

DEPOSITION SUMMARY OF Ms. X

November 29, 2016

Venue: ******Counsel for Plaintiff: ********Counsel for Defendant: ********Court Reporter: *******

Page: Line	Summary	Subject
Direct Examination by ****		
Page 4, line 23	Q. Is English your first language?	Ms. X's personal details
Page 4, line 24	A. Yes.	
Page 5, line 6-7	Q. Have you ever had your deposition taken	
Page 5, line 8	A. No.	
Page 6, line 1-2	Q. When is the last time you took any medication?	
Page 6, line 4-10	A. I took BC powder on Saturday because I had back pain.	
Page 6, line 12-13	Q. How often do you take the BC Powder for	
Page 6, line 14	A. As needed.	
Page 6, line 18	Q. What is your date of birth?	
Page 6, line 19	A. March 2, 1975.	
Page 6, line 20	Q. Where do you currently live?	
Page 6, line 21-22	A. 9696 Cobblestone Creek Drive, Boynton Beach, Florida 33472.	
Page 6, line 25- Page 7, line 1	Q. Do you recall responding to these questions with your attorney?	
Page 7, line 2	A. No.	
Page 7, line 10-12	Q. I see that your Answers to Interrogatories are unverified, meaning you never verified them by signing the last page?	
Page 7, line 13	A. Right.	
Page 7, line 23 - Page 8, line 2	Q. The address that you have that you lived before that is 5990 Northwest 58th Terrace in Coconut Creek, Florida. Is that your correct address?	
Page 8, line 3	A. Yes.	
Page 8, line 4-5	Q. You lived there from 2001 to 2008?	
Page 8, line 6	A. Yes.	

Page: Line	Summary	Subject
Page 8, line 7	Q. Who do you currently live with?	
Page 8, line 8-11	A. I live with my boyfriend, ---- who is also the father of my kids.	
Page 8, line 14	Q. Do your kids also live with you?	
Page 8, line 15-16	A. My son is in college, but my daughter lives with me.	
Page 8, line 17	Q. What is your son's name?	
Page 8, line 18	A. Yyy , Jr.	
Page 8, line 19	Q. How old is Yyy Arnette, Jr.?	
Page 8, line 20	A. Twenty.	
Page 8, line 21	Q. Your daughter, what is her name?	
Page 8, line 22	A. **** Arnette.	
Page 8, line 25	Q. How old is ****?	
Page 9, line 1	A. Ten.	
Page 9, line 2-3	Q. Do you have any other children besides Yyy, Jr. and ****?	Ms. X's family
Page 9, line 4	A. No.	
Page 9, line 5	Q. Do you provide support for Yyy, Jr.?	
Page 9, line 6-9	A. Yes. I send him money and clothes as needed.	
Page 9, line 10	Q. Where is he in college?	
Page 9, line 11	A. Ohio State University.	
Page 9, line 12	Q. Have you ever been married?	
Page 9, line 13	A. No.	
Page 9, line 14-16	Q. Since the day of this accident, the only people that you've lived with are Yyy Arnette and your daughter?	
Page 9, line 17	A. Yes. My son was staying there at the time of the accident, also.	
Page 9, line 21-23	Q. When we were off the record I asked you for your Social Security number and you provided that to me?	
Page 9, line 24	A. Yes.	
Page 10, line 1-4	Q. With respect to your driver's license, the Florida issued license, how long have you had that license?	
Page 10, line 5	A. Since 2001 or 2002	Ms. X's Texas driving license
Page 10, line 6-7	Q. Did you have a driver's license before that?	
Page 10, line 8	A. Yes.	
Page 10, line 9	Q. ·What state was that license issued by?	
Page 10, line 10	A. Texas.	

Page: Line	Summary	Subject	
Page 10, line 11-13 Page 10, line 14	Q. With respect to your driver's license issued by the State of Florida, has that license ever been suspended? A. No.		
Page 10, line 15 Page 10, line 16	Q. Has it ever been revoked? A. No.		
Page 10, line 20-21 Page 10, line 22	Q. When were you first licensed to drive in Texas? A. I think '95. I'm not too sure.		
Page 10, line 23-24 Page 10, line 25	Q. Were you continuously licensed to drive in Texas from 1995 up until 2001? A. Yes.		
Page 11, line 1-3 Page 11, line 4	Q. With respect to your driver's license issued by the State of Texas, was that license ever suspended? A. No.		
Page 11, line 5 Page 11, line 6	Q. Was that license ever revoked? A. No.		
Page 11, line 7-8 Page 11, line 9	Q. Have you ever been licensed anywhere else besides Texas and the State of Florida? A. No.		
Page 11, line 12 Page 11, line 13	Q. Where were you born? A. In Dallas, Texas.		Locations where Ms. X had lived earlier
Page 11, line 14-15 Page 11, line 16	Q. Based on your prior testimony, did you come to Florida in or around 2001 from Texas? A. 1998.		
Page 11, line 20-21 Page 11, line 22	Q. Have you lived continuously in the State of Texas from birth until 1998? A. Yes.		
Page 11, line 23-24 Page 11, line 25	Q. When you left Texas in 1998, did you come directly to Florida? A. Yes.		
Page 12, line 1 Page 12, line 2	Q. Where in Florida did you go? A. Boca Raton.		
Page 12, line 3 Page 12, line 4	Q. How long did you remain in Boca Raton? A. Couple of years. I can't recall the exact number of years.		
Page 12, line 7 Page 12, line 8	Q. After you left Boca, where did you go? A. Coconut Creek.		
Page 12, line 9 Page 12, line 10	Q. How long did you remain in Coconut Creek? A. Three years.		

Page: Line	Summary	Subject
Page 12, line 12	Q. Where did you go after that?	
Page 12, line 13	A. Coral Springs.	
Page 12, line 14	Q. How long were you in Coral Springs?	
Page 12, line 15	A. One year.	
Page 12, line 16	Q. Where did you go after that?	
Page 12, line 17	A. Back to Coconut Creek.	
Page 12, line 18-19	Q. Then you ended up in Boynton Beach at some point?	
Page 12, line 20	A. Yes.	
Page 12, line 21	Q. What is your highest educational level?	
Page 12, line 22	A. Some college.	
Page 12, line 23	Q. Where did you go to college?	
Page 12, line 24	A. Texas Southern University.	
Page 12, line 25	Q. What was your major?	
Page 13, line 1	A. Psychology.	
Page 13, line 2-3	Q. Besides some college, have you had any other after high school training or education?	Ms. X's employment details
Page 13, line 4-11	A. Yes. I work at a preschool so, I have my CDA, my director's credential, 45 hours, and it is continuous. A CDA is something that I require to be a preschool teacher, but I don't remember what those 3 letters stand for.	
Page 13, line 12-13	Q. What age group do you teach?	Ms. X's employment details
Page 13, line 14	A. Fours and fives.	
Page 13, line 17-19	Q. With respect to the population that you teach, approximately how many children are in your group, in your room?	
Page 13, line 20-24	A. Twenty. It is a wraparound, three hours, and then, we have the extended.	
Page 13, line 25 - Page 14, line 2	Q. So your VPK program would start from 9:00 to 12:00 and then there would be aftercare after that?	
Page 14, line 3-4	A. Yes, but I'm only in there from 9:00 to 12:45.	
Page 14, line 5	Q. After 12:45, what does your day entail?	
Page 14, line 6-8	A. I do administrative work in the office.	
Page 14, line 9-10	Q. Have you always worked at Young Minds Learning Center?	
Page 14, line 11	A. Yes.	
Page 14, line 12-13	Q. When did you start working at this preschool?	Ms. X's employment details
Page 14, line 16	A. I started working in this preschool in 2012.	
Page 14, line 17-24	Q. From September 24, 2014, until today, have you always been a VPK teacher from 9:00 to 12:45, then you did administrative stuff after?	

Page: Line	Summary	Subject
Page 14, line 25	A. No.	
Page 15, line 2-4	Q. What were your job duties back in September 2014?	
Page 15, line 7	A. It was VPK only.	
Page 15, line 10-11	Q. Did you work just from 9:00 o'clock to 12:45?	
Page 15, line 12	A. 8:30 to 5:30.	
Page 15, line 13-14	Q. So, you worked from 8:30 to 5:30 for 5 days a week?	
Page 15, line 15	A. Yes.	
Page 15, line 16-17	Q. Were you teaching two different classes?	
Page 15, line 18	A. No, it was VPK, pre-K.	
Page 15, line 19-20	Q. After the three hours was up, what did you do, just regular classwork?	
Page 15, line 21-22	A. I did regular VPK at that time.	
Page 15, line 23	Q. When did you do job duties training?	
Page 15, line 24 - Page 16, line 1	A. In June, 2016.	
Page 16, line 2-3	Q. With respect to that change, was it a promotion?	
Page 16, line 4	A. Yes, promotion.	
Page 16, line 5-6	Q. Are you making a claim for lost wages in this lawsuit?	
Page 16, line 7	A. No.	
Page 16, line 19-22	Q. With respect to your lost earnings claim, was there a period of time that you could not work and did not get paid because of injuries that you're claiming from this accident?	
Page 16, line 23	A. Yes.	
Page 16, line 24	Q. And when was that?	
Page 17, line 3-5	A. I was doing like tutoring after my 8:30 to 5:30, so I took like a couple of weeks off from that.	
Page 17, line 6-8	Q. With respect to the tutoring that you were doing, is this a job that you've had for a period of time and you would continuously tutor?	
Page 17, line 9	A. Yes.	
Page 17, line 10-11	Q. Were you tutoring one child?	
Page 17, line 12	A. One child.	
Page 17, line 13-14	Q. With respect to this child that you were tutoring, how often would you tutor this child?	
Page 17, line 15	A. Two to three times a week.	
Page 17, line 16	Q. What was the child's name?	
Page 17, line 17	A. David.	

Page: Line	Summary	Subject
Page 17, line 20-22 Page 17, line 23-25	Q. You were tutoring David two to three times a week. How much were you getting paid per session? A. A hundred for each session.	
Page 18, line 1 Page 18, line 2	Q. What were you tutoring him in? A. Math.	
Page 18, line 3-4 Page 18, line 5	Q. With respect to each session, how long were these sessions? A. Two hours.	
Page 18, line 6-7 Page 18, line 8	Q. So you were tutoring David four to six hours per week? A. Yes.	
Page 18, line 9-11 Page 18, line 12	Q. Before this accident happened, approximately how long had you been tutoring David? A. Maybe three months.	
Page 18, line 13-15 Page 18, line 16-17	Q. Did you tutor David as part of an organized program or was it something that you were just doing freelancing on your own? A. I was just freelancing for a friend.	
Page 18, line 18-19 Page 18, line 20	Q. After those two to three weeks ended, did you continue to tutor David? A. No.	
Page 18, line 24 Page 18, line 25 - Page 19, line 2	Q. Why is that? A. Because I wasn't feeling good and his mother needed him to be tutored.	
Page 19, line 3-4 Page 19, line 5	Q. Did the mother find someone else to tutor him? A. Yes.	
Page 19, line 10-14 Page 19, line 15	Q. With respect to the income that you were making from this tutoring, how were you being paid? A. We were paid in cash.	
Page 19, line 16-20 Page 19, line 21-25	Q. Do you have any records at home that you can provide to your attorney so they can provide it to me to quantify how much you were getting paid by Brenda prior to you having to stop for the three weeks, with respect to your claim? A. I think she kept the record, receipts. She gave me a receipt from a receipt book.	
Page 20, line 3 Page 20, line 4	Q. Do you have those receipts at home? A. No.	
Page 20, line 5-6 Page 20, line 7-8	Q. If we wanted to find out information on Brenda, how would we find out information on her? A. I could find her number, get in contact with her.	
Page 20, line 9-15	Q. With respect to your job at Young Minds Learning Center, are you also making a claim that you lost any wages because of not being able to work because of	

Page: Line	Summary	Subject
Page 20, line 16	injuries you're claiming from this accident? Did you miss work because of this? A. No, not at Young Minds.	
Page 20, line 17-18	Q. The only work you missed was the tutoring, because of the car crash?	
Page 20, line 19	A. Yes.	
Page 20, line 23-25	Q. Before the accident that we're here about, have you ever been involved in any prior motor vehicle accidents?	
Page 21, line 1	A. No.	Ms. X's health condition prior to the accident
Page 21, line 2-4	Q. Since the accident that we're here about, have you been involved in any subsequent motor vehicle accidents?	
Page 21, line 5	A. No.	
Page 21, line 6-8	Q. Before the accident that we're discussing, about, have you been involved in any incident in which you injured your body?	
Page 21, line 9	A. No.	
Page 21, line 10-12	Q. When I say "incidents" I mean slip-and-fall, trip-and-fall, falling out of a tree, anything like that?	
Page 21, line 13	A. No.	
Page 21, line 14-16	Q. Same thing about injury caused from incidents after, have you been involved in any incidents?	
Page 21, line 17	A. No.	
Page 21, line 18-19	Q. Had you ever been treated by a chiropractor before this incident?	
Page 21, line 20	A. No.	
Page 21, line 21-23	Q. Had you ever treated with an orthopedic surgeon prior to this incident?	
Page 21, line 24	A. No.	
Page 21, line 25	Q. How about an orthopedist?	
Page 22, line 1	A. No.	
Page 22, line 2-3	Q. Had you had any physical therapy done before this accident?	
Page 22, line 4	A. No.	
Page 22, line 5-9	Q. Had you ever been treated in an emergency room, and I don't mean anything with respect to childbirth or anything like that? Have you ever been treated in an emergency room before this accident?	
Page 22, line 10	A. Yes.	
Page 22, line 11-12	Q. Why did you have to be treated in an emergency room?	
Page 22, line 13	A. Because I was having trouble breathing.	
Page 22, line 14	Q. Do you have asthma?	Ms. X had asthma and a cyst in her tail bone prior to the accident
Page 22, line 15	A. No.	
Page 22, line 16	Q. When were you having trouble breathing?	
Page 22, line 17	A. May of 2012.	

Page: Line	Summary	Subject
Page 22, line 18	Q. What emergency room did you treat in?	
Page 22, line 19	A. Delray.	
Page 22, line 20-22	Q. Besides that emergency room visit, have you had any other occasion to treat in an emergency room before this accident, any other?	
Page 23, line 5-7	A. Yes. I think in 2011.	
Page 23, line 8-9	Q. Why were you treated in an emergency room in 2011?	
Page 23, line 10	A. I had a cyst on my tail bone.	
Page 23, line 11-12	Q. What emergency room did you treat in at that time?	
Page 23, line 13	A. West Boca.	
Page 23, line 14-15	Q. Any other occasions that you treated in the emergency room before that besides those?	
Page 23, line 16	A. No.	
Page 23, line 18-19	Q. Before this accident had you ever treated in any of those Urgent Care Centers?	Ms. X's treatment at Urgent Care Centers
Page 23, line 20-21	A. Yes, for a physical, yearly physical for my job.	
Page 23, line 22-23	Q. In which Urgent Care Center did you get treated?	
Page 23, line 24-25	A. It was Boca, Glades and 441. I am not sure of the name.	
Page 24, line 4-7	Q. Besides just going there for yearly physicals, did you go there for any other occasions, if you had the flu or if you weren't feeling well?	
Page 24, line 8	A. No.	Ms. X's primary care physician
Page 24, line 9-10	Q. Did you have a primary care physician on the day of this accident?	
Page 24, line 11	A. Yes.	
Page 24, line 12	Q. Who was your primary care physician?	
Page 24, line 13	A. Dr. ****	
Page 24, line 16	Q. Where is **** located?	
Page 24, line 17	A. Margate.	
Page 24, line 18-19	Q. Is **** still your primary care physician?	
Page 24, line 20	A. Yes.	
Page 24, line 21-22	Q. How long has **** been your primary care physician?	
Page 24, line 23	A. Five years.	
Page 24, line 24-25	Q. Before ****, who did you have as your primary care physician?	
Page 25, line 1	A. I don't recall.	
Page 25, line 2-3	Q. Since you came to Florida, have you had any other primary care physician besides ****?	
Page 25, line 4-5	A. No, I don't think I have.	

Page: Line	Summary	Subject
Page 25, line 7-11	Q. Besides treating in the emergency room at **** and West Boca Medical Center, have you treated in any other hospitals in the State of Florida, whether as an inpatient outpatient, or for any other reason?	Ms. X's treatment prior to the accident
Page 25, line 13	A. Childbirth, Northwest Medical Center.	
Page 25, line 16-17	Q. When you were in Texas did you treat at any emergency rooms or any hospitals?	
Page 26, line 10-12	Presbyterian hospital in Dallas, Texas.	
Page 26, line 15	Q. Why did you go to Presbyterian Hospital?	
Page 26, line 16	A. For a Lasik surgery.	
Page 26, line 22-24	Q. Before the accident that we're here about, have you ever treated with any medical professional for neck pain?	
Page 26, line 25	A. No.	
Page 27, line 1-4	Q. Before the accident that we're here about, have you treated with any medical professional or paramedical professional for back pain or back complaints?	
Page 27, line 5	A. Yes.	
Page 27, line 6-7	Q. Who did you treat with for back pain before this accident?	
Page 27, line 8	A. Delray Medical emergency room.	
Page 27, line 11-12	Q. When did you go to **** and treat for back pain before this accident?	
Page 27, line 13	A. May of 2012.	
Page 27, line 14-16	Q. What happened why you had to treat for back pain back in May of 2012 at Delray Medical Centre?	Ms. X had asthma and back pain
Page 27, line 17	A. I was having trouble breathing.	
Page 27, line 18-19	Q. You were having trouble breathing and you treated for back pain?	
Page 27, line 20	A. Yes.	
Page 27, line 21	Q. Was there something that happened?	
Page 27, line 22 - Page 28, line 5	A. Yes. At work, sitting in a chair, and I reached down to pick up a book, and when I sat back up, I noticed a pinch in my back, didn't think anything of it. When I got home that night I was having trouble breathing. I had chest pains. So I went to the hospital.	
Page 28, line 5-7	Q. When you went to ****, you complained of back pain; did you complain of back pain or just trouble breathing?	
Page 28, line 8	A. Trouble breathing.	
Page 28, line 9-11	Q. Did you tell the emergency room staff that earlier that day you had a problem with like a pinching or a pinch in your back?	
Page 28, line 14	A. I might have. I don't remember.	
Page 28, line 15-19	Q. Do you recall whether or not they did any type of diagnostic studies within the hospital or even sent you somewhere else to determine what was causing your back pain?	CAT scan for back pain
Page 28, line 20-22	A. They did a CAT scan of my back.	
Page 28, line 23-25	Q. With respect to this CAT scan that was done, was it to your low back, mid back or upper back? A. Not sure.	

Page: Line	Summary	Subject
Page 29, line 1		
Page 29, line 2-5	Q. After the CAT scan was done, did you speak with anyone or did anyone speak with you regarding what the findings were on that CAT scan?	
Page 29, line 6	A. Yes.	
Page 29, line 7-8	Q. What, if anything, did they tell you the findings were of your CAT scan?	
Page 29, line 9	A. Maybe a bulging disc.	
Page 29, line 10-11	Q. Did they tell you at what level this bulge was?	
Page 29, line 12	A. No.	
Page 29, line 13-16	Q. Besides giving you a CAT scan, were you given any type of pain medication, anti-inflammatory, anything for the pain that you were having in your low back?	
Page 29, line 17	A. A shot.	
Page 29, line 18	Q. You were given a shot from the hospital?	
Page 29, line 19	A. Yes.	
Page 29, line 22-24	Q. With respect to the shot that you were given, did they tell you whether or not it was a cortisone shot or anything like that?	
Page 30, line 2	A. I think it was cortisone.	
Page 30, line 3-5	Q. After you were given the cortisone shot, did you get any type of relief from the pain you were having in your low back?	
Page 30, line 6-8	A. Eventually, yes. In a couple of days.	
Page 30, line 9-11	Q. Were you admitted to **** or were you released from the emergency room that day?	
Page 30, line 12	A. I was released that night.	Treatment for back pain at ****
Page 30, line 13-15	Q. When you were released from **** on that date, what, if anything, were the discharge instructions?	
Page 30, line 16	A. Pain medication.	
Page 30, line 17-18	Q. Were you given a prescription for pain medicine?	
Page 30, line 19-21	A. Yes. I think, ibuprofen.	
Page 30, line 22	Q. It was a prescription of strength?	
Page 30, line 23	A. Yes, 800.	
Page 30, line 24	Q. Were you given an anti-inflammatory?	
Page 30, line 25	A. I don't recall.	
Page 31, line 1-3	Q. With respect to the script you were given when you left the emergency room, where did you take that to be filled?	
Page 31, line 4-9	A. Publix which is located in Canyon Town Center, Boynton Beach.	
Page 31, line 10-12	Q. The Publix that you got this prescription filled, is that the only Publix that you normally go to for prescriptions?	
Page 31, line 13	A. Yes.	Pharmacies used by Ms. X
Page 31, line 14-15	Q. Before you moved to Boynton Beach, where would you go to the pharmacy?	
Page 31, line 16-20	A. Publix at Lyons and Winston park in Coconut Creek.	
Page 31, line 21 -	Q. After you got the shot, you took your pain medicine with respect to this back	

Page: Line	Summary	Subject	
Page 32, line 2 Page 32, line 3	pain. Did you get any other type of treatment or take any other medication for the back pain that you had back in 2012? A. No.		
Page 32, line 4-5 Page 32, line 6	Q. Did you have to go and see a physical therapist or chiropractor for that pain? A. No.		
Page 32, line 7-8 Page 32, line 9	Q. How soon after your emergency room visit did that pain resolve? A. Three days.		
Page 32, line 10-14 Page 32, line 15	Q. At its highest level, the most pain, if you were to rate that pain from zero, being no pain at all, to ten, being the most unimaginable pain, how would you rate it at the highest level when you had to go into the ER? A. It wasn't my back. It was my chest.		
Page 32, line 16 Page 32, line 17	Q. But you also had back pain, too, right? A. Yes, but that's not why I went.		
Page 32, line 18-19 Page 32, line 20	Q. You went to the ER because of chest pain. A. Because of my chest.		
Page 32, line 21-22 Page 32, line 23	Q. Were you also having back pain at that time? A. No.	Ms. X's ER visit in 2012	
Page 32, line 24-25 Page 33, line 1-3	Q. So why did they do a CAT scan of your back? A. Because I couldn't breathe and I told him about the incident that happened earlier with my back.		
Page 33, line 4-6 Page 33, line 7	Q. As of the time that you went to the ER because you couldn't breathe, were you having any type of back pain? A. No.		
Page 33, line 8 Page 33, line 11-13	Q. So why did they give you pain medicine? A. Because I couldn't breathe, and I put it with my back. I guess it was related.		
Page 33, line 14 Page 33, line 16-17	Q. Why did they give you a cortisone shot? A. Because the CAT scan, I guess the bulging disc.		
Page 33, line 18-19 Page 33, line 20	Q. So they just gave you a cortisone shot because you had a bulging disc? A. Yes.		
Page 33, line 23 - Page 34, line 2 Page 34, line 3	Q. After this incident when you went to the emergency room back in 2012, and before the accident, have you had any other incidents where you suffered from back pain, before this accident? A. No.		
Page 34, line 4 Page 34, line 5-13	Q. Have you ever fractured any bones? A. Yes. I broke my leg and fractured my right foot when I fell off a bicycle in 1985.		Ms. X had fractured her shin in 1985

Page: Line	Summary	Subject
Page 34, line 14-15	Q. You said you broke your leg and you said you had another fracture?	
Page 34, line 16-17	A. Fractured my foot and broke my leg, at the same time.	
Page 34, line 24-25	Q. Where in your leg did you have the break?	
Page 35, line 1	A. My shin.	
Page 35, line 5-6	Q. Where in your foot did you have a fracture?	
Page 35, line 7	A. The middle.	
Page 35, line 9-10	Q. With respect to these fractures that you had back in, you said 1985?	
Page 35, line 11	A. Yes.	
Page 35, line 12-13	Q. Did you have to go to the hospital to get those bones set or anything?	
Page 35, line 14	A. Yes.	
Page 35, line 15	Q. Which hospital did you go to?	
Page 35, line 16-20	A. Parkland Memorial which is located in Dallas, Texas.	
Page 35, line 21-23	Q. Besides getting the fractures set at Parkland Memorial, had you ever been to this hospital for any other reason?	
Page 35, line 25	A. I don't recall.	
Page 36, line 1-5	Q. Before the CAT scan that you had done at **** back in 2012, have you ever had any type of diagnostic study done on any parts of your body before the accident we're here about?	The accident on September 24, 2014
Page 36, line 7	A. No.	
Page 36, line 8-11	Q. Let us call the attention to the accident that we're here about. If the police report states that the accident occurred on September 24, 2014, does that sound correct?	
Page 36, line 12	A. Yes.	
Page 36, line 13-14	Q. Approximately what time of day did the accident occur?	
Page 36, line 15	A. At 7:30.	
Page 36, line 16-17	Q. At the time of the accident, where were you coming from?	
Page 36, line 18	A. Boston Market.	Location of the accident
Page 36, line 19-20	Q. If the accident did not occur, where were you planning to go?	
Page 36, line 21	A. Home.	
Page 36, line 22-23	Q. Home on that day was at the Cobblestone Creek Drive address?	
Page 36, line 24	A. Yes.	
Page 36, line 25	Q. Where exactly did this accident occur?	Lighting at the time of the accident
Page 37, line 1-5	A. In Boynton Beach Boulevard. I can't remember the name of the street. It's "Sunset" something....	
Page 37, line 6-9	Q. In terms of the lighting conditions at the time of the accident, can you tell me whether or not it was still light outside or it was dark? What was the lighting conditions?	
Page 37, line 10	A. It was dark.	

Page: Line	Summary	Subject
Page 37, line 11-12	Q. In terms of street lighting, was the street lighting good?	
Page 37, line 13	A. Yes.	
Page 37, line 14	Q. What kind of vehicle were you driving?	
Page 37, line 15	A. A Lexus, GS 350.	
Page 37, line 16-17	Q. Can you describe the accident for me?	
Page 37, line 18-22	A. I was heading west on Boynton Beach Boulevard. As I'm approaching the light, the green light, I see a car going to make a left turn, so I braked, but she didn't go, so as I proceeded through the light, she came out.	
Page 37, line 23-24	Q. You said you were heading west on Boynton Beach Boulevard.	
Page 37, line 25	A. Um-hum.	
Page 38, line 1-2	Q. When is the first time that you saw this other vehicle before the impact occurred?	
Page 38, line 3-4	A. Right before I went through the intersection.	
Page 38, line 5-6	Q. So you had enough time to see her and to see that she didn't apply the brake? Tell me exactly.	
Page 38, line 10-14	A. I was heading west and I saw her coming to make a left. I had the green light. So I applied the brake, and for a split second she stopped. She didn't go so I proceeded through the green light and she came out anyway.	
Page 38, line 15-17	Q. When you applied the brakes, you saw the other vehicle, you saw that she was about to make a left turn?	
Page 38, line 18	A. Um-hum.	
Page 38, line 19-21	Q. Approximately how far were you from the intersection before this happened, before you applied the brakes.	Description of the accident
Page 38, line 22	A. I don't recall.	
Page 38, line 23	Q. But you had enough time to brake?	
Page 38, line 24	A. Yes.	
Page 38, line 25 - Page 39, line 1	Q. For how long did you apply the brake before you started moving again?	
Page 39, line 2	A. I don't recall.	
Page 39, line 3-4	Q. But you said you saw her, she was about to make a left and you broke?	
Page 39, line 5	A. Um-hum.	
Page 39, line 6-7	Q. As soon as you started to go off again, that's when she turned?	
Page 39, line 8	A. Yes.	
Page 39, line 9-11	Q. You have no information regarding how long you had broken before you started going again?	
Page 39, line 12	A. No.	
Page 39, line 14-15	Q. Before you applied the brake, approximately at what speed were you traveling?	
Page 39, line 16	A. Forty-five.	
Page 39, line 17-20	Q. When you stopped your vehicle thinking that the other driver was going to turn, were you able to come to a full stop.	

Page: Line	Summary	Subject	
Page 39, line 21	A. No.		
Page 39, line 22	Q. But you were able to reduce your speed?		
Page 39, line 23	A. Yes.		
Page 39, line 24	Q. You reduced it from 45 to approximately how much?		
Page 40, line 1-4	A. To about 38, 39		
Page 40, line 6-8	Q. Were you able to stop your vehicle or were you just trying to slow down.		
Page 40, line 10	A. I was trying to slow down.		
Page 40, line 11	Q. Did you slow down?		
Page 40, line 12	A. Yes.		
Page 40, line 13-14	Q. When you slowed down, did the other vehicle also see you and try to slow down?		
Page 40, line 16	A. I don't know.		
Page 40, line 17-20	Q. Was it a fluid turn that you just saw her turning, and then the impact occurred, or did you see her turning or hesitate? What exactly did you see the other vehicle do?		
Page 40, line 22	A. She stopped.		
Page 40, line 25	Q. She was trying to turn and she stopped?		Impact of the collision
Page 41, line 1-10	A. She came out. (Indicating). You know how you come out before you go left? She came out. I applied the brakes as she was coming. She didn't complete her turn, she just came out like she wanted to turn but she didn't, so I proceeded through the light and she came out really quick.		
Page 41, line 12-13	Q. Did she stop when she saw you stopping.		
Page 41, line 14	A. I don't know if she even saw me.		
Page 41, line 12-13	Q. But she did stop when you broke and then she came out after again?		
Page 41, line 15-16	A. Yes.		
Page 41, line 19-20	Q. Did her vehicle collide with yours or did your vehicle impact hers?		
Page 41, line 21	A. I impacted her.		
Page 41, line 22-23	Q. Where on her vehicle did your vehicle impact?		
Page 41, line 24	A. The back right.		
Page 41, line 25	Q. What parts of your vehicle impacted hers?		
Page 42, line 2	A. The front right.		
Page 42, line 3-5	Q. If you were to describe this accident as a minor, moderate or very heavy impact, how would you describe it?		
Page 42, line 7	A. It was pretty hard.		
Page 42, line 8-9	Q. At the time of the impact, did your body move in any way within your vehicle?		
Page 42, line 10	A. Yes.		

Page: Line	Summary	Subject
Page 42, line 11	Q. How did your body move?	
Page 42, line 12	A. Forward. It jerked.	
Page 42, line 13	Q. Were you wearing a seat belt?	
Page 42, line 14	A. Yes.	
Page 42, line 15-16	Q. You said your body jerked forward. Did it move forward and come back after?	
Page 42, line 18	A. Yes. The seat belt locked up.	
Page 42, line 19-20	Q. Did any parts of your body impact any parts of the interior of your vehicle?	
Page 42, line 21-22	A. Just the back of my seat.	
Page 42, line 23	Q. Your head?	
Page 42, line 24	A. Yes.	
Page 42, line 25 - Page 43, line 3	Q. Did your low back also jerk or was it just your head?	
Page 43, line	A. It was like my shoulders and the middle part, my head.	
Page 43, line 4	Q. Your head went forward and back?	
Page 43, line 5	A. Um-hum.	
Page 43, line 6-7	Q. But your low back didn't impact anything?	
Page 43, line 9	A. I don't recall.	
Page 43, line 14-15	Q. Were you able to get out of your vehicle on your own?	
Page 43, line 16	A. Yes.	
Page 43, line 17-19	Q. Before you got out of your vehicle, did you feel any type of pain or discomfort to any parts of your body?	
Page 43, line 20	A. No.	
Page 43, line 21-22	Q. Did you have a cell phone with you in your vehicle?	
Page 43, line 23	A. Yes.	
Page 43, line 24-25	Q. Were you using your cell phone at the time of the accident?	
Page 44, line 1	A. Yes.	
Page 44, line 5-6	Q. You were talking to someone on the Blue Tooth?	
Page 44, line 7	A. Yes.	Ms. X was talking to her sister over the phone
Page 44, line 8-9	Q. How long had you been talking to someone on the Blue Tooth on your phone?	
Page 44, line 10-12	A. I was talking to my sister for five minutes.	
Page 44, line 13	Q. What was your phone number?	
Page 44, line 14	A. (954) 825-6707	
Page 44, line 15	Q. Who was your cell phone carrier?	

Page: Line	Summary	Subject
Page 44, line 16	A. Sprint.	
Page 44, line 17	Q. ·What is your sister's number?	
Page 44, line 24-25	A. (Witness looks at phone). (214) 622-2515.	
Page 45, line 1-3	Q. Besides talking on the phone at the time of the accident, were you distracted in any other way?	
Page 45, line 4	A. No.	
Page 45, line 7-8	Q. Did you speak with someone or what happened after you got out of your vehicle?	
Page 45, line 9 - Page 46, line 2	A. Before I got out I was kind of shaken, so my sister was screaming, "Are you okay?" "What happened". I said "I just hit somebody. Let me call Yyy.". So I hung up with her. I got out of the car and I walked to the front of my car. As I'm walking to the front of my car, I took my phone out to call Yyy to let him know what had just happened and got my car out of the streets after the collision. Then, I called 911, told that we needed assistance and asked them if I could move my car out of the streets and get it to the side of the road. Then, I moved it behind the defendant's car and went over to her to make sure that she was alright.	
Page 46, line 3	Q. Was she okay?	
Page 46, line 4	A. Yes.	
Page 46, line 5	Q. Did the police come to the scene?	Events that ensued after the accident had occurred
Page 46, line 6	A. Yes.	
Page 46, line 7-8	Q. When the police came to the scene, were you able to have any conversation with them?	
Page 46, line 9	A. Yes.	
Page 46, line 10-11	Q. What was the sum and substance of your conversation with them?	
Page 46, line 12	A. I don't even remember.	
Page 46, line 13-14	Q. ·Did you have a conversation with the driver of the other vehicle?	
Page 46, line 15	A. Yes.	
Page 46, line 16-17	Q. ·What was the sum and substance of the conversation that you had with her?	
Page 46, line 18-19	A. She apologized. She said that she didn't see me.	
Page 46, line 20	Q. Did an ambulance come to the scene?	
Page 46, line 21	A. No.	
Page 46, line 22-23	Q. Did the police ask you whether or not you needed an ambulance?	
Page 46, line 24	A. No.	
Page 46, line 25 - Page 47, line 1	Q. Were you able to walk around at the scene?	The police arrived at the accident scene
Page 47, line 2	A. Yes.	
Page 47, line 6-7	Q. Were you able to drive your vehicle away from the scene?	
Page 47, line 8	A. Yes.	

Page: Line	Summary	Subject
Page 47, line 9	Q. Did Yyy come to the scene?	
Page 47, line 10	A. Yes.	
Page 47, line 11-12	Q. How far after the impact did he come to the scene?	
Page 47, line 13	A. I'm not sure.	
Page 47, line 14-15	Q. Was he there when the police officer was there?	
Page 47, line 16	A. Yes.	
Page 47, line 17-18	Q. When was the first time you felt any type of pain or discomfort from this accident?	Ms. X's pain and discomfort after the accident
Page 47, line 19	The next day.	
Page 47, line 20-21	Q. What kind of pain or discomfort did you feel the next day?	
Page 47, line 22	A. Just sore.	
Page 47, line 23	Q. Where were you sore?	
Page 47, line 24	A. All over.	
Page 47, line 25 - Page 48, line 1	Q. Did that soreness change after a period of time?	
Page 48, line 2	A. Yes.	
Page 48, line 3	Q. How did it change?	
Page 48, line 4-8	A. My low back started hurting more.	
Page 48, line 9-14	Q. With respect to the area of your low back that you were feeling either pain or discomfort after the accident, is it the same or similar area where you felt discomfort back in 2012 before you had that episode that you had to go to *****? A. No.	
Page 48, line 15		
Page 48, line 16	Q. What is the difference to the areas?	
Page 48, line 17-18	A. The sides that it was on. This pain was on the left side.	
Page 48, line 19-22	Q. The pain in the left side of your low back was the "new pain" you had after the accident?	
Page 48, line 25	A. Yes.	
Page 49, line 1-2	Q. With respect to the pain before, what side was that on?	
Page 49, line 3	A. I think it was the right side.	
Page 49, line 6-9	Q. Besides this left-sided low back pain, were you feeling any other type of pain or discomfort just after the accident?	
Page 49, line 10	A. In the middle of my back.	
Page 49, line 11	Q. When did the mid back pain start?	
Page 49, line 12	A. A couple of weeks later.	
Page 49, line 13	Q. Any other pain?	

Page: Line	Summary	Subject
Page 49, line 14	A. No, just headaches.	
Page 49, line 15	Q. When did the headaches start?	
Page 49, line 16	A. The next day.	
Page 49, line 17-20	Q. When you started to feel pain and discomfort the day after the accident, what, if anything, did you do for your pain and discomfort?	
Page 49, line 21-23	A. Just over-the-counter Advil.	
Page 49, line 24-25	Q. Did you get any type of relief from this over-the-counter Advil?	
Page 50, line 1	A. Temporary.	
Page 50, line 2-3	Q. If you took some more, would you get some relief?	
Page 50, line 4	A. Yes.	
Page 50, line 5-7	Q. When was the first time you sought any type of medical treatment for the injuries you're claiming from this accident?	
Page 50, line 8-9	A. I think it was the next week. I'm not sure of the exact date.	
Page 50, line 10	Q. Where did you go for medical treatment?	
Page 50, line 11-12	A. A chiropractor whose name I don't remember.	
Page 50, line 15-17	Q. In your Answers to Interrogatories, you have Boynton Beach Medical Center; could that be where the chiropractor was?	
Page 50, line 18	A. Yes.	
Page 50, line 19-20	Q. How did you come to find out about this chiropractor?	
Page 50, line 21	A. I don't recall.	
Page 50, line 22-23	Q. Did you ever go to this chiropractor before this accident?	
Page 50, line 24	A. No.	
Page 50, line 25 - Page 51, line 1	Q. When you went to the chiropractor, what were your complaints?	
Page 51, line 2	A. Back pain.	Chiropractic treatment for her back pain
Page 51, line 3-5	Q. The back pain that you were complaining of, what area of your back was that, low, middle or somewhere else?	
Page 51, line 6	A. Just all of it, just aching.	
Page 51, line 7-8	Q. Did the chiropractor do an x-ray of your back?	
Page 51, line 9	A. Yes.	
Page 51, line 10-11	Q. After that x-ray was done, did he tell you what the findings were?	
Page 51, line 12	A. I don't recall.	
Page 51, line 13-15	Q. Did you tell that chiropractor that prior to this accident you had an incident where you had a CAT scan done of your low back?	
Page 51, line 16	A. I don't recall.	
Page 51, line 17-18	Q. What kind of treatment did the chiropractor provide for you?	
Page 51, line 19-20	A. Massage table, massages. I saw another doctor that wanted to do like injections.	
Page 51, line 25 -	Q. Approximately how long did you treat with this chiropractor?	

Page: Line	Summary	Subject
Page 52, line 1		
Page 52, line 2	A. I don't recall.	
Page 52, line 3-4	Q. Did you treat with this chiropractor in 2016.	
Page 52, line 5	A. No.	
Page 52, line 6-7	Q. Did you treat with this chiropractor in 2015?	
Page 52, line 8	A. I don't remember.	
Page 52, line 9-10	Q. Do you have any appointments to treat with this chiropractor now?	
Page 52, line 11	A. No.	
Page 52, line 12-14	Q. When you last treated with this chiropractor, did you feel like you were getting any relief from the pain you were complaining of?	
Page 52, line 15	A. Temporary.	
Page 52, line 16-19	Q. Besides this chiropractor at Boynton Beach Medical Center, have you been treated by any other chiropractors for injuries sustained this accident?	
Page 52, line 20	A. Yes.	
Page 52, line 21	Q. Who is the other chiropractor?	
Page 52, line 22	A. Donny Icsman.	
Page 52, line 25	Q. Where is Donny Icsman located at?	
Page 53, line 1	A. Boca.	
Page 52, line 2-4	Q. What is the name of his facility? Athletes Edge Performance?	
Page 53, line 5	A. Yes.	
Page 52, line 6	Q. Who referred you to this facility?	
Page 53, line 7-9	A. Yyy, my boyfriend.	
Page 53, line 10-11	Q. When was the last time you treated there?	
Page 53, line 12-14	A. September 2016.	
Page 53, line 15-16	Q. Do you have any future appointment to treat there?	
Page 53, line 17	A. I go as needed.	
Page 53, line 18-19	Q. What are you treating with Donny Icsman for?	
Page 53, line 20	A. My back.	
Page 53, line 23-24	Q. Who referred you to Total M.D.? I see that listed here.	
Page 53, line 25	A. I'm not sure, I don't remember.	
Page 54, line 1	Q. Do you remember treating there?	Treatment at
Page 54, line 2	A. Yes.	Total M.D.
Page 54, line 3-4	Q. When was the last time you treated at Total M.D.?	

Page: Line	Summary	Subject
Page 54, line 5	A. I don't remember.	
Page 54, line 6	Q. Did you treat there in 2016?	
Page 54, line 7	A. I don't remember.	
Page 54, line 8-9	Q. Do you have any future appointments to treat there?	
Page 54, line 10	A. No.	
Page 54, line 11-12	Q. When you went to Total M.D., what were your complaints?	
Page 54, line 13	A. Low back.	
Page 54, line 16	Q. Who did you treat with there?	
Page 54, line 17	A. Dr. Bach.	
Page 54, line 18-19	Q. When you saw Dr. Bach, what were his recommendations for you?	
Page 54, line 20	A. Weekly injections.	
Page 54, line 21	Q. What kind of injections?	
Page 54, line 22	A. I don't recall the name of them.	
Page 54, line 23-24	Q. Did you have any of these weekly injections?	
Page 54, line 25	A. No.	
Page 55, line 1	Q. Why didn't you have the injections done?	
Page 55, line 2	A. Hesitant to get a needle in my back.	
Page 55, line 3-4	Q. Did Dr. Bach recommend any surgery for you?	
Page 55, line 5-6	A. He said that it would probably be needed in the future.	
Page 55, line 7-8	Q. What kind of surgery did he say you need in the future?	
Page 55, line 9	A. I don't recall.	
Page 55, line 10-11	Q. Do you have any plans to go back to treat at Total M.D.?	
Page 55, line 12	A. If I need to.	
Page 55, line 13-14	Q. What would cause that need?	
Page 55, line 16	A. If the back pain doesn't get better.	
Page 55, line 17-18	Q. Did you feel like your back pain has gotten any better, or plateaued, or what?	
Page 55, line 19	A. It is lingering.	
Page 55, line 20-21	Q. What does that mean?	
Page 55, line 22-25	A. It is there. I take over-the-counter medication for temporary relief. I go to the physical therapy for temporary relief. It is not going away.	
Page 56, line 1-5	Q. You said you go to therapy for temporary relief and you take over-the-counter medicines. If you rated from zero, being no pain, to ten, being the most unimaginable pain ever, how would you rate your pain.	
	A. Seven.	Temporary pain relief

Page: Line	Summary	Subject
Page 56, line 7		
Page 56, line 8-9	Q. Is this back pain a constant seven out of ten or does it get better sometimes?	Aggravation of pain due to exercises
Page 56, line 10	A. It gets better at times.	
Page 56, line 11-12	Q. Is there something that you do normally that will aggravate the pain?	
Page 56, line 13-18	A. When I go to football games or soccer games, I can't sit on the bleachers for too long. I would have to stand and lean against something because when I slouch it aggravates my pain.	
Page 56, line 19-21	Q. Once you move from that aggravating position, does the pain resolve itself or do you have to take something for it?	
Page 56, line 22	A. Yes, I have to take medication.	
Page 56, line 23	Q. Do you go to the gym?	
Page 56, line 24	A. No.	
Page 56, line 25 - Page 57, line 1	Q. Before the accident, did you go to a gym?	
Page 57, line 2	A. Yes.	
Page 57, line 3	Q. What gym did you go to?	Ms. X was unable to exercise at the gym due to her back pain
Page 57, line 4	A. My community.	
Page 57, line 5	Q. What community do you live at?	
Page 57, line 6	A. Cobblestone.	
Page 57, line 7-8	Q. Is there any reason why you no longer go to the gym?	
Page 57, line 9	A. My back issues.	
Page 57, line 10-11	Q. So but for the back issues, would you still go to the gym?	
Page 57, line 12	A. Yes.	
Page 57, line 13	Q. What do you do for exercise now?	
Page 57, line 14	A. I don't.	
Page 57, line 15-17	Q. What injuries are you claiming to have sustained from this accident?	Injuries which Ms. X suffered as a result of the accident
Page 57, line 18	A. Back.	
Page 57, line 21	Q. I your low back?	
Page 57, line 22	A. All of it, overall.	
Page 57, line 23 - Page 58, line 2	Q. In your Answers to Interrogatories number 11, you mention that you're claiming bodily injuries to your back and neck. Are you making a claim that your neck was injured in this accident?	
Page 58, line 5	A. No.	
Page 58, line 6	Q. So, just the back?	
Page 58, line 7	A. Yes.	

Page: Line	Summary	Subject	
Page 58, line 8-11 Page 58, line 13	Q. Are you making a claim that you're making psychological injuries from this accident? A. Yes.		
Page 58, line 14-16 Page 58, line 17	Q. Have you treated with a psychologist or any mental health professional for injuries that you're claiming from this accident? A. No.		
Page 58, line 18 Page 58, line 19	Q. What are your psychological complaints? A. I don't know.		
Page 59, line 2-3 Page 59, line 4	Q. Have you ever treated with a psychologist before this accident? A. No.		
Page 59, line 5-7 Page 59, line 8	Q. Have you ever been diagnosed as having any kind of psychological issues that you're relating to this accident? A. No.		
Page 59, line 9-10 Page 59, line 12	Q. Are you still making a claim that you suffered psychological injuries in this accident? A. Yes.		
Page 59, line 25 – Page 60, line 2 Page 59, line 3-8	Q. Are you claiming that you are disabled because of injuries that you suffered in this accident? A. I'm limited in things that I can do. I used to play with my daughter. I can't do that anymore. I can't exercise any more. I can't stand for too long anymore.		
Page 60, line 9-11 Page 60, line 12	Q. What type of sports were you playing with your daughter? A. She plays soccer. I used to practice with her.		Ms. X used to play wither daughter prior to the accident
Page 60, line 15-17 Page 60, line 18	Q. With respect to exercising, I think you testified before that you would go to your community gym. A. Yes.		
Page 60, line 21-25 Page 61, line 1	Q. Besides treating with Total M.D., Boynton Beach Medical Center and Athletes Edge Performance, have you treated with any other medical providers or any other facility for the injuries you're claiming from this accident? A. No.		MRI scan at Total M.D.
Page 61, line 2-3 Page 61, line 4	Q. Have you had an MRI done since this accident? A. Yes.		
Page 61, line 5 Page 61, line 6	Q. Where was the MRI done? A. At Total M.D.		
Page 61, line 7-20	Q. In your Answers to Interrogatories, number 13, the question was asked, "do you consent that you've lost any income, benefits or earning capacity in the past or the future as a result of the incident described in the complaint? In your response, you have, "Yes". I've missed multiple days of work due to medical treatment and pain and suffering. Is it your claim that you've lost earnings from Young Minds Learning Center because of the injuries you suffered in this accident?	Loss of wages after the accident	

Page: Line	Summary	Subject
Page 61, line 21-25	A. Yes. Sometimes when I get back pains, I would have to call in to work.	
Page 62, line 1-4	Q. When you call in to work at Young Minds Learning Center, did you miss work because of that?	
Page 62, line 5	A. Yes.	
Page 62, line 6-7	Q. Approximately how many days did you have to call in?	
Page 62, line 8	A. I don't recall. It is off and on.	
Page 62, line 10-12	Q. Do you have any future appointments to see any doctors or any medical professionals for the injuries you're claiming from this accident?	
Page 62, line 13	A. I go as needed.	
Page 62, line 17-18	Q. Have you had any vacations since this accident?	Ms. X's vacation
Page 62, line 19-21	A. Yes. I have been to Ohio, Texas.	
Page 62, line 22-23	Q. Have you ever filed a claim for Disability?	
Page 62, line 24	A. No.	
Page 62, line 25 - Page 63, line 1	Q. Have you ever filed a claim for Workers' Compensation?	
Page 63, line 2	A. No.	
Page 63, line 3	Q. Do you have health insurance?	
Page 63, line 4	A. Yes.	
Page 63, line 5	Q. Who is your health insurance provider?	Ms. X's health insurance
Page 63, line 6	A. United Healthcare.	
Page 63, line 7-8	Q. Has United Healthcare been your health care provider since this accident?	
Page 63, line 9	A. No.	
Page 63, line 10	Q. Who did you have before that?	
Page 63, line 11	A. Av-Med.	
Page 63, line 12-13	Q. Do you get any type of Medicaid or anything like that?	
Page 63, line 14	A. No.	
Page 63, line 15-18	Q. At the time of the accident, you testified that you were coming from Boston Market. Did you have dinner at Boston Market or were you just doing pickup?	
Page 63, line 19	A. Pickup	
Page 63, line 20-21	Q. Did you have anything alcoholic to drink within 12 hours of this accident?	Ms. X was not drunk at the time of the accident
Page 63, line 22	A. No.	
Page 63, line 23-24	Q. Did you use any type of medication or drugs within 12 hours of this accident?	
Page 63, line 25	A. No.	
Page 64, line 1	Q. Have you ever been convicted of a crime?	Ms. X was arrested for theft

Page: Line	Summary	Subject
Page 64, line 2	A. No.	in 1993
Page 64, line 3	Q. Have you ever been arrested?	
Page 64, line 4	A. Yes.	
Page 64, line 5	Q. What was your arrest for?	
Page 64, line 6	A. Theft.	
Page 64, line 7	Q. When were you arrested for theft?	
Page 64, line 8	A. 1993.	
Page 64, line 9	Q. Where were you arrested for theft?	
Page 64, line 10	A. Houston, Texas.	
Page 64, line 11	Q. What was the disposition of that arrest?	
Page 64, line 12	A. Probation.	
Page 64, line 13	Q. How long were you on probation?	
Page 64, line 14	A. Six months.	
Page 64, line 15	Q. What was it theft of?	
Page 64, line 16	A. Clothing.	
Page 64, line 17	Q. Was it at a department store?	
Page 64, line 18	A. Yes.	
Page 64, line 19	Q. What department store was that?	
Page 64, line 20	A. What department store was that?	
Page 64, line 21	Q. Any other arrests besides that?	
Page 64, line 22	A. No, tickets, yes.	
Page 64, line 23	Q. You were arrested for tickets?	
Page 64, line 24	A. Yes.	
Page 64, line 25	Q. What kind of tickets?	
Page 65, line 1-3	A. I don't know; it was like a parking ticket. Somebody got tickets in my name and I was arrested for it.	
Page 65, line 4-5	Q. People get arrested for parking tickets?	
Page 65, line 6-11	A. I don't recall what kind of ticket it was. I was driving and I was pulled over and they said I had tickets in my name and I didn't ask them what kind. I said "It wasn't me", but my name and birthday were mentioned on the ticket and so, they arrested me.	
Page 65, line 12	Q. What city was this in?	
Page 65, line 13	A. Dallas.	
Page 65, line 14	Q. When was this?	

Page: Line	Summary	Subject
Page 65, line 15	A. 1994.	
Page 65, line 16-17	Q. Do you have any arrests in the State of Florida?	
Page 65, line 18	A. No.	
Page 65, line 19-20	Q. Besides those two arrests, any other arrests?	
Page 65, line 21	A. No.	
Page 65, line 22	Q. Any DUIs?	
Page 65, line 23	A. No.	Ms. X was not party to any other lawsuits
Page 65, line 24-25	Q. Besides this lawsuit, have you ever been a party to any other lawsuits?	
Page 66, line 1	A. No.	
CROSS EXAMINATION BY ****		
Page 66, line 6-7	Q. Has being in this car accident changed the way that you do things in life?	
Page 66, line 8	A. Yes.	Ms. X's limitations as a result of the accident
Page 66, line 9-10	Q. What types of things has this car accident and the injuries from it changed?	
Page 66, line 11-17	A. My active life. I can't do physical activities with my child. I can't do physical activities for my health. It takes a toll on me standing for long periods of time. Most of the time Yyy has to make dinner because I'm in pain.	
Page 66, line 18-19	Q. So, you have a very sports-oriented family?	
Page 66, line 20	A. Yes.	
Page 66, line 21	Q. So your daughter plays sports?	
Page 66, line 22	A. Yes.	
Page 66, line 23	Q. What sports does she play?	
Page 66, line 24	A. She plays soccer and softball.	
Page 66, line 25	Q. Your son plays sports, correct?	
Page 67, line 1	A. Yes.	Ms. X could not play with her children after the accident
Page 67, line 2	Q. What sports does he play?	
Page 67, line 3	A. Football.	
Page 67, line 4-5	Q. And currently where does he play football?	
Page 67, line 6	A. Ohio State.	
Page 67, line 7-8	Q. He is a corner-back for Ohio State, correct/	
Page 67, line 9	A. Yes.	
Page 67, line 10-11	Q. Your husband is a former professional basketball player, correct?	
Page 67, line 12	A. Yes.	
Page 67, line 13	Q. Did you play sports growing up?	
	A. Yes.	

Page: Line	Summary	Subject
Page 67, line 14		
Page 67, line 15	Q. What sports did you play growing up?	
Page 67, line 16	A. Basketball, volleyball, tennis, soccer.	
Page 67, line 17-19	Q. Have you been able to enjoy things like volleyball, basketball, tennis, soccer, since this crash?	
Page 67, line 20	A. No.	
Page 67, line 21-22	Q. Have you been able to go to the gym since this crash?	
Page 67, line 23	A. No.	
Page 67, line 24-25	Q. Is working out and staying fit something that's important to you?	
Page 68, line 1	A. Yes.	
Page 68, line 2-3	Q. Why is that something that's important to you?	
Page 68, line 4-6	A. Because it is a lifestyle that we always. I mean, that my family has always enjoyed. It is healthy.	
Page 68, line 7-8	Q. You told us about a vacation, one of them was to Ohio, correct?	
Page 68, line 9	A. Um-hum.	
Page 68, line 10-11	Q. What was the last trip that you took to Ohio?	
Page 68, line 12	A. This past weekend.	
Page 68, line 13	Q. Why did you go there?	
Page 68, line 14	A. Because my son had a football game.	
Page 68, line 15-16	Q. That was Ohio State playing Michigan, correct?	
Page 68, line 17	A. Yes.	
Page 68, line 18-19	Q. And it was number two in the country versus number three in the country?	
Page 68, line 20	A. Yes.	
Page 68, 21-22	Q. Is there anything that would have stopped you from going to that football game?	
Page 68, line 23	A. Only if I was in the hospital.	
Page 68, 24-25	Q. ·So the only time you wouldn't go to that football game was if someone was physically preventing you from going?	
Page 69, line 1	A. Yes.	
Page 69, line 3-4	Q. You're going to continue to take care of your kids, correct?	
Page 69, line 5	A. Of course.	
Page 69, line 6-7	Q. And support them in their sports, correct?	
Page 69, line 8	A. Yes.	
Page 69, line 9-11	Q. How does it make you feel that you can't, for instance, practice with your daughter playing soccer?	
Page 69, line 12	A. It is frustrating.	

Page: Line	Summary	Subject
Page 69, line 13-14	Q. When you say, "It is frustrating," just describe what you're thinking.	Ms. X was frustrated because she was unable to do the things that she enjoyed doing with her children before the accident
Page 69, line 15-18	A. I just wish I was able to do with her, do physical things with her, as I was able to do with my son growing up. It kind of limits the things that I do with her.	
Page 69, line 19-20	Q. Does that make you feel like you're not as good of a mom to **** as you were to Yyy?	
Page 70, line 1	A. It is in the back of my mind what she's thinking. She says, "Mom, come on, I see pictures, is this what you did with Yyy?" I say "You have to understand I can't do as many things with you as I did with him because of my back.	
Page 70, line 2-4	Q. Is there anything else that limits your ability to enjoy your time with your daughter, or your son, or your husband other than your back?	
Page 70, line 5	A. No.	
Page 70, line 6-8	Q. Is there anything else that limits your ability to work out or play sports other than your back?	
Page 70, line 9	A. No.	
Page 70, line 10-11	Q. When you are physically in pain, how does that affect your psyche?	
Page 70, line 12-17	A. It is frustrating. I get upset with Yyy and **** for the for the simplest things. I kind of have to go into a room by myself and think, "Why is this happening to me?". I kind of wish that I could just take the pain away.	
Page 70, line 18-20	Q. And you told us one example of problems with the family is Yyy has to cook a lot, where you used to do the cooking I take it?	Ms. X was unable to cook because of her back pain
Page 70, line 21	A. Right.	
Page 70, line 22-23	Q. When you just went up to Ohio State, did you have Thanksgiving dinner up there?	
Page 70, line 24	A. Yes.	
Page 70, line 25	Q. Did you cook Thanksgiving dinner?	
Page 71, line 1-3	A. As much as I could, as much as I was able to stand, but my sister-in-law was there, so she did a lot.	
Page 71, line 4-5	Q. You needed your sister-in-law to help you?	
Page 71, line 6	A. Yes.	
Page 71, line 7-8	Q. Was the only limitation in your cooking all of Thanksgiving dinner your back?	
Page 71, line 9	A. Yes.	
RE-DIRECT EXAMINATION BY *****		
Page 71, line 14-17	Q. You testified earlier that you were very active and played sports, tennis, basketball and other things. Were you ever injured playing sports?	Ms. X never got injured while playing sports
Page 71, line 18	A. No.	