

1 Am I correct that you really don't have an
2 independent recollection of what exactly went on at
3 that time?

4 A I don't understand your question.

5 Q Throughout the course of your testimony I
6 occasionally see you looking down and reading
7 something.

8 What are you reading down there?

9 A I have a summary of events as they occurred
10 over a period of time 16 years ago.

11 Q All right. So it is really difficult for
12 you to remember without your notes what really
13 happened; am I correct?

14 A No. It is not difficult for me to
15 remember. They are just there to reassure should my
16 memory slip.

17 Q When were you notified that you may have to
18 testify in this case?

19 A I don't remember the exact date. I think it
20 was sometime in early March.

21 Q All right. March of --