

DEPOSITION EXCERPTS: DR. SHERMAN CROUP

Dr. Sherman Croup's deposition was taken by defendant Hard's attorney on October 20, 20XX+1. Present at the deposition were plaintiffs' attorney; attorneys representing Davola, Apple and Donaldson pursuant to Davola's insurance; Davola's personal attorney; Hard's insurance company attorney; and Hard's personal attorney.

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- 1 Q: Have you ever had your deposition taken before?
2 A: No.
3 Q: Let me describe briefly what is going to take place. My name is Jane
4 Green, and I am one of the attorneys representing Ed. Hard, a defendant in
5 the Summers family action. I am going to ask you some questions about
6 Deborah Summers. All of my questions, your answers, and all the
7 attorneys' comments will be taken down word-for-word by the court
8 reporter. At a later date, all of that will be transcribed in a booklet form
9 which will be referred to as your depositions. Do you understand that?
10 A: Yes.
11 Q: You have been placed under oath so that everything you say will be under
12 penalty of perjury and your answers will have the same force and effect as
13 if you were in a court of law. Is that clear to you?
14 A: Yes.
15 Q: If any of my questions are unclear, Dr. Croup, or if you do not understand
16 any of my questions for any reason, please tell me, so that you will not be
17 placed in the position of answering questions that you do not understand.
18 Is that agreed?
19 A: Yes.

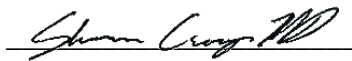
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- 1 Q: Please describe your personal background and education.
2 A: I am 45 years old. I am married and have one daughter, age 18. I have
3 practiced at the clinic for nine years. In addition to my medical duties, I
4 have had seven years experience as a family counselor while at the clinic.
5 I have counseled on a regular basis at the clinic for the past three years.
6 I especially enjoy counseling since I believe the family unit must be
7 fostered, encouraged, and nourished especially in this era that we live in.
8 Although not emphatic, I would rather not prescribe drugs when physical
9 or emotional problems can be remedied through other methods.
10 As to my education and employment, please refer to my Curriculum Vitae.
11 Q: Please describe your relationship and professional experience with Ms.
12 Summers.
13 A: On October 3, 20XX, Ms. Summers visited me at the Neva County
14 Medical Services Clinic. Ms. Summers is not a regular patient at the Neva
15 County Clinic. This is the first time I saw her. It is not unusual to have
16 patients come to the clinic on a one-time basis for prescription refills. Ms.
17 Summers came to me to obtain a refill of her Valium prescription,
18 explaining that she had fallen to pieces and was numb ever since her
19 husband, Bruno, had been shot. She said that another doctor had told her

20 that she was in shock or something.
21 After examining Ms. Summers and interviewing her, I decided against
22 prescribing Valium. I diagnosed Ms. Summers as a mild hysteric. In my
23 examination, which

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1 lasted 15 minutes, she exhibited hysteric tendencies and hysteria-related
2 physical trauma. In my opinion, Ms. Summers' physical/emotional
3 trauma would not be mitigated effectively by Valium. Ms. Summers'
4 agitated condition is not the product of a short-term phenomenon, but
5 rather, part of her personality type. In other words, Ms. Summers would
6 be likely to react adversely the same way given any highly stressful
7 situation.
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Sherman Croup, M.D.