

100 Received November 30 1993
Nona A. Bradshaw

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TRANSCRIPT OF PROCEEDINGS

CONFIDENTIAL - FOMA

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

IN THE MATTER OF:

MM DOCKET NO. 93-94

SCRIPPS HOWARD BROADCASTING COMPANY
and
FOUR JACKS BROADCASTING, INC
Baltimore, Maryland

DATE OF HEARING: November 16, 1992
PLACE OF HEARING: Washington, DC

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I N D E X

<u>Witness</u>	<u>Direct</u>	<u>Cross</u>	<u>Redirect</u>	<u>Recross</u>
Frederick Smith				
By Mr. Leader	1289		1378	
By Mr. Greenebaum		1290		

E X H I B I T S

<u>Scripps Howard</u>	<u>Identified</u>	<u>Received</u>	<u>Rejected</u>
No. 31	1286	1286	
No. 32	1364	1366	

25 Hearing began: 9:00 a.m. Hearing Ended: 12:10 p.m.

P R O C E E D I N G S

1
2 JUDGE SIPPEL: We're on the record. This is the
3 last day of the hearings, I suspect, and we're going to go
4 forward with your last witness this morning, Mr. Leader.

5 MR. LEADER: Thank you.

6 MR. HOWARD: Your Honor, may I, may I raise a
7 preliminary matter?

8 JUDGE SIPPEL: Yes, sir.

9 MR. HOWARD: It, it may take a minute, Mr. Leader.
10 The -- I would like to have marked for identification for
11 offer as evidence in this hearing the -- a document filed with
12 the Securities and Exchange Commission on November 9, 1993.
13 It's an amended version of the document that was accepted into
14 evidence yesterday. Mr. Smith made reference in his testimony
15 that a number of amendments to this registration statement had
16 been filed and Mr. Leader noted that they -- these changes may
17 be relevant to this proceeding. Scripps Howard also urges
18 this document was within the scope of the -- its document
19 production request and it believes that it is still within the
20 scope of its document production request No. 21. Yesterday
21 Scripps Howard obtained a copy of the latest version available
22 to the public at the Securities and Exchange Commission, and
23 upon review it's clear that this document does contain
24 relevant changes to this proceeding. For example, what were
25 earlier identified as investment considerations regarding the

1 | loss of the Smiths' services to the company had been upgra--
2 | had been changed to "risk factor" for the consideration of
3 | investors. In addition, the description of the financial
4 | effect required, required divestiture of station WBFF should
5 | Four Jacks be successful in obtaining this license, has now
6 | been identified as a separate risk factor with its own
7 | category rather than being subsumed under the heading of
8 | Conflict of Interest. Accordingly, based on David Smith's
9 | identification yesterday that these amendments exist, it's
10 | Scripps Howard's proffer that this document was obtained
11 | yesterday from the Securities and Exchange Commission.
12 | Scripps Howard will ask that this document be accepted into --
13 | and we ask that it be marked for identification as
14 | Exhibit No. 31 for Scripps Howard.

15 | JUDGE SIPPEL: Do you contemplate the who-- is it an
16 | S-1? It's a, it's a Form S-1, amended S-1?

17 | MR. HOWARD: Yes, Your Honor.

18 | JUDGE SIPPEL: Is it, is it as, as bulky as the one
19 | that came in yesterday?

20 | MR. HOWARD: I'm sorry to say that it is,
21 | Your Honor, but there are other materials, there are other
22 | changes, in it that I think the whole document would need to
23 | be -- I mean, we could identify those parts of it that are,
24 | are, well, particularly relevant.

25 | JUDGE SIPPEL: Well, let me, let me hear from

1 Mr. Leader first. Do you have any objection?

2 MR. LEADER: Ye-- I guess my object-- I have a
3 couple of con-- concerns or questions, and I guess I'd like to
4 know the relevance for which you're submitting the whole
5 document. It seems to me that, as I understood, your ruling
6 yesterday on the questioning, it was to go to the integration
7 and I -- it seems to me that the -- it is a bulky document,
8 that the -- Mr. Howard could submit the relevant portions on
9 which Mr. Greenebaum conducted his examination, and I, I don't
10 think -- I'm sorry Mr. Zauner isn't here to argue the -- to
11 object to the relevance or to the cluttering the record. I, I
12 don't think that -- it's a very long document. If he wants to
13 put the pages in that they conducted examination on, that's
14 fine. I just don't see that the rest of it is particularly
15 relevant to any of the issues here.

16 JUDGE SIPPEL: All right, well, yeah.

17 MR. HOWARD: May, may I respond?

18 JUDGE SIPPEL: But I, I, I tell you. You don't have
19 any objection in principle to this --

20 MR. LEADER: Why don't you just put, put it in. I
21 mean, that's a public document; it speaks for what it, you
22 know, it -- I just don't want them making findings on things
23 that aren't an issue here, I guess. But you -- that's your
24 responsibility.

25 JUDGE SIPPEL: That's my responsibility, right. I

1 want to see if you feel that you're going to be prejudiced in
2 any way by this information.

3 MR. LEADER: No, it's a public document.

4 JUDGE SIPPEL: All right.

5 MR. LEADER: So as far as I'm concerned --

6 JUDGE SIPPEL: All right, you, you -- and you
7 understand the limit, limited use that is going to be given to
8 it in this proceeding. You, you heard what I --

9 MR. LEADER: Well, let me just say this, that there
10 are things in this document that Mr. Greenebaum did not
11 mention that I'm going to rely on in our findings. He didn't
12 read the whole document. That's why if we put the whole
13 document in, that's fine.

14 JUDGE SIPPEL: All right, I'm not, I'm not
15 hesitating about getting the corrections in, no question about
16 that. The -- or the amendments or however you want to
17 characterize them. I'm just wondering whether we need the
18 whole document or whether we could do it -- there was really
19 only about a half a dozen pages that Mr. David Smith was
20 examined on, and if those are the pages that have the changes
21 it may be easy to just take the pages from the updated --

22 MR. GREENEBAUM: If it would be helpful, Your Honor,
23 I would be glad to go through the few changes with the witness
24 today, and maybe that would help the court, and then you could
25 decide at that time whether you want to let the whole document

1 in or just the pages. But the, you know, the record is going
2 to be this high. I don't see where it makes a big difference
3 whether another two inches are --

4 MR. LEADER: I agree. I agree with Mr. Greenebaum.

5 JUDGE SIPPEL: Well, it's -- that's true, and the,
6 the down side --

7 MR. GREENEBAUM: That's the first time we've ever
8 agreed, so I don't think the court has any option.

9 JUDGE SIPPEL: Well, that's what's -- that's why I'm
10 hesitating here. I'm used to making these rulings in a little
11 different context. This -- these, these, these document--
12 although it is voluminous, when you start excising materials,
13 it does get to be -- it can get to be a little bit, a little
14 bit dangerous in terms of leaving something out that should
15 have been there, or how much should be in and how much should
16 be out. Mr. Leader --

17 MR. LEADER: May we go off the record for a minute?

18 JUDGE SIPPEL: Sure. To talk about this?

19 MR. LEADER: Yes.

20 JUDGE SIPPEL: Let's go off the record.

21 (Whereupon, a brief recess was taken.)

22 JUDGE SIPPEL: All right, Mr. Howard, we're going to
23 receive this evidence in toto, in -- that is, the full
24 document, and it will be marked as Scripps Howard Exhibit No.,
25 No. 31 for identification.

1 (Whereupon, the document referred to
2 as Scripps Howard Exhibit No. 31 was
3 marked for identification.)

4 JUDGE SIPPEL: Does the reporter have two copies?

5 COURT REPORTER: Yes, Your Honor.

6 JUDGE SIPPEL: The reporter has two copies, and this
7 is identified as, what, S-- SEC Form S-1 Amendment, dated --
8 what date?

9 MR. HOWARD: It was filed November 9, 1993,
10 Your Honor.

11 JUDGE SIPPEL: 11/9/93, and it relates to Sinclair
12 Broadcast Group, Inc. That document has been marked for
13 identification as Scripps Howard 31, and there being no objec-
14 tion, it is received in evidence at this time as
15 Scripps Howard Exhibit 31.

16 (Whereupon, the document marked as
17 Scripps Howard Exhibit No. 31 was
18 received into evidence.)

19 JUDGE SIPPEL: Does anybody else have any more
20 preliminary, any -- another preliminary matter?

21 MR. LEADER: Yes, Your Honor.

22 JUDGE SIPPEL: Mr. Leader?

23 MR. LEADER: I would like to know how we handle
24 future iterations of this document.

25 JUDGE SIPPEL: Well, that's a -- what do you mean

1 "future iterations"?

2 MR. LEADER: Well, it's likely that this document
3 will be amended because the amendments are requested by the
4 Securities and Exchange Commission. It's not something that
5 the company voluntarily does and, I guess, I guess the
6 question is do you want me to submit future, you know, future
7 iterations or do you want to put the burden on Mr. Howard to
8 check with the SEC to make sure that the record is current? I
9 mean, if the purpose of putting this in is --

10 JUDGE SIPPEL: Yes --

11 MR. LEADER: -- to have the most recent document
12 before the court, and we know that this is a living document,
13 the question is how do you want -- how does the court want
14 future iterations handled?

15 JUDGE SIPPEL: Well --

16 MR. LEADER: I, I raise that now so that we don't
17 have a dispute later on.

18 JUDGE SIPPEL: Well, I will -- what I will do,
19 except for limited purposes of corrections to the transcript,
20 I will be closing the record and we'll be closing this case
21 down today. What I would require would be a motion to reopen
22 the record, and either see if you could do it jointly or
23 separately. I'm assuming that, you know, both parties will be
24 cognizant of what is going on at the SEC filings, and, you
25 know, recognizing again the limited purpose for which this

1 evidence is being used, it's up to you determine as to whether
2 or not -- when I say you, I mean collectively -- whether there
3 is something that has been filed that you think would be a
4 significant or a substantial fact that would focus on -- that
5 focuses on the, on the integration issue. That's the --
6 that's really what the test is about, because that's what I'm
7 going to grant the motion or deny the motion on. So if
8 they're just changing things back in the financial section,
9 that really doesn't bear on this so I'm not particularly int--
10 I'm not interested in that. I don't think anybody else will
11 be. All right, then, it's -- that concludes our preliminary
12 business this morning. Will -- Mr. Leader, will you call your
13 next witness, please?

14 MR. LEADER: Yes, sir. Fred Smith, please take the
15 witness stand.

16 JUDGE SIPPEL: Can you come forward, sir?
17 Dr. Smith?

18 MR. SMITH: Whatever.

19 JUDGE SIPPEL: Good morning, sir. Raise your right
20 hand, please?
21 Whereupon,

22 MR. FREDERICK G. SMITH
23 having first been duly sworn, was called as a witness herein
24 and was examined and testified as follows:

25 JUDGE SIPPEL: Please be seated.

1 MR. LEADER: Your Honor, I'd like the record to show
2 that we're giving the witness a copy of his testimony.

3 JUDGE SIPPEL: That would be at what tab of --

4 MR. LEADER: That is Tab --

5 JUDGE SIPPEL: Tab 4?

6 MR. LEADER: Tab 4, page --

7 JUDGE SIPPEL: Well, that's actually the Four Jacks
8 Exhibit 4, which is received in evidence.

9 DIRECT EXAMINATION

10 BY MR LEADER:

11 Q And I'd ask you Mr. -- Dr. Smith if there are any
12 additions or corrections you would like to make to your state-
13 ment?

14 A On page 5 in that section -- 1, 2, 3, 4 -- 5 lines
15 from the bottom, the sentence reads "Assistant treasurer,
16 director, and an 18.8 percent shareholder." It should be
17 18.75.

18 Q Are there any other corrections you would like to
19 make?

20 A No, not at this time.

21 MR. LEADER: Your Honor, Dr. Smith is available for
22 cross-examination.

23 JUDGE SIPPEL: All right. I'm going to ask the
24 witness to just state his full name and his current residence
25 address before cross-examination.

1 MR. SMITH: Full name is Frederick G. Smith, and my
2 address is 1109 Dulaney Gate Circle, Cockeysville, Maryland.

3 JUDGE SIPPEL: All right, Mr. Greenebaum?

4 MR. GREENEBAUM: Thank you, Your Honor.

5 CROSS EXAMINATION

6 BY MR. GREENEBAUM:

7 Q Good morning, Mr. Smith.

8 A Morning, counsel.

9 Q Mr. Smith, have you read or reviewed any documents
10 in preparation for your testimony today?

11 A I reviewed my diversification integration statement
12 and my deposition.

13 Q And have you been advised in any respect as to the
14 testimony that your brothers gave yesterday?

15 A No.

16 Q And at the present time, are you 44 years old?

17 A Yes, I am.

18 Q Or 45?

19 A I'm 44. Don't, don't make me any older, now.

20 Q You were born July 3, 1949?

21 A Yes.

22 Q And you went to high school at Boy, Boys Latin
23 School?

24 A Yes, sir.

25 Q And then you got a BA and MS in anatomy from West

1 Virginia in 1973 at age 24, is that correct?

2 A Well, the BA was actually in arts and sciences; the
3 MS was in anatomy.

4 Q Okay. And then you went to dental school at the
5 University of Maryland starting in 1974 at age 25?

6 A That sounds about correct.

7 Q You entered a residency in Michael Reese Hospital in
8 Chicago in 1978 to 1979 at ages 29 to 31?

9 A Correct.

10 Q And then you had 3 years surgical residency at Johns
11 Hopkins between the ages of 22 and 25?

12 A Correct. The age is not 22; it would be in the -- I
13 would be in the thirties.

14 Q 32, I apologize. Can't read my writing. And you
15 became board certified thereafter, did you not?

16 A Yes, sir.

17 Q In, in what, in what specialty did you become board
18 certified?

19 A Oral and maxillofacial surgery.

20 Q And what age were you when you, you accomplished
21 that achievement?

22 A Oh, I was in my thirties, late thirties, I guess.

23 Q And when did you begin practicing your specialty?

24 A Right after my residency. You're actually
25 practicing while you're a resident obviously, but after I

1 received my surgical certificate, then it was immediately
2 subsequent to that.

3 Q That was about at age 38?

4 A No, no. That would be about 33, something like
5 that.

6 Q When did you begin working full time at your dental
7 practice?

8 A About the same time, early thirties.

9 Q And with whom do you -- did you begin practicing
10 your specialty at that time?

11 A It was solo.

12 Q And did you eventually become associated or affili-
13 ated with a group practice?

14 A Well, they became affiliated with me.

15 Q And what is the name of that practice at the present
16 time?

17 A It's Frederick Smith, Michael J. Schwartz, DDS, PA,
18 I believe.

19 Q So these people came and joined your practice.

20 A Yes, sir.

21 Q And where is that located?

22 A Hunt Valley Medical Center, 10 Warren Road,
23 Cockeysville, Maryland.

24 Q And for what period of time did you practice your
25 specialty full time as an occupation or profession?

1 A I would say from the first day out of residency up
2 until about 3 or so years ago, maybe 3 1/2 years ago.

3 Q And in the last 3 years, you've characterized that
4 practice as a "hobby."

5 A Yeah, that's about right.

6 Q And when you were practicing full time, what were
7 your office hours?

8 A Five days a week, Saturdays sometimes; I'd say two
9 Saturdays a month.

10 Q And in -- you, you became involved working with
11 Sinclair at the request of your father, and I assume your
12 other enterprises, about 1990 or so, is that correct?

13 A Yes. Well, with respect to Sinclair as an employee,
14 that is correct.

15 Q Prior to that time you had done some work --

16 A Yes, sir.

17 Q -- off and on unpaid; you'd go over and help out on
18 occasion. That was erratic at best.

19 A That's correct.

20 Q Okay.

21 JUDGE SIPPPEL: What, what month in 1990 was that?

22 MR. SMITH: I would say middle of the year, June,
23 July or somewhere in there.

24 BY MR. GREENEBAUM:

25 Q I'll come back to that. I'm just trying to place

1 your situation. And what are your -- and as I understand it,
2 you're still practicing dentistry today, is that correct?

3 A That's correct.

4 Q And with the same group.

5 A That's correct.

6 Q And what office hours do you maintain at the present
7 time?

8 A I have a block of time allotted for me from --
9 Monday morning from 7:30 to 8:30; Monday evening from 6:00
10 until usually about 9:00; Wednesday from 7:30 to 8:30;
11 Thursday, 7:30 to 8:30; and Friday, about 8:00, 7:30, 8:00
12 until about 11:30.

13 Q Okay. And do you still have hospital privileges as
14 well?

15 A Yes, sir.

16 Q And am I correct that you have hospital privileges
17 at Johns Hopkins Hospital, Greater Baltimore Medical Center,
18 St. Joseph's Hospital, and St. Agnes Hospital?

19 A That's correct.

20 Q Now, to the extent that the -- you perform surgery
21 now, who, who covers the follow-up care? Especially if an
22 emergency were to arise outside of your professional hours.

23 A The assistant surgeon.

24 Q You don't follow up with the patients --

25 A Rarely.

1 Q -- by --

2 A I follow up with them in the office. Just dis-
3 charge --

4 Q I appreciate your trying to help but I'm sure that
5 Mr. Leader told you if he asked you questions to listen to
6 them and wait until he got through and then --

7 A Sorry.

8 Q Did you show me the same courtesy?

9 A Oh, I'm sorry.

10 MR. LEADER: I didn't tell him that.

11 MR. GREENEBAUM: All right, well, I'll tell him.

12 BY MR. GREENEBAUM:

13 Q Please -- (Laughter) -- no interrupting me. Do
14 you -- is that consistent with, with your obligations as a
15 surgeon?

16 A Is that your question?

17 Q Are you required to provide follow-up care as, as,
18 as -- especially in emergencies?

19 A Is that your question?

20 Q Yes.

21 A That's consistent.

22 Q And with what frequen-- well. And I take it that
23 during the middle of the day when you're not at your dental
24 practice, you're at the offices of Sinclair where all the
25 other entities are housed as well.

1 A Generally speaking.

2 Q And what are your offices there? I meant what are
3 your hours there?

4 A Generally speaking 9:00, 9:00 to 5:00-ish type of
5 hours, sometimes 9:00 to 7:00, sometimes 9:00 to 5:30, but
6 usually about 9 o'clock in the morning or so until about 5 on
7 average.

8 Q And in what capacity are you employed by Sinclair
9 Broadcast Group?

10 A I'm employed as a vice president, director, and
11 assistant treasurer.

12 Q Before I get to that, what professional societies,
13 if any, are you a member of?

14 A I am a member of the American Association of Oral
15 and Maxillofacial Surgeons, member of the Baltimore County
16 Dental Society, and I'm a member of the American College of
17 Oral and Maxillofacial Surgeons, primarily.

18 Q In your deposition at page 11, you were --

19 MR. LEADER: Do you have a copy for me, please?

20 MR. GREENEBAUM: Certainly. I, I don't think he
21 needs it. I just want to clarify.

22 MR. LEADER: Oh, all right.

23 MR. GREENEBAUM: Well, give it to him. Let, let's
24 give it to him.

25 JUDGE SIPPEL: Let's, yeah, let's get the

1 depositions distributed then. We'll go off the record for
2 just a minute.

3 (Whereupon, a brief recess was taken.)

4 JUDGE SIPPEL: Do you have your deposition with you,
5 Mr. Smith?

6 MR. SMITH: Yes, sir. Page 11.

7 BY MR. GREENEBAUM:

8 Q Would you turn to page 11, sir?

9 A Right.

10 Q And if, if you would just read to yourself from line
11 3 to -- well, let me ask -- line 3 to 14.

12 JUDGE SIPPEL: Let's go off the record while he
13 reads it and then you tell me when you're ready.

14 (Whereupon, a brief recess was taken.)

15 BY MR. GREENEBAUM:

16 Q Mr. Smith --

17 A Yes, sir.

18 Q -- in line 7 you talk about the American Society,
19 and in line -- I'm sorry, in line 7 you talk about the
20 American Association of Oral and Maxillofacial Surgeons, and
21 in line 12, the American Society of Oral and Maxillofacial
22 Surgeons. Are they the same organizations that you have just
23 mischaracterized or are they two different organizations?

24 A No, the, the -- line 7, the American Association of
25 Oral and Maxillofacial Surgeons is correct; line 12, it should

1 be the American College of Oral and Maxillofacial Surgeons.

2 So rather than "Society" that -- you should substitute

3 "College."

4 Q That's, that's what I thought. I just was confused
5 by it there. And you have from time to time in the past gone
6 to conventions or meetings of these three groups, is that
7 correct?

8 A Yes.

9 Q Now, what duties, if any, do you perform at Sinclair
10 in the capacity of the vice president?

11 A Well, I perform whatever is needed, number one.
12 Number two, I am recently working on the 401K retirement plan
13 just in the last few weeks, and also our health insurance
14 plan. Historically, I'll usually get involved with evaluating
15 the managers, and hiring and firing personnel, et cetera.

16 Q And what function do you perform at -- as a
17 director?

18 A Participate as a director.

19 Q How about as assistant treasurer?

20 A Participate as assistant treasurer.

21 Q And is it fair to say that at the present time you
22 are working approximately 40 hours a week at SBG, and 6 to 8
23 hours a week at your private practice?

24 A That's -- on the average, that's it.

25 Q How far would that stretch in any one direction?

1 MR. LEADER: Objection. I'm not sure what that
2 question means.

3 MR. GREENEBAUM: Well, he understands.

4 MR. LEADER: How far -- well, I'm not sure he does
5 understand.

6 JUDGE SIPPEL: Well, do have you got an objection to
7 the clarity of the question?

8 MR. LEADER: To the clarity. What does "how far
9 does that stretch" mean?

10 JUDGE SIPPEL: All right, all right, what -- do you
11 understand the question?

12 MR. SMITH: Define "stretch."

13 BY MR. GREENEBAUM:

14 Q Well, how, how many hours might you work at SBG?

15 MS. SCHMELTZER: He just answered that question.

16 MR. LEADER: He just did answer that question.

17 MR. GREENEBAUM: That's during the course of any
18 week. No, he said on the average, and now I'm trying to find
19 out whether the average goes up or down. That's what I meant
20 by "stretch."

21 MR. SMITH: Well, the average is the average. An
22 average doesn't go up or down.

23 BY MR. GREENEBAUM:

24 Q Then I'll ask you the most that you have worked at
25 SBG during any week in the last year or so.

1 A The most I've worked?

2 Q Yeah.

3 A Maybe 50 hours, 55 hours.

4 Q And what's the least you worked at SBG during any
5 week in the last year?

6 A Now, are you -- let me describe and co-author what
7 you're saying. Do you mean physically being there or actually
8 doing work? Now, I'd be at a convention for SBG or something
9 related to that, or be outside the building meeting people on
10 behalf of SBG --

11 Q We'll do it both ways. Let's talk about inside the
12 building.

13 A What about inside the building?

14 Q What's the least number of hours you've been inside
15 the building working at your job at Sinclair during any 1 week
16 during the last --

17 A Zero.

18 Q Is that, like, when you've been on vacation?

19 A No.

20 Q You just don't do go in some weeks.

21 A No.

22 Q How, how -- what has caused you to work 0 hours
23 during any week?

24 A I may have been at a convention of buyers with the
25 television station in San Diego or Florida, for instance.

1 Q And what's the most you've worked outside the
2 building in any 1 week during the last year?

3 A The most time? One week.

4 Q And how about the least? Outside the building
5 during the last --

6 A Right. What was the last section? I'm sorry.

7 Q What is the least you've worked outside the building
8 during any part --

9 MR. LEADER: May I object to that? Because I'm not
10 sure I understand the question.

11 MR. SMITH: I'm getting confused about the --

12 JUDGE SIPPEL: What, what, what is it that you don't
13 understand?

14 MR. SMITH: What does he --

15 JUDGE SIPPEL: Are you --

16 MR. SMITH: What does he mean "outside the
17 building"? I'm just regurgitating, restating --

18 MR. GREENEBAUM: It was your phrase, sir.

19 MR. SMITH: Right.

20 MR. LEADER: No, your phrase.

21 MR. GREENEBAUM: No.

22 MR. SMITH: No, I, I used that phrase but I'm, I'm,
23 I'm getting lost in the sequencing of time here. Let's go
24 back and --

25 BY MR. GREENEBAUM:

1 Q Well, I take it there's some weeks when you've
2 worked the entire week inside the building.

3 A Sure, right.

4 Q Okay, so the -- it's obvious, then, that you --
5 that --

6 A There are times when I'm outside the building which
7 we just reviewed.

8 Q Are there weeks when you work solely inside the
9 building and never outside the building?

10 A Yes.

11 Q And are there weeks when you work both inside the
12 building and outside the building?

13 A Absolutely.

14 Q And what would be the most time you spent in any one
15 week combining all of your efforts for S-- for Sinclair or the
16 other entities?

17 A I already answered that.

18 Q Seventy?

19 A No, I said 50, 55.

20 Q Incidentally, when you perform surgery at the
21 hospital, do you have to keep up the chart, and dictate notes,
22 and things like that? Do you do that?

23 A The dictation of the hospital surgical procedure is
24 done by my assistant, as well as the follow up generally, the
25 follow-up care of the patient. I will take care of the