

1 A: No, I did not.

2 Q: Did you -- when you saw the truck coming

1 Q: Okay.

2 A: And I -- like I said I had merged over into  
3 that first -- the right turn left turn lane, and I was  
4 riding along side of him at that time.

5 Q: Okay.

6 And my question to you is, okay, where  
7 alongside the tractor and the tanker trailer were you  
8 when he commenced to come into your lane as you suggest?

9 Where -- what part of the tractor and trailer  
10 were you in conjunction with when that occurred?

1

Pardon me, if you go to Page 66, Line 22 which

begin when you're

1 November, 2007?

2 A: I do remember that Deposition.

3 Q: Okay.

4 Do you agree that your Deposition testimony is  
5 -- is accurate?

6 A: Yes.

7 Q: Okay.

8 Did you ever progress further than the rear  
9 tandems of the trailer? Did you ever progress forward,  
10 further than that point, after he commenced to come into  
11 your lane?

12 A: I can't recall.

1 A: That is correct.

2 Q: And do you agree that in conjunction with

1

Q: Line 19, I asked you, "Before making the

did you look in your mirror or side view mirror.



1                   What speed are you going throughout that period  
2 of time?

3                   A: The speed limit.



1 traveling down Mattawoman Beantown Road and you're in the  
2 two through lanes and the turn lanes are coming up, if  
3 you want to get into one of those turn lanes you  
4 essentially just go straight into it. Do you agree with

29

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

1 entered into your lane?

1 until the point that you made the abrupt lane change to  
2 the left?

3 A: Yes.

4 Q: Okay.

5 But whether or not you accelerated or  
6 decelerated or braked or whatever, you have no knowledge  
7 in terms of the lane change?

8 A: I just can't remember.

9 Q: Okay.

10 But you do remember you didn't indicate?

11 A: Correct.

12 Q: And you do remember you didn't sound your  
13 horn when you saw a tanker trailer coming into your lane?

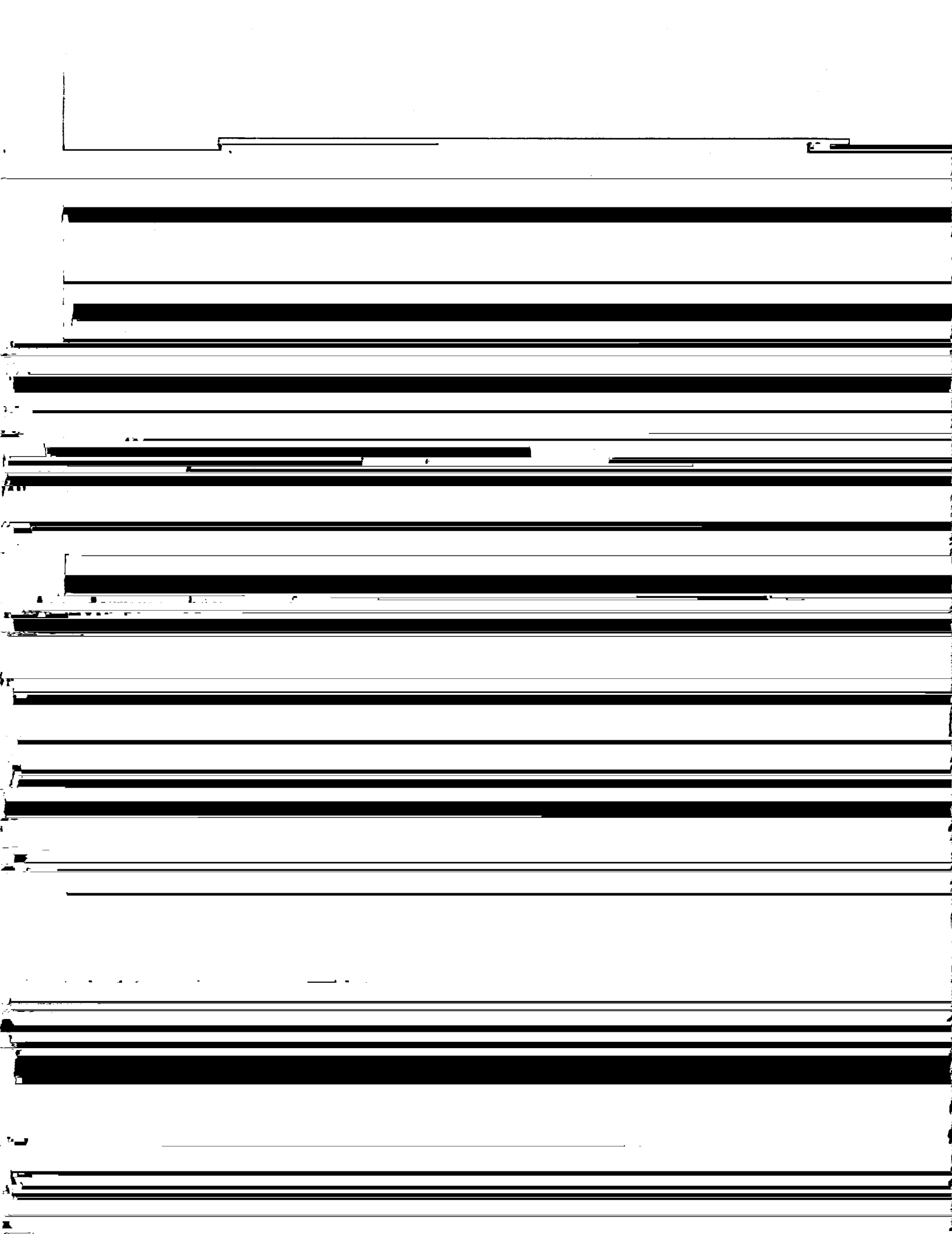
14 A: I do remember that.

15 Q: Okay.

16 ~~A: I remember just getting out of his way~~

- 1 Deposition transcript where you said, using a football
- 2 field as -- as a yardstick you thought it was less than a

1 I didn't -- my first thought was I don't want  
2 to get hit by this -- this truck carrying fuel.



1 Q: Okay.

2 Just want to -- go back to the Exhibit Number

3 2; Plaintiff's Exhibit Number 2. that you compiled



1 tracks. Do you remember that? And you probably would  
2 have to step behind it?