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IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF IOWA  
WESTERN DIVISION

KALI MYERS, an individual, )  
 )  
Plaintiff, )  
 )  
v. ) No. 5:16-cv-04107-LRR  
 )  
CITY OF SIOUX CITY, IOWA; )  
ROBERT PADMORE, in his )  
official capacity; and CINDY )  
RARRAT, in her official )  
capacity, )  
 )  
Defendants. )  
\_\_\_\_\_ )

DEPOSITION OF: AMY MARDER, V.M.D.

TAKEN BY: DEFENDANTS

REPORTED BY: CATHERINE BURNS  
Boston Court Reporters

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DATE: January 29, 2018  
Commencing at 10:24 a.m.

LOCATION: 46 Madison Avenue  
Cambridge, Massachusetts 02140

APPEARANCES: JUSTIN VONDRAK, ESQUIRE  
Assistant City Attorney  
405 6th Street, Suite 511  
P.O. Box 447  
Sioux City, Iowa 51102  
Appearing on behalf of  
Defendants

GENE SUMMERLIN, ESQUIRE  
Husch Blackwell  
13330 California Street, Suite 200  
Omaha, Nebraska 68154  
Appearing on behalf of  
Plaintiff

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DEPOSITION OF: Amy Marder, V.M.D.  
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Witness	Direct	Cross	Redirect	Recross
Amy Marder	5	58		

(Vondrak)(Summerlin)

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1 THEREUPON,  
2 THE REPORTER: Here begins the deposition in the  
3 matter of Kali Myers, an individual, v. City of Sioux City,  
4 Iowa; Robert Padmore, in his official capacity; and Cindy  
5 Rarrat, in her official capacity, in the United States  
6 District Court, Northern District of Iowa, Western  
7 Division, Case Number 5:16-cv-04107-LRR.  
8 Today's date is January 29, 2018. The time is  
9 10:24 a.m. The court reporter today is Cathy Burns with  
10 Boston Court Reporters. This deposition is being taken at  
11 46 Madison Avenue, Cambridge, Massachusetts 02140, on  
12 behalf of the defendants.  
13 Counsel, would you just state your appearances,  
14 please?  
15 MR. SUMMERLIN: Yes, Gene Summerlin on behalf of  
16 the plaintiffs.  
17 THE REPORTER: Counsel, would you state your  
18 appearance?  
19 MR. VONDRAK: Justin Vondrak on behalf of all the  
20 defendants.  
21 THE REPORTER: All right. Dr. Marder, would you  
22 raise your right hand?  
23 THE DEPONENT: Mm-hm.  
24 THE REPORTER: All right. Please proceed.  
25 Thanks.

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1 MR. SUMMERLIN: Justin, are you there?  
 2 MR. VONDRAK: Yes, I am. Sorry. I'm having a  
 3 tough time hearing the court reporter.  
 4 MR. SUMMERLIN: Oh, okay. So she -- the witness  
 5 is sworn in, and you can proceed.  
 6 THE REPORTER: Yeah.  
 7 MR. VONDRAK: Okay. Thank you.  
 8 AMY MARDER  
 9 was adduced as the deponent herein, and being first duly  
 10 sworn on oath was questioned and stated as follows:  
 11 DIRECT EXAMINATION  
 12 BY MR. VONDRAK:  
 13 Q Good morning, Amy. How are you? My name is  
 14 Justin Vondrak.  
 15 A Hello, Justin.  
 16 Q Have you ever had your deposition taken before?  
 17 A Yes. Not on this case, no, not on this case. On  
 18 other cases, yes.  
 19 Q And can you tell me a little bit about those  
 20 other cases?  
 21 A When I was at the Animal Rescue League of Boston,  
 22 I was their behavioral veterinarian. A cat attacked a  
 23 little boy in one of the cat rooms, and -- I wouldn't say  
 24 attack, he jumped on his head -- and I did a deposition in  
 25 support of the Animal Rescue League of Boston.

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1 Q Okay. Thank you. And so you know a little bit  
 2 about depositions then, correct?  
 3 A I do.  
 4 Q Good. Any physical, emotional, or mental  
 5 conditions that you're experiencing currently that would  
 6 affect your ability to answer questions truthfully?  
 7 A No.  
 8 Q Are you under the influence of any medication or  
 9 alcohol that would affect your ability?  
 10 A No.  
 11 Q Okay. Just some groundwork, and especially since  
 12 this is a phone deposition, we will need audible "yes's"  
 13 and "no's" and speaking answers, so to speak, so that,  
 14 number one, I can hear you, and number two, the court  
 15 reporter can get it all translated. Does that make sense?  
 16 A Yes.  
 17 Q Okay. Amy, tell me a little bit about your  
 18 educational background starting with secondary education.  
 19 A I went to Jamaica High School in New York City  
 20 for high school. I then went to the University of  
 21 Pennsylvania. I got my bachelor of arts in biology and  
 22 with a minor in animal behavior. And then I worked for a  
 23 couple of years as a writer for the Academy of Natural  
 24 Sciences in Philadelphia as an exhibits writer. One of the  
 25 exhibits that I wrote was on animal behavior. Then I went

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1 to veterinarian school at the University of Pennsylvania  
 2 and graduated from there. Then I did an internship in --  
 3 at Grand Avenue Pet Hospital in California for a year. And  
 4 then I was in practice for four years. And then I did a  
 5 residency in clinical animal behavior at the University of  
 6 Pennsylvania for two years. That's my education --  
 7 Q Thank you.  
 8 A -- formal education.  
 9 Q Absolutely. And so when you were in practice for  
 10 the four years, tell me a little bit about your practice  
 11 there.  
 12 A Well, at that time -- I've been in practice since  
 13 then, since my residency --  
 14 Q Sure.  
 15 A -- but prior to my residency, I was in private  
 16 practice -- do you want to know the places I was at? It  
 17 was a general private practice.  
 18 Q Just the type of work you were doing.  
 19 A Medicine and surgery. So I did have a special  
 20 interest in behavior, so I did a lot of work -- not a lot  
 21 of work, some work, with dog trainers so I was educated in  
 22 dog training.  
 23 Q Okay. I want to touch base on that a little bit.  
 24 When you're in private practice -- or when you were in  
 25 medicine and surgery, what type of animals were you working

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1 on?  
 2 A Dogs and cats.  
 3 Q No large animals?  
 4 A No -- I had a special interest in horses. And so  
 5 I went out on calls with an equine veterinarian because of  
 6 my special interest, but not as my patients.  
 7 Q Okay. What type of surgeries did you typically  
 8 perform?  
 9 A Spays and neuters.  
 10 Q Just spays and neuters? No --  
 11 A Well, injuries.  
 12 Q -- or anything like that?  
 13 A Injuries, dog bite injuries. We saw a lot of, in  
 14 Southern California, we saw a lot of foxtails that we had  
 15 to remove from bodies. And also dogs get what's called  
 16 oral hematomas, so I stitched up ears from oral hematomas.  
 17 So the primary surgeries I did were injuries and neutering,  
 18 spays and neutering, so.  
 19 Q Sure.  
 20 A Yeah. And did you ask about medical problems or  
 21 just surgical problems?  
 22 Q No, just surgical.  
 23 A Okay. Mm-hm.  
 24 Q So when -- strike that. I want to shift to your  
 25 work with the dog trainers during that time. Tell me a

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1 little bit about what that type of work entailed.  
 2 A I would say I befriended a dog trainer that was  
 3 trying to change the way people, in general, trained dogs,  
 4 from the negative techniques using choke chains and pinch  
 5 collars and shock, to the positive techniques using food.  
 6 And this was -- the program was the Ethical Treatment of  
 7 Dog Training, or something. It was Ethical Dog Training.  
 8 And so I learned how to train dogs using positive  
 9 techniques rather than the negative techniques.  
 10 Q Okay. What was the name of the dog trainer?  
 11 A Sue Myles.  
 12 Q I'm sorry?  
 13 A Sue Myles, M-y-l-e-s.  
 14 Q And spell the first name, please.  
 15 A Sue, S-u-e.  
 16 Q Okay. That's what I thought.  
 17 A Yeah.  
 18 Q What types of dogs went through training at that  
 19 time?  
 20 A A variety.  
 21 Q Hunting dogs, sporting dogs, field trial dogs?  
 22 A Dogs.  
 23 Q I'm sorry?  
 24 A Just dogs.  
 25 Q Dogs.

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1 A Owned dogs. So I also -- during that time, I  
 2 also volunteered to be on the board of the Orange County  
 3 Shelter, so personally -- so I was working shelter dogs,  
 4 she was working with owned dogs. So these are dogs that  
 5 people owned, and a good variety, all types of dogs.  
 6 Q So if I had a house dog, and I was having  
 7 problems with obedience or something like that, I could  
 8 take this dog to Sue, and she would help me with that?  
 9 A No, not problems, uh-uh. Not problems, just root  
 10 -- sorry.  
 11 THE REPORTER: Just wait for him to finish the  
 12 question.  
 13 THE DEPONENT: Sorry. Okay. Okay. Sorry to  
 14 interrupt you.  
 15 THE REPORTER: It's okay.  
 16 THE DEPONENT: These are people that routinely go  
 17 to dog training classes from puppyhood. A number had  
 18 already started puppy classes, so Sue continued, followed  
 19 in Dunbar's footsteps. She was good friends with him, and  
 20 so she did puppy classes. These were not puppies with  
 21 problems; these were just puppies. And then her dog  
 22 training classes that succeeded the puppy classes were for  
 23 dogs just to be trained, not dogs with problems.  
 24 BY MR. VONDRAK:  
 25 Q I see. Thank you.

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1 A She also saw dogs where people had problems such  
 2 as a dog that was urinating or defecating in the house, a  
 3 dog that was biting people or -- however, I did think he  
 4 was deaf. But primarily, she held dog training classes for  
 5 dogs without problems.  
 6 Q Okay. And your role with her would have been  
 7 what? You said you befriended Sue, but what was your role  
 8 in this training as an observer?  
 9 A I had a puppy, and I took my puppy to her  
 10 training classes, and then I was an observer.  
 11 Q What type of puppy did you have?  
 12 A An Australian terrier puppy.  
 13 Q You referenced you were on the board at the  
 14 Orange County Shelter. Tell me a little bit about that  
 15 shelter.  
 16 A It's a very long time ago, so I don't know that I  
 17 remember --  
 18 Q Okay.  
 19 A -- what -- yeah.  
 20 Q What type of work did you do at the shelter being  
 21 on the board?  
 22 A I don't remember.  
 23 Q Did you do any behavioral work with the dogs that  
 24 you can remember?  
 25 A No, I was not trained in behavior as such,

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1 clinical behavior. I was primarily, again, as an observer,  
 2 as a learner.  
 3 Q I see. And you went back to Penn to get your  
 4 degree in clinical animal behavior. Is that correct?  
 5 A Correct.  
 6 Q And tell me a little bit about that education,  
 7 briefly, just because I don't know anything about it. Tell  
 8 me what the types of things you would study and basically  
 9 what you learned to become a clinical animal behaviorist.  
 10 A I studied domestic animal behavior in dogs, cats,  
 11 horses, cattle, sheep, goats. And then, beyond that, I  
 12 studied behaviors that people considered to be problems in  
 13 primarily dogs and cats.  
 14 And the number one problem in dogs is aggression.  
 15 The number one problem in cats, at that time, was cats  
 16 urinating and defecating inappropriately outside the litter  
 17 box.  
 18 So and we saw a number of clients who were  
 19 experiencing problems with their pets. And it was a  
 20 teaching hospital, so we taught the students when we saw  
 21 these behavior cases.  
 22 Q Thank you. I kind of want to focus on the dogs,  
 23 and I appreciate your work with cats too. But you said the  
 24 number one problem in dogs was aggression.  
 25 A Absolutely, yes.

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1 Q What -- can you give me a little bit of  
 2 background on how you came to this conclusion that that was  
 3 the number one problem?  
 4 A We counted. We counted the diagnoses of the  
 5 cases that we saw.  
 6 Q And did you ever observe one breed being more  
 7 aggressive than the other, or was it straight across the  
 8 board?  
 9 A English Springer Spaniels.  
 10 Q English Springer Spaniels were the most  
 11 aggressive that you've worked with?  
 12 A We -- there are several kinds of aggression:  
 13 there is aggression to owners, there's aggression to  
 14 strangers. We saw many English Springer Spaniels that were  
 15 presented for aggression to owners, and Cocker Spaniels.  
 16 We saw a lot of cocker --  
 17 Q And you said Cocker Spaniels?  
 18 A A lot of Cocker Spaniels.  
 19 Q Do you have any reason or rationale on why these  
 20 two breeds would be aggressive in a reoccurring nature  
 21 throughout the breed?  
 22 A Both of these breeds have been studied for the  
 23 frequency of this kind of aggression in the breed, and it  
 24 has been traced to a certain breeder in Michigan. And this  
 25 was a study that was put together by Dr. Ilana Reisner, and

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1 that's on English Springer Spaniels. The other study, old  
 2 study on red Cocker Spaniels, I believe the author is Roger  
 3 Mugford on the frequency on this kind of aggression in red  
 4 Cocker Spaniels.  
 5 Q When it was traced back to the breeder in  
 6 Michigan, was anybody able to ascertain what this breeder  
 7 was doing differently to instill this aggression in his  
 8 dogs or her dogs?  
 9 A It wasn't --  
 10 Q I'm sorry?  
 11 A I believe, and I do need to read. I was in the  
 12 middle of all these people questioning where/why English  
 13 Springer Spaniels were -- they used the word "rage  
 14 syndrome." They actually named the syndrome. And it was  
 15 traced to a couple of dogs, stud dogs that were used in  
 16 breeding. And rumor has it -- well, so that's all I can  
 17 tell you, not --  
 18 Q What was the rumor you were going to tell me?  
 19 A Oh, the rumor is that these dogs won the breed at  
 20 Westminster Dog Show so -- relatives of this breed. So  
 21 they were bred a lot with whatever they had. We didn't do  
 22 any genetic studies so I can't tell you to a point that it  
 23 was genetic, but it was -- it seemed -- we did -- all I can  
 24 tell you is that we saw a lot of English Springer Spaniels  
 25 with this trait. Right now, I am not seeing English

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1 Springer Spaniels. I used to say English Springer Spaniels  
 2 kept me in business, but not anymore, not anymore.  
 3 Q Would it be your opinion that that aggression was  
 4 bred out of them once the problem was identified?  
 5 A That would be an assumption, not -- I can't tell  
 6 you that's a truth. That would be an assumption.  
 7 Q And would it be your opinion that aggression can  
 8 be bred into dogs and passed down?  
 9 A I think that's a very complicated question. I  
 10 think that, in this case, of English Springer Spaniels, all  
 11 I can say is that we saw more English Springer Spaniels for  
 12 this kind of aggression. I can tell you we saw other  
 13 breeds for this kind of aggression too: English Springer  
 14 Spaniels, Old English sheepdogs, Lhasa Apsos, cairn  
 15 terriers. We saw more of these breeds for this kind of  
 16 aggression. We didn't see the dogs that didn't have this  
 17 kind of aggression of each breed; we saw these -- a lot of  
 18 these dogs with this kind of aggression. So the assumption  
 19 is that it was genetic. Is -- do we have any evidence of  
 20 that? No, it was just an assumption.  
 21 Q All right. But you said it was traced back to a  
 22 line of dogs that originated or were champions at the --  
 23 A No, no, no.  
 24 Q -- Westminster show, right?  
 25 A I'm going to scratch that, because that was a

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1 rumor. That is not the truth; that was a rumor, and you  
 2 know how rumors get spread.  
 3 Q Okay. So that -- so the aggression was not  
 4 traced back to the breeder and the successful dogs? That  
 5 was just a rumor?  
 6 A It was -- no, hm-mm. It was traced back to this  
 7 breeder. She bred a lot of English Springer Spaniels, a  
 8 lot, a lot, a lot of English Springer Spaniels. She was  
 9 probably the most prolific breeder of English Springer  
 10 Spaniels in the country.  
 11 Q Were you ever able to ascertain if this breeder  
 12 was treating the dogs any differently?  
 13 A No, I do not know the breeder. I know her name,  
 14 Sally Lynn.  
 15 Q I'm sorry?  
 16 A Her name is Sally Lynn. What is this from?  
 17 MR. SUMMERLIN: It's a Wikipedia.  
 18 THE DEPONENT: Oh, wow. So it's -- I would -- I  
 19 -- for me, I would need to read again Dr. Ilana Reisner's  
 20 article on Springer Spaniels --  
 21 BY MR. VONDRAK:  
 22 Q Okay.  
 23 A -- to tell you the exact -- the way she traced it  
 24 and how she traced it, and that was primarily to the  
 25 breeder and to the dogs that she used in breeding, and

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1 nothing to do with the Westminster Dog Show.  
 2 Q I see. And so your study depends under clinical  
 3 animal behavior. Did you ever work with any biting dogs?  
 4 A No, no.  
 5 Q Did you ever work with any pit bulls, American  
 6 Staffordshire terriers, Staffordshire bull terriers?  
 7 A This is a long time ago when I was at Penn, and I  
 8 would say probably, because we saw a variety of dogs, so  
 9 there was probably a few of those types of dogs that I saw.  
 10 Q Do you recall --  
 11 A I certainly saw -- I saw, when I was in private  
 12 practice, I also saw a few of those kinds of dogs in  
 13 private practice, not for behavior problems, just as  
 14 regular patients, medical and surgical patients.  
 15 Q Sure. Do you have any opinion about those breeds  
 16 specifically relating to aggression?  
 17 A What kind of aggression?  
 18 Q Human or animal.  
 19 A I see dogs as dogs, and I -- in terms of treating  
 20 them as patients, medical and surgical patients, they are  
 21 fantastic to treat. So I'm going to say no in terms of  
 22 medical and surgical patients. And as behavior clients, I  
 23 never see them, so -- I hardly ever see them. So I would  
 24 say my opinion is -- I just don't see them. I don't know.  
 25 So I think they're really easy to treat. So do they -- do

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1 I see a higher percentage of them for aggression to people?  
 2 Did you say dogs too? Do I see? I would say no, I don't.  
 3 So I see all kinds of dogs.  
 4 Q Tell me a little bit about your current  
 5 employment. Where are you currently employed?  
 6 A Currently, I am self-employed.  
 7 Q And what type of work do you do, doctor?  
 8 A I teach a course in shelter animal behavior, an  
 9 online course, at the University of Florida. I do see  
 10 behavior appointments for owned animals three days a week.  
 11 I also do a variety of consulting jobs for animal shelters.  
 12 So I think, yeah, it keeps me very busy.  
 13 Q Good. What type of consulting work do you do for  
 14 animal shelters? And if I owned an animal shelter or  
 15 operated an animal shelter, why would I contact you?  
 16 A If you had a -- if you wanted to set up a program  
 17 to make decisions on an animal's behavior in the shelter, I  
 18 don't know if -- I think that people primarily contact me  
 19 for evaluating animals in the shelter and also making  
 20 decisions on how to decide which animal should be placed up  
 21 for adoption and which should not, and also setting up  
 22 behavior departments within the shelter, because I've done  
 23 that several times.  
 24 Q What are some of the criteria for determining  
 25 whether an animal should be placed up for adoption and

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1 should not? What are some of the things you're looking  
 2 for?  
 3 A The times have changed since I started working  
 4 with shelters. We are, certainly in the Northeast, we are  
 5 very much a no-kill society. So for me, I look for humane  
 6 reasons. If an animal is very ill, and would cost a lot of  
 7 money to fix this animal, and it wouldn't be humane to keep  
 8 the animal alive, then that animal with a medical problem  
 9 would be -- an untreatable medical problem would be put to  
 10 sleep.  
 11 Treatable, we do our best to treat, and that goes  
 12 with behavioral problems as well. If a behavioral problem  
 13 is not -- is treatable, is manageable, then we try to place  
 14 that animal. If the animal is exhibiting dangerous  
 15 behavior, impulsive behavior, behavior that cannot be  
 16 controlled, therefore managed, and that animal is therefore  
 17 dangerous, that animal -- I recommend that animal be put to  
 18 sleep.  
 19 Was I clear on that? It's basically, if it's  
 20 manageable, then the animal is placed. If it is not  
 21 manageable safely, the animal -- I recommend the animal is  
 22 put to sleep. That does not mean these animals are put to  
 23 sleep, but I would recommend the animal is put to sleep.  
 24 Q Sure. How do you determine if a dangerous or  
 25 uncontrolled animal cannot be treated? What are some of --

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1 what helps you make that decision?  
 2 A I designed this evaluation over the years working  
 3 with shelters called the Match-Up II program. And within  
 4 the Match-Up II program, it is an evaluation of the animal,  
 5 and it does evaluate the animal for dog-human relationships  
 6 and dog-dog relationships.  
 7 And as -- after the evaluation is done, I put  
 8 together what I called triage points, and on the triage  
 9 points, we looked at the dangerousness of behaviors and the  
 10 controllability of the behaviors.  
 11 And the dogs got scores as to the -- I don't call  
 12 it dangerousness scores, but of the severity scores and  
 13 then we made a determination of where this animal could go.  
 14 And if the scores were really high, we had a choice of  
 15 putting the animal to sleep, transferring the animal to a  
 16 training facility, transferring the animal to a sanctuary.  
 17 And you can probably find the Match-Up II  
 18 program. It's still on. Since I left the Animal Rescue  
 19 League, I have not continued with the program. I still use  
 20 it for court cases, but because there's really nothing else  
 21 to evaluate an animal, but -- and you can look at the  
 22 triage system of -- and the decision-making system.  
 23 Q How often do you come across an animal that is  
 24 dangerous or that is untreatable that you recommend the  
 25 animal be put to sleep: 1 in 100, 10 in a 100, 1,500? Do

Page 21

1 you have --

2 A Oh, my God.

3 Q Would you have a --

4 A I would say 1 in 1,000.

5 Q One in 1,000.

6 A Yeah. One of the most recent ones was an Old

7 English sheepdog, and it was a scary dog.

8 Q What made the dog scary?

9 A Let's see. It had bitten about 20 people, not

10 light bites, not just -- like, severe bites. The dog was

11 uncontrollable. People couldn't control the dog. The dog

12 bit my assistant, as we walked into the house, on her rear

13 end, and the dog just -- they could not -- it was a very

14 scary dog.

15 Q Sure. So if a dog bit 1 person, possibly it

16 could be treated, but 20 --

17 A No, that's -- not the numbers; you look at the

18 severity of the bite too.

19 Q Sure.

20 A So.

21 Q Would it be your opinion that some breeds bite

22 just because of the nature of the breed, the ability of the

23 breed, the physical characteristics of the breed?

24 A No.

25 Q Does that --

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1 A No.

2 Q Let me finish.

3 A I'm sorry. Okay.

4 Q That a breed would have a more severe bite?

5 A No.

6 Q Would it be fair to say then --

7 A I think --

8 Q -- a Chihuahua's bite could be as severe as an

9 English sheepdog?

10 A Larger dogs deliver bigger bites. Are they

11 deeper bites? Are they -- they're bigger bites; they've

12 got bigger mouths. So you compare a Chihuahua to an Old

13 English sheepdog that have the same pressure and the same

14 situation of the bite, yeah, the Old English sheepdog's

15 bite would probably be more severe. It's a bigger dog,

16 more pressure. Or maybe -- you know, maybe that's not

17 true. Maybe it's just as much pressure but it's in a

18 smaller location with the Chihuahua. So I don't think

19 that's the right word. So it's a smaller area that the

20 Chihuahua bites. The Old English sheepdog is a larger area

21 that it bites, but it could be the same pressure.

22 Q Sure. But a larger bite probably is going to be

23 more severe than a smaller bite, right?

24 A Then I'm going to say maybe, because then you

25 have dogs that give multiple bites. So you could have a

Page 23

1 Chihuahua that bite, bite, bite, bite, bite all over the

2 hand and up the arm, and you have an Old English sheepdog

3 that just bites once and lets go. So that Chihuahua bite

4 probably is more severe than that Old English sheepdog

5 bite.

6 Q What about a breed that has the characteristics -

7 - maybe you're familiar with it, maybe you're not -- of a

8 bite-and-hold technique. Would it be your opinion that a

9 bite-and-hold technique might be a more severe bite than a

10 bite and release?

11 MR. SUMMERLIN: Hold on just a second. I'm going

12 to object on the form and foundation to the extent that --

13 I think that the way you phrased the question was that what

14 about a breed that had a bite-and-hold technique. But with

15 that, you can answer the question.

16 THE DEPONENT: I don't see dogs that bite and

17 hold. I see dogs that bite and shake. I don't see dogs

18 that bite and hold.

19 BY MR. VONDRAK:

20 Q What type of dogs do you see that bite and shake?

21 A All dogs.

22 Q Would some breeds, in your opinion, be more prone

23 to bite and shake?

24 A I don't know. I don't know, because the bite and

25 shake is part of the -- their whole continuation of how

Page 24

1 dogs, in general, kill. So you take a little terrier, they

2 might go to hold -- not hold, but -- and shake to the kill.

3 These ratting terriers, just like my dogs -- well, one of

4 them does -- but, it's just, like -- it's -- but -- and

5 dogs love to play tug-of-war, right? So the tug-of-war is

6 based on the hold and shake, right? But it becomes a game.

7 The protection dogs that hold and hold onto the person that

8 they're -- that they are going after for the police, and we

9 know that so many breeds of dogs are protection dogs.

10 Q Doctor, just as a form of clarification, when I

11 use the word "pit bull" in this deposition --

12 A Okay.

13 Q -- what I'm referring to is Sioux City's

14 definition of a pit bull. Are you familiar with Sioux City

15 ordinance?

16 A Yes.

17 Q And our definition states that, "A pit bull is

18 defined as any dog that is an American pit bull terrier,

19 American Staffordshire terrier, Staffordshire bull terrier,

20 or any dog which has the appearance and characteristics of

21 being predominantly those breeds." Have you done any work

22 specifically with pit bulls?

23 A When I was at the Animal Rescue League, I, out of

24 my own interest, I said we are calling these dogs pit

25 mixes. I say, "I wonder what's really in these dogs?"

1 So I did DNA on the dogs that we were calling pit  
2 mixes. And the -- we did use the Mars Wisdom Panel, so  
3 they didn't have pit bull, but they had American  
4 Staffordshire, and we saw a variety of breeds. And the  
5 ones that were called pit mixes, most of them did have at  
6 some level -- not parentage, and not grandparentage -- they  
7 had Am. Staff. In their background, but some of them did  
8 not, the dogs that we called pit mixes.

9 So just by looking like a dog we call a pit mix -  
10 - and these are shelter workers -- these are people that  
11 apparently know what they're -- how to identify dogs -- it  
12 wasn't the case. It wasn't the -- and it wasn't even a  
13 close case. It was -- it just -- they just looked --  
14 there's a look like it. Genetically, they weren't really  
15 what -- I had a dog that came in to see me at the Animal  
16 Rescue League that was a fluffy little mixed breed, and  
17 they had done DNA on this dog, and it had Am. Staff. in it.  
18 I have a picture of it way back. I saved a picture of it  
19 because I couldn't believe it. So it's a -- you know, it's  
20 a real puzzle.

21 Q Sure. This study you referred to, is that -- was  
22 that your work with Dr. Boyd back in 2013, "The Comparison  
23 of Visual and DNA Breed Identification of Dogs"?

24 A That is Dr. Boyd's study. I did help her with  
25 the study. I had 20 people from the Animal Rescue League

1 guess breeds. But, no, that's not the one I'm talking  
2 about. This was not -- what I did was not a published  
3 study; it was just a personal interest study, and that I  
4 just looked at the dogs we were calling pit mixes. Dr.  
5 Boyd did a much more formal study than what I did.

6 Q How was your study conducted?

7 A How was it conducted? We -- at shelters, they  
8 have this program called Chameleon, and at Chameleon they  
9 force you to pick a breed, so -- and also on the cage  
10 cards, when we were putting dogs up for adoption, it forced  
11 us to pick a breed.

12 I always -- I -- my thing was, why pick a breed?  
13 Just call these dogs -- I wanted them to be called American  
14 shelter dogs rather than pick a breed.

15 So we still had to pick a breed. So I said,  
16 okay, let's take all the dogs that we are picking a breed  
17 and calling them pit mixes and find out what's really in  
18 them.

19 So what we did, the staff would say, "These are  
20 pit mixes." And I went, "Okay. Let's take blood."

21 Now, did we do blood or saliva then? Because the  
22 original test you had to take blood, and more recently just  
23 have to take saliva. So I think, at the time, we had to  
24 take blood.

25 And so we took blood from these dogs and we found

1 out what -- by the Mars Wisdom Panel, which breed showed  
2 up, so.

3 Q And what were your results of this informal  
4 study?

5 A I can't tell you. I can't remember. I said  
6 before that most of the pit mixes had Am. Staff. distantly,  
7 like, trace, in distance background, but a few did not.  
8 But not only did they have Am. Staff in the distance, they  
9 also had -- we saw -- I remember the dog that had a Gordon  
10 setter, one that had an Old English sheepdog, one that had  
11 the Lakeland terriers, the little terriers. So there -- so  
12 it wasn't just Am. Staff; it was, like, all these other  
13 breeds that showed up, and these dogs that looked to the  
14 staff as a pit mix.

15 Q Doctor, what is your opinion of breed-specific  
16 legislation currently?

17 A I think it's ineffective, and I think that  
18 dangerous dog legislation for individual dangerous dogs,  
19 not broad, oh broad, "These dogs are bad," is more  
20 effective, logically is more effective.

21 Q Why do you think that breed-specific legislation  
22 is ineffective?

23 A I just looked at the numbers and the locations  
24 that discontinued the breed-specific legislation because it  
25 was ineffective and not worth the money to enforce it and

1 discontinued it, so.

2 Q You said you looked at the numbers. What numbers  
3 did you look at in making this determination?

4 A I'd have to go back. Certainly the Netherlands,  
5 and Spain, and so -- I'm sorry, I cannot fully answer this.

6 Q But you said you looked at the numbers. Did you  
7 look at numbers in the United States?

8 A I have.

9 Q And what numbers --

10 A Well, certainly what we had in Boston --  
11 MR. SUMMERLIN: Wait.

12 THE DEPONENT: Sorry, sorry. Okay.

13 MR. SUMMERLIN: Justin, I'm sorry. The witness  
14 started to speak while you were asking your question. If  
15 you could start over again.

16 BY MR. VONDRAK:

17 Q What specifically in the US, what numbers did you  
18 look at?

19 A I was personally involved in the breed ban in  
20 Malden, Massachusetts, and I did -- this was years ago. I  
21 looked at the numbers of how effective their breed ban was  
22 on the number of dog bites, and we determined that it was  
23 not reducing the number of dog bites, therefore it was not  
24 necessary, and we discontinued that.

25 The -- we had a muzzle order for pit bulls in the

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1 city of Boston that we looked at the number of dog bites.  
 2 We -- these are difficult numbers to retrieve, but we  
 3 decided, as a group, that we did not get the -- other than  
 4 -- we did not get the reduction of dog bites that would  
 5 have led to the continuation of the muzzle order, and the -  
 6 - certainly the discrimination against pit bulls and their  
 7 owners was getting so controversial it was easier to  
 8 eliminate the muzzle order. Not -- I'm not going to say  
 9 easier. It was wiser to eliminate the muzzle order, and we  
 10 have eliminated the muzzle order, and we have not had an  
 11 increase in dog bites.

12 Q You said you didn't get the reduction. Was there  
 13 some reduction in the dog bites?

14 A The biggest problem was the reporting of dog  
 15 bites.

16 Q Can you expand upon that, the biggest -- is there  
 17 a problem that dog bites aren't reported, or tell me a  
 18 little bit about that, please.

19 A Number one, dog bites are not reported; number  
 20 two, it's where they're reported to. In my practice, I see  
 21 many, many dog bites. Some are reported, some are reported  
 22 by the doctors, some are reported by the person that's  
 23 bitten, some are never reported. So therefore -- and I  
 24 say, great, dog bite is not reported, we don't have to  
 25 worry about it. There's a lot of those. So do I believe

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1 the dog bite statistics in Boston? No. I don't know what  
 2 they mean, so -- the reporting of the dog bites.

3 And this has been -- I'm sorry my memory is not  
 4 fantastic, but I worked with the animal control officer,  
 5 the head animal control officer in Boston, and drilled him  
 6 as to you need to keep records of the dog bites, I need to  
 7 know if this muzzle order is making any effect, and he  
 8 couldn't give me the numbers.

9 Q But, Doctor, didn't you say you used these  
 10 numbers in assuming that it wasn't effective?

11 A Oh, in Boston? No. Other places, other places  
 12 that I read.

13 Q And what made those places different than Boston  
 14 in terms of numbers?

15 A Let's see that question. What makes those --  
 16 maybe they're the same, maybe they're the same.

17 Q So it would be your opinion that you can't base -  
 18 - strike that. Would it be your opinion then that you can  
 19 never trust any of the numbers concerning dog bites?

20 A I don't know. I just read a book you might want  
 21 to take a look at. A new textbook just came out called Dog  
 22 Bites: A Multidisciplinary Perspective, and one of the  
 23 conclusions of this book -- let's see. Okay. The -- if  
 24 you could just let me find the statement, it's a really  
 25 good statement. Basically, this book -- where's the

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1 introduction? The conclusion is the same thing. It's  
 2 basically we don't know. Part of it we don't even know  
 3 what we don't know, so.

4 Q Right. But, Doctor, you said, when I asked you  
 5 about breed-specific bans and breed-specific legislation --

6 A Here. I'm going to read you the statement, okay?

7 Q Okay. Let me finish my question.

8 A Okay. Sorry, I'm just looking in this book.  
 9 Sorry, I'm distracted. Okay. Okay. Finish your question.

10 Q You stated, when I asked you about breed-specific  
 11 bans or breed-specific legislation, that your rationale for  
 12 the success of that legislation was based the numbers. Is  
 13 that correct?

14 A The numbers that are published.

15 Q But those numbers might not be true?

16 A Correct. Here, if I could read you the sentence,  
 17 would that be okay if I read you the sentence?

18 Q Absolutely.

19 A "One thing is clear: we actually know very little  
 20 about how to prevent dog bites effectively, although we  
 21 know a bit about some of the measures that do not work."  
 22 And one of the measures in this book that they state does  
 23 not work is breed-specific legislation.

24 Q And who is the author of this book?

25 A Editors are Daniel Mills and Carri Westgarth.

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1 Q And so is this book your rationale for why breed-  
 2 specific legislation doesn't work?

3 MR. SUMMERLIN: I'll object to the form. I think  
 4 she's already testified to other reasons why she thinks it  
 5 doesn't work, and so the question asks her to limit it to  
 6 just a single source, but you can answer if you can.

7 THE DEPONENT: This book is the first book that's  
 8 ever been written about a multidisciplinary approach to dog  
 9 bites. It takes what is known, what has been published in  
 10 the literature, and puts it in one book. This is a 400-  
 11 page book on dog bites. The very first chapter in this  
 12 book is "What is a Dog Bite," and this is a big problem.  
 13 Since we don't have a definition of a dog bite, how can we  
 14 keep numbers on dog bites?

15 BY MR. VONDRAK:

16 Q Doctor, what would be your definition of a dog  
 17 bite?

18 A My definition of a dog bite. I don't know that I  
 19 have one. If I -- if people who come into my practice, and  
 20 they bring in -- and my dog's bitten ten times, and it  
 21 could be a little puppy that is just nibbling at hands, or  
 22 it could be a dog that bites and breaks skin. So I don't  
 23 have a definition of dog bite. If I describe what a dog  
 24 did, I don't call it a dog bite. I say the dog grabbed a  
 25 hand, pierced the skin; the dog grabbed a hand, caused



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1 bruising. I don't have "dog bite," because the definition  
 2 is so variable. I describe exactly what the dog did.  
 3 Q You stated earlier that there are other ways to  
 4 reduce dog bites if you were a state rep. What would those  
 5 ways consist of?  
 6 A Keeping a dog on a leash.  
 7 Q So if the dog is on a leash, it can't bite?  
 8 A A dog on a leash is less likely to bite. And I -  
 9 - again, I don't have statistics on that. That is just why  
 10 do we have leash laws.  
 11 Q What are some of the other ways, in lieu of  
 12 breed-specific legislation, that you would recommend to  
 13 reduce dog bites?  
 14 A For individual dogs that are dangerous that will  
 15 still have a tendency to put their mouths on people when  
 16 they're on a leash, a muzzle.  
 17 Q And how would you recommend that that  
 18 determination be made? Would we have to observe every dog  
 19 and then make a determination of whether that dog at some  
 20 point will become aggressive? How would that be done?  
 21 A In other countries, they do evaluate dogs.  
 22 There's a study that came out in Dog Personality of 30,000  
 23 dogs in Sweden that they evaluated. We have, in the United  
 24 States, we have the Canine Good Citizen Test where they  
 25 evaluate many dogs in dog training classes, not for

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1 negativity and finding out if the dog will bite, but if the  
 2 dog passes the Canine Good Citizen Test, then this dog does  
 3 appear to be safe and well-socialized.  
 4 So if a dog does show tendencies of threatening  
 5 tendencies such as the dogs that I see in my private  
 6 practice, yes, I do think those dogs should have some kind  
 7 of evaluation so a management program can be put together  
 8 for that individual dog. Not every breed that comes into  
 9 my practice do I say, "Oh, you're a Rhodesian ridgeback,  
 10 hmm, you're on some breed ban someplace. And oh, I'm going  
 11 to require that you wear a muzzle, then you're not going to  
 12 bite." No, every Rhodesian ridgeback is different.  
 13 Q If a dog does bite, would it be your  
 14 recommendation that they have to be studied as well to  
 15 determine if they're going to bite in the future?  
 16 A Yes. Yes, I'd like to prevent bites. Again, we  
 17 have a definition of "bite," whatever that bite is. If  
 18 it's a puppy, a little nipping/mouthing behavior, then  
 19 there are -- then there's education that this is not a  
 20 dangerous behavior.  
 21 Q Doctor, you said you did some work with Dr. Boyd  
 22 on a visual and DNA breed identification. Can you tell me  
 23 a little bit about that work that you did with Dr. Boyd?  
 24 A I was -- I got 20 people from the Animal Rescue  
 25 League in an auditorium to view her photographs of her dogs

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1 -- I think she had 20 dogs -- for each one of these 20  
 2 people to guess the breeds they thought were in this dog.  
 3 And then I collected the papers that she gave us as  
 4 responses, and I gave them to her.  
 5 Q What is this Animal Rescue League?  
 6 A It's a private humane society in Boston.  
 7 Q And what type of work does this league do?  
 8 A Their primary goal is adopting animals out to the  
 9 public. They also have a small law enforcement department  
 10 where they retrieve animals that have been abused. They  
 11 also have a rescue department that rescues wildlife and  
 12 domesticated animals that need to be rescued such as  
 13 animals in hoarding cases, dogs that are running loose and  
 14 cannot be caught, pets -- cats that climb trees and can't  
 15 come down. So those are the primary things that the Animal  
 16 Rescue League does.  
 17 Q So would you say that -- I mean, we have an  
 18 animal control -- actually, it's called the Animal Adoption  
 19 and Rescue Center here in Sioux City, Iowa, that if a cat's  
 20 up in a tree or if there's a hoarding situation, the animal  
 21 control officers go out. This organization that you're  
 22 talking about is privately run, and so --  
 23 A They're --  
 24 Q -- it's not affiliated with a government entity?  
 25 A When they started out, they were hired by the

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1 city of Boston to be their government animal control  
 2 facility. When the city of Boston built their own animal  
 3 control facility, the Animal Rescue League went out on  
 4 their own. There are peace officers that are employed by  
 5 private rescue organizations in the city of Boston, the  
 6 Animal Rescue League and the Massachusetts Society for the  
 7 Prevention of Cruelty to Animals, and they do have law  
 8 enforcement departments. As a similar to New York City,  
 9 the ASPCA has a large humane law enforcement department.  
 10 They are not animal control officers.  
 11 Q I see.  
 12 A They do similar things, but they are not the city  
 13 animal control officers.  
 14 Q Are you aware if the Animal Rescue League has a  
 15 position on breed-specific legislation?  
 16 A Yes.  
 17 Q And what is their position?  
 18 A They are opposed to breed-specific legislation.  
 19 The state of Massachusetts rewrote their animal laws to not  
 20 allow breed-specific legislation, and that was a couple,  
 21 three years ago that that changed, so it is statewide.  
 22 Q Doctor, have you studied the severity of pit bull  
 23 bites in relation to any other breed bite?  
 24 A No. I can say, personally, I have seen very  
 25 severe bites, and I cannot remember one that came from a

1 pit bull. I have evaluated dogs involved in fatal dog  
 2 attacks -- I'm sorry, fatal, and not one of them was a pit  
 3 bull. One was a Rottweiler, one was a bullmastiff.  
 4 Q Are you aware of any fatal dog bites from pit  
 5 bulls?  
 6 A Published.  
 7 Q I'm sorry?  
 8 A Published. Newspaper reports, so that's where,  
 9 but I have not met the dogs. In the paper that I worked on  
 10 with Gary Patronek on the fatal dog attacks, I read a lot  
 11 of reports. I never met the dogs.  
 12 Q Is that the "Co-occurrence of Potentially  
 13 Preventable Factors in 256 Dog Bite-Related --  
 14 A Correct, yes.  
 15 Q -- Fatalities"?"  
 16 A Yes, yes.  
 17 Q To your knowledge, were any of those 256 dog bite  
 18 fatalities the result of pit bulls?  
 19 A Yes. I cannot tell you how many. I cannot tell  
 20 you if they were really what we're calling pit bulls. So I  
 21 think that, most logically, the answer is yes. I cannot  
 22 tell you how many.  
 23 Q Okay. Why do you think -- and if you don't know,  
 24 please tell me -- why do you think pit bulls get maybe  
 25 possibly more media attention or I'll even call it a bad

1 rap for being a dog that its bite is more vicious?  
 2 A Isn't that what the news wants to hear? Isn't  
 3 that what -- I think it's -- this is what people want to  
 4 see, this is what gives them ratings on television, you  
 5 have these sensational stories. If you say, "Oh, a Cocker  
 6 Spaniel bit a person and caused severe damage," it's not as  
 7 fun if you go, "Oh, the pit bull attacked, pit bull  
 8 attacked, the pit bull, scary, scary pit bull."  
 9 There was just a case that I was going to be  
 10 involved with, but they dropped this case, of a dog that  
 11 got loose in Amesbury, a town in northern Massachusetts.  
 12 And a woman cop grabbed the dog to retrieve the dog, and  
 13 the dog, she said, bit her on her coat. But was it a bite?  
 14 There was no piercing skin or no bruising or anything.  
 15 And then the town of Amesbury put a -- what is it  
 16 called when they told everyone to stay in their houses  
 17 because a vicious pit bull was on the run? And the dog  
 18 came home -- the dog was so frightened of what was  
 19 happening, the dog came home the next morning and was  
 20 friendly to everybody, and so this whole case was dropped.  
 21 So but they -- it was on the news, "Everybody in Amesbury  
 22 stay inside because there's a vicious pit bull on the run."  
 23 It was a big story here.  
 24 If a little Cocker Spaniel got loose and say,  
 25 "Oh, the Cocker Spaniel bit the kid down the street.

1 Everyone stay inside. This is a Cocker Spaniel that bit  
 2 the kid down the street is running loose. Be careful,"  
 3 that wouldn't have happened. People are afraid of pit  
 4 bulls.  
 5 Q Do you know why that is? Is it just because of  
 6 the media?  
 7 A Absolutely, yes. And frankly, people don't even  
 8 know what pit bulls are. They don't even understand why  
 9 we're calling dogs pit bulls. Big dogs can be a pit bull  
 10 to the average person on the street.  
 11 Q Doctor, have you done any work with -- I want to  
 12 say it's the Missouri 500 that was, I think, between 4 and  
 13 500 pit bulls were seized from dog fighting operations.  
 14 A This was the --  
 15 Q Have you done any work with that --  
 16 A Sorry.  
 17 Q -- case, specifically?  
 18 A Other than having my colleagues at the ASPCA  
 19 working on it, I have not personally worked on it at all.  
 20 Q Have you ever done any work with dogs seized from  
 21 we'll call it dog fighting organizations?  
 22 A Yes.  
 23 Q Tell me a little bit about that, please.  
 24 A The New Hampshire SPCA raided a dog fighting --  
 25 all the dogs were in Quonset huts, so I'm not sure what to

1 call it -- operation, a dog-fighting operation in New  
 2 Hampshire, and they kenneled all of the fighting dogs that  
 3 they took, and most probably -- it was probably at least 50  
 4 fighting dogs, or 50 dogs. They weren't -- they were dogs  
 5 at this facility. They were not all fighting dogs. And I  
 6 evaluated -- I think I evaluated about 10 of them, and I'm  
 7 not sure -- I can't remember why I evaluated 10 of them.  
 8 There were a number of puppies. And the feeling,  
 9 at the time, was that, genetically, they were from fighting  
 10 dog stock, and they put all the puppies to sleep. And I  
 11 said, "How do you know what they're like?" And they did  
 12 not want to take a chance, so they put all the puppies to  
 13 sleep. The dogs I evaluated, I evaluated some brood  
 14 bitches, mothers. I evaluated dogs that were fighters, and  
 15 they were scary dogs, not to people, they were very  
 16 friendly to people, but they were, like, scary to other  
 17 dogs. And, but not the sweet, old brood bitches; they were  
 18 delightful, and/or a little bit fearful. So, yes, I did  
 19 evaluate dogs from a fighting facility.  
 20 Q What was your opinion of those dogs that were  
 21 scary? What made them scary?  
 22 A They were not -- they were really strong, they  
 23 were not easy to hold back, and they had one thing on their  
 24 brain, to bite another dog. It was, like, no delay in  
 25 their brain. See dog, bite, see dog, bite. But not those

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1 brood bitches. See dog, hi, nice to see you, right?

2 Q Were most of those dogs what you'd call pit bulls

3 or pit mixes?

4 A Oh, boy. They were -- they didn't look anything

5 like what we're calling pit mixes. They were little, squat

6 dogs, very short dogs, and they were -- I suppose we would

7 have called them pit mixes, but they did not look at all

8 like the dogs that are coming through the shelters, so.

9 Q What differentiated them from the dogs that were

10 coming through the shelters?

11 A These were short, squat, very muscular. The dogs

12 that come through the shelters, they're lanky, they're

13 goofy, they're tall, they're -- they might have a little

14 bit of a broad head, but that's it.

15 Q You made a comment a little earlier --

16 A Mm-hm.

17 Q -- about rage syndrome. What is rage syndrome?

18 A Rage syndrome was originally used to describe

19 this syndrome in English Springer Spaniels. Since it got

20 -- I don't know who originally coined the word. Since

21 then, people have expanded on what it means.

22 So the original rage syndrome was a dog that was

23 a dog that was aggressive to their owners over food,

24 resting area, favorite person, and would get a look in

25 their eyes before they would do the threatening gesture,

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1 whether it be a snap, whether it be a growl, whether it be

2 a bite. Now, it went -- I don't know what the original

3 definition was, but that's what I was seeing during my

4 residency.

5 People then saw it as an unprovoked episode of

6 aggression. I never saw an English Springer Spaniel that

7 people called rage syndrome that was unprovoked. It was

8 not understandable by a human being, but the dog seemed to

9 think it was provoked; the dog seemed to feel that he or

10 she was provoked. So that's rage syndrome. That's the

11 original observation, and I feel was the original

12 definition of rage syndrome.

13 Q In your work as a behaviorist, do you have any

14 opinion as to what causes unprovoked periods of aggression

15 in a dog?

16 A I do not feel there are, I'm going to say, any

17 unprovoked episode of aggression. I believe the dog is

18 provoked. The dog feels provoked. The human being,

19 because they don't think like dogs, they think it's

20 unprovoked. They feel that dogs should be benign, and

21 friendly, and friendly to everyone, and like to be petted.

22 And so if you go over and pet a dog and the dog bites you,

23 it's unprovoked to the human being, but it's very provoked

24 to the dog; he didn't want to be petted. That's an example

25 of the difference between the definition between a human

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1 being and a dog.

2 Q I assume, in your line of work, you've read a lot

3 of reports about dog bites. Would that be true?

4 A Yes.

5 Q And one of the themes that we hear quite

6 frequently is the dog was unprovoked, or that the dog has

7 never done anything like this before, never bit before,

8 never shown any signs of aggression. Do you have an

9 opinion as to what would make these dogs -- I'm using the

10 word "snap," and you tell me if there's a better word --

11 but do you have any opinion as to what goes on with these

12 dogs where a seemingly always been nice dog will turn on

13 possibly its owner or another individual and cause a severe

14 injury?

15 A Yes. I see dogs, I'm not going to say sometimes,

16 that people come in with a dog bite, and they say, "The dog

17 never did this before. The dog did it out of the clear

18 blue sky. We don't know what's going on in the dog's

19 brain." I would say 100 -- 99 percent of the time, there's

20 a history of threats, there's a history of showing teeth,

21 there's a history of growling, there's a history of moving

22 away that people did not notice, did not understand. I

23 don't think they noticed because they didn't understand it.

24 Therefore, when they continued to do the things that the

25 dog didn't like then it was unprovoked, where the dog was

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1 reacting to a situation in many ways before the dog finally

2 bit. So I would say in 99 percent of the time, the dog has

3 shown signs of having more of a tendency to bite than not.

4 So was it unprovoked? No. Was it out of the clear blue

5 sky? No. Was the human being not noticing what was going

6 on? Yes.

7 Q What about the 1 percent where the dog truly was

8 -- never showed signs of aggression and wasn't provoked?

9 What would be your opinion of that type of situation?

10 A You need to give me a history, you need to give

11 me the details. I can't tell you. I think, in most cases

12 in that 1 percent, I don't have enough information.

13 Q Okay. You said 99 percent of the time humans

14 missed the key factors that they should have seen.

15 A I don't think I said they should have seen.

16 Q Okay. Let's just say the 99 percent --

17 A They didn't see.

18 Q -- they missed it.

19 A They didn't see, correct, yes. And it's really

20 because they don't understand. It's a lack of

21 understanding, dog behavior, because we're humans and

22 they're dogs. My primary job when I see biting dogs,

23 aggressive dogs, is helping people understand what's going

24 on. Understanding really helps in management, in

25 prevention of future dog bites.

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1 Q You said, in your line of work, the number one  
 2 problem in dogs is aggression.  
 3 A Yes.  
 4 Q What are some of the things that you would do as  
 5 a behaviorist to treat that number one problem?  
 6 A Every dog is different, every family is  
 7 different. So what I would recommend for one dog and one  
 8 family, I wouldn't for another. It's what people are  
 9 capable of doing, what the dog is capable of doing.  
 10 Q Doctor, if I told you that in 2007 in the city of  
 11 Sioux City, pit bulls comprised of 3 percent of the dog  
 12 population in Sioux City, but that that 3 percent was  
 13 responsible for 47 percent of the dog bites, would you have  
 14 an opinion as to why that number would be so large in  
 15 comparison to the other breeds?  
 16 A How many dogs are we talking about?  
 17 Q I'm sorry?  
 18 A How many dogs in Sioux City, how many dogs are  
 19 registered?  
 20 Q The number is around 14,000.  
 21 A I'll need a pen. 14,000 dogs, wow. They have a  
 22 really high registration. How many people are in Sioux  
 23 City?  
 24 Q Around 90,000.  
 25 A Pretty small. Okay. 14,000 dogs, wow.

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1 Q Doctor, I may be wrong on that. I don't have it  
 2 in front of me. That's the number that sticks in my head.  
 3 But let's call it 5,000.  
 4 A 5,000, okay.  
 5 Q Just for a hypothetical.  
 6 A Okay. Do you know how they do the registration  
 7 in Sioux City?  
 8 Q I do not, Doctor.  
 9 A Registration numbers are pretty low in cities,  
 10 and so I would say probably a quarter of the dogs are  
 11 registered. So I don't know the numbers in Sioux City, but  
 12 even in Cambridge, Massachusetts, you know, when we're all  
 13 -- we're supposed -- we try to do the right things. And  
 14 now they have us register online, but before we registered  
 15 online, it was all by mail, and I don't think they were  
 16 getting even half the dogs registered. So anyways, so if  
 17 we look at the numbers of registration and then we look at  
 18 5,000 dogs and how many dog bites were there? I think you  
 19 said 2007. We have those numbers, right?  
 20 MR. SUMMERLIN: Well, let's --  
 21 THE DEPONENT: Okay.  
 22 MR. SUMMERLIN: Justin, did you have a number for  
 23 the dog bites in 2007 that you wanted Amy to look at?  
 24 MR. VONDRAK: No, I did -- I do not.  
 25 THE DEPONENT: Okay. Because I think we really

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1 do look at -- now, some places require pit bull dogs to be  
 2 registered, so then we would have a whole screwed-up number  
 3 of registration, right? I don't know if Sioux City  
 4 required pit bulls to be registered and they didn't care  
 5 about the other dogs. So these numbers, I don't know what  
 6 they mean. I just -- I don't know what they mean.  
 7 BY MR. VONDRAK:  
 8 Q Okay. Doctor, what have you referred to  
 9 specifically in your preparation or knowledge of the Sioux  
 10 City case? What documents have you reviewed?  
 11 A I have written about the Sioux City law, I've  
 12 read about the bite incident, of the collection of data  
 13 between the bites and the breeds of dogs and how -- where  
 14 it's the county-wide data for the Sioux City Health  
 15 Department and then which did go over breeds and then from  
 16 the Sioux City Police Department, and these two numbers are  
 17 not comparable because they cover different time spans.  
 18 They're similar, but they're not the same. So which one do  
 19 you believe? So I looked at that, so that's -- I think  
 20 that's -- is that what you mean?  
 21 Q Sure. So you've looked at the dog bite data from  
 22 the health department as well as the police department. Is  
 23 that correct?  
 24 A Correct.  
 25 Q And you've read the ordinance.

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1 A Correct, I did.  
 2 Q And is that the extent of your preparation in  
 3 reviewing for the Sioux City case?  
 4 A I've also read newspaper articles.  
 5 Q Newspaper articles originating in Sioux City?  
 6 A I Googled this, so yes, yes.  
 7 Q Okay.  
 8 A Yes, yes, yes, the Sioux City Journal.  
 9 Q Doctor, how were you retained in this case?  
 10 A Originally, I was retained by Stacey Coleman from  
 11 the Animal Farm Foundation and the National Canine Research  
 12 Council.  
 13 Q And Stacey Coleman, what is her title at the  
 14 Animal Farm Foundation?  
 15 A She's probably the executive director. I would  
 16 think so. Yes, okay, executive director.  
 17 Q When you first talked to Stacey, what did she  
 18 have to say about Sioux City's pit bull ban?  
 19 A When I first talked to her, the first complaint  
 20 was by a woman who had a Staffordshire bull terrier and who  
 21 was not allowed to live in Sioux City. It had been loose,  
 22 and then it was caught by police or animal control and then  
 23 became -- she -- they said that they would either -- they  
 24 wanted the dog out of Sioux City, and she was forced to  
 25 send the dog to her relatives in upstate New York or

1 someplace far away from Sioux City.  
 2 And my main interest is that Staffy Bulls,  
 3 they're really nice dogs, and that they're part of this  
 4 ordinance, I just -- my question was, "Take a look at the  
 5 individual dog. Maybe this is not a nice dog, I don't  
 6 know, but maybe it's a really nice dog. Why not let it be  
 7 in Sioux City if it's a really nice dog?" But there was no  
 8 exception for really nice dogs in Sioux City.  
 9 So either they look at your confirmation and they  
 10 say, "You're a bad dog based on your confirmation." And  
 11 confirmation, you know, says you're part of this group of  
 12 dogs, but in essence, that's not why you get dogs out of  
 13 Sioux City. You want to get dangerous dogs out of Sioux  
 14 City. You don't want to get nice dogs out of Sioux City.  
 15 Anyway, so that was the -- my original contact  
 16 was about the Staffy Bull. I like Staffy Bulls.  
 17 Q Have you had any other interaction with the  
 18 Animal Farm Foundation besides the Sioux City case?  
 19 A Since Sioux City or prior to Sioux City?  
 20 Q Just in general.  
 21 A Yeah, I have, I have.  
 22 Q What have you done with Animal Farm Foundation?  
 23 A We put together the -- is this it -- the co-  
 24 occurrence article. I helped with that with Karen Delise  
 25 and Gary Patronek. I helped Victoria Boyd with her breed

1 study, and she was a part -- she was working with the  
 2 Animal Farm Foundation at the time. Let's see, what else  
 3 have I done? I first met Jane Burke who started the Animal  
 4 Farm Foundation when I was in New York City, and we held a  
 5 daylong conference on the behavior of pit bull terriers.  
 6 And so really she had nothing to do with that. I did that  
 7 on my own. And that was all an evolution of the original  
 8 pit bull conference that came out of Tufts prior to that,  
 9 that was in the '80's. But since then, other than  
 10 conversation with the Animal Farm Foundation, I really  
 11 haven't done anything with them.  
 12 The numbers needed to ban was really Gary  
 13 Patronek and I, we came out of a conversation. I was  
 14 saying, "What about numbers? What number needed to treat?"  
 15 He's, like, "Why can't we look at numbers needed to ban?"  
 16 And he's the one who came up with this, so. He's an  
 17 epidemiologist, so. But that wasn't through the Animal  
 18 Farm Foundation, that was through Gary, so.  
 19 Q Okay. Have you ever been paid directly or  
 20 indirectly from the Animal Farm Foundation for any work  
 21 that you've done with them?  
 22 A Indirectly. Indirectly they have paid me as a  
 23 consultant, but not specifically, not for Sioux City. I'm  
 24 not being paid for -- to work on Sioux City, right? So.  
 25 Q What work did you do to receive compensation from

1 them?  
 2 A I'm trying to remember. Well, I am -- most  
 3 recently, I'm teaching this course for the University of  
 4 Florida on shelter dog behavior, and one of the people from  
 5 the National Canine Research Council is going to teach a  
 6 part of a course on dog bites, and so the influence for the  
 7 University of Florida, I got paid a little bit. And also,  
 8 the -- on the behavior evaluation, the -- what does  
 9 behavior evaluations mean, I got paid a little bit for that  
 10 too.  
 11 Q How much would you say in all the work that  
 12 you've done for the Animal Farm Foundation, how much money  
 13 have you received from them?  
 14 A I received \$6,000 last year. But how much money  
 15 -- how much work have I done for them as a consultant, as a  
 16 discussion? It's -- like, it's not, like, work-work.  
 17 It's, like, what's the word I want? It's, like,  
 18 clarifying, discussion, what can we do, and things like  
 19 that. It's not, like, work. And I've been -- I've had a  
 20 relationship with them for probably ten years. Have I  
 21 gotten paid for anything? No. Uh-uh. This is most  
 22 recently, last year, I got paid \$6,000.  
 23 Q Did you receive anything that was in 2017 -- did  
 24 you receive any money in 2016 from the Animal Farm  
 25 Foundation?

1 A Maybe some.  
 2 Q Do you know how much?  
 3 A Maybe -- I don't know, I don't know. I know I  
 4 got paid last year.  
 5 Q Did you receive a 1099 from them?  
 6 A Yes.  
 7 Q Did you receive a 1099 for the tax year 2016?  
 8 A Maybe. I can't remember. My life has been  
 9 changing in terms of leaving the Animal Rescue League of  
 10 Boston, and so.  
 11 Q Did you receive a 1099 in 2015?  
 12 A I don't know. I can check my books, so.  
 13 Q Have you ever done any work with Dr. Alan Beck?  
 14 A Yes.  
 15 Q And tell me about that work.  
 16 A Alan Beck was the head of my department during my  
 17 residency at the University of Pennsylvania.  
 18 Q And what work did you specifically do with Dr.  
 19 Beck?  
 20 A We would have probably monthly or weekly meetings  
 21 with the Department, and he was mostly dealing with human-  
 22 animal bond stuff. That was his expertise.  
 23 Q What is your opinion of Dr. Beck as a -- well, in  
 24 the field of animal behavior?  
 25 A I'm going to start out with Dr. Beck has been a

1 friend for a lot of years. I don't think he knows anything  
2 about dog behavior. He is not an expert in dog behavior.

3 Q You said he doesn't know anything about dog  
4 behavior. Can you explain --

5 A I should not have said anything. Of course  
6 everyone knows something about dog behavior. I do not  
7 believe he's an expert. I think that's what I said after I  
8 said that he doesn't know anything. He's not an expert in  
9 dog behavior.

10 Dr. Beck also likes -- I don't know if you know  
11 about his history at all, Dr. Beck. He was head of the  
12 Department of Public Health in the city of New York, and he  
13 eliminated the rabies vaccine. That caused an uproar in  
14 New York City. Veterinarians couldn't get paid for giving  
15 rabies vaccines to dogs. And then he was responsible for  
16 the pooper-scooper law. So in a way, we can think of that  
17 Alan Beck is pretty brilliant, and I think, in ways, he is,  
18 but he loves sensation.

19 Q What do you mean when you say, "He loves  
20 sensation"?

21 A Oh, he loves to be famous, he loves to be known,  
22 he loves to be out there. Yeah, there are people like  
23 that. I think we have one who's president now. Don't --  
24 scratch that, scratch that. He's much older now, so he's --  
25 - I saw him a few years ago, and I don't know that his

1 personality changed.

2 Q Are you aware of his work with Dr. Lockwood and  
3 Victoria Boyd -- and it is dated, it's from 1983, in the  
4 public health report -- it's "Attacks by Packs of Dogs  
5 Involving Predation on Human Beings."

6 A That was at the beginning of my residency.  
7 Attacks by packs of dogs? I don't know that I'm -- if  
8 Victoria Boyd was in on it, I probably was aware of it  
9 during my residency. How many dogs were there in that  
10 article?

11 Q You know what, Doctor, I don't have that article  
12 in front of me. I was just curious of your knowledge of  
13 that article.

14 MR. SUMMERLIN: I think I've got it. Justin, I  
15 was just trying to find it so that she could see it and  
16 then see if she recognizes it, but give me just a second.

17 THE DEPONENT: Oh, it's Peter. Okay. When's  
18 this published? January, February. Public health reports.  
19 Okay.

20 MR. SUMMERLIN: Justin, I just handed Amy a copy  
21 of that article for her to review.

22 MR. VONDRAK: Okay.

23 THE DEPONENT: Dog bites. There's three cases  
24 studying about two fatalities. Unpicked dogs consumed some  
25 -- You know, actually, I interviewed this -- there was a

1 Saint Bernard that was involved in this. Victoria Boyd  
2 said, "You want to listen to my interview with the" -- one  
3 was a kid, right, the victims, yeah, that was eaten? It  
4 was a Saint Bernard if that's the same group of dogs here.

5 MR. SUMMERLIN: Yeah, and then one was, like, an  
6 81-year-old --

7 THE DEPONENT: Woman?

8 MR. SUMMERLIN: -- woman?

9 THE DEPONENT: She was a fatality?

10 MR. SUMMERLIN: Yeah, yeah. And then those were  
11 the dogs, yeah.

12 THE DEPONENT: Oh, those were here Dachshunds.

13 MR. SUMMERLIN: Yeah.

14 THE DEPONENT: Yeah.

15 MR. SUMMERLIN: And that's actually Victoria in  
16 the room with those dogs.

17 THE DEPONENT: Right. Okay. She looks good. So  
18 okay. So I'm looking at the article right now. So, yes, I  
19 have seen this article, yes, I know of it,

20 BY MR. VONDRAK:

21 Q What is your opinion of that article?

22 A Well, isn't it just a descriptive? Do they say  
23 why? Yeah, they did say why. I would need to read this in  
24 detail.

25 Q I won't ask you to do that now, Doctor. I was

1 just curious if you were familiar with it.

2 A So one was a pack of dogs, yeah, the 11 dogs.

3 MR. SUMMERLIN: I believe they were all packs in  
4 that one.

5 THE DEPONENT: They were all packs.

6 MR. SUMMERLIN: Or at least multiple animals in  
7 the study.

8 THE DEPONENT: Oh, I'm sorry. Yeah, I can't say  
9 that I'm really that -- right. Eight dogs. So I think  
10 it's unusual to have, in these fatal dog attacks, fatal dog  
11 cases, of having packs of dogs. Hardly any of them are  
12 packs of dogs. There might be a couple of dogs, three  
13 dogs, but they're not -- most of the fatal dog attacks are  
14 not packs of dogs.

15 BY MR. VONDRAK:

16 Q Doctor, how much are you being paid for your work  
17 in this case?

18 A Zero.

19 Q Zero?

20 A I'm still being paid a fee. I probably get --  
21 I'll get \$6,000 this year from the Animal Farm Foundation,  
22 but I'm not being paid particularly for representing for  
23 Sioux City.

24 Q Do they just basically give you the \$6,000 so  
25 that if they need your assistance that you will assist

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1 them?

2 A I-- you know, the way I saw this is that I was a

3 consultant for the Animal Farm Foundation for years without

4 being paid other than flying me down to Florida to go to

5 meetings, but so I thought, in my pea brain, that they were

6 making up for when they hadn't paid me. So that's what I

7 thought. So is it that they're paying me so they can use

8 me as a consultant in the future? Maybe. I would think

9 maybe so. But also for thanking me for all the work that I

10 did for them in the past.

11 Q Doctor, how much do you make annually now?

12 A Right now I am semi-retired, so I -- overall, I

13 get \$60,000. That's with -- I'm on social security, so I

14 am semi-retired, so --

15 Q Good for you.

16 A Yeah. Oh, yes, for the little bit of work that I

17 do, I keep very busy, but I'm not getting paid a lot of

18 money, but it's fine.

19 Q Sure.

20 A It's great. I don't need it.

21 Q When you were working full-time -- when was the

22 last year that you worked full-time before you became semi-

23 retired?

24 A With the Animal Rescue League? Let's see, when

25 was that? I don't know, it must have been four years ago.

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1 I made \$130,000, so.

2 MR. VONDRAK: Okay. Well, Doctor, I think that

3 wraps it up for me.

4 THE DEPONENT: Oh, excellent.

5 MR. VONDRAK: Gene might have a few questions for

6 you.

7 MR. SUMMERLIN: Yeah, do you mind if we take a

8 quick break?

9 MR. VONDRAK: Not at all.

10 MR. SUMMERLIN: Let's see. I don't know if

11 there's a mute. Oh, there it is. No?

12 THE DEPONENT: You can turn it off, no?

13 MR. SUMMERLIN: Yeah. So, Justin, I'll text you

14 when we're ready to resume and then you can just recall

15 this number. Would that work for you?

16 MR. VONDRAK: That works fine.

17 MR. SUMMERLIN: All right. Thanks, Justin.

18 THE REPORTER: It's 12:26. We're off the record.

19 [OFF THE RECORD]

20 [ON THE RECORD]

21 THE REPORTER: The time is 12:51. We're back on

22 the record.

23 CROSS-EXAMINATION

24 BY MR. SUMMERLIN:

25 Q Okay. Dr. Marder, I want to ask you a couple of

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1 follow-up questions about some of the things that you

2 stated in response to Mr. Vondrak's questions. You talked

3 about kind of an informal study that you did at the -- I

4 think it was the Animal Rescue League --

5 A Correct.

6 Q -- where you took the animals that shelter staff

7 had labeled as pit bull mixes and then you obtained Wisdom

8 Panel DNA tests on those dogs. And I believe what you

9 stated was not all dogs that had been labeled pit bull

10 mixes had any Staffordshire terrier or bull terrier in

11 their genetic make up, and that for those that did, a

12 number of them, if not -- or I think what you said was most

13 had a very small amount of those breeds. Is that right?

14 A Yes.

15 Q Okay. And you mentioned specifically that it

16 wasn't at the parent or the grandparent progression of the

17 pedigree. It would be further back than that?

18 A What I would like to do, I did present this data

19 with Victoria Boyd at an international meeting in

20 Edinburgh. What I'd like to do is see if I can find the

21 exact numbers for you.

22 Q Okay.

23 A So before we state that, I would like to try to

24 find the exact numbers for you, and I will work on that

25 today.

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1 Q Okay. And then, as part of that discussion, you

2 also mentioned the Chameleon program. And is that program

3 the software that animal shelters use to kind of manage

4 their operation?

5 A Yes.

6 Q Okay. There was also a discussion about the

7 accuracy of reported numbers of dog bites. Do you recall

8 answering some questions about that?

9 A Yes.

10 Q Okay. And we know that, no matter what

11 jurisdiction you're looking at, not all dog bites get

12 reported to any medical professional or governmental

13 agency. Would you agree with that?

14 A Yes.

15 Q So part of your issue with looking at number of

16 bites is the fact that whatever number gets reported

17 doesn't represent all bites, correct?

18 A Yes.

19 Q But if we want to compare, like, a city's number

20 of dog bites over time, as long as the method that the city

21 used to collect that data didn't change over that same

22 period of time, it's okay to compare dog bites in 2007 and

23 dog bites in 2013.

24 A Correct, as long as we know that the method of

25 collection has not changed.

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1 Q Right. And so when you, in your studies, looked  
 2 at number of bites, were you making sure that the data you  
 3 were relying on for your papers was data that you could  
 4 rely upon because it had been collected in the same manner?  
 5 A My question is what kind of studies --  
 6 Q Oh, I thought -- did you --  
 7 A -- on number of bites?  
 8 Q Well, like, you know, when you looked at in the  
 9 co-concurrence (sic) paper, and you're looking at, you  
 10 know, that was dog bite fatalities --  
 11 A Mm-hm.  
 12 Q -- but you were making sure that the data had  
 13 been consistently collected over that period of time.  
 14 A If we're talking about this paper the co-  
 15 occurrence paper, I -- my participation in this paper was  
 16 not the collection of data.  
 17 Q Okay.  
 18 A Karen Delise collected the data, so.  
 19 Q What about in the numbers needed to ban study?  
 20 A Okay. Okay. In the numbers needed to ban, Dr.  
 21 Patronek collected -- he read, in the media, the -- not in  
 22 the media, but he looked at dog bite statistics. I was not  
 23 a part of that either.  
 24 Q Okay.  
 25 A I was a part of interpreting the behavior --

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1 Q Okay.  
 2 A -- of the dogs, but I didn't collect the data.  
 3 Q You're not an epidemiologist.  
 4 A No.  
 5 Q Okay.  
 6 A No, no.  
 7 Q All right.  
 8 A So on both of these papers, that's not what I  
 9 did.  
 10 Q There was also some discussion about your  
 11 involvement when a number of fighting dogs had gotten  
 12 brought to --  
 13 A New Hampshire SPCA.  
 14 Q Okay. And I think you mentioned that the actual  
 15 dogs that had -- the offspring that were raised to fight  
 16 were very aggressive towards other dogs, but the brood  
 17 bitches were not.  
 18 A The brood -- I would say one brood bitch that I  
 19 evaluated was not --  
 20 Q Okay.  
 21 A -- from what I remember of her.  
 22 Q Can you draw any conclusions from that as an  
 23 animal behaviorist?  
 24 A My conclusion is that when you are -- this is as  
 25 a dog breeder too -- that when you're breeding dogs for

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1 whatever reason, whether it be beauty, whether it be  
 2 working capability, you're going to get a lot of  
 3 variability within the litter. So if you're breeding dogs  
 4 to go to a dog show, you're probably just going to get one  
 5 dog that's able to go to a dog show because of their looks.  
 6 And if you're breeding for working ability, the same may go  
 7 for that, they will get one dog. If you're breeding for  
 8 having puppies, that's -- every dog can have puppies.  
 9 It's, like, easy. It doesn't matter what their working  
 10 ability or their looks are, a dog can have puppies, so.  
 11 Q Are you familiar with the term "gameness" as it  
 12 relates to fighting dogs?  
 13 A Yes.  
 14 Q And what does that refer to?  
 15 A The definition of gameness is the -- I think it's  
 16 the -- I think it's kind of like a personality trait. It's  
 17 the able -- the dog is able to -- I need to look up the  
 18 definition of gameness. Of do it, you know, do the game,  
 19 whether --  
 20 Q It's, like, eagerness to --  
 21 A Eagerness, that's a good one.  
 22 Q Okay.  
 23 A Eagerness, yeah. And the ability, there's an  
 24 ability too. It's, like, you are really going to get it  
 25 done, you know.

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1 Q So it's, like, being motivated?  
 2 A Yeah, motivated, yeah.  
 3 Q Okay.  
 4 A Mm-hm.  
 5 Q So my understanding is that breeders of fighting  
 6 dogs try and breed for gameness --  
 7 A Correct.  
 8 Q -- using that current definition, correct?  
 9 A Yes, correct. Yes, correct.  
 10 Q Does gameness alone mean that a dog is going to  
 11 be aggressive to other dogs or aggressive to people?  
 12 A Gameness. If you're breeding fighting dogs, the  
 13 gameness probably mean the dog is going to want to bite  
 14 another dog. So if the dog is in heat, it probably would  
 15 not bite the other dog. So the gameness is the dog will go  
 16 and bite another dog. There's training in that too. The  
 17 dog would need to be trained --  
 18 Q And I guess --  
 19 A -- to do that.  
 20 Q That's really what I was asking.  
 21 A Yeah, right.  
 22 Q The gameness personality trait alone without  
 23 training, like, directing that personality trait towards  
 24 dog-on-dog aggression, it doesn't mean that dog, without  
 25 that training, would be aggressive to other dogs.



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1 A I bet it's not 100 percent. I bet some dogs,  
 2 without the training, could be able to do it, and but they  
 3 would probably do it better with the training.  
 4 Q Okay.  
 5 A And so it's -- but the -- but dogs that are not  
 6 game, there's probably no amount of training to get that  
 7 dog into a good fighting dog --  
 8 Q Okay.  
 9 A -- without the gameness, so.  
 10 Q Does gameness appear across all breeds and mixed  
 11 breeds as well?  
 12 A Not for fighting.  
 13 Q Right, but --  
 14 A But for -- yeah.  
 15 Q But motivation.  
 16 A The motivation, yes. So if we call that  
 17 gameness, the ability to retrieve something, that's  
 18 probably gameness of that style of gameness, yeah.  
 19 Q And similarly, you've talked about rage syndrome  
 20 as it was -- I think it was English what?  
 21 A Springer Spaniels.  
 22 Q Yeah, Springer Spaniels. Does that behavior  
 23 appear across all breeds and mixed breed dogs as well?  
 24 A Yes. To a degree, yeah, yes, but every dog is  
 25 different, so this --

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1 Q Yeah, but it became more of a problem with the  
 2 English Springer Spaniels because of those two --  
 3 A Right.  
 4 Q -- studs that you referred to --  
 5 A Right.  
 6 Q -- that were used.  
 7 A Yes. Right, yes.  
 8 Q Okay. Are you aware of any current  
 9 epidemiologists or animal behaviorists that agree with Dr.  
 10 Beck that the fatal dog bite data supports the conclusion  
 11 that pit bulls are more dangerous than other breeds?  
 12 A Could you say that again?  
 13 Q Yeah, I -- and I'm just asking --  
 14 A Right.  
 15 Q -- if you're aware of any current epidemiologists  
 16 or animal behaviorists that agree with Dr. Beck that the  
 17 fatal dog bite data that he looked at support the  
 18 conclusion that pit bulls, as a breed, are more dangerous  
 19 than other breeds.  
 20 A No.  
 21 Q Are you aware of any current epidemiologists or  
 22 animal behaviorists that believe that breed alone can  
 23 predict a dog's potential to be aggressive to humans or  
 24 other dogs?  
 25 A No.

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1 Q You talk a little bit about your work as a  
 2 veterinarian.  
 3 A Mm-hm.  
 4 Q During your work as a veterinarian, did you treat  
 5 pit bull dogs?  
 6 A Yes.  
 7 Q And what was your experience?  
 8 A They're very good patients.  
 9 Q And what do you mean by that?  
 10 A They're not afraid of things that you're going to  
 11 do with them. This -- again, I'm generalizing.  
 12 Q Every dog is different.  
 13 A Every dog is different. They're wiggly. Again,  
 14 I'm generalizing. I did not have a problem with what I  
 15 remember with pit bulls.  
 16 MR. SUMMERLIN: Okay. That's all that I have.  
 17 THE DEPONENT: Okay.  
 18 MR. SUMMERLIN: Justin, do you have any follow-  
 19 up?  
 20 MR. VONDRAK: No, I don't.  
 21 MR. SUMMERLIN: Okay.  
 22 THE DEPONENT: Great.  
 23 MR. SUMMERLIN: We will read and sign --  
 24 THE REPORTER: It's 1:55 -- or 1:05 p.m. That  
 25 concludes the deposition.

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1 (THEREUPON, this deposition was concluded at  
 2 approximately 1:05 p.m.)  
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CERTIFICATE  
Commonwealth of Massachusetts  
Middlesex, ss.  
I, Catherine Burns, Notary Public in and for the  
Commonwealth of Massachusetts, do hereby certify that the  
witness whose deposition is hereinbefore set forth, was  
duly sworn by me and that such deposition is a true record,  
to the best of my ability, of the testimony given by the  
witness.  
I further certify that I am neither related to nor  
employed by any of the parties in or counsel to this  
action, nor am I financially interested in the outcome of  
this action.  
In witness whereof, I have hereunto set my hand this  
\_\_\_\_\_ day of \_\_\_\_\_, 2018.

Notary Public  
My commission expires:  
August 6, 2021

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SIGNING OF DEPOSITION

I, Amy Marder, do hereby certify that the foregoing  
transcript, including any correction(s) I have made and  
written on the errata sheet(s), is a true and accurate  
record of my deposition, which was held January 29, 2018 in  
Cambridge, Massachusetts.

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Amy Marder Date

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CERTIFICATE

Commonwealth of Massachusetts  
Middlesex, ss.

I, Catherine Burns, Notary Public in and for the Commonwealth of Massachusetts, do hereby certify that the witness whose deposition is hereinbefore set forth, was duly sworn by me and that such deposition is a true record, to the best of my ability, of the testimony given by the witness.

I further certify that I am neither related to nor employed by any of the parties in or counsel to this action, nor am I financially interested in the outcome of this action.

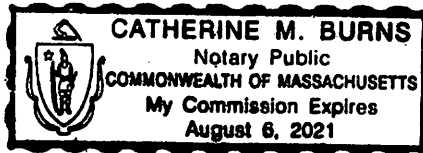
In witness whereof, I have hereunto set my hand this 16<sup>th</sup> day of February, 2018.



Notary Public

My commission expires:

August 6, 2021



<p style="text-align: center;"><b>A</b></p> <p><b>a.m</b> 2:2 4:9</p> <p><b>ability</b> 6:6,9 21:22 63:6,10 63:23,24 65:17 69:8</p> <p><b>able</b> 14:6 16:11 63:5,17,17 65:2</p> <p><b>Absolutely</b> 7:9 12:25 31:18 39:7</p> <p><b>abused</b> 35:10</p> <p><b>Academy</b> 6:23</p> <p><b>accuracy</b> 60:7</p> <p><b>accurate</b> 70:19</p> <p><b>action</b> 69:12,13</p> <p><b>actual</b> 62:14</p> <p><b>adduced</b> 5:9</p> <p><b>adopting</b> 35:8</p> <p><b>adoption</b> 18:21 18:25 26:10 35:18</p> <p><b>affect</b> 6:6,9</p> <p><b>affiliated</b> 35:24</p> <p><b>afraid</b> 39:3 67:10</p> <p><b>agency</b> 60:13</p> <p><b>aggression</b> 12:14,24 13:12 13:13,13,15,23 14:3,7 15:3,7 15:12,13,16,17 15:18 16:3 17:16,17 18:1 42:6,14,17 43:8 44:8 45:2 64:24</p> <p><b>aggressive</b> 13:7 13:11,20 33:20 41:23 44:23 62:16 64:11,11 64:25 66:23</p> <p><b>ago</b> 11:16 17:7 28:20 36:21 53:25 57:25</p> <p><b>agree</b> 60:13 66:9</p>	<p>66:16</p> <p><b>Alan</b> 52:13,16 53:17</p> <p><b>alcohol</b> 6:9</p> <p><b>alive</b> 19:8</p> <p><b>allow</b> 36:20</p> <p><b>allowed</b> 48:21</p> <p><b>American</b> 17:5 24:18,19 25:3 26:13</p> <p><b>Amesbury</b> 38:11,15,21</p> <p><b>amount</b> 59:13 65:6</p> <p><b>Amy</b> 1:20 3:1,4 5:8,13 6:17 46:23 54:20 70:17,24</p> <p><b>and/or</b> 40:18</p> <p><b>animal</b> 5:21,25 6:22,25 7:5 12:4,9,10 17:3 17:18 18:8,11 18:14,14,15,20 18:25 19:6,7,8 19:8,14,14,16 19:17,17,20,21 19:21,23,25 20:4,5,13,15 20:15,16,18,21 20:23,25 24:23 25:15,25 30:4 30:5 34:24 35:5,15,18,18 35:20 36:1,2,3 36:6,10,13,14 36:19 48:11,14 48:22 49:18,22 50:2,3,10,17 50:20 51:12,24 52:9,22,24 56:21 57:3,24 59:4 60:3 62:23 66:9,16 66:22</p> <p><b>animal's</b> 18:17</p> <p><b>animals</b> 7:25 8:3</p>	<p>18:10,19 19:22 35:8,10,12,13 36:7 56:6 59:6</p> <p><b>annually</b> 57:11</p> <p><b>answer</b> 6:6 23:15 28:5 32:6 37:21</p> <p><b>answering</b> 60:8</p> <p><b>answers</b> 6:13</p> <p><b>anybody</b> 14:6</p> <p><b>anymore</b> 15:2,2</p> <p><b>Anyway</b> 49:15</p> <p><b>anyways</b> 46:16</p> <p><b>apparently</b> 25:11</p> <p><b>appear</b> 34:3 65:10,23</p> <p><b>appearance</b> 4:18 24:20</p> <p><b>appearances</b> 2:7 4:13</p> <p><b>Appearing</b> 2:12 2:19</p> <p><b>appointments</b> 18:10</p> <p><b>appreciate</b> 12:23</p> <p><b>approach</b> 32:8</p> <p><b>approximately</b> 68:2</p> <p><b>Apsos</b> 15:14</p> <p><b>area</b> 22:19,20 41:24</p> <p><b>aren't</b> 29:17</p> <p><b>arm</b> 23:2</p> <p><b>article</b> 16:20 49:24 54:10,11 54:13,21 55:18 55:19,21</p> <p><b>articles</b> 48:4,5</p> <p><b>arts</b> 6:21</p> <p><b>ascertain</b> 14:6 16:11</p> <p><b>asked</b> 31:4,10</p> <p><b>asking</b> 28:14 64:20 66:13</p> <p><b>asks</b> 32:5</p>	<p><b>ASPCA</b> 36:9 39:18</p> <p><b>assist</b> 56:25</p> <p><b>assistance</b> 56:25</p> <p><b>assistant</b> 2:8 21:12</p> <p><b>assume</b> 43:2</p> <p><b>assuming</b> 30:10</p> <p><b>assumption</b> 15:5 15:6,18,20</p> <p><b>attack</b> 5:24</p> <p><b>attacked</b> 5:22 38:7,8</p> <p><b>attacks</b> 37:2,10 54:4,7 56:10 56:13</p> <p><b>attention</b> 37:25</p> <p><b>Attorney</b> 2:8</p> <p><b>audible</b> 6:12</p> <p><b>auditorium</b> 34:25</p> <p><b>August</b> 69:20</p> <p><b>Australian</b> 11:12</p> <p><b>author</b> 14:2 31:24</p> <p><b>Avenue</b> 2:4 4:11 7:3</p> <p><b>average</b> 39:10</p> <p><b>aware</b> 36:14 37:4 54:2,8 66:8,15,21</p>	<p>61:20</p> <p><b>bans</b> 31:5,11</p> <p><b>base</b> 7:23 30:17</p> <p><b>based</b> 24:6 31:12 49:10</p> <p><b>basically</b> 12:8 19:19 30:25 31:2 56:24</p> <p><b>beauty</b> 63:1</p> <p><b>Beck</b> 52:13,16 52:19,23,25 53:10,11,17 66:10,16</p> <p><b>befriended</b> 9:2 11:7</p> <p><b>beginning</b> 54:6</p> <p><b>begins</b> 4:2</p> <p><b>behalf</b> 2:12,19 4:12,15,19</p> <p><b>behavior</b> 6:22 6:25 7:5,20 11:25 12:1,4 12:10,21 17:3 17:13,22 18:8 18:10,17,22 19:15,15,15 34:18,20 44:21 50:5 51:4,8,9 52:24 53:2,2,4 53:6,9 61:25 65:22</p> <p><b>behavioral</b> 5:22 11:23 19:12,12</p> <p><b>behaviorist</b> 12:9 42:13 45:5 62:23</p> <p><b>behaviorists</b> 66:9,16,22</p> <p><b>behaviors</b> 12:12 20:9,10</p> <p><b>Beings</b> 54:5</p> <p><b>believe</b> 14:2,11 25:19 29:25 42:17 47:19 53:7 56:3 59:8 66:22</p> <p><b>benign</b> 42:20</p>
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