

DEPOSITION OF SEBASTIAN LATTUGA, M.D.

1 Q. Let's see. Let's go down.

2 Dr. Lattuga joins New York Legislature to
3 shadow insurance practices; did you write that
4 sir?

5 A. I mean, I didn't personally write it.
6 It might have been written by the Web people,
7 you know, we used the Web-based advertising.

8 Q. Okay.

9 A. But, I didn't personally write this.

10 MR. PARIS: Would you like to read
11 into the record the rest of the
12 document?

13 MS. RUSH: Oh, believe me.

14 MR. PARIS: Okay.

15 I'm happy to have you read it into
16 the record the part about the bill and,
17 ah, the shadow insurance fraud against
18 insurance companies.

19 MS. RUSH: And, just like I asked
20 Dr. Lattuga about the claims against
21 him for insurance fraud.

22 Q. So, Dr. Lattuga, do you consider
23 yourself a renounced spine specialist and
24 advocate for injured workers?

25 A. I mean, I'm certainly an advocate for

DEPOSITION OF SEBASTIAN LATTUGA, M.D.

1 patients.

2 Q. Okay. So, in other words, you have a
3 financial interest in doing it, and you are an
4 advocate on their behalf?

5 A. I mean, I object to the
6 characterization, the same way you are getting
7 paid an hourly rate to do this Deposition, you
8 get paid for this work, is the same way I get
9 paid for a consultation and surgery.

10 Q. Not quite, doctor.

11 A. I think it is exactly the same, ma'am.
12 I wouldn't part any difference.

13 Q. I don't think I make a hundred thousand
14 dollars a hour.

15 A. I asked the question --

16 MR. PARIS: Hold on. Hold on.

17 I'm going to put a stop to this
18 just as the Judge would.

19 The two of you can have any
20 conversation you want, on who makes
21 more money on the back of somebody
22 else.

23 But, let's try to accommodate our
24 Reporter to finish the Deposition.

25 Q. So, do you consider yourself, sir, a

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1 renounced spinal surgeon?

2 A. It is a self-serving statement, ma'am.

3 I've had a great career. I helped thousands
4 of people feel better.

5 However you characterize that as renounced
6 I'll take it as characterizing it that way.

7 Q. And, yet you had 27 malpractice cases,
8 sir?

9 MR. PARIS: Objection.

10 Asked and answered.

11 Doctor, there is no reason to
12 answer that question.

13 Q. Doctor, then, let me ask you this then,
14 renounced surgeon, renounced practice, how come
15 so many of your patient's don't get better?

16 MR. PARIS: Objection.

17 CONTINUED EXAMINATION BY

18 MS. RUSH:

19 Q. How come your medical patients don't
20 get better, how is that?

21 A. You have characterized me in a
22 malicious fashion.

23 You are attacking me, questioning my
24 credibility and my career.

25 MR. PARIS: Doctor, I know you

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1 want to defend yourself, it is not
2 necessary, you'll have the opportunity
3 to do so at Trial if she attacks you in
4 front of the Jury.

5 And, if the Judge allows that line
6 of questioning.

7 We don't need to waste our Court
8 Reporter's time of the two of you
9 fighting and bickering.

10 MS. RUSH: I'm not bickering with
11 anyone.

12 MR. PARIS: I would have liked to
13 ask question and put up Ms. Rush's
14 Biography from her Website and ask the
15 doctor questions about that.

16 But, out of respect for you, Ms.
17 Reporter, I wouldn't do that.

18 Claire, are you done with the
19 doctor?

20 MS. RUSH: Yes, I'm done for now.

21 MR. PARIS: Okay.

22 Are you done with the doctor,
23 James?

24 MR. WHELAN: One more question,
25 okay?

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1 I think I've been pretty concise.

2 RE-DIRECT EXAMINATION BY

3 MR. WHELAN:

4 Q. Doctor, would it be fair to say that
5 with regards to the mechanism of injury, the
6 happening of the accident, you relied on what Ms.
7 Moldovan told you, correct?

8 A. Correct.

9 MR. WHELAN: That's all.

10 MR. PARIS: No further questions
11 for Mr. Whelan.

12 Ms. Rush, any further questions?

13 Ms. Rush any further questions?

14 MS. RUSH: Take care.

15 MR. PARIS: Any further questions?

16 MS. RUSH: I have no further
17 questions other than I want to mark the
18 Exhibits so that it is clear for the
19 record going on.

20 And, obviously, I want copies of
21 the lien assignment, and of any
22 ancillary, ah documents, ah, regarding
23 the interest rate on the lien.

24 MR. PARIS: And, I think as I
25 said, if you make a Discovery Demand,

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1 we will bring that up with the Judge
2 next week.

3 You can logoff, Dr. Lattuga, the
4 Deposition is over.

5 Thank you very much, have a nice
6 weekend.

7 Madam Reporter, if you can provide
8 us with your E-mail address, Ms. Rush
9 can send you the Exhibits that has been
10 marked and, then, returned and, then,
11 we can all be on our way.

12 Thank you.

13

14 (TIME NOTED: 1:00 P.M.)

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DEPOSITION OF SEBASTIAN LATTUGA, M.D.

1 DECLARATION UNDER PENALTY OF PERJURY

2

3 STATE OF NEW YORK)
4) ss:
5 COUNTY OF NASSAU)

6

7 I, SEBASTIAN LATTUGA, M.D., hereby certify that
8 I have read the transcript of my testimony taken
9 under oath in my deposition of January 9, 2026;
10 that the transcript is a true, complete and correct
11 record of my testimony; and that the answers on the
12 record as given by me are true and correct.

13

14 _____
15 SEBASTIAN LATTUGA, M.D.

16

17

18

19 Signed and subscribed to
20 before me, this ____ day
21 of _____, 202 ____

22

23 _____
24 Notary Public, State of New York

25

26

27

DEPOSITION OF SEBASTIAN LATTUGA, M.D.

1 I N D E X T O E X H I B I T S

2

3 WITNESS
SEBASTIAN LATTUGA, M.D.,

4

EXAMINATION BY	PAGE
Ms. Rush	4, 66
Mr. Whelan	49, 75

6

7

8 E X H I B I T S

9 MARKED	DESCRIPTION	PAGE
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10 Exhibit A	Document	27
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11 Exhibit B	Document	27
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12 Exhibit C	Document	74
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13 Exhibit D	Document (electronic)	
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14 Exhibit E	Document	
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17

18 DOCUMENTS AND/OR INFORMATION REQUESTED

19 DESCRIPTION	PAGE
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Request records for lien assignment	34
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Produce percentage amount	45
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Request ancillary documents	74
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21

22 QUESTIONS MARKED FOR A RULING

23 PAGE	LINE
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24 (NONE)

25

DEPOSITION OF SEBASTIAN LATTUGA, M.D.

C E R T I F I C A T E

STATE OF NEW YORK)
) ss:
COUNTY OF KINGS)

I, Larvon Black, a Certified Shorthand Reporter, do
hereby certify:

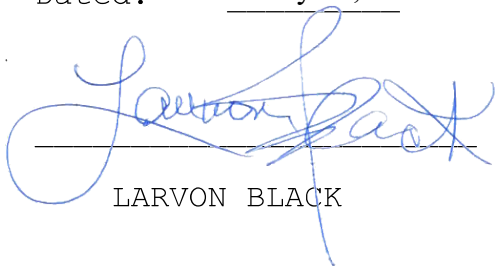
That prior to being examined, the witness in the
foregoing proceedings was by me duly sworn to
testify to the truth, the whole truth, and nothing
but the truth;

That said proceedings were taken remotely before me
at the time and places therein set forth and were
taken down by me in shorthand and thereafter
transcribed into typewriting under my direction and
supervision;

I further certify that I am neither counsel for,
nor related to, any party to said proceedings, not
in anywise interested in the outcome thereof.

In witness whereof, I have hereunto subscribed my
name.

Dated: January 13, 2026



LARVON BLACK

DEPOSITION OF SEBASTIAN LATTUGA, M.D.

1	DEPOSITION ERRATA SHEET	
2	Page No. _____	Line No. _____
3	Change: _____	
4	Reason for change: _____	
5	Page No. _____	Line No. _____
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24	_____	_____
25	Name of witness	Dated