

1 for one of the defendants, I think.

2 Q. Do you have any recollection of Sue getting a night vision
3 camera and taking pictures of Pam Broussard at her place of
4 employment, in connection with that deposition?

5 A. Yeah.

6 Q. What was Pam Broussard doing for a living?

7 A. I think she was a dancer at this bar out there on the
8 Abbeville Highway, just south of Maurice.

9 Q. She was dancing as a stripper?

10 A. Yeah.

11 Q. Was that of some assistance to you in taking the wind out
12 of that litigation?

13 A. Well, you know, it gave me an outline of questions to ask
14 at the deposition, and that was an interesting set of
15 depositions, her and her mother.

16 Q. In any of the civil cases, did you prepare a pauper
17 declaration for Mr. Bell?

18 A. I think so.

19 Q. You were under the impression, therefore, that he had
20 transferred all of his assets?

21 A. Yeah, effectively. I mean, I knew there was some -- he
22 still had title to the house that had a mortgage on it in favor
23 of Sue. I knew she was holding some cash for him. I mean, I
24 didn't know if they had any written arrangement or whatever,
25 but, I mean, essentially all his real estate had been donated