

Summary of Demo summary

Page:Line	Summary	Note
5:8– 7:6	<ul style="list-style-type: none"> - Verbal responses are required for clarity in the transcript. - The witness has resided at their current address for approximately two and a half to three years. - Separated and cohabiting with a partner known as Niki for nearly eight years. - The witness has three children: a 14-year-old stepson, a 6-year-old son, and a 9-month-old daughter. - All children live with the witness. - The witness has been married once and has been separated for over eight years. - Employed at a redacted location 	Personal background
7:7– 9:12	<ul style="list-style-type: none"> - Works as a chemical technician for an environmental company specializing in hazardous waste disposal and oil spill cleanup. - Responsible for containing and cleaning up oil spills on both land and water using methods such as laying down booms or padding and pressure washing affected areas. - Utilizes sausage booms to absorb oil from water, which are then retrieved using tools resembling broomsticks with hooks, often with the assistance of a winch. 	Job responsibilities
9:13– 11:1	<ul style="list-style-type: none"> - The job is considered light duty. - Padding handled at work weighs less than 12 ounces, similar to a paper towel. - The individual does not carry trash bags due to pre-disclosed limitations. - The maximum weight lifted is between 30 to 40 pounds. 	Job physicality
11:2– 13:21	<ul style="list-style-type: none"> - No experience with handling bulky or oddly shaped items. - Started employment at [redacted] in late October or early November 2003. 	Physical job requirements

	<ul style="list-style-type: none"> - Reports to [redacted] as their boss. - The individual applied for a job where the 'head man in charge', not the owner, hired them. - They had no prior relationship with the head man but knew the dispatcher, which facilitated their hiring. - During the application process, the individual informed the head man of their limitations, specifically no heavy lifting and avoiding activities that could harm their knee. - The individual does not move soil-filled drums as part of their job unless a drum cart is available to prevent strain. - Individuals typically move barrels by tilting and rolling them with one hand. 	
<u>14:1-15:15</u>	<ul style="list-style-type: none"> - Owned and operated a barber shop with a partner for nearly two years - Closed the barber shop one month after an accident due to inability to work - Partner held a master barber license but did not actively cut hair - Attended barber school for four months but left due to disagreements with the teaching method 	Previous employment
<u>15:16-17:13</u>	<ul style="list-style-type: none"> - Works at [redacted] with variable hours, typically 40-60 hours per week - Additionally cuts hair out of their garage approximately six times a week, usually for one or two customers per day - Previously worked at a barber shop and occasionally helped at a grocery store owned by their partner - Was working at the grocery store on the day of the accident - Not paid for work 	Employment history
<u>17:14-19:8</u>	<ul style="list-style-type: none"> - Sold the grocery store following an accident. - Individual's grandparent developed Alzheimer's and they became pregnant, making store management unfeasible. - Individual's other grandparent had assisted with the store but stayed home due to the grandparent's illness. - Sold the store due to increased personal 	Store ownership change

	<p>responsibilities.</p> <ul style="list-style-type: none"> - The sale was somewhat related to the inability to manage the store and the barber shop simultaneously. - The two individuals were right next to each other. - The proximity arrangement worked as long as the barber shop was empty. - Operated a Latino specialty grocery store and a barber shop under corporate names. - Partner had already named the business before the individual joined and invested money to open it. 	
<p><u>19:9–20:17</u></p>	<ul style="list-style-type: none"> - Performed the majority of haircutting services - Worked Tuesday to Wednesday from 12:00 PM to 7:00 PM, Thursday to Friday until 8:00 PM, Saturday from 9:00 AM to 8:00 PM, and Sunday from 10:00 AM to 1:00 PM - Had Mondays off - Assisted at the grocery store on Mondays and sometimes before starting work at 12:00 PM on other days 	<p>Work schedule</p>
<p><u>20:18–21:21</u></p>	<ul style="list-style-type: none"> - Returned to work at the grocery store post-accident for a limited time due to the ability to work seated - Attempted to continue working at the barber shop post-accident but stopped after approximately one to two weeks due to physical discomfort - Worked at the barber shop for nearly two years prior to the accident 	<p>Employment after accident</p>
<p><u>22:1–23:11</u></p>	<ul style="list-style-type: none"> - The witness attended school up to the 10th grade at Chelsea Vocational High School and later acquired a GED. - The witness was expelled from school in the middle of the 10th grade, approximately 13 years prior to the current age of 28, which would be in the early 1990s. - After leaving school, the witness worked at a supermarket for about a year. - Subsequently, the witness did various odd jobs and learned about being an electrician from a 	<p>Educational and employment history</p>

	<p>friend.</p> <ul style="list-style-type: none"> - The witness had other full-time employment before starting work as a barber, with details redacted. 	
<p>23:12–26:2</p>	<ul style="list-style-type: none"> - Worked in sales at a company in Glen Burnie, Maryland for over a year - Employed at Reliable for approximately four months - Held a nearly three-year position in New York before moving to Maryland - Performed front desk reception duties at West Side Federation for Senior Housing in New York for about a year - Resided in New York since birth and relocated to Maryland around six years ago - Completed GED and attended barber school in Maryland - Was not working at the barber shop while attending barber school - Attended a barber school now known by an illegible name. - The school had a different name when they were enrolled. - Confirmed working at the grocery store on the day in question. 	<p>Education and employment</p>
<p>26:3–27:20</p>	<ul style="list-style-type: none"> - Ground was wet with snow on the sides of the road from two weeks prior - Accident occurred around 7:05-7:10 PM - Individual was driving home, familiar with the route - Road had one lane each direction, divided by a visible double yellow line - Accident took place on a sloped curve on Point Pleasant between Sunny Brook and Genine 	<p>Accident conditions</p>
<p>27:21–28:12</p>	<ul style="list-style-type: none"> - Traveling towards Genine after passing Sunny Brook - Descending a slope that curves downward - Saw a truck approaching but no significant event occurred 	<p>Accident details</p>
<p>28:13–29:1</p>	<ul style="list-style-type: none"> - Traveled at 15 to 20 mph on the evening in question 	<p>Driving conditions</p>

	<ul style="list-style-type: none"> - Speed limit on the road was 25 mph - Traveled below the speed limit due to wet ground conditions for safety 	
<u>29:2– 30:8</u>	<ul style="list-style-type: none"> - Temperature was roughly mid 30s Fahrenheit on the evening in question - No ice encountered on the road or in the parking lot - Traveling at 15 to 20 miles per hour during the collision - Other vehicle's speed not estimated due to the suddenness of the event - Collision occurred quickly upon seeing the other vehicle's lights - Witness remained in their lane while the other vehicle crossed into it 	Accident details
<u>30:9– 31:9</u>	<ul style="list-style-type: none"> - There were trees to the right of the witness. - The witness observed an impact between the vehicles. - The witness did not have a clear opportunity to estimate the other vehicle's speed or see it in advance. - The witness only noticed the other vehicle's lights approaching. - The witness saw the other vehicle as it crossed into their path approximately 10-15 feet away. 	Collision details
<u>31:10– 32:15</u>	<ul style="list-style-type: none"> - Vehicles collided front driver's side to front driver's side - Witness has photographs of their vehicle's damage - Significant damage occurred to the front end of the witness's vehicle - All windows except one were blown out, including the rear and rear driver's side windows 	Accident details
<u>32:16– 35:19</u>	<ul style="list-style-type: none"> - Sustained injuries to the right knee, chest, and lower back due to impact - Experienced bruising on the chest from the seatbelt and cuts on the right knee from hitting the dashboard - Photographs of injuries were reviewed and marked as Exhibit 1 and Exhibit 2 - Exhibit 1 depicts the right knee injury without 	Injury details

	<p>showing a scar</p> <ul style="list-style-type: none"> - Exhibit 2 depicts scratches on the left knee, which did not cause continuing problems after healing - Individual had a seat belt bruise on their chest extending from the bottom of their ribs to above their left breast. - No other chest or side injuries were recalled. - Exhibit 3 depicts a bruise on the right ribcage. - The witness indicates the actual bruising was more extensive than shown in Exhibit 3. - Photos taken at home approximately two weeks after an unspecified event - Some bruising had healed by the time the photos were taken 	
<p>35:20– 36:17</p>	<ul style="list-style-type: none"> - Confirmed Exhibit No. 4 accurately depicts the vehicle's front view post-accident. - Vehicle sustained window damage and a buckled frame beneath the rear seat. - The buckled frame is visible in the photograph referred to during the deposition. 	Vehicle damage
<p>36:18– 38:4</p>	<ul style="list-style-type: none"> - Exhibit 5 is a photo of the vehicle's interior taken from the rear. - The area next to the seat behind the driver's seat is twisted. - The passenger side seat would not return to an upright position. - The rear passenger side seat was knocked down by the impact due to the buckle. - Individual confirms photographs show bruises on left arm and inside of elbow related to the accident. - Individual confirms the bruises have healed. 	Vehicle damage
<p>38:5– 38:20</p>	<ul style="list-style-type: none"> - An unidentified person offered assistance to the witness after the impact. - The witness called their girlfriend to the accident scene. - The witness instructed their girlfriend to have the tow truck take the vehicle to their house. - An ambulance and police arrived at the scene following the accident. 	Post-accident events

<p>38:21–40:20</p>	<ul style="list-style-type: none"> - The witness confirmed hitting their head during the accident. - A photograph marked as Exhibit No. 6 depicts a bruise on the upper left side of the witness's head. - The witness's head struck part of the vehicle, but they are unsure if they lost consciousness. - The first person to approach the witness post-accident was the driver of the vehicle. - The driver expressed concern and apologized to the witness, who requested an ambulance. - The witness experienced difficulty breathing and was unaware of a knee injury until the driver noticed the dashboard hanging from it. - The driver became frightened upon seeing the injury and exited the vehicle. - They removed a piece of the dashboard without assistance. - The object removed was a piece of plastic, but its specific part is unknown. 	<p>Accident details</p>
<p>40:21–42:10</p>	<ul style="list-style-type: none"> - No witnesses approached to report having seen the incident. - Residents from a nearby house and another driver arrived at the scene. - The other driver offered phone use, enabling contact with the individual's girlfriend. - Emergency services, including an ambulance and the police, arrived at the location. - The driver did not leave their name. - The driver arrived at the scene after the incident occurred. - Individual left the scene by ambulance after police were called. - Vehicles remained together after collision - Driver of the other vehicle appeared uninjured 	<p>Accident scene</p>
<p>42:11–43:20</p>	<ul style="list-style-type: none"> - Transported to University of Maryland for treatment. - Underwent X-rays and possibly a CAT scan. - Received morphine for leg pain via IV. - Knee was stitched up. - Discharged around 2:00 or 3:00 AM with ongoing pain in chest, low back, and knee. 	<p>Medical treatment post-accident</p>

	<ul style="list-style-type: none"> - Had additional bruising on other body parts. - Felt very unwell over the following days. 	
<u>43:21–45:18</u>	<ul style="list-style-type: none"> - Sought additional medical treatment after the accident - Contacted a specific doctor a few days post-accident - Had no family doctor at the time of the accident - Had seen doctors for previous knee incidents - Sustained a knee injury in a 1998 car accident in New York. - Received treatment including therapy, arthroscopic surgery, and post-surgery therapy. 	Medical follow-up
<u>45:19–47:6</u>	<ul style="list-style-type: none"> - Underwent arthroscopic surgery to clean up meniscus debris. - Felt okay after recovery but experienced occasional minor pain with excessive walking. - Uncertain about the duration of post-surgery therapy. - Surgery was performed at Saint Barnabas Hospital in the Bronx. - Location of physical therapy is forgotten but was also in the Bronx. - Cannot recall the name of the treating doctor post-accident. 	Knee surgery recovery
<u>47:7– 48:9</u>	<ul style="list-style-type: none"> - The witness confirmed an injury claim resulted from an accident. - The witness does not recall their attorney's name but possesses the attorney's business card. - The witness agreed to provide the business card to their current attorney. - Treatment for the witness's knee injury ceased while they were still in New York. - The witness experienced a slip and fall incident in Maryland affecting the same knee. 	Injury claim details
<u>48:10–49:4</u>	<ul style="list-style-type: none"> - Individual fell approximately 8-10 feet from machinery while changing a light bulb, landing on their side and impacting their knee. - The fall occurred in a warehouse, not at a jobsite. - The knee injury was a result of the fall and not 	Accident details

	due to a pre-existing condition.	
49:5– 50:7	<ul style="list-style-type: none"> - The individual received an X-ray and MRI following a slip and fall incident. - The medical assessment concluded that surgery was necessary. - The surgery performed was an open procedure. - The operation involved reconstructing the anterior cruciate ligament using a piece of the patella tendon. - The surgery is referred to as an ACL reconstruction for simplicity. - Dr. Brouillet conducted the surgery, and the individual had not treated with this doctor prior to the procedure. 	Knee surgery details
50:8– 51:4	<ul style="list-style-type: none"> - The initial surgery partially improved the condition. - A second, arthroscopic surgery was performed to further tighten the area. - Post-second surgery, the condition improved but did not fully return to the pre-accident state. - The individual was able to resume some normal activities after the second surgery. - Did not return to previous employer. - Was let go by the employer. 	Surgical outcomes
51:5– 53:19	<ul style="list-style-type: none"> - Individual does not recall the duration of time off work. - The individual had three knee surgeries: one in New York, an open surgery, and a second arthroscopic surgery. - Post-surgery, the individual was cautious with their knee, avoiding activities that might cause injury. - Approximately a year after the second surgery, which they could not recall the exact date of but was suggested to be around 2000, the individual began playing baseball with their son. - Their son was around 11 years old at the time they started playing baseball together. - Engaged in light jogging and hitting a ball, avoiding overexertion and heavy running. - Participated in swimming as an adult. 	Post-surgery activities

	<ul style="list-style-type: none"> - Owns a pool - Swam recreationally, not laps 	
<u>53:20–54:18</u>	<ul style="list-style-type: none"> - Attended barber school during knee rehabilitation - Unemployed for a period after leaving previous job - Performed various odd jobs to earn money - Performed various tasks including electrical work, painting, and plastering on an as-needed basis. - Stopped doing side jobs after entering a barber shop partnership due to lack of time. 	Employment history
<u>54:19–56:11</u>	<ul style="list-style-type: none"> - The individual has limited time and struggles to find opportunities to play with their children. - They underwent a second surgery performed by Dr. Brouillet and received physical therapy afterwards. - Post-surgery, the individual's condition improved but never returned to the state prior to their slip and fall incident at work. - They experience occasional dull pain and can walk with stability, but long walks or extended periods on their feet cause discomfort. - There are no activities that the individual is completely unable to do following the surgeries. 	Post-surgery condition
<u>56:12–57:3</u>	<ul style="list-style-type: none"> - Did not have a personal medical doctor at the time of the accident at Reliable. - Received medical care from employer's doctors at Concentral. - Visited Concentral for on-the-job medical issues and therapy post-surgery. 	Medical treatment details
<u>57:4–58:18</u>	<ul style="list-style-type: none"> - The individual underwent therapy to strengthen the surgery site and muscles around it after their surgeries. - They followed the recommended physical therapy but were hesitant to take medications unless in severe pain. - The first open knee surgery was performed by Dr. Brouillet at Kernan Hospital on November 24, 1999. - A subsequent arthroscopic surgery occurred 	Post-surgery therapy and timeline

	<p>approximately a year later due to ongoing problems.</p> <ul style="list-style-type: none"> - The individual does not recall how long they continued to see Dr. Brouillet after the second surgery. 	
<p>58:19–62:4</p>	<ul style="list-style-type: none"> - Filed a workers' compensation claim after an on-the-job accident. - Settled the claim without a hearing. - Record from Dr. Macht on June 4, 2001, indicated a 65% permanent partial disability of the right knee. - Uncertain if sent to a different doctor by the employer for evaluation. - Does not recall the agreed percentage of knee disability. - Settlement amount was for lost wages and pain and suffering, but the exact total is not remembered. - Settlement was paid over time, starting with a \$4,000 or \$5,000 check, followed by bi-weekly payments. - Stopped working as a barber shortly after a subsequent accident in February 2003 due to inability to work more than an hour or two. - Closed the barber shop, terminated the lease, and stored belongings after approximately four weeks post-accident. - Was unemployed for about eight months before starting work at an environmental company in November. - Sought treatment from Dr. Shepherd and received therapy following the February 2003 accident. - Did not return to Dr. Brouillet due to lack of insurance and their refusal to provide care without it. - Confirmed with Dr. Brouillet regarding the refusal of care. 	<p>Accident and compensation</p>
<p>62:5– 63:7</p>	<ul style="list-style-type: none"> - Underwent therapy program with Dr. Shepherd for knee injury - Received treatment for back pain with electrical stimulation and heat pads for the first two weeks - Back pain resolved within a few weeks 	<p>Therapy details</p>

	<ul style="list-style-type: none"> - Experienced persistent knee problems more than a month after the accident - Continued physical therapy for the knee until approximately a week before surgery 	
63:8– 66:4	<ul style="list-style-type: none"> - The individual underwent knee surgery in May 2003 after therapy did not significantly improve their condition. - Pre-surgery therapy was intended to strengthen the knee for a potentially quicker recovery. - Dr. Shepherd referred the individual to Dr. O'Hearn for a second opinion on the surgery. - Post-surgery recovery involved returning to the therapy center and engaging in aquatic therapy once the surgical scarring healed. - As of the current date, the individual experiences knee pain four to five times a week, depending on activity levels. - Pain is triggered by prolonged standing, walking, or driving a manual transmission vehicle. - The individual occasionally drives their girlfriend's brother's stick shift vehicle. 	Surgery recovery
66:5– 67:9	<ul style="list-style-type: none"> - Part of the job involves shoveling. - Adapted shoveling technique to avoid using injured right knee, now uses left leg instead. - Digging occurs approximately twice a month, typically for land spills, with water spills being infrequent. 	Work duties and injury
67:10– 68:3	<ul style="list-style-type: none"> - Experiences knee pain four to five times a week - Uses over-the-counter treatments Aspercreme or Flexall - Applies Flexall as needed, sometimes carrying it for use during the day 	Knee pain management
68:4– 69:7	<ul style="list-style-type: none"> - The individual's knee condition prevents them from riding a bicycle, an activity they could do before February 2003. - They used to ride a bike about once a week, typically on weekends for an hour with their stepson. 	Knee condition impact

	<ul style="list-style-type: none"> - They no longer possess the bicycle they owned back in February 2003. 	
69:8– 70:9	<ul style="list-style-type: none"> - No doctor has advised against bike riding, but the individual chooses not to ride to avoid aggravating their knee. - Started riding a bike approximately a year to a year and a half after surgery in November 2000. - Continued to ride the bike until the subsequent accident. - The bike was owned prior to the previous accidents. 	Bike riding post-surgery
70:10– 72:3	<ul style="list-style-type: none"> - Experiences awkwardness in sexual activities since the accident, with difficulties in different positions - Unable to engage in previously enjoyed activities such as biking and playing sports - Cannot throw a baseball or jog, activities previously done with children - Child plays baseball on an organized team and is currently playing football for the Rebels 	Physical limitations
72:4– 74:12	<ul style="list-style-type: none"> - Experienced pain after surgery and still feels some discomfort - Never reached a point of being completely pain-free since the surgery - Instructed to perform light duty by Dr. Shepherd or Dr. O'Hearn - Last medical record dates from September 2003 - Scheduled for a one-year checkup after surgery with Dr. O'Hearn - Needs to schedule the checkup appointment - Has not seen any other medical professionals in the seven to eight months following September 2003 	Pain and recovery status
74:13– 76:20	<ul style="list-style-type: none"> - Took Aleve for severe knee pain occasionally after stopping therapy, but this was rare. - Individual's friends and family are aware of their pain and suffering post-accident. - The individual's girlfriend, brother Rolando, and stepson are specifically knowledgeable about the impact of the accident. 	Medical consultations

	<ul style="list-style-type: none"> - Since the 2003 accident, the individual does not recall seeing any doctors other than Dr. Shepherd or Dr. O'Hearn. - The individual underwent a physical examination for their current job, conducted by either Quest Diagnostics or Concentral at a location off of Benson Avenue. - Confirmed the location as Baltimore, not Severna Park. - The individual does not recall their attorney for a previous workers' compensation claim with Reliable. - Ms. Zois has also been unable to determine the identity of the previous attorney. 	
76:21–78:6	<ul style="list-style-type: none"> - Does not recognize Dr. Robert Smith or Dr. Joel Fechter. - Does not recall seeing Dr. Thomas Centi for anything other than a knee injury sustained while with Reliable. - Plans to follow up with Dr. O'Hearn for knee treatment and has no other medical plans unless advised otherwise. - Has had knee treatment in both New York and Baltimore, with no recollection of other personal injury hospital visits. - Has not visited any hospitals in Maryland for injuries, aside from Kernan, except for non-injury related reasons. 	Medical history review
78:7– 79:7	<ul style="list-style-type: none"> - Does not recall being treated in a hospital. - Accident occurred at night during winter after 7:00 PM. - Did not take pictures of the accident scene. - Underwent physical therapy for approximately three to four months after surgery in May 2003. 	Accident conditions
79:8–79:14	<ul style="list-style-type: none"> - Followed doctor's instructions for therapy - Was not working at the time - Missed one week of therapy due to vacation 	Therapy attendance
79:15–81:6	<ul style="list-style-type: none"> - The individual traveled to Florida for vacation. - They drove to their destination. - The individual stayed in the Poinciana, Kissimmee area near Orlando. 	Vacation details

	<ul style="list-style-type: none">- They visited Universal Studios and Sea World but did not go to Disneyworld.- Performed home exercises for knee rehabilitation for approximately 1-2 months after therapy.- Did not personally handle or have knowledge of tax filings during the time as a barber; the partner managed all financial matters.	
<u>81:7-</u> <u>83:16</u>	<ul style="list-style-type: none">- The witness is not making a lost wage claim due to the accident.- The witness has been offered the right to review the deposition transcript for spelling errors but chose to waive this right.- The deposition concluded at 11:17 a.m.- Jeff M. Hook, a certified and notarized court reporter, attested to the accuracy of the transcript and the presence of counsel during stipulations.	Compensation claim