

Deposition:

Please state your name for the record. Michael Anderson. And how do you spell your last name, Mr. Anderson? A-N-D-E-R-S-O-N. Anderson, are you aware that today's proceedings are a legal deposition and that you are under oath to tell the truth, the whole truth, and nothing but the truth? Yes, I am aware. Thank you. Mr. Anderson, were you employed by Acme Corporation from [Start Date] to [End Date]? Yes, I was. I worked in the marketing department as a graphic designer. During your employment with Acme, can you describe your job duties and responsibilities? I was responsible for developing and designing various marketing materials such as brochures, advertisements, and product packaging. I also assisted with website design and social media graphics. Throughout your employment at Acme, did you receive any performance reviews? Yes, I received annual reviews. All my reviews consistently rated me as "meeting expectations" or exceeding expectations in certain areas. Did you ever receive any disciplinary actions or warnings during your employment with Acme? No, I never did. Mr. Anderson, during your time at Acme, did you witness or experience any situations that you felt could be considered discriminatory based on your [Protected category, e.g., age, race, gender]?

Summary:

The excerpt is from a legal deposition of Michael Anderson, who is under oath to tell the truth. Mr. Anderson confirms his employment at Acme Corporation as a graphic designer and details his job duties. He also confirms receiving positive performance reviews and never facing disciplinary actions. The excerpt ends with a question about witnessing or experiencing any discriminatory situations at Acme.

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Objection, that question calls for legal conclusions from the witness. Withdrawn. Mr. Anderson, please describe any specific incidents or instances at Acme that involved your [protected category]. There were several things that made me feel uncomfortable. During meetings, colleagues often talked over me or dismissed my ideas, particularly when compared to my younger male colleagues. I was also consistently passed over for promotions despite having experience and qualifications comparable to others who got promoted. Mr. Anderson, can you be specific about which colleagues treated you this way and provide specific examples of situations where these incidents occurred? One specific example would be the marketing campaign for the new product launch in 2023. I put significant effort into developing design concepts, but they were ultimately disregarded without any explanation. My male colleague's design, which was very similar to mine, was ultimately chosen. Did you ever report any of these incidents to your supervisor or anyone else at Acme? I once mentioned feeling undervalued to my supervisor, but they brushed it off, suggesting I needed to "work harder to prove myself." I wasn't comfortable bringing it up further after that. Did you decide to leave Acme voluntarily, or were you terminated? When they announced another promotion I felt qualified for, but was once again passed over without explanation, I decided it was time to find a new position where I felt valued and respected. Mr. Anderson, can you confirm that your decision to leave Acme was solely based on not receiving the promotion, and not due to other factors like job performance or personal reasons? To the best of my knowledge, yes. It became clear to me that further advancement opportunities within the company were unlikely. That's all my questions at this time. Mr. Anderson, during your time at Acme, did you ever receive any negative performance reviews or warnings related to your work performance? No, as mentioned before, my performance reviews were always positive. Did you ever attend any diversity and inclusion training offered by Acme during your employment? I did participate in the mandatory online training modules, but there weren't any specific training sessions related to addressing or reporting potentially discriminatory situations within the company.

Summary

The follow-up questioning delves deeper into Mr. Anderson's experiences at Acme. He details specific examples of feeling sidelined and undervalued, particularly compared to younger male colleagues. He mentions the disregarded product launch design concept and instances of being passed over for promotions despite his qualifications. While not explicitly stating "discrimination," he highlights feeling uncomfortable and unappreciated. When pressed for specific actions taken, he mentions mentioning his feelings to a supervisor who dismissed them. He refrained from further complaints due to discomfort. He clarifies that his decision to leave stemmed from the lack of advancement opportunities and feeling undervalued, not performance issues or personal reasons. He reiterates his positive performance reviews and confirms attending mandatory online diversity training, but mentions a lack of specific training related to addressing potential discrimination.

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Mr. Anderson, are you aware of Acme's anti-discrimination policy or how complaints of discrimination are addressed within the company? I reviewed the employee handbook, which did explain the existence of an anti-discrimination policy. However, I was unsure of the specific complaint process at the time. Mr. Anderson, can you elaborate on why you felt apprehensive about bringing up these incidents to your supervisor despite feeling uncomfortable and undervalued? Honestly, there were a few reasons. Firstly,

as I mentioned, when I did hint at feeling undervalued to my supervisor, their dismissive response discouraged me from further discussions. It seemed like they weren't receptive to hearing about any potential issues. Secondly, there was a general company culture that made me hesitant to speak up. Younger male colleagues often dominated conversations and presentations, and there weren't many women in senior positions within the marketing department. It felt like my voice wouldn't be heard or even worse, that bringing forward complaints might lead to retaliation or hinder my career further. Did you notice any specific instances of retaliation against other employees who may have raised complaints or concerns about work environment issues? While I can't say for sure, there was one colleague, Sarah Lopez, who openly challenged gender bias during a department meeting but was subsequently given less desirable project assignments compared to her male colleagues. This incident definitely reinforced my concerns about potentially facing a similar situation. Objection, speculation about an unrelated case is irrelevant to the present matter. Withdrawn. Mr. Anderson, did you ever discuss your concerns about potential bias or lack of promotion opportunities with any human resources personnel at Acme? No, I didn't. As I mentioned before, the lack of clarity on the specific complaint process combined with the overall culture discouraged me from pursuing that route. Mr. Anderson, since leaving Acme, have you sought employment elsewhere? Yes, I am currently employed at a different company and feel much more valued and respected in my current role. The work environment is significantly more inclusive, and I regularly receive positive feedback and opportunities for professional development. Mr. Anderson, how has your experience at Acme impacted you personally and professionally? It was definitely a frustrating and discouraging experience. It felt like my hard work and qualifications weren't being recognized fairly, leading to some self-doubt and a sense of being undervalued. However, finding a new and positive work environment has helped me rebuild my confidence and refocus on my career goals. I have no further questions.

Summary

In an exit interview, Mr. Anderson explains his decision to leave Acme Corporation. He felt discouraged by his supervisor's dismissal of his concerns and the company culture, which he perceived as unreceptive and potentially punitive. He mentions a colleague, Sarah Lopez, who he believes faced consequences for speaking up. Although he didn't formally file a complaint, he emphasizes the unclear process and the unwelcoming company environment. Finally, Mr. Anderson confirms his new job and highlights its positive aspects, contrasting them with his experience at Acme. He acknowledges the initial negative impact of his time at Acme, including frustration and self-doubt, but emphasizes that his current position has helped him regain confidence and refocus his career goals.

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I have one final question. Mr. Anderson, is there anything else you would like to add regarding your experience at Acme Corporation? Just that I hope by sharing my story, it can contribute to fostering a more diverse and inclusive work environment at Acme for future employees. Everyone deserves to feel valued and respected in their workplace, regardless of their [protected category]. Interesting point, Mr. Anderson. Ms. Garcia, while you have no further questions, I'd like to explore some aspects of Mr. Anderson's experience further before concluding the deposition. No objection. Please proceed, Mr. Thompson. Mr. Anderson, you mentioned feeling unsure about the specific complaint process at Acme. Did you take any steps to learn more about it after your meeting with your supervisor? No, I didn't feel comfortable approaching my supervisor again after their dismissive response. Additionally, I recall the employee handbook being quite lengthy, and finding specific information about the complaint process

proved difficult at the time. You mentioned a colleague, Sarah Lopez, who voiced concerns about gender bias. Did you ever speak to her directly about her experience and the alleged retaliation she faced? Briefly, yes. We expressed our mutual frustrations and the feeling of being undervalued within the department. However, we were both hesitant to pursue any formal complaints due to the aforementioned concerns about the company culture and potential retaliation. Did you ever discuss the issue of lack of promotion opportunities with any other colleagues, particularly women in the marketing department? Not directly. While there were a few women colleagues in the department, none of them were in senior positions. The general environment discouraged open communication about potentially sensitive topics like discrimination. Mr. Thompson, I object to leading the witness. Can you rephrase your question and allow Mr. Anderson to answer in his own words? Apologies, Ms. Garcia. Mr. Anderson, to clarify, did you have any informal conversations with other colleagues about your concerns regarding promotion opportunities or potential gender bias within the marketing department at Acme? There weren't any specific discussions about promotions or bias, but the general atmosphere around the lack of female representation in senior positions was a frequent topic of quiet observation amongst some female colleagues. We felt implicit pressure to work harder and prove ourselves more than our male colleagues, but reaching leadership positions seemed like an increasingly distant prospect. Mr. Anderson, can you elaborate on what kind of "pressure" you felt, and was there any specific instance or behavior from colleagues or superiors that made you feel this way?

Summary

Mr. Anderson is wrapping up his deposition. He expresses hope that his story will contribute to a more positive and inclusive work environment at Acme for future employees. The interviewer, Mr. Thompson, has some additional questions. He asks Mr. Anderson about the complaint process at Acme and whether he tried to learn more about it after his supervisor dismissed his concerns. Mr. Anderson admits he felt uncomfortable going back to his supervisor and the employee handbook was difficult to navigate. The conversation then turns to Sarah Lopez, a colleague who mentioned experiencing gender bias. Mr. Anderson confirms having a brief conversation with her where they shared frustrations and felt undervalued. However, both were hesitant to file formal complaints due to concerns about the workplace culture. Mr. Thompson then asks about discussions regarding lack of promotion opportunities for women. Mr. Anderson clarifies that while there weren't specific discussions, the lack of women in senior positions and the overall environment discouraged open communication about sensitive topics like gender bias. He describes a feeling of implicit pressure to outperform male colleagues, but achieving leadership positions seemed unlikely. Finally, Mr. Thompson asks Mr. Anderson to elaborate on the pressure he felt. Mr. Anderson is asked to provide specific examples, and the excerpt ends there.

Deposition

It wasn't any direct confrontation or statement, but more of a subtle feeling arising from observing the lack of female representation in leadership roles combined with certain comments about needing to "work harder" or "prove myself" despite my consistent positive performance reviews. Thank you, Mr. Anderson. These are valuable insights. Do you have any further questions, Ms. Garcia? (after reviewing her notes) I have a few follow-up questions for clarification. However, due to the time constraints, I would like to schedule a follow-up session at your earliest convenience, Mr. Thompson, to continue exploring specific details and potential evidence. No objection. Mr. Anderson, are you available for a follow-up session within the next week? Yes, I am available. Please let me know the details when you've

scheduled it Mr. Anderson, since our last session, have you had any time to review Acme Corporation's employee handbook pertaining to the complaint process for potential discrimination? Yes, I have. Can you briefly describe the steps outlined in the handbook for filing a complaint based on potential discrimination? The handbook mentioned employees could submit a written complaint to the Human Resources department or verbally report it to an HR representative or any manager. However, specific details about the investigation process or resolution options were quite vague. Mr. Anderson, did the employee handbook specify who constitutes a "manager" authorized to receive such initial verbal complaints? No, it didn't provide any specific details about which managers were included in that definition or if all managers were authorized to receive such reports. Mr. Anderson, you previously mentioned frustration with receiving similar design concepts to yours being chosen over your own work while working at Acme. Do you still have copies of these original design concepts and the final versions ultimately used? Unfortunately, I didn't retain individual copies of every design iteration. However, I did maintain some preliminary sketches and digital drafts from several projects, including the one discussed earlier related to the 2023 product launch campaign. Would you be willing to provide these materials as potential evidence in this case? Yes, I can bring them to the next session. Mr. Anderson, are you aware of other colleagues who may have retained copies of their rejected design projects or drafts during their employment at Acme? I'm not certain, but I remember several colleagues raising concerns about the inconsistent feedback and selection process for design concepts. It's possible some of them might have kept records for their own reference. We will look into that possibility. Mr. Anderson, during your time at Acme, did you ever meet or hear about any employees who filed official complaints based on experiencing discrimination? Not officially. As mentioned earlier, there was an underlying lack of transparency and open communication around potentially sensitive topics like discrimination. Therefore, it was difficult to know for sure. Mr. Anderson, did you receive any additional training or workshops related to diversity and inclusion since leaving Acme Corporation? Yes, my current employer offers comprehensive training programs and workshops regarding diversity and inclusion as part of their ongoing commitment to a fair and equitable work environment. Do you find these additional training programs and the overall work environment at your current company to be beneficial compared to your experience at Acme? Absolutely. The focus on creating a safe space for open communication, valuing diverse perspectives, and providing equal opportunities for growth has been incredibly positive and empowering. No further questions at this time. Mr. Anderson, as mentioned previously, we would like you to bring copies of the design materials you retained for the next session. Additionally, I may reach out to inquire about potential colleagues who might have kept similar records. Is that alright? That's perfectly fine. Please let me know if you need anything else in the meantime. Mr. Anderson, one final question before we adjourn. You mentioned feeling hesitant to bring up your concerns to your supervisor after their dismissive response. Did their reaction specifically mention any consequences of raising the potential bias issue? Not directly. There wasn't an explicit threat of any sort. However, their dismissive tone and the implication that my concerns weren't valid created an atmosphere where I felt further discussion would be futile and potentially disadvantageous. Objection, speculation about the witness's interpretation of a supervisor's tone is not based on facts. Reframing, Mr. Anderson. How did your supervisor's response make you feel about the potential consequences of reporting your concerns? Their response discouraged me and made me feel unheard. It conveyed the impression that my concerns about potential bias wouldn't be taken seriously and could potentially hinder my career progression within the company.

Summary

In a follow-up deposition, Mr. Anderson clarified details about the complaint process at Acme and confirmed reviewing the employee handbook. He mentioned the process outlines submitting a written complaint to HR or verbally reporting it to an HR representative or a manager, but lacking specifics about investigations or resolutions. He couldn't recall specific details about managers authorized to receive verbal reports. Mr. Anderson admitted not keeping all design iterations but having some sketches and drafts from specific projects, including the 2023 product launch campaign, which he offered as potential evidence. He suggested some colleagues might have retained similar records due to shared concerns about the selection process. While not aware of official complaints, Mr. Anderson confirmed a lack of transparency around discrimination at Acme. He contrasted his current work environment which offers diversity and inclusion training and fosters open communication, creating a more positive and empowering experience compared to Acme. The session ended with Mr. Anderson agreeing to bring design materials and potentially connect the interviewer with colleagues who might have kept similar records. He clarified that while his supervisor's response didn't explicitly mention consequences, the dismissive tone discouraged him and made him feel unheard, implying potential career repercussions for raising concerns about bias.

Deposition

Mr. Thompson, I believe we've covered the essential topics for today. However, as these are complex claims, I would appreciate the opportunity to review the transcript and potentially ask further questions at a future session, should any need arise. No objection. Mr. Anderson, as Ms. Garcia mentioned, we appreciate your willingness to cooperate and provide additional materials. We will be in touch to schedule a follow-up session if needed. Understood.

Summary

Both parties agreed to conclude the deposition. The interviewer, Mr. Thompson, expressed the possibility of needing a follow-up session after reviewing the transcript and potentially having further questions. Mr. Anderson acknowledged this and confirmed his availability if needed.

Deposition

A driver is obligated to pay attention to the road and yield to other drivers when required. Let me take you back to what happened on April 20th, 2022. The Defendant, who was an attorney for the IRS, was driving her usual route to work. She drove down Annapolis Road to take a left onto another road. (Could we have the next slide, please?) She was driving down this road... can everyone see this? She stopped at a light on a clear day. While stopped, she reached down to find her parking pass. May we approach? Yes. BENCH CONFERENCE (Bench Conference begins – 10:26:39m.) (The parties approach the bench for a discussion.) By court ruling, liability has been established. The focus of this case is only on damages. I understand why we're discussing these details, but it's about damages. I'm setting the scene for the accident because her damages are part of the accident narrative. We're only discussing the fact that an accident happened and a person was injured. The details about reaching and negligence seem to be evidence of liability. I understand. It's your opening statement, so I'll give you some leeway. I'm just providing context. I'll be getting into the damages soon. Alright. (Bench Conference concluded –

10:27:32 m.) (The parties return to their places.) The Defendant heard a horn beep and took a left turn. She didn't see the Plaintiff, who had the right of way, coming from the opposite direction. Due to the collision, the Plaintiff's ankle was broken and required surgery. Take a look at these images. The first one shows her ankle before surgery, the second one after surgery. Today, she still has 15 screws and three plates in her ankle. She will never be able to run again and standing for extended periods of time is difficult. We've brought this case before you because of the harm caused to the Plaintiff. We needed to agree that the Defendant was at fault for the accident, which she has accepted. We also had to understand the extent and implications of the Plaintiff's damages, not just the initial injury and surgery, but also its long-term impact on her life. To do this, we spoke to her doctors, her husband, her friends, and even her employer. One of her doctors is going to talk to you. This is the guy to see if something awful like this is going to happen to your ankle. He received an Ivy League education and, at one point, was the chief of foot and ankle orthopedic injuries at Johns Hopkins. He consults for the Baltimore Orioles. His resume, I want to say, is as long as your arm, but it's actually a lot longer than that. We're going to bring him to talk to you guys, in a very 2023 way. It's going to be by videotape, so his testimony will be by videotape, but it holds the same force as if it was at trial, and he came here to see us. And, of course, my partner Laura Zois and the defense attorney had an opportunity to ask him questions. He's going to tell you she still has 15 screws and three plates in her ankle holding everything together. The problem with that is that it creates a breeding ground for arthritis, and this 33-year-old woman already has the signs of arthritis. At some point, she's going to need what's called a fusion, which will stabilize her ankle. The bad news is, you can't move it once it locks, so you no longer have the ability to bend. This trial is about the harms and losses that she has suffered and endured as the result of this accident. This is not a case about sympathy. You should not award her damages because you feel sorry for her. You're going to hear about how the accident has impacted her professional and personal life. At the time of the crash, they were a very young family. They were an energetic family. This is an active family with four kids doing everything you can imagine, Six Flags, the park. They would run together. They played basketball together. They traveled everywhere, New York, Baltimore, Washington, DC. They were just a very active family. And she also had a vibrant social life. She was a hairstylist, and she loved that job. It was her social outlet beside her kids. She would do the church choir every Wednesday, and still found times to go out and see her family. She's still fighting with her family, but it's hard. She can't work as a hairstylist anymore. So what did she do? She went back to school to the University of Maryland. She's working, getting very close to getting her degree. She's still fighting. She has four kids they're chasing around. Let's go back and talk about how it ended up. Let's talk about the accident. She had this awful crash and needed emergency surgery where they put in these screws. She had a nine-month-old baby, along with three other kids. She and the two girls, the younger ones, went to live with her mom. Her mom took care of her and the girls, while her husband took care of the other kids. This has been a massive disruption to their lives. The accident has completely changed her life, and it's reflected in every facet of her day-to-day. Her job, her family life, her hobbies, everything she used to take pleasure in has been impacted in one way or another. And the evidence in this case will show these changes are likely to persist for the rest of her life. We ask you to consider the totality of these changes, the persistent harm and loss she's suffered and will continue to suffer, as a direct result of the accident. We ask you to consider these when coming to a decision in this case. This accident, however, led to an upheaval in their lives. About a month after the accident, she managed to return home with the kids. Her mother, an FDA employee, took three months off work to care for her, her daughter, and her grandchildren. The accident wreaked havoc on their lives. She endured six months of rigorous physical

therapy and another operation. While it was painful and difficult, the effort was worthwhile as it improved her condition, especially her ankle, though we wish she had recovered more. As we delve into this case, it's about the harm and losses experienced. We will ask you to make amends where possible and provide compensation for the irreparable harm. The damages can be categorized into three parts: her medical bills, the post-accident trauma suffered by her and her family, and the pain she will endure for the expected next 45 years of her life. She was a spontaneous person, fond of making impromptu plans like going to Virginia Beach over the weekend or heading to the park. Now, every activity revolves around her ability to reach there, her mobility, and whether she can tolerate the pain during the trip. This situation has affected her and her four kids, as well as her husband. The court wants to clarify that the evidence and testimonies from the witness stand are what will control your deliberations. Opening statements and closing arguments of lawyers do not constitute evidence. This case is not just about the suffering of their children or her husband. It's about the impact of their suffering on her. We will ask you to consider an amount that may seem high at the beginning. But we believe that after hearing all the evidence, you'll find it to be a fair compensation for her losses and harm. The amount we suggest is \$1.1 million. Defense Opening Statement Regarding the defendant, they acknowledge the responsibility for the accident and that it was their fault. The case is for you to determine the appropriate damages. The injury is severe, and they ask for an extraordinary amount of compensation. She broke her ankle, which was repaired surgically with plates and screws. There was a second surgery due to loosening of the screws, which were then removed. She attended physical therapy, which improved her ability to move her ankle. Whether she will need surgery in the future is uncertain. The past medical expenses are around \$36,505, which we don't contest. Her lost wages due to the accident are around \$3,400 to \$3,500. These are not the focal points of this case. The main issue is the amount to be awarded for non-economic damages, for which we request something fair, reasonable, and sensible. Thank you for your time and attention, and we hope to conclude this case promptly.

Testimony of Victim's Husband Mr. Good morning. Can I have your address? Certainly. Mr. How long have you lived at that address? I bought the house in 2003, so it's been approximately ten years. Mr. Who lives there with you? My wife, and our four children. Mr. Can you tell the jury how old your children are and their names? Yes. My children are 13, and the others are... The Honorable Please continue. ...five, and three. Mr. I understand. And for some background, what do you do for a living? I'm currently the general manager at Oreck Clean Home Center. Mr. And where are these locations? We have six locations in Maryland and Virginia. Mr. What are your responsibilities at work? I oversee all six stores and manage one of them. Mr. Can you describe your work schedule? I work Monday through Saturday, from 10:00 am to 7:00 pm. Often, I work seven days a week which means working on Sundays from 12:00 pm to 5:00 pm. Mr. How do you feel about those hours? They are long, but I need to work to support my family. Mr. How long have you known your wife? I met her in 1993, she was my sister's best friend. Mr. You mean your wife was your sister's best friend? Yes, I apologize for the confusion. She was indeed my sister's best friend. Mr. Let's move to another topic. Do you remember the car accident your wife was in 2022? Yes, I do. Mr. Prior to the accident, can you describe your household? Our household was what I would consider the perfect life. My wife and children were happy and always engaged in activities. We used to take vacations and attend family reunions. Mr. Was your wife a spontaneous person or a planner? She was more spontaneous, always ready to take on new activities. Mr. Could you describe her for the jury? She is always happy, loves socializing and helping people. She attended choir rehearsal, Bible study every week, and also took care of our four children. Mr. What was her job at the time of the crash? She was the assistant manager of a hair salon. Mr. Did she enjoy her work? Yes, she loved her

work. It was part of her identity. Mr. Did your wife's demeanor change after the car accident? Yes, after the accident everything changed. Our family life and activity level changed significantly. She used to take the children to sporting events and practice basketball. Now, she can't do these activities. She no longer goes on family vacations. My two older sons call her "boring" now because of her reduced activity level. The accident has restricted her capabilities and as a result, she can't even do simple tasks like carrying laundry baskets or standing up to cook. Our family life has changed drastically since the accident. Mr. Has your wife gone back to work since the accident? She tried to help a friend out a couple of months ago at her hair salon, but it ended with her in a lot of pain due to the swelling in her ankle. Mr. I have here a picture you received from your wife. Is this the picture she sent you? Mr. Can you tell us how your wife's personal social life has been affected since the crash? Her social life has indeed changed significantly. Before the accident, she would regularly go out with friends, engage in dancing, and other social activities. However, the constant pain and discomfort after the crash have made such activities impossible. Her social life is definitely not the same as before. Mr. You mentioned earlier about her job. Was she able to resume work post the crash? She attempted to return to work, but the persistent pain made it unmanageable, particularly the long-standing hours. Eventually, she was forced to leave her job. Mr. How has this situation impacted your family's finances? The impact has been substantial. She held the position of an assistant manager at a hair salon, bringing in a significant income. Now, with my single income, managing expenses for our four children and her medical bills has been strenuous. Mr. Besides the financial struggle, can you share how your relationship with your wife has evolved post the accident? Our relationship has undeniably been affected. She isn't the same person she was before the crash. Her constant pain and fatigue, coupled with frustration, have been hard on both of us. Mr. And your children? How have they been coping with all these changes? Our children have had to make significant adjustments. They miss the mother they had before the crash, not understanding why she can't engage in the activities she used to do with them. My older sons, in particular, have had to step up, assisting more with household chores. It's been a lot for them too. Mr. Finally, could you share your hopes for your wife's future? My biggest hope is for her to find relief from her pain and regain some semblance of normalcy. She deserves to live her life, not just endure it. It's challenging to see such a wonderful person go through this. We are taking each day as it comes, hoping for a better future.

Defense Attorney Cross Examination of Victim's Husband Regarding the foot stretching exercises, you assist her with those? Yes, I do. Looking through her medical records, I noticed there's mention of an exercise bike at home. Do you have one? Indeed, we do have an exercise bike at home. Did she frequently use the exercise bike, especially post-accident? Initially, during her therapy, they had her try riding the exercise bike. Can you tell us what kind of exercises she did at home after the accident? She was given a chart with exercises, and I've been helping her to flex her foot in both directions to try and loosen it up. How long did this routine last? Actually, I still assist her with the foot exercises every night. So you assist her based on the instructions from the chart? Not directly from the chart, but I've learned the correct angles and try to flex her foot every night for her comfort and to aid her sleep. Does she drive? Yes, she does. Prior to the accident, she was employed full time? Yes, that's correct. The jury was informed initially that she was also pursuing a degree? Yes, she was attending the University of Maryland. Did she commute to the university? At certain points she did, but due to our four children, she primarily takes her classes online now. How close is she to obtaining her degree? She's expected to graduate within the next year. Any redirect? Mr. No further questions, Your Honor. Thank you, sir, you may step down. Proceed with your next witness. (Witness excused – 11:56:56 a.m.)

Summary

A woman is suing another driver, an attorney, for damages caused by a car accident. The defendant has admitted fault, and the case revolves around the compensation the injured woman deserves. The woman suffered a broken ankle requiring surgery and therapy. She still experiences pain and limited mobility, impacting her daily life and activities. She had to quit her hairstyling job and is now pursuing a degree to explore new career options. The accident also significantly affected her family life, including her social life, ability to participate in activities with her children, and her relationship with her husband. The woman seeks \$1.1 million in compensation for her medical expenses, lost wages, pain and suffering, and the long-term impact on her life. The defense acknowledges the severity of the injury but questions the requested amount. They point out that the woman can still drive, is pursuing a degree, and hasn't exhausted all treatments, like using an exercise bike at home. The case hinges on determining the extent of the woman's long-term suffering and the impact on her life, balanced against the evidence presented by the defense regarding her ongoing activities.