

Entry Molina Deposition

DEPOSITION SUMMARY OF JESSIE MOLINA

I am a 25-year-old resident of Jamner County, Major. I live a little less than four miles north of the scene where Terry O'Brien was killed on June 16, 20XX-2. I drive up and down Pioneer Road on a regular basis, not only to go to and from my house, but also in the course of my work. I have been employed as a school bus driver with the Pioneer School District for about two years.

On June 16, 20XX-2, sometime between 12:00 p.m. and 12:30 p.m., I was driving north on the Pioneer Road toward my home. I know the exact spot in the construction zone where Terry O'Brien's car left the road, due to my familiarity with the scene. I knew that the road crew had just put new asphalt blacktop on the road surface. As it turned out, I was there at the scene only about five minutes before Terry O'Brien was killed.

I saw one "Loose gravel" sign about 3-4 miles to the south of the scene where Terry O'Brien was killed. There were no other signs related to the road resurfacing work either to the north or the south of the accident scene at that time. Specifically, there were no signs advising drivers to reduce their speed or of an abrupt lane edge.

The road crew was not working on Pioneer Road on June 16, 20XX-2 in the minutes prior to the accident. There was a sharp drop-off between the edge of the new blacktop surface and the road shoulder in the construction area. I would estimate the drop-off to be around six inches.

Later, on the same day that Terry O'Brien was killed, "Abrupt lane edge" signs and "25 m.p.h." signs were put up on both sides of the construction area. I am positive that this was done after Terry O'Brien was killed, not before.

I was frightened to drive down Pioneer Road during the construction, as the drop-off from the paved surface to the side of the road was dangerous. The shoulder of the road on one side drops off sharply. If you went too far to that side, you would likely roll into the ditch. The other side of the road has many sharp jagged pieces of rock, some as big as a football. In the glare of the noonday sun, it is hard to see exactly where it drops off. This is particularly so in that there was no striping of any kind on the road that day.

Everybody that lives out here in my area knows what happened to Terry O'Brien and feels that the County did not have the right signs up that day, then tried to cover up their tracks after the fact.