

## SUMMARY OF THE ARGUMENT

Petitioner argues the following:

Suzanne Seubert, in her SUMMARY OF THE ARGUMENT, the following was offered on the possibility it may be relevant to the issues.

Title 12 of the Delaware Code, Section 264 establishes a hierarchy of the persons who control the right to dispose of the last remains of a decedent. Respondent would be precluded from determining disposition by having been separated from Decedent and counterclaiming for divorce.

1) There was NO police investigation into the death of the decedent, causing the loss or lack of any evidence. Under Florida law, The Pasco County Sheriff was responsible for the investigation of the death of Laura Bowdoin under the laws of the State of Florida, Florida Statute 406.11. Charles Brening an investigator for the Florida MEs office, reported that the Pasco County Sheriff's Office would not be responding to the Decedent's residence or the hospital, nor would they be doing any investigation. Why? She was deceased at the home, per Fire Rescue, so there is no excuse, when

the crime unit was called for them not to investigate. This is a dereliction of duty. We have a serious problem with law enforcement today, when a 36 year old dies, in perfect health and the police do nothing. They just cleared the case within hours of her death, right at the hospital. How? Why? They have a moral and ethical responsibility to do what is right and just for ALL. The first person they always interrogate is the husband and the next person they should talk to is the mother, neighbors and friends. This is an injustice to my daughter, granddaughter, myself, and our family. Why did it take me hiring a private investigator for the police to finally start investigating?

2) You don't give authority to, or put a person in charge to rule, when you believe he has murdered the other person. What happened to when a spouse dies, the first person you look at is the other spouse. The police just cleared the case the morning of Laura's death. They were going through a bitter divorce. I witnessed it. Laura was afraid of her husband and thought he was putting poison or something in her food and drink.

3) A complete and full autopsy was not performed the first time, and it did not show the proper cause of death. There were no x-rays or microscopic testing done.

4) The detective finally went to the home of the decedent's on August 25, 2008 and retrieved medications overlooked on June 19, 2008,

Ambien medications prescribed to George Bowdoin and not to Laura.

Why did Mr. Bowdoin not tell Fire Rescue about the pills that day, he indeed told Lou Miglorie, that the morning of or the night before the decedent's death, he had dropped a bottle of pills in the sink and it shattered and the pills went all over the place. He had to pick the pills up and put them in another container. Fire Rescue found no pills, Why?

5) The Florida autopsy report dated June 20, 2008, reflects zolpidem toxicity as the cause of death; and the manner of death, undetermined; and, that the hyoid bone was intact. The level of Ambien was not enough to kill the decedent by itself, thus leaving the question of what else was involved.

6) Mr. Bowdoin told them at the hospital, that the decedent committed suicide, even though the decedent was the one to file for the divorce on May 12, 2008. His reply was on June 9, 2008, and Mr. Bowdoin wants us to believe that 10 days later on June 19, 2008 the decedent decides take her own life. She was happy and excited about moving on, he was the one that was enraged and trying to hold up the divorce anyway he could. He was the one that put a GPS tracking device in her car, tried to take video of her getting out of the shower in the nude, cried to me all the time telling me how much he loved her, how the thought of another man touching her

would kill him, his cussing, yelling, and screaming in front of my granddaughter and myself, his jealousy and possessiveness, the thought that he wasn't going to have enough money to live on, his deleting Laura's whole computer the morning after her death 6/20/08 at 5:18am, his threatening letter on it, proof of her e-mailing clients that night, and his running around with prostitutes that we have months of surveillance of.

In closing, I would pray that this Court would finally give my daughter Laura, the justice that the State of Florida would not. This autopsy is my only hope to prove what caused her death, because I and all her family and friends know that she did NOT commit suicide, as Mr. Bowdoin alleges. Mr. Bowdoin was the one that had everything to lose and couldn't bare the thought of Laura having a life without him.

This is Laura's only chance for Justice and to prove what really caused her death. With a Court order the Florida ME's Office will let us Have the samples they are still holding.

## STATEMENT OF FACTS

My pathologist, Dr. William L. Manion, MD, PhD, JD, MBA, triple certified, asserts

1.) he would like to conduct additional toxicology of the liver for determining whether the ambien was taken chronically or as an acute overdose, Trial Tr. At 6, because he would look for metabolites (ambien), Trial Tr. at 28; with gas chromatography - mass spectroscopy, Trial Tr. 33,

2.) the level of ambien was not a lethal dose, and

3.) he would recommend x-raying the hyoid bone and thyroid cartilage, Trial Tr. At 8. NOTING ALL SUZANNE'S TRIAL TR #'S

Contrary to the norm, Dr. Manion found

a) the autopsy reported no froth in the trachea or mouth, which he would have expected in a case involving overdose, Trial Tr. at 17

b) edema could have resulted from a (non) lethal overdose, Trial Tr. at 18.

Dr. Manion testified he consulted a report summarizing studies of lethal ambien levels and a medical textbook, Trial Tr. At 19-20.

Dr. Manion also testified that there is no evidence that "women die five (5) times as often as men with the same drug level," Trial Tr. At 24.9

Dr. Manion opines the Ambien by itself did not kill Laura.

Now, Respondent's expert Dr. William R. Anderson M.D. was asked by Mr. Fluke if he was provided a full version of the police report (pg7 line20). He said yes, yet it was not allowed to be entered as an exhibit. Dr. Anderson said the police report could be misleading (pg 8 line 1). However, Dr. Anderson did not need to worry about the report being misleading because the police were not doing any investigation. The police cleared the case right at the hospital within hours of my daughter's death. How is that possible?

Next, Mr. Fluke asked Dr. Anderson what was the cause of death (pg9 line3) Dr. Anderson said, very high level of **Ambien** in her blood (pg9 line10-14). And this certainly would be enough to **suggest**--certainly **suggest** the high **probability** that this **was related** to her development of pulmonary edema (pg10 line22-24). **Related**, but what else was included?

Next question, And previous reports concerning zolpidem overdoses and deaths prior to 2013, did they distinguish between men and women? (pg11 line16-18) Dr. Anderson said, well I'd have to look at specific reports whether the death cases did or not (pg11 line 19&20). Some indication that there was some suspicion that that might be the case (pg11 line22-24). My question is what else accompanied the Ambien in the

deaths? Dr. Anderson doesn't seem to be sure of the answer! He said he would have to review the individual cases (pg12 line 1). The Ambien levels can actually be more harmful or potentially dangerous in a woman than a man with the same dosage and we already have a high therapeutic dosage, then we have to look at this and say well, then, this is most likely the result of Ambien Intox --Ambien intoxication or toxicity (pg12 line20-24 & pg13 line 1). Again Dr. Anderson uses words like, some indication, some suspicion, might, most likely the result of Ambien, well then, it could also be something like other ingestants or smothering or strangulation etc. This is why we need to x-ray the hyoid bone, for fracture.

First Mr. Price says I should have called all my witnesses from Florida, and then contradicts himself and says in court, that has nothing to do with exhuming Laura's body, and that it is all hearsay. Court here in Delaware has always focused on what was happening in Florida, making it impossible to exhume Laura's body to find the truth. All my witnesses, from Florida, would have been testifying to what Laura had told each of them. This would have been crucial to my Florida case, but we were not allowed to say anything against Mr. Bowdoin. Judge Linda Babb, in the Florida court, said she didn't care if Laura died of a little Ambien or that it belonged to Mr. Bowdoin.