

WILLIAM KNACK
FELDMAN vs. KNACK

November 16, 2015
200

1 W. Knack

2 Q. And were there telephone calls that
3 you recall one way or the other?

4 A. I can't be sure.

5 Q. There may or may not have been?

6 A. Yes.

7 Q. But there were two that you know
8 about that were recorded; correct?

9 A. I know now that they were recorded.
10 I did not know that at the time.

11 Q. When did you first learn that these
12 two telephone conversations that you had with
13 her were recorded? What were the
14 circumstances of your learning of that?

15 A. I'm not quite sure. I'm a little
16 foggy about it. So what I remember is that I
17 received a telephone call from a Detective
18 Wilson, which later I came to know was after
19 the fact, after these calls had been
20 recorded. I'm not sure if I became aware of
21 the calls, the existence of the calls in a
22 conversation with my attorney at the time,
23 the person who was my attorney at the time,
24 or a little bit later than that.

25 Q. Prior to Detective Wilson calling

1 W. Knack

2 you, had you any knowledge at all that Noelle
3 Feldman was bringing charges or claiming that
4 you had sexually assaulted her?

5 A. No, not at all.

6 Q. That was your first knowledge of
7 it?

8 A. Yes. I actually thought it was a
9 PBA solicitation.

10 Q. What specifically did Detective
11 Wilson tell you when he called you for the
12 first time?

13 A. He asked me if I would come in to
14 the station to speak with him about a
15 patient. And I asked him if he had a release
16 from whoever this patient was. And he said
17 no. And so I told him that I couldn't
18 confirm or deny whether or not somebody was
19 my patient without a release. I couldn't
20 have a conversation with him about it without
21 a release. And I believe I said to him, you
22 know, get a release from whoever it is and,
23 you know, and we'll talk, that kind of thing.

24 Q. He didn't tell you the name of the
25 patient?

1 W. Knack

2 A. I don't --

3 Q. Or did he tell you the name of the
4 patient?

5 A. Not in that first call. There was
6 another call from him.

7 Q. Right.

8 A. You know, where he did say that --

9 Q. So let's stick with the first call.
10 So you've told me every that occurred during
11 the first call, everything that was said?

12 A. Between the police officer and
13 myself.

14 Q. Yes, sir.

15 A. To the best of my recollection,
16 yes.

17 Q. He didn't tell you that there were
18 allegations of sexual misconduct or assault
19 or anything like that with respect to you,
20 did he?

21 A. My recollection is that was the
22 second telephone call.

23 Q. Not the first one?

24 A. I believe so.

25 Q. So would it be fair to say when you

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W. Knack

got off the phone after the first call, you had no idea what he was calling you about, who it was or what they were claiming?

A. No. No. It sounded like something was up, but what, I did not know.

Q. And how much time passed before he called you again?

A. I can't give you an answer that I have confidence in. I don't know if it was a week or two or three.

Q. After the first call did you consult with a lawyer?

A. Not after the first call.

Q. So did you do anything before the second call other than just wait to see if anyone called you again?

A. No, I didn't do anything.

Q. So there came a point when another call came in from Detective Wilson?

A. Yes.

Q. What did he say at this point in time?

A. My recollection is that he said that a former patient of mine, and then he

1 W. Knack
2 named her, Noelle Feldman, had been in and
3 made a complaint against me, and the way he
4 described it was about something that may or
5 may not have happened in my office, would I
6 come in and talk with him.

7 Q. Did he ask you about a release?
8 Did you ask him about a release?

9 A. I asked him about a release. He
10 didn't have a release. And I told him I
11 couldn't speak with him. He seemed unhappy
12 about that, and he said that he would just
13 continue on with his investigation, but
14 without a release, I couldn't talk to him
15 about it. At that point I contacted an
16 attorney.

17 Q. Did you make any efforts to contact
18 Noelle to get a release so you could
19 straighten this situation out with the
20 police?

21 A. No. No.

22 Q. Why not?

23 A. She had gone to the police.
24 Something was up. I wasn't going to have
25 that conversation with her.

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W. Knack

Q. So are you telling us that if this police officer showed you a release, you would have gone in there and talked to him?

A. I probably would have consulted counsel before I went in.

Q. Is that when you hired David Squirrell as your lawyer?

A. Yes.

Q. And did he contact the police department, to your knowledge?

A. I believe he had a few conversations with them.

Q. And did he relate to you the content of the conversations that he had with the police department?

MR. BROPHY: Stop. That's clearly privileged.

Q. Do you know if he spoke to the police department?

MR. BROPHY: I think that's going to -- he already said that he thought he did, so why are we going into it again. You're already intruding on the privilege with that, but maybe that's

1 W. Knack

2 gray. Next question.

3 Q. Did you ever tell the police
4 department that Noelle Feldman had sexually
5 assaulted you?

6 A. No. I had no substantive
7 conversations with the police about the
8 details of the case whatsoever.

9 Q. So is it correct, then, that at
10 that point in time you knew that Noelle
11 Feldman was making a claim, a criminal claim
12 to the police department that you had
13 sexually assaulted and raped her, but you
14 never told them that, in fact, she's the one
15 that assaulted you?

16 MR. BROPHY: Please read back the
17 question, please.

18 Q. Is that correct?

19 MR. BROPHY: Read back the
20 question, please.

21 (Record read.)

22 MR. BROPHY: I'm objecting to this
23 question. You can answer it over my
24 objection. He can answer it over my
25 objection.

1 W. Knack

2 MR. HANNIGAN: Okay. Fine.

3 MR. BROPHY: It's an objectionable
4 question.

5 MR. HANNIGAN: Let him answer.

6 A. I'm still not exactly clear about
7 what you're asking me. The word "rape" never
8 came up. I think that the first time I
9 became aware of that was in becoming aware of
10 the formal complaint where this really kind
11 of vicious brutal assault was described.

12 Q. The civil case you mean?

13 A. Um-hmm.

14 Q. The civil case?

15 A. Yes. Yes. I don't believe that
16 that ever came up. I had received an email
17 from her where she accused me of behaving
18 inappropriately with her. But in that email,
19 which I think was in November, there was no
20 mention of any sexual contact, and certainly
21 the word "rape" was not used. So at worst,
22 what I was suspecting was some allegation
23 that I was being inappropriate.

24 Q. So given what you claim happened in
25 reality, you must have been shocked to hear

1 W. Knack
2 that she was claiming that you did anything
3 inappropriate, improper, or anything like
4 that; correct?

5 A. I wasn't really shocked. I mean
6 it's never a good thing to get a call like
7 that from the police department. But it is
8 completely consistent with her style to blame
9 other people and hold other people
10 accountable for her actions. So it's not
11 shocking or inconsistent with who she is and
12 how she operates.

13 Q. Let me ask it this way. When you
14 learned that Noelle was making a claim that
15 you had been inappropriate with her through
16 the police department, did you tell them that
17 she was the one who was at least
18 inappropriate with you?

19 A. As I had said to you, I did not
20 have a conversation with them at all about
21 her.

22 Q. Did you ask anyone to tell them
23 that on your behalf?

24 A. I'm not sure. I had an attorney,
25 and he made inquiries. I'm imagining that he

1 W. Knack
2 communicated my innocence.

3 MR. HANNIGAN: Let's mark -- oh, we
4 already did mark it, Plaintiff Knack 8.
5 Let's go off the record for a second.
6 Peter wants to plug something in.

7 VIDEOGRAPHER: We are now going off
8 the record at 3:02.

9 (Recess taken from 3:02 p.m. to
10 3:05 p.m.)

11 VIDEOGRAPHER: We are now back on
12 the record at 3:05 p.m.

13 Q. Dr. Knack, so I think you testified
14 that you became aware at some point in time
15 that there were two telephone conversations
16 you had with Noelle that were recorded by the
17 police department?

18 A. Yes.

19 Q. And you weren't aware they were
20 being recorded at the time; is that correct?

21 A. That's correct.

22 Q. And that's correct as to both
23 calls?

24 A. Yes.

25 Q. And if you could look at the copy

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W. Knack
of the transcript of a 6/18/14 telephone call
marked as Exhibit 8. Take this one. This is
the marked one.

MR. BROPHY: Let me see the marked
one, then.

MR. HANNIGAN: Sure.

MR. BROPHY: Thank you.

Q. Let me ask you this, Dr. Knack.
Have you listened to these telephone calls,
the recordings?

A. Once, yes.

Q. And when was that?

A. I think around the time that they
became available to us.

Q. Did you listen to them in
preparation for this deposition?

A. No.

Q. Did you review the transcript of
the telephone calls in preparation for the
deposition?

A. No.

Q. Why don't we play the first
transcript in its entirety. You can follow
along -- the first call in its entirety. You

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W. Knack

can follow along with the transcript so that you have context, and then I'll come back and I want to ask you some specific questions.

MR. HANNIGAN: Is that okay with you, counsel?

MR. BROPHY: Over my objection, go ahead.

MR. HANNIGAN: Do you have some other way you want to do it?

MR. BROPHY: No. I'm objecting to the use of the recording, and I'm objecting to the use of the transcript in examining the witness. But it's a deposition, so you have some latitude.

MR. HANNIGAN: Okay.

MR. BROPHY: We'll deal with what's admissible at a later date.

MR. HANNIGAN: I just wanted to make it clear. I thought you were objecting to the methodology I was using as opposed --

MR. BROPHY: No.

MR. HANNIGAN: -- to the substance.

MR. BROPHY: No. I'm not objecting

1 W. Knack

2 to the methodology.

3 MR. HANNIGAN: Okay.

4 MR. HARRINGTON: And for the
5 record, the CD that we're going to play
6 right now has been marked as Exhibit 7.
7 It contains two clips and a phone call
8 in its entirety. We're now going to
9 play the clip, the call in its entirety.

10 MR. HANNIGAN: Yes, please.

11 MR. BROPHY: The first phone call.

12 MR. HARRINGTON: June 18, 2014,
13 correct. I'm just going to have to get
14 it -- just give me a second. Okay.

15 (The following is transcription by
16 court reporter of recording dated
17 June 18th, 2014:)

18 DETECTIVE WILSON: The date is June
19 18th, 2014. The time is approximately
20 11:38 a.m. I'm in the room, interview
21 room, the detective division. My name
22 is Detective Sergeant James Wilson. I'm
23 in the room with Noelle Feldman. We're
24 about to place a controlled recorded
25 phone call to Dr. William Knack to his

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W. Knack
cell phone, which is (914) 874-3455.
This is regarding case 14-56. Okay.
You can put that in your ear.
DR. KNACK: Hello there.
MS. FELDMAN: Hi.
DR. KNACK: How are you.
MS. FELDMAN: Umm, I'm okay, I
guess.
DR. KNACK: Yeah, I saw your other
missed call. I wasn't sure if that was
just a mistake or if you were actually
reaching out.
MS. FELDMAN: I am reaching out.
DR. KNACK: So tell me a little bit
about what's going on. How're you
doing?
MS. FELDMAN: I'm -- I'm -- well,
good and bad, because -- good because
I've been going to a lot of meetings,
and I have a sponsor, and I'm working on
like my fourth step now for a while.
DR. KNACK: Uh-huh. That fourth
step is usually a hard, uhh, a hard
time.

1 W. Knack

2 MS. FELDMAN: Yeah. It's been
3 really hard for me, especially because
4 like, you know, I -- I don't know. I
5 just -- you know, I really don't want to
6 talk to her about what happened in your
7 office.

8 DR. KNACK: Um-hmm.

9 MS. FELDMAN: But I need some
10 closure.

11 DR. KNACK: Okay. Okay.

12 MS. FELDMAN: And, you know, I just
13 -- I really -- I don't know. I'm having
14 a really hard time with it. I really --
15 you know, I told you at the first
16 session I said I don't think I could
17 ever trust a man.

18 DR. KNACK: Um-hmm.

19 MS. FELDMAN: And I (inaudible).
20 But, you know, I feel like -- like I do
21 feel like you owe me an apology.

22 DR. KNACK: Well, you know, I would
23 like to talk this through with you. I
24 was kind of shocked when I got your
25 letter, you know, and a little

1 W. Knack
2 frightened, too, because I felt like I
3 could trust you, you know. And then
4 there was a -- you know, we talked about
5 a lot of stuff. I mean nothing just
6 happens. There was a lot of discussion
7 about all of this. So I would like to
8 be able to talk it through with you.
9 But, you know, I need to know that
10 you're okay with doing that.

11 MS. FELDMAN: Yeah. I need to work
12 through this. I mean I can't -- I've
13 been a real mess about this.

14 DR. KNACK: Um-hmm.

15 MS. FELDMAN: When you said to me
16 about -- that time you told me like when
17 I was having a really hard time and you
18 said, well, is it because of me, because
19 I feel like a real prick, I mean I've
20 been like a mess about that.

21 DR. KNACK: Okay. So we do need to
22 talk about it. We do need to talk about
23 it. When would you like to do that?

24 MS. FELDMAN: I don't know. I got
25 a doctor's appointment in like a minute.

1 W. Knack

2 DR. KNACK: Uh-huh. Uh-huh. Well,
3 I mean are you saying you want to talk
4 about it on the phone, or do you want to
5 talk about it face to face? I'm not
6 sure, you know, exactly what you -- what
7 you think will be helpful.

8 MS. FELDMAN: Umm, I'm not sure
9 either. Can I call you back? Can I
10 think about it a little bit? I'll call
11 you back.

12 DR. KNACK: You can think about it
13 for as long as you like. I'm going to
14 be going into a meeting and will be tied
15 up for, you know, the afternoon. I
16 believe that I am up in Westchester on
17 Friday.

18 MS. FELDMAN: Uh-huh.

19 DR. KNACK: Honestly, I prefer to
20 not have the conversation over the
21 telephone. But, you know, you think
22 about what you want to do and let me
23 know.

24 MS. FELDMAN: Okay.

25 DR. KNACK: Okay?

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W. Knack

MS. FELDMAN: All right.

DR. KNACK: All right. I am glad that I heard from you. I have been, you know, concerned about this. So I'm glad that you reached out. So we'll deal with this.

MS. FELDMAN: Okay. Great.

DR. KNACK: All right?

MS. FELDMAN: Okay. Thank you.

DR. KNACK: Take care.

MS. FELDMAN: Okay.

DR. KNACK: Bye.

DETECTIVE WILSON: Okay. The phone call is ended. The conversation is closed. I'm turning off the recorder.

BY MR. HANNIGAN:

Q. Dr. Knack, you heard that recording of that first telephone conversation on 6/18/2014?

A. Yes.

Q. And do you recognize your voice as one party to the conversation we just heard?

A. I do.

Q. And do you recognize Noelle Feldman

1 W. Knack

2 as the other party?

3 A. I do.

4 Q. Do you remember having this
5 conversation?

6 A. Yes.

7 Q. And where were you when you had
8 this conversation?

9 A. In Bloomingdale's.

10 Q. You were off shopping and it was on
11 your cell phone?

12 A. Yes.

13 Q. So I assume no one else other than
14 you was listening in on this conversation
15 other than Detective Wilson and Noelle?

16 A. That's correct.

17 MR. HANNIGAN: Peter, if you could
18 just play Clip 1. And then as you're
19 playing it, if I want you to stop, can
20 you?

21 MR. HARRINGTON: Yes.

22 MR. HANNIGAN: All right. Go
23 ahead.

24 MR. HARRINGTON: And for your
25 reference, I think Clip 1 is marked on

1 W. Knack
2 the exhibit, if I'm not mistaken.

3 MR. HANNIGAN: It's Page 1, line
4 18.

5 MR. BROPHY: Then why don't we just
6 use that.

7 MR. HARRINGTON: Yeah. You can
8 start on Page 1, line 18, and you'll
9 know where it's picking up.

10 MR. BROPHY: Okay.

11 (Whereupon Clip 1 was played:)

12 DR. KNACK: So tell me a little bit
13 about what's going on. How're you
14 doing?

15 MS. FELDMAN: I'm -- I'm -- well,
16 good and bad because -- good because
17 I've been going to a lot of meetings and
18 I have a sponsor, and I'm working like
19 on my fourth step now for a while.

20 DR. KNACK: Uh-huh. That fourth
21 step is usually a hard, uhh, a hard
22 time.

23 MS. FELDMAN: Yeah. It really has
24 been, especially because like, you know,
25 I don't -- I don't know. I just, you

1 W. Knack

2 know, I really don't want to talk to her
3 about what happened in your office.

4 BY MR. HANNIGAN:

5 Q. Dr. Knack, do you know who Noelle
6 was referring to when she said that she did
7 not want to talk to her about it, who the
8 "her" was?

9 A. I believe she was referring to a
10 sponsor.

11 Q. An AA sponsor?

12 A. Yes.

13 Q. And what is Step 4? What does that
14 involve?

15 A. Step 4 involves taking a rigorous,
16 honest moral inventory. It's a step that
17 encourages people to look at their own
18 behavior.

19 Q. Do you have to write things out?

20 A. People often do write fourth steps,
21 yes.

22 Q. Why is it particularly difficult as
23 opposed to other steps?

24 A. Well, because it involves taking
25 personal responsibility for yourself and for

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W. Knack

your contribution to whatever it is that might have gone wrong in life. The reason why that was particularly meaningful to me in this telephone call is that if she's working on a fourth step, it suggests that she's examining her role in things. And so the thinking that I was having at the beginning of this call was that she was working this through with a sponsor and approaching taking a look at her role in what had happened in my office and having trouble accepting personal responsibility for it. If that were the case, that would be a very good thing, and it would be a mark of progress on her part.

Q. So when she says here "what happened in your office," you took that to mean this alleged attack by her, the attack you allege happened from her attacking you; is that correct?

A. Yes. Yes. And perhaps more than that. Perhaps many of the behaviors that have been described throughout her treatment experience with me as seductive or even some of the kind of angry assaultive outbursts

1 W. Knack

2 that she had. It was potentially a
3 communication of something very positive.

4 Q. Did you think it had to do with any
5 -- that is, that phrase, "what happened in
6 your office," did you think it had to do with
7 any improper conduct whatsoever on your part?

8 A. No, because that never happened.

9 Q. Where it says here on the next page
10 at line six at Page 2, "I was kind of shocked
11 when I got your letter, umm, you know, and a
12 little frightened, too, because I felt like I
13 could trust you." That's your words; right?

14 A. Yes.

15 Q. What letter were you referring to?

16 A. That email that she had sent
17 accusing me of being inappropriate with her.

18 Q. When did you get that?

19 A. Whatever the date on the email is.
20 I believe it was in November, and this call
21 is many, many months later.

22 Q. When you say "I felt I could trust
23 you," in speaking to Noelle, why did you need
24 to trust her? About what? What had occurred
25 that you needed her to keep a secret?

1 W. Knack

2 MR. BROPHY: Object to the form of
3 the question.

4 MR. HANNIGAN: I'll withdraw it.
5 I'll withdraw it.

6 Q. Why did you need to trust her as
7 the opposed to her trusting you?

8 A. I don't know that I was expressing
9 a need. I think that what I was
10 communicating was that this event had
11 occurred. She was there. She knows that it
12 occurred. I didn't report it. And then
13 somewhere after the fact I get an email from
14 her saying that I've behaved inappropriately.
15 That's the issue that I was addressing. I
16 didn't feel the need to protect myself.

17 Q. And why were you frightened about
18 getting this letter from her? What about it
19 frightened you? You used the word
20 "frightened."

21 A. Well, it was an accusation. It's
22 an accusation of improper, unprofessional
23 conduct. It said nothing about any kind of
24 actual sexual contact. It said nothing about
25 rape. It talked about essentially what I

1 W. Knack
2 would say is sort of behaving like a pig,
3 but, you know, nothing about any actual
4 sexual behavior. It still accused me of
5 behaving inappropriately.

6 (Plaintiff's Knack Exhibit 9,
7 One-page email, marked for
8 identification, as of this date.)

9 Q. Can you take a look at Exhibit 9,
10 please.

11 A. Yes.

12 Q. Is this what you're referring to?

13 A. Yes.

14 Q. I'll read part of it. It says,
15 "To Dr. Knack. I just want you to know that
16 I will not be coming back for therapy anymore
17 with you. I have for a long time known that
18 your sexual acting out with me is absolutely
19 not acceptable. For example, hugs so hard
20 they left bruises, kissing me on the couch,
21 and commenting on my clothes and the body
22 when I come in like 'that's my favorite
23 outfit, t-shirt, jeans, and no makeup' in a
24 sexual voice."

25 You said that there was nothing in

1 W. Knack

2 here about sexual conduct or misconduct on
3 your part. Is that right? What is this?

4 A. I don't remember the exact words
5 that I used. What I intended to communicate
6 was there was no allegation of any rape or
7 sexual intercourse or anything like that.
8 This is clearly inappropriate, and that's
9 what I was frightened about, getting an email
10 like this. But this is not what she reported
11 to the police.

12 Q. And when this first phone call took
13 place that we've been looking at, you didn't
14 think that she was referring to these claims
15 when she was asking you about what happened
16 in your office?

17 A. Because it was couched in the
18 context of her working on the fourth step,
19 no. It sounded, actually, the opposite of
20 this.

21 Q. Did you ever hug her so hard that
22 you may have left bruises?

23 A. No.

24 Q. How about kissing her on the couch?
25 She was kissing you, I gather; right?

1 W. Knack

2 A. I never kissed her on couch. There
3 was that event when she jumped on me that I
4 described for you.

5 Q. Did you ever comment to her on her
6 body?

7 A. No, other than when she was unkempt
8 or particularly disheveled.

9 MR. HANNIGAN: Just give me a
10 second, please.

11 Q. Looking at the transcript again,
12 Page 2, line six, where it says, "I was kind
13 of shocked when I got your letter and, you
14 know, and a little frightened, too, because I
15 felt like I could trust you, you know, and
16 then there was a, you know, we talked about a
17 lot of stuff, I mean nothing -- nothing just
18 happened."

19 What stuff are you referring to
20 that you talked about?

21 A. I believe that I was referring to
22 that last conversation that we had at the end
23 of September when we terminated.

24 Q. And when you say "nothing just
25 happened," I mean what are you referring to

1 W. Knack
2 nothing just happened? Everything happens in
3 context? What did you mean?

4 A. Everything happens for a reason.
5 There's a way to understand what happened.
6 Again, keep in mind, I thought I was getting
7 a telephone call from someone who was asking
8 me for help, who was telling me she had some
9 negative feelings about what had transpired.
10 I know what transpired. When she's healthy,
11 she knows what transpired. It sounded to me
12 like an attempt to deal with something.

13 Q. So when you said "Nothing just
14 happened," would you agree that you're
15 recognizing that something happened?

16 MR. BROPHY: Object to the form of
17 the question. But you can answer it.

18 A. Yes. What happened is what I
19 described.

20 Q. Her --

21 A. Yes.

22 Q. -- attacking you?

23 A. Yes.

24 Q. So her email talks about your
25 engaging in various types of inappropriate

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W. Knack
sexual conduct, and your comments on the
tape, on the call, the first call, have to do
with her having attacked you?

A. Yes.

Q. I see.

MR. HANNIGAN: This is Page 2,
lines 14 to 30.

(Whereupon recording was played:)

MS. FELDMAN: When you said to me
about -- that time you told me like when
I was having a really hard time and you
said, well, is it because of me, because
I feel like a real prick, I mean I've
been like a mess about that.

BY MR. HANNIGAN:

Q. Do you recall saying that to her?

MR. BROPHY: Object to the
question. That's her statement. He
didn't -- there's nothing just played
that he said.

Q. Okay. Let me read it. "When you
said to me about that time you told me like
when I was having a really hard time, you
said, well, is it because of me, because I

1 W. Knack

2 feel like a real prick." Did you say that?

3 A. I don't believe so. I may have
4 said something like that, with the intention
5 of communicating that I would feel bad if she
6 was upset about something that I did or said.
7 I don't know that I said it exactly that way.

8 Q. So later in the conversation, if
9 you look at it, you talked to her about
10 suggesting that you meet face to face.

11 A. Um-hmm.

12 Q. That was your preference. Is that
13 correct?

14 A. Yes.

15 Q. Were you no longer concerned about
16 being vulnerable, like you told us you were
17 before?

18 A. No, I was very concerned about
19 that. And if it wound up going in this
20 direction, I had a couple of thoughts about
21 how we might structure it.

22 Q. Like what?

23 A. If she was still seeing
24 Dr. Shander, one possibility would be for the
25 three of us to meet together. If she had

1 W. Knack

2 some other different treatment personnel
3 involved, then that could be a possibility.

4 Q. Okay. Do you recall whether Noelle
5 ever came to you as part of this fourth step
6 and apologized to you or dealt with her
7 feelings with respect to you or explained any
8 of that to you in the context of this fourth
9 step?

10 A. No. And that actually would be an
11 eighth step issue, several steps ahead of
12 where she would be here.

13 Q. So the fourth step is only her
14 dealing with it herself?

15 A. Right. And the fifth step she
16 takes it to another person, typically a
17 sponsor.

18 MR. HANNIGAN: Can we play the
19 transcript of the second call.

20 THE WITNESS: Can I go to the men's
21 room while you put that together?

22 MR. HANNIGAN: Please.

23 VIDEOGRAPHER: We are now going off
24 the record at 3:35 p.m.

25 (Recess taken from 3:35 p.m. to

1 W. Knack

2 3:41 p.m.)

3 (Plaintiff's Knack Exhibit 10, CD,
4 marked for identification, as of this
5 date.)

6 (Plaintiff's Knack Exhibit 11,
7 Transcript of 7/17/14 Telephone Call,
8 marked for identification, as of this
9 date.)

10 VIDEOGRAPHER: We are now on the
11 record at 3:41 p.m.

12 Q. Dr. Knack, I'm showing you a copy
13 of the transcript that we've prepared with
14 respect to the 7/17/14 telephone call.
15 You've listened to this recording once
16 before?

17 A. Yes.

18 Q. And I intend to ask you a series of
19 questions about certain parts of the
20 transcript of this recording. And I think
21 for context purposes, it's probably better if
22 we play it through from the beginning to end,
23 as we did for the first tape, and then go
24 back and ask questions about it.

25 MR. HANNIGAN: So I would like you

1 W. Knack
2 to play that, please.

3 MR. HARRINGTON: This is a CD
4 marked 10.

5 (The following is transcription by
6 court reporter of recording dated
7 July 17th, 2014:)

8 DETECTIVE WILSON: The date is July
9 17th, 2014. The time is 1:13 p.m. in
10 the afternoon. This is regarding Case
11 14-56. I'm in the room with Ms. Noelle
12 Feldman. She's going to be calling Dr.
13 William Knack on a controlled phone
14 call. She's calling his cell phone
15 number. He has an office in Chappaqua.
16 (914) 874-3455. My name is Detective
17 Sergeant James Wilson. She is now
18 placing the call.

19 DR. KNACK: Hello.

20 MS. FELDMAN: Hi.

21 DR. KNACK: (Inaudible).

22 MS. FELDMAN: Umm, you know, I'm
23 not doing very well.

24 DR. KNACK: No? (Inaudible).

25 MS. FELDMAN: No. The house is

1 W. Knack
2 going to be sold soon, but, umm, I'm not
3 -- I have to move. There's no doubt
4 about it.

5 DR. KNACK: (Inaudible).

6 MS. FELDMAN: I'm seeing Tom, yeah.

7 DR. KNACK: (Inaudible).

8 MS. FELDMAN: No, he's -- yes, he's
9 -- he's great. He really is.

10 DR. KNACK: (Inaudible.)

11 MS. FELDMAN: Yeah. Uhh, well,
12 uhh, umm, I don't know, I just -- you
13 know, I was -- I've never been in love
14 before, as you know. And I am now.

15 DR. KNACK: (Inaudible).

16 MS. FELDMAN: Yeah. He's really
17 amazing, but it -- I guess -- do you
18 remember that time like you said that --
19 when I was doing really badly, you like
20 -- you said if it's because of me, I'd
21 feel like a real prick? Umm, do you
22 feel like that? Because you really hurt
23 me, you know. What you did was wrong,
24 you know. It really was. It was really
25 wrong, and it's really bothering me.

1 W. Knack
2 You almost killed me. I came to you for
3 help. Why did you do it? Why did you
4 do it? I want to know just why. We
5 were together and it was just horrible.
6 It was just -- I mean I feel like you
7 just --

8 DR. KNACK: (Inaudible).

9 MS. FELDMAN: You should feel bad,
10 because you almost killed me.

11 DR. KNACK: (Inaudible).

12 MS. FELDMAN: Of course I'm having
13 a hard time because of it, because I
14 came to you for help.

15 DR. KNACK: (Inaudible).

16 MS. FELDMAN: Because I'm in love
17 for the first time. I told you I've
18 never been in love before and you know
19 that. You know I don't trust men. I
20 told you that the second time we met.

21 DR. KNACK: (Inaudible).

22 MS. FELDMAN: Did you target me
23 exclusively, though? I mean did you
24 target me? I mean like.

25 DR. KNACK: (Inaudible).

1 W. Knack

2 MS. FELDMAN: Okay. Go ahead. I'm
3 sorry.

4 DR. KNACK: (Inaudible).

5 MS. FELDMAN: They were wrong,
6 though. It was wrong. It was wrong.
7 They were wrong.

8 DR. KNACK: (Inaudible).

9 MS. FELDMAN: Of course I was.
10 Okay, okay. Fine.

11 DR. KNACK: (Inaudible).

12 MS. FELDMAN: No. You -- you --
13 you --

14 DR. KNACK: (Inaudible).

15 MS. FELDMAN: Yeah.

16 DR. KNACK: (Inaudible).

17 MS. FELDMAN: But I am angry. I am
18 angry. And appropriately so. And
19 appropriately so, though. I came to you
20 for help. You took advantage of that.
21 You took advantage of it.

22 DR. KNACK: (Inaudible).

23 MS. FELDMAN: Well, that's how I
24 felt.

25 DR. KNACK: (Inaudible).

1 W. Knack

2 MS. FELDMAN: Do you remember that
3 time I tried to tell you -- tried to
4 tell you something like about my sister
5 and I, and you said, I've heard enough.

6 DR. KNACK: (Inaudible).

7 MS. FELDMAN: Yep. Yep.

8 DR. KNACK: (Inaudible).

9 MS. FELDMAN: Umm, I disagree.

10 DR. KNACK: (Inaudible).

11 MS. FELDMAN: Not -- no. That's
12 not really true. That's not really
13 true, actually, because like --

14 DR. KNACK: (Inaudible).

15 MS. FELDMAN: Really? Do you think
16 as a psychologist having sex in your
17 office is appropriate?

18 DR. KNACK: (Inaudible).

19 MS. FELDMAN: You told me -- and
20 when you said that you weren't going --
21 you weren't going to charge me,
22 remember? And I said, I said -- and I
23 looked at you like -- and you said there
24 were no strings attached, because I
25 looked at you like, you know, but -- but

1 W. Knack
2 there were. And like -- like even that
3 first time like when you put my coat and
4 my bag outside the office. Why did you
5 do that? Why? That was so weird. That
6 first time you -- you -- you took my
7 bag, my Chanel bag, my black Chanel bag
8 and my blue trench coat and you placed
9 them outside the door of your office and
10 you came and sat on the sofa with me.
11 Why?

12 DR. KNACK: (Inaudible).

13 MS. FELDMAN: Well, it's a detail I
14 vividly remember. But the bottom line
15 is this, Dr. Knack. Let me just say
16 this, okay. This is the bottom line.
17 You're a psychologist. I'm your
18 patient. I was your patient. You did
19 something bad. You're a bad man. I
20 want you to know that you are a bad man.
21 You are. I have to tell you that. You
22 are a bad man. You took advantage of
23 me. You took advantage of my
24 vulnerability. You took advantage of
25 the fact that -- everything in my letter

1 W. Knack

2 to you. You took advantage of the fact
3 that I have a sexual abuse history. I
4 remember trying to tell you about my
5 brother assault -- sexually assaulting
6 me, and you wanted the details, and I
7 couldn't -- I couldn't articulate them.
8 And you said, oh, come on, we're two
9 adults. You know how callous that was?
10 Does that strike you as callous to say
11 that to someone who is having a hard
12 time articulating something they've
13 never even spoken about before? Do you
14 have no feelings? Do you know how much
15 you fucked me up? You know how much you
16 fucked me up.

17 DR. KNACK: (Inaudible).

18 MS. FELDMAN: You can say anything
19 you like.

20 DR. KNACK: (Inaudible).

21 MS. FELDMAN: Yeah, I want to tell
22 you how I feel, and I want to tell you
23 that you almost killed me.

24 DR. KNACK: (Inaudible).

25 MS. FELDMAN: What was your goal,

1 W. Knack

2 Dr. Knack? What was your goal?

3 DR. KNACK: (Inaudible). It wasn't
4 my intention.

5 MS. FELDMAN: You should feel
6 terrible, though. You should feel
7 terrible. I want you to feel terrible.
8 That's basically, quite frankly, it's
9 one of my goals. I want you to feel
10 terrible. I want you to be sorry for
11 what you did. I want you to tell me
12 you're sorry for what you did. I want
13 to hear you tell me you're sorry for
14 what you did. You took advantage of me,
15 of my vulnerability, of the fact -- of
16 everything. It was wrong. It was
17 wrong. You know, I've done a lot of
18 reading on this since all of this
19 happened, you know, and I know it's
20 called countertransference. You were
21 wrong. You're a psychologist. You're
22 trained to help people. You were
23 supposed to help me, not hurt me. And
24 you hurt me badly.

25 DR. KNACK: So what I'm trying to

1 W. Knack
2 communicate to you is that that would be
3 the last thing that I wanted to have
4 happen. The night that I was wrong,
5 just by virtue of the fact that you've
6 been hurt, clearly I was wrong.

7 MS. FELDMAN: I was vulnerable,
8 though.

9 DR. KNACK: I do -- well, but I
10 felt differently about it at the time,
11 Noelle. We had worked together for
12 quite a while. I developed feelings for
13 you. I let myself act on those
14 feelings. We did have many
15 conversations about it, because I know
16 that this is not something that is
17 supposed to happen. And I guess that,
18 you know, I mean my judgment was wrong.

19 MS. FELDMAN: You hurt me, though.
20 You hurt me.

21 DR. KNACK: And I -- and I am sorry
22 for that. I did not --

23 MS. FELDMAN: You hurt me. Like
24 you left bruises on me, too, by the way.
25 I told you about that. Remember I told

1 W. Knack
2 you? I told you I hurt to sit down.
3 You left bruises -- I mean you bruised
4 me. And you said it's because I want
5 you to remember me. Do you remember
6 that? I had huge -- a huge bruise on my
7 rear end. Huge. Huge. It literally
8 hurt to sit down. I mean how would you
9 feel if someone did that -- if your
10 daughter went to help, to see someone
11 for help, you know what I mean. Like
12 you knew I was messed up, and you took
13 advantage of me. And I'm angry, and I'm
14 hurt.

15 DR. KNACK: I just --

16 MS. FELDMAN: And I need to resolve
17 it. I need to have it resolved.

18 DR. KNACK: I hear -- I hear that
19 you feel that way. That wasn't my
20 intention or my goal. I wasn't sitting
21 there like some predator trying to take
22 advantage of somebody that was
23 vulnerable. I let my own feelings get
24 the better of me. It fucked up my
25 judgment, and I acted in a way that I

1 W. Knack

2 should not have acted.

3 MS. FELDMAN: Yeah. Are you sorry?

4 DR. KNACK: I -- I am sorry.

5 MS. FELDMAN: Well, then you should
6 say you're sorry to me. I want to hear
7 you tell me you're sorry.

8 DR. KNACK: But I said that I'm
9 sorry to you at least four times today.
10 I am sorry for it. I didn't expect you
11 to wind up feeling like this. That may
12 be my fault or my error in judgment.
13 But I was not trying to hurt you. And I
14 felt like -- I felt like that in the
15 main, our time together was valuable and
16 that, you know, I was supportive and
17 helpful to you in getting out of that
18 marriage and then supporting you through
19 the beginning of it. I mean I feel like
20 I cared a great deal, and I let those
21 feelings get the better of me. I made a
22 mistake, and I am sorry about that. I
23 didn't expect you to be feeling this
24 way. I don't want you to be feeling
25 like this. I do feel terrible.

1 W. Knack

2 MS. FELDMAN: Oh, gosh.

3 DR. KNACK: Look, please don't
4 think about this as some kind of a, you
5 know, just taking advantage of you kind
6 of thing, because that is -- that is not
7 what was going on at all.

8 MS. FELDMAN: You did take
9 advantage of me, though. You did.

10 DR. KNACK: It was wrong.

11 MS. FELDMAN: You did. It was
12 wrong. You did. You took advantage of
13 me.

14 DR. KNACK: But that was not --

15 MS. FELDMAN: You know what, I was
16 so vulnerable. I mean, you know, being
17 with Tom, you know, I realized that and
18 I talked to him about it, you know.
19 And, you know, he's very -- he was very
20 understanding and comforting and
21 supportive of me. But being in love is
22 making me feel like -- you know, because
23 you told me you loved your wife. And I
24 said to you, you know, then you should
25 leave me alone, you know. I mean you --

1 W. Knack

2 DR. KNACK: (Inaudible.)

3 MS. FELDMAN: No. No. No. Listen
4 to me. Listen to me. Listen to me.
5 Listen to me.

6 DR. KNACK: Um-hmm.

7 MS. FELDMAN: It was just -- I
8 don't know. I'm having a hard time
9 articulating my feelings right now. I
10 just want you to know that you almost
11 killed me. This almost took me out.

12 DR. KNACK: Well, I am glad that
13 that didn't happen.

14 MS. FELDMAN: But do you -- do you
15 realize you could have killed me?

16 DR. KNACK: It -- it wasn't my
17 intention. It wasn't what I was --

18 MS. FELDMAN: But, you know what, I
19 feel -- you know how I feel? I feel
20 like you used your position, you know,
21 and your psychological -- like your
22 background, you know. You're a
23 professor for god's sakes. I feel like
24 -- I almost feel like you used that to
25 take advantage of me. I do. I really

1 W. Knack
2 do. I feel like -- I mean like you've
3 done this -- like you've done this
4 before. Is that what happened with that
5 girl from three o'clock?

6 DR. KNACK: Hang on a second.
7 Somebody is knocking at the door.
8 (Inaudible). Hello?

9 MS. FELDMAN: Hello.

10 DR. KNACK: Hi. So, look, when you
11 start to go into that I intentionally
12 took advantage of you --

13 MS. FELDMAN: You did.

14 DR. KNACK: Or -- no, no, no. You
15 can tell me that I took advantage of
16 you. You can tell me that you feel like
17 I took advantage of you --

18 MS. FELDMAN: Don't ever -- stop
19 with the rhetoric, Dr. Knack, okay.
20 You're a psychologist. I was your
21 patient. And you took advantage of me.
22 Yes, you absolutely did. Don't try to
23 couch it in phrases that are convenient
24 to you.

25 DR. KNACK: You're not letting me

1 W. Knack

2 speak.

3 MS. FELDMAN: Because I don't like
4 what you're saying, because you're
5 bullshitting me. You're full of
6 bullshit.

7 DR. KNACK: Okay. So if I'm full
8 of bullshit, why are you even bothering
9 to talk to me?

10 MS. FELDMAN: Why am I bothering to
11 talk to you? Because I wanted you to
12 apologize for what you did. I wanted
13 you to apologize for being a
14 psychological -- a psychology professor
15 and a psychologist and for taking
16 advantage of your patient who has a
17 sexual abuse history, okay. I want you
18 to apologize for the humongus bruise I
19 had on my ass, okay. I want you to
20 apologize for everything.

21 DR. KNACK: Let me ask you
22 something, then.

23 MS. FELDMAN: What?

24 DR. KNACK: Have you heard me
25 apologize?

1 W. Knack

2 MS. FELDMAN: Yes, I heard you
3 apologize.

4 DR. KNACK: Okay, so let me repeat
5 myself, because what I feel the worst
6 about in this is your feeling like
7 somebody who cared about you
8 intentionally took advantage of you.

9 MS. FELDMAN: You did, though.
10 That's exactly how I feel. You -- you
11 -- you were supposed to care about me as
12 a psychologist. You weren't supposed to
13 --

14 DR. KNACK: And that was -- and
15 that was my mistake.

16 MS. FELDMAN: It was your mistake.

17 DR. KNACK: I am a psychologist. I
18 am also a person. I am also a human
19 being. And I let my own feelings --

20 MS. FELDMAN: I heard that. You
21 already said that. But you know what,
22 you're weak. You're weak, though. I'm
23 glad you're sorry, though, because it
24 was wrong. What you did to me was
25 really bad. And I'm just telling you

1 W. Knack
2 like it is, how I feel, you know. What
3 you did was bad, and you are -- I think
4 you're a bad man, period. I do. I hate
5 you. Just for the record, I hate you,
6 okay.

7 DR. KNACK: Okay. All right.

8 MS. FELDMAN: And you live with
9 what you did. I hope you feel good
10 about yourself. Good-bye. I can't talk
11 to you anymore. I need to leave.

12 DETECTIVE WILSON: He's off, right?

13 MS. FELDMAN: Um-hmm.

14 DETECTIVE WILSON: Okay. The phone
15 call is ended. It approximately now is
16 1:34. I am turning off the machine.

17 MR. BROPHY: Before any questions
18 are asked concerning this, I would like
19 the record to reflect that this is a
20 seven-page transcript. Approximately
21 the first half of the transcript
22 absolutely nothing that Dr. Knack said
23 in the course of the conversation has
24 been transcribed. The conversation is
25 incomplete on its face. Therefore, it

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W. Knack

cannot be authenticated. The test of the case People against Ely, 68 NY 2nd 520, cannot possibly be satisfied in this case. This conversation cannot be authenticated. It is clearly inadmissible in evidence. And I have a standing objection to any questions of Dr. Knack in regard to this conversation or any parts of it. And having made that statement, over my objection, ask your questions.

Q. Dr. Knack did you listen to the tape recording of the conversation?

A. Yes.

Q. And do you recognize your voice as one of the parties to the conversation?

A. I do.

Q. Do you recognize the other party as being your former patient Noelle Feldman, the plaintiff in this case?

A. Yes.

Q. And do you remember having this conversation?

A. I do.

1 W. Knack

2 Q. Where were you when you had the
3 conversation?

4 A. For the first half of it I was
5 walking between locations at SUNY Old
6 Westbury. For the second half of the
7 conversation I was in my office.

8 MR. HANNIGAN: If you could play
9 Clip 2, please.

10 (Whereupon Clip 2 was played:)

11 MS. FELDMAN: You should feel
12 terrible, though. You should feel
13 terrible. I want you to feel terrible.
14 That's basically, quite frankly, it's
15 one of my goals. I want you to feel
16 terrible. I want you to be sorry for
17 what you did. I want you to tell me
18 you're sorry for what you did. I want
19 to hear you tell me you're sorry for
20 what you did. You took advantage of me,
21 of my vulnerability, of the fact -- of
22 everything. It was wrong. It was
23 wrong. You know, I've done a lot of
24 reading on this since all of this
25 happened, you know, and I know it's

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W. Knack

called countertransference. You were wrong. You're a psychologist. You're trained to help people. You were supposed to help me, not hurt me. And you hurt me badly.

DR. KNACK: So what I'm trying to communicate to you is that that would be the last thing that I wanted to have happen. The night that I was wrong, just by virtue of the fact that you've been hurt, clearly I was wrong.

BY MR. HANNIGAN:

Q. Dr. Knack, my question about that clip is what specifically was in your mind when you said that -- what were you wrong about? What were you referring to specifically?

MR. BROPHY: Note my objection.

You may answer.

THE WITNESS: Okay.

A. So this is a very different telephone call than the first telephone call.

Q. If you can just answer the question, I would appreciate it.

1 W. Knack

2 A. That's what I'm attempting to do.

3 Q. Okay.

4 A. You asked me what was on my mind
5 when I took the call.

6 Q. No. Withdrawn. No, I'm not asking
7 you what was on your mind. I asked you what
8 were you wrong about? You used that word
9 "wrong" on the tape. You said that night I
10 was wrong. What were you specifically wrong
11 about?

12 A. I actually was not specifically
13 wrong about anything.

14 Q. Okay. What were you referring to
15 when you said "That night I was wrong"?

16 A. What I was referring to is what I
17 attempted to start to explain to you. What's
18 different about this call is that there is no
19 acceptance whatsoever of any personal
20 responsibility on her part at all. The whole
21 first half of this conversation was a
22 declaration from her that she is the victim,
23 I behaved badly, she is a mess because of it,
24 and I am now another one in a long list of
25 people who have abused her. That's what the

1 W. Knack
2 whole first part of this conversation is
3 about.

4 The decision that I made in
5 responding to her was an attempt to try to
6 quiet her, calm her, settle her down. In the
7 work that we do that kind of a statement is
8 referred to as a tranquilizing comment or a
9 tranquilizing statement. She is taking no
10 responsibility for herself. She knows what
11 transpired in that room, as I do, too.
12 That's not reflected in here at all. Though
13 I made a decision to use the technique that
14 is used with borderline patients under
15 circumstances like this called entering their
16 delusional world and validating it in an
17 attempt to calm her down.

18 Q. Is that it?

19 A. That is it.

20 Q. When you used the word "night,"
21 n-i-g-h-t, what incident are you referring to
22 there that occurred at night?

23 A. I don't know.

24 Q. You did say that. You heard those
25 words, though, right?

1 W. Knack

2 A. I did.

3 Q. You don't recall?

4 A. I don't.

5 Q. Is that part of entering her
6 delusional world when you used the word
7 "night"?

8 A. I don't know what that refers to.
9 I actually don't believe that I've ever seen
10 her at night.

11 MR. HANNIGAN: Play Clip 3, please.

12 (Whereupon Clip 3 was played:)

13 MS. FELDMAN: I was vulnerable,
14 though.

15 DR. KNACK: I do -- well, but I
16 felt differently about it at the time,
17 Noelle. We had worked together for
18 quite a while. I developed feelings for
19 you. I let myself act on those
20 feelings. We did have many
21 conversations about it, because I know
22 that this is not something that is
23 supposed to happen. And I guess that,
24 you know, I mean my judgment was wrong.

25 MS. FELDMAN: You hurt me, though.

1 W. Knack

2 You hurt me.

3 DR. KNACK: And I -- and I am sorry
4 for that. I did not --

5 MS. FELDMAN: You hurt me.

6 BY MR. HANNIGAN:

7 Q. Okay, Dr. Knack. When you say in
8 this clip that "I developed feelings for you,
9 I let myself act on those feelings," is that
10 part of your entering the delusional world
11 that she's in by making those type of
12 statements?

13 A. That was an effort on my part to
14 validate what she was saying.

15 Q. So your statement to her "I
16 developed feelings for you" was not true?

17 A. That's exactly what she accused me
18 of. I was agreeing with it.

19 Q. But it was not, in fact, true?

20 A. No.

21 Q. And the next statement, "I let
22 myself act on those feelings," again that
23 statement was not, in fact, true; is that
24 correct?

25 A. That's correct.

1 W. Knack

2 Q. That was part of entering this
3 delusional world of hers and participating in
4 it, I gather, for therapeutic purposes?

5 A. The goal was to try to calm her.
6 That was the goal. She started demanding
7 that she wanted an apology. That's all she
8 was going to hear. It is impossible to
9 rationalize or reason with someone who is
10 being unreasonable. So my decision was to
11 just try to quiet her.

12 Q. So you felt you needed to -- in
13 order to calm her, you needed to not only
14 apologize, but you needed to buy into this
15 thing she was saying you did and go so far as
16 to tell her that you developed feelings for
17 her and that you let yourself act on those
18 feelings in addition to being sorry?

19 MR. BROPHY: Note my objection.

20 Q. Is that correct?

21 MR. HARRINGTON: You can answer.

22 THE WITNESS: Oh.

23 A. Yes.

24 Q. And then you said further down, "I
25 know that this is not something that is

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W. Knack

supposed to happen." What were you referring to?

A. I'm not sure that I was even clear about exactly what it was that we were talking about. I know what occurred during that event that I've described for you. The email that she sent was very different from that, right. And what's being said on the phone is even different from that. So I'm hearing at least three different stories and different sets of accusations. And once I made the decision that I wasn't going to challenge it, I was just going to agree, I was going to try to say whatever it is that I needed to say to calm her down and get her off the phone.

Q. So later on in that same paragraph you said, "and I guess that, you know, I mean my judgment was wrong." Was it correct, in fact, that your judgment was wrong?

MR. BROPHY: Note my objection.

A. If you look at the conversation leading up to that, she just spent whatever amount of time it was telling me that my

1 W. Knack
2 judgment was wrong. Again, I was agreeing
3 with her in an attempt to not agitate her
4 further.

5 MR. HANNIGAN: Okay. Play Clip 4,
6 please.

7 (Whereupon Clip 4 was played:)

8 MS. FELDMAN: You hurt me. Like
9 you left bruises on me, too, by the way.
10 I told you about that. Remember I told
11 you? I told you I hurt to sit down.
12 You left bruises -- I mean you bruised
13 me. And you said it's because I want
14 you to remember me. Do you remember
15 that? I had huge -- a huge bruise on my
16 rear end. Huge. Huge. It literally
17 hurt to sit down. I mean how would you
18 feel if someone did that -- if your
19 daughter went to help, to see someone
20 for help, you know what I mean. Like
21 you knew I was messed up, and you took
22 advantage of me. And I'm angry, and I'm
23 hurt.

24 DR. KNACK: I just --

25 MS. FELDMAN: And I need to resolve

1 W. Knack

2 it. I need to have it resolved.

3 DR. KNACK: I hear -- I hear that
4 you feel that way. That wasn't my
5 intention or my goal. I wasn't sitting
6 there like some predator trying to take
7 advantage of somebody that was
8 vulnerable. I let my own feelings get
9 the better of me. It fucked up my
10 judgment, and I acted in a way that I
11 should not have acted.

12 MS. FELDMAN: Yeah. Are you sorry?

13 BY MR. HANNIGAN:

14 Q. Dr. Knack, in this clip again it
15 says, "I let my own feelings get the better
16 of me. It fucked up my judgment, and I acted
17 in a way that I should not have acted."

18 How did you act in a way you should
19 not have acted with respect to your patient,
20 Noelle Feldman?

21 MR. BROPHY: Over my objection, you
22 may answer the question.

23 A. I did not. Again, I was trying to
24 not challenge her, not agitate her any
25 further, and not argue with her.

1 W. Knack

2 Q. So we're still here in this --
3 you're entering into this delusional land of
4 hers, and you felt it necessary not only to
5 apologize, but to tell her again that you let
6 your own feeling get the better of you, and
7 you even went on to say that it fucked up
8 your judgment? You really got into this, I
9 gather, huh?

10 MR. BROPHY: Note my objection.

11 A. If you're going to do it, you need
12 to do it. If you're going to try this
13 strategy, it's in for a penny, in for a
14 pound. Half measures don't work.

15 Q. Can you cite me to any professional
16 text where this entering into the delusional
17 world of the patient is described, the
18 tranquilizer effect that would apply to this
19 situation so I can go read up on this?

20 A. Well --

21 MR. BROPHY: Objection. You can
22 answer.

23 THE WITNESS: Okay.

24 A. First of all, a comment that you've
25 used that phrase many, many more times than I

1 W. Knack
2 have during this deposition. I used it as a
3 partial description for the judgments that
4 I've made. It goes back to some early work
5 by R.D. Laing, a prominent psychiatrist who
6 was known for his work with schizophrenics
7 and other patients who distort reality. The
8 whole notion of tranquilizing comments and
9 interpretations and statements is a generally
10 accepted way of describing a set of
11 therapeutic interventions. They can be
12 summarized at least in the texts by -- and
13 I'm going to have trouble spelling this for
14 you, Modzieriz. I would start with --

15 MR. HARRINGTON: Give it a try to
16 spell it before we get too far.

17 A. M-o-d-z-i-e-r-i-z perhaps,
18 something like that. It's a general
19 introduction to counseling and psychotherapy
20 text. The R.D. Laing text would be I think
21 The Politics of Experience.

22 I guess I would add to that that in
23 many texts written about the treatment of
24 patients that struggle with borderline
25 conditions and borderline personality

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W. Knack
disorders, the need to not confront them when they have a particular delusional belief is kind of well documented, that you don't take that on head on, you only make it worse when you tell someone that something they believe isn't real, they get worse. This was not a person who was my patient at this time. I was not going to have her in treatment to work with this. I really just wanted to calm her and get her off the phone.

Q. Get her off the phone and then whatever happens to her, it's not your problem, essentially?

A. That fact that I cared about her --
MR. BROPHY: Note my objection.

A. The fact that I cared about her has been stated repeatedly. At this point I'm getting these telephone calls from her. I have no idea that these are calls that the police are monitoring. She's calling me asking me for help. All she wants to do is attack me and get an apology from me. So I gave her an apology. Where things go down the road, I don't know. She's not my

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W. Knack

patient. She's not -- I don't know if she's
connected with somebody else therapeutically.
There's not a lot for me to do at that point.

Q. As a professional, and being one
myself, weren't you concerned about admitting
on the telephone to acting inappropriately
with a patient who was accusing you of having
had sex with them in your office?

MR. BROPHY: Objection.

Q. And you went along with it? Didn't
that concern you?

MR. BROPHY: I am objecting.

MR. HANNIGAN: Okay.

MR. BROPHY: You may answer the
question.

THE WITNESS: Okay.

A. If I was thinking about it in
litigious ways, yes, I would be concerned
about it. I wasn't. I was thinking about it
more in terms of what I know about her.
Again, she called asking for help.

Q. She called telling you that she
wanted you to apologize for raping her, and
you agreed that you had raped her.

1 W. Knack

2 MR. BROPHY: No. I'm going to
3 object and I'm going to --

4 MR. HANNIGAN: Withdrawn.

5 MR. BROPHY: -- direct the witness
6 --

7 MR. HANNIGAN: Withdrawn.

8 MR. BROPHY: -- not to answer the
9 question because the word "rape" was
10 never used, and your client admitted she
11 never used the word. It's not in this
12 transcript. The word "sexual
13 intercourse" isn't here either. Get a
14 grip, sir.

15 MR. HANNIGAN: You never asked my
16 client about the rape. That's why she
17 didn't tell you, because you weren't
18 interested at the deposition. You never
19 asked her about the rape. If you had,
20 she would have said, He raped me, and
21 she would have described in detail how
22 he did it. You didn't care to ask.

23 MR. BROPHY: We're talking about
24 this transcript, sir. We're not talking
25 about the deposition.

1 W. Knack

2 MR. HANNIGAN: You brought up the
3 deposition. You bring it up, live with
4 it.

5 Q. Does this technique have a name,
6 this going in there and going along with
7 whatever the patient is saying in order to
8 tranquilize them? Is there some name or
9 method or something that I don't know about?

10 A. It's sometimes referred to as
11 acting as if. It's sometimes described as
12 something called contact functioning where
13 you deal with what the underlying needs of
14 the communication are.

15 Q. Now, I think you just testified
16 that during this telephone conversation you
17 did not consider Noelle Feldman to be your
18 patient during that telephone conversation,
19 or did you?

20 A. No. No. We had terminated months
21 earlier.

22 Q. Well, given that you had terminated
23 months earlier, and she got on the telephone
24 and accused you of all these unprofessional,
25 if not criminal, acts --

1 W. Knack

2 MR. BROPHY: Objection. As far it
3 goes. Objection. As far as it goes.
4 No such accusations appear in this
5 transcript. And the transcript, in any
6 event, is tainted because it's an
7 incomplete transcription of an
8 incomplete recording. So stop. As far
9 as it goes.

10 MR. HARRINGTON: Joe. Joe, the
11 speeches have to stop. They have to
12 stop. That's not the rules, Joe, and
13 you know it. They have to stop. Make
14 your objection as to form and nothing
15 else.

16 MR. BROPHY: Your partner knows the
17 rules, too.

18 MR. HARRINGTON: You're coaching
19 the witness.

20 MR. BROPHY: Your partner know the
21 rules, too --

22 MR. HARRINGTON: Stop it, Joe.

23 MR. BROPHY: -- Mr. Harrington.

24 MR. HARRINGTON: You're coaching
25 the witness. Stop doing it.

1 W. Knack

2 MR. BROPHY: He knows how to ask a
3 question, and he knows what the record
4 of this case is, and he's making stuff
5 up as he goes along.

6 MR. HANNIGAN: Before I was rudely
7 interrupted, could you read back the
8 part of my question that was able to get
9 out of my mouth before he started
10 stumbling on it.

11 (The following record was read:)

12 "QUESTION: Well, given that you
13 had terminated months earlier and she
14 got on the telephone and accused you of
15 all these unprofessional, if not
16 criminal, acts --"

17 Q. Why didn't you just tell her, I
18 don't know what you're talking about, if
19 anything, you attacked me, thank you very
20 much, get another therapist?

21 MR. BROPHY: Objection.

22 Q. Or something along those lines?
23 Why didn't you do that as opposed to
24 admitting, basically admitting that you had
25 exercised bad judgment, had feelings for her,

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W. Knack

all of those things? Why didn't you go the other way?

MR. BROPHY: Objection. You may answer.

A. Because contrary to her assertions, I am not a bad man, and I am not someone who is unconcerned about her. She called asking for help. She was clearly in distress. I responded to that.

MR. HANNIGAN: Play Clip 5, please.
(Whereupon Clip 5 was played:)

MS. FELDMAN: Well, then you should say you're sorry to me. I want to hear you tell me you're sorry.

DR. KNACK: But I said that I'm sorry to you at least four times today. I am sorry for it. I didn't expect you to wind up feeling like this. That may be my fault or my error in judgment. But I was not trying to hurt you. And I felt like -- I felt like that in the main, our time together was valuable and that, you know, I was supportive and helpful to you in getting out of that

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W. Knack

marriage and then supporting you through the beginning of it. I mean I feel like I cared a great deal, and I let those feelings get the better of me. I made a mistake, and I am sorry about that. I didn't expect you to be feeling this way. I don't want you to be feeling like this. I do feel terrible.

BY MR. HANNIGAN:

Q. Dr. Knack, this long quote from you from the transcript where you again make statements about your feelings getting the better of you and that you made a mistake and that you were sorry, is this more reinforcement of this technique, which I don't think we have a name for, but where you go along with whatever the person is saying in order to make them feel calmer?

A. Yes.

MR. BROPHY: Note my objection.

Q. So none of this about your feelings getting away from you and your judgment being wrong and making mistakes, none of that was, in fact, true?

1 W. Knack

2 A. That's correct.

3 Q. Anywhere in this transcript did you
4 -- or in any recollection of anything in the
5 call that may not be in the transcript, did
6 you ever say anything to Noelle along the
7 lines of, look, Noelle, we know what happened
8 in the office, you came after me, it's not
9 like -- I mean I'd like to help you, but
10 you're just not telling the truth? Anything
11 like that?

12 MR. BROPHY: Note my objection.

13 You may answer.

14 A. In the beginning of the telephone
15 call I made some soft attempts to approach
16 that. It was clear to me that this was a
17 different call than the first call where I
18 had this notion that she was working on a
19 fourth step and looking to take
20 responsibility for her part. This sounded
21 very different in the beginning of this call.
22 And so there were some kind of soft attempts
23 to push things over toward her side. They
24 weren't met with any kind of receptivity
25 whatsoever.

1 W. Knack

2 Q. So you're telling us that the parts
3 of the conversation where you made some soft
4 attempts to, as you say, push things over to
5 her side were only in the parts of the
6 conversation that were not recorded by the
7 recording device being used, and in the
8 portions that were recorded you were taking
9 the blame or admitting that your judgment was
10 bad; is that right?

11 MR. BROPHY: Note my objection.

12 You may answer.

13 Q. Is that a proper characterization?

14 A. It's a -- it's a timing kind of
15 thing. The conversation began here and it
16 ended there. And in the course of it that's
17 where it went. So by the time we got to that
18 part of the conversation where, you know, my
19 voice came through, I had made that decision.
20 I did not start there, but it seemed like
21 that was the way to go.

22 Q. It's kind of tough to buy that one,
23 but it's not for me to say.

24 A. Um-hmm.

25 MR. HANNIGAN: I'm just about done.

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W. Knack

Just let me take five minutes and talk to Peter and we'll be done.

MR. BROPHY: Sure.

VIDEOGRAPHER: We are going off the record at 4:31 p.m.

(Recess taken from 4:31 p.m. to 4:41 p.m.)

VIDEOGRAPHER: We are now back on the record at 4:41.

MR. HANNIGAN: Could you play Clip 6, please, Peter.

(Whereupon Clip 6 was played:)

DR. KNACK: Look, please don't think about this as some kind of a, you know, just taking advantage of you kind of thing, because that is -- that is not what was going on at all.

MS. FELDMAN: You did take advantage of me, though. You did.

DR. KNACK: It was wrong.

BY MR. HANNIGAN:

Q. Dr. Knack, in this Clip 6 you say, "Please don't think about this as some kind of a, you know, just taking advantage of you

1 W. Knack
2 kind of thing, because that is -- that is not
3 what was going on at all."

4 Now, in that particular statement
5 are we in the world of delusion, or are you
6 trying now to tell her, well, it really -- I
7 really wasn't taking advantage of you when
8 before you said you did?

9 MR. BROPHY: Objection.

10 Q. Where are we in this statement?

11 MR. BROPHY: I'm objecting. And
12 you can answer the question.

13 MR. HANNIGAN: Thank you.

14 A. I really was just trying to calm
15 her.

16 Q. Well, was that sentence, was that
17 statement part of the delusion world or not?

18 MR. BROPHY: What statement are we
19 talking about now?

20 MR. HANNIGAN: Line 23, page 5.

21 23, 24.

22 MR. BROPHY: Over my objection, you
23 can answer the question.

24 THE WITNESS: 23, 24?

25 MR. BROPHY: This is what he's -- I

1 W. Knack

2 think this is what he's --

3 Q. "Please don't think about this" --

4 A. Oh.

5 Q. -- "as some kind of a, you know,
6 just taking advantage of you kind of thing."

7 A. That, again, was intended as a
8 statement to calm her.

9 MR. HANNIGAN: Now if we could go
10 to Clip 8, if you could play that,
11 Peter, please.

12 (Whereupon Clip 8 was played:)

13 DR. KNACK: So, look, when you
14 start to go into that I intentionally
15 took advantage of you --

16 MS. FELDMAN: You did.

17 DR. KNACK: Or -- no, no, no. You
18 can tell me that I took advantage of
19 you. You can tell me that you feel like
20 I took advantage of you --

21 MS. FELDMAN: Don't ever -- stop
22 with the rhetoric, Dr. Knack, okay.
23 You're a psychologist. I was your
24 patient. And you took advantage of me.
25 Yes, you absolutely did. Don't try to

1 W. Knack
2 couch it in phrases that are convenient
3 to you.

4 DR. KNACK: You're not letting me
5 speak.

6 MS. FELDMAN: Because I don't like
7 what you're saying, because you're
8 bullshitting me. You're full of
9 bullshit.

10 DR. KNACK: Okay. So if I'm full
11 of bullshit, why are you even bothering
12 to talk to me?

13 MS. FELDMAN: Why am I bothering to
14 talk to you? Because I wanted you to
15 apologize for what you did. I wanted
16 you to apologize for being a
17 psychological -- a psychology professor
18 and a psychologist and for taking
19 advantage of your patient who has a
20 sexual abuse history, okay. I want you
21 to apologize for the humongus bruise I
22 had on my ass, okay. I want you to
23 apologize for everything.

24 DR. KNACK: Let me ask you
25 something, then.

1 W. Knack

2 MS. FELDMAN: What?

3 DR. KNACK: Have you heard me
4 apologize?

5 MS. FELDMAN: Yes, I heard you
6 apologize.

7 DR. KNACK: Okay, so let me repeat
8 myself, because what I feel the worst
9 about in this is your feeling like
10 somebody who cared about you
11 intentionally took advantage of you.

12 MS. FELDMAN: You did, though.
13 That's exactly how I feel. You -- you
14 -- you were supposed to care about me
15 as a psychologist. You weren't supposed
16 to --

17 DR. KNACK: And that was -- and
18 that was my mistake.

19 MS. FELDMAN: It was your mistake.

20 DR. KNACK: I am a psychologist. I
21 am also a person. I am also a human
22 being. And I let my own feelings --

23 MS. FELDMAN: I heard that. You
24 already said that. But you know what,
25 you're weak. You're weak.

1 W. Knack

2 BY MR. HANNIGAN:

3 Q. Dr. Knack, at Page 7, line 13 where
4 you said -- well, starting at line nine, she
5 said, "You did, though. That's exactly how I
6 feel. You -- you -- you were supposed to
7 care about me as a psychologist. You weren't
8 supposed to." And you said "And that was --
9 that was my mistake." She said, "That was
10 your mistake." And you said, "I am a
11 psychologist. I am also a person. I am a
12 human being and I let my feelings," dash
13 dash.

14 I gather again here when you tell
15 her you're a person and that you're a human
16 being and you let your feelings go, that that
17 is part of this, uhh --

18 MR. HARRINGTON: Entering the
19 delusion.

20 Q. Entering into the delusion world in
21 order to tranquilize her?

22 MR. BROPHY: Note my objection.

23 Q. Is that fair to say?

24 A. If you hear the whole clip that you
25 just played for me, it's actually a perfect

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W. Knack

example of what happens when you try to deal with the truth with her. I made an attempt in the beginning to try to talk with her about what really happened. All she does is get more agitated and more upset. I backed off of it and went back to that strategy.

Q. Show me specifically in that clip where you, as you say, tried to talk to her about what really happened, which I assume you mean she attacked you. Where is that?

MR. BROPHY: Note my objection.

A. Bring me to where that clip started.

Q. Page 6, line 17.

A. So I begin to talk with her to challenge ever so slightly that I took advantage of her.

Q. What line was that where you do that?

A. Line 17.

Q. Where it says, "Hi. So, look, umm, when you start to go into that I intentionally took advantage of you" --

A. Right.

1 W. Knack

2 Q. -- she interrupts you and says "You
3 did."

4 A. She jumps right in to "You did."

5 Q. Right.

6 A. She's having -- she's having none
7 of that.

8 Q. Well, you just confirmed --

9 A. She has none of that.

10 Q. -- it throughout the tape that you
11 did; right? Haven't you --

12 MR. BROPHY: Objection.

13 Q. -- repeatedly agreed with her that
14 that happened? Is that right?

15 A. Yes, I did.

16 Q. Yes. So what is she supposed to
17 do? Now she should listen to you when you've
18 already told her, yeah, I did it, my
19 judgment, everything else ran away with me?

20 A. So I made an --

21 MR. BROPHY: Objection.

22 A. -- attempt. It failed. I went
23 back to doing what I had been doing
24 throughout the second half of that
25 conversation.

1 W. Knack

2 Q. This tranquilizing delusional
3 therapy, or maybe that's not the right word,
4 this attempt you made to tranquilize her by
5 agreeing and admitting to various things that
6 we've discussed at length, does this
7 methodology have any limits? I mean, for
8 example, if she had said to you on the tape,
9 Dr. Knack, remember you also sexually abused
10 my daughter over and over again and I want
11 you to apologize for that, too, would you
12 have copped to that, would you have agreed to
13 that and went along with it and said, yeah, I
14 know, I was attracted to her, too, my
15 feelings got away from me --

16 MR. BROPHY: Objection.

17 Q. -- as part of this methodology?

18 MR. BROPHY: Objection.

19 A. I was dealing with what was being
20 presented to me. That wasn't presented to
21 me. Obviously at some point there would be
22 some limit to it, particularly if it was
23 ineffective. In this case it wasn't working.
24 The conversation ended. She didn't get
25 calmer.

1 W. Knack

2 Q. If she was in the same state of
3 calmness as you perceived her to be, or lack
4 of calmness, and she had made those
5 statements to you about her daughter, do you
6 think you would have gone along with that and
7 said, yes, my feelings got away from me with
8 respect to her, too?

9 MR. BROPHY: Objection.

10 A. I think that that would have gotten
11 too far afield of the interaction that took
12 place between us. That would have been
13 another level of delusion if she began to
14 include other people.

15 Q. And you wouldn't have gone there?

16 A. I don't believe so, no.

17 MR. HANNIGAN: Hold on a second.

18 Just give me a second.

19 I have no questions at this time.

20 MR. BROPHY: I just have one

21 question.

22 EXAMINATION BY

23 MR. BROPHY:

24 Q. If Noelle Feldman had ever accused
25 you of forcibly raping her in the course of a

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W. Knack
conversation, would you have agreed to that?

A. No.

MR. BROPHY: That's all.

MR. HARRINGTON: The line's there,
then. The rape line, that's the line,
where she says rape. Okay. Is that
your testimony?

THE WITNESS: Yes.

MR. HARRINGTON: Yes.

MR. HANNIGAN: All right. Thank
you. We're done.

MR. BROPHY: Okay.

(Continued on next page to include
jurat.)

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W. Knack

VIDEOGRAPHER: We are now going off
the record at 4:50 p.m. This concludes
the deposition of William Knack.

(Time noted: 4:50 p.m.)



WILLIAM KNACK

Subscribed and sworn to before me
this 14 day of May, 2016



JOSEPH J. BROPHY
Notary Public, State of New York
No. 028R5007305
Qualified in Westchester County
Commission Expires January 25, 2019

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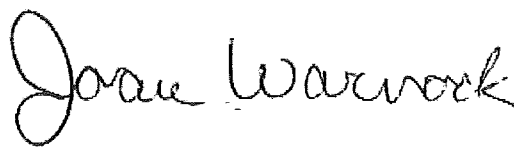
COUNTY OF WESTCHESTER)

I, JOAN WARNOCK, a Notary Public
within and for the State of New York, do
hereby certify:

That WILLIAM KNACK, the witness
whose deposition is hereinbefore set
forth, was duly sworn by me and that
such deposition is a true record of the
testimony given by the witness.

I further certify that I am not
related to any of the parties to this
action by blood or marriage, and that I
am in no way interested in the outcome
of this matter.

IN WITNESS WHEREOF, I have hereunto
set my hand this 28th day of November,
2015.



JOAN WARNOCK

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----- I N D E X -----

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----- EXHIBITS -----

PLAINTIFF'S FOR ID.

(Retained by Bleakley Platt)

EXHIBIT 5 89

Rules of the Board of Regents, Part
29, Unprofessional Conduct,
Effective October 5, 2011

EXHIBIT 6 112

Progress Notes

EXHIBIT 7 184

CD

EXHIBIT 8 184



1		
2	Transcript of 6/18/14 telephone	
3	call	
4	EXHIBIT 9	224
5	One-page email	
6	EXHIBIT 10	231
7	CD	
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9	Transcript of 7/17/14 Telephone	
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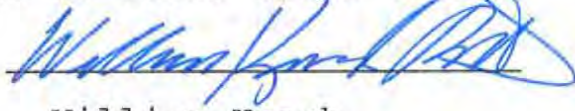
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DEPOSITION ERRATA SHEET

Our Assignment No.: 241482
Case Caption: Noelle Feldman v. William
Knack

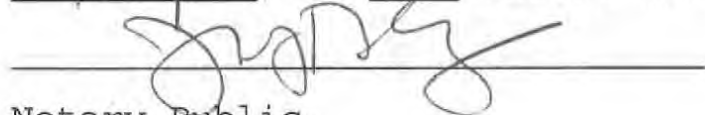
DECLARATION UNDER PENALTY OF PERJURY

I declare under penalty of perjury
that I have read the entire transcript of my
Deposition taken in the captioned matter or
the same has been read to me, and the same is
true and accurate, save and except for
changes and/or corrections, if any, as
indicated by me on the DEPOSITION ERRATA
SHEET hereof, with the understanding that I
offer these changes as if still under oath.



William Knack

Subscribed and sworn to on the 14 day of
May, 20 16 before me.



Notary Public,
in and for the State of

JOSEPH J. BROPHY
Notary Public
No. 02BR500730
Qualified in Westchester
Commission Expires January 19

JOSEPH J. BROPHY
Notary Public, State of New York
No. 02BR500730
Qualified in Westchester
Commission Expires January 19

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DEPOSITION ERRATA SHEET

Page No. 138 Line No. 14 Change to: Swelling
a battli

Reason for change: Homonymy

Page No. 168 Line No. 18 Change to: push

Reason for change: Repetition error

Page No. Line No. Change to:

Reason for change:

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SIGNATURE: William Knack DATE: 5/14/16

William Knack

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