

1 A. As far as I know, he did not.

2 Q. What did you do to prepare for this deposition?

3 Did you review any notes or documents?

4 A. No.

5 Q. Where were you born?

6 A. Killeen, Texas.

7 Q. Do you spell that C-O-L-L-E-E-N?

8 A. No. K-I-L-L-E-E-N.

9 Q. Do you have any siblings?

10 A. Yes.

11 Q. What are their names?

12 A. I have a brother; his name is Michael Dennis

13 Lollar.

14 Q. Any other?

15 A. No.

16 Q. Is your father still alive?

17 A. Yes.

18 Q. What's his name?

19 A. Luther Lollar.

20 Q. And where does he reside?

21 A. Mineral Wells, Texas.

22 Q. And what is the name of the place where he

23 lives?

24 A. He's in nursing care.

25 Q. What's the name of the nursing case?

1 A. I would rather not disclose that information.

2 Q. You realize you have to answer all questions
3 that I ask today?

4 A. I would rather not disclose that information.

5 Q. Please tell me the name of the location.

6 A. He's -- there's only three nursing homes in
7 Mineral Wells, and he's in one of those. And I respect
8 his privacy, and I do not want to disclose that
9 information.

10 Q. Please tell me the name of the nursing home.

11 A. It is --

12 MR. TURNER: She's already answered your
13 question, ma'am. She's not going to give you the name
14 of the nursing home.

15 MS. CUMMINS: You didn't file a protective
16 order to the name of the nursing home before this
17 deposition, you have to answer the question.

18 MR. TURNER: She's not going to answer it.

19 MS. CUMMINS: I reserve the right to depose
20 Ms. Lollar again in order to get the name of the nursing
21 home.

22 MR. TURNER: We're asserting a privilege.

23 MS. CUMMINS: What is the privilege?

24 MR. TURNER: Right of privacy.

25 Q. (BY MS. CUMMINS) Have you ever used any other