

1 representative?

2 MR. STEPHENSON: I'm not gonna lie to you and
3 tell you he is -- Your Honor, but he's the guy I've got
4 here on behalf of BTL today; yes.

5 THE COURT: Well, he's the representative.
6 Isn't he allowed to stay?

7 MR. DRAMM: Understood, Your Honor.

RELAND DRAMM

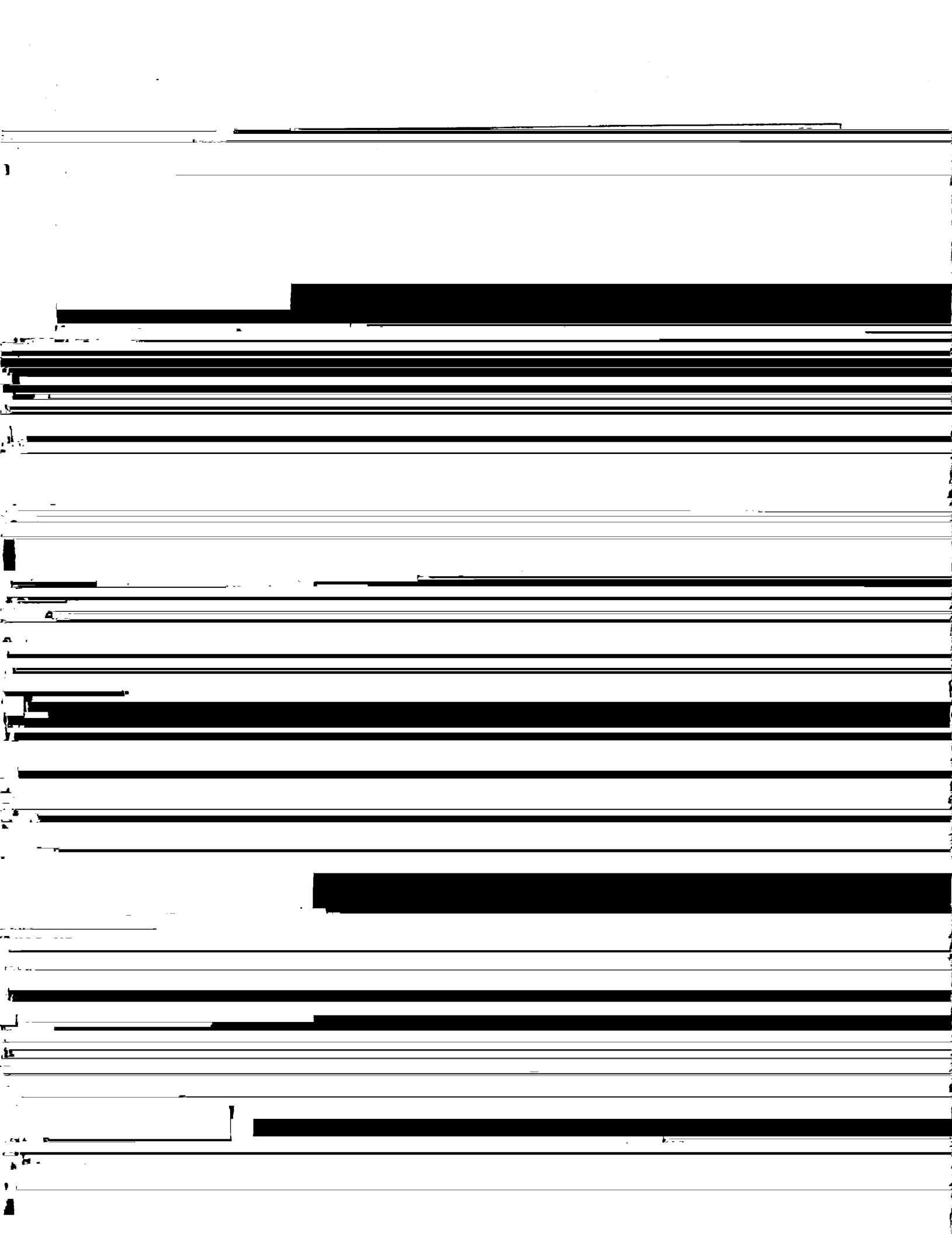
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[REDACTED]

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1 making sure everything from the front door to the
2 operating rooms to non -- clinical and non-clinical areas
3 are -- are cleaned and that we prevent any hospital given
4 infections from happening to patients.

5 Q: And how many folks do you supervise?

6 A: Approximately 50.

7 Q: And how do you do your job?

8 A: I do a lot of walking on my job. I -- I
9 have to be observant of all the surroundings around me.

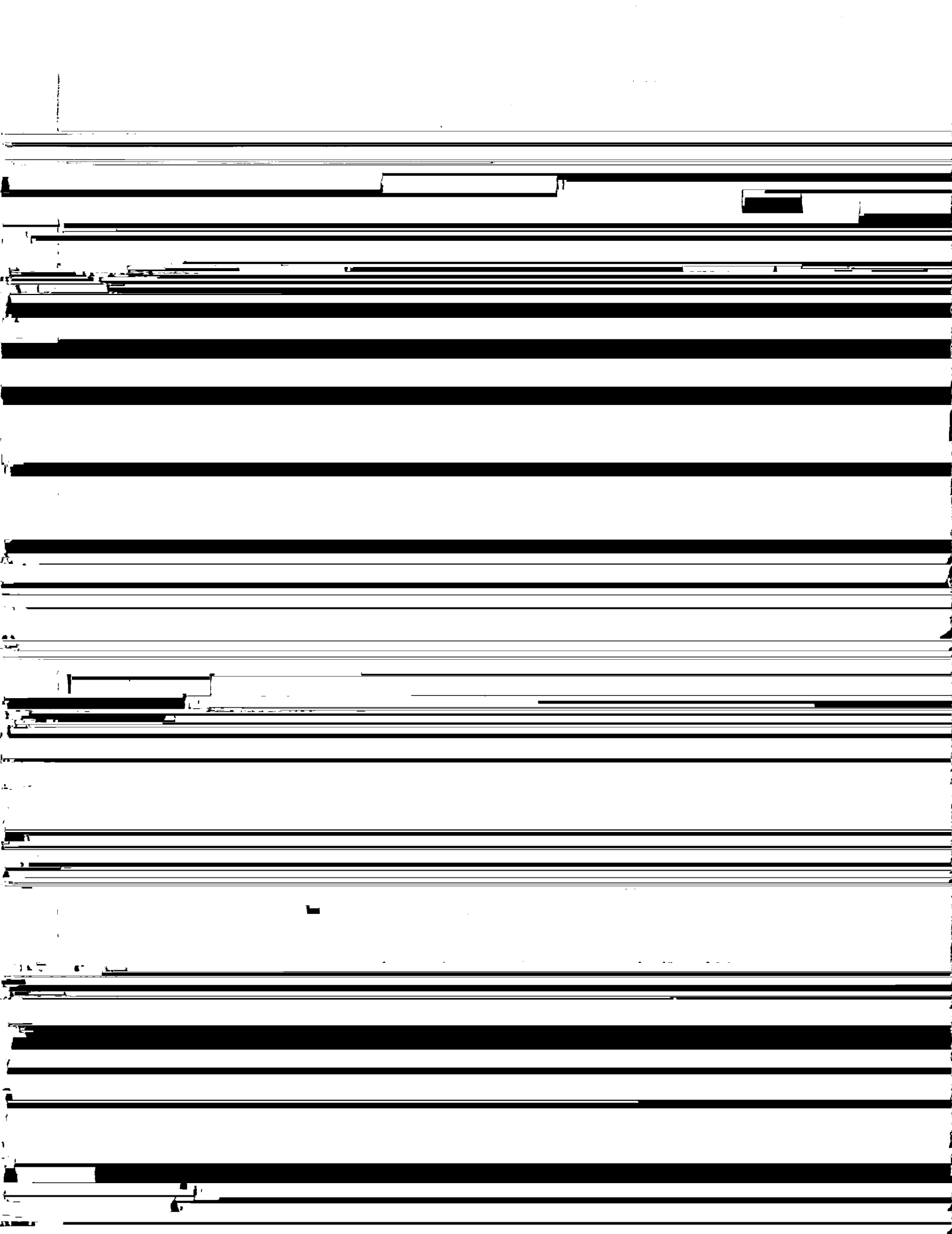
10 Q: Why?

11 A: It's very important to keep the hospital
12 clean.

13 Q: And so what sorts of things are you
14 typically looking for?

15 A: I look -- I'm looking in corners and edges
16 for dirt. I'm looking in the ceilings for dust on vents.

17 I try to make sure that bathrooms are clean. I make sure that



1 (Counsel approaches the bench.)

2 How is this relevant?

3 MR. BRATT: Well, Your Honor, this is relevant
4 as to his background and credibility as --.

5 THE COURT: Well, you -- you -- he --.

1 where was your job station?

2 A: Andrews Air Force Base.

3 Q: Okay.

4 And when did you join the Navy Reserves?

5 A: I joined the Navy Reserve.

6 MR. STEPHENSON: Objection, Your Honor.

7 THE COURT: Sustained.

8 A: I joined the Navy Reserves in 19 --.

9 THE COURT: Whoa. Whoa.

10 Next question.

11 Sustain the objection.

12 Q: When did you begin -- when were you first
13 stationed at Andrews?

14 A: Right after the 911 incident with the --
15 the bombing of the -- the blowing up of the -- World
16 Trade Center and the -- Pentagon.

17 Q: Okay.

18 Now, did you -- had you ever had occasion to
19 travel from your home to Andrews Air Force Base and back
20 before March 13th?

21

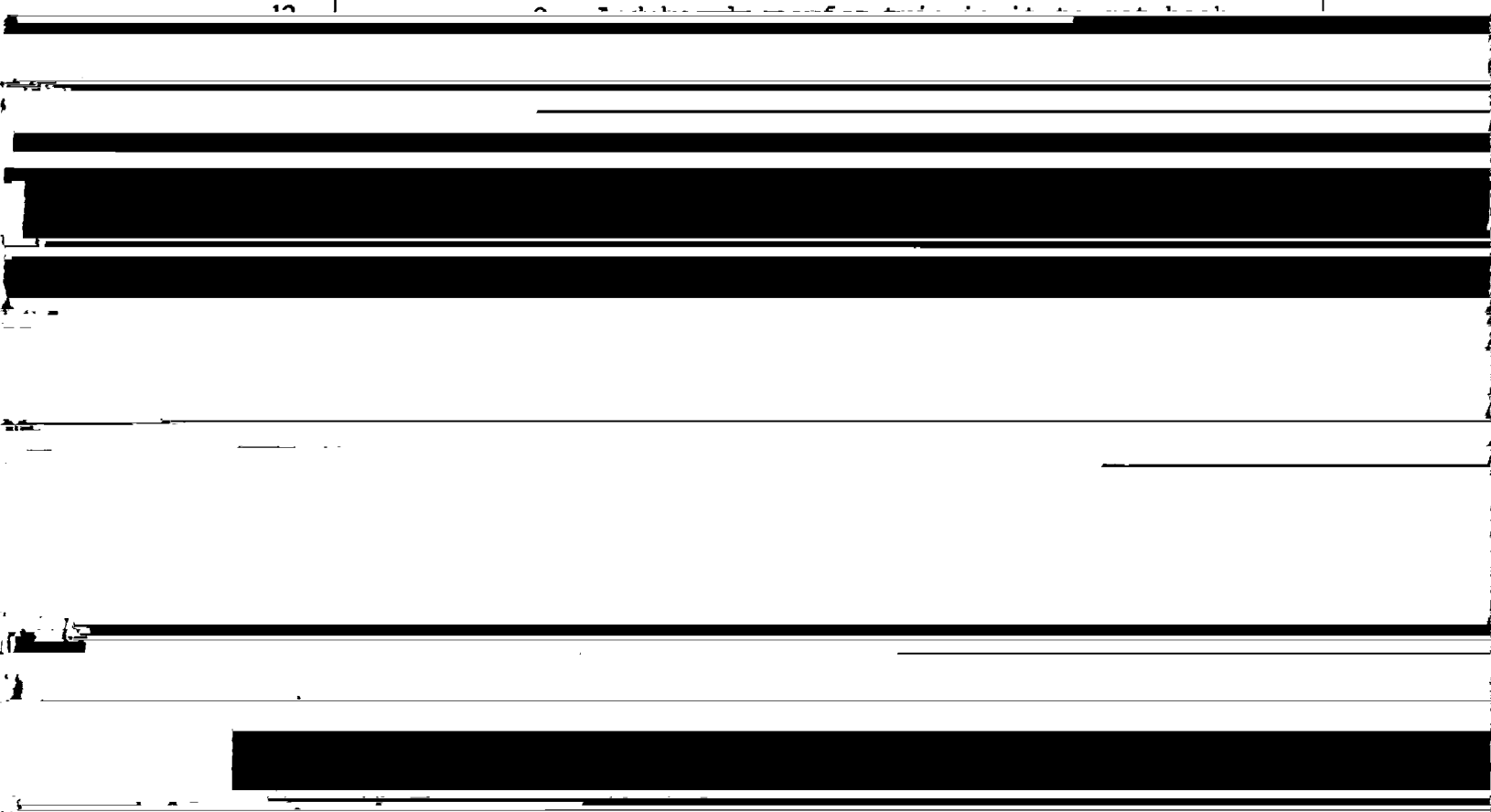
1 A: I was just leaving Andrews Air Force Base.
2 I came out the back out which is the Virginia Gate. It
3 comes out onto -- Alexander Ferry Road. I made a right

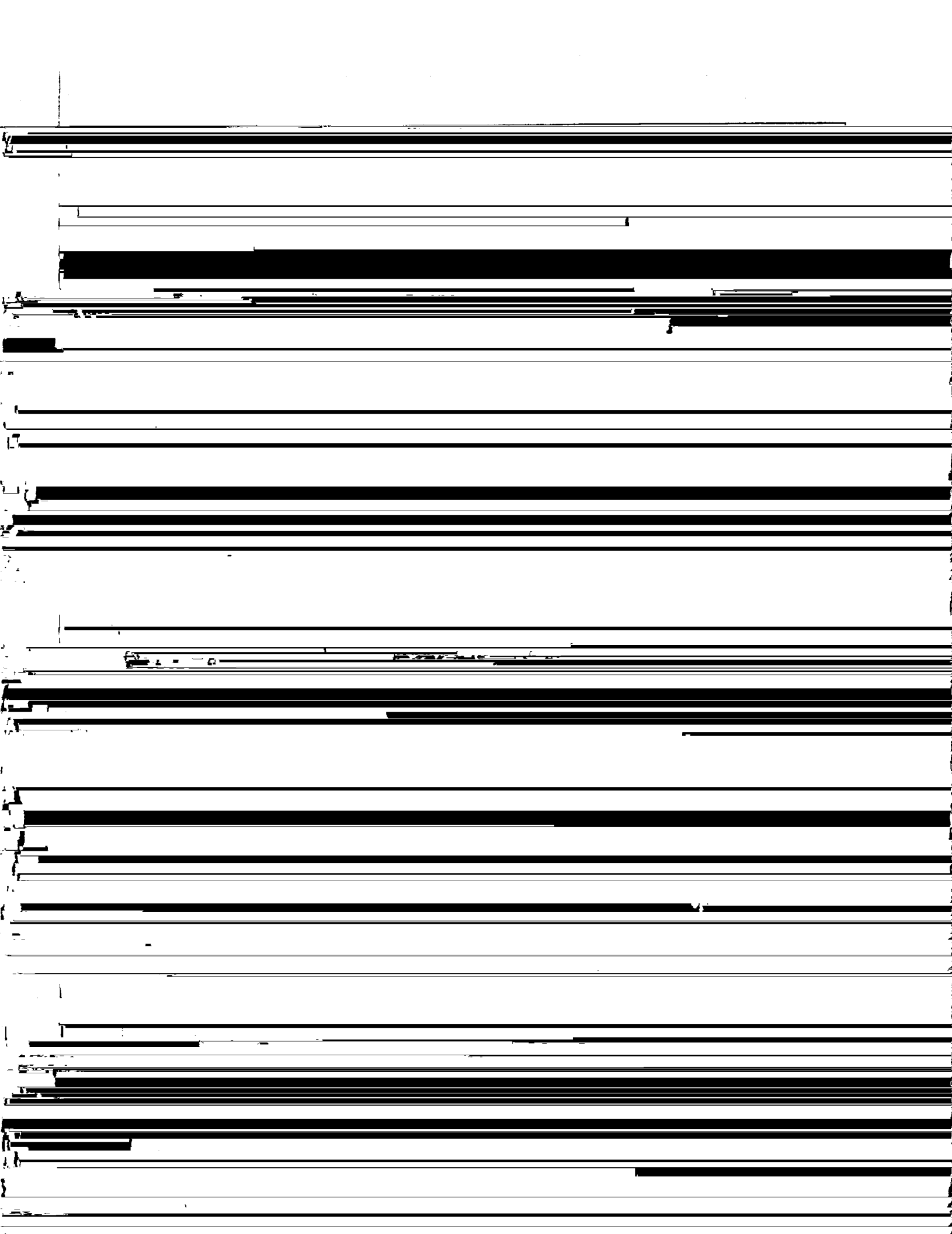
1 block away from the intersection of Leonardtown Road --
2 Leonardtown and Mattawoman Beantown and I went down to
3 Andrews Air Force Base, took my bicycle out the back of
4 my car -- out of the trunk of my car. And -- I rode it
5 around the base, the perimeter of the base. And once I
6 finished I put the bicycle back in the car and left the
7 base. It usually takes me about a hour to make that
8 ride.

9 Q: And about what time did you leave the base
10 that day?

11 A: About 11:30.

12





1 two of the left, of the left turn.

2 Q: May I approach the witness. Your Honor?

1 A: That is correct.

2 Q: Can you show me where you were when you
3 first observed that -- tractor trailer?

4 A: I was back here somewhere.

5 Well, when I first observed it way down -- way
6 down on Route 5.

7 Q: So you had seen him for the first time
8 sometime before you arrived at the area that's shown on
9 the exhibit?

10 A: That is correct.

11 Q: Using the exhibit can you show the ladies
12 and gentlemen of the jury how the accident happened.

13 A: Well, as I say -- stated -- I was coming
14 down Maryland Route 5, Mattawoman Beantown Road. At
15 about this point right here I know the road -- the lane
16 turn -- merges for you to get over. I always get over
17 right here.

18 At about right up in this area the Baltimore
19 Trank -- Tank Line came over. I was already over in the
20 lane somewhere around here where the second -- well, this
21 turn lane here starts

1 Just as soon as I got in this lane I was rear-
2 ended. The accident happened somewhere around here
3 because the State Trooper came along and when he took my
4 -- my bumper off my car he put it over here on the hill.

1

THE COURT: Okay.



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Q: And so we're clear, this frame, Exhibit 2,

is that correct?

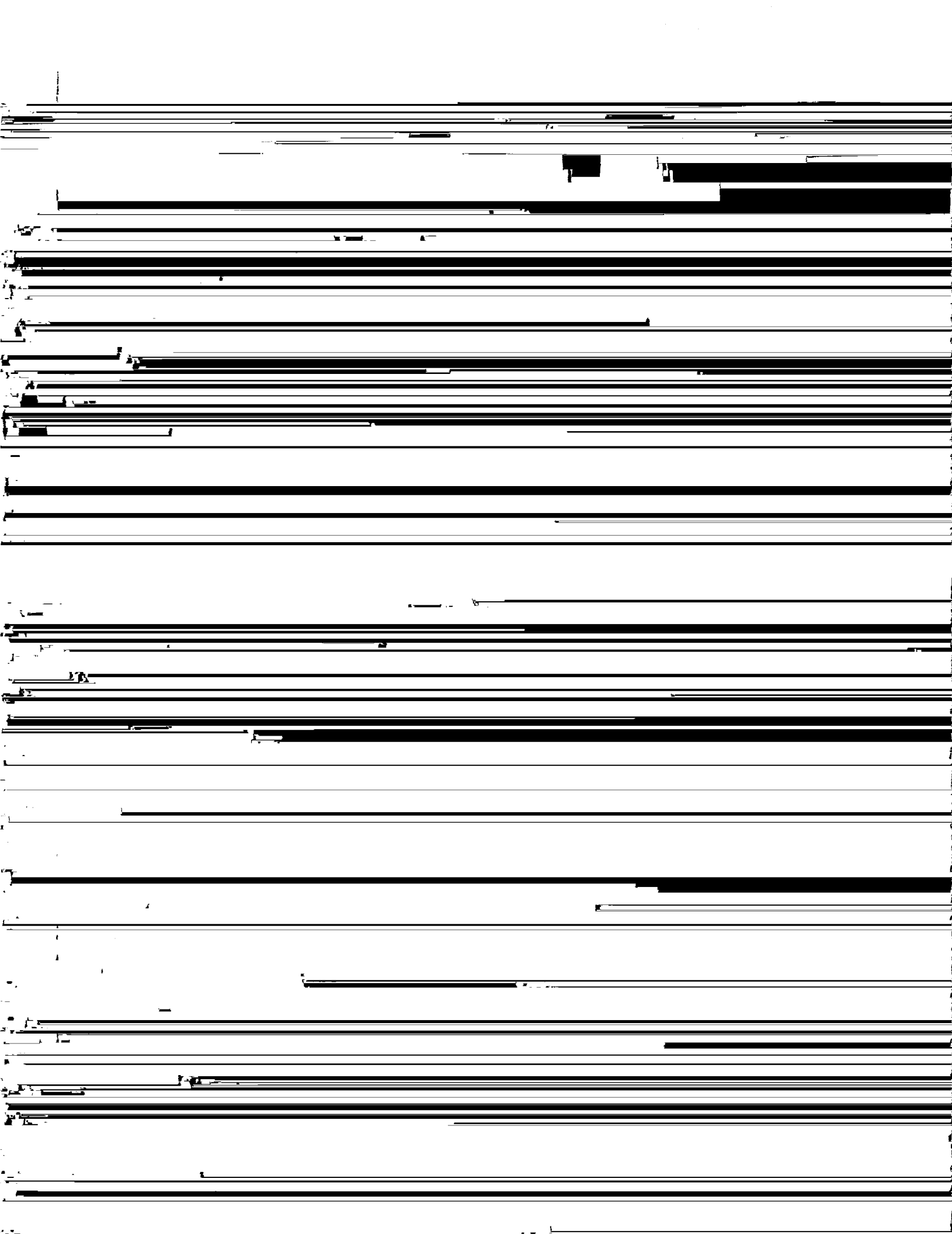
[REDACTED]

[REDACTED]

THE COURT: Overrule.

1

Continued



1 accident. Now he's trying to suggest that my client was
2 speeding prior to the accident so as to prejudice the
3 jury.

THE COURT: What's the response gonna be?

1.

A: Yes I did.

1 A: Correct.

2 Q: Okay.

3 And when you say you were in the -- the right
4 lane are you talking about the right sided left turn
5 lane?

6 A: The right sided left turn lane.

7 Q: What happened next?

8 A: I start traveling a few yards and then

1

lights?

1 A: After it hit me.

2 Q: And what kind of vehicle was it?

3 A: It was a green Dodge Caravan.

4 Q: Did you have an opportunity to look to your
5 left before changing lanes?

6 A: I'm sorry, I didn't hear you.

7 Q: Did you have a chance to look to your left
8 before you changed lanes?

9 A: No.

10 Q: About how long did that lane change take?

11 A: Seconds.

12 Q: And what was the position of your vehicle
13 in the far left lane after you switched over?

14 A: After I switched over I was in -- in the
15 immediate lane.

16 Q: And how was your car oriented within that
17 lane?

18 A: It was straight.

19 Q: And the vehicle, the Dodge that hit you,
20 what part of that vehicle hit what part of your vehicle?

21 A: My left rear corner was hit. And if I'm
22 not mistaken, the -- center of the Dodge had hit me.

23 Q: What happened after that -- strike that.

24 Was there any collision between your car and
25 the tractor trailer?

1 A: None.

2 Q: And do you know why not?

3 A: I had got -- I have got out of that lane
4 before it could occur.

5 Q: Now, what happened after the Dodge struck
6 the rear of your vehicle?

7 A: I suddenly stopped.

8 Q: And what happened next?

9 A: I just cleared my head for a second and I
10 immediately called my brother.

11 Q: Why?

12 A: Because I knew that he would give me some
13 information on what -- since the Baltimore Tank Line
14 truck didn't stop. I couldn't see the number or anything

1 was the only driver in the vicinity of the accident and
2 the accident location when it occurred.

3 They're now trying to imply or inject some sort
4 of cover up or we didn't provide information that was
5 necessary. None of this is relevant to how the accident
6 happened, Your Honor.

7 MR. DRATT: All I asked him was if his brother

1 Q: And Mr. Ervin, after you talked to your
2 brother did you talk to anybody else?

3 A: Well, I called the Baltimore Tank Line.

4 Q: No, the -- let me strike that.

5 Did you speak with Ms. Young?

6 A: Yes, we did.

7 Q: What, if anything, did you say to Ms.

8 Young?

9 A: I think the first thing that I asked her
10 was did you see that truck run me out of my lane.

1 A: Well, I told him how I -- how the accident
2 happened.

3 Q: What did you say to him?

4 A: I told him how I was traveling in the
5 direction that I was and how the tractor trailer had run
6 me out of my lane. And -- and that was it.

7 Q: Okay.

8 And just -- so we're clear for the record the -
9 - what I had shown you is -- what was I -- identified as
10 Plaintiff's Exhibit Number 2, the diagram you had
11 prepared. Does that fairly and accurately to the best of
12 your recollection represent the area of the collision and
13 what happened?

14 A: Yes.

15 Q: Your Honor, I'd ask that what's been I.D.'d
16 as Plaintiff's 1 and 2 be admitted into evidence.