# STEVE CHANDLER'S ACTUAL TESTIMONY
# FOOTNOTE NUMBERS OF APPELLEES BRIEF

4:13:09- 4:13:35

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| Mrs. Powell: Would Keith be able to understand sarcasm in reflections in tones? |
| Steve Chandler: No if you was kidding with him he would take you serious |
| How so? |
| Steve Chandler: He literally – I mean he would well off the top of my head I can't give you an example that I can think of |
| Mrs. Powell: Okay --- what about your ---let's talk about your observation of your brother and your father's relationship |

## (FOOTNOTE NO. 61) 4:13:35-4:14:55)

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| Steve Chandler: Uh, well me and father farmed and Keith he was slow he just didn't get it you just had to show him how to do something over and over and there were times when my father and me both wanted him to learn --- but there were times I told daddy, I said hey just quit I will go ahead and finish it you all go on up there and whatever we was doing you go to the next stage I will finish this here because we are going to be here all night and uh |
| Mrs. Powell: So he didn't work on the farm much? |
| Steve Chandler: No he didn't even mow the yard hardly. |
| Mrs. Powell: Okay --- is there other examples of your dad having to tell him what to do or somebody having to show him? |
| Steve Chandler: Somebody had to tell him to do anything he did or he would just sit on the couch. |
| Mrs. Powell: Who would be in the house with him or who would be with him? |
| Steve Chandler: Mother or daddy |
| Mrs. Powell: So would he listen to your parents? |
| Steve Chandler: Yes |
| Mrs. Powell: He obeyed them if they said something he would do it? |
| Steve Chandler: yes |

6:38:20-6:39:04

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| Steve Chandler: I don't know he didn't think like that – he was slowed minded |
| Mr. Downey: He understood that when you talked to him about things when ya'll weren't agreeing that he needed to stare at his shoes didn't he? That's what he did didn't he? And my question is do you think – let's assume that Keith did tell you he wouldn't his friend – do you think Keith might of thought it would be a good idea to keep you from knowing that |
| Steve Chandler: I don't know why? |
| Mr. Downey: Because he didn't want you to infer in any way |
| Steve Chandler: Why you want to take – why would you want to treat somebody like that for 20 some odd years – kept their cattle and give you all the profit from it no work – he didn't even have to load them on sale day I did it |
| Mr. Downey: That's a different matter – Keith never proved himself did he? |
| (FOOTNOTE NO 61) 6:39:05-6:40:49) |
| Steve Chandler: Proved himself what do you mean? |
| Mr. Downey: Proved himself |
| Steve Chandler: What are you trying to say? |
| Mr. Downey: You said in your deposition |
| Steve Chandler: let's see what I said |
| Mr. Downey: Okay – just a minute |
| Steve Chandler: What page you on? |
| Mr. Downey: Give me just a second |
| Steve Chandler: Okay |
| Mr. Downey: Page 19 |
| Steve Chandler: Alright |
| Mr. Downey: Talking about when he got the 230 acres or so |

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| Steve Chandler: What line are looking at? |
| Mr. Downey: Line 4 -- before that we are talking about where you got a deed to property in '97 and he did too |
| Steve Chandler: Page oh 19 okay |

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| Mr. Downey: 19 |
| Steve Chandler: Line 4 |
| Mr. Downey: Question on Line 4 and you were aware of both of you – obviously you were aware of yours – but were you aware in August that this conveyance was made to Keith of certain portion – yeah – I was happy for him and I was hoping that finally he would take some initiative to work on the farm and prove himself ----but he never did it did he – he never proved himself to you did he? |
| Steve Chandler: This says and improve himself |
| Mr. Downey: And prove himself |
| Steve Chandler: I |
| Mr. Downey: Not improve himself – improve himself |
| Steve Chandler: okay and prove himself |
| Mr. Downey: Yes sir |
| Steve Chandler: That's what I said but what I meant was that he would take an interest in farming cause he could have been independent if he had of. |
| Mr. Downey: He didn't really like farming much did he? |
| Steve Chandler: No he stayed with my mother she babied him. |
| Mr. Downey: He didn't like school a lot, didn't like farming |
| Steve Chandler: Well I don't know if he didn't like school he just wouldn't able to do the work my mother had to do it for him – I watch her do it for twelve school years. |

6:53:03-6:54:00

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| Mr. Downey: Did Keith ever say anything to you out of the way – did he ever argue with you? |
| Steve Chandler: No |
| Mr. Downey: Never |
| Steve Chandler: No |

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| Mr. Downey: Okay |
| Steve Chandler: Well we might have argued over the last biscuit or something but I mean that be about it. We never did have a fight – I never beat my brother up, I've never choked him, I've never abused him, I've helped him his entire life, that's why he's got all that money in the bank he never went anywhere, did anything. |
| Mr. Downey: That's also one reason you understand why people called him double zero because a hundred dollar bill |
| Steve Chandler: No they called him that because he's slow. |
| Mr. Downey: You all had you had issues with Keith over the years where you were frustrated, |
| (FOOTNOTE NO. 64) 6:53:54- 6:54:32) |
| Mr. Downey: he didn't want to farm, just various things about |
| Steve Chandler: He never did farm. |
| Mr. Downey: I understand and it frustrated to you didn't it? |
| Steve Chandler: No it didn't frustrate me, I did what my mom and dad told me. They said you are going to have to help your little brother take care of him. |
| Mr. Downey: But his, his to you the thing that he didn't do that you wanted him to as in prove himself farming was frustrating to you wasn't it? |
| Steve Chandler: No it wasn't |
| Mr. Downey: Okay -- there were times when you all had issues between you |
| Steve Chandler: Such as |

| (FOOTNOTE NO. 61) 6:54:00-6:54:32) |
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| Steve Chandler: He never did farm. |
| Mr. Downey: I understand and it frustrated to you didn't it? |
| Steve Chandler: No it didn't frustrate me, I did what my mom and dad told me. They said you are going to have to help your little brother take care of him. |
| Mr. Downey: But his, his to you the thing that he didn't do that you wanted him to as in prove himself farming was frustrating to you wasn't it? |
| Steve Chandler: No it wasn't |
| Mr. Downey: Okay -- there were times when you all had issues between you |
| Steve Chandler: Such as |

6:31:53-6:33:10

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| Mr. Downey: And my question is had you been doing that before he sent you a certified letter, took a copy here to town to the sheriff's office in this building and gave it to him and then finally had to tape it on you're the four wheeler that you had uh – are you saying that he just had reason to write you that letter before that time, none whatsoever? |
| Steve Chandler: None |
| Mr. Downey: Or I thought what you said was if you wanted me to stay off you should have just come and talked to me about it – so which was it that you never were |
| Steve Chandler: I don't recall either one of them. |
| Mr. Downey: Was it that you never were on his property -- that you thought he should come and talk to you about it? |
| Steve Chandler: Slow down – slow down – now say it again |
| Mr. Downey: Was it that you never came on his property before he wrote that letter to you or was it that you as you said a moment ago all you had to come and do was talk to you about it rather than send you a letter? |

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| Steve Chandler: Well let me tell you this – the only time I was on his property before this letter – I was making him thousands of dollars a year putting up hay up there – first cutting made 200 round bales and I give him every bit of it and after I got – |
| Mr. Downey: Did you put calves |
| Steve Chandler: and that was the only time I was on his land. |
| (FOOTNOTE NO. 63) 6:33:10-6:33:24) |
| Mr. Downey: Did you put calves on his land in some pins? |
| Steve Chandler: yeah I did in my mothers |
| Mr. Downey: But Keith owned that land then didn't he? |
| Steve Chandler: My mother told me |
| Mr. Downey: Your mother had a life estate |
| Steve Chandler: My mother told me to come here and put up there like always. |
| Mr. Downey: Alright |

6:49:35-6:51:27

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| Mr. Downey: Just a couple other things |
| Steve Chandler: okay |
| Mr. Downey: Mr. Chandler |
| Steve Chandler: Yes |
| Mr. Downey: Uh the Plant Superintendent and now Operations Manager at Raylock will testify about what a good and valuable employee Keith was for Raylock that surprises you doesn't it? |
| Steve Chandler: No if he says so I take him at his word. |
| Mr. Downey: But it surprises you that Keith would have someone that thought that highly of his work abilities and what he did at work doesn't it sir? |
| Steve Chandler: No because he found work that he could do. |

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| Mr. Downey: Isn't that inconsistent with your view of your brother? |
| Steve Chandler: No I don't think it is. |
| Mr. Downey: Tommy Wolfe his supervisor will say he was dependable, had a good attitude, got along with his coworkers, give him a list at the beginning of the shift and he got it done by the next morning, never had to say anything to him about it, different job than having to build a heavy duty starter or a starter |
| Steve Chandler: Well I'm proud of my brother. |
| Mr. Downey: I'm sorry |
| Steve Chandler: I said I'm very proud of my brother for that. |
| Mr. Downey: Right – and those are things that really before now didn't know about what he did at work – isn't that fair—you didn't know |
| Steve Chandler: I didn't know about that. |
| Mr. Downey: You did not know that he was so well thought of at work did you? |
| Steve Chandler: No but I know he has come home from work at night from Raylock crying because he had been picked on and bullied. |
| Mr. Downey: That was – that didn't happen for fifteen years did it? |
| Steve Chandler: I don't know it happened a lot – you know what it's like to see your little brother crying after people picking on him and he's a grown man in his thirties – forties. |
| (FOOTNOTE NO 63) 6:51:27-6:52:40) |
| Mr. Downey: The uh bull that you talked about earlier was on Keith's land right? |
| Steve Chandler: Yes |
| Mr. Downey: Okay and when you went to put the bull on Keith's land or take it off one |
| Steve Chandler: I took it up there |
| Mr. Downey: that's when you found the chain right |
| Steve Chandler: to the feed lot – like I've done for forty something years – my mother told me to bring it on up here and that's why I did it. |

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| Mr. Downey: (makes a frustrated noise) okay |
| Steve Chandler: What? |
| Mr. Downey: How many acres |
| Steve Chandler: and it was Keith's land |
| Mr. Downey: How many acres did you have? |
| Steve Chandler: Did I |
| Mr. Downey: 350, 370 |
| Steve Chandler: Did I have? |
| Mr. Downey: Yes sir |
| Steve Chandler: 360 |
| Mr. Downey: Did you have barns? |
| Steve Chandler: Yes but I had the herd down there. |
| Mr. Downey: On Keith's land |
| Steve Chandler: I had the herd on my land where I kept mine and Keith's and my father's cattle. If you don't take the bull away you are going to have calves all year round. |
| Mr. Downey: I get that. |
| Steve Chandler: For forty something years we always took the bull up to mama and daddy's and kept him up there with some – a couple other cows. And the time when you want your cows to start breeding – like I like a February born calf so that means you get them down there in May. |
| (FOOTNOTE NO. 95 6:52:40-6:52:58) |
| Mr. Downey: And that's |
| Steve Chandler: So you can start breeding |
| Mr. Downey: When you encountered the chains? |

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| Steve Chandler: Yes |
| Mr. Downey: Okay, and this is after your dad was gone? |
| Steve Chandler: Yes |
| Mr. Downey: Okay |
| Steve Chandler: Now it's hard to break a habit that you've done from almost 45 years and work practice and your mother telling you to come on. |
| 6:22:12-6:23:03 |
| Mr. Downey: You don't have any idea what they talked about at work – you don't have any idea what they talked about on their lunch break and sitting on the beds of their truck – do you sir? |
| Steve Chandler: No I don't |
| Mr. Downey: And I'm trying to find anything other than the coincidence that Keith started acting mean after the Tink deed and the fact that Randy showed up and about the same time – I'm trying to find anything else that you said that has any merit to it that's evidence |
| Steve Chandler: Well |
| Mr. Downey: That Randy Fish unduly influenced Keith in some way |
| Steve Chandler: Well he influenced – he effected my brother and changed him and made him mean and it all happened when he started coming around – they changed the locks on the house that hadn't, that's been there for forty years didn't even give my mother the, the owner of the house a key |

6:23:03-6:24:20

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| Mr. Downey: You have no evidence |
| Steve Chandler: I've got my eyes I know what I saw |
| Mr. Downey: I am not saying whether they were or weren't changed |
| Steve Chandler: They are still on there |
| Mr. Downey: You cannot connect Randy Fish to that act can you? |

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| Steve Chandler: Yes |
| Mr. Downey: No you can't and you can't connect him to putting locks on the gate there either can you? The chains on the gates. |
| Steve Chandler: Can I see – did I see him – no |
| Mr. Downey: Right |
| Steve Chandler: No I didn't see him |
| Mr. Downey: And – (doesn't talk from several seconds) whether |
| Steve Chandler: But I know he wrote |
| Mr. Downey: You deny – you deny the choking incident on the |
| Steve says: That's right it never |
| Mr. Downey: Four wheeler |
| Steve Chandler: Happened --- I never chocked my brother on or off a four wheeler |
| Mr. Downey: You threatened to – to Keith – you threatened Randy and said not only don't let me catch him on my property when you put those trespassing signs up you said I'll kill him didn't you |
| Steve Chandler: No I didn't |
| Mr. Downey: No |
| Steve Chandler: No – I know what I said |
| Mr. Downey: Okay |
| Steve Chandler: I said I don't want to catch Randy Fish on my land and that's not the only sign on |
| (FOOTNOTE NO. 96) 6:24:20-6:24:54) |
| my farms that's got trespassers will be shot because after you've had your cattle turned out, shot, your tractors shot up, you spend thousands of dollars sowing down a crop and some yoyo comes through there and ruts it up and tears it up and it takes thousands of dollars to repair it you get a little tired of it. |
| Mr. Downey: You are not saying anybody did that here are you |

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| Steve Chandler: No – are you? |
| Mr. Downey: Pardon |
| Steve Chandler: are you? I'm not |
| Mr. Downey: I'm just asking you a question sir |
| Steve Chandler: Okay Bud I am just answering them best I can |
| Mr. Downey: Alright |
| 6:28:09 –6:28:57 |
| Mr. Downey: It indicates on here – It's got Keith's P.O. Box on there up in corner |
| Steve Chandler: Yes |
| Mr. Downey: You can—you can tell who it was from when you saw it and didn't sign for it right? |
| Steve Chandler: uh huh |
| Mr. Downey: Why didn't you sign for it? |
| Steve Chandler: Because I didn't know what was in it but I always knew it was a legal move to have a record |
| Mr. Downey: A record about what? |
| Steve Chandler: I don't know |
| Mr. Downey: About stay off my land |
| Steve Chandler: No I didn't know what was in it |
| Mr. Downey: Well why would you – if you weren't having any trouble with Keith why would you not open a letter from him that was sent to you? |
| Steve Chandler: Why would he send me |
| Mr. Downey: And worried about it being a legal move? |

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| Steve Chandler: Well I didn't know it was a legal move and if got to talk to me you don't have to have no certified letter, you can either call me or come and see me – all he had to do was come down there, |
| (FOOTNOTE NO. 101) 6:28:57-6:29:02) |
| Steve Chandler: he didn't have to have the Sheriff to borrow one of my tractors to take up there that he wanted to use. |
| (FOOTNOTE NO. 98) 6:29:03-6:29:45) |
| Mr. Downey: So you are unaware of the conversations that he had with Mr. Fish uh and Mr. Robinson with some of those about his frustration with you not staying off his land with your friends to hunt |
| Steve Chandler: I wouldn't on his property with his friend, with my friends |
| Mr. Downey: Okay – So I'm puzzled though |
| Steve Chandler: Okay |
| Mr. Downey: If you all were getting along so well then why wouldn't you open a letter from your brother? But you thought it was a legal move a legal move about what? |
| Steve Chandler: I thought it was something that Randy Fish put him up to and I wouldn't going to put up with – get a legal record on it |
| Mr. Downey: Alright so eventually you saw a copy of it on your four wheeler right? |
| Steve Chandler: Uh huh |
| Mr. Downey: Okay |

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| (FOOTNOTE NO. 97) 6:29:47-6:31:25) |
| Steve Chandler: But as far – it's just like one time Keith told me and buddy Jimmy Deadman to not come up there on him that his buddy – we were scaring his buddies turkeys – we hadn't been up there at all and we told him we hadn't and he said well my buddy he can't get no turkey's—I said well tell him maybe he needs to hire a turkey guide so he can get him one. |
| Mr. Downey: Okay – so you confronted Keith about this letter |
| Steve Chandler: Yes |
| Mr. Downey: And |

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| Steve Chandler: With my mother there |
| Mr. Downey: He as you said (MR. DOWNEY walking around the podium coming in front of Steve) he did this. |
| Steve Chandler: No he did this (Steve shows) |
| Mr. Downey: and he was sitting |
| Steve Chandler: Yes |
| Mr. Downey: And you said |
| Steve Chandler: and wouldn't answer me |
| Mr. Downey: he did that again some other time too didn't you? |
| Steve Chandler: What? |
| Mr. Downey: And you said he did that again on another occasion as well |
| Steve Chandler: Yes, He did that a lot in his life |

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| Mr. Downey: Yeah and he did that a lot |
| Steve Chandler: uh huh |
| Mr. Downey: When you were the one in his face didn't he? |
| Steve Chandler: No he did when mama and daddy got on to him for peeing in his pants, for doing this |

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| Mr. Downey: So here he's looking down as you are confronting him about this – he's looking at his shoes – you intimidated him didn't you? |
| Steve Chandler: No |
| Mr. Downey: Whether you meant to or not you intimidated him. |
| Steve Chandler: No I didn't. I asked him what it was about I never intimidated nobody. There wouldn't no way I could intimidate him if I wanted to my mother was there. |
| Mr. Downey: Did you stay off his land after that letter? |
| Steve Chandler: Yes |

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| Mr. Downey: Was found on – okay |
| Steve Chandler: I respected my brother's wishes – and when I did that I also quit baling his hay and giving him 100% of the profit, I quit mowing his farm keeping it clean and the values of it up. |

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| 4:54:19-4:54:25 |
| Steve Chandler: Oh, I made a point to have Jimmy Deadman with me because I got suspicious of these people and I had him as a witness to listen |
| (FOOTNOTE NO. 99) 4:54:25-4:54:50 |
| Steve Chandler: I told Keith that I put that sign up but it has no bearing whatsoever to you – you still got the keys to my locks for my gates you can come and go on me anytime, anywhere you want Keith I said but don't you have that Randy Fish with you. |
| Mrs. Powell: Okay so that was the end of that conversation? |
| Steve Chandler: That was it |
| Mrs. Powell: Did Keith say anything back to you about that? |
| Steve Chandler: No he looked at the toes of his shoes. |
| 5:37:12-5:38:45 |
| Mr. Downey: Let me, let me ask you this – when Randy first started coming around – he came in October of '04 and your dad was still alive |
| Steve Chandler: Yes sir |
| Mr. Downey: Right and then he started coming around in the spring or the, the uh, the spring or the summer of 2005 --- that's when he began coming more |
| Steve Chandler: The fall |
| Mr. Downey: After your dad died right – the spring and the summer of '05 right |
| Steve Chandler: The fall |
| Mr. Downey: Okay and you're saying that that uh that fall is when of '05 is when Keith started getting mean |

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| Steve Chandler: yes |
| Mr. Downey::And you say that coincided with Randy starting to come around more |
| Steve Chandler: Yes |
| Mr. Downey: Okay – I am going to ask you about the Tink farm |
| Steve Chandler: okay |
| Mr. Downey: Now first off you said you got two farms and Keith got two farms |
| Steve Chandler: My brother got two farms and I got one |
| Mr. Downey: Initially |
| Steve Chandler: Yes |
| Mr. Downey: Right and then later you got another farm |
| Steve Chandler: My mother on her own free will gave me the Tink place |
| Mr. Downey: Okay – alright uh so Keith had two farms that totaled about 230 acres |
| Steve Chandler: Uh huh |
| Mr. Downey: You had two farms—well there's really a third farm the 20 acres uh |
| Steve Chandler: Well |
| Mr. Downey: Totaling 370 acres correct |
| Steve Chandler: yes |
| Mr. Downey: Okay and |
| (FOOTNOTE NOS. 74 & 75) 5:38:55-5:39:02) |
| Mr. Downey: regarding the fact that your mother deeded the Tink farm to you, the 200 acre farm |
| Steve Chandler: Yes |

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| Mr. Downey: Keith expressed his dissatisfaction to you and to his mother about what he felt like was an uneven distribution of the property is that correct? |
| Steve Chandler: No it's not |
| (FOOTNOTE NO 76 (5:39:02-5:43:53) |
| Mr. Downey: I am going to ask you to look at Page 32 of your deposition – you recall your deposition being taken on July 15 of 2013 |
| Steve Chandler: uh huh |
| Mr. Downey: Excuse me |
| Steve Chandler: I think know what you are going to do |
| Mr. Downey: Your honor would you like a copy |
| Judge says: I have the deposition here |
| Mr. Downey: Alright – the question I just asked you was so Keith expressed his dissatisfaction to you and to his mother about what he felt like was an uneven distribution of the property is that correct and you said no correct |
| Steve Chandler: Today? |
| Mr. Downey: Today |
| Steve Chandler: yes I said no |
| Mr. Downey: On July the 15th – |
| Steve Chandler: it says here yes I'd say |
| Mr. Downey: So on July 15th you were asked this question – okay so Keith expressed his dissatisfaction to you and to his mother – to you and to his mother about what he felt like was an uneven distribution of the property is that correct. Answer Yes I'd say – okay Question and this would have been in 2005 when this happened answer uh huh nodding head in the positive – so when you were sworn to tell the truth in July of 2013 on July 15 at your deposition you said that Keith had told you about the Tink farm and being mad about it right |

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| Steve Chandler: I said that? |
| Mr. Downey: Right there |

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| Steve Chandler: Yes I said that but I didn't understand the question I didn't hear I didn't hear or understand this dissatisfaction to me and my mother I thought it was just dissatisfaction to my mother |
| Mr. Downey: Okay you also stated that Keith started being mean to your mother |
| Steve Chandler He did |
| Mr. Downey: Okay and it was because of the Tink farm wasn't it? It was because she gave the Tink farm to you wasn't it? |
| Steve Chandler: No that happened before the Tink farm |
| Mr. Downey: Look, look up above here Page 31 |
| Steve Chandler: Okay |
| Mr. Downey: Line 12 already did he express you unhappiness to you about that you say no not really of course later you were asked again and you well yeah he did to me and my mother but then do, do you answer there what I was trying to say before when he first got two farms and I got one farm he had more acres than I did and the worlds a beautiful place and for whatever reason when I got the Tink vessel my acreage up he had I don't know why but he was hard on my mother for doing that—did you say that? |
| Steve Chandler: Yes he was hard on my mother |
| Mr. Downey: Okay so it was related to the Tink farm wasn't it? |
| Steve Chandler: He was – well that contributed to it but he was mean to her before the Tink Vessel part |
| Mr. Downey: I don't see that anywhere but let's talk --- let's go ahead and you say and the question is and when you say hard on your mother what do you mean hard on your mother and your answer I mean like he would get up and take my mother to do her business in town and he would be mad at her, he would get up and go get himself something for breakfast and not get her anything and come back and eat it in front of her |
| Steve Chandler: That's true |
| Mr. Downey: And that's when we are talking about the Tink farm isn't sir? |
| Steve Chandler: He done that a lot – not just this one incident |
| Mr. Downey: Well --- let's go back up – did you say and for whatever reason when I got the Tink vessel my acreage up he had a -- I don't know why but he was hard on my mother for doing that |

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| Steve Chandler: He was |

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| Mr. Downey: The examples that you gave her about him doing this and being hard on your mom – nobody's defending him for doing that if he did uh are related to your answering when your being asked about the 200 acre gift to you from your mother of the Tink property aren't you sir? |
| Steve Chandler: Say it again so I can understand it |
| Mr. Downey: Your answer about Keith going to breakfast, being hard on your mother |
| Steve Chandler: Yes |
| Mr. Downey: Your were answering that in direct response – you were directly responding to a question about Keith being mad about the Tink gift to you |
| Steve Chandler: Yes |
| Mr. Downey: from your mother weren't you sir? |
| Steve Chandler: yeah sir |
| Mr. Downey: Okay |
| Steve Chandler: but here where it says he would go get something and not get her anything and eat it in front of her – he did that several times before this question ever came up |
| Mr. Downey: Okay so |
| Steve Chandler: So it's not the only time |
| Mr. Downey: But in this incidence you say – I don't know why but he was hard on my mother for doing that giving the Tink property to you –correct |
| Steve Chandler: yes correct |
| Mr. Downey: And you knew about that? |
| Steve Chandler: My mother told me |
| Mr. Downey: And he told you? |
| Steve Chandler: No he didn't tell me |
| Mr. Downey: Well we've already gone over that part |
| Steve Chandler: well he didn't tell me |

| MRS. POWELL'S REDIRECT CONCERNING FOOTNOTE 76 (IMPEACHMENT ALLEGATION) |
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| 6:56:42-7:00:31 |
| Mrs. Powell: Your Honor may I redirect him |
| Judge Williams: Yeah sure |
| Steve Chandler: Is that it? |
| Mrs. Powell: No. Sorry. You were just asked about a statement that you said I am going to give this to you and let you read her question that was asked to you – I'm sorry he asked you about saying that you expressed dissatisfaction. |
| Steve Chandler: I expressed dissatisfaction? |
| Mrs. Powell: That your brother expressed dissatisfaction to you over the Tink place. |
| Steve Chandler: No he didn't say a word to me about it. |
| Mrs. Powell: Okay I just need you to read |
| Steve Chandler: He never bragged or he never complained. |
| Mr. Downey: Where are you please? |
| Judge Williams: What page? |
| Mrs. Powell: I am on Page 31 there's two places here – I am on Page 31 beginning on number 21 and read all the way down to Page 32 15 – read what you said and then read what Ms. Moore jumps in with. |
| Steve Chandler: Okay from 21 to |
| Mrs. Powell: Yes just read her question |
| Mr. Downey: through 20 correct |
| Steve Chandler: 21 through 20 |
| Mrs. Powell: On this page on page 31 beginning on number 21 I need him to read all the way down to 16 on the next page. |

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| Steve Chandler: Okay -- are you with me Mr. Downey? Ready |
| Mr. Downey: yes sir I'm the one that pointed this out to you. |
| Steve Chandler: Okay. And when you say hard on your mother what do you mean hard on your mother? I mean like he would get up he would take my mother to do her business in town and he would be mad at her he would go he would get up and go get himself something for breakfast and not get her anything and come back and eat it in front of her – okay—he told her that he didn't like it – he told her if he didn't and if she didn't like the way things were there that she could go live with her other son and I told my mother come on you can live with me don't even pack your clothes I'll buy you new clothes mama you don't have to take this – she said no I've got a lifetime dowry this is my house nobody is making me leave my house. So Keith expressed his dissatisfaction to you and to his mother about what he felt was an uneven distribution of the property is that correct? Yes I'd say |
| Mrs. Powell: You can stop there – so you |
| Mrs. Downey: I ask that the next three lines be read in fairness, it just cuts off in the middle of nowhere |
| Mrs. Powell: Okay then in fairness read the next three lines |
| Steve Chandler: uh -- okay so this would have been in 2005 when this happened? Uh huh (Nodding head in positive) uh okay now. |
| Mr. Downey: That's it |
| Mrs. Powell: Okay – you had been just like you have been here today upset you had gotten upset and you just said yes in response to her saying okay dissatisfaction |
| Steve Chandler: Yes |
| Mrs. Powell: Now I am going to have you turn to page – when I did my cross examination at that same day – Page 100 and beginning on number 8 on Page 100 – I recognized you were upset so I came back to it |
| Steve Chandler: Number 8 |
| Mrs. Powell: Uh huh |
| Steve Chandler: okay, okay and we were talking about the Tink Place did Keith ever directly express his dissatisfaction to you about the Tink Place or only to your mother – only to my mom |
| Mrs. Powell: Okay so |
| Steve Chandler: and |

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| Mrs. Powell: Which is what you said here today initially. |
| Steve Chandler: Uh huh |
| Mrs. Powell: The one response that he brought up to impeach you with was with Ms. Moore putting the words in your mouth and you just agreed and you said uh huh |
| Mr. Downey: Your Honor objection to the leading |
| Judge Williams: Sustained |