Q. Are you aware that you are suing -- are you aware that you've brought counterclaims contending that -- strike that.

Do you have any understanding of the claims that you've brought in this case against one, two, three, four, five, six, seven, eight different people and entities?

A. Well, you don't have to throw your pen. We can talk about that.

Q. If I threw my pen, it would be through the

window. It's sitting on my legal pad.

A. Try not to hit me though because that would be bad.

Q. I have excellent aim. Dr. Salas, do you have --

A. Can you repeat the question?

Q. Yes. Do you have any understanding of the legal claims that you have asserted in this case against eight different people and entities?

A. I'm not an attorney. I'm a physician.

Q. So tell me in physician language what are you complaining about?

A. That your client, and you're part of this, did an irresponsible investigation, coming to conclusions and innuendos that ruined my reputation, my name, my life, and a lot of people around me.

And you were part of this. You came to conclusions un-based. And you just didn't want to see facts that I provided.

And the general attitude was that people would not belabor their time to actually read the truth.

And this is full of innuendos, factual mistakes. And here's the genesis. This is the genesis of the horrible, horrible, horrible grief

that you made me through all these years.

MR. SCHLAFLY: Let the record reflect the witness is pointing to Exhibits 1 through 4.

THE WITNESS: 1 through 4. Error after error. And on top of that, when ABIM claims -- Dr. Coleman claims this constitutes the final decision of ABIM in the matter, which you were part of that decision, I get a lawsuit and I learn from the lawsuit, from a fax -- actually a -- a letter from a law firm to defend me.

And when you sued me again, your client, in Puerto Rico, I learned it from a patient that the question was like if I could continue practicing medicine.

Q. So could you -- I'm sorry, I don't want to interrupt your answer.

A. You were part of -- well, I'm sure the first letter here from Miss Langdon.

MR. SCHLAFLY: The witness is pointing to Exhibit 1.

THE WITNESS: Exhibit 1. No lawyer or nothing was reviewed. This letter is inflammatory, false, and obviously it's full of innuendos and just...

Q. So, Dr. Salas, let's focus on what's been

marked as Exhibit 1, the letter that you contend is false and full of innuendos.

A. Yes.

Q. That's the May 8 letter from Miss Langdon to you, correct?

A. Yes.

Q. Did she send that letter to anyone other than you?

A. I don't -- I cannot attest to that.

Q. Do you have any evidence sitting here today that this letter which is marked personal and confidential was sent to anyone other than you?

A. I cannot attest to that because --

Q. You have no --

A. -- I was --

Q. -- Dr. Salas, sitting here today, you have no evidence that Exhibit 1 was sent to anyone other than you; isn't that right?

A. In page -- the second page of this letter: We will notify the medical board in every jurisdiction in which you are licensed.

I don't know what they did. But it's a clear threat of what they're going to do.

Q. Okay. To your knowledge do you have any evidence that was done?

A. I cannot attest what this lady did or did not do.

Q. You have no evidence sitting here today that ABIM sent this letter to anyone other than you; isn't that right?

A. Again, I cannot testify what ABIM did or did not do. What -- it's clear.

Q. Let's move to Exhibit number 2. This is a letter that Miss Lynn Langdon sent to you on December 7, 2012, correct?

A. It says here December 7, 2012, representing all the people -- it's an official letter, all those people. So she spoke apparently with everybody on the left side.

Q. The letter is marked personal and confidential, correct?

A. Yes.

Q. It's on ABIM letterhead, correct?

A. Yes.

Q. Okay. Sitting here today, you have no evidence that Miss Langdon sent the letter that's been marked as Exhibit 2 to anyone other than you; isn't that right?

A. I do have evidence. It says Hara Jacobs right here. So she did send it to somebody else.

God knows who else. It's right here. It's right here. It says carbon copy Hara Jacobs, Esquire. So that's my evidence.

Q. Do you have --

A. That is my evidence. I don't know if she sent it to somebody else, if you forwarded it to somebody else.

Q. Do you have any evidence --

A. There are at least two copies of this letter which I cannot account for.

Q. Do you have --

A. Your question, please?

Q. Do you have any evidence that Miss Langdon sent the letter marked personal and confidential to anyone other than you and ABIM's legal counsel?

A. Again, I cannot testify what you did with this letter or she did with this letter.

But again, let me -- let me -- here. It says -- it clearly says that name and it clearly says a lot of people from ABIM.

I don't know if she discussed it with those people. God knows what draft those people read.

I'm guessing she's representing ABIM. She's the chief operating officer.

Q. Have you ever seen company letterhead before?

A. I know what a chief operating officer. She represent the company.

Q. Dr. Salas, have you ever seen letterhead from any company or organization before today?

A. Which -- which one are you referring? I'm sure the one --

Q. Any. Any. In your whole life have you ever seen letterhead from a company or an organization?

A. I'm sure I crossed a few, yes.

Q. Do you understand that the people listed on the left side of the letterhead are listed there because they're officers or employees of the American Board of Internal medicine?

A. A letter of this magnitude where they're revoking myself and they send it to a counsel, I'm sure somebody of these people read it or had a draft or had knowledge of this. What they did with that I don't know.

But I can assure you that giving what is said here, I'm sure she didn't sit down and by herself came up with all this. Or did she? I don't know.

Q. Dr. Salas, sitting here today you have no evidence that Exhibit 2 was sent by Miss Langdon to anyone other than you and ABIM's legal counsel?

A. I cannot testify to what she did, what she

did not do, and who did she discuss with this.

Q. Okay. Exhibit number 3, which you have sitting in front of you, which --

A. You were part of it, yes.

Q. -- is the decision of the Staff Credentials Committee, correct?

A. Yes.

Q. Okay. Sitting here today, do you have any evidence that this decision was sent to anyone other than you?

A. I don't know what they did or did not send. So I cannot testify if they never sent it to somebody else.

Q. Exhibit number 4, which is the decision of the Board Designated Panel of the American Board of Internal Medicine, you do not have any evidence sitting here today that this decision was sent to anyone other than you?

A. Other than when ABIM used this in their claims and counterclaims and letters to me and reference and makes it public knowledge.

Q. And underneath there, the next exhibit was Exhibit 5, correct, was that also -- that was the last one that you referred to in your pile of did you harm; is that -- no, that's the answer.

A. Exhibit 5?

Q. No, it was Exhibits 1 through 4, correct?

A. Well, a lot of things did me harm. But this is just blatant irresponsibility.

Q. Dr. Salas, haven't you put all of this information up on your doctorsjustice website?

A. After you sued me publicly and put all this on your complaint.

Q. Are you claiming that you you've been injured by the mere fact that ABIM filed --

A. Twice.

Q. -- a -- let me finish my question please. Or Bob will kill us both.

Are you contending that the fact that ABIM filed a claim for copyright infringement against you in New Jersey and in the District of Puerto Rico injured you in some way, the mere fact of the filing of the complaint?

A. You made it public. The fact that a patient came to me with one of the complaints should concern ABIM.

Q. Are you seeking damages in this case because ABIM filed a complaint for copyright infringement against you?

A. Again, all legal matters have to go through

my attorneys.

Q. Do you contend that when your status on ABIM's website changed to revocation recommended, that that statement was not true?

A. That statement -- that statement was inflammatory and defamatory.

MR. RIVERA-SOTO: You can use legal terms now. Interesting.

MR. SCHLAFLY: Objection. Stop acting in an unprofessional manner.

MR. RIVERA-SOTO: Oh, I shall, as soon as your client stops being so unprofessional in his responses. But obviously being polite to him doesn't work, so...