

1 that storm?

2 A Yes.

3 Q What equipment was used?

4 A Plow and wings.

5 Q Could you describe in the area in question
6 how you went about plowing 36 inches of snow on or
7 about February 14, 2007? How many times did you go
8 back and forth across it, and how did you do it, et
9 cetera?

10 A I'm really not sure how many times I went
11 back and forth, but it was a lot. We put the center
12 of the front plow on the center of the road and plowed
13 that way.

14 Q When you got down to the lowest point on
15 Cross Road in the area in question did you have any
16 difficulty plowing through that area?

17 A The wing hit stones on the road.

18 Q Stones on --

19 A From the farm road.

20 Q On the farm road?

21 A Yes.

22 Q When it hit stones what did you do?

23 A Pulled out a little bit to the other lane.

24 Q In other words, you moved the plow and its
25 wing over to the left?

1 A Yes.

2 Q Beyond the center?

3 A Yes.

4 Q As a result, how close to Cross Road was the
5 embankment of that?

6 A I don't recall.

7 Q Was it quite close? Was it --

8 A It was closer than usual.

9 Q Closer than usual.

10 Q Do you know how high in the lowest point of
11 the area in question how high in relationship to Cross
12 Road the farm roads are?

13 A About six feet.

14 Q During that storm of February 14, 2007, was
15 a grater used?

16 A No.

17 Q Was the front end loader used?

18 A Not in that section of the road, no.

19 Q Do your other duties entail things like
20 cleaning ditches, et cetera?

21 A Yes.

22 Q Do you clean the ditches along Cross Road?

23 A Yes.

24 Q How often do you clean the ditches?

25 A Every year.