

## Testimony of Paige Campbell

DIRECT EXAMINATION

22

23 BY MR. TOBY L. SHOOK:

24 Q. Could you state your name, please, and  
25 spell your last name for the Court Reporter.  
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1 A. Allison Paige Campbell,

2 C-A-M-P-B-E-L-L.

3 Q. And how are you employed?

4 A. I'm a registered nurse at Baylor and  
5 I'm in Dallas.

6 Q. Okay. And could you tell the jury  
7 your educational and professional training that you have  
8 for the position that you hold.

9 A. I have two degrees. My first degree  
10 from Texas Tech in Zoology. My second degree I got at  
11 UTA, and I have a Bachelor of Science in nursing.

12 Q. How long have you been at Baylor?

13 A. Two years in February.

14 Q. Okay. And what part of Baylor are you  
15 assigned?

16 A. Well, I'm with ICU and just a  
17 neurosurgical trauma.

18 Q. And what are your duties there?

19 A. To put it in a nutshell, I monitor  
20 patients, critically ill patients. And that sounds like  
21 a small thing, but they're changing constantly. So we  
22 monitor them, make sure they are hemodynamically stable,  
23 and kind of coordinate the family and doctors. That's  
24 kind of it in a nutshell.

25 Q. Okay. Let me ask you if you came on  
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1 duty on June 6th, 1996?

2 A. Um-hum. (Witness nodding head  
3 affirmatively).

4 Q. What time were you working that day?

5 A. I came on at 6:45 in the P.M., in the  
6 afternoon.

7 Q. Okay. And was Darlie Routier one of  
8 the patients there in your wing?

9 A. Yes.

10 Q. Okay.

11 A. She was.

12 Q. In fact, were you assigned as her

13 nurse for sometime during the evening?

14 A. Yes.

15 Q. How long were you her nurse?

16 A. For four hours.

17 Q. Do you see Mrs. Routier here in the  
18 courtroom today?

19 A. Yes.

20 Q. Okay. Would you point her out,  
21 please.

22 A. She's over there. Right there.

23 Q. Seated here at the end of the table?

24 A. Right.

25

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1 MR. TOBY L. SHOOK: Your Honor, if the  
2 record could reflect the witness has identified the  
3 defendant.

4 THE COURT: Yes, sir.

5

6 BY MR. TOBY L. SHOOK:

7 Q. And what time did you first meet Mrs.  
8 Routier?

9 A. I would say I took reports at 6:45,  
10 and I met her, I would say, 7:00.

11 Q. And what was her -- how was she when  
12 you took over?

13 A. She was calmly laying in bed. She was  
14 laying in bed. No complaints.

15 Q. Okay. Not in critical condition, was  
16 she?

17 A. I wouldn't say she was in critical  
18 condition, no.

19 Q. Okay.

20 A. She was stable.

21 Q. Okay. And did you tend to her through  
22 the night?

23 A. Yes, I did.

24 Q. Were there other people in the room  
25 with her?

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1 A. There was friends in the room with her  
2 when I was there.

3 Q. How long were they in there?

4 A. I would say until about 9:00, 9:30.

5 Q. Okay. And did you speak to her?

6 A. Yes, I spoke to her.

7 Q. Okay. Did she seem to be alert and  
8 lucid?

9 A. Yes.

10 Q. Know what was going on?

11 A. Yes.

12 Q. Okay. Did you ask her about what  
13 happened, or did that ever come up?

14 A. Yes. I asked her about what happened.

15 Q. Okay. What did -- what do you recall  
16 her telling you about it?

17 A. The main thing that stands out in my  
18 head from what she said was that a man was over her and  
19 trying to stab her.

20 Q. Okay. At some time during the night,  
21 did you ever look at her left hand and examine some  
22 injuries there?

23 A. Yes.

24 Q. Okay. How did that come up? Do you  
25 remember?

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1 A. I noticed some cuts on her left hand,  
2 and I said, "What is this from?" And she said, "This is  
3 where I tried to grab the knife." Something like that.

4 Q. Okay. Now, could you describe the  
5 cuts?

6 A. I can -- they looked like paper cuts  
7 to me. They were scabbed over and just right on the  
8 surface, not oozing, or there was no redness around them  
9 or anything.

10 Q. Not serious at all?

11 A. No.

12 Q. Let me show you what's been marked as  
13 State's Exhibit 28-D. Do you see the type of injuries  
14 you're talking about?

15 A. Yes.

16 Q. Point them out to us.

17 A. Right there and there.

18 Q. Okay. Right along the fingers there?

19 A. Right.

20 Q. Okay. Were you also present when a  
21 pelvic exam was done by some doctors?

22 A. Yes.

23 Q. Okay. And did she make any statements  
24 about what happened during that exam?

25 A. All I remember -- the thing that  
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1 stands out in my mind during that time was that she --  
2 the doctors asked if she could identify the man and she  
3 said, "No, I never saw his face."  
4 Q. Never saw his face?  
5 A. Um-hum. (Witness nodding head  
6 affirmatively).  
7 Q. Okay. Did you make notes throughout  
8 the evening, whether Mrs. Routier was crying?  
9 A. Yes. At the first of my assessment I  
10 made some notes.  
11 Q. Okay. And could you describe how she  
12 was crying to the jury, please?  
13 A. She was whining. She was saying "My  
14 babies. My babies." And I never saw a tear run down her  
15 face. I never saw anything like that. She never asked  
16 for a Kleenex. I never felt the need to offer her a  
17 Kleenex. She was just whining.  
18 Q. Okay. Said the same thing?  
19 A. "My babies."  
20 Q. "My babies."  
21 A. "My babies."  
22 Q. Okay. Did she make any other  
23 statements -- well, let me ask you this: Did you try to  
24 get some of the people out of the room from her?  
25 A. Well, in consideration of what had  
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1 just happened earlier that day, I said, "Okay. You know,  
2 I will be the bad guy here. If you need -- whenever you  
3 want to be alone, if you need me to get these people out,  
4 I will get them out. I'll kick everybody out."  
5 And she said, she goes, "I just need a  
6 lot of friends and family here in this difficult time."  
7 Q. Okay. Is that how she said it?  
8 A. Yeah. I mean, just --  
9 Q. In that same tone of voice?  
10 A. No.  
11 Q. Okay. What kind of tone of voice was  
12 it?  
13 A. Well, she just, "I just need a lot of  
14 friends and family here during this difficult time."  
15 Q. Was she crying at all?  
16 A. No.  
17 Q. When she said that?  
18 A. No.  
19 Q. Okay. Now, later on in the evening,  
20 did you bathe her?  
21 A. I helped Denise bathe her.  
22 Q. Okay. Who was there with you when

23 that --

24 A. Denise.

25 Q. Is she another nurse?

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1 A. She is another nurse, yes.

2 Q. About what time did that take place?

3 A. I think probably around one.

4 Q. Okay. And did Mrs. Routier have some  
5 blood on her?

6 A. Yeah. She had a little bit of blood  
7 -- she had a little bit of blood on her forearm.

8 Q. Okay. And did you wash that off at  
9 that time?

10 A. Yeah, I washed it off.

11 Q. Did you also wash her feet?

12 A. Yeah. I washed her feet off earlier.

13 Q. What time did that take place?

14 A. That happened probably around 8:00,  
15 because her feet were covered in blood and that caught my  
16 attention, and so I washed that off, after I assessed  
17 her.

18 Q. Okay. Did you notice any cuts on her  
19 feet anywhere when you washed her feet off?

20 A. No, I asked her about it. And, you  
21 know, I asked her, "Did you get cut here? Is that where  
22 all this blood is from?"

23 And she said, "No."

24 And then I inspected her feet and  
25 there were no cuts.

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1 Q. Okay. When you helped bathe her  
2 later, was her arm bathed?

3 A. The part that wasn't dressed.

4 Q. Okay. And when you bathed the part  
5 that wasn't dressed, did you have to move it around?

6 A. Yes.

7 Q. Okay. Did Mrs. Routier ever complain  
8 of any pain to her arm when you were moving it around?

9 A. No.

10 Q. Specifically, I'm talking about her  
11 right arm.

12 A. Right. Um-hum. (Witness nodding head  
13 affirmatively).

14 Q. Never complained of pain?

15 A. No.

16 Q. Okay. And during the four hours you

17 had her, did you examine her and take careful note of her  
18 medical condition?

19 A. Yes.

20 Q. Is that one of your duties as a nurse?

21 A. Yes.

22 Q. Okay. Let me show you some photos

23 that have been marked State's Exhibits 52-C and 52-B. Do

24 those photos show some bruising, extensive bruising to

25 the right arm; is that right?

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1 A. Yes.

2 Q. Okay. Did you see any evidence of

3 that injury for the four hours you had her, in the

4 evening hours?

5 A. No, I did not.

6 Q. Okay. That's pretty extensive

7 bruising; is it not?

8 A. Yes.

9

10 MR. RICHARD C. MOSTY: Objection.

11 Leading.

12 THE COURT: Sustained. Let's phrase

13 the question the right way.

14

15 BY MR. TOBY L. SHOOK:

16 Q. Well, could you describe the bruise

17 that you see there in those photos?

18 A. It's an -- it's a long bruise covering

19 most of her arm. One that looks like, because it's

20 purple, it's purple coloring, it looks like it could have

21 happened recently. It looks like one that I might see

22 after a blunt trauma to the chest, after a person has

23 come in right from the ER.

24 Q. It's the type of things that you see

25 when a person comes up that has been in a car accident;

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1 is that right?

2

3 MR. DOUGLAS MULDER: Object to

4 leading.

5 THE COURT: Well, I think we're

6 talking about blunt trauma. Go ahead and answer it if

7 you know.

8 THE WITNESS: Could you repeat it?

9

10

11 BY MR. TOBY L. SHOOK:

12 Q. What type of trauma causes that type  
13 of bruising?

14

15 MR. DOUGLAS MULDER: Judge, that's  
16 been asked and answered. She said she would expect that  
17 when somebody had blunt trauma to the chest and they came  
18 from the emergency room.

19 THE COURT: Thank you. I'll let her  
20 answer that question. Go ahead.

21 THE WITNESS: The type of bruising  
22 that I see here, is the same type of bruising that I see  
23 from blunt traumas.

24

25

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1 BY MR. TOBY L. SHOOK:

2 Q. Okay. And what's blunt traumas?

3 A. Like a hard blow to a part of the  
4 body.

5 Q. Okay. Did you see any evidence of  
6 that injury on her right arm in any of the four hours  
7 when you were with her?

8 A. No.

9 Q. Okay. What time did the next nurse  
10 take over for you?

11 A. 11:00 o'clock.

12 Q. Did you stay on duty at that time?

13 A. Yes.

14 Q. What did your duties switch to at that  
15 time?

16 A. I became charge nurse, and then I gave  
17 the reports to the next nurse, Denise.

18 Q. Okay.

19

20 MR. TOBY L. SHOOK: Okay. That's all  
21 the questions I have for her, Judge.

22 THE COURT: Mr. Mosty.

23

24

25

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1 CROSS EXAMINATION

2

3 BY MR. RICHARD MOSTY:

4 Q. Mrs. Campbell, then you were in Mrs.

5 Routier's presence from maybe 6:45 to 11:00?

6 A. Right.

7 Q. And I guess you were doing your -- did

8 you have another patient?

9 A. No.

10 Q. You were doing your ordinary book work

11 and paperwork and making your notations and doing your

12 other responsibilities?

13 A. Um-hum. (Witness nodding head

14 affirmatively). Yes.

15 Q. And when you came on, there was family

16 there?

17 A. No, there was friends there.

18 Q. Friends there?

19 A. Yeah.

20 Q. And they were there until you went off

21 or not?

22 A. No, they were there until about 9:30.

23 I went off at 11:00 o'clock.

24 Q. Okay. So, the first hour and 45

25 minutes, 2 hours, there were friends -- was it just

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1 friends or was it family or both?

2 A. Well, most of the times it was

3 friends. I believe her mother came in for a few minutes

4 at the very end.

5 Q. And they were consoling each other

6 there?

7 A. Right.

8 Q. Amongst each other?

9 A. Right.

10 Q. And Mrs. Routier had pictures of her

11 children?

12 A. Um-hum. (Witness nodding head

13 affirmatively).

14 Q. And she was grieving over her

15 children?

16 A. Yeah.

17 Q. "My babies. My babies"?

18 A. Saying "My babies."

19 Q. That's a kind of denial, isn't it?

20 Maybe as if my babies aren't dead or missing them.

21 A. Well, I don't know what it is. That's

22 just what I heard her say.

23 Q. Okay. And, you have seen any number

24 of people react differently to different events, haven't

25 you?



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1 A. Yes.

2 Q. I mean, people react differently,  
3 don't they?

4 A. People react differently, but there's  
5 kind of a commonality when someone experiences a major,  
6 or -- when I see a family member watch another family  
7 member die, there is just kind of a commonality.

8 Q. So you think all people who see a  
9 family member die react the same way?

10 A. I didn't say that, no.

11 Q. Okay. That wouldn't be a true  
12 statement, would it?

13 A. No, I didn't say that.

14 Q. We all react differently to the same  
15 events, don't we?

16 A. Yeah.

17 Q. And as a matter of fact, one of the  
18 most traumatic and stressful things that a person can  
19 endure, is the loss of someone close to them; isn't it?

20 A. Sure.

21 Q. And particularly if they see that.

22 Right?

23 A. I would say so.

24 Q. And it can absolutely just put them  
25 right into a funk, can't it?

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1 A. Yeah, it can.

2 Q. And part of -- you have at least some  
3 psychological and psychiatric training as a nurse, don't  
4 you?

5 A. Not really, I mean --

6 Q. You don't get some of that in nursing  
7 school?

8 A. We learn how -- we don't -- we learn  
9 how to listen.

10 Q. Okay.

11 A. And --

12 Q. So, really you don't feel like you're  
13 qualified to judge psychologically how someone ought to  
14 be reacting?

15 A. I'm just talking to you from my  
16 experiences.

17 Q. Okay. And there might be situations  
18 where somebody is in a very stressful effect -- have you  
19 heard of, for instance, combat stress? Post traumatic

20 stress disorder?

21 A. Yeah.

22 Q. Those kinds of things?

23 A. Yes.

24 Q. Can cause depression?

25 A. Yes.

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1 Q. Right?

2 A. Yes.

3 Q. And you know a depressed person has a

4 flat -- what's called a flat affect? You know that from  
5 your training, don't you?

6 A. Yeah.

7 Q. And if someone is reacting in the

8 stupor of a stressful event, they might have a flat  
9 affect?

10 A. Yes. They might.

11 Q. Okay. So -- and the point of that

12 is -- do you have brothers and sisters?

13 A. Yeah, I have a brother.

14 Q. Okay. Are y'all different?

15 A. Are we different?

16 Q. Right. Personality-wise?

17 A. Well, we're different people.

18 Q. Right.

19 A. But we have different personalities.

20 Q. Well, you react different to things

21 than he does?

22 A. Because we're different people, yes.

23 Q. And you react different than other

24 nurses do to things?

25 A. Yeah.

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1 Q. For instance, one nurse might get up

2 there on the witness stand and have tears in her eyes as  
3 she testified. Right?

4 A. I haven't seen any other nurses.

5 Q. So do you think that would be unusual

6 for a nurse to do that?

7 A. I'm not in a -- I mean, it's fine if

8 they do. I mean --

9 Q. Well, some might, some might not.

10 Right?

11 A. Right.

12 Q. Okay. Sort of, that's sort of how I

13 feel and how I react, and what my emotions are in life,

14 are unique to me, aren't they?

15 A. Right.

16 Q. And nobody -- there is nobody in the

17 world that would react to the same event the way I would?

18 A. No, I mean --

19 Q. Because of my upbringing, of my age,

20 of my sex, of my ethnic background, all of those things.

21 A. All I was saying though, I really

22 wasn't saying that. I was just saying there is

23 commonalities, and that's why it stood out in my head.

24 Q. Okay. But you aren't saying one thing

25 is usual, or unusual, or proper or improper, are you?

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1 A. Well, all I'm saying is that it stood

2 out in my head because I haven't seen this in the past.

3 I haven't seen the way she reacted in the past.

4 Q. All right. Well, you have no clue as

5 to what her background is, do you?

6 A. No, I didn't.

7 Q. How she was brought up?

8 A. No. I have no clue to anyone's

9 background that I take care of.

10 Q. You don't have any idea what her life

11 experiences have been?

12 A. No.

13 Q. Right?

14 A. No.

15 Q. How she has typically reacted to

16 events in the past?

17 A. No.

18 Q. And so you have no basis whatsoever to

19 decide what her past behavior was and what her current

20 behavior ought to be?

21 A. That's not even what I was saying

22 though.

23 Q. Okay. That's exactly what -- you

24 weren't saying any of that, were you?

25 A. No. All I'm saying is there's

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1 commonalities that I see in people grieving.

2 Q. And you aren't here at all to pass

3 judgment on how someone ought to react in a stressful

4 situation?

5 A. I didn't say anything about should or

6 shouldn't.

7 Q. Okay. Good. I just want to make sure

8 that we're all on the same page, no pun intended by that.

9 Now, in your notes, you didn't

10 describe her as "tearful," did you?

11 A. I described her as tearful.

12 Q. As "very tearful," didn't you?

13 A. Yes. I described her as tearful.

14 Q. Well, no, actually it was "very

15 tearful," wasn't it?

16 A. Yes. I did in my notes.

17 Q. More so than tearful. I mean, there

18 is a reason for putting the word "very" there, wasn't

19 there?

20 A. She was whining, "My babies. My

21 babies."

22 Q. Well, your words. But these notes are

23 important notes, aren't they?

24 A. Yeah.

25 Q. I mean, that's the -- these notes can

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1 have life and death implications if they're not accurate,

2 can't they?

3 A. Well --

4 Q. I'm not saying in this case, but these

5 focus notes are that important, aren't they?

6 A. The purpose of the focus notes is to

7 have a way of communicating to the next nurse, you know,

8 it's a way of continuity of care.

9 Q. And so that everyone knows as

10 accurately as possible what that patient's history is

11 when they walk in and take over that patient?

12 A. Yes.

13 Q. Okay. And so, you don't put words

14 down here, that you don't want that next nurse to rely

15 on. Right?

16 A. Right.

17 Q. You know she is going to, as a matter

18 of fact, don't you?

19 A. But the next nurse is also going to do

20 an assessment of her.

21 Q. Sure.

22 A. I mean she shouldn't rely just on the

23 notes.

24 Q. No. No. And I would never suggest

25 that she should. But the point is, is that when you make

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1 that note, you know that that patient's care -- that the  
2 next nurse is going to take that note, and then, of  
3 course, she is going to take that and she's going to plug  
4 that into her own observation, and she's going to make  
5 notes to the next nurse. Right?

6 A. She will probably do her assessment

7 first and then read the notes.

8 Q. Okay. And then she will look for is

9 my assessment consistent with the last one, or have we  
10 got some change here. Is there something I need to be  
11 worried about or something going on with this patient  
12 here?

13 A. That's what I do, yes.

14 Q. Okay. So you think it's very

15 important that you -- that you accurately portray what is  
16 happening for that next nurse?

17 A. Right.

18 Q. Okay. And you chose the words "very

19 tearful," didn't you?

20 A. The reason why I chose the words "very

21 tearful," is because I saw her whining.

22 Q. Okay.

23 A. And if I say, "Whining a lot," and

24 this very important document, like you say, I mean, that  
25 gives a negative connotation to the patient.

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1 Q. And you didn't want to do that?

2 A. And it was for a lack of better words.

3 Q. Okay. But you didn't just put

4 moderately tearful, sometimes tearful?

5 A. She was --

6 Q. -- very tearful?

7 A. -- whining a lot.

8 Q. Okay. "Very tearful" is the phrase

9 you used. Right?

10 A. That is the phrase I used, yes.

11

12 THE COURT: Okay. Let's settle down.

13 Let's go on to the next question. Very tearful. Okay.

14

15 BY MR. RICHARD MOSTY:

16 Q. One of the things that you said was,

17 that you asked her about did she want to be alone? Did I  
18 remember that right?

19 A. I just said, "You let me know when you

20 want these people to leave, and I'll be the bad guy and I

21 will get them to leave."

22 Q. Because the fact is that people who

23 are in a stressful situation sometimes want to be alone?

24 A. Right.

25 Q. Sometimes they want people with them?

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1 A. Right.

2 Q. Their emotions are going, maybe, like

3 a roller coaster. Right?

4 A. Right.

5 Q. And you recognize that?

6 A. Right.

7 Q. And you're sensitive to it. And you

8 want the patient to cope with that situation in the way

9 the patient is comfortable with, don't you?

10 A. That's right.

11 Q. I mean, you don't want that patient to

12 cope with it in the way that Ms. Campbell would cope with

13 it, do you?

14 A. I just wanted her to let me know if

15 she wanted them to leave.

16 Q. And you didn't want, for instance,

17 another person imposing their will on her of how she

18 ought to be handling this, did you?

19 A. I really just thought of it as, if you

20 want me to -- if you want these people to leave, I'll

21 tell them to leave.

22 Q. If you want to work through it by

23 yourself, that's fine. If you want to work through it

24 with people around you, that's fine, whichever you want

25 to do?

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1 A. I didn't say that. I said, "If you

2 would like for these people to leave, I will tell them to

3 leave."

4 Q. That's the same thing, isn't it?

5 A. You don't have to worry about being --

6 worry about offending someone. I'll tell them to leave.

7 Q. Well, that's the same thing, isn't it?

8 Let her work through it however she thought it was

9 appropriate?

10 A. Not really. I mean, it was a lot

11 simpler than that. It was just, "If you want these

12 people to leave, I'll tell them to leave."

13 Q. Okay. You didn't give that much

14 thought to it, I guess?

15 A. Actually, no.

16 Q. All right.

17 A. I just wanted to let her know that.  
18 Q. Okay. Now, you said, I think, that  
19 you bathed her?  
20 A. I helped to bathe her, yes.  
21 Q. Okay. When?  
22 A. Around 1:00 o'clock.  
23 Q. Okay. And, but earlier than that you  
24 had bathed just her feet?  
25 A. I washed her feet.  
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1 Q. Washed -- just washed her feet while  
2 she was in the bed?  
3 A. Right.  
4 Q. And I think you noticed -- I think you  
5 told Mr. Shook that she had some blood on her forearms,  
6 that you noticed?  
7 A. Right.  
8 Q. And did you wash that off the second  
9 time when you bathed her?  
10 A. Right. The only thing I washed off  
11 first was her feet.  
12 Q. And that was blood on what forearm?  
13 A. It was on her right.  
14 Q. Okay. That's -- and so, everybody  
15 knows the forearm is from the elbow down?  
16 A. Right.  
17 Q. Wasn't any blood up on the upper arm,  
18 was there?  
19 A. Well, I didn't see anything.  
20 Q. Well, you notice those things, don't  
21 you?  
22 A. Right.  
23 Q. If there were dried blood up on an  
24 upper arm?  
25 A. Yeah.  
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1 Q. You would have noticed that?  
2 A. Yes.  
3 Q. And you would have cleaned it,  
4 wouldn't you?  
5 A. Right.  
6 Q. So there wasn't any dried blood on her  
7 upper arm, was there?  
8 A. I didn't notice any.  
9 Q. Okay. Ms. Campbell, have you been  
10 down here since Monday too?

11 A. Yes.  
12 Q. Did you get summoned to a meeting the  
13 other day?  
14 A. Which time?  
15 Q. Did you get instructed over at lunch  
16 the other day to come meet?  
17 A. Which meeting? I mean, yeah, we only  
18 met one time.  
19 Q. Who -- how did you know that -- who is  
20 we?  
21 A. The other nurses that I am with.  
22 Q. Okay. Did y'all all come down  
23 together?  
24 A. We -- they flew us down. We came on  
25 the same plane.  
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1 Q. To where?  
2 A. To Kerrville.  
3 Q. They flew you to Kerrville?  
4 A. We came on the same plane to  
5 Kerrville.  
6 Q. Is that a private --- I just assumed  
7 y'all came on Southwest Airlines. Y'all came on a  
8 private --  
9 A. No, we came on Southwest Airlines.  
10 Q. Okay. I hadn't seen them land in  
11 Kerrville lately, so you got me --  
12 A. No, I'm sorry, we went to San Antonio  
13 and drove to Kerrville.  
14 Q. You got me a little confused.  
15 All right. Did y'all all rent a car  
16 together, all of the nurses, and come up together? How  
17 did you do that?  
18 A. Well, we're -- we took a van to  
19 Kerrville.  
20 Q. Okay. A State van that picked y'all  
21 up?  
22 A. Yeah.  
23 Q. And when did y'all come in, Monday  
24 evening?  
25 A. Yes.  
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1 Q. Okay. And that was all of the nurses  
2 who have come in here and testified before, and I guess  
3 Denise, who was after you?  
4 A. Yes.



5 Q. Okay. And now this meeting that -- is  
6 it okay if I describe that as a meeting the other day?

7 What would you call it?

8 A. Well, I mean, people met. I mean,  
9 people came together. I guess it was a meeting.

10 Q. A gathering, how about that?

11 A. Yeah.

12 Q. Okay. At this gathering -- how did  
13 you know about this gathering?

14 A. I think I was told by one of the  
15 nurses to show up there.

16 Q. What did she tell you?

17 A. To show up, and show up at 12:00.

18 Q. Where?

19 A. To meet at 12:00

20 Q. Where were y'all meeting?

21 A. In a room in the hotel.

22 Q. Okay. You don't remember what room or  
23 whose room?

24 A. Room 109. I don't know whose room it  
25 is.

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1 Q. Okay. And who all was present there?

2 A. I really -- I mean, Dianne, Denise,  
3 myself, Toby, Chris.

4 Q. Toby, the District Attorney?

5 A. I mean, yes -- no, I'm sorry. Yes, he  
6 was there.

7 Q. Okay.

8 A. I don't remember. I mean, there were  
9 several people there.

10 Q. Okay. It was a good sized gathering?

11 A. Yeah.

12 Q. Dr. Dillawn there?

13 A. Yeah, he was there.

14 Q. And did Toby tell y'all the purpose of  
15 that meeting?

16 A. No.

17 Q. Did he sort of start it off -- and I'm  
18 not suggesting there's anything wrong with this, I'm just  
19 trying to find out what it was all about. Did Toby tell  
20 you why y'all had been --

21 A. I had no idea why we were going to go  
22 there.

23 Q. Did anybody tell you why you were  
24 summoned there?

25 A. Why we were asked to come to the

1 meeting?

2 Q. Yes.

3 A. I didn't know why we were going to

4 come to the meeting.

5 Q. Well, when you got there, did somebody

6 explain the purpose of the gathering?

7 A. Well, yeah, somebody explained the

8 purpose of that.

9 Q. Was that Toby?

10 A. I think so. I think so, yeah. He

11 was --

12 Q. Okay. Up until this gathering, had

13 you seen any pictures of Mrs. Routier?

14 A. No, I hadn't seen any pictures.

15 Q. And did you at the gathering see

16 pictures of Ms. Routier?

17 A. Yes.

18 Q. Did y'all have a table and you spread

19 them all out or what?

20 A. Yeah, there was a table, and there

21 were some pictures of her there.

22 Q. Okay. And were y'all standing around?

23 A. Yeah, we were standing around.

24 Q. Okay. And were -- was one person

25 talking, or were several people talking at once?

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1 A. Several people were talking at once.

2 Q. Okay. Would you like be looking at

3 one picture with one nurse and somebody else be looking

4 at another picture with another nurse, or with Dr.

5 Dillawn or with Toby?

6 A. We were just all kind of looking at

7 the pictures.

8 Q. I mean, was it like a group

9 discussion?

10 A. Well, I mean, we weren't all

11 talking -- it wasn't like a big group putting in input to

12 one discussion. We were just all --

13 Q. Well, for instance, did you say,

14 "Well, I noticed this," and somebody else would say,

15 "Well, I noticed that."

16 And somebody else say, "Well, look at

17 this." And somebody else say, "Well, what's that?"

18 And "What do you think this is?" And

19 "What do you think caused that?"

20 A. Well --

21 Q. I mean, were those kinds of questions  
22 being brainstormed around the table?

23 A. We were just saying like how this is a  
24 bruise. You know, what kind of bruise this was.

25 Q. You had expressed your opinion, I  
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1 guess?

2 A. Yeah, I expressed my opinion.

3 Q. Did everybody express their opinion

4 A. I don't know. Because I wasn't really  
5 listening to everyone.

6 Q. But you heard some of the people  
7 expressing their opinions about what it was that they  
8 were looking at and what those pictures meant that they  
9 were looking at?

10 A. I heard some people say things, but it  
11 was just kind of a jumble. Everybody was talking at one  
12 time.

13 Q. Well, was it -- you've been involved  
14 in, like, brainstorming sessions? You know what that is?

15 A. We weren't in a brainstorming session.

16 Q. Okay. Were y'all sitting there and  
17 saying that, you know, for instance, "I noticed this."

18 Did you say, "Look at this"?

19 Did somebody point something out to

20 you and say, "Look at this"?

21 A. Not really. We just looked at the  
22 pictures, and I was, like -- we were just -- we just kind  
23 of made comments on it. We didn't say "Did you see this?"  
24 Look at this, or --"

25 Q. You were verbalizing what it was that  
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1 you saw?

2 A. Yes, verbalizing what we saw.

3 Q. And everybody else was verbalizing  
4 what it was that they saw?

5 A. Yeah.

6 Q. Okay. How long were y'all doing this?

7 How long did this meeting take?

8 A. It was like 15 minutes, not very long.

9 Q. And what day was that?

10 A. I don't remember.

11 Q. You don't remember?

12 A. I think it was probably Tuesday.

13 Q. Okay. I sort of lost -- have you sort

14 of lost track of the days while you have been down here?

15 A. Yes, I have.

16 Q. So have I.

17

18 MR. RICHARD C. MOSTY: I'll pass the

19 witness.

20 I'll let you go. If you can figure

21 out what day it is, and get back to Dallas.

22

23

24

25

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1 REDIRECT EXAMINATION

2

3 BY MR. TOBY L. SHOOK:

4 Q. Mrs. Campbell, this wasn't a real long

5 meeting, was it?

6 A. No.

7 Q. Did I ever ask you to make up some

8 kind of story or lie about what you were going to say?

9 A. No.

10 Q. I just asked you questions about what

11 you remember?

12 A. Right.

13 Q. Okay.

14

15 MR. TOBY L. SHOOK: That's all I have,

16 Judge.

17 THE COURT: All right. You may step

18 down, ma'am.

19 Please don't discuss your testimony

20 with anybody who has testified; in other words, don't

21 compare it.

22 You may talk to the attorneys for

23 either side. If someone tries to talk to you about your

24 testimony, tell the attorney for the side who calls you.

25 You may be excused, subject to recall.

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1 Is that agreed?

2 MR. TOBY L. SHOOK: Yes, sir.

3 THE COURT: Both sides?

4 MR. RICHARD C. MOSTY: Yes, sir.

5 MR. DOUGLAS MULDER: Yes, sir.

6 THE COURT: All right. Thank you.

7 You may step down.

8 Ladies and gentlemen, we will be  
9 adjourned now until tomorrow morning, 9:00 o'clock. Same  
10 instructions as always. Thank you.  
11 If all the spectators will remain  
12 seated. Just remain in the courtroom, please. You can  
13 stand up and stretch, but don't go out there until the  
14 jury is gone.