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N. Qorrolli - Direct

1 time, for six years, being threatened every morning, being
2 called names, being called retarded and being sexually
3 harassed, in a way they changed her for life. She's not
4 anymore who she used to be.

5 Q. How did that make you feel?

6 A. That made me feel heartbroken. My heart aches. I feel
7 like just like when one mirror, you break a mirror and are you
8 going to be able to put that mirror back anymore? You are not
9 going to be able to put that mirror back. Same thing with my
10 daughter. Now, I see, like, she is going to bite her nails all
11 the time, she made a big hole on her septum here in the nose,
12 cartilage. Any time we are going to pass by through that area
13 it is going to remind her what we went through and they are
14 going to go like, Mom, do you remember this? Do you remember
15 that? And even she came to the point, like, she had to seek
16 medical help. And my heart, it takes, because I feel like all
17 the job I been trying to do for all these years to educate my
18 people, I teach them all the time that they have to be good, to
19 be respectful, to be hard worker, they throw in the garbage,
20 they changed her. She's not anymore who she used to be.

21 THE COURT: So, ladies and gentlemen, I have let you
22 hear this testimony and I want to just remind you that should
23 you find in the plaintiff's favor and decide to award damages
24 to the plaintiff, it is for the suffering of the plaintiff and
25 not for the suffering of the mother. But, we will get into

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1 that more later on. Thank you.

2 Counsel.

3 BY MR. HOLZBERG:

4 Q. Ms. Qorrolli, you mentioned that Tesa had some type of
5 issue with the cartilage in her nose?

6 A. Yes.

7 Q. Can you please elaborate what you are talking about?

8 A. I'm talking about unconsciously she used to do all the time
9 this. This. She used to get, like, so scared after she came
10 from upstairs, they called her, and all the time she used to do
11 this, and once even she saw bleeding. When she went to the
12 doctor, they saw that she has -- she perforated her cartilage
13 here. Even she has sometimes now difficult breathing, like
14 when she breathes you can hear her breathing.

15 Q. You also said that at some point Tesa sought medical help?

16 A. Yes.

17 Q. Did Tesa ever talk to you about that?

18 A. Yes.

19 Q. What did she tell you?

20 A. She told me that, mom, I'm not going to be able to take any
21 more of this, I think I'm going to need help. And we decided
22 to go to the doctor and they prescribed her some medication for
23 anxiety because she's getting anxiety, she's getting panic
24 attacks, she's getting very -- so angry, her mood changes right
25 away. She doesn't have anymore energy. I remember after 12

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1 hours working, we came back at home and she didn't want to come
2 anymore downstairs, spend time with our family or have dinner
3 or anything. She used to go straight to her room to sleep.
4 Sometimes I remember once I saw her sleeping with her scrubs on
5 because tomorrow we had to wake up 6:00 -- 7:30 to be at home,
6 from 7:30, 9:00, we came back home, six days. Also, physically
7 tired, exhausted. Hygienist profession, it burns you just like
8 a candle, it burns you. But forget about that physically, but
9 mentally being every day threatened, being sexually abused,
10 seeing my daughter go through that, I don't know what else to
11 do that, how to protect her.

12 MR. WIMS: Objection.

13 THE COURT: Yes.

14 A. I wish if I could --

15 THE COURT: Excuse me. Thank you so much.

16 I'm going to strike the last portion of the witness'
17 answer. I'm going to ask counsel, again if you can be specific
18 in your questions to help guide her in what is relevant
19 testimony.

20 BY MR. HOLZBERG:

21 Q. Ms. Qorrolli, did you ever observe Tesa while she was
22 having a panic attack?

23 A. Yes, I did.

24 Q. And what did you observe when she was having a panic
25 attack?

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1 A. I observed her, like, all shaking which also myself, same
2 thing, I got in the same position all shaking, her heart
3 beating, like moving, didn't know what to do. And imagine
4 after they called us upstairs and coming back in that condition
5 we had to start right away seeing patients.

6 THE COURT: Excuse me. I'm going to strike the
7 answer.

8 The question is when your daughter was having a panic
9 attack, what did you observe, what did that look like to you.

10 THE WITNESS: When she had the panic attack, Tesa, her
11 breathing was so fast, her heart like was so fast, she was
12 shaking, she was getting so pale and, like, I don't know how
13 else should I explain this. And I had to try to calm her down
14 and get her some water.

15 THE COURT: Excuse me, Ms. Qorrolli, you finished your
16 answer. Thank you. Let's wait for the next question.

17 BY MR. HOLZBERG:

18 Q. Ms. Qorrolli, you have said that you noticed that Tesa's
19 emotional state had an impact on your family?

20 A. Yes, it did, very much.

21 Q. How so?

22 THE COURT: No, counsel. I have just given the
23 instruction, you heard it. So, absolutely inquire with respect
24 to the plaintiff.

25 BY MR. HOLZBERG:

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1 Q. Did you observe Tesa crying at work?

2 A. Yes. All the time. Including myself, too.

3 THE COURT: Excuse me. I think the answer was yes.

4 THE WITNESS: Yes.

5 THE COURT: You have added to it briefly. I just want
6 to make sure you listen carefully to the question that's asked.
7 OK? Good.

8 Counsel, next question.

9 BY MR. HOLZBERG:

10 Q. You have said that Tesa has changed due to her employment
11 at Metropolitan Dental Associates, right?

12 MR. WIMS: Objection.

13 THE COURT: Sustained.

14 Q. What, if any impact, did you observe in Tesa's mood as a
15 result of Mario sexually harassing her?

16 MR. WIMS: Objection.

17 THE COURT: Sustained as to form.

18 Q. How would you describe Tesa prior to her working at MDA?

19 A. Tesa always used to be happy, always used to be very
20 loving, always used to be very caring. We used to do things
21 together. She used to go with friends. She used to help me a
22 lot, cooking, especially around the holidays. She was happy,
23 she was full of life. She had energy. Everything.

24 Q. Did there come a point in time where you noticed a change?

25 A. Yes.

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1 Q. And when was that?

2 A. It was after what they start doing to her.

3 MR. WIMS: Objection.

4 THE COURT: Sustained. Stricken.

5 You can ask for a point in time, counsel.

6 BY MR. HOLZBERG:

7 Q. At what point in time do you feel as though Tesa changed in
8 that respect?

9 A. Whether they called her upstairs and she used to come back
10 all crying, all shaking and had to go right away, see next
11 patient. Every day it was same thing and same thing and same
12 thing. This never stopped. So, this, it came to the point,
13 like she start becoming different personality. Now Tesa was
14 crying to me and she keeps saying like, mom, they changed my
15 personality for life -- which they did.

16 MR. HOLZBERG: I have no further questions. Thank
17 you.

18 THE WITNESS: Can I just say one more thing, lastly?

19 THE COURT: No. Thank you.

20 THE WITNESS: Thank you.

21 THE COURT: Thank you very much. You can just stay
22 there though, if you would, to see if other counsel has a
23 question for you.

24 THE WITNESS: OK.

25 THE COURT: Again, just listen with care to the