

Exhibit A

Page 18

1 phone number for?
 2 A Twenty-five years.
 3 Q Okay. And then the next number on there is
 4 (805) 446-1973. What phone number is that?
 5 A That's the office phone number.
 6 Q When you say the office phone number, do you
 7 mean the phone number for the office Decision
 8 Diagnostics?
 9 A I didn't hear your question.
 10 Q I'm happy to repeat. When you say the office
 11 phone number, do you mean the phone number for Decision
 12 Diagnostics?
 13 A The third number on this list?
 14 Q I'm referring to the second number. So
 15 (805) --
 16 A That's an office phone number.
 17 Q Okay. So let me repeat the question because,
 18 obviously, we're making a written record here. The
 19 phone number (805) 446-1973, what phone number is that?
 20 A That's an office phone number.
 21 Q And is it an office phone number for Decision
 22 Diagnostics?
 23 A It is.
 24 Q Lastly, there's a phone number (805) 446-2973.
 25 Do you see that number?

Page 19

1 A I do.
 2 Q And what does that number -- what number is
 3 that used for?
 4 A That's an office phone number.
 5 Q Are either of those two phone numbers your
 6 direct line?
 7 A I have no direct line other than my cell
 8 phone.
 9 Q And so besides these three phone numbers that
 10 are listed on Division Exhibit 64, page 2, No. 8, have
 11 you used any other phone numbers to make or receive
 12 phone calls over the last eight months?
 13 A The office has several other numbers that are
 14 part of a rotary. The office also has a fax phone
 15 number.
 16 Q And have you used -- is it possible that
 17 you've used some of those numbers?
 18 A Yes, for outgoing calls. It is highly
 19 doubtful I received incoming calls to those numbers.
 20 Q And apart from these office phone numbers and
 21 the office fax number have you used any other cell phone
 22 numbers over the last eight months?
 23 A I have not.
 24 Q Do you have a landline at your home?
 25 A At my home?

Page 20

1 Q Yes.
 2 A I do.
 3 Q And over the last eight months have you used
 4 that phone?
 5 A Yes.
 6 Q What is that phone number?
 7 A (805) 497-4125.
 8 Q And besides your landline at your house have
 9 you used any own phone numbers besides the ones that we
 10 covered?
 11 A That's a very open-ended question. Did I
 12 borrow somebody else's cell phone? Probably. Did I
 13 make a call from a pay phone here or there? Probably.
 14 Q So Mr. Berman, it's your testimony that you
 15 may have made a call from a pay phone in the last eight
 16 months?
 17 A No. Probably not in the last eight months.
 18 Q And over the last eight months if you were to
 19 have made a call from somebody else's cell phone, whose
 20 cell phone would that have been?
 21 A I don't recall.
 22 Q Now same on Exhibit 64, page 2. I want to
 23 direct your attention to No. 10. Do you see that?
 24 A Yes.
 25 Q Now, on there, you've listed two email

Page 21

1 addresses that you regularly used over the last three
 2 years, and they are intermania@aol.com and
 3 kberman@decisiondiagnostics.net. Do you see that?
 4 A Yes.
 5 Q Do you have any other email accounts?
 6 A I do not.
 7 Q Does anyone have access to your -- either of
 8 these email accounts besides yourself?
 9 A You mean other than the major hack that
 10 occurred here at the business --
 11 MR. HERZOG: I think he means authorized --
 12 THE WITNESS: -- which is part of our 550
 13 argument?
 14 BY MR. MISLER:
 15 Q Mr. Berman, my question is have you provided
 16 access to either of your email accounts to anybody --
 17 A No.
 18 Q -- besides yourself?
 19 A No.
 20 Q Have you ever given your email account
 21 passwords to anybody?
 22 A No.
 23 Q On page 3 of Exhibit 64, No. 12, you were
 24 asked to list all internet message boards or discussion
 25 forums including but not limited to Money Maker Group,

Page 22

1 PNQI message board, Investors Hub Daily of which you are
 2 a member or on which you posted any messages at any time
 3 during the last three years. You left that blank. Do
 4 you see that?
 5 A Yeah. I've not been part of Money Maker, PNQI
 6 or Investors Hub Daily.
 7 Q And what about any other internet message
 8 boards or discussion forums? Have you posted anything
 9 to any others?
 10 A I'm just not going to talk about internet
 11 message board posting. My life has been made a living
 12 hell by message board posters. I'm just -- my car has
 13 been vandalized. The office has had windows broken. My
 14 son has been followed by message board posters. I'm
 15 just not going to talk about it.
 16 Q And that was not my question --
 17 A I know, but you're barking up the wrong tree,
 18 Mr. Mislser.
 19 Q My question to you us have you made any posts
 20 on any internet --
 21 A You have my answer.
 22 Q -- message board --
 23 A You have my answer.
 24 MR. MISLER: Mr. Berman -- I want the record
 25 to reflect that Mr. Berman is interrupting me and not

Page 23

1 answering the question. I'll ask it one more time.
 2 BY MR. MISLER:
 3 Q Mr. Berman, is it your testimony that you are
 4 not a member of any internet message boards or
 5 discussion forums?
 6 MR. MISLER: Let the record reflect that the
 7 witness has refused to answer the question.
 8 MR. HERZOG: He's answered it.
 9 THE WITNESS: You may not like the answer, but
 10 I answered it.
 11 MR. MISLER: He has refused to answer the
 12 question. He went on a long discourse that was
 13 unresponsive to the answer. I'm happy to move on at
 14 this point in time.
 15 THE WITNESS: And that is a self-serving
 16 comment.
 17 BY MR. MISLER:
 18 Q We're on page 8 of Exhibit 64, which describes
 19 your formal educational background. Mr. Berman, what
 20 type of degree did you obtain from St. Louis University?
 21 A No degree.
 22 Q You didn't obtain a degree?
 23 A Say that again.
 24 Q Do you have a Bachelor of Science and an
 25 M.B.A. from Indiana University Bloomington?

Page 24

1 A I do.
 2 Q Have you obtained any other degrees?
 3 A No.
 4 Q Do you have any other formal education?
 5 A No.
 6 Q Do you have any science or medical training?
 7 A Lots of it.
 8 Q And can you please explain to us your science
 9 training?
 10 A I've worked at companies that are -- that are
 11 and were in the in vitro diagnostics field off and on
 12 mostly on for 40 years, 40-plus years. And my job was
 13 as a new products program manager where we developed
 14 major in vitro diagnostic products not that different
 15 than what we do here at Pharma Tech Solutions, and along
 16 the way you learn an awful lot in 40 years. You deal
 17 constantly with science, scientists, engineers. I
 18 managed those people. I hired those people, and I
 19 launched those products.
 20 Q And apart from observing those individuals
 21 over your career do you have any formal science
 22 training?
 23 MR. HERZOG: Objection to the form. He didn't
 24 say he observed them.
 25 BY MR. MISLER:

Page 25

1 Q You can answer, Mr. Berman.
 2 A Let's move on.
 3 Q No. I asked you a question. Apart from what
 4 you described in your answer do you have any formal
 5 science training?
 6 A I listed that as well.
 7 Q Have you taken any science courses apart from
 8 your course work at Indiana University and St. Louis
 9 University?
 10 A I did not.
 11 Q Have you taken any medical courses apart from
 12 your course work at Indiana University and St. Louis
 13 University?
 14 A I did not.
 15 Q Do you have any formal medical training?
 16 A No.
 17 Q Do you have any specific training related to
 18 virology?
 19 A No.
 20 Q Have you ever received any specific training
 21 related to the detection of viruses?
 22 A Yes.
 23 Q Can you please describe your specific training
 24 that you've received relating to the detection of
 25 viruses?