MS. McELROY: Objection to form. You 16 can answer.</p> <p>17 BY THE WITNESS:</p> <p>18 A I can't recall.</p> <p>19 BY MR. MORRISSEY:</p> <p>20 Q Do you know how long Dr. Qaisi has 21 been the chief -- acting chief of oral surgery?</p> <p>22 MS. McELROY: Objection, foundation. 23 You can answer. 24</p>	<p>1 Dr. Qaisi or any provider in the oral surgery 2 department ever made a comment in the -- 3 comment for an inmate who was in the queue that 4 the person shouldn't be scheduled for the next 5 appointment?</p> <p>6 MS. McELROY: Objection, form and 7 foundation. You can answer.</p> <p>8 BY THE WITNESS:</p> <p>9 A No.</p> <p>10 BY MR. MORRISSEY:</p> <p>11 Q So is it fair to say that everybody 12 that you recall being in the queue from Cermak 13 is always scheduled by you for the next 14 appointment given to you by the computer?</p> <p>15 A If a detainee has an order in Cerner, 16 it will be scheduled by me. If the patient was 17 seen and scheduled by another person, I have no 18 way of knowing without an order.</p> <p>19 Q You schedule for the oral surgery 20 appointments off the queue, correct?</p> <p>21 MS. McELROY: Objection, form, asked 22 and answered I don't know how many times 23 now. 24</p>

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<p style="text-align: right;">Page 194</p> <p>1 BY THE WITNESS:</p> <p>2 A Yes.</p> <p>3 BY MR. MORRISSEY:</p> <p>4 Q And on the queue, you could determine</p> <p>5 whether or not the patient is from Cermak or</p> <p>6 not, correct?</p> <p>7 MS. McELROY: Objection, form, asked</p> <p>8 and answered, I don't know, a million times</p> <p>9 now.</p> <p>10 BY THE WITNESS:</p> <p>11 A Yes.</p> <p>12 BY MR. MORRISSEY:</p> <p>13 Q When you scheduled patients from --</p> <p>14 that are on the queue from Cermak, have you</p> <p>15 ever had a situation where you didn't schedule</p> <p>16 for the next available appointment in the</p> <p>17 computer --</p> <p>18 MS. McELROY: Objection --</p> <p>19 BY MR. MORRISSEY:</p> <p>20 Q -- to your recollection?</p> <p>21 MS. McELROY: -- asked and answered.</p> <p>22 BY THE WITNESS:</p> <p>23 A No.</p> <p>24</p>	<p style="text-align: right;">Page 196</p> <p>1 A It's the same comment, schedule for</p> <p>2 the next available appointment.</p> <p>3 Q And that's the same comment that</p> <p>4 you've seen from Dr. Qaisi for each person that</p> <p>5 appears on the queue from Cermak to be</p> <p>6 scheduled for oral surgery; is that your</p> <p>7 testimony?</p> <p>8 A Yes.</p> <p>9 MS. McELROY: Objection, form.</p> <p>10 BY MR. MORRISSEY:</p> <p>11 Q Now, I'd ask you to turn to</p> <p>12 Exhibit 41. Are you there? I'd like you to</p> <p>13 turn to page -- Looking at what appears to be</p> <p>14 the first page of --</p> <p>15 MS. McELROY: What do you mean "what</p> <p>16 appears to be the first page"? Is it the</p> <p>17 first page or is it not the first page?</p> <p>18 MR. MORRISSEY: Let me go into my</p> <p>19 computer, Ms. McElroy.</p> <p>20 MS. McELROY: Okay. It would be</p> <p>21 great if we could be specific because</p> <p>22 "appears to be" doesn't help much.</p> <p>23 MR. MORRISSEY: It'll take me a</p> <p>24 moment.</p>
<p style="text-align: right;">Page 195</p> <p>1 BY MR. MORRISSEY:</p> <p>2 Q Now, I would ask you to go back for a</p> <p>3 moment to Exhibit 41. Can you pull up</p> <p>4 Exhibit 41 for a moment?</p> <p>5 MS. McELROY: Mr. Morrissey, do you</p> <p>6 need to take your phone call? I see you</p> <p>7 keep picking up the phone. Do you need to</p> <p>8 take your phone call? Is that a yes?</p> <p>9 I just want the record to reflect</p> <p>10 that Mr. Morrissey is currently on the</p> <p>11 phone while we're on the record.</p> <p>12 BY MR. MORRISSEY:</p> <p>13 Q In the comments section for each</p> <p>14 prisoner that you've scheduled for oral surgery</p> <p>15 appointments in the last three years, has</p> <p>16 Dr. Qaisi, to your knowledge, had the same</p> <p>17 comments in regards to scheduling for the next</p> <p>18 appointment?</p> <p>19 MS. McELROY: Objection, form,</p> <p>20 foundation.</p> <p>21 BY THE WITNESS:</p> <p>22 A It's the same comment.</p> <p>23 BY MR. MORRISSEY:</p> <p>24 Q Pardon? Can you repeat it back?</p>	<p style="text-align: right;">Page 197</p> <p>1 BY MR. MORRISSEY:</p> <p>2 Q In Exhibit 41, do you see the name of</p> <p>3 Reggie Daniels?</p> <p>4 A Yes.</p> <p>5 Q Do you? Ma'am, are you on</p> <p>6 Exhibit 41?</p> <p>7 A Yes.</p> <p>8 Q Do you see the page which has</p> <p>9 patients' last names? And if you scroll down</p> <p>10 one, two, three, four, five, six names, do you</p> <p>11 see the name of Reggie Daniels?</p> <p>12 MS. McELROY: Hold on. You said: Do</p> <p>13 you see the page that has patients' last</p> <p>14 names? Well, all the pages have patients'</p> <p>15 last names. So that doesn't make any</p> <p>16 sense.</p> <p>17 So if you want her to go to the</p> <p>18 right place, you have to be specific about</p> <p>19 it because almost all pages have last</p> <p>20 names. So can you clarify what you're</p> <p>21 looking at so we're all on the same page?</p> <p>22 MR. MORRISSEY: Certainly. If you</p> <p>23 give me one moment, Ms. McElroy. I was</p> <p>24 just trying to expedite this.</p>

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<p style="text-align: right;">Page 198</p> <p>1 MS. McELROY: Thanks for trying.</p> <p>2 BY MR. MORRISSEY:</p> <p>3 Q All right. It's Page 2 of</p> <p>4 Exhibit 41. Are you on Page 2 of Exhibit 41?</p> <p>5 A Yes, I see that.</p> <p>6 Q Okay. Do you see the name Reggie</p> <p>7 Daniels?</p> <p>8 A Yes.</p> <p>9 Q Do you see that there was a referral</p> <p>10 request from a dentist, Dr. Khan, on</p> <p>11 January 23rd, 2017?</p> <p>12 A Yes.</p> <p>13 Q In January of 2017, you were the</p> <p>14 person that scheduled oral surgery appointments</p> <p>15 for inmates at the jail?</p> <p>16 MS. McELROY: Objection to form. You</p> <p>17 can answer.</p> <p>18 BY THE WITNESS:</p> <p>19 A Yes.</p> <p>20 BY MR. MORRISSEY:</p> <p>21 Q And then next available -- When you</p> <p>22 scheduled him for an appointment in January of</p> <p>23 2017, the computer gave you the next available</p> <p>24 appointment date of 6/2/2017?</p>	<p style="text-align: right;">Page 200</p> <p>1 BY MR. MORRISSEY:</p> <p>2 Q Ms. Macias, you previously stated, am</p> <p>3 I correct, that from 2017 to the present,</p> <p>4 you're the person in the referral center that</p> <p>5 schedules inmates referred from the jail for</p> <p>6 oral surgery appointments, correct?</p> <p>7 MS. McELROY: I'm going to object</p> <p>8 again to form and foundation. You are</p> <p>9 misrepresenting this record. It does not</p> <p>10 show that she's the one who scheduled this</p> <p>11 detainee. You would have to show her the</p> <p>12 complete scheduling record. You can answer</p> <p>13 if you know.</p> <p>14 BY THE WITNESS:</p> <p>15 A If it was in power order, it had to</p> <p>16 be me; but if it was scheduled in any other</p> <p>17 way, I can't say that it was me.</p> <p>18 BY MR. MORRISSEY:</p> <p>19 Q To your knowledge, for -- To your</p> <p>20 knowledge, if a dentist at the jail makes a</p> <p>21 referral in the power order system, are you the</p> <p>22 one that processes the scheduling for Stroger</p> <p>23 or Stroger's oral surgery?</p> <p>24 A Yes.</p>
<p style="text-align: right;">Page 199</p> <p>1 MS. McELROY: I'm going to object to</p> <p>2 the form, foundation. You haven't</p> <p>3 established that Ms. Macias was the one who</p> <p>4 scheduled this appointment. You haven't</p> <p>5 established that -- You're not showing her</p> <p>6 the complete scheduling history and this</p> <p>7 appointment could have been rescheduled</p> <p>8 multiple times by different people. So you</p> <p>9 are misleading --</p> <p>10 MR. MORRISSEY: So this is a speaking</p> <p>11 objection.</p> <p>12 MS. McELROY: -- the witness by</p> <p>13 showing her this incomplete record.</p> <p>14 MR. MORRISSEY: This is a record that</p> <p>15 you provided the plaintiffs, Ms. McElroy.</p> <p>16 MS. McELROY: And you're</p> <p>17 misrepresenting its content because it is</p> <p>18 not the complete scheduling history report</p> <p>19 for Reggie Daniels, and you haven't</p> <p>20 established Ms. Macias even scheduled this</p> <p>21 appointment.</p> <p>22 MR. MORRISSEY: Well, she stated that</p> <p>23 she --</p> <p>24</p>	<p style="text-align: right;">Page 201</p> <p>1 Q Do you know any other way that a</p> <p>2 dentist at the Cook County Jail can schedule an</p> <p>3 appointment for an oral surgery appointment?</p> <p>4 MS. McELROY: Objection, form,</p> <p>5 foundation. You can answer if you know.</p> <p>6 BY THE WITNESS:</p> <p>7 A I don't know.</p> <p>8 BY MR. MORRISSEY:</p> <p>9 Q Was it your practice -- Assuming this</p> <p>10 was a power order by a dentist at the Cook</p> <p>11 County Jail for Mr. Daniels, was it your</p> <p>12 practice to schedule him for an appointment in</p> <p>13 oral surgery on the date the computer provides</p> <p>14 you, the most -- the earliest appointment date?</p> <p>15 MS. McELROY: I'm going to object to</p> <p>16 form and foundation and also that it hadn't</p> <p>17 been established that this appointment date</p> <p>18 was the next available date for Mr. Reggie</p> <p>19 Daniels. We don't have the complete</p> <p>20 scheduling history. We don't know what</p> <p>21 happened. You're misrepresenting the</p> <p>22 record again. You can answer.</p> <p>23 BY MR. MORRISSEY:</p> <p>24 Q Do you understand the question?</p>

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Page 202	Page 204
<p>1 A I don't know if the patient was 2 rescheduled. I'm not looking at Cerner so I 3 can't say that the patient got the next 4 available appointment. 5 Q Well, the top of this says: Referral 6 request. That would be a referral request in 7 Cerner, correct? 8 MS. McELROY: Objection to form, 9 foundation. And again, you are 10 misrepresenting this document. You can 11 answer if, you know. 12 BY THE WITNESS: 13 A The patient could have been 14 rescheduled. I can't say because I'm not 15 looking at Cerner. 16 BY MR. MORRISSEY: 17 Q But there is a -- If we look above 18 that, there is a Ms. Bradley. Do you see that? 19 And there was a referral request on 20 January 20th, 2017 and then there was an 21 appointment for Ms. Bradley on 6/2/2017. 22 Based upon your experience as the 23 scheduler for inmates seeking appointments in 24 the oral surgery department, is that consistent</p>	<p>1 saying the document that you tendered in 2 this case is untrue. 3 MS. McELROY: Mr. Morrissey, what I'm 4 saying is that this is just a snapshot of 5 the true picture of what is going on here. 6 You are showing Ms. Macias a very small 7 portion of information and asking her to 8 make inferences without having a complete 9 record. 10 You know from your experience in 11 this case and many others that the full 12 scheduling history is required in addition 13 to a detainee's medical record to make a 14 determination of when somebody was 15 scheduled. There are many things that can 16 impact the original referral requested 17 date, not just the scheduling and no-shows 18 and a myriad of other things. So you are 19 misrepresenting what this document is. 20 MR. MORRISSEY: I am not. You 21 tendered this document. 22 MS. McELROY: You are. 23 MR. MORRISSEY: Ms. McElroy, are you 24 going to let me ask the question?</p>
Page 203	Page 205
<p>1 with the time, the wait time, that a person 2 would have had to wait in January of 2017 for 3 an appointment in the oral surgery department? 4 MS. McELROY: I'm going to object on 5 form, foundation, compound question. 6 Again, you're misconstruing this record. 7 MR. MORRISSEY: Ms. McElroy -- 8 MS. McELROY: Can you wait -- 9 (Talking over each other.) 10 MR. MORRISSEY: Ms. McElroy, this 11 document -- 12 MS. McELROY: No, I'm going to finish 13 my objection. 14 MR. MORRISSEY: Yeah, Ms. McElroy, 15 though, you tendered this document. You 16 purported -- You represented that this 17 document represented the folks that were 18 scheduled for their initial appointment at 19 the oral surgery department after a 20 referral by the -- by a dentist at Cook 21 County Jail. 22 So now you're telling -- Now 23 you're putting on the record -- You're 24 trying to obstruct this deposition by</p>	<p>1 MS. McELROY: If you are -- 2 BY MR. MORRISSEY: 3 Q To the best of your knowledge -- 4 MS. McELROY: -- misrepresenting this 5 document, then yeah. 6 MR. MORRISSEY: Well, it's a document 7 that came from the defendants. This isn't 8 the complete information? If this isn't 9 the complete information, Ms. McElroy, I 10 would ask you to provide that information 11 to the plaintiffs. 12 MS. McELROY: Mr. Morrissey -- 13 MR. MORRISSEY: I mean, if you're 14 withholding -- 15 MS. McELROY: -- we have a million -- 16 MR. MORRISSEY: If you're 17 withholding -- If you're withholding -- 18 Ms. McElroy, if you'll allow me to state 19 what I'm saying. 20 If you're withholding the 21 scheduling records for putative class 22 members, I would wish that you would 23 forward it immediately to my office. 24 MS. McELROY: Mr. Morrissey, there</p>

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53 (Pages 206 to 209)

<p style="text-align: right;">Page 206</p> <p>1 has been thousands upon thousands of pages.</p> <p>2 Perhaps if you wanted to use that, you</p> <p>3 should have pored through it and used it as</p> <p>4 an exhibit here today.</p> <p>5 BY MR. MORRISSEY:</p> <p>6 Q Ma'am, can you tell me in January of</p> <p>7 2017 for a gentleman like Mr. Daniels who had a</p> <p>8 referral on January 23rd, 2017, was it</p> <p>9 consistent with your understanding that the</p> <p>10 next available appointment would have been in</p> <p>11 June of 2017?</p> <p>12 MS. McELROY: I'm going to object to</p> <p>13 form, foundation, misrepresenting this</p> <p>14 record, misconstruing the evidence in this</p> <p>15 case. Ms. Macias, you can answer if you</p> <p>16 know.</p> <p>17 BY THE WITNESS:</p> <p>18 A I don't know. The patient could have</p> <p>19 been rescheduled. I don't know.</p> <p>20 BY MR. MORRISSEY:</p> <p>21 Q What would refresh your memory?</p> <p>22 A If I looked in the Cerner system.</p> <p>23 Q If we look at Dominique Greer on</p> <p>24 Page 2, Exhibit Number 41, there is a</p>	<p style="text-align: right;">Page 208</p> <p>1 (WHEREUPON, a short break</p> <p>2 was taken.)</p> <p>3 MR. MORRISSEY: Peggy, can you read</p> <p>4 back the last question?</p> <p>5 (WHEREUPON, the record was</p> <p>6 read as requested.)</p> <p>7 BY MR. MORRISSEY:</p> <p>8 Q Let's go to the next one that's</p> <p>9 directly above Ms. Greer, Kristen Kruger. Do</p> <p>10 you see that entry?</p> <p>11 A I see it.</p> <p>12 Q And do you see that Dr. Khan referred</p> <p>13 Kristen Kruger to oral surgery?</p> <p>14 MS. McELROY: Objection, form,</p> <p>15 foundation.</p> <p>16 BY THE WITNESS:</p> <p>17 A Yes.</p> <p>18 BY MR. MORRISSEY:</p> <p>19 Q And do you see the referral was made</p> <p>20 on February 9th, 2017?</p> <p>21 MS. McELROY: Objection to form and</p> <p>22 foundation.</p> <p>23 BY THE WITNESS:</p> <p>24 A Yes.</p>
<p style="text-align: right;">Page 207</p> <p>1 referral -- Do you see a referral by Dr. Khan?</p> <p>2 A What's the last name?</p> <p>3 Q The last name is Greer.</p> <p>4 A Okay. What's the first name?</p> <p>5 Q Dominique.</p> <p>6 A Okay. I see it.</p> <p>7 Q And on 2/16 was there a referral --</p> <p>8 Was there a referral request on 2/16/2017 for</p> <p>9 an oral surgery appointment for Ms. Greer?</p> <p>10 MS. McELROY: Objection, form,</p> <p>11 foundation. You can answer.</p> <p>12 BY THE WITNESS:</p> <p>13 A I don't know. The patient could have</p> <p>14 been rescheduled.</p> <p>15 BY MR. MORRISSEY:</p> <p>16 Q And does it say on the top --</p> <p>17 MS. McELROY: I'm getting a call from</p> <p>18 my office. I wasn't expecting to be here</p> <p>19 until quarter to 5:00. I have to take</p> <p>20 this.</p> <p>21 MR. MORRISSEY: Well, I guess we'll</p> <p>22 go off the record for a few moments.</p> <p>23 MS. McELROY: Yeah, I need to take</p> <p>24 this phone call.</p>	<p style="text-align: right;">Page 209</p> <p>1 BY MR. MORRISSEY:</p> <p>2 Q And the appointment date on this</p> <p>3 document that was tendered by defense counsel</p> <p>4 shows that the next appointment was 6/27/2017.</p> <p>5 Do you see that?</p> <p>6 MS. McELROY: Objection, form,</p> <p>7 foundation, misconstruing the record for</p> <p>8 the, probably, 30th time or more. You can</p> <p>9 answer, Ms. Macias.</p> <p>10 BY THE WITNESS:</p> <p>11 A I see that.</p> <p>12 BY MR. MORRISSEY:</p> <p>13 Q Now, let's go to the one above that,</p> <p>14 Michael Jackson. Do you see how he had a</p> <p>15 referral on 2/8/2017?</p> <p>16 MS. McELROY: Objection to form and</p> <p>17 foundation. You can answer if you know.</p> <p>18 BY THE WITNESS:</p> <p>19 A Yes.</p> <p>20 BY MR. MORRISSEY:</p> <p>21 Q And the appointment date that was</p> <p>22 given for that referral from Dr. Khan was</p> <p>23 6/26/2017, correct?</p> <p>24 MS. McELROY: Objection, form,</p>

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54 (Pages 210 to 213)

Page 210	Page 212
<p>1 foundation, misrepresents the exhibit and 2 record. Answer if you know, Ms. Macias. 3 BY THE WITNESS: 4 A Yes. The patient -- 5 BY MR. MORRISSEY: 6 Q And if we go to the one -- 7 MS. McELROY: She's still giving her 8 answer. If you would let her finish, I 9 would appreciate it. 10 MR. MORRISSEY: It would be nice if 11 you kept the tone of your voice down, 12 Ms. McElroy. 13 MS. McELROY: Well, I wanted to make 14 sure that you heard me. I'm speaking 15 normally. 16 MR. MORRISSEY: I can hear you quite 17 well. There's nothing wrong with my 18 hearing. 19 MS. McELROY: Good. I'm glad you can 20 hear me. Now listen to the witness, 21 please. 22 BY THE WITNESS: 23 A Yes, I see the date that he was 24 scheduled for. The patient could have been</p>	<p>1 MS. McELROY: Objection, form and 2 foundation. 3 BY THE WITNESS: 4 A June 26 of 2017. 5 BY MR. MORRISSEY: 6 Q And then we have directly above that, 7 there's a Jessie Pinkerton, correct? 8 A Correct. 9 Q And he had a referral date by 10 Dr. Khan on January 25th, 2017? 11 MS. McELROY: Objection, form, 12 foundation. You can answer. 13 BY THE WITNESS: 14 A Yes, I see that. 15 BY MR. MORRISSEY: 16 Q And Jessie Pinkerton was given an 17 appointment for June 13th, 2017 in the oral 18 surgery clinic. Do you see that? 19 MS. McELROY: Objection, form, 20 foundation, misrepresents the record. You 21 can answer if you know, Ms. Macias. 22 BY THE WITNESS: 23 A Yes, I see that. The patient could 24 have been rescheduled.</p>
Page 211	Page 213
<p>1 rescheduled. 2 BY MR. MORRISSEY: 3 Q Okay. And we have right above that a 4 Rodney Pierce. Do you see that? 5 A Yes, I see that. 6 Q And he was referred by Dr. Khan, 7 correct? 8 MS. McELROY: Object to form and 9 foundation. 10 BY THE WITNESS: 11 A Correct. 12 BY MR. MORRISSEY: 13 Q And the referral date was 14 February 8th, 2017? 15 MS. McELROY: Objection to form and 16 foundation, misconstruing this record 17 again. You can answer if you know again, 18 Ms. Macias. 19 BY THE WITNESS: 20 A Yes, I see the date. 21 BY MR. MORRISSEY: 22 Q And do you see the appointment date? 23 A I see that. 24 Q What is the appointment date?</p>	<p>1 BY MR. MORRISSEY: 2 Q Do you reschedule patients for 3 Stroger oral surgery clinic from the Cook 4 County Jail? 5 MS. McELROY: Objection, form, 6 foundation. You can answer. 7 BY THE WITNESS: 8 A No. 9 BY MR. MORRISSEY: 10 Q Do you have any knowledge how 11 patients from the Cook County Jail are 12 rescheduled for appointments? 13 A No. 14 Q Do you have any knowledge whether or 15 not patients that have a referral from a 16 dentist at the Cook County Jail are rescheduled 17 for appointments in the oral surgery 18 department? 19 A Did you say rescheduled? 20 Q Yes. 21 MS. McELROY: Did you hear his entire 22 question? 23 THE WITNESS: No. 24</p>

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55 (Pages 214 to 217)

<p style="text-align: right;">Page 214</p> <p>1 BY THE WITNESS:</p> <p>2 A I'm sorry. Can you repeat it?</p> <p>3 MR. MORRISSEY: Peggy, can you repeat</p> <p>4 the question?</p> <p>5 (WHEREUPON, the record was</p> <p>6 read as requested.)</p> <p>7 BY THE WITNESS:</p> <p>8 A No, I don't.</p> <p>9 BY MR. MORRISSEY:</p> <p>10 Q In the referral section for Stroger,</p> <p>11 do you know if there is any clerk that</p> <p>12 schedules inmates that are referred by a</p> <p>13 dentist at the Cook County Jail for a follow-up</p> <p>14 appointment?</p> <p>15 MS. McELROY: Objection, form,</p> <p>16 foundation.</p> <p>17 BY THE WITNESS:</p> <p>18 A I don't know that.</p> <p>19 BY MR. MORRISSEY:</p> <p>20 Q Do you have any knowledge of any</p> <p>21 clerk or nurse in a referral section who</p> <p>22 schedule inmates referred by a dentist at the</p> <p>23 Cook County Jail for an appointment in the oral</p> <p>24 surgery clinic?</p>	<p style="text-align: right;">Page 216</p> <p>1 BY MR. MORRISSEY:</p> <p>2 Q My question is: Do you know?</p> <p>3 A No.</p> <p>4 Q We looked at referral orders by</p> <p>5 Dr. Khan for Pinkerton, Pierce, Jackson, Kruger</p> <p>6 and Greer, and they all were given appointments</p> <p>7 more than three months out according to Exhibit</p> <p>8 Number 41, correct?</p> <p>9 MS. McELROY: Mr. Morrissey, you're</p> <p>10 breaking up. That was very choppy. That</p> <p>11 was not --</p> <p>12 MR. MORRISSEY: Did you hear the --</p> <p>13 Peggy, can you repeat the question?</p> <p>14 (WHEREUPON, the record was</p> <p>15 read as requested.)</p> <p>16 MS. McELROY: Objection, form. You</p> <p>17 can answer.</p> <p>18 BY THE WITNESS:</p> <p>19 A It varies, the date varies. It could</p> <p>20 be 1 to 12 weeks.</p> <p>21 BY MR. MORRISSEY:</p> <p>22 Q Well, looking at the records for</p> <p>23 those inmates, were any of them scheduled</p> <p>24 within one week of the referral?</p>
<p style="text-align: right;">Page 215</p> <p>1 MS. McELROY: Objection, form.</p> <p>2 BY THE WITNESS:</p> <p>3 A Is that for new or follow-up?</p> <p>4 BY MR. MORRISSEY:</p> <p>5 Q No. That's a new question.</p> <p>6 MS. McELROY: No, she's -- She asked</p> <p>7 you is that for new or follow-up.</p> <p>8 BY MR. MORRISSEY:</p> <p>9 Q That's for you. The question is: Do</p> <p>10 you know of anybody, any employee in your</p> <p>11 section at Stroger that schedules missed</p> <p>12 appointments for inmates in the oral surgery</p> <p>13 clinic?</p> <p>14 MS. McELROY: Objection, form,</p> <p>15 foundation.</p> <p>16 BY THE WITNESS:</p> <p>17 A No.</p> <p>18 BY MR. MORRISSEY:</p> <p>19 Q Do you have any knowledge if anybody</p> <p>20 at Stroger makes follow-up appointments for</p> <p>21 inmates to be seen in the oral surgery clinic?</p> <p>22 MS. McELROY: Form, foundation.</p> <p>23 BY THE WITNESS:</p> <p>24 A It's not my department.</p>	<p style="text-align: right;">Page 217</p> <p>1 MS. McELROY: Objection, form.</p> <p>2 BY THE WITNESS:</p> <p>3 A Not the ones that I'm looking at. It</p> <p>4 has happened though.</p> <p>5 BY MR. MORRISSEY:</p> <p>6 Q In February of 2017, looking at this</p> <p>7 record, were any of the inmates that were</p> <p>8 referred by Dr. Khan to oral surgery scheduled</p> <p>9 within one week?</p> <p>10 MS. McELROY: Objection, form, calls</p> <p>11 for speculation. Ms. Macias, take your</p> <p>12 time. He's asking you to look for an</p> <p>13 entire month.</p> <p>14 And I just also want to say that</p> <p>15 you are misrepresenting this record again.</p> <p>16 BY THE WITNESS:</p> <p>17 A Okay. I don't see any for one week</p> <p>18 but I see three weeks.</p> <p>19 BY MR. MORRISSEY:</p> <p>20 Q I'll ask you that. Between</p> <p>21 February 8th, 2017 and February 24th, 2017 for</p> <p>22 referrals, were any of them scheduled within</p> <p>23 ten weeks?</p> <p>24 MS. McELROY: We can't hear you,</p>

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<p style="text-align: right;">Page 218</p> <p>1 Mr. Morrissey. What is the question?</p> <p>2 MR. MORRISSEY: Peggy, did you hear</p> <p>3 it?</p> <p>4 THE REPORTER: Yes.</p> <p>5 MR. MORRISSEY: You can repeat the</p> <p>6 question.</p> <p>7 (WHEREUPON, the record was</p> <p>8 read as requested.)</p> <p>9 MS. McELROY: Objection to form,</p> <p>10 foundation, mischaracterizes this record as</p> <p>11 far as it is not the complete scheduling</p> <p>12 history.</p> <p>13 Ms. Macias, you can answer after</p> <p>14 you take your time and look through what</p> <p>15 Mr. Morrissey has asked you to look through</p> <p>16 and if you understood his question.</p> <p>17 BY THE WITNESS:</p> <p>18 A I'm sorry. Can you repeat it?</p> <p>19 (WHEREUPON, the record was</p> <p>20 read as requested.)</p> <p>21 BY THE WITNESS:</p> <p>22 A Within ten weeks.</p> <p>23 MS. McELROY: Same objection. Take</p> <p>24 your time to look at it.</p>	<p style="text-align: right;">Page 220</p> <p>1 foundation. This is not a complete</p> <p>2 scheduling history for any of these</p> <p>3 detainees. Calls for speculation. You can</p> <p>4 answer if you can, Ms. Macias.</p> <p>5 BY THE WITNESS:</p> <p>6 A According to that record, I don't see</p> <p>7 any scheduled for the month of April.</p> <p>8 BY MR. MORRISSEY:</p> <p>9 Q How about May of 2017 for people that</p> <p>10 were referred by Dr. Khan in February of 2017?</p> <p>11 Do you see any of the individuals that were</p> <p>12 referred between 2/8/2017 and 2/24/2017 that</p> <p>13 were seen in May 2017?</p> <p>14 MS. McELROY: Form, foundation,</p> <p>15 misconstruing/misrepresenting this record</p> <p>16 again.</p> <p>17 And at this point, these</p> <p>18 questions are harassing. This record,</p> <p>19 incomplete as it may be or not incomplete</p> <p>20 as it may be, but it's not the full</p> <p>21 scheduling history and it's not a picture</p> <p>22 of what occurred with each one of these</p> <p>23 detainees. You can answer.</p> <p>24</p>
<p style="text-align: right;">Page 219</p> <p>1 BY THE WITNESS:</p> <p>2 A I would need a calendar. I can't...</p> <p>3 MS. McELROY: She answered your</p> <p>4 question. Do you have another question?</p> <p>5 She said she would need a calendar. She</p> <p>6 can't answer the question.</p> <p>7 BY MR. MORRISSEY:</p> <p>8 Q Looking at the period from</p> <p>9 February 8th, 2017 to February 24th, 2017,</p> <p>10 there is eight referrals by Dr. Khan to oral</p> <p>11 surgery. Were any of them scheduled in March</p> <p>12 of 2017?</p> <p>13 MS. McELROY: Objection to form,</p> <p>14 foundation, mischaracterizes this record as</p> <p>15 it is not a complete scheduling history for</p> <p>16 any of these detainees. Ms. Macias, answer</p> <p>17 if you can.</p> <p>18 BY THE WITNESS:</p> <p>19 A I don't see any scheduled for the</p> <p>20 month of March.</p> <p>21 BY MR. MORRISSEY:</p> <p>22 Q Of those eight inmates, were any of</p> <p>23 them scheduled in April?</p> <p>24 MS. McELROY: Object to form,</p>	<p style="text-align: right;">Page 221</p> <p>1 BY THE WITNESS:</p> <p>2 A I don't see any scheduled for the</p> <p>3 month of May.</p> <p>4 BY MR. MORRISSEY:</p> <p>5 Q Now, if we go down even more, there</p> <p>6 is a Mr. Whitehead. Do you see that?</p> <p>7 A Yes.</p> <p>8 Q And he had a referral from Dr. Khan</p> <p>9 on February 27, 2017, correct?</p> <p>10 A That looks like three weeks.</p> <p>11 Q Well, a little bit more than three</p> <p>12 weeks. On 3/20/2017, correct?</p> <p>13 A 2/27 to 3/20, that's --</p> <p>14 Q Now, if we go down further to the</p> <p>15 month of --</p> <p>16 MS. McELROY: She was still answering</p> <p>17 your question. You keep cutting her off.</p> <p>18 MR. MORRISSEY: Thank you,</p> <p>19 Ms. McElroy.</p> <p>20 MS. McELROY: Well, let my client</p> <p>21 finish her answer. Please do not cut her</p> <p>22 off.</p> <p>23 MR. MORRISSEY: I think she was</p> <p>24 completed.</p>

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Page 222	Page 224
<p>1 MS. McELROY: She was not, that's</p> <p>2 why --</p> <p>3 MR. MORRISSEY: All right. Well --</p> <p>4 MS. McELROY: She wasn't finished</p> <p>5 with her answer.</p> <p>6 BY MR. MORRISSEY:</p> <p>7 Q All right. Go ahead.</p> <p>8 A I said that it looks to me that it</p> <p>9 was three weeks. 2/27/2017 to March 20th of</p> <p>10 2017, isn't that --</p> <p>11 Q Now, if we go -- Have you completed?</p> <p>12 A Yes.</p> <p>13 Q Now, if we go right below</p> <p>14 Mr. Whitehead, there's Mr. Robles, correct,</p> <p>15 Mr. Robinson, Mr. Watson, Mr. Suddoth, and</p> <p>16 Mr. Martinez, all who had referrals from</p> <p>17 Dr. Khan in February of 2017, correct?</p> <p>18 MS. McELROY: Objection, form,</p> <p>19 foundation, misrepresents this record.</p> <p>20 Answer, if you know.</p> <p>21 BY THE WITNESS:</p> <p>22 A I see them.</p> <p>23 BY MR. MORRISSEY:</p> <p>24 Q And all of them for their first</p>	<p>1 MS. McELROY: Objection, form,</p> <p>2 foundation. You can answer.</p> <p>3 BY THE WITNESS:</p> <p>4 A I don't know.</p> <p>5 BY MR. MORRISSEY:</p> <p>6 Q Now, if we continue this exercise and</p> <p>7 we go to the month of March of 2017 for</p> <p>8 referrals from Dr. Khan, on Page 2.</p> <p>9 A Okay.</p> <p>10 Q On Page 2 of Group Exhibit</p> <p>11 Number 14 [sic], there's 11 referrals made by</p> <p>12 Dr. Khan to oral surgery in March of 2017. Do</p> <p>13 you see that?</p> <p>14 MS. McELROY: Objection, form. It's</p> <p>15 a very confusing question. Can you repeat</p> <p>16 that?</p> <p>17 (WHEREUPON, the record was</p> <p>18 read as requested.)</p> <p>19 MS. McELROY: So we're now in</p> <p>20 Exhibit 14?</p> <p>21 MR. MORRISSEY: We're now on</p> <p>22 Exhibit 41. We're on Exhibit 41, Page 2.</p> <p>23 BY MR. MORRISSEY:</p> <p>24 Q The referrals by Dr. Khan in March of</p>
Page 223	Page 225
<p>1 appointment was in July of 2017; isn't that</p> <p>2 correct?</p> <p>3 MS. McELROY: Objection, form,</p> <p>4 foundation, misconstrues this record as it</p> <p>5 is not a complete scheduling history. You</p> <p>6 can answer.</p> <p>7 BY THE WITNESS:</p> <p>8 A I'm not looking at the whole record,</p> <p>9 so I don't know if they were rescheduled.</p> <p>10 BY MR. MORRISSEY:</p> <p>11 Q Well, you have no personal knowledge</p> <p>12 of anybody being rescheduled to the Cook County</p> <p>13 Jail; isn't that true?</p> <p>14 MS. McELROY: Objection, form,</p> <p>15 foundation, harassing, asked and answered.</p> <p>16 You can answer again.</p> <p>17 BY THE WITNESS:</p> <p>18 A It could have been rescheduled but</p> <p>19 not by me, by another person.</p> <p>20 BY MR. MORRISSEY:</p> <p>21 Q You don't know if there is a process</p> <p>22 where an inmate at the jail can be rescheduled</p> <p>23 for an oral surgery appointment; is that fair</p> <p>24 to say?</p>	<p>1 2017, there were 11 referrals to you in March</p> <p>2 of -- March of 2017 in the power orders,</p> <p>3 correct?</p> <p>4 MS. McELROY: Objection, form,</p> <p>5 foundation, mischaracterizes this record as</p> <p>6 it is not a full scheduling history for</p> <p>7 these detainees. You can answer.</p> <p>8 BY THE WITNESS:</p> <p>9 A I see the 11 referrals.</p> <p>10 BY MR. MORRISSEY:</p> <p>11 Q Were any of the referrals made by</p> <p>12 Dr. Khan in March of 2017 scheduled for</p> <p>13 appointments in April of 2017?</p> <p>14 A Not according to that, no.</p> <p>15 Q In May of 2017, were there any</p> <p>16 referrals that were made by Dr. Khan in March</p> <p>17 of 2017 seen in May of 2017?</p> <p>18 MS. McELROY: Objection, form,</p> <p>19 misrepresents this record again and to the</p> <p>20 extent that these questions over and over</p> <p>21 again are harassing. You can answer,</p> <p>22 Ms. Macias.</p> <p>23 BY THE WITNESS:</p> <p>24 A No, not according to this record.</p>

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<p style="text-align: right;">Page 226</p> <p>1 BY MR. MORRISSEY:</p> <p>2 Q According to this record, were there</p> <p>3 any appointments made for inmates that were</p> <p>4 referred by Dr. Khan in February of -- I'm</p> <p>5 sorry, in March of 2017, did they have</p> <p>6 appointments in June of 2017?</p> <p>7 MS. McELROY: Same objections.</p> <p>8 BY THE WITNESS:</p> <p>9 A No. According to this record.</p> <p>10 BY MR. MORRISSEY:</p> <p>11 Q Are the 11 records of referrals in</p> <p>12 March of 2017, the timing of their appointments</p> <p>13 in July of 2017, consistent with your prior</p> <p>14 deposition statement that it -- that an</p> <p>15 appointment can be booked out ten weeks in</p> <p>16 advance?</p> <p>17 MS. McELROY: Objection, form. Also</p> <p>18 speculation, misconstrues previous</p> <p>19 testimony.</p> <p>20 MR. MORRISSEY: Let me rephrase the</p> <p>21 question.</p> <p>22 BY MR. MORRISSEY:</p> <p>23 Q You've testified previously in the</p> <p>24 Ammons deposition that when you schedule a</p>	<p style="text-align: right;">Page 228</p> <p>1 BY MR. MORRISSEY:</p> <p>2 Q Can it be longer than 12 weeks when</p> <p>3 you receive a referral from a dentist at Cook</p> <p>4 County Jail for you to be able to schedule an</p> <p>5 appointment in the oral surgery department?</p> <p>6 MS. McELROY: Objection, form, calls</p> <p>7 for speculation. You can answer.</p> <p>8 BY THE WITNESS:</p> <p>9 A I don't remember if it's been over</p> <p>10 12 weeks. I don't remember.</p> <p>11 BY MR. MORRISSEY:</p> <p>12 Q In January and February and March of</p> <p>13 2017, looking at Page 2 of Exhibit 41, what is</p> <p>14 the earliest time a person was scheduled for an</p> <p>15 appointment in the oral surgery clinic by you</p> <p>16 after receiving a referral from Dr. Khan?</p> <p>17 MS. McELROY: I'm sorry,</p> <p>18 Mr. Morrissey. Are you asking her to look</p> <p>19 at this entire record in --</p> <p>20 MR. MORRISSEY: I'm asking her to</p> <p>21 look at Page 2 of 41.</p> <p>22 MS. McELROY: You want her to</p> <p>23 scrutinize the entire page for what was the</p> <p>24 soonest appointment?</p>
<p style="text-align: right;">Page 227</p> <p>1 person who's been referred by a dentist at the</p> <p>2 jail, it can take -- the next appointment can</p> <p>3 be ten weeks out; is that fair to say?</p> <p>4 MS. McELROY: Objection, misconstrues</p> <p>5 previous testimony, form. You can answer.</p> <p>6 MR. MORRISSEY: Was there an answer,</p> <p>7 Peggy?</p> <p>8 THE REPORTER: Not yet.</p> <p>9 BY THE WITNESS:</p> <p>10 A It looks like the patients were</p> <p>11 scheduled 10 to 12 weeks away from -- according</p> <p>12 to that record.</p> <p>13 BY MR. MORRISSEY:</p> <p>14 Q And is that consistent to your</p> <p>15 understanding as the scheduler for inmates with</p> <p>16 referrals to oral surgery that when you</p> <p>17 schedule them, you might have to schedule them</p> <p>18 10 to 12 weeks out for an appointment?</p> <p>19 MS. McELROY: Objection, form,</p> <p>20 foundation, calls for speculation.</p> <p>21 BY THE WITNESS:</p> <p>22 A They could be scheduled from 1 to</p> <p>23 12 weeks from then.</p> <p>24</p>	<p style="text-align: right;">Page 229</p> <p>1 MR. MORRISSEY: That's the question.</p> <p>2 BY THE WITNESS:</p> <p>3 A For referrals that were entered in</p> <p>4 March of 2017, it looks like it was from 10 to</p> <p>5 12 weeks according to this record.</p> <p>6 BY MR. MORRISSEY:</p> <p>7 Q My question: In looking at Page 2 of</p> <p>8 Exhibit 41 for the inmates that had referrals</p> <p>9 from Dr. Khan, what was the least amount of</p> <p>10 time an inmate had to wait for an appointment</p> <p>11 to be scheduled after receiving a referral to</p> <p>12 the oral surgery clinic?</p> <p>13 MS. McELROY: Objection to form and</p> <p>14 foundation. And again, this is misleading.</p> <p>15 This record is not the complete scheduling</p> <p>16 record for any of these detainees, and what</p> <p>17 you're asking for is calling for</p> <p>18 speculation. You can answer if you know,</p> <p>19 Ms. Macias.</p> <p>20 BY THE WITNESS:</p> <p>21 A According to this record, it looks</p> <p>22 like ten weeks.</p> <p>23 BY MR. MORRISSEY:</p> <p>24 Q Now, if we turn to Page 3 of Group</p>

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<p style="text-align: right;">Page 230</p> <p>1 Exhibit Number -- Group Exhibit Number 41, if</p> <p>2 we look at the month of May, 2017 in regards to</p> <p>3 referrals by Dr. Khan, there appear to be six</p> <p>4 people that were referred by Dr. Khan in May of</p> <p>5 2017. Do you see that on Page 3 of Exhibit 41?</p> <p>6 A Yes, I see that.</p> <p>7 Q And the individuals that were</p> <p>8 referred in May of 2017 by Dr. Khan, the</p> <p>9 earliest appointment they received was in</p> <p>10 September of 2017? Do you see that?</p> <p>11 MS. McELROY: Objection to form,</p> <p>12 foundation. And again, I don't know how</p> <p>13 many times I have to say this, that this</p> <p>14 referral spreadsheet is not a complete</p> <p>15 scheduling history for any of these</p> <p>16 detainees and it shows but a snapshot of</p> <p>17 the full scheduling history of what</p> <p>18 occurred with any one appointment. You can</p> <p>19 answer.</p> <p>20 BY THE WITNESS:</p> <p>21 A It looks like they were scheduled,</p> <p>22 according to this record, about ten weeks.</p> <p>23 BY MR. MORRISSEY:</p> <p>24 Q Well, nobody was scheduled in June,</p>	<p style="text-align: right;">Page 232</p> <p>1 BY MR. MORRISSEY:</p> <p>2 Q Was anybody scheduled that was</p> <p>3 referred in May of 2017 for the month of July?</p> <p>4 MS. McELROY: I'm going to object to</p> <p>5 form, foundation. Again, it misconstrues</p> <p>6 this record as it is not a complete</p> <p>7 scheduling history for any of the</p> <p>8 detainees, and a full scheduling history is</p> <p>9 not reflected on this spreadsheet.</p> <p>10 You can answer if you know,</p> <p>11 Ms. Macias.</p> <p>12 BY THE WITNESS:</p> <p>13 A According to this record, I don't see</p> <p>14 anyone scheduled for the month of July.</p> <p>15 BY MR. MORRISSEY:</p> <p>16 Q In regards to the people that were</p> <p>17 referred by Dr. Khan in May of 2017, was</p> <p>18 anybody scheduled in August 2017 for an oral</p> <p>19 surgery appointment?</p> <p>20 MS. McELROY: I'm going to object to</p> <p>21 form, foundation, the fact that you're</p> <p>22 misconstruing this record a million times</p> <p>23 and that it is not a clear and complete</p> <p>24 scheduling history for each respective</p>
<p style="text-align: right;">Page 231</p> <p>1 correct, if they had a referral in May?</p> <p>2 MS. McELROY: Objection, form,</p> <p>3 foundation.</p> <p>4 BY MR. MORRISSEY:</p> <p>5 Q According to this record that was --</p> <p>6 All right. According to this record that was</p> <p>7 tendered by the State's Attorney or the</p> <p>8 attorneys for Cook County, for people that were</p> <p>9 referred by Dr. Khan in May of 2017, nobody</p> <p>10 received an appointment in May, correct?</p> <p>11 MS. McELROY: Objection, form,</p> <p>12 foundation, misconstruing this record yet</p> <p>13 again because it is not a complete</p> <p>14 scheduling history.</p> <p>15 You can answer if you know,</p> <p>16 Ms. Macias.</p> <p>17 BY THE WITNESS:</p> <p>18 A Correct.</p> <p>19 MR. MORRISSEY: Was there a response,</p> <p>20 Peggy?</p> <p>21 BY THE WITNESS:</p> <p>22 A I don't see anyone scheduled for the</p> <p>23 month of June according to this record.</p> <p>24</p>	<p style="text-align: right;">Page 233</p> <p>1 detainee. You can answer if you know.</p> <p>2 BY THE WITNESS:</p> <p>3 A I don't see anyone scheduled for the</p> <p>4 month of August.</p> <p>5 MS. McELROY: I just want to reflect</p> <p>6 that Mr. Morrissey is taking telephone</p> <p>7 calls while the deposition is going.</p> <p>8 Glad you can rejoin us,</p> <p>9 Mr. Morrissey.</p> <p>10 BY MR. MORRISSEY:</p> <p>11 Q In regards to the individuals that</p> <p>12 we've looked at that had referrals in May of</p> <p>13 2017 -- it looks like there's six inmates that</p> <p>14 had referrals -- is the scheduling by you of</p> <p>15 their appointments more than three months out,</p> <p>16 is that consistent with your understanding that</p> <p>17 it can take at least ten weeks after you</p> <p>18 receive a referral from a dentist at the jail</p> <p>19 for you to be able to schedule an appointment</p> <p>20 in the oral surgery department?</p> <p>21 MS. McELROY: Objection, form,</p> <p>22 foundation, calls for speculation, again</p> <p>23 misconstruing the record as it is not a</p> <p>24 full scheduling history for any detainee.</p>


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<p>1 You can answer if you know,</p> <p>2 Ms. Macias.</p> <p>3 BY THE WITNESS:</p> <p>4 A According to this record, it looks</p> <p>5 like they were scheduled 10 to 12 weeks.</p> <p>6 MS. McELROY: I need a moment. The</p> <p>7 time is now 5:30. And I would ask that the</p> <p>8 court reporter give us a count of what's</p> <p>9 left because none of us anticipated being</p> <p>10 here until 5:30 p.m.</p> <p>11 I need to make arrangements for</p> <p>12 the evening for my personal life, so if you</p> <p>13 could give us a count, I would appreciate</p> <p>14 it.</p> <p>15 THE REPORTER: Just give me one</p> <p>16 minute. Okay?</p> <p>17 MS. McELROY: We're going to run to</p> <p>18 the bathroom.</p> <p>19 THE REPORTER: We're at five hours</p> <p>20 and ten minutes.</p> <p>21 MS. McELROY: I'm sorry?</p> <p>22 THE REPORTER: Five hours and ten</p> <p>23 minutes.</p> <p>24</p>	<p>1 MR. BRANUM: So why don't you make</p> <p>2 your offer what you're --</p> <p>3 MS. McELROY: How much longer do you</p> <p>4 have?</p> <p>5 MR. MORRISSEY: I think I probably</p> <p>6 have another hour and a half as long as you</p> <p>7 keep --</p> <p>8 MS. McELROY: No, then we're breaking</p> <p>9 for today. The witness is done.</p> <p>10 MR. MORRISSEY: All right. When will</p> <p>11 you reproduce her for a deposition?</p> <p>12 MS. McELROY: We'll let you know.</p> <p>13 MR. MORRISSEY: Well, I mean, I --</p> <p>14 You can't just walk out of the dep in the</p> <p>15 middle of the dep.</p> <p>16 MS. McELROY: Yes, I can. The</p> <p>17 witness is exhausted. The witness has been</p> <p>18 working for 12 hours. The witness has</p> <p>19 expressed to me that she is tired. The</p> <p>20 witness is done --</p> <p>21 MR. MORRISSEY: Well, let me ask --</p> <p>22 MS. McELROY: -- testifying for</p> <p>23 today.</p> <p>24 MR. MORRISSEY: Let me ask one --</p>
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<p>1 (WHEREUPON, a short break</p> <p>2 was had.)</p> <p>3 MS. McELROY: The witness has been</p> <p>4 here since this morning at about</p> <p>5 6:00 o'clock. She's been going for</p> <p>6 12 hours. She is done for the day. We are</p> <p>7 concluding for today.</p> <p>8 MR. MORRISSEY: Well, I have a few</p> <p>9 more questions before we conclude, so if</p> <p>10 you allow me to ask one more question,</p> <p>11 Ms. McElroy it would be --</p> <p>12 MS. McELROY: Is that your last</p> <p>13 question?</p> <p>14 MR. MORRISSEY: Pardon?</p> <p>15 MS. McELROY: Is that your last</p> <p>16 question?</p> <p>17 MR. MORRISSEY: No, it isn't.</p> <p>18 MS. McELROY: Then we're breaking.</p> <p>19 MR. MORRISSEY: Ms. McElroy, you took</p> <p>20 many breaks, many breaks that you reported</p> <p>21 were going to be for a certain period of</p> <p>22 time and then you extended it. We've only</p> <p>23 gone for five hours, and I'm entitled to</p> <p>24 seven hours.</p>	<p>1 MS. McELROY: No. Do not interrupt</p> <p>2 me, Mr. Morrissey. I will provide you with</p> <p>3 a date when she can come back after we've</p> <p>4 had an opportunity to coordinate our</p> <p>5 schedule. Now that is the end of it. This</p> <p>6 deposition is over for today.</p> <p>7 MR. MORRISSEY: All right. Ms. McElroy,</p> <p>8 will the -- will you pay for the court</p> <p>9 reporter's time because she's going to have</p> <p>10 to come back and --</p> <p>11 MS. McELROY: The court reporter's</p> <p>12 working from home, Mr. Morrissey. If you</p> <p>13 ask her to come back --</p> <p>14 MR. MORRISSEY: Well, I understand --</p> <p>15 MS. McELROY: -- this is your</p> <p>16 deposition.</p> <p>17 MR. MORRISSEY: -- she's working from</p> <p>18 home, but I imagine the court reporter is</p> <p>19 still --</p> <p>20 MS. McELROY: This is your</p> <p>21 deposition. You pay the court reporter.</p> <p>22 (Talking over each other.)</p> <p>23 MR. MORRISSEY: I assume the court</p> <p>24 reporter is still going to be requesting to</p>

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<p style="text-align: right;">Page 238</p> <p>1 be paid.</p> <p>2 (Talking over each other.)</p> <p>3 MS. McELROY: The court reporter is</p> <p>4 working from her home.</p> <p>5 MR. MORRISSEY: So if you're going to</p> <p>6 adjourn the deposition today, I'm only</p> <p>7 requesting that you pay for her attendance</p> <p>8 fee the next time we redepose this witness.</p> <p>9 Do you agree to do that?</p> <p>10 MS. McELROY: No. No. It's your --</p> <p>11 You have to pay for your own court</p> <p>12 reporter. I'm not paying for anything.</p> <p>13 Our client is not paying for anything.</p> <p>14 MR. MORRISSEY: All right. So let</p> <p>15 the record reflect that Ms. McElroy is</p> <p>16 concluding the deposition.</p> <p>17 And next time we have the</p> <p>18 witness, I would ask you to produce all the</p> <p>19 scheduling records for the subclass members</p> <p>20 so that you don't continue to make</p> <p>21 objections that the document that you</p> <p>22 produced somehow is inauthentic and isn't</p> <p>23 valid.</p> <p>24 MS. McELROY: I never said it's</p>	<p style="text-align: right;">Page 240</p> <p>1 STATE OF ILLINOIS)</p> <p>2) ss:</p> <p>3 COUNTY OF C O O K)</p> <p>4 I, Peggy A. Anderson, a Certified</p> <p>5 Shorthand Reporter in the State of Illinois do</p> <p>6 hereby certify:</p> <p>7 That previous to the commencement of</p> <p>8 the examination of the witness, the witness was</p> <p>9 duly sworn to testify the whole truth</p> <p>10 concerning the matters herein;</p> <p>11 That the foregoing deposition</p> <p>12 transcript was reported stenographically by me,</p> <p>13 was thereafter reduced to typewriting under my</p> <p>14 personal direction, and constitutes a true</p> <p>15 record of the testimony given and the</p> <p>16 proceedings had;</p> <p>17 That the said deposition was taken</p> <p>18 before me at the time and place specified;</p> <p>19 That the said deposition was</p> <p>20 adjourned as stated herein;</p> <p>21 That I am not a relative or employee</p> <p>22 or attorney or counsel, nor a relative or</p> <p>23 employee of such attorney or counsel for any of</p> <p>24 the parties hereto, nor interested directly or</p> <p>indirectly in the outcome of this action.</p>
<p style="text-align: right;">Page 239</p> <p>1 inauthentic.</p> <p>2 MR. MORRISSEY: Yes, you did.</p> <p>3 MS. McELROY: What I said is it is</p> <p>4 not the complete scheduling record because</p> <p>5 we have scheduling records for each</p> <p>6 detainee, and you are misconstruing the</p> <p>7 record.</p> <p>8 MR. MORRISSEY: Provide us with those</p> <p>9 records, Ms. McElroy --</p> <p>10 (Talking over each other.)</p> <p>11 THE REPORTER: I'm sorry. I can't</p> <p>12 get everybody talking.</p> <p>13 MR. MORRISSEY: I'd appreciate for</p> <p>14 you to provide us with the records. Thank</p> <p>15 you.</p> <p>16 MS. McELROY: Good-bye,</p> <p>17 Mr. Morrissey.</p> <p>18 MR. MORRISSEY: Have a good evening</p> <p>19 there, Ms. McElroy.</p> <p>20 MS. McELROY: You too.</p> <p>21 MR. MORRISSEY: All right. We're</p> <p>22 off. Thank you, Peggy.</p> <p>23</p> <p>24</p>	<p style="text-align: right;">Page 241</p> <p>1 IN WITNESS WHEREOF, I do hereunto set</p> <p>2 my hand this 13th day of July, 2020.</p> <p>3</p> <p>4</p> <p>5</p> <p>6 </p> <p>7 Peggy A. Anderson</p> <p>8 Certified Shorthand Reporter</p> <p>9 License No. 084-003813</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> <p>23</p> <p>24</p>

TOOMEY REPORTING
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Exhibit D

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