



Transcript of the Testimony of **Nikki Ngo**

Date: December 17, 2019

Case: In the Interest of L.L.C. a Child

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CAUSE NO. DF-13-06713

IN THE INTEREST OF)	IN THE DISTRICT COURT
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)	
L.L.C. IV)	DALLAS COUNTY, TEXAS
)	
)	
A CHILD)	256TH JUDICIAL DISTRICT

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ORAL DEPOSITION

NIKKI NGO

DECEMBER 17, 2019

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ORAL DEPOSITION OF NIKKI NGO, produced as a witness at the instance of the Petitioner and duly sworn, was taken in the above-styled and numbered cause on December 17, 2019, from 1:34 p.m. to 4:32 p.m., before Christy Fagan, CSR, CRR, RMR, TMR, RPR, CLR in and for the State of Texas, reported by computerized stenotype machine at the offices of Balekian Hayes PLLC, 4144 N. Central Expressway, Suite 1200, Dallas, Texas, pursuant to the Texas Rules of Civil Procedure.

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ALSO PRESENT:

Mr. Rob Cottingham

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1 P R O C E E D I N G S

2 (Exhibit No. 1 marked.)

3 MS. MCKNIGHT: We're here for the
4 deposition of Nikki Ngo, and Mary McKnight here for
5 Mr. Crockett and Kris Balekian Hayes is for the
6 deponent.

7 It is December the 17th, 2019, at 1:30
8 p.m., approximately.

9 NIKKI NGO,
10 having been first duly sworn, testified as follows:

11 EXAMINATION

12 BY MS. MCKNIGHT:

13 Q Ma'am, would you state your full name for the
14 Court and jury, please.

15 A Diem Nikki Ngo.

16 Q And how old are you, ma'am?

17 A I'm 51.

18 Q And who are you married to?

19 A Rob Cottingham.

20 Q How long have you been married to
21 Mr. Cottingham?

22 A Over a year.

23 Q And before that, you were in a relationship
24 with Mr. Crockett; is that correct?

25 A Yes.

1 Q Lauriston Crockett, III?

2 A Yes.

3 Q And how long did you live with him?

4 A I want to say three years.

5 Q Three years? From what -- between what dates?

6 A Let me think for a minute.

7 Q Take your time.

8 A I'm sorry. Let me see. I'm sorry. It's 2009
9 to 2011, so probably June 2009.

10 Q You did not move out from him in 2013?

11 A '13, yes. I'm sorry, I got the date wrong.

12 Q 2013?

13 A 2013, yes. April.

14 Q And you and Mr. Crockett, do you remember what
15 month you moved in with him in 2009?

16 A June.

17 Q And what month was it in 2013 when you-all
18 separated?

19 A April.

20 Q And how old was your child --

21 A He was two.

22 Q -- when you separated?

23 A Two.

24 Q And you had had two other pregnancies while
25 with Mr. Crockett; had you not?

1 A Yes.

2 Q And miscarriages?

3 A Yes.

4 Q So even after -- you made a conscious effort
5 to get pregnant again after the two miscarriages; is
6 that correct?

7 A Yes.

8 Q And you wanted to have a child with
9 Mr. Crockett?

10 A Yes.

11 Q Now, you are a United States citizen; is that
12 correct?

13 A Yes.

14 Q And how old were you when you came to the
15 United States?

16 A Seven.

17 Q And the language that you used in all your
18 grade school, high school, all of that was English; is
19 that correct?

20 A Yes.

21 Q So English is basically your -- the language
22 you use day by day?

23 A Yes.

24 Q And what is your educational background?

25 A I went to Coppell High School. I went couple

1 of years to junior college.

2 Q What did you study in junior college?

3 A Just the basics. Like math and just took my
4 basics.

5 Q Did you get a degree?

6 A No.

7 Q And what do you do for a living?

8 A Hairdressing.

9 Q And how long have you been a hairdresser?

10 A Since 1998.

11 Q And you were married prior to that, prior to
12 moving in with Mr. Crockett; is that correct?

13 A Yes.

14 Q And how long were you married?

15 A Nine years.

16 Q Pardon?

17 A Nine years.

18 Q And no children by that marriage?

19 A No.

20 Q And your present husband, Mr. Cottingham, how
21 old is he?

22 A He's 56.

23 Q And what year was he born?

24 A 1954. Oh, I'm sorry. 1963.

25 Q Pardon?

1 A 1963.

2 Q 1963?

3 A Uh-huh.

4 Q And he has no children, does he?

5 A No.

6 Q And how is your health?

7 A Good.

8 Q Your health is good?

9 A (Witness nods affirmatively).

10 Q Are you seeing any physicians or mental health
11 professionals at this time?

12 A Yes.

13 Q Who do you see?

14 A I see Dr. Deborah Boelter.

15 Q And who is Dr. Deborah Boelter?

16 A She's my therapist/psychologist.

17 Q And how long have you been seeing Dr. Boelter?

18 A Two years.

19 Q Two years? Since January 2018?

20 A Yes.

21 Q Any other doctors that you're seeing?

22 A Not at the moment, no.

23 Q Is there any M.D. that you see, medical
24 doctor?

25 A Yes.

1 Q Who?

2 A Dr. Hania Alaidroos.

3 Q And is that doctor a general practitioner?

4 A Yes.

5 Q And what are you treated for?

6 A No, I just go to her for general maintenance.

7 Q Does she write you any prescriptions?

8 A Yes.

9 Q And what does she prescribe for you?

10 A She prescribe Prozac and Xanax.

11 Q And what milligram Prozac; do you know?

12 A Yes. 20 to 40.

13 Q 20 to 40. And what about Xanax?

14 A They're .5, as needed.

15 Q And do you currently have a prescription of
16 Xanax that you take?

17 A Yes.

18 Q How long have you been taking Xanax?

19 A On and off for a few years.

20 Q And how much is a few years? Is it five
21 years, ten years?

22 A Ten years.

23 Q Ten years. And before Dr. Arauzo or -- I may
24 have pronounced that wrong -- who prescribed you Xanax?

25 A Before Dr. Arauzo? Dr. Arauzo prescribed my

1 Xanax from the beginning.

2 Q For ten years?

3 A Well, Dr. Alaidroos is currently now. You're
4 asking about Dr. Arauzo.

5 Q And what do you take the Xanax for?

6 A Anxiety.

7 Q And how long have you been diagnosed with
8 anxiety?

9 A I have it on and off for the last ten years.

10 Q And when you separated from Mr. Crockett, did
11 you separate from him in April of 2013?

12 A Yes.

13 Q What happened at the time that you separated
14 from him? Was there an altercation between you and
15 Mr. Crockett?

16 A Yes.

17 Q And what was that altercation about?

18 A I needed some money to go see my attorney and
19 he would not let me have the money, the checkbook, so we
20 fought about that.

21 Q And then what happened after that?

22 A And I left the house and he -- I left the
23 house quickly because he was -- he grabbed the checkbook
24 from me and pushed me down.

25 Q When he pushed you down, who else was present?

1 A You know, in the room, no one was present, but
2 our nanny and my son was in the other room.

3 Q And what was your nanny's name at that time?

4 A Marilee Taylor.

5 Q And how long had she been your nanny?

6 A For about six months.

7 Q And who hired her? Did you locate her or did
8 Mr. Crockett?

9 A I did.

10 Q How did you locate her?

11 A Through Care Now.

12 Q And was she a full-time nanny?

13 A Yes.

14 Q So when he pushed you down, what room were you
15 in when he pushed you down?

16 A It was in his office.

17 Q Were you injured?

18 A You know, I was -- I mean, I'm sure it hurt,
19 but I ran to the car and he followed me outside and I
20 started the car and backed out, and he opened the door
21 and pulled me out.

22 Q Opened the door and pulled you out. Was the
23 car in motion when he pulled you out?

24 A Yes.

25 Q And what happened after he pulled you out?

1 A The car ran over my pelvis.

2 Q And were you conscious?

3 MS. HAYES: Objection to form.

4 Q Did you -- are you aware of whether or not you
5 passed out?

6 A I was passed out.

7 Q Pardon?

8 A I did pass out.

9 Q Well -- and when the paramedics came, did they
10 come to transport you to the hospital?

11 A I believe so.

12 Q And did you report Mr. Crockett's assault on
13 you to the police or the paramedics or to the hospital?

14 A No. Because I didn't remember.

15 Q You didn't remember? Now, when did you
16 remember?

17 A When I went to my therapist, and the more I
18 talked to her about it two years ago.

19 Q And this would be Dr. Deborah Boelter?

20 A Yes.

21 Q And how did she help you remember that
22 Mr. Crockett was the one who had pulled you out of the
23 car?

24 A She doesn't -- didn't -- I just talked to her
25 about it and it just became clear.

1 Q How did it become clear?

2 A I just remembered.

3 Q Pardon?

4 A I just remembered.

5 Q And prior to -- well, was it -- do you
6 remember what month it was that you remembered?

7 A It was that spring of 2018. Because I went to
8 see her January and, I think, a couple of months after
9 that.

10 Q And who did you report it to after you
11 remembered?

12 A I called my attorney and told my attorney
13 about it. And then --

14 Q Which attorney was that?

15 A Kris.

16 Q In April?

17 A I believe so.

18 Q Did you amend your pleadings and charge him
19 with assault?

20 A No. I went to -- Kris advised me --

21 MS. HAYES: Objection. Let me stop you
22 and say I don't want you to discuss anything in this
23 deposition that I've advised you in a legal capacity.

24 THE WITNESS: Okay.

25 Q Did you report it to the police?

1 A I tried.

2 Q Did the police talk to you about it?

3 A A detective did.

4 Q Which detective?

5 A I don't know his name.

6 Q Did you go to the police station and talk to
7 him in person?

8 A Yes.

9 Q And when did you go to the police station and
10 talk to the detective?

11 A It was shortly after. I don't remember the
12 day.

13 Q And that was in 2018?

14 A Yes.

15 Q And it was in 2013 when you were pulled, you
16 say --

17 A Yes.

18 Q -- out of the car?

19 A Yes.

20 Q And at the time that you -- you gave reports
21 to Dr. Seigel back in 2013; did you not?

22 A I believe so.

23 Q And you referred to your injuries as an
24 accident, didn't you, now?

25 A Because I didn't remember.

1 Q You didn't remember. Is there anything else
2 that you recalled suddenly while seeing Dr. Deborah
3 Boelter?

4 A (Witness nods negatively).

5 MS. HAYES: Objection to form.

6 A No.

7 Q No?

8 Now, you've listed experts in the
9 discovery that the ad litem served on you, and she asked
10 you to name the experts that you intend to call. Do you
11 recall that?

12 A I don't remember.

13 Q I'll show you. There's a copy. And it's here
14 on page 11. 10 and 11, I believe. You've listed
15 Ms. Hayes and Mr. Whiddon. You've listed Rochelle Ritzi
16 on page 10 and you've listed Steven G. Linville, a CPA.

17 A Yes.

18 Q And Jennifer Frendle.

19 A Yes.

20 Q Now, I do not see Ms. Boelter -- or
21 Dr. Boelter listed. Now, you're still seeing her; is
22 that correct?

23 A Yes.

24 Q And you are seeing her, according to your
25 interrogatory answers, because of abuse that you

1 suffered at the hands of Mr. Crockett; is that correct?

2 A Yes.

3 Q Now, I'll ask you, ma'am, you had lived with
4 Mr. Crockett for several years, couple of years at
5 least, at the time you got pregnant the first time?

6 A (Witness nods affirmatively).

7 Q She can't record a nod. You'll have to answer
8 yes or no.

9 A Yes.

10 Q And you've indicated in your writings that he
11 was abusive and physically abusive to you from the very
12 first; is that right?

13 A Yes.

14 Q Did you take any pictures of any of the abuse?

15 A You know, I had one picture and I sent it to
16 my friend Jackie, but I can't find it.

17 Q Well, did you -- I mean, what was the picture
18 of?

19 A When he pushed me and hit me in my mouth and
20 it bled.

21 Q Now, is that the one that you -- is that the
22 incident that you told the nanny about, Marilee?

23 A I don't remember.

24 Q Did you tell her that you hit yourself in the
25 mouth and you blamed him?

1 A No.

2 Q You don't remember telling her that?

3 A No.

4 Q Did she see your mouth bleeding?

5 MS. HAYES: Objection, form.

6 A No.

7 Q She did not see it. Did you show it to her?

8 A No. She wasn't there.

9 Q What date do you say that he hit you and made
10 your mouth bleed?

11 A I don't know the date.

12 Q Pardon?

13 A I don't know the date.

14 Q Well, were there any -- did you ever call
15 9-1-1 or make a police report of this abuse that went on
16 for all those years?

17 A No.

18 Q And why did you make a conscious decision,
19 Ms. Ngo, to have a baby with this man if he was
20 physically and emotionally abusive to you?

21 A I don't understand that either.

22 Q Well, now, what you were negotiating -- what
23 you wanted the day that you say he pulled you out of the
24 car and followed you out, were you backing out -- how
25 fast were you going when you backed out of the garage?

1 A I have no idea.

2 Q Where were you going?

3 A I was just wanting to leave.

4 Q Were you angry?

5 A I was.

6 Q And did Marilee ever come out?

7 A No.

8 Q Well, were you conscious? I thought you said
9 you passed out.

10 A I don't remember her coming out.

11 Q Well, do you remember who came to get you?

12 A I saw Mr. Crockett when I woke up on and off.

13 Q On and off. Well, where were you when you
14 woke up?

15 A I know I woke up -- I think I was on the floor
16 and then I woke up in the ambulance and then I woke up
17 in the hospital.

18 Q You were on the floor? Which floor?

19 A Outside.

20 Q There was a floor outside?

21 A I guess. I was on the floor when the car ran
22 me over.

23 Q Were you on the floor or in the driveway?

24 A That's what I mean, in the driveway probably.

25 Q Now, have you told your son, Lauriston IV,

1 that the father -- his father ran over you?

2 A Never.

3 Q You didn't discuss that with him?

4 A Never.

5 Q You've never had a discussion with him about
6 that?

7 A Not -- I never told him that.

8 Q Well, who all have you told that Lauriston
9 Crockett, III pulled you out of the car and ran over
10 you? Who have you told?

11 A I told my family --

12 MS. HAYES: I'm going to object to form.

13 And now you can answer.

14 Q Who in your family have you told?

15 A My sisters and my brothers and Rob.

16 Q When did you first tell Rob?

17 A I think I told him after I told my attorney.

18 Q You told your attorney before you told your
19 husband?

20 A Yes.

21 Q And when did you tell the police detective?

22 A Shortly after that.

23 Q Did you make an appointment or did you just go
24 down?

25 A I just went down.

1 Q Which police headquarters did you go to?

2 A The Dallas -- in the Cedars.

3 Q Where?

4 A The Cedars.

5 Q What location is it?

6 A It's downtown.

7 Q Where were you living at the time?

8 A On Wycliff.

9 Q And basically what did you tell him?

10 A I told him that I had a car incident where I
11 thought it was an accident but then I remembered it
12 wasn't and I'd like to file some papers and file
13 charges, and they said that it's been such a while,
14 it's -- there's a statute of limitation that's passed.

15 Q Now, were you seeing other counselors at the
16 time during the -- between 2009 and 2013 when you moved
17 out from Mr. Crockett, did you see any other counselors?

18 A No.

19 Q Any other mental health professionals?

20 A No.

21 Q Did you tell members of your family that he
22 was abusive?

23 A Yes.

24 Q Who did you tell?

25 A My sister Dee.

1 Q When did you tell her?

2 A Right -- just later. Later. Not, like, while
3 it's happening but later after we were -- we got done
4 with -- through.

5 Q After we got done what?

6 A After we broke up.

7 Q And did your son ask you about the incident?

8 A He did.

9 Q What did you tell him?

10 A I told him that he's too young to know and
11 that -- that he's just too young to know.

12 Q That's all you told him was that he was too
13 young to know?

14 A Yes. And I -- yes.

15 Q Well, I'm looking at a transcript here, ma'am,
16 that is about 12 pages long and you say that all you
17 told him was he's too young to know?

18 A Well, I mean, I told him that and then I said
19 that -- I asked him, "What do you know about my
20 accident?"

21 Q But you still called it an accident to him?

22 A Yes. I wasn't going to tell him that his dad
23 pulled me out of the car.

24 Q Now, you do not have her listed as a witness.
25 Did you plan to bring Deborah Boelter to court to

1 testify for you?

2 A Yes.

3 Q And do you have any idea why she's not listed
4 as a witness?

5 MS. HAYES: Objection to form.

6 Q You can answer.

7 A I think when we listed everybody in the
8 beginning, I don't think I saw her yet.

9 Q You've been seeing her since January of 2018,
10 and the disclosure here, let's see when it's dated,
11 October 2019. So you had been seeing her -- you had
12 seen her for a couple of years, nearly, by October 2019.
13 That's only a couple of months ago.

14 A Okay.

15 Q Now, you gave certain documents to Jennifer
16 Frendle when she was doing the social study; did you
17 not?

18 A Yes.

19 Q I'll show you this one page of Dr. Boelter's
20 report. Was there more that you didn't attach?

21 A I thought there was two pages to that.

22 Q Well, do you have the other page?

23 A I'm sure it's at home.

24 Q Can you attach it to your deposition? Or I
25 can get it from Dr. Boelter if she has it.

1 A Okay. I can attach it.

2 Q Okay. You can attach it.

3 And when did you last see Dr. Boelter?

4 A I saw her about two weeks ago.

5 Q And what are your issues that you're
6 discussing with her now?

7 A Just how to cope with Logan and to cope with
8 still the same issue with Mr. Crockett when I see him in
9 person just to calm my anxiety.

10 Q So what are your anxieties about now?

11 A You know, I have PTSD from Mr. Crockett.

12 Q Did you have PTSD before you met Mr. Crockett?

13 A No.

14 Q Did you have anxiety before you met
15 Mr. Crockett?

16 A Yes.

17 Q Were you taking Xanax before you met
18 Mr. Crockett?

19 A Yes.

20 Q So where did that anxiety come from?

21 MS. HAYES: Objection to form.

22 Q Do you know?

23 A Do I?

24 Q Well, now you had had several other
25 relationships. You had lived with other men; had you

1 not?

2 A Yes.

3 Q Who had you lived with?

4 A My husband Matt Dabney.

5 Q And who else?

6 A And Greg Nguyen, my boyfriend.

7 Q Your boyfriend. You lived with him a couple
8 of years or more, didn't you?

9 A Uh-huh.

10 Q How many years?

11 A I think five years.

12 Q In that five years, was he violent or
13 aggressive towards you?

14 A No.

15 Q Then why did you break up?

16 A He was older and he didn't want to get
17 married.

18 Q He didn't want to get married. How much older
19 was he?

20 A We were 20 years.

21 Q 20 years' difference. And, now, Mr. Crockett
22 was willing to get married; was he not?

23 A Yes.

24 Q And what you wanted was not what he was
25 prepared to give you; isn't that true?

1 MS. HAYES: Can we go off the record for
2 a second?

3 MS. MCKNIGHT: Yeah.

4 (Off-the-record discussion.)

5 Q Are you saying that Mr. Crockett was the first
6 man who was ever physically abusive to you?

7 A Yes.

8 MS. HAYES: Objection to form. And at
9 this point I'm going to go ahead and lodge a running
10 objection as to any question that seeks information
11 prior to the prior order in this case of 2013.

12 Q Now --

13 MS. HAYES: Now you can answer.

14 A Yes.

15 Q I'm going to show you --

16 MS. MCKNIGHT: And I'll give you a copy
17 too.

18 MS. HAYES: Thanks.

19 Q Here is your Verified Emergency Petition that
20 you went to court on seeking extraordinary relief. And
21 you filed this on 8/9, August the 9th, 2019; is that
22 correct?

23 A Yes.

24 Q Now, would you look over here on page 5 where
25 both you and Ms. Hayes -- 5 and 6, you and Ms. Hayes

1 have both sworn to it, you've sworn that you have --
2 that you -- the statements in the foregoing instrument
3 are true and correct, all the statements in this
4 petition.

5 Now, you say "Based on Petitioner's
6 history and information and recommendations contained in
7 the CCE report, Respondent has extreme concerns about
8 the safety and welfare of the child if Petitioner is
9 permitted to have any unsupervised access."

10 Now, Ms. Frenkle, the lady who wrote the
11 report, you provided her the information that she based
12 her recommendations on, did you not, ma'am?

13 MS. HAYES: Objection, form.

14 Q Didn't you?

15 A I don't understand that question.

16 Q You did not understand -- you gave Ms. Frenkle
17 a whole lot of information, didn't you?

18 A Yes.

19 Q And did you prepare a document for her -- you
20 filled out -- and I'll give you a marked copy of it.
21 Personal History Questionnaire, remember filling that
22 out in great detail?

23 A Yes.

24 Q And you gave that to Ms. Frenkle, didn't you?

25 A Yes.

1 (Exhibit No. 2 marked.)

2 Q And you also prepared a document -- here's
3 Deposition Exhibit No. 2, the Personal History
4 Questionnaire. That is a copy of what you provided.

5 MS. MCKNIGHT: Here's one for you as
6 well.

7 Q That is what you provided to Ms. Frenkle; did
8 you not?

9 A Yes.

10 MS. HAYES: Look through. Make sure it's
11 everything.

12 Q And some of the things that you told
13 Ms. Frenkle was that Mr. Crockett is an agoraphobic,
14 that he suffers from agoraphobia; did you not?

15 A Yes.

16 Q Who diagnosed him with agoraphobia?

17 A Dr. Art Arauzo.

18 Q And when did he diagnose him with that?

19 A I don't know.

20 Q Have you seen a written diagnosis?

21 A I have not, but it was in Dr. Seigel's report.

22 Q And so you have not seen any written
23 diagnosis. Have you seen any diagnosis by a doctor that
24 says he is not suffering from agoraphobia?

25 A No.

1 MS. HAYES: Objection to form.

2 Q Now, you've also made claims that he suffers
3 from Munchausen's by proxy. Do you know what that is?

4 A Yes.

5 Q And who has diagnosed him as having
6 Munchausen's by proxy?

7 A I don't know.

8 Q Are you aware of any diagnosis of that
9 nature --

10 A No.

11 Q -- that any professional has given him?

12 A No.

13 Q But you did represent that to Ms. Frenkle and
14 you've represented it to Dr. Ritzi, haven't you?

15 A Yes.

16 Q To both of them?

17 A Yes.

18 Q And that he's a pathological liar?

19 A Yes.

20 Q And liars, certainly, are not good role models
21 for children, are they, Ms. Ngo?

22 A No.

23 Q And do you lie to your child? You'll have to
24 speak up.

25 A It just depends.

1 Q Well, what does it depend on?

2 A Well, if he says to me, "Mom, do I look too
3 skinny," I'm going to say, "No." I mean, just --

4 Q No, that's not the kind of lie we're talking
5 about.

6 A Okay.

7 Q Do you tell lies like Mr. Crockett is 32- or
8 \$35,000 behind in child support?

9 A No.

10 Q Did you ever represent that to Ms. Alexander?

11 A No.

12 Q Did you ever tell anybody that he was a
13 deadbeat dad?

14 A Yes.

15 Q Who did you tell he was a deadbeat dad?

16 A I don't remember.

17 Q Ms. Alexander?

18 A I don't remember.

19 Q And did you suggest that he was not paying his
20 child support?

21 A No. Late.

22 Q Did you ask him to pay you directly and then
23 accept the money from him directly and then make claims
24 that he was in arrears?

25 MS. HAYES: Objection to form.

1 A No.

2 Q Now, Stockholm syndrome, did you tell anybody
3 that Lauriston suffers from Stockholm syndrome?

4 A Yes.

5 Q Do you know what Stockholm syndrome is?

6 A Yes.

7 Q Can you tell the Court?

8 A It's when -- it's based on a story that the
9 kid -- this group of people was kidnapped and they --
10 but eventually they later, like, wanted to protect the
11 kidnapers.

12 Q And you think -- and who all have you told
13 that your son is suffering from Stockholm syndrome?

14 A Few people.

15 Q Could you name one? Dr. Ritzi?

16 A I'm not sure. Dr. Ritzi or Frenkle.

17 Q You told Frenkle that, didn't you?

18 A Probably.

19 Q And who -- what professional has diagnosed
20 Lauriston Crockett, III as -- or your son, the IV, as
21 having Stockholm syndrome?

22 A No one.

23 Q You?

24 A Yes.

25 Q And you've told Frenkle and Ritzi and others

1 that your child's father is a racist, haven't you?

2 A Yes.

3 Q And you've said that he's a homophobic; have
4 you not?

5 A Yes.

6 Q And has any professional deemed him to be a
7 racist?

8 A Not that I know of.

9 Q What about a homophobic?

10 A I don't know.

11 Q Then have you prepared a document for
12 Ms. Frenkle or Ms. -- or Dr. Ritzi Reasons Why Lauriston
13 Crockett, III is an Unfit Father?

14 A Yes.

15 Q And who did you do that for?

16 A Do what for?

17 Q Who did you prepare that document -- who have
18 you given that to?

19 A I believe Frenkle.

20 Q You gave it to Frenkle. Reasons why he is an
21 unfit father?

22 A Yes.

23 (Exhibit No. 7 marked.)

24 Q Deposition Exhibit No. 7, is that something
25 you prepared?

1 A Yes.

2 Q And when did you prepare this?

3 A It was when she came and visit us at the
4 house.

5 Q Here's something I'm seeing here. "How is
6 Mr. Crockett's sleeping with Logan and spooning all
7 night viewed? This greatly concerns us. When will it
8 end?" So you do not feel parents should be sleeping
9 with children?

10 A I didn't say that.

11 Q How is Mr. -- did you -- well, "How is
12 Mr. Crockett sleeping with Logan and spooning all night
13 viewed? This greatly concerns us." What concerns you
14 about it?

15 A Because he's with him 24/7.

16 Q Now, Ms. Ngo, do you sleep with your son now?

17 A I do.

18 Q And you're married, fairly newly married; are
19 you not?

20 A Yes.

21 Q You have a husband in the next bedroom?

22 A Yes.

23 Q You sleep in a lower bunk bed with your son,
24 don't you?

25 A Yes.

1 Q Sharing one bunk bed?

2 A Yes.

3 Q And you make him go to bed at 8:30 at night?

4 A Yes.

5 Q And you're there in the bed with him?

6 A I have to be because --

7 Q Why?

8 A -- Mr. Crockett have made it like that.

9 Q Mr. Crockett has made it like that so that you
10 have to not sleep with your husband that you're married
11 to but sleep with your 7-year-old son in the lower bunk
12 of a bunk bed. Please tell the Court and jury how
13 Mr. Crockett has made that be so.

14 A Because the first -- when we went to court the
15 first time, the judge ordered us to let Logan sleep in
16 his own bed, but Mr. Crockett didn't do that. And when
17 I have Mr. -- Logan over at my house, he won't do that
18 because he's afraid. So when you do at one house, I
19 can't make Logan sleep by himself at the other house.

20 Q And you're claiming that Logan is afraid to
21 sleep by himself?

22 A Yes.

23 Q Now, have you told that -- have you told
24 Dr. Ritzi that you're sleeping with Logan?

25 A Yes.

1 Q And when did you tell her that?

2 A I told her numerous times.

3 Q And what does she say about you sleeping in a
4 bunk bed with him?

5 A She said right now, with all that he's going
6 through, it's fine.

7 Q All that he's going through. Do you think
8 that you are causing that child a great deal of stress
9 in trying to keep him from his father?

10 MS. HAYES: Objection to form.

11 Don't answer that question.

12 Q Well, now, you read Frenkle's report; did you
13 not?

14 A Yes.

15 Q And her concerns had -- well, we'll go over
16 those here in a minute, but if you could write out the
17 order right now for how this would all ultimately end,
18 Ms. Ngo, what sort of access would you want your son,
19 Lauriston, IV, to have to his father?

20 A I would limit him to supervised visitation.

21 Q So you're seeing for this kid for the next
22 umpteen years supervised visitation?

23 A Yes.

24 Q Do you think you should be supervised?

25 A No.

1 Q Now, would you look at this Deposition Exhibit
2 No. 1 and show me any facts in your affidavit or
3 Ms. Hayes' affidavit that warrant taking a child away
4 from a parent?

5 MS. HAYES: Objection to form.

6 Q You can answer. What facts are set out there?

7 A I don't understand the question.

8 Q Well, did you sign this under oath?

9 A Yes.

10 Q And you were saying -- you were verifying this
11 saying that there were facts that you had extreme
12 concerns about the welfare of your son. Well, where are
13 those facts in this document? Any facts at all.

14 A "Petitioner, has a history of violent
15 retaliation against Respondent causing serious injury,
16 exhibited past and present threatening behavior against
17 Respondent and her family, falsely reported child abuse
18 to government agencies against Respondent and her
19 family, and continues his attempts to alienate
20 Respondent from the child."

21 Q What page are you reading on?

22 A 2.

23 MS. HAYES: Paragraph 4.

24 Q Now, those are your allegations. That is not
25 in your affidavit. Tell me what violent retaliation

1 he's made against you causing serious injury.

2 A He pulled me out of a moving vehicle.

3 Q And that was back -- you suddenly remembered
4 that in 2018 that you say happened in 2013?

5 A Yes.

6 Q Why didn't you say that in your affidavit?

7 MS. HAYES: Objection to form.

8 Q Why did you -- if he pulled you out of a
9 vehicle and ran over you, why did you not put that in an
10 affidavit, Ms. Ngo?

11 MS. HAYES: Objection to form.

12 A I don't know.

13 Q You don't know? All right. Now, what has
14 he -- now, your mother is one of the people that you
15 claim he has terrorized too; is that correct?

16 A Yes.

17 Q If your mother is deposed, what is she going
18 to say?

19 MS. HAYES: Objection to form.

20 (Exhibit No. 3 marked.)

21 Q Now, you claim that he took naked pictures of
22 you, got you drunk, took naked pictures of you and gave
23 them to your parents. You said that --

24 A Yes.

25 Q -- in your interrogatories under oath, didn't

1 you?

2 A He dropped it off at the house.

3 Q You said that. And we'll get your
4 interrogatories here in a minute, but you --

5 A Yes.

6 Q -- swore under oath that he took naked
7 pictures of you --

8 A Yes.

9 Q -- got you drunk.

10 Now, for the record, you're still under
11 oath, when did Mr. Crockett take naked pictures of you?

12 A When we lived together.

13 Q What year? You lived together four years.

14 MS. HAYES: Objection to form.

15 A I don't remember.

16 Q Where did he take the naked pictures?

17 MS. HAYES: Objection to form.

18 A At his country club.

19 Q At his country club. Where is the location of
20 that country club?

21 A Prestonwood.

22 Q And where were you naked at the country club?

23 MS. HAYES: Objection to form.

24 Q Answer.

25 A Outside on the golf course.

1 Q You were naked on the golf course?

2 A (Witness nods affirmatively).

3 Q And he took -- you have to answer yes.

4 A Yes.

5 Q And what year was that, Ms. Ngo?

6 A When we were together. I don't know what year
7 it is.

8 Q Pardon?

9 A I don't know what year.

10 Q And how did -- what was he giving you to
11 drink?

12 MS. HAYES: Objection to form. I'm going
13 to cut off this line of questioning as it pertains to
14 abusive questions being sought for issues that occurred
15 beyond --

16 MS. MCKNIGHT: But she is alleging -- she
17 is making statements under oath alleging things that
18 happened before and she's using this in this same
19 affidavit you filed and sought extreme relief on, using
20 that as a basis, and I am entitled to examine her on it.

21 MS. HAYES: You're asking her regarding
22 pictures --

23 MS. MCKNIGHT: She's claimed in her
24 interrogatory answers, she answered that, and she didn't
25 limit it. She said he took naked pictures of her and

1 gave them to her parents. And you let her swear to that
2 and you distributed those interrogatory answers.

3 MS. HAYES: And your position is that
4 because she alleged that he retaliated in that capacity
5 historically that therefore it's relevant in a child
6 custody proceeding before the Court?

7 MS. MCKNIGHT: It is relevant, but she
8 needs to prove it because I don't believe it.

9 MS. HAYES: Do you understand that I
10 don't believe the question is relevant regardless of
11 whether or not --

12 MS. MCKNIGHT: I understand. You're
13 entitled to not believe it's relevant. We'll let the
14 judge decide that, but --

15 MS. HAYES: Did --

16 Q What did he give you to drink, Ms. Ngo?

17 A You know, I don't remember. He gave me
18 something. He knows I don't drink. I don't drink.

19 Q Well, had you posed for suggestive or naked
20 pictures before with other people?

21 MS. HAYES: Object as to form.

22 A No.

23 Q And you didn't take naked pictures with
24 another man?

25 MS. HAYES: Objection to form.

1 A You know, my husband.

2 Q And did you take suggestive, almost nude
3 pictures in bubble baths and in negligees and in
4 teddies?

5 A Yes.

6 Q What were the purpose of those pictures?

7 A They're just pictures.

8 Q Just pictures.

9 Now, isn't it true that Mr. Crockett
10 never gave anything to your parents? He did show your
11 brother Eddie some pictures but he did not give them to
12 your parents; isn't that true?

13 A No.

14 Q You're swearing here today that your mother
15 and father received those pictures?

16 A I said that he delivered those pictures and
17 I --

18 Q No.

19 A -- I got them. He sent them to my parents.

20 Q There's your answers to interrogatories.

21 MS. HAYES: What page?

22 MS. MCKNIGHT: I'm looking for it.

23 Q Well, I'm looking for it. When do you allege
24 that Mr. Crockett had naked pictures of you delivered to
25 your parents?

1 A I don't remember when, but I remember being
2 home and it was there at the -- someone --

3 MS. HAYES: Objection, nonresponsive.

4 Q And you said repeatedly in these interrogatory
5 answers that your son is afraid of Mr. Crockett; have
6 you not?

7 A Yes.

8 Q And who else -- has anybody else observed that
9 this child is afraid of his father?

10 MS. HAYES: Objection to form.

11 A Yes.

12 Q Have you obtained and read any or all of the
13 Hannah's House observation notes?

14 A I have not.

15 Q And have you contacted the -- Hannah's House
16 and talked to Betty Stone or anyone else there and asked
17 to change supervisors?

18 A Yes.

19 Q Why did you do that?

20 A Because I felt like one of the supervisors was
21 not in the middle anymore. She was -- what do you call
22 that? She's no longer -- they're supposed to be neutral
23 and she's no longer neutral.

24 Q And what supervisor was that that you
25 complained of?

1 A I don't remember her name.

2 Q Was it Donna?

3 A Yes.

4 Q All right. And why did you say -- you haven't
5 read any of the reports. Why did you say she was no
6 longer neutral?

7 A Because when my husband went in to pick up
8 Logan, she told my husband that "You need to find that
9 cross necklace and he needs to be wearing it the next
10 time he see his father. He had that necklace since he
11 was a baby."

12 Q Do you know where his cross necklace is?

13 A No.

14 Q Did you take it?

15 A No.

16 Q And you have not read any of the reports,
17 that's your testimony?

18 A Yes.

19 Q Have you asked that they be changed -- that
20 the supervisor be changed more than once?

21 A No. Just that once.

22 Q Now, did Mr. Crockett or Mr. Cottingham and
23 you take the child to Canada skiing?

24 A No.

25 Q Where did you take him skiing?

1 A Minneapolis.

2 Q Where?

3 A Minneapolis.

4 Q And when did you take him skiing?

5 A Last winter.

6 Q And was there an incident when Crockett --
7 when your son got separated from your husband,
8 Mr. Cottingham, and had to call the -- find the ski
9 patrol? Were you aware of that?

10 A No.

11 Q You were not aware of -- did Mr. Cottingham
12 not tell you?

13 A No.

14 MS. HAYES: Objection to form.

15 Q And you have not heard of a situation --

16 A No.

17 Q -- and you haven't read the Hannah's House
18 notes where your son described it to your -- his father
19 and the supervisor?

20 A No.

21 Q Have you delegated the right to Mr. Cottingham
22 to take your son for medical care without you or the
23 father?

24 A Yes.

25 Q When did you do that?

1 A Well, he can take him to the doctor when he's
2 sick. I don't know when he was sick, but one time he
3 was sick and he took him to the doctor.

4 Q It wasn't a one-time thing. You have
5 delegated that for --

6 A Okay.

7 Q -- any time, haven't you?

8 A Yes.

9 Q And did you let Mr. Crockett know you had done
10 that?

11 A No.

12 Q You feel that's your right to just replace him
13 with the stepfather?

14 MS. HAYES: Objection, form.

15 Don't answer that question.

16 Q And Mr. Cottingham is the one who does most of
17 the writing and responding to Mr. Crockett and to
18 Ms. Ritzi, doesn't he?

19 A Not most. Half maybe.

20 Q And he does a lot of your -- he did a lot of
21 your writing for the social study; did he not?

22 A No.

23 Q He wrote some of the same things for yourself
24 and for him, didn't he?

25 A I don't understand what you're saying.

1 Q You're saying that Mr. Cottingham did not do
2 your writing for you?

3 A No. We write it together.

4 Q You write it together?

5 A Yes.

6 Q Now, you were saying here that Mr. Crockett is
7 in breach of contract regarding a settlement for the
8 financial welfare of Logan?

9 A Yes.

10 Q That he's supposed to secure a \$1 million life
11 insurance policy?

12 A Yes.

13 Q And to establish a trust?

14 A Yes.

15 Q And to do it with 200,000 at the rate of at
16 least 500 a month for four years?

17 A Yes.

18 Q Have you filed to enforce that?

19 A We tried.

20 Q And the judge told you you had also breached
21 the contract, didn't he?

22 A No.

23 Q Were you able to enforce it?

24 A We haven't gone back.

25 Q Well, you were before Judge Lopez; is that

1 right?

2 A Yes.

3 Q Well, who do you go back to?

4 MS. HAYES: Objection to form.

5 You can answer; if you know.

6 A I don't know.

7 Q And Logan has reported being spanked because
8 he allowed his mother and others to call him Logan.

9 Now, who did he tell that he had been spanked?

10 A Rob and I.

11 Q You and Rob. You said over and over in here
12 that his dad makes him lie?

13 A Yes.

14 Q What does he lie about?

15 MS. HAYES: Objection to form.

16 Q I'm looking here at page 17 of your responses
17 here.

18 MS. HAYES: To interrogatories?

19 MS. MCKNIGHT: Uh-huh.

20 MS. HAYES: Here you go.

21 Q Page 17 at the top. "I am very, very sorry.
22 I said a lie for my dad. My dad told me to say that.
23 I'm so sorry for what I've done. He (Mr. Crockett) was
24 happy that I did that. I know it made you very, very
25 sad. Please forgive me."

1 Now, you say Logan wrote this to Rob
2 Cottingham?

3 A Yes.

4 Q Do you still have that?

5 A I'm not sure.

6 Q Well, it seems to me like something you would
7 have saved if, in fact, the child wrote that.

8 MS. HAYES: Objection to form.

9 Q You didn't save that?

10 A I might have it.

11 Q Now, you've alleged here again that
12 "Mr. Crockett filed a lawsuit against Mr. Cottingham, my
13 attorneys and I alleging I hacked into his company's IT
14 system and are in possession of the company's
15 intellectual property or trade secrets." What happened
16 on that?

17 A It got -- nothing happened.

18 Q You gave back some documents, didn't you, and
19 you signed a Rule 11 Agreement?

20 A Yes.

21 Q But you did give back documents that you had
22 taken; did you not? That's a "yes" or "no," Ms. Ngo.

23 A I don't remember.

24 Q Well, you put it in here claiming that -- you
25 said that there's been no court setting since our

1 original appearance, and the reason for that was you
2 gave back the documents and agreed not to do it anymore.
3 Isn't that true?

4 A I don't remember.

5 Q Would you like to see the Rule 11 Agreement
6 signed November 29th, 2018?

7 MS. HAYES: Thanks.

8 Q Do you recall signing that now?

9 A Yes.

10 Q But you didn't mention that when you were
11 complaining here about them filing lawsuits against you
12 and you'd never been back to court, did you?

13 MS. HAYES: Object as to form.

14 Q You did not mention signing the Rule 11
15 Agreement, did you?

16 A No.

17 Q And you're mentioning here on page 12 of 19
18 here in your interrogatory answers all the degrees the
19 different members of your family have. Do you have a
20 degree, Ms. Ngo?

21 A No.

22 Q You work as a part-time hairdresser; is that
23 correct?

24 A Yes.

25 Q And you said you earn about \$1,400 a month; is

1 that right?

2 A Yes.

3 Q And your husband, Mr. Cottingham, owns a dog
4 kennel -- or runs and operates a dog kennel down on
5 Harry Hines; is that right?

6 A Yes.

7 Q And does he own the land there that's
8 associated with the dog kennel or does he lease it?

9 A Lease.

10 Q Do you own any real property or do you lease
11 an apartment?

12 A Lease.

13 Q And do you feel that Mr. -- what plans do you
14 have to try to make Mr. Crockett purchase a million
15 dollar life insurance policy with you as the -- with
16 your son as the beneficiary?

17 A What?

18 Q What plan do you have to try to enforce
19 Mr. Crockett buying a million dollar life insurance
20 policy?

21 A I'm not sure.

22 Q You're not sure? You did state to your son
23 that when his daddy died, he would get a lot of money
24 and he needed to split it with you, didn't you?

25 A No.

1 Q You've never said that?

2 A No.

3 Q Do you know why your son would be telling that
4 to third persons?

5 MS. HAYES: Objection to form.

6 A No.

7 Q And you're saying here today under oath you
8 never said that he would get a lot of money when his
9 daddy died?

10 A No.

11 Q You have not listed here the name of the
12 police officer that you talked to when you attempted to
13 file charges on Mr. Crockett after your recovered
14 memory. Do you recall the name of that officer?

15 A No.

16 Q Did you fill out any documents?

17 A No.

18 Q Did they take a statement from you?

19 A No.

20 Q Now, when you learned that Ms. Alexander had
21 agreed to spend Christmas Eve supervising your son and
22 his father, did you make calls to Ms. Ritzi about that?

23 A Yes.

24 Q And you complained about it, didn't you?

25 A Yes.

1 Q What didn't you like about your son going to a
2 Christmas Eve mass with his ad litem and his father?

3 A I didn't -- I just had -- you know, it's just
4 because we like to --

5 Q No, I don't know.

6 A We like to have that day with him too.

7 Q Well, and you have all the days. He has two
8 hours a week at Hannah's House, and you did not want him
9 to go to Christmas Eve mass with his father?

10 A I was worried that Logan would regress.

11 Q And he misses his dad, doesn't he?

12 MS. HAYES: Objection to form.

13 Q You're his mother. Do you not see that that
14 little boy is grieving?

15 A No.

16 Q You don't see that?

17 A No.

18 Q And why haven't you read the Hannah's House
19 notes?

20 A I haven't gotten it.

21 Q Huh?

22 A I have not gotten it.

23 Q Well, are you aware that your lawyer has filed
24 them as a business record with the Court?

25 A You know, I'll take that back. I think we got

1 one, but I haven't gotten the rest of it.

2 Q Well, are you interested in what goes on there
3 between your son and his father?

4 A Yes.

5 Q And you haven't bothered, you say, to get the
6 notes and read them?

7 A Not the rest of the notes, no.

8 Q And would you be interested in whether or not
9 he's telling that Mr. -- your husband lost him during a
10 ski trip and he had to get the ski patrol?

11 A No.

12 Q Well, if that happened, you're saying that you
13 have no knowledge of that happening?

14 A No.

15 Q And what ski lodge were they at?

16 A I don't remember the name.

17 Q Well, what town was it? We can check, see if
18 they have a record of it.

19 A Somewhere in Minneapolis. I don't know.

20 Q Somewhere in Minneapolis. Well -- and you
21 don't know -- did you write a check for it or pay by
22 credit card?

23 A I'm sure it's credit card.

24 Q Well, I'm going to leave a blank in your
25 deposition and if you can find out where you went for

1 the ski trip, we will check and see if they have a
2 record of a child being separated from the adult --

3 A Okay.

4 Q -- and being picked up by the ski patrol.

5 A Okay.

6 Q And he didn't say anything -- Lauriston didn't
7 say anything to you about that?

8 A No. Because it didn't happen.

9 Q Is that something your son just lied about?

10 MS. HAYES: Objection to form.

11 A He likes to do that -- stuff like that to
12 please his dad.

13 Q So you're going to find out the name of the
14 ski place and write it in?

15 A Yes.

16 Q When did you have your last back surgery?

17 A A surgery to help with my back in
18 October 16th.

19 Q Of 2016?

20 A Yes. 2018 -- no. 2019. Just now.

21 Q Just now? Okay. So did you get painkillers
22 for that?

23 A I did.

24 Q What painkillers did you get?

25 A I got some hydrocodone.

1 Q And who prescribed you the hydrocodone?

2 A The doctor.

3 Q Well, I understand that, but what facility did
4 you have your surgery at?

5 A Dr. Raphael.

6 Q What facility? Dr. Raphael, I assume, is not
7 a facility. Was it a hospital?

8 A He has his own. I don't know what the surgery
9 center is. Plano.

10 Q In Plano. What is it called?

11 A Plano Surgery Center.

12 Q Plano Surgery Center?

13 A I believe so.

14 Q And that was in October 2019?

15 A Yes.

16 Q And do you still take the hydrocodone?

17 A No.

18 Q How many refills did you get?

19 A I believe one.

20 Q Now, other than Xanax, Prozac, and hydrocodone
21 in October, have you had any other muscle relaxers,
22 antianxiety medication, or painkillers?

23 A I might have muscle relaxer when my back hurt.

24 Q Would that have been Valium or Soma?

25 A I'm not sure what it's called. It's not

1 Valium.

2 Q Was it a prescription?

3 A Yes.

4 Q And did Dr. Raphael write you the
5 prescription?

6 A No.

7 Q Who?

8 A It's Dr. Cole.

9 Q C-o-l-e?

10 A Uh-huh.

11 Q And where is Dr. Cole?

12 A He's in Carrollton off of Trinity Mills.

13 Q And what do you see Dr. Cole for?

14 A When I have either back issues or if I --

15 Q Now, I don't see Dr. Cole listed here in your
16 interrogatory answers or request for -- I'm looking at
17 page 6 for all health care providers for mental or
18 physical conditions for the last three years. Dr. Cole
19 on Trinity Mills?

20 A Yes. Dr. Cole, I mean, I've seen him this
21 year.

22 Q 2019?

23 A Yes.

24 Q How many times have you seen him?

25 A A few times.

1 Q A few times. And did he write you a
2 prescription each time you saw him?

3 A No. I think one time -- what did I see him
4 for this last time? I don't know if I went to him this
5 last time for -- I don't know if I had a cold that I
6 went to see him for.

7 Q But Dr. Cole is on Trinity -- if we give you a
8 HIPAA release, will you sign it so we may obtain your
9 medical records?

10 A Yes.

11 Q For these doctors?

12 A Yes.

13 Q And Dr. Hania Alaidroos?

14 A Uh-huh.

15 Q Green -- Arbor Green Family Medicine Clinic on
16 Preston Road, what do you see -- what is the last time
17 you saw her or him?

18 A I saw her -- I think I had a cold.

19 Q When?

20 A Three months ago.

21 Q Pardon?

22 A Three months ago maybe.

23 Q Do you have a primary care physician?

24 A She's it.

25 Q She's the PCP? Okay. And Dr. Jennifer Zimmer

1 at Scott & White Plano?

2 A Yes. She was my older -- she's the previous.

3 Q Previous PCP?

4 A Because I changed insurance.

5 Q And what did she write you prescriptions for?

6 A I think the same stuff. I don't remember.

7 Q And Dr. Boelter does not write prescriptions;
8 is that correct?

9 A No.

10 Q Now, you signed these interrogatory answers
11 April 2018, and you refer -- and you'd been seeing
12 Dr. what's her name since January of 2018. You refer to
13 your accident here in your interrogatories. Why didn't
14 you say that he pulled you out of the car and ran over
15 you?

16 A You know, it's something that I didn't want to
17 discuss then.

18 Q You didn't want to discuss it but you do want
19 to discuss it now? Can you tell the Court and jury why
20 you would want to discuss it now when you were swearing
21 to your answers under oath?

22 A I don't understand what you're asking.

23 Q Pardon?

24 A I don't understand what you're --

25 Q Well, you said you did not want to discuss it

1 back then. When you were answering these
2 interrogatories, you did not want to discuss it. What
3 made you want to discuss it?

4 A You know, I signed this April 2018 and I'm not
5 sure when I remembered.

6 Q Well, when you remembered, did you say, "We
7 better amend my answers. I want to get that out there"?

8 A I just told my attorney.

9 Q Are you going to amend your answers and say
10 that he pulled you out of the car and ran over you?

11 A I'd just have to discuss with my attorney
12 about that.

13 Q Now, you say Mr. Crockett lacks a certain kind
14 of intuitive and fairness or integrity. Do you think
15 it's fair or an indication of integrity to blame people
16 for things they did not do?

17 MS. HAYES: Objection to form.

18 Q Do you?

19 A Do I what?

20 Q Do you believe you have fairness and integrity
21 in blaming Mr. Crockett now in 2019 for something that
22 you did to yourself in 2013?

23 MS. HAYES: Objection to form.

24 Don't answer that question.

25 Q Now, do you think it would be best for

1 Lauriston if Mr. Crockett were just not in the picture
2 and Mr. Cottingham could adopt him?

3 A Yes.

4 Q And you would like to see him just gone, is
5 that right, out of Lauriston's life?

6 A Yes.

7 Q And is that what you're trying to accomplish
8 here, ma'am, by making these claims that he tried to
9 kill you and that he is all of these things that you've
10 alleged?

11 MS. HAYES: Objection to form.

12 Q This unfit parent, how is truthfulness, lying
13 viewed. Well, I think we can agree a lying parent is
14 not a good parent, right?

15 A Yes.

16 Q And you're claiming that he has failed to
17 fulfill his financial agreement. Did you fulfill your
18 financial agreement?

19 MS. HAYES: Objection to form.

20 Q You didn't, did you?

21 A As in?

22 Q See, here in May, in this document here that
23 you've acknowledged that you wrote and did it for
24 Jennifer Frendle, May the 25th, 2018, you wrote this
25 letter that you attached here to Lauriston, "Thanks to

1 finally being able to remember what occurred when I was
2 run over by my own SUV and you being the reason I fell
3 under the car because you dragged me out of a moving
4 vehicle, I'm terrified to be anywhere near you. It
5 makes me physically ill." Is that what you wrote to
6 him?

7 A Yes.

8 Q "You were physically, verbally, and
9 emotionally abusive to me during our relationship. You
10 are my me too moment." Did you during that whole four
11 years and three pregnancies ever make any reports, call
12 9-1-1, talk to a counselor or do anything that indicated
13 that Lauriston Crockett, III was abusive?

14 A I didn't report it.

15 Q Huh?

16 A I did not report.

17 Q Now, you're saying that --

18 MS. HAYES: Can you hear her?

19 THE REPORTER: Yes.

20 MS. HAYES: Okay.

21 Q Lauriston Crockett, III you're saying is a
22 pathological liar. That's --

23 A Yes.

24 Q -- what you're saying about him?

25 A Yes.

1 Q Have you ever taken a polygraph, Ms. Ngo?

2 A Yes.

3 Q You have?

4 A Have I what?

5 Q Taken a polygraph test.

6 A No.

7 Q And would you like to take one --

8 MS. HAYES: Objection to form.

9 Q -- to establish that you're telling the truth
10 and he's telling a lie?

11 MS. HAYES: Objection to form.

12 You don't need to answer that question.

13 Q I take it by your silence you would not like
14 to take one?

15 MS. HAYES: Objection to form.

16 You don't need to answer that question.

17 Q Now, you have also said that Mr. Crockett has
18 kept your brother from becoming a priest. You made that
19 statement in writing too.

20 A Yes.

21 Q Pardon?

22 A Yes.

23 Q And is your brother a priest?

24 A Almost.

25 Q Well, I thought you said that Mr. Crockett

1 prevented him from becoming a priest. You made that
2 representation in writing under oath in your answers,
3 didn't you?

4 A Yes.

5 Q Well, if he's almost a priest, he was not
6 kicked out of the order, was he?

7 A He tried to.

8 Q That isn't what you -- you didn't say he tried
9 to, you said he has prevented my brother from becoming a
10 priest. That's what you said, wasn't it, in writing
11 under oath?

12 MS. HAYES: Can you direct us, Mary?

13 MS. MCKNIGHT: I'll have to -- I'll look
14 it up, but it's there, I promise you. Interrogatories.

15 Q Now, you're saying that Lauriston, IV said to
16 Rob Cottingham "My daddy is a bully to you"?

17 A Yes.

18 Q And when did he say that?

19 A He said it numerous times.

20 Q And what did his dad tell him to say? What
21 lies are you and Mr. Cottingham alleging that
22 Mr. Crockett has had Lauriston say?

23 MS. HAYES: Objection to form.

24 Q You said that he has -- "I'm very sorry I said
25 a lie for my dad. My dad told me to say that." Told

1 him to say what?

2 A Whatever lie he said that day.

3 Q Well, you know that -- you've read the
4 interviews and you read the forensic police interviews
5 and you've read the CPS interviews. You know that your
6 son said your brother took a bath with him naked. You
7 know he said that, don't you?

8 MS. HAYES: Objection to form.

9 A I read it.

10 Q You read it, that the police and the CPS
11 people wrote down what your son said, and he said --
12 this is Lauriston, IV, not Mr. Crockett, said that your
13 brother took a bath with him without any clothes on,
14 didn't he, and somebody wrote it down?

15 A That's what he lied about.

16 Q And you're saying that he lied about it and
17 his daddy made him lie about it?

18 A Yes.

19 Q And did his daddy make him lie about being
20 bitten?

21 A Probably.

22 Q Did you ever bite him, ma'am?

23 A No.

24 Q You didn't bite him even just playing?

25 A Play biting.

1 Q Play biting. When did you play bite him?

2 A All the time.

3 Q All the time you play bit him?

4 A Uh-huh.

5 Q And when did you start play biting him?

6 A Since he was a baby.

7 Q Pardon?

8 A Since he was a baby.

9 Q Since he was a baby. So is biting sort of --
10 something that your family kind of does?

11 A Play biting, yes.

12 Q Does Mr. Crockett play bite him?

13 A No.

14 Q Has he ever play bitten him?

15 A No.

16 Q Have any of your brothers play bitten him?

17 A I don't know.

18 Q You don't know. Now, you've seen the pictures
19 that Mr. Crockett took of the bite marks, haven't you?

20 A Yes.

21 Q And are you denying that those are bite marks?

22 MS. HAYES: Objection to form.

23 A (Witness nods negatively).

24 Q Are you denying it?

25 MS. HAYES: Objection to form.

1 Q You can answer.

2 A I'm not denying anything.

3 Q You're not denying anything. Did you bite him
4 and leave a mark?

5 A No.

6 Q Did you look after you had bitten him to see
7 if there were marks?

8 A No.

9 (Exhibit No. 11 marked.)

10 Q Show you Depo 11. Have you seen those
11 pictures before?

12 A No.

13 Q When is the last time you play bit him?

14 A I don't know.

15 Q Pardon?

16 A I don't remember. I mean . . .

17 Q Now, do you recall an occasion where he was
18 facetiming with his father and he hit you in the face?

19 A No.

20 Q You don't recall that? Do you recall biting
21 him afterward?

22 A No.

23 Q You don't recall anything about that?

24 A No.

25 (Exhibit No. 12 marked.)

1 Q Now, back in April -- on April the 23rd, 2019,
2 you and Mr. Cottingham alleged that Mr. Crockett had
3 abused his son, didn't you?

4 A Yes.

5 Q And what did you allege that he did?

6 A That he grabbed him.

7 Q Grabbed him. And did this child -- did you
8 have him interviewed?

9 A Yes.

10 Q Who interviewed him?

11 A The -- first, the Highland Park Police.

12 Q And after the Highland Park Police interviewed
13 him, who interviewed him?

14 A We took him to the emergency room in Plano.

15 Q Did your son ever tell anybody that his father
16 injured him in any way?

17 A No.

18 Q He did not?

19 A No.

20 Q It was you and Mr. Cottingham making that
21 allegation, weren't you?

22 A That's what we think that happened.

23 Q And the son told you that he fell off of his
24 bicycle, didn't he? That he had a bicycle accident?

25 A Yes.

1 Q But he never told anybody that he -- he never
2 told anybody that he was injured by his father?

3 A He wouldn't.

4 Q And there was no -- I mean, there's no
5 pictures of any serious injuries here or anything.

6 A We took pictures.

7 Q Where are the pictures? Did you report it to
8 CPS?

9 A No.

10 Q Did the police report it to CPS?

11 A No.

12 MS. HAYES: Objection to form.

13 Q You took him to the emergency room and did you
14 tell the doctors there that you believed his father had
15 grabbed him?

16 A Yes.

17 Q And what did they do or what was their
18 response?

19 A You know, they interviewed Logan and Logan
20 wouldn't say. So when Logan doesn't say, they're not
21 going to do anything.

22 Q It wasn't that he wouldn't say, he said his
23 father didn't do it. He didn't refuse to talk, did he?

24 A Well, he lied.

25 Q That was another time that you say Logan -- or

1 Lauriston lied. Now, do you, as a parent, Ms. Ngo, have
2 any idea what effect it has on a child if they're
3 telling the truth and a parent is accusing them of
4 lying?

5 A Yes.

6 MS. HAYES: Objection to form.

7 Q And do you realize that -- do you believe that
8 Logan really wants to be with his father?

9 A No.

10 Q You don't believe that?

11 A No.

12 Q And, yet, Mr. Cottingham wrote in one of these
13 writings to Nikki -- to Rochelle Ritzi, I don't
14 understand why he wants to be with him when, you know,
15 basically we're so much better. Do you remember him
16 writing that?

17 A We're so much better?

18 Q When we're so much better for him and all
19 that. But he was acknowledging that he knew your son
20 wants to be with his dad.

21 A Okay.

22 Q And you don't know that?

23 A I don't.

24 Q You don't know that?

25 A No.

1 Q Do you think you have any perception about
2 this child's feelings?

3 A Yes.

4 Q And what about his name, all of this thing
5 about his name? What does your son want to be called?

6 MS. HAYES: Objection to form.

7 Q You know. You're his mother.

8 A When he's with me, he wants to be called
9 Logan. When he's with Dad, he wants to be called
10 Lauriston.

11 Q You're saying he wants to be called Logan.
12 Has he ever told anybody he wants to be called Logan?

13 MS. HAYES: Objection to form.

14 A Yes.

15 Q Who?

16 A Rochelle Ritzi.

17 Q He's told her he wants to be called Logan?

18 A He didn't say --

19 Q When did he tell her that?

20 A He didn't say it, but he wrote it on her
21 board, Logan.

22 Q And you text back and forth to Rochelle Ritzi
23 all the time, don't you?

24 A Yes.

25 Q And you text her early in December, you were

1 so excited because you had learned that Mr. Crockett's
2 attorney was withdrawing?

3 A Yes.

4 Q And she responds, "Wow." Were you guys really
5 happy that he was going?

6 A I was just --

7 Q What was -- why did you feel she needed to
8 know that immediately?

9 A I just wanted to tell her.

10 Q Huh?

11 A I just wanted to tell her.

12 Q And her response, "Wow," how did you interpret
13 that?

14 A I didn't interpret.

15 Q Now, when you had this nanny, Marilee, did you
16 confide in her a lot?

17 MS. HAYES: Objection to form.

18 A Some.

19 Q What did you talk to her about?

20 MS. HAYES: Objection to form.

21 A I don't remember.

22 Q Of personal things.

23 A I don't remember.

24 Q Now, the day that you and he had a fight -- or
25 had an argument and you ran out of the house, you told

1 him you wanted the million dollars in life insurance,
2 you wanted 7,000 a month to live on, and you wanted him
3 to pay for the nanny. You told him that, didn't you?

4 MS. HAYES: Objection to form.

5 A I don't remember.

6 Q You don't remember? And you -- and do you
7 remember telling her "He didn't hit me but he pushed me
8 away from him and the baby. When I showed up at work on
9 Monday, Ms. Ngo showed me a picture of her lip that she
10 had taken on her cell phone and told me that once she
11 got to work, she bit it so it would look worse than it
12 really was"? Do you remember telling her that?

13 A No.

14 Q And did you leave a bong behind?

15 MS. HAYES: Objection to form.

16 You need not answer that question.

17 Q Did you have a bong?

18 MS. HAYES: You need not answer that
19 question.

20 Objection, form.

21 Q And did the bong have residues of cocaine and
22 marijuana?

23 MS. HAYES: You need not answer that
24 question.

25 Objection to form as well.

1 Q So do you propose -- if it doesn't work in
2 court, how do you propose to get Mr. Crockett out of
3 Lauriston, IV's life?

4 MS. HAYES: Objection to form.

5 Q How do you propose to do it?

6 MS. HAYES: Objection to form.

7 A I don't understand the question.

8 Q You did say that you would like for Lauriston
9 Crockett, III not to be in your son's life. That was
10 your statement; is that correct?

11 A Yes.

12 Q And do you think that is what Lauriston would
13 like?

14 MS. HAYES: Objection to form.

15 A The father?

16 Q No. Your son's name is Lauriston Crockett,
17 IV; is it not?

18 A Yes. But you didn't say IV.

19 Q Well, do you think Lauriston, IV would like to
20 have his father, his daddy, out of his life?

21 MS. HAYES: Objection to form.

22 A I don't know.

23 Q You don't know? That is your sworn testimony
24 here as his mother that you do not know if this little
25 boy would like to have his daddy out of his life?

1 A He's just a kid. I don't know.

2 Q Where did you meet Mr. Cottingham?

3 A Where?

4 Q Yes.

5 A On Match.com.

6 Q You met him online. And how long did you date
7 him before he moved in?

8 A Before he moved in?

9 Q Uh-huh. Or before you moved in with him.

10 A I moved in with him -- I think we dated three
11 years, and then I moved in with him so Logan can go to
12 school.

13 Q Pardon?

14 A So Logan can go to school in Highland Park.

15 Q Well, didn't you live with him somewhere else
16 before you moved to Highland Park?

17 A Yes.

18 Q So you didn't move in with him -- you didn't
19 move in with him for the first time in Highland Park.
20 Where did you first move in with him?

21 A At 2929 Wycliff.

22 Q So that wasn't Highland Park, was it?

23 A No.

24 Q And when did you move in Wycliff with him?

25 A It was when we were trying to get Logan, so

1 it's been two years ago.

2 Q Now, Mr. Cottingham has had one hip
3 replacement and is going to have to have another one;
4 isn't that true?

5 A Maybe.

6 Q So you were talking about in your answers to
7 interrogatories, I believe, the things that you do with
8 Lauriston, IV, and you said you enjoy riding bicycles
9 and skating and all of that. When is the last time you
10 rode a bicycle with him?

11 A When did we get that bike? I got him a bike
12 for his birthday in April, so this last summer.

13 Q You rode bikes with him? You got on a bike
14 and you rode too?

15 A Yes.

16 Q Where?

17 A Just around Highland Park.

18 Q And this was before your back surgery?

19 A Yes.

20 Q Do you have a bike?

21 A Yes.

22 Q And when is the last time you went skating
23 with him?

24 A When was the last time? Probably in the
25 summer.

1 (Exhibit No. 13 marked.)

2 Q Show you Depo 13. You've seen this before;
3 have you not?

4 A I have not seen this.

5 Q Huh?

6 A This?

7 Q Yeah. You have not seen that?

8 A No.

9 Q "The complainant was forensically
10 interviewed." The complainant, that would be your son.
11 "And talked about how his mother made him take a bath
12 with his uncle. The complainant did not give details to
13 explain sexual gratification therefore I/O recommends
14 this offense be unfounded."

15 But it didn't unfound the fact that he
16 took a bath with the uncle, did it?

17 A He did not.

18 Q Now --

19 MS. HAYES: Objection to form. Can you
20 ask that question again, Mary, because I don't think she
21 understood you or didn't hear you.

22 MS. MCKNIGHT: Okay.

23 Q It doesn't say -- it says that they couldn't
24 prove sexual gratification, but it doesn't say it was
25 unfounded that he took a bath with him, does it?

1 A Unfounded?

2 Q Look at it again.

3 MS. HAYES: Unfounded means not true.
4 Like, they found it to not be true.

5 A No, he didn't take a bath with him.

6 Q That isn't what it says on the report. It
7 says that he couldn't prove sexual gratification, but it
8 doesn't say he didn't take a bath, does it?

9 A He didn't take a bath with him.

10 MS. HAYES: Listen to her question and
11 just answer her question.

12 Q Can you point out there where it says that
13 they found that your brother did not take a bath with
14 the child?

15 A No.

16 (Exhibit No. 14 marked.)

17 Q Now, here in April, 4/22/2019 at 19:37 hours,
18 police came out and talked to Robert David Cottingham,
19 date of birth, 5/20/1962. You see that? You've got it
20 there.

21 A Yes.

22 Q Here, I'll take that one.

23 MS. HAYES: Oh. Is that your only one?

24 MS. MCKNIGHT: Yeah.

25 MS. HAYES: That's okay. You can keep

1 it.

2 MS. MCKNIGHT: Yeah.

3 Q And Mr. Cottingham and you are reporting there
4 that -- suggesting that and it says that "Nikki white
5 female, was abused physically while married to
6 Mr. Crockett." Well, you were never married to
7 Mr. Crockett, were you?

8 A No.

9 Q And this was the first time you'd ever told a
10 policeman that you'd been abused by him, wasn't it?

11 A Yes.

12 Q And that was, like, years after you had moved
13 out from him?

14 A Not the first time. I told someone after I --

15 Q After you recovered your memory?

16 A Yes.

17 Q Yeah. But this is the first time you had ever
18 suggested, this is in 2019, six years after you've moved
19 out from him, that you say you were sexual -- you were
20 abused -- let's see, what kind of abuse did you have
21 while you were married to him? "Was abused physically.
22 Mr. Cottingham also stated this abuse extended to the
23 juvenile during the previous marriage."

24 And was that the marriage he was
25 referring to between you and Mr. Crockett?

1 A I'm not sure.

2 Q And do you see this next paragraph, "After
3 general conversation about sports, school, siblings the
4 juvenile," that would be your son and Crockett's,
5 Lauriston, IV, "was interviewed. He was asked if he had
6 fun while in his father's custody. The juvenile
7 replied, 'yes.' He was asked if he always felt safe
8 while he was with his father. The juvenile replied,
9 'yes.' Finally, he was asked if his father ever hit,
10 pulled, or hurt him. The juvenile said, 'no.' When
11 asked how the injury occurred he explained he wrecked
12 his bicycle over the weekend, but didn't know if this
13 was the cause."

14 MS. HAYES: Objection to form.

15 Q You've read that; have you not?

16 A Yes.

17 Q Were you present when he was interviewed?

18 A Yes.

19 Q Did you hear him say that to the policeman?

20 A I was there, but he took him to another room.

21 Q Took him privately and talked to him?

22 A Yes.

23 Q "No emergent medical care was apparently
24 needed. He had full mobility and witnessed
25 weight-bearing on injured extremity." But "due to the

1 nature of incident and previous trauma from her late
2 marriage, Mr. Crockett was not available at the time of
3 the report."

4 Did you ever explain to this policeman
5 that you were not married to Mr. Crockett?

6 A No.

7 Q Have you and Mr. Cottingham ever discussed him
8 adopting Lauriston?

9 MS. HAYES: I'm going to object and
10 instruct you not to answer that question.

11 Q Have you ever discussed adopting him? You can
12 answer. She's objected, but you can answer on the
13 record.

14 MS. HAYES: I'm going to instruct her not
15 to answer as to anything that she and her husband spoke
16 about in the context of their marriage.

17 Q Have you ever discussed with anybody
18 Mr. Crockett -- or Mr. Cottingham adopting Lauriston?

19 A No.

20 Q When did you first consider that?

21 A I think when -- if anything happens to
22 Mr. Crockett, I think it's a good idea for
23 Mr. Cottingham to adopt Logan.

24 Q Well, and why did you think something might
25 happen to Mr. Crockett?

1 A Or if anything happens to me. I just -- I
2 don't know. If anything happens.

3 Q If something happened to you, would you want
4 Mr. Crockett's girlfriend to adopt him?

5 A That's up to him.

6 Q But Mr. Crockett, does he have any health
7 problems you're aware of?

8 MS. HAYES: Objection to form.

9 A I don't know.

10 Q Now, back to this verified emergency motion
11 that you took to court and got Mr. Crockett's rights
12 pretty well eliminated, other than -- I want to know
13 about this history of violent retaliation causing
14 serious injury. Other than what you're now claiming his
15 pulling you out of the car, is there any other history
16 of violent retaliation against you?

17 A Against me?

18 Q Yes. Against Respondent. That's you. "He
19 has a history of violent retaliation against you causing
20 serious bodily injury."

21 A Just the accident.

22 Q Pardon?

23 A The accident.

24 Q Well, you've talked about the accident. You
25 say now that he deliberately pulled you out of the car.

1 That's your story today. But, other than that, what
2 history of violent retaliation does he have against you?

3 A You know --

4 Q None?

5 A No. I mean, we -- he was physical. I mean,
6 he -- with me.

7 Q And describe -- tell the Court and jury where
8 he was when he was physical with you. Where were you?

9 A At our apartment a lot of times.

10 Q Was it before or after Lauriston, IV was born?

11 A Before and after.

12 Q And did he do it in front of Lauriston?

13 A That one time, yes, because Lauriston was in
14 the room.

15 Q Where? When?

16 A Because I tried to pick up Lauriston and he
17 pulled Lauriston and he pushed me and hit me, and that's
18 when my mouth was bleeding.

19 Q And did you take pictures of the bleeding
20 mouth?

21 A I did.

22 Q And where did you send them?

23 A To my friend Jackie.

24 Q And does Jackie still have those?

25 A No.

1 MS. HAYES: Objection to form.

2 Q Now, you were talking in your sworn
3 interrogatories here on page 9 at the bottom,
4 "Mr. Crockett has some mental health issues. What he
5 does to a child is a form of child abuse that involves
6 exaggeration or fabrication."

7 Do you exaggerate and fabricate things,
8 Ms. Ngo?

9 A No.

10 Q And you consider yourself a truthful,
11 trustworthy individual?

12 A Yes.

13 Q And you say that Mr. Crockett is a hypocrite
14 and has control issues. Now, do you consider that you
15 have control issues --

16 A No.

17 Q -- where you objected and do not want -- did
18 not want Lauriston Crockett to take his son to dinner
19 and to Christmas Eve mass?

20 A We're letting him.

21 Q You're letting him? You did try to stop it,
22 didn't you?

23 MS. HAYES: Objection to form.

24 Q Now, didn't you get in touch with Ms. Ritzi
25 and tell her that you were trying to find out if

1 Ms. Alexander would supervise them at her office? You
2 thought that would be better?

3 A Yes.

4 Q Why do you think it would be better at her
5 office than to go to dinner and to go to mass?

6 A No, I meant at her office, not at his house.

7 Q No, but you wanted them to be in a sterile
8 atmosphere of an office, not at a church or not at his
9 house.

10 A I didn't -- you know, that was the first thing
11 that -- that didn't come up, at a church. None of that
12 came up. It was either at his house or somewhere else,
13 and I wanted a place where it was neutral, and I thought
14 maybe her office would be good because we met her there.

15 (Exhibit No. 15 marked.)

16 Q Well, now, Ms. Ngo, that day, on April the
17 23rd, you were trying -- you were trying so hard on that
18 date to document an abuse allegation against
19 Mr. Crockett, weren't you?

20 A Yes.

21 Q Why did you want to document an abuse
22 allegation against Mr. Crockett?

23 A Because it's something that I need to do.

24 Q Something you needed to do? And have you ever
25 considered filing to terminate his parental rights?

1 A I never considered that.

2 Q Pardon?

3 A I've never considered that.

4 Q You have stated in your interrogatory answers
5 and in your writings for Ms. Frenkle that you had never
6 seen Mr. Crockett strike or abuse your son.

7 A I've never seen it.

8 Q How late -- was this a Saturday night or a
9 Sunday night when you were trying to build this case of
10 abuse on Mr. Crockett?

11 MS. HAYES: Objection to form.

12 A I don't remember.

13 Q It was a weeknight, so it was Tuesday night.

14 A Yes.

15 Q And how late was -- were you out when you were
16 at the -- going from Plano -- I mean from Medical City
17 Plano and from Highland Park and Richardson -- went from
18 Richardson to Highland Park to Plano and to the
19 different ERs, how late were you out with that child?

20 A I don't remember.

21 Q Now, are you familiar with an allegation that
22 Mr. Lauriston Crockett, III was stalking Ms. Ritzi's
23 office?

24 A Yes.

25 Q What do you know about that?

1 A You know, I just heard it in court.

2 Q And what did you hear in court? Did you hear
3 Ms. Ritzi testify that he was at her office wearing
4 sunglasses and a baseball cap?

5 A Yes.

6 Q Stalking in the hallways?

7 MS. HAYES: Objection to form.

8 A I didn't hear that.

9 Q But you did hear her testify that he was in
10 her office?

11 A I believe she said -- I think the amicus asked
12 her about it and she said yes, but I don't remember her
13 saying anything. I think the amicus asked her "Was
14 Mr. Crockett -- do you believe Mr. Crockett was in your
15 office wearing a baseball cap?" And Ritzi, I think,
16 says, "Yes."

17 Q Did she say she saw it?

18 A I don't remember.

19 Q Do you know if she was even in the country at
20 the time?

21 A I don't remember.

22 Q Now, you said that this child is so frightened
23 at your home that he can't sleep by himself?

24 A Yes.

25 Q And, yet, in your sworn interrogatory answers

1 here on page 18, "Logan is a happy-go-lucky, carefree
2 kid when he's with me. Rob and I set up healthy play
3 dates. I think to get Lauriston and I to agree on a
4 course for the child is an act of futility. Someone
5 needs to be able to do it alone."

6 And so you're saying that you should be
7 the sole parent, right?

8 A Yes.

9 Q You don't think he needs a daddy? You just
10 don't want him to have the daddy that gave him life, do
11 you?

12 A He's not good for him.

13 Q He's not good for him. Are you good for him?

14 A Yes.

15 Q When is -- you had asked in this reasons why
16 rob -- reasons why Lauriston Crockett, III is an unfit
17 parent, you had said how long is he going to keep
18 sleeping with him; till he's 10 or 12 or 14? I will ask
19 you that. How long do you plan to keep sleeping with
20 your son?

21 A I'm hoping that court will be done and, you
22 know, we can -- when Logan is less stressed and . . .

23 Q Well, he's stressed right now with the
24 supervised visits, isn't he?

25 MS. HAYES: Objection to form.

1 Q Don't you think the supervised visits are
2 stressful for him?

3 A I think he's fine now.

4 Q You think he's fine? And you, as his mother,
5 would like to see this supervision go on until he's 15?

6 A Yes.

7 Q Till he's 15 years old go and sit at Hannah's
8 House or some other institution with people writing down
9 everything that is said?

10 A (Witness nods affirmatively.)

11 Q You're nodding your head. That is what you
12 want for your son?

13 A Yes.

14 Q Well, would you want it for yourself if the
15 jury feels that Mr. Crockett should be sole managing
16 conservator?

17 A If that's how they feel.

18 Q And would you go there, though? Would you
19 actually go there and sit like he does and entertain
20 Crockett and bring him snacks?

21 A If that's what I have to do.

22 Q You delegate your parenting, don't you?

23 A I delegate?

24 Q Yes. You delegate to Mr. Cottingham a lot of
25 your parental duties, don't you?

1 A No.

2 Q But you like the control, do you not, Ms. Ngo?

3 A No.

4 Q And why haven't you -- if you think that what
5 he says and what he does with his son and your son is so
6 inappropriate, why have you not read these several
7 hundred pages of notes to see what goes on?

8 A We have not gotten -- you mean the Hanna's
9 House?

10 Q Have you even read all of these?

11 A I've read some of them.

12 Q Why would you not read them, if you're
13 interested in your son and you want to know what's
14 happening between him and his father?

15 A We haven't gotten all of it.

16 Q Well, but you haven't read any of it, have
17 you?

18 A I've read some of it.

19 Q Which ones have you read?

20 A The first one that we got where it says, you
21 know, they play football and --

22 Q Football?

23 A Mainly discuss about football.

24 Q Football? And that's all you know about is
25 football?

1 MS. HAYES: Objection to form.

2 (Exhibit No. 17 marked.)

3 Q Let's see, this is No. 17. Down just below
4 the middle of the page there on the first page there,
5 "Lauriston told Dad he was with his stepfather skiing
6 down the mountain. The stepfather went left. Lauriston
7 thought he was going left. Lauriston went right and got
8 lost. They had to find the ski patrol and wait until
9 his stepfather found him."

10 And you know nothing about that?

11 A No.

12 Q Is that something that Lauriston made up?

13 A I don't know.

14 Q Well, have you -- did Mr. Cottingham say
15 anything to you about losing your son?

16 A No.

17 Q Do you think that's something that a
18 responsible caretaker would mention if it happened?

19 MS. HAYES: Objection to form.

20 Q And the ones you read, did you see how
21 Lauriston would run to his dad and then fall asleep on
22 his dad's lap and come back for four more kisses because
23 he didn't want to leave? Have you read any of these?

24 A Yes.

25 MS. HAYES: Objection to form.

1 Q Do you think about what you are depriving this
2 little boy of by playing this game, Ms. Ngo?

3 MS. HAYES: Objection to form.

4 You need not answer that question.

5 Q And if you read these, you would see Lauriston
6 refers to your home as the apartment and Mr. Crockett's
7 home as his house?

8 A Yes.

9 Q You knew that, didn't you?

10 A Yes.

11 Q You read that?

12 A Yes.

13 Q And he wanted to know -- he asked his dad "Has
14 anything changed in my room?" Said, "Nothing has
15 changed. I've closed the door."

16 Do you think -- how does that make you
17 feel as the mother to know that he wants to see his room
18 and know if anything has changed in it?

19 A I didn't think anything of it.

20 Q You didn't think anything of it. You didn't
21 want him to go there at Christmas and see his room, did
22 you?

23 A No.

24 Q Because you knew he would want to stay there,
25 didn't you?

1 A I just -- no. I think he'll regress.

2 Q Regress? Now, is your goal never for him to
3 be back at his father's house normally? Is that your
4 goal?

5 A Yes.

6 Q And he is now seven years old?

7 A Eight.

8 Q Eight years old, and that is your goal?

9 A Yes.

10 Q Has that always been your goal?

11 A No.

12 Q When did that become your goal, Ms. Ngo?

13 A When he took me back to court and he wanted
14 full custody.

15 Q When he took you back to court, you decided he
16 had to go?

17 A Yep.

18 Q "Yes"?

19 A Yes.

20 Q When he took me to court. When he took you
21 back to court, you decided that Lauriston Crockett, III
22 had to leave his son's life?

23 A Yes.

24 Q By any means possible?

25 MS. HAYES: Objection to form.

1 Q Right?

2 A Yes.

3 MS. HAYES: How much longer do you have,
4 Mary? I need to take a restroom break.

5 MS. MCKNIGHT: Okay. Let's take a break
6 and I'll see what we've got here.

7 (A break was taken from 3:45 p.m. to 3:56 p.m.)

8 (Exhibit No. 19 marked.)

9 Q Now, I think these are the ones that you did
10 find. NG, that would be you. So I'll give you
11 Deposition Exhibit 19 and ask you if you read all of
12 those?

13 A Yes.

14 Q And here on 10/15 where Lauriston says "Mom
15 says you're a pig. Dad says actually -- Dad says well,
16 actually, the sign is a boar, b-o-a-r. Lauriston
17 smiles. But we're a ram, Lauriston says."

18 Did you tell him his dad was a pig?

19 A He was born in the year of the pig.

20 Q It's the boar, I believe, b-o-a-r. But you
21 told him his dad was a pig?

22 A Born the year of the pig.

23 Q Okay. And so you read this, and here on
24 10/17, "Lauriston lays down in Dad's lap. Lauriston
25 asked him to take his cookies home. Lauriston begins to

1 cry about not being with Dad. Dad rubs his head and
2 says, 'Everything will work out.'" Did you read that?

3 A Yes.

4 Q And you thought "Oh, well"?

5 MS. HAYES: Objection to form.

6 Q Did it bother you that he was crying about not
7 being able to be with his dad?

8 A It did.

9 Q Well -- but, still, you want him to just get
10 over it, right, and you have no plan or no hopes for
11 having a normal sharing or parenting?

12 A We did.

13 Q You have no intention of it, do you, because
14 he filed a lawsuit and you marked him for destruction?

15 A He filed --

16 Q Fair enough?

17 A -- multiple CPS report. He's a danger to
18 Logan.

19 Q And you're not?

20 A No.

21 Q Do you know what -- do you consider what
22 you're doing the -- is the ultimate alienation where you
23 are actually keeping him from his son?

24 MS. HAYES: Objection to form.

25 A No.

1 Q Here on 10/17, "At the end, they sit on the
2 couch hugging. Dad says, 'I love you. It'll all work
3 out.' The little boy runs back to Dad several times to
4 hug him. He also waves to Dad from the hallway."

5 Does that sound like a child who's afraid
6 of his father?

7 A He doesn't know any better.

8 Q And you're still saying -- you know, it's like
9 the drunk with a hammock, he's afraid of his father,
10 that's your story and you're sticking to it; is that
11 right?

12 A Yes.

13 Q Now, if you should find yourself relegated to
14 supervised visitation at Hannah's House, would you show
15 up each time and sit there and go through this?

16 A Yes.

17 Q Just to be with your son?

18 A Yes.

19 Q And you wouldn't send Mr. Covington -- or
20 Cottingham?

21 MS. HAYES: Cottingham.

22 Q Cottingham. You wouldn't send him in your
23 place?

24 A No. I would hope we'd go together.

25 Q But you did read this and it did not change

1 your perspective at all?

2 A Perspective in?

3 Q Wanting to keep him out of his son's life, get
4 him out of his son's life?

5 A He's a danger to my son.

6 Q He's dangerous. And tell me what he has done
7 that is dangerous.

8 A Well, he takes him to CPS and make all these
9 false allegations --

10 Q Well, now --

11 A -- have my son lie. He physically and
12 emotionally abuse him.

13 Q Physically and emotionally. Now, see, you've
14 made charges that he physically abused him. Is that a
15 lie?

16 A No.

17 Q Was it -- did CPS find that he physically
18 abused this child?

19 A No.

20 Q Did the police find that he physically abused
21 this child?

22 A The Highland Park Police told us to go report
23 it.

24 Q Based on the horrific marriage you had had to
25 Mr. -- that you reported and Mr. Cottingham reported

1 that you had had to Mr. Crockett. They did not make any
2 findings and they did not report it to CPS, did they?

3 A No. But they told --

4 Q Just no. They didn't, did they?

5 A No.

6 Q And Plano didn't either, did they?

7 A No.

8 Q So are you a danger to your son because you
9 and Mr. Cottingham were spending a whole day and night
10 there trying to set up an abuse case against
11 Mr. Crockett?

12 A No.

13 MS. HAYES: Objection to form.

14 Q Have you discussed testifying in court with
15 Dr. Boelter?

16 A Yes.

17 Q And how much does she charge for testifying?

18 A I don't know. I mean, I didn't, like, talk to
19 her. I mean, we just discuss about if she ever gets --
20 it's just general, if she ever gets to testify --

21 Q Ever gets subpoenaed to court?

22 A Yes.

23 Q And does she say she testifies in court?

24 A Yes.

25 Q And is she a specialist in recovered memories?

1 A I don't know.

2 MS. HAYES: Objection to form.

3 Q Who referred you to her?

4 A You know, I don't remember who referred me to
5 her.

6 Q Now, you claimed that you had been -- had a
7 common-law marriage with Mr. Crockett; did you not?

8 A Yes.

9 Q Was that heard by the Court?

10 A I don't think so.

11 Q Did anybody find there to be a common-law
12 marriage?

13 A I don't believe.

14 MS. HAYES: Objection to form.

15 Q And you claimed an interest in his business as
16 well, didn't you?

17 A Yes.

18 Q Did anyone find that you had an interest in
19 his business?

20 A I think we didn't go to court for it.

21 Q Now, Mr. Crockett says what you wanted as far
22 as marriage, you wanted a \$25,000 ring and a \$500,000
23 house and 7,000 a month to live on. Is that what you
24 wanted?

25 A No.

1 Q Never made a demand for that?

2 A I don't believe so.

3 Q Didn't you write a letter to him and tell him
4 how things were going to be?

5 MS. HAYES: Objection to form.

6 Q Now, Mr. Crockett has suggested -- or
7 Mr. Cottingham has suggested to you that we need to
8 punish Lauriston for lying?

9 A Yes.

10 Q And how has he suggested that you punish him
11 for lying?

12 A I don't remember that.

13 Q We need to punish him for lying.

14 Now, you said that -- you told people too
15 that Mr. Crockett is a conman and he's been sued and had
16 to pay a five-figure settlement to someone. Do you
17 remember saying that?

18 A I remember saying that, but I don't remember
19 the five-figure settlement.

20 Q You don't remember saying that? Well, you
21 did. And who did he sue that he had to pay a settlement
22 to?

23 A It was a company that he was trying to get
24 them to buy his company.

25 Q And your testimony is that he had to pay a

1 settlement to them?

2 A Yes.

3 Q And have you ever seen any documents regarding
4 that?

5 A No.

6 Q But you would represent to people under oath
7 in court documents that this was true?

8 A Yes.

9 Q Without seeing anything and without knowing
10 anything?

11 A I've just seen the paperwork that he got sued.

12 Q When did you start being afraid of
13 Mr. Crockett?

14 A Well, I've always been afraid of him.

15 Q You've always been afraid of him. Why in the
16 world would you move in with him, get pregnant three
17 times? Did you do it for money?

18 A No.

19 Q Well, you wanted a million dollar life
20 insurance policy on him.

21 A For my son. After we have our son.

22 Q A million dollar life insurance policy and a
23 big trust.

24 A For my son.

25 Q Now, you make a lot of representations about

1 the father. You said the father did not finish high
2 school. Is that your belief?

3 A That's what he told me.

4 Q You told him you had graduated from college,
5 didn't you?

6 A No.

7 Q And he said, "Well, let's put your diploma up
8 on the wall." Do you remember that?

9 A No. I never said that.

10 Q And you said, "Who does that?" You didn't
11 tell him you had finished college?

12 A No.

13 Q Why would you say he has not finished high
14 school?

15 A Because he told me.

16 Q And when did he tell you that?

17 A When we were together.

18 Q Do you know if he ever attended college?

19 A He told me that he did.

20 Q That he attended college?

21 A He told me.

22 Q But he never finished high school but he
23 attended college?

24 A Yes. Because he said he got a -- what do you
25 call that?

1 Q A GED?

2 A GED, yes.

3 Q And what other people -- you're alleging here
4 that Mr. Crockett screams. Who else has seen him
5 scream?

6 MS. HAYES: Objection to form.

7 Q What other witnesses do you have that have
8 seen Mr. Crockett scream?

9 A His mom, his sister, Rob, Logan.

10 Q Now, you've alleged that he's trying to prove
11 you unfit. You made that allegation here.

12 A Yes.

13 Q And you have filed a document claiming he's
14 unfit and gave it to Jennifer Frenkle, didn't you?

15 A Yes.

16 Q And it contains diagnoses of everything from
17 Munchausen's by proxy to agoraphobia that you have
18 diagnosed, doesn't it?

19 A Dr. Seigel diagnosed him with agoraphobia.

20 Q And Dr. Seigel, you've read his affidavit,
21 have you not, the one he gave this year?

22 A Yes.

23 Q Dr. Seigel thinks you're lying about your
24 recovered memory. You read that, didn't you?

25 A No.

1 MS. HAYES: Objection to form.

2 A He didn't say that.

3 Q Well, let's find his affidavit and see what he
4 said.

5 Have you ever OD'd on anything, Ms. Ngo?

6 A No.

7 Q Did you tell your nanny that you'd almost OD'd
8 on cold meds -- cold sore meds?

9 MS. HAYES: Objection to form.

10 A No.

11 Q Now, what you told Deborah Boelter back in
12 2018 was that Mr. Crockett grabbed you by the arm, took
13 your joint checkbook away from you and slammed you into
14 the wall. Did you have a joint checkbook?

15 A No.

16 Q You didn't have a joint checking account?

17 A No.

18 Q So that was a false statement?

19 A I don't -- I just -- I think she just think
20 that because I said I was trying to get his checkbook.

21 Q You told her that you and he had a common-law
22 marriage, didn't you?

23 A Right.

24 Q And you said took their joint checkbook away
25 from her and slammed her into the wall. She could not

1 use their combined money to hire an attorney. She then
2 grabbed her keys and ran away from him into the garage
3 for her car. As she was backing out to the driveway, he
4 opened the car door and pulled her out of the moving
5 car.

6 Well, when you were run over, were you
7 still in the garage?

8 A I don't know.

9 Q Weren't you out in the driveway in the car way
10 back against the fence at the end of the alley?

11 A I don't know.

12 Q And when you were in the hospital for 25 days
13 and had a punctured lung and a shattered pelvis and lost
14 a kidney and then in a wheelchair for 90 days, who took
15 care of little Lauriston, IV?

16 A My family and Mr. Crockett.

17 Q Mr. Crockett took care of him, along with the
18 nanny, didn't he?

19 A Not all the time.

20 Q Your family -- he stayed right there in that
21 house and Marilee helped him and they took care of that
22 child?

23 A Not for 90 days, no.

24 Q Now, if your mother is asked, what time will
25 she say she took care of the child?

1 MS. HAYES: Objection to form.

2 Q Your mother doesn't lie, does she?

3 A No.

4 Q What time period did she -- did your mother
5 take care of little Lauriston, IV?

6 A When I gave birth to Logan --

7 Q Pardon?

8 A When I gave birth to Logan, she came out and
9 helped us for, I'm not sure, two to four weeks.

10 Q Here's what I was looking for.

11 (Exhibit No. 9 marked.)

12 Q Do you recognize this letter that you wrote to
13 Mr. Crockett discussing the finances that you expected?

14 MS. HAYES: I'm going to object to form.
15 And there's no date on this, but I'm going to assume
16 this is beyond the prior order.

17 So you can answer what questions she has.

18 Q And you were -- there on page 2, you were
19 telling him to move out and go find him a small
20 apartment?

21 MS. HAYES: Objection to form.

22 Q And you don't need a three-bedroom apartment.

23 MS. HAYES: Objection to form.

24 Q And Logan's only going to be with you every
25 other weekend.

1 MS. HAYES: Objection to form.

2 I'm going to go ahead and run a -- lodge
3 a running objection as to every question dealing with
4 this letter.

5 MS. MCKNIGHT: Okay. You can do it.

6 MS. HAYES: Thanks.

7 Q And you said, "I truly want the best for all
8 of us, especially Logan. I want you to be happy. I'm
9 sorry I can't fill that void for you. I hope you will
10 meet someone that will treat you the way you want to be
11 treated. I know this is the best solution."

12 And you're telling him when he can see
13 Logan and when he can't. "And I ask that you still get
14 the one million dollar life insurance policy."

15 That's in there, isn't it?

16 A Yes.

17 Q And there on this page when you're saying what
18 the financial needs are, you want three more months of
19 \$1,000 a month and 5,627 in your monthly expenses and
20 he's to live on \$2,819 a month. You had figured that
21 out.

22 MS. HAYES: Object as to form.

23 Q Who helped you with those figures?

24 A You know, this is so long ago, I don't
25 remember. I'm sure it was just me.

1 Q But money was a very big factor, wasn't it,
2 Ms. Ngo?

3 MS. HAYES: Object as to form.

4 Q And even Ms. Frendle, one of the things she
5 was disturbed about you in her report was your
6 preoccupation with money. Do you remember reading that?

7 A No.

8 Q And your negative attitude toward the father
9 that she felt you were taking too far. Do you remember
10 that?

11 A I know I wanted the trust money for him and
12 the life insurance for my son. I don't know why that
13 would be -- that would be important for my son's life to
14 secure his future.

15 Q Well, you've got a husband now. You want the
16 father out of his life. You want the father out of his
17 life but you still wanted the million dollar life
18 insurance policy. Does that seem fair?

19 I'm looking for Dr. Seigel's. And you've
20 seen the business records affidavit from Forest
21 McFarland, I'm sure. It's been on file with the Court.
22 Are you familiar with that?

23 A I am.

24 Q Are you?

25 A I am.

1 Q Okay. August 2019. And is it your contention
2 that Mr. Crockett is -- suffers from agoraphobia and
3 doesn't have an ear dysfunction that causes him to have
4 motion sickness?

5 A Ear?

6 Q An ear dysfunction.

7 A I'm not aware of that.

8 Q You're not familiar with that?

9 A No.

10 Q Back from 2016? I may not have brought
11 Dr. Seigel's affidavit. So you're not familiar with his
12 affidavit?

13 A I am familiar with it. I think it says
14 something like if a parent said this, something
15 that's -- but I'm familiar with it.

16 Q And basically he did not believe your
17 recovered memory and thought the fact that you would
18 bring this up at this point, he did not find that to --
19 he did not feel you were trustworthy as a parent?

20 MS. HAYES: Objection to form.

21 A That's not what it says.

22 Q Pardon?

23 A I don't remember that's what it said.

24 Q Well, we'll find it and Dr. Seigel will be
25 available, I'm sure, for trial.

1 But has your son shared with you that he
2 doesn't have many friends at his new school and that the
3 other children think he's weird?

4 A No.

5 Q Do you remove all of the child's belongings
6 brought with him from the father's house? Did you --
7 when he would bring things from the father's house, did
8 you take them away from him?

9 A No.

10 Q I'm reading here on page 30 of Ms. Frenkle's
11 report. She says "The father's former nanny described
12 things the child told her about the mother's home. She
13 said Lauriston told her the mother removed all the
14 child's belongings brought with him from the father's
15 home. She stated it broke my heart when he told me
16 about the interactions with the mother and her family."

17 So the nanny is lying there about what he
18 said?

19 A Yes.

20 Q "And the mother, like the father, places the
21 child in the middle of the parental conflict with her
22 actions." Do you believe you do that?

23 A No.

24 Q "And in her attempts to protect the child from
25 the father's influence, the mother seems to go too far

1 in the other direction in extreme of limiting the
2 father's access in her home such as the telephone and
3 Skype contact. This gives the child a strongly negative
4 message about the mother's feelings toward the father,
5 which is damaging to the child, but has also placed the
6 mother in a situation where she is not following court
7 orders."

8 MS. HAYES: Objection, form.

9 Mary, can you tell me what you're reading
10 from?

11 MS. MCKNIGHT: I'm reading from Frendle's
12 report, page 31.

13 MS. HAYES: Okay. Thank you.

14 MS. MCKNIGHT: Sure am. 30 and 31.

15 Q The mother, remaining concerns about you were
16 limiting the child's contact with the father,
17 stepfather's defensive behaviors and focus on money.

18 MS. HAYES: Objection to form.

19 Q Well, do you see anything wrong with the way
20 you're behaving as a parent, Ms. Ngo?

21 A No.

22 Q Do you intend to continue parenting the way
23 that you are here now?

24 A Yes.

25 Q You have no intention of changing your

1 attitude toward Mr. Crockett or his relationship with
2 his son?

3 A He's a danger to Logan.

4 Q Okay.

5 MS. MCKNIGHT: Well, I think that will
6 wind us up for right now.

7 MS. HAYES: Thank you.

8

9 (Proceedings concluded at 4:32 p.m.)

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1 CHANGES AND SIGNATURE

2 WITNESS: NIKKI NGO DATE: DECEMBER 17, 2019

3 PAGE LINE CHANGE REASON

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1 _____

2 _____

3 I, NIKKI NGO, have read the foregoing deposition
4 and hereby affix my signature that same is true and
5 correct, except as noted above.

6

7

8

NIKKI NGO

9

THE STATE OF _____)

10

COUNTY OF _____)

11

12

Before me, _____, on this

13

day personally appeared NIKKI NGO, known to me or proved

14

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 _____, _____.

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23

NOTARY PUBLIC IN AND FOR

24

THE STATE OF _____

25

My Commission Expires: _____

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CAUSE NO. DF-13-06713

IN THE INTEREST OF) IN THE DISTRICT COURT
)
)
L.L.C. IV) DALLAS COUNTY, TEXAS
)
)
A CHILD) 256TH JUDICIAL DISTRICT

REPORTER'S CERTIFICATE
ORAL DEPOSITION OF NIKKI NGO
DECEMBER 17, 2019

I, Christy Fagan, CSR, CRR, RMR, RPR, TMR, CLR,
Certified Shorthand Reporter in and for the State of
Texas, hereby certify to the following:

That the witness, NIKKI NGO, was duly sworn and that
the transcript of the deposition is a true record of the
testimony given by the witness;

That the deposition transcript was duly submitted
on _____ to Ms. Kris Balekian
Hayes, Balekian Hayes, PLLC, 4144 N. Central Expressway,
Suite 1200, Dallas, Texas 75204 for examination,
signature, and 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:

1 Ms. Mary McKnight (2 hours 47 minutes)
Attorney for the Petitioner
2 Ms. Kris Balekian Hayes (0 hours 0 minutes)
Attorney for the Respondent
3

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

9 Further certification requirements pursuant to Rule
10 203 of the Texas Rules of Civil Procedure will be
11 complied with after they have occurred.

12 Certified to by me on this 21st day of December,
13 2019.

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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
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FURTHER CERTIFICATION UNDER TRCP RULE 203

The original deposition __was __was not returned to the deposition officer on (or by)_____.

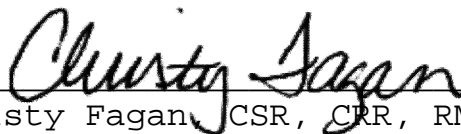
If returned, the attached Changes and Signature page(s) contain(s) any changes and the reasons therefor.

If returned, the original deposition was delivered to Ms. Mary McKnight, Custodial Attorney.

\$_____ is the deposition officer's charges to the Petitioner for preparing the original deposition and any copies of exhibits;

The deposition was delivered in accordance with Rule 203.3, and a copy of this certificate, served on all parties shown herein, was filed with the Clerk.

Certified to by me on this _____ day of _____, _____.



Christy Fagan, CSR, CRR, RMR, RPR, TMR, CLR
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