

1 termination?

2 A. No.

3 Q. No? After your first pregnancy did you experience
4 postpartum depression?

5 A. I did not.

6 Q. How about after your second pregnancy?

7 A. I was told my depression was not a symptom of
8 postpartum. I believed it was, and it was not.

9 Q. Would you be surprised if Dr. Wuckert had written in
10 her notes that signs and symptoms of postpartum
11 depression and anxiety were discussed?

12 A. No, I would not be surprised.

13 Q. Okay. Did she tell you whether she felt that you were
14 experiencing postpartum depression?

15 A. She told me that usually after nine months, it's not
16 postpartum depression.

17 Q. After nine months?

18 A. Correct, of having the baby.

19 Q. When did you start experiencing depression after
20 having your second baby?

21 A. Following my job loss.

22 Q. What date did you lose your job?

23 A. October 1st, 2018.

24 Q. Would you be surprised that you discussed postpartum
25 depression on September 5th with Dr. Wuckert?

1 A. Would I be surprised?

2 Q. Yes.

3 A. No.

4 Q. Okay. Because you were saying that you didn't
5 experience it -- you didn't discuss this until after
6 your termination.

7 A. I believe my answer was that I did not experience it,
8 not that I didn't discuss it.

9 Q. Okay. What's the difference? Why would you be
10 discussing it if you weren't experiencing it?

11 A. It is a regular thing that we are asked after we have
12 children. We have to fill out a questionnaire and
13 other paperwork regarding postpartum depression.

14 Q. Okay. So Dr. Wuckert was just engaging in a
15 questionnaire, that wasn't you raising it with her?

16 A. Correct.

17 Q. Are you on any antidepressive medications right now?

18 A. Yes.

19 Q. What is it?

20 A. Prozac.

21 Q. And how long have you been taking that?

22 A. Since hospitalization in May of 2019.

23 Q. Why were you hospitalized?

24 A. For depression.

25 Q. And who did you see when you were hospitalized?

1 A. In Royal Oak Beaumont, Dr. Lu was who I was assigned
2 to.

3 Q. In Dr. Lu's notes, he states that you said that you
4 had increased depression since you gave birth to your
5 second child 10 months ago. Would that be accurate?

6 A. That would be accurate.

7 Q. He also said in your history you had two inpatient
8 psychiatric treatments and one inpatient substance
9 abuse treatment, but that was from age 16 to 19.

10 Would that be accurate?

11 A. Yes.

12 Q. And would you be surprised if -- well, I guess this is
13 not -- they didn't -- he states that as of 5-8-2019,
14 that you were diagnosed with postpartum depression?

15 A. Would I be surprised by that?

16 Q. Yes.

17 A. No.

18 Q. Who diagnosed you with postpartum depression in May of
19 2019?

20 A. May of 2019, my psychiatrist -- postpartum depression?
21 I have not received a postpartum depression diagnosis
22 that I am aware of. On my outpatient paperwork, it
23 says depression.

24 Q. So if he has that in your history, you're not sure
25 why?

1 A. I can understand why.

2 Q. And you reviewed the paperwork from Dr. Lu?

3 A. Specifically every piece? More than likely I glanced
4 at it.

5 Q. Do you recall that he diagnosed you with major
6 depressive disorder, severe recurrent?

7 A. Yes.

8 Q. Okay. Were you experiencing any other stressors in
9 your life that you feel were contributing to your
10 depression after you had your second baby?

11 A. Not knowing if I was going to be terminated for having
12 a baby.

13 Q. Were you having issues dealing with having to take
14 care of two children?

15 A. Issues happen when taking care of children more than
16 any other --

17 Q. Were you depressed about having to take care of two
18 children?

19 A. I was depressed on not being able to work.

20 Q. Were you depressed about having to take care of two
21 children?

22 A. No.

23 Q. Were you overwhelmed with having to take care of two
24 children?

25 A. Sure, yes.

1 Q. Who did you see at the Grosse Pointe Psychiatric
2 Services?

3 A. Dr. Guyer and Melissa Altamore.

4 Q. And are you still seeing those doctors?

5 A. Dr. Guyer is deceased as of May or June, and Melissa
6 Altamore, I still see.

7 Q. Do you recall in July of 2020 saying that your main
8 concern was your relationship with your husband?

9 A. I'd have to have some contextual -- my main concern
10 out of life? My main concern out of that day?

11 Q. I understand you didn't write these, but I'll read to
12 you the note from Grosse Pointe Services. Main
13 concern is relationship and husband and his anxiety
14 that prevents him from really participating as a
15 husband and father.

16 A. Sounds like that was the main concern of our
17 discussion that day.

18 MS. CHAMPA: I have an objection. It
19 appears as though you're reading from documents that
20 you got from doctors' offices, maybe through our
21 releases, perhaps. I mean, we had a standing request,
22 interrogatory request, to produce anything that you
23 were going to use at deposition, and we 've never
24 received anything.

25 MR. FEALK: This probably came in after our

1 discovery response. Why don't we get a copy of this
2 for you?

3 MS. CHAMPA: Anything else that you got
4 from doctors' offices?

5 MR. FEALK: Do you want it now or do you
6 want it after? I'm just going to go through a few of
7 these. We'll get you a copy, that's no problem.

8 BY MR. FEALK:

9 Q. So my question to you is: Your relationship with your
10 husband, wasn't this a cause of your depression, or at
11 least contributing to it?

12 A. During what time?

13 Q. This is July of 2013 -- sorry. July of 2020.

14 A. July of 2020, yes.

15 Q. Okay. And isn't it true that you told your therapist
16 that you had cheated on your husband?

17 A. Yes.

18 Q. And did you tell your husband that subsequently?

19 A. Prior to telling my therapist.

20 Q. Okay. And was that causing you stress?

21 A. No.

22 Q. It wasn't causing you any stress?

23 A. No.

24 Q. Okay. Would you agree with me that the emotional
25 distress that you say that you've suffered and whether
I don't know what information she has. Not that I'm

aware of.

1 I'm telling my attorney the things, some other things.

2 It would have been listed in there, but it's not --

3 Q. I don't want to know any attorney-client privileged
4 information, but if you have other facts about what
5 these individuals know pertaining to your case that
6 would not have been reflected in your answers to
7 interrogatories, I want to know that.

8 A. Pertaining to my case, as me individually being
9 discriminated against for being pregnant, no.

10 Q. Okay. Have you looked for a job after you were
11 terminated?

12 A. Yes.

13 Q. What have you done to look for a job?

14 A. I have created a LinkedIn profile. I have submitted
15 my resume to numerous jobs. I've created two resumes
16 for management positions and a resume for an assistant
17 position. I've submitted my resume in and out of the
18 city. I've submitted it in other states, regularly
19 receive alerts for job postings and listings that
20 Indeed has linked my resume to and apply for them.

21 Q. At the time that you responded to our discovery
22 requests, did you provide us with information on the
23 jobs that you applied to?

24 A. Can you tell me when that was?

25 Q. This would have been March 4th. Did you provide us

1 all the information you had on what you had applied to
2 at the time?

3 A. At the time, yes.

4 Q. Have you continued to apply to jobs after March 4th?

5 A. I've continued to search for jobs.

6 Q. Have you applied to any?

7 A. I don't recall applying to any since, no.

8 Q. Okay. Have you had a dispute with your husband about
9 whether you should go back to work?

10 A. A dispute? No.

11 Q. Okay. He's against you going back to work?

12 A. He is not forkeeping the house in order and me going
13 to work.

14 Q. Okay. But you still want to go back to work?

15 A. I will be going back to work once I find a career.

16 Q. Why haven't you applied for any jobs since March?

17 A. Since March of this year?

18 Q. Yes.

19 A. Because I've been working for Tinkergarden.

20 Q. And what have you been doing for Tinkergarden?

21 A. Leading virtual classes to children ages 18 months to
22 eight.

23 Q. And is that a full-time job?

24 A. It is not.

25 Q. And what do you get paid at Tinkergarden?

1 A. Depends on the season. Anywhere between 150 and 350 a
2 season, and maybe discretionary bonus if I exceed a
3 certain number of enrollees per class.

4 Q. What is a season?

5 A. A season is spring, summer, fall, winter.

6 Q. Okay. If you're only working part-time doing this,
7 how come you're not looking for a full-time job?

8 A. I'm looking for a job.

9 Q. You just haven't found any to apply to, is that
10 correct?

11 A. Correct.

12 Q. What kind of a job are you looking for?

13 A. Anything that's going to pay for daycare, car
14 insurance and a car to get there and then leave me
15 with some to add to the household expenses.

16 Q. You're not talking about as a benefit, you're talking
17 about how much you can make?

18 A. I'm talking about a base salary.

19 Q. Base salary. What base salary are you looking for?

20 A. No less than 50,000.

21 Q. No less than 50,000. And not all ads list how much
22 the salary is, correct?

23 A. More recently, since the pandemic, ads have listed
24 salary.

25 Q. Fair enough, but not all ads list the salary, correct?

1 A. Not all ads that I have seen list the salary, correct.

2 Q. Okay. So what kind of work are you looking for, what
3 positions?

4 A. Management positions and assistant positions.

5 Q. Okay. And you haven't seen any that came up since
6 March that are worth applying for?

7 A. I have seen multiple management positions in fast
8 food, and those are not worth applying for.

9 Q. Okay. And other than the fast food ones that you
10 decided not to apply to, are you saying that you
11 haven't seen any other jobs that are worth applying
12 to?

13 A. There are no jobs that I have seen and read through
14 that are worth applying to since then.

15 Q. Have you had any other work other than Tinkergarden
16 since you've been terminated?

17 A. I regularly sell clothing, shoes and accessories
18 online.

19 Q. And how much time does that take out of your day?

20 A. It depends on what part of it I'm doing.

21 Q. Okay. Ballpark, how much -- how many hours a week do
22 you spend selling the clothing and shoes?

23 A. And packing it?

24 Q. And packing it.

25 A. Roughly eight hours a week.

1 Q. And how much time do you spend with Tinkergarden?

2 A. Depends on how many classes I have a week.

3 Q. Ballpark?

4 A. Eight.

5 Q. Okay. How much do you make from the shoe selling and
6 clothing selling?

7 A. Almost \$5,000.

8 Q. And that's \$5,000 over what period of time?

9 A. Since 2020 until now.

10 Q. Why don't you apply for a fast food position?

11 A. They don't pay anything more than 15 or \$16 an hour.

12 Q. Have you had any other training classes since you were
13 terminated?

14 A. No, I have not.

15 Q. Did you receive unemployment benefits?

16 A. I did not.

17 Q. Did you apply for them?

18 A. Not allowed to as an ex-employee of The Salvation
19 Army, from my understanding, because it is a
20 charitable organization.

21 Q. Other than health insurance, what benefits were you
22 enrolled in at the time of your discharge?

23 A. I believe life insurance and the 403(b) retirement
24 plan.

25 Q. Did Salvation Army contribute to the 403(b) or was

1 that totally out of your pocket?

2 A. Salvation Army contributed.

3 Q. How much?

4 A. I cannot tell you off the top of my head.

5 Q. Are you receiving any other kinds of benefits through
6 any government program?

7 A. If the stimulus is considered one of those, we've
8 received stimulus money.

9 Q. Okay. And you said that you didn't apply for Social
10 Security benefits, correct?

11 A. Not that I recall.

12 Q. We made a request, I'm just -- we haven't received
13 them, but it looks like they have some records. I'm
14 not sure what these records are, so I guess we'll see.
15 Did you apply for Medicare benefits?

16 A. No.

17 Q. Where is your health insurance through now?

18 A. My husband's employer.

19 Q. And who's that?

20 A. Dearborn Police Department.

21 Q. Is he a police officer?

22 A. Yes.

23 Q. Have you had any other source of income since your
24 termination other than what you've already told me?

25 A. Odd babysitting jobs and garage sales.

1 Q. And how much do you think you've made from babysitting
2 and garage sales?

3 A. Less than I'd like to say.

4 Q. Approximately?

5 A. Less than \$500.

6 Q. Okay. Other than being treated by -- what's the name
7 of the social worker again at Grosse Pointe?

8 A. The therapist?

9 Q. The therapist.

10 A. The therapist or the psychiatrist?

11 Q. Let me back up. Psychiatrist, is that the one that
12 passed away?

13 A. Yes.

14 Q. And what's the therapist's name?

15 A. Melissa Altamore.

16 Q. And she -- and Melissa Altamore, are you -- you're
17 still seeing her, correct?

18 A. Yes.

19 Q. Are you seeing any other mental health professional at
20 this time?

21 A. No.

22 Q. Other than the Prozac that you told me about, have you
23 taken any other medication for depression or anxiety
24 in the last five years?

25 A. No.

