In full, [the victim's] trial testimony, concerning the alleged assault, is as follows: Direct:

"Q What did he hit you with?
A A tire iron
Q How many times did he hit you?
A About eight or twelve.
Q What parts of your body did the blows land?
A My head and my hands, protecting myself. [SM-91] ...
Q Please continue.
A And then he hit me some more.
Q What did he hit you with?
A The tire iron.
Q Back in the van again?
A Yes.
Q How many times did he hit you the second time?
A About six or seven. [SM-92]
Q What were your injuries?
A I sustained six skull fractures. ..." [SM-93]

Ms. testimony of the event, in full, on cross-examination, conducted by Vilella, a pro se defendant, reads as follows:

"Q Mrs. , you testified that I hit you in the van approximately eight to ten times or six to ten times?
A About that. [SM-98] ...
Q Mrs. , you were hit, you said, again six to ten times in the van?
A I said anywhere from eight to twelve times.
Q Eight to twelve times in the van? you opened the door and ran out? ... [Y]ou came behind me and dragged me back in the van.
Q Would you say you're a strong person?
A I do, but not when you're hit twelve times in the head with a tire iron when you're not expecting it. [SM-101]
Q ... You say somewhere in the Grand [Jury] Minutes I covered your mouth.
A You hit me from behind in the van and you kept hitting me and hitting me and then I somehow got out of the van and I screamed, and I couldn't do anything. You came behind me and dragged me back. I couldn't fight you. I wasn't expecting you to him me. ... When you're hit like that and you don't know what's coming, you can't do anything. You don't have the strength to do anything, not the way you were hitting me.
Q Would you describe to the Court how it was that I was hitting you?
A Violently with everything you had to hit me.
Q Could you show us, please? [SM-103]
A Show you? You took the thing and hit me.
Q Which way? Just go through the motions.
A I didn't see the first hit because I was under the blanket, but I saw afterwards because I protected myself from it.
Q Show us the second hit.
A You stood over me and hit me like this (indicating)
Q With the tire iron?
A With the tire iron that looks similar to that.
THE COURT: For the purpose of the record, did he raise his hand up over his head with the tire iron?
THE WITNESS: No, not all the way down over his head. ...
THE COURT: ... So he raised his hand halfway up to the head and struck down with the tire iron?
THE WITNESS: Right. ...
Q Were they tapping motions or you say violent?
A Violent." [SM-103-4]

HOSPITAL

[redacted]

7/17/86
Skull

ER5011A65 9
7096008

Skull shows no evidence of fracture. Sutures and vascular markings are normal. Sella turcica is regular in appearance. Petrous pyramids and ephemeral wings are intact.

IMPRESSION: Normal examination of the skull.

L. Tirol, MD

[redacted]

7/17/86
CAT scan brain

CT scan non-contrast of the brain was performed.

No shift of midline structures is seen. No subdural collection is seen. No blood in the white or grey matter is seen. Soft tissues of the skull to demonstrate any gross soft tissue swelling.

IMPRESSION: See above report.

L. Tirol, MD

Exhibit "B"