

CASE: Brown, et al v. Wayne Enterprises, et al
DEPOSITION OF: Plaintiff Jane Doe
DATE OF DEPOSITION: October 21, 2016

Page : Line	Summary
5:22 – 6:5	Deponent resides at 4000 Gotham Dr. with her mother. Moved in on 7/11/2011. Used to live at 1976 Corn St. where she stayed for two years.
6:21 – 7:10	Primary Care Provider: Golden Adult Medicine.
7:11 – 7:12	Currently unemployed.
7:13 – 8:1	Last employment was four years ago, with Red Door Inn in Executive Parkway. Worked as housekeeper for 8 months. Was laid off.
8:2 – 8:8	Claims to have headaches, difficulty breathing, trouble sleeping and some vomiting as a result of the demolition work on Dominican School.
8:15 – 8:18	When she moved in with her mother, she stayed in the back bedroom. Window was open, dust would come in, causing problems breathing. Also felt nauseated and had headaches.
9:8 – 9:16	Sought medical attention on a regular basis. Denies informing her doctors that her problems might be related to the Dominican School demolition.
10:3 – 10:12	Did not see any water being used during the demolition. Cannot recall seeing any evidence of water being used.
10:16 – 10:20	Did not make notes or take pictures during the demolition.
10:21 – 12:6	During the demolition: Had headaches once or twice a week at night. Took Tylenol and ibuprofen to treat headaches, which helped. Headaches lasted awhile after the demolition work stopped. Continues to have headaches.
12:7 – 12:9; 17:14 – 18:11	Uses an inhaler for her breathing problems, which was prescribed by Dr. Michelle Hubert. Last saw Dr. Hubert on 8/1 for routine checkup.

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12:10 – 14:24; 15:17 – 15:18	Used an inhaler before the demolition, when she was diagnosed with sarcoidosis by Dr. Hook about 10 years ago. Also took prednisone as prescribed by Dr. Hook. Has not had any breathing problems for years, until the Dominican School demolition. Has not seen Dr. Hook in years.
15:9 – 15:13	During the demolition: Felt she would run out of air. It was hard for her to breathe and felt as if her windpipes were closing up.
15:24 – 16:10	Studied in River High School. Reached 11th grade. Left school in 1982 because she got pregnant.
16:11 – 17:13	Has two daughters and a son, aged 32, 31 and 27. Children do not reside with her, and are not plaintiffs in this case.
18:12 – 18:21	Had difficulty sleeping because of the noise and the dust that came into her room during the demolition.
18:22 – 19:4	Doe affirms: Demolition work was done during daytime, and was disturbing to most people early in the morning.
19:5 – 21:9	Normally goes to bed between 10 and 11, and wakes up around 7:30 AM or sometimes later. For sleeping problems, Dr. Hubert prescribed “Adavil,” which helped. Sleeping problems disappeared when demolition work stopped.
21:10 – 22:11	Also experienced vomiting during the demolition. Threw up about 5-6 times or probably more. Informed Dr. Hubert about the vomiting. Doctor took some tests and said everything looked fine. Vomiting disappeared when demolition work stopped.
22:15 – 25:16	Has had sciatica for several years, which she attributes to her scoliosis. Sciatica and scoliosis have caused back pain, for which she takes Vicodin and sometimes Percocet. Also has pain radiating down to her legs and knees. Thinks these conditions were aggravated by the school demolition.
25:18 – 25:21	Ground shook as the school was being torn down. Shook their whole house.
26:12 – 28:14	States the floor of their house had tilted, “like we have a slant in our floor... downstairs on the main floor.” Steps outside their house are a little more wobbly since the demolition. Denies being aware of any cracks in the ceilings or walls, or any problems with the house, before the demolition work began.

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28:18 – 30:20	Confirmed she was suffering from depression. Has been treated for depression in Metro Hospital, in Tours Hospital, and in Peace and Quiet Behavioral Health Center in Wonderland. Sees Dianne Su, a psychologist and Dr. Michelle Do. Has been taking Celexa and Zoloft for about three years. Also takes Abilify, Vistaril, Neurontin, trazodone and Remeron; which have been prescribed “in December of this year.”
31:11 – 31:19	Denies speaking to any of the workmen at the demolition site. Denies overhearing the workmen make any statements to anyone in the neighborhood. Did not call to complain about the demolition work.
31:20 – 32:4	Claims she had to throw away personal property because it was damaged. Threw away “some dress shoes, some tennis shoes, some suede, about three pair of suede boots, jeans, some dress shirts, a couple of dresses, and a few skirts and two coats.”
32:5 – 32:21	Did not take pictures of the items before she threw them away. Tried to clean them and saw “gritty stuff” in the bottom of the washer.” Wore a couple of clothes, which made her itch.
32:22 – 33:15	Do not have receipts. Estimated cost: About \$1,500; probably more if bought new.
33:16 – 34:4	Items were kept in a clothes basket near the window of her room, while shoes were lined up on the floor. “Got messed up” when the dust came in through the window.
34:10 – 34:14	Dust still in the house and in her room.