

**Exhibit 35**

Ceceilia Davoli, M.D. - 11/21/03

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1 QUYAISHA COLES, MINOR, IN THE  
2 BY HER MOTHER AND NEXT FRIEND,  
3 VERONICA SCOTT,  
4  
5 Plaintiff CIRCUIT COURT  
6  
7 vs. FOR  
8  
9 KENNEDY KRIEGER INSTITUTE, BALTIMORE CITY  
10 INC.,  
11  
12 Defendants 24-C-01-004337  
13

14 The deposition of CECEILIA DAVOLI, M.D.  
15 was held on Friday, November 21, 2003, commencing at  
16 11:16 A.M., at the Law Offices of Goodell, DeVries,  
17 Leech & Gray, LLP, 20th Floor Commerce Place, One  
18 South Street, Baltimore, Maryland 21202, before  
19 William J. Counts, Notary Public.

20 APPEARANCES:

21 EVAN K. THALENBERG, ESQUIRE  
On behalf of Plaintiff

DONALD DEVRIES, JR., ESQUIRE  
On behalf of Defendants

ERICKA L. KLEIMAN, ESQUIRE  
On behalf of Defendants

LARRISA N. MILLER, ESQUIRE  
On behalf of Defendants

REPORTED BY: William J. Counts

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1 I would not necessarily completely agree with that  
 2 statement in isolation.  
 3 Q Okay.  
 4 A If you are asking -- so I don't agree with  
 5 it in isolation.  
 6 Q So what does it have to be read in context  
 7 with?  
 8 A This is the consent form.  
 9 Q What if I show you the lead paint  
 10 violation notice for this house. Will it help?  
 11 MR. DEVRIES: Objection. Let her answer  
 12 the question.  
 13 A This is a consent form, I agree with that.  
 14 This consent form has several parts. The first part  
 15 of the consent form is a general summary of  
 16 information about lead, and to the best of my  
 17 recollection, that all of the consent -- this is for  
 18 the TLC study -- and all of the consent forms in all  
 19 four centers contain essentially the same language,  
 20 and were written by a group of investigators from  
 21 all four centers. And the language was reviewed by

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1 the IRB at Johns Hopkins for our particular center.  
 2 And also this was a consent form that was approved  
 3 by the NIEHS IRB. So in the context of the consent  
 4 form and the purpose for which the consent form was  
 5 written, in the context of this trial, then I do  
 6 agree with the statement.  
 7 Q I am glad we cleared that up. Doctor,  
 8 during the course of the Quyaisha Coles  
 9 participation in this, who was her primary treating  
 10 physician?  
 11 A Her primary care provider?  
 12 Q Yes.  
 13 A I honestly can't remember her primary care  
 14 provider, her pediatrician.  
 15 Q Who was responsible for her care and  
 16 treatment in regard to her elevated blood lead  
 17 levels during the time that she was a participant in  
 18 the TLC trials?  
 19 A Her primary care provider -- who was  
 20 responsible for the care and treatment?  
 21 Q Who was responsible for her care and

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1 treatment during the time that she was in the TLC  
 2 program? What doctor had primary responsibility for  
 3 her health and well being as it related to her  
 4 elevated blood lead levels?  
 5 A Well, that is difficult to answer with one  
 6 answer. I can tell you she had a primary care  
 7 provider. I can't remember who it was right at this  
 8 second, who was responsible for her overall medical  
 9 care, and that was her primary care provider.  
 10 With -- within the context of the TLC study we were  
 11 providing some care for the child, but I wouldn't  
 12 describe it as primary treatment of the child.  
 13 Q Okay.  
 14 A She was participating in a study.  
 15 Q So she wasn't getting treatment, right?  
 16 A I wouldn't describe it as primary  
 17 treatment. She was participating in a study, and we  
 18 were following her and monitoring her within the  
 19 context of this study, under the study protocol.  
 20 But her primary medical care, we did not become her  
 21 pediatrician, if that's what you are asking:

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1 Q Even for the elevated blood lead levels?  
 2 Is that your position also? Let me ask you this.  
 3 She was referred by Dr. Sedeke. Was Dr. Sedeke  
 4 still responsible for the care and treatment of  
 5 Quyaisha Coles in regard to elevated blood lead  
 6 levels while she was in the TLC program?  
 7 A Dr. Sedeke was the primary care provider  
 8 for this child. Dr. Sedeke had overall  
 9 responsibilities for the medical care of the child  
 10 in all respects, including the elevated blood lead  
 11 level.  
 12 Q Throughout the time that Quyaisha Coles  
 13 was in the TLC program, even though she had referred  
 14 Quyaisha Coles to Kennedy Krieger?  
 15 MR. DEVRIES: I will object. There was no  
 16 indication she referred the child to Kennedy  
 17 Krieger prior. That's the assumption of your  
 18 question.  
 19 Q Okay, assume that she referred Quyaisha  
 20 Coles to Kennedy Krieger for her elevated blood lead  
 21 levels.