

STATE OF CALIFORNIA

WORKERS' COMPENSATION APPEALS BOARD

REPORTER CERTIFIED
TRANSCRIPT

JULIEN OLIVIER,

Applicant,

Case No. ADJ14026805

-vs-

COUNTY OF LOS ANGELES,

Defendant.

VIDEOCONFERENCE DEPOSITION OF

JULIEN OLIVIER

FRIDAY, AUGUST 20, 2021

SANTA CLARITA, CALIFORNIA

REPORTED BY:
KELLY CHAPMAN
CSR NO. 13727
FILE NO. 41547



1 The Videoconference Deposition (Via Zoom) of
2 JULIEN OLIVIER, taken on behalf of Defendant, at
3 Santa Clarita, California, commencing at 2:10 p.m., on
4 Friday, August 20, 2021, before Kelly Chapman,
5 California Certified Shorthand Reporter No. 13727.
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7

8 A P P E A R A N C E S
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11 FOR THE APPLICANT:
12

13 STRAUSSNER SHERMAN

14 BY: ELLA CRESTANI, ATTORNEY AT LAW

15 14555 Sylvan Street

16 Van Nuys, California 91411

17 (818) 788-1700

18 ecrestani@iodlawyers.com
19
20
21
22
23
24
25

1 APPEARANCES CONTINUED:

2
3 FOR THE DEFENDANT:

4
5 LAW OFFICES OF GRAY & PROUTY

6 BY: CHRISTOPHER COOLEY, ATTORNEY AT LAW

7 530 Camino Mercado

8 Suite 538

9 Arroyo Grande, California 93420

10 (805) 786-4050

11 ccooley@grayandprouty.com

I N D E X

WITNESS: JULIEN OLIVIER

EXAMINATION

PAGE

BY MR. COOLEY

5

INSTRUCTION NOT TO ANSWER

(NONE)

INFORMATION REQUESTED

(NONE)

EXHIBITS

(NONE OFFERED)

FRIDAY, AUGUST 20, 2021; SANTA CLARITA, CALIFORNIA

2:10 P.M. - 3:02 P.M.

- - -

JULIEN OLIVIER,
having first declared under penalty of perjury to tell
the truth, was examined and testified as follows:

EXAMINATION

BY MR. COOLEY:

Q. Can I get your name for the record, please.

A. Julien Olivier.

Q. And, Mr. Olivier, have you ever been known by
a different name?

A. No.

Q. Okay. First off, my name is Christopher
Cooley. I'm an attorney for the County of Los Angeles
today.

Have you ever had your deposition taken
before?

A. No.

Q. Okay. I know you've had a chance to meet with
your attorney before we got started today, but I'm
going to go over some things; they're called
admonitions. And the purpose is to have us go along

1 with a mutual understanding and not waste time.

2 First off, although we're here informally on
3 Zoom, since you've been placed under oath, your
4 testimony has the same effect as if you were to testify
5 in court. To be clear, if later on it were found that
6 you misrepresented something to me, you could have
7 problems with your workers' compensation case or you
8 could be prosecuted under the fraud or perjury laws in
9 the state.

10 I say this to emphasize that you need to tell
11 the truth today, and I need you to acknowledge that you
12 understand you need to tell the truth today.

13 A. I understand and I acknowledge.

14 Q. Thank you, sir.

15 While I am entitled to your best testimony and
16 your best recollection, and I might even ask you for an
17 estimate, I am not entitled to any answer that would be
18 a guess. And just so that we're clear on the
19 difference between a guess and an estimate, if, for
20 example, I were to ask you the color of my car out in
21 the parking lot here in Arroyo Grande, any answer that
22 you gave me besides "I don't know" would be a guess
23 based upon the fact that you've never seen that car.

24 On the other hand, if I were to ask you the
25 size of the room that you're sitting in right now, even

1 if you didn't know exactly how big it was, you could
2 give me an estimate based upon having seen it.

3 Do you understand the difference?

4 A. Yes.

5 Q. Okay. Good. You're already doing a good job
6 waiting until my question is finished before you answer
7 it. And I want to encourage you to keep doing that for
8 a couple of reasons. First off, since the court
9 reporter is taking down what we say, it will make it
10 more difficult for her if we interrupt each other.

11 Second, I want you to have a full
12 understanding of my question, and the end of my
13 question might change what your answer might be. So
14 make sure you hear the whole question before you give
15 me an answer.

16 Third, your attorney might have an objection
17 to one of my questions and she might even want to
18 instruct you not to answer it, and I want to give her
19 that opportunity before you give me an answer.

20 Do you understand all that?

21 A. Yes.

22 Q. Okay. Good. Now, since we're taking down
23 what we say, it's important that my questions and your
24 answers be in words. When people get conversational,
25 sometimes they break down to responses like "Uh-huh" or

1 "Huh-uh," and those don't translate very well and we
2 might be confused later by what you meant. Also,
3 people sometimes just nod or shake their head, and she
4 can't take that down. So yeses and noes are preferred.

5 This is not an endurance contest. If you feel
6 the need to take a break for some reason, please let us
7 know, we'll be happy to accommodate you. Also, if you
8 become uncomfortable where you're sitting, I don't have
9 a problem if you change positions so long as the court
10 reporter can hear you.

11 When we're done here today, the court reporter
12 is going to type up a transcript. And that's like a
13 book, and it has everything that we said in it. And
14 you're going to be given an opportunity to review that
15 transcript and sign it under penalty of perjury.

16 Any changes that you -- you also have the
17 opportunity to make changes to the transcript to make
18 it more accurate. I want to caution you that any
19 changes that you do make could be subject to comment by
20 me or another attorney at further proceedings.

21 Frankly, those comments might be embarrassing to you or
22 harmful to your case. I say this to emphasize that I
23 need your best recollection and testimony here now
24 today and not how you might think about this later.

25 Do you understand everything I've said so far?

1 A. Yes.

2 Q. Okay. Do you have any questions for me before
3 we get started?

4 A. No, sir.

5 Q. All right. Have you had any drugs, alcohol,
6 or medications today?

7 A. No.

8 Q. As you sit here, do you feel like you're okay
9 to go ahead and recall and testify things for me, or is
10 there anything that would prevent you from doing that?

11 A. I'm okay.

12 Q. All right. Let's have your date of birth.

13 A. June 27th, 1967.

14 Q. And where were you born?

15 A. Manchester, New Hampshire.

16 Q. And when did you come to California?

17 A. When I was probably -- I want to say 19 --
18 around 1971. I was about three or four.

19 Q. And have you lived in the California area
20 since then?

21 A. No.

22 Q. Okay. Where else have you lived besides
23 California?

24 A. I lived in Arizona -- yeah, Arizona; and then
25 I moved back to New Hampshire; and then I came back to

1 California and I've been here since.

2 Q. What period of time were you in Arizona?

3 A. When I was -- do you want years or do you just
4 want like how old I was? I'm just trying to think
5 here.

6 Q. Whichever way is easiest for you is fine.

7 A. When I was like fourth, fifth and sixth
8 grade -- fifth, sixth, seventh grade, I was in Arizona
9 for a few years.

10 Q. Okay. During what period of time were you in
11 New Hampshire?

12 A. I was in New Hampshire when I entered ninth
13 grade, and we were only there about three months, then
14 we moved back to California.

15 Q. So you were still in ninth grade when you came
16 back to California?

17 A. Correct.

18 MR. COOLEY: Let's go ahead and go off the
19 record for a second.

20 (A discussion was held off the record.)

21 MR. COOLEY: Back on the record.

22 BY MR. COOLEY:

23 Q. How long have you lived at that address that
24 you just gave me?

25 A. I moved here in 1995, so 27 years.

1 Q. And who do you live there with?

2 A. My wife and my two children.

3 Q. What is your wife's name?

4 A. Michelle Olivier.

5 Q. And does Michelle have a job or occupation?

6 A. No.

7 Q. Is Michelle disabled?

8 A. No.

9 Q. You've just been married the one time?

10 A. Yes.

11 Q. And you have just the two children?

12 A. Yes.

13 Q. And what are their names and ages?

14 A. My youngest is Ashley Olivier, and she's 23.

15 And my other daughter is Amanda Olivier, and she's 27.

16 Q. Are either one of your daughters disabled?

17 A. No.

18 Q. Anybody who is dependent upon you for their
19 food and shelter?

20 A. My younger daughter and my wife because they
21 don't work.

22 Q. And I probably should have said anybody
23 outside of the household.

24 A. No. No.

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

1 A. No.

2 Q. Ever served in the military?

3 A. Yes.

4 Q. What branch?

5 A. Marine Corps.

6 Q. When did you join the Marines?

7 A. 1986.

8 Q. Enlisted?

9 A. Yeah, enlisted. I was in the reserves.

10 Q. And how long were you in the Marine Corps
11 Reserves?

12 A. Six years.

13 Q. What rank did you attain?

14 A. E-5, Sergeant.

15 Q. You separated from the Marines active duty and
16 reserve status?

17 A. Yes.

18 Q. And do you have any sort of disability from
19 your time with the Marines?

20 A. No.

21 Q. Honorable discharge?

22 A. Yes.

23 Q. Member of a union?

24 A. PPOA, yes.

25 Q. Now, are you currently entitled to any

1 benefits from PPOA, like payments?

2 A. No.

3 Q. You attended high school?

4 A. Yes.

5 Q. Did you graduate?

6 A. Yes.

7 Q. And what was the name of the high school?

8 A. Thousand Oaks. Actually, I've attended three
9 high schools. The one I graduated from was Thousand
10 Oaks.

11 Q. Okay. And what year was that?

12 A. 1986.

13 Q. Any other formal education after that?

14 A. Some college.

15 Q. What colleges have you attended?

16 A. Moorpark College, and College of the Canyons.

17 Q. Do you have any degrees from that college
18 attendance?

19 A. No, I do not.

20 Q. And do you have any professional licenses or
21 certificates?

22 A. Professional -- within the job or outside of
23 the job? I don't understand the question exactly.

24 Q. Well, some people will have like a Realtor's
25 license and some people might have a paralegal license.

1 A. No.

2 Q. Are you currently employed with the County of
3 Los Angeles?

4 A. Yes.

5 Q. That's the Sheriff's Department?

6 A. Correct.

7 Q. And you're a lieutenant?

8 A. Yes.

9 Q. And what was -- when did you start with the
10 County?

11 A. November 7th of 1990.

12 Q. Are you currently working full-time?

13 A. Yes.

14 Q. And what is your current assignment?

15 A. I'm assigned to Custody Division, Pitchess
16 Detention Center, South Facility.

17 Q. And who is your supervisor?

18 A. My captain is Jacqueline Sanchez.

19 Q. How much do you earn at the County?

20 A. A month? An hour? What do you --

21 Q. Whatever is easiest for you.

22 A. A month, I want to say, 18,000. Around there.
23 I don't know the exact number off the top of my head,
24 but I know it's 18,000.

25 Q. Let's say during the past five years have you

1 had any income from any other sources besides the
2 County of Los Angeles?

3 A. Yes.

4 Q. What other income have you had?

5 A. Myself and a partner of mine used to teach a
6 force investigation course up and down the state of
7 California. And we charged the students that would
8 come to the course.

9 Q. Okay. Did you have a name for that business?

10 A. We didn't. No, we didn't have a business
11 license. We just did it like a 1099.

12 Q. Okay. So were you guys like some sort of
13 partnership, or you did it just kind of informally?

14 A. Yeah. I mean, we were instructors. We would
15 teach the class. We would advertise it. And then we
16 would divide the proceeds up following the -- teaching
17 the class.

18 Q. What period of time did you do this?

19 A. Give me a second here to think. From -- I
20 want to say from 2016 to 2020. Or maybe '15 to -- I'm
21 sorry, maybe '15 to '19. Sorry, '15 to '19.

22 Q. Do you have any sort of estimate about how
23 much income you might have had from 2019 from that?

24 A. Maybe 8- to \$10,000. Our prices went up over
25 the years, so.

1 Q. Who was the other person that you were doing
2 this with?

3 A. Ron Shaffer.

4 Q. Is he also with the County of Los Angeles?

5 A. Yes.

6 Q. And was there a reason you stopped in 2019?

7 A. Yes.

8 Q. What was the reason?

9 A. He promoted and he didn't have much time
10 anymore to teach, and then shortly after, COVID hit.

11 Q. Okay. Any other sources of income over the
12 last five years that we haven't discussed?

13 A. No.

14 Q. All right. Now, I have your application for
15 adjudication of claim for workers' compensation claim
16 on a cumulative trauma basis. Had you ever had any
17 other workers' comp claims with the County where you
18 lost time from work or had to have significant medical
19 treatment?

20 A. No.

21 Q. Before going to work for the County of
22 Los Angeles, had you ever had employment where you got
23 injured on the job?

24 A. No.

25 Q. Who is your current medical treatment provider

1 for your general health issues, like if you get a cold
2 or whatever?

3 A. Anthem Care Blue Cross, Stacy Medical Group.

4 Q. And where is Stacy Medical Group located?

5 A. There's one here in Santa Clarita. They're
6 all over the place, but the one I go to is in
7 Santa Clarita.

8 Q. Do you have a specific doctor that you're
9 assigned to under that?

10 A. You know, I do. And I do not know her name.
11 I've only went there once for a physical when I was 51.

12 Q. And where is the medical group located in
13 Santa Clarita?

14 A. The urgent care is -- I don't know the
15 address. It's off the intersection of Valencia
16 Boulevard and McBean Parkway.

17 Can I just back away from the screen to let my
18 dog out real quick, I'm sorry?

19 Q. That's fine.

20 MS. CRESTANI: Of course.

21 (A brief pause in proceedings.)

22 BY MR. COOLEY:

23 Q. All right. On this application for
24 adjudication of claim, I'm seeing that it's a
25 cumulative trauma claim. Do you know what a cumulative

1 trauma claim is?

2 A. Yes.

3 Q. Okay. We're talking about your left shoulder,
4 teeth grinding, tinnitus, hearing loss, your back, your
5 knees, your feet, and your right hand.

6 Are those the body parts that you feel have
7 been injured during your employment at the County?

8 A. Yes.

9 Q. Any other body parts that you feel you've
10 injured at the County that you haven't -- that I didn't
11 just go through?

12 A. My eyes. And my right shoulder.

13 Q. So both shoulders?

14 A. Yes.

15 Q. Any other body parts that you feel were
16 injured at the County that we didn't just discuss?

17 A. No.

18 Q. Okay. So let's go through this. When did you
19 first notice that you were having an issue with your
20 teeth?

21 A. 2006.

22 Q. And what sort of issue were you having with
23 your teeth in 2006?

24 A. Grinding.

25 Q. And when would that occur?

1 A. At night and sometimes during the day.

2 Q. And did you get any treatment for grinding
3 your teeth back then?

4 A. Yes.

5 Q. Who would that have been with?

6 A. A dentist by the name of Dr. Fealy.

7 Q. Can you spell that last name for me?

8 A. It's F-e-e-l-e -- no, F-e-a-l-y. I think
9 that's how you spell it. F-e-a-l-y.

10 Q. And where is Dr. Fealy located?

11 A. He's located in Valencia, California.

12 Q. And how long have you been seeing Dr. Fealy?

13 A. I want to say around 20 years.

14 Q. And besides Dr. Fealy, have you seen any other
15 dental professionals for your teeth?

16 A. Just when I had my wisdom teeth removed.

17 Q. And when was that?

18 A. I want to say when I was around 28 years old.

19 And one other doctor, when I had my -- no -- and then,
20 I'm sorry, just recently after I filed my workers' comp
21 claim I was sent to a doctor -- a dentist to see my
22 teeth regarding my work comp claim.

23 Q. Did your attorney send you to that doctor?

24 A. Yes, sir.

25 Q. Who is the doctor that removed your wisdom

1 teeth, if you remember?

2 A. I do not remember.

3 Q. Do you still grind your teeth presently?

4 A. Not like I used to, but every once in a while
5 I catch myself subconsciously still doing it. So the
6 answer is yes.

7 Q. Okay. Now, when did you first notice the
8 tinnitus?

9 A. The tinnitus?

10 Q. Yes.

11 A. Refresh my memory, what's tinnitus?

12 Q. Tinnitus is where you have ringing in your
13 ears.

14 A. I can't give you a date. I honestly don't
15 recall. And I have very little ringing in my ears. So
16 I really don't have -- I just have very little, but
17 it's not like it's constant. I really don't know when.
18 I couldn't tell you a specific time.

19 Q. Has it been a year or more than that?

20 A. It's been more than a year, yes.

21 Q. Has it been more than five years?

22 A. Yes.

23 Q. Have you ever gotten any sort of examination
24 or treatment for tinnitus?

25 A. No.

1 Q. And then hearing loss, do you have any idea of
2 when you first noticed that you were having hearing
3 loss?

4 A. Three to five years ago.

5 Q. And have you had any visits with any hearing
6 professionals?

7 A. Yes.

8 Q. When did you first go to some sort of doctor
9 for hearing?

10 A. A few months ago under the direction of my
11 attorney.

12 Q. Prior to that, had you ever had hearing tests?

13 A. If I remember correctly, when I came on the
14 department back in 1990.

15 Q. So when did you first notice that you were
16 having any sort of issue with your back?

17 A. A few years ago.

18 Q. What sort of issues are you having with your
19 back?

20 A. My sciatic nerve and my lower back pain.

21 Q. Have you ever gotten any medical treatment for
22 your low back?

23 A. Not treatment, no.

24 Q. Have you ever been examined in your low back?

25 A. Yes.

1 Q. Who has examined your low back?

2 A. Dr. Conwiser. He's an orthopedic.

3 Q. And when about was that that Dr. Conwiser
4 examined your back?

5 A. I'm sorry, you asked when?

6 Q. Yes, sir.

7 A. Around like five months ago.

8 Q. Have you seen any other medical treatment
9 professionals for your back?

10 A. No.

11 Q. What sort of problems are you having with your
12 right hand?

13 A. I'll get a sharp pain. It almost feels like
14 an electrical shock in my knuckles, on two of my
15 fingers.

16 Q. Which two?

17 A. My thumb and my pointer finger, yes.

18 Q. When you say the knuckles, are you talking
19 about where they connect to the hand or farther down
20 the fingers?

21 A. The first one that you touched, right there,
22 and then right here (indicating).

23 Q. So we're talking about the knuckle where
24 the -- where each -- where your thumb and first finger
25 separate from --

1 A. Correct.

2 Q. And how often do you have that pain?

3 A. A few times a week.

4 Q. And when the pain comes on, how long does it
5 last?

6 A. Just a few seconds.

7 Q. And do you notice anything that makes that
8 happen or makes it worse?

9 A. When I'm typing.

10 Q. Do you notice anything that makes it feel
11 better?

12 A. When I stop.

13 Q. And how long have you had some issues with
14 your right hand?

15 A. Probably, I'd say, in the last year.

16 Q. And what sort of things do you do at work that
17 you feel have contributed to your right hand issues?

18 A. Typing reports on a computer.

19 Q. How much time do you think you spend at work
20 typing?

21 A. It varies from day to day.

22 Q. So can you give me a range?

23 A. One to three hours.

24 Q. Have you ever had any medical treatment for
25 your right hand?

1 A. No.

2 Q. What sorts of issues are you having with your
3 feet?

4 A. I've been diagnosed with plantar fasciitis.

5 Q. And when did you have that diagnosis?

6 A. Back in 2001.

7 Q. And who was the doctor that diagnosed plantar
8 fasciitis?

9 A. I do not know.

10 Q. Was it your regular doctor? Was it some other
11 doctor?

12 A. Some other doctor.

13 Q. And where was that doctor located?

14 A. Canyon Country.

15 Q. What sort of doctor was it?

16 A. A podiatrist. Is that the doctor? Am I
17 saying the name right? I think that's a foot doctor.

18 Q. And for what reason was it you were going to
19 see the podiatrist?

20 A. I'm sorry, you were cutting out.

21 Q. For what reason was it that you were going to
22 see the podiatrist at that time?

23 A. I was having severe pain in the heels of my
24 feet.

25 Q. Is that both heels?

1 A. Yes, sir.

2 Q. And was the pain equal between both feet or
3 was one worse than the other?

4 A. No. It was equal.

5 Q. So after being diagnosed with plantar
6 fasciitis, did you get any treatment for that?

7 A. No.

8 Q. Did the podiatrist give you any sort of things
9 to do about the plantar fasciitis?

10 A. He told me to stop running for three weeks and
11 get some foot inserts for my shoes.

12 Q. Did you get the foot inserts?

13 A. Yes.

14 Q. Did that help?

15 A. No.

16 Q. Okay. After -- did the foot problems that you
17 were having continue from 2001 to the present?

18 A. Not continuously. What I mean by that, the
19 pain hasn't been continuous from then to now; but the
20 problem has been ongoing since then.

21 Q. Okay. So explain how the problem has been
22 ongoing for me. I need a little description of it.

23 A. It can be in one foot. It can be in the other
24 foot where I -- as an example, I'll get pain in my left
25 heel and I can have it for two months to up to a year,

1 and then one day it just goes away. And then it will
2 happen in the left foot, the same thing. It will come
3 and then it goes. It can be in both feet. Then there
4 will be no pain at all. And it's just been this roller
5 coaster for the last 20 years.

6 Q. Okay. Have you noticed anything that makes
7 your foot pain worse?

8 A. Well, sometimes just walking makes it worse.

9 Q. Anything else that you notice that makes it
10 worse?

11 A. No, because I don't know exactly what causes
12 it to make it worse. Beyond walking, I couldn't tell
13 you specifically what makes it worse.

14 Q. Okay. And have you noticed anything that
15 makes it feel better?

16 A. I wish I did.

17 Q. Have you ever taken medications for your foot
18 pain?

19 A. No.

20 Q. And besides the podiatrist at Canyon Country
21 back in 2001, have you gone to any other doctors for
22 treatment for your bilateral feet?

23 A. No.

24 Q. And as we've sat here and talked about it a
25 little bit, has it sparked your memory as to what that

1 doctor's name might have been?

2 A. No. Unfortunately, no.

3 Q. I'm trying. I'm trying. Okay.

4 MS. CRESTANI: Counsel, if he figures it out,
5 we can just let you know anyway.

6 MR. COOLEY: Yeah, absolutely. That would be
7 great.

8 BY MR. COOLEY:

9 Q. Let's talk about your knees. When was it you
10 first started to notice some problems with your knees
11 as a result of your work?

12 A. 2011.

13 Q. What sort of problem were you having with your
14 knees in 2011?

15 A. Pain on the sides of my knee, like on the
16 inside of my knees. On both of them.

17 Q. And did you notice anything that you were
18 doing when the pain would come on?

19 A. Getting in and out of a patrol car.

20 Q. And did you ever get medical treatment for
21 your knees?

22 A. No.

23 Q. Have you had pain in your knees from 2011 to
24 the present?

25 A. Yes.

1 Q. Besides getting in and out of a car, have you
2 noticed anything else that causes you issues with your
3 knees?

4 A. Getting in and out of a chair. Sometimes just
5 walking.

6 Q. Have you noticed anything that makes your
7 knees feel better?

8 A. No.

9 Q. So where am I? I guess we're on your
10 shoulders now.

11 Now, your original application just said the
12 left shoulder, but today you said the right shoulder as
13 well?

14 A. Yes, sir.

15 Q. Did you have problems with both shoulders at
16 the same time, over time or?

17 A. No.

18 Q. Okay. So is the earlier shoulder, the first
19 one, the left, that you had earlier problems with?

20 A. Yes.

21 Q. And when was it that you first had any
22 problems with your left shoulder?

23 A. 2009.

24 Q. And what sort of problems were you having with
25 your left shoulder?

1 A. I felt a sharp pain in my left shoulder.

2 Q. And did you attribute anything to that pain?

3 Like --

4 A. Like what possibly caused it?

5 Q. Yeah.

6 A. What I was doing? I'm sorry, I don't

7 understand the question.

8 Q. Like maybe what caused it?

9 A. I was bench pressing.

10 Q. So you were exercising and got a pain in your
11 shoulder?

12 A. I was on duty and that's the first time I ever
13 felt the pain, when I was on duty working out.

14 Q. Did you ever get medical treatment for that
15 left shoulder?

16 A. No.

17 Q. And did the left shoulder pain that you were
18 having stay with you from 2009 to the present?

19 A. Yes, sir.

20 Q. And does your left shoulder hurt all the time,
21 or is it on occasion?

22 A. On occasion.

23 Q. And how frequently would you say that you have
24 left shoulder pain?

25 A. Daily.

1 Q. And how long will it last when you have left
2 shoulder pain?

3 A. A few minutes.

4 Q. And do you notice anything that brings on the
5 shoulder pain as opposed to anything else?

6 A. Yes.

7 Q. What sort of things bring on the shoulder
8 pain?

9 A. If I'm reaching up high, if I extend my arm
10 out far to the left. And sometimes it just -- I just
11 start getting a pain in my shoulder just in the
12 kitchen, like putting dishes away or something. Or at
13 work picking up stuff from my office, sometimes I'll
14 just feel the pain in my shoulder.

15 Q. Okay. And do you notice how long -- do you
16 notice anything that makes your left shoulder pain feel
17 better?

18 A. No. I mean, obviously I try not to do those
19 things, or some of those things.

20 Q. How about your right shoulder? When did you
21 first start having problems with your right shoulder?

22 A. That was recent as of two weeks ago.

23 Q. What sort of problems are you having with your
24 right shoulder?

25 A. Just pain in my shoulder.

1 Q. Is the pain the same or different from the
2 left side?

3 A. It's the same but at a lower scale or lower
4 level.

5 Q. Okay. So what fraction would you put on it as
6 far as compared to the left?

7 A. So fraction, you mean like if the left is a 5,
8 the right would be a 2.

9 Q. Okay.

10 A. If that answers your question.

11 Q. Well, mathematically that's saying that the
12 right is like 40 percent of what the left is?

13 A. Yes.

14 Q. All right. And you also have the pain with,
15 like, extending over your shoulder level or reaching
16 out to the right --

17 A. Yes.

18 Q. -- or to the left?

19 A. Yes. Correct, yes.

20 Q. And have you had any medical treatment for
21 your right shoulder?

22 A. Yes.

23 Q. What medical treatment have you had for your
24 right shoulder?

25 A. I went to urgent care for it.

1 Q. And which urgent care was that?

2 A. It's in Valencia. And I just went a few weeks
3 ago.

4 Q. What's the urgent care place called?

5 A. I don't have it with me at this moment. I
6 have it at work, sorry.

7 Q. You said in Valencia. Do you recall what
8 street it was on?

9 A. No. I had never been there before, so.

10 Q. Okay. And what sort of treatment did you get
11 there at the urgent care? What did they tell you?

12 A. They put me on light duty and they gave me
13 some restrictions. That was it.

14 Q. Are you currently on light duty at work?

15 A. No.

16 Q. So how long were you under the restrictions?

17 A. A week.

18 Q. So have we covered all the various problems
19 that you're having with your body as a result of your
20 work?

21 A. I think we've covered everything.

22 MS. CRESTANI: I think there was also vision
23 you mentioned.

24 MR. COOLEY: Oh, that's right, the vision.

25 ///

1 BY MR. COOLEY:

2 Q. What sort of problems are you having with your
3 vision?

4 A. I am farsighted. And that's my personal
5 opinion; it's not a medical diagnosis.

6 Q. Okay. When did you first notice you were
7 having trouble with your vision?

8 A. Give me a minute here. Around 2013.

9 Q. You ever go to an eye doctor?

10 A. Have I ever been to one? Yes, I've been to
11 one.

12 Q. When is the most recent time you've been to
13 the eye doctor?

14 A. Three, four years ago.

15 Q. Do you have a regular eye doctor?

16 A. No.

17 Q. So which eye doctor did you go to three or
18 four years ago?

19 A. I don't recall. I only went one time. I
20 couldn't tell you.

21 Q. Did that doctor give you any diagnosis?

22 A. I went -- I didn't go there for this. I went
23 there to get some reading glasses.

24 Q. And did you get the -- did you go to the eye
25 doctor through your health insurance?

1 A. No.

2 Q. Do you recall what town the eye doctor was?

3 A. No. Santa Clarita, Valencia -- Valencia.

4 Q. Do you recall the street they were on?

5 A. Cinema Drive.

6 Q. Now, have you ever gone to any visits to an
7 eye doctor or eye professional about this farsighted
8 issue that you're talking about?

9 A. No.

10 Q. And besides feeling like you're farsighted,
11 have you noticed any other problem with your vision?

12 A. No.

13 Q. So do you notice anything that -- what is it
14 about your work you think is affecting your vision?

15 A. Staring at a screen, a computer screen.

16 Q. And how long during the day do you think you
17 do that?

18 A. Hours.

19 Q. Anything else you notice about your work that
20 you feel affects your vision?

21 A. No.

22 Q. Have you noticed anything off work that you
23 feel affects your vision?

24 A. Yes.

25 Q. Like what?

1 A. When I try to read something that has small
2 writing, I really strain my eyes to try to read it.

3 Q. Anything else about your vision that you
4 notice that you think is --

5 A. No.

6 Q. All right. So now I think we've talked about
7 everything.

8 A. I think so as well.

9 MS. CRESTANI: Yes.

10 BY MR. COOLEY:

11 Q. Okay. Do you currently have a hunting
12 license?

13 A. No.

14 Q. Have you had a hunting license?

15 A. No.

16 Q. Do you belong to any sort of gun club?

17 A. No.

18 Q. Do you ever recreationally go to the gun
19 range?

20 A. No.

21 Q. Do you do any work with power tools at home?

22 A. Sometimes.

23 Q. How often do you think you might do work with
24 power tools?

25 A. Maybe once every six or eight weeks.

1 Q. When you do work with power tools at home, do
2 you wear hearing protection?

3 A. No.

4 Q. When you train at the County of Los Angeles
5 and there's going to be firearms use, do you wear
6 hearing protection then?

7 A. Yes.

8 Q. Do you belong to any clubs, groups, or
9 organizations?

10 A. No.

11 Q. Do you have any hobbies?

12 A. I like to take walks. I like going camping,
13 fishing.

14 Q. When you go for walks, how far will you walk?

15 A. Less than a quarter of a mile.

16 Q. When was the last time you went camping?

17 A. A year and a half, two years ago.

18 Q. Do you have any pets?

19 A. Yes.

20 Q. What kind of pets do you have?

21 A. A Maltese and a Sheepadoodle.

22 Q. What's a Sheepadoodle?

23 A. A Sheepadoodle is a combination of Poodle and
24 an English Sheep Dog, which used to be called mutts;
25 now they're designer dogs.

1 Q. Very nice.

2 Have you been in any motor vehicle accidents
3 where you needed medical treatment?

4 A. No.

5 Q. Have you ever been injured in an accident or
6 incident or occurrence where you had a claim against
7 another person or company?

8 A. No.

9 MR. COOLEY: Counsel, do you have any
10 questions?

11 MS. CRESTANI: I do not. Not at this point,
12 no.

13 MR. COOLEY: All right. How long did we prep
14 for this?

15 MS. CRESTANI: It was approximately
16 45 minutes.

17 MR. COOLEY: Okay. I'm going to offer to
18 relieve the court reporter of her duties under the Code
19 of Civil Procedure. I would like her to prepare a
20 transcript, send it to applicant's attorney's office;
21 that sometime within 45 days of the date that's
22 provided, the applicant review the transcript, sign it
23 under penalty of perjury; and that if changes are
24 deemed necessary, then written notice be sent to
25 defense counsel's office; that the applicant's

1 attorney's office keep the original transcript for
2 evidentiary use in this matter. And that if for some
3 reason the original is unavailable or unsigned, a
4 certified copy can be used in its place.

5 MS. CRESTANI: So stipulated.

6 (Ending time: 3:02 p.m.)
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DECLARATION UNDER PENALTY OF PERJURY

I, the undersigned, declare under penalty of perjury that I have read the entire foregoing transcript of my deposition or the same has been read to me, and the same is true and accurate, save and except for changes, corrections, additions or deletions indicated by me on the DEPOSITION ERRATA SHEET hereof, with the understanding that I offer these changes as if still under oath.

Signed on the _____ day of _____,
20_____, at _____, _____.
(City) (State)

JULIEN OLIVIER

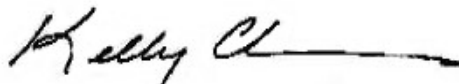
1 I, KELLY CHAPMAN, CSR No. 13727, certify: that
2 the foregoing proceedings were taken before me at the
3 time and place herein set forth; at which time the
4 witness was duly sworn; and that the transcript is a
5 true record of the testimony so given.

6 Witness review, correction, and signature was
7 () by code. (X) requested.
8 () waived. () not requested.
9 (X) not handled by the deposition officer due to party
10 stipulation.

11 The dismantling, unsealing, or unbinding of the
12 original transcript will render the reporter's
13 certificate null and void.

14 I further certify that I am not financially
15 interested in the action, and I am not a relative or
16 employee of any attorney of the parties, nor of any of
17 the parties.

18 Dated this 1st day of September, 2021.
19
20
21

22 

23 _____
24 KELLY CHAPMAN
25

Errata Sheet

NAME OF CASE: JULIEN OLIVIER vs COUNTY OF LOS ANGELES

DATE OF DEPOSITION: 08/20/2021

NAME OF WITNESS: Julien Olivier

Reason Codes: 1. To clarify the record.

2. To conform to the facts.

3. To correct transcription errors.

Page _____ Line _____ Reason _____

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