



Transcript of the Testimony of **Rochelle Ritzi**

**Date:** June 2, 2020

**Case:** In the Interest of L.L.C. Minor Child

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1 CAUSE NO. DF-13-06713  
 2 IN THE INTEREST OF ) IN THE DISTRICT COURT  
 )  
 3 )  
 4 L.L.C. IV ) DALLAS COUNTY, TEXAS  
 )  
 5 A CHILD ) 256TH JUDICIAL DISTRICT

6  
7

8 \* \* \* \* \*

9 ORAL VIDEOTAPED DEPOSITION

10 ROCHELLE RITZI

11 JUNE 2, 2020

12 (REPORTED REMOTELY)

13 \* \* \* \* \*

14

15 ORAL DEPOSITION OF ROCHELLE RITZI, produced as a  
 16 witness at the instance of the Petitioner and duly  
 17 sworn, was taken in the above-styled and numbered cause  
 18 on June 2, 2020, from 1:31 p.m. to 4:47 p.m., before  
 19 Christy Fagan, CSR, CRR, RMR, TMR, RPR, CLR in and for  
 20 the State of Texas, reported remotely by computerized  
 21 stenotype machine, considered being taken at the  
 22 witness's location of Laurel Arnold Clement, PC,  
 23 555 Republic Drive, Suite 200, Plano, Texas, during the  
 24 COVID-19 State of Disaster, pursuant to the Texas Rules  
 25 of Civil Procedure.

2

1 APPEARANCES  
 2 FOR THE PETITIONER (VIA VIDEOCONFERENCE):  
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 19 FOR THE WITNESS (VIA VIDEOCONFERENCE):  
 20 Laurel Arnold Clement, PC  
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 22 Suite 200  
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 25 lclementlaw@gmail.com  
 ALSO PRESENT:  
 Ms. Andrea Ferrell (via videoconference)  
 Mr. Stephen Howard (via videoconference)  
 Mr. Rick Bell, Videographer (via  
 conference)

4

1 PROCEEDINGS  
 2 (Exhibits premarked before the deposition  
 3 by Petitioner's counsel.)  
 4 VIDEOGRAPHER: We're on the record at  
 5 1:31 a.m. [sic]. Today's June the 2nd, 2020. This is  
 6 the oral and video-recorded deposition of Rochelle  
 7 Ritzi. This -- participants should be aware that this  
 8 proceeding is being recorded and, as such, all  
 9 conversations held will be recorded unless there is a  
 10 request and agreement to go off the record. Private  
 11 conversations and/or attorney-client interaction should  
 12 be held outside the presence of the remote interface.  
 13 Would counsel please state their  
 14 appearance for the record.  
 15 MS. MCKNIGHT: Mary McKnight for  
 16 Lauriston Crockett, III.  
 17 MS. HAYES: Kris Hayes representing the  
 18 Petitioner, Nikki Ngo.  
 19 VIDEOGRAPHER: You're on mute, Lauren --  
 20 Laurel.  
 21 MR. CROCKETT: This is Lauriston  
 22 Crockett. I'm letting my attorney speak for me.  
 23 VIDEOGRAPHER: Oh, yeah, that's good.  
 24 MS. CLEMENT: Laurel Clement, attorney  
 25 for the witness, Rochelle Ritzi.

3

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5

1 VIDEOGRAPHER: Thank you. Would the  
 2 court reporter please take over.  
 3 ROCHELLE RITZI,  
 4 having been first duly sworn, testified as follows:  
 5 EXAMINATION  
 6 BY MS. MCKNIGHT:  
 7 Q All right, ma'am, would you state your full  
 8 name for the Court and jury, please.  
 9 A Rochelle Marie Ritzi.  
 10 Q And you are a licensed professional counselor?  
 11 A Yes, ma'am.  
 12 Q And were you appointed by the Court in this  
 13 case to counsel with the child who is the subject of  
 14 this suit?  
 15 A Yes, I was -- I believe I was named in the --  
 16 in the documents to see him before I had ever met -- met  
 17 anybody.  
 18 Q All right. Now, what -- do you have a written  
 19 order appointing you that spells out the parameters of  
 20 your appointment?  
 21 A I have -- I mean, I'm not sure of the  
 22 question, I guess.  
 23 Q What were you appointed to do, exactly?  
 24 A To be the child's counselor.  
 25 Q Well, were you doing play therapy, were you

|   |  |   |   |
|---|--|---|---|
| 6 | <p>1 doing psychotherapy? Exactly what were you asked by the<br/>2 Court to do?<br/>3 A To be the therapist.<br/>4 Q The therapist. For whom?<br/>5 A For the child.<br/>6 Q Lauriston Crockett, III -- IV; is that<br/>7 correct?<br/>8 A That's correct.<br/>9 Q Now, do you have a copy of the order<br/>10 appointing you?<br/>11 A I don't -- I don't know. It would be in my<br/>12 records if I did.<br/>13 Q Do you recall exactly what the order directs<br/>14 you to do in the course of this counseling that you're<br/>15 performing for Lauriston Crockett, IV?<br/>16 A What I recall is that it's requested that I be<br/>17 his therapist.<br/>18 Q All right. Was there any particular -- were<br/>19 you doing play therapy, what -- what sort of therapy<br/>20 were you doing with this -- at that time he was, like, a<br/>21 seven- or eight-year-old child?<br/>22 MS. HAYES: Objection to --<br/>23 Q How old was he when you began seeing him?<br/>24 A He was seven.<br/>25 THE REPORTER: Hold on. Hold on. I</p> | 8 | <p>1 IV, how did you come to be -- who recommended you for<br/>2 that case?<br/>3 A At different times the father reached out to<br/>4 me, and another time the mother reached out to me and<br/>5 asked me to take the case on.<br/>6 Q Were you not recommended by Dr. -- by Vickie<br/>7 Alexander?<br/>8 A I came to understand later that I was -- that<br/>9 she recommended me.<br/>10 Q Do you know Vickie Alexander?<br/>11 A I know her through the court.<br/>12 Q Now, you did have both parents initially sign<br/>13 contractual agreements with you, did you not, that<br/>14 spelled out their duties and yours?<br/>15 A Yes.<br/>16 Q Their obligations?<br/>17 A Yes.<br/>18 Q And when you left Therapy on the Square, why<br/>19 did you leave?<br/>20 A To open my own practice.<br/>21 Q All right. And was there any other reason?<br/>22 A I was ready to open my own practice.<br/>23 Q Was there any special time frame for you to do<br/>24 that?<br/>25 A I'm unsure of the -- not -- I mean, I gave my</p>                  |
| 7 | <p>1 didn't get her answer because of the objection. What<br/>2 was the answer to the last question?<br/>3 THE WITNESS: He was seven.<br/>4 Q And at that time where were you employed?<br/>5 A Therapy on the Square.<br/>6 Q And what was your position there?<br/>7 A I was a therapist.<br/>8 Q Okay. And was that practice owned by<br/>9 Dr. Brandy Schumann, Ph.D.?<br/>10 A That's correct.<br/>11 Q Do you need me to repeat?<br/>12 A That's correct.<br/>13 Q Was that practice, Therapy on the Square,<br/>14 owned by Dr. Brandy Schumann, Ph.D.?<br/>15 A Yes.<br/>16 Q All right. And how long -- when did you begin<br/>17 to work for Dr. Schumann?<br/>18 A Summer of 2010.<br/>19 Q Okay. And what was the nature of your<br/>20 affiliation with that group?<br/>21 A I was a therapist.<br/>22 Q Did you have your own clients or did they<br/>23 assign clients to you?<br/>24 A Both.<br/>25 Q All right. And the child, Lauriston Crockett,</p>  | 9 | <p>1 notice saying that I was going to open my own practice,<br/>2 and I could when that time came.<br/>3 Q How long have you had your own practice?<br/>4 A We -- I think we officially started at the<br/>5 very end of November.<br/>6 Q 2019?<br/>7 A Yes.<br/>8 Q And when you would see the child, what -- were<br/>9 you doing play therapy, were you -- you know, what were<br/>10 you doing?<br/>11 A Oh.<br/>12 Q What were you treating him for?<br/>13 MS. CLEMENT: Okay. Which question?<br/>14 Those are very different questions.<br/>15 Q Okay. Let's do one at the time.<br/>16 What were you treating Lauriston<br/>17 Crockett, IV, what was the -- what symptoms or what<br/>18 diagnosis were you treating him for?<br/>19 A Anxiety and just reaction to parental discord,<br/>20 separation.<br/>21 Q I notice depression is mentioned too. Were<br/>22 you treating him for depression as well?<br/>23 A At times he appeared depressed.<br/>24 Q And when is the last time that you have seen<br/>25 Lauriston Crockett, IV?</p> |

|    |  |    |  |
|----|--|----|--|
| 10 | <p>1 A I'm logging on my -- my calendar.</p> <p>2 <b>Q Sure.</b></p> <p>3 MS. CLEMENT: Mary, is your smoke</p> <p>4 detector going off or what is that?</p> <p>5 MS. MCKNIGHT: There's nothing going off</p> <p>6 here.</p> <p>7 MS. CLEMENT: I mean, I keep hearing a</p> <p>8 battery or something.</p> <p>9 MS. MCKNIGHT: Not in this office.</p> <p>10 MS. CLEMENT: Does anybody else hear it?</p> <p>11 MS. MCKNIGHT: I don't.</p> <p>12 MS. CLEMENT: Christy does. Okay.</p> <p>13 A My last session was May 28th.</p> <p>14 <b>Q And who brought him to that session?</b></p> <p>15 A Mother.</p> <p>16 <b>Q And did you interact with her on that date?</b></p> <p>17 A Yes.</p> <p>18 MS. CLEMENT: I'm sorry, can you repeat</p> <p>19 the question?</p> <p>20 <b>Q Did you interact with Nikki Ngo-Cottingham on</b></p> <p>21 <b>that date?</b></p> <p>22 A Yes.</p> <p>23 <b>Q And is there some reason that we do not have</b></p> <p>24 <b>the notes, progress notes or written notes, from that</b></p> <p>25 <b>session?</b></p>   | 12 | <p>1 <b>Q Has he said anything about why he's not seeing</b></p> <p>2 <b>his father?</b></p> <p>3 A He told me that the owner of Hannah's House</p> <p>4 died of a stroke.</p> <p>5 <b>Q And that's all he said?</b></p> <p>6 A Yes.</p> <p>7 <b>Q Now, what -- what is he doing for the summer?</b></p> <p>8 <b>What were the summer plans for Lauriston, IV?</b></p> <p>9 MS. CLEMENT: According to the father or</p> <p>10 according to the --</p> <p>11 MS. MCKNIGHT: Ma'am, if you would,</p> <p>12 objection, form is proper.</p> <p>13 MS. CLEMENT: I'm just trying to help us</p> <p>14 move this along.</p> <p>15 MS. MCKNIGHT: No, please, let's do it by</p> <p>16 the rules.</p> <p>17 MS. CLEMENT: Okay. If I make an</p> <p>18 objection, form, you may or may not understand what I'm</p> <p>19 asking.</p> <p>20 MS. MCKNIGHT: I will understand. I've</p> <p>21 been doing this awhile. Just please do it by the rules.</p> <p>22 MS. CLEMENT: Okay.</p> <p>23 <b>Q Now, Dr. Ritzi, did any -- did the mother or</b></p> <p>24 <b>the child tell you what the plans are for the child this</b></p> <p>25 <b>summer?</b></p>   |
| 11 | <p>1 A It was in the -- the file request that I -- or</p> <p>2 the -- the batch of information that I sent you.</p> <p>3 <b>Q You're breaking up. I'm sorry.</b></p> <p>4 A It was in the documents that I sent you.</p> <p>5 <b>Q I did not find that. May the 28th?</b></p> <p>6 A (Witness nods affirmatively).</p> <p>7 <b>Q And what was the -- what was the -- what were</b></p> <p>8 <b>your findings on that visit?</b></p> <p>9 A I'm unsure of --</p> <p>10 MS. CLEMENT: What do you mean by</p> <p>11 findings?</p> <p>12 MS. MCKNIGHT: Just that.</p> <p>13 <b>Q Did -- well, was the child still anxious?</b></p> <p>14 A He seemed happy. He did -- he did have some</p> <p>15 anxiety.</p> <p>16 <b>Q And what has he been told about -- you're</b></p> <p>17 <b>aware that he has not seen his father now for several</b></p> <p>18 <b>weeks; are you not?</b></p> <p>19 MS. CLEMENT: She doesn't know what he's</p> <p>20 been told. She knows what he tells her.</p> <p>21 MS. MCKNIGHT: I will ask her what she</p> <p>22 told him.</p> <p>23 <b>Q Have you told him why he's not seeing his</b></p> <p>24 <b>father?</b></p> <p>25 A I have not.</p> | 13 | <p>1 A The summer regarding?</p> <p>2 <b>Q Well, what activities are planned for him?</b></p> <p>3 A They haven't told me.</p> <p>4 <b>Q All right. And who has helped him with his</b></p> <p>5 <b>online schooling?</b></p> <p>6 MS. CLEMENT: Objection, form.</p> <p>7 <b>Q Did he say who is helping him with his online</b></p> <p>8 <b>schooling?</b></p> <p>9 A He's reported that his mom has helped him with</p> <p>10 some of his homework.</p> <p>11 <b>Q Now, have you reviewed any of the most recent</b></p> <p>12 <b>Hannah's House records?</b></p> <p>13 A No.</p> <p>14 <b>Q Has the child mentioned to you that staying</b></p> <p>15 <b>home sucks?</b></p> <p>16 A At times.</p> <p>17 <b>Q When did he say that staying home sucked?</b></p> <p>18 A In one of the sessions, I'm imagining.</p> <p>19 <b>Q Anything else he said about staying home?</b></p> <p>20 A At times he mentioned that he enjoyed not</p> <p>21 going to school. At times he mentioned that he missed</p> <p>22 his friends.</p> <p>23 <b>Q And when you saw Nikki Ngo-Cottingham on May</b></p> <p>24 <b>the 28th, when was the last time you had seen her prior</b></p> <p>25 <b>to that?</b></p> |

14

1 A Two weeks prior at the previous session.  
 2 **Q Did she come with Mr. Cottingham or alone?**  
 3 A I only saw Nikki.  
 4 **Q Has she advised you that she was not leaving**  
 5 **the apartment all summer?**  
 6 THE WITNESS: I had no idea that that was  
 7 in the [inaudible]. Just one --  
 8 MS. MCKNIGHT: Excuse me --  
 9 MS. CLEMENT: Absolutely what you should  
 10 say is that --  
 11 MS. MCKNIGHT: -- I am going to object to  
 12 the attorney-client conference, and it's right on the  
 13 record.  
 14 **Q Ma'am, I'll ask you differently.**  
 15 **Are you aware of whether or not Nikki**  
 16 **Ngo-Cottingham has been confined to the apartment so far**  
 17 **this summer and spring?**  
 18 A I don't know.  
 19 **Q Did the child say anything about his mother**  
 20 **not leaving the apartment?**  
 21 A No.  
 22 **Q What does he tell you that he does with his**  
 23 **day? What does the child say he does during a regular**  
 24 **day?**  
 25 A He doesn't say what he does. He doesn't talk

15

1 about that often.  
 2 **Q What does he talk about on -- go back to the**  
 3 **May 28th session.**  
 4 MS. MCKNIGHT: And, Andrea, would you run  
 5 up and see if Steve can find the May 28th session? I  
 6 don't have it.  
 7 MS. FERRELL: Absolutely.  
 8 MS. MCKNIGHT: Okay.  
 9 **Q What did he talk about on May 28th?**  
 10 A He said -- I'm quoting my note. "Client  
 11 stated Vickie asked me if I wanted to meet my dad in the  
 12 park and go eat, but I don't want to. Client then  
 13 further stated my dad scares me."  
 14 **Q He said that on May the 28th?**  
 15 A Yes.  
 16 **Q Did he say how his dad scares him?**  
 17 A No.  
 18 **Q Now, Dr. Ritzi, has he ever expressed to**  
 19 **you -- in all the time you've been seeing him, has this**  
 20 **child ever said his dad was physically abusive or**  
 21 **violent with him in any way?**  
 22 A No.  
 23 **Q And has he ever told you why he would be**  
 24 **afraid of his dad?**  
 25 A No.

16

1 **Q Now, when you saw him on May the 28th, he had**  
 2 **been in the sole care of Nikki Ngo-Cottingham and Rob**  
 3 **Cottingham for several weeks without any intervention**  
 4 **from his dad; isn't that true?**  
 5 A I don't know.  
 6 **Q Well, do you know of any access that his dad**  
 7 **has had since Hannah's House closed?**  
 8 A I don't know.  
 9 **Q And you're telling the Court and jury today**  
 10 **that this child said he is afraid of his dad and didn't**  
 11 **want to go eat in the park with him?**  
 12 A That is what he said.  
 13 **Q Now, Dr. Ritzi, you have also stated that you**  
 14 **are afraid of Mr. Lauriston Crockett, III, haven't you?**  
 15 A When I was asked that in court.  
 16 **Q You've stated it on several occasions; have**  
 17 **you not?**  
 18 A I don't recall when.  
 19 **Q Well, when Stephen, our paralegal, was trying**  
 20 **to make arrangements to get your records, did you state**  
 21 **in writing then that you did not want to meet**  
 22 **Mr. Crockett to deliver the records, that you were**  
 23 **afraid of him?**  
 24 A I don't know if I used the word afraid. I'd  
 25 have to look at --

17

1 **Q You declined to meet Mr. Crockett, didn't you?**  
 2 A Yes.  
 3 **Q When did you become fearful of Mr. Crockett?**  
 4 A I don't know if the word fearful is accurate.  
 5 When -- when -- the times in which in -- when I was in  
 6 McKinney, the office in McKinney, that he would get  
 7 frustrated with me.  
 8 **Q All right. And what did he do when he got**  
 9 **frustrated with you, Dr. Ritzi?**  
 10 A His voice. His tone of voice.  
 11 **Q Did he threaten you in any way to harm you?**  
 12 A No.  
 13 **Q Did he ever become physically aggressive in**  
 14 **any way with you?**  
 15 A No.  
 16 **Q And do you -- can you produce for this Court**  
 17 **or jury any document or paper that states anything**  
 18 **threatening or that you base your fear on?**  
 19 A Just my interactions of feeling just  
 20 uncomfortable.  
 21 **Q Feeling uncomfortable. Now, you're a**  
 22 **psychologist; is that correct? Or you're a licensed**  
 23 **professional counselor. Does uncomfortable equate to**  
 24 **fear?**  
 25 A At times.

|    |   |    |   |
|----|---|----|---|
| 18 | <p>1 MS. HAYES: Objection to form.</p> <p>2 <b>Q I'm asking a question. You can answer. Does</b></p> <p>3 <b>uncomfortable in your vernacular equate to fear?</b></p> <p>4 A It can.</p> <p>5 <b>Q Well, did it in your case?</b></p> <p>6 <b>Excuse me just a moment.</b></p> <p>7 <b>Stephen, do you have the records from the</b></p> <p>8 <b>28th?</b></p> <p>9 MR. HOWARD: There's a file that's dated</p> <p>10 5/28, but the record says it was created on 5/30 and the</p> <p>11 document references a different date.</p> <p>12 MS. MCKNIGHT: Okay.</p> <p>13 <b>Q Dr. Ritzi, Stephen Howard, my paralegal, has</b></p> <p>14 <b>just handed me a document that is dated 5/28. There are</b></p> <p>15 <b>no chart notes here except to say "Mr. Crockett is</b></p> <p>16 <b>contacting you this afternoon regarding your retainer.</b></p> <p>17 <b>He will pay you directly by credit card." That's -- and</b></p> <p>18 <b>then there is another one here that says -- it's simply</b></p> <p>19 <b>about the email, but there is no --</b></p> <p>20 MS. MCKNIGHT: Is there any clinical</p> <p>21 notes from Ms. Ritzi for May the 28th?</p> <p>22 MR. HOWARD: If she has one, if she can</p> <p>23 [inaudible] point us to the file name, I'll print it</p> <p>24 out.</p> <p>25 <b>Q Can you point us to the file name, Dr. Ritzi,</b></p> | 20 | <p>1 distortion] complete or is that in the shared DB?</p> <p>2 MS. CLEMENT: Yeah, who's asking that? I</p> <p>3 can't tell.</p> <p>4 MS. MCKNIGHT: Steve Howard is asking her</p> <p>5 to direct him to where the file is that he's trying to</p> <p>6 retrieve that --</p> <p>7 MS. CLEMENT: Oh, okay.</p> <p>8 MS. MCKNIGHT: -- that she sent us.</p> <p>9 MS. CLEMENT: Okay.</p> <p>10 THE WITNESS: That is in the -- the one</p> <p>11 that I sent you where it took you straight into Dropbox.</p> <p>12 Not the one that said shared DB, the other one.</p> <p>13 MR. HOWARD: All right.</p> <p>14 THE WITNESS: The most recent one.</p> <p>15 MS. CLEMENT: It is in the most recent</p> <p>16 one?</p> <p>17 THE WITNESS: Uh-huh.</p> <p>18 MR. HOWARD: It is in the most recent one</p> <p>19 from 9:00 last night?</p> <p>20 THE WITNESS: Yes. From what it looks</p> <p>21 like on my side, that's -- when I open that up, that's</p> <p>22 what I see.</p> <p>23 MR. HOWARD: I'm going to check.</p> <p>24 MS. MCKNIGHT: Okay. Go ahead. We'll</p> <p>25 get back to it.</p>  |
| 19 | <p>1 <b>and Steve will print it?</b></p> <p>2 A I don't choose the file name of the program</p> <p>3 itself. I'd have to look to see --</p> <p>4 <b>Q Well, if you would, do that, because we would</b></p> <p>5 <b>like to see the file -- the notes where this child said</b></p> <p>6 <b>to you that he did not want to see his daddy, that he's</b></p> <p>7 <b>afraid of him and did not want to eat in the park with</b></p> <p>8 <b>him.</b></p> <p>9 MS. CLEMENT: Oh. You need to log on.</p> <p>10 THE WITNESS: Oh. I think I need to go</p> <p>11 into Dropbox.</p> <p>12 MS. MCKNIGHT: We'll wait.</p> <p>13 THE WITNESS: Let's see what I sent.</p> <p>14 MS. CLEMENT: Okay.</p> <p>15 A Okay. It looks like it is going to say</p> <p>16 Progress Note 05-29-2020.</p> <p>17 MR. HOWARD: 05-29?</p> <p>18 THE WITNESS: It's Progress Note</p> <p>19 05-29-2020.</p> <p>20 MR. HOWARD: Is that part of the -- are</p> <p>21 you looking in the -- what you exported to us or are you</p> <p>22 looking in your database?</p> <p>23 THE WITNESS: I'm looking at what I</p> <p>24 exported to you.</p> <p>25 MR. HOWARD: Okay. Is that in the [audio</p>  | 21 | <p>1 <b>Q Now, Dr. Ritzi, would you pull up Deposition</b></p> <p>2 <b>Exhibit 1? Do you have it?</b></p> <p>3 A It's loading.</p> <p>4 <b>Q Okay.</b></p> <p>5 A Okay. I have it.</p> <p>6 <b>Q All right. Now, did you see Lauriston</b></p> <p>7 <b>Crockett, IV at 5:30 p.m. on April the 23rd?</b></p> <p>8 <b>I'm sorry, I can't see you. Your</b></p> <p>9 <b>attorney's head is totally blocking.</b></p> <p>10 A The email -- the email notates something,</p> <p>11 but I can't say from the email if that's . . .</p> <p>12 <b>Q And who called and -- your -- who -- who made</b></p> <p>13 <b>that appointment?</b></p> <p>14 A The mother.</p> <p>15 <b>Q And when did she call and make that</b></p> <p>16 <b>appointment?</b></p> <p>17 A I don't -- I mean, I looked -- according to</p> <p>18 this email, it doesn't show that there was a time that</p> <p>19 she had called and made the appointment.</p> <p>20 <b>Q Looking at Deposition Exhibit 1, Mr. Whiddon</b></p> <p>21 <b>is writing to Nikki. He says "Sorry for the delayed</b></p> <p>22 <b>response. The situation is very concerning considering</b></p> <p>23 <b>LC is saying that Logan did not actually fall off the</b></p> <p>24 <b>bike. When is the next session with Rochelle? You may</b></p> <p>25 <b>want to have Logan talk to Rochelle or Vickie and maybe</b></p> |

22

1 they can extract/massage the information -- out the  
 2 information. I do not advise that we seek emergency  
 3 relief until we get immed- -- additional information."  
 4 Now, what was that in relation to,  
 5 Dr. Ritzi?  
 6 MS. HAYES: I'm going to object to form.  
 7 Q Why were you seeing the child on that date?  
 8 What information were you seeking to massage or extract  
 9 from the child on May -- on April 23rd, 2019?  
 10 A If I remember correctly, that is from -- there  
 11 was concern regarding a bruise on Logan's arm.  
 12 Q And when you saw that child on April the 23rd,  
 13 2019, were you aware that he had been questioned the  
 14 night before by two police department officials and a  
 15 medical facility?  
 16 A That's what I was told.  
 17 Q Until 11:00 o'clock the night before. You  
 18 were aware of that, weren't you?  
 19 MS. HAYES: Objection to form.  
 20 Q Were you aware, Dr. Ritzi? You can answer yes  
 21 or no.  
 22 A No.  
 23 Q Did you learn that he had been questioned  
 24 until 11:00 o'clock the night before?  
 25 A Somebody mentioned it. I don't recall who it

23

1 was. It was in some --  
 2 Q Now -- and you did know before you started  
 3 questioning him that this had taken place, didn't you?  
 4 MS. CLEMENT: Objection, form.  
 5 Q Where did you get the allegations, who made  
 6 the allegations that he had been abused?  
 7 MS. CLEMENT: Objection, form.  
 8 Q You were questioning him about possible abuse,  
 9 were you not, Dr. Ritzi?  
 10 A I was -- I asked him -- can I -- I'm going to  
 11 -- can I read my note?  
 12 Q Just tell me what you were questioning him  
 13 for.  
 14 A I need to -- I need to read my note to recall  
 15 because it's been a -- been a little while.  
 16 Q Is that the note that became corrupted and you  
 17 couldn't find it when you responded to discovery?  
 18 A This is -- yes. This is the one that didn't  
 19 download properly.  
 20 I asked him if he knew why he had a  
 21 session.  
 22 Q Well, you knew why he had a session, didn't  
 23 you?  
 24 A Yes.  
 25 Q And you knew that he had been questioned the

24

1 night before, didn't you?  
 2 A Yes.  
 3 Q Now, when you were -- when -- you did read  
 4 Mr. Whiddon's suggestion to Nikki that either you or  
 5 Vickie Alexander might extract or -- extract or massage  
 6 the information from this eight-year-old child. He was  
 7 eight at the time. How did you respond to that?  
 8 A I don't know I did respond to that.  
 9 Q You just made the appointment and questioned  
 10 the child, didn't you?  
 11 A I asked the child if --  
 12 Q Did you make the appointment and question the  
 13 child; yes or no?  
 14 MS. HAYES: Objection, form.  
 15 MS. CLEMENT: Objection.  
 16 MS. MCKNIGHT: What is your objection?  
 17 MS. HAYES: You --  
 18 MS. CLEMENT: Let the witness answer the  
 19 question.  
 20 Q Could you answer the question, Dr. Ritzi?  
 21 That would be gratifying.  
 22 A Could you repeat the question?  
 23 Q Yes. Did you make the appointment as  
 24 Mr. Whiddon suggested? Did you --  
 25 A Yes.

25

1 Q -- at 5:30 that same day?  
 2 A I made the appointment because the mother  
 3 requested it.  
 4 Q Did you make it -- you read Mr. Whiddon's --  
 5 you were copied on Mr. Whiddon's email, weren't you?  
 6 You and Vickie Alexander were both copied.  
 7 A Yes.  
 8 Q And did you respond to those lawyers and  
 9 say -- and to Nikki and say "My job is not to  
 10 extract/massage information out of an eight year old"?  
 11 A I don't -- the only email I'm looking at is  
 12 the email that -- that I didn't --  
 13 Q Did you -- did you respond and tell them that  
 14 "It is" -- as you told Mr. Crockett in the past, "It is  
 15 not my job to build a case for you"?  
 16 A I don't know if I responded in an email as  
 17 such.  
 18 MS. CLEMENT: She has to have a release  
 19 of information to talk with --  
 20 MS. MCKNIGHT: Objection. Ma'am, would  
 21 you just play by the rules here and we'll get along a  
 22 lot faster?  
 23 MS. CLEMENT: Okay. Allow her to answer  
 24 reasonable questions, please.  
 25 MS. MCKNIGHT: And, if you would, back



26

1 off from the -- so I can see your client. I'm  
 2 questioning her.  
 3 MS. CLEMENT: Okay. You can see both of  
 4 us.  
 5 **Q Now, Dr. Ritzi --**  
 6 MS. CLEMENT: I'm looking at --  
 7 **Q -- did you --**  
 8 MS. CLEMENT: -- the screen right now.  
 9 **Q -- did you have a conversation -- regarding**  
 10 **this massaging and extracting information, did you have**  
 11 **a conversation with either Mr. Whiddon, Ms. Hayes, or**  
 12 **Vickie Alexander?**  
 13 A No.  
 14 **Q And why were you talking to this child again,**  
 15 **knowing he had been questioned the night before?**  
 16 A They asked for a session.  
 17 **Q And you knew -- you had read the email and**  
 18 **you knew what it was for, didn't you?**  
 19 A I don't remember when I read that email.  
 20 **Q Well, you were -- you were -- the email was**  
 21 **sent at 11:44 a.m. and you saw this child at 5:30, which**  
 22 **was after your usual hours, wasn't it?**  
 23 A That's not correct. My usual hours vary.  
 24 **Q But you got him right in to question him.**  
 25 **Did you have any reason, Dr. Ritzi, to**

27

1 **believe that Lauriston Crockett, III had physically**  
 2 **harmed his son?**  
 3 A No.  
 4 **Q Did you have the Highland Park police records**  
 5 **to review?**  
 6 A I believe they sent me the records.  
 7 **Q Who is "they"?**  
 8 A Nikki.  
 9 **Q Did she send you all of the records?**  
 10 A I don't know.  
 11 **Q Did you have the records that showed the child**  
 12 **told them he was hurt playing hockey?**  
 13 A I don't know.  
 14 **Q Have you seen those?**  
 15 A I don't recall.  
 16 **Q Have you seen them?**  
 17 A I don't recall.  
 18 **Q Well, they were the ones who took him to the**  
 19 **Highland Park Police Department; is that correct?**  
 20 MS. CLEMENT: Objection, form.  
 21 **Q Do you know who took the child to Highland**  
 22 **Park Police Department on the evening of April the 22nd**  
 23 **to be questioned?**  
 24 A I don't know.  
 25 **Q Well, whose possession was he in?**

28

1 **Just a minute. Let me reask that.**  
 2 **You're saying here under oath, you're**  
 3 **telling these ladies and gentlemen of the jury, that you**  
 4 **do not know who took this child in to be questioned to**  
 5 **the Highland Park Police Department and the Plano Police**  
 6 **Department?**  
 7 MS. CLEMENT: Who drove him?  
 8 **Q You don't know?**  
 9 MS. CLEMENT: Who drove him to the  
 10 appointment? I don't -- she doesn't --  
 11 **Q Do you know or not?**  
 12 MS. CLEMENT: She doesn't know who drove  
 13 him to the office. It could have been anybody. He  
 14 wasn't --  
 15 **Q Dr. Ritzi, do you know who took this child to**  
 16 **be questioned by the Highland Park Police Department?**  
 17 MS. CLEMENT: Asked and answered.  
 18 **Q Do you know?**  
 19 MS. CLEMENT: Asked and answered.  
 20 MS. MCKNIGHT: She has not answered it.  
 21 MS. CLEMENT: She did answer.  
 22 **Q What did Nikki Ngo tell you when she called**  
 23 **you, Dr. Ritzi, and wanted you to see him and at 5:30**  
 24 **that same day?**  
 25 A Could you repeat -- could you repeat the

29

1 question?  
 2 **Q What did Nikki Ngo tell you -- did Nikki call**  
 3 **you or did Rob?**  
 4 MS. CLEMENT: Objection, assumption. I  
 5 mean, how do you know it was a phone call? Maybe it was  
 6 an email, maybe it was something else.  
 7 MS. MCKNIGHT: I'll be happy to reask it.  
 8 **Q Dr. Ritzi, who contacted you? Whether it was**  
 9 **by phone, email, text message, or smoke signal, which**  
 10 **one contacted you; Rob or Nikki?**  
 11 A Nikki.  
 12 **Q And what did she tell you?**  
 13 A That she had concerns about a bruise.  
 14 **Q And is that an email that you got from her?**  
 15 A I'd have to search through my --  
 16 **Q And if it was an email, it would have been**  
 17 **given to us in your -- the documents that we requested;**  
 18 **would it not?**  
 19 A Yes.  
 20 **Q So if there is no email, was it omitted or**  
 21 **did she call you on the phone?**  
 22 A I don't recall. I don't remember how they  
 23 made the appointment.  
 24 **Q Whether it was email or telephone call, what**  
 25 **did she want? What did she tell you had happened?**

30

1 A She wanted me to check in with Lauriston,  
 2 the -- the child, to ensure that he was okay and if he  
 3 would share anything that could help him feel better or  
 4 just to check in with him.  
 5 **Q That wasn't what Mr. Whiddon wanted here. He**  
 6 **wanted you to extract or massage information out of that**  
 7 **child about an injury, didn't he?**  
 8 MS. HAYES: I'm going to instruct that  
 9 question to not be answered as it pertains to  
 10 attorney-client communications between my client and my  
 11 office.  
 12 **Q Well, Mr. Whiddon shared this email here**  
 13 **with Nikki Alexander, with you, and that would be**  
 14 **waiving any attorney-client privilege.**  
 15 **So I'm going to ask you, did anybody tell**  
 16 **you that this child had already been to a medical**  
 17 **facility and questioned by the police?**  
 18 A I'm sorry, that question was all -- could  
 19 you . . .  
 20 **Q I'll be happy to.**  
 21 **Did anybody tell you whether or not that**  
 22 **child had already been to a medical facility in Plano**  
 23 **and the Highland Park Police Department and questioned**  
 24 **by a policeman from Plano?**  
 25 A Yes.

31

1 **Q And who told you that?**  
 2 A Nikki.  
 3 **Q And so you made that appointment and talked to**  
 4 **him again after you already knew he had been questioned**  
 5 **the night before by the police, by the medical facility,**  
 6 **and by the Highland Park Police Department, didn't you?**  
 7 A My role wasn't to question him.  
 8 **Q Well, you did get this email from**  
 9 **Mr. Whiddon wanting you to massage and extract**  
 10 **information. You did get it and you did read it, didn't**  
 11 **you?**  
 12 MS. HAYES: Objection to form and  
 13 misstates the evidence.  
 14 MS. MCKNIGHT: No, it doesn't.  
 15 **Q Did you read this, Dr. Ritzi?**  
 16 A Yes.  
 17 **Q Thank you.**  
 18 MS. HAYES: More importantly, did you  
 19 read it, Mary, because it's directed to my client?  
 20 MS. MCKNIGHT: But it's shared with  
 21 everybody else.  
 22 MS. HAYES: Regardless, it's directed to  
 23 my client. To indicate that my office is advising  
 24 Dr. Ritzi to do anything when it's addressed to my  
 25 client is --

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1 MS. MCKNIGHT: Objection. Just stay by  
 2 the rules, Kris. You know what it is.  
 3 **Q All right, Dr. Ritzi, after you talked to the**  
 4 **child, was there some reason that that -- Deposition**  
 5 **Exhibit No. 2, would you look at that? April the 24th.**  
 6 **Do you see that now?**  
 7 A I'm loading it.  
 8 MS. CLEMENT: Yeah, give us a second,  
 9 please.  
 10 MS. MCKNIGHT: Okay.  
 11 A Oh, there it is. Exhibit. Okay.  
 12 **Q All right. Dr. Ritzi, you wrote this to Nikki**  
 13 **and you asked her -- you were sending her an update for**  
 14 **our session yesterday but you wanted to send her a HIPAA**  
 15 **form for her lawyers because they have been copied on**  
 16 **the emails and it would be good for them to have it in**  
 17 **their files.**  
 18 **Now, you told Mr. Crockett earlier not to**  
 19 **even copy you on anything that went to his lawyers,**  
 20 **didn't you? Did you not?**  
 21 A I've asked them to be -- yes.  
 22 **Q And you told him if there's anything that**  
 23 **pertained to legal matters, he would be charged not your**  
 24 **rate of \$146 an hour or 48, but 296 an hour; is that**  
 25 **right?**

33

1 A Yes. I've given both of those -- them that --  
 2 **Q Did you -- now, here, not --**  
 3 MS. CLEMENT: Allow the witness to finish  
 4 the --  
 5 **Q Did you have something else to say, Dr. Ritzi,**  
 6 **on that?**  
 7 A Yes.  
 8 **Q Please do.**  
 9 A I have given both of them those instructions.  
 10 **Q But here, Dr. Ritzi, not only are you not**  
 11 **instructing her, you are instructing her to send you a**  
 12 **HIPAA form for her lawyers because they've been copied**  
 13 **on emails already.**  
 14 A I was asking --  
 15 **Q You did, didn't you? You were covering it up**  
 16 **after the fact. And is there anyone else you think we**  
 17 **should complete one for? You were sending out those**  
 18 **HIPAA releases, weren't you?**  
 19 A Because I'd been copied on emails. I'd been  
 20 asked -- I was asking for consents for whoever they --  
 21 **Q Dr. Ritzi, it is pretty clear there from all**  
 22 **that went on that they were trying to build a child**  
 23 **abuse case, a physical child abuse case, against the**  
 24 **father, weren't they?**  
 25 MS. CLEMENT: Objection, form. And,

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1 besides, you don't --

2 MS. MCKNIGHT: You made your objection.

3 MS. CLEMENT: But you don't understand

4 what the email is saying.

5 MS. MCKNIGHT: I understand more than you

6 know. Just -- just state your objection and play by the

7 rules.

8 MS. HAYES: Objection, form.

9 **Q Dr. Ritzi --**

10 MS. CLEMENT: Your question does not

11 reflect that you understand what this email says.

12 **Q Dr. Ritzi, were you aware -- did you become**

13 **aware that they were seeking to build a child abuse case**

14 **against Mr. Crockett?**

15 A I don't know.

16 **Q Well, now, you testified in court about that.**

17 **You said "Well, it appears to be," didn't you?**

18 A I can't speak to what they were -- I can only

19 speak to what was said in session.

20 **Q Well, what did you think she was trying to do**

21 **if she'd been to the police, been to a medical facility**

22 **and two police departments? What did she tell you she**

23 **was trying to do?**

24 A She -- she said she was concerned for her

25 child.

35

1 **Q And do you know who the complaining witness**

2 **was to the police department?**

3 MS. CLEMENT: What -- what is a

4 complaining witness as far as --

5 MS. MCKNIGHT: Does she know who --

6 **Q Did you know that Mr. Rob Cottingham filed the**

7 **complaint or tried to file the complaint against**

8 **Mr. Crockett with the Highland Park Police?**

9 A I believe I was told that.

10 **Q Well, you said they sent you a copy of the**

11 **Highland Park police report. Do you have it?**

12 A It would be in my records if they did.

13 **Q And it says that they were contacted about a**

14 **custody dispute, doesn't it?**

15 A [Audio distortion].

16 **Q Did you notice that? That the Highland Park**

17 **Police Department categorized it as a custody dispute?**

18 MS. CLEMENT: Asked and answered. She

19 doesn't have the document in front of her.

20 **Q Okay.**

21 MS. MCKNIGHT: Get that number, Stephen.

22 Business records, Highland Park Police Department.

23 MR. HOWARD: 53.

24 MS. MCKNIGHT: 53. No. 53?

25 MS. CLEMENT: This is from your file?

36

1 MS. MCKNIGHT: It's on file with the

2 Court.

3 MS. CLEMENT: Well, just because it's on

4 file with the Court does not mean it's part of her

5 record. So that's -- we're trying to establish is it --

6 is it part of a record?

7 **Q Well, you said, Dr. Ritzi, that she -- that**

8 **Nikki Ngo sent you the Highland Park Police Department**

9 **report, didn't you?**

10 MS. CLEMENT: Okay. We are going to find

11 the document in her file that reflects what she knew

12 about the Highland Park Police Department, not some

13 random filing with the Court that she may or may not

14 have ever seen, okay? So please give us a minute.

15 MS. MCKNIGHT: Sure. Take your time.

16 MS. CLEMENT: If you can't find it,

17 that's fine.

18 THE WITNESS: Yeah, I don't -- there's

19 just -- there's literally hundreds of documents.

20 MS. CLEMENT: Yeah. Can you direct us to

21 a number in her chart where she references the police

22 report? Because she cannot find it at this time.

23 MS. MCKNIGHT: We'll move on. She

24 represented -- represented that they had sent it to her.

25 And here it is in ours.

37

1 MS. CLEMENT: Well, I mean, what report?

2 We don't know what report she saw. We don't know what

3 report --

4 MS. MCKNIGHT: Well, she's the one who

5 took the child there. She's the one who generated this

6 report and we have filed it with the Court back in

7 February, so she is on notice.

8 MS. CLEMENT: My client did not take the

9 child to the police department.

10 MS. MCKNIGHT: Yes, they did.

11 MS. CLEMENT: Rochelle did not take the

12 client to the police department.

13 MS. MCKNIGHT: No, she didn't but the

14 mother did.

15 MS. CLEMENT: Okay. Be more specific

16 with your questions.

17 MS. MCKNIGHT: Well, and if you would be

18 less intrusive and want to keep her from answering

19 questions, we would get along a lot faster.

20 MS. CLEMENT: I am not going to be less

21 intrusive.

22 **Q Now, Dr. Ritzi, did you review this report?**

23 A I don't know which report you're referring to.

24 **Q Highland Park police report that is on file**

25 **with the Court under the business records affidavit.**

38

1 MS. CLEMENT: She doesn't know what's on  
 2 file with the Court, okay?  
 3 **Q Dr. Ritzi, did Ms. Cottingham write to you**  
 4 **complaining about --**  
 5 MS. CLEMENT: If you're speaking of  
 6 Deposition Exhibit 2 --  
 7 MS. MCKNIGHT: Could you lower your  
 8 voice? You . . .  
 9 **Q Did you complain -- did you receive a letter**  
 10 **from Ms. Ngo complaining that she had learned in Rob's**  
 11 **deposition that the child said he was hit with a hockey**  
 12 **puck? Do you recall getting that letter?**  
 13 A I recall hearing this. I don't recall where I  
 14 heard it from. There's so many documents.  
 15 **Q Well, and did you reassure her that, "Well,**  
 16 **he's just lying about that"?**  
 17 A No.  
 18 **Q You blamed the child for lying. Do you recall**  
 19 **that?**  
 20 A No.  
 21 **Q Now, to go back to your fear of Mr. Crockett,**  
 22 **when did you become afraid of Mr. Crockett? Can you**  
 23 **pinpoint the time?**  
 24 A It was a gradual discomfort, fear. But there  
 25 was one specific time in which I felt in the waiting

39

1 area at -- when I was in McKinney in which he became  
 2 very frustrated with me.  
 3 **Q Well -- and what did he do? What did he do to**  
 4 **put you in fear?**  
 5 MS. CLEMENT: Objection. Allow her to  
 6 answer the question.  
 7 **Q Answer the question, Dr. Ritzi.**  
 8 A Can you -- can you repeat the question?  
 9 **Q What did Mr. Crockett do, that incident you're**  
 10 **referring to, to place you in fear?**  
 11 A He was -- he sat forward in the couch -- on  
 12 the couch and was directing me and telling me that he  
 13 wanted me to reply to an email.  
 14 **Q He sat forward on the couch and told you he**  
 15 **wanted you to reply to an email?**  
 16 A Yes.  
 17 **Q Anything else that he did to place you in**  
 18 **fear?**  
 19 A It was the tone of voice and just that he  
 20 wasn't taking -- I was explaining that I would speak  
 21 with his lawyer on the phone but I wouldn't reply to  
 22 the email.  
 23 **Q And what did -- other than asking you to reply**  
 24 **to the email, did he do anything else to place you in**  
 25 **fear?**

40

1 A No.  
 2 **Q Now, you testified in court that Mr. Crockett**  
 3 **had been seen in your offices when he didn't have an**  
 4 **appointment. Do you recall that?**  
 5 A Can you repeat the question? I'm sorry.  
 6 **Q You testified before Judge Moore in a hearing**  
 7 **that Mr. Crockett had been seen at your offices when he**  
 8 **did not have an appointment. Do you recall that?**  
 9 A Somebody shared with me in the --  
 10 **Q Do you recall testifying to that?**  
 11 MS. CLEMENT: Objection. Allow her to  
 12 finish the question.  
 13 MS. MCKNIGHT: She's not answering the  
 14 question. She wants to waltz across Texas and we only  
 15 have three hours. Texas is a big state.  
 16 **Q So do you recall testifying that he was seen**  
 17 **stalking in your office without an appointment?**  
 18 MS. CLEMENT: No.  
 19 A No.  
 20 **Q What did you say?**  
 21 A I don't have my testimony in front of me. I  
 22 can't --  
 23 **Q Well, you don't remember? This -- you said**  
 24 **something that hurt a man's reputation and had a big**  
 25 **impact on his life and you don't recall what you said?**

41

1 A Not --  
 2 MS. HAYES: Objection to form.  
 3 A -- verbatim.  
 4 **Q Do you recall what you said?**  
 5 A Not verbatim.  
 6 **Q Well, generally, what did you say?**  
 7 A I was told that someone in my office saw him  
 8 in the -- in the hallway.  
 9 **Q Okay. And did that someone -- now, you've**  
 10 **refused to give him the name of the person, haven't you?**  
 11 A I have not answered that question.  
 12 **Q Well -- and I'm going to ask you again now.**  
 13 **Who told you that? Who stated that Mr. Crockett --**  
 14 MS. CLEMENT: She answered your question.  
 15 She's not going to answer that question. We can ask it  
 16 over and over --  
 17 MS. MCKNIGHT: Just objection, form, and  
 18 please get your face off the screen so I can conduct my  
 19 deposition.  
 20 **Q Now, Dr. Ritzi --**  
 21 MS. CLEMENT: She's not going to answer  
 22 the question.  
 23 **Q -- can you --**  
 24 MS. CLEMENT: Do you understand she's not  
 25 going to answer that question?

42

1 MS. MCKNIGHT: I understand that, ma'am.  
 2 Would you please remove your face so I can conduct my  
 3 deposition?  
 4 MS. CLEMENT: Okay.  
 5 MS. MCKNIGHT: You're being disruptive  
 6 and you're totally violating the rules.  
 7 **Q Dr. Ritzi, when -- when this happened, did --**  
 8 **how did the person -- without naming the name, how did**  
 9 **the person identify Mr. Crockett?**  
 10 A I don't know.  
 11 **Q Did they give you a name?**  
 12 A I don't remember.  
 13 **Q Pardon?**  
 14 A I don't remember.  
 15 **Q Well, did they give you a description?**  
 16 MS. CLEMENT: You're not -- we don't have  
 17 to go into this and she's not --  
 18 MS. MCKNIGHT: Yes, we do. We do. And,  
 19 ma'am, you're not helping your client.  
 20 **Q Dr. Ritzi --**  
 21 MS. CLEMENT: Well, guess what, you're  
 22 not helping yours, okay?  
 23 MS. MCKNIGHT: Thank you. I think he'll  
 24 take his chances with me. Now, if you would remove your  
 25 face, I'd like to question your client.

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1 MS. CLEMENT: And please be more polite.  
 2 MS. MCKNIGHT: Well, I take my cues from  
 3 you.  
 4 **Q Now, Dr. Ritzi, what information -- without**  
 5 **naming the name of the person, what information was**  
 6 **given to you to make you state in court that my client**  
 7 **was seen at your office?**  
 8 MS. CLEMENT: Outside of her office.  
 9 THE REPORTER: Say that again. I didn't  
 10 hear you.  
 11 MS. CLEMENT: Outside of her office.  
 12 **Q You stated to the Court that he was seen in**  
 13 **the water fountains and the hallways by the restroom,**  
 14 **didn't you?**  
 15 A We don't have water fountains by our hallway.  
 16 **Q Where did you say he was seen?**  
 17 A I was told that he was seen in the hallway  
 18 outside of our offices.  
 19 **Q And who was seen? Was he named?**  
 20 A I don't recall.  
 21 **Q And, yet, you did make that information**  
 22 **available to the Court?**  
 23 A I don't recall if they knew his name.  
 24 **Q And that's what you're saying here today.**  
 25 **Now, he wrote to you and asked you for information about**

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1 **that incident, didn't he?**  
 2 MS. CLEMENT: He who wrote to her?  
 3 MS. MCKNIGHT: Lauriston Crockett, III.  
 4 She knows who I mean. You're just disrupting.  
 5 **Q Do you know --**  
 6 MS. CLEMENT: No --  
 7 **Q -- what I mean, Dr. Ritzi? Do you know who I**  
 8 **mean?**  
 9 A Can you repeat the question?  
 10 **Q Did Mr. Crockett write to you and ask you for**  
 11 **information about the incident?**  
 12 A Yes.  
 13 **Q Did he ask you for any videotapes that might**  
 14 **exist?**  
 15 A Yes.  
 16 VIDEOGRAPHER: Can you move the camera  
 17 over?  
 18 **Q And did you tell him that you would --**  
 19 VIDEOGRAPHER: I just need the camera for  
 20 the witness to -- to move over and I need to get the  
 21 attorney out.  
 22 MS. CLEMENT: No, I'm going to stay in,  
 23 so just go ahead and film it the way it is.  
 24 VIDEOGRAPHER: No, ma'am. Slide the  
 25 camera over so I can center you like the judge had asked

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1 me to.  
 2 MS. CLEMENT: I don't believe the judge  
 3 asked you to do anything. Just go ahead and film it the  
 4 way it is. Go ahead.  
 5 MS. MCKNIGHT: You are violating the  
 6 rules, ma'am, and this is not your deposition. It is  
 7 Dr. Ritzi's.  
 8 **Q Now, Dr. Ritzi, did you tell Mr. Crockett in**  
 9 **writing that it would take some research for you to find**  
 10 **out the dates?**  
 11 A Yes.  
 12 **Q And did you get back to him on that?**  
 13 A Eventually.  
 14 **Q Well, did you write to him and tell him when**  
 15 **it was?**  
 16 A I told him when I was on vacation because I  
 17 was out of the country at the time.  
 18 **Q And it was after January the 15th, 2020, when**  
 19 **you told him that, wasn't it?**  
 20 A I don't recall the dates.  
 21 **Q It was after your court appearance because you**  
 22 **didn't -- back in the fall when you were -- in 2019,**  
 23 **when you were giving the information to the Court, you**  
 24 **didn't say when it happened, did you?**  
 25 A I don't recall.

46

1       **Q** And isn't it a fact, ma'am, that you,  
 2 **Dr. Ritzki, had written to Mr. Crockett prior to leaving**  
 3 **for your vacation and told him when you would be out of**  
 4 **the country, didn't you?**  
 5       A I'm sorry, could you repeat that?  
 6       **Q** Yes.  
 7             **You, Rochelle Ritzki, wrote to**  
 8 **Mr. Crockett on a scheduling matter and told him prior**  
 9 **to leaving the country the exact dates you were going to**  
 10 **be out of the country, didn't you?**  
 11       A If it's in my records, I did. I don't recall.  
 12       **Q** If it's in your records. So if he knew when  
 13 you were going to be out of the country, did you stop to  
 14 think what would he be doing stalking you if you're out  
 15 of the country?  
 16       A I didn't -- the question is leading. I  
 17 didn't --  
 18       **Q** Well, I can lead, Dr. Ritzki. It's -- I'm  
 19 trying to find out why you would accuse a man of  
 20 stalking you when you had written and told him you were  
 21 going to be out of the country. And let me find that  
 22 letter.  
 23       A I didn't accuse him of stalking.  
 24       **Q** What did you accuse him of doing?  
 25       A I didn't accuse him of anything.

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1       **Q** Why did you bring it up?  
 2       A I was told that he was in the office.  
 3       **Q** Well, what -- why would that be a cause for  
 4 alarm?  
 5       A Because at that time, if I remember correctly,  
 6 the -- the -- something had come out in which the mother  
 7 was -- had shared that she was scared of --  
 8       **Q** Let me understand this -- go -- are you  
 9 finished?  
 10       A Yeah, I don't -- I'm trying to go from memory  
 11 here.  
 12       **Q** Look, something had come out and the mother  
 13 shared that she was scared, so you told that in court.  
 14 Is that your testimony?  
 15       A I was asked if I had [audio distortion].  
 16 I'm -- I'm not sure of the question.  
 17       **Q** I'm asking you why you brought it up.  
 18       A Because I was asked the question.  
 19       **Q** Which question? And you were asked a lot of  
 20 questions by Ms. Hayes. Does the name John Battaglia  
 21 mean anything to you?  
 22       A No.  
 23       **Q** Were you ever -- did you have any discussions  
 24 with Ms. Hayes where my client, Lauriston Crockett, III,  
 25 was compared to a CPA who murdered his children?

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1       A I remember that from court, but I don't  
 2 remember having a conversation with Ms. Hayes about  
 3 that.  
 4       **Q** Okay. Do you remember having a conversation  
 5 with anyone about Mr. Crockett being likely to kill his  
 6 children?  
 7       A No.  
 8       **Q** And in court, so we're clear, that you had not  
 9 told Mr. Crockett the dates of his alleged appearance at  
 10 your office before January 2020, January the 15th, I'm  
 11 looking at page 27 of the record, the reporter's record,  
 12 of your testimony, by Ms. McKnight:  
 13 "Can we have the date, Dr. Ritzki?"  
 14 "I don't know the exact date. All I know  
 15 is when I was on vacation."  
 16 And that was the first time you even gave  
 17 him a date, wasn't it?  
 18       A I'm -- if it's in the record. I don't recall.  
 19       **Q** It's in the record, I assure you.  
 20 MS. MCKNIGHT: And I would ask that  
 21 Dr. Ritzki's lawyer, again, I'm going to ask that she  
 22 remove her face from the screen and stop smirking and  
 23 laughing and making noises. She's very disruptive of  
 24 the deposition.  
 25       **Q** Now, when you were out of the country,

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1 **Dr. Ritzki, did you set up an arrangement so that the**  
 2 **Cottingshams could even contact you by Zoom and stay in**  
 3 **daily contact with you while you were on vacation?**  
 4       A They had my contact information.  
 5       **Q** Did you furnish that to them and invite them  
 6 to contact you by Zoom?  
 7       A They asked for -- Nikki asked for a session,  
 8 if I remember correctly.  
 9       **Q** Just answer yes or no. Did you furnish them  
 10 and invite them to contact you by Zoom while you were  
 11 out of the country on vacation?  
 12       A After they requested a session -- or she  
 13 requested a session.  
 14       **Q** Now, what -- do you recall when Ms. -- in  
 15 August 2019 when Nikki Ngo asked you to contact Vickie  
 16 Alexander and asked her to call the judge at home and  
 17 get the orders changed?  
 18       A I'm sorry, could you repeat the question?  
 19       **Q** Do you recall around -- on or about August the  
 20 9th or 10th, 2019, did you contact -- did Nikki Ngo  
 21 contact you and ask you to contact judge -- Vickie  
 22 Alexander and ask her to call the judge at home to try  
 23 to get the orders changed, that she was sure that  
 24 Mr. Crockett was going to go postal and kill everybody?  
 25 Do you remember that?

50

1 A I remember the email.

2 **Q Okay. And did you call Vickie Alexander the**

3 **way she demanded?**

4 MS. HAYES: Objection to form.

5 **Q Did you call Vickie Alexander?**

6 A No.

7 **Q Did you ask her to call the judge at home?**

8 A No. I remember I sent -- replied to an

9 email [audio distortion] --

10 **Q -- send that email on to -- on to Nikki**

11 **Alexander -- Vickie Alexander?**

12 A Can you repeat the question?

13 **Q Did you send Ms. -- let me see if I can get my**

14 **folder here. Did you send Ms. Nikki Ngo's email on to**

15 **Vickie Alexander where she was wanting her to call the**

16 **judge at home?**

17 A I believe I forwarded the email to Vickie.

18 **Q And do you recall what Vickie Alexander's**

19 **response was?**

20 A No.

21 **Q Did you think that was your job -- I mean, you**

22 **were responding to her hysteria, weren't you?**

23 A I shared the email with Vickie.

24 **Q Now, Deposition Exhibit No. 25 to you. Have**

25 **you found it?**

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1 A It's -- it's loading. I found it.

2 **Q All right. It's dated August 9th, and it's --**

3 **this one is addressed to you. And it says --**

4 MS. CLEMENT: Well, I'm still reading it.

5 MS. MCKNIGHT: Okay. Go ahead and read

6 it.

7 (Witness and client conferring.)

8 MS. CLEMENT: Went to school at

9 Hightower?

10 THE WITNESS: That was his school

11 previously.

12 MS. MCKNIGHT: I would object to -- to

13 conferences between attorney and client.

14 MS. CLEMENT: Okay. That's why I'm here

15 is for us to have attorney-client privileged

16 discussions.

17 A Were you waiting for me to answer a question?

18 I'm sorry.

19 **Q Have you now read the letter, Dr. Ritzi?**

20 A Yes, ma'am.

21 **Q All right. This is addressed to you and she's**

22 **asking you until the Court can meet and change orders,**

23 **she's wanting you -- "Can you please contact Vickie and**

24 **ask her to contact the judge on Logan's behalf so we do**

25 **not have to meet Mr. Crockett." And she's saying that**

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1 **Mr. Crockett is going to completely lose his mind and go**

2 **postal. Do you see that?**

3 A Yes.

4 **Q What did going postal mean to you?**

5 A What it meant to -- I don't understand the

6 question.

7 **Q You -- you're telling this Court and jury that**

8 **you do not understand the term going postal and losing**

9 **his mind in connection with [audio distortion]?**

10 A I do understand the definition that people

11 use. I didn't know if that was what you were asking.

12 **Q Of course it's what I'm asking you. It would**

13 **be in the context of this letter, Dr. Ritzi.**

14 A From what I understand, when someone says go

15 postal, they typically mean that they're going to harm

16 someone, go in and shoot someone.

17 **Q Exactly. And did you have any reason to**

18 **believe that Mr. Crockett was going to do a mass**

19 **shooting of any kind?**

20 A No.

21 **Q Had you ever seen him with a gun?**

22 A No.

23 **Q Had he ever threatened you with a gun?**

24 A No.

25 **Q Had Mrs. Ngo ever said he threatened her with**

53

1 **a gun?**

2 A I don't recall.

3 MS. HAYES: Mary, could you tell me what

4 exhibit number you're on?

5 MS. MCKNIGHT: No. 25.

6 MS. HAYES: Thanks.

7 **Q And No. 26.**

8 MS. CLEMENT: Is this from her record,

9 her files?

10 MS. MCKNIGHT: It's from the Court's

11 file.

12 MS. CLEMENT: Okay. Why is she looking

13 at something from the Court's files? She doesn't have

14 any knowledge of it.

15 MS. MCKNIGHT: Well, it's referred to in

16 her rec- -- our attorney presented the Court, the judge,

17 with a request for temporary restraining order, but

18 since our attorney was the only one to speak with the

19 judge, he denied it.

20 MS. CLEMENT: I can read the exhibit. I

21 see the -- I understood what's referenced, but --

22 MS. MCKNIGHT: You know something, if you

23 would just --

24 MS. CLEMENT: -- I object to relevance.

25 Okay, I'm going to object to relevance. This is a court

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1 document. She's a therapist. This has nothing to do  
 2 with her records. Unless you can point to where in her  
 3 records --  
 4 MS. MCKNIGHT: Never mind. Never mind.  
 5 Listen, you are being so disruptive and so out of line,  
 6 ma'am.  
 7 MS. CLEMENT: Okay.  
 8 MS. MCKNIGHT: And so . . .  
 9 **Q Now, you did send it on to Vickie Alexander,**  
 10 **didn't you?**  
 11 A I forwarded Nikki's email.  
 12 **Q Did you consider these to be legal documents**  
 13 **that you were forwarding and receiving, doing with court**  
 14 **action?**  
 15 A What is --  
 16 **Q Did you bill it at your legal rate -- did you**  
 17 **bill this at your legal rate for sending these all**  
 18 **around and receiving or reading these?**  
 19 A I don't recall.  
 20 **Q They would definitely be in the legal realm,**  
 21 **would they not, Dr. Ritzi?**  
 22 A Yes. If you're referring to my -- my consent.  
 23 **Q And then look at Deposition Exhibit No. 5.**  
 24 **When you were out of the country, you were responding to**  
 25 **Rob's e-mails and to her -- to Ritz- -- to Nikki's**

55

1 **emails; were you not?**  
 2 MS. CLEMENT: Okay. Give us a chance to  
 3 read it, please.  
 4 Okay. Thank you.  
 5 MS. MCKNIGHT: All right.  
 6 **Q Now, why didn't you -- here on August the 5th,**  
 7 **and you're on vacation out of the country, right?**  
 8 A Yes.  
 9 **Q And you didn't tell her not to try to build a**  
 10 **case. You responded to her emails where she's telling**  
 11 **you Logan said "Daddy said he was going to hurt Underdog**  
 12 **Kennels (our business). Logan asked me if I thought his**  
 13 **dad is a scam artist. Of course, I said no. He said he**  
 14 **was worried I was going to get run over again. He**  
 15 **dreamt that Rob had an infected tooth. It was a very**  
 16 **upsetting night for him. I just held him as he cried**  
 17 **and told him everything would be okay. I don't know if**  
 18 **this is coming out because of escalation of his dad**  
 19 **being more controversial in front of us lately... We're**  
 20 **looking forward to when you get back. Have a wonderful**  
 21 **trip."**  
 22 **Now, why were you carrying on this**  
 23 **dialogue with her when you were out of the country?**  
 24 A I don't understand the question. I mean, as a  
 25 therapist, at times if I see a client in distress, I may

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1 reach out.  
 2 **Q Well, do you understand asymmetrical**  
 3 **relationships with clients? You had a very different**  
 4 **relationship with -- with Mr. Cottingham than you did**  
 5 **with Rob and Nikki Ngo, didn't you?**  
 6 A Not initially.  
 7 **Q Well, but you did, didn't you? They didn't --**  
 8 **A No [audio distortion].**  
 9 **Q -- the same treatment, did they?**  
 10 A Yes, they -- they -- I both treated them  
 11 equally in the beginning. [Audio distortion --]  
 12 **Q In the beginning.**  
 13 A -- the father --  
 14 **Q You cannot say, Dr. Ritzi, that you were**  
 15 **treating them equally where you were setting -- you were**  
 16 **sending -- asking for HIPAA releases for her lawyers and**  
 17 **telling him not to have his lawyer contact you. That is**  
 18 **not equal treatment, is it?**  
 19 A I don't believe that's accurate.  
 20 **Q Well, you're still -- you're saying here,**  
 21 **you're telling this Court and jury and anyone else who's**  
 22 **interested, that you treated these parties equally?**  
 23 A Yes.  
 24 **Q All the way through?**  
 25 A When Mr. Crockett was in my office and having

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1 sessions, it was -- I treated them equally. It wasn't  
 2 until Mr. Crockett was continually copying me on lots  
 3 of emails and demanding that I respond in a certain  
 4 way that the relationship, I felt, strained.  
 5 **Q Now, Mr. Crockett, after you accused him of**  
 6 **stalking, didn't contact you anymore, did he?**  
 7 A I never accused him of stalking.  
 8 MS. HAYES: Objection to form.  
 9 **Q After the stalking allegation of him being**  
 10 **there at your office, he never contacted you anymore**  
 11 **after that, did he?**  
 12 A I -- I don't recall when that was.  
 13 **Q Did he contact you anymore after that**  
 14 **situation on --**  
 15 A No.  
 16 **Q -- the stalking?**  
 17 **All right. And you kept inviting him**  
 18 **back to your office, didn't you?**  
 19 A No.  
 20 **Q You did not invite him in writing to come and**  
 21 **talk with you about Lauriston?**  
 22 A I didn't invite him to come to my office; I --  
 23 I offered to connect with him.  
 24 **Q You didn't offer to have him come in and talk.**  
 25 **That's your testimony under oath?**



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1 A No. The email that I'm recalling, there  
 2 was --  
 3 **Q Just answer the question, ma'am, if you can.**  
 4 **If you can't --**  
 5 MS. CLEMENT: Objection. Objection.  
 6 Allow her to finish answering your question.  
 7 MS. MCKNIGHT: [Audio distortion] on the  
 8 chalkboard, ma'am. If you could just tone it down a  
 9 little bit, please.  
 10 MS. CLEMENT: Please allow her to answer  
 11 the question, okay?  
 12 MS. MCKNIGHT: I want her to answer the  
 13 question that is asked.  
 14 **Q Dr. Ritzi, did you ever write and suggest that**  
 15 **Mr. Crockett come to your office and see you?**  
 16 MS. CLEMENT: Did she ever say that?  
 17 **Q After the stalking incident, did you cont- --**  
 18 A I -- I don't --  
 19 MS. MCKNIGHT: Ma'am, don't hackle. It  
 20 is very unprofessional.  
 21 **Q And, Dr. Ritzi, would you please answer the**  
 22 **question?**  
 23 A I don't recall because I don't have the dates  
 24 that you're referring to. It's hard for me to answer  
 25 the question vaguely because I know that there was a

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1 time that I had continually tried to reach out to  
 2 Mr. Crockett to invite him still in the process.  
 3 **Q And, Dr. Ritzi, you understand, of course, Dr.**  
 4 **-- Mr. Crockett wrote to you and told him -- told you in**  
 5 **writing that two different professionals had discussed**  
 6 **countertransference and transference with him. Do you**  
 7 **recall that letter?**  
 8 A I don't recall.  
 9 **Q You know what countertransference is; do you**  
 10 **not?**  
 11 A Yes, ma'am.  
 12 **Q And you've said that you are afraid of**  
 13 **Mr. Crockett, we established that pretty early on,**  
 14 **didn't you?**  
 15 A In court they asked if I was fearful or some  
 16 to that degree.  
 17 **Q And you've said over and over that you're**  
 18 **fearful, haven't you?**  
 19 A I don't believe I've said over and over.  
 20 **Q Dr. Ritzi, is it ethical to continue to see a**  
 21 **parent's child if you are in fear of the parent?**  
 22 MS. CLEMENT: Yes.  
 23 A Yes.  
 24 **Q And can you tell the Court why transference or**  
 25 **countertransference would not apply if you are fearful**

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1 **of the parent?**  
 2 A I don't --  
 3 **Q And you're claiming now -- you're claiming the**  
 4 **child is afraid of his father.**  
 5 A I don't believe that I have shown the client  
 6 that there have been times that I have been fearful of  
 7 Mr. Crockett.  
 8 **Q Well, isn't that a subconscious thing,**  
 9 **Dr. Ritzi? Fear?**  
 10 A I don't understand.  
 11 **Q You don't understand transference and**  
 12 **countertransference?**  
 13 A I don't understand the question.  
 14 **Q Why is countertransference and transference a**  
 15 **prohibited -- why is it not ethical for people who are**  
 16 **in fear of a parent to treat the parent's child?**  
 17 MS. HAYES: Objection to form.  
 18 **Q Do you know?**  
 19 MS. CLEMENT: That's an incorrect  
 20 statement.  
 21 MS. MCKNIGHT: Objection, form. Ma'am,  
 22 please, please play by the rules.  
 23 MS. CLEMENT: Objection, form.  
 24 **Q Dr. Ritzi, is it ethical for a person who -- a**  
 25 **professional who has fear of a parent to treat that**

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1 **parent's child?**  
 2 MS. HAYES: Objection to form.  
 3 **Q You can answer.**  
 4 MS. CLEMENT: If you know.  
 5 A That's such a vague question. I mean, there's  
 6 so many other stipulations that it --  
 7 **Q [Audio distortion].**  
 8 A -- surface. No, it's not unethical.  
 9 **Q It's not unethical. And can you cite me in**  
 10 **your ethical rules of conduct where it says that it's**  
 11 **okay, that you don't have to withdraw when you have a**  
 12 **conflict and have fear of a parent?**  
 13 A I don't --  
 14 MS. HAYES: Objection to form.  
 15 A I don't believe it's in the -- my rules that  
 16 if I have fear of a parent that I shouldn't see the  
 17 child.  
 18 **Q And that's what you believe?**  
 19 A I don't -- I don't recall that wording in the  
 20 rules.  
 21 **Q Well, have you read them recently?**  
 22 A Yes.  
 23 **Q Now, have you made any recommendations -- now,**  
 24 **you were contacted about -- by Ms. Nikki Ngo about**  
 25 **Mr. Crockett seeing his son at Christmas; were you not?**

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1 A I'm sorry, could you repeat that?

2 **Q Nikki Ngo contacted you about seeing -- about**

3 **visitation at Christmas, didn't she, for Mr. Crockett?**

4 A I'm sorry, can you please repeat just the

5 question? I'm having a hard time following your --

6 **Q All right. Did Nikki Ngo ask you for a**

7 **recommendation about whether Mr. Crockett should be able**

8 **to visit with --**

9 A I don't --

10 **Q -- his son at his home?**

11 A I don't recall her asking me for a

12 recommendation.

13 **Q Did you make a recommendation?**

14 A What I recall -- I didn't make a

15 recommendation. I recall various ways to handle

16 whatever she decided.

17 **Q What did you tell her?**

18 A I don't have the -- my -- the email in front

19 of me or the con- -- the note in front of me. However,

20 from what I recall, that she needed to ensure that she

21 doesn't allow anything going on for her to affect -- you

22 know, not to say anything negative about the dad, that

23 she needs to be mindful of giving the child the choice.

24 **Q You told her that her fear could be**

25 **transmitted to the child, didn't you? Her fear of**

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1 **Mr. Crockett.**

2 A If it's in the email, that would -- sounds

3 like something I would -- I would say.

4 **Q Well, why wouldn't your fear be transmittible**

5 **to the child as well, Dr. Ritzi?**

6 A As a mental health professional, I'm -- my

7 role is not -- my role is in the session with my client

8 and be working with my client in that role.

9 **Q Now, when Ms. Ngo was just, you know, back in**

10 **-- on August 10th where she was -- look at Deposition**

11 **Exhibit No. 23. Have you read it? Have you read**

12 **No. 23, Dr. Ritzi?**

13 A Yes.

14 **Q Now, she's writing you again while you're**

15 **still out of the country; is that correct?**

16 A I -- I don't remember the exact dates that I

17 was gone, but . . .

18 **Q Well, you said you were gone between**

19 **August 1st and August the 18th. So August the 11th**

20 **would fall into that parameter; would it not?**

21 A Yes, ma'am.

22 **Q Okay. So you're telling -- you're telling**

23 **Dr. Ritzi -- and, again, why were you calling her about**

24 **it or why was she calling you about it or contacting you**

25 **about "The Court can find me in contempt. I don't care.**

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1 **The safety of my family is of paramount to me right now.**

2 **I'm sure everyone in El Paso wishes someone had acted**

3 **before it's too late. We are not even staying at home.**

4 **We're staying in a hotel"?**

5 MS. HAYES: Objection to form.

6 **Q Do you see that?**

7 A Not everything you've just read.

8 **Q Well, would you like to take your time and**

9 **read it? August 10th, 2019, 10:14 a.m. to you.**

10 A Okay.

11 **Q And what did she want you to do then?**

12 A I'm not sure what she was wanting me to do.

13 **Q Now, did you get an email from her on**

14 **August 12th after all of the drama and all of this**

15 **hellfire and brimstone saying "I haven't heard a peep**

16 **out of him"? Do you recall that?**

17 A Vaguely remember that email.

18 **Q I haven't heard a peep out of him. And all of**

19 **this postal and killing everybody and you've got to call**

20 **the judge at home, all of that was a big nothing, wasn't**

21 **it?**

22 MS. HAYES: Objection to form.

23 **Q What has Mr. Crockett done since August 2019**

24 **to put anybody in fear, Dr. Ritzi?**

25 MS. HAYES: Objection to form.

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1 **Q What has he done that you know of or have been**

2 **told?**

3 A Can I ask a quick question? I know -- when

4 someone says objection to form, is that -- am I --

5 **Q That means you -- you answer the question.**

6 A Okay. Oh. Can you repeat the question, then?

7 **Q Yes.**

8 **What -- since August the [audio**

9 **distortion] 2019, what has Mr. Crockett done to place**

10 **anybody in fear?**

11 MS. HAYES: Objection to form.

12 **Q Or that you've been told that he's done?**

13 A I don't recall anyone telling me he's done

14 anything in reference to what you're saying.

15 **Q That's what I'm saying. I'm asking about**

16 **terroristic threats, I'm asking about violence, I'm**

17 **asking about causing anybody to be in fear of their**

18 **life. What?**

19 A Nothing like that has been reported to me.

20 **Q And, yet, as of -- oh. Let me ask you this:**

21 **Did Nikki Ngo, when you began seeing Lauriston, tell you**

22 **that she was sleeping with her child in his lower bunk?**

23 A I don't recall.

24 **Q Well --**

25 A I know I came to understand this later, but I

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1 don't remember when she --

2 **Q She didn't tell you, did she?**

3 MS. HAYES: Objection to form.

4 A I don't remember when I learned of that.

5 **Q You learned basically when we pointed it out**

6 **to you in court, didn't you?**

7 A I don't recall.

8 **Q In a lower bunk bed with an eight-year-old**

9 **child about to turn nine. You learned that --**

10 MS. CLEMENT: Asked and answered.

11 MS. HAYES: Objection to form.

12 **Q Didn't you, Dr. Ritzi?**

13 MS. CLEMENT: Objection, asked and

14 answered. She said she doesn't recall.

15 MS. MCKNIGHT: Ma'am --

16 **Q Dr. Ritzi, did you -- did you tell her -- did**

17 **you tell Nikki Ngo -- had she discussed it with you many**

18 **times and you told her that it was okay for her to sleep**

19 **in the bed with him?**

20 A I believe that's out of context. What we're

21 talking about was with everything else going on that a

22 child's sleep is important, and if -- if he's being

23 stressed out because he can't sleep, then they need to

24 work towards him being able to sleep alone.

25 **Q Well -- and that had been going on for nearly**

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1 **two years when you found out about it, was -- hadn't it?**

2 A I don't know the -- the times or dates or how

3 long.

4 **Q Well, if the whole time that she's lived with**

5 **Mr. Cottingham he has slept in the bed with her, she has**

6 **slept in the bed -- in the child's bed, in the lower**

7 **bunk bed with the child, that is -- that is an issue,**

8 **isn't it?**

9 MS. HAYES: Objection to form.

10 A The question is vague. I'm not sure how to

11 answer that question.

12 **Q Let me rephrase that.**

13 **If she has since she moved in with Rob**

14 **Cottingham in 2017 slept in the lower bunk bed with**

15 **Lauriston Crockett, IV, is that something that you, as**

16 **the therapist, should know?**

17 A I would like to know if the child's having

18 sleep issues and unable to help himself fall asleep at

19 night.

20 MS. MCKNIGHT: Objection, nonresponsive.

21 **Q Do you think it's an issue that he is sleeping**

22 **in a lower bunk bed with his mother for two and a half**

23 **years?**

24 MS. CLEMENT: Asked and answered.

25 Objection to form. She already answered it.

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1 MS. HAYES: Objection to form.

2 **Q Can you answer that, Dr. Ritzi?**

3 MS. CLEMENT: She already answered it.

4 Let's move along.

5 MS. MCKNIGHT: You're not the witness,

6 ma'am.

7 **Q Dr. Ritzi, is that an issue that you, as the**

8 **therapist, the child's therapist, should be aware of?**

9 A I would hope that if a child is having a hard

10 time self-soothing to fall asleep at night that they

11 would -- that they would share that with me.

12 **Q Did she share it with you?**

13 A At some point, yes. I just don't know when.

14 **Q What point?**

15 MS. HAYES: Objection to form.

16 **Q Now, you do know that she made a very large**

17 **issue claiming that the child slept with Mr. Crockett,**

18 **didn't she?**

19 A I recall her saying that.

20 **Q And then do you recall her saying that -- when**

21 **asked about why she was sleeping with the child,**

22 **"because Mr. Crockett have made it that way"? Do you**

23 **recall her saying that?**

24 A I don't recall.

25 **Q Now, Ms. Hayes asked you back in January when**

69

1 **we were at the hearing, you stated "He loves both of his**

2 **parents and he wants both of his parents to be pleased**

3 **with him." Do you think he loves both of his parents?**

4 A Yes.

5 **Q Well, what has happened with the father that**

6 **he loved?**

7 MS. HAYES: Objection to form.

8 A I'm -- I'm not under- -- I'm not following

9 your question, I'm sorry.

10 **Q Well, you stated here earlier today that he**

11 **didn't even want to have lunch in the park or dinner in**

12 **the park with his father because he's scared of him.**

13 **That was your testimony; is that right?**

14 A That's what he -- that's what he said.

15 **Q Does that sound like alienation to you,**

16 **Dr. Ritzi?**

17 A I am unable to know where or why he's [audio

18 distortion]. I quoted what he said.

19 **Q Now, Mr. Crockett is not being supervised**

20 **because he has a drug habit, a violence habit, a**

21 **drinking habit, anything like that, is he?**

22 MS. HAYES: Objection to form.

23 A I -- I -- I'm not -- I don't know.

24 **Q Alienation is the charge, isn't it?**

25 MS. HAYES: Objection to form.

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1 **Q Why is he being supervised?**  
 2 MS. HAYES: Objection to form.  
 3 A The Court says.  
 4 **Q But on what basis are you -- you're this**  
 5 **child's therapist, and have been for over two years, and**  
 6 **you don't know why the father's being supervised?**  
 7 A I don't know the decision, you know, the  
 8 specific reasons of what -- where the Court --  
 9 **Q Well, one of the reasons, according to**  
 10 **Ms. Frendle, is that he was seen stalking at your**  
 11 **office. Do you think that had something to do with it**  
 12 **originally?**  
 13 MS. HAYES: Objection to form.  
 14 MS. CLEMENT: Objection to form. She  
 15 doesn't know what's in the social study evaluation.  
 16 MS. MCKNIGHT: Oh, I beg to -- I differ  
 17 with you. She does.  
 18 THE WITNESS: No, I don't.  
 19 MS. CLEMENT: She's never read the social  
 20 study evaluation. She's never seen a copy of it.  
 21 MS. MCKNIGHT: Ma'am, ma'am, you are  
 22 totally out of line.  
 23 MS. CLEMENT: Well, that's accurate.  
 24 MS. MCKNIGHT: No, ma'am.  
 25 MS. CLEMENT: Did you find a copy of the

71

1 evaluation in her notes?  
 2 MS. MCKNIGHT: Please, ma'am, just stick  
 3 to the rules and please keep your face off the screen  
 4 and tone your voice down. And stop -- you're being --  
 5 making very improper snickering and -- and sound  
 6 effects.  
 7 **Q Now --**  
 8 MS. CLEMENT: Can we just [audio  
 9 distortion]?  
 10 **Q Okay, yeah, here's one that I wanted you to**  
 11 **review. Deposition Exhibit No. 6. March 6th, 2020.**  
 12 A Yes.  
 13 **Q Have you read it, Dr. Ritzi?**  
 14 A Yes.  
 15 **Q Now, what was she contacting you about on**  
 16 **March the 6th for this, you called it, family**  
 17 **psychotherapy?**  
 18 A That's -- that's the -- the billing code.  
 19 **Q Well, are you treating anyone in that family**  
 20 **other than the child?**  
 21 A No.  
 22 **Q Now, "Mother requested to speak to the**  
 23 **therapist learning child reported that he was hurt while**  
 24 **playing hockey (previous event that resulted in medical**  
 25 **dispute between mother and father). Mother stated that**

72

1 **during stepfather's deposition, stepfather learned that**  
 2 **client stated he was hurt while playing hockey, and**  
 3 **mother requested to discuss the client lying and overall**  
 4 **telling multiple stories regarding how he was bruised.**  
 5 **Therapist and mother discussed distance between the**  
 6 **incident and learning about what was said, and discussed**  
 7 **possible reasons why children lie."**  
 8 **Now, Dr. Ritzi, who was the first person**  
 9 **here back -- going back to April the 22nd, 2019, who**  
 10 **questioned that child first?**  
 11 A I don't know who questioned him first.  
 12 **Q Well, have you -- did you not learn that Rob**  
 13 **Cottingham first questioned him?**  
 14 A I don't recall.  
 15 **Q Well, do you think it's important? And Nikki**  
 16 **questioned him and then the police questioned him.**  
 17 MS. CLEMENT: Is that a question or a  
 18 statement?  
 19 MS. MCKNIGHT: I'm asking if she's aware  
 20 of that?  
 21 A I don't know --  
 22 MS. MCKNIGHT: It is a question, ma'am.  
 23 A I don't recall the order of events.  
 24 **Q Well, you recall when he got to you the next**  
 25 **day.**

73

1 A Yes.  
 2 **Q And then you questioned him. He told you he**  
 3 **didn't want to talk about --**  
 4 A I didn't question him.  
 5 **Q That child told you he didn't want to talk**  
 6 **about it, didn't he, Dr. Ritzi?**  
 7 A That's correct.  
 8 **Q And could you imagine why he doesn't -- was it**  
 9 **easy to understand why he didn't want to talk about it**  
 10 **anymore?**  
 11 A I -- I don't know.  
 12 **Q Well, if he's been questioned until**  
 13 **11:00 o'clock the night before and questioned by Rob**  
 14 **Cottingham beforehand and Nikki Ngo beforehand and then**  
 15 **by you, don't you think he's pretty worn out?**  
 16 A I imagine that he would tell me how he felt,  
 17 and he didn't -- he said he didn't want to talk about  
 18 it.  
 19 **Q And he has told you he doesn't want to talk**  
 20 **about his father, hasn't he?**  
 21 A Yes.  
 22 **Q In your notes at least a dozen times "I don't**  
 23 **want to talk about it"?**  
 24 A That's correct.  
 25 **Q He doesn't feel safe talking about his father**

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1 **with you, does he?**  
 2 MS. HAYES: Objection to form.  
 3 A I can't -- I don't know the -- his reason for  
 4 not wanting to talk about his father.  
 5 **Q Well, he has never wanted to, has he?**  
 6 A He has recently and he has in the past. It  
 7 just -- in some sessions he didn't want to.  
 8 **Q What has changed recently?**  
 9 MS. HAYES: Objection to form.  
 10 **Q What has changed recently that he's now**  
 11 **willing to talk about his father?**  
 12 MS. HAYES: Objection to form.  
 13 A I don't -- I don't know. I'm not -- I mean,  
 14 there's -- could be lots of different --  
 15 **Q Now, this father is supervised for the last**  
 16 **ten months at Hannah's House, hasn't he been?**  
 17 A I believe so.  
 18 **Q And there's somebody there writing down**  
 19 **everything that is said or done?**  
 20 A That's my understanding.  
 21 **Q And you have no way of knowing what is said**  
 22 **with -- to that child in that apartment that is occupied**  
 23 **by Rob Cottingham and Nikki Ngo, do you?**  
 24 A That's correct.  
 25 **Q And you know that they have called him a**

75

1 **conman, a pathological liar, they have said that he has**  
 2 **all kinds of mental disorders. And you have not seen**  
 3 **any proof of any of that, have you?**  
 4 A I haven't evaluated Mr. Crockett.  
 5 **Q No. And, yet, you've made recommendations**  
 6 **about his access, haven't you?**  
 7 MS. HAYES: Objection to form.  
 8 A I don't believe I have.  
 9 **Q Well, you've said here that he just -- when**  
 10 **you were being questioned by Ms. Hayes, you said that he**  
 11 **shuts down when you try to ask him about his father over**  
 12 **the last several months. You said that, didn't you?**  
 13 A Yes. If it's in the records. I don't recall  
 14 it specifically, but, yes.  
 15 **Q But you didn't have any physical concerns**  
 16 **about him in the father's care?**  
 17 A No.  
 18 **Q And you were asked "Do you have concerns about**  
 19 **the father having unsupervised access?" You stated**  
 20 **"Yes," didn't you?**  
 21 A I don't recall. But if it's in the record,  
 22 yes, then I said that.  
 23 **Q And you said "What are the basis of your**  
 24 **concern? Hearing negative things about the mother."**  
 25 **Now, do you believe -- can you tell this**

76

1 **Court and jury that's going to be sitting there that you**  
 2 **think they don't say negative things about Crockett, III**  
 3 **in that home?**  
 4 A I -- I can't -- I don't know what they say in  
 5 their home.  
 6 **Q Now, she also asked you "Have you felt**  
 7 **threatened in this case?"**  
 8 "Yes."  
 9 "Can you tell the Court why?"  
 10 "Well, in certain interactions when I  
 11 don't agree or whenever he wanted me to email  
 12 something, he would become frustrated. His voice would  
 13 become strained and his emails would become more  
 14 aggressive than I'm used to when working with parents."  
 15 **Now, Dr. Ritzi, you're a grown woman.**  
 16 **How old are you?**  
 17 A I'm 48.  
 18 **Q And you have a Ph.D.?**  
 19 A Yes.  
 20 **Q And somebody -- if their emails are more**  
 21 **aggressive than you're used to when dealing with**  
 22 **parents, that puts you in fear?**  
 23 A In this situation, yes.  
 24 **Q And you -- Ms. Hayes was asking you about a**  
 25 **toxic relationship between the father and child. And --**

77

1 **by Ms. Hayes:**  
 2 "You've indicated you have concerns about  
 3 the father having unsupervised contact with the child.  
 4 Can you tell the judge why? If it's just an emotional  
 5 and psychological, can you tell the judge why you're  
 6 afraid?"  
 7 **And you did. You said, "The child is**  
 8 **scared of his father being displeased with him."**  
 9 **Well, that's not being physically afraid**  
 10 **of the father, is it?**  
 11 A No.  
 12 **Q And you were asked -- you were asked "As an**  
 13 **expert, do you believe that impairs the emotional**  
 14 **development?" Do you recall what you said?**  
 15 A Not off the top of my head.  
 16 **Q You stated "Yes." It's on page 19, line 25.**  
 17 **And then she asked you, "Has the child ever made any**  
 18 **allegations of physical abuse because of his father?"**  
 19 "No."  
 20 **"Have you ever asked the child about**  
 21 **physical abuse by his father?"**  
 22 "Yes."  
 23 **Now, that would have been when he was**  
 24 **brought to you for you to extract or massage information**  
 25 **out of him on April the 23rd, wouldn't it, 2019?**

78

1 A I don't recall specifically what was --

2 **Q Well, that was when you questioned him about**

3 **physical abuse, didn't you?**

4 A I don't believe I questioned him. I

5 believe -- I -- I don't remember exactly what I had

6 asked him and he -- he told me --

7 **Q What was he there for?**

8 A I can look at the note again.

9 MS. CLEMENT: Can you give us --

10 MS. MCKNIGHT: We'll move on. We'll move

11 on. Just please not that -- don't raise your voice.

12 **Q Now, you admitted --**

13 MS. MCKNIGHT: And let the -- let --

14 well, the record does reflect that counsel finds this --

15 counsel for Ms. Ritzi finds this to be very amusing.

16 **Q Dr. Ritzi, now, you did agree back in January**

17 **that -- after the August 9th hearing, the child**

18 **filing -- the child was very upset and his whole world**

19 **had turned upside down, hadn't it? You stated yes then.**

20 **Has your answer changed?**

21 A Can you give me a little bit more context? I

22 remember getting -- I think I remember --

23 **Q The question was -- you don't have to**

24 **remember. I'm looking at page 21.**

25 A Do I have what you're looking at?

79

1 **Q I don't know if you would or not, but I've got**

2 **your sworn testimony in court. And you stated -- I**

3 **asked you, "The child was very upset?"**

4 "Yes. He -- yes, that --

5 "His whole world, his whole world had

6 turned upside down?"

7 You said, "Yes."

8 "He was taken out of the school he had

9 attended for four years?"

10 "Yes."

11 "And he was taken away from his father,

12 whom you acknowledge he loves?"

13 "Yes."

14 "You haven't actually seen them together,

15 have you?"

16 And you said that you had, but you have

17 not evaluated them together, have you?

18 A No.

19 **Q Have you had any sessions, any professional**

20 **sessions, where you've watched this father and son**

21 **together?**

22 A No.

23 **Q Have you had any sessions where you have**

24 **watched the mother and son together?**

25 A No.

80

1 **Q Now, do you think that it was important for**

2 **you, since you had made the statement there in court in**

3 **August 2019 before the judge about Mr. Crockett having**

4 **been seen at your office, that you owed it to the Court**

5 **to clear that up?**

6 A I'm -- I'm -- can you -- can you rephrase

7 or -- I'm not understanding the question.

8 **Q Well, you did give the Court information on --**

9 **in August 2019 that Mr. Crockett had been seen at your**

10 **office there without an appointment. And this is an**

11 **atmosphere when all -- everybody was in fear of**

12 **Mr. Crockett, wasn't it?**

13 A If I remember correctly, yes.

14 **Q And when you learned later that he -- he told**

15 **you he wasn't there, he asked for a chance to clear it**

16 **up, and this was -- you didn't even say when -- when he**

17 **was accused of doing it until this hearing in January,**

18 **did you?**

19 A I'm sorry, I'm having a hard time following

20 your question.

21 **Q I'll be glad to repeat it, Dr. Ritzi.**

22 MS. CLEMENT: Just a second. She wants

23 to speak with her attorney.

24 (Witness and counsel conferred.)

25 MS. MCKNIGHT: Please do it quietly.

81

1 MS. HAYES: Hey, Mary, I know they're

2 visiting, but is there any chance we could take, like, a

3 three-minute restroom break?

4 MS. MCKNIGHT: Yes.

5 MS. HAYES: Okay. Great. I'll be back.

6 VIDEOGRAPHER: Off the record at 3:18.

7 (A break was taken from 3:18 p.m. to 3:26 p.m.)

8 VIDEOGRAPHER: Back on the record at 3:26

9 p.m.

10 **Q All right. Dr. Ritzi, you recall that you**

11 **were given a hypothetical back on January the 15th,**

12 **"Assuming that the mother has stated she wants the child**

13 **out of the father's life," this is a hypothetical, "that**

14 **when she -- he filed to modify back in 2018, she decided**

15 **the father should be excluded by any means necessary,**

16 **would you consider that a healthy relationship?" And**

17 **you said, "That would not be healthy."**

18 **Do you still feel that would not be a**

19 **healthy relationship?**

20 A Well, there's -- I would say I think it's

21 important for children to have as many people in their

22 lives that love them, and so I think there's a lot of --

23 there's other things that can go with -- like, if

24 there's more details to that hypothetical because there

25 could be [audio distortion].

82

1           **Q** Let me ask you this: Have you seen any  
 2 **evidence that Nikki Ngo wants this father to be a part**  
 3 **of her child's life?**  
 4           A Yes.  
 5           **Q** Tell the Court what it is.  
 6           A In times in which she and I have talked about  
 7 I think it's important for the child to have connection  
 8 with both parents and --  
 9           **Q** That's you talking. What connection has she  
 10 **allowed? At Hannah's House, she did not want him to**  
 11 **take pictures, did not want any pictures to be shown to**  
 12 **the child, no phone calls, no money given to him, no**  
 13 **games on video, nothing. Now --**  
 14           MS. HAYES: Objection to form.  
 15           Hey --  
 16           MS. CLEMENT: Objection --  
 17           MS. HAYES: -- can you refer me to an  
 18 exhibit, Mary? I can't hear you.  
 19           MS. MCKNIGHT: I'm not saying anything.  
 20 I'm waiting till the screeching stops.  
 21           MS. HAYES: Can you -- are you referring  
 22 to one of your exhibits?  
 23           MS. MCKNIGHT: I was.  
 24           MS. HAYES: Okay. Can you tell me a  
 25 number?

83

1           MS. MCKNIGHT: It's the Hannah's House --  
 2 I don't see the number on there.  
 3           MS. HAYES: Okay.  
 4           MS. MCKNIGHT: I'll ask a different  
 5 question.  
 6           **Q** Now, do you -- now, you know that she wrote  
 7 **you wanting him to leave Hannah's House and wanted to go**  
 8 **back to FLP; is that right?**  
 9           A I recall an email to that. I just don't --  
 10 I don't remember exactly which email.  
 11           **Q** She wasn't happy [audio distortion] Hannah's  
 12 **House. She didn't want him to have four hours a week at**  
 13 **Hannah's House, did she?**  
 14           A She didn't -- she was worried -- she -- she  
 15 shared with me that she was worried about the -- the  
 16 length of time.  
 17           **Q** The length of time. Four hours a week she was  
 18 **worried about, right?**  
 19           A Oh, I -- I misunderstood your question. In --  
 20 from what she shared with me, she was worried about the  
 21 length of time in one setting.  
 22           **Q** That what?  
 23           A It would be in one setting, like four hours  
 24 straight or three hours -- it was something --  
 25           **Q** [Audio distortion] told you it was four hours

84

1 **straight?**  
 2           A I don't recall. I don't have the -- I just  
 3 remember --  
 4           **Q** She said -- I don't mean to talk over you but  
 5 **you said she was worried about the length of time. He**  
 6 **had four hours per week; two on Thursday nights --**  
 7 **evening 5:00 to 7:00 and two hours on Saturday. And she**  
 8 **felt that was too much time for a father to be with his**  
 9 **son; is that right?**  
 10           A I don't recall her saying that was too much  
 11 time regarding those -- that -- those hours.  
 12           **Q** And she wanted -- she wanted him out of  
 13 **Hannah's House, she didn't want him to be able to see**  
 14 **him there; is that right?**  
 15           A I -- there was -- she -- she -- I remember her  
 16 talking about that she was not satisfied with Hannah's  
 17 House.  
 18           **Q** And do you recall Mr. Crockett making a  
 19 **complaint at Hannah's House?**  
 20           A I -- I don't know of one.  
 21           **Q** Who's been parenting this child for the last  
 22 **few months, Ms. Ritzi? Has it been Nikki Ngo or Rob**  
 23 **Cottingham?**  
 24           A I don't know what happens in -- in their home.  
 25           **Q** Well, do you talk about it with him, with the

85

1 **child?**  
 2           A I talk about what he wants to talk about and  
 3 he has -- he talks about both of them.  
 4           **Q** Well, you pressed him on my client. Every --  
 5 **almost every session you would ask him about his father**  
 6 **and he would not want to talk to you about it.**  
 7           MS. CLEMENT: Objection to form.  
 8           **Q** Do you acknowledge that, Dr. Ritzi?  
 9           A I would ask him how is his time with his  
 10 father.  
 11           **Q** And he would say -- and, just for the record,  
 12 **if --**  
 13           MS. MCKNIGHT: Counsel, we can hear you  
 14 say objection to form. You do not have to put your full  
 15 face in the camera. Anyway . . .  
 16           MS. CLEMENT: Thank you. I'm not -- I  
 17 don't think we've really gotten guidelines for Zoom  
 18 depositions, so . . .  
 19           MS. MCKNIGHT: We'll be getting them,  
 20 but, believe me, it's not something that we need here.  
 21           MS. CLEMENT: Well, I -- you know, I'm  
 22 not really sure that Mary McKnight is deciding what we  
 23 need here, so . . .  
 24           MS. MCKNIGHT: Well, we're going on with  
 25 the deposition. If you will remove your face.

86

1 MS. CLEMENT: [Audio distortion].

2 **Q Now, what has -- what has -- what arrangements**

3 **has Nikki Ngo made, what has she agreed to for Lauriston**

4 **Crockett, III to be with his son since Betty died?**

5 **Betty Stone at Hannah's House.**

6 MS. HAYES: Objection to form.

7 A I don't know.

8 **Q Are you aware if he's even seeing his son?**

9 A I know -- I don't know when the last time, the

10 actual date, and I know he hadn't seen him for a while

11 because of -- the -- the owner of Hannah's House had

12 died and they were --

13 **Q Have you talked to Vickie Alexander yourself?**

14 A I spoke with Vickie Alexander briefly. I

15 don't remember the exact date.

16 **Q How long ago?**

17 A I'd have to look at my notes. Couple of

18 weeks.

19 **Q Was it weeks ago, months ago, days ago?**

20 A Weeks. Couple of weeks.

21 **Q All right. And what was -- what was the --**

22 **the occasion? What was the discussion?**

23 A That they had not set up the -- they were

24 trying to set it up at FLP and that Vickie said she had

25 offered to see Logan outside of FLP, and had he -- had

87

1 Logan talked about that with me. Like, if they -- if

2 that would be something that Logan has -- had mentioned

3 to me.

4 **Q Well, did you talk to Logan about it or did**

5 **Vickie talk to Logan about it?**

6 A I don't know what Vickie talked [audio

7 distortion] --

8 **Q -- clear that -- in your notes that Vickie --**

9 **in those notes that you were talking about from your**

10 **May 28th session that Vickie Alexander had talked to him**

11 **and that he did not want to have a picnic with his dad**

12 **because he was afraid of him?**

13 A I quoted him.

14 **Q Pardon?**

15 A I quoted the child.

16 **Q Now, Ms. Ritzi, when you're writing things**

17 **down, you don't record them, you don't have a recording**

18 **of any of this, do you?**

19 A No.

20 **Q Or a video. It's you putting down what you**

21 **say the child said?**

22 A Yes.

23 **Q Did this child tell Vickie Alexander that he**

24 **did not want -- that he was afraid of his dad and did**

25 **not want to have dinner with him?**

88

1 A I can only write down what the child told me

2 he said.

3 **Q Did you call Vickie Alexander and verify that?**

4 A No.

5 **Q Did Vickie Alexander send you anything in**

6 **writing that verified that this child did not even want**

7 **to see his father?**

8 A No.

9 **Q Yes or no?**

10 A I said no.

11 **Q And you think this child has been damaged by**

12 **this whole ordeal, Ms. Ritzi?**

13 A I don't -- damaged is a -- is a strong word.

14 I . . .

15 **Q Well, you -- you stated before that you felt**

16 **he had?**

17 A I think that he's -- that a child who doesn't

18 have -- that's -- that feels caught in the middle, it

19 can be detrimental to a child.

20 **Q Is it in your notes, and I won't burden our**

21 **record or time going into them, over and over the child**

22 **tells you if he could have anything he wants, he would**

23 **want his parents to be friends again, doesn't he?**

24 A He's said that on a few occasions.

25 **Q At least four or five that you've written**

89

1 **down, hasn't he?**

2 A I don't know the number, but I know he's --

3 he's stated that.

4 **Q Even recently he said that, if he could have**

5 **any wish, it would be for his parents to have -- to be**

6 **friends again?**

7 A Yes.

8 **Q And Mr. Cottingham has written you and told**

9 **you and complained that Mr. Crockett parked so as to**

10 **harass him, didn't he?**

11 A Yes. He sent me an email regarding an

12 incident that they had.

13 **Q And he said that he parked to harass him and**

14 **that he was in fear of his life, didn't he? Do you**

15 **remember that?**

16 A I -- I -- I don't remember de- -- the specific

17 wording, but I recall the email.

18 **Q And do you believe that Mr. Cottingham**

19 **supports the relationship between Lauriston Crockett and**

20 **his son?**

21 A I -- I can't speak to that.

22 **Q Well, Dr. Ritzi, you spent a great deal of**

23 **time and effort trying to facilitate Mr. Crockett being**

24 **able to participate in Lauriston's hockey, didn't you?**

25 A Can you repeat the question?



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1       **Q 2018.**  
 2       A    Could you repeat the question?  
 3       **Q    You spent a lot of time and effort trying to**  
 4       **facilitate Lauriston Crockett being able to participate**  
 5       **in his son's hockey, didn't you?**  
 6       A    I tried to help the parents come to an  
 7       agreement that they can both attend the child's practice  
 8       at the same time. Or at least go to practice [audio  
 9       distortion].  
 10       **Q    And what Mr. Crockett, not the mother, it was**  
 11       **Mr. Crockett wrote to you saying "After much**  
 12       **deliberation" -- and it's one of our exhibits here.**  
 13       **I'll find it. "After much deliberation, we have -- we**  
 14       **have decided that we do not want Mr. Crockett to come to**  
 15       **any of the hockey events," didn't he?**  
 16       A    I -- I recall that email.  
 17       **Q    And that was after you had been -- they had**  
 18       **been telling you that Crockett wouldn't come and**  
 19       **Crockett wouldn't cooperate, and then when you set it up**  
 20       **said, "We don't want him there," didn't they?**  
 21             MS. HAYES: Objection to form.  
 22       **Q    Didn't they?**  
 23       A    I don't recall exact order. Both sides backed  
 24       out, actually.  
 25       **Q    Both sides? How did Mr. Crockett back out?**

91

1             MS. CLEMENT: Please allow her to finish  
 2       the question.  
 3       A    From what I recall, he, Mr. Crockett, told me  
 4       that he decided that he didn't want to go so that way he  
 5       didn't cause any stress on -- on the child.  
 6       **Q    Well, do you recall any incident where**  
 7       **Mr. Cottingham stirred up some stress with Mr. Crockett**  
 8       **there when he attempted to attend?**  
 9       A    I wasn't there. I know that there was --  
 10       there was several things going on between them that they  
 11       were both reporting -- or all three of them were  
 12       reporting difficulty attending his practices.  
 13       **Q    Here we are, Deposition Exhibit 41, where he**  
 14       **says "Today Mr. Crockett parked in front of the door**  
 15       **even though there were no cars parked along the street."**  
 16       MS. CLEMENT: Can you give --  
 17       **Q    And he parked in a different spot --**  
 18       MS. CLEMENT: -- us a minute to find it,  
 19       please? We can't find it yet. Can you give us a  
 20       minute, please, to find the exhibit?  
 21       MS. MCKNIGHT: Oh, here we are.  
 22       MS. CLEMENT: Okay. We're back.  
 23       **Q    Okay. What was the last one we were talking**  
 24       **about?**  
 25       THE REPORTER: Exhibit 41.

92

1             MS. MCKNIGHT: Yes. Here we are.  
 2       **Q    Now, you responded -- you responded to Mr. --**  
 3       **even though you were either on vacation or about to**  
 4       **leave for vacation, you responded to Mr. Cottingham,**  
 5       **didn't you?**  
 6       A    Yes.  
 7       **Q    And Mr. Cottingham had told you he parked in a**  
 8       **different spot so he could harass him, didn't he?**  
 9       A    That's what the letter -- the email states.  
 10       **Q    And then he claimed that Mr. Crockett said to**  
 11       **him, he said -- he said that he was afraid for his life,**  
 12       **but he said, "He parked there so he could harass me.**  
 13       **When I opened the door, he shouted 'Keep smiling you**  
 14       **fucking liar.'" And "I went back immediately inside**  
 15       **because I'm in fear of this person." Do you see that?**  
 16       A    Yes.  
 17       **Q    Well, if he was in fear of him and, as he says**  
 18       **on the next page, fear of his life, why would he be**  
 19       **smiling at him?**  
 20       A    I don't know.  
 21       **Q    "Keep smiling you fucking liar," and he**  
 22       **misspelled liar.**  
 23             MS. HAYES: Objection to form.  
 24       **Q    Did it make sense to you why he would be**  
 25       **smiling at him if he is so in fear?**

93

1       A    I'm not assessing for what's happening for --  
 2       **Q    Why were you -- why were you playing along**  
 3       **with this, Dr. Ritzi?**  
 4             MS. HAYES: Objection to form.  
 5       A    I don't believe I was playing along; I was  
 6       trying to help the parents to --  
 7       **Q    Help which parent?**  
 8       A    All of -- in this case, it would have --  
 9       **Q    How were you trying to help Mr. Crockett?**  
 10       MS. CLEMENT: Please allow her to finish  
 11       the ques- -- finish the answer.  
 12       A    After this -- I'm sorry?  
 13       **Q    How were you trying to help Mr. Crockett?**  
 14       A    I was trying to help the child to not feel  
 15       caught in the middle and be protected from being caught  
 16       in the middle.  
 17       **Q    And how do you achieve that?**  
 18       A    Have --  
 19       **Q    You haven't so far, have you?**  
 20       A    I don't know. I don't know what happens  
 21       outside of my presence.  
 22       **Q    And you certainly don't, do you?**  
 23       A    No.  
 24       **Q    You don't know what they say or do to that**  
 25       **little boy once they get him there in that third floor**

94

1 apartment, do you?

2 MS. HAYES: Objection to form.

3 A I don't know what happens when he's outside of

4 my office.

5 **Q Well, you know there is a long history of**

6 **hatred and hostility, the mother against the father,**

7 **don't you?**

8 A Yes, there's been a lot of hostility and --

9 among this -- all of the parties.

10 **Q And Mr. Cottingham came along and just fanned**

11 **the flames, didn't he?**

12 A I don't know how to answer that -- that

13 question.

14 **Q [Audio distortion] can be antagonistic toward**

15 **Mr. Crockett?**

16 A I don't know. I wasn't there.

17 **Q Well, what is your sense of it? You've been**

18 **working with this child for two years. Do you have a**

19 **sense of whether Mr. Cottingham is antagonistic toward**

20 **the child's father?**

21 A I -- I don't know. My -- my -- that's not in

22 my role.

23 **Q Well, do you step out of your role, Dr. Ritzi?**

24 A I'm -- I don't understand the question.

25 **Q Well, now, you've certainly become just almost**

95

1 **daily pen pals with Crockett -- with Cottingham and**

2 **Nikki Ngo, haven't you?**

3 MS. HAYES: Objection to form.

4 A That was --

5 **Q Go ahead. That was what?**

6 A That was -- in the beginning, everyone was --

7 all parties -- well, definitely Mr. Crockett and Ms. Ngo

8 were sending me lots of emails, and I would reply when

9 I felt like I could be helpful in helping them parent

10 their child.

11 **Q There's a big difference in your replies,**

12 **wasn't there, Dr. Ritzi?**

13 A I don't think so.

14 **Q Well, the jury will see them and you -- have**

15 **you written any -- can you recall any that you wrote**

16 **admonishing Nikki Ngo and Mr. Cottingham not to use you**

17 **to build a case?**

18 A Yes. I mean, I -- I know I said it and I

19 imagine that it's in my emails someplace because

20 I've -- I've told both of them.

21 **Q Well, I will tell you, you may have told them**

22 **but I have scoured your emails, believe me, and I see**

23 **nothing. In fact, you were sending HIPAA releases to**

24 **their lawyers. And how did you respond? Did you**

25 **feel -- when you received that email, copied on it**

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1 **from Mr. Whiddon on April 22nd, did you feel it was**

2 **appropriate for you to respond to an email suggesting**

3 **that you message or extract information from a child?**

4 MS. HAYES: Objection to form.

5 MS. CLEMENT: What exhibit number is that

6 you're referring to? I don't remember.

7 MS. HAYES: I believe it's 1.

8 MS. CLEMENT: 1? Okay. Thank you.

9 MS. HAYES: I could be wrong.

10 MS. MCKNIGHT: It's 1.

11 MS. HAYES: Okay.

12 MS. CLEMENT: All right. Thank you for

13 giving us a minute.

14 A Can you reask the question? Sorry.

15 **Q The question was, did you feel that it was**

16 **inappropriate in any way for you as the child's**

17 **therapist to respond to that suggestion that you message**

18 **or extract information from your eight-year-old client?**

19 A I don't believe I was responding to that

20 suggestion.

21 **Q Well, you made an appointment that same day**

22 **and you questioned him, didn't you?**

23 A I -- they asked me to -- that my [audio

24 distortion] --

25 MS. MCKNIGHT: Objection, nonresponsive.

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1 **Q Dr. Ritzi, did you make an appointment that**

2 **same day after receiving that email around**

3 **11:00 o'clock that morning?**

4 A I don't recall the exact time, but I did make

5 an appointment and I did see the child.

6 **Q The same day. And did you question the child?**

7 A I asked the --

8 **Q Did you question him?**

9 A I asked him some questions, yes.

10 **Q And you asked him about the events that he'd**

11 **been questioned about the night before, didn't you?**

12 A I don't know what was exactly asked the night

13 before. I asked if he knew -- can I -- can I look at my

14 note?

15 MS. CLEMENT: Let me read this. Just a

16 second.

17 Okay. Thank you for the minute.

18 **Q And the question was, do you feel as the**

19 **therapist for this eight-year-old child that it was --**

20 **that you responded appropriately to Mr. Whiddon's**

21 **email asking you to extract or message information out**

22 **of him?**

23 A I did not -- I do not feel I was responding to

24 whatever the -- Mr. Whiddon's email.

25 **Q Did you feel it was appropriate for you to**

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1 **continue to question him after he -- you knew he had**  
 2 **been questioned the night before?**  
 3 A I don't believe I was questioning him about --  
 4 MS. MCKNIGHT: Objection, nonresponsive.  
 5 MS. CLEMENT: Please let --  
 6 **Q You did question him, didn't you?**  
 7 MS. CLEMENT: Objection. Please let her  
 8 finish her answers.  
 9 MS. MCKNIGHT: Oh, please, please. She  
 10 did finish it and please stop screeching on the -- on  
 11 the record.  
 12 MS. CLEMENT: She didn't finish her  
 13 answer. Perhaps you didn't hear it because you were  
 14 talking over her. I'm sitting right next to her and I  
 15 can hear that she's continuing to answer while you start  
 16 to ask your question.  
 17 MS. MCKNIGHT: You are continuing to  
 18 blither. Please let your client talk.  
 19 MS. CLEMENT: That's what I would like to  
 20 have happen, so please do not talk over her answers.  
 21 MS. MCKNIGHT: And you be quiet and go by  
 22 the rules. Your conduct is sanctionable.  
 23 A Could you repeat the question?  
 24 **Q No.**  
 25 A Okay. I can't -- so much has happened between

99

1 them, I'm not sure --  
 2 **Q No, your attorney has interrupted the whole**  
 3 **flow, and what I heard you say was you did not feel that**  
 4 **you did anything inappropriate as the court-appointed**  
 5 **therapist for a young child in responding and**  
 6 **questioning him again on April the 23rd at 5:30 p.m.**  
 7 A I don't feel like I did anything  
 8 inappropriate.  
 9 **Q And you would do the same thing all over**  
 10 **again?**  
 11 A If I had the information that I had up to that  
 12 point, yes.  
 13 **Q And when you had admitted back in January of**  
 14 **this year that you had no reason to believe Mr. Crockett**  
 15 **was a physical threat to this child, why did you -- were**  
 16 **you just catering or pandering to Mr. Whiddon's demand?**  
 17 A I wasn't replying to Mr. Whiddon.  
 18 MS. HAYES: Objection to form.  
 19 **Q But you did what he asked, didn't you?**  
 20 A I was --  
 21 MS. HAYES: Objection to form.  
 22 **Q You did what he asked, didn't you, sir? I**  
 23 **mean --**  
 24 A I don't know what he asked. I -- I -- the --  
 25 the mother asked for an appointment and I scheduled the

100

1 appointment.  
 2 **Q Now, are you familiar with the mother's**  
 3 **diagnoses?**  
 4 A No.  
 5 **Q You've been told the father has all kinds of**  
 6 **diagnoses, haven't you?**  
 7 **What have you been told about the father**  
 8 **by the mother or Mr. Cottingham?**  
 9 A I don't recall.  
 10 **Q Well, have you been told that he has**  
 11 **agoraphobia?**  
 12 A I -- I recall that being mentioned to me in  
 13 the beginning.  
 14 **Q And that he's a conman?**  
 15 A I recall that being in emails.  
 16 **Q And that his mother can't wait to see him burn**  
 17 **in hell and then Logan's name can be Logan Ngo?**  
 18 MS. HAYES: Objection to form.  
 19 A I don't recall that.  
 20 **Q And that the father has wild judgments against**  
 21 **him in multiple lawsuits?**  
 22 A I don't recall that.  
 23 **Q Did either Mr. Cottingham or Nikki ever**  
 24 **forward you any verification of any of the allegations**  
 25 **that they had made against Mr. Crockett?**

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1 A What allegations are you referring to?  
 2 **Q The ones we just discussed. They show you any**  
 3 **diagnosis from anybody of any mental illnesses that he**  
 4 **has, like Munchausen's by proxy or agoraphobia or a**  
 5 **narcissistic personality disorder?**  
 6 A I've not been shown any documentation that  
 7 says --  
 8 **Q [Audio distortion] from anybody?**  
 9 A I'm sorry?  
 10 **Q Did they show you any diagnosis from any**  
 11 **professional?**  
 12 A I don't recall.  
 13 **Q Well, do you believe that Mr. Cottingham is**  
 14 **truthful?**  
 15 A I don't -- I don't know how to answer the  
 16 question. Do I believe he's truthful, Rob Cottingham's  
 17 truthful?  
 18 **Q Yes.**  
 19 A I don't know if it's my -- I mean, I don't  
 20 know.  
 21 **Q Well, Dr. Ritzi, when you get down to it,**  
 22 **truth does matter, doesn't it?**  
 23 A It -- it does. I just feel like everyone has  
 24 their own perspective.  
 25 **Q Alternate facts, Dr. Ritzi? Alternative**

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1 facts.

2 **Dr. Ritzi, now, you stated in your**

3 **testimony that you would not let the parties discuss**

4 **whether or not Mr. Cottingham or Mr. Crockett pulled her**

5 **out of a car and ran over her in 2013; is that right?**

6 A I'm sorry, could you ask that again?

7 **Q You said that you would not let them discuss**

8 **whether or not Mr. Crockett was guilty of pulling her**

9 **out of a car and causing her to be run over in 2013; is**

10 **that right?**

11 A I asked both parties to not -- not -- that was

12 being litigated and I asked both parties to leave me out

13 of that.

14 **Q Well, Dr. Ritzi, you think -- now, you think**

15 **it's important -- you said you've seen Dr. Boelter's**

16 **report that says that she disassociates, Ms. Nikki Ngo**

17 **disassociates because she is so in fear of Mr. Crockett.**

18 **Have you seen that?**

19 A I -- I don't recall. I don't know if it's

20 someone to share -- I don't recall.

21 **Q Well, if she is so in fear of Mr. Crockett**

22 **that she disassociates, isn't it kind of important**

23 **whether that's based on reality or a mental disorder?**

24 A I'm not there to assess the mom. I don't -- I

25 don't have any -- anything to assess the mom on. I'm

103

1 not sure --

2 **Q But --**

3 A -- I'm following your question.

4 **Q -- nobody's been assessing the dad.**

5 **Now, you did receive and you have in your**

6 **file two polygraph exams that he took and passed**

7 **voluntarily, don't you?**

8 MS. CLEMENT: Okay. Hold on just a

9 second. I need to discuss --

10 **Q Do you not, Dr. Ritzi?**

11 MS. CLEMENT: Excuse me. I'm going to

12 talk with my client.

13 (Witness and counsel confer.)

14 MS. CLEMENT: Thank you.

15 **Q Dr. Ritzi, you did receive copies of the two**

16 **polygraphs that he took with Eric Holden on issues of**

17 **whether or not he had anything to do with her car**

18 **accident in 2013 and whether he had abused her or not**

19 **ever, didn't you?**

20 A Somebody -- somebody emailed that to me.

21 **Q Did you read them?**

22 A Yes.

23 **Q Well, have you seen any polygraph exam or**

24 **anything verifying Ms. Ngo's version of the story, that**

25 **she has recovered her memory in 2018 and he pulled her**

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1 **out of a moving vehicle and caused her to be run over**

2 **and then jumped in the car and stopped it? Has anybody**

3 **verified that version for you?**

4 A I'm unsure of the question.

5 **Q Did you receive any police reports or anything**

6 **that -- that supports Ms. Ngo's story?**

7 A No.

8 **Q Have you talked to Dr. Boelter?**

9 A No.

10 **Q Do you know if she's still seeing Dr. Boelter?**

11 A I don't know.

12 **Q Have you -- have you questioned it?**

13 A Have I questioned . . .

14 **Q Whether or not she is getting counseling.**

15 A No, I haven't questioned her if she's

16 receiving counseling.

17 **Q Now, if she is so in fear of Mr. Crockett that**

18 **she disassociates when he is mentioned or around, that**

19 **is not a healthy situation for this young child, is it?**

20 A I don't feel like I can assess the mom.

21 **Q Well, I'm just asking you to look at facts,**

22 **either -- if he did pull her out of the car and run over**

23 **her, it's important whether that is a fact or a fantasy,**

24 **isn't it, in how this boy reacts to his mother**

25 **disassociating when she's confronted with even talking**

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1 **about the father?**

2 A I'm sorry, was [audio distortion] --

3 **Q I'll rephrase that.**

4 **How in the world could you provide**

5 **meaningful therapy to this child and not address that**

6 **issue, Dr. Ritzi; the issue of whether or not the father**

7 **is a monster who tried to kill the mother or the mother**

8 **is either delusional or deliberately lying? Those are**

9 **the three options.**

10 A I -- I don't question -- that's not how

11 therapy works with a child -- how I conduct therapy with

12 a child.

13 **Q Well, how far -- how is it working for you so**

14 **far? How's the kid doing?**

15 A You are asking for his progress up to now

16 or -- I need a more specific question, I guess.

17 **Q The child is still very, very anxious, isn't**

18 **he?**

19 A He -- he has not been as anxious recently.

20 **Q And you've always said that. Ever since**

21 **you -- every report I've seen, you've said, "Oh, his**

22 **anxiety is doing much better," and then you're trying to**

23 **soothe him and get him able to sleep alone at nine years**

24 **old. Does he sleep alone all night now?**

25 A I don't know.

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1       **Q** Well, isn't that one of the things you're  
 2 **working on?**  
 3       A Yes.  
 4       **Q** A nine-year-old, a very smart nine-year-old  
 5 **who is perceptive, who is intelligent can't sleep alone**  
 6 **without being self-soothed or having his mother go to**  
 7 **bed with him. Now, that's problematic, isn't it?**  
 8       A I would like for a child to be able to --  
 9       **Q** Is that problematic or not? Not what you  
 10 **would like. Is that problematic?**  
 11       A There are other --  
 12       **Q** Is it problematic, Dr. Ritzi?  
 13       A If there's other problems going on, that may  
 14 be the lesser of my concern.  
 15       **Q** I can't -- I can't hear you.  
 16       A It's hard for me to answer that question  
 17 because if there are other factors happening, that may  
 18 be the lesser of my concern.  
 19       **Q** Okay. And what other factors; like the father  
 20 **and the stepfather -- the mother and the stepfather hate**  
 21 **the father and want him out of the child's life?**  
 22       MS. HAYES: Objection to form.  
 23       **Q** Would that be a concerning factor?  
 24       A It's a concerning factor that -- if anyone is  
 25 putting the child in the middle.

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1       **Q** Well, and you think this child hasn't been put  
 2 **in the middle and kept in the middle?**  
 3       A There are times in which he has been -- a lot  
 4 of times he's been caught in the middle.  
 5       **Q** Well, like, from the day he was born?  
 6       MS. HAYES: Objection, form.  
 7       A I'm not able to -- I don't know how to answer  
 8 that question.  
 9       **Q** Now, you know that -- did Nikki tell you --  
 10 **did Nikki Ngo ever tell you that she wanted**  
 11 **Mr. Cottingham to adopt her son?**  
 12       A I don't recall.  
 13       **Q** Well, isn't that something you would remember?  
 14       A This is -- not necessarily. This is such a  
 15 large case with so much information, I don't know what I  
 16 would and wouldn't remember.  
 17       **Q** Well, have you read Nikki Ngo's deposition?  
 18       A No.  
 19       **Q** Are you -- did she tell you numerous times  
 20 **that she was sleeping in the bunk bed with her son and**  
 21 **that she -- and that you said, "That's all right. It's**  
 22 **fine"?**  
 23       A I don't recall that.  
 24       **Q** And that she wants Mr. Crockett -- she wants  
 25 **Mr. Cottingham to adopt the child when something happens**

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1       **to Mr. Crockett. Is that a healthy attitude?**  
 2       A I'm not sure of the question.  
 3       **Q** If Mrs. Ngo in her sworn deposition has said  
 4 **that it would be good for Mr. Cottingham to adopt**  
 5 **Lauriston, IV when something happens to Mr. Crockett, is**  
 6 **that a healthy attitude?**  
 7       A I think -- no. I'm still confused by the --  
 8 the question. I don't think it's a healthy attitude for  
 9 a child not to have as many people in their life that  
 10 love him.  
 11       **Q** Well, what avenue do you see -- if Ms. Ngo is  
 12 **allowed to continue as she is now, what avenue do you**  
 13 **see for this father having time with his son?**  
 14       A That's not in my -- that's not in -- in --  
 15 that's not in my --  
 16       MS. CLEMENT: Role.  
 17       A That's not in my role to -- to say.  
 18       **Q** But you on the record here recommended  
 19 **supervision, didn't you?**  
 20       A I answered -- I don't recall recommending --  
 21       **Q** Look at it again.  
 22       THE REPORTER: Kris, did you object just  
 23 then?  
 24       MS. MCKNIGHT: Do what?  
 25       THE REPORTER: There's nothing coming

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1 through when you're talking.  
 2       MS. MCKNIGHT: Check our --  
 3       MS. FERRELL: That's Kris who's talking.  
 4       MS. MCKNIGHT: Okay.  
 5       MS. HAYES: -- so quickly that I think it  
 6 mutes me when somebody else is talking. Oh, you know  
 7 what? I have a form. Oh. Can you see that? Would  
 8 that help you, Christy?  
 9       THE REPORTER: Well, it won't come  
 10 through on the video, but just when you're -- it's not  
 11 coming through like it was, your audio isn't. It was  
 12 clear, now it's not.  
 13       MS. HAYES: Let me figure out.  
 14       MS. CLEMENT: Do you need to take a  
 15 break?  
 16       THE WITNESS: Yeah.  
 17       MS. CLEMENT: Okay. My client needs to  
 18 take a break for just a minute, make a phone call.  
 19       MS. MCKNIGHT: Go ahead.  
 20       VIDEOGRAPHER: We're off the record at  
 21 4:09 p.m.  
 22       (A break was taken from 4:09 p.m. to 4:15 p.m.)  
 23       VIDEOGRAPHER: Back on the record at  
 24 4:15 p.m.  
 25       **Q** Dr. Ritzi, at any point in time did you

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1 discern that Mr. Cottingham was, in fact, doing the  
 2 communicating with you instead of Ms. Ngo?  
 3 A I'm sorry, could you repeat that? If -- was  
 4 there any time I was concerned?  
 5 Q Did you discern or pick up that it was Rob  
 6 Cottingham doing the writing to you instead of Ms. Ngo?  
 7 A I wasn't assessing for who was --  
 8 Q Well, did you -- did you see the difference in  
 9 the writing style and in the comments?  
 10 A I wasn't assessing for that.  
 11 Q Well, it didn't even occur to you or you  
 12 didn't notice it?  
 13 A I didn't notice it.  
 14 Q Well, if he were doing the writing instead of  
 15 her, do you think that would be significant if he had  
 16 taken over?  
 17 A I'm not sure I'm understanding the question.  
 18 I don't -- not necessarily, if he was sending me a text  
 19 versus if she was sending me a text or email.  
 20 Q Well, if he were composing it and writing it  
 21 for a -- she -- there's one letter that he -- she wrote  
 22 to you saying that "Rob said that" -- they were making  
 23 fun, basically, of Mr. Cotting- -- Mr. Crockett saying  
 24 "Rob noticed that when he says goodbye to Lauriston, he  
 25 sounds like a teenage girl, 13 years old, breaking up

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1 with their first boyfriend."  
 2 Now, did you read that? Do you remember  
 3 reading that?  
 4 A Yes.  
 5 Q All right. Did you find that demeaning?  
 6 A He was -- he wasn't saying it to the child, if  
 7 I remember correctly, so I --  
 8 Q He was saying it to you. And did you admonish  
 9 him in saying that "You are denigrating the father, you  
 10 are ridiculing the father to say he behaves like a  
 11 teenage girl?" And that was Cottingham saying that  
 12 under Nikki's signature, but you remember it, don't you?  
 13 MS. HAYES: Objection to form.  
 14 A I do recall -- I think it was in your  
 15 deposition or -- that I had read that you had put that  
 16 in there, but I don't -- I'm not -- can you repeat the  
 17 question? I'm sorry.  
 18 Q Did you write to Mr. Cottingham or Ms. Ngo and  
 19 say that he was -- they were ridiculing and denigrating  
 20 the father to say he was behaving like a teenage girl  
 21 who was broken up with her first boyfriend?  
 22 A Can you tell me which one -- which --  
 23 Q We can find the letter, but it's going to  
 24 take -- it's there and it's in our [audio distortion]  
 25 exhibits. Now --

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1 A Well, you asked me how I replied, and so I  
 2 need to see it to -- to respond how I replied.  
 3 Q Well, you didn't reply. It was just one of  
 4 those times when they were making fun of Mr. Crockett.  
 5 And Deposition Exhibit 12 was when  
 6 Mr. Crockett tells you -- Mr. Cottingham tells you,  
 7 "After much deliberation, we've decided we do not want  
 8 to encourage Mr. Crockett to attend Logan's hockey  
 9 practice because we've been reminded of our prior  
 10 experience at his soccer and karate."  
 11 Now, that was four years earlier. Did  
 12 you make any note of that?  
 13 A Make any note of -- I'm not sure I'm  
 14 understanding your question.  
 15 Q He said -- he wrote to you, "We did discuss  
 16 this with you when we met in person November 28th, but I  
 17 guess you missed it. After much deliberation, we  
 18 decided we did not want to be -- to encourage  
 19 Mr. Crockett to attend Logan's hockey practices and  
 20 games because we had that -- reminded of our prior  
 21 experiences at Logan's soccer and karate."  
 22 Now, did you realize or did you know that  
 23 the soccer and karate was four years earlier?  
 24 A No. I wasn't attributing -- no, I didn't.  
 25 Q And you had been trying to facilitate

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1 Mr. Crockett participating and then they just, "Huh-uh,  
 2 we don't want it," didn't they, Mr. Cottingham did?  
 3 And in this same letter --  
 4 MS. HAYES: I'm going to object to --  
 5 Q -- talk about parental alienation. In that  
 6 same letter, Deposition Exhibit 12, "Since Mr. Crockett  
 7 seems incapable of telling the truth and cannot control  
 8 his impulses to bash Nikki at every opportunity, we are  
 9 not encouraging Mr. Crockett to become involved any  
 10 longer."  
 11 Now, do you find that alienating?  
 12 A If I remember correctly, I responded -- I told  
 13 them that it was important for both parents to go -- to  
 14 figure out how they would both go to practice.  
 15 Q How did that work out?  
 16 A From what I understood, they shared the hockey  
 17 information with Mr. Crockett and then --  
 18 Q And then they made a big scene at the first  
 19 hockey game he attended and took Lauriston home before  
 20 he could play, didn't they?  
 21 A I don't know. I wasn't there.  
 22 Q Well, you certainly got reports from both  
 23 people, didn't you?  
 24 A I'd have to -- I -- I don't recall. It's  
 25 been --

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1 **Q And you basically became part of their team,**  
 2 **didn't you?**  
 3 MS. HAYES: Objection, form.  
 4 **Q Their legal team, Dr. Ritzi.**  
 5 A No.  
 6 **Q On Deposition Exhibit No. 11, this was**  
 7 **November -- this is December the 3rd, 2019, "I just got**  
 8 **news that his attorney is withdrawing as his counsel,"**  
 9 **and you go, "Oh wow!" Did you think that was a**  
 10 **professional, appropriate response? "Oh wow!"**  
 11 A I don't -- I mean . . .  
 12 **Q Why were you so excited that his attorney was**  
 13 **withdrawing?**  
 14 MS. CLEMENT: Objection --  
 15 A I wasn't excited; I was surprised.  
 16 **Q Well, why did you need to know -- as the**  
 17 **child's counselor, why would it be important for her to**  
 18 **notify you that same day that he was -- his counselor**  
 19 **was withdrawing?**  
 20 A I don't know.  
 21 **Q To me, it would seem that she kind of**  
 22 **considered you part of their legal team --**  
 23 MS. HAYES: Objection to form.  
 24 **Q -- to know everything and the first to**  
 25 **respond, no matter how petty or how denigrating it was**

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1 **for Mr. Crockett. Do you have any emails where you**  
 2 **told them to tone it down or to not insult him?**  
 3 MS. HAYES: Objection to form.  
 4 A Yes.  
 5 **Q Could you direct me to them?**  
 6 A I -- there's a lot of emails. I just -- I  
 7 know when I was reading through emails, I saw them --  
 8 I saw emails in which I was, like, "Do not put the  
 9 child in the middle, don't speak negatively of the  
 10 father." I -- I addressed it to both -- both sides.  
 11 **Q Very clear on the record for this, and I want**  
 12 **you to write it down as well, now, tell me again what**  
 13 **role Vickie Alexander had, if any, in being told that**  
 14 **the child is afraid of his father and didn't want to**  
 15 **have [audio distortion] dinner with him.**  
 16 A I'm sorry, you broke up.  
 17 **Q You did not talk to Vickie, right?**  
 18 A No, I had a phone call.  
 19 **Q You had a phone call with Vickie?**  
 20 A A very brief one.  
 21 **Q And what was said in the phone call?**  
 22 A That -- I need to find my note.  
 23 **Q Go ahead.**  
 24 A I'm still looking for the note. There was --  
 25 I know I had a conversation with her recently, just a

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1 brief conversation, where we talked about -- she said  
 2 that she had offered to -- offered the child to take him  
 3 to see his -- his -- his dad outside of Hannah's House.  
 4 **Q And did she say the child said he didn't want**  
 5 **to? That's what I understood you to say earlier, that**  
 6 **Vickie said the child [audio distortion] --**  
 7 A I'm looking for my note. That's what I  
 8 remember. That's why I'm looking for my note.  
 9 [Reading] "And stated she offered to meet client with  
 10 father in an alternate location. The client preferred  
 11 to wait until [inaudible]. Therapist stated that client  
 12 also shared" --  
 13 THE REPORTER: This is the court  
 14 reporter. If you're going to read, I need you to speak  
 15 where I can hear you or mute, please.  
 16 MS. CLEMENT: Okay. Yeah. Thank you.  
 17 Okay. She found the note.  
 18 **Q All right. Would you please read it into the**  
 19 **record, please, Dr. Ritzi?**  
 20 A Sure. "Brief phone contact with amicus.  
 21 Discussed client's move to new supervised visits  
 22 location. Amicus stated she offered to meet client and  
 23 father in an alternate location but that client reported  
 24 he preferred to wait until FLP visits begin -- or began.  
 25 Therapist stated that client also shared with therapist

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1 that he preferred to only visit his father at FLP."  
 2 **Q Okay. Now, client reported -- read that**  
 3 **again. Client reported that he shared with his**  
 4 **therapist, that would be you, right?**  
 5 A I'm going to read it over because I --  
 6 **Q Read it over again, get this right.**  
 7 A "Brief phone contact with amicus. Discussed  
 8 client's move to new supervised visits location. Amicus  
 9 stated she offered to meet client and father in an  
 10 alternate location but that client reported he preferred  
 11 to wait until FLP visits began. Therapist stated that  
 12 client also shared with therapist that he preferred to  
 13 only visit his father at FLP."  
 14 **Q Now, did he have such a discussion with you,**  
 15 **Dr. Ritzi?**  
 16 A Yes.  
 17 **Q When did he have that discussion with you?**  
 18 **And in what -- what date?**  
 19 A Okay. Could you reask the question? I'm  
 20 sorry.  
 21 **Q Yes. What date did he have the [audio**  
 22 **distortion] client?**  
 23 A You broke up.  
 24 **Q What date did the child have this conversation**  
 25 **with you that he did not want to see his father outside**

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1 **of FLP?**

2 A I don't know. I might be mixing up different

3 sessions. I don't know when he actually said -- I know

4 he said that he wanted to -- when he told me about

5 Hannah's House originally and that he had the session

6 with Vickie, that Vickie was there.

7 **Q That's kind of an important statement by the**

8 **child and I would think you would record it and date it,**

9 **and we do not have the notes of any such session.**

10 A I --

11 MS. HAYES: Objection to form.

12 **Q Pardon?**

13 A I -- there's -- there's an echo.

14 I can only speak to what I put in my

15 notes.

16 **Q And what did you put in your notes, again, and**

17 **what date?**

18 A For which part?

19 **Q We don't have those notes. We do not have**

20 **them.**

21 A I sent them to you.

22 MS. MCKNIGHT: Go get Steve again.

23 **Q What date?**

24 MS. CLEMENT: For what?

25 A For what?

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1 **Q For the notes that you're reading there now.**

2 A The one that I was reading was the -- the 5/28

3 session.

4 **Q And we do not have any notes for that session**

5 **that say anything.**

6 A You don't -- you don't have a copy of this

7 note?

8 **Q No, we do not. We have a question of you**

9 **sending us a bill for your retainer.**

10 A I -- it's -- I -- I don't know what to say

11 about that because it's -- what I see on my side, that

12 was shared with you.

13 **Q Well, we don't have it and --**

14 A I'm -- I don't know.

15 **Q Maybe this was the file that was corrupted**

16 **that we didn't get.**

17 A Yeah, I thought that you found this note

18 earlier. I can give you the name again of it.

19 **Q Okay.**

20 A Name of the note says Progress Note

21 05-29-2020, 12:59 a.m.

22 **Q In other words, it was almost 1:00 in the**

23 **morning?**

24 A [Audio distortion].

25 THE REPORTER: Say that answer again.

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1 You cut out.

2 A I work late hours. I'm a night owl.

3 **Q Well, my dad scares me. But this is what you**

4 **wrote down. There's no -- there's no recording of it?**

5 A That's correct.

6 **Q And you wrote it down on -- let's see, created**

7 **on May the 29th. Now, some of your notes you will**

8 **create them -- you will have the interview or the**

9 **session and maybe a month later you will do the notes.**

10 **Why is that?**

11 A There is -- it's the platform in which I write

12 my notes, I -- after sessions, I write more of a rough

13 draft of the session before I put it into the formal

14 form.

15 **Q And your notes are all electronic; is that**

16 **correct?**

17 A Yes.

18 **Q Do you do any --**

19 A They weren't before.

20 **Q And do you know any reason why Vickie had**

21 **given us this information?**

22 A I'm not sure. What information?

23 MS. HAYES: Objection to form.

24 **Q No. Vickie had a -- had made an appointment**

25 **to have a visit with Lauriston and his son, and she told**

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1 **us, she emailed us, that she was caught in a**

2 **mediation, a Zoom mediation, and could not go that**

3 **night.**

4 MS. HAYES: Objection to form.

5 MS. CLEMENT: And what's the question?

6 **Q Were you aware that Nikki said she was in a**

7 **Zoom mediation and could not supervise that night?**

8 A I'm not -- I'm not sure what you're referring

9 to, I'm sorry.

10 **Q I'm referring to emails that Nikki -- that**

11 **Vickie Alexander sent us canceling the off-site visit**

12 **because she was in a Zoom mediation that went late. She**

13 **did not give us this information. Did you discuss it**

14 **with Vickie?**

15 MS. HAYES: Objection to form.

16 **Q Did you discuss this information with Vickie?**

17 A What information?

18 **Q That the child did not want to -- he had told**

19 **her he did not want to go with his father.**

20 A I'm -- I'm confused. All I can do is tell you

21 what I wrote in my note.

22 **Q When did you have your last phone conversation**

23 **with Vickie?**

24 A Sorry. I'm having to log on, in and out every

25 time.



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1       **Q That's all right. I have one last very**  
 2 **important question.**  
 3       A That was May 27th.  
 4       **Q And did Vickie Alexander tell you that she had**  
 5 **talked to the child and the child told her that he**  
 6 **didn't want to go with his dad?**  
 7       A She -- "client said that he wanted to wait  
 8 until FLP."  
 9       **Q She told you that client said? This is what**  
 10 **Vickie Alexander told you?**  
 11       A That's what's in my notes.  
 12       **Q And that was on May the 27th?**  
 13       A Yes, ma'am.  
 14       **Q At what time?**  
 15       A I have 9:30. And sometimes it's around about.  
 16 I don't --  
 17       **Q 9:30 a.m.?**  
 18       A Yes.  
 19       **Q On May the 27th Vickie Alexander said she had**  
 20 **offered to supervise off-site but the child said he**  
 21 **wanted to wait for FLP?**  
 22       A That's what I wrote -- what I read you was --  
 23 that's -- that's what my notes say.  
 24       **Q And when is -- when was -- was that your last**  
 25 **session with him, May the 28th?**

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1       A Yes.  
 2       **Q And did you have any interaction with the**  
 3 **mother on that date?**  
 4       A Brief. She told me -- she stated that client  
 5 hadn't seen Dad due to the death of the owner of  
 6 Hannah's House and that the intake at the new location  
 7 was successful.  
 8       **Q Did she say anything else?**  
 9       A You want me to read the -- exactly what I  
 10 wrote?  
 11       **Q Yes.**  
 12       A Did you find the note yourself? Do you want  
 13 me to read exactly? I'm sorry.  
 14       **Q Yeah.**  
 15       A This is under the parent report for other data  
 16 section. "Mother stated that client still had not seen  
 17 father due to death of owner of Hannah's House (where  
 18 supervised visits were scheduled) and that the intake at  
 19 the new location was successful. Mother stated that  
 20 client reported feeling happy with new location. Mother  
 21 reported that client expressed not wanting to visit  
 22 father at a different location."  
 23       **Q And have you had any further interaction with**  
 24 **Vickie Alexander?**  
 25       A No. I think I -- I -- other than the informed

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1 consents after the new round of -- for this and the  
 2 record request.  
 3       **Q And I'll ask you again, do you feel based on**  
 4 **your expressing fear of the father, reporting to the**  
 5 **Court that he was seen at your office building when he**  
 6 **says he was not there, not following through and**  
 7 **verifying, do you feel it is proper for you, considering**  
 8 **transference, countertransference and just the ethics of**  
 9 **your profession, to continue to see this child?**  
 10       MS. HAYES: Objection to form.  
 11       A I have fear at times. I feel that I can set  
 12 that aside and attempt to work with both sides for  
 13 the -- for the mental health of the client.  
 14       **Q And neither side -- I mean, do you -- are you**  
 15 **telling this Court and jury you think Rob Cottingham and**  
 16 **Nikki Ngo want to work with Lauriston Crockett on any**  
 17 **level?**  
 18       A They have expressed that to me.  
 19       **Q What have you seen? It's show and tell, but**  
 20 **it's more show. What have they shown you in two years**  
 21 **that they -- what have they done to demonstrate good**  
 22 **faith and cooperation in two years' time?**  
 23       MS. HAYES: Objection to form.  
 24       A The example of the -- when you had referenced  
 25 the hockey information when I -- they sent over the

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1 hockey equipment information when I stated that it was  
 2 important for the child to have both parents --  
 3       **Q The first game the father attended, they took**  
 4 **the kid home without him playing, didn't they?**  
 5       A I don't know.  
 6       **Q You didn't follow up and find out what**  
 7 **happened?**  
 8       A I don't recall what happened. I don't recall.  
 9       **Q Do you recall any game where Lauriston**  
 10 **Crockett was able to attend and see his child play?**  
 11       A He -- he shared with me that there were  
 12 practices, I believe. I'd have to -- there's been just  
 13 so much in the notes. I remember -- I remember them  
 14 talking about a practice. I don't know about the games.  
 15 I don't recall.  
 16       **Q And you have no idea what level of functioning**  
 17 **as a parent Nikki Ngo-Cottingham is doing now, do you?**  
 18       A No.  
 19       **Q Academically, socially interacting, you do not**  
 20 **know?**  
 21       A I'm not assessing for that, no.  
 22       **Q What are you assessing?**  
 23       A The client's ability to feel happy, less  
 24 anxious.  
 25       **Q And you're saying this little boy is happy?**

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1 A The times that he's happy, it's -- the last  
 2 several sessions, he's been very excited and happy.  
 3 **Q Happy. And the most important thing in the**  
 4 **world to him, if he could have anything he wanted, was**  
 5 **to have his parents be friends again, his mother and his**  
 6 **father, not Rob Cottingham, his mother and his father,**  
 7 **wasn't it?**  
 8 A That was one of the things that he had  
 9 mentioned in an [audio distortion] something he had  
 10 mentioned.  
 11 **Q Several times?**  
 12 A He has mentioned that he wants -- he would  
 13 love for -- he's mentioned in the past he wants his  
 14 parents to get back together and I think the last time  
 15 he mentioned that he wants them to be friends again.  
 16 **Q And you think that you have done a -- what do**  
 17 **you think you have achieved with this little boy,**  
 18 **Dr. Ritzi?**  
 19 A I'm -- that's a -- can you ask a more specific  
 20 question? I -- I --  
 21 **Q Well, don't you feel that the evidence will**  
 22 **show here, all the email, with all the text messages,**  
 23 **with the actions and with your testimony, that you have**  
 24 **put your thumb on the scale in favor of the Cottinghams?**  
 25 A I don't believe my records -- records show

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1 that.  
 2 **Q You don't believe that?**  
 3 A I don't. When I reread my notes, I -- I don't  
 4 believe that I have.  
 5 **Q And -- and you'll stand on that?**  
 6 A Yes, ma'am.  
 7 MS. HAYES: Objection.  
 8 MS. MCKNIGHT: No other questions.  
 9 MS. HAYES: I'll reserve.  
 10 VIDEOGRAPHER: We're off the record at  
 11 4:47 p.m., end of deposition.  
 12  
 13 (Proceedings concluded at 4:47 p.m.)  
 14  
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1 CHANGES AND SIGNATURE  
 2 WITNESS: ROCHELLE RITZI DATE: JUNE 2, 2020  
 3 PAGE LINE CHANGE REASON  
 4 \_\_\_\_\_  
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1 \_\_\_\_\_  
 2 \_\_\_\_\_  
 3 I, ROCHELLE RITZI, have read the foregoing  
 4 deposition and hereby affix my signature that same is  
 5 true and correct, except as noted above.  
 6  
 7 \_\_\_\_\_  
 8 ROCHELLE RITZI  
 9 THE STATE OF \_\_\_\_\_  
 10 COUNTY OF \_\_\_\_\_  
 11  
 12 Before me, \_\_\_\_\_, on this  
 13 day personally appeared ROCHELLE RITZI, known to me or  
 14 proved to me on the oath of \_\_\_\_\_ or through  
 15 \_\_\_\_\_ (description of identity card  
 16 or other document) to be the person whose name is  
 17 subscribed to the foregoing instrument and acknowledged  
 18 to me that he/she executed the same for the purpose and  
 19 consideration therein expressed.  
 20 Given under my hand and seal of office on this  
 21 \_\_\_\_\_ day of \_\_\_\_\_, \_\_\_\_\_.  
 22 \_\_\_\_\_  
 23 NOTARY PUBLIC IN AND FOR  
 24 THE STATE OF \_\_\_\_\_  
 25 My Commission Expires: \_\_\_\_\_

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1 CAUSE NO. DF-13-06713  
 2 IN THE INTEREST OF ) IN THE DISTRICT COURT  
 3 )  
 4 )  
 5 L.L.C. IV ) DALLAS COUNTY, TEXAS  
 6 )  
 7 )  
 8 A CHILD ) 256TH JUDICIAL DISTRICT  
 9  
 10 REPORTER'S CERTIFICATE  
 11 ORAL VIDEOTAPED DEPOSITION  
 12 OF ROCHELLE RITZI  
 13 JUNE 2, 2020  
 14 (REPORTED REMOTELY)  
 15 I, Christy Fagan, CSR, CRR, RMR, RPR, TMR, CLR,  
 16 Certified Shorthand Reporter in and for the State of  
 17 Texas, hereby certify to the following:  
 18 That the witness, ROCHELLE RITZI, was duly sworn and  
 19 that the transcript of the deposition is a true record  
 20 of the testimony given by the witness;  
 21 That the deposition transcript was duly submitted  
 22 on \_\_\_\_\_ to Ms. Laurel Clement,  
 23 Laurel Arnold Clement, PC, 555 Republic Drive, Suite  
 24 200, Plano, Texas 75074 for examination, signature, and  
 25 return to me by \_\_\_\_\_.

That pursuant to information given to the deposition officer at the time said testimony was taken, the following includes all parties of record and the amount of time used by each party at the time of the deposition:

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1 FOR THE PETITIONER (VIA VIDEOCONFERENCE):  
 2 Ms. Mary D. McKnight (3 hours 2 minutes)  
 3 The Law Office of Mary D. McKnight, P.C.  
 4 2620 State Street  
 5 Dallas, Texas 75204  
 6 (214) 871-9590  
 7 (214) 871-9889 Fax  
 8 mdm@hardfamilylaw.com  
 9  
 10 FOR THE RESPONDENT (VIA VIDEOCONFERENCE):  
 11 Ms. Kris Balekian Hayes (0 hours 0 minutes)  
 12 Balekian Hayes, PLLC  
 13 4144 N. Central Expressway  
 14 Suite 1200  
 15 Dallas, Texas 75204  
 16 (214) 828-2800  
 17 (214) 827-9671 Fax  
 18 kris@bh-pll.com  
 19  
 20 FOR THE WITNESS (VIA VIDEOCONFERENCE):  
 21  
 22 Laurel Arnold Clement, PC (0 hours 0 minutes)  
 23 555 Republic Drive  
 24 Suite 200  
 25 Plano, Texas 75074  
 (972) 422-9120  
 lclementlaw@gmail.com

I further certify that I am neither counsel for, related to, nor employed by any of the parties in the action in which this proceeding was taken, and further that I am not financially or otherwise interested in the outcome of this action.

Further certification requirements pursuant to Rule 203 of the Texas Rules of Civil Procedure will be complied with after they have occurred.

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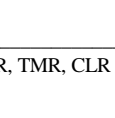
1 Certified to by me on this 7th day of June, 2020.  
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*Christy Fagan*  
 Christy Fagan, CSR, CRR, RMR, RPR, TMR, CLR  
 Texas CSR 5459  
 Expiration: 10/31/21  
 LEGAL SOLUTIONS COURT REPORTING  
 Firm Registration No. 424  
 2626 Cole Avenue  
 Suite 300  
 Dallas, Texas 75204  
 (866) 830-1717  
 (866) 651-4292 Fax  
 www.LegalSolutionsCourtReporting.com

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1 FURTHER CERTIFICATION UNDER TRCP RULE 203  
 2 The original deposition \_\_ was \_\_ was not returned to  
 3 the deposition officer on (or by) \_\_\_\_\_.  
 4 If returned, the attached Changes and Signature  
 5 page(s) contain(s) any changes and the reasons therefor.  
 6 If returned, the original deposition was delivered  
 7 to Ms. Mary McKnight, Custodial Attorney.  
 8 \$ \_\_\_\_\_ is the deposition officer's charges to  
 9 the Petitioner for preparing the original deposition and  
 10 any copies of exhibits;  
 11 The deposition was delivered in accordance with  
 12 Rule 203.3, and a copy of this certificate, served on  
 13 all parties shown herein, was filed with the Clerk.  
 14 Certified to by me on this \_\_\_\_ day of  
 15 \_\_\_\_\_, \_\_\_\_\_.  
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*Christy Fagan*  
 Christy Fagan, CSR, CRR, RMR, RPR, TMR, CLR  
 Texas CSR 5459  
 Expiration: 10/31/21  
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