

1 UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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ADRIAN SCHOOLCRAFT,

3
4 PLAINTIFF,

5 -against- Case No:
10 Civ. 6005
6 (RWS)

7 THE CITY OF NEW YORK, DEPUTY CHIEF MICHAEL MARINO,
Tax Id. 873220, Individually and in his Official
Capacity, ASSISTANT CHIEF PATROL BOROUGH BROOKLYN
8 NORTH GERALD NELSON, Tax Id. 912370, Individually
and in his Official Capacity, DEPUTY INSPECTOR
9 STEVEN MAURIELLO, Tax Id. 895117, Individually and
in his Official Capacity, CAPTAIN THEODORE
10 LAUTERBORN, Tax Id. 897840, Individually and in his
Official Capacity, LIEUTENANT WILLIAM GOUGH, Tax Id.
11 919124, Individually and in his Official Capacity,
SGT. FREDERICK SAWYER, Shield No. 2576, Individually
12 and in his Official Capacity, SERGEANT KURT DUNCAN,
Shield No. 2483, Individually and in his Official
13 Capacity, LIEUTENANT CHRISTOPHER BROSCART, Tax Id.
915354, Individually and in his Official Capacity,
14 LIEUTENANT TIMOTHY CAUGHEY, Tax Id. 885374,
Individually and in his Official Capacity, SERGEANT
15 SHANTEL JAMES, Shield No. 3004 and P.O.'s "JOHN DOE"
#1-50, Individually and in their Official Capacity
16 (the name John Doe being fictitious, as the true
names are presently unknown) (collectively referred
17 to as "NYPD defendants"), JAMAICA HOSPITAL MEDICAL
CENTER, DR. ISAK ISAKOV, Individually and in his
18 Official Capacity, DR. LILIAN ALDANA-BERNIER,
Individually and in her Official Capacity and
19 JAMAICA HOSPITAL MEDICAL CENTER EMPLOYEES "JOHN
DOE" #1-50, Individually and in their Official
20 Capacity (the name John Doe being fictitious, as
the true names are presently unknown),
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22 DEFENDANTS.
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23 DATE: October 17, 2014
24 TIME: 10:20 A.M.

25 (Deposition of JOHN ETERNO, PhD)

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DATE: October 17, 2014

TIME: 10:20 A.M.

DEPOSITION of an Expert Witness,
JOHN ETERNO, PhD, taken by the Respective Parties,
Pursuant to a Notice and to the Federal Rules of
Civil Procedure, held at the offices of the New
York City Law Department, 100 Church Street,
New York, New York 10007, before Nathan MacCormack,
a Notary Public of the State of New York.

J. ETERNO

1 A. I would say about a week.

2 Q. It took you about a week?

3 A. Yeah.

4 Q. Are all of the opinions in your report based on
5 generally accepted policing practices in the policing
6 field?

7 A. I believe so.

8 Q. Does being generally accepted mean that they are
9 generally adopted?

10 A. I believe so. I believe that the New York City
11 Police Department is a model department and its practices
12 are within the standards of police departments throughout
13 the United States, and certainly New York State.

14 Q. Are any generally accepted practices found in
15 recognized authoritative treatises?

16 A. What do you mean by "treatises"?

17 Q. Are there any documents, for example, books that
18 would contain generally accepted practices for the policing
19 field?

20 MR. SMITH: Objection to the form.

21 A. Of course.

22 Q. And what are those?

23 A. We have the I.A.C.P. Model Policies, for example,
24 that's the International Association of Chiefs of Police;
25 certainly organizations like P.E.R.P., the Police Executive