

## Truck Accident Case Depo-Redacted\_pl\_summary.pdf

Citation	Summary of Testimony	Topic Summary
2:1-5:25	The deposition begins with the videographer noting the date, time, and video file number. The witness, , is sworn in and asked to state and spell his name. He acknowledges being late for the deposition.	<ul style="list-style-type: none"> <li>- Deposition start - Witness identification -</li> <li>Acknowledgment of tardiness</li> </ul>
5:1-5:16	The attorney, Darren Tobin, introduces himself and explains the importance of verbal responses for the court reporter and videographer. The witness is reminded to speak loudly and clearly.	<ul style="list-style-type: none"> <li>- Attorney introduction -</li> <li>Instructions for clear testimony</li> </ul>
5:17-5:16	does not recall the appearance of Tobin's client, whether there were passengers in the minivan, the date of the crash, or the full name of his coworker, , who was with him in the truck.	<ul style="list-style-type: none"> <li>- Memory of the incident -</li> <li>Identification of individuals involved</li> </ul>
5:7-6:25	The deponent does not remember if the opposing client had passengers in the minivan or the date of the crash. He confirms working with a colleague named at and had worked together on most jobs for over a year before the crash.	<ul style="list-style-type: none"> <li>- Memory of the crash details</li> <li>- Employment and colleague information</li> </ul>
7:1-8:25	The deponent prepared for the deposition by talking to his lawyer but did not review any documents. He recalls receiving a ticket for the crash, which he paid (\$290). He admits full responsibility for the crash, stating neither the opposing client nor were responsible.	<ul style="list-style-type: none"> <li>- Preparation for deposition</li> <li>- Admission of responsibility for the crash</li> <li>- Payment of a ticket related to the crash</li> </ul>
9:1-12	The deponent is unaware of the Federal Motor Carrier Safety Regulations and states that did not provide any safety and health manual training. His opinion on the company is neutral or undecided.	<ul style="list-style-type: none"> <li>- Knowledge of safety regulations</li> <li>- Training at</li> </ul>
10:1-11:25	The deponent was not provided with a safety and health manual upon employment at . He describes the company as "all right" but mentions perceived racism from the owner's brother-in-law. He knew several people at the company, including his crew leader and a manager, who were not racist towards him. He was fired by a manager after a drug test incident following a crash.	<ul style="list-style-type: none"> <li>- Lack of safety and health manual -</li> <li>Perceived racism at the company -</li> <li>Relationships with crew leader and managers -</li> <li>Termination following a drug test incident</li> </ul>
12:1-12:25	After the crash, the deponent was required to take a drug test. He provided a urine sample, which was discarded by a nurse for being insufficient. When asked to provide another sample, he was too upset and left. He was subsequently fired by a manager, not at the clinic but at the company's shop.	<ul style="list-style-type: none"> <li>- Drug test procedure and issues -</li> <li>Termination process and location -</li> <li>Emotional response to the drug test situation</li> </ul>
13:14-15:23	The deponent was involved in a crash and subsequently taken to a clinic for a pee test by , who is believed to be a manager at . The truck was inoperable due to the crash, preventing the deponent from driving it to the clinic. After the clinic visit, drove the deponent to , where he was fired by . The deponent felt the firing was unfair.	<ul style="list-style-type: none"> <li>- Crash details</li> <li>- Post-crash actions</li> <li>- Employment termination at</li> </ul>

15:24-16:7	The deponent confirms the crash occurred around 7:40 a.m. on , 2018, after being shown a police report. This corrects his earlier uncertainty about the exact time of the crash.	<ul style="list-style-type: none"> <li>- Confirmation of crash details</li> <li>- Police report evidence</li> </ul>
16:1-19:21	The deponent confirms the time of the crash and identifies themselves and the opposing party from the police report. They agree with the sequence of events as described in the police report regarding the positions and movements of the vehicles involved in the crash. The deponent disagrees with the direction of the turn Vehicle No. 3 was making, stating it was a right turn, not a left. They also confirm not having any interaction with the opposing party immediately after the crash.	<ul style="list-style-type: none"> <li>- Time and date of the crash - Identification of parties from the police report - Agreement with the sequence of events from the police report - Disagreement on the direction of Vehicle No. 3's turn - Lack of interaction with the opposing party post-crash</li> </ul>
20:1-21:25	The deponent did not check on the safety of others or the speed at which he was driving during the accident. He acknowledges the severity of the crash through photographs of the damaged van he hit.	<ul style="list-style-type: none"> <li>- Safety checks post-accident</li> <li>- Acknowledgment of the accident's severity</li> </ul>
21:1-22:25	He worked at Pilgrim's Pride before his current employment, where he was involved in handling chickens but did not drive. His current employer did not conduct any driving tests or assessments when he started.	<ul style="list-style-type: none"> <li>- Previous employment</li> <li>- Lack of driving assessment at current job</li> </ul>
22:1-23:17	The deponent has been arrested multiple times for various offenses, including driving without a license, battery, possession of a controlled substance, and erratic driving. Some arrests occurred while employed at his current job.	<ul style="list-style-type: none"> <li>- Criminal history</li> <li>- Employment during some arrests</li> </ul>
6:7-24:25	The deponent discusses facing a battery charge and a controlled substance charge, though he is unsure of the substance involved. He mentions working for a small company of about 30 employees, where he was involved in erosion control tasks.	<ul style="list-style-type: none"> <li>- Legal charges faced by the deponent</li> <li>- Size and nature of the employer's business</li> <li>- Deponent's role and tasks at work</li> </ul>
24:1-26:25	He details the specific tasks involved in his job, including putting up fences, laying grass, and hydro seeding. He identifies his work group members and notes that he and another person were the drivers in their group, with six to ten other drivers in the company. He was friendly with some of the other drivers but only hung out with one outside of work. He also mentions being taken to the clinic by a colleague after an incident.	<ul style="list-style-type: none"> <li>- Specifics of the deponent's job duties</li> <li>- Work group composition and relationships</li> <li>- Interaction with colleagues outside of work</li> <li>- Incident leading to a clinic visit</li> </ul>
27:1-27:5	On the day of a crash, he was headed to a job site but cannot recall specifics. His truck had a blower attached, which he describes as a large piece of equipment used for blowing wheat straw, indicating it was not a handheld device but rather something that required operation from atop a trailer.	<ul style="list-style-type: none"> <li>- Circumstances on the day of the crash</li> <li>- Description of equipment attached to the truck</li> </ul>

27:1-30:22	The deponent describes the operation of a piece of equipment that requires two people to operate, mentioning it involves driving a 250 Ford truck and handling hay bales. He details meeting with a colleague at a shop to prepare for a job, starting at 7:00 a.m. The night before, he was at home with his family. During a drive, he noticed the client's minivan ahead of them for a couple of minutes without observing anything unusual about the driving. Following an accident, he and his colleague were initially unable to exit their truck due to its position.	<ul style="list-style-type: none"> <li>- Equipment operation and requirements - Pre-job preparation and meeting - Personal details about the night before the incident - Observations of the client's minivan before the accident - Immediate aftermath of the accident</li> </ul>
31:13-33:25	The deponent was unable to exit his truck immediately after the crash due to being blocked by a car in a ditch. He attempted to brake during the incident but the truck slid due to rain. He had checked the truck's condition before driving, noting concerns about the weight of trailers but was dismissed by a mechanic. He confirmed his testimony was truthful.	<ul style="list-style-type: none"> <li>- Incident details</li> <li>- Vehicle condition and maintenance</li> <li>- Weather conditions</li> <li>- Testimony verification</li> </ul>
34:1-34:25	The deponent described the sequence of events leading to the crash, noting that a car braked hard, causing a chain reaction. He attempted to brake but slid and collided with another vehicle.	<ul style="list-style-type: none"> <li>- Crash sequence</li> <li>- Braking and sliding</li> <li>- Chain reaction of braking</li> </ul>
34:20-35:22	The deponent confirmed that he had to slam on the brakes due to the vehicle in front braking suddenly. He speculated that if it hadn't been wet, he might have stopped in time. He also mentioned that a witness observed the car in front braking first. The deponent believed the accident wouldn't have occurred if he wasn't pulling a trailer, which he initially thought was too heavy based on comments from the state patrol, though a mechanic later disagreed.	<ul style="list-style-type: none"> <li>- Braking due to wet conditions</li> <li>- Witness observation</li> <li>- Trailer's impact on the accident</li> <li>- Weight of the trailer</li> </ul>
36:1-37:18	Further questioning clarified that the deponent's concerns about the trailer being too heavy were not about the specific trailer involved in the accident but a different one with different equipment. He was uncertain if the trailer on the day of the accident was too heavy, indicating a possibility but no certainty. The deposition concluded without the deponent being certain about the trailer's weight contributing to the accident.	<ul style="list-style-type: none"> <li>- Clarification about the trailer's weight</li> <li>- Uncertainty about the accident's trailer being too heavy</li> <li>- Conclusion of the deposition</li> </ul>