



Transcript of the Testimony of **Robert Cottingham**

**Date:** February 21, 2020

**Case:** In the Interest of L.L.C. IV A Child

Legal Solutions Court Reporting

Reporter: Wendy Golding

Phone: (866) 830-1717

Fax: (866) 651-4292

**Schedule Next Depo:**

**[http://legalsolutionscourtreporting.com/contact\\_us](http://legalsolutionscourtreporting.com/contact_us)**

Internet: [www.LegalSolutionsCourtReporting.com](http://www.LegalSolutionsCourtReporting.com)

Reporter-owned and operated firm since 2004

Christy Fagan, CSR, CRR, CMR, RMR, TMR, RPR - DFW reporter since 1992

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

NO. DF-13-06713

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

-----  
ORAL AND VIDEOTAPED DEPOSITION OF  
ROBERT COTTINGHAM  
February 21, 2020  
-----

ORAL AND VIDEOTAPED DEPOSITION OF  
ROBERT COTTINGHAM, produced as a witness at the instance  
of the Petitioner, and duly sworn, was taken in the  
above-styled and numbered cause on February 21, 2020,  
from 10:10 a.m. to 2:31 p.m., before Wendy Golding, CSR  
in and for the State of Texas, reported by machine  
shorthand, at the law offices of Balekian Hayes, PLLC,  
4144 North Central Expressway, Suite 1200, Dallas, Texas  
75204, pursuant to the Texas Rules of Civil Procedure.

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

A P P E A R A N C E S

FOR THE PETITIONER:

MARY D. McKNIGHT  
The Law Office of Mary D. McKnight, P.C.  
2620 State Street  
Dallas, Texas 75204  
214-871-9590  
mdm@hardfamilylaw.com

FOR THE RESPONDENT:

KRIS BALEKIAN HAYES  
Balekian Hayes, PLLC  
4144 North Central Expressway, Suite 1200  
Dallas, Texas 75204  
214-828-2800  
kris@bh-pllc.com

The Videographer:  
Rick Bell

Also present:  
Andrea Ferrell

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

INDEX

PAGE

Appearances..... 2

ROBERT COTTINGHAM

EXAMINATION BY MS. McKNIGHT..... 5

Signature and Changes..... 145

Reporter's Certificate..... 147

EXHIBITS

NO. DESCRIPTION PAGE

1 Dallas County Family Court Services  
Division records..... 8

2 Underdog Kennels' documents..... 24

3 Emails chain..... 46

4 Email..... 47

5 Two-page email..... 5

6 Highland Park Police Department records.. 5

7 (Not marked/misnumbered).....

8 Dallas County Domestic Relations records. 5

9 Medical City Plano ER records..... 21

10 Motion to Dismiss..... 40

11 Email string..... 50

12 LinkedIn profile of Robert Cottingham.... 134

1	13	Email from Rob Cottingham to	
2		Lauriston Crockett III.....	87
3	14	Email from Rob Cottingham to	
4		Lauriston Crockett III.....	63
5	15	Photograph.....	63
6	16	Email from Rob Cottingham to	
7		Lauriston Crockett III.....	84
8	17	Email from Rochelle Ritzi to Nikki Ngo..	68
9	18	Email from Rob Cottingham to	
10		Rochelle Ritzi.....	68
11	19	(Marked/not attached).....	68
12	20	Medical City Plano record.....	73
13	21	Email from Rochelle Ritzi to	
14		Rob Cottingham.....	85
15	22	Photograph.....	93
16	23	Email from Rochelle Ritzi to	
17		Rob Cottingham.....	94
18	24	Photograph.....	131
19	25	Email with photograph.....	131
20	26	Email from Nikki Ngo Cottingham to	
21		Lauriston Crockett III.....	131
22			
23			
24			
25			

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

2 (EXHIBIT NOS. 1 THROUGH 6 and NO. 8 WERE MARKED)

3 THE VIDEOGRAPHER: We are on the record at  
4 10:10 a.m.

5 Today's date is February 21, 2020. This is  
6 the oral and video-recorded deposition of Robert  
7 Cottingham and beginning of video one.

8 Would counsel please state their appearance  
9 for the record.

10 MS. MCKNIGHT: Mary McKnight. I am for  
11 Laurenston {verbatim} Crockett III.

12 MS. HAYES: My name is Kris Hayes. I  
13 represent Nikki Ngo.

14 THE VIDEOGRAPHER: Thank you. Would the  
15 court reporter please swear in the witness.

16 ROBERT COTTINGHAM,  
17 having been first duly sworn, testified as follows:

18 EXAMINATION

19 Q. (By Ms. McKnight) Sir, would you state your  
20 full name for the record, please.

21 A. Robert David Cottingham.

22 Q. And, Mr. Cottingham, have you ever had your  
23 deposition taken before?

24 A. Yes.

25 Q. Okay. And how recently?

1 A. Maybe 1982.

2 Q. So it wasn't anything recent?

3 A. No. That's correct.

4 Q. And have you ever been a party to a lawsuit?

5 A. Yes.

6 Q. And when was that?

7 A. That was maybe 2011.

8 Q. Okay. And what sort of lawsuit was it?

9 A. It was a car accident.

10 Q. And was it in Dallas County?

11 A. No.

12 Q. And were you the plaintiff or the defendant?

13 A. The plaintiff.

14 Q. And other than that car accident and something

15 -- a deposition in 1982, you've not been a party to a

16 lawsuit?

17 A. I don't believe so. Oh, yeah, thank you.

18 Sorry. Yes, I was, actually. I was a party to a

19 lawsuit. I was a defendant in a case with Genostim.

20 Q. Okay. And how long ago was that?

21 A. Approximately two years ago.

22 Q. Okay. And is that resolved at this time?

23 A. Yes, it is.

24 Q. Okay.

25 A. They -- yeah.

1 Q. And you are presently married to Nikki Ngo  
2 Nottingham {verbatim}?

3 A. Nikki Ngo Cottingham.

4 Q. Cottingham, yes.

5 A. Yes.

6 Q. And I'm going to -- you have -- where did you  
7 first meet Ms. Ngo?

8 A. Where or when?

9 Q. When?

10 A. October 9, 2014.

11 Q. And how did you meet her?

12 A. We met on Match.com.

13 Q. And did you contact her, or did she contact  
14 you?

15 A. She contacted me.

16 Q. How long had you been on Match?

17 A. I'm not sure.

18 Q. Well, was it a few weeks?

19 A. No, it was longer than that. Probably over a  
20 year.

21 Q. Over a year?

22 A. Sure. Actually probably a couple of years.

23 Q. Okay. And then you and she subsequently began  
24 living together; is that correct?

25 A. Years later.



1 Q. How much later?

2 A. Three years.

3 Q. In 2017?

4 A. Yes.

5 Q. And then you got married in 2018; is that  
6 correct?

7 A. That's correct.

8 Q. And -- and you participated in a social study  
9 in the case that is going on now between Nikki and  
10 Mr. Crockett, did you not?

11 A. Yes.

12 Q. And I'll show you what has been marked as  
13 Exhibit -- Deposition Exhibit No. 1 and ask you if  
14 you're familiar with those documents attached there.

15 First of all, is that your writing on the  
16 front?

17 A. Yes, it is.

18 Q. And at that time, which it looks like that was  
19 turned in May of 2018, you were still a boyfriend to --  
20 at the time you completed this, you were just Ms. Ngo's  
21 boyfriend; is that correct?

22 A. That's correct.

23 Q. And these documents that are attached, the  
24 family violence questionnaire and the questionnaire --  
25 the personal history questionnaire, all of these things

1 are in your own handwriting; is that correct?

2                               Go ahead and take a moment and look it  
3 over.

4           A. Can you repeat that question, please?

5           Q. The handwriting here on page -- well, it's not  
6 numbered. But on the family violence questionnaire, are  
7 those notations and the printing there done by you?

8           A. Yes, they are.

9           Q. Okay. And the next page, personal history  
10 questionnaire, did you fill that out?

11          A. Yes, I did.

12          Q. And on to the next page, your employment  
13 history, did you complete that?

14          A. Yes, I did.

15          Q. And your income information, is that  
16 information that was supplied by you?

17          A. Yes.

18          Q. And your educational history on the next page,  
19 that was provided by you as well; is that correct?

20          A. Correct.

21          Q. And then on to the portion of the packet that  
22 is typewritten, "How has the present court action  
23 affected the children," is that typing done by you, that  
24 information? It's a few pages over.

25          A. Yes.

1 Q. That is information you provided?

2 A. Yes, I believe so, uh-huh.

3 Q. On that page. And on to the next page as well.

4 A. Uh-huh.

5 MS. HAYES: You have to say yes or no out  
6 loud.

7 A. Yes.

8 Q. And then the other -- the next page, that  
9 continues, "Describe yourself as a parent focusing on  
10 your strengths," is that yours as well?

11 A. Yes.

12 Q. And then on the next page, the concerns you  
13 have about the other parent or parties of this case, did  
14 you provide that information?

15 A. Yes.

16 Q. And then on to the next page, did you continue  
17 to provide concerns about the other parent on the next  
18 page?

19 A. Yes.

20 Q. And then on the next page, did you continue to  
21 present concerns about the other parent?

22 A. Yes.

23 Q. And the next page, did you continue to present  
24 concerns about the other parent?

25 A. Yes.

1 Q. And then on -- looks like about the seventh  
2 page, did you continue to present concerns about the  
3 other parent?

4 A. Yes, I did.

5 Q. And on the next page, did you continue to talk  
6 about Mr. Crockett and his shortcomings?

7 A. Yes.

8 Q. And on the next page, did you continue still to  
9 say negative, derogatory things about Mr. Crockett?

10 MS. HAYES: Objection to form.

11 Q. Did you provide that information there?

12 A. I provided this information.

13 Q. And would you agree with me that -- and on the  
14 next page, Page 8, the first half of it, you continued  
15 to provide information about Mr. Crockett; is that  
16 correct?

17 A. Yes, that's correct.

18 Q. And then to go back, how long had you known  
19 Mr. Crockett when you provided this information in May  
20 of 2018?

21 A. Almost two years.

22 Q. And how much -- how much interaction, personal  
23 interaction, had you had with Laurenston {verbatim}  
24 Crockett III?

25 A. Can you repeat that question?

1 Q. How much personal interaction had you had -- at  
2 the time you wrote these eight pages of information, how  
3 much interaction had you had with Laurenston Crockett  
4 III?

5 A. Fair amount.

6 Q. And what is a fair amount? Could you be more  
7 specific?

8 A. I witnessed things he did on a weekly basis.

9 Q. And did you ever sit down and talk with him?

10 A. Yes.

11 Q. On how many occasions?

12 A. Probably spoken with him probably -- I don't  
13 know exactly how many times.

14 Q. Okay. "Mr. Crockett has forced Logan" -- and  
15 that's what you call Laurenston Crockett IV, is Logan;  
16 is that right?

17 A. Laurenston or Lauriston Crockett?

18 Q. Lauriston Crockett III -- IV you call him  
19 Logan; is that right?

20 A. We do. That's his nickname.

21 Q. Okay. Now, "Mr. Crockett has forced Logan to  
22 lie numerous times and Logan feels a lot of guilt for  
23 having to do this because he knows he's wrong but he's  
24 too afraid to say no to his father. He believes if he  
25 doesn't lie for his father his father will go to jail."

1                   And would you tell the Court and jury  
2 exactly what lies Mr. Crockett has forced Lauriston IV  
3 to tell and when.

4           A. This probably will not be a complete list  
5 because there are many. But he had him lie at his grade  
6 school at Hightower about hurting himself because he was  
7 afraid to go spend time at his mother's.

8           Q. He had him lie. Now, were you present when he  
9 had him lie?

10          A. No.

11          Q. And did -- when did Lauriston tell you that he  
12 had him lie?

13          A. It was the next day.

14          Q. Okay. And who else was present when Lauriston  
15 IV said that he had lied and what exactly did he say?

16          A. Can you rephrase that? That sounds like a  
17 couple of questions.

18          Q. Yes. Sure. Who was present when Lauriston  
19 said his daddy made him lie?

20          A. His mother and I.

21          Q. And where were you?

22          A. We were at our home.

23          Q. And exactly what did the child say?

24          A. The child said, "I'm sorry. My father had me  
25 lie for him. I didn't -- I wasn't hurting myself. I'm

1 not afraid to come here."

2 Q. And were you and your wife interrogating him  
3 about it?

4 A. Ms. Ngo wasn't my wife at that point.

5 Q. You and your girlfriend. Were you and your  
6 girlfriend interrogating the child?

7 A. No.

8 Q. Well, how did it come up?

9 A. We talked with him. We told him that we had  
10 been to school and we had spoken with his teacher and  
11 the principal and the counselor and --

12 Q. Had Logan also spoken with the teacher or the  
13 counselor?

14 A. He had.

15 Q. All right. And had Logan made any statements  
16 to the teacher or the counselor?

17 A. He made a statement to the teacher.

18 Q. And what statement had he made to the teacher?

19 A. He said, "I'm hurting my fingers. I'm afraid  
20 to go to my mother's."

21 Q. So, that was a statement that Lauriston made to  
22 the teacher. And the teacher called you -- called --  
23 you were the boyfriend. She called the mother, did she  
24 not?

25 A. No, she did not.

1 Q. Who did she call?

2 A. She didn't call anyone.

3 Q. You took it on yourself to go down there?

4 A. Mr. Crockett --

5 MS. McKNIGHT: Objection; nonresponsive.

6 Q. Did the teacher ask you to go down there?

7 A. No.

8 Q. Did you go to the school?

9 A. Yes.

10 Q. And you were the boyfriend; is that right?

11 A. Yes.

12 Q. This child had a mother and a father?

13 A. Yes.

14 Q. So, when you go to the school, who do you go  
15 see?

16 A. Ms. Ngo and I contacted the principal and the  
17 principal included the teacher and the counselor because  
18 all three of them had been involved in this incident the  
19 day before.

20 Q. And did Logan or Lauriston IV get confronted  
21 about this?

22 A. No.

23 Q. Did you and Nikki Ngo confront him about it?

24 A. No.

25 Q. Did you speak to him about it?



1 A. Yes.

2 Q. So, do you think he might have considered that  
3 confrontational?

4 MS. HAYES: Objection to form.

5 A. No.

6 Q. What did you say to Laurenston IV?

7 A. I told him that we had been to his school that  
8 day.

9 Q. And what else did you say to him?

10 A. I said we -- we met with his teacher and the  
11 principal and the counselor.

12 Q. And I noticed you say, "I said." You, the  
13 boyfriend, were doing the talking, not the mother,  
14 weren't you?

15 A. I -- I'm speaking for what I said. Mrs. Ngo --  
16 Ms. Ngo said lots of other things, also.

17 Q. Okay. But you said those things to him. What  
18 else did you, the boyfriend, say to the child?

19 A. I said, "They had told us that you had, you  
20 know, talked to your teacher at lunch while you were  
21 with your father and you had said you had hurt your  
22 finger because you were afraid to go to your mother's  
23 house." I said, "Was that true?"

24 Q. And what did he say?

25 A. He said, "I'm sorry. I did say that, but

1 that's not true."

2 Q. Well, did you expect him to acknowledge it?

3 A. Yes. He's very truthful with me.

4 Q. Are you very truthful with him?

5 A. Absolutely.

6 Q. And you certainly wouldn't set up or try to set  
7 up or cause harm to his father for something he didn't  
8 do, would you?

9 MS. HAYES: Objection, form.

10 A. Can you repeat that question, please?

11 Q. Would you set up false abuse allegations or  
12 attempt to against the child's father?

13 A. No.

14 Q. Have you ever filed charges or accused him of  
15 abuse? That's a yes or no.

16 A. I have never filed charges, no.

17 Q. Have you attempted to?

18 A. No, I haven't attempted to.

19 Q. Well, you didn't go to the Highland Park Police  
20 Department and give a statement to them alleging that  
21 Mr. Crockett had physically abused Lauriston IV April --  
22 April 22, 2019?

23 A. I did go to the Highland Park Police Department  
24 but I didn't allege that he did it. I said I suspected  
25 it may have occurred.

1 Q. And you also told the Plano Medical Group there  
2 that examined him and that checked him out physically  
3 that there were recurrent suspicious injuries, didn't  
4 you?

5 A. No, I did not say that.

6 Q. You made no mention of recurrent suspicious  
7 injuries?

8 A. Not to Logan, no.

9 Q. Well, not to Logan. Well, you said recurrent  
10 suspicious injuries. There have been -- you were there  
11 claiming that he had injured Logan, weren't you?

12 A. I didn't claim he injured Logan. I said I  
13 suspected an injury may have occurred while he was in  
14 his father's custody.

15 Q. And the child did not tell you that, did he?

16 A. No, he didn't.

17 Q. And you interrogated him about it, didn't you?

18 A. No.

19 Q. What did you ask him?

20 A. I asked him how his arm was hurt.

21 Q. And his arm -- he said -- what did he say?

22 A. He said, "I don't remember."

23 Q. Well -- and you were playing -- I believe your  
24 girlfriend said -- father/son hockey with him?

25 A. Yes, that's correct.

1 Q. And you enrolled him, Mr. Crockett's son, in  
2 father/son hockey with you; is that right?

3 A. Yes.

4 Q. And you made other allegations to the police  
5 that Mr. Crockett had been married to Ms. Ngo and had  
6 been abusive to her, didn't you?

7 A. I never said they had been married. I had said  
8 that the -- that Logan's father had been abusive to Ms.  
9 Ngo during their relationship. The police officer just  
10 assumed they had been married. He never asked me,  
11 though; and I never told him that they had been married  
12 because they never were married.

13 Q. Now, have you obtained and read the entire file  
14 including all of the interviews with Logan from the  
15 Plano -- Medical City Plano and the police?

16 A. I have the file from Highland Park police and  
17 from the emergency room doctor that we received that  
18 evening.

19 Q. And you know from reading that that the child  
20 said to them he was injured playing hockey. He told  
21 them twice, didn't he?

22 A. I am not aware of that. That didn't say --

23 Q. You have never seen that in --

24 A. Not in the reports that I have, no. Could I  
25 see those now?

1           Q. Well, when I get around to it, you certainly  
2 can, sir.

3           A. Okay. Okay. Thank you.

4           Q. And you can see the one where he says he was  
5 struck with a hockey puck. You haven't seen that,  
6 either?

7           A. No.

8           Q. I may even need my -- you may even need my  
9 magnifying glass there. Here's another one. Let's see.  
10 Where is my magnifying glass?

11                       I have other copies of that somewhere. See  
12 if you can find it in there.

13                       MS. HAYES: I can make them if we need  
14 them.

15                       MS. MCKNIGHT: Okay. I know there are some  
16 -- there are some additional records because there's one  
17 where he says he was struck by a hockey puck. It's in  
18 there? Okay. Yeah.

19           Q. Have you now read that, Mr. Cottingham?

20           A. I have never seen this before.

21           Q. My question was: Have you read it now?

22           A. I have read it now, uh-huh.

23           Q. And that report was available to you as you  
24 were the one who took the child there and made the  
25 report?

1           A. Uh-huh.

2                       MS. HAYES: Is that a yes?

3           A. Yes.

4           Q. And that was May 2019; is that correct?

5           A. I believe it was April.

6           Q. April 22, I believe, 2019.

7                       MS. McKNIGHT: Could we have a sticker on  
8 that.

9                               (EXHIBIT NO. 9 WAS MARKED)

10          Q. That's 9. I will put it with the other  
11 exhibits here.

12                               And looking back to Exhibit No. 1 here  
13 where you were giving all the information about  
14 Mr. Crockett forcing him to lie, what was he worried  
15 about his father going to jail for? How did jail come  
16 up?

17          A. Logan appears to have some fear of his father  
18 going to jail.

19          Q. And how did that come up? Did he just say "My  
20 father's going to jail"?

21          A. He -- he -- he feels that if he ever confesses  
22 on his father that he'll go to jail for things that  
23 he's --

24          Q. Confesses on his father. Have you ever been  
25 arrested, Mr. Cottingham?

1 A. Yes.

2 Q. Have you ever gone to jail?

3 A. No.

4 Q. And what were you arrested for?

5 A. Minor in possession of alcohol.

6 Q. And how old were you?

7 A. I was 20 years old and ten months.

8 Q. Okay. Now, do you know of any criminal record  
9 that Mr. Crockett has?

10 A. No.

11 Q. Do you know whether Mr. Crockett abuses alcohol  
12 or drugs?

13 A. No.

14 Q. And are you aware -- now, you've told -- you  
15 have told people that Mr. Crockett was sued and paid a  
16 5-figure judgment, haven't you?

17 A. Yes.

18 Q. And would you tell the Court and jury what that  
19 judgment was for and when that lawsuit happened.

20 A. I don't know all the specifics.

21 Q. Well, you were specific enough to tell Jennifer  
22 Frenkle and Rochelle Ritzi and Vickie Alexander that  
23 Mr. Crockett was sued and that he -- you've called him a  
24 conman; right?

25 A. Yes.

1 Q. And you said he paid a 5-figure judgment. How  
2 much was that judgment?

3 A. I don't know exactly.

4 Q. Well, you knew enough to tell them five  
5 figures.

6 A. That's what I was told.

7 Q. And who was the judgment -- who -- who was the  
8 plaintiff in the case?

9 A. I don't remember.

10 Q. And did you ever see a document substantiating  
11 that claim that you made to the child's ad litem and to  
12 the child's counselor and to the -- Ms. Frenkle who was  
13 doing this social study?

14 A. I knew he had been involved in the case.

15 MS. McKNIGHT: Objection, nonresponsive.

16 Q. Did you give them a copy of anything  
17 substantiating that?

18 A. No.

19 Q. Today can you provide any substantiation that  
20 Mr. Crockett has ever had a judgment against him for  
21 five figures or any other amount?

22 A. No.

23 Q. But yet you put that forth?

24 A. It was what I was told.

25 Q. Who told you?



1 A. Frank Bonner.

2 Q. And did he produce any evidence for you?

3 A. No.

4 Q. Now, you have also called Mr. Crockett many  
5 things. You've called him -- let me see.

6 Oh, before we go on to that, when you met  
7 Ms. Ngo on Match.com, were you still working as an  
8 expert dating coach?

9 A. Yes, I was.

10 Q. And did she come to you for dating advice?

11 A. No.

12 Q. I show you what has been marked as Exhibit No.  
13 2 and ask you what period of time you worked as an  
14 expert dating coach?

15 A. You know, it was probably for about two months.

16 Q. Well, these go on from 2012 to 2014. Would it  
17 be more like two years?

18 A. That I actually worked? It was closer to a  
19 couple of months.

20 Q. What did you do as an expert dating coach?

21 A. I consulted with people who were interested in  
22 -- in online dating.

23 Q. And you say here that -- let's see -- on one of  
24 these -- you're talking about writing profiles for them,  
25 that most profiles are written late at night when

1 somebody's drunk a half bottle of wine and you're  
2 offering to write their profiles for them.

3 A. Correct.

4 Q. Did you write profiles for people?

5 A. I did.

6 Q. And did -- did -- do you consider yourself a  
7 good writer in writing things and putting other peoples'  
8 points of view out?

9 A. Not necessarily.

10 Q. Well -- and did you write profiles for women or  
11 for men?

12 A. Both.

13 Q. And you did all of this in just two months?

14 A. I didn't do -- I -- that's how long I was  
15 active doing it. I'm sure this was up and active longer  
16 than that.

17 Q. Well, had you -- you had been on Match.com for  
18 about two years, you said?

19 A. Uh-huh.

20 Q. Had you dated a lot of women?

21 MS. HAYES: Is that a yes?

22 A. What's "a lot"?

23 Q. More than 20?

24 A. No.

25 Q. Now, to go back to your profile here that you

1 provided for Ms. Frendle, you had been operating under  
2 Underdog Kennels for -- in 2018 for about four years,  
3 had you not?

4 A. Yes.

5 Q. Would you look there at your page where you  
6 talk about your income. It says: Monthly income.  
7 \$100,000. Is that your monthly income, Mr. Crockett --  
8 Mr. Cottingham?

9 A. Oh, I didn't see that it said monthly. I  
10 thought that was annual.

11 Q. And you have an MBA?

12 A. I'm two classes short of my MBA.

13 Q. Well, you don't say that on here. You say you  
14 have an MBA.

15 A. Well, yeah.

16 Q. But even two classes short of an MBA, you don't  
17 know the difference between gross monthly income when  
18 you're writing out a statement like this and gross  
19 annual?

20 A. I do know the difference. I failed to notice  
21 it on the form.

22 Q. Well, if you're running a kennel and your gross  
23 annual income is a hundred thousand dollars, that's  
24 before you pay -- you're renting the space, aren't you?

25 A. This is income. Not revenue. There's a

1 difference.

2 Q. Well, what is your gross annual income? And  
3 gross means before you deduct the expenses, doesn't it,  
4 sir?

5 A. This is my personal income, not the revenue  
6 from my company.

7 Q. Are you incorporated?

8 A. Yes.

9 Q. And what is your salary?

10 A. I don't receive a salary.

11 Q. You just take whatever money comes in, don't  
12 you?

13 A. Yes.

14 Q. And do you still have the GoFundMe up?

15 A. No.

16 Q. You -- for a long time you had a GoFundMe. You  
17 were raising money. You were trying to raise \$97,000.  
18 Were you going to open another kennel?

19 A. That was before this kennel opened.

20 Q. And -- now, you've even lashed out at  
21 Mr. Crockett and blamed him for bad reviews that your  
22 kennel received, haven't you?

23 A. Yes. I did for one.

24 Q. And how many dogs do you have daily at your  
25 kennel, sir?

1 A. It varies.

2 Q. Well, average?

3 A. It varies by month. It's a very seasonal  
4 business.

5 Q. Well, what is your best season?

6 A. July.

7 Q. Well, last July how much did you net?

8 A. I don't know off the top of my head.

9 Q. Well, do you know -- did you -- now, you Ms.  
10 Nikki Ngo have been married now since 2018, have you  
11 not?

12 A. Yes.

13 Q. Do you file taxes together?

14 A. No.

15 Q. And why not?

16 A. We just don't.

17 Q. Where does she work?

18 A. She's a hairdresser.

19 Q. Does she have a booth anywhere?

20 A. She does things in a booth. She does things in  
21 peoples' homes. She has some people come to our home.

22 Q. And when did she last renew her license?

23 A. Last year.

24 Q. And you're telling this Court and jury that she  
25 has a current, valid license as a cosmetologist and a

1 hairdresser?

2 A. Yes.

3 Q. And does she have any allergies that preclude  
4 her from working as a hairdresser?

5 A. I don't know.

6 Q. Well, aren't you aware of allergies that she  
7 has?

8 A. I don't know that she -- what -- which ones she  
9 has which would preclude her. I mean, nothing --  
10 allergies haven't precluded her because she does  
11 hairdressing.

12 Q. Well, I agree with you they haven't precluded  
13 her. But if one is allergic to fragrances, would you  
14 agree with me that would likely preclude them from a --  
15 an employment where they smell constantly hair spray and  
16 shampoo and conditioners and permanents?

17 A. You know, she mostly does cuts.

18 Q. But in a hair salon --

19 A. She doesn't work in a hair salon.

20 Q. And she's not exposed to hair spray and that  
21 sort of thing?

22 A. I don't know what she's exposed to. I'm not  
23 there when she's doing hair.

24 Q. Well, you were present at her deposition,  
25 weren't you?

1 A. I was.

2 Q. And she said she was extremely allergic to  
3 cologne and that you stopped using cologne out of  
4 respect for that. Do you recall hearing her say that?

5 A. Yes. That's true.

6 Q. And what type of cologne did you stop using?

7 A. All the colognes that I had.

8 Q. Did you use cologne?

9 A. I did.

10 Q. So you are aware of her having an allergy?

11 A. I know that some colognes can bother her, yes.

12 MS. McKNIGHT: Objection, nonresponsive.

13 Q. Are you aware of her having a specific allergy,  
14 Mr. Cottingham?

15 A. To cologne, yes.

16 Q. And nothing else, just cologne.

17 A. I don't know.

18 Q. Well, you don't sleep with her, do you?

19 A. I do.

20 MS. HAYES: Objection to form.

21 Q. Now, Mr. Cottingham, your stepson will turn 9  
22 in a couple of months, won't he?

23 A. Yes, he will.

24 Q. And you were present at her deposition just  
25 middle of December, weren't you?

1 A. Yes.

2 Q. You heard her state that she and that 8 --  
3 almost 9-year-old child sleep in the bottom bunk of her  
4 -- of his bunk beds together.

5 A. That's what she testified to back in December,  
6 yeah. Since that time he's --

7 MS. MCKNIGHT: Objection, nonresponsive.

8 Q. Are you telling the Court now that she has  
9 ceased to sleep in the bottom bunk with him?

10 A. Yes.

11 Q. When did that happen?

12 A. It's gradually happened since --

13 Q. No. When?

14 A. Began happening in January.

15 Q. And was that a result of the deposition that  
16 you encouraged her to get the kid out of the bed or get  
17 out of the kid's bed?

18 A. It wasn't a result -- it wasn't a result of the  
19 deposition. It was a result of getting a clarification  
20 from Logan's therapist.

21 Q. Getting a clarification from Logan's therapist.  
22 You heard her say that she had talked to Logan's  
23 therapist and the therapist said it was fine. You heard  
24 her say that, didn't you?

25 A. I did hear her say that and that was our



1 understanding.

2 Q. And how did you get that understanding?

3 A. In a conversation with -- with her because we  
4 did raise -- we had concerns with -- with Mr. Crockett  
5 always sleeping with the child. We were trying to get  
6 the child to sleep on his own in our home. But it was  
7 very difficult because the father wouldn't in his home.

8 Q. And, so, that -- excuse me.

9 A. We misunderstood the therapist to say that in  
10 light of everything Logan was going through that that  
11 was okay at this -- this time period.

12 Q. But that had gone on from the time you moved in  
13 with her she slept with Logan, didn't she?

14 A. She did.

15 Q. So -- and you moved in with her in 2017.

16 A. Yes.

17 Q. So, from 2017 to 2020, she slept in the same  
18 bed with that child, didn't she?

19 A. When the child was with us, yes.

20 Q. And from August, when he came to stay in your  
21 -- in her house and your house permanently, she slept  
22 with him every night, didn't she?

23 A. She put him down every night, yeah. And once  
24 he was asleep, she comes in -- into our bedroom.

25 Q. She didn't say that in her deposition, did she?

1           A. I don't remember.

2           Q. Well -- and your testimony is that she would  
3 get up and come into your bed once he went to sleep?

4           A. Uh-huh.

5           Q. She didn't sleep there the whole time with him?

6           A. No.

7           Q. And what efforts had she made -- excuse me.  
8 Are you also blaming Mr. Crockett for the fact that this  
9 child slept in your wife's or your girlfriend's bed and  
10 then your wife's bed from 2017 to 2020?

11          A. I'm sorry. Can you repeat that?

12          Q. Are you ascribing blame to Lauriston Crockett  
13 III the child's father because that child slept in your  
14 girlfriend's bed and then your wife's bed for 3 years?

15          A. It made it very, very difficult --

16                   MS. MCKNIGHT: Objection, nonresponsive.

17          Q. Are you blaming Mr. Crockett?

18          A. Yes.

19          Q. And how do you blame Mr. Crockett?

20          A. He was the one that allowed it to happen which  
21 made it very difficult for us to do anything differently  
22 in our home.

23          Q. And up until you had to have some clarification  
24 post deposition, she didn't make an effort to get him  
25 out of her -- for her to get out of his bed, did she?

1           A. Yes, she did.

2           Q. Well, now, she was the one that would go in and  
3 sleep in a twin bunk bed with an almost 9-year-old boy,  
4 wouldn't she?

5           A. It's not a twin bunk bed.

6           Q. It's a lower bunk bed.

7           A. It's not a twin mattress, though. It's a very  
8 large bunk bed that was custom built.

9           Q. Does that -- you say that that was appropriate?

10          A. Can you -- I'm not sure I understand your  
11 question.

12          Q. You found it appropriate for Nikki Ngo to be  
13 sleeping in the bunk bed in the child's room every night  
14 with the child for 3 years.

15          A. You know, in light of what was happening in the  
16 father's home, it seemed necessary.

17          Q. So that you chalk up to the father as well.  
18 Now, let's explore some of his other shortcomings.

19                    The conman. You've told everybody that --  
20 that will listen that Lauriston Crockett is a conman,  
21 haven't you?

22          A. No.

23          Q. You put it in writing to Frendle and to Ritzi  
24 and to Vickie Alexander, haven't you?

25          A. Those three people I have, yes.

1 Q. And you've told people at hockey that he's a  
2 conman, haven't you?

3 A. No.

4 Q. And who has he conned?

5 A. There was a fairly long list of investors that  
6 Ms. Ngo told me that he had conned over the years to get  
7 funding for his company.

8 Q. Ms. Ngo told you. And based on what Ms. Ngo  
9 told you, you saw -- took it upon yourself to put it in  
10 writing and publish it, didn't you?

11 A. Publish it?

12 Q. Put something in writing and disseminate it,  
13 sir, is publishing, in the legal sense. Did you publish  
14 it?

15 A. I'm not familiar with that definition. I --

16 Q. Did you put it in writing --

17 A. I shared that information with three people.

18 Q. And you gave it out to them, didn't you?

19 A. Those three people.

20 Q. And you're saying you didn't give it out to  
21 anyone else?

22 A. I'm -- not that I'm aware of. Not that I  
23 remember.

24 Q. Now, you say here, sir, "Mr. Crockett is a  
25 racist, a misogynist and a homophobe.

1           A. Can you tell me where you're reading from,  
2 please?

3           Q. Well, let me -- well, let's just go take it  
4 pretty much page by page.

5                       Here, on the first typewritten page, you  
6 talked about him -- Mr. Crockett forcing him to lie at  
7 the school.

8                       Can you think of any other thing that  
9 Mr. Crockett, you say, has forced him to lie about?

10           A. Yeah. Logan told me about a time when -- it  
11 was near the beginning of when Logan would start playing  
12 on a hockey team and Mr. Crockett actually called up the  
13 hockey director and put Logan on the phone and had Logan  
14 tell him that he wanted to be called Lauriston. And  
15 Logan told me about that and he said, "I didn't want to  
16 do that. My dad made me do that. I'm sorry." He said,  
17 "But I didn't know what to do. I was very scared."

18           Q. Very scared. Now, when did that happen? When?

19           A. When did that conversation occur with where he  
20 put him on the phone?

21           Q. Yes. And who was the coach that he allegedly  
22 put him on the phone with?

23           A. It was the director of the hockey program,  
24 Brad, and it would have been back in --

25           Q. Does Brad have a last name?

1           A. Lukowich. Approximately August 2018, I think.

2           Q. And you say here, "Logan is terrified of  
3 Mr. Crockett. I'm scared of daddy and he yells and  
4 spansks me if I tell him it's okay that momma calls me  
5 Logan."

6                         Now, when did he tell you -- I'm assuming  
7 he told you this?

8           A. He did tell me that.

9           Q. And tell me about when he said his daddy spansks  
10 him.

11          A. He told me that probably somewhere around fall  
12 of 2017.

13          Q. And did you -- when he told you that his daddy  
14 spanked him, did you inquire about how he spanked him?

15          A. How he spansks him?

16          Q. Well, did he spank him with a hand, with a  
17 hairbrush, with a paddle, with a belt? Did he have his  
18 clothes on when he spanked him or did he pull his pants  
19 down and spank him?

20          A. I didn't ask any of those questions, no.

21          Q. He just said, "He spansks me"?

22          A. Uh-huh.

23          Q. Did he say that he had spanked him more than  
24 once?

25          A. Logan claims his father spanked him over a

1 hundred times.

2 Q. Over a hundred times?

3 A. Uh-huh.

4 Q. And when did he tell you that?

5 A. He told me that last fall.

6 Q. And did you believe that? That's a yes or no.

7 A. Yes.

8 Q. You believe that Laurenston Crockett III  
9 spanked his child over a hundred times?

10 A. Yes.

11 Q. Did he ever leave a mark on him that you saw?

12 A. I've never seen Logan's buttocks.

13 Q. Well, did Ms. Ngo ever show you or complain of  
14 any marks that the father left on him?

15 A. No.

16 Q. You were present at her deposition; and she had  
17 never seen Mr. Crockett spank Logan, had she?

18 A. I don't believe that's what she testified to.  
19 I believe she testified that she had seen him spank him.

20 Q. Well -- and what did she tell you about seeing  
21 -- what did she tell you about seeing Logan spanked by  
22 his father?

23 A. She told me she has seen Mr. Crockett spank  
24 Logan.

25 Q. And when?

1           A.  When they lived together.

2           Q.  What did he spank him for?

3           A.  She didn't go into those details.

4           Q.  Anything else that -- now -- now, you said that  
5 Mr. Crockett is a homophobe.  Do you believe he hates  
6 homosexuals?

7                           Let me just ask you what do you mean by  
8 homophobe?

9           A.  He referred to where I live as gay town --  
10 where I used to live as gay town.

11          Q.  And where did you live?

12          A.  I lived in the Oak Lawn area of Dallas.

13          Q.  Okay.  And that made you think that he's a  
14 homophobe?

15          A.  No.  I guess other things that he's said to  
16 Nikki or things that I had seen in texts from him  
17 previously to Nikki made me think he was a homophobe.

18          Q.  And do you have any of those texts to Nikki?

19          A.  No.

20          Q.  Can you produce anything that says that he's a  
21 homophobe?

22          A.  Not with me today.

23          Q.  Well, now, you were a party to a lawsuit.  You  
24 were a defendant in a lawsuit filed in the 68th District  
25 Court in Dallas -- you, Robert Cottingham, and Underdog



1 Kennels.

2                   And on Page 5 of 14 pages there, you  
3 allege: The allegations of Lauriston Crockett III on  
4 behalf of the plaintiff entities or his suspected  
5 paramour, Kevin Rachel, are complete and utter  
6 fabrications.

7                   Now, who is -- who is Kevin Rachel?

8           A. Kevin Rachel is someone I believe who sells  
9 radio advertising.

10          Q. Well, what is your understanding of what a  
11 paramour is, sir?

12          A. I believe the definition is boyfriend.

13          Q. A paramour is a boyfriend. Does it have  
14 anything to do with whether or not someone is married,  
15 whether they have a lover or a paramour?

16          A. I'm not sure. You know, I've actually -- I've  
17 never used that term. So, I'm not sure. So...

18          Q. Well, I'm going to show you --

19                   MS. MCKNIGHT: Let's go ahead and mark  
20 this.

21          A. I didn't write that.

22          Q. Well, you're a party to it and it was  
23 published, sir, by filing with the District Court of  
24 Dallas County.

25                   (EXHIBIT NO. 10 WAS MARKED)

1           A. You know, I was one of four people --

2                       MS. MCKNIGHT: Objection. I have --  
3 there's no question.

4           Q. There's no question before you, sir.

5                       I'm just going to ask you to look at 10 and  
6 see if that is the lawsuit to which you were a party.  
7 And I'm going to ask you why -- there is where the tab  
8 is -- on what basis did you allege that Kevin Rachel was  
9 Robert -- was Lauriston Crockett's paramour?

10                      MS. HAYES: What year was this?

11                      THE WITNESS: This was, let's see, probably  
12 '18. It's the lawsuit you and I and Justin were all  
13 involved in.

14           Q. What information did you have that he was a  
15 paramour to this gentleman Reynolds?

16           A. I didn't write this. I have no personal -- I  
17 have no personal information because I didn't write  
18 this. So...

19           Q. Well, were you aware that was being alleged?

20           A. I don't remember.

21           Q. Well, did you -- who did you talk to about it?

22           A. About what?

23           Q. About alleging that Mr. Crockett and Mr.  
24 Reynolds were lovers or paramours?

25                      MS. HAYES: Objection to form.

1 A. Mr. Reynolds?

2 Q. Kevin Reynolds.

3 A. Rachel?

4 Q. Kevin -- well, whoever his name is, Kevin  
5 Rachel.

6 A. I never alleged that. I didn't make that  
7 statement. I didn't write that. I have no knowledge.

8 Q. Have you ever -- have you ever talked to anyone  
9 about the two of them being involved romantically?

10 That's a yes or no.

11 A. No.

12 Q. Has Nikki Ngo suggested it to you?

13 A. No.

14 Q. Do you know -- do you know Kevin?

15 A. Not personally.

16 Q. And you're telling this jury and Court that you  
17 have no idea why that would be said?

18 MS. HAYES: Objection to form.

19 A. I don't.

20 Q. Now, let me see the copy file.

21 There was a lot of things that went on at a  
22 hockey game where there was unpleasantness between you  
23 and Mr. Crockett; is that correct?

24 A. Can you define a lot of things?

25 Q. Well, did you -- did Mr. Crockett attend a

1 hockey game where you were present?

2 A. He showed up before a hockey game where I was  
3 present.

4 Q. September 2018?

5 A. Yeah.

6 Q. And when you -- when he showed up, you were  
7 sitting in another place up in the stands, weren't you?

8 A. No.

9 Q. Where were you?

10 A. I was standing on a walkway where the players  
11 and the coaches and the teams prepare to go on the ice.

12 Q. Well, he was not anywhere near you, was he?  
13 That's yes or no.

14 A. Yes, he was.

15 Q. Did you walk down toward him?

16 A. He came to an area where I was originally --

17 Q. Did you walk toward him? Did you walk toward  
18 him?

19 A. No.

20 Q. How did you get to where he was?

21 A. He came to near where I was.

22 Q. And who was with him?

23 A. I don't know that anyone was with him.

24 Q. Now, there were other people around, weren't  
25 they?

1 A. Yes.

2 Q. Who was around to hear what was saying?

3 A. Derek Michaels.

4 Q. Who else?

5 A. I don't remember exactly.

6 Q. There were other people around.

7 A. There were other parents around, sure.

8 Q. And did you engage him in hostility?

9 What did you do when you -- what was your  
10 purpose in going down toward him?

11 A. I didn't go down toward him. He came to where  
12 I was. I was there first.

13 Q. And --

14 A. Mr. Crockett came toward where I was because  
15 Logan was standing with me. Mr. Crockett approached  
16 Logan and bent down and talked to Logan. I was standing  
17 right there. And Mister --

18 Q. What did you say to Mr. Crockett?

19 A. After Mr. Crockett had --

20 Q. What did you say to him?

21 A. I said to Mr. Crockett, you know, "The judge  
22 told you that we're free to call Logan anything we  
23 like."

24 Q. What else did you say to him?

25 A. After he proceeded to call Logan's mother a

1     whore or use a euphemism, he referred to her as the town  
2     bicycle, I said, you know, "We came here to watch Logan  
3     play hockey. We didn't come here to be harassed by you.  
4     So, we are going to leave."

5             Q. And, Mr. Cottingham, who else -- who else in  
6     that whole stand heard Lauriston Crockett call your wife  
7     the town bicycle?

8             A. He waited --

9                     MS. MCKNIGHT: Objection, nonresponsive.

10            Q. Who else? That would be a name, sir.

11            A. I don't know.

12                     MS. HAYES: Objection to form.

13            Q. You don't know?

14            A. No, I don't know.

15            Q. But you said the coach was there.

16            A. You know, after Mr. Crockett went up --

17                     MS. MCKNIGHT: Objection.

18            Q. You said the coach was there, didn't you?

19            A. The coach left after Mr. Crockett arrived  
20     because Mr. Crockett had a conversation with him and the  
21     coach didn't want to do what Mr. Crockett asked him to  
22     do.

23                     MS. MCKNIGHT: Objection, nonresponsive,  
24     self-serving, rambling and not answering the question.

25            Q. Sir, can you give the Court and jury any

1 witness to Laurenston Crockett calling your wife the  
2 town bicycle?

3 A. He waited until everyone walked away from him  
4 and then he said it to me.

5 Q. So there was no witness to it. You said that  
6 everybody was around and heard him.

7 MS. HAYES: Objection to form.

8 A. I said they were around when he initially  
9 showed up and then they all fled.

10 Q. You didn't say that he made a fuss and they all  
11 heard it.

12 MS. HAYES: Objection to form.

13 A. I'm happy to say that if you let me speak long  
14 enough.

15 Q. Now, Mr. Cottingham, what you did, you sent an  
16 email and you shared it with Jennifer Frendle and with  
17 -- well, of course with your lawyer, with Jennifer  
18 Frendle and with Ritzi and I think Vickie Alexander and  
19 highlighted in yellow. Do you -- show you No. 3. Do  
20 you recall sending that around?

21 A. Yes, I do.

22 Q. Who did you send it to?

23 A. I sent it probably to Mark, I believe, Servaes,  
24 the general manager of the arena and to Bradley  
25 Lukowich.

1 Q. Did you give it to Jennifer Frenkle as well?

2 A. Yes, uh-huh.

3 Q. And did you give it to Ricky --

4 A. Well, no, actually I didn't give it to  
5 Jennifer. Well, you know what? I'm not sure whether  
6 Jennifer received this or not. I don't remember. I  
7 never emailed anything to Jennifer.

8 Q. Did you deliver it in a packet so that it would  
9 end up in her folder that she --

10 A. That may have occurred, but I didn't email it  
11 to her.

12 Q. Well, no. You guys were not allowed to email  
13 to her, were you?

14 A. She asked us not to; so, we didn't.

15 Q. So -- but you did deliver things to her, didn't  
16 you?

17 A. Only once when she came for a family visit at  
18 our home.

19 Q. And did you highlight that in yellow?

20 A. I don't remember.

21 Q. But I'm going to ask you again: Did you -- in  
22 -- show you No. 4. Have you seen that before?

23 A. I have seen this before.

24 Q. And where did you see it?

25 A. It was an email that Mr. Crockett sent Ms. Ngo.



1 Q. And how did it get to Jennifer Frendle's file?

2 MS. HAYES: Objection to form.

3 A. It probably was included in the information  
4 that we provided to her when she came for her visit at  
5 our home.

6 Q. And do you know who -- who highlighted that?

7 A. I don't.

8 Q. And your testimony here under oath is that you  
9 did see that before?

10 A. I have seen this before yes, yeah, because this  
11 was an example of why I -- you know, I've seen many  
12 things from Mr. Crockett that were racist and this is  
13 one of them.

14 Q. And your testimony -- did you or Ms. Ngo in any  
15 way alter that email from one that she had sent to the  
16 teacher?

17 A. To a teacher?

18 Q. Ms. Ngo and Mr. Crockett were negotiating a bus  
19 ride on a field trip, weren't they?

20 A. Yes, I believe that's right.

21 Q. But when you saw that email, that was its  
22 current form; is that correct?

23 A. I don't remember the exact form I originally  
24 saw it in. Maybe. May not.

25 Q. But you're -- do you recall seeing --

1           A. This was almost 3 years ago. So...

2           Q. But do you recall seeing the "I don't sit in  
3 the -- I told them I don't sit in the back of the bus.  
4 I'm a white man." You recall seeing that?

5           A. Yes, I do. Uh-huh.

6           Q. Now, can you give any other basis -- and you  
7 use that as a basis for saying that he's racist?

8           A. No, I saw numerous things that he said were  
9 racist.

10          Q. Okay. What else did he say that was racist?

11          A. I saw things that he said around that were  
12 racist against President Obama, against other Blacks.

13          Q. Do you have any of those examples, Mr.  
14 Cottingham?

15          A. I don't have them with me today, no.

16                        You know, there were also statements that  
17 Logan made to us where his father --

18          Q. There's no question before you, sir. I'm  
19 asking you for examples. I'm asking for documents. You  
20 said you had seen documents. No.

21          A. Well, I had seen texts.

22          Q. And do you -- texts or preserve, do you have  
23 any other?

24          A. Documents? Is that what you're referring to?

25          Q. Yes.

1           A. You know, there were numerous that I saw, you  
2 know. This was back 3 years ago. Uh-huh.

3           Q. Mr. Cottingham, I'm going to show you --

4                   MS. MCKNIGHT: Go ahead and mark this.

5                   (EXHIBIT NO. 11 WAS MARKED)

6           Q. Show you -- I don't have an extra copy of it.  
7 Who is Mrs. Pape, P-A-P-E? She's from Hightower School,  
8 wasn't she?

9           A. I believe she might have been the kindergarten  
10 teacher for Logan.

11          Q. And Nikki and Mr. Cottingham -- Mr. Crockett  
12 were negotiating about a field trip and whether or not  
13 Mr. Crockett was going to ride on the bus, wasn't he?

14                   I'm going to show you what's -- Mr.  
15 Cottingham, does your wife Nikki Cottingham have the  
16 skills to create a text such as this one and disseminate  
17 it?

18          A. When you say the skills to create a text and  
19 disseminate --

20          Q. To alter the text that was actually sent  
21 between the teacher, Nikki Ngo and Mr. Crockett  
22 concerning the field trip on the bus.

23                   MS. HAYES: Objection to form.

24          A. I don't believe so.

25          Q. Now, Mr. Cottingham, Mr. Crockett, in the

1 middle of a custody case, Mr. Crockett did not get a  
2 copy of this until he found it -- until I found it in  
3 Ms. Frendle's file.

4 MS. HAYES: Objection to form.

5 Q. You were the ones who gave it to Ms. Frendle,  
6 weren't you?

7 A. Yes.

8 Q. And you're telling this Court and jury that Mr.  
9 Cottingham -- Crockett, who is in a custody fight and a  
10 death struggle with you and Nikki Ngo, would say --  
11 write to her and say, "Good to gooooo but I told  
12 everyone I'm a white man. I don't sit in the back of  
13 the bus," and send it? You're telling the jury and  
14 Court that?

15 A. When that was sent, they weren't in litigation.

16 Q. In 2017, "I'm a white man. I don't sit in the  
17 back of the bus." You're saying that -- you're still  
18 maintaining that you received that --

19 A. Yes. March 2, 2017, they were not involved in  
20 litigation then.

21 Q. Are you saying that you did not alter that  
22 text?

23 A. I am saying I did not alter this text.

24 Q. Do you know if Nikki Ngo did?

25 A. No, she did not alter this text.

1 Q. Then can you account for the different --

2 A. I saw this text when it happened in March of  
3 2017.

4 Q. You say it when it came in?

5 A. Yes.

6 Q. You saw it just like that?

7 A. Yes. Yes, I did. I remember it because she  
8 would always show me the things that were shocking from  
9 him.

10 MS. HAYES: Just for the record, you both  
11 keep saying text. This is an email communication;  
12 right?

13 MS. MCKNIGHT: Email. Okay. Yeah. It's  
14 an email. Yeah, it is an email.

15 Q. And that -- and we present that the original  
16 email is the one that involves the teacher.

17 Now, you don't have any children, do you,  
18 Mr. Cottingham?

19 A. I have a stepson.

20 Q. You don't have any biological children, do you?

21 A. No, I do not.

22 Q. And you and your first wife were married quite  
23 a while, weren't you?

24 A. Yes, we were.

25 Q. And you did not adopt any children or have any

1 biological children, did you?

2 A. No.

3 Q. And why not?

4 A. You know, we both had careers where we traveled  
5 a great deal and --

6 Q. Careers. Let's talk about your career.

7 You said you wanted out of the corporate  
8 America and you traveled. Who did you work for that you  
9 traveled a lot?

10 A. I worked for a number of different companies  
11 where I traveled a lot.

12 Q. Well, and -- that kept you from having  
13 children?

14 A. Well, my wife was a flight attendant and I was  
15 also a hockey referee. I refereed professional hockey;  
16 so, I traveled a great deal for that. And, so, we at  
17 one point made a conscious decision not to have any  
18 children.

19 Q. They weren't a priority then?

20 A. No, not at that time for us, no.

21 Q. And how did your marriage end?

22 A. In divorce.

23 Q. I know that. But who filed for it?

24 A. My wife did.

25 Q. And what were the problems?

1           A. We had irreconcilable differences.

2           Q. Now, hockey refereeing is not exactly corporate  
3 America, is it?

4           A. That is not, no. But I also had a day job.

5           Q. What was the day job in corporate America?

6           A. I worked for VeloBind General Binding  
7 Corporation for 6 years.

8           Q. General binding. What did you do for them?

9           A. I did a number of different things for them. I  
10 was a --

11          Q. What was your title?

12          A. Sales representative. And then I was a area  
13 sales manager and then I believe I was a seals -- senior  
14 sales representative for them.

15          Q. You were a salesman?

16          A. Uh-huh.

17                   MS. HAYES: Is that a yes?

18          A. Yes. I was a sales -- salesperson and I was a  
19 sales manager.

20          Q. And how did you leave that job?

21          A. I left to take an offer from Office Depot's  
22 business services division.

23          Q. And what did you do for Office Depot?

24          A. I was also a salesperson and a sales manager.

25          Q. And why did you leave Office Depot?

1           A. I had an opportunity to go work for another  
2 company. Office Depot had fallen on some hard times.  
3 Their stock price had tumbled down to 59 cents a share  
4 and they were changing their compensation plans and  
5 looked like the best days there --

6           Q. How long did you work for them?

7           A. I worked for them approximately 13 years.

8           Q. And what was the name of that company?

9           A. Office Depot.

10          Q. And where?

11          A. In Louisville, Kentucky and in Minneapolis,  
12 Minnesota.

13          Q. When did you come to Texas?

14          A. I came to Texas in 2011.

15          Q. And when Ms. Ngo met you, despite your having  
16 an MBA and having all this experience in corporate  
17 America, where were you living?

18          A. I was living in the Oak Lawn area of Dallas.

19          Q. You were living on Dickason Street; right?

20          A. Correct.

21          Q. And I believe you testified earlier that your  
22 apartment was about 600 square feet; is that right?

23          A. Not that one.

24          Q. Well, where were you living?

25          A. I was living on Dickason in a two-bedroom



1 apartment that was probably around 1300 square feet.

2 Q. What year was that?

3 A. The year that I met Ms. Ngo, 2014.

4 Q. Well, now, let's -- let's be clear about that.  
5 That was -- that was in 2014?

6 A. Uh-huh.

7 Q. You were living in this 1300-square-foot  
8 apartment on Dickason?

9 A. Uh-huh.

10 MS. HAYES: Is that a yes?

11 A. Yes.

12 Q. And when did you move into the two thousand --  
13 the 1300-square-foot one?

14 A. It was earlier that spring.

15 Q. In 2014?

16 A. Approximate -- approximate -- approximately.  
17 It's hard for me to remember. Perhaps spring of '14. I  
18 -- I don't know for sure.

19 Q. Well, perhaps we have a transcript that can  
20 help.

21 Do you recall testifying before Judge Moore  
22 in 2015 in a hearing?

23 A. Yes, uh-huh, I do.

24 Q. Do you recall telling Judge Moore that in 2015  
25 that you were living in a 600-square-foot apartment?

1           A. Yes, that's correct, because I changed my lease  
2 at the apartment I was living in because I had started  
3 Underdog Kennels and I didn't need to office from my  
4 home because I had officed from my home --

5                   MS. McKNIGHT: Objection; nonresponsive.

6           Q. But you just told us here earlier that in 2014  
7 you were living in the 1300-square-foot apartment when  
8 you met Ms. Ngo.

9                   MS. HAYES: Objection to form.

10          A. Because you asked me where I was living when I  
11 met -- when I met Ms. Ngo, I was living in a different  
12 apartment in that complex across the street from her.

13          Q. Do you know -- do you know --

14                   MS. McKNIGHT: Nonresponsive.

15          Q. Do you know Ms. Bolton, Dr. Bolton?

16          A. Yes, I do.

17          Q. And she offices on Dickason, doesn't she?

18          A. A few miles away, yes, she does.

19          Q. And how do you know Ms. Bolton or Dr. Bolton?

20          A. She is my wife's therapist.

21          Q. And when did you first meet her?

22          A. I don't remember exactly.

23          Q. Well, did you -- were you the one who referred  
24 her to Ms. Bolton?

25          A. No, I was not.

1 Q. And have you ever gone to any sessions with Dr.  
2 Bolton with Nikki?

3 A. I -- I have, yes.

4 Q. How many?

5 A. I don't know. I don't remember.

6 Q. And Ms. Bolton, in the information she  
7 furnished to -- the two pages she furnished to Ms.  
8 Frenkle said she was treating your wife for severe  
9 depression and anxiety. Is that -- was that your  
10 understanding of the diagnosis?

11 A. Uh-huh.

12 MS. HAYES: Is that a yes?

13 A. Yes.

14 Q. And how many sessions did you go to with her?

15 A. I stated I don't remember.

16 Q. And she indicates that she was also helping her  
17 with issues regarding Laurenston or Logan, as she calls  
18 him. Were you aware of what help she was seeking for  
19 Logan or helping her with Logan?

20 A. I believe it's the -- just the stress of this  
21 ongoing court battle.

22 Q. Well, now, are you -- again, you're saying that  
23 your wife's mental issues are all the fault of  
24 Mr. Crockett; is that right?

25 MS. HAYES: Object to the form of that

1 question as to mental issues.

2 Q. Well, okay. Your wife's struggle with  
3 depression, anxiety are the fault of Mr. Crockett?

4 A. I would say Mr. Crockett is -- is the cause of  
5 a lot of anxiety and depression, yes.

6 Q. Well, do you know -- has your wife shared with  
7 you how many years she had been seeing Dr. Arauzo?

8 A. I know she had seen Dr. Arauzo. I don't know  
9 specifically how long she had sessions with him.

10 Q. Well, you -- you were present at her deposition  
11 when she said she had suffered from depression and  
12 anxiety for over ten years, weren't you?

13 A. I was at the deposition. I don't remember  
14 that's exactly what she said but...

15 Q. Well, what did she tell you was her -- how long  
16 she had been treated for depression and anxiety?

17 A. We had never discussed how long she had been  
18 treated.

19 Q. You'd never discussed it?

20 A. Not the length of time, no.

21 Q. Well, now, what medications does your wife take  
22 now?

23 A. I believe Prozac.

24 Q. Anything else?

25 A. Not that I'm aware of.

1 Q. Any painkillers?

2 A. No.

3 Q. Any muscle relaxers?

4 A. No.

5 Q. Now, you heard her say that she takes Xanax,  
6 Prozac, hydrocodone.

7 A. I heard her say she had taken those things when  
8 she had had surgeries and other temporary medical  
9 conditions, yes.

10 Q. And the information that Dr. Arauzo furnished  
11 to Ms. Frendle, although he did not know her present  
12 status, she had been prescribed Prozac, Zoloft,  
13 Cymprazia {verbatim} and Effexor, Buspar, Xanax and  
14 Valium.

15 MS. HAYES: Do we have a time reference?

16 MS. McKNIGHT: Huh?

17 MS. HAYES: What time is this?

18 MS. McKNIGHT: Well, this goes from -- all  
19 the way from 2005 through 2014.

20 MS. HAYES: So, none of this is remotely  
21 relevant to the --

22 MS. McKNIGHT: Well, it's relevant to --  
23 it's relevant to that it predates Mr. Crockett whom they  
24 are trying to say is the cause of all of her anxiety and  
25 depression. And it also goes on and extends because she

1 is getting medication right now, according to her  
2 deposition, from a number of sources.

3 MS. HAYES: So, let's ask about that  
4 because that's relevant.

5 Q. What -- who is she seeing now as a doctor?

6 A. I don't know.

7 Q. You don't know?

8 A. No.

9 Q. Who did she see in October for surgery?

10 A. Dr. Raphael.

11 Q. And what kind of surgery did she have?

12 A. She had some breast implants removed to help  
13 with low back pain.

14 Q. It wasn't back surgery, then?

15 A. We never claimed it was back surgery. We told  
16 everyone she was having surgery to help relieve low back  
17 pain.

18 Q. To relieve low back pain. But it -- she was  
19 actually -- it was breast implants; right?

20 A. She had some breast implants removed, yes.

21 Q. And who is the person who prescribes for her,  
22 the doctor? Do you know who her primary care physician  
23 is?

24 A. No.

25 Q. And do you know how often she takes her

1 medications?

2 A. The only medication she takes on a daily basis,  
3 as far as I know, is Prozac.

4 Q. As far as you know. But you don't even sleep  
5 in the same bedroom with her, do you?

6 A. No, I do sleep in the same bedroom with her.

7 Q. And that is as of when?

8 A. Well, we've always slept in the same bedroom.  
9 There's always been times, though, that she's also  
10 tucked Logan in and slept with him.

11 Q. As of when did she move back into your bedroom,  
12 sir?

13 A. She's always slept in my bedroom to some  
14 degree.

15 Q. To some degree. When did she move back in full  
16 time, sir?

17 A. She's always slept in my bed. She has slept in  
18 Logan's bed, also.

19 Q. Where does she keep her medication?

20 A. It's in an upper shelf in the kitchen.

21 Q. And do you monitor it?

22 A. No.

23 MS. MCKNIGHT: Is anybody ready for a  
24 bathroom break?

25 MS. HAYES: I will take it whenever you

1 want to give it.

2 MS. MCKNIGHT: Okay. Let's do it.

3 THE VIDEOGRAPHER: We are off the record at  
4 11:34 a.m.

5 (EXHIBIT NOS. 14 AND 15 WERE MARKED)

6 (Break from 11:34 to 12:23)

7 THE VIDEOGRAPHER: Back on the record at  
8 12:23 p.m.

9 Q. Okay. And you're the same Mr. Cottingham who  
10 was testifying prior to the break; is that correct?

11 A. Yes, uh-huh.

12 Q. Now, I wanted to clarify something. Earlier I  
13 had asked you about a statement that you made to the  
14 police officers who you were talking with back in April  
15 2019 about recurring suspicious injuries. You said that  
16 you weren't referring to injuries to the child. Who  
17 were you referring to?

18 A. I don't believe I ever -- I don't know that I  
19 ever said suspicious whatever you stated.

20 Q. Well, I will represent to you that there are  
21 records, the interview records say that they were told  
22 recurring suspicious injuries. And I'm just trying to  
23 determine if you said that.

24 A. I'm -- I'm not aware that I said that.

25 Q. Okay. Then -- we spoke to -- "we were



1 concerned that some child abuse had occurred." This is  
2 your wife writing to Rochelle Ritzi and others. "We  
3 were concerned that child abuse had occurred. So, we  
4 told Logan we needed to get his arm checked out and we  
5 were going to the Highland Park Police Department" and  
6 that is when you went there and were interviewed. "And  
7 we spoke with public safety officer Jeff Ramos at the  
8 Highland Park Police Department and he spoke with Logan.  
9 Logan told him he hurt his arm when he wiped out riding  
10 his bike. Since the injury occurred in Plano, Officer  
11 Ramos instructed us to seek medical attention for the  
12 bruises and then file a police report in Plano."

13 So, as I understand it, what you did --  
14 this is on a Tuesday night; correct?

15 A. Uh-huh.

16 Q. And you took this child --

17 A. Okay.

18 Q. -- first to the Highland Park Police  
19 Department.

20 A. That's the police department where we live.

21 Q. And then you took him to Plano to Plano Medical  
22 Center and he was x-rayed there; is that correct?

23 A. Yes.

24 Q. And looked at?

25 A. Uh-huh.

1 Q. And you talked to people there, too, didn't  
2 you?

3 A. Yes. I was instructed by the police officer in  
4 Highland Park to go to the hospital.

5 Q. Did you talk to somebody?

6 A. Yes. Yes.

7 Q. Sir, it will go lots faster if you answer the  
8 question.

9 A. Yes.

10 Q. And on the police report you are listed as the  
11 complainant or the reporting person and Rob --  
12 Mr. Crockett is listed as the suspect; is that correct?

13 A. I don't know.

14 Q. Well, did you tell them you thought his daddy  
15 had abused him?

16 A. I told them that he had -- had suffered  
17 injuries while he was with his father and I suspected  
18 there may be something.

19 Q. Well, if the child is telling the truth about  
20 being hit by a hockey puck or getting hurt playing  
21 hockey, are you responsible because he was with you when  
22 it happened?

23 A. Can you repeat that question?

24 Q. You are assuming, Mr. Cottingham, that if  
25 Laurenston has a bruise on his arm and he's been with

1 his father -- and this is a quarter-size bruise, small  
2 bruise -- that his father has injured him. That's what  
3 you were assuming, weren't you?

4 A. Well, there were -- there were five bruises --

5 Q. Just yes or no. Were you assuming that his  
6 father had injured him?

7 A. Possibly, yes.

8 Q. And if he was injured while he was with you, is  
9 it necessarily true that you injured him?

10 A. Not necessarily.

11 MS. HAYES: Objection to form.

12 Q. But he's -- you have read the records now where  
13 he stated twice that he was injured playing soccer and  
14 he was hit by a hockey puck. Does that mean you injured  
15 him?

16 A. I didn't see anything that said he was injured  
17 playing soccer.

18 Q. Well, would you like to see it again?

19 A. Sure.

20 Q. Do you have it over there? No, that's not it.  
21 It's -- and you did not read that when we were sharing  
22 it with your attorney earlier.

23 A. I didn't see soccer anywhere and I guess the  
24 reason it seems --

25 Q. Did you not see soccer anywhere?

1 A. I did not see soccer, no.

2 Q. Sir, it will go much faster.

3 Now, when you took him -- took Laurenston  
4 on a ski trip last year --

5 A. Uh-huh.

6 Q. -- the winter?

7 MS. HAYES: Yes?

8 A. Yes.

9 Q. 2019? Where did you go?

10 A. We went to Afton Alps.

11 Q. And where is that?

12 A. It's outside Minneapolis. I believe it's in  
13 Hastings, Minnesota.

14 Q. And what is the name of the ski lodge?

15 A. Afton.

16 Q. A-F-T-O-N?

17 A. Yes.

18 Q. Alps, A-L-P-S?

19 A. Alps, uh-huh.

20 Q. And how far is it outside Minnesota?

21 A. It's in Minnesota. It's in Hastings,  
22 Minnesota, which is probably just outside the suburbs of  
23 Minneapolis-St. Paul.

24 Q. And you did not at any time go to Canada?

25 A. No.

1 Q. Never been to Canada with him?

2 A. Not with Logan.

3 Q. And did Logan get lost from you while you were  
4 skiing?

5 A. No.

6 Q. Didn't? And the ski patrol didn't bring him  
7 back?

8 A. No.

9 Q. Did not happen?

10 A. No.

11 Q. You're aware that he told that to the people at  
12 Hannah's House, are you not?

13 A. I did read that.

14 Q. Huh?

15 A. Yes.

16 Q. And was somebody making him lie about that?

17 MS. HAYES: Objection to form.

18 A. I have no idea.

19 Q. Well, if Hannah's House is there writing  
20 everything down, would you assume that this is something  
21 that Logan or Lauriston IV just said?

22 MS. HAYES: Objection to form.

23 A. You know, we've seen a pattern of --

24 MS. MCKNIGHT: Objection, nonresponsive.

25 (EXHIBIT NOS. 17, 18 AND 19 WERE MARKED)

1 Q. Now, I show you No. 17 where back in July or  
2 early August -- first of all, let me ask you: Did you  
3 write that or did -- this email down here, did you write  
4 it or did Nikki?

5 MS. HAYES: Do you have a copy, Mary, for  
6 me, or no?

7 MS. McKNIGHT: That's -- that's -- I've got  
8 two.

9 MS. HAYES: That's okay.

10 A. Nikki would have written the original draft and  
11 I proofread things for her.

12 Q. Do you type them up -- let me ask you this way:  
13 When this was typed up, whose fingers hit the keyboard?

14 A. Originally it would --

15 Q. When this was typed in this form, Mr.  
16 Cottingham, whose fingers hit the keyboard?

17 A. This would have been -- the form that was sent  
18 would have been Nikki's.

19 Q. Not the form. Who typed this?

20 A. Nikki.

21 Q. Nikki typed it up?

22 A. Uh-huh.

23 MS. HAYES: Is that a yes?

24 A. Yes. As I stated, she -- she writes everything  
25 and she asks me to proofread it.

1 Q. Edit it?

2 A. Yeah, edit it --

3 Q. Kind of like you did for Match.com writing  
4 profiles for people, you would edit their profiles?

5 A. No, I would completely write those profiles  
6 because I would interview people and they would have  
7 forms they would fill out, uh-huh.

8 Q. Now, what hotel were you staying at here when  
9 you left your home and went to a hotel because you were  
10 so scared of Mr. Crockett? It's right here at the  
11 bottom of the front.

12 A. No, no, no. I understand.

13 Q. "We were not even staying at home. We were  
14 staying at a hotel."

15 A. We stayed at a couple of different hotels.  
16 This time -- let's see. This time it would have been  
17 the Anatole.

18 Q. The Anatole. And where is that?

19 A. Anatole Hilton in Dallas, Texas.

20 Q. Okay. You stayed at the Anatole. And how much  
21 a night was that?

22 A. I don't know. I used points for it.

23 Q. And where else did you stay when you were  
24 hiding out from Mr. Crockett?

25 A. We also stayed at another Hilton in downtown

1 Dallas, the Statler.

2 Q. How long did you stay?

3 A. A few nights.

4 Q. How many nights?

5 A. I don't know exactly.

6 Q. And did you see the email from your wife saying  
7 I haven't heard a peep out of Mr. Crockett?

8 Let me rephrase that. Did you hear  
9 anything from Laurenston Crockett III during that period  
10 of time?

11 A. No, we did not.

12 Q. And has Mr. Crockett ever threatened you with a  
13 gun?

14 A. Not with a gun.

15 Q. Well, how -- has he ever threatened you?

16 A. Yes.

17 Q. How?

18 A. He told me the first day of school when Logan  
19 was going to Prince of Peace Pre-K if I ever went to the  
20 school or the church, I would be sorry.

21 Q. Okay. And you considered that a threat?

22 A. Well, I did when just a few days later he filed  
23 a CPS report against me.

24 Q. And -- but you're hiding out in a hotel. I  
25 don't assume you're hiding out in a hotel because of the



1 fear of a CPS filing.

2 A. No, it wasn't for a CPS filing.

3 Q. And has he -- have you ever seen him with a  
4 gun?

5 A. I --

6 Q. That's yes or no.

7 A. I've seen pictures of him with a gun.

8 Q. I don't ask you if you've seen pictures of  
9 guns, sir. The question was: Have you ever seen  
10 Lauriston Crockett III carrying a gun?

11 A. In pictures, yes.

12 Q. In pictures. No, sir.

13 Have you ever -- when you've seen him, when  
14 you've encountered him, has he ever displayed a gun?

15 That's yes or no.

16 A. No.

17 Q. And if you are afraid of him -- now, let's look  
18 at your -- let's see No. 1. Exhibit No. 1. No. No. 1  
19 is the thicker one.

20 MS. McKNIGHT: May I see your --

21 MS. HAYES: Sure.

22 Q. Okay. No. 1 has specific questions for you  
23 about the other person, the family violence  
24 questionnaire. Okay. Time out here. We want to --

25 MS. McKNIGHT: Could you stop and mark that

1 one.

2 (EXHIBIT NO. 20 WAS MARKED)

3 Q. "Struck by ice hockey puck. Initial  
4 encounter." Would you look at No. 20. And if you need  
5 to use this to help you look, feel free.

6 Have you read it now?

7 A. I have.

8 Q. And that was when you and your wife were taking  
9 this child around to medical facilities and to police  
10 departments, weren't you?

11 MS. HAYES: Objection to form.

12 Q. Weren't you?

13 A. Yes, we -- that was when we took him to the  
14 hospital.

15 Q. And Mr. Crockett wasn't anywhere around to  
16 coach him or tell him what to say, was he?

17 A. Not that day, no.

18 Q. He was with you and Nikki Ngo.

19 A. Uh-huh.

20 MS. HAYES: Is that a yes?

21 A. Yes.

22 Q. "Activity. Ice hockey. Struck by ice hockey  
23 puck." And you never --

24 MS. McKNIGHT: Go ahead and put that with  
25 our exhibits, if you would.

1 Q. And you never read that?

2 A. No. I've never seen that before.

3 Q. And you continued to try to get a criminal case  
4 filed against Laurenston Crockett III, didn't you?

5 A. When?

6 Q. When you initially decided to take his son to  
7 the Highland Park Police Department and then to the  
8 Plano Medical Center and engage the police  
9 representative there and listing him as a suspect. What  
10 was the outcome you were hoping for?

11 A. You know, I'm not sure I was hoping for an  
12 outcome. But as a coach with the Dallas Stars youth  
13 hockey --

14 Q. I don't care about coach with the Dallas Stars.  
15 Just finish your outcome.

16 MS. HAYES: You can finish -- you can  
17 finish that response. The question was: What were you  
18 hoping the outcome would be.

19 Q. And it has nothing to do with you coaching the  
20 Dallas Stars. What were you doing on the night of April  
21 22 when you and Nikki Ngo took that little kid to the  
22 Highland Park Police Department? What were you hoping  
23 for?

24 MS. HAYES: I'm going to object to form as  
25 to he didn't get to finish his prior response.

1 Q. Just go ahead. What were you --

2 A. You know, I'm not sure I was hoping for  
3 anything. But I'm a mandatory reporter if I suspect any  
4 -- any abuse. And, so, I was just carrying out my  
5 obligations. There's not just one bruise. There's  
6 actually a series of five bruises on his arm. And, so,  
7 I suspected something because when I asked Logan what  
8 originally happened, he said, "I don't know" and then it  
9 was a bike accident and he told the police officer at  
10 Highland Park it was a bike accident and the story just  
11 changed and changed and changed. My obligation is just  
12 to report it, and that's what I did.

13 Q. And, Mr. Cottingham, the pictures that have  
14 been tendered by the medical facility reflect the nature  
15 of the abuse -- of the bruises and injury. It says  
16 quarter-size bruise, doesn't it?

17 A. I haven't -- I haven't seen the entire report  
18 from the hospital.

19 Q. Okay. You've answered that.

20 A. I took him to the hospital.

21 Q. Did you see quarter-size -- a small,  
22 quarter-size bruise?

23 A. I saw five quarter-size bruises on his arm.

24 Q. Did you take any pictures of the five  
25 quarter-size bruises?

1           A. Yes, I did.

2           Q. Do you have them?

3           A. Not with me here today. They've been submitted  
4 previously.

5           Q. But you were wanting Mr. Crockett charged with  
6 child abuse, weren't you?

7           A. No. If I wanted to do that, I would have  
8 charged him. I didn't charge him.

9           Q. You can't charge anybody with anything, can  
10 you, sir?

11          A. I don't know. I didn't --

12          Q. You cannot. You have not the authority to  
13 charge. You can go to a police department and make a  
14 complaint and you did, didn't you?

15          A. I suspected something, and my obligation is to  
16 report what I suspect.

17                   MS. McKNIGHT: Objection; nonresponsive and  
18 repetition.

19          Q. And, so, after you left the last facility there  
20 in Plano after 10:00 p.m., 10:22 p.m., what did you do?

21          A. We went home.

22          Q. Did Laurenston go to school the next day?

23          A. No, he didn't. The doctor recommended that he  
24 not.

25          Q. And didn't your wife ask the doctor for an

1     excuse so he wouldn't have to go to school because it  
2     was so late?

3             A.   No.

4             Q.   Didn't do that?

5             A.   No.

6             Q.   And you're saying that quarter-size bruise --  
7     how long did that quarter-size bruise keep the child out  
8     of school, sir?

9             A.   Well, the five quarter-size bruises he -- the  
10    doctor recommended he stay home and rest the arm the  
11    next day because there was swelling and bruising. We  
12    took him the day after.

13            Q.   Swelling and bruising. And he got hit with a  
14    hockey puck.

15                    MS. HAYES:  Objection to form.  Objection  
16    to form.

17            A.   No, he never got hit -- he never got hit with a  
18    hockey puck while he was with me and he's protected in  
19    that area. So, it would never look like that if he had  
20    gotten hit with a hockey puck. And I don't know how a  
21    little boy would get hit with a hockey puck five times.

22            Q.   And you say you have pictures of five bruises?

23            A.   Yeah. You have copies of those.

24            Q.   Well, and the -- I'll welcome you to search the  
25    medical reports and show me where they document five

1 bruises.

2 MS. HAYES: Objection to form. He's  
3 already stated he hasn't seen the medical records.

4 Q. And, Mr. Cottingham --

5 A. The reports that I have state multiple --

6 MS. McKNIGHT: Objection. Objection.

7 Q. There's not a question before you, sir.

8 A. Okay.

9 Q. To go back to the family violence  
10 questionnaire: "Do you fear being in the same room with  
11 the other party during an interview? Yes."

12 Why are you afraid to be with Mr.  
13 Cottingham in a room -- in an interview?

14 MS. HAYES: Mr. Crockett.

15 A. I'm Mr. Cottingham.

16 Q. Why do you fear being in the room with  
17 Mr. Crockett during an interview?

18 A. You know, I'm afraid of his rage.

19 Q. You're afraid of his rage. In a room with  
20 other people? You're afraid of his rage is what you  
21 just said.

22 A. Yeah, I am.

23 Q. Okay. And "Are you psychologically intimidated  
24 by the other party?" Yes, you said.

25 A. I did say yes. He is very intimidating. I

1 mean, you know, half the times I've had any contact with  
2 him privately, he's been screaming at me. And that does  
3 intimidate me.

4 Q. "Are you physically intimidated by the other  
5 party?"

6 MS. HAYES: Objection.

7 Q. And you said no.

8 MS. HAYES: Objection to form.

9 A. Physically I'm not. I think if I just got in a  
10 physical altercation with him I'm not afraid of the  
11 outcome of that.

12 Q. But has he ever attacked you physically?

13 A. No.

14 Q. And he's never pulled a gun on you?

15 A. No.

16 Q. He's never brandished a broken bottle or a club  
17 or anything like that at you?

18 A. No.

19 Q. You're not accusing him of drugs or alcohol?

20 A. No.

21 Q. And you have serious concerns about your  
22 children's emotional safety. This is not your child, is  
23 it, sir?

24 MS. HAYES: Objection to form.

25 A. He's my stepchild.



1 Q. He is not your son.

2 MS. HAYES: Objection to form.

3 A. I guess I interpret it differently. He is  
4 my --

5 Q. You think he is your son?

6 A. He's my stepson.

7 Q. And you have tried every way possible to  
8 replace his father, haven't you?

9 A. No.

10 Q. "Has the Child Protective Services been  
11 contacted. Yes."

12 And you say you have -- you have  
13 experienced emotional abuse and verbal abuse from  
14 Mr. Crockett?

15 A. Yes. It's very scary when he just starts  
16 screaming at me.

17 Q. And when is the last time Mr. Crockett screamed  
18 at you, and who was present?

19 A. You know, it would have been shortly before Ms.  
20 Frendle's report came out, at my home in Highland Park.  
21 And Mr. Crockett, myself and Logan were all present.

22 Q. Anybody else present?

23 A. Not while he was screaming at me.

24 Q. Where were you in regard to your house -- your  
25 home in Highland Park?

1           A. We were at one of the entrance doors to the  
2 back side of the property.

3           Q. And what did he scream at you?

4           A. He screamed "Keep smiling, you fucking liar."

5           Q. Now, you put that in writing, too, didn't you?

6           A. Yes.

7           Q. And you sent that to everybody. You sent it --  
8 everybody being Vickie Alexander, Jennifer Frenkle and  
9 the counselor Ritzi?

10          A. Can you repeat who I sent it to?

11          Q. Vickie Alexander, Ritzi and Jennifer Frenkle.

12          A. I did not send that to Jennifer Frenkle. I've  
13 never sent -- I've never sent anything to Jennifer  
14 Frenkle.

15          Q. But you provided it to her, didn't you?

16          A. No, I did not.

17          Q. But you did send it to Ritzi and to Vickie  
18 Alexander?

19          A. Those two people I did, yes.

20          Q. And there is nobody else that heard him say  
21 that to you?

22          A. Just the three of us.

23          Q. Now, both the time that you claim at hockey,  
24 everybody had gone when he said that you had married the  
25 town bicycle. There was nobody there except Logan. And

1 there was nobody that --

2 A. Logan -- Logan wasn't there when he said  
3 anything about the town bicycle, either.

4 Q. And nobody else heard him call you a fucking  
5 liar. And by the way, you misspelled liar.

6 A. Okay.

7 MS. HAYES: Objection to form,  
8 argumentative and unnecessary.

9 Q. But nobody else heard you -- heard him say  
10 that, did he?

11 A. Not that I'm aware of.

12 Q. And you -- Mr. Crockett, do you know if he  
13 ordinarily uses that kind of language?

14 A. Yes, he does.

15 Q. And how do you know that?

16 A. Mrs. Ngo -- Ms. Ngo lived with him for many  
17 years.

18 Q. Now, Ms. Ngo uses foul language, doesn't she?

19 A. Not very often.

20 Q. But there's nobody else who's not a party to  
21 this suit that's ever come forward and heard  
22 Mr. Crockett use that language.

23 MS. HAYES: Objection to form.

24 A. That's hard for me to say.

25 Q. But you put it in writing again and published

1 it, didn't you?

2 A. I put it in writing to two people.

3 Q. And it's your word against his and who is the  
4 more credible person, isn't it?

5 A. I beg your pardon?

6 Q. And you are the one calling him a pathological  
7 liar.

8 A. Yes, I have called him that.

9 Q. And you've done that in writing and published  
10 it numerous times, haven't you?

11 A. I'm not sure I've done it numerous times but I  
12 have sent it probably to -- said it to numerous people,  
13 sure.

14 Q. Now, you're claiming -- you've claimed that  
15 Mr. Crockett has somehow alienated Logan from his  
16 mother?

17 A. Yes.

18 Q. And yet you write in here "It's kind of like  
19 Mr. Crockett being both a homophobe and in an amorous  
20 relationship with another man." You say --

21 MS. HAYES: Objection to form.

22 Q. -- Nikki has a wonderful relationship with  
23 Logan. Is she alienated or does she have a wonderful  
24 relationship with Mister --

25 A. Despite Mr. Crockett's attempt to alienate

1 Logan from her, she's been able to create a wonderful  
2 relationship with Logan. And I never --

3 Q. There's no question before you.

4 Now, here -- you've also called  
5 Mr. Crockett, on many occasions and in writing, a  
6 narcissist and have diagnosed him with a narcissistic  
7 personality disorder. Do you think you're a narcissist,  
8 sir?

9 A. No.

10 Q. Narcissists are very focussed on I and me,  
11 aren't they?

12 A. Yes.

13 Q. Okay. I want you to look at Exhibit No. 16.  
14 And you have written to Laurenston Crockett, the father  
15 of the child here. And you're talking about hockey.  
16 "Please consider this. I grew up playing hockey. I  
17 played travel hockey all through my youth and played on  
18 my hometown's All Star team. I started out on the  
19 varsity all 3 years in high school. I played on a  
20 national championship team in college. I was a paid  
21 coach for 3 years with an extremely competitive youth  
22 triple A travel hockey program in North Dakota and  
23 Minnesota."

24 Sound pretty narcissistic so far?

25 MS. HAYES: Objection to form.

1           Q. I. I. I. Do you see anything there about  
2   Laurenston?

3           A. Well, I'm not writing about Lauriston. I'm  
4   writing about myself trying to share --

5           Q. Then I began -- then I -- you're trying to make  
6   -- you're trying to intimidate him and make him feel  
7   less than.

8           A. No. I'm just trying to explain that hockey's  
9   been an enormous part of my life for practically as long  
10   as I can remember. And if I'm willing to parallel  
11   parent in something that's been such a huge part of my  
12   life, you know, it would be great if he could, too,  
13   because this is what's best for Logan.

14          Q. But, sir, when push came to shove, down at the  
15   very end, you wrote --

16                   MS. MCKNIGHT: Let me go ahead and put a  
17   number on that.

18                   (EXHIBIT NO. 21 WAS MARKED)

19          Q. No. 21 here, you wrote, on December 12, 2018,  
20   to Rochelle Ritzi, after she had been pushing and  
21   negotiating and tried to get you to give him a list of  
22   the hockey things he needed, you wrote, "After much  
23   deliberation, we decided we did not want to encourage  
24   Mr. Crockett to attend Logan's hockey practices and  
25   games on his days because we had been reminded of our

1 prior experiences at Logan's soccer and Logan's karate  
2 where Mr. Crockett would make disparaging remarks to  
3 other parents regarding Nikki."

4 And that was the final -- that was your  
5 final say on it.

6 A. I wasn't --

7 Q. Did you write that?

8 A. I did write this.

9 Q. Okay.

10 A. This wasn't my final say on this.

11 Q. All right. You did write it?

12 A. Because we did -- I did write it and it was  
13 what we felt for a while because Mr. Crockett did have a  
14 habit of blowing things up.

15 MS. MCKNIGHT: Objection. Objection.

16 Q. Look. You said you were talking back to  
17 soccer. Soccer had been four years or five years ago,  
18 hadn't it?

19 A. It had been, yes.

20 Q. Yes. And you're referring back there to  
21 something years ago and using that as an excuse.

22 A. Well, it was because that was our last  
23 experience in an organization like this.

24 Q. And you're looking back at four years -- four  
25 years back at something you claim happened and saying we

1 just decided no, we don't want him coming on our time  
2 and we don't want him showing up on his time. That was  
3 what you said there, wasn't it?

4 A. No, that wasn't what we said.

5 Q. Yes, it was what you said. And look what she  
6 wrote back to you.

7 MS. HAYES: I'm going to object as to form.  
8 Is there a question?

9 Q. Yes. Now, back to the -- back to the letter  
10 you wrote to Laurenston Crockett talking about I, I, I.  
11 "Then I began refereeing. I was scouted and placed in a  
12 very special referee development program where I trained  
13 three different USA Olympic training centers, Marquette,  
14 Lake Placid and Colorado Springs. I refereed Division I  
15 college hockey and Canadian for two years and then began  
16 refereeing pro hockey." That's all about I and me,  
17 isn't it?

18 A. I was telling him about my experience. So...

19 Q. I can read, sir.

20 A. Yeah. I was telling him about my experience.  
21 So, I don't know what other pronouns to use to describe  
22 myself but...

23 Q. Did you really feel the need to describe  
24 yourself that much where you're trying --

25 A. Well, Mr. Crockett didn't know me very well and



1 I was trying to be reasonable with him and just --

2 Q. And this is tried being reasonable --

3 MS. HAYES: Objection to form. Somebody  
4 has to be --you can't talk over each other. Finish.

5 Q. Okay. And then down at the bottom here you  
6 said, "You have been begging us for months for the  
7 opportunity to see Logan play hockey." Should a father  
8 have to beg you for the opportunity, sir?

9 MS. HAYES: Objection to form.

10 Q. These are your words. "You have been begging  
11 us for months."

12 A. Well, he had been asking to come and join our  
13 family activities on our days. We are not part of an  
14 organized team or anything like that. It's like if we  
15 were going to go play catch in a park or go to a movie  
16 or things like that, he was wanting to be involved in  
17 those types of things. And all of our experience has  
18 shown it's very difficult for all of us to be together.  
19 It causes a great deal of stress on Logan. We were  
20 trying to follow the recommendations of --

21 Q. Yes. I understand.

22 A. You don't want to hear my whole answer?

23 Q. No. I'm looking at what you've written and I'm  
24 looking at what you've done.

25 MS. HAYES: Objection to form.

1           Q. Now, you have written out these eight pages of  
2 really vile allegations against this man, haven't you?

3           MS. HAYES: Objection to form. Can you  
4 find the other Exhibit 1 if we are going to continue  
5 referring to it so I can have mine back?

6           MS. McKNIGHT: This may be it here.

7           MS. HAYES: Yeah. That's it. Thank you so  
8 much.

9           A. What was your question?

10          Q. You wrote these eight pages of allegations and  
11 you have no witnesses, you have no documentation as to  
12 the lawsuits. You have no witnesses as to the things  
13 you've alleged he said. And you sent an altered  
14 document to Jennifer Frendle, didn't you?

15          MS. HAYES: Objection to form.

16          A. I've never sent any document to Jennifer  
17 Frendle.

18          Q. Well, you delivered it to her, sir. Excuse --  
19 let's get it correct. You delivered it to her --

20          A. I have not delivered any documents to Jennifer  
21 Frendle that to my knowledge have ever been altered, is  
22 that what you said?

23          Q. Did you deliver that, "I don't sit in the back  
24 of the bus. I'm a white man"? Did you deliver it, or  
25 did Nikki?

1 A. We delivered it together.

2 Q. And did you prepare it together?

3 A. I printed it -- or she printed it. We would  
4 have worked together to compile the information.

5 Q. And what computer did you print it off of?

6 A. I don't remember.

7 Q. Do you still have that computer?

8 A. Well, I don't remember which computer it was;  
9 so, I'm not sure.

10 Q. Well, that was 2018. Have you changed  
11 computers?

12 A. Yes.

13 Q. Mr. Crockett still has his.

14 MS. HAYES: Objection to form.

15 Q. Would you check your computer and see if you  
16 still have that email?

17 A. I can look.

18 Q. Please do because the original one, is that the  
19 one -- the one that you see that interacts with the  
20 teacher, not just Nikki and him.

21 A. Can I have a copy of what you're referring to,  
22 please?

23 Q. We'll get you one before we leave here today.

24 A. Okay.

25 Q. Now, what sort of relationship -- what kind of

1 access, if you could choose, would you have Mr. Crockett  
2 have to his son?

3 A. It would be supervised visitation.

4 Q. Forever.

5 A. I'm not sure how long. I haven't given it that  
6 much thought.

7 Q. And when -- on New Year's Day, what did you and  
8 Laurenston do?

9 A. On New Year's Day?

10 Q. Yes.

11 A. Which year?

12 Q. This year.

13 A. This year?

14 Q. Yes.

15 A. We went to -- we both attended the Winter  
16 Classic hockey game at Fair Park.

17 Q. And did Nikki go as well?

18 A. She did.

19 Q. Now, when -- show you No. 21. When -- on  
20 December, whatever date that was, she -- Rochelle Ritzi  
21 wrote back to you and said, "Thank you for the  
22 clarification. I must have misunderstood you" because  
23 she did not understand that you just did not want him  
24 there. She says to you, "Choosing not to share the  
25 sizes and brands of equipment is validating Logan's

1 feelings that you're alienating his dad from being a  
2 part of something Logan loves. I do want to validate  
3 and say I understand your concerns. Laurenston claims  
4 to have similar letters from parents," et cetera. "My  
5 recommendation," dah, dah, dah.

6 Then he said, that being said, "I encourage  
7 you to consider how Logan perceives this. He feels you  
8 are trying to keep his father from being a part of  
9 something he enjoys." Did you receive and read that?

10 A. I did. And, so, at that point, I did provide  
11 her with a copy of all the equipment, all the sizes, all  
12 the brands that Logan uses.

13 Q. What is the state or condition of your wife's  
14 health?

15 A. It's good.

16 Q. Does she ride bicycles?

17 A. She does.

18 Q. And this Dr. Raphael, when he took her implants  
19 out, are he the ones -- is he the surgeon that had done  
20 the implants?

21 A. I believe so, yes.

22 Q. And he also did her jaw when she had the jaw  
23 work done, didn't he?

24 A. I'm not sure about that.

25 Q. And what other -- he did her eyes?

1 MS. HAYES: Objection to form.

2 A. I don't -- I don't know anything about that.

3 Q. How long ago --

4 A. I'm not aware she had any eye surgery, other  
5 than LASIK.

6 Q. How long ago did he do the implants?

7 MS. HAYES: Objection.

8 A. Put them in?

9 Q. Yes.

10 A. I have no idea.

11 MS. McKNIGHT: Now -- that's one we've  
12 already -- go ahead and mark these.

13 (EXHIBIT NO. 22 WAS MARKED)

14 Q. Show you Deposition Exhibit No. 22. Did you  
15 provide that to -- to Ms. Frenkle or did your wife?

16 MS. HAYES: Objection to form.

17 A. I'm not sure.

18 Q. Well, did you take that picture?

19 A. I did not take that picture.

20 Q. Can you tell the Court and jury when it was  
21 taken?

22 A. I'm not sure.

23 Q. Can you tell the Court and jury where it was  
24 taken?

25 A. I'm not sure.

1           Q. And tell the Court and jury when you ever saw  
2   Laurenston drive -- Laurenston IV in the front seat of a  
3   car.

4           A. I've seen video.

5           Q. When did you see it?

6           A. I don't recall.

7           Q. Well, did you ever see it?

8           A. I don't recall.

9           Q. Show you 5 and ask you: Did you write that  
10   letter, or did your wife write it to Rochelle Ritzi?

11          A. Nikki would have written this and then I would  
12   have proofread it and corrected it, any spelling or  
13   grammatic errors.

14          Q. Corrected it? And how -- how extensively do  
15   you edit her things, sir?

16          A. You know, it -- it depends. English is her  
17   second language. So, there are certain phrases that she  
18   doesn't necessarily get correctly.

19                   MS. MCKNIGHT: Have you mark these.

20                           (EXHIBIT NO. 23 WAS MARKED)

21          Q. In November 2018, is that a letter that you  
22   wrote to Rochelle and signed?

23          A. Yes, I did.

24          Q. All right. And that was -- and that was in  
25   2018; is that correct?

1           A. That is correct.

2           Q. And you said, "In retrospect, we have decided  
3 we don't see an amicable way to make this work. It will  
4 just result in more stress."

5                           What were you talking about?

6           A. It'd probably be helpful if I could see more  
7 than just this page. It's hard to say any one time.

8           Q. Well, you were not wanting to have Mr. Hockett  
9 -- Mr. Crockett involved in hockey, were you?

10          A. You know, I was wanting Mr. Crockett to be  
11 involved on the days that we weren't going to be  
12 involved because we felt it was important for Logan to  
13 play the sport full time and not just half time but  
14 Mr. Crockett didn't seem to be interested in taking  
15 Logan on his days. He only seemed interested in coming  
16 on our days.

17                           MS. MCKNIGHT: Objection, nonresponsive.

18          Q. Sir, is there anything -- now, you say here,  
19 "It's baffling to us how Logan can prefer being with  
20 Mr. Crockett to living with us. But all at the same  
21 time he's terrified to ask his father to take him to  
22 hockey."

23                           Now, you were recognizing there that Logan  
24 preferred being with his dad to living with you and Ms.  
25 Ngo?



1           A. At that point it was that way because we were  
2 really trying to stress education with him and doing his  
3 homework. And, you know, later we found out it was  
4 because his father wasn't stressing education and  
5 homework. And, so, there was really kind of an  
6 imbalance of parenting in the homes.

7           Q. So you don't recognize that this young man  
8 loves his father and loved doing things with him and  
9 being with him?

10          A. I did recognize he had lots of fun with his  
11 father because it was mostly fun and games but he also  
12 felt a lot of stress because he was frequently  
13 reprimanded for things and punished for things if he  
14 didn't do them perfectly as his dad wanted him to.

15          Q. Now, who -- who is a witness to that, sir?

16          A. Well, it's what Logan told me.

17          Q. Is there any witness, any collateral people,  
18 any school people, anybody that can verify that he got  
19 punished by not -- for not doing things perfectly?  
20 Anybody?

21          A. I believe Dr. Ritzi has alluded to things like  
22 that in her testimony.

23          Q. And Dr. Ritzi receives all of this venomous  
24 emails that you -- that your wife writes and you edit  
25 and you send to her, just a steady stream, don't you?

1           A. She receives things from us that we believe are  
2   pertinent.

3           Q. And you believe something is pertinent just  
4   about every day.

5                         Does she charge you for all those emails?

6                         MS. HAYES: Objection to form.

7           A. I believe she does. But it's not every day.

8           Q. Have you -- have you collected and stacked up  
9   the number of emails and communications that you have  
10   sent to her?

11          A. No.

12          Q. Now, you -- if you were afraid of Mr. Crockett,  
13   would you really ridicule him and --

14                         MS. HAYES: Objection to form.

15          Q. -- poke the gorilla?

16                         MS. HAYES: Objection to form.

17          A. Was that a question?

18          Q. I'm asking another one.

19          A. Okay.

20          Q. How many -- what are your hours that you work  
21   at the dog kennel?

22          A. It's different every day.

23          Q. Well, what is the longest hours that you work?

24          A. The longest hours I've worked there? Probably  
25   14 hours in a day, 15 hours in a day.

1 Q. And how many days a week does Nikki Ngo work?

2 A. Different every week.

3 Q. And you and she, do you -- now, you don't file  
4 taxes together, do you?

5 A. No.

6 Q. You just said you don't.

7 A. We don't.

8 Q. Do you bank together?

9 A. No.

10 Q. You don't bank together. You don't file taxes  
11 together. And up until you said January, at least  
12 according to Laurenston, you weren't sleeping together.  
13 So, is yours a regular marriage, Mr. Crockett?

14 MS. HAYES: Objection to form.

15 Q. Mr. Cottingham?

16 A. Yes. She had her own banking accounts before  
17 we got married. I had my own banking accounts before we  
18 got married. And we do share the same bedroom on a  
19 regular basis.

20 Q. Now, you said that Mr. Crockett just -- he was  
21 just a fun dad. He didn't -- didn't -- wasn't  
22 interested in education or anything like that. Who was  
23 the one who saw to his dental care?

24 A. Both parents.

25 Q. You think? Now --

1 MS. HAYES: Objection, form.

2 Q. -- in the last seven months, in the last --  
3 since August, assuming that Laurenston had seen the  
4 dentist, according to his records, in April with his dad  
5 for checkup, maintenance, preservatives, all that, when  
6 did Nikki next take him to the dentist?

7 A. I don't remember exactly, but last fall she  
8 started making arrangements to take him to the dentist.

9 Q. Why would you need to make arrangements?

10 A. She attempted to take him back to his old  
11 dentist but his old dentist said that Mr. Crockett had  
12 told them that --

13 MS. McKNIGHT: Objection, nonresponsive.

14 MS. HAYES: Actually, you can answer that  
15 question.

16 A. Okay. So, Nikki tried to make an appointment  
17 with his old dentist, the dentist he had been seeing all  
18 along --

19 Q. And what is that dentist's name?

20 A. I don't remember.

21 Q. Old dentist. And when did she make --

22 A. I believe it starts with an F, but I don't --

23 MS. HAYES: Let him finish his response and  
24 then you can ask follow-up questions.

25 Q. When did she start trying --

1 MS. HAYES: Let him finish his response and  
2 then you can ask a --

3 MS. McKNIGHT: It will be next week but go  
4 ahead.

5 MS. HAYES: You asked why. Why did she  
6 need to make arrangements?

7 A. Because the dentist told us that Mr. Crockett  
8 told them that he had sole custody of Logan and she was  
9 not allowed access to anything there. So, she needed to  
10 hunt for a new dentist for Logan.

11 Q. Now, what is this dentist's name that said that  
12 -- said -- you're telling here under oath -- did you  
13 hear the dentist say that?

14 A. I heard the dentist's assistant say that.

15 Q. And the dentist's assistant said what?

16 A. "I'm sorry. I can't release any information to  
17 you. Your file states that Mr. Crockett has sole  
18 custody of Lauriston and you're not entitled to that  
19 information."

20 And, so, she left a message for the dentist  
21 to call her back personally and the dentist would not  
22 call her back.

23 Q. So then what did she do?

24 A. She started asking for referrals at school for  
25 a good dentist for Logan to begin seeing.

1 Q. And how many months was it before Logan got any  
2 dental care?

3 A. I'm not exactly sure that it -- that it was  
4 months. I'm not exactly sure.

5 Q. You're not sure it was months?

6 A. No.

7 Q. Do you know anything about the condition of his  
8 teeth?

9 A. Yeah. He's had multiple visits to a dentist to  
10 address a number of different issues and he's got  
11 further appointments scheduled that should be coming up  
12 shortly.

13 Q. Do you know when?

14 A. I know it's shortly. I don't have a calendar  
15 in front of me.

16 Q. And what all did he have to do in the one visit  
17 that he made earlier?

18 A. He's had multiple visits. I don't have those  
19 records with me today. But there's a number of  
20 different things.

21 Q. He had an extraction, didn't he?

22 A. He did have an extraction.

23 Q. And he had several crowns?

24 A. He did, uh-huh.

25 Q. And he had fillings?

1           A. Uh-huh.

2                       MS. HAYES: Is that a yes?

3           A. Yes.

4           Q. And he has a tooth up here coming in that is an  
5 extra that has to be surgically removed.

6           A. Correct. And that's scheduled in multiple  
7 procedures with two different dentists are scheduled for  
8 that same day.

9           Q. And he, also, on the other side of his mouth,  
10 he's got decay, going to have to have crowns and more  
11 fillings, isn't he?

12                      MS. HAYES: Objection to form.

13           A. Like I said, I don't have all the records in  
14 front of me. So, it's difficult for me to speak to you  
15 today. But he's always had difficult dental work.

16           Q. Has she ever taken him to the dentist before?

17           A. I can't speak to that.

18           Q. Well, if Mr. Crockett is such a fun dad just  
19 not doing anything except fun and games and front seat  
20 car rides, who took him to the dentist and the doctor  
21 and got all of his shots all those years?

22                      MS. HAYES: Objection to form.

23           A. As far as I'm aware, she attended some visits.  
24 Some visits were -- were Mr. Crockett only.

25           Q. And you're saying that's true with dentists as

1 well?

2 A. I can't speak specifically.

3 Q. Isn't it true that Mrs. Ngo -- Ms. Ngo didn't  
4 feel that baby teeth were important enough to have  
5 expenses on or to bother with?

6 MS. HAYES: Objection to form.

7 A. I don't know that.

8 Q. Did she ever discuss it with you?

9 A. No.

10 Q. But -- and Ms. Ngo executed a document that  
11 authorized you to get medical care for Laurenston,  
12 didn't she?

13 A. Lauriston required --

14 Q. Did she execute -- did she execute a document  
15 that permitted you, Mr. Cottingham, to obtain -- to take  
16 him to the doctor and consent to medical care without  
17 either his mother or his father being present?

18 A. I'm not sure what she consented to.

19 Q. Well, did you have a copy of that document?

20 A. I don't have anything with me today, no.

21 Q. Well, I know you don't have it today. But were  
22 you provided a copy, sir, of a document authorizing you  
23 to obtain medical care for him?

24 A. I do not have a copy of that.

25 Q. Did you ever have a copy of it?



1           A. I didn't -- I've not received a copy of that.

2           Q. Did you ever take him for medical care without  
3 her present?

4           A. He had ringworm; so, I took him to the doctor  
5 and I also took him to the doctor to get a flu shot.

6           Q. Anything else?

7           A. No.

8           Q. Was there some reason she couldn't do it?

9                       MS. HAYES: Objection to form.

10          A. I was going to be in that area doing different  
11 things; so, it made sense from a family perspective  
12 because we share things as a family.

13          Q. Now, as far as -- as you and Ms. Ngo, you do  
14 not -- you live in an apartment; is that correct?

15          A. Yes, we do.

16          Q. And the business that you have, the Underdog  
17 Kennels, that's your sole, separate business, isn't it?

18          A. Yes, it is.

19          Q. And do you and she have any jointly owned  
20 property?

21                       MS. HAYES: Objection to form.

22          A. No.

23          Q. And -- and the concerns that you've listed  
24 here, concerns that you stated about the other parent,  
25 we've talked about you saying mister -- we are on page

1 -- we are on No. 5 here in this writing, these seven  
2 pages of writing you did about the father. And it's  
3 here in Exhibit No. 1 where Mr. Crockett is a conman.  
4 He's been sued numerous time for fraud and nonpayment of  
5 funds. Mr. Crockett is a pathological liar.  
6 Mr. Crockett is a narcissist and has never been able to  
7 accept that Nikki left him. So, he's done everything in  
8 his power to retaliate against her ever since.

9 It's your position he wants her back?

10 A. Yes, he did, uh-huh.

11 Q. And you say he's a pathological liar. Have you  
12 lied any here today, sir?

13 A. No.

14 Q. Now, to go back to your testimony in 2015, you  
15 were there at a hearing where Judge Moore -- it was --  
16 the issue there was the child had made a statement and  
17 Mr. Crockett played a tape -- do you recall that --  
18 played a tape-recording where the child said you had a  
19 stinky pee-pee. Do you remember that?

20 A. I was not in court for that.

21 Q. Do you remember that being discussed?

22 A. Yes.

23 Q. And do you remember the tape being played?

24 A. No. As I said, I was not in court.

25 Q. And did you ever review the transcript of that

1 hearing?

2 A. I did see the transcript, yes.

3 Q. Okay. And your wife said, "Well," you know --  
4 when she was asked how he would -- why the child would  
5 be commenting about your pee-pee said, "maybe it was  
6 when they went to the bathroom or something."

7 Do you recall reading that?

8 A. No.

9 Q. Now, do you remember the -- the situation with  
10 Lynn Hunt the lawyer who was representing him  
11 questioning about the name of your dog?

12 MS. HAYES: Objection to form.

13 Q. What was the name of your dog in 2015?

14 A. My dog is named Finnegan.

15 Q. Finnegan.

16 A. Uh-huh.

17 Q. And do you recall the video of Finnegan licking  
18 Laurenston's face in your bed?

19 A. I've never seen a video of Lauriston -- of  
20 anything like that, no.

21 Q. Well, did you -- did you read the transcript  
22 where Finnegan had licked Laurenston's face and his dad  
23 asked him where he was and he said he's in his mother's  
24 bed -- in bed at your apartment?

25 A. Uh-huh, I do remember that.

1 MS. HAYES: Objection to form.

2 Q. And you had -- and you had just testified that  
3 he had never been in your bed or apartment.

4 A. No, that's not correct. I testified that he  
5 had never spent the night --

6 MS. HAYES: Objection, nonresponsive after  
7 "yes, that's correct."

8 Q. And do you deny that Laurenston IV on that  
9 occasion when his dad was talking to him and the dog was  
10 licking his face that he was in your bed?

11 MS. HAYES: Objection to form.

12 Q. Do you deny that?

13 A. I can't comment because I don't know exactly  
14 what that's in reference to.

15 Q. It's in reference to the testimony under oath  
16 -- everyone at the hearing in 2015 before Judge Moore  
17 referencing the child saying you had a stinky pee-pee.  
18 And --

19 MS. HAYES: Objection to form.

20 Q. And his dad asked him, "Why do you say that?  
21 Because it is."

22 MS. HAYES: Objection to form. You cannot  
23 ask this question and he cannot answer this question.  
24 The Rule was invoked then. He was -- he has no personal  
25 knowledge of this.

1 Q. But you did review the transcript. I'm asking  
2 you: Was Laurenston ever in bed -- your bed -- with his  
3 mother and your dog Finnegan?

4 MS. HAYES: Objection to form.

5 A. I don't know that they ever were.

6 Q. Can you say that they were not?

7 A. I cannot. I don't know whether they were or  
8 not. Nikki used to --

9 MS. HAYES: Objection, nonresponsive.

10 MS. MCKNIGHT: Objection.

11 Q. And you wanted a copy, sir, of the document we  
12 contend was altered. There it is.

13 A. Okay.

14 MS. HAYES: Mary, for the record, the email  
15 that you just handed Mr. Cottingham, I have the  
16 original. So, I'm happy to provide it to you today.

17 MS. MCKNIGHT: And the original is just  
18 like that?

19 MS. HAYES: It's complete. It has the  
20 before and after but it's -- it's the entire  
21 conversation between these individuals from that day.

22 Q. Now, just so we are clear -- apparently you do  
23 not like people who lie; is that right, sir?

24 A. That's correct.

25 Q. And you think that liars make a very poor

1 parental example.

2 A. Yes.

3 Q. Now, in -- what date do you say that you moved  
4 into the 600-square-foot apartment you described in  
5 court that day in 2015?

6 MS. HAYES: Objection to form.

7 A. I'm not exactly sure the date; but it was, I  
8 believe, the latter part of December of 2014 because I  
9 used to office from home and I didn't need that space.  
10 I would have an office at the kennel. So, I didn't need  
11 that large an apartment any longer.

12 Q. And how long did you live in the  
13 600-square-foot apartment? It was at the same address;  
14 is that correct?

15 MS. HAYES: Objection, form.

16 A. It had a different street address.

17 Q. Okay. What was the street address?

18 A. It would have been something -- I believe the  
19 street address was on 2929 Wycliff.

20 Q. Was that the bigger apartment or the smaller  
21 one?

22 A. That was the smaller.

23 Q. And the bigger one was on Dickason; right?

24 A. Correct.

25 THE WITNESS: Can we take a break for a

1 bathroom break soon?

2 MS. McKNIGHT: Sure. Sure. Right now is  
3 good.

4 THE VIDEOGRAPHER: We are going off the  
5 record at 1:30 p.m.

6 (Break taken from 1:30 to 1:42)

7 THE VIDEOGRAPHER: Back on the record at  
8 1:42 p.m.

9 Q. Okay. Mr. Cottingham, when -- does Lauriston  
10 have any pictures of his father in his room at your  
11 house?

12 A. Uh-huh.

13 MS. HAYES: Is that a yes?

14 A. Yes.

15 Q. And is he allowed to keep any of the things  
16 that his father gives him?

17 A. Yeah, he's got all of it.

18 Q. All of it. Could you describe what he has that  
19 his father's given him in his room?

20 A. Oh, gosh, probably not. There's tons and tons  
21 and tons of toys and games and all kinds of things.

22 Q. Now, it's been your contention that the father  
23 bribes Logan or Laurenston. Do you and Ms. Ngo  
24 Cottingham engage in anything that you would consider  
25 bribery or outdoing the dad?

1 A. No.

2 Q. How many vacations in the last 3 years have you  
3 taken Laurenston on?

4 A. I'm not sure.

5 Q. Well, where have you gone outside the states?

6 A. We haven't -- I haven't taken him anywhere  
7 outside the states. I've joined a vacation to San  
8 Diego. I've gone to Minneapolis with Logan. I've gone  
9 to New York City with Logan.

10 Q. When did you go to New York City?

11 A. That was the end of school year last year.

12 Q. And how long did you stay?

13 A. Not exactly sure. Maybe about five days.

14 Q. Five days in New York City?

15 A. Uh-huh.

16 Q. And you sent a letter to Rochelle Ritzi telling  
17 her that Mr. Crockett would get to hear of all the  
18 things that he had done, all the places like the Statue  
19 of Liberty and the musical he had seen and the -- all of  
20 the things that he had enjoyed there.

21 Do you recall writing that?

22 A. Yes.

23 Q. How much money did it cost to go to the five  
24 days in New York?

25 A. I don't know.



1 Q. Did you pay for it?

2 A. Yes.

3 Q. And did you buy plane tickets?

4 A. Yes.

5 Q. How many?

6 A. Three.

7 Q. And you paid for hotels while you were there  
8 for five days?

9 A. We probably used points for hotels.

10 Q. But did you -- when you went skiing, you stayed  
11 at the ski lodge; right?

12 A. No. There aren't accommodations at the ski  
13 slope.

14 Q. Where did you stay?

15 A. We stayed at I believe it was a Double Tree in  
16 downtown Minneapolis and we used points for that, also.

17 Q. And how many cruises has Nikki gone on with the  
18 child?

19 MS. HAYES: Objection to form.

20 A. I'm not sure.

21 Q. Pardon?

22 A. I'm not sure.

23 Q. Well, has she talked about it with you?

24 MS. HAYES: Objection to form.

25 A. I know they've taken cruises together. I don't

1 think we've ever discussed the number.

2 Q. Have you taken cruises with her?

3 A. I beg your pardon?

4 Q. Have you taken cruises with Nikki?

5 A. With Nikki, not with Logan.

6 Q. How many days a week does Nikki work now?

7 A. It's different every week.

8 Q. Well, this last week how many days did she  
9 work?

10 A. I'm not sure.

11 Q. Do you know how much money, generally, that she  
12 earned last year?

13 A. No, not exactly.

14 Q. Do you all share -- share information about  
15 earnings?

16 A. Casually.

17 Q. And you've been married now how long?

18 A. It will be two years in June.

19 Q. And --

20 MS. McKNIGHT: Here's the Highland Park  
21 police records. A.

22 MS. HAYES: Thank you.

23 MS. McKNIGHT: You can keep that.

24 Q. And do you consider yourself to be Nikki's  
25 rescuer?

1 A. No.

2 Q. Rescuing her from the evil Mr. Crockett?

3 A. No.

4 Q. And when did you decide that you wanted to be a  
5 parent? You said it wasn't a priority in your youth.

6 A. I'm not sure I understand your question.

7 Q. Well, have you -- you -- obviously you heard  
8 Ms. Ngo say that she wanted you to adopt Logan. You  
9 heard that, didn't you?

10 A. I did hear that.

11 Q. And that if she had her way, that she would get  
12 rid of Mr. Crockett by any means possible. You heard  
13 that, too, didn't you?

14 MS. HAYES: Objection to form.

15 A. No, I did not hear that.

16 Q. I assure you she said it. It's in her  
17 deposition.

18 A. That's not what I heard.

19 Q. Well, the court reporter did and I did, that  
20 she was working to set up a -- an abuse case against him  
21 because it was something she needed to do. Did you hear  
22 her say that?

23 MS. HAYES: Objection to form.

24 A. No, she did not say that.

25 Q. And you don't think she said that?

1 A. No, I don't.

2 Q. "Because it's something I needed to do."

3 A. Set up an abuse case against him?

4 Q. To establish an abuse case, document an abuse  
5 case against him. Yes.

6 And you're telling the Court and jury that  
7 your marriage to Ms. Ngo is a complete marriage, a  
8 normal marriage?

9 MS. HAYES: Objection to form.

10 A. Yes.

11 Q. And -- now, do you know anything about funds  
12 that she's had to borrow?

13 A. When?

14 Q. Oh, this year, 2020 or 2020.

15 A. I believe she did borrow some money from  
16 perhaps her brother.

17 Q. And which brother would that be?

18 A. I forgot.

19 Q. And how much money did she borrow from her  
20 brother?

21 MS. HAYES: Objection to form.

22 A. I'm not sure.

23 Q. And what was the purpose?

24 MS. HAYES: Objection to form.

25 A. I think it was to cover some -- some -- I think

1 part of it was to perhaps pay for some of her surgery.

2 Q. From her surgery?

3 A. I think, perhaps. I'm not a hundred percent  
4 sure.

5 Q. Do you maintain insurance for yourself and your  
6 wife, health insurance?

7 A. Yes. Yes.

8 Q. Is Nikki covered?

9 A. Yes.

10 Q. And did she -- now, you have said that  
11 Mr. Crockett creates drama everywhere. You reported  
12 that to Ms. Frenkle and to Ritzi, didn't you?

13 A. Yes.

14 Q. He did it at a soccer game when Logan was 4  
15 years old. Now, we're talking he's about to turn 9 now;  
16 is that right?

17 A. Yes.

18 Q. So you're reporting something that happened  
19 four years and some months ago.

20 A. Yes.

21 Q. And he did it at Prince of Peace school where  
22 he got Logan expelled because Mr. Crockett was abusive  
23 to school staff.

24 Now, please tell the Court and jury what  
25 school staff Mr. Crockett was abusive toward.

1           A. He scared Logan's teacher.

2           Q. Well, isn't it a fact, Mr. Cottingham, that  
3 Logan's teacher was subpoenaed by Miss -- Miss Nikki's  
4 counsel to too many court hearings and they said they  
5 would kick him out or expel him from school if they got  
6 subpoenaed again. Do you remember that?

7           A. No. My understanding was she was the only  
8 person from the school that could be. If others were  
9 subpoenaed, then that may happen. And I don't believe  
10 anyone else was actually subpoenaed from Ms. Ngo's side.

11          Q. Well, tell -- tell the Court and jury how  
12 Mr. Crockett got this child expelled from Prince of  
13 Peace school.

14          A. He scared the teacher.

15          Q. And which teacher did he scare?

16          A. I forget her name. But it was his teacher and  
17 she did testify to that in court about him ripping down  
18 some things in the classroom and other things like that.

19          Q. And --

20          A. And I believe that contributed along with the  
21 other subpoenas.

22          Q. And who issued the subpoenas?

23          A. I believe at that time it was an attorney Chuck  
24 Wood, perhaps.

25          Q. Named who?

1 A. Chuck Wood.

2 MS. HAYES: Prior to Randy.

3 MS. McKNIGHT: Oh, okay.

4 Q. And you're saying that Mr. Crockett's lawyer  
5 subpoenaed her to court?

6 A. No, I'm not saying that. I believe my  
7 understanding is that Ms. Ngo's attorney subpoenaed the  
8 teacher. Mr. Crockett's attorney subpoenaed other  
9 people. And that was what triggered the -- the --

10 Q. And who told you that?

11 A. That was my understanding from the case.

12 Q. From the case. But no. You don't just look at  
13 a case and get an understanding. Did somebody tell you  
14 that?

15 A. That was my understanding from -- from reading  
16 transcripts and from discussions with -- with Nikki and  
17 I believe discussions with -- with Nikki's counsel.

18 Q. And you're saying that a member of Prince of  
19 Peace was afraid of Mr. Crockett?

20 A. Yes.

21 Q. And Mr. Crockett, you say, created drama at  
22 summer camp. With whom did he create a drama at summer  
23 camp?

24 A. With the staff at the karate school.

25 Q. And what happened at the karate school?

1           A. He told the staff not to let the mother come  
2 and pick up the child on her possession day.

3           Q. And was it her possession day?

4           A. Yes, it was.

5           Q. And what happened?

6           A. They tried to -- to not release the child to --  
7 to his mother. Bless you.

8           Q. And -- now, is there anything in writing that  
9 you've seen that indicates that Mr. Crockett was the  
10 responsible person for the -- for the child being  
11 expelled from school?

12          A. I believe there was something that stated that  
13 due to, you know, the excessive subpoenas was the  
14 reasoning.

15          Q. And did you ever have that document and review  
16 it?

17          A. Yes. That's -- that's -- was my interpretation  
18 of what I read.

19          Q. Now, do you know anything at all, any  
20 incidents, since you've known Ms. Ngo, of a history of  
21 violent retaliation against her causing her serious  
22 bodily injury?

23          A. The incident I'm aware of was when she tried to  
24 flee his home and she was driving out of the driveway  
25 and he opened the car door and she ended up under the



1 car and was injured.

2 Q. And when did she first tell you that?

3 A. I don't remember exactly the date; but it was I  
4 would say probably late spring of 2018.

5 Q. And what did she tell you happened when you  
6 first met her?

7 A. At that point she didn't know what happened.  
8 She knew she was involved in a single car accident where  
9 her vehicle rolled over her, but she had no recollection  
10 of -- of what caused it.

11 Q. Have you read any other accounts that she gave  
12 people during the time of the earlier litigation?

13 A. Not that I recall.

14 Q. Have you read the social study that was done  
15 earlier?

16 A. I know I saw it at one point.

17 Q. And are you aware of Ms. Ngo going to the  
18 police, the Dallas police, to try to file charges  
19 against Mr. Cottingham -- or Mr. Crockett 6 years after  
20 the fact?

21 A. She went to report it, yes.

22 Q. Did you go with her?

23 A. Yes, I did.

24 Q. And what was said there?

25 MS. HAYES: Objection to form.

1           A. We asked to speak with someone because we had  
2 information from a motor-vehicle incident that had  
3 occurred many years prior, uh-huh.

4           Q. And do you remember who you talked with there?

5           A. No, I don't.

6           Q. And did they take a written statement from her?

7           A. No, they didn't. We -- we spoke with a number  
8 of different people. They kind of shuffled us around a  
9 little bit and they said because so much time has -- had  
10 passed, there was nothing they would do with the report.  
11 So, they didn't document anything.

12           Q. Now, you have joined Ms. Ngo in several  
13 different efforts to extract funds or get money from  
14 Mr. Crockett, haven't you?

15                           MS. HAYES: Objection to form.

16           A. I don't believe so, not that I'm aware of.

17           Q. Well, did you support her in a suit she filed  
18 to make Mr. Crockett provide a million-dollar life  
19 insurance policy?

20           A. I beg your pardon?

21           Q. Are you aware of her filing a motion for  
22 enforcement seeking to have Mr. Crockett provide a  
23 million-dollar life insurance policy?

24           A. Oh, enforcement of Logan's trust, yes.

25           Q. And Logan's trust --

1           A. I was aware of that.

2           Q. And what happened on that lawsuit?

3           A. I believe the outcome was tabled until the  
4 final trial. That was my understanding.

5           Q. Is that your understanding of it?

6           A. Is that not correct?

7                       MS. HAYES: She's asking if that's your  
8 understanding.

9           A. That is my understanding.

10          Q. And who gave you that understanding.

11          A. That's the understanding I had from being in  
12 court that day.

13          Q. And your understanding was that the statute of  
14 limitations had run and that the document that she was  
15 seeking to enforce -- an enforcement -- I mean, had to  
16 be brought -- a suit had to be filed within four months  
17 of any breach. Were you aware of that?

18          A. I was not aware of that.

19          Q. And are you aware of what the statute of  
20 limitations are on enforcing a contract?

21          A. I am not.

22          Q. But in your mind you think that that is still  
23 open for enforcement?

24          A. My understanding was that that was something  
25 that was -- I thought the understanding was that it had

1    been tabled and was something that would be adjudicated  
2    at final trial.

3           Q.  Is that the same understanding that you have  
4    about the lawsuit in the 68th District Court, that it  
5    was just tabled?

6                       MS. HAYES:  Objection to form.

7           A.  I'm not sure which -- which one --

8           Q.  The one you were a party to.

9           A.  No.  No.  The one I was --

10                      MS. HAYES:  Objection, nonresponsive after  
11    "no."

12           Q.  So, in your marriage to Ms. Ngo, are you still  
13    counting on money down the road from Mr. Crockett?

14                      MS. HAYES:  Objection to form.

15           A.  I have no idea.

16           Q.  Is that your hope?

17           A.  Sure.

18           Q.  How much money do you want from Mr. Crockett?

19                      MS. HAYES:  Objection to form.

20           A.  Attorneys' fees.

21           Q.  And what else?

22           A.  I think it would be great if -- if he fulfilled  
23    the obligations of the trust that he agreed to.

24           Q.  And a million-dollar life insurance?

25                      MS. HAYES:  Objection to form.

1           A. I had nothing to do with that amount. It was  
2 an amount he agreed to.

3           Q. Would you want a million-dollar life insurance  
4 policy, one of your exes, to have that?

5                       MS. HAYES: Objection to form.

6           A. If it was something I agreed to I would feel  
7 obligated to that, sure.

8           Q. Well -- so, you have hopes. Now, why would you  
9 want attorneys' fees from Mr. Crockett? Have you paid  
10 any of her attorneys' fees?

11          A. I have.

12          Q. And how much?

13          A. I have no idea.

14          Q. Well, is it ten thousand, a hundred thousand?  
15 What?

16          A. I have no idea at this point.

17          Q. Well, who have you paid them to?

18          A. I've paid them to her attorney.

19          Q. Okay. And when is the last payment you made?

20          A. In the last couple of weeks.

21          Q. How much?

22          A. \$5,000.

23          Q. And before that?

24          A. Payment for \$4,000 probably a month or so  
25 prior.

1 Q. Do you acknowledge, Mr. Cottingham, that  
2 Laurenston Crockett IV loves his dad and wants to be  
3 with him?

4 A. I acknowledge he loves his dad.

5 Q. Well, you're the one that wrote the letter  
6 saying I just can't understand why he prefers -- and  
7 that was not that long ago -- prefers to be with her --  
8 him instead of us.

9 A. That was about 16 months ago.

10 Q. Well, do you think he's changed his mind and  
11 wants to stay with you know?

12 A. Yes.

13 Q. You do?

14 A. Yes, I do.

15 Q. And what makes you believe that?

16 A. He's told me that.

17 Q. What has he told you?

18 A. He told me he prefers living with us.

19 Q. When did he do that?

20 A. He's done it on numerous occasions.

21 Q. And -- now, you and Ms. Ngo have recorded him  
22 several sometimes, haven't you?

23 MS. HAYES: Objection, form.

24 A. I have not.

25 Q. She has, hasn't she?

1           A. Yes, she has.

2           Q. And how does she go about that now? The  
3 recordings I've seen, does she turn it on in the middle  
4 of the conversation or does she edit it out later?

5                       MS. HAYES: Objection to form.

6           A. I have never been there when she's done it.  
7 So, I can't offer an answer to that.

8           Q. Now, does Ms. Ngo want to just keep  
9 Mr. Crockett supervised and continue to receive money  
10 from him?

11                       MS. HAYES: Objection to form. I'm going  
12 to instruct you not to answer that question based on my  
13 client's privilege of spousal immunity.

14           Q. Is that what you would like to see happen, Mr.  
15 Cottingham?

16           A. Can you ask the question again, please?

17           Q. Yeah. You have said that you just want to see  
18 Mr. Cottingham supervised --

19           A. I'm Mr. Cottingham.

20           Q. -- indefinitely. You're Mr. Cottingham. You  
21 want to see Mr. Crockett supervised indefinitely?

22           A. Yes, that's correct.

23           Q. But for her to continue to get money from him?

24           A. Are you talking about child support?

25           Q. Yeah.

1           A. I suppose. It's his child.

2           Q. Well, if it's his child and you're raising him  
3 and you've made all these statements and done all this  
4 writing to facilitate him being cut out, can you see how  
5 a Court or jury might not see that as equitable?

6                       MS. HAYES: Objection to form.

7           A. I guess if we had full custody forever. I  
8 don't know. I guess -- it's nothing I've ever  
9 considered. Those aren't big concerns for me.

10          Q. How much money do you earn annually, Mr.  
11 Cottingham?

12          A. I don't know what it was last year. It's been  
13 different every year I've been in business.

14          Q. Did you file a tax return for 2018?

15          A. Yes.

16          Q. How much did you -- what was your adjusted  
17 gross income?

18          A. I don't remember exactly.

19          Q. Well, you don't even have a ballpark figure;  
20 right?

21          A. Not off the top of my head.

22          Q. Well, stop and think about it. Have you done  
23 your taxes for 2019?

24          A. No, I haven't done those yet.

25          Q. Did you get your -- does your facility issue a



1 W-2 for you?

2 A. No.

3 Q. How do you figure out what your income is?

4 A. Through our bookkeeping system.

5 Q. Huh?

6 A. Through our bookkeeping system.

7 Q. How many employees do you have?

8 A. It varies because --

9 Q. How many do you have today?

10 A. I'm not exactly sure today. My manager handles  
11 hiring.

12 Q. You don't know, today, how many employees you  
13 have?

14 A. Not today.

15 Q. Sir, you're talking today about truth -- how  
16 important it is to be truthful and you do not know how  
17 many people are on your payroll as of today?

18 A. You know, I don't because we've got somebody  
19 that's transitioning out of our organization and moving  
20 back to Colorado. So, I don't know if they've already  
21 done that yet or not or if they are still on our  
22 payroll.

23 Q. Who do you have there normally?

24 A. It varies from a high of about 13 down to maybe  
25 around 9.

1 Q. Even with 9 people, how in the world do you  
2 board enough dogs to pay 9 to 13 people, pay your rent,  
3 pay your overhead and keep the place open?

4 A. Can you -- I'm not sure I understand your  
5 question.

6 Q. You don't have any idea how much you earn?

7 A. You know, I haven't done the finals. You know,  
8 our gross revenue for 2019 was just under \$700,000.

9 Q. And that was for 2019?

10 A. Uh-huh.

11 MS. HAYES: Yes? Is that a yes?

12 A. Yes. Yes.

13 Q. And do you have any plans to change your  
14 employment?

15 A. No. Well, I should ask what do you mean by  
16 change?

17 Q. Well, are you going to go into some other line  
18 of work?

19 A. Right now we have plans to open a second  
20 boarding facility.

21 Q. And where will that be?

22 A. Right now we are in the process of searching  
23 for property for it.

24 Q. How would you fund that?

25 A. I received a line of credit for \$2 million.

1 Q. And you've been approved for \$2 million; is  
2 that right?

3 A. That's right.

4 Q. And who approved you?

5 A. Live Oak Bank.

6 Q. And when did Live Oak Bank approve you for \$2  
7 million?

8 MS. HAYES: Objection, form.

9 A. Late last fall.

10 Q. And what did you have for collateral?

11 A. My business.

12 Q. And you're telling the Court and jury that a  
13 dog kennel on Harry Hines that grosses 700,000 a year --  
14 a little less than 700,000 a year is approved for a  
15 \$2-million loan by which bank?

16 A. Live Oak Bank.

17 MS. HAYES: Objection to form.

18 Q. And did you fill out a financial statement with  
19 them?

20 A. Yes.

21 Q. And surely when you were filling that out you  
22 did list your income, didn't you?

23 A. Yes.

24 Q. And how much did you tell them you made?

25 A. I don't have those documents in front of me. I

1 don't remember exactly.

2 Q. Well, in order to get a \$2-million loan, did  
3 you furnish them documents substantiating that?

4 A. Many, many documents.

5 MS. McKNIGHT: Go ahead and mark that.

6 (EXHIBIT NOS. 24, 25 and 26 WERE MARKED)

7 Q. Show you Exhibit No. 25 and ask you is that a  
8 photo that you sent to Mr. Crockett?

9 A. No, I did not.

10 Q. Have you ever seen that photo before?

11 A. Yeah.

12 Q. And 26, is that emails that you sent?

13 A. No, I did not.

14 Q. Did Nikki send that, and did you edit it for  
15 her?

16 A. It appears as though she sent it and I  
17 probably -- I'm sure I looked at it and -- yeah.

18 Q. Does she ever send anything out without you  
19 looking at it?

20 MS. HAYES: Objection to form.

21 A. I'm sure she has.

22 Q. Show you No. 24. Are you familiar with that  
23 photograph?

24 A. No.

25 Q. Do you recognize Laurenston's backpack?

1 A. Yes.

2 Q. And was he not allowed to take it with him?

3 MS. HAYES: Objection to form.

4 Q. Did you discuss that with your wife?

5 A. He always had his backpack with him. I'm not  
6 -- I have no idea what this is. It says -- it looks  
7 like his backpack sitting on the ground.

8 Q. You have no --

9 A. I didn't take -- I didn't take that photograph.

10 Q. Well, I understand you didn't. But did your  
11 wife tell you that her sister put his backpack on the  
12 ground and left it with him crying?

13 MS. HAYES: Can we get a timeframe?

14 MS. McKNIGHT: I don't know the timeframe.

15 MS. HAYES: Well, were they married or not  
16 married? I don't want him discussing any communications  
17 --

18 MS. McKNIGHT: No, I don't know whether  
19 they were married or not.

20 MS. HAYES: Okay.

21 A. I don't know all the details.

22 Q. You don't know?

23 A. I don't know the details, no.

24 Q. And you don't know anything at all about it?

25 A. I don't -- I don't know when you're referring

1 to.

2 Q. Okay. Is this \$2-million loan going to be in  
3 your name alone or does Nikki cosign?

4 A. That's a good question. I don't know. I had  
5 to provide her information as well.

6 Q. And what information did you provide?

7 A. Financial information.

8 Q. And her tax returns?

9 A. I believe so, yes.

10 Q. So you do have an idea how much your wife  
11 earns, don't you?

12 A. I provided tax returns. I didn't memorize the  
13 amounts on them.

14 Q. Well, did you look at them before you tendered  
15 them to the bank seeking a \$2-million loan?

16 A. I didn't look at the amounts on hers, no.

17 Q. You just took them in and said, "Here's my  
18 wife's tax returns"?

19 A. Yeah.

20 Q. Who is the financial officer you were dealing  
21 with over there?

22 A. There's a couple of people I'm dealing with.

23 Q. Who is your loan officer?

24 A. I don't remember off the top of my head their  
25 names.

1 Q. How many years' income did you have to give  
2 them to qualify for a \$2-million loan?

3 A. I believe these last 3 years.

4 Q. Just 3 years. Now, the resumés and things that  
5 I've seen, you list that you do have an MBA. That's not  
6 true, is it?

7 A. I'm very close to it.

8 Q. Do you have an MBA, sir?

9 A. No.

10 Q. Okay. And actually --

11 A. A resumé.

12 Q. You talk --

13 A. You have a resumé?

14 Q. Well, let's look at No. 12. (Reading) Highly  
15 accomplished top-performing professional with extensive  
16 experience in strategic new business development and  
17 client satisfaction, goes on and on. And it does have a  
18 resumé back here. And it says --

19 A. Is that a resumé?

20 Q. Well, it's what you have online. "Master of  
21 business administration MBA." Is this what you post  
22 online, sir? Was that posted by you?

23 A. It may be something that's posted on LinkedIn.

24 Q. Well, are you saying that Mr. Crockett maybe  
25 created that and did that to try to harm you?

1 A. No. No.

2 MS. HAYES: Objection to form.

3 A. No. No.

4 Q. Did you create that?

5 A. If this is what's on LinkedIn, yes.

6 Q. And when did you create it?

7 A. I've been on LinkedIn for quite a while.

8 Q. Why would you say you have an MBA if you don't?

9 A. Because most people I've met with, when I  
10 explain to them I was two credits short, the people in  
11 the placement office from my university said you should  
12 put down that you have the MBA and then when you  
13 interview with people, you can discuss that you are two  
14 classes short.

15 Q. Now, let me hear that again. You say that your  
16 university -- people from your university told you to go  
17 ahead and say that you have an MBA. Who was that?

18 A. This was back in 1990.

19 Q. I said who, not when.

20 A. I don't remember their name from 1990.

21 Q. And it's been 1990 and you've not bothered to  
22 pick up the two hours?

23 A. I have not.

24 Q. But somebody back in 1990 told you just go  
25 ahead and say you have an MBA?



1 A. Yes.

2 Q. Actually, you did your studying online, didn't  
3 you?

4 A. In 1990? No, I've done no --

5 Q. At the university --

6 A. I've done no studying online.

7 Q. You did not --

8 A. I'm not aware that any colleges offered online  
9 classes in 1990.

10 Q. And your testimony here under oath is that you  
11 were a full-time student studying at the university of  
12 whatever it was, North Dakota, and in the MBA program?

13 A. Yes, that's correct.

14 Q. And how many years did you attend?

15 A. Graduate school?

16 Q. Yes.

17 A. Two years.

18 Q. And did you work at another job while you  
19 attended?

20 A. Yes, I did.

21 Q. And where did you go to class?

22 A. On campus.

23 Q. Regular, on-campus classes?

24 A. Yes. This is 1990.

25 Q. You said that, sir; but I'm just asking. And

1 did you maintain grades that were acceptable to keep you  
2 in the program?

3 A. Yes.

4 Q. But you're maintaining that your school told  
5 you just go ahead and say you have an MBA?

6 MS. HAYES: Objection to form.

7 A. Yes.

8 Q. When do you plan to consummate this \$2-million  
9 loan?

10 A. After we find a suitable location.

11 Q. And where are you looking for the suitable  
12 location?

13 A. We are looking all throughout DFW.

14 Q. Pardon?

15 A. We are looking in various areas of DFW.

16 Q. And are you going to maintain the one you have  
17 in -- on Harry Hines?

18 A. Yes.

19 Q. And I'm going to ask you -- I'm getting ready  
20 to wind up. But do you have any living human being that  
21 -- whose name and address and phone number you can give  
22 who has heard Lauriston Crockett scream at you, swear or  
23 use the F-word, is there any such human being?

24 MS. HAYES: Objection to form.

25 A. Yes.

1 Q. Who?

2 A. Logan Crockett.

3 Q. And has he told anybody that?

4 A. I'm not aware what he's done.

5 Q. Well, have you seen it anywhere where anybody  
6 says Logan Crockett says that?

7 A. No, I haven't seen it anywhere.

8 Q. Now, this new -- this new kennel that you're  
9 going to buy with this \$2-million loan, is Nikki Ngo  
10 going to own half of that?

11 A. I'm not sure.

12 Q. Well, you're married to her, aren't you?

13 A. Yes.

14 Q. And you're buying it during the marriage?

15 A. Yes.

16 Q. And you're not sure whether she'll own an  
17 interest in it or not?

18 A. I'm not.

19 Q. Well, if you live in Texas, sir, she will.

20 MS. HAYES: Objection to form.

21 Q. She'll own half of it.

22 A. Okay.

23 Q. Have you made any payments to Dr. Raphael?

24 Have you ever met him?

25 A. I have met him. I'm not sure if I made

1 payments or not.

2 Q. How much of her surgery -- her breast surgery  
3 did the insurance cover?

4 MS. HAYES: Objection to form.

5 A. I'm not sure.

6 Q. Well, have you gotten a bill from him?

7 MS. HAYES: How is any of this relevant to  
8 child custody?

9 MS. MCKNIGHT: Well, it's certainly  
10 relevant to their plans for the future and it's  
11 relevant.

12 MS. HAYES: Her breasts are absolutely  
13 irrelevant.

14 MS. MCKNIGHT: Well, where she says --  
15 where she says, "I've had back surgery" and -- and I  
16 look for her back surgeon and he's a plastic surgeon, I  
17 just ask questions.

18 MS. HAYES: That has nothing to do with  
19 finances.

20 MS. MCKNIGHT: Yeah, we'll see.

21 Q. But you don't know -- you don't know how much  
22 you all owe him?

23 A. I don't believe we owe him anything.

24 Q. But you don't know?

25 A. I'm pretty sure we don't owe him anything.

1 Q. How much will it cost for Laurenston IV to get  
2 his dental work finished?

3 A. I don't remember.

4 Q. Well, were you ever told?

5 A. Yeah. They printed out a estimate with some  
6 ranges.

7 Q. And how did Ms. Ngo finance the first half of  
8 it, her part?

9 A. I'm not exactly sure.

10 Q. You don't know if she took out a loan?

11 A. I'm not exactly sure.

12 Q. You don't discuss that kind of thing with her?

13 A. Sometimes we do. Sometimes we don't. We just  
14 take care of things.

15 Q. Well, did you step in and just help her take  
16 care of her share of that?

17 A. No, I don't believe so.

18 Q. Do you know whether you did or not?

19 A. I'm not sure, no.

20 Q. Would you say you have an unusual marriage, Mr.  
21 Cottingham?

22 MS. HAYES: Objection, form.

23 A. No.

24 Q. And other than this child Logan, is there  
25 anybody that you can think of that has any proof of your

1 allegations, any documents, any proof of all these  
2 allegations that you, sir, have written to Jennifer  
3 Frendle, to Ritzi and Vickie Alexander?

4 A. I -- I haven't written anything to Jennifer  
5 Frendle.

6 Q. That you carried into her, sir. I'm so sorry.  
7 That you carried in and gave her that ended up in her  
8 folder?

9 A. Sure. There are other witnesses to many of  
10 these things.

11 Q. Well, I've asked you for them. You've given me  
12 Logan Crockett.

13 A. You asked me about allegations. You weren't  
14 specific as to...

15 Q. I was very specific about --

16 A. Can you repeat your question, then, please?

17 MS. HAYES: Objection to form.

18 Q. He's a conman and he had to pay off a  
19 five-figure loan of -- five-figure judgment. Now, who  
20 is the witness to that?

21 A. Frank Bonner.

22 Q. And where is Frank Bonner?

23 MS. HAYES: Objection to form.

24 Q. How does he know?

25 MS. HAYES: Objection to form.

1           A. He's mentioned in all the documents. He worked  
2 for Genostim. He lived with Lauriston Crockett.

3           Q. Did he show you anything?

4           A. No.

5           Q. Did you get online, sir? Now, you've got an  
6 MBA, almost. Did you get online and check to see if  
7 there were any lawsuits and judgments where Laurenston  
8 Crockett -- before you published this information?

9           A. I -- I did see that he was involved in a  
10 lawsuit, yes.

11          Q. Well, did you follow up and see the disposition  
12 of that lawsuit, sir? You do know how to do that, don't  
13 you?

14          A. I saw that a settlement was reached.

15          Q. And did you print it off?

16          A. No.

17          Q. You're saying you saw a settlement. In what  
18 lawsuit?

19          A. The one with the people that Mr. Crockett tried  
20 to sell Genostim to.

21          Q. That's not very specific. What settlement was  
22 reached, sir?

23                   MS. HAYES: Objection to form.

24          Q. You did say you saw a settlement. You're here  
25 under oath. You say you saw a settlement.

1           A. I saw that a settlement was reached.

2           Q. And did he pay money?

3           A. Mr. Bonner --

4                       MS. HAYES: Objection to form.

5           Q. I'm asking you what you saw online, not what  
6 you say a Mr. Bonner said. Did you -- you were sitting  
7 there looking at your computer, I assume.

8           A. It was a computer in the courthouse.

9           Q. Did you look at any dollar amounts?

10          A. There were no details disclosed.

11          Q. Anything else that you -- on his being a  
12 racist, do you have any documents other than that one  
13 document there that I produced to you from Ms. Frenkle's  
14 file, do you have any other documents that indicate that  
15 Mr. Crockett is a racist?

16          A. I'm -- I'm not sure what Ms. Ngo has.

17          Q. Well, I've asked her in discovery to produce  
18 all documentation on racism, on homophobe status, all of  
19 that.

20                       So, Mr. Cottingham, if Ms. Ngo prevails in  
21 this litigation, as far as you're concerned, the status  
22 quo will just go on like it is; is that right?

23          A. I think that's what would be best for Logan.

24          Q. And that's what you believe?

25          A. Yes.



1 Q. And, again -- I didn't ask you: Have you ever  
2 raised a child?

3 A. Prior to Logan?

4 Q. Yes. You've not raised Logan yet.

5 A. No.

6 Q. You came in the picture when he was 4, and he's  
7 now 8. So, have you ever raised a child?

8 A. No.

9 Q. And you're how old?

10 A. I'm 57.

11 MS. McKNIGHT: No further questions.

12 MS. HAYES: I'll reserve.

13 THE VIDEOGRAPHER: We are off the record at  
14 2:31 p.m. End of deposition.

15 (THE PROCEEDINGS WERE CONCLUDED)

16

17

18

19

20

21

22

23

24

25

1 CHANGES AND SIGNATURE

2 WITNESS NAME: ROBERT COTTINGHAM

3 DATE OF DEPOSITION: February 21, 2020

4 PAGE LINE CHANGE REASON

5 \_\_\_\_\_

6 \_\_\_\_\_

7 \_\_\_\_\_

8 \_\_\_\_\_

9 \_\_\_\_\_

10 \_\_\_\_\_

11 \_\_\_\_\_

12 \_\_\_\_\_

13 \_\_\_\_\_

14 \_\_\_\_\_

15 \_\_\_\_\_

16 \_\_\_\_\_

17 \_\_\_\_\_

18 \_\_\_\_\_

19 \_\_\_\_\_

20 \_\_\_\_\_

21 \_\_\_\_\_

22 \_\_\_\_\_

23 \_\_\_\_\_

24 \_\_\_\_\_

25 \_\_\_\_\_

1 I, ROBERT COTTINGHAM, have read the foregoing  
2 deposition and hereby affix my signature that same is  
3 true and correct, except as noted above.

4

5

\_\_\_\_\_

6

ROBERT COTTINGHAM

7

THE STATE OF \_\_\_\_\_)

8

COUNTY OF \_\_\_\_\_)

9

10 Before me, \_\_\_\_\_, on this day

11 personally appeared ROBERT COTTINGHAM, known to me (or

12 proved to me under oath or through

13 \_\_\_\_\_) (description of identity

14 card or other document) to be the person whose name is

15 subscribed to the foregoing instrument and acknowledged

16 to me that they executed the same for the purposes and

17 consideration therein expressed.

18 Given under my hand and seal of office this

19 \_\_\_\_\_ day of \_\_\_\_\_, \_\_\_\_\_.

20

21

\_\_\_\_\_

22

NOTARY PUBLIC IN AND FOR

23

THE STATE OF \_\_\_\_\_

24

COMMISSION EXPIRES: \_\_\_\_\_

25

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

NO. DF-13-06713

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

REPORTER'S CERTIFICATION  
DEPOSITION OF ROBERT COTTINGHAM  
February 21, 2020

I, Wendy Golding, Certified Shorthand Reporter in  
and for the State of Texas, hereby certify to the  
following:

That the witness, ROBERT COTTINGHAM, was duly sworn  
by the officer and that the transcript of the oral  
deposition is a true record of the testimony given by  
the witness;

That the deposition transcript was submitted on  
\_\_\_\_\_to the witness or to the attorney  
for the witness for examination, signature and return to  
me by\_\_\_\_\_;

That the amount of time used by each party at the  
deposition is as follows:

MARY D. McKNIGHT - 3 HOURS: 20 MINUTE(S)  
KRIS BALEKIAN HAYES - 00 HOURS:00 MINUTE(S)

That pursuant to information given to the  
deposition officer at the time said testimony was taken,

1 the following includes counsel for all parties of  
2 record:

3 MARY D. McKNIGHT, Attorney for Petitioner  
4 KRIS BALEKIAN HAYES, Attorney for Respondent

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

10 Further certification requirements pursuant to Rule  
11 203 of TRCP will be certified to after they have  
12 occurred.

13 Certified to by me this \_\_\_\_\_ of \_\_\_\_\_, 2020.



14  
15 *Wendy Golding*

16 WENDY GOLDING, CSR # 1942  
17 Expiration: 2/28/2021  
18 LEGAL SOLUTIONS COURT REPORTING  
19 Firm Registration No. 424  
20 2626 Cole Avenue, Suite 300  
21 Dallas, Texas 75204  
22 (866)830-1717(866) 651-4292 Fax  
23 www.LegalSolutionsCourtReporting.com  
24  
25

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

FURTHER CERTIFICATION UNDER RULE 203 TRCP

The original deposition \_\_\_\_\_ was \_\_\_\_\_ was not returned to the deposition officer;

If returned, the attached Changes and Signature page contains any changes and the reasons therefore;

If returned, the original deposition was delivered to \_\_\_\_\_, Custodial Attorney;

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

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

Certified to by me this \_\_\_\_ day of \_\_\_\_\_, 2020.

*Wendy Golding*

WENDY GOLDING, CSR # 1942  
Expiration: 2/28/2021  
LEGAL SOLUTIONS COURT REPORTING  
Firm Registration No. 424  
2626 Cole Avenue, Suite 300  
Dallas, Texas 75204  
(866)830-1717(866) 651-4292 Fax  
www.LegalSolutionsCourtReporting.com