

Exhibit 7

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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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HOWARD K. STERN,

Plaintiff,

v. Civ. Action No. 07-CV-8536 (DC)

RITA COSBY and HACHETTE BOOK
GROUP USA, INC. d/b/a Grand Central
Publishing, and JOHN OR JANE DOE,

Defendants.

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DEPOSITION OF POL ATTEU
Los Angeles, California
Wednesday, May 28, 2008
CONFIDENTIAL

Reported by:
SUSAN A. SULLIVAN, CSR #3522, RPR, CRR
JOB NO. 16536

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 2 **saw the baby?**
 3 A Yes.
 4 **Q And filmed it?**
 5 A Yes.
 6 **Q Are you familiar with that?**
 7 A Yes.
 8 **Q Did you understand that Howard had**
 9 **negotiated the deal to give "ET" the exclusive rights**
 10 **to film that event?**
 11 A Yes.
 12 **Q And what did you know about that deal?**
 13 A Well, "ET" basically had exclusive to
 14 anything and everything.
 15 **Q Did you understand that Howard had**
 16 **negotiated an omnibus agreement with "ET" where they**
 17 **had exclusive rights to all the events that were to**
 18 **occur?**
 19 A Yeah. But he would renegotiate each one
 20 separately in between too.
 21 **Q And how did you know he would renegotiate**
 22 **each one separately in between?**
 23 A I was there.
 24 **Q So you heard Howard negotiating with "ET"?**
 25 A No, I heard all the "ET" people talking
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 2 because I was with them before Howard even got there.
 3 **Q And where were you? Is this in Florida or**
 4 **The Bahamas?**
 5 A This is in The Bahamas before the reunion.
 6 I was there in the house.
 7 **Q Okay. What "ET" are we talking about?**
 8 A Linda Bell Blue.
 9 **Q Linda Bell Blue.**
 10 **Do you know what her role was with "ET"?**
 11 A She is the one that calls the shots.
 12 **Q Was she a producer, to your knowledge?**
 13 A Yes, I think so.
 14 **Q What was she saying about the deal, what do**
 15 **you recall?**
 16 A She was making sure that who was going to
 17 interview, what they were going to get, what they
 18 needed.
 19 **Q Did you have an understanding from Linda or**
 20 **anybody else from "ET" as to how much money they were**
 21 **paying for these interviews?**
 22 A They never talked about money.
 23 **Q So your understanding as to the amount of**
 24 **money came from hearing Howard speak about it?**
 25 A Yes.
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 2 **Q Did you have an understanding as to how**
 3 **much "ET" paid for these rights?**
 4 A A million dollars.
 5 **Q And do you know where that money went to?**
 6 A At the time I think it went to Florida or
 7 to his family.
 8 **Q To Howard's family?**
 9 A To Howard's family.
 10 **Q And by Howard's family, was that his**
 11 **parents --**
 12 A Yes.
 13 **Q -- or his sister?**
 14 A I think the parents because he needed to
 15 borrow money from the parents in order for him to be
 16 able to -- and he kept telling his mother, "The money
 17 is coming so as soon as it comes, I'm going to pay
 18 you back."
 19 **Q So did you understand that the money was**
 20 **being sent directly from "ET" to Howard's parents?**
 21 A Yes.
 22 **Q And what did you base that understanding**
 23 **on?**
 24 A Because the mother was paying for
 25 everything but it takes I don't know how long for
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 2 them to get the money in. They were actually saying,
 3 "We're going to rush this, we're going to get the
 4 money to you faster."
 5 **Q Because Howard's mother was concerned about**
 6 **the money, about paying for things?**
 7 A No, they just knew that Howard actually
 8 needed the money so that he could, you know, pay
 9 everybody.
 10 **Q And do you know whether that money was**
 11 **wired somewhere?**
 12 A I can't remember.
 13 **Q Did you ever overhear any phone**
 14 **conversation in which Howard was giving numbers to a**
 15 **wired account or a bank account or anything like**
 16 **that?**
 17 A Yes.
 18 **Q What did you overhear?**
 19 A To wire money into a particular account but
 20 I don't know if that was for him or the parents or --
 21 I don't know.
 22 **Q So you are not certain as to which, whose**
 23 **account those numbers were associated with?**
 24 A No, no.
 25 **Q Did you have a sense when Anna was alive**
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2 **Q And you knew Anna pretty well, right?**

3 A I think so.

4 **Q You considered yourself part of Anna's**

5 **inner circle, right?**

6 A I think so.

7 **Q And you, after Anna died you were out in**

8 **the public with Patrik making various media**

9 **appearances, correct?**

10 A After Anna died.

11 **Q After Anna had died.**

12 A No.

13 **Q You do remember appearing on a number of**

14 **television shows?**

15 A Way after, yeah.

16 **Q After Anna had died.**

17 A Yes.

18 **Q So you were making media appearances after**

19 **Anna had died?**

20 A Yes.

21 **Q And Rita Cosby never contacted you at any**

22 **time between Anna's death and the publication of**

23 **Blonde Ambition, correct?**

24 MS. KEUSSEYAN: Objection; asked and

25 answered.

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2 You can answer.

3 A No.

4 **Q No, she didn't contact you?**

5 A No.

6 **Q Do you know whether she contacted any**

7 **members of what you previously described as Anna's**

8 **inner circle?**

9 A I don't know.

10 **Q Did Rita Cosby talk with you about any of**

11 **the sources she used for Blonde Ambition?**

12 A I never asked her.

13 **Q When Patrik read to you the first chapter**

14 **of Blonde Ambition do you remember hearing names in**

15 **that chapter and thinking to yourself, "Oh, I know**

16 **that person"?**

17 A I can't remember the chapter at all.

18 **Q Did you ever hear of someone by the name of**

19 **Jackie Hatten?**

20 A Yes.

21 **Q Who is she?**

22 A I don't know.

23 **Q When did you first hear of Jackie Hatten?**

24 A When she was on T.V. saying that she was

25 the best friend and I never heard of her.

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2 **Q And from the time that -- well, do you**

3 **remember when Jackie Hatten was on T.V. saying that**

4 **she was Anna's best friend?**

5 A I can't -- not the day, no.

6 **Q Was it after Daniel died but before Anna**

7 **had died?**

8 A Yes.

9 **Q Does that sound right?**

10 A Yes.

11 **Q Did you talk with Anna about Jackie Hatten?**

12 A I can't remember.

13 **Q The entire time that you knew Anna**

14 **beginning in 2002-2003 until the time that Jackie**

15 **Hatten appeared on television, you had never heard**

16 **her name mentioned?**

17 A No.

18 **Q Did you?**

19 A That's probably why I never asked. She was

20 inconsequential.

21 **Q Did you ever hear of somebody by the name**

22 **of Mark Hatten?**

23 A (No audible response.)

24 **Q Did you ever hear about Anna dating some**

25 **guy who ended up going to jail?**

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2 A No.

3 **Q Did you hear about Jackie Hatten showing up**

4 **at Horizons?**

5 A Yes.

6 **Q Tell me what you know about that.**

7 A Well, I wasn't there. And I guess Patrik

8 answered the door and he didn't know who it was so

9 he -- well, the only thing we did, we never really

10 opened the door to anybody and then he asked who is

11 this and Anna goes, "Send her away, I don't want to

12 see her," something like that, and then Moe just kind

13 of handled it. And he would -- he kind of saw what

14 was going on on the monitor.

15 **Q Are you familiar with the layout of Anna's**

16 **Studio City house?**

17 A Yeah.

18 **Q Where were the -- where was Daniel's**

19 **bedroom in the Studio City house?**

20 A Downstairs.

21 **Q And where was Anna's bedroom?**

22 A Way upstairs.

23 **Q So there was a floor separating Daniel and**

24 **Anna's bedroom, right?**

25 A Yes.

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2 Q Was there anyplace in Daniel's bedroom, if

3 you were in Daniel's bedroom was there anyplace where

4 you could see the entrance to Anna's bedroom?

5 A What's the question?

6 Q If you were standing in Daniel's bedroom on

7 the first floor, was there anyplace in Daniel's

8 bedroom that you could be where you could see the

9 entrance to Anna's bedroom on the third floor?

10 A Not to the front door, no.

11 Q And if you were in Daniel's bedroom on the

12 first floor was there any way that you could see the

13 entrance, the main entrance to the house?

14 A Not if you are inside his room, no.

15 Q No place inside his room that you could see

16 that?

17 A No.

18 Q Was there anyplace inside his room where

19 you could see any entrance to the house?

20 A No.

21 Q So if you were in --

22 A Yeah. You could see the garage.

23 Q The garage. From Daniel's room?

24 A Uh-huh. The hallway.

25 Q But as far as the doorways, no; potential

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2 Anna?

3 A Very much.

4 Q And that love was reciprocal, right, so

5 much so that Daniel also loved Howard?

6 A As an older brother.

7 Q And that Anna loved Howard as well?

8 A Yes.

9 Q Do you remember giving an interview for an

10 "E!" television special, three-hour special about

11 Anna, "The Life and Death of Anna Nicole"?

12 A Yes.

13 Q Do you remember telling the interviewer

14 that Howard and Anna have been committed to each

15 other on so many levels for so many years?

16 A Possibly.

17 Q What did you mean by their commitment to

18 each other on so many levels? What levels were you

19 talking about?

20 A The fact that he was a friend, he was an

21 attorney, he was a gofer, whatever it may have been.

22 Q Would you consider Howard Anna's protector?

23 A Yes.

24 Q He was always trying to protect her?

25 A Yes.

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2 entrances, no?

3 A No.

4 Q I think you consider Howard to have been a

5 person in Anna's inner circle, right?

6 A Yes.

7 Q And Howard spent a significant amount of

8 time with Anna and Daniel, right?

9 A Yes.

10 Q And a significant time with Anna and Daniel

11 when you weren't around, right?

12 A Yes.

13 Q And you know that Howard traveled with

14 Anna.

15 A Yes.

16 Q And he did Anna's legal work --

17 A Yes.

18 Q -- for her, right?

19 And they did, Howard and Anna spent a lot

20 of time just doing normal things, hanging out at the

21 house together, right?

22 A Yes.

23 Q You would agree that Howard loved Daniel?

24 A Yes.

25 Q You would also agree that Howard loved

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2 Q Did you ever see Howard exhibit any

3 affection to anyone?

4 A I don't understand your question.

5 Q Physical affection; a hug, a kiss.

6 A Yeah.

7 Q And did you see -- was this friendly

8 affection?

9 A Yes.

10 Q Would you describe Howard as ever

11 exhibiting any romantic affection?

12 A No.

13 Q Have you ever met Ford Shelley or

14 communicated with Ford Shelley?

15 MS. McNAMARA: Other than what he has

16 testified to?

17 MR. LANTTA: Let me lay a foundation here.

18 MS. McNAMARA: I'm sorry.

19 MR. LANTTA: Let me get it out. I will get

20 you there.

21 Q Other than the time that you spoke with him

22 at horizons the day after Anna died.

23 A What's the question?

24 Q Have you ever communicated with Ford

25 Shelley other than the day at Horizons, which was the

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2 **Q Do you know how Daniel felt about Ben**

3 **Thompson?**

4 A No.

5 **Q Are you aware of any facts that would lead**

6 **you to believe that Howard was responsible for**

7 **Daniel's death?**

8 A Ask me the question again?

9 **Q Are you aware of any facts that would lead**

10 **you to believe that Howard was responsible for**

11 **Daniel's death?**

12 A I don't understand your question.

13 **Q Let's try it this way.**

14 **Do you think Howard was responsible for**

15 **Daniel's death?**

16 A No.

17 **Q And you have no reason to -- strike that.**

18 **You are not aware of anything, any facts**

19 **that would suggest that Howard was responsible for**

20 **Daniel's death, correct?**

21 A No.

22 **Q You had talked about Anna yelling a number**

23 **of times "You did this, you caused this," with**

24 **respect to Daniel's death.**

25 A Yes.

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2 **Q Do you remember Anna not really believing**

3 **that Daniel was dead?**

4 A Yes.

5 **Q Tell me about that.**

6 A Well, every day she thought that he was

7 going to walk in through the door. Every time she

8 saw his picture she thought he was there. She would

9 have nightmares. She would see him on T.V. and think

10 that or hear his voice, actually, and know that he

11 was there.

12 **Q And she felt that up through and at the**

13 **funeral too, right?**

14 A More at the funeral.

15 **Q That Daniel was going to come back; that he**

16 **wasn't really dead.**

17 A Yes.

18 **Q In fact, she thought Daniel was just**

19 **sleeping, right?**

20 A Yes.

21 **Q And at the funeral she even tried to crawl**

22 **into Daniel's coffin, right?**

23 A Yes.

24 **Q And had to be restrained.**

25 A Well, she wanted to exchange places with

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2 **Q Okay. And you felt that those comments**

3 **were directed at Howard?**

4 A Yes.

5 **Q Why do you feel like they were directed at**

6 **Howard?**

7 A Because he was the only thing that was

8 there closest to Anna and he probably knew and she

9 knew.

10 **Q They knew what?**

11 A Whatever happened or did not happen.

12 **Q But you know that Anna would not have**

13 **allowed Howard to remain in her life if she felt**

14 **Howard was responsible for Daniel's death, right?**

15 MR. MAYNARD: Objection.

16 A Yes.

17 **Q She would not have allowed him to stay in**

18 **her life, correct?**

19 A No.

20 **Q You were at Daniel's funeral, right?**

21 A Yes.

22 **Q Do you remember some of the characteristics**

23 **that Anna was exhibiting at the funeral?**

24 A The fact that she was in grief. That's

25 light.

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2 Daniel.

3 **Q It was when she was trying to crawl into**

4 **the coffin with Daniel that she was sedated, right?**

5 A No, it was after.

6 **Q It was after she tried to crawl into the**

7 **coffin?**

8 A Yes.

9 **Q Tell me, walk me through that sequence of**

10 **events.**

11 A The coffin was opened I think twice because

12 she couldn't go through the process so she was

13 basically screaming and yelling like any parent would

14 and feeling the pain of losing a child.

15 **Q And Troy Hollier or Moe Brighthaupt pulled**

16 **her off the casket, right?**

17 A Well, yeah. They were the strongest ones.

18 Anna is pretty strong.

19 **Q And it was then that she was sedated,**

20 **right?**

21 A After then, right.

22 **Q You talked about a photograph of Daniel**

23 **after Daniel had died, right?**

24 A Yeah.

25 **Q Where did you see that photo?**

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 2 medications for those seizures?
 3 A Yeah.
 4 Q Do you recall what sort of anti-seizure
 5 medication she was taking?
 6 A I have no idea.
 7 Q But you believe that she was taking
 8 anti-seizure medication?
 9 A Yes.
 10 Q Any other medications?
 11 A I don't know.
 12 Q Do you know whether the medications that
 13 Anna was taking ever affected her mental state?
 14 A No.
 15 Q Sometimes when you take prescription
 16 medications the warnings on them say may cause
 17 drowsiness, dizziness.
 18 A Yes.
 19 Q Do you know if Anna's medications had any
 20 warning labels that affected her mental state?
 21 A Sometimes.
 22 Q How would her medications affect her mental
 23 state?
 24 A She would want to be home when she took
 25 them sometimes. She would want to be.

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 2 lastheplace.com?
 3 A No.
 4 Q You would agree that if someone were to say
 5 that Anna was on drugs 24 hours a day all the time,
 6 that would be false, right?
 7 A Yes.
 8 Q Did you ever see Anna play with Shelby?
 9 A Play with Shelby?
 10 Q Play with Shelby.
 11 A Well, she is not a little kid.
 12 Q When Anna first --
 13 A They spent girl time together, yes.
 14 Q When Anna first met Shelby, how old was
 15 Shelby?
 16 A About 10.
 17 Q Did you ever see Anna pretend to be a
 18 little girl around Shelby?
 19 A Yeah.
 20 Q Describe that for me, please.
 21 A Well, I don't understand. Like I don't
 22 understand. Do you want me to tell you like what
 23 they did?
 24 Q Yeah.
 25 A They would paint their nails, they would

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 2 Q Do you know, other than anti-seizure
 3 medications, any other than prescription meds Anna
 4 was taking?
 5 A There were other ones but I don't know what
 6 they are.
 7 Q You had heard in the media, correct, that
 8 Anna was a drug addict, right?
 9 A Yes.
 10 Q Did you agree with that statement?
 11 A It depends upon what kind of drugs you are
 12 talking about.
 13 Q Well, do you think she was an illegal drug
 14 addict?
 15 A Not that I know of.
 16 Q Do you think she was a prescription drug
 17 addict?
 18 A I don't know if that's a drug addict. I
 19 know she took them. I don't know if that's an
 20 addict.
 21 Q Did you see what you perceived to be an
 22 abuse of drugs by Anna?
 23 A No.
 24 Q Do you remember giving an interview in
 25 April, just a few short months ago, to

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 2 play with makeup, they would talk about boys and I
 3 would have to shut that down. She would tell Shelby
 4 about how she was abused and not to let anybody abuse
 5 her, just do stuff.
 6 Q Did you see Anna ever act childlike,
 7 though, like a little girl?
 8 A Yeah, all the time.
 9 Q Do you know what the relationship was like
 10 between Howard and Larry?
 11 MR. MAYNARD: When? Can you clarify the
 12 question?
 13 Q If it was a dynamic relationship we can
 14 sort of pinpoint it but if during the entire time
 15 that you have known both of them, if there was just
 16 one dynamic -- I would say from entire time that you
 17 knew them.
 18 A I'm not sure I understand your question.
 19 Q Did you ever see Howard and Larry interact?
 20 A Yeah.
 21 Q Describe that interaction, in what context?
 22 A Howard would tell him what to do and then
 23 Larry would do it or go get something and come back
 24 or whatever.
 25 Q Do you think it was a friendly

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Exhibit 8

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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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HOWARD K. STERN,

Plaintiff,

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RITA COSBY and HACHETTE BOOK
GROUP USA, INC. d/b/a Grand Central
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DEPOSITION OF PATRIK SIMPSON
Los Angeles, California
Tuesday, May 27, 2008
CONFIDENTIAL

Reported by:
SUSAN A. SULLIVAN, CSR #3522, RPR, CRR
JOB NO. 16537

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1 PATRIK SIMPSON - CONFIDENTIAL
 2 **Q And what was the substance of Virgie's**
 3 **interview on Nancy Grace?**
 4 A That Howard and Anna killed Daniel.
 5 **Q And did you watch that interview with Anna?**
 6 A Yes.
 7 **Q And what was Anna's reaction to that video**
 8 **or that interview with Virgie on Nancy Grace?**
 9 A She was cussing at her mother on T.V. and
 10 saying Howard is not a murderer and she hated her
 11 mother. It was very apparent.
 12 **Q So based on your conversations with Anna,**
 13 **Anna didn't believe that Howard had a role in**
 14 **Daniel's death, correct?**
 15 A We never really discussed it but she said
 16 that to the T.V. and she also said that in the
 17 morning of the funeral so I don't know, it was
 18 never -- we never sat down and had a conversation and
 19 said that, but I don't think she felt he killed
 20 Daniel.
 21 **Q What did she say to the T.V. again, I'm**
 22 **sorry?**
 23 A She was cussing at the T.V. She was pissed
 24 off because she had called and left a message and I
 25 think Virgie played the -- said that she was on drugs
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1 PATRIK SIMPSON - CONFIDENTIAL
 2 or something when she left the message and she was
 3 angry that Virgie, she reached out to her mom and
 4 that Virgie basically went on T.V. and said things
 5 about her and Howard.
 6 **Q Was anybody else present for these**
 7 **conversations you had with Anna where Anna recounted**
 8 **her childhood abuse?**
 9 A Pol.
 10 **Q Pol was there too?**
 11 A Khris. A couple times we talk to Khris.
 12 **Q Anyone else?**
 13 A No.
 14 **Q Pol, Khris?**
 15 A No.
 16 **Q So they would have heard the same things**
 17 **that you heard?**
 18 A Yeah.
 19 **Q Any conversations that you had with Anna**
 20 **about her childhood abuse where it was just the two**
 21 **of you?**
 22 A Yes.
 23 **Q The substance of those conversations where**
 24 **it was just the two of you and where it was either**
 25 **you or Pol or you, Pol and Khris or any combination**
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1 PATRIK SIMPSON - CONFIDENTIAL
 2 **of the three of you, the substances of those was**
 3 **always the same, right?**
 4 A Yes.
 5 **Q I just want to get the timeline of this**
 6 **correct. Wilma ViceDomine called you sometime in**
 7 **October, late October, early November of 2007.**
 8 A Yes.
 9 **Q Left you a message.**
 10 A Yes.
 11 **Q You called her back.**
 12 A Yes.
 13 **Q You discussed, you had a conversation with**
 14 **her that lasted a few minutes where she had asked you**
 15 **some questions about Birkhead's paternity, his**
 16 **fitfulness as a father.**
 17 A Yes.
 18 **Q Anything else she talked to you about in**
 19 **that brief conversation?**
 20 A I don't recall.
 21 **Q She said that she could help you get a book**
 22 **published?**
 23 A Yes, yeah.
 24 **Q Did she tell you how she would help you get**
 25 **a book published?**
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1 PATRIK SIMPSON - CONFIDENTIAL
 2 A I said, "I'm not doing a book."
 3 **Q And then you said you needed to discuss the**
 4 **matters further with your husband?**
 5 A Because she wanted to meet us or talk to us
 6 further and I said, "I have to talk to Pol and I will
 7 call you back."
 8 **Q You called her back?**
 9 A I did.
 10 **Q What did you tell her when you called her**
 11 **back?**
 12 A Just left my number for her to call us
 13 back.
 14 **Q You never heard from her again?**
 15 A No.
 16 **Q Did you ever hear from anybody by the name**
 17 **of Don Clark?**
 18 A No.
 19 MR. MAYNARD: Sorry to interrupt, I don't
 20 want to make too big of a deal out of it, but I
 21 don't know how long you want to take discovery
 22 on our time. If you think it has bearings on
 23 our lawsuit I want to hear it and I don't want
 24 to obstruct you unnecessarily, but I don't want
 25 to sit here for a deposition that strikes me is
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1 **PATRIK SIMPSON - CONFIDENTIAL**
 2 A Yeah. It was Larry King or one of the
 3 shows she was on. I think it was Larry King.
 4 **Q What was Jackie talking about on T.V.?**
 5 A I don't know because the volume was muted.
 6 **Q What did Anna say about Jackie Hatten being**
 7 **on T.V.?**
 8 A She wasn't happy about it.
 9 **Q Why wasn't she happy?**
 10 A Again, that she didn't know her and she
 11 wasn't around so why was she going on T.V. talking
 12 about her.
 13 **Q Do you know whether -- well, was Jackie on**
 14 **T.V. talking about Anna and Daniel?**
 15 MS. McNAMARA: Objection.
 16 MS. KEUSSEYAN: The testimony was that the
 17 volume was muted.
 18 A Yeah. I mean, I don't know what they were
 19 saying. It wasn't closed captioned where you could
 20 see the words.
 21 **Q Other than this appearance at Horizons and**
 22 **the time when Anna saw Jackie Hatten on T.V., did you**
 23 **have any other conversations with Anna about Jackie**
 24 **Hatten?**
 25 A No.

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1 **PATRIK SIMPSON - CONFIDENTIAL**
 2 **Q Did you ever go to Anna's Studio City**
 3 **house?**
 4 A Yeah. Yes.
 5 **Q Tell me a little bit about the layout of**
 6 **that house. How many floors was it?**
 7 A Three floors.
 8 **Q Three floors.**
 9 **Where were the bedrooms in this house?**
 10 A The upstairs and Daniel's bedroom was the
 11 very bottom floor. I guess you would consider not
 12 really a basement but it was like a tri-level. So
 13 you walk in and then there's a floor that goes up and
 14 a floor that goes down and the floor, that was the
 15 floor where Daniel's room was and then Anna was
 16 upstairs.
 17 **Q How many times had you been in the Studio**
 18 **City house?**
 19 A Many. I don't know. Many times.
 20 **Q Can you give me a ballpark?**
 21 **(Witness and counsel conferring)**
 22 A I don't know. Many times.
 23 **Q So Daniel's bedroom in the Studio City**
 24 **house is on the first floor of the house and where is**
 25 **Anna's bedroom?**

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1 **PATRIK SIMPSON - CONFIDENTIAL**
 2 A I guess it would be the top floor.
 3 **Q Okay. So there's a floor -- there's**
 4 **Daniel's bedroom on the first floor, there's a second**
 5 **floor, and then Anna's bedroom is on the third floor;**
 6 **is that right?**
 7 A No, no, that's not what I said.
 8 MS. KEUSSEYAN: I'm going to interject
 9 right here unless the layout of the Studio City
 10 house is at issue in Blonde Ambition.
 11 MR. MAYNARD: It is. It is relevant.
 12 MS. KEUSSEYAN: Because we have not read
 13 the book. One minute. We need to get an idea
 14 of what's at issue and what's not here.
 15 MR. MAYNARD: This is appropriate.
 16 MS. KEUSSEYAN: All right. Then let's
 17 proceed.
 18 A I haven't read it so I don't know.
 19 MR. PATTON: I will get you a copy.
 20 MS. KEUSSEYAN: I'm sorry?
 21 MR. PATTON: I will get you a copy for
 22 tomorrow.
 23 MS. KEUSSEYAN: Can we just read back the
 24 last question because I don't know what he said.
 25 A I think I misunderstood.

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1 **PATRIK SIMPSON - CONFIDENTIAL**
 2 **Q I'm trying to get the layout of the house,**
 3 **where the bedrooms are with respect to each other.**
 4 A Okay.
 5 **Q Daniel's bedroom is on the first floor of**
 6 **the house, correct?**
 7 A No. When you drive up to the house, the
 8 house is kind of like this, I guess. You drive up
 9 and in this floor you walk in and there's the living
 10 room, there's like should be dining room area, all of
 11 that. You can then go around and go down stairs
 12 which maybe they would call like a basement area,
 13 whatever. That's where Daniel's room was. So I
 14 wouldn't say that's the first floor, that would be
 15 the bottom below floor, I guess, I don't know. And
 16 then you walk around the other way and you go up the
 17 stairs and there's Anna's bedroom and the middle
 18 floor is like the kitchen, living room, all of that,
 19 so it is a tri-level.
 20 **Q So there's a floor separating Anna's**
 21 **bedroom from Daniel's bedroom.**
 22 A Yes.
 23 **Q And could you see Anna's bedroom, the**
 24 **entrance to Anna's bedroom from Daniel's bedroom?**
 25 A No.

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1 PATRIK SIMPSON - CONFIDENTIAL
 2 **Q Why is that?**
 3 A Because the way the house is, the way the
 4 floor is laid out you have to come up and go around
 5 and go around the stairs and go all the way around.
 6 Pol was always saying, "Who is the idiot that built
 7 this house" because it is so crazy.
 8 **Q Could you even see the main entrance to the**
 9 **house from Daniel's bedroom? If you were in Daniel's**
 10 **bedroom could you see the front door to the house?**
 11 A No.
 12 **Q Could you see any entrance to the house**
 13 **from inside Daniel's bedroom?**
 14 A No.
 15 **Q So if you were in Daniel's bedroom in the**
 16 **Studio City house would you be able to see anyone**
 17 **entering or exiting an entrance on the house?**
 18 MS. McNAMARA: Objection.
 19 A No, no.
 20 **Q And from Daniel's bedroom would you be able**
 21 **to see anyone entering or exiting Anna's bedroom?**
 22 MS. McNAMARA: Objection.
 23 A No, because the whole floor between the
 24 two, no.
 25 **Q Do you know when Anna first met Ben**
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1 PATRIK SIMPSON - CONFIDENTIAL
 2 **Thompson?**
 3 A 2005, I believe.
 4 **Q Do you know where, when, where they met?**
 5 A I thought it was South Carolina but I could
 6 be wrong. I don't know.
 7 **Q Do you know the circumstances surrounding**
 8 **the first time they met?**
 9 A No.
 10 **Q How would you describe the relationship**
 11 **between Anna and Ben Thompson?**
 12 A I don't understand what you mean by the
 13 relationship.
 14 **Q Was it a friendship, was it sexual, was it**
 15 **business partners?**
 16 A I saw them kiss, I saw them -- I don't
 17 know. I don't know if it was sexual, I don't know if
 18 it was just friendship, I don't know if it was a
 19 relationship. I saw them intimately together.
 20 **Q Do you know whether the -- how would you**
 21 **describe -- was it a friendly relationship?**
 22 A Yes.
 23 **Q Did that relationship change at any point?**
 24 A Yes.
 25 **Q When was that?**
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1 PATRIK SIMPSON - CONFIDENTIAL
 2 A I believe after Daniel died and then when
 3 he left The Bahamas to come back.
 4 **Q When who left The Bahamas?**
 5 A Ben.
 6 **Q Do you know why that relationship changed**
 7 **after Daniel died?**
 8 A No.
 9 **Q Do you know the relationship between Anna**
 10 **and Ford Shelley?**
 11 A I understood Ford Shelley was the son of
 12 Ben, I believe, is what I understood.
 13 **Q When was the first time that you met Ben**
 14 **Thompson?**
 15 A In The Bahamas.
 16 **Q After Daniel died or before Daniel died?**
 17 A After.
 18 **Q When was the first time that you met Ford**
 19 **Shelley?**
 20 A In The Bahamas.
 21 **Q Again, after Daniel died?**
 22 A Yes.
 23 **Q Do you know what Anna's feelings toward**
 24 **Ford Shelley were?**
 25 A I'm sorry, I didn't hear the question, I
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1 PATRIK SIMPSON - CONFIDENTIAL
 2 was coughing. Sorry.
 3 **Q Do you know what Anna's feelings were**
 4 **toward Ford Shelley?**
 5 A She didn't like him.
 6 **Q Why didn't she like him?**
 7 A She said he was a snake.
 8 **Q A snake?**
 9 A She said he was a snake.
 10 **Q Do you know why she felt he was a snake?**
 11 A No.
 12 **Q Do you know anything about the relationship**
 13 **between Anna and Ford?**
 14 A No.
 15 **Q But you knew there was a time after, after**
 16 **Daniel's or rather Anna's death when Ford Shelley**
 17 **went to Horizons, correct?**
 18 A Yes.
 19 **Q And tell me about that.**
 20 A I wasn't there, Pol was there.
 21 **Q What did Pol tell you about that?**
 22 A That they went there and took everything
 23 out of the house.
 24 **Q Who went there?**
 25 A Ford and his wife and their wives and Ben,
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1 **PATRIK SIMPSON - CONFIDENTIAL**
2 **statements made by you in the interview?**
3 A I believe so, yeah.
4 **Q Do you see the statement that I was**
5 **referring to earlier:**
6 **"Simpson: This picture of her being drug-**
7 **addicted, I never saw it."**
8 MS. KEUSSEYAN: What page is this on?
9 MR. LANTTA: That is Page 15, about halfway
10 down the page.
11 A Okay. Yes. I think that's the clown
12 video, maybe. I can't remember what it was. I think
13 it was the clown video.
14 **Q So are you referring there, are you**
15 **referring to the clown video or are you talking about**
16 **generally about never seeing her drug-addicted?**
17 A To the clown video. I think they showed
18 the clown video on that.
19 **Q Do you remember recently giving an**
20 **interview with Greta Van Susteren in which you talked**
21 **about your book, Portrait of an Icon, and also**
22 **touched about Anna's use of medications?**
23 A I remember the interview but I don't
24 remember exactly.
25 MR. LANTTA: Let me mark this too. Maybe
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1 **PATRIK SIMPSON - CONFIDENTIAL**
2 it will help move things along.
3 THE WITNESS: Okay.
4 MR. LANTTA: Go ahead and mark this as
5 Simpson 2.
6 (Simpson Exhibit 2, a document, marked for
7 identification, as of this date.)
8 **Q If you want to jump ahead to Page 3 where**
9 **the interview starts on here --**
10 A Okay. All right.
11 **Q -- does this transcript accurately reflect**
12 **the statements you made in that interview with Ms.**
13 **Van Susteren?**
14 A Yes.
15 **Q Do you see where you are quoted as saying**
16 **that -- Greta first says, "Her life was not**
17 **exactly -- in the six or seven months prior to the**
18 **baby being born, not exactly a fairy tale."**
19 MS. McNAMARA: "Fairy book."
20 MR. LANTTA: Thank you.
21 "That wasn't around us. I think it was
22 really, really overexaggerated in the media."
23 **Q What did you mean when you were saying**
24 **that? What did you mean when you said it was really,**
25 **really overexaggerated in the media?**
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1 **PATRIK SIMPSON - CONFIDENTIAL**
2 A I believe it was the clown video. I can't
3 recall. But it was the clown video I was talking
4 about.
5 **Q So, again, we're talking about Anna's drug**
6 **usage here?**
7 MR. MAYNARD: Objection.
8 A I think it was specifically the clown
9 video, actually.
10 **Q Well, you go on and you state further along**
11 **in this interview that "Greta, we were in the house**
12 **every day in The Bahamas, and that wasn't the life**
13 **that we shared with Anna."**
14 **What isn't the life that you shared with**
15 **Anna, a life of drug impairment?**
16 A Well --
17 MS. KEUSSEYAN: I'm sorry, where are you
18 at?
19 **Q Three paragraphs down from where we left**
20 **off, still on Page 3.**
21 A Okay.
22 MS. KEUSSEYAN: And the question is?
23 A Yes.
24 **Q What you are referring to, that wasn't the**
25 **life that you shared with Anna, and I asked whether**
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1 **PATRIK SIMPSON - CONFIDENTIAL**
2 **you were referring to --**
3 A Just because somebody does something
4 doesn't mean that you are sharing that in their life.
5 I have friends that do things all the time that I
6 don't necessarily agree with. I'm there, I'm around
7 it, but it doesn't mean I'm sharing it with them.
8 **Q You go on to say, "She wasn't impaired."**
9 A I was referring to the clown video. She
10 wasn't impaired.
11 **Q You don't feel she was impaired on the**
12 **clown video; is that right?**
13 A I still to this day have never seen the
14 whole clown video so I can't say that. The portion
15 of it I saw, I saw Anna play baby with Shelby all the
16 time, she would play and she would have her baby
17 voice and that's what I saw.
18 **Q Where did you see the clown video?**
19 A I think she showed it. I can't remember.
20 MS. KEUSSEYAN: I believe there was
21 testimony as to the first time that you saw it;
22 it was on one of the T.V. shows.
23 A Yeah. I can't remember which one.
24 **Q Did you ever witness Anna using any illegal**
25 **drugs?**
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