

Written Testimony of Geoff Campbell (Deposition) (Exhibit Allegra-6)

We offer written testimony of Mr. Campbell in the form of deposition testimony. Geoff Campbell, a landscape contractor hired by Wood to mitigate the water inundation with a sump-pump and interceptor drainage system, observed that the entire back one third of Wood's property was muddy and boggy—an area well outside the claimed easement. Later in the deposition, Campbell upped his estimate of the boggy area to two thirds of Wood's back yard. Campbell Depo., pp. 15:21—16:5; pp. 21:17—22:4. OPE, ¶4J and Tab J.

Campbell's feet sank "half an inch to an inch" when he walked on Wood's grass area. *Id.* at p. 59:2-11.

When Campbell dug into the ground, "moving water" started filling up the trench so fast that his crew had to set up a temporary sump pump to remove the water so that excavation could be completed. *Id.* at 61:2-25.

During the digging, Campbell discovered a 55-gallon drum buried in Wood's back yard. No one knew the drum was there, and it was an obviously jerry-rigged attempt to collect the underground water. *Id.* at 65:19—67:12.

The sump pump installed by Campbell ran so often that it burned out from overuse approximately 12 months after it was installed. *Id.* at 69:20-25.

The water inundation of which Plaintiffs' complain is subsurface water, seeping or leaking through the earthen dam under the ground's surface, and "onto, under and across" plaintiffs' properties. Campbell Depo., p. 61:2-25, (Exhibit "Allegra-6") ["moving water" filled up trench faster than he could dig]

1 IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA
 2 IN AND FOR THE COUNTY OF PLACER
 3 TONY and DONNA WOOD and TED and
 4 CHERI ALLEGRA,
 5 Plaintiffs,
 6 vs. Case No. SCV 16896
 7 HIDDEN LAKES ESTATES HOMEOWNERS
 8 ASSOCIATION, et. al.,
 9 Defendants.
 10 _____/
 11 DONNA WOOD and CHERI ALLEGRA,
 12 Plaintiffs,
 13 vs. Case No. SCV 14042
 14 HIDDEN LAKES ESTATES HOMEOWNERS
 15 ASSOCIATION, et. al.,
 16 Defendants.
 17 _____/
 18
 19 Deposition of
 20 GEOFF CAMPBELL
 21 Thursday, July 7, 2005, 1:30 p.m.
 22
 23 Reported by:
 24 TOBIE STERLING
 25 CSR No. 4019

1 APPEARANCES:
 2
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 7
 8 For the Defendants: KENNETH A. JONES, ESQ.
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 12
 13 For the Defendant HOA: CHRIS EGAN, ESQ.
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 18 ---oOo---
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1 IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA
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 6 vs. Case No. SCV 16896
 7 HIDDEN LAKES ESTATES HOMEOWNERS Case No. SCV 14042
 8 ASSOCIATION, et. al.,
 9 Defendants.
 10 _____/
 11 ---oOo---
 12
 13 BE IT REMEMBERED that on Thursday, the 7th day of
 14 July 2005, commencing at the hour of 1:30 p.m., at the
 15 offices of Sterling & Associates, 101 Orange Street,
 16 Suite A, Auburn, California, before me, Tobie Sterling, a
 17 Certified Shorthand Reporter in and for the State of
 18 California, personally appeared
 19 GEOFF CAMPBELL
 20 called as a witness by the Defendants, pursuant to the Code
 21 of Civil Procedure of the State of California, and who,
 22 being by the Certified Shorthand Reporter first duly and
 23 regularly sworn to tell the truth, was thereupon examined
 24 and testified as hereinafter set forth.
 25 ---oOo---

*** Notes ***

1 term PMK, which stands for person most knowledgeable.
 2 Today's deposition notice requested the attendance of the
 3 person most knowledgeable at C & R Landscape regarding any
 4 work done at 7884 Jon Way, Granite Bay, or 8316 East Hidden
 5 Lake Drive, Granite Bay. Are you the person most
 6 knowledgeable about those two subjects?
 7 A. Jon Way, yes.
 8 Q. Have you done any work at all at 8316 East Hidden
 9 Lake Drive, Granite Bay?
 10 A. No, I have not.
 11 Q. Okay. So only at Jon Way?
 12 A. That's correct.
 13 Q. Do you think you've been designated correctly as
 14 the PMK?
 15 A. Probably, yeah. I mean I, I was at the initial
 16 -- at the initial meeting between myself and Mr. Wood and
 17 oversaw most of if not all of the work.
 18 Q. Okay. We'll come back to that in a minute.
 19 A. Okay.
 20 Q. For the record, Mr. Campbell, in your deposition
 21 notice, it asked that you produce all documents in your
 22 control concerning the work at 7884 Jon Way. And you told
 23 me earlier that you had miss -- not seen that part of the
 24 deposition notice?
 25 A. That's correct.

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1 Q. Okay. So we've asked that those documents be
 2 faxed here, and they, they should come later?
 3 A. That's correct.
 4 Q. And we'll address them at that time.
 5 A. Okay.
 6 Q. You spoke about work that you did do at 7884 Jon
 7 Way. Mr. Campbell, can you tell me the first time -- I'm
 8 -- I can assume, then, that you have met Mr. Tony Woods?
 9 A. Yes, that's correct.
 10 Q. Okay. Would you tell me the first time you met
 11 Mr. Woods?
 12 A. I would say it was a -- it was early in 2003, in
 13 the year 2003.
 14 Q. Okay. Did --
 15 A. January, February, somewhere in there.
 16 Q. Did Mr. Wood contact you?
 17 A. Yes, he did.
 18 Q. And could you explain how that contact went?
 19 A. Typically, a call is made to the office. The
 20 secretary sets up an appointment. I go out and I visit
 21 with the owner or owner's rep and am advised of what work
 22 would like to be done. And that, that's what happened in
 23 this case. Then I -- we discussed possible remedies or
 24 acts to resolve the problem that Mr. Wood was having.
 25 Q. Okay. Do you remember your first initial meeting

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*** Notes ***

1 with Mr. Wood?
 2 A. Vaguely.
 3 Q. What do you remember about your first meeting
 4 with Mr. Wood?
 5 A. I, I remember that he had, that he had a
 6 renovated house in an older subdivision, and that, and that
 7 his back yard basically was adjoining with a community
 8 lake. And that it was -- it was his interpretation that,
 9 that, that his lot being lower than the water level than
 10 the lake was, was absorbing water from that lake in some
 11 way, shape or form. And that he did have a very muddy,
 12 boggy situation. Even though it was -- he said that it was
 13 year-round, that the problem was an ongoing problem, not
 14 just because it was wintertime.
 15 Q. Did you investigate the situation on that first
 16 visit?
 17 MR. PETERSON: Objection, vague and ambiguous.
 18 Q. BY MR. JONES: Did you view the back yard on the
 19 first visit?
 20 A. Yes, I did.
 21 Q. Could you tell me what you saw?
 22 A. The back yard was, was fully landscaped; and in
 23 the back, back one-third of the yard I would say closest to
 24 the, to the lake from the property line towards his house,
 25 there was probably the lowest part of the yard, which might

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1 be 30 to 40 feet, was, was obviously boggy. Its soil was
 2 -- its soil and turf, what turf had survived the, the
 3 condition that it was in, was -- I don't know how else to
 4 describe it besides boggy. It was -- when I stepped, water
 5 came up, so it, so it pumped to some extent.
 6 Q. Okay. And, again, can you -- I know you said it
 7 would be in the spring. Can you pinpoint the month that
 8 you visited?
 9 A. If when the fax gets here, I believe it will show
 10 that the proposal was generated in March, so that would
 11 mean that, you know, the appointment could have been as
 12 much as two weeks before that.
 13 Q. This would be March 2000 --
 14 A. Three.
 15 Q. -- 3. You mentioned that the, the lowest part of
 16 the yard, 30 to 40 feet was boggy. Could you explain to me
 17 30 to 40 feet from where?
 18 A. From the back property line into his yard.
 19 Q. Okay.
 20 A. Can I draw a picture?
 21 Q. Actually, let's do this. Can I enter this as
 22 Exhibit 2?
 23 (Exhibit 2 was marked.)
 24 Q. I'd like to represent to you that this is the map
 25 that has been prepared of the back yard, if we could use

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*** Notes ***

1 sorry. You've given me what I would call the length of a
 2 boggy area between the picket fence and the house. How
 3 wide was that area? In other words, looking at this
 4 picture from one side to the other side of the berm.
 5 A. Well, I'm going to draw some arrows here.
 6 Q. Okay.
 7 A. Land falls this way, natural grade or whatever.
 8 To some extent -- I don't know if it falls that way right
 9 here at the bottom, but all the -- it generally kind of
 10 goes that way a little bit. At least at -- he may, may be
 11 correct that they're not showing a setback here because the
 12 scale does not look correct to me. I would guess, I would
 13 guess from, from what would be the southeast property line
 14 going, going north, west or whatever, I would guess
 15 approximately 40 feet.
 16 Q. Okay. So --
 17 MR. PETERSON: Clarifying question. Was this
 18 40-foot-wide span of boggy turf and soil condition
 19 something less than the span of the yard? In other words,
 20 did the, did the boggy condition run from --
 21 THE WITNESS: Yes, that's correct.
 22 MR. PETERSON: -- one side -- was the, was the
 23 boggy condition, did it, did it span what you visually
 24 discerned were the lot lines of Mr. Wood's property?
 25 THE WITNESS: I don't, I don't believe so. I

1 think the question is a correct question. It's -- that's
 2 why I gave kind of the contour lines, just -- or the arrows
 3 because there is some type of fall from this property line
 4 this way, so there -- so the boggy was like two thirds.
 5 Q. BY MR. JONES: Okay. Mr. Campbell, maybe as we
 6 go, there are some other pictures that we can introduce.
 7 We can come back and talk about it.
 8 A. Sure.
 9 MR. PETERSON: Can I clarify one other thing?
 10 You have estimated, and I think all of us appreciate that
 11 these are estimates, based on visual information that you
 12 got two years or more ago.
 13 THE WITNESS: Right.
 14 MR. PETERSON: You indicated that the, the, the
 15 boggy condition was 30 to 40 feet from the back fence and
 16 30 to 40 feet wide; am I getting this right?
 17 THE WITNESS: That's correct.
 18 MR. PETERSON: Okay. So it was, essentially in
 19 your visual perception was a, a -- roughly a square area of
 20 boggy?
 21 THE WITNESS: Yeah, I think so.
 22 MR. PETERSON: Okay.
 23 THE WITNESS: Yeah, because the --
 24 MR. JONES: Okay.
 25 THE WITNESS: -- lot is definitely triangular

*** Notes ***

1 shape.
 2 MR. PETERSON: Okay.
 3 MR. JONES: Okay.
 4 THE WITNESS: So as you come away, it would
 5 create a square.
 6 Q. BY MR. JONES: Let's jump back on track here,
 7 then.
 8 When you went out there this first time, was
 9 there a swimming pool?
 10 A. Yes, there was.
 11 Q. Okay. And so this bog -- did you notice
 12 boggy between the swimming pool and the house?
 13 A. No.
 14 Q. The -- and do you recollect how close the
 15 boggy came to the swimming pool?
 16 A. Within 10 feet, probably, or, or closer.
 17 There's, there's the, there's the pool and then there's --
 18 there was at the, at that point a small waterfall, and then
 19 a small four-foot-wide walkway, three-foot-wide walkway,
 20 and so it, it came right up to that walkway pretty much.
 21 Q. Okay. After your first meeting -- let's go back
 22 to the question I had started a little while ago.
 23 After your first meeting, did you plan a second
 24 meeting with Mr. Woods?
 25 A. There may -- a lot of times I meet with clients a

1 few days prior to the start of the job to make sure that we
 2 have a grasp of what's going to be done as far as what is
 3 proposed and make sure that there is no miscommunications
 4 or that everything is clear as far as the scope of work
 5 before it's even started.
 6 Q. Okay. Did, did you create a proposal, then, for
 7 Mr. Wood to do this work?
 8 A. On the second time or the first time?
 9 Q. The first time.
 10 A. At the first meeting, yes, a proposal was
 11 generated.
 12 Q. Was this proposal written?
 13 A. Yeah. Computer generated, yes.
 14 Q. And is this a document that's being faxed here?
 15 A. Yes, that's correct.
 16 Q. Okay. Do you recollect what this document says,
 17 or would we be better off to wait for it to show?
 18 A. We'd be better off to wait for it to show up.
 19 MR. JONES: Okay. Can we take a break for a
 20 second?
 21 (Off the record.)
 22 MR. JONES: Okay. Let's go back on the record.
 23 Q. Okay. Mr. Campbell, we're back on the record.
 24 You just handed me a stack of documents that have been
 25 faxed from your office.

*** Notes ***

1 A. I don't believe so.
 2 Q. When you actually dug up the ground to install
 3 the French drain, did you see standing water under the
 4 ground?
 5 A. Not standing water but moving water. Water -- as
 6 soon as we started digging, water started filling the
 7 trench.
 8 Q. Okay.
 9 A. At, at two or three inches in depth, it started
 10 bleeding in water.
 11 Q. Okay. Do you remember what direction the water
 12 was bleeding? Was it toward, toward the property?
 13 A. It was towards the property and then -- and --
 14 MR. PETERSON: Excuse me. Towards the house you
 15 mean?
 16 THE WITNESS: Yes, towards the house.
 17 Q. BY MR. EGAN: Can you estimate how fast the water
 18 filled?
 19 A. Fast enough that we had to set up a temporary
 20 sump and pump the water out because we could not dig in it.
 21 Q. Where did you install the temporary sump?
 22 A. I believe at the sump location. We went ahead
 23 and dug the sump location and let the water drain into that
 24 and be pumped out of that point so the trench could
 25 continually be dug.

1 Q. Okay. Okay. After you had, you had finished
 2 installing the sump pump --
 3 A. Um-hmm.
 4 Q. -- you returned to the property approximately a
 5 year ago; is that what you told us earlier?
 6 A. Yes.
 7 Q. And that was to perform maintenance on the sump
 8 pump?
 9 A. Correct.
 10 Q. Okay. Did you walk through the same boggy area
 11 at that time?
 12 A. The same area, yes; boggy, no.
 13 Q. Okay. Can you describe the area at this present
 14 time after -- when you were performing the maintenance?
 15 Was it less boggy --
 16 A. Yes.
 17 Q. -- than before?
 18 A. Less boggy. The new turf was in, in good health,
 19 not in decline. Certainly not -- I mean certainly not in
 20 the decline it was the initial time when I was there.
 21 Q. Were there any dead plants in that area, if you
 22 can recall?
 23 A. I don't recall. I don't think there's any plant
 24 material in that area.
 25 Q. Okay. Were your feet sinking into the ground in

*** Notes ***

1 that area?
 2 A. No.
 3 Q. Did you see any, any water rising when you
 4 stepped in that area?
 5 A. No.
 6 Q. Did you notice any wet or soggy conditions in any
 7 other area of the property at that time?
 8 A. On any other part of the property?
 9 Q. Back yard.
 10 A. In the, in the back, in the back yard, no. In --
 11 I don't, I don't think so, with maybe -- I know at one -- I
 12 know at one point there was -- the sump is not against the
 13 fence line. It's five or six feet into the yard from it on
 14 the side yard, the side property line, and, and in that
 15 area, yes, there was, there was still some moisture. I
 16 wouldn't have called -- I don't think I'd call it a bog,
 17 but it was, but it was -- the ground was saturated.
 18 MR. PETERSON: I'm sorry. Where was that?
 19 THE WITNESS: In, in this corner, basically. If,
 20 if we're looking at Exhibit 5 and the sump pump is just off
 21 to the right, then the fence would be another six feet over
 22 to the right, the sideline fence and in that area.
 23 MR. PETERSON: Okay. So was that area inside or
 24 outside the drainage system serviced by the --
 25 THE WITNESS: Outside.

1 MR. PETERSON: -- sump?
 2 THE WITNESS: Outside.
 3 MR. PETERSON: Did you --
 4 THE REPORTER: (Nodding head up and down.)
 5 Q. BY MR. EGAN: Okay. Did you walk through the
 6 front yard?
 7 A. Yes.
 8 Q. Did you notice any wet and soggy conditions in
 9 the front yard?
 10 A. The, the -- I'm not sure if it's actually
 11 Mr. Wood's property or not, but where the discharge pipe
 12 runs out is basically on the corner of Jon Way and East
 13 Hidden Lakes, I guess. And that area ever since the
 14 installation of the, of the sump pump is wet constantly.
 15 Q. And as you stated earlier, you have not worked in
 16 any other back yards in Hidden Lakes Estates --
 17 A. No, I have not.
 18 Q. -- in the past?
 19 A. Not to my recollection. I don't remember doing
 20 any other work there.
 21 Q. Did you have any concerns with installing the sod
 22 on the property after you installed the drains?
 23 A. Trick question. No. No, I don't believe so. I
 24 mean as, as the pictures, as the pictures detail, the
 25 ground is not in a saturated state prior to the

*** Notes ***

1 installation of the sod. It, it looks a hundred percent
 2 dry.
 3 Q. So at the time, you had that same opinion without
 4 looking at --
 5 A. I would assume so. I mean I don't remember
 6 having any, any questions about doing it.
 7 Q. Okay. Were there any other proposals for the
 8 back yard besides installing the French drain and the
 9 runoff --
 10 MR. PETERSON: You mean other than what's --
 11 Q. BY MR. EGAN: Other than what's here. I mean
 12 were there any other thoughts or ideas by either yourself
 13 or Mr. Wood?
 14 A. No, I don't believe so.
 15 Q. Alternatives?
 16 A. Alternatives, no.
 17 Q. Okay. Okay. That's all I have.
 18 EXAMINATION BY MR. PETERSON
 19 Q. When you were doing -- or I should say your crew
 20 was doing the related excavation for the drainage system
 21 and, and such, did you discover a, a big 55-gallon drum
 22 buried on the property?
 23 A. Yes, we did.
 24 Q. And where was that?
 25 A. That was in the general location of where the

1 sump is located now.
 2 Q. And I take it that was discovered accidentally?
 3 A. Yes, that's correct.
 4 Q. In other words, you didn't know it was there; no
 5 one, so far as you knew, knew it was there?
 6 A. Correct.
 7 Q. And --
 8 A. I was never advised of it until we unburied it.
 9 Q. And what can you tell me about what you observed
 10 when you unburied this drum?
 11 A. There was a -- there was a -- there was a -- it
 12 was a, I don't know, 50-gallon drum. If, if I remember
 13 correctly, there was, there was not, there was not any
 14 electrical to it. There was no, there was no sump pump to
 15 it. There was a bunch of -- it was surrounded with gravel,
 16 and it was perforated. There were holes in it.
 17 Q. Let me ask you, was it your opinion or conclusion
 18 upon looking at the drum that it was put there as a
 19 drainage collection vessel or something similar to that?
 20 A. Yeah, that's what you would assume. Its location
 21 on the property was the lowest point of the property, so,
 22 yes, that would make sense.
 23 Q. And the perforations that you saw, are we talking
 24 about a high concentration of punctures in the drum?
 25 A. I can't, I can't remember. They, they were

*** Notes ***

1 punctures. They were not -- it was definitely man-made --
 2 Q. Okay.
 3 A. -- per se; it was jerry-rigged.
 4 Q. Okay.
 5 A. It wasn't --
 6 Q. That's a reasonably good word, I think.
 7 Did it appear to you from the way the holes were
 8 made in the drum that they were put there intentionally
 9 to --
 10 A. Yes.
 11 Q. -- to collect water?
 12 A. Yes.
 13 Q. Were you involved in the disposal of the drum
 14 after it was unearthed?
 15 A. I don't know. I, I, I don't know if, if we
 16 unburied it and hauled it away or, or if it was left in the
 17 ground and, and we placed our sump off, off to the side of
 18 it. I can't remember.
 19 Q. Was it -- so you don't actually, then, recall or
 20 have a visual memory of taking the drum out of the ground?
 21 A. Correct.
 22 Q. Okay. That might have happened; you just don't
 23 recall?
 24 A. Correct.
 25 Q. Okay. Do you recall -- independent of whether

1 the drum was removed from the ground, do you recall whether
 2 it was full of water?
 3 A. Oh, yeah. It was, it was -- it, it contributed
 4 to the amounts of water coming into the sump. Because when
 5 we dug our sump, that's when we discovered it and, and the
 6 water just kept leaching out of the rock and out of the
 7 drum.
 8 Q. Okay. You indicated that the sump and the sump
 9 pump that you installed or I should say your company
 10 installed.
 11 A. Um-hmm.
 12 Q. Did you have any perception at the time it was
 13 installed or at later times how often that pump kicked on?
 14 A. Continually, almost -- I observed it kick on, run
 15 for ten minutes, be off for five, be on for another ten.
 16 Q. And you said this was a flotation-activated pump,
 17 right?
 18 A. Correct.
 19 Q. Did it have a mercury type float on it or --
 20 A. I'm not sure. It's a, it's a wire with a round
 21 approximately two-inch diameter float on it; and when it
 22 comes up, it kicks it on.
 23 Q. It's like the old toilet tank --
 24 A. Yes.
 25 Q. -- float?

*** Notes ***

1 REPORTER'S CERTIFICATE

2

3 I certify that the witness in the foregoing

4 deposition,

5 GEOFF CAMPBELL

6 was by me duly sworn to testify the truth, the whole truth,

7 and nothing but the truth in the within-entitled cause;

8 that said deposition was taken at the time and place

9 therein named; that the testimony of said witness was

10 reported by me, a duly certified shorthand reporter and a

11 disinterested person, and was thereafter transcribed into

12 typewriting, to the best of my ability.

13 I further certify that I am not of counsel for

14 attorney for either or any of the parties to said

15 deposition, nor in any way interested in the outcome of the

16 cause named in said caption.

17 IN WITNESS WHEREOF, I have hereunto set my hand

18 this 21st day of July 2004.

19

20

21

22

23 _____

24 Tobie Sterling, CSR No. 4019

25 Certified Shorthand Reporter
State of California

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1 STERLING & ASSOCIATES
101 Orange Street, Suite A
Auburn, California 95603
(530) 888-8822

2

3

4 July 21, 2005

5

6 Geoff Campbell
C & R Landscape
P. O. Box 776
Rocklin, California 95677

7

8 Re: Wood v. Hidden Lakes Estates HOA

9 Dear Mr. Campbell:

10 Your deposition, taken July 7, 2005, has been transcribed.

11 You may wish to confer with your attorney whether he/she

12 requires that it be read, corrected, if necessary, and

13 signed before it is sealed.

14 It is our policy not to release the original transcript

15 from our office. If you do wish to read the transcript,

16 you may:

17 1) Contact our office to make an appointment; or

18 2) Read your attorney's copy and notify this

19 office by mail of any changes. (There is a

20 form at the back of the transcript you may use

21 to indicate changes and sign.)

22 If we do not hear from you within 30 days of today's date,

23 your deposition will be sealed and forwarded to the

24 noticing attorney, Kenneth A. Jones, Esq.

25

Very truly yours,

Tobie Sterling CSR #4019

cc: Kenneth A. Jones, Esq.
Glenn W. Peterson, Esq.
Chris Egan, Esq.

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*** Notes ***

1 STERLING & ASSOCIATES
101 Orange Street, Suite A
Auburn, California 95603
(530) 888-8822

2

3

4 DEPONENT'S SIGNATURE/CHANGE FORM

5 DEPOSITION OF: GEOFF CAMPBELL
CASE: WOOD V. HIDDEN LAKES ESTATES HOA
DATE OF DEPOSITION: JULY 7, 2005

6

7 I have no changes to my deposition.

8 Following are the changes I wish to make to my

9 deposition:

SIGNATURE			DATE
PAGE	LINE	CHANGE	
11			
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1 STERLING & ASSOCIATES

2

3 ---oO---

4 CHECK ONE:

5 _____ Deponent waived signature on record.

6

7 _____ I certify the deponent failed to appear

8 to read, correct or sign his/her

9 deposition.

10 _____ I certify the deponent appeared to read

11 the deposition and has made any changes

12 indicated herein.

13 _____ I certify the deponent responded by mail

14 that he/she read the deposition and the

15 response is attached hereto.

16 _____ I certify the deponent appeared and read

17 the deposition but refused to sign the

18 deposition.

19 By _____

20 STERLING & ASSOCIATES

21 Date _____

22

---oO---

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*** Notes ***