

1 EACH MONTH, BUT EVERY VISIT COULD BE \$500.

2 Q ONE HECK OF A CHIROPRACTOR.  
3 WHEN WAS THE LAST TIME YOU SAW THE  
4 CHIROPRACTOR?

5 A I SAW HIM WITH LUCIA -- I CAN'T RECALL 15:52  
6 RIGHT NOW. EITHER BEGINNING OF THIS YEAR OR DECEMBER.

7 Q YOU SAID YOU SAW HIM WITH LUCIA?

8 A UH-HUH.

9 Q DID YOU AND --  
10 MR. FREID: IS THAT "YES"?

11 THE WITNESS: YES. SORRY. 15:52

12 BY MR. KRETZMER:

13 Q DID YOU AND LUCIA GO AND GET A JOINT DEAL  
14 WITH THE CHIROPRACTOR?

15 MR. FREID: PLEASE. 15:52

16 THE WITNESS: WHAT'S THE JOINT DEAL?

17 BY MR. KRETZMER:

18 Q WHY DID THE CHIROPRACTOR SEE LUCIA?

19 A BECAUSE MEL DROPPED HER AND SHE NEEDED TO  
20 BE SEEN BY CHIROPRACTOR. 15:52

21 Q WHEN DID MEL DROP LUCIA?

22 A WHEN SHE WAS VERY YOUNG. IN DECEMBER.

23 Q WHEN IN DECEMBER DID MEL DROP LUCIA?

24 A I CAN'T REMEMBER EXACTLY THE DATE BUT HE  
25 ACCIDENTALLY DROPPED HER. 15:52

1 Q WHERE DID THIS OCCUR THAT HE DROPPED HER?

2 A IN MALIBU HOME.

3 Q WHERE IN THE MALIBU HOME DID IT OCCUR THAT  
4 HE DROPPED LUCIA?

5 A IN THE KITCHEN. 15:52

6 Q DID HE DROP LUCIA ON THE FLOOR?

7 A YES.

8 Q IN THE KITCHEN?

9 A IT'S ADJACENT TO KITCHEN AREA. I GUESS  
10 IT'S LIKE KITCHEN LIVING ROOM AREA WITH A TILE FLOOR. 15:53

11 Q WHO IS THE CHIROPRACTOR THAT YOU TOOK  
12 LUCIA TO SEE?

13 A [REDACTED] MEL'S CHIROPRACTOR.

14 Q SO SOMETIME IN -- EARLY JANUARY, WAS IT,  
15 YOU TOOK LUCIA TO SEE [REDACTED] THE CHIROPRACTOR? 15:53

16 A I GUESS SO. I CAN'T REMEMBER. I THINK  
17 I SAW HIM IN DECEMBER. I CAN'T REMEMBER RIGHT NOW.

18 Q WHAT WAS IT THAT MADE YOU THINK TAKING  
19 LUCIA TO THE CHIROPRACTOR -- THAT IT WAS NECESSARY TO  
20 TAKE LUCIA TO THE CHIROPRACTOR IN EARLY JANUARY? 15:53

21 A SHE ALSO HAD OTHER PROBLEMS LIKE BELLY  
22 BUTTON. SHE HAD A LITTLE HERNIA, AND HE HELPS WITH THAT.  
23 AND SHE HAD -- I FORGOT WHAT IT'S CALLED. THE COLIC AND  
24 THE CHIROPRACTOR AND OSTEOPATH, BOTH OF THEM WERE FOUND  
25 BY MEL AND MEL RECOMMENDED FOR ME TO TAKE HER. 15:54

1 Q WHAT DID THE CHIROPRACTOR DO FOR THE  
2 BELLY BUTTON AND THE COLIC PROBLEMS?

3 A HE ADDRESSES THE BIRTH EXPERIENCE  
4 WHICH EACH CHILD HAS, AND IT IMPACTS OUR SKULL IN  
5 SUCH A WAY THAT SOME OF US CAN SUFFER THE IMPACT AT 15:54  
6 THE HEAD AND YOUR SPINAL CORD DURING NATURAL BIRTHING.  
7 AND APPARENTLY, IT HAS SOMETHING TO DO WITH THE COLIC  
8 AND THE LITTLE BODY, THE WAY IT'S CONGESTED AND THE  
9 WAY IT COMES OUT COMPACT DURING THE LABOR PROCESS. IT  
10 IMPACTS THE LITTLE BODIES IN SUCH A WAY THAT -- I DON'T 15:54  
11 KNOW HOW TO EXPLAIN IT. IT'S BASICALLY ON THE BACK OF  
12 YOUR HEAD AND YOUR SPINAL CORD AND HE WAS RELEASING  
13 PRESSURE. AND ALSO HER HEAD WAS VERY CONEHEAD LIKE AND  
14 HE HELPED WITH THAT.

15 Q LUCIA HAD A CONEHEAD? 15:55

16 A YEAH.

17 Q WHEN MEL -- WHEN YOU SAY THAT MEL  
18 DROPPED LUCIA ON THE FLOOR IN THE KITCHEN LIVING ROOM  
19 TRANSITIONAL AREA --

20 A ADJACENT. 15:55

21 Q -- WERE YOU THERE? DID YOU SEE THIS  
22 HAPPEN?

23 A I'M WITH LUCIA 24/7, AND I WAS  
24 BREASTFEEDING AT THE TIME --

25 MR. FREID: THE QUESTION IS DID YOU SEE IT. 15:55

1 THE WITNESS: NO.

2 BY MR. KRETZMER:

3 Q SO YOU WEREN'T WITH LUCIA 24/7?

4 A HE LET ME SLEEP FOR TEN MINUTES. I DIDN'T  
5 FALL ASLEEP. I HEARD THE CRY. BECAUSE I HAD RESTLESS  
6 NIGHT. 15:55

7 Q SO FOR THE 23 HOURS AND 50 MINUTES YOU  
8 WERE WITH HER, THERE WAS 10 MINUTES WHEN MEL DROPPED HER  
9 ON THE FLOOR AND YOU HEARD THE CRY; IS THAT CORRECT?

10 A CORRECT. 15:56

11 Q OKAY. DID YOU THEN GET UP? WHAT DID YOU  
12 DO?

13 A I RAN DOWNSTAIRS AND HE ALREADY PICKED HER  
14 UP AND TOLD ME THAT HE DID SOMETHING STUPID.

15 Q WHAT ELSE DID HE SAY? 15:56

16 A HE JUST DIDN'T SAY VERY MUCH ELSE. HE  
17 WAS UPSET, AND I TOOK LUCIA, AND I WAS -- I DIDN'T SAY  
18 ANYTHING TO HIM. I ASKED HIM HOW IT HAPPENED, AND WHAT  
19 HAD HAPPENED, AND HOW HE FOUND HER, AND HE EXPLAINED  
20 EVERYTHING TO ME. SHOWED WHERE SHE FELL FROM, AND I  
21 ANALYZED HER AND LOOKED AT HER EYES. 15:56

22 I LOOKED AT HER BRUISES -- NOT BRUISES BUT  
23 THE BUMP ON HER FRONT AND THE BUMP ON HER BACK, BACK OF  
24 THE HEAD AND THE FRONT OF THE HEAD, AND ANALYZED THAT  
25 AND -- BUT SHE LOOKED FOCUSED. AFTER INITIAL SHOCK OF 15:57

1 CRYING AND, OF COURSE, I CONSOLED HER AND SHE STOPPED  
2 CRYING EVENTUALLY.

3 HER EYES WERE FOCUSED AND SHE DIDN'T  
4 APPEAR TO BE IN MUCH PAIN AFTER THAT, AND WE CALLED --  
5 I CAN'T REMEMBER WHICH DOCTOR WE CALLED. I THINK I 15:57  
6 CALLED [REDACTED], [REDACTED] AND WE HAD A -- WE  
7 ALSO -- I HAD AN APPOINTMENT WITH DOCTOR -- THE OSTEOPATH  
8 FOLLOWING MORNING. AND SINCE LUCIA DIDN'T SHOW SIGNS OF  
9 SERIOUS INJURY POST THE FALL AND HER EYES WERE FOCUSED  
10 AND SHE BEGAN TO BE NORMAL, SHE APPEARED TO BE NORMAL, 15:57  
11 THERE WAS NO NEED TO TAKE HER TO AN EMERGENCY ROOM.

12 Q WHAT WAS THE OSTEOPATH'S NAME?

13 A [REDACTED]

14 Q [REDACTED]

15 A [REDACTED] 15:58

16 Q DO YOU KNOW HOW TO SPELL THAT?

17 A [REDACTED] SOMETHING LIKE THAT.

18 Q WHERE IS [REDACTED] LOCATED IN?

19 A SANTA MONICA.

20 Q WAS THIS ANOTHER ONE OF MEL'S DOCTORS? 15:58

21 A HE'S THE ONE THAT FOUND HIM, YES.

22 Q I'M SORRY?

23 A HE'S THE ONE THAT FOUND THAT DOCTOR.

24 Q MEL FOUND THAT DOCTOR?

25 A YES. 15:58

1 Q NOW, LUCIA HAD A BUMP ON THE FRONT OF HER  
2 HEAD?

3 A AND ON THE BACK.

4 Q DID MEL DROP HER TWICE?

5 A NO. THE WAY SHE FELL DOWN --

15:58

6 MR. FREID: JUST ANSWER THE QUESTION, PLEASE.

7 THE WITNESS: NO.

8 BY MR. KRETZMER:

9 Q HE DROPPED HER ONLY ONCE?

10 A YES.

15:58

11 Q HOW DID SHE GET A BUMP ON THE BACK OF THE  
12 HEAD AND ON THE FRONT OF THE HEAD THEN?

13 MR. FREID: I'M GOING TO OBJECT ON THE GROUNDS OF  
14 SPECULATION AND FOUNDATION. SHE SAID SHE WASN'T THERE.  
15 SO HOW WOULD SHE KNOW.

15:59

16 MR. KRETZMER: PERHAPS SOMEBODY TOLD HER.

17 Q HOW DO YOU KNOW HOW SHE GOT A BUMP ON  
18 THE FRONT OF THE HEAD AND THE BACK OF THE HEAD?

19 A HE TOLD ME THAT HE PROPPED A VERY  
20 LARGE CUSHION, LIKE A PROP-UP CUSHION -- IT'S A LARGE  
21 CUSHION -- AND ON TOP OF THAT CUSHION -- AND IT SORT  
22 OF TILTS THAT WAY. IT'S LIKE BIG. AND HE ON TOP OF THAT  
23 PUT A MAT FOR THE CHANGING TABLE AND HE PUT LUCIA ON TOP  
24 OF THAT MAT. SO LITERALLY SHE WAS SITTING ON A SLIDE ON  
25 TOP OF THE TABLE. AND I THINK HE WENT TO HAVE A SMOKE

15:59

15:59

1 AND SHE SLID DOWN. AND FALLING DOWN SHE HIT THE BACK OF  
2 HER HEAD HERE -- THAT'S WHAT WE BOTH SORT OF ESTIMATED --  
3 AND THEN WHEN SHE FELL DOWN, SHE FELL ON THE FACE.

4 MR. KOLODNY: DURING THE COURSE OF THAT  
5 ANSWER, THE WITNESS HELD BOTH ARMS UP IN APPROXIMATELY 16:00  
6 A 45-DEGREE ANGLE TO HER BODY.

7 MR. FREID: WHATEVER THAT MEANS.

8 THE WITNESS: I DON'T UNDERSTAND THE WORDS HE  
9 SAID.

10 BY MR. KRETZMER: 16:00

11 Q NOW, WAS IT YOU YOURSELF OR YOU AND MEL  
12 WHO RECONSTRUCTED THE ACCIDENT HERE?

13 A THERE WAS NO RECONSTRUCTION. HE JUST  
14 EXPLAINED IT TO ME.

15 Q AND YOU THINK HE WENT TO HAVE A SMOKE? 16:00

16 A I THOUGHT HE DID. I'M NOT SURE.

17 Q WHY DO YOU THINK THAT?

18 A BECAUSE HE SAID HE LEFT HER JUST FOR A  
19 MINUTE.

20 Q AND WHAT TIME OF DAY APPROXIMATELY, WHAT 16:00  
21 TIME, DID THIS OCCUR?

22 A AROUND 8:00 A.M.

23 Q DID LUCIA CRY?

24 A OF COURSE.

25 Q DID LUCIA THEN STOP CRYING SHORTLY 16:00

1 THEREAFTER?

2           A           SHE STOPPED CRYING MAYBE 15, 20 MINUTES  
3 LATER AFTER BEING CONSOLED. I WAS CARRYING HER AND YOU  
4 KNOW --

5           MR. FREID: WE NEED TO TAKE A FIVE-MINUTE  
6 BREAK.

7           MR. KRETZMER: OKAY.

8           THE VIDEOGRAPHER: WE'RE GOING OFF THE RECORD AT  
9 4:01 P.M.

10                           (RECESS TAKEN.)

16:01

16:08