

1 it's got a bullet that says, "Pricing strategy for each
2 channel," with the top channel being Hanger. Do you see
3 that?

4 A. I do.

5 **Q. And specifically it says, "Quickest need is
6 Hanger," and the second bullet says, "Take advantage of
7 apparent C leg issues." What does that mean?**

8 A. It was reported in the field that C-Leg was
9 having functional or quality issues, that there was
10 certain discontent in the market, and we felt that was
11 a -- an opening to gain market share at the expense of
12 the C-Leg.

13 **Q. So when you heard about this discontent with the
14 C-Leg, Freedom reached out to Hanger presumably and
15 pressured it with more marketing. Would that seem fair?**

16 MR. McCONNELL: Object to form.

17 BY MR. ZACH:

18 **Q. Let me rephrase. How specifically would Freedom
19 go about taking advantage of the C-Leg 4 issues you just
20 described?**

21 A. I think the most common would be if someone has
22 experienced a problem, in this case with the C-Leg, or
23 any other product, it would be a moment that would
24 present a moment of dissatisfaction toward the product
25 that the customer was using and it would be an

1 opportunity for the prosthetist to consider switching to
2 another brand. And so we would always be looking for
3 those opportunities to sell more products.

4 **Q. What did Freedom do in response to this
5 opportunity?**

6 A. I don't know specifically. I do know that it
7 was reported broadly in the marketplace, so I'm sure
8 that any -- that the reps would likely, I should say,
9 have probed for satisfaction with the existing products
10 that the prosthetist was using. And any time there was
11 a problem that would present an opportunity for us on
12 the other side of the coin, we would take advantage of
13 that situation.

14 **Q. And, in fact, sales to Hanger in this time
15 period, early 2017 and beyond, sales to Hanger
16 increased, right?**

17 A. I believe so.

18 **Q. Why don't we go off the record for just a
19 moment.**

20 (Discussion off the record.)

21 (Whereupon, at 12:45 p.m., a lunch recess was
22 taken.)
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