

# Exhibit 11

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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

HOWARD K. STERN,                   §  
  §  
                          Plaintiff,   §  
  §  
VS.                                   § 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.   §

\*\*\*\*\*  
CONFIDENTIAL ORAL AND VIDEOTAPED DEPOSITION OF  
WILMA VICEDOMINE  
OCTOBER 13, 2008  
\*\*\*\*\*

ORAL DEPOSITION OF WILMA VICEDOMINE, produced as a  
witness at the instance of the DEFENDANT, and duly  
sworn, was taken in the above-styled and numbered  
cause on the 13th of October, 2008, from 9:20 a.m. to  
7:15 p.m., before Linda A. Rayburn, CSR, RPR, CLR in and  
for the State of Texas, reported by machine shorthand,  
at the offices of The O'Quinn Law Firm, 2300 Lyric  
Centre Building, 440 Louisiana, Houston, Texas, pursuant  
to the Federal Rules of Civil Procedure and any  
provisions stated on the record or attached hereto.

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1 WILMA VICEDOMINE  
 2 on phone that they had a huge amount of evidence. And,  
 3 you know, so she was going to show us some of this  
 4 evidence. And when we got there, there was just  
 5 nothing.  
 6 **Q And so after -- after that, after you said,**  
 7 **"What information do they have," then what occurred, if**  
 8 **anything?**  
 9 A Liz Thompson said that I could ask a pretty  
 10 generic question. Which I did. I asked them, "Well, if  
 11 Anna wasn't doped up, you know, what did she do?"  
 12 You know, and they said that she liked to  
 13 lie in bed and watch TV, you know, and watch movies."  
 14 And I said, "Well, what did she like to  
 15 watch?"  
 16 And they said -- they mentioned some show,  
 17 I don't know what it was. They mentioned that she liked  
 18 to watch movies.  
 19 I asked them what kind of movies, whether  
 20 it's home movies or Blockbuster movies.  
 21 They asked me -- well, they didn't know  
 22 what Blockbuster movie thing was, so I had to explain  
 23 it's when you go to the store and you pay for the movie  
 24 versus a home movie is something that you made yourself.  
 25 They started giggling and telling me that,  
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1 WILMA VICEDOMINE  
 2 no, she liked to watch a particular movie of Mr. Stern  
 3 and Mr. Birkhead doing that thing.  
 4 **Q And did you say anything or ask any further**  
 5 **question after that comment?**  
 6 A I asked, "What do you mean 'that thing'?"  
 7 You know, so they started giggling even  
 8 more. And then they said, "You know, two men doing that  
 9 thing."  
 10 And I'm like, "You mean like gay people?"  
 11 And they said, "Yeah, that thing."  
 12 And I'm like, "Oh, let it go. I've had  
 13 enough."  
 14 **Q When you say "they," were both of the nannies**  
 15 **speaking at the same time relaying this information or**  
 16 **was one of them speaking and the other confirming? What**  
 17 **was the situation?**  
 18 MR. WOOD: Objection to the form of the --  
 19 A One --  
 20 MR. WOOD: Excuse me. Objection to the  
 21 form of the question as compound, multiple.  
 22 A Both of them confirmed that there was this  
 23 video that they watched. Both of them was constantly  
 24 saying, "Yes." You know, one will say something and  
 25 then the other one will back it up and that way around.  
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1 WILMA VICEDOMINE  
 2 That's how it went.  
 3 **Q (BY MS. MCNAMARA) Did you learn from them any**  
 4 **more details about what was on the video?**  
 5 A Heck no. I don't want anything to know about  
 6 the rest of that.  
 7 **Q Did you learn any information as to when Anna**  
 8 **Nicole was watching this video?**  
 9 A She happened to do it several times, according  
 10 to them.  
 11 **Q Now, if I understand your testimony, I don't --**  
 12 **did you -- what was your impression of Elizabeth**  
 13 **Thompson?**  
 14 A I absolutely did not care for her.  
 15 **Q And why did you not care for her?**  
 16 A She was really interestingly pleasant on the  
 17 phone with me when we originally started talking, you  
 18 know, very, very kind and sweet and want us to come  
 19 there, you know, because they have all of this  
 20 information.  
 21 The minute she walked in the conference  
 22 room, it's like she was just cold and ugly, you know,  
 23 towards me. It was clear she couldn't care less if I  
 24 was -- I might as well not even been there. She just  
 25 focused on Mr. Don Clark, you know, and she was  
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1 WILMA VICEDOMINE  
 2 obviously only there about money, nothing else. She  
 3 couldn't care less about the nannies. That was my  
 4 impression.  
 5 **Q And what was your impression of the nannies?**  
 6 A I found them to be really credible.  
 7 **Q Did you find their statements concerning the**  
 8 **videotape to be credible?**  
 9 MR. WOOD: Objection to the form of --  
 10 A I did at the time.  
 11 MR. WOOD: Excuse me, Ms. Vicedomine.  
 12 You're going to have to let me object. I know your  
 13 anxious to get these answers out. Y'all have talked  
 14 about it before.  
 15 MR. MCFALL: When he starts to object,  
 16 you've got to let him make his objection.  
 17 THE WITNESS: Sure.  
 18 MR. WOOD: Let me object to the form of  
 19 the question as leading and suggestive of an answer.  
 20 **Q (BY MS. MCNAMARA) Do you recall the question?**  
 21 **I think the question was did you find their statements**  
 22 **concerning the videotape to be credible?**  
 23 MR. WOOD: Objection to the form of the  
 24 question as leading and suggestive of an answer.  
 25 **Q (BY MS. MCNAMARA) You can answer it.**  
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1 WILMA VICEDOMINE  
 2 A Yes.  
 3 **Q Did you find them to be truthful?**  
 4 A Yes.  
 5 MR. WOOD: Same objection, leading and  
 6 suggestive of an answer.  
 7 **Q (BY MS. MCNAMRA) Did you at any point in time**  
 8 **become aware that the nannies had signed affidavits?**  
 9 A Yes.  
 10 **Q Did -- did -- do you know whether they signed**  
 11 **more than one affidavit?**  
 12 A Yes.  
 13 **Q Tell me what you know about their affidavits.**  
 14 A There were original set of affidavits, it was  
 15 pretty well publicized, because they were supposedly  
 16 paid for those affidavits. They made claims that those  
 17 affidavits had been changed from what they originally  
 18 said. They were pretty upset about that.  
 19 That was one of the questions I asked them  
 20 in the meeting, to explain to me this whole controversy  
 21 about a paid affidavit. That's when I discovered they  
 22 were just paid \$50 each, you know, for their time.  
 23 They explained that Tracy Ferguson, the  
 24 lawyer that did the affidavit, gave them the hundred  
 25 dollars and they were shocked what it was for. And they  
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1 WILMA VICEDOMINE  
 2 said -- the lawyer apparently told them that she had to  
 3 do that. So they just took it. They lived clear the  
 4 other side of the island. And that was it.  
 5 **Q And this was in your meeting in the Bahamas**  
 6 **they explained about the payment on the affidavits?**  
 7 A Yes.  
 8 MR. WOOD: Objection to the form of the  
 9 question as leading.  
 10 **Q (BY MS. MCNAMRA) Did they -- did you have any**  
 11 **dialog with them concerning the content of those**  
 12 **affidavits and whether they were changed?**  
 13 A Not really.  
 14 **Q Did you question them about any changes in the**  
 15 **affidavits?**  
 16 A No, not really.  
 17 **Q Were you aware that these affidavits were**  
 18 **subsequently changed by the nannies?**  
 19 MR. WOOD: Objection to the --  
 20 A Yes.  
 21 MR. WOOD: -- form of the question as  
 22 leading and suggestive of an answer.  
 23 **Q (BY MS. MCNAMRA) What do you know about that?**  
 24 A They explained that they went back and -- to  
 25 this lawyer and they had redone the affidavits.  
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1 WILMA VICEDOMINE  
 2 **Q And do you know what information was redone or**  
 3 **changed?**  
 4 A I believe there was some issue surrounding  
 5 Shane Gibson that was in there, you know. I know that  
 6 there was significantly more information in the second  
 7 affidavit than what was in the original.  
 8 **Q Okay. And what content or what do you recall**  
 9 **the content from the second affidavit that the nannies**  
 10 **gave?**  
 11 A They talked about the drugs in the house, they  
 12 talked about, you know, underfeeding the baby. It's  
 13 just a lot -- a lot of information.  
 14 **Q Do you recall anything else?**  
 15 A They talked about the checks that was signed by  
 16 Mr. Stern and Dr. Erosovich. They talked -- you know  
 17 what, right this second it's --  
 18 **Q I'm just asking whatever you recall, that's**  
 19 **all.**  
 20 MR. WOOD: Let her finish, if you don't  
 21 mind, Ms. McNamara.  
 22 MS. MCNAMARA: No, absolutely.  
 23 MR. WOOD: What were you going to say,  
 24 Ms. Vicedomine, right this second what?  
 25 A It's just I can't think of all of it.  
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1 WILMA VICEDOMINE  
 2 **Q (BY MS. MCNAMRA) Were you also aware that the**  
 3 **nannies had given certain interviews to a place called**  
 4 **Controversy TV?**  
 5 A Yes.  
 6 **Q Do you know Controversy TV?**  
 7 A I do now.  
 8 **Q Did you watch any of those interviews given by**  
 9 **the nannies on Controversy TV?**  
 10 A I did.  
 11 **Q What do you recall about those interviews?**  
 12 A They talked about the Shane Gibson situation,  
 13 about him coming to the house, about their immigration  
 14 status in the Bahamas. They talked about the baby, you  
 15 know, taking care of the baby. They talk about the drug  
 16 use, that Anna was constantly being fed drugs. They  
 17 talked the fact that she slept days on end. They talked  
 18 about Anna screaming at Mr. Stern that he needed to get  
 19 out of there.  
 20 I don't know, it's long video. It's three  
 21 long sessions.  
 22 **Q When you say that they talked about Shane**  
 23 **Gibson, what do you recall that they said about Shane**  
 24 **Gibson?**  
 25 A That he came to the house quite often and he  
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1 WILMA VICEDOMINE

2 A Yes.

3 Q Did you understand she was investigating the  
4 Anna Nicole Smith story for some journalistic purpose?

5 A Something. I didn't know what.

6 Q Did you know she was writing a book?

7 A Absolutely not.

8 Q What was your impression of Ms. Cosby as a  
9 journalist, from dealing with her?

10 A I liked her. She was pretty thorough. She  
11 constantly asked same questions over and over again.  
12 You know, she called back quite frequently to reconfirm  
13 things. I thought she was pretty good.

14 Q Did you have a sense that she was trying to get  
15 as much detail as she could about the information she  
16 was asking you?

17 A Yes.

18 MR. WOOD: Objection to the form --  
19 Ms. Vicedomine, just give me a second. Objection to the  
20 form of the question as leading.

21 A Yes.

22 Q (BY MS. MCNAMRA) Did you have a sense as to  
23 whether she was trying to be accurate?

24 A Yes.

25 Q What was your sense?

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1 WILMA VICEDOMINE

2 A The fact that she kept calling back, going back  
3 over the same things that I told her, so I thought that  
4 she's definitely doing -- whatever she's doing, you  
5 know, she's doing it right.

6 Q Did you -- did she ever call you back and try  
7 to verify quotes or information, specific information  
8 you had given to her?

9 A Yes.

10 MR. WOOD: Objection to the form of the  
11 question as leading.

12 Q (BY MS. MCNAMRA) Did she do that on --

13 MR. WOOD: Y'all need to slow down just a  
14 little bit on this dog-and-pony here. I need to get my  
15 objections on the record, if you don't mind.

16 Q (BY MS. MCNAMRA) Did she do that on more than  
17 one occasion?

18 A Yes.

19 Q Now, when "Blonde Ambition" was published, did  
20 you read the book?

21 A Yes.

22 Q Did you understand in a number of places there  
23 is information attributed to either investigators or  
24 case investigators or investigators to an interested  
25 party, did you understand those attributions to be

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1 WILMA VICEDOMINE  
2 referring to you or Mr. Clark?

3 A Yes.

4 MR. WOOD: Objection to the form of the  
5 question. And also, it fails to identify what  
6 statements you're referring to. I think the testimony  
7 establishes that "other investigators" were referred to  
8 as investigators in the book also.

9 Q (BY MS. MCNAMRA) Did you understand -- did you  
10 have any understanding with Ms. Cosby as to whether she  
11 could identify you as a source at the time you were  
12 speaking with her?

13 A Say that again.

14 Q Did you have any understanding with Ms. Cosby  
15 as to whether she could identify you as a source of  
16 information when you were speaking with her?

17 A No.

18 Q You didn't have any understanding --

19 MR. WOOD: She's answered --

20 A No.

21 MR. WOOD: -- the question.

22 Q (BY MS. MCNAMRA) Did -- if -- did you have any  
23 understanding with her that if a lawsuit occurred as a  
24 result of the information that you gave her, as to  
25 whether you would stand behind your information?

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1 WILMA VICEDOMINE

2 A Yes.

3 Q And what was that -- tell me what you recall  
4 about that understanding or communication with  
5 Ms. Cosby.

6 A To the -- I recall she brought up the issue if,  
7 you know, it ever had to be validated or verified, would  
8 I back it up. And I said, "Absolutely."

9 Q I'd like to direct your attention to -- if I  
10 can have a copy of "Blonde Ambition" given to you. And  
11 I'm going to direct your attention to certain pages of  
12 the book. And first I'd like you to look at Page 2 of  
13 the book.

14 MS. MCNAMARA: And I assume, Lin, you have  
15 a copy of the book that you can look at?

16 MR. WOOD: Let me take a moment to get it,  
17 if you don't mind.

18 MR. MCFALL: May I look at this one?

19 MS. MCNAMARA: Yes.

20 MR. WOOD: All right. I have it. Thank  
21 you.

22 Q (BY MS. MCNAMRA) Okay. I'm first going to  
23 direct your attention to Page 2 of the book under the  
24 heading, "Three days earlier, Monday, February 5th."  
25 I'd like you to read the first two sentences of that

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1 WILMA VICEDOMINE  
 2 information to Ms. Cosby, did you believe it to be  
 3 honest and accurate?  
 4 A Yes.  
 5 Q Now, on Page 199, in the second full paragraph,  
 6 the first sentence reads, "Mark Speer told me he loaned  
 7 Larry his cell phone during this time period, resulting  
 8 in two phone bills totaling \$3,100, which normally  
 9 averaged \$150 a month in usage."  
 10 Did you receive such information from  
 11 Mr. Speer in the course of your conversations with him?  
 12 A Yes.  
 13 Q And at the time you received that information,  
 14 did you believe it to be accurate?  
 15 A Yes.  
 16 Q And did you communicate that information to  
 17 Ms. Cosby in the course of your conversations with her?  
 18 A I might have.  
 19 Q You don't specifically recall communicating  
 20 that?  
 21 A No.  
 22 Q But if you had communicated it, you would have  
 23 believed it to be accurate; is that right?  
 24 A Yes.  
 25 MS. MCNAMRA: Why don't we take a  
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1 WILMA VICEDOMINE  
 2 five-minute break. I may be almost done.  
 3 THE VIDEOGRAPHER: We're going off the  
 4 record. The time is 11:27.  
 5 (A recess was taken.)  
 6 THE VIDEOGRAPHER: We're back on the  
 7 record. The time is 11:53.  
 8 MS. MCNAMRA: I can state for the record  
 9 that I have completed my examination of Ms. Vicedomine  
 10 for now and reserve the right to ask some questions  
 11 later, following Mr. Woods' examination, if necessary.  
 12 MR. WOOD: All right. Good. Anything  
 13 else?  
 14 EXAMINATION  
 15 BY MR. WOOD:  
 16 Q Ms. Vicedomine, you understand I represent  
 17 Mr. Stern?  
 18 A Yes.  
 19 Q You indicated that you were employed by The  
 20 O'Quinn Law Firm in early February of 2007; is that  
 21 right?  
 22 A No.  
 23 MS. MCNAMRA: Objection, mischaracterizes  
 24 her testimony.  
 25 A No.  
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1 WILMA VICEDOMINE  
 2 Q (BY MR. WOOD) When did you become employed by  
 3 the law firm of John --  
 4 A I'm not employed by the law firm.  
 5 Q Have you ever been employed by the law firm?  
 6 A No.  
 7 Q So you've never been an employee of the John  
 8 O'Quinn law firm?  
 9 A No.  
 10 Q Have you ever been an employee of Don Clark?  
 11 A No.  
 12 Q So all of your actions with respect to the  
 13 investigation into the matters that you discussed with  
 14 Ms. McNamara have been undertakings on your own?  
 15 A Yes.  
 16 Q When did you first start working with John  
 17 Clark?  
 18 A In -- on this case?  
 19 Q Yes.  
 20 A February '07.  
 21 Q Was that early February of '07?  
 22 A No.  
 23 Q When exactly in February did you begin to work  
 24 with Mr. Clark?  
 25 A In the custody hearing in Florida.  
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1 WILMA VICEDOMINE  
 2 Q What date?  
 3 A I guess around the 16th, around there.  
 4 Q Well, what is your best recollection as to the  
 5 date when you first undertook your own investigation  
 6 efforts in conjunction with Mr. Clark?  
 7 A I'll say the 16th.  
 8 Q February 16th of 2007?  
 9 A Yes.  
 10 Q And you were at all times acting independent of  
 11 Mr. Clark and The O'Quinn Law Firm --  
 12 A Yes.  
 13 Q -- is that true?  
 14 A Yes.  
 15 Q And that would have been true from February  
 16 16th of 2007, through today --  
 17 A True.  
 18 Q -- right?  
 19 A Yes.  
 20 Q You have never been an agent or employee of The  
 21 O'Quinn Law Firm, true?  
 22 A No, I have not.  
 23 Q And while -- I assume that your involvement was  
 24 such that it was what you wanted to do and not what you  
 25 were told to do; is that right?  
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1 WILMA VICEDOMINE  
 2 A Yes.  
 3 Q Who did you understand Paul Porter to be?  
 4 A Agent for Moe.  
 5 Q Did you do any background research on  
 6 Mr. Porter?  
 7 A A little bit.  
 8 Q When?  
 9 A Months later.  
 10 Q "Months later" meaning when?  
 11 A In June --  
 12 Q June of two thousand --  
 13 A -- July '07.  
 14 Q '07?  
 15 A Yes.  
 16 Q Okay. And this -- now, this is when you went  
 17 down to Florida, then, on the second trip and you had  
 18 this interview that you describe to Ms. McNamara where  
 19 you and Don Clark were there, Moe and Tas were there.  
 20 After about an hour Moe left, Don went out and spoke  
 21 with him, you stayed in for another couple hours talking  
 22 to Tas --  
 23 A Yes.  
 24 Q -- is that right?  
 25 A And you said you had been involved in I

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1 WILMA VICEDOMINE  
 2 think four or five other investigations with Mr. Clark?  
 3 A Yes.  
 4 Q For the O'Quinn firm or in the same scenario as  
 5 what you did with the Anna Nicole Smith case, where you  
 6 were just involved on your own helping him investigate?  
 7 A The same scenario.  
 8 Q Okay. Not paid?  
 9 A No.  
 10 Q Not an employee?  
 11 A No.  
 12 Q And not under their control?  
 13 A No.  
 14 Q Not an agent?  
 15 A No.  
 16 Q Now, I guess we could describe you -- and I  
 17 don't mean this in anything other than trying to be  
 18 accurate. Would you describe yourself as an amateur  
 19 investigator?  
 20 A Yes.  
 21 Q And have you tried to develop, Ms. Vicedomine,  
 22 a methodology for your investigative work?  
 23 A Yes.  
 24 Q And does that investigative methodology include  
 25 that when you interview witnesses such as Moe and Tas,

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1 WILMA VICEDOMINE  
 2 you take notes?  
 3 A Yes.  
 4 Q And I would take it that you take meticulous  
 5 notes?  
 6 A I'd like to think so. I don't feel like I'm  
 7 always that great.  
 8 Q But when --  
 9 THE COURT REPORTER: I don't feel like...  
 10 THE WITNESS: ... I'm always that great.  
 11 Q (BY MR. WOOD) But you clearly took notes from  
 12 the interview conducted in April of 2007 with Moe and  
 13 Tas?  
 14 A I did.  
 15 Q Where are those notes?  
 16 A Mr. -- Don -- it's here somewhere.  
 17 Q Well, they're your notes, aren't they?  
 18 A Uh-huh.  
 19 Q Is your answer yes?  
 20 A Yes.  
 21 Q And you say "they're here somewhere"?  
 22 A I gave them to Don.  
 23 Q When?  
 24 A I gave them all my boxes of stuff months ago.  
 25 Q When?

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1 WILMA VICEDOMINE  
 2 A I don't know.  
 3 Q Well, you say "months ago." I need to try to  
 4 get your best recollection of when you gave Mr. Clark  
 5 your boxes.  
 6 A Well, I give Don Clark my research or my notes  
 7 or everything that I have, I just give it to him.  
 8 Sometimes I keep copies of my stuff and I had it in  
 9 boxes. And I just gave them all, because I didn't know  
 10 what they had and what they didn't have. So, go.  
 11 Q Well, if you gave them your research and your  
 12 notes, did you keep copies for yourself?  
 13 A Of certain things, I did, yes.  
 14 Q Did you keep a copy of the Moe and Tas notes?  
 15 A Yes.  
 16 Q And where are those?  
 17 A At my house.  
 18 Q Here in Houston?  
 19 A Yes.  
 20 Q What is your residence address?  
 21 A [REDACTED]  
 22 Q And how many pages of notes do you have with  
 23 respect to the April interview with Moe and Tas?  
 24 A Several. I don't know exactly the number.  
 25

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1 WILMA VICEDOMINE  
 2 just give it to him as it happens.  
 3 **Q How many murder investigations have you ever**  
 4 **been involved in as an amateur investigator?**  
 5 A This would be my first.  
 6 **Q This being the Anna Nicole Smith case?**  
 7 A Yes.  
 8 **Q And you are not a licensed private investigator**  
 9 **or a licensed investigator under the laws of the state**  
 10 **of Florida, were you?**  
 11 A No.  
 12 **Q And did you represent yourself when you**  
 13 **traveled to the Bahamas as going there on business as an**  
 14 **investigator?**  
 15 A No.  
 16 **Q Were you in any way licensed or authorized to**  
 17 **conduct any type of investigation -- private**  
 18 **investigation in the Bahamas?**  
 19 A No.  
 20 **Q On the second trip to Florida, where did you**  
 21 **go, Ft. Lauderdale?**  
 22 A Yes.  
 23 **Q And where did you stay?**  
 24 A The same hotel.  
 25 **Q Do you know the name of the hotel?**

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1 WILMA VICEDOMINE  
 2 A I don't recall it.  
 3 **Q Did you pay for your hotel room?**  
 4 A No.  
 5 **Q Mr. Clark paid for it?**  
 6 A Yes.  
 7 **Q So you didn't have to get reimbursed for that**  
 8 **room or for any of your meals?**  
 9 A Correct.  
 10 **Q Correct. All right. So tell me now, you said**  
 11 **that you also traveled to, was it the Bahamas?**  
 12 A Yes.  
 13 **Q And South Carolina?**  
 14 A Yes.  
 15 **Q Anyplace else?**  
 16 A No.  
 17 **Q All right. When did you first travel to South**  
 18 **Carolina?**  
 19 A I believe it was in October '07.  
 20 **Q October of '07?**  
 21 A Uh-huh.  
 22 **Q And who did you travel with to South Carolina?**  
 23 A Don Clark and Tom Pirtle.  
 24 **Q And what was the purpose of going to South**  
 25 **Carolina in October of '07?**

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1 WILMA VICEDOMINE  
 2 A To talk with Ford Shelley and G. Ben Thompson.  
 3 **Q Did you interview anyone at that time in South**  
 4 **Carolina other than Ford Shelley and Ben Thompson?**  
 5 A No.  
 6 **Q How many days were you in South Carolina?**  
 7 A We flew in that day and we flew out that day.  
 8 **Q Is that on Mr. O'Quinn's plane?**  
 9 A Yes.  
 10 **Q So you didn't have any expenses to be**  
 11 **reimbursed for that trip, true?**  
 12 A No, I did not.  
 13 **Q And how -- did you say -- do you recall when in**  
 14 **October?**  
 15 A I don't recall at all, no.  
 16 **Q If today is October the 13th, you think it was**  
 17 **the middle of the month? About a year ago?**  
 18 A Yeah, I don't recall at all what time it was.  
 19 It was a very quick arranged trip, so.  
 20 **Q How long did y'all meet there?**  
 21 A The entire day.  
 22 **Q Who all was present, other than -- if anyone,**  
 23 **other than Ben Thompson, Ford Shelley, Tom Pirtle, Don**  
 24 **Clark and you?**  
 25 A And Susan Brown, their lawyer.

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1 WILMA VICEDOMINE  
 2 **Q Susan Brown from Atlanta?**  
 3 A Yes.  
 4 **Q Or Peachtree City?**  
 5 A Yes.  
 6 **Q Tell me what y'all discussed in that meeting.**  
 7 MR. KLEIN: Excuse me. I'm going to --  
 8 Counsel, I'm going to insert a privilege on behalf of  
 9 the firm.  
 10 **Q (BY MR. WOOD) I'd like to know what y'all**  
 11 **discussed in that meeting.**  
 12 A I can't tell you.  
 13 MR. WOOD: Well, what privilege can you  
 14 assert? She doesn't work for your law firm. She's a  
 15 third party. So if you had a privilege, it's waived.  
 16 MR. KLEIN: We never maintained that she  
 17 worked for the law firm. We maintain that she did  
 18 investigation with the firm. She's clearly an  
 19 independent contractor, I don't care that she doesn't  
 20 work for the firm. An we've already had a ruling on  
 21 this --  
 22 MR. WOOD: No, you haven't either, because  
 23 the ruling -- I would -- I would challenge that your  
 24 ruling was based on what I believe now to be a  
 25 misrepresentation to the Court about her status.

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1 **WILMA VICEDOMINE**  
 2 **conversation?**  
 3 A No.  
 4 **Q And then I believe you told Ms. McNamara that**  
 5 **after that initial conversation, that prior to the**  
 6 **publication of the book, you had between 10 and 20**  
 7 **telephone conversations with Ms. Cosby?**  
 8 A After?  
 9 **Q Yes, ma'am.**  
 10 MS. MCNAMRA: After what?  
 11 MR. WOOD: After the initial telephone  
 12 conversation.  
 13 MS. MCNAMRA: And before the publication  
 14 of the book?  
 15 MR. WOOD: And before the publication of  
 16 the book.  
 17 A Yeah. Okay. Yeah.  
 18 **Q (BY MR. WOOD) Is that right?**  
 19 A Yes.  
 20 **Q And would you call her or would she call you?**  
 21 A Both -- I'll call her and she'll call me.  
 22 **Q What was the -- after you had the first call**  
 23 **with her, when did the next call take place?**  
 24 A I don't know. Few days later, I guess.  
 25 **Q Was it in the first call that you told her**

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1 **WILMA VICEDOMINE**  
 2 **about the nannies and Anna Nicole allegedly watching the**  
 3 **sex tape?**  
 4 A No.  
 5 **Q Why not?**  
 6 A I don't know, I didn't think it was important.  
 7 **Q Why did you not think it was important?**  
 8 A I didn't think that I had any information there  
 9 to talk about.  
 10 **Q What do you mean?**  
 11 A I said, they didn't have any information. I  
 12 came out empty-handed from the Bahamas.  
 13 **Q Well, when did you learn about the sex tape?**  
 14 A The original meeting with the nannies.  
 15 **Q But you didn't feel -- but that's the one you**  
 16 **felt like you came away empty-handed?**  
 17 A Right.  
 18 **Q You didn't have an opportunity to get the**  
 19 **information from the nannies about the sex tape?**  
 20 A I did.  
 21 **Q You just didn't feel like it was adequate**  
 22 **enough, that you still came away feeling like you were**  
 23 **empty-handed?**  
 24 A It wasn't important. Who cares about that. It  
 25 wasn't important to me.

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1 **WILMA VICEDOMINE**  
 2 **Q So you didn't mention it to Ms. Cosby in that**  
 3 **first three- to five-hour conversation?**  
 4 A No.  
 5 **Q How many conversations into y'all's discussions**  
 6 **do you think it was when you decided to tell her about**  
 7 **it?**  
 8 A I think it's closer to the end of our  
 9 conversations that it came up.  
 10 **Q When did you have the last conversation with**  
 11 **her before the publication of the book?**  
 12 A I think it was in July.  
 13 **Q So you believe you told her about the nannies**  
 14 **in July of 2007?**  
 15 A Right.  
 16 **Q Was it news to her? Had she heard it before?**  
 17 A She heard it before.  
 18 **Q From whom?**  
 19 A I believe it came from Donna Kauffman.  
 20 **Q Donna Kauffman?**  
 21 A Uh-huh.  
 22 **Q Did she tell you that?**  
 23 A Donna Kauffman told me that.  
 24 **Q When did Donna Kauffman tell you that?**  
 25 A After the book came out.

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1 **WILMA VICEDOMINE**  
 2 **Q Did Donna Kauffman tell you when she first told**  
 3 **Rita Cosby about the nannies and the sex tape story?**  
 4 A No.  
 5 **Q So if I understand it correctly, when you told**  
 6 **Rita in July, did she ask you about it or did you**  
 7 **volunteer it at that time?**  
 8 A I think she asked me about it.  
 9 **Q And was it your understanding from Rita that**  
 10 **she had heard this story from Donna Kauffman and was**  
 11 **asking you if you knew anything about it?**  
 12 A I don't think she ever mentioned Donna Kauffman  
 13 at all. I think she just said, you know, that I hear  
 14 something like this.  
 15 **Q Now, are you telling me -- Don Clark had never**  
 16 **discussed it with her, had he?**  
 17 A I don't know.  
 18 **Q Did you ever ask him?**  
 19 A No.  
 20 **Q At any time as we sit here today, did you ever**  
 21 **ask Mr. Clark if he had any discussions with Rita about**  
 22 **the nannies before the publication of the book?**  
 23 A No.  
 24 **Q Did you take notes about your meetings -- this**  
 25 **meeting with the nannies where you say you came away**

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1 **WILMA VICEDOMINE**  
 2 A Yes.  
 3 **Q And then it was after that conversation that**  
 4 **this information about a videotape was in some fashion**  
 5 **disclosed?**  
 6 A Yes.  
 7 **Q Which you took as insignificant?**  
 8 A Correct.  
 9 **Q Didn't follow up on any details?**  
 10 A No.  
 11 **Q Didn't take any efforts in your own to try to**  
 12 **verify whether such a tape existed?**  
 13 A It was irrelevant.  
 14 **Q Did Ms. Cosby ask you if you had ever seen the**  
 15 **videotape?**  
 16 A I believe she did.  
 17 **Q Did you tell her that you had not?**  
 18 A I said, "Hell no," quite frankly.  
 19 **Q Did you tell her you didn't know whether the**  
 20 **tape existed or not?**  
 21 A I -- that -- I did say that.  
 22 **Q You told her you didn't know whether there was**  
 23 **an actual tape or not, right?**  
 24 A No, I said that I didn't know where it was  
 25 if it -- you know, where it was, whether it's in her  
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1 **WILMA VICEDOMINE**  
 2 house or whatever the case --  
 3 **Q Or whether it even existed?**  
 4 A No, I believed the nannies.  
 5 **Q Had you ever spoken to the nannies before that**  
 6 **day?**  
 7 A No.  
 8 **Q And this "videotape" discussion took about how**  
 9 **long? Sounds like something less than 15 seconds.**  
 10 A It was only few minutes.  
 11 **Q Few minutes or 15, 30 seconds?**  
 12 A I don't know. Between a few seconds and a  
 13 minute or so.  
 14 **Q Okay.**  
 15 A It wasn't long.  
 16 **Q And that was part of -- I think you said you**  
 17 **stayed there about two more hours with the nannies.**  
 18 A No. The first hour we sat down and did the  
 19 introductions and started talking about the money issue.  
 20 Then we broke -- we broke for the lunch break. And then  
 21 after that for another hour or so, they kept talking  
 22 about the money. And then after that, we just discussed  
 23 a little bit about the so-called evidence that she  
 24 claimed she had. And then talked about the -- there  
 25 were some pleasantries in there, you know, just talking  
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1 **WILMA VICEDOMINE**  
 2 about non-related stuff, Bahamas life, things like that.  
 3 **Q And how long did that last?**  
 4 A Probably about an hour. A half an hour or so.  
 5 **Q Now, Ms. Cosby did in fact ask you to give her**  
 6 **the circumstances around the meeting with the nannies,**  
 7 **did she not?**  
 8 A Yeah, I believe she did.  
 9 **Q And did you give her the circumstances of how**  
 10 **y'all talked for three hours?**  
 11 A Oh, no, circumstances. I thought you meant  
 12 what got us to go there in the first place.  
 13 **Q No, I'm asking when you gave this information**  
 14 **to Ms. Cosby, you say she asked you about it, did you**  
 15 **have any information about the nannies and the**  
 16 **videotape, right?**  
 17 A Yes. Well --  
 18 **Q In July?**  
 19 A No. Let me say this. I know that she asked if  
 20 I heard something like this. And that's what prompted  
 21 me to mention about the tape. But did she ask me about  
 22 how long the meeting lasted and what's going on, I just  
 23 told her it was a waste of time, that was it.  
 24 **Q And did she say, "What do you mean by that when**  
 25 **you say waste of time?"**  
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1 **WILMA VICEDOMINE**  
 2 A I just said it was a waste of time, got  
 3 nothing.  
 4 **Q Got nothing of any substance from the nannies,**  
 5 **is that what you told her?**  
 6 A Yes.  
 7 **Q And you didn't tell her you thought the nannies**  
 8 **were credible? She didn't ask you that, did she?**  
 9 A She did.  
 10 **Q And you told her they were?**  
 11 A I thought they were, yes.  
 12 **Q And did you tell her what -- did she say, "What**  
 13 **do you base that on?"**  
 14 A I just said like, for instance, I asked the  
 15 nannies about the affidavits, what was the issue about  
 16 this -- these affidavits that was paid for. You know,  
 17 and they corrected that issue for me. I asked them what  
 18 was the discrepancies, you know, that upset them so  
 19 much, what did they do to follow up. And that's why I  
 20 found them credible.  
 21 **Q And did you tell that to Ms. Cosby?**  
 22 A Yes.  
 23 **Q So she was aware of affidavits and the**  
 24 **discrepancies and inconsistencies in the affidavits,**  
 25 **wasn't she?**  
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1 WILMA VICEDOMINE

2 call me up.

3 **Q For you to get a quote for her to use in an**4 **article?**

5 A Yes.

6 **Q And who did you understand that she worked for?**

7 A I believe she's an independent journalist.

8 **Q Yeah. And who -- where are her articles**9 **generally published?**

10 A I believe it's in the National Inquirer and the

11 Globe.

12 **Q Two tabloids?**

13 A Yes.

14 **Q Do you know of any other publications where**15 **Ms. Kauffman's articles have been published with quotes**16 **from Don Clark, other than either the National Inquirer**17 **or the Globe?**

18 A No.

19 **Q And so calling you to ask for a quote from**20 **Mr. Clark. How did it come up about the videotape and**21 **Rita Cosby?**

22 A We debated a lot about the drugs. You know,

23 she is obviously acquainted with Dr. Perper. And, you

24 know, I wanted to know what was the deal with the drugs,

25 you know. And so we debated that quite a bit.

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1 WILMA VICEDOMINE

2 **Q I'm asking you about how it came up had you had**3 **the conversation with her in October about her telling**4 **you that she had told Rita Cosby about the videotape?**

5 A We were talking about all this media hoopla

6 that was going on about the tape, you know, and she said

7 that she told Don -- Rita about it.

8 **Q Told who about it?**

9 A Donna told Rita about it.

10 **Q And did she tell you a timeframe that led you**11 **believe that she had told Rita about it before you**12 **talked to Rita in July about it?**

13 A No, but I understood it was much earlier.

14 **Q You understood from talking to Donna Kauffman**15 **that she had told Rita about the videotape much earlier**16 **than July of 2007?**

17 A Yes. I believe that Donna Kauffman was trying

18 to write an article or do a deal with the nannies. And

19 that's when the nannies told her about it and that they

20 just didn't do it.

21 **Q She was trying to work some sort of a deal with**22 **the nannies to do an article about the videotape?**

23 A Yeah, pay them a --

24 MS. MCNAMRA: Object to form.

25 **Q (BY MR. WOOD) Let me restate it. Did Donna**

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1 WILMA VICEDOMINE

2 **Kauffman tell you that she was trying to work some sort**3 **of deal with the nannies to do an article about the**4 **videotape?**

5 A No.

6 MS. MCNAMRA: Same objection.

7 **Q (BY MR. WOOD) What did she tell you in terms**8 **of what -- you said that she was trying to do an article**9 **or do a deal with the nannies. What did you mean?**

10 A About what was going on in the house in the

11 Bahamas.

12 **Q Well, did that include the videotape?**

13 A I don't know.

14 **Q Well, what brought up the videotape?**

15 A The national media was going crazy about this

16 book that has this tape in it. And that came up. And

17 she just said, you know, that I mentioned that to Rita

18 much earlier.

19 **Q And when she said she mentioned that to Rita,**20 **she mentioned that she had information that the nannies**21 **had seen a videotape of Larry Birkhead and Howard Stern**22 **engaging in sex?**

23 A Yes.

24 **Q And that she had conveyed that to Rita Cosby**25 **months earlier than when you discussed it with Rita in**

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1 WILMA VICEDOMINE

2 **July of 2007 --**

3 A Yes.

4 **Q -- is that right?**

5 A Yes.

6 **Q Did she tell you why she never did an article**7 **about it?**

8 A Apparently her editors just didn't want to go

9 there.

10 **Q That would have been months earlier, right?**

11 A Yes, I believe it was early -- it was in May or

12 something.

13 **Q In May of -- she told you that at least May of**14 **2007, she had pitched the videotape story about the**15 **nannies and the sex tape to others and they didn't want**16 **to go there?**

17 A Actually, it's earlier than that, because it's

18 Donna Kauffman that gave me the -- Liz Thompson's phone

19 number. So I went to see Liz Thompson on May 5th, so it

20 was definitely a couple weeks earlier than she -- that

21 she told me that, yes.

22 **Q So before you went to see the nannies on May**23 **the 5th, Donna Kauffman had already told you about this**24 **alleged story that the nannies had seen a sex video of**25 **Howard Stern and Larry Birkhead?**

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1 WILMA VICEDOMINE

2 A No.

3 Q What did she tell you about the videotape?

4 A Nothing.

5 Q Did she just give you the number to the nannies?

6 A She just said, "Look, I tried to talk to the nanny" -- you know, we tried to do this article. It's not working out. And she said -- she e-mailed me her phone number, she said, "You might give it a try." That's it.

12 Q Did she tell you anything about the article including any reference to the videotape?

14 A Nothing.

15 Q When did she first tell you about the videotape being known to her? When did she tell you she learned about it?

18 MS. MCNAMRA: Objection, asked and answered.

20 A I don't know.

21 Q (BY MR. WOOD) Did she ever tell you how she heard the allegation?

23 A Know it just came from the nannies. That's all I know.

25 Q Did she actually get that -- did she tell you

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1 WILMA VICEDOMINE

2 she heard that from the nannies or that --

3 A Yes.

4 Q -- she had heard someone say the nannies had said it?

6 A No, she said she got that directly from the nannies.

8 Q In the Bahamas?

9 A I don't know where she was when she got it.

10 Q Months before Rita Cosby learned about it from you?

12 A Months before Rita --

13 Q Well, some couple of months.

14 A Yeah, it must have been in April, because that's when the deal with the nannies fell through.

16 Q So she went down -- or she interviewed the nannies and that's when she learned about the videotape, right?

19 A That's what I understand, yes.

20 Q From her, Don Kauffman. And she pitched that story to her editor at either the National Inquirer or the Globe. And they wouldn't go there with the story, they didn't publish the story. Is that what you understood?

25 A I don't know what she pitched to them. She

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1 WILMA VICEDOMINE

2 told me she was trying to do a story on the nannies and especially about the drugs and everything that was going on in the house. She never mentioned the videotape.

5 Q She didn't tell you that -- well, she did mention the videotape to you -- strike that. Am I right that what she said to you is that after the book came out and it had this story in it about the videotape, that you were talking to her about another matter and it came up from her that, "You know, I heard that from the nannies and tried to pitch that story, but my publishers wouldn't go with it." Is that the way it came out, ma'am?

14 MS. MCNAMRA: Objection, form.

15 A Not at all.

16 Q (BY MR. WOOD) Well, why did she bring it up to you?

18 A Like I said the third time now, this came up on the national media. Everybody was going crazy about this tape. And Donna just made an offhand comment that, you know, she told Rita about that. That's it. We never discussed it, nothing.

23 Q Some months before you told Rita, she told Rita?

25 A Yes.

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1 WILMA VICEDOMINE

2 MR. WOOD: Why don't we take a break.

3 THE VIDEOGRAPHER: We're going off the record. The time is 2:42.

5 (A recess was taken.)

6 THE VIDEOGRAPHER: We're back on the record. The time is 3:00 o'clock.

8 Q (BY MR. WOOD) Ms. Vicedomine, let me make sure I'm clear. You told me, I believe, that you went down in April of 2007 with Mr. Clark and that's when you interviewed Moe and Tas?

12 A No, I think it was in March.

13 Q I thought you said you went down in March and interviewed the sea captain and you went down in April and you interviewed Moe and Tas.

16 A Yes, that's right. I'm sorry.

17 Q All right. So let's -- just so that's clear, the first time you interviewed Moe and Tas would have been April of 2007, right?

20 A Around there, yes.

21 Q And you had not spoken with them by telephone prior to meeting them at the interviews in Florida, true?

24 A Only with Paul Porter.

25 Q Well, I'm talking about with Moe and Tas now,

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1 WILMA VICEDOMINE  
2 her about it?

3 A No.

4 Q What did she say when you told her?

5 A Oh, I don't recall what she said, but I know we  
6 just talked about it, I said what happened, and that was  
7 it.

8 Q What did she -- do you recall anything she said  
9 in response to your telling her about this --

10 A No.

11 Q -- alleged sex video?

12 A No, I don't.

13 Q But she asked you about it?

14 MR. MCFALL: Objection, asked and  
15 answered.

16 Q (BY MR. WOOD) Is that right?

17 A She asked if I knew something about it,  
18 something like that.

19 Q Tell me exactly what you recall her asking you.

20 A I just did.

21 Q Tell me your opinion -- in her words, what did  
22 she say to you?

23 A I can't recall her words exactly.

24 Q Did she call you and start right away talking  
25 about whether or not you knew anything about a sex

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1 WILMA VICEDOMINE  
2 video?

3 A No.

4 Q Did that come up later in the conversation?

5 A Yes.

6 Q Tell me how it came up in terms of how it was  
7 broached by her.

8 A I can't recall.

9 Q You don't recall what she said in terms of  
10 asking --

11 A I don't know how it came up. I can't remember.

12 Q And tell me again, you said you had the hour  
13 lunch with Don, didn't buy you a glass of wine. And  
14 then you went back and you spent another hour with the  
15 nannies and Liz Thompson and Lincoln Bain?

16 A About an hour and a half.

17 MR. MCFALL: Objection, asked --

18 Q (BY MR. WOOD) About another --

19 MR. MCFALL: -- and answered.

20 Q (BY MR. WOOD) About another hour and a half?

21 A Yeah.

22 Q And how much of that hour and a half was taken  
23 up with the continued discussions about payments to the  
24 nannies?

25 A About an hour.

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1 WILMA VICEDOMINE

2 Q And then it was after that hour that Liz  
3 Thompson said what?

4 A About what?

5 MR. MAYNARD: Objection to form.

6 Q (BY MR. WOOD) Well, I mean you had not in that  
7 next -- that first hour after lunch didn't have the sex  
8 video discussion, did you?

9 A In the first hour, no.

10 Q Right. So you've been with the nannies for an  
11 hour, then you break for lunch for an hour, then you  
12 come back, and an hour goes by and you've not been told  
13 anything about a sex video up to that point in time,  
14 right?

15 A Correct.

16 Q And tell me how it came up.

17 A After discussions concluded about the money  
18 issue, I wanted to know what can they testify to, you  
19 know, what do they know about what went on in the house.  
20 And Liz Thompson wouldn't let them ask -- wouldn't let  
21 them answer anything that she considered to be evidence,  
22 so she said I could only ask a generic question.

23 Q Well, let me ask you this. Had you and Don  
24 talked about trying to get them to give you some  
25 indication of what they knew that would justify the

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1 WILMA VICEDOMINE  
2 payments they were demanding?

3 A That's it, correct, yes.

4 Q Y'all had that discussion at lunch?

5 A No, we didn't really talk about it at lunch.

6 Q When did you talk about it?

7 A We talked about it when we got back.

8 Q Got back from when?

9 A From the Bahamas.

10 Q I'm talking about had you and Don at lunch  
11 talked about, "We need to try to find out what these  
12 people know that would justify some type of payment"?

13 A No.

14 Q Well, why were you allowed to ask a generic  
15 question?

16 MR. MAYNARD: Objection.

17 A I said that it's really fine that we're sitting  
18 here talking about money and I have no idea what you can  
19 testify to. I need to know something that you can  
20 testify to.

21 Q (BY MR. WOOD) And you said that?

22 A I did.

23 Q And did then -- you were asking for some sort  
24 of a preview as to what they could testify to --

25 A Yes.

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1 **WILMA VICEDOMINE**  
2 **source?**  
3 A I don't have to answer that question.  
4 **Q Yes, you do. You put it out there --**  
5 A I don't have to tell you --  
6 **Q -- on the blogs --**  
7 A -- the results of what I --  
8 **Q I can get the judge to order you to answer. I**  
9 **don't think we really need to go there, ma'am. You put**  
10 **information about the wire transfer on the blogs that**  
11 **you had obtained from your investigation, right?**  
12 A Yes.  
13 **Q And you did it to see if you could get**  
14 **corroboration from any other source, right?**  
15 A Yes.  
16 **Q Did you get corroboration from any other**  
17 **source?**  
18 A I do not recall.  
19 **Q As you sit here today, you don't recall getting**  
20 **any corroboration from any other source about the wire**  
21 **transfer, do you?**  
22 A I don't recall.  
23 **Q You don't recall getting any, do you?**  
24 A No, I don't.  
25 **Q That was the \$37,000.**

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1 **WILMA VICEDOMINE**  
2 A Thirty-seven something, yes.  
3 **Q That Tas allegedly saw on Mr. Stern's computer?**  
4 A Yes.  
5 **Q Did she tell you where that computer was**  
6 **located?**  
7 A Yes.  
8 **Q Did she tell you how long she had looked at it?**  
9 A No.  
10 **Q Did she -- did you ask her what it said other**  
11 **than some \$37,000 wire transfer?**  
12 A Yes.  
13 **Q Who was it a transfer from?**  
14 A She couldn't remember.  
15 **Q Who was it a transfer to?**  
16 A She couldn't remember.  
17 **Q When had the transfer taken place?**  
18 A That day.  
19 **Q Did Tas tell you that she had learned that her**  
20 **husband had been with another woman in the hotel room**  
21 **the night before?**  
22 A Only after the book came out.  
23 **Q When did she tell you about that?**  
24 A Several months after the book came out.  
25 **Q And did she in fact tell you that she learned**

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1 **WILMA VICEDOMINE**  
2 **it first in the book?**  
3 A I didn't ask her where she learned it.  
4 **Q What was her reaction to it?**  
5 A I just asked her whether she was okay.  
6 **Q And what did she tell you?**  
7 A She says they're fine.  
8 **Q Did you ever learn that Moe was out trying to**  
9 **shop a book deal?**  
10 A I did hear that.  
11 **Q Huh?**  
12 A I did.  
13 **Q When did you hear that?**  
14 MR. MCFALL: Is that before or after  
15 March 27?  
16 MR. WOOD: Public domain, Don. She's been  
17 on the Internet -- she's been on the Internet -- look,  
18 she --  
19 MR. MCFALL: Are you answering --  
20 MR. WOOD: Let me explain it to you, I  
21 mean, because I know you're new to the case. She comes  
22 in here and she's the person going out and getting all  
23 this information from the Internet that is in the public  
24 domain. I'm entitled to know what she learned from that  
25 public domain source.

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1 **WILMA VICEDOMINE**  
2 MR. MCFALL: Here's the problem I'm  
3 asking. You didn't ask her if she's learned on the  
4 Internet that Moe was trying to shop a book. She could  
5 have learned it somewhere else as part of her  
6 investigation.  
7 MR. WOOD: I said, "When did you hear  
8 that?"  
9 MR. MCFALL: All right. Was that before  
10 or after March 27?  
11 THE WITNESS: That's just it, I can't  
12 answer the question.  
13 **Q (BY MR. WOOD) You can't answer when you heard**  
14 **it?**  
15 A Correct.  
16 **Q Could it have been before March 27th?**  
17 A No.  
18 **Q Was it something you learned from your Internet**  
19 **research?**  
20 A No.  
21 **Q Was it something you learned from an interview?**  
22 A Yes.  
23 **Q Was it an interview of Moe or Tas?**  
24 A No.  
25 MR. MCFALL: Don't answer that, if you

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1 WILMA VICEDOMINE

2 A True.

3 Q No -- none -- none of the authorities that have  
4 investigated the deaths of Anna Nicole Smith or Daniel  
5 Smith have found any criminal involvement on the part of  
6 Howard Stern, true?

7 A Yes.

8 Q And what do you believe that they didn't do  
9 that you did?

10 A I don't know how to answer that question,  
11 because there is just so much information that's  
12 contradictory to what, for instance, Dr. Perper wrote  
13 here.

14 MR. MCFALL: I want to remind you that  
15 information is what you found out after March 27, 2007,  
16 so I would instruct you not to answer the question.

17 Q (BY MR. WOOD) Do you think you did a more  
18 thorough and complete investigation into the deaths of  
19 Anna Nicole Smith and Daniel Smith than the authorities  
20 in the Bahamas or the authorities in Florida?

21 A Yes.

22 MR. MAYNARD: Objection to form.

23 Q Do you base that primarily on your extensive  
24 and exhaustive and comprehensive search of materials  
25 online and on the Internet?

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1 WILMA VICEDOMINE

2 MR. MAYNARD: Objection, form.

3 MR. MCFALL: Objection, mischaracterizes

4 testimony.

5 A Yes.

6 Q (BY MR. WOOD) Did you call Larry Birkhead in  
7 May of 2000 [sic.] and state to him that you thought he  
8 was a good guy, but he needed to get rid of Howard Stern  
9 as a --

10 MR. MCFALL: As part of your investigation  
11 after --

12 MR. WOOD: Not asking about the

13 investigation, I'm asking --

14 MR. MCFALL: -- March 27, 2007, don't

15 answer --

16 MR. WOOD: -- asking if she said that to

17 him.

18 Q (BY MR. WOOD) Did you call Larry and tell him  
19 that?

20 A Yes.

21 MR. MCFALL: If it -- if it was after

22 March 27 --

23 MR. WOOD: And did he --

24 MR. MCFALL: Shut up.

25 MR. WOOD: She's already answered -- what

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1 WILMA VICEDOMINE

2 did you just say to me?

3 MR. MCFALL: I said shut up. Let me --

4 MR. WOOD: Let me tell you something, old  
5 man. Don't -- don't say that to me, that's  
6 inappropriate. I'm not going to yell at you, you're  
7 not --

8 MR. MCFALL: You keep interrupting my  
9 objection.

10 MR. WOOD: No, sir. No, sir. She  
11 answered the question. Don't you look over at me and  
12 tell me to shut up. You may be old enough to be my  
13 father, but you're not.

14 MR. MCFALL: God, this is --

15 MR. WOOD: No, sir. That's  
16 unprofessional.

17 MR. MCFALL: You keep interrupting me when  
18 I try to make an objection.

19 MR. WOOD: It is unprofessional for you to  
20 sit on this record and tell me to shut up.

21 MR. MCFALL: It's unprofessional --

22 MR. WOOD: Maybe that's the way you do  
23 things down here in Texas with a bunch of unprofessional  
24 lawyers and unethical lawyers, but that's not the way we  
25 do it in Georgia where we have professionalism and

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1 WILMA VICEDOMINE

2 ethics.

3 MR. MCFALL: May I make my statement now?

4 MR. WOOD: Yes, sir, but you watch your  
5 mouth when you talk to me like that.

6 MR. MCFALL: Will you let me finish this  
7 time?

8 If this occurred after March 27, 2007, I  
9 instruct you not to answer the question.

10 THE WITNESS: Okay.

11 Q (BY MR. WOOD) You just answered it, didn't  
12 you?

13 A I guess I did.

14 Q Yeah.

15 MR. MCFALL: In the middle of my  
16 objection, she answered it. That's right.

17 You let me finish my objection before you  
18 answer.

19 Q (BY MR. WOOD) And Larry Birkhead, when you  
20 said that to him, refused to say that he would get rid  
21 of Howard, didn't he?

22 MR. MCFALL: And I'm going --

23 A Apparently I'm not talking about that.

24 MR. MCFALL: I'm going to make the same  
25 objection.

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