

1 them that morning. There was a few down on my shoulders.

2 Q. Have you ever had surgery to your neck?

3 A. Yes.

4 Q. When?

5 A. In August 1989.

6 Q. Can you tell the Court about that surgery based
7 on your experience and involvement in that surgery.

8 A. I had lost the use of my right side due to two
9 underground mining accidents and an automobile accident,
10 which I was rear-ended at a red light, and I couldn't go up
11 steps. I had to go up steps sideways. I basically had
12 lost total use of my right side. I put the surgery off for
13 ten years because I was terrified of the surgery because my
14 dad was paralyzed from the neck down for twenty-one years,
15 and I didn't want the surgery.

16 Q. You ultimately --

17 A. I was afraid of it.

18 Q. You ultimately got the surgery, though?

19 A. I was told at the Mayo Clinic that "If you step
20 off a curb, you're going to be paralyzed," in those words,
21 "and you have got to have it."

22 Q. What kind of surgery did you have?

23 A. They went in through the anterior here and
24 removed two vertebrae and disks, and ground up material and
25 put it back in there. They didn't take the whole vertebrae