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Case : Lichtman v. Blanchard Equipment  
Testimony Date : April 06, 2011  
Expert Witness : smith reed  
Expert Type : Engineering Forensic Disciplines  
Court : State: Georgia County: bulloch  
Pages : 120

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IN THE STATE COURT OF BULLOCH COUNTY STATE OF GEORGIA	I N D E X
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MICHAEL LICHTMAN and ) CIVIL ACTION NO.:	EXAMINATION
STEPHANIE LICHTMAN, ) 2B10CV397	
PLAINTIFFS, )	By Mr. Dekle 6
-vs- )	By Ms. Franklin 178
BLANCHARD EQUIPMENT CO., ) DEPOSITION OF:	By Mr. Dekle 192
INC. and DAVID B. BROWN, ) E. SMITH REED, JR.	Signature by Deponent 196
DEFENDANTS. )	Certificate of Reporter 197
_____ )	(Reporter's Disclosure Statement attached to back of transcript.)
Deposition of E. SMITH REED, Jr. taken by counsel for the Defendants pursuant to notice and by agreement of counsel, reported by Suzette R. Weis, CO-CSR, RPR, at Brennan and Wasden, 411. E. Liberty Street, Savannah, Georgia, on April 6, 2011, commencing at 9:35 a.m.	*****
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TRANSCRIPT PREPARED BY:	
MCKEE COURT REPORTING, INC.	
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Also Present: David Brown and Larry Saunders	14 June 29, 2010, Letter 192

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1 MR. DEKLE: Would you please swear the  
 2 witness.  
 3 E. SMITH REED, JR.,  
 4 was sworn to tell the truth, the whole truth, and nothing  
 5 but the truth and testified as follows:  
 6 MR. DEKLE: This will be the deposition of  
 7 Mr. E. Smith Reed. It's taken in the case of  
 8 Michael and Stephanie Lichtman, Blanchard  
 9 Equipment Company and David Brown. Parties to  
 10 this case represented by counsel. Counsel of  
 11 record are present. I propose we reserve all  
 12 objections save as to the form of the question  
 13 or responsiveness of the answer until the time  
 14 of trial or first use of deposition testimony.  
 15 MR. MANTON: That's fine.  
 16 MR. DEKLE: Deposition is taken pursuant  
 17 to notice, agreement of counsel for  
 18 cross-examination and all purposes allowed  
 19 under the Georgia Civil Practice Act.  
 20 Mr. Reed, you have the right to read and sign  
 21 your deposition. Would you like to exercise  
 22 that right or waive that right?  
 23 THE DEPONENT: I will exercise it, thank  
 24 you.  
 25 MR. DEKLE: And we'll stipulate that you

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1 can do that in the presence of any notary  
 2 public.  
 3 THE DEPONENT: That's fine.  
 4 EXAMINATION  
 5 BY MR. DEKLE:  
 6 Q Would you please state your full name for  
 7 the record.  
 8 A My name is E. Smith Reed.  
 9 Q And what is your address?  
 10 A 5 Dayton Drive, Hanover, New Hampshire  
 11 03755.  
 12 Q And who lives with you at that address?  
 13 A My wife.  
 14 Q And what is her name?  
 15 A Virginia.  
 16 Q Is she employed outside the home?  
 17 A Yes.  
 18 Q What does she do?  
 19 A She teaches and does research, teaches at  
 20 the medical school and does research at Dartmouth  
 21 College.  
 22 Q What does she teach?  
 23 A Fourth year course called Health Society  
 24 and the Physician.  
 25 Q And what is her background? What are her

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1 degrees?  
 2 A BS in nursing, masters degree in nurse  
 3 midwifery, Ph.D. in psychology, and medical  
 4 education.  
 5 Q Has she assisted you in your --  
 6 formulating your opinions in this case?  
 7 A No.  
 8 Q Have you done everything that you need to  
 9 do in order to form full and final opinions in this  
 10 case, to give your opinions here today and in the  
 11 courtroom?  
 12 A I have to say no. This case, as you can  
 13 understand or as we get into the discussions here,  
 14 hasn't been -- has not become completely apparent to  
 15 me until extremely recently, just in the last two or  
 16 three days when the tractor at question has been  
 17 operable.  
 18 This conclusions -- the conclusions that I  
 19 have drawn are based on some research, some  
 20 preliminary calculations. But I have not ruled out  
 21 all other aspects of what could -- possibly could  
 22 have happened as we will get into discussions and  
 23 there may be further work.  
 24 If that answers your question.  
 25 Q All right, sir. When were you first

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1 contacted about this case?  
 2 A Roughly last summer, June perhaps, in  
 3 2010.  
 4 Q And do we have documentation of that  
 5 contact date?  
 6 A Yes.  
 7 Q And would we find that in the materials  
 8 you brought with you today?  
 9 A You would.  
 10 Q And if you would, just give us the -- your  
 11 best information concerning when you were first  
 12 contacted?  
 13 A I was contacted on June 29th of 2010  
 14 through a telephone call from an attorney, Mr. Paul  
 15 Painter.  
 16 Q And what were you asked to do by  
 17 Mr. Painter?  
 18 A Well, at that time I was not asked to do  
 19 anything other than send him information about  
 20 myself, my background. And further conversations  
 21 beyond that date took place.  
 22 Q All right, sir. And you've handed me a  
 23 piece of paper out of your file dated 6-29-10, is  
 24 this in your handwriting?  
 25 A Yes, it is.