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TRANSCRIPT

Videotaped deposition of Patricia P. Ramsey transcript

December 11, 2001

THE VIDEOGRAPHER: We are on the video record at 9:14.

MR. HOFFMAN: Good morning, Mrs. Ramsey, Lin Wood.

This is the deposition of Patricia Ramsey in the case of Robert Christian Wolf versus John Bennett Ramsey and Patricia Paugh Ramsey.

Do you need the index number for that for the tape?

Mrs. Ramsey, have you ever attended a deposition before.

MR. WOOD: Maybe we ought to have --

MR. HOFFMAN: So we have a record of everybody that is here.

MR. WOOD: -- so we have an understanding, we might want to make sure we have a record of who is here and then a couple of other stipulations.

I am Lin Wood. I represent John and Patsy Ramsey.

MR. RAWLS: I am Jim Rawls, co-counsel with Mr. Wood for John and Patsy Ramsey.

MR. RAMSEY: I am John Ramsey.

MS. PAULK: Mahaley Paulk.

MR. BAUER: Derek Bauer.

MR. SCHROEDER: Eric Schroeder.

MR. ALTMAN: Evan Altman, co-counsel with Darnay Hoffman on behalf of Mr. Wolf.

MR. HOFFMAN: Yes. And, of course, Darnay Hoffman, lead counsel on the Chris Wolf case.

MR. WOOD: And I think we have agreed that this deposition is taken pursuant to the Federal Rules of Civil Procedure and that the deposition is taken pursuant to agreement of counsel.

Mrs. Ramsey will read and sign, and I am sure that can be undertaken before any notary public.

MR. HOFFMAN: Certainly.

Also, this is a deposition that is being taken subject to a so-ordered, stipulated protective order also and confidentiality agreement between counsel.

MR. WOOD: It is. And in that regard, I want to make just one statement, if I may, on the record.

MR. HOFFMAN: Sure.

MR. WOOD: Federal Rule of Civil Procedure 26(b)(1) states that the scope of discovery is as follows, and I quote: "Parties may obtain discovery regarding any matter not privileged that is relevant to the claim or defense of any party."

And it goes on to state: "For good cause, the Court may order discovery of any matter relevant to the subject matter involved in the action."

As you know, Darnay, that represents the change that was effectuated in the scope of discovery with the December 2000 amendments to the Federal Rules of Civil Procedure. And in the stipulation and protective order in paragraph 2, the parties, including the plaintiff, and you, on behalf of the plaintiff, have agreed that, and I quote from the protective order, "Consistent with the amendments to the Federal Rules of Civil Procedure, which became effective December 1, 2000, the parties recognize the right of parties' counsel to issue appropriate instructions to parties during their depositions in order to maintain the appropriate scope of discovery as defined in the rules."

I make that observation solely because I do not want there to be any subsequent misunderstanding or misrepresentation as to why it may be necessary, during the course of this deposition, for me, as counsel for the Ramseys, to instruct Mrs. Ramsey that a subject that you are inquiring about is beyond the scope of the Federal Rules of Civil Procedure. That is to say, you may inquire into something that is relevant to the subject matter, but since there has not been good cause shown and a court order entered, as we have noted in our protective order, the parties have agreed that we would instruct the witness not to answer because it would go beyond the claim or the defense in this action and it would not be in any way a matter of Mrs. Ramsey being unwilling to answer a question. It would simply be a matter of, as you and I know, we don't make the rules. We are simply obligated to play by the rules, and so, therefore, we will obviously

play by the rules today. And if we do get outside the relevant scope of discovery, I will exercise my obligation as recognized by you to make an instruction to her not to answer the question.

Agreed?

MR. HOFFMAN: Absolutely.

MR. WOOD: Okay.

MR. HOFFMAN: And, in fact, what I thought we would do is that, if we run into a roadblock with respect to what is, in fact, relevant or not relevant, what we could do is just simply make a notation for the record, and then I thought that the most prudent thing for everybody to do is, as we are coming to the close of discovery, that almost in like an omnibus motion, both parties could present Judge Carnes with anything that they wanted in the way of an instruction to compel an answer, if appropriate.

So if we need to get a judge's ruling on issues or whatever, we will just simply reserve it -- preserve it in the deposition record; and then what we would do is at some future date, just simply go before Judge Carnes and just have her make a one-time ruling on all of our issues and claims and whatever else with respect to discovery, which I think is probably the most economical way to do it, and maybe I think Judge Carnes would probably appreciate it if we handled it that way.

MR. WOOD: Well, I just don't want the record to be misconstrued that, obviously, we understand that there may be, obviously, a need to, in this deposition, to make the instruction. And it is not to be used against the witness. It is simply a matter of trying to properly follow the rules.

And then, if necessary, if someone believes that the witness should have answered, then obviously that party has a right, as that party deems appropriate, to file a motion with Judge Carnes and get a ruling. I think we agree on what we stipulated to, and I think we agree on the scope of the deposition. I don't really think we are going to have a problem. I think you will stay to the issue of the claims made by Mr. Wolf and the defenses made by the Ramseys. And if we don't go beyond that, we are not going to have a problem, I don't believe, on that particular issue.

MR. HOFFMAN: Just for the record, so there is no misunderstanding later on in the deposition, what precisely do you see the claims as Mr. Wolf is representing them in the complaint for the purposes of establishing relevance here?

MR. WOOD: Mr. Wolf has made a claim, as I understand it, that the Ramseys published certain statements in their book that were false pertaining to him, that they published certain statements in their book that were also defamatory with regard to Mr. Wolf. That makes up the first part of his libel claim.

And then he contends that they published those statements, false and defamatory, with actual malice. And as I understand the claim, that actual malice is based on the allegation that Patsy Ramsey killed JonBenet and that Mr. Ramsey has been part of a cover-up.

The second part of the case, as I understand it, is that, subject to the statute of limitations problems, Mr. Wolf is asserting that the Ramseys hired investigators to give the Boulder police information about Mr. Wolf which inflicted emotional distress upon him. Those are your claims, as I think I clearly understand them. Have I got them right?

MR. HOFFMAN: Absolutely. The only reason I am asking you to articulate them for the record is so that, if I go into any of these claim areas, you will at least deem them relevant for the purposes of the deposition.

MR. WOOD: I will have to deal with that on a question-by-question basis.

MR. HOFFMAN: I understand that, but you do understand that if, in fact, one of the claims is that Mrs. Ramsey was somehow involved in either the authorship of the ransom note or in the death of her daughter, that questions involving that are, in fact, relevant for the purposes of the rules?

MR. WOOD: I don't have any problem with acknowledging that issues regarding ransom note authorship by Mrs. Ramsey, and the issue of whether she, as contended by you and Mr. Wolf, killed her daughter, are clearly part of Mr. Wolf's lawsuit. And that is part of the burden that Mr. Wolf has to carry to prove that beyond clear and convincing evidence.

The point being, though, that there are a host of matters that would go to the subject matter but are not specifically confined to those claims and the defenses, the basic defense being truth, that published statements were true, and that, in fact, Mrs. Ramsey was not involved in the criminal death of her daughter. I think the only other defense we have is not something you would be questioning

Mrs. Ramsey about, and that might go to the issue of I think the 13th defense and the issue of publicity of the plaintiff. I don't think we are going to have a problem; but, for example, personal private information about the Ramseys' life at present certainly would not be relevant to the claims made.

MR. HOFFMAN: No. I agree.

MR. WOOD: That is just one example. I want to make sure we protect that on the record. I think we understand where we are headed, so let's get going and get there.

PATRICIA RAMSEY, having been first duly sworn, was examined and testified as follows:

MR. HOFFMAN: Good afternoon -- actually, good morning, Mrs. Ramsey. Thank you for being here.

A. Good morning.

Q. You just heard your attorney explain, basically, the claims in this action. Is there anything that you need clarified with respect to what he said before we go forward?

MR. WOOD: I don't think she can answer that question.

MR. HOFFMAN: Okay. I just want to give her the opportunity to --

MR. WOOD: We would have to send her to law school and let her go 2 years of practice before we would ask her if she could understand anything I might say.

Q. (By Mr. Hoffman) Mrs. Ramsey, I believe that you were the coauthor on a book called "the Death of Innocence"; is that correct?

A. Yes, sir.

Q. And I would just like to ask you, in your own words, though I know there is discussion in the book, why it is that you wrote the book "Death of Innocence"?

A. My husband and I wrote the book so that we could make sure that the truth was presented accurately from our own hearts and lips.

Q. Were there any other reasons?

A. No, sir.

Q. I am going to -- there is a reference on page 408 of your book. I am going to show that to Mr. Lin first.

MR. WOOD: Do you want to mark this?

MR. HOFFMAN: No. I just simply want to refresh her memory with respect to that.

MR. WOOD: This is page 408 of the paperback?

MR. HOFFMAN: Yes, with respect to the paperback.

Q. (By Mr. Hoffman) Where there is --

MR. WOOD: Are you asking her to look at the highlighted portion?

MR. HOFFMAN: The highlighted portion there, just to refresh her memory with respect to maybe another reason why the book was written.

MR. WOOD: You are not representing that this paragraph talks about why the book was written?

MR. HOFFMAN: Well, it is one of the express reasons for going into the material that was gone into there with the hope that the killer will be caught; the truth being that the Ramseys, contrary to media reports, were not responsible for their daughter's death, and that this book, in fact, not only shows that, but also the book contains a chapter on the murderer, meaning that there is a profile of the potential murderer. And I wanted to know from Mrs. Ramsey whether the purpose of the book was something more than just a general, you wanted the truth out.

Q. (By Mr. Hoffman) Was the purpose of the book also to present information to the public who might then be able to come forward as to who the murderer was in this particular case?

MR. WOOD: That doesn't have anything to do with page 408.

MR. HOFFMAN: Well, it is mentioned there. That is one of the stated goals.

MR. WOOD: We may just be parsing words. This talks about their goals, bringing the killer to justice.

MR. HOFFMAN: Right.

Q. (By Mr. Hoffman) Was this part of your goal?

MR. WOOD: Was the book consistent with part of your goals? I think that is a fair question.

THE WITNESS: So could you repeat the question?

Q. (By Mr. Hoffman) You will be asking me to do a lot of that today. Believe me.

Was one of the goals of writing the book to help in the solution of this crime, identifying the possible murderer; meaning that if you put this information before the public, that maybe someone would have information that could then come forward --

MR. WOOD: Objection.

MR. HOFFMAN: You object?

MR. WOOD: I object to the form of the question, but go ahead and finish. I thought you were through.

MR. HOFFMAN: I would like Mrs. Ramsey to explain whether or not that was part of the goal of the book was basically to assist in finding the killer of JonBenet Ramsey.

THE WITNESS: Well, I believe there was a section of the book that talks about the profile of the killer, as we have been told about him. So that information, yes, was included in the book to be brought forth to the public in the event that that would assist in someone remembering things that would lead us to leads that would lead us to the killer.

Q. (By Mr. Hoffman) So would it be fair to say that the purpose of the book was to do something other than just simply tell the truth about the case, that there was -- that you were trying to assist the investigation in some way by including certain information in the book, such as the profile of the murderer?

A. The reason that I wrote the book is so that there is in one place, in black and white, an accurate account of what happened. I mean, when I was writing it, I was thinking of my children and my grandchildren. There are so many stories out there that are false and misleading and untrue, I wanted -- you know, I was thinking of this as a historical document to give to my children.

Q. Could you explain, to the best that you remember, the process by which you wrote the book? I mean, did you sit down with a pen and pad or did you use a Dictaphone? How was the book written, given that both you and John are listed as authors, the actual writing process?

MR. WOOD: I object to the form of the question. You may answer the question, if you understand it. The problem is you kind of sometimes ask two or three questions within one.

MR. HOFFMAN: I understand.

MR. WOOD: I want her to be clear on exactly what the question is. I think, correct me if I am wrong, I think he is trying to find out whether you actually physically typed on a computer, dictated into a tape, made handwritten notes. Is that what you are asking?

MR. HOFFMAN: Exactly.

MR. WOOD: Do you understand that?

THE WITNESS: I think we did some of all of that.

Q. (By Mr. Hoffman) Did you and Mr. Ramsey sit physically together and write the book, or did you write it in separate, you know, environments, meaning you are in one part of the house and he is in another part? Did you compose it that way?

A. Some of all of that. We were living in an apartment at the time, so it was a small living space. So we were --

Q. At some point, I believe there was -- well, I will withdraw that question. Did anyone else assist you in writing the book?

A. We had an editor that was provided by the publisher and a ghost writer, if you want to call it that, who helped us with some of the structure and organization.

Q. Who is the ghost writer?

A. I think his name is in the book there somewhere. Let's see. Oh, Robert Wise, Reverend Robert Wise.

Q. When you looked at the final manuscript of the book, was it very different from what you had originally prepared and given to Mr. Wise, or Reverend Wise?

MR. WOOD: Are you assuming they prepared a manuscript and gave to it Wise and then got back a manuscript?

MR. HOFFMAN: At some point, I am assuming that their work product was turned into a manuscript of some sort and that Mr. Wise worked with it in some way.

MR. WOOD: Well, I am not sure that is right. It may have been given to him piecemeal, Darnay. I think you need to figure that out first.

Q. (By Mr. Hoffman) I will withdraw that question and ask you very simply, explain exactly how you worked with Reverend Wise on writing the book.

A. Well, he would sit, and we would talk. I had some things that I had written, and sometimes he would ask questions about things. It was kind of a back and forth. Sometimes he would take something I had written and edit, and then would -- I mean, it was kind of an evolving process.

Q. Did he use a tape recorder to tape any of the things you were saying?

A. I believe so, yes.

Q. Did you give him written notes to look at?

A. I can't remember exactly. I don't --

Q. Did you prepare notes for the book, written notes?

A. Yes. Sometimes -- I mean, I had some things I had written and some things we just talked about.

Q. Did you keep copies of your notes?

A. No, I did not.

Q. Do you know what happened to your notes?

A. They were thrown away as I finished with that part of the writing.

Q. You threw them away?

A. Yes.

Q. Were you shown a copy of what we would call the rough draft of the book before it was sent to the publisher?

A. There were many drafts, yes, that we would keep reviewing.

Q. Who would prepare the drafts?

A. A typist, I think, or the editor, perhaps. She kept a main manuscript going.

Q. A main file?

A. I am not sure how she did it, but she would keep it.

Q. Were you given an opportunity to review the final manuscript before it was sent to the publisher?

A. I believe so. I believe so.

Q. Do you remember reviewing?

A. Not specifically. I mean, there were so many iterations, I can't remember exactly which.

Q. When was the first time you had an opportunity to read the book from beginning to end as it was published?

MR. WOOD: After it was published?

MR. HOFFMAN: In the form in which it was published.

MR. WOOD: Like the galleys?

MR. HOFFMAN: It could have been a galley. I don't know at what point --

THE WITNESS: You mean the hardback book?

Q. (By Mr. Hoffman) The hardback book, yes.

A. Probably when it was completely published in March of 2000.

Q. Did you see anything that looked like what they call galleys?

A. I don't think I saw galleys.

Q. So the first time you actually were able to read the book, then, is when it appeared in hard cover in the actual bound, hard-covered issue?

A. Well, I read the manuscript. I don't know if you call that the book.

Q. So there was a manuscript, a completed manuscript that you were able to read before it was sent to the printer; is that correct?

A. I believe so.

Q. Did you review it?

A. I believe I did.

Q. And did you look at portions of it in terms of statements that were accurate or not accurate?

A. Well, I primarily -- the way the book is written, I speak, John speaks, I speak, John speaks. And I was mainly concentrating on what I had put in the book.

Q. Do you remember, in the book, whether or not there is a theory of the crime that was -- as you believed it may have been committed talked about in the book, written about?

A. I am not sure what you mean.

Q. The book contains a theory of the crime. Do you remember what the theory of the crime was in the book?

MR. WOOD: Why don't you show her what you are talking about in the book.

THE WITNESS: I mean, the whole book is --

MR. WOOD: There may be a number of different theories that are discussed in whole or 5 in part.

MR. HOFFMAN: I just want to see what she remembers.

MR. WOOD: We are not here to engage in a memory contest about what is or is not in the book. If you have a question about something that is in the book, I think, fairly, you are required to put it in front of her, give her the opportunity to look at it, put it into context, and then respond to your question. So if there is something in the book, be it theory or whatever, show her what you want her to look at, and she will be glad to answer your question.

MR. HOFFMAN: I am going to test her memory right now.

MR. WOOD: We are not going to engage in a memory contest of what is in the book.

MR. HOFFMAN: It is not a memory contest. I have a right to see what, if anything, Mrs. Ramsey currently remembers about the theory of the crime.

MR. WOOD: That is a different question. You are asking her about what is in the book, and she is entitled, and you know she is entitled, to see what you are referencing in the book, put it into context, and then answer your question.

MR. HOFFMAN: Mrs. Ramsey, I am going to withdraw the question.

Q. (By Mr. Hoffman) I would like you to tell me what, if anything, you can remember about the theory of the crime that you may have developed over time.

A. Someone was in our home the night of December 25th and murdered our daughter while we slept.

Q. Is there anything more about that theory that you remember or have developed?

A. Well, that is basically it. There was someone who is not a member of our family in our home that night, took JonBenet from her bed, and murdered her.

Q. With respect to that theory of the crime, is there anything else that you can remember about it?

MR. WOOD: What do you mean is there anything else she can remember about it?

MR. HOFFMAN: Remember about that night as far as it leading to developing that theory.

MR. WOOD: I am going to have to -- that is a question that is either so vague or so broad -- you are asking her now to say, is there anything she can remember about that night that would lead to her developing that theory? Why don't you ask her a specific question, Darnay. That is too broad and too vague.

MR. HOFFMAN: All right.

Q. (By Mr. Hoffman) What is it about the events of that evening and the next day that has led you to this theory of the crime?

A. I found a ransom note. I found my daughter missing from her bedroom. And several hours later, our daughter was found dead in our home. That is pretty clear to make one draw the conclusion that someone came into our home and murdered her.

Q. And you don't feel it was a member of your own family; is that correct?

A. No, sir.

MR. WOOD: I think your answer is really "yes, sir." "Is that correct" would require a "yes" response, so that the record is clear. Don't we agree, Darnay?

MR. HOFFMAN: Yes, that is fine.

THE WITNESS: It was not a member of my family.

Q. (By Mr. Hoffman) I am going to take just a short break because I am going to go into another areA. I just wanted to sort of generally establish it. So let's take a one- or two-minute break. I know people can't hop up or whatever.

MR. WOOD: We don't mind moving.

MR. HOFFMAN: No need to. Just a natural break.

MR. WOOD: Off the video, too?

MR. HOFFMAN: Yes.

THE VIDEOGRAPHER: We are off the video record at 9:39.

(A recess was taken.)

THE VIDEOGRAPHER: We are on the video record at 9:49.

MR. HOFFMAN: Mrs. Ramsey, Lin, I want to proceed when you are ready.

MR. WOOD: Absolutely. Go right ahead.

Q. (By Mr. Hoffman) Okay. Mrs. Ramsey, I would like you to look at page 40 of the paperback edition of your book, "the Death of Innocence." I have highlighted a section I would like you to read, which begins number and then, "The ransom note." Could you read that, please, for the record.

A. "4. The ransom note. Considered earlier and throughout the book, the note was written by the killer and remains an extremely important clue. An adequate amount of handwriting samples from the killer should conclusively tie him to the long and rambling note."

Q. Mrs. Ramsey, do you still agree with that statement?

A. I am not sure which statement.

Q. The statement you just read in your book, do you still agree with it?

A. Well, it is my belief that whoever wrote the ransom note probably had something to do with her murder. Is that what you are asking me?

Q. Yes, I am. I just want to know -- I know this book was written a couple of years ago, and I just want to determine whether it is still your belief, that this statement is still your belief, that you believe this statement to be true today?

A. Yes, I believe that. Yes, I believe that.

Q. Now I would like you to turn to page 145 of "the Death of Innocence," the paperback edition of it, and I would like you to please read out loud starting where it is highlighted "A week and a half after the first of February." If you could, read that, please.

A. "A week and a half after the first of February, the Denver Post ran an interesting observation on the handwritten ransom note that Douglas had spoken about on Dateline. The paper said: 'Leaving a handwritten document at the

scene of the crime, in most cases, is tantamount to leaving one's calling card. Bradley and other forensic document examiners say that it is nearly impossible for a person to disguise handwriting so that an expert can't link a suspect to a document, such as the note found in the Ramsey home. The older a person is, the more automatic and difficult it becomes to conceal the clues. And the longer a document is, the harder it becomes to disguise one's writing.'"

Q. Thank you. Do you agree with that statement?

MR. WOOD: For clarification, does she agree that that is what the Denver Post said, or are you asking her --

MR. HOFFMAN: I am not asking her if that is what the Denver Post said because they are indicating in the book.

MR. WOOD: Right.

MR. HOFFMAN: I just want to know if she agrees -- just because the statement is in here doesn't necessarily mean she agrees with it.

Q. (By Mr. Hoffman) I would just like, for clarification, do you agree with that statement?

MR. WOOD: Or has any understanding of who Bradley is, for example.

MR. HOFFMAN: I am not really concerned whether she knows who Bradley is. I just want to know if she agrees with the statement that "leaving a handwritten document at the scene of the crime in most cases is tantamount to leaving one's calling card." And also, the --

MR. WOOD: Do them one at a time.

Q. (By Mr. Hoffman) Start with that. Do you agree with that statement?

A. Well, I have been told that this is the ransom note of ransom notes, the longest that people have ever seen, and that it is a lot of information for discovering someone's handwriting, so I don't know if it "is tantamount to leaving a calling card."

Q. I was wondering why you had put this statement in this book, if you don't agree with it?

A. I didn't say I didn't agree with it.

MR. WOOD: I am not sure that is her statement. Again, going back, looking in context to who writes this.

THE WITNESS: This was something that was in the newspaper.

Q. (By Mr. Hoffman) I know, but it was included in the book for some purpose, and I am assuming, reading it -- and I don't want to make an assumption, but I can only assume reading it that it is put here because you agree with the basic premise of the article, or at least the basic premise of the section that is excerpted for this.

MR. WOOD: What is the question?

MR. HOFFMAN: I just want to know if she agrees with the first sentence, "Leaving a handwriting document at the scene of the crime in most cases is tantamount to leaving one's calling card."

Q. (By Mr. Hoffman) Do you agree with that statement?

MR. WOOD: With all due respect, I think she has given you an answer to that exact question.

MR. HOFFMAN: I wasn't certain that she had.

MR. WOOD: Let me make sure. I don't want you to not get an answer.

MR. HOFFMAN: I mean, it would be consistent with the earlier statement on page 407 about "an extremely important clue."

MR. WOOD: I thought she did answer that. She said: "I had been told that this is the ransom note of ransom notes, the longest that people have seen, that it is a lot of information for discovering someone's handwriting, so I don't know if it is tantamount to leaving a calling card." I mean, that is what she said.

MR. HOFFMAN: Well, if she could say yes or no, it would be very helpful.

MR. WOOD: That would be, but it would only be if it were the only answer she could give. I think she is entitled to give you her full answer, including an explanation. I think she told you she doesn't disagree with it, but the use of the phrase "leaving a calling card" she is not in the position to comment on.

THE WITNESS: A calling card would have been better because it would have had the person's name, address, and phone number.

Q. (By Mr. Hoffman) I was curious as to why this had been put in the book, if you remember. Do you know why this statement was included in the book, the one you just read, "Leaving a handwritten document at the scene of a crime"?

A. Well, I don't remember exactly. It has been a couple of years.

Q. If you remember.

A. Well, I don't remember exactly why we put it in here. I believe this is a section that John wrote, so you might want to ask him that.

Q. Were you ever asked to give handwriting exemplars at any time by anyone after your daughter's death?

A. Yes, I was.

Q. Can you tell me who asked you to do that, not violating any attorney-client privilege?

A. The Boulder Police Department.

Q. Did anyone else ask you to give handwriting exemplars besides the Boulder Police Department?

A. I gave several of them. I believe it all had to do with the Boulder Police Department. Whether it was the CBI or --

Q. But nobody other than law enforcement asked you to give them handwriting exemplars; is that true?

A. I don't remember anyone else asking me.

Q. I just want to clarify. Do you remember how many times you were asked to give handwriting exemplars by the law enforcement people, authorities? And I am assuming it is in Colorado.

A. Yes. I -- five or six, I think. Something like that.

Q. In the back of the book, Appendix A, page 428 -- actually, you can identify it as 429. It doesn't have 428 in the upper left-hand corner. It is called "A Chronicle of Cooperation." The paragraph that is second from the bottom, there is an indication when handwriting samples were given by John, and there are dates, and then Patsy, and there are dates, and then Burke, and there are dates. Would you just review that and see if that refreshes your recollection with respect to the dates? Are those dates accurate or substantially accurate, if you can remember?

A. I am sure they probably are.

Q. And I am counting them. There is a date "December 28, January 4, February 28, April 12, and May 20." That is one, two, three, four -- it looks like five. Is that what you remember --

A. That seems to be fairly --

Q. -- as to the number of times?

A. -- fairly accurate, yes.

Q. Were you ever given an explanation by law enforcement authorities as to why they were asking you to come in so many times to give exemplars, why they needed you to give exemplars over a period of five different dates?

A. I don't remember them really saying why they needed more.

Q. Did anyone else, without telling me what was actually said, give you a reason as to why you were being asked for so many exemplars?

MR. WOOD: And here you are not to give him, nor is he asking you to give him any information about any discussion you had between yourself and your attorneys, if there was any such discussion. He is not entitled to know that, and he is not asking you about that.

Q. (By Mr. Hoffman) Was there anybody else?

For instance, maybe Lou Smit may have asked you, maybe somebody from Alex Hunter's office might have asked you or told you or whatever, something that is not a privileged communication between you and your attorneys, if you remember.

A. No. Just every time they asked me to do it, I willingly gave it.

Q. Now I am going to ask you about your reaction to it. Were you surprised that you were asked for so many exemplars, to come back five times, in fact? Were you surprised by that?

A. Somewhat, yes.

Q. Were you concerned about that?

A. I was not concerned, particularly.

Q. Do you know if anybody at any time expressed an opinion as to whether you were the author of the ransom note while you were doing this?

A. During the handwriting exemplar process?

Q. Yes. When you were being asked to give handwriting exemplars, did anybody in law enforcement express the opinion that they thought you were the ransom note writer?

A. I don't recall them ever saying that.

Q. Do you know whether or not anybody ever expressed the opinion in front of you that John was the ransom note writer?

A. I never heard anyone say that.

Q. Now, what I am going to do is I need some -- we are going to go through a little housekeeping. I am sorry. I just have to do this for purposes of laying foundations.

MR. HOFFMAN: I am going to ask you to mark these as exhibits. And, Lin, I am going to give you a copy.

MR. WOOD: Okay.

MR. HOFFMAN: This is for identification purposes. Lin, if you want to look at that.

MR. WOOD: Is there a way to relate this to the exhibits that we have --

MR. HOFFMAN: What I am going to do is, basically, I would like to show these to Mrs.

Ramsey at this time and ask her in a foundational way, one, whether she recognizes what she is being shown, can she identify it, and can she identify the handwriting.

MR. WOOD: Are these the exhibits that are attached to the first set of --

MR. HOFFMAN: Uh-huh (affirmative).

MR. WOOD: Do you have them by exhibit number so I can correlate?

MR. HOFFMAN: No, I don't. Right now I am doing it in a particular order, which doesn't relate to that. Whether these are ultimately used or not is another matter, but right now I would like to mark this as Exhibit 1. (Plaintiff's Exhibit-was marked for identification.)

Q. (By Mr. Hoffman) Mrs. Ramsey, I am going to show you a document that has been marked Plaintiff's Exhibit for identification. I would like you to look at it and take your time. I am going to ask you if you recognize the photograph.

MR. WOOD: Let me just say this for the record, Darnay. I think you have given her an enlarged copy of what was possibly one of the exhibits to one of the reports that you filed early in the case with respect to your mandatory responses. And I think she has answered in request for admissions to her best ability whether she could decipher from those copies whether she was the author of the handwriting. To the extent that you are giving her the same exhibits but in a different form, either larger or in color versus black and white, etcetera, I just want to make sure that, if there is any confusion down the road between her ability to try to decipher it now and what she looked at then, that that might be the explanation. So that is why I had asked if you wanted to present her with the actual exhibits; that would, I think, help us be able to look at the same thing.

MR. HOFFMAN: I basically want her to be able to see what it is. I am looking for content, not -
-

MR. WOOD: Not comparison with other copies of those from other sources.

MR. HOFFMAN: I want her to indicate whether she recognizes the photograph.

MR. WOOD: That is fair.

THE WITNESS: I think I have seen this photograph before.

Q. (By Mr. Hoffman) Can you identify, without naming anybody in the photograph, can you identify any of the individuals in the photograph?

A. Just JonBenet.

Q. I would like you to now look at the handwriting below the photograph. Do you recognize the handwriting?

A. Not particularly.

Q. You say "not particularly." You don't recognize this as being your handwriting; is that correct?

A. I don't remember writing it. Is that what you mean? I mean, I don't know. I may have, but --

Q. Do you recognize the handwriting as being your handwriting?

A. No.

Q. Okay. Now we are going to go to another exhibit. (Plaintiff's Exhibit-2 was marked for identification.)

Q. (By Mr. Hoffman) Mrs. Ramsey, I would like you to examine a document I have given you that has been labeled Plaintiff's Exhibit 2 for identification and ask you if you recognize any of the photographs in the document.

A. Yes.

Q. I am going to ask you if you recognize any of the handwriting in the document.

A. Recognize it as mine or someone else's or just --

Q. I will go to the next question. Do you recognize any of the handwriting as being your handwriting?

A. Not particularly.

Q. So you couldn't say, with any degree of certainty, that that was your handwriting?

A. No.

Q. Thank you.

MR. HOFFMAN: Lin, I don't know what you are doing with those.

MR. WOOD: You took the last one back.

MR. HOFFMAN: Fine. Sorry about this. This is one of the more boring parts of depositions.

(Plaintiff's Exhibit-was marked for identification.)

Q. (By Mr. Hoffman) Now, Mrs. Ramsey, I am going to ask you to look at Plaintiff's Exhibit marked for identification and ask you whether or not you recognize this document.

A. Yes, I do.

Q. What do you recognize it to be?

A. An entry form for the Boulder Christmas parade.

Q. Have you ever seen this entry form before today?

A. Yes.

Q. Could you tell me when you have seen it, if you remember?

A. Well, I obviously saw it to fill it out.

Q. Okay. That was my next question. Do you recognize the handwriting in this entry form?

A. Yes, I do.

Q. Can you tell me whose handwriting you recognize it to be?

A. My handwriting.

Q. So all of the handwriting on both pages is your handwriting; is that correct? I mean, no one else --

A. Well, this on the second page is pretty blurry, but I believe it is mine.

Q. So nobody at this event filled in part of it for you?

A. No.

Q. You filled this in completely yourself; is that correct?

A. Yes, I did.

Q. Now I am going to show you another document which I am going to have the reporter mark as Plaintiff's Exhibit for identification.

(Plaintiff's Exhibit-was marked for identification.)

Q. (By Mr. Hoffman) Now, Mrs. Ramsey, I am going to ask you to look at a document that I handed you which has been marked Plaintiff's Exhibit for identification. I am going to ask you whether or not you recognize this document.

A. No, I don't.

Q. I am going to ask you if you recognize the handwriting on the document.

A. I recognize my signature.

Q. Do you recognize any other written part of the document as being your handwriting?

A. It looks similar, but I can't say for sure.

Q. So are you uncertain as to whether the additional handwriting is yours or not, outside of the signature?

A. I am uncertain.

Q. Okay. Thank you.

MR. HOFFMAN: I am going to ask the reporter to mark this as Plaintiff's Exhibit 5 for identification.

(Plaintiff's Exhibit-5 was marked for identification.)

Q. (By Mr. Hoffman) Now, Mrs. Ramsey, I am going to ask you to look at a document which has been labeled Plaintiff's Exhibit 5 for identification. And I am going to ask you whether or not you recognize it.

A. Yes, I do.

Q. What do you recognize it to be?

A. It looks like a greeting written on the inside of a Christmas card.

Q. Do you remember writing a Christmas card like this?

A. Yes.

Q. I am going to ask you whether or not you can identify the handwriting.

A. Yes, I can.

Q. Can you tell me whose handwriting you believe it to be?

A. Mine.

Q. Thank you very much.

MR. HOFFMAN: I am going to ask the reporter to please mark this document Plaintiff's Exhibit for identification. It is two pages, I believe.

(Plaintiff's Exhibit-was marked for identification.)

Q. (By Mr. Hoffman) I am going to ask you, Mrs. Ramsey, whether or not you can identify the document that I have handed you, which is marked Plaintiff's Exhibit for identification.

A. Yes.

Q. Can you tell me what the document is?

A. It is a handwritten note.

Q. Can you identify the handwriting?

A. Yes. It is my handwriting.

Q. Thank you very much.

MR. HOFFMAN: Now I am going to ask the reporter to please mark this as Plaintiff's Exhibit for identification.

(Plaintiff's Exhibit-was marked for identification.)

Q. (By Mr. Hoffman) Mrs. Ramsey, I would like to know if you could identify the document or, actually, the image or figure on Plaintiff's Exhibit marked for identification.

A. No, I can't.

Q. I am going to ask you to look at the handwriting and tell me if you can recognize the handwriting.

A. This is such a bad copy. Do you have the original?

Q. No, I don't. If you can't recognize the handwriting, you simply say you cannot.

A. I cannot.

Q. Thank you very much.

MR. HOFFMAN: I am going to ask the court reporter to mark this document Plaintiff's Exhibit 8 for identification.

(Plaintiff's Exhibit-8 was marked for identification.)

Q. (By Mr. Hoffman) I am going to direct Mrs. Ramsey's attention to the writing that looks like it is on a box that says "Ramsey Xmas" and also, it looks like, some writing on the lower right-hand side which just says "Ramsey." I am going to ask you to look at that carefully, and I am going to ask her, first of all, if she can identify to the best of her ability what is in this photograph.

A. It looks like pictures of boxes taken through a window pane.

Q. Now, I am going to ask you if you can recognize any of the handwriting.

A. This lower one may be mine, but I am not sure.

Q. And the upper left, which says, "Ramsey Xmas"?

A. I don't know.

Q. So you don't recognize it as being your handwriting?

A. Not specifically, no.

Q. Thank you. Coming to the end.

MR. HOFFMAN: I would like the reporter to mark that as Plaintiff's Exhibit 9 for identification.

(Plaintiff's Exhibit-9 was marked for identification.)

Q. (By Mr. Hoffman) Mrs. Ramsey, I am going to ask you -- I am not going to even try to ask you what you are looking at. I am going to ask you if you can see any of the handwriting in this document.

MR. WOOD: Is that an admission that nobody can even determine what the object is?

MR. HOFFMAN: Well, the objects would be subject -- one looks like a box on the lower part, but I am not going to ask Mrs. Ramsey to determine it. I am going to ask Mrs. Ramsey if she can make out the handwriting. And if she can, can she, with any degree of certainty, tell me if she recognizes any of the handwriting.

THE WITNESS: It is pretty hard to tell.

Q. (By Mr. Hoffman) You can simply say no or you are not certain.

A. No.

Q. All right. Thank you.

A. If I can see the original, maybe.

Q. I understand, but based on this document, you are not able to determine?

A. No.

Q. Thank you very much.

MR. HOFFMAN: I am going to ask the reporter to mark this as Plaintiff's Exhibit 10 for identification.

(Plaintiff's Exhibit-10 was marked for identification.)

Q. (By Mr. Hoffman) Mrs. Ramsey, what I am showing you is a series of letters. I am not identifying their source. I am just simply showing you a series of letters. I would like you to look at them carefully. Again, this is Plaintiff's Exhibit 10 for identification. Can you, without knowing the source or where these letters are from, identify any of them?

A. No, sir.

Q. Now, I would like you to also look at the letters and ask me if you see any similarities in the way in which these letters are written. And we will just start from the bottom. Looking at the B.

A. Ask you if I see any similarities?

Q. No. I am going to ask you to comment on whether you see any similarities in the handwriting.

MR. WOOD: Let me just ask you, Darnay, Patsy Ramsey is not a questioned document examiner.

MR. HOFFMAN: I just want her personal observation.

MR. WOOD: We don't know what alterations have been done to these documents. I know where these documents came from. They came from one of your experts.

MR. HOFFMAN: I would prefer you don't identify the source --

MR. WOOD: Why not? She is entitled to be --

MR. HOFFMAN: -- for the purpose of this.

MR. WOOD: We are not here to play games.

MR. HOFFMAN: No, no.

MR. WOOD: Let me finish, Darnay.

MR. HOFFMAN: Mr. Wood --

MR. WOOD: Let me finish, please.

MR. HOFFMAN: Mr. Wood, you can't have a standing objection where you basically counsel, give information to your client in your objection, which is what you are doing right now. I would like you to stop it.

MR. WOOD: Darnay.

MR. HOFFMAN: I have a right to show her a document. For all you know, I am trying to test her perception. You don't know what I am doing in this.

MR. WOOD: Her perception --

MR. HOFFMAN: I am not saying that this means anything. I am asking her to look at these letters, ask her if she recognizes any of them, and then after doing that, asking her if she can perceive any similarities in these letters. That is all. Just as a lay person, her personal observation. And I have a right to do that. And I am going to ask her to do it.

MR. WOOD: I am not --

MR. HOFFMAN: I don't have to identify the source. This could be an eye chart, for all you know.

MR. WOOD: Darnay --

MR. HOFFMAN: For all you know, I am testing her perception.

MR. WOOD: Darnay, it is not an eye chart. It is a document that you --

MR. HOFFMAN: No, it is not. Don't identify the document, Mr. Wood.

MR. WOOD: Are you going to let me finish, Darnay?

MR. HOFFMAN: Not if you are going to identify --

MR. WOOD: Let's take a break.

MR. HOFFMAN: Not if you are going to have a standing objection.

MR. WOOD: We are going to take a break now, and then I'll come back. And when I get a chance to make my statement on the record to perfect the record, we will start again. But if are you not going to give me that fundamental right, then we are not going to start again, Darnay. Do you understand me? Because you are not the judge.

MR. HOFFMAN: If you want to stop the deposition --

MR. WOOD: Let me finish.

MR. HOFFMAN: If you want to stop the --

MR. WOOD: If you don't stop interrupting me, we are going to have to stop.

MR. HOFFMAN: I have to interrupt you if you are, in fact, going to give your client information that you are not supposed to give your client while I am asking her a specific question, which is what you are trying to do right now, at least in my opinion.

MR. WOOD: No, I am not.

MR. HOFFMAN: Yes, you are.

MR. WOOD: You don't know what I am trying to do, because you won't let me do it.

MR. HOFFMAN: You are trying to identify the source of this, and I don't want you to do that for the purposes of this question.

MR. WOOD: We are going to take a break now, and when I have the ability to make my record without interruption and instruction from you --

MR. HOFFMAN: I would like you to make the colloquy.

MR. WOOD: You are not going to stop interrupting; are you?

MR. HOFFMAN: I am not going to basically let you give your client information in a standing objection.

MR. WOOD: Darnay, Darnay, if I make a statement on the record that is inappropriate, you may take that up with Judge Carnes, and Judge Carnes can determine whether I have inappropriately instructed my client through an objection. But you are not the judge, and you are not going to make that decision today. You have the right to say what you want to on this record. I have that right, also. So when you decide that we are going to play on that level playing field, let's get started again. But you are not going to sit here and be the judge and tell me what I am going to do or not do, whether you like it or agree with it or not.

MR. HOFFMAN: Mr. Wood --

MR. WOOD: So we are now going to go off the record and take a break.

MR. HOFFMAN: Mr. Wood, for the purposes of -- before we go off the record and take a break, I foresaw this as a possible stumbling block or speed bump, and as a result, Evan Altman was kind enough to call Judge Carnes' office, and she is willing, in a phone call, to make an immediate ruling on whether or not what I am asking Mrs. Ramsey to do is proper and whether or not your objection is proper. She is in her office. She is available for an immediate conference.

MR. WOOD: I have not been allowed to make my statement. And if we want to address with Judge Carnes at this point --

MR. HOFFMAN: Yes.

MR. WOOD: Excuse me. If the issue to be addressed with Judge Carnes is whether I am allowed to make an objection without interruption from you, then I will be happy to take that up with Judge Carnes. If we are going to take up an objection of mine with Judge Carnes, I think I fairly ought to have the right to state it on the record.

MR. HOFFMAN: But I would like you to make the statement to Judge Carnes before you make a statement in front of your client on the record basically notifying your client of precisely what it is that I am doing with respect to this, which I don't want you to do.

MR. WOOD: I don't know what you are doing with this. I am not trying to make a representation of that.

MR. HOFFMAN: Let's talk to Judge Carnes. Because we went through enough trouble to establish, to call her office yesterday and see if she was available for a conference, because I foresaw this problem precisely coming

up.

MR. WOOD: I yet to understand what you want to take up with Judge Carnes.

MR. HOFFMAN: Let's call her. I will tell her. Quite frankly, I am going to ask her whether or not -- I am going to have you state your objection that you are going to give on the record to her on the phone, and we are going to find out whether or not she thinks it is proper for you to make that objection. And then if she rules it is proper to make it in that form, you can make it in that form.

MR. WOOD: So you want me to state my objection for the first time on the phone with Judge Carnes?

MR. HOFFMAN: That is correct.

MR. WOOD: So you are going to call Judge Carnes -- excuse me. You are going to call Judge Carnes to address with her an objection that you think is inappropriate that I haven't even been allowed to

make yet?

MR. HOFFMAN: No. You started to make it, and it was clear from your making it what you were trying to do, which is basically make the equivalent of a standing -- you were trying to give your client information improperly in order to influence her answer.

MR. WOOD: That is just pure bunk, Darnay.

MR. HOFFMAN: Sorry, but that is what I see it to be. That is why we have Judge Carnes waiting by the phone for us.

MR. WOOD: If you have an issue to take up with Judge Carnes, you have a right to do whatever you want to do. I don't have an issue with Judge Carnes yet.

MR. HOFFMAN: Well, you may have it if you don't get on the phone with us and talk to her.

MR. WOOD: I am going to participate. I am not going to allow you to ex parte a conversation with Judge Carnes.

MR. HOFFMAN: No judge would allow an ex parte communication. You know better than that.

MR. WOOD: Why don't we define, so we can read the record to her, exactly what the controversy is at the moment because I still don't understand it because I haven't been allowed to state an objection. I might not even have an objection.

MR. HOFFMAN: Well, in fact, I would like you to read back what you were about to state as an objection, in fact.

MR. WOOD: Okay. I started off and said -- you said, the question to Ms. Ramsey: "I am going to ask you to comment on whether you see any similarities in the handwriting, and that is on this Exhibit 10, without identifying it for her." And I said: "Let me just ask you, Darnay, Patsy Ramsey is not a questioned document examiner. "**MR. HOFFMAN:** I just want her personal observation. "**MR. WOOD:** We don't know what alterations have been done to these documents. I know where these documents came from. They came from one of your excerpts. "**MR. HOFFMAN:**" --

MR. HOFFMAN: That is the point at which you are starting to give her information.

MR. WOOD: Excuse me. "**MR. HOFFMAN:** I would prefer you don't identify the source.

"**MR. WOOD:** Why not? She is entitled to," and then you interrupted, and I don't think we ever got any further.

MR. HOFFMAN: This is the area that --

MR. WOOD: So the question is whether or not, when you give her a document, is she entitled to know the source of the document before she answers questions about it --

MR. HOFFMAN: No.

MR. WOOD: -- let's put that issue before Judge Carnes.

MR. HOFFMAN: Okay. Yup.

THE VIDEOGRAPHER: We are off the video record.

MR. HOFFMAN: We are going to read that statement. That is what I am objecting to, what you are doing there. So we will read that to Judge Carnes.

MR. WOOD: I think I understand what we want to do with Judge Carnes, and that is to ask her, when you question her about a document, if she is entitled to know what the document is.

MR. HOFFMAN: No. A particular type of document. Okay? Not all documents.

MR. WOOD: She is entitled to know what the document is.

THE VIDEOGRAPHER: We are off the video record at 10:24.

MR. HOFFMAN: And I would like to have this colloquy with the judge so that we don't, basically, just sort of undermine the whole purpose of this, which is to keep you from giving information to your client. If your client is present during this colloquy, it defeats the whole purpose. Okay.

MR. WOOD: Darnay, I don't know what you are up to, and the game here --

MR. HOFFMAN: It is not a game, Mr. Wood.

MR. WOOD: It is not a game. I think if you put a document in front of my client, she is entitled to know what --

MR. HOFFMAN: This is what the document is. It is a series of letters. Any person can see what this is.

MR. WOOD: It is a series of letters that is --

MR. HOFFMAN: That is all. I asked her to look at it, asked her if she recognized any of it, and then I asked her if she could make any comment on whether she recognizes any similarities in the lettering of it. That is all. It is a very simple thing. I don't have to identify the source or anything else.

MR. WOOD: Let me address this issue with Mr. Rawls off the record, and we will come back and see if we can solve the problem in a different fashion.

MR. HOFFMAN: Okay.

(A recess was taken.)

THE VIDEOGRAPHER: We are on the video record at 10:33.

Q. (By Mr. Hoffman) Mrs. Ramsey, I am going to show you a document that has been marked Plaintiff's Exhibit 10 for identification. And I would like you to look at the document. Please look at it carefully. What you -- this document, for the record, contains eight letters that are side by side vertically on the page. The letter D, what looks like the letter S, what looks like letters R and O, what looks like an N, what looks like an O, what looks like an exclamation point, what looks like a G, and what looks like a B. I am going to ask you, Mrs. Ramsey, if you can identify any of these letters as being your handwriting.

A. No, sir.

Q. Now I am going to ask you to look at these letters and tell me -- in fact, I withdraw the question. I would like you to look at the lower letter B, what looks like could be a letter B at the bottom.

MR. WOOD: Left or right? There is a mark with some sort of funny mark over it.

MR. HOFFMAN: That looks like a little hat.

Q. (By Mr. Hoffman) Those letters, for the purposes of this discussion, look like they might be the letter B. I am going to ask you whether you see any similarity in the two letters, any visual similarity, you as a lay person, not as an expert, just looking at it visually, do you see any similarities?

MR. WOOD: And if I might have my objection for the record --

MR. HOFFMAN: Sure, at this point please.

MR. WOOD: -- is simply that I object to the form of the question. I do not believe it is appropriate to ask a lay person a question that goes to what you might believe to be a question document issue from an expert, particularly when you have not identified the source of the writings before the witness, you have not identified in answer whether these documents have been in any way altered, blown up, enlarged, positioned differently. So I object to the form of the question for those reasons. You may answer the question.

MR. HOFFMAN: Also, for the purposes, I would like to state that this answer would not be used for any evidentiary purpose, realizing that there is no proper foundation as to source, as to how these letters came to be what they are. But I will just say one thing for the record, that lay people are, under Article 9 of the Federal Rules of Evidence, are occasionally allowed to identify handwriting as lay people. Frequently, letters are shown to lay people, and they are allowed to authenticate handwriting to that degree, if they have familiarity, which is one of the reasons why I asked you if you were familiar with any of the letters.

MR. WOOD: And I did not object when you asked her whether she believed that to be her handwriting.

MR. HOFFMAN: That is all I am asking.

MR. WOOD: But now you are asking her whether there is similarity from a lay perspective, and I will accept your stipulation that you will not use that answer for any evidentiary purpose. And with that stipulation, you may answer the question.

Q. (By Mr. Hoffman) I would like you to look at the letter B and tell me if those Bs look at all similar to you.

A. Well, they are both lower case Bs.

Q. Is there anything about the Bs that to you looks similar beside the fact they are lower case? The way they are drawn?

A. No, not particularly.

Q. I am going to ask you to look above the letter that we identified as being B at what looks like it could be a G. I am going to ask you to look at the G. I am going to ask you whether you see any similarities between the Gs and what those similarities are.

MR. WOOD: Same stipulation?

MR. HOFFMAN: Same stipulation.

THE WITNESS: Well, they are both lower case G. They are both more of the same size than the Bs are.

Q. (By Mr. Hoffman) Is there anything -- what about the way in which what looks like could be described as a tail with the G, is there any similarity with respect to that?

A. It swings to the left.

Q. Do they look similar, the tails to the G?

A. Somewhat. I mean, a G, you make a G with the tail to the left. Is that what you mean?

Q. Those look similar, like similar tails?

MR. WOOD: You are talking about -- well, again, I think she answered your question.

THE WITNESS: One is squiggly, and one is smoother. But, I mean, it depends on how many things you want to --

Q. (By Mr. Hoffman) Just looking for whatever points of similarity that you, as a lay person --

A. I would say they are both similar in size.

MR. WOOD: Or dissimilar, in fairness.

MR. HOFFMAN: Or dissimilar.

Q. (By Mr. Hoffman) You can make whatever visual observations you want about it. I simply want your reaction.

A. The one on the right is more shaky, it looks like.

Q. What about the one on the left?

A. It is not as shaky. And the one on the right has a little swoop up on the tail, and the one on the left does not. The one on the left has a thicker circle for the part of the G than the one on the right.

Q. Now I am going to ask you to -- before I -- withdraw that question. Do you have any other observations, similarities or dissimilarities, that you would like to express?

A. No.

Q. I am going to ask you to look to what looks like exclamation points, and I am going to ask you if you see any points of similarity or dissimilarity.

MR. WOOD: Same stipulation?

MR. HOFFMAN: Same stipulation.

MR. WOOD: Thank you.

THE WITNESS: One is thick. One is thin. One has a bigger dot than the other. That is fat. That is little.

Q. (By Mr. Hoffman) Anything about the slope or angle or anything else that is similar or dissimilar?

A. I don't know what "slope or angle" means.

Q. The way in which it is going up and down.

A. Well, that is how you make an exclamation point is straight down with a dot under it.

Q. Do they look similar or dissimilar with respect to how vertical they are?

A. Well, the one on the left is squigglier and leans at the top a little bit.

Q. Any other similarities or dissimilarities, before I move to the next one?

A. I don't think they look alike.

Q. The next object or letters look like they might be Os, the letter O. Or they could be a zero from a number. But in any case, a zero or an O.

MR. WOOD: Or it could be even an attempt to make a Q.

MR. HOFFMAN: Could be.

Q. (By Mr. Hoffman) But you can identify it any way you would like, Mrs. Ramsey. And please point out any similarities or dissimilarities that you see.

MR. HOFFMAN: And, Mr. Wood, the same stipulation.

MR. WOOD: Same stipulation. Thank you.

THE WITNESS: I don't think they look a thing alike.

Q. (By Mr. Hoffman) So you would say they are just dissimilar. Would you point out their dissimilarities?

A. The dissimilarities?

Q. Yes. The dissimilarities.

A. One is large. One is small. One is really heavy and feathered, kind of, and one is smoother.

Q. Any other similarities or dissimilarities before I move on that you would like to make?

A. They both have an opening in the middle.

Q. All right. The hole in the doughnut?

A. Yes.

Q. I would like you to look up to the next letter. Now, that can be an N. That could be a truncated R. It is hard to say. I would like you to look at that and just tell me what similarities or dissimilarities you see between the two.

MR. WOOD: It could be an N, too.

THE WITNESS: It could be a pi.

MR. HOFFMAN: Could be. For all we know, it is a little horse or something that is truncated, or poodle, actually.

THE WITNESS: A poodle?

MR. HOFFMAN: One of those show poodles.

MR. WOOD: I am not seeing the poodle here, Darnay.

THE WITNESS: This is a psych test.

MR. HOFFMAN: Rorschach for attorneys.

Q. (By Mr. Hoffman) If you could, look at that, those two letters.

MR. HOFFMAN: With the same -- Lin, what is it, the same stip?

MR. WOOD: Same stipulation.

THE WITNESS: One is shorter than the other one. The one on the right is shorter than the one on the left. The one on the left has like a little triangle thing over the top of it.

Q. (By Mr. Hoffman) I want to draw your attention to the fact that they seem to merge. There seems to be -- whatever it is, it seems like one thing is running into another, or there is something hanging off of it. It is an awkward looking letter. It could be an R and an O. It could be any other number of configurations.

A. Which one are we looking at? Are you looking at this one?

Q. Oh, no. I am sorry. Are we still at the poodle? I thought we were going to move on after the poodle.

MR. WOOD: I thought we were still at the poodle.

THE WITNESS: I never saw a poodle, for the record.

MR. WOOD: Neither did I. That is why I am staying there.

MR. HOFFMAN: Not going to go there; right?

THE WITNESS: So you are at the third one down now?

Q. (By Mr. Hoffman) Before I finish that, I want to give you the opportunity, do you have any other observation between similarity or dissimilarity between the --

A. The little pi one?

Q. Yeah, the little pi.

A. I mean pi, like a Greek letter pi, pi R squared.

Q. Now we will move to the next configuration, whatever that is. I see it as an R and an O, but that is just the way I look at it. I would like you to tell me what you see and similarities and dissimilarities between the letter.

MR. WOOD: Same stip?

MR. HOFFMAN: Same stip.

THE WITNESS: I just -- that doesn't look like anything in the alphabet that I have ever seen. I mean, it doesn't look like a letter to me.

Q. (By Mr. Hoffman) Okay. Fair enough.

Any specific dissimilarities besides it just doesn't look like a letter between the two non --

A. Well, the one on the right seems to be heavier and has a little piece sticking out the left side. And the one on the left has a little bird over the top of it or something mark.

Q. All right.

A. It looks like they were made with different weights of pencil or something.

Q. If you have no further observations, we will move to the next letter, what looks like it could be an S.

A. Or it looks like it could be a 5.

Q. It could be a 5, too. Any similarities or dissimilarities between the two?

A. The one on the left is larger than the one on the right. The one on the right looks more like an S than the one on the left. The one on the left is more circular, kind of, on the bottom. The one on the right is -- the bottom portion looks more angular.

MR. WOOD: We have the same stip on this?

MR. HOFFMAN: Same stipulations.

Q. (By Mr. Hoffman) Any other observations of either similarities or dissimilarities before I move on, Mrs. Ramsey?

A. No.

Q. I will ask you to look at the top and final one, what I would identify as a D, but that doesn't mean it is a D. I would like you to look at that and tell me what similarities or dissimilarities that you see there.

MR. HOFFMAN: And, Lin, of course, we have the same stip.

MR. WOOD: Thank you.

THE WITNESS: The left one looks like an A to me, and the right one looks like a D. It looks like maybe a shaky or older person might have written it. Kind of squiggly. This one has a higher -- the one on the right has a higher stick on the side than the one on the left.

Q. (By Mr. Hoffman) Right.

A. And the open space, the doughnut hole is bigger on the one on the right than the left.

I don't think they look alike.

Q. Okay. Fair enough.

A. They look like two different letters to me.

Q. Thank you for putting up with that exercise.

MR. HOFFMAN: And, Mr. Wood, thank you also.

Q. (By Mr. Hoffman) You remember earlier I had you read about the handwriting from your book. And I would say that maybe we both concede that the handwriting is an important part of the evidence in this crime.

MR. WOOD: She can speak for herself, but we are not going to have her speaking for you. Concessions are one thing. She has answered your questions about that with respect to her belief.

MR. HOFFMAN: I am just using that foundationally to move on --

MR. LIN: That's okay. I wanted to make sure.

MR. HOFFMAN: -- to move on so that there is no question why I am moving into a particular area.

Q. (By Mr. Hoffman) It goes to the issue of why Mr. Wolf is here in this lawsuit with respect to some elements of it, why in the complaint there is what may appear to you to be an extremely unfair accusation or representation of you as author of the ransom note, as the person who killed her daughter, or whatever. And a lot of this is to try and determine the degree to which the handwriting experts that Mr. Wolf is using in this case can accurately determine whether you are, in fact, the author of the ransom note or not, which is part of why we have been doing this. I just want to show you something that is -- I just want you to look at it. It, again, is why, so to speak, why -- I would like you to mark this as Plaintiff's Exhibit 11. I am going to show this. Now, I am not making any representations in this document as to whether, in fact, its submission means anything other than this was prepared by two handwriting experts. This document is not being

submitted to prove the truth of anything in the document. So if you could, mark that. Lin, we will stipulate to that effect. Would you mark this document, please, as Plaintiff's Exhibit 11.

(Plaintiff's Exhibit-1 was marked for identification.)

Q. (By Mr. Hoffman) Now, Mrs. Ramsey, I am going to tell you that that document, along with reports, handwriting reports, were prepared by document examiners Cina Wong and David Leadman. And other handwriting was prepared -- other handwriting was used in the form of the police exemplars that were given to my office by Mr. Wood pursuant to discovery requests. And those documents are, without a doubt, your handwriting because they were identified by Mr. Wood as being the handwriting exemplars that you personally gave to law enforcement in Colorado at their request during that five-day period.

Now, the problem for Mr. Wolf in this case is the fact that not one of the experts -- Cina Wong, David Leadman, an expert known as Gideon Epstein, Larry F. Siegler, and an expert known as Don Lacey have all identified you as the ransom note writer. It is not a close call, as far as they are concerned. They have identified you. One of them, in fact, said, without doubt you are the author of the ransom note. So in order to be certain that they are, in fact, correct in what they are looking at as examples of your handwriting, I wanted you to look at some of the documents that I gave you. Now I want you to look at the document there and see why, in fact, this, the issue of your authorship, is such a problem.

MR. WOOD: Do you have a question?

MR. HOFFMAN: Yes.

MR. WOOD: Let's ask the question.

Q. (By Mr. Hoffman) Okay. Mrs. Ramsey, did you write the ransom note?

MR. WOOD: Before you answer that, I want to object to the form of the question. And I want to specifically object to each and every one of the prefatory comments with respect to that question which started off a long time ago, where you said: "-- to move on, so there was no question why I am moving into a particular area." "By **MR. HOFFMAN:** It goes to the issue of why Mr. Wolf is here in this lawsuit" -- beginning at that point down through and including everything except for your stipulation, which we will accept. I want to move to strike all of the prefatory comments from that beginning down through where you said and ended, "Now I want you to look at the document there and see why, in fact, this, the question of your authorship, I believe, is a problem." All of those are improper as to form. I move to strike each and every one of them with the exception of your stipulation. I also want to tell you that I was very courteous in letting you sit here and, in effect, lecture my client. That is your one and only lecture, Mr. Hoffman. You are here to ask questions. Now, your question, as I understand it, if you would like to restate it, is, Did Patsy Ramsey write the ransom note. Is that the question?

MR. HOFFMAN: Yes, it is.

MR. WOOD: Why don't you restate that because I don't think the other question isn't worth the paper it is written on or the time you have taken up to ask it because it is totally improper as to its form. Now, ask her a question.

MR. HOFFMAN: First of all, I am going to respond to your ad hominem attack.

MR. WOOD: It is not an ad hominem attack.

MR. HOFFMAN: It is an ad hominem attack, and it is done for the purposes grandstanding, which, you know, seems to be the way you are operating, sir.

MR. LIN: Take that up with Judge Carnes. Why don't you just ask your question.

MR. HOFFMAN: No. I am going to respond to your ad hominem colloquy, which was, in effect, an attack on me. I was not lecturing Mrs. Ramsey. And, Mrs. Ramsey, I apologize if I --

MR. WOOD: You don't have to respond to that. Do you have a question?

MR. HOFFMAN: No, Mr. Wood. I am going to respond to your ad hominem attack, which is what I consider it to be. The fact is, I was not lecturing Mrs. Ramsey. I was explaining to Mrs. Ramsey, prefatory to asking her a question which could be regarded as very insensitive, which is simply, Did you write the ransom note?, as to why I was asking that question. And, quite frankly, I don't think it was improper of me to show a certain sensitivity to a mother whose daughter has died rather brutally.

MR. WOOD: Darnay, Darnay, you have not shown this family any sensitivity since March of 1997.

MR. HOFFMAN: That's not --

MR. WOOD: Let me stop you here.

MR. HOFFMAN: That's not before --

MR. WOOD: Let me stop you here. No, sir. Let me stop you here. I am not going to sit here and have you go back and forth and talk with my client or lecture my client. You are here under the Federal Rules of Civil Procedure to ask questions. I have the right to make an objection. If you deem my objection to be an ad hominem attack, take it up with Judge Carnes.

MR. HOFFMAN: Same here.

MR. WOOD: I believe my objection is 100 percent good. Now, ask your question, let's get answers, and let's move on. We don't need the back-and-forth every time I make an objection. Okay. Please, let's get going.

MR. HOFFMAN: You are responsible, to some degree, for the back-and-forth. Quite frankly, under the Federal Rules, I don't think you have the right to interfere and try to control my deposition.

MR. WOOD: I have the right to make an objection, I did make an objection, and I asked you to state your question.

MR. HOFFMAN: But not an attack on counsel, which is, in fact, what this was. This was an ad hominem attack. You characterized what I was doing with your client as lecturing her.

MR. WOOD: I think the record will speak for itself.

MR. HOFFMAN: And also, I think you spoke outside of anything that was going on here, which was to conduct that you considered to be improper on my part outside of this deposition.

MR. WOOD: I don't know what you are talking about now.

MR. HOFFMAN: You just made a reference -- you can read it back -- to my lack of sensitivity to the Ramsey family in general.

MR. WOOD: You are the one making representations on the record about being concerned.

MR. HOFFMAN: No. I am not making representations. I am explaining.

MR. WOOD: You are wasting all of our time now.

MR. HOFFMAN: No. This is my time.

MR. WOOD: Okay. If you want to waste it.

MR. HOFFMAN: This is my deposition time, and I am going to make a record responding to your ad hominem attack on counsel.

MR. WOOD: Why don't you go ahead and make that record.

MR. HOFFMAN: I just have been making it. I have been making it.

MR. WOOD: When you are through, she will come back and she will answer questions. You don't have to sit here and listen to this, Mrs. Ramsey.

MR. HOFFMAN: If she doesn't want to, that is fine.

MR. WOOD: You don't have to. You can take a break, and you can go ahead and make your response. And when you have a question, we will bring her back in here, and we will answer all your questions that are properly formed.

MR. HOFFMAN: All right. What we will do is this, I am going to ask Mrs. Ramsey a very simple question.

MR. WOOD: Thank you.

Q. (By Mr. Hoffman) Mrs. Ramsey, did you write the ransom note that was discovered by yourself on December 26, 1996, at your home?

A. No, sir, I did not.

MR. HOFFMAN: Okay. Thank you. Now, at this point, I think we will take a break. I think this would be an appropriate time to take a break. Thank you.

THE VIDEOGRAPHER: We are off the video record at 10:55.

(A recess was taken.)

MR. HOFFMAN: Just for the purposes of taking up briefly before we left off, I believe Mr. Wood made a motion to strike or will do so with respect to that, and I just want to formally say that I would object and I do object to any motion to strike any of the material he referred to earlier. That is all. I simply want to be on record as objecting to that. And that is all.

THE VIDEOGRAPHER: Ready to go on the video record?

MR. HOFFMAN: Oh, I want to put that on the video record. Sorry.

THE VIDEOGRAPHER: We are on the video record at 11:07.

MR. HOFFMAN: At this point, I would like to move on to another topic area, but just for the purposes of making a record, Mr. Wood earlier in the deposition said that he was going to object to or asked to strike statements that I had made prefatory to a question that I asked

Mrs. Ramsey concerning the authorship of the ransom note. And just for the record, I object to any attempt to have that stricken from the record. That is all I want to say with respect to that. Mr. Wood, if you want to add anything to that.

MR. WOOD: Next question.

Q. (By Mr. Hoffman) Now I am just going to go into -- I am going to ask for some clarification of things that are in the book, things that I didn't understand. I am going to turn your attention to page 378. It is chapter -- in fact, I can let you look at that. There are two statements there. In fact, Mrs. Ramsey, if you will just give me your book, I will just quickly highlight it. I am sorry about not having done this beforehand. All right. I would like you to read the highlighted portions on page 378 in your book "the Death of Innocence." That is the paperback

edition.

A. "The Boulder grand jury said no to an indictment."

Q. And then the next statement that I highlighted.

A. "The grand jury's secret decision."

Q. Do you have any personal knowledge as to whether or not the grand jury did, in fact, make a decision based on that statement?

A. Well, the district attorney, I believe, made a public statement that said there would not be an indictment.

Q. There is a reference here to the grand jury's secret decision. Do you have any knowledge of a secret decision by the grand jury, any personal knowledge? Are you referring to that?

A. Well, I think all of the grand jury information is under wraps or under seal or something.

Q. But do you know whether or not the grand jury, in fact, made a decision in your case?

A. Just going from what the district attorney said, that there was no indictment.

Q. Okay. But this doesn't indicate -- the reason I am asking you this question is -- withdraw. Is Patrick -- is it Patrick Furman, was he an attorney of yours at one point?

A. Yes, he was.

Q. Were you aware that Mr. Furman made a statement that was published in the Boulder papers to the effect that there was a rumor that the grand jury had taken a straw poll and had decided not to indict?

MR. WOOD: Object to the form of the question in that I think you have inadvertently, perhaps, made reference to the wrong lawyer; but if you have a statement to show her, that might be helpful.

MR. HOFFMAN: I don't have that statement. I am just asking her if she has heard that.

THE WITNESS: I am not aware of a statement by Mr. Furman in the paper.

Q. (By Mr. Hoffman) Then I will ask you, by any of your attorneys --

A. No, I am not.

Q. -- to the effect that the grand jury -- that there was a rumor that the grand jury had taken a secret straw poll and had decided or voted not to indict?

MR. WOOD: You are talking about public statements, not anything attorneys may have said to her?

Q. (By Mr. Hoffman) No. No attorney. I don't want you to reveal anything that is an attorney/client.

A. No, I am not aware of any such statement.

Q. So the statement "The grand jury's secret decision" is not referring to any personal knowledge that you have about what went on in the grand jury room with respect to any decision to indict or not indict; is that correct?

A. I think that adjective was used just referring to grand jury as a whole does everything behind closed doors.

Q. So it is just a figure of speech; is that correct?

A. Actually, I did not write this section. John wrote this. So you might want to ask him that question.

Q. Okay. Thank you. Now, there is an incident in the book on page 19 which you might remember. It is fairly lengthy. I just want you to review it. I am not asking you to read it. It involves the alarm system that apparently failed when you came home. I think you were in your home in Charlevoix. Is that it? It is the next-to-last paragraph on 191. If you could, just look at that to refresh your memory generally.

A. Where it says, "John put in an alarm system"?

Q. System, yes.

MR. WOOD: And you can read anything you need to to put that into context.

MR. HOFFMAN: Yeah.

THE WITNESS: Okay.

Q. (By Mr. Hoffman) Do you remember that incident?

A. About putting the alarm system in?

Q. No. That incident where -- no. Your feelings with respect to security and whatever. It is not an incident. I am going to refer to another part of the book in a minute. Just simply your state of mind in security systems.

A. I guess I am unclear about what you are asking me.

Q. What I am going to ask you is this: Do you know whether or not -- first of all, when you were living in Boulder at the time of the death of your daughter, did you have a security system in your home?

A. Yes, we did.

Q. Was that a security system that you used at the time you went out that night, December 25th, as you would explain it in your book? When you went out visiting people, did you have the security alarm on that night?

A. No, we did not.

Q. When you moved to Atlanta, did you install a security system in your homes, any of them?

A. Yes, we did.

Q. Did you have a security system in the home that has been identified as the Atlanta -- not mansion, but that -- I don't have the address. The house where John was assaulted in May of, I think it was, 2001. Do you know if there was a security alarm in that facility, that home, in Atlanta?

A. There was. When we moved in, we installed a very elaborate security system. And subsequent to that, we had some extensive remodeling done, and the security system was dismantled and was subsequently reinstalled.

Q. Who was in charge of, in Boulder, with turning the security system on or off? Was that you or was that John, normally?

A. We normally did not use the security system in Boulder.

Q. Why was that?

A. Because we felt safe in Boulder.

Q. In Atlanta, I believe the security system was not on when John was assaulted. Do you know if that was true or not?

A. I don't believe that it was on.

Q. Do you know why it wasn't on?

A. I don't know why it wasn't on.

Q. Were you concerned that it hadn't been left on?

MR. WOOD: You are assuming it was not dismantled at that time?

MR. HOFFMAN: I actually ought to go back to that, because you did mention "dismantling."

MR. WOOD: I am trying to be lenient with you. We have had a few back-and-forths, Darnay, but I have a lot of trouble understanding what this has to do with Chris Wolf and the allegations in his claim or the defenses to this case.

MR. HOFFMAN: Do you want me to explain?

MR. WOOD: If you feel like you need to, it might be helpful.

MR. HOFFMAN: Fine. Oftentimes, a jury or a trier of fact, as the case may be, is allowed to consider something other than forensic evidence in determining whether somebody is involved in a crime or not, or just in any event. And sometimes it is the demeanor of the witness on the stand, whether a witness is, in fact, telling the truth or not telling the truth, or whether there are inconsistencies in the story which are such that a jury would have a right to draw what we call an inference; and from that inference, what we call consciousness of guilt. So the theory is that, if a person is thought to be not telling the truth or just simply the story is so implausible or inconsistent that it indicates that there is a consciousness of guilt, which a jury can use, at least in a criminal case, to determine guilt or innocence, it can be an element in it.

MR. WOOD: Talk to me.

MR. HOFFMAN: I hope I am stating the law correctly. And that is one of the areas I am going into in the deposition for the purpose -- depositions, from what I understand, Lin, from the federal rules, allow you to go into areas where you might be able to impeach a witness later on. And so sometimes the questions don't appear to be relevant except for the impeachment purposes. So that is one of the reasons why I am going into this area.

MR. WOOD: Well, I am not going to make a statement about whether I agree or disagree with your statement of the law. It is your right to make that statement. I understand impeachment. I understand that it has to go to a relevant and material issue. I have grave doubts about whether an incident in 2000 that occurred in the Ramseys' home here where Mr. Ramsey was assaulted when he got in and found someone that had broken in and stolen a number of items from his home has anything whatsoever to do, from a relevancy standpoint or from an impeachment standpoint, with the issues raised in Chris Wolf's libel lawsuit. But I am going to let her answer the question because I don't think it is -- you know, it is one of those things we don't need to come back and do later. You can get the answer, but I just think that -- you know, just keep in mind that I think you are pushing the envelope here, if not going beyond it.

MR. HOFFMAN: For the purposes in case you raise an objection, I will just simply explain --

MR. WOOD: I will let her answer. You do what you got to do.

MR. HOFFMAN: -- briefly why I am doing this, and what it is about the security system that I find intriguing in this case. And it is the fact that there were concerns expressed in the book about the security of the Ramsey family and the fact that the Ramsey family felt insecure. And,

naturally, one of the areas that you would think would concern a family is the fact that a night when their daughter had been murdered, the security system had not been working. And if there was any --

THE WITNESS: I believe in the book --

MR. WOOD: No. Hold on. This is where we don't need to go. The security system was not turned on. And I think if you are familiar with the book, they made it very clear why they didn't use it in Boulder.

MR. HOFFMAN: Right.

MR. WOOD: The point is, you are asking about an incident that occurred, you say, in 2000 where Mr. Ramsey came home while his house was under renovation with construction workers there and found someone in his home stealing items, and there was a physical altercation. And you are asking about the security system here in 2001. And I am just simply letting you know, Darnay, I am going to let her answer questions about that, but I think you are over the line on relevancy to the claims and defenses in this case. But I am trying to be lenient because I want you to have the opportunity to push the envelope out, but I would just ask you to keep in mind that we are stretching this, in my view, and I would ask you to --

MR. HOFFMAN: I am trying to --

MR. WOOD: No explanations are needed. Your theory of the case is not needed. Just ask the question, and I am going to let her answer.

MR. HOFFMAN: I am just trying to enlarge the envelope so you see the envelope isn't being stretched.

MR. WOOD: The envelope, to be enlarged, is supposed to be under the rules by you making a showing of good cause and getting a court order.

MR. HOFFMAN: I am trying to do that. I am trying to prevent you from having to go in front of --

MR. WOOD: I am letting you ask it. Just ask the question.

MR. HOFFMAN: Okay.

Q. (By Mr. Hoffman) Mrs. Ramsey, were you at all concerned with the fact that your husband was attacked in your Atlanta home -- I don't know if you have one or two -- Atlanta home, and the security system had not been turned on?

MR. WOOD: I object to the form of the question. You may answer the question.

THE WITNESS: I was concerned when I learned that my husband had been physically attacked, yes.

Q. (By Mr. Hoffman) Were you concerned that the alarm system had not been turned on?

A. I did not know -- I was not at the home when all this happened, so I didn't know whether the alarm system was on or not.

Q. Do you know, were you told by anyone if the alarm system was or wasn't on at the time of Mr. Ramsey's assault?

A. I don't believe that it was on. You would have to ask him that.

Q. But that is your belief; is that correct?

A. Yes. It was midday.

Q. There was -- also I believe in your book you described an incident where you came back to your home in Charlevoix, and everyone was waiting in front of the house. I think Mr. Ramsey, in fact, describes this incident.

MR. WOOD: What page?

MR. HOFFMAN: I don't know if I marked that. What I may have to do is go back to this question after lunch, because I think that this may be one page that I didn't mark, and I will go back to it. I was just going to ask her if she recalled that particular event without having to reference it to the book. If she needs to --

THE WITNESS: Which event is that?

Q. (By Mr. Hoffman) In Charlevoix, there, I believe, is an incident where you recount where something happened to the alarm system, and I believe you and your mother and maybe other members of your family were waiting nervously outside for the alarm system people to arrive, and they didn't. And I believe John went looking through the -- I believe it was the Charlevoix home to see if there was an intruder. And I was just curious as to how that alarm system had failed, that security system.

A. I don't recall that part in the book.

Q. Well, after the lunch break, I just may bring you back very briefly to ask you if you have any memory of that by referring to it in your book there.

A. Okay. Thank you.

Q. Did you ever at any time make a statement to anyone, other than your attorneys, that you had written the phrase "Mr. and Mrs. Ramsey," which had appeared on one of the pads that the police found in your home, and has been referred to as the so-called "practice ransom note"?

MR. WOOD: Let me just, for the record -- are you stipulating that you have evidence that the phrase "Mr. and Mrs. Ramsey" was written on what has been called a "practice note"?

MR. HOFFMAN: No, I am not going to stipulate to that.

MR. WOOD: I think, if you are going to ask her about something, we ought to know exactly what you are referring to, because I am not sure that is correct at all.

MR. HOFFMAN: Fair enough. I didn't want to have to bring it in in a long-winded way. In order to properly ask this question, I am going to have to ask her a couple of foundational questions.

MR. WOOD: Sure.

Q. (By Mr. Hoffman) Mrs. Ramsey, did it ever come to your attention, through whatever source that is not privileged, like attorney-client privilege, that there may have been what the police have identified as "a practice ransom note" being written?

A. Yes, I have heard of "a practice ransom note."

Q. Now, can you tell me what it is that you heard was on that practice ransom note?

A. I don't know that I ever heard exactly what was on the practice ransom note.

Q. Did you at any time ever say to anyone, say, Pam Griffin, or someone like that, somebody you knew, that you, in fact, had written whatever was on the practice ransom note?

A. No, sir.

Q. Now I am going to ask you to look at your book here. And at page 210, it is right by the photographs. Right down here, you will see: "By now, anyone who knows John and me" -- just read the two sentences out loud.

A. "By now, anyone who knows John and me will agree that, if there is anything we avoid, it is the tabloids. When I pass the magazine rack in the grocery store, I literally try to look the other way."

Q. Is that an accurate statement of how you feel?

A. Yes, it is.

Q. Now I am going to ask the -- in fact, let me make sure. That was from page 210 of "the Death of Innocence," the paperback edition, that Mrs. Ramsey just read.

MR. HOFFMAN: I am going to have the reporter please mark this as Plaintiff's Exhibit for identification. And I am going to show you this.

(Plaintiff's Exhibit-12 was marked for identification.)

Q. (By Mr. Hoffman) Mrs. Ramsey, can you identify Plaintiff's Exhibit 12?

A. It looks like a Xerox copy of Editor & Publisher magazine.

Q. Can you tell me if you recognize the people in the photograph?

A. I certainly do. Lin Wood, my husband John, and myself.

Q. Do you remember sitting for that photograph?

A. Yes, I do.

Q. Do you know why that photograph was taken?

A. Yes, I do.

Q. Can you tell me why?

A. For this publication.

Q. For the purposes of being on the cover of the publication; is that correct?

A. I didn't know at the time it was going to be on the cover, necessarily, but yes.

Q. Did you have any idea of what the substance of the article in the publication would be about?

A. I believed it to be an article about Lin Wood.

Q. And did you have an opportunity to read the article when it came out?

A. When it came out, yes, I did.

Q. Do you remember what the article was about?

A. It was just about Mr. Wood's law practice.

Q. And would you say that this article is consistent with an attorney who challenges the media for misrepresentation?

MR. WOOD: I have got to ask you, Darnay, what does this have to do with anything in turn --

MR. HOFFMAN: Oh, it does. A lot -- I will --

MR. WOOD: Why don't you tell us succinctly what this article has to do with Chris Wolf's claims or the defenses to his claims in this libel action.

MR. HOFFMAN: Okay. It has to do with statements made in "the Death of Innocence," which I just had Mrs. Ramsey read.

MR. WOOD: We will answer questions about that.

Q. (By Mr. Hoffman) Because the next question is, given the fact that clearly you gave your support to your attorney for the purposes of this photo to appear on the cover of Editor & Publisher --

MR. WOOD: Don't. I asked them if they would have the photograph made because the request was made to me. Darnay, this is ridiculous. We don't need to go into this. Ask her about "the Death of Innocence." Is there a claim, Chris Wolf claim that he was libeled by this article or anything said in it?

MR. HOFFMAN: No.

MR. WOOD: Let's go to something else that has relevance.

MR. HOFFMAN: It goes to the issue of one of the stated purposes in the book. You have to understand, I have a right to know what purposes were involved in this book.

MR. WOOD: Why Editor & Publisher chose to write an article about my law practice and my cases has nothing to do with the purposes of John and Patsy Ramsey in writing the book "the Death of Innocence."

MR. HOFFMAN: Okay.

MR. WOOD: So let's move on to something that is relevant.

MR. HOFFMAN: I will try to connect it up. Please mark that Plaintiff's Exhibit 1 for identification.

(Plaintiff's Exhibit-1 was marked for identification.)

Q. (By Mr. Hoffman) Now, Mrs. Ramsey, I am going to ask you to look at what I have marked as Plaintiff's Exhibit 1 for identification and ask you if you recognize it.

A. No, I don't.

Q. I am going to ask you if at any time you ever gave an interview with The National Enquirer.

A. We spoke with a representative from The National Enquirer as part of some litigation we were involved with for Burke.

Q. Did you ever agree to be interviewed by The National Enquirer for publication?

MR. WOOD: Hold on. Tell me how this is relevant to the libel claims of Chris Wolf, whether John and Patsy Ramsey were interviewed by The National Enquirer.

MR. HOFFMAN: Because I am going to ask her about statements that were made in The National Enquirer which relate to the murder and the case. That is why I am asking her.

MR. WOOD: Ask her about the statements.

MR. HOFFMAN: I am going to first lay the foundation that, in fact, she --

MR. WOOD: I let you say she gave the interview. Why she gave the interview is not relevant.

MR. HOFFMAN: I want to ask her why.

MR. WOOD: I told you that is not relevant to any claim.

MR. HOFFMAN: You can't make that objection.

MR. WOOD: In the stipulation --

MR. HOFFMAN: You can direct her not to answer. I want you to direct her not to answer.

MR. WOOD: If you let me finish. Why do you want me to do that? You mean you came here with a plan to ask irrelevant questions?

MR. HOFFMAN: No, not at all. Quite simply because it is the proper form. I am going to ask the question to Mrs. Ramsey and ask her if she will answer it despite counsel's objection.

MR. WOOD: Let's set the ground rules right now. Mrs. Ramsey is going to follow the instructions of her counsel, and you are not going to ask her whether she will or will not.

MR. HOFFMAN: Oh, no, I will, and I will tell you why, Mr. Wood.

MR. WOOD: You may --

MR. HOFFMAN: I will tell you why, Mr. Wood.

MR. WOOD: You know, Darnay, you --

MR. HOFFMAN: I don't think you understand procedure.

MR. WOOD: I don't think you understand courtesy. Down here in the south, we don't interrupt people. You have interrupted me repeatedly.

MR. HOFFMAN: You are using manners as a ploy to avoid things.

MR. WOOD: Interruptions are interruptions.

MR. HOFFMAN: You have interrupted me many times.

MR. WOOD: Not repeatedly or intentionally.

MR. HOFFMAN: If you want to go back and count my interruptions of you, or Mr. Rawls in Mr. Wolf's deposition --

MR. WOOD: You weren't even there except by telephone.

MR. HOFFMAN: Yes. But the fact is that no counsel interrupted you --

MR. WOOD: This man asked proper questions. There was no need to have to go through all this kind of back-and-forth.

MR. HOFFMAN: You are wrong. You are out of order here, sir. You are out of order.

MR. WOOD: Darnay, Darnay, I am being patient with you.

MR. HOFFMAN: No, no, no. I am being patient with you. This is my deposition. This is not a forum for you to grandstand to look like a big shot in front of your clients. That is not what this is.

MR. WOOD: Darnay, Darnay, Darnay, I am not going to sit here and listen to that. You are not going to characterize what my efforts are for my clients in a deposition as grandstanding or otherwise. That is totally inappropriate. Look, I am trying to make an objection, and, if necessary, an instruction which at the beginning of this deposition we all agreed was appropriate if you went outside of areas relevant to the claims and defenses in the lawsuit. I happen to believe that, if the question you are trying to get to is why did John and Patsy Ramsey agree in the year 2000 or 2001 to an interview with The National Enquirer, that that is not relevant to the claims or defenses in this libel lawsuit. That was the question. I am going to instruct them not to answer. So why don't you just ask the question and leave off all this back-and-forth, and what I do think might be better to describe now as somewhat of an ad hominem attack, which is okay if you want to do it, but it is just a waste of all of our time.

MR. HOFFMAN: Mr. Wood, just to clarify one thing. I believe that, in the event that the judge were to issue an order for Mrs. Ramsey to compel her to answer certain questions, that the record must reflect the fact that she has refused to answer it, not that her counsel, because the judge will not be ordering you to answer it. They will be ordering Mrs. Ramsey. And unless the court is clear that it is Mrs. Ramsey who is refusing to answer the question and not yourself, I have to make that as a record. And that is the law, sir.

MR. WOOD: Darnay, please ask your question, and then I am going to instruct my client appropriately; and, if necessary, Judge Carnes will determine the law. Just ask the question, for gosh sakes. Let's get going.

Q. (By Mr. Hoffman) Mrs. Ramsey, do you know why you agreed to a National Enquirer interview?

MR. WOOD: I instruct you not to answer on the grounds that that issue is not relevant to any claim or defense in this lawsuit.

Q. (By Mr. Hoffman) Mrs. Ramsey, will you still answer the question?

MR. WOOD: I instruct you not to respond to that question. She will, in fact, follow her lawyer's instructions just as any client should appropriately follow her lawyer's instruction so that she does not waive any right she has to have Judge Carnes review this issue and rule appropriately.

MR. HOFFMAN: Can I take that as a no from your witness, that she will not --

MR. WOOD: You can take that exactly for what it is, my statement on this record. Next question, please.

Q. (By Mr. Hoffman) All right. Mrs. Ramsey, I am looking at this interview; and, actually, since we have two interviews, what I would like to do is give you an opportunity to review this interview because I am going to ask you questions about statements that you allegedly made in the interview. And since we have only a minute to go before we change, I think this would be an appropriate time to break and give you an opportunity to read the interview.

MR. WOOD: Whatever you would like to do.

MR. HOFFMAN: Okay.

THE VIDEOGRAPHER: We are off the video record at 11:35.

(A recess was taken.)

THE VIDEOGRAPHER: We are on the video record at 11:43.

Q. (By Mr. Hoffman) Mrs. Ramsey, I have shown you what has been marked Plaintiff's Exhibit, I believe, No. 13. Has it been marked? Yes. Plaintiff's Exhibit 1 for identification. Have you had an opportunity to review the document that I have handed you?

A. Yes, I have.

Q. I am now going to ask you again, do you remember giving an interview for The National Enquirer?

A. I remember talking with them as part of litigation we had with them concerning Burke.

Q. Now, I just want to ask you --

MR. HOFFMAN: Do we need to do that again?

THE VIDEOGRAPHER: No.

MR. HOFFMAN: Did you pick up the answer?

THE VIDEOGRAPHER: I picked it up. I picked it up.

Q. (By Mr. Hoffman) Just simply, I am going to hand you another copy, and I've highlighted just statements that The National Enquirer claimed you made just simply for the purposes of asking you whether or not you made that statement. I am not going to go beyond that. I just want to see if the Enquirer quotes are, in fact, accurate where you are quoted. If you will, look at the bottom of the first page. You will see they, quote, have you say, "He has never -- we have never talked about anything." Is that an accurate quote?

A. Who is the "he" they are talking about?

Q. Burke. I will read the paragraph before. The Ramseys were asked whether Burke, now 14, ever asked for details of JonBenet's death. Quote, He has never -- we have never talked about anything, said Patsy, who wore a purple suit and a white blouse.

MR. WOOD: What is the question?

Q. (By Mr. Hoffman) The question is, did you, in fact, say that, "He has never -- we have never talked about anything"?

MR. LIN: In that context?

Q. (By Mr. Hoffman) Is this quote accurate?

MR. WOOD: They may have spoken to her in an interview and taken bits and pieces out of context. I don't know --

Q. (By Mr. Hoffman) Is --

A. I don't remember whether I said that in conjunction with having talked to Burke or not.

Q. Substantively, is that accurate? Have you ever talked to Burke about anything regarding the JonBenet murder as they have stated here? I want to determine if that is accurate.

A. Yes, we talked about some things.

Q. So is the substance of that quote accurate or inaccurate?

A. Well, I may have said that, but it may not have been about talking to Burke or not. I don't -- I would have to see -- they take things out of context a lot.

Q. I just want to know what it is that they are taking out of context here. So again, I don't mean to belabor this. Did you or did you not, in substance, say that you never talked to Burke about anything to The National Enquirer?

A. I don't remember saying that.

Q. Now, turn to the next page, and you will see highlighted on the right, "When children are really tired and they don't go potty before they go to bed, sometimes they have accidents." One, do you remember making that statement to the Enquirer?

A. That sounds like something I may have said.

Q. Is it substantively correct then?

A. Yes, I believe so.

Q. Thank you. I draw your attention down a little but further where, quote -- I am going to read the paragraph just prior to your quote to put it in context. "Patsy, who is naturally right-handed, was asked if she can write with her left hand." "Can I write with my left hand," she said, pondering the question. A smile crossed her face, and she replied, "I can, but not very well." Did you make that statement to the Enquirer?

A. It sounds like something I might have said, yes.

Q. Is it substantively correct that you can write with your left hand, though not very well?

A. Well, I am not left-handed. If push came to shove, I could probably write something if I had broken my right arm, but I am not in the manner of writing with my left hand all the time, no.

Q. Have you ever told anybody at any time that you were ambidextrous?

A. No.

Q. That is all with respect to that. Thank you. Now, with respect to your book, I am going to ask you to turn to page 283. In fact, what I am going to do is I am going to exchange this and just show you the highlighted portion there. If you wouldn't mind, I would like you to read it to yourself and then read it out loud.

A. Okay.

Q. If you don't mind reading it out loud.

A. "For the first time I learned that someone had drawn a heart on JonBenet's hand. Who had drawn that heart? The killer? JonBenet? I doubted that my daughter had done so. Certainly, as a younger child, she might have drawn things on her hand, but at almost seven years old, she was beyond that stage, in my opinion. She cared about her appearance and was not likely to have done so. And if she had, she would have had to have drawn it with her right hand. Which hand was the heart on? I don't know the answer to that."

Q. I am going to ask you whether that was John or yourself making that statement in the book. Is that information from John or from you? Sometimes it becomes confusing as to one voice is and another is leaving off. It is for the purposes of asking --

MR. WOOD: Let me see if I can help cut to the chase. This is talking about the June 1998 interrogation or interview. Lou Smit interviewed John. Did he ever interview you?

THE WITNESS: No. It looks like maybe this was John's.

MR. WOOD: Looking at the next paragraph, it talks about, Darnay, the other people's picture was crossed out, but mine was circled. I think that is John's picture, so I think that probably answers it.

THE WITNESS: I think that is John.

Q. (By Mr. Hoffman) I am going to ask you whether or not you know personally whether or not JonBenet ever drew hearts on her hand or hands at any time when she was a small child.

A. When she was much younger, she did, but not in recent years, no.

Q. So would it be fair to say that you would be surprised if JonBenet had drawn a heart in her hand the day before?

A. Yes.

Q. Do you know whether or not JonBenet had either washed her hands or had either bathed or showered prior to going to bed that night at any time on December 25th?

A. I can't recall.

Q. If she had drawn a heart in her hand, do you think you might have seen it sometime during the day?

A. I may have. I don't remember seeing a heart.

Q. Are you surprised that the autopsy apparently indicates that there might have been a heart drawn in her hands?

A. Yes.

Q. Did you ever at any time tell anybody that you were in the habit or practice of drawing hearts in JonBenet Ramsey's hand --

A. No.

Q. -- just as a sign of affection?

A. No.

Q. I am going to give this back to you, and I will take that back. I would like to ask you, with respect to the beauty pageants regarding JonBenet Ramsey, were those pageants frequent or infrequent?

MR. WOOD: I am going to ask you to tell me what beauty pageants that JonBenet participated in have to do with this lawsuit. We have responded to your request for production of documents where you asked for, in number 21, "all documents concerning JonBenet Ramsey's involvement and participation in child beauty pageants," and we have stated in our response that we object because it was limitless in time and scope, unreasonable, and seeks documents with no relevance to the claims or defenses made in this lawsuit as JonBenet Ramsey's participation in beauty pageants is not at issue. You have not made any attempt to compel or respond to that or taken any issue with our position. I don't believe that JonBenet Ramsey's involvement in beauty pageants has anything to do with Chris Wolf or any of the claims that you make in your lawsuit.

MR. HOFFMAN: Are you objecting to the question, then?

MR. WOOD: If you want to do one of your explanations of how JonBenet Ramsey's participation in beauty pageants has anything to do relevancy-wise, if you could point me to the claim in your lawsuit or the defense that it is relevant to, that would help. Just give me a simple -

MR. HOFFMAN: It goes to the issue, again, of consciousness of guilt, impeachment for the purposes of witness testimony at trial. It would basically give us an opportunity if there is, in fact, contradictions in the answer. Basic things that all trial lawyers are trying to do when they are having depositions.

MR. WOOD: Hold on one second. I am going to give you some leeway on this issue in terms of questioning. Your question as I understand it is now asking her whether the pageants were frequent or infrequent. We will do it on a question-by-question basis, understanding that I think the relevancy here is tenuous at best. But I am going to give you the opportunity to go through it a little bit, please.

Q. (By Mr. Hoffman) I simply want to know whether or not, as her mother, you felt that the level of activity in beauty pageants was high or low, in your mind?

A. Low.

Q. Did you keep a room in the house known as the pageant room in your home in Boulder?

A. No.

Q. Did you keep a room where you kept all your trophies and all of JonBenet's pageant trophies in your home in Boulder?

A. She had some in her room, some in the play room and different places.

Q. I just have one other question. Did you at any time tell anyone that JonBenet was going to be the next Ms. America, or that she was being groomed to be the next Ms. America?

A. Well, she could hardly be the next Ms. America since she was only six years old.

Q. I understand. But at the time you were taking her to the beauty pageants, did you at any time say to anybody that you were grooming JonBenet to be the next Ms. America?

A. I don't know. I may have said something like that.

Q. If you don't know, fine.

MR. HOFFMAN: How are we doing with the time, gentleman?

MR. WOOD: A little before 12:00. We can push on if you want.

MR. HOFFMAN: How much before 12:00 are we?

MR. WOOD: Just a few minutes.

MR. HOFFMAN: Why don't we break.

MR. WOOD: If that is what you want to do.

MR. HOFFMAN: Is an hour adequate? We are not going to run more than, tops, two hours past the lunchtime, and it may not even be that much.

MR. WOOD: So 3:00. Whatever. We are here as long as you want us here.

MR. HOFFMAN: I understand. I am just giving you a rough idea so that everybody can be mentally out the door around that hour.

MR. WOOD: Is there any chance you would like to go ahead and take John to see if there is a chance you can finish him later today.

MR. HOFFMAN: I haven't finished my preparation. I would like to start fresh in the morning and just review the answers.

MR. WOOD: I just want to make that offer to you. Okay.

MR. HOFFMAN: Thank you very much. It will be just a little bit longer than just a couple of hours before the end of today.

MR. WOOD: Okay.

MR. HOFFMAN: And thank you very much.

MR. WOOD: All right.

THE VIDEOGRAPHER: Off the video record at 11:55.

(A recess was taken.)

THE VIDEOGRAPHER: We are on the video record at 1:03.

Q. (By Mr. Hoffman) Mrs. Ramsey, I am going to ask you if you can tell me who Chris Wolf is. Do you know who Chris Wolf is?

A. Yes. He -- yes, I can tell you who he is. He is a suspect in the murder of our daughter.

Q. When you say "a suspect," how do you know he is a suspect in the murder of your daughter?

A. Well, I understand that the police had him as a suspect early in 1997, and his girlfriend is, I believe, the way we came by his name.

Q. Do you know why his girlfriend came to your attention?

A. Yes. She called and said that she believed that he was the murderer.

Q. Do you know who she called?

A. She called my parent's home.

Q. And do you --

A. I believe she had tried to call the Boulder Police Department, but they had not returned her calls.

Q. And do you know who it was that she spoke to in your family with respect to --

A. I think initially she spoke with my mother and then I believe my sister.

Q. Do you know the substance of what she said to your mother?

A. Generally, she said that she was his girlfriend. She -- he came home to her residence. Apparently, they were living together. He came home late in the middle of the night, changed his clothes, and acted very strangely the next morning when he saw the things were being reported.

Q. Now, did you just say earlier in your answer that she had been attempting to contact the Boulder police but had been unsuccessful, and, therefore, was contacting your parents for that reason?

MR. WOOD: I object to the form of the question. It misstates the witness' testimony.

MR. HOFFMAN: Can I have a read back with respect to the answer?

MR. WOOD: I can tell you. "I believe she had tried to call the Boulder Police Department, but they had not returned her calls." I don't think that means she had not ever spoken with them or been unsuccessful.

MR. HOFFMAN: I see. I was about to ask her if she could clarify whether she knew the calls were being returned because they had never spoken to her.

THE WITNESS: I don't know. I just know that she apparently had made an attempt to reach them.

Q. (By Mr. Hoffman) Do you know what your parents did with the information that -- or the person that spoke to her on the phone, your parents' phone, what they did with that information? Did they call anybody?

A. Well, I think they told us about it.

Q. Do you know who they told? Not revealing any attorney-client privilege.

A. Well, I don't -- somehow in the chain of events, we found out about it, alerted our investigators about it, and then I don't know what happened after that.

Q. Do you remember when you first heard about Chris Wolf as a potential murder suspect; you personally?

A. I can't remember exactly, no.

Q. Was there any discussion when you wrote your book, "the Death of Innocence," over Chris Wolf being included in the book? Do you know if you had any discussions about that, you, yourself, with any of the people that were writing the book with you?

A. Yes.

Q. Can you give me the substance of what those discussions were?

A. I remember Janet Toma, the editor, saying that she thought we should speak to a lot of the untruths that had been imparted in other books or -- like, specifically, Steve Thomas' book, and "The Perfect Murder, Perfect Town," or something like that. That book. And she said Chris Wolf

had been mentioned a lot in the media, and she felt like we needed to speak to that as well as other myths.

Q. Did you agree with that suggestion, you personally?

A. Well, I remember -- I remember John 1 and I both saying that, you know, that -- we kind of said, Well, are you sure we should really go into all that detail? And she said, Absolutely. She felt the readers wanted to know any untruths that we knew of and could refute.

Q. What was the untruth in the issues involving -- or the Chris Wolf's involvement in the case that you were trying to clarify? What was the untruth in reporting that Chris Wolf was a suspect? What was your editor and what were you trying to clarify by reporting that in your book?

A. Well, I don't know that that was an untruth. I think she was just saying that he, his name, had been brought up quite a number of times, as had Bill McReynolds and Linda Hoffman-Pugh. Those were kind of the names being bantered about in the media and other publications, and she felt like we needed to

speak to those, talk about Fleet White, talk about just names and incidents that were sort of the no footprints in the snow, all those little urban legends we called them.

Q. What was the urban legend about Chris Wolf that you were trying to clarify?

MR. WOOD: I am going to object to the form. I think you all may be missing each other. I think she is talking about dealing with myths and urban legends and addressing individuals that had been talked about, and you are saying that it is one in the same. That may be what she is saying, but I don't think she means that. If you are misunderstanding, maybe you all can clarify what you are talking about, Patsy.

MR. HOFFMAN: Okay.

THE WITNESS: Well, the editor said that she felt like we should -- that anything that had been already out there in the public, that we should talk about anything that we knew about that so that there wasn't -- I mean, Chris Wolf's name was not an urban legend. That was a true statement, that he had been a suspect, you know.

Q. (By Mr. Hoffman) Do you feel like he was fairly a suspect?

A. Was he "fairly a suspect"?

Q. Yes. Do you feel it was fair that he was a murder suspect or had been discussed as one?

A. From what I know about his background, yes, I do.

Q. Do you feel that, in the other media that your editor was referring to, like "Perfect Murder, Perfect Town," whatever, that there was anything you needed to correct in the way of misinformation?

A. I had never read that book, so I don't know. I can't say that specifically. She just said that his name had been mentioned, so we just -- you know, she wanted us to address that.

Q. Were you ever given an opportunity to look at any evidence that would implicate Chris Wolf in this crime; you, personally, given any evidence or an opportunity to look at any evidence, without telling me what it was, did your investigators come to you and say, We have evidence concerning Chris Wolf?

MR. WOOD: You are asking her now to go into what would constitute attorney-client privilege or work product privilege, I think. Anything other than what you may have learned from your attorneys' investigators or your attorneys, he is entitled to know; otherwise, I think he would agree it is privileged.

Q. (By Mr. Hoffman) I want to know if you were ever shown any evidence, without identifying who showed it. Just from the group of people you are associated with in helping you solve the crime, did anyone within your own group show you evidence of Chris Wolf's involvement, without identifying who the people were that showed it to you? Just in a general way, did you ever see a file involving -- about Chris Wolf's involvement in the crime that may have been prepared for you by somebody working for you?

MR. WOOD: Or that might have been prepared by someone working for her regardless of who it was prepared for.

MR. HOFFMAN: Yes.

MR. WOOD: Do you understand what he is asking you?

THE WITNESS: Not quite.

Q. (By Mr. Hoffman) I have to tread a fine line here.

A. You are saying the evidence --

Q. Did you ever see anything, any writing --

A. I had seen some of his effects; is that what you are saying? Yes, I have.

Q. Or anything that was purported to be evidence pointing to Chris Wolf as a potential murder suspect, have you ever actually physically seen any of that yourself?

A. I have seen some of his personal effects, yes.

Q. Were these personal effects meant to show that he might, in fact, be a murder suspect or be someone who could have killed your daughter?

A. I believe so.

Q. I have one sort of quick question here. Did your sister Pam ever tell you that she knew who the killer of JonBenet Ramsey was?

A. No, she didn't.

Q. Never made a statement like that to you?

A. Not emphatically like that. She has given me her opinion of who she thought might be this or that.

Q. Did she tell you who, in her opinion, she thought was the killer?

A. Yes.

Q. Can you name the person in question or persons that she thought were the killer, was or were the killers?

A. Could I?

Q. Yes.

A. Yes, I could.

Q. Would you?

A. Well, she has named several people.

Q. Could you just give me their names?

THE WITNESS: Is that appropriate?

MR. WOOD: Let me ask you, Darnay, what possible relevance could it have? I don't know if Chris Wolf is one of them or not. You could ask that, I think, but what possible relevance could it have to your claims to go into the issue of who her sister says she believes might be the killer?

MR. HOFFMAN: Well, because her sister actually made statements that got reported in the media to the effect that she knew who the killer was, in fact, had seen that person only recently, and I was wondering whether or not she had ever made that statement around Patsy, a statement like that, and then identify --

MR. WOOD: Why don't you take her deposition to find out what she was talking about. I think that would be more appropriate.

MR. HOFFMAN: I will take that under advisement. Thank you.

Q. (By Mr. Hoffman) Okay. Back to the issue of Chris Wolf. Do you know whose decision it was, when your book "the Death of Innocence" was bound in hard cover and ready to sort of be given to the media, who decided to issue press releases to the effect that the book would name murder suspects, your group of murder suspects?

MR. WOOD: When you use the phrase "would name murder suspects," are you equating that with the book stating the identities of individuals who had previously been identified as murder suspects? Because I don't know of anyone who was, quote/unquote, named a murder suspect as if that was the first mention of that person in that book. Do you understand the difference I am asking?

MR. HOFFMAN: I understand.

MR. WOOD: Because I think it is a fair question to clarify.

MR. HOFFMAN: Absolutely.

MR. WOOD: Thank you.

MR. HOFFMAN: I am going to try and ask it. I may have to ask it in multiple parts with a yes or no.

Q. (By Mr. Hoffman) When you were preparing your book, did you think there might come a time when the book was released that the names of the people that were discussed as possible murder suspects, either by yourself or by law enforcement authorities, might actually become public knowledge in the publication of this book?

A. Well, if their names are in the book, it was going to be public knowledge.

Q. Do you know who made the decision to advertise this book as naming -- well, actually, I think the colloquial is, The Ramseys name their murder suspects.

MR. WOOD: Where is this?

MR. HOFFMAN: Not in here. It was in media that was circulating around the time.

MR. WOOD: I don't think we can speak to whatever media was circulating. The bottom line is, Darnay, they identified people that had already been identified as suspects, and they discussed them. Let me finish. And you are trying to ask her about some, perhaps, misinterpretation or some interpretation circulating in the media that they were for the first time going to identify suspects. And I don't think it is fair to do that unless you show her what you are talking about, and then she can answer the question, and then she will answer the question.

Q. (By Mr. Hoffman) Actually, really all I want to know is who was responsible for deciding how to promote this book in the media when it came out. Do you know who the individual was that made that decision?

A. I would say the people at Thomas Nelson publishers.

Q. Was there any specific person that you know of personally that was going to be making those decisions or did make those decisions on how to promote the book?

A. It is a large company. They have a marketing department. I don't know.

Q. So you were never introduced to anybody in the marketing or promotional part of Thomas Nelson who discussed the promotion of this book with you, you, personally, that said, This is what we are going to do or not going to do?

A. I don't remember having those specific discussions, no.

Q. So you weren't actually asked for your advice with respect to any of the marketing of the book; there was no discussion between author and the marketing or promotion part of it?

A. Not that I remember, no.

Q. Thank you. Now, with respect to Steve Thomas --

MR. WOOD: Hold on.

(Deponent and her counsel confer.)

MR. WOOD: Let me ask you, Darnay, because I don't think Patsy understood. When you used the term "marketing and promotion," I interpret that as meaning you are including, perhaps, discussing with them the interviews that they were either considering or actually being -- or actually giving.

MR. HOFFMAN: Just an overall.

MR. WOOD: I don't think she got that part because --

THE WITNESS: I was thinking like advertising.

MR. WOOD: Like advertising in the newspaper and things. You may want to rephrase that again including press interviews.

THE WITNESS: We had discussions about where we were doing press interviews, but not about print advertising or something like that.

Q. (By Mr. Hoffman) Then did there really ever come a time when you were preparing your book for publication that you had occasion to talk at Thomas Nelson, or with anyone Thomas

Nelson might have hired to help in this area involving media interviews such as print interviews, radio interviews, television interviews, anything like that? Were you brought into any discussions involving that?

A. Yes.

Q. Were you given approval, the right to approve or disapprove of any of those interview vehicles?

A. I think the final decision fell with Thomas Nelson, probably.

Q. In your media interviews or whatever, were you ever told that there were areas that you could go into or not go into by anybody at Thomas Nelson when you talked in your interviews?

A. No.

Q. So that if you chose in an interview to name an individual or not name an individual who appeared in this book and who may or may not have been named as a source in other books, that the discussion of that individual, you weren't told not to talk about anybody that was named in the book, meaning that no one said, Don't talk about Chris Wolf in your interviews, or, Don't talk about anybody that is a potential murder suspect?

MR. WOOD: Object to the form of the question as being multiple in nature.

MR. HOFFMAN: Okay.

THE WITNESS: Did they tell me? What are you asking me? Did they tell me what to say or not to say?

Q. (By Mr. Hoffman) Did they say there were areas you really shouldn't discuss --

A. No.

Q. -- in your media interviews? So any decision to, say, discuss Chris Wolf or Linda Hoffman-Pugh, or mention in your interviews, that was a decision you made for yourself in doing the interview?

A. During the interview?

Q. Yes, during the interview.

A. Yes.

Q. So no one coached you or encouraged you to make statements like that; they were made voluntarily by yourself?

A. In answer to an interviewer's question, yes.

Q. That is all I wanted to establish. Thank you. Now, this may be one of the last topic areas I go into today with respect to your deposition. I am going to ask you if you are familiar with Steve Thomas' book, "JonBenet"?

A. I know he wrote the book. I have not read it.

Q. And this may be a subject of discussion for Lin and I. He may or may not object to it. We will see. Since you haven't read it, what I wanted you to do was to have an opportunity to read -- you can review it. You can take whatever time you want to just simply read three or four pages of his book where he, in effect, outlines his theory of what happened that night. Because then I would like to be able to ask you, for the record, whether or not any of these statements are true or false.

A. You can go ask me the questions. I generally know his theories.

MR. WOOD: Let me say this to you, Darnay. Are you referring to --

MR. HOFFMAN: In the paperback, it is 318.

MR. WOOD: Excuse me. In your client's request for admission number 108, you set forth, I thought, in verbatim quotations, Steve Thomas' description or theory of the case and asked my clients to admit or deny whether that was an accurate statement of the passages from the book, which they admitted. What I would say is we know they have been forced to look at that by virtue of responding to your request for admissions, even though they didn't look at it in the book proper. Why don't you just go ahead and ask her specific questions, and let's leave Steve Thomas' book to Steve Thomas' lawsuit because he has enough to answer for that himself without her answering for him.

MR. HOFFMAN: No. I understand. All I wanted to do is just simply, because it is one thing to simply say yes, you admit for the purposes of request to admit that these statements were made in the book.

MR. WOOD: Sure. She read it. She has a general familiarity with it because you included it in your request to admit. So I would ask you to go ahead and ask her specific questions. And, like I said, let's leave Steve Thomas' book to his lawyers to worry about. As I say, they have their hands full on that one. We don't need to get into that today. Why don't you ask her specific questions about the murder of her daughter, the death of her daughter, factual questions about what may or may not have been done, et cetera. **A.** She will answer any question you have in that regard.

MR. HOFFMAN: I had just basically wanted her to review it before I asked her --

MR. WOOD: I don't believe it is necessary because we are not going to test to the truth or falsity of Mr. Thomas' book. We will test her knowledge about factual issues related to the death

of her daughter. That is why I don't want to put it in the context of Mr. Thomas' book, which we, as you know, clearly contend to be libelous.

MR. HOFFMAN: Okay. I am just going to need a minute to make sure I go into relevant areas rather than irrelevant areas.

MR. HOFFMAN: All right. What I am going to do, rather than -- because I think most of what he talks about is not factual. It is more his subjective interpretation of evidence, and I can't ask her whether his subjective interpretation is true or false. I am going to ask her if she read the complete statement. And then ask her whether or not she, in fact, was involved in any way in the murder of her daughter, as Steve Thomas -- because I think these statements speak for themselves as far as his hypothesis. She doesn't know how to test a hypothesis. I am not really asking her to do that.

MR. WOOD: The question of whether Steve Thomas' statements or hypothesis are factual, capable of being proven true or false, is not an issue for us to debate today, and I think you understand that.

MR. HOFFMAN: That's right. Yes.

MR. WOOD: She is not here to test Steve Thomas' hypothesis or factual representations --

MR. HOFFMAN: I agree with that.

MR. WOOD: -- whatever the case may be. She is here to answer any question. And I want to say this to you without any doubt in your mind of what I am telling you, Darnay. She is here to answer any question, any question that you have that asks her about factual information relevant to the death of her daughter. So you have the opportunity today for however many hours you have left under the federal rules to ask her anything about that. She is prepared, ready, and willing and able to answer any of those questions. So that is what I would like you to do. Let's go at it that way. You fire away, and she will answer them.

Q. (By Mr. Hoffman) One of the most controversial pieces of evidence is a red Boy Scout knife or a whittling knife. I don't know if it is a Swiss Army knife. Do you know whether or not Burke owned a red knife at any time?

A. He had a couple of them.

Q. He had more than one?

A. I believe so.

Q. Do you know if he had more than one at one time?

A. Yes.

Q. So it wasn't like he owned one and then lost it and then owned another one?

A. Oh, well, I don't know that exactly. I guess he has had a couple of them in his life. I don't know that.

Q. Do you know the whereabouts of that knife on Christmas day?

MR. WOOD: Which one?

MR. HOFFMAN: The red knife that I was just referring to.

MR. WOOD: She said he had a couple.

Q. (By Mr. Hoffman) Do you know the whereabouts of either one of those knives?

A. No.

Q. There is apparently a kitchen knife found.

MR. WOOD: Kitchen knife found where?

MR. HOFFMAN: Found at the scene of the crime somewhere in the kitchen, or whatever.

MR. WOOD: That would be news to me.

MR. HOFFMAN: Okay. All right.

MR. WOOD: I don't know what you are talking about. If you can, help me. If the question is, Did you have kitchen knives --

MR. HOFFMAN: I know she has kitchen knives.

MR. WOOD: But when you represent, please, when you represent something as being evidence, I just have to make sure that that is just not --

MR. HOFFMAN: I am not saying any of this is evidence.

MR. WOOD: -- made up out of whole cloth because the tabloids said it was evidence. Most of that doesn't exist.

MR. HOFFMAN: I want to know what she knows is and isn't.

Q. (By Mr. Hoffman) Let me ask you this question. Are you a coffee or a tea drinker, generally?

A. I drink both.

Q. In the mornings, when you prepare yourself for the day, generally what do you have, coffee or tea?

A. Usually coffee.

Q. Could you just describe what would be a typical weekday for you when you get up in the morning?

MR. WOOD: Now or back in 1996?

MR. HOFFMAN: I am sorry. In 1996.

Q. (By Mr. Hoffman) Just a typical weekday morning. Who would normally get up first in the morning? Was John generally an early riser? Did you get up beforehand, that sort of thing, go down and make coffee?

MR. WOOD: Are we talking about a typical Monday through Friday where the kids are in school?

MR. HOFFMAN: Right, nobody on vacation.

MR. WOOD: John was going to work?

MR. HOFFMAN: Uh-huh (affirmative).

MR. WOOD: Can you do that, Patsy? Do you understand what he is asking you?

Q. (By Mr. Hoffman) Can you describe it?

A. Just in general, get up, get the kids ready for school. He would go to work. I would do things around the house or shopping or school volunteer work and pick up the kids. And that was about it.

Q. When you would get up in the morning, would you just generally dress first and go down and start preparing meals for the family, or would you go down, prepare the meals first, and then go get dressed?

A. It was probably no set pattern, but usually I would dress first.

Q. I am sorry, you would dress?

A. I would usually get dressed.

Q. Before you would go down to the kitchen to prepare meals?

A. Yes. Usually. I can't say for sure, but --

Q. But --

A. Usually.

Q. Your best recollection. And then after you had dressed and gone downstairs, normally what was the meal preparation like for your family?

A. The kids would usually have cereal, I think, before school. Oatmeal sometimes, fruit, Pop Tarts, whatever was around.

Q. And you were generally dressed for the day by that time; and when that was done, then I just take it that you would just go about your business for the rest of the day, whatever that was?

A. Yes.

Q. Did you ever prepare meals in a more informal way in the morning, like go down in like, say, a black housecoat with something that might have like rose color flowers on it, that sort of thing? Ever prepare meals in the morning informally?

A. Oh, I probably -- I don't know about the rose color robe you are talking about, but --

Q. The black robe with rose colors, or anything like that.

MR. WOOD: Or anything like that?

MR. HOFFMAN: Or any type of clothing like that.

MR. WOOD: What do you mean when you say any clothing like --. Like a black robe with red roses, pink roses?

MR. HOFFMAN: Linda Hoffman-Pugh once identified her as --

MR. WOOD: Why don't you just be direct and ask her the question did she own such a robe and had she ever worn it. Go right ahead.

Q. (By Mr. Hoffman) Did you ever own a black housecoat with pink roses on it, or a black robe? I don't know if it was a housecoat or how you would describe it. I don't know how women identify these types of informal garments.

A. I can't remember. I know I have a white one with pink roses. I may have. I can't remember. I had a lot of robes.

Q. With respect to JonBenet, was pineapple a favorite meal of hers?

A. She liked fruit, in general.

Q. No particular fruit?

A. Just most any fruit.

Q. And was that a preference for Burke also, fruit, like his sister?

A. He liked it -- he likes fruit, but not as much as she did.

Q. Do you know if JonBenet would play in the basement area?

A. She did not play much in the basement.

Q. Did she ever express an aversion to playing in the basement area?

A. An aversion?

Q. Yes.

A. No.

Q. What was the basement area generally used for in the house?

A. Burke had a train set up in one area of the basement. There was -- and generally the rest of it was for storage of seasonal decorations, art supplies, school project supplies, that kind of thing.

Q. So if you didn't know what to do with something in the house, you would just take it down, have it sent down to the basement. Was that the general storage area for things?

A. Largely, yes.

Q. Because Linda Hoffman-Pugh told me that if you didn't know what to do with something in the house, you would always say, Take it to the basement; that was a favorite phrase of yours?

MR. WOOD: Are you asking her whether Linda Hoffman-Pugh told you that or --

MR. HOFFMAN: No. Whether that is, in fact, a favorite phrase of hers.

MR. WOOD: Let me ask you so that the record is clear, would you rephrase it so she will know exactly what you are asking her.

Q. (By Mr. Hoffman) Was the phrase "Take it to the basement" a favorite phrase of yours if there was something in the house that you didn't know what to do with?

A. I can't say what is a favorite phrase or not. I am sure I don't know what that is.

Q. Frequently, the solution to any problem about where to take or store anything in the house.

A. Probably so.

Q. With respect to the day in question, whose decision was it to call the police when you found the ransom note? Do you remember?

A. John and I, we just said, "What do we do? Call the police." I don't know if it was specifically one's decision or the other.

Q. Whose idea was it to call all the people that eventually arrived, your friends, your whatever, that came afterwards?

A. Oh, I did that.

Q. Can you tell me why you did that?

A. It just seemed instinctive. It was just kind of a very stressful time, and I just called on friends.

Q. Had you read the ransom note by that time?

A. I don't think I had read all of it, no.

Q. Were you aware that there was a part in the ransom note where you were told not to contact authorities?

A. I think I read that later.

Q. Did you think that there might be a chance that, if you called a group of people over to the house and it was being observed, that the kidnappers might, in fact, see that you had disobeyed the condition of their ransom note?

A. Well, that just didn't go through my mind at that time.

Q. Were there any -- I am going to withdraw that. I don't know if it is going to be relevant. What I am going to do, because I don't think there is very much more about that particular day that I really want to go into that you haven't already given in the way of statements that I have received. I just want to clarify a few things. Lin has been very forthcoming in giving me discovery and whatever, so rather than rehash all that, I just wanted to address a few questions. I am going to close the deposition by asking you one question. It is just I feel I am obligated to do it, and then we are going to end the deposition unless there is something Lin wants to add. I am just going to ask you a question. Mrs. Ramsey, did you write the ransom note that was found on December 26 at your Boulder home?

A. I believe you have already asked me that, and I said I did not write the ransom note, no.

Q. I am just asking. Did you have anything to do with the death of your daughter?

A. No, sir, I did not.

MR. HOFFMAN: Thank you. I am finished.

MR. WOOD: For the record, I mentioned to you, Darnay, during the break that I think there has been, correct me if I am wrong, one instruction on my part to Mrs. Ramsey not to answer a question. Am I right?

MR. HOFFMAN: Yes.

MR. WOOD: That question went to making inquiry of her as to why she and her husband granted an interview to The National Enquirer. Since the last thing I want to do is to fight a motion battle over that, and because I have been consistent throughout in my representation of the Ramseys, as I think they have been even before I was involved in terms of trying to answer every question, if you will agree that we are not waiving any right to the question of relevancy in allowing her to answer that question, I am going to let her answer it, and effectively withdraw with that understanding my objection and instruction. Is that okay?

MR. HOFFMAN: That is fine.

MR. WOOD: So with that agreement, if you would like to ask her; and if, Patsy, you would answer the question for him, please.

MR. HOFFMAN: I am going to formally ask it.

Q. (By Mr. Hoffman) Mrs. Ramsey, I showed you a document that was identified as Plaintiff's Exhibit 13. I am going to show that document to you again. Could you identify what it is that that document purports to be?

A. They are copies from a tabloid article, National Enquirer tabloid article.

Q. Would you characterize the statements that you made in this article as being statements that were made in the course of an interview, formal interview with The National Enquirer?

A. It was an interview in conjunction with some litigation for Burke that we were involved with.

Q. If it was --

MR. HOFFMAN: See, this is why it is a tricky area because for litigation, I don't want to go into what the litigation was about, and, naturally, if she gave it for the purposes of the litigation, then she is required to by law.

MR. WOOD: No, it was not given as a requirement of the litigation as a matter of law.

MR. HOFFMAN: Oh, okay.

MR. WOOD: But I think what she is saying is that the issue about the interview came up in connection with actually the resolution of some of Burke's claims.

MR. HOFFMAN: Because I don't want to get into it if this is part of the settlement. If that is really what she is going to say, that she agreed to this interview because it was part of a settlement agreement --

MR. WOOD: I don't think that is what she said.

THE WITNESS: I agreed to the interview because, I mean, we are not afraid to face even our most vile opponent, of which I consider The National Enquirer to be one of the most vile. And, you know, we have faced Steve Thomas. We have faced The National Enquirer. We have nothing to hide. And I am facing you today, Mr. Hoffman. I did not kill my daughter, I did not write the ransom note, and I don't know who

1did either of those things. And I am not afraid

1to answer any questions from either you or from

them or from the police department or from anyone

1else, for that matter. And that is why the

1interview was taken.

MR. HOFFMAN: Okay.

Q. (By Mr. Hoffman) The only reason I had asked it was in relation to a statement that was made in the book about how disapproving you were of the tabloids, and --

A. And to this day I disapprove of the tabloids.

Q. And also, I believe Mr. Ramsey once stated that it was his intention to see that, if anything came out of this case, it would be a change in the way in which the media reported certain news. And I was just wondering why, after these strong statements of principle, that you basically were willing to give a tabloid an interview. That is all, my only reason for asking that.

A. Because we wanted to prove that we have nothing to hide and that we can sufficiently face our most vile opponent.

MR. HOFFMAN: Okay. Thank you very much. Lin, I have no further questions.

MR. WOOD: One second. So that we are clear, because you have obviously done a good job of economically handling the time, despite some of the colloquy earlier in the day, it is clear on this record that you are completing well within the maximum seven hours allowed by --

MR. HOFFMAN: Yes.

MR. WOOD: -- the Federal Rules of Civil Procedure. You understand we are willing to sit here for the remainder of the afternoon --

MR. HOFFMAN: I understand.

MR. WOOD: -- for however many hours and answer any questions?

MR. HOFFMAN: Absolutely.

MR. WOOD: Now that we made our one change of heart, you understand, Mr. Hoffman, that we have answered every question, Patsy Ramsey has answered any question you have put to her and expressed a willingness to stay for several more hours and answer any other questions; right?

MR. HOFFMAN: Well, I do know that I would have to review the transcript. You made certain objections over and above the objection with respect to that, and there was an ongoing colloquy between the two of us.

MR. WOOD: We have that transcript available on this computer, and I want to make sure, because you have come a long way from New York, and there are a lot of lawyers that are here today to make sure that Chris Wolf and his attorneys have had every opportunity to ask any question relevant to the claims or defenses in this case. And if you are representing that you have now done so to your satisfaction, then the deposition is, in fact, complete.

MR. HOFFMAN: Again, it is subject to --

MR. WOOD: If there is any --

MR. HOFFMAN: -- any review.

MR. WOOD: -- issue you want to look at now, we don't mind taking a break, turn my computer around, you can scroll through the entire deposition, and if there is a question, she is here. We can come back after the break, and you can clarify it.

THE WITNESS: Let's do that to make sure.

MR. WOOD: I would rather take the time today to make sure that you are done and not take any chance that we would have to come back and put together this type of a force of people.

MR. HOFFMAN: I really don't foresee that there is any area.

MR. WOOD: That is all I wanted to know.

MR. HOFFMAN: And, Mr. Wood, I wanted to tell you that at lunchtime, in light of our earlier discussion, I felt that, given -- I had a chance to review all of the, which was quite substantial, the discovery documentation, and in doing that, I realized that a lot of what I would be asking had been an asked-and-answered situation, and there was simply no reason to subject Mrs. Ramsey to answer questions and answers that she has already given on other occasions.

MR. WOOD: In fact, you have been provided with complete transcripts of the April 1999 police interviews, of the June 1998 police 1and district attorney interviews, and of the August 2000 police interviews; we have given those to you.

MR. HOFFMAN: Yes, absolutely.

MR. WOOD: And I think you would acknowledge, as she did today for you, she did in every one of those, she answered every question; didn't she?

MR. HOFFMAN: I believe she did, to the best of her ability.

MR. WOOD: All right. Deposition concluded. Thank you very much.

MR. HOFFMAN: Thank you, Mrs. Ramsey, for coming.

MR. WOOD: Let's go back on. Are we back on? One thing I do want to make clear, because this has come up in other depositions, in whole or in part, and I want to state it now so that there is no doubt about it being something that even has to take a moment's reflection. Subject to the court reporter's need to coordinate the videotape with the stenographic transcript, the written transcript, which I understand takes some time in order to ensure complete accuracy, I want to state that, on behalf of the Ramseys, this deposition shall not be deemed confidential. No part of this deposition will be deemed confidential. My clients are perfectly willing for this entire deposition, either in the written stenographic form or in the videotape form, in its entirety, to be made public. And we make that statement unlike any other witness in this case. Every other witness has claimed confidentiality in whole or in part. We claim no such confidentiality. We are willing to let anyone that wants to see it in its entirety see it. So with that statement, then we are completed.

MR. HOFFMAN: With that statement, that means that when the videotapes are -- do you need to review the videotapes before?

MR. WOOD: No. I have made my statement without the necessity of reflection or review. The Ramseys are willing to allow this deposition to be made public in its entirety. The only delay, as I understand it, in being able to do that is for the videographer and the stenographer to review the transcript in writing and the videotape to make sure that there is a coordinated and accurate transcript. Once that process is done, whoever would like to see this deposition in video or to read it in writing, the Ramseys make no claim to confidentiality.

MR. HOFFMAN: Fine. Thank you. And thank you once again, Mrs. Ramsey.

THE VIDEOGRAPHER: We are off the video record at 1:45.