

1 think so, but my memory is not the best sometimes. I
2 don't think I have, Mary.

3 Q. I'm going to present to you a hypothetical
4 situation and then I'm going to ask your expert
5 opinion.

6 You're presented with a bat that's crowning
7 and may need an episiotomy but you aren't there to do
8 it. Now, you have your choice of a vet who has over
9 30 years of experience, a vet who trained Amanda
10 Lollar, and a full, sterile surgical suite with
11 assistants, with drugs, and with machines.

12 Who would you prefer to do the episiotomy
13 on this crowning bat: Would you prefer to have
14 the -- the vet who trained Amanda Lollar who has over
15 30 years' experience who has a full veterinary clinic
16 with backup and machinery and drugs, or would you
17 prefer to have Amanda Lollar do the episiotomy in the
18 rehab room?

19 A. With the training vets receive on bats, in
20 general, and their level of numbers of cases, I would
21 prefer Amanda Lollar did it.

22 Q. So even though there was a vet right there
23 who has more experience than Amanda Lollar, who
24 trained Amanda Lollar, who has a full clinic, you
25 would rather have Amanda Lollar who is not a vet, who

1 is not a vet technician, who did not go to college,
2 who did not graduate from high school, who didn't get
3 past the tenth grade, you would rather have her
4 perform an episiotomy than a licensed vet?

5 A. There is no such person that you're
6 describing, so in this instance, regardless of what
7 you said to me, I would prefer Amanda Lollar. I
8 would drive my bat to Texas to have her treat it.

9 Q. Let me rephrase this. Do you know who
10 Dr. Tad Jarrett is?

11 A. No, ma'am, I do not.

12 Q. Dr. Tad Jarrett is a veterinarian in
13 Mineral Wells, Texas. He is the one who trained
14 Amanda Lollar on how to care for bats and how to do
15 procedures. He has over 30 years of experience. His
16 hospital is located five or six blocks away and he
17 was available at his hospital the day that the bat
18 needing an episiotomy in 2010.

19 In a perfect world, if you would have your
20 choice of Dr. Tad Jarrett to perform this episiotomy
21 or Amanda Lollar in her rehab room, which would you
22 choose?

23 A. Amanda Lollar. She's had more experience
24 than he has in numbers which gives her more judgment.
25 It takes you 13 years to train a regular board

1 certified medical surgeon and it takes you ten years
2 to train him when not to do something because he's
3 had experience; he will know that. In her case,
4 Amanda has had more experience by numbers so her
5 choices that she makes will be experientially better.

6 When I came out of veterinary school, I had
7 nowhere near the experience I do after 30 years. My
8 level of care at that point was to run and read a
9 book to try and remember what they taught me in five
10 years, crammed into what should have been 20 years'
11 experience. So I am convinced through my experience
12 that I want someone that's had numbers and years
13 behind them.

14 Q. In a perfect world, what if you had two
15 individuals, they both have the same amount of
16 experience with bats but one is a licensed
17 veterinarian and the other is not; who would you
18 choose in that situation?

19 A. I can't answer that question. It's too off
20 the wall.

21 Q. So besides Amanda Lollar and the person at
22 the zoo, have you received any other training in
23 proper bat care?

24 A. No.

25 Q. So would you say that Amanda Lollar is --