

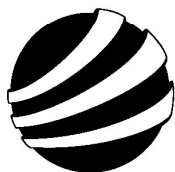
EXHIBIT 12

In the Matter Of:
Hammons vs University of Maryland Medical System

1:20-CV-02088-DKC

FATHER LOUIS ASOBI

April 11, 2022



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UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

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JESSE HAMMONS,)
Plaintiff,)
V.) Case No.
UNIVERSITY OF MARYLAND MEDICAL) 1:20-CV-02088-DKC
SYSTEM CORPORATION, et al.,)
Defendants.)

-----x Pages 1-108

REMOTE VIDEOTAPED DEPOSITION OF
FATHER LOUIS ASOBI
Monday, April 11, 2022
Towson, MD

Reported by: Sherry L. Brooks
Certified LiveNote Reporter

Job No. J8078715

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April 11, 2022
10:03 a.m.

Remote videotaped deposition via Zoom
videoconferencing of Father Louis Asobi at:

Towson, MD

Pursuant to notice, before Sherry L. Brooks,
Certified LiveNote Reporter and Notary Public, in and
for the State of Maryland.

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18

19 ALSO PRESENT:

20 George Ellis, Videographer

21

22

1 Saint Joe's remaining Catholic.

2 BY MR. GOLDMAN:

3 Q. Thank you. Earlier you said that part of
4 your job deals with the ethical and religious
5 directives for Catholic Health Care Services; is that
6 correct?

7 A. Yes.

8 Q. Are those referred to as the ERDs?

9 A. Yes.

10 Q. What generally are the ERDs?

11 A. The ER- -- the ERD is a document put
12 together by the entire body of the United States
13 Catholic Bishops Conference, and that document is put
14 together for all Catholic hospitals in the United
15 States to be a document that will guide them in the
16 practice of medicine.

17 Q. And what is the basis for your knowledge
18 about the ERDs?

19 A. The basis of my knowledge is that I
20 studied it. It's part of my education to be the vice
21 president of Mission Integration and I've learned in
22 seminars and workshops for the interpretation of the

1 document and implementation of the document in all
2 Catholic hospitals within the United States.

3 Q. And you mentioned that the ERDs are
4 published by the United States Conference of Catholic
5 Bishops; is that correct?

6 A. Yes.

7 Q. Have you read the entirety of the ERDs?

8 A. I have.

9 Q. And when was the last time you read the
10 entirety of the ERDs?

11 A. I just read it again over the weekend.

12 Q. Wonderful. Me, too.

13 Are the ERDs updated regularly?

14 A. They're updated based on whenever the
15 bishops conference see it -- when they deem that it
16 is time for a review, they will do that, depending on
17 things happening within the society and in our
18 culture. So right now we are working with the sixth
19 edition.

20 We don't know whenever they're ready to
21 come up with the seventh edition, so we are working
22 with this just like we did the -- what do you call

1 THE WITNESS: Oh, okay. Sorry.

2 MR. GOLDMAN: That was my fault. I
3 apologize.

4 Oh, and I'm sorry. For the court reporter
5 again, are we going up from where we left off with
6 the last deposition?

7 THE REPORTER: I'm sorry. Usually --
8 typically, when we do different witnesses, we start
9 with 1.

10 MR. GOLDMAN: That's fine. So we'll make
11 that 1.

12 BY MR. GOLDMAN:

13 Q. All right. Father Asobi, do you see this
14 document in front of you?

15 A. Yes.

16 MR. GOLDMAN: I'll mark this as Exhibit 2.

17 (Exhibit Number 2 was marked for
18 identification and was attached to the deposition.)

19 MR. GOLDMAN: And I'll represent that it
20 has been produced as UMMS with the Bates ending in 4.

21 BY MR. GOLDMAN:

22 Q. Have you ever seen this document before?

1 A. Yes, I've seen the document.

2 Q. Would you like to take a second to reread
3 it before I ask you questions about it?

4 A. Okay. Okay. I've read it.

5 MS. WIGGER: So do you have a question
6 pending?

7 MR. GOLDMAN: I have scrolled down to
8 page 2 to give the witness a chance to read it. I
9 wasn't sure if he was done reading it yet.

10 MS. WIGGER: Oh, I thought the ready was
11 for a question. Never mind.

12 A. Okay.

13 BY MR. GOLDMAN:

14 Q. Okay. So I'm going back up to page 1 of
15 Exhibit 2.

16 This was prepared by the National Catholic
17 Bioethics Center, right?

18 A. Yes.

19 Q. And can you remind me what the National
20 Catholic Bioethics Center's relationship with the
21 Catholic church is?

22 MS. WIGGER: Object to form.

1 A. The National Catholic Bioethics Center is
2 part of the Catholic church. It is a center that is
3 instituted by the Catholic church to evaluate all
4 Catholic hospitals to see that they are in line with
5 what the church teaches and to be sure that they are
6 applying the ERDs in their practice of medicine.

7 And they visit each Catholic hospital to
8 do an assessment, just like the joint commission
9 does, and the assessment has been done in the
10 hospital to evaluate the ERD, the ethical and
11 religious directives, and also how the hospital
12 applies that in their practice of medicine, and they
13 usually make a report.

14 That goes -- after the draft has been
15 agreed upon as fair and accurate, the report goes to
16 the local ordinary, who may be a bishop or an
17 archbishop or a cardinal, who will then discuss the
18 report with the hospital.

19 BY MR. GOLDMAN:

20 Q. Understood. Do you -- did the conclusions
21 and recommendations in documents like the one that
22 you're looking at -- do those need to be followed by

1 Catholic hospitals?

2 MS. WIGGER: Object to form.

3 Go ahead and answer.

4 A. Yes.

5 BY MR. GOLDMAN:

6 Q. So this document that we're looking at
7 must be followed by Saint Joseph's?

8 MS. WIGGER: Object to form.

9 A. Yes, because if you look at the -- the
10 first section that is quoted just up here at the
11 top -- the top --

12 BY MR. GOLDMAN:

13 Q. The top of the first page?

14 A. Yes.

15 Q. Okay.

16 A. Can you go up a little bit? Here. You
17 will see that as they prepared this document they
18 quoted the ERD.

19 And the ERD -- you know, they put in the
20 USCCB, the United States (inaudible) Bishops
21 Conference of the ERD, the fifth edition, and they
22 put it in here, which means they are beginning this

1 conversation in line with what the bishops have put
2 together in the ERD and they put it in the summary.

3 Q. So do you understand this document to be
4 an accurate summary of how the ERDs approach
5 transgender health care?

6 MS. WIGGER: Objection. Hold on. Object
7 to form.

8 You may answer.

9 A. This is how the NCBC interpreted or
10 presented to the bishops who verified it and it
11 became part of the practice in Catholic hospitals.

12 BY MR. GOLDMAN:

13 Q. And that's based on the ERDs, right?

14 A. Yes.

15 Q. So it's fair to say that this document
16 summarizes how the ERDs approach transgender health
17 care?

18 MS. WIGGER: Object. Object to form --
19 sorry.

20 A. It summarizes the approach, which is still
21 in conversation until today as we speak.

22 BY MR. GOLDMAN:

1 Q. Understood. Does this document describe
2 the approach to transgender health care at Saint
3 Joseph's?

4 MS. WIGGER: Object to form. It may also
5 be helpful if we set a -- a time frame for that
6 question.

7 MR. GOLDMAN: Currently.

8 MS. WIGGER: Same objection.

9 You may answer.

10 A. Yes.

11 BY MR. GOLDMAN:

12 Q. According to this document, "gender
13 transitions should never be performed, encouraged, or
14 positively affirmed as good in Catholic health care,"
15 right?

16 MS. WIGGER: Object to form.

17 A. Yes.

18 MR. GOLDMAN: Sorry. Counsel, that was a
19 direct quote from the document. I'll just represent
20 that that is in the document.

21 MS. WIGGER: That wasn't clear, so thank
22 you.

1 BY MR. GOLDMAN:

2 Q. And that includes surgeries, the
3 administration of cross-sex hormones or pubertal
4 blockers and any social or behavioral modifications.

5 That is also a quote, correct?

6 A. Yes, according to the document.

7 Q. Is it also true that, according to this
8 document, maintaining cross-sex hormone treatment,
9 even if the patient is being treated for unrelated
10 reasons, is cooperation with evil; is that correct?

11 MS. WIGGER: Object to form.

12 A. According to the document.

13 MS. WIGGER: I'm sorry. Is that one also
14 a quote?

15 MR. GOLDMAN: Yes, where it says,
16 "maintenance of cross-sex hormone regimens," the
17 first bullet point under cooperation with evil. I'll
18 just highlight it.

19 MS. WIGGER: Same objection.

20 MR. GOLDMAN: There it is right there.

21 THE WITNESS: Can you see that, Counsel?

22 MS. WIGGER: I can see the document.