

In The Matter Of:
Deleon vs. Knowlton

Deposition Of:
Lanadja Knowlton

Taken On:
8/16/2023

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IN THE STATE COURT OF COBB COUNTY
STATE OF GEORGIA

ALESIA DELEON,
Plaintiff
vs.
LANADJA KNOWLTON,
Defendant

CIVIL ACTION FILE
NO. 23-A-708

DEPOSITION OF LANADJA KNOWLTON
VIA REMOTE VIDEOCONFERENCE
Wednesday, August 16, 2023
1:00 p.m.

Witness remote location: Marietta, Georgia
Heather S. Cruz, RPR, CCR-2727

1 REMOTE APPEARANCE OF COUNSEL:

2 On behalf of the Plaintiff:

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10 On behalf of the Defendant:

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22

23 (Reporter disclosure submitted pursuant to Article
24 10(B) of the Rules and Regulations of the Georgia Board
25 of Court Reporting of the Judicial Council of Georgia.)

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1 THE COURT REPORTER: This is Heather Cruz with
2 Pope Reporting. I am a Certified Court Reporter in
3 the State of Georgia. I am not a relative or
4 employee of any party in this action. I have no
5 direct contract with any party in this action, nor
6 am I financially interested in its outcome.

7 The witness has identified herself to this
8 court reporter as Lanadja Knowlton.

9 I will ask counsel to agree on the record that
10 there is no objection to the remote swearing of this
11 witness.

12 Counsel, please state your name and agreement
13 on the record.

14 MR. WALKER: Campbell Walker for Plaintiff and
15 no objection from me.

16 MS. IRACI: Kate Iraci for Ms. Knowlton as
17 Defendant. We're in agreement to the remote
18 swearing.

19 LANADJA KNOWLTON,
20 having been first duly sworn, was examined and testified
21 as follows:

22 MR. WALKER: Thank you, Madam Court Reporter.

23 This will be the deposition of Lanadja
24 Knowlton, Defendant in the case of Alesia Deleon
25 versus Lanadja Knowlton, which is filed in Cobb

1 State Court, Civil Action File Number 23-A-708.

2 This deposition is being taken by agreement and
3 pursuant to a notice of deposition, which was sent
4 to Ms. Knowlton's attorneys.

5 The deposition will be taken for all purposes
6 allowed by law pursuant to the Georgia Civil
7 Practice Act for purposes of cross-examination and
8 discovery and for use as evidence at trial.

9 All objections are reserved until the time of
10 trial or first use, except as to the form of the
11 question and responsiveness of the answer and
12 privilege.

13 Is that all right, Kate?

14 MS. IRACI: Yup. Agreed.

15 EXAMINATION

16 BY-MR. WALKER:

17 Q. All right. My name is Campbell Walker. I'm
18 one of the attorneys representing the Plaintiff in this
19 case, Ms. Knowlton, and I'll be taking your deposition
20 today.

21 I promise I'll try and get through it as
22 quickly as possible so you can take care of your baby.

23 **A. Yeah. And I got to get my son from school at**
24 **2:00. But we should be fine. We should be fine.**

25 MR. WALKER: All right. It's August 16th,

1 2023. It's approximately 1:00 o'clock. And we're
2 taking this deposition over Zoom. Present is
3 Defendant's counsel, Kate Iraci.

4 MS. IRACI: Iraci.

5 BY MR. WALKER:

6 Q. Ms. Knowlton, as you may have heard, this
7 deposition is not really like a regular conversation.
8 The court reporter is transcribing everything. And so
9 for clarity of the record, which she's typing up as we
10 talk, there's a couple of points I just want to go over
11 before we get to the questions.

12 I'll be asking you questions and your answers
13 will be recorded by the court reporter. If you would,
14 please let me fully ask the question before answering,
15 and I promise I'll do my best to let you fully answer
16 before I ask another question.

17 I'm interested in learning everything that you
18 know about the events and facts that underlie this
19 lawsuit, so I'm looking for full and complete answers.

20 If you could please verbalize your answers to
21 my questions. Shaking your head or nodding your head
22 can't be recorded. So if you just say yes or no or I
23 don't understand that will help the court reporter and
24 everyone as we move forward.

25 If I ask a question that you don't understand,

1 please just let me know. I'm happy to rephrase it.
2 Unless you tell me otherwise, I'll assume that you do
3 understand the question and that you're answering
4 accordingly.

5 If you remember any additional information for
6 a question that you've already answered or you need to
7 clarify a previous answer, please just tell me when you
8 think about that and we can address it right then.

9 **A. Okay.**

10 Q. If while answering you think of documents that
11 might help you remember the answer, just let me know. We
12 might have those documents available and I can show it to
13 you on the screen.

14 Are you taking any medications or drugs of any
15 kind that might make it difficult for you to understand
16 my questions today?

17 **A. No.**

18 Q. Okay. Are you sick at all today?

19 **A. No.**

20 Q. Are you under a doctor's care for any
21 illness?

22 **A. No.**

23 Q. Okay. I'm going to ask you a lot of questions
24 and some of them you're going to think have absolutely
25 nothing to do with this lawsuit.

1 **A. Okay.**

2 Q. I just got to get some information about your
3 background and you personally, and then we'll talk about
4 the case.

5 **A. Okay.**

6 Q. All right. And I know you did this already,
7 but it was off the record.

8 Could you spell your full name?

9 **A. Yes. It's Lanadja Nykeia Knowlton, so it's**
10 **L-a-n-a-d-j-a. Nykeia is N-y-k-e-i-a. Knowlton is**
11 **K-n-o-w-l-t-o-n.**

12 Q. Okay. And you're aware that you're being sued
13 by my client for damages that she alleges she sustained
14 in a wreck with you, right?

15 **A. Yeah. Uh-huh.**

16 Q. Do you remember the wreck?

17 **A. Yes.**

18 Q. Do you remember the date?

19 **A. I don't remember the exact date, but I remember**
20 **the day and everything, what I did that day, so.**

21 Q. Okay. Do you remember what road it was on?

22 **A. Yes. See, I honestly get confused because it**
23 **was like Cumberland Boulevard and like Spring or**
24 **something like that. It was like the crossing street.**
25 **So I always get the streets confused, but I know I was**

1 **turning left.**

2 **I believe it was Cumberland Boulevard, I think.**

3 **I'm not sure to be totally honest with the streets.**

4 Q. Okay.

5 **A. I'm not from Atlanta so I'm always bad with**
6 **streets here.**

7 Q. But it was that intersection as far as you
8 understand?

9 **A. Yes.**

10 Q. Okay. Can I get the last four of your social
11 security number?

12 **A. Yes. It's 0398.**

13 Q. Okay. Thank you. And if you need to take a
14 break for your baby, just please let me know. I'm happy
15 to do that.

16 **A. I think she's okay. She's just fussy because**
17 **of a cold.**

18 Q. Okay. What's your date of birth?

19 **A. My date of birth?**

20 Q. Yes.

21 **A. April 25th, two thousand -- I mean 1997. I was**
22 **about to say 2023.**

23 Q. And how old does that make you?

24 **A. I'm 26 years old.**

25 Q. Okay. Are you married?

1 (Technical interruption.)

2 MR. WALKER: I think Lanadja's screen is

3 frozen.

4 BY MR. WALKER:

5 Q. Lanadja, are you there?

6 **A. Yes. Can you hear me?**

7 Q. Yes. I can hear you. Thank you.

8 **A. Okay. Sorry. Did you hear me? I said making**

9 **me 26 years old.**

10 Q. Yes. I got that. Thank you.

11 Ms. Knowlton, are you married?

12 **A. No, I am not.**

13 Q. Okay. Do you have any previous marriages?

14 **A. No.**

15 Q. Okay. And I know you have at least one child.

16 Do you have any other children?

17 **A. Yes. I have two.**

18 Q. Okay. What's your current home address?

19 **A. 867 Cedar River Court, Marietta 30067.**

20 Q. Is that the same address that you had at the

21 time of the collision?

22 **A. Yes.**

23 Q. And what was your phone number at the time of

24 the collision?

25 **A. It was (470) 900-7023. I believe it was the**

1 **same number that I have.**

2 Q. The same number that you have now?

3 **A. Yeah.**

4 Q. Okay. Thank you. Could you give me other
5 addresses that you've lived at in the past 10 years?

6 **A. In the past 10 years. Okay. Well, you want
7 addresses that I stayed at?**

8 Q. Yes, please.

9 **A. 19448 Santa Rosa, Detroit, Michigan. The zip
10 code was 48221. And that's really like the only place
11 that I've really like stayed at since before here.**

12 Q. Okay. So you moved from Michigan to Atlanta?

13 **A. Yes.**

14 Q. You were living in Detroit?

15 **A. Yes. I'm from Detroit. Yes.**

16 Q. Okay. Why did you move to Atlanta?

17 (Technical interruption.)

18 Q. Sorry, Ms. Knowlton. Your screen is -- your
19 connection is a little spotty.

20 **A. Is it? Let me see if I can move.**

21 **Better? Can you guys hear me?**

22 Q. I can hear you. Yes.

23 **A. Hello?**

24 (Technical interruption.)

25 MR. WALKER: We'll give it a minute while

1 Ms. Knowlton's screen is frozen.

2 Ms. Knowlton has lost connection and she's
3 reconnecting.

4 **A. Can you hear me?**

5 BY MR. WALKER:

6 Q. Yes, ma'am.

7 **A. I'm sorry. I don't know what's going on with
8 my wi-fi here.**

9 Q. That's okay. As long as we can get through the
10 deposition, that will be all right.

11 **A. Yeah.**

12 Q. Okay. How did you find out about the
13 lawsuit?

14 **A. I got served. They actually -- they came and
15 gave my boyfriend the papers.**

16 Q. Okay. Who is your boyfriend?

17 **A. His name is Darryl Clemons.**

18 Q. Does he live with you at the address that
19 you're currently at?

20 **A. Yes.**

21 Q. Are you a member of any church or country
22 club?

23 **A. Not anymore. I just found a church here. But
24 I just started attending like two Sundays ago, so I don't
25 know if I should say them.**

1 **But since I moved here, I'm just now finding a**
2 **church. Like a home church for me.**

3 Q. Okay. Good. What church is that?

4 **A. It's called The Dream Center Atlanta.**

5 Q. And where is that?

6 **A. It's like Decatur. It's like in Decatur. I**
7 **would have to show you on GPS to tell you exactly where**
8 **because I just use GPS, but in Decatur for sure.**

9 Q. Are you in or were you ever in the military?

10 **A. No.**

11 Q. Were you a part of or are you a part of any
12 civic organization?

13 **A. No.**

14 Q. Do you have any relatives in the area?

15 **A. No. I actually don't have no family here.**

16 Q. Okay. And before you dropped off, I asked why
17 you moved to Atlanta. Why is that?

18 **A. Oh, I moved here because my kids' father, he**
19 **does music, so it was just better for our family here.**

20 Q. Okay. Cool. Did you complete high school?

21 **A. Yes, I did.**

22 Q. And was that in Detroit?

23 **A. Yes.**

24 Q. Okay. Did you go to college?

25 **A. No.**

1 Q. What was the name of your high school in
2 Detroit?

3 **A. It was like an online high school that I**
4 **finished at. It was called Ferndale Digital Learning**
5 **Center.**

6 Q. Okay.

7 **A. So it was more like a -- we went to the campus,**
8 **but it was like an online school.**

9 Q. Do you have any certifications or degrees or
10 licenses?

11 **A. No. I have a CNA license.**

12 Q. Could you explain what that is?

13 **A. Oh, a CNA. A certified nurse assistant. So**
14 **it's like, you know, like nurse type of work.**

15 Q. Okay. Could you tell me what your current job,
16 please?

17 **A. I'm currently not working because my baby has**
18 **Trisomy 18, so it's kind of hard to work right now with**
19 **a, you know, sick baby.**

20 Q. Yeah. Sure. I'm sorry to hear that.

21 Were you working at the time of the wreck?

22 **A. Yeah. I actually -- I did like makeup, so I**
23 **was getting into doing makeup. That's where I was**
24 **leaving from, a makeup class when the it happened.**

25 Q. Okay. So you were going to --

1 **A. I was coming from --**

2 Q. No. I'm sorry. Before that were you going to
3 school to be an aesthetician?

4 **A. Yes. So that's been a goal for me, but due to**
5 **my pregnancy, that kind of got pushed back. But that's**
6 **what I'm suppose to be doing now is being in school,**
7 **so.**

8 Q. Okay. So what were you doing for work, I'm
9 sorry if I missed it, at the time of the collision?

10 **A. At the time of the collision, I had a job, a**
11 **CNA job which was nursing assistant at a nursing home.**
12 **It was called Arbor Company of Trace. Yeah. That's**
13 **where I was working at.**

14 **And I was doing that kind of like contingent,**
15 **so it really wasn't, you know, a set schedule. But that**
16 **was the job that I was doing on top of trying to do my**
17 **makeup classes to start doing makeup.**

18 Q. Okay. So you could kind of set your
19 schedule?

20 **A. Yeah. I set my schedule because I had a four**
21 **year old at the time who wasn't in school, so it was**
22 **just, you know.**

23 Q. All right. Not including this case, have you
24 been a part of any other lawsuits?

25 **A. No. Ever. No. Well, I guess the other party**

1 that was in this accident, he actually came -- he sued me
2 as well. But that's who -- I didn't actually hit him,
3 but yeah. So other than that. But we didn't have to do
4 like anything like this. They just settled with him and
5 it was over.

6 Q. Okay. And what do you mean they settled with
7 him?

8 A. Well, my insurance company. I'm sorry.

9 Q. Okay. No. That's fine. I understand.

10 A. Yeah.

11 Q. Do you know anything about that settlement?

12 A. I actually do not. At that time I was kind of
13 in the process of about to have my baby and I had a lot
14 going on, like you know, as far as just like my mental
15 and everything with what my baby had going on. So to be
16 honest, I didn't really pay that too much attention
17 because I had too much going on.

18 Q. Okay. How did you find out that they settled
19 the case?

20 A. Someone will call me. He will call me and just
21 tell me everything that was going on. So they was
22 telling me that they were -- they was going to settle
23 with him for an amount. I do not remember the amount.
24 But yeah. They had told me that, what was going on.

25 Q. Okay.

1 MS. IRACI: I'm sorry to interrupt, but I just
2 want to make perfectly clear to Ms. Knowlton that
3 you don't have to disclose anything that you
4 discussed with an attorney. So if you had
5 conversations with my office related to that claim
6 or any other attorney that Progressive has hired for
7 you, you don't have to disclose any of those
8 conversations.

9 **A. Okay.**

10 MS. IRACI: Just so you know.

11 **A. Okay.**

12 MR. WALKER: Yeah. Thank you, Kate. I'm
13 sorry. I would have said that, but I thought we
14 were talking about communications with the insurance
15 company.

16 MS. IRACI: Right. Right. Yeah. I wanted to
17 make clear. Sometimes my clients don't know where
18 the insurance company leaves off and the attorney's
19 office picks up.

20 MR. WALKER: That makes sense.

21 MS. IRACI: I want to make sure that I explain
22 that to Ms. Knowlton.

23 MR. WALKER: Absolutely. Yeah.

24 BY MR. WALKER:

25 Q. I don't want to know anything your lawyers have

1 said to you at all, ever.

2 **A. Yeah. No.**

3 Q. But that does bring me to another question that
4 I have, which is how did you prepare for your deposition
5 today, if at all?

6 **A. Well, what do you mean?**

7 Q. Did you prepare for your deposition, this
8 deposition?

9 **A. So when you say prepare, I really don't know
10 exactly what you're asking.**

11 **Yeah. I guess it's prepared. I spoke to
12 someone. They told me what was going on and what we was
13 going to do today. And then that was pretty much it,
14 so.**

15 Q. Do you know if that person was a lawyer or from
16 your insurance company?

17 **A. Yes. That person was from my insurance
18 company.**

19 Q. Okay. Did you review any documents?

20 **A. I'm sorry. What did you say?**

21 Q. Did you review any paperwork, any documents?

22 **A. Yes, I did.**

23 Q. Okay. Do you remember what those documents
24 were?

25 **A. Just documents on the case and everything**

1 **that's going on as far as the case.**

2 Q. So was it like the Complaint perhaps that the
3 Plaintiff filed?

4 **A. No. It was not the Complaint. I believe that**
5 **was in the paperwork that got served to my home.**

6 Q. Yes.

7 **A. Yeah. But yeah. The paperwork that I've been**
8 **receiving as far as getting ready for the deposition**
9 **today was just letting me know everything that I was**
10 **looking forward to today. Things like that.**

11 Q. Okay. And that was coming from your insurance
12 company?

13 **A. Yes.**

14 Q. And do you know who your insurance company
15 is?

16 **A. Yes. Progressive.**

17 Q. Okay. Do you have any of those documents with
18 you?

19 **A. No, I don't. I mean it's in my emails.**

20 Q. Okay.

21 **A. And then paperwork that got served to me. I**
22 **have that paperwork.**

23 Q. Okay. Did you speak with anyone to refresh
24 kind of your memory of the events of the collision?

25 **A. No.**

1 Q. Okay. Did you look at the police report at all
2 while you were preparing?

3 A. No. I don't even know where the police report
4 is. The accident was so long ago. I didn't even think
5 that we were still dealing with the accident.

6 Q. So you haven't even seen the police report?

7 A. Well, yeah. From the original accident from
8 the night. Yes. I had the police report.

9 Q. Oh, okay. You saw that?

10 A. Uh-huh.

11 Q. What did your insurance company representative
12 tell you in preparation for this deposition?

13 A. Not really -- they didn't really tell me too
14 much. They just told me what was going on and what we
15 had to do, and that was just we're on this Zoom call
16 because this is one of the things that we had to do. And
17 then I kind of don't know what's the next steps from
18 here.

19 Q. Okay. And we're about to talk about the wreck
20 itself. I just want to make sure that we kind of
21 understand each other before I get into it.

22 You understand that when I refer to the
23 intersection, I'm talking about the intersection of
24 Spring Road and Cumberland Boulevard where the wreck
25 happened?

1 **A. Okay. Yes.**

2 Q. Okay. What was the purpose of your trip that

3 day?

4 **A. The purpose of my trip?**

5 Q. Yes.

6 **A. The purpose of my trip was I was leaving**

7 **from -- I was leaving from a girl that was doing the**

8 **makeup class, and then I was about to go home.**

9 **Sorry. Give me one moment, please.**

10 Q. Yeah.

11 **A. I'm sorry.**

12 Q. That's okay, Ms. Knowlton.

13 All right. Did you have any passengers with

14 you?

15 **A. I'm sorry. You said what?**

16 Q. Did you have any passengers with you?

17 **A. No.**

18 (Technical interruption.)

19 MR. WALKER: Ms. Knowlton's screen has frozen

20 and we are waiting for it to come back.

21 **A. Can everybody hear me?**

22 BY MR. WALKER:

23 Q. I can hear you now. Yes.

24 **A. Okay.**

25 Q. Let me know when you're in a good spot of your

1 house.

2 **A. I'm in a good spot.**

3 Q. Okay. Are you ready?

4 **A. Uh-huh.**

5 Q. Okay. Did you have any passengers with you?

6 **A. No, I did not.**

7 Q. Do you remember what the weather was like at
8 the time of the collision?

9 **A. Yeah. It was -- it was like rainy that
10 night.**

11 Q. Okay. Do you remember what time the collision
12 was?

13 **A. I --**

14 Q. You don't have to give me -- I'm sorry.

15 **A. Maybe it was about -- maybe it was about maybe
16 7:00 or 8:00. I know it wasn't too late, but it wasn't
17 like too early.**

18 Q. What was the traffic like at the time of the
19 collision?

20 **A. It was pretty kind of thick because in that
21 area there's so many like ways to go. So it's like you
22 got the turning way. You can come this way. That way.
23 Like it's just so much, you know, traffic each way. So
24 it was pretty thick out there. And then, you know, that
25 area is like by the mall, so it's always like a lot going**

1 **on.**

2 Q. Have you driven through that area a good bit
3 would you say?

4 **A. Yeah. I drive through that area all the time.**
5 **All the time.**

6 Q. So would you say that the traffic conditions
7 were like medium or heavy?

8 **A. I would say about medium. Because again, like**
9 **I said, it was a rainy night, so it was like everybody**
10 **was kind of, you know, driving kind of with care because**
11 **it was just so much going on. It was super wet and**
12 **stuff. So it was a medium night I would say.**

13 Q. Okay. Was it difficult to see anything in the
14 intersection?

15 **A. No. You could see because it's a lot of**
16 **lights. It's a lot of businesses. It's a lot over**
17 **there.**

18 Q. Was it raining heavy or was it kind of just
19 raining before and so it made the roadway wet?

20 **A. Yeah. So it was kind of like it had been**
21 **raining like before. It really wasn't coming down heavy**
22 **in that moment, but it was coming down a little bit. It**
23 **was coming down a little bit for sure.**

24 Q. Okay. Was there any construction around?

25 **A. No. Unh-unh.**

1 Q. Okay. When you were approaching the
2 intersection, how many cars -- let's talk about to your
3 right. So your passenger side. Were there cars to your
4 right?

5 A. So yes. There was cars to my right. Yes. And
6 the cars that was to my right of course go straight past
7 the light.

8 But I was in the turning lane to go left. So I
9 sat there, you know, as the cars proceeded past me.

10 Q. Okay. And then were there any cars behind you
11 that you remember?

12 A. Yeah. It was -- well, I can't even tell you
13 how many, but I know there was a car behind me. And then
14 I was behind a car. I was like the second car to be able
15 to turn left.

16 Q. Okay. So you were second in line to make a
17 left turn?

18 A. Yes.

19 Q. Okay. So I'm assuming the car ahead of you had
20 made a left turn before this happened?

21 A. Yes.

22 Q. Okay. I have not been to that intersection.
23 Is it level or is it -- is like there a hill or a
24 decline, what's it like?

25 A. No. It's pretty surface -- yeah. It's pretty

1 **smooth.**

2 Q. Pretty flat?

3 **A. Yes. Pretty flat. Yeah.**

4 Q. Do you know, it's okay if you don't, do you
5 remember how many lanes there were from your side?

6 **A. Yes. It's -- oh, I can't -- I want to say
7 it's -- no. I want to say it's three lanes to be able to
8 go, and then it's that turning lane that I was in. So
9 yes. It was like three lanes.**

10 Q. Okay. Do you know if the car that turned left
11 in front of you was making a U-turn or was that car
12 making a left turn, do you remember?

13 **A. No. That car was making a left turn.**

14 Q. Okay. Were there any other -- are there any
15 like big billboard commercial signs at that
16 intersection?

17 **A. No. Only big signs I remember seeing was
18 McDonald's because it's a McDonald's right there at the
19 corner. Then there was a Panda Express on the left side
20 of me. And then on the right side of me it was a gas
21 station. And that's actually where I was leaving out
22 from, the gas station. But I had made it all the way
23 into my lane to turn. But that was the only thing I
24 seen.**

25 Q. Okay. So you had come -- I just want to make

1 sure I understand.

2 So you had come from the gas station that was
3 on your passenger side as you're sitting in that left
4 turn lane?

5 **A. Yes.**

6 Q. Okay.

7 **A. Yes.**

8 Q. And then you crossed the lanes of travel, got
9 in, and were able to get into that left turn lane?

10 **A. Yes.**

11 Q. Okay. All right. I get it.

12 Do you know the lane -- so there were cars to
13 your right. Were they passing straight through the
14 intersection?

15 **A. Yes. Yes.**

16 Q. Okay. So they had a green light?

17 **A. Yeah. They had -- we was all at the light
18 together. But you know when you're in a turning lane,
19 it's like your light could be different from -- because
20 your lights go -- it's like green arrow, the yellow
21 arrow, and then it's red again.**

22 Q. Right.

23 **A. So yeah. So I can't remember if we all had the
24 right of way at the same time because I was, you know,
25 looking of course where I was going. But yeah. That's**

1 **how it was set up.**

2 Q. Okay. So and sometimes intersections have a
3 green arrow and sometimes they do like a flashing
4 yellow --

5 **A. Uh-huh.**

6 Q. -- both lanes of travel are passing through?

7 **A. Yes.**

8 Q. Do you understand that?

9 **A. Wait. I'm sorry. Wait. What did you say?**

10 Q. So like there will be like a flashing yellow
11 arrow --

12 **A. Uh-huh.**

13 Q. -- to say that you can take a left turn, you
14 just have to yield?

15 **A. Right.**

16 Q. Okay. Do you know if you had a flashing yellow
17 arrow?

18 **A. So that was -- that was what the officer had --
19 when he -- when the officer arrived, that was something
20 that he had said. He was like it was -- because he
21 studied the lights while we was there, so he was like it
22 was an unfortunate type of situation because the way how
23 the lights were set up, it's like it did turn flashing
24 yellow, but it turned flashing yellow after I had already
25 kind of, you know, made it outside of being able to view**

1 the lights, you know, like after I moved up a little bit.

2 So that was how -- that was how the collision
3 actually had happened because as I'm going -- it's a big
4 intersection. So as I'm going, it's flashing yellow, and
5 I didn't make it across fast enough.

6 So as she was coming up, which was -- which is
7 your client. I don't know her name. But when she was
8 coming up, that was when -- I guess as she was
9 approaching, the light turned green for her, so she was
10 able to just keep going. And that's how it happened.

11 Q. Okay. And when you were -- you said before you
12 were looking ahead, you were looking into the
13 intersection; is that right?

14 A. Yes. I was looking -- I was paying attention
15 to the lights.

16 Q. Okay. Yeah. And what was your -- what were
17 you trying to do as you turned -- I think I've read, and
18 please correct me if I'm wrong, but I think I read that
19 you were trying to make a U-turn; is that right?

20 A. No. No.

21 Q. Go ahead.

22 A. I was trying to make a full left turn.

23 Q. Okay. You were turning left.

24 All right. As you were approaching the
25 intersection, what was your speed?

1 **A. Well, going -- turning like that when it's wet,**
2 **I really wasn't going too fast because I had a brand new**
3 **car at the time. I had like a brand new car. So I'm**
4 **super cautious, so I was not going fast.**

5 I would guess I would say that -- I couldn't
6 really give you like a number on it because I don't want
7 to just say a number and I'm completely off. But I was
8 not going fast at all. I was just turning. Just doing a
9 turn.

10 Like I don't even know how to -- I guess I
11 could say I was maybe going -- I don't know. Maybe about
12 20 miles per hour or somewhere up in there. But it
13 wasn't like I was turning super fast, so.

14 Q. Okay. Do you know if -- do you remember if
15 right before the impact, if your foot was on the gas or
16 the brake pedal?

17 **A. Yeah. Right before the impact, my foot was on**
18 **the gas because I was turning. I was proceeding to turn.**

19 Q. Okay.

20 **A. It was kind of like too late to brake because**
21 **it was just -- it just happened so fast, so.**

22 Q. Could you tell me as best as you can remember
23 about from the beginning of that trip, like when you
24 first got in the car to leave -- I believe you said you
25 were leaving the --

1 **A. Like the class. Yeah.**

2 Q. Okay. From there do you remember your route at
3 all, can you kind of explain it to me, what it was
4 like?

5 **A. Well, it was a lot of -- I was on the freeway
6 because I had to kind of -- I came from -- I came from
7 like Buckhead area and I live in Marietta.**

8 So yeah. I ended up -- I know I ended up -- I
9 ended up taking another route because I was thinking
10 about stopping to grab food from like a wing place that
11 was up that road where I turned left. But I didn't make
12 it there of course because I got into the car accident.

13 But yeah. It was like a pretty straight ride.
14 It was like -- yeah. It was like I left from Buckhead.
15 I was on the freeway. I got off.

16 Where did I get off at? I hate that I don't
17 know my way around here because it's so hard to describe
18 it to y'all.

19 But yeah. I don't know. It was just a smooth
20 ride. I was about to go. I was on my way home, but I
21 wanted to drive past the wing place to see if they was
22 open. And that's when everything happened.

23 Q. And that's okay. I understand. I'm an Atlanta
24 transplant, too, so it's taken me time.

25 **A. Yeah. It's confusing. It's a lot going on.**

1 Q. How long have you been living here?

2 **A. I've been here for like four years now. But I**
3 **just started -- like I always just been like kind of like**
4 **a stay-at-home mom for the first few years, so I wasn't**
5 **even like around here like that. I just recently started**
6 **getting into like, you know, doing things out here, so.**

7 Q. Okay. Yeah. I understand.

8 Do you have a favorite part of town?

9 **A. Yeah. Sandy Springs. Like Dunwoody area.**

10 Q. You would agree with me that drivers on the
11 road need to maintain a lookout ahead of them while
12 they're driving, right?

13 **A. Yes. I feel like people should drive for other**
14 **people all the time. I say that all the time.**

15 Q. And that drivers on the record can't assume
16 that the road ahead of them is clear, right?

17 MS. IRACI: Objection to form, but you can
18 answer.

19 **A. What do you mean?**

20 BY MR. WALKER:

21 Q. You would agree with me that drivers on the
22 road can't assume the road is clear ahead of them?

23 MS. IRACI: Objection. You can answer.

24 **A. I don't even understand the question, so I'm**
25 **not going to answer that.**

1 BY MR. WALKER:

2 Q. Sure. Okay. So let me see if I can rephrase
3 it for you.

4 A. Uh-huh.

5 Q. You can't assume that the road ahead of you is
6 clear when you're driving, correct?

7 MS. IRACI: Same objection. But you can
8 answer.

9 A. Because I feel like that's like you just asked
10 the same thing and you just changed like a word or two.

11 I don't know. I can't really speak for
12 everyone else, so I really don't know exactly what --
13 like I don't really get it. I don't get the answer, so I
14 can't really answer that because I don't --

15 Q. Okay.

16 A. -- want to answer something I'm not
17 understanding.

18 Q. No problem.

19 A. Uh-huh.

20 Q. You would agree with me that drivers need to
21 leave enough time to make a full left turn whenever
22 they're making a left turn, correct?

23 A. No. I wouldn't say correct because every
24 situation is different. Every turn is a little bit
25 different. So you know, it's kind of set up different.

1 **So I don't really -- I can't really say that.**

2 Q. So drivers -- you're saying that drivers do not
3 need to leave enough time to make a full left turn?

4 **A. What do you mean when you say leave enough time**
5 **to make a full left turn?**

6 Q. Essentially that they need to have enough space
7 to make a left turn without causing a collision from
8 oncoming traffic.

9 **A. I mean yeah. That's any turn. I feel like the**
10 **lights maybe should stay green enough so that people can**
11 **make a turn more correctly, if it was a situation where**
12 **the light started turning once someone already proceeded**
13 **to turn. So yes. I feel like that.**

14 Q. Okay. All right. Was your car totaled in the
15 wreck?

16 **A. Yes.**

17 Q. Did your air bags deploy?

18 **A. Yes.**

19 Q. Did you go to the hospital after the wreck at
20 all?

21 **A. Yeah. I went the next day because my legs was**
22 **kind of bruised, but that was it.**

23 Q. Do you remember what they told you?

24 **A. They just told me that I just try to take it**
25 **easy. I was just sore and had some swelling, and it**

1 **wasn't nothing.**

2 Q. Ms. Knowlton, at the intersection that the
3 wreck took place, when was the first time that you
4 remember seeing the Plaintiff's car?

5 **A. The first time I remember seeing her car after
6 the wreck?**

7 Q. Just any time. What was the first time you
8 remember seeing her car?

9 **A. Oh, I remember seeing her car once when I was
10 turning and it was a car like coming through. So that's
11 when I seen her car because -- and this is not to say
12 anything against someone, but it was just like she was
13 kind of coming fast.**

14 **So I seen her car once, you know, once she was
15 coming up on me. But like then like I said, that point
16 it was too late. There was nowhere for me to -- if I
17 would have tried to go anywhere else, I would have run
18 into someone else because there was a lot going on. So
19 that was like the time I seen her car.**

20 Q. Do you know how fast she was driving?

21 **A. I do not know how fast she was driving.**

22 Q. And there's no way for you to know how fast she
23 was driving, right?

24 **A. No. I wasn't in the car with her. I could
25 just see a car just coming up to me.**

1 Q. Okay. Do you remember what the Plaintiff did
2 after the accident?

3 A. Yeah. She drove up a little bit and then she
4 stopped.

5 Q. Did you call anyone after the collision?

6 A. Yes. First I called the police. And then --
7 actually, my car started calling the police for me
8 instantly anyway because it was the kind of car it was.
9 But yeah. The police end up calling --
10 connected to my car. I told them where I was and what
11 happened.

12 And then I got out of my car when I could
13 because my car -- my door was kind of like -- it was like
14 because when she hit the front, it kind of like smushed
15 in, so kind of had my door hard to open.

16 Once I made it out of my car, then I called my
17 child's father.

18 Q. And that's your boyfriend, correct?

19 A. Yes. Yes.

20 Q. What type of car were you driving?

21 A. I was driving a Mercedes-Benz. It was a GLA
22 AMG Mercedes-Benz.

23 Q. Do you remember how long it took the police to
24 get there roughly?

25 A. Roughly -- they got there pretty fast. Cobb

1 **County would be on it. So they maybe came in like 10**
2 **minutes. Maybe not even a whole 10 minutes.**

3 Q. Did you ever speak with anyone at the scene of
4 the collision?

5 **A. You mean like the other individuals who was in**
6 **it with me?**

7 Q. So let me break it down. You spoke with the
8 police at the scene?

9 **A. Yes. Yeah.**

10 Q. Did you speak with the Plaintiff at the scene
11 of the collision?

12 **A. No.**

13 Q. Okay. Did you ever see her?

14 **A. Yeah. I seen her. We was both talking to the**
15 **police. So she was standing outside talking to them, and**
16 **then so was I. But we was just -- she was like where her**
17 **car was and then I was where my car was, so.**

18 Q. And that was pretty far apart, right?

19 **A. Yeah. Because after she hit my car, she drove**
20 **up a little bit. And I guess that's when she hit the**
21 **other car. I didn't actually see them hit, so I really**
22 **don't know. But I know she drove up a little bit, and I**
23 **seen her and the other guy kind of like having an**
24 **interaction, so.**

25 Q. Okay. Did you ever speak to the other guy?

1 **A. No.**

2 Q. Did an ambulance come to the scene?

3 **A. No.**

4 Q. Okay. Did firefighters or anyone like that
5 come to the scene?

6 **A. No. Just tow truck.**

7 Q. Okay. Do you remember if anyone was around
8 that saw the wreck, but wasn't a part of the wreck?

9 **A. To be honest, no. After it happened, a few
10 people did come up to me asking me was I okay. But I
11 believe those was just people kind of driving by and just
12 seen what happened. But yeah. I couldn't tell you if it
13 was anyone around because I really wasn't paying
14 attention to, you know, people that were standing
15 outside. Like it was just me driving, at the
16 intersection waiting to turn, and I turned when I was
17 able to turn.**

18 Q. Okay. Did any of these people give you their
19 name or leave a card or anything?

20 **A. No. They just asked me was I okay. I said I
21 was okay.**

22 I'm like a person that's real like -- I didn't
23 really want anyone around me that I didn't know, so I'm
24 just like I'm okay, so they can, you know, go back to
25 where they was from.

1 Q. Okay. Thanks. Did you speak to any of your
2 friends about the wreck?

3 **A. Maybe like days after. Yeah. I was a little**
4 **embarrassed about my brand new car getting crashed, so I**
5 **didn't really want to tell anyone.**

6 Q. That's understandable.
7 Who do you remember talking about the wreck
8 with?

9 **A. Just my boyfriend and my mom.**

10 Q. Okay. And does your mom live in Detroit?

11 **A. No. She lives in Jacksonville, Florida.**

12 Q. Okay. What did you tell your mom about the
13 wreck?

14 **A. I just had told her that I got into a car**
15 **accident. And then of course any parent asks how. So**
16 **she asked how, and then I told her exactly what happened.**
17 **And then that was just that.**

18 Q. Okay. And what did you tell your boyfriend
19 about the wreck?

20 **A. I told him what happened because he was**
21 **actually upset because the car actually was a business**
22 **car in his business name for like a car that he was going**
23 **to use for business. So he just of course asked what**
24 **happened. And I told him what happened.**

25 **And then yeah. At that point it was more so**

1 **just you're okay, you know, just being happy that I was**
2 **okay, so that's that.**

3 Q. What business was he going to use the car
4 for?

5 A. **So he has a record label called Forever**
6 **Records, so it was just going to be like a car -- like he**
7 **has artists and stuff. So it was just going to be like a**
8 **car like, you know, to help out the artist when they're**
9 **around like to, you know, they needed to come from the**
10 **airport. Things of that nature.**

11 Q. Okay. Cool. Do you know if the other guy's
12 air bags deployed, did you ever see his car?

13 A. **No, I didn't. Well, the guy who she had the**
14 **situation with, his car, I think it was like a little**
15 **bitty like little bump to it. But I know that he was**
16 **okay. He was cool because he drove off in his car, so.**

17 Q. Okay.

18 A. **Yeah. He was fine. But so yeah. I don't**
19 **know. I don't believe his air bags came out if he drove**
20 **off.**

21 Q. And you said that you saw her drive up a little
22 bit after the wreck. What do you remember seeing about
23 her car, the Plaintiff?

24 A. **Oh, I don't because I only -- once after me and**
25 **her hit, I know it probably had to look as crazy as mine**

1 **did because it was so like -- just like, you know, real**
2 **hard.**

3 **But I actually never really got a chance to see**
4 **her car because -- or the front of her car because once**
5 **she drove up, I only saw the back. And of course the**
6 **back of her car was fine. So I only had saw her back.**
7 **So I never really -- I didn't really get a chance to get**
8 **a good look at how her car was damaged.**

9 Q. Yeah. But you're just assuming from the impact
10 that there was a lot of damage?

11 A. **Because my car was pretty damaged, so I am just**
12 **assuming.**

13 Q. Okay. Do you take any prescription drugs?

14 A. **No.**

15 Q. Had you taken any drugs the day of the wreck?

16 A. **No. I don't take any drugs.**

17 Q. And that's not to offend. I just have to ask
18 these questions.

19 A. **I know. I would just like to clear that up.**

20 Q. Had you drank anything alcohol-wise before the
21 wreck?

22 A. **No. Unh-unh.**

23 Q. Have you ever been in a wreck before?

24 A. **No. That was my first car accident ever.**

25 Q. Okay. Have you ever been arrested for driving

1 under the influence?

2 **A. No. Never. I've never even got pulled over**
3 **before, which is crazy, but I've never got pulled over**
4 **before.**

5 Q. That's good. That's good.

6 Did you make a property claim for your car
7 after the wreck?

8 **A. No. We just totaled it out and just left it**
9 **alone because I was paying a lease on it, so it kind**
10 **of --**

11 Q. I see. Who do you think is responsible for the
12 wreck?

13 **A. Well, let them tell it, I was. I got the**
14 **ticket that night, so I was like the at-fault driver.**

15 **But to be honest, I don't think that I was**
16 **responsible for the accident because I had the right of**
17 **way to go. So I felt like if the light started turning**
18 **flashing behind me, then how was I suppose to know that.**

19 **But I was like I don't want to blame anyone**
20 **because accidents happen, and it was an accident. You**
21 **know what I'm saying. I don't think anyone wanted to**
22 **crash their cars that night. But I'm not going to blame**
23 **anyone because I think it was an accident.**

24 Q. Okay. That's fair. But just to be clear, the
25 light was not behind you, right, it was in front of

1 you?

2 **A. Well, the light was in front of me, but if I**
3 **had the right of way to go, once I proceeded to go, the**
4 **light is behind me. So that was -- that's what**
5 **happened.**

6 Q. Okay. So you do not think that the Plaintiff
7 is at fault for the wreck?

8 **A. No. I'm not going to say she was at fault. I**
9 **did feel like she probably could have -- I feel like she**
10 **wasn't paying attention. But if her light was green for**
11 **her to go, how can I say that's her fault, so.**

12 Q. Right. I agree.

13 You have no way of knowing if she was paying
14 attention or not, right?

15 **A. Unh-unh.**

16 MS. IRACI: Object to form. You can answer.

17 BY MR. WALKER:

18 Q. And by -- could you say no? I'm sorry --

19 **A. I'm sorry?**

20 Q. You said unh-unh and that's hard for the court
21 reporter.

22 **A. Oh, no.**

23 Q. Have you ever been arrested?

24 **A. No.**

25 MR. WALKER: All right. Ms. Knowlton, I'm

1 going to take a little break and look over my notes,
2 and I feel like we're pretty close to being done,
3 so.

4 THE WITNESS: Okay. I'll be right back. I'm
5 going to just go check on my baby real fast.

6 (Off the record.)

7 (Recess taken 1:52 p.m. to 1:55 p.m.)

8 BY MR. WALKER:

9 Q. Just a little bit -- just a few more questions,
10 Ms. Knowlton.

11 I remember earlier you said that you received a
12 ticket from the police officer, right?

13 A. Uh-huh.

14 Q. Do you remember what the ticket was for?

15 A. **What did the ticket say? I can't remember what**
16 **the ticket said. Yeah. I know I end up going to court**
17 **for it and I had to like pay it and stuff.**

18 **But I believe -- I can't even remember exactly**
19 **what it said. I want to say it was something like**
20 **failure to yield or something like that. I'm not sure.**
21 **I think it was something like that.**

22 Q. Okay. And you said that you just went to court
23 and paid it?

24 A. **Yeah. I had to go to court. Spoke to, you**
25 **know, someone and everything. So yeah.**

1 Q. Okay. Do you remember what type of car the
2 Plaintiff was driving?

3 **A. Yeah. Okay. So I'm very bad with cars. Only**
4 **if it's like a car that I like. But I'm so bad with**
5 **cars. But it's -- like I see it on the commercials.**
6 **Like I don't even want to say this because it's going to**
7 **sound so silly, but I see it on the commercials. Like**
8 **the hamsters be driving it. I can't think of the name.**
9 **That's the only way I can describe it.**

10 Q. I understand. Do you think if you saw the car,
11 you would recognize what it was?

12 **A. Yeah. Yeah.**

13 Q. Like oh, that's that car?

14 **A. Yeah. It's that car. Yeah.**

15 Q. All right.

16 **A. I think it's called like a Kia. Something like**
17 **that.**

18 Q. That's correct.

19 **A. Like I see it on the TV. That's it.**

20 MR. WALKER: And Heather, am I able to -- oh,
21 yeah. There we go.

22 BY MR. WALKER:

23 Q. I'm just going to share my screen very briefly.
24 Make sure I'm sharing the right thing.

25 **A. Please.**

1 Q. All right. Do you see this picture?

2 **A. Yeah.**

3 Q. Okay. Great. Is that all you see?

4 **A. Yeah.**

5 Q. Good. Then I did it right.

6 Okay. Is this the Kia that you --

7 **A. Yeah. Yeah. This is how her car looked.**

8 Q. Okay. So this is how you remember her car
9 looking?

10 **A. Well, yeah. I remember -- well, I did not see**
11 **the side or the front, so I did not -- so but yeah. But**
12 **yeah. She definitely had that kind of car. So yeah.**
13 **That's the car.**

14 Q. Just based on your experience, would you say
15 that this is pretty bad damage?

16 MS. IRACI: Objection to form.

17 **A. Yeah. Because these cars be so like -- like**
18 **how they are. So it's like yeah. I guess I would say**
19 **that's bad.**

20 BY MR. WALKER:

21 Q. Okay. Is there anything else you would like to
22 share with me about the events of this lawsuit?

23 **A. Unh-unh. No. No.**

24 Q. Is there any other information that we haven't
25 discussed that you think you'll testify to when we go to

1 trial?

2 **A. No.**

3 MR. WALKER: All right. I'll reserve the right
4 to reopen the deposition if new documents or
5 information becomes available.

6 Does the Defendant want to read and sign or
7 waive signature?

8 MS. IRACI: I haven't explained it to her yet,
9 so give me just a second.

10 Ms. Knowlton, you have the opportunity to get a
11 copy of the transcript that Ms. Heather has taken
12 everything down that you and I and Mr. Walker have
13 said today. You have the opportunity to get a copy
14 of that and review it for accuracy.

15 You cannot change the substance of your
16 responses, but you can correct any errors that may
17 have been made in taking down what we've said.

18 It's up to you if you want to do that. You can
19 either read and sign a copy and verify its accuracy,
20 or you can waive that right.

21 Heather hasn't expressed any issues with
22 hearing you or anything like that today, so I'm
23 comfortable with you waiving that right.

24 I think any time we did have some technical
25 issues with delays, it seemed like it got cleared up

1 pretty well.

2 So if you want to read and sign, or waive, but
3 I'm comfortable with you waiving, if that's what you
4 want to do.

5 Would you like to waive signature or would you
6 like to get a copy of the transcript and read and
7 verify its accuracy?

8 THE WITNESS: I'm comfortable with waiving.

9 MS. IRACI: Okay. We'll waive.

10 BY MR. WALKER:

11 Q. All right, Ms. Knowlton. I believe that's it.
12 I'm sorry we're meeting under these circumstances.

13 **A. Yeah.**

14 Q. You know, I just have a job to do and I got to
15 ask you these questions.

16 **A. No. I understand for sure.**

17 Q. Do you think that I was pretty fair with you
18 today?

19 **A. Yeah. I feel like you tried to be a little
20 tricky, but we got there.**

21 Q. Okay. All right.

22 **A. But we got there.**

23 MR. WALKER: I have no further questions.

24 Kate, if you want to ask anything.

25 MS. IRACI: I don't have any questions for you,

1 Ms. Knowlton. But I will give you a call in just a
2 minute to your cell phone number and answer any of
3 your questions, any questions you have.
4 THE WITNESS: Okay. Perfect.
5 THE COURT REPORTER: Campbell, were you going
6 to order a transcript? Did you want the original?
7 MR. WALKER: Yes, please. Actually just
8 e-tran.
9 THE COURT REPORTER: Kate, did you want to
10 order a copy?
11 MS. IRACI: I don't need a copy today.
12 (Deposition concluded at 2:01 p.m.)
13 (Waive signature.)
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1 The following reporter and firm disclosures are
2 as follows:

3 REPORTER DISCLOSURES

4 The following representations and disclosures
5 are made in compliance with Georgia Law, more
6 specifically:

7 Article 10(B) of the Rules and Regulations of
8 the Board of Court Reporting (disclosure forms)

9 OCGA Section 9-11-28(c) (disqualification of
10 reporter for financial interest)

11 OCGA Sections 15-14-37(a) and (b) (prohibitions
12 against contracts except on a case-by-case basis).

13 - I am a Certified Court Reporter in the State of
14 Georgia.

15 - I am a subcontractor for Pope Reporting & Video.

16 - I have been assigned to make a complete and accurate
17 record of these proceedings.

18 - I have no relationship of interest in the matter on
19 which I am about to report which would disqualify me from
20 making a verbatim record or maintaining my obligation of
21 impartiality in compliance with the Code of Professional
22 Ethics.

23 - I have no direct contract with any party in this
24 action, and my compensation is determined solely by the
25 terms of my subcontractor agreement.

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 - Pope Reporting & Video was contacted to provide
reporting services by the noticing or taking attorney in
this matter.

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OCGA 15-14-37(a) and (b). Any case-specific discounts
are automatically applied to all parties, at such time as
any party receives a discount.

 - Transcripts: The transcript of this proceeding as
produced will be a true, correct, and complete record of
the colloquies, questions, and answers as submitted by
the certified court reporter.

 - Exhibits: No changes will be made to the exhibits as
submitted by the reporter, attorneys, or witnesses.

 - Password-Protected Access: Transcripts and exhibits
relating to this proceeding will be uploaded to a
password-protected repository, to which all ordering
parties will have access.

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C E R T I F I C A T E

STATE OF GEORGIA:

COUNTY OF DEKALB:

I hereby certify that the foregoing transcript, pages 1 through 48, represent a true, complete, and correct transcript of the proceedings taken down by me stenographically in the case aforesaid (and exhibits admitted, if applicable); that the foregoing transcript is a true and correct record of the evidence given, taken to the best of my skill and ability.

The above certification is expressly withdrawn upon the disassembly or photocopying of the foregoing transcript, unless said disassembly or photocopying is done under the auspices of myself, and the signature is attached thereto.

I further certify that I am not a relative or employee or attorney of any party, nor am I financially interested in the outcome of this action.

This the 18th of August 2023.


Heather S. Cruz, RPR, CCR-2727

WORD INDEX

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