

Q&A #12

1 THE COURT: Will you give us your name for the  
2 record, and please spell the last name.

3 THE WITNESS: Paul Hamilton, H-a-m-i-l-t-o-n.

4 THE COURT: You may proceed, Mr. Preston.

5 BY MR. PRESTON:

6 Q Mr. Hamilton, where do you live?

7 A I live at 2415 Forest Avenue.

8 Q And what is your occupation, please?

9 A I am a lawyer.

10 Q Okay. Now, on December the 13<sup>th</sup>, 2017, at about  
11 5:00 o'clock, were you driving an automobile north on  
12 Archer Avenue?

13 A Yes, sir.

14 Q Where were you coming from?

15 A From my office.

16 MR. DIXION: Was anyone in the car with you?

17 THE WITNESS: No, sir.

18 BY MR. PRESTON:

19 Q Okay. Now, where were you going to?

20 A I was going home.

21 Q You had made this trip many times before?

22 MR. DIXION: I object. Speculation, your Honor.

23 THE COURT: Sustained. Rephrase your question, Mr.  
24 Preston.

25 BY MR. PRESTON:

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1 Q All right. Had you made this trip many times  
2 before, Mr. Hamilton?

3 A Oh, yes.

4 THE COURT: How many times, would you say?

5 THE WITNESS: At least 200, your Honor.

6 BY MR. PRESTON:

7 Q Now, how was the weather that night?

8 A It was a dark, rainy night.

9 Q Did there come a time when the car ahead of you  
10 came to a stop?

11 A Yes, sir.

12 Q What kind of a stop did the car ahead of you  
13 make?

14 MR. DIXION: Objection.

15 THE COURT: Overruled. Please answer, Mr. Hamilton.

16 THE WITNESS: The stop was very sudden.

17 BY MR. PRESTON:

18 Q All right. Then what happened?

19 A I jammed on my brakes and tried to turn to avoid  
20 a collision.

21 THE COURT: You tried to turn to avoid a collision?

22 THE WITNESS: Yes, your Honor.

23 THE COURT: Which way did you turn your wheel?

24 THE WITNESS: To the right.

25 THE COURT: Why did you turn to the right?

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1           THE WITNESS: I turned to the right because there was  
2 no traffic in that lane, and I knew I would not damage  
3 any car or injure anybody.

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