

BEFORE THE WORKERS' COMPENSATION APPEALS BOARD
FOR THE STATE OF CALIFORNIA

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AYSHA CHAUDHUARY,)	
)	
Applicant,)	
)	
vs)	Case No: ADJ15843912
)	
RUAN TRANSPORT CORPORATION;)	
LIBERTY MUTUAL INS., CO. C/O)	
HELMSMAN MANAGEMENT SERVICES,)	
INC.,)	
)	
Defendants.)	
_____)	

DEPOSITION OF
AYSHA CHOWDHUARY
TUESDAY, JULY 26, 2022
VICTORVILLE, CALIFORNIA

REPORTED BY:
GRACE SCHMIDT,
RMR, CSR NO. 8149
JOB No. 835475

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FOR THE STATE OF CALIFORNIA

AYSHA CHAUDHUARY,)
 Applicant,)
 vs)
 RUAN TRANSPORT CORPORATION;)
 LIBERTY MUTUAL INS., CO. C/O)
 HELMSMAN MANAGEMENT SERVICES,)
 INC.,)
 Defendants.)

Case No: ADJ15843912

DEPOSITION OF AYSHA CHOWDHUARY,
taken on behalf of Defendants, at 15428 Morada Road,
Victorville, California, scheduled at 10:00 a.m.,
Tuesday, July 26, 2022, before Grace Schmidt, RMR, CSR
No. 8149, within and for the State of California,
pursuant to notice.

1 A P P E A R A N C E S:

2

3 FOR THE APPLICANT:

4 WORKERS DEFENDERS LAW GROUP
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8

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10

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E X H I B I T S

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None

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UNANSWERED QUESTIONS

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None

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INFORMATION REQUESTED

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None

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1 VICTORVILLE, CALIFORNIA, TUESDAY, JULY 26, 2022

2 10:11 a.m.

3 ---o0o---

4

5 AYSHA CHOWDHUARY,

6 called as a witness on behalf of Defendants, having
7 been first duly sworn, was examined and testified as
8 follows:

9

10 THE COURT REPORTER: My name is Grace
11 Schmidt. I am a certified shorthand reporter.

12 This deposition is being held via video
13 conferencing equipment.

14 The witness and the reporter are not in the
15 same room.

16 The witness has been sworn in remotely
17 pursuant to agreement of all parties.

18 Do the parties stipulate that the witness'
19 testimony is being given as if sworn in person?

20 So stipulated?

21 MR. KARBASSYOON: Stipulated.

22 THE COURT REPORTER: I didn't hear a
23 response. Miss Foley, I didn't hear a response.

24 MS. FOLEY: So stipulated.

25 THE COURT REPORTER: Thank you so much.

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EXAMINATION

BY MR. KARBASSYOON:

Q. Please state your name for the record.

A. Aysha. Me?

Q. Yes, ma'am.

A. Aysha Chowdhuary.

Q. And how do you spell Chowdhuary?

A. C-H-O-W-D-H-U-A-R-Y.

Q. Have you ever gone by any other names?

A. No.

Q. Have you ever been married?

A. No.

Q. Prior to the commencement of this deposition, applicant's counsel and the applicant have advised me that there was an error in the pleadings on this case, and the applicant's last name was spelled erroneously as C-H-A-W-D-H-U-A-R-Y.

And applicant's attorney has advised that they will amend the application to reflect the correct name.

MR. KARBASSYOON: Is that correct, ma'am?

MS. FOLEY: Yes, that's correct.

MR. KARBASSYOON: Okay. Very good.

Additionally, the applicant was kind enough to produce her California driver's license, and her

1 identity for purposes of today's deposition has been
2 confirmed.

3 And she was kind enough to also provide her
4 Social Security number prior to the commencement of the
5 deposition.

6 Thank you, ma'am.

7 BY MR. KARBASSYOON:

8 Q. All right.

9 Have you ever had your deposition taken
10 before today, Mr. Chowdhuary?

11 A. No.

12 Q. Did you spend any time preparing with your
13 attorney for today's proceeding?

14 A. Yes.

15 Q. And approximately how much time did you spend
16 preparing for today's deposition?

17 A. Like, about 50 minutes.

18 Q. Fifty? Five zero?

19 A. No. Like, five zero.

20 MR. KARBASSYOON: Okay.

21 Counsel, does that sound about right?

22 MS. FOLEY: Yeah, 50 minutes.

23 BY MR. KARBASSYOON:

24 Q. And are you appearing for the deposition at
25 your home?

1 A. Yes.

2 Q. All right.

3 And do you reside at 15428 Morada Road,
4 M-O-R-A-D-A Road, in Victorville?

5 A. Yes.

6 Q. Do you have access to any vehicles at your
7 current address?

8 A. Yes.

9 Q. How many?

10 A. Three.

11 Q. And do you know the year, make, model, and
12 color of each of those?

13 A. Not makes, or like -- I am going to say, no.
14 Like as -- I know some of them, but not all.

15 Q. Okay. Let's go with the ones you do know.
16 What's the year of the car that you do know?

17 A. My -- it's a Malibu.

18 There is a Chevy Malibu. That's a 2013.
19 Mazda, 2013, CX-5.

20 Q. And the other one?

21 A. An Infiniti.

22 Q. Is it a sedan or an SUV?

23 A. Sedan.

24 Q. And do you know the color of the Infiniti?

25 A. Black.

1 Q. What's the color of the Mazda?

2 A. The Mazda is the white one.

3 Q. And the Chevy?

4 A. That's grayish.

5 Q. Okay.

6 And are all of these vehicles automatic
7 drive, or are they manual drive?

8 A. They're automatics.

9 Q. Okay. All right.

10 Ms. Chowdhuary, my name is Naveed
11 Karbassyoon. I am a defense attorney with the law firm
12 of Wai, Connor & Hamidzadeh representing the interests
13 of the defendants in this case, Ruan Transportation.

14 It is a pleasure to make your acquaintance
15 here today.

16 Now, basically, what we are here to do is to
17 take your deposition. And what that is, is an
18 opportunity for me to hear your side of what happened.

19 Okay?

20 A. Okay.

21 Q. All right.

22 Now, at the risk of being redundant, insofar
23 as repeating some of the instructions that I know your
24 attorney has given you, I am going to lay the ground
25 rules for the deposition one more time.

1 Okay?

2 A. Okay.

3 Q. Please listen to each question that I ask you
4 carefully, and once I am done asking my question, give
5 me your best and most accurate answer.

6 All right?

7 A. Okay.

8 Q. All right.

9 Now, there is three reasons why I need for
10 you to allow me to finish asking my questions before
11 you offer a response.

12 The first reason being, is I need to make
13 sure that you understood the questions that I have
14 asked in the manner in which I have asked it.

15 Now, if you offer a response halfway through
16 my question, I won't really be able to determine if you
17 understood it.

18 Does that make sense?

19 A. Kind of.

20 Q. Okay.

21 Now, if I ask you a question and halfway
22 through, you offer a response, and I wasn't done asking
23 my question, is there any way to really know if you
24 understood the full question that I was going to ask?

25 A. No.

1 Q. That's what I mean.

2 Does that make sense?

3 A. Okay. Yes.

4 Q. All right.

5 Now, if anything that I ask you here today
6 comes out unclear, or is confusing to you, or just by
7 virtue of it being over Zoom, cuts out, you let me
8 know. I will happily repeat it or rephrase it for you.

9 Okay?

10 A. Okay.

11 Q. But if you do answer a question, it will be
12 presumed that you understood, heard it, and it was
13 clear.

14 Okay?

15 A. Okay.

16 Q. All right.

17 Second reason being is, somewhere on the
18 screen that you are looking at is a certified shorthand
19 court reporter. And it's her duty and an obligation to
20 take down everything that we say to one another.

21 So it's very important for you to let me
22 finish talking before you speak, because it makes it
23 very difficult for the court reporter to do her job if
24 we talk over one another.

25 Is that fair?

1 A. Yes.

2 Q. All right. Very good.

3 Third reason being, once again, on the screen
4 that you are looking at, your attorney is sitting there
5 and listening to the questions that I am asking you
6 here today.

7 Now, she may object to a question that I
8 pose, or even tell you not to answer a question that I
9 pose, but if you offer an immediate response, her
10 objection or her instruction to you may be waived.

11 That's another reason why I need for you to
12 wait for me to finish.

13 Okay?

14 A. Okay.

15 Q. All right.

16 Now, I don't want you to guess at anything,
17 but I am entitled to your best estimate.

18 Do you know the difference between a guess
19 and an estimate?

20 A. Yes.

21 Q. All right. Very good.

22 I am not here to trap or trick you. As I
23 said before, this is just my opportunity to hear from
24 you what happened.

25 Okay?

1 A. Okay.

2 Q. The court reporter is here to take down
3 everything that is being said and put it into what is
4 called a deposition transcript.

5 It's a booklet that contains all of my
6 questions, any of your responses, any of your
7 attorney's objections, instructions, or questions, and
8 your responses to that.

9 Okay?

10 A. Okay.

11 Q. Now, stick with clear, concise verbal
12 answers. Try to stay away from "uh-uh," "huh-huh,"
13 nods of the head, shakes of the head, things like that.

14 Okay?

15 A. Okay.

16 Q. Just so you know, you have been doing
17 excellent so far. So, if you keep it up, we will be
18 going through this just fine.

19 Okay?

20 A. Okay.

21 Q. All right.

22 If you point to a part of your body, please
23 verbally identify what part of the body you are
24 pointing to, so we have a clear record.

25 However, don't worry if you forget. Your

1 attorney and myself will do our best to help you
2 identify it for you.

3 Okay?

4 A. Okay.

5 Q. Very good.

6 Now, once the deposition is concluded, you
7 will have an opportunity to review the transcript and
8 make any additions, deletions, or changes that you see
9 fit.

10 However, just as a notice to you, if you do
11 make any additions, deletions, or changes, it may
12 affect your credibility if we proceed to trial.

13 Does that make sense?

14 A. Yes.

15 Q. Very good.

16 All right. Do you have any questions for me
17 before we get started?

18 A. No.

19 Q. Okay.

20 Have you taken any medications, like
21 painkillers or sedatives, that would make it difficult
22 for you to understand the questions I am posing to you
23 here today?

24 A. No.

25 Q. Have you had any alcoholic beverages in the

1 last 24 hours?

2 A. No.

3 Q. Do you believe you can competently testify
4 here today?

5 A. Yes.

6 Q. Very good.

7 Okay. Do you have pain in any body parts, as
8 you sit here today?

9 A. Yes.

10 Q. What body parts?

11 A. My knee.

12 Q. Which knee? Right or left?

13 A. My left knee.

14 Q. Anywhere else you have pain?

15 A. Not at this moment, no.

16 Q. Okay.

17 Now, in the last 30 days, to the extent that
18 you can recall --

19 I know some people -- most people don't have
20 a diary of every pain and discomfort they have, but to
21 the extent that you can recall, have you had pain in
22 your left knee in the last 30 days?

23 A. Yes.

24 Q. Have you had pain in any other body parts in
25 the last 30 days?

1 A. Yes.

2 Q. What other body part or parts have you had
3 pain in?

4 A. On my right knee.

5 Q. Anywhere else?

6 A. No.

7 Q. Okay.

8 MR. KARBASSYOON: Let's go off record for
9 just one second.

10 (Discussion off the record).

11 BY MR. KARBASSYOON:

12 Q. All right.

13 Now, before we went off the record for that
14 discussion right there, you mentioned in the last 30
15 days you have had pain in your left knee and right
16 knee. Is that correct?

17 A. Yes.

18 Q. Is there any other body part you've had pain
19 in, in the last 30 days, other than those knees?

20 A. No.

21 Q. Okay.

22 Now, which knee hurts more, generally, the
23 left or the right?

24 A. My left.

25 Q. All right.

1 And if you could estimate, how often do you
2 feel pain in your left knee?

3 A. Occasionally.

4 Q. And what about your right?

5 A. Depending on how long I am on it.

6 Q. So, okay, let's take a step back.

7 When you say you feel pain in your left knee
8 occasionally, so in a given week, seven days, how many
9 days would you say you have pain in your left knee?

10 A. Every day.

11 Q. And does the pain -- is it always present, or
12 does it come and go?

13 A. Come and go, like, throughout the day.

14 Q. Got it.

15 And when you feel the pain throughout the
16 day, how long does it last for, if you could estimate?

17 A. If I have to estimate, eight hours. About
18 eight hours.

19 Q. Is there anything that you do to aid you in
20 coping with the pain? Like, take medicine, stretch,
21 ice, heat, anything like that?

22 A. I'm sorry. Could you repeat that? That one
23 came out fragmented.

24 Q. No worries. That's okay.

25 Is there anything that you take to aid you in

1 coping with the pain and discomfort in your left knee?

2 A. Yes.

3 Q. What do you take?

4 A. Naproxen.

5 Q. Okay.

6 What about your right knee? Do you feel pain
7 in your right knee, every day?

8 A. No.

9 Q. How often, in a given week, would you
10 estimate you feel pain in your right knee?

11 A. A couple of days, depending on how active I
12 am.

13 Q. Now, when you say "active," what would you
14 characterize as being active enough to have pain in
15 your right knee, if you could estimate that?

16 A. Can you repeat that?

17 Q. Of course.

18 You said that you feel pain in your right
19 knee depending on how active you are. So my question
20 to you is, what would you characterize as being active
21 enough to warrant pain in your right knee?

22 A. Walking, in general. But, like, how long I
23 am walking for.

24 Q. How long would you have to walk before you
25 have pain in your right knee?

1 A. About after, like, three hours.

2 Q. Now, is this, like, with a hike, or in what
3 instance are you walking for three hours?

4 A. Shopping.

5 Q. All right.

6 Now, is there any other activity you engage
7 in that results in you having pain in both of your
8 knees, other than walking for three hours?

9 A. Besides work, no.

10 Q. Okay. What's your date of birth?

11 A. April 4th, 1994.

12 Q. And where were you born?

13 A. California.

14 Q. The city?

15 A. Anaheim.

16 Q. Have you resided in the state of California
17 since your birth?

18 A. Yes.

19 Q. Okay.

20 What's your highest level of education?

21 A. An associate's.

22 Q. Associate's degree in what?

23 A. Computer integrated design and graphics.

24 Q. When did you get that degree?

25 A. 2016, I believe.

1 Q. Have you ever been in the military?

2 A. No.

3 Q. Are you currently a member of a union?

4 A. No.

5 Q. Have you ever been a member of a union?

6 A. No.

7 Q. Was that a cat?

8 A. No. I'm sorry. It was my hiccups.

9 Q. Okay. Sorry. I was looking up.

10 My apologies. I don't mean to offend you at
11 all.

12 A. That's okay.

13 Q. Okay. Have you ever had any children?

14 A. No.

15 Q. Have you ever been convicted of a felony?

16 A. No.

17 Q. Have you been incarcerated in the last seven
18 years?

19 A. No.

20 Q. Are you currently employed?

21 A. Yes.

22 Q. By whom?

23 A. Ruan.

24 Q. And are you presently off of work right now,
25 or are you losing time from work to be here today?

1 A. I am off work.

2 Q. And how long have you been off of work from
3 Ruan?

4 A. For about six months.

5 Q. Has any doctor indicated that you would be
6 permitted to return to work, in either a full or
7 modified capacity?

8 A. Modified.

9 Q. And what doctor was that?

10 A. The name escapes me. I believe, Elias.

11 Q. Is it Dr. E-L-I-A-S?

12 A. Yes.

13 Q. And what modified duties did Dr. Elias, or
14 Elias, indicate to you?

15 A. Like, climbing stairs. But that's
16 particularly part of my job, so.

17 Q. Okay. Hold on one second.

18 When you say "climbing stairs," do you mean
19 you are prohibited from climbing stairs?

20 A. Yes.

21 Q. Okay.

22 And then when you indicated it was part of
23 your job, do you mean that since you can't climb
24 stairs, you can't go back to work?

25 A. Again?

1 Q. Yeah. Of course.

2 Since you are not -- since you are prohibited
3 from climbing stairs, does that mean that you cannot
4 return to work in your modified capacity?

5 A. No, I can't.

6 Q. Okay.

7 And what aspect of climbing stairs is part of
8 your job?

9 A. Getting in and out of the truck.

10 Q. When was the last time you have seen
11 Dr. Elias, or Elias?

12 A. I saw him in --

13 It's been a long time. I can't really give
14 you an exact date unless I have my paperwork.

15 Q. Okay.

16 I have April 1st, 2022 as the most recent
17 report that I see here.

18 Have you seen the doctor since then?

19 A. Have I seen Dr. Elias since then?

20 Q. Yes, ma'am.

21 A. I am not sure.

22 Q. Hold on one second.

23 A. From that date, I am not sure.

24 Q. Oh, I'm sorry. I also have a May 3rd, 2022.
25 So, about two months ago.

1 Does that sound about right?

2 A. May 3rd sounds closer.

3 Q. Okay.

4 Now, do you recall the doctor indicating that
5 you have reached something called maximum medical
6 improvement?

7 A. Max -- can you repeat that? Max.

8 Q. Did the doctor indicate to you that you have
9 reached something called maximum medical improvement,
10 or permanent and stationary status?

11 A. I am not familiar with those terms.

12 Q. That's okay.

13 Do you recall the doctor telling you that you
14 have a certain level of whole person impairment?

15 A. No.

16 Q. Okay.

17 Has any doctor indicated that you are a
18 candidate for surgery on either of your knees?

19 A. Yes.

20 Q. And which doctor told you that you need to
21 have surgery?

22 A. Dr. Elias. Elias.

23 Q. When did this doctor tell you that you need
24 to have surgery?

25 A. The first time I saw him.

1 Q. And approximately when was that?

2 A. I don't know, exactly. It's been a minute.

3 Q. Okay.

4 Now, did you see the doctor following a
5 work-related injury?

6 A. I don't understand that.

7 Q. Did you -- were you referred to Dr. Elias
8 after you had an injury at work?

9 Do you need me to repeat or rephrase it?

10 A. Can you rephrase that?

11 Q. Yeah. Of course.

12 Did you sustain an injury while working at
13 Ruan?

14 A. Did I --

15 Okay. I understand all but that other word.
16 Assist?

17 Q. Did you hurt yourself while working at Ruan?

18 A. Yes.

19 Q. Is the audio coming out really fragmented for
20 you?

21 A. I cannot understand. You said "assist"?
22 Like, there are some words that I can't
23 understand.

24 Q. That's okay.

25 No. No. That's all right. Thank you for

1 asking me to clarify.

2 Q. Do you remember when you got hurt at Ruan?

3 A. In November.

4 Q. Do you remember the date in November?

5 A. The 9th.

6 Q. And was that in 2021?

7 A. Yes.

8 Q. All right.

9 So when you first saw Dr. Elias, it was some
10 point after November 9th, 2021. Is that right?

11 A. Yes.

12 Q. Okay.

13 Prior to November 9th, 2021, had you ever
14 seen a doctor to treat either of your knees?

15 A. Prior to --

16 Q. November 9th, 2021?

17 A. No.

18 Q. Okay. All right.

19 How long have you been living at your current
20 address in Victorville?

21 A. I moved back here. So it's been like two
22 years. About two years.

23 Q. And do you live there alone, or do you live
24 there with other people?

25 A. Others.

1 Q. Who else lives at the home with you?

2 A. My parents.

3 Q. Anyone else.

4 A. That's it.

5 Q. Okay.

6 And to the extent that you know, are your
7 parents in good health?

8 A. I mean, they are old, so.

9 Q. Does that mean so-so? They are so-so, in
10 health?

11 A. So-so, I guess, but --

12 Q. Do either --

13 A. They have --

14 Q. Go ahead.

15 A. I'm sorry.

16 I was going to say they have old people
17 problems. So, sorry.

18 Q. That's okay.

19 MR. KARBASSYOON: Off the record just for one
20 second.

21 (Discussion off the record).

22 BY MR. KARBASSYOON:

23 Q. Now, since you have asserted an orthopaedic
24 injury, this question is very narrow in its inquiry.
25 So just try to stick with this question here.

1 Do either of your parents need physical
2 assistance from you to get around the house?

3 A. No.

4 Q. Did either of your parents need physical
5 assistance from you to move around, generally, outside
6 of the house?

7 A. No.

8 Q. Okay. All right.

9 And the home that you live in, is it a
10 single-family home? Is it an apartment? Condo? What
11 is it?

12 A. A single-family home.

13 Q. Are there stairs inside the property, or to
14 get into the property?

15 A. There is a step, but I don't know if you --
16 It's just a step.

17 Q. Do you mean the step that's from --

18 A. It's not a stair.

19 Q. My apologies.

20 A. It's not a stair where --

21 Sorry.

22 Q. That's okay.

23 Do you mean, is it just one step to get into
24 the property?

25 A. Yeah.

1 Q. Okay.

2 Now, going up that step to get into the
3 property, does that cause you to have physical pain?

4 A. No.

5 Q. And do you feel that you, in your own
6 opinion, are capable to safely go up that step, into
7 the property?

8 A. Yes.

9 Q. Okay.

10 Prior to your residence at the current
11 address that you're at, where did you live?

12 A. Ely, Nevada.

13 Q. Can you spell Ely for me, please?

14 A. E-L-Y.

15 Q. And before that?

16 A. Well, there is two addresses in Nevada. One
17 was in North Las Vegas. I can't give you the address,
18 address, but --

19 I don't remember. I just know it was on,
20 like, Azure.

21 Q. And that's A-J-U-R-E?

22 A. A-Z-U-R-E.

23 Q. All right.

24 So you lived in Ely, Nevada; North Las Vegas,
25 Nevada. And before that?

1 A. Back at this address.

2 Q. Okay.

3 And before this address, did you live
4 anywhere else, that you can recall?

5 A. Yeah. In Apple Valley.

6 Q. And before that?

7 A. Moreno Valley.

8 Q. And before that?

9 A. That's all I have.

10 Q. Okay.

11 All right. Now, this next portion, we are
12 going to go over your employment history. So let's
13 start with Ruan, and then work our way backwards.

14 Okay?

15 A. All right.

16 Q. When did you first get hired at Ruan?

17 A. It was either, June or July.

18 Q. Of what year?

19 A. Last year. 2021.

20 Q. Now, since June or July of 2021 to the
21 present, have you worked with any other company or
22 entity, other than Ruan?

23 A. Last year, yes. Prime.

24 Q. I mean from June of '21 to today. In between
25 that period.

1 A. Oh, no.

2 Q. Okay. All right.

3 Now, so you said, Prime. Is that a trucking
4 company?

5 A. Yeah.

6 Q. And when did you work for Prime? Your start
7 and finish date, if you can estimate that?

8 A. So from June and July, back. It would be,
9 like a year of service with them.

10 Q. So approximately, the summer of 2020?

11 A. I'd say, like, officially, like, with like --
12 after, like, the training, it would be in August.

13 Q. And what about before training?

14 A. It's, like, six weeks of training.

15 Q. So it would be about July or June of 2020?

16 A. Yes.

17 Q. Okay. And before Prime, where did you work?

18 A. Before Prime, I worked at Ely State Prison.

19 Q. Okay.

20 And do you know the start -- when you started
21 there?

22 A. I'd basically say, then, I would say sometime
23 in March.

24 Q. Of what year?

25 A. I can't give you the year unless I do the

1 math.

2 Q. Well, how many years were you working there?

3 A. A year.

4 Q. Okay.

5 So if you were working there a year, this
6 would be March of 2019?

7 A. It's possible. If it adds up, yeah, that's
8 possible, because it could be.

9 Q. Okay. That's fine.

10 And before Ely State Prison?

11 A. Amazon.

12 Q. How long were you working at Amazon?

13 A. So that was, like, a short period for Amazon.
14 Probably, like a month.

15 Q. And before Amazon?

16 A. Give me one moment. I am trying to --

17 Q. Sure. Take your time.

18 A. Amazon. No, that was the Amazon --

19 I think I worked for that one a year, because
20 I worked at Amazon, twice. But at one moment it was
21 brief.

22 Q. The one year it was brief?

23 A. No. One year it was brief. Like, I only
24 worked there for a month. But then, like, that one
25 year I worked there for a year and a few months.

1 Q. Okay.

2 And then -- so let's go with the most recent
3 stint you had at Amazon.

4 Before that, where did you work?

5 A. Before Amazon, it would be Pizza Hut.

6 Q. And before Pizza Hut?

7 A. Pizza Hut was my first job.

8 Q. Got it.

9 A. That I remember.

10 Q. And how long did you work at Pizza Hut?

11 A. A year and a few months, approximately.

12 Q. Okay. All right. Just one second.

13 All right. Now, what was your duty with
14 Ruan? What was your job title?

15 A. A yard jockey.

16 Q. What about with Prime Trucking?

17 A. A truck driver. OTR.

18 Q. What does "OTR" stand for?

19 A. Over the road.

20 Q. All right.

21 What are the duties of a yard jockey working
22 for Ruan from 2021 to present?

23 A. So what I did is I'd back up trailers into
24 the warehouse doors. We would run back the locks.

25 They are, like, safety locks.

1 Q. Okay. Anything else?

2 A. Yeah. It's just been a minute.

3 At the start of the day we would --

4 It's easier for me, like, to go from the
5 beginning of the day until, like, pretty much how the
6 end of the day works.

7 We would do an inspection. And then we get
8 our loads on the computer. And then just go by those
9 loads.

10 And we would go in to try to get out the
11 truck to, like, open and unlock the trailer doors.

12 And then back up into the trailers doors.
13 Run back locks, back and forth.

14 That pretty much took the whole day. And we
15 do that multiple times.

16 Q. Okay.

17 So when you said "inspection," what are you
18 inspecting?

19 A. The truck.

20 Q. And how are you inspecting it?

21 A. They gave us a list.

22 Q. Are you inspecting the items in the truck?

23 Are you inspecting the brakes, tires, and
24 stuff like that? What are you doing?

25 A. Yeah, make sure, like, the tires aren't flat,

1 and it's, like, in working order.

2 But we can't, like, actually go underneath
3 the truck. That's the maintenance guys.

4 But we just make sure, like, what we use for
5 everyday duties is properly functioning. Make sure
6 that the truck is going to start. The equipment is
7 there.

8 Q. And the entire time that you are doing this
9 inspection, you're walking around the truck?

10 A. Yes.

11 Q. Okay.

12 And do you actually, physically drive the
13 truck after this inspection?

14 A. Yes, we drive it. It's part of the job.

15 Q. Okay.

16 So you start your day. You go to your
17 computer. You --

18 Well, you inspect the truck first; correct?

19 A. We start our day. We pick up the truck,
20 because they park it.

21 And we bring it to the front office to get
22 our paper to actually inspect the truck.

23 Q. Okay.

24 And then after you get the papers to inspect
25 the truck, what happens next, immediately after that?

1 A. We inspect the truck.

2 Q. Okay.

3 After you inspect the truck, what happens
4 then?

5 A. Turn in the papers. And then check the
6 computer to see what our first load is.

7 And just, that's the whole day. We look at
8 that computer and do our loads. Make sure, you know,
9 to back them up into the doors.

10 Q. Okay. So, then --

11 All right. You check the computer. Is this
12 computer inside the truck, or is this a computer at the
13 warehouse, or somewhere?

14 A. Inside the truck.

15 Q. Okay.

16 And then the computer tells you the load that
17 you have. Is this load already loaded into a trailer,
18 or do you have to, then, go -- back the truck up and
19 get the truck loaded?

20 A. So it shows us, like, the trailer number and,
21 like, we have, like, we make sure, like, the part. So
22 we back into those trailers to take them to the door.

23 While we take them to the door, we have to
24 get out and open them, secure them, and then back them
25 in to the actual door.

1 Q. Now, is the trailer located in the same lot
2 where the door is that you need to back it into?

3 A. Not all the time.

4 Q. Okay.

5 So, then, you have to drive the truck
6 somewhere. Wherever the door is that you need to go.

7 You back the trailer in. And then what
8 happens?

9 A. Unhook the -- get the security lock so that
10 the other, like, truck can back in there and, like,
11 move it, like, for, like, safety purposes.

12 Q. So which one do you lock? Do you lock the
13 trailer, or do you lock your truck?

14 A. We lock the trailer. There is, like, the air
15 line that you put, like, it on and it, like, prevents
16 it from hooking up to it.

17 Q. Okay. Oh, I understand.

18 So you unhook from the trailer. Then you put
19 the safety lock wherever the latch would go for the
20 trailer; correct?

21 A. Yeah. And then you would take out the key
22 and put it back in, and put it in, like, the box, and
23 it will turn red for them on the other side so that
24 they can go inside. And it's green for us if it's safe
25 to take out.

1 Q. Got it.

2 And, then, is the trailer loaded, at that
3 point?

4 A. When we are backing it in, yeah, the trailer
5 is loaded. And we take it to the door.

6 Q. Okay.

7 And then what happens after it is at the
8 door, and you are unhooked from it?

9 A. We look for the next load.

10 Q. Got it.

11 Okay. And so do you have any role in
12 unloading the trailer, at all?

13 A. No, I don't unload it. That's the warehouse.
14 We just open up the doors.

15 Q. Oh, got it.

16 So you have to physically open the trailer
17 door for the warehouse crew to come and unload the
18 trailer; correct?

19 A. To unload it, yes.

20 There is two types of doors. So, like,
21 the -- there is loads that they can unload, but then
22 there is ones that we have to open and secure,
23 ourselves.

24 Q. Okay.

25 MS. FOLEY: Counsel, I apologize.

1 Can I take a very short five-minute break.

2 MR. KARBASSYOON: Of course. Let's go off
3 the record.

4 (Break).

5 BY MR. KARBASSYOON:

6 Q. Before we went off the record you had been
7 describing the job duties you had as a yard jockey for
8 Ruan.

9 Do you recall?

10 A. Yes.

11 Q. Okay.

12 Other than inspecting your truck, going on
13 the computer to get your loads, going and getting your
14 trailer, backing it into the warehouse door, putting on
15 the safety locks, and opening the back of the trailer,
16 are there any other duties that you had while working
17 as a yard jockey for Ruan?

18 A. They had these forms. So, like, if we see,
19 like, debris or anything like that, we would report
20 that on the forms.

21 Q. Is this debris while you were driving?

22 A. Like, debris at the door. Like, if it was
23 just dirty and they needed, like, someone to come over
24 and clean it up.

25 Q. And when you say "the door," do you mean the

1 door of the trailer? The door of the truck? Where?

2 A. The warehouse door. Like the big door where
3 we back the trailer into. So it's like the opening.

4 It looks like a garage door, if anything.

5 Q. All right.

6 Any other duties that we haven't discussed
7 yet?

8 A. Nothing I can remember at the moment.

9 Q. All right.

10 What about any duties requiring you to do any
11 kind of cleaning?

12 A. The inside of our truck. Like if we had,
13 like, whatever drink we had, or something. Like our
14 water, like, had, like, bottles in it.

15 Like wipes to wipe down, like, the seats and
16 the steering wheel.

17 Q. And did you like the work that you did with
18 Ruan?

19 A. Yes.

20 Q. If permitted to return to work in a full
21 capacity, or in a capacity that would be accommodated
22 by the employer, would you have an interest in going
23 back to work?

24 A. Yes.

25 Q. Did you get along with your coworkers and

1 your supervisors?

2 A. Yes.

3 Q. How much were you earning per hour while
4 working with Ruan?

5 A. I believe it was 26 an hour.

6 Q. How many hours would you work a week?

7 A. Forty hours.

8 Q. All right. Other than the injury that you
9 had on November 9th, 2021, had you ever sustained any
10 other injuries while working at Ruan?

11 A. No.

12 Q. Can you describe what happened on November
13 9th, 2021?

14 A. Yes.

15 Q. What happened?

16 A. At the time of injury?

17 Q. Yeah. Sure.

18 A. So I picked up a load. And before we backed
19 the trailer into the door, it was a swing door, so I
20 had to go back there and secure the doors.

21 But when I went back there, the pallet fell
22 out. When opening the doors, the pallet all of a
23 sudden fell out, and I had to back away. Otherwise, I
24 would get hit. And in the process, I hurt my knee.

25 Q. All right. Hold on one second.

1 So you're in the truck. You're backing it up
2 to the warehouse door; correct?

3 A. No.

4 Q. What happened?

5 A. We have to open the door before we back it
6 up. So I have to get out of the trailer. Open up the
7 trailer doors and secure them to the side before we can
8 actually back them up into the door.

9 Otherwise, they can't get to the merchandise.

10 Q. Okay.

11 When you say "swing doors," are those the
12 doors that open outward?

13 A. Yes.

14 Q. Okay.

15 So you stopped the truck. You get out. Go
16 to the back.

17 Did you open both doors, or just one door?

18 A. It only opens up one door at a time. It
19 doesn't open up, like, there is like two, or something,
20 but it latches on one side, and then the other side you
21 can open.

22 But that first latch, like, it popped open.

23 Like, going to open the door, it just swung
24 open, like, and the pallet fell out.

25 Q. Okay.

1 And do you know what the contents of that
2 pallet was?

3 A. Some type of liquid. Because I saw there was
4 some liquid on the floor after the pallet fell.

5 Q. Did the entire pallet fall on you, or how
6 did -- did it hit you, at all? Did you move out of the
7 way? What happened?

8 A. I moved out of the way. The pallet didn't
9 make contact with me. But in the process of moving out
10 of the way, I hurt my knee.

11 Q. All right.

12 And sorry. We are going to have to take a
13 step back again?

14 A. Okay.

15 Q. I just want to get a picture. I kind of have
16 an idea as to what was going on at that time.

17 So you open up one of the doors. And before
18 you can even open it, it swings open and the pallet
19 falls out; correct?

20 A. Yes, it swings open. The pallet fell out.

21 Q. So you get out of the way.

22 And then what happens that leads you to
23 believe that you injured your knee?

24 A. Oh, my knee popped. Like, I felt it. Like
25 that feeling is like --

1 Q. Did you twist? Did you bend it funny? How
2 did it pop?

3 A. I bent it funny and, like, it popped, like,
4 right at the knee.

5 Q. Was this your left knee?

6 A. Yes.

7 Q. Okay.

8 And then after you felt the knee pop, what
9 did you do?

10 A. I contacted the lead. Let him know what
11 happened, because someone has to pick up the stuff,
12 too. But I was injured. So I told him.

13 Q. Who was your lead?

14 A. Brandon.

15 Q. And what's Brandon's last name, if you know
16 it?

17 A. I don't know it.

18 Q. And when you contacted Brandon, what did
19 Brandon say?

20 A. Call a supervisor, I believe.

21 Q. Did you call your supervisor?

22 A. I text messaged him. And I think I called
23 him, too.

24 Q. And what is your supervisor's name?

25 A. Jesus.

1 Q. Do you know Jesus' last name?

2 A. I don't remember his last name.

3 Q. And were you able to speak with, or text with
4 Jesus after that?

5 A. Yes.

6 Q. And what did he say?

7 A. He gave me a number for -- it was like an
8 operator number for, I guess, work injuries, they call
9 it.

10 Q. And did you call this operator number for
11 work injuries?

12 A. Yes.

13 Q. And what happened? What did they tell you?

14 A. They, basically, scheduled me to get seen by
15 a doctor via Telemed.

16 Q. And then what happened after that?

17 A. I know I waited for a while. And then they
18 sent me home. I guess they got some type of
19 authorization.

20 Q. The whole time where you are calling Jesus,
21 your lead, and this number for work injuries, were you
22 still at the yard with your truck and trailer?

23 A. Yes. I was unhooked from the trailer at that
24 point. They had me park by the main office. And
25 that's where I talked with the operator.

1 Q. Were you able to get into the truck,
2 unassisted?

3 A. Yes.

4 Q. All right.

5 And if you could estimate your pain level in
6 your left knee on a scale of zero to 10, zero being no
7 pain, 10 being the worst pain you've ever had, what
8 would you estimate your left knee pain to be at that
9 time?

10 A. About a six.

11 Q. All right.

12 And then were you able to proceed with that
13 Telemed visit for the doctor?

14 A. Yes. The next --

15 Well, I am not actually sure if it was the
16 next day, but I did get a Telemed call.

17 Q. All right.

18 And, generally speaking, when you seek out
19 medical care or attention, are you truthful and honest
20 with the doctors who are examining you?

21 A. Yes.

22 Q. And if you're feeling pain or discomfort in
23 any body part, or body parts, were you very clear to
24 the doctors as to what is bothering you?

25 A. Yes, I try to be.

1 Q. Okay.

2 And eventually, when you got the call, did
3 you speak to a medical professional the next day, or
4 whenever you participated in that evaluation?

5 A. I did.

6 Q. And do you recall whether or not they
7 informed you of what your diagnosis was at the time?

8 A. I believe it was a sprain in my knee.
9 That's what they put on the paper.

10 Q. That was a sprain of your left knee; correct?

11 A. Yes.

12 Q. Okay.

13 And were you scheduled to work after the 9th?

14 A. Let me think about it.

15 No.

16 Q. So November 9th was a Tuesday. November 9th,
17 2021 was a Tuesday.

18 Would you have been scheduled to work the
19 following Wednesday?

20 A. My regular schedule, yes.

21 Q. Okay.

22 So, then, did you miss work the following
23 day, or days?

24 A. Yes.

25 Q. Okay.

1 And when you were seen by the doctor for that
2 evaluation the following day, or a few days afterward,
3 and he diagnosed you with a sprain of your left knee,
4 did he indicate you can return back to work in a
5 modified capacity?

6 A. I don't remember.

7 Q. Did you get back to work, at any point, after
8 that?

9 A. Yes.

10 Q. And when did you return back to work after
11 that injury?

12 A. I know it was several weeks after. But I am
13 not sure of the exact date.

14 Q. Okay.

15 And when you returned back to work after that
16 date, did you go back off of work again?

17 A. Yes.

18 Q. How long did you work before you were taken
19 off again?

20 A. I don't remember. I think maybe, like, a
21 week, but I am not sure.

22 Q. Okay.

23 And since being taken off of work again, did
24 you ever go back to work after that?

25 A. No.

1 Q. All right.

2 Was there anyone there to witness the pallet
3 fall, and your injury, if you can recall?

4 A. No, not to my knowledge.

5 Q. And do you recall if you've ever undergone
6 any kind of diagnostic studies, like MRIs or X-rays of
7 your left knee?

8 A. Yes.

9 Q. And has any medical professional discussed
10 with you what the findings of those studies were?

11 A. Yes.

12 Q. Do you recall what the findings were of the
13 MRIs?

14 A. No. Not like in a technical term.

15 Q. Did any of them indicate that there was -- or
16 what do you recall of those diagnostic studies?

17 A. Like, I know they discussed it, but I wasn't
18 sure of, like, the technical term.

19 But I remember I asked them, like, multiple
20 times, but it's, like, hard to remember, like, a long
21 name of, like, a medical term.

22 Q. Sure. That's fair.

23 All right. Now, working for Prime Trucking
24 as a truck driver, were your duties any different than
25 that of a yard jockey with Ruan?

1 A. Yeah. I would say yes. Yeah.

2 Q. How so?

3 A. Well, it was over-the-road. So I go state to
4 state, rather than just staying in one yard.

5 Q. So walk me through your duties at Prime
6 Trucking?

7 A. Going to get the load. Like, driving to it.
8 And whether it was a drop and hook, or
9 waiting for it to be loaded into the trailer, I would
10 say that would be the difference.

11 And then taking it to where it needs to go.

12 Q. And Prime Trucking, did you drive a similar
13 type of truck that you drove for Ruan?

14 A. No.

15 Q. What kind of truck did you drive with Prime
16 Trucking?

17 A. Prime Trucking, I had a Freightliner.

18 Q. And Ruan?

19 A. Ruan is -- I forget the brand, but it's
20 different. As far as, like, the build and --

21 Q. Got it.

22 Did the Freightliner have a sleeping cabin,
23 or no?

24 A. Yes.

25 Q. Would you take these loads alone, or would

1 you have a driving partner?

2 A. I had a partner.

3 Q. Did your partner aid you in performing the
4 duties that you needed to perform for Prime Trucking?

5 A. Yeah, sometimes.

6 Q. Okay.

7 Now, would you also have the same duties
8 insofar as inspecting the truck or inspecting the
9 trailer, prior to transporting it?

10 A. Inspecting the truck and --

11 Can you repeat that?

12 Q. Would you have the same duties at Prime
13 Trucking as you had at Ruan in inspecting the trailer
14 and inspecting the truck, before you transported it?

15 A. Not fully the same duties.

16 Q. So how were they different from the
17 inspection aspect of it?

18 A. We have got to check the trailers that we
19 took in Prime to make sure, like, they are secured and
20 everything, before we transport them.

21 The majority of the time. Not all the time.
22 Because sometimes it's drop and hook and we pick up,
23 like, a trailer that's already loaded.

24 Q. Did you find the work at Prime Trucking to be
25 physically challenging?

1 A. No.

2 Q. Did you ever sustain an injury while working
3 at Prime Trucking?

4 A. No.

5 Q. Why did you stop?

6 A. I missed home. I missed having a bathroom to
7 go to, and not be on the side of the road at a weird
8 truck stop area.

9 Q. Any other duties requiring cleaning, while
10 working at Prime Trucking?

11 A. Yeah. Keeping our, like, cab clean.

12 But that's like a personal thing. You want,
13 you know, hygiene.

14 Q. Sure.

15 What about as far as securing the load? Once
16 the trailer is hooked, do you have any duties going
17 into the trailer, itself, to secure it?

18 A. Yeah, sometimes.

19 We had load locks that we would get. And we
20 would go in and secure the loads, using load locks.

21 Q. And what are load locks?

22 A. They are like bars that go across the -- from
23 one end to the other end on the side of trailers to,
24 like, press against the load so there is nothing
25 falling out, or moving or shifting during

1 transportation.

2 Q. So did you have the duties of securing the
3 loads at Ruan?

4 A. No.

5 Q. All right.

6 And at Ely State Prison, what were your
7 duties?

8 A. I worked in property.

9 Q. What does that mean?

10 A. It meant inspecting inmate property to see if
11 it met guidelines, if they could have it at that
12 institution, or it needed to be repelled, and then
13 distributing their property when we are done going
14 through it.

15 Q. Would this be, like, in cell inspection or
16 inspections of property when they came into the
17 institution?

18 A. When they came into the institution. So it's
19 like their belongings in a duffel bag, basically.

20 Q. Why did you leave that job?

21 A. I was living on my own. So it was hard to,
22 like, maintain living on my own.

23 Bills got hard.

24 Q. Had you ever sustained an injury while
25 working at Ely State Prison?

1 A. I did, like, get a nick on my finger from,
2 like, property, like, from a cart that they made me go,
3 like, get a shot for.

4 That's it, though.

5 Q. Other than getting a shot, did you seek out
6 any additional medical care?

7 A. No.

8 Q. And did they give you the shot right at the
9 institution?

10 A. No. I had to go to their hospital. Their
11 clinic area.

12 Q. And do you remember the name of that
13 hospital?

14 A. I don't. But it was in Ely.

15 I think there was, like, only one in there,
16 but --

17 Q. Other than going there for the shot, had you
18 ever gone to that hospital for any other treatment?

19 A. No.

20 Q. All right.

21 Now, you said you worked for Amazon on two
22 different occasions; correct?

23 A. Yes.

24 Q. Okay.

25 And what were your job titles at both of

1 those occasions?

2 A. Picker and packer.

3 Q. Now, on one occasion you were there for a
4 month and another occasion you were there for a longer
5 period of time. Is that correct?

6 A. Yes.

7 Q. And how long was the longer duration of time?
8 Was it about a year, or less?

9 A. A year and, like, a little bit more.

10 Q. All right.

11 Now, that one-month period, were you a
12 picker, packer, or both?

13 A. During the one-month period I was a packer.

14 Q. I just keep thinking Peter packed a thing of
15 pickles.

16 A. Yeah. Peter Piper picked a peck of pickled
17 peppers.

18 Q. That's it. That's the one.

19 Okay. What are the duties of a packer at
20 Amazon during the time you worked there?

21 A. So we had, like, a tote full of items. And
22 then, like, we will take another tote.

23 I can't remember exactly, but I know we just
24 packed items into boxes and then send them off down the
25 conveyor belt.

1 Q. Are these items on a table? Are they on a
2 cart? Are you holding them? Where are they?

3 A. They are in a tote and the tote is, like, by
4 our station. So we just grab one.

5 Q. Got it.

6 And then the station, is it on a conveyor
7 belt? Is it a table? What is it like?

8 A. It's a table.

9 And then, like, further, like, forward, there
10 is a conveyor belt that you push the item through,
11 like, when you are done packing it, and then it goes
12 off.

13 Q. Okay.

14 And then my presumption -- please correct me
15 if I am wrong -- if you're working at the packing
16 department, does that mean you're just staying at your
17 station and the pickers bring everything that you need
18 to you?

19 A. I think it depends on the facility. I am
20 trying to remember the facility.

21 I remember the first facility, the one I
22 stayed in for a year, like, we would grab our own tote,
23 and we will take that tote to our station.

24 Oh, the one for a month, it was a wall. They
25 called it, like, a wall. And there is items in, like,

1 the cubby. And on our screen it would show what cubby
2 to go to, to pick out that item, and pack it.

3 Q. All right.

4 And then, what about picker? What are the
5 duties of a picker?

6 A. For picker?

7 So it was, like, a robot that came to us and
8 it had, like, the item. You would take out the item
9 and put it in a tote. And then send the robot away.

10 And the next robot comes, and just repeat and
11 repeat.

12 Q. Why did you stop your work there?

13 A. It was unfulfilling. It was very boring, I
14 would say.

15 Q. Did you ever sustain an injury while working
16 there?

17 A. No.

18 Q. And Pizza Hut, what was your job title there?

19 A. A delivery driver.

20 Q. What were your duties of a delivery driver at
21 Pizza Hut, when you were working there?

22 A. Deliver pizzas when they are made.

23 Q. Did you have any duties to make the actual
24 pizzas?

25 A. No.

1 Q. And would you have to gather, like, the soft
2 drinks, and the condiments, and everything together,
3 and take that, all yourself, for each delivery?

4 A. Yeah. We would have to, like, check the
5 ticket to get, like, the drinks and, like, a sauce, and
6 then take that with those, yeah.

7 Q. Did you ever sustain any injury while working
8 at Pizza Hut?

9 A. No.

10 Q. Why did you leave there?

11 A. Not enough money.

12 Q. And where was Pizza Hut located?

13 A. Victorville.

14 Q. And the Amazon warehouses that you worked,
15 where were they located?

16 A. The long term one was in Eastvale,
17 California, and then the short term was in North Las
18 Vegas.

19 Q. Prime Trucking, where are they located?

20 A. So there is -- there's two places. The one
21 in Utah, where I primarily got my training. And then
22 they had a location in Missouri.

23 Q. Did you work in the Missouri location, or
24 just the Utah one?

25 A. It's kind of difficult to say because, like,

1 we go to, like, multiple facilities, because it is over
2 the road. Like, I picked up my truck in Missouri, so.

3 Q. Got it.

4 And Ruan, where were you primarily working
5 out of?

6 A. In Cali.

7 Q. Do you remember the city?

8 A. Rialto.

9 Q. Have you ever worked for Uber, Lyft, any of
10 those companies?

11 A. No.

12 Q. Have you ever filed any other claim against
13 any company or individual for Workers' Compensation
14 benefits?

15 A. No.

16 Q. Have you ever been involved in a motor
17 vehicle accident?

18 A. Yes.

19 Q. How many?

20 A. Just one.

21 Q. When did that happen?

22 A. I don't remember the exact date.

23 Q. What was the year?

24 A. 2022.

25 Q. So it was this year?

1 A. Yes.

2 Q. Do you remember if it was in the spring,
3 summer, fall, or do you remember when it happened?
4 What season it happened?

5 A. The exact, like, for sure, no. But as I
6 guesstimate, I think it was February, I think.

7 I could be wrong.

8 Q. So you know it was at least towards the
9 beginning of the year. Is that fair?

10 A. Yes.

11 Q. And what were you driving?

12 A. A Hyundai Elantra.

13 Q. What year was it?

14 A. I don't really remember the year.

15 It was either 2018 or 2019. I'm sorry.

16 Q. That's okay.

17 And my apologies. I presumed you were
18 driving.

19 Were you driving, or were you a passenger?

20 A. Driving.

21 Q. Okay.

22 And where were you? Were you in the streets,
23 freeway, parking lot, garage?

24 A. Streets.

25 Q. Do you remember the street you were on?

1 A. No.

2 Q. Do you remember the city that you were in?

3 A. Victorville.

4 Q. Were you at a light? Were you in free-
5 flowing traffic? Stop-and-go traffic? What was going
6 on?

7 A. So there is, like, a stop sign right there.
8 And then, like traffic going one way and traffic going
9 another way. So there wasn't, like, an intersection if
10 that's -- like a light intersection, so.

11 Q. So were you approaching the stop sign where
12 the cars in the road going perpendicular to you did not
13 have a stop sign?

14 A. Yeah.

15 Q. So it was a two-way stop?

16 A. So, like -- so, like --

17 No. It's just there is only one stop sign.
18 The one that stops me.

19 And then it's going out.

20 Q. Okay. And then what happened?

21 A. I got hit.

22 Q. Well, hold on.

23 So were you at the stop? Were you going
24 through --

25 A. No. I was going through the stop. And the

1 car sped, and hit me.

2 Q. So, the car going perpendicular to you. So
3 you were going from the stop into a lane, or were you
4 going straight? Where were you going?

5 A. So, perpendicular, it's like a geometry term.
6 Is that like going --

7 Q. So if you are traveling this way --

8 A. Uh-huh.

9 Q. -- the road that is going this way is
10 perpendicular to you.

11 A. Oh, okay. Yeah.

12 Q. Okay.

13 So were you making a right-hand turn, a
14 left-hand turn, or were you going straight past the
15 stop?

16 A. Straight to the left.

17 Q. Okay. So you were making a left-hand --

18 A. So I am proceeding forward to make a left
19 turn.

20 Q. Got it.

21 And then you were struck by a vehicle on the
22 driver's side?

23 A. Yes. But not on the driver's side.

24 Like, on the driver's side but, like, it
25 didn't hit my driver door.

1 Q. Understood. Okay.

2 So you were kind of T-boned, then; right?

3 A. The headlights. That's where I got hit.

4 Q. Okay.

5 Do you know what the speed limit is of that
6 road that you were going through to make your left-hand
7 turn?

8 A. Forty-five, forty.

9 Q. Do you have any reason to think that the
10 vehicle that hit you was traveling slower than the
11 listed speed limit?

12 A. Slower, no.

13 Q. Okay. All right.

14 And were you wearing a seat belt at the time
15 of the accident?

16 A. Yes.

17 Q. And did the Hyundai Elantra come equipped
18 with air bags?

19 A. Yes.

20 Q. Did the air bags deploy?

21 A. No.

22 Q. Okay. After you got hit, what happened next?

23 A. The officers were right there --

24 Q. Hold on.

25 THE COURT REPORTER: You froze a little bit.

1 BY MR. KARBASSYOON:

2 Q. Yeah. You fell off on our side.

3 So I heard "the officers," and then you cut
4 out.

5 A. Oh, sorry.

6 The officers, they were already at the scene,
7 because they were close by. And they got our
8 statements.

9 Q. Did you file a claim with your insurance
10 company?

11 A. Yeah.

12 Q. And who was your insurance carrier at the
13 time?

14 A. Allstate.

15 Q. Does the vehicle -- was your vehicle drivable
16 after that?

17 A. No. They totaled it.

18 Q. Did you need to seek out medical care after
19 that accident?

20 A. I did. Like I went to go for, like, a
21 personal, to make sure.

22 Q. And where did you go?

23 A. I don't know the exact place. Like, the
24 name. But I know it was in Victorville.

25 Q. Was it an urgent care? Was it a hospital?

1 A. I can never distinguish the two.

2 Q. Was is it, like, a building with multiple
3 floors? Was it just a single-story building?

4 A. It looked like a single story. It looked
5 like a clinic, but I am not totally sure.

6 Q. Okay.

7 And were you able to be seen by a medical
8 professional at that clinic or hospital, in
9 Victorville?

10 A. Yes.

11 Q. And while you were there, did they inform you
12 that you needed to undergo any kind of X-rays, or
13 anything?

14 A. No.

15 Q. And did they give you any kind of diagnosis?

16 A. No. Really, just they said, take Aleve.
17 Like a painkiller.

18 Q. And did you have pain in any body parts at
19 time?

20 A. Yeah. With my shoulder.

21 Q. Which shoulder?

22 A. My left.

23 Q. What about your knees? Did you have pain in
24 your knees following that accident?

25 A. No, not because of the accident.

1 Q. Did you notice whether or not the pain in
2 your knees increased after that accident?

3 A. No.

4 Q. Okay.

5 And then after the accident did you have to
6 continue seeking out care for your shoulder, or any
7 other body parts?

8 A. No.

9 Q. Did you retain an attorney to represent you
10 for a lawsuit after that accident?

11 A. No.

12 Q. And do you know if the other driver filed
13 suit against you, or if they just handled it through
14 insurance?

15 A. I am not sure.

16 Q. And did your insurance company give you any
17 kind of check, or payout, for your car?

18 A. Yes.

19 Q. How much did you receive?

20 A. I am not sure but I know it was like a little
21 over two. Two thousand.

22 Q. Okay.

23 Now, other than the accident that may have
24 taken place around February of 2022, have you been
25 involved in any other motor vehicle accidents?

1 A. No.

2 Q. Have you ever had an accident as a
3 pedestrian, like a slip and fall, that would require
4 medical care?

5 A. No.

6 Q. Have you ever had any accidents at your home
7 that required medical treatment?

8 A. No.

9 Q. Do you have private health insurance?

10 A. Private health?

11 Q. Yes. Like Anthem, Blue Cross Blue Shield,
12 anything like that? Healthcare? Health insurance?

13 A. Right now?

14 Q. Yes.

15 A. No.

16 Q. Did you ever have private health insurance?

17 A. Yes.

18 Q. And do you remember who your carrier was?

19 A. I am trying to remember if it was Blue Cross
20 or Blue Shield. I don't know if they are the same
21 thing.

22 Q. When was the last time you had health
23 insurance?

24 A. Working for Ruan.

25 Q. And when you had the health insurance, did

1 you ever use it?

2 A. Does glasses count?

3 Q. Sure.

4 A. Oh, just one for glasses.

5 Q. You never went to, like, a clinic or well
6 visits --

7 A. No.

8 Q. -- or anything?

9 A. No.

10 Q. Is there a doctor that you would go to if you
11 are feeling unwell or sick, generally speaking?

12 A. Like a family doctor,

13 Q. Yeah.

14 A. I don't have a family doctor.

15 Q. So if you are feeling sick or unwell, what do
16 you do?

17 A. Sleep.

18 Like the pain and, like, how extreme it is,
19 then I would go to a doctor for it.

20 If it's just like a regular thing, then, you
21 can stay home and drink some tea.

22 Q. Right. So, I mean, you said if -- depending
23 on how it is, you may go to the doctor. If you were to
24 go to the doctor, where would you go?

25 A. If I had, I had to went to, like, Kaiser.

1 They used to be my provider.

2 Q. Other than Kaiser, is there any other place
3 you would go, in the past, for medical care or
4 treatment?

5 A. Saint Mary's.

6 Q. Do you remember what city it was located?

7 A. Apple Valley.

8 Q. Any other clinic or hospital you would go to
9 to seek medical care?

10 A. No.

11 Q. And had you ever gone to Kaiser or Saint
12 Mary's for treatment of any injuries to your knees?

13 A. No.

14 Q. Were you ever kept overnight at these
15 hospitals?

16 A. Saint Mary's.

17 Q. And why were you kept overnight?

18 A. An allergy reaction to something. I don't
19 know what it was.

20 Q. When you say an allergic reaction, was it
21 like a respiratory thing where it was difficult to
22 breathe, or did you, like, swell up in certain joints?

23 A. It was, like, hives.

24 Q. Got it.

25 A. I guess -- I think Kaiser saw me.

1 It's like bumps, kind of.

2 Q. Yeah. No, I got it.

3 Any other overnight stays at hospitals for
4 any reason?

5 A. No.

6 Q. Have you ever broken a bone?

7 A. No.

8 Q. All right.

9 Other than Naproxen, is there any other
10 medication you take to aid you in coping with pain?

11 A. Yes. The name is Mecodin.

12 I have to go look.

13 Q. Can you -- what's your best recollection of
14 what the name is?

15 A. Mecodin. That's, like, as far as I could get
16 it.

17 Q. And who prescribed that to you?

18 A. Dr. Yuri Furman.

19 Q. Hold on one second.

20 And Yuri is Y-U-R-I, I believe. And Furman
21 is F-U-R-M-A-N.

22 Does that sound about right, ma'am?

23 A. I think.

24 MS. FOLEY: That's good, yes.

25 ///

1 BY MR. KARBASSYOON:

2 Q. Now, when you take that medication, does it
3 have any impact on your ability to drive a vehicle or
4 operate heavy machinery?

5 A. Can you rephrase that?

6 Q. Of course.

7 Does it make you drowsy or sleepy, at all?

8 A. No.

9 Q. And how often do you take that?

10 A. It says "as needed."

11 Q. So, then, in a given week, how often would
12 you take it?

13 A. The Mecodin, I can't pronounce?

14 Q. Yeah.

15 A. Probably, a couple of times.

16 Q. Is there any other medication that you have
17 been prescribed other than this Mecodin and the
18 Naproxen?

19 A. Yeah. The other one -- I really can't
20 pronounce that one.

21 It's starts with an E. And it's like a
22 one-time thing. I can't remember the name.

23 Q. Was that also prescribed to you by
24 Dr. Furman?

25 A. Yes.

1 Q. And what does that one do?

2 A. It's -- I am probably not sure.

3 I know it's supposed to be paired up with --

4 It came along with my Naproxen.

5 Q. Is it to, like, reduce inflammation? Is it
6 to reduce pain? What does it do?

7 A. Inflammation, sounds right. As far as, like,
8 the paper goes.

9 Q. Okay.

10 And does it make you drowsy or sleeping, at
11 all?

12 A. No.

13 Q. Any other medications other than this
14 Meconin, medication with E, and Naproxen?

15 A. No, that's it.

16 Q. Okay.

17 Have you applied for benefits through the
18 state EDD office?

19 A. I'm sorry. You cut off.

20 Q. Yeah. Have you applied for benefits through
21 EDD?

22 A. Yes.

23 Q. And do you know if they made a decision on
24 whether or not you are entitled to those benefits?

25 A. It's -- like, that's understanding thing at

1 this point. I am believing it said deny it based on
2 the fact that the mail. I guess the in box mail at
3 EDD.

4 Like, that's like the word I was able to make
5 out because of all of the technical terms.

6 Q. Got it.

7 So have you received a check from EDD, at
8 all, since your injury on November 9th?

9 A. No.

10 Q. Okay.

11 Have you applied for unemployment benefits?

12 A. That's Workers Compensation benefits?

13 Q. No, no, no. Separate.

14 A. No, no, no, no.

15 Q. Are you currently receiving any checks from
16 Run?

17 A. Run?

18 Can you rephrase that? That's like Run
19 itself or, like, Work mens?

20 Is that the same thing, or no?

21 Q. No. It's different.

22 So. Like, paychecks, or anything?

23 A. Oh, no.

24 Q. Okay. And then --

25 MS. FOLEY: Objection. I am not sure if my

1 client understands the question. But to my knowledge,
2 she is receiving PVDA advances, at this point.

3 MR. KARBASSYOON: Got it.

4 BY MR. KARBASSYOON:

5 Q. And just to jump off of what your attorney
6 was just saying right now.

7 Before PD As, do you recall receiving
8 something called temporary total disability benefits?

9 A. Yes.

10 Q. Okay.

11 And, then, are you still getting those, or
12 did those stop?

13 A. Temporary total? Those are continuing right
14 now.

15 Q. Okay.

16 Do you recall if you are receiving anything
17 called permanent disability advances?

18 A. No.

19 Q. And those benefits that you're getting right
20 now, do you know how much they are for?

21 A. 580.

22 Q. Okay.

23 MS. FOLEY: Counsel, I apologize that I am
24 interrupting, but my client was receiving TD. Then she
25 received notice of termination of TD because of the

1 termination of the doctor of her P and S status. And
2 then she started getting PVDA advances.

3 That's why the amount she is getting right
4 now is smaller than she received before.

5 MR. KARBASSYOON: Oh, yeah.

6 And I appreciate it. No worries, counsel.

7 MS. FOLEY: And she received both notices.

8 It is my understanding that she might not
9 understand the whole meaning of legal terms.

10 MR. KARBASSYOON: No. I get it.

11 And the 580 kind of clued me in to the PDAs.

12 BY MR. KARBASSYOON:

13 Q. So -- just so you know, ma'am, we are just
14 trying to clarify the benefits that you've received.
15 So if you don't understand, it is okay.

16 You know, I didn't know these terms of art
17 before I started doing this stuff, myself.

18 So, currently, you're getting 580 dollars
19 every two weeks.

20 Is that about right?

21 A. Yes.

22 Q. At some point in time before today, were you
23 receiving an amount greater than 580 dollars every two
24 weeks?

25 A. Before?

1 Q. Yeah.

2 A. Yes.

3 Q. Do you recall what that amount was?

4 A. Eighteen hundred. Give or take, like, a few
5 dollars.

6 Q. And the switch from eighteen hundred to 580
7 dollars, that happened roughly around May of 2022?

8 A. When I stopped seeing Dr. Elias.

9 Q. Yeah.

10 A. Yeah. When I stopped seeing Dr. Elias.

11 Q. Got it.

12 Okay. Sorry. I thought that was a question
13 you were asking me.

14 A. Sorry.

15 Q. That's all right.

16 Other than the permanent disability advances
17 of 580 dollars every two weeks, do you have any other
18 source of income at this time?

19 A. No.

20 Q. Hold on one second.

21 All right. Now, we had gone into your injury
22 on November 9th, 2021, earlier, during this proceeding.

23 Do you recall discussing that with me?

24 A. Can you repeat that?

25 Q. Of course.

1 We previously talked about your injury on
2 November 9th, 2021, and your injury to your left knee.

3 Do you remember discussing that with me?

4 A. Yes.

5 Q. Okay.

6 But at some point in time did your right knee
7 start to hurt?

8 A. When I got my left? On the same day?

9 Q. Yeah. I mean, you told me at the beginning
10 of the deposition your right knee has been hurting in
11 the last 30 days; right?

12 A. Yeah. Last 30 days.

13 Q. When did that right knee pain start?

14 A. Sometime the last 30 days.

15 Q. Oh, this is a very recent occurrence, the
16 right knee pain?

17 A. Yeah.

18 Q. Okay. Got it.

19 Now, I know you are not a doctor or a medical
20 professional. All I am asking for is your opinions and
21 your understanding as to what's going on.

22 A. Okay.

23 Q. In your opinion, and to the extent that you
24 know, if you know at all, what has led to you having
25 pain in your right knee?

1 A. I have been depending on it more since my
2 injury on my left knee. So, like, leaning on it and
3 just using it for, like, that extra weight.

4 Because I don't put as much weight on my left
5 knee anymore than I put on my right side. So I thought
6 it was more fatigued.

7 Q. And then when we were discussing this before,
8 you had indicated that you feel pain in your right leg
9 if you were to go on a walk for more than three hours.

10 Does that sound about right?

11 A. If I were to --

12 Can you say that again?

13 Q. Of course.

14 When we were discussing your right knee pain
15 earlier, you noted that it was present if you generally
16 go on walks in excess of three hours.

17 Does that sound about right?

18 A. Yeah. Yeah.

19 Q. Okay.

20 And then when you go on these walks for more
21 than three hours, you said you were going shopping.

22 Is there any other activity you engage in
23 that leads to you having pain in your right knee?

24 A. Only if it is like a physical activity.

25 But, like, walking.

1 Q. Okay.

2 Is there any other physical activity you
3 engage in, other than walking?

4 A. Yes. I do have an exercise bike to build up
5 my strength.

6 Q. Is it a stationary bike, or is it like a road
7 bike?

8 A. Stationary.

9 Q. And, then, do you, like, just do your own
10 thing, or do you go on, like, Peloton's app and do one
11 of their classes?

12 A. It's my own thing.

13 Q. How long do you ride the stationary bike?

14 A. For about 20 minutes.

15 Q. And how many days a week?

16 A. Three to four.

17 Q. Any other physical activity you engage in
18 that results in you having knee pain in your right
19 knee?

20 A. No.

21 Q. When you were out shopping for these three
22 hour periods of time, where do you go?

23 A. Like, Target or like, Walmart.

24 Q. So is it, like, for groceries or just like --

25 A. Groceries.

1 Q. And how many days a week do you go shopping
2 for over three hours at a time?

3 A. It depends, like, if I want something
4 specific to eat.

5 Q. So if you could estimate, ballpark it, in
6 seven days, how often do you go out to those shopping
7 centers, or whatever, for three hours at a time?

8 A. It varies. Like, three to four.

9 Q. Three to four times a week?

10 A. Yeah, about.

11 Q. And generally, do you go in the morning, the
12 evening, afternoon, when?

13 A. I'd say afternoon.

14 Q. Around what time?

15 A. It varies.

16 Q. If you could estimate, what would you say?

17 A. Maybe after, like, 3:00.

18 Q. Do you go out by yourself, or with friends?

19 A. I go by myself. Maybe, sometimes, with one
20 of my parents.

21 Q. When you are walking, do you require physical
22 assistance to get around? Like a cane or walker, or
23 anything like that?

24 A. I use a cart.

25 Q. I mean, generally speaking, when you are

1 walking outside, before you get to a shopping cart, are
2 you able to walk without any assistance?

3 A. Yes.

4 Q. And then when you walk --

5 Once again, I know you are not a medical
6 doctor. So all I am asking for is your experience and
7 your opinion.

8 Do you walk, like, normally, or do you walk
9 like, with a tilt, or limp, or anything?

10 A. Yeah, I mostly, like, lean to my right side
11 for, like, weight distribution.

12 Q. So have you observed a limp when you walk, or
13 no?

14 A. Yeah.

15 I don't know if it is like a limp. More like
16 a weird penguin. I don't know.

17 Because I try not to limp because it looks
18 awkward and it's like a confidence thing.

19 Q. No. I understand.

20 If you are in a seated position and you want
21 to stand up, do you require, like grabbing -- do you
22 have to, like, grab onto something to get you up, or
23 can you stand up on your own?

24 A. I push up.

25 Q. And have you done that before November of

1 2021?

2 A. Like push up, like, with my arms to get up?

3 Q. Yes.

4 A. Yeah.

5 Q. Okay.

6 Since your injury in November of 2021, to the
7 extent that you can recall, has your weight stayed the
8 same, gone up, or gone down?

9 A. It's gone up.

10 Q. How much?

11 A. I would say, about 20 pounds.

12 Q. Can you estimate what you weigh, presently?

13 A. Two --

14 As, like a guesstimate?

15 Q. Yes, ma'am.

16 A. Like 220.

17 MR. KARBASSYOON: All right.

18 Let's go off the record for just one second.

19 (Discussion off the record.)

20 BY MR. KARBASSYOON:

21 Q. Now, just to recap everything, on November
22 9th, you had pain in your left knee after the pallet
23 incident; correct?

24 A. Yes.

25 Q. And then the right knee pain didn't start

1 until about a month ago. Is that right?

2 A. About, yes.

3 Q. Okay.

4 Other than the pain in your right knee and
5 your left knee, have you had pain in any other body
6 parts since November of 2021?

7 A. Besides --

8 I'm sorry. My phone's ringing.

9 Besides, like the car accident for my
10 shoulder? Like -- but that was --

11 But other than that, no.

12 Q. Okay.

13 And, yes, I did mean besides that, as well.
14 Thank you for clarifying that.

15 Did you inform any of the doctors that you
16 were treating with on the Workers Comp side,
17 Dr. Furman, Dr. Elias, anyone that you were going to
18 treat with that you were involved in a motor vehicle
19 accident in, like, February of 2022?

20 A. The physical therapist.

21 Q. Okay.

22 And why didn't you tell the other doctors?

23 A. Either I wasn't scheduled to see them,
24 because they had certain days where I had to see them.

25 So I figured, tell the person that I am

1 seeing, or medical.

2 Q. Do you remember the physical therapist you
3 told?

4 A. By face, yes. By name, no.

5 Q. Does Belko sound familiar? B-E-L-K-O?

6 A. I am familiar with that on the paper.

7 Q. Other than taking the Naproxen, the two other
8 medications, is there anything else that you do to aid
9 you in reducing the pain in your knees?

10 A. I keep it elevated. It's better for me to,
11 like, not have it bent. It feels better.

12 Q. As far as your range of motion, like your
13 ability to move your leg up and down and around, do you
14 have similar range of motion in both of your legs?

15 A. Like, moving it, like a walking motion?

16 Q. Like, if you are seated, are you able to bend
17 your knees at that 90-degree angle?

18 A. Yes.

19 Q. And then are you able to straighten your legs
20 out, all the way, if you are seated in a chair?

21 A. Yes.

22 Q. And if you're standing --

23 You know that stretch where you grab your
24 ankle and pull your heel to your rear end?

25 A. No.

1 Q. Okay. Are you able to --

2 A. You stretch. You grab your ankle to your
3 rear?

4 Q. Are you able to pull --

5 A. Like, backwards like a --

6 Q. No, no.

7 Are you able to pull your leg back towards
8 your rear end, and bend at the knee?

9 A. That sounds painful. I've never -- I don't
10 think I have tried that.

11 Q. Okay. Never mind. That's all right.

12 As far as sleep is concerned, what time do
13 you go to bed at night?

14 A. It varies. Probably, like, 10:00, 11:00.

15 Really, it could be like 10:00, 11:00, 12:00.

16 Q. At night?

17 A. Yes.

18 Q. And what time do you wake up?

19 A. 11:00 a.m.-ish. Like, Moroccan, I would say.

20 Q. And do you wake up throughout the night?

21 A. Yes.

22 Q. How many times would you have to estimate?

23 A. Once or twice.

24 Q. Is that just to use the restroom?

25 A. Probably like the first time, or if it's hot.

1 If it's, like, cold then cold weather affects
2 it.

3 Q. When you say "cold weather affects it," do
4 you mean your knee?

5 A. Oh, yeah.

6 Q. Okay.

7 Okay. And are you able to get in and out of
8 bed on your own, without assistance?

9 A. Yes.

10 Q. Do you take any medications to aid you in
11 sleeping?

12 A. No.

13 Q. Are you presently receiving any therapy or
14 treatment from any mental health professionals?

15 A. No.

16 Q. The medications that you get filled, the
17 prescriptions, where do you get your scrips filled?

18 A. They send them to me through mail.

19 Q. Is there a pharmacy that you would go to, to
20 get medications filled?

21 A. If I had to, like, I guess a preference would
22 be, like, at a CVS, or a Walgreens.

23 Q. Is there one that you go to near your home
24 if you had to get a prescription filled?

25 A. Are you asking have I had to go there to get

1 a prescription filled?

2 Q. Yes.

3 A. No.

4 Q. Okay. Do you have any pets?

5 A. No.

6 Q. Other than the walking and the stationary
7 bike, is there anything else that you do for exercise?

8 A. Besides, like moving my arms up and down, no.

9 Q. So, no swimming?

10 A. No. I can't swim.

11 Q. Okay. What about, like, jogging or --

12 A. I'm sorry. The phone cut you off.

13 Q. What about jogging or lifting weights?

14 A. No.

15 Q. What about, like, karate, boxing, mixed
16 martial arts?

17 A. No. I wish. But, no.

18 Q. So no cage fighting on the weekends?

19 A. No.

20 Q. Did you do chores around the house?

21 A. Take out the trash sometimes, and wash
22 dishes.

23 Q. Anything else?

24 A. Clean the toilet.

25 Q. Do any of these activities cause you to have

1 pain in your knees?

2 A. When I have to, like, bend down to clean the
3 toilet. Like bending beside the bowl, like that could
4 be difficult, and, like, leverage, trying to get back
5 up.

6 Q. Okay. And are you able to dress yourself?

7 A. Yes.

8 Q. And do you have any issues like bathing or
9 hygiene-wise, because of your knees?

10 A. No.

11 Q. Are you able to drive on your own?

12 A. Yes.

13 Q. Is there a limit as to how long you can drive
14 before you have pain, or if you have pain in your
15 knees?

16 A. Yes. It varies, though. Because, like when
17 you are driving, staying at that 90-degree angle, like,
18 like I said, it's better if I keep my leg straight,
19 rather than bent. After a while it will start acting
20 up.

21 Q. Got it.

22 And is there anything that you cannot do now
23 that you used to be able to do before your injury?

24 A. Climb stairs. Squat. Going out. Like just,
25 like, hanging out. Like, if I want to, like, have the

1 option of going to, like, a theme park or something,
2 but like a journey. That's like a full day.

3 Anything that would require, like, a --
4 staying on my feet for long periods of time, that would
5 be pretty difficult.

6 Q. Had you ever sustained any injuries playing
7 sports?

8 A. No.

9 Q. And had you ever sustained an injury as a
10 result of a physical altercation, like a fight?

11 A. No.

12 Q. Have you ever had a gym membership?

13 A. Yes.

14 Q. And what gym did you have a membership to?

15 A. In Shape.

16 Q. Is it an active membership that you have, or
17 is this one that has lapsed?

18 A. It has lapsed. It's old.

19 Q. When was the last time you had an active
20 membership at In Shape?

21 A. Years ago. I can't tell you how many years
22 ago.

23 Q. Okay.

24 And have you ever ridden, like, a quad, or a
25 motorcycle?

1 A. No.

2 Q. Had you ever had an accident or an injury off
3 of a bicycle?

4 A. No.

5 MR. KARBASSYOON: Okay.

6 Counsel, do you have any questions for the
7 applicant at this time?

8 MS. FOLEY: I just want to clarify the issue
9 of gaining weight.

10

11

EXAMINATION

12 BY MS. FOLEY:

13 Q. Aysha, can you please tell me when you
14 started gaining weight according to your understanding?

15 A. Like right, I guess, when I stopped working,
16 because my job is very active.

17 So four days a week working, that's a lot of
18 activity that I am not getting at home. Especially,
19 not 10 plus hours of it.

20 Q. Was this related to minimize the mobility
21 because of the injury?

22 A. Can you repeat that? I didn't understand.

23 Q. Do you believe that your increase in weight
24 was related to your limited mobility?

25 A. Yes.

1 Q. How did that affect your life at this moment?

2 A. Socially, going out, you know, it would be
3 nice, you know, going out and being social. Doing the
4 things that I want, like, even if it is like at a given
5 a moment. Like, I have to, like, think about my health
6 and, like, how it is going to affect my knee.

7 Like, I don't want to be in pain and bring
8 the whole group down, if it comes down to that.

9 So it's like primarily staying at home and --
10 it's, like, depressing just staying at home all the
11 time.

12 Q. Are you saying that you are feeling sad and
13 depressed because of that?

14 A. Yes.

15 Q. When you are saying it prevents you from
16 communication with your friends, what do you mean?

17 A. Like going out and actually spending time
18 with them, like, it's limited.

19 Yes, I can go and sit at a movie theater, but
20 if I am going to do an activity, like play basketball,
21 or go out to a theme park, or any of that, it is going
22 to be difficult for me.

23 And I am limited to the activities I want to
24 do, and no one wants to just, like, cater to, like, one
25 person, and do that one activity.

1 Q. When you are saying difficult, do you mean
2 physically, or emotionally?

3 A. Physically.

4 Emotionally, that I can't just hang out all
5 the time. Like, emotions is hard to, like, discuss,
6 but, yeah, I'd say both.

7 Q. Physically, do you mean it is harder for you
8 to walk?

9 A. Yes.

10 MS. FOLEY: Okay. I have no further
11 questions.

12 MR. KARBASSYOON: All right.

13 Let's go off the record for one second. I
14 want to look at my notes.

15 (Discussion off the record).

16

17

EXAMINATION

18 BY MR. KARBASSYOON:

19 Q. Were you ever given a knee brace to wear?

20 A. Yes.

21 Q. And was this a brace that had, like, metal
22 hinges on it?

23 A. No. Typically --

24 It wasn't given to me. I had to go purchase
25 one, and then they compensate me for it.

1 Q. And how long did you wear this knee brace
2 for?

3 A. A couple of months.

4 Q. Did it help?

5 A. No. It felt like it was cutting off my
6 circulation. I don't know if I was putting it on
7 right, but I wore it, because they said, wear it.

8 Q. Okay.

9 And when did you stop wearing it, if you can
10 remember?

11 A. Probably after those couple of months when I
12 figure it wasn't really helping.

13 Like I was getting, like, better relief from
14 elevating it than just wearing a knee brace all the
15 time.

16 Q. Okay.

17 Now, in your opinion, has the pain in your
18 knee increased, decreased, or stayed the same since
19 your injury on November 9th, 2021?

20 And I mean your left knee?

21 A. It decreased.

22 Q. Okay.

23 And since the right knee pain started about a
24 month ago, has that pain stayed the same, increased, or
25 decreased about -- since the month?

1 A. I'd say stayed the same.

2 MR. KARBASSYOON: Okay. Counsel, do you have
3 any final questions for the applicant before we
4 conclude?

5 MS. FOLEY: No. No more questions.

6 MR. KARBASSYOON: Okay.

7 At this point in time defendants are
8 concluded with the applicant's deposition but do
9 reserve our rights for a further volume proceeding
10 should the application be amended to include any
11 additional dates of injury or body parts not previously
12 discussed.

13 The original transcript to be sent to
14 applicant's attorney's office, and that within 45 days
15 of their receipt, the applicant attorney to inform the
16 parties of any and all changes made to the deposition
17 transcript.

18 Additionally, we shall also stipulate to
19 relieve the court reporter of her duties insofar as
20 retaining the transcript.

21 MS. FOLEY: So stipulated.

22 (Whereupon the deposition concluded
23 at 12:11 p.m.)

24 ---o0o---

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DEPOSITION ERRATA SHEET

Our Assignment No. 835475
Case Caption: Aysha Chowdhuary
vs. Ruan Transport Corporation; Liberty Mutual Ins.,
Co. c/o Helmsman Management Services, Inc.

DECLARATION UNDER PENALTY OF PERJURY

I declare under penalty of perjury that I
have read the entire transcript of my deposition taken
in the captioned matter or the same has been read to me
and the same is a true and accurate, save and except
for changes and/or corrections, if any, as indicated by
me on the DEPOSITION ERRATA SHEET hereof, with the
understanding that I offered these changes as if still
under oath.

Signed on the _____ day of _____, 2022.

AYSHA CHOWDHUARY

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REPORTER'S CERTIFICATION

I, GRACE SCHMIDT, a Certified Shorthand Reporter in and for the State of California, do hereby certify:

That the foregoing witness was by me duly sworn; that the deposition was then taken before me at the time and place set forth herein, that the testimony and proceedings were reported stenographically by me and later transcribed into typewriting under my direction; that the foregoing is a true record of the testimony and proceedings taken at the time.

IN WITNESS WHEREOF, I have subscribed my name this 4th day of August, 2022.



Grace Schmidt
California CSR No. 8149, RMR

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