

1 MS. ANDREWS: I'm going to object.

2 MR. BALLIN: Let me finish my
3 question, and then she can object, Judge. I
4 wasn't finished with the question.

5 THE COURT: Let the Counsel finish
6 his question then before you answer. I'll allow
7 the objection to stand so I can hear argument
8 and make a ruling. Go ahead, please, sir, and
9 finish your question.

10 BY MR. BALLIN:

11 Q. Did you ask any personnel to
12 fabricate information on any autopsies that your
13 office was performing?

14 MS. ANDREWS: Judge, I'm going to
15 object to this, unless we can show that there's
16 some good faith basis for these questions.

17 MR. BALLIN: It's my understanding,
18 Your Honor, that she was fired as the Harris
19 County medical examiner as a result of just
20 those issues that I'm addressing. Specifically,
21 two -- that I'm aware of -- two specific
22 incidences where whistle blower lawsuits were
23 filed against Dr. Carter because she fired them
24 for failure to follow her instructions to

1 fabricate information.

2 THE COURT: Okay. I'll allow it.
3 Overrule the objection.

4 BY MR. BALLIN:

5 Q. You were fired as the medical
6 examiner?

7 A. I absolutely was not fired as the
8 chief medical examiner of Harris County, Texas.

9 Q. Did you, at any time, ask individuals
10 to fabricate information on autopsies?

11 A. Absolutely not.

*12 Q. Was any disciplinary action taken as
13 a result of these issues?

14 A. No.

15 Q. Have you ever been not qualified as
16 an expert while attempting to be qualified?

17 A. Never.

18 MR. BALLIN: That's all, Judge.

19 THE COURT: Okay. I'll accept the
20 witness of Dr. Joye Carter then as an expert in
21 forensic pathology to testify as an expert in
22 that field.

23 MS. ANDREWS: Thank you, Judge.

24 DIRECT EXAMINATION