

**UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF GEORGIA
MACON DIVISION**

ASHLEY DIAMOND,

Plaintiff,

v.

TIMOTHY WARD, *et al.*,

Defendants.

No. 5:20-cv-00453-MTT

**PLAINTIFF’S DEPOSITION DESIGNATIONS
FOR THE MAY 11, 2021 DEPOSITION OF DAVID S. ROTH, M.D.**

Citation Start	Citation End	Subject Matter
15:19	22:8	Educational background & background treating patients with gender dysphoria
22:9	24:10	Employment within GDC
26:7	29:15	Current role at Coastal, supervisors and reports
30:3	33:11	Knowledge of Plaintiff and her gender dysphoria
35:16	35:23	Knowledge of GDC policy and practice of not housing transgender women in women’s facilities
37:12	38:2	Knowledge of Plaintiff’s medication adherence
41:15	41:24	Knowledge of Plaintiff’s sexual assault reporting at Coastal
45:12	47:19	Decision to classify Plaintiff’s sexual abuse as “clinically relevant”
48:2	48:16	Knowledge regarding Plaintiff not engaging in any sexual offenses
51:25	52:8	Role of GDC in gender dysphoria treatment decision-making
52:9	57:19	GDC’s decision not to approve unanimous recommendation of treatment team
57:20	58:25	Opinion that goals of gender dysphoria treatment plan include ensuring safety and appropriate housing placement
65:12	65:22	Opinion on gender expression accommodations
68:6	78:6	Observations and opinion regarding Plaintiff’s persistence of gender dysphoria symptoms and presence of additional stressors
79:18	80:7	Introduction of Exhibit Roth 4: July 2, 2020 Psychology/Psychiatry Transfer Evaluation
80:11	83:22	Observations and opinions regarding mental health recommendation to transfer Ms. Diamond away from Coastal
86:10	87:22	Suicide precautions for Plaintiff
95:20	96:10	Deponent’s memory issues impacting testimony
102:5	102:24	Roth Exhibit 9: October 31, 2020 Medical Report

Citation Start	Citation End	Subject Matter
106:3	107:1	Plaintiff’s gender dysphoria-related castration attempts
115:23	116:20	Suicide precautions
116:21	119:17	Plaintiff’s sexual abuse history and mental health consequences
119:18	120:11	Plaintiff’s disciplinary charge and possibility of whether incident was exaggerated or accidental
120:12	123:15	MH III transfer recommendation for Plaintiff
127:6	128:4	Facial hair removal for Plaintiff
129:16	130:23	Plaintiff’s disciplinary charge and feeling of being targeted and falsely charged, and possibility of whether incident was exaggerated or accidental
142:6	143:1	Opinion regarding whether Plaintiff “would be a danger to the other women” in a female facility and potential safety benefits of housing Plaintiff in female facility

Respectfully submitted,

Dated: June 4, 2021

/s/ A. Chinyere Ezie

A. Chinyere Ezie*

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CERTIFICATE OF SERVICE

I hereby certify that, on June 4, 2021, the foregoing document and all attachments were served on all counsel of record through the Court's CM/ECF system.

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