

1 Did you notice that in the ad?

2 A. I did.

3 Q. And what did you take that to mean?

4 A. Very offensive.

5 Q. What did you take it to mean?

6 A. Threatening.

7 Q. How? How were you threatened?

8 A. Because of the implication.

9 Q. What would the implication be?

10 A. That the device was used on me. I find that
11 very threatening, obnoxious.

12 Q. You find it obnoxious?

13 A. Outrageous.

14 Q. Okay. That you and your husband would have
15 conjugal relations, you find that outrageous?

16 MR. ENGLANDER: Objection. That's not what she
17 answered.

18 THE DEPONENT: That's none of your business.

19 BY MR. MCGOWAN:

20 Q. I'm trying to find out what is outrageous?

21 A. What is outrageous? That's my private life, and
22 that has nothing to do with anybody at all.

23 Q. Okay. And you think that "Betty FAC" somehow
24 has something to do with your private life?

25 A. I certainly do.

1 Q. Okay. I'm going to show you -- we've got a 6.
2 This is 7.

3 (THEREUPON, Exhibit No. 7 is marked for
4 identification.)

5 MR. ENGLANDER: (Peruses the exhibit.)

6 BY MR. MCGOWAN:

7 Q. This is purportedly some type of a demonstration
8 in Italy, and -- I'm being told something different.

9 This is a demonstration that was in Washington.
10 I'll represent to you that it was. It's exhibit 7. I
11 don't know if you've ever seen this picture before or
12 not.

13 A. (Deponent peruses the exhibit.)

14 MR. ENGLANDER: Is your question you don't know,
15 or is the question has she seen it before?

16 BY MR. MCGOWAN: Question is have you --

17 A. No. I don't think I ever have.

18 Q. Do you find anything offensive of that?

19 A. Totally.

20 Q. What's that?

21 A. The implication of what's on the signs. I
22 consider it very threatening and false.

23 Q. Okay. What's threatening about it?

24 A. Threatening about it because it's lies.

25 Q. All right. So --

1 A. Why would they be threatening us?

2 Q. Where are you being threatened in this?

3 A. The implication is that we're being threatened,
4 sir. That is a form of harassment. It's very
5 terrifying to me because it is false.

6 Q. There's a sign here that says "DFAF BS Must
7 End." Do you believe that that's a double ontography
8 of your initials?

9 A. I do.

10 Q. Let me show you exhibit A8.

11 MR. ENGLANDER: Do you have another 7 for us?

12 MR. MCGOWAN: I don't. But I'll try to get one.
13 I may have one back at the office.

14 (THEREUPON, Exhibit No. 8 is marked for
15 identification.)

16 MR. MCGOWAN: This is 8.

17 BY MR. MCGOWAN:

18 Q. I'll represent to you this is the Uhurus
19 demonstrating out near your house.

20 A. Yes.

21 Q. Do you recall that?

22 A. Yes, I do.

23 Q. Okay. Were you threatened by -- did you feel
24 threatened by that?

25 A. Absolutely.

1 Q. Okay. They've actually committed acts of
2 violence, I think. Haven't they burned things down?

3 A. I wouldn't be surprised.

4 Q. Have you ever heard that they used violence to
5 pursue their agenda?

6 A. I don't know much about the Uhurus. And I have
7 no idea why they would come in front of my house. But
8 I consider it very threatening, very frightening and
9 unacceptable.

10 Q. Did it cause you emotional distress?

11 A. Absolutley. And I'm still emotionally
12 distressed by it.

13 Q. By the Uhurus?

14 A. By the whole thing because this was generated by
15 Richard Bradbury, in my opinion. And I think it's
16 very threatening. I'm very frightened by it. And my
17 family is frightened by it.

18 Q. You think Richard Bradbury has something to do
19 with the Uhurus coming to your house?

20 A. I do.

21 Q. What evidence do you have?

22 A. I don't have hard evidence. But I feel it
23 because it's a pattern of harrassment, stalking, of
24 demonstraighting against me and coming to my home. I
25 feel very threatened. I feel invaded. And I'm very

1 frightened by it.

2 Q. All right. But just to be clear, you feel
3 Richard Bradbury has something to do with the Uhurus
4 doing this?

5 A. I do.

6 Q. But you have no evidence of that?

7 A. I told you. That's the way I feel about it.
8 And I'm very frightened by it.

9 Q. But you have no evidence?

10 A. I said I feel that way.

11 Q. I understand that but you have no evidence?

12 A. I said I feel that way.

13 MR. ENGLANDER: She's answered the question.

14 MR. MCGOWAN: It's a yes or no question.

15 MR. ENGLANDER: You can answer the question.

16 THE DEPONENT: Yes.

17 BY MR. MCGOWAN:

18 Q. Question is do you have evidence?

19 MR. ENGLANDER: Why don't you explain to her
20 what evidence is?

21 BY MR. MCGOWAN:

22 Q. Do you have any document, photograph?

23 A. I do not.

24 Q. Information, even hearsay that Richard Bradbury
25 had something to do with the Uhurus coming out and

1 demonstrating in front of your house?

2 A. Hearsay, yes.

3 Q. What's the hearsay?

4 A. The hearsay was this anti-group that he's
5 conjured up has been in cahoots with the Uhurus. They
6 came to my house together. And I find it very
7 threatening. I'm very frightened by it.

8 Q. Bradbury came with the Uhurus?

9 A. I don't know if he did or not.

10 Q. When you say, "They came to my house together,"
11 what people?

12 A. As far as I know, some of those people came with
13 them.

14 Q. What people?

15 A. Supposedly Straight victims of some sort.

16 Q. There's been a lot in the press lately about
17 demonstrating down in the Bay Walk, anti-war
18 demonstrations. Do you consider that threatening?

19 A. Very.

20 Q. You don't like dissent very much, do you?

21 A. I'm sorry?

22 Q. You don't like dissent very much, do you?

23 A. I don't understand your question.

24 Q. Do you know what dissent is?

25 A. I do.

1 Q. It's like disagreement protected by the first
2 amendment. You find the anti-war demonstrations
3 threatening?

4 A. No, not --

5 Q. At Bay Walk?

6 A. Not in the pure sense, no.

7 Q. So you don't consider those demonstrations a
8 threat at Bay Walk?

9 A. Would you mind defining "threat," to whom?

10 Q. Well, you've been using the word "threat" all
11 morning. Do you find it as a threat to you?

12 A. Not the anti-war people no, not as a direct
13 threat to me.

14 Q. An indirect threat?

15 A. No, not to me directly or indirectly.

16 Q. Okay. You've alleged in your -- let's go back
17 again to the pump. And I'm again going back to
18 Exhibit 3A. It says plainly put, "Mr. Bradbury, it
19 would be our intention to have you become the prey and
20 not the hunter."

21 Did you approve that language when it was put
22 into the letter?

23 A. I don't recall preapproving it. But I do
24 approve it, yes.

25 Q. Do you know what "prey" means, P-R-E-Y?

1 A. Yes, I do.

2 Q. What is it?

3 A. It -- to follow someone.

4 Q. To follow? Not follow and kill?

5 A. No.

6 Q. Okay. In the first paragraph of the July 10th
7 letter, Exhibit 3A, there's a reference to the
8 advertisement in The Times on May 3rd. And the term
9 "medical device" is used in the letter.

10 Do you see that?

11 A. Yes.

12 Q. Okay. To your knowledge, was there anything in
13 writing prior to that letter that Mr. Bradbury
14 generated and called the pump a medical device?

15 A. I can't really answer that totally. But it is a
16 medical device. It is recognized by anybody as such.
17 And advertizing it, would, I would think, confirm that
18 fact that he knew it was a medical device.

19 Q. Okay. My question is did Mr. Bradbury, to your
20 knowledge, ever use the words "medical device"?

21 A. I've never spoken to Mr. Bradbury. I don't know
22 the answer to your question.

23 Q. To your knowledge, was there any document
24 generated by Mr. Bradbury which called the pump a
25 medical device prior to this letter?

1 A. What does the advertisement say? Let's look at
2 the blow up of it.

3 Q. Yeah, the blow up.

4 A. Well, that's a suspicious way of looking at it.

5 Q. What do you mean? I don't understand the
6 answer.

7 A. Well, there wouldn't be any reason for him to
8 try to embarrass us, frighten us and harass us if it
9 was just an ordinary pump, so he knew what it was.

10 Q. But he doesn't use that word, right?

11 A. He didn't have to. He knew what it was, and he
12 knew what he was doing. He was frightening us, and he
13 certainly did.

14 Q. Okay. Why did it frighten you?

15 A. Because he had to obtain it by stalking us,
16 harassing us and coming around our home for ten years.
17 I feel that that was a violation of my rights. I feel
18 that it was a violation of my home. It is very
19 frightening to me. And I am very frightened by it.

20 Q. You brought an action for intentional infliction
21 of emotional distress?

22 A. That's correct.

23 Q. And you say that one of the aspects of that, I
24 would assume, is this fear that you're expressing?

25 A. That's correct.

1 Q. Is that correct?

2 A. Yes.

3 Q. Have you done anything to mitigate this fear?

4 A. Such as?

5 Q. Anything. You've got an injunction?

6 A. Yes.

7 Q. And to your knowledge, has Mr. Bradbury complied
8 with it? Does he stay away as far as you know?

9 A. As far as I know.

10 Q. He's not contacted you for several years since
11 the injunction certainly?

12 A. What is the date of that letter for the money?

13 Q. The money -- July 10th, 2003.

14 A. So your question is what?

15 Q. Since then, he's not, to your knowledge, made
16 any contact?

17 A. No. He has not violated the injunction to my
18 knowledge.

19 Q. To the best of your knowledge, okay. Has that
20 eased your fear?

21 A. Absolutely not.

22 Q. Okay. Have you talked to anybody about this
23 fear?

24 A. Yes, I have.

25 Q. Okay. Who?

1 A. I've talked to my attorney about it.

2 Q. Okay.

3 A. My husband.

4 Q. Okay. Who else?

5 A. My children.

6 Q. Okay. What have you told your children about
7 it; your fear?

8 A. That I thought that they should be very
9 cautious.

10 Q. Like for their own physical safety?

11 A. Yes.

12 Q. Have they taken you -- or have they taken any
13 extraordinary measures: Body guards, alarm systems,
14 anything like that?

15 A. We all have alarm systems, yes.

16 Q. Have you had them all along used as part of --

17 A. Yes, some of them.

18 Q. Okay. Since the exposure of the medical device
19 came about, have you taken additional precautions for
20 your own security?

21 A. Yes.

22 Q. What would that be?

23 A. When I have been informed of a demonstration, I
24 have had people come and watch the demonstrators
25 including police and the sheriff's department.

1 Q. Okay. Have there been demonstrations at your
2 house since July 2003?

3 A. Let's see --

4 Q. There was the Uhurus, I think.

5 A. There was, yes, in 2004.

6 Q. Other than that, have there been any?

7 A. I wouldn't know. I was living in Italy at the
8 time, but I do know of that one.

9 Q. Do you think if whether you were in Italy or
10 here if there had been, somebody would have told you
11 if you had help in the house?

12 MR. ENGLANDER: What's the question?

13 MR. MCGOWAN: I'm trying to determine if she has
14 knowledge of other demonstrations. My question is had
15 there been one, does she think the help in her house
16 would have notified her.

17 MR. ENGLANDER: Other than Exhibit A?

18 MR. MCGOWAN: Yeah, because she said she knows
19 that the Uhurus are out there.

20 MR. ENGLANDER: Exhibit A aren't the Uhurus.

21 BY MR. MCGOWAN:

22 Q. Okay whoever that was, other than that
23 demonstration.

24 A. So what?

25 Q. While you were in Italy, did anybody ever tell