

Deposition of
George Soohoo
January 31, 2020
Volume I

Soohoo
vs.
State of California



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BEFORE THE WORKERS' COMPENSATION APPEALS BOARD
OF THE STATE OF CALIFORNIA

GEORGE SOOHOO,)
)
 APPLICANT,)
)
 VS.) CASE NO. ADJ11815610
)
 STATE OF CALIFORNIA, DEPT)
 CORRS-INST MEN, LEGALLY)
 UNINSURED; STATE COMPENSATION)
 INSURANCE FUND/STATE CONTRACT)
 SERVICES, ADJUSTING AGENCY,)
)
 DEFENDANTS.)
 _____)

DEPOSITION OF
George Soohoo
Friday, January 31, 2020, 10:23 a.m.
VOLUME I

Reported By:
Sabine M. Becker
Job No. 10063411

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Deposition of GEORGE SOOHOO, taken on
behalf of the Defendants, before Sabine M. Becker,
Certified Shorthand Reporter 11347 for the State of
California, commencing on Friday, January 31, 2020,
10:23 a.m. at Law Offices of Philip Cohen, 1550 Hotel
Circle North, Suite 170, San Diego, California.

1 APPEARANCES OF COUNSEL:

2 For the Applicant:

3 Law Offices of Philip Cohen
4 BY: Philip Cohen
5 Attorney at Law
6 1550 Hotel Circle North, Suite 170
7 San Diego, California 92108
8 (619) 297-5100

9 For the Defendants:

10 State Compensation Insurance Fund
11 BY: Stephen Taylor
12 Attorney at Law
13 1615 Murray Canyon Road, Suite 500
14 San Diego, California 92108
15 (619) 209-3200

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1 Friday, January 31, 2020, 10:23 a.m.

2 San Diego, California

3

4 ooOoo

5

6 GEORGE SOOHOO,

7 was called as a witness by and on behalf of the
8 Defendants, and having been first duly sworn by the
9 Certified Shorthand Reporter, was examined and testified
10 as follows:

11

12 EXAMINATION

13

14 BY MR. TAYLOR:

15 Q. Good morning. My name is Stephen Taylor. I'm
16 an attorney in the legal department of State
17 Compensation Insurance Fund who is handling some
18 workers' compensation claims on behalf of the California
19 Department of Corrections. Those claims have been filed
20 by you as a dentist, supervising dentist employee by the
21 Department of Corrections. We're here today to take
22 your deposition as part of the investigation and
23 discovery process in the workers' compensation claims.

24 I have already discussed the fact with your
25 attorney of how complex and detailed your case is

1 because of all the different claims you have made and
2 the history of the incident related to the EEOC
3 investigation, and that it's probably impossible for us
4 to do your deposition in one session so we're going to
5 go until about 12:30 today. We should have started at
6 10:00, but we didn't get started on time. But we will
7 finish up your deposition hopefully within a month or
8 six weeks of today.

9 A. Okay.

10 Q. Have you ever testified in a deposition before?

11 A. Yes.

12 Q. How many times have you been in a deposition
13 before?

14 A. Maybe once.

15 Q. How long ago was that?

16 A. Ten, fifteen years.

17 Q. Was that in connection with some kind of legal
18 proceeding? Was it a workers' compensation claim? Was
19 there some kind of investigation with the Department of
20 Corrections? What was it in connection with?

21 A. It was when I was on the enforcement committee
22 of the Department of Consumer Affairs.

23 Q. So can you give me about the year that happened?

24 A. Between 2000 and 2005 maybe.

25 Q. And you were -- you gave a deposition in that

1 matter?

2 A. I don't recollect.

3 Q. Could it be that you testified in a hearing and
4 not necessarily a deposition where you were sworn under
5 oath to testify in a hearing?

6 A. I don't remember.

7 Q. Well, I don't want to go into extensive detail,
8 but I'm just trying to get your testifying experience
9 before today.

10 Was there some kind of hearing before the
11 Department of Consumer Affairs where you were a witness?

12 A. No.

13 Q. Okay. Where you gave a deposition in a lawyer's
14 office like we're doing here today?

15 A. I don't remember.

16 Q. Have you ever testified in court before?

17 A. No.

18 Q. So is this the first time that you can recall
19 ever giving a deposition where you were being sworn to
20 tell the truth under penalty of perjury just as if you
21 were testifying in court?

22 A. Yes.

23 Q. I know that you met with Mr. Cohen in his office
24 today. I'm assuming that you guys discussed the
25 deposition and how it takes place and the fact that you

- 1 are giving testimony under penalty of perjury?
- 2 A. Yes.
- 3 Q. Are you on any medications right now?
- 4 A. Yes.
- 5 Q. What do you take?
- 6 A. HCTZ.
- 7 Q. What is that?
- 8 A. Hydrochlorothiazide for blood pressure.
- 9 Q. Okay.
- 10 A. Amlodipine.
- 11 Q. Spell that, please?
- 12 A. A-m-l-o-d-i-p-i-n-e.
- 13 Q. What is that for?
- 14 A. Blood pressure.
- 15 Q. Okay.
- 16 A. Fenofibrate.
- 17 Q. Spell that, please?
- 18 A. F-e-n-o-f-i-b-r-a-t-e.
- 19 Q. What is that for?
- 20 A. Part of controlling the lipids. I'm not sure.
- 21 Q. Anything else?
- 22 A. Metformin for diabetes.
- 23 Q. Spell that, please?
- 24 A. M-e-t-f-o-r-m-i-n.
- 25 Q. Is that for diabetes?

1 A. Yes.

2 Q. Anything else?

3 A. Lovastatin.

4 Q. Spell that, please?

5 A. L-o-v-a-s-t-a-t-i-n.

6 Q. What is that for?

7 A. It's a statin medication.

8 Q. For what?

9 A. For controlling cholesterol.

10 Q. Anything else?

11 A. I have a -- I don't remember. The psychiatrist
12 gave me one for depression and one is for sleep, anti
13 anxiety medication.

14 Q. Is that xanax?

15 A. No.

16 Q. The depression medication, do you remember the
17 name of that?

18 A. No.

19 Q. Anything else?

20 A. I take a lot of supplements.

21 Q. I'm just talking about medications.

22 A. No.

23 Q. Any of these medications do you believe will
24 affect your ability to think and remember and give your
25 best testimony today?

1 A. I don't know.

2 Q. Okay. We need to have your best and most
3 complete testimony today. That's why we're here.
4 Because after this deposition is over with, your
5 testimony, which will be mostly my questions and your
6 answers, may be commented on or objected by your
7 attorney.

8 It will be transcribed into a booklet form. And
9 in the near future we're going to give you the right to
10 review that booklet form later on when the transcript is
11 done in maybe another month or so. You will have a
12 right to read the transcript, and if you think it's
13 necessary or appropriate you will be able to change your
14 answers to make it something more correct or add to your
15 answers if you think you need to, if you believe it's
16 necessary or that you need to do that?

17 But I must caution you that if you do change
18 your answers later on from what you say here today where
19 I'm not there to question you on the changes, then I or
20 someone else can comment on that to anybody who is using
21 this deposition in the future like the judge in your
22 case, or the doctors, or anybody else evaluating your
23 case by reading your deposition, the fact that you
24 changed your answers from what you said here today. And
25 I'll be able to question you about the changes.

1 So it's important that you give me your best and
2 most complete testimony today so you don't have to
3 change your answers. Any time before we leave today if
4 I'm still here, if the reporter is still here, you
5 remember something that you said or something that you
6 forgot and you want to add to it or change your answers
7 before we leave, you can do that. The problem is
8 changing your answers later on when you read the
9 deposition transcript.

10 Do you understand?

11 A. Yes.

12 Q. In order to give me your best and most complete
13 testimony today, try to remember a few general rules.

14 Number one is don't answer a question you don't
15 understand. If you don't understand my questions you
16 can ask me to restate or rephrase them for you. If you
17 still don't understand them, you can have a discussion
18 with your attorney and he can help you with it. But you
19 can't go out and talk to your attorney when I've asked
20 you a question to ask him how to answer the question.

21 Do you understand that?

22 A. Yes.

23 Q. You have to speak out loud so the court reporter
24 can take down what you are saying.

25 And the second rule is, don't ever give me a

1 pure guess as an answer. Because of the nature of your
2 claim and your work history, we may ask questions that
3 have to do with dates that something happened, numbers
4 or times that something happened, or other things that
5 will require you to use your memory. We want to have
6 your best approximation or estimate if you have one, but
7 we don't want a pure guess.

8 Do you understand the difference between an
9 estimate and a pure guess?

10 A. Yes.

11 Q. Okay. A pure guess is just giving an answer
12 when you don't really know at all. You are just
13 guessing. We don't want that.

14 But an estimate is doing your best to recall
15 something. And if you think something took a certain
16 amount of time, just tell us that it's an estimate or an
17 approximation. Just let us know. Because if you don't
18 say, I'm estimating or I'm approximating, then the
19 record will show that your answer is a complete precise
20 answer.

21 Do you understand?

22 A. Yes.

23 Q. Always answer out loud and loud enough so our
24 reporter can take down everything you are saying. She
25 can't take down shaking of the head or nods of the head

1 or uh-huh or huh-uh. She can't take down gestures with
2 your hand.

3 If you do have to use gestures with your hands
4 for some reason, then just say so and I will describe
5 what you are doing with your hands as best as I can on
6 the record so our court reporter can take it down.
7 Other than that, you have to give an answer loud and out
8 loud and speak orally so our court reporter can take
9 down everything you are saying.

10 Do you understand?

11 A. Yes.

12 Q. Always let me finish my questions completely
13 before you begin your answer. If we're both talking at
14 the same time interrupting each other, our court
15 reporter will have a very difficult time taking us both
16 down. And I will try to extend the same courtesy for
17 you.

18 From time to time your attorney may object to my
19 question. It's very standard or routine. Allow him to
20 make his objection and then give me an answer.

21 Sometimes your attorney might instruct you not
22 to answer a question if he thinks for some reason my
23 question is not right or correct or proper. That
24 happens every once in a while. Not a lot. But if he
25 does do that, you are, of course, entitled to follow his

1 advice because he's your attorney.

2 But I have to give you a warning ahead of time
3 that if I think he's wrong and there's nothing wrong
4 with my question and you should answer it, then I'm
5 going to ask you if you are going to take his advice.
6 And if you do, then I have a chance to go down to the
7 court and ask for a court order that you answer the
8 question. If the court agrees with me and we have to
9 come back and do it all over again, there might be some
10 fines to pay or things like that.

11 Do you understand?

12 A. Yes.

13 Q. You can take a break for any reason if you need
14 a break. If you'd like to go to the bathroom, or to get
15 a drink of water, make a phone call or just take a break
16 and rest yourself for a while, just let us know. But
17 you cannot take a break and go out and have your
18 attorney tell you how to answer a question.

19 Do you understand that?

20 A. Okay.

21 Q. Please try to speak up, sir. Our reporter is
22 having a hard time taking you down today.

23 Now, we're going to talk, obviously, about your
24 job with the Department of Corrections, we're going to
25 talk about your health history, we're going to talk

1 about your psych history because you have a psych claim.
2 We'll talk about your medical treatment, your doctors
3 that have treated you, and your health plan and all
4 that. Okay?

5 A. Yes.

6 Q. First of all, these medications that you listed,
7 I've listed at last six or seven different kinds. And
8 you said you don't think that they are going to affect
9 your ability to testify or you don't know if they are.
10 Is that correct?

11 A. Yes.

12 Q. The idea, though, is that we don't want to waste
13 our time here today only to have you in the future say,
14 he can't hold me to those answers because I was on
15 medications.

16 Do you understand?

17 A. Yes.

18 Q. So would it be your intention in the future to
19 ever do that, to say after this deposition that you
20 can't hold me to my answers because I didn't know what I
21 was saying because I was on medications? Do you
22 understand?

23 A. Can you repeat your question?

24 Q. I said, are you going to claim in the future
25 that I can't hold -- nobody can hold you to the answers

1 you gave in this deposition because you were taking
2 medications today while we're in your deposition? If
3 you are going to claim that, we're kind of wasting our
4 time right now.

5 Do you understand?

6 A. Yes.

7 Q. Do you believe that you will ever claim that
8 these medications will cause you to not be able to give
9 proper testimony?

10 A. No.

11 Q. Okay.

12 A. Just to let you know, I have a tough time
13 hearing because I'm not wearing my hearing aids because
14 I have vertigo.

15 Q. Okay. You're not wearing your hearing aids
16 today?

17 A. I have it, but I didn't wear it.

18 Q. Well, if you can't hear me when I'm asking
19 questions or your attorney is commenting, just say so
20 and I'll try to speak up.

21 A. Okay.

22 Q. Could you tell me which doctors you have that
23 are prescribing these medications?

24 A. Dr. Alexander Berdy.

25 Q. Is that a primary treating doctor?

- 1 A. Yes.
- 2 Q. Is that through your health plan through your
3 job with Department of Corrections?
- 4 A. With my wife's.
- 5 Q. Your wife's health plan?
- 6 A. Yes.
- 7 Q. What is your wife's name and age, please?
- 8 A. Teodorika.
- 9 Q. Spell that, please?
- 10 A. T-e-o-d-o-r-i-k-a.
- 11 Q. How long have you been married to her? This is
12 one of those estimates.
- 13 A. Twelve years estimate.
- 14 Q. Does your wife go by the last name Soohoo as
15 well?
- 16 A. Yes.
- 17 Q. Does she work for the Department of Corrections?
- 18 A. No.
- 19 Q. Does she work for state of California?
- 20 A. No.
- 21 Q. Is she employed in the private sector somewhere?
- 22 A. Yes.
- 23 Q. What does she do?
- 24 A. She's a medical assistant.
- 25 Q. What is her health plan that you are treating

- 1 under?
- 2 A. Kaiser.
- 3 Q. Do you have your Kaiser card with you?
- 4 A. Yes.
- 5 Q. Can you please pull it out so I can get some
6 numbers from you? Phil, he's showing me his card. Let
7 the record show that -- is it Dr. Soohoo?
- 8 A. Yes.
- 9 Q. Let the record reflect that Dr. Soohoo has
10 handed me his Kaiser card with the name George M.
11 Soohoo. What does the M stand for?
- 12 A. Mane, M-a-n-e.
- 13 Q. With a date of birth -- what is your specific
14 date of birth?
- 15 A. November 28, 1953.
- 16 Q. And prefix medical record number is
17 000008075404. So this prefix medical record number, is
18 that basically your patient ID with Kaiser?
- 19 A. From my understanding it's my medical record
20 membership number.
- 21 Q. Okay. How long have you been treating under
22 Kaiser? It's an HMO. How long have you been treating
23 under your wife's health plan?
- 24 A. Approximately fifteen, twenty years.
- 25 Q. So if we wanted to get your ongoing treatment,

1 medical record treatment for the last fifteen to twenty
2 years it would be through Kaiser?

3 A. Yes.

4 Q. I'm not sure if we've sent you medical
5 authorization release forms yet to allow us to get your
6 medical records. But if we sent that to you and through
7 your attorney, would you agree to sign that medical
8 release as part of our discovery?

9 A. Yes.

10 Q. Okay. I'm returning this card to you.
11 By the way, can you give me your social security
12 number?

13 A. 562-78-4407.

14 Q. Okay. Can you show me your California driver's
15 license number, please? Thank you.

16 Let the record show that Dr. Soohoo has handed
17 me a California driver's license number card with the --

18 MR. COHEN: I don't want to put the driver's
19 license number on the record. Can we go off the record
20 for that?

21 MR. TAYLOR: Okay. We'll go off the record.

22 (Discussion held off the record.)

23 BY MR. TAYLOR:

24 Q. I asked Dr. Soohoo if his license was still
25 current and effective. He said yes. Is that correct?

1 A. Yes.

2 Q. I asked if there is any restrictions?

3 A. No.

4 Q. And he said no except glasses. Is that correct?

5 A. Yes.

6 Q. And I asked if it has ever been suspended or

7 revoked for any reason, and you said no. Is that

8 correct?

9 A. Yes.

10 Q. It shows here that you are a veteran. Were you

11 in the military?

12 A. Yes.

13 Q. What branch of the military were you in?

14 A. Army.

15 Q. What years were you in the army?

16 A. Approximately 1994 to 2013.

17 Q. It's my understanding that you have been working

18 with the California Department of Corrections during

19 those years. Are you telling me that you were in the

20 army reserves?

21 A. Yes.

22 Q. Why did you decide to join the army reserves?

23 A. To serve.

24 Q. What was your last classification or job title

25 or job duty in the reserves?

1 A. As a dentist 63 Alpha.

2 Q. What does that mean?

3 A. That's the M-o-n.

4 Q. What does that mean?

5 A. Kind of like your code for your job position.

6 Q. What did the reserves require you to do as far

7 as with that classification being in the reserves? Give

8 me the description of what that actually meant for you

9 as far as taking time off of work and having to go be

10 deployed somewhere. Describe that.

11 A. Number one is I wanted the opportunity to

12 travel, number two is the opportunity to serve, number

13 three was humanitarian issues.

14 Q. Those might have been your motivations for being

15 in the reserves, and that's fine and good. But I'm just

16 asking you what your actual service required. Did this

17 require you to go in --

18 MR. COHEN: Do you want to know his duties?

19 MR. TAYLOR: Yes.

20 THE WITNESS: It varied because on the unit I was

21 assigned to at the time, I initially was assigned to a

22 field unit. It's a medical company.

23 Q. Where was it stationed?

24 A. It was a medical detachment at that time. It

25 was in Los Alamitos, California.

1 Q. So what did your duties require of you as part
2 of that medical detachment?

3 A. Drills, we would prepare ourselves for going out
4 and set up our field units with medical units to serve
5 in case of any kind of war. We would be the backup
6 services to provide for the soldiers.

7 Q. How often would you have to do that? In other
8 words, leave your civilian life and your job and leave
9 home and go and serve in the reserves?

10 A. Every weekend. Once a month and two weeks out
11 of the year we would go out and do assignments or we
12 would get assignments. Every weekend we come in on
13 weekends drills, we prepare ourselves to be a soldier.

14 Q. Did you go to a certain place for these drills?

15 A. Yes, Los Alamitos.

16 Q. So all your service was always at Los Alamitos?

17 A. No.

18 Q. Where else was it?

19 A. I went to Fort Lewis in Tacoma, Washington.
20 Then I went to war college and became a brigade
21 commander.

22 Q. Where was the war college?

23 A. Carlisle, Pennsylvania. I really got into
24 history and I love war strategy.

25 Q. Okay.

1 A. So I went to managerial staff school and
2 advanced war college because at that time I wanted to
3 move up.

4 **Q. So each time you went to these colleges, how**
5 **long did you spend there?**

6 A. War college is two years.

7 **Q. So you actually moved to Pennsylvania?**

8 A. No, we would go every year, two to three weeks
9 at Carlisle, then the rest was on the computer.

10 **Q. So what year was this that you went every year**
11 **for two to three weeks a year to Carlisle, Pennsylvania?**

12 A. I graduated in 2008 so it was maybe 2006 to
13 2008, approximately.

14 **Q. Are you still in the reserves?**

15 A. No, I retired.

16 **Q. When did you retire from the reserves?**

17 A. 2013.

18 **Q. Any specific reason why you retired from the**
19 **reserves?**

20 A. I had to take care of my ninety-nine-year-old
21 mother.

22 **Q. Is your mother still alive?**

23 A. She passed away.

24 **Q. Sorry to hear that. When did she pass away?**

25 A. 2016.

1 Q. So you retired in 2013 to take care of your
2 mother?

3 A. Yes.

4 Q. Did you ever consider going back in the reserves
5 or you are done with that?

6 A. I'm done with that.

7 Q. Did you have a different health care provider
8 that you used when you were with the army reserves?

9 A. We can only use the VA where we had actual
10 orders.

11 Q. So when you were actually deployed on some kind
12 of orders like Los Alamitos or at war colleges doing
13 some kind of active service you used the VA?

14 A. Or the military health care facility.

15 Q. That would be through the VA?

16 A. No. Like when I got deployed I was at Fort
17 Riley, Kansas so I went to a medical clinic there.

18 Q. What for?

19 A. I would have some back and knee issues.

20 Q. What year was that that you had back and knee
21 issues where you went to Fort Riley, Kansas military
22 medical?

23 A. I do not remember.

24 Q. Can you give me an approximation? Was it in the
25 2000s?

1 A. Maybe 1998.

2 Q. Was there any kind of specific condition or
3 specific incident or something specific that happened
4 that gave you these back and knee issues where you went
5 to get medical help through the military in Fort Riley,
6 Kansas?

7 A. Sometimes it's training, sometimes we have to
8 prepare ourselves for our exercises, our run. We have
9 to qualify every six months. Things like that.

10 Q. How do you qualify? What do you have to do to
11 qualify? Do you go to a location and do specific
12 obstacle courses or exercise?

13 A. Yes, we have to do a two-mile run, swimming,
14 push-ups in a certain amount of time, and sit-ups.

15 Q. Where were these qualifications that you had to
16 do? Was it in Los Alamitos?

17 A. Wherever you were.

18 Q. Did you ever have any specific significant
19 injuries other than your back and knees when you were
20 serving through the army reserves at any location of any
21 kind? By significant I mean something more than just
22 stubbing your toe or a paper cut or a small bruise or
23 something like that.

24 A. In 1996 an explosive kind of blew up in front of
25 me. I had some hearing issues.

1 Q. Was that a grenade?

2 A. I'm not sure because I was at Fort Sam Houston
3 in Texas. It was an exercise drill, night training
4 navigation exercise. It's pitch black.

5 Q. The ordinance that went off, do you remember
6 about how close up you were to that?

7 A. Pretty close.

8 Q. Is that two feet or is that ten feet?

9 A. I'm not sure. I do not know.

10 Q. Did it knock you unconscious?

11 A. No.

12 Q. Did you have any cuts or bruises or any kind of
13 wounds other than the fact that it went off and it was a
14 loud bang?

15 A. No.

16 Q. So you didn't have any cuts or bruises or broken
17 --

18 A. No.

19 Q. Were you dressed in uniform at the time and
20 wearing a helmet?

21 A. Yes.

22 Q. Was anybody else involved in getting that
23 ordinance going off?

24 A. We were a night navigation with a group.

25 Q. Okay. Did you have to go to a medical facility

1 after that happened to check you out?

2 A. No.

3 Q. Is that when your hearing issues started with
4 that incident with the ordinance going off near you?

5 A. No.

6 Q. When did your hearing issues start?

7 A. I'm not sure.

8 Q. But you say it started before that 1996
9 explosion incident with the training exercise at Fort
10 Sam Houston?

11 A. I'm not sure.

12 Q. Okay. Do you have a VA card?

13 A. Yes.

14 Q. Can you show it to me, please? Show it to your
15 attorney first.

16 Let the record show Dr. Soohoo has handed me a
17 VA card with the member ID number 1173353070. And the
18 plan ID with two numbers in it. (80840). And that's in
19 parenthesis. But also plan ID number 7346243588.

20 Have you been treating through the VA for
21 anything in the last ten years?

22 A. Yes.

23 Q. Where do you treat through the VA? What
24 facility did you go to?

25 A. VA in Long Beach.

1 Q. For how long have you been treating at the VA
2 facility at Long Beach?

3 A. Approximately three, four years.

4 Q. What have you been treating through the VA at
5 Long Beach?

6 A. I've been seeing a psychiatrist and a
7 psychologist there.

8 Q. Anything else?

9 A. I also have a primary care, Dr. Shah, which is
10 in Santa Ana.

11 Q. Dr. Shah, is that a man or woman?

12 A. Man.

13 Q. Spell that name, please?

14 A. S-h-a-h.

15 Q. Do you know Dr. Shah's first name?

16 A. I think it might be on my phone. K-a-r-t-i-k,
17 Kartik.

18 Q. And his offices are in Santa Ana?

19 A. It's a clinic in Santa Ana.

20 Q. Do you know the name of the clinic?

21 A. All I have is a phone number. (562) 826-8000.

22 Q. And the treatment by Dr. Shah has been through
23 the VA?

24 A. Yes.

25 Q. What are the names of the treating psychologist

1 or psychiatrist?

2 A. Shawn Chung is the psychiatrist.

3 Q. Okay.

4 A. C-h-u-n-g. First name is Shawn, S-h-a-w-n?

5 Q. Okay. And who is the psychologist?

6 A. I don't remember his name.

7 Q. How long have you been under Dr. Chung's

8 treatment as a psychiatrist?

9 A. A couple of years.

10 Q. And that's the VA, in Long Beach?

11 A. Yes.

12 Q. If we send you medical release forms for the VA

13 Long Beach as well as Dr. Shah, would you have any

14 problems signing them?

15 A. I already signed them.

16 Q. Okay. Well, we'll look into that. A lot of

17 times there's confusion and it's an ongoing thing all

18 the time whether these things have been signed or not

19 and whether we can use them. Sometimes the VA and other

20 plans just give us a hard time saying these are

21 improperly signed. But if for some reason we need you

22 to sign them again, is that okay?

23 A. Yes.

24 Q. Okay. Thank you. I'm going to hand you your VA

25 card back.

1 You also mentioned that there is a Dr. Alexander
2 Berdy that is treating you through your wife's
3 healthcare plan at Kaiser; is that correct?

4 A. Yes.

5 Q. What kind of doctor is Dr. Berdy?

6 A. An internist.

7 Q. How long have you been treating with Dr. Berdy?

8 A. Four to five years.

9 Q. What is Dr. Berdy treating you for?

10 A. Lately or the medications he's giving me?

11 Q. Well, we have to start somewhere. Just start
12 with what he first started treating you for when you
13 first started to go see him? When did you first go see
14 Dr. Berdy?

15 A. I moved so I went to Dr. Berdy where I was
16 living at that time, so I got assigned to Dr. Berdy.

17 Q. Where did you make the move to?

18 A. I moved from Buena Park to Corona Del Mar.

19 Q. And what year was that?

20 A. 2005.

21 Q. And Dr. Berdy was a Kaiser doctor that was close
22 to that location, that's why you started to see him?

23 A. I saw some other doctor before him. Dr. Tracy
24 was another one.

25 Q. Is that a man or a woman?

- 1 A. A man.
- 2 Q. Are you looking up his first name?
- 3 A. Yes. Jeff Tracy.
- 4 Q. But it was at the same Kaiser medical facility
5 as Dr. Berdy?
- 6 A. He used to be in Mission Viejo where my wife
7 works and then he moved down to San Juan and that was
8 too far.
- 9 Q. So you treated for a while with Dr. Tracy but
10 then he moved to San Juan?
- 11 A. Yes.
- 12 Q. And you were closer to where Dr. Berdy was?
- 13 A. Yes.
- 14 Q. And that's when you moved to Corona Del Mar in
15 2005?
- 16 A. Yes.
- 17 Q. And it was all through Kaiser?
- 18 A. Yes.
- 19 Q. What kind of doctor is Dr. Tracy?
- 20 A. Family practice.
- 21 Q. And Dr. Berdy is an internist?
- 22 A. From my understanding. I'm not sure.
- 23 Q. So what have you been treating through Dr. Berdy
24 for?
- 25 A. Diabetes, hypertension, hyperlipemia. He was

1 referring me to physical therapy for my back.

2 Q. Okay.

3 A. And he also referred me to a specialist because
4 I had kidney cancer.

5 Q. Okay.

6 A. And also now I have been diagnosed with a lung
7 nodule which is possible cancer so I'm going to have to
8 go back in for the second CT scan.

9 Q. What kind of diabetes do you have?

10 A. Type two.

11 Q. When did you first get diagnosed with type two
12 diabetes?

13 A. I had prediabetes maybe 1998 or something like
14 that. I just don't remember.

15 Q. Well, who was -- was Dr. Tracy and Dr. Berdy
16 treating you for your diabetes?

17 A. Yes.

18 Q. And you said you had been diagnosed with kidney
19 cancer?

20 A. Yes, I went to a specialist.

21 Q. Was he a nephrologist or oncologist?

22 A. He was a urologist.

23 Q. Who was your urologist?

24 A. Dr. Wesley Choi through Kaiser.

25 Q. What year was that that you were diagnosed with

1 kidney cancer?

2 A. 2018.

3 Q. What is the status of your kidney cancer at this
4 point?

5 A. I won't know yet because I just had my whole
6 kidney removed and I was diagnosed with adenocarcinoma.

7 Q. When was your kidney removed? Was it your left
8 or your right?

9 A. Right.

10 Q. When was it removed?

11 A. Approximately June of last year.

12 Q. Of 2019?

13 A. Yes.

14 Q. What hospital was it removed at?

15 A. Did I tell you the diagnosis was in 2018 as
16 well?

17 Q. Okay. What hospital was it removed at?

18 A. Sand Canyon right off of the 405. Kaiser.

19 Q. What city was that in?

20 A. I think it's Irvine. I'm not sure.

21 Q. Okay. But they diagnosed you with
22 adenocarcinoma?

23 A. Yes. They removed it and then they did the
24 biopsy so it was confirmed. It was a large cancer
25 growth. They could not do a partial because it was just

1 too big.

2 Q. Was there any news about whether it metastasized
3 anywhere to any other parts of your body?

4 A. That's why in the next sixty days I'll probably
5 go back in for another CT scan.

6 Q. Who is the doctor that treated you for the
7 kidney removal?

8 A. Dr. Choi.

9 Q. So Dr. Choi is doing the whole thing?

10 A. Yes.

11 Q. And these other doctors; Dr. Tracy, Dr. Berdy,
12 Dr. Choi, if for some reason we need additional medical
13 release forms, do you have any problems signing those?

14 A. No. The psychologist that you wanted is not
15 veterans.

16 Q. Which psychologist was that? You said Dr.
17 Chung.

18 A. He's a psychiatrist.

19 Q. Right.

20 A. I was seeing a psychologist too.

21 Q. Who is the psychologist?

22 A. Laurence Woodburn.

23 Q. He's not through Kaiser?

24 A. No.

25 Q. Are you still seeing Dr. Woodburn?

- 1 A. Yes, maybe once every six months.
- 2 Q. **Where is Dr. Woodburn's offices?**
- 3 A. Carlsbad, California.
- 4 Q. **Did your attorney send you to see Dr. Woodburn?**
- 5 A. I looked it up under the workers' comp.
- 6 Q. **So the MPN?**
- 7 A. Whatever that is.
- 8 Q. **The network?**
- 9 A. Yes. He said that was approved for six
10 sessions. And the one lady at the time after my first
11 session, she went with me and said the second one she
12 canceled because she was getting ready to retire that
13 same day.
- 14 Q. **Was that Dr. Deboski?**
- 15 A. Yes.
- 16 Q. **So as far as you know Dr. Deboski is retired?**
- 17 A. Yes, that's why I had to find another.
- 18 Q. **So Dr. Woodburn just took over where Dr.**
19 **Deboski had been seeing you before?**
- 20 A. Yes.
- 21 Q. **Dr. Shah, where is his office?**
- 22 A. Santa Ana. It's a VA medical clinic.
- 23 Q. **Okay. You also said you have a lung nodule?**
- 24 A. Yes.
- 25 Q. **When was that found or detected?**

1 A. Maybe two months ago, approximately.

2 Q. How did that discovery come about? Were you
3 having symptoms or you just had a routine x-ray of your
4 chest?

5 A. CT scan.

6 Q. What was the CT scan for?

7 A. There was something that Dr. Choi ordered after
8 the surgery removing the kidney.

9 Q. So you had an abdominal CT scan and they saw a
10 lung nodule?

11 A. And he also ordered a chest CT scan.

12 Q. About when was that?

13 A. About a month and a half.

14 Q. Did you -- have you ever smoked?

15 A. No. Oh, when I was a kid.

16 Q. Okay. When was the last time you smoked?

17 A. I don't remember.

18 Q. Well, if you were born in 1953 you're probably
19 sixty-five or close to sixty-six now?

20 A. Yes.

21 Q. Let's say from your twenties all the way up to
22 today, did you ever smoke in your twenties all the way
23 up to today?

24 A. No.

25 Q. The nodule, has there been any biopsies on that

1 or anything to see what it is?

2 A. I'm scheduled to see an oncologist in two weeks.

3 Q. Who is your oncologist?

4 A. I have not seen him yet.

5 Q. You don't know who it is?

6 A. They gave me a name. I don't remember. They
7 gave me a name. I just haven't met him yet.

8 Q. Okay. But that's going to be in another couple
9 of weeks?

10 A. Yes.

11 Q. But that's through Kaiser?

12 A. Yes.

13 Q. Have you ever -- since your work with the
14 Department of Corrections have you ever used the state
15 of California Department of Corrections health plan?

16 A. I was on Blue Cross Blue Shield with the
17 department in 1994. It was not an HMO. It was an
18 indemnity plan. My first diagnosis of my sleep apnea at
19 that time was then because they sent me to Orange,
20 California to take a sleep test.

21 Q. Do you have your Blue Cross card?

22 A. No, I don't have that anymore.

23 Q. If we were to send you a medical release form
24 through the Blue Cross health plan in the state of
25 California, do you have any problems signing that?

1 A. No.

2 Q. But you were diagnosed with sleep apnea in 1994?

3 A. Yes.

4 Q. So when I was asking you about all those
5 medications that you said you are on today, you said Dr.
6 Berdy is one of the prescribing doctors.

7 Is there any other prescribing doctors? You
8 listed like seven medications. Who else besides Dr.
9 Berdy is prescribing those for you?

10 A. Dr. Chung is the two medications for the psych.

11 Q. So Dr. Berdy and Dr. Chung are these doctors
12 that are prescribing all the medications you listed for
13 me today?

14 A. Yes.

15 Q. What is your current height and weight?

16 A. 5-3, 185.

17 Q. And how long have you been in that weight
18 category going back in time?

19 A. Last two or three years. Or four.

20 Q. I know that oftentimes very commonly sleep apnea
21 goes along with being overweight. So in 1994 you were
22 being treated for sleep apnea. How much were you
23 weighing back then?

24 A. Probably 150, 160.

25 Q. So you've gained thirty or forty pounds since

1 1994?

2 A. Yes.

3 Q. Are you still -- do you still have sleep apnea?

4 A. Yes.

5 Q. Are you doing anything specific for it? Do you
6 have a special bed frame or do you wear a c-pap machine?

7 A. I have a bi-pap machine.

8 Q. It's different than a c-pap?

9 A. Yes.

10 Q. And who prescribed that for you?

11 A. Initially it was at the sleep center in Orange,
12 California. Then when I went to Kaiser I gave them a
13 copy of the sleep test. Kaiser didn't do a sleep test
14 because there was one already done and they just
15 continued on.

16 Q. So the sleep test in Orange, do you remember the
17 name of the sleep center?

18 A. It was at a hospital.

19 Q. But you did that through Kaiser?

20 A. No.

21 Q. Through the VA?

22 A. No, it was through Blue Cross.

23 Q. Okay.

24 A. I spent the night there. It was recommended. I
25 had a deviated septum and had surgery. I did a lot of

1 research. And even that, that didn't cure it. I didn't
2 feel right. I got a second opinion and I just didn't
3 feel like it was going to resolve my issue.

4 **Q. But since 1994 has your sleep apnea situation**
5 **basically stayed the same?**

6 A. Yes.

7 **Q. But you have been using the bi-pap since 1994?**

8 A. Yes.

9 **Q. What is the difference from a bi-pap than a**
10 **c-pap?**

11 A. I don't know. Except -- I just don't know.

12 **Q. Do you use it every night?**

13 A. Yes.

14 **Q. Can you give me your present resident address,**
15 **please?**

16 A. 3682 Herman Avenue, San Diego, California,
17 92104.

18 **Q. What neighborhood is that in?**

19 A. North Park.

20 **Q. Is it a house or apartment?**

21 A. A house.

22 **Q. How long have you lived there?**

23 A. I've lived there on and off.

24 **Q. For how long?**

25 A. Ten years.

1 Q. When you say that, does that mean it's an
2 investment property and sometimes you live there and
3 sometimes not?

4 A. No because my brother -- it's my brother's
5 house.

6 Q. So he owns it?

7 A. Yes.

8 Q. Okay.

9 A. I'm in the midst of remodeling my house so I
10 can't live in it.

11 Q. But you live there with your wife?

12 A. Yes.

13 Q. So is it just you and your wife?

14 A. Yes.

15 Q. Where is the house that you are having
16 remodeled?

17 A. 2506 Lighthouse Lane in Orange.

18 Q. How long have you owned that house?

19 A. Since 2005.

20 Q. And you live there with your wife?

21 A. Yes.

22 Q. Do you guys have any kids together?

23 A. No.

24 Q. Do you have any kids at all from any past
25 marriages or anything?

1 A. No.

2 Q. How long have you and your wife been married?

3 MR. COHEN: I think he said twelve years.

4 THE WITNESS: Approximately.

5 BY MR. TAYLOR:

6 Q. Is this your first marriage?

7 A. No.

8 Q. How many times have you been married?

9 A. This is my second.

10 Q. Do you have any contact with your ex-wife?

11 A. No.

12 Q. Could you tell me what year you were divorced
13 in?

14 A. Approximately 1988.

15 Q. What was your ex-wife's name?

16 A. Adrienne.

17 Q. When was the last time you spoke or saw
18 Adrienne?

19 A. Fifteen years ago.

20 Q. Did Adrienne work for the Department of
21 Corrections in the state of California?

22 A. No.

23 MR. TAYLOR: Let's stop for a second.

24 (Recess taken.)

25 BY MR. TAYLOR:

1 Q. Dr. Soohoo, how long have you owned the house on
2 Lighthouse Lane in Orange?

3 A. Since 2005.

4 Q. Where did you live before you moved to that
5 house?

6 A. Buena Park.

7 Q. Why did you leave Buena Park to move to Orange?

8 A. I was working for the Department of Juvenile
9 Justice. That was in Norwalk which is very close to
10 Buena Park.

11 Q. So Department of Juvenile Justice, was that with
12 the county or was that with the state?

13 A. The state.

14 Q. How long did you work with the Department of
15 Juvenile Justice?

16 A. Thirteen years.

17 Q. Give me the starting and ending date when you
18 were with Department of Juvenile Justice?

19 A. 1998, approximately, to 2000 maybe.

20 Q. What was your job duty or classification with
21 the Department of Juvenile Justice?

22 A. Chief dentist. They downgraded the position
23 throughout the state.

24 BY MR. COHEN:

25 Q. Just answer his question. He didn't ask you

1 about downgrading. He just said, what was your
2 position. Was that your position, chief dentist?

3 A. Yes.

4 Q. Then you answered his question.

5 BY MR. TAYLOR:

6 Q. When you said they downgraded the position
7 throughout the state, what did you mean by that?

8 A. Throughout the state they reorganized or
9 restructured.

10 Q. Did they eliminate the chief dentist job?

11 A. No.

12 Q. So what does downgrading mean in terms of your
13 position and your job and how it affected you?

14 A. It changed the job description from basic
15 administrative to clinical.

16 Q. Meaning whereas before you were more
17 administrative doing office work and managing employees
18 back to clinical where you are doing actual hands-on
19 dental work?

20 A. Yes.

21 Q. And that was in 2005 they changed that?

22 A. I don't remember.

23 Q. Did you prefer to stay in the administrative
24 position?

25 A. I prefer both.

1 Q. Okay. Once they downgraded that job though, is
2 that when you left the Department of Juvenile Justice?

3 A. No.

4 Q. Was the Department of Juvenile Justice an agency
5 or division of the Department of Corrections?

6 A. Yes.

7 Q. So when you were with the Department of Juvenile
8 Justice you were still employed by the Department of
9 Corrections as far as you knew?

10 A. I think so.

11 Q. Because it's my understanding that you first
12 went to work for the Department of Corrections in 1994;
13 is that correct?

14 A. Yes.

15 Q. Why did you end up going through the division of
16 the Department of Juvenile Justice in 1998?

17 A. I was in headquarters.

18 Q. Where was headquarters?

19 A. In Sacramento.

20 Q. Was that in the Department of Corrections?

21 A. Yes.

22 Q. What does that have to do with you going into
23 the Department of Juvenile Justice?

24 A. Because as they were growing they needed
25 representation at headquarters to facilitate other

1 institutes for dental care.

2 MR. TAYLOR: Hold on a second. Let's go off the
3 record.

4 MR. COHEN: Yes. Let's take a break, please.

5 (Recess taken.)

6 BY MR. TAYLOR:

7 **Q. So in 1998 you were already working in**
8 **Sacramento for the Department of Corrections in**
9 **administrative capacity?**

10 A. Yes. I opened the institution at Ironwood for
11 corrections and they liked the way I opened it. So the
12 chief medical administrator wanted me because she was
13 going to Department of Juvenile Justice and they had a
14 lot of problems with Department of Juvenile Justice.

15 **Q. So who was the person that liked the way you**
16 **opened up?**

17 A. Dr. Gwendolyn Dennard.

18 **Q. What was her job title? Who did she work for?**

19 A. At that time Department of Corrections and then
20 she moved to Department of Juvenile Justice.

21 **Q. So she liked your reputation as to what you did**
22 **opening up the Ironwood State Prison dental program and**
23 **so she asked you to come over with her to Department of**
24 **Juvenile Justice?**

25 A. Yes. The person that moved into the

1 headquarters in Sacramento was Dr. Covington who was the
2 chief medical officer in the Department of Corrections.

3 Q. That's who you worked for?

4 A. I did, yes, and then he passed away.

5 Q. Okay.

6 A. And so did Dr. Dennard.

7 Q. So Dr. Dennard is deceased?

8 A. Yes.

9 Q. So who is the other doctor?

10 A. Dr. Covington.

11 Q. And he was -- what was his position with the
12 Department of Corrections?

13 A. He was the chief medical director in Sacramento.

14 Q. For the Department of Corrections?

15 A. Yes.

16 Q. And you worked under him when you opened up the
17 Ironwood dental program?

18 A. No, he's the one that approved me to Sacramento.

19 Q. So in 1994 is when you first started working
20 with the Department of Corrections?

21 A. Yes.

22 Q. What did you do before Department of Corrections
23 when you went there in 1994?

24 A. I was in private practice in Carlsbad,
25 California.

1 Q. As a dentist?

2 A. Yes.

3 Q. How long were you in private practice in
4 Carlsbad, California as a practicing dentist?

5 A. Approximately thirteen years.

6 Q. Thirteen years straight in Carlsbad as a private
7 practicing dentist?

8 A. Yes.

9 Q. Okay. Were you married to Adrienne back then?

10 A. I was, yes.

11 Q. So in 1994, based on your birth date, you were
12 probably around forty-one years old; is that correct?

13 A. Approximately.

14 Q. What made you decide to stop practicing in the
15 private sector as a dentist and go to work for the
16 Department of Corrections in 1994?

17 A. I was deployed for close to a year.

18 Q. You were deployed through the army reserves?

19 A. Yes.

20 Q. Deployed where?

21 A. To Tacoma, Washington to get soldiers ready for
22 deploying to front lines.

23 Q. In 1994 would that have been in Iraq or the
24 middle east?

25 A. Yes.

1 Q. What does that have to do with you deciding to
2 go to work for the Department of Corrections?

3 A. Because I came back and my practice was in
4 shambles.

5 Q. How so?

6 A. I had people running the office basically didn't
7 really care about it so it was really to the point that
8 I lost a lot of money.

9 Q. Okay. How long were you deployed through the
10 reserves in Tacoma, Washington in 1994 when your private
11 practice went downhill in your absence?

12 A. Close to a year.

13 Q. Because of your absence?

14 A. Yes.

15 Q. When did you come back from deployment in
16 Tacoma, Washington back to California?

17 A. I don't remember the dates.

18 Q. Well, was it in 1994 or 1995?

19 A. I'm not sure.

20 Q. Of all the selections of career choices you
21 could have made after that to close down your private
22 practice in Carlsbad and do something else, what brought
23 you to looking into the Department of Corrections?

24 A. I had a friend who I was an examiner for the
25 dental board in California that said I was working with

1 different institutions with dental students because I
2 came out teaching. I opened this school and they asked
3 me --

4 **Q. What school?**

5 A. Oral Roberts University.

6 **Q. When you say opened, what do you mean?**

7 A. I helped open, help get it accredited.

8 **Q. You mean the dental program at Oral Roberts?**

9 A. Yes.

10 **Q. Oral Roberts was in Oklahoma or Utah?**

11 A. Tulsa, Oklahoma.

12 **Q. Okay. So you helped open a dental program at**
13 **Oral Roberts University?**

14 A. Yes.

15 **Q. What year was that?**

16 A. 1998.

17 **Q. What does that have to do with you ultimately in**
18 **1994 or 1995 deciding to go work for the California**
19 **Department of Corrections?**

20 A. It didn't.

21 **Q. Okay.**

22 A. They closed because the City of Faith, the
23 hospital, they tried to combine prayer with medicine.

24 **Q. You mean at Oral Roberts?**

25 A. Yes. And they sucked all the money from the

1 graduate programs.

2 Q. But again, we were talking about why in 1994 or
3 1995 when you came back from deployment in Tacoma,
4 Washington and saw that your private practice had gone
5 downhill so that you had to close it down, what led you
6 to going to -- of all the options you could have had,
7 going to the Department of Corrections in California?

8 A. I was on the board examiner's giving examination
9 in the state of California, and one of the people worked
10 for the Department of Corrections introduced me to the
11 job.

12 Q. Okay. So when did you actually apply to become
13 employed by the Department of Corrections?

14 A. Probably in 1993 or 1994, I assume.

15 Q. And when you first hired they sent you to
16 Ironwood State Prison?

17 A. Well, that's the one I applied to.

18 Q. Is that where you first went to, Ironwood?

19 A. Yes.

20 Q. Where is Ironwood?

21 A. Blythe, California.

22 Q. What was your first job description or job title
23 with the Department of Corrections?

24 A. Chief dentist.

25 Q. Did you move there to Blythe?

- 1 A. Yes.
- 2 Q. Were you married to Adrienne back then?
- 3 A. Might have been separated.
- 4 Q. Okay. But you left Carlsbad and you moved to
5 Blythe, California some time in 1994 to work at Ironwood
6 State Prison as a chief dentist?
- 7 A. Yes.
- 8 Q. And back then was the chief dentist more of a
9 clinical job duty or more administrative?
- 10 A. I did both.
- 11 Q. How long were you at Ironwood State Prison as
12 the chief dentist before you transferred or left or were
13 promoted?
- 14 A. Four and a half years. Four to five years.
- 15 Q. Who was your supervising manager during those
16 four and half or five years?
- 17 A. Dr. John Stiles, S-t-i-l-e-s.
- 18 Q. What was Dr. Stiles' job title or job position
19 with the Department of Corrections when he was your
20 managing supervisor?
- 21 A. He was the chief medical officer health care
22 manager.
- 23 Q. And that was at Ironwood State Prison?
- 24 A. Yes.
- 25 Q. At that time did they have a dental division or

1 dental department when you first went there in 1994 or
2 were you the one that opened it up?

3 A. I was the one that opened it up.

4 Q. Do you know if Dr. Stiles is still around?

5 A. I just know he retired.

6 Q. About when did he retire?

7 A. I have no idea.

8 Q. Did you stay the whole four and a half years
9 there at Ironwood State Prison as the chief dentist?

10 A. No.

11 Q. Where did I get the four and a half years from?

12 A. They moved me back and forth paying for my
13 travel to Sacramento back and forth because they were in
14 the midst of growing.

15 Q. Who is they?

16 A. The Department of Corrections. At that time
17 there were only sixteen or seventeen prisons. Now we
18 have thirty-four. They were growing so fast.

19 Q. Besides opening up the dental program or
20 department at Ironwood State Prison they were also
21 bringing you back to Sacramento in some type of
22 administrative capacity?

23 A. To provide insight how to open the other prison.

24 Q. For that four and a half years how many times
25 did you go back and forth between Sacramento and

1 Ironwood?

2 A. I don't remember. Quite a bit.

3 Q. When they would bring you to Sacramento, how
4 long would you usually stay there on average?

5 A. A week.

6 Q. But you still kept your position during that
7 four and a half years as the chief dentist for the
8 dental program at Ironwood?

9 A. Yes.

10 Q. Did you have any physical problems or injuries,
11 any kind of disability problems while you were the chief
12 dentist at Ironwood State Prison for that four and a
13 half years?

14 A. No.

15 Q. How about any other kind of personnel problems
16 while you were at Ironwood State Prison for that four
17 and a half years? Did you have any problems with your
18 supervisors where they were taking adverse actions
19 against you? Or were you having any problems with any
20 of your people that you supervised where you were taking
21 adverse actions against them during that four and a half
22 years?

23 A. No, not that I know of.

24 MR. TAYLOR: Okay. You know what, we are at just
25 about noon here. I think this might be a good time to

1 break because we're going to start getting into all the
2 employment stuff. And also the EEOC investigations and
3 your transfer and all that. That's going to take a
4 large part of the whole deposition process. So I think
5 we should probably just break here for now.

6 MR. COHEN: Okay.

7 BY MR. TAYLOR:

8 **Q. Is that okay with you Dr. Soohoo?**

9 A. Yes.

10 **Q. So what we're going to try to do is resume this**
11 **within the next six weeks, if possible.**

12 MR. COHEN: Yes. You will have your secretary
13 contact my secretary to set a convenient date.

14 Do you think because of the matters you say you
15 want to cover we might need a full day?

16 MR. TAYLOR: We might need at least three or four
17 hours.

18 MR. COHEN: Okay. So that looks like a full day
19 really because you might do a couple hours in the
20 morning and a couple hours in the afternoon.

21 MR. TAYLOR: Yeah.

22 MR. COHEN: Okay. So that might be a good thing.

23 MR. TAYLOR: We have agreed through previous
24 conversation before we started the deposition regarding
25 the subject matter that we're here to discuss as far as

1 the work history, the claims history, medical history,
2 and the EEOC matter that is ongoing, that this
3 deposition could not be done in one session, that we
4 would get as much as we could today in a few hours and
5 then reconvene as soon as possible, maybe within the
6 next month to six weeks.

7 So we have agreed now, Mr. Cohen and Dr. Soohoo,
8 to suspend the deposition for now, go ahead and get a
9 volume one transcript prepared, and that our offices
10 will mutually discuss rescheduling this deposition with
11 the eye towards getting it done within the next month to
12 six weeks.

13 The deposition transcript will at this time not
14 be sent to Dr. Soohoo because we're not finished with it
15 yet. We would rather have him read and sign it when
16 we're completely finished with all volumes.

17 Is that agreed upon?

18 MR. COHEN: Yes. We're just going to do one
19 deposition transcript?

20 MR. TAYLOR: For my own reporting purposes
21 internally, I would like to have the transcript done, a
22 Volume 1 now. But that will not be completed yet until
23 we've finished the whole deposition. So at that point
24 is when we'll close the record and have him review it
25 and sign it.

1 MR. COHEN: Well, maybe you just have her
2 complete it as far as it goes, email it to you, and then
3 just hold it and don't do hard copies until everything
4 is complete.

5 MR. TAYLOR: Correct. But we'll call it Volume
6 1.

7 THE WITNESS: Are we going to have two smaller
8 sessions?

9 MR. TAYLOR: Let's go off the record.

10 (Discussion held off the record.)

11 MR. TAYLOR: Okay. So Phil has looked at his
12 calendar and we have agreed to try to reconvene this
13 deposition and finish it on Friday, February 21st.

14 MR. COHEN: Yeah. Let me just check with Donna
15 as long as you're here to see if that works.

16 MR. TAYLOR: Okay.

17 (Deposition concluded at 12:06 p.m.)

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1 STATE OF CALIFORNIA)
2)
3 COUNTY OF SAN DIEGO)
4

5 I, Sabine M. Becker, a Certified Shorthand
6 Reporter, do hereby certify:

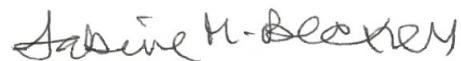
7 that prior to being examined, the witness in
8 the foregoing proceedings was by me duly sworn to
9 testify to the truth, the whole truth, and nothing but
10 the truth;

11 That said proceedings were taken before me at
12 the time and place therein set forth and were taken down
13 by me in shorthand and thereafter transcribed into
14 typewriting under my direction and supervision;

15 I further certify that I am neither counsel
16 for, nor related to, any party to said proceedings, nor
17 in any way interested in the outcome thereof.

18 In witness whereof, I have hereunto subscribed
19 my name.

20 Dated: February 14, 2020

21 
22 _____

23 SABINE M. BECKER

24 CSR NO. 11347

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DECLARATION UNDER PENALTY OF PERJURY

Case Name: Soohoo vs. State of California

Date of Deposition: 01/31/2020

Job No.: 10063411

I, GEORGE SOOHOO, hereby certify
under penalty of perjury under the laws of the State of
_____ that the foregoing is true and correct.

Executed this _____ day of
_____, 2020, at _____.

GEORGE SOOHOO

NOTARIZATION (If Required)

State of _____

County of _____

Subscribed and sworn to (or affirmed) before me on
this _____ day of _____, 20__,

by _____, proved to me on the
basis of satisfactory evidence to be the person
who appeared before me.

Signature: _____ (Seal)

1 DEPOSITION ERRATA SHEET

2 Case Name: Soohoo vs. State of California
3 Name of Witness: George Soohoo
4 Date of Deposition: 01/31/2020
5 Job No.: 10063411
6 Reason Codes: 1. To clarify the record.
7 2. To conform to the facts.
8 3. To correct transcription errors.

9 Page _____ Line _____ Reason _____
10 From _____ to _____

11 Page _____ Line _____ Reason _____
12 From _____ to _____

13 Page _____ Line _____ Reason _____
14 From _____ to _____

15 Page _____ Line _____ Reason _____
16 From _____ to _____

17 Page _____ Line _____ Reason _____
18 From _____ to _____

19 Page _____ Line _____ Reason _____
20 From _____ to _____

21 Page _____ Line _____ Reason _____
22 From _____ to _____

23 Page _____ Line _____ Reason _____
24 From _____ to _____

25 Page _____ Line _____ Reason _____
26 From _____ to _____

1 DEPOSITION ERRATA SHEET

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7 From _____ to _____

8 Page _____ Line _____ Reason _____

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12 Page _____ Line _____ Reason _____

13 From _____ to _____

14 Page _____ Line _____ Reason _____

15 From _____ to _____

16 Page _____ Line _____ Reason _____

17 From _____ to _____

18 Page _____ Line _____ Reason _____

19 From _____ to _____

20 Page _____ Line _____ Reason _____

21 From _____ to _____

22 _____ Subject to the above changes, I certify that the
transcript is true and correct

23 _____ No changes have been made. I certify that the
transcript is true and correct.

24

25 _____
GEORGE SOOHOO

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