625 Hill and Brook Quincy, Illinois 62305 (217) 224-5362 don@donhess.org

CURRICULUM VITAE

EDUCATION

QUINCY UNIVERSITY Quincy, Illinois

Completing Master of Science in Educational Administration

UNIVERSITY OF NEBRASKA Lincoln, Nebraska

Bachelor of Arts, Oral and Written Communication, May 1992.

Also post-graduate work in Vocational Education.

OKLAHOMA STATE UNIVERSITY Stillwater, Oklahoma

Post-graduate work in Vocational Education.

RELEVANT EXPERIENCE

6/94 - Present JOHN WOOD COMMUNITY COLLEGE Quincy, Illinois

Director, Transportation & Public Safety Programs

Design, organization, and implementation of Truck Driver Training program from "ground up." Responsible for curriculum development, equipment acquisition, facilities and personnel management, and all other related activities. Also responsible for administration and management of all Fire Science

and Law Enforcement programs.

9/92 -1/94 CENTRAL OKLAHOMA AREA VO-TECH,

CENTER FOR TRANSPORTATION AND SAFETY EDUCATION Drumright, Oklahoma

Lead Instructor

Responsible for conducting classes teaching all phases of truck driving, taking students through the CDL permit process to fully endorsed license. Teaching environment included classroom, private range, and open road. Actively participated in curriculum development, and skill assessment procedures and criteria. Left program for semester of full-time work on M.S., and to explore career options.

1/90 - 9/91 **BUFF 'N STUFF CAR CARE** York, Nebraska

Owner

Opened shop junior year in college, Sold business at a profit after 21 months of operation in order to fully concentrate on final year of school.

5/89 -12/89 SAPP BROTHERS TRUCK STOP York, Nebraska

Assistant Manager / Shift Supervisor

Trained staff in all aspects of jobs, served as night shift supervisor.

4/85 -2/87 **NIELSEN TRUCKING, INC.** York, Nebraska

Over The Road Driver

Operated under lease to and authority of Sunflower Carriers, York, Nebraska in 48 contiguous states. Qualified for ATA 10 year safety award.

5/83 - 4/85 GILBERT CENTRAL CORPORATION Grand Island, Nebraska

Heavy Equipment Operator / Truck and Safety Superintendent

Operated various types of heavy equipment as required, served as truck and safety superintendent.

9/80 - 5/83 SHUPE BROTHERS TRUCKING Duncan, Nebraska

Over the road driver

Delivery of salt and grain within the greater midwestern area.

2/78 - 8/80 LANGE AND RUNKEL CHEVROLET Redlands, California

New car sales manager

Began with dealership as sales associate, promoted to management after twelve

months. Responsible for orientation and training of new associates.

1/71 -2/78 LONG TRANSPORT, INC. Los Angeles, California

Director of Safety / Driver Trainer

Began as transport driver. Promoted to lead driver/trainer in 1973, safety director in

1976. Implemented new safety and loss prevention programs.

ADDITIONAL TEACHING EXPERIENCE

UNIVERSITY OF NEBRASKA-LINCOLN Lincoln, Nebraska

Assistant Supervisory Instructor

Conducted three speech communication classes of 60 students. Supervised six instructor assistants, and managed speech communication lab. Responsible for grading and evaluations for all students and assistants on written assignments, as well as verbal presentations. Ensured that University and department guidelines were followed.

OTHER ACTIVITIES AND AWARDS

Judge, 1993 State VICA competition, Tulsa, Oklahoma

Judge, 1993 State Truck Driving Championship, Oklahoma City, Oklahoma Judge, 1995 and 1999 State Truck Driving Championships, Chicago, Illinois J. Robert Kerrey 1988 U.S. Senate campaign; Central Nebraska manager. American Trucking Association Million Mile Safe Driving Award, Presented 1987 Named to "Who's Who Among America's Teachers," 2003, 2004, 2005

PROFESSIONAL ASSOCIATIONS

Member, American Vocational Association

Member, Illinois Trucking Association

Founding Board Member, Illinois Skill Standards Credentialing Council

Active member, Midwest Transportation Association Active member, Illinois Transportation Association.

Charter member. Driver Training and Development Alliance

Past President, National Association of Publicly Funded Truck Driving Schools.
Past President, Oklahoma State University Vocational and Industrial Association.
Board Vice-Chair and Evaluation Team Leader, Professional Truck Driver Institute Founding member, Illinois Community College Commercial Driving Programs

PERSONAL DATA

54 years of age, health excellent, married 32 years, one son.

LICENSES

Illinois Class A Commercial Driver License, endorsed for doubles, triples, tankers, passenger, motorcycle, and hazardous material. Valid through February, 2011. Current DOT physical.

Donald L. Hess / Case List (Through March, 2008)

February 2008 Turner & Sweeney (John E. Turner) Kansas City, MO 64131

Brandy Curtis v. Barber and Yellow Transportation

A man was fatally injured after being struck by vehicles, as he stood on the shoulder of an Interstate highway, following a

rear-end collision. Retained by Plaintiff

September 2007 Frederick & Hagle (Philip W. Peak)

Curtis Hartlep and Julie hartlep vs. Muller-Pinehurst Dairy, Inc.

A truck driver was injured while attempting to off-load at a receivers dock.

Retained by Plaintiff

August 2007 State of California Dept. of Transportation (CalTrans) Sacramento, California 95812

(State attorney: Steve Dadaian)

Pavlock v. State

A tractor-trailer operator pulled into the path of oncoming traffic, and held the state liable for lack of traffic control devices.

Retained by Defense, deposition given

July 2007 State of California Dept. of Transportation (CalTrans) Sacramento, California 95812

(State attorney: Rick Mitchell)

Andreyuk v. State, et al.

Summary: A car pulling onto an Interstate highway forced traffic into the path of higher speed traffic, resulting in an SUV

rolling multiple times. The SUV operator held the state responsible for highway markings.

Retained by Defense

June 2007 Capron & Avgerinos, P.C. (Stephen Smalling), Chicago, Illinois, 60603

Austin Van Gorden v. Dubuque County Fair Assoc., et al.

Summary: An individual, was injured while helping load a flatbed trailer, and the vehicle was moved without warning.

Retained by Plaintiff

May 2007 Goldberg Segalla (David Osterman), Princeton, New Jersey 08540

Hodgson Russ (Julie Kennedy), New York, New York, 10165

Melba Zambrano et al. v. CSX Transportation, et al.

Summary: A truck driver was struck by a train and fatally injured while directing another truck driver, who was hooking up

a container chassis near rail tracks .

Retained by Defense, deposition given

June 2006 Muldoon and Muldoon (Michael Muldoon), Chicago, IL 60601

Tracy Powell v. Dean Illinois Dairies, et al.

Summary: A car entering the roadway was struck by a tractor-trailer whose operator was in excess of hours of federal

service nregulations.

Retained by Plaintiff, deposition given, testified at trial

October 2006 State of California Dept. of Transportation (CalTrans) Sacramento, California 95812

(State attorney: Bruce McGagin)

Hamilton v. State, SR 127, Inyo County, California

Summary: A tractor-trailer tanker driver maintains the State is responsible for a crash where he lost control of his vehicle

and it rolled over.

Retained by Defense, deposition given, testified at trial

August 2006 Mitchell, Yokel & Roach, LLC, Greenville, South Carolina 29603

Ted Harris d/b/a Harris Trucking v. PP&S

Summary: A dump truck driver rolled his truck over, and held the loader operator responsible.

Retained by Defense, deposition given, testified at trial

July 2006 Santilli & Vano (Fred Vano), Chicago, Illinois, 60602

Estate of Love v. Charles Minton

Summary: A tractor-trailer pulled out into the path of oncoming traffic, and was struck broadside.

July 2006 Peter A. Law, P.C., Atlanta, Georgia 30326

James Dewayne Banner and Tina M. Banner v. Comtrak, Inc., d/b/a Comtrak Logistics,

Jimmy Lee Bates and Great Western Casualty Company

Summary: A dock worker was seriously injured when a tractor-trailer backing into a dock crushed his head between the

trailer and dock wall.

Retained by Plaintiff, deposition given

June 2006 The Healy Law Firm, Chicago, Illinois, 60602

Stacey J, Butler v. Stephen Eberting, et. al.

Summary: Ms. Butler was seriously injured when her car was struck by a lumber truck from the rear.

Retained by Plaintiff, deposition given

February 2006 Patton & Ryan, LLC, Chicago, Illinois 60611

Jason Lawson v. Swift Transportation and Thomas Berliant

Summary: Mr. Lawson struck a flatbed trailer from the rear, and was fatally injured.

Retained by Defense, deposition given

December 2005 McCandlish & Lillard, Fairfax, Virginia 22030

Estate of David Mardsen v. Capitol Building Supply Company

Summary: A bicyclist was fatally injured when struck by a truck owned by the defendant.

Retained by Plaintiff, deposition given

December 2005 Rex Allen Law Firm, East St. Louis, Illinois 62201

Stephens v. Tri-County Trucking

Summary: A semi tractor-trailer traveling at excessive speed lost control and hit an auto, which then crossed traffic lanes and was struck by a pickup truck, and rolled numerous times. Numerous drivers and passengers were severely injured.

Retained by Plaintiff

November 2005 State of California Dept. of Transportation (CalTrans) Sacramento, California 95812

(State attorney: Doug Johnson) Rodriguez v. State of California

Summary: A truck driver maintained that the State did not properly sign a curve on a mountain road, and that as a

consequence, he lost control of his truck and was injured.

Retained by Defense, deposition given

August 2005 Madden & Orsi Law Firm, Wichita, Kansas 67202

Estate of Chad A. Lee v. Roy E. McFarland and Mid-Continent Trucking Co. Summary: Mr. Lee was fatally injured when his disabled vehicle was struck by a semi tractor-trailer.

Retained by Plaitiff

August 2005 Maisel & Associates, Chicago, Illinois 60601

Andreina v. Walt's Trucking Co., et al.

Summary: A highway worker was injured when he got caught under a tractor-trailer.

Retained by Defense

June 2005 Michling Hofmann Vinton Plaza & Wick, Woodstock, Illinois 60098

Altman v. Weeres, et al.

Summary: Mr. Altman was stopped at a toll plaza paying his toll, when struck from behind by a tractor-trailer whose driver

failed to brake or reduce speed as he approached.

Retained by Plaintiff

May 2005 Richardson, Stasko, Boyd & Mack, LLC, Chicago, Illinois 60603

Rebecca White, Administrator of the estate of Daniel Mixon, v. Ihor Schoriny,

Vladimer Chen, and Unick, Inc.

Summary: Mr. Mixon was fatally injured when his vehicle struck a tractor-trailer being driven at low speed on an Interstate

highway.

March 2005 Travis G. Maisel, Chicago, Illinois 60606

Dart Transit v. Lynne Haugstad

Summary: Ms. Haugstad is an additional defendant in the Krohn v. Dart Transit case from October 2003.

Retained by Defense, deposition given

March 2005 The Benson Law Firm, Kirksville, Missouri 63501

David E. Matthew and Sheila G. Matthew v. Behlen Mfg. Co.

Summary: Mr. Matthew was injured while helping a truck driver unload a flatbed at his place of employment.

Retained by Plaintiff

February 2005 Edward C. Cosgrove Attorneys at Law, Buffalo, New York 14202

Bobak v. B-Right, et al.

Summary: A tractor-trailer driver was injured when the trailer in another driver's oncoming tractor-trailer rig turned over,

and lost it's load, which struck the plaintiff's tractor-trailer head on.

Retained by Plaintiff

February 2005 Copeland, Finn and Fieri, Ltd., Chicago, Illinois 60601

Estate of Eddie Boyd, deceased, vs. Miguel Chavez, et al.

Summary: A man was fatally injured after being run over by a tractor-trailer.

Retained by Plaintiff

November 2004 Edward C. Cosgrove Attorneys at Law, Buffalo, New York 14202

Lahren v. Boehmer Transportation Co.

Summary: A woman was injured when her car was struck by a tractor-trailer in an intersection.

Retained by Defense

November, 2004 Kiesel, Boucher, Larson, Beverly Hills, California 90211

Torpin, et al. v. Bogie, et al.

Summary: A woman and her child were fatally injured when their car was forced off the road and into an illegally parked

tractor-trailer on a California freeway.

Retained by Plaintiff

October 2004 McCullough, Campbell & Lane, Chicago, I Illinois 60601

Janease Armstrong v. David Abercombie, et al.

Summary: Ms. Armstrong was injured when asked by Mr. Abercombie to assist him in adjusting the sliding axles on the

trailer of his tractor-trailer.

Retained by Defense, deposition given, testified at trial

October 2004 Knopik Varner Moore, Tampa, Florida 33602

Karen Golden v. Bridgestone/Firestone North American Tire, LLC, Morgan Tire and Auto, Inc., d/b/a Tires

Plus, and Vanguard Services, Inc.

Summary: A woman was seriously injured when a truck tire was thrown out of a trailer being unloaded at a tire store

where she was a customer, hitting her and causing serious injuries.

Retained by Plaintiff, deposition given

September 2004 MacCabe and McGuire, Chicago, Illinois 60601

Ivan Cisco, et al v. CRST, et al, Daniel J. McClone, et al v, Fredierick O. Johnson, et al;

Jurgenson v. CRST, et al and Miller v. CRST, et al.

Summary: Numerous vehicles were destroyed and people injured in a collision resulting from a tractor-trailer stopping on

railroad tracks, and being struck by a train.

Retained by Defense (Canadian National Railway Company)

September 2004 Cirvello Carlson & Mentkowski, Milwaukee, Wisconsin 53203

J. Stenberg v. B. Carr

Summary: A truck driver was injured when he was run ov er by another truck driver, as he was attempting to assist the

driver adjust his tandem trailer axles.

Retained by Plaintiff

October 2004 Snead & Mims, Fairfax, Virginia 22030

Leary v. T. Byrum, et al.

Summary: Mr. Leary was fatally injured when his vehicle was struck by a tractor-trailer, whose operator stated he was

asleep behind the wheel at the time of the crash.

Retained by Plaintiff

May 2004 Asperger and Caraher, Chicago, Illinois 60601

Richard Nash v. Clint D. Dillon and Annette Holdings, Inc. d/b/a TMC Transport

Summary: A tractor trailer struck the rear end of an automobile at high speed, causing numerous injuries.

Retained by Plaintiff

May 2004 Robert B. Patterson, Ltd., Chicago, Illinois 60601

Treest v. Auto Truck Transport

Summary: A truck driver was severely burned when his tractor caught fire and burned after being struck by another

tractor-trailer.

Retained by Plaintiff, deposition given

May 2004 Parente & Norem, P.C., Chicago, Illinois 60601

Hotz v. Konstruction

Summary: Mr. Hotz, a pedestrian, was struck by a dump truck while crossing a street.

Retained by Plaintiff, deposition given

April 2004 Jamie M. Trapp & Associates; Chicago, Illinois 60601

Skrabutenas v. Vulcan Materials Co.

Summary: Mr. Skrabuttenas was injured when he jumped from a tractor- trailer while it was jackknifing on an icy quarry

road.

Retained by Plaintiff, deposition given

February 2004 Edward C. Cosgrove, Buffalo, New York 14202

Lahren v. Boehmer Transportation Corporation

Summary: A tractor-trailer driver was injured when a load of steel came off another tractor-trailer and struck his truck.

Retained by Plaintiff

October 2003 Lowery & Associates, Chicago; Illinois 60606

Joseph Pusateri, Jr, et al. v. Lance Allen Ellis, et al.

Summary: Mr. Ellis was operating a semi tractor-trailer on a city street in Chicago, Illinois, when his vehicle was struck by

another semi tractor-trailer which was backing onto a dock.

Retained by Defense, deposition given

October 2003 Michael J. Warner & Associates, Rock Island & Chicago, Illinois 60610

Patricia Krohn (Adm. For Wendy Potuznik, Deceased) v. Dart Transit, et al

Summary: Ms. Potuznik was a passenger in an automobile on an Interstate highway, and was fatally injured as a

consequence of a chain reaction crash involving 10 automobiles and two tractor-trailers.

Retained by Plaintiff, deposition given

April 2003 Oliver B. Dickens, Attorney at Law; Simsbury, Connecticut 06070

James Glynn v. Clyde E. Miller, Jr., et al.

Summary: Glenville Connor had stopped his automobile transport truck in the breakdown lane of an Interstate highway to rectify a chain dragging from his vehicle. A pickup truck operated by Jeffrey Bruno sw erved in response to a tractor-trailer operated by Clyde Miiller, which had entered Bruno's lane. Mr. Bruno's pickup truck then impacted the rear of the auto

transport in the breakdown lane, severing Mr. Glynn's arm, and causing other serious injuries.

Retained by Mr. Connor's defense, deposition given, testified at trial

March 2003 Fred A. Truglio & Associates; Chicago, Illinois 60606

Jason Armstrong v. Ronnie Featherstone and Grand Island Express Trucking

Summary: Mr. Armstrong was seriously injured when a vehicle in which he was a passenger was struck by a tractor-trailer

being re-positioned on a dock by Mr. Featherstone.

January 2003 Hinshaw & Culbertson, Attorneys at Law; St. Louis, Missouri 63101

Thomas Butler v. Mary Davison & Sons Hauling

Summary: The driver and passenger of an automobile were injured after their vehicle violated a red light, and was struck

broadside by a dump truck operated by the Davidson & Sons driver.

Retained by Defense, deposition given

October 2002 Alan C. Mendelson, Attorney at Law; Chicago, Illinois 60602

Reyes v. Aspel

Summary: A tractor-trailer, operated by Daniel Aspel pulled away from a loading dock while Sirilo Reyes was working in or

around the trailer. Mr. Reyes fell from the trailer to the ground, resulting in seriously injuries.

Retained by Plaintiff

February 2002 Stone & Moore, Chartered; Chicago, Illinois 60602

Cynthia Woods v. C & K Trucking Co.

Summary: Cynthia Woods, a pedestrian, walked into the trailer of a passing tractor-trailer rig which was pulling a container

chassis, and was fatally injured.

Retained by Defense: deposition given

January 2002 John J. Dwyer, Jr., P.C.; Chicago, Illinois 60602

Decker v. Johnny Simpson & Roger's Cartage, Inc.

Summary: A tractor-trailer operated by J. Simpson was performing a U turn on a city street across four lanes of traffic, and

was impacted by a car operated by Eric Decker.

Retained by Plaintiff, deposition given

December 2001 Haldeman & Associates, Rockford, Illinois 61101

Estate of Dana Spuhler v. Gurjinder Braich, All Nations Logistics, & Hawk Transp.

Summary: A tractor-trailer operated on a highway by Gurjinder Braich was blocking a highway as Mr. Braich attempted to

back across the highway in order to turn around. His trailer was struck by Ms. Spuhler's van, and she died as a

consequence.

Retained by Plaintiff

November 2001 Hunt, Kaiser, Bush & Aranda, Ltd.; Bensenville, Illinois 60106

Jimenes v. Stec, et al.

Summary: A truck operated by Mark Stec pulled away from its parking spot, running over the head of Dionicio Jimines,

who had been asleep under the truck, fatally injuring him.

Retained by Plaintiff

November 2001 John J. Dwyer, Jr., P.C.; Chicago, Illinois 60602

O'Keffe v. Arrington, et al.

Summary: A tractor-trailer operated on an Interstate highway by Arthur Arrington swerved and rolled over into oncoming

traffic, resulting in additional crashes.

Retained by Plaintiff: deposition given, testified at trial

September 2001 Jordan Coyne & Savits, L.L.P.; Fairfax, Virginia 22030

Elizabeth Mathews, et al. V. Piney Branch Motors Inc. d/b/a Allied Transfer Sales, et al.

Summary: Jerry Collins, a driver for Piney Branch Motors, was operating a tractor-trailer "roll-off" unit when William

Matthews got in-between the tractor and roll-off container, and was fatally injured.

Retained by Defense

August 2001 Wuestling & James, L.C.; St. Louis, Missouri 63101

Baker, et al. V. Viterna, et al.

Summary: Harlan Viterna was operating a tractor-trailer, pulling out of a truck stop under foggy conditions, when his rig

was struck by vehicles coming from two different directions.

Retained by Defense, deposition given.

July 2001 Steven B. Muslin, Ltd.; Chicago, Illinois 60603

Donna Powell-Orff v. John Hardy, Monroe Transportation, et al.

Summary: Donna Powell-Orff, in her capacity as a forklift operator, was loading a trailer. While she was entering the trailer on her forklift, the driver of the truck pulled away from the dock, causing the forklift to fall out the back of the truck and

become lodged in-between the dock and the trailer.

May 2001 Jordan Coyne & Savits, L.L.P.; Fairfax, Virginia 22030

Arnatt v. Southeastern Freight Lines

Summary: A tractor-trailer operated on a highway by Matthew Bowen was forced off the road and into a ditch by an oversize crane traveling in the opposite direction. Mr. Bowen's trailer then left the ditch, going back onto the roadway, and was struck by a car operated by Mark Arnatt.

Retained by Defense

December 2000 Carr, Korein, Tillery, Kunin, Montroy, Cates, Katz & Glass, East St. Louis, Illinois 62201

Tristin Lewis, a Minor, v. David L. Goodwyn and Randy D. Huddleston

Summary: Tristin Lewis, a child, suffered crippling injuries while riding his bicycle along a narrow country road on the outskirts of the small town where he lived when a collision occurred between himself and a tractor trailer operated by Mr.

Huddleston.

Retained by Plaintiff, deposition given

November 2000 Straub, Seaman, & Allen; St. Joseph, Michigan 49085

Estate of Barney Reece v. Bobbie Reece, STV Transportation, and Public Warehousing Corporation. Summary: Barney Reece was fatally injured in a backing accident. Mr. Reece was in between a tractor-trailer being backed by his brother Bobbie, and the shipping/receiving dock, and was crushed.

Retained by Defense

September 2000 Lange, Simpson, Robinson & Somerville LLP; Birmingham, Alabama 35203

Inez Oliver v. Johnny Ray Rice and Oakley Trucking, et al

Summary: Inez Oliver's husband was fatally injured in an accident where Mr. Oliver was making a left hand turn from a two lane road into a driveway, and was struck by Mr. Rice's tractor-trailer as it attempted a passing maneuver around the

Retained by Plaintiff, deposition given

September 2000 Braud, Westensee & VanDerGinst; Wheaton, Illinois 60187

James Muse v. Polaris and Mid State Dist.

Summary: Mr. Muse, a highly-experienced tractor-trailer driver, was seriously injured while assisting in the unloading of

palletized ATV's at a Polaris distributorship.

Retained by Plaintiff

August 2000 Thompson Coburn LLP; St. Louis, Missouri 63101

Theresa M. Rush v. Celadon Trucking

Summary: Mrs. Rush's husband was fatally injured in an accident when he was struck by a tractor-trailer after entering a

four lane highway in front of said tractor-trailer.

Retained by Defense

July 2000 Lee Hagan, Attorney at Law; Fargo, North Dakota 58108

Benedict v. Pile Trucking

Summary: Mr. Benedict, a tractor-trailer operator, was lowering the dolly legs on his trailer in a truck stop when he was

struck and seriously injured by a driver operating a tractor-trailer for Pile Trucking.

Retained by Plaintiff

March 2000 Steven B. Muslin, Ltd; Chicago, Illinois 60603

Blakely v. USF Holland and Steven Haney

Summary: Ms. Blakely was a passneger in an automobile operated by her fiancée on a city expressway. Ms. Blakely suffered crippling and disfiguring injuries, and her fiance was killed when their vehicle was run over from the rear by a

tractor-trailer operated by Mr. Haney. Retained by Plaintiff: deposition given

November 1999 Hendren & Andrae LLC; Jefferson City, Missouri 65102

Jackson v. Johnson Grain and Jason Suttles

Summary: Ms. Jackson was seriously injured when the automobile she was driving in early morning darkness struck a

tractor-trailer backed into the roadway from a parking lot by Mr. Suttles.

February 1999 William O.P. Snead III, Attorney at Law; Fairfax, Virginia 22030

Lawray v. Frey Moss Structures, et al

Summary: Mr. Lawray was critically injured when the tractor-trailer he was operating for Federal Express struck another tractor-trailer, operated by a driver for Frey Moss Structures, which had attempted a U-turn on a four lane highway in front

of the Federal Express vehicle. Retained by Plaintiff: deposition given

October 1997 Harper & Rogers, Attorneys at Law; Valparaiso, Indiana 46385

Linda Crance v. Altered States Express

Summary: Ms. Crance, an employee of the truck stop where accident occurred, was walking through the parking lot when

she was run over by a tractor-trailer operated by a driver for Altered States Express.

Retained by Plaintiff

April 1997 Balkin & Doran Ltd.; Chicago, Illinois 60606

Carol Wilkus v. KLLM, Inc.

Summary: Ms. Wilkus, a security guard for a candy factory, was run over and critically injured by a tractor-trailer operated

by a driver for KLLM, Inc. during the performance of her duties.

Retained by Plaintiff: depos ition given, testified at trial

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