

SISK

VS.

ROCKY MOUNTAIN PLANNED PARENTHOOD

Deposition

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1 A No particular reason.

2 Q Could you easily just switch to some
3 other field of medicine?

4 A Yes.

5 Q Okay. When you began at Planned
6 Parenthood did you have any training?

7 A No.

8 Q What was your role there?

9 A Was a health center assistant.

10 Q And what does that mean?

11 A It means a lot of things. I'm not sure
12 what you're asking me.

13 Q I'm telling -- I'm asking you to tell me
14 all the "lot of things" it means. What does it mean
15 to be that person in that company?

16 MR. RAMEY: And object to form.

17 Go ahead and answer, if you can.

18 A Are you asking me what we did?

19 Q (BY MS. KLEIN) I'm asking you what your
20 role was at Planned Parenthood.

21 A We did --

22 Q You or "we"? What was your role?

23 A Well, health center assistants in
24 general.

25 Q And what does that mean?

1 this page?

2 A I don't remember, but it looks like all
3 of it.

4 Q This whole page was filled out by you?

5 A It looks like that.

6 Q Okay. Other than just looking at this
7 page, do you remember anything about the
8 circumstances surrounding this page?

9 A No.

10 Q Any conversations about this page with my
11 client?

12 A Not that I remember.

13 Q Page 17. What's your -- what writing is
14 yours on this page?

15 A The signature, where it says, "Pt error"
16 and my initial.

17 Q Okay.

18 A Likely the circle.

19 Q Uh-huh.

20 A My signature and the date.

21 Q Anything else?

22 A It looks like I wrote "Zamniak." It
23 looks like my handwriting and the client number.

24 Q Okay. Do you remember anything about the
25 conversations with regard to filling out this page?

1 A I do not.

2 Q Page 18, what is your handwriting?

3 A The bottom line is mine.

4 Q Okay.

5 A Staff signature, Date, Hemoglobin,
6 Rh factor, everything above that.

7 Q Anything else?

8 A No.

9 Q Do you remember anything about filling
10 out this page?

11 A No.

12 Q Okay. Page 22. What's your handwriting?

13 A Everything above my signature.

14 Q Okay.

15 A And the very bottom line.

16 Q Do you have any independent recollection
17 of any conversations about this page?

18 A No.

19 Q If I asked you a hundred questions about
20 what happened, would the answer to the hundred
21 questions be, I don't remember --

22 A I don't know.

23 Q -- with regard to this page?

24 A I don't know.

25 Q And same questions with respect to

1 Page 33.

2 A Page 33?

3 Q Yes, ma'am.

4 A That's all my handwriting.

5 Q The whole page is your handwriting?

6 A Yeah.

7 Q Do you remember independently filling out
8 this page?

9 A No.

10 Q Okay. What kind of training did you have
11 from Planned Parenthood to assist you in dealing with
12 minors?

13 A I don't remember. I don't remember.

14 Q Did you have any?

15 A I believe so.

16 Q What was it like?

17 A I don't remember.

18 Q Have we exhausted your memory about what
19 you would testify about your training at Planned
20 Parenthood?

21 A About what I remember.

22 Q Okay. Do you remember sitting in a
23 classroom?

24 A In a room, not a classroom.

25 Q Okay. Where was the room?

1 A Up in the building.

2 Q What building?

3 A The Stapleton building.

4 Q Okay. Do you remember how long your
5 training was?

6 A About a week, I think.

7 Q Okay. Do you remember what kind of
8 curriculum there was?

9 A No.

10 Q Was it on computers?

11 A No.

12 Q Was it a lecture?

13 A Kind of.

14 Q Tell me what you remember.

15 A There was some role-playing instances.

16 Q Okay.

17 A Different skills. You know, learning to
18 do injections. We practiced phlebotomy on straws.
19 Some slide shows, maybe.

20 Q Okay.

21 A I really don't remember.

22 Q Okay. Is that all you want to say?

23 MR. RAMEY: Objection to the form of the
24 question.

25 Q (BY MS. KLEIN) You can answer.

1 A That's all I remember.

2 Q Is that all you want to say?

3 MR. RAMEY: Objection to the form.

4 A That's all I remember.

5 Q (BY MS. KLEIN) Is the answer to my
6 question yes, that's all you're going to say today
7 about that?

8 MR. RAMEY: I'm going to object to form
9 for that as well.

10 A I'm not clear on what you're asking me.

11 Q (BY MS. KLEIN) I'm asking you, is there
12 anything else that you would like to say on that
13 topic?

14 MR. RAMEY: Objection to form of the
15 question.

16 A I'm answering your questions, but I'm not
17 sure what you're asking me.

18 Q (BY MS. KLEIN) I'm asking you, is that
19 all you have to say --

20 MR. RAMEY: Objection to form.

21 Q (BY MS. KLEIN) -- on that topic?

22 A That's all that I remember regarding the
23 question you asked me.

24 Q And therefore, that is -- so is that all
25 you have to say?

1 her age, have more attention?

2 MR. RAMEY: Objection to form of the
3 question.

4 A I don't remember how I felt.

5 Q (BY MS. KLEIN) In dealing with
6 13-year-old girls who are pregnant overall, did
7 you -- do you feel badly for those girls?

8 A No.

9 Q Is there anything you feel that you could
10 have done better to take care of my client?

11 A No.

12 Q Do you feel that there's anything that
13 Planned Parenthood could do better to take care of
14 minors who are being raped?

15 MR. RAMEY: Objection to the form of the
16 question.

17 A I don't know.

18 Q (BY MS. KLEIN) Do you have any
19 suggestions?

20 MR. RAMEY: Objection to form of the
21 question.

22 A No.

23 Q (BY MS. KLEIN) How many 13-year-old
24 girls did you help take care of when you were at
25 Planned Parenthood?