

DEPOSITION OF: GARY OLIVER - 10/20/2004

- 1 A. Yeah.
- 2 Q. And you were present at that time?
- 3 A. Yes, sir.
- 4 Q. Did you do anything to the horse?
- 5 A. When he got ready to go on the sale
- 6 ring?
- 7 Q. Did you check his feet?
- 8 A. No, sir.
- 9 Q. Did you have a hypodermic needle with
- 10 you?
- 11 A. No, sir, I had a hypodermic syringe.
- 12 Q. Okay. There we go. Did you have a
- 13 hypodermic syringe?
- 14 A. Yeah.
- 15 Q. What for?
- 16 A. I put kerosene and grease on his horse's
- 17 feet when we got ready to go in there.
- 18 Q. Now what is kerosene grease?
- 19 A. Coal oil, you know what coal oil is?
- 20 Q. Kerosene?
- 21 A. Yeah.
- 22 Q. And grease?
- 23 A. That's put on to keep the chains from
- 24 rubbing their feet.
- 25 Q. So that's the oil you put on them to--

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1       instead of--

2       A.                   (Interrupting) It's a mixture of motor  
3       oil and sulfur alum which is to protect their feet.

4       Q.                   Okay. And what's the color of this  
5       substance?

6       A.                   It's kind of a yellow looking grease.

7       Q.                   Yellow looking grease that you put on  
8       with a syringe?

9       A.                   No, no, I didn't say that.

10      Q.                   Okay. Well, you said you had a syringe.

11      A.                   I said I put kerosene and grease on his  
12      feet as a lubrication to put the chains on him.

13      Q.                   Do you rub the grease on?

14      A.                   Put it on with a brush.

15      Q.                   Okay. And this grease is, I assume, a  
16      thick--

17      A.                   (Interrupting) Fairly thick.

18      Q.                   (Continues) --grease you use to--

19      A.                   (Interrupting) It's not real thick.  
20      It's motor oil.

21      Q.                   Okay. You wouldn't put it on with a  
22      syringe, would you?

23      A.                   No.

24      Q.                   What do you use the syringe for?

25      A.                   Just for kerosene. I don't have it in

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1 the motor oil.

2 Q. You don't have it mixed up together?

3 A. No.

4 Q. Okay. So there was an occasion where  
5 you pulled out a syringe and put what you say is  
6 kerosene on this horse's hoofs.

7 A. That's what it was.

8 Q. I understand. How much quantity would  
9 you put on?

10 A. I just squirted some on both feet.

11 Q. Some on both feet or some on one?

12 A. Both feet.

13 Q. Okay. Well, how much? Do you measure  
14 it in CCs?

15 A. No, it doesn't have to be measured. I  
16 just want it so it will slick the hair down.

17 Q. How many--how big a syringe did you  
18 have?

19 A. Probably a 12, 15, or 16.

20 Q. Well, let's see. How round? How big  
21 around?

22 A. Maybe 3/4ths of an inch.

23 Q. Round as a quarter?

24 A. Yeah, probably.

25 Q. Okay. Mr. Martin say anything to you