

*SAMPLE DEPOSITION SUMMARY - STANDARD TWO-COLUMN FORMAT*

Deposition Summary  
of  
**John Smith, P.E.**  
March 15, 2000  
Bob Jones and Rachel Jones  
vs. Ashe County Road Commission, et al.  
Case No. ABCD

**Appearances:**

For the plaintiff:

Jones & Farmer, LLP  
By: Mr. Michael Martin, Esq.

For the defendant:

Calvert, Roberts & Rowe, LLP  
By: Mr. Albert Rowe, Esq.

**Defendants' Exhibits:**

1	Fee Schedule for John Smith	6
2	Murphy County Road Commission, Minimum Road Design Standards	6
3	Notes on the deposition of Michael Adams	11
	Defendant's Answers to Plaintiff's Interrogatories	11

Examination by **Mr. Michael Martin, Esq.**

Page:Line

Testimony

5:8	5:9	<b><u>Name &amp; Previous Depositions</u></b> The deponent states his name as John Albert Smith. He has deposed "many times" before. Deposition instructions are given. His address is 123 North St.
5:10	6:17	<b><u>Curriculum Vitae</u></b> Smith has provided a copy of his Curriculum Vitae (CV). It is no more than two years old. He has taken a couple of courses that are not listed in his CV. The first dealt with engineering bike paths and was offered by the Traffic Institute at Northwestern University in 1999. He cannot recall the topic of any additional courses. He still belongs to all of the organizations listed in his CV, and has added no others.
6:18	6:20	<b><u>Exhibit 1 - Fee Schedule</u></b> <b>Exhibit 1</b> is a copy of Smith's current fee schedule.
6:21	9:4	<b><u>Exhibit 2 - Minimum Road Design Standards</u></b> <b>Exhibit 2</b> is a five-page document that contains minimum road design standards for local roads in Murphy County as adopted 8/12/76. Smith obtained this document from Bob Jones, the Highway Engineer for Murphy County. Smith received this document in connection with a case involving the Murphy County Road Commission. The title of

the document is, "The Recommended Minimum Standards for Requirements for Local Road Construction." It applies to any new local roads. It also has broader applications to all of the roads in the Murphy County road system. It is used for both construction of new roads and maintenance of existing roads.

- 9:5 9:14 **Maintenance of Local Roads**  
A simple understanding of "maintenance" is adherence to established standards.
- 9:15 10:10 **Standards**  
The word "standards" refers to a set of design requirements.
- 10:11 11:4 **Applicability to Gravel Roads**  
The standards contained in **Exhibit 2** apply to gravel roads, provided the gravel road meets the requirements for average daily traffic (ADT) volumes indicated. If the ADT were met, then the design width of the traveled surface, including lane widths and shoulder widths, would fall within those particular requirements. This applies to both gravel, and paved roads.
- 11:5 11:13 **Exhibit 3 - Deposition of Michael Adams**  
**Exhibit 3** consists of Smith's summary of the deposition of Michael Adams.
- 11:14 12:5 **Exhibit 4 - Answers to Interrogatories**  
**Exhibit 4** is a copy of the Ashe County Road Commission's Answers to Plaintiff's Interrogatories and Requests to Produce, dated 2/4/99.
- 12:6 12:15 **Work Performed for Mr. Martin**  
Most of the five previous cases on which Smith has worked for Martin's firm were cases in which Martin represented the plaintiff.
- 12:16 12:25 **Work Performed for Defendants**  
Smith has been retained to work on behalf of a defendant State, County road agency, City, or other governmental body that was responsible for maintaining a street or road, on three occasions in the past two years.

Deposition Continued...

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