

# **EXHIBIT A**

QAISER CHAUDHARY  
Gilead Sciences vs City Plus Care Pharmacy

May 15, 2025  
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UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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GILEAD SCIENCES, INC. And  
GILEAD SCIENCES IRELAND UC,

Plaintiffs,

vs. Case No. 25-cv-1469 (RER) (RML)

CITY PLUS CARE PHARMACY INC.  
D/B/A HEAL THE WORLD PHARMACY;  
NABILA CHAUDHARY; QAISER  
CHAUDHARY; and HAMZA CHAUDHARY,

Defendants.  
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VIDEOTAPED DEPOSITION OF QAISER CHAUDHARY

New York, New York

Thursday, May 15, 2025

Reported by:

Yaffa Kaplan

JOB NO. 12870155

1 Q. Chaudhary

2 Q. Then the next line down, you took out  
3 another \$5,000 in cash?

4 A. 5,000, I know.

5 Q. What was that for?

6 A. For personal use.

7 Q. What personal use?

8 A. Probably, like -- yes. Personal use for  
9 living stuff. I didn't have money.

10 Q. What living stuff?

11 A. Buying groceries. Buying grocery and  
12 whatever stuff, you know.

13 Q. You spent \$5,000 on grocery?

14 A. No, not one time. So I could have the  
15 money, but 366 -- I don't remember this one. The  
16 check purchases, I don't know.

17 Q. Do you normally buy your groceries in  
18 cash?

19 A. Yes.

20 Q. Do you normally take out \$5,000 at a  
21 time?

22 A. Yes.

23 Q. That's an average withdrawal for you?

24 MR. MODAFFERI: Objection.

25 You can answer.

1 Q. Chaudhary

2 A. Yes.

3 Q. How long does that \$5,000 last you in  
4 grocery?

5 A. Maybe two weeks, three weeks.

6 Q. You are spending \$2,500 in groceries per  
7 week?

8 A. Not only grocery. Maybe pay gas. If  
9 Hamza needs the money, I pay money. Give money to  
10 him. I give money to my wife. Not only gas and  
11 groceries. Not only do we buy two bread and a  
12 sandwich. A pizza, no. I don't run the  
13 pharmacy -- I mean, run to the bank. "Oh, let's go  
14 to the bank, get ten dollars." No, not like that.

15 Q. So this \$5,000 is just for miscellaneous  
16 living expenses?

17 A. Yes.

18 Q. Then looking down, you can see that  
19 there is an -- it says on April 8 --

20 A. Yes.

21 Q. -- there is a line that says, "ACH  
22 electronic debit drug package payment for  
23 \$1,204.38."

24 Do you see that?

25 A. "Electronic debit drug purchase"? No.

1 Q. Chaudhary

2 This is definitely an error.

3 Q. That is an error?

4 A. Yes. First one, 3,661 and 1,204 drug  
5 purchase. What drug purchase?

6 Q. That's what I want to know.

7 A. No.

8 Q. Your testimony sitting here today is  
9 that those are errors?

10 A. Yes. One second. "Electronic debit  
11 drug purchase"? No. I have to check with my bank  
12 who took this money.

13 Q. Okay. Then below that, you can see  
14 there is an outgoing domestic wire transfer.

15 A. Yes. Kinray.

16 Q. Let me just finish the question.  
17 That's for 11,230.64, right?

18 A. Yes.

19 Q. And that's for Kinray?

20 A. Yes.

21 Q. And how did you know to make that  
22 purchase? How did you know to send that money to  
23 Kinray?

24 A. Hamza told me.

25 Q. Hamza told you.

1 Q. Chaudhary

2 When you say "Kinray," Kinray is the  
3 same as Cardinal, right? Is Kinray the same as  
4 Cardinal?

5 A. Yes.

6 Q. And it's a drug wholesaler, right?

7 A. Yes.

8 Q. And these were for Heal the World's  
9 purchases; is that right?

10 A. Yes.

11 Q. Do you know what drugs were purchased  
12 with this money?

13 A. From this check?

14 Q. From the \$11,230.

15 A. No.

16 Q. Then on April 11, you withdrew \$1,000 in  
17 cash. You can see from a pharmacy -- from an ATM  
18 in the Bronx?

19 A. Yes.

20 Q. What was that for?

21 A. For personal use.

22 Q. Had you already spent the \$5,000?

23 A. Yes, maybe.

24 Q. So in five days, you spent \$5,000; is  
25 that right?

1 Q. Chaudhary

2 A. Yes. Gave it to my son. Gave to my  
3 wife so we have money to use it.

4 Q. Did you understand then the \$32,700 was  
5 transferred to your account -- that it would be for  
6 living expenses during this lawsuit?

7 A. No. The money goes to the pharmacy.

8 Q. Okay. But this money that you are  
9 withdrawing came from the \$32,700 balance, right?

10 A. No, but I had my own money, too, there.

11 Q. Is your testimony that there was money  
12 in the Citibank account when the \$32,700 was  
13 transferred to it?

14 A. Say again.

15 Q. Is it your testimony that there was  
16 money in the Citibank account when the \$32,700 from  
17 the pharmacy were transferred to it?

18 A. Yes, because the lawyer told me, "You  
19 have no option. We are going to unfreeze only one  
20 account." That's why.

21 Q. Right. And is it your testimony that  
22 there was already some money in that account?

23 A. Yes. 2,700, \$2,300 already was there.  
24 They freeze, so, therefore, they unfreeze only one  
25 account.

1 Q. Chaudhary

2 Q. So this \$5,000, some of that is the  
3 pharmacy's money, right?

4 A. 32- -- yes.

5 Q. Because you are telling me that you had  
6 \$2,300 of your own money in there and you taking  
7 out \$5,000. So some of that money came from the  
8 32,000, right?

9 A. Say again.

10 Q. Some of the money that you took out from  
11 this account in cash came from the pharmacy's bank  
12 account, right?

13 A. Yes.

14 Q. Okay.

15 A. No, I didn't take any pharmacy money.  
16 Not even a penny.

17 Q. Okay. You understand that \$32,700 was  
18 transferred from the pharmacy's account to your  
19 account -- right? -- and you were making  
20 withdrawals during this period for \$5,000, \$3,000,  
21 \$1,000?

22 A. No. I didn't take 3. Where did I  
23 withdraw 3,000?

24 Q. Right above the 5,000.

25 A. Yes. That I got, yes.

1 Q. Chaudhary

2 Q. So some of these withdrawals were from  
3 the pharmacy's money, right?

4 A. This is -- must be some -- I don't know.  
5 Not me. That's for sure.

6 Q. Okay.

7 A. 3,661? Not me. And they say 1,204. I  
8 have to check with the bank who took this money.

9 Q. And the 5,000 on April 11, that was you?

10 A. Yes.

11 Q. And that money came from the \$32,700  
12 that was transferred from the pharmacy to you,  
13 right?

14 A. Yes. Then I put it back. At the time,  
15 I didn't have money, so I borrowed money from  
16 friends. So I put it back.

17 Q. You put it back?

18 A. Yes.

19 Q. So you had money coming from friends  
20 during this period?

21 A. Yes.

22 Q. How much money did you borrow from  
23 friends?

24 A. Oh, a lot of money.

25 Q. How much?

1 Q. Chaudhary

2 A. Yes. I borrow for him -- I give 20,000.  
3 So that I borrow. And for the personal living,  
4 about \$15,000 borrow from friends. Yes.

5 Q. Do you have a record of that written  
6 down anywhere? Did you keep a record of what you  
7 borrowed anywhere?

8 A. No, I don't keep a record, but I  
9 remember my brothers, my sisters.

10 Q. Let's go back to the bank statement.  
11 Looking at April 14, there is a \$500 withdrawal --  
12 do you see that? -- in cash?

13 A. Yes.

14 Q. What's that money for?

15 A. Yes, for the personal use.

16 Q. That's also for personal use?

17 A. Yes.

18 Q. What about the thousand dollars below  
19 that?

20 A. Yes, personal use.

21 Q. Okay.

22 A. When I -- yes. When I borrow the money.  
23 So I put back \$7,000.

24 Q. When did you put back \$7,000?

25 A. After a few days. Maybe after one week.

1 Q. Chaudhary

2 One week.

3 Q. So you took -- where is the \$7,000?

4 Where is that coming from?

5 A. From friends.

6 Q. Where does that number -- you borrowed  
7 more than \$7,000 from friends?

8 A. Yes. I borrow definitely more, but  
9 however -- whatever is difference from here,  
10 32,700 -- about 25,000 or \$26,000 goes to the  
11 Kinray and the rent -- the rent. Whatever the  
12 balance, which I withdraw before because I need it,  
13 then I put it back. Whatever the difference. So  
14 32- -- okay. Can you calculate that, 32,700 minus  
15 26,000?

16 MR. MODAFFERI: I think she is asking  
17 how you gave it back.

18 A. By check.

19 Q. You were writing checks from this  
20 account to people? You were writing checks from  
21 this account to people?

22 A. I gave a check to Shumaila.

23 Q. And to anyone else?

24 A. That I don't remember, but I remember I  
25 gave to Shumaila 7,000 plus.

1 Q. Chaudhary

2 Q. Was Shumaila one of the friends you  
3 borrowed money from?

4 A. Shumaila, no. My family. My brother,  
5 my sister.

6 Q. So why were you paying Shumaila \$7,000?

7 A. That's a good question. \$32,700. For  
8 the pharmacy money. The money, which I gave to  
9 Kinray and the rent -- whatever the balance, I gave  
10 her.

11 Q. Okay. So here is where I am confused.  
12 The numbers don't add up. You told me that there  
13 was maybe \$2,000 in this account at the time that  
14 the 32,00 was transferred into it, right?

15 A. 2,700.

16 Q. There was \$2,700 in this account that --  
17 at the time the \$32,700 was transferred into it,  
18 right?

19 A. Yes.

20 Q. Okay. You spent -- you withdrew --  
21 looking at this, you withdrew \$10,000 -- 10,711 for  
22 one payment to Kinray, right?

23 A. Yes.

24 Q. You withdrew \$11,230 for another payment  
25 to Kinray?

1 Q. Chaudhary

2 A. Right.

3 Q. So now we are at about \$22,000,  
4 lowballing it?

5 A. Yes.

6 Q. And we were about 35,000 in the account  
7 total. You are taking out \$5,000, \$3,000, \$1,000?

8 A. Where are you looking?

9 Q. I am looking at April 7.

10 A. Oh, yes. This one -- 3,661. That's the  
11 rent.

12 Q. That's the rent?

13 A. Yes.

14 Q. Who did you pay the rent to?

15 A. Baisley -- whatever you mentioned  
16 before. Baisley 161.

17 Q. Did you pay it in cash?

18 A. No. Wire -- no. This I made -- one  
19 second. The bank check.

20 Q. You made it in a bank check?

21 A. Yes.

22 Q. And who asked you to make that payment?

23 A. Shumaila told Hamza. Hamza told me.

24 Q. So you took some of the money that was  
25 in the account you used for personal use. You used

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Q. Chaudhary

5,000, 1,000, 1,000; that's right?

A. Yes.

Q. And then on April 28, you made a deposit for \$500.

Do you see that?

A. Yes.

Q. What was that deposit from?

A. Which money -- which extra money I took from the account. No. This is my account, right?

Q. This is the Citibank account.

A. Citibank, yes. This I deposited in my account.

Q. This is money you had taken out previously. You put it back in.

A. This is my account. I don't understand your question. I put money. I borrowed money. I put money in my account, and I borrowed money. I put more money in my account. Then I give a check to Shumaila.

Q. Then you wrote a check for Shumaila?

A. Yes.

Q. Where did the \$500 that you put in the account come from?

A. From friends. Brothers, sisters.

1 Q. Chaudhary

2 Q. Okay.

3 MR. MODAFFERI: I think we have about 20  
4 minutes left.

5 MS. BLUM: We are almost done. I  
6 promise.

7 Q. So let's look at some more recent  
8 statements. This is just the last couple of days.

9 MS. BLUM: This is Exhibit 20.

10 (Qaiser Exhibit 20, Bank statements,  
11 marked for identification as of this date.)

12 Q. There is a deposit on May 6 for \$8,400.  
13 Do you see that?

14 A. Yes.

15 Q. And you recognize this is the most  
16 recent transaction activity for your Citibank  
17 account, right?

18 A. This was, yes.

19 Q. What was the deposit for the 8,400?  
20 Where did that come from?

21 A. 5/6/2025.

22 Q. Where did that money for that May 6  
23 deposit come from?

24 A. 8,400. May 6, 2025. But this time --  
25 no. But this time, the account was freezed (sic).

1 Q. Chaudhary

2 Q. No, this is the unfrozen account.

3 A. Oh, unfrozen account?

4 Q. Where did the \$8,400 come from?

5 A. Gotcha. This is the money that I  
6 deposit in my account to cover -- this is borrowed  
7 from friends. So then from here, I wrote 7,000  
8 plus check. Whatever the exact amount, I gave to  
9 Shumalia. So she took it.

10 Q. So the \$8,400, your testimony is you  
11 borrowed that from friends?

12 A. Yes.

13 Q. That \$7,026.30 check, that's what you  
14 wrote to Shumalia?

15 A. This goes to Shumalia.

16 Q. And on May 12, you took out \$1,000.  
17 Do you see that?

18 A. Yes.

19 Q. What was that \$1,000 for?

20 A. Personal use.

21 Q. Personal use? You mean personal living  
22 expenses?

23 A. Yes. Yes. This money, I deposit. And  
24 7,026, I gave to Shumalia. This is Shumalia.

25 Q. Do you have a bank account in Pakistan?

1 Q. Chaudhary

2 A. Yes.

3 Q. That account is unfrozen, right? You  
4 have a bank account in Pakistan that's not  
5 currently frozen, right?

6 A. No.

7 Q. No, you don't have an account?

8 A. I have account.

9 Q. And it's not frozen, right?

10 A. No.

11 Q. How much is in that account?

12 A. I don't remember. I have to check the  
13 record. I don't know.

14 Q. Do you transfer money from your account  
15 in Pakistan to the United States?

16 A. Yes.

17 Q. Why do you transfer money over?

18 A. Because I need money over here. Not  
19 need money. I mean, as a matter of fact, I have no  
20 nobody over there because my family -- because my  
21 children don't want to go there. So I want to  
22 bring whatever I have over there. I want to bring  
23 it back to here.

24 Q. Where does the money you have in the  
25 account in Pakistan come from?

1 Q. Chaudhary

2 A. I have land over there, property over  
3 there, but the property came from my parents. And  
4 I sold it.

5 Q. Is there any other sources of the money  
6 in your account in Pakistan?

7 A. Yes. I received some rent, you know,  
8 yes.

9 Q. Some rent from property you own in  
10 Pakistan?

11 A. Yes.

12 Q. Do you still own that property?

13 A. Yes.

14 Q. And you are just transferring money over  
15 as you need it for living expenses; is that right?  
16 If I were to walk you through all your transfers,  
17 you would tell me they were all for living  
18 expenses?

19 A. Not living expenses, but I want to bring  
20 everything from there to here because my family --  
21 my children don't want to go back. So, you know, I  
22 don't want the money disappear after I go.

23 Q. Okay. And --

24 A. So that's why I want to bring from here.

25 Q. Okay. And if I said to you -- since

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Q. Chaudhary  
November 1, 2024, you transferred more than  
\$219,000 to yourself from Pakistan, right?  
A. Which date?  
Q. Since November 1, 2024, last --  
A. Yes.  
Q. You transferred more than \$219,000 to  
yourself from Pakistan.  
Does that sound right?  
A. Yes. Yes.  
MS. BLUM: Can we go off the record for  
five minutes.  
THE VIDEOGRAPHER: The time is 5:10 p.m.  
We are going off the record.  
(Discussion off the record.)  
THE VIDEOGRAPHER: The time is 5:14 p.m.  
We are back on the record.  
Q. Mr. Chaudhary, what's the name of the  
bank in Pakistan that you held an account at?  
A. MCB.  
Q. Do you hold accounts at any other bank?  
A. Yes. Silk Bank.  
Q. In Pakistan?  
A. Yes.  
Q. And just for the record, is that