**John Smith Deposition Summary**

Counsel for Plaintiff: Jane Doe  
Counsel for Defendant: John Doe

Date of Testimony: 03/15/2024

| **Page/Line** | **Examiner** | **Summary of Testimony** | **Relevance** |
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| 3/12-15 | Jane Doe | Plaintiff is a 47-year-old construction worker with 25 years of experience. | Background of witness |
| 5/20-25 | Jane Doe | Plaintiff had no prior ankle problems before the accident. | Background of witness |
| 7/8-12 | Jane Doe | Plaintiff describes climbing a ladder to get tools when the ladder slipped and he fell. | Cause and circumstances of incident |
| 9/15-20 | Jane Doe | Plaintiff believes the ladder slipped because it was not secured at the top. | Cause and circumstances of incident |
| 11/2-5 | Jane Doe | Plaintiff admits he did not inspect the ladder before climbing it, assuming it was safe. | Perceptions of fault; potential for contributory negligence |
| 12/18-22 | John Doe | Plaintiff broke his left ankle in three places as a result of the fall. | Damages |
| 15/6-10 | Jane Doe | Plaintiff is still undergoing physical therapy and has not been able to return to work since the accident. | Damages |
| 16/24-28 | Jane Doe | Plaintiff is in constant pain and unable to perform daily activities as he used to. | Damages |
| 18/11-15 | Jane Doe | Plaintiff admits to doing light work on a side job while on disability. | Credibility; potential impact on damages |
| 20/5-8 | John Doe | Plaintiff acknowledges a discrepancy between his earlier statement and the incident report regarding ladder inspection, admitting he was mistaken in his testimony. | Credibility; potential impact on perceptions of fault |
| 25/19-23 | John Doe | Plaintiff's doctor expects a full recovery but notes it will take time. | Prognosis |
| 30/12-16 | Jane Doe | Plaintiff is hopeful for no long-term complications but acknowledges the possibility of risks. | Prognosis |