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1 November of 2000, do you have a recollection of who was  
2 in charge of the claim department then?  
3 A. Ralph Mohnney.  
4 Q. Who was the CEO?  
5 A. Harold Chandler.  
6 Q. Who was the medical director for the company?  
7 A. Dr. Bob Anfield.  
8 Q. By the way, Dr. Anfield in 2000, when you  
9 came back, was located where physically?  
10 A. Same place as he was when I left, which is in  
11 the fifth floor in his office.  
12 Q. Right here in Chattanooga, Tennessee?  
13 A. Oh, yeah, yeah.  
14 Q. And in terms of the regional medical  
15 director, Dr. Vatt, where was he physically located,  
16 state?  
17 A. Yes, he had been moved, and he was -- I  
18 remember where he -- yes, yes, he had been in one of  
19 the offices up on the fifth floor which had big glass  
20 panes where a lot of the doctors were on the fifth  
21 floor, he was in there as well.  
22 Q. And when you got hired here again the second  
23 time, what was you hired in as?  
24 A. Associate medical director.  
25 Q. Did you have any officer status?

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1 A. Yes, if I remember rightly, you were at vice  
2 president level automatically and then after six months  
3 probation, you, if you showed your ability to function  
4 as an associate medical director, you would be promoted  
5 to a medical director.  
6 Q. All right. So associate medical director,  
7 corporate officer, and then if you survive the  
8 six-month period, you might get a change in title?  
9 MR. SHEA: Object to the form.  
10 BY MR. DARRAS:  
11 Q. Am I accurate?  
12 A. I believe that's what happened.  
13 Q. And let's talk about your compensation. When  
14 you were hired back in, were you offered a salary?  
15 A. I was.  
16 Q. And do you have a recollection of what you  
17 earned?  
18 A. It was 128,500.  
19 Q. All right. 128,500 --  
20 A. 500 dollars.  
21 Q. -- per year?  
22 A. Yes, annual, yeah.  
23 Q. And in addition to the \$128,500, were you  
24 offered any bonus opportunities?  
25 A. Yes, I was offered a prorated bonus

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1 opportunity.  
2 Q. Prorated meaning you were being hired in  
3 November and a couple of months left?  
4 A. I believe the decision about the bonus was  
5 made sometime like February or something like that, so  
6 yeah, it was going to be for the months up to when the  
7 bonus was distributed.  
8 Q. The bonus was going to be how much of your  
9 salary if you can recall?  
10 A. I believe it's 25 percent at that time. It's  
11 only decided, the amount of the bonus is only decided  
12 towards the end of whatever it is, fiscal year or, you  
13 know, it's decided at the same time every year whether  
14 to give a bonus or not and whether to -- what it  
15 should be.  
16 Q. All right. In addition to the \$128,500, the  
17 opportunity for the prorated bonus of 25 percent, what  
18 else if anything was included in your package?  
19 A. A relocation agreement and all the terms of  
20 the insurances that were a part of the benefit.  
21 Q. Let's talk about the relocation first. In  
22 terms of relocation expenses, what if anything did the  
23 company offer to pay?  
24 A. It offered to pay my relocation expenses. I  
25 didn't know exactly what the limit would be at that

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1 time, and, you know, so I went through with Dr. Vatt  
2 the things that I would like to bring back that we'd  
3 bought over time and he wanted to bring them back. And  
4 he said, well, it's not an international reassignment  
5 or anything like that, so it would have to go by the  
6 usual package that he generally did with physicians  
7 relocating within the United States, or the North  
8 American continent, because UnumProvident also has  
9 companies or offices in Canada. And I said, fine. And  
10 he said, what roughly was it when you moved back? And  
11 I said, well, I did it all on my own, and I, you know,  
12 loaded stuff on my own, nearly killed myself when I  
13 tried to do it, so it's going to be more expensive than  
14 that, because I don't intend to do that again. And he  
15 said, okay, but roughly blah, blah. And so then I gave  
16 him a rough estimate, and he said yeah, we can do that.  
17 Q. Let's talk about what it turned out to be  
18 How much?  
19 A. I believe 25 or 26  
20 Q. Thousand?  
21 A. I think so.  
22 Q. All right.  
23 A. 25 to 26 thousand dollars, yeah, sorry.  
24 Q. In addition to the 25 percent bonus, the  
25 \$128,500, the \$26,000 rough relocation expenses, share

23 (Pages 86 to 89)

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EXHIBIT  
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1 Q They set it up according to the  
2 generic policies you have?  
3 A They set it up as far as the  
4 policies they had.  
5 Q If a company bought a slightly  
6 different policy, how would you know that  
7 information when you're working on the person's  
8 claim?  
9 A Well, it goes back to like the  
10 time before I get it an LTD specialist has  
11 already handled it. He should have found all  
12 this stuff out for me before I ever received the  
13 claim.  
14 Q Okay.  
15 A Then after he has made all of his  
16 reviews.  
17 Q What is his -- what kind of stuff  
18 does he review?  
19 A He takes the first initial claim.  
20 He takes it in first.  
21 Q Does he decide to pay it or not?  
22 A Yes.  
23 Q Okay.  
24 A He's the one that makes the  
25 decision if it's going to be a SHU claim or

1 something that they made the decision it's likely  
2 they're going to stay disabled up to age 65, it  
3 goes to SHU.  
4 A Correct.  
5 Q If it's something that they might  
6 improve from and be able to return to work, what  
7 does the case go?  
8 A It goes back to a specialist that  
9 handled it to begin.  
10 Q The original LTD specialist?  
11 A Correct.  
12 Q Okay.  
13 A Or if we got a new claim from  
14 them, I got to where I would review mine because  
15 there was so many of them that we were getting  
16 that there was too many unanswered questions.  
17 Q Give me some examples.  
18 A Like I had psych claims that  
19 should have been on physical disability instead  
20 of mental disability and I would send those back  
21 to them and tell them they needed to look at it  
22 because the person had cancer. The reason they  
23 went to see a psychiatrist is because they  
24 couldn't deal with they were going to die.  
25 I would return those claims back

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1 they're going to try to get this man back to work  
2 or not.  
3 Q Okay. So I'm going to come back  
4 to the SHU claims in a little bit to make sure I  
5 understand the difference in the types of claims,  
6 what you were talking about.  
7 So the LTD specialist is somebody  
8 who is -- is that another type of customer care  
9 representative?  
10 A Uh-huh.  
11 Q Yes?  
12 A Yes.  
13 Q Okay. And they decide whether or  
14 not to pay the case?  
15 A Yes.  
16 Q Okay. Do they ever make a  
17 determination of whether or not there are certain  
18 cases that are not going to go the full duration  
19 of the policy? In other words, if somebody is 40  
20 and the policy pays to 65, do all those cases get  
21 paid up to age 65?  
22 A If they have a diagnosis that they  
23 don't think they're going to return to work, then  
24 they send it to SHU. That's when I would get it.  
25 Q I got you. So if they have

1 because they had set them up wrong and I went to  
2 management and complained that we shouldn't have  
3 these claims and they shouldn't be maxing out  
4 these people just because they're depressed and  
5 they have cancer.  
6 Q Did you always have success  
7 getting management to change their mind when you  
8 found those cases?  
9 A I'm a very persuasive person when  
10 it comes to my job. Most of the time they said  
11 you're right.  
12 Q Did they ever say you're wrong?  
13 A No. They always sent back -- they  
14 got to where they took my word for it.  
15 Q Okay. Now, if you had a question  
16 about one of those files that you were trying to  
17 decide whether or not it should keep getting paid  
18 or not, what kind of training did you have as far  
19 as what to look at medically for these people?  
20 A I didn't have any training.  
21 Q Okay.  
22 A The only training I had was the  
23 training on the computer, four hours a day, five  
24 days a week. That was it.  
25 Q Okay.