

DEPOSITION OF JOHN DOE  
SUPERIOR COURT OF CALIFORNIA  
FOR THE COUNTY OF SIERRA

Taken March 15, 2024

Recorded by Certified Court Reporters  
Jane Green, Certification No. 238876543

*Doe v. Sierra County and Fairs Are Us*

Sierra County Superior Court Action No. 24-SUP-659480

**Present:**

**Plaintiff's Counsel:** Jane Smith, Esq.

**Defendants' Counsel:** Robert Brown, Esq.

**On the Record:** 8:35am

**Court Reporter:** Please raise your right hand. Do you swear or affirm to tell the truth, the whole truth, and nothing but the truth?

**John Doe:** I do.

**Court Reporter:** Please state your name for the record.

**John Doe:** John Doe.

**Defendants' Counsel:** Good morning, Mr. Doe. My name is Robert Brown, and I represent Sierra County and Fairs Are Us in this matter. Could you please state your full name and address for the record?

**John Doe:** Sure. My name is John Doe, and I live at 123 Elm Street, Anytown, USA.

**Defendants' Counsel:** Thank you. Mr. Doe, could you please describe your occupation?

**John Doe:** I'm a construction worker.

**Defendants' Counsel:** And how long have you been working in that field?

**John Doe:** For about 20 years now.

**Defendants' Counsel:** Let's talk about the incident on January 23, 2024. Can you describe what happened that day?

**John Doe:** Yes. I was at the Sierra County Fair with my two daughters, who are nine years old, and a couple of my co-workers. We were leaving the Tilt-A-Whirl ride when I tripped over a spike that was sticking out of the ground in the exit path.

**Defendants' Counsel:** What time did this incident occur?

**John Doe:** It was around 3:00 PM.

**Defendants' Counsel:** Can you describe the spike you tripped over?

**John Doe:** It was a metal spike, maybe about four inches high, sticking out of the ground. It was right in the path where people were exiting the ride.

**Defendants' Counsel:** What happened immediately after you tripped?

**John Doe:** I fell and landed awkwardly on my left ankle. I felt a sharp pain and couldn't stand up. I also felt pain in my back and neck.

**Defendants' Counsel:** Did anyone come to assist you?

**John Doe:** Yes, my co-workers and a fair staff member came over. They called for medical help, and I was taken to Sierra Vista Medical Center.

**Defendants' Counsel:** What kind of treatment did you receive at the medical center?

**John Doe:** They did some X-rays and found that I had a broken left ankle. I needed immediate surgery. They also noted that I had back spasms and a neck strain.

**Defendants' Counsel:** How long were you in the hospital?

**John Doe:** I was there for three days.

**Defendants' Counsel:** Are you currently receiving any treatment?

**John Doe:** Yes, I'm undergoing physical therapy for my ankle, and I'm also seeing a chiropractor for my back and neck.

**Defendants' Counsel:** How has this injury affected your ability to work?

**John Doe:** I can't return to my job as a construction worker. My doctor hasn't given me a timeline for when I might be able to go back to work.

**Defendants' Counsel:** Are you seeking compensation for lost wages?

**John Doe:** Yes, I am. I'm also seeking compensation for general damages, loss of household services, and other related expenses.

**Defendants' Counsel:** Mr. Doe, have you experienced any other impacts on your daily life due to this injury?

**John Doe:** Yes, I can't do many of the household chores I used to do, and I can't play with my daughters the way I used to. It's been very difficult.

**Defendants' Counsel:** Thank you, Mr. Doe. I need to ask you about your activities at the fair. Did you consume any alcohol that day?

**John Doe:** Yes, I did. I had four beers.

**Defendants' Counsel:** Over what period of time did you consume these beers?



**John Doe:** Over the course of about two hours.

**Defendants' Counsel:** Do you believe the alcohol affected your ability to safely navigate the fairgrounds?

**John Doe:** No, I felt fine and in control.

**Defendants' Counsel:** Did you notice the spike or any other unsafe conditions before you tripped?

**John Doe:** No, I didn't see the spike until I tripped over it. I wasn't looking for hazards specifically, but I didn't notice anything out of the ordinary before the accident.

**Defendants' Counsel:** Did you use the Tilt-A-Whirl ride before the incident?

**John Doe:** Yes, I went on the ride with my daughters.

**Defendants' Counsel:** Did you notice the spike or any other unsafe conditions while using the Tilt-A-Whirl or in the exit path before you tripped?

**John Doe:** No, I did not notice anything unusual when we got off the ride. It wasn't until I tripped that I saw the spike.

**Defendants' Counsel:** Thank you, Mr. Doe. I have no further questions at this time.

**Plaintiff's Counsel:** I have a few questions, Mr. Doe. Can you describe the condition of the fairgrounds on the day of the incident?

**John Doe:** The fairgrounds were crowded, and there were a lot of people around. The exit path from the ride was pretty narrow, and I didn't see the spike until it was too late.

**Plaintiff's Counsel:** Had you noticed any other hazards at the fair that day?

**John Doe:** No, I didn't notice anything else out of the ordinary.

**Plaintiff's Counsel:** Thank you, Mr. Doe. That's all I have.

**Court Reporter:** The deposition is concluded at 11:00 AM.