

COMMISSION OF INQUIRY
ON HORMONE RECEPTOR TESTING

BEFORE THE HONOURABLE JUSTICE CAMERON - COMMISSIONER

June 17, 2008

Appearances:

- Bernard Coffey, Q.C. Commission Co-counsel
- Sandra Chaytor, Q.C. Commission Co-counsel
- Rolf Pritchard/Stephen Mills Her Majesty in Right of NL
- Jane Hennebury Doctors Kara Laing et al
- Daniel Simmons Eastern Regional Integrated
. Health Authority
- Pamela Taylor Members of the Breast Cancer
. Testing Class Action
- Mark Pike NL Medical Association
- Jennifer Newbury Canadian Cancer Society (NL Division)
- Blair Pritchett/
- Stacey O’Dea. Central, Western and Labrador-Grenfell
Regional Integrated Health Authorities

1 COMMISSIONER:
2 Q. Please be seated. Ms. Chaytor.
3 CHAYTOR, Q.C.:
4 Q. Good morning, Commissioner.
5 COMMISSIONER:
6 Q. Good morning.
7 CHAYTOR, Q.C.:
8 Q. Commissioner, before we get started this
9 morning, there’s a serious item of business.
10 Our learned friend, Mark Pike, is 50 years old
11 today. Happy Birthday, Mark.
12 MR. PIKE:
13 Q. I’d just like to say I hope my life is half
14 over.
15 COMMISSIONER:
16 Q. Enjoy the day, Mr. Pike.
17 MR. PIKE:
18 Q. Thank you, very much.
19 COMMISSIONER:
20 Q. If that’s the word. We’re most delighted you
21 decided to spend it with us as opposed to
22 doing other things, but maybe the golf course
23 is cloudy still, is it?
24 MR. PIKE:
25 Q. People are finding out about it. Thank you

TABLE OF CONTENTS

- MS. TANSY MUNDON - RESUMES THE STAND
- Examination by Sandra Chaytor, Q.C. Pgs. 3 - 370
- Certificate

1 very much. Thank you.
2 CHAYTOR, Q.C.:
3 Q. Happy Birthday.
4 MR. PIKE:
5 Q. Thank you.
6 MS. TANSY MUNDON, EXAMINATION BY SANDRA CHAYTOR, Q.C.
7 (CONTINUED)
8 CHAYTOR, Q.C.:
9 Q. Ms. Mundon, good morning.
10 MS. MUNDON:
11 A. Good morning.
12 CHAYTOR, Q.C.:
13 Q. If we could have, please, P-0173? Ms. Mundon,
14 I meant to take you to this yesterday, so it’s
15 a little bit out of the chronology, but this
16 is the October 19th, 2006 e-mail that you
17 forwarded to Mr. Abbott, Ms. Hennessey, Mr.
18 Hynes and the minister. And it’s regarding a
19 CBC news item where 41 have joined the class
20 action bid on faulty breast cancer tests. So
21 at this point in time you’re forwarding on a
22 media item regarding the class action, in
23 October of 2006. Was there any discussion in
24 the department following that about the class
25 action?

Page 5

1 MS. MUNDON:
 2 A. Not that I can recall, no.
 3 CHAYTOR, Q.C.:
 4 Q. Do you recall at any point while you were
 5 there that the issue of the class action was
 6 discussed?
 7 MS. MUNDON:
 8 A. Just in general terms, the fact that there was
 9 a class action suit ongoing, but nothing
 10 specific that I remember.
 11 CHAYTOR, Q.C.:
 12 Q. And I believe when we finished up yesterday I
 13 had just asked you about the December 4th
 14 meeting with Ms. Bonnell and Mr. Tilley, Mr.
 15 Abbott and yourself.
 16 MS. MUNDON:
 17 A. Um-hm.
 18 CHAYTOR, Q.C.:
 19 Q. And you had--you were interested in having
 20 that meeting because of communications issues
 21 that you were having with Ms. Bonnell. You
 22 had also indicated in your evidence yesterday
 23 at some point in time you had discussed those
 24 issues informally with Ms. Matthews?
 25 MS. MUNDON:

Page 6

1 A. Yes.
 2 CHAYTOR, Q.C.:
 3 Q. And what point in time did that discussion
 4 take place?
 5 MS. MUNDON:
 6 A. I think it would have been around the same
 7 time, like, prior to my conversation, prior to
 8 the meeting but certainly around the same time
 9 that it was brought to the deputy minister's
 10 attention.
 11 CHAYTOR, Q.C.:
 12 Q. Okay. And then after the meeting you went
 13 back to the minister and told the minister
 14 that you were still dissatisfied with the
 15 outcome, that you hadn't seemed to make--it
 16 didn't seem to make any progress through the
 17 meeting. Did you also go back to Ms. Matthews
 18 and discuss it further with her?
 19 MS. MUNDON:
 20 A. No, I did not.
 21 CHAYTOR, Q.C.:
 22 Q. Okay. And why not?
 23 MS. MUNDON:
 24 A. Just because I felt that the deputy minister,
 25 who was my direct supervisor, was in the

Page 7

1 meeting that we had and I had also brought it
 2 to the minister's attention and I had accepted
 3 it for what it was, the outcome.
 4 CHAYTOR, Q.C.:
 5 Q. Okay. Leading up then to, we know the media
 6 technical briefing takes place on December
 7 11th, leading up to that after the meeting on
 8 December 4th, did you have any discussions
 9 with Ms. Bonnell from December 4th to December
 10 11th?
 11 MS. MUNDON:
 12 A. I can't recall any discussions that I would
 13 have had with her.
 14 CHAYTOR, Q.C.:
 15 Q. Were you asked for any input in terms of the
 16 technical briefing?
 17 MS. MUNDON:
 18 A. No, I was not.
 19 CHAYTOR, Q.C.:
 20 Q. Did you feel at that point in time that your
 21 input would have been welcomed?
 22 MS. MUNDON:
 23 A. No.
 24 CHAYTOR, Q.C.:
 25 Q. If we could look, please, at P-0104? Ms.

Page 8

1 Mundon, this is an e-mail from Ms. Bonnell to
 2 yourself on the morning of Monday, December
 3 11th, 2006, 8:52 in the morning. And this is
 4 where she forwards to you the documents that
 5 Eastern Health has prepared for the media
 6 briefing.
 7 MS. MUNDON:
 8 A. Um-hm.
 9 CHAYTOR, Q.C.:
 10 Q. And do you recall receiving those documents on
 11 the morning of December 11th?
 12 MS. MUNDON:
 13 A. Yes, I would have recalled receiving them and
 14 forwarding them on to officials within the
 15 department.
 16 CHAYTOR, Q.C.:
 17 Q. Okay. And did you yourself read the
 18 documents?
 19 MS. MUNDON:
 20 A. I can't recall if I read all of them. I think
 21 there were 16 pages all together. I would
 22 have been busy getting the minister ready for
 23 the house that morning, so I likely wouldn't
 24 have read the full 16 pages, but would have
 25 taken a quick glance at the, probably the

Page 9

1 first two pages, which would be the news
 2 release and the key messages document.
 3 CHAYTOR, Q.C.:
 4 Q. Okay. So you would have concentrated on the
 5 news release and the key messages?
 6 MS. MUNDON:
 7 A. Yes.
 8 CHAYTOR, Q.C.:
 9 Q. So if we just look at the, this is the embargo
 10 news release. You would have read that?
 11 MS. MUNDON:
 12 A. Um-hm.
 13 CHAYTOR, Q.C.:
 14 Q. Or concentrated on that. And the key messages
 15 -
 16 MS. MUNDON:
 17 A. They were back right -
 18 CHAYTOR, Q.C.:
 19 Q. At the beginning?
 20 MS. MUNDON:
 21 A. Yes, following the news release.
 22 CHAYTOR, Q.C.:
 23 Q. So this is what you -
 24 MS. MUNDON:
 25 A. Yes.

Page 10

1 CHAYTOR, Q.C.:
 2 Q. On page 6, this is the key messages?
 3 MS. MUNDON:
 4 A. Yes.
 5 CHAYTOR, Q.C.:
 6 Q. Okay. And there's also a Q and A document.
 7 Would you have been--would you have looked at
 8 that?
 9 MS. MUNDON:
 10 A. I don't recall going through the Q and A
 11 document, and given that they were lengthy, I
 12 probably wouldn't have had time to go through
 13 them that morning.
 14 CHAYTOR, Q.C.:
 15 Q. Okay. And when, if ever, then, did you read
 16 the entire document?
 17 MS. MUNDON:
 18 A. I can't recall when I would have read the
 19 entire document. I know that when I put that
 20 binder, as I mentioned yesterday, the binder
 21 together for the minister in the spring of
 22 2007, that I would have reviewed the materials
 23 at that point in time.
 24 CHAYTOR, Q.C.:
 25 Q. So even after the briefing on the 11th, you

Page 11

1 didn't read through this document?
 2 MS. MUNDON:
 3 A. I can't recall if I would have read through
 4 that or not.
 5 CHAYTOR, Q.C.:
 6 Q. Given that you'd been having issues with
 7 communications and feeling that there was
 8 information not forthcoming to you, do you
 9 think it's likely that you would have taken
 10 the time to read this document?
 11 MS. MUNDON:
 12 A. Given the fact that we had the briefing with
 13 the minister, Eastern Health had the briefing
 14 with the minister on November 23rd and had
 15 outlined in that meeting that they would be
 16 disclosing all the information, I would have
 17 just been trusting to the fact that they would
 18 be disclosing that information. I would have
 19 reviewed the news release. I would have just
 20 looked at the materials from a very-level
 21 perspective knowing that they were managing
 22 the issue and I wouldn't have been looking at
 23 them from the lens of them not planning to
 24 disclose.
 25 CHAYTOR, Q.C.:

Page 12

1 Q. But that meeting with the minister was
 2 November 23rd?
 3 MS. MUNDON:
 4 A. Yes.
 5 CHAYTOR, Q.C.:
 6 Q. Your concerns with the lack of disclosure,
 7 lack of information forthcoming from Eastern
 8 Health continued after that meeting to the
 9 point where you had the December 4th meeting.
 10 MS. MUNDON:
 11 A. Um-hm.
 12 CHAYTOR, Q.C.:
 13 Q. So given that that was what was happening from
 14 your point of view, for a communications point
 15 of view, do you think it's likely--you've now
 16 gotten, you know, several pages here, 20 pages
 17 or so, you were given one page on November
 18 23rd, so if you were--if your complaint was
 19 that you weren't receiving documentation or
 20 information, do you think it's likely then you
 21 would have read this document?
 22 MS. MUNDON:
 23 A. I can't say for certain if I would have read
 24 the Q and A document. Again, the meeting,
 25 those were my concerns and we did have the

Page 13

1 meeting on December 4th, however my concerns
 2 were not addressed at that meeting and it was,
 3 the message was reiterated to me that Eastern
 4 Health is managing this issue.
 5 CHAYTOR, Q.C.:
 6 Q. And who reiterated that to you?
 7 MS. MUNDON:
 8 A. I certainly felt that message from both Mr.
 9 Tilley and Mr. Abbott.
 10 CHAYTOR, Q.C.:
 11 Q. And, Ms. Mundon, how is it that it was being
 12 perceived that you were trying to manage the
 13 issue? I understood what you told the
 14 Commissioner yesterday that you were looking
 15 at this from a communications point of view
 16 and trying to get information from a
 17 communications point of view?
 18 MS. MUNDON:
 19 A. That's correct. However, Eastern Health also
 20 has their own communications team.
 21 CHAYTOR, Q.C.:
 22 Q. Yes.
 23 MS. MUNDON:
 24 A. Down there, and the message that I received
 25 was that, at that meeting, was basically that

Page 14

1 they were, Eastern Health was managing the
 2 issue and that from a communications
 3 perspective, again, they were trying to keep
 4 each other in the loop and that if the
 5 department wasn't satisfied with the
 6 information it was receiving, then perhaps
 7 they should send an individual from the
 8 department down to Eastern Health.
 9 CHAYTOR, Q.C.:
 10 Q. Okay. When Mr. Tilley said that, did you
 11 perceive that to be said with a degree of
 12 sarcasm?
 13 MS. MUNDON:
 14 A. I don't recall he was specifically coming out
 15 and saying those exact words, however, that
 16 was certainly the message that I received
 17 from--are you referring to -
 18 CHAYTOR, Q.C.:
 19 Q. When he said -
 20 MS. MUNDON:
 21 A. Oh, the -
 22 CHAYTOR, Q.C.:
 23 Q. - bring someone down yourself.
 24 MS. MUNDON:
 25 A. Oh, okay, sorry.

Page 15

1 CHAYTOR, Q.C.:
 2 Q. Like, was that a serious offer or how was that
 3 said?
 4 MS. MUNDON:
 5 A. I guess it could have been perceived to be a
 6 serious offer.
 7 CHAYTOR, Q.C.:
 8 Q. Okay. Or was he annoyed? How did you take
 9 it?
 10 MS. MUNDON:
 11 A. I was surprised by the comment.
 12 CHAYTOR, Q.C.:
 13 Q. Yes. If we could look at page 30 of this
 14 document, please?
 15 COMMISSIONER:
 16 Q. Before you go on to that, there was just one
 17 thing you had said a little earlier in your
 18 explanation and I just wanted--I wasn't sure I
 19 heard you correctly, so I just want to make
 20 sure. And that was an answer to a question
 21 from Ms. Chaytor in which she was talking
 22 about what of this document you had read.
 23 MS. MUNDON:
 24 A. Um-hm.
 25 COMMISSIONER:

Page 16

1 Q. And you were explaining that, as I understand
 2 it, you would have read, at least when you got
 3 it initially that day, the news release and
 4 the key messages?
 5 MS. MUNDON:
 6 A. Yes.
 7 COMMISSIONER:
 8 Q. And that you were busy doing other things in
 9 respect of preparing the minister for the
 10 house, as I understood it?
 11 MS. MUNDON:
 12 A. Yes.
 13 COMMISSIONER:
 14 Q. And that you probably would not have read
 15 those, the balance of the documents, at least
 16 not at that point?
 17 MS. MUNDON:
 18 A. Correct.
 19 COMMISSIONER:
 20 Q. And you went on to say that given that fact
 21 that Eastern Health at the meeting in November
 22 23rd had provided information, and did you say
 23 had undertaken to disclose? Did I hear you
 24 correctly, is that what you said?
 25 MS. MUNDON:

Page 17

1 A. And the--yes. Well, the impression that we
 2 all had leaving that meeting was that they
 3 would be disclosing all of the numbers.
 4 COMMISSIONER:
 5 Q. Well, okay. So that was an impression you had
 6 as opposed to somebody stating, we are going
 7 to provide these numbers? See my difficulty
 8 here? I'm just wondering whether or not you
 9 are recalling from that meeting a specific
 10 statement made by somebody from Eastern Health
 11 to the effect that these numbers would become
 12 public or is it what you're recalling is your
 13 impression coming out of the meeting?
 14 MS. MUNDON:
 15 A. It was clearly my understanding leaving the
 16 meeting, Madam Commissioner, that these
 17 numbers would be released. I can't recall
 18 specifically if somebody came out and made
 19 that exact statement that this sheet will be
 20 released, but that was certainly my impression
 21 leaving that meeting.
 22 COMMISSIONER:
 23 Q. Sorry, Ms. Chaytor.
 24 CHAYTOR, Q.C.:
 25 Q. No, thank you. Sorry, if we could go back to

Page 18

1 page 4 of the document? And you received this
 2 from Ms. Bonnell before 9:00 in the morning.
 3 This is the news release that you would have
 4 read down through then?
 5 MS. MUNDON:
 6 A. Um-hm.
 7 CHAYTOR, Q.C.:
 8 Q. And we'll see here where there's reference in
 9 the second paragraph, quotes attributed to Dr.
 10 Oscar Howell. He indicates, "In the review
 11 period from 1997 to 2005, 2760 ER/PR tests
 12 were conducted by our laboratory. 939 of
 13 those test results were originally negative.
 14 These test samples were sent to Mount Sinai in
 15 Toronto for review. In the majority of cases
 16 the patient's treatment was confirmed
 17 appropriate. However, 117 patients have been
 18 identified as requiring treatment changes by a
 19 panel of oncologists, pathologists and
 20 surgeons." And that's it for the news
 21 release. There's certainly no indication of
 22 the people--the other numbers that would have
 23 been on the sheet given to you on November
 24 23rd, there's no indication of the deceased
 25 numbers, there's no indication of the patients

Page 19

1 with overall number of changed results?
 2 MS. MUNDON:
 3 A. That's correct. However, I wouldn't expect
 4 for all of those numbers, because I believe
 5 there may be 20 or 30 numbers on that sheet, I
 6 would never expect for all those numbers to be
 7 outlined in a news release.
 8 CHAYTOR, Q.C.:
 9 Q. But in terms of the total numbers, for
 10 example, the total number of test results are
 11 here, sorry, total number of tests conducted,
 12 the total number, at that point in time that
 13 they thought were original negatives, that
 14 number is given, the total number of patients
 15 at that point in time that were found to
 16 require treatment change. So the total number
 17 of deceased aren't there, the total number of
 18 patients with changed results, so those couple
 19 of numbers certainly aren't there?
 20 MS. MUNDON:
 21 A. No, but the numbers that are there are the
 22 numbers that they focused on verbally in the
 23 briefing.
 24 CHAYTOR, Q.C.:
 25 Q. Yes.

Page 20

1 MS. MUNDON:
 2 A. You know, being the 2760 and 117, you know,
 3 and I would have recalled, of course, the
 4 three percent that they referenced back at
 5 that time. So when I would have been looking
 6 at this, it would have been consistent to what
 7 they had verbally focused on in that briefing.
 8 CHAYTOR, Q.C.:
 9 Q. And by verbally focusing on it in the briefing
 10 on November 23rd, were they indicating to you
 11 that that is the information that will be
 12 going forward to the public?
 13 MS. MUNDON:
 14 A. No, that certainly was not my impression
 15 leaving the meeting. My impression was that
 16 all of the numbers would be provided.
 17 CHAYTOR, Q.C.:
 18 Q. And then the other document at page 6 that you
 19 would have read, again, under the "Results",
 20 it refers to "117 patients have had
 21 recommended treatment changes." And I can't
 22 see any other number, Ms. Mundon, reference
 23 there?
 24 MS. MUNDON:
 25 A. No. And again, these would be their high-

Page 21

1 level key messages. Again, they wouldn't
 2 necessarily put all of these numbers in their
 3 key messages.
 4 COMMISSIONER:
 5 Q. So in what document would one have expected to
 6 see these numbers?
 7 MS. MUNDON:
 8 A. I would have expected for them, Madam
 9 Commissioner, to have handed out a similar
 10 type sheet or to have the individuals, medical
 11 experts that were there at the briefing to
 12 give a breakdown of those numbers at the
 13 briefing.
 14 CHAYTOR, Q.C.:
 15 Q. Now Ms. Mundon, back on, I believe it was,
 16 November 22nd when Ms. O'Neil-Yates contacted
 17 you, what she was indicating as being the key
 18 interests to the people affected was what went
 19 wrong and how many people had changed results
 20 and the error rate was actually used, and in
 21 terms of the key messages here, do you see
 22 either of those issues addressed?
 23 MS. MUNDON:
 24 A. No, I don't.
 25 CHAYTOR, Q.C.:

Page 22

1 Q. So in reading this, you would have realized
 2 that at least in their key messages and what
 3 they're going to tell, they have not addressed
 4 the two points that Chris O'Neil-Yates was
 5 looking for and had indicated that the people
 6 would be interested in knowing about?
 7 MS. MUNDON:
 8 A. Again, Ms. Chaytor, when I was reading these
 9 materials, you know, I would have read them
 10 that morning. They would have been sent to me
 11 as final drafts prepared by the authority. I
 12 would have taken a quick look at these two
 13 documents. I wouldn't have been--I wouldn't
 14 have had the e-mail from Ms. O'Neil-Yates in
 15 front of me and I certainly wouldn't be doing
 16 a comparing and contrasting those two
 17 documents.
 18 CHAYTOR, Q.C.:
 19 Q. So at that point in time that would be in your
 20 mind in terms of what had been indicated to
 21 you to be of relevance by Ms. O'Neil-Yates?
 22 MS. MUNDON:
 23 A. What would have been in my mind that day was
 24 knowing that Eastern Health was now going to
 25 go out to the public in a media briefing with

Page 23

1 officials there to explain to the media the
 2 numbers. What would have been in my mind was
 3 that they were now going to follow through on
 4 this, as per the meeting that we had with the
 5 Minister on November 23rd. I certainly
 6 trusted the fact that they were going to do
 7 what the Minister felt that they were--or
 8 understood that they were going to do, which
 9 would be disclose all the information. I
 10 wasn't looking at it with a critical lens or
 11 with a doubtful mind that they were not going
 12 to be disclosing the information they said
 13 they would disclose.
 14 CHAYTOR, Q.C.:
 15 Q. Okay, and given the experience though that you
 16 had, including if you don't ask the question
 17 specifically, you don't get the answer, and
 18 the frustration you were having in getting
 19 information from Eastern Health, you still had
 20 that trust that the information would go
 21 forward?
 22 MS. MUNDON:
 23 A. I had that trust because of the fact that
 24 there was a briefing with the Minister and
 25 officials at the senior level were there and

Page 24

1 we all left the meeting, from a Government
 2 perspective, with the understanding that those
 3 numbers would be disclosed. I had no reason
 4 to think that senior officials at that level
 5 at Eastern Health would deceive the Minister.
 6 CHAYTOR, Q.C.:
 7 Q. If we could look at then, page 30 now, please,
 8 of the exhibit? Ms. Mundon, I understand that
 9 you can't tell us when, if ever, you read the
 10 remainder of the document or the documents
 11 that were forwarded until the spring of 2007.
 12 Is that correct?
 13 MS. MUNDON:
 14 A. Yes.
 15 CHAYTOR, Q.C.:
 16 Q. And on page 30, had you read page 30, I would
 17 suggest to you that question nine makes it
 18 perhaps more obvious what numbers will be
 19 given out and what numbers would not. The
 20 question is "what is the rate of error? How
 21 many people converted? Up to this point in
 22 time, our focus has been on making treatment
 23 changes where appropriate and 117 individuals
 24 have experienced treatment changes. Some of
 25 these changes are because of a conversion in

Page 25

1 their ER/PR test result from negative to
 2 positive; some because of the definition of
 3 negative has changed; some because of where
 4 patients are today with their disease. There
 5 are multiple factors involved. Now that legal
 6 proceedings have been initiated, we will have
 7 to allow the legal process to determine if, in
 8 fact, error has occurred. The numbers of
 9 individual conversions are not relevant and
 10 turn the process into a numbers game."
 11 And then, for example, they give examples
 12 of that and they finish with "what is relevant
 13 is the number of people whose care may change
 14 as a result of the process and that was 117."
 15 Did the substance of what's in the answer
 16 to question nine here, did the substance of
 17 that come to your attention in December 2006?
 18 MS. MUNDON:
 19 A. No, it did not.
 20 CHAYTOR, Q.C.:
 21 Q. If we could look at 0196, please, Registrar?
 22 And this is you acknowledging, at 9:50 in the
 23 morning, that morning, you're acknowledging
 24 receipt of the documentation that was
 25 forwarded to you by Ms. Bonnell, and then if

Page 26

1 we could look at 1454, please? You forwarded
 2 this information on to others within the
 3 Department, including, it appears, Ms.
 4 Hennessey and you've printed a copy for the
 5 Minister. So at 10:36 the same morning, you
 6 write "as promised, please see attached" and
 7 what did you mean by "as promised"? Who had
 8 made a promise to get the information to
 9 others within the Department?
 10 MS. MUNDON:
 11 A. I had made the commitment that when I received
 12 materials, I would forward them to officials
 13 in the Department.
 14 CHAYTOR, Q.C.:
 15 Q. Okay, and you indicate that "Minister, I have
 16 printed a copy for you." So how did you get
 17 the Minister's copy to him, and when did he
 18 receive his copy?
 19 MS. MUNDON:
 20 A. I would have printed that off for him as I was
 21 sending that e-mail and brought it up to him
 22 that morning.
 23 CHAYTOR, Q.C.:
 24 Q. So you hand-delivered it to him yourself?
 25 MS. MUNDON:

Page 27

1 A. Yes.
 2 CHAYTOR, Q.C.:
 3 Q. Okay, and was there any discussion between you
 4 and the Minister about the documentation?
 5 MS. MUNDON:
 6 A. I don't recall. I probably would have told
 7 him that I would have read the initial--the
 8 news release and the key messages document,
 9 that I hadn't read through the rest of the
 10 materials at that point in time.
 11 CHAYTOR, Q.C.:
 12 Q. And do you know if the Minister read it
 13 himself?
 14 MS. MUNDON:
 15 A. I'm not aware if he read it or not.
 16 CHAYTOR, Q.C.:
 17 Q. He didn't read it in your presence when you
 18 brought it to him?
 19 MS. MUNDON:
 20 A. No.
 21 CHAYTOR, Q.C.:
 22 Q. Did you see him skim through it?
 23 MS. MUNDON:
 24 A. Yes, I saw him skim through the first few
 25 pages.

Page 28

1 CHAYTOR, Q.C.:
 2 Q. And did he have any questions for you around
 3 the documents?
 4 MS. MUNDON:
 5 A. Not that I recall, no.
 6 CHAYTOR, Q.C.:
 7 Q. And did you point anything out in the
 8 documentation to the Minister?
 9 MS. MUNDON:
 10 A. No, not that I recall.
 11 CHAYTOR, Q.C.:
 12 Q. Was there any other discussion at all between
 13 you that morning about this issue?
 14 MS. MUNDON:
 15 A. I don't recall any further discussion that
 16 morning.
 17 CHAYTOR, Q.C.:
 18 Q. Did you have discussion with Mr. Abbott or Ms.
 19 Hennessey around the documents?
 20 MS. MUNDON:
 21 A. Not that I recall, no. I just forwarded the
 22 materials on to them.
 23 CHAYTOR, Q.C.:
 24 Q. And nobody came back with any questions or
 25 comment?

Page 29

1 MS. MUNDON:
 2 A. No, not that I remember, no.
 3 CHAYTOR, Q.C.:
 4 Q. Did you attend the media briefing?
 5 MS. MUNDON:
 6 A. No, I did not.
 7 CHAYTOR, Q.C.:
 8 Q. Okay, and why not?
 9 MS. MUNDON:
 10 A. It wasn't the practice for the director of
 11 communications for the Department to attend
 12 news conferences for Eastern Health unless the
 13 Minister was participating within that news
 14 conference.
 15 CHAYTOR, Q.C.:
 16 Q. Okay, and I take it nobody asked you to
 17 attend?
 18 MS. MUNDON:
 19 A. No, they did not.
 20 CHAYTOR, Q.C.:
 21 Q. And nobody else from the Department attended?
 22 MS. MUNDON:
 23 A. No.
 24 CHAYTOR, Q.C.:
 25 Q. So do you recall then what else happened

Page 30

1 regarding the news or the media conference
 2 that day?
 3 MS. MUNDON:
 4 A. Well, later that day, I think I would--well,
 5 the House would have opened that afternoon, so
 6 I would have been over there, and then when--I
 7 think there were a number of media clippings
 8 that were sent to me electronically. I would
 9 have forwarded those on to officials within
 10 the Department.
 11 CHAYTOR, Q.C.:
 12 Q. And in terms of sending this material to
 13 anyone else within Government, who else did
 14 you send the material to?
 15 MS. MUNDON:
 16 A. I wouldn't have sent it to anybody else, that
 17 I remember.
 18 CHAYTOR, Q.C.:
 19 Q. Just to officials, senior officials within the
 20 Department?
 21 MS. MUNDON:
 22 A. Yes.
 23 CHAYTOR, Q.C.:
 24 Q. So you didn't send it to Josephine Cheeseman?
 25 MS. MUNDON:

Page 31

1 A. No.
 2 CHAYTOR, Q.C.:
 3 Q. You didn't send it to anyone in Cabinet
 4 Secretariat or the Premier's office?
 5 MS. MUNDON:
 6 A. No.
 7 CHAYTOR, Q.C.:
 8 Q. Why not?
 9 MS. MUNDON:
 10 A. Well, it wouldn't be my role to send it to
 11 Cabinet Secretariat, and with respect to
 12 sending it to Ms. Cheeseman, I just wouldn't--
 13 Eastern Health was managing the issue. They
 14 had the media briefing. So I just wouldn't
 15 have saw the need at that time to forward
 16 those materials over.
 17 CHAYTOR, Q.C.:
 18 Q. I take it this is a fairly significant event
 19 though, to have a technical media briefing of
 20 this magnitude when we look at the
 21 documentation as to what's going to go
 22 forward. I take it that's a fairly
 23 significant media event.
 24 MS. MUNDON:
 25 A. From Eastern Health's perspective, certainly,

Page 32

1 yes.
 2 CHAYTOR, Q.C.:
 3 Q. And well, from Government's perspective too, I
 4 would think.
 5 MS. MUNDON:
 6 A. Certainly from our Department's perspective,
 7 yes.
 8 CHAYTOR, Q.C.:
 9 Q. But you would not then have to notify or feel
 10 obliged to notify Ms. Cheeseman about that?
 11 MS. MUNDON:
 12 A. I would certainly have notified Ms. Cheeseman
 13 if there was something that had caused me a
 14 level of concern. However, there was nothing--
 15 at the time, there was nothing that caused me
 16 any level of concern. It was them carrying
 17 out on directions that were provided by the
 18 Minister to have a briefing with the media and
 19 to disclose all the numbers.
 20 CHAYTOR, Q.C.:
 21 Q. I'm sorry, the Minister gave them direction to
 22 hold this briefing to disclose all the
 23 numbers?
 24 MS. MUNDON:
 25 A. Sorry, I'm not sure if he actually gave them

Page 33

1 direction in the briefing, but certainly, that
 2 was his wish, that they would be disclosing
 3 the numbers.
 4 CHAYTOR, Q.C.:
 5 Q. And was this briefing done on the Minister's
 6 direction or on Eastern Health's initiation?
 7 MS. MUNDON:
 8 A. I can't recall specifically if Eastern Health
 9 had planned to do it or if the Minister wanted
 10 them to do it. Certainly, the Minister would
 11 have wanted them to do it in any event.
 12 CHAYTOR, Q.C.:
 13 Q. Yes, and there was, you mentioned yesterday,
 14 some reluctance expressed by Eastern Health in
 15 terms of--or at least one person in the room
 16 in terms of why the need for a media briefing?
 17 MS. MUNDON:
 18 A. Yes, and I do know that until the Minister had
 19 inquired for an update that there was no date
 20 set for a media briefing at that point in
 21 time.
 22 CHAYTOR, Q.C.:
 23 Q. Okay. So it was your impression, at least,
 24 that it required some prompting to have this
 25 event take place?

Page 34

1 MS. MUNDON:
 2 A. One could certainly take that impression away
 3 from that, yes.
 4 CHAYTOR, Q.C.:
 5 Q. And I also take it, in reviewing the news
 6 coverage for the past year, prior to December
 7 11th 2006, that Eastern Health had been silent
 8 on this issue, except for the statement to The
 9 Current?
 10 MS. MUNDON:
 11 A. Yes, that's my understanding.
 12 CHAYTOR, Q.C.:
 13 Q. That's your understanding and was at the time?
 14 MS. MUNDON:
 15 A. Yes.
 16 CHAYTOR, Q.C.:
 17 Q. If we could look at, please, 0196, page four?
 18 This is an e-mail by yourself to Leona
 19 Barrington and Ms. Bonnell that same morning
 20 at 11:11 a.m. "Can one of you please give me
 21 a call following the briefings on ER/PR, so I
 22 can update the Minister before the House of
 23 Assembly opens this afternoon." Now what time
 24 would the House open?
 25 MS. MUNDON:

Page 35

1 A. The House opens at 1:30.
 2 CHAYTOR, Q.C.:
 3 Q. So you e-mailed to Ms. Barrington and Ms.
 4 Bonnell asking them to provide you an update
 5 on what had happened, I take it, or how the
 6 briefings were going?
 7 MS. MUNDON:
 8 A. Yes.
 9 CHAYTOR, Q.C.:
 10 Q. And did they get back to you?
 11 MS. MUNDON:
 12 A. I can't recall if they did or not.
 13 CHAYTOR, Q.C.:
 14 Q. You have no recollection of them contacting
 15 you?
 16 MS. MUNDON:
 17 A. No. I know if they would have, I would have
 18 certainly provided that information to the
 19 Minister and the Deputy. Nothing stands out
 20 in my mind, which leads me to believe that if
 21 they did call me, it would have--there would
 22 have been nothing alarming in the call, but I
 23 can't specifically remember if they made that
 24 call to me.
 25 CHAYTOR, Q.C.:

Page 36

1 Q. And if you hadn't heard back from them, this
 2 was at 11:11 a.m., it's two more hours before
 3 the briefing or sorry, before the House opens,
 4 would you not have gotten back to them again,
 5 sent them another e-mail and said "what's
 6 happened? How are things? The Minister is
 7 about to walk into the House."
 8 MS. MUNDON:
 9 A. It's likely that I would have called them, if
 10 I hadn't heard from them, yes.
 11 CHAYTOR, Q.C.:
 12 Q. And do we have any further e-mail to them from
 13 yourself?
 14 MS. MUNDON:
 15 A. Not that I'm aware of, no.
 16 CHAYTOR, Q.C.:
 17 Q. Certainly nothing that we've been provided.
 18 So is it likely that you, in fact, spoke to
 19 either Ms. Barrington or Ms. Bonnell at some
 20 point that morning of the 11th, after the
 21 briefings?
 22 MS. MUNDON:
 23 A. It is likely that I did.
 24 CHAYTOR, Q.C.:
 25 Q. But you have no recollection of that or what

Page 37

1 was said to you?
 2 MS. MUNDON:
 3 A. No, I don't. Again, as I said, if they did
 4 call me, I would have relayed the information
 5 from that conversation to both the Minister
 6 and the Deputy Minister.
 7 CHAYTOR, Q.C.:
 8 Q. Okay. If we could have 1455, please? And
 9 this is an e-mail, it starts on the bottom
 10 here, from yourself to the Minister, as well
 11 as the Deputy Minister, Ms. Hennessey, and to
 12 Mr. Hynes, and it's the same night as the
 13 briefing, December 11th, at 9:11 p.m., and
 14 you're forwarding on a news story, "117
 15 Newfoundland and Labrador cancer patients
 16 receive belated hormone treatment, last
 17 updated Monday, December 11th, 2006." So it's
 18 CBC News and it's perhaps, I take it, Ms.
 19 Mundon, it's printed from the website, is it?
 20 MS. MUNDON:
 21 A. Yes.
 22 CHAYTOR, Q.C.:
 23 Q. Okay, and you write, in sending this on to the
 24 Minister and the others, you write "note Peter
 25 Dawe's comments."

Page 38

1 MS. MUNDON:
 2 A. Um-hm.
 3 CHAYTOR, Q.C.:
 4 Q. When we look down through it, it's a
 5 relatively short piece, so perhaps if you
 6 wanted to just read down through it, and tell
 7 me what was it about Mr. Dawe's comments that
 8 were noteworthy to you?
 9 MS. MUNDON:
 10 A. The paragraph on the--the first paragraph on
 11 the second page which says there "because of
 12 potential lawsuit, Provincial Health officials
 13 refused to explain if their discrepancy
 14 resulted from human error or from new methods
 15 of interpreting test results," and then
 16 following that his comments as "not receiving
 17 this treatment could very well mean a life and
 18 death issue for people going through the
 19 process, he said" and then so I said that, you
 20 know, that was--I felt that that was
 21 significant.
 22 CHAYTOR, Q.C.:
 23 Q. If I can just take you back there because the
 24 next thing to that is attributed to Mr. Dawe
 25 is "The lack of disclosure raises questions,

Page 39

1 said Dawe, about what the problem is and how
 2 it can be fixed."
 3 MS. MUNDON:
 4 A. Yes, and I likely was referring to that as
 5 well with the disclosure here meaning, again,
 6 this first paragraph on the second page,
 7 "refusing to explain if it resulted from human
 8 error or from new methods of interpreting test
 9 results."
 10 CHAYTOR, Q.C.:
 11 Q. Okay.
 12 MS. MUNDON:
 13 A. And again, like I wouldn't have been surprised
 14 by that statement here because they didn't
 15 know--they didn't have an answer for what went
 16 wrong when they had the briefing with the
 17 Minister either.
 18 CHAYTOR, Q.C.:
 19 Q. So why is it then that you're saying "note Mr.
 20 Dawe's comments", is that's consistent with
 21 what you had been told on November 23rd, why
 22 is Mr. Dawe's comments noteworthy?
 23 MS. MUNDON:
 24 A. Just because of the fact that it is
 25 consistent.

Page 40

1 CHAYTOR, Q.C.:
 2 Q. So that makes it noteworthy?
 3 MS. MUNDON:
 4 A. Yes.
 5 CHAYTOR, Q.C.:
 6 Q. Okay. Mr. Hynes responds to you at 10:17 that
 7 evening and says, "I hate to say it, but Peter
 8 has a point." Why would Mr. Hynes hate to
 9 acknowledge that Mr. Dawe has a point?
 10 MS. MUNDON:
 11 A. I'm not sure, I guess you would have to ask
 12 Mr. Hynes that question.
 13 CHAYTOR, Q.C.:
 14 Q. Oh I shall indeed. I'm just wondering if you
 15 have any knowledge, though, as to whether or
 16 not there is any issue between Mr. Hynes or
 17 the department with Mr. Dawe?
 18 MS. MUNDON:
 19 A. Not that I'm aware of, no.
 20 CHAYTOR, Q.C.:
 21 Q. So did that surprise you to see that written
 22 there?
 23 MS. MUNDON:
 24 A. I don't even know if I really paid much
 25 attention to that, other than to say that he

Page 41

1 has a point and then I responded and said that
 2 he does indeed.
 3 CHAYTOR, Q.C.:
 4 Q. Yes. So is that a sentiment that you've heard
 5 expressed in the department before, that
 6 somehow some reluctance to give any credit to
 7 Mr. Dawe?
 8 MS. MUNDON:
 9 A. I didn't read it as a reluctance to give
 10 credit to Mr. Dawe, I wasn't reading into it
 11 in that way.
 12 CHAYTOR, Q.C.:
 13 Q. Certainly I don't want to read too much into
 14 it, but usually if I say "I'd hate to say it,
 15 someone has a point", I'm doing it grudgingly.
 16 You didn't take it that way?
 17 MS. MUNDON:
 18 A. I didn't take it that way and again, you know,
 19 Mr. Hynes, I guess would be the best person to
 20 explain that, but I certainly wasn't reading
 21 anything into that comment.
 22 CHAYTOR, Q.C.:
 23 Q. So to your knowledge there's no issue with Mr.
 24 Dawe's commentary on this issue within the
 25 department?

Page 42

1 MS. MUNDON:
 2 A. Not that I'm aware of, no.
 3 CHAYTOR, Q.C.:
 4 Q. Or were aware of.
 5 MS. MUNDON:
 6 A. Or were aware of.
 7 CHAYTOR, Q.C.:
 8 Q. So and you agree that Mr. Dawe does have a
 9 point?
 10 MS. MUNDON:
 11 A. Yes.
 12 CHAYTOR, Q.C.:
 13 Q. And what is it then about what Mr. Dawe said
 14 that you agree is a valid point that's being
 15 made?
 16 MS. MUNDON:
 17 A. Well as I said earlier, that's his direct
 18 quote there, not receiving "this treatment
 19 could very well mean a life and death issue
 20 for people going through the process", you
 21 know, is a very valid point, I thought. And
 22 "The lack of disclosure raises questions about
 23 what the problem is and how do we fix it",
 24 again, I was thinking he was talking about the
 25 first paragraph on the second page there about

Page 43

1 "how they refused to explain if resulted from
 2 human error or from new methods", so again,
 3 the fact that after all this time the cancer
 4 patients still don't have an answer as to what
 5 went wrong.
 6 CHAYTOR, Q.C.:
 7 Q. Yes, and that was the question again that Ms.
 8 O'Neil-Yates alerted you or the department,
 9 through you, back on November 22nd?
 10 MS. MUNDON:
 11 A. Yes.
 12 CHAYTOR, Q.C.:
 13 Q. And that question is obviously still not being
 14 answered.
 15 MS. MUNDON:
 16 A. That's right.
 17 CHAYTOR, Q.C.:
 18 Q. And so you saw that as a valid point.
 19 MS. MUNDON:
 20 A. Yes.
 21 CHAYTOR, Q.C.:
 22 Q. And did it cause you concern that they still
 23 were not able to answer that question or were
 24 not answering that question?
 25 MS. MUNDON:

Page 44

1 A. I think even in the briefing that they had
 2 with the Minister, they didn't have an answer
 3 to that question, so again, as I indicated
 4 earlier, up until the time I went on maternity
 5 leave, I still did not have an answer to that
 6 question.
 7 CHAYTOR, Q.C.:
 8 Q. Now, Ms. Mundon, when I read this article it
 9 says "Because of a potential lawsuit,
 10 Provincial Health officials refuse to
 11 explain"--and then down here, it's "the lack
 12 of disclosure raises questions". So when you
 13 read that, is it that the answer doesn't exist
 14 or that they are refusing to speak to the
 15 answer because of the potential lawsuit?
 16 MS. MUNDON:
 17 A. If they would have explained or provided an
 18 answer in the briefing on November 23rd for
 19 us, as to what went wrong, and now we're
 20 saying that they refuse to explain, then it
 21 would have caused me concern. But they didn't
 22 have an answer to that question in the
 23 briefing, so it didn't cause me any concern
 24 when I had read this article, no.
 25 CHAYTOR, Q.C.:

Page 45

1 Q. So you're interpreting this as being they
 2 don't have an answer that they could provide?
 3 MS. MUNDON:
 4 A. That's right.
 5 CHAYTOR, Q.C.:
 6 Q. And what did you think the lack of disclosure-
 7 -you're a communications person, when it says
 8 "lack of disclosure" what does that mean?
 9 MS. MUNDON:
 10 A. At the time, you know, there was a significant
 11 period of time where Eastern Health had not
 12 gone out and provided any information, either
 13 in the media or to the public throughout 2006
 14 and again, the lack of disclosure here, I
 15 would assume would refer to the fact that it's
 16 been almost a year now since Eastern Health
 17 has gone out with any relevant information on
 18 this.
 19 CHAYTOR, Q.C.:
 20 Q. It's in the context of the lack of disclosure
 21 being what the problem is and how it can be
 22 fixed.
 23 MS. MUNDON:
 24 A. Yes.
 25 CHAYTOR, Q.C.:

Page 46

1 Q. That didn't cause you any concern?
 2 MS. MUNDON:
 3 A. No, not at the time, again I wasn't looking at
 4 it from the lens of thinking that information
 5 would be withheld.
 6 CHAYTOR, Q.C.:
 7 Q. So that lack of disclosure phrase did not
 8 alert you to that, that information may be
 9 being withheld?
 10 MS. MUNDON:
 11 A. No, not when I read this, I wasn't thinking
 12 that, no.
 13 CHAYTOR, Q.C.:
 14 Q. Nor the wording "because of the potential
 15 lawsuit Provincial Health officials refuse to
 16 explain", that didn't cause you to question,
 17 well perhaps there is information but they are
 18 holding back for reasons of perhaps legal
 19 liability from giving out the information?
 20 MS. MUNDON:
 21 A. Again, I had no reason at the time to question
 22 that, and again because of the fact that we
 23 had the briefing with the Minister and we
 24 understood that all the information would be
 25 disclosed, and because of the fact that I was

Page 47

1 never provided any information, any differing
 2 information to that, and from Ms. Bonnell,
 3 then I wasn't looking at it from that lens.
 4 CHAYTOR, Q.C.:
 5 Q. Now I take it you followed--part of your job
 6 is to follow the media afterwards.
 7 MS. MUNDON:
 8 A. Yes.
 9 CHAYTOR, Q.C.:
 10 Q. And you would have done that following this
 11 significant media event on the issue, you
 12 would have done that?
 13 MS. MUNDON:
 14 A. Yes.
 15 CHAYTOR, Q.C.:
 16 Q. And you didn't need Ms. Bonnell to interpret
 17 that or raise any points out of the media
 18 coverage, you're able to do that and you would
 19 have done that.
 20 MS. MUNDON:
 21 A. Yes.
 22 CHAYTOR, Q.C.:
 23 Q. You do acknowledge that Mr. Dawe has a point.
 24 MS. MUNDON:
 25 A. Yes.

Page 48

1 CHAYTOR, Q.C.:
 2 Q. If Mr. Dawe has a valid point, did you take it
 3 up with the Minister?
 4 MS. MUNDON:
 5 A. I'm not sure if I specifically had talked to
 6 him about that, I certainly copied him on all
 7 of these clippings.
 8 CHAYTOR, Q.C.:
 9 Q. Now he's not copied on the response though,
 10 acknowledging that Mr. Dawe has a point.
 11 MS. MUNDON:
 12 A. No, but he is copied on the fact that it says
 13 "note Mr. Dawe's comments".
 14 THE COMMISSIONER:
 15 Q. I'm sorry, I didn't catch that last sentence.
 16 MS. MUNDON:
 17 A. Just that the Minister was copied in the
 18 original e-mail where it says "Note Mr. Dawe's
 19 comments."
 20 THE COMMISSIONER:
 21 Q. Thank you.
 22 CHAYTOR, Q.C.:
 23 Q. So do you recall after sending this, you
 24 obviously had an exchange back from Mr. Hynes.
 25 Did you hear anything back from Ms. Hennessey,

Page 49

1 Mr. Abbott or Minister Osborne?
 2 MS. MUNDON:
 3 A. No, not that I recall.
 4 CHAYTOR, Q.C.:
 5 Q. Did you have any discussions with them around
 6 this?
 7 MS. MUNDON:
 8 A. Not that I recall, no.
 9 CHAYTOR, Q.C.:
 10 Q. Is that something that you think you would
 11 recall?
 12 MS. MUNDON:
 13 A. I think I would recall, yes.
 14 CHAYTOR, Q.C.:
 15 Q. Now in tracking the media in the days that
 16 followed, was there anything in the media
 17 coverage that surprised you? Anything
 18 different than what you had--based on your
 19 meeting of November 23rd and what your
 20 expectations were, was there anything in the
 21 media coverage that surprised you?
 22 MS. MUNDON:
 23 A. There was certainly nothing that I, you know,
 24 that led me to believe at the time in
 25 scanning, quickly scanning the media, there

Page 50

1 was nothing there that caused me any alarm.
 2 You know, I do know now in hindsight, reading
 3 back, that certainly the article in The
 4 Telegram on the day following, in the second
 5 paragraph, makes a reference there to
 6 conversion rates. But I don't recall at the
 7 time looking at that article and, like paying
 8 any real attention to it.
 9 CHAYTOR, Q.C.:
 10 Q. And the media coverage including the article
 11 in The Telegram the following day, refers to
 12 the fact that Eastern Health had not revealed
 13 all the numbers, doesn't it?
 14 MS. MUNDON:
 15 A. In hindsight when I look back, it reveals in
 16 that second paragraph, it talks about
 17 conversion rates and that conversion rates
 18 were not provided.
 19 CHAYTOR, Q.C.:
 20 Q. And that Eastern Health had refused to go
 21 there.
 22 MS. MUNDON:
 23 A. Yes.
 24 CHAYTOR, Q.C.:
 25 Q. And that's spelled out fairly clearly, I would

Page 51

1 suggest to you, in the media coverage.
 2 MS. MUNDON:
 3 A. Yes.
 4 CHAYTOR, Q.C.:
 5 Q. But that didn't catch your attention at the
 6 time?
 7 MS. MUNDON:
 8 A. Not that I recall, no.
 9 CHAYTOR, Q.C.:
 10 Q. Well, did it?
 11 MS. MUNDON:
 12 A. No, not that I remember, I can say to you
 13 clearly, Ms. Chaytor, today that at no point
 14 in time from the briefing with the Minister in
 15 November, up until the spring of 2007 was I
 16 aware that Eastern Health did not disclose
 17 that information.
 18 CHAYTOR, Q.C.:
 19 Q. So did you read the articles at the time?
 20 MS. MUNDON:
 21 A. I certainly would have read the articles, you
 22 know, I would have had a quick scan of the
 23 articles, certainly the one here where I made
 24 a comment to say no comments and things like
 25 that.

Page 52

1 CHAYTOR, Q.C.:
 2 Q. If we could have, please, P-0428, page 3? And
 3 there's a bunch here, Ms. Mundon, I'll just
 4 take you to a couple of them. This is CBC
 5 news that night, Chris O'Neil-Yates who you
 6 had had e-mail exchange with back November
 7 27th and Ms. O'Neil-Yates in her report states
 8 "Because of a class action lawsuit, Eastern
 9 Health will not say how many of those samples
 10 had a false result. Eastern Health will only
 11 say that 117 patients required treatment
 12 changes." And then she goes on and
 13 reiterates, "The corporation won't say how
 14 many of these patients are part of the
 15 retesting or how many people who passed away
 16 had the initial false result. Eastern Health
 17 says it's putting quality assurance measures
 18 in place to restore public confidence before
 19 it resumes this test and says it doesn't know
 20 how the false results happened." So in terms
 21 of not disclosing the overall numbers, I would
 22 suggest to you that in this piece, along with
 23 The Telegram article that you pointed out,
 24 it's clearly articulated that Eastern Health,
 25 because of the lawsuit, is refusing to say how

Page 53

1 many patients in total had a false result.
 2 MS. MUNDON:
 3 A. Yes.
 4 CHAYTOR, Q.C.:
 5 Q. And you would have received, I take it, copies
 6 of any media coverage at the time?
 7 MS. MUNDON:
 8 A. I'm not sure if I would have received this, I
 9 know this document that you have in front of,
 10 on the screen here, is a document prepared or
 11 provided by Eastern Health and I do know that
 12 they provided in the spring of 2007, they
 13 provided a CD with all the media clippings on
 14 the issue that I would have included in the
 15 binder for the Minister.
 16 MS. MUNDON:
 17 A. Yes, and would you have watched the news that
 18 evening? Is that part of what you do?
 19 MS. MUNDON:
 20 A. Depending upon how late I would be at work, if
 21 I would have seen the news that evening, I
 22 can't say if I saw it or not.
 23 CHAYTOR, Q.C.:
 24 Q. Did you get any or the department get any
 25 media request or inquiries in follow up to the

Page 54

1 briefing?
 2 MS. MUNDON:
 3 A. No, we did not.
 4 CHAYTOR, Q.C.:
 5 Q. So Ms. O'Neil-Yates, who had contacted you on
 6 November 22nd looking for certain information
 7 and wondering if the Minister could speak to
 8 what went wrong and she did not follow up and
 9 ask you anything?
 10 MS. MUNDON:
 11 A. No.
 12 CHAYTOR, Q.C.:
 13 Q. Nor did any of the other media?
 14 MS. MUNDON:
 15 A. No.
 16 CHAYTOR, Q.C.:
 17 Q. In the days then following, December 12th and
 18 onwards, was there any discussion at all in
 19 the department about the media technical
 20 briefing, what was said, what wasn't said, how
 21 it went from the department's perspective?
 22 MS. MUNDON:
 23 A. Not that I can recall.
 24 CHAYTOR, Q.C.:
 25 Q. And is that something you think you could

Page 55

1 recall?
 2 MS. MUNDON:
 3 A. I think I would have recalled, again, you
 4 know, obviously I can't recall all the details
 5 around this, but I can tell you that at no
 6 point in time from November 2006 on to the
 7 time the story broke in May of 2007, was I
 8 aware that this information had not been
 9 disclosed. And if I had of known that -
 10 THE COMMISSIONER:
 11 Q. You say this information, what precisely are
 12 you referring to?
 13 MS. MUNDON:
 14 A. The information that was contained in that
 15 sheet, Madam Commissioner.
 16 THE COMMISSIONER:
 17 Q. Well some of it was disclosed, of course.
 18 MS. MUNDON:
 19 A. But I expected for all of it to be disclosed.
 20 THE COMMISSIONER:
 21 Q. But that's my question, what is it about
 22 what's on that sheet that in your view has not
 23 been disclosed?
 24 MS. MUNDON:
 25 A. The conversion rate.

Page 56

1 THE COMMISSIONER:
 2 Q. So is that what we're really talking about
 3 here is the fact that conversion rate, is
 4 there something else on that sheet that you
 5 had expected to be revealed that was not?
 6 MS. MUNDON:
 7 A. The conversion rate is the piece that stands
 8 out in my mind, you know, I remember in May of
 9 2007 when the story broke that I was very
 10 surprised by the fact that the media were
 11 reporting that Eastern Health had not
 12 disclosed this information that had been
 13 contained in a court affidavit and that the
 14 media had referenced an error rate of 42
 15 percent, which I never heard, it was never
 16 explained to me at any time of an error rate
 17 of 42 percent.
 18 CHAYTOR, Q.C.:
 19 Q. Okay, Ms. Mundon, if we continue on down this
 20 same page of the exhibit, we also have the
 21 coverage that night from NTV and Carolyn
 22 Stokes writes, "Eastern Health referred almost
 23 3000 samples, dating back to 1997 and sent
 24 over 900 to Mount Sinai Hospital to be
 25 retested. As a result, 117 women were told

Page 57

1 they were given inappropriate cancer
 2 treatments. That number doesn't include the
 3 amount of false results of patients who are
 4 now deceased. Eastern Health says that number
 5 can't be released due to a class action
 6 lawsuit that has been launched against them."
 7 And if we could have--actually I can do it,
 8 page 7 and this is the following day, CBC TV
 9 and it's Chris O'Neil-Yates again and an
 10 interview it appears with Dr. Howell. Chris
 11 O'Neil-Yates states, "But there's one piece of
 12 information that still hasn't come out and
 13 that is how many of those 1000 tests were
 14 wrong?" NTV the next day as well says that
 15 "Answers though today were met by even more
 16 questions. Here's NTV's Carolyn Stokes who is
 17 following the story for us. Peter Dawe of the
 18 Canadian Cancer Society has a lot of
 19 unanswered questions for Eastern Health. How
 20 many tests have we got wrong at the lab and
 21 the test results changed? How many people
 22 survived, how many people didn't survive out
 23 of this group? Carolyn Stokes says Eastern
 24 Health has revealed that 117 breast cancer
 25 patients have received the wrong treatment due

Page 58

1 to inaccuracies in the estrogen progesterone
 2 tests conducted in this lab at the Health
 3 Sciences Centre." And then if we go to the
 4 article that, I believe you acknowledge you
 5 would have certainly seen The Telegram.
 6 MS. MUNDON:
 7 A. After the fact, in the spring of 2007 is when
 8 I remember seeing this.
 9 CHAYTOR, Q.C.:
 10 Q. So you didn't read The Telegram on December
 11 12th?
 12 MS. MUNDON:
 13 A. I can't recall reading that particular article
 14 at that time. I may have read it and I may
 15 not have, I just know that at the time I just-
 16 -I wasn't aware of the fact that they didn't
 17 disclose it, so looking back at this in
 18 hindsight, I see in the second paragraph that
 19 it talks here about samples that have been
 20 converted.
 21 CHAYTOR, Q.C.:
 22 Q. So it would have been, though, your job to
 23 track the media after this event, any issue
 24 that's of relevance to the department you
 25 would track the media?

Page 59

1 MS. MUNDON:
 2 A. Yes, I would have been tracking the media;
 3 however, there would have been a time where
 4 the House of Assembly would have been open as
 5 well and I would have been preparing the
 6 Minister for the House session.
 7 CHAYTOR, Q.C.:
 8 Q. I thought the House closed on the 12th?
 9 MS. MUNDON:
 10 A. It closed, yes, that afternoon of the 12th.
 11 CHAYTOR, Q.C.:
 12 Q. And isn't it important to track the media when
 13 the House is open -
 14 MS. MUNDON:
 15 A. Yes.
 16 CHAYTOR, Q.C.:
 17 Q. As much as it is when it's not?
 18 MS. MUNDON:
 19 A. Yes.
 20 CHAYTOR, Q.C.:
 21 Q. Probably more so in case there's issues that
 22 arise and the Minister may get asked.
 23 MS. MUNDON:
 24 A. In this article, as I indicated yesterday,
 25 there's a media package that's put together by

Page 60

1 the communications division in our department
 2 by the secretary and this would have been part
 3 of that package.
 4 CHAYTOR, Q.C.:
 5 Q. This was in your binder that you referred to
 6 earlier?
 7 MS. MUNDON:
 8 A. This was in the binder that I referred to
 9 yesterday from the spring of 2007, yes.
 10 CHAYTOR, Q.C.:
 11 Q. Yes, but when you went looking to compile the
 12 information in the spring of 2007, where did
 13 you find this article?
 14 MS. MUNDON:
 15 A. As I just was saying to you a few minutes ago,
 16 that within the department, the secretary
 17 would compile a list of media clippings that
 18 would be distributed to people in department.
 19 CHAYTOR, Q.C.:
 20 Q. Yes, but what I'm saying, Ms. Mundon, is that
 21 while you may have put this together in the
 22 spring of 2007, I take it, it existed within
 23 the department from back in December 2006.
 24 MS. MUNDON:
 25 A. Yes.

Page 61

1 CHAYTOR, Q.C.:

2 Q. Okay. And this is the article where it says

3 "Deana Stokes-Sullivan, however because of a

4 pending class action lawsuit, Eastern Health

5 officials won't say how many samples have

6 converted in the latest round of testing from

7 negative to positive for estrogen and

8 progesterone receptors". So, I just want to

9 understand and make sure that the

10 Commissioner, more importantly understands

11 that your evidence on this is that while it

12 was your job to track the media, all of those

13 stories escaped your attention in terms of

14 them stating that Eastern Health has clearly

15 not released all of the numbers?

16 MS. MUNDON:

17 A. I'm saying that I obviously overlooked it at

18 the time, yes. However, I did provide the

19 articles to other people within the

20 department, as well.

21 CHAYTOR, Q.C.:

22 Q. Who?

23 MS. MUNDON:

24 A. The minister, the deputy minister, the

25 assistant deputy minister.

Page 62

1 CHAYTOR, Q.C.:

2 Q. And to your knowledge, was it also overlooked

3 by all of them?

4 MS. MUNDON:

5 A. To my knowledge, yes. I don't remember any

6 conversations with anyone at the time that we

7 would have realized that the information

8 wasn't disclosed.

9 THE COMMISSIONER:

10 Q. When you say the assistant deputy minister,

11 which of them are you referring to?

12 MS. MUNDON:

13 A. Ms. Hennessey.

14 THE COMMISSIONER:

15 Q. All right, thank you.

16 CHAYTOR, Q.C.:

17 Q. Okay, Ms. Mundon, there are others, but I

18 won't belabour the point by taking you through

19 the other media coverage. The House closed on

20 December 12, I understand.

21 MS. MUNDON:

22 A. Yes.

23 CHAYTOR, Q.C.:

24 Q. Okay. Did the department have any input into

25 the date of December 11 being chosen as the

Page 63

1 date for the media technical briefing?

2 MS. MUNDON:

3 A. Not that I recall, no. The House closed on

4 the 12th.

5 CHAYTOR, Q.C.:

6 Q. Yes, the day after.

7 MS. MUNDON:

8 A. Yes.

9 CHAYTOR, Q.C.:

10 Q. Yes. So, there was no discussion, to your

11 knowledge about when this would be heard or

12 sorry, when this would be held?

13 MS. MUNDON:

14 A. No, and I think the e-mail that we had looked

15 at previously, yesterday, I had asked Ms.

16 Bonnell what dates the technical briefing

17 would occur and the briefing of Mr. Dawe. I

18 didn't suggest to her a date.

19 CHAYTOR, Q.C.:

20 Q. If we can have, please, P-1456. And Ms.

21 Mundon, this is again from yourself to Mr.

22 Hynes, Mr. Abbott, Ms. Hennessey and the

23 minister, Minister Osborne and it's December

24 12 at 9:13 at night. It's got 8:24 in the

25 corner, is this the time that it's actually

Page 64

1 being said? This looks like it's another

2 tracking of the Night Line.

3 MS. MUNDON:

4 A. Yes.

5 CHAYTOR, Q.C.:

6 Q. So, as the Commissioner said yesterday, this

7 is taking place in real time, I take it, this

8 is what's happening as of 8:24 that evening?

9 MS. MUNDON:

10 A. Yes.

11 CHAYTOR, Q.C.:

12 Q. Okay. So, at least this particular coverage,

13 you certainly were paying attention to. And

14 you forwarded it on that evening and it's, "a

15 patient, Minnie, is a breast cancer patient

16 and, in fact, she's one of the 117 patients

17 who tests were conducted incorrectly. To find

18 out last February that she was tested for

19 positive receptors and realized she should

20 have been on drug for the past eight years was

21 very hard to hear. She's not getting any

22 answers from the doctors. Minnie does not

23 even know how her chemo helped her. The

24 problem that she has with the health care

25 system is that the doctors do not know why the

Page 65

1 problem occurred. How can they correct
 2 something when they cannot pinpoint the
 3 problem questions Minnie. Something went
 4 awfully wrong if for several years people were
 5 being incorrectly for their breast cancer.
 6 Minnie says she will have to enter the
 7 hospital again for her breast cancer. And how
 8 can she be certain that things will be dealt
 9 with in a correct and adequate matter"--I
 10 guess they mean manner. And Minister Osborne
 11 replies to you about an hour later that
 12 evening, "we need to be ready for this as
 13 well". What did you take that comment to
 14 mean, "we need to be ready for this as well",
 15 bearing in mind now that this is December 11
 16 and he's going back into the House on December
 17 12.
 18 MS. MUNDON:
 19 A. I think in terms of the fact that this
 20 individual seems to be losing confidence with
 21 the health system, that he would feel that he
 22 would need to be ready to respond to a
 23 question like that, perhaps in the House.
 24 CHAYTOR, Q.C.:
 25 Q. And Minnie's concern, when I read that arises

Page 66

1 from the fact that they don't know what went
 2 wrong.
 3 MS. MUNDON:
 4 A. Yes.
 5 CHAYTOR, Q.C.:
 6 Q. So, what would the minister have to do to be
 7 ready to respond to that question, "what went
 8 wrong" when he stands in the House the next
 9 day?
 10 MS. MUNDON:
 11 A. Again, you know as I said earlier many times,
 12 I still don't have the answer to that question
 13 and I don't think any of us have the answer to
 14 that question.
 15 CHAYTOR, Q.C.:
 16 Q. Did you go looking for it on the morning of
 17 December 12?
 18 MS. MUNDON:
 19 A. There was a briefing note prepared for
 20 December 12, so I would have talked to Ms.
 21 Hennessey about this particular clipping here
 22 and the minister saying he would need to be
 23 ready.
 24 CHAYTOR, Q.C.:
 25 Q. And what did Ms. Hennessey tell you?

Page 67

1 MS. MUNDON:
 2 A. I can't recall what she would have told me. I
 3 know that the briefing note was prepared.
 4 CHAYTOR, Q.C.:
 5 Q. Yes, and I'll take you to that briefing note,
 6 but does that briefing note contain the answer
 7 for the minister?
 8 MS. MUNDON:
 9 A. As I said, I don't think there is an answer.
 10 CHAYTOR, Q.C.:
 11 Q. Okay. So, it doesn't?
 12 MS. MUNDON:
 13 A. I don't know, no, I can't see how it would
 14 because I'm still not aware of that answer.
 15 CHAYTOR, Q.C.:
 16 Q. So, you went to your job the next morning and
 17 spoke to Ms. Hennessey about this particular
 18 concern.
 19 MS. MUNDON:
 20 A. Yes.
 21 CHAYTOR, Q.C.:
 22 Q. And what did Ms. Hennessey say? Did she say
 23 she'd follow up with Eastern Health, see if we
 24 can get more information? What happened?
 25 MS. MUNDON:

Page 68

1 A. I was looking at it from the perspective of,
 2 you know, this individual losing confidence in
 3 the health system.
 4 CHAYTOR, Q.C.:
 5 Q. Yes, but why is she losing confidence? She's
 6 saying if you don't know what the problem is,
 7 how can you fix it?
 8 MS. MUNDON:
 9 A. Yes, that's correct.
 10 CHAYTOR, Q.C.:
 11 Q. Okay. So, what discussion did you have with
 12 Ms. Hennessey about that?
 13 MS. MUNDON:
 14 A. Just she would have had a copy of this that I
 15 e-mail to her. So, I just would have said
 16 that the minister would have said that "we
 17 need to be ready for this". And I, you know,
 18 a question of people losing confidence in the
 19 health system.
 20 CHAYTOR, Q.C.:
 21 Q. Ms. Mundon, wouldn't the logical thing to do
 22 be for somebody, if the department doesn't
 23 already have the answer, to contact Eastern
 24 Health and ask what information do you have
 25 that can address Minnie's concerns?

Page 69

1 MS. MUNDON:
 2 A. I can't say if Ms. Hennessey may have did that
 3 or not because I didn't prepared the briefing
 4 note.
 5 CHAYTOR, Q.C.:
 6 Q. And I take it, without someone making those
 7 inquiries, it's difficult for the minister,
 8 your minister then to be ready to speak to the
 9 issue, should he be called upon to do so?
 10 MS. MUNDON:
 11 A. If you're asking me should the minister expect
 12 to have information that he needs, then yes.
 13 CHAYTOR, Q.C.:
 14 Q. And I take it that at this point in time, it's
 15 clear to the minister that Eastern Health has
 16 not spoken to the issue of what went wrong.
 17 MS. MUNDON:
 18 A. I would say yes, it would be clear to him at
 19 that time, but again, as I said earlier, they
 20 didn't have an answer to that question in the
 21 November 23 briefing either.
 22 CHAYTOR, Q.C.:
 23 Q. If we could look at P-1097, please. And this
 24 is an e-mail, Ms. Mundon, that you forwarded
 25 to Ms. Matthews, Elizabeth Matthews and Andrea

Page 70

1 Nolan and remind us again, Andrea Nolan is
 2 who?
 3 MS. MUNDON:
 4 A. Communications specialist in the Premier's
 5 office.
 6 CHAYTOR, Q.C.:
 7 Q. Okay. So, she'd be the equivalent to Tara
 8 Furlong in your office, I take it?
 9 MS. MUNDON:
 10 A. Yes.
 11 CHAYTOR, Q.C.:
 12 Q. She would work for Ms. Matthews?
 13 MS. MUNDON:
 14 A. Yes.
 15 CHAYTOR, Q.C.:
 16 Q. And it's December 12, 2006 at 12:34 p.m., so
 17 the next day. "Briefing note for Premier on
 18 ER/PR, Elizabeth/Andrea, for the Premier's
 19 information this issue is in the media today".
 20 So, now this is the morning or just noon or
 21 shortly after noon the day after you've had
 22 your e-mail exchange that evening with
 23 Minister Osborne. And you're forwarding on
 24 the latest briefing note. And if we look at
 25 the attachment here, the briefing note has

Page 71

1 been updated. Drafted, it says, by Ms.
 2 Griffiths, approved by Ms. Hennessey December
 3 12, 2006. And this is, as you've told us, the
 4 House opens at 1:30, so this is shortly before
 5 the House opens.
 6 MS. MUNDON:
 7 A. Yes.
 8 CHAYTOR, Q.C.:
 9 Q. Okay. Why are you forwarding this to the
 10 Premier's staff, for the Premier's attention
 11 or information?
 12 MS. MUNDON:
 13 A. I'm just sending this to Ms. Matthews for her
 14 information given that the House is open.
 15 CHAYTOR, Q.C.:
 16 Q. Is this the first time you would have done
 17 that on the ER/PR issue?
 18 MS. MUNDON:
 19 A. Yes.
 20 CHAYTOR, Q.C.:
 21 Q. Why at this stage are you sending this to the
 22 Premier?
 23 MS. MUNDON:
 24 A. Well, the House of Assembly is open.
 25 CHAYTOR, Q.C.:

Page 72

1 Q. Yes, but the House was open a week before that
 2 too and the House was open -
 3 MS. MUNDON:
 4 A. Because it was following the media briefing.
 5 CHAYTOR, Q.C.:
 6 Q. So, what was it of significance in the media
 7 briefing that you felt warranted sending the
 8 briefing note?
 9 MS. MUNDON:
 10 A. I don't think there would be any one specific
 11 point that would be significant other than the
 12 fact that they had their media briefing and I
 13 was just sending this over to the Premier's
 14 office to Ms. Matthews, for her information.
 15 CHAYTOR, Q.C.:
 16 Q. Did she request it?
 17 MS. MUNDON:
 18 A. No.
 19 CHAYTOR, Q.C.:
 20 Q. So, you just took this on yourself to do that?
 21 MS. MUNDON:
 22 A. Yes.
 23 CHAYTOR, Q.C.:
 24 Q. Okay. Was the issue now in the top five?
 25 MS. MUNDON:

Page 73

1 A. It wasn't, I guess, I'm just trying to make it
 2 clear into how the House of Assembly notes are
 3 ranked. It wouldn't necessarily go--if it
 4 was, say, number six for example, it wouldn't
 5 necessarily be moved in the table of contents
 6 from number six to number five because it was
 7 still identified as number six as a top issue
 8 within that binder.

9 CHAYTOR, Q.C.:

10 Q. I'm sorry it was still?

11 MS. MUNDON:

12 A. It would--just say if it was listed as number
 13 six, for argument's sake, if it was listed as
 14 number six in the table of contents, then I
 15 wouldn't necessarily take it and change the
 16 table of contents and move it up to number
 17 one, two, three, four and five.

18 CHAYTOR, Q.C.:

19 Q. But in your mind, it has shifted up, is that
 20 it? So, that it's become a hot issue?

21 MS. MUNDON:

22 A. In my mind, the House of Assembly is open and
 23 this issue, you know, was in the media the
 24 evening before. I just wanted to make the
 25 Premier's office aware, with the House open,

Page 74

1 thought the Premier should be aware that this
 2 is--here's an updated note on this issue.

3 CHAYTOR, Q.C.:

4 Q. Yes. And I won't take you through all that
 5 because we'll be here all day looking at other
 6 media coverage, but there were other days in
 7 which the House was open and the issue was in
 8 the media. Did you, on those days, also send
 9 along information or briefing notes to the
 10 Premier's office?

11 MS. MUNDON:

12 A. No.

13 CHAYTOR, Q.C.:

14 Q. Why not?

15 MS. MUNDON:

16 A. Because in this case there was a media
 17 briefing.

18 CHAYTOR, Q.C.:

19 Q. So, that was a significant enough event to
 20 prompt you to do this?

21 MS. MUNDON:

22 A. I wanted to be sure that when--I wanted to
 23 make sure that when the House of Assembly was
 24 opened that the Premier's office had received
 25 an updated note on this.

Page 75

1 CHAYTOR, Q.C.:

2 Q. Did you send Ms. Matthews or Ms. Nolan or
 3 anyone else in the Premier's office the
 4 information that had been forwarded to you the
 5 day prior by Eastern Health?

6 MS. MUNDON:

7 A. No, I did not.

8 CHAYTOR, Q.C.:

9 Q. Okay. So why not?

10 MS. MUNDON:

11 A. Well, I would assume that the information
 12 would be contained within the briefing note.

13 CHAYTOR, Q.C.:

14 Q. Okay. And is it? Does the briefing note
 15 spell out that Eastern Health has refused to
 16 disclose certain information?

17 MS. MUNDON:

18 A. No, because I wasn't aware at the time that it
 19 was, and I don't think--I'm not aware if
 20 anyone in the department was aware. Again, I
 21 wasn't looking at the materials that were sent
 22 to by Eastern Health. That's final drafts or
 23 final versions of materials. I wasn't looking
 24 at it from that lens, assuming that
 25 information would not be disclosed. In

Page 76

1 hindsight, had we have known that they were
 2 going to be disclosing would be a different
 3 story.

4 CHAYTOR, Q.C.:

5 Q. Okay.

6 THE COMMISSIONER:

7 Q. I just want to make sure I'm clear once again
 8 on this business of how you deal with issues
 9 within the department and what gets to be
 10 where. As I understood your evidence
 11 yesterday, it really doesn't matter what the
 12 ranking is as long as it's in the top ten in
 13 terms of issues.

14 MS. MUNDON:

15 A. In terms of being priority for the Premier's
 16 office, you mean?

17 THE COMMISSIONER:

18 Q. Well, first within the department.

19 MS. MUNDON:

20 A. Yes.

21 THE COMMISSIONER:

22 Q. I'm concerned within your department.

23 MS. MUNDON:

24 A. Yes.

25 THE COMMISSIONER:

Page 77

1 Q. As you described the process yesterday, it
 2 seemed to me that you were saying that--one of
 3 the following, and perhaps you can tell me
 4 which it is or perhaps it's both, I don't
 5 know, that the first time an issue gets put
 6 into the book -
 7 MS. MUNDON:
 8 A. Yes.
 9 THE COMMISSIONER:
 10 Q. Then it might get put in a place within the
 11 top ten.
 12 MS. MUNDON:
 13 A. Yes.
 14 THE COMMISSIONER:
 15 Q. Which is the concern within the department.
 16 MS. MUNDON:
 17 A. Yes.
 18 THE COMMISSIONER:
 19 Q. The top ten issues are the big thing within a
 20 department, not the top five, that right?
 21 MS. MUNDON:
 22 A. Yes.
 23 THE COMMISSIONER:
 24 Q. Okay. So taking from description of
 25 yesterday, I understood that if you inserted

Page 78

1 something at nine, example, then you wouldn't
 2 bother to move it up to number one even if it
 3 was the number one issue.
 4 MS. MUNDON:
 5 A. No, the relevance of the top five, Madam
 6 Commissioner, is that at the time the House of
 7 Assembly is preparing to open and we're
 8 preparing our materials, the Premier's office
 9 asks all departments to forward the top five
 10 issues. So what the department determined to
 11 be the top five issues at that time, the
 12 briefing notes for those issues would be
 13 forwarded over.
 14 THE COMMISSIONER:
 15 Q. Whether they were in the top five on your list
 16 or not. You see what I mean?
 17 MS. MUNDON:
 18 A. No, they would be in the top five on my list.
 19 THE COMMISSIONER:
 20 Q. All right. Okay. I'd better start again
 21 because, obviously, I didn't understand what
 22 you said yesterday. You were describing how
 23 within the department you kept, as I
 24 understood it, a list of issues. This is
 25 primarily for the purpose of your Minister so

Page 79

1 that he would--to make sure that the Minister
 2 was apprised of all the necessary information
 3 relating to these issues which seem to be at
 4 that point determined by somebody to be the
 5 most likely issues on which he might have to
 6 answer questions. Is that how you determine
 7 whether they were in the top ten? I'm more
 8 concerned about ten for now.
 9 MS. MUNDON:
 10 A. Okay. I'm just going to clarify. I'm just
 11 going to try to start over again here and
 12 clarify this for everybody.
 13 THE COMMISSIONER:
 14 Q. Okay.
 15 MS. MUNDON:
 16 A. If I could go back to - let's just say that
 17 I'm getting ready for the House opening and
 18 preparing a master list of all the issues that
 19 we will prepare briefing notes on.
 20 THE COMMISSIONER:
 21 Q. Yes.
 22 MS. MUNDON:
 23 A. So the list would be done in consultation with
 24 the Deputy Minister. So I prepare a list.
 25 THE COMMISSIONER:

Page 80

1 Q. Yes.
 2 MS. MUNDON:
 3 A. You know, could be 40 items on that list.
 4 THE COMMISSIONER:
 5 Q. Uh-hm.
 6 MS. MUNDON:
 7 A. So that mean 40 briefing to be prepared. So
 8 within that list of 40 items, I would then
 9 discuss with the Deputy Minister the items
 10 that he would feel would be the top five
 11 issues for the Premier's office, and those
 12 notes would have to be done and prepared and
 13 signed off in advance of the remaining notes.
 14 THE COMMISSIONER:
 15 Q. Uh-hm.
 16 MS. MUNDON:
 17 A. So we have the top five issues for the Table
 18 of Contents. So then when I put the Table of
 19 Contents together, what is perceived by the
 20 Deputy Minister and myself to be the top
 21 issues within the department - whether that be
 22 10, whether that be 15 - they would be listed
 23 on the Table of Contents at the very top as
 24 top issues. So they would be listed in that
 25 order, and then down below in the Table of

Page 81

1 Contents, the remaining issue, shall we say,
 2 would be broken down by the division. So any
 3 other issues pertaining to a particular
 4 division will be categorized in that way. So
 5 if the Minister was looking for a note on
 6 another particular issue that he would find it
 7 there. However, these issues in the top of
 8 the Table of Contents classified as top
 9 issues, notes, would be the ones that would be
 10 put at the top of the Table of Contents so
 11 that the Minister would see them in his view.

12 THE COMMISSIONER:
 13 Q. And how many of those are there?

14 MS. MUNDON:
 15 A. It depends on the particular House session.
 16 It could be 15.

17 THE COMMISSIONER:
 18 Q. All right.

19 MS. MUNDON:
 20 A. Could be 10, could 15.

21 THE COMMISSIONER:
 22 Q. And that decision is made at the beginning of
 23 the House session.

24 MS. MUNDON:
 25 A. Yes.

Page 82

1 THE COMMISSIONER:
 2 Q. Okay. Now I'm assuming that life doesn't
 3 always follow a nice neat order, and that
 4 maybe week two into the House session all of a
 5 sudden something that you and the Deputy
 6 Minister in your wisdom might have concluded
 7 was not a top issue becomes a top issue.

8 MS. MUNDON:
 9 A. Uh-hm. Yes.

10 THE COMMISSIONER:
 11 Q. As I understood it yesterday, that doesn't
 12 mean you really much change anything in terms
 13 of the way the book is organized.

14 MS. MUNDON:
 15 A. That's right.

16 THE COMMISSIONER:
 17 Q. Was I wrong about that?

18 MS. MUNDON:
 19 A. That's correct.

20 THE COMMISSIONER:
 21 Q. I mean, as long as the Minister knows that
 22 even though it might not have been given a
 23 particular number when you were beginning to
 24 prepare for the House - indeed, it might not
 25 have even been on your radar when you were

Page 83

1 getting prepared for the House.

2 MS. MUNDON:
 3 A. Yes.

4 THE COMMISSIONER:
 5 Q. As long as he knows that in his book, or she
 6 knows that it's in her book, as the case may
 7 be, but in your case, in the case we're
 8 dealing with, that always would have been men.

9 MS. MUNDON:
 10 A. Uh-hm.

11 THE COMMISSIONER:
 12 Q. As long as they know there's a briefing note
 13 in there, it doesn't matter whether it's one,
 14 two, three, four, five or under heading "X"
 15 from division "Y". Is that correct?

16 MS. MUNDON:
 17 A. No. If it was considered to be a top issue -
 18 like the way the Table of Contents is done,
 19 there are empty tabs left in the Table of
 20 Contents.

21 THE COMMISSIONER:
 22 Q. Okay.

23 MS. MUNDON:
 24 A. So, for example, top issues - we know that as
 25 the Session goes along, there are going to be

Page 84

1 issues that will arise for the Minister that
 2 we would consider to be top issues.

3 THE COMMISSIONER:
 4 Q. Okay.

5 MS. MUNDON:
 6 A. Not necessarily the top five issues, but
 7 certainly top issues that would set them
 8 aside.

9 THE COMMISSIONER:
 10 Q. Okay.

11 MS. MUNDON:
 12 A. So the Table of Contents has a number of blank
 13 spots, shall we say.

14 THE COMMISSIONER:
 15 Q. Uh-hm.

16 MS. MUNDON:
 17 A. Perhaps like seven or eight blank spots. And
 18 as issues would then arise that we would
 19 assess to be top issues, then we would add
 20 them in, say, as number nine, you know, or
 21 number ten or number eleven.

22 THE COMMISSIONER:
 23 Q. Okay.

24 MS. MUNDON:
 25 A. In that way.

Page 85

1 THE COMMISSIONER:
 2 Q. All right. And so there is for the purpose of
 3 informing your Minister a process by which he
 4 can have inserted in his briefing book issues
 5 which arise during the course of the running
 6 of the House of Assembly.
 7 MS. MUNDON:
 8 A. Yes.
 9 THE COMMISSIONER:
 10 Q. All right. But in the meantime, the top five
 11 issues that would have been sent to the
 12 Premier's office were assessed at the
 13 beginning of the--when the House is opening.
 14 MS. MUNDON:
 15 A. Yes.
 16 THE COMMISSIONER:
 17 Q. If an item got added to a Minister's book and,
 18 indeed, the department thought, "Boy, this is
 19 the biggest thing we are dealing with at the
 20 moment," would you communicate to the
 21 Premier's office that, in addition to the top
 22 five we told you about--would you communicate
 23 to the Premier's office that in addition to
 24 the top five we told you about, here's
 25 something else you should know about, or would

Page 86

1 you wait until the next opening of the House
 2 of Assembly and assess whether or not it was a
 3 top issue at that point.
 4 MS. MUNDON:
 5 A. No, I think it's fair to say, Madam
 6 Commissioner, that I would take direction from
 7 the Minister and the Deputy Minister on that
 8 point. So, in other words, if there were an
 9 issue that arose that they felt that the
 10 Premier's office would need to be aware of,
 11 then I would on their direction send a
 12 briefing note over on that issue.
 13 THE COMMISSIONER:
 14 Q. And the decision as to whether or not the
 15 Premier's office needed to be made aware of it
 16 would be made by just those two people?
 17 MS. MUNDON:
 18 A. Yes.
 19 THE COMMISSIONER:
 20 Q. Then does that mean that - you see, there's
 21 sort of official route for things and then
 22 there's a different route, as it were? Is
 23 that sort of the Minister just sort of
 24 casually saying to you, or the Deputy Minister
 25 saying to you, "By the way, I think this issue

Page 87

1 is now so important that we ought to identify
 2 it as one of our top issues," or is this you
 3 saying on a communications basis to somebody
 4 up the line that, "I'm just giving you a heads
 5 up," that "you might you might get questions
 6 on that." That seems to me to be two
 7 different approaches with perhaps given two
 8 different levels of importance?
 9 MS. MUNDON:
 10 A. The official route certainly would be for the
 11 Minister or the Deputy Minister to go through
 12 Cabinet Secretariat and then through the
 13 Premier's office that way, and that's the way
 14 that normal, general issues briefing notes,
 15 shall we say, would be routed.
 16 THE COMMISSIONER:
 17 Q. Uh-hm.
 18 MS. MUNDON:
 19 A. With respect to the House of Assembly briefing
 20 binder, the channel is a bit different in the
 21 fact that the original e-mail from the
 22 Communications Specialist in the Premier's
 23 office to Communications Directors asking them
 24 to get the top five issues--identify the top
 25 five issues and forward the briefing notes

Page 88

1 over. So instead of going through that
 2 official route -
 3 THE COMMISSIONER:
 4 Q. Uh-hm.
 5 MS. MUNDON:
 6 A. The way general issues briefing notes would,
 7 they would go through by the Communications
 8 Directors in consultation with the Minister
 9 and the Deputy Minister. So in this
 10 particular case, you know, if there was
 11 something, an issue that did arise, that--it
 12 was assessed by the Minister and the Deputy
 13 Minister that the Premier would need to be
 14 apprised of, then they would ask me to forward
 15 that up in the same manner that the other
 16 House of Assembly briefing notes were sent.
 17 THE COMMISSIONER:
 18 Q. And would you ever make that assessment
 19 yourself?
 20 MS. MUNDON:
 21 A. In this case, I did - in the case of the
 22 December 12th note.
 23 THE COMMISSIONER:
 24 Q. So you see the December 12th note in the same
 25 light as a notification that this is one of

Page 89

1 the top issues.
 2 MS. MUNDON:
 3 A. I see it as an issue that I certainly think
 4 that the Premier should be aware of, given
 5 that the House of Assembly is open, that the
 6 media briefing has occurred and that there's
 7 news coverage on the issue.
 8 THE COMMISSIONER:
 9 Q. Sorry, Ms. Chaytor, I interrupted again.
 10 CHAYTOR, Q.C.:
 11 Q. So, Ms. Mundon, nobody has told you to send
 12 the note. You took that on your own.
 13 MS. MUNDON:
 14 A. Yes.
 15 CHAYTOR, Q.C.:
 16 Q. Was anyone in the department aware that you
 17 sent the note to the Premier?
 18 MS. MUNDON:
 19 A. I think I would have told the Minister and the
 20 Deputy Minister that I had sent the note.
 21 CHAYTOR, Q.C.:
 22 Q. Okay. And this was in the news coverage, so
 23 you were following the media coverage enough
 24 to know that this was a subject of some
 25 discussion in the media.

Page 90

1 MS. MUNDON:
 2 A. Yes.
 3 CHAYTOR, Q.C.:
 4 Q. In looking at this note, we have "anticipated
 5 questions on key messages," and were you
 6 involved that day in the updating of the note
 7 and drafting this--or some of this
 8 information?
 9 MS. MUNDON:
 10 A. I assume that I would have been.
 11 CHAYTOR, Q.C.:
 12 Q. Okay, and the normal parts that you've told us
 13 before you'd be involved in are the
 14 anticipated questions and the key messages.
 15 MS. MUNDON:
 16 A. Yes.
 17 CHAYTOR, Q.C.:
 18 Q. And you've indicated "why has it taken more
 19 than one year for Eastern Health to go public
 20 and release the results? What is the rate of
 21 error?" is there as a question. And in the
 22 key messages and suggested responses is there
 23 any answer to what is the rate of error?
 24 MS. MUNDON:
 25 A. No, there's no answer there.

Page 91

1 CHAYTOR, Q.C.:
 2 Q. Okay, and why not?
 3 MS. MUNDON:
 4 A. In terms of the key messages?
 5 CHAYTOR, Q.C.:
 6 Q. Well, in terms of anywhere in the note, you
 7 know, to make sure that the question is posed,
 8 it's an important question for the Minister,
 9 and now in this case, for the Premier in case
 10 a question is posed to him in the House, "what
 11 is the rate of error?" So it's been
 12 identified as an important issue or one that
 13 may come up. So where in the briefing note
 14 would the answer be? It's not there.
 15 MS. MUNDON:
 16 A. The only thing I can see there that could be
 17 an answer is since legal proceedings have
 18 initiated, we will have to allow the legal
 19 process to determine if, in fact, an error
 20 occurred, which would have been taken from the
 21 key messages document.
 22 CHAYTOR, Q.C.:
 23 Q. Okay, that's in the key messages document?
 24 MS. MUNDON:
 25 A. Yes.

Page 92

1 CHAYTOR, Q.C.:
 2 Q. Okay, let's go back to 0104, P-0104, you mean
 3 that's taken from Eastern Health's key
 4 messages document?
 5 MS. MUNDON:
 6 A. Yes.
 7 CHAYTOR, Q.C.:
 8 Q. Okay, and let's go back to P-0104, and the key
 9 messages was early on. Do you want to point
 10 out for us where you see that?
 11 MS. MUNDON:
 12 A. Right there.
 13 CHAYTOR, Q.C.:
 14 Q. Okay. We have "error is a matter for the
 15 legal system and our quality review processes
 16 to determine." So that's what you're
 17 referring to?
 18 MS. MUNDON:
 19 A. Yes, and again, I knew that Eastern Health had
 20 issues with the term "error".
 21 CHAYTOR, Q.C.:
 22 Q. If we could have page 30 of that document,
 23 please? Question nine, Ms. Mundon, that I
 24 referred you to earlier. "Now that legal
 25 proceedings have been initiated, we will have

Page 93

1 to allow the legal process to determine if, in
 2 fact, error has occurred." That's verbatim.
 3 It was actually taken from the question and
 4 answers of Eastern Health's media technical
 5 briefing. So I take it as of December 12th,
 6 you had read the document enough to be able to
 7 take a portion of it out, this question nine
 8 out, and insert it in the key messages of the
 9 briefing note.
 10 MS. MUNDON:
 11 A. I can't recall reading that document, and I
 12 can't say for certain that I inserted all of
 13 those key messages within that briefing note
 14 because there is an e-mail previously that you
 15 will see where Ms. Hennessey forwards a
 16 complete package of materials to the drafter
 17 of the briefing note, which is Ms. Griffiths.
 18 CHAYTOR, Q.C.:
 19 Q. Okay, but your responsibility on those
 20 briefing notes is the key messages and the
 21 anticipated questions?
 22 MS. MUNDON:
 23 A. But as I said to you earlier, there are
 24 occasions where the key messages may have
 25 already been--the staff may have already taken

Page 94

1 like a stab at drafting those messages, and
 2 the same thing with some of the questions. So
 3 given that the House of Assembly was open that
 4 day, it's quite possible that that language
 5 was inserted in there in response to the
 6 questions that I may have put in proposed.
 7 CHAYTOR, Q.C.:
 8 Q. If we could go back then to P-0197, please?
 9 So someone in the Department, you can't recall
 10 if it's you or not, but somebody in the
 11 Department, in finalizing those key messages,
 12 read the materials well enough to include a
 13 portion of question nine in the briefing note?
 14 MS. MUNDON:
 15 A. Yes, and I believe that if I would have read
 16 through those materials that I would have been
 17 alerted to this fact, and as I said to you
 18 earlier, at no point in time do I ever
 19 remember being aware of the fact that Eastern
 20 Health had not disclosed all the information
 21 in that fact sheet.
 22 CHAYTOR, Q.C.:
 23 Q. "What is the rate of error?" and as we
 24 discussed, the question is not answered. Come
 25 to "the details on the test results are as

Page 95

1 follows:" and we have the three numbers which
 2 Eastern Health has seen fit to release the day
 3 prior, 2760, 939, 117. The other numbers that
 4 were in the November 23rd briefing note, which
 5 would be in the possession of the Department,
 6 those numbers aren't included for this
 7 briefing note, which has now gone to the
 8 Premier. Do you know why that was?
 9 MS. MUNDON:
 10 A. No, I don't. I'm not involved with the
 11 preparation of the rest of the briefing note.
 12 CHAYTOR, Q.C.:
 13 Q. And in coming up with the question though,
 14 "what is the rate of error?" and you've been
 15 tuned into that being a key question now for
 16 quite some time -
 17 MS. MUNDON:
 18 A. Yes.
 19 CHAYTOR, Q.C.:
 20 Q. - "what is the rate of error?" and in putting
 21 that forward, why wouldn't the information be
 22 forwarded on to the Premier in this case so
 23 that that question could be answered? The
 24 numbers were in the Department on November
 25 23rd.

Page 96

1 MS. MUNDON:
 2 A. Why wasn't that information included in the
 3 background?
 4 CHAYTOR, Q.C.:
 5 Q. Yes.
 6 MS. MUNDON:
 7 A. I can't answer that.
 8 CHAYTOR, Q.C.:
 9 Q. No, thinking about, you know, you've said that
 10 it's important that if the information exists,
 11 and you've said this to me over the past day
 12 or so, that if the information exists to
 13 answer the questions that you think are
 14 pertinent -
 15 MS. MUNDON:
 16 A. Yes.
 17 CHAYTOR, Q.C.:
 18 Q. - then it should be included in the briefing
 19 note.
 20 MS. MUNDON:
 21 A. Yes.
 22 CHAYTOR, Q.C.:
 23 Q. I'm suggesting well, the answer did exist and
 24 was in the possession of the Department on the
 25 November 23rd briefing note, and you would

Page 97

1 know that. You had that document yourself?

2 MS. MUNDON:

3 A. Yes.

4 CHAYTOR, Q.C.:

5 Q. And I'm wondering then why isn't the question

6 answered?

7 MS. MUNDON:

8 A. I can't answer that question. I don't know.

9 I don't recall why it wouldn't have been

10 answered. I can tell you that there would

11 certainly be no effort on my part or anyone in

12 the Department to intentionally mislead the

13 Premier's office or the Minister or anyone for

14 that matter.

15 CHAYTOR, Q.C.:

16 Q. Okay. But in terms of having the information,

17 any information that might be able to assist

18 in the answer, that information was within the

19 Department?

20 MS. MUNDON:

21 A. I think, in hindsight, that the page that we

22 were given in that briefing, the November 23rd

23 briefing, that that page being attached to

24 this briefing note would have been extremely

25 helpful. Again, I don't recall at any time

Page 98

1 those numbers ever being analyzed within the

2 Department or by Eastern Health and I

3 specifically remember from that briefing with

4 them that they, you know, verbally mentioned

5 the number, the 2700 number and the 117 number

6 as it became, and three percent margin of

7 error.

8 CHAYTOR, Q.C.:

9 Q. Did you receive--after forwarding this

10 briefing note on to Ms. Matthews and Ms.

11 Nolan, did you receive any comment back or any

12 questions?

13 MS. MUNDON:

14 A. No, I did not.

15 CHAYTOR, Q.C.:

16 Q. And the fact that it's only this briefing note

17 that you're sending on, there aren't five or

18 four others, can we read anything into that?

19 MS. MUNDON:

20 A. That I'm only sending this briefing note on

21 this issue and I'm not sending any others?

22 CHAYTOR, Q.C.:

23 Q. Yes, that there--you know, if it's a matter of

24 informing the Premier what the top five are

25 for the day, this is the only briefing note

Page 99

1 that went, I take it?

2 MS. MUNDON:

3 A. We don't inform the Premier's office of the

4 top five issues for the day. We inform the

5 Premier's office of the top five issues prior

6 to the House of Assembly opening. That's it.

7 CHAYTOR, Q.C.:

8 Q. So on December 12th, only one briefing note is

9 going forward in your e-mail. I would think

10 if you were going to send three or four,

11 they'd be all attached to the same e-mail. We

12 only have one going forward.

13 MS. MUNDON:

14 A. That's right.

15 CHAYTOR, Q.C.:

16 Q. So can we read anything into that?

17 MS. MUNDON:

18 A. No, absolutely not. I had already forwarded

19 the top five issues previously before the

20 House opened that session.

21 CHAYTOR, Q.C.:

22 Q. So the ER/PR, if it were in the top five that

23 were sent on previously, this is either an

24 updated version of it or it's now in the top

25 five?

Page 100

1 MS. MUNDON:

2 A. I guess so, yes.

3 CHAYTOR, Q.C.:

4 Q. If we could look at P-1612, please? And in

5 sending on the briefing note to the Premier's

6 office, did you also send it to Ms. Cheeseman?

7 MS. MUNDON:

8 A. No, I did not.

9 CHAYTOR, Q.C.:

10 Q. Okay, and why not?

11 MS. MUNDON:

12 A. Just that that wasn't normally the process, in

13 terms of forwarding the top five issues notes.

14 So I wouldn't have sent that note.

15 CHAYTOR, Q.C.:

16 Q. And is your recollection that--I believe

17 you've told us that ER/PR, as best you can

18 recall, was not in the top five?

19 MS. MUNDON:

20 A. That's right.

21 CHAYTOR, Q.C.:

22 Q. Up until this point in time?

23 MS. MUNDON:

24 A. That's correct.

25 CHAYTOR, Q.C.:

Page 101

1 Q. What changed the status? What happened?
 2 MS. MUNDON:
 3 A. And again, you know, I did not classify in
 4 this e-mail to Elizabeth, this being added to
 5 the top five. I put in that e-mail that this
 6 is in the media and for the Premier's
 7 attention.
 8 CHAYTOR, Q.C.:
 9 Q. Yes, and what gave it that status though?
 10 MS. MUNDON:
 11 A. Well, as I indicated earlier, just the fact
 12 that the House of Assembly was open and that
 13 this issue was in the media, that there was a
 14 media briefing.
 15 THE COMMISSIONER:
 16 Q. Do I take it then that if there's an issue
 17 having to do with Health in the media, you
 18 would always send a note to the Premier's
 19 office, just in case the Premier might be
 20 asked a question about it?
 21 MS. MUNDON:
 22 A. Issues that, you know, I would assess that
 23 would be important enough, yes. I mean, not
 24 every issue, Madame Commissioner, that would
 25 be in the media, because I would be sending

Page 102

1 briefing notes over to the Premier's office
 2 every day. But something like this where
 3 there was a technical briefing and there was
 4 media coverage following, with the House of
 5 Assembly being open and the fact that it
 6 wasn't in the top five issues already, then I
 7 would have provided that note.
 8 THE COMMISSIONER:
 9 Q. Okay. So it's your judgment call. If
 10 something is not in the top five, as you point
 11 out, I would assume that in Health, perhaps
 12 more than any other department, certainly
 13 would be way up there in terms of a department
 14 whose issues would normally attract media
 15 attention.
 16 MS. MUNDON:
 17 A. Yes.
 18 THE COMMISSIONER:
 19 Q. So that I'm assuming that most days there is,
 20 somewhere within the newspapers or in a story
 21 on one of the local channels or for that
 22 matter, in a talk show, commentary on
 23 something that has to do with a Health issue.
 24 MS. MUNDON:

Page 103

1 A. Um-hm.
 2 THE COMMISSIONER:
 3 Q. So what determines how it gets to be of
 4 sufficient importance to warrant bringing it
 5 to the attention of the Premier's office?
 6 MS. MUNDON:
 7 A. I don't think there's any like set protocols
 8 or anything for that, Madame Commissioner.
 9 It's a judgment call.
 10 THE COMMISSIONER:
 11 Q. That's what I've been trying to determine is
 12 what is it about it, other than so far most
 13 people are talking in terms of their gut
 14 reaction. So I'm just seeking someone to
 15 articulate the basis upon which it determines,
 16 in terms of the priority of the issues or the
 17 importance of the issues, so that they get
 18 that kind of attention.
 19 MS. MUNDON:
 20 A. In assessing the top five issues, it's a
 21 judgment call made primarily by the Deputy
 22 Minister and the Minister, in terms of what
 23 they would see to be the top issues that the
 24 Premier should be aware of. In this case,
 25 given that this issue was not sent over as

Page 104

1 part of the top five, and if it had been, then
 2 this would be an updated note as opposed to a
 3 new note. So in this instance, I made a
 4 judgment call that I thought that the
 5 Premier's office should be aware of this
 6 issue.
 7 THE COMMISSIONER:
 8 Q. Yes, and you cited as the basis for doing so
 9 the briefing the prior day, one of the reasons
 10 that you chose to bring it to the attention of
 11 the Premier's office on that day was because
 12 there had been this media briefing?
 13 MS. MUNDON:
 14 A. Yes.
 15 THE COMMISSIONER:
 16 Q. Was there anything else about it that caused
 17 you to make that judgment call?
 18 MS. MUNDON:
 19 A. No, other than the fact that it hadn't been in
 20 the original top five issues.
 21 THE COMMISSIONER:
 22 Q. Okay, thank you.
 23 CHAYTOR, Q.C.:
 24 Q. Thank you, Commissioner. Would it have
 25 anything to do with Minister Osborne's e-mail

Page 105

1 response to you the night before "we need to
 2 be ready for this"?

3 MS. MUNDON:
 4 A. No, it didn't.

5 CHAYTOR, Q.C.:
 6 Q. If we could have P-1612? Thank you. We
 7 already have that one. This is an e-mail from
 8 you, Ms. Mundon, to Mary St. Croix. Who's
 9 Mary St. Croix?

10 MS. MUNDON:
 11 A. She's a secretary within the Communications
 12 division in the Department.

13 CHAYTOR, Q.C.:
 14 Q. Okay. December 12th 2006 at 12:40 p.m. So
 15 it's just a few minutes after your e-mail to
 16 Ms. Matthews and Ms. Nolan. You're forwarding
 17 the updated, so it is an updated House of
 18 Assembly briefing note, ER/PR, retesting of
 19 breast cancer patients. "Mary, please take
 20 eight copies ASAP." What was that all about?
 21 Who are the eight copies for?

22 MS. MUNDON:
 23 A. We have--during the House sessions, we have a
 24 daily briefing with the Minister for an hour
 25 prior to the House of Assembly opening each

Page 106

1 day, and during that briefing, essentially we
 2 would provide the Minister with updated
 3 briefing notes or new briefing notes on
 4 issues, and it would--and the eight people
 5 would be the senior executive of the
 6 Department, and it provides the Minister with
 7 an opportunity to get updated information and
 8 to ask any relevant questions that he may have
 9 had.

10 CHAYTOR, Q.C.:
 11 Q. Okay, and so on this particular day, and this
 12 seems to be the only e-mail we have like this,
 13 but so this would be a routine for you to ask
 14 Ms. St. Croix to make eight copies?

15 MS. MUNDON:
 16 A. Yes. However, sometimes I would probably just
 17 be literally passing by her desk and ask her
 18 to make copies, as opposed to sending an e-
 19 mail.

20 CHAYTOR, Q.C.:
 21 Q. Doesn't--well, why not just e-mail everybody?
 22 You forwarded the briefing note to Ms. St.
 23 Croix. Why not just e-mail everyone and
 24 forward a copy?

25 MS. MUNDON:

Page 107

1 A. Because the briefing occurs an hour before the
 2 House takes place. So at this point, it's
 3 12:40. The House would open at 1:30 and a lot
 4 of times people don't check their e-mail that
 5 fast and they have to go to their own printer
 6 and print it off. So it was just easier for
 7 me to bring copies of all the updated notes to
 8 the meeting with me, to the briefing.

9 CHAYTOR, Q.C.:
 10 Q. And that's what you did?

11 MS. MUNDON:
 12 A. And that's what I did.

13 CHAYTOR, Q.C.:
 14 Q. Okay. So what time is the meeting?

15 MS. MUNDON:
 16 A. The briefing is normally scheduled for
 17 anywhere from 12 to 12:30.

18 CHAYTOR, Q.C.:
 19 Q. Yes.

20 MS. MUNDON:
 21 A. So this was 12:40, so you know, we're a few
 22 minutes behind or whatever. It may have
 23 started 12:45.

24 CHAYTOR, Q.C.:
 25 Q. And so the Minister, up to this point in time,

Page 108

1 doesn't have his updated briefing note?

2 MS. MUNDON:
 3 A. That's correct.

4 CHAYTOR, Q.C.:
 5 Q. At the briefing then that day when everybody
 6 sat around with copies of the updated briefing
 7 note, what was discussed about this issue?

8 MS. MUNDON:
 9 A. I can't recall now specifically what would
 10 have been discussed. We have these briefing
 11 sessions every day while the House is opened.
 12 So -

13 CHAYTOR, Q.C.:
 14 Q. But this is an issue that--and I don't see any
 15 other. You're not asking her to make eight
 16 copies of any other briefing note for any
 17 other issue.

18 MS. MUNDON:
 19 A. No, because I probably already had copies of
 20 the other notes.

21 CHAYTOR, Q.C.:
 22 Q. So this is the only one updated that day,
 23 you're saying.

24 MS. MUNDON:
 25 A. No, I'm just saying that the other notes were

Page 109

1 probably updated earlier in the day and then I
 2 probably already had copies of those notes.
 3 This one was being done and so I said to her,
 4 "Please take eight copies ASAP" because we're
 5 getting close now to the time that the House
 6 of Assembly is opening.
 7 CHAYTOR, Q.C.:
 8 Q. So what was discussed then when you sat around
 9 that day, what was pertinent on the issue,
 10 what was discussed?
 11 MS. MUNDON:
 12 A. I can't remember specifically what would have
 13 been discussed. I can tell you that normally
 14 in the briefings that the minister would--
 15 basically the ADM who is responsible would
 16 tell the minister which issues were, whether
 17 they be new issues or updated issues, what
 18 were relevant, and they would just go through
 19 with the minister what was new on an issue,
 20 and from there the minister would then ask
 21 questions that he felt would be relevant to -
 22 CHAYTOR, Q.C.:
 23 Q. And the fact that this issue had been
 24 elevated, at least in your mind, to the point
 25 of forwarding the briefing note on to the

Page 110

1 Premier's office, I take it the ER/PR issue
 2 that morning or that afternoon now would have
 3 been the subject of some discussion in the
 4 briefing for the minister?
 5 MS. MUNDON:
 6 A. I would certainly assume that to be the case,
 7 yes.
 8 CHAYTOR, Q.C.:
 9 Q. And would the subject of your e-mail exchange
 10 the night before with the minister likely have
 11 been discussed?
 12 MS. MUNDON:
 13 A. It may or may not have.
 14 CHAYTOR, Q.C.:
 15 Q. Well, what do you think, it's the minister
 16 saying we need to be ready for this, so isn't
 17 it likely that that was discussed?
 18 MS. MUNDON:
 19 A. It may have been. I can't recall if it was or
 20 not.
 21 CHAYTOR, Q.C.:
 22 Q. Well, is it likely?
 23 MS. MUNDON:
 24 A. I can't say if it was likely given the fact
 25 that there are numerous media clippings and

Page 111

1 articles sent to the minister in a daily basis
 2 and he may come back with a comment like that
 3 about a number of different issues.
 4 CHAYTOR, Q.C.:
 5 Q. Yes, well, if he did it on this, we don't see
 6 it too often. The minister has said we need
 7 to be ready for this, you're briefing him to
 8 go into the house. Was there discussion on
 9 the issue of what happened, what went wrong?
 10 That's what he was talking about what we need
 11 to be ready for from the clippings that we've
 12 looked at, Minnie's concerns being how can we
 13 basically have confidence if they don't know
 14 what went wrong, how can they fix it? So was
 15 that discussed?
 16 MS. MUNDON:
 17 A. I can't remember the specifics of that
 18 briefing that day.
 19 CHAYTOR, Q.C.:
 20 Q. And in the briefing would the minister be told
 21 about what's happened in the media over the
 22 past evening or past day with respect to this
 23 issue?
 24 MS. MUNDON:
 25 A. The minister would be provided clippings of

Page 112

1 media coverage.
 2 CHAYTOR, Q.C.:
 3 Q. So any media on the issue would have been
 4 provided to the minister that day?
 5 MS. MUNDON:
 6 A. That we would have access to. Again, it would
 7 depend on if we had transcripts of all the
 8 television, for example, articles. Certainly
 9 the ones that I would have sent to him, he
 10 would have copies of.
 11 CHAYTOR, Q.C.:
 12 Q. When you are at work past the evening news
 13 hour, so do you watch the news from work?
 14 MS. MUNDON:
 15 A. It depends on how long I'm at work, if I'm in
 16 a meeting or if I'm otherwise engaged.
 17 CHAYTOR, Q.C.:
 18 Q. And if you miss the news, how do you bring
 19 yourself up to speed on what's happened?
 20 MS. MUNDON:
 21 A. There would be a--as we saw yesterday, a
 22 little synopsis from Open Line, we receive the
 23 same sorts of synopsis for all media
 24 throughout the day, so like one or two line
 25 summary on media coverage.

Page 113

1 CHAYTOR, Q.C.:

2 Q. Yes. And do you ever go on line then to see

3 what the latest headlines are from CBC, for

4 example?

5 MS. MUNDON:

6 A. Yes. And that article that I forwarded would

7 have been one of those cases.

8 CHAYTOR, Q.C.:

9 Q. Yes. If we could have P-0279, please? Now,

10 Ms. Mundon, I'm about to skip forward here,

11 unless there's something else that you can

12 tell us, but the next documentation that we

13 have involving you is almost three months

14 later, March 5th, 2007. Is there anything

15 that happened afterwards, in December? I take

16 it the minister went into the house on

17 December 12th and there were no questions

18 asked of him on the ER/PR?

19 MS. MUNDON:

20 A. Correct, and the house would have closed that

21 day.

22 CHAYTOR, Q.C.:

23 Q. And no media inquiries were received?

24 MS. MUNDON:

25 A. No.

Page 114

1 CHAYTOR, Q.C.:

2 Q. Okay. And so then the issue continues on

3 through December, January. Did you hear

4 anything in the department around this issue

5 in December, after the media briefing, after

6 December 12th on through January, February,

7 did you hear anything on this issue?

8 MS. MUNDON:

9 A. No.

10 CHAYTOR, Q.C.:

11 Q. Within the department or outside the

12 department within government at all?

13 MS. MUNDON:

14 A. No.

15 CHAYTOR, Q.C.:

16 Q. Okay. Did you have any discussions in that

17 interim with Ms. Bonnell on the issue?

18 MS. MUNDON:

19 A. Not that I recall, no.

20 CHAYTOR, Q.C.:

21 Q. And coming in then, I take it, into March of

22 2007 you have a new minister again?

23 MS. MUNDON:

24 A. Yes.

25 CHAYTOR, Q.C.:

Page 115

1 Q. Okay. Before I go to the 2007 then time

2 period, in dealing with Minister Ottenheimer

3 and Minister Osborne on the ER/PR issue, did

4 you observe any difference in their level of

5 involvement?

6 MS. MUNDON:

7 A. Yes, I would say that both ministers would

8 have a different style. I would say that

9 Minister Ottenheimer, his style was more high

10 level, whereas Minister Osborne tended to

11 request more information on issues.

12 CHAYTOR, Q.C.:

13 Q. Okay. So was he more, if you like, a direct

14 hands on approach to dealing with the issue?

15 MS. MUNDON:

16 A. I would say that would be a fair assessment,

17 yes.

18 CHAYTOR, Q.C.:

19 Q. And did he ask more questions of you or ask

20 you to seek out more answers to questions than

21 Minister Ottenheimer had?

22 MS. MUNDON:

23 A. I would say that would be a fair comment, as

24 well.

25 CHAYTOR, Q.C.:

Page 116

1 Q. Now, if we look at 0279, this is an e-mail

2 from yourself to a number of individuals. Are

3 all those individuals within the department?

4 MS. MUNDON:

5 A. Yes, they are.

6 CHAYTOR, Q.C.:

7 Q. Okay. And it includes, of course, some names

8 that are familiar to us, Dr. Bradbury, Ms.

9 Hennessey, Dr. Hunt. And it's Monday, March

10 5th, 2007 at 9:38 a.m. and it's House of

11 Assembly briefing notes is the subject. "Good

12 morning. Just a reminder that House of

13 Assembly briefing notes for the Premier on top

14 issues are due by end of today." And then you

15 go on to say, "Also, as promised, there is the

16 longer list of briefing notes required for the

17 minister's House of Assembly briefing binder.

18 Please note that these should also follow the

19 standard question and answer format (template

20 attached). If you require me to write

21 questions for the briefing notes, please

22 advise ASAP. And please note that these notes

23 are due by the end of the day on March 9th."

24 Why would you be the person reminding the

25 staff that the briefing notes are due?

Page 117

1 MS. MUNDON:
 2 A. Well, as I indicated earlier, that was one of
 3 my roles in the department was preparing,
 4 putting together the briefing binder for the
 5 minister.
 6 CHAYTOR, Q.C.:
 7 Q. Okay. And you indicate here that the format
 8 that should be followed. So is that also part
 9 of your responsibility, to let them know the
 10 format that would be followed in drafting the
 11 briefing notes?
 12 MS. MUNDON:
 13 A. I just, I did that because I found on
 14 occasion when I was putting together--when I
 15 would be receiving the notes, that they would
 16 be in the wrong format on occasion, so what I
 17 did then was to remind people of the format
 18 and to attach it.
 19 CHAYTOR, Q.C.:
 20 Q. Okay. And then most of what we see here is
 21 blocked out because it's not part, it's not
 22 relevant to what we're dealing with. But we
 23 do see ER/PR status?
 24 MS. MUNDON:
 25 A. Yes.

Page 118

1 CHAYTOR, Q.C.:
 2 Q. And then "As a reminder, here are the top
 3 issues notes due today. Thanks as always for
 4 your cooperation. Tansy." And then you've
 5 copied it to Minister Wiseman and to Mr.
 6 Abbott and others in the department. So I
 7 take it the ER/PR status, it's in the longer
 8 list of departmental House of Assembly notes
 9 for the minister, but it doesn't make the top
 10 issue notes?
 11 MS. MUNDON:
 12 A. Correct.
 13 CHAYTOR, Q.C.:
 14 Q. Okay. And this is as of March 5th, 2007?
 15 MS. MUNDON:
 16 A. Correct.
 17 CHAYTOR, Q.C.:
 18 Q. After the issue--when did the house -
 19 MS. MUNDON:
 20 A. I'd just like to make a note here, as well,
 21 you'll notice that I say "If you require me to
 22 write questions for the briefing notes, please
 23 advise ASAP." because the drafting of
 24 questions and key messages wasn't a natural
 25 role for me in the position, it was one that

Page 119

1 evolved over time. So I didn't--like, it
 2 wasn't my role to write questions and key
 3 messages for all of the briefing notes, and in
 4 fact, I did not do that for all of the
 5 briefing notes.
 6 CHAYTOR, Q.C.:
 7 Q. Okay. And do you recall when the house
 8 opened?
 9 MS. MUNDON:
 10 A. I can't recall the exact date. I'd have to
 11 look that up.
 12 CHAYTOR, Q.C.:
 13 Q. Okay. And is this the first time the house
 14 would have opened for 2007?
 15 MS. MUNDON:
 16 A. Yes.
 17 CHAYTOR, Q.C.:
 18 Q. Okay. So in terms of the ER/PR issue having,
 19 as of December 12th in your mind, made the
 20 list of top issues that day for the house, by
 21 March 9th, 2007 it's not of that status for -
 22 MS. MUNDON:
 23 A. As I indicated before, the top issues would be
 24 assessed in consultation with the deputy
 25 minister.

Page 120

1 CHAYTOR, Q.C.:
 2 Q. Yes.
 3 MS. MUNDON:
 4 A. And the deputy minister, you know, and in some
 5 cases the minister, so these would be the
 6 issues that they would have assessed to be the
 7 top five issues at that time.
 8 CHAYTOR, Q.C.:
 9 Q. Okay. And do you know why ER/PR was not
 10 deemed to be a top issue at this time?
 11 MS. MUNDON:
 12 A. Likely because it wasn't in the media at the
 13 time and the likelihood of the minister
 14 getting questioned probably wasn't as high as
 15 these other issues were.
 16 CHAYTOR, Q.C.:
 17 Q. Okay.
 18 COMMISSIONER:
 19 Q. Would you like to take the morning break,
 20 then?
 21 CHAYTOR, Q.C.:
 22 Q. Thank you.
 23 COMMISSIONER:
 24 Q. Okay, then, we'll take 15 minutes.
 25 (RECESS)

Page 121

1 COMMISSIONER:
 2 Q. Please be seated. Ms. Chaytor.
 3 CHAYTOR, Q.C.:
 4 Q. Thank you, Commissioner. Ms. Mundon, if we
 5 could have, please, P-0203? Ms. Mundon, this
 6 is an e-mail exchange between yourself and
 7 Minister--or yourself, sorry, to Mr. Abbott
 8 and Minister Wiseman and Ms. Hennessey and
 9 it's March 15th at 10:35 p.m. and the update,
 10 subject is "Update ER/PR. FYI Susan Bonnell
 11 told me this afternoon that Eastern Health
 12 received a submission under Access to
 13 Information from the media requesting
 14 patient," and it says, "conversation rates
 15 associated with ER/PR. Apparently Susan was
 16 only informed about the request today, but the
 17 request has to be completed by early next
 18 week. It appears the media will receive
 19 limited information. Once Susan receives
 20 further details expected tomorrow she will
 21 advise me accordingly." Now, obviously this
 22 is about an ATIPPA request that's been--that
 23 Eastern Health has received around the ER/PR
 24 issue. Do you recall your discussions with
 25 Ms. Bonnell on this issue?

Page 122

1 MS. MUNDON:
 2 A. No, I don't recall the exact conversation, but
 3 I would assume that she would have just, given
 4 that she just found out about the issue, that
 5 this would basically include all that she
 6 would have told me, that there was a request
 7 received under there, looking for the
 8 conversion rates.
 9 CHAYTOR, Q.C.:
 10 Q. And the issue that, or the idea that the media
 11 will receive limited information, what was
 12 that about?
 13 MS. MUNDON:
 14 A. I think she had mentioned something about the
 15 fact that because they were looking for
 16 information, specific information related to
 17 patients, that the media would receive limited
 18 information in that regard.
 19 CHAYTOR, Q.C.:
 20 Q. Okay. So limited in terms of obviously not
 21 patient identification information?
 22 MS. MUNDON:
 23 A. Yes.
 24 CHAYTOR, Q.C.:
 25 Q. So you understood it to be limited in not

Page 123

1 providing, well, actual patient names -
 2 MS. MUNDON:
 3 A. Yes.
 4 CHAYTOR, Q.C.:
 5 Q. - or anything that would identify the
 6 patients?
 7 MS. MUNDON:
 8 A. Yes.
 9 CHAYTOR, Q.C.:
 10 Q. Do you recall anything else about your
 11 discussion with Ms. Bonnell around this issue?
 12 MS. MUNDON:
 13 A. No, I don't.
 14 CHAYTOR, Q.C.:
 15 Q. You indicate here that once she receives
 16 further detail she was going to advise you.
 17 Did Ms. Bonnell get back to you?
 18 MS. MUNDON:
 19 A. I think I followed up with her, but I don't
 20 think she had any further information other
 21 than what she had the previous day.
 22 CHAYTOR, Q.C.:
 23 Q. Why, now it's been three months, I guess, or,
 24 yes, three months that it's been quiet in the
 25 department, you've told us, on this issue, why

Page 124

1 is Ms. Bonnell informing you of this at all?
 2 MS. MUNDON:
 3 A. I guess because it was a submission under
 4 Access to Information from the media and the
 5 fact that whatever information is released to
 6 the media will become public information.
 7 CHAYTOR, Q.C.:
 8 Q. And why then do you notify the senior
 9 executive in the--or the senior members within
 10 the department?
 11 MS. MUNDON:
 12 A. I would just be following due process just to
 13 let them know about a conversation that I had
 14 with Ms. Bonnell and to just relay that
 15 information on to them.
 16 CHAYTOR, Q.C.:
 17 Q. Did Ms. Bonnell indicate to you during any of
 18 your discussions around this issue that Mr.
 19 Quinn would be given information as to how to
 20 find the affidavit or how to access the
 21 affidavit that had been filed in court around
 22 the class action?
 23 MS. MUNDON:
 24 A. No, she did not.
 25 CHAYTOR, Q.C.:

Page 125

1 Q. Was there any discussion at all about the
 2 existence of the affidavit during your
 3 discussions with Ms. Bonnell?
 4 MS. MUNDON:
 5 A. No, not that I recall.
 6 CHAYTOR, Q.C.:
 7 Q. Were you aware that an affidavit had been
 8 filed?
 9 MS. MUNDON:
 10 A. I was aware because it was referenced in a
 11 briefing note at some point, but I had never
 12 seen it or knew any of the details around the
 13 affidavit.
 14 CHAYTOR, Q.C.:
 15 Q. And I take it you never requested any
 16 information on it or a copy of the affidavit?
 17 MS. MUNDON:
 18 A. Not myself, no.
 19 CHAYTOR, Q.C.:
 20 Q. Anyone in the department?
 21 MS. MUNDON:
 22 A. Not that I'm aware of.
 23 CHAYTOR, Q.C.:
 24 Q. And Mr. Wiseman responds back to you within
 25 just a couple of minutes that evening and asks

Page 126

1 you what is conversation rate. Now, up to
 2 this point in time, March 15th, 2007, other
 3 than the briefing note which was provided on
 4 March 5th, 2007, I believe, or thereabouts,
 5 that we looked at before we took the break,
 6 other than that had you had any discussions
 7 with Mr. Wiseman around this ER/PR issue?
 8 MS. MUNDON:
 9 A. Not that I can recall.
 10 CHAYTOR, Q.C.:
 11 Q. And other than the briefing note, do you know
 12 whether or not Mr. Wiseman would have had any
 13 information on the issue?
 14 MS. MUNDON:
 15 A. I'm not sure what he would have had in his
 16 possession on the issue.
 17 CHAYTOR, Q.C.:
 18 Q. And Mr. Wiseman's question to you, "What is
 19 conversation rate?" did that alert you to the
 20 fact that he appeared to have limited
 21 knowledge and was less than conversant,
 22 really, on the issue?
 23 MS. MUNDON:
 24 A. I didn't know at that point if because I had a
 25 typo there calling it conversation rate as

Page 127

1 opposed to conversion rate, if he knew, if he
 2 was asking what is a conversation rate.
 3 CHAYTOR, Q.C.:
 4 Q. Yes.
 5 MS. MUNDON:
 6 A. But I believe that I did follow up with Ms.
 7 Hennessey and Mr. Abbott on this e-mail.
 8 CHAYTOR, Q.C.:
 9 Q. Yes, and what happened then in follow up?
 10 MS. MUNDON:
 11 A. Well I just would have asked them to provide
 12 for the Minister some information on, you
 13 know, what a conversion rate is.
 14 CHAYTOR, Q.C.:
 15 Q. Okay, and it appears anyhow that Minister
 16 Wiseman is not--he's not realizing that's a
 17 typographical error on your part and he's
 18 wondering what's the conversion rate?
 19 MS. MUNDON:
 20 A. Yes.
 21 CHAYTOR, Q.C.:
 22 Q. So you pointed this out to Ms. Hennessey and
 23 Mr. Abbott?
 24 MS. MUNDON:
 25 A. Yes, I believe.

Page 128

1 CHAYTOR, Q.C.:
 2 Q. And asked--and told him that the Minister is
 3 inquiring about the conversion rate?
 4 MS. MUNDON:
 5 A. Yes.
 6 CHAYTOR, Q.C.:
 7 Q. And what was their response to that?
 8 MS. MUNDON:
 9 A. I don't recall specifically what their
 10 response is or if the deputy had followed up
 11 with the Minister to give him a verbal
 12 briefing, I'm not sure.
 13 CHAYTOR, Q.C.:
 14 Q. And again, if the Minister is asking for the
 15 conversion rate, if that in fact is ultimately
 16 where the conversation led to, what is the
 17 conversion rate, then those numbers or numbers
 18 certainly as of November 23rd were within the
 19 department. Do you know whether or not that
 20 was pointed out to Minister Wiseman and he was
 21 provided with those numbers or anybody tried
 22 to do a calculation for him to be able to
 23 determine the conversion rate?
 24 MS. MUNDON:
 25 A. I'm not aware if he would have received that

Page 129

1 information, but I certainly know at this
 2 point in time I wouldn't have been aware of
 3 what the conversion rate was myself.
 4 CHAYTOR, Q.C.:
 5 Q. And I'm wondering if though--did you have any
 6 discussion then yourself with Minister Wiseman
 7 around this issue?
 8 MS. MUNDON:
 9 A. I can't recall if I did or not.
 10 CHAYTOR, Q.C.:
 11 Q. So whether or not the November 23rd memo or
 12 briefing note is brought to his attention, you
 13 don't know?
 14 MS. MUNDON:
 15 A. I don't know if it is or not.
 16 CHAYTOR, Q.C.:
 17 Q. And did you take part then over the course of
 18 the next few days in any discussion with the
 19 Minister around the issue of a conversion
 20 rate?
 21 MS. MUNDON:
 22 A. I can't recall.
 23 CHAYTOR, Q.C.:
 24 Q. If we could look at, please, P-0125? Actually
 25 I think it's P-0126.

Page 130

1 THE COMMISSIONER:
 2 Q. I just want to make sure I understood the last
 3 point you made. As I understand it, you were
 4 concerned when you got the response from the
 5 Minister that perhaps he didn't understand
 6 what conversion rates were?
 7 MS. MUNDON:
 8 A. No, I thought that he may have thought that I
 9 was talking about the conversation rate, that
 10 he may not have known what a conversation rate
 11 was because of the fact that I had made a typo
 12 in the e-mail.
 13 THE COMMISSIONER:
 14 Q. But you did follow up with Mr. Abbott and Ms.
 15 Hennessey to ensure that the Minister was
 16 conversant with conversion rate -
 17 MS. MUNDON:
 18 A. Yes.
 19 THE COMMISSIONER:
 20 Q. Is that what you -
 21 MS. MUNDON:
 22 A. I believe so, yes.
 23 THE COMMISSIONER:
 24 Q. But you don't remember whether or not you
 25 spoke to him about conversion rates?

Page 131

1 MS. MUNDON:
 2 A. I don't recall whether I spoke to him or not,
 3 but I do know, Madam Commissioner, that I
 4 wasn't aware at that point in time what the
 5 conversion rate was myself.
 6 THE COMMISSIONER:
 7 Q. No, I understood you to say that, but I was
 8 further understanding you were saying that you
 9 couldn't recall whether or not you even had a
 10 discussion with him about what a conversion
 11 rate would be?
 12 MS. MUNDON:
 13 A. I think I would have replied to his e-mail to
 14 say that it would be a conversion rate or I
 15 would have told him personally it would be a
 16 conversion rate, not it was a typo on my part,
 17 but I don't recall if I had follow up
 18 discussion with him on that.
 19 THE COMMISSIONER:
 20 Q. But you do recall that you asked either Mr.
 21 Abbott or Ms. Hennessey to follow up with him?
 22 MS. MUNDON:
 23 A. Yes.
 24 CHAYTOR, Q.C.:
 25 Q. P-0126 at page 8 and this is page 9, actually,

Page 132

1 is the briefing note, question and answer
 2 briefing note dated April 19th, 2007 and you
 3 will see the last bullet in the briefing note
 4 refers to "Eastern Health filed an affidavit
 5 in court on December 15th, 2006" and it goes
 6 on from there. And we believe that day may
 7 not necessarily be right, but it does
 8 reference an affidavit having been filed. Ms.
 9 Mundon, would you be involved in drafting the
 10 anticipated questions and key messages in this
 11 briefing note?
 12 MS. MUNDON:
 13 A. I think I would have been, yes.
 14 CHAYTOR, Q.C.:
 15 Q. And under the key messages, the last bullet
 16 refers to "There were multiple factors
 17 involved in ER/PR testing. There has been no
 18 blame assigned within Eastern Health. Since
 19 legal proceedings have been initiated,
 20 government will have to allow the legal
 21 process to determine if in fact error has
 22 occurred."
 23 MS. MUNDON:
 24 A. That would be consistent with the previous
 25 draft of the e-mail.

Page 133

1 CHAYTOR, Q.C.:

2 Q. Yes, okay. And my question to you is did the

3 Minister raise any issue with you around that

4 key message?

5 MS. MUNDON:

6 A. He didn't raise any concern with me. I'm not

7 sure if he raised any concern with anybody

8 else within the department.

9 CHAYTOR, Q.C.:

10 Q. So was it ever pointed out to you that any

11 issue in terms of holding that out as a key

12 message?

13 MS. MUNDON:

14 A. No, nothing was ever highlighted to me as a

15 concern.

16 THE COMMISSIONER:

17 Q. Can you tell me why it is that you believe

18 that you were a party to this particular

19 document?

20 MS. MUNDON:

21 A. Just because of the last question there, Madam

22 Commissioner, I think I recall adding that

23 question, "Are pathologists or laboratory

24 staff to blame for incorrect ER/PR test

25 results?"

Page 134

1 CHAYTOR, Q.C.:

2 Q. Okay, and what do you recall then around that?

3 Why did you add that as a question?

4 MS. MUNDON:

5 A. I'm not sure if this was the time in the media

6 when there was discussion around a pathology

7 shortage and that that would have caused me to

8 add that question.

9 CHAYTOR, Q.C.:

10 Q. And where did you get the information to be

11 able to answer that question?

12 MS. MUNDON:

13 A. I would have written the answer in

14 consultation with Ms. Hennessey.

15 CHAYTOR, Q.C.:

16 Q. So Ms. Hennessey would give you information.

17 Did you consult Ms. Bonnell and ask her any

18 questions around that?

19 MS. MUNDON:

20 A. No, again just to clarify with respect to

21 writing the key messages, my role in writing

22 the key messages would not be a researching

23 role to seek out information, the briefing

24 note would have already been written by

25 departmental staff and I would simply be

Page 135

1 relying on information that are already

2 contained in the briefing note or provided to

3 me by departmental staff.

4 THE COMMISSIONER:

5 Q. So why are you involved again in preparing

6 these even?

7 MS. MUNDON:

8 A. In terms of the anticipated questions, and as

9 I point out earlier in that e-mail, I didn't--

10 I wasn't involved with all divisions of the

11 department with writing anticipated questions,

12 but in some instances, what happened is that

13 briefing notes were coming forward, Madam

14 Commissioner, where the questions that staff

15 would come up with would include what is this

16 program or, you know, something that would

17 never be asked by the media or the public. So

18 some staff were struggling with relevant

19 questions that could be asked by the media or

20 by the opposition in the House of Assembly, so

21 I was--I got involved in terms of that role to

22 be able to put some perspective on the types

23 of questions that people in the public or the

24 media or the opposition would likely ask.

25 THE COMMISSIONER:

Page 136

1 Q. Okay, and you indicated that you did have a

2 role in, as well in key messages, so why are

3 you involved with that?

4 MS. MUNDON:

5 A. I'm just involved with key messages from the

6 perspective of if the Minister had an

7 opportunity to make some statements on this

8 issue, what would he want to say? And again,

9 it's based on information that's already

10 contained in the briefing note or provided to

11 me by the Assistant Deputy Minister or the

12 Deputy Minister.

13 THE COMMISSIONER:

14 Q. And the ADM and the DM could be expected to

15 look at that as well, could they not?

16 MS. MUNDON:

17 A. Yes, they review--the ADM and the Deputy

18 Minister review and approve anything that I

19 put in a briefing note.

20 THE COMMISSIONER:

21 Q. That's my understanding, thank you.

22 MS. MUNDON:

23 A. Yes.

24 CHAYTOR, Q.C.:

25 Q. And it was your thinking that perhaps there is

Page 137

1 something in the media around pathologist
 2 shortage at this--around this point in time,
 3 in the spring of 2007?
 4 MS. MUNDON:
 5 A. I think there may have been, yes.
 6 CHAYTOR, Q.C.:
 7 Q. If we could look at P-1414 please? Could it
 8 be perhaps there was discussion with the
 9 department around that issue at that point in
 10 time, as opposed to discussion within the
 11 media?
 12 MS. MUNDON:
 13 A. I don't think so because I wouldn't have added
 14 it as a potential question, I don't think, if
 15 it wasn't a possibility that the media would
 16 ask that question.
 17 CHAYTOR, Q.C.:
 18 Q. So your questions aren't necessarily what are
 19 issues within the department or issues of
 20 discussion within the department, it's more
 21 what would the media likely ask?
 22 MS. MUNDON:
 23 A. Yes, and the public.
 24 CHAYTOR, Q.C.:
 25 Q. Because we have this letter here, P-1414, it's

Page 138

1 a letter from, I believe it's Dr. Denic on
 2 March 21st, 2007 and he copies it to Minister
 3 Wiseman and it's written to Mr. Abbott. And
 4 it's regarding possible loss of a breast
 5 pathologist specialist. And he writes in the
 6 second paragraph, "I cannot stress enough that
 7 after all the fiasco with ER/PR testing and
 8 interpretation, the loss of this pathologist
 9 will greatly jeopardize the future of breast
 10 pathology practice in our province." And it
 11 goes on from there. So do you recall this
 12 being discussed within the department as an
 13 issue at the time?
 14 MS. MUNDON:
 15 A. I certainly don't recall reading this letter.
 16 I'm not sure if it was discussed, it may have
 17 been discussed as an issue, but I'm normally
 18 not involved with discussions on issues unless
 19 there's a potential, I guess, that it could be
 20 a media issue.
 21 CHAYTOR, Q.C.:
 22 Q. Okay, so from your perspective then, Ms.
 23 Mundon, what happens next with respect to the
 24 ER/PR issue?
 25 MS. MUNDON:

Page 139

1 A. If I can recall correctly, I think the next
 2 timeline is when the story broke in May, 2007,
 3 by CBC.
 4 CHAYTOR, Q.C.:
 5 Q. Okay, and what do you recall about CBC's
 6 story?
 7 MS. MUNDON:
 8 A. Well I think it was May 15th, I was actually
 9 off sick that day that the story broke, but I
 10 would have been in the office the following
 11 day and learned about it then. I remember
 12 being very surprised about the fact that
 13 Eastern Health had not disclosed all the
 14 information in December and it was the first
 15 time that I had heard of 42 percent as being a
 16 rate of error associated with this, and it was
 17 the first time that I had seen anyone putting
 18 those numbers together to get that conversion
 19 rate.
 20 CHAYTOR, Q.C.:
 21 Q. And so you're not actually in the office on
 22 May 15th, but the next day you came back.
 23 MS. MUNDON:
 24 A. Yes.
 25 CHAYTOR, Q.C.:

Page 140

1 Q. And what was being discussed within the
 2 office?
 3 MS. MUNDON:
 4 A. Just the fact that Eastern Health had gone out
 5 and had not disclosed this information, that
 6 it was in a court affidavit that none of us
 7 had a copy of and just wondered why Eastern
 8 Health would withhold information from the
 9 public when they told the Minister or the
 10 Minister certainly had the understanding in
 11 that briefing in November that all the
 12 information would be disclosed and what would
 13 be the point of not disclosing information
 14 that was inevitably going to come out in a
 15 court affidavit in the public domain.
 16 CHAYTOR, Q.C.:
 17 Q. Okay. And did you--who was saying those
 18 things within the department?
 19 MS. MUNDON:
 20 A. I would have been talking to Mr. Hynes, I
 21 think, the minister, Mr. Abbott, Ms.
 22 Hennessey, I think we would have all had some
 23 discussion around that.
 24 CHAYTOR, Q.C.:
 25 Q. And so everybody seemed to be equally

Page 141

1 surprised?
 2 MS. MUNDON:
 3 A. Yes.
 4 CHAYTOR, Q.C.:
 5 Q. Okay. And equally concerned that information
 6 hadn't come out in the December, 2006?
 7 MS. MUNDON:
 8 A. Yes.
 9 CHAYTOR, Q.C.:
 10 Q. Okay. And did anyone point out to the
 11 minister that we had their briefing materials
 12 beforehand?
 13 MS. MUNDON:
 14 A. I'm not sure if anybody did, but I would think
 15 that he would have been told that at that time
 16 and would have been provided a copy of it, of
 17 the package.
 18 CHAYTOR, Q.C.:
 19 Q. Do you recall any discussion around that?
 20 MS. MUNDON:
 21 A. No, I don't.
 22 CHAYTOR, Q.C.:
 23 Q. And did you--were you asked any questions
 24 about, well, what happened in the media in the
 25 aftermath or did you follow the story in the

Page 142

1 aftermath of the technical briefing?
 2 MS. MUNDON:
 3 A. No, I was not asked any questions around that.
 4 CHAYTOR, Q.C.:
 5 Q. So nobody asked you about that or what the
 6 fallout in the media was following the
 7 technical briefing?
 8 MS. MUNDON:
 9 A. No, well, the staff within the department
 10 would have had copies of the same articles
 11 that I would have had copies of.
 12 CHAYTOR, Q.C.:
 13 Q. Yes. But then at four or five months down the
 14 road when it becomes an issue again, as
 15 communications director if people were asking
 16 questions around that, do you think they might
 17 look to you to find out the answer for them?
 18 MS. MUNDON:
 19 A. They may have, and I certainly recall them
 20 putting a call in to Ms. Bonnell to ask what
 21 happened here.
 22 CHAYTOR, Q.C.:
 23 Q. Okay. And what did--tell us about that
 24 discussion then, what happened, what did you
 25 and Ms. Bonnell discuss?

Page 143

1 MS. MUNDON:
 2 A. Well, I think I would have asked her at the
 3 time why the information wasn't disclosed, why
 4 it wasn't communicated to me that it wouldn't
 5 be disclosed or anybody in the department, for
 6 that matter, when our clear understanding was
 7 that it would be disclosed. And I recall that
 8 she had followed up with me with an e-mail in
 9 which she points out that in the media that
 10 almost all of the reporters reference that
 11 they would not be providing the information.
 12 So it's clear from that e-mail that she's
 13 telling me that, well, the media had reported
 14 it. In other words, she didn't give me the
 15 heads up, the media--that I would have had to
 16 pick it up, basically, from the media or in
 17 the background of that material, which would
 18 be buried, I perceived to be buried in the Q
 19 and As.
 20 CHAYTOR, Q.C.:
 21 Q. Okay. So when you phoned Ms. Bonnell to ask
 22 her why the information didn't come out in
 23 December, what was her response to you on--to
 24 that question, why didn't it come out in
 25 December?

Page 144

1 MS. MUNDON:
 2 A. I don't recall receiving an appropriate
 3 response to that question other than what I
 4 now know as, you know, it was already in the
 5 media and that is in terms of litigation
 6 concerned. And I asked her the question of
 7 why would Eastern Health use that as a
 8 rationale for not disclosing information
 9 knowing the fact that the court affidavit was
 10 going to become public in any event, what
 11 would be the purpose of not disclosing
 12 information that the public would ultimately
 13 have access to. All you do there is destroy
 14 confidence.
 15 CHAYTOR, Q.C.:
 16 Q. And what was her response to that?
 17 MS. MUNDON:
 18 A. Just that they made the judgment call at that
 19 time.
 20 CHAYTOR, Q.C.:
 21 Q. In your discussion with Ms. Bonnell and asking
 22 her why all the information hadn't been
 23 released in December, 2006, did she tell you
 24 that they did it on reliance on the advice of
 25 their lawyer?

Page 145

1 MS. MUNDON:
 2 A. Yes.
 3 CHAYTOR, Q.C.:
 4 Q. And in Ms. Bonnell's response back to you by
 5 e-mail in telling you what the media had
 6 covered at the time, what did you understand
 7 Ms. Bonnell to be telling you?
 8 MS. MUNDON:
 9 A. I understood her to be saying that I should
 10 have picked it up in the media.
 11 CHAYTOR, Q.C.:
 12 Q. Did you have any other discussions with Ms.
 13 Bonnell around that issue?
 14 MS. MUNDON:
 15 A. No, I don't recall having any other
 16 discussions.
 17 CHAYTOR, Q.C.:
 18 Q. Did Ms. Bonnell--did you have any warning that
 19 this story was going to break, did you have
 20 any warning that Mr. Quinn was going to be
 21 coming out with this story?
 22 MS. MUNDON:
 23 A. Yes, I believe I--no, I didn't. I found out--
 24 the story broke, if I can remember correctly,
 25 it was on a Tuesday. I'm just trying to

Page 146

1 remember the dates now. Ms. Bonnell was off
 2 sick on Monday and when I called her to ask
 3 her why I didn't receive heads up on the
 4 story, she indicated she was off sick on the
 5 Monday and that Mr. Quinn had contacted her
 6 the week prior to. So she had been dealing
 7 with him the week previous but she didn't give
 8 me a heads up to that fact or to the fact that
 9 the story would be breaking.
 10 CHAYTOR, Q.C.:
 11 Q. So the fact that Eastern Health had been
 12 receiving media inquiries for a few days
 13 before May 15th, was that told to you before
 14 May 15th?
 15 MS. MUNDON:
 16 A. No, it was not.
 17 CHAYTOR, Q.C.:
 18 Q. Okay. And did you ask of Ms. Bonnell, well,
 19 why didn't you let us know that they were
 20 asking questions again?
 21 MS. MUNDON:
 22 A. Yes, I did.
 23 CHAYTOR, Q.C.:
 24 Q. And what was her response?
 25 MS. MUNDON:

Page 147

1 A. I don't recall a satisfactory response other
 2 than, you know, it was simply overlooked.
 3 CHAYTOR, Q.C.:
 4 Q. And were you perturbed by that?
 5 MS. MUNDON:
 6 A. Yes, I was.
 7 CHAYTOR, Q.C.:
 8 Q. Okay. And what did you tell Ms. Bonnell -
 9 MS. MUNDON:
 10 A. I was very perturbed by this point because at
 11 this point in time, you have to remember, this
 12 is the first time that I'm finding out that
 13 the information hasn't been disclosed that we
 14 believed would be disclosed on November 23rd.
 15 So finding out for the first time that
 16 information had not been disclosed, that that
 17 information was withheld from the public, that
 18 the information was in a court affidavit that
 19 the department did not have access to or know
 20 about, that, you know, was going to contain
 21 this information, and now the story breaks and
 22 I have absolutely no knowledge of the story in
 23 advance even though she was aware days prior
 24 to that.
 25 CHAYTOR, Q.C.:

Page 148

1 Q. Okay. And I take it you told Ms. Bonnell how
 2 you felt about it?
 3 MS. MUNDON:
 4 A. Yes, I did.
 5 CHAYTOR, Q.C.:
 6 Q. And did you tell others in the department how
 7 you felt about it?
 8 MS. MUNDON:
 9 A. Yes, I did.
 10 CHAYTOR, Q.C.:
 11 Q. Did you agree with Ms. Bonnell that you should
 12 have picked it up in the media back in
 13 December, 2006?
 14 MS. MUNDON:
 15 A. I don't think I should have had to pick it up
 16 in the media in 2006. I think that I should
 17 have been given a heads up to that effect,
 18 given the fact that we had a briefing in
 19 November, November 23rd, 2006 with the
 20 minister and Eastern Health officials, that we
 21 all left the meeting with the same assumption,
 22 that that information would be disclosed by
 23 Eastern Health, there was no further
 24 conversation with Ms. Bonnell to tell me that
 25 that would not be the case, in the media

Page 149

1 materials that were sent that day, I was given
 2 no heads up that they wouldn't be disclosing
 3 information, the fact that it wouldn't be
 4 disclosed was buried, I believe, in a Q and A
 5 document, so I don't think that I should have
 6 had to find out about it through media
 7 coverage. I believe that I should have been
 8 given a heads up on that issue.
 9 CHAYTOR, Q.C.:
 10 Q. And when you say buried in the Q and A
 11 document, the question 9 that I have taken you
 12 to, that's where it is?
 13 MS. MUNDON:
 14 A. Yes.
 15 CHAYTOR, Q.C.:
 16 Q. Yes. And looking back on it now, Ms. Mundon,
 17 apart from, yes, it wasn't red flagged for you
 18 and whether or not they should have done that,
 19 but in terms of yourself, then, not picking it
 20 up in the media, do you believe in hindsight
 21 that you should have?
 22 MS. MUNDON:
 23 A. In hindsight obviously I wouldn't have had the
 24 same level of trust that they were going to do
 25 what they said they were going to do and I

Page 150

1 certainly would have monitored it more
 2 closely. But again, I was following an issue
 3 that was being managed from an operational
 4 perspective by Eastern Health and I trusted
 5 that they were going to do what they--what we
 6 all assumed they were going to do in that
 7 briefing with the minister, which was to
 8 disclose all the information.
 9 CHAYTOR, Q.C.:
 10 Q. And during your discussions then on May 16th
 11 with Ms. Bonnell, what did you understand
 12 Eastern Health's communications plan was at
 13 that point in time, what were they now going
 14 to do now that the story had broken?
 15 MS. MUNDON:
 16 A. I think it was my understanding at the time
 17 that they were going to refrain from
 18 commenting in the public.
 19 CHAYTOR, Q.C.:
 20 Q. Okay. And she told you this?
 21 MS. MUNDON:
 22 A. I believe so, yes.
 23 CHAYTOR, Q.C.:
 24 Q. So they were going to continue the no comment?
 25 MS. MUNDON:

Page 151

1 A. Yes.
 2 CHAYTOR, Q.C.:
 3 Q. And why?
 4 MS. MUNDON:
 5 A. I have no idea why they would do that.
 6 CHAYTOR, Q.C.:
 7 Q. Did you have concerns about that?
 8 MS. MUNDON:
 9 A. Yes, I did.
 10 CHAYTOR, Q.C.:
 11 Q. Okay. And who did you tell--did you tell
 12 those concerns to anyone?
 13 MS. MUNDON:
 14 A. I think I would have talked to the deputy
 15 minister at that point.
 16 CHAYTOR, Q.C.:
 17 Q. Okay. And as a communications expert what--
 18 why did you not think that was a good course
 19 of action?
 20 MS. MUNDON:
 21 A. Because they were now in a position--all
 22 throughout dealing with this file from a
 23 communications perspective they were in a
 24 reactive mode, but now they were in a
 25 situation where they had had a briefing in

Page 152

1 2006 to notify the public and the media of
 2 where they were with the issue. The purpose
 3 of having a briefing like that is to gain
 4 respect from the media and from the public and
 5 to provide the most up-to-date information on
 6 the issue. Given the fact that they had
 7 intentionally withheld that information and
 8 mislead the public, then later on to only find
 9 out that that information was going to be
 10 disclosed anyway in the court affidavit, they
 11 were now in the position where they owed but
 12 the public and the media an apology, I felt,
 13 and they had to try to get out there and
 14 regain credibility within the public.
 15 CHAYTOR, Q.C.:
 16 Q. And did you express those views to others
 17 within the department?
 18 MS. MUNDON:
 19 A. I believe I did with the deputy minister, yes.
 20 CHAYTOR, Q.C.:
 21 Q. And what was Mr. Abbott's response?
 22 MS. MUNDON:
 23 A. I can't recall what his specific comments or
 24 what any of his comments would have been.
 25 CHAYTOR, Q.C.:

Page 153

1 Q. Did he share your concerns or share your view
 2 on the issue?
 3 MS. MUNDON:
 4 A. Yes, I believe he did share the same concern
 5 that they hadn't gone out with all the
 6 numbers.
 7 CHAYTOR, Q.C.:
 8 Q. Okay. And those are fairly strong words. Did
 9 Mr. Abbott share that sentiment?
 10 MS. MUNDON:
 11 A. That he--which comments are you referring to?
 12 CHAYTOR, Q.C.:
 13 Q. The idea that somehow there had been an
 14 intentional withholding of information by
 15 Eastern Health, for example?
 16 MS. MUNDON:
 17 A. No, he didn't express that.
 18 CHAYTOR, Q.C.:
 19 Q. He didn't express that?
 20 MS. MUNDON:
 21 A. No.
 22 CHAYTOR, Q.C.:
 23 Q. Okay. And looking at it now, Ms. Mundon, and
 24 Eastern Health certainly appears that they
 25 told the media up front that certain

Page 154

1 information would not be coming out. It's not
 2 like they--you know, they did express that,
 3 they did say that certain information can't,
 4 for whatever reasons, or right now we're not
 5 prepared to release. So they did say that up
 6 front to the media?
 7 MS. MUNDON:
 8 A. However, they said because of pending
 9 litigation when in May of the following year
 10 the information was made available by the
 11 media. So what would be the point of using
 12 the rationale of a pending litigation when
 13 you're only at a point where the affidavit is
 14 being filed where the information is being
 15 disclosed, in any event? Why not be
 16 forthcoming with the media and provide them
 17 with that information?
 18 CHAYTOR, Q.C.:
 19 Q. Okay. And, Ms. Mundon, did you--I take it
 20 your personal trust was shaken at this point
 21 in time in Eastern Health?
 22 MS. MUNDON:
 23 A. Yes, it was.
 24 CHAYTOR, Q.C.:
 25 Q. And was that shared with others in the

Page 155

1 department, did others share that loss of
 2 trust?
 3 MS. MUNDON:
 4 A. I would say at that point in time that there
 5 was certainly scepticism among people.
 6 CHAYTOR, Q.C.:
 7 Q. Okay. And who did you get that sense from?
 8 MS. MUNDON:
 9 A. I would have got that sense from the relevant
 10 people dealing with the file, you know, Ms.
 11 Hennessey, Mr. Abbott.
 12 CHAYTOR, Q.C.:
 13 Q. And what about the minister?
 14 MS. MUNDON:
 15 A. The minister, I think, would have been a bit
 16 sceptical, as well, as to why they wouldn't
 17 have disclosed information.
 18 CHAYTOR, Q.C.:
 19 Q. Okay. And we know there was meeting on May
 20 15th with Eastern Health. I take it you're
 21 off sick, so you did not attend that meeting?
 22 MS. MUNDON:
 23 A. No, I did not.
 24 CHAYTOR, Q.C.:
 25 Q. Okay. Did anyone discuss with you when you

Page 156

1 came back on May 16th how that meeting went,
 2 what was discussed in the meeting?
 3 MS. MUNDON:
 4 A. I don't recall getting an overview of that
 5 meeting, no.
 6 CHAYTOR, Q.C.:
 7 Q. Were you aware the meeting even took place?
 8 MS. MUNDON:
 9 A. No, I was not.
 10 CHAYTOR, Q.C.:
 11 Q. If we could look, please, at 0825? And I
 12 believe this is the e-mail, Ms. Mundon, that
 13 Ms. Bonnell sent to you. It's in the afternoon
 14 of May 16th, 2007, and she writes "around the
 15 time of the media briefing note that almost
 16 all the reporters referenced the fact that we
 17 will not reveal how many women had a false
 18 report. Only about 117 had treatment changes.
 19 In the briefing, this obviously came up. We
 20 were asked by Mark Quinn and others if there
 21 were more than 117 women whose test results
 22 changed and we did tell them yes, but that the
 23 number was not relevant or available to
 24 provide due to pending litigation. Here's the
 25 prepared Q and A on this issue, which as I

Page 157

1 recall we stuck to like glue," and then she's
 2 cut and pasted the question nine and the
 3 answer into the e-mail to you, and then
 4 included are copies of media coverage at the
 5 time. So this is what Ms. Bonnell sent to you
 6 at the time?
 7 MS. MUNDON:
 8 A. Yes.
 9 CHAYTOR, Q.C.:
 10 Q. Sorry, what happened to our exhibit,
 11 Registrar? Thank you. If we could also have,
 12 please, 0826? And did you forward Ms.
 13 Bonnell's e-mail on to anyone else in the
 14 Department?
 15 MS. MUNDON:
 16 A. I can't recall if I did or not.
 17 CHAYTOR, Q.C.:
 18 Q. I'll just take you to the--this is another e-
 19 mail then very shortly after from Ms. Bonnell.
 20 I think it's actually a minute later. She
 21 also says "I know I sent this to you already,
 22 but just in case," and she's included her
 23 prior e-mail to you of December 11th 2006, and
 24 then you'll see it's the materials of December
 25 11th 2006.

Page 158

1 MS. MUNDON:
 2 A. Yes.
 3 CHAYTOR, Q.C.:
 4 Q. So why is she re-sending the materials to you
 5 on May 16th? Did you ask to be provided with
 6 the material?
 7 MS. MUNDON:
 8 A. No, I think she's just making the point that
 9 she had sent me the package of materials on
 10 that morning.
 11 CHAYTOR, Q.C.:
 12 Q. And if we could look at, please, Registrar,
 13 0189? And two minutes later, she sends you
 14 another e-mail, and I take it you didn't
 15 respond to any of these e-mails?
 16 MS. MUNDON:
 17 A. No.
 18 CHAYTOR, Q.C.:
 19 Q. Okay. So you saw this as Ms. Bonnell telling
 20 you, again, "well, you should have known"?
 21 MS. MUNDON:
 22 A. Yes.
 23 CHAYTOR, Q.C.:
 24 Q. Okay, and Ms. Bonnell sending to you, two
 25 minutes later, "this might help as well....re:

Page 159

1 the dead" and she's sending to you an e-mail
 2 which was from Mr. Tilley, December 10th 2006,
 3 to a number of individuals within Eastern
 4 Health as well as Jane Bussey, a lawyer at
 5 Stewart McKelvey, and the "re: the dead" is
 6 "we must also be prepared. Our statement will
 7 need to be that in this almost ten-year period
 8 individuals have died either as a result of
 9 their breast cancer or for any one of numerous
 10 reasons. We did not retest these individuals
 11 because the purpose of the retest was to
 12 provide opportunities for individuals who
 13 could potentially benefit from a retest.
 14 However, if families would like to have their
 15 relatives' samples' retested, we can arrange
 16 that for them."
 17 MS. MUNDON:
 18 A. I'd also like to point out, if I may, in this
 19 e-mail that was sent to me, this paragraph,
 20 the previous paragraph to the one you just
 21 read.
 22 CHAYTOR, Q.C.:
 23 Q. Sure.
 24 MS. MUNDON:
 25 A. And it acknowledges here in this paragraph, it

Page 160

1 says "I guess the most"--and this is Ms.
 2 Bonnell to her senior staff, "I guess the most
 3 significant change you will note from the
 4 original material is the lack of a reference
 5 to a rate of error" and then she goes on to
 6 talk about that. But it acknowledges here
 7 that they had changed their original materials
 8 to take out a reference to a rate of error.
 9 CHAYTOR, Q.C.:
 10 Q. Yes.
 11 MS. MUNDON:
 12 A. Which I thought was a very important point
 13 when I received this e-mail.
 14 CHAYTOR, Q.C.:
 15 Q. Okay, and when you read that and picked up on
 16 that, did you then bring that to the attention
 17 of anyone within the Department?
 18 MS. MUNDON:
 19 A. Yes, I did. I provided a copy of it to the
 20 Minister and the Deputy Minister.
 21 CHAYTOR, Q.C.:
 22 Q. Okay, and what was the response?
 23 MS. MUNDON:
 24 A. I don't recall what their response would have
 25 been to it.

Page 161

1 CHAYTOR, Q.C.:

2 Q. And you, in doing that, in picking up on that

3 as being a significant change, you're saying

4 that shows that on December 9th--the e-mail

5 from Susan had been December 9th 2006?

6 MS. MUNDON:

7 A. Yes.

8 CHAYTOR, Q.C.:

9 Q. That they had changed their position from what

10 had been said in the November 23rd meeting?

11 Is that -

12 MS. MUNDON:

13 A. Well, it certainly hints to that. It

14 certainly demonstrates that they had changed

15 the material, you know, and have not advised

16 the Department that they've changed their

17 material.

18 CHAYTOR, Q.C.:

19 Q. Now I had understood though that they did

20 raise, in the meeting of November 23rd, that

21 they didn't like the terminology at least

22 "rate of error"?

23 MS. MUNDON:

24 A. Yes, that's correct.

25 CHAYTOR, Q.C.:

Page 162

1 Q. But you somehow, this is something different

2 than what was said on November 23rd?

3 MS. MUNDON:

4 A. I just saw this as being somewhat misleading,

5 I guess, in the fact that this e-mail

6 references the fact that they have changed

7 their material from what they had previously

8 planned on putting in there and again, like if

9 you're going to change your material, then a

10 heads up to the Department would have been a

11 nice idea.

12 CHAYTOR, Q.C.:

13 Q. Okay. But now the material that gets sent to

14 you is December 11th.

15 MS. MUNDON:

16 A. Yes.

17 CHAYTOR, Q.C.:

18 Q. All right. So you don't think that it was

19 changed again after it was sent to you?

20 MS. MUNDON:

21 A. No, I don't think it was changed again after

22 it was sent to me, but I'm just demonstrating

23 the fact that it had changed within Eastern

24 Health before it even got to me.

25 CHAYTOR, Q.C.:

Page 163

1 Q. Yes.

2 THE COMMISSIONER:

3 Q. Isn't that normal though? I mean, in the

4 sense of if you were preparing for a media

5 briefing which includes the drafting of

6 various kinds of documents, would you not

7 expect that in the course of that, there would

8 be some changes made?

9 MS. MUNDON:

10 A. I would expect that there would be changes

11 made, Madame Commissioner, but it just alerted

12 me. When I saw this, after knowing what I

13 knew at this point in time, that they hadn't

14 disclosed the information, that we had the

15 briefing and all those facts before me, I just

16 looked at this as thinking, you know, that

17 they had changed their original materials with

18 respect to the reference to rate of error, but

19 it just--I just wondered if they were

20 referencing--was this the point maybe perhaps

21 where they decided that they weren't going to

22 disclose all the numbers, like the change in

23 materials. It just was--I was just really

24 thinking at that time, what are they--what

25 else did they change from the time that they

Page 164

1 had met with the Department.

2 THE COMMISSIONER:

3 Q. The materials that were produced at the media

4 briefing, however, were not necessarily

5 brought to you on November the 23rd.

6 MS. MUNDON:

7 A. No, they weren't.

8 THE COMMISSIONER:

9 Q. We're talking about different documents, are

10 we not?

11 MS. MUNDON:

12 A. Yes, we are.

13 THE COMMISSIONER:

14 Q. So what you're concerned about is whether or

15 not the changes in content, not really a

16 change in a document?

17 MS. MUNDON:

18 A. Changes in content. Like they acknowledge

19 here--it's acknowledged here that there were

20 significant changes in the original material,

21 and I just wondered, at this point in time,

22 you know, the reference here about the change

23 in terms of a reference to a lack of error, is

24 this where they decided that they would not

25 disclose the numbers.

Page 165

1 THE COMMISSIONER:
 2 Q. That's your speculation?
 3 MS. MUNDON:
 4 A. That's my speculation.
 5 THE COMMISSIONER:
 6 Q. All right, thank you.
 7 CHAYTOR, Q.C.:
 8 Q. And Ms. Mundon, in forwarding this along to
 9 you, Ms. Bonnell says "this might help as well
 10 re: the dead." What was it that you were
 11 looking for help regarding?
 12 MS. MUNDON:
 13 A. I think it may have been the fact that they
 14 didn't disclose information regarding the
 15 deceased. I'm not quite sure at this point.
 16 CHAYTOR, Q.C.:
 17 Q. Did you have any discussion with her about
 18 that, about the deceased? Because this, in
 19 particular, is about re: the dead as she puts
 20 it. Was there discussion about what
 21 information went forward regarding the
 22 deceased?
 23 MS. MUNDON:
 24 A. There may have been discussion around that. I
 25 can't specifically recall that.

Page 166

1 CHAYTOR, Q.C.:
 2 Q. Okay. Now as I've just taken you through
 3 within the matter of about five minutes, Ms.
 4 Bonnell has sent you three lots of documents.
 5 MS. MUNDON:
 6 A. Yes.
 7 CHAYTOR, Q.C.:
 8 Q. And all relating back to what happened in
 9 December 2006.
 10 MS. MUNDON:
 11 A. Yes.
 12 CHAYTOR, Q.C.:
 13 Q. And I take it that was a subject of some
 14 concern and discussion within the Department
 15 that day?
 16 MS. MUNDON:
 17 A. Yes.
 18 CHAYTOR, Q.C.:
 19 Q. Were you also aware that there would be a
 20 Cabinet briefing the next day, May 17th?
 21 MS. MUNDON:
 22 A. I was told that afternoon, yes.
 23 CHAYTOR, Q.C.:
 24 Q. So you learned that on the afternoon of the
 25 16th?

Page 167

1 MS. MUNDON:
 2 A. Yes.
 3 CHAYTOR, Q.C.:
 4 Q. And these e-mails from Ms. Bonnell are all
 5 coming to you late in the afternoon?
 6 MS. MUNDON:
 7 A. Yes.
 8 CHAYTOR, Q.C.:
 9 Q. After--almost close to five p.m.
 10 MS. MUNDON:
 11 A. Yes.
 12 CHAYTOR, Q.C.:
 13 Q. So did you contact Ms. Bonnell and ask for her
 14 assistance in providing you information that
 15 you could use to prepare for the Cabinet
 16 briefing?
 17 MS. MUNDON:
 18 A. I don't think so, because we would have
 19 already had this information within the
 20 Department. The information that was used for
 21 the Cabinet briefing, we would have used--
 22 Moira, Ms. Hennessey and I would have used her
 23 files in the Department.
 24 CHAYTOR, Q.C.:
 25 Q. And you wouldn't have had this, I take it,

Page 168

1 particular e-mail exchange here with the--
 2 where she indicates "this might help as well,
 3 re: the dead." You would not have that
 4 document?
 5 MS. MUNDON:
 6 A. No, I wouldn't.
 7 CHAYTOR, Q.C.:
 8 Q. Okay. So you don't recall any discussion with
 9 Ms. Bonnell that you're preparing for a
 10 Cabinet briefing and need whatever background
 11 information may be available to assist with
 12 that?
 13 MS. MUNDON:
 14 A. I don't recall that, no.
 15 CHAYTOR, Q.C.:
 16 Q. So continuing on then into the evening of May
 17 16th, were you involved then in gathering the
 18 documentation and preparing a PowerPoint
 19 presentation for the next day?
 20 MS. MUNDON:
 21 A. Yes, I was.
 22 CHAYTOR, Q.C.:
 23 Q. And who worked on that with you?
 24 MS. MUNDON:
 25 A. Ms. Hennessey.

Page 169

1 CHAYTOR, Q.C.:

2 Q. And how did that go?

3 MS. MUNDON:

4 A. Well, it had to be--Ms. Hennessey was given

5 the task of preparing the presentation.

6 However, she asked for my assistance because

7 it had to be in PowerPoint, and so she asked

8 my assistance with respect to that. We used

9 the files that Ms. Hennessey and myself would

10 have had, and given a very tight time frame to

11 pull together a presentation on the issue.

12 CHAYTOR, Q.C.:

13 Q. And so you assisted from a technical point of

14 view with the PowerPoint presentation?

15 MS. MUNDON:

16 A. Yes.

17 CHAYTOR, Q.C.:

18 Q. And putting that together?

19 MS. MUNDON:

20 A. Yes.

21 CHAYTOR, Q.C.:

22 Q. And where did you gather the information for

23 the PowerPoint?

24 MS. MUNDON:

25 A. Through existing files that we would have had

Page 170

1 in the Department.

2 CHAYTOR, Q.C.:

3 Q. And what did you--what files did you have on

4 ER/PR at that point in time?

5 MS. MUNDON:

6 A. Would have had Ms. Hennessey's file and a file

7 within the communications division with mainly

8 media clippings.

9 CHAYTOR, Q.C.:

10 Q. And I take it you would have had briefing

11 notes as well?

12 MS. MUNDON:

13 A. Yes, that would be in Ms. Hennessey's files.

14 CHAYTOR, Q.C.:

15 Q. And did anyone else assist in that preparation

16 of the documents that evening?

17 MS. MUNDON:

18 A. The Deputy Minister would have reviewed the

19 presentation and signed off on it.

20 CHAYTOR, Q.C.:

21 Q. Okay, and was the Minister also involved?

22 MS. MUNDON:

23 A. Yes, the Minister would have been aware that

24 we were preparing the presentation and would

25 have stopped in my office at several points

Page 171

1 throughout the evening.

2 CHAYTOR, Q.C.:

3 Q. And what input did the Minister give in

4 preparing the presentation?

5 MS. MUNDON:

6 A. I think he was mainly letting us put the

7 presentation together and just reviewing it

8 after the fact.

9 CHAYTOR, Q.C.:

10 Q. Did he indicate to you what he would expect to

11 see in the presentation, what issues or

12 subjects did he want to see covered off?

13 MS. MUNDON:

14 A. I think there was some discussion around that,

15 yes?

16 CHAYTOR, Q.C.:

17 Q. And what did you understand was supposed to be

18 in the presentation? What questions or issues

19 were to be addressed?

20 MS. MUNDON:

21 A. Well, the issues and ultimately--the headings

22 that are ultimately in the presentation would

23 be what the Minister would have wanted there.

24 CHAYTOR, Q.C.:

25 Q. Okay. So questions along the lines of -

Page 172

1 MS. MUNDON:

2 A. The background.

3 CHAYTOR, Q.C.:

4 Q. - what the Department knew, when the

5 Department knew it?

6 MS. MUNDON:

7 A. Yes.

8 CHAYTOR, Q.C.:

9 Q. Those kinds of questions?

10 MS. MUNDON:

11 A. Yes.

12 CHAYTOR, Q.C.:

13 Q. Okay.

14 THE COMMISSIONER:

15 Q. So that would have been determined by the

16 Minister or he just would have said that's

17 okay?

18 MS. MUNDON:

19 A. He would have provided some direction, Madame

20 Commissioner, along with the Deputy Minister,

21 and the Deputy Minister would have been

22 presenting to Cabinet the following day.

23 CHAYTOR, Q.C.:

24 Q. Is there anything else then that stands out in

25 your mind in terms of preparing that document

Page 173

1 or the document, the presentation that
 2 evening? Is there anything that--for example,
 3 anything that you didn't have that you needed?
 4 MS. MUNDON:
 5 A. Just the fact that it was put together in a
 6 very tight time frame and I just felt that it
 7 was--there was a great chance that there may
 8 be errors in this presentation, knowing that
 9 it was being put together in such a tight time
 10 frame.
 11 CHAYTOR, Q.C.:
 12 Q. In this period of time, over the course of
 13 those couple of days, May 16th, May 17th, was
 14 there any discussion in the Department about
 15 the external review reports?
 16 MS. MUNDON:
 17 A. Just that it was my understanding that the
 18 reviews were protected under the Evidence Act.
 19 CHAYTOR, Q.C.:
 20 Q. Okay, and who indicated that to you?
 21 MS. MUNDON:
 22 A. I think it would have been Ms. Hennessey and
 23 Mr. Abbott.
 24 CHAYTOR, Q.C.:
 25 Q. Okay, and did that subject matter come up in

Page 174

1 preparing the Cabinet presentation?
 2 MS. MUNDON:
 3 A. That was included in the Cabinet presentation
 4 in the speaking points down below for Mr.
 5 Abbott.
 6 CHAYTOR, Q.C.:
 7 Q. Yes, and who included that?
 8 MS. MUNDON:
 9 A. I would have put that in there, as I was
 10 preparing the presentation.
 11 CHAYTOR, Q.C.:
 12 Q. And were you asked to put that in there?
 13 MS. MUNDON:
 14 A. I'm not sure if I was asked to put it in there
 15 or not.
 16 CHAYTOR, Q.C.:
 17 Q. When did you learn that there was some
 18 protection afforded these reports or there was
 19 some claim to protection to these reports
 20 under the Evidence Act?
 21 MS. MUNDON:
 22 A. I can't recall specifically when I would have
 23 been told that.
 24 CHAYTOR, Q.C.:
 25 Q. Was it that evening as you're preparing this

Page 175

1 or was it sometime before that?
 2 MS. MUNDON:
 3 A. I'm not sure.
 4 CHAYTOR, Q.C.:
 5 Q. So do you recall -
 6 MS. MUNDON:
 7 A. I think it may have been sometime before that,
 8 but I can't say for sure.
 9 CHAYTOR, Q.C.:
 10 Q. Okay. So when did you realize that the
 11 reports existed but there was a claim of
 12 protection for the reports?
 13 MS. MUNDON:
 14 A. I don't recall any real discussion around the
 15 reports in the Department in the early days of
 16 dealing with this issue.
 17 CHAYTOR, Q.C.:
 18 Q. So do you recall any discussion around it
 19 during Minister Ottenheimer's time?
 20 MS. MUNDON:
 21 A. No, I don't.
 22 CHAYTOR, Q.C.:
 23 Q. Do you recall any discussion around it during
 24 Minister Osborne's time?
 25 MS. MUNDON:

Page 176

1 A. No, I don't. I think it would have been under
 2 Minister Wiseman.
 3 CHAYTOR, Q.C.:
 4 Q. So it's the spring of 2007?
 5 MS. MUNDON:
 6 A. Yes.
 7 CHAYTOR, Q.C.:
 8 Q. That you first hear that?
 9 MS. MUNDON:
 10 A. Yes.
 11 CHAYTOR, Q.C.:
 12 Q. And you believe it was Ms. Hennessey and Mr.
 13 Abbott who brought that to your attention?
 14 MS. MUNDON:
 15 A. I believe so.
 16 CHAYTOR, Q.C.:
 17 Q. And did either of them indicate to you whether
 18 or not the Department had ever requested the
 19 reports?
 20 MS. MUNDON:
 21 A. I'm not aware if they had requested them or
 22 not. I can't recall if they would have.
 23 CHAYTOR, Q.C.:
 24 Q. Do you recall them ever saying to you that
 25 "we've requested the reports"?

Page 177

1 MS. MUNDON:
 2 A. No, I don't recall that.
 3 CHAYTOR, Q.C.:
 4 Q. Do you recall Ms. Hennessey saying whether or
 5 not she'd ever requested any information out
 6 of the reports?
 7 MS. MUNDON:
 8 A. I don't recall her saying that.
 9 CHAYTOR, Q.C.:
 10 Q. So that's something that--and again, the issue
 11 only comes up--it's only a year ago, if it's
 12 the spring of 2007.
 13 MS. MUNDON:
 14 A. Yes.
 15 CHAYTOR, Q.C.:
 16 Q. So if there had been any discussion within
 17 your earshot of the Department looking for
 18 those reports, do you think you would remember
 19 that?
 20 MS. MUNDON:
 21 A. I think I would remember, yes.
 22 CHAYTOR, Q.C.:
 23 Q. So the only thing you can recall being
 24 discussed about the reports is that there was
 25 some claim to protection of the reports?

Page 178

1 MS. MUNDON:
 2 A. Yes.
 3 CHAYTOR, Q.C.:
 4 Q. Did you have any understanding as to what may
 5 be in those reports?
 6 MS. MUNDON:
 7 A. No, not really, I don't recall any detailed
 8 discussion around the reports.
 9 CHAYTOR, Q.C.:
 10 Q. Did you understand whether or not the reports
 11 may be able to potentially answer the question
 12 of what went wrong?
 13 MS. MUNDON:
 14 A. No, I wasn't aware of that.
 15 CHAYTOR, Q.C.:
 16 Q. Is there anything then, the next day, May 17th
 17 2007, about the Cabinet briefing that stands
 18 out in your mind?
 19 MS. MUNDON:
 20 A. Just that myself and Ms. Hennessey, along with
 21 Mr. Tilley and Dr. Howell, had gone over to--
 22 outside the--the area outside the Cabinet
 23 room, just to be, just kind of be on call type
 24 thing when Mr. Abbott was presenting to the
 25 Cabinet.

Page 179

1 CHAYTOR, Q.C.:
 2 Q. And did you also sit outside the Cabinet room?
 3 MS. MUNDON:
 4 A. Yes, I did.
 5 CHAYTOR, Q.C.:
 6 Q. You sat outside with them?
 7 MS. MUNDON:
 8 A. Yes.
 9 CHAYTOR, Q.C.:
 10 Q. And did you walk over to the Cabinet room with
 11 them?
 12 MS. MUNDON:
 13 A. Yes, I did.
 14 CHAYTOR, Q.C.:
 15 Q. Did you have any discussion with them while
 16 you were sitting outside the Cabinet room or
 17 as you walked along?
 18 MS. MUNDON:
 19 A. Just general conversation.
 20 CHAYTOR, Q.C.:
 21 Q. Was there any discussion about the ER/PR
 22 issue?
 23 MS. MUNDON:
 24 A. Not that I recall.
 25 CHAYTOR, Q.C.:

Page 180

1 Q. How long did you wait outside that day?
 2 MS. MUNDON:
 3 A. It would have been over an hour.
 4 CHAYTOR, Q.C.:
 5 Q. Okay, and the issue of ER/PR wasn't discussed?
 6 MS. MUNDON:
 7 A. No, not that I recall, no.
 8 CHAYTOR, Q.C.:
 9 Q. Was Ms. Bonnell there?
 10 MS. MUNDON:
 11 A. No, she was not.
 12 CHAYTOR, Q.C.:
 13 Q. If we could look at P-1222, please? This is
 14 an e-mail exchange between yourself and Ms.
 15 Bonnell on the afternoon of May 17th. May
 16 17th at 2:18 p.m., you write to Ms. Bonnell,
 17 subject briefing, and I'm thinking there must
 18 be something before that, but this is the only
 19 page to the exhibit, because it says "need
 20 details ASAP. Just confirmed in the House of
 21 Assembly and media will want to know ASAP."
 22 Do you recall what this is about, Ms. Mundon?
 23 MS. MUNDON:
 24 A. This is in reference to a media briefing in
 25 May of that year to provide the media with all

Page 181

1 of the information on this issue.
 2 CHAYTOR, Q.C.:
 3 Q. Okay, and so what did you understand about
 4 that? Who was asking Eastern Health to do
 5 that?
 6 MS. MUNDON:
 7 A. The Department was. Government was asking
 8 them to do that.
 9 CHAYTOR, Q.C.:
 10 Q. And who informed you of that?
 11 MS. MUNDON:
 12 A. I think it was the Deputy Minister.
 13 CHAYTOR, Q.C.:
 14 Q. And were you asked to contact Ms. Bonnell and
 15 tell Eastern Health through Ms. Bonnell?
 16 MS. MUNDON:
 17 A. I know that I would have contacted her. I
 18 don't know if that was the only contact that
 19 would have been made or if the Deputy would
 20 have contacted Mr. Tilley as well.
 21 CHAYTOR, Q.C.:
 22 Q. Okay. And Ms. Bonnell comes back to you
 23 within a couple of minutes and she said,
 24 "Tansy, what did he say - ask us to hold or
 25 told us to hold." What did you understand Ms.

Page 182

1 Bonnell to be asking by that question?
 2 MS. MUNDON:
 3 A. She's asking did the Minister say in response
 4 that he asked Eastern Health to hold the
 5 briefing or he told them to hold the briefing.
 6 CHAYTOR, Q.C.:
 7 Q. Did you have the sense that without a
 8 directive from the Minister that Eastern
 9 Health would not have held a briefing in May
 10 of 2007?
 11 MS. MUNDON:
 12 A. That is certainly the sense that I had.
 13 CHAYTOR, Q.C.:
 14 Q. And how did you derive that sense?
 15 MS. MUNDON:
 16 A. Well, for one thing, this e-mail - like,
 17 really, it's irrelevant if they were asked to
 18 hold or told to hold. The expectation was
 19 that they would have the media briefing. I
 20 also know that they had been refraining from
 21 commenting in the media up to that point in
 22 time. So if they weren't commenting in the
 23 media, why would they then go and have another
 24 media briefing.
 25 CHAYTOR, Q.C.:

Page 183

1 Q. And, Ms. Mundon, up to this point in time
 2 you've told us - or yesterday, I believe, you
 3 told the Commission about a sense of
 4 defensiveness that you felt in your
 5 communications with Eastern Health. Were you
 6 still finding a defensiveness in answers in
 7 May of 2007?
 8 MS. MUNDON:
 9 A. Yes.
 10 CHAYTOR, Q.C.:
 11 Q. And then you replied to Ms. Mundon--or, I'm
 12 sorry, to Ms. Bonnell, "Asked to hold briefing
 13 tomorrow," So it's "asked" as opposed to
 14 "directed."
 15 MS. MUNDON:
 16 A. Yes.
 17 CHAYTOR, Q.C.:
 18 Q. Were you aware that there had been a Cabinet
 19 directive?
 20 MS. MUNDON:
 21 A. No, I was not aware at the time.
 22 CHAYTOR, Q.C.:
 23 Q. Okay. And then you say "Premier also said so.
 24 Expectation is there." "And the Premier also
 25 said so," where did you get that information?

Page 184

1 MS. MUNDON:
 2 A. I think the Premier had made that comment
 3 either in the House that day or to the media
 4 that Eastern Health would hold the briefing.
 5 CHAYTOR, Q.C.:
 6 Q. And in May then in 2007, did you have
 7 discussions with the Premier's office around
 8 this ER/PR issue?
 9 MS. MUNDON:
 10 A. Yes, I did.
 11 CHAYTOR, Q.C.:
 12 Q. And who did you speak with?
 13 MS. MUNDON:
 14 A. Ms. Matthews.
 15 CHAYTOR, Q.C.:
 16 Q. Okay. And what were your discussions with Ms.
 17 Matthews about?
 18 MS. MUNDON:
 19 A. Just talking about, you know, arrangements for
 20 this briefing with Eastern Health and, you
 21 know, I was just keeping them in the loop as
 22 to what the plans were. And, certainly, by
 23 this time the level of trust was deteriorating
 24 so at this point in time I would say that the
 25 department was now micro-managing the issue,

Page 185

1 micro-managing certainly the briefing.
 2 CHAYTOR, Q.C.:
 3 Q. Okay. And when did you first in May 2007,
 4 when did you first contact Ms. Matthews on the
 5 issue and why did you make that contact?
 6 MS. MUNDON:
 7 A. I would have been in contact with her, I would
 8 say, that afternoon when the House was
 9 session.
 10 CHAYTOR, Q.C.:
 11 Q. So the afternoon -
 12 MS. MUNDON:
 13 A. Perhaps earlier that day.
 14 CHAYTOR, Q.C.:
 15 Q. The 16th or 17th?
 16 MS. MUNDON:
 17 A. It would have been the day--the Cabinet's
 18 briefing was on the 17th?
 19 CHAYTOR, Q.C.:
 20 Q. Yes.
 21 MS. MUNDON:
 22 A. It would have been that day.
 23 CHAYTOR, Q.C.:
 24 Q. Yes. Did Ms. Matthews or anyone else in the
 25 Premier's office review the material you put

Page 186

1 together for the Cabinet briefing prior to it
 2 being finalized?
 3 MS. MUNDON:
 4 A. No, they wouldn't have. There wouldn't have
 5 been time for that. The material was prepared
 6 and reviewed and approved by the Deputy
 7 Minister and the Minister.
 8 CHAYTOR, Q.C.:
 9 Q. Okay. So your contact then with Ms. Matthews
 10 came on the 17th.
 11 MS. MUNDON:
 12 A. Yes.
 13 CHAYTOR, Q.C.:
 14 Q. And what was the purpose then? Why did you
 15 contact her at that point in time?
 16 MS. MUNDON:
 17 A. I think it would have been following--coming
 18 out of the Cabinet meeting was when all the
 19 action would have started to take place with
 20 respect to arranging the media briefing.
 21 CHAYTOR, Q.C.:
 22 Q. Yes, but you didn't realize that that had come
 23 out of the Cabinet briefing.
 24 MS. MUNDON:
 25 A. You know, I could assume that it did, but I

Page 187

1 wasn't aware that there was an actual
 2 directive given.
 3 CHAYTOR, Q.C.:
 4 Q. Okay. Did you speak to her that day? She was
 5 in the Cabinet briefing, I take it.
 6 MS. MUNDON:
 7 A. Yes, she was.
 8 CHAYTOR, Q.C.:
 9 Q. Did you speak to her when she came out of the
 10 Cabinet briefing?
 11 MS. MUNDON:
 12 A. I wasn't in over outside the Cabinet room when
 13 Cabinet concluded so I wouldn't have talked to
 14 her over there.
 15 CHAYTOR, Q.C.:
 16 Q. Okay. So it was sometime after that.
 17 MS. MUNDON:
 18 A. Yes.
 19 CHAYTOR, Q.C.:
 20 Q. You go in your e-mail here to say, "Also
 21 commitment to brief Opposition, which I think
 22 should be done separately."
 23 MS. MUNDON:
 24 A. Yes.
 25 CHAYTOR, Q.C.:

Page 188

1 Q. And so, I take it, there was to be a briefing
 2 for the Opposition as well.
 3 MS. MUNDON:
 4 A. Yes.
 5 CHAYTOR, Q.C.:
 6 Q. And why should that be done separately?
 7 MS. MUNDON:
 8 A. We normally do media briefings separate.
 9 Media prefer to have it that way. It's the
 10 way it's done for, you know, news conferences
 11 and we have technical briefings. It's the way
 12 it's done for the budget and the like. The
 13 media like to have the opportunity to ask all
 14 of the questions at that time, and they don't
 15 want their time to be used by others asking
 16 questions.
 17 CHAYTOR, Q.C.:
 18 Q. Did you have any follow-up discussions with
 19 Ms. Bonnell on the 17th about this?
 20 MS. MUNDON:
 21 A. I can't recall if I did. I would assume that
 22 I would have been in contact with her just to
 23 see how things were going in terms of a date
 24 being set and things like that.
 25 CHAYTOR, Q.C.:

Page 189

1 Q. Okay. And you mentioned in answering my
 2 questions that at this point in time there's a
 3 loss of trust. What had changed? Why had the
 4 department at this point in time lost trust in
 5 Eastern Health?
 6 MS. MUNDON:
 7 A. I wouldn't say that they had fully lost trust
 8 in Eastern Health.
 9 CHAYTOR, Q.C.:
 10 Q. "Deteriorating," I think, was your word.
 11 MS. MUNDON:
 12 A. Yes, it was deteriorating.
 13 CHAYTOR, Q.C.:
 14 Q. Why?
 15 MS. MUNDON:
 16 A. Because of the fact that this information -
 17 there was briefing in November of 2006.
 18 CHAYTOR, Q.C.:
 19 Q. Yes.
 20 MS. MUNDON:
 21 A. The understanding was the information would be
 22 disclosed. That was the purpose of having the
 23 briefing, was to provide all the information
 24 to the public at that point in time. That
 25 didn't happen, we realized, in May of 2007.

Page 190

1 So now here we are in the same situation
 2 essentially all over again on the eve of
 3 having another briefing and, at that point in
 4 time, there was no longer going to be a level
 5 of trust that Eastern Health was going to
 6 handle this appropriately without the
 7 department ensuring that that be the case.
 8 CHAYTOR, Q.C.:
 9 Q. And, I take it, that view, as you said
 10 earlier, was shared by others in the
 11 department, not just your personal view.
 12 MS. MUNDON:
 13 A. Yes.
 14 CHAYTOR, Q.C.:
 15 Q. Okay. And those others in the department,
 16 including the Minister, was he aware that the
 17 government had the materials back in December
 18 of 2006 and that the media had, in fact,
 19 reported on the fact that Eastern Health had
 20 refused to release all the numbers.
 21 MS. MUNDON:
 22 A. I would assume that he was aware of that, yes.
 23 CHAYTOR, Q.C.:
 24 Q. Did the Minister express any deteriorating
 25 lack of trust or deteriorating level of trust,

Page 191

1 I should say, in anyone other than Eastern
 2 Health.
 3 MS. MUNDON:
 4 A. Not that I can remember, no.
 5 CHAYTOR, Q.C.:
 6 Q. Was there any discussion in the department
 7 around that?
 8 MS. MUNDON:
 9 A. No, not that I recall.
 10 CHAYTOR, Q.C.:
 11 Q. Okay. If we could look at P-0831, please.
 12 THE COMMISSIONER:
 13 Q. When you answered the question about the
 14 awareness of the Minister of the fact that the
 15 materials regarding the media briefing were
 16 within the department in December -
 17 MS. MUNDON:
 18 A. Uh-hm.
 19 THE COMMISSIONER:
 20 Q. You said words that lead me to believe that
 21 you had not informed him, but I just wanted to
 22 make sure whether or not you were truly aware
 23 of the Minister's knowledge of it, whether
 24 that was because the information had come from
 25 you or whether you were assuming that somebody

Page 192

1 else would have told the Minister.
 2 MS. MUNDON:
 3 A. I believe, Madam Commissioner, that I would
 4 have told him that and he would have a copy of
 5 the materials provided to him at that time.
 6 THE COMMISSIONER:
 7 Q. At which time?
 8 MS. MUNDON:
 9 A. In the spring of 2007.
 10 THE COMMISSIONER:
 11 Q. So do you recall telling the Minister that?
 12 You're saying "I believe I would have." Do
 13 you remember whether or not, in fact, you did
 14 tell the Minister?
 15 MS. MUNDON:
 16 A. I believe that I did.
 17 THE COMMISSIONER:
 18 Q. And that's based on the fact that that would
 19 have been your job or - you know what I mean?
 20 You see what my problem is? You're not saying
 21 "I remember tell the Minister." You're saying
 22 "I believe that I told the Minister." Now
 23 that to me indicates you are either not
 24 remembering it -
 25 MS. MUNDON:

Page 193

1 A. No, I seem to remember telling him that.
 2 THE COMMISSIONER:
 3 Q. Okay. Thank you.
 4 CHAYTOR, Q.C.:
 5 Q. Okay, Ms. Mundon, so what happened in December
 6 2006? Eastern Health did inform the department
 7 it would be refusing to release certain
 8 information, but that information, as you
 9 said, was imbedded--or I think your word may
 10 have been "buried" in the materials. It
 11 wasn't flagged for you, but -
 12 MS. MUNDON:
 13 A. That information--it didn't say in any of the
 14 materials though. It did reference respect
 15 (sic.) to a rate of error, but it doesn't
 16 reference in those materials the fact that
 17 they wouldn't be disclosing the full picture.
 18 CHAYTOR, Q.C.:
 19 Q. Yes. It does say that question nine that
 20 we've looked at does say that they don't think
 21 the overall number of changed results is
 22 relevant. Only the 117 was relevant.
 23 Anything else was a numbers game.
 24 MS. MUNDON:
 25 A. Yes.

Page 194

1 CHAYTOR, Q.C.:
 2 Q. Words to that effect.
 3 MS. MUNDON:
 4 A. Yes.
 5 CHAYTOR, Q.C.:
 6 Q. Okay. And when you reread it in the spring of
 7 2007, you acknowledge that it's there. The
 8 answer--or the fact that they're not going to
 9 provide certain answers is in the materials.
 10 So my question to you is that Eastern Health
 11 did provide the department with that
 12 information in December 2006, but what changes
 13 in May of 2007 is that there's now recognition
 14 that Eastern Health had not highlighted that
 15 fact for the department.
 16 MS. MUNDON:
 17 A. They had not brought it to the department's
 18 attention, certainly, and had left it up to
 19 the department to find out in the media.
 20 CHAYTOR, Q.C.:
 21 Q. They hadn't brought it to the department's
 22 attention in a sufficient enough manner for
 23 the department officials, such as yourself, to
 24 have recognized that.
 25 MS. MUNDON:

Page 195

1 A. It was number nine in a Q and A document of 16
 2 pages, and even then it doesn't spell out
 3 which specific numbers will be disclosed, and
 4 it doesn't state that numbers will not be
 5 disclosed.
 6 CHAYTOR, Q.C.:
 7 Q. And the numbers that are to be disclosed
 8 though are in the press release that you did
 9 read.
 10 MS. MUNDON:
 11 A. Yes.
 12 CHAYTOR, Q.C.:
 13 Q. Yes.
 14 MS. MUNDON:
 15 A. Which again is consistent with what they would
 16 have highlighted verbally in the meeting.
 17 CHAYTOR, Q.C.:
 18 Q. Yes.
 19 MS. MUNDON:
 20 A. The three percent margin of error.
 21 CHAYTOR, Q.C.:
 22 Q. P-0031 then we have on the screen, and this is
 23 the following day. I take it, nothing else
 24 happened that you can recall of any importance
 25 on the 17th?

Page 196

1 MS. MUNDON:
 2 A. No.
 3 CHAYTOR, Q.C.:
 4 Q. So on the 18th then we have an e-mail exchange
 5 with Susan Bonnell, and you're asking for
 6 briefing materials.
 7 MS. MUNDON:
 8 A. Yes.
 9 CHAYTOR, Q.C.:
 10 Q. And that morning bright and early, 7:09 A.M.,
 11 you write, "Susan, can you please e-mail me
 12 materials for the media briefing today.
 13 Thanks." And Ms. Bonnell gets back to say "We
 14 are still developing them, Tansy. We were
 15 here until midnight and I'm back again now to
 16 complete. Please feel welcome to come over
 17 here this morning. I'm concerned in our
 18 ability to give you really advanced materials
 19 as this is happening so quickly. I'd welcome
 20 your presence as we develop and refine our
 21 messaging this morning." And your response is
 22 "I don't want to get in your way. Know how
 23 frustrating that can be. I'll give you a call
 24 around 9 A.M." First of all, why were you
 25 asking for the briefing materials?

Page 197

1 MS. MUNDON:
 2 A. Because I wanted to review them before the
 3 briefing.
 4 CHAYTOR, Q.C.:
 5 Q. And why is that?
 6 MS. MUNDON:
 7 A. Because I didn't have a level of trust in the
 8 materials at this point in time.
 9 CHAYTOR, Q.C.:
 10 Q. Were you concerned that Eastern Health may not
 11 say what the department was looking to have
 12 said?
 13 MS. MUNDON:
 14 A. Yes, I was concerned about that.
 15 CHAYTOR, Q.C.:
 16 Q. Ms. Bonnell indicates that your presence would
 17 be welcomed to help them out.
 18 MS. MUNDON:
 19 A. Yes.
 20 CHAYTOR, Q.C.:
 21 Q. They seem to be in a bit of a bind. Why
 22 didn't you take her up on that invitation?
 23 MS. MUNDON:
 24 A. I did take her up on that invitation. It's
 25 just I e-mailed her at 8 o'clock.

Page 198

1 CHAYTOR, Q.C.:
 2 Q. Yes.
 3 MS. MUNDON:
 4 A. So she e-mails me back at 7:30. I e-mailed
 5 her back at almost 8 o'clock.
 6 CHAYTOR, Q.C.:
 7 Q. Uh-hm.
 8 MS. MUNDON:
 9 A. Saying that I will give her a call around 9
 10 A.M.
 11 CHAYTOR, Q.C.:
 12 Q. Yes.
 13 MS. MUNDON:
 14 A. I didn't want to go down there - when she
 15 states here that she is--she said, this "is
 16 happening quickly" and they're trying to
 17 refine their materials. I know what it's like
 18 when you're a time crunch and you're trying to
 19 put your materials together and someone is
 20 with their head over you looking down. So I
 21 wanted to be able to be there when the
 22 materials were somewhat refined to be able to
 23 look at them at that stage.
 24 CHAYTOR, Q.C.:
 25 Q. And as a Communications Director though, you

Page 199

1 could have offered more to the process than
 2 just looking over her shoulder perhaps.
 3 MS. MUNDON:
 4 A. I went down there that day and I did review
 5 their materials and I did sit in for a Q and A
 6 session with Mr. Tilley, so I wouldn't say
 7 that I wasn't present there and offering my
 8 viewpoints because I certainly was.
 9 CHAYTOR, Q.C.:
 10 Q. So did you attend there prior to the material
 11 being finalized?
 12 MS. MUNDON:
 13 A. Yes, I did.
 14 CHAYTOR, Q.C.:
 15 Q. So did you attend there prior to the material
 16 being finalized?
 17 MS. MUNDON:
 18 A. Yes, I did.
 19 CHAYTOR, Q.C.:
 20 Q. Okay. So you went over there before the
 21 briefing?
 22 MS. MUNDON:
 23 A. Yes.
 24 CHAYTOR, Q.C.:
 25 Q. And did you then have any input in terms of

Page 200

1 the material or the content for the briefing?
 2 MS. MUNDON:
 3 A. No, I did not.
 4 CHAYTOR, Q.C.:
 5 Q. Okay. So you reviewed it?
 6 MS. MUNDON:
 7 A. Yes.
 8 CHAYTOR, Q.C.:
 9 Q. But you didn't make any changes to it?
 10 MS. MUNDON:
 11 A. No.
 12 CHAYTOR, Q.C.:
 13 Q. So I take it it was satisfactory?
 14 MS. MUNDON:
 15 A. Yes.
 16 CHAYTOR, Q.C.:
 17 Q. Okay. And did you feel that if -
 18 MS. MUNDON:
 19 A. Again, based on the time line that we were
 20 working with, I mean, if I would have had more
 21 time to be reviewing it, maybe I would have
 22 suggested changes, but we were under
 23 significant time crunch here that day.
 24 CHAYTOR, Q.C.:
 25 Q. Yes. Well, you didn't go over until sometime

Page 201

1 after 9:00, I take it. What time was the
 2 briefing?
 3 MS. MUNDON:
 4 A. I can't remember specifically when the
 5 briefing -
 6 CHAYTOR, Q.C.:
 7 Q. Sometime that morning, was it?
 8 MS. MUNDON:
 9 A. Sometime that morning, yes, or maybe lunch
 10 time, I can't recall specifically when the
 11 briefing had occurred.
 12 CHAYTOR, Q.C.:
 13 Q. And if you had wanted to make revisions to the
 14 material, did you feel that at that point in
 15 time you had the authority to ask that that
 16 occur?
 17 MS. MUNDON:
 18 A. I felt that I could suggest that changes
 19 occur.
 20 CHAYTOR, Q.C.:
 21 Q. Okay. But would they--would you be able to
 22 direct that that happen?
 23 MS. MUNDON:
 24 A. Well, it's really a hypothetical question
 25 because I didn't direct that it happen, so -

Page 202

1 CHAYTOR, Q.C.:
 2 Q. What was the purpose in you reviewing the
 3 material?
 4 MS. MUNDON:
 5 A. Because I wanted to be satisfied in my own
 6 mind that there were no issues and if I did
 7 have any changes and it was refused, at that
 8 point in time I likely would have contacted
 9 the minister.
 10 CHAYTOR, Q.C.:
 11 Q. And he could have directed otherwise?
 12 MS. MUNDON:
 13 A. Well, I would have hoped that he could have at
 14 that point in time.
 15 CHAYTOR, Q.C.:
 16 Q. If we could look at, please, P-0832?
 17 MS. MUNDON:
 18 A. I have to add, as well, that that morning of
 19 that media briefing that they--that Eastern
 20 Health had hired an external communications
 21 company and they were down there that morning
 22 helping them prepare, as well, which gave me
 23 some confidence, as well, in terms of the
 24 preparation.
 25 CHAYTOR, Q.C.:

Page 203

1 Q. Okay. That was Bristol Communications?
 2 MS. MUNDON:
 3 A. Yes, that's correct.
 4 CHAYTOR, Q.C.:
 5 Q. And this is an e-mail to you, to, sorry, Ms.
 6 Bonnell from yourself, same date, before--so
 7 it's May 18th, before the briefing, 9:06 a.m.,
 8 briefing note. And you have sent along to Ms.
 9 Bonnell the updated briefing note from the
 10 department, May 17th, 2007. Now, Ms. Mundon,
 11 how usual is it to provide Eastern Health with
 12 copies of departmental briefing notes?
 13 MS. MUNDON:
 14 A. It's very unusual. I don't recall sending
 15 this. Obviously I did, it's in writing, but I
 16 would have had to receive direction in order
 17 to do so.
 18 CHAYTOR, Q.C.:
 19 Q. Direction from whom?
 20 MS. MUNDON:
 21 A. The deputy minister.
 22 CHAYTOR, Q.C.:
 23 Q. And why would you, in this context, send a
 24 copy of the department briefing note to
 25 Eastern Health?

Page 204

1 MS. MUNDON:
 2 A. Again, as I said, I would have had to receive
 3 direction. I can't remember why it was sent.
 4 CHAYTOR, Q.C.:
 5 Q. Had you ever sent a briefing note from the
 6 department to Eastern Health before?
 7 MS. MUNDON:
 8 A. No, I had not.
 9 CHAYTOR, Q.C.:
 10 Q. Or any of the health authorities?
 11 MS. MUNDON:
 12 A. No.
 13 CHAYTOR, Q.C.:
 14 Q. Have you ever done it since?
 15 MS. MUNDON:
 16 A. No.
 17 CHAYTOR, Q.C.:
 18 Q. Was your purpose in doing this to ensure that
 19 this is the information that the department
 20 wanted Eastern Health to speak to at the news
 21 conference or the briefing?
 22 MS. MUNDON:
 23 A. I can't recall that, why it was sent. As I
 24 said, I would have received direction in order
 25 to send it.

Page 205

1 CHAYTOR, Q.C.:

2 Q. Was there any concern that the messaging of

3 Eastern Health be consistent with what's

4 contained in the briefing note?

5 MS. MUNDON:

6 A. No, I don't think so. I never had any

7 discussion around that.

8 COMMISSIONER:

9 Q. I beg your pardon, I just didn't -

10 MS. MUNDON:

11 A. No, I said I -

12 COMMISSIONER:

13 Q. - speak up a little, please?

14 MS. MUNDON:

15 A. - don't think so, Madam Commissioner.

16 COMMISSIONER:

17 Q. Pardon?

18 MS. MUNDON:

19 A. I don't think so was my answer.

20 COMMISSIONER:

21 Q. All right. Thank you.

22 CHAYTOR, Q.C.:

23 Q. So you've never sent a briefing note before?

24 MS. MUNDON:

25 A. No.

Page 206

1 CHAYTOR, Q.C.:

2 Q. Very rare to do this?

3 MS. MUNDON:

4 A. Yes.

5 CHAYTOR, Q.C.:

6 Q. And you have no recollection, this is last

7 May?

8 MS. MUNDON:

9 A. Yes.

10 CHAYTOR, Q.C.:

11 Q. No recollection as to why you did this?

12 MS. MUNDON:

13 A. No, I don't. Again, as I said, I would have

14 had to receive direction in order to do so.

15 CHAYTOR, Q.C.:

16 Q. If we could have, please, P-1225?

17 REGISTRAR:

18 Q. (Inaudible).

19 CHAYTOR, Q.C.:

20 Q. 1225. Thank you. Ms. Mundon, this is another

21 e-mail, same date, about 20 minutes later that

22 you send to Ms. Bonnell from yourself, May

23 18th, '07 at 9:25 a.m. And this time you copy

24 Ms. Hennessey. And your subject is

25 "Questions" You've sent it high priority.

Page 207

1 And you say "Susan, you likely have these

2 included in your Q and A document. In the

3 event that you don't here are some questions I

4 think should come up." And then you have a

5 list of questions that you send to her. Do

6 you remember sending this document to Ms.

7 Bonnell? Sorry?

8 MS. MUNDON:

9 A. I remember, yes, I think I remember sending

10 her some questions that day.

11 CHAYTOR, Q.C.:

12 Q. So you remember sending the questions but not

13 the briefing note?

14 MS. MUNDON:

15 A. I don't know if I actually remember sending

16 the e-mail with the questions in it, but

17 because I went through the Q and As, I was

18 present at Eastern Health when the CEO was

19 going through a Q and A practice session with

20 Bristol Communications that I would have

21 remembered, I would have taken a copy of the Q

22 and As with me down there.

23 CHAYTOR, Q.C.:

24 Q. Yes.

25 MS. MUNDON:

Page 208

1 A. To see if they were included.

2 CHAYTOR, Q.C.:

3 Q. And these Q and As came from where?

4 MS. MUNDON:

5 A. These questions came from me.

6 CHAYTOR, Q.C.:

7 Q. Yes, came from you. So at this point in time

8 you haven't seen their Q and As?

9 MS. MUNDON:

10 A. No.

11 CHAYTOR, Q.C.:

12 Q. No. And so you sent this along before you

13 went down?

14 MS. MUNDON:

15 A. Yes.

16 CHAYTOR, Q.C.:

17 Q. Okay. And you've copied this to Ms.

18 Hennessey?

19 MS. MUNDON:

20 A. Yes.

21 CHAYTOR, Q.C.:

22 Q. Were you instructed by anyone to send this to

23 Ms. Bonnell?

24 MS. MUNDON:

25 A. These questions? I don't recall receiving any

Page 209

1 direction to send Q and As, but--or questions,
 2 rather, but maybe I did.
 3 CHAYTOR, Q.C.:
 4 Q. Okay. And you've identified--who helped you,
 5 did anyone help you come up with these
 6 questions?
 7 MS. MUNDON:
 8 A. Perhaps Ms. Hennessey. I can't recall.
 9 CHAYTOR, Q.C.:
 10 Q. Okay. And you included in your questions,
 11 "Why wasn't the error rate released? Did you
 12 withhold the information in December to
 13 prevent others from joining the class action
 14 suit? Do you now know what went wrong with
 15 the test results? Was it human error or due
 16 to outdated technology? If you don't know
 17 what went wrong, how can you move forward and
 18 be confident that the problem has been
 19 addressed?" And it goes on with other
 20 questions from there. Were any of those
 21 questions answered in the briefing that day?
 22 MS. MUNDON:
 23 A. I can't say if they were. I would assume that
 24 some of them were. I was at the briefing that
 25 day.

Page 210

1 CHAYTOR, Q.C.:
 2 Q. Yes.
 3 MS. MUNDON:
 4 A. And I know when I went down there that day, I
 5 took a copy of the Qs with me, the questions
 6 with me and I was satisfied when I was present
 7 for the practice question and answer session
 8 with Mr. Tilley that the most relevant
 9 questions were being--that he was going over
 10 the most relevant questions in the session.
 11 CHAYTOR, Q.C.:
 12 Q. And were one of those questions, "Do you know
 13 what went wrong with the test results?" "Was
 14 it human error or due to outdated technology?"
 15 MS. MUNDON:
 16 A. I'm not sure if that was one of the questions
 17 because there were a lot of questions.
 18 CHAYTOR, Q.C.:
 19 Q. Okay. Did you receive an answer to that
 20 question?
 21 MS. MUNDON:
 22 A. Down there that day?
 23 CHAYTOR, Q.C.:
 24 Q. Yes.
 25 MS. MUNDON:

Page 211

1 A. Before the briefing?
 2 CHAYTOR, Q.C.:
 3 Q. Yes.
 4 MS. MUNDON:
 5 A. I didn't go--there wasn't an opportunity for
 6 me to go through my questions or for them to
 7 give me written responses or verbal responses
 8 to my specific questions.
 9 CHAYTOR, Q.C.:
 10 Q. So I take it they didn't provide any answers
 11 to your questions?
 12 MS. MUNDON:
 13 A. Certainly not in writing.
 14 CHAYTOR, Q.C.:
 15 Q. Okay. Did anyone provide you with an answer
 16 to that particular question, "What went
 17 wrong?"
 18 MS. MUNDON:
 19 A. I can't recall if they did or not.
 20 CHAYTOR, Q.C.:
 21 Q. Did anyone discuss with you what they would
 22 say in response to that question?
 23 MS. MUNDON:
 24 A. I can't recall if they did or not. Again, it
 25 was, I was down there when they were getting

Page 212

1 ready and they were going through a number of
 2 questions with Mr. Tilley at that time.
 3 CHAYTOR, Q.C.:
 4 Q. If we could look, please, at 1613?
 5 COMMISSIONER:
 6 Q. Ms. Chaytor, when you can find a convenient
 7 spot, we'll break for lunch.
 8 CHAYTOR, Q.C.:
 9 Q. Thank you. And in this e-mail Ms. O'Neil-
 10 Yates is back in touch with you, it's the
 11 morning of the briefing at 9:52 a.m. May 18th
 12 and she's asking you "Will the briefing be a
 13 press conference or a technical briefing?
 14 What we need to know is whether we will have
 15 interviews? In December when Eastern Health
 16 gave a briefing, they didn't make anyone
 17 available on that day." And you get back to
 18 her and say, "Chris, this will be a briefing
 19 for the media. Susan is organizing and I have
 20 copied her on your e-mail so she can respond
 21 accordingly." Why would Ms. O'Neil-Yates
 22 contact you with questions about the briefing?
 23 MS. MUNDON:
 24 A. Probably just because we had a good working
 25 relationship and she just probably--she would

Page 213

1 know that I would be aware of the briefing and
 2 that I would likely get back to her in a
 3 timely fashion.
 4 CHAYTOR, Q.C.:
 5 Q. When the media were notified that this
 6 briefing was going to be taking place, who was
 7 named as the media contact?
 8 MS. MUNDON:
 9 A. I believe Ms. Bonnell was. Either Ms. Bonnell
 10 or Ms. Barrington within the organization.
 11 CHAYTOR, Q.C.:
 12 Q. But not you, not you?
 13 MS. MUNDON:
 14 A. Not me that I recall, no, I wouldn't have set
 15 that up.
 16 CHAYTOR, Q.C.:
 17 Q. So you said that you did attend the briefing?
 18 MS. MUNDON:
 19 A. Ms. Hennessey and I attended, yes.
 20 CHAYTOR, Q.C.:
 21 Q. Okay. And why--you didn't attend the one in
 22 December. Why was it felt necessary for you
 23 to now attend in May of 2007?
 24 MS. MUNDON:
 25 A. Well, the minister asked that we attend, but

Page 214

1 in addition to that, as I said earlier, that,
 2 you know, we certainly wanted to be there to
 3 ensure that we were aware of what happened in
 4 the briefing.
 5 CHAYTOR, Q.C.:
 6 Q. Yes. After reviewing the material you went
 7 down there that day and you said there was
 8 someone there from Bristol assisting?
 9 MS. MUNDON:
 10 A. Yes.
 11 CHAYTOR, Q.C.:
 12 Q. And you sat through at least a portion of Mr.
 13 Tilley being prepared for the Q and A?
 14 MS. MUNDON:
 15 A. Yes.
 16 CHAYTOR, Q.C.:
 17 Q. After reviewing the material and observing
 18 what you observed, did you report back to the
 19 minister?
 20 MS. MUNDON:
 21 A. Yes, I did.
 22 CHAYTOR, Q.C.:
 23 Q. Okay. And what did you say to the minister?
 24 MS. MUNDON:
 25 A. I think I would have told him that I thought

Page 215

1 that the briefing went fairly well, that the
 2 media -
 3 CHAYTOR, Q.C.:
 4 Q. No, before, I'm sorry, I didn't make that
 5 clear -
 6 MS. MUNDON:
 7 A. Oh, sorry, before the -
 8 CHAYTOR, Q.C.:
 9 Q. Before, yes. After reviewing the material and
 10 before the briefing going ahead, did you
 11 report back to the minister?
 12 MS. MUNDON:
 13 A. Yes, I did, and I think I told him that I felt
 14 confident that things were under control. It
 15 seemed that they were going to be forthcoming
 16 with all of the information and that Mr.
 17 Tilley seemed prepared to be able to respond
 18 to the questions that would be asked of him.
 19 CHAYTOR, Q.C.:
 20 Q. Okay. Did you also report back to the
 21 Premier's office?
 22 MS. MUNDON:
 23 A. I'm not sure if I reported back to the
 24 Premier's office at that point in time or if
 25 the minister may have been in touch with them.

Page 216

1 CHAYTOR, Q.C.:
 2 Q. Okay. So I take it at this point in time
 3 there's a very close eye being kept on what's
 4 happening on this issue?
 5 MS. MUNDON:
 6 A. Yes.
 7 CHAYTOR, Q.C.:
 8 Q. Then tell us what happened with the press
 9 conference, how did it go?
 10 MS. MUNDON:
 11 A. I thought it went well. I felt that the media
 12 had an opportunity to ask the questions that
 13 they wanted to ask. They also had the
 14 opportunity to do follow-up interviews after
 15 the press conference was over, after the
 16 technical briefing was over.
 17 CHAYTOR, Q.C.:
 18 Q. Was there any discussion between yourself and
 19 Ms. Bonnell prior to the press conference
 20 taking place?
 21 MS. MUNDON:
 22 A. In what context?
 23 CHAYTOR, Q.C.:
 24 Q. In terms of the press release that was going
 25 to be distributed.

Page 217

1 MS. MUNDON:
 2 A. She handed me a package of final materials.
 3 CHAYTOR, Q.C.:
 4 Q. Yes.
 5 MS. MUNDON:
 6 A. And I do not recall any other conversation
 7 around that.
 8 CHAYTOR, Q.C.:
 9 Q. Okay. And who distributed the news release at
 10 the press conference?
 11 MS. MUNDON:
 12 A. Ms. Bonnell did or Ms. Bonnell's staff.
 13 CHAYTOR, Q.C.:
 14 Q. Was there any discussion between yourself and
 15 Ms. Bonnell in which she asked that you
 16 distribute it?
 17 MS. MUNDON:
 18 A. Not in this instance, no.
 19 CHAYTOR, Q.C.:
 20 Q. Okay. So that was another press conference, I
 21 take it?
 22 MS. MUNDON:
 23 A. Yes.
 24 CHAYTOR, Q.C.:
 25 Q. Okay. So overall were you pleased with the

Page 218

1 press conference, did all the information come
 2 out that you thought should come out?
 3 MS. MUNDON:
 4 A. Overall I thought it went well and I thought
 5 that the media seemed to be satisfied with the
 6 opportunity to ask the questions. I didn't
 7 hear any issues expressed by the media at that
 8 briefing.
 9 CHAYTOR, Q.C.:
 10 Q. Okay. Did anyone at the press conference ask
 11 the question, one of the questions, actually,
 12 that you posed and that Chris O'Neil-Yates had
 13 been asking back in November, did anyone ask
 14 what went wrong, what caused the problem?
 15 MS. MUNDON:
 16 A. I'm not sure if they asked that question, but
 17 again, as I've indicated many times, I still
 18 don't have the answer to that question.
 19 CHAYTOR, Q.C.:
 20 Q. So you don't remember one way or the other
 21 whether the question was asked and, if so,
 22 what answer was given?
 23 MS. MUNDON:
 24 A. I don't remember. There were a lot of
 25 questions at that session.

Page 219

1 CHAYTOR, Q.C.:
 2 Q. This is a convenient place, Commissioner.
 3 COMMISSIONER:
 4 Q. All right, then, we'll break until 10 after 2.
 5 Thank you.
 6 (LUNCH BREAK)
 7 COMMISSIONER:
 8 Q. Please be seated. Before we begin, Ms.
 9 Chaytor, as I understand it there's a small
 10 problem with the wireless at the moment. It's
 11 being worked on. I'm told it should be up and
 12 running very shortly. If it becomes a problem
 13 for any of you, let me know and we can break
 14 if you need to get into your computers or
 15 whatever. Now, Ms. Chaytor.
 16 CHAYTOR, Q.C.:
 17 Q. Thank you, Commissioner. Good afternoon, Ms.
 18 Mundon.
 19 MS. MUNDON:
 20 A. Good afternoon.
 21 CHAYTOR, Q.C.:
 22 Q. Ms. Mundon, yesterday I asked you a question
 23 and I believe your answer was not until the
 24 spring of 2007, so I said, well, we'll get to
 25 the spring of 2007.

Page 220

1 MS. MUNDON:
 2 A. Yes.
 3 CHAYTOR, Q.C.:
 4 Q. So since we're there, I'll pose the question
 5 to you again. And my question was at some
 6 point in time did the department come to the
 7 realization that there was information not
 8 provided to it by Eastern Health regarding the
 9 ER/PR issue and if so, what was that
 10 information?
 11 MS. MUNDON:
 12 A. The information, well, there was a whole issue
 13 of the fact that they didn't disclose that
 14 piece of information and, as well, in the, I
 15 believe it was the summer of 2007, I'm not
 16 sure if the spring or the summer when Mr.
 17 Thompson had discovered that there was some
 18 discrepancy with the numbers around patient
 19 notification. And at that time it was
 20 discovered that despite the fact that the
 21 department was repeatedly told that all
 22 patients had been contacted, we found out that
 23 that had not been the case.
 24 CHAYTOR, Q.C.:
 25 Q. Okay. If we could have, please, P-0835? This

Page 221

1 is an e-mail from yourself to Tom Brophy.
 2 Who's Tom Brophy?
 3 MS. MUNDON:
 4 A. He was Minister Wiseman's policy advisor.
 5 CHAYTOR, Q.C.:
 6 Q. Okay. And it's May 18th, 2007 at 12:27 p.m.
 7 And you're asking that "Can you please contact
 8 all MHAS, all parties ASAP to advise them
 9 there will be a briefing on ER/PR?" And the
 10 date and time and place is noted. So you're,
 11 I take it, arranging or asking Mr. Brophy to
 12 make the arrangements for the MHA briefing
 13 which took place. Did you have any other
 14 involvement in preparation for that briefing?
 15 MS. MUNDON:
 16 A. No, we did not.
 17 CHAYTOR, Q.C.:
 18 Q. Did you attend?
 19 MS. MUNDON:
 20 A. No, I did not.
 21 CHAYTOR, Q.C.:
 22 Q. If we could have, please, P-1226? And who in
 23 the department do you understand did do the
 24 preparation for the MHA briefing?
 25 MS. MUNDON:

Page 222

1 A. The MHA briefing was provided by Eastern
 2 Health. I was involved in terms of ensuring
 3 that the MHAS were made aware of the briefing.
 4 CHAYTOR, Q.C.:
 5 Q. Okay. But in terms of the content, you had no
 6 input into -
 7 MS. MUNDON:
 8 A. No, I did not.
 9 CHAYTOR, Q.C.:
 10 Q. - anything that was presented?
 11 MS. MUNDON:
 12 A. No. It was my understanding that it would be
 13 consistent material than what would have been
 14 provided at the media briefing.
 15 CHAYTOR, Q.C.:
 16 Q. Okay. And P-1226 is an e-mail from yourself
 17 to Ms. Bonnell, May 18th, 2007, 12:43. I'm
 18 sorry, it's originally from Ms. Cheeseman to
 19 yourself, copied to Ms. Matthews and Carmel
 20 Turpin at 12:37 on that date, and the subject
 21 is "Newsworld." "Tansy, Newsworld's lead in
 22 to live report was totally wrong. She said
 23 people who thought they didn't have cancer
 24 actually had it. Susan or someone should set
 25 them straight." And then I take it you

Page 223

1 forwarded that on then to Ms. Bonnell?
 2 MS. MUNDON:
 3 A. I also spoke to her at the briefing.
 4 CHAYTOR, Q.C.:
 5 Q. About this?
 6 MS. MUNDON:
 7 A. Yes.
 8 CHAYTOR, Q.C.:
 9 Q. Okay. The briefing on the 18th, I take it?
 10 MS. MUNDON:
 11 A. Yes.
 12 CHAYTOR, Q.C.:
 13 Q. Okay. And what did you discuss with Ms.
 14 Bonnell around this?
 15 MS. MUNDON:
 16 A. Just that she should perhaps clarify with the
 17 reporter who was there on site that the lead
 18 in to the story was inaccurate.
 19 CHAYTOR, Q.C.:
 20 Q. Okay. So the reporter who had done this story
 21 was actually at the media briefing on the
 22 18th?
 23 MS. MUNDON:
 24 A. There was a host, the anchor was actually in
 25 Toronto somewhere on the desk, but there was a

Page 224

1 reporter who was feeding in information to the
 2 news desk, so that would be the way to get
 3 back to them to let them--notify them that the
 4 information was inaccurate.
 5 CHAYTOR, Q.C.:
 6 Q. Okay.
 7 MS. MUNDON:
 8 A. And to correct it.
 9 CHAYTOR, Q.C.:
 10 Q. So you receive this from Ms. Cheeseman while
 11 you're still at the -
 12 MS. MUNDON:
 13 A. Yes.
 14 CHAYTOR, Q.C.:
 15 Q. - briefing and the briefing is still ongoing?
 16 MS. MUNDON:
 17 A. Yes.
 18 CHAYTOR, Q.C.:
 19 Q. And so you spoke then and there to Ms. Bonnell
 20 about it?
 21 MS. MUNDON:
 22 A. Yes.
 23 CHAYTOR, Q.C.:
 24 Q. Okay. And do you know what, if anything, Ms.
 25 Bonnell did about this?

Page 225

1 MS. MUNDON:
 2 A. I'm not sure. I assumed that she had talked
 3 to the reporter. I believe I saw her going
 4 over to approach the reporter to let them know
 5 that there needed to be a correction to the
 6 information.
 7 CHAYTOR, Q.C.:
 8 Q. And did you see her do that?
 9 MS. MUNDON:
 10 A. I saw her approach the reporter, yes.
 11 CHAYTOR, Q.C.:
 12 Q. And so you assumed it was after you had spoken
 13 to her about it?
 14 MS. MUNDON:
 15 A. Yes.
 16 CHAYTOR, Q.C.:
 17 Q. And do you know whether or not the story was
 18 corrected?
 19 MS. MUNDON:
 20 A. I'm not aware if it was or not. I would have
 21 been down at the briefing at that time.
 22 CHAYTOR, Q.C.:
 23 Q. Okay. If we could have, please, P-1227? And
 24 this is an e-mail that afternoon, Friday, May
 25 18th, at 2:52 p.m. from yourself again to Ms.

Page 226

1 Bonnell, and this one is copied to Mr. Tilley,
 2 Mr. Abbott and Ms. Hennessey and its subject
 3 is "Clarification" "Susan, VOCM is reporting
 4 the issue as breast screening. Can you please
 5 call to correct? Thanks. Tansy." And then
 6 you have a clipping or notes from the
 7 coverage. Did you have any discussion with
 8 Ms. Bonnell around this?
 9 MS. MUNDON:
 10 A. No, I didn't.
 11 CHAYTOR, Q.C.:
 12 Q. Okay. And do you know whether or not Ms.
 13 Bonnell actually called in to correct the
 14 story?
 15 MS. MUNDON:
 16 A. I'm not sure if she did or not, but I was
 17 certainly bringing it to her attention with
 18 that intention in mind that she call to
 19 correct it.
 20 CHAYTOR, Q.C.:
 21 Q. And I take it at this point in time, Ms.
 22 Mundon, that you're keeping a very close eye
 23 and scrutinizing the media coverage around
 24 this issue?
 25 MS. MUNDON:

Page 227

1 A. Correct.
 2 CHAYTOR, Q.C.:
 3 Q. To the point where you're detecting when
 4 they're saying breast cancer screening versus
 5 ER/PR?
 6 MS. MUNDON:
 7 A. Correct.
 8 CHAYTOR, Q.C.:
 9 Q. If we could look at P-0206, please? And did
 10 you get any feedback from Ms. Bonnell in your
 11 efforts to correct stories or ask for
 12 clarifications, did you get any feedback from
 13 Ms. Bonnell one way or the other, any
 14 hesitancy on her part?
 15 MS. MUNDON:
 16 A. I don't recall any hesitancy on her part.
 17 CHAYTOR, Q.C.:
 18 Q. And this is the, again, about the MHA briefing
 19 and it's whether or not it's going to be
 20 public. It's an e-mail exchange regarding
 21 that to yourself from Debbie Robbins. "Do we
 22 know yet whether the issue will be public or
 23 not?" And you respond by saying, "The e-mail
 24 should refer to MHA briefing at this time. We
 25 will review the need for a separate public

Page 228

1 briefing if necessary, but this should not be
 2 referenced in the e-mail and only if question
 3 asked. We are open to the idea." What was
 4 this all about, Ms. Mundon?
 5 MS. MUNDON:
 6 A. It was just a question that was posed to me by
 7 the minister's, in this case, constituency
 8 assistant on behalf of Mr. Brophy. They just
 9 wanted to know, I believe maybe one MHA had
 10 asked if it was a public briefing, and I had
 11 gone back and asked the question of the
 12 minister, I believe, if it would be a public
 13 briefing or an MHA briefing only because we
 14 would have a capacity issue if it were to
 15 extend beyond an MHA briefing, we would just
 16 need to move it to a larger venue.
 17 CHAYTOR, Q.C.:
 18 Q. I take public meaning members from the public
 19 could be invited to attend, as well?
 20 MS. MUNDON:
 21 A. Yes. Now, that being said, we certainly would
 22 not be turning anyone away at the door.
 23 CHAYTOR, Q.C.:
 24 Q. Okay. And what was the concern with not
 25 referencing in the e-mail and only if the

Page 229

1 question is asked whether a separate public
 2 briefing would take place?
 3 MS. MUNDON:
 4 A. Just that we weren't--we didn't want to turn
 5 away people from the public. If it was going
 6 to be a public briefing, we would need to
 7 secure a larger venue.
 8 CHAYTOR, Q.C.:
 9 Q. And if we could have, please, 0845? And this
 10 is again on the May 18th and it's at 5:06
 11 p.m., subject is "Transcripts" "Susan, I have
 12 arranged for 709 News to e-mail both you and I
 13 all transcripts on this topic from 12:30 p.m.
 14 on today, including Newsworld coverage. We
 15 will receive transcripts throughout the week
 16 and it will discontinue on Tuesday a.m. Thank
 17 for all your hard work on this outstanding job
 18 with the briefing today. Please pass along my
 19 thanks to others." Signed, "Tansy." So I take
 20 it you were pleased with how the briefing had
 21 gone on May 18th?
 22 MS. MUNDON:
 23 A. Yes, I was.
 24 CHAYTOR, Q.C.:
 25 Q. Yes. And why had you arranged for 709 News to

Page 230

1 send both you and Ms. Bonnell all the
 2 transcripts on the topic?
 3 MS. MUNDON:
 4 A. I wanted to monitor the news coverage
 5 throughout the weekend in real time, and
 6 typically unless we request that it happen in
 7 real time over the weekend, it won't happen
 8 until the previous weekday or the following
 9 weekday. So I had to make special
 10 arrangements through the communications and
 11 consultations branch to ensure that I would
 12 receive media coverage throughout the weekend.
 13 CHAYTOR, Q.C.:
 14 Q. Okay. And why was that important at this
 15 point in time?
 16 MS. MUNDON:
 17 A. Well, I just wanted to make sure that, you
 18 know, that I was closely monitoring the
 19 coverage and what was being said and to ensure
 20 that there was no discrepancy.
 21 CHAYTOR, Q.C.:
 22 Q. And had anyone instructed you to do this?
 23 MS. MUNDON:
 24 A. No, not that I recall.
 25 CHAYTOR, Q.C.:

Page 231

1 Q. And why would you include Eastern Health in
 2 this?
 3 MS. MUNDON:
 4 A. Because they were, you know, managing the file
 5 and they had held the media briefing and I
 6 just did it as a courtesy for them so that
 7 they could also see at the same time for the
 8 same cost what news coverage was being
 9 provided.
 10 CHAYTOR, Q.C.:
 11 Q. And is Eastern Health still managing the file
 12 at this point in time?
 13 MS. MUNDON:
 14 A. I assume so, yes.
 15 CHAYTOR, Q.C.:
 16 Q. From a communications point of view?
 17 MS. MUNDON:
 18 A. Yes.
 19 CHAYTOR, Q.C.:
 20 Q. If we could have P-0445, please? And, Ms.
 21 Mundon, this is an e-mail exchange between
 22 yourself and Minister Wiseman, May 18th, as
 23 well, 2007. And I'll just take you to the
 24 bottom here where it begins. Back up here.
 25 And actually, the e-mail begins, it's from

Page 232

1 yourself to a number of people, including Mr.
 2 Tilley, Ms. Bonnell, Ms. Matthews, Ms.
 3 Cheeseman, Mr. Abbott, Ms. Hennessey, Minister
 4 Wiseman and Ms. Vokey, and it's at 6:36 p.m.
 5 And the subject "Eastern Health Apologizes for
 6 Withholding Cancer Details." And then there's
 7 a number of clippings or references to the
 8 media coverage that you were sending along?
 9 MS. MUNDON:
 10 A. Yes.
 11 CHAYTOR, Q.C.:
 12 Q. And why are you sending this to this group of
 13 people?
 14 MS. MUNDON:
 15 A. I'm just copying the relevant people within
 16 both government and Eastern Health.
 17 CHAYTOR, Q.C.:
 18 Q. Okay. And why are you including Eastern
 19 Health's people at this point in time?
 20 MS. MUNDON:
 21 A. Just as a courtesy to let them know what the
 22 coverage was including.
 23 CHAYTOR, Q.C.:
 24 Q. Okay. Would you expect Ms. Bonnell to be
 25 doing that?

Page 233

1 MS. MUNDON:
 2 A. Yes, I'm sure she was doing her own media
 3 monitoring, but it was just a courtesy on my
 4 part at that time.
 5 CHAYTOR, Q.C.:
 6 Q. Okay. And had you done that previously?
 7 MS. MUNDON:
 8 A. On occasion I did, yes.
 9 CHAYTOR, Q.C.:
 10 Q. Okay. And you'll see in the story that's
 11 attached here, "Until now, however, Eastern
 12 Health, which operates hospitals and clinics
 13 at arms length from the Newfoundland and
 14 Labrador Government, had indicated that the
 15 test error rate was as low as 10 percent."
 16 And then Minister Wiseman e-mails you back and
 17 says, "Note the reference to arms length." I
 18 take it he means. And you reply, "I know.
 19 And how did both interviews go?" What was the
 20 significance of the comment, Eastern Health
 21 operating at arm's length?
 22 MS. MUNDON:
 23 A. I'm not sure exactly what Minister Wiseman
 24 meant by that. I guess you'd have to ask him
 25 what he -

Page 234

1 CHAYTOR, Q.C.:
 2 Q. Why would he be pointing that out to you?
 3 MS. MUNDON:
 4 A. Maybe because some people in the public
 5 wouldn't distinguish the difference between
 6 Eastern Health and the Department of Health.
 7 CHAYTOR, Q.C.:
 8 Q. Had you told the minister your concerns about
 9 being constantly and consistently reminded
 10 that Eastern Health operates at arms length?
 11 MS. MUNDON:
 12 A. I'm not sure if I would have talked to him
 13 about that at that point in time.
 14 CHAYTOR, Q.C.:
 15 Q. Okay. And you reply to the minister with "I
 16 know," but you don't know what he was talking
 17 about?
 18 MS. MUNDON:
 19 A. No, I say I know the reference that he's--he
 20 says, "Note the reference" so I looked down,
 21 "I know."
 22 CHAYTOR, Q.C.:
 23 Q. Yes. But you have no idea what the
 24 significance or what he was trying to point
 25 out to you?

Page 235

1 MS. MUNDON:
 2 A. I think he was just making the point that--and
 3 this was my understanding at the time, he was
 4 just making the point that the media had
 5 distinguished the fact that Eastern Health
 6 operates arms length from government, that
 7 they're two separate operations, when some
 8 people, you know, some media in the past may
 9 have covered it in a different way or some
 10 people in the public may not distinguish the
 11 difference.
 12 CHAYTOR, Q.C.:
 13 Q. Okay. And was that important to the
 14 department, to have that distinction drawn?
 15 MS. MUNDON:
 16 A. Well, I think at this point in time, given
 17 what had occurred with the file, in December,
 18 2006 and the fact that the department wasn't
 19 aware in December, 2006, not up to that point
 20 in time, that the information had not been
 21 disclosed, I think that would be an important
 22 point, yes.
 23 CHAYTOR, Q.C.:
 24 Q. Okay. So the department would want the public
 25 to be distinguishing the government from

Page 236

1 Eastern Health in this context?
 2 MS. MUNDON:
 3 A. Well, I think they would just want the public
 4 to understand how both work.
 5 CHAYTOR, Q.C.:
 6 Q. Okay. Had that been a consideration, had
 7 there been any thought given to, or given in
 8 the department to getting that message out
 9 there, that Eastern Health is arms length from
 10 the government?
 11 MS. MUNDON:
 12 A. No, there was no further discussion on that.
 13 I mean, at the end of the day -
 14 CHAYTOR, Q.C.:
 15 Q. No, but beforehand, before this went out, had
 16 -
 17 MS. MUNDON:
 18 A. No. I mean, bottom line is the minister would
 19 still recognize that he's accountable for
 20 health care in the province.
 21 CHAYTOR, Q.C.:
 22 Q. Yes.
 23 MS. MUNDON:
 24 A. But I think this was just, he was just making
 25 a comment, note that the media have referenced

1 arms length.
 2 CHAYTOR, Q.C.:
 3 Q. If we could have 0857, please? And this is an
 4 e-mail the next day, May 19th. And this seems
 5 to concern what type of review may take place
 6 regarding the issue. And there's an e-mail
 7 here from Ms. Hennessey to a number of people,
 8 including Mr. Thompson, and you're included,
 9 as well, in the e-mail. And Ms. Hennessey
 10 indicates, she says, "Robert, I think that
 11 government needs to take the time to assess
 12 the impacts of the type of review to be
 13 undertaken and the desired outcomes and not
 14 make a decision too quickly because the
 15 opposition is calling for a full judicial
 16 inquiry and some media are focused on who knew
 17 what when. The care of patients and restoring
 18 confidence in the health system should be the
 19 primary focus of any review." And you
 20 respond, you respond shortly thereafter with a
 21 comment that "I share Moira's views." What
 22 were your concerns?
 23 MS. MUNDON:
 24 A. I wouldn't say that I had a concern, because
 25 at the end of the day, I mean, I knew that

1 what and when," did you have--did you share
 2 that view with her?
 3 MS. MUNDON:
 4 A. No. I mean, in this--I think that that would
 5 be a question that would be answered in any
 6 type of review.
 7 CHAYTOR, Q.C.:
 8 Q. So what type of review or what was it that you
 9 were suggesting to Mr. Thompson?
 10 MS. MUNDON:
 11 A. I wasn't suggesting anything. This was on a
 12 Saturday, as you'll note, so I had looked at
 13 the e-mail on my Blackberry and had a quick
 14 look at it and said "yeah, I share Moira's
 15 views" and just send that quick.

1 people needed to get the answers and that I
 2 wanted the people to get the answers. I think
 3 I was just sharing her view here about taking
 4 the time before you do--you make any decision,
 5 you should take the time to analyze that
 6 decision.
 7 CHAYTOR, Q.C.:
 8 Q. And Ms. Hennessey, in saying that "the
 9 opposition is calling for a full judicial
 10 inquiry and some media are focused on who knew

1 CHAYTOR, Q.C.:
 2 Q. And that was it?
 3 MS. MUNDON:
 4 A. And that was it.
 5 CHAYTOR, Q.C.:
 6 Q. P-0209, please? And this is now the Monday,
 7 May 21st. It's an e-mail from Mr. Abbott to
 8 yourself in the morning at 10:18 a.m. "re:
 9 media coverage, ER/PR. For tomorrow's
 10 briefing of MHAS, what will be Eastern's
 11 messaging on what Government knew and when?
 12 Please call my cell. Thanks." And then you
 13 reply back at 10:41 a.m. "John, this was
 14 asked on Friday at the briefing, but I think
 15 you should have that discussion with George
 16 since he will be answering the question."
 17 Did you call Mr. Abbott and have a
 18 discussion with him around this?
 19 MS. MUNDON:
 20 A. No, I didn't. I just sent this e-mail.
 21 CHAYTOR, Q.C.:
 22 Q. What did you understand Mr. Abbott to be
 23 asking of you?
 24 MS. MUNDON:
 25 A. I think he was just looking for some further

Page 240

1 information on what Eastern Health would be
 2 saying in relation to that particular
 3 question.
 4 CHAYTOR, Q.C.:
 5 Q. And you indicate to him that it had been asked
 6 on Friday. So I take it at the media
 7 briefing?
 8 MS. MUNDON:
 9 A. Yes.
 10 CHAYTOR, Q.C.:
 11 Q. The question had come up what Government knew
 12 and when?
 13 MS. MUNDON:
 14 A. Yes.
 15 CHAYTOR, Q.C.:
 16 Q. Okay, and you were present when that question
 17 came up?
 18 MS. MUNDON:
 19 A. I believe so, yes.
 20 CHAYTOR, Q.C.:
 21 Q. And what was the answer at that time?
 22 MS. MUNDON:
 23 A. I think it was consistent with what the
 24 Department had already stated in terms of July
 25 2005 was when Minister Ottenheimer became

Page 241

1 aware of the issue, and then there was another
 2 briefing provided for Minister Osborne in the
 3 fall of 2006, and that Minister Wiseman--I
 4 can't recall what specifically would have been
 5 said about Minister Wiseman, but it would have
 6 been consistent with what has already been
 7 known by the Department.
 8 CHAYTOR, Q.C.:
 9 Q. And what does it mean, Ms. Mundon, when you
 10 say "what will Eastern's messaging be?" Like
 11 what does that, from a communications point of
 12 view, what does that mean?
 13 MS. MUNDON:
 14 A. I think he's just trying to ask me what--
 15 basically what are they going to say, you
 16 know, what is their response on what
 17 Government knew and when.
 18 CHAYTOR, Q.C.:
 19 Q. Okay, and what would--why would Government be
 20 asking that, in terms of Eastern's messaging?
 21 I mean, Government would know within itself
 22 what it knew and when it knew it. So why -
 23 MS. MUNDON:
 24 A. I wasn't really clear as to what Mr. Abbott
 25 was trying to find out here and that's why I

Page 242

1 suggested that he contact Mr. Tilley himself.
 2 CHAYTOR, Q.C.:
 3 Q. And do you know whether or not he did that?
 4 MS. MUNDON:
 5 A. I'm not aware if he did that or not.
 6 CHAYTOR, Q.C.:
 7 Q. Did you have any other conversations or
 8 discussions around this issue with anyone?
 9 MS. MUNDON:
 10 A. No, I didn't.
 11 CHAYTOR, Q.C.:
 12 Q. If we could have P-0869, please?
 13 MS. MUNDON:
 14 A. The same day at 11:32, the subject is
 15 tomorrow, so I take it that's the MHAS
 16 conference. You're e-mailing Ms. Bonnell.
 17 "Susan, need to talk to you to give you a
 18 heads up on something for tomorrow's briefing.
 19 Also, need to discuss another issue with you
 20 ASAP. Can you please give me a call today on
 21 my cell?" and she gets back to you and says
 22 that "sorry, I don't have your cell phone
 23 number. You can call mine," and she gives you
 24 her cell or her phone number. What was that
 25 all about? What did you have to give her a

Page 243

1 heads up on?
 2 MS. MUNDON:
 3 A. I think it may have been around the fact that
 4 some members of the public may be showing up
 5 at the briefing, as we had discussed in an
 6 earlier e-mail, and I just wanted to let her
 7 know that that could be happening, so that
 8 they could prepare, so be prepared for it so
 9 that they wouldn't turn anybody away.
 10 CHAYTOR, Q.C.:
 11 Q. And did you have a discussion then with Susan
 12 Bonnell about this?
 13 MS. MUNDON:
 14 A. No, other than just as I just said.
 15 CHAYTOR, Q.C.:
 16 Q. Why would you have--why couldn't you e-mail
 17 her that? Why couldn't you have just put in
 18 the e-mail that some members of the public may
 19 be showing up so make sure nobody's turned
 20 away? Why wouldn't you just e-mail her that?
 21 MS. MUNDON:
 22 A. It's a good question. I e-mail her almost
 23 everything else, certainly. I have no idea
 24 why I wouldn't have put it in an e-mail. I'm
 25 not sure.

Page 244

1 CHAYTOR, Q.C.:

2 Q. And "also need to discuss another issue with

3 you ASAP," what's that about?

4 MS. MUNDON:

5 A. I really can't remember, but I think it would

6 have been another issue outside of ER/PR.

7 CHAYTOR, Q.C.:

8 Q. Could it be the Burin radiology issue?

9 MS. MUNDON:

10 A. I'm just trying to determine now the time

11 lines, in terms of chronology, because there

12 would have--Burin radiology would have been

13 around the same time that the news release or

14 news conference was held to announce the

15 Commission of Inquiry.

16 CHAYTOR, Q.C.:

17 Q. So Ms. Mundon, this is the day before the MHA

18 briefing?

19 MS. MUNDON:

20 A. Yes.

21 CHAYTOR, Q.C.:

22 Q. You're asking--I take it that it's not usual

23 for you to be phoning or offering Ms. Bonnell

24 to phone you on your cell phone. What--but

25 you'd have no idea what it was that you needed

Page 245

1 to discuss with her other than it may be that

2 some members of the public might show up?

3 MS. MUNDON:

4 A. Actually, I'm just looking at the bottom of

5 this e-mail and it says sent by a Blackberry,

6 which would explain why I would ask her to

7 call my cell. I likely was not in the office

8 at that time, and instead of typing in the e-

9 mail in the Blackberry, which would take

10 forever, I just sent an e-mail and asked her

11 to call me on my cell.

12 CHAYTOR, Q.C.:

13 Q. So you typed those couple of sentences, but to

14 say the public may show up, you think that's

15 what this is about?

16 MS. MUNDON:

17 A. That's what I think, yes.

18 CHAYTOR, Q.C.:

19 Q. And did any members of the public show up?

20 MS. MUNDON:

21 A. I'm not aware if they did or not. I know

22 that, as I said earlier, that we would

23 certainly wouldn't turn--you know, wouldn't

24 want to turn any members of the public away.

25 CHAYTOR, Q.C.:

Page 246

1 Q. And how did you know that people from the

2 public were going, were thinking about coming?

3 MS. MUNDON:

4 A. There was just a question asked by one of the

5 MHAS on whether or not members of the public

6 would be invited, because they would want to

7 know that information, if people were calling

8 their offices, for example, and asking the

9 question.

10 CHAYTOR, Q.C.:

11 Q. So did the Department receive any contact from

12 members of the public around this time?

13 MS. MUNDON:

14 A. Not that I'm aware, no. I know that some

15 members of the public attended the media

16 briefing, because I was at the media briefing,

17 and there were some members of the public

18 there.

19 CHAYTOR, Q.C.:

20 Q. Yes, I guess that was open to the public?

21 MS. MUNDON:

22 A. Yes, it was.

23 CHAYTOR, Q.C.:

24 Q. If we could have P-0870, please? And this is

25 an e-mail exchange again between yourself and

Page 247

1 Ms. Bonnell, sent on your Blackberry at May

2 21st 2007, 3:34 p.m., and subject is "stats

3 from Friday. Susan, just noticed a small typo

4 in the document distributed on Friday. The

5 very last date should be February 2007, not

6 February 2006. Can we get this changed for

7 tomorrow's briefing?" and she tells you it's

8 done, and you say thanks. What was that

9 exchange about?

10 MS. MUNDON:

11 A. That was in the chronology that was

12 distributed at the media briefing and as it

13 was going along in chronological order, it was

14 just a typo. It was in the correct order. It

15 was just a typo. It said 2006 and it should

16 have said 2007, and I just wanted to make sure

17 that that correction was made.

18 CHAYTOR, Q.C.:

19 Q. So I take it that in terms of preparing for

20 this briefing with the MHAS, it's been left in

21 the hands of Eastern Health?

22 MS. MUNDON:

23 A. Yes.

24 CHAYTOR, Q.C.:

25 Q. And you're reviewing the documentation and

Page 248

1 providing input?

2 MS. MUNDON:

3 A. Well, it would have been the same

4 documentation that would have been provided to

5 the media.

6 CHAYTOR, Q.C.:

7 Q. And any changes though that you want done, you

8 had input into that?

9 MS. MUNDON:

10 A. But I didn't make any changes at that point in

11 time.

12 CHAYTOR, Q.C.:

13 Q. Other than this typo?

14 MS. MUNDON:

15 A. Other than the typo, yes.

16 CHAYTOR, Q.C.:

17 Q. Okay. If we could have, please, 1233? And

18 this is an e-mail from yourself to Mr. Tilley

19 and you've copied Ms. Bonnell, Mr. Abbott and

20 Ms. Hennessey on this, and subject is

21 "questions requiring response, May 21st at

22 3:50 p.m." and you write "George, as per

23 John's request," so I take it it wouldn't be

24 normal for you to be contacting the CEO with

25 questions to be answered?

Page 249

1 MS. MUNDON:

2 A. No, it wouldn't.

3 CHAYTOR, Q.C.:

4 Q. Okay. So "as per John's request, I am

5 forwarding these questions to you for response

6 ASAP tomorrow morning" and you say "will all

7 deceased's tests be retested? If so, has this

8 process started and what are the details?" and

9 the second question, or second point, "how

10 many of the deceased have been retested? The

11 Court affidavit states 103, but the statement

12 of statistics document released to media on

13 Friday states 105." So I take it that there's

14 been close reading and comparison of documents

15 now to note that the Court affidavit number is

16 somewhat different from what was released to

17 the media?

18 MS. MUNDON:

19 A. Yes.

20 CHAYTOR, Q.C.:

21 Q. Okay. Did you find that difference? Was that

22 your analysis that picked that up?

23 MS. MUNDON:

24 A. I don't think so, no.

25 CHAYTOR, Q.C.:

Page 250

1 Q. Okay. So Mr. Abbott asked you to send this?

2 MS. MUNDON:

3 A. Yes.

4 CHAYTOR, Q.C.:

5 Q. Why would he ask you to do that?

6 MS. MUNDON:

7 A. I'm not really sure.

8 CHAYTOR, Q.C.:

9 Q. Mr. Abbott was around, I take it?

10 MS. MUNDON:

11 A. Yes, he was.

12 CHAYTOR, Q.C.:

13 Q. Okay, but he asked you to send those

14 questions?

15 MS. MUNDON:

16 A. Yes.

17 CHAYTOR, Q.C.:

18 Q. But it wasn't you who came up with those

19 questions?

20 MS. MUNDON:

21 A. I may have come up with the questions after it

22 was discovered. He may have asked me to frame

23 some questions for his review before I had

24 sent it, but it wasn't my discovery. I didn't

25 discovery the inconsistency.

Page 251

1 CHAYTOR, Q.C.:

2 Q. And I take it then, Ms. Mundon, at this point

3 in time, you or, at least the Department,

4 someone in the Department, has a copy of the

5 affidavit?

6 MS. MUNDON:

7 A. Yes.

8 CHAYTOR, Q.C.:

9 Q. Did you have a copy of it?

10 MS. MUNDON:

11 A. At this point, I likely did.

12 CHAYTOR, Q.C.:

13 Q. Okay, and where did you get the affidavit?

14 MS. MUNDON:

15 A. It was forwarded to the Department by Eastern

16 Health upon request.

17 CHAYTOR, Q.C.:

18 Q. And do you know when that happened?

19 MS. MUNDON:

20 A. I would think it would be right around this

21 time, if that was when this was discovered,

22 this information, discrepancy was discovered.

23 CHAYTOR, Q.C.:

24 Q. And do you know who requested it and who the

25 affidavit was sent to?

Page 252

1 MS. MUNDON:
 2 A. I can't specifically recall. I think that Ms.
 3 Bonnell may have sent it to me. I'm not quite
 4 sure.
 5 CHAYTOR, Q.C.:
 6 Q. Okay. In reviewing the documents to come here
 7 today, did you find any e-mail or fax
 8 transmission in which that affidavit was sent
 9 to you?
 10 MS. MUNDON:
 11 A. Not that I know of, no.
 12 CHAYTOR, Q.C.:
 13 Q. Was the affidavit in the Department prior to
 14 May 2007?
 15 MS. MUNDON:
 16 A. I don't believe it was.
 17 CHAYTOR, Q.C.:
 18 Q. In asking the questions around "will all
 19 deceased's tests be retested? And how many of
 20 the deceased have been retested?" the issue of
 21 all the deceased being retested, you
 22 remembered Mr. Osborne requesting that that
 23 happen back in November of 2006?
 24 MS. MUNDON:
 25 A. Yes.

Page 253

1 CHAYTOR, Q.C.:
 2 Q. And it's now May of 2007. Did you have any
 3 discussion with Minister Wiseman and tell him
 4 that Minister Osborne, in fact, had been
 5 looking to have that happen back some six
 6 months ago?
 7 MS. MUNDON:
 8 A. It's very likely that I did. I certainly
 9 would have remembered that Minister Osborne
 10 asked for that to happen and I hadn't heard
 11 any update on that.
 12 CHAYTOR, Q.C.:
 13 Q. So I'm sorry, it was likely that you told that
 14 to Minister Wiseman?
 15 MS. MUNDON:
 16 A. It was likely, yes.
 17 CHAYTOR, Q.C.:
 18 Q. Do you know if you received a response to
 19 those questions?
 20 MS. MUNDON:
 21 A. I don't believe that I did, certainly not in
 22 writing. I'm not sure if Mr. Abbott received
 23 the response directly or not.
 24 CHAYTOR, Q.C.:
 25 Q. If we could have, please, P-0872? And Ms.

Page 254

1 Mundon, this is an e-mail from you to Mr.
 2 Abbott and Ms. Hennessey, May 21st 2007 at
 3 7:35 p.m. The subject is "draft key messages
 4 for your review." What were these key
 5 messages for?
 6 MS. MUNDON:
 7 A. These were drafted for inclusion as a
 8 backgrounder in the news release to announce
 9 the Commission of Inquiry.
 10 CHAYTOR, Q.C.:
 11 Q: And who asked you to do this?
 12 MS. MUNDON:
 13 A. I can't recall who asked me. I'm not sure if
 14 the Premier's office had asked for a
 15 backgrounder or if direction was given within
 16 the department.
 17 THE COMMISSIONER:
 18 Q: And I heard you say "I'm not sure if," and
 19 then I lost who -
 20 MS. MUNDON:
 21 A. The Premier's office.
 22 THE COMMISSIONER:
 23 Q: Okay.
 24 MS. MUNDON:
 25 A. I'm not sure if the Premier's office gave me

Page 255

1 direction or direction came from within the
 2 department.
 3 THE COMMISSIONER
 4 A. Thank you.
 5 CHAYTOR, Q.C.:
 6 Q. So either Ms. Matthews or someone with the
 7 department.
 8 MS. MUNDON:
 9 A. Yes.
 10 CHAYTOR, Q.C.:
 11 Q: And who in the department would give you
 12 direction?
 13 MR. MUNDON:
 14 A. Likely Mr. Abbott.
 15 CHAYTOR, Q.C.:
 16 Q: Okay. And what is the purpose of "key
 17 messages" in this context?
 18 MS. MUNDON:
 19 A. I think that there was a desire to have a
 20 backgrounder provided in the news release on
 21 announcing the Commission of Inquiry.
 22 CHAYTOR, Q.C.:
 23 Q: Okay. And desired by whom?
 24 MS. MUNDON:
 25 A. I believe, by Mr. Abbott.

Page 256

1 CHAYTOR, Q.C.:

2 Q: And for what purpose?

3 MS. MUNDON:

4 A. To provide some context and some background

5 information on the issue.

6 CHAYTOR, Q.C.:

7 Q: And where did you get the information that

8 you've included in the key messages?

9 MS. MUNDON:

10 A. I got the information from Eastern Health.

11 CHAYTOR, Q.C.:

12 Q: And given what you've said about the

13 deteriorating trust level with information

14 coming from Eastern Health, did you have any

15 concern in using Eastern Health as the source

16 of information for these key messages?

17 MS. MUNDON:

18 A. We didn't have any other source to rely on to

19 get information with respect to this issue.

20 They were the people managing the file and,

21 again, there was--I remember that Ms.

22 Hennessey had gone back and checked on these

23 points with them again just for additional

24 clarification to ensure that the information

25 was accurate, particularly on the patient

Page 257

1 notification piece.

2 CHAYTOR, Q.C.:

3 Q: Uh-hm. So what do you know about that? Who

4 did Ms. Hennessey speak with and what

5 questions did she ask?

6 MS. MUNDON:

7 A. It was either her or Mr. Abbott had talked

8 directly to Mr. Tilley and had asked this

9 question around what they had said in their

10 materials and in Mr. Tilley's speaking notes

11 with respect to contacting patients, and I'm

12 just highlighting it there now. They said

13 that they had contacted each patient who was

14 affected by the ER/PR test review, making sure

15 they received all the information and support

16 they required and that patients were told

17 either one of three things - that their tissue

18 had been retested and there was no change in

19 the original results, that their tissue had

20 been tested and that Eastern Health was

21 recommending a change in their treatment or

22 that, although there was a change from the

23 original test result, no change in treatment

24 was recommended.

25 CHAYTOR, Q.C.:

Page 258

1 Q: So Ms. Hennessey obtained that information

2 from Eastern Health.

3 MS. MUNDON:

4 A. This information was already in their

5 materials and in Mr. Tilley's speaking points

6 from both the briefing for the media and for

7 the MHA's, and Ms. Hennessey also verified--if

8 I can remember correctly, Ms. Hennessey or Mr.

9 Abbott went back to Eastern Health to again

10 confirm that this was accurate.

11 CHAYTOR, Q.C.:

12 Q: And they told you they had done that.

13 MS. MUNDON:

14 A. Yes.

15 CHAYTOR, Q.C.:

16 Q: Okay. Were you present when those discussions

17 took place?

18 MS. MUNDON:

19 A. No, I don't think I was.

20 CHAYTOR, Q.C.:

21 Q: Okay.

22 CHAYTOR, Q.C.:

23 Q: And in terms of not having any other source of

24 information on that other than Eastern Health,

25 if you had any doubt whatsoever in Eastern

Page 259

1 Health's information that was being provided

2 to you, how important was it to even bother

3 saying anything about patient contact? Why

4 not just leave it out?

5 MS. MUNDON:

6 A. Well, there was no doubt in my mind after the

7 information was again rechecked with them.

8 CHAYTOR, Q.C.:

9 Q: And why is that?

10 MS. MUNDON:

11 A. Because they had gone out--and I know that

12 they had in their media briefing that they had

13 in May of 2007, they certainly seemed to be

14 more organized with their thoughts and their

15 information at that time, and I think there

16 was--even though, overall, the trust may have

17 been deteriorating, I think that there was

18 some confidence that what they had been saying

19 in that media briefing and in the MHA briefing

20 and the information here had been checked and

21 rechecked to the point where the department

22 felt comfortable in using it at that time.

23 CHAYTOR, Q.C.:

24 Q: Checked and rechecked by asking Eastern

25 Health.

Page 260

1 MS. MUNDON:
 2 A. Yes.
 3 CHAYTOR, Q.C.:
 4 Q: Yes. Did you make any contact with any of the
 5 other health authorities?
 6 MS. MUNDON:
 7 A. Not that I recall, no.
 8 CHAYTOR, Q.C.:
 9 Q: Do you know whether anyone in the department
 10 did?
 11 MS. MUNDON:
 12 A. I'm not aware if they did or not.
 13 CHAYTOR, Q.C.:
 14 Q: And you would be aware because we've seen in
 15 the e-mails that you had some input into what
 16 type of review--I take it, you would be aware
 17 as to what the terms of reference for the
 18 inquiry would be, which would be going out
 19 along with the backgrounder. This
 20 backgrounder would be part of that.
 21 MS. MUNDON:
 22 A. I would certainly have been aware if there was
 23 a discussion from a communications perspective
 24 on the materials.
 25 CHAYTOR, Q.C.:

Page 261

1 Q: Uh-hm.
 2 MS. MUNDON:
 3 A. But not necessarily if there was another
 4 discussion.
 5 CHAYTOR, Q.C.:
 6 Q: And that at least two terms of reference for
 7 the inquiry include communications?
 8 MS. MUNDON:
 9 A. Yes.
 10 CHAYTOR, Q.C.:
 11 Q: Yes. Included in this "key messages," the
 12 bottom, is "Government believes there is no
 13 deliberate attempt to withhold information,
 14 and that Eastern Health's first priority was
 15 the patient. However, we also recognize the
 16 importance of understanding what happened and
 17 we are committed to undertaking a Commission
 18 of Inquiry to ensure that we get those
 19 answers." Now, Ms. Mundon, government
 20 believes there was "no deliberate attempt to
 21 withhold information." Was that your belief?
 22 MS. MUNDON:
 23 A. No.
 24 CHAYTOR, Q.C.:
 25 Q: So who drafted this portion of the "key

Page 262

1 messages?"
 2 MS. MUNDON:
 3 A. I probably would have drafted this, based
 4 again on information provided by Eastern
 5 Health and, again, I can't recall specifically
 6 at the time that this was drafted what the
 7 intention was in including that message.
 8 CHAYTOR, Q.C.:
 9 Q: The bullet immediately before that, "Eastern
 10 Health has implemented a number of measures to
 11 provide a high standard of ER/PR testing for
 12 new breast cancer patients, and these measures
 13 include," and then there's a list of things
 14 included.
 15 MS. MUNDON:
 16 A. Uh-hm.
 17 CHAYTOR, Q.C.:
 18 Q: Did you draft that?
 19 MS. MUNDON:
 20 A. I would have drafted that, based on again the
 21 information from Eastern Health.
 22 CHAYTOR, Q.C.:
 23 Q: Okay.
 24 MS. MUNDON:
 25 A. Contained in their own media briefing

Page 263

1 materials.
 2 CHAYTOR, Q.C.:
 3 Q: Did you at that point in time then in drafting
 4 it, other than the material that Eastern
 5 Health had put in the media briefing package,
 6 did you have any other documentation from
 7 Eastern Health at this point in time as to
 8 what measures may or may not have implemented?
 9 MS. MUNDON:
 10 A. No, I did not.
 11 CHAYTOR, Q.C.:
 12 Q: And we know later in the month in May there is
 13 a spreadsheet forwarded over to the
 14 department.
 15 MS. MUNDON:
 16 A. Yes.
 17 CHAYTOR, Q.C.:
 18 Q: And I believe to your attention. You did not
 19 have in your possession at the time?
 20 MS. MUNDON:
 21 A. No, I did not.
 22 CHAYTOR, Q.C.:
 23 Q: And did you ask for any documentation which
 24 would support that statement prior to having
 25 this release as a backgrounder.

Page 264

1 MS. MUNDON:
 2 A. No, I did not because, again, I wasn't--I was
 3 using information that they had provided in a
 4 public domain and trusted that the information
 5 that they had provided was accurate, and I was
 6 also sending it to both Mr. Abbott and Ms.
 7 Hennessey for verification and view and
 8 approval.
 9 CHAYTOR, Q.C.:
 10 Q: And this refers to a total of nine hundred and
 11 thirty-nine patients, and then there's a
 12 number other patients. Seven hundred and
 13 sixty-three patients having being reviewed.
 14 Three hundred and seventeen patients had a
 15 change in result, and a hundred and seventeen
 16 had a resulting change in treatment. Other
 17 than the document of November 23rd, which
 18 would have been in the department's
 19 possession, the briefing note from Eastern
 20 Health and the materials from Eastern Health
 21 in the media briefing -
 22 MS. MUNDON:
 23 A. Uh-hm.
 24 CHAYTOR, Q.C.:
 25 Q: Did you have any other documents which would

Page 265

1 support the numbers that are referred to?
 2 MS. MUNDON:
 3 A. No, I would not.
 4 CHAYTOR, Q.C.:
 5 Q: If we could look, please, at P-0875 and, Ms.
 6 Mundon, this is from yourself to Sandra
 7 Barnes, Don Burrage, Josephine Cheeseman,
 8 Brian Crawley, Elizabeth Matthews, Andrea
 9 Nolan and Robert Thompson, May 22, 2007, and
 10 the subject is "Draft news release attached
 11 and pasted below. Speaking notes and Q&A's
 12 are to follow." And this is the draft news
 13 release of government to undertake a
 14 Commission of Inquiry on the Estrogen and
 15 Progesterone Receptor testing for breast
 16 cancer patients. You drafted this, I take it?
 17 MS. MUNDON:
 18 A. Yes.
 19 CHAYTOR, Q.C.:
 20 Q: Okay. And who would have asked you to draft
 21 the news release?
 22 MS. MUNDON:
 23 A. I believe the Premier's office asked me to
 24 draft it.
 25 CHAYTOR, Q.C.:

Page 266

1 Q: Okay. And then, I take it, you solicited the
 2 input of the other individuals named here.
 3 MS. MUNDON:
 4 A. Yes.
 5 CHAYTOR, Q.C.:
 6 Q: Did you also have any input from anyone within
 7 the Department of Health?
 8 MS. MUNDON:
 9 A. Yes, the Deputy Minister and the Assistant
 10 Deputy Minister along with the Minister.
 11 CHAYTOR, Q.C.:
 12 Q: Okay.
 13 THE COMMISSIONER:
 14 Q: Did you say "and the Minister?"
 15 MS. MUNDON:
 16 A. Yes.
 17 THE COMMISSIONER:
 18 Q: Thank you.
 19 MS. MUNDON:
 20 A. This would have been reviewed and approved at
 21 the departmental level before I had sent it to
 22 these additional individuals for their review
 23 and approval.
 24 CHAYTOR, Q.C.:
 25 Q: So it would have, what, done within the

Page 267

1 department first.
 2 MS. MUNDON:
 3 A. Yes.
 4 CHAYTOR, Q.C.:
 5 Q: And then sent on.
 6 MS. MUNDON:
 7 A. Yes.
 8 CHAYTOR, Q.C.:
 9 Q: Okay. And if we could look then, please, at
 10 P-0876? Mr. Thompson replies to you and says
 11 that he has no issues with the news release
 12 and only one comment. He's not sure why we
 13 are mentioning Tilley's apology because the
 14 communications issue is just one of the
 15 inquiry issues, not the sole focus, and your
 16 response is, "John wanted the apology
 17 reference to put the issue in context." What
 18 do you remember about that? I take it, Mr.
 19 Abbott wanted the apology referenced?
 20 MS. MUNDON:
 21 A. Yes.
 22 CHAYTOR, Q.C.:
 23 Q: Okay. And what discussion did you have with
 24 Mr. Abbott around that? Why was that
 25 important to him to have referenced?

Page 268

1 MS. MUNDON:
 2 A. I think he had indicated at the time that he
 3 wanted to include the fact that Mr. Tilley had
 4 acknowledged that they could have handled the
 5 issue differently.
 6 CHAYTOR, Q.C.:
 7 Q: And why in the context of this going out as a
 8 news release, setting up the--or announcing
 9 the Commission of Inquiry, why would that be
 10 important for Mr. - why was he suggesting that
 11 be included?
 12 MS. MUNDON:
 13 A. I'm not quite sure. I didn't really ask him a
 14 lot of questions on it. I was given direction
 15 to include and I did so.
 16 CHAYTOR, Q.C.:
 17 Q: Okay. And from a communications point of
 18 view, you didn't give any advice to the
 19 contrary.
 20 MS. MUNDON:
 21 A. Not when the Deputy Minister, who was my
 22 supervisor, gives me direction on doing
 23 something, no.
 24 CHAYTOR, Q.C.:
 25 Q: So even if it's a communications issue, if

Page 269

1 your Deputy tells you to do it, you just do
 2 it?
 3 MS. MUNDON:
 4 A. Well, I mean, if I had strong opposition to
 5 something, I would voice my concern.
 6 CHAYTOR, Q.C.:
 7 Q: Yes.
 8 MS. MUNDON:
 9 A. But at the end of the day then I would follow
 10 direction.
 11 CHAYTOR, Q.C.:
 12 Q: Okay. And P-0850, please, and it's an e-mail
 13 back from Ms. Matthews and she's questioning--
 14 she's noting that she had a couple of comments
 15 in her original e-mail, and she's also saying
 16 "There's no further quote from the Minister,
 17 and did Eastern Health indeed contact all of
 18 those patients directly because this is
 19 contrary to what we were told. Can someone
 20 please clarify?" So Ms. Matthews is
 21 questioning whether, in fact, the patients
 22 were contacted directly, which is what the
 23 original draft said.
 24 MS. MUNDON:
 25 A. Yes.

Page 270

1 CHAYTOR, Q.C.:
 2 Q: And she indicates "this is contrary to what we
 3 were told."
 4 MS. MUNDON:
 5 A. Yes.
 6 CHAYTOR, Q.C.:
 7 Q: So what did you understand? In drafting the
 8 news release, how did you understand the
 9 patients had been contacted?
 10 MS. MUNDON:
 11 A. I can't specifically remember now how I had
 12 heard, but I think my initial understanding
 13 was that they had been contacted through their
 14 physician instead of directly. However, in
 15 Mr. Tilley's speaking points, it's clear when
 16 he outlines how that all patients were
 17 contacted and how they were contacted. So,
 18 again, at this point, I recall Mr. Abbott
 19 contacting--calling Mr. Tilley - and I
 20 remember being in his office at the time - and
 21 checking on this fact yet again.
 22 CHAYTOR, Q.C.:
 23 Q: And you were in the office when that phone
 24 call happened.
 25 MS. MUNDON:

Page 271

1 A. Yes.
 2 CHAYTOR, Q.C.:
 3 Q: And this is before the announcement for the
 4 inquiry goes out?
 5 MS. MUNDON:
 6 A. Yes.
 7 CHAYTOR, Q.C.:
 8 Q: Okay. And what was said in that? Was he on
 9 the speaker phone? Could you hear what Mr.
 10 Tilley was saying?
 11 MS. MUNDON:
 12 A. I don't think he was on the speaker phone, no.
 13 I just recall Mr. Abbott asking him again to
 14 ensure--to check on the fact within the
 15 organization regarding patient notification
 16 and to confirm that this was accurate, what he
 17 had included in the media briefing and in the
 18 speaking notes that day.
 19 CHAYTOR, Q.C.:
 20 Q: Okay. And so reassurance was given that it
 21 was accurate, I take it.
 22 MS. MUNDON:
 23 A. The phone call ended and Mr. Tilley went to
 24 talk to someone within the organization, and
 25 it's my understanding that he called Mr.

Page 272

1 Abbott back and Mr. Abbott told me that Mr.
 2 Tilley had verified that the information was
 3 accurate.
 4 CHAYTOR, Q.C.:
 5 Q: Okay. And can we look at, please, P-0850?
 6 And do you know who within Eastern Health Mr.
 7 Tilley received that verification from?
 8 MS. MUNDON:
 9 A. No, I'm not sure who he would have received
 10 that from.
 11 CHAYTOR, Q.C.:
 12 Q: So P-0850? Okay, I think that's the one we
 13 just had up, I'm sorry. It's P-0882. And
 14 you're sending back to the same group of
 15 people on May 22nd around noon the latest
 16 version with the suggested changes, and you'll
 17 see in here the change regarding patient
 18 contact. See, here it now says "Eastern
 19 Health contacted each patient who was affected
 20 by the ER/PR test review or the family
 21 physician to make sure they received all the
 22 information and support they required, and
 23 they were told one of three things."
 24 MS. MUNDON:
 25 A. Yes.

Page 273

1 CHAYTOR, Q.C.:
 2 Q: Was that consistent with what had been told at
 3 the news conference then, or was that the--or
 4 the family physician had it afterwards?
 5 MS. MUNDON:
 6 A. I'm not quite sure. I'd have to go back and
 7 check the materials.
 8 CHAYTOR, Q.C.:
 9 Q: Okay. If we could look, please, at P-0128,
 10 Page 44, and this is the news release then
 11 that goes out.
 12 MS. MUNDON:
 13 A. Uh-hm.
 14 CHAYTOR, Q.C.:
 15 Q: And the backgrounder. And it appears to be
 16 the same as what your final draft--or the
 17 final version we just looked at.
 18 MS. MUNDON:
 19 A. Yes.
 20 CHAYTOR, Q.C.:
 21 Q: So there are no further changes, I take it,
 22 after that. Other than the call back to
 23 Eastern Health on the point of were all the
 24 patients contacted and, if so, how--other than
 25 that, were any other inquiries made of Eastern

Page 274

1 Health prior to sending this out?
 2 MS. MUNDON:
 3 A. I didn't make any myself, but I'm not aware if
 4 anybody would have made any inquiries.
 5 CHAYTOR, Q.C.:
 6 Q: Was this sent to Eastern Health for their
 7 review prior to it being sent out?
 8 MS. MUNDON:
 9 A. Not that I'm aware of. Again, the information
 10 would have been taken directly from materials
 11 that they already provided to us.
 12 CHAYTOR, Q.C.:
 13 Q: If we could have P-0880, please. And did you
 14 have, other than the e-mail exchange with
 15 Elizabeth Matthews where she's saying that
 16 it's contrary to what you understood, or the
 17 government understood, that all patients had
 18 been directly contacted, did you have any
 19 discussions with Ms. Matthews around that?
 20 MS. MUNDON:
 21 A. No, I don't recall having any discussions with
 22 her.
 23 CHAYTOR, Q.C.:
 24 Q: And do you recall Ms. Matthews challenging the
 25 information that was in the backgrounder and

Page 275

1 wanting to make sure that it was one hundred
 2 percent accurate?
 3 MS. MUNDON:
 4 A. She certainly would want to make sure that the
 5 information was one hundred percent accurate,
 6 yes.
 7 CHAYTOR, Q.C.:
 8 Q: Do you recall then any discussions with her
 9 around the information in the backgrounder and
 10 any reassurances you may have given regarding
 11 the information?
 12 MS. MUNDON:
 13 A. I would have likely told her that, again, what
 14 I've just said, that the information was taken
 15 from material that Eastern Health provided in
 16 the media, that I had sent the information to
 17 the Assistant Deputy Minister and the Deputy
 18 Minister for their review and approval.
 19 CHAYTOR, Q.C.:
 20 Q: If we could look then at P-0880, is an e-mail
 21 from yourself to the same group of people:
 22 Mr. Crawley, Ms. Matthews, Mr. Thompson, and
 23 others. And it's draft Q and A's for review.
 24 And then there's a page and a bit, a list of
 25 questions and answers. What was the purpose

Page 276

1 of this document?

2 MS. MUNDON:

3 A. It's just a document that would be prepared

4 for the Minister in responding or whoever the

5 spokesperson would be in responding to

6 questions from the media.

7 CHAYTOR, Q.C.:

8 Q. And who asked you to prepare this?

9 MS. MUNDON:

10 A. I can't specifically recall if somebody would

11 have asked me to prepare it or if I would have

12 prepared it on my own.

13 CHAYTOR, Q.C.:

14 Q. And why would it be going to people in the

15 Premier's office?

16 MS. MUNDON:

17 A. To ensure that they were aware of this and to

18 review and approve it.

19 CHAYTOR, Q.C.:

20 Q. Now it's copied to people in your department,

21 Ms. Hennessey and Mr. Abbott -

22 MS. MUNDON:

23 A. Yes.

24 CHAYTOR, Q.C.:

25 Q. But it's actually sent to the people in the

Page 277

1 Premier's office.

2 MS. MUNDON:

3 A. I would have received review and approval from

4 within the department before sending on to

5 these additional people.

6 CHAYTOR, Q.C.:

7 Q. So was it within your department that you were

8 asked to do this or did the Premier's office

9 ask you to do this?

10 MS. MUNDON:

11 A. I can't specifically remember.

12 CHAYTOR, Q.C.:

13 Q. If we could look at, please, P0886? And this

14 is an e-mail exchange with Jeanette O'Keefe

15 and Ms. O'Keefe is at Eastern Health. What

16 position does Ms. O'Keefe have at Eastern

17 Health?

18 MS. MUNDON:

19 A. I'm not sure of what her exact title is, but

20 she would be in a communications specialist

21 role assisting the director.

22 CHAYTOR, Q.C.:

23 Q. Okay, and it appears that this is on May 23rd,

24 2007 and you're trying to find out the exact

25 date of when the attached ad ran in the

Page 278

1 newspapers. What's that all about? I'm

2 sorry, it's from Ms. O'Keefe to yourself. "Hi

3 Tansy, here's the advertisement. I'm in the

4 process of determining the exact date when the

5 ad ran." So I take it you posed that question

6 of Ms. O'Keefe?

7 MS. MUNDON:

8 A. Yes.

9 CHAYTOR, Q.C.:

10 Q. And here's the ad. So what's that all about?

11 MS. MUNDON:

12 A. I can't recall specifically how I came about

13 to ask her for this.

14 CHAYTOR, Q.C.:

15 Q. I take it somebody would have asked you to

16 make that inquiry?

17 MS. MUNDON:

18 A. Possibly, yes.

19 CHAYTOR, Q.C.:

20 Q. And you have no recollection as to who asked

21 you to do that or why you were making this

22 inquiry?

23 MS. MUNDON:

24 A. No, I don't.

25 CHAYTOR, Q.C.:

Page 279

1 Q. Was there anything about the ad that was of

2 concern to the department or to the

3 government?

4 MS. MUNDON:

5 A. I would think it would be around patient

6 notification piece being -

7 CHAYTOR, Q.C.:

8 Q. And this is May 23rd.

9 MS. MUNDON:

10 A. Yes.

11 CHAYTOR, Q.C.:

12 Q. So you think there were concerns in the

13 department or government at that point in time

14 as to patient notification?

15 MS. MUNDON:

16 A. I don't know if they were concerns or if we

17 just wanted to verify what was said in their

18 public ad regarding patient notification.

19 CHAYTOR, Q.C.:

20 Q. Well what it says here is that "all patients

21 who are being retested are being contacted.

22 Our first priority is to notify patients whose

23 results have changed. If there is no change

24 and the result of your treatment is affected,

25 you will be contacted directly by your

Page 280

1 oncologist or treating physician. You will
 2 also be notified if there is no change in your
 3 ER and PR status."
 4 MS. MUNDON:
 5 A. Yes.
 6 CHAYTOR, Q.C.:
 7 Q. "It is important to note that most patients
 8 will not experience a change in their earlier
 9 test results." And that seems to be it in
 10 terms of patient contact and then there's also
 11 a number for the patient relations officer
 12 given. So you have no recollection around
 13 this and why you would be inquiring as to when
 14 this ad ran?
 15 MS. MUNDON:
 16 A. No, I don't.
 17 CHAYTOR, Q.C.:
 18 Q. Do you recall getting an answer back
 19 eventually from Ms. O'Keefe on the issue?
 20 MS. MUNDON:
 21 A. I'm not sure if she--I think she did get back
 22 to me.
 23 CHAYTOR, Q.C.:
 24 Q. If we could have P-0887 please?
 25 REGISTRAR:

Page 281

1 Q. What was that number again, Ms. Chaytor? 887?
 2 CHAYTOR, Q.C.:
 3 Q. Looks like it's a cancelled exhibit. Okay,
 4 let's try P-1416. And page 39, please? And
 5 this is in response back to you on the same
 6 day at 11:13, so about 15 minutes after the
 7 first e-mail where Ms. O'Keefe says she's not
 8 exactly sure--"not sure exactly when this ad
 9 ran, but it was sent to The Telegram and
 10 various other newspapers on Thursday, October
 11 20th. I'm assuming the ad ran that following
 12 Saturday, but can't be certain." So she's
 13 telling you when the ad was sent to the
 14 various media.
 15 MS. MUNDON:
 16 A. Uh-hm.
 17 CHAYTOR, Q.C.:
 18 Q. That doesn't jog your memory any?
 19 MS. MUNDON:
 20 A. No, it doesn't.
 21 CHAYTOR, Q.C.:
 22 Q. P-0457 please? And Ms. Bonnell this is an e-
 23 mail exchange from Mr. Tilley to Mr. Abbott
 24 and to yourself, the next day, May 24th, and
 25 it's copied to Ms. Bonnell and it's regarding

Page 282

1 the Globe & Mail letter and Mr. Tilley writes,
 2 "Tansy, this is the latest draft of our letter
 3 to the Globe. We will finalize in the a.m."
 4 George. Did you, Ms. Mundon, did you draft
 5 the letter to the Globe & Mail that went from
 6 the department?
 7 MS. MUNDON:
 8 A. From the department or--there were two
 9 letters, one was from Eastern Health and one
 10 was from the department.
 11 CHAYTOR, Q.C.:
 12 Q. Yes, well I assume you didn't draft Eastern
 13 Health's, did you?
 14 MS. MUNDON:
 15 A. No, I drafted one for the department.
 16 CHAYTOR, Q.C.:
 17 Q. You drafted one for the department, okay. So
 18 what was your involvement in that, why was the
 19 letter felt to be necessary? Whose idea was
 20 the letter and why was it felt to be
 21 necessary?
 22 MS. MUNDON:
 23 A. There was an article, as I recall in the Globe
 24 & Mail which had some inaccurate facts in
 25 there and so, Eastern Health was preparing a

Page 283

1 response and the department also prepared a
 2 response to address that.
 3 CHAYTOR, Q.C.:
 4 Q. And so did you co-ordinate that with Eastern
 5 Health, what your response would be?
 6 MS. MUNDON:
 7 A. Yes.
 8 CHAYTOR, Q.C.:
 9 Q. And why was that?
 10 MS. MUNDON:
 11 A. I can't recall specifically why now, other
 12 than the fact that they would be sending a
 13 letter and we would be sending a letter and we
 14 wouldn't want to have repetitive messaging in
 15 both letters, in terms of like duplicate
 16 letters being sent.
 17 CHAYTOR, Q.C.:
 18 Q. And what does repetitive messaging mean?
 19 MS. MUNDON:
 20 A. Just that, you know, we wouldn't want to have
 21 a letter where both of us are saying the exact
 22 same things in each separate letter.
 23 CHAYTOR, Q.C.:
 24 Q. So in sending this letter you're trying to get
 25 a message out?

Page 284

1 MS. MUNDON:
 2 A. Yes.
 3 CHAYTOR, Q.C.:
 4 Q. And what was the message?
 5 MS. MUNDON:
 6 A. I can't recall now what the message was
 7 without looking at the letter, but I know that
 8 our letter did not get published at the end of
 9 the day; Eastern Health's letter did.
 10 CHAYTOR, Q.C.:
 11 Q. Did any portion of your letter get published?
 12 MS. MUNDON:
 13 A. Not that I'm aware of.
 14 CHAYTOR, Q.C.:
 15 Q. If we could try P-0458 please? And this is
 16 the latest draft of the letter, you're
 17 indicating. "Since Elizabeth is okay with us
 18 sending tomorrow, rather than tonight, I will
 19 contact the Globe to see if we can get
 20 permission to submit a letter of this length.
 21 If not, I will have to cut it significantly,
 22 otherwise she is fine with it." So I take it
 23 that's Elizabeth Matthews?
 24 MS. MUNDON:
 25 A. Yes.

Page 285

1 CHAYTOR, Q.C.:
 2 Q. And she approved of the letter before it went?
 3 MS. MUNDON:
 4 A. Yes.
 5 CHAYTOR, Q.C.:
 6 Q. And this letter did get submitted but to your
 7 knowledge it wasn't published?
 8 MS. MUNDON:
 9 A. Yes.
 10 CHAYTOR, Q.C.:
 11 Q. If we could look at P-0460 please? You
 12 respond to Mr. Tilley, "Thanks George, we will
 13 tweak our letter in the morning to ensure we
 14 don't have repetitive messaging." So there's
 15 that phrase "repetitive messaging". So you're
 16 trying to, I take it, get out a message that
 17 would not necessarily be duplicating what
 18 Eastern Health is saying?
 19 MS. MUNDON:
 20 A. Yes.
 21 CHAYTOR, Q.C.:
 22 Q. If we could have, please, P-1614? Is there
 23 anything else about that letter that you
 24 recall?
 25 MS. MUNDON:

Page 286

1 A. No, not specifically, no.
 2 CHAYTOR, Q.C.:
 3 Q. Actually, I'm sorry, it's not P-1614--yes, it
 4 is, sorry, P-1614.
 5 THE COMMISSIONER:
 6 Q. Ms. Chaytor, we'll take the afternoon break
 7 when you find a spot.
 8 CHAYTOR, Q.C.:
 9 Q. Thank you. And this is an e-mail that was
 10 sent from a Cathy White to Doug Letto. And
 11 then you send it on to--it's from Elizabeth
 12 Matthews to yourself and she indicates this
 13 may become an issue. And then you send it on
 14 to Ms. Bonnell. "FYI". What was your purpose
 15 in sending that on to Ms. Bonnell?
 16 MS. MUNDON:
 17 A. The e-mail had been on the newscast, under
 18 "Feedback" so it was public knowledge, so I
 19 just wanted to make Ms. Bonnell aware of this.
 20 CHAYTOR, Q.C.:
 21 Q. Okay, and this person is, I take it, the
 22 former director of communications?
 23 MS. MUNDON:
 24 A. Yes.
 25 CHAYTOR, Q.C.:

Page 287

1 Q. So this is the person who would have held Ms.
 2 Bonnell's position previously.
 3 MS. MUNDON:
 4 A. Yes.
 5 CHAYTOR, Q.C.:
 6 Q. And you picked this up, did you, on the--is
 7 that how you became aware of it?
 8 MS. MUNDON:
 9 A. No, I did pick it up after the fact. It was
 10 sent to me by Ms. Matthews but before I sent
 11 it to Ms. Bonnell, I had checked to see if it
 12 had already been included on "Feedback" I
 13 think before it was even sent to Ms. Matthews.
 14 CHAYTOR, Q.C.:
 15 Q. And then Ms. Matthews sends it to you, by the
 16 look of this, and then you send it on to Ms.
 17 Bonnell?
 18 MS. MUNDON:
 19 A. Yes.
 20 CHAYTOR, Q.C.:
 21 Q. Did you have any response from Ms. Bonnell
 22 around this?
 23 MS. MUNDON:
 24 A. No, I did not.
 25 CHAYTOR, Q.C.:

Page 288

1 Q. Ms. Mundon in the letter that went to the
 2 Globe & Mail, was there any acknowledgement or
 3 reference in the letter by the department that
 4 Eastern Health had not spoken to the issue for
 5 almost a year, except for the statement that
 6 went to The Current, that Eastern Health had
 7 not spoken to the media for a period of time?
 8 MS. MUNDON:
 9 A. I don't recall that being part of the letter,
 10 no.
 11 CHAYTOR, Q.C.:
 12 Q. And why not?
 13 MS. MUNDON:
 14 A. I don't recall why it was or wasn't in there.
 15 CHAYTOR, Q.C.:
 16 Q. Commissioner, this would be a good point to
 17 break.
 18 THE COMMISSIONER:
 19 Q. All right, we'll take the afternoon break.
 20 (RECESS)
 21 THE COMMISSIONER:
 22 Q. Please be seated. Ms. Chaytor?
 23 CHAYTOR, Q.C.:
 24 Q. Thank you, Commissioner. Ms. Mundon, there
 25 was a conference call on May 24th, 2007

Page 289

1 involving the health authorities across the
 2 province. Were you involved in that
 3 conference call?
 4 MS. MUNDON:
 5 A. Would that be the call with the directors or -
 6 CHAYTOR, Q.C.:
 7 Q. Yes, with the VP Medical.
 8 MS. MUNDON:
 9 A. Yes.
 10 CHAYTOR, Q.C.:
 11 Q. Yes, you were on that call, were you?
 12 MS. MUNDON:
 13 A. Yes.
 14 CHAYTOR, Q.C.:
 15 Q. What happened on that telephone call? What
 16 was discussed?
 17 MS. MUNDON:
 18 A. If I can remember correctly there was a
 19 discussion around ER/PR testing in the other
 20 health authorities and it was brought up the
 21 fact that testing had not resumed at Eastern
 22 Health or the other three health authorities
 23 that Eastern Health was only retesting its own
 24 test results at that point in time.
 25 CHAYTOR, Q.C.:

Page 290

1 Q. Okay, and do you know why other regions were
 2 continuing, I believe they were sending their
 3 samples to Mount Sinai. Do you know why they
 4 were continuing to do that, rather than use
 5 St. John's?
 6 MS. MUNDON:
 7 A. It was my understanding that St. John's wanted
 8 to ensure that they had a comfort level with
 9 the accuracy of their own results before they
 10 undertook to take the results from other
 11 jurisdictions again.
 12 CHAYTOR, Q.C.:
 13 Q. And is that what was discussed on the call
 14 that day?
 15 MS. MUNDON:
 16 A. That was certainly one of the main things that
 17 was discussed in the call, yes.
 18 CHAYTOR, Q.C.:
 19 Q. And was there any concerns voiced by the
 20 physicians from the other health authorities,
 21 other than Eastern Health, was there any
 22 concern voiced by them regarding the ER/PR
 23 issue and their knowledge of what had gone
 24 wrong to cause the problems with the tests in
 25 the first place?

Page 291

1 MS. MUNDON:
 2 A. I can't recall all the details on that
 3 conversation, but I think there was some
 4 discussion around inconsistency from one lab
 5 or authority to the other and how the stain
 6 was tested and there were some concerns about
 7 that.
 8 THE COMMISSIONER:
 9 Q. I'm sorry, inconsistency of what?
 10 MS. MUNDON:
 11 A. How the stain was--how the test was undertaken
 12 in one authority verses another. If it was
 13 consistent all around the province, the way
 14 that the test was done.
 15 THE COMMISSIONER:
 16 Q. Who brought that up?
 17 MS. MUNDON:
 18 A. It was one of the directors, I think one of
 19 Medical or one of the people in charge of the
 20 lab, I can't recall who specifically would
 21 have said that?
 22 CHAYTOR, Q.C.:
 23 Q. Did you understand that the only staining
 24 would happen in St. John's? Did you
 25 understand that the lab was here, the IHC lab

Page 292

1 was in St. John's, so the staining would take
 2 place here?
 3 MS. MUNDON:
 4 A. Yes, sorry, not the staining, the way that the
 5 tissue was put on the actual slide.
 6 CHAYTOR, Q.C.:
 7 Q. So the fixation of the tissue?
 8 MS. MUNDON:
 9 A. Yes, the fixation, exactly.
 10 CHAYTOR, Q.C.:
 11 Q. So somebody brought up an issue regarding
 12 fixation of the tissue?
 13 MS. MUNDON:
 14 A. Yes.
 15 CHAYTOR, Q.C.:
 16 Q. And what did you understand was the concern
 17 around that?
 18 MS. MUNDON:
 19 A. Just whether or not there were consistent
 20 standards from a provincial perspective on how
 21 that was done.
 22 CHAYTOR, Q.C.:
 23 Q. And that was one of the physicians outside of
 24 Eastern Health bringing up that issue?
 25 MS. MUNDON:

Page 293

1 A. Yes.
 2 CHAYTOR, Q.C.:
 3 Q. And was there any concern expressed by anyone
 4 that they were unaware that fixation was an
 5 issue up until very recently?
 6 MS. MUNDON:
 7 A. I can't recall if that was discussed.
 8 CHAYTOR, Q.C.:
 9 Q. Is there anything else about the phone call
 10 that you recall?
 11 MS. MUNDON:
 12 A. No, again I would just be an observer for the
 13 most part in that call.
 14 CHAYTOR, Q.C.:
 15 Q. And the physician comment that you do recall,
 16 was that physician voicing concern about there
 17 not being a standard within his particular
 18 region or that the standard just wasn't the
 19 same across the province? What exactly was -
 20 MS. MUNDON:
 21 A. I think it was a provincial standard, the lack
 22 of a provincial standard.
 23 CHAYTOR, Q.C.:
 24 Q. And he was looking to have that happen, is
 25 that it?

Page 294

1 MS. MUNDON:
 2 A. I think so, yes.
 3 CHAYTOR, Q.C.:
 4 Q. And was that somehow a factor in his or his
 5 health authority's decision not to send the
 6 samples to St. John's?
 7 MS. MUNDON:
 8 A. They may have been, yes.
 9 CHAYTOR, Q.C.:
 10 Q. If we could have, please, P-1615? And this is
 11 an e-mail of May 31st, 2007 to Ms. Bonnell and
 12 you've copied Ms. O'Keefe from yourself, "Left
 13 a message with Elizabeth for you. CBC only
 14 had memo, can you please e-mail key messages
 15 once they are done so the Minister has a
 16 copy." Now what's this about?
 17 MS. MUNDON:
 18 A. I think this is about the Doctor Ejeckam memo.
 19 My first recollection of that was in the House
 20 of Assembly and perhaps on this very day, I
 21 recall the Premier referencing it and holding
 22 up a memo from Dr. Ejeckam dated back to 2003
 23 in response to a question in the House of
 24 Assembly.
 25 CHAYTOR, Q.C.:

Page 295

1 Q. And had you seen this memo prior to the
 2 Premier using it in the House?
 3 MS. MUNDON:
 4 A. No, I did not.
 5 CHAYTOR, Q.C.:
 6 Q. You hadn't seen it before that?
 7 MS. MUNDON:
 8 A. No.
 9 CHAYTOR, Q.C.:
 10 Q. And do you have any knowledge as to how the
 11 Premier obtained the memo?
 12 MS. MUNDON:
 13 A. I would assume the Minister would have given
 14 it to him.
 15 CHAYTOR, Q.C.:
 16 Q. I'm sorry?
 17 MS. MUNDON:
 18 A. I'm assuming that the Minister would have
 19 given him a copy.
 20 CHAYTOR, Q.C.:
 21 Q. Okay, and how did the Minister get the copy?
 22 MS. MUNDON:
 23 A. I'm not sure.
 24 CHAYTOR, Q.C.:
 25 Q. And if we could look, please, at P-1262? This

Page 296

1 is a fax transmission to yourself from Eastern
 2 Health on that date and the fax transmission
 3 appears to be 2:00 in the afternoon, your e-
 4 mail to Ms. Bonnell had been at 1:05.
 5 MS. MUNDON:
 6 A. Yes.
 7 CHAYTOR, Q.C.:
 8 Q. And this contains a number of documents.
 9 MS. MUNDON:
 10 A. Uh-hm.
 11 CHAYTOR, Q.C.:
 12 Q. How did this come to be forwarded to you? It
 13 includes, it appears, all of Dr. Ejeckam's
 14 memos, as well as the minutes of the Surgical
 15 Pathology Review Committee?
 16 MS. MUNDON:
 17 A. I had requested this of Susan following a
 18 conversation I had with her while the House
 19 was still in session and I would have went to
 20 the caucus room to call her to ask her about
 21 the memo the Premier had a copy of, and she
 22 had indicated that the Premier only had one
 23 portion of a longer--or a larger package of
 24 memos or materials by Dr. Ejeckam and she
 25 faxed these to me.

Page 297

1 CHAYTOR, Q.C.:
 2 Q. Okay, and if we could go back, please, to P-
 3 1615, prior to May 31st, had you even heard of
 4 the issue, any issues raised by Dr. Ejeckam?
 5 MS. MUNDON:
 6 A. Not that I can recall.
 7 CHAYTOR, Q.C.:
 8 Q. Had you ever heard his name mentioned before?
 9 MS. MUNDON:
 10 A. Not that I can recall, no.
 11 CHAYTOR, Q.C.:
 12 Q. Had you ever heard any reference to any issue
 13 regarding IHC staining or ER/PR testing dating
 14 back to 2003?
 15 MS. MUNDON:
 16 A. Not that I can recall.
 17 CHAYTOR, Q.C.:
 18 Q. And you think that's something, Ms. Mundon,
 19 that you would recall?
 20 MS. MUNDON:
 21 A. I do think I would recall.
 22 CHAYTOR, Q.C.:
 23 Q. In this memo--or sorry, e-mail at 1:05 to
 24 Susan, you're trying to reach Susan, you're in
 25 the House, the Premier has raised the memo and

Page 298

1 you tried to reach Susan, is that what
 2 happened?
 3 MS. MUNDON:
 4 A. Yes.
 5 CHAYTOR, Q.C.:
 6 Q. Okay. Why would you do that? Why are you
 7 phoning Susan Bonnell?
 8 MS. MUNDON:
 9 A. Like I just explained a few minutes ago, I had
 10 called her about the memo, that there was a
 11 document that the Premier had in the House
 12 that I wasn't aware of and I had called her to
 13 find out what it was and that's when she would
 14 have told me that it was part of a larger
 15 package and the larger package would have been
 16 sent to me, faxed -
 17 CHAYTOR, Q.C.:
 18 Q. I guess, yes, my question is why would you
 19 contact the director of communications for
 20 Eastern Health on it, as opposed to, for
 21 example, you're in the House, I assume Ms.
 22 Matthews, the director of communications for
 23 the Premier would be there, why not just ask
 24 Ms. Matthews or someone within government?
 25 MS. MUNDON:

Page 299

1 A. I did ask Ms. Matthews before I called Ms.
 2 Bonnell and she indicated that the Minister
 3 had given the Premier a copy.
 4 CHAYTOR, Q.C.:
 5 Q. Okay.
 6 MS. MUNDON:
 7 A. That the Minister was in the House. I
 8 probably would have contacted--I may have
 9 contacted the Deputy Minister before
 10 contacting Susan to see if he had any
 11 knowledge.
 12 CHAYTOR, Q.C.:
 13 Q. Okay, so you made inquiries within government
 14 first?
 15 MS. MUNDON:
 16 A. Yes.
 17 CHAYTOR, Q.C.:
 18 Q. You spoke to Ms. Matthews and you spoke to the
 19 deputy?
 20 MS. MUNDON:
 21 A. Yes.
 22 CHAYTOR, Q.C.:
 23 Q. And you learned that the Minister gave the
 24 memo to the Premier?
 25 MS. MUNDON:

Page 300

1 A. Yes.

2 CHAYTOR, Q.C.:

3 Q. So why do you need to speak to Ms. Bonnell?

4 MS. MUNDON:

5 A. To get part of the larger package of -

6 CHAYTOR, Q.C.:

7 Q. How did you know there was a larger package?

8 MS. MUNDON:

9 A. I don't know if the deputy told me, there was

10 some reason--I had talked to the deputy and

11 there was some reason why I followed up with

12 Ms. Bonnell.

13 CHAYTOR, Q.C.:

14 Q. Did the deputy ask you to follow up with Ms.

15 Bonnell?

16 MS. MUNDON:

17 A. He may have.

18 CHAYTOR, Q.C.:

19 Q. And do you think it was the deputy who advised

20 you there was a larger package, more than one

21 memo I take it that means?

22 MS. MUNDON:

23 A. It may have been, yes.

24 CHAYTOR, Q.C.:

25 Q. It may have been the deputy.

Page 301

1 MS. MUNDON:

2 A. Yes.

3 THE COMMISSIONER:

4 Q. Did you not say earlier that Ms. Bonnell told

5 you that?

6 MS. MUNDON:

7 A. That's what I had initially had thought, Madam

8 Commissioner, but I remember that I had talked

9 to both Ms. Matthews and Mr. Abbott before I

10 had contacted Ms. Bonnell.

11 CHAYTOR, Q.C.:

12 Q. In your message here to Ms. Bonnell, you're

13 saying "CBC only had memo", what are you

14 talking about there?

15 MS. MUNDON:

16 A. I can't recall.

17 CHAYTOR, Q.C.:

18 Q. So CBC has, I take it, Dr. Ejeckam's memo?

19 MS. MUNDON:

20 A. I would assume so, yes.

21 CHAYTOR, Q.C.:

22 Q. Is it possible that it was Ms. Bonnell who

23 contacted--was trying to contact you to find

24 out what was going on?

25 MS. MUNDON:

Page 302

1 A. Perhaps, I'm not quite sure.

2 CHAYTOR, Q.C.:

3 Q. Do you have any other recollection as to what

4 this is about?

5 MS. MUNDON:

6 A. No, I don't.

7 CHAYTOR, Q.C.:

8 Q. Who gave CBC the memo?

9 MS. MUNDON:

10 A. I think Ms. Matthews did, either Ms. Matthews

11 or the Premier himself.

12 CHAYTOR, Q.C.:

13 Q. And did you and Ms. Matthews have any

14 discussion about why the Premier had the memo

15 and why it would be referenced in the House?

16 MS. MUNDON:

17 A. No.

18 CHAYTOR, Q.C.:

19 Q. Okay. And you also write here, "Can you

20 please e-mail key messages once they are done

21 so the Minister has a copy." Key messages

22 regarding what?

23 MS. MUNDON:

24 A. I don't recall what the key messages would be

25 for.

Page 303

1 CHAYTOR, Q.C.:

2 Q. And did you ever receive copies--did you ever

3 receive any key messages from Ms. Bonnell

4 after this, May 31st?

5 MS. MUNDON:

6 A. Not to my knowledge.

7 CHAYTOR, Q.C.:

8 Q. And you have no recollection what that's

9 about?

10 MS. MUNDON:

11 A. No.

12 CHAYTOR, Q.C.:

13 Q. If we could look at P-1616 please? So on the

14 issue regarding Dr. Ejeckam's memo, is it

15 possible that you wanted to contact Ms.

16 Bonnell to let her know this had happened in

17 the House? Were you trying to give her a

18 heads up?

19 MS. MUNDON:

20 A. I don't remember knowing about the Dr. Ejeckam

21 letter before the House session opened that

22 day, so it doesn't seem likely that I would be

23 calling her to give her heads up, unless -

24 CHAYTOR, Q.C.:

25 Q. No, but if it's happening at that time, yes,

1 certainly this is at 1:05; House would have
 2 opened at 1:30, is that right?
 3 MS. MUNDON:
 4 A. Yes.
 5 CHAYTOR, Q.C.:
 6 Q. So your e-mail on the 31st to Ms. Bonnell is
 7 before the memo has been referenced in the
 8 House?
 9 MS. MUNDON:
 10 A. I just can't recall the specifics around that.
 11 CHAYTOR, Q.C.:
 12 Q. Does the House always open at 1:30?
 13 MS. MUNDON:
 14 A. Yes. On Wednesdays it opens at 2:00.
 15 CHAYTOR, Q.C.:
 16 Q. So at 1:05 on May 31st, the House would not
 17 have been opened?
 18 MS. MUNDON:
 19 A. No.
 20 CHAYTOR, Q.C.:
 21 Q. So "CBC only had the memo", so you're telling
 22 Ms. Bonnell that CBC has the memo at 1:05 on
 23 that day.
 24 MS. MUNDON:
 25 A. I just can't recall, I don't even remember why

1 CHAYTOR, Q.C.:
 2 Q. Okay. 1616, please. And this is a fax to you
 3 on the same day, May 31st, from Eastern Health
 4 and it's forwarded, it says, on behalf of
 5 George Tilley, and this is a spreadsheet of
 6 recommendations, immunohistochemistry service.
 7 Spreadsheet, Dr. Banerjee and Trish
 8 Wegrynowski, updated June 30th, 2006. How did
 9 this document come to be forwarded to you by
 10 Mr. Tilley?
 11 MS. MUNDON:
 12 A. It was my understanding that the Deputy had
 13 requested it, if I'm not mistaken, and that
 14 may have been the day that Mr. Abbott would
 15 have left the Department, and so then it was
 16 forwarded to me to give to the Minister, I
 17 assume.
 18 CHAYTOR, Q.C.:
 19 Q. Okay. So this is the day that Mr. Abbott left
 20 his employment?
 21 MS. MUNDON:
 22 A. I think so, if I can recall correctly.

1 CBC would have the memo before the House would
 2 be opened, like I don't recall how they would
 3 have received that.

1 CHAYTOR, Q.C.:
 2 Q. And he had a prior request for the
 3 recommendations?
 4 MS. MUNDON:
 5 A. As I understand.
 6 CHAYTOR, Q.C.:
 7 Q. So it was sent to you instead?
 8 MS. MUNDON:
 9 A. Yes.
 10 CHAYTOR, Q.C.:
 11 Q. Okay. Were you aware that Mr. Abbott had also
 12 requested copies of Dr. Banerjee and Ms.
 13 Wegrynowski's reports and they were to be
 14 forwarded to him on this day as well?
 15 MS. MUNDON:
 16 A. No, I wasn't.
 17 CHAYTOR, Q.C.:
 18 Q. Who told you that he had made this request for
 19 the recommendations?
 20 MS. MUNDON:
 21 A. I believe it may have been his secretary, I'm
 22 not sure, but I just know this fax came into
 23 me and I didn't have any prior knowledge of
 24 what it was about.
 25 CHAYTOR, Q.C.:

Page 307

1 Q. So you received this without any prior
 2 knowledge as to what it's about, and what did
 3 you do?
 4 MS. MUNDON:
 5 A. I brought it to the Minister's attention, I
 6 believe.
 7 CHAYTOR, Q.C.:
 8 Q. But did you phone Ms. Penney and ask her?
 9 MS. MUNDON:
 10 A. No, I didn't.
 11 CHAYTOR, Q.C.:
 12 Q. Okay. So did you have any--so you brought it
 13 to the Minister?
 14 MS. MUNDON:
 15 A. Yes.
 16 CHAYTOR, Q.C.:
 17 Q. And what did--did the Minister know what it
 18 was about?
 19 MS. MUNDON:
 20 A. I can't recall if he did or not.
 21 CHAYTOR, Q.C.:
 22 Q. So who told you that Mr. Abbott had requested
 23 it?
 24 MS. MUNDON:
 25 A. I believe it may have been his secretary, Mr.

Page 308

1 Abbott's secretary.
 2 CHAYTOR, Q.C.:
 3 Q. Oh, Mr. Abbott's secretary?
 4 MS. MUNDON:
 5 A. Yes.
 6 CHAYTOR, Q.C.:
 7 Q. I'm sorry, okay, and who is she?
 8 MS. MUNDON:
 9 A. Ms. Donahue.
 10 CHAYTOR, Q.C.:
 11 Q. Ms. Donahue, okay. So you spoke to Ms.
 12 Donahue about it?
 13 MS. MUNDON:
 14 A. I believe so, yes.
 15 CHAYTOR, Q.C.:
 16 Q. And she was aware that Mr. Abbott had
 17 requested this?
 18 MS. MUNDON:
 19 A. I think so.
 20 CHAYTOR, Q.C.:
 21 Q. And she didn't indicate whether he'd requested
 22 anything else?
 23 MS. MUNDON:
 24 A. No.
 25 CHAYTOR, Q.C.:

Page 309

1 Q. And when you brought this to the Minister, did
 2 the Minister ask whether or not there was
 3 anything else?
 4 MS. MUNDON:
 5 A. Not that I recall, no.
 6 CHAYTOR, Q.C.:
 7 Q. And did the Minister seem to know what this
 8 was about?
 9 MS. MUNDON:
 10 A. I can't remember if he did or not.
 11 CHAYTOR, Q.C.:
 12 Q. Did you have any discussions with anyone else
 13 at Eastern Health or within the Department
 14 about this document after receiving it?
 15 MS. MUNDON:
 16 A. No, I didn't.
 17 CHAYTOR, Q.C.:
 18 Q. And after passing it on to the Minister, did
 19 you ever have--did you ever see the document
 20 again?
 21 MS. MUNDON:
 22 A. I don't recall ever seeing it, no.
 23 CHAYTOR, Q.C.:
 24 Q. And did anyone ever have any discussion with
 25 you about this document?

Page 310

1 MS. MUNDON:
 2 A. Not that I recall.
 3 CHAYTOR, Q.C.:
 4 Q. Did you read it yourself before you passed it
 5 on?
 6 MS. MUNDON:
 7 A. No, I wouldn't have read it.
 8 CHAYTOR, Q.C.:
 9 Q. And did you happen to note the date of when it
 10 was last updated, being June 30th, 2006?
 11 MS. MUNDON:
 12 A. No, I wouldn't have noticed that.
 13 CHAYTOR, Q.C.:
 14 Q. In terms of recommendations being implemented
 15 or references in briefing notes to
 16 recommendations being implemented or having
 17 been implemented, do you recall any discussion
 18 in the Department as to the status of
 19 recommendations and whether or not they had
 20 all been implemented when briefing notes were
 21 being drafted? Do you remember any discussion
 22 in the Department around that?
 23 MS. MUNDON:
 24 A. No, I don't. That sort of background material
 25 would already be in the briefing note before

Page 311

1 it came to me in most cases.
 2 CHAYTOR, Q.C.:
 3 Q. And then if we could look again please at
 4 1262? And this is at 2:00, it appears, on the
 5 31st that you get the fax then forwarded as
 6 well on behalf of George Tilley, and this is
 7 the fax that includes a number of documents.
 8 What did you do with those documents when you
 9 received them?
 10 MS. MUNDON:
 11 A. I would have passed them on to the Minister.
 12 CHAYTOR, Q.C.:
 13 Q. You would have given those to the Minister?
 14 MS. MUNDON:
 15 A. Yes.
 16 CHAYTOR, Q.C.:
 17 Q. Okay, and would you have given those to the
 18 Minister as soon as you received them?
 19 MS. MUNDON:
 20 A. I believe I would have, yes.
 21 CHAYTOR, Q.C.:
 22 Q. And that's 2:00 on May 31st?
 23 MS. MUNDON:
 24 A. If the House was open, I may not have received
 25 this fax until I got back over to the office

Page 312

1 or I may have had it left for him. I can't
 2 recall if I would have brought over a package
 3 for him or if I would have left it for him in
 4 his office.
 5 CHAYTOR, Q.C.:
 6 Q. Do you remember, you went to the House that
 7 day?
 8 MS. MUNDON:
 9 A. Um-hm.
 10 CHAYTOR, Q.C.:
 11 Q. And you were there when the Premier brings
 12 forth the June 2003 memo?
 13 MS. MUNDON:
 14 A. Um-hm.
 15 CHAYTOR, Q.C.:
 16 Q. Okay. Did you have these documents in your
 17 possession while you were at the House that
 18 day or had you already given them to the
 19 Minister?
 20 MS. MUNDON:
 21 A. I can't recall. I can't recall a lot about
 22 that because I don't remember being involved
 23 in this whole--the whole issue about the memos
 24 and while we were requesting them.
 25 CHAYTOR, Q.C.:

Page 313

1 Q. But you would have given them, as soon as you
 2 could, to the Minister?
 3 MS. MUNDON:
 4 A. Yes.
 5 CHAYTOR, Q.C.:
 6 Q. And it included the entire package?
 7 MS. MUNDON:
 8 A. Yes.
 9 CHAYTOR, Q.C.:
 10 Q. If we could look, please, at P-0227? And do
 11 you recall any discussion then in the
 12 Department around after receiving those
 13 documents, any discussion with the Minister or
 14 Ms. Hennessey or anyone else in the Department
 15 around the Dr. Ejeckam memos?
 16 MS. MUNDON:
 17 A. No, I don't recall any conversations on that.
 18 CHAYTOR, Q.C.:
 19 Q. Okay, P-0227, Ms. Bonnell is e-mailing you on
 20 June the 1st, the following day, and she's
 21 sending along a draft ad. You'll see attached
 22 here is the draft ad. What input did you have
 23 into drafting this ad?
 24 MS. MUNDON:
 25 A. I wouldn't have had any input with drafting

Page 314

1 it. I would have--I think I would have
 2 reviewed it, and I believe I sent it to the
 3 Premier's office for their review as well.
 4 CHAYTOR, Q.C.:
 5 Q. I'm sorry?
 6 MS. MUNDON:
 7 A. I would have reviewed it once it was drafted,
 8 and I believe that I may have sent it to the
 9 Premier's office for their review as well.
 10 CHAYTOR, Q.C.:
 11 Q. Okay, and do you recall any discussion or
 12 concern around any statements regarding
 13 patient contact in this ad, at the time it's
 14 being drafted?
 15 MS. MUNDON:
 16 A. I don't recall any concerns at that point in
 17 time, no.
 18 CHAYTOR, Q.C.:
 19 Q. And if we could look at, please, 0955? And I
 20 understand this is the final copy of the ad,
 21 and this, Ms. Mundon, appears to be an
 22 affirmation that all patients have been
 23 contacted. It says "we called all patients
 24 whose samples were being retested. We
 25 informed all patients and their doctors of

Page 315

1 their individual test results." Is that
 2 consistent with what you had been told by
 3 Eastern Health, in terms of patient
 4 notification?
 5 MS. MUNDON:
 6 A. I would assume so, yes.
 7 CHAYTOR, Q.C.:
 8 Q. Had you specifically been told by Eastern
 9 Health that all patients had been contacted,
 10 both contacted when their samples were being
 11 retested and then contacted, informed of their
 12 individual test results?
 13 MS. MUNDON:
 14 A. That was my understanding from Eastern Health
 15 at the time, yes.
 16 CHAYTOR, Q.C.:
 17 Q. And who told you that?
 18 MS. MUNDON:
 19 A. I think it would have been Ms. Bonnell.
 20 CHAYTOR, Q.C.:
 21 Q. And when Ms. Bonnell told you that, was there
 22 ever any qualification given or any doubt
 23 expressed by her as to whether that in fact
 24 was the case or whether they could determine
 25 that to be the case?

Page 316

1 MS. MUNDON:
 2 A. No.
 3 CHAYTOR, Q.C.:
 4 Q. And when had you last spoken to Ms. Bonnell
 5 about that issue? This is now June 1st.
 6 MS. MUNDON:
 7 A. I can't recall when I would have talked to her
 8 about it.
 9 CHAYTOR, Q.C.:
 10 Q. If we could look at, please, P-0230? And this
 11 is an e-mail to the Minister and Mr. Thompson
 12 and a question has arisen in Question Period
 13 where the leader of the opposition at the time
 14 is suggesting Eastern Health is misleading the
 15 public with the ad that we just referred to,
 16 and you're bringing that to the attention of
 17 Mr. Thompson as well as Mr. Wiseman. I take
 18 it at this point in time, Mr. Thompson is now
 19 the--is he the Acting Deputy Minister?
 20 MS. MUNDON:
 21 A. Yes.
 22 CHAYTOR, Q.C.:
 23 Q. Okay, and you write "Minister/Robert, further
 24 to the exchange in Question Period today where
 25 Gerry Reid said that Eastern Health is

Page 317

1 misleading the public in its full page ad by
 2 saying that they informed all patients and
 3 their doctors of their individual test
 4 results, Deanne Fleet asked for a response
 5 from Government. She was unable to wait for
 6 the Minister to do an interview, but I
 7 indicated that we would send a statement to
 8 their producer. Here's what I'm suggesting.
 9 Please advise if you're okay with this." And
 10 then what you've done here, Ms. Mundon, is "as
 11 contained in a backgrounder to a news release
 12 issued on May 22nd, 2007," so that's the news
 13 release, the backgrounder to the news release
 14 regarding the Inquiry, "Eastern Health
 15 contacted each patient who was affected by the
 16 ER/PR test review or their family physician to
 17 make sure they received all the information
 18 and support they required and they were told
 19 one of three things," and we've seen that
 20 reference before. So your advice to the
 21 Minister is to send along this statement,
 22 which is reaffirming that each patient has, in
 23 fact, or their doctor has been contacted?
 24 MS. MUNDON:
 25 A. Yes, based on the fact that again this was

Page 318

1 checked and double checked by Eastern Health
 2 at the time it was included in the
 3 backgrounder.
 4 CHAYTOR, Q.C.:
 5 Q. Okay, and why is Mr. Reid in the House
 6 questioning whether all patients have been
 7 contacted?
 8 MS. MUNDON:
 9 A. I can't recall specifically what he would have
 10 said, but I would assume that there was doubt
 11 in his mind, given that there may have been an
 12 individual cancer patient who may not have
 13 been contacted.
 14 CHAYTOR, Q.C.:
 15 Q. Yes. Were there patients in the media at that
 16 time saying they had not been contacted?
 17 MS. MUNDON:
 18 A. There may have been, and each time that we
 19 posed the question to Eastern Health about
 20 that, they always--well, not with me with Ms.
 21 Bonnell, but when the Department posed it, I
 22 believe Ms. Hennessey, there seemed to always
 23 be a qualifier there that, you know,
 24 individuals would be in a certain subset or
 25 they wouldn't be affected by this, or there

Page 319

1 was always some explanation provided by
 2 Eastern Health to when we would inquire about
 3 that.
 4 CHAYTOR, Q.C.:
 5 Q. Ms. Mundon, in terms of communications though
 6 and giving advice to the Minister on this
 7 issue, if patients are coming forward and
 8 saying "we have not been contacted" and
 9 Eastern Health, you're saying, would reaffirm
 10 or have an explanation as to why a particular
 11 patient wasn't contacted--is that what you're
 12 saying, they would come with an explanation
 13 for that particular case? Why would the
 14 Minister say anything on it? Why would the
 15 Minister come down and reiterate what Eastern
 16 Health is saying?
 17 MS. MUNDON:
 18 A. Well, I'm just suggesting that he say this
 19 because at the time, Government still believed
 20 that Eastern Health had contacted all of its
 21 patients.
 22 CHAYTOR, Q.C.:
 23 Q. So Government believed Eastern Health and not
 24 the patients?
 25 MS. MUNDON:

Page 320

1 A. I wouldn't say that Government wasn't
 2 believing the patients. It was just at the
 3 time, Government had questioned on several
 4 occasions whether patients were contacted and
 5 we were given the assurances that they had
 6 been.
 7 CHAYTOR, Q.C.:
 8 Q. And your best advice, from a communications
 9 point of view, to the Minister is go out and
 10 say the same thing, they've all been
 11 contacted?
 12 MS. MUNDON:
 13 A. I'm asking for the advice of the Deputy
 14 Minister and the Minister on this point.
 15 CHAYTOR, Q.C.:
 16 Q. Well, you're suggesting to them, "here's what
 17 I'm suggesting. Please advise if you are okay
 18 with it."
 19 MS. MUNDON:
 20 A. I'm suggesting it because, again as I
 21 indicated before, this information was checked
 22 and rechecked by Eastern Health at the time it
 23 was used in the backgrounder.
 24 CHAYTOR, Q.C.:
 25 Q. Okay, and from the time that you're sending

Page 321

1 this on June 6th at 4:08 p.m., from the time
 2 that Mr. Reid said that in the House on that
 3 date until you send this e-mail, had you
 4 checked again with Eastern Health on this
 5 issue?
 6 MS. MUNDON:
 7 A. I did not check with them myself, no.
 8 CHAYTOR, Q.C.:
 9 Q. Okay, who did?
 10 MS. MUNDON:
 11 A. I'm not sure if anybody had at that point in
 12 time, because again, they had--we had
 13 confirmed that on two or three occasions
 14 before going out with the media briefing, or
 15 sorry, the backgrounder in the media release.
 16 CHAYTOR, Q.C.:
 17 Q. So back on May 22nd?
 18 MS. MUNDON:
 19 A. Yes.
 20 CHAYTOR, Q.C.:
 21 Q. If we could have P-0231, please? Doubt seems
 22 to have crept into Mr. Thompson's mind. He
 23 responds to you "I like the idea of referring
 24 to previously released material. The only
 25 possible remaining question is whether some of

Page 322

1 the communications only went to physicians,
 2 raising the possibility that physicians did
 3 not contact patients. In other words, is it
 4 possible that some patients were not contacted
 5 at all?" And that's his response at 4:38 p.m.
 6 that day, to which you reply two minutes
 7 later, "Susan Bonnell reconfirmed for me today
 8 on the phone that once the letter was sent to
 9 physicians regarding patients that they
 10 followed up with individual physicians to
 11 ensure that patients were contacted." So did
 12 you have a discussion with Ms. Bonnell on June
 13 6th about this?
 14 MS. MUNDON:
 15 A. I guess I did, according to the written
 16 document.
 17 CHAYTOR, Q.C.:
 18 Q. And what did Ms. Bonnell tell you?
 19 MS. MUNDON:
 20 A. I would have asked her, I guess, again to
 21 confirm the fact that this was accurate and
 22 that Mr. Reid, you know, had raised doubt, and
 23 she would have reconfirmed for me, once again,
 24 that they had contacted all the patients.
 25 CHAYTOR, Q.C.:

Page 323

1 Q. Well, this is specifically saying that Ms.
 2 Bonnell reconfirmed for you that not only did
 3 a letter go to the physicians, but once that
 4 happened, Eastern Health then followed up with
 5 the individual physicians to ensure the
 6 patients had been contacted. That's very
 7 specific.
 8 MS. MUNDON:
 9 A. Yes.
 10 CHAYTOR, Q.C.:
 11 Q. And Ms. Bonnell told you that on June 6th?
 12 MS. MUNDON:
 13 A. Yes.
 14 CHAYTOR, Q.C.:
 15 Q. And that's clear in your recollection?
 16 MS. MUNDON:
 17 A. Yes.
 18 CHAYTOR, Q.C.:
 19 Q. Okay, without having to refer to this e-mail?
 20 MS. MUNDON:
 21 A. I'm certainly using the e-mail to help my
 22 memory on that point.
 23 CHAYTOR, Q.C.:
 24 Q. Do you have any independent recollection of a
 25 discussion with Ms. Bonnell on this issue?

Page 324

1 MS. MUNDON:
 2 A. I can recall talking to her, but I'm not sure
 3 if I recall those specific words being said,
 4 but I certainly wouldn't put them in an e-mail
 5 if it wasn't what she had told me.
 6 CHAYTOR, Q.C.:
 7 Q. Okay. If we could have P-0959, please? And
 8 this is from yourself to Ms. Bonnell, the next
 9 day, June 7th at 9:38 in the morning and
 10 you've copied Mr. Thompson and Ms. Hennessey.
 11 Subject "do you know what letter they are
 12 referring to?" Importance is high and high
 13 priority, and you're talking about--it looks
 14 like it must be an open line show. Is that
 15 correct?
 16 MS. MUNDON:
 17 A. Yes.
 18 CHAYTOR, Q.C.:
 19 Q. Host preamble. "The opposition says the
 20 government is in damage control mode when it
 21 comes to the faulty breast cancer testing in
 22 Eastern Health. The government said last week
 23 that the people who were wrongly tested were
 24 told in 2005. Linda, however, had a letter
 25 that says the opposite of this." And so

Page 325

1 you're sending this to Ms. Bonnell. "Do you
 2 know what letter they're referring to?" And
 3 she comes back and she says, "I assume they
 4 were referring to the Ejeckam letter when she
 5 first saw this, but I'm not so sure." Were
 6 you ever able to determine what letter was
 7 being referred to?
 8 MS. MUNDON:
 9 A. I don't believe so, no.
 10 CHAYTOR, Q.C.:
 11 Q. Was there any further inquiry made around this
 12 issue?
 13 MS. MUNDON:
 14 A. I'm not sure if there was additional inquiry
 15 made within the department or not.
 16 CHAYTOR, Q.C.:
 17 Q. P-0962? And this is an e-mail from Ms.
 18 Hennessey to Mr. Coates, and it references an
 19 ER/PR binder that you had recently prepared,
 20 which includes the notes that are prepared by
 21 the RHO branch. And this is regarding ATIPPA
 22 requests. And again, this is now June 12th,
 23 2007. What is this binder that you were
 24 preparing?
 25 MS. MUNDON:

Page 326

1 A. This is the binder that I referenced on a
 2 number of other occasions throughout my
 3 testimony. It was a binder that I compiled
 4 for the minister on all documentation related
 5 to ER/PR.
 6 CHAYTOR, Q.C.:
 7 Q. So it was the minister who asked you to
 8 prepare that?
 9 MS. MUNDON:
 10 A. I'm not sure if the minister asked me to
 11 prepare it or if I put it together on my own.
 12 CHAYTOR, Q.C.:
 13 Q. Okay. What was the purpose of the binder?
 14 MS. MUNDON:
 15 A. To have all the materials in the one binder
 16 for the minister.
 17 CHAYTOR, Q.C.:
 18 Q. And did it contain anything other than
 19 briefing notes?
 20 MS. MUNDON:
 21 A. It had briefing notes, media clippings,
 22 materials from the media, the two media
 23 briefings would be in there.
 24 CHAYTOR, Q.C.:
 25 Q. Did it also include e-mail?

Page 327

1 MS. MUNDON:
 2 A. No, it did not.
 3 CHAYTOR, Q.C.:
 4 Q. Okay. Anything else?
 5 MS. MUNDON:
 6 A. It included the Cabinet presentation from May.
 7 CHAYTOR, Q.C.:
 8 Q. And that's it?
 9 MS. MUNDON:
 10 A. That's it, I believe.
 11 CHAYTOR, Q.C.:
 12 Q. Okay. And P-0475, please? And this is now
 13 June 21st. And the subject is "No room for
 14 secrecy when lives are at stake." And it's an
 15 article by Andre Picard. And you send this to
 16 Ms. Bonnell, Mr. Tilley, Ms. Hennessey, Mr.
 17 Thompson and Minister Wiseman. And why did
 18 you send it to that group of people?
 19 MS. MUNDON:
 20 A. Just because it was a story, I believe, in the
 21 Globe and Mail.
 22 CHAYTOR, Q.C.:
 23 Q. It's by the same author as the article which
 24 you wrote the letter in response to?
 25 MS. MUNDON:

Page 328

1 A. Yes.
 2 CHAYTOR, Q.C.:
 3 Q. Okay. So does that shed any light on why you
 4 included Eastern Health people in this?
 5 MS. MUNDON:
 6 A. Yes.
 7 CHAYTOR, Q.C.:
 8 Q. Okay. Was there any further discussion in the
 9 department or with Eastern Health about this
 10 article after you sent it along?
 11 MS. MUNDON:
 12 A. No.
 13 CHAYTOR, Q.C.:
 14 Q. Okay. No feedback on that at all?
 15 MS. MUNDON:
 16 A. Not that I'm aware of, no.
 17 CHAYTOR, Q.C.:
 18 Q. 1620, please? And this is e-mail exchange,
 19 we're now into July, July 12th, 2007. And
 20 it's regarding a ATIPPA request. And you
 21 write to Mr. Coates saying, "Reg, we need a
 22 copy of the ATIPPA request sent to Elizabeth,
 23 Brian Crawley and Brian Taylor first thing
 24 tomorrow. There is one section included that
 25 was previously severed. Can you please call

Page 329

1 me? Thanks." What can you tell us about
 2 this, what do you recall about this?
 3 MS. MUNDON:
 4 A. This was an Access to Information request that
 5 was received in the department. Typically--
 6 well, Mr. Coates is the director responsible
 7 for these type of requests and typically I
 8 would just get copied as for my information
 9 only and I wouldn't be directly involved with
 10 anything related to the requests. In this
 11 particular instance they were asking, the
 12 requester was asking for copies of briefing
 13 notes on ER/PR for each of the three minister
 14 of health and the Premier's office was
 15 involved with this, and I was basically going
 16 back between the Premier's office and Mr.
 17 Coates.
 18 CHAYTOR, Q.C.:
 19 Q. And why is the Premier's office involved, is
 20 that normal in these types of requests?
 21 MS. MUNDON:
 22 A. I'm not sure if it would be normal or not
 23 because I'm not usually involved with
 24 preparing these requests. I know that I
 25 believe that they're normally vetted through

Page 330

1 Cabinet Secretariat and I assume from there
 2 they would go to the Premier's office.
 3 CHAYTOR, Q.C.:
 4 Q. And do you know what is the section included
 5 that had previously been severed?
 6 MS. MUNDON:
 7 A. No, I don't recall.
 8 CHAYTOR, Q.C.:
 9 Q. And what does it mean by previously severed,
 10 is that severed from a prior ATIPPA request?
 11 MS. MUNDON:
 12 A. I assume it would be talking about different
 13 versions of the material as they're getting
 14 ready to--getting the request ready in terms
 15 of what information should be disclosed and
 16 what information couldn't be disclosed through
 17 the legislation.
 18 CHAYTOR, Q.C.:
 19 Q. And do you have any other recollection around
 20 this then, and this request?
 21 MS. MUNDON:
 22 A. No, I don't.
 23 CHAYTOR, Q.C.:
 24 Q. If we could have, please, 0238? And, Ms.
 25 Mundon, this is now July 13th, that following

Page 331

1 day, and you're writing an e-mail to Mr.
 2 Wiseman and to Mr. Thompson, copying Mr.
 3 Thompson. "ER/PR key messages, ATIPPA
 4 request." Importance high. "Minister, please
 5 see key messages below for your review in
 6 response to ATIPPA request. Thanks, Tansy."
 7 And then you have key messages for the
 8 minister regarding the ATIPPA request of July
 9 12th, 2007. Is that usual, that key messages
 10 are put together when there's an ATIPPA
 11 request?
 12 MS. MUNDON:
 13 A. If it affects the minister directly I would
 14 say that it wouldn't be unusual.
 15 CHAYTOR, Q.C.:
 16 Q. Have you ever done that before or since?
 17 MS. MUNDON:
 18 A. Not that I recall, but I don't recall any
 19 requests of this nature before or since.
 20 CHAYTOR, Q.C.:
 21 Q. Okay. And what were you trying to, in those
 22 key messages, what were you trying to convey?
 23 MS. MUNDON:
 24 A. I think just for the minister to have some
 25 messaging around the issue.

Page 332

1 CHAYTOR, Q.C.:
 2 Q. And what would the message be that you're
 3 trying to convey?
 4 MS. MUNDON:
 5 A. The fact that government has committed to
 6 disclosure and that the Inquiry has been
 7 called and government is looking forward to
 8 the results.
 9 COMMISSIONER:
 10 Q. I guess I'm not familiar enough with ATIPPA
 11 requests. I thought an ATIPPA request was a
 12 request for documents that were already
 13 existing?
 14 MS. MUNDON:
 15 A. Yes, that's correct.
 16 COMMISSIONER:
 17 Q. So -
 18 MS. MUNDON:
 19 A. This is not part of the, what would be
 20 released, Madam Commissioner, this would be
 21 just given that the materials are being
 22 released through an ATIPPA request, I had
 23 separately prepared some messaging for the
 24 minister in the event that he would get an
 25 inquiry from the media.

Page 333

1 COMMISSIONER:
 2 Q. Oh, this is for the follow up to the ATIPPA
 3 request?
 4 MS. MUNDON:
 5 A. Yes.
 6 COMMISSIONER:
 7 Q. Oh, I see, all right. Thank you.
 8 CHAYTOR, Q.C.:
 9 Q. So this is if the minister gets questioned
 10 around once the information has now gone out?
 11 MS. MUNDON:
 12 A. Yes.
 13 CHAYTOR, Q.C.:
 14 Q. Okay. And you were anticipating that the
 15 minister may have questions around that?
 16 MS. MUNDON:
 17 A. Yes.
 18 CHAYTOR, Q.C.:
 19 Q. If we could have, please, P-1619? And this is
 20 a fax to Ms. Matthews, Ms. Cheeseman, Ms.
 21 Turpin and Mr. Crawley, July 17th, 2007 from
 22 yourself. And the subject is "Eastern Health,
 23 ER/PR ATIPPA request." So Eastern Health also
 24 has its own ATIPPA request?
 25 MS. MUNDON:

Page 334

1 A. Yes.
 2 CHAYTOR, Q.C.:
 3 Q. And you indicate, your comments are, "Please
 4 see attached response from Eastern Health
 5 interim CEO, Louise Jones to Mark Quinn
 6 regarding his request under ATIPPA. As you
 7 may recall, the information and privacy
 8 commissioner released his report on June 29th,
 9 2007 which recommended that the request be
 10 disclosed with all identifying information
 11 severed. Eastern Health has agreed to release
 12 this information within 30 days of their
 13 letter. The department has asked for a copy
 14 of the information prior to its release." Why
 15 would you be sending this on to Ms. Matthews
 16 and the others?
 17 MS. MUNDON:
 18 A. Just for their information, given that the
 19 department and government was having, closely
 20 involved with the file and the fact that the
 21 government had also received an Access to
 22 Information request.
 23 CHAYTOR, Q.C.:
 24 Q. And why would the department be asking for a
 25 copy of the information prior to its release

Page 335

1 to Mr. Quinn?

2 MS. MUNDON:

3 A. Just for information.

4 CHAYTOR, Q.C.:

5 Q. Is that -

6 MS. MUNDON:

7 A. Just as a heads up.

8 CHAYTOR, Q.C.:

9 Q. Is that how that's normally handled?

10 MS. MUNDON:

11 A. I don't know because I'm normally not involved

12 with Access to Information requests.

13 CHAYTOR, Q.C.:

14 Q. And did the department, in fact, receive the

15 information prior to -

16 MS. MUNDON:

17 A. Not to my knowledge, no.

18 CHAYTOR, Q.C.:

19 Q. They didn't, you didn't receive it?

20 MS. MUNDON:

21 A. I did not. Not that I remember, no.

22 CHAYTOR, Q.C.:

23 Q. You did not or you don't know?

24 MS. MUNDON:

25 A. I don't know, I don't remember receiving it.

Page 336

1 CHAYTOR, Q.C.:

2 Q. Did the department provide any input into what

3 would be released to Mr. Quinn?

4 MS. MUNDON:

5 A. Not that I remember, no.

6 CHAYTOR, Q.C.:

7 Q. And the decision as to whether or not to give

8 Mr. Quinn the information without any further

9 appeal process, are you aware of anything to

10 do with that?

11 MS. MUNDON:

12 A. That was a decision taken by the authority.

13 CHAYTOR, Q.C.:

14 Q. Yes.

15 MS. MUNDON:

16 A. I'm not aware of anything further to that.

17 CHAYTOR, Q.C.:

18 Q. Okay. And do you know whether or not the

19 department had any input into that decision?

20 MS. MUNDON:

21 A. Not that I'm aware of.

22 CHAYTOR, Q.C.:

23 Q. If we could have 1518, please? And this is an

24 e-mail to Ms. Bonnell, August 3rd, 2007 "RE: A

25 Draft Release," a draft news release, I think

Page 337

1 it is. And starting at the beginning. Here

2 we go. You write to Susan "In discussions

3 between Joan and Robert this week she

4 indicated that there was a draft news release

5 prepared in relation to an Access to

6 Information request regarding the resignation

7 and that we should be provided the draft well

8 in advance. Can you please forward if

9 drafted?" And who is the Joan being referred

10 to?

11 MS. MUNDON:

12 A. That would be Ms. Dawe, the chair of the

13 board.

14 CHAYTOR, Q.C.:

15 Q. And Robert is Mr. Thompson?

16 MS. MUNDON:

17 A. Yes.

18 CHAYTOR, Q.C.:

19 Q. Okay. What do you recall about this, Ms.

20 Bonnell gets back to you and says, "No, no

21 news release is being issued. That must have

22 been a misunderstanding." What do you recall

23 about this?

24 MS. MUNDON:

25 A. I don't recall much about it other than what's

Page 338

1 here, that Mr. Thompson would have had a

2 discussion with Ms. Dawe and would have asked

3 me to follow up with Ms. Bonnell.

4 CHAYTOR, Q.C.:

5 Q. Okay. If you could please have 0995? And

6 this is your e-mail to Mr. Thompson. And I

7 think it's August 7th as opposed to July 8th,

8 August 7th. "RE: Forwarding a Draft Response

9 to MQ RE: ER/PR Results, ATIPP, Mark Quinn."

10 So I take it the MQ is Mark Quinn, is it?

11 MS. MUNDON:

12 A. Yes.

13 CHAYTOR, Q.C.:

14 Q. Okay. And "Robert, I have reviewed the

15 attached draft correspondence and provide the

16 following comments. (1) We really need to

17 see the raw data being released before

18 providing any comment on how the data could

19 potentially be interpreted." And you go on

20 from there, "My view is the explanatory

21 information does not serve to provide any sort

22 of analysis of interpretation of the raw data

23 and instead reiterates information that has

24 already been provided to the media in one form

25 or another." What was your concern, Ms.

Page 339

1 Mundon, about the information?
2 MS. MUNDON:
3 A. I'm just trying to recall exactly what the
4 information was that was provided here.
5 CHAYTOR, Q.C.:
6 Q. Let's see if there's anything else here that
7 might assist. Here's a letter, August 6th,
8 2007 to Mr. Quinn.
9 MS. MUNDON:
10 A. That's, I think that's the e-mail -
11 CHAYTOR, Q.C.:
12 Q. If you want to--does that jog your memory? If
13 you want to have a look at that?
14 MS. MUNDON:
15 A. I think what, if I can recall correctly, I
16 think what this is here is that there was a
17 concern that the raw data would be provided to
18 Mr. Quinn and it would mean nothing to him in
19 terms of how it could be interpreted. And if
20 you go down and look at the information that's
21 provided here, I just felt that it didn't help
22 him to interpret the data and it just
23 reiterate information that had already been
24 provided in previous documents.
25 CHAYTOR, Q.C.:

Page 340

1 Q. And there is explanatory information that's
2 included in the letter. "The interpretation
3 of this data is a complex process and we
4 advise there are a number of important factors
5 to keep in mind." And you're saying in your
6 e-mail to Mr. Thompson that you need to see or
7 "We really need to see the raw data being
8 released before providing any comment on how
9 the data could potentially be interpreted."
10 MS. MUNDON:
11 A. I don't think that the data was sent over, so
12 it was asking to comment on something that I
13 didn't know what I was commenting on.
14 CHAYTOR, Q.C.:
15 Q. Okay. So, the draft response that was going
16 to go to Mark Quinn on this ATIPP request by
17 Marian Crowley of Eastern Health was sent to
18 the department first for comment.
19 MS. MUNDON:
20 A. Yes, apparently it was.
21 CHAYTOR, Q.C.:
22 Q. And your concern was that in order to be able
23 to comment, you needed to see the raw data
24 that was being released.
25 MS. MUNDON:

Page 341

1 A. And that the explanatory information that's
2 supposed to be helpful to the person
3 requesting the information, in my view, didn't
4 serve to provide the kind of analysis that
5 would have been helpful.
6 CHAYTOR, Q.C.:
7 Q. And what kind of analysis were you expecting -
8 MS. MUNDON:
9 A. Just to explain what the numbers would mean as
10 opposed to talking about, like, again back to
11 what they had here, you know, talking about
12 the sensitivity with the ER/PR testing and to
13 me, it seemed like we were providing
14 information that had already been provided and
15 almost trying to explain when, you know--I
16 just didn't find that this would have been
17 helpful.
18 CHAYTOR, Q.C.:
19 Q. And what is it that you think would have been
20 more helpful? What is it that -
21 MS. MUNDON:
22 A. Well, typically and I think I recall speaking
23 to Mr. Coates on this, typically when you
24 respond with information that's requested, you
25 just provide the data that's requested. In

Page 342

1 this case, it looked like that there was an
2 attempt made to try to provide some messaging
3 in around the information as well. And that I
4 didn't feel that the information that's
5 provided wasn't helpful in terms of analysing
6 the data that would be provided to Mr. Quinn.
7 CHAYTOR, Q.C.:
8 Q. So, were you suggesting that it go without any
9 commentary whatsoever?
10 MS. MUNDON:
11 A. What I was suggesting, I think, was that if
12 we're going to provide explanatory
13 information, that it actually be that, that it
14 explain what the data means. And without
15 seeing the data, well, I couldn't say what
16 that would have had been, but that was the
17 point I was trying to make.
18 CHAYTOR, Q.C.:
19 Q. And you're saying that you--"I feel we need a
20 complete package of information to review
21 before the information is provided to the
22 requester and ultimately to the public". Why?
23 MS. MUNDON:
24 A. I don't recall why at the time that I would
25 have said this unless I would have just wanted

Page 343

1 to have a comfort level that the information
 2 that was being provided would have been
 3 accurate information.
 4 CHAYTOR, Q.C.:
 5 Q. The information is the information; the
 6 documents are the documents, I take it.
 7 MS. MUNDON:
 8 A. I'm not--I wasn't suggesting that we would not
 9 release information, just that the department
 10 was aware of what was being sent.
 11 CHAYTOR, Q.C.:
 12 Q. Yes, and I guess I'm just trying to understand
 13 why you think it would be important for the
 14 department to have that complete package of
 15 information before Mr. Quinn, who requested
 16 the information and was entitled to the
 17 information and the public, why would the
 18 department need that first?
 19 MS. MUNDON:
 20 A. I can't remember why I would have asked for
 21 that. Again, it wouldn't be the norm.
 22 CHAYTOR, Q.C.:
 23 Q. And was anyone, other than yourself,
 24 expressing this sentiment? Is this your idea
 25 or was anyone instructing you to get this

Page 344

1 information?
 2 MS. MUNDON:
 3 A. I was asked for my review on it and it was
 4 forwarded to me. The draft was forwarded to
 5 me by Mr. Thompson.
 6 CHAYTOR, Q.C.:
 7 Q. So, this is your own personal opinion?
 8 MS. MUNDON:
 9 A. I would assume so.
 10 CHAYTOR, Q.C.:
 11 Q. P-1000, please. And this is an e-mail to Ms.
 12 Cheeseman and Ms. Matthews and others and it's
 13 August 8 and again, it's about the same ATIPPA
 14 request, I understand and "for your
 15 information, just to update you on the ATIPPA
 16 request submitted to Eastern Health on ER/PR
 17 test results from 1997 to the present, request
 18 was initially submitted to Eastern Health on
 19 February 15 and was denied due to the position
 20 that the records were personal information.
 21 On June 28 the information and privacy
 22 commissioner recommended disclosure and
 23 Eastern Health agreed to release the
 24 information within 30 days. Eastern Health
 25 has compiled the data requested. It is in a

Page 345

1 chart format and is 22 pages long which I have
 2 attached. As you can see, the information is
 3 not easily interpreted. In discussions with
 4 Susan Bonnell, she indicated that should Mark
 5 Quinn seek interpretation of the data as a
 6 follow-up to this request, that Eastern Health
 7 will provide it. They will develop a strategy
 8 to deal with this if the request comes". So,
 9 why are you now forwarding this to Ms.
 10 Cheeseman and Ms. Matthews?
 11 MS. MUNDON:
 12 A. For their information.
 13 CHAYTOR, Q.C.:
 14 Q. Okay. And -
 15 MS. MUNDON:
 16 A. As a follow-up to the previous fax, I guess,
 17 that I would have sent earlier.
 18 CHAYTOR, Q.C.:
 19 Q. And you went back and obviously had
 20 discussions with Ms. Bonnell around this?
 21 MS. MUNDON:
 22 A. Yes.
 23 CHAYTOR, Q.C.:
 24 Q. And did you express to Ms. Bonnell your
 25 concerns about being able to interpret the

Page 346

1 data?
 2 MS. MUNDON:
 3 A. I believe that I would have, yes.
 4 CHAYTOR, Q.C.:
 5 Q. And did you have any discussions with Ms.
 6 Cheeseman or Ms. Matthews around this?
 7 MS. MUNDON:
 8 A. Not that I can recall.
 9 CHAYTOR, Q.C.:
 10 Q. And the idea of Eastern Health developing a
 11 strategy to deal with this if the request
 12 comes, whose idea is that?
 13 MS. MUNDON:
 14 A. I'm assuming Ms. Bonnell's.
 15 CHAYTOR, Q.C.:
 16 Q. So, Ms. Mundon, and I understand what you're
 17 saying, that you're not normally involved in
 18 ATIPPA requests at all.
 19 MS. MUNDON:
 20 A. That's true.
 21 CHAYTOR, Q.C.:
 22 Q. Even for the department.
 23 MS. MUNDON:
 24 A. That's true.
 25 CHAYTOR, Q.C.:

Page 347

1 Q. And in this situation you seem to be having a
 2 significant involvement in a request to
 3 Eastern Health. Do you know why? Who
 4 instructed you to play this role?
 5 MS. MUNDON:
 6 A. I can't recall.
 7 CHAYTOR, Q.C.:
 8 Q. And that would be something unusual, not part
 9 of your normal job duties?
 10 MS. MUNDON:
 11 A. That's true.
 12 CHAYTOR, Q.C.:
 13 Q. And this is just last August and you have no
 14 recollection who instructed you to do this?
 15 MS. MUNDON:
 16 A. No, I don't.
 17 CHAYTOR, Q.C.:
 18 Q. Do you know why government is involved in this
 19 at all?
 20 MS. MUNDON:
 21 A. No, I don't; I can't recall.
 22 CHAYTOR, Q.C.:
 23 Q. Ms. Mundon, in dealing with the ER/PR issue
 24 and your involvement, you were involved from
 25 September 2005 on through until your maternity

Page 348

1 leave in the summer of 2007. So, shortly
 2 after this, I take it, you went on leave.
 3 MS. MUNDON:
 4 A. Yes.
 5 CHAYTOR, Q.C.:
 6 Q. From a communications perspective, the
 7 government's communication perspective, have
 8 there been any lessons learned in how to deal
 9 with an issue of this nature?
 10 MS. MUNDON:
 11 A. I would say yes, that there would be lessons
 12 learned.
 13 CHAYTOR, Q.C.:
 14 Q. Okay. And if you could share those please,
 15 with the Commissioner?
 16 MS. MUNDON:
 17 A. Well, I think, from my perspective, the one
 18 point that I did find frustrating and I did
 19 feel torn on occasion is the fact that Eastern
 20 Health was an arm's length organization and I
 21 was told that from time to time, but at the
 22 same time, the public and the media have the
 23 expectation that the minister, of course,
 24 would be fully briefed on issues like this.
 25 So, I think a lesson learned there is that if

Page 349

1 there could somehow be a strengthened
 2 relationship between the department and
 3 Eastern Health to ensure that, you know, that
 4 the minister is receiving accurate and timely
 5 information, that that would be very
 6 important. Again, you know, I can't stress
 7 enough the importance of releasing information
 8 to the public in a timely manner as well. I
 9 just think that if there was a strengthened
 10 relationship between the department and
 11 Eastern Health and there was an onus on the
 12 health authorities to provide information to
 13 the department, that it would help to address
 14 this sort of thing in the future.
 15 CHAYTOR, Q.C.:
 16 Q. And while you're still--before you left on
 17 your maternity leave, did you notice any
 18 change in the government's communication
 19 strategy on any similar issue?
 20 MS. MUNDON:
 21 A. Yes, I did, with respect to the Burin
 22 radiology issue.
 23 CHAYTOR, Q.C.:
 24 Q. And how was that handled differently from the
 25 Government's point of view?

Page 350

1 MS. MUNDON:
 2 A. Well, from Government's point of view, rather
 3 than Government now relying on Eastern Health
 4 to go out to the public to communicate on this
 5 issue, Government took it in its own hands to
 6 communicate to the public. So essentially, the
 7 Minister went out on a weekly basis to provide
 8 up-to-date information to the public, as he
 9 was provided the information by Eastern
 10 Health.
 11 CHAYTOR, Q.C.:
 12 Q. And I take it if that information changed from
 13 week to week, it was a matter of updating the
 14 information?
 15 MS. MUNDON:
 16 A. Yes. It was just a matter of telling the
 17 public what you know, when you know it, and
 18 telling it accurately. Everybody knows that
 19 you can't have the answer to a problem--you
 20 can't have all the answers at once, and as an
 21 issue evolves, there are certain things that
 22 you know at certain points in time, and what
 23 we did with Burin radiology was just share
 24 what was known at certain points in time.
 25 CHAYTOR, Q.C.:

Page 351

1 Q. And you mentioned the strengthening of the
 2 relationship between the Health Authority and
 3 Government. Did your relationship--you
 4 mentioned at quite some length through my
 5 questioning, not your fault, through my
 6 questioning, about issues that you had in
 7 communications. Did that change? Did your
 8 relationship change in terms of communicating
 9 with Eastern Health?
 10 MS. MUNDON:
 11 A. In terms of Burin radiology specifically or in
 12 terms of -
 13 CHAYTOR, Q.C.:
 14 Q. While you were still in your position, up
 15 until last summer. Did you notice any
 16 strengthening of the relationship from the
 17 communication perspective?
 18 MS. MUNDON:
 19 A. I would say that the relationship had improved
 20 towards the end, before I went on maternity
 21 leave.
 22 CHAYTOR, Q.C.:
 23 Q. And if I could just--and I know we spoke about
 24 this yesterday, but I'd just like to come back
 25 to it before we finish up. The issues that

Page 352

1 you were having with Ms. Bonnell and feeling a
 2 resistance or a defensiveness, as you call it,
 3 was that just around communications issues?
 4 MS. MUNDON:
 5 A. From her perspective?
 6 CHAYTOR, Q.C.:
 7 Q. Well, from your perspective. Was it--what is
 8 it that you were looking for from Ms. Bonnell
 9 that you were feeling a resistance or a
 10 defensiveness in providing you the
 11 information?
 12 MS. MUNDON:
 13 A. It was in relation to communications issues,
 14 yes.
 15 CHAYTOR, Q.C.:
 16 Q. Okay.
 17 MS. MUNDON:
 18 A. In terms of keeping the Department informed,
 19 from a communications perspective.
 20 CHAYTOR, Q.C.:
 21 Q. Okay, and if we could look, please, at P-0428,
 22 page 17 please? This is a story that was
 23 written--it's one of the stories in August--
 24 I'm sorry, in December 2006, I believe, and
 25 it's Stephanie Porter of The Independent.

Page 353

1 "Eastern Health breaks silence on inaccurate
 2 breast cancer results" and on page 19, she
 3 points out--there's a chronology here. I
 4 believe it's on page 19. "December 11th,
 5 2006. For the first time in more than a year,
 6 Eastern Health representatives speak to the
 7 media. A technical briefing is provided, as
 8 well as a tour of the immunohistochemistry
 9 lab." And I believe, in fairness, Eastern
 10 Health may have had, certainly The Current
 11 statement, which we referred to during your
 12 evidence, during that year. But otherwise,
 13 what's being said here, and I think if you
 14 review the media, is that Eastern Health
 15 really hasn't been out speaking on the issue,
 16 on the ER/PR issue.
 17 MS. MUNDON:
 18 A. Yes.
 19 CHAYTOR, Q.C.:
 20 Q. So I'm wondering what is it that you're taking
 21 issue with with Ms. Bonnell during this time
 22 period? How is it that she's not keeping you
 23 informed on communications issues?
 24 MS. MUNDON:
 25 A. I can't remember specifically what the events

Page 354

1 were that would have initiated that meeting.
 2 CHAYTOR, Q.C.:
 3 Q. Yes, but even without that, what is it--if
 4 it's just communications issues that you're
 5 concerned with, there doesn't appear to have
 6 been much in the way of communication from
 7 Eastern Health's perspective on this issue
 8 throughout that year. So was it something
 9 other than communications issues that you were
 10 trying to elicit from Ms. Bonnell?
 11 MS. MUNDON:
 12 A. I can't recall.
 13 CHAYTOR, Q.C.:
 14 Q. I just have one other line of questioning and
 15 then I'll be done, Ms. Mundon, and this
 16 relates to communications plans that we
 17 received from the Government just recently
 18 pertaining to this issue. And if I could
 19 have, please, 1623? And some of those, I know
 20 you're not the author of. There's only one, I
 21 believe, that you are the author of, but I
 22 have some general questions for you in
 23 relation to communications plans because you
 24 could educate us on it, being the only
 25 director of communications we have before us

Page 355

1 right now.
 2 And the first one, this one, 1623, I
 3 believe you are the author of this document.
 4 It's summer communications strategy.
 5 MS. MUNDON:
 6 A. That's correct, yes.
 7 CHAYTOR, Q.C.:
 8 Q. And this one, July 11th 2007, you are the
 9 author. Now a communications strategy plan,
 10 is this done for this specific issue? Like
 11 does each issue have its own communications
 12 plan?
 13 MS. MUNDON:
 14 A. In this particular context, this was a
 15 communications plan that was prepared for to
 16 provide a summary of communication strategy
 17 for the Department of Health for the summer
 18 months. So this would entail certainly more
 19 than one issue. It would be a broad base of--
 20 you know, it would be a communications plan on
 21 all issues related to the Department for the
 22 summer period.
 23 CHAYTOR, Q.C.:
 24 Q. Okay, and so we see here that it's ER/PR and
 25 then there's a gap. So perhaps there were

Page 356

1 other issues included.
 2 MS. MUNDON:
 3 A. Just if I could explain -
 4 CHAYTOR, Q.C.:
 5 Q. Sure.
 6 MS. MUNDON:
 7 A. - what the first heading is.
 8 CHAYTOR, Q.C.:
 9 Q. Sure, tell us.
 10 MS. MUNDON:
 11 A. The first heading of a communications plan is
 12 the public environment and what the public
 13 environment section of a communications plan
 14 is is basically a section in the plan where
 15 you would outline what's happening, from a
 16 communications perspective, from a Health
 17 perspective, in the public and in the media.
 18 So in this public environment section in this
 19 particular plan with summer communications
 20 strategy, it would be a high level summary of
 21 health care issues that would be in the media
 22 at this time, leading into the summer months,
 23 ER/PR being one of them.
 24 CHAYTOR, Q.C.:
 25 Q. Okay, and this is July 11th 2007?

Page 357

1 MS. MUNDON:
 2 A. Yes.
 3 CHAYTOR, Q.C.:
 4 Q. Was there any prior communications plan which
 5 included ER/PR, prior to July 11th 2007?
 6 MS. MUNDON:
 7 A. Not that I'm aware of.
 8 CHAYTOR, Q.C.:
 9 Q. Okay, and so why then in July of 2007 is there
 10 a communications plan around the issue?
 11 MS. MUNDON:
 12 A. Well, it's not--again, it's not a
 13 communications plan around this issue
 14 specifically.
 15 CHAYTOR, Q.C.:
 16 Q. But including that, including the issue.
 17 MS. MUNDON:
 18 A. I guess because of the fact that the Inquiry
 19 had been called, because of the fact that the
 20 class action lawsuit. It was very much out
 21 there in the media at the time this plan was
 22 written, and in the public.
 23 CHAYTOR, Q.C.:
 24 Q. Okay.
 25 MS. MUNDON:

Page 358

1 A. And would be throughout the summer months.
 2 CHAYTOR, Q.C.:
 3 Q. So overall, what's a communications plan
 4 supposed to tell us? What's the purpose?
 5 What's it supposed to do?
 6 MS. MUNDON:
 7 A. Well, in this, in general or in this instance?
 8 CHAYTOR, Q.C.:
 9 Q. Well, I guess is it any different? Is it
 10 different for this instance than it would be
 11 in general?
 12 MS. MUNDON:
 13 A. Yes, it would be. Well, I'll just say, in
 14 general, a communications plan is developed
 15 either to be attached to a Cabinet submission
 16 for government, so in other words to inform
 17 Government from a communications perspective
 18 of the communications considerations with
 19 respect to the decision that would be
 20 recommended in the Cabinet paper. As well, if
 21 there was a major initiative of Government
 22 that Government was leading, for example,
 23 there'd be a communications plan done which
 24 would provide a background. Like the public
 25 environment would talk about what is being

Page 359

1 said in the public at the time. There would
 2 be a section of key messages, where you would
 3 highlight some of your high level messages.
 4 There'd be a section for target audiences or
 5 stakeholders. There'd be communications
 6 objectives. So your objective may be to
 7 communicate to the public on a new initiative
 8 or to reiterate a message that Government
 9 would have or to explain in the public details
 10 around an issue. Those would be examples of
 11 communications objectives.
 12 There would be a section in the plan
 13 called strategic considerations where you'd
 14 highlight some considerations that you may
 15 want to consider as part of the overall plan,
 16 but basically, the communications plan is
 17 meant to provide an analysis, from a
 18 communications perspective, on an issue and to
 19 provide--to outline objectives that you would
 20 want to achieve from communications
 21 perspective and to include some key messages
 22 that you would want to get out there in the
 23 public.
 24 CHAYTOR, Q.C.:
 25 Q. Okay, and that's in general.

Page 360

1 MS. MUNDON:
 2 A. In general.
 3 CHAYTOR, Q.C.:
 4 Q. Okay. Would there also be, not only would you
 5 outline your objectives and then would there
 6 be some action as to how you're going to
 7 achieve those objectives?
 8 MS. MUNDON:
 9 A. Yes.
 10 CHAYTOR, Q.C.:
 11 Q. And would you -
 12 MS. MUNDON:
 13 A. Sorry.
 14 CHAYTOR, Q.C.:
 15 Q. I'm sorry. And then would there be an
 16 evaluation component -
 17 MS. MUNDON:
 18 A. Yes.
 19 CHAYTOR, Q.C.:
 20 Q. - as to how you're going to evaluate -
 21 MS. MUNDON:
 22 A. Exactly, yes.
 23 CHAYTOR, Q.C.:
 24 Q. - whether you've successfully, I guess,
 25 conveyed your message?

Page 361

1 MS. MUNDON:
 2 A. Yes.
 3 CHAYTOR, Q.C.:
 4 Q. Okay. So that's the norm or the general?
 5 MS. MUNDON:
 6 A. That's the norm. In this -
 7 CHAYTOR, Q.C.:
 8 Q. So why is it different here?
 9 MS. MUNDON:
 10 A. Well, in this particular case, it would
 11 certainly follow the same template, but the
 12 purpose of the summer communications strategy
 13 would be very much a proactive communications
 14 plan to try to get some good news
 15 announcements, some positive things out in the
 16 public from a communications perspective, you
 17 know, through the summer months, as an
 18 example. So you know, some initiatives that
 19 Government would have, you know, getting the
 20 Minister out and about the province to let
 21 people know about some of the things
 22 Government was doing, to--you know, for him
 23 to--him or her to speak to Chambers of
 24 Commerce or to have like a calendar of events
 25 where you would suggest perhaps news

Page 362

1 conference on a particular issue, to announce
 2 a program, that sort of thing. That would be
 3 the purpose of the summer communications plan.
 4 CHAYTOR, Q.C.:
 5 Q. Okay. And we certainly see that, I don't know
 6 if we see that necessarily in this plan, but
 7 some of the later plans, for example, the one
 8 for summer, this summer, if we look at 2008,
 9 it's 1670, please? "There is this idea of
 10 pairing good news stories, in particular when
 11 perhaps there is some bad news on the
 12 horizon." Is that a normal communication
 13 strategy or -
 14 MS. MUNDON:
 15 A. I wouldn't say that government would only
 16 communicate good news to try to avoid bad
 17 news.
 18 CHAYTOR, Q.C.:
 19 Q. Right.
 20 MS. MUNDON:
 21 A. I think that it's an important part of
 22 communications of government to be proactive
 23 as well as address issues and that it's an
 24 important part of the job to ensure that the
 25 public is aware of some of the initiatives

Page 363

1 that government has.

2 CHAYTOR, Q.C.:

3 Q. Okay. And actually, it may not be in that

4 one. It's in one here that I saw, I'll show

5 you. I think it's 1624, please? It's in a

6 couple of different places, but in this one I

7 think at page 5. And I realize you're not the

8 author of this document, but I'm just

9 wondering if you could comment on it? And the

10 communications objective here is to balance

11 and mitigate criticism and negative feedback

12 that will undoubtedly be created with the high

13 profile nature of the Cameron Inquiry. And I

14 think in another one, 1668, page 4, says here,

15 "Communication activities related to ER/PR

16 testing and the Commission of Inquiry must be

17 done in concert with strong strategic

18 communications on the department's successful

19 implementation of initiatives and new

20 commitments and investments with a primary

21 goal being the rebuilding of confidence in the

22 health care system. Specific attention will

23 be paid to highlighting the good things that

24 are happening each and every day in health

25 care." So in terms of that, in terms of

Page 364

1 trying to balancing, is that often seen as an

2 important objective in your communications

3 plan, to balance if you know there is some

4 negative news story or some potential for

5 negative news stories, to balance that with

6 good news stories?

7 MS. MUNDON:

8 A. I wouldn't say that that would always be the

9 norm, no. On occasion that may be the case.

10 CHAYTOR, Q.C.:

11 Q. Okay. And is that something, and I realize

12 you weren't involved in this, is that

13 something, though, in terms of putting

14 together a communication strategy that you

15 heard discussed around this issue in the

16 department?

17 MS. MUNDON:

18 A. I'm sorry, can you repeat that?

19 CHAYTOR, Q.C.:

20 Q. Is that, the idea that's reflected here in

21 terms of doing that, is that something you

22 heard discussed within the department in terms

23 of communication strategy around ER/PR?

24 MS. MUNDON:

25 A. Not specific to ER/PR, no.

Page 365

1 CHAYTOR, Q.C.:

2 Q. Okay. Is it something that you've heard

3 discussed with respect to other issues?

4 MS. MUNDON:

5 A. I don't recall any specific occasion where we

6 would have discussed in the department trying

7 to balance that at that point in time, no.

8 CHAYTOR, Q.C.:

9 Q. Okay. And if we could go back, please, then,

10 to the plan that you prepared, 1623? And I

11 think you were telling us generally what you

12 would expect to see in a com plan. And I'm

13 wondering then why it's different for this

14 instance, what is the objective that's being

15 achieved in this instance?

16 MS. MUNDON:

17 A. The objective here?

18 CHAYTOR, Q.C.:

19 Q. Yes, in this document.

20 MS. MUNDON:

21 A. The objective in this communications plan,

22 there would be two or three objectives, but I

23 would say to provide information to the public

24 on new initiatives, to--again, it's difficult

25 to say what they would be without having the

Page 366

1 document in front of me, but to communicate to

2 the public on different initiatives.

3 CHAYTOR, Q.C.:

4 Q. Okay. And is there anything else in general

5 that a communication plan is trying to

6 achieve?

7 MS. MUNDON:

8 A. I don't know, I think I've highlighted most of

9 the things that it would be achieving.

10 CHAYTOR, Q.C.:

11 Q. So I take it it's a tool with you identify who

12 your target audiences are going to be?

13 MS. MUNDON:

14 A. Yes.

15 CHAYTOR, Q.C.:

16 Q. You identify what your objectives will be?

17 MS. MUNDON:

18 A. Yes.

19 CHAYTOR, Q.C.:

20 Q. What your key messages should be?

21 MS. MUNDON:

22 A. Yes.

23 CHAYTOR, Q.C.:

24 Q. And then normally you'd have some way of

25 actioning those objectives?

Page 367

1 MS. MUNDON:
 2 A. Yes.
 3 CHAYTOR, Q.C.:
 4 Q. How to evaluate them?
 5 MS. MUNDON:
 6 A. Yes.
 7 CHAYTOR, Q.C.:
 8 Q. Is there any opinion component as well, any
 9 opinion poll, anything like that, or is that a
 10 different -
 11 MS. MUNDON:
 12 A. That would probably be included in the
 13 evaluation component if there would be public
 14 opinion conducted.
 15 CHAYTOR, Q.C.:
 16 Q. Okay. So sometimes that's included, as well?
 17 MS. MUNDON:
 18 A. Yeah, it may be included as part of the
 19 general public environment. If there was a
 20 poll, that would be part of the overall public
 21 environment. If you take a particular issue,
 22 what the public is saying about it, and of
 23 course, a poll is one way to measure what the
 24 public is feeling about an issue.
 25 CHAYTOR, Q.C.:

Page 368

1 Q. Okay. And while you were still, before you
 2 went on your leave last August, had that kind
 3 of a poll ever been conducted with respect to
 4 ER/PR?
 5 MS. MUNDON:
 6 A. Not that I'm aware, no.
 7 CHAYTOR, Q.C.:
 8 Q. Okay. Ms. Mundon, thank you, very much for
 9 the past two days. Is there anything else
 10 that I haven't covered with you that you think
 11 would be useful for the Commissioner?
 12 MS. MUNDON:
 13 A. No, I think we've covered everything.
 14 CHAYTOR, Q.C.:
 15 Q. Some of my fellow lawyers may have some
 16 questions for you. Thank you.
 17 COMMISSIONER:
 18 Q. It's getting a little late in the day, but I
 19 suggest we do the rounds of the room to see
 20 how long we'll need in the morning. Mr.
 21 Simmons?
 22 MR. SIMMONS:
 23 Q. I expect I'll need an hour.
 24 COMMISSIONER:
 25 Q. Ms. Hennebury?

Page 369

1 MS. HENNEBURY:
 2 Q. I don't think I'll have any questions.
 3 COMMISSIONER:
 4 Q. Ms. O'Dea?
 5 MS. O'DEA:
 6 Q. I won't have any questions, Commissioner.
 7 MS. NEWBURY:
 8 Q. I'll be about five or ten minutes.
 9 COMMISSIONER:
 10 Q. All right.
 11 MS. TAYLOR:
 12 Q. Probably about the same, five or ten minutes.
 13 COMMISSIONER:
 14 Q. Mr. Pike?
 15 MR. PIKE:
 16 Q. (Unintelligible).
 17 COMMISSIONER:
 18 Q. All right then. Mr. Pritchard?
 19 MR. PRITCHARD:
 20 Q. I think I'm going to try (unintelligible).
 21 COMMISSIONER:
 22 Q. Okay then, I suggest we judge ourselves
 23 accordingly in terms of scheduling the witness
 24 who is to start in the morning.
 25 CHAYTOR, Q.C.:

Page 370

1 Q. Okay.
 2 COMMISSIONER:
 3 Q. So I'm afraid I have to ask you to return in
 4 the morning, but it looks like it's not going
 5 to be for a lengthy period of time.
 6 MS. MUNDON:
 7 A. Okay.
 8 COMMISSIONER:
 9 Q. Thank you. Oh, I'm sorry, I've forgotten
 10 again. There are envelopes which will be
 11 available to counsel or parties with standing.
 12 Upon conclusion at 4:52 p.m.
 13

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21

CERTIFICATE

I, Judy Moss, hereby certify that the foregoing is a true and correct transcript in the matter of the Commission of Inquiry on Hormone Receptor Testing, heard on the 17th day of June, A.D., 2008 before the Honourable Justice Margaret A. Cameron, Commissioner, at the Commission of Inquiry, St. John's, Newfoundland and Labrador and was transcribed by me to the best of my ability by means of a sound apparatus.

Dated at St. John's, Newfoundland and Labrador this 17th day of June, A.D., 2008

Judy Moss

Inquiry on Hormone Receptor Testing

<p style="text-align: center;">-&-</p> <hr/> <p>& [4] 282:1,5,24 288:2</p> <hr/> <p style="text-align: center;">-?-</p> <hr/> <p>'07 [1] 206:23</p> <hr/> <p style="text-align: center;">---</p> <hr/> <p>-at [1] 32:15 -I [1] 58:16 -you're [1] 45:7</p> <hr/> <p style="text-align: center;">-0-</p> <hr/> <p>0104 [1] 92:2 0189 [1] 158:13 0196 [2] 25:21 34:17 0238 [1] 330:24 0279 [1] 116:1 0825 [1] 156:11 0826 [1] 157:12 0845 [1] 229:9 0857 [1] 237:3 0955 [1] 314:19 0995 [1] 338:5</p> <hr/> <p style="text-align: center;">-1-</p> <hr/> <p>1 [1] 338:16 10 [4] 80:22 81:20 219:4 233:15 1000 [1] 57:13 103 [1] 249:11 105 [1] 249:13 10:17 [1] 40:6 10:18 [1] 239:8 10:35 [1] 121:9 10:36 [1] 26:5 10:41 [1] 239:13 10th [1] 159:2 11 [2] 62:25 65:15 117 [15] 18:17 20:2,20 24:23 25:14 37:14 52:11 56:25 57:24 64:16 95:3 98:5 156:18,21 193:22 11:11 [2] 34:20 36:2 11:13 [1] 281:6 11:32 [1] 242:14 11th [16] 7:7,10 8:3,11 10:25 34:7 36:20 37:13 37:17 157:23,25 162:14 353:4 355:8 356:25 357:5 12 [8] 62:20 63:24 65:17 66:17,20 70:16 71:3 107:17 1225 [1] 206:20 1233 [1] 248:17 1262 [1] 311:4 12:27 [1] 221:6 12:30 [2] 107:17 229:13 12:34 [1] 70:16</p>	<p>12:37 [1] 222:20 12:40 [3] 105:14 107:3 107:21 12:43 [1] 222:17 12:45 [1] 107:23 12th [16] 54:17 58:11 59:8,10 63:4 88:22,24 93:5 99:8 105:14 113:17 114:6 119:19 325:22 328:19 331:9 13th [1] 330:25 1454 [1] 26:1 1455 [1] 37:8 15 [6] 80:22 81:16,20 120:24 281:6 344:19 1518 [1] 336:23 15th [8] 121:9 126:2 132:5 139:8,22 146:13 146:14 155:20 16 [3] 8:21,24 195:1 1613 [1] 212:4 1615 [1] 297:3 1616 [1] 307:2 1620 [1] 328:18 1623 [3] 354:19 355:2 365:10 1624 [1] 363:5 1668 [1] 363:14 1670 [1] 362:9 16th [8] 150:10 156:1,14 158:5 166:25 168:17 173:13 185:15 17 [2] 1:4 352:22 17th [14] 166:20 173:13 178:16 180:15,16 185:12 185:18 186:10 188:19 195:25 203:10 333:21 371:9,17 18th [12] 196:4 203:7 206:23 212:11 221:6 222:17 223:9,22 225:25 229:10,21 231:22 19 [2] 353:2,4 1997 [3] 18:11 56:23 344:17 19th [3] 4:16 132:2 237:4 1:05 [5] 296:4 297:23 304:1,16,22 1:30 [5] 35:1 71:4 107:3 304:2,12 1st [2] 313:20 316:5</p> <hr/> <p style="text-align: center;">-2-</p> <hr/> <p>2 [1] 219:4 20 [3] 12:16 19:5 206:21 2003 [3] 294:22 297:14 312:12 2005 [4] 18:11 240:25 324:24 347:25 2006 [38] 4:16,23 8:3 25:17 34:7 37:17 45:13 55:6 60:23 70:16 71:3 105:14 132:5 141:6 144:23 148:13,16,19</p>	<p>152:1 157:23,25 159:2 161:5 166:9 189:17 190:18 193:6 194:12 235:18,19 241:3 247:6 247:15 252:23 307:8 310:10 352:24 353:5 2007 [67] 10:22 24:11 51:15 53:12 55:7 56:9 58:7 60:9,12,22 113:14 114:22 115:1 116:10 118:14 119:14,21 126:2 126:4 132:2 137:3 138:2 139:2 156:14 176:4 177:12 178:17 182:10 183:7 184:6 185:3 189:25 192:9 194:7,13 203:10 213:23 219:24,25 220:15 221:6 222:17 231:23 247:2,5,16 252:14 253:2 254:2 259:13 265:9 277:24 288:25 294:11 317:12 325:23 328:19 331:9 333:21 334:9 336:24 339:8 348:1 355:8 356:25 357:5,9 2008 [4] 1:4 362:8 371:9 371:17 20th [1] 281:11 21st [6] 138:2 239:7 247:2 248:21 254:2 327:13 22 [2] 265:9 345:1 22nd [6] 21:16 43:9 54:6 272:15 317:12 321:17 23 [1] 69:21 23rd [25] 11:14 12:2,18 16:22 18:24 20:10 23:5 39:21 44:18 49:19 95:4 95:25 96:25 97:22 128:18 129:11 147:14 148:19 161:10,20 162:2 164:5 264:17 277:23 279:8 24th [2] 281:24 288:25 2700 [1] 98:5 2760 [3] 18:11 20:2 95:3 27th [1] 52:7 28 [1] 344:21 29th [1] 334:8 2:00 [4] 296:3 304:14 311:4,22 2:18 [1] 180:16 2:52 [1] 225:25</p> <hr/> <p style="text-align: center;">-3-</p> <hr/> <p>3 [2] 2:3 52:2 30 [8] 15:13 19:5 24:7,16 24:16 92:22 334:12 344:24 3000 [1] 56:23 30th [2] 307:8 310:10 31st [8] 294:11 297:3 303:4 304:6,16 307:3 311:5,22 370 [1] 2:3 39 [1] 281:4 3:34 [1] 247:2</p>	<p>3:50 [1] 248:22 3rd [1] 336:24</p> <hr/> <p style="text-align: center;">-4-</p> <hr/> <p>4 [2] 18:1 363:14 40 [3] 80:3,7,8 41 [1] 4:19 42 [3] 56:14,17 139:15 44 [1] 273:10 4:08 [1] 321:1 4:38 [1] 322:5 4:52 [1] 370:12 4th [5] 5:13 7:8,9 12:9 13:1</p> <hr/> <p style="text-align: center;">-5-</p> <hr/> <p>5 [1] 363:7 50 [1] 3:10 5:06 [1] 229:10 5th [4] 113:14 116:10 118:14 126:4</p> <hr/> <p style="text-align: center;">-6-</p> <hr/> <p>6 [2] 10:2 20:18 6:36 [1] 232:4 6th [4] 321:1 322:13 323:11 339:7</p> <hr/> <p style="text-align: center;">-7-</p> <hr/> <p>7 [1] 57:8 709 [2] 229:12,25 7:09 [1] 196:10 7:30 [1] 198:4 7:35 [1] 254:3 7th [3] 324:9 338:7,8</p> <hr/> <p style="text-align: center;">-8-</p> <hr/> <p>8 [4] 131:25 197:25 198:5 344:13 887 [1] 281:1 8:24 [2] 63:24 64:8 8:52 [1] 8:3 8th [1] 338:7</p> <hr/> <p style="text-align: center;">-9-</p> <hr/> <p>9 [4] 131:25 149:11 196:24 198:9 900 [1] 56:24 939 [2] 18:12 95:3 9:00 [2] 18:2 201:1 9:06 [1] 203:7 9:11 [1] 37:13 9:13 [1] 63:24 9:25 [1] 206:23 9:38 [2] 116:10 324:9 9:50 [1] 25:22 9:52 [1] 212:11 9th [4] 116:23 119:21</p>	<p>161:4,5</p> <hr/> <p style="text-align: center;">-A-</p> <hr/> <p>A's [1] 275:23 A.D [2] 371:9,17 a.m [13] 34:20 36:2 116:10 196:10,24 198:10 203:7 206:23 212:11 229:16 239:8,13 282:3 Abbott [50] 4:17 5:15 13:9 28:18 49:1 63:22 118:6 121:7 127:7,23 130:14 131:21 138:3 140:21 153:9 155:11 173:23 174:5 176:13 178:24 226:2 232:3 239:7 239:17,22 241:24 248:19 250:1,9 253:22 254:2 255:14,25 257:7 258:9 264:6 267:19,24 270:18 271:13 272:1,1 276:21 281:23 301:9 307:14,19 306:11 307:22 308:16 Abbott's [3] 152:21 308:1,3 ability [2] 196:18 371:13 able [15] 43:23 47:18 93:6 97:17 128:22 134:11 135:22 178:11 198:21,22 201:21 215:17 325:6 340:22 345:25 absolutely [2] 99:18 147:22 accepted [1] 7:2 access [10] 112:6 121:12 124:4,20 144:13 147:19 329:4 334:21 335:12 337:5 according [1] 322:15 accordingly [3] 121:21 212:21 369:23 accountable [1] 236:19 accuracy [1] 290:9 accurate [11] 256:25 258:10 264:5 271:16,21 272:3 275:2,5 322:21 343:3 349:4 accurately [1] 350:18 achieve [3] 359:20 360:7 366:6 achieved [1] 365:15 achieving [1] 366:9 acknowledge [5] 40:9 47:23 58:4 164:18 194:7 acknowledged [2] 164:19 268:4 acknowledgement [1] 288:2 acknowledges [2] 159:25 160:6 acknowledging [3] 25:22,23 48:10 Act [2] 173:18 174:20 Acting [1] 316:19 action [15] 1:13 4:20,22</p>
---	--	---	--	---

<p>4:25 5:5,9 52:8 57:5 61:4 124:22 151:19 186:19 209:13 357:20 360:6 actioning [1] 366:25 activities [1] 363:15 actual [3] 123:1 187:1 292:5 ad [16] 277:25 278:5,10 279:1,18 280:14 281:8 281:11,13 313:21,22,23 314:13,20 316:15 317:1 add [4] 84:19 134:3,8 202:18 added [3] 85:17 101:4 137:13 adding [1] 133:22 addition [3] 85:21,23 214:1 additional [4] 256:23 266:22 277:5 325:14 address [4] 68:25 283:2 349:13 362:23 addressed [5] 13:2 21:22 22:3 171:19 209:19 adequate [1] 65:9 ADM [3] 109:15 136:14 136:17 advance [3] 80:13 147:23 337:8 advanced [1] 196:18 advertisement [1] 278:3 advice [6] 144:24 268:18 317:20 319:6 320:8,13 advise [8] 116:22 118:23 121:21 123:16 221:8 317:9 320:17 340:4 advised [2] 161:15 300:19 advisor [1] 221:4 affected [6] 21:18 257:14 272:19 279:24 317:15 318:25 affects [1] 331:13 affidavit [22] 56:13 124:20,21 125:2,7,13,16 132:4,8 140:6,15 144:9 147:18 152:10 154:13 249:11,15 251:5,13,25 252:8,13 affirmation [1] 314:22 afforded [1] 174:18 afraid [1] 370:3 aftermath [2] 141:25 142:1 afternoon [18] 30:5 34:23 59:10 110:2 121:11 156:13 166:22,24 167:5 180:15 185:8,11 219:17 219:20 225:24 286:6 288:19 296:3 afterwards [3] 47:6 113:15 273:4 again [93] 12:24 14:3 20:19,25 21:1 22:8 36:4 37:3 39:5,13 41:18 42:24</p>	<p>43:2,7 44:3 45:14 46:3 46:21,22 55:3 57:9 63:21 65:7 66:11 69:19 70:1 75:20 76:7 78:20 79:11 89:9 92:19 97:25 101:3 112:6 114:22 128:14 134:20 135:5 136:8 142:14 146:20 150:2 158:20 162:8,19,21 177:10 190:2 195:15 196:15 200:19 204:2 206:13 211:24 218:17 220:5 225:25 227:18 229:10 246:25 256:21,23 258:9 259:7 262:4,5,20 264:2 270:18,21 271:13 274:9 275:13 281:1 290:11 293:12 309:20 311:3 317:25 320:20 321:4,12 322:20,23 325:22 341:10 343:21 344:13 349:6 357:12 365:24 370:10 against [1] 57:6 ago [4] 60:15 177:11 253:6 298:9 agree [3] 42:8,14 148:11 agreed [2] 334:11 344:23 ahead [1] 215:10 al [1] 1:9 alarm [1] 50:1 alarming [1] 35:22 alert [2] 46:8 126:19 alerted [3] 43:8 94:17 163:11 allow [4] 25:7 91:18 93:1 132:20 almost [11] 45:16 56:22 113:13 143:10 156:15 159:7 167:9 198:5 243:22 288:5 341:15 along [18] 52:22 74:9 83:25 165:8 171:25 172:20 178:20 179:17 203:8 208:12 229:18 232:8 247:13 260:19 266:10 313:21 317:21 328:10 always [9] 82:3 83:8 101:18 118:3 304:12 318:20,22 319:1 364:8 among [1] 155:5 amount [1] 57:3 analysing [1] 342:5 analysis [5] 249:22 338:22 341:4,7 359:17 analyze [1] 238:5 analyzed [1] 98:1 anchor [1] 223:24 Andre [1] 327:15 Andrea [3] 69:25 70:1 265:8 announce [3] 244:14 254:8 362:1 announcement [1] 271:3</p>	<p>announcements [1] 361:15 announcing [2] 255:21 268:8 annoyed [1] 15:8 answer [48] 15:20 23:17 25:15 39:15 43:4,23 44:2 44:5,13,15,18,22 45:2 66:12,13 67:6,9,14 68:23 69:20 79:6 90:23,25 91:14,17 96:7,13,23 97:8 97:18 116:19 132:1 134:11,13 142:17 157:3 178:11 194:8 205:19 210:7,19 211:15 218:18 218:22 219:23 240:21 280:18 350:19 answered [9] 43:14 94:24 95:23 97:6,10 191:13 209:21 239:5 248:25 answering [3] 43:24 189:1 239:16 answers [12] 57:15 64:22 93:4 115:20 183:6 194:9 211:10 238:1,2 261:19 275:25 350:20 anticipated [6] 90:4,14 93:21 132:10 135:8,11 anticipating [1] 333:14 anyhow [1] 127:15 anyway [1] 152:10 apart [1] 149:17 Apologizes [1] 232:5 apology [4] 152:12 267:13,16,19 apparatus [1] 371:14 appeal [1] 336:9 appear [1] 354:5 Appearances [1] 1:5 appeared [1] 126:20 apprised [2] 79:2 88:14 approach [3] 115:14 225:4,10 approaches [1] 87:7 appropriate [3] 18:17 24:23 144:2 appropriately [1] 190:6 approval [4] 264:8 266:23 275:18 277:3 approve [2] 136:18 276:18 approved [4] 71:2 186:6 266:20 285:2 April [1] 132:2 area [1] 178:22 argument's [1] 73:13 arise [5] 59:22 84:1,18 85:5 88:11 arisen [1] 316:12 arises [1] 65:25 arm's [2] 233:21 348:20 arms [6] 233:13,17 234:10 235:6 236:9 237:1</p>	<p>arose [1] 86:9 arrange [1] 159:15 arranged [2] 229:12,25 arrangements [3] 184:19 221:12 230:10 arranging [2] 186:20 221:11 article [16] 44:8,24 50:3 50:7,10 52:23 58:4,13 59:24 60:13 61:2 113:6 282:23 327:15,23 328:10 articles [7] 51:19,21,23 61:19 111:1 112:8 142:10 articulate [1] 103:15 articulated [1] 52:24 ASAP [10] 105:20 109:4 116:22 118:23 180:20,21 221:8 242:20 244:3 249:6 aside [1] 84:8 asks [2] 78:9 125:25 Assembly [27] 34:23 59:4 71:24 73:2,22 74:23 78:7 85:6 86:2 87:19 88:16 89:5 94:3 99:6 101:12 102:5 105:18,25 109:6 116:11,13,17 118:8 135:20 180:21 294:20,24 assess [4] 84:19 86:2 101:22 237:11 assessed [4] 85:12 88:12 119:24 120:6 assessing [1] 103:20 assessment [2] 88:18 115:16 assigned [1] 132:18 assist [4] 97:17 168:11 170:15 339:7 assistance [3] 167:14 169:6,8 assistant [6] 61:25 62:10 136:11 228:8 266:9 275:17 assisted [1] 169:13 assisting [2] 214:8 277:21 associated [2] 121:15 139:16 Association [1] 1:14 assume [22] 45:15 75:11 90:10 102:11 110:6 122:3 186:25 188:21 190:22 209:23 231:14 282:12 295:13 298:21 301:20 307:17 315:6 318:10 325:3 330:1,12 344:9 assumed [3] 150:6 225:2 225:12 assuming [7] 75:24 82:2 102:19 191:25 281:11 295:18 346:14 assumption [1] 148:21 assurance [1] 52:17 assurances [1] 320:5 ATIPP [2] 338:9 340:16 ATIPPA [19] 121:22</p>	<p>325:21 328:20,22 330:10 331:3,6,8,10 332:10,11 332:22 333:2,23,24 334:6 344:13,15 346:18 attach [1] 117:18 attached [12] 26:6 97:23 99:11 116:20 233:11 265:10 277:25 313:21 334:4 338:15 345:2 358:15 attachment [1] 70:25 attempt [3] 261:13,20 342:2 attend [12] 29:4,11,17 155:21 199:10,15 213:17 213:21,23,25 221:18 228:19 attended [3] 29:21 213:19 246:15 attention [24] 6:10 7:2 25:17 40:25 50:8 51:5 61:13 64:13 71:10 101:7 102:15 103:5,18 104:10 129:12 160:16 176:13 194:18,22 226:17 263:18 307:5 316:16 363:22 attract [1] 102:14 attributed [2] 18:9 38:24 audiences [2] 359:4 366:12 August [8] 336:24 338:7 338:8 339:7 344:13 347:13 352:23 368:2 author [6] 327:23 354:20 354:21 355:3,9 363:8 authorities [8] 1:18 204:10 260:5 289:1,20 289:22 290:20 349:12 authority [7] 1:11 22:11 201:15 291:5,12 336:12 351:2 authority's [1] 294:5 available [5] 154:10 156:23 168:11 212:17 370:11 avoid [1] 362:16 aware [70] 27:15 36:15 40:19 42:2,4,6 51:16 55:8 58:16 67:14 73:25 74:1 75:18,19,20 86:10 86:15 89:4,16 94:19 103:24 104:5 125:7,10 125:22 128:25 129:2 131:4 147:23 156:7 166:19 170:23 176:21 178:14 183:18,21 187:1 190:16,22 191:22 213:1 214:3 222:3 225:20 235:19 241:1 242:5 245:21 246:14 260:12,14 260:16,22 274:3,9 276:17 284:13 286:19 287:7 298:12 306:11 308:16 328:16 336:9,16,21 343:10 357:7 362:25 368:6 awareness [1] 191:14</p>
--	---	---	---	---

<p>away [7] 34:2 52:15 228:22 229:5 243:9,20 245:24</p> <p>awfully [1] 65:4</p> <hr/> <p style="text-align: center;">-B-</p> <hr/> <p>background [7] 96:3 143:17 168:10 172:2 256:4 310:24 358:24</p> <p>backgrounder [14] 254:8,15 255:20 260:19 260:20 263:25 273:15 274:25 275:9 317:11,13 318:3 320:23 321:15</p> <p>bad [2] 362:11,16</p> <p>balance [5] 16:15 363:10 364:3,5 365:7</p> <p>balancing [1] 364:1</p> <p>Banerjee [2] 307:7 306:12</p> <p>Barnes [1] 265:7</p> <p>Barrington [4] 34:19 35:3 36:19 213:10</p> <p>base [1] 355:19</p> <p>based [7] 49:18 136:9 192:18 200:19 262:3,20 317:25</p> <p>basis [5] 87:3 103:15 104:8 111:1 350:7</p> <p>bearing [1] 65:15</p> <p>became [3] 98:6 240:25 287:7</p> <p>become [5] 17:11 73:20 124:6 144:10 286:13</p> <p>becomes [3] 82:7 142:14 219:12</p> <p>beforehand [2] 141:12 236:15</p> <p>beg [1] 205:9</p> <p>begin [1] 219:8</p> <p>beginning [5] 9:19 81:22 82:23 85:13 337:1</p> <p>begins [2] 231:24,25</p> <p>behalf [3] 228:8 307:4 311:6</p> <p>behind [1] 107:22</p> <p>belabour [1] 62:18</p> <p>belated [1] 37:16</p> <p>belief [1] 261:21</p> <p>believes [2] 261:12,20</p> <p>believing [1] 320:2</p> <p>below [4] 80:25 174:4 265:11 331:5</p> <p>benefit [1] 159:13</p> <p>Bernard [1] 1:6</p> <p>best [4] 41:19 100:17 320:8 371:13</p> <p>better [1] 78:20</p> <p>between [15] 27:3 28:12 40:16 121:6 180:14 216:18 217:14 231:21 234:5 246:25 329:16 337:3 349:2,10 351:2</p>	<p>beyond [1] 228:15</p> <p>bid [1] 4:20</p> <p>big [1] 77:19</p> <p>biggest [1] 85:19</p> <p>bind [1] 197:21</p> <p>binder [15] 10:20,20 53:15 60:5,8 73:8 87:20 116:17 117:4 325:19,23 326:1,3,13,15</p> <p>Birthday [2] 3:11 4:3</p> <p>bit [5] 4:15 87:20 155:15 197:21 275:24</p> <p>Blackberry [4] 239:13 245:5,9 247:1</p> <p>Blair [1] 1:16</p> <p>blame [2] 132:18 133:24</p> <p>blank [2] 84:12,17</p> <p>blocked [1] 117:21</p> <p>board [1] 337:13</p> <p>Bonnell [135] 5:14,21 7:9 8:1 18:2 25:25 34:19 35:4 36:19 47:2,16 63:16 114:17 121:10,25 123:11 123:17 124:1,14,17 125:3 134:17 142:20,25 143:21 144:21 145:7,13,18 146:1 146:18 147:8 148:1,11 148:24 150:11 156:13 157:5,19 158:19,24 160:2 165:9 166:4 167:4,13 168:9 180:9,15,16 181:14 181:15,22 182:1 183:12 188:19 196:5,13 197:16 203:6,9 206:22 207:7 208:23 213:9,9 216:19 217:12,15 222:17 223:1 223:14 224:19,25 226:1 226:8,13 227:10,13 230:1 232:2,24 242:16 243:12 244:23 247:1 248:19 252:3 281:22,25 286:14 286:15,19 287:11,17,21 294:11 296:4 298:7 299:2 300:3,12,15 301:4,10,12 301:22 303:3,16 304:6 304:22 313:19 315:19,21 316:4 318:21 322:7,12 322:18 323:2,11,25 324:8 325:1 327:16 336:24 337:20 338:3 345:4,20 345:24 352:1,8 353:21 354:10</p> <p>Bonnell's [5] 145:4 157:13 217:12 287:2 346:14</p> <p>book [6] 77:6 82:13 83:5 83:6 85:4,17</p> <p>bother [2] 78:2 259:2</p> <p>bottom [5] 37:9 231:24 236:18 245:4 261:12</p> <p>Boy [1] 85:18</p> <p>Bradbury [1] 116:8</p> <p>branch [2] 230:11 325:21</p> <p>break [10] 120:19 126:5 145:19 212:7 219:4,6,13 286:6 288:17,19</p> <p>breakdown [1] 21:12</p>	<p>breaking [1] 146:9</p> <p>breaks [2] 147:21 353:1</p> <p>breast [16] 1:12 4:20 57:24 64:15 65:5,7 105:19 138:4,9 159:9 226:4 227:4 262:12 265:15 324:21 353:2</p> <p>Brian [3] 265:8 328:23 328:23</p> <p>brief [1] 187:21</p> <p>briefed [1] 348:24</p> <p>briefing [268] 7:6,16 8:6 10:25 11:12,13 19:23 20:7,9 21:11,13 22:25 23:24 29:4 31:14,19 32:18,22 33:1,5,16,20 36:3 37:13 39:16 44:1 44:18,23 46:23 51:14 54:1,20 63:1,16,17 66:19 67:3,5,6 69:3,21 70:17 70:24,25 72:4,7,8,12 74:9,17 75:12,14 78:12 79:19 80:7 83:12 85:4 86:12 87:14,19,25 88:6 88:16 89:6 91:13 93:5,9 93:13,17,20 94:13 95:4 95:7,11 96:18,25 97:22 97:23,24 98:3,10,16,20 98:25 99:8 100:5 101:14 102:1,3 104:9,12 105:18 105:24 106:1,3,3,22 107:1,8,16 108:1,5,6,10 108:16 109:25 110:4 111:7,18,20 114:5 116:11 116:13,16,17,21,25 117:4 117:11 118:22 119:3,5 125:11 126:3,11 128:12 129:12 132:1,2,3,11 134:23 135:2,13 136:10 136:19 140:11 141:11 142:1,7 148:18 150:7 151:25 152:3 156:15,19 163:5,15 164:4 166:20 167:16,21 168:10 170:10 178:17 180:17,24 182:5 182:5,9,19,24 183:12 184:4,20 185:1,18 186:1 186:20,23 187:5,10 188:1 189:17,23 190:3 191:15 196:6,12,25 197:3 199:21 200:1 201:2,5,11 202:19 203:7,8,9,12,24 204:5 204:21 205:4,23 207:13 209:21,24 211:1 212:11 212:12,13,16,18,22 213:1 213:6,17 214:4 215:1,10 216:16 218:8 221:9,12 221:14,24 222:1,3,14 223:3,9,21 224:15,15 225:21 227:18,24 228:1 228:10,13,13,15 229:2,6 229:18,20 231:5 239:10 239:14 240:7 241:2 242:18 243:5 244:18 246:16,16 247:7,12,20 258:6 259:12,19,19 262:25 263:5 264:19,21 271:17 310:15,20,25 321:14 326:19,21 329:12 353:7</p> <p>briefings [7] 34:21 35:6</p>	<p>36:21 109:14 188:8,11 326:23</p> <p>bright [1] 196:10</p> <p>bring [5] 14:23 104:10 107:7 112:18 160:16</p> <p>bringing [4] 103:4 226:17 292:24 316:16</p> <p>brings [1] 312:11</p> <p>Bristol [3] 203:1 207:20 214:8</p> <p>broad [1] 355:19</p> <p>broke [5] 55:7 56:9 139:2 139:9 145:24</p> <p>broken [2] 81:2 150:14</p> <p>Brophy [4] 221:1,2,11 228:8</p> <p>brought [16] 6:9 7:1 26:21 27:18 129:12 164:5 176:13 194:17,21 289:20 291:16 292:11 307:5,12 309:1 312:2</p> <p>budget [1] 188:12</p> <p>bullet [3] 132:3,15 262:9</p> <p>bunch [1] 52:3</p> <p>buried [5] 143:18,18 149:4,10 193:10</p> <p>Burin [5] 244:8,12 349:21 350:23 351:11</p> <p>Burrage [1] 265:7</p> <p>business [2] 3:9 76:8</p> <p>Bussey [1] 159:4</p> <p>busy [2] 8:22 16:8</p> <hr/> <p style="text-align: center;">-C-</p> <hr/> <p>Cabinet [28] 31:3,11 87:12 166:20 167:15,21 168:10 172:22 174:1,3 178:17,22,25 179:2,10 179:16 183:18 186:1,18 186:23 187:5,10,12,13 327:6 330:1 358:15,20</p> <p>Cabinet's [1] 185:17</p> <p>calculation [1] 128:22</p> <p>calendar [1] 361:24</p> <p>Cameron [3] 1:3 363:13 371:10</p> <p>Canadian [2] 1:15 57:18</p> <p>cancelled [1] 281:3</p> <p>cancer [21] 1:12,15 4:20 37:15 43:3 57:1,18,24 64:15 65:5,7 105:19 159:9 222:23 227:4 232:6 262:12 265:16 318:12 324:21 353:2</p> <p>cannot [2] 65:2 138:6</p> <p>capacity [1] 228:14</p> <p>care [7] 25:13 64:24 236:20 237:17 356:21 363:22,25</p> <p>Carmel [1] 222:19</p> <p>Carolyn [3] 56:21 57:16 57:23</p> <p>carrying [1] 32:16</p> <p>case [25] 59:21 74:16 83:6</p>	<p>83:7,7 88:10,21,21 91:9 91:9 95:22 101:19 103:24 110:6 148:25 157:22 190:7 220:23 228:7 315:24,25 319:13 342:1 361:10 364:9</p> <p>cases [4] 18:15 113:7 120:5 311:1</p> <p>casually [1] 86:24</p> <p>catch [2] 48:15 51:5</p> <p>categorized [1] 81:4</p> <p>Cathy [1] 286:10</p> <p>caucus [1] 296:20</p> <p>caused [7] 32:13,15 44:21 50:1 104:16 134:7 218:14</p> <p>CBC [13] 4:19 37:18 52:4 57:8 113:3 139:3 294:13 301:13,18 302:8 304:21 304:22 305:1</p> <p>CBC's [1] 139:5</p> <p>CD [1] 53:13</p> <p>cell [7] 239:12 242:21,22 242:24 244:24 245:7,11</p> <p>Central [1] 1:17</p> <p>Centre [1] 58:3</p> <p>CEO [3] 207:18 248:24 334:5</p> <p>certain [14] 12:23 54:6 65:8 75:16 93:12 153:25 154:3 193:7 194:9 281:12 318:24 350:21,22,24</p> <p>certainly [67] 6:8 13:8 14:16 17:20 18:21 19:19 20:14 22:15 23:5 31:25 32:6,12 33:1,10 34:2 35:18 36:17 41:1,13,20 48:6 49:23 50:3 51:21 51:23 58:5 64:13 84:7 87:10 89:3 97:11 102:12 110:6 112:8 128:18 129:1 138:15 140:10 142:19 150:1 153:24 155:5 161:13,14 182:12 184:22 185:1 194:18 199:8 211:13 214:2 226:17 228:21 243:23 245:23 253:8,21 259:13 260:22 275:4 290:16 304:1 323:21 324:4 353:10 355:18 361:11 362:5</p> <p>Certificate [2] 2:4 371:3</p> <p>certify [1] 371:6</p> <p>chair [1] 337:12</p> <p>challenging [1] 274:24</p> <p>Chambers [1] 361:23</p> <p>chance [1] 173:7</p> <p>change [24] 19:16 25:13 73:15 82:12 160:3 161:3 162:9 163:22,25 164:16 164:22 257:18,21,22,23 264:15,16 272:17 279:23 280:2,8 349:18 351:7,8</p> <p>changed [21] 19:1,18 21:19 25:3 57:21 101:1 156:22 160:7 161:9,14 161:16 162:6,19,21,23</p>
---	--	--	--	--

<p>163:17 189:3 193:21 247:6 279:23 350:12 changes [21] 18:18 20:21 24:23,24,25 52:12 156:18 163:8,10 164:15,18,20 194:12 200:9,22 201:18 202:7 248:7,10 272:16 273:21 channel [1] 87:20 channels [1] 102:21 charge [1] 291:19 chart [1] 345:1 Chaytor [1037] 1:7 2:3 3:2,3,7 4:2,6,8,12 5:3,11 5:18 6:2,11,21 7:4,14,19 7:24 8:9,16 9:3,8,13,18 9:22 10:1,5,14,24 11:5 11:25 12:5,12 13:5,10 13:21 14:9,18,22 15:1,7 15:12,21 17:23,24 18:7 19:8,24 20:8,17 21:14 21:25 22:8,18 23:14 24:6 24:15 25:20 26:14,23 27:2,11,16,21 28:1,6,11 28:17,23 29:3,7,15,20 29:24 30:11,18,23 31:2 31:7,17 32:2,8,20 33:4 33:12,22 34:4,12,16 35:2 35:9,13,25 36:11,16,24 37:7,22 38:3,22 39:10 39:18 40:1,5,13,20 41:3 41:12,22 42:3,7,12 43:6 43:12,17,21 44:7,25 45:5 45:19,25 46:6,13 47:4,9 47:15,22 48:1,8,22 49:4 49:9,14 50:9,19,24 51:4 51:9,13,18 52:1 53:4,23 54:4,12,16,24 56:18 58:9 58:21 59:7,11,16,20 60:4 60:10,19 61:1,21 62:1 62:16,23 63:5,9,19 64:5 64:11 65:24 66:5,15,24 67:4,10,15,21 68:4,10 68:20 69:5,13,22 70:6 70:11,15 71:8,15,20,25 72:5,15,19,23 73:9,18 74:3,13,18 75:1,8,13 76:4 89:9,10,15,21 90:3 90:11,17 91:1,5,22 92:1 92:7,13,21 93:18 94:7 94:22 95:12,19 96:4,8 96:17,22 97:4,15 98:8 98:15,22 99:7,15,21 100:3,9,15,21,25 101:8 104:23 105:5,13 106:10 106:20 107:9,13,18,24 108:4,13,21 109:7,22 110:8,14,21 111:4,19 112:2,11,17 113:1,8,22 114:1,10,15,20,25 115:12 115:18,25 116:6 117:6 117:19 118:1,13,17 119:6 119:12,17 120:1,8,16,21 121:2,3 122:9,19,24 123:4,9,14,22 124:7,16 124:25 125:6,14,19,23 126:10,17 127:3,8,14,21 128:1,6,13 129:4,10,16 129:23 131:24 132:14 133:1,9 134:1,9,15 136:24 137:6,17,24</p>	<p>138:21 139:4,20,25 140:16,24 141:4,9,18,22 142:4,12,22 143:20 144:15,20 145:3,11,17 146:10,17,23 147:3,7,25 148:5,10 149:9,15 150:9 150:19,23 151:2,6,10,16 152:15,20,25 153:7,12 153:18,22 154:18,24 155:6,12,18,24 156:6,10 157:9,17 158:3,11,18,23 159:22 160:9,14,21 161:1 161:8,18,25 162:12,17 162:25 165:7,16 166:1,7 166:12,18,23 167:3,8,12 167:24 168:7,15,22 169:1 169:12,17,21 170:2,9,14 170:20 171:2,9,16,24 172:3,8,12,23 173:11,19 173:24 174:6,11,16,24 175:4,9,17,22 176:3,7 176:11,16,23 177:3,9,15 177:22 178:3,9,15 179:1 179:5,9,14,20,25 180:4 180:8,12 181:2,9,13,21 182:6,13,25 183:10,17 183:22 184:5,11,15 185:2 185:10,14,19,23 186:8 186:13,21 187:3,8,15,19 187:25 188:5,17,25 189:9 189:13,18 190:8,14,23 191:5,10 193:4,18 194:1 194:5,20 195:6,12,17,21 196:3,9 197:4,9,15,20 198:1,6,11,24 199:9,14 199:19,24 200:4,8,12,16 200:24 201:6,12,20 202:1 202:10,15,25 203:4,18 203:22 204:4,9,13,17 205:1,22 206:1,5,10,15 206:19 207:11,23 208:2 208:6,11,16,21 209:3,9 210:1,11,18,23 211:2,9 211:14,20 212:3,6,8 213:4,11,16,20 214:5,11 214:16,22 215:3,8,19 216:1,7,17,23 217:3,8 217:13,19,24 218:9,19 219:1,9,15,16,21 220:3 220:24 221:5,17,21 222:4 222:9,15 223:4,8,12,19 224:5,9,14,18,23 225:7 225:11,16,22 226:11,20 227:2,8,17 228:17,23 229:8,24 230:13,21,25 231:10,15,19 232:11,17 232:23 233:5,9 234:1,7 234:14,22 235:12,23 236:5,14,21 237:2 238:7 239:7,1,5,21 240:4,10 240:15,20 241:8,18 242:2 242:6,11 243:10,15 244:1 244:7,16,21 245:12,18 245:25 246:10,19,23 247:18,24 248:6,12,16 249:3,20,25 250:4,8,12 250:17 251:1,8,12,17,23 252:5,12,17 253:1,12,17 253:24 254:10 255:5,10 255:15,22 256:1,6,11 257:2,25 258:11,15,20 258:22 259:8,23 260:3,8 260:13,25 261:5,10,24</p>	<p>262:8,17,22 263:2,11,17 263:22 264:9,24 265:4 265:19,25 266:5,11,24 267:4,8,22 268:6,16,24 269:6,11 270:1,6,22 271:2,7,19 272:4,11 273:1,8,14,20 274:5,12 274:23 275:7,19 276:7 276:13,19,24 277:6,12 277:22 278:9,14,19,25 279:7,11,19 280:6,17,23 281:1,2,17,21 282:11,16 283:3,8,17,23 284:3,10 284:14 285:1,5,10,21 286:2,6,8,20,25 287:5 287:14,20,25 288:11,15 288:22,23 289:6,10,14 289:25 290:12,18 291:22 292:6,10,15,22 293:2,8 293:14,23 294:3,9,25 295:5,9,15,20,24 296:7 296:11 297:1,7,11,17,22 298:5,17 299:4,12,17,22 300:2,6,13,18,24 301:11 301:17,21 302:2,7,12,18 303:1,7,12,24 304:5,11 304:15,20 307:1,18 306:1 306:6,10,17,25 307:7,11 307:16,21 308:2,6,10,15 308:20,25 309:6,11,17 309:23 310:3,8,13 311:2 311:12,16,21 312:5,10 312:15,25 313:5,9,18 314:4,10,18 315:7,16,20 316:3,9,22 318:4,14 319:4,22 320:7,15,24 321:8,16,20 322:17,25 323:10,14,18,23 324:6 324:18 325:10,16 326:6 326:12,17,24 327:3,7,11 327:22 328:2,7,13,17 329:18 330:3,8,18,23 331:15,20 332:1 333:8 333:13,18 334:2,23 335:4 335:8,13,18,22 336:1,6 336:13,17,22 337:14,18 338:4,13 339:5,11,25 340:14,21 341:6,18 342:7 342:18 343:4,11,22 344:6 344:10 345:13,18,23 346:4,9,15,21,25 347:7 347:12,17,22 348:5,13 349:15,23 350:11,25 351:13,22 352:6,15,20 353:19 354:2,13 355:7 355:23 356:4,8,24 357:3 357:8,15,23 358:2,8 359:24 360:3,10,14,19 360:23 361:3,7 362:4,18 363:2 364:10,19 365:1,8 365:18 366:3,10,15,19 366:23 367:3,7,15,25 368:7,14 369:25 check [4] 107:4 271:14 273:7 321:7 checked [8] 256:22 259:20,24 287:11 318:1 318:1 320:21 321:4 checking [1] 270:21 Cheeseman [13] 30:24 31:12 32:10,12 100:6 222:18 224:10 232:3</p>	<p>265:7 333:20 344:12 345:10 346:6 chemo [1] 64:23 chose [1] 104:10 chosen [1] 62:25 Chris [6] 22:4 52:5 57:9 57:10 212:18 218:12 chronological [1] 247:13 chronology [4] 4:15 244:11 247:11 353:3 cited [1] 104:8 claim [3] 174:19 175:11 177:25 clarification [2] 226:3 256:24 clarifications [1] 227:12 clarify [5] 79:10,12 134:20 223:16 269:20 class [12] 1:13 4:19,22 4:24 5:5,9 52:8 57:5 61:4 124:22 209:13 357:20 classified [1] 81:8 classify [1] 101:3 clear [10] 69:15,18 73:2 76:7 143:6,12 215:5 241:24 270:15 323:15 clearly [5] 17:15 50:25 51:13 52:24 61:14 clinics [1] 233:12 clipping [2] 66:21 226:6 clippings [10] 30:7 48:7 53:13 60:17 110:25 111:11,25 170:8 232:7 326:21 close [5] 109:5 167:9 216:3 226:22 249:14 closed [5] 59:8,10 62:19 63:3 113:20 closely [3] 150:2 230:18 334:19 cloudy [1] 3:23 Co-counsel [2] 1:6,7 co-ordinate [1] 283:4 Coates [5] 325:18 328:21 329:6,17 341:23 Coffey [1] 1:6 com [1] 365:12 comfort [2] 290:8 343:1 comfortable [1] 259:22 coming [12] 14:14 17:13 95:13 114:21 135:13 145:21 154:1 167:5 186:17 246:2 256:14 319:7 comment [21] 15:11 28:25 41:21 51:24 65:13 98:11 111:2 115:23 150:24 184:2 233:20 236:25 237:21 267:12 293:15 338:18 340:8,12 340:18,23 363:9 commentary [3] 41:24 102:22 342:9</p>	<p>commenting [4] 150:18 182:21,22 340:13 comments [14] 37:25 38:7,16 39:20,22 48:13 48:19 51:24 152:23,24 153:11 269:14 334:3 338:16 Commerce [1] 361:24 Commission [13] 1:1,6 1:7 183:3 244:15 254:9 255:21 261:17 265:14 268:9 363:16 371:8,11 commissioner [159] 1:3 3:1,4,5,8,15,19 13:14 15:15,25 16:7,13,19 17:4 17:16,22 21:4,9 48:14 48:20 55:10,15,16,20 56:1 61:10 62:9,14 64:6 76:6,17,21,25 77:9,14 77:18,23 78:6,14,19 79:13,20,25 80:4,14 81:12,17,21 82:1,10,16 82:20 83:4,11,21 84:3,9 84:14,22 85:1,9,16 86:6 86:13,19 87:16 88:3,17 88:23 89:8 101:15,24 102:8,18 103:2,8,10 104:7,15,21,24 120:18 120:23 121:1,4 130:1,13 130:19,23 131:3,6,19 133:16,22 135:4,14,25 136:13,20 163:2,11 164:2 164:8,13 165:1,5 172:14 172:20 191:12,19 192:3 192:6,10,17 193:2 205:8 205:12,15,16,20 212:5 219:2,3,7,17 254:17,22 255:3 266:13,17 286:5 288:16,18,21,24 291:8 291:15 301:3,8 332:9,16 332:20 333:1,6 334:8 344:22 348:15 368:11,17 368:24 369:3,6,9,13,17 369:21 370:2,8 371:11 commitment [2] 26:11 187:21 commitments [1] 363:20 committed [2] 261:17 332:5 Committee [1] 296:15 communicate [7] 85:20 85:22 350:4,6 359:7 362:16 366:1 communicated [1] 143:4 communicating [1] 351:8 communication [10] 348:7 349:18 351:17 354:6 355:16 362:12 363:15 364:14,23 366:5 communications [83] 5:20 11:7 12:14 13:15 13:17,20 14:2 29:11 45:7 60:1 70:4 87:3,22,23 88:7 105:11 142:15 150:12 151:17,23 170:7 183:5 198:25 202:20 203:1 207:20 230:10</p>
--	--	---	--	--

<p>231:16 241:11 260:23 261:7 267:14 268:17,25 277:20 286:22 298:19,22 319:5 320:8 322:1 348:6 351:7 352:3,13,19 353:23 354:4,9,16,23,25 355:4 355:9,11,15,20 356:11 356:13,16,19 357:4,10 357:13 358:3,14,17,18 358:23 359:5,11,16,18 359:20 361:12,13,16 362:3,22 363:10,18 364:2 365:21</p> <p>company [1] 202:21 comparing [1] 22:16 comparison [1] 249:14 compile [2] 60:11,17 compiled [2] 326:3 344:25</p> <p>complaint [1] 12:18 complete [4] 93:16 196:16 342:20 343:14 completed [1] 121:17 complex [1] 340:3 component [3] 360:16 367:8,13 computers [1] 219:14 concentrated [2] 9:4,14 concern [29] 32:14,16 43:22 44:21,23 46:1 65:25 67:18 77:15 133:6 133:7,15 153:4 166:14 205:2 228:24 237:5,24 256:15 269:5 279:2 290:22 292:16 293:3,16 314:12 338:25 339:17 340:22</p> <p>concerned [10] 76:22 79:8 130:4 141:5 144:6 164:14 196:17 197:10,14 354:5</p> <p>concerns [16] 12:6,25 13:1 68:25 111:12 151:7 151:12 153:1 234:8 237:22 279:12,16 290:19 291:6 314:16 345:25</p> <p>concert [1] 363:17 concluded [2] 82:6 187:13 conclusion [1] 370:12 conducted [6] 18:12 19:11 58:2 64:17 367:14 368:3</p> <p>conference [17] 29:14 30:1 204:21 212:13 216:9 216:15,19 217:10,20 218:1,10 242:16 244:14 273:3 288:25 289:3 362:1</p> <p>conferences [2] 29:12 188:10 confidence [11] 52:18 65:20 68:2,5,18 111:13 144:14 202:23 237:18 259:18 363:21 confident [2] 209:18 215:14 confirm [3] 258:10</p>	<p>271:16 322:21 confirmed [3] 18:16 180:20 321:13 consider [2] 84:2 359:15 consideration [1] 236:6 considerations [3] 358:18 359:13,14 considered [1] 83:17 consistent [13] 20:6 39:20,25 132:24 195:15 205:3 222:13 240:23 241:6 273:2 291:13 292:19 315:2 consistently [1] 234:9 constantly [1] 234:9 constituency [1] 228:7 consult [1] 134:17 consultation [4] 79:23 88:8 119:24 134:14 consultations [1] 230:11 contact [26] 68:23 167:13 181:14,18 185:4,5,7 186:9,15 188:22 212:22 213:7 221:7 242:1 246:11 259:3 260:4 269:17 272:18 280:10 284:19 298:19 301:23 303:15 314:13 322:3 contacted [40] 21:16 54:5 146:5 181:17,20 202:8 220:22 257:13 269:22 270:9,13,17,17 272:19 273:24 274:18 279:21,25 299:8,9 301:10 301:23 314:23 315:9,10 315:11 317:15,23 318:7 318:13,16 319:8,11,20 320:4,11 322:4,11,24 323:6 contacting [5] 35:14 248:24 257:11 270:19 299:10 contain [3] 67:6 147:20 326:18 contained [8] 55:14 56:13 75:12 135:2 136:10 205:4 262:25 317:11 contains [1] 296:8 content [4] 164:15,18 200:1 222:5 contents [13] 2:1 73:5 73:14,16 80:18,19,23 81:1,8,10 83:18,20 84:12 context [9] 45:20 203:23 216:22 236:1 255:17 256:4 267:17 268:7 355:14 continue [2] 56:19 150:24 continued [2] 4:7 12:8 continues [1] 114:2 continuing [3] 168:16 290:2,4 contrary [4] 268:19 269:19 270:2 274:16 contrasting [1] 22:16</p>	<p>control [2] 215:14 324:20 convenient [2] 212:6 219:2 conversant [2] 126:21 130:16 conversation [17] 6:7 37:5 121:14 122:2 124:13 126:1,19,25 127:2 128:16 130:9,10 148:24 179:19 217:6 291:3 296:18 conversations [3] 62:6 242:7 313:17 conversion [25] 24:25 50:6,17,17 55:25 56:3,7 122:8 127:1,13,18 128:3 128:15,17,23 129:3,19 130:6,16,25 131:5,10,14 131:16 139:18 conversions [1] 25:9 converted [3] 24:21 58:20 61:6 convey [2] 331:22 332:3 conveyed [1] 360:25 cooperation [1] 118:4 copied [15] 48:6,9,12,17 118:5 208:17 212:20 222:19 226:1 248:19 276:20 281:25 294:12 324:10 329:8 copies [20] 53:5 105:20 105:21 106:14,18 107:7 108:6,16,19 109:2,4 112:10 138:2 142:10,11 157:4 203:12 303:2 306:12 329:12 copy [27] 26:4,16,17,18 68:14 106:24 125:16 140:7 141:16 160:19 192:4 203:24 206:23 207:21 210:5 251:4,9 294:16 295:19,21 296:21 299:3 302:21 314:20 328:22 334:13,25 copying [2] 232:15 331:2 corner [1] 63:25 corporation [1] 52:13 correct [28] 13:19 16:18 19:3 24:12 65:1,9 68:9 82:19 83:15 100:24 108:3 113:20 118:12,16 161:24 203:3 224:8 226:5,13,19 227:1,7,11 247:14 324:15 332:15 355:6 371:7 corrected [1] 225:18 correction [2] 225:5 247:17 correctly [8] 15:19 16:24 139:1 145:24 258:8 289:18 307:22 339:15 correspondence [1] 338:15 cost [1] 231:8 counsel [1] 370:11 couple [8] 19:18 52:4 125:25 173:13 181:23 245:13 269:14 363:6</p>	<p>course [11] 3:22 20:3 55:17 85:5 116:7 129:17 151:18 163:7 173:12 348:23 367:23 court [10] 56:13 124:21 132:5 140:6,15 144:9 147:18 152:10 249:11,15 courtesy [3] 231:6 232:21 233:3 coverage [29] 34:6 47:18 49:17,21 50:10 51:1 53:6 56:21 62:19 64:12 74:6 89:7,22,23 102:4 112:1 112:25 149:7 157:4 226:7 226:23 229:14 230:4,12 230:19 231:8 232:8,22 239:9 covered [5] 145:6 171:12 235:9 368:10,13 Crawley [4] 265:8 275:22 328:23 333:21 created [1] 363:12 credibility [1] 152:14 credit [2] 41:6,10 crept [1] 321:22 critical [1] 23:10 criticism [1] 363:11 Croix [4] 105:8,9 106:14 106:23 Crowley [1] 340:17 crunch [2] 198:18 200:23 Current [3] 34:9 288:6 353:10 cut [2] 157:2 284:21</p> <hr/> <p style="text-align: center;">-D-</p> <hr/> <p>daily [2] 105:24 111:1 damage [1] 324:20 Daniel [1] 1:10 data [17] 338:17,18,22 339:17,22 340:3,7,9,11 340:23 341:25 342:6,14 342:15 344:25 345:5 346:1 date [16] 33:19 62:25 63:1,18 119:10 188:23 203:6 206:21 221:10 222:20 247:5 277:25 278:4 296:2 310:9 321:3 dated [3] 132:2 294:22 371:16 dates [2] 63:16 146:1 dating [2] 56:23 297:13 Dawe [15] 38:24 39:1 40:9,17 41:7,10 42:8,13 47:23 48:2,10 57:17 63:17 337:12 338:2 Dawe's [7] 37:25 38:7 39:20,22 41:24 48:13,18 days [13] 49:15 54:17 74:6,8 102:19 129:18 146:12 147:23 173:13 175:15 334:12 344:24 368:9 dead [5] 159:1,5 165:10</p>	<p>165:19 168:3 deal [4] 76:8 345:8 346:11 348:8 dealing [10] 83:8 85:19 115:2,14 117:22 146:6 151:22 155:10 175:16 347:23 dealt [1] 65:8 Deana [1] 61:3 Deanne [1] 317:4 death [2] 38:18 42:19 Debbie [1] 227:21 deceased [9] 18:24 19:17 57:4 165:15,18,22 249:10 252:20,21 deceased's [2] 249:7 252:19 deceive [1] 24:5 December [61] 5:13 7:6 7:8,9,9 8:2,11 12:9 13:1 25:17 34:6 37:13,17 54:17 58:10 60:23 62:20 62:25 63:23 65:15,16 66:17,20 70:16 71:2 88:22,24 93:5 99:8 105:14 113:15,17 114:3 114:5,6 119:19 132:5 139:14 141:6 143:23,25 144:23 148:13 157:23,24 159:2 161:4,5 162:14 166:9 190:17 191:16 193:5 194:12 209:12 212:15 213:22 235:17,19 352:24 353:4 decided [3] 3:21 163:21 164:24 decision [10] 81:22 86:14 237:14 238:4,6 294:5 336:7,12,19 358:19 deemed [1] 120:10 defensiveness [4] 183:4 183:6 352:2,10 definition [1] 25:2 degree [1] 14:11 deliberate [2] 261:13,20 delighted [1] 3:20 demonstrates [1] 161:14 demonstrating [1] 162:22 Denic [1] 138:1 denied [1] 344:19 department [170] 4:24 8:15 14:5,8 26:3,9,13 29:11,21 30:10,20 40:17 41:5,25 43:8 53:24 54:19 58:24 60:1,16,18,23 61:20 62:24 68:22 75:20 76:9,18,22 77:15,20 78:10,23 80:21 85:18 89:16 94:9,11 95:5,24 96:24 97:12,19 98:2 102:12,13 105:12 106:6 114:4,11,12 116:3 117:3 118:6 123:25 124:10 125:20 128:19 133:8 135:11 137:9,19,20</p>
--	--	--	---	---

<p>138:12 140:18 142:9 143:5 147:19 148:6 152:17 155:1 157:14 160:17 161:16 162:10 164:1 166:14 167:20,23 170:1 172:4,5 173:14 175:15 176:18 177:17 181:7 184:25 189:4 190:7 190:11,15 191:6,16 193:6 194:11,15,19,23 197:11 203:10,24 204:6,19 220:6 220:21 221:23 234:6 235:14,18,24 236:8 240:24 241:7 246:11 251:3,4,15 252:13 254:16 255:2,7,11 259:21 260:9 263:14 266:7 267:1 276:20 277:4,7 279:2,13 282:6,8,10,15,17 283:1 288:3 307:15 309:13 310:18,22 313:12,14 318:21 325:15 328:9 329:5 334:13,19,24 335:14 336:2,19 340:18 343:9,14,18 346:22 349:2 349:10,13 352:18 355:17 355:21 364:16,22 365:6</p> <p>department's [6] 32:6 54:21 194:17,21 264:18 363:18</p> <p>departmental [5] 118:8 134:25 135:3 203:12 266:21</p> <p>departments [1] 78:9</p> <p>depend [1] 112:7</p> <p>Depending [1] 53:20</p> <p>deputy [51] 6:9,24 35:19 37:6,11 61:24,25 62:10 79:24 80:9,20 82:5 86:7 86:24 87:11 88:9,12 89:20 103:21 119:24 120:4 128:10 136:11,12 136:17 151:14 152:19 160:20 170:18 172:20,21 181:12,19 186:6 203:21 266:9,10 268:21 269:1 275:17,17 299:9,19 300:9 300:10,14,19,25 307:12 316:19 320:13</p> <p>derive [1] 182:14</p> <p>described [1] 77:1</p> <p>describing [1] 78:22</p> <p>description [1] 77:24</p> <p>desire [1] 255:19</p> <p>desired [2] 237:13 255:23</p> <p>desk [3] 106:17 223:25 224:2</p> <p>despite [1] 220:20</p> <p>destroy [1] 144:13</p> <p>detail [1] 123:16</p> <p>detailed [1] 178:7</p> <p>details [9] 55:4 94:25 121:20 125:12 180:20 232:6 249:8 291:2 359:9</p> <p>detecting [1] 227:3</p> <p>deteriorating [7] 184:23 189:10,12 190:24,25</p>	<p>256:13 259:17</p> <p>determine [11] 25:7 79:6 91:19 92:16 93:1 103:11 128:23 132:21 244:10 315:24 325:6</p> <p>determined [3] 78:10 79:4 172:15</p> <p>determines [2] 103:3,15</p> <p>determining [1] 278:4</p> <p>develop [2] 196:20 345:7</p> <p>developed [1] 358:14</p> <p>developing [2] 196:14 346:10</p> <p>died [1] 159:8</p> <p>difference [4] 115:4 234:5 235:11 249:21</p> <p>different [20] 49:18 76:2 86:22 87:7,8,20 111:3 115:8 162:1 164:9 235:9 249:16 330:12 358:9,10 361:8 363:6 365:13 366:2 367:10</p> <p>differently [2] 268:5 349:24</p> <p>differing [1] 47:1</p> <p>difficult [2] 69:7 365:24</p> <p>difficultly [1] 17:7</p> <p>direct [5] 6:25 42:17 115:13 201:22,25</p> <p>directed [2] 183:14 202:11</p> <p>direction [19] 32:21 33:1 33:6 86:6,11 172:19 203:16,19 204:3,24 206:14 209:1 254:15 255:1,1,12 268:14,22 269:10</p> <p>directions [1] 32:17</p> <p>directive [3] 182:8 183:19 187:2</p> <p>directly [10] 253:23 257:8 269:18,22 270:14 274:10,18 279:25 329:9 331:13</p> <p>director [9] 29:10 142:15 198:25 277:21 286:22 298:19,22 329:6 354:25</p> <p>directors [4] 87:23 88:8 289:5 291:18</p> <p>disclose [14] 11:24 16:23 23:9,13 32:19,22 51:16 58:17 75:16 150:8 163:22 164:25 165:14 220:13</p> <p>disclosed [33] 24:3 46:25 55:9,17,19,23 56:12 62:8 75:25 94:20 139:13 140:5 140:12 143:3,5,7 147:13 147:14,16 148:22 149:4 152:10 154:15 155:17 163:14 189:22 195:3,5,7 235:21 330:15,16 334:10</p> <p>disclosing [12] 11:16,18 17:3 23:12 33:2 52:21 76:2 140:13 144:8,11 149:2 193:17</p> <p>disclosure [12] 12:6</p>	<p>38:25 39:5 42:22 44:12 45:6,8,14,20 46:7 332:6 344:22</p> <p>discontinue [1] 229:16</p> <p>discovered [5] 220:17 220:20 250:22 251:21,22</p> <p>discovery [2] 250:24,25</p> <p>discrepancy [4] 38:13 220:18 230:20 251:22</p> <p>discuss [9] 6:18 80:9 142:25 155:25 211:21 223:13 242:19 244:2 245:1</p> <p>discussed [27] 5:6,23 94:24 108:7,10 109:8,10 109:13 110:11,17 111:15 138:12,16,17 140:1 156:2 177:24 180:5 243:5 289:16 290:13,17 293:7 364:15,22 365:3,6</p> <p>discussion [66] 4:23 6:3 27:3 28:12,15,18 54:18 63:10 68:11 89:25 110:3 111:8 123:11 125:1 129:6 129:18 131:10,18 134:6 137:8,10,20 140:23 141:19 142:24 144:21 165:17,20,24 166:14 168:8 171:14 173:14 175:14,18,23 177:16 178:8 179:15,21 191:6 205:7 216:18 217:14 226:7 236:12 239:15,18 243:11 253:3 260:23 261:4 267:23 289:19 291:4 302:14 309:24 310:17,21 313:11,13 314:11 322:12 323:25 328:8 338:2</p> <p>discussions [25] 7:8,12 49:5 114:16 121:24 124:18 125:3 126:6 138:18 145:12,16 150:10 184:7,16 188:18 242:8 258:16 274:19,21 275:8 309:12 337:2 345:3,20 346:5</p> <p>disease [1] 25:4</p> <p>dissatisfied [1] 6:14</p> <p>distinction [1] 235:14</p> <p>distinguish [2] 234:5 235:10</p> <p>distinguished [1] 235:5</p> <p>distinguishing [1] 235:25</p> <p>distribute [1] 217:16</p> <p>distributed [5] 60:18 216:25 217:9 247:4,12</p> <p>division [7] 1:15 60:1 81:2,4 83:15 105:12 170:7</p> <p>divisions [1] 135:10</p> <p>DM [1] 136:14</p> <p>doctor [2] 294:18 317:23</p> <p>doctors [5] 1:9 64:22,25 314:25 317:3</p> <p>document [50] 9:2 10:6</p>	<p>10:11,16,19 11:1,10 12:21,24 15:14,22 18:1 20:18 21:5 24:10 27:8 53:9,10 91:21,23 92:4 92:22 93:6,11 97:1 133:19 149:5,11 164:16 168:4 172:25 173:1 195:1 207:2,6 247:4 249:12 264:17 276:1,3 298:11 307:9 309:14,19,25 322:16 355:3 363:8 365:19 366:1</p> <p>documentation [12] 12:19 25:24 27:4 28:8 31:21 113:12 168:18 247:25 248:4 263:6,23 326:4</p> <p>documents [25] 8:4,10 8:18 16:15 22:13,17 24:10 28:3,19 163:6 164:9 166:4 170:16 249:14 252:6 264:25 296:8 311:7,8 312:16 313:13 332:12 339:24 343:6,6</p> <p>doesn't [20] 44:13 50:13 52:19 57:2 67:11 68:22 76:11 82:2,11 83:13 106:21 108:1 118:9 193:15 195:2,4 281:18 281:20 303:22 354:5</p> <p>domain [2] 140:15 264:4</p> <p>Don [1] 265:7</p> <p>Donahue [3] 308:9,11 308:12</p> <p>done [31] 33:5 47:10,12 47:19 71:16 79:23 80:12 83:18 109:3 149:18 187:22 188:6,10,12 204:14 223:20 233:6 247:8 248:7 258:12 266:25 291:14 292:21 294:15 302:20 317:10 331:16 354:15 355:10 358:23 363:17</p> <p>door [1] 228:22</p> <p>double [1] 318:1</p> <p>doubt [6] 258:25 259:6 315:22 318:10 321:21 322:22</p> <p>doubtful [1] 23:11</p> <p>Doug [1] 286:10</p> <p>down [26] 13:24 14:8,23 18:4 38:4,6 44:11 56:19 80:25 81:2 142:13 174:4 198:14,20 199:4 202:21 207:22 208:13 210:4,22 211:25 214:7 225:21 234:20 319:15 339:20</p> <p>Dr [16] 18:9 57:10 116:8 116:9 138:1 178:21 294:22 296:13,24 297:4 301:18 303:14,20 307:7 306:12 313:15</p> <p>draft [24] 132:25 254:3 262:18 265:10,12,20,24 269:23 273:16 275:23 282:2,4,12 284:16 313:21 313:22 336:25,25 337:4</p>	<p>337:7 338:8,15 340:15 344:4</p> <p>drafted [13] 71:1 254:7 261:25 262:3,6,20 265:16 282:15,17 310:21 314:7 314:14 337:9</p> <p>drafter [1] 93:16</p> <p>drafting [10] 90:7 94:1 117:10 118:23 132:9 163:5 263:3 270:7 313:23 313:25</p> <p>drafts [2] 22:11 75:22</p> <p>drawn [1] 235:14</p> <p>drug [1] 64:20</p> <p>due [11] 57:5,25 116:14 116:23,25 118:3 124:12 156:24 209:15 210:14 344:19</p> <p>duplicate [1] 283:15</p> <p>duplicating [1] 285:17</p> <p>during [11] 85:5 105:23 106:1 124:17 125:2 150:10 175:19,23 353:11 353:12,21</p> <p>duties [1] 347:9</p> <hr/> <p style="text-align: center;">-E-</p> <p>e [5] 106:18 157:18 245:8 281:22 296:3</p> <p>e-mail [114] 4:16 8:1 22:14 26:21 34:18 36:5 36:12 37:9 48:18 52:6 63:14 68:15 69:24 70:22 87:21 93:14 99:9,11 101:4,5 104:25 105:7,15 106:12,21,23 107:4 110:9 116:1 121:6 127:7 130:12 131:13 132:25 135:9 143:8,12 145:5 156:12 157:3,13,23 158:14 159:1 159:19 160:13 161:4 162:5 168:1 180:14 182:16 187:20 196:4,11 203:5 206:21 207:16 212:9,20 221:1 222:16 225:24 227:20,23 228:2 228:25 229:12 231:21,25 237:4,6,9 239:13,7,20 243:6,16,18,20,22,24 245:5,10 246:25 248:18 252:7 254:1 269:12,15 274:14 275:20 277:14 281:7 286:9,17 294:11 294:14 297:23 302:20 304:6 316:11 321:3 323:19,21 324:4 325:17 326:25 328:18 331:1 336:24 338:6 339:10 340:6 344:11</p> <p>e-mailed [3] 35:3 197:25 198:4</p> <p>e-mailing [2] 242:16 313:19</p> <p>e-mails [5] 158:15 167:4 198:4 233:16 260:15</p> <p>early [4] 92:9 121:17 175:15 196:10</p> <p>earshot [1] 177:17</p>
---	---	--	---	---

Inquiry on Hormone Receptor Testing

easier [1] 107:6	eleven [1] 84:21	265:14	55:19 56:5 121:20 136:14	false [6] 52:10,16,20 53:1 57:3 156:17
easily [1] 345:3	elicit [1] 354:10	et [1] 1:9	expecting [1] 341:7	familiar [2] 116:8 332:10
Eastern [94] 1:10 8:5 11:13 12:7 13:3,19 14:1 14:8 16:21 17:10 22:24 23:19 24:5 29:12 31:13 31:25 33:6,8,14 34:7 45:11,16 50:12,20 51:16 52:8,10,16,24 53:11 56:11,22 57:4,19,23 61:4 61:14 67:23 68:23 69:15 75:5,15,22 90:19 92:3 92:19 93:4 94:19 95:2 98:2 121:11,23 132:4,18 139:13 140:4,7 144:7 146:11 148:20,23 150:4 150:12 153:15,24 154:21 155:20 159:3 162:23 181:4,15 182:4,8 183:5 184:4,20 189:5,8 190:5 190:19 191:1 193:6 194:10,14 197:10 202:19 203:11,25 204:6,20 205:3 207:18 212:15 220:8 222:1 231:1,11 232:5,16 232:18 233:11,20 234:6 234:10 235:5 236:1,9 240:1 247:21 251:15 256:10,14,15 257:20 258:2,9,24,25 259:24 261:14 262:4,9,21 263:4 263:7 264:19,20 269:17 272:6,18 273:23,25 274:6 275:15 277:15,16 282:9 282:12,25 283:4 284:9 285:18 288:4,6 289:21 289:23 290:21 292:24 296:1 298:20 307:3 309:13 315:3,8,14 316:14 316:25 317:14 318:1,19 319:2,9,15,20,23 320:22 321:4 323:4 324:22 328:4 328:9 333:22,23 334:4 334:11 340:17 344:16,18 344:23,24 345:6 346:10 347:3 348:19 349:3,11 350:3,9 351:9 353:1,6,9 353:14 354:7	Elizabeth [9] 69:25 101:4 265:8 274:15 284:17,23 286:11 294:13 328:22	evaluate [2] 360:20 367:4	experience [2] 23:15 280:8	families [1] 159:14
Eastern's [3] 239:10 241:10,20	Elizabeth/Andrea [1] 70:18	evaluation [2] 360:16 367:13	experienced [1] 24:24	family [3] 272:20 273:4 317:16
educate [1] 354:24	embargo [1] 9:9	event [11] 31:18,23 33:11 33:25 47:11 58:23 74:19 144:10 154:15 207:3 332:24	expert [1] 151:17	far [1] 103:12
effect [3] 17:11 148:17 194:2	employment [1] 307:20	evening [16] 40:7 53:18 53:21 64:8,14 65:12 70:22 73:24 111:22 112:12 125:25 168:16 170:16 171:1 173:2 174:25	experts [1] 21:11	fashion [1] 213:3
effort [1] 97:11	empty [1] 83:19	events [2] 353:25 361:24	explained [3] 44:17 56:16 298:9	fast [1] 107:5
efforts [1] 227:11	end [7] 116:14,23 236:13 237:25 269:9 284:8 351:20	eventually [1] 280:19	explaining [1] 16:1	faulty [2] 4:20 324:21
eight [8] 64:20 84:17 105:20,21 106:4,14 108:15 109:4	ended [1] 271:23	everybody [5] 79:12 106:21 108:5 140:25 350:18	explanation [4] 15:18 319:1,10,12	fax [10] 252:7 296:1,2 307:2 306:22 311:5,7,25 333:20 345:16
either [17] 21:22 36:19 39:17 45:12 69:21 99:23 131:20 159:8 176:17 184:3 192:23 213:9 255:6 257:7,17 302:10 358:15	engaged [1] 112:16	evidence [6] 5:22 61:11 76:10 173:18 174:20 353:12	explanatory [4] 338:20 340:1 341:1 342:12	faxed [2] 296:25 298:16
Ejeckam [7] 294:18,22 296:24 297:4 303:20 313:15 325:4	Enjoy [1] 3:16	evolved [1] 119:1	express [6] 152:16 153:17,19 154:2 190:24 345:24	February [5] 64:18 114:6 247:5,6 344:19
Ejeckam's [3] 296:13 301:18 303:14	ensure [15] 130:15 204:18 214:3 230:11,19 256:24 261:18 271:14 276:17 285:13 290:8 322:11 323:5 349:3 362:24	evolves [1] 350:21	expressed [5] 33:14 41:5 218:7 293:3 315:23	feedback [6] 227:10,12 286:18 287:12 328:14 363:11
electronically [1] 30:8	ensuring [2] 190:7 222:2	exact [8] 14:15 17:19 119:10 122:2 277:19,24 278:4 283:21	expressing [1] 343:24	feeding [1] 224:1
elevated [1] 109:24	entail [1] 355:18	exactly [7] 233:23 281:8 281:8 292:9 293:19 339:3 360:22	extend [1] 228:15	feeling [4] 11:7 352:1,9 367:24
	enter [1] 65:6	Examination [2] 2:3 4:6	external [2] 173:15 202:20	fellow [1] 368:15
	entire [3] 10:16,19 313:6	example [14] 19:10 25:11 73:4 78:1 83:24 112:8 113:4 153:15 173:2 246:8 298:21 358:22 361:18 362:7	extremely [1] 97:24	felt [20] 6:24 13:8 23:7 38:20 72:7 86:9 109:21 148:2,7 152:12 173:6 183:4 201:18 213:22 215:13 216:11 259:22 282:19,20 339:21
	entitled [1] 343:16	examples [2] 25:11 359:10	eye [2] 216:3 226:22	few [7] 27:24 60:15 105:15 107:21 129:18 146:12 298:9
	envelopes [1] 370:10	except [2] 34:8 288:5	-F-	fiasco [1] 138:7
	environment [6] 356:12 356:13,18 358:25 367:19 367:21	exchange [17] 48:24 52:6 70:22 110:9 121:6 168:1 180:14 196:4 227:20 231:21 246:25 247:9 274:14 277:14 281:23 316:24 328:18	fact [90] 5:8 11:12,17 16:20 23:6,23 25:8 36:18 39:24 43:3 45:15 46:22 46:25 48:12 50:12 56:3 56:10 58:7,16 64:16 65:19 66:1 72:12 87:21 91:19 93:2 94:17,19,21 98:16 101:11 102:5 104:19 109:23 110:24 119:4 122:15 124:5 126:20 128:15 130:11 132:21 139:12 140:4 144:9 146:8,8,11 148:18 149:3 152:6 156:16 162:5 162:6,23 165:13 171:8 173:5 189:16 190:18,19 191:14 192:13,18 193:16 194:8,15 220:13,20 235:5 235:18 243:3 253:4 268:3 269:21 270:21 271:14 283:12 287:9 289:21 315:23 317:23,25 322:21 332:5 334:20 335:14 348:19 357:18,19	file [9] 151:22 155:10 170:6,6 231:4,11 235:17 256:20 334:20
	equally [2] 140:25 141:5	executive [2] 106:5 124:9	factor [1] 294:4	filed [5] 124:21 125:8 132:4,8 154:14
	equivalent [1] 70:7	exhibit [5] 24:8 56:20 157:10 180:19 281:3	factors [3] 25:5 132:16 340:4	files [5] 167:23 169:9,25 170:3,13
	ER [1] 280:3	exist [2] 44:13 96:23	facts [2] 163:15 282:24	final [7] 22:11 75:22,23 217:2 273:16,17 314:20
	ER/PR [56] 18:11 25:1 34:21 70:18 71:17 99:22 100:17 105:18 110:1 113:18 115:3 117:23 118:7 119:18 120:9 121:10,15,23 126:7 132:17 133:24 138:7,24 170:4 179:21 180:5 184:8 220:9 221:9 227:5 239:9 244:6 257:14 262:11 272:20 289:19 290:22 297:13 317:16 325:19 326:5 329:13 331:3 333:23 338:9 341:12 344:16 347:23 353:16 355:24 356:23 357:5 363:15 364:23,25 368:4	existed [2] 60:22 175:11	fair [3] 86:5 115:16,23	finalize [1] 282:3
	error [33] 21:20 24:20 25:8 38:14 39:8 43:2 56:14,16 90:21,23 91:11 91:19 92:14,20 93:2 94:23 95:14,20 98:7 127:17 132:21 139:16 160:5,8 161:22 163:18 164:23 193:15 195:20 209:11,15 210:14 233:15	existence [1] 125:2	fairly [5] 31:18,22 50:25 153:8 215:1	finalized [3] 186:2 199:11,16
	errors [1] 173:8	existing [2] 169:25 332:13	fairness [1] 353:9	finalizing [1] 94:11
	escaped [1] 61:13	exists [2] 96:10,12	fall [1] 241:3	finding [4] 3:25 147:12 147:15 183:6
	essentially [3] 106:1 190:2 350:6	expect [9] 19:3,6 69:11 163:7,10 171:10 232:24 365:12 368:23	fallout [1] 142:6	fine [1] 284:22
	estrogen [3] 58:1 61:7	expectation [3] 182:18 183:24 348:23		finish [2] 25:12 351:25
		expectations [1] 49:20		finished [1] 5:12
		expected [6] 21:5,8		first [32] 9:1 27:24 38:10 39:6 42:25 71:16 76:18 77:5 119:13 139:14,17 147:12,15 176:8 185:3,4 196:24 261:14 267:1 279:22 281:7 290:25 294:19 299:14 325:5 328:23 340:18 343:18 353:5 355:2 356:7,11

Inquiry on Hormone Receptor Testing

<p>80:10,17 83:14 84:6 85:10,22,24 87:24,25 98:17,24 99:4,5,19,22 99:25 100:13,18 101:5 102:6,10 103:20 104:1 104:20 120:7 142:13 166:3 167:9 369:8,12 fix [3] 42:23 68:7 111:14 fixation [4] 292:7,9,12 293:4 fixed [2] 39:2 45:22 flagged [2] 149:17 193:11 Fleet [1] 317:4 focus [3] 24:22 237:19 267:15 focused [4] 19:22 20:7 237:16 238:10 focusing [1] 20:9 follow [19] 23:3 47:6 53:25 54:8 67:23 82:3 116:18 127:6,9 130:14 131:17,21 141:25 265:12 269:9 300:14 333:2 338:3 361:11 follow-up [4] 188:18 216:14 345:6,16 followed [10] 47:5 49:16 117:8,10 123:19 128:10 143:8 300:11 322:10 323:4 following [28] 4:24 9:21 34:21 38:16 47:10 50:4 50:11 54:17 57:8,17 72:4 77:3 89:23 102:4 124:12 139:10 142:6 150:2 154:9 172:22 186:17 195:23 230:8 281:11 296:17 313:20 330:25 338:16 follows [1] 95:1 foregoing [1] 371:6 forever [1] 245:10 forgotten [1] 370:9 form [1] 338:24 format [6] 116:19 117:7 117:10,16,17 345:1 former [1] 286:22 forth [1] 312:12 forthcoming [4] 11:8 12:7 154:16 215:15 forward [20] 20:12 23:21 26:12 31:15,22 78:9 87:25 88:14 95:21 99:9 99:12 106:24 113:10 135:13 157:12 165:21 209:17 319:7 332:7 337:8 forwarded [25] 4:17 24:11 25:25 26:1 28:21 30:9 64:14 69:24 75:4 78:13 95:22 99:18 106:22 113:6 223:1 251:15 263:13 296:12 307:4,9 307:16 306:14 311:5 344:4,4 forwarding [13] 4:21 8:14 37:14 70:23 71:9 98:9 100:13 105:16</p>	<p>109:25 165:8 249:5 338:8 345:9 forwards [2] 8:4 93:15 found [5] 19:15 117:13 122:4 145:23 220:22 four [6] 34:17 73:17 83:14 98:18 99:10 142:13 frame [4] 169:10 173:6 173:10 250:22 Friday [6] 225:24 239:14 240:6 247:3,4 249:13 friend [1] 3:10 front [5] 22:15 53:9 153:25 154:6 366:1 frustrating [2] 196:23 348:18 frustration [1] 23:18 full [5] 8:24 193:17 237:15 238:9 317:1 fully [2] 189:7 348:24 Furlong [1] 70:8 future [2] 138:9 349:14 FYI [2] 121:10 286:14</p> <hr/> <p style="text-align: center;">-G-</p> <p>gain [1] 152:3 game [2] 25:10 193:23 gap [1] 355:25 gather [1] 169:22 gathering [1] 168:17 general [13] 5:8 87:14 88:6 179:19 354:22 358:7 358:11,14 359:25 360:2 361:4 366:4 367:19 generally [1] 365:11 George [6] 239:15 248:22 282:4 285:12 307:5 311:6 Gerry [1] 316:25 given [51] 10:11 11:6,12 12:13,17 16:20 18:23 19:14 23:15 24:19 57:1 71:14 82:22 87:7 89:4 94:3 97:22 103:25 110:24 122:3 124:19 148:17,18 149:1,8 152:6 169:4,10 187:2 218:22 235:16 236:7,7 254:15 256:12 268:14 271:20 275:10 280:12 295:13,19 299:3 311:13,17 312:18 313:1 315:22 318:11 320:5 332:21 334:18 giving [3] 46:19 87:4 319:6 glance [1] 8:25 Globe [7] 282:1,3,5,23 284:19 288:2 327:21 glue [1] 157:1 goal [1] 363:21 goes [8] 52:12 83:25 132:5 138:11 160:5 209:19 271:4 273:11 golf [1] 3:22</p>	<p>gone [12] 45:12,17 95:7 140:4 153:5 178:21 228:11 229:21 256:22 259:11 290:23 333:10 good [16] 3:4,6 4:9,11 116:11 151:18 212:24 219:17,20 243:22 288:16 361:14 362:10,16 363:23 364:6 government [51] 24:1 30:13 114:12 132:20 181:7 190:17 232:16 233:14 235:6,25 236:10 237:11 239:11 240:11 241:17,19,21 261:12,19 265:13 274:17 279:3,13 298:24 299:13 317:5 319:19,23 320:1,3 324:20 324:22 332:5,7 334:19 334:21 347:18 350:3,5 351:3 354:17 358:16,17 358:21,22 359:8 361:19 361:22 362:15,22 363:1 government's [5] 32:3 348:7 349:18,25 350:2 great [1] 173:7 greatly [1] 138:9 Griffiths [2] 71:2 93:17 group [5] 57:23 232:12 272:14 275:21 327:18 grudgingly [1] 41:15 guess [23] 15:5 40:11 41:19 65:10 73:1 100:2 123:23 124:3 138:19 160:1,2 162:5 233:24 246:20 248:18 322:15,20 332:10 393:12 345:16 357:18 358:9 360:24 gut [1] 103:13</p> <hr/> <p style="text-align: center;">-H-</p> <p>half [1] 3:13 hand-delivered [1] 26:24 handed [2] 21:9 217:2 handle [1] 190:6 handled [3] 268:4 335:9 349:24 hands [3] 115:14 247:21 350:5 happening [9] 12:13 64:8 196:19 198:16 216:4 243:7 303:25 356:15 363:24 Happy [2] 3:11 4:3 hard [2] 64:21 229:17 hate [3] 40:7,8 41:14 he'd [1] 308:21 head [1] 198:20 heading [3] 83:14 356:7 356:11 headings [1] 171:21 headlines [1] 113:3 heads [13] 87:4 143:15 146:3,8 148:17 149:2,8 162:10 242:18 243:1</p>	<p>303:18,23 335:7 health [213] 1:11,18 8:5 11:13 12:8 13:4,19 14:1 14:8 16:21 17:10 22:24 23:19 24:5 29:12 31:13 33:8,14 34:7 38:12 44:10 45:11,16 46:15 50:12,20 51:16 52:9,10,16,24 53:11 56:11,22 57:4,19 57:24 58:2 61:4,14 65:21 67:23 68:3,19,24 69:15 75:5,15,22 90:19 92:19 94:20 95:2 98:2 101:17 102:11,23 121:11,23 132:4,18 139:13 140:4,8 144:7 146:11 148:20,23 150:4 153:15,24 154:21 155:20 159:4 162:24 181:4,15 182:4,9 183:5 184:4,20 189:5,8 190:5 190:19 191:2 193:6 194:10,14 197:10 202:20 203:11,25 204:6,10,20 205:3 207:18 212:15 220:8 222:2 231:1,11 232:5,16 233:12,20 234:6 234:6,10 235:5 236:1,9 236:20 237:18 240:1 247:21 251:16 256:10,14 256:15 257:20 258:2,9 258:24 259:25 260:5 262:5,10,21 263:5,7 264:20,20 266:7 269:17 272:6,19 273:23 274:1,6 275:15 277:15,17 282:9 282:25 283:5 285:18 288:4,6 289:1,20,22,22 289:23 290:20,21 292:24 294:5 296:2 298:20 307:3 309:13 315:3,9,14 316:14 316:25 317:14 318:1,19 319:2,9,16,20,23 320:22 321:4 323:4 324:22 328:4 328:9 329:14 333:22,23 334:4,11 340:17 344:16 344:18,23,24 345:6 346:10 347:3 348:20 349:3,11,12 350:3,10 351:2,9 353:1,6,10,14 355:17 356:16,21 363:22 363:24 Health's [11] 31:25 33:6 92:3 93:4 150:12 232:19 259:1 261:14 282:13 284:9 354:7 hear [8] 16:23 48:25 64:21 114:3,7 176:8 218:7 271:9 heard [17] 15:19 36:1,10 41:4 56:15 63:11 139:15 253:10 254:18 270:12 297:3,8,12 364:15,22 365:2 371:9 heath [1] 64:24 held [5] 63:12 182:9 231:5 244:14 287:1 help [9] 158:25 165:9,11 168:2 197:17 209:5 323:21 339:21 349:13 helped [2] 64:23 209:4 helpful [6] 97:25 341:2</p>	<p>341:5,17,20 342:5 helping [1] 202:22 Hennebury [3] 1:9 368:25 369:1 Hennessey [56] 4:17 26:4 28:19 37:11 48:25 62:13 63:22 66:21,25 67:17,22 68:12 69:2 71:2 93:15 116:9 121:8 127:7 127:22 130:15 131:21 134:14,16 140:22 155:11 167:22 168:25 169:4,9 173:22 176:12 177:4 178:20 206:24 208:18 209:8 213:19 226:2 232:3 237:7,9 238:8 248:20 254:2 256:22 257:4 258:1 258:7,8 264:7 276:21 313:14 318:22 324:10 325:18 327:16 Hennessey's [2] 170:6 170:13 hereby [1] 371:6 hesitancy [2] 227:14,16 Hi [1] 278:2 high [11] 20:25 115:9 120:14 206:25 262:11 324:12,12 331:4 356:20 359:3 363:12 highlight [2] 359:3,14 highlighted [4] 133:14 194:14 195:16 366:8 highlighting [2] 257:12 363:23 himself [3] 27:13 242:1 302:11 hindsight [7] 50:2,15 58:18 76:1 97:21 149:20 149:23 hints [1] 161:13 hired [1] 202:20 hold [9] 32:22 181:24,25 182:4,5,18,18 183:12 184:4 holding [3] 46:18 133:11 294:21 Honourable [2] 1:3 371:10 hope [1] 3:13 hoped [1] 202:13 horizon [1] 362:12 hormone [3] 1:2 37:16 371:8 hospital [2] 56:24 65:7 hospitals [1] 233:12 host [2] 223:24 324:19 hot [1] 73:20 hour [6] 65:11 105:24 107:1 112:13 180:3 368:23 hours [1] 36:2 house [90] 8:23 16:10 30:5 34:22,24 35:1 36:3 36:7 59:4,6,8,13 62:19 63:3 65:16,23 66:8 71:4 71:5,14,24 72:1,2 73:2</p>
--	--	---	---	---

Inquiry on Hormone Receptor Testing

<p>73:22,25 74:7,23 78:6 79:17 81:15,23 82:4,24 83:1 85:6,13 86:1 87:19 88:16 89:5 91:10 94:3 99:6,20 101:12 102:4 105:17,23,25 107:2,3 108:11 109:5 111:8 113:16,20 116:10,12,17 118:8,18 119:7,13,20 135:20 180:20 184:3 185:8 294:19,23 295:2 296:18 297:25 298:11,21 299:7 302:15 303:17,21 304:1,8,12,16 305:1 311:24 312:6,17 318:5 321:2</p> <p>Howell [3] 18:10 57:10 178:21</p> <p>human [5] 38:14 39:7 43:2 209:15 210:14</p> <p>hundred [6] 264:10,12 264:14,15 275:1,5</p> <p>Hunt [1] 116:9</p> <p>Hynes [10] 4:18 37:12 40:6,8,12,16 41:19 48:24 63:22 140:20</p> <p>hypothetical [1] 201:24</p>	<p>inaccuracies [1] 58:1</p> <p>inaccurate [4] 223:18 224:4 282:24 353:1</p> <p>inappropriate [1] 57:1</p> <p>Inaudible [1] 206:18</p> <p>include [11] 57:2 94:12 122:5 135:15 231:1 261:7 262:13 268:3,15 326:25 359:21</p> <p>included [30] 53:14 95:6 96:2,18 157:4,22 174:3 174:7 207:2 208:1 209:10 237:8 256:8 261:11 262:14 268:11 271:17 287:12 313:6 318:2 327:6 328:4,24 330:4 340:2 356:1 357:5 367:12,16 367:18</p> <p>includes [5] 116:7 163:5 296:13 311:7 325:20</p> <p>including [12] 23:16 26:3 50:10 190:16 229:14 232:1,18,22 237:8 262:7 357:16,16</p> <p>inclusion [1] 254:7</p> <p>inconsistency [3] 250:25 291:4,9</p> <p>incorrect [1] 133:24</p> <p>incorrectly [2] 64:17 65:5</p> <p>indeed [5] 40:14 41:2 82:24 85:18 269:17</p> <p>independent [2] 323:24 352:25</p> <p>indicate [9] 26:15 117:7 123:15 124:17 171:10 176:17 240:5 308:21 334:3</p> <p>indicated [21] 5:22 22:5 22:20 44:3 59:24 90:18 101:11 117:2 119:23 136:1 146:4 173:20 218:17 233:14 268:2 296:22 299:2 317:7 320:21 337:4 345:4</p> <p>indicates [7] 18:10 168:2 192:23 197:16 237:10 270:2 286:12</p> <p>indicating [3] 20:10 21:17 284:17</p> <p>indication [3] 18:21,24 18:25</p> <p>individual [10] 14:7 25:9 65:20 68:2 315:1,12 317:3 318:12 322:10 323:5</p> <p>individuals [11] 21:10 24:23 116:2,3 159:3,8 159:10,12 266:2,22 318:24</p> <p>inevitably [1] 140:14</p> <p>inform [4] 99:3,4 193:6 358:16</p> <p>informally [1] 5:24</p> <p>information [234] 11:8 11:16,18 12:7,20 13:16 14:6 16:22 20:11 23:9</p>	<p>23:12,19,20 26:2,8 35:18 37:4 45:12,17 46:4,8,17 46:19,24 47:1,2 51:17 54:6 55:8,11,14 56:12 57:12 60:12 62:7 67:24 68:24 69:12 70:19 71:11 71:14 72:14 74:9 75:4 75:11,16,25 79:2 90:8 94:20 95:21 96:2,10,12 97:16,17,18 106:7 115:11 121:13,19 122:11,16,16 122:18,21 123:20 124:4 124:5,6,15,19 125:16 126:13 127:12 129:1 134:10,16,23 135:1 136:9 139:14 140:5,8,12,13 141:5 143:3,11,22 144:8 144:12,22 147:13,16,17 147:18,21 148:22 149:3 150:8 152:5,7,9 153:14 154:1,3,10,14,17 155:17 163:14 165:14,21 167:14 167:19,20 168:11 169:22 177:5 181:1 183:25 189:16,21,23 191:24 193:8,8,13 194:12 204:19 209:12 215:16 218:1 220:7,10,12,14 224:1,4 225:6 235:20 240:1 246:7 251:22 256:5,7,10,13,16 256:19,24 257:15 258:1 258:4,24 259:1,7,15,20 261:13,21 262:4,21 264:3 264:4 272:2,22 274:9,25 275:5,9,11,14,16 317:17 320:21 329:4,8 330:15 330:16 333:10 334:7,10 334:12,14,18,22,25 335:3 335:12,15 336:8 337:6 338:21,23 339:1,4,20,23 340:1 341:1,3,14,24 342:3,4,13,20,21 343:1 343:3,5,5,9,15,16,17 344:1,15,20,21,24 345:2 345:12 349:5,7,12 350:8 350:9,12,14 352:11 365:23</p> <p>informed [8] 121:16 181:10 191:21 314:25 315:11 317:2 352:18 353:23</p> <p>informing [3] 85:3 98:24 124:1</p> <p>initial [3] 27:7 52:16 270:12</p> <p>initiated [5] 25:6 91:18 92:25 132:19 354:1</p> <p>initiation [1] 33:6</p> <p>initiative [2] 358:21 359:7</p> <p>initiatives [5] 361:18 362:25 363:19 365:24 366:2</p> <p>input [15] 7:15,21 62:24 171:3 199:25 222:6 248:1 248:8 260:15 266:2,6 313:22,25 336:2,19</p> <p>inquire [1] 319:2</p> <p>inquired [1] 33:19</p> <p>inquiries [7] 53:25 69:7</p>	<p>113:23 146:12 273:25 274:4 299:13</p> <p>inquiring [2] 128:3 280:13</p> <p>inquiry [25] 1:1 237:16 238:10 244:15 254:9 255:21 260:18 261:7,18 265:14 267:15 268:9 271:4 278:16,22 317:14 325:11,14 332:6,25 357:18 363:13,16 371:8 371:11</p> <p>insert [1] 93:8</p> <p>inserted [4] 77:25 85:4 93:12 94:5</p> <p>instance [7] 104:3 217:18 329:11 358:7,10 365:14,15</p> <p>instances [1] 135:12</p> <p>instead [5] 88:1 245:8 270:14 306:7 338:23</p> <p>instructed [4] 208:22 230:22 347:4,14</p> <p>instructing [1] 343:25</p> <p>Integrated [2] 1:10,18</p> <p>intention [2] 226:18 262:7</p> <p>intentional [1] 153:14</p> <p>intentionally [2] 97:12 152:7</p> <p>interested [2] 5:19 22:6</p> <p>interests [1] 21:18</p> <p>interim [2] 114:17 334:5</p> <p>interpret [3] 47:16 339:22 345:25</p> <p>interpretation [4] 138:8 338:22 340:2 345:5</p> <p>interpreted [4] 338:19 339:19 340:9 345:3</p> <p>interpreting [3] 38:15 39:8 45:1</p> <p>interrupted [1] 89:9</p> <p>interview [2] 57:10 317:6</p> <p>interviews [3] 212:15 216:14 233:19</p> <p>investments [1] 363:20</p> <p>invitation [2] 197:22,24</p> <p>invited [2] 228:19 246:6</p> <p>involved [27] 25:5 90:6 90:13 95:10 132:9,17 135:5,10,21 136:3,5 138:18 168:17 170:21 222:2 289:2 312:22 329:9 329:15,19,23 334:20 335:11 346:17 347:18,24 364:12</p> <p>involvement [5] 115:5 221:14 282:18 347:2,24</p> <p>involving [2] 113:13 289:1</p> <p>irrelevant [1] 182:17</p> <p>issue [167] 5:5 11:22 13:4 13:13 14:2 28:13 31:13 34:8 38:18 40:16 41:23</p>	<p>41:24 42:19 47:11 53:14 58:23 69:9,16 70:19 71:17 72:24 73:7,20,23 74:2,7 77:5 78:3 81:1,6 82:7,7 83:17 86:3,9,12 86:25 88:11 89:3,7 91:12 98:21 101:13,16,24 102:23 103:25 104:6 108:7,14,17 109:9,19,23 110:1 111:9,23 112:3 114:2,4,7,17 115:3,14 118:10,18 119:18 120:10 121:24,25 122:4,10 123:11,25 124:18 126:7 126:13,16,22 129:7,19 133:3,11 136:8 137:9 138:13,17,20,24 142:14 145:13 149:8 150:2 152:2 152:6 153:2 156:25 169:11 175:16 177:10 179:22 180:5 181:1 184:8 184:25 185:5 216:4 220:9 220:12 226:4,24 227:22 228:14 237:6 241:1 242:8 242:19 244:2,6,8 252:20 256:5,19 267:14,17 268:5 268:25 280:19 286:13 288:4 290:23 292:11,24 293:5 297:4,12 303:14 312:23 316:5 319:7 321:5 323:25 325:12 331:25 347:23 348:9 349:19,22 350:5,21 353:15,16,21 354:7,18 355:10,11,19 357:10,13,16 359:10,18 362:1 364:15 367:21,24</p> <p>issued [2] 317:12 337:21</p> <p>issues [87] 5:20,24 11:6 21:22 59:21 76:8,13 77:19 78:10,11,12,24 79:3,5,18 80:11,17,21 80:24 81:3,7,9 83:24 84:1,2,6,7,18,19 85:4,11 87:2,14,24,25 88:6 89:1 92:20 99:4,5,19 100:13 101:22 102:6,14 103:16 103:17,20,23 104:20 106:4 109:16,17,17 111:3 115:11 116:14 118:3 119:20,23 120:6,7,15 137:19,19 138:18 171:11 171:18,21 202:6 218:7 267:11,15 297:4 348:24 351:6,25 352:3,13 353:23 354:4,9 355:21 356:1,21 362:23 365:3</p> <p>item [4] 3:9 4:19,22 85:17</p> <p>items [3] 80:3,8,9</p> <p>itself [1] 241:21</p>
-I-				
<p>idea [15] 122:10 151:5 153:13 162:11 228:3 234:23 243:23 244:25 282:19 321:23 343:24 346:10,12 362:9 364:20</p> <p>identification [1] 122:21</p> <p>identified [4] 18:18 73:7 91:12 209:4</p> <p>identify [5] 87:1,24 123:5 366:11,16</p> <p>identifying [1] 334:10</p> <p>IHC [2] 291:25 297:13</p> <p>imbedded [1] 193:9</p> <p>immediately [1] 262:9</p> <p>immunohistochemistry [2] 307:6 353:8</p> <p>impacts [1] 237:12</p> <p>implementation [1] 363:19</p> <p>implemented [6] 262:10 263:8 310:14,16,17,20</p> <p>importance [8] 87:8 103:4,17 195:24 261:16 324:12 331:4 349:7</p> <p>important [20] 59:12 87:1 91:8,12 96:10 101:23 160:12 230:14 235:13,21 259:2 267:25 268:10 280:7 340:4 343:13 349:6 362:21,24 364:2</p> <p>importantly [1] 61:10</p> <p>impression [8] 17:1,5 17:13,20 20:14,15 33:23 34:2</p> <p>improved [1] 351:19</p>	<p>incorrectly [2] 64:17 65:5</p> <p>indeed [5] 40:14 41:2 82:24 85:18 269:17</p> <p>independent [2] 323:24 352:25</p> <p>indicate [9] 26:15 117:7 123:15 124:17 171:10 176:17 240:5 308:21 334:3</p> <p>indicated [21] 5:22 22:5 22:20 44:3 59:24 90:18 101:11 117:2 119:23 136:1 146:4 173:20 218:17 233:14 268:2 296:22 299:2 317:7 320:21 337:4 345:4</p> <p>indicates [7] 18:10 168:2 192:23 197:16 237:10 270:2 286:12</p> <p>indicating [3] 20:10 21:17 284:17</p> <p>indication [3] 18:21,24 18:25</p> <p>individual [10] 14:7 25:9 65:20 68:2 315:1,12 317:3 318:12 322:10 323:5</p> <p>individuals [11] 21:10 24:23 116:2,3 159:3,8 159:10,12 266:2,22 318:24</p> <p>inevitably [1] 140:14</p> <p>inform [4] 99:3,4 193:6 358:16</p> <p>informally [1] 5:24</p> <p>information [234] 11:8 11:16,18 12:7,20 13:16 14:6 16:22 20:11 23:9</p>	<p>informed [8] 121:16 181:10 191:21 314:25 315:11 317:2 352:18 353:23</p> <p>informing [3] 85:3 98:24 124:1</p> <p>initial [3] 27:7 52:16 270:12</p> <p>initiated [5] 25:6 91:18 92:25 132:19 354:1</p> <p>initiation [1] 33:6</p> <p>initiative [2] 358:21 359:7</p> <p>initiatives [5] 361:18 362:25 363:19 365:24 366:2</p> <p>input [15] 7:15,21 62:24 171:3 199:25 222:6 248:1 248:8 260:15 266:2,6 313:22,25 336:2,19</p> <p>inquire [1] 319:2</p> <p>inquired [1] 33:19</p> <p>inquiries [7] 53:25 69:7</p>	<p>intentional [1] 153:14</p> <p>intentionally [2] 97:12 152:7</p> <p>interested [2] 5:19 22:6</p> <p>interests [1] 21:18</p> <p>interim [2] 114:17 334:5</p> <p>interpret [3] 47:16 339:22 345:25</p> <p>interpretation [4] 138:8 338:22 340:2 345:5</p> <p>interpreted [4] 338:19 339:19 340:9 345:3</p> <p>interpreting [3] 38:15 39:8 45:1</p> <p>interrupted [1] 89:9</p> <p>interview [2] 57:10 317:6</p> <p>interviews [3] 212:15 216:14 233:19</p> <p>investments [1] 363:20</p> <p>invitation [2] 197:22,24</p> <p>invited [2] 228:19 246:6</p> <p>involved [27] 25:5 90:6 90:13 95:10 132:9,17 135:5,10,21 136:3,5 138:18 168:17 170:21 222:2 289:2 312:22 329:9 329:15,19,23 334:20 335:11 346:17 347:18,24 364:12</p> <p>involvement [5] 115:5 221:14 282:18 347:2,24</p> <p>involving [2] 113:13 289:1</p> <p>irrelevant [1] 182:17</p> <p>issue [167] 5:5 11:22 13:4 13:13 14:2 28:13 31:13 34:8 38:18 40:16 41:23</p>	<p>issued [2] 317:12 337:21</p> <p>issues [87] 5:20,24 11:6 21:22 59:21 76:8,13 77:19 78:10,11,12,24 79:3,5,18 80:11,17,21 80:24 81:3,7,9 83:24 84:1,2,6,7,18,19 85:4,11 87:2,14,24,25 88:6 89:1 92:20 99:4,5,19 100:13 101:22 102:6,14 103:16 103:17,20,23 104:20 106:4 109:16,17,17 111:3 115:11 116:14 118:3 119:20,23 120:6,7,15 137:19,19 138:18 171:11 171:18,21 202:6 218:7 267:11,15 297:4 348:24 351:6,25 352:3,13 353:23 354:4,9 355:21 356:1,21 362:23 365:3</p> <p>item [4] 3:9 4:19,22 85:17</p> <p>items [3] 80:3,8,9</p> <p>itself [1] 241:21</p>
-J-				
<p>Jane [2] 1:9 159:4</p> <p>January [2] 114:3,6</p> <p>Jeanette [1] 277:14</p> <p>Jennifer [1] 1:15</p> <p>jeopardize [1] 138:9</p> <p>Joan [2] 337:3,9</p> <p>job [8] 47:5 58:22 61:12</p>				

<p>67:16 192:19 229:17 347:9 362:24 jog [2] 281:18 339:12 John [2] 239:13 267:16 John's [9] 248:23 249:4 290:5,7 291:24 292:1 294:6 371:12,16 joined [1] 4:19 joining [1] 209:13 Jones [1] 334:5 Josephine [2] 30:24 265:7 judge [1] 369:22 judgment [6] 102:9 103:9,21 104:4,17 144:18 judicial [2] 237:15 238:9 Judy [2] 371:6,21 July [11] 240:24 328:19 328:19 330:25 331:8 333:21 338:7 355:8 356:25 357:5,9 June [16] 1:4 307:8 310:10 312:12 313:20 316:5 321:1 322:12 323:11 324:9 325:22 327:13 334:8 344:21 371:9,17 jurisdictions [1] 290:11 Justice [2] 1:3 371:10</p>	<p>350:24 knows [4] 82:21 83:5,6 350:18</p> <hr/> <p style="text-align: center;">-L-</p> <hr/> <p>lab [7] 57:20 58:2 291:4 291:20,25,25 353:9 laboratory [2] 18:12 133:23 Labrador [4] 37:15 233:14 371:12,16 Labrador-Grenfell [1] 1:17 lack [14] 12:6,7 38:25 42:22 44:11 45:6,8,14 45:20 46:7 160:4 164:23 190:25 293:21 Laing [1] 1:9 language [1] 94:4 larger [8] 228:16 229:7 296:23 298:14,15 300:5 300:7,20 last [15] 37:16 48:15 64:18 130:2 132:3,15 133:21 206:6 247:5 310:10 316:4 324:22 347:13 351:15 368:2 late [3] 53:20 167:5 368:18 latest [6] 61:6 70:24 113:3 272:15 282:2 284:16 launched [1] 57:6 lawsuit [9] 38:12 44:9 44:15 46:15 52:8,25 57:6 61:4 357:20 lawyer [2] 144:25 159:4 lawyers [1] 368:15 lead [3] 191:20 222:21 223:17 leader [1] 316:13 leading [4] 7:5,7 356:22 358:22 leads [1] 35:20 learn [1] 174:17 learned [7] 3:10 139:11 166:24 299:23 348:8,12 348:25 least [11] 16:2,15 22:2 33:15,23 64:12 109:24 161:21 214:12 251:3 261:6 leave [7] 44:5 259:4 348:1,2 349:17 351:21 368:2 leaving [4] 17:2,15,21 20:15 led [2] 49:24 128:16 left [11] 24:1 83:19 148:21 194:18 247:20 294:12 307:15,19 312:1 312:3 349:16 legal [10] 25:5,7 46:18 91:17,18 92:15,24 93:1 132:19,20</p>	<p>legislation [1] 330:17 length [10] 233:13,17,21 234:10 235:6 236:9 237:1 284:20 348:20 351:4 lengthy [2] 10:11 370:5 lens [5] 11:23 23:10 46:4 47:3 75:24 Leona [1] 34:18 less [1] 126:21 lesson [1] 348:25 lessons [2] 348:8,11 letter [38] 137:25 138:1 138:15 282:1,2,5,19,20 283:13,13,21,22,24 284:7 284:8,9,11,16,20 285:2 285:6,13,23 288:1,3,9 303:21 322:8 323:3 324:11,24 325:2,4,6 327:24 334:13 339:7 340:2 letters [3] 282:9 283:15 283:16 letting [1] 171:6 Letto [1] 286:10 level [18] 21:1 23:25 24:4 32:14,16 115:4,10 149:24 184:23 190:4,25 197:7 256:13 266:21 290:8 343:1 356:20 359:3 levels [1] 87:8 liability [1] 46:19 life [4] 3:13 38:17 42:19 82:2 light [2] 88:25 328:3 likelihood [1] 120:13 likely [27] 8:23 11:9 12:15,20 36:9,18,23 39:4 79:5 110:10,17,22,24 120:12 135:24 137:21 202:8 207:1 213:2 245:7 251:11 253:8,13,16 255:14 275:13 303:22 limited [6] 121:19 122:11 122:17,20,25 126:20 Linda [1] 324:24 line [9] 64:2 87:4 112:22 112:24 113:2 200:19 236:18 324:14 354:14 lines [2] 171:25 244:11 list [15] 60:17 78:15,18 78:24 79:18,23,24 80:3 80:8 116:16 118:8 119:20 207:5 262:13 275:24 listed [4] 73:12,13 80:22 80:24 literally [1] 106:17 litigation [4] 144:5 154:9 154:12 156:24 live [1] 222:22 lives [1] 327:14 local [1] 102:21 logical [1] 68:21 longer [4] 116:16 118:7 190:4 296:23 look [47] 7:25 9:9 15:13</p>	<p>22:12 24:7 25:21 26:1 31:20 34:17 38:4 50:15 69:23 70:24 100:4 116:1 119:11 129:24 136:15 137:7 142:17 156:11 158:12 180:13 191:11 198:23 202:16 212:4 227:9 239:14 265:5 267:9 272:5 273:9 275:20 277:13 285:11 287:16 295:25 303:13 311:3 313:10 314:19 316:10 339:13,20 352:21 362:8 looked [11] 10:7 11:20 63:14 111:12 126:5 163:16 193:20 234:20 239:12 273:17 342:1 looking [34] 11:22 13:14 20:5 22:5 23:10 46:3 47:3 50:7 54:6 58:17 60:11 66:16 68:1 74:5 75:21,23 81:5 90:4 122:7 122:15 149:16 153:23 165:11 177:17 197:11 198:20 199:2 239:25 245:4 253:5 284:7 293:24 332:7 352:8 looks [4] 64:1 281:3 324:13 370:4 loop [2] 14:4 184:21 losing [4] 65:20 68:2,5 68:18 loss [4] 138:4,8 155:1 189:3 lost [3] 189:4,7 254:19 lots [1] 166:4 Louise [1] 334:5 low [1] 233:15 lunch [3] 201:9 212:7 219:6</p>	<p>114:21 116:9,23 118:14 119:21 121:9 126:2,4 138:2 Margaret [1] 371:10 margin [2] 98:6 195:20 Marian [1] 340:17 Mark [9] 1:14 3:10,11 156:20 334:5 338:9,10 340:16 345:4 Mary [3] 105:8,9,19 master [1] 79:18 material [27] 30:12,14 143:17 158:6 160:4 161:15,17 162:7,9,13 164:20 185:25 186:5 199:10,15 200:1 201:14 202:3 214:6,17 215:9 222:13 263:4 275:15 310:24 321:24 330:13 materials [50] 10:22 11:20 22:9 26:12 27:10 28:22 31:16 75:21,23 78:8 93:16 94:12,16 141:11 149:1 157:24 158:4,9 160:7 163:17,23 164:3 190:17 191:15 192:5 193:10,14,16 194:9 196:6,12,18,25 197:8 198:17,19,22 199:5 217:2 257:10 258:5 260:24 263:1 264:20 273:7 274:10 296:24 326:15,22 332:21 maternity [4] 44:4 347:25 349:17 351:20 matter [13] 65:9 76:11 83:13 92:14 97:14 98:23 102:22 143:6 166:3 173:25 350:13,16 371:7 Matthews [43] 5:24 6:17 69:25,25 70:12 71:13 72:14 75:2 98:10 105:16 184:14,17 185:4,24 186:9 222:19 232:2 255:6 265:8 269:13,20 274:15,19,24 275:22 284:23 286:12 287:10,13,15 298:22,24 299:1,18 301:9 302:10 302:10,13 333:20 334:15 344:12 345:10 346:6</p>
<hr/> <p style="text-align: center;">-K-</p> <hr/> <p>Kara [1] 1:9 keep [2] 14:3 340:5 keeping [4] 184:21 226:22 352:18 353:22 kept [2] 78:23 216:3 key [55] 9:2,5,14 10:2 16:4 21:1,3,17,21 22:2 27:8 90:5,14,22 91:4,21 91:23 92:3,8 93:8,13,20 93:24 94:11 95:15 118:24 119:2 132:10,15 133:4 133:11 134:21,22 136:2 136:5 254:3,4 255:16 256:8,16 261:11,25 294:14 302:20,21,24 303:3 331:3,5,7,9,22 359:2,21 366:20 kind [5] 103:18 178:23 341:4,7 368:2 kinds [2] 163:6 172:9 knew [14] 92:19 125:12 127:1 163:13 172:4,5 237:16,25 238:10 239:11 240:11 241:17,22,22 knowing [7] 11:21 22:6 22:24 144:9 163:12 173:8 303:20 knowledge [17] 40:15 41:23 62:2,5 63:11 126:21 147:22 191:23 285:7 286:18 290:23 295:10 299:11 303:6 306:23 307:2 335:17 known [6] 55:9 76:1 130:10 158:20 241:7</p>	<hr/> <p style="text-align: center;">-L-</p> <hr/> <p>lab [7] 57:20 58:2 291:4 291:20,25,25 353:9 laboratory [2] 18:12 133:23 Labrador [4] 37:15 233:14 371:12,16 Labrador-Grenfell [1] 1:17 lack [14] 12:6,7 38:25 42:22 44:11 45:6,8,14 45:20 46:7 160:4 164:23 190:25 293:21 Laing [1] 1:9 language [1] 94:4 larger [8] 228:16 229:7 296:23 298:14,15 300:5 300:7,20 last [15] 37:16 48:15 64:18 130:2 132:3,15 133:21 206:6 247:5 310:10 316:4 324:22 347:13 351:15 368:2 late [3] 53:20 167:5 368:18 latest [6] 61:6 70:24 113:3 272:15 282:2 284:16 launched [1] 57:6 lawsuit [9] 38:12 44:9 44:15 46:15 52:8,25 57:6 61:4 357:20 lawyer [2] 144:25 159:4 lawyers [1] 368:15 lead [3] 191:20 222:21 223:17 leader [1] 316:13 leading [4] 7:5,7 356:22 358:22 leads [1] 35:20 learn [1] 174:17 learned [7] 3:10 139:11 166:24 299:23 348:8,12 348:25 least [11] 16:2,15 22:2 33:15,23 64:12 109:24 161:21 214:12 251:3 261:6 leave [7] 44:5 259:4 348:1,2 349:17 351:21 368:2 leaving [4] 17:2,15,21 20:15 led [2] 49:24 128:16 left [11] 24:1 83:19 148:21 194:18 247:20 294:12 307:15,19 312:1 312:3 349:16 legal [10] 25:5,7 46:18 91:17,18 92:15,24 93:1 132:19,20</p>	<p>legislation [1] 330:17 length [10] 233:13,17,21 234:10 235:6 236:9 237:1 284:20 348:20 351:4 lengthy [2] 10:11 370:5 lens [5] 11:23 23:10 46:4 47:3 75:24 Leona [1] 34:18 less [1] 126:21 lesson [1] 348:25 lessons [2] 348:8,11 letter [38] 137:25 138:1 138:15 282:1,2,5,19,20 283:13,13,21,22,24 284:7 284:8,9,11,16,20 285:2 285:6,13,23 288:1,3,9 303:21 322:8 323:3 324:11,24 325:2,4,6 327:24 334:13 339:7 340:2 letters [3] 282:9 283:15 283:16 letting [1] 171:6 Letto [1] 286:10 level [18] 21:1 23:25 24:4 32:14,16 115:4,10 149:24 184:23 190:4,25 197:7 256:13 266:21 290:8 343:1 356:20 359:3 levels [1] 87:8 liability [1] 46:19 life [4] 3:13 38:17 42:19 82:2 light [2] 88:25 328:3 likelihood [1] 120:13 likely [27] 8:23 11:9 12:15,20 36:9,18,23 39:4 79:5 110:10,17,22,24 120:12 135:24 137:21 202:8 207:1 213:2 245:7 251:11 253:8,13,16 255:14 275:13 303:22 limited [6] 121:19 122:11 122:17,20,25 126:20 Linda [1] 324:24 line [9] 64:2 87:4 112:22 112:24 113:2 200:19 236:18 324:14 354:14 lines [2] 171:25 244:11 list [15] 60:17 78:15,18 78:24 79:18,23,24 80:3 80:8 116:16 118:8 119:20 207:5 262:13 275:24 listed [4] 73:12,13 80:22 80:24 literally [1] 106:17 litigation [4] 144:5 154:9 154:12 156:24 live [1] 222:22 lives [1] 327:14 local [1] 102:21 logical [1] 68:21 longer [4] 116:16 118:7 190:4 296:23 look [47] 7:25 9:9 15:13</p>	<hr/> <p style="text-align: center;">-M-</p> <hr/> <p>Madam [12] 17:16 21:8 55:15 78:5 86:5 131:3 133:21 135:13 192:3 205:15 301:7 332:20 Madame [4] 101:24 103:8 163:11 172:19 magnitude [1] 31:20 mail [10] 106:19 157:19 245:9 281:23 282:1,5,24 288:2 296:4 327:21 main [1] 290:16 Majesty [1] 1:8 major [1] 358:21 majority [1] 18:15 makes [3] 24:17 40:2 50:5 manage [1] 13:12 managed [1] 150:3 managing [7] 11:21 13:4 14:1 31:13 231:4,11 256:20 manner [4] 65:10 88:15 194:22 349:8 March [10] 113:14</p>	<p>114:21 116:9,23 118:14 119:21 121:9 126:2,4 138:2 Margaret [1] 371:10 margin [2] 98:6 195:20 Marian [1] 340:17 Mark [9] 1:14 3:10,11 156:20 334:5 338:9,10 340:16 345:4 Mary [3] 105:8,9,19 master [1] 79:18 material [27] 30:12,14 143:17 158:6 160:4 161:15,17 162:7,9,13 164:20 185:25 186:5 199:10,15 200:1 201:14 202:3 214:6,17 215:9 222:13 263:4 275:15 310:24 321:24 330:13 materials [50] 10:22 11:20 22:9 26:12 27:10 28:22 31:16 75:21,23 78:8 93:16 94:12,16 141:11 149:1 157:24 158:4,9 160:7 163:17,23 164:3 190:17 191:15 192:5 193:10,14,16 194:9 196:6,12,18,25 197:8 198:17,19,22 199:5 217:2 257:10 258:5 260:24 263:1 264:20 273:7 274:10 296:24 326:15,22 332:21 maternity [4] 44:4 347:25 349:17 351:20 matter [13] 65:9 76:11 83:13 92:14 97:14 98:23 102:22 143:6 166:3 173:25 350:13,16 371:7 Matthews [43] 5:24 6:17 69:25,25 70:12 71:13 72:14 75:2 98:10 105:16 184:14,17 185:4,24 186:9 222:19 232:2 255:6 265:8 269:13,20 274:15,19,24 275:22 284:23 286:12 287:10,13,15 298:22,24 299:1,18 301:9 302:10 302:10,13 333:20 334:15 344:12 345:10 346:6 may [138] 19:5 25:13 46:8 55:7 56:8 58:14,14 59:22 60:21 69:2 83:6 91:13 93:24,25 94:6 106:8 107:22 110:13,13,19 111:2 130:8,10 132:6 137:5 138:16 139:2,8,22 142:19 146:13,14 150:10 154:9 155:19 156:1,14 158:5 159:18 165:13,24 166:20 168:11,16 173:7 173:13,13 175:7 178:4 178:11,16 180:15,15,25 182:9 183:7 184:6 185:3 189:25 193:9 194:13 197:10 203:7,10 206:7 206:22 212:11 213:23 215:25 221:6 222:17 225:24 229:10,21 231:22 235:8,10 237:4,5 239:7</p>

Inquiry on Hormone Receptor Testing

<p>243:3,4,18 245:1,14 247:1 248:21 250:21,22 252:3,14 253:2 254:2 259:13,16 263:8,8,12 265:9 272:15 275:10 277:23 279:8 281:24 286:13 288:25 294:8,11 297:3 299:8 300:17,23 300:25 303:4 304:16 307:3,14 306:21 307:25 311:22,24 312:1 314:8 317:12 318:11,12,18 321:17 327:6 333:15 334:7 353:10 359:6,14 363:3 364:9 367:18 368:15 McKelvey [1] 159:5 mean [29] 26:7 38:17 42:19 45:8 65:10,14 76:16 78:16 80:7 82:12 82:21 86:20 92:2 101:23 163:3 192:19 200:20 236:13,18 237:25 239:4 241:9,12,21 269:4 283:18 330:9 339:18 341:9 meaning [2] 39:5 228:18 means [4] 233:18 300:21 342:14 371:14 meant [3] 4:14 233:24 359:17 meantime [1] 85:10 measure [1] 367:23 measures [4] 52:17 262:10,12 263:8 media [180] 4:22 7:5 8:5 22:25 23:1 29:4 30:1,7 31:14,19,23 32:18 33:16 33:20 45:13 47:6,11,17 49:15,16,21,25 50:10 51:1 53:6,13,25 54:13 54:19 56:10,14 58:23,25 59:2,12,25 60:17 61:12 62:19 63:1 70:19 72:4,6 72:12 73:23 74:6,8,16 89:6,23,25 93:4 101:6 101:13,14,17,25 102:4 102:14 104:12 110:25 111:21 112:1,3,23,25 113:23 114:5 120:12 121:13,18 122:10,17 124:4,6 134:5 135:17,19 135:24 137:1,11,15,21 138:20 141:24 142:6 143:9,13,15,16 144:5 145:5,10 146:12 148:12 148:16,25 149:6,20 152:1 152:4,12 153:25 154:6 154:11,16 156:15 157:4 163:4 164:3 170:8 180:21 180:24,25 182:19,21,23 182:24 184:3 186:20 188:8,9,13 190:18 191:15 194:19 196:12 202:19 212:19 213:5,7 215:2 216:11 218:5,7 222:14 223:21 226:23 230:12 231:5 232:8 233:2 235:4 235:8 236:25 237:16 238:10 239:9 240:6 246:15,16 247:12 248:5 249:12,17 258:6 259:12</p>	<p>259:19 262:25 263:5 264:21 271:17 275:16 276:6 281:14 288:7 318:15 321:14,15 326:21 326:22,22 332:25 338:24 348:22 353:7,14 356:17 356:21 357:21 medical [4] 1:14 21:10 289:7 291:19 meeting [40] 5:14,20 6:8 6:12,17 7:1,7 11:15 12:1 12:8,9,24 13:1,2,25 16:21 17:2,9,13,16,21 20:15 23:4 24:1 49:19 107:8,14 112:16 148:21 155:19,21 156:1,2,5,7 161:10,20 186:18 195:16 354:1 members [12] 1:12 124:9 228:18 243:4,18 245:2 245:19,24 246:5,12,15 246:17 memo [22] 129:11 294:14 294:18,22 295:1,11 296:21 297:23,25 298:10 299:24 300:21 301:13,18 302:8,14 303:14 304:7 304:21,22 305:1 312:12 memory [3] 281:18 323:22 339:12 memos [4] 296:14,24 312:23 313:15 men [1] 83:8 mentioned [8] 10:20 33:13 98:4 122:14 189:1 297:8 351:1,4 mentioning [1] 267:13 messaging [17] 13:3,8,24 14:16 133:4,12 236:8 262:7 283:25 284:4,6 285:16 294:13 301:12 332:2 359:8 360:25 messages [53] 9:2,5,14 10:2 16:4 21:1,3,21 22:2 27:8 90:5,14,22 91:4,21 91:23 92:4,9 93:8,13,20 93:24 94:1,11 118:24 119:3 132:10,15 134:21 134:22 136:2,5 254:3,5 255:17 256:8,16 261:11 262:1 294:14 302:20,21 302:24 303:3 331:3,5,7 331:9,22 359:2,3,21 366:20 messaging [12] 196:21 205:2 239:11 241:10,20 283:14,18 285:14,15 331:25 332:23 342:2 met [2] 57:15 164:1 methods [3] 38:14 39:8 43:2 MHA [10] 221:12,24 222:1 227:18,24 228:9 228:13,15 244:17 259:19 MHA's [1] 258:7 MHAs [6] 221:8 222:3 239:10 242:15 246:5 247:20</p>	<p>micro-managing [2] 184:25 185:1 midnight [1] 196:15 might [15] 77:10 79:5 82:6,22,24 87:5,5 97:17 101:19 142:16 158:25 165:9 168:2 245:2 339:7 Mills [1] 1:8 mind [19] 22:20,23 23:2 23:11 35:20 56:8 65:15 73:19,22 109:24 119:19 172:25 178:18 202:6 226:18 259:6 318:11 321:22 340:5 mine [1] 242:23 minister [254] 4:18 6:13 6:13,24 8:22 10:21 11:13 11:14 12:1 16:9 23:5,7 23:24 24:5 26:5,15 27:4 27:12 28:8 29:13 32:18 32:21 33:9,10,18 34:22 35:19 36:6 37:5,6,10,11 37:24 39:17 44:2 46:23 48:3,17 49:1 51:14 53:15 54:7 59:6,22 61:24,24 61:25 62:10 63:23,23 65:10 66:6,22 67:7 68:16 69:7,8,11,15 70:23 78:25 79:1,24 80:9,20 81:5,11 82:6,21 84:1 85:3 86:7,7 86:23,24 87:11,11 88:8 88:9,12,13 89:19,20 91:8 97:13 103:22,22 104:25 105:24 106:2,6 107:25 109:14,16,19,20 110:4 110:10,15 111:1,6,20,25 112:4 113:16 114:22 115:2,3,9,10,21 117:5 118:5,9 119:25 120:4,5 120:13 121:7,8 127:12 127:15 128:2,11,14,20 129:6,19 130:5,15 133:3 136:6,11,12,18 138:2 140:9,10,21 141:11 148:20 150:7 151:15 152:19 155:13,15 160:20 160:20 170:18,21,23 171:3,23 172:16,20,21 175:19,24 176:2 181:12 182:3,8 186:7,7 190:16 190:24 191:14 192:1,11 192:14,21,22 202:9 203:21 213:25 214:19,23 215:11,25 221:4 228:12 231:22 232:3 233:16,23 234:8,15 236:18 240:25 241:2,3,5 253:3,4,9,14 266:9,10,10,14 268:21 269:16 275:17,18 276:4 294:15 295:13,18,21 299:2,7,9,23 302:21 307:16,13,17 309:1,2,7 309:18 311:11,13,18 312:19 313:2,13 316:11 316:19 317:6,21 319:6 319:14,15 320:9,14,14 326:4,7,10,16 327:17 329:13 331:4,8,13,24 332:24 333:9,15 348:23 349:4 350:7 361:20 minister's [9] 6:9 7:2</p>	<p>26:17 33:5 85:17 116:17 191:23 228:7 307:5 Minister/Robert [1] 316:23 ministers [1] 115:7 Minnie [4] 64:15,22 65:3 65:6 Minnie's [3] 65:25 68:25 111:12 minute [1] 157:20 minutes [16] 60:15 105:15 107:22 120:24 125:25 158:13,25 166:3 181:23 206:21 281:6 296:14 298:9 322:6 369:8 369:12 mislead [2] 97:12 152:8 misleading [3] 162:4 316:14 317:1 miss [1] 112:18 mistaken [1] 307:13 misunderstanding [1] 337:22 mitigate [1] 363:11 mode [2] 151:24 324:20 Moira [1] 167:22 Moira's [2] 237:21 239:14 moment [2] 85:20 219:10 Monday [6] 8:2 37:17 116:9 146:2,5 239:6 monitor [1] 230:4 monitored [1] 150:1 monitoring [2] 230:18 233:3 month [1] 263:12 months [9] 113:13 123:23,24 142:13 253:6 355:18 356:22 358:1 361:17 morning [42] 3:4,6,9 4:9 4:11 8:2,3,11,23 10:13 18:2 22:10 25:23,23 26:5 26:22 28:13,16 34:19 36:20 66:16 67:16 70:20 110:2 116:12 120:19 158:10 196:10,17,21 201:7,9 202:18,21 212:11 239:8 249:6 285:13 324:9 368:20 369:24 370:4 Moss [2] 371:6,21 most [14] 3:20 79:5 102:19 103:12 117:20 152:5 160:1,2 210:8,10 280:7 293:13 311:1 366:8 Mount [3] 18:14 56:24 290:3 move [4] 73:16 78:2 209:17 228:16 moved [1] 73:5 MQ [2] 338:9,10 Ms [1451] 2:2 3:2 4:6,9 4:10,13,17 5:1,7,14,16 5:21,24,25 6:5,17,19,23</p>	<p>7:9,11,17,22,25 8:1,7,12 8:19 9:6,11,16,20,24 10:3,9,11 11:2,11 12:3 12:10,22 13:7,11,18,23 14:13,20,24 15:4,10,21 15:23 16:5,11,17,25 17:14,23 18:2,5 19:2,20 20:1,13,22,24 21:7,15 21:16,23 22:7,8,14,21 22:22 23:22 24:8,13 25:18,25 26:3,10,19,25 27:5,14,19,23 28:4,9,14 28:18,20 29:1,5,9,18,22 30:3,15,21,25 31:5,9,12 31:24 32:5,10,11,12,24 33:7,17 34:1,10,14,19 34:25 35:3,3,7,11,16 36:8,14,19,19,22 37:2 37:11,18,20 38:1,9 39:3 39:12,23 40:3,10,18,23 41:8,17 42:1,5,10,16 43:7,10,15,19,25 44:8 44:16 45:3,9,23 46:2,10 46:20 47:2,7,13,16,20 47:24 48:4,11,16,25 49:2 49:7,12,22 50:14,22 51:2 51:7,11,13,20 52:3,7 53:2,7,16,19 54:2,5,10 54:14,22 55:2,13,18,24 56:6,19 58:6,12 59:1,9 59:14,18,23 60:7,14,20 60:24 61:16,23 62:4,12 62:13,17,21 63:2,7,13 63:15,20,22 64:3,9 65:18 66:3,10,18,20,25 67:1,8 67:12,17,19,22,25 68:8 68:12,13,21 69:1,2,10 69:17,24,25 70:3,9,12 70:13 71:1,2,6,12,13,18 71:23 72:3,9,14,17,21 72:25 73:11,21 74:11,15 74:21 75:2,2,6,10,17 76:14,19,23 77:7,12,16 77:21 78:4,17 79:9,15 79:22 80:2,6,16 81:14 81:19,24 82:8,14,18 83:2 83:9,16,23 84:5,11,16 84:24 85:7,14 86:4,17 87:9,18 88:5,20 89:2,9 89:11,13,18 90:1,9,15 90:24 91:3,15,24 92:5 92:11,18,23 93:10,15,17 93:22 94:14 95:9,17 96:1 96:6,15,20 97:2,7,20 98:10,10,13,19 99:2,13 99:17 100:1,6,7,11,19 100:23 101:2,10,21 102:16,24 103:6,19 104:13,18 105:3,8,10,16 105:16,22 106:14,15,22 106:25 107:11,15,20 108:2,8,18,24 109:11 110:5,12,18,23 111:16 111:24 112:5,14,20 113:5 113:10,19,24 114:8,13 114:17,18,23 115:6,15 115:22 116:4,8 117:1,12 117:24 118:11,15,19 119:9,15,22 120:3,11 121:2,4,5,8,25 122:1,13 122:22 123:2,7,11,12,17 123:18 124:1,2,11,14,17 124:23 125:3,4,9,17,21</p>
--	---	---	--	--

126:8,14,23 127:5,6,10 127:19,22,24 128:4,8,24 129:8,14,21 130:7,14,17 130:21 131:1,12,21,22 132:8,12,23 133:5,13,20 134:4,12,14,16,17,19 135:7 136:4,16,22 137:4 137:12,22 138:14,22,25 139:7,23 140:3,19,21 141:2,7,13,20 142:2,8 142:18,20,25 143:1,21 144:1,17,21 145:1,4,7,8 145:12,14,18,22 146:1 146:15,18,21,25 147:5,8 147:9 148:1,3,8,11,14 148:24 149:13,16,22 150:11,15,21,25 151:4,8 151:13,20 152:18,22 153:3,10,16,20,23 154:7 154:19,22 155:3,8,10,14 155:22 156:3,8,12,13 157:5,7,12,15,19 158:1 158:7,16,19,21,24 159:17 159:24 160:1,11,18,23 161:6,12,23 162:3,15,20 163:9 164:6,11,17 165:3 165:8,9,12,23 166:3,5 166:10,16,21 167:1,4,6 167:10,13,17,22 168:5,9 168:13,20,24,25 169:3,4 169:9,15,19,24 170:5,6 170:12,13,17,22 171:5 171:13,20 172:1,6,10,18 173:4,16,21,22 174:2,8 174:13,21 175:2,6,13,20 175:25 176:5,9,12,14,20 177:1,4,7,13,20 178:1,6 178:13,19,20 179:3,7,12 179:18,23 180:2,6,9,10 180:14,16,22,23 181:6 181:11,14,15,16,22,25 182:2,11,15 183:1,8,11 183:12,15,20 184:1,9,13 184:14,16,18 185:4,6,12 185:16,21,24 186:3,9,11 186:16,24 187:6,11,17 187:23 188:3,7,19,20 189:6,11,15,20 190:12 190:21 191:3,8,17 192:2 192:8,15,25 193:5,12,24 194:3,16,25 195:10,14 195:19 196:1,7,13 197:1 197:6,13,16,18,23 198:3 198:8,13 199:3,12,17,22 200:2,6,10,14,18 201:3 201:8,17,23 202:4,12,17 203:2,5,8,10,13,20 204:1 204:7,11,15,22 205:5,10 205:14,18,24 206:3,8,12 206:20,22,24 207:6,8,14 207:25 208:4,9,14,17,19 208:23,24 209:7,8,22 210:3,15,21,25 211:4,12 211:18,23 212:6,9,21,23 213:8,9,9,10,13,18,19 213:24 214:9,14,20,24 215:6,12,22 216:5,10,19 216:21 217:1,5,11,12,12 217:15,17,22 218:3,15 218:23 219:8,15,17,19 219:22 220:1,11 221:3 221:15,19,25 222:7,11 222:17,18,19 223:1,2,6	223:10,13,15,23 224:7 224:10,12,16,19,21,24 225:1,9,14,19,25 226:2 226:8,9,12,15,21,25 227:6,10,13,15 228:4,5 228:20 229:3,22 230:1,3 230:16,23 231:3,13,17 231:20 232:2,2,3,4,9 232:14,20,24 233:1,7,22 234:3,11,18 235:1,15 236:2,11,17,23 237:7,9 237:23 238:8 239:3,10,3 239:19,24 240:8,13,18 240:22 241:9,13,23 242:4 242:9,13,16 243:2,13,21 244:4,9,17,19,23 245:3 245:16,20 246:3,13,21 247:1,10,22 248:2,9,14 248:19,20 249:1,18,23 250:2,6,10,15,20 251:2 251:6,10,14,19 252:1,2 252:10,15,24 253:7,15 253:20,25 254:2,6,12,20 254:24 255:6,8,18,24 256:3,9,17,21 257:4,6 258:1,3,7,8,13,18 259:5 259:10 260:1,6,11,21 261:2,8,19,22 262:2,15 262:19,24 263:9,15,20 264:1,6,22 265:2,5,17 265:22 266:3,8,15,19 267:2,6,20 268:1,12,20 269:3,8,13,20,24 270:4 270:10,25 271:5,11,22 272:8,24 273:5,12,18 274:2,8,19,20,24 275:3 275:12,22 276:2,9,16,21 276:22 277:2,10,15,16 277:18 278:2,6,7,11,17 278:23 279:4,9,15 280:4 280:15,19,20 281:1,7,15 281:19,22,25 282:4,7,14 282:22 283:6,10,19 284:1 284:5,12,24 285:3,8,19 285:25 286:6,14,15,16 286:19,23 287:1,3,8,10 287:11,13,15,16,18,21 287:23 288:1,8,13,22,24 289:4,8,12,17 290:6,15 291:1,10,17 292:3,8,13 292:18,25 293:6,11,20 294:1,7,11,12,17 295:3 295:7,12,17,22 296:4,5 296:9,16 297:5,9,15,18 297:20 298:3,8,21,24,25 299:1,1,6,15,18,20,25 300:3,4,8,12,14,16,22 301:1,4,6,9,10,12,15,19 301:22,25 302:5,9,10,10 302:13,16,23 303:3,5,10 303:15,19 304:3,6,9,13 304:18,22,24 307:11,21 306:4,8,12,15,20 307:4 307:8,9,14,19,24 308:4 308:8,9,11,11,13,18,23 309:4,9,15,21 310:1,6 310:11,23 311:10,14,19 311:23 312:8,13,20 313:3 313:7,14,16,19,24 314:6 314:15,21 315:5,13,18 315:19,21 316:1,4,6,20 317:10,24 318:8,17,20 318:22 319:5,17,25	320:12,19 321:6,10,18 322:12,14,18,19 323:1,8 323:11,12,16,20,25 324:1 324:8,10,16 325:1,8,13 325:17,25 326:9,14,20 327:1,5,9,16,16,19,25 328:5,11,15 329:3,21 330:6,11,21,24 331:12 331:17,23 332:4,14,18 333:4,11,16,20,20,20,25 334:15,17 335:2,6,10,16 335:20,24 336:4,11,15 336:20,24 337:11,12,16 337:19,24 338:2,3,11,25 339:2,9,14 340:10,19,25 341:8,21 342:10,23 343:7 343:19 344:2,8,11,12 345:9,10,11,15,20,21,24 346:2,5,6,7,13,14,16,19 346:23 347:5,10,15,20 347:23 348:3,10,16 349:20 350:1,15 351:10 351:18 352:1,4,8,12,17 353:17,21,24 354:10,11 354:15 355:5,13 356:2,6 356:10 357:1,6,11,17,25 358:6,12 360:1,8,12,17 360:21 361:1,5,9 362:14 362:20 364:7,17,24 365:4 365:16,20 366:7,13,17 366:21 367:1,5,11,17 368:5,8,12,25 369:1,4,5 369:7,11 370:6	77:21 78:4,17 79:9,15 79:22 80:2,6,16 81:14 81:19,24 82:8,14,18 83:2 83:9,16,23 84:5,11,16 84:24 85:7,14 86:4,17 87:9,18 88:5,20 89:2,11 89:13,18 90:1,9,15,24 91:3,15,24 92:5,11,18 92:23 93:10,22 94:14 95:9,17 96:1,6,15,20 97:2,7,20 98:13,19 99:2 99:13,17 100:1,7,11,19 100:23 101:2,10,21 102:16,24 103:6,19 104:13,18 105:3,8,10,22 106:15,25 107:11,15,20 108:2,8,18,24 109:11 110:5,12,18,23 111:16 111:24 112:5,14,20 113:5 113:10,19,24 114:8,13 114:18,23 115:6,15,22 116:4 117:1,12,24 118:11 118:15,19 119:9,15,22 120:3,11 121:4,5 122:1 122:13,22 123:2,7,12,18 124:2,11,23 125:4,9,17 125:21 126:8,14,23 127:5 127:10,19,24 128:4,8,24 129:8,14,21 130:7,17,21 131:1,12,22 132:9,12,23 133:5,13,20 134:4,12,19 135:7 136:4,16,22 137:4 137:12,22 138:14,23,25 139:7,23 140:3,19 141:2 141:7,13,20 142:2,8,18 143:1 144:1,17 145:1,8 145:14,22 146:15,21,25 147:5,9 148:3,8,14 149:13,16,22 150:15,21 150:25 151:4,8,13,20 152:18,22 153:3,10,16 153:20,23 154:7,19,22 155:3,8,14,22 156:3,8 156:12 157:7,15 158:1,7 158:16,21 159:17,24 160:11,18,23 161:6,12 161:23 162:3,15,20 163:9 164:6,11,17 165:3,8,12 165:23 166:5,10,16,21 167:1,6,10,17 168:5,13 168:20,24 169:3,15,19 169:24 170:5,12,17,22 171:5,13,20 172:1,6,10 172:18 173:4,16,21 174:2 174:8,13,21 175:2,6,13 175:20,25 176:5,9,14,20 177:1,7,13,20 178:1,6 178:13,19 179:3,7,12,18 179:23 180:2,6,10,22,23 181:6,11,16 182:2,11,15 183:1,8,11,15,20 184:1 184:9,13,18 185:6,12,16 185:21 186:3,11,16,24 187:6,11,17,23 188:3,7 188:20 189:6,11,15,20 190:12,21 191:3,8,17 192:2,8,15,25 193:5,12 193:24 194:3,16,25 195:10,14,19 196:1,7 197:1,6,13,18,23 198:3 198:8,13 199:3,12,17,22 200:2,6,10,14,18 201:3 201:8,17,23 202:4,12,17	203:2,10,13,20 204:1,7 204:11,15,22 205:5,10 205:14,18,24 206:3,8,12 206:20 207:8,14,25 208:4 208:9,14,19,24 209:7,22 210:3,15,21,25 211:4,12 211:18,23 212:23 213:8 213:13,18,24 214:9,14 214:20,24 215:6,12,22 216:5,10,21 217:1,5,11 217:17,22 218:3,15,23 219:18,19,22 220:1,11 221:3,15,19,25 222:7,11 223:2,6,10,15,23 224:7 224:12,16,21 225:1,9,14 225:19 226:9,15,22,25 227:6,15 228:4,5,20 229:3,22 230:3,16,23 231:3,13,17,21 232:9,14 232:20 233:1,7,22 234:3 234:11,18 235:1,15 236:2 236:11,17,23 237:23 239:3,10,3,19,24 240:8 240:13,18,22 241:9,13 241:23 242:4,9,13 243:2 243:13,21 244:4,9,17,19 245:3,16,20 246:3,13,21 247:10,22 248:2,9,14 249:1,18,23 250:2,6,10 250:15,20 251:2,6,10,14 251:19 252:1,10,15,24 253:7,15,20 254:1,6,12 255:24 256:3,9,17 257:6 258:3,13,18 259:5,10 260:1,6,11,21 261:2,8 261:19,22 262:2,15,19 262:24 263:9,15,20 264:1 264:22 265:2,6,17,22 266:3,8,15,19 267:2,6 267:20 268:1,12,20 269:3 269:8,24 270:4,10,25 271:5,11,22 272:8,24 273:5,12,18 274:2,8,20 275:3,12 276:2,9,16,22 277:2,10,18 278:7,11,17 278:23 279:4,9,15 280:4 280:15,20 281:15,19 282:4,7,14,22 283:6,10 283:19 284:1,5,12,24 285:3,8,19,25 286:16,23 287:3,8,18,23 288:1,8 288:13,24 289:4,8,12,17 290:6,15 291:1,10,17 292:3,8,13,18,25 293:6 293:11,20 294:1,7,17 295:3,7,12,17,22 296:5 296:9,16 297:5,9,15,18 297:20 298:3,8,25 299:6 299:15,20,25 300:4,8,16 300:22 301:1,6,15,19,25 302:5,9,16,23 303:5,10 303:19 304:3,9,13,18,24 307:11,21 306:4,8,15,20 307:4,9,14,19,24 308:4 308:8,13,18,23 309:4,9 309:15,21 310:1,6,11,23 311:10,14,19,23 312:8 312:13,20 313:3,7,16,24 314:6,15,21 315:5,13,18 316:1,6,20 317:10,24 318:8,17 319:5,17,25 320:12,19 321:6,10,18
--	---	---	---	---

Inquiry on Hormone Receptor Testing

<p>322:14,19 323:8,12,16 323:20 324:1,16 325:8 325:13,25 326:9,14,20 327:1,5,9,19,25 328:5 328:11,15 329:3,21 330:6 330:11,21,25 331:12,17 331:23 332:4,14,18 333:4 333:11,16,25 334:17 335:2,6,10,16,20,24 336:4,11,15,20 337:11 337:16,24 338:11 339:1 339:2,9,14 340:10,19,25 341:8,21 342:10,23 343:7 343:19 344:2,8 345:11 345:15,21 346:2,7,13,16 346:19,23 347:5,10,15 347:20,23 348:3,10,16 349:20 350:1,15 351:10 351:18 352:4,12,17 353:17,24 354:11,15 355:5,13 356:2,6,10 357:1,6,11,17,25 358:6 358:12 360:1,8,12,17,21 361:1,5,9 362:14,20 364:7,17,24 365:4,16,20 366:7,13,17,21 367:1,5 367:11,17 368:5,8,12 370:6 must [5] 159:6 180:17 324:14 337:21 363:16</p>	<p>114:22 262:12 359:7 363:19 365:24 Newbury [2] 1:15 369:7 Newfoundland [4] 37:15 233:13 371:12,16 news [60] 4:19 9:1,5,10 9:21 11:19 16:3 18:3,20 19:7 27:8 29:12,13 30:1 34:5 37:14,18 52:5 53:17 53:21 89:7,22 112:12,13 112:18 188:10 204:20 217:9 224:2 229:12,25 230:4 231:8 244:13,14 254:8 255:20 265:10,12 265:21 267:11 268:8 270:8 273:3,10 317:11 317:12,13 336:25 337:4 337:21 361:14,25 362:10 362:11,16,17 364:4,5,6 newscast [1] 286:17 newspapers [3] 102:20 278:1 281:10 Newsworld [2] 222:21 229:14 Newsworld's [1] 222:21 next [18] 38:24 57:14 66:8 67:16 70:17 86:1 113:12 121:17 129:18 138:23 139:1,22 166:20 168:19 178:16 237:4 281:24 324:8 nic [2] 82:3 162:11 night [7] 37:12 52:5 56:21 63:24 64:2 105:1 110:10 nine [11] 24:17 25:16 78:1 84:20 92:23 93:7 94:13 157:2 193:19 195:1 264:10 NL [3] 1:8,14,15 nobody [5] 28:24 29:16 29:21 89:11 142:5 nobody's [1] 243:19 Nolan [6] 70:1,1 75:2 98:11 105:16 265:9 none [1] 140:6 noon [3] 70:20,21 272:15 Nor [2] 46:14 54:13 norm [4] 343:21 361:4,6 364:9 normal [8] 87:14 90:12 163:3 248:24 329:20,22 347:9 362:12 normally [11] 100:12 102:14 107:16 109:13 138:17 188:8 329:25 335:9,11 346:17 366:24 note [89] 37:24 39:19 48:13,18 66:19 67:3,5,6 69:4 70:17,24,25 72:8 74:2,25 75:12,14 81:5 83:12 86:12 88:22,24 89:12,17,20 90:4,6 91:6 91:13 93:9,13,17 94:13 95:4,7,11 96:19,25 97:24 98:10,16,20,25 99:8 100:5,14 101:18 102:7</p>	<p>104:2,3 105:18 106:22 108:1,7,16 109:25 116:18 116:22 118:20 125:11 126:3,11 129:12 132:1,2 132:3,11 134:24 135:2 136:10,19 156:15 160:3 203:8,9,24 204:5 205:4 205:23 207:13 233:17 234:20 236:25 239:12 249:15 264:19 280:7 310:9,25 noted [1] 221:10 notes [47] 73:2 74:9 78:12 79:19 80:12,13 81:9 87:14,25 88:6,16 93:20 100:13 102:1 106:3 106:3 107:7 108:20,25 109:2 116:11,13,16,21 116:22,25 117:11,15 118:3,8,10,22 119:3,5 135:13 170:11 203:12 226:6 257:10 265:11 271:18 310:15,20 325:20 326:19,21 329:13 noteworthy [3] 38:8 39:22 40:2 nothing [11] 5:9 32:14 32:15 35:19,22 36:17 49:23 50:1 133:14 195:23 339:18 notice [3] 118:21 349:17 351:15 noticed [2] 247:3 310:12 notification [8] 88:25 220:19 257:1 271:15 279:6,14,18 315:4 notified [3] 32:12 213:5 280:2 notify [6] 32:9,10 124:8 152:1 224:3 279:22 noting [1] 269:14 November [35] 11:14 12:2,17 16:21 18:23 20:10 21:16 23:5 39:21 43:9 44:18 49:19 51:15 52:6 54:6 55:6 69:21 95:4,24 96:25 97:22 128:18 129:11 140:11 147:14 148:19,19 161:10 161:20 162:2 164:5 189:17 218:13 252:23 264:17 now [82] 12:15 21:15 22:24 23:3 24:7 25:5 34:23 44:8,19 45:16 47:5 48:9 49:15 50:2 57:4 65:15 70:20 72:24 79:8 82:2 87:1 91:9 92:24 95:7,15 99:24 108:9 109:5 110:2 113:9 116:1 121:21 123:23 126:1 144:4 146:1 147:21 149:16 150:13,14 151:21 151:24 152:11 153:23 154:4 161:19 162:13 166:2 184:25 190:1 192:22 194:13 196:15 203:10 209:14 213:23 219:15 228:21 233:11 239:6 244:10 249:15</p>	<p>253:2 257:12 261:19 270:11 272:18 276:20 283:11 284:6 294:16 316:5,18 325:22 327:12 328:19 330:25 333:10 345:9 350:3 355:1,9 NTV [2] 56:21 57:14 NTV's [1] 57:16 number [51] 19:1,10,11 19:12,14,14,16,17 20:22 25:13 30:7 57:2,4 73:4,6 73:6,7,12,14,16 78:2,3 82:23 84:12,20,21,21 98:5,5,5 111:3 116:2 156:23 159:3 193:21 195:1 212:1 232:1,7 237:7 242:23,24 249:15 262:10 264:12 280:11 281:1 296:8 311:7 326:2 340:4 numbers [49] 17:3,7,11 17:17 18:22,25 19:4,5,6 19:9,19,21,22 20:16 21:2 21:6,12 23:2 24:3,18,19 25:8,10 32:19,23 33:3 50:13 52:21 61:15 95:1 95:3,6,24 98:1 128:17 128:17,21 139:18 153:6 163:22 164:25 190:20 193:23 195:3,4,7 220:18 265:1 341:9 numerous [2] 110:25 159:9</p>	<p>occassion [5] 117:14,16 233:8 364:9 365:5 occur [3] 63:17 201:16 201:19 occurred [8] 25:8 65:1 89:6 91:20 93:2 132:22 201:11 235:17 occurs [1] 107:1 October [3] 4:16,23 281:10 off [9] 26:20 80:13 107:6 139:9 146:1,4 155:21 170:19 171:12 offer [2] 15:2,6 offered [1] 199:1 offering [2] 199:7 244:23 office [54] 31:4 70:5,8 72:14 73:25 74:10,24 75:3 76:16 78:8 80:11 85:12,21,23 86:10,15 87:13,23 97:13 99:3,5 100:6 101:19 102:1 103:5 104:5,11 110:1 139:10 139:21 140:2 170:25 184:7 185:25 215:21,24 245:7 254:14,21,25 265:23 270:20,23 276:15 277:1,8 311:25 312:4 314:3,9 329:14,16,19 330:2 officer [1] 280:11 offices [1] 246:8 official [3] 86:21 87:10 88:2 officials [14] 8:14 23:1 23:25 24:4 26:12 30:9 30:19,19 38:12 44:10 46:15 61:5 148:20 194:23 often [2] 111:6 364:1 old [1] 3:10 once [11] 76:7 121:19 123:15 294:15 302:20 314:7 322:8,23 323:3 333:10 350:20 oncologist [1] 280:1 oncologists [1] 18:19 one [81] 12:17 15:16 21:5 33:15 34:2,20 51:23 57:11 64:16 72:10 73:17 77:2 78:2,3 83:13 87:2 88:25 90:19 91:12 99:8 99:12 102:21 104:9 105:7 108:22 109:3 112:24 113:7 117:2 118:25 159:9 159:20 182:16 210:12,16 213:21 218:11,20 226:1 227:13 228:9 246:4 257:17 267:12,14 272:12 272:23 275:1,5 282:9,9 282:15,17 290:16 291:4 291:12,18,18,19 292:23 296:22 300:20 317:19 326:15 328:24 338:24 348:17 352:23 354:14,20 355:2,2,8,19 356:23 362:7 363:4,4,6,14 367:23 ones [2] 81:9 112:9</p>
-N-				
<p>name [1] 297:8 named [2] 213:7 266:2 names [2] 116:7 123:1 natural [1] 118:24 nature [3] 331:19 348:9 363:13 neat [1] 82:3 necessarily [11] 21:2 73:3,5,15 84:6 132:7 137:18 164:4 261:3 285:17 362:6 necessary [5] 79:2 213:22 228:1 282:19,21 need [34] 31:15 33:16 47:16 65:12,14,22 66:22 68:17 86:10 88:13 105:1 110:16 111:6,10 159:7 168:10 180:19 212:14 219:14 227:25 228:16 229:6 242:17,19 244:2 300:3 328:21 338:16 340:6,7 342:19 343:18 368:20,23 needed [6] 86:15 173:3 225:5 238:1 244:25 340:23 needs [2] 69:12 237:11 negative [7] 18:13 25:1 25:3 61:7 363:11 364:4 364:5 negatives [1] 19:13 never [9] 19:6 47:1 56:15 56:15 125:11,15 135:17 205:6,23 new [12] 38:14 39:8 43:2 104:3 106:3 109:17,19</p>				
-O-				

<p>ongoing [2] 5:9 224:15 onus [1] 349:11 onwards [1] 54:18 open [22] 34:24 59:4,13 71:14,24 72:1,2 73:22 73:25 74:7 78:7 89:5 94:3 101:12 102:5 107:3 112:22 228:3 246:20 304:12 311:24 324:14 opened [10] 30:5 74:24 99:20 108:11 119:8,14 303:21 304:2,17 305:2 opening [6] 79:17 85:13 86:1 99:6 105:25 109:6 opens [6] 34:23 35:1 36:3 71:4,5 304:14 operates [3] 233:12 234:10 235:6 operating [1] 233:21 operational [1] 150:3 operations [1] 235:7 opinion [4] 344:7 367:8 367:9,14 opportunities [1] 159:12 opportunity [7] 106:7 136:7 188:13 211:5 216:12,14 218:6 opposed [10] 3:21 17:6 104:2 106:18 127:1 137:10 183:13 298:20 338:7 341:10 opposite [1] 324:25 opposition [9] 135:20 135:24 187:21 188:2 237:15 238:9 269:4 316:13 324:19 order [8] 80:25 82:3 203:16 204:24 206:14 247:13,14 340:22 organization [4] 213:10 271:15,24 348:20 organized [2] 82:13 259:14 organizing [1] 212:19 original [12] 19:13 48:18 87:21 104:20 160:4,7 163:17 164:20 257:19,23 269:15,23 originally [2] 18:13 222:18 Osborne [10] 49:1 63:23 65:10 70:23 115:3,10 241:2 252:22 253:4,9 Osborne's [2] 104:25 175:24 Oscar [1] 18:10 otherwise [4] 112:16 202:11 284:22 353:12 Ottenheimer [4] 115:2 115:9,21 240:25 Ottenheimer's [1] 175:19 ought [1] 87:1 ourselves [1] 369:22</p>	<p>outcome [2] 6:15 7:3 outcomes [1] 237:13 outdated [2] 209:16 210:14 outline [3] 356:15 359:19 360:5 outlined [2] 11:15 19:7 outlines [1] 270:16 outside [10] 114:11 178:22,22 179:2,6,16 180:1 187:12 244:6 292:23 outstanding [1] 229:17 overall [9] 19:1 52:21 193:21 217:25 218:4 259:16 358:3 359:15 367:20 overlooked [3] 61:17 62:2 147:2 overview [1] 156:4 owed [1] 152:11 own [14] 13:20 89:12 107:5 202:5 233:2 262:25 276:12 289:23 290:9 326:11 333:24 344:7 350:5 355:11</p> <hr/> <p style="text-align: center;">-P-</p> <hr/> <p>P [1] 297:2 P-0031 [1] 195:22 P-0104 [3] 7:25 92:2,8 P-0125 [1] 129:24 P-0126 [2] 129:25 131:25 P-0128 [1] 273:9 P-0173 [1] 4:13 P-0197 [1] 94:8 P-0203 [1] 121:5 P-0206 [1] 227:9 P-0209 [1] 239:6 P-0227 [2] 313:10,19 P-0230 [1] 316:10 P-0231 [1] 321:21 P-0279 [1] 113:9 P-0428 [2] 52:2 352:21 P-0445 [1] 231:20 P-0457 [1] 281:22 P-0458 [1] 284:15 P-0460 [1] 285:11 P-0475 [1] 327:12 P-0831 [1] 191:11 P-0832 [1] 202:16 P-0835 [1] 220:25 P-0850 [3] 269:12 272:5 272:12 P-0869 [1] 242:12 P-0870 [1] 246:24 P-0872 [1] 253:25 P-0875 [1] 265:5 P-0876 [1] 267:10 P-0880 [2] 274:13 275:20 P-0882 [1] 272:13</p>	<p>P-0887 [1] 280:24 P-0959 [1] 324:7 P-0962 [1] 325:17 P-1000 [1] 344:11 P-1097 [1] 69:23 P-1222 [1] 180:13 P-1225 [1] 206:16 P-1226 [2] 221:22 222:16 P-1227 [1] 225:23 P-1262 [1] 295:25 P-1414 [2] 137:7,25 P-1416 [1] 281:4 P-1456 [1] 63:20 P-1612 [2] 100:4 105:6 P-1614 [3] 285:22 286:3 286:4 P-1615 [1] 294:10 P-1616 [1] 303:13 P-1619 [1] 333:19 p.m [17] 37:13 70:16 105:14 121:9 167:9 180:16 221:6 225:25 229:11,13 232:4 247:2 248:22 254:3 321:1 322:5 370:12 P0886 [1] 277:13 package [17] 59:25 60:3 93:16 141:17 158:9 217:2 263:5 296:23 298:15,15 300:5,7,20 312:2 313:6 342:20 343:14 page [30] 10:2 12:17 15:13 18:1 20:18 24:7 24:16,16 34:17 38:11 39:6 42:25 52:2 56:20 57:8 92:22 97:21,23 131:25,25 180:19 273:10 275:24 281:4 317:1 352:22 353:2,4 363:7,14 pages [8] 8:21,24 9:1 12:16,16 27:25 195:2 345:1 paid [2] 40:24 363:23 pairing [1] 362:10 Pamela [1] 1:12 panel [1] 18:19 paper [1] 358:20 paragraph [12] 18:9 38:10,10 39:6 42:25 50:5 50:16 58:18 138:6 159:19 159:20,25 pardon [2] 205:9,17 part [26] 47:5 52:14 53:18 60:2 97:11 104:1 117:8,21 127:17 129:17 131:16 227:14,16 233:4 260:20 288:9 293:13 298:14 300:5 332:19 347:8 359:15 362:21,24 367:18,20 participating [1] 29:13 particular [25] 58:13 64:12 66:21 67:17 81:3 81:6,15 82:23 88:10 106:11 133:18 165:19</p>	<p>168:1 211:16 240:2 293:17 319:10,13 329:11 355:14 356:19 361:10 362:1,10 367:21 particularly [1] 256:25 parties [2] 221:8 370:11 parts [1] 90:12 party [1] 133:18 pass [1] 229:18 passed [3] 52:15 310:4 311:11 passing [2] 106:17 309:18 past [8] 34:6 64:20 96:11 111:22,22 112:12 235:8 368:9 pasted [2] 157:2 265:11 pathologist [3] 137:1 138:5,8 pathologists [2] 18:19 133:23 pathology [3] 134:6 138:10 296:15 patient [24] 64:15,15 121:14 122:21 123:1 220:18 256:25 257:13 259:3 261:15 271:15 272:17,19 279:5,14,18 280:10,11 314:13 315:3 317:15,22 318:12 319:11 patient's [1] 18:16 patients [54] 18:17,25 19:14,18 20:20 25:4 37:15 43:4 52:11,14 53:1 57:3,25 64:16 105:19 122:17 123:6 220:22 237:17 257:11,16 262:12 264:11,12,13,14 265:16 269:18,21 270:9,16 273:24 274:17 279:20,22 280:7 314:22,23,25 315:9 317:2 318:6,15 319:7,21 319:24 320:2,4 322:3,4 322:9,11,24 323:6 paying [2] 50:7 64:13 pending [4] 61:4 154:8 154:12 156:24 Penney [1] 307:8 people [51] 3:25 18:22 21:18,19 22:5 24:21 25:13 38:18 42:20 52:15 57:21,22 60:18 61:19 65:4 68:18 86:16 103:13 106:4 107:4 117:17 135:23 142:15 155:5,10 222:23 229:5 232:1,13 232:15,19 234:4 235:8 235:10 237:7 238:1,2 246:1,7 256:20 272:15 275:21 276:14,20,25 277:5 291:19 324:23 327:18 328:4 361:21 per [3] 23:4 248:22 249:4 perceive [1] 14:11 perceived [4] 13:12 15:5 80:19 143:18 percent [9] 20:4 56:15</p>	<p>56:17 98:6 139:15 195:20 233:15 275:2,5 perhaps [25] 14:6 24:18 37:18 38:5 46:17,18 65:23 77:3,4 84:17 87:7 102:11 130:5 136:25 137:8 163:20 185:13 199:2 209:8 223:16 294:20 302:1 355:25 361:25 362:11 period [11] 18:11 45:11 115:2 159:7 173:12 288:7 316:12,24 353:22 355:22 370:5 permission [1] 284:20 person [7] 33:15 41:19 45:7 116:24 286:21 287:1 341:2 personal [4] 154:20 190:11 344:7,20 personally [1] 131:15 perspective [29] 11:21 14:3 24:2 31:25 32:3,6 54:21 68:1 135:22 136:6 138:22 150:4 151:23 260:23 292:20 348:6,7 348:17 351:17 352:5,7 352:19 354:7 356:16,17 358:17 359:18,21 361:16 pertaining [2] 81:3 354:18 pertinent [2] 96:14 109:9 perturbed [2] 147:4,10 Peter [3] 37:24 40:7 57:17 Pgs [1] 2:3 phone [11] 242:22,24 244:24,24 270:23 271:9 271:12,23 293:9 307:8 322:8 phoned [1] 143:21 phoning [2] 244:23 298:7 phrase [2] 46:7 285:15 physician [7] 270:14 272:21 273:4 280:1 293:15,16 317:16 physicians [8] 290:20 292:23 322:1,2,9,10 323:3,5 Picard [1] 327:15 pick [3] 143:16 148:15 287:9 picked [5] 145:10 148:12 160:15 249:22 287:6 picking [2] 149:19 161:2 picture [1] 193:17 piece [7] 38:5 52:22 56:7 57:11 220:14 257:1 279:6 Pike [9] 1:14 3:10,12,16 3:17,24 4:4 369:14,15 pinpoint [1] 65:2 place [19] 6:4 7:6 33:25 52:18 64:7 77:10 107:2 156:7 186:19 213:6</p>
--	---	--	--	--

<p>216:20 219:2 221:10,13 229:2 237:5 258:17 290:25 292:2</p> <p>places [1] 363:6</p> <p>plan [27] 150:12 355:9 355:12,15,20 356:11,13 356:14,19 357:4,10,13 357:21 358:3,14,23 359:12,15,16 361:14 362:3,6 364:3 365:10,12 365:21 366:5</p> <p>planned [2] 33:9 162:8</p> <p>planning [1] 11:23</p> <p>plans [4] 184:22 354:16 354:23 362:7</p> <p>play [1] 347:4</p> <p>pleased [2] 217:25 229:20</p> <p>point [128] 4:21 5:4,23 6:3 7:20 10:23 12:9,14 12:14 13:15,17 16:16 19:12,15 22:19 24:21 27:10 28:7 33:20 36:20 40:8,9 41:1,15 42:9,14 42:21 43:18 47:23 48:2 48:10 51:13 55:6 62:18 69:14 72:11 79:4 86:3,8 92:9 94:18 100:22 102:10 107:2,25 109:24 125:11 126:2,24 129:2 130:3 131:4 135:9 137:2,9 140:13 141:10 147:10,11 150:13 151:15 154:11,13 154:20 155:4 158:8 159:18 160:12 163:13,20 164:21 165:15 169:13 170:4 182:21 183:1 184:24 186:15 189:2,4 189:24 190:3 197:8 201:14 202:8,14 208:7 215:24 216:2 220:6 226:21 227:3 230:15 231:12,16 232:19 234:13 234:24 235:2,4,16,19,22 241:11 248:10 249:9 251:2,11 259:21 263:3,7 268:17 270:18 273:23 279:13 288:16 289:24 314:16 316:18 320:9,14 321:11 323:22 342:17 348:18 349:25 350:2 365:7</p> <p>pointed [4] 52:23 127:22 128:20 133:10</p> <p>pointing [1] 234:2</p> <p>points [11] 22:4 47:17 143:9 170:25 174:4 256:23 258:5 270:15 350:22,24 353:3</p> <p>policy [1] 221:4</p> <p>poll [4] 367:9,20,23 368:3</p> <p>Porter [1] 352:25</p> <p>portion [6] 93:7 94:13 214:12 261:25 284:11 296:23</p> <p>pose [1] 220:4</p> <p>posed [7] 91:7,10 218:12 228:6 278:5 318:19,21</p>	<p>position [8] 118:25 151:21 152:11 161:9 277:16 287:2 344:19 351:14</p> <p>positive [4] 25:2 61:7 64:19 361:15</p> <p>possession [6] 95:5 96:24 126:16 263:19 264:19 312:17</p> <p>possibility [2] 137:15 322:2</p> <p>possible [6] 94:4 138:4 301:22 303:15 321:25 322:4</p> <p>Possibly [1] 278:18</p> <p>potential [7] 38:12 44:9 44:15 46:14 137:14 138:19 364:4</p> <p>potentially [4] 159:13 178:11 338:19 340:9</p> <p>PowerPoint [4] 168:18 169:7,14,23</p> <p>PR [1] 280:3</p> <p>practice [4] 29:10 138:10 207:19 210:7</p> <p>preamble [1] 324:19</p> <p>precisely [1] 55:11</p> <p>prefer [1] 188:9</p> <p>Premier [29] 70:17 71:22 74:1 88:13 89:4,17 91:9 95:8,22 98:24 101:19 103:24 116:13 183:23,24 184:2 294:21 295:2,11 296:21,22 297:25 298:11 298:23 299:3,24 302:11 302:14 312:11</p> <p>Premier's [48] 31:4 70:4 70:18 71:10,10 72:13 73:25 74:10,24 75:3 76:15 78:8 80:11 85:12 85:21,23 86:10,15 87:13 87:22 97:13 99:3,5 100:5 101:6,18 102:1 103:5 104:5,11 110:1 184:7 185:25 215:21,24 254:14 254:21,25 265:23 276:15 277:1,8 314:3,9 329:14 329:16,19 330:2</p> <p>preparation [5] 95:11 170:15 202:24 221:14,24</p> <p>prepare [10] 79:19,24 82:24 167:15 202:22 243:8 276:8,11 326:8,11</p> <p>prepared [25] 8:5 22:11 53:10 66:19 67:3 69:3 80:7,12 83:1 154:5 156:25 159:6 186:5 214:13 215:17 243:8 276:3,12 283:1 325:19 325:20 332:23 337:5 355:15 365:10</p> <p>preparing [21] 16:9 59:5 78:7,8 79:18 117:3 135:5 163:4 168:9,18 169:5 170:24 171:4 172:25 174:1,10,25 247:19 282:25 325:24 329:24</p> <p>presence [3] 27:17</p>	<p>196:20 197:16</p> <p>present [6] 199:7 207:18 210:6 240:16 258:16 344:17</p> <p>presentation [17] 168:19 169:5,11,14 170:19,24 171:4,7,11,18 171:22 173:1,8 174:1,3 174:10 327:6</p> <p>presented [1] 222:10</p> <p>presenting [2] 172:22 178:24</p> <p>press [10] 195:8 212:13 216:8,15,19,24 217:10 217:20 218:1,10</p> <p>prevent [1] 209:13</p> <p>previous [7] 123:21 132:24 146:7 159:20 230:8 339:24 345:16</p> <p>previously [11] 63:15 93:14 99:19,23 162:7 233:6 287:2 321:24 328:25 330:5,9</p> <p>primarily [2] 78:25 103:21</p> <p>primary [2] 237:19 363:20</p> <p>print [1] 107:6</p> <p>printed [4] 26:4,16,20 37:19</p> <p>printer [1] 107:5</p> <p>priority [6] 76:15 103:16 206:25 261:14 279:22 324:13</p> <p>Pritchard [2] 369:18,19</p> <p>Pritchard/Stephen [1] 1:8</p> <p>Pritchett [1] 1:16</p> <p>privacy [2] 334:7 344:21</p> <p>proactive [2] 361:13 362:22</p> <p>problem [13] 39:1 42:23 45:21 64:24 65:1,3 68:6 192:20 209:18 218:14 219:10,12 350:19</p> <p>problems [1] 290:24</p> <p>proceedings [4] 25:6 91:17 92:25 132:19</p> <p>process [17] 25:7,10,14 38:19 42:20 77:1 85:3 91:19 93:1 100:12 124:12 132:21 199:1 249:8 278:4 336:9 340:3</p> <p>processes [1] 92:15</p> <p>produced [1] 164:3</p> <p>producer [1] 317:8</p> <p>profile [1] 363:13</p> <p>progesterone [3] 58:1 61:8 265:15</p> <p>program [2] 135:16 362:2</p> <p>progress [1] 6:16</p> <p>promise [1] 26:8</p> <p>promised [3] 26:6,7 116:15</p>	<p>prompt [1] 74:20</p> <p>prompting [1] 33:24</p> <p>proposed [1] 94:6</p> <p>protected [1] 173:18</p> <p>protection [4] 174:18 174:19 175:12 177:25</p> <p>protocols [1] 103:7</p> <p>provide [34] 17:7 35:4 45:2 61:18 106:2 127:11 152:5 154:16 156:24 159:12 180:25 189:23 194:9,11 203:11 211:10 211:15 256:4 262:11 336:2 338:15,21 341:4 341:25 342:2,12 345:7 349:12 350:7 355:16 358:24 359:17,19 365:23</p> <p>provided [51] 16:22 20:16 32:17 35:18 36:17 44:17 45:12 47:1 50:18 53:11,12,13 102:7 111:25 112:4 126:3 128:21 135:2 136:10 141:16 158:5 160:19 172:19 192:5 220:8 222:1,14 231:9 241:2 248:4 255:20 259:1 262:4 264:3,5 274:11 275:15 319:1 337:7 338:24 339:4,17,21,24 341:14 342:5,6,21 343:2 350:9 353:7</p> <p>provides [1] 106:6</p> <p>providing [8] 123:1 143:11 167:14 248:1 338:18 340:8 341:13 352:10</p> <p>province [6] 138:10 236:20 289:2 291:13 293:19 361:20</p> <p>provincial [6] 38:12 44:10 46:15 292:20 293:21,22</p> <p>public [80] 17:12 20:12 22:25 45:13 52:18 90:19 124:6 135:17,23 137:23 140:9,15 144:10,12 147:17 150:18 152:1,4,8 152:12,14 189:24 227:20 227:22,25 228:10,12,18 228:18 229:1,5,6 234:4 235:10,24 236:3 243:4 243:18 245:2,14,19,24 246:2,5,12,15,17,20 264:4 279:18 286:18 316:15 317:1 342:22 343:17 348:22 349:8 350:4,6,8,17 356:12,12 356:17,18 357:22 358:24 359:1,7,9,23 361:16 362:25 365:23 366:2 367:13,19,20,22,24</p> <p>published [3] 284:8,11 285:7</p> <p>pull [1] 169:11</p> <p>purpose [17] 78:25 85:2 144:11 152:2 159:11 186:14 189:22 202:2 204:18 255:16 256:2 275:25 286:14 326:13</p>	<p>358:4 361:12 362:3</p> <p>put [28] 10:19 21:2 59:25 60:21 77:5,10 80:18 81:10 94:6 101:5 135:22 136:19 171:6 173:5,9 174:9,12,14 185:25 198:19 243:17,24 263:5 267:17 292:5 324:4 326:11 331:10</p> <p>puts [1] 165:19</p> <p>putting [9] 52:17 95:20 117:4,14 139:17 142:20 162:8 169:18 364:13</p> <hr/> <p style="text-align: center;">-Q-</p> <p>Q&A's [1] 265:11</p> <p>Q.C [1025] 1:6,7 2:3 3:3 3:7 4:2,6,8,12 5:3,11,18 6:2,11,21 7:4,14,19,24 8:9,16 9:3,8,13,18,22 10:1,5,14,24 11:5,25 12:5,12 13:5,10,21 14:9 14:18,22 15:1,7,12 17:24 18:7 19:8,24 20:8,17 21:14,25 22:18 23:14 24:6,15 25:20 26:14,23 27:2,11,16,21 28:1,6,11 28:17,23 29:3,7,15,20 29:24 30:11,18,23 31:2 31:7,17 32:2,8,20 33:4 33:12,22 34:4,12,16 35:2 35:9,13,25 36:11,16,24 37:7,22 38:3,22 39:10 39:18 40:1,5,13,20 41:3 41:12,22 42:3,7,12 43:6 43:12,17,21 44:7,25 45:5 45:19,25 46:6,13 47:4,9 47:15,22 48:1,8,22 49:4 49:9,14 50:9,19,24 51:4 51:9,18 52:1 53:4,23 54:4,12,16,24 56:18 58:9 58:21 59:7,11,16,20 60:4 60:10,19 61:1,21 62:1 62:16,23 63:5,9,19 64:5 64:11 65:24 66:5,15,24 67:4,10,15,21 68:4,10 68:20 69:5,13,22 70:6 70:11,15 71:8,15,20,25 72:5,15,19,23 73:9,18 74:3,13,18 75:1,8,13 76:4 89:10,15,21 90:3 90:11,17 91:1,5,22 92:1 92:7,13,21 93:18 94:7 94:22 95:12,19 96:4,8 96:17,22 97:4,15 98:8 98:15,22 99:7,15,21 100:3,9,15,21,25 101:8 104:23 105:5,13 106:10 106:20 107:9,13,18,24 108:4,13,21 109:7,22 110:8,14,21 111:4,19 112:2,11,17 113:1,8,22 114:1,10,15,20,25 115:12 115:18,25 116:6 117:6 117:19 118:1,13,17 119:6 119:12,17 120:1,8,16,21 121:3 122:9,19,24 123:4 123:9,14,22 124:7,16,25 125:6,14,19,23 126:10 126:17 127:3,8,14,21 128:1,6,13 129:4,10,16</p>
--	---	---	--	---

<p>129:23 131:24 132:14 133:1,9 134:1,9,15 136:24 137:6,17,24 138:21 139:4,20,25 140:16,24 141:4,9,18,22 142:4,12,22 143:20 144:15,20 145:3,11,17 146:10,17,23 147:3,7,25 148:5,10 149:9,15 150:9 150:19,23 151:2,6,10,16 152:15,20,25 153:7,12 153:18,22 154:18,24 155:6,12,18,24 156:6,10 157:9,17 158:3,11,18,23 159:22 160:9,14,21 161:1 161:8,18,25 162:12,17 162:25 165:7,16 166:1,7 166:12,18,23 167:3,8,12 167:24 168:7,15,22 169:1 169:12,17,21 170:2,9,14 170:20 171:2,9,16,24 172:3,8,12,23 173:11,19 173:24 174:6,11,16,24 175:4,9,17,22 176:3,7 176:11,16,23 177:3,9,15 177:22 178:3,9,15 179:1 179:5,9,14,20,25 180:4 180:8,12 181:2,9,13,21 182:6,13,25 183:10,17 183:22 184:5,11,15 185:2 185:10,14,19,23 186:8 186:13,21 187:3,8,15,19 187:25 188:5,17,25 189:9 189:13,18 190:8,14,23 191:5,10 193:4,18 194:1 194:5,20 195:6,12,17,21 196:3,9 197:4,9,15,20 198:1,6,11,24 199:9,14 199:19,24 200:4,8,12,16 200:24 201:6,12,20 202:1 202:10,15,25 203:4,18 203:22 204:4,9,13,17 205:1,22 206:1,5,10,15 206:19 207:11,23 208:2 208:6,11,16,21 209:3,9 210:1,11,18,23 211:2,9 211:14,20 212:3,8 213:4 213:11,16,20 214:5,19 214:16,22 215:3,8,11 216:1,7,17,23 217:3,8 217:13,19,24 218:9,19 219:1,16,21 220:3,24 221:5,17,21 222:4,9,15 223:4,8,12,19 224:5,9 224:14,18,23 225:7,11 225:16,22 226:11,20 227:2,8,17 228:17,23 229:8,24 230:13,21,25 231:10,15,19 232:11,17 232:23 233:5,9 234:1,7 234:14,22 235:12,23 236:5,14,21 237:2 238:7 239:7,1,5,21 240:4,10 240:15,20 241:8,18 242:2 242:6,11 243:10,15 244:1 244:7,16,21 245:12,18 245:25 246:10,19,23 247:18,24 248:6,12,16 249:3,20,25 250:4,8,12 250:17 251:1,8,12,17,23 252:5,12,17 253:1,12,17 253:24 254:10 255:5,10 255:15,22 256:1,6,11</p>	<p>257:2,25 258:11,15,20 258:22 259:8,23 260:3,8 260:13,25 261:5,10,24 262:8,17,22 263:2,11,17 263:22 264:9,24 265:4 265:19,25 266:5,11,24 267:4,8,22 268:6,16,24 269:6,11 270:1,6,22 271:2,7,19 272:4,11 273:1,8,14,20 274:5,12 274:23 275:7,19 276:7 276:13,19,24 277:6,12 277:22 278:9,14,19,25 279:7,11,19 280:6,17,23 281:2,17,21 282:11,16 283:3,8,17,23 284:3,10 284:14 285:1,5,10,21 286:2,8,20,25 287:5,14 287:20,25 288:11,15,23 289:6,10,14,25 290:12 290:18 291:22 292:6,10 292:15,22 293:2,8,14,23 294:3,9,25 295:5,9,15 295:20,24 296:7,11 297:1 297:7,11,17,22 298:5,17 299:4,12,17,22 300:2,6 300:13,18,24 301:11,17 301:21 302:2,7,12,18 303:1,7,12,24 304:5,11 304:15,20 307:1,18 306:1 306:6,10,17,25 307:7,11 307:16,21 308:2,6,10,15 308:20,25 309:6,11,17 309:23 310:3,8,13 311:2 311:12,16,21 312:5,10 312:15,25 313:5,9,18 314:4,10,18 315:7,16,20 316:3,9,22 318:4,14 319:4,22 320:7,15,24 321:8,16,20 322:17,25 323:10,14,18,23 324:6 324:18 325:10,16 326:6 326:12,17,24 327:3,7,11 327:22 328:2,7,13,17 329:18 330:3,8,18,23 331:15,20 332:1 333:8 333:13,18 334:2,23 335:4 335:8,13,18,22 336:1,6 336:13,17,22 337:14,18 338:4,13 339:5,11,25 340:14,21 341:6,18 342:7 342:18 343:4,11,22 344:6 344:10 345:13,18,23 346:4,9,15,21,25 347:7 347:12,17,22 348:5,13 349:15,23 350:11,25 351:13,22 352:6,15,20 353:19 354:2,13 355:7 355:23 356:4,8,24 357:3 357:8,15,23 358:2,8 359:24 360:3,10,14,19 360:23 361:3,7 362:4,18 363:2 364:10,19 365:1,8 365:18 366:3,10,15,19 366:23 367:3,7,15,25 368:7,14 369:25</p> <p>Qs [1] 210:5 qualification [1] 315:22 qualifier [1] 318:23 quality [2] 52:17 92:15 questioned [3] 120:14 320:3 333:9</p>	<p>questioning [6] 269:13 269:21 318:6 351:5,6 354:14 questions [91] 28:2,24 38:25 42:22 44:12 57:16 57:19 65:3 79:6 87:5 90:5,14 93:21 94:2,6 96:13 98:12 106:8 109:21 113:17 115:19,20 116:21 118:22,24 119:2 132:10 134:18 135:8,11,14,19 135:23 137:18 141:23 142:3,16 146:20 171:18 171:25 172:9 188:14,16 189:2 206:25 207:3,5,10 207:12,16 208:5,25 209:1 209:6,10,20,21 210:5,9 210:10,12,16,17 211:6,8 211:12 212:2,22 215:18 216:12 218:6,11,25 248:21,25 249:5 250:14 250:19,21,23 252:18 253:19 257:5 268:14 275:25 276:6 333:15 354:22 368:16 369:2,6</p> <p>quick [5] 8:25 22:12 51:22 239:13,15 quickly [4] 49:25 196:19 198:16 237:14 quiet [1] 123:24 Quinn [16] 124:19 145:20 146:5 156:20 334:5 335:1 336:3,8 338:9,10 339:8 339:18 340:16 342:6 343:15 345:5 quite [8] 94:4 95:16 165:15 252:3 268:13 273:6 302:1 351:4 quote [2] 42:18 269:16 quotes [1] 18:9</p> <hr/> <p style="text-align: center;">-R-</p> <p>radar [1] 82:25 radiology [5] 244:8,12 349:22 350:23 351:11 raise [4] 47:17 133:3,6 161:20 raised [4] 133:7 297:4 297:25 322:22 raises [3] 38:25 42:22 44:12 raising [1] 322:2 ran [5] 277:25 278:5 280:14 281:9,11 ranked [1] 73:3 ranking [1] 76:12 rare [1] 206:2 rate [42] 21:20 24:20 55:25 56:3,7,14,16 90:20 90:23 91:11 94:23 95:14 95:20 126:1,19,25 127:1 127:2,13,18 128:3,15,17 128:23 129:3,20 130:9 130:10,16 131:5,11,14 131:16 139:16,19 160:5 160:8 161:22 163:18 193:15 209:11 233:15</p>	<p>rates [7] 50:6,17,17 121:14 122:8 130:6,25 rather [4] 209:2 284:18 290:4 350:2 rationale [2] 144:8 154:12 raw [5] 338:17,22 339:17 340:7,23 re [9] 158:25 159:5 165:10,19 168:3 239:8 336:24 338:8,9 re-sending [1] 158:4 reach [2] 297:24 298:1 reaction [1] 103:14 reactive [1] 151:24 read [46] 8:17,20,24 9:10 10:15,18 11:1,3,10 12:21 12:23 15:22 16:2,14 18:4 20:19 22:9 24:9,16 27:7 27:9,12,15,17 38:6 41:9 41:13 44:8,13,24 46:11 51:19,21 58:10,14 65:25 93:6 94:12,15 98:18 99:16 159:21 160:15 195:9 310:4,7 reading [9] 22:1,8 41:10 41:20 50:2 58:13 93:11 138:15 249:14 ready [16] 8:22 65:12,14 65:22 66:7,23 68:17 69:8 79:17 105:2 110:16 111:7 111:11 212:1 330:14,14 reaffirm [1] 319:9 reaffirming [1] 317:22 real [5] 50:8 64:7 175:14 230:5,7 realization [1] 220:7 realize [4] 175:10 186:22 363:7 364:11 realized [4] 22:1 62:7 64:19 189:25 realizing [1] 127:16 really [18] 40:24 56:2 76:11 82:12 126:22 163:23 164:15 178:7 182:17 196:18 201:24 241:24 244:5 250:7 268:13 338:16 340:7 353:15 reason [4] 24:3 46:21 300:10,11 reasons [4] 46:18 104:9 154:4 159:10 reassurance [1] 271:20 reassurances [1] 275:10 rebuilding [1] 363:21 recalled [3] 8:13 20:3 55:3 recalling [2] 17:9,12 receipt [1] 25:24 receive [21] 26:18 37:16 98:9,11 112:22 121:18 122:11,17 146:3 203:16 204:2 206:14 210:19 224:10 229:15 230:12 246:11 303:2,3 335:14</p>	<p>335:19 received [31] 13:24 14:16 18:1 26:11 53:5,8 57:25 74:24 113:23 121:12,23 122:7 128:25 160:13 204:24 253:18,22 257:15 272:7,9,21 277:3 305:3 307:1 311:9,18,24 317:17 329:5 334:21 354:17 receives [2] 121:19 123:15 receiving [14] 8:10,13 12:19 14:6 38:16 42:18 117:15 144:2 146:12 208:25 309:14 313:12 335:25 349:4 recently [3] 293:5 325:19 354:17 Receptor [3] 1:2 265:15 371:8 receptors [2] 61:8 64:19 RECESS [2] 120:25 288:20 rechecked [4] 259:7,21 259:24 320:22 recognition [1] 194:13 recognize [2] 236:19 261:15 recognized [1] 194:24 recollection [14] 35:14 36:25 100:16 206:6,11 278:20 280:12 294:19 302:3 303:8 323:15,24 330:19 347:14 recommendations [6] 307:6 306:3,19 310:14 310:16,19 recommended [5] 20:21 257:24 334:9 344:22 358:20 recommending [1] 257:21 reconfirmed [3] 322:7 322:23 323:2 records [1] 344:20 red [1] 149:17 refer [3] 45:15 227:24 323:19 reference [22] 18:8 20:22 50:5 132:8 143:10 160:4,8 163:18 164:22 164:23 180:24 193:14,16 233:17 234:19,20 260:17 261:6 267:17 288:3 297:12 317:20 referenced [11] 20:4 56:14 125:10 156:16 228:2 236:25 267:19,25 302:15 304:7 326:1 references [4] 162:6 232:7 310:15 325:18 referencing [3] 163:20 228:25 294:21 referred [9] 56:22 60:5 60:8 92:24 265:1 316:15 325:7 337:9 353:11 referring [10] 14:17 39:4</p>
--	---	---	---	---

55:12 62:11 92:17 153:11 321:23 324:12 325:2,4 refers [5] 20:20 50:11 132:4,16 264:10 refine [2] 196:20 198:17 refined [1] 198:22 reflected [1] 364:20 refrain [1] 150:17 refraining [1] 182:20 refuse [3] 44:10,20 46:15 refused [6] 38:13 43:1 50:20 75:15 190:20 202:7 refusing [4] 39:7 44:14 52:25 193:7 Reg [1] 328:21 regain [1] 152:14 regard [1] 122:18 regarding [29] 4:18,22 30:1 138:4 165:11,14,21 191:15 220:8 227:20 237:6 271:15 272:17 275:10 279:18 281:25 290:22 292:11 297:13 302:22 303:14 314:12 317:14 322:9 325:21 328:20 331:8 334:6 337:6 region [1] 293:18 Regional [2] 1:10,18 regions [1] 290:1 Registrar [5] 25:21 157:11 158:12 206:17 280:25 Reid [4] 316:25 318:5 321:2 322:22 reiterate [3] 319:15 339:23 359:8 reiterated [2] 13:3,6 reiterates [2] 52:13 338:23 related [5] 122:16 326:4 329:10 355:21 363:15 relates [1] 354:16 relating [2] 79:3 166:8 relation [4] 240:2 337:5 352:13 354:23 relations [1] 280:11 relationship [8] 212:25 349:2,10 351:2,3,8,16 351:19 relatively [1] 38:5 relatives' [1] 159:15 relay [1] 124:14 relayed [1] 37:4 release [42] 9:2,5,10,21 11:19 16:3 18:3,21 19:7 27:8 90:20 95:2 154:5 190:20 193:7 195:8 216:24 217:9 244:13 254:8 255:20 263:25 265:10,13,21 267:11 268:8 270:8 273:10 317:11,13,13 321:15 334:11,14,25 336:25,25 337:4,21 343:9 344:23 released [17] 17:17,20	57:5 61:15 124:5 144:23 209:11 249:12,16 321:24 332:20,22 334:8 336:3 338:17 340:8,24 releasing [1] 349:7 relevance [3] 22:21 58:24 78:5 relevant [15] 25:9,12 45:17 106:8 109:18,21 117:22 135:18 155:9 156:23 193:22,22 210:8 210:10 232:15 reliance [1] 144:24 reluctance [3] 33:14 41:6,9 rely [1] 256:18 relying [2] 135:1 350:3 remainder [1] 24:10 remaining [3] 80:13 81:1 321:25 remember [52] 5:10 29:2 30:17 35:23 51:12 56:8 58:8 62:5 94:19 98:3 109:12 111:17 130:24 139:11 145:24 146:1 147:11 177:18,21 191:4 192:13,21 193:1 201:4 204:3 207:6,9,9 207:12,15 218:20,24 244:5 256:21 258:8 267:18 270:11,20 277:11 289:18 301:8 303:20 304:25 309:10 310:21 312:6,22 335:21,25 336:5 343:20 353:25 remembered [3] 207:21 252:22 253:9 remembering [1] 192:24 remind [2] 70:1 117:17 reminded [1] 234:9 reminder [2] 116:12 118:2 reminding [1] 116:24 repeat [1] 364:18 repeatedly [1] 220:21 repetitive [4] 283:14,18 285:14,15 replied [2] 131:13 183:11 replies [2] 65:11 267:10 reply [4] 233:18 234:15 239:13 322:6 report [7] 52:7 156:18 214:18 215:11,20 222:22 334:8 reported [3] 143:13 190:19 215:23 reporter [6] 223:17,20 224:1 225:3,4,10 reporters [2] 143:10 156:16 reporting [2] 56:11 226:3 reports [16] 173:15 174:18,19 175:11,12,15 176:19,25 177:6,18,24	177:25 178:5,8,10 306:13 representatives [1] 353:6 request [41] 53:25 72:16 115:11 121:16,17,22 122:6 230:6 248:23 249:4 251:16 306:2,18 328:20 328:22 329:4 330:10,14 330:20 331:4,6,8,11 332:11,12,22 333:3,23 333:24 334:6,9,22 337:6 340:16 344:14,16,17 345:6,8 346:11 347:2 requested [16] 125:15 176:18,21,25 177:5 251:24 296:17 307:13 306:12 307:22 308:17,21 341:24,25 343:15 344:25 requester [2] 329:12 342:22 requesting [4] 121:13 252:22 312:24 341:3 requests [9] 325:22 329:7,10,20,24 331:19 332:11 335:12 346:18 require [3] 19:16 116:20 118:21 required [6] 33:24 52:11 116:16 257:16 272:22 317:18 requiring [2] 18:18 248:21 reread [1] 194:6 researching [1] 134:22 resignation [1] 337:6 resistance [2] 352:2,9 respect [17] 16:9 31:11 87:19 111:22 134:20 138:23 152:4 163:18 169:8 186:20 193:14 256:19 257:11 349:21 358:19 365:3 368:3 respond [10] 65:22 66:7 158:15 212:20 215:17 227:23 237:20,20 285:12 341:24 responded [1] 41:1 responding [2] 276:4,5 responds [3] 40:6 125:24 321:23 response [37] 48:9 94:5 105:1 128:7,10 130:4 143:23 144:3,16 145:4 146:24 147:1 152:21 160:22,24 182:3 196:21 211:22 241:16 248:21 249:5 253:18,23 267:16 281:5 283:1,2,5 287:21 294:23 317:4 322:5 327:24 331:6 334:4 338:8 340:15 responses [3] 90:22 211:7,7 responsibility [2] 93:19 117:9 responsible [2] 109:15 329:6	rest [2] 27:9 95:11 restore [1] 52:18 restoring [1] 237:17 result [10] 25:1,14 52:10 52:16 53:1 56:25 159:8 257:23 264:15 279:24 resulted [3] 38:14 39:7 43:1 resulting [1] 264:16 results [31] 18:13 19:1 19:10,18 20:19 21:19 38:15 39:9 52:20 57:3 57:21 90:20 94:25 133:25 156:21 193:21 209:15 210:13 257:19 279:23 280:9 289:24 290:9,10 315:1,12 317:4 332:8 338:9 344:17 353:2 resumed [1] 289:21 resumes [2] 2:2 52:19 retest [3] 159:10,11,13 retested [11] 56:25 159:15 249:7,10 252:19 252:20,21 257:18 279:21 314:24 315:11 retesting [3] 52:15 105:18 289:23 return [1] 370:3 reveal [1] 156:17 revealed [3] 50:12 56:5 57:24 reveals [1] 50:15 review [34] 18:10,15 92:15 136:17,18 173:15 185:25 197:2 199:4 227:25 237:5,12,19 239:6 239:8 250:23 254:4 257:14 260:16 266:22 272:20 274:7 275:18,23 276:18 277:3 296:15 314:3,9 317:16 331:5 342:20 344:3 353:14 reviewed [10] 10:22 11:19 170:18 186:6 200:5 264:13 266:20 314:2,7 338:14 reviewing [9] 34:5 171:7 200:21 202:2 214:6,17 215:9 247:25 252:6 reviews [1] 173:18 revisions [1] 201:13 RHO [1] 325:21 right [28] 1:8 9:17 43:16 45:4 62:15 77:20 78:20 81:18 82:15 85:2,10 92:12 99:14 100:20 132:7 154:4 162:18 165:6 205:21 219:4 251:20 288:19 304:2 333:7 355:1 362:19 369:10,18 road [1] 142:14 Robbins [1] 227:21 Robert [5] 237:10 265:9 337:3,15 338:14 role [9] 31:10 118:25 119:2 134:21,23 135:21	136:2 277:21 347:4 roles [1] 117:3 Rolf [1] 1:8 room [9] 33:15 178:23 179:2,10,16 187:12 296:20 327:13 368:19 round [1] 61:6 rounds [1] 368:19 route [4] 86:21,22 87:10 88:2 routed [1] 87:15 routine [1] 106:13 running [2] 85:5 219:12 <hr/> -S- <hr/> sake [1] 73:13 samples [10] 18:14 52:9 56:23 58:19 61:5 159:15 290:3 294:6 314:24 315:10 Sandra [4] 1:7 2:3 4:6 265:6 sarcasm [1] 14:12 sat [4] 108:6 109:8 179:6 214:12 satisfactory [2] 147:1 200:13 satisfied [4] 14:5 202:5 210:6 218:5 Saturday [2] 239:12 281:12 saw [12] 27:24 31:15 43:18 53:22 112:21 158:19 162:4 163:12 225:3,10 325:5 363:4 says [35] 38:11 40:7 44:9 45:7 48:12,18 52:17,19 57:4,14,23 61:2 65:6 71:1 121:14 157:21 160:1 165:9 180:19 233:17 234:20 237:10 242:21 245:5 267:10 272:18 279:20 281:7 307:4 314:23 324:19,25 325:3 337:20 363:14 scan [1] 51:22 scanning [2] 49:25,25 sceptical [1] 155:16 scepticism [1] 155:5 scheduled [1] 107:16 scheduling [1] 369:23 Sciences [1] 58:3 screen [2] 53:10 195:22 screening [2] 226:4 227:4 scrutinizing [1] 226:23 seated [4] 3:2 121:2 219:8 288:22 second [10] 18:9 38:11 39:6 42:25 50:4,16 58:18 138:6 249:9,9 secretary [1] 327:14 Secretariat [4] 31:4,11 87:12 330:1
---	---	---	---	--

<p>secretary [7] 60:2,16 105:11 306:21 307:25 308:1,3</p> <p>section [8] 328:24 330:4 356:13,14,18 359:2,4,12</p> <p>secure [1] 229:7</p> <p>see [56] 17:7 18:8 20:22 21:6,21 26:6 27:22 40:21 58:18 67:13,23 78:16 81:11 86:20 88:24 89:3 91:16 92:10 93:15 103:23 108:14 111:5 113:2 117:20,23 132:3 157:24 171:11,12 188:23 192:20 208:1 225:8 231:7 233:10 272:17,18 284:19 287:11 299:10 309:19 313:21 331:5 333:7 334:4 338:17 339:6 340:6,7,23 345:2 355:24 362:5,6 365:12 368:19</p> <p>seeing [3] 58:8 309:22 342:15</p> <p>seek [3] 115:20 134:23 345:5</p> <p>seeking [1] 103:14</p> <p>seem [7] 6:16 79:3 193:1 197:21 303:22 309:7 347:1</p> <p>send [31] 14:7 30:14,24 31:3,10 74:8 75:2 86:11 89:11 99:10 100:6 101:18 203:23 204:25 206:22 207:5 208:22 209:1 230:1 239:15 250:1,13 286:11 286:13 287:16 294:5 317:7,21 321:3 327:15 327:18</p> <p>sending [38] 26:21 30:12 31:12 37:23 48:23 71:13 71:21 72:7,13 98:17,20 98:21 100:5 101:25 106:18 158:24 159:1 203:14 207:6,9,12,15 232:8,12 264:6 272:14 274:1 277:4 283:12,13 283:24 284:18 286:15 290:2 313:21 320:25 325:1 334:15</p> <p>sends [2] 158:13 287:15</p> <p>senior [7] 23:25 24:4 30:19 106:5 124:8,9 160:2</p> <p>sense [7] 155:7,9 163:4 182:7,12,14 183:3</p> <p>sensitivity [1] 341:12</p> <p>sent [65] 18:14 22:10 30:8 30:16 36:5 56:23 75:21 85:11 88:16 89:17,20 99:23 100:14 103:25 111:1 112:9 149:1 156:13 157:5,21 158:9 159:19 162:13,19,22 166:4 203:8 204:3,5,23 205:23 206:25 208:12 239:20 245:5,10 247:1 250:24 251:25 252:3,8 266:21 267:5 274:6,7 275:16 276:25 281:9,13 283:16 286:10</p>	<p>287:10,10,13 298:16 306:7 314:2,8 322:8 328:10,22 340:11,17 343:10 345:17</p> <p>sentence [1] 48:15</p> <p>sentences [1] 245:13</p> <p>sentiment [3] 41:4 153:9 343:24</p> <p>separate [5] 188:8 227:25 229:1 235:7 283:22</p> <p>separately [3] 187:22 188:6 332:23</p> <p>September [1] 347:25</p> <p>serious [3] 3:9 15:2,6</p> <p>serve [2] 338:21 341:4</p> <p>service [1] 307:6</p> <p>session [14] 59:6 81:15 81:23 82:4 83:25 99:20 185:9 199:6 207:19 210:7 210:10 218:25 296:19 303:21</p> <p>sessions [2] 105:23 108:11</p> <p>set [6] 33:20 84:7 103:7 188:24 213:14 222:24</p> <p>setting [1] 268:8</p> <p>seven [2] 84:17 264:12</p> <p>seventeen [2] 264:14,15</p> <p>several [4] 12:16 65:4 170:25 320:3</p> <p>severed [5] 328:25 330:5 330:9,10 334:11</p> <p>shaken [1] 154:20</p> <p>shall [4] 40:14 81:1 84:13 87:15</p> <p>share [10] 153:1,1,4,9 155:1 237:21 239:1,14 348:14 350:23</p> <p>shared [2] 154:25 190:10</p> <p>sharing [1] 238:3</p> <p>shed [1] 328:3</p> <p>sheet [8] 17:19 18:23 19:5 21:10 55:15,22 56:4 94:21</p> <p>shifted [1] 73:19</p> <p>short [1] 38:5</p> <p>shortage [2] 134:7 137:2</p> <p>shortly [6] 70:21 71:4 157:19 219:12 237:20 348:1</p> <p>shoulder [1] 199:2</p> <p>show [6] 102:22 245:2 245:14,19 324:14 363:4</p> <p>showing [2] 243:4,19</p> <p>shows [1] 161:4</p> <p>sic [1] 193:15</p> <p>sick [4] 139:9 146:2,4 155:21</p> <p>signed [3] 80:13 170:19 229:19</p> <p>significance [3] 72:6 233:20 234:24</p> <p>significant [12] 31:18</p>	<p>31:23 38:21 45:10 47:11 72:11 74:19 160:3 161:3 164:20 200:23 347:2</p> <p>significantly [1] 284:21</p> <p>silence [1] 353:1</p> <p>silent [1] 34:7</p> <p>similar [2] 21:9 349:19</p> <p>Simmons [3] 1:10 368:21,22</p> <p>simply [2] 134:25 147:2</p> <p>Sinai [3] 18:14 56:24 290:3</p> <p>sit [2] 179:2 199:5</p> <p>site [1] 223:17</p> <p>sitting [1] 179:16</p> <p>situation [3] 151:25 190:1 347:1</p> <p>six [6] 73:4,6,7,13,14 253:5</p> <p>sixty-three [1] 264:13</p> <p>skim [2] 27:22,24</p> <p>skip [1] 113:10</p> <p>slide [1] 292:5</p> <p>small [2] 219:9 247:3</p> <p>Society [2] 1:15 57:18</p> <p>sole [1] 267:15</p> <p>solicited [1] 266:1</p> <p>someone [13] 14:23 41:15 69:6 94:9 103:14 198:19 214:8 222:24 251:4 255:6 269:19 271:24 298:24</p> <p>sometime [6] 175:1,7 187:16 200:25 201:7,9</p> <p>sometimes [2] 106:16 367:16</p> <p>somewhat [3] 162:4 198:22 249:16</p> <p>somewhere [2] 102:20 223:25</p> <p>soon [2] 311:18 313:1</p> <p>sorry [37] 14:25 17:23 17:25 19:11 32:21,25 36:3 48:15 63:12 73:10 89:9 121:7 157:10 183:12 203:5 207:7 215:4,7 222:18 242:22 253:13 272:13 278:2 286:3,4 291:9 292:4 295:16 297:23 308:7 314:5 321:15 352:24 360:13,15 364:18 370:9</p> <p>sort [7] 86:21,23,23 310:24 338:21 349:14 362:2</p> <p>sorts [1] 112:23</p> <p>sound [1] 371:14</p> <p>source [3] 256:15,18 258:23</p> <p>speak [12] 44:14 54:7 69:8 184:12 187:4,9 204:20 205:13 257:4 300:3 353:6 361:23</p> <p>speaker [2] 271:9,12</p>	<p>speaking [8] 174:4 257:10 258:5 265:11 270:15 271:18 341:22 353:15</p> <p>special [1] 230:9</p> <p>specialist [4] 70:4 87:22 138:5 277:20</p> <p>specific [13] 5:10 17:9 72:10 122:16 152:23 195:3 211:8 323:7 324:3 355:10 363:22 364:25 365:5</p> <p>specifically [30] 14:14 17:18 23:17 33:8 35:23 48:5 98:3 108:9 109:12 128:9 165:25 174:22 201:4,10 241:4 252:2 262:5 270:11 276:10 277:11 278:12 283:11 286:1 291:20 315:8 318:9 323:1 351:11 353:25 357:14</p> <p>specifics [2] 111:17 304:10</p> <p>speculation [2] 165:2,4</p> <p>speed [1] 112:19</p> <p>spell [2] 75:15 195:2</p> <p>spelled [1] 50:25</p> <p>spend [1] 3:21</p> <p>spoke [10] 36:18 67:17 130:25 131:2 223:3 224:19 299:18,18 308:11 351:23</p> <p>spoken [5] 69:16 225:12 288:4,7 316:4</p> <p>spokesperson [1] 276:5</p> <p>spot [2] 212:7 286:7</p> <p>spots [2] 84:13,17</p> <p>spreadsheet [3] 263:13 307:5,7</p> <p>spring [16] 10:21 24:11 51:15 53:12 58:7 60:9 60:12,22 137:3 176:4 177:12 192:9 194:6 219:24,25 220:16</p> <p>St [11] 105:8,9 106:14,22 290:5,7 291:24 292:1 294:6 371:11,16</p> <p>stab [1] 94:1</p> <p>Stacey [1] 1:17</p> <p>staff [11] 71:10 93:25 116:25 133:24 134:25 135:3,14,18 142:9 160:2 217:12</p> <p>stage [2] 71:21 198:23</p> <p>stain [2] 291:5,11</p> <p>staining [4] 291:23 292:1 292:4 297:13</p> <p>stake [1] 327:14</p> <p>stakeholders [1] 359:5</p> <p>STAND [1] 2:2</p> <p>standard [6] 116:19 262:11 293:17,18,21,22</p> <p>standards [1] 292:20</p> <p>standing [1] 370:11</p>	<p>stands [5] 35:19 56:7 66:8 172:24 178:17</p> <p>start [3] 78:20 79:11 369:24</p> <p>started [4] 3:8 107:23 186:19 249:8</p> <p>starting [1] 337:1</p> <p>starts [1] 37:9</p> <p>state [1] 195:4</p> <p>statement [11] 17:10,19 34:8 39:14 159:6 249:11 263:24 288:5 317:7,21 353:11</p> <p>statements [2] 136:7 314:12</p> <p>states [5] 52:7 57:11 198:15 249:11,13</p> <p>stating [2] 17:6 61:14</p> <p>statistics [1] 249:12</p> <p>stats [1] 247:2</p> <p>status [7] 101:1,9 117:23 118:7 119:21 280:3 310:18</p> <p>Stephanie [1] 352:25</p> <p>Stewart [1] 159:5</p> <p>still [24] 3:23 6:14 23:19 43:4,13,22 44:5 57:12 66:12 67:14 73:7,10 183:6 196:14 218:17 224:11,15 231:11 236:19 296:19 319:19 349:16 351:14 368:1</p> <p>Stokes [3] 56:22 57:16 57:23</p> <p>Stokes-Sullivan [1] 61:3</p> <p>stopped [1] 170:25</p> <p>stories [6] 61:13 227:11 352:23 362:10 364:5,6</p> <p>story [26] 37:14 55:7 56:9 57:17 76:3 102:20 139:2 139:6,9 141:25 145:19 145:21,24 146:4,9 147:21 147:22 150:14 223:18,20 225:17 226:14 233:10 327:20 352:22 364:4</p> <p>straight [1] 222:25</p> <p>strategic [2] 359:13 363:17</p> <p>strategy [11] 345:7 346:11 349:19 355:4,9 355:16 356:20 361:12 362:13 364:14,23</p> <p>strengthened [2] 349:1 349:9</p> <p>strengthening [2] 351:1 351:16</p> <p>stress [2] 138:6 349:6</p> <p>strong [3] 153:8 269:4 363:17</p> <p>struggling [1] 135:18</p> <p>stuck [1] 157:1</p> <p>style [2] 115:8,9</p> <p>subject [21] 89:24 110:3 110:9 116:11 121:10</p>
--	---	---	---	--

<p>166:13 173:25 180:17 206:24 222:20 226:2 229:11 232:5 242:14 247:2 248:20 254:3 265:10 324:11 327:13 333:22</p> <p>subjects [1] 171:12 submission [3] 121:12 124:3 358:15 submit [1] 284:20 submitted [3] 285:6 344:16,18 subset [1] 318:24 substance [2] 25:15,16 successful [1] 363:18 successfully [1] 360:24 such [2] 173:9 194:23 sudden [1] 82:5 sufficient [2] 103:4 194:22 suggest [8] 24:17 51:1 52:22 63:18 201:18 361:25 368:19 369:22 suggested [4] 90:22 200:22 242:1 272:16 suggesting [13] 96:23 239:9,11 268:10 316:14 317:8 319:18 320:16,17 320:20 342:8,11 343:8 suit [2] 5:9 209:14 summary [3] 112:25 355:16 356:20 summer [15] 220:15,16 348:1 351:15 355:4,17 355:22 356:19,22 358:1 361:12,17 362:3,8,8 supervisor [2] 6:25 268:22 support [5] 257:15 263:24 265:1 272:22 317:18 supposed [4] 171:17 341:2 358:4,5 surgeons [1] 18:20 Surgical [1] 296:14 surprise [1] 40:21 surprised [7] 15:11 39:13 49:17,21 56:10 139:12 141:1 survive [1] 57:22 survived [1] 57:22 Susan [23] 121:10,15,19 161:5 196:5,11 207:1 212:19 222:24 226:3 229:11 242:17 243:11 247:3 296:17 297:24,24 298:1,7 299:10 322:7 337:2 345:4 synopsis [2] 112:22,23 system [7] 64:25 65:21 68:3,19 92:15 237:18 363:22</p> <hr/> <p style="text-align: center;">-T-</p> <hr/> <p>table [13] 2:1 73:5,14,16</p>	<p>80:17,18,23,25 81:8,10 83:18,19 84:12 tabs [1] 83:19 takes [2] 7:6 107:2 taking [7] 62:18 64:7 77:24 213:6 216:20 238:3 353:20 talks [2] 50:16 58:19 Tansy [11] 2:2 4:6 118:4 181:24 196:14 222:21 226:5 229:19 278:3 282:2 331:6 Tara [1] 70:7 target [2] 359:4 366:12 task [1] 169:5 Taylor [3] 1:12 328:23 369:11 team [1] 13:20 technical [15] 7:6,16 31:19 54:19 63:1,16 93:4 102:3 142:1,7 169:13 188:11 212:13 216:16 353:7 technology [2] 209:16 210:14 Telegram [6] 50:4,11 52:23 58:5,10 281:9 telephone [1] 289:15 television [1] 112:8 telling [11] 143:13 145:5 145:7 158:19 192:11 193:1 281:13 304:21 350:16,18 365:11 tells [2] 247:7 269:1 template [2] 116:19 361:11 ten [8] 76:12 77:11,19 79:7,8 84:21 369:8,12 ten-year [1] 159:7 tended [1] 115:10 term [1] 92:20 terminology [1] 161:21 terms [62] 5:8 7:15 19:9 21:21 22:20 30:12 33:15 33:16 52:20 61:13 65:19 76:13,15 82:12 91:4,6 97:16 100:13 102:13 103:13,16,22 119:18 122:20 133:11 135:8,21 144:5 149:19 164:23 172:25 188:23 199:25 202:23 216:24 222:2,5 240:24 241:20 244:11 247:19 258:23 260:17 261:6 280:10 283:15 310:14 315:3 319:5 330:14 339:19 342:5 351:8,11,12 352:18 363:25,25 364:13,21,22 369:23 test [26] 18:13,14 19:10 25:1 38:15 39:8 52:19 57:21 94:25 133:24 156:21 209:15 210:13 233:15 257:14,23 272:20 280:9 289:24 291:11,14 315:1,12 317:3,16 344:17</p>	<p>tested [4] 64:18 257:20 291:6 324:23 testimony [1] 326:3 testing [14] 1:2,13 61:6 132:17 138:7 262:11 265:15 289:19,21 297:13 324:21 341:12 363:16 371:8 tests [10] 4:20 18:11 19:11 57:13,20 58:2 64:17 249:7 252:19 290:24 thank [30] 3:18,25 4:1,5 17:25 48:21 62:15 104:22 104:24 105:6 120:22 121:4 136:21 157:11 165:6 193:3 205:21 206:20 212:9 219:5,17 229:16 255:4 266:18 286:9 288:24 333:7 368:8 368:16 370:9 thanks [9] 118:3 196:13 226:5 229:19 239:12 247:8 285:12 329:1 331:6 there'd [3] 358:23 359:4 359:5 thereabouts [1] 126:4 thereafter [1] 237:20 they've [2] 161:16 320:10 thinking [9] 42:24 46:4 46:11 96:9 136:25 163:16 163:24 180:17 246:2 thirty-nine [1] 264:11 Thompson [18] 220:17 237:8 239:9 265:9 267:10 275:22 316:11,17,18 324:10 327:17 331:2,3 337:15 338:1,6 340:6 344:5 Thompson's [1] 321:22 thought [18] 19:13 42:21 59:8 74:1 85:18 104:4 130:8,8 160:12 214:25 216:11 218:2,4,4 222:23 236:7 301:7 332:11 thoughts [1] 259:14 three [19] 20:4 73:17 83:14 95:1 98:6 99:10 113:13 123:23,24 166:4 195:20 257:17 264:14 272:23 289:22 317:19 321:13 329:13 365:22 through [43] 6:16 10:10 10:12 11:1,3 18:4 23:3 27:9,22,24 38:4,6,18 42:20 43:9 62:18 74:4 87:11,12 88:1,7 94:16 109:18 114:3,6 149:6 166:2 169:25 181:15 207:17,19 211:6 212:1 214:12 230:10 270:13 329:25 330:16 332:22 347:25 351:4,5 361:17 throughout [10] 45:13 112:24 151:22 171:1 229:15 230:5,12 326:2 354:8 358:1</p>	<p>Thursday [1] 281:10 tight [3] 169:10 173:6,9 Tilley [29] 5:14 13:9 14:10 159:2 178:21 181:20 199:6 210:8 212:2 214:13 215:17 226:1 232:2 242:1 248:18 257:8 268:3 270:19 271:10,23 272:2,7 281:23 282:1 285:12 307:5,10 311:6 327:16 Tilley's [4] 257:10 258:5 267:13 270:15 timeline [1] 139:2 timely [3] 213:3 349:4,8 times [3] 66:11 107:4 218:17 tissue [5] 257:17,19 292:5,7,12 title [1] 277:19 today [15] 3:11 25:4 51:13 57:15 70:19 116:14 118:3 121:16 196:12 229:14,18 242:20 252:7 316:24 322:7 together [18] 8:21 10:21 59:25 60:21 80:19 117:4 117:14 139:18 169:11,18 171:7 173:5,9 186:1 198:19 326:11 331:10 364:14 Tom [2] 221:1,2 tomorrow [6] 121:20 183:13 242:15 249:6 284:18 328:24 tomorrow's [3] 239:9 242:18 247:7 tonight [1] 284:18 too [5] 32:3 41:13 72:2 111:6 237:14 took [8] 72:20 89:12 126:5 156:7 210:5 221:13 258:17 350:5 tool [1] 366:11 top [58] 72:24 73:7 76:12 77:11,19,20 78:5,9,11 78:15,18 79:7 80:10,17 80:20,23,24 81:7,8,10 82:7,7 83:17,24 84:2,6,7 84:19 85:10,21,24 86:3 87:2,24,24 89:1 98:24 99:4,5,19,22,24 100:13 100:18 101:5 102:6,10 103:20,23 104:1,20 116:13 118:2,9 119:20 119:23 120:7,10 topic [2] 229:13 230:2 torn [1] 348:19 Toronto [2] 18:15 223:25 total [9] 19:9,10,11,12 19:14,16,17 53:1 264:10 totally [1] 222:22 touch [2] 212:10 215:25 tour [1] 353:8 towards [1] 351:20</p>	<p>track [4] 58:23,25 59:12 61:12 tracking [3] 49:15 59:2 64:2 transcribed [1] 371:13 transcript [1] 371:7 transcripts [5] 112:7 229:11,13,15 230:2 transmission [3] 252:8 296:1,2 treating [1] 280:1 treatment [16] 18:16,18 19:16 20:21 24:22,24 37:16 38:17 42:18 52:11 57:25 156:18 257:21,23 264:16 279:24 treatments [1] 57:2 tried [2] 128:21 298:1 Trish [1] 307:7 true [4] 346:20,24 347:11 371:7 truly [1] 191:22 trust [15] 23:20,23 149:24 154:20 155:2 184:23 189:3,4,7 190:5 190:25,25 197:7 256:13 259:16 trusted [3] 23:6 150:4 264:4 trusting [1] 11:17 try [8] 79:11 152:13 281:4 284:15 342:2 361:14 362:16 369:20 trying [29] 13:12,16 14:3 73:1 103:11 145:25 198:16,18 234:24 241:14 241:25 244:10 277:24 283:24 285:16 297:24 301:23 303:17 331:21,22 332:3 339:3 341:15 342:17 343:12 354:10 364:1 365:6 366:5 Tuesday [2] 145:25 229:16 tuned [1] 95:15 turn [5] 25:10 229:4 243:9 245:23,24 turned [1] 243:19 turning [1] 228:22 Turpin [2] 222:20 333:21 TV [1] 57:8 tweak [1] 285:13 two [22] 9:1 22:4,12,16 36:2 73:17 82:4 83:14 86:16 87:6,7 112:24 158:13,24 235:7 261:6 282:8 321:13 322:6 326:22 365:22 368:9 type [8] 21:10 178:23 237:5,12 239:6,8 260:16 329:7 typed [1] 245:13 types [2] 135:22 329:20 typically [5] 230:6 329:5 329:7 341:22,23</p>
---	--	---	--	---

<p>typing [1] 245:8 typo [8] 126:25 130:11 131:16 247:3,14,15 248:13,15 typographical [1] 127:17</p> <hr/> <p style="text-align: center;">-U-</p> <p>Uh-hm [16] 80:5,15 82:9 83:10 84:15 87:17 88:4 191:18 198:7 257:3 261:1 262:16 264:23 273:13 281:16 296:10 ultimately [5] 128:15 144:12 171:21,22 342:22 Um-hm [10] 5:17 8:8 9:12 12:11 15:24 18:6 38:2 103:1 312:9,14 unable [1] 317:5 unanswered [1] 57:19 unaware [1] 293:4 under [13] 20:19 83:14 121:12 122:7 124:3 132:15 173:18 174:20 176:1 200:22 215:14 286:17 334:6 understand [27] 16:1 24:8 61:9 62:20 78:21 130:3,5 145:6 150:11 171:17 178:10 181:3,25 219:9 221:23 236:4 239:22 270:7,8 291:23 291:25 292:16 306:5 314:20 343:12 344:14 346:16 understands [1] 61:10 understood [15] 13:13 16:10 23:8 46:24 76:10 77:25 78:24 82:11 122:25 130:2 131:7 145:9 161:19 274:16,17 undertake [1] 265:13 undertaken [3] 16:23 237:13 291:11 undertaking [1] 261:17 undertook [1] 290:10 undoubtedly [1] 363:12 unintelligible [2] 369:16 369:20 unless [6] 29:12 113:11 138:18 230:6 303:23 342:25 unusual [3] 203:14 331:14 347:8 up [98] 5:12 7:5,7 24:21 26:21 44:4 48:3 51:15 53:25 54:8 67:23 73:16 73:19 78:2 87:4,5 88:15 91:13 95:13 100:22 102:13 107:25 112:19 119:11 123:19 126:1 127:6,9 128:10 130:14 131:17,21 135:15 143:8 143:15,16 145:10 146:3 146:8 148:12,15,17 149:2 149:8,20 153:25 154:5 156:19 160:15 161:2</p>	<p>162:10 173:25 177:11 182:21 183:1 194:18 197:22,24 205:13 207:4 209:5 213:15 219:11 231:24 235:19 240:11,17 242:18 243:1,4,19 245:2 245:14,19 249:22 250:18 250:21 268:8 272:13 287:6,9 289:20 291:16 292:11,24 293:5 294:22 300:11,14 303:18,23 322:10 323:4 333:2 335:7 338:3 351:14,25 up-to-date [2] 152:5 350:8 update [7] 33:19 34:22 35:4 121:9,10 253:11 344:15 updated [19] 37:17 71:1 74:2,25 99:24 104:2 105:17,17 106:2,7 107:7 108:1,6,22 109:1,17 203:9 307:8 310:10 updating [2] 90:6 350:13 used [7] 21:20 167:20,21 167:22 169:8 188:15 320:23 useful [1] 368:11 using [6] 154:11 256:15 259:22 264:3 295:2 323:21 usual [3] 203:11 244:22 331:9 usually [2] 41:14 329:23</p> <hr/> <p style="text-align: center;">-V-</p> <p>valid [4] 42:14,21 43:18 48:2 various [3] 163:6 281:10 281:14 venue [2] 228:16 229:7 verbal [2] 128:11 211:7 verbally [5] 19:22 20:7 20:9 98:4 195:16 verbatim [1] 93:2 verification [2] 264:7 272:7 verified [2] 258:7 272:2 verify [1] 279:17 verses [1] 291:12 version [3] 99:24 272:16 273:17 versions [2] 75:23 330:13 versus [1] 227:4 very-level [1] 11:20 vetted [1] 329:25 view [21] 12:14,15 13:15 13:17 55:22 81:11 153:1 169:14 190:9,11 231:16 238:3 239:2 241:12 264:7 268:18 320:9 338:20 341:3 349:25 350:2 viewpoints [1] 199:8 views [3] 152:16 237:21</p>	<p>239:15 VOCM [1] 226:3 voice [1] 269:5 voiced [2] 290:19,22 voicing [1] 293:16 Vokey [1] 232:4 VP [1] 289:7</p> <hr/> <p style="text-align: center;">-W-</p> <p>wait [3] 86:1 180:1 317:5 walk [2] 36:7 179:10 walked [1] 179:17 wanting [1] 275:1 warning [2] 145:18,20 warrant [1] 103:4 warranted [1] 72:7 watch [1] 112:13 watched [1] 53:17 website [1] 37:19 Wednesdays [1] 304:14 week [10] 72:1 82:4 121:18 146:6,7 229:15 324:22 337:3 350:13,13 weekday [2] 230:8,9 weekend [3] 230:5,7,12 weekly [1] 350:7 Wegrynowski [1] 307:8 Wegrynowski's [1] 306:13 welcome [2] 196:16,19 welcomed [2] 7:21 197:17 Western [1] 1:17 whatsoever [2] 258:25 342:9 whereas [1] 115:10 White [1] 286:10 whole [3] 220:12 312:23 312:23 wireless [1] 219:10 wisdom [1] 82:6 Wiseman [21] 118:5 121:8 125:24 126:7,12 127:16 128:20 129:6 138:3 176:2 231:22 232:4 233:16,23 241:3,5 253:3 253:14 316:17 327:17 331:2 Wiseman's [2] 126:18 221:4 wish [1] 33:2 withheld [4] 46:5,9 147:17 152:7 withhold [4] 140:8 209:12 261:13,21 withholding [2] 153:14 232:6 within [74] 8:14 26:2,9 29:13 30:9,13,19 41:24 60:16,22 61:19 73:8 75:12 76:9,18,22 77:10 77:15,19 78:23 80:8,21</p>	<p>93:13 97:18 98:1 102:20 105:11 114:11,12 116:3 124:9 125:24 128:18 132:18 133:8 137:10,19 137:20 138:12 140:1,18 142:9 152:14,17 159:3 160:17 162:23 166:3,14 167:19 170:7 177:16 181:23 191:16 213:10 232:15 241:21 254:15 255:1 266:6,25 271:14 271:24 272:6 277:4,7 293:17 298:24 299:13 309:13 325:15 334:12 344:24 364:22 without [11] 69:6 182:7 190:6 284:7 307:1 323:19 336:8 342:8,14 354:3 365:25 witness [1] 369:23 women [3] 56:25 156:17 156:21 wondered [3] 140:7 163:19 164:21 wondering [9] 17:8 40:14 54:7 97:5 127:18 129:5 353:20 363:9 365:13 word [3] 3:20 189:10 193:9 wording [1] 46:14 words [9] 14:15 86:8 143:14 153:8 191:20 194:2 322:3 324:3 358:16 worked [2] 168:23 219:11 write [13] 26:6 37:23,24 116:20 118:22 119:2 180:16 196:11 248:22 302:19 316:23 328:21 337:2 writes [4] 56:22 138:5 156:14 282:1 writing [7] 134:21,21 135:11 203:15 211:13 253:22 331:1 written [8] 40:21 134:13 134:24 138:3 211:7 322:15 352:23 357:22 wrong [24] 21:19 39:16 43:5 44:19 54:8 57:14 57:20,25 65:4 66:2,8 69:16 82:17 111:9,14 117:16 178:12 209:14,17 210:13 211:17 218:14 222:22 290:24 wrongly [1] 324:23 wrote [1] 327:24</p> <hr/> <p style="text-align: center;">-X-</p> <p>X [1] 83:14</p> <hr/> <p style="text-align: center;">-Y-</p> <p>Y [1] 83:15 Yates [1] 212:10 year [10] 34:6 45:16</p>	<p>90:19 154:9 177:11 180:25 288:5 353:5,12 354:8 years [3] 3:10 64:20 65:4 yesterday [19] 4:14 5:12 5:22 10:20 13:14 33:13 59:24 60:9 63:15 64:6 76:11 77:1,25 78:22 82:11 112:21 183:2 219:22 351:24 yet [2] 227:22 270:21 yourself [45] 5:15 8:2 8:17 14:23 26:24 34:18 36:13 37:10 63:21 72:20 88:19 97:1 112:19 116:2 121:6,7 129:6 149:19 180:14 194:23 203:6 206:22 216:18 217:14 221:1 222:16,19 225:25 227:21 231:22 232:1 239:8 246:25 248:18 265:6 275:21 278:2 281:24 286:12 294:12 296:1 310:4 324:8 333:22 343:23</p>
--	---	--	---	---