

// = 56 syllables (40 standard words)

Q Mrs. Cox, would you give us your name please, ma'am?

A Shirley Cox.

Q My name is Tim Jackson. I just met you a moment ago, and I'm an attorney here in Atlanta. I represent the Travelers Insurance Company, your // insurance company; and you've brought a lawsuit against the Woffords, whom you've alleged to be uninsured. They are not represented by counsel and I don't believe have ever filed an answer to this case as far as I know. //

This morning I'll be asking you some questions about yourself and // about the incident which forms the basis of your lawsuit. If at any time I confuse you in any way, you do not understand the question, please let me know.

A Okay.

Q I'll repeat it or rephrase it or do what I can so you know the question before you give an answer; okay?

A Okay.

Q Before, I noticed in reviewing the answers to the interrogatories that you filed, you // know, the questions—

A Uh-huh.

Q —that you filed, that as far as medical bills were involved, you referred to the fact that certain medical bills have been furnished, previously furnished, to the Travelers Insurance Company?

A Yes.

Q Do // you have in your possession or have you given your lawyer any medical bills that have not been furnished to the Travelers?

A No.

Q So whatever medical bills you incurred since this accident have been sent to the // Travelers Insurance Company; is that right, ma'am?

A Some of them. What I would do, when you go into—Like, I received some of the treatment from Grady Hospital. And when you go there—'cause at that time I didn't have insurance. And I // would tell them where to forward the bill to. So usually they would forward—at least, I felt they was forwarding to them.

Q Whether they did or whether they didn't, you don't know?

A No.

Q Is this you husband with you?

A Yes, its is.

Q Joseph // Cox; is that right?

A Yes.

Q How long have you and Mr. Cox been married?

A Two years.

Q Were you not married to Mr. Cox back in September of 1995?

A No, I was not.

Q So you were unmarried in September of // 1995; is that right?

A At the time of the accident?

Q Yes, ma'am.

A Right; we was not married.

Q When do you recall the date that you got married?

A We got married the 26<sup>th</sup> of October.

Q The 26<sup>th</sup> of October of what // year?

A '95.

Q Do you have any children?

A Yes.

Q What are the names and ages of your children?

A Joseph Cox. That's junior. That's the baby.

Q How old is Joseph?

A He's 14 months. And Kitty, she's six years of age. And David,  
he's ten.

Q Does // David go to school?

A Yes, he does.

Q Where does he go to school?

A Flint Elementary School.

Q Where is Kitty?

A Flint.

Q Have you been married before you married Mr. Cox?

A Yes.

Q Did that marriage end in divorce?

A Yes, it did.

Q Was that divorce filed in // Fulton County?

A Yes, it was.

Q What was the name of your first husband?

A Charles.

Q And what was his last name?

A Jones.

Q Jones?

A Uh-huh.

Q The only two times you've been married were to Charles Jones  
and Mr. Cox?

A Uh-huh.

Q When were you divorced from Charles Jones?

A It was // November the 14<sup>th</sup>. It was in—We married in '92. I think it was in '93.

Q Do you know whether or not he still lives in the metropolitan Atlanta area?

A He does.

Q Where does he work?

A I think // Cut-Rate. I think that's the name of the company; some type of box company.

Q How old are you, Mrs. Cox?

A I'm 28.

Q Did you grow up in Atlanta?

A Yes, I did.

Q Did you go to high school in Atlanta?

A Yes.

Q Where did you go?

A Archer.

Q When did you graduate from Archer?

A In '87.

Q Have you been to any schools at all since you graduated from high school, any kind of technical schools?

A Yes.

Q What have you been to?

A I went to the Manpower // Center, Westlake, for about a year.

Q Did you receive any special training?

A Yes. I was taking up nursing.

Q Did you complete the course?

A Yes. And I forwarded on to DeKalb College.

Q Did you attend DeKalb College? //

A Yes.

Q For how long?

A For about, oh, I guess, between four, six months. That's when my fiancé was killed, and I stopped going. // That's my first baby's father, David's father.

Q This was the father of—

A David.

Q And he was killed?

A Uh-huh.

Q And when // he was killed, you stopped going to school?

A Yes.

Q Were you employed at the time?

A At the time that I was going to school?

Q No. After you stopped going to DeKalb College, did you get a job somewhere?

A Yeah. I worked several places.

Q Now, // were you employed back in September of 1995 at the time of the accident that forms the basis of this lawsuit?

A Yes.

Q Where were you employed?

A Atlanta Board of Education.

Q And what did you do for the Atlanta // Board of Education?

A It was custodian's work, school custodian.

Q Have you ever done any work in the nursing field that you were taking a course of study in?

A Secretarial.

Q Secretarial work? //

A Uh-huh.

Q But for the Atlanta Board of Education, you were doing custodial work; is that right?

A Uh-huh.

Q When did you go to work at the Atlanta Board of Education?

A I started August the 12<sup>th</sup>. I was hired // permanent August the 12<sup>th</sup>. It was in '94.

Q Of 1994?

A Uh-huh.

Q From the time you started, August 12<sup>th</sup>, 1994, up until September of 1995, had you missed any time from work for // any injury that you had suffered either on the job or otherwise?

A No. Unh-unh.

Q Prior to September 21, 1995, Mrs. Cox, had you ever been injured in any type of automobile // accident?

A Unh-unh.

Q Is that a no?

A That's a no.

Q Had you ever been hospitalized for any other reason other than to give birth to // your children?

A No.

Q Until today, have you ever been hospitalized for any reason at all other than to give birth to your three children?

A No.

Q Back in September of 1995, Mrs. Cox; were you under the treatment // of any doctor for any reason at all?

A Dr. Tulkoff.

Q I'm sorry; I didn't make that question clear. Before this accident, before you went to the doctor, were you under the treatment of any doctor for // any reason at all?

A No.

Q Now, where did the accident on September 21, 1995, take place?

A It was on the corner of Fairburn and Cascade. Wasn't that Cascade?

Q Isn't that out there somewhere the perimeter?

A I think so.

Q Were you familiar with that particular intersection? Had you been on that route several times?

A Uh-huh. I live in the area.

Q Whose automobile were you in?

A Joseph's.

Q Your now husband; is that right?

A Yes. Uh-huh. //

Q What kind of automobile were you in?

A I'm not very good at cars.

Q I don't—I'll ask him those questions. Who was driving that automobile?

A My husband.

Q Now, was there anybody in that vehicle other than Mr. Cox // and yourself?

A No.

Q Where were you going at the time of the accident?

A That's personal.

Q Well, I mean, were you going to see a friend or—

A No. We was going to be alone.

Q Just to be together?

A Uh-huh.

Q And you were going // out, what, Cascade Road?

A Yes.

Q And—

A Not Cascade; Fairburn. Fairburn runs across Cascade.

Q You were going out Fairburn Road?

A Uh-huh.

Q At that intersection, Mrs. Cox—is that intersection controlled by any sort of traffic control device? What I mean by that is either a red light or a stop sign, something like that.

A Yes; you have a red light. It's a four-way, you know, coming this way and this way.

Q But is it done by a red light as opposed to a stop sign?

A Yes, uh-huh. //

Q And when you were approaching that intersection, were you looking straight ahead in the direction that your car was going in?

A Yes, we were.

Q And when you first saw the intersection and could first see the light, Mrs. Cox, what color // was that light?

A It was a caution light. It was a yellow light, caution light.

Q Then did it turn to red?

A It turned red.

Q Did you stop?

A We stopped.

Q Were there any cars in front of you?

A No.

Q You were the No. 1 car?

A Yes. As far as my knowledge, // at the time we stopped, there was not one ahead of us.

Q While you were stopped, waiting for the light to turn green, was there any traffic going across the intersection, that is, on Cascade?

A Yes. It was coming across the—you know.

Q Now, when you were stopped there in the intersection, can you even tell me what direction you were going in, that is, north, south, east, west?

I can ask your husband after. If you don't know, just tell me you don't know.

A I really don't know. //

Q Was the traffic that had crossed that intersection coming from both directions, Mrs. Cox, or just one direction?

A Repeat the question.

Q Was the traffic that had crossed the intersection while you were waiting for that light to turn green // coming just from one direction or from both directions?

A As far as crossways, this way it was coming from both directions.

Q From both directions?

A Uh-huh; because you can go, you know—

Q Now, did the light in your direction ever turn // from red to green?

A First it turned yellow again.

Q In other words, the light turned?

A When we was in traffic, it was on caution to let us know that, you know, the light was turning green, I mean, turning to red; and then we stopped. Then the // traffic on the other side was proceeding, you know, in the direction they were going in, and the light changed back over for us to go back across on green; and as we proceeded on green, the other light had turned red.

Q The light on // Cascade had turned red; is that right?

A Uh-huh.

Q The light was green in your direction?

A It was green in our direction.

Q As you started across that intersection, Mrs. Cox, did you see the car you later learned to be driven by the Wofford girl?

A I didn't see the car until we had gotten approximately about halfway across, and I looked at the right, because the light was so close up

on me, her headlights, And I looked toward the right, and there she was. She was // just right up on us, and I screamed; and she hit us. We just started—the car started to spin in the middle of the street, and then she skidded almost another block, maybe a block and a half, before she could stop.

Q How wide was // Cascade at the intersection? Is it a two-lane street there or a four-lane street?

A It's a four-lane.

Q And Fairburn Road, is it a two-lane or four-lane?

A It's a four-lane.

Q So you saw the other car just before it struck you; is that right?

A Right. //

Q And she had her headlights on?

A Uh-huh.

Q Mr. Cox had his headlights on?

A Uh-huh.

Q This took place late at night or fairly early on Sunday morning?

A It was, more or less, I guess, morning, wasn't it?

Q Your husband may not agree with you, // but I want you to tell me when you think the accident took place.

A I guess about 9:30, maybe 10, somewhere along in there. I might not be exactly right, but it was at night.

Q Had you worked that particular day?

A Yes, we // had.

Q And where had you worked: at the Board of Education?

A Yes.

Q Where did your husband work?

A He worked for the Board of Education also.

Q Did ya'll work at the same place, same location?

A At the time that I was in that accident?

Q Yes. //

A Yeah.

Q And you had both worked that particular day?

A Yes.

Q Now, did your car that you were in when it spun around—did it spin all the way around?

A It spun around about two or three times.

Q Did it leave the road, or did it stay there in the // intersection?

A It left the road, because, you know, it kept straight about another block, block and a half.

Q But your car spun around but stayed there in the center of the intersection; is that right?

A Yes sir. I think it did stay in the // center of the intersection after it spun around.

Q Now, where, Mrs. Cox, was the car you were in struck? What part of the car was struck?

A On the door side; more or less on the door and the front.

Q Where you were seated?

A Uh-huh.

Q Did you get out // of the car at all while you were there at the intersection?

A When the ambulance came.

Q Did you have any conversation at all with Miss Wofford—

A Well—

Q —the driver of the other car?

A Miss Wofford came over to see if anybody // was hurt. She came to the door and asked if anybody was hurt. And I was bent over, and my husband was, you know, trying to help me. And he asked me was I hurt, and I told him my neck was hurt. And he asked—It was // another fellow. We didn't get his name. He asked if he could call—he hollered back and told

someone to call the police, that someone had gotten hurt, and call the ambulance.

Q Now, you're talking about another fellow. Was he // in her car?

A No. I imagine he had to be across in one behind her. I don't know where he came from, but he did say he saw the whole thing and that she did run the red light.

Q But you don't know who he is?

A No, because the // ambulance came, and the police wrote up the report. And then they told them to take me on to the hospital.

Q Well, have you ever looked at the police report?

A No.

Q Mrs. Cox, the police report lists several people that were // apparently passengers in the Wofford car. Did you see a number of people in the car?

A It was about four more girls; between, I guess, three to four, maybe five more girls that was with her.

Q Did you ever talk to any of // those girls?

A No. They sat on the curbside.

Q Did Miss Wofford ever tell you or did you hear her tell anybody else why the accident took place or why she didn't stop?

A No. He said—

Q What did you hear her say, about the accident, // if anything?

A She just said that she ran the red light.

Q You heard her say she ran the red light?

A She admitted running it.

Q Did she say why she ran the red light; anything at all?

A No.

Q Have you ever talked to Miss Wofford since this // accident?

A Yes, we did.

Q And when was that?

A We called her house before, because we received her number, and we gave her our number. // And we called her house and—to see if she had insurance, because we didn't get any of that information, // because the police told us to just go on to the hospital. And we called her house to see who, you know, her insurance name was in and everything.

Q And what did she say when you asked her about the insurance?

A She told // us what was—I think his name was Lloyd Wofford.

Q The police report lists Lloyd Wofford as the owner of the vehicle. Did she ever tell you who Lloyd Wofford was?

A No. I think it was her father. Now, I'm not sure; but I think she // said it was her father.

Q Did she ever tell you whether Mr. Lloyd Wofford had any insurance or anything?

A She told us he had some with State Farm. That's what she said.

Q Did you ever check with State Farm to see what they had?

A Yes, // we did, and they didn't have a listing for him.

Q Did you ever talk to Lloyd Wofford, Mr. Wofford?

A I can't recall directly talking with him. We talked with her mother.

Q Somebody at the Woffords' house said they had insurance // with State Farm, and you checked with State Farm, and they said they did not have insurance; is that right?

A That's right.

Q Did you ever have any other conversations with anybody at the Wofford's house about insurance other than that one? //

A Not to my knowledge, no.

Q Now, what was your name at the time of the accident: Jones?

A Uh-huh, yes.

Q Did you ever go to any traffic court hearing, Mrs. Cox?

A Yes, but we was given the wrong courtroom that the trial was going // to be in. And we was downstairs, and they were having the trial upstairs. So when we found out, we went downstairs to find out where was they having it. And they told us what room and everything, and it was over. This young man—his last // name was Thomas. I don't recall his first name, but he works there. His name was Thomas. He took us downstairs, and he looked it up for us. And we asked how did she plead, and he said she pled guilty. And I think they charged her \$25. //

Q You weren't there, but it's your understanding that the woman entered a plea of guilty?

A Right.

Q Now, Mrs. Cox, while you were at the intersection and still waiting to leave after the accident, did you feel that you were hurt // anywhere? Was there any place on your body that hurt you there at the accident scene?

A At that time, my back and my neck was really pulling.

Q Were you able to get out of the car on your own power?

A No. My husband assisted // me.

Q And were you taken from the accident scene by ambulance?

A Yes.

Q Now, were you on some sort of stretcher in the ambulance, or were you seated up?

A I was on the stretcher.

Q Was your husband hurt in any way at the time?

A He // hit his knee, but he didn't complain about it.

Q Was anybody else hurt in the accident, as far as you know, other than yourself?

A No.

Q In other words, after they came, the only person they took away for medical // attention was you?

A Right.

Q Miss Wofford, I gather, was not hurt in the accident?

A No; because she got out of her car to come to ours.

Q Now, where did the ambulance take you, ma'am?

A It was Holy Family at that time.

Q It's now South // Fulton; is that right?

A Yes.

Q Do you know the name of the doctor that saw you at Holy Family?

A No; because that was a private hospital at that time.

Q Did some doctor see you in the emergency room?

A Yes, he did.

Q What did they do for you in the emergency room, ma'am?

A They gave me a shot and a pill and gave me some pills in a bag.

Q Did the complaints that you gave them, the people in the emergency room, were they directed to your neck and your // back?

A Yes.

Q Did you complain about any other area of your body other than the neck and back?

A My legs was hurting a little, and they x-rayed my knee. I think it was my knee they x-rayed.

Q Which knee was that, ma'am?

A I think // it was the right one.

Q Did that knee clear up in due time?

A Yeah. He said it was bruises. Nothing showed up on the x-ray.

Q And I take it they didn't find any broken bones in any other part of your body; is that right?

A Right.

Q Nobody // has ever told you that you had any broken bones; is that right?

A No.

Q Now, how long were you at the emergency room?

A I guess about two hours.

Q When you left the emergency room, how did you leave?

A I called my brother-in-law. // It's my sister-in-law's fiancé.

Q What is his name?

A I know his last name is Jolly. Jake. We call him Jake.

Q Anyway, this fellow by the name of—Jolly, you say is his last name?

A Uh-huh.

Q He came and picked you up?

A I think // he picked us up.

Q The person that you refer to as Jolly and the person your husband refers to as Jake, is that all the same person?

A Uh-huh.

Q Where did he take you?

A To be alone, where we had started in the beginning.

Q And // where did you live at the time?

A 353 Lenardo Drive.

Q Lenardo?

A Uh-huh.

Q Was that a house or an apartment?

A That's a house.

Q And who were you living with at the time of the accident?

A My mother.

Q Your mother?

A Uh-huh.

Q And // your oldest two children?

A Uh-huh.

Q Anybody else besides your mother and your two children?

A My sister and her two kids.

Q What's your sister's name?

A Gertie.

Q What's her last name?

A Wilkinson.

Q Where does she work?

A She was unemployed at the time. //

Q Let me ask you this: Can you give me a little better idea of what

Mr. Jolly's relationship is to you? You something about a brother-in-law.

What is he?

A Okay. He's my sister-in-law's fiancé.

Q When // you say "sister-in-law," which sister-in-law?

A My husband's sister.

Q Your present husband, Mr. Cox?

A Right; his sister.

Q And what is her name?

A Mary.

Q Mary Cox?

A Uh-huh.

Q And she's engaged to this Mr. Jolly?

A Not to my knowledge.

Q Not // anymore?

A Not to my knowledge. I don't know about an engagement.

Q Well, Mr. Jolly was Mary Cox's boyfriend back in 1995, the  
time of this accident?

A Uh-huh.

Q So, when he picked you up at the Holy Family // Hospital,  
about what time was it?

A Oh, it was after 12.

Q And he took you and Mr. Cox to where you were going to go in the first place?

A Yes.

Q Now, how far was that from the intersection where the accident // took place?

A It was on Fulton Industrial.

Q Fulton Industrial Road?

A Boulevard.

Q Boulevard, rather?

A Uh-huh.

Q Now, how long did you stay there?

A We stayed until that morning. It was in the morning. See, I didn't want to go directly // home then, because I didn't want my mother to know I had been in an accident, because she would get all upset because my clothes was torn.

Q When did you finally go home?

A We went that same morning.

Q That morning?

A Uh-huh. //

Q At the time of this accident, Mrs. Cox, where did your husband live?

A 587 Fletcher Street.

Q How did you get from Fulton Industrial Boulevard back to your mother's house?

A I called my brother.

Q You called your brother?

A Uh-huh. //

Q What is his name?

A Ronald.

Q What's his last name?

A Wilkinson.

Q Where does he work?

A Simmons Bedding Company on Jones Avenue.

Q Simmons?

A Uh-huh.

Q Was this place that you and your husband, now husband, went to out on Fulton Industrial Boulevard, was that a house, an apartment, or what?

A It was a motel.

Q A motel?

A Yes.

Q What was the name of the motel?

A Was that Days Inn? It was either Days Inn or Motel Six.

Q Either Days Inn or Motel Six?

A Yes. I think it was Days Inn.

Q So ya'll went there, stayed there, and then in the morning called your brother Ronald, who came and picked you up and took you home?

A Right.

Q Now, when was the next time, Mrs. Cox, that you saw a doctor or had any medical attention // after this, you know, after this Holy Family and then the next day came?

A Well, it was like—I think it was that next day. It was on a Friday night, I believe, and it was that Saturday morning, because after I had // gone home, they didn't give me very much pain pills that night.

Q Let me interrupt you. Did the pain medication that they gave you, did it do any good?

A Yes.

Q So you believe that the accident took place on a Friday?

A Yes.

Q And I'm not trying to confuse you at all, but if the police report has the accident, the day of the week, Sunday, do you believe that just is not true?

A It couldn't be Sunday, because we had gotten off from work. And that was, like, // Friday. We had just gotten paid.

Q He just filled it out wrong; is that right?

A I imagine so.

Q Had you or Mr. Cox had anything to drink that night before the accident?

A He had a beer that day, earlier that day.

Q He hadn't // had anything more than a beer before the accident?

A No. My husband does not drink and drive.

Q Do you know whether or not this woman, Wofford, had anything to drink?

A Not to my knowledge.

Q Now, the next morning, when you went back // to your mother's house, did you seek any medical attention that Sunday?

A Yes.

Q Where did you go?

A Grady Hospital.

Q How did you get to Grady Hospital?

A Jake, Mr. Jolly again.

Q When you went to Grady Hospital that // Sunday, Mrs. Cox, what did you tell the people at Grady Hospital was bothering you?

A I told them—Well, at the time I went, I went for asthma then. It was a wheezing; because I used to have asthma when I was very // small. But I hadn't had it in about ten years before the accident.

Q Were you taking any medication for the asthma?

A Not within ten years before the accident.

Q So it had been ten years before the accident?

A I would // say about ten years.

Q Have you had any problems with asthma since the accident?

A Yes.

Q Has any doctor told you that they thought the accident had anything to do with your asthma problems?

A Yes. As a matter of fact, that same // day, because they had to give me 8 pints of fluid.

Q Who is this? Grady Hospital?

A Yes, the doctor that saw me.

Q Do you have any idea what his name was?

A It was a she.

Q Do you have any idea what her name was? //

A No.

Q You just know you saw a female doctor—

A Yes.

Q —at Grady? And did she treat you for anything that day other than the asthma problem you were having?

A No, because when I first went in, that was the major thing they treated me // for, because I couldn't catch my breath.

Q You went down there on that Sunday and told them you were having trouble breathing, and that's what they treated you for?

A Uh-huh.

Q Did you complain at all about any pain in your neck or your back?

A I // told her that I had gone to Southwest and that they treated me for back and neck injuries; And I woke up, and I was wheezing real bad. I couldn't catch my breath. I was still aching, but the major problem then was the wheezing, // because I couldn't catch my breath.

Q Were you having any problems with this while you were at the emergency room at Holy Family?

A Breathing?

Q Yes, ma'am.

A No, sir.

Q Did you ever go back to Grady again after that date?

A Several // times.

Q When you went back to Grady, were you treated for anything other than your asthma problems?

A I've had treatment there for my back also.

Q Do you know when that was?

A I can't recall the exact dates.

Q Do you know how long after the accident you actually had any treatment for any back problems?

A Well, I had one about a week before Christmas.

Q This took place in September of 1995. You're talking about Christmas // of '95?

A No. I'm talking about Christmas of '97.

Q You've been back to Grady a week before Christmas of '97?

A Uh-huh.

Q And when you went back to Grady, what did you tell them was wrong with you then?

A I // was complaining of my back.

Q Now, you listed in your interrogatory answers a Dr. Alfred Tulkoff—

A Uh-huh.

Q —who's got an office on Gordon Road; is that right, ma'am?

A Uh-huh.

Q When did you see Dr. Tulkoff?

A I think it // was that next week, because I continued to have, you know, the problem. And I had gone to Grady for it, and they gave me pain medicine. But he told me I would have to seek a private gynecologist and, you know, doctor // for my back, 'cause they couldn't issue that type of medication that it was taking for the pain.

Q Do you know Mrs. Cox, whether Dr. Tulkoff has any sort of specialty or whether he specializes in one sort // of thing or another or whether he's a general practitioner?

A I really don't know.

Q Had you ever been to see Dr. Tulkoff before this time?

A No.

Q Who gave you Dr. Tulkoff's name?

A Well, I had passed there several times, and // I noticed his office on the right side; And this friend—well, he's a supervisor for the Board Of Education, because he knew I was having so many problems; And he told me I should go and see Dr. Tulkoff, that he // was a good doctor, and that he probably would be able to help with it.

Q I've got a copy of a form that Dr. Tulkoff filled out; at least it's got his name on here. Apparently, he filled it out; And on this form, Mrs. Cox, // he lists the first day he saw you and examined you was September 23, 1995. That would have been, I guess, that Monday?

A Uh-huh.

Q Did you go see him that Monday?

A Like I say, everything was happening at one // time. I couldn't give you exact dates.

Q Then he saw you on September 30, 1995, according to this report; about a week later; and then about two weeks or so later on October the 17<sup>th</sup>, '95. Are those the only three times that you've seen Dr. Tulkoff?

A No. I've been to him several times, cause he treated me for asthma, because I had gone to see him once for my back. And I caught the asthma while I was there. And // he gave me a shot to relieve it, some type of asthma shot.

Q So he not only treated you for your back, but he also treated you for your asthma condition?

A Yes.

Q Did Dr. Tulkoff ever tell you what he thought caused this asthma // condition to come back that had been gone for ten years?

A He felt that I had probably gotten excited from the accident. He say it happen sometimes.

Q He felt that you had gotten excited, and that had caused it?

A Uh-huh.

Q Are you having problems with asthma now?

A Yes; I still have it. As a matter of fact, I had an attack last night.

Q Are you taking any medication for those problems?

A Yes. Grady gave me some.

Q How often you do you take that // medication?

A Only when I have asthma.

Q Well, how often is that, generally?

A Once a month, once a week, or once every three months. It all depends, because it's not—like, certain times of the season, seems like I have it worse. If // it should rain, the air gets stuffy; sometimes my breath

will get short. If I get tensed up, seems like if I start hurting real bad, then I will start wheezing.

Q Mrs. Cox, did you ever see Dr. Tulkoff at all during 1996?

A Yes.

Q Did you ever see Dr. Tulkoff at all during 1997?

A I think so. I have to say I think, because, like I said, I can't be specific on all the times I actually saw him and be accurate // with it.

Q You know you've not seen him this year; is that right?

A Right.

Q And I believe that you have seen Dr. Tulkoff since March of 1996?

A Yes, I believe I have.

Q But, I take it, you yourself did not have any copies of any // of those bills, or you haven't given your attorney copies of any of those bills for 1996 or 1997?

A Not as I remember.

Q Now, the Monday after the accident, would that have been your next // regular workday?

A Yes, it was.

Q Did you go to work that day?

A No.

Q Did you go to work at all?

A I was not able to, not with the duties I had to perform.

Q When was the first day that you went back to work?

A I was scheduled to go // back? I was scheduled to go back in  
July.

Q Of 1996?

A Uh-huh.

Q And you didn't go back from the day of the accident, and then  
you were scheduled to go back in July of 1996. And when did you // finally  
go back to work?

A 18<sup>th</sup> of November.

Q Of 1996?

A No; of this year.

Q Of '97?

A 18<sup>th</sup> of November of last year, I mean, cause this is '98.

Q So from September 21<sup>st</sup>, 1995, // you were out of work or didn't  
go back to work until November 18, 1997, over two years?

A Right.

Q Now, you were paid \$5,000 by the Travelers under your—

A I didn't add it up. They said // it was \$5,000.

Q After that, those unemployment benefits ran out, were you receiving any other unemployment benefits from any // other source?

A I received unemployment.

Q You received unemployment?

A Yes.

Q And you received money from the Travelers Insurance Company; right?

A No, unh-uh. I received money from the Travelers Insurance Company // because I didn't even really think about the fact that I probably could draw unemployment. I started drawing unemployment after I had the baby. Oh, it's just a long story.

Q You didn't apply for any // unemployment while you were getting paid by the Travelers Insurance Company; is that what you're telling me?

A I applied for it, but I couldn't receive it because I was not able to work.

Q Then when did you start drawing unemployment compensation?

A If I'm not mistaken, it was after the last treatment. I couldn't be exactly accurate on that either because I had to be able to work in order to draw it. It was after the // baby was born.

Q Mrs. Cox, the baby is 14 months old; is that right?

A Uh-huh.

Q Now, can you give me that child's birthday?

A He was born the 23<sup>rd</sup> of September.

Q September 23<sup>rd</sup>, 1996; is that right?

A Uh-huh.

Q And it was after that birth that you started receiving unemployment benefits?

A Uh-huh.

Q And you // continued to draw unemployment until you went back to work in November of 1997; is that right?

A No. I didn't draw it that long.

Q How long did you draw it?

A I guess for around three months, eight weeks, eight to ten weeks, // something like that. It wasn't long.

Q But you didn't work anywhere at anything during that period from the date of the accident in '95 up until you went back to work at the Board of Education in // November of '97; is that right?

A No, because I—Grady Hospital.

Q You worked at Grady Hospital?

A Uh-huh.

Q When did you work at Grady Hospital?

A That was last year.

Q When last year?

A I think it was in April.

Q For how long? //

A Well, I was fired the other day; almost two weeks now.

Q You went to work at Grady last spring doing what?

A Clerk, clinic clerk, answering the phone, making appointments.

Q Was that a full-time, 40-hour-a-week job?

A Yes.

Q And who was your // supervisor at Grady?

A Beth Spelman, S-p-e-l-m-a-n.

Q And what's her job position down there?

A She's a supervisor.

Q Any particular shift?

A 11 to 7.

Q 11 o'clock at night till 7 o'clock in the morning? //

A Uh-huh.

Q Did you work in the emergency room?

A Surgical emergency.

Q In the surgical emergency?

A Yes. Uh-huh.

Q You say you continued to work that 11 p.m. to 7 a.m. shift // up  
until you were fired about two weeks ago?

A Uh-huh.

Q Did anybody give you any reason why you were fired?

A I had been out too much.

Q They say you had been out of work too much?

A Yeah, because I had been ill for 22 // days, and you can't be ill  
for over eight days.

Q When they say ill for 22 days, they mean 22 days from the date  
you started working there up until the date they let you go?

A Right.

Q Then in November of last year, in addition to your job at Grady, you went back to work at the Board of Education?

A Uh-huh.

Q And are you still working at the Atlanta Board of Education?

A I'm there now, yes.

Q Are you doing custodial work?

A Yes.

Q And are // you doing the same thing that you were doing back when the accident took place?

A Yes. It's similar to the same thing.

Q Who is your supervisor at the Atlanta Board of Education now?

A I don't have a supervisor there. //

Q Do you have anybody to report to, I mean, a boss somewhere to tell you where to go and what to do or something?

A No. Well, the fellow that's always over is the engineer.

Q What is his name?

A We call him Otis. I think // his name is Montgomery.

Q When is the last time you have been to a doctor, Mrs. Cox?

A About two weeks ago.

Q And who did you go see?

A One of the doctors there in the emergency clinic.

Q At Grady Hospital?

A Uh-huh. //

Q And what was the reason that you went down to Grady? Why did you go down to see some doctor two weeks ago?

A My back was hurting.

Q When you went down to Grady two weeks ago in the emergency room, did you fill out some form // or tell somebody and they put on the form that your back bothered you?

A Uh-huh.

Q Are you having any problems now or today with your back at all?

A My back always bothers me.

Q Were you ever treated at any time before this // accident in September of 1995 for any back problems?

A No, I never had before.

Q How long after this accident, Mrs. Cox, did you stop having any problems with your neck?

A It had to have been up in '96. And certain ways at times, if I lay or I sit, I can feel a pull, like, in my neck and in the lower parts of my back.

Q Where do you and your husband live at the present time, Mrs. Cox?

A On Lenardo Drive.

Q Is that // in a house or apartment?

A It's a house.