



THE COURT: Next witness, please.

MR. MACKEY: We'll call Eric Thompson.

THE COURT: Thank you.

THE COURTROOM DEPUTY: Would you raise your right hand, please.

(Eric Thompson affirmed.)

THE COURTROOM DEPUTY: Would you have a seat, please.

Would you state your full name for the record and spell your last name.

THE WITNESS: Eric Howard Thompson, T-H-O-M-P-S-O-N.

THE COURTROOM DEPUTY: Thank you.

THE COURT: Mr. Orenstein.

MR. ORENSTEIN: Thank you, your Honor.

DIRECT EXAMINATION

BY MR. ORENSTEIN:

Q. Good afternoon, Mr. Thompson.

A. Good afternoon.

Q. Could you tell the jury where you live, please.

A. Oklahoma City.

Q. And it appears by your uniform you're with the Oklahoma City Police Department.

A. Yes, I am.

Q. What is your rank there?

Eric Thompson - Direct

A. I'm a sergeant.

Q. How long have you been with the police department?

A. Almost 10 years.

Q. Sergeant Thompson, were you on duty the morning of April 19, 1995?

A. Yes, I was.

Q. And did you hear an explosion that morning?

A. Yes, I did.

Q. Can you tell the jury what you did after you heard the explosion?

A. Yes. I was on the 3d floor of the police station, which is approximately three blocks away from the Murrah Building site, and we ran up on the roof to see what had happened. And we saw the column of smoke going up from the area of the Murrah Building, and I immediately ran down to my scout car -- scout car which was parked directly in front of the police station and drove to the west side of the Murrah Building.

Q. What did you see when you got there?

A. A lot of smoke, debris in the road, and I noticed people crawling and stumbling down the steps of the plateau area -- plaza area.

Q. Did you try and help the people that you saw there?

A. Yes, I did. The first lady that came to my attention, her right arm had been broken and was hanging at a -- a right angle, and she was holding it and limping down the steps. And

Eric Thompson - Direct

I -- I was able to help her into the front seat of my scout car. There was another gentleman in an Army uniform, Class A or Class B uniform, and he had a -- a bleeding head wound. And I was able to place him along with two others in the back of my police car, and I immediately drove them to St. Anthony's Hospital, which is to the northwest about three blocks.

Q. Did you return to the scene from St. Anthony's?

A. Yes, I did. I unloaded these people at the emergency room at St. Anthony's and drove back to the street, back to the bomb site. And my tire on my police car hit some debris and was flattened about half a block from the northwest corner of the Murrah Building.

Q. Did you just leave the car there?

A. Pulled the car over to the side of the road, and I ran up the street to the northwest corner of the Murrah Building.

Q. Now, were there a number of other people that you tried to help that day?

A. Yes, there were.

Q. I want to ask about one in particular. When you returned to the scene of the Murrah Building from St. Anthony's, did you see somebody in a window on the 3d floor?

A. Yes, I'd run around to the south side of the Murrah Building because I knew where the day care had been, and I saw my lieutenant. And he asked me where the day care was, and I ran immediately there. And upon arriving at the south side of

Eric Thompson - Direct

the Murrah Building, the door that I knew that led to the day care was blocked, and there were people attempting to get rubble out of that -- that doorway. And I looked up to my right, and there was a man in the window. I guess it would be the 3d floor. And a police officer, Sergeant Ed Moore, was in the window with him, trying to help him in -- out.

Q. Did you go to help him?

A. Yes, I climbed up into the window and tried to assist Sergeant Moore, to the best I could. The gentleman, his shirt was tattered. He had several cuts and scrapes. He had a very dazed, foggy look on his expression. He was mumbling incoherently. You couldn't understand what he was trying to say, but he was grunting. And Sergeant Moore was leaning him forward to try to free the debris that was holding his legs.

Q. Let me interrupt you there. You say something was holding his legs. Could you describe the position he was in?

A. Sergeant Moore was standing on top of all the rubble at window level, so his legs were completely out of our sight, just compacted in a large amount of rubble and debris.

Q. He was trapped there?

A. Yes. He could not be lifted out.

Q. Did you and Sergeant Moore continue to try and free this man?

A. Yes. We leaned him forward to try to dig the rubble out from behind him to no avail; and when we leaned him forward, he

Eric Thompson - Direct

had a -- obtained a head wound at sometime, and the scalp of his head flapped forward as we leaned him forward. And we couldn't get him free from behind, so we leaned him back. And again, the -- the marble or rock was too heavy. We couldn't get him free. And he was bleeding a great amount. And Sergeant Moore kept telling him to hang on, that we were -- help was coming and we were going to get him out. We tried to -- for a few more minutes to free his legs that were pinned in the rubble.

Q. During the time -- I'm sorry.

A. Well, finally, after a few minutes of trying this, he -- he stopped grunting. He kind of sighed, and he stopped moving any at all. And Sergeant Moore took his pulse and found no pulse at that time.

Q. I'd like you to take a look on your screen, if you would, at Government Exhibit 1016. Does that picture depict the window where you were trying to help this man?

A. Yes.

MR. ORENSTEIN: Government offers Exhibit 1016, your Honor.

MR. TIGAR: We have an objection noted, your Honor.

THE COURT: Overruled. Proceed.

BY MR. ORENSTEIN:

Q. The jury can see that. What do you see in that photograph, Sergeant Thompson?

Eric Thompson - Direct

A. The ledge. The slanted ledge is where I climbed up to aid -- to assist them. The blanket, I suppose -- I'm not sure when this picture was taken -- is covering the body of the gentleman. And Sergeant Moore had been up standing behind him in the window, and I was there on the ledge trying to help.

Q. And you say the tarp is covering the body. Were you able --

A. I -- go ahead.

Q. Were you able to free the man?

A. No. We could not get his legs free from the amount of rubble.

Q. And he died there on that ledge?

A. Yes.

Q. Did you ever learn the name of the man who you were trying to help that day?

A. Yes, later on. It was Johnny Wade.

MR. ORENSTEIN: Thank you.

I have nothing further, your Honor.

THE COURT: Any questions?

MR. TIGAR: No questions, Officer. Thank you.

THE COURT: You may step down. You're excused.

THE WITNESS: Thank you.

THE COURT: Next, please.

MR. MACKEY: Greg Sohn.

THE COURTROOM DEPUTY: Would you raise your right hand, please.

(Greg Sohn affirmed.)

THE COURTROOM DEPUTY: Would you have a seat, please.

Would you state your full name for the record and spell your last name.

THE WITNESS: My name is Gregory Paul Sohn. Last name is spelled S-O-H-N.

THE COURTROOM DEPUTY: Thank you.

THE COURT: Proceed.

MR. GOELMAN: Thank you, your Honor.

DIRECT EXAMINATION

BY MR. GOELMAN:

Q. Good afternoon, Mr. Sohn.

A. Good afternoon, sir.

Q. You're here to tell us a little bit about your wife, Vicky, who died in the bombing?

A. Yes, sir.

Q. Where do you live?

A. I live currently in Seattle, sir.

Q. What do you do there?

A. I'm a recruiting first sergeant for the U.S. Army.

Q. How long have you been in the Army?

A. Been in the Army 17-1/2 years now, sir.

Q. And do you have a family?

A. Yes, sir, I do.

Greg Sohn - Direct

Q. How many kids do you have?

A. Five children.

Q. Are they all your biological children?

A. No, sir, they are not. They are -- three are my biological children and three were hers. I mean -- correction -- two were hers.

Q. I'm going to show you now Government Exhibit 1457.

MR. GOELMAN: Which I offer at this point, your Honor.

MR. TIGAR: No objection, your Honor.

THE COURT: Received. 1457 may be shown.

BY MR. GOELMAN:

Q. Can you identify the people depicted in this picture starting with the back row, please.

A. Yes, sir. Of course, there's Vicky standing to the left rear. Beside my right shoulder is Jessica. And right in front of Vicky to her right front is Gregory, Jr. To his left is Steven. To Steven's left is Vicky, and to Vicky's left is John Michael.

Q. And can you please tell us the ages of your children in this picture.

A. In the picture, John is 7, Vicky is 8 -- or Vicky is 7, and

Steven is 9, Greg is 12, and Jessica is 11.

Q. And are the three blonde children in that picture your biological children?

A. Yes, sir, they are.

Greg Sohn - Direct

Q. The other two were Vicky's?

A. Yes.

Q. Where was this picture taken?

A. This picture was taken on vacation in Orlando at Universal Studios.

Q. How long before Vicky's death?

A. This was the summer before.

Q. What did Vicky do at the time of the bombing?

A. Vicky was an operations sergeant for the Army Recruiting Battalion on the 4th floor.

Q. 4th floor of the Murrah Building?

A. Yes.

Q. I want to talk a little bit about April 19th. Did you and Vicky have plans for that day?

A. Yes, sir, we did.

Q. What were those plans?

A. The morning of April 19, 8:30, I last talked to her, and -- about 8:35. And we were discussing who was going to pick up the birthday cake. It was my son's birthday, also.

Q. How old was he?

A. He was going to be 12.

Q. Okay.

A. And she said she would pick up the cake, not to worry about it. She had already picked up the present. We got him a tackle box and fishing pole because he likes fishing. And

Greg Sohn - Direct

that -- the plan was to have a -- a family birthday party there.

Q. Was that the last time you talked to your wife?

A. That was the last time, yes, sir.

Q. And later on that day, after you realized that your wife was missing in the bombing, did you make plans to make sure that your son had as normal a birthday party as possible?

A. Yes, I did. I -- a friend of the family picked up the children from school and took them to their house, and I told them -- told her not to let them watch TV -- rumors were already flying around what was going on, and the kids were kind of curious anyway -- and for her to get another birthday cake and to make this the most normal day possible and not tell them anything about what's happening. And as far as I know, they didn't at that point know anything.

It was just -- I said, "Could you just tell them that we've got to work late or something like that."

And she said, "That's lying." And she's a woman of -

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that goes to church regularly, and she wasn't going to do that; but because of the situation, she says, "I just won't tell them everything." And she'll keep them away from the TV. And they went on to, my understanding, have a good birthday party.

Q. Did there come a time when you decided it was necessary to

Q. DID THERE COME A TIME WHEN YOU DECIDED IT WAS NECESSARY TO talk to your kids about what had happened?

A. Yes. The next day, I finally had to sit down and talk with

Greg Sohn - Direct

them. We sat down in the living room floor at my home and we joined hands, and the chaplain was there and another counselor and some more friends of the family. And -- and they knew something was going on, but I went ahead and broke it to them. I'm not a very tactful person, I guess, sometimes, and I was told I should have broke it to them a little bit smarter, but I told them that mom is missing and she may not be coming back. But if there's any person that's going to be back because of what's going on -- I told them about the bombing at that time -- it was going to be her. They are going to find her because she's going to be the one that's going to come through this thing if nobody else does. She's just that kind of person.

Q. What was it about Vicky that prompted you to say that to your kids?

A. She was -- she stood her ground. She was stubborn. She's persistent. She always had a kind word, but she'd always be stern if -- if you weren't straight as far as the children were. She tries -- or worked very hard at being a perfectionist, it seemed like. And she was just rough on one side and gentle on the other side.

Q. What was the reaction of the five kids when you told them that their mom might not be coming back?

A. Well, of course, it was just nothing but a -- we're all sitting there crying at that point, and everybody is trying to

Greg Sohn - Direct

comfort the children. I'm trying to comfort them. And "Why, why, why, why," is what I'm hearing. And "Are we going to be okay? Are they going to blow us up, too? And are they coming to the house?"

You know, they really didn't know what was going on at that time. They just knew that there had been a bombing and mom probably wasn't going to be coming home.

Q. And did you reassure your children about their own safety?

A. Yes, sir, I did.

Q. What did you tell them?

A. I told them that there was nothing that was going to get between me and them. And as long as they are with me, everything is going to be safe. I'm not going to let anything happen to them.

Q. I want to talk a little bit about April 25th, six days later. Do you remember that day?

A. Yes, sir, I do.

Q. Can you tell us about that, please.

A. April 25th is Steven's birthday, my other boy. And we had already had a birthday party there, most normal as possible considering the circumstances. The neighbor's kids over and

other friends of the family, and we ate cake and started opening presents, and Steven was having a problem. We got him some roller blades because he wanted some roller blades. Vicky and I had already talked about that anyway because he wore out

Greg Sohn - Direct

another set that was just plain roller skates and wanted to be like the other kids and have the new neat roller blades, but there's a hard plastic around the knee pads and the elbow pads on there and he couldn't get it open.

So I was on the hearth in the fireplace, helping him get that open, and that's when I noticed that the -- I looked out the front window. And the informing party, for better words -- it's my sergeant major, my colonel and the chaplain and so forth -- they are dressed up in their Class As with the good -- you know, the business-like look on their face that I know what they were coming there for. They are coming there to inform me, as they did, that they had found Vicky's body.

And before they came in the door, though, I told the children to get out of the house, go out and play, because I didn't want them hearing it the way I had to hear it just in case I -- I had assumed that probably this is what I was going to hear, but it didn't really hit me like that until it actually came into me.

Q. And did they, in fact, inform you that Vicky's body had been identified?

A. Yes. Yes, sir. They said they had identified her body by -- by records.

Q. You talked a little bit about the kind of person that Vicky was. What kind of mom was she to the -- your kids?

A. That's one thing I really -- I fell in love with her right

Greg Sohn - Direct

off the -- the bat was because of how she was. She's -- she's so loving. She at one minute had one child on one knee reading a book to them, the other one reading a book on the other knee, and helping somebody look up a word in the -- and she's doing so many different things with the children. She was a Brownie leader. She went to the -- to -- to PTA meetings. She went -- she made cupcakes and took them to the school for the children. And she participated in all kind of activities with the children. She just -- she was right there to turn them around whenever they were making a mistake, too. So it was what more could you want?

Q. What effect has her death had on the five children?

A. Well, the children -- well, they have nightmares. They have been receiving counseling. They -- one of them is still -- he's still peeing in his pants. He's afraid to get up sometimes at night. They have dreams. They still occasionally -- the younger ones come to my bed and sleep. And -- but as far as rebounding back from something like this, it's -- they're -- I can't think of the word, but they are



very -- they come together real good after this. I mean, they are really working together now to make things happen the best way they can despite the loss.

Q. Did you have a conversation with the children after Vicky's death about what lay before the six of you?

A. Yes. I talked to them about how it's very, very important

Greg Sohn - Direct

that we bond together, tighter than we ever had been, and it would be Vicky's wishes anyway. And I considered us pretty tight anyway, but now -- even more important now is kind of like me bonding my -- my little team together, I guess you could say, to make sure we're right there for each other. And we always had a shoulder.

And if -- I immediately went and got a cell phone because they couldn't contact me one day from school, once I eventually got them back into school. And because my girl was just throwing a fit at school because they couldn't get a hold of me. So that made communications better, also. Just little things like that, the insecurities where I always had to talk to them about I was going to be there. I had to keep reassuring them because I still don't know if they -- you know, if they believe it really deep in their heart. They still doubt things, you know.

Q. You and Vicky both had children from previous marriages?

A. That's right.

Q. What was it like to merge these two families together?

A. It was a -- I would call it a masterpiece of work.

She's -- she's very good when it came to -- she's talking to me about things, how difficult it was, and I would talk to her because the two children she had and the three that I had, put them together, they are all selfish in their own ways. And her having one boy and one girl, the girl didn't have to share girl

Greg Sohn - Direct

things and the boy didn't have to share boy things, so that was something to get over and get working together. And the biggest part of it was making the family feel like one family. And I would put my arms around her children, she'd put her arms around my children in the beginning; and before you know it, it was everybody was feeling like they were in the family. And one would stand up for the other. Nobody'd even question anything else.

Q. Did your children also bond together in the face of discrimination?

A. Yes. And that was one of the -- I guess one of the stronger things in the beginning when I lived in a town there in Oklahoma is they were called names because of their backgrounds. And I had gone to the school, and some people got suspended from the bus, for riding the school bus, and -- because my daughter Jessica didn't know whether to stand up or -- or -- or drop down a little bit or -- or stand up for

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brother and then the brother stand up because they weren't biologically together. But after discrimination and several things that were being said and -- and we started working together as a family, one stands up for the other regardless of what happens. It's just like brothers and sisters now. I mean, there's -- they are inseparable.

Q. Did you and Vicky have a plan as far as adopting each other's children?

Greg Sohn - Direct

A. Yes, sir, we did. Our plan, we started the adoption process before the bombing. In March, we started the adoption process. And 1 May, it was supposed to be finished.

Q. May 1, 1995?

A. Yes, sir. And -- and we didn't get to that. But I pursued on with it anyway. And that was her wish. It was my wish. We were a family. We were worried about legalities in case one of us would pass or -- or something, would the other spouse be able to keep the children, keep them as a family as we wanted it to be.

And then the bombing took place, and that put a stop into that. And then I was right in the court just a few days later, making sure that I still had those children, keeping them together as a family. So I was going for guardianship, and I -- I got that. And, oh, a year and a couple months later finally, I ended up finally going through a lot of -- in and out of court a lot and finally ended up adopting the children. Finally, we got what we wanted. And I even tried getting them to go ahead and let her adopt them even though she had already passed, but the court couldn't find any kind of basis for that -- because that was her wish, also. And it just really wasn't complete. But it's -- we're all together now, and that's what's important.

MR. GOELMAN: Thank you, Mr. Sohn. I don't have anything else.

MR. TIGAR: No questions, your Honor.

THE COURT: You may step down. You're excused.

Next, please.

MR. MACKEY: Next, we'll call Kay Ice Fulton.

THE COURT: Thank you.

THE COURTROOM DEPUTY: Raise your right hand, please.

(Kay Fulton affirmed.)

THE COURTROOM DEPUTY: Would you have a seat, please.

Would you state your full name for the record and spell your last name.

THE WITNESS: Kay Ice Fulton, F-U-L-T-O-N.

THE COURTROOM DEPUTY: Thank you.

DIRECT EXAMINATION

BY MR. MACKEY:

Q. Ms. Fulton, good afternoon.

A. Good afternoon, Mr. Mackey.

Q. Where do you reside?

A. I live in Beaumont, Texas.

Q. And how long have you been in Texas?

A. Two months.  
Q. Before that, did you spend a lot of your life in Oklahoma?  
A. Yes, I was born and raised there.  
Q. And were you a member of a family that included five children?  
A. Yes, sir.

Kay Fulton - Direct

Q. Where were you in the age range?  
A. I am the youngest.  
Q. And what was the makeup of the rest of your siblings?  
A. There were four girls and one boy in my family.  
Q. And what was that one boy's name?  
A. Paul Douglas Ice.  
Q. Ms. Fulton, I'm going to ask you some questions about your brother who we all understand that he died in the Oklahoma City bombing; correct?  
A. Correct.  
Q. Tell the members of the jury, please, a little bit about your shared youth, you and Paul, growing up in Oklahoma City.  
A. Paul, bless his heart, was sandwiched in between two girls on each side and he was the consummate big brother, looking over his little sisters and looking up to his older sisters. It was an ideal childhood for all of us, and we grew up so happy and such a -- a -- just a really nice family.  
Q. After he graduated from high school, Mrs. Fulton, did Paul go on to serve in his country's military?  
A. Yes. First, he served a short stint in the Army reserves directly out of high school. It was less than a year.  
Q. And how long -- excuse me -- after that, did he go into the Marine Corps?  
A. Correct. First, he went to Oklahoma City University where he got a bachelor's of science; and the day he graduated, he

Kay Fulton - Direct

was commissioned into the United States Marine Corps.  
Q. And how many years did he serve in the Marine Corps?  
A. Active duty, it was around five or six years. With reserve service, all together, it was about 20 years he served in the Marines.  
Q. When he retired from the Marines, was discharged, what was his rank?  
A. He achieved the rank of lieutenant colonel.  
Q. And during those 20 years, what sort of assignments did he carry out on behalf of the Marines?  
A. He was primarily an intelligence officer with the corps. He served in -- he -- he was first a pilot on a -- on the Intruder aircraft, and he eventually got into the intelligence section of the Marine Corps, serving a lot of his time in Seepac, which is in Hawaii, which is where he served the last several years of his reserve duty.  
Q. Was Paul married during his life?

A. Yes, he was.  
Q. And to whom?  
A. He was married to Faith Henson.  
Q. At the time of his death, was he divorced?  
A. Yes, he was.  
Q. And how long had he been divorced?  
A. It was several years.  
Q. Did he have any children by that marriage?

Kay Fulton - Direct

A. Yes, he had two daughters who are now about 18 and 21 years old.  
Q. And did they live in Oklahoma City during most of the time that he did?  
A. Yes. Yes.  
Q. When he left the Marine Corps, did your brother start a career in law enforcement?  
A. First, he worked at a bank for about a year or two. And -- but he really, really strived to get government service. He loved working for the government. And his first opportunity was with the IRS. He had a -- an accounting and business background. And he became a member of the Criminal Investigation Department of the IRS where he served for about four or five years.  
Q. And when he left the IRS and the Criminal Investigation Division of that agency, did he join service with the U.S. Customs?  
A. Correct.  
Q. How many years had he worked as a Customs special agent before he died?  
A. He started in May of '87. So he was with Customs for almost eight years.  
Q. And during the course of those eight years, did you see -- learn of ways that he contributed to communities as a result of his work as a Customs agent?

Kay Fulton - Direct

A. Oh, absolutely. He -- there were a broad -- there was a broad range of cases that he worked on, anything from -- from products coming into the country illegally or anything from drugs to -- oh, goodness. It was a -- a wide range of -- of products that he worked on.  
Q. Do you recall a particular case where he was responsible for seizing more than a million dollars in currency?  
A. Yes. There was a bust in El Reno, which is a town just on the west side of Oklahoma City that he was -- played a part in. And since there were federal agents and the local law enforcement involved in this, the town received about half of -- of what was seized in this raid. May I tell what they did with this?  
Q. Certainly.  
A. It was over 500,000 that the city -- \$500,000 that the City

of El Reno got out of this. And with that money, they built a firing range to train their police officers on because they didn't have one. And the -- when they opened the range, it was christened the Paul Ice Memorial Range because my brother was also the firearms and physical coordinator for the Oklahoma City U.S. Customs office.

Q. Ms. Fulton, you told the jury that Paul had a couple young daughters at the time of his death?

A. Yes.

Q. Were they important to him?

Kay Fulton - Direct

A. Oh, Paul's daughters were his world, as was all of his family. He -- he was the consummate family person. Son, brother, father, nephew, cousin. He loved his family.

Q. Ms. Fulton, I want to show you a photograph, Exhibit 1449.

MR. MACKEY: And I'd offer that into evidence, your Honor.

MR. TIGAR: No objection, your Honor.

THE COURT: Received. May be displayed.

BY MR. MACKEY:

Q. And is the man in that photograph your brother?

A. Yes, it is.

Q. Do you have an idea about when that photograph of Paul Ice was taken?

A. It -- it was during a Christmas in -- it was -- this was the Christmas of my parents' 40th wedding anniversary, which was 10 years ago. They just celebrated their 50th.

Q. And approximately how old is Paul in this photograph?

A. He would be in his mid 30's in this picture.

Q. And what does he have in his hands there?

A. Airplanes.

Q. And was that a love of Paul Ice's?

A. It was. After being a pilot in the Marine Corps, he had several planes through the course of the years. And he loved -- he loved to fly. He loved having his own plane. And just like everything else Paul did perfectly, he was an

Kay Fulton - Direct

excellent pilot and he -- he just loved to fly. He loved being up in the air by -- by himself or with friends -- friends or family.

Q. Ms. Fulton, was your brother a supporter of the Special Olympics?

A. Yes, he was. In fact, on April 18th, there was a basketball game in Oklahoma City for Special Olympics that he attended. In fact, that's the last photograph we have of him, was taken at that game; and he had a lot of friends who were very active in it, and he always supported them and went to any function he could for them.

Q. And did you see your brother, Paul Ice, on that day, April 18th?

A. Yes. I did. I saw him just a few hours before the picture

A. Yes, I did. I saw him just a few hours before the picture was taken.

Q. And was that the last time you saw him?

A. Yes, it was.

Q. How did you learn of the news of the bombing in Oklahoma City?

A. I worked downtown, and I was standing at the window. I worked three blocks south of the Murrah Building. And when the blast happened, it was so powerful that I fell to my knees, but I got up. We didn't know how bad it was because we were on the south side of the building and we didn't see the devastation. But I knew it was the federal building, and we were the leasing

Kay Fulton - Direct

office of the building I was in. And as soon as I could get away from my tenants, I started calling my parents to say, "Have you -- have you talked to Paul? Have you heard from him?" And so it was several hours before I could get to them and before we could even talk to anyone with Customs and before we even knew that he was at work that day.

Q. How many total days did you and your mother and father and other family members wait to learn of Paul's fate?

A. It was eight days before they found his body.

Q. Ms. Fulton, I -- we've gotten something of the flavor of Paul Ice, but I'd like to ask you, if you wouldn't mind, to describe in your own words who he was and what this community lost as a result of his death.

A. Oh. Paul excelled at everything he did. And he was the best. He was the best brother and son and father and Marine and federal agent and man. He was deeply spiritual. He loved this country. My brother loved this country. And he protected it as a Marine and as an agent; and he was so, so proud to be able to take care of everyone in this room and everyone in this country.

MR. MACKEY: Thank you, Mrs. Fulton.

THE COURT: Any questions?

MR. TIGAR: No, I have no questions. Thank you.

THE COURT: You may step down. You're excused.

Next, please.

Kay Fulton - Direct

MR. MACKEY: We'll call Carl Chipman.

THE COURTROOM DEPUTY: Would you raise your right hand, please.

(Carl Chipman affirmed.)

THE COURTROOM DEPUTY: Would you have a seat, please.

Would you state your full name for the record and spell your last name.

THE WITNESS: Carl Chipman, C-H-I-P-M-A-N.

THE COURT: Proceed.

MR. SENDEL: Thank you, your Honor.

DIRECT EXAMINATION

BY MR. SENDEL:

Q. Would you tell us where you live, please, Mr. Chipman.  
A. I currently live in Stillwater, Oklahoma.  
Q. And where is Stillwater in relation to Oklahoma City?  
A. It's about north by northeast, about an hour away.  
Q. How long have you lived in Stillwater?  
A. I guess now five-and-a-half years. Since '92.  
Q. You work there in Stillwater?  
A. Yes. I graduated from OSU in '96 and took a job in an engineering firm in Stillwater.  
Q. You mentioned OSU. What is the full name of the university?  
A. Oklahoma State University.  
Q. And did you lose a family member in the bombing at the

Carl Chipman - Direct

Alfred P. Murrah Building?

A. Yes, sir, I did.  
Q. Who was that?  
A. My father, Robert Neal Chipman.  
Q. At the time of the bombing, how old were you?  
A. I was 2 -- I just -- no. I was 20. I turned 21 about two months later. 20.  
Q. And at that time, in April of 1995, were you still a student in college at Oklahoma State University?  
A. Yes. I was a junior.  
Q. Where did your father live in April of 1995?  
A. He lived in Edmond, Oklahoma, about 20 minutes north of Oklahoma City.  
Q. Who did he live there with?  
A. My mother, Gloria.  
Q. Were there other members of your family besides your father and mother and yourself?  
A. Yes. I have an older sister named Kathy who was living in Tokyo at the time with the U.S. Air Force and a stepsister, my sister who is the same age as I am who was living in Norman, Oklahoma, going to school at the University of Oklahoma.  
Q. In April of 1995, how long had your father and mother lived in the Oklahoma City area?  
A. Seven years. Since 1988.  
Q. Prior to moving to Oklahoma City, what did your father do?

Carl Chipman - Direct

A. My father was a -- we moved there -- captain in the U.S. Air Force, and he did mostly air traffic control. We moved around a lot.  
Q. Did your father retire from the military there?  
A. Yes, he did. Actually, he retired in '92, or right when my sister and I started college. And actually, he and my mom also started going back to college at that time, too, so there was actually four of us in college at that time. It was pretty funny.  
Q. At the time of the bombing in April of 1995, where was your

father working?

A. He was working at the Water Resources Board. Just -- he had just started there about three months earlier. He had just started there in January of '95 and had been working there for a little while, and it was across the street just south of the Murrah Building, I believe.

Q. And what was your father doing for the Water Resources Board?

A. I'm not quite certain. It -- he tried to explain it to me once, but I'm an engineer and he was more of a business-type person; and so he explained it to me a couple times, but I didn't quite understand.

Q. Were you in Stillwater, Oklahoma, on April 19, 1995?

A. Yes, I was, actually. I -- I had a test that day, actually, and as I was walking out the door to take the test, I

Carl Chipman - Direct

happened to see something on the news, and I didn't even have time to see what it was. And then when I got to the test, the professor actually told me what happened.

Q. And told you there had been a bombing in Oklahoma City?

A. Yeah. He told the whole class, actually. The test scores weren't very well on that test. I think everyone was very concerned. He told everyone about it. My test was at 9:30, and I was running late.

Q. Later that day, did you get in contact with your family?

A. Yeah. When I got back from my classes that day, I got a -- a really frantic call from my sister saying, you know, "This is Julie. We can't get a hold of dad. We need you to get down here." And I grabbed some stuff real quick and had my friend drive me down.

Q. And did he drive you down to Oklahoma City?

A. Yeah, he did.

Q. What did you do when you got to Oklahoma City?

A. En route, I think I had a -- we stopped and called -- or I can't remember if I had a cellular phone. But en route, I found out that they had found my father and that he was in the hospital. I think it was Presbyterian in the Health Science Center. And so we changed course and we met my family there.

Q. I'm going to show you a photograph we've marked as Exhibit 1386. Is this your father?

A. Yes, sir, it is.

Carl Chipman - Direct

MR. SENDEL: Your Honor, we're going to offer 1386.

MR. TIGAR: No objection, your Honor.

THE COURT: Received. May be shown.

BY MR. SENDEL:

Q. When you got to the hospital, who was there?

A. My sister Julie was there. My mother was there. Her boyfriend -- I'm sorry. Julie's boyfriend, Jay, was there. And then I was.

Q. Were you able to see your father?



Q. were you able to see your father:

A. Yeah.

Q. Did you have -- could he talk to you? Were you able to speak with him?

A. We never talked to my father until the time he died. We -- he never woke up.

Q. How long was he in the hospital before he died?

A. A little under two days. He came in, you know, that -- that day, you know, from -- they brought him there and they actually said when they brought him in on the stretcher, he had put his thumb up, you know, okay. After he went into surgery, he never regained consciousness.

Q. If you would, please, tell us what impact it's had on you to lose your father.

A. That's a real tough one. My father and I were just getting to the point in time where I was at the age where he could talk

to me as -- as a man. I was no longer just his son. I was no

Carl Chipman - Direct

longer the son he was responsible for raising and stuff. My father and I were just beginning to get to the point where we could communicate as adults to each other, and it was really great. You know, it's real hard, you know.

My father was a very strong person. And as always, we

had clashes, also, but at this point in time, he was really beginning to respect me and we were beginning to really talk about things and share and help each other out.

I was, you know, learning a little about his worries and fears, and he was doing likewise. And, you know, the chance that I was going to have was to have a real good friend in my father, you know. Not just my father, but also one of my good friends. And now that, I don't have.

Q. What effect has it had on your mother and your sisters?

A. My sister, Kathy, had had a very -- her and my father had a fallout; and at the point in time, they were reconciling and they were trying to work together and rediscovering their affection and love for each other. And she, you know, obviously didn't get to finish that reconciliation. And it's -- still to this day, you know, the bitterness and anger she has over it is just palpable.

My mother lost the hugest foundation in her life.

You

know, she was a lot of things, but the one big thing she was was my father's wife, and that whole identity of who she was is now gone and she's having to fill it up. I mean, for 15 years,

Carl Chipman - Direct

she was my father's wife and our mother. And she still has the "our mother" part, but she's no longer my father's wife. And she now has to make a new identity for herself, just out of the blue with no one to help her, no support. You know, the one

she loves the most is gone.

And my sister -- my other sister, Julie, she's been very strong about it. But my father, although he was her stepfather, was her daddy. And no girl likes to lose her daddy.

MR. SENDEL: Thank you, Mr. Chipman.

I have no further questions.

MR. TIGAR: No questions. Thank you.

THE COURT: You may step down. You're excused.

Next, please.

MR. MACKEY: Alan Prokop.

THE COURT: Thank you.

THE COURTROOM DEPUTY: Raise your right hand, please.

(Alan Prokop affirmed.)

THE COURTROOM DEPUTY: Would you have a seat, please.

Would you state your full name for the record and spell your last name.

THE WITNESS: Sergeant Alan A. Prokop, P-R-O-K-O-P.

THE COURTROOM DEPUTY: Thank you.

THE COURT: Mr. Ryan.

MR. RYAN: Thank you, your Honor.

Alan Prokop - Direct  
DIRECT EXAMINATION

BY MR. RYAN:

Q. Officer Prokop, where do you live?

A. Oklahoma City.

Q. What do you do there?

A. I am the police liaison officer for the municipal court for the Oklahoma City Police Department.

Q. How long have you been with the Oklahoma City Police Department?

A. 28 years, sir.

Q. Let's turn our attention to April 19. Where were you at 9:00?

A. I was in my office located in the basement of the municipal court building, which is the building directly north of the police department.

Q. Tell us what happened.

A. Officer Ron Bell was in the office with me. He had just finished 8:00 court and had come in to complete his paperwork before he went home to sleep. He had worked all night. Right after 9:00, we heard the explosion. The building shook. My office is located in the basement. We ran upstairs to check the building and the people upstairs.

Q. What did you see?

A. The people were leaving the building, not in a panic but evacuating. We went to the north side of the building. There

Alan Prokop - Direct  
were large picture glass windows there, and we could see the smoke and fire coming from the vicinity of the federal

building.

Q. And about what time of the morning was this?

A. Approximately 9, 9:00, 9:02 or 3.

Q. What did you do?

A. The doors were clogged up with people leaving the building, so Officer Bell and I ran to an auxiliary exit located at the far east side, north corner of the municipal court building, and exited the building.

Q. About how far was your office from the Murrah Building?

A. Approximately six to seven blocks.

Q. And as you got outside of the building you were in, what was in the air?

A. The sky was black and gray. We had debris falling in the street around us, large chunks of rock, dirt. It was smoky. We could still see pages of papers. I looked down and saw one page that had the letterhead from the Social Security Administration on it. And Officer Bell remarked to me that it had to be the federal building.

Q. What did you do?

A. My personal vehicle was parked in the parking lot directly north of us. Officer Bell's police car was about three blocks away, so we jumped into my personal vehicle, drove directly to the federal building. We parked the car at 4th and Harvey,

Alan Prokop - Direct

which would be the southwest corner of the Murrah Building.

Q. Tell us what you did. Take us through your efforts to help the people that morning.

A. As we stopped and got out of the car, people were running from the building. Bloody. Many people carrying other people. We checked equipment. Officer Bell had a hand radio. I had a small flashlight, I believe. He had a larger flashlight. At this time, Officer Washington, a new officer, approached us. He had been in district court. He ran up. The three of us approached the south side of the building. I had one pair of gloves, and I asked Officer Bell if he was right-handed or left; and I split my gloves up, one glove each.

Q. What did you do next?

A. We approached the south portion of the Murrah Building, observed all the glass to be out of the building, people to be standing in the windows all the way to the 6th or 7th floor, screaming and crying for help. We could observe smoke coming through the building. There were people staggering and falling out of the building, walking injured. There were civilians helping other people out.

We approached the very south corner of the building and looked in. The entire 2d floor was devastated. There were rubbles of concrete. There was a thick smoke, a layer of real thick dust. There were sparks sparking from inside the building where the electric wires were still on. I could smell

Alan Prokop - Direct

gas and a real strange chemical smell, sir.

Q. Did you do anything about the utilities?

A. Yes, sir. I asked Sergeant Bell to contact dispatch and tell them we needed all the utilities turned off to the building as soon as possible. Requested all heavy equipment, all ambulance units and all rescue workers that the police department could send and advised them that we were in the building.

Q. How did you enter the building?

A. It was a kind -- about a 4-foot drop through a window into rubble and concrete debris, office materials. And it was still real thick, heavy dust with the electrical wires sparking when we dropped down in the building.

Q. Let me show you what has already been received into evidence as Exhibit 1012. Can you see that photograph on your screen?

A. Yes, sir.

Q. Will you take the pen that's on the top of your desk there. Put it under your desk and show us, if you would, the location where you were able to enter the building that morning.

A. It was this area here. And here, sir.

Q. Thank you. Now, let me also show you what's been marked for identification but not received into evidence as Exhibit 1500.

A. Yes, sir.

Alan Prokop - Direct

Q. Can you identify that photograph.

A. Yes, sir. This is the -- one of the windows where we entered. It shows what the debris looked like and the inside of the building.

MR. RYAN: Government would offer Exhibit 1500.

MR. TIGAR: No objection, your Honor.

THE COURT: Received. May be displayed.

BY MR. RYAN:

Q. Tell the jury what they are seeing in this photograph.

A. This was a window prior to the explosion. Of course, the glass is gone. You can look inside the building and see what the inside of the building looked like as we approached the -- the Murrah Building itself. It was necessary to climb up on this ledge and then drop down. Inside the building, there was piles of rubble, insulation, ceiling tiles, an occasional desk or chair, and numerous body parts, sir.

Q. All right. Now, tell us about the first encounter you made with someone who was injured once you were inside the building.

A. We could hear screams and moans from inside the building as we climbed into the building. Officer Washington shouted to Officer Bell and I as we looked around that he had found a victim. We followed him towards the pit area, they called it later. And he had located a piece of concrete setting up on its edge. It would have been one of the upper floors that had fallen into this area. Next to the ledge and down about 10

Alan Prokop - Direct

feet was a female. She had been crying for help. Officer Washington climbed down into the crevice. I leaned up against the piece of concrete, and Officer Bell went halfway down. Officer Washington was able to free her from the rebar and the debris, lift her up and hand her to Officer Bell. He then handed her to me, and I exited the building with her.

Q. What did you do with this lady once you got her outside the building?

A. There was people still running in and out, but there was not any medical personnel right up to the building at this point. So I carried her down the plaza to the street, 4th and Harvey. And on the street corner there, the ambulances were starting to pull up and other officers were arriving. I laid her down on the ground, asked her if she was okay. She said she was dazed. I couldn't see any blood. She -- I asked her her name. She told me her name was Teresa, and then she began to cry. I told her that I needed to leave her there and that I had to get back in the building, and she grabbed my shirt and asked me not to leave.

And I said, "You'll be okay here."

And she said, "Yeah, but you won't."

And she was worried about me going back in the building. I finally convinced her that I had to leave, and a medical worker took care of her and I left and went back into the building.

Alan Prokop - Direct

Q. What did you do once you reentered the building?

A. As I entered the building a second time, there had already been some more rescue workers and a lot more civilians showing up. As I entered the building a little bit west of where I had come out with her, another rescue worker came up and handed me the body of a man. His body was ashen. His head was back. His eyes were open. He was covered with a layer of dust. There was blood running out of his mouth caked up. There was no breath, and I could find no pulse, sir.

Q. What did you do?

A. I carried him back from the building to the plaza area. And there were medical people there showing up, and I handed him off to another person who carried him to the street.

Q. What did you do after that?

A. I reentered the building nearer what I understood was an elevator-type shaft. There was a large pile of gravel, rubble, and concrete there. As I approached that rubble, I could hear moaning and groaning. And I observed an arm and hand to be protruding from the gravel and waving back and forth.

Q. What did you do?

A. I took the hand and squeezed it. It squeezed back. It appeared to be a female's hand. I traced the arm back into the concrete, and I could observe that there was a large portion of flooring, concrete, probably 25 feet long, 12 feet tall, probably 16 inches thick to be laying on top of this lady.

Alan Prokop - Direct

There was another piece of concrete behind it. There was a rescue worker behind the concrete working towards me. As I tried to speak to her, I could hear gurgling sounds and what I conceived to be water running, sir.

Q. Was it water running?

A. No, sir. I became upset and shouted, "Somebody turn the water off. This lady is going to drown."

The rescue worker behind the concrete held his hand up and said, "Alan, it's not water. It's blood," and held his hand up for me to see.

Q. What did you do with respect to this lady that you were holding her hand?

A. I held her hand for about another three or four minutes and tried to talk to her. I prayed a little. Her hand got cold and stiff, and she quit moving.

Q. Did you check her pulse?

A. Yes, sir. I checked pulse in her wrist and up into her elbow. Her hand continued to get cold, and I could find no pulse.

Q. What did you do after this lady's pulse stopped beating?

A. I wasn't doing real well, and I had to leave that area. So I told the other rescue workers that they needed to come over here; that there was a lady here. And I stood up and left as two other workers came over and started working in that area, and I moved in towards the interior of the building.

Alan Prokop - Direct

Q. Are you still on this plaza level?

A. Yes, sir.

Q. Where did you move to?

A. As I moved into the building, there had been a lady approach me and tell me that there was a day-care area in the building. I had not known that prior to this time. I asked her how many children were in the day care. She said 40 to 50, and she pointed toward the west side of the building. As I moved into that building, a rescue worker came up and handed me a child and I exited the building. Because of the interior damage, it was not like anything you could imagine inside the building as that picture shows. The inside, there would be mounds of brick and rock and debris 3 or 4 feet tall, and you would crawl up over those to move over in ledges and areas where you had to walk. So we were trying to pass victims out to each other for their safety and so that more rescue workers could get through there.

Q. Was the baby that you were handed alive or dead?

A. It was not moving, and it appeared to be dead. It had an extreme wound across its forehead. It was covered with a heavy black dust. It did not cry or move.

Q. What did you do with this baby?

A. I exited the building. It was probably only 12 feet, 15 feet, and another rescue worker ran up to me and I handed

the baby off to him.

Alan Prokop - Direct

Q. What did you do next?

A. I reentered the building and got a little bit further into the interior when I was handed another baby. This child was alive, was crying and coughing. And I turned and headed out of the building with it. The child was bleeding about the nose and mouth and out of the ears, and I exited the building with that child.

Q. Do you know the name of that child?

A. No, sir.

Q. What did you do following that?

A. As I was exiting the building with this child, I heard Firemen Atchley who was the photographer, I believe, for the fire department. He had been working a little bit further west and a little bit deeper in the interior than I had been when I was handed the child. He said, "Alan, I have two more."

And I said, "I'll be right back."

I ran out of the building with this child, through the plaza area and down towards the steps when an AmCare worker, a female, ran up to me and I handed the child off to her and ran back into the building.

Q. Did you go back in alone?

A. No, sir. As I was running back towards the building, Sergeant -- Detective Sergeant Don Hall ran up to me and asked me if I had the children. He was upset. He had just gotten there and didn't know how to get into the building. And I told

Alan Prokop - Direct

him there were two more in there, to follow me in, and he followed me back into the building, sir.

Q. And what happened once you and Detective Hall reentered the building?

A. He followed me back in through the area to where Fireman Atchley was kneeling down. He had uncovered these two children. They were laying real close to each other. He was cleaning their face and the dust off of them. As I approached him, he reached down and -- and picked the first child up and handed it to me. That child was later identified as Jill Webber.

Q. What did you do with this child?

A. I handed it to Don Hall who was standing behind me. I saw him cradle the baby in his arms. It had a severe arm injury as well, and he headed out of the building.

Q. What happened next?

A. I turned back around to Atchley, and he handed me the second child they later identified as Brandon Denney.

Q. What did you do with Brandon Denney?

A. He said, "Look at his injuries."

And I looked down, and Brandon had a brick sticking out of his forehead, sir, the left side. It was protruding

out of his forehead, sir, the left side. It was protruding out, and I could see blood oozing around it. He was bleeding out of his mouth. His eyes were partially opened and appeared to be looking different directions and told me he had a brain

Alan Prokop - Direct

damage. I stabilized the brick with my hand, cradled him in my arms, and exited the building.

Q. What did you do after he exited the building?

A. He was whimpering, and so I ran as hard and as fast as I could directly to the -- where the ambulances had been picking up the children and the other victims at the -- the southwest corner of the building there at 4th and Harvey.

Q. Did you give Brandon Denney to one of the workers?

A. No, sir. There was an ambulance pulling out as I approached that area, and I ran up and kicked the ambulance, the side of the ambulance, and it stopped. And when it stopped, the back doors opened up. I climbed in the back of the ambulance, and there was a man laying on a gurney, strapped to a gurney. He had his arms across his chest. And as I climbed in the back of the ambulance, he opened his eyes. And he and I made eye contact, and he saw Brandon and smiled at me and he opened his arms, and I laid Brandon Denney on his chest. He laid his arms back around him and nodded to me, and I stepped back out of the ambulance and closed the door and watched it drive away.

Q. At some point that morning, were you ordered out of the building?

A. Yes, sir. I reapproached the building once or twice after that and helped with a few of the other bodies, and then we were ordered to leave.

Alan Prokop - Direct

Q. Were you, yourself, injured in connection with the things that you've told us about that you did that morning?

A. Yes, sir.

Q. Were you taken to a hospital?

A. The next day, I was treated at the hospital, yes, sir.

Q. What was -- how were you treated?

A. They tried doing some respiratory therapy to us for the inhalation of the concrete dust and told us we'd just kind of have to wait and see. And I had fallen several times. They did some therapy to my knees.

Q. Have you had nightmares since April 19th, 1995?

A. Yes, sir.

Q. What is your nightmare about?

A. It's the -- the fact, sir, that the people in the building -- as you entered that building, you would see dust move and bodies would come out of the dust, sir. They approach us every night. I see them every night. We -- there weren't enough of us. We couldn't help. And I'm sure they died waiting for us, sir.

MR. RYAN: That's all I have, your Honor.



MR. TIGAR: No questions, your Honor.

THE COURT: All right. You may step down. You're excused.

THE WITNESS: Thank you.

MR. RYAN: Your Honor, at this time, we'd play the video involving Brandon Denney. Exhibit 1427.

THE COURT: All right. You may do so. You said this is Brandon Denney?

MR. RYAN: Yes, your Honor.

(Exhibit 1427 played.)

MR. MACKEY: Judge, we'll call Sharon Coyne at this time.

THE COURT: All right. Thank you.

THE COURTROOM DEPUTY: Would you raise your right hand, please.

(Sharon Coyne affirmed.)

THE COURTROOM DEPUTY: Would you have a seat, please.

Would you state your full name for the record and spell your last name.

THE WITNESS: Sharon Rose Coyne, C-O-Y-N-E.

THE COURTROOM DEPUTY: Thank you.

MS. WILKINSON: Thank you, your Honor.

DIRECT EXAMINATION

BY MS. WILKINSON:

Q. Good afternoon, Mrs. Coyne.

A. Good afternoon.

Q. Could you tell the jury where you live.

A. I live in Moore, Oklahoma.

Q. How old are you?

A. 27.

Sharon Coyne - Direct

Q. Are you married?

A. I am, to Scott William Coyne.

Q. How long have you been married to Scott?

A. Six years.

Q. Back in April of 1995, where were you working, Mrs. Coyne?

A. I worked for the Federal Court Clerk's Office, downtown Oklahoma City, for the Western District the Oklahoma.

Q. And how far is the federal courthouse in Oklahoma City from the Alfred P. Murrah Building?

A. It's directly south. It's right across the street.

Q. Before you started working in the Federal Court building, did you ever have any military service?

A. I did. I joined the Army in '89, and was discharged in '93.

Q. What did you do for the United States Army?

A. I was a Russian linguist.

Q. And when you and your husband moved to Oklahoma, did you talk about having a family?

A. We did. We had talked a little bit while we were married, but we were going to wait until we were out of school and making six digits and -- but when I got out of the military, I found out that I was pregnant. I didn't realize before I got

out, so I was about three months pregnant when I got out.  
Q. And before your baby was born, did you express to your husband whether you wanted a boy or a girl?

Sharon Coyne - Direct

A. No. I -- not to him. You know, everybody wants a healthy baby; and secretly, I think most men want little boys and most women want little girls. So I did the right thing and I told everybody I wanted a healthy baby. And he had decided that we wouldn't find out the sex of the child at the ultrasound. And I wanted a girl so badly that I decided it would be a boy, so that I could get ready and I would be, you know, excited about a little boy. So I convinced myself, my husband, his family, my family, that it would be a boy. And we purchased boy things and --

Q. And did you have a baby on February 9, 1994?

A. I did.

Q. And what kind of baby did you have?

A. I had -- well, I have to tell you first that it was not just go in and have this child. I mean, I had a perfectly healthy pregnancy and got in there that day, and there were some complications. And they had to do an emergency cesarean section. But when I got in there that morning, the woman -- the nurse who had hooked me up to, you know, the heart monitors and the fetal heart monitor had said, "It looks like it's going to be a little Valentino. Really wanted a girl. Hadn't had a girl yet this morning, but we can do all boys today." So it just kind of confirmed that I was -- what I already had convinced myself of, and that's that it would be a little boy. And --

Sharon Coyne - Direct

Q. What happened after the cesarean?

A. The anesthesiologist told my husband -- he said, "Well you need to tell your wife --"

THE COURT: I don't understand the relevancy of this part of it.

MS. WILKINSON: It gets to some of the impacts, your Honor.

THE COURT: Move ahead.

MS. WILKINSON: Yes.

BY MS. WILKINSON:

Q. Mrs. Coyne, did you have a little girl --

A. I had a little girl.

Q. -- on February 9? What was her name?

A. Her name is Jaci Rae, Jaci Rae Coyne.

Q. And when you worked at the federal courthouse, where was Jaci Rae during the day?

A. She was in the day-care across the street. She had been over there for about three weeks.

Q. That's the day-care center in the Alfred P. Murrah?

A. Alfred P. Murrah.

Q. And was she killed on April 19, 1995?

Q. And was she killed on April 19, 1995?

A. Yes, she was.

Q. How old was she when she died?

A. She was 14 months, 10 days.

Q. Could she talk at the time?

Sharon Coyne - Direct

A. A little bit. She said "Mama" and "Dada."

Q. What kind of little girl was she?

A. Physically, she was about 20 to 25 pounds. She had big blue eyes. She looked just like her daddy except for without the beard. Very little hair. Jaci was kind of a ham. She liked to be in front of the camera. She liked to be held by a lot of people. It didn't matter who. Anybody. She was a very friendly little girl. She was never shy, not a day in her life.

Q. Let me have you look at Government's Exhibit 1534, which we will introduce into evidence.

MS. WILKINSON: We move 1534, your Honor.

THE COURT: Have any objection?

MR. TIGAR: No objection, your Honor.

THE COURT: All right. Received. May be shown.

BY MS. WILKINSON:

Q. Is this Jaci?

A. Jaci in her raspberry picture.

Q. And how old was she when this picture was taken?

A. It was shortly before the bombing. She was about a year old.

Q. On the morning of April 19, 1995, were you in your office in the federal courthouse?

A. I was. I was a file clerk.

Q. Did you feel the explosion?

Sharon Coyne - Direct

A. I did. I heard it. I felt it. Didn't know what it was. Knew there was, to my knowledge, not ever an earthquake in Oklahoma, so I was very confused about what had happened.

Q. Did you attempt to find Jaci?

A. I did. My co-workers and I were all led out of the building and looked across the street. You could see the south side of the building, which has the plaza, right there in front of us. And then on either side of the plaza are the stair -- steps that go all the way up to the top of the plaza, which was the second floor, which is where Jaci was.

And we walked out and had gone on the west side and up, and I didn't think there was anything wrong. I mean, I had heard this explosion. I saw all the black smoke. But when I got up to the plaza, I just saw people walking outside who were injured, but they were walking on their own. They were coherent. I -- and I just didn't think there was anything wrong.

Q. Did you have any idea about the damage to the front of the Murrah Building?

-----  
A. No. Not till way later that night.  
Q. You didn't find Jaci that day, did you?  
A. No.  
Q. And did you -- did your husband eventually convince you to go home that evening?  
A. He did. We had gone to the First Christian Church and

Sharon Coyne - Direct

waited and filled out paperwork for the ME's office. And it was there that I had seen on the television the north side of the building, and it was there that I had decided that there was a remote possibility that Jaci could still be in the building; that they just hadn't been able to find her yet.  
Q. And that evening when you went home, what was your concern about Jaci?  
A. The First Christian Church was on the north side, and we lived on the south side; and so we were in my mom's van, and we were driving. And the way the highway sits in correlation with the Murrah Building, you could kind of see down there. And we were driving on the highway, and it was all lit up. And I thought that Jaci was still in the building. And because it had happened at 9:00 and it was almost 9 when we were going home that night, I knew that she was in a dirty diaper and it had begun to rain. And they had kept saying on the news that maybe there was a little pocket or something. And I thought that maybe she was exposed to the rain and that she was hungry and that she wanted me. She had mommy-itis really bad, and she really wanted to be around me all the time. And I was just afraid they wouldn't get her out that night.  
Q. Mrs. Coyne, how long did you have to wait to hear about your daughter?  
A. Seven days.  
Q. Now, if we could, could you tell the jury a little bit

Sharon Coyne - Direct

about how you've been impacted by losing your daughter and if you could start about -- with telling them about the memories that you have of your daughter today.  
A. I have -- I have lots of good memories of Jaci. They have sustained me since I've had to accept that she's not going to be back. And I had hoped all of the good memories would get me through.  
I have one memory of Jaci with my husband and I. We live in a very tiny house; and we were in the kitchen and we were making dinner one night, and we had blocked off the kitchen area for Jaci to not be able to get in there because it was a ceramic floor and we didn't want her to fall and hit her head. Anyway, it was kind of warm in the house; and she had taken -- we had taken off her shirt and her pants so she was basically roaming around with just her diaper on, you know. And my husband and I were in the kitchen making dinner, and she

started giggling. And so Scott went out there, and he said -- he said, "Sharon, you have to come here and see this." And she's still giggling; and so I poked my head around the corner, and there she stands. She has figured out how to get her diaper off, and she's walking around totally naked with the diaper sticky stuck to her hand. And she's just as happy as she can be.

So memories like that really have been able to help me quite a bit, except for that the end of memories always end

Sharon Coyne - Direct

with a vision that I can't seem to get out of my head.

Q. Mrs. Coyne, is that a vision that you had as soon as you realized that Jaci was stuck in the building?

A. It was about a week after -- yeah. It was about a week after the bombing, and it was out of nowhere. And it was -- it's not prompted by anything, except for maybe that I'm just a sick person. My memories all start good, and then they end with me -- and it happens very quickly -- hearing the explosion. And then my mind imagines the building falling, and then I see Jaci and her hair is kind of stuck to her head from the blood. Her eyes are open. And she's naked. And she's got on just her diaper, and it's -- it's totally filled with blood, and there's shards of glass all over her skin. And she's looking at me. And it won't go away.

Q. Mrs. Coyne, is that a picture that you've tried to get out of your mind?

A. Yeah.

Q. Were you allowed to see your daughter, or did you see your daughter before you buried her?

A. No. But I was -- no. I was very lucky. I got to hold Jaci before -- Jaci was wrapped up, and I got to feel of her and she was all there. And even though she was in a body bag and she was totally wrapped, I still got to hold her three times before.

Q. You don't know if this vision that you have is how she

Sharon Coyne - Direct

actually was?

A. No.

Q. Now, have you and your husband talked about having other children?

A. We have. It's taken until this year for us to decide that we were ready to move on to something like that. But you know, I had wanted a girl so badly. I wanted --

MR. TIGAR: Objection to this, your Honor.

THE COURT: Overruled. You may continue.

THE WITNESS: I had wanted the relationship with my daughter to be the same relationship that I have with my mom. And I wanted for there to be this mom-daughter friendship that develops. And even though my husband didn't agree with me, I had decided that she would be all I had. I didn't want any

more kids after her. She made my entire life complete, and she filled any hole I had left. And now it's just gone.

BY MS. WILKINSON:

Q. By losing her, do you have any fear about how you would feel about having another child?

A. I'm afraid that -- initially, I was afraid that any child I had, I would compare to Jaci. And I was always afraid that I wouldn't love that child as much or that I would resent that child for having a life when the one that I loved first didn't. And now I'm afraid if I have a little boy, because I wanted a girl so badly, that I wouldn't love it. And I know that's not

Sharon Coyne - Direct

rational. If you lose your child, it consumes your life. And I want it to go away, and it won't.

MS. WILKINSON: Thank you very much, Mrs. Coyne.

THE COURT: Do you have any questions?

MR. TIGAR: No questions. Thank you.

THE COURT: You may step down. You're excused.

Members of the jury, we'll take our afternoon recess at this time. And again, of course, during the time of the recess, please continue as you have at all recesses, avoiding discussion about the matters that you're hearing; and keep open minds. Remember that, as I said before, you're hearing one aspect of the matter, one of the factors that you may consider. There's more to be heard before you even in your own minds begin to make a judgment. So please do not discuss anything in connection with this matter, and avoid anything outside of the evidence. You're excused.

20 minutes.

(Jury out at 3:04 p.m.)

MR. TIGAR: May I approach, your Honor?

THE COURT: Yes.

(At the bench:)

(Bench Conference 147B2 is not herein transcribed by court order. It is transcribed as a separate sealed transcript.)

(In open court:)

THE COURT: We'll be in recess. 20 minutes.

(Recess at 3:08 p.m.)

(Reconvened at 3:28 p.m.)

THE COURT: Be seated, please.

(Jury in at 3:29 p.m.)

THE COURT: Next, please.

MR. MACKEY: Your Honor, we'll call Mr. William Titsworth.

THE COURT: All right.

THE COURTROOM DEPUTY: Raise your right hand, please.

(William Titsworth affirmed.)

THE COURTROOM DEPUTY: Would you have a seat, please.

Would you state your full name for the record and spell your last name.

THE WITNESS: William Edward Titsworth,

T-T-T-S-W-O-R-T-H

THE COURTROOM DEPUTY: Thank you.

DIRECT EXAMINATION

BY MR. ORENSTEIN:

Q. Good afternoon, Mr. Titsworth.

A. Good afternoon.

Q. Would you tell the jury, please, where you live.

A. I live in Great Bend, Kansas.

Q. And is that where you're from originally?

William Titsworth - Direct

A. No, sir, it's not. I'm from Clayton, Oklahoma.

Q. What do you do for a living these days?

A. After the military, I worked for the Union Pacific Railroad.

Q. And what do you do for the railroad now?

A. Foreman for a section maintenance gang.

Q. When did you start with that?

A. September of '96.

Q. Are you married, sir?

A. Yes, sir, I am.

Q. What's your wife's name?

A. Gloria.

Q. Do you call her Chrissy?

A. Yes, sir, Chrissy.

Q. When you married Chrissy, did she have some children?

A. Yes, sir, she did. She had two daughters.

Q. What were their names?

A. Katie and Kayla.

Q. Were you and Chrissy and Katie and Kayla all together in the Murrah Building on April 19, 1995?

A. Yes, sir, we were.

Q. Was your wife and was Katie injured that day?

A. Yes, sir, they were. Both of them.

Q. Did you sustain some permanent injuries that day?

A. Yes, sir, I did.

William Titsworth - Direct

Q. Did Kayla die that day?

A. Yes, sir.

Q. Mr. Titsworth, you told us that you joined the railroad in '96 after some time in the military. Can you tell the jury what branch of the service you were in.

A. I was in the United States Army.

Q. How long had you been in the Army at the time you ended your career there?

A. 9 years, 11 months and 16 days.

Q. Is that a career for you? Were you planning to make it a career?

A. Yes, sir.

Q. Did you leave your position in the Army because of your injuries?

A. Yes, sir, I did.

Q. When you left the Army, what was your rank?  
A. Sergeant E5.  
Q. And in what parts of the world did you serve your country in the Army?  
A. I spent two tours in Korea and three different assignments in the States, Fort Dix, New Jersey; Fort Riley, Kansas and Fort Sill, Oklahoma.  
Q. Where were you stationed in April of 1995?  
A. Started out the first part of April in Fort Riley, Kansas.  
Q. And did you request a transfer?

William Titsworth - Direct

A. Yes, I did.  
Q. Why did you do that?  
A. Basically to get away from the field time there at Fort Riley. We were gone two entire months out of the year and spent a lot of time in the field.  
Q. What did you not like about the field time?  
A. It was time away from the family.  
Q. And was your request for a transfer granted?  
A. Yes, sir, it was.  
Q. Where were you transferred to?  
A. To the Oklahoma City recruiting battalion in the federal building.  
Q. That's in Oklahoma City?  
A. Yes, sir.  
Q. Were you satisfied when you found out that's where you'd be transferred to?  
A. Yes, sir, I was.  
Q. What did you think about that?  
A. I thought that was great. I mean it was a new start for me and my family, plus I was going to get to go home.  
Q. When were you supposed to report for duty in Oklahoma City?  
A. My actual reporting date was 1 May.  
Q. And did you ask to report earlier than that?  
A. Yes, sir, I did.  
Q. What was the reason for doing that?

William Titsworth - Direct

A. To go ahead, get to the recruiting battalion, sign in, and instead of burning up leave days to sign out on permissive TDY, to move my household goods from Fort Riley to Oklahoma City.  
Q. You threw in some military terms in there.  
A. I'm sorry.  
Q. Was the basic idea that you'd have some time to find a place to live?  
A. Yes, sir.  
Q. When did you arrive in Oklahoma City?  
A. The evening of the 18th of April.  
Q. What did you do when you arrived?  
A. Picked up a newspaper initially to look for houses in the area.



Q. Did you -- did you and your family go on a little car trip that night?

A. Yes, sir. After looking in the newspaper, we drove around Oklahoma City, we drove by the federal building.

Q. To see where you were going to work?

A. Yes, sir.

Q. Let me ask you to tell us about the next day, April 19, 1995. Did you go to the recruiting station in the Murrah Building that day?

A. Yes, sir. We went to the recruiting battalion. We got to the federal building about 8:30.

Q. Who was with you when you went there that morning?

William Titsworth - Direct

A. My wife, Chrissy, and Katie and Kayla.

Q. I'd like to show you --

MR. ORENSTEIN: And, your Honor, I'll offer Government's Exhibit 1437.

MR. TIGAR: No objection, your Honor.

THE COURT: Received, may be shown.

BY MR. ORENSTEIN:

Q. Mr. Titsworth, would you walk us through this photograph and tell the jury who they're looking at.

A. Yes, sir. It's a picture of myself, my wife, Chrissy, and Katie and Kayla.

Q. Chrissy is on the right-hand side of the picture?

A. Yes, sir. That's Chrissy on the right. The bottom middle is Kayla, and the upper middle is Katie.

Q. And how old on April 19 were Katie and Kayla?

A. Three and five.

Q. Katie was the older one?

A. Yes, sir.

Q. Now, these were Chrissy's children, not yours. Is that right?

A. That is correct, sir.

Q. Had you become close with them in the time that you knew Chrissy?

A. Yes, sir. I was supposed to adopt them the following month.

William Titsworth - Direct

Q. Why did you bring your family with you to the Murrah Building that day?

A. Well, you move an entire family when you move in the military. It's not just one person that goes. It's a shared experience.

Q. When you arrived at the battalion, the recruiting battalion at the 4th floor that morning, what did you do?

A. Initially, we met the secretaries that were lined up there in the hallway; and Sergeant Evans, the PAC supervisor or the administrative supervisor who was going to be my boss, took me around and introduced me to other people there in the office.

Q. Did someone find something for the girls to do while you

Q. Did someone find something for the girls to do while you were being shown around?

A. Yes, sir. Another sergeant in there had given them some toys to play with while I was being escorted around.

Q. Do you remember the explosion?

A. Yes, sir, I do.

Q. What do you remember happening after the explosion?

A. I remember everything going black. It felt like the back of my head was on fire. I kept waiting for somebody to turn the lights back on. I thought maybe the power went out in the building or something.

I felt something warm and wet on my hands. It scared me. I tried to stand up. I thought I was sitting down, but I couldn't move. After that, I just got more scared and started

William Titsworth - Direct

pushing. I got to the point where I could push, and I could see a slight crack of light. I could see the top of the federal building. I seen nothing but black smoke.

I finally got out from under what I was under, and I looked across the room and I seen my wife screaming, "Where is Kayla, where is Kayla, where is my baby?"

Q. You saw your wife.

A. Yes, sir.

Q. Did you find Katie?

A. I don't remember exactly what -- where Katie came into play; but about that time, I somehow got to my feet, and then Katie was with Chrissy at that time.

Q. Was your wife telling you anything about her condition?

A. No, sir, not at that time.

Q. Did you see what condition she was in?

A. No -- all I seen at that point is she was scared. She was screaming. It wasn't really making any sense at that point.

Q. Did you know at that point the extent of your own injuries?

A. No, sir, I didn't.

Q. You saw your wife and Katie. You couldn't find Kayla. What did you do?

A. We were told to get out of the building. Sergeant Evans told my wife to get me out of the building.

My wife carried Katie and led me out -- out of that room to the back side of the building.

William Titsworth - Direct

Q. Once you got out of the building, did you and your wife continue to look for Kayla?

A. Yes, sir. Once we got to the sidewalk, Chrissy hollered out, "There goes my baby," and pointed towards the ambulance and told me to go look.

I ran and banged on the door of the ambulance and looked inside the ambulance, and I seen a small child; but it wasn't Kayla. The only way I could recognize that it wasn't was by the tennis shoes.

Q. Why were you not able to tell any other way than by looking

at the shoes?

A. The baby was burned.

Q. After chasing down that ambulance, what did you do?

A. I made my way back to the sidewalk where Chrissy was, and Chrissy said that her ear was hurting.

I went over and tried to move her hair, and I see the blood just coming down on the right side of her head.

Q. Do you know what had happened to your wife's ear?

A. Yes, sir. She lost about a quarter-inch -- inch-and-a-quarter section of her ear that was completely severed through here and just hanging off the side.

Q. Did she go through some operation to try and reattach that?

A. Yes, sir, she did. They reattached it at the hospital there.

Q. Was your daughter, Katie, injured at all?

William Titsworth - Direct

A. Yes, sir. She received minor injuries, really. She had two pieces of glass. One was wedged in her cheek and one on the top of her head.

Q. You told us that you were injured. Were you taken to the hospital?

A. Yes, sir, I was.

Q. And did you lose consciousness after you arrived at the hospital that morning?

A. After I was at the hospital, I remember a lady saying, "This is going to hurt a little bit." And after that, I don't remember anything.

Q. That was Wednesday morning, the 19th?

A. Yes, sir.

Q. When did you wake up?

A. I'm not for sure. It was sometime either Friday night or early Saturday morning, I woke up in the hospital there.

Q. Do you know where you were in the hospital?

A. I was on the 10th floor of University Hospital.

Q. You were in the intensive care unit?

A. That was after the intensive care unit.

Q. Can you tell the jury the extent of your injuries?

A. Yes, sir. I got a piece of my skull that's missing, a little bit bigger than a 50-cent piece.

I had a major nerve on the left side of my face that was severed.

William Titsworth - Direct

I have no feeling in three fingers on my right hand.

And there is a lot of bad headaches.

Q. What kind of treatment did you receive while you were at the hospital?

A. I went through three major surgeries, one for a collapsed lung, one to remove a large piece of glass that was wedged through my neck and throat, and then another to remove bone fragments and glass from my skull.

Q. Are there still to this day glass fragments above and below your skull?

A. Yes, sir.

Q. After a time, you were released from the hospital. Is that right?

A. Say again, sir?

Q. After a time, you were released from the hospital. Is that right?

A. Yes, sir. I was released.

Q. When you were released, had all of your injuries healed yet?

A. Not healed, no, sir.

Q. I'd like to show you --

MR. ORENSTEIN: And, your Honor, I will offer Government's Exhibit 1436.

MR. TIGAR: No objection, your Honor.

THE COURT: Received, may be displayed.

William Titsworth - Direct

BY MR. ORENSTEIN:

Q. Mr. Titsworth, would you tell the jury what they're looking at in this photograph.

A. That's a picture that was taken Monday evening at the hospital -- at the hospital -- at the motel across from University Hospital.

Q. That was after you had been released?

A. Yes, sir.

Q. Did you have any difficulties when returning back to a normal life just in terms of the physical injuries you had sustained?

A. Yes, sir, I did.

Q. Can you tell the jury about that.

A. Like I said, for a long time I had some real bad headaches and sharp pains that shot through my body. Besides the fact of just going to work and looking at people, you know, and these people wanted to talk to me or say something to me but they were afraid to.

Q. Did you have any trouble eating?

A. Yes, sir, I did for about three weeks.

Q. What was that a result of?

A. I lost a little bit of weight. That was about it for that one.

Q. Did you have trouble with muscle control?

A. Yes, sir. When I got out the hospital, I was having

William Titsworth - Direct

problems with my right hand; and I didn't really think about it at the time, but I reached down trying to pick up a glass and I couldn't get my hand to close. It just went straight. I couldn't move my hand at all.

Q. I'm sorry. Go ahead.

A. And as far as eating, the nerve that was severed in my neck

and throat -- I'd literally be eating something, and things just come running out the side of my mouth.

Q. How long did that go on for?

A. It went on for about 3 or 4 months.

Q. You told us that you eventually left the Army because of your injuries. What was it about your injuries that caused you to leave the Army?

A. The military would no longer let me do PT.

Q. Let me interrupt you there. What is PT?

A. I'm sorry. Would not let me do physical training. I couldn't go outside and do pushups. I couldn't run.

As far as military duty itself, I couldn't wear a Kevlar helmet, which is the helmet required for the battle dress uniform.

Q. Why were you unable to wear a Kevlar helmet?

A. Because of the weight on top of my head and the way the helmet sit, it laid right across the hole in my head.

Q. You told us part of your injuries is a piece of your skull is missing.

William Titsworth - Direct

A. Yes, sir.

Q. Is that still true?

A. Yes, sir, it is.

Q. Did you ultimately take a medical discharge from the Army?

A. Yes, sir, I did.

Q. Had you expected that the Army would be your career?

A. Yes, sir. I already put almost 10 years in it. I wasn't about to quit.

Q. What did that do to your feelings about yourself?

A. Lowered them quite considerably.

Q. As a result of your injuries during the bombing, do you also have scars to this day?

A. Yes, sir, I do.

Q. Your right side -- the right side of your face is to the jury. Are most of the scars on the left side of your face and neck?

A. Yes, sir. Back of my head, left side of my head, and left side of my neck.

Q. Would you please turn to the jury so they can see how scarred that is.

Mr. Titsworth?

A. I'm sorry.

Q. Thank you.

You told us that you and your wife were looking for Kayla. Did you ever find her?

William Titsworth - Direct

A. No, sir. We didn't. We didn't even find out that she was deceased until Saturday morning in the hospital.

Q. Would you tell the jury what kind of person Kayla was.

A. She was wonderful. Kayla was my little helper. Like I said. it's noted that I was in the process of adopting them.

said, he's needed that I was in the process of adopting them. She wasn't my natural daughter; but when Katie and Kayla came into my life, Katie knew who her father was. Kayla was still at the age that she really didn't have quite an understanding of what was going on; so to Kayla, I was her father. You know, Kayla did everything with me.

Traditionally on holidays, I cook the turkey. She's the one that's in there with me. If I'm working on the car, working on the truck, whatever, she was the one that was right there with me.

Q. You told us that you were in the process of adopting Kayla and Katie. Did you eventually adopt Katie?

A. Yes, I did. I adopted Katie on May 19.

Q. Were you allowed to adopt Kayla?

A. No, sir, I was not.

Q. Would you tell the jury the impact that Kayla's death has had on you and on your marriage to Chrissy and on your family.

A. It's more than three or four times caused me and Chrissy to discuss divorce. There has been a lot of mental abuse between the two of us, pushing the blame off on each other.

It's just within the past few months with me and my

William Titsworth - Direct

wife being to the point where we can communicate.

Q. What has Kayla's death, the injuries that you and Katie and Chrissy all sustained -- what has that done to Katie?

A. Initially, it set her back almost to a baby stage. She quit doing things around the house. She had no urge to go to school, no urge to be around people.

This past year in school, she started to excel a little bit, and the teachers are coming home -- or teachers ain't coming home, but the teachers are saying she's doing a lot better in school. But it's taking this long for her to do well in school.

Q. Has Katie ever expressed any guilt about the bombing?

A. Yes, sir, she did. Right after the bombing, we went to my mom's house in Clayton, Oklahoma, and Katie announced to me and Chrissy that she killed her sister. And we asked her why. And she said, "I stepped on an electrical cord that set the bomb off."

I guess at the point when the bomb exploded, there was

an extension cord that was going across the floor, and she stepped on it right at the time of impact. And she thought that she set the building -- or she set the bomb off that exploded in the building.

Q. Have you had trouble convincing her that she was not responsible for her sister's death?

A. Yes, sir. And it took a lot more than just me and Chrissy.

William Titsworth - Direct

She's been through three different counselors since that time, and only within the last eight or nine months has she not

spoken of that.

MR. ORENSTEIN: Thank you, Mr. Titsworth.

That's all I have, your Honor.

THE COURT: Questions?

MR. TIGAR: No questions. Thank you.

THE COURT: You may step down. You're excused.

THE WITNESS: Thank you.

MR. MACKEY: Call Mr. Gary Campbell.

THE COURTROOM DEPUTY: Raise your right hand, please.

(Gary Campbell affirmed.)

THE COURTROOM DEPUTY: Would you have a seat, please.

Would you state your full name for the record and spell your last name.

THE WITNESS: Gary Campbell, C-A-M-P-B-E-L-L.

THE COURTROOM DEPUTY: Thank you.

MR. MACKEY: Thank you, your Honor.

DIRECT EXAMINATION

BY MR. MACKEY:

Q. Good afternoon, Mr. Campbell.

A. Hello.

Q. Where do you live?

A. Currently in Fort Worth, Texas.

Q. How long have you lived in Fort Worth?

Gary Campbell - Direct

A. Two weeks.

Q. Before that, where did you live?

A. Sherman, Texas.

Q. Lived there many years?

A. Yes. Almost 20.

Q. When did you and your family first settle in Sherman, Texas?

A. 1978.

Q. And at that time, what did your family consist of?

A. I had a wife, two daughters and a son.

Q. What were the names of your children?

A. Kimberly, Raymond and Cynthia.

Q. Were Kimberly and Raymond children from your wife's previous marriage?

A. Yes, they were.

Q. And was Cindy a daughter to you and your wife?

A. Yes.

Q. Was Cindy killed in the bombing in Oklahoma City on April 19?

A. Yes, she was.

Q. How old was Cindy at that time?

A. 26 years and 4 days.

Q. At the time that Cindy was 18 years of age, Mr. Campbell, did you and your wife divorce?

A. That's right.

Gary Campbell - Direct

Q. And what decision did Cindy make as to where she would spend her time?

A. Cindy decided to stay with me in Texas at that time.

Q. How long did the two of you reside either in the same home or in the same city before April of '95?

A. About six years.

Q. During those six years, Mr. Campbell, did Cindy Campbell finish her education?

A. Yes.

Q. Where did she go?

A. She graduated from Sherman High School that same year, in '87; and then she went to Community College in Sherman. And she graduated from there and then went to Baylor University in Waco, Texas.

Q. What degree did she obtain from Baylor?

A. She had a degree in political science.

Q. During those years, the late teens, early 20's, did you notice Cindy Campbell to be an interested young woman in the affairs of other people?

A. Cindy was a very caring person and put others before herself and did many things to help.

Q. What kinds of organizations was she an active part in in those years?

A. She was in the Big Sister program in college; and throughout high school, she worked at the local Girls Club.

Gary Campbell - Direct

Q. Were those interests that she pursued in later years as well?

A. Yes. As she graduated from Baylor, she became a juvenile probation officer in Sherman.

Q. How many years did she work as a probation officer there in Sherman?

A. Approximately two-and-a-half years.

Q. And over time, Mr. Campbell, did you learn that Cindy Campbell had made a difference to youths that she counseled as a probation officer?

A. Yes.

Q. Would you describe what you know.

A. On two separate occasions, mothers and individuals came up to me and expressed the fact that Cindy had indeed made a difference in their -- their son or daughter's life and helped them turn it around.

Q. Do you recall an occasion where one youth that she had counseled came back to the probation officer and reported --

A. That's right.

Q. -- his success? Could you tell us that story?

A. Her boss related this story to me and others. We set up a small scholarship fund for Cindy at the high school, and her boss at the probation is the one that gives the scholarship or makes the award.

And he always relates a story about Cindy, talks about



Gary Campbell - Direct

her. And the story this last May was the fact that a young man came in the probation office, was not dressed as most kids that come to the probation office are dressed. He was very neatly dressed, had on white shirt and a tie. And he walked in and he said, "I want to see Cindy Campbell."

And the secretary got her boss. He came out and he said, "Well, Cindy is no longer here."

And he said, "Well, I need to tell Cindy that I made it." He said, "Thanks to her, I have a wife, a son, I graduated from high school, and I have a good job. And I wanted Cindy to know."

Q. Did Cindy love her work as a juvenile probation officer?

A. Very much. Very much. She spent -- spent many nights riding with the local police, making sure that her kids were on curfew; that they were in fact at home. She spent many hours at the high school roaming the halls, making sure that her kids, as she called them, were, in fact, in class and at school.

Q. When she left her job as a probation officer, what new career did she start?

A. She became a Secret Service agent.

Q. And approximately when was that?

A. Her initial training, I believe, started in September of 1993.

Q. And how did that come about that she became a Secret

Gary Campbell - Direct

Service agent?

A. One of her kids had written a letter threatening the life of the President. And as part of her duty, she reported that to the Secret Service in Dallas.

They subsequently came up to interview the young man, in the course, interviewed Cindy to find out more about him and his family and at that time asked her if she'd be interested in coming to Dallas to visit their offices. And from that, it led to their requesting her to make application to the Secret Service.

Q. Did you and your daughter talk about the decision that she was to make about leaving work as a probation officer --

A. Yes.

Q. -- and moving into the Secret Service?

A. We did. And we struggled with it. She liked what she was doing so much. And -- but then on the other hand, she saw it as a once-in-a-lifetime opportunity to do something that few people get the honor and privilege to do.

Q. When Cindy first became a Secret Service agent, did she have to take a long training course?

A. Yes. It was almost a year.

Q. And was there anything in the course of that training that changed her life?

A. Very much so. She met her future husband, Ron Brown, during the training.

Gary Campbell - Direct

Q. And was Mr. Brown also a Secret Service agent?

A. Yes.

Q. When were Cindy and Ron Brown married?

A. They were married March 11, 1995.

Q. Approximately five weeks before the bombing?

A. That's correct.

Q. At the time of the bombing, where was Cindy Campbell-Brown's station with the Secret Service?

A. Oklahoma City.

Q. And where was Agent Brown's?

A. He was stationed in Phoenix, Arizona, at that time.

Q. Given that the two agents were married, had any request been made that they be relocated to the same city?

A. Yes. In fact, it had already been approved. They were in the process of being transferred to Washington, D.C.

Q. Do you know when their report date was for joining together in Washington, D.C.?

A. It was like within 30 days, I believe. They were -- they were to leave the week following the bombing for their first house-hunting trip; and normally once you find a home, it's fairly quickly after that.

Q. Mr. Campbell, did your daughter on many occasions express her care and concern and love for you?

A. Yes. Cindy and I had a very special relationship and I think sometimes very unique. I know at her wedding, our dance

Gary Campbell - Direct

was "You Are the Wind Beneath My Wings," and she played that or chose that because that's how she felt about me. But when I danced with her, I knew Cindy -- this is about you and what you do for me. And that's the relationship that we had.

Q. As her father, were you concerned as she launched a career with the Secret Service that she would be out of touch; that you might not know where she was or what she was doing?

A. Yes. I always worried about where she was; and that was kind of an inside joke because when she chose to live with me, she said, "Dad, what are the rules?"

And I said, "I have one rule." I said, "You let me know where you are."

So the last Christmas, my present was a map on the wall with red and blue pins, the red pins for Cindy, the blue pins for Ron; and a pin was placed in every city that they went to. And she said, "Dad, now you'll know where I am all the time."

Q. Mr. Campbell, was your daughter a woman with quick wit and a sense of humor?

A. Yes, she was.

Q. And did she sometimes combine that quality with her care and concern for her mother?

A. Yes. In fact, the Christmas present to her mother, the

fact that her mother had moved from Texas and had not had the opportunity to visit her at Baylor or see the campus -- she and

Gary Campbell - Direct

her roommate made a video where her roommate held the camera and knocked on the door, and Cindy did the, "Hello, Mom, come on in." And they took a tour of the campus, went to the cafeteria, had lunch, did the whole thing. It was really cute and meant a lot to her mother.

Q. At one point in the video, did they show some footage of the library there at Baylor?

A. Yes. And Cindy was always an overachiever, and it was so unlike her. And they were standing in front of the library -- or Cindy was, and said, "Mom, they tell me this is the library."

Q. Did you travel from Sherman, Texas, to Oklahoma City the weekend of April 8 and 9 of 1995?

A. Yes, I did.

Q. And why did you do that?

A. It was an early birthday celebration. Cindy's birthday was the 15th of April, and she was going to Phoenix to be with Ron and celebrate her birthday and Easter, so I went up a week early to take her out to dinner and celebrate her birthday.

Q. Did you and your daughter visit the offices of the U.S. Secret Service in downtown Oklahoma City that weekend?

A. Yes, we did.

Q. Describe to the jury what happened.

A. We went to dinner. We went up to the offices, and Cindy being a new agent was just so proud of what she was doing. And

Gary Campbell - Direct

we went through the other agents' offices as their doors were opened. And she pointed out, "This is Alan Whicher's office, Mickey Maroney, Don Leonard, 's," etc. and pointed out their plaques and mementos that they had collected over the years. And she was just so excited that one day, she said, "Dad I'll have mementos like this and have been to the places that these fellows have been."

Q. At that point in time, Mr. Campbell, had you met or talked to any of the fellow Secret Service agents that Cindy was assigned to in Oklahoma City?

A. Yes. I had met most of them briefly, just mainly to say hello and who I was and to visit with a little bit.

Q. And what was your reaction about the corps of people assigned to that office there in Oklahoma City, as a father?

A. I was very pleased. I felt Cindy had a group of surrogate fathers, if you will, seasoned veterans that would show her the ropes, take care of her, and make sure that she got off to a good start as a Secret Service agent.

Q. Mr. Campbell, how did you first learn of the bombing in Oklahoma City?

A. A friend of mine called me at work and told me that he had heard a building had been bombed in Oklahoma City. He was not

heard a building had been bombed in Oklahoma City. He was not sure if it was a federal building or a state building. And he was not sure of what building Cindy worked in, but he was concerned and thought that I should know.

Gary Campbell - Direct

Q. And after learning that in fact it was your daughter's building, did you travel to Oklahoma City?

A. Yes. I went home -- well, I called some friends and went home and put some belongings together and drove to Oklahoma City.

Q. When were you notified as Cindy's father of her death?

A. It was April 20, around 7 p.m.

Q. Mr. Campbell, could you tell the jury in your own words who Cindy Campbell-Brown was as you knew her?

A. Cindy was a very loving, caring person, one that put others before her.

She was a super sister, a super daughter. She enjoyed life to the fullest.

She was one, I felt, that had made a difference based on what people have told me. And she's one that I feel that we will all miss because I feel like she's -- she would have made a bigger difference had she lived.

Q. Could you describe the relationship that Cindy had with her sister or -- excuse me -- sister, Kimberly, and her brother, Greg?

A. It was, I would say, probably best of all, a mutual admiration society. They were very close in age. Kimberly tended to be very smart, very artistic and athletic.

My son was very athletic, a marine. And Cindy drew her strengths, her athleticism and love for athletics and that

Gary Campbell - Direct

side from her brother; and yet the academics and I guess ambition from her older sister, the push to be the best that she could.

Q. And do you know that each of those siblings miss Cindy?

A. Very much so. And it's -- it's never been this is my stepsister, this is my stepbrother. We were all together from such an early age, and in the family we tried to make no difference as to stepchildren, etc.

And I think -- that made a bond between them. If you would ask them -- and I know that, you know, that's their sister, not their stepsister. It was neat. They looked out for each other. They took care of each other. They argued, never fought; but it was special.

Q. Speaking for you, Gary Campbell, could you tell the jury the impact of your daughter's death on you.

A. I've cried about that, trying to think what I would try to have people understand. It's very difficult to put into words.

Having been divorced and living basically alone, you always have someone that you look to to push you to the next

level or to encourage you, the one you do things for.

And Cindy was that part of me. And when I lost her, I've just -- everything is kind of hollow now. The things that come just don't mean the same, because she was always so excited to share things, so excited to hear about what you were doing, so excited to say, "Way to go, Dad." And now that's not

Gary Campbell - Direct

there. And so I don't know; it's very difficult. It's just an empty feeling.

Q. Mr. Campbell, let me ask you to take a look, please, at Government's Exhibit 1171A.

MR. MACKEY: Which we move into admission.

MR. TIGAR: No objection, your Honor.

THE COURT: Received, may be shown.

BY MR. MACKEY:

Q. Mr. Campbell, is this the daughter who died on April 19, 1995?

A. Yes, it is.

MR. MACKEY: Nothing else.

THE COURT: Any questions?

MR. TIGAR: No questions, your Honor.

THE COURT: You may step down. You're excused.

Next, please.

MR. MACKEY: Your Honor, we'll call Barb Trent.

THE COURTROOM DEPUTY: Would you raise your right hand, please.

(Barbara Trent affirmed.)

THE COURTROOM DEPUTY: Would you have a seat, please.

Would you state your full name for the record and spell your last name.

THE WITNESS: Barbara Jean Trent, T-R-E-N-T.

THE COURTROOM DEPUTY: Thank you.

THE COURT: Ms. Wilkinson.

MS. WILKINSON: Thank you, your Honor.

DIRECT EXAMINATION

BY MS. WILKINSON:

Q. Good afternoon, Ms. Trent.

Could you tell the jury where you live now.

A. Harrah, Oklahoma.

Q. And where is that in relationship to Oklahoma City?

A. 45 minutes east.

Q. Are you married?

A. Uh-huh.

Q. What's your husband's name?

A. Roy.

Q. Could you tell the jury how old you are, please.

A. 34.

Q. And could you share with them a little bit about your family, how many sisters you have?

A. I have three older sisters, 40, 44 -- I mean 43 and 44.

Q. Are you the baby of the family?

A. Yeah.

Q. And could you tell the jury your parents' names.

A. Dr. Charles and Jean Hurlburt.

Q. Were your parents killed in the bombing of the Murrah Building on April 19, 1995?

A. Yes, they were.

Barbara Trent - Direct

Q. How old were your parents when they died?

A. My father was 73 -- excuse me -- and my mom was 67.

Q. Was he the oldest, your father, the oldest victim --

A. Yes.

Q. -- of the Murrah Building bombing?

Could you share with the jury a little bit about who your parents were. Start with your dad. Where was he born and what was his background?

A. My dad was born in Africa, and his parents were missionaries. And he was raised there, five brothers and three sisters -- they were raised there.

He came to the States to Wheaton, Illinois, when he was 24, and he went to school there, got a degree in dentistry.

Q. Did he graduate from Wheaton College?

A. Yes.

Q. And did he go on to dental school at the University of Illinois?

A. Yes.

Q. Did he meet someone at Wheaton College?

A. Yes. He met my mother. She grew up in Decatur, Texas, and then went to Wheaton, Illinois; and she became a nurse, so . . . And they met there, and after a few years got married.

Q. And you said you had an older sister who is approximately 44? Is that right?

Barbara Trent - Direct

A. Uh-huh.

Q. What's her name?

A. Betty Palmer.

Q. And after she was born, did your parents decide to become missionaries themselves?

A. Yes. My mom and dad, after they were married, after they had my two oldest sisters, went back to Africa to be medical missionaries, my dad to do dental work and my mom as a nurse. They were there about five years. My next sister, next in age to me, was born there.

Then they came back to Illinois, and that's where I was born, in Naperville.

Q. Now, your older sister you said was Betty.

A. Correct.

Q. And then your next sister is 43?

A. Is Dawn, Dawn Basher.

Q. And she was born also before your parents went to Africa?

A. Yes, in Illinois.

Q. And your third sister's name?

- A. Sherry Elliott, and she was born in Africa.  
Q. Where in Africa did your parents serve?  
A. The Belgian Congo.  
Q. Do you know what kind of medical missionary work they did?  
A. Medical -- basically medical, doing medical missions.  
Q. When your father came back, did he develop a private

Barbara Trent - Direct

practice?

- A. He did for a while in Illinois. And then he became a professor at one of the universities in Illinois. Then from there, we -- when I was age 6, we moved to Birmingham, Alabama, and that's where he got his master's degree in radiology.  
Q. Did he then become a dental radiologist?  
A. A dental radiologist.  
Q. And was that his specialty from that time on?  
A. Yes.  
Q. Now, when your folks lived in Birmingham, do you recall how long they lived there?  
A. Three years.  
Q. And did they develop relationships with some of the community members there in Birmingham?  
A. Yes. Shades Mountain Bible Church that they went there. And I'm -- I can't recall with my age all the other events my mom was involved in.  
Q. Does your sister live in Alabama now?  
A. She does now.  
Q. After your parents were killed, did some of those people in Birmingham express some of the good deeds that your parents had done in that community?  
A. Yes. They all pitched in, and my sisters came down about two days after the bombing and they helped watch -- helped them with their kids; and they all pitched in. And a lot of them

Barbara Trent - Direct

- knew Mom and Dad well, so they were trying to help us as much as they could.  
Q. After your folks left Birmingham, where did they move?  
A. To Oklahoma City.  
Q. Is that where they resided until they were killed?  
A. Yes.  
Q. Do you remember what -- approximately what year they moved to Oklahoma City?  
A. I can't.  
Q. Was it around 1973?  
A. Yeah. It's -- they were there for 23 years.  
Q. Are you a little nervous?  
A. Yes, I am. Sorry.  
Q. There is water there, if you --  
A. I'm sorry.  
Q. -- if you want to help yourself.

Now, when your father moved to Oklahoma City, did he teach or did he develop a private practice?

teach, or did he develop a private practice.

A. No, he became a dental radiologist at the OU Health Science Center.

Q. Did your mother work?

A. She did. She worked at Deaconess Hospital as an RN.

Q. Where is Deaconess Hospital?

A. In Oklahoma City.

Q. For how many years did your mother work as a nurse at

Barbara Trent - Direct

Deaconess?

A. 23 years.

Q. Was she working there at or around the time of her death?

A. Yes. She was working part-time, and I was also working there. I've been there 10 years.

Q. Tell the jury what you did.

A. I'm an RN -- after my mother -- became a nurse. And I worked there with her. We worked on separate floors, but we worked there together.

Q. Now, tell the jury a little bit about your routine of how often you saw your mother in those days and months before the bombing at Deaconess Hospital.

A. Well, I never -- I didn't live with them in their home, but I never lived out of state away from them. And we were very, very close. I saw Mom -- she worked part-time at that time. I'd go up and see her at lunch or eat lunch with her; or after work, I'd go over after work to their house. I had my own key, go over there on the weekends, you know. We were just really close. We did a lot.

Q. Now, while your mother worked part-time, did your father come to a point in his career where he retired from teaching?

A. He did. He retired in 1989. And at that time, Mom's -- when she became 65, she had to work less because of Social Security, but she was still working part-time.

Q. Did your father do volunteer activities after that time?

Barbara Trent - Direct

A. He and Mom -- he and Mom did a lot together, and Mom got them involved with training with the Red Cross; and they were doing that for a full year before they were killed. They were actually being trained for emergencies to help out, so they were going through all the training classes.

Q. How long was that training?

A. For a year. They had done that for a full year.

Q. Let's turn to April 19, 1995. Were you at work in Deaconess Hospital on the morning of the bombing?

A. Yes. I work in an outpatient surgery area, but our area is a central area where when there are any disasters, they will come through our area.

And so we are kind of the triage area. And that morning, we heard a major thump, and we thought it was -- there were some -- there was some construction going on, and we thought something had happened upstairs. And then we looked on



TV and we saw the Murrah Building.

Q. Now, at that point, did you have any reason to believe that your parents were in the Murrah Building?

A. I thought my mom would be called in to come help, and so I --

Q. Did you worry about her that morning?

A. Not -- my husband was trying to get hold of all of our family members just to make sure. I didn't think any different. When she didn't come in after a few hours and I

Barbara Trent - Direct

didn't hear from her, it was just assumed that she and Dad were helping with the Red Cross because that's what they were doing; and so I thought, okay, they're helping with the Red Cross and they're down there helping people out. So I just figured she'd call me later.

Q. Did you hear from her that evening?

A. No, and we called them and called them. I started getting a little worried, but I thought it couldn't be.

So I called the church, because I thought they probably went on there from -- to choir practice.

And the man that answered the phone couldn't tell me if they were. And I thought, okay, they're probably still out helping; and so my husband called through the night. And then I called from 2 a.m. in the morning on. Then I started worrying and I called the house. And I thought, well, they're out there helping, but Mom will for sure -- it was just strange that she didn't call me because she'd always call me with anything. She'd call just to check on me.

Q. Did you have to go work that morning on April 20?

A. I went to work at 6 a.m., and I thought for sure she would call me.

Q. Why did you think she would call you at work?

A. I thought, okay, she's going to let me know because she didn't want to wake me up through the night, and she's going to call me and let me know she's coming home -- I'm going to be at

Barbara Trent - Direct

work -- and let me know -- I mean, you know, make sure everything's okay and that she's okay and that she and Daddy had been helping. And at 9:00, I was waiting; and a friend from their church was trying to help find them and couldn't, so I decided to leave work and go over to their house. And I let myself in.

Q. What did you find?

A. I thought for sure -- my dad had some heart problems and a pacemaker -- I thought, okay, I'll check in the cabinet to see if there is -- his heart pills, because if he's there helping, then he'll have his heart pills with him. So I opened the cabinet, and his heart pills were there; and my heart sank. And I spotted a folder by the phone, and I rapidly went through it. And I opened the middle that said, "If you have any

questions about your Social Security, please come to the Alfred P. Murrah Federal Building."

And then I called my sisters and I went frantic. I called my sisters; and they said, "Oh, Barb, you know, you know, everything -- it's fine. Nothing is wrong."

And I called my husband, and he left to go up and look. So he went downtown. And he went to the Red Cross, because I had called the Red Cross and they had said a lot of people had been volunteering to help but weren't signed in.

Q. Were you trying to see if your parents had been volunteers at the Red Cross?

Barbara Trent - Direct

A. Yeah.

Q. Did there come a time, Mrs. Trent, when you learned that your parents' car was found in the vicinity of the Murrah Building?

A. That day when I went to their house at 4 p.m., the FBI called and said that their van was found in the -- on that block in the crime scene.

Q. Did you later learn that both of your parents had gone down to Social Security that morning?

A. Yes. We figured that where one was, the other -- they always did everything together. So we didn't know. May 4, after two-and-a-half weeks, the -- until when they stopped the final search. They were -- with the last group to be found. So we didn't know that whole time. We assumed that that's where they were because their van was down there; and then they found them, found their bodies that day.

Q. So you were told on May 4 about --

A. Yes.

Q. -- the identification of your parents?

A. Yes.

Q. Could you tell us a little bit about what type of person your mother was.

A. Absolutely wonderful. My parents were so loving, and they brought us up in a Christian home; and they not only told us they loved us all the years growing up, they showed it. And my

Barbara Trent - Direct

Mom constantly told me how proud she was.

And just the little memories I have: When I'd go see her on the floor after work, she'd take me and say, "I want you to meet one of my patients." And she'd pull me into one of the rooms with the patients, and she said, "This is my daughter." And she just got a big smile like she was so proud of me, and it just made me feel so good, those memories.

Q. Was she an outgoing person?

A. She was very outgoing, very hospitable to other people, always giving. She would after work go spend time with her patients. So many times she was late -- growing up -- she was late getting home because she'd go sit with her patients and spend time talking to some of the people. I've had many

spend time talking to some of the people. I've had many patients later on that have told me that they remember Mom and how she took care of their husband dying and how much she had meant to them.

Q. What kind of person was your father?

A. He was very -- the gentlest, kindest man you'd ever meet. An example of how other people thought of him: A friend of mine went to a dentist and she asked, "You know Charles Hurlburt? You know, he worked at the dental school."

He goes, "Why, yes, I had worked with him for 10 years."

And it wasn't a name I recognized. And upon talking about Dad, he cried and had to leave the room. Daddy -- they

Barbara Trent - Direct

all loved Dad. He was just -- he just loved people. And they -- at the dental school, they had a scholarship for a student that showed qualities like Dad that had made good grades and yet was kind to other people.

Q. Could you tell the jury what kind of impact it's had on you personally to lose both of your parents?

A. Personally, my parents were truly some of the finest people and the biggest support of my life. And I have missed them very, very, very much.

It's been very hard for me in the realms of working. I tried to go back to my job; and I worked for six weeks, and then the stress became incredible with trying to make critical decisions in the area that I work. It was hard -- it was very stressful to make those decisions, so I decided to take a leave.

Q. Did you see an impact on the patients you were treating because of your condition?

A. No. I continued to do my job well, but I felt that I was too stressed to make those kind of decisions. And I didn't want to -- I didn't want to -- I did not want to be a negligent nurse.

And so I took a leave, and then I went part-time, and I've been part-time since. And I'm -- I am hoping to go back full-time soon. I'm -- I'm starting to come around finally and would like to go back full-time, but it's -- up to this time, I

Barbara Trent - Direct

have been -- had trouble with physical illness.

Q. Have you had respiratory problems?

A. My asthma. I've been in the hospital with severe respiratory problems due to -- and my doctors have even said, "This is all due to your being stressed. Your immune system is down."

Q. In the hospital in Deaconess -- are you there part-time now?

A. Yes.

Q. Do you engage in disaster drills?

A. Yes.

Q. And has there been an impact on you due to the loss of your parents and how you carry out your role in disaster drills?

A. That is very hard. We've had quite a few disaster drills since this has all happened so we could be well-equipped next time it does; but every time they have one, it does -- it really -- it upsets me. It really does. And it's hard to think when that happens because I just flash back. And I have to just leave what I'm doing and go get myself together and let -- sometimes let the other nurses handle it, although it is just a drill. I don't feel equipped at this point to handle that.

Q. Do some of your -- do you have any children, Mrs. Trent?

A. No, I don't.

Q. Do some of your sisters have children?

Barbara Trent - Direct

A. They all have three kids apiece.

Q. I'd like to show you Government's Exhibit 2223 --

MS. WILKINSON: Which we would offer into evidence.

MR. TIGAR: No objection, your Honor.

THE COURT: Received, may be shown.

BY MS. WILKINSON:

Q. Tell the jury who is in this picture, Mrs. Trent.

A. That's my mom and my dad and my little nephew, Phillip.

Q. Whose son is he?

A. Sherry.

Q. Could you tell the jury the impact on the rest of your family, your sisters and your nieces and nephews, the impact that the loss of your parents has had on them.

A. It's been hard on all of them and even my nieces and nephews, their grandchildren -- they -- my parents really, really got to know their grandkids. They spent a lot of time with them. Whenever they'd baby-sit for my sisters -- although my sisters are out of state now, at different times in their life, they did live in Oklahoma. And my mom and dad spent a lot of time with the kids and -- and it was just fun, because I remember when they would take care of them, they just didn't push them to the side and make them watch TV. They spent their days doing things for the kids. I mean their whole day, they did things that the kids would enjoy. They really focused, they really focused on the kids to make them feel important.

Barbara Trent - Direct

Q. Finally, Mrs. Trent, could you express to the jury the impact on the community of losing your parents.

A. There were -- there have been many -- my mom and dad were involved in many different activities in the church, in helping, volunteering with the Red Cross, at the hospital, you know, just different areas that they knew people. There have been many people that have come up to me after all this and said how much they loved Mom and Dad.

They named the -- the nurses loved Mom so much, they named one of the day rooms where they put the patients in the "Hurlburt Hospitality Room," because that was what they thought of Mom. They really loved Mom and her hospitality, and -- she cared. She had people over to the house a lot. She cared about individual people. She did a lot for people. Always at different holidays, she always had people over because she didn't want people to be left out if they didn't have a place to go. She had gifts for them. She remembered people, she and Daddy together, so . . .

MS. WILKINSON: Thank you very much, Mrs. Trent.

No further questions, your Honor.

THE COURT: Any questions?

MR. TIGAR: No, no questions, your Honor.

THE COURT: You may step down. You're excused.

Next?

MR. MACKEY: We'll call Mr. Michael Reyes.

THE COURT: Thank you.

THE COURTROOM DEPUTY: Would you raise your right hand, please.

(Michael Reyes affirmed.)

THE COURTROOM DEPUTY: Would you have a seat, please.

Would you state your full name for the record and spell your last name.

THE WITNESS: Michael Reyes, R-E-Y-E-S.

THE COURTROOM DEPUTY: Thank you.

DIRECT EXAMINATION

BY MR. MACKEY:

Q. Good afternoon, Mr. Reyes.

A. Hi.

Q. Tell the jury, please, where you live.

A. I live in Bethany, Oklahoma.

Q. Is that near Oklahoma City?

A. It's a suburb.

Q. How old are you?

A. 33.

Q. And how long have you lived in Oklahoma City or the area?

A. 20 years.

Q. What's your educational background?

A. I have a degree in accounting from Oklahoma State University.

Q. And when was that awarded?

Michael Reyes - Direct

A. 1989.

Q. Mr. Reyes, for whom do you presently work?

A. I work for the Department of Housing and Urban Development.

Q. And how long have you worked for HUD?

A. Nine years.

Q. What's your current assignment or duty?

A. I'm a housing specialist in the single-family division at

HUD. We basically work with FHA loans.

Q. Mr. Reyes, I want to direct your attention now to April 19, 1985, and what's your name written in the March 1985

1995, and ask if you were working in the Murrah Building on that day.

A. Yes, I was.

Q. Let me show you Government's Exhibit 952G. It's already admitted into evidence.

You see that before you?

A. Yes, sir.

Q. Is that an accurate floor plan of the HUD work area on the 7th floor in the Murrah Building?

A. Yes, sir.

Q. Mr. Reyes, if you take your pen -- it's the one with the cord to -- yes. Reach down beneath the surface and press on the monitor. Mark an X where your work station was on April 19, 1995.

A. I didn't mean to -- I mean it to be farther to my left.

Q. You can press the button and try one more time.

Michael Reyes - Direct

So space was tight and you were sitting on the ledge. Is -- let me ask this way, Mr. Reyes. How far from the south wall was your desk?

A. About 4 feet.

Q. At 9:02 on April 19, 1995, were you sitting at your desk?

A. Yes, sir.

Q. Tell me what happened.

A. I was working on my files and the power went off. I thought that was very strange because the power had never gone off before. And then I started to hear a rumbling sound, and I thought that perhaps we were experiencing an earthquake, even though Oklahoma really doesn't get earthquakes.

So I knew that people in earthquakes usually hide under things, so I thought I'd jump under my desk. And when I went to do that, the floor wasn't there. And I was in a head-first dive, in a free fall. And I knew at that time that I had maybe 5 seconds to live.

Q. Were you thinking to yourself, Mr. Reyes, about your condition and the dangers you were experiencing at that moment?

A. I was saying to myself that I did not want to die and that this wasn't real, but -- in my mind, I knew I was about to die.

Q. Go ahead.

A. I was going to hit bottom somewhere and that would be it.

Q. Do you remember striking bottom?

A. I don't actually remember striking bottom.

Michael Reyes - Direct

Q. What do you remember next?

A. The next thing I remember is I'm in a position -- in a crouched position up to my waist in rubble and my arms are kind of tangled in the -- the steel supports for the temporary walls on the 3d floor.

Q. Mr. Reyes, when you landed on the 3d floor after your fall from the 7th floor, did you see other persons around you?

A. I saw about six people that worked in that office. That

... I saw about six people that worked in that office. That was the office of Health and Human Services.

Q. And did some of those people immediately come to your aid?

A. As -- the first thing I remember is that a man said, "Is everyone all right?"

And I said, "Help me."

And he was surprised to see me. He asked where I came from, and I said the 7th floor.

He said, "Oh, my God." And he said, "Stay there. We'll clear a path to get to you." And they did that.

Then they took me -- I was very bloody, and they took me over to the wall and had me lean against a bookcase while they worked on getting an escape path out of the building.

Q. What was your physical condition? What injuries have you suffered as a result of that fall?

A. I had a pretty good gash right here on my left temple, left part of my chin, my right eye. I had a pretty good gash on my wrist. I didn't know it at the time, but two bones in my

Michael Reyes - Direct

pelvis had separated.

My right leg from mid thigh down was a complete bruise. My lower lumbar area was a complete bruise, and I had pockmarks all over my face and my legs. I had a gash on each shoulder blade. That's about all I can think of.

Q. In time and with the help of others, were you able to get out of the Murrah Building that morning?

A. Yes.

Q. And how exactly did you do so?

A. The people from Health and Human Services decided that the best way to get out would be to climb out on the ledge on the 3d floor and work our way down onto the plaza level, which is one floor lower. And so they had someone try it first to see if it would work. And they said if that worked, you're going next.

And I said, "I don't think I can do that."

And they said, "Well, you have to."

So I tried it, and that's how I got onto the plaza, and then people helped me over to 4th and Harvey to a triage area.

Q. Mr. Reyes, let me show you Government's Exhibit 968, which is already in evidence.

With the same pen, could you illustrate for the jury where exactly it was that you fell from the 7th to the 3d floor on that photograph.

Michael Reyes - Direct

A. This is the 7th-floor area right here, and this is about the 3d-floor area, so I fell like that pretty much.

Q. Mr. Reyes, do you know of any other person inside the Murrah Building that was above the 4th floor and fell that survived other than you?

A. One person.

Q. How long were you in the hospital, Mr. Reyes?

A. 24 hours.

Q. And after your release, did you stay at home then to recover from your own injuries?

A. I went to my parents' house.

Q. Mr. Reyes, on April 19, 1995, were you the only Reyes that was employed and working at HUD?

A. No. My father worked there, also.

Q. What was his name?

A. His name was Antonio Reyes.

Q. And on what floor in that same building did Mr. Antonio Reyes work?

A. He worked on the 8th floor.

Q. After you had escaped the building that morning and were laying on the gurney which you described, do you remember inquiring about your father?

A. Yes. A lady from work found me and she asked if I was okay.

And I asked about my father, and I asked if she had

Michael Reyes - Direct

seen him.

And she said, "No, but do you realize what the building looks like?"

And I knew pretty much what the building looked like, but I just -- the reality of it all had not hit me. I could not believe that what had happened had happened.

Q. Did you know where your father's work station was on the 8th floor?

A. Yes.

Q. Where was it?

A. About 5 feet south of the north wall on the 8th floor, just east of the center of the building.

Q. In the course of time, Mr. Reyes, did you learn that your father had died as a result of his fall from the 8th floor of the Murrah Building?

A. On April 29.

Q. That is when you were notified?

A. That's when we were notified.

Q. If we can take a moment, Mr. Reyes, and tell the jury, please, something about Tony Reyes, your father. Would you let them know about his upbringing, first.

A. He was born in a small town in south Texas. He was the seventh of nine children. His father was a rancher. And he joined the Navy when he was 18.

He retired from the Navy. He had a lot of -- a lot of

Michael Reyes - Direct

awards and honors during his service in the Navy. And when he retired, he came to work for HUD.



Q. How many total years did he serve in the U.S. Navy?

A. 26.

Q. And what was the nature of his assignments?

A. The majority of the time, he was stationed on naval vessels. The last was the aircraft carrier U.S.S. Independence. He had been on submarines, destroyers. He participated in the Cuban Missile Crisis.

Q. In 1977, was he assigned while still in the Navy to Oklahoma City?

A. Yes.

Q. To do what?

A. He was transferred to the Navy recruiting office in Oklahoma City.

Q. At that time, what did the Reyes family consist of?

A. My mom and dad and my older sister.

Q. And what's her name?

A. Dahua Northrup.

Q. And your mother's name?

A. Dora Reyes.

Q. After working for a few years there in Oklahoma City, did he receive an assignment outside of Oklahoma City?

A. Yes. He was -- received orders to report to the U.S.S. Independence based in Virginia.

Michael Reyes - Direct

Q. And when he left to honor those assignments, what did the rest of the Reyes family do?

A. We stayed put. We were just going to keep our life in Oklahoma. He would be back in 18 months.

Q. And he returned?

A. And he returned.

Q. And the four of you then continued residing in Oklahoma City?

A. (Witness nods head.)

Q. How does your mother make a living?

A. She's a self-employed CPA.

Q. And your sister?

A. She's a special education teacher in Kansas.

Q. Mr. Reyes, could you tell the members of the jury how long your father worked in the public sector -- that is, for HUD or other federal agencies -- after his retirement from the Navy?

A. 11 years.

Q. Was that all in Oklahoma City?

A. Yes.

Q. In the course of that time, did he receive various honors and awards that you can speak to as a result of that service?

A. Yes. In 1993, he was awarded employee of the year from the Federal Executive Board in Oklahoma City.

Q. Was your father also active in various community organizations in Oklahoma City?

Michael Reyes - Direct

A. 163.

Q. What were some of those?

A. Some of those. He was active with the Eagle Ridge Institute, which is a nonprofit organization that helps at-risk teenagers and young adults to learn life skills and to better themselves.

He was on the board of directors of the Federal Employees Credit Union, which is a volunteer post; and he was also very much involved with the Latino Community Development Agency, which is another nonprofit organization in Oklahoma City.

Q. Were children and futures of children important to your father?

A. Absolutely.

Q. How did he demonstrate that to you?

A. He spent a lot of time both at the Eagle Ridge Institute and at the Latino Community Development Agency to help children, because he felt that through education and mentoring that since children were our future that that would better the world when they grew up.

Q. Mr. Reyes, let me show you at this time Government's Exhibit 1462 that I'll now offer.

MR. TIGAR: No objection, your Honor.

THE COURT: 1462 is received, may be shown.

BY MR. MACKEY:

Michael Reyes - Direct

Q. Mr. Reyes, let's start with yourself on the far left-hand corner of that exhibit, and tell the members of the jury by name the persons shown in that photo.

A. Okay. The far left is me.

The upper, going clockwise, at the top, that's my father.

And then my mother on the right, and my sister at the bottom.

Q. How old was Tony Reyes at the time of his death?

A. He was 55.

Q. Now some two-and-a-half years later, Mr. Reyes, could you describe to this jury what impact his death at that age has had upon your mother.

A. Well, the first thing that comes to mind is they had already begun outlining what they were going to do in retirement. They had built a house north of Oklahoma City out in the country that they were going to live out their lives in, and one of the first major things my mom did was sell the house because it's not something that she could take care of by herself. So she moved into a smaller house.

She doesn't have her best friend anymore. She doesn't have someone to travel with or to visit relatives with, and she doesn't have someone living in the house that can do a lot of the handyman stuff around the house. That's me, but I live 30 miles away.

Michael Reyes - Direct

Q. How about for your sister? What does your father's death mean?

A. Well, she's a self-proclaimed daddy's girl, and Dad meant everything to her, plus the fact that she has two small children; and my parents made it a point of seeing them at least once a month to watch them grow up, and now they don't have their grandfather. And it's not as easy for Mom to take care of the grandchildren once a month.

Q. And for you? What has it meant the most?

A. I don't have anyone that I can turn to for advice very easily, especially at work.

Q. Was your father a friend?

A. Absolutely.

Q. And an advisor?

A. Yes.

MR. MACKEY: Thanks, Mr. Reyes.

MR. TIGAR: No questions, sir. Thank you.

THE COURT: You may step down. You're excused.

Next, please.

MR. MACKEY: Yes, your Honor. We'll call Mr. Lyle Cousins.

THE COURTROOM DEPUTY: Raise your right hand, please.

(Lyle Cousins affirmed.)

THE COURTROOM DEPUTY: Would you have a seat, please.

Would you state your full name for the record and spell your last name.

THE WITNESS: My name is Lyle Marshall Cousins, Jr., C-O-U-S-I-N-S.

THE COURTROOM DEPUTY: Thank you.

THE COURT: Proceed.

MR. ORENSTEIN: Thank you, your Honor.

DIRECT EXAMINATION

BY MR. ORENSTEIN:

Q. Good afternoon, Mr. Cousins.

Where are you from, sir?

A. Oklahoma City.

Q. How long have you been living in Oklahoma City?

A. About -- totally about 10 years.

Q. Where did you grow up?

A. In -- born and raised in -- around Flint, Michigan, and Houston for a few years and then Oklahoma City.

Q. What do you do for a living, sir?

A. I drive a truck locally in Oklahoma City.

Q. Before that, were you an over-the-road trucker?

A. Yes.

Q. Mr. Cousins, are you married?

A. No.

Q. Have you been married?

A. Yes.

Q. Who were you married to?

Lyle Cousins - Direct

A. Kim Cousins.

Q. Did she die in the bombing in Oklahoma City?

A. Yes, she did.

Q. When she died, where was your wife working?

A. She worked for the Department of Housing and Urban Development.

Q. And that was your wife, Kim?

A. I beg your pardon?

Q. Your wife's name was Kim?

A. Was Kim, right.

Q. When you met Kim -- when did you meet Kim, first of all?

A. I met her at church. It was my first day attending Sunday school at a church I had just joined about a month prior, and we had joined the church about the same time. And I seen her the first day I went to Sunday school.

Q. And how did you meet your future wife?

A. We were both real shy. It was kind of difficult, and we met at the Christmas party -- or we actually started talking to each other at a Christmas party that year.

Q. When Kim entered your life, did someone else also enter

your life?

A. Yes. She had a son named Corey.

Q. How old was Corey?

A. At the time, he was 8.

Q. And did Corey have a dad that he knew?

Lyle Cousins - Direct

A. No.

Q. Kim had been raising him on her own?

A. Right.

Q. How did you get to know Kim?

A. Just through church activities and mainly working with her son in a church missions program on Wednesday nights. And I used to have a lot of trouble with her son, so I would talk to her after church to try to get her son straightened out.

Q. And you told us that you were both shy people; but after you had worked with her son for a while, did you eventually ask Kim out?

A. Yeah, I asked her out, and she turned me down.

Q. Did you eventually win her over?

A. Yeah, because she had a boyfriend; but she said if she ever got rid of him, she'd let me know.

Q. How long did it take till she let you know?

A. That was on Wednesday night, and then she called me Friday and asked me to come to one of her son's soccer games.

Q. Mr. Cousins, when did you marry Kim?

A. On June 25, 1994.

Q. Now, in the time that you had been dating her, had you gotten to know her son, Corey?

A. Yes.

Q. What did he call you during that time?

A. He just called me "Lyle."

Lyle Cousins - Direct

Q. Once you got married, did he decide to call you something else?

A. Yeah. He called -- he tugged on my tux at the wedding day and he said -- he looked up and said, "Now I can call you Dad."

Q. After you married Kim, did you and she talk about having children of your own?

A. Yes, we did.

Q. What did you decide?

A. It was -- within just a few months before the bombing, we started discussing having another child; and her sisters and my sisters all have boys, and we really wanted to have a little girl and were talking about having a child then.

Q. Did you have different ideas about when you'd go about doing that?

A. Yeah. I wanted to start right away. I would -- when I would see her take her birth control pill, I would try and talk her out of taking it; and she would always come back with a comment that she had plenty of time because a friend of hers that she worked with, Linda Florence, was 40 when she had her first child, so she said she had plenty of time.

Q. Let me ask you some questions now about April of 1995. How did you and your wife spend the weekend before the bombing?

A. We had taken a church youth group out to a small town in western Oklahoma on a fishing trip. It was a small church camp. They had some nice little ponds, and we took probably

Lyle Cousins - Direct

about 20 of the boys in the youth group, mostly junior high and high school boys.

Q. And you had all gone fishing together?

A. Yes.

Q. Were the fishing poles that you and your wife used still in the truck after you got back?

A. Yeah. We left them in the back of my Blazer.

Q. Let me ask you about the 19th of April. How did your morning start that day?

A. I got up at 6:00. That was my normal time to get up. I had to be to work at 7, and I got myself ready. And I wasn't feeling very well. I had a little sinus problem and some chest congestion, and -- but I was going to go ahead and go to work anyway.

Sometime while I was in the bathroom getting ready, Corey had got out of the bed and got in bed with Kim. And I -- about 6:25, I walked in and -- in the bedroom and I kissed her, told her I loved her; and she just said "Yeah, yeah, yeah."

And as I walked back out in the living room, the phone

rang; and it was work saying it was a slow day and that I didn't need to come in if I wanted to stay home. And I said I did. Being that I was feeling bad, I went and took a shot of NyQuil and went back, got back in bed with Kim and Corey.

Q. Did Kim get up a little later?

A. Yeah. I think around a little after 7, she got up and

Lyle Cousins - Direct

began to get ready and get Corey ready for school. And I'm not exactly real positive what time she left, because by that time the NyQuil was starting to work and I was kind of in a groggy kind of stage, but I was just aware of her in the room and getting ready.

Q. Did you have a conversation before she left the house?

A. Yeah. She told me before she left -- she said she wasn't coming home tonight; that she'd see me in church, to just meet her there because we went to church every Wednesday night.

She --

Q. Go ahead.

A. She just told me she wouldn't come home -- she wasn't coming home; and she reached down and she kissed me and told me she loved me.

And I just said, "Yeah, yeah, yeah," like she did to me.

Q. Later that morning, did you receive a call?

A. Yeah. A little after 10, our church secretary called and asked me if I had been watching TV.

Q. Had you been?

A. No. I was sleeping.

Q. So what did you do?

A. I turned the TV on while I was still on the phone with her, and I just -- I couldn't register what I was seeing because she had already told me that there had been a bombing downtown and

Lyle Cousins - Direct

that it was the building where Kim worked. And when I looked at the building, I realized it was the building, but I didn't think it was as bad as it was, except I seen the first news picture was a picture of the back of my Blazer with the fishing poles sticking out, and I could tell the window was blown out of it and it looked like it was on fire.

Q. As the day went on, did you get more news about whether your wife had gone to work that day?

A. Yes, I did.

Q. How did you learn about that?

A. I knew by the timing and everything that she had to be there, and I talked to some other employees that made it out and that said that they thought she was there but that nobody would say for sure or not whether they seen her inside or outside the building afterwards and kind of kept up hope all day long till that evening, one of her co-workers, Rita Cruz -- she had been missing for quite some time, and sometime during that afternoon they had found her and got her home. And her and her husband came to my house; and she told me just shortly before 9, like 8:55, that she had seen Kim at her desk.

Q. That was April 19?

A. Right.

Q. How long did it take before you knew for sure that your

wife had been found and identified?

A. It was 10 days. It was the following Friday.

Lyle Cousins - Direct

Q. Tell the jury what those 10 days were like for you and your son, Corey.

A. It was really excruciating. I told a lot of people it was sometimes -- some of the most hurting times of my life, and it was also some of the most spiritual times of my life because of my church family spending so much time with me and my best friends just hanging with me the whole time.

And it was just really difficult for me and especially Kim's mom.

Q. Did you have a conversation with Kim's mom during those 10 days about what would happen with Corey?

A. Yeah. It was the second night of the bombing, Thursday night. We were resigned to the fact that Kim was never coming home again and that she was in heaven, and I just -- there was -- the apartment was just full of people, and her and I were in our own little world sitting on the sofa. And I looked at her and said, "What happens to Corey now?"

And she said, "Well, he's your son"; and that was all she said to me.

Q. And has he been your son ever since?

A. Yes.

Q. After 10 days, did it fall to you to tell Corey that his mother had died?

A. Yes, I did. I told him after he got home from school on that Friday. I guess that was one of the most difficult things

Lyle Cousins - Direct

I ever done in my life. That was just right near the top.

Q. How has Corey dealt with the death of his mother?

A. He's actually -- recently, he's dealt really well with it. At first he was just like me. He would have a bad day and a good day and break down a lot. It seemed like the days that I was having struggling would be the days that he would comfort me; and when he was struggling, I would comfort him.

Q. Mr. Cousins, I'd like you first to take a look at your screen.

MR. ORENSTEIN: If I could show Mr. Cousins and offer into evidence Exhibit 2208.

MR. TIGAR: No objection, your Honor.

THE COURT: Received, may be shown.

BY MR. ORENSTEIN:

Q. Mr. Cousins, would you tell the jury who that is.

A. That's my wife, Kim Cousins.

Q. Will you tell the jury who Kim Cousins was.

A. She just was -- you know, after the bombing, me and her dad sit around and we was describing to ourselves and what she meant to us; and he just -- he summed it up for me. She was

just class, I mean just a classy woman. She just -- she was the most beautiful person I've ever known. And I used to -- I just couldn't believe that a big, dorky guy like me ended up with somebody like that.

Q. I'd like to ask you, Mr. Cousins, about the effect your

Lyle Cousins - Direct

wife's death has had on you after 10 months of being married to her and two-and-a-half years later.

A. It's tough being the mom and the dad all of a sudden when you hadn't even been a dad for very long to start with. And my biggest struggles have just been with Corey and trying to do the things his mom did for him and like being part of the PTA at school and trying to make his life as normal as possible and keep him busy. And it's meant a lot of sacrifices as far as I'm concerned for me, because he's like the most important thing in my life.

Q. You told us that you're a truck driver.

A. Uh-huh.

Q. Are there times when you drive a truck that you think about your wife?

A. Yeah.

Q. What do you say when you're driving a truck home thinking about her?

A. Yeah. There was many a times driving home at night I would just thank God -- I know this is a joke -- "Just let her be home when I get there."

Q. I'd like you to think about a time about a year after you got married. Did there come a time when you decided to take off your wedding ring?

A. Yeah. It was June of '95. We were married on June 25, and it just happened that on June 25 of '95 that I was taking Corey

Lyle Cousins - Direct

down to see his grandparents. And we went to -- we met in Ardmore, Oklahoma, which is about halfway between Oklahoma City and Dallas. And none of us, me or her parents -- had really even dawned on us that that was our anniversary. And then we talked about it. I don't know; God worked it out that way. But it ended up that we could kind of have a time together on that day that we didn't even realize it would be as difficult as it was. We stayed and ate together; and when we left, I went home and I spent my anniversary at the cemetery.

Q. Did you take off your ring and put it with hers which had been recovered?

MR. TIGAR: Objection, your Honor.

THE COURT: Sustained.

MR. ORENSTEIN: That's all I have. Thank you, your Honor.

THE COURT: You may step down. You're excused.

MR. TIGAR: No questions.

THE COURT: Members of the jury, we'll take a recess here at this point. And, of course, it's my duty to remind you



HERE at this point. And, of course, it is my duty to remind you that you are going to hear more than what you've heard and also to remind you of some of the things that I said to you when we started yesterday morning with respect to the sentencing hearing and then the factors that have to be considered in making a decision and the process that is involved in the decision.

And of course, in these two days, the information that's been provided to you has focused on one area. But there are many other things that you must consider, as I will explain to you in detail when it comes time to turn this over to you for a decision with respect to sentencing.

So please, of course, continue to keep open minds, avoid discussion of the matters under consideration here among yourselves and with all other persons, and be careful about anything that you read, see, and hear, to avoid being influenced by something other than what you see and hear in this room, realizing that the questions to be answered will have to be answered on the basis of what is presented to you in this courtroom.

So you're excused now till 8:45 tomorrow morning.

(Jury out at 5:00 p.m.)

MR. TIGAR: May I approach, your Honor?

THE COURT: Yes.

(At the bench:)

(Bench Conference 147B3 is not herein transcribed by court order. It is transcribed as a separate sealed transcript.)

(In open court:)

THE COURT: We're in recess till 8:30 tomorrow morning.

(Recess at 5:08 p.m.)

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#### INDEX

Item

Page

#### WITNESSES

Eric Thompson

Direct Examination by Mr. Orenstein

Greg Sohn

Direct Examination by Mr. Goelman

Kay Fulton

Direct Examination by Mr. Mackey

Carl Chipman

Direct Examination by Mr. Sengel

Alan Prokop

Direct Examination by Mr. Ryan

Sharon Coyne

Direct Examination by Ms. Wilkinson

William Titsworth

Direct Examination by Mr. Orenstein

Gary Campbell

Direct Examination by Mr. Mackey

Barbara Trent

Direct Examination by Ms. Wilkinson

Michael Reyes

Direct Examination by Mr. Mackey

Lyle Cousins

Direct Examination by Mr. Orenstein

PLAINTIFF'S EXHIBITS

Exhibit	Offered	Received	Refused	Reserved	Withdrawn
1016	15243	15243			
1171A	15328	15328			
1386	15268	15268			
1427					
1436	15310	15310			
1437	15305	15305			
1449	15261	15261			
1457	15246	15246			
1462	15353	15353			
1500	15275	15275			
1534	15288	15288			
2208	15364	15364			
2223	15342	15342			

\* \* \* \* \*

REPORTERS' CERTIFICATE

We certify that the foregoing is a correct transcript from the record of proceedings in the above-entitled matter. Dated at Denver, Colorado, this 30th day of December, 1997.

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Paul Zuckerman

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Bonnie Carpenter

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