

1 A. I don't remember.
 2 Q. So there is the gesture that the deputy made,
 3 problems concentrating in school, anger management. Were
 4 there other factors or circumstances that played a role in
 5 your deciding for him to see a psychologist?
 6 A. Not that I recall.
 7 Q. Ms. Harris, is there any familial -- that is, in
 8 your family. Is there any familial history of any form of
 9 mental illness in your natural family?
 10 A. No.
 11 Q. Okay. Is there any familial history of any form
 12 of mental illness in your husband's natural family?
 13 A. I believe his mother.
 14 Q. Okay. Can you tell me what you understand his
 15 mother's mental illness to have been?
 16 A. I don't know.
 17 Q. Okay. What caused you to answer -- to say his
 18 mother when I asked you about familial history?
 19 A. Because I was aware, at one point in time, she
 20 had a mental -- was treated for mental illness.
 21 Q. Okay. That was during the time that you and
 22 your husband were married?
 23 A. No, this was -- I believe Wayne was a child.
 24 Q. Okay. Do you know anything about the nature of
 25 her mental illness at all?

1 A. It was regarding the van incident. And as I
 2 stated to you, the other reasons, concentration. That's
 3 all I can recall right now.
 4 Q. Can you recall whether Dr. Albert gave Eric a
 5 written questionnaire for him to fill out?
 6 A. He did.
 7 Q. He did?
 8 (Deposition Exhibit 4 was marked.)
 9 Q. Ms. Harris, I'm going to hand you what has been
 10 marked as Exhibit KH-4. And it is Bates range MK 0000323
 11 consecutively through 338. Ms. Harris, I'm not going to
 12 ask you to verify this. I'm just going to represent to you
 13 that your lawyer is familiar with it already. This is a
 14 copy of Dr. Cram's -- some records that you all produced in
 15 the case. And I want to ask you about the page that is
 16 marked as MK 0000336. Let me ask to you, please, to take a
 17 look at that and tell me whether you can recognize that as
 18 the questionnaire that Eric filled out in Dr. Albert's
 19 office.
 20 A. I have never seen this before.
 21 Q. Okay. Ms. Harris, before you visited with
 22 Dr. Albert for the first time on February 16, had you ever
 23 observed anything about Eric that caused you to believe
 24 that he was feeling downhearted, blue, or sad?
 25 A. Well, sure, at times.

1 A. I don't. You'll have to ask Wayne.
 2 Q. Okay. Do you know whether Wayne's mother's
 3 treatment involved an in-hospital treatment?
 4 A. I don't know.
 5 Q. Okay. Ms. Harris, did you meet Dr. Albert at or
 6 about the time that Eric began seeing him?
 7 A. Yes.
 8 Q. Okay. Did you meet Dr. Albert in his office?
 9 A. Yes.
 10 Q. Can you tell me about how long your first
 11 meeting with Dr. Albert lasted?
 12 A. 45 minutes approximately.
 13 Q. Had he seen Eric alone for some longer period of
 14 time that day?
 15 A. For a longer period of time than 45 minutes?
 16 Q. Oh, I'm sorry. I misunderstood your answer. It
 17 was 45 minutes?
 18 A. The three of us were together.
 19 Q. Okay. I thought you said four to five minutes.
 20 A. Oh, I'm sorry. No.
 21 Q. So the first visit with Dr. Albert, all three of
 22 you met for about 45 minutes?
 23 A. Yes.
 24 Q. Okay. And can you remember what you talked
 25 about during that first visit with Dr. Albert?

1 Q. Can you recall some of the things that made him
 2 feel blue or sad?
 3 A. Having to work late on school nights. No
 4 girlfriend. I'd wake him up at 11 or 12 on a Saturday
 5 morning, and he wouldn't know why I wanted him to get up at
 6 12:00 on a Saturday. He had tests to study for. Just
 7 teenage stuff.
 8 Q. Okay. Ms. Harris, before your first visit with
 9 Dr. Albert on February 16, had you ever seen Eric cry?
 10 A. Before Albert --
 11 Q. Let me limit this question to his high school
 12 years. I'm not asking you to remember back to, you know,
 13 when he was six years old; but let's just talk about when
 14 Eric was a teenager in high school. And let me ask it
 15 again with that privy. Before you visited with Dr. Albert
 16 the first time, can you recall Eric crying?
 17 A. I can't, right off, give you a specific. No, I
 18 can't.
 19 Q. Ms. Harris, before you visited Dr. Albert for
 20 the first time, can you recall Eric ever having any
 21 sleeping problems?
 22 A. No.
 23 Q. Ms. Harris, before you visited Dr. Albert for
 24 the first time on February 16, 1998, can you recall Eric
 25 ever acting restless or being unable to remain still?