

1 A. And I would have distanced myself. But
2 everything that I've ever seen her do or that she has
3 consulted with me about, I felt comfortable with her
4 doing.

5 Q. And did you train her how to do episiotomies
6 on bats?

7 A. Yeah. Yeah.

8 Q. Okay. Do you know anybody who has performed
9 more episiotomies on bats than Amanda Lollar?

10 A. No.

11 Q. Do you know any veterinarians who have done
12 more episiotomies on bats than Amanda Lollar?

13 A. No, I do not.

14 Q. Dr. Jarrett, have you seen the videotape of
15 the episiotomy that was done in this case that we're
16 here on today?

17 A. Yes.

18 Q. And tell the Court what your opinion is as to
19 how that episiotomy was done.

20 A. Oh, it was -- it was textbook. I mean, it was
21 as good as it can get. You know, it -- you know, you
22 have to, you know, make the opening bigger or -- so that
23 involves cutting the skin and a little bit of the mucus
24 membrane just inside the vestibule. And she never
25 actually went into the vagina itself. You know, that

1 first part of the birth canal from -- from our viewpoint
2 is considered the vestibule.

3 And so you have -- you have to cut a
4 little bit of mucus membrane. And so there was,
5 obviously plenty of, you know, topical anesthetic
6 applied. The membrane and the mucus membrane -- the
7 skin and the mucus membranes, you know, at that point
8 are so thin that it's going to soak up all the Cetacaine
9 and render it completely numb.

10 Q. Doctor, did she -- and I'm going to quote, Cut
11 the bats's vagina with scissors three times?

12 A. No, that is incorrect.

13 Q. Was anesthetic used properly?

14 A. Yes.

15 Q. Is -- I mean, that's how you do it?

16 A. Yeah. Yeah. I mean, you really can't, you
17 know, at that point put them under with Iso or anything
18 else. I mean, you don't know if the baby is alive or
19 dead.

20 And you give a bat Isoflurane or
21 injectable drugs, then the baby's blood pressure is
22 going to fall. And if it falls, you may not be able to
23 get it back up. So in order to try to have a live
24 birth, you know, you don't -- you just can't give any
25 more anesthetic than absolutely necessary to get the job

1 done for an episiotomy. I mean, it's -- you know, if
2 you can -- if you can render it numb with a topical,
3 then you should be good to go.

4 Q. In your opinion, Doctor, was the episiotomy in
5 the video that you watched done humanely and skillfully?

6 A. Yes.

7 Q. When you viewed the video, did she pull too
8 much on the bats's vagina and the uterus -- and the
9 uterus prolapsed?

10 A. No, it did not.

11 Q. Okay. And you taught her about tooth
12 extraction?

13 A. Yes.

14 Q. Dr. Jarrett, have you ever seen Amanda Lollar
15 commit animal cruelty?

16 A. No, I have not.

17 Q. Would you have anything to do with her if --
18 if -- if she did?

19 A. No, I would not.

20 Q. Doctor, are you familiar with -- Well, let me
21 ask it this way. Do you ever get calls from other
22 veterinarians concerning bats or Amanda Lollar?

23 A. I have.

24 Q. Okay. And are you familiar with her
25 reputation, generally, among veterinarians as far as her

1 reputation for caring for bats?

2 A. Yes, I'm familiar with it. I mean, they --
3 they hold her in high regard and I have never heard a
4 negative thing about her. And sometimes they call me
5 and then I refer them to her.

6 Q. So a veterinarian will sometimes call you say,
7 Hey, I have got a bat --

8 A. Yes.

9 Q. -- that's sick or injured and you actually
10 send them down the street to Amanda Lollar?

11 A. Yeah, give them her phone number.

12 Q. And have you yourself taken her an injured bat
13 that you found?

14 A. Yes.

15 MR. TURNER: Pass the witness.

16 **CROSS-EXAMINATION**

17 BY MS. CUMMINS:

18 Q. What tracks did you take when you were in
19 veterinary school? Did you take exotic medicine?

20 A. No, I did not.

21 Q. What tracks did you take?

22 A. Mostly small animal.

23 Q. What percent of the animals you treat are
24 bats?

25 A. Probably one percent.