

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

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

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

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?

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,

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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## 1 DECLARATION UNDER PENALTY OF PERJURY

2

3 STATE OF NEW YORK )  
4 COUNTY OF NASSAU ) ss:  
56 I, SEBASTIAN LATTUGA, M.D., hereby certify that  
7 I have read the transcript of my testimony taken  
8 under oath in my deposition of January 9, 2026;  
9 that the transcript is a true, complete and correct  
10 record of my testimony; and that the answers on the  
11 record as given by me are true and correct.

12

13

14 SEBASTIAN LATTUGA, M.D.

15

16

17 Signed and subscribed to  
18 before me, this \_\_\_\_ day  
19 of \_\_\_\_\_, 202 \_\_\_\_

20

21

22 Notary Public, State of New York

23

24

25

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

2

3        WITNESS

4        SEBASTIAN LATTUGA, M.D.,

5        EXAMINATION BY

6        Ms. Rush

7        Mr. Whelan

PAGE

4, 66

49, 75

6

7

8                   E X H I B I T S

9        MARKED                   DESCRIPTION                   PAGE

10      Exhibit A                Document                   27

11      Exhibit B                Document                   27

12      Exhibit C                Document                   74

13      Exhibit D                Document (electronic)

14      Exhibit E                Document

15

16

17      DOCUMENTS AND/OR INFORMATION REQUESTED

18

19      DESCRIPTION                           PAGE

20      Request records for lien assignment                34

21      Produce percentage amount                        45

22      Request ancillary documents                        74

21

22      QUESTIONS MARKED FOR A RULING

23                   PAGE                   LINE

24                   (NONE)

25

1

## C E R T I F I C A T E

2

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

4

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

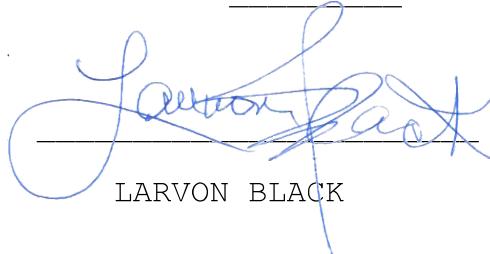
7 That prior to being examined, the witness in the  
8 foregoing proceedings was by me duly sworn to  
9 testify to the truth, the whole truth, and nothing  
10 but the truth;

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

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

19 In witness whereof, I have hereunto subscribed my  
20 name.

21 Dated: January 13, 2026

22   
23 \_\_\_\_\_  
24 LARVON BLACK  
25

## 1 DEPOSITION ERRATA SHEET

2 Page No. \_\_\_\_\_ Line No. \_\_\_\_\_

3 Change: \_\_\_\_\_

4 Reason for change: \_\_\_\_\_

5 Page No. \_\_\_\_\_ Line No. \_\_\_\_\_

6 Change: \_\_\_\_\_

7 Reason for change: \_\_\_\_\_

8 Page No. \_\_\_\_\_ Line No. \_\_\_\_\_

9 Change: \_\_\_\_\_

10 Reason for change: \_\_\_\_\_

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12 Change: \_\_\_\_\_

13 Reason for change: \_\_\_\_\_

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18 Change: \_\_\_\_\_

19 Reason for change: \_\_\_\_\_

20 Page No. \_\_\_\_\_ Line No. \_\_\_\_\_

21 Change: \_\_\_\_\_

22 Reason for change: \_\_\_\_\_

23

24 \_\_\_\_\_

25 Name of witness

Dated