

# EXHIBIT 2

IN THE CHANCERY COURT OF DAVIDSON COUNTY, TENNESSEE  
TWENTIETH JUDICIAL DISTRICT PART IV

KEVIN BURNS ET AL.,  
Plaintiffs,

vs.

NO. 25-0414-IV

FRANK STRADA, ET AL.,  
Defendants.

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DEPOSITION OF  
DR. MARK FOWLER

October 27, 2025  
12:53 p.m. (ET)

Holiday Inn Express Union City  
810 Bream Boulevard  
Union City, Tennessee 38261

Chloe Fry, 1088

1 injection protocol?

2 A. Yes.

3 Q. Okay. Can you tell me what you believe your  
4 role to be under that protocol as the physician?

5 A. Certify the death of the inmate.

6 Q. Okay. Anything else?

7 A. That's it.

8 MR. BRAZER: Okay. Could I have a copy of the  
9 2025 protocol, please? And we have a copy for the  
10 reporter as well, please. Dr. Fowler, I'm directing  
11 you to Page 8 of the 2025 Lethal Injection Protocol.  
12 And we are marking this as Exhibit 5.

13 (Exhibit 5 was marked for identification.)

14 BY MR. BRAZER:

15 Q. Thank you. All right. Dr. Fowler, would you  
16 mind reading the paragraph under the word physician on  
17 Page 8?

18 A. "The physician is responsible for determining  
19 that the inmate is deceased using acceptable --  
20 acceptable medical standards and establishing central  
21 IV access if necessary."

22 Q. Okay. Is your understanding from reading that  
23 paragraph, in addition to determining death, you would  
24 be responsible for establishing a central IV line if the  
25 IV team is unable to establish a peripheral IV line?

1 A. I have no idea.

2 Q. All right. Okay. How many times have you  
3 placed a central IV line?

4 A. A dozen or more.

5 Q. Okay. When was that?

6 A. When I was in the emergency room, primarily.

7 Q. Okay. So when was the last time you placed a  
8 central IV line?

9 A. Probably somewhere close to the last aspect of  
10 my tenure in the emergency room.

11 Q. Okay. So if I could have here, let me just  
12 refer back to your CV. So that would be around 2013;  
13 is that correct?

14 A. Yes, sir.

15 Q. Okay. And you stated that you never had any  
16 complications establishing a central IV line in those  
17 cases?

18 A. I didn't say that.

19 Q. Okay. Did you ever have complications in  
20 establishing a central IV line in those cases?

21 A. Just one time.

22 Q. Could you tell me what happened?

23 A. The guide wire wound up in the carotid vein,  
24 which is an undesirable placement, but you can reverse  
25 that fairly quickly.