

1 the incident. You heard testimony about December 13th of
2 2000. Tell me what your physical condition was that day.

3 A. I was in extreme pain that day, and I had very
4 limited use of my body in many ways.

5 Q. Where were you experiencing pain?

6 A. In my neck, shoulders, left arm, hand, right leg,
7 and from the waist to my toes was 15 degrees colder than my
8 left. And it was a very bitterly cold day, and cold
9 weather makes me feel worse. So primarily in my neck and
10 shoulders.

11 That morning I had been to the Cleveland Clinic.
12 That's why they delayed the hearing until 12:30. And I had
13 trigger-point shots put in my neck and shoulders, twenty of
14 them --

15 Q. Can you --

16 A. -- at the Cleveland Clinic that morning for pain.

17 Q. Can you describe to the jury what trigger points
18 are based on your personal experience with trigger points.

19 A. When nothing else works, and I'm talking about
20 morphine and oxycontin, they will resort to -- and they
21 don't like to do it, but they will resort to taking needles
22 and putting shots right into the ganglia, into the nerve
23 clusters, and into the muscles. It's a mixture of
24 anesthetics and cortisone, and they will inject those. And
25 they put them right in my neck, and there was twenty of

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