

IN THE CIRCUIT COURT OF THE  
NINTH JUDICIAL CIRCUIT IN AND  
FOR ORANGE COUNTY, FLORIDA

CASE NO.: 08-CA-24573

ZENAIDA GONZALEZ,

Plaintiff/Counter Defendant,

vs.

CASEY ANTHONY,

Defendant/Counter Plaintiff.

\_\_\_\_\_ /

MOTION TO COMPEL

COMES NOW the Plaintiff, ZENAIDA GONZALEZ, by and through the undersigned attorneys, and pursuant to Rule 1.380, Florida Rules of Civil Procedure files this Motion to Compel and would show unto the Court the following:

1. George Anthony's deposition was taken on April 9, 2009 in the above-styled cause of action.
2. During the deposition, George Anthony refused to answer the following questions, attached hereto as Exhibit "A":

Q: Were there incidences in the year leading up to the disappearance where your daughter had taken money, to your knowledge, that didn't belong to her?

A: Not going to answer that.

MR. CONWAY: That's irrelevant. There are criminal charges pending against her. It's going to affect the ability of her to get a fair trial, so we're not going to answer that question in this forum.

BY MR. MITNIK:

Q: Okay, sir. Just so we're clear, so you can think about the wisdom of taking that position, the relevance here is that if she's having to take money from others, then how in the world does she have money to pay for a baby-sitter once a week or every week? And it is highly relevant to this case. So I'm going to ask it one more time and see if you want to answer the question so we don't have to come back on another day, because I know you'd probably rather not, on a motion to compel.

Was your daughter taking money that did not belong to her from others, to your knowledge, in the year leading up to this?

A: I'm not answering that.

Q: You refuse to answer it?

A: Take it any way you want to take it. Refuse it. I'm not answering it. It's no concern about this lady here sitting down here. It's no concern.

p. 21, L15 – p. 22, L16

\* \* \*

Q: The investigator, Dominic Casey, did he work for you or the family at any time?

MR. CONWAY: You can answer that.

A: He's worked for us, I believe, since about November of 2008.

Q: And "us" would be who?

A: The Anthony family, Cindy and I.

Q: And would that mean you-all were paying his bill?

MR. CONWAY: That's privileged. It's work product.

MR. MITNIK: Work product why?

MR. CONWAY: It's attorney-client.

MR. MITNIK: Work product in what litigation?

MR. CONWAY: He's working for the Anthonys in regard to the criminal investigation as well as the disappearance of their granddaughter.

p. 29, L25 – p. 30, L16

\* \* \*

Q: Did you, with the investigator that was working for you and your wife –

MR. CONWAY: Listen to the question. All right?

Q: -- did you -- Dominic Casey -- did you give him any leads as to where to go look?

A: No.

Q: How about your wife, to your knowledge?

A: No.

Q: Where did -- to your knowledge, where did he get the lead?

A: Just like on TV that I saw, supposedly from a psychic.

MR. CONWAY: George. Not going to answer the question. It's privileged.

p. 34, L11 – 25

\* \* \*

Q: Okay. And what reports did you get back as to their efforts to find Zanny?

A: You're going to have to ask the sheriff's department about that.

Q: No, your investigators. What reports did you get back?

MR. CONWAY: That's privileged information. It's privileged information.

MR. MORGAN: Why is it privileged?

MR. CONWAY: Because he hired them. They worked for him. Everything that was given to them is work product.

MR. MORGAN: That doesn't work.

MR. CONWAY: And it had everything to do with the fact they were being investigated by the sheriff's office. There were obstruction of justice charges thrown around.

MR. MORGAN: You're taking the privilege based on no pending lawsuit?

MR. CONWAY: I'm taking the privilege based on pending criminal charges at the time.

MR. MORGAN: Against the Anthonys?

MR. CONWAY: Yes, sir.

MR. MORGAN: George and Cindy?

MR. CONWAY: According to the sheriff's office, they were being investigated and could be charged with obstruction charges.

MR. MORGAN: Not now or still?

MR. CONWAY: At this point, no, absolutely not.

MR. MORGAN: Then you have no privilege.

MR. CONWAY: There's privilege. We'll certify it to the judge and deal with the judge on it.

MR. MITNIK: Okay. I just don't want to hear about taking up people's time when we're back here.

p. 41, L18 – p. 43, L2

\* \* \*

Q: Okay. And you at that point in time attempted to go into the trunk of her car; is that right?

A: I'm not going to answer that.

Q: And she blocked you from getting into the car?

A: I'm not going to answer that.

Q: Okay. On what grounds?

A: That's part of a criminal investigation that has nothing to do with the civil matter here.

Q: So any questions that I would ask you about that incident you won't tell us about?

MR. CONWAY: It's our position that this is videotaped. There will immediately be copies given out to the media. All of this affects the criminal investigation that's ongoing as well as her right to a fair trial.

So anything that has to do with Zenaida Gonzalez and the defamation suit he wants to answer on point correctly and accurately as possible, but whatever has to do with the criminal investigation and nothing to do with Zenaida Gonzalez, he's not going to answer those questions. We'll certify them and answer them under different circumstances, if the judge orders that.

MR. MITNIK: So if I ask did she basically run to the car and get in it and slam it down before you could get into the trunk, he's not going to answer any of those questions?

MR. CONWAY: He's not going to answer those questions here today on videotape.

MR. DILL: Let me just say that what he's referring to has already been part of the public record. That is -- hold on, Brad, hold on.

This is the interview that has already been part of the public record that everybody has access to, and he's asking about that. So whatever privilege you're talking about, whatever Fifth Amendment right, it's not impacted by this at all, Sixth Amendment right. So this is something that he can answer that is reasonably calculated to lead to the discovery

of admissible evidence. In a civil case, that's all we have to have.

MR. CONWAY: What I'm talking about is the videotape that you intend to release immediately at the end of this deposition, and my position is that the videotape is intended to harass, annoy and put them in a position -- this is going to go on Nancy Grace with Mr. Morgan, and we're not going to answer those questions.

I mean, if you've got it, you've got it. He's given his answers under oath to law enforcement, and I don't think it's relevant to your civil suit.

p. 52, L8 -- p. 54, L8

\* \* \*

Q: Why did you tell the police officers that you felt that your daughter had not been working for the last two years?

A: I'm not going to answer it any further, sir.

Q: Why?

A: I'm not going to answer it. That's part of a criminal investigation, nothing to do with civil.

Q: Was there an incident where the ladder was missing -- was not up -- was -- I'm sorry -- was up on the outside pool that you have, the out-of-ground pool that you have and you --

THE WITNESS: Brad, I'm not answering. I'm going to have to get up and go, Brad.

MR. CONWAY: Just wait a second. Just let him ask the question.

Q: -- and you and your wife had a discussion about that subject, and you had concern in your mind that potentially your daughter had been in there with your granddaughter and something could have happened?

A: I'm not answering that.

p.57, L8 -- p. 58, L2

\* \* \*

Q: So you will not answer about concerns that potentially some harm could have come to your granddaughter in that pool with your daughter?

A: Nope, not here today, I'm not, no.

MR. MORGAN: We have two minutes of tape.

Q: Did you tell the detectives that maybe something happened, you know, I hate to think about that, but it was just because you don't talk to one special little person in your life when you didn't hear that little voice for weeks upon a time? Did you say that?

MR. CONWAY: Mr. Mitnik, you know, these questions go right into this man's heart, and they have nothing to do with Zenaida Gonzalez. I mean, have some compassion. I mean, let's clear your client, but have some compassion for this guy. You're brining up things that are horrendous thoughts for anybody, and you're needling it into him, and it's not necessary, sir.

MR. MITNIK: Just for the record, the continuous interrupting with my deposition I'm going to take to the judge --

MR. CONWAY: I understand.

MR. MITNIK: -- on your behavior, so beware.

MR. CONWAY: I understand.

MR. MITNIK: We have very strict rules on what comments should be made in a deposition and what objections should be made. The rules have tightened down from the old speaking objections and lecturing and all that, and let's --

MR. MORGAN: Let's change the tape.

MR. CONWAY: I'm just asking you to have some compassion for this family.

p. 58, L9 -- p. 59, L15

\* \* \*

So you've got five more minutes of my time. Otherwise I'm walking out of here, sir, in five minutes. So make your next question or two be relevant. If not, I'm leaving. I'm done.

THE WITNESS: I'm sorry, Brad.

MR. CONWAY: It's okay.

THE WITNESS: I'm done with it.

MR. CONWAY: It's okay. It's all right. Let's listen to the questions.

THE WITNESS: He's got five minutes.

MR. MORGAN: I think that --

MR. MITNIK: Okay. Let us do it this way. We've got a lot of stuff, and what we're going to do is we've got questions not answered. We're going to suspend this and take it with the judge so we can have some parameters on it so that we can -- because what I need to have laid out, there needs to be some understanding that this is -- certainly appreciate the painful nature of this. I hate having to ask you the questions. You can laugh about it, sir, but I am a deeply kind --

p. 70, L10 -- p. 71, L3

\* \* \*

MR. MITNIK: Okay. I want to -- we talked about a subject before. I want to be clear -- I think I was. I want to make sure I'm clear. Any questions that I ask about Dominic Casey when he went out to the woods and what he was told and what he told you-- all and all that you're taking the privilege on; am I right?

MR. CONWAY: Yes, sir.

p. 78, L1 -- 8

\* \* \*



Q: And as your private investigator, what information was he relaying to you on a daily basis, if any, about his search about his findings?

MR. CONWAY: That's privileged. It's information specifically related to the investigation, so privileged.

p. 103, L4 - 9

3. These questions are proper discovery deposition questions and no privilege applies.

WHEREFORE, Plaintiff respectfully requests that this Court enter an Order compelling George Anthony to answer these questions and request the Court to grant attorney's fees and costs incurred in bringing this Motion and any further relief that this Court deems appropriate.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of the foregoing has been furnished by mail this 23rd day of April, 2009 to Jonathan Kasen, Esq., 633 S.E. 3<sup>rd</sup> Avenue, Suite #203, Ft. Lauderdale, FL 33301 and to Bradley A. Conway, Esq., 390 N. Orange Avenue, Suite 1630, Orlando, FL 32801.



JOHN B. MORGAN, ESQUIRE

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Attorneys for Plaintiff

1           A     I just said no. I've said it five times to  
2     you. No, I have not.

3           MR. CONWAY: He answered the question already.  
4     George, just go ahead and answer it again. Have you  
5     ever --

6           A     I have not seen this Zanny who is the  
7     baby-sitter of my granddaughter. I have never met her.

8           Q     In your life?

9           A     No.

10          Q     Did you ever ask -- during the year leading up  
11     to this, when your granddaughter was being left with some  
12     other person you'd never met, did you ever ask can I meet  
13     her?

14          A     I did not.

15          Q     Were there incidences in the year leading up  
16     to the disappearance where your daughter had taken money,  
17     to your knowledge, that didn't belong to her?

18          A     Not going to answer that.

19          MR. CONWAY: That's irrelevant. There are  
20     criminal charges pending against her. It's going to  
21     affect the ability of her to get a fair trial, so  
22     we're not going to answer that question in this  
23     forum.

24     BY MR. MITNIK:

25          Q     Okay, sir. Just so we're clear, so you can

1 think about the wisdom of taking that position, the  
2 relevance here is that if she's having to take money from  
3 others, then how in the world does she have money to pay  
4 for a baby-sitter once a week or every week? And it is  
5 highly relevant to this case. So I'm going to ask it one  
6 more time and see if you want to answer the question so  
7 we don't have to come back on another day, because I know  
8 you'd probably rather not, on a motion to compel.

9 was your daughter taking money that did not  
10 belong to her from others, to your knowledge, in the year  
11 leading up to this?

12 A I'm not answering that.

13 Q You refuse to answer it?

14 A Take it any way you want to take it. Refuse  
15 it. I'm not answering it. It's no concern about this  
16 lady here sitting down here. It's no concern.

17 Q Did your daughter appear to be short on funds  
18 in the year leading up to the disappearance?

19 MR. CONWAY: If you know.

20 A I have no knowledge of that, no knowledge.

21 Q Did you ever have any discussions with her  
22 about -- with your daughter about her need for money or  
23 her finances during that year?

24 A Never discussed it with her.

25 Q Did you ever discuss with her why she would

1 Sawgrass Apartments?

2 A I didn't know anything about Sawgrass  
3 Apartments until this 15th of July 2008.

4 Q You'd never heard of it before, before then?

5 A I just said I didn't.

6 Q And how did you first hear about Sawgrass  
7 Apartments?

8 A When the investigation itself started from my  
9 missing granddaughter.

10 Q And who did you hear it from?

11 MR. CONWAY: George, you need some water?

12 THE WITNESS: I'm fine.

13 Q Who did you hear it from?

14 A If I'm not mistaken, sir, you'll have to ask  
15 the sheriff's department. That's their ongoing  
16 investigation.

17 Q Did you hear it from your daughter Casey?

18 A I heard it from the sheriff's department.

19 Q Did you ever have a conversation with your  
20 daughter relating to Sawgrass Apartments at all?

21 A No.

22 Q So she never relayed to you any story about  
23 dropping Caylee off at Sawgrass Apartments with Zanny?

24 A No.

25 Q The investigator, Dominic Casey, did he work

1 for you or the family at any time?

2 MR. CONWAY: You can answer that.

3 A He's worked for us, I believe, since about  
4 November of 2008.

5 Q And "us" would be who?

6 A The Anthony family, Cindy and I.

7 Q And would that mean you-all were paying his  
8 bill?

9 MR. CONWAY: That's privileged. It's work  
10 product.

11 MR. MITNIK: Work product why?

12 MR. CONWAY: It's attorney-client.

13 MR. MITNIK: Work product in what litigation?

14 MR. CONWAY: He's working for the Anthonys in  
15 regard to the criminal investigation as well as the  
16 disappearance of their granddaughter.

17 BY MR. MITNIK:

18 Q All right. Did you -- your wife, as I  
19 understand, indicated to investigators when they came to  
20 serve a search warrant at the house, indicated to  
21 investigators --

22 MR. CONWAY: Listen to the question.

23 Q -- that she had sent someone out to the woods  
24 ultimately where the body was found to look back in --  
25 back in November.

1 and go home.

2 A No, sir. The whole thing is this whole thing  
3 could be handled within five minutes. Don't have to go  
4 on for no two, three, four hours or the whole day, take  
5 up my time and his time and my wife's time. This could  
6 be done in no time, sir.

7 Q I'm done with my explanation. I tried. I'm  
8 going to go back to my business.

9 A Well, I hope I can sit here a little bit  
10 longer for your business.

11 Q Did you, with the investigator that was  
12 working for you and your wife --

13 MR. CONWAY: Listen to the question. All  
14 right?

15 Q -- did you -- Dominic Casey -- did you give  
16 him any leads as to where to go look?

17 A No.

18 Q How about your wife, to your knowledge?

19 A No.

20 Q where did -- to your knowledge, where did he  
21 get the lead?

22 A Just like on TV that I saw, supposedly from a  
23 psychic.

24 MR. CONWAY: George. Not going to answer the  
25 question. It's privileged.

1 department, private investigators and the FBI. Let them  
2 do their job.

3 Q So you -- would it be your testimony that you  
4 asked the private investigator to go find Zanny?

5 A The sheriff's department, the FBI and a  
6 private investigator have the resources to go and find  
7 this baby-sitter.

8 Q That wasn't my question. Did you tell the  
9 investigators that you hired to go find her?

10 MR. CONWAY: Just answer it "yes" or "no,"  
11 George.

12 A Yes.

13 Q And what information did you give them in an  
14 effort to try and locate her?

15 A Just a name that I had. That was it.

16 Q Nothing more?

17 A Nothing more.

18 Q Okay. And what reports did you get back as to  
19 their efforts to find Zanny?

20 A You're going to have to ask the sheriff's  
21 department about that.

22 Q No, your investigators. What reports did you  
23 get back?

24 MR. CONWAY: That's privileged information.  
25 It's privileged information.

1 MR. MORGAN: why is it privileged?

2 MR. CONWAY: Because he hired them. They  
3 worked for him. Everything that was given to them  
4 is work product.

5 MR. MORGAN: That doesn't work.

6 MR. CONWAY: And it had everything to do with  
7 the fact they were being investigated by the  
8 sheriff's office. There were obstruction of justice  
9 charges thrown around.

10 MR. MORGAN: You're taking the privilege based  
11 on no pending lawsuit?

12 MR. CONWAY: I'm taking the privilege based on  
13 pending criminal charges at the time.

14 MR. MORGAN: Against the Anthonys?

15 MR. CONWAY: Yes, sir.

16 MR. MORGAN: George and Cindy?

17 MR. CONWAY: According to the sheriff's  
18 office, they were being investigated and could be  
19 charged with obstruction charges.

20 MR. MORGAN: Not now or still?

21 MR. CONWAY: At this point, no, absolutely  
22 not.

23 MR. MORGAN: Then you have no privilege.

24 MR. CONWAY: There's privilege. We'll certify  
25 it to the judge and deal with the judge on it.



1 MR. MITNIK: Okay. I just don't want to hear  
2 about taking up people's time when we're back here.

3 BY MR. MITNIK:

4 Q Did you get any leads on Zanny during this  
5 time that your granddaughter was missing?

6 A I'm sure the sheriff's department, the FBI and  
7 the private investigators did.

8 Q Did you hear of any leads?

9 A No, sir, I did not.

10 Q Were you screaming bloody murder this woman,  
11 Zanny's, got my granddaughter, by gosh, why aren't we  
12 chasing her or anything like that?

13 A Again, sir, you're going to have to ask the  
14 sheriff's department, the FBI and the private  
15 investigators.

16 MR. MITNIK: Read my question back.

17 (The record was read back as requested.)

18 MR. CONWAY: Just answer it "yes" or "no."

19 A No.

20 Q Would -- in the time period leading up to the  
21 disappearance, would Caylee spend the night at Zanny's?

22 A Possibly.

23 Q To your knowledge, did she?

24 A Possibly. I don't know. That's possible.

25 Q I mean, to your knowledge, did she? Do you

1           how this is going to play out in as nice a way as we  
2           can.

3       BY MR. MITNIK:

4           Q       Okay. Your daughter, during the time that  
5       your granddaughter was missing, came into the house while  
6       you were there; is that right?

7           A       On one occasion, yes, I can think of.

8           Q       Okay. And you at that point in time attempted  
9       to go into the trunk of her car; is that right?

10          A       I'm not going to answer that.

11          Q       And she blocked you from getting into the car?

12          A       I'm not going to answer that.

13          Q       Okay. On what grounds?

14          A       That's part of a criminal investigation that  
15       has nothing to do with the civil matter here.

16          Q       So any questions that I would ask you about  
17       that incident you won't tell us about?

18                 MR. CONWAY: It's our position that this is  
19       videotaped. There will immediately be copies given  
20       out to the media. All of this affects the criminal  
21       investigation that's ongoing as well as her right to  
22       a fair trial.

23                 So anything that has to do with Zenaida  
24       Gonzalez and the defamation suit he wants to answer  
25       on point correctly and accurately as possible, but

1           whatever has to do with the criminal investigation  
2           and nothing to do with Zenaida Gonzalez, he's not  
3           going to answer those questions. We'll certify them  
4           and answer them under different circumstances, if  
5           the judge orders that.

6           MR. MITNIK: So if I ask did she basically run  
7           to the car and get in it and slam it down before you  
8           could get into the trunk, he's not going to answer  
9           any of those questions?

10          MR. CONWAY: He's not going to answer those  
11          questions here today on videotape.

12          MR. DILL: Let me just say that what he's  
13          referring to has already been part of the public  
14          record. This is -- hold on, Brad, hold on.

15          This is the interview that has already been  
16          part of the public record that everybody has access  
17          to, and he's asking about that. So whatever  
18          privilege you're talking about, whatever Fifth  
19          Amendment right, it's not impacted by this at all,  
20          Sixth Amendment right. So this is something that he  
21          can answer that is reasonably calculated to lead to  
22          the discovery of admissible evidence. In a civil  
23          case, that's all we have to have.

24          MR. CONWAY: What I'm talking about is the  
25          videotape that you intend to release immediately at

1 the end of this deposition, and my position is that  
2 the videotape is intended to harass, annoy and put  
3 them in a position -- this is going to go on Nancy  
4 Grace with Mr. Morgan, and we're not going to answer  
5 those questions.

6 I mean, if you've got it, you've got it. He's  
7 given his answers under oath to law enforcement, and  
8 I don't think it's relevant to your civil suit.

9 MR. DILL: It's not under oath.

10 MR. MITNIK: Let's stop arguing. Look, we're  
11 trying to do it once. It's not going to happen.  
12 Let's just let him take the position.

13 MR. DILL: All right.

14 MR. MORGAN: But it wasn't under oath, Brad.  
15 That's the difference.

16 MR. MITNIK: Some of this was. The fact of  
17 the matter is we all know something under oath in a  
18 statement somewhere else isn't the same as getting  
19 it into a civil -- civil case under oath. It's  
20 apples and oranges. It's not the same. I can't  
21 walk into court and use a statement in another case.  
22 You take it through a deposition. You bring it into  
23 this case. We all know it.

24 You're taking -- you're taking your client  
25 down an erroneous path, but I can't stop you. If

1       that?

2           A       No, sir. This whole thing has to do with Ms.  
3       Gonzalez down there sitting down there.

4                   MR. CONWAY: I believe your question was  
5       whether --

6           Q       why did you tell --

7                   MR. CONWAY: -- whether she told him.

8           Q       why did you tell the police officers that you  
9       felt that your daughter had not been working for the last  
10      two years?

11          A       I'm not going to answer it any further, sir.

12          Q       why?

13          A       I'm not going to answer it. That's part of a  
14      criminal investigation, nothing to do with civil.

15          Q       Was there an incident where the ladder was  
16      missing -- was not up -- was -- I'm sorry -- was up on  
17      the outside pool that you have, the out-of-ground pool  
18      that you have and you --

19                   THE WITNESS: Brad, I'm not answering. I'm  
20      going to have to get up and go, Brad.

21                   MR. CONWAY: Just wait a second. Just let him  
22      ask the question.

23          Q       -- and you and your wife had a discussion  
24      about that subject, and you had concern in your mind that  
25      potentially your daughter had been in there with your

1 granddaughter and something could have happened?

2 A I'm not answering that.

3 MR. CONWAY: It's conversation between the  
4 husband and wife, Mr. Mitnik.

5 MR. MITNIK: Well, any -- it's waived when  
6 it's given to a third party. We'll just take it to  
7 the judge.

8 BY MR. MITNIK:

9 Q So you will not answer about concerns that  
10 potentially some harm could have come to your  
11 granddaughter in that pool with your daughter?

12 A Nope, not here today, I'm not, no.

13 MR. MORGAN: We have two minutes of tape.

14 Q Did you tell the detectives that maybe  
15 something happened, you know, I hate to think about that,  
16 but it was just because you don't talk to one special  
17 little person in your life when you didn't hear that  
18 little voice for weeks upon a time? Did you say that?

19 MR. CONWAY: Mr. Mitnik, you know, these  
20 questions go right into this man's heart, and they  
21 have nothing to do with Zenaida Gonzalez. I mean,  
22 have some compassion. I mean, let's clear your  
23 client, but have some compassion for this guy.  
24 You're bringing up things that are horrendous  
25 thoughts for anybody, and you're needling it into

1 him, and it's not necessary, sir.

2 MR. MITNIK: Just for the record, the  
3 continuous interrupting with my deposition I'm going  
4 to take to the judge --

5 MR. CONWAY: I understand.

6 MR. MITNIK: -- on your behavior, so beware.

7 MR. CONWAY: I understand.

8 MR. MITNIK: We have very strict rules on what  
9 comments should be made in a deposition and what  
10 objections should be made. The rules have tightened  
11 down from the old speaking objections and lecturing  
12 and all that, and let's --

13 MR. MORGAN: Let's change tape.

14 MR. CONWAY: I'm just asking you to have some  
15 compassion for this family.

16 THE VIDEOGRAPHER: The time is 11:20. We'll  
17 go off record.

18 (A 4-minute recess was had.)

19 THE VIDEOGRAPHER: The time is 11:24 a.m.  
20 We're back on record.

21 BY MR. MITNIK:

22 Q What do you know about your daughter changing  
23 the story of Zenaida Gonzalez being dropped off at  
24 Sawgrass to being kidnapped at Blanchard Park?

25 A I have no knowledge about that.

1 Q Me too, sir.

2 A Because you know something?

3 Q I wouldn't wish it on anyone.

4 A But do you know something? If you did and you  
5 needed some help, I'd be there to help you. You know  
6 why? Because I care. I care. That's more than I can  
7 say about what's going on right now.

8 So you've got five more minutes of my time.  
9 Otherwise, I'm walking out of here, sir, in five minutes.  
10 So make your next question or two be relevant. If not,  
11 I'm leaving. I'm done.

12 THE WITNESS: I'm sorry, Brad.

13 MR. CONWAY: It's okay.

14 THE WITNESS: I'm done with it.

15 MR. CONWAY: It's okay. It's all right.

16 Let's listen to the questions.

17 THE WITNESS: He's got five minutes.

18 MR. MORGAN: I think that --

19 MR. MITNIK: Okay. Let us do it this way.

20 We've got a lot of stuff, and what we're going to do  
21 is we've got questions not answered. We're going to  
22 suspend this and take it with the judge so we can  
23 have some parameters on it so that we can -- because  
24 what I need to have laid out, there needs to be some  
25 understanding that this is -- certainly appreciate



1 the painful nature of this. I hate having to ask  
2 you the questions. You can laugh about it, sir, but  
3 I am a deeply kind --

4 THE WITNESS: I am laughing about --

5 MR. MITNIK: I understand. But the fact is  
6 you don't know me, and I'm a kind-hearted person. I  
7 hate asking these questions, but I also have an  
8 obligation, a deep obligation to this lady here.  
9 And it doesn't simply end with you saying she wasn't  
10 the person. I appreciate you saying that very much.  
11 If you shake her hand and say I'm sorry, that will  
12 touch my heart, but it doesn't change the fact that  
13 I have more work to be done in this case for things  
14 that your daughter did, not you or your wife. Your  
15 daughter did. And it creates a very difficult, hard  
16 job to do what I have to do for her because of some  
17 bad things that happened to her daughter.

18 So I need some parameters from the Court, so  
19 that -- and I honestly think you genuinely don't  
20 understand the limits of what our jobs are here, and  
21 I think if we have some parameters from the Court,  
22 we can come back with a clear understanding and we  
23 can tant this down a little bit, let me do my job  
24 that is an unpleasant one. I'd rather be doing many  
25 other things today than talking to you in this

1 MR. MITNIK: Okay. I want to -- we talked  
2 about a subject before. I want to be clear -- I  
3 think I was. I want to make sure I'm clear. Any  
4 questions that I ask about Dominic Casey when he  
5 went out to the woods and what he was told and what  
6 he told you-all and all that you're taking the  
7 privilege on; am I right?

8 MR. CONWAY: Yes, sir.

9 BY MR. MITNIK:

10 Q From reading your statement with the -- that  
11 we referred to earlier with the sheriff's office, Mark  
12 Hussy, I saw something in there about that there had been  
13 some disputes over -- and this isn't the exact words,  
14 these are my words -- of Caylee being somewhat attached  
15 to you and your wife and that that may have caused some  
16 level of friction or some disputes with Casey in the  
17 past; is that fair?

18 A I don't ever think that there was a dispute  
19 between Casey and myself or with Cindy about our  
20 affection for our granddaughter. I don't believe there  
21 ever was that at all. I think that was that something  
22 possibly could have been drummed up or someone said  
23 something about it. No.

24 Q Okay.

25 A I mean, my gosh. My granddaughter lived with

1 know that Mr. Casey ever went searching was the woods  
2 where your granddaughter's body was ultimately found?

3 A That's the only one that I know of, yes.

4 Q And as your private investigator, what  
5 information was he relaying to you on a daily basis, if  
6 any, about his search about his findings?

7 MR. CONWAY: That's privileged. It's  
8 information specifically related to the  
9 investigation, so privileged.

10 Q Was he giving you information -- was he  
11 reporting to you on a daily basis?

12 A No, sir, no. I didn't have daily contact with  
13 him, no.

14 Q In the whole time that Mr. Casey was working  
15 for you, did he ever report to you about his search for  
16 Zenaida Gonzalez?

17 A Not specifically, no, not on a daily basis or  
18 anything like that. I think every once in a great while  
19 we would probably talk about maybe --

20 MR. CONWAY: George, just answer it "yes" or  
21 "no," and --

22 A No, not --

23 MR. CONWAY: -- if they want to follow up,  
24 they can follow up.

25 A Not really, no.