

1 contact with people other than Mr. Hilliard and
2 Mr. McCain who said they saw a person they believed
3 matched the composite prepared by Diane Downs or under
4 her direction, period.

5 You had contact with people who believed
6 that, isn't that correct?

7 A. I'm really not sure. In reference to -- ?

8 Q. Would maybe reviewing those reports refresh
9 your recollection?

10 A. Yes, it would.

11 MR. JAGGER: Your Honor, I'm not requesting
12 disclosure of the reports. I would request the Court
13 to direct him to bring them up, not for disclosure or
14 marking in the courtroom or whatever, but at least
15 they can be brought up so he can refresh his
16 recollection.

17 I've never encountered this in all my years
18 of practice.

19 THE COURT: If he uses it to refresh his
20 recollection, then you're entitled to see it.

21 MR. JAGGER: I'll stipulate that I can't see
22 it. That's fine, but -- I've never had a witness so
23 ignorant of a case he investigated before in my entire
24 life. That's awesome.

25 I know the Court can decline it, but I'd