

1 Q. Okay. So just so that I'm clear on
2 this, in designing this product, this newborn
3 sleeper, in part, it was because your son had
4 issues when he was smaller, when he was a newborn,
5 and then approximately nine years later, this
6 product -- you develop a product because there's
7 not one on the market.

8 And you brought the product to your
9 employer, Fisher-Price, and you did some -- some
10 research, and there was not a product on the market
11 that was an inclined sleeper, except for the wedge.
12 Then you also asked your pediatrician what?

13 A. I did not ask my pediatrician anything
14 at that time.

15 Q. Okay.

16 A. It was recalling what my pediatrician
17 recommended when my son was little.

18 Q. And what did he recommend?

19 A. To elevate his head when sleeping. He
20 said you could put a pillow underneath the mattress,
21 or he didn't really have a good way to do it.

22 Q. Do you -- do you know that the American
23 Academy recommends that children sleep in a supine,
24 face-up position?

25 A. Can you define supine for me?