sample

While working for the employer who is the defendant in this case, the applicant’s general job duties were to assist in the demolition of houses, dig ditches, drainage and generalized construction. The applicant would take two breaks per day as per set forth in his deposition transcript and those would be at 9:15 and 12:30 p.m.

Before working for this defendant, the applicant worked at his present employer, Juan’s Peruvian Horse Ranch, for approximately eight years.

With respect to the date of injury, the applicant testified in his deposition that for the date of injury 8/20/2016 he does not recall the events or even the week leading up to it. He could not recall the names of any of his coworkers or any activities around the event. He has also not spoken to anyone from that employment since the date of injury.