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8 **Q. If OttoBock had not raised its bid and it**
9 **had been -- and both Össur and OttoBock had stayed at**
10 **their initial bids, what would you have recommended to**
11 **the board?**
12 A. I wasn't in that situation. I don't know.
13 **Q. Did you have any discussions, after the**
14 **first bids, about what you would do if the bids didn't**
15 **come up?**
16 A. I know we did. You know, if it was
17 tied -- I am not going to speculate. I know we talked
18 about it, but we all just believed they would come up.
19 Nobody gives their best price first. We all believed
20 that we should go back and keep pushing and pushing,
21 and try to get the bids up. We were shocked that
22 Össur did not raise theirs, actually. We weren't
23 surprised that OttoBock went up. Nobody puts their
24 best foot forward first.
25 **Q. Again, I understand from talking to you**

1 And it was -- I am not saying I presented
2 it that way, but that's the basic logic of the
3 argument. Not that there was a pitch that's --
4 **Q. Okay.**
5 A. And they didn't care.
6 **Q. Yeah.**
7 A. They were -- yeah. Hard to work with.
8 **Q. It's probably the diplomatic word.**
9 A. Yeah. They're off my Christmas list.
10 **Q. So when did you -- so if, assuming a close**
11 **on September -- on approximately September 22nd, when**
12 **did you learn that you would not be working at**
13 **Freedom?**
14 A. September 17th or 18th.
15 **Q. Okay.**
16 A. They let me know the Friday before the
17 Monday it closed that I was fired.
18 **Q. Okay.**
19 A. Or I am sorry, I was resigning without
20 prejudice, or something like that. And they gave me
21 the document to sign.
22 **Q. Had you had discussions about a role for**
23 **you at Freedom prior to that?**
24 A. With OttoBock?
25 **Q. Yeah.**

1 **that the banks were not fun to work with here. What**
2 **was your pitch to them, in trying to get them to**
3 **extend to finalize the deal here? When you are in**
4 **this late-August time frame. What do you tell -- why**
5 **should they -- why should they extend to let you close**
6 **on the sale?**
7 A. Well, first of all, no judge is going to
8 think that they're not complete assholes and hold them
9 not accountable for screwing up a deal when it's on
10 the table. So there -- I don't have to use a lot of
11 leverage here, because they're going to look like
12 idiots in front of a judge if they shut down a
13 business and terminate all the employees and walk away
14 from all their money when it's sitting on the table.
15 So that's really not -- I am not -- that
16 isn't where I was, mentally. Mentally, where I was
17 is, they need to give an extension before I am asking
18 for it, so that I don't look bad, so that we can
19 maximize whatever terms and conditions we can get for
20 the transaction for all the investors and all the
21 creditors. So stop screwing around, and give an
22 extension now. Because you know you are going to give
23 an extension. You know you can't not give me an
24 extension. Give it to me now, so that I have leverage
25 with the buyers.

1 A. No. I wasn't in the plan from the
2 beginning. It's easy to spot that when you are first
3 talking to somebody. I don't think I am a great
4 person to work for a tyrant. Or someone that's that
5 personality type. I don't say, "yes, sir." I say,
6 "why?" So it wasn't a good fit.
7 Tyrant's the wrong word. They had a very
8 strong authoritarian personality. It's late in the
9 day. I shouldn't have said that.
10 **Q. That's okay.**
11 A. Can you take that out?
12 **Q. I won't ask you to identify specific**
13 **names, there. What, if anything, were you told about**
14 **Ottobock's integration plans for Freedom?**
15 A. I was told they were going to shut the
16 business down.
17 **Q. Sorry, for OttoBock?**
18 A. OttoBock. OttoBock.
19 **Q. Did you say Össur, or did I hear it wrong?**
20 A. I have no idea. I mix them up all the
21 time.
22 **Q. Okay. OttoBock.**
23 MR. KENT: Do you want to take a break?
24 (Discussion held off the record.)
25 (Whereupon, a break was taken.)