

1 Q. Do you recall discussing your medical condition  
2 with Rick Sahli back in October?

3 A. Yes, I certainly do.

4 Q. Back on December 13th of 2000 was there any  
5 medical devices or items in your back or neck?

6 A. What they had done -- The answer is yes. What  
7 they had done during the surgery is cut out the back of  
8 my -- five of my vertebrae, completely out. I can reach in  
9 here and feel my spinal cord sheath. I'm terrified of  
10 being hit in the head or in the neck because I've been told  
11 it was fatal. I have no protection around the spinal cord  
12 anymore because they cut it away, five levels. Mr. Sahli  
13 knew that. In my deposition --

14 Q. That's a different question. Do you have any  
15 medical devices or items in your neck or back?

16 A. Yes. What they did with the remaining part of  
17 the vertebrae is they drilled two holes in five vertebrae,  
18 and they put two titanium-vanadium plates in my neck, kind  
19 of off to the side, and ten bolts an inch and a quarter  
20 long made out of the same titanium and vanadium. So I have  
21 two plates in my neck and ten bolts holding those plates to  
22 what's left of the vertebrae, and the back of the vertebrae  
23 in the back of my neck is cut away and exposed.

24 Q. Can you describe any limitations or restrictions  
25 of mobility that you may have had to your neck and shoulder