

In The Matter of:
Sharde Perkins, et al.

VS

Wyatt Smith

Sharde Perkins

March 03, 2017

Deposition



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IN THE COURT OF COMMON PLEAS

STARK COUNTY, OHIO

SHARDE PERKINS, et al.,

Plaintiffs,

-vs-

JUDGE JOHN G. HAAS
CASE NO. 2016-CV-02650

WYATT SMITH,

Defendant.

- - - -

Deposition of SHARDE PERKINS, taken as if
upon cross-examination before Sandra L. Rice, a
Notary Public within and for the State of Ohio,
at the offices of Kisling, Nestico & Redick, 3412
West Market Street, Akron, Ohio, at 9:00 a.m. on
Friday, March 3, 2017, pursuant to notice and/or
stipulations of counsel, on behalf of the
Defendants in this cause.

- - - -

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SHARDE PERKINS, of lawful age, called by the Defendants for the purpose of cross-examination, as provided by the Rules of Civil Procedure, being by me first duly sworn, as hereinafter certified, deposed and said as follows:

CROSS-EXAMINATION OF SHARDE PERKINS

BY MR. CORBEY:

Q. Good morning. My name is Tim Corbey. We briefly met off the record. I'm here to ask you a series of questions as it relates to the April 27, 2016 motor vehicle accident that you were in as well as the medical treatment you received as a result of that accident. Have you ever had your deposition taken before?

A. Yes.

Q. Was it recently?

A. It was last year.

Q. I'll go over the ground rules again just to refresh you. First, you're obviously sworn in; you need to provide accurate testimony. With that in mind I want to make sure that you understand the question I'm asking. It doesn't do you any favors if you don't know what I'm asking. Every now and then I'll ask a poorly-worded question. Please, let me know and

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1 I'll gladly rephrase or repeat that question. If
2 you answer the question I'm going to anticipate
3 that you understood that question; is that fair?

4 A. Yes.

5 Q. I also want to know the answers to questions that
6 you have an answer to. I don't want you to guess
7 and tell me something that you think might be
8 true. I want you to give me answers that you
9 have personal knowledge to. Okay?

10 A. Yes.

11 Q. If you don't know the answer to something please
12 tell me you don't know. Okay?

13 A. Okay.

14 Q. We also want to make sure that we give verbal
15 responses. Nods of the head and shrugs of the
16 shoulder make it very difficult for her to take
17 that down. It happens in almost every deposition
18 I'm in, so if it does occur I'll say, "Is that a
19 yes or no," just so we have a clean record if we
20 have to look back. I'm not trying to be a jerk;
21 I just want to make sure we have a clean record.
22 Okay?

23 A. Yes.

24 Q. Along those same lines, and you're doing a great
25 job right now, if you continue to let me finish

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1 my complete question before providing a response,
2 again, we don't want her to pull her hair out and
3 try to figure out two people talking at the same
4 time. That can be very difficult to take down.

5 I don't anticipate this taking very long at
6 all but if you need a break for any reason, go to
7 the bathroom, talk with your attorney, get a
8 drink of water, don't hesitate to ask. I'll
9 gladly accommodate that. I only ask that you
10 answer the question that is currently pending if
11 there is a question pending; fair?

12 A. Fair.

13 Q. Ready to start?

14 A. Yes.

15 Q. What is your name for the record?

16 A. Sharde, S-H-A-R-D-E, Perkins, P-E-R-K-I-N-S.

17 Q. Middle name?

18 A. Shanaya.

19 Q. Can you spell that for me?

20 A. S-H-A-N-A-Y-A.

21 Q. Have you been known by any other names?

22 A. No.

23 Q. What is your date of birth?

24 A. February 2nd, 1990.

25 Q. So you had a birthday last month?

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1 A. Yes.

2 Q. Happy belated birthday.

3 A. Thank you.

4 Q. Where were you born?

5 A. Cleveland, Ohio.

6 Q. Have you lived in the Northeast Ohio area your
7 entire life?

8 A. Yes.

9 Q. Let's go off the record briefly for your Social
10 Security number.

11 - - - -

12 (Off the record.)

13 - - - -

14 Q. We briefly went off for your Social Security
15 number. That is in case this gets filed with the
16 court down the line, that that is not public
17 knowledge. What is your current address?

18 A. 326 Girard, G-I-R-A-R-D, Avenue N.E., Canton,
19 Ohio 44704.

20 Q. How long have you lived at the 326 address?

21 A. I've lived there a year-and-a-half now.

22 Q. Is it fair to say at the time of this accident
23 we're here for today you were living at the 326
24 address?

25 A. No.

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1 Q. Where did you live before that?

2 A. I lived at the 1224 15th Street address.

3 Q. Is that Canton, Ohio as well?

4 A. Yes.

5 Q. Do you recall the zip code?

6 A. 44703.

7 Q. So at the time of the accident you were living at
8 the 1224 address?

9 A. Yes.

10 Q. And who were you living with at the time of the
11 accident?

12 A. Myself.

13 Q. So you were living alone?

14 A. Yes.

15 Q. Who do you currently live with at the Girard
16 address?

17 A. Myself.

18 Q. Do you have any children?

19 A. Two.

20 Q. What are their names and ages?

21 A. The oldest one his name is Darius Perkins.

22 Q. Can you spell it?

23 A. D-A-R-I-O-U-S, Perkins, P-E-R-K-I-N-S, and the
24 other one his name is Dasani Perkins.

25 D-A-S-A-N-I, Perkins, P-E-R-K-I-N-S.

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1 Q. How old is Dasani?

2 A. He is two years old.

3 Q. And Darious?

4 A. He is eight years old.

5 Q. Have you ever made a claim for Workers'
6 Compensation?

7 A. No.

8 Q. Have you ever made a claim for Social Security
9 Disability?

10 A. No.

11 Q. Do you have any military experience?

12 A. No.

13 Q. Are you currently married?

14 A. No.

15 Q. Do you currently have health insurance?

16 A. Yes.

17 MR. CANTU: Objection. You can
18 answer.

19 Q. Who is that through?

20 A. Medicaid.

21 Q. What's the highest level of education you
22 completed?

23 A. High school.

24 Q. What high school did you graduate from?

25 A. McKinley.

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1 Q. That would be Canton McKinley?

2 A. Yes.

3 Q. What year did you graduate?

4 A. 2008.

5 Q. Any education or training after you graduated
6 from Canton McKinley?

7 A. Yes.

8 Q. What would that be?

9 A. It would be like I took a med deligation class.

10 Q. Took a what?

11 A. Med deligation class to pass meds.

12 Q. To pass medication?

13 A. Yes. Then I did a STNA.

14 Q. Where did you take those classes?

15 A. I took them in Canton.

16 Q. Was it at a specific --

17 A. Yes. It was ACE Academy.

18 Q. Are you currently employed?

19 A. Yes.

20 Q. Who are you employed with?

21 A. RES Care.

22 Q. How long have you been with RES Care?

23 A. Four months now.

24 Q. What do you do for them?

25 A. Direct care, transportation.

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1 Q. Are you making a claim for lost wages as a result
2 of injuries from this accident?

3 A. Yes.

4 Q. Do you want to go off the record and ask your
5 attorney?

6 MR. CORBEY: Let's go off.

7 - - - - -

8 (Thereupon a discussion was had off the record.)

9 - - - - -

10 MR. CORBEY: Back on the record.

11 Q. Before we went off the record we were talking
12 about lost wages. So, just to make sure that
13 we're all on the same page, are you making a
14 claim for lost wages as a result of injuries from
15 this accident?

16 A. Yes.

17 Q. How much -- do you get paid hourly or salary with
18 RES Care?

19 A. Hourly.

20 Q. How much per hour?

21 A. \$9.16.

22 Q. Where did you work before RES Care?

23 A. Peak Group Home.

24 Q. Is that P-E-A-K?

25 A. Uh-huh.

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1 Q. Group Home?

2 A. Yes.

3 Q. What did you do for Peak Group Home?

4 A. Direct care as well.

5 Q. How long did you work there?

6 A. I worked there for like six months.

7 Q. How much did you make there?

8 A. \$9.00 an hour.

9 Q. Why did you leave Peak Group Home?

10 A. Because of the accident that happened that took
11 place.

12 Q. So you were working at Peak Group Home at the
13 time of this accident?

14 A. Yes.

15 Q. And you said you left because of the accident.
16 What specifically because of the accident? Was
17 it your injuries? Was it the time? Was it the
18 treatment?

19 A. Transportation.

20 Q. So you had transportation issues getting to work?

21 A. Yes.

22 Q. Was that due to your vehicle being --

23 A. Crashed?

24 Q. Yes.

25 A. Yes.

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1 Q. Was that something where you were terminated from
2 Peak Group or did you just leave?

3 A. I was terminated because of that and that I
4 didn't have transportation.

5 Q. Did they specifically tell you that it was
6 because you did not have transportation or
7 that -- strike that.

8 Did they specifically tell you when they
9 terminated you that it was because you were not
10 attending work?

11 A. No.

12 Q. Did they give you any specific reason?

13 A. Because I needed a vehicle for work. I needed a
14 vehicle for work since it was like a direct care
15 setting and you have to transfer the clients
16 around.

17 Q. So you needed a mechanism to take a client from
18 Point A to Point B --

19 A. Yes.

20 Q. -- and you didn't have that because of the
21 accident?

22 A. Yes.

23 Q. When you did work at Peak Group Home was that
24 something that you transported patients on a
25 daily basis? Was that a weekly basis?

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1 A. Daily basis.

2 Q. Where did you work before Peak Group Home? If
3 you don't remember it's okay.

4 A. I don't remember.

5 Q. Do you know where you worked at at all prior to
6 Peak Group Home? It's okay if you don't. I
7 don't want you to guess.

8 A. Okay. I can't remember the name of it but I know
9 I worked in Akron.

10 Q. Was it a similar type job?

11 A. It was a nursing home.

12 Q. Did you transport people at the nursing home as
13 well?

14 A. No.

15 Q. Why did you leave the nursing home job?

16 A. Because of the distance.

17 Q. Do you recall how much you made at the nursing
18 home job?

19 A. \$10.50 an hour.

20 Q. Going back to Peak Group Home did you miss any
21 opportunities for promotions because of this
22 accident? I know you were terminated but prior
23 to that point?

24 A. No.

25 Q. And how much time are you claiming that you lost

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1 at Peak Group Home?

2 A. I had lost like a month and a half.

3 Q. And how many hours would you typically work a
4 week?

5 A. I only worked like 40 hours a week.

6 Q. Would you occasionally do overtime? Was that
7 offered?

8 A. Yes.

9 Q. Did you usually do overtime?

10 A. I would only do like eight hours of overtime.

11 Q. Was that paid at time and a half?

12 A. Yes.

13 Q. So did it take you a month and a half to get a
14 new car?

15 A. Yes.

16 Q. How long before you got fired or let go at Peak
17 Group was it until you started at RES Care?

18 A. Probably January.

19 Q. Was it a couple days? A couple weeks? A month?

20 A. A month.

21 Q. During that time where you worked at Peak Group
22 Home how long did you work there when you didn't
23 have your vehicle that was involved in this
24 accident? You don't have to give me the exact.
25 Was it a couple days? Was it a week? A month?

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1 A. A month.

2 Q. So how were you able to continue your job duties
3 without a car for that month?

4 A. I relied on my mom.

5 Q. So you used your mom's car?

6 A. Yes.

7 Q. Were you able to use your mom's car every day for
8 that month that you needed to?

9 A. Yes.

10 Q. So from your employer's standpoint you had a car,
11 correct, that you were able to do your job? It
12 was just your mom's car?

13 A. It was just my mom's car. We had to basically
14 rotate back and forth or she had to take me to
15 work or the days that she was off she would let
16 me use her car. That way.

17 Q. So from your employer's standpoint you had a car.
18 It just wasn't your car and you were able to
19 drive patients; correct?

20 A. Yes.

21 Q. Previously you testified that they let you go
22 because you didn't have a car. Is that accurate?

23 A. It's accurate.

24 Q. You were still able to do your job and take the
25 patients. It was obviously inconvenient for you

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1 and your mother but you still had a vehicle
2 throughout that time?

3 A. I wouldn't say I had a vehicle because it wasn't
4 mine.

5 Q. Right, but you were able to use a vehicle at work
6 for that month period after the accident that you
7 were still working at Peak Group Home; correct?

8 A. No, not there, but at different places.

9 Q. Would that be RES Care?

10 A. Yes. Until I got me a car.

11 Q. I'm a little confused. Initially you said you
12 got let go at Peak Group Home because you did not
13 have a vehicle and you had to transport your
14 patients from Point A to Point B?

15 A. Right.

16 Q. And then you testified that you would use your
17 mom's vehicle and you would kind of pass it off
18 as obviously inconvenient but you had a vehicle
19 for that month period while you were at Peak
20 Group. It was just your mom's vehicle. It was
21 not yours. So did you have your mom's vehicle at
22 Peak Group Home --

23 A. No.

24 Q. -- to use?

25 A. It was not -- not the whole time but it would be

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1 like maybe a couple of times, not for the whole
2 period of time I was working there.

3 **Q. How long did you not have it for?**

4 A. I had it -- like I didn't have it for like a
5 month so that's why I was let go.

6 **Q. So you didn't have a car at all for a month and
7 that was the reason you were let go?**

8 A. Yes.

9 **Q. So you did not use your mom's vehicle at all?**

10 A. Maybe a couple times, maybe a couple of times and
11 that was it.

12 **Q. You just weren't able to use it consistently
13 enough?**

14 A. Yes, because we were rotating back and forth.

15 **Q. Let's talk about the day of the accident. Do you
16 remember what the weather was like that day?**

17 A. It was nice and warm that day.

18 **Q. Were there any adverse conditions? Was it
19 raining? Snowing?**

20 A. No, sir.

21 **Q. Was it dark?**

22 A. No. It was clear as day. It was like more in
23 the daytime and not that late.

24 **Q. The police report, and before I get into it, now
25 and then they are wrong and your attorney and I**

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1 weren't there so I want to make sure that these
2 are accurate, the police report indicates that
3 the accident happened on a Wednesday. Does that
4 sound accurate?

5 A. Yes.

6 Q. On April 27th, 2016, a little after 6:00 in the
7 afternoon. Does that sound right?

8 A. It was 6:00 in the afternoon but it was still sun
9 out, nice, warm.

10 Q. And then the police report indicates it happened
11 in Jackson Township at the intersection of Fulton
12 Drive and Frank Avenue; is that correct?

13 A. That's correct, yes.

14 Q. What type of vehicle were you driving at the time
15 of the accident?

16 A. I was driving a black Ford Focus.

17 Q. Was that vehicle titled in your name?

18 A. Yes, it was.

19 Q. How long had you had that vehicle?

20 A. I had that vehicle over a year and a half.

21 Q. Do you remember what type of vehicle my client
22 was driving?

23 A. Which one?

24 Q. Mr. Smith.

25 A. Oh, he was driving a pickup truck, a red pickup

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1 truck.

2 **Q. The police report has it as a Dodge Dakota.**

3 A. Yeah, it was a red Dodge Dakota. It was pickup
4 truck.

5 **Q. Either way it was a truck. Had you consumed any**
6 **alcohol or illegal drugs within 24 hours of this**
7 **accident?**

8 A. No, sir.

9 **Q. Where were you going?**

10 A. I was going to the movies before this happened,
11 trying to get there.

12 **Q. Do you remember what movie?**

13 A. I was trying to go to Tinsel Town.

14 **Q. Who were you going to the movies with?**

15 A. I was going to take my son to the movies.

16 **Q. And that would be the son that was involved in**
17 **this accident; correct?**

18 A. Yes.

19 **Q. Where were you coming from?**

20 A. Can you give me a second? I'm just trying to
21 remember that.

22 **Q. No problem.**

23 A. Okay. Yeah. I was coming from his school that
24 day.

25 **Q. So you picked him up from school then you were**

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1 going to head to the movies?

2 A. Yes.

3 Q. Which movie theatre?

4 A. Tinsel Town.

5 Q. Oh, it's called Tinsel Town movie theatre?

6 A. Yes.

7 Q. Sorry. I'm not from around here. Do you
8 remember what movie you were going to see at
9 Tinsel Town?

10 A. A kid movie. I don't remember what movie but I
11 just know we were going to go see something.

12 Q. It wasn't a rated R movie or anything like that
13 that you were going to show him?

14 A. No.

15 Q. Can you describe the accident for me in your own
16 words?

17 A. The accident was very terrifying. I can still
18 remember it in the back of my head.

19 Q. How did the accident happen?

20 A. The accident happened when I was facing traffic
21 in the turn lane. My car wasn't going in motion,
22 and in front of me was a lady that was on the
23 opposite side, but the yellow light, it was a
24 yellow light and the guy he failed to stop and
25 wait for the light to turn green, and she end up,

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1 the lady that was behind him, she end up hitting
2 the back of his car, did a 360, then hit the
3 front of my car and then his spun out of control
4 and he hit me on my left driver's side.

5 **Q. So you were hit by two separate vehicles?**

6 A. Yes, I was hit by the both of them.

7 **Q. So you were waiting to turn left?**

8 A. Yes, but my light was still red and I was already
9 in traffic. I was in the turning lane but I had
10 traffic behind me and traffic was already still
11 going in motion.

12 **Q. So your light was red?**

13 A. Yes.

14 **Q. So you were sitting there waiting for your light
15 to go?**

16 A. Yeah. The car was never in motion.

17 **Q. And then another vehicle that was coming towards
18 you in oncoming traffic; is that correct?**

19 A. Yes. This is me. Their light is turning yellow
20 and she was already trying to get in this lane
21 but he was flying, Wyatt Smith, he was flying.
22 His light was still yellow and he didn't wait so
23 that's why there was like a collision in between
24 her and him first, and then she had hit my front
25 driver's side and then he spun out of control.

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1 Q. So my client in the truck went through the yellow
2 light and the other vehicle was trying to turn
3 left at the yellow light; is that correct?

4 A. Yes.

5 Q. And then that collision caused both vehicles to
6 hit your car?

7 A. Yes.

8 Q. Did they hit separate sides of your car?

9 A. Yes. The lady she hit the front of my car and
10 then Wyatt Smith he hit my left driver's side
11 which would have been the door, smashing the door
12 in.

13 Q. So the driver's portion of the front part of the
14 car?

15 A. Yes.

16 Q. After the impact itself were you able to exit the
17 vehicle under your own power?

18 A. I had to wait until the police came to the scene
19 because there were cops. I had called the cops.
20 She called the cops. He called the cops. I had
21 to sit there and wait until the cops got there to
22 take the different parties' information; and then
23 the guy who didn't wait for the light to turn, he
24 kind of got cited. Her car got towed because it
25 was really totalled and she couldn't drive the

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1 car. Mine was still drivable but it was still to
2 the point where I couldn't drive it on the road,
3 so.

4 **Q. When you say you couldn't drive it on the road**
5 **does that mean it was unsafe?**

6 A. Yeah. And the front headlight was out and the
7 side door was dented in so I would have got a
8 ticket if I were to keep driving the car.

9 **Q. Were you able to continue on to see the movie?**

10 A. No.

11 **Q. Where did you go after the impact?**

12 A. I went to the hospital.

13 **Q. Did you take your son with you?**

14 A. Yes.

15 **Q. I'll move back to the actual impact itself. Did**
16 **any part of your body strike the interior of the**
17 **vehicle upon impact?**

18 A. Yes. I hit my head on the steering wheel.

19 **Q. What part of your head?**

20 A. The front part.

21 **Q. You're pointing to your forehead?**

22 A. Yes. The front part of my forehead.

23 **Q. Anything else?**

24 A. My back and my neck as well.

25 **Q. Would that be on the back part of the seat and**

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1 the headrest?

2 A. Yes.

3 Q. Did you break any personal items in the vehicle
4 upon impact, cell phone, glasses, anything like
5 that?

6 A. No.

7 Q. So did you exit your vehicle when the police came
8 or were you able to exit prior to the police
9 getting to the scene?

10 A. I had to exit my vehicle because he had us all
11 get out of our car.

12 Q. Who is "he"?

13 A. Well, the officer.

14 Q. So you waited for the officer to come to the
15 scene before you got out of your car?

16 A. Yes.

17 Q. Did you have any conversations with any of the
18 parties at the scene before the police arrived?

19 A. Yes.

20 Q. What happened during those conversations?

21 A. The lady she just asked me if I was okay and ...

22 Q. Do you remember what you told her?

23 A. I had told her that I wasn't, because like I hit
24 the front of my head. That's when we had all
25 waited, then the other party he was pretty much

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1 just waiting for the cops to get there, too, so
2 we just waited until the cops came and just take
3 our information and get a brief of what happened
4 at the ...

5 **Q. So you had a conversation with the female driver**
6 **of the other vehicle but not the male driver of**
7 **the other vehicle?**

8 A. No. Like he didn't really say nothing. Like the
9 only thing I just know that he was at the
10 accident and I just pretty much talked to the
11 lady and the officer who was taking the report.

12 **Q. Any conversations with any of the parties after**
13 **the police arrived?**

14 A. No.

15 **Q. So you had a little bit of a conversation with**
16 **the female driver just asking if everything was**
17 **okay?**

18 A. Yes.

19 **Q. And then you all waited for the police to come**
20 **and you all provided your statements to the**
21 **police officer?**

22 A. Yes.

23 **Q. You testified you were able to drive your car but**
24 **it wasn't safe; correct?**

25 A. Yes.

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1 Q. How far were you able to drive your car? Did you
2 make it home?

3 A. I went to the hospital first.

4 Q. You were able to drive your car to the hospital?

5 A. Yes.

6 Q. Then we'll get into the treatment that you
7 received at the hospital in a little bit, so I'm
8 more concerned about the actual vehicle itself
9 right now.

10 A. Okay.

11 Q. So after you were done at the hospital were you
12 able to drive your vehicle home?

13 A. Yes.

14 Q. And then what did you do with the car? Were you
15 able to drive it once you got it home and all, or
16 did you just leave it at home?

17 A. It wasn't drivable so what I did I ended up
18 having to -- I couldn't take it with me anywhere
19 because I would have to get a ticket, but
20 because -- well, I took the car home.

21 Q. So you took the car home after you went to the
22 hospital; correct?

23 A. Yes.

24 Q. And then did you just leave the car at home?

25 A. No.

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1 Q. What did you do with the car?

2 A. Well, you know, what I did --

3 Q. Sure.

4 A. -- yes, I left the car home but I didn't really
5 do too much with the car because the damage that
6 it was in.

7 Q. I'm trying to get at, you testified the car was
8 not drivable but you were able to drive it enough
9 to get it home from the hospital?

10 A. It wasn't that drivable but ...

11 Q. It wasn't safe?

12 A. It wasn't safe to be on the road.

13 Q. But the car could move; right? The car was not
14 safe to drive and you probably would have gotten
15 a ticket if you drove it but the car would
16 actually drive?

17 A. Yes. Because it was very smashed up in the front
18 so I would have got cited for those conditions.
19 It wasn't like to be in a condition where like
20 snow ...

21 Q. Okay. I believe from the records it looks like
22 you got out of the hospital pretty late, almost
23 into the next morning, so you drove the vehicle
24 home the morning of April 28th; correct?

25 A. Yes.

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1 Q. Did you drive that car at all the next day on
2 April 28th other than going home from the
3 hospital?

4 A. No. I couldn't drive it.

5 Q. Did you drive that car within that week at all?

6 A. No.

7 Q. So is it fair to say once you got the car home
8 from the hospital you did not drive that vehicle?

9 A. Yes.

10 Q. And then there lies the difficulty at work that
11 you didn't have a functioning car; correct?

12 A. Yes.

13 Q. Do you have any pictures of your vehicle?

14 A. I don't have any pictures of the car because at
15 the time I didn't take pictures. The officer did
16 from the Jackson Township Police of all of our
17 vehicles but I can't seem to get that, so.

18 Q. Do you recall what the property damage was, the
19 estimate to get it fixed?

20 A. I know for my estimate with the car, the work
21 that I put into it would have been \$3,000 for the
22 vehicle and then the work that I put into it
23 would have been at least like \$2,500.

24 Q. So that would be a total of like \$5,500 to fix
25 the vehicle? What do you mean the work you put

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1 in? Did you do the fixing personally?

2 A. Yeah, I did the fixing because I installed a
3 radio in there that couldn't even work, and then
4 for the actual work I had to do something with
5 the transmission and I had to do something with
6 the actual engine itself.

7 Q. Did you fix the vehicle yourself or did a body
8 shop fix it?

9 A. I didn't fix it myself but a body shop fixed it
10 and they charged me for the car.

11 Q. Do you remember how much they charged you?

12 A. It was -- the first portion of it was -- it came
13 up to like \$1,700 and then the other portion for
14 like the, um ...

15 Q. If you don't remember, it's okay.

16 A. I was trying to remember the other part that got
17 fixed but I just know it was like, um ...

18 Q. So there was more than just cosmetic damage?

19 A. Yeah, there was more than that.

20 Q. So it was more than just damage to the outside of
21 the vehicle. There was damage to the engine, the
22 transmission, and the radio?

23 A. Yes.

24 Q. Was that vehicle repaired to its pre-accident
25 condition?

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1 A. I repaired it myself, yes.

2 Q. You did some repairs yourself on top of what the
3 body shop did?

4 A. Yes.

5 Q. Do you remember what repairs you did yourself?

6 A. I had to get like different -- new tires before I
7 bought the vehicle. Well, before, because the
8 car was a -- I forget.

9 Q. Your car?

10 A. Yeah, my car. I had to do like multiple repairs
11 on the car before.

12 Q. Before this accident or after this accident?

13 A. Well, after -- I mean not after, but before this
14 accident. Before then.

15 Q. Do you remember what you had to do after this
16 accident?

17 A. I like -- I really -- I had to wait. I didn't do
18 nothing to the car after the accident because it
19 was too much already just totalled so there was
20 no point in fixing it.

21 Q. So is it fair to say you did repairs to the
22 vehicle before this accident --

23 A. Yes.

24 Q. -- that have nothing to do with this?

25 A. That had nothing to do with this.

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1 Q. Then you may have contemplated doing some repairs
2 yourself after the accident but you didn't do it
3 because of the extent of the damage to your car?

4 A. Yes.

5 Q. Do you still have this vehicle now?

6 A. No. It's gone. It's totalled, gone.

7 Q. Do you recall if there was any pre-existing
8 damage to that vehicle, that Ford Focus, before
9 this accident?

10 A. No.

11 Q. Were you able to see the accident play out in
12 front of you or was it more of a surprise?

13 A. For me I would say it was like a surprise but
14 since I was in front ...

15 Q. I should clarify. Obviously no one is expecting
16 to get hit by another car so it's always a
17 surprise, but is it something that you had no
18 idea until the actual impact that you were going
19 to be in an accident or did you see it play out?

20 A. Oh, no. It was a surprise to me because I was
21 trying to get to the movies.

22 Q. Did you see the cars before they actually hit
23 your car?

24 A. I seen the cars but I had no idea what they were
25 trying to do. I was just more focused on trying

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1 to get to the movies, and like it was just a
2 surprise to me because like I wasn't expecting
3 that. I was already in the turning lane then
4 this accident just occurred.

5 Q. So is it fair to say you saw them for a brief
6 second before the impact --

7 A. Yes.

8 Q. -- or did you see them further out?

9 A. Further out.

10 Q. So you saw it play out in front of you. You
11 obviously weren't expecting to get hit --

12 A. Yes.

13 Q. -- but you saw --

14 A. How.

15 Q. -- the exchange, the two vehicles hit, and then
16 saw them spin towards you? Is it fair to say you
17 saw the two vehicles collide and come towards
18 you?

19 A. Yes. They couldn't control themselves.

20 Q. Was your car moved out of place due to those
21 impacts?

22 A. Yes.

23 Q. How would you classify the impact that occurred
24 to your car? I'll break them up because
25 obviously there are two separate impacts;

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1 correct?

2 A. Yes.

3 Q. This would be the impact with the female driver.

4 Would you classify that impact as minor?

5 Moderate? Heavy? Severe?

6 A. It was heavy.

7 Q. And how would you describe the impact with the
8 male driver, the truck?

9 A. It was heavy as well.

10 Q. So both impacts jolted you?

11 A. Yes.

12 Q. I noticed you testified previously that the male
13 driver in the pickup truck was driving fast?

14 A. Yes.

15 Q. How do you know he was driving fast? Was that
16 something that you just observed or did you
17 see --

18 A. It was obvious because traffic was already moving
19 fast and he was trying to rush and get through
20 that light.

21 Q. Make sure I finish my question first so we don't
22 drive her nuts. So can you say that again for
23 me? You observed him going fast?

24 A. Yes.

25 Q. How did you know he was going fast?

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1 A. Because the light was already yellow.

2 Q. So it was your observation that he sped up to get
3 through the yellow light?

4 A. Yes.

5 Q. Did you see his vehicle actually speed up?

6 A. Yes.

7 Q. Were there any other cars around him at that
8 point that you could reference off of, or is this
9 just based on your observation of his truck?

10 A. That was just based on my observation of the
11 truck.

12 Q. Obviously there were a couple other vehicles
13 involved in this accident but other than the
14 female driver, the male driver, yourself and your
15 son, were there any other witnesses to the
16 accident that stayed at the scene?

17 A. No.

18 Q. I know you testified previously that right after
19 the accident you drove your vehicle with your son
20 to the emergency room; correct?

21 A. Correct.

22 Q. What emergency room is that?

23 A. Aultman Hospital.

24 Q. What injuries are you claiming as a result of
25 this accident?

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1 A. More of my head injury, my neck, and my back
2 because those were the things that jerked in the
3 car and I hit my front and the back of my neck
4 and my back, period.

5 **Q. When you say your head is that because you struck**
6 **your head on the steering wheel?**

7 A. Steering wheel, yes, and I jerked. I'm claiming
8 those injuries because those were the injuries
9 that happened in the car and I constantly have
10 pain with.

11 **Q. So I'm going to go through each one of those**
12 **separately. The neck is pretty explanatory.**
13 **It's the back part of your neck. With the head,**
14 **you testified that you hit your head on the**
15 **steering wheel?**

16 A. Yes.

17 **Q. Was there a contusion, a bruise on your forehead?**

18 A. There was like a red mark, yeah, and then I
19 busted my lip.

20 **Q. You busted your lip on the steering wheel?**

21 A. Yes, because of the impact.

22 **Q. So when you said you hit your forehead, there was**
23 **a red mark, was it bleeding?**

24 A. It wasn't bleeding but I ended up catching --
25 that day I ended up getting a knot on my forehead

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1 because of the impact.

2 Q. When your said you busted your lip was that
3 something where your lip just swelled up or did
4 it bleed?

5 A. It did bleed. I had blood on my steering wheel.

6 Q. When you went to the hospital did they have to
7 stitch up your lip?

8 A. No. They just gave me an ice pack.

9 Q. Then you also mentioned injuries to your back.
10 Would that be your low back? Mid back? Upper
11 back? Whole back?

12 A. The whole thing, the whole back.

13 Q. So I'll start with the neck and I'll go through.
14 On a scale of zero to 10, zero being no pain and
15 10 being the worst pain you ever felt, how
16 was --

17 A. Ten was being the worst pain.

18 Q. You have to wait for my question. You don't want
19 me to switch it around on you. What was the
20 worst pain, and I want that scale, the worst pain
21 you felt at any particular point, what was that
22 on a scale of zero to 10 --

23 A. Ten.

24 Q. -- for your neck? It was a 10?

25 A. 10.

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1 Q. When did you first start feeling neck pain?

2 A. After the accident.

3 Q. So you felt it at the scene?

4 A. Uh-huh, yes.

5 Q. And on that same scale how would you describe
6 that pain at the scene?

7 A. A 10.

8 Q. So it started right away and it was excruciating
9 at that point?

10 A. Yes.

11 Q. We'll move to your forehead. How would you
12 describe that on a scale of zero to 10?

13 A. A 10.

14 Q. And how about the lip?

15 A. A 10.

16 Q. How about your whole back?

17 A. A 10.

18 Q. Is it fair to lump your back into the same
19 category, that it felt the same? Was it all a
20 10?

21 A. It was all a 10 because my body was not used to
22 being jerked back and forth in a collision.

23 Q. So your low back wasn't worse than your mid back
24 or your mid back worse than your upper back, it
25 all hurt the same?

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1 A. Yes.

2 Q. It was all a 10?

3 A. It was all a 10.

4 Q. When did you first start feeling the pain in your
5 back?

6 A. After the accident.

7 Q. At the scene as well?

8 A. Yes.

9 Q. Then I imagine obviously with your lip hitting
10 the steering wheel that occurred at the scene as
11 well?

12 A. Yes.

13 Q. Do you recall if the police officer asked you if
14 you were injured?

15 A. Yes.

16 Q. Do you remember what you told him?

17 A. I told him yes.

18 Q. Do you remember if he asked you if you needed an
19 ambulance?

20 A. Yes.

21 Q. What did you tell him?

22 A. I told him I was hesitating to go because I
23 wasn't sure -- I told him, I told the officer,
24 no, I didn't want to get on an ambulance because
25 I was thinking about that bill so, but I took

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1 myself.

2 Q. So instead of taking an ambulance and incurring
3 that bill you drove yourself and your son to the
4 emergency room?

5 A. Yes.

6 Q. Have you taken an ambulance to a hospital within
7 the last 10 years?

8 A. No, never.

9 Q. Are you aware of how much an ambulance bill is?

10 A. Oh, yes.

11 Q. How do you know how much an ambulance bill is?

12 MR. CANTU: Objection. You can
13 answer.

14 A. Because I always hear them saying like sometimes
15 they don't -- certain insurance doesn't cover it
16 but I was just aware because I wasn't sure if I
17 was covered or not.

18 Q. But you don't know how expensive it actually is?
19 You just know it's a bill you would have
20 incurred?

21 A. I just know it's a high bill. It's not cheap.

22 Q. Every now and then, and I'll preface this
23 question because it seems like an odd question at
24 first, but every now and then I'll have somebody
25 tell me a reason why they would not be honest

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1 with their doctors at the emergency room or
2 chiropractors or anywhere. Do you have any
3 reason why you would not be 100 percent truthful
4 to the people that took care of you in the
5 medical realm of things? Or were you honest --

6 A. I was honest.

7 Q. -- about your injuries?

8 A. Yes, I was honest.

9 Q. So you were honest about all your injuries?

10 A. Yes.

11 Q. There was no reason to cover anything up?

12 A. Yes.

13 Q. Do you have a primary care physician?

14 A. No.

15 Q. So if you're sick where do you go?

16 A. I always go to Aultman Hospital.

17 Q. So you initially went to Aultman Hospital on the
18 day of the accident. What type of treatment did
19 you receive there?

20 A. They pretty much gave me an ice pack, gave me a
21 prescription.

22 Q. Do you remember what the prescription was for?

23 A. It was like muscle relaxer pills.

24 Q. Do you recall if you filled that prescription?

25 A. Yes, I did.

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1 Q. Do you know where you filled that prescription?

2 A. At Rite-Aid.

3 Q. Do you know what street that Rite-Aid is on?

4 A. Mahoning.

5 Q. Did you take all of the muscle relaxers?

6 A. Yes.

7 Q. So they gave you an ice pack for your lip, I
8 imagine?

9 A. Yes.

10 Q. They prescribed you muscle relaxers. Did they do
11 anything else in the emergency room?

12 A. I believe they did an X-ray on me and told me to
13 follow up with a doctor.

14 Q. I'm not trying to trick you, the records I have
15 show there was a CT done on your neck?

16 A. Yes.

17 Q. Do you remember that?

18 A. Yes.

19 Q. Do you remember if anybody went over the results
20 of the CT scan?

21 A. Yes.

22 Q. Do you remember what they told you?

23 A. Yes. Basically to follow up with a doctor.

24 Q. Do you remember who they told you to follow up
25 with, if anyone?

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1 A. Anyone.

2 Q. So they just said follow up?

3 A. Yes, follow up with any doctor that I pretty much
4 can find.

5 Q. Other than following up with a doctor and giving
6 you the prescription did they give you any other
7 recommendations?

8 A. No.

9 Q. Do you remember if they took you off work?

10 A. No. Well, I wasn't taken off by them.

11 Q. I know you struck your head on the steering
12 wheel. Did you lose consciousness due to that?

13 A. I was confused that day, like I was pretty much
14 like in a shock.

15 Q. Do you remember if you blacked out?

16 A. Yeah, I did blackout.

17 Q. Was that at the scene after you struck your head?

18 A. Yes.

19 Q. Were you still in the vehicle, do you recall,
20 when you came to?

21 A. Yes.

22 Q. So you went to Aultman emergency room. You drove
23 your vehicle home where you didn't drive it ever
24 again, and you filled the muscle relaxers up at
25 Rite-Aid on Mahoning. Then what is the next

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1	thing that you did?
---	---------------------

2 | A. I ended up getting treated by the chiropractor.

3 Q. Do you remember which chiropractic facility that
4 was?

5 A. It was Kent Injury Center.

6 Q. Do you remember how long after you left Aultman
7 Hospital until you began at Canton Injury Center?

8 A. I didn't start with them until like a week after.

9 Q. How were you feeling during that week after you
10 went to the emergency room but before you started
11 at the chiropractor?

12 | A. I was still feeling worse.

13 Q. I know you described previously that your pain
14 was a 10 out of 10.

15	A. Yes.
----	---------

16 Q. When you started at the chiropractor was your
17 pain still a 10 out of 10, or had it decreased a
18 little bit?

19	A. It decreased.
----	------------------

20 Q. Decreased in all areas or just --

21 A. It decreased in all areas like.

22 Q. What made you go to Canton Injury Center?

23 MR. CANTU: Objection.

24 A. Well, because I heard some good recommendations
25 from other people that got treated there.

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1 Q. Friends? Family?

2 A. Friends.

3 Q. Coworkers?

4 A. Friends.

5 Q. What are those friends' names?

6 A. Who told me that? Casandra.

7 Q. Do you know Casandra's last name?

8 A. Wisdom.

9 Q. Winston?

10 A. Wisdom.

11 Q. Can you spell that for me?

12 A. It's C-A-S-A-N-D-R-A, W-I-S-D-O-M.

13 Q. Did anybody else give a good recommendation other
14 than Casandra Wisdom?

15 A. No. That would be it.

16 Q. Did you receive any calls from Canton Injury
17 Center?

18 MR. CANTU: Objection. You can
19 answer.

20 A. No.

21 Q. Do you recall if they offered you any incentives
22 like free rides or free visits?

23 MR. CANTU: Objection.

24 A. No.

25 Q. They didn't say you could come in for a free

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1 first visit or anything like that?

2 A. No.

3 Q. And I don't want to know any conversations you've
4 had with your attorney or anyone from this
5 office. Okay? Did you have an attorney when you
6 went to Canton Injury Center or did you get one
7 after?

8 MR. CANTU: Objection. You can
9 answer.

10 A. I'll be honest, yes.

11 Q. Yes, you had an attorney before you went to
12 Canton or you got one after?

13 A. Can I say something?

14 Q. Sure.

15 A. They withdrew from --

16 MR. CANTU: No. We'll go off the
17 record for a second maybe.

18 MR. CORBEY: Sure.

19 - - - -

20 (Thereupon, a discussion was had off the record.)

21 - - - -

22 MR. CANTU: Just note my objection
23 to the last question.

24 MR. CORBEY: Sure. And could you
25 please read back the question.

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(Thereupon, the requested portion of
the record was read by the Notary.)

A. I had got an attorney but it wasn't nothing with
this case.

**Q. You had an attorney but it had nothing to do with
this case?**

A. Yeah, it was nothing to do with this case.

Q. Was it more of a criminal case?

A. Yes.

**Q. So it's either one way or the other. Did you
have an attorney at Canton Injury Center when you
first treated or did you get one after?**

A. After.

Q. For this case?

A. Yes, for this case.

**Q. When you went to Canton Injury Center did they
provide with you some attorneys?**

MR. CANTU: Objection.

A. No. I provided my own.

Q. So you found your attorney yourself?

A. Yes.

**Q. Can you walk me through that first visit at the
chiropractic office? Did they go over your**

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1 family history, detailed medical history, all
2 that stuff?

3 A. Yes. They were pretty nice. They were trying to
4 get to know me, ask me questions, my background,
5 like how I was feeling and what can they provide
6 for me.

7 Q. Do you recall if they did any X-rays there?

8 A. Yes.

9 Q. Do you know what they did the X-rays on?

10 A. They did X-rays on my neck, my back.

11 Q. Did somebody go over the results of those X-rays
12 with you?

13 A. Yes.

14 Q. Who was that?

15 A. Dr. Peterson.

16 Q. Do you remember what the results were?

17 A. No, I don't remember.

18 Q. I believe you just testified your chiropractor
19 was Dr. Peterson?

20 A. Yes.

21 Q. Did you see Dr. Peterson on every visit?

22 A. Yes.

23 Q. How long did you spend face to face with Dr.
24 Peterson on that first visit?

25 A. Like an hour or two.

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1 Q. Can you walk me through what a typical visit
2 would be like after that first one? I assume you
3 would walk through the doors and sign in. What
4 would happen after that?

5 A. After the sign-in I would pretty much have to
6 wait until he was pretty much done with other
7 clients and for him to do like the hands on.

8 Q. Where he would crack your back?

9 A. Yeah.

10 Q. So Dr. Peterson would crack your back?

11 A. At first I would get the ice pack treatment. I
12 think it's the cool --

13 Q. That'd be the hot or cold packs?

14 A. Yeah, the hot or cold packs and then right after
15 that I would get the hands on.

16 Q. And when you were getting the hot and cold packs
17 did they have electrodes on you that were
18 providing pulses?

19 A. Yes.

20 Q. And was that at the same time you had the hot and
21 cold packs on you?

22 A. Yes.

23 Q. So they did the X-rays, the hot and cold packs,
24 the stim, they cracked your back. Anything else
25 that you recall?

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1 A. No.

2 Q. Did they do a roller bed or a water bed or
3 anything like that?

4 A. Yes, they did that.

5 Q. Which one, or both?

6 A. Both.

7 Q. While you were doing one of the beds would you do
8 the beds on the same visit?

9 A. It would be like a different visit, depending how
10 busy they are.

11 Q. While you were on the beds is that when you got
12 the hot and cold packs and the stim as well?

13 A. Yes.

14 Q. That was all done at the same time then you would
15 go to the doctor for them to crack your back?

16 A. Yes.

17 Q. How long would that process take from when you
18 laid down on the bed and got the hot and cold
19 packs and stim until the doctor was done cracking
20 you back and would send you on your way?

21 A. It would take like an hour depending how busy the
22 place is.

23 Q. When you hit your head, I know you said you lost
24 consciousness a little bit, did you have
25 headaches with that?

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1 A. I had migraines.

2 Q. You had migraines after the accident?

3 A. Yes.

4 Q. And did you have any injuries where pain was
5 going down your legs or your arms?

6 A. It would be like my arms, a little numbness.

7 Q. Any other injuries other than the numbness, the
8 lip, the forehead, the neck and the back?

9 A. No.

10 Q. Then it looks like you also saw another physician
11 as well; is that correct?

12 A. Dr. Jones.

13 Q. Before we get into Dr. Jones, how did you know
14 that you were done treating at the chiropractor?

15 A. Once my pain decreased that is when I know I
16 would be finished with the chiropractor.

17 Q. Was that something you discussed with
18 Dr. Peterson and said, "I'm feeling better. I'm
19 ready to be done"?

20 A. Yes. And then they have to do their checkup to
21 make sure I'm okay.

22 Q. By "checkup" you mean the examination?

23 A. Yes.

24 Q. Did they do that examination on that last visit
25 that you went there?

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1 A. Yes.

2 Q. And then after that examination Dr. Peterson said
3 you're good?

4 A. I'm free to go, yes.

5 Q. When you were done with that last examination
6 were you fully healed or did you still have pain?

7 A. I still had pain a little bit but I fully healed
8 a week later after that because I wasn't all the
9 way healed.

10 Q. You still had residual pain in all areas?

11 A. Just the back part.

12 Q. So your lip was okay at that point?

13 A. Yes, my lip was okay.

14 Q. Forehead was okay at that point?

15 A. Yes.

16 Q. Your neck was resolved at that point?

17 A. Yes.

18 Q. So it was just your back?

19 A. Yes.

20 Q. And I know we described it on the scale from zero
21 to 10 previously and it was a 10 out of 10 at its
22 worst pain; how was it at your last visit before
23 it got fully healed?

24 A. It was like a mild like -- it was okay. Then I
25 ended up having to go back a week later just

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1 because that pain came back.

2 **Q. You went back to the chiropractor's office?**

3 A. Yes. And that's when I ended up -- what did they
4 give me, a shot, and then treatment, and then I
5 was fine.

6 **Q. So I believe you just testified prior to that**
7 **that you were fully healed a week after your last**
8 **treatment at the chiropractor's office?**

9 A. Yes, I was fully healed then I had to come back
10 because that same pain had came back, not like
11 from the top part of my back but like the lower
12 part.

13 **Q. So you were released. You still had a little bit**
14 **of pain?**

15 A. And I had to come back and then right after I got
16 treatment from there, a week out, I was fine
17 right after that because I had ended up getting
18 treatment.

19 **Q. How would you describe the treatment that you**
20 **received at Canton Injury Center?**

21 A. The treatment was excellent and it was great. I
22 really didn't have too many problems from them
23 because they were really nice people.

24 **Q. Did it help your injuries?**

25 A. Yes.

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1 Q. So we'll move to Dr. Jones which would be the
2 shot doctor; correct?

3 A. Yes.

4 Q. How did you end up going to Dr. Jones?

5 A. Well, I ended up going to him because he came
6 there to the chiropractor to see how I was,
7 basically how I was feeling and what injuries I
8 have and to state whether or not, you know, I
9 should be doing certain activities and what type
10 of treatment I should get.

11 Q. Did you ask to see Dr. Jones?

12 A. Well, I wasn't -- I was undecided because I
13 didn't have a primary care doctor but, yes, I
14 did.

15 Q. Did you tell Dr. Peterson that you wanted to see
16 him?

17 A. Yes.

18 Q. How did you know Dr. Jones was a part of Canton
19 Injury Center?

20 A. I knew because of a friend that referred me
21 there.

22 Q. Casandra?

23 A. Yes.

24 Q. Did Casandra see Dr. Jones?

25 A. No. She never saw him but I just heard about the

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1 place.

2 **Q. How would she be able to refer Dr. Jones if she**
3 **never saw him?**

4 A. Well, she never -- the place itself, but she
5 never saw Dr. Jones but I pretty much, you know,
6 heard about the place and I heard about him so
7 that is how I got referred.

8 **Q. But how did you hear about him?**

9 A. The receptionist.

10 **Q. So it wasn't Casandra?**

11 A. No. She referred me there but the receptionist
12 told me about him.

13 **Q. Do you remember what the receptionist said?**

14 A. He's a good doctor. Her name is Sam.

15 **Q. Do you recall if Dr. Jones was in there every**
16 **day?**

17 A. He was in there like once every week or two
18 weeks.

19 **Q. Did he have his own office there that you would**
20 **go into?**

21 A. He had an office there but I don't know where his
22 actual office is at. I would say, yes, he did
23 have an office.

24 **Q. Did he provide you injections?**

25 A. Yes. Two.

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1 Q. Do you remember where they were at?

2 A. My lower back.

3 Q. Do you recall what was in those injections?

4 A. I know that they were muscle relaxers but I'm not
5 for sure what was in it.

6 Q. It looks like he prescribed you a TENS unit. Do
7 you remember that?

8 A. Yes. I have still that.

9 Q. Do you still use it?

10 A. Yes.

11 Q. Did you ask him for a TENS unit?

12 A. Yes.

13 Q. Did he tell you how much a TENS unit cost?

14 A. No.

15 Q. So if I said it was \$500 you would have no idea?

16 A. No.

17 Q. How did you know that there were TENS units to be
18 given away?

19 A. I didn't know that they were given away.

20 Q. You just testified you asked for it --

21 A. I asked for it.

22 Q. -- so how did you know he had it?

23 A. The receptionist.

24 Q. The receptionist said he has a TENS unit that he
25 can give you?

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1 A. Yes.

2 Q. Did you tell the receptionist you needed a TENS
3 unit or some further relief?

4 A. Yes.

5 Q. Is this the same receptionist that told you about
6 Dr. Jones?

7 A. Yes.

8 Q. Do you recall that receptionist's name?

9 A. Sam.

10 Q. Is Sam a male or female?

11 A. She's a female.

12 Q. Other than the injections and the TENS unit did
13 Dr. Jones give you anything else to assist with
14 the pain?

15 A. It was a back brace.

16 Q. Did you ask for the back brace as well?

17 A. Yes, I did.

18 Q. Did he tell you how much the back brace cost?

19 A. No.

20 Q. If I said that back brace was \$1,500 you wouldn't
21 be aware of that?

22 A. No.

23 Q. Do you use the back brace?

24 A. Yes, every once in a while.

25 Q. By every once in a while is that throughout the

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1 day or every other day or every other week?

2 A. Every other week.

3 Q. Did it just not work well or what was the
4 reasoning for not wearing it if you asked for it?

5 A. If I'm in the house and I'm doing chores I would
6 use it.

7 Q. But you didn't use it at work or outside the
8 house?

9 A. No.

10 Q. Is there a particular reason for that?

11 A. Because of what I was wearing.

12 Q. Did Sam, the receptionist, tell you about the
13 back brace as well?

14 A. Yeah. Sam told me about the back brace.

15 Q. Do you recall what she said about the back brace?

16 A. That they pretty much help with your back if you
17 have like, you know, pain and stuff like that.
18 That's what she told me. It was nothing major.

19 Q. Do you recall how many times you saw Dr. Jones?

20 A. I only saw him maybe twice or three times.

21 Q. Did you ever miss an appointment with him?

22 A. No.

23 Q. So if his records said that you "no-showed" for a
24 visit that would be accurate?

25 A. He said I no-showed?

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1 Q. Did not show up for an appointment.

2 A. I was there but we had to reschedule, so, due to
3 me having the appointment.

4 Q. During that first visit with Dr. Jones how long
5 did you spend with him face to face?

6 A. Not even that -- maybe about 15 minutes, 15, 20
7 minutes.

8 Q. Did he go over your family history and your
9 background and all of that stuff or was that
10 something he got from the chiropractor?

11 A. He went over that with me.

12 Q. He went over that with you?

13 A. Yes.

14 Q. Do you remember if he checked your eyes, ears,
15 nose, throat, mouth, all that stuff? Give you a
16 physical?

17 A. Yes.

18 Q. Did he go over the side effects of the injections
19 with you?

20 A. Yes.

21 Q. Do you remember what the side effects were?

22 A. Dizziness, maybe tired a little bit. I mean
23 that's all I remember.

24 Q. Have you ever been hospitalized for more than a
25 day?

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1 A. Yes.

2 Q. What was that for?

3 A. Surgery.

4 Q. What was that surgery on?

5 A. My tonsils.

6 Q. Do you recall what hospital that was at?

7 A. Aultman Hospital.

8 Q. Did you have any pre-existing injuries to your
9 neck before this accident? Have you ever injured
10 your neck before this accident?

11 A. No.

12 Q. So no injuries to the neck even if they healed or
13 didn't heal?

14 A. No. Can you repeat that question?

15 Q. Sure. Have you ever had an injury to your neck
16 before this accident?

17 A. No.

18 Q. So if the ER records said you have chronic neck
19 pain from an accident in 2001 would that be
20 inaccurate?

21 A. That would be inaccurate, yes.

22 Q. Did you have a motor vehicle accident in 2001?

23 A. No.

24 Q. Have you ever had any injuries to your back
25 before this accident?

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1 A. No.

2 Q. So if Dr. Jones' record indicates you have
3 chronic back pain from scoliosis would that be
4 inaccurate?

5 A. Yes, no. Can I --

6 MR. CANTU: Can we go off the
7 record for a second?

8 MR. CORBEY: Sure.

9 - - - -

10 (Off the record.)

11 - - - -

12 MR. CANTU: Back on the record.

13 Q. So before we went off the record we were talking
14 about prior back injuries and you indicated that
15 the medical records with Dr. Jones indicating you
16 had chronic back pain from scoliosis was
17 inaccurate. Is that still your statement?

18 A. No, that is not my statement. Okay, the date was
19 wrong. That is why I got confused.

20 Q. What was wrong?

21 A. The date, but I'll go back to where you said --

22 Q. What do you mean the date was wrong?

23 A. I do have back injury, well, scoliosis, but I was
24 diagnosed with that in 2011 because that was from
25 the accident.

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1 Q. You were diagnosed in 2011 with scoliosis from a
2 motor vehicle accident?

3 A. Yes. The date was just wrong. That's why I was
4 confused.

5 Q. I don't think I threw out any dates with the back
6 pain. I was just asking if you had ever had a
7 back injury before this accident.

8 A. Yes, I did, yes, and that was in 2011.

9 MR. CANTU: There was a 2001 date
10 thrown out.

11 MR. CORBEY: The 2001 was the
12 chronic neck pain that was in the ER
13 records, but thank you for bringing that up
14 just so we make sure we're on the same
15 page.

16 Q. So you're diagnosed with scoliosis in 2011 and
17 you had a motor vehicle accident so I assume to
18 get that diagnosis you had to go to a medical
19 professional?

20 A. Yes.

21 Q. Which medical professional did you see?

22 A. I forget.

23 Q. Did you go to an emergency room?

24 A. Yeah. I had went to the -- I don't know. It was
25 so long ago.

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1 Q. Do you remember if you injured your neck as well
2 in that accident?

3 A. Yes, I did. I had went -- I was treated by a
4 different chiropractor in 2011 from that
5 accident.

6 Q. Do you remember which chiropractor that was?

7 A. Perry Chiropractor.

8 Q. And you said you went to the emergency room, you
9 just don't know which ER?

10 A. Yes.

11 Q. Any other treatment?

12 A. From that year?

13 Q. From the 2001 accident.

14 A. No. I don't remember.

15 Q. So if the ER records indicate that you have
16 chronic back pain and it was a typo, it meant
17 2011, that would be accurate?

18 A. Yes.

19 Q. Did your injuries ever resolve from that 2011
20 accident or did you still have neck and back pain
21 prior to this?

22 A. It had resolved from that.

23 Q. Both your back and neck?

24 A. Yes.

25 Q. Did they resolve after treatment with Perry

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1 Chiropractic?

2 A. Yes.

3 Q. So the medical records indicating that you had
4 prior back and neck pain is not inaccurate but
5 the fact that they say the back and neck pain is
6 chronic is inaccurate, is that your statement?

7 A. I'm confused about this.

8 Q. Do you understand what "chronic" means?

9 A. Yes.

10 Q. Did you have chronic pain after 2011?

11 A. No, I didn't.

12 Q. So that would be inaccurate --

13 A. Inaccurate, yes.

14 Q. -- that you had chronic neck and back pain?
15 Other than Perry Chiropractic and Canton Injury
16 Center have you been to any other chiropractic
17 centers?

18 A. No.

19 Q. What made you not go to Perry Chiropractic for
20 this accident?

21 A. I was unsure. I was undecided, you know, who to
22 talk to or where to go at this time.

23 Q. Other than the motor vehicle accident in 2011 and
24 then the one that we're obviously here for today
25 have you been involved in any other motor vehicle

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1 accidents?

2 A. Yes. One in --

3 Q. Was it before 2011 or was it in between?

4 A. Oh, no. There wasn't another accident.

5 Q. There was no other accident other than the one in
6 2011 and the one in 2016 that we're here for
7 today?

8 A. Yes.

9 Q. In the accident in 2011 did you hire an attorney
10 for that?

11 MR. CANTU: Objection. You can
12 answer.

13 A. No, I didn't.

14 Q. Did you get a settlement from that accident?

15 MR. CANTU: Objection. You can
16 answer.

17 A. Yes.

18 Q. And then as we sit here today are you on any
19 medication that would make it difficult for you
20 to remember?

21 A. No.

22 Q. Have you been involved in any other accidents
23 whether it was as a pedestrian walking, whether
24 you were playing a sport, anything like that
25 where you were injured?

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1 A. No.

2 Q. Have we talked about all the health care
3 professionals that you've received treatment from
4 as a result of injuries from this accident? That
5 would be Canton Injury Center, Dr. Jones, and
6 Aultman Hospital.

7 A. Can you repeat that question?

8 Q. Did we talk about all the health care providers
9 that you've received treatment from regarding
10 this accident in April of 2016?

11 A. Yes.

12 Q. And it's my understanding that you are now fully
13 healed; is that correct?

14 A. Yes.

15 Q. Is it fair to say you do not plan to seek any
16 additional treatment for these injuries?

17 A. No.

18 Q. I understand these injuries have caused
19 inconvenience to you, and you have two small
20 children. Can you walk me through what was made
21 more difficult or what you couldn't do after the
22 accident that you were able to do before the
23 accident, or were you able to kind of go on like
24 normal?

25 A. I wouldn't say go on like normal. It was hard

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1 for me to like do certain things around the
2 house, like I had to have my mom help me with
3 certain --

4 **Q. Do you recall what your mom had to help you out**
5 **with?**

6 A. Like baby-sit my kids pretty much. Help me
7 around the house.

8 **Q. Do both of your kids live with you?**

9 A. Yes.

10 **Q. So when we talked about your address at the**
11 **beginning and said you live alone, that is**
12 **inaccurate, you live with your children?**

13 A. Yes. Well, no, my children live with me.

14 **Q. So you don't live alone. You live with your two**
15 **kids?**

16 A. Yes, I live with my two kids.

17 **Q. Then I'll go quickly through your son's**
18 **treatment. So he was taken to the emergency room**
19 **by you; correct?**

20 A. Yes.

21 **Q. And he was evaluated. Do you recall if they gave**
22 **him any diagnosis or told you any recommendations**
23 **for him?**

24 A. They just gave me an ice pack for him and told me
25 if I feel like he might have a little bit of

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1 confusion or -- and if he's not okay to follow up
2 with his doctor.

3 **Q. Did you take him more for precautionary reasons**
4 **because he is a young child or was he telling**
5 **you, "Look, mom, this hurts."**

6 A. I took him because I know my child sometimes
7 he'll be confused. I took him just to see if
8 there were any injuries and to make sure he was
9 okay, but he was not okay.

10 **Q. So you took him more for precautionary reasons?**

11 A. Yes.

12 **Q. When you say he was not okay, what was wrong with**
13 **him?**

14 A. The next day he was confused. He kept saying he
15 was having aching pains and he threw up that next
16 day. So I just didn't let him go to school. I
17 just took him to Akron Children's -- well, the
18 clinic and got him checked out.

19 **Q. You took him to Akron Children's?**

20 A. Yes. It's called -- well, it used to be called
21 the Children's Clinic but I took him to Akron
22 Children's Clinic out in Canton.

23 MR. CANTU: Mike, do you have
24 those records?

25 MR. CORBEY: Un-un.

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1 Q. Okay, but you did take him to Akron Children's.
2 I saw that the recommendation in the emergency
3 room was to follow up with Akron Children's a
4 couple days after and you did take him there?

5 A. Yes.

6 Q. What did they do at Akron Children's?

7 A. They just only checked him out to see if he had
8 any injuries but he was okay but he was just a
9 little confused so I just had -- they basically
10 just recommended him to stay home one day and
11 then to follow up and tell his principal what was
12 going on. I had told her about that.

13 Q. Was it unusual that he was a little confused?

14 A. Yeah.

15 Q. Okay. And then these are questions that I have
16 to ask everyone, but have you ever been convicted
17 of a felony?

18 A. No.

19 MR. CANTU: Objection.

20 Q. Have you ever been convicted of a misdemeanor
21 crime of dishonestly or fraud?

22 MR. CANTU: Objection.

23 A. No.

24 Q. Have you ever had your license suspended or
25 revoked?

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1 MR. CANTU: Objection. You can
2 answer.

3 A. In the past.

4 **Q. What was that for?**

5 A. That was for a sticker.

6 **Q. What kind of sticker?**

7 A. Not having -- I didn't have the right type of --
8 well, because it was expired.

9 **Q. Your plates were expired?**

10 A. Yes.

11 **Q. Do you know how long ago that was?**

12 A. That was two years ago.

13 **Q. Is that the only time your license has been**
14 **suspended?**

15 A. No.

16 **Q. What was the other time?**

17 A. It was back in 2012. What happened ... yeah,
18 back in 2012, for not -- because I had an SR-22
19 bond but that, it was mines. It was just for
20 payments.

21 **Q. Payment on what? An SR-22 bond?**

22 A. Yes.

23 **Q. Any other time your license has been suspended?**

24 A. 2013.

25 **Q. What was that suspended for in 2013?**

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1 A. An SR-22 bond, making payments.

2 Q. Any other time it's been suspended?

3 A. No.

4 Q. Did you have a valid driver's license at the time
5 of this accident in April of 2016?

6 A. Yes.

7 Q. Were you wearing your seat belt?

8 A. Yes.

9 Q. You mentioned at the beginning of the deposition
10 that you had your deposition taken previously;
11 correct?

12 A. Correct.

13 Q. What was that for?

14 A. That was for a sexual harassment case.

15 Q. So nothing to do with any --

16 A. No, nothing to do with this.

17 Q. Those are all the questions I have. Is there
18 anything you would like to discuss that you think
19 is relevant to the accident or the treatment that
20 you received?

21 A. No.

22 MR. CORBEY: Those are all the
23 questions I have. Thank you for coming in
24 today. I apologize we had to meet under
25 these circumstances.

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MR. CANTU: Waive.

- - - -

(The reading and signing of the
deposition was expressly waived by the witness
and by stipulation of counsel.)

- - - -

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C E R T I F I C A T E

The State of Ohio,) SS:
County of Cuyahoga.)

I, Sandra L. Rice, a Notary Public within and for the State of Ohio, authorized to administer oaths and to take and certify depositions, do hereby certify that the above-named witness was by me, before the giving of their deposition, first duly sworn to testify the truth, the whole truth, and nothing but the truth; that the deposition as above-set forth was reduced to writing by me by means of stenotypy, and was later transcribed into typewriting under my direction; that this is a true record of the testimony given by the witness; that said deposition was taken at the aforementioned time, date and place, pursuant to notice or stipulation of counsel; and that I am not a relative or employee or attorney of any of the parties, or a relative or employee of such attorney, or financially interested in this action; that I am not, nor is the court reporting firm with which I am affiliated, under a contract as defined in Civil Rule 28(D).

IN WITNESS WHEREOF, I have hereunto set my hand and seal of office, at Cleveland, Ohio, this 13th day of June, 2017.



Sandra L. Rice, Notary Public, State of Ohio
780 Skylight Office Tower, Cleveland, Ohio 44113
My commission expires September 26, 2019

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