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CIRCUIT COURT OF THE SIXTH JUDICIAL CIRCUIT
STATE OF FLORIDA IN AND FOR PINELLAS COUNTY
PROBATE DIVISION
CASE NO. 90-2908-GD3

IN RE: THE GUARDIANSHIP OF
THERESA MARIE SCHIAVO,

Incapacitated.

MICHAEL SCHIAVO, AS GUARDIAN OF THE
PERSON OF THERESA MARIE SCHIAVO,

Petitioner,

APPEAL
vs.
ROBERT SCHINDLER AND MARY SCHINDLER,

Respondents.

BEFORE: GEORGE W. GREER
Circuit Court Judge

PLACE: Clearwater Courthouse
Clearwater, FL 33756

DATE: January 26, 2000

TIME: 4:00 p.m.

REPORTED BY: Beth Ann Erickson, RPR
Court Reporter
Notary Public

TRIAL

ROBERT A. DEMPSTER & ASSOCIATES
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Volume V Pages 680 - 839

COPY

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1 (THEREUPON, COURT RECESSED AT 5:45 ON 1-26-00
2 AND COMMENCED AGAIN ON 1-27-00 AT 9:00 A.M.)

3 THE BAILIFF: All rise. Circuit court
4 of Pinellas County is back in session.

5 THE COURT: Be seated, please.
6 Ms. Campbell, are you ready to proceed?

7 MS. CAMPBELL: Yes, Your Honor. I would
8 like to call Diane Meyer to the stand, please.

9 THE BAILIFF: Stand right here, please.
10 Face the judge. Raise your right hand to receive
11 the oath.

12 (THEREUPON, THE WITNESS WAS SWORN ON OATH BY
13 THE COURT.)

14 DIRECT EXAMINATION

15 BY MS. CAMPBELL:

16 Q Good morning.

17 A Good morning.

18 Q Please state your full name.

19 A Diane Christine Meyer.

20 Q Where do you live?

21 A I live in Doylestown, Pennsylvania.

22 Q Did you just fly in?

23 A Yes. Yesterday. Late.

24 Q How do you know Terri Schiavo?

25 A Terri and I grew up together. Our

1 parents were friends. Terri and I became
2 friends. We spent holidays and vacations
3 together. Our whole families were friends.

4 Q What is your educational background?

5 A I have a Bachelors Degree in psychology
6 from LaSalle University. I am a practicum short
7 of a Masters Degree in counseling/psychology.

8 Q What is your occupation?

9 A I'm a child welfare social worker.

10 Q Have you ever testified in court before?

11 A Yes.

12 Q What do you do as a child welfare social
13 worker?

14 A Abuse investigations. When a report of
15 abuse comes in to Bucks County, I am one of the
16 investigators that goes out and determines whether
17 it's indicated or unfounded and provides services
18 to families in need in the County of Bucks.
19 Whatever services the family might need.

20 Q How old are you?

21 A Thirty-six.

22 Q Do you know how old Terri Schiavo is?

23 A Thirty-six.

24 Q Can you please describe, when you say
25 you grew up together, describe the activities you

1 did.

2 A Our families would spend holidays
3 together. I remember going up to visit the
4 Schindler's home frequently when I was young. I
5 used to joke with Mrs. Schindler. I was kind of
6 hyperactive. She used to say that when I was
7 coming, hide all the breakables.

8 We would play. My brother, Steven, and
9 Bobby are the same age. They were friends. We
10 went on family vacations every summer together.
11 The Schindlers would go to Stone Harbor and we
12 would go down and visit. We would go to Cape May
13 and they would come and visit us. We took the
14 same weeks together and ended up taking two weeks
15 of summer together.

16 Q Approximately when did this friendship
17 or closeness of the families start?

18 A All growing up we were friends. Terri
19 and I became particularly close right after we
20 graduated high school. That summer.

21 Q Where did you go to high school?

22 A Villages of Marie.

23 Q Was that a Catholic school?

24 A Private Catholic.

25 Q Do you know where Terri went to school?

1 A Archishop Wood.

2 Q Was that close in proximity to you?

3 A Yes.

4 Q Did you belong to the same church?

5 A No.

6 Q What is your religious preference?

7 A Roman Catholic.

8 Q Are you actively practicing?

9 A Yes.

10 Q Do you attend mass regularly?

11 A Yes.

12 Q Have you pretty much growing up your
13 whole childhood?

14 A I'm sorry?

15 Q Have you pretty much had the same
16 practices, religious-wise, growing up?

17 A Yes.

18 Q Did you ever work with Terri?

19 A Yes. We did. We held a couple of
20 summer jobs together. Facelifters Kitchens.
21 Telemarketing.

22 Q How often would you generally see
23 Terri, would you say, after high school?

24 A In the summers, it would be daily. We
25 saw each other every day. I know the summer after

1 high school graduation it was I would be at her
2 house one night and she at mine the next. We were
3 back and forth. Our parents must have split our
4 food bills because we were together so much.

5 Q How often would you speak to each other?

6 A Everyday during the summer. Then I went
7 away to college. I went to Scranton University in
8 September. She stayed home. So I would assume --
9 I came home in the beginning almost every
10 weekend -- I saw her whenever I was home. Then
11 we would talk on the phone, probably weekly, at
12 the very least while I was away. She would come
13 and visit me up in Scranton.

14 Q How would you describe Terri as a young
15 adult?

16 A Terri is one of those people that I
17 always say that you are lucky that you get to
18 know. She is just good. I used to say she was
19 the light side of life. I looked at somebody and
20 would say what an ugly dress. She looked at them
21 and would say, but it looks good on her. I never
22 ever heard her really say anything bad about
23 anyone. She was just good. Funny. Pretty.

24 Q Did you and Terri ever discuss any end
25 of life issues?

1 A There was an incident that happened one
2 summer where I told a poor joke about Karen Ann
3 Quinlan. I remember distinctly because Terri
4 never lost her temper with me. This time she did.
5 She told me that she did not find the joke funny.
6 She did not approve of what was going on or what
7 happened in the Karen Ann Quinlan case.

8 I remember one of the things she said is
9 how did they know she would want this. How did
10 they know she wouldn't want to go on. She was so
11 strong about it. Terri, to take that strong of a
12 stand and say something so strongly and come back
13 at me the way she did, it really embedded in my
14 memory.

15 Q Do you remember what the joke was?

16 A Yes. Do you want me to say it?

17 Q Yes.

18 A I apologize for the joke. It was, "What
19 is the state vegetable of New Jersey?" And the
20 punch line was Karen Ann Quinlan.

21 Q Do you recall when that was?

22 A In trying to go back through my memory,
23 the nearest I can track it was after we graduated
24 high school, I believe it was, because my parents
25 gave me a car and I remember us being in that car.

1 It was the summer of '82.

2 Q Do you recall when the Karen Ann Quinlan
3 case was being discussed in the news?

4 A Now I do. Now I remember it was in the
5 70s. At the time I did not remember, when we
6 originally talked. Now I know it was in the 70s.

7 Q Is there anything that has triggered
8 your memory as from timing as to why this is
9 coming about later?

10 A When I was asked those questions in
11 deposition, I kept saying I wonder why, what
12 brought that joke up. What I remembered was a
13 replay of the telemovie regarding her, Karen Ann
14 Quinlan. I remember watching it in Scranton in my
15 lounge where I was living that year. So it falls
16 in in the time frame, it must have been, that that
17 telemovie resurfaced the joke.

18 Q Do you remember who was featured in the
19 telemovie movie?

20 A I think Brian Keith. She was the
21 daughter of the guy from the Untouchables. I
22 can't remember her name. I remember it was the
23 daughter of the guy from the Untouchables was in
24 it.

25 Q Was this a long period of time of a

1 discussion between you and Terri?

2 A It was -- probably there was not much of
3 a discussion because I did not have much to come
4 back for obviously. Obviously, I was very wrong
5 at telling that joke. In retrospect, it's not a
6 very funny joke. I don't know if it was a
7 discussion. It was more of a dialogue or
8 soliloquy on the part of Terri.

9 Q Did she hold any grudge against you?

10 A No. No. She spoke her mind. That was
11 it. I'm sure we were probably laughing shortly
12 thereafter.

13 Q When was the last time you talked to
14 Terri?

15 A I'm not sure of the year. Let me go
16 back. I think I can go back in memory. Probably
17 in '85 or '86.

18 Q Do you recall what the discussion was
19 about?

20 A Terri and I had met in the parking lot
21 of her church, Our Lady of Good Counsel, to talk
22 about difficulties we were having in our
23 friendship. The discussion was about -- she laid
24 out these things that I had apparently said or
25 done that had hurt her. And again, it was not

1 much of a dialogue because she laid out her
2 husband said I did this or her husband said I was
3 not a good friend for this reason.

4 I had nothing to come back from.
5 Basically, if you are going to believe what is
6 happening, there is nothing I can say.

7 Q Did you ever have any concern about
8 issues for Terri around that time frame?

9 A Yes. I did.

10 Q What were those concerns?

11 A Her eating habits or lack of eating
12 habits. I had stayed with Terri, I guess about a
13 week. A Monday through Friday kind of thing while
14 her husband had gone to training school. I think
15 it was called Ronald McDonald College. I stayed
16 with her.

17 During that period of time that week --
18 they were living in a townhouse or condo they had
19 rented. She had not eaten much at all. As a
20 matter of fact, Friday night Terri and I liked to
21 go to eat Chinese and pig out on Buddha's Delight.

22 I think it was the American Music Awards
23 were on because her mother called during it to
24 sing while Stevie Wonder was singing "I Just
25 Called to Say I love You". Her mother had done

1 that. That is why I remember that. I forced
2 Terri -- was prompting her to eat.

3 When her husband had returned I had,
4 within that week of returning, mentioned to him
5 that I was concerned about her eating. He had
6 said everything was okay. Then time had passed.
7 I'm not sure how much time. And I approached him
8 again, because she still was not eating, and I was
9 told she was fine and to mind my own business.

10 Q Did Terri ever have a weight problem?

11 A Yes. She did growing up. She lost a
12 lot of weight in her senior year in high school
13 through Nurti-System.

14 Q Was she thin at the time you are talking
15 about?

16 A Yes.

17 Q Is there any other insight you can tell
18 the Court, insight to help the Court as to Terri's
19 wishes as to withdrawal of feeding tubes?

20 A I just go back to that conversation that
21 she, for her to express such strong feelings, it
22 just was not her. To come back at me that way as
23 strongly as she did. And I have to believe that
24 she felt very strongly about that.

25 Q Did your -- was Terri close to your

1 grandmother?

2 A My Grandmother Cuter? I think she was.
3 Yeah. She liked my grandmother.

4 Q Did your grandmother also live in the
5 Philadelphia area?

6 A Yes.

7 Q Did she pass away during the time of
8 your and Terri's friendship?

9 A Yes. She did.

10 Q Do you recall Terri ever making any
11 comment to you regarding the circumstances of her
12 death one way or the other?

13 A Not right now.

14 Q What do you believe, you personally
15 believe, are the Catholic beliefs in the
16 withdrawal of life support issues?

17 MR. FELOS: Your Honor, I object, number
18 one, as to relevance as to what this witness
19 believes the Catholic church's position is, and
20 the other as to the competency of the witness to
21 testify as to what the beliefs of the church are.

22 THE COURT: Well, she's a practicing
23 Catholic, so as to the second objection, I'm not
24 sure that is valid. What earthly relevance is her
25 beliefs?

1 MS. CAMPBELL: We've heard testimony
2 before from a priest's level as to what the
3 Catholic beliefs are. There was some discussion
4 in that as to what actual practicing Catholics
5 would believe circumstances would hold. What the
6 church's beliefs would be. I think it would be
7 relevant for this witness as to someone in the
8 same area.

9 THE COURT: Different church, different
10 priest.

11 MS. CAMPBELL: Same religious beliefs.
12 Close friends. I think what her personal beliefs
13 are and what the church's beliefs are are
14 relevant. Not from an academic level, but from
15 her personal level as a practicing Catholic.

16 MR. FELOS: Whatever this witness may
17 believe that the doctrine of the Catholic church
18 is is hers. It would be sheer speculation to
19 infer from that what somebody else may have
20 believed.

21 THE COURT: Well, you know, if you would
22 have asked her, I would have probably allowed it
23 to show possible bias. I'll allow it. We don't
24 have a jury. Please proceed.

25 Q (By Ms. Campbell) Thank you. You may

1 answer the question.

2 A Actually, can you ask it again? I'm not
3 sure.

4 Q What do you believe are the Catholic
5 beliefs in the withdrawal of life support issues?

6 A My understanding of what the Catholic
7 church says is that life is to be protected as
8 long as there is life. That withdrawal of life
9 support is not along the lines of Catholic
10 doctrine.

11 Q Why did you want to come and testify in
12 this trial?

13 A Because it's right. Because it was the
14 right thing to do. And I wanted to speak to what
15 my conversation was with Terri and let the Court
16 hear it.

17 MS. CAMPBELL: Thank you. I have no
18 further questions at this point.

19 THE COURT: Cross-examination?

20 CROSS-EXAMINATION

21 BY MR. FELOS:

22 Q Is it Miss Meyer or Mrs. Meyer? Are
23 you married?

24 A Miss Meyer.

25 Q Are you married, ma'am?

1 A No. I am not.

2 Q Have you ever been married?

3 A No, sir.

4 Q I'm George Felos, attorney for Mr.
5 Schiavo. As I understand your testimony, the
6 thing that strikes you the most about the
7 conversation with Terri about the Karen Ann
8 Quinlan case was her strong reaction?

9 A Um-hmm. Yes, sir.

10 Q Okay. I think you said it's the first
11 time she ever got angry at you?

12 A Yes, sir.

13 Q That is really the primary thing that
14 sticks in your mind? My gosh, what a reaction
15 from Terri when I told that joke?

16 A Yes, sir.

17 Q As I understand it, Terri was a very
18 compassionate person?

19 A Yes, sir.

20 Q Very loving person?

21 A Yes, sir.

22 Q Never wanted to look down on somebody.
23 In fact, you gave an example if you said, hey,
24 it's black, she'd say it's white because she was
25 that type of person and did not want to look at

1 the bad side?

2 A Correct.

3 Q Would you agree that the joke you told
4 is offensive?

5 A Yes, sir.

6 Q Would you agree that even the average
7 person may find that joke offensive?

8 A Yes, sir.

9 Q Would you agree that Terri in
10 particular, being who she was, would find it
11 particularly offensive?

12 A Yes.

13 Q Now would you agree that the joke is
14 offensive whatever one's beliefs may be about
15 withdrawal of life support?

16 A Yes, sir.

17 Q So the fact that an individual, any
18 individual, and especially Terri, would have a
19 strong and hostile reaction to that joke just for
20 the fact that it's being told would not surprise
21 you; would it?

22 A No.

23 Q Now I believe that you mentioned that
24 your -- that Terri's comment was she didn't
25 approve of what the parents are doing?

1 A She did not approve of what happened.
2 What the parents are doing.

3 Q What the parents are doing. Would you
4 agree that in the Karen Ann Quinlan case that what
5 the parents were doing or doing was trying to
6 remove or seeking permission to remove the
7 respirator from Karen Ann Quinlan?

8 A Yes sir.

9 Q Wouldn't you agree that the statement "I
10 don't agree with what the parents are doing,"
11 would make no sense if the parents had already
12 done the act?

13 A I see what you're saying there, but what
14 I'm saying is what I believe Terri was talking
15 about is it was ongoing. That they had removed --
16 they had fought to have it removed by that point,
17 but what you know you are doing, we are doing,
18 it's semantics. It was their position I think she
19 was objecting to.

20 Q Could you repeat that answer again? I
21 didn't quite understand that.

22 A Sure. What I'm saying is what you are
23 talking about is one word. "Are" as opposed to
24 "were". I'm saying, in the course of memory, it
25 is semantics. It was the opinion. What was

1 important to me is what she was expressing in
2 terms to her objection to what their intent was.

3 Q Do you recall that I took your
4 deposition? I didn't, but Mrs. Felos took your
5 deposition?

6 A Yes, sir.

7 Q That was, my gosh, this month. Just a
8 couple weeks ago. January 10, 2000?

9 A Yes, sir.

10 Q You were asked, on Page 37, Line 19,
11 Question. Okay. Let me go back to that
12 one conversation then again. If you can recall.

13 Answer. Um-hmm.

14 Question. And can we assume that the
15 Karen Ann Quinlan case was fairly prominent in the
16 news at that time when you told the joke?

17 Answer. I would assume so. Otherwise
18 the joke by now is old hat. I mean, so I assume
19 it was prominent at that time.

20 Wouldn't it seem logical to you that --

21 A If you read further --

22 Q -- that the case was in the news and
23 prominent at that time?

24 A That was only a part of the deposition,
25 I believe. By the way, I did not receive a copy

1 to, I asked to stipulate to, and I had not
2 received a copy to sign off on. So I'm not sure I
3 can say that, you know, it's accurate.

4 But my memory of the deposition was that
5 I was asked that question on several occasions.
6 On several occasions I answered similarly to that.
7 That I could not state for sure it was in the news
8 at that time, but something had obviously prompted
9 a resurface of the joke.

10 Q Ma'am, I don't believe you said in your
11 deposition something prompted a resurface of the
12 joke, but let's go back to your deposition. I
13 asked on Page 25:

14 Question. I guess the Supreme Court,
15 the court, it was still in the court at that point
16 is your understanding?

17 Answer. I honestly don't remember at
18 that time. I assume by remembering her statement
19 it was or just had recently been.

20 After your deposition two weeks ago,
21 from that, from the time of your deposition to
22 your testimony today --

23 A Um-hmm.

24 Q -- have you spoken with anyone about
25 your testimony or about this case?

1 A Yes, sir.

2 Q Okay. Who have you spoken with?

3 A I have spoken with -- I'm sorry. Ms.
4 Campbell. And I have spoken with my father.
5 That's pretty much it.

6 Q Um-hmm.

7 A I told work about why I was coming, but
8 not what the content was.

9 Q Did you speak with any of the
10 Schindlers?

11 A I have spoken with the Schindlers, but
12 not directly about testimony.

13 Q Well, has someone told you, between the
14 date of the deposition and the date of your
15 testimony today, you know, gee, the Karen Ann
16 Quinlan case occurred in 1975 and 1976?

17 A No, sir. The deposition prompted me
18 because I was pressed within it and was not able
19 to answer it, prompted me to go back and look.

20 Q When did you talk to Ms. Campbell?

21 A I talked with her -- I talked with her
22 several times this week because --

23 Q Is it your testimony that Ms. Campbell
24 didn't mention to you anything about the fact that
25 we had newspaper articles about the Karen Ann

1 Quinlan case which showed the dates were in 1975
2 or 1976?

3 A No, sir. She did not.

4 Q And --

5 A I mentioned to Ms. Campbell that in my
6 deposition I had difficulty remembering when the
7 Karen Ann Quinlan situation was. I felt you were
8 going for that in the deposition, to be perfectly
9 honest. So I went back, and it was in going back
10 that I realized what had probably prompted it was
11 I remembered seeing the telemovie.

12 Q I'm not saying there is anything wrong
13 with Ms. Campbell telling you about this.

14 A I'm saying it did not happen.

15 Q It's a little hard for -- please. It's
16 a little hard for me to believe that as good an
17 attorney as she is she would not say to a witness
18 we have some evidence now showing when the case
19 was, does that jog your recollection. Did that
20 help you understand the dates. I mean, Ms.
21 Campbell never mentioned anything like that to
22 you?

23 A I had talked to her about it prior to
24 that.

25 Q What did you tell Ms. Campbell about it?

1 A I told Ms. Campbell that, as I said to
2 you in the deposition, when we were talking in the
3 deposition -- actually, I was talking to I assume
4 your wife -- that I felt that they were
5 questioning very strongly on the dates. I was
6 weak on that because I didn't know it.

7 So I went back to find out when the
8 Karen Ann Quinlan thing had happened and
9 remembered seeing -- because I could not remember
10 what prompted the joke -- and remembered seeing
11 the telemovie.

12 Q The statement of Terri was she didn't
13 approve of what Karen Ann Quinlan's parents were
14 doing? Not had done, but were doing?

15 A I remember her saying were doing or are
16 doing.

17 Q You remember her saying what the parents
18 are doing?

19 A Um-hmm.

20 Q Did she elaborate anymore about what it
21 was particularly that she had a problem with?

22 A What she had talked about was that, and
23 what I remember specifically was her talking about
24 how did they know what she feels. How did they
25 know. And saying, you know, going on and on about

1 what she felt, meaning Karen Ann, how her parents
2 could make that choice for her.

3 Q In your deposition on Page 23 --

4 A Um-hmm.

5 Q -- you made the statement -- these were
6 your words about what Terri said to you about why
7 she didn't approve of what the parents were
8 doing.

9 How do they know that she wants this?
10 She may be there and want to continue living.

11 A Um-hmm.

12 Q Well, let's take a look at it. Is that
13 your testimony now as to what Terri told you?

14 A Yes. That is what I remember.

15 Q How do her parents know that she wants
16 this, would you agree that that's a question of
17 Karen Ann Quinlan's intent?

18 A Yes, sir.

19 Q So Terri, is it fair to say Terri was
20 saying, well, maybe it's not good for the parents
21 to do this if they don't know what Terri -- if
22 they don't know what Karen Ann Quinlan wants? If
23 they don't know what her intent is?

24 A Correct. But the second statement --

25 Q Well, let me --

1 A Um-hmm.

2 Q So couldn't one reasonably conclude in
3 that statement that if Terri was aware or knew
4 that Karen Ann Quinlan's parents knew that this is
5 what their daughter wanted she may have had a
6 different reaction?

7 A Possibly. That's me making an
8 assumption as to what she would have done.

9 Q But you do agree that one question, that
10 area of concern that Terri had was, gee, do the
11 parents know what Karen Ann Quinlan wanted? How
12 do they know what she wants?

13 A Yes.

14 Q Okay. Because that is what you said she
15 said. How do they know what she wants.

16 A Um-hmm.

17 Q There is a second part to what you said
18 Terri told you. She may be there and want to
19 continue living.

20 A Um-hmm.

21 Q Well, the second part, she may want to
22 continue living, also goes to the question of what
23 Karen Ann Quinlan's intent was; wouldn't you
24 agree?

25 A Yes.

1 Q Terri seems to be sharing that if it's
2 Karen Ann Quinlan's intent to want to remain alive
3 that she thinks that Karen Ann Quinlan should
4 remain alive; is that a fair statement?

5 A Yes.

6 Q The statement that you claim Terri made
7 "she may be there" --

8 A Um-hmm.

9 Q -- what did you take that to mean?
10 Anything in particular?

11 A It meant that there may have been some
12 -- at the time I believe, and in retrospect what I
13 interpreted that to mean is Karen's apparent will
14 to live, whatever it is that makes a person a
15 person, was there.

16 Q Would you agree with me when Terri
17 allegedly said "she may be there" is that she is
18 saying, gee, if Karen Ann Quinlan has
19 consciousness, awareness, she may want to live?

20 A Yes. Well --

21 Q Can we equally assume from that that if
22 in fact Karen Ann Quinlan had no consciousness and
23 was truly unconscious that Terri may not have had
24 an objection or reaction?

25 A No. Because what I took the

1 consciousness to mean was not that. Not
2 consciousness in terms of that there was something
3 there. That Karen was there and that we couldn't
4 make that judgment as to whether or not --

5 Q Terri does not say that. She just
6 said --

7 A You are asking me for what I assume
8 Terri meant. That is what I assumed Terri meant.

9 Q But she said she may be there --

10 A Right. And you asked me --

11 Q -- and want to continue living?

12 A Correct.

13 Q If someone has no consciousness, can
14 they form an intent as to what they want?

15 A I don't know the answer to that. I
16 don't know that anybody truly does. Especially in
17 these states.

18 Q Explain to me, please, how if there is
19 no consciousness or awareness how someone can take
20 the volitional act of making a decision as to what
21 they want?

22 A What I'm saying and what you have been
23 asking me is to assume what Terri was intending by
24 her statement.

25 Q That is not my question. My question

1 was explain to me how someone without
2 consciousness can take the volitional act as to
3 making a decision as to what they want?

4 A I don't know.

5 Q Would you agree that that can't be done?

6 A I don't know. Because I don't know
7 enough about level of consciousness.

8 Q Now your parents, especially your
9 father, is a really good friend of Mr.
10 Schindler's; isn't he?

11 A Yes.

12 Q They had a close relationship while they
13 were living in Philadelphia?

14 A Yes.

15 Q You testified that the families are very
16 close together?

17 A Yes.

18 Q You're close -- in fact, your father
19 came with you on this trip; didn't he?

20 A Yes, sir.

21 Q Your friendship with Terri really jelled
22 your senior year of high school; didn't it?

23 A Toward the end. Yes.

24 Q In fact, Terri was probably your closest
25 friend?

1 A Yes.

2 Q And would you say she was your closest
3 friend until the breakup of the relationship in
4 1986?

5 A Yes.

6 Q That relationship was very important to
7 you?

8 A Yes.

9 Q And can I assume that it must have been
10 a really harsh or bad breakup because you did not
11 talk to her since 1986?

12 A It was not harsh. It was painful.

13 Q It was painful to you?

14 A Um-hmm.

15 Q And is it true that you blame
16 Mr. Schiavo --

17 A No. It's not true.

18 Q -- for the breakup of that relationship?

19 A No. It is not true.

20 Q You don't blame him?

21 A No. Terri was an adult. Terri made her
22 own choices.

23 Q Well, you related to us that the
24 supposed reasons that Terri was giving you for
25 breaking up the relationship were lies about you

1 that Michael told her?

2 A That is what Terri relayed to me. Yes.
3 Well, the things that she had said were statements
4 her husband had told her. Yes.

5 Q Did you believe Terri was telling you
6 the truth?

7 A Yes. I did.

8 Q So in essence you believed at the time
9 that Mr. Schiavo had lied to Terri about things
10 that you did?

11 A Yes.

12 Q You believed at the time that that was
13 the cause for Terri turning on you or ending the
14 relationship?

15 A I wouldn't say the cause. I would say
16 that is what prompted Terri to make her choices.
17 But Terri made her own choices. She was an adult
18 and she made her own choices.

19 Q You didn't go to the same school as
20 Terri?

21 A No, sir.

22 Q You talked about being with Terri while
23 Michael was training at McDonald's.

24 A Um-hmm.

25 Q Is it fair to say that you were

1 disturbed by Terri's eating habits?

2 A Yes, sir. May I have a glass of water?

3 (THEREUPON, THERE WAS A BRIEF PAUSE IN THE
4 TESTIMONY.)

5 Q (By Mr. Felos) I think we were talking
6 about Terri's eating habits.

7 A Yes.

8 Q When your friendship jelled in high
9 school, were the two of you about the same weight?

10 A No. Terri had actually probably just
11 lost a lot of the weight. I was overweight, but
12 Terri was thin.

13 Q At the time of Terri's marriage, would
14 you say she was -- what would you say Terri
15 weighed at the time of her marriage?

16 A I have no idea, but I think she might
17 have been -- I go by size. I think probably
18 around a size 10, 12.

19 Q Would you say the two of you were about
20 the same weight at the time she was married?

21 A No. No. I was much heavier.

22 Q So Terri, as time went on, continued to
23 lose more weight?

24 A Yes, sir.

25 Q She was becoming thinner. By the way,

1 how soon after the time you noticed that you
2 believed that Terri had some sort of eating
3 problem, how soon afterward was the breakup of the
4 relationship?

5 A To be honest with you, I'm not sure. I
6 first, like I said, the first time that it became,
7 I became aware of it is when I stayed with her for
8 that week. That was, I believe they were married
9 a short period of time at that point.

10 I'm not sure, but they were still living
11 in the condo or the townhouse. Then they had
12 moved. So there was a period of time. Because
13 they had moved to her parent's basement and were
14 living there before our relationship ended.

15 Q Are you angry at Mr. Schiavo now?

16 A As I said in my deposition, yes, for
17 what I believed he knew and took no action on.

18 Q Okay. So to this day. So you last
19 spoke with Terri in 1986?

20 A Yes.

21 Q Sometime before you spent some time and
22 you noticed that she was not eating the way you
23 thought she should?

24 A No. I noticed she was not eating --

25 Q -- and decades later you are still angry

1 at Mr. Schiavo?

2 A Yes. I'm also angry at myself.

3 MR. FELOS: Just one moment more,
4 Your Honor.

5 THE COURT: Yes sir.

6 Q (By Mr. Felos) Does the loss of your
7 friendship with Terri still cause you pain or
8 grief?

9 A I wouldn't say grief. The loss of
10 Terri's friendship is a sad part of my life, but I
11 have gone on and made other friends and I still
12 remember Terri very fondly.

13 MR. FELOS: I have no other questions.

14 THE COURT: Redirect?

15 REDIRECT EXAMINATION

16 BY MS. CAMPBELL:

17 Q Were you in Michael and Terri's
18 wedding?

19 A Yes.

20 Q How would you describe the closeness of
21 your relationship at the time of the wedding?

22 A Very close. We spent a lot of time
23 together. We actually, the morning of her
24 wedding, her sister, myself, and Terri all went to
25 the hairdresser together. Terri and I had the