

# Pavel, Jesse 2022-06-17

## Designation List Report



Pavel, Jesse

2022-06-17

[Plaintiff Affirmatives](#)

00:07:45

---

**TOTAL RUN TIME**

**00:07:45**



Documents linked to video:

P23

P97

SHARMA-2


**PAVE - Pavel, Jesse 2022-06-17**

DESIGNATION	SOURCE	DURATION	ID
7:03 - 7:21	<b>Pavel, Jesse 2022-06-17</b>	00:00:33	PAVE.1
	7:03 Q. Good morning, Mr. Pavel. As		
	7:04 I said just a minute ago, my name is		
	7:05 Monique Alarcon. I represent Jeffrey		
	7:06 Thelen. How are you this morning?		
	7:07 A. Good. Thank you.		
	7:08 Q. Good. I know you have had		
	7:09 your deposition taken before. Would it		
	7:10 be okay if I just say the standard		
	7:11 admonitions that we typically would go		
	7:12 over?		
	7:13 A. Yes.		
	7:14 Q. I just ask that if you don't		
	7:15 understand my question or if you need		
	7:16 me to repeat myself, just let me know.		
	7:17 If you answer, I am going to assume you		
	7:18 understood it and you were able to give		
	7:19 me an accurate answer here today. Is		
	7:20 that fair?		
	7:21 A. Yes.		
8:03 - 8:10	<b>Pavel, Jesse 2022-06-17</b>	00:00:11	PAVE.2
	8:03 Do you understand you're		
	8:04 under oath and your testimony is given		
	8:05 under penalty of perjury?		
	8:06 A. Yes.		
	8:07 Q. Is there any reason at all		
	8:08 you're not able to give me your best		
	8:09 testimony today?		
	8:10 A. No.		
9:22 - 10:04	<b>Pavel, Jesse 2022-06-17</b>	00:00:15	PAVE.3
	9:22 Q. Mr. Pavel, what is your		
	9:23 occupation?		
	9:24 A. I am president of		
	10:01 Elekrika.		
	10:02 Q. How long have you held that		
	10:03 position?		
	10:04 A. Almost 20 years.		
10:05 - 10:20	<b>Pavel, Jesse 2022-06-17</b>	00:00:30	PAVE.4
	10:05 Q. You said a moment ago your		

**PAVE - Pavel, Jesse 2022-06-17**

DESIGNATION	SOURCE	DURATION	ID
	10:06 address is 149 Amityville Street, Islip		
	10:07 Terrace, New York.		
	10:08 A. That's correct.		
	10:09 Q. This trial is taking place in		
	10:10 Florida, just to Orient the jury. Is		
	10:11 that Long Island?		
	10:12 A. It is.		
	10:13 Q. What is Elekrika's business		
	10:14 address?		
	10:15 A. It is also 149 Amityville		
	10:16 Street.		
	10:17 Q. Elekrika is registered as a		
	10:18 business within the State of New York,		
	10:19 right?		
	10:20 A. Yes.		
11:22 - 13:17	<b>Pavel, Jesse 2022-06-17</b>	00:01:57	PAVE.5
	11:22 Q. How would you describe what		
	11:23 type of company Elekrika is?		
	11:24 A. I would, in an informal		
	12:01 setting, describe it as a medical		
	12:02 device contractor, manufacturing		
	12:03 contractor.		
	12:04 Q. What type of medical devices		
	12:05 does Elekrika manufacture?		
	12:06 A. We work with -- sorry. Did		
	12:07 someone say something? It must be my		
	12:08 feedback. We manufacture or build		
	12:09 parts of Somatics' ECT device.		
	12:10 Q. If we say ECT throughout the		
	12:11 course of this deposition, do you		
	12:12 understand that to mean		
	12:13 electroconvulsive therapy?		
	12:14 A. I do.		
	12:15 Q. 149 Amityville Street is both		
	12:16 the business address of Elekrika and		
	12:17 it's also your personal residence,		
	12:18 correct?		
	12:19 A. Correct.		
	12:20 Q. Elekrika does not have a		
	12:21 separate office from your residence; is		

PAVE - Pavel, Jesse 2022-06-17




DESIGNATION	SOURCE	DURATION	ID
	12:22 that right?		
	12:23 A. Correct.		
	12:24 Q. Elekrika operates out of the		
	13:01 basement of 149 Amityville Street; is		
	13:02 that true?		
	13:03 A. Yes.		
	13:04 Q. When was Elekrika first		
	13:05 established as a corporation?		
	13:06 A. I believe it was 1984.		
	13:07 Q. You became president of		
	13:08 Elekrika in 2003; do I have that		
	13:09 right?		
	13:10 A. Yes.		
	13:11 Q. Prior to you becoming		
	13:12 president, who was the president of		
	13:13 Elekrika?		
	13:14 A. John Pavel.		
	13:15 Q. Is he the founder of		
	13:16 Elekrika?		
	13:17 A. Yes.		
13:24 - 14:04	<b>Pavel, Jesse 2022-06-17</b>	00:00:11	PAVE.6
 P97.1	13:24 Q. Is this photo that I am		
	14:01 depicting on the screen an accurate		
	14:02 photo of 149 Amityville Street, Islip		
	14:03 Terrace, New York?		
 Clear	14:04 A. It is.		
14:17 - 15:12	<b>Pavel, Jesse 2022-06-17</b>	00:01:03	PAVE.7
 SHARMA-2.1	14:17 Q. I'm showing you what I		
 SHARMA-2.1.1	14:18 understand to be the original chart of		
	14:19 Elekrika's corporate structure; is		
	14:20 that accurate?		
	14:21 A. It is not. I recall		
	14:22 producing this for your discovery, but		
	14:23 it was an old chart.		
 SHARMA-2.1.2	14:24 Q. Okay. So does this represent		
	15:01 what Elekrika's corporate structure		
	15:02 was at some point?		
	15:03 A. I believe it does.		
	15:04 Q. Can you explain when this		
	15:05 structure changed or maybe when -- why		

PAVE - Pavel, Jesse 2022-06-17

DESIGNATION	SOURCE	DURATION	ID
	15:06 don't you tell me go through and tell 15:07 me what the differences are with the 15:08 current position. 15:09 A. John Pavel is not there. And 15:10 it is me and George Pavel. Enza 15:11 Lanitti works as a contractor that we 15:12 contract with.		
16:02 - 16:13	<b>Pavel, Jesse 2022-06-17</b> 16:02 A. So I am manager, and George 16:03 is technician. 16:04 Q. Is that it? 16:05 A. Yes. 16:06 Q. So there is no formal, I 16:07 guess, role for engineer, quality 16:08 assurance manager, or manufacturing 16:09 manager? 16:10 A. No. 16:11 Q. Is there an assembler? 16:12 A. Not within the organization. 16:13 We contract for assembly.	00:00:36	PAVE.8
18:06 - 18:09	<b>Pavel, Jesse 2022-06-17</b> 18:06 Q. Elekrika has enjoyed a 18:07 exclusive and successful business 18:08 relationship with Somatics, LLC since 18:09 2003, true?	00:00:07	PAVE.9
18:13 - 18:23	<b>Pavel, Jesse 2022-06-17</b> 18:13 A. I believe so. Can I just 18:14 clarify what I mean? 18:15 Q. Sure. 18:16 A. I know that we sell only to 18:17 them, but I don't know that they are 18:18 exclusively buying from us. 18:19 Q. Okay. And Elekrika has sold 18:20 exclusively to Somatics since 1983, 18:21 right? 18:22 A. I don't know before my time. 18:23 I would presume so.	00:00:35	PAVE.10
18:24 - 19:22	<b>Pavel, Jesse 2022-06-17</b> 18:24 Q. I'm showing you another	00:00:57	PAVE.11

 P23.1


PAVE - Pavel, Jesse 2022-06-17

DESIGNATION	SOURCE	DURATION	ID
	19:01 document here on my screen, and for 19:02 purposes of this, I am only showing you 19:03 the first page here. 19:04 A. Yes. I recognize it. 19:05 Q. What is this document? 19:06 A. It was produced to me at my 19:07 first deposition, which was when I 19:08 first saw it as an agreement between 19:09 Elekrika and Somatics. 19:10 Q. Focusing on the first where 19:11 as here. 19:12 A. Yes. 19:13 Q. I'm just going to read along 19:14 here. "Whereas Elekrika and Somatics 19:15 have enjoyed an exclusive and 19:16 successful business relationship since 19:17 1983." Do you see that? 19:18 A. Yes. 19:19 Q. Did I read that right? 19:20 A. You did. 19:21 Q. Do you have any reason to 19:22 believe that that is not accurate?		
 P23.1.2			
 P23.1.1			
 Clear			
20:02 - 20:03	<b>Pavel, Jesse 2022-06-17</b> 20:02 A. I don't have reason to 20:03 believe it's inaccurate.	00:00:03	PAVE.12
23:09 - 23:13	<b>Pavel, Jesse 2022-06-17</b> 23:09 Q. What other medical devices 23:10 has Elekrika manufactured in the 38 23:11 years that it's been in business? 23:12 A. I can only speak for my time, 23:13 and that would be no others.	00:00:17	PAVE.13
26:19 - 26:22	<b>Pavel, Jesse 2022-06-17</b> 26:19 Q. Elekrika has never performed 26:20 any human clinical trials concerning 26:21 any of the ECT devices it manufactures, 26:22 true?	00:00:08	PAVE.14
27:01 - 27:05	<b>Pavel, Jesse 2022-06-17</b> 27:01 A. True. 27:02 Q. And Elekrika has never	00:00:09	PAVE.15

**PAVE - Pavel, Jesse 2022-06-17**

DESIGNATION	SOURCE	DURATION	ID
	27:03 performed any animal clinical trials		
	27:04 concerning any of the ECT it		
	27:05 manufactures; is that right?		
27:08 - 27:11	<b>Pavel, Jesse 2022-06-17</b>	00:00:11	PAVE.16
	27:08 A. Correct.		
	27:09 Q. Elekrika has never done any		
	27:10 observational studies concerning any of		
	27:11 the ECT devices it manufactures, right?		
27:16 - 27:16	<b>Pavel, Jesse 2022-06-17</b>	00:00:01	PAVE.17
	27:16 A. Correct.		

<u>Plaintiff Affirmatives</u>	<u>00:07:45</u>
<b>TOTAL RUN TIME</b>	<b>00:07:45</b>

-  Documents linked to video:
- P23
  - P97
  - SHARMA-2