

IN THE SUPERIOR COURT OF THE STATE OF ARIZONA
IN AND FOR THE COUNTY OF MARICOPA

STATE OF ARIZONA,

Plaintiff,

vs.

DANIEL HAYDEN WILLOUGHBY,

Defendant.

CR91-10184

BEFORE: The Honorable Frank T. Galati,
Judge of the Superior Court
and a Jury

EXCERPT OF TRANSCRIPT OF PROCEEDINGS

Phoenix, Arizona
November 1, 2001

APPEARANCES:

For the Plaintiff:

MARICOPA COUNTY ATTORNEY'S OFFICE
By: Michael J. Lessler, Esq.
COCONINO COUNTY ATTORNEY'S OFFICE
By: David W. Rozema, Esq.

For the Defendant:

By: Alan Simpson, Esq.
Richard D. Gierloff, Esq.

Defendant present in open court.

COPY
Prepared for:

Elizabeth A. Lemke, RDR, CRR
AZ Cert. No. 50007
Official Court Reporter

Phoenix, Arizona
November 1, 2001

E X C E R P T O F P R O C E E D I N G S :

YESINIA PATINO GONZALEZ,
having been first duly sworn upon her oath, was examined
and testified as follows:

CROSS EXAMINATION

BY MR. SIMPSON:

Q. Let's talk about February 23rd for a moment,
okay? On February 23rd in Rocky Point you walked into
to the home that was being rented by Dan Willoughby and
his family?

A. Yes.

Q. You wanted to be the one that Dan took first
to that home?

A. Yes.

Q. When you learned that Dan was going to go
down there that weekend with his kids, you didn't like
that.

A. No.

Q. You told Dan, "Take me instead."

A. Yes.

Q. "I want to be the first one to be in that

1 house with you."

2 A. Correct.

3 Q. "Don't leave me alone that weekend."

4 A. Correct.

5 Q. When you were there that weekend outside
6 that house, at some point we heard you testify that you
7 went inside the house, right?

8 A. I did went inside the house.

9 Q. I'm sorry?

10 A. I did went inside the house, yes.

11 Q. You tiptoed inside of that house?

12 A. Yes.

13 Q. You took off your boots that you had on
14 before you went inside the house?

15 A. Correct.

16 Q. You walked into that bedroom and you hit
17 Trish Willoughby on the forehead with a round steel
18 ball?

19 A. No. I didn't do nothing to Trish. I just
20 stab her.

21 Q. You just stabbed her?

22 A. Yes.

23 Q. Okay. You tried to strangle her too; is
24 that correct?

25 A. Yes.

1 A JUROR: I didn't hear the last question.

2 MR. SIMPSON: I said you tried to strangle her
3 too.

4 THE COURT: And she said "yes." The answer was
5 "yes."

6 Q. BY MR. SIMPSON: Ma'am if you could refer to
7 the interview transcript again that's in front of you.
8 And I apologize, I don't recall the exhibit number.

9 THE COURT: 412.

10 MR. SIMPSON: Thank you, Judge.

11 Q. BY MR. SIMPSON: If you could look at that
12 and if you could go to page 131 and if you could read
13 131 through 132.

14 THE COURT: She's done, Mr. Simpson.

15 MR. SIMPSON: I'm sorry.

16 THE COURT: She's done.

17 MR. SIMPSON: I'm sorry. I didn't notice the
18 glasses up there. Thank you.

19 Q. BY MR. SIMPSON: Now, a moment ago when I
20 asked you if you hit Trish Willoughby with the ball, you
21 said no; is that correct?

22 A. Correct.

23 Q. You and I talked about that while we were
24 together in July with the investigator; is that right?

25 A. That's right.

1 Q. And what you just read is the transcript of
2 the colloquy or the dialogue that you and I had together
3 about that same subject, correct?

4 A. Correct.

5 Q. And beginning at page 132, which is a
6 continuation of the question that was -- and for
7 counsel, I'll read the -- 131 first.

8 MR. LESSLER: I'm with you. 132. Top of 132.

9 MR. SIMPSON: Top of 132.

10 MR. LESSLER: "...when you were hitting her with
11 the ball."

12 Q. BY MR. SIMPSON: I asked you the question.

13 "Okay and when you were hitting her
14 with the ball as you -- you said you
15 got tired. Did you ever hit her in the
16 area of the chest at all with the
17 ball?"

18 And you answered back: "With the
19 ball?"

20 And then I asked, "Yeah. You might
21 have. Or do you remember?"

22 Answer: "I don't remember."

23 Did you have -- I asked, trailed off,

24 And your response: "It was" --

25 There was an inaudible on my question.

1 And you said: Yes. Uh-huh, but I -- I
2 concentrated on her head.

3 I answered: All right.

4 And you continued: Uh-huh, because I
5 knew that she would die that way. Hit
6 her on the head.

7 And there's an inaudible.

8 That's what you told me back in July of
9 this year, didn't you?

10 THE COURT: You need to answer, Ms. Patino.

11 THE WITNESS: Yes.

12 Q. BY MR. SIMPSON: And when you answered those
13 questions, we were there together in the prison in
14 Hermosillo.

15 A. Yes.

16 Q. There were deputies or guards of the prison
17 right outside the door that you, I, and the investigator
18 were within.

19 A. Correct.

20 Q. The door wasn't locked.

21 A. No.

22 Q. Nobody was pressuring you what to say.

23 A. No.

24 Q. You were free to be there or not to be
25 there?

1 A. Correct.

2 Q. Now, prior to that, in May -- on May 23rd of
3 2000, you were in a different prison then, weren't you?

4 A. I have been in several prisons in Sonora.

5 Q. Wymus is in Sonora?

6 A. Wymus.

7 Q. I'm not good with those names, am I?

8 A. No.

9 Q. You were in Wymus in May of 2000?

10 A. Yes.

11 Q. You were in the prison that was there?

12 A. Yes.

13 Q. And while you were there in the prison, I
14 paid you a visit?

15 A. Yes.

16 Q. I paid you a visit with a fellow whose name
17 is Dr. Thomas Streed?

18 A. Yes.

19 Q. You knew we were coming down to visit with
20 you?

21 A. Correct.

22 Q. You agreed to permit us to visit with you?

23 A. Correct.

24 Q. And we did, right?

25 A. Yes.

1 Q. And while we were together that day, you
2 told Dr. Streed and myself that you hit Trish several
3 times with the steel ball, didn't you?

4 A. Yes.

5 Q. And then in August just this past August,
6 August 31st, again, I was in Hermosillo with you?

7 A. Correct.

8 Q. I was again in Hermosillo with you with
9 Dr. Thomas Streed?

10 A. Correct.

11 Q. And again while I was with you with
12 Dr. Thomas Streed, you agreed to speak with us?

13 A. Correct.

14 Q. Nobody was pressuring you what to say?

15 A. No.

16 Q. You were free to leave?

17 A. Correct.

18 Q. And you told us then that you hit Trish
19 Willoughby with the steel ball?

20 A. Correct.

21 Q. You brought a soda bottle or some type of a
22 soda container inside of that house, right?

23 A. Yes.

24 Q. Why?

25 A. I was thirsty.

1 Q. You were thirsty?
2 A. Yes.
3 Q. Okay. The back door that you went to?
4 A. Yes.
5 Q. Do you remember there was a screen door on
6 it?
7 A. Yes.
8 Q. And there was a wooden door as well?
9 A. Yes.
10 Q. The wooden door was open?
11 A. Yes.
12 Q. The screen door was closed?
13 A. Yes.
14 Q. It was latched?
15 A. Yes.
16 Q. You grabbed a nail?
17 A. Yes.
18 Q. You popped up the eyelet?
19 A. Yes.
20 Q. And then you went in the house?
21 A. Right.
22 Q. After taking off your boots?
23 A. Correct.
24 Q. And tiptoed in the house?
25 A. Got in the house.

1 Q. I'm sorry. I said tiptoed in the house.

2 You made a comment about a red rope.

3 Do you remember talking about a red rope that you had?

4 A. That Dan Willoughby bought for me, yes.

5 Q. And he bought it at a gun shop, did you say?

6 A. Yes.

7 Q. Or did he buy it at an Army surplus shop?

8 That's the same as a gun shop?

9 A. Well, I don't know.

10 Q. Well, to in your way of thinking --

11 A. He bought it at an Army store supply.

12 Q. Did you leave that rope inside of the house
13 when you left the house?

14 A. Yes.

15 Q. Yesterday, yesterday you told us that Dan
16 looked for a silencer. Do you remember that discussion
17 you were having yesterday with us?

18 Did you testify yesterday, ma'am, that
19 Dan Willoughby told you he was going to look for a
20 silencer?

21 A. Yes.

22 Q. You looked for a silencer to kill Trish
23 yourself?

24 A. Yes.

25 Q. You had thought about going into the

1 Willoughby home and murdering Trish there?

2 A. Yes.

3 Q. But you also thought that if you did that,
4 then Dan and the kids would hear.

5 A. Correct.

6 Q. That's why you were looking for a silencer?

7 A. Correct.

8 Q. In looking for a silencer, you went to a bar
9 here in Phoenix?

10 A. El Capri.

11 Q. The El Capri Bar here in Phoenix, that's a
12 bar that's on about 35th Avenue and is it Van Buren?

13 A. Yes.

14 Q. It's a bar you had been into a number of
15 times before?

16 A. Correct.

17 Q. You know a lot of people that are there at
18 that bar?

19 A. Correct.

20 Q. You know a lot of people who are involved in
21 the drug trade at that bar?

22 A. Correct.

23 Q. And you asked them in the bar if they could
24 get you a silencer.

25 A. Correct.

1 Q. But you could not get a silencer from any of
2 the people at the Capri bar?

3 A. Nor in Mexico either.

4 Q. Or in Mexico either. So you went to Mexico
5 to also look for a silencer?

6 A. Correct.

7 Q. You traveled -- you traveled to Nogales?

8 A. Yes.

9 Q. To look for the silencer?

10 A. Yes.

11 Q. By yourself?

12 A. Yes.

13 Q. A silencer to put on a gun to kill Trish
14 Willoughby?

15 A. Yes.

16 Q. Dan Willoughby had not looked for a
17 silencer, did he?

18 A. No.

19 Q. You were the one looking for that?

20 A. Correct.

21 Q. And you began looking for the silencer about
22 a month before Trisha's murder?

23 A. Correct.

24 Q. Yesterday, yesterday you told us that Dan
25 Willoughby showed you the metal ball?

1 A. Yes.

2 Q. That's what you said yesterday?

3 A. Yes.

4 Q. You got the metal ball from a guy in the
5 parking lot of the El Capri?

6 A. Correct.

7 Q. You were in the car in the parking lot in
8 the El Capri, the El Capri Bar parking lot?

9 A. I didn't have a car.

10 Q. No, you didn't have a car. You were inside
11 of a car that was owned by a fellow there who was a
12 dark-skinned Mexican?

13 A. He was a friend of mine.

14 Q. A good friend of yours?

15 A. Yes.

16 Q. He was a friend who you partied with at
17 times?

18 A. Yes.

19 Q. You did coke together?

20 A. Yes.

21 Q. And while you were in his car in -- at the
22 El Capri parking lot, you were doing some coke with him
23 then?

24 A JUROR: I didn't hear that.

25 MR. SIMPSON: I'm sorry. I apologize.

1 Q. Ma'am. Ma'am, it caught your interest?

2 A. What do you mean?

3 Q. You noticed it on the floor, correct?

4 A. Yes.

5 Q. You had never seen anything like it before?

6 A. No.

7 Q. It caught your eye? It took your interest?

8 A. Yes.

9 Q. You asked what it was used for and you
10 learned it was for some type of exercise?

11 A. Yes.

12 Q. You told him you exercised?

13 A. I did.

14 Q. You asked him if you could have it?

15 A. Yes.

16 Q. And he gave it to you?

17 A. Yes.

18 Q. And you took it home to your apartment?

19 A. Yes.

20 Q. And that's the ball that was taken inside of
21 the home in Rocky Point and used to bludgeon or hit
22 Trish Willoughby?

23 MR. LESSLER: Objection, foundation.

24 THE COURT: Objection sustained to the form of
25 the question.

1 Q. BY MR. SIMPSON: That ball went to Mexico?

2 MR. LESSLER: Objection, foundation.

3 THE COURT: The same. Sustained.

4 Q. BY MR. SIMPSON: You took the ball to
5 Mexico?

6 A. Yes.

7 Q. You took the ball to Mexico in your purse?

8 A JUROR: Can you repeat the question, please.

9 Q. BY MR. SIMPSON: You took the ball to Mexico
10 in your purse?

11 A. Yes.

12 Q. You took the ball to Mexico in your purse on
13 February 23rd of 1991?

14 A. Correct.

15 Q. You brought the ball that was in your purse
16 into the home that the Willoughby's had rented in Rocky
17 Point?

18 A. Correct.

19 Q. It was in your purse when you tiptoed inside
20 of the home?

21 A. Yes.

22 Q. As you tiptoed inside of the home without
23 your shoes on?

24 A. Yes.

25 Q. And you took that ball out as you got to the

1 bed on which Trish Willoughby was lying?

2 A. Yes.

3 Q. You took the ball out and you hit Trish
4 Willoughby?

5 A. Yes.

6 Q. And you hit her and you hit her and you hit
7 her again?

8 A. Yes.

9 Q. Before you hit her, she was lying on the bed
10 reading a book?

11 A. Correct.

12 Q. And as you hit her, there was a towel or
13 something over her head?

14 A. Correct.

15 Q. As you hit her time and time again, you grew
16 tired?

17 A. Correct.

18 Q. She was reading?

19 A. Can you stop asking me those kind of
20 questions now.

21 THE COURT: You need to answer the question.

22 THE WITNESS: I have been answering them, Judge.

23 Q. BY MR. SIMPSON: Ma'am, you grew tired of
24 hitting her with the heavy ball?

25 A. Yes.

1 Q. When you stopped hitting her, she wasn't
2 dead yet?

3 A. No.

4 Q. You were surprised on how hard it was to
5 kill her?

6 A. Yes.

7 Q. You took a rope out of your purse and you
8 tried to strangle her?

9 A. Yes.

10 Q. The bed was too soft and her neck flexed
11 down as you put pressure on the rope?

12 A. Correct.

13 Q. She still was not dead?

14 A. No.

15 Q. You walked into the kitchen and got knives?

16 A. Yes.

17 Q. Not one knife, not two knives, but you got
18 three knives?

19 A. Butter knives.

20 Q. Butter knives. With those butter knives,
21 you walked back into that bedroom?

22 A. Yes.

23 Q. Her body was covered, the head with the
24 towel?

25 A. Yes.

- 1 Q. The towel was bloodied?
- 2 A. Yes.
- 3 Q. There was blood on the sheets?
- 4 A. Yes.
- 5 Q. There was blood, a lot of blood on her body?
- 6 A. Yes.
- 7 Q. You took the knives and you tried to stab
- 8 her?
- 9 A. They didn't penetrate her skin.
- 10 Q. Not for lack of you trying to get the butter
- 11 knives to penetrate her skin?
- 12 A. Correct.
- 13 Q. You jabbed and you poked at her?
- 14 A. Correct.
- 15 Q. You jabbed and you poked at her so hard, one
- 16 of the butter knives bent?
- 17 A. I don't know that.
- 18 Q. After you grew tired of that, she was still
- 19 alive?
- 20 A. Yes.
- 21 Q. You stuck a knife into the side of her head?
- 22 A. I didn't know that.
- 23 Q. You don't remember that; is that right?
- 24 A. Correct.
- 25 Q. You left the house after being in the house

1 and took the steel ball with you?

2 A. Correct.

3 Q. You went back to your brother's Chevy pickup
4 truck?

5 A. I went to pick up my brother.

6 Q. To pick up your brother, you used his truck?

7 A. Yes.

8 Q. You went from the house to the truck with
9 the ball?

10 A. Yes.

11 Q. The ball that you had used to hit Trish
12 Willoughby?

13 A. Yes.

14 Q. As you drove away from the home that they
15 had rented together, you threw the ball out the truck
16 window?

17 A. Yes.

18 Q. When you left, she was gasping for air?

19 A. Yes.

20 Q. You were amazed that she was still alive?

21 A. Yes.

22 Q. You never thought it would be that hard to
23 kill somebody?

24 A. That's right.

25 Q. In fact, you have remarked that if you ever

1 were to do this again, you'll use a gun?

2 A. Yes.

3 Q. You have no remorse for the murder of Trish
4 Willoughby because it was her time to go?

5 A. Yes.

6 Q. You picked up your brother at the plaza
7 where he was waiting for you?

8 A. Yes.

9 Q. You drove to the border?

10 A. Yes.

11 Q. Tony let you drive?

12 A. I driyed.

13 Q. All the way to the border?

14 A. Yes.

15 Q. You were nervous?

16 A. Yes.

17 Q. You wanted to get away from that house as
18 fast as you could?

19 A. Correct.

20 Q. And you drove as fast as you could?

21 A. Correct.

22 Q. You, in fact, you have never driven as fast
23 as you did at that time?

24 A. Correct.

25 Q. You made the trip to the border within what

1 seemed to be minutes?

2 A. I don't remember.

3 Q. It was a lot faster getting to the
4 than it was going down to Rocky Point earlier t
5 A. I don't remember.

6 Q. Your brother dropped you off at your
7 apartment?

8 A. Yes.

9 Q. You called him later that night at arc
10 ten o'clock or so?

11 A. Called who?

12 Q. Your brother Tony?

13 A. I don't remember.

14 Q. All right. You didn't talk to Dan for a
15 couple days?

16 A. I don't understand the question.

17 Q. All right. You didn't talk to Dan until
18 early part of the following week?

19 A. On March 3rd.

20 Q. Did you talk to him by telephone before
21 that? Do you remember talking to him?

22 A. No, I don't remember.

23 Q. When you first had contact with Dan after
24 you had murdered his wife, he told you his wife had been
25 murdered?

A. Yes.

Q. You did not tell him that it was you that ordered Trish Willoughby?

A. Of course, not.

Q. He didn't think you had murdered Trish Willoughby?

A. No.

Q. He didn't think you had murdered Trish Willoughby because there was no plan?

MR. LESSLER: Objection. This is all hearsay, Judge.

THE COURT: Objection sustained. We're going to take a 15-minute recess, folks. Keep in mind the time limitation.

(Recess.)

THE COURT: Thank you. The record will show the parties present, counsel, and Mr. Willoughby and Mr. Simpson.

MR. SIMPSON: Thank you, Judge.

Q. BY MR. SIMPSON: Let's talk a moment about when you returned home to the apartment complex, okay?

A. All right.

A JUROR: I'm sorry. You're going to have to continue.

MR. SIMPSON: I apologize. Defense lawyers and I

1 can't talk loud enough.

2 Q. BY MR. SIMPSON: After you got back to the
3 apartment complex, you indicated a moment ago to us that
4 you -- your recall is that your first contact with Dan
5 Willoughby was on the Sunday was on the day you were
6 moving?

7 A. March 3rd.

8 Q. Okay. And you remember the day that was
9 March 3rd apparently?

10 A. Yes.

11 Q. Okay. And you were moving and you called
12 your brothers was it Rubin and Tony to come and help
13 you?

14 A. I can't remember, but I called my family.

15 Q. You called your family.

16 And your brother -- do you remember
17 which brothers it was that came over to help you move
18 out?

19 A. No, I don't remember.

20 Q. Okay. But in any event, your furniture and
21 things they were all cleaned out of the apartment that
22 day?

23 A. Yes.

24 Q. And when Dan and you spoke together you did
25 not tell Dan that you had killed Trish the previous

1 weekend?

2 A. No.

3 Q. And Dan had expressed to you that obviously
4 his wife had died in Rocky Point?

5 A. Yes.

6 Q. All right. He asked you or did he ask you
7 whether or not you were involved in that in anyway?

8 A. Yes, he asked me.

9 Q. And you told him that you were not?

10 A. Is this is what I told you, Mr. Simpson?

11 Q. I'm sorry?

12 A. Is this what I told you?

13 Q. No. I'm asking you what you told
14 Mr. Willoughby on March 3rd at your apartment.

15 A. I don't remember what I told Mr. Willoughby.

16 Q. All right. Okay. Is it your recall that
17 Dan Willoughby -- let me strike that question.

18 Dan moved his clothing out of your
19 apartment as your furniture was being moved out?

20 A. Yes, he did.

21 Q. You were planning on going to -- up to
22 Oregon to spend time with Jack Mielke?

23 A. Yes.

24 Q. And you and Dan were just going to split
25 apart for a while; is that the plan?

1 A. He was -- the agreement that I had with Dan
2 on March 3rd that he was going to bring me to my hotel
3 room where I would spend the night and a thousand
4 dollars to take the plane the following day. Of course
5 that never happened.

6 Q. Because you went to jail?

7 A. I went to jail, yes.

8 Q. You never saw Dan Willoughby again after
9 that day?

10 A. Right.

11 Q. And the thousand dollars that he was going
12 to give you was money for you to get up to Oregon with?

13 A. I believe so, yes.

14 Q. And to spend time with your family, Charlie,
15 that is, and with Jack Mielke up there?

16 A. Right.

17 Q. The money wasn't to run away from
18 investigations concerning the death of his wife.

19 Let me rephrase my question. You had
20 not told Dan Willoughby that you had murdered Trish
21 Willoughby in Rocky Point.

22 A. No.

23 Q. And you had not told him certainly when he
24 indicated he would come back to the Hilton Hotel and
25 give you some money so you had spending money up in

1 Oregon?

2 A. He was going to bring a thousand dollars the
3 next day.

4 Q. And your plan was to spend about three
5 months up in Oregon with Jack?

6 A. Yes.

7 Q. Maybe longer, depending how things went?

8 A. Yes.

9 Q. So you and Dan had been splitting apart?

10 A. Yes.

11 Q. Your relationship had been fragmented?

12 A. Uh-huh.

13 Q. And this was kind of the ending of the
14 relationship?

15 A. Yes.

16 Q. And when you got released from jail and you
17 ultimately were in the car with Harold Goebel --
18 remember Harold Goebel?

19 A. Yes.

20 Q. Harold Goebel was somebody who was kind of a
21 friend of yours, right?

22 A. Yes.

23 Q. And at some point, if I'm not mistaken, you
24 used Harold Goebel's car phone to call over to Dan's
25 house?

1 A. Yes.

2 Q. And yesterday I think you told us that you
3 believe your memory is that you were in jail for about
4 72 hours?

5 A. Yes.

6 Q. If the records reflect that the phone call
7 was 24 or 48 hours, do you have any problem with that?
8 That may have been in two days or one day?

9 A. I was in jail March 7th. I got out on
10 March 7th -- excuse me, I was in jail March 3rd and I
11 got out March 7th.

12 Q. Okay. So your recall is that you only had
13 one phone call from Harold Goebel's car phone to Dan
14 Willoughby's house?

15 A. No, there were two phone calls.

16 Q. Two phone calls. Were they both on the same
17 day?

18 A. Yes.

19 Q. Was one very brief?

20 A. Yes.

21 Q. Followed by a second more lengthier one?

22 A. Yes.

23 Q. The more lengthier one --

24 A. I think the second one was I actually talked
25 to Dan. The first one was Marsha when she told me that

1 Dan was busy with some insurance people.

2 Q. And that's why that call was a short call?

3 A. Yeah.

4 Q. The second call that you had yesterday, I
5 understood you to tell us that Dan was colder toward you
6 on the telephone?

7 A. Yes.

8 Q. And do you recall telling Dan during that
9 phone conversation from Harold Goebel's car that you
10 needed money? Do you remember telling him that?

11 A. Yes.

12 Q. And that you would be getting out of his
13 life -- let me read the entire thing for you, all right?

14 A. Yes.

15 Q. Do you recall telling Dan during that
16 telephone conversation from Harold Goebel's car that you
17 needed money, that you would be getting out of his,
18 Dan's life, and that he and his kids should go on with
19 their lives without you?

20 Do you remember saying that?

21 A. Yes.

22 Q. Now, ultimately you didn't go up to Oregon?

23 A. I got arrested.

24 Q. Right. Well, you're in Harold Goebel's car
25 up to that point. You're out of jail now, right?

1 A. Oh, yes.

2 Q. And Harold Goebel is taking you back to your
3 family, right?

4 A. Yes.

5 Q. And again from your family, that's when you
6 got a little bit, a couple hundred dollars from your
7 mom?

8 A. Yes.

9 Q. And with that money you went into Mexico?

10 A. Yes.

11 Q. And we talked about that earlier today?

12 A. Right.

13 Q. Okay. Now, back in 1997 when you were still
14 in the prison out in Nogales, do you recall in February
15 of that year having contact with a bunch of lawyers
16 about this case? Let me help you out a little bit, all
17 right?

18 A. All right.

19 Q. Do you remember meeting Mr. McMurdie.

20 A. Where was that?

21 Q. You were in Nogales in a prison there. And
22 there was some lawyers that came to visit with you while
23 you were there. One of the lawyers was Steven Mitchell.
24 Another was Mr. McMurdie. They're both with the
25 Attorney General's Office. And one was a fellow by the

1 name of Gil Levy.

2 A. Yes, from Washington.

3 Q. From Washington, okay. Gil Levy was the
4 lawyer who at that time was representing Dan Willoughby,
5 right?

6 A. Right.

7 Q. There was some investigators that were also
8 present with the lawyers. One of the investigators was
9 Kay Lines, right?

10 A. Yes.

11 Q. And also Izzie -- and I'm not even going to
12 try to pronounce his last name.

13 A. Urias.

14 Q. The other investigator was Izzie. And there
15 was a deposition that was conducted with you at the
16 prison with the lawyers?

17 A. Yes.

18 Q. And a deposition is a proceeding that
19 happens under oath, right?

20 A. Right.

21 Q. And the attorneys can ask questions as they
22 did to you that particular day?

23 A. Yes.

24 Q. During the course of the deposition you were
25 asked some questions pertaining to insurance. And I had

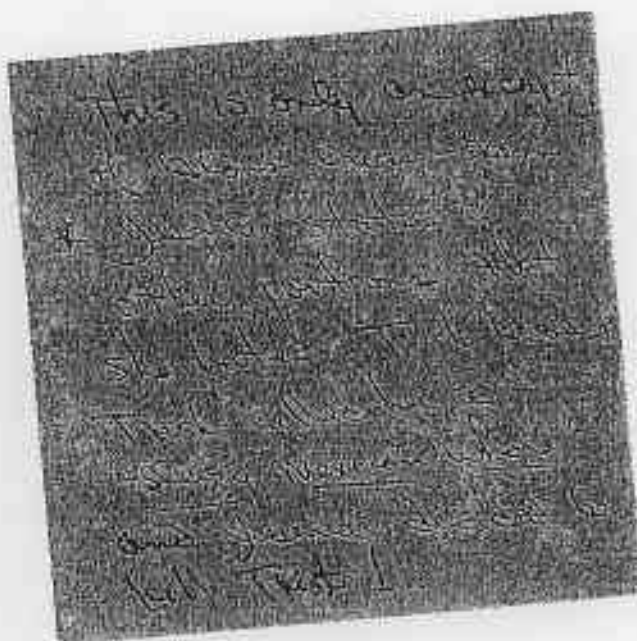
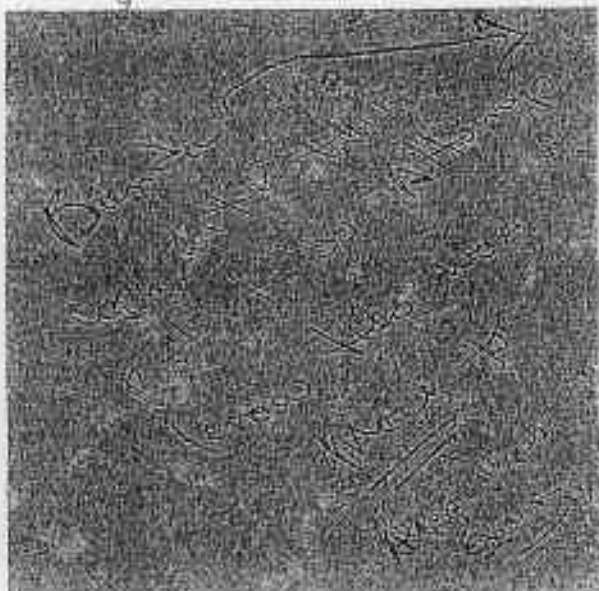
1 a question or two I wanted to ask you about that. All
2 right?

3 A. All right.

4 Q. And we're going to have to probably borrow
5 our clerk's glasses again to read it, because the type
6 is relatively small.

7 (End of excerpt of proceedings.)

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