

In the Matter Of:

JANE DOE

-vs-

CITY OF SIOUX CITY IOWA, ET AL.

DOUGLAS SKINNER, DVM

January 25, 2018



CONNOR REPORTING

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1 IN THE UNITED STATES DISTRICT COURT
 2 FOR THE NORTHERN DISTRICT OF IOWA
 3 WESTERN DIVISION
 4 CASE NO. 16-cv-4107

5 JANE DOE, an individual, JENNIFER FROST,)
 6 an individual, and KALI MYERS, an individual,)
 7 Plaintiffs,)
 8 vs.)
 9 THE CITY OF SIOUX CITY IOWA; ROBERT PADMORE,)
 10 in his official capacity; and CINDY RARRAT,)
 11 in her official capacity,)
 12 Defendants.)

13 The deposition upon oral examination of
 14 DOUGLAS SKINNER, DVM, a witness produced and sworn
 15 before me, Lisa C. Pierce, a Notary Public in and
 16 for the County of Hamilton, State of Indiana, taken
 17 on behalf of the Plaintiffs at the Purdue
 18 University Veterinary Pathology Building, 725
 19 Harrison Street, Room 109, West Lafayette,
 20 Tippecanoe County, Indiana, on January 25, 2018,
 21 commencing at the hour of 1:45 p.m., pursuant to
 22 Applicable Rules of Procedure, with written notice
 23 as to time and place thereof.
 24
 25

3

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1 A P P E A R A N C E S
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 20
 21
 22
 23
 24
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4

1 1:45 p.m.
 2 January 25, 2018
 3 (Exhibit 1 and 2 marked for identification.)
 4 DOUGLAS SKINNER, DVM,
 5 having been first duly sworn to tell the truth, the
 6 whole truth, and nothing but the truth relating to
 7 said matter, was examined and testified as follows:
 8 THE WITNESS: Yes.
 9 DIRECT EXAMINATION,
 10 QUESTIONS BY MR. SUMMERLIN:
 11 Q. Dr. Skinner, we met just a moment ago. My name's
 12 Gene Summerlin. You understand you're here to have
 13 your deposition taken today in connection with a
 14 lawsuit that was filed in Sioux City.
 15 A. Yes.
 16 Q. Have you ever been deposed before?
 17 A. Do what? Yes, I have.
 18 Q. Okay. How many times?
 19 A. I -- it was one time in my clinic where I worked.
 20 It was on a case that involved a lawsuit with
 21 somebody. I was deposed then. I also testified in
 22 a court case here in Lafayette but there was no
 23 deposition. We just kind of went straight in.
 24 Q. Went straight to trial?
 25 A. Yeah.

<p>5</p> <p>1 Q. Okay. I'm gonna' ask you some questions today 2 about the opinions you've expressed in this case 3 and the basis for those opinions. 4 A. Uh-huh. 5 Q. If I ask you a question that doesn't make any sense 6 to you, just let me know -- 7 A. Okay. 8 Q. -- that you're not following me, and I'll try and 9 rephrase it. 10 A. Fine. 11 Q. I'm gonna' start by handing you what's been marked 12 as Exhibit 1. And that is a report that we were 13 provided by the attorneys for Sioux City. 14 A. Uh-huh. 15 Q. So take a look at that. And then let me know 16 whether this contains the opinions that you intend 17 to express. 18 A. Okay. I will mention, on the first paragraph, that 19 is based not on living with and training pit bulls. 20 It is on research that I've read -- 21 Q. Okay. 22 A. -- from different specialists that are, I guess, 23 Ph.D.s or DVMs. Okay? 24 Q. Okay. 25 A. Okay. Yeah. I'm -- I'm okay with that, yeah.</p>	<p>7</p> <p>1 go to Orlando, it's a veterinary conference -- 2 A. Yes. 3 Q. -- where you're getting continuing -- 4 A. Yes. Continuing education. 5 Q. -- education but continuing -- 6 A. Yeah. 7 Q. -- medical education. 8 A. Yeah. 9 Q. Classes last from an hour to -- 10 A. Right. Right. 11 Q. -- maybe half a day? 12 A. Yeah. It's nothing that's degreed. 13 Q. Right. 14 A. Nothing that's a certificate. 15 Q. Okay. It also says that you studied the 16 epidemiology, frequency and severity of dog bites 17 in the US? 18 A. Yes. 19 Q. Okay. Tell me about that. 20 A. Well, there's a site called dogsbite.org, which is 21 not a official site. But they have peer-reviewed 22 articles from places like the Annals of -- of 23 Surgery. They have reports from level-one trauma 24 centers, all peer reviewed. They have articles in 25 there by Dr. Beck, by Dr. Lockwood and some others</p>
<p>6</p> <p>1 Q. Okay. And then Exhibit 2 is a copy of your 2 curriculum vitae. Is that current? 3 A. Three and five are about the same. 4 Q. Yeah. 5 A. Yes. I'm okay. 6 Q. Okay. So I want to -- I want to talk to you about 7 the last paragraph in your CV. 8 A. In my what? 9 Q. The last paragraph on your CV. 10 A. Okay. 11 Q. Says you've taken several dog behavior classes. 12 A. Uh-huh. 13 Q. Tell me about those. 14 A. Those would have been at national meetings; they 15 were quite a few years ago. And they were geared 16 towards training. They were abbreviated. They're 17 not -- not a whole lot to them. 18 Q. Were these at, like, the AVMA meetings? 19 A. Yeah. It was a -- I believe that one was the 20 Florida meeting in Orlando. And I -- and the other 21 was the Ohio State meeting. 22 Q. Okay. 23 A. Okay? But none of it at the time had to do with 24 pit bulls. 25 Q. Right. And those are essentially, like, when you</p>	<p>8</p> <p>1 that talk about -- talk about basically how severe 2 things are. 3 And it corresponds with some of the instances 4 I've seen either in the news reports locally or in 5 cases that I have seen or in cases I read about in 6 the newspaper. 7 Q. Okay. Have you had any training as an 8 epidemiologist? 9 A. No. 10 Q. Okay. 11 A. And that's why I referred to -- that's why I refer 12 to the -- the results of the specialists, the 13 people who are. Because I'm not an ophthalmologist 14 either. But if I go to an ophthalmology class, 15 then I learn more about ophthalmology. 16 Q. Sure. 17 A. If I go to a renal -- renal disease, then I learn 18 more about that. And because in veterinary school 19 we took a curriculum that was -- that covered 20 everything, at that time a lot of large animal as 21 well. But we'd study virology, bacteriology, 22 ophthalmology, cardiology, soft-tissue surgery, 23 orthopedic surgery, ophthalmology, internal 24 medicine, cardiology maybe. 25 And in -- and in one of the -- one of the</p>

9

1 disciplines we studied was public health. Because
2 as a veterinarian we are responsible to the public
3 for public health.

4 **Q. Okay.**

5 A. And therefore to me, as a practitioner, when I
6 started to see -- let's just say we had mange or --
7 or some other disease like leptospirosis come into
8 the area. And -- and I go to a meeting or I read
9 about it in the veterinary journals, and I go, So
10 we're starting to see that; maybe we ought to
11 vaccinate for that more. Maybe we ought to do this
12 more. Maybe hunting dogs need it, and maybe the
13 other dogs don't.

14 So that does not make me an epidemiologist.
15 But it makes me an aware veterinarian to go -- know
16 what resources to go to so I can protect the public
17 health and the animal's health. And those diseases
18 I mentioned are diseases that are communicable to
19 humans.

20 **Q. Okay.**

21 A. Leptospirosis. Dog bites are very important to be
22 knowledgeable of because of my lay staff for
23 workmen's compensation. You know, if you get a
24 couple dog bites, you can lose your workmen's
25 compensation. You lose that you may go out of

10

1 business because you just -- you can't self insure.
2 **Q. Okay. Let me ask you some more specific questions.**
3 A. Uh-huh.

4 **Q. Have you authored any peer-reviewed**
5 **epidemiological --**

6 A. No, no.

7 **Q. I should explain. Because the court reporter's**
8 **writing everything --**

9 A. Sure.

10 **Q. -- that we say down and we're going to use that**
11 **transcript --**

12 A. Sure.

13 **Q. -- for some purposes, it's important that you let**
14 **me finish my question --**

15 A. Absolutely.

16 **Q. -- before you state your answer --**

17 A. Yeah.

18 **Q. -- so that when we read it it's not like --**

19 A. Talk, talk.

20 **Q. -- doob, doob, blah, blah, yeah.**

21 A. Okay.

22 **Q. Okay?**

23 A. All right.

24 MR. SUMMERLIN: And, now, do you have write
25 down doob, doob, blah, blah.

11

1 MR. VONDRAK: Did you get that?
2 THE WITNESS: I thought you were finished.
3 MR. SUMMERLIN: Do you need me to spell that?
4 THE REPORTER: You're killing me.
5 QUESTIONS BY MR. SUMMERLIN:
6 **Q. Have you authored any peer-reviewed epidemiological**
7 **papers addressing dog bites?**

8 A. No.

9 **Q. When you were in vet school -- let's see, what**
10 **years was that?**

11 A. I was -- graduated '72. So I've been here for '68
12 to '72.

13 **Q. How old are you?**

14 A. Seventy.

15 **Q. You look great.**

16 A. Next week.

17 **Q. I don't look that good and I'm 20 years younger.**
18 **I'm going home.**

19 A. Shouldn't have been a lawyer. Thank you.

20 **Q. Actually -- well, I was an animal science major.**
21 **And I planned to go to vet school --**

22 A. Uh-huh.

23 **Q. -- and then had to take --**

24 A. Well --

25 **Q. -- an organic chemistry and --**

12

1 A. -- I wanted to go to law school. I wanted to go to
2 law school, but I couldn't stand IU. So --

3 **Q. You state that you belong to two groups whose**
4 **purpose is to stop human deaths and injuries by**
5 **vicious, large-breed dogs. What are those groups?**

6 A. One of them was The Pit Bull Propaganda Machine
7 Exposed. And the other one I can -- they keep
8 adding more names to it. I can't remember the name
9 right now. I can get it to you. But they're just
10 Facebook groups.

11 **Q. Oh, okay.**

12 A. Yeah.

13 **Q. These aren't, like, official organizations.**

14 A. No, no.

15 **Q. All right.**

16 A. Although I've been contacted by a group of
17 pediatric surgeons to -- to start a group.

18 **Q. Okay. You say that you've testified in court**
19 **regarding the dangers of pit bulls.**

20 A. Uh-huh.

21 **Q. What case was that?**

22 A. That was in this city, in Lafayette. And it was a
23 child custody case. And the child, they didn't
24 like -- the mother did not like the daughter being
25 around the pit bull. It played rough with her,

13

1 scratched her a couple times. So I presented
2 information to the Court.
3 And at the end of the day the Court said,
4 Well, we can't tell from Dr. Skinner's testimony
5 whether or not this dog is gonna' bite. But as --
6 but the ex-husband was supposed to keep the dog
7 away from the child and had not done that. So he
8 said, Since you broke that rule, you've got to
9 kennel the dog. And, of course, the child did get
10 a bad face scratch in the interim.
11 **Q. All right. What courses have you taken on**
12 **behavioral genetics?**
13 A. None.
14 **Q. Okay. What courses have you taken on genetics at**
15 **all?**
16 A. Nothing except college. Nothing to do with this.
17 **Q. Okay. All right. I may have asked you this**
18 **already, but what courses have you taken on**
19 **epidemiology?**
20 A. None.
21 **Q. What courses have you taken on animal behavior?**
22 A. I took them here in -- at veterinary school for a
23 semester taught by Dr. Clinghammer.
24 **Q. So one course, one semester?**
25 A. One semester, yes.

14

1 **Q. And that covered all breeds?**
2 A. Well, that covered all -- all species.
3 **Q. All species.**
4 A. Yes.
5 **Q. Okay.**
6 A. Dog behavior wasn't such a -- a big deal then
7 because we weren't seeing some of the controversy
8 we're seeing now.
9 **Q. Okay.**
10 A. And you have to admit there is a controversy.
11 **Q. And other than -- what was your undergrad?**
12 A. I got in at two years. So I didn't have --
13 **Q. What was your degree in? Oh, you didn't get a --**
14 A. I didn't get a degree before I went in.
15 **Q. Okay.**
16 A. I got in in two years.
17 **Q. Okay. So your only degree is --**
18 A. DVM.
19 **Q. -- DVM?**
20 A. Uh-huh.
21 **Q. Where you say state that you've studied the**
22 **epidemiology, frequency and severity of dog bites**
23 **in the United States, I believe what you said is**
24 **you've reviewed articles that you found on**
25 **dogbites --**

15

1 A. Yes.
2 **Q. -- .org.**
3 A. Yes.
4 **Q. How many articles do you think you've read?**
5 A. Oh, I'll bet twenty.
6 **Q. Twenty?**
7 A. Yeah. Some of them were peer-reviewed medical, as
8 far as how severe bites were, what percent were pit
9 bulls, what percent were something else, what
10 percent resulted in death, what percent --
11 **Q. Sure.**
12 A. You know, all that. So --
13 **Q. Have you reviewed any articles that you obtained**
14 **from sites other than dogbite.org?**
15 A. Yeah. I can't remember what they were;
16 dogbites.org is one of them because it just -- it
17 covered a large spectrum. I also went to the
18 pro-pit site which seemed to be less scientific or
19 not scientific at all, a lot more emotional. Not
20 anything that --
21 **Q. Yeah, I --**
22 A. -- that was -- that seemed credible.
23 **Q. I -- I'm talking not Facebook groups or things like**
24 **that or -- or --**
25 A. Google, right.

16

1 **Q. Yeah. I'm asking whether you've conducted a**
2 **thorough literature research to review all of the**
3 **epidemiological articles related to dog bites, not**
4 **just those from dogbite.org.**
5 A. Yes. I -- I even talked to the AVMA, Emily Kane,
6 K-a-n-e, who made the AVMA proposal or made -- she
7 did the research for the AVMA stance on pit bulls.
8 So I actually corresponded with her after reading
9 her material. Which, as far as the AVMA position,
10 it just doesn't get any higher than talking to her
11 because she is the one that authored the research.
12 **Q. Okay. I'm not being very clear.**
13 A. Well, I mean, I haven't answered that area. So I'm
14 just trying to get you something that might be
15 similar.
16 **Q. Okay. Have you ever published any peer-reviewed,**
17 **scientific articles?**
18 A. No.
19 **Q. Okay. Are you familiar with the technical**
20 **definition of a literature review?**
21 A. No.
22 **Q. Okay. Have you done anything to ensure that you**
23 **have reviewed all of the epidemiological**
24 **peer-reviewed studies on dog bites?**
25 A. No.

17

1 **Q. Okay.**
2 A. I would say that they're constantly changing. And
3 I would say that what I have read from some points
4 of view to others seem to vary --
5 **Q. Okay.**
6 A. -- all over the place. Seems to be some
7 consistency when I read the medical, as far as
8 injuries and as far as the breed.
9 **Q. Okay.**
10 A. And --
11 **Q. What are your -- what research have you done into**
12 **the accuracy of visual identification of breeds?**
13 A. I have two that I did. One of them was by
14 University of Florida, Gainesville. If you want to
15 take a university review. And it said that
16 17.6 percent of the time you can identify a pit
17 bull. I also read one that was by the ASPCA. And
18 it said -- and they used the Wisdom Panel, which is
19 by the Mars Company.
20 The Mars Company now has expanded from candy
21 into being the largest owner of veterinary clinics
22 in the world. And they also are doing a DNA tests
23 called the Wisdom test. And they used the Wisdom
24 test and compared that to what the lay staff felt
25 was pit versus what really were. And -- and the

18

1 results, they were 96 percent. And that was by an
2 ASPCA facility.
3 **Q. Where was that study published?**
4 A. I think I have it down here.
5 **Q. Yeah. Would you grab it?**
6 A. Okay. Which I thought was very different from what
7 Dr. Lockwood said of 17 percent. And -- Vice
8 President of Equine Welfare. And -- and you may
9 get a different take on that than I did. But that
10 is what I took from it.
11 **Q. So it appears that this was printed off of a Web**
12 **site. And it's just a report from someone at the**
13 **ASPCA and --**
14 A. Fairly high up. Fairly high up. Vice president.
15 **Q. Yeah. This is --**
16 A. The Wisdom test also is -- okay. Yeah, I know it's
17 not peer reviewed. I know it's not --
18 **Q. Yeah, it's garbage.**
19 A. Is what?
20 **Q. Never mind.**
21 A. Okay. All right.
22 **Q. Um --**
23 A. Listen, I don't like the mocking, number one.
24 Number two, I came here as a veterinary
25 practitioner, so what I have seen in clinical

19

1 practice --
2 **Q. Okay.**
3 A. -- not as an -- not as an epidemiologist.
4 **Q. All right. Let's go through your report, this one.**
5 A. Okay.
6 **Q. Where did you get your information about the**
7 **history of the two Staffordshire breeds?**
8 A. I probably got that from the AKC. And I probably
9 got it from other reports online that seem to be
10 credible sites.
11 **Q. Like?**
12 A. I can't remember right now. I don't know of any
13 peer-reviewed articles or anything that has to do
14 with the background of the breed. These peer
15 reviews have been researched. I do know, from
16 Dr. Lockwood's reading, that they are a very
17 aggressive breed that don't know when to stop.
18 **Q. Okay. And where did you find that in a publication**
19 **by Dr. Lockwood?**
20 A. I have it over there.
21 **Q. Okay. Let's grab that one.**
22 A. (Witness complies.)
23 **Q. Thank you.**
24 A. I believe he's one of your expert witnesses.
25 **Q. He is. And this is a chapter of a book that he**

20

1 **wrote. I was just looking to see if -- do you know**
2 **what edition this one is?**
3 A. No.
4 **Q. Okay.**
5 A. Do you want a copy or you --
6 **Q. I've got it.**
7 A. Okay.
8 **Q. Do you recall when you obtained that?**
9 A. I'm sorry?
10 **Q. Do you recall when you obtained that?**
11 A. Oh, about four days ago I copied it off. But I'd
12 read it before.
13 **Q. Okay.**
14 A. I didn't know what all would be required. So --
15 **Q. And the document that we were referring to was a**
16 **chapter in The Domestic Dog: Its Evolution,**
17 **Behavior and Interactions with People. It was**
18 **written by -- that particular chapter on the**
19 **eth -- ethology, ecology and epidemiology of**
20 **canine aggression was written by Dr. Lockwood.**
21 **So -- and, you know, I apologize. I didn't**
22 **mean to be mocking you --**
23 A. We're good.
24 **Q. -- when I --**
25 A. But -- but those --

<p style="text-align: right;">21</p> <p>1 Q. -- out there. 2 A. Yeah. 3 Q. But here's what I -- I want to be very careful 4 about. When you're offered as an expert witness -- 5 A. Uh-huh. 6 Q. -- you know, certainly if we were talking about 7 standards of practice for veterinarians -- 8 A. Uh-huh. Right. 9 Q. -- or what meets the standard of care in the 10 treatment of a given disease or injury, there's no 11 question that you're qualified for that. 12 My concern is that you're being offered to 13 give opinions about behavior, genetics, behavioral 14 traits related to specific breeds. And it doesn't 15 appear that you have an education or a background 16 that uniquely qualifies you to know more about that 17 area than any other intelligent individual that's 18 read a number of studies. Would you agree with 19 that? 20 A. I agree with that. 21 Q. Okay. And so I want to -- 22 MR. SUMMERLIN: Actually, can we -- could we 23 take a two-minute break and let you and I talk? 24 THE WITNESS: Can I -- can I disagree with 25 that for one small point? And that is, some of the</p>	<p style="text-align: right;">23</p> <p>1 practice. 2 MR. VONDRAK: Exactly. 3 MR. SUMMERLIN: Got you. 4 THE WITNESS: That's what I thought it was 5 coming in. But still I have to -- I -- I -- if I 6 see an ophthalmology case, if I see a -- I have to 7 go somewhere to get the information. And -- and 8 the amount of information out there boils down to 9 statistics. And what I'm seeing are bite wounds 10 and -- and killings and that type of thing. 11 MR. SUMMERLIN: Okay. 12 THE WITNESS: Yeah. 13 QUESTIONS BY MR. SUMMERLIN: 14 Q. So let's start off with that. From your clinical 15 experience, what information do you have? 16 A. From my clinical experience with pit bulls first 17 started back in the 1990s. There were not very 18 many pit bulls around. And I read about two pit 19 bulls attacking a woman in Indianapolis. With it 20 being a dog and an attack case, it kind of piqued 21 my interest. 22 And then I had several come in to my clinic. 23 One of them I remember very well, Susie, which is 24 just a beautiful, sweet, nice dog. There was 25 another owned by a Mr. Goldman. I believe it was a</p>
<p style="text-align: right;">22</p> <p>1 things I see in this here is mirrored in -- in the 2 medical practice -- 3 MR. SUMMERLIN: Sure. 4 THE WITNESS: -- that I see. 5 MR. SUMMERLIN: I understand. 6 THE WITNESS: The public health part. 7 MR. SUMMERLIN: Yeah. Got you. 8 (After a recess from 2:12 p.m. to 2:13 p.m., 9 the following proceedings were had:) 10 MR. VONDRAK: Back on the record? Okay. 11 We're back on the record. I'll just go on the 12 record to state that Mr. Skinner's testimony merely 13 is being offered for his 40-plus years of 14 experience in the real world of treating many, many 15 animals, many of which were pit bulls. I believe 16 Mr. Skinner has a wealth of knowledge from the 17 clinical side of that, and that is what his 18 testimony we will portray to show. 19 He is not here to testify that he has had any 20 training or any educational background regarding 21 genetic testing of pit bulls or anything along the 22 lines of the genomic testing of dogs. 23 MR. SUMMERLIN: So I'm -- he is solely going 24 to be talking about his own personal experience in 25 handling pit bull dogs as part of his veterinary</p>	<p style="text-align: right;">24</p> <p>1 Staffordshire Terrier. Nice dog, white dog. And 2 the man would dress up as George Patton and go to 3 the air shows with his white dog. White dog turned 4 on him and bit the hell out of him. That just kind 5 of awakened me a little bit more. 6 Then I had an Asian man who was supposed to 7 come in to the clinic. And he had two no-shows. 8 The next thing I know he's in the paper because the 9 city dog pound had confiscated his dog, and he 10 threatened to burn the place down and cut off the 11 manager's head. 12 And then the next incidence was a dog in the 13 parking lot that was a client of mine. And he had 14 a pit bull. And had people come in and complain 15 that they couldn't get out of their car because the 16 man was walking around with this dog intimidating 17 all of them. So it seemed to be a status thing. 18 And it seemed to be like something that I didn't 19 want in my clinic, neither the people nor the dogs. 20 So based on my computer, I could go in and 21 pick out pit bulls. And I sent all -- every pit 22 bull I had, which probably weren't very many, that 23 we will no longer see you. 24 Q. Okay. And so that was -- again, this is all taking 25 place sometime in the '90s?</p>

<p>25</p> <p>1 A. Yeah.</p> <p>2 Q. And if my notes are correct, you had the pit bull</p> <p>3 Susie that was a nice dog. You had the</p> <p>4 Staffordshire Terrier, that was a white dog, that</p> <p>5 ended up biting its owner.</p> <p>6 A. Severely, yeah.</p> <p>7 Q. Another client who had a pit bull and threatened to</p> <p>8 cut off the manager's head. And then a client that</p> <p>9 had a pit bull who used it to essentially threaten</p> <p>10 other people?</p> <p>11 A. Yeah. And on the Asian man, I remember him. But</p> <p>12 he had made two appointments; he never showed up.</p> <p>13 Q. Yeah.</p> <p>14 A. So he was never a client. But they just stuck</p> <p>15 out --</p> <p>16 Q. So --</p> <p>17 A. -- pretty strongly.</p> <p>18 Q. -- were those the only pit bulls that you treated</p> <p>19 as a -- as a veterinarian?</p> <p>20 A. Those were until I sold my practice in 2000.</p> <p>21 Q. Okay.</p> <p>22 A. And then, you know, the new boss came into town,</p> <p>23 and we did what they said. And I really didn't see</p> <p>24 that many pit bulls --</p> <p>25 Q. Okay.</p>	<p>27</p> <p>1 doing relief work. I was working different --</p> <p>2 different demographics.</p> <p>3 Q. Yeah.</p> <p>4 A. Rural, suburban, urban. And in that period of</p> <p>5 time, when I had left practice, the no-kill thing</p> <p>6 was coming up at that time. And now it just seems</p> <p>7 to be an explosion of them in the past six years.</p> <p>8 Q. Yeah. It's a breed that's grown in popularity --</p> <p>9 A. Yeah.</p> <p>10 Q. -- in your, I guess, geographic area where you --</p> <p>11 where you see animals?</p> <p>12 A. I'm sorry?</p> <p>13 Q. In your geographic area where you see animals.</p> <p>14 A. Areas.</p> <p>15 Q. Areas.</p> <p>16 A. Okay. Well --</p> <p>17 Q. Where do you practice?</p> <p>18 A. Well, primarily I'm in -- in Central Indiana. And</p> <p>19 I will do a rural community, and I will do a</p> <p>20 suburban community and an urban community in the</p> <p>21 Indianapolis area. One of them is even a -- then</p> <p>22 one is a rural community east of Indianapolis. And</p> <p>23 then one of them was up in the Mishawaka area,</p> <p>24 which is completely different demographics. All --</p> <p>25 all of them are different demographics.</p>
<p>26</p> <p>1 A. -- at that time.</p> <p>2 Q. Just over the course of your career could you</p> <p>3 estimate for me the number of pit bulls that you</p> <p>4 treated?</p> <p>5 A. Well, most of them have been in the last six years.</p> <p>6 Q. Okay.</p> <p>7 A. I've seen an explosion. And, once again, we're</p> <p>8 talking my identification. Okay?</p> <p>9 Q. Okay.</p> <p>10 A. Which I think is fairly accurate. And I would</p> <p>11 think probably 300. Sometimes if I work at certain</p> <p>12 clinics, I might see five a day that are mixes,</p> <p>13 pits or mixes.</p> <p>14 Q. Okay. You think total number 300?</p> <p>15 A. I'd say that would be minimum.</p> <p>16 Q. Oh, I'm sorry. Did I miss-hear you? Did you say a</p> <p>17 different number?</p> <p>18 A. I'd say 300 would probably be --</p> <p>19 Q. Okay.</p> <p>20 A. -- yeah, a minimum.</p> <p>21 Q. Okay.</p> <p>22 A. What happened was, when I sold my practice, or my</p> <p>23 last practice, I took a year off for medical</p> <p>24 reasons, cancer and that type of thing. And so</p> <p>25 when I came back to practice in two years, I was</p>	<p>28</p> <p>1 Q. All right. Of the animals that you've seen, do you</p> <p>2 know what percentage of those were purebred and</p> <p>3 registered --</p> <p>4 A. No.</p> <p>5 Q. -- the pit bull animals?</p> <p>6 A. No. They don't -- they don't bring the</p> <p>7 registration with them when they come.</p> <p>8 Q. Okay. And that's not something that you would --</p> <p>9 A. No.</p> <p>10 Q. -- typically ask.</p> <p>11 A. No. And there's UKC and there's AKC. And then</p> <p>12 there's the American Bulldog, which I think is only</p> <p>13 registered with the UKC. And so, no, we don't ask</p> <p>14 for registration.</p> <p>15 Q. Okay. When you use the term "pit bull," what</p> <p>16 breeds or mixes are you including within that</p> <p>17 designation?</p> <p>18 A. Well, first of all, like I say, pit bulls aren't</p> <p>19 the only breed that are a problem. Okay? But they</p> <p>20 seem to be predominant, what we're seeing now. And</p> <p>21 I would say that -- you know, I would say most of</p> <p>22 them are -- or go ahead and ask the question again</p> <p>23 'cause I --</p> <p>24 Q. Okay. When you use the term "pit bull" --</p> <p>25 A. Uh-huh.</p>

29

1 Q. -- what breeds --
2 A. Okay.
3 Q. -- or mixes are you including within that
4 designation?
5 A. I would say American Bulldog, Staffordshire
6 Terrier, American Staffordshire Terrier. And I
7 believe there's one that's actually called American
8 Pit Bull.
9 Q. Okay. And you've already testified you don't ask
10 the registration status --
11 A. No.
12 Q. -- of the animals that your clients bring in.
13 A. No.
14 Q. But based on your visual inspection of the dogs
15 that you've treated, these 300 --
16 A. Uh-huh.
17 Q. -- do you have a sense of what percentage of those
18 were mixed breeds versus what would appear to be
19 more --
20 A. I -- I would --
21 Q. -- purebred type?
22 A. -- I would think that most of them were mix.
23 Q. Okay.
24 A. The American Bulldog is one that stands out far
25 away from the others.

30

1 Q. Yeah. So are there -- what traits did you see in
2 the animals that -- the pit bull animals that you
3 provided clinical services to?
4 A. Well, a lot of them I saw -- if you looked at a
5 American Pit Bull, not the big ones that are bred
6 for big musculature, but the ones who weigh in the
7 45- to 55-pound range, they all had a sleek body.
8 They all had big jowls. They all had eyes that --
9 Q. I'm sorry. I didn't -- I didn't mean physical
10 traits.
11 A. Okay.
12 Q. I meant, like, where -- what behavior did you see
13 from those dogs?
14 A. Aggression.
15 Q. Okay. And tell me about that.
16 A. The aggression is -- is exhibited several different
17 ways. They'll either come up and push their --
18 their muzzle against your leg. Or if you want
19 to -- if you want to go to approach them, they turn
20 sideways and don't look at you, which is kind of
21 one of their traits, you know, of before they
22 attack. You don't know what they're gonna' do.
23 The other things would be growling. But
24 usually they didn't -- they did not say much. They
25 either pushed against you or they hid under chairs

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1 or they stood sideways. And then as you tried to
2 do things like put a leash around them, then they
3 start spinning and snapping. They up the game.
4 And I might mention that with these dogs come
5 owners, which I would like to talk about a little
6 bit.
7 Q. Okay. Were these traits -- so, you know, pushing
8 against you, hiding under a chair, standing
9 sideways --
10 A. Uh-huh.
11 Q. -- did every one of the 300 exhibit one or more of
12 those traits or --
13 A. I would say a significant number. I would -- we
14 don't like to see them come in.
15 I had one clinic I worked at. And she went to
16 put the dog up after he muzzled, put it up on the
17 table. And of course every demographics has
18 different staff. This particular staff member,
19 she's physical, very pretty. Just went to pick him
20 up on the table, and he started scratching and
21 clawed her right across the face. And she goes, I
22 wish I ran that f-ing shelter; I wouldn't adopt
23 these out to anybody. Nobody knows how to handle
24 them.
25 Q. Okay.

32

1 A. And that's -- I work at a clinic that,
2 que sera sera, they welcome the pit bulls. They
3 muzzle them but they welcome them. But they muzzle
4 them.
5 Q. Are these --
6 A. That you won't find in the stats.
7 Q. Are these traits traits that you see in other
8 breeds of dogs?
9 A. Not that near percentage, no.
10 Q. I'm sorry?
11 A. Not even close to that percent. In other words,
12 how many do we need to muzzle and how many give us
13 a hard time? And we try to go slow. But we have
14 to worry about getting bit ourselves or the staff
15 or the owner. Because those are a liability.
16 Q. Uh-huh.
17 A. You know, those are expensive things to handle. So
18 we have to err on the side of caution. Most of the
19 other dogs that we see -- I would think all the
20 other dogs combined are maybe half of what pits
21 are, maybe at the most. All the other breeds
22 combined give us as much trouble as the pits.
23 Q. Okay.
24 A. There would be clinics that don't have that. There
25 would be clinics that deny it. I've worked a lot

33

1 of them.

2 **Q. And then you said that there were owner issues as**

3 **well.**

4 A. Uh-huh.

5 **Q. So tell me about those.**

6 A. Owners' issues will revolve around three things.

7 They'll deny, they'll blame and they'll be

8 deceitful.

9 **Q. Okay.**

10 A. And that's where you -- when you have these

11 particular dogs that I think in my clinical

12 experience, and I've seen the trend, when I -- when

13 I see these dogs with these people, it's like a

14 perfect storm for something ready to happen.

15 The average dog owner does not know anything

16 about training a dog. Okay? They think they do.

17 Oh, I've raised -- I've been around dogs all my

18 life. Oh, he won't hurt you. Okay. They are

19 the -- they are not to be trusted. And I'm just

20 advising you of that personally. Just be careful.

21 What happens is they will come in and they

22 will say, He's -- he won't bite anybody; he's a

23 good dog. Not all of them are pets. I'm just

24 talking about owners now.

25 **Q. Uh-huh.**

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1 A. And one of them is a Saint Bernard. And I go in --

2 this is in the last year. And I look at the

3 record. And on the outside it said, Tried to bite

4 Dr. Vincent, who's a woman. And tried to do this,

5 must muzzle, be careful, all over the front of the

6 card. Okay?

7 So I go -- and I know what's gonna' happen;

8 it's not my first rodeo. So I go in and I go, Hi,

9 Mr. Whatever. How's Brutus today? Oh, he's fine.

10 I go, Are we going to have any trouble with him?

11 No, no, no; he loves people. I got the card.

12 Okay?

13 And so I said, Okay, that's fine. And I -- I

14 knew what was coming. I try to be polite, try to

15 see -- gradually work into, Why don't we muzzle

16 him. And I give the dog a chance to maybe do

17 something. All I say is, How are you today,

18 Brutus? And the dog leaps at me, jumps up. I'm --

19 the exam table is here. Jumps at me and is

20 snapping and biting at me. So I give the man an

21 education in -- in responsibility. We go ahead and

22 see the dog. And he's bound and determined that

23 that dog's a good dog, and he's gonna' be -- be

24 able to get a heartworm test on it and everything.

25 And so that's an instance.

35

1 I have another instance where I saw 110-pound

2 Mastiff on Saturday, I believe it was, 130-pound

3 one. And he was in a muzzle. Thank you very much,

4 sir; I appreciate that. That doesn't mean he's not

5 going to be nice when he goes home, but in my world

6 the man was responsible.

7 I saw 110-pound female, probably 45 minutes

8 later, very fearful, lowered her head, get in the

9 corner. You don't want to corner them. You know,

10 there's a sixth sense you develop. You can't

11 statistically put it. But in 45 years I've only

12 been bitten once, and that was by a kitten. Okay?

13 And I handled all the dogs because I don't want my

14 girl getting bit.

15 So what happens is, as I'm looking at the

16 dog -- I find out later -- the dog's fearful, and I

17 go out of the room. And the girl says the man had

18 a shock collar on it and was shocking it as I was

19 looking at it. It's idiot. It's idiot.

20 I had another one who told the staff, Make

21 sure the doctor knocks the pit bull -- make sure

22 the doctor knocks on the door before he comes in

23 because I'm afraid the dog will attack him. That's

24 not a way to live.

25 **Q. Right.**

36

1 A. It's not a way to practice. Reverse it with you.

2 You know, in your profession what would be, you

3 know, physical harm if you went in a room or

4 something. And maybe you have and it's not fun.

5 And that's the tip of the iceberg. Okay? Not

6 laying it all on pits. This part's owners and

7 owners don't know anything. Owners don't know

8 anything. If you want to have an owner train a

9 dog, get a good trainer. Who's a good trainer?

10 You know, America's been on a diet for

11 50 years, and they've gained 30 pounds. People

12 don't have the discipline to follow through with a

13 dog that comes out of a shelter, that's antisocial,

14 who doesn't have socialization skills, that has the

15 power and the jaws that some of these dogs have,

16 pit bull or whatever, and -- and be trusted to

17 train them.

18 It's -- it's -- you have to be dedicated, and

19 the dog and the owner both have to be motivated. I

20 don't know what motivates a dog. You know, you

21 can't talk to him. You can't communicate with him.

22 There's no dog whisperer. And so now what happens,

23 you have an awful lot of moving parts there.

24 Something's gonna' happen.

25 **Q. Okay. The -- so when you say, you know, we**

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1 identified three owner issues, deny, blame,
2 deceitful, are these owner issues that are just
3 related to pit bull owners? Or are these owner
4 issues generally, no matter what the breed?
5 A. I -- I see them across the board. But I see more
6 pits that have aggressive or fearful behavior. And
7 I see a lot of people making excuses for them;
8 that's where we come into denial.
9 Deceit was when the man was shocking the dog
10 as I was looking at it. And, you know, there's --
11 I -- I deal with it three or four times a day.
12 Cats or dogs or whatever. So, no, it's not -- I'm
13 not laying it all on pit bulls. But their owners
14 tend to be a bit more denial. It's like they have
15 a chip on their shoulder a little bit almost when
16 you question them about it.
17 Q. Okay. You've never been bitten by a pit bull?
18 A. Huh-uh.
19 Q. Have any of your staff?
20 A. I haven't been bit by anything. And I did -- and I
21 did all the work for 25 years. I would not let the
22 staff get any cat or dog out of a cage except me.
23 And, of course, back then, that first 25 years,
24 there weren't as many pit bulls. Okay? And we
25 didn't have technicians. So I handled all that so

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1 nobody would get bit. I didn't want anybody to get
2 bit.
3 When I sold and when I went into relief
4 practice, there were more veterinary technicians
5 who could do basic handling of cats and dog. The
6 pits came on the scene and I go, I'm not getting
7 bit. So I let them handle them. I let them get
8 scratched. That's their job. That's what they
9 went to school for is to handle the animals and
10 basically nursing and care.
11 And the -- when, 25 years ago, we -- we didn't
12 have the technicians.
13 Q. Okay. So other than what you've told me so far,
14 based on your personal experience of dealing with
15 pit bulls, are there any other things that --
16 A. There are other experiences. There are --
17 Q. -- that you plan to testify to?
18 A. I'm sorry?
19 Q. Other experiences that you plan to testify to?
20 A. Oh, no. I'm sorry. I interrupted you. No. Other
21 experiences that -- that I had with pit bulls, yes.
22 Q. Okay. So tell me about those.
23 A. Okay. And that would be on your notes. One is,
24 and this was in the last year, was an 18-week-old
25 pit bull that was biting and very viscous, very --

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1 very hard to handle. And I don't think we allowed
2 it to come back where I was working. Because it
3 was aggressive, trying to bite you. And there was
4 nothing we could do for it.
5 When -- when I had a -- a litter of ten Chows,
6 which is another breed that gets a wrap, at six
7 weeks of age -- and this kind of dispelling a
8 little bit, that that's how you raise them -- and
9 all -- every one of the ten tried to bite me at six
10 weeks of age.
11 We just had a -- 200 yards from where I worked
12 in one particular town where two pit bulls attacked
13 and killed a miniature horse -- this was, like, in
14 the last three weeks -- that was, I believe, taken
15 care of the veterinarian I work for, where I do
16 relief work.
17 We had a -- just had a recent neck injury of a
18 pit bull attacking a dog in the neck. I had an
19 open chest wound to die in front of the little girl
20 where the chest was just ripped open. That was,
21 you know, about 15 years ago.
22 I had another dog, pit bull -- this is just
23 like in the '90s when they were starting to come
24 around. And it attacked a dog that my clients were
25 walking. They were -- they were mentally slow

40

1 people. They weren't -- they're the ones we should
2 look after, the ones we should take care of. And
3 their dog got attacked by a pit bull. And I had to
4 clean it up and help them with the bill. And then
5 I went to the Town of Beech Grove and said, We need
6 to get that pit bull out of town, which they did.
7 And they enacted the vicious dog law, which is part
8 of Indianapolis.
9 I mentioned the Saint Bernard. Boy, I might
10 -- I might have to have you help me with some of
11 this reading.
12 Q. I think it's apartment letter below that?
13 A. Let's see here. Oh, yeah, yeah. I'm sorry, yeah.
14 I had summarized a bit in the back.
15 What we do is -- is we get a -- people coming
16 in and they want us to sign off that the dog
17 doesn't have pit bull in it. And on the form it
18 says, The apartment building assumes no liability
19 for this identification; the veterinarian does. So
20 what they're doing, they're coming in and trying to
21 get veterinarians to sign off that this is not a
22 pit bull or have any pit bull in it, leaving us --
23 Q. Uh-huh.
24 A. -- hanging. Once again, I'm going to err on the
25 side of caution. That's why, you know, I had one

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1 or two work comp claims in a couple -- in all those
2 years. I've had people -- dogs bite me. Basically
3 I thought he would bite is what they said. We had,
4 you know, a number of newspaper cases in the area.
5 **Q. Okay. I'm only interested in what you --**
6 A. When -- within --
7 **Q. -- personally know of.**
8 A. -- the clinic, within the clinic. I had a dog at
9 my house and stayed there for a while. It was part
10 pit bull; looked almost all pit bull. And I raise
11 German Short-Hair Pointers; they're German
12 Short-Hair Pointer mixes. I have German Short-Hair
13 Pointers that really have a lot of those traits.
14 He bit a neurosurgeon friend of mine on the
15 hand without warning. He attacked my dog's throat,
16 my German Short-Hair Pointer, without warning --
17 although there probably was a standoff -- and
18 grabbed him by the throat. And my wife could
19 barely get him to go. And then my wife took him
20 out to walk one day on the leash. He kept pulling
21 to the yard worker that was helping me like he
22 wanted to play and meet him. The guy bends down to
23 meet him, and he lunges at his face. My wife jerks
24 back just in time or he would have bit his face.
25 **Q. Okay.**

42

1 A. I've seen enough.
2 **Q. All right. And with those dogs that you've just**
3 **described --**
4 A. Uh-huh.
5 **Q. -- did you know the breed of the dog based on**
6 **genetic verification?**
7 A. I did not, no.
8 **Q. Just based on visual identification.**
9 A. Visual ID, yeah.
10 **Q. Okay.**
11 A. And there seemed to be a consistency. If you see
12 enough Chows, they look like Chows. If you see
13 enough Labradors -- if I'm -- if I'm allowed to
14 identify a Lab mix, I think I can be allowed to
15 identify a Pit mix based on my --
16 **Q. Yeah.**
17 A. -- think. And the reason why that's important,
18 because some breeds have certain anesthetic or
19 whatever qualities or -- or heart problems or
20 something like that that we need to look for.
21 **Q. Okay. And you feel confident in your ability -- in**
22 **your ability to identify had breeds of a**
23 **mixed-breed dog based --**
24 A. Not -- but I feel very comfortable. Because it
25 seems like phenotype, which is the way they look,

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1 versus genotype --
2 **Q. Right.**
3 A. Phenotype, of what I see, tends to correlate with
4 this action.
5 **Q. Okay.**
6 A. That's not saying they're all pit bulls I have
7 trouble with.
8 **Q. Right.**
9 A. Not saying that all pit bull owners I have trouble
10 with. But the owners of any dog, be it a pit bull
11 or anything that's an aggressive, unsocialized
12 breed, is an accident waiting to happen.
13 **Q. Okay. So when -- when you make a visual**
14 **identification of a dog's breed, recognizing that**
15 **you feel confident to do that --**
16 A. Uh-huh. Uh-huh.
17 **Q. Have you ever tested the accuracy of --**
18 A. No. No.
19 **Q. So you don't -- you don't know --**
20 A. We don't do DNA testing, no.
21 **Q. We can't talk at the same time.**
22 **Although you feel confident to identify a**
23 **dog's primary breed based on visual identification,**
24 **you've never tested whether you're actually correct**
25 **in that breed determination.**

44

1 A. I have not. But some of the owners put -- a large
2 majority of them put Pit or Pit mix on the
3 registration form when they sign in.
4 **Q. Okay. Okay. But, again, in terms of your**
5 **identification of the primary breed of a**
6 **mixed-breed dog, you've never said, Okay, I -- I**
7 **think it's this, and now I'm gonna' get a Wisdom**
8 **Panel test and see --**
9 A. No.
10 **Q. -- what is the actual genetic makeup of that dog?**
11 A. No. But the ones that I --
12 **Q. So answer that question first. Have you ever --**
13 A. No --
14 **Q. -- done that?**
15 A. -- no, I have not.
16 **Q. Okay. Now give me your explanation.**
17 A. What has -- the ones that come in that say they're
18 Pit or Pit mix, those are the ones that probably
19 are predominant number of those 30 -- of those 300
20 minimum.
21 **Q. Okay.**
22 A. Are owner signed.
23 **Q. Right. Owners identify the breed.**
24 A. Yeah. But I don't know that they're any better at
25 identifying than I am.

45

1 **Q. Right. Do you know where those dogs are coming**
2 **from? Are they shelter dogs? Are they rescue**
3 **dogs? Are they purchased?**
4 A. I'm seeing a lot more shelter dogs now. And there
5 are -- there are breeders in Indianapolis. And my
6 nephew is a law student and an insurance adjuster,
7 and also had a pit bull that just bought a -- bit a
8 lady in the face. And he had handled the case of
9 -- of a pit bull breeder. And -- and -- which I
10 wasn't aware there were that many in town.
11 But there are some pit bulls that are just,
12 like, mega huge. I don't see anything like that.
13 But they just almost seem like they're on steroids.
14 I think I got away if your question.
15 **Q. Yeah. Well, that's actually interesting though.**
16 **Are you -- so do they appear to be double muscled?**
17 A. Yeah. Almost like they're on steroids, almost.
18 **Q. Do you know what double muscling is as a genetic**
19 **condition?**
20 A. Well, it's a term that they use in weight lifters
21 and a term that they use in cattle.
22 **Q. Well, no. I'm -- I'm talking about the genetic**
23 **condition --**
24 A. No.
25 **Q. -- of double muscling.**

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1 A. No. No.
2 **Q. Okay. Are you aware of a breed of dogs that has**
3 **that genetic double-muscling condition --**
4 A. No, I do not.
5 **Q. -- that is a -- roughly looks like a pit bull?**
6 A. I do not.
7 **Q. Okay.**
8 A. No. They look like a dog that would have anabolic
9 steroids given to them.
10 **Q. That's exactly what they look like. Let' see.**
11 **Okay. Are there other examples of your personal**
12 **experience dealing with pit bulls that we haven't**
13 **talked about?**
14 A. Well, there's one I just mentioned there which was
15 my -- my nephew who adopted a what the shelter
16 called a pit bull mix. And I advised him against
17 it. And he got it. And within a week it got into
18 a fight with his mother's dog. And, once again,
19 denial. Well, they were fighting over food. Okay.
20 Food aggression. And then about two weeks later he
21 bit some woman in the face. And from what he told
22 me, you know, she filed a claim on his insurance.
23 And he continued to keep the dog.
24 See if there's any others here. I had the
25 neighbor dog. Did I mention that one, the American

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1 Bulldog come over?
2 **Q. Yeah.**
3 A. Okay. So that would be it -- that would be it on
4 the personal.
5 **Q. Based on your experience and as a -- as a**
6 **clinician, how important is owner behavior and**
7 **training of a dog to result in an animal that is**
8 **well socialized with humans?**
9 A. Well, the -- the only shot they have, and that
10 certainly is very important. But I think there's
11 nature and -- and there's nurture. And I don't
12 know that the -- even the above-average pet owner
13 is intelligent enough or dedicated enough or aware
14 enough to overcome anything with nature that might
15 be -- that might be aggressive tendencies.
16 I think that when -- I can give an example of
17 when I'm -- usually you do good dog as a reward.
18 And you're talking. And then so we're on the
19 table. The dog's on the table. And the dog's
20 growling; the dog's trying to bite us. And the
21 owner keeps going, Good dog, good dog. You know,
22 they don't know anything. They don't -- they --
23 not only do they not know anything, they don't try.
24 They're not gonna' go to class.
25 If they do go to class, there's all different

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1 kinds of dog trainers out there. Whether it's for
2 obedience or socialization or hunting or anything
3 like that. All kinds of trainers out there. And
4 -- and eventually you find a good one, which I did,
5 for a hunting dog. Eventually you find one. And
6 there's a lot of -- a lot of bad ones.
7 So I -- I think that if you even could get the
8 owner to the training class, then that's dependent
9 on how good the trainer is.
10 **Q. Okay. Are you familiar with the pit bull**
11 **population in Sioux City, Iowa?**
12 A. In where.
13 **Q. Sioux City, Iowa?**
14 A. No. I'm sorry. I didn't -- I honestly didn't --
15 **Q. No. I said, Are you familiar with the pit bull**
16 **population in Sioux City, Iowa?**
17 A. No.
18 **Q. Okay. And I take it that's true for both the pit**
19 **bull population prior to the enactment of their**
20 **breed-specific ban and after?**
21 A. I would not have that.
22 **Q. Okay. Have you ever personally observed or**
23 **interacted with any pit bulls in Sioux City, Iowa?**
24 A. No.
25 **Q. Okay. This is kind of out of left field here. But**

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1 based on your experience, do dog owners, or people
2 that are gonna' get a dog, tend to get a dog from,
3 you know, some geographic radius that's fairly
4 close to where they live?
5 A. It -- I get a lot of feedback on that. And if
6 they're pure breads, they go where the pure breads
7 are.
8 Q. Right.
9 A. Okay? And that's -- that's it. And if they are
10 shelter dogs, you know, which a lot of people now,
11 it's -- it's the promotion to get a shelter dog,
12 save a dog instead of getting a purebred. And --
13 and I've had both, and they're both nice. I
14 haven't had a shelter dog, but I've had a -- you
15 know, mutts. But I find that there are some number
16 of them that are looking for a particular type
17 dog --
18 Q. Sure.
19 A. -- that will -- and with the availability of the
20 internet might go to Louisville and get one. Or --
21 or they may just go local. There tends to seem to
22 be a little bit that they want the -- the boy look.
23 Q. Yeah. And I get it. You know, if I'm looking for
24 a specific kind of hunting dog, I may go to a
25 breeder that's done field trials and go wherever.

50

1 But for -- for someone looking for the average
2 family pet, mixed-breed family pet --
3 A. Well --
4 Q. -- are they -- are they going to tend to get that
5 dog locally?
6 A. They're going to tend to. But people buy dogs for,
7 like, four reasons. You know, hunting or use.
8 Okay? Protection, status and love.
9 And I -- I don't know how you can love a dog
10 online other than looking at its eyes. You know
11 what I mean, make you fall in love. I mean, I fell
12 in love two weeks ago with a dog that I just -- I
13 really wanted it. I just wanted that dog. And
14 they may -- that may catch them and they're willing
15 to drive that far for it. But I think most of them
16 are going to be local.
17 Q. Okay. And so there's no reason to think that the
18 specific lines of pit bull mixes that you see in
19 Central Indiana are gonna' be genetically the same
20 lines that you would see in --
21 A. Oh, they certainly could be. Yeah. Yeah. With
22 the no-kill shelters, they move them all over the
23 state, all over the country. Some of them from
24 Martinsville, Indiana were going out to Vermont or
25 Connecticut.

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1 Q. Okay.
2 A. So if the shelter gets full, they'll take them
3 wherever they -- wherever they've got room for
4 them.
5 Q. Are you aware of any dogs from -- pit bull mixes
6 from Central Indiana being sent to --
7 A. No. But I work with --
8 Q. -- Sioux City, Iowa?
9 A. No.
10 Q. Okay.
11 A. Sorry. I almost interrupted.
12 Q. All right. So -- and I think I may be about done
13 here.
14 A. Okay.
15 Q. I just want to make sure that I haven't
16 misunderstood anything that you've said.
17 Your personal knowledge about the behavior of
18 pit bulls and pit bull mixes is based on your
19 experience as a veterinarian since 19 -- well, you
20 said roughly --
21 A. Mid '90s.
22 Q. -- mid '90s is when you started seeing pit bulls.
23 And involves about 300 animals that you've treated.
24 A. Minimum.
25 Q. Okay. And for those animals that you've treated

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1 that you've identified as pit bull or pit bull
2 mixes, you don't know whether they're pure breads,
3 correct?
4 A. Correct.
5 Q. And you've never had them genetically tested to
6 determine their breed --
7 A. Correct.
8 Q. You've got to let me finish -- to determine their
9 breed makeup.
10 A. Correct.
11 Q. And I don't think I've asked you this. But other
12 than your interaction with those owners while
13 they're at the clinic, you don't know the
14 environment those dogs are kept in.
15 A. Most of them are house dogs --
16 Q. Okay.
17 A. -- they tell me. Or -- or fenced, most of them.
18 Q. Okay. And you found that among the group of owners
19 that own the pit bull mixes they tend to deny,
20 blame other things on their dog's behavior, and
21 they're deceitful.
22 A. I would say that's across the board for any dog
23 that's unsocial or aggressive.
24 Q. Okay.
25 A. Okay? He's never done that before. He doesn't

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1 like you, you know.
2 Among the pit bull owners I -- I think there
3 is a bit more of that because they may have a --
4 maybe think they have to explain themselves. You
5 know, you go out and buy a Kia, and your dad works
6 for GM, you've kind of got to defend yourself. And
7 some of them just won't hear that they're anything
8 but great.
9 And I tell you what, I've been around a pit
10 bull and he was fantastic. He was great. He was
11 loving. But I'd never let him get on the sofa with
12 me and get on top of me. I would never let him do
13 that. Okay? And there's just certain things
14 that -- there's a sixth sense about behavior. And
15 they're great dogs until they're not. And he was a
16 great dog until he bit a neurosurgeon on the hand.
17 He was a great dog until he grabbed my dog by the
18 throat. He was a great dog until he lunged at the
19 gardener.
20 **Q. Okay. What -- how did you end up with that dog?**
21 A. A client privilege. But it was my son's dog and --
22 and he came to live with us for a while.
23 **Q. Okay.**
24 MR. SUMMERLIN: I think that's all I've got.
25 THE WITNESS: Okay.

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1 MR. VONDRAK: I have no follow up.
2 (An off-the-record discussion was held.)
3 THE REPORTER: Signature?
4 MR. VONDRAK: Yes. You will have the
5 opportunity, Doctor, to review this deposition,
6 make any corrections or any changes --
7 THE WITNESS: Okay.
8 MR. VONDRAK: -- as you see fit. And then
9 have the ability to sign it.
10 THE WITNESS: Okay.
11 MR. VONDRAK: So I will get that to you for
12 your review.
13 THE WITNESS: And you depose me any today or
14 just -- just him?
15 MR. SUMMERLIN: Just me.
16 THE WITNESS: Okay.
17 THE REPORTER: Same orders as the other one?
18 MR. SUMMERLIN: Yes.
19 MR. VONDRAK: Yes.
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1 AND FURTHER DEPONENT SAITH NOT.
2 (2:55 p.m.)
3
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5 _____
6 DOUGLAS SKINNER, DVM
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1 STATE OF INDIANA)
2) SS:
3 COUNTY OF HAMILTON)
4
5 I, Lisa C. Pierce, a Notary Public in and for
6 the County of Hamilton, State of Indiana at large,
7 do hereby certify that DOUGLAS SKINNER, DVM, the
8 deponent herein, was by me first duly sworn to tell
9 the truth, the whole truth, and nothing but the
10 truth in the aforementioned matter;
11 That the foregoing deposition was taken on
12 behalf of the Plaintiffs at the Purdue University
13 Veterinary Pathology Building, 725 Harrison Street,
14 Room 109, West Lafayette, Tippecanoe County,
15 Indiana, on January 25, 2018, commencing at the
16 hour of 1:45 p.m., pursuant to Rules of Applicable
17 Procedure;
18 That said deposition was taken down in
19 stenographic notes and afterwards reduced to
20 typewriting under my direction, and that the
21 typewritten transcript is a true record of the
22 testimony given by said deponent; and thereafter
23 presented to said deponent for his signature;
24 That the parties were represented by their
25 aforementioned counsel.

1 I do further certify that I am a disinterested
2 person in this cause of action; that I am not a
3 relative or attorney of any party, or otherwise
4 interested in the event of this action, and am not
5 in the employ of the attorneys for any party.

6 IN WITNESS WHEREOF, I have hereunto set my
7 hand and affixed my notarial seal this ____ day of
8 _____, 2018.

11 *Lisa C. Pierce*

12 NOTARY PUBLIC

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16
17 My Commission Expires:
18 March 14, 2021

19 County of Residence:
20 Hamilton

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