

1 And your photo -- they are all your photos, I'm sorry --
2 withdrawn.

3 What are we looking at?

4 A It is a photo of the bathroom floor. Under the
5 redaction is the victim Shele Covlin. It shows the bathroom
6 floor around her head, showing the blood on the floor.

7 Q And immediately under the toilet, the white object?

8 A That's a roll of toilet paper.

9 Q And the bathmat is in the middle there?

10 A Yes, it's towards the center of the photograph, right
11 above the redaction.

12 Q Let's go to 275, please.

13 What is this?

14 A This is an overall view inside the bathtub, mainly
15 showing the floating child toilet seat and the water inside the
16 bathtub.

17 MR. BOGDANOS: Can we blow that up, please.

18 Q And do you see above -- what is that, above the
19 waterline, on the side of the tub?

20 A That line above the waterline is where the water was,
21 at one time. So basically it is a waterline.

22 Q So a watermark?

23 A It is a watermark, yes.

24 Q Did you measure the distance between that watermark and
25 the water level?

1 A Yes, I did.

2 Q And that distance was what?

3 A 3 inches.

4 Q Now let's go to 276, if it is not redacted.

5 276, tell us what we are looking at.

6 A This is a view of the bathroom, mainly showing the
7 bathroom sink, the medicine cabinet, and a portion of the
8 bathtub.

9 MR. BOGDANOS: And can we blow up on the towel
10 rack, please.

11 Q Do you see that?

12 What is that on the rack there?

13 A That's a green hand towel.

14 Q Did you find any other towel in that bathroom, at all?

15 A No.

16 Q Did you -- at some point later on did you lift up the
17 comforter and the blanket?

18 A Yes, I did.

19 Q Was there any towel anywhere there?

20 A No.

21 Q Was there any place in the bathroom that you didn't --
22 on the floor area, near the tub -- that you didn't search?

23 A No.

24 Q Ever find the larger, the other half of that green
25 towel?

1 Q Is that what you would be describing as a watermark?

2 A That is a watermark created by the blood that was in
3 the bathtub.

4 THE COURT: You just dropped your voice.

5 It was a watermark created by the blood --

6 THE WITNESS: That was inside the bathtub.

7 Q And obviously there was a point earlier that day that
8 the water was higher; correct?

9 A Yes, that's what created that mark.

10 Q Did you drain the water before taking this picture?

11 A Before taking the picture?

12 Q Before taking this picture, did you drain the bathtub?

13 A No, I did not.

14 As you can see in the photograph, the water is still in the
15 bathtub.

16 Q And when you took this picture, that watermark that you
17 described was already present; correct?

18 A Yes, sir.

19 Q By the way, did you do any independent checking of the
20 drains, specifically, in this bathtub?

21 A No. I drained the water, and the drain seemed to work
22 properly.

23 Q Well, do you know how that water managed to be reduced
24 from the watermark to the level that we see there?

25 How did that drain like that?

1 A The victim was probably in the bathtub.

2 THE COURT: Okay, the question is, do you know how
3 the water got down?

4 THE WITNESS: Yes.

5 THE COURT: You do know?

6 THE WITNESS: Yes.

7 Q And did you do your own scientific test, "yes" or "no",
8 sir?

9 A No.

10 Q So you're just trying to, like, figure out how it could
11 have happened; correct?

12 A That's what I was told at the scene that the victim was
13 found inside the bathtub.

14 THE COURT: Okay, sir, listen. The question is, do
15 you know how the water got down?

16 THE WITNESS: Yes, the victim was inside the
17 bathtub.

18 MR. GOTTLIEB: 276, please.

19 (Displayed on the monitor, in open court.)

20 Q Now looking at 276, that is another picture of the
21 bathroom.

22 And again, now we see this towel on the rack; correct?

23 A Yes.

24 Q Now if you can, take a look at it.

25 Do you see some reddish on that towel?