

1 Q And, Ms. Halpern, if you touch your screen, you might be  
2 able to circle the areas you're describing. If you could try.

3 So you've just made a blue mark in the middle of the  
4 screen. What is that pointing to?

5 A That's the clitoris.

6 Q And then you mentioned the introitus earlier. If you  
7 could please circle that.

8 A It's not doing a great job, but up here.

9 Q And for the record, that's slightly below the mark you  
10 made for the clitoris; is that correct?

11 A Correct.

12 Q And remind us what happens in that spot?

13 A That's where the stroker rests their thumb.

14 MS. FARRELL: If we could please move to page 8,  
15 Mr. McNett.

16 If we could please zoom in.

17 Q Well, first of all, what is the title of this page,  
18 Ms. Halpern?

19 A Steps to OM.

20 MS. FARRELL: If we could go down to No. 3, please.

21 If you could blow that up, please, Mr. McNett.

22 Q And Ms. Halpern, if you could read the heading in the  
23 first sentence out loud.

24 A "Positioning: The woman removes only her pants."

25 MS. FARRELL: And then if we could please highlight

1 or zoom in on No. 5, Mr. McNett.

2 Q And, Ms. Halpern, if you could read this aloud, please.

3 A "Safe port: The stroker deliberately speaks his actions  
4 before taking them. For example: I'm going to touch your  
5 thighs now. Is that okay? And waits for her response. This  
6 allows the woman to fully relax and feel. Safe porting takes  
7 place throughout the OM when he needs to make a change or  
8 unexpected movement."

9 Q So can you explain to the jury your understanding of the  
10 concept of safe porting?

11 A It's saying what you're going to do before you do it.  
12 So, I'm going to put my hands on your thighs now, I'm going to  
13 put my finger on your clitoris now. And the idea is, you  
14 know, as it states here, to ideally have the woman feel more  
15 at ease.

16 Q And how, if at all, does the concept of safe porting  
17 relate to consent?

18 A In the -- this is tricky because you are -- when you're  
19 in an OM, there are many points where the stroker says, you  
20 know, I'm going to do this, is that okay, and the strokee can  
21 say yes or no. So, you know, if I'm not ready, for example,  
22 and I need to move my position, I can say no, no, hold on  
23 one second. So that is, you know, consenting to that touch.

24 In an ideal world, you know, that would be consent  
25 for everything.