



## Transcript of **Terrance Wilson**

Thursday, October 7, 2021

*Kathryn Middleton v. Terrance Wilson*

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IN THE STATE COURT OF DOUGLAS COUNTY

STATE OF GEORGIA

	)	
KATHRYN MIDDLETON,	)	
INDIVIDUALLY AND AS NEXT	)	
FRIEND OF JENNAH MIDDLETON,	)	
A MINOR,	)	
	)	Civil Action No.:
Plaintiff,	)	21SV00226
	)	
v.	)	
	)	
TERRANCE WILSON,	)	
	)	
Defendant.	)	

The DEPOSITION of:  
TERRANCE WILSON  
Being taken pursuant to stipulations herein:  
Before Kathryn Taylor, CCR  
THURSDAY, OCTOBER 7, 2021  
Commencing at 3:35 p.m.

All parties, including the court reporter, appeared by  
videoconference due to the COVID-19 pandemic.

Job No. 107928

## 1 A P P E A R A N C E S

2

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1 I N D E X

2 DEPONENT PAGE

3 TERRANCE WILSON

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8 \* \* \*

9 A T T A C H M E N T S

- 10 Certificate
- 11 Reporter's Disclosure Statement
- 12 Errata Sheet

13 \* \* \*

14 T R A N S C R I P T C O D E S :

- 15 -- interruption/change in thought
- 16 . . . incomplete thought
- 17 [sic] denotes word/phrase that may seem strange
- 18 or incorrect has been written verbatim
- 19 (ph) phonetically spelled
- 20 (indiscernible) not capable of being understood

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1	I N D E X   T O   E X H I B I T S		
2	EXHIBITS	DESCRIPTION	PAGE
3	(No exhibits were identified for the record.)		
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1 P R O C E E D I N G S

2 3:35 p.m.

3 (Witness sworn.)

4 MS. MONSEWICZ: Hey, good afternoon, Mr. Wilson.

5 My name is Caroline Monsewicz, and I'm an attorney

6 representing the Plaintiff in this lawsuit that we're

7 here for today. Before we begin, can I get you to move

8 your screen to where I can actually see you upright

9 instead of down?

10 THE WITNESS: I don't have it down. I'm in a

11 classroom, so I'm walking in a spare room where -- is

12 that better for you?

13 MS. MONSEWICZ: Yes. Thank you very much.

14 Whereupon,

15 TERRANCE WILSON,

16 was called as a witness herein and, having first been duly

17 sworn, was examined and deposed as follows:

18 CROSS-EXAMINATION

19 BY MS. MONSEWICZ:

20 Q. Mr. Wilson, have you ever given a deposition

21 before?

22 A. I've never had to give a deposition before. Oh,

23 with my attorneys, yes, I did.

24 Q. Let me rephrase. Have you -- other than speaking

25 with your attorneys, have you ever given a deposition in a

1 legal proceeding before?

2 A. No.

3 Q. Okay. So I'm going to put some information on the  
4 record. I'll talk about some ground rules, and then we will  
5 begin. Okay?

6 A. All right.

7 MS. MONSEWICZ: This will be the deposition of  
8 Defendant Terrance Wilson, in the case of Kathryn  
9 Middleton, individually and as next friend of Jennah  
10 Middleton, a minor, versus Terrance Wilson. This  
11 deposition is being taken pursuant to notice and  
12 agreement of counsel. It will be taken pursuant to the  
13 Civil Practice Act and for all purposes permitted by the  
14 Act.

15 You've already been sworn in.

16 Bryce, have you guys discussed signature?

17 MR. ASHBY: I think you are on mute, Bryce.

18 MR. MOODY: Sorry about that. Terrance, I'm going  
19 to ask you about signature at the end. Just so you can  
20 start thinking about it, though, you're going to have  
21 two options: You can read over the transcript and sign  
22 it and determine everything was taken down correctly or  
23 make some changes on spelling and things, or you can  
24 waive it. Most people waive it, but we will decide at  
25 the end.

1 THE WITNESS: All right.

2 BY MS. MONSEWICZ:

3 Q. Okay. Mr. Wilson, I'm just going to go over a  
4 couple ground rules, like I mentioned. If you have any  
5 questions, let me know as far as these rules go. My  
6 questions and answers are taken -- are being taken down by a  
7 court reporter right now. So if I'm in the middle of a  
8 question and you begin to respond, please allow me to finish  
9 my question before you answer. Does that make sense?

10 A. Yes. But, again, like, I mean, I still have -- I'm  
11 still in a State-ordered meeting as well for a placement of a  
12 child, but go ahead. I thought I would be able to just kind  
13 of listen and respond from being video recorded for that as  
14 well. Go ahead.

15 Q. Is that going to affect the truthfulness of your  
16 answers here today?

17 A. No. Just -- like, I'm in a State-ordered meeting  
18 for students that are being, you know, put in my classroom  
19 starting tomorrow, so that's also another thing as well. But  
20 go ahead.

21 Q. Okay. When I ask you questions, if you could  
22 respond with a verbal response, yes, no, explanation. Again,  
23 the reason is, is if we need to use the transcript at a later  
24 date, we need to make sure that your testimony is clear.  
25 Does that make sense?



1 A. Yes.

2 Q. If I ask a question and you don't understand what  
3 I'm asking, let me know. I'm happy to rephrase, I'm happy to  
4 repeat it, I'm happy to say it in a different way that does  
5 make sense, but if you answer my question, I'm going to  
6 assume that you understood my question; is that fair?

7 A. Yes.

8 Q. Okay. And if you do need to take a break, let me  
9 know. The only thing I ask is that if I've asked the  
10 question, that you respond before we take a break. Okay?

11 A. Uh-huh.

12 Q. Mr. Wilson, have you taken any medications today?

13 THE COURT REPORTER: He just got knocked off.

14 MS. MONSEWICZ: He did.

15 MR. MOODY: All right. Let me work on it.

16 (Whereupon, a brief technical interruption  
17 occurred.)

18 BY MS. MONSEWICZ:

19 Q. Mr. Wilson, do I need to repeat my last question to  
20 you?

21 A. No.

22 Q. Okay. So can you respond to my last question?

23 A. No.

24 Q. Okay. Mr. Wilson, I am going to ask that you not  
25 look at a computer screen. This is a legal proceeding. I

1 need your attention for this. Okay?

2 (Whereupon, proceedings interrupted by witness.)

3 THE WITNESS: As I mentioned before, I'm at work,  
4 and that's legal as well, so I'm trying to do both. I'm  
5 trying to do both of them at the same time, so let's go.  
6 The State is mandating me to (audio distortion), so  
7 let's go. Let's try to get this wrapped up.

8 BY MS. MONSEWICZ:

9 Q. Mr. Wilson, have you taken any medications today?

10 A. Have I take any medication? No, I haven't. I just  
11 finished work. I have a meeting that I am in. I'm in class  
12 right now. And --

13 Q. So that's a no?

14 A. No.

15 Q. Okay. Have you had any alcohol within the last 24  
16 hours?

17 A. No.

18 Q. Okay. Have you taken any type of substance in the  
19 last 24 hours?

20 A. Nope.

21 Q. Are you sick at all today?

22 A. Am I sick?

23 Q. Yes. That's what I asked.

24 A. Okay. If I -- I didn't understand what you're  
25 saying. No, I'm not sick.

1 Q. And you're not currently under a doctor's care for  
2 any illness?

3 A. I have a critical illness, but that has nothing to  
4 do with this.

5 Q. Okay. So there's no reason you can think of at all  
6 as to why you would not be able to answer my questions fully  
7 and accurately?

8 A. Right.

9 Q. Okay. Do you recall the date of the collision that  
10 we're here for today?

11 A. No. I remember it was sometime in the winter.  
12 It's been -- it's been a while ago at the -- maybe a couple  
13 days before the holiday, or after.

14 Q. Okay. So if I said January 26, 2020, would you  
15 have any opinion about that date?

16 A. That's about right. I know it was afterwards  
17 because I was doing some shopping.

18 Q. Okay. Did you prepare for today's deposition  
19 today?

20 A. Did I prepare? No.

21 Q. You didn't speak with your attorneys?

22 A. I spoke to them about scheduling. I was trying to  
23 tell them I had, you know, class duties that I was dealing  
24 with, but that's -- for what you consider preparing, no.

25 Q. Did you review any documents in preparation?

1 A. Nope.

2 Q. As we sit here today, do you believe you're at  
3 fault for causing this collision?

4 A. Do I believe I'm at fault? I was crossing the  
5 parking lot, but not what she's saying, no.

6 Q. So is that a no?

7 A. I was at fault for -- yeah, going across the  
8 parking lot, yes, but...

9 Q. So my question is: Do you believe you're at fault  
10 for causing the collision? Is that a no?

11 A. Yes.

12 Q. To clarify, you're saying you do not believe you  
13 were at fault for causing the collision, correct?

14 MR. MOODY: No, no. I object -- he said yes.

15 THE WITNESS: I said yes. Jesus.

16 MR. MOODY: Yeah. He said yes, that he is at fault  
17 for the collision.

18 BY MS. MONSEWICZ:

19 Q. And that's what I'm trying to clarify because it's  
20 not clear.

21 A. Excuse me, ma'am. Are you okay? Like, what --  
22 like, I'm confused.

23 Q. Okay.

24 A. Like, you act -- like, I'm getting berated by --  
25 like, come on, man.

1 MR. MOODY: Yeah. Let's go off the record real  
2 quick.

3 (Whereupon, a brief discussion occurred off the  
4 record.)

5 BY MS. MONSEWICZ:

6 Q. Let's start again and go back on the record and we  
7 will continue. Okay?

8 A. Just know you have been -- since I've been talking  
9 to you, I just don't feel welcomed by you at all. I feel  
10 like I -- just like the entire time I've spoken -- been  
11 speaking to you, I feel like that. I don't feel safe talking  
12 to you. I feel like, you know, like, it's -- and I'm just  
13 shocked that this is the person that's supposed to be talking  
14 to me about this in this time frame. But I definitely feel  
15 that there is some animosity and stuff from -- yeah, I do  
16 feel that from you, but we can continue. Let's go.

17 MR. MOODY: Let's go back on.

18 MS. MONSEWICZ: Yeah. We're back on the record.

19 BY MS. MONSEWICZ:

20 Q. Mr. Wilson, do you know if my client was hurt  
21 because of this crash?

22 A. No. I do not know if she was hurt, no. Because  
23 she was -- no.

24 Q. Did you ever exchange contact information with her?

25 A. No. I called the police, and I made sure that we

1 had -- like, as far as insurance information, she just pretty  
2 much got out the car, she said, Why did you hit me?

3 No, but I didn't get -- I think the police involved  
4 [sic] that information from us, but I'm the one that called  
5 the police.

6 Q. Did you apologize to my client at all?

7 A. Did I apologize to her?

8 Q. Yes, sir. That's my question.

9 A. No. I didn't apologize to her.

10 Q. Okay. Do you know why we are here today?

11 A. We are here from a parking lot accident to where I  
12 was crossing over to another parking space and someone was  
13 speeding down the -- the parking way, and then they hit me.  
14 Since I was coming across, you know, I -- you know, on the --  
15 you know, on the right-of-way thing. That's what it's about.

16 Q. Are you aware that you're being sued by my client  
17 for damages from this collision?

18 A. I heard about that, yes.

19 Q. Okay. Do you know her name?

20 A. You said Kathryn or something. I've never even  
21 spoken to the lady.

22 Q. Can I get your date of birth, please?

23 A. 2/21/79.

24 Q. Are you currently married?

25 A. I just got married.

1 Q. Congratulations.

2 A. Thank you.

3 Q. Can you give me your spouse's name?

4 A. No. Because that has nothing to do with this.

5 Q. Okay. Please tell me what your spouse's name is.

6 A. Why do I have to do that? I just got married.

7 MR. MOODY: So the reason -- so the reason she  
8 wants to know who your wife is, is just in case she gets  
9 put on the --

10 THE WITNESS: I'm not married to a woman.

11 MS. MONSEWICZ: He said spouse.

12 MR. MOODY: Okay.

13 THE WITNESS: Okay. So I get that, but what I'm  
14 saying is -- is I just got married. But B. Weaver.

15 I got to go and check and make sure they're okay in  
16 this meeting.

17 MS. MONSEWICZ: Matt, do you want to go ahead and  
18 ask your questions?

19 MR. ASHBY: I can certainly do that. Whatever you  
20 want.

21 MS. MONSEWICZ: Yeah. I'm going to let you go  
22 ahead and ask, because I don't know how long this is  
23 going to take.

24 MR. ASHBY: Okay.

25 (Whereupon, proceedings interrupted by witness.)

1 MR. ASHBY: You're done with that meeting, and you  
2 are good?

3 THE WITNESS: They let me sit off to the side and  
4 the screen is muted. So I still have to be -- be in  
5 here, but they're working around me so I can get this  
6 done. But I'm ready. Go ahead.

7 MS. MONSEWICZ: So as he discussed really quickly,  
8 we're going to let Matt go ahead and ask his questions.

9 MR. MOODY: All right. So this guy is about to ask  
10 you some questions as the attorney for the Plaintiff's  
11 insurance carrier, USAA, but he is a Defendant as well,  
12 so...

13 CROSS-EXAMINATION

14 BY MR. ASHBY:

15 Q. Mr. Wilson, my name is Matt Ashby. I just have a  
16 few questions. I apologize for going out of turn, but I have  
17 to leave at about 4:30. I just have a handful of questions  
18 for you.

19 My understanding is that at the time of this  
20 accident back on January the 26th of 2020, you were living  
21 with your mother, Gail, and your niece, Breyonna Wilson; is  
22 that correct?

23 A. Yes.

24 Q. Okay. And what was the address where you were  
25 living at the time of this accident?



1 A. 5345 Brickleberry Way, Douglasville, Georgia 30134.

2 Q. Okay. And were you living with anybody other than  
3 your mother, Gail Wilson, and your niece, Breyonna?

4 A. I was staying back and forth with my then fiancé.

5 Q. And that -- is that Ms. -- I think it was D.  
6 Weaver; is that correct?

7 Q. I said B -- B.

8 Q. B. Weaver, okay. And is it spelled B-e-e?

9 A. No that's the first -- Brennon.

10 Q. How do you spell her first name? I'm sorry.

11 A. Brennon, B-r-e-n-n-o-n. And, again, it's a man.  
12 It's not a female.

13 Q. I'm sorry. I apologize. I apologize. Okay.

14 Did your mother own -- did your mother or Breyonna  
15 own any vehicles at the time of this accident?

16 A. My mother owns her own. I don't know my niece --  
17 that's my niece's car. My mother owned her cars.

18 Q. Okay. Do you know what -- how many vehicles your  
19 mother owned back at the time of this accident?

20 A. She had her car, my niece's car that she paid for,  
21 three. Two to three -- two. And then, like, an old -- older  
22 -- when that was -- that's not even in operation anymore.

23 Q. Okay. So --

24 A. Yeah.

25 Q. And there is a method to the madness. Okay? As

1 was indicated earlier, I represent USAA, which is  
2 Ms. Middleton's insurance company, and I'm just trying to  
3 determine if there may be --

4 (Whereupon, proceedings interrupted by witness.)

5 BY MR. ASHBY:

6 Q. -- if there may be some additional liability  
7 insurance coverage that might provide you coverage for this  
8 lawsuit. And that's why I'm asking you these questions. A  
9 lot of these questions that the -- myself and the other  
10 attorneys may ask you may seem odd and out of place, but  
11 there is definitely a method to -- and a reason for these  
12 questions.

13 So there was a list of automobiles that were  
14 identified on an Allstate insurance policy. There was a 2016  
15 Kia Optima. Are you familiar with that vehicle?

16 A. That's my car.

17 Q. That's your car. Okay. Did you own that vehicle?

18 A. Well, I'm buying it.

19 Q. Okay. I'm talking about back at the time of this  
20 accident, January the 26th of 2020 --

21 A. Yes.

22 Q. -- who owned that 2016 Kia Optima?

23 A. We both -- we both owned it, yes. Me, me.

24 Q. You and your niece?

25 A. Me and my mother.

1 Q. Okay. Okay. And that vehicle was insured through  
2 Allstate?

3 A. Yes.

4 Q. Okay. And then there was a 2014 Nissan Altima?

5 A. That's my mother's car.

6 Q. And was that also, to your knowledge, insured by  
7 Allstate?

8 A. Yes. Yes, sir.

9 Q. Okay. And there was a 2008 Nissan Sentra. Who  
10 owned the vehicle?

11 A. That's my niece's car. That's my niece's car.

12 Q. Okay. And do you know who insured that vehicle?

13 A. All of them were insured with Allstate. That's my  
14 niece's vehicle. She has that in college. I have my car, my  
15 mother had her car. At the time, yeah, our car was in the  
16 shop.

17 Q. The Kia was in the shop?

18 A. Yep.

19 Q. Okay. And there was a 2000 Dodge truck. Do you  
20 know who owned that?

21 A. That's my brother's truck.

22 Q. Okay. Do you know who insured that vehicle?

23 A. No. I'm not for sure, but I know that's my  
24 brother's truck.

25 Q. And your brother's name?

1 A. Darryl Wilson.

2 Q. Okay. And was he living with your mom and Breyonna  
3 and you at any point in time back in January of 2020?

4 A. Yeah. He wasn't living there in January 2020, no.

5 Q. He was not living there?

6 A. Nope.

7 Q. He was or he was not?

8 A. In 2020? No, I mean, like, he wasn't living there.  
9 You know what I mean? His daughter stay there, but he wasn't  
10 living there, no.

11 Q. And his daughter, I'm assuming, is Breyonna?

12 A. Yes.

13 Q. Okay. And then there was a 1995 Nissan Sentra?

14 A. Oh, that was my auntie's old car.

15 Q. Is that the one that you were referencing that does  
16 not work?

17 A. Yep.

18 Q. And --

19 A. I don't even think they have it no more.

20 Q. Was your aunt living at the time of this accident?

21 A. Was she what? Living? Yeah, she was living.

22 Q. Okay. Well, I don't know. Mr. -- I'm not trying  
23 to be combative, Mr. Wilson. I'm asking --

24 A. No, no, no.

25 Q. -- questions.

1 A. You said, is she living with us? Living?

2 Q. Yeah. I just want to know --

3 A. I mean, yeah.

4 Q. I just want to know, was she living at the time of  
5 the subject accident?

6 A. Yeah.

7 Q. Here's the thing. Listen, I'm not trying to be  
8 combative. I'm going to tell you, you are being sued in this  
9 case and you have, through Allstate insurance, \$100,000 in  
10 insurance coverage.

11 A. Uh-huh.

12 Q. If there's a verdict in this case that's in excess  
13 of that, my client has to pay for it, and my client will have  
14 a subrogation right -- a subrogation claim against you. So  
15 I'm just trying to determine whether or not there may be  
16 additional insurance coverage that provides --

17 A. I don't know about -- I don't know about that car.  
18 All I'm saying, that car is not even operable anymore. I  
19 know -- I didn't know that car was on my mother's insurance,  
20 so, I mean, you're asking me a question about that I didn't  
21 know. Okay? So when you're saying "living" I'm not -- I'm  
22 confused about what you're saying.

23 Q. You said it was your auntie's car --

24 A. Yes.

25 Q. -- and I simply asked you if she was living --

1 A. Yeah. And I --

2 Q. -- at the time of this accident.

3 A. And I said "living"?

4 Q. Yes, living.

5 A. And then you basically went into what -- yeah. So  
6 I questioned, like, living. And I -- and that's something  
7 that -- living? Like, was she living at this time? Like,  
8 come on, man.

9 Q. Was she living on January the 26th of 2020? Yes or  
10 no?

11 A. And she's -- and she's still alive today.

12 Q. And your aunt's name, please?

13 A. Toni Wilson. Boy, this is -- wow. This must be  
14 from --

15 Q. Was Ms. -- was your aunt living with you and your  
16 mom at the --

17 A. No.

18 Q. -- Brickleberry Way address at any point in time in  
19 January of 2020?

20 A. No, sir.

21 Q. Okay. All right. Did you own any other vehicles  
22 other than --

23 A. Nope.

24 Q. -- the 2016 --

25 A. No.

1 Q. -- Kia Optima?

2 A. No, sir.

3 Q. All right. And other than you, your mother, Gail,  
4 your niece, Breyonna, was anybody else living at the  
5 Brickleberry Way address back in January of 2020?

6 A. No. My stepfather would be in out, but that's not  
7 living there. So, no.

8 Q. And what is your stepfather's name?

9 A. My stepfather's name?

10 Q. Yes.

11 A. They're not even married, so...

12 I said he would be by there, so, I mean -- oh, his  
13 name is John Frazier (ph).

14 Q. Did he ever spend the night at the house?

15 A. Not while I was there.

16 Q. Okay. Did he keep any personal items at the house?

17 A. Not while I was there.

18 Q. Did he own a vehicle back in 2020?

19 A. Does he own a vehicle back in 2020?

20 Q. Did he own a vehicle back on January the 26th of  
21 2020, to your knowledge?

22 A. I think a Honda Accord, but I wouldn't know  
23 anything about his car. He drives a Honda Accord.

24 Q. Do you happen to know who insured that vehicle?

25 A. No, sir. I wouldn't know all of -- any of that.

1 Q. All right. I don't believe I have anything further  
2 at this time. I appreciate your time.

3 A. Thank you.

4 RE CROSS-EXAMINATION

5 BY MS. MONSEWICZ:

6 Q. All right. Mr. Wilson, I'm going to keep asking  
7 you a couple more questions regarding this.

8 Now, the Brickleberry Way, address, do you still  
9 currently live at that address?

10 A. Currently, no.

11 Q. Where do you currently live?

12 A. 1770 -- 1770 Graywood Drive.

13 Q. Did you say Berrywood?

14 A. Graywood.

15 Q. And where is that Graywood Drive address located  
16 town-wise?

17 A. It's, like, in Mableton, Georgia.

18 Q. Can you give me the ZIP for that, please?

19 A. 30126.

20 Q. So does that mean you're currently living in Cobb  
21 County?

22 A. Yes.

23 Q. Okay. Does your mother still live in Douglas  
24 County?

25 A. Yes.



1 Q. Other than your mother -- other than your mother,  
2 who relative-wise lives in Douglas County?

3 A. My niece, and when she's not in college.

4 Q. Is that Breyonna?

5 A. Yes.

6 Q. Okay. Other than your mother and Breyonna, any  
7 other relatives that live in Douglas County?

8 A. My brother lives in Hiram. I don't know if that's  
9 still Douglas. I mean, not Hiram, but Paulding County.

10 Q. Okay. Okay. Did you go to church anywhere in  
11 Douglas County or go to any type of religious --

12 A. No.

13 Q. -- organization?

14 A. No, no, no.

15 Q. Are you a member of any civic organizations in  
16 Douglas County?

17 A. Nope. Nothing in Douglas County. I ain't part of  
18 none of that.

19 Q. Are you a member of a gym in Douglas County?

20 A. Nope.

21 Q. What do you like to do in your free time?

22 A. I like to teach, work with -- do philanthropy work,  
23 play sports.

24 Q. What kind of sports?

25 A. Olympic sports.

1 Q. Can you elaborate, please?

2 A. That's swimming, diving, you know, you got -- you  
3 got racquetball, you got track, you got basketball, you got a  
4 whole bunch of them.

5 Q. Mr. Wilson, I think it's safe to assume you have a  
6 college education, right?

7 A. Yes, ma'am. I have three degrees.

8 Q. Okay. What's your first degree in?

9 A. African American studies, history.

10 Q. And where did you receive that degree?

11 A. Morehouse.

12 Q. All right. The second degree?

13 A. I have an MBA in project management.

14 Q. Did you say project management?

15 A. Yeah. I said an MBA in project management. That  
16 was from University of Phoenix.

17 Q. And the last degree?

18 A. I have an MS in leadership.

19 Q. And where did you receive that?

20 A. Strayer.

21 Q. When did you last receive that leadership degree?

22 A. It had to be in 2013. I was finishing here when I  
23 got my first master's so, that's about a year and a half  
24 after.

25 Q. Okay. Do you have a certification to teach?

1 A. Yes.

2 Q. What grades or what levels do you teach?

3 A. Pre-K through 12, special ed. I'm in there. Right  
4 now, excuse me, I'm a supply teacher right now. I'm not  
5 certified yet. I left, you know, before to get a dual  
6 teacher certificate, so I'm actually finishing that process  
7 now. So pretty much yes, you know what I'm saying? But I'm  
8 actually, you know, at a higher position to where I'm  
9 basically going to have dual teaching certificates in  
10 different states.

11 Q. Okay. And I'm not trying to be rude when I asked  
12 this, but right now, today, you don't have a teaching  
13 certificate, right? But you're --

14 A. Right now, today, I have a certification as far as  
15 -- that's consultative, but what -- you know, as far as for  
16 me, what I'm waiting on is just my paperwork to come in. So  
17 it's just a technicality. So consultative now, which is why  
18 I'm supplying now.

19 Q. And you said dual certificates?

20 A. Dual teaching certificate. Meaning, you can teach  
21 in multiple states.

22 Q. I understand. What other states would you be  
23 teaching --

24 A. Florida. Florida?

25 Q. Well, I'm going to complete my question for the

1 record. What other states would you be permitted to teach in  
2 with this degree or certificate?

3 A. Florida.

4 Q. How long have you been teaching?

5 A. About 9 1/2 -- 9 1/2, 10 years before the pandemic.

6 Q. Are you currently with Marietta City Schools?

7 A. Uh-huh.

8 Q. Is that a yes?

9 A. Yes.

10 Q. And where were you before Marietta City Schools?

11 A. Cobb.

12 Q. When did you leave Cobb?

13 A. 2007 -- 2019. December 2019.

14 Q. Any particular reason you left Cobb County?

15 A. The dual teaching certificate that I just told you  
16 about.

17 Q. Okay. It's -- other than the action that we're  
18 here for today, Mr. Wilson, have you ever been a party to a  
19 lawsuit before?

20 A. No.

21 Q. Okay.

22 A. What do you mean -- hold on. Let me think back.  
23 So I was involved, like, in a real car accident when I was,  
24 like, running for the USA team, preparing for the 2000  
25 Olympics, and I got hit by an 18-wheeler. And that time, I

1 was involved in a car accident.

2 Q. Did you file the suit or did someone file a suit  
3 against you?

4 A. No, I thought -- I was hit by an 18-wheeler, ma'am.  
5 I was the one that basically filed the suit.

6 Q. Okay. Thank you.

7 A. And, like, it was settled out of court -- out of  
8 court, yeah. Basically, an 18-wheeler hit me and I was -- I  
9 had to be 19, 20.

10 Q. And how many years ago was that?

11 A. That was 2000, so that was over 19 or 20 years ago.

12 Q. And did you retain counsel for that lawsuit?

13 A. Yeah. Retained counsel, but they ended up filing  
14 some paperwork late, and they had to just -- you know what  
15 I'm saying? They -- it was some formality. Yeah. I don't  
16 remember their name. I can't give you none of that.

17 Q. Okay. Mr. Wilson, do you have any type of excess  
18 liability insurance policy, like --

19 A. Nope.

20 Q. -- an umbrella policy?

21 A. Nope.

22 Q. Okay.

23 A. Like I said, I've been out of work for over a year  
24 and a half. I'm just supply teaching right now. Just  
25 started, what, a couple of weeks ago.

1 Q. Okay. You mentioned that -- earlier with  
2 Mr. Ashby's questions that your Kia Optima, at the time of  
3 the collision, was in the shop; is that correct?

4 A. Yes, it was.

5 Q. What was it in the shop for?

6 A. Some lady had hit me on the highway.

7 Q. Okay. When you say "a lady hit you on the  
8 highway," were you rear-ended?

9 A. Yes, I was rear-ended.

10 Q. Where were you rear-ended?

11 A. I-20.

12 Q. I-20 towards Douglasville or closer --

13 A. No. In the city. Like, I was -- it had to be,  
14 like, downtown, like, Moreland. Something like that.

15 Q. Did you make a claim for any personal injuries as a  
16 result of that rear-end accident?

17 A. No. I just wanted my car fixed.

18 Q. Okay. When exactly did that accident occur?

19 A. It happened, like, a week or two before, like, your  
20 accident. The accident with your claim.

21 Q. Okay. Moving on, do you recall about what time the  
22 accident happened in January of 2020?

23 A. It had to be early afternoon. I don't know. I was  
24 going to, like, the store to pick something up, so it had to  
25 be in the daytime. Maybe between 12:00 to 3:00. Something

1 like that.

2 Q. Okay. And you were over off of Jimmy Lee Parkway  
3 in Hiram?

4 A. Like I said, yeah, I don't really know that --  
5 frequent the area too much. I was just trying to stop by the  
6 store. I can't tell you exactly what street it is because I  
7 don't try to be out in that area too often by myself. It's  
8 kind of dangerous out there.

9 Q. How often before January 26, 2020, had you driven  
10 your mother's vehicle before?

11 A. Just a situation to where I may have needed it.  
12 You know what I'm saying? Or to run an errand or so. But, I  
13 mean, like I said, the situation happened in my car to where  
14 somebody hit me, so I needed to use the car for that day.

15 Q. So more than 20 times?

16 A. No. I ain't never used my mom's car more than 20  
17 times. That's crazy. More like five to six. 20 times?  
18 That's ridiculous.

19 Q. Were your headlights on at the time?

20 A. It was daytime, ma'am. I mean, they're auto, so  
21 that's -- they're on, but it -- I didn't turn them or  
22 something. It was the daytime.

23 Q. Okay. You did not turn them on, correct?

24 A. No.

25 Q. Okay. Where were you coming from?

1           A.    I was in a parking space, and I had already pulled  
2    in the parking space.  I basically -- I looked to the left,  
3    looked to the right, and I started just to inch on over to a  
4    closer parking space that was right over there, and that's  
5    when the lady was speeding on the drive thing and hit me.  
6    But I guess -- like I said, I was out crossing over, so it  
7    was my fault, but that's what happened.

8           Q.    And to clarify, you were in several parking spaces  
9    when the point of impact occurred?

10          A.    Repeat what you said.  Because I don't want to get  
11    -- you said I was what?

12          Q.    Your vehicle was in between several parking spaces  
13    when it was --

14          A.    No, not several.  It was part -- you pull into a  
15    parking space, and then I'm like, Oh, it's another space over  
16    there closer to the store.

17                I got to -- you know, I looked to the left, looked  
18    to the right, and I started to inch on over just to pull  
19    right into the next spot that's in front of me.  And that's  
20    when the lady was, you know -- you know, speeding down the  
21    little driveway thing, and that's when the impact happened.

22          Q.    To be clear, you weren't in a designated driving  
23    lane, correct?

24          A.    No.  I was in a parking space.  Because, you know,  
25    I had already pulled into the parking space.  So basically,



1 when I seen, Oh, it's another parking -- and it wasn't so  
2 many cars around my car, so nobody will open a car and hit my  
3 mother's door or anything. So I was just going to pull into  
4 the next space right -- I was -- you have the parking space,  
5 you have your lane, the next parking space. I was just  
6 trying to get to the next parking space.

7 As I was doing that, trying to inch out, thinking I  
8 was good after looking to the left and right, that's when --  
9 you know what I'm saying? The car was -- and I couldn't  
10 basically back up fast enough, and that's when -- that's when  
11 the impact happened.

12 Q. Did you put your foot on the brake before impact?

13 A. Did I put my -- I was backing. Trying to back up,  
14 so I was in -- I was trying to reverse.

15 Q. So when your vehicles made contact, your vehicle  
16 was in reverse?

17 A. Yes. I was trying to basically back up because I  
18 was coming out and, like, she was speeding down the little --  
19 like the little, short end of the parkway. And I'll just  
20 never -- never forget her just -- because I'm thinking she's  
21 going to stop. Like, I kind of got stuck for a minute. You  
22 know what I'm saying? But I definitely was trying to back  
23 up. I wasn't on the brake nothing like that. I was trying  
24 to back up after seeing the car coming.

25 Q. Were you on your cell phone at the time of the

1 impact?

2 A. Repeat that.

3 Q. Were you on your cell phone at the time the two  
4 vehicles collided?

5 A. No, no, no, no. I didn't get on my cell phone  
6 until I called the police. You know what I'm saying? When,  
7 you know, the impact happened.

8 Q. Did your airbags deploy upon impact?

9 A. No, no. No airbags deployed.

10 Q. Walk me through what happened when your vehicle  
11 collided with hers.

12 A. Okay. My vehicle collided with hers. She gets out  
13 of the car, and, mind you, like, Hey. I'm like, Did you not  
14 see me pulling out? She was like, (descriptive sound).

15 So she called somebody on the phone. I called the  
16 police. I called my mother after I called the police, and  
17 then afterward, I'd say about 30 minutes or something, she  
18 got -- she gets out, she's sitting there, she calls some --  
19 some white gentleman comes up.

20 I guess he must have been her husband. He comes  
21 there yelling at her because I guess he found out that she  
22 was outside the car. The girl is outside the car or  
23 whatever, so he told the girl -- the little girl -- I guess  
24 the 12-year-old girl to, you know, go get in the truck.

25 So she jumps in the truck and then he's, you know,

1 steady talking to I guess his wife or whatever.  
2 And so I didn't speak to him at all. You know what I'm  
3 saying? I know the officer was kind of -- you know, kind of  
4 like the situation I had with you, you know. It was that  
5 type of situation.

6 So I didn't feel comfortable. I backed off and I  
7 said, You know what? I called my mother and I was just like,  
8 Hey, this is going on and we just, you know -- I'm the one  
9 who called the police, but I feel, you know, a certain type  
10 of way just as far as the conversation and kind of how they  
11 just addressed me.

12 So I got back in the car and I was quiet until he  
13 said we could go. He said he wasn't given out any tickets or  
14 anything of that nature. He said, you know -- he just wrote  
15 it up and that's what we had.

16 Q. Okay.

17 A. I go -- hold on. I go into the store, because I  
18 went ahead and went into the store because, you know, nobody  
19 said anything about, you know, was there any injuries or  
20 anything like that. I end up -- I go to another store, which  
21 is right next to the store I'm going to, and I just come back  
22 out about 35 minutes later. They are moved over to way --  
23 another different spot, still sitting out in the parking lot  
24 for like 45 minutes talking. You know what I'm saying? Your  
25 client and her husband.

1           They had even moved to a whole different part of  
2 the -- in the shopping plaza and were just out there for like  
3 45 minutes. So I'm like, Okay. So I didn't -- you know,  
4 know what was going on with that, but that's pretty much what  
5 happened with the incident.

6           Q. Okay. So is it your testimony that the vehicles  
7 were moved to a different spot by the time the police  
8 arrived?

9           A. No, no, no, no. What I said -- we already had  
10 that. The police had left, everything. No ambulance was  
11 called, nobody had to go to the hospital, no injuries were  
12 observed. I went ahead and went to the store after that.  
13 Your client and her husband or so, whatever, sat out in that  
14 parking lot for another additional 45 minutes or close to an  
15 hour. You know what I'm saying? In a different location in  
16 the parking lot. Do you see what I'm saying?

17          Q. I do now.

18          A. They moved their car over and were just sitting out  
19 there talking for, like, an extra 45 minutes.

20          Q. Okay. You didn't hear anything that they were  
21 saying to each other at that time?

22          A. No. I mean, all I know was they basically moved  
23 from where the impact happened after the police left, and  
24 went way over -- you know, went to another location, you  
25 know, in the parking lot and were just sitting out there

1 talking.

2 Q. Okay. Between --

3 A. Outside of the vehicle and all that type stuff, so  
4 yeah.

5 Q. Between when you called the police and when they  
6 arrived, how much time had passed?

7 A. Probably, like, less than 15 -- less than 15  
8 minutes. They got there pretty quick.

9 Q. Did the police talk with you first or did they talk  
10 with her first?

11 A. I'm the one that called. And when they came, they  
12 kind of pretty much was talking to us both. I think, you  
13 know, they actually -- you know, we had an accident, and I  
14 told them I called, let them know what happened, and then she  
15 told her story, I believe. And then he ended up, you know,  
16 talking to us both.

17 Q. All right. So he didn't separate you at any point?

18 A. I mean, he talked -- you know, like, I guess you  
19 would call that separation where he was talking to me in my  
20 car. Her car is right there. I can look right at them and  
21 see what he's talking about, you know what I'm saying? So I  
22 wouldn't call that a separation.

23 Q. Okay. Did you overhear anything that Ms. Middleton  
24 said to the police officer?

25 A. Did I overhear?

1 Q. Yes.

2 A. I overheard her. Like, I told him basically what I  
3 just told you, and she was saying that basically I came out -  
4 - you know what I'm saying -- you know, and hit her. Like,  
5 you know what I'm saying? I was letting him know, she's  
6 speeding coming down the driveway of the parking lot.  
7 There's no way she should have been going that fast, and  
8 then, you know, that's what was just -- and like he said, he  
9 couldn't tell us who was at fault at that time. You know  
10 what I'm saying? He could just only go by basically what we  
11 were saying. So I know he did say that. He said, you know,  
12 nobody was getting any tickets.

13 Q. And do you know if this parking lot is private  
14 property?

15 A. Yes. Because I asked them to pull the video of  
16 them sitting out there for all that time, and all that stuff,  
17 yes, yes.

18 Q. Okay.

19 A. Yes. Hey, listen, I've got to go in the meeting  
20 for one second. Can you hold for one second? They need me  
21 for one second.

22 Q. Sure.

23 A. Thank you.

24 MS. MONSEWICZ: We'll take a quick five-minute  
25 break. We are off the record.

1 (Whereupon, a brief break was taken.)

2 BY MS. MONSEWICZ:

3 Q. Mr. Wilson, did you receive any citation as a  
4 result of this collision?

5 A. No, no.

6 Q. Okay. Have you spoken to anyone about this  
7 collision?

8 A. My mom.

9 Q. Other than your mom and your attorney.

10 A. And the lawyer.

11 Q. Okay.

12 A. No. There really wasn't nothing -- no. It wasn't  
13 even that big.

14 Q. Are you aware of any eyewitnesses --

15 (Whereupon, proceedings interrupted by witness.)

16 THE WITNESS: No. go ahead. No, I'm not.

17 BY MS. MONSEWICZ:

18 Q. Mr. Wilson, please don't be offended. I ask every,  
19 single person this. Have you ever been arrested or convicted  
20 or charged with any criminal offense?

21 A. No.

22 Q. Okay. No DUI?

23 THE COURT REPORTER: He's going to have to sit down  
24 because he is freezing up. It's making his bandwidth  
25 really low.

1           THE WITNESS: Hello. I'm having a meeting at  
2           school. But, no. I've never been arrested, never been  
3           -- had a DUI, none of that. Never been in trouble  
4           before.

5 BY MS. MONSEWICZ:

6           Q. All right. Mr. Wilson, are you in a good spot to  
7           sit down for a moment? Whenever you move, it's really  
8           difficult to understand you. I'm not trying to be rude.  
9           We're just trying to make this legal proceeding just  
10          possible.

11          A. All right. I'm back in my classroom now, so let's  
12          go.

13          Q. Thank you. Have you ever received any type --

14          A. No.

15          Q. -- of traffic citation before.

16          A. A ticket? Like a speeding ticket?

17          Q. Yes, sir.

18          A. I've got a speeding ticket before.

19          Q. When did you receive a speeding ticket?

20          A. I can't -- I can't even tell you. It's been so  
21          long. I can't even tell you.

22          Q. More than ten years?

23          A. Yeah. Maybe about seven.

24          Q. Was that here in Georgia?

25          A. Yeah, yeah.



1 Q. 24 hours before the collision occurred, did you  
2 have any type of medication, any over-the-counter or  
3 prescription, in your system?

4 A. Nah. Nope. Just my -- I would say yes. I take  
5 certain medications for my critical illness, but that's --  
6 that's it. But it's nothing that impairs who I am -- 24  
7 hours. But I know I hadn't taken it that day.

8 Q. You did not have any medication that day for 24  
9 hours?

10 A. I usually take it at nighttime, so that happened in  
11 the daytime. I make sure I take it at nighttime just so I  
12 won't have issue with my appetite or anything like that.

13 Q. Did you take it the night before the collision?

14 A. The night before? I would say I had to take it  
15 that day before. I take it every day, but it wasn't -- yeah.

16 Q. Can you tell me the name of that medication,  
17 please?

18 A. BIKTARVY.

19 Q. Can you spell that for me, please?

20 A. BIK -- B-I-K-T-A-R-V-Y.

21 Q. All right. Other than BIKTARVY -- and let me ask:  
22 Do you know the milligrams dosage of BIKTARVY that you take?

23 A. No, I don't.

24 Q. Okay. And the night before or the day before, had  
25 you had any alcohol to drink?

1 A. No. I never drink liquor.

2 Q. Okay. And I'm talking about wine? Beer? Any type  
3 of alcohol.

4 A. No, no.

5 Q. Okay. Mr. Wilson, what do you contend the  
6 Plaintiff did wrong to cause this accident?

7 A. What do -- what do I -- you said what do I contend  
8 she did wrong?

9 Q. Yes, sir.

10 A. I didn't necessarily said she did anything wrong.  
11 I said she was speeding coming down the -- you know, the --  
12 the driveway as far as in the parking lot. I mean, like I  
13 realize that, hey, it was my -- my fault for crossing over  
14 the parking lot, but she definitely was speeding. She was  
15 speeding.

16 Q. Now --

17 A. I don't know how fast she was speeding. Seeing the  
18 little girl in the car with her, that's all I can remember,  
19 like, seeing it speeding down the thing. So that's all I can  
20 remember. You know what I'm saying? I can't tell you  
21 outside of just speeding that fast in a parking lot, to where  
22 it could have been kids or anything like that coming out.  
23 And it's right not too far from where the store doors were.  
24 I would just say that.

25 Q. Mr. Wilson, my question is a little bit more

1 nuanced that I'm about to ask you. So do you contend that  
2 the Plaintiff in any way contributed to or caused this  
3 accident?

4 A. Oh, yes, speeding. Yes, definitely. She should --  
5 I mean, but as far as -- it's my fault, but she was speeding  
6 coming down the parking lot.

7 Q. When you say she was speeding, did you have any  
8 type of device to measure her speed?

9 A. No. Just as far as -- out of all the years I've  
10 been driving, and I know in a parking lot where you basically  
11 shouldn't be going fast, like she was driving on the street  
12 in a parking lot, if that makes any sense.

13 Q. Do you have any specialized medical knowledge?

14 A. Specialized medical knowledge about -- I mean, have  
15 I been to school to know anything about -- what do you --  
16 Explain that, because I don't know where that --

17 Q. Let me rephrase. Do you have any formal education  
18 with medical knowledge or medical assistance?

19 A. Formal etiquette, no. I'm more on the business  
20 side. I've dealt with it in the schools as far as just --  
21 no. But I think what you're asking is a little different, so  
22 I would say no.

23 Q. Okay. And do you have any type of expertise or  
24 experience with any accident reconstruction?

25 A. No. Nope. Nope.

1 Q. Other than your belief -- your knowledge of driving  
2 over the past several years, you don't have any facts or  
3 evidence to show where Ms. Middleton was speeding, correct.

4 A. Yeah. She was speeding. You told me if I had a  
5 radar, but I know -- I know for a fact if it was me and I was  
6 on the street and somebody were to see me, they would have  
7 stopped me for speeding that fast. You know when you have --  
8 you would be in your neighborhood and you guys put up  
9 "There's children here," you shouldn't be driving that fast  
10 in your neighborhood.

11 Like, she was one of those people driving that fast  
12 in a parking lot. I know that because I'm not -- you know  
13 what I mean? I'm a very -- I'm a highly intelligent human.  
14 I mean, I know how fast I should be going inside of a parking  
15 lot. We've all taken driver tests before, so it's not a  
16 specialty that you need to know and understand. It's common  
17 sense.

18 Q. Thank you, Mr. Wilson.

19 A. If it was me, I would have been arrested or locked  
20 up for something if I was going that fast in a parking lot.

21 Q. Thank you, Mr. Wilson. And I understand you're a  
22 very smart guy. I'm not saying anything like that. My  
23 question, though, is other than your own perception and  
24 knowledge, do you have anything else to show that she was  
25 speeding?

1 A. No, no.

2 Q. Okay. All right. I don't have anything further.

3 MR. ASHBY: Nothing further.

4 THE COURT REPORTER: Are you going to be ordering  
5 the transcript, Mr. Moody?

6 MR. MOODY: Yeah, I am.

7 MS. MONSEWICZ: I will be ordering as well. Thank  
8 you.

9 THE COURT REPORTER: Mr. Ashby, did you want to  
10 order as well?

11 MR. ASHBY: Yeah. If I can get an e-tran with a  
12 word index, I'd appreciate it.

13 \* \* \*

14 (Whereupon, the deposition ended at 4:28 p.m.)

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16 Signature reserved.

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## D I S C L O S U R E

STATE OF GEORGIA Deposition of TERRANCE WILSON

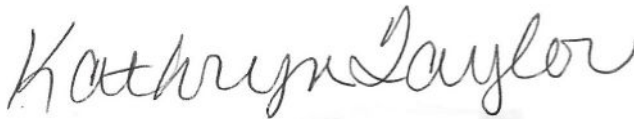
COUNTY OF HENRY THURSDAY, OCTOBER 7, 2021

Pursuant to Article 8.B of the rules and regulations of the Board of Court Reporting of the Judicial Council of Georgia, I make the following disclosure:

I, Kathryn Taylor, am a Georgia Certified Court Reporter. I am here as an independent contractor for Trustpoint.One | Alderson Reporting.

Trustpoint.One | Alderson Reporting was contacted by Tobin Injury Law, to provide court reporting services for this deposition. The firm will not be taking this deposition under any contract that is prohibited by O.C.G.A. 15-14-37(a) and (b).

THURSDAY, OCTOBER 7, 2021



KATHRYN TAYLOR, CCR

No. 5082-8490-7080-9088

CERTIFIED COURT REPORTER

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C E R T I F I C A T E

STATE OF GEORGIA )  
COUNTY OF HENRY )

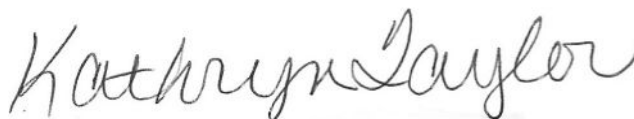
I, KATHRYN TAYLOR, Certified Court Reporter for the  
County of Henry and for the State of Georgia, do hereby  
certify:

That the foregoing transcript is a true and accurate  
account of evidence and testimony taken by me in the matter  
of KATHRYN MIDDLETON, INDIVIDUALLY AND AS NEXT FRIEND OF  
JENNAH MIDDLETON, A MINOR versus TERRANCE WILSON, to the best  
of my ability.

I further certify that the foregoing pages 5 through 44  
of testimony represent a true and correct record of the  
evidence given upon said plea;

And I further certify that I am not a relative by blood  
or marriage, or an employee of attorney or counsel of any of  
the parties in the case, nor am I financially or in no way  
interested in the outcome of the action.

This, the 18th day of October, 2021



KATHRYN TAYLOR, CCR  
No. 5082-8490-7080-9088  
CERTIFIED COURT REPORTER





CERTIFICATE OF DEPONENT

I hereby certify that I have read and examined the foregoing transcript, and the same is a true and accurate record of the testimony given by me.

Any additions or corrections that I feel are necessary, I will attach on a separate sheet of paper to the original transcript.

\_\_\_\_\_

Signature of Deponent

I hereby certify that the individual representing himself/herself to be the above-named individual, appeared before me this \_\_\_\_ day of \_\_\_\_\_, 20\_\_, and executed the above certificate in my presence.

\_\_\_\_\_

NOTARY PUBLIC IN AND FOR

\_\_\_\_\_

County Name

MY COMMISSION EXPIRES:

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