Witness: Russell Graybill

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Called by: People (prosecution)

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Examinations: Direct – David Harris; Cross – Mark Geragos; Redirect – David Harris; Recross – Mark Geragos

Day 1 of 1 for this witness

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Direct Examination by David Harris

HARRIS: Mr. Graybill, we can see by how you're dressed, but for the record could you tell us who you are employed by?

GRAYBILL: I'm employed by the United States Postal Service.

HARRIS: And how long have you been with the postal service?

GRAYBILL: Almost ten years.

HARRIS: I want to direct your attention back to the year 2002. Since you've been with them for ten years, were you working in your capacity for the post office back then?

GRAYBILL: Yes.

HARRIS: What was your assignment -- to be more specific, in December of 2002, what was your assignment with the postal service?

GRAYBILL: I was a mail carrier assigned to a route out of the 54 zip code, 5401, which did, you know, various streets. 500 homes. And had the streets Rowland and Covena and all of the areas surrounding Yosemite and La Loma area. In Modesto.

HARRIS: All right. I was going to ask about that. This is in the City of Modesto?

GRAYBILL: Yes.

HARRIS: You mentioned the street of Covena. If you would, if you could look slightly behind you, do you see the chart up on the board?

GRAYBILL: Right. That's my mail route.

HARRIS: If we can have this marked as People's next in order.

Clerk: 33.

HARRIS: People's No. 33. I'll take it up to the exhibit.

Judge: 33. What does it purport to be, Mr. Harris?

HARRIS: This is a diagram of the area

Judge: Of the Covena area?

HARRIS: Yes.

HARRIS: Mr. Graybill, let me take this pointer and kind of acclimate you to this area. See on this diagram in the middle, top to bottom, where it's labeled Covena?

GRAYBILL: Yes, I do.

HARRIS: And then towards the bottom of the diagram, I don't know if the court can see as well, but from the left to the right where it says Encina?

GRAYBILL: Yes, sir.

HARRIS: And up here at the top where it represents to be Thousand Oaks Park, also known as Dry Creek or La Loma Do you recognize this general area?

GRAYBILL: Yes, I do.

HARRIS: And specifically looking at Covena, do you see the boxes starting to the right side of Covena above where it says Pierre Park 508, 516, 525 (sic), 526?

GRAYBILL: Yes, sir.

HARRIS: And do those represent the houses on the -- that would be the east side of the Covena Street?

GRAYBILL: The street addresses, yes, sir.

HARRIS: And then starting from the bottom and working on the west side of the street, 511, 517, 523. 523 Covena?

GRAYBILL: Yes, sir.

HARRIS: Do you recognize this -- this chart to depict that general area?

GRAYBILL: I know all those houses very well, sir.

HARRIS: Okay.

GRAYBILL: I know where every mailbox is on that street.

HARRIS: All right. Let me -- let me go through this so that we're all talking about the same date and talking about your daily activity. On December 24th of 2002, did you have a mail route that day?

GRAYBILL: Yes, I did.

HARRIS: And it's this route that you're talking about?

GRAYBILL: Yes, I did.

HARRIS: Can you tell the jury what do you do to get ready for your route to kind of keep track of your time?

GRAYBILL: In the morning you come in and the mail is, some of it is cased by machine. It's already put in a pre-sort bar code order so that you don't actually see that mail. It just gets handed to you as you get ready to leave for the street. There's a lot of mail, like your TV Guides, your Publishers Clearing Houses and things that's not sorted by machine that you have to physically put in a case. And that takes about two to three hours, from 7:30 to 10:00, generally. You pull all that down, you marry it together with this other mail that's already pre-sorted for you, you load it in your truck with all your packages and your parcels and various other stuff that you have to carry, your bag, your dog spray, those sorts of things. And you drive out to the beginning of the route and you start following the mail.

HARRIS: Now, does the postal service, and I don't want to make this sound sinister, but do they keep track of your time?

GRAYBILL: They have come out with a bar code scanning device for tracking packages, and when they came out with that device they arbitrarily decided to put these little bar code scanners on various mailboxes throughout the city. Like, I had six of them on this route, and about every hour there would be one of these little scan devices, and I would have to scan that device when I got to that house. But they weren't using it to track me, they were just using it for the information as to where I might be, at a given time. (Laughter)

HARRIS: So on this -- on this particular day, on the 24th, let's move you kind of to the Covena area Where is the -- or the Covena Avenue area. Where does your route actually start?

GRAYBILL: I would drive out of the main post . . . El Viejo Post Office would be down here somewhere.

HARRIS: You're indicating off

GRAYBILL: Off the map.

HARRIS: -- off the diagram.

GRAYBILL: Off the map. And as I would make my way over, I would drive down Encina Avenue, and my very first what's called a park and loop relay, you park the vehicle at one place and you loop around the houses, and then you come back up and you come back to the vehicle, you get in the vehicle, you drive to the next, and you park and you loop. And you do that all day long if you're on a park and loop route. My first stop would be 1402 Encina. I would walk down 1424, go across the street, deliver all these houses here, come back across Encina, go down Rowland, to the 400 block, which is off the map, come back up, come back to my vehicle. That's the first relay. Then I would get in my vehicle and I would drive to 1520 Encina, and I would shut the vehicle off, get out, drop the mail at that house. Drive around here, shut the vehicle off, drop the mail, drive around, shut the vehicle off. Same thing at 1515. Then I would park the vehicle --

HARRIS: Let me stop you there for a second because you're gesturing on the map. There's a little street that's slightly above Pierre Park?

GRAYBILL: Right.

HARRIS: What's the name of that street?

GRAYBILL: That's actually Encina. These are Encina addresses. Whatever the house door faces is the address of the house. In other words, if this house door faced this way, it would be a Covena address. But because it faced this way, it would be an Encina address. Does that make sense?

HARRIS: Yes. So if you drop off at 1515 Encina

GRAYBILL: Right, and I would park the vehicle right here on the corner of Encina and Covena, this is a split street here, even though it's not marked, and I would walk up the street here, and then come down the street here, and get back into my vehicle. But at this house back here, before I ever did that, there was a scan point.

HARRIS: Okay.

GRAYBILL: And at that house, I have to hit that scan point before I can proceed. And that allows me to know exactly when I was there, at what time.

HARRIS: Okay. I'd like to have marked next in order.

Judge: Number 34.

HARRIS: A document that appears to be a computer printout. All right. Mr. Graybill, I'm going to hand you what was marked as People's 34.

GRAYBILL: Okay.

HARRIS: Ask you to look at this and see if you recognize it?

GRAYBILL: Yes. When I got back to the post office, probably on the 27th or the 28th, when all of the investigation began and we found out that there was a missing person, I -- I pulled this out of the computer, or had it pulled out of the computer, because I wanted to be aware of where I was at a certain time on that day.

HARRIS: Okay. Let's go back through this. You became aware of the fact that Laci Peterson was missing at some point in time?

GRAYBILL: At some point. I was being questioned.

HARRIS: And did you know, on your route, do you get to know the people that are on your route?

GRAYBILL: Yes. You get to know the people on your mail route.

HARRIS: And did you know most of the residents or have some kind of acquaintance with the people on Covena?

GRAYBILL: I knew most of the people on Covena

HARRIS: So when you became aware that Mrs. Peterson had gone missing, did you want to provide the police with this information about what time it was that you were there?

GRAYBILL: Yes.

HARRIS: So you went back to the post office, and they have a computer program that would allow you to retrieve that scan information you have been talking about?

GRAYBILL: Yes.

HARRIS: So did you look at that scan information that you have there, I think it's in People's number 34?

GRAYBILL: Yes.

HARRIS: And after you looked at that, were you able to give an accurate kind of time frame that it was that you were on Covena Avenue that morning?

GRAYBILL: Yes. According to this, the post office, I was supposed to be at that box at 10:45, and I actually scanned the box at 10:19, so everybody got their mail early that day. So I was at 1424 at 10:19. And the time that it took me to drive around and to do that park and loop was plus or minus 15 minutes. Had I stopped and talked to everybody that day, it would not have taken me more than 15 minutes. I don't remember talking to anyone that day.

HARRIS: So after you pulled this information, did you write down the estimated times that you believe that you were on the Covena Avenue street by the Peterson house and turn that over to the detectives?

GRAYBILL: Yes, I did.

HARRIS: And do you recall what time it was, as best you can reconstruct from looking at the post office records, that you were on the Covena Street that day?

GRAYBILL: Yes.

HARRIS: And what time frame was that?

GRAYBILL: I was there between 10:35 and 10:50.

HARRIS: Now, this route that you were there between those two time periods, you had indicated, when you were gesturing before, you kind of started at 508 and worked your way up 516, 525 (sic), 526. I want to go through that a little bit. Do you know who lives at 508?

GRAYBILL: And elderly woman, I want to say Hafner, but I can't remember her name right now.

HARRIS: Do you know who lives at 516?

GRAYBILL: Susan Medina and her husband. The Medinas.

HARRIS: You were indicating before that you get to know people on your route. Do you also get to know if these people have dogs?

GRAYBILL: Absolutely. You know where all the dogs are. (Laughter)

HARRIS: I mean it might sound like a stupid question, but again, for the record, for the jury, can you tell us why postmen get to know where all the dogs are?

GRAYBILL: Well, I've only been bit twice in ten years, but all my mailmen friends have been bit, so we kind of get to know where the dogs are.

HARRIS: Are you aware of where the dogs are on Covena Avenue or street?

GRAYBILL: Yes, I am.

HARRIS: So you're walking this route, 508, 516, 520, going up the street. Are you aware that there's dogs there?

GRAYBILL: It sounds like a chorus. They start barking at one end, and the next one catches, and before you know it the whole neighborhood is pretty much a bunch of dogs barking. Especially on Covena. For some reason that's really obvious.

HARRIS: Do you get to know the dogs as well as part of working your route?

GRAYBILL: Some dogs you -- you know their names. Some dogs you deal with their customers on a day in and day out. Some dogs will attack a certain way. They'll guard certain areas. Some dogs will just back up, you know.

HARRIS: Do you, I guess going fairly close to the Petersons' house, across the street at 516, do you know if the Medinas had a dog?

GRAYBILL: The Medinas had what I call a little yipper, a little black dog that would go behind the gate and would be really loud behind the gate, but when she was outside with me, she would back up and get behind the gate. And I would actually close the gate in order to keep her back there. That's the kind of dog she was.

HARRIS: All right. And let's say, going up a little bit further at 520 or 525 (sic), do you know if there were dogs there?

GRAYBILL: 526 had a dog named Sage, which was a big Siberian husky, wolfhound-type dog, and I knew that dog from another mail route that I had when they lived at 505 Myrtle, and so Sage and I were old friends.

HARRIS: As you come down the other side of the street, where -- was there a dog at 529?

GRAYBILL: 529 was pretty much a vacant house. They rarely received any mail at all. And, no, I didn't see a dog there. Hardly ever. I encountered a dog at 523 Covena, a gray-faced Golden Retriever, I believe. And that --

HARRIS: Let me ask you about that, let's talk about that.

GRAYBILL: Okay.

HARRIS: At 523, you're talking about the Petersons' house?

GRAYBILL: Right.

HARRIS: Where the dog's been named or described to the jury as being named McKenzie. Did you happen to know that dog's name or just know the --

GRAYBILL: I learned that dog's name since; but, yeah, I knew that dog.

HARRIS: Had you had any interactions with McKenzie prior to the 24th?

GRAYBILL: I, as I remember it, there were times when the dog was out with her owner and he would take control of the dog and put the dog in the backyard whenever the mailman came by.

HARRIS: Let me stop you there for a second.

GRAYBILL: Okay.

HARRIS: Because you were gesturing and looking in a particular direction. The person you know as the owner of McKenzie, the dog we're referring to, do you see that person here in court.

GRAYBILL: Yes, I do.

HARRIS: And is that the defendant, Scott Peterson?

GRAYBILL: Yes.

HARRIS: Were you aware of Mr. Peterson from working on this mail route?

GRAYBILL: I knew who he was. I knew who Laci was. I knew who everybody was.

HARRIS: Okay. So just to go back through that, there would be times where the defendant or someone would be out with the dog as you're walking down the street towards 523. Can you describe what would happen as you would walk down there and if the dog was out?

GRAYBILL: The dog would guard the territory. The dog knew its boundaries, so . . .

HARRIS: Let me stop you. What do you mean by that?

GRAYBILL: Well, like one day there was no one there. The dog knew its boundaries, so . . .

HARRIS: What do you mean by that?

GRAYBILL: Well, like one day there was no one there, okay? The dog was out, all right? And the dog would not let me cross the property. Because you walk, there's no sidewalks. You skirt the grass, on all the houses. So as I would walk up to the house, the dog would be out, and it would be barking at me. But if I stayed in the middle of the street and kept walking right down the middle of the street, the dog would not come off the edge of the property. It would stay on its grass and let me proceed. And I could go up to the next house, at 517, and deliver the mail and the dog didn't have a problem with that. But Golden Retrievers are like that. They'll stay in their territory.

HARRIS: Specifically on December 24th of 2002, did you have any problem with the dog or the dog come out and keep you off the property?

GRAYBILL: No. I had no problems on December the 24th. It was a normal day.

HARRIS: And as far as you can recall were you able to deliver the mail at 523 Covena?

GRAYBILL: Yes, I was.

HARRIS: So you continued down the route, and at some point in time you get back to your truck?

GRAYBILL: Yes.

HARRIS: As you, since you're talking to us about it, being aware of dogs and stuff, as a postman do you try to pay attention to what's going on in the street for your safety?

GRAYBILL: You're constantly on guard for what might come out at you at any given moment, yes.

HARRIS: Was there anything out of the ordinary or anything out of the usual or anything that caused you to pay attention?

GRAYBILL: There was nothing out of the ordinary.

HARRIS: No other questions.

Cross Examination by Mark Geragos

GERAGOS: Russell, the note that you of there, that they marked as People's, I think, 34, do you have it in front of you?

GRAYBILL: Yes, sir.

GERAGOS: Is that how you tore, it looks like it's torn . . .

GRAYBILL: Right.

GERAGOS: about halfway from an eight and a half by eleven. Is that how you took it to the house?

GRAYBILL: This is -- this is my route, Route One.

GERAGOS: Okay.

GRAYBILL: And this was Route Two.

GERAGOS: Okay.

GRAYBILL: And, yeah, I would have just ripped it in half and sent it over there.

GERAGOS: Okay. The handwriting on the back?

GRAYBILL: That's my handwriting.

GERAGOS: Okay. And what did you put on there?

GRAYBILL: Detective Grogan, Russell Graybill, and my cell phone number.

GERAGOS: Okay. And the front part of it, is this on? It's not on? How long is that going to take? Do you know where you put that, this item when you, did you leave it in the mailbox at Covena?

GRAYBILL: It seems to me that I did.

GERAGOS: Okay.

GRAYBILL: I'm not exactly sure how it worked its way over there.

GERAGOS: So you got a call that somebody wanted to know when you were in this neighborhood?

GRAYBILL: (Nodded)

GERAGOS: And obviously you knew by the 27th that you were there sometime in the morning, because that's your usual route?

GRAYBILL: Yes, sir.

GERAGOS: You go to work, you tear off the sheet, the top half, so that you know at least this portion of the route, and then you leave it in the mailbox at Scott and Laci's house for him to deliver it to Detective Grogan; is that a fair statement of what you think happened?

GRAYBILL: (Nodded)

JUDGE: You have to answer out loud.

GRAYBILL: Yes, sir. Yes, sir. Thank you, your Honor.

JUDGE: She's writing.

GRAYBILL: Thank you. I'm shaking my head. Thank you.

GERAGOS: Okay. Now, the handwriting that's on there, is that yours also?

GRAYBILL: Yes, sir.

GERAGOS: And then you said "I was there between 10:35 and 10:50"?

GRAYBILL: Yes, sir.

GERAGOS: Okay. The scan time that you were talking about for -- can you use the pointer and point to the house where you were?

GRAYBILL: I was at, 1424 Encina is the address on that scan point, right there, all the way over. That's 10:19.

GERAGOS: Right. 10:19 you were where?

GRAYBILL: Right here.

GERAGOS: Okay. And then what's the next place that you go to?

GRAYBILL: 1520.

GERAGOS: Okay. Then from there to where?

GRAYBILL: I drive around to 1519.

GERAGOS: Okay.

GRAYBILL: Then I drive to 1515.

GERAGOS: All right.

GRAYBILL: Then I pull over here and I park.

GERAGOS: Okay. When you park -- when you say you park right there, this is -- it's labeled here as Pierre Park. It's kind of a grassy median area?

GRAYBILL: Correct.

GERAGOS: When you park there, where do you go?

GRAYBILL: I walk through the grass up to 508. There's a front mailbox on the porch here.

GERAGOS: Uh-huh.

GRAYBILL: And then I walk around the gate and go to 516, there's a mailbox there. There's mailboxes, et cetera, et cetera, all the way up here.

GERAGOS: The Medinas is right here?

GRAYBILL: Correct.

GERAGOS: When you went to the Medinas, what kind of a mailbox do they have?

GRAYBILL: They have a mailbox that is a security mailbox where you drop the mail down in the box, and then you have to catch this little flap that has the outgoing mail in it. You have pull that out first in order to put the mail in the box.

GERAGOS: So when you would go there on the Medinas mailbox, normally what would happen is you would have to pull the outgoing mail out first, that you could see; is that correct?

GRAYBILL: Correct, yes, sir.

GERAGOS: So there's kind of a flap that's like, as I'm demonstrating, where the mail rests on top of the mailbox, correct?

GRAYBILL: Correct.

GERAGOS: Okay. When you pull that mail out, the flap goes up, correct?

GRAYBILL: Yes, sir.

GERAGOS: And then you reach your hand down in and you grab the mail that's in there?

GRAYBILL: No, you deliver the mail

GERAGOS: Put the mail

GRAYBILL: you deliver the mail at that point. It's very complicated.

(Laughter)

GERAGOS: You can see that I was having trouble with it. The Medinas -- when I was talking to you in the hallway before you came in, I was asking you about specific memories on the 24th. You don't have any specific memories as you sit here today as to what happened on the 24th, do you?

GRAYBILL: No, I don't. Nothing out of the ordinary happened on the 24th.

GERAGOS: You don't remember if you delivered a package to the Petersons that day?

GRAYBILL: No, sir.

GERAGOS: Okay. And then I asked you also, if I understand correctly, you now have some kind of a bar code system where, if you delivered a package, you would know it by virtue of the bar code system?

GRAYBILL: If the customer that mailed it to them paid for the bar code to be put on there, then, yes, that package, any package that is received will be scanned.

GERAGOS: Okay. But you don't know as you sit here today whether you delivered a package on the 24th?

GRAYBILL: Not to the 523

GERAGOS: Okay. And you've checked?

GRAYBILL: Covena Yes, sir.

GERAGOS: Okay. Now, that day, in terms of your memory of that day, the best thing that we've got right now is this item that's on the screen?

GRAYBILL: Yes, sir.

GERAGOS: Okay. And the day that you put that item into the Petersons' mailbox, would that have been roughly the same day, the 27th of December, or the 28th?

GRAYBILL: In that time frame, sir, yes.

GERAGOS: Some time close

GRAYBILL: It would have been that week. It would have been out by the end of the week.

GERAGOS: Did you, I guess there's nothing on here that would identify what day it was that you ran that?

GRAYBILL: No, sir. No. It was just a printed report. This wouldn't be the date that, no, it just has the date December the 24th on it.

GERAGOS: Okay. Thank you. I have no further questions.

Re-Direct Examination by David Harris

HARRIS: Mr. Graybill, since we're talking about the Medinas box, I don't know how your handwriting is so I hate to put you on the spot.

GRAYBILL: No problem.

HARRIS: Would you grab one of the pens that's behind you and write on there Medina where, the box that represents their house at 516?

GRAYBILL: Their house faces this way and they have a little porch, and their mailbox was on the wall on the inside of the porch. As you, as you walk up to their house, there was a, a wall here, and the front door is right there. Opens in, rather. And their mailbox would sit right here, on this wall.

HARRIS: Okay. Can you, at 516 you've drawn an arrow to represent where the porch and the box is. Can you just write in the word "Medina" in that box so we know which house is there?

GRAYBILL: (marks map.)

HARRIS: Again, let's just label some of this so we don't lose track of this over time. 520, who was there?

GRAYBILL: That was Venable, Terra Venable? I don't always read all the names well. But it began with a V and it was like Venable. And this was the Wilmes. And this was a family with a Mexican name of Martinez, or something of that nature.

HARRIS: Okay. You don't need to label that one. Go on to the Covena,

GRAYBILL: They had a street box up here, and I don't remember their name.

HARRIS: And 523, that's the Peterson house?

GRAYBILL: This is the Peterson house. And this was, sometimes I identify them by what they do. Like this was a nurse, you know, what I mean? I don't always know the name, but she gets a lot of nurses' catalogs so I know she's a nurse, you know. And then this was an elderly couple with a motor home, so that's...

HARRIS: Going back, go ahead and have a seat.

GRAYBILL: Okay.

HARRIS: Going back to what you've written there as Venable at 520, was there a vehicle that you always remembered at that house?

GRAYBILL: There was a white van parked out on the street that was some kind of service company and that they did work for.

HARRIS: And did you see it as part of your route on a regular basis?

GRAYBILL: Most days it was there. Some days it wasn't, but it was, you know, it was like a route van, or something, that they had a sign on the side of it.

HARRIS: Let me go back to Medinas mailbox real quick. Mr. Geragos was trying to do the demonstration of how that particular box worked. Right around the 24th of 2002, December 24th, 2002, had that box been changed from another box?

GRAYBILL: Yes. They were concerned about their outgoing mail. Susan Medina worked at home and had a lot of outgoing mail every day, and she just wanted to make sure that she was as secure as possible. Plus, people who get checks in the mail, that kind of thing, they want to secure their mailbox any way they can.

HARRIS: Now, you were asked specifically if you had any, or you were asked if you had any specific recollection about different things or what you might have delivered. Because this was the holiday season, were you thinking about packages at that time?

GRAYBILL: Always. Every day is a dilemma: Do I, do I leave the package or do I take it back and make them come down to the post office at 5:30 at night on Christmas Eve? Can they get there? Can they get it? Yeah, you worry about that stuff. Should I notify it, shouldn't I?

HARRIS: So on the 24th of, December 24th, Christmas Eve of 2002, were you trying to deliver as many of those packages? Were you trying to make people go down to the post office?

GRAYBILL: I was trying on deliver as many of them as possible. I have two jobs. I deliver the mail and I safeguard the mail. And as long as something isn't being left out day after day, I generally don't get concerned.

HARRIS: All right. And you were asked about looking at this particular document, People's No. 34 that's projected up on the screen right now. Even though it doesn't tell you when it was printed, it does indicate on that document that that is for the route of Tuesday, December 24th, 2002?

GRAYBILL: That's where I was all day.

HARRIS: And you have, the handwritten information on there, that's what you wrote?

GRAYBILL: That's my signature and my handwriting.

HARRIS: And so from the best of, based on looking at that scan time of 10:19, that is a.m., right?

GRAYBILL: Yes, sir.

HARRIS: I mean I don't want to make a joke about you this, but just for the record, the post office doesn't deliver mail at night too often?

GRAYBILL: Too often, sir.

HARRIS: Okay. And from, based on that, you were on that street by the Petersons' house or in that general area between 10:35 and 10:50?

GRAYBILL: Yes, sir.

HARRIS: Thank you.

Re-Cross Examination by Mark Geragos

GERAGOS: Mr. Graybill, did the, any memory of whether Susan Medina had any outgoing mail that day?

GRAYBILL: I do not remember, sir.

GERAGOS: Would McKenzie bark at you, the Golden Retriever?

GRAYBILL: I do remember. Not that day, sir.

GERAGOS: Okay. And do you remember the way you described the dog as being on the,

GRAYBILL: Property.

GERAGOS: , property. I think we've got another map up here. This has been marked as People's 12. If this is the driveway that I'm pointing to right here and the gate, the mailbox is approximately where?

GRAYBILL: Right there, sir.

GERAGOS: Right there?

GRAYBILL: Right on this side of the gate, over here on the wall.

GERAGOS: Do you want to mark that, where the mailbox is. Okay. And then if this is the grass and this is the street.

GRAYBILL: Yes, sir.

GERAGOS: What you're telling the jury is is that if the dog was out, the dog would stay in this area here?

GRAYBILL: Yes, sir. The dog generally, the few times that I saw the dog actually get out, it would come from here. This gate would be left open.

GERAGOS: Okay.

GRAYBILL: The only other time I encountered the dog is here,

GERAGOS: When you're saying this gate, just so the record is clear, gate number two?

GRAYBILL: Yes, sir, gate number two.

GERAGOS: So if that's left open?

GRAYBILL: She would come running out here to me as I came across the property.

GERAGOS: Okay. She would stay, the dog, would stay on the grass but not go in the street?

GRAYBILL: Not after me.

GERAGOS: Okay. You would, that would even be if you were walking in the street, the dog would not come out to the street, would just, as you described it, very territorial, would stay on the grass, wouldn't leave to go into the street?

GRAYBILL: Yes, sir.

GERAGOS: Thank you. I have no further questions.