**Deposition outline**

1. **Ground Rule of Deposition:** 
   1. **You need to wait until I finish my question before answering the question**
   2. **Have you taken a deposition before?**
2. **Background Questions**
   1. **Medication or alcohol today?**
   2. **State your full name?**
   3. **DOB?**
   4. **Where were you born?**
   5. **What year did you move to US?**
   6. **What is your current address?**
   7. **Where did you live before this current address?**
   8. **Who lives with you-Wife, children, family members, roommates?**
   9. **What is their name and age of your children or roommates?**
3. **Work**
   1. **Where do you work?**
   2. **How long have you worked at this particular place?**
   3. **How much do you make per hour?**
   4. **At the time of the collision where you working with this employer?**
   5. **Because of the car crash, did you miss any workday?**
4. **Car crash:**
   1. **Where did start your trip and where were you planning to go at the time of crash?**
   2. **Tell me how the accident occurred?**
   3. **Did you speak with my client after the crash? If so, what did you say?**
   4. **Did you speak with the police officer? Who called the officer?**
   5. **Air bag deployed?**
   6. **Did any part of the car hit your body?**
   7. **Where you able to drive after the crash?**
5. **Injury**
   1. **What was your condition at the time of the crash?**
   2. **List all parts of your body that were injured? Neck, back, shoulder, headache?**
6. **Treatment**
   1. **Did you seek treatment after the crash?**
   2. **When did you see a provider?**
   3. **What is the name of the clinic?**
   4. **What was the last time you saw a provider for this crash?**
7. **Future**
   1. **What is your current condition?**
   2. **Do you have pain in your neck or back or headache?**
   3. **Do you have a plan to see a doctor in the future?**
8. **Prior & subsequent crashes or injury**
   1. **Have you had a car accident before or after this current accident?**
   2. **Did you have a work injury before or after this accident?**
   3. **Have you ever been injured because of a car accident or work injury? If so, when?**
9. **Hobby and Social Activities (Loss of Enjoyment)**
   1. **Did your injury prevents you from any activities or hobby you were doing before the crash?**
      1. **Yes. Playing succor, hiking, walking, playing with my kids?**

**Deposition notes of Girmay Welu 8.30.23**

**Gebremariam Gebremeskel**

**DOB: 04/20/1969**

**SSN:**

**Married? Askalu Meresa; 17 years**

**Married previously: Hirut Negash**

**Two: Mesfin Girmay: 12/8/1993**

**Samuel Girmay: 11/7/1996**

**Melat Girmay: 7/19/2002**

**Address: 4411 217 SW # C, Mountlaketrace**

**Does anyone live with you:**

**Education: High School Graduate in Ethiopia**

**USA: 1.19.1998**

**Work: Semi-truck driver**

**Employer- Sprit transport**

**How long: Since 2006**

**Wage Loss:** I didn’t work for the past 3 months

I didn’t miss work. However, I was working through pain.

Accident about 5 years ago:

-Low back and Neck Pain

Conviction: No

Insurance Claim# **Other than 3 claims**

Driver License?

Traffic Citation: Yes. Car Accident-Small

Cargo: I don’t remember what it was?

Passanger: No

Where were you going: Seattle To Everett

Cell phone- 2066978842

Where you using your cell phone? No

Cell phone provider? T-mobile

When the last time you used your cell phone?

Wheather?

Light out?

Traffic condition? Good

How far did you travel

Did you see before the impact? No

Did any part of your body struck: Streeing wheel:

How far did the defendant’s

After the impact, where the defendant’s vehicle go.

Where you forced out of your lane?

Air bag deploy

What happen after the collision?

The defendant stated that he felt asleep?

First aid?

The pain was not sharp. He was working the whole day.

Injury:

1. Right shoulder
2. Chest
3. Right neck
4. Minor pain in my neck

I don’t have neck and chest pain now

Right shoulder pain now is very painful: