

**VERBATIM DEPOSITION SUMMARY OF XXXXX**

**DEPOSITION DATE: NOVEMBER 00, 0000**

**Plaintiff Name  
Vs.  
Defendant**

<b>Page: Line</b>	<b>Summary</b>	<b>Subject</b>	
<b>Direct Examination by Attorney</b>			
Page 4, line 23 Page 4, line 24	Q. Is English your first language? A. Yes.	Ms. X's personal details	
Page 5, line 6-7 Page 5, line 8	Q. Have you ever had your deposition taken A. No.		
Page 6, line 1-2 Page 6, line 4-10	Q. When is the last time you took any medication? A. I took BC powder on Saturday because I had back pain.		
Page 6, line 12-13 Page 6, line 14	Q. How often do you take the BC Powder for A. As needed.		
Page 6, line 18 Page 6, line 19	Q. What is your date of birth? A. XXX X, 1975.		
Page 6, line 20 Page 6, line 21-22	Q. Where do you currently live? A. ##### XXXXX Drive, XXXX, XX XXXXX.		
Page 6, line 25- Page 7, line 1 Page 7, line 2	Q. Do you recall responding to these questions with your attorney? A. No.		
Page 7, line 10-12 Page 7, line 13	Q. I see that your Answers to Interrogatories are unverified, meaning you never verified them by signing the last page? A. Right.		
Page 7, line 23 - Page 8, line 2 Page 8, line 3	Q. The address that you have that you lived before that is XXXY XXX YY Terrace in XX, XX. Is that your correct address? A. Yes.		
Page 8, line 4-5 Page 8, line 6	Q. You lived there from 2001 to 2008? A. Yes.		
Page 8, line 7 Page 8, line 8-11	Q. Who do you currently live with? A. I live with my boyfriend, ---- who is also the father of my kids.		
Page 8, line 14 Page 8, line 15-16	Q. Do your kids also live with you? A. My son is in college, but my daughter lives with me.		Ms. X's family
Page 8, line 17 Page 8, line 18	Q. What is your son's name? A. XXX, Jr.		
Page 8, line 19 Page 8, line 20	Q. How old is XXX, Jr.? A. Twenty.		
Page 8, line 21 Page 8, line 22	Q. Your daughter, what is her name?  A. **** XXXXX.		
Page 8, line 25 Page 9, line 1	Q. How old is ****?		

Page: Line	Summary	Subject
	A. Ten.	
Page 9, line 2-3 Page 9, line 4	Q. Do you have any other children besides XXX, Jr. and *****?  A. No.	
Page 9, line 5 Page 9, line 6-9	Q. Do you provide support for XXX, Jr.?  A. Yes. I send him money and clothes as needed.	
Page 9, line 10 Page 9, line 11	Q. Where is he in college?  A. XXX.	
Page 9, line 12 Page 9, line 13	Q. Have you ever been married?  A. No.	
Page 9, line 14-16 Page 9, line 17	Q. Since the day of this accident, the only people that you've lived with are XXX and your daughter?  A. Yes. My son was staying there at the time of the accident, also.	
Page 9, line 21-23 Page 9, line 24	Q. When we were off the record I asked you for your Social Security number and you provided that to me?  A. Yes.	
Page 10, line 1-4 Page 10, line 5	Q. With respect to your driver's license, the XXX issued license, how long have you had that license?  A. Since 2001 or 2002	
Page 10, line 6-7 Page 10, line 8	Q. Did you have a driver's license before that?  A. Yes.	
Page 10, line 9 Page 10, line 10	Q. What state was that license issued by?  A. XX.	
Page 10, line 11-13 Page 10, line 14	Q. With respect to your driver's license issued by the State of XXX, has that license ever been suspended?  A. No.	Ms. X's XX driving license
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 XX?  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 XX 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 XX, was that license ever suspended?  A. No.	

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