



1 CHRISTOPHER J. WALL,  
 2 Of lawful age, being first duly  
 3 cautioned and solemnly sworn as  
 4 hereinafter certified, was examined  
 5 and testified as follows:  
 6 (Witness' response to oath - "I do.")  
 7 DIRECT EXAMINATION  
 8 BY MR. HASAN:  
 9 Q. All right. Will you please state and spell  
 10 your name for the record?  
 11 A. **Christopher Wall. C-h-r-i-s-t-o-p-h-e-r,**  
 12 **W-a-l-l.**  
 13 Q. Is it all right if I call you Chris?  
 14 A. **Absolutely.**  
 15 Q. Chris, we met a couple of weeks ago, so I  
 16 know that you have been through a deposition before.  
 17 A. **Yes.**  
 18 Q. I won't go over all of the background. We  
 19 can save ourselves a little bit of time.  
 20 A. **Okay.**  
 21 Q. Anything about your physical, emotional or  
 22 mental conditions that will keep you from  
 23 understanding my questions?  
 24 A. **No.**  
 25 Q. Same question, but that will keep you from  
 giving me truthful and complete answers?

1 A. **Nope.**  
 2 Q. Same question, but more specifically any  
 3 medication or alcohol that will keep you from  
 4 understanding my questions?  
 5 A. **No.**  
 6 Q. Any medication or alcohol that will keep you  
 7 from answering them truthfully?  
 8 A. **No.**  
 9 Q. Did you prepare for today's deposition?  
 10 A. **No.**  
 11 Q. Did you -- so you mentioned earlier that you  
 12 didn't receive a subpoena. I am going to pass you --  
 13 we'll mark it first.  
 14 (Exhibit Number 7 was  
 15 marked for identification.)  
 16 Q. (By Mr. Hasan) I am going to hand you  
 17 what's been marked as Exhibit 7. I know you  
 18 mentioned earlier that you didn't see a subpoena or  
 19 anything like that. Have you seen this document  
 20 before?  
 21 A. **No.**  
 22 Q. Okay. I will direct your attention  
 23 specifically -- take your time to review it --  
 24 A. **Okay.**  
 25 Q. -- but I will direct your attention

1 specifically to where it says "Topic," and then  
 2 there's a bullet. Do you see where I am talking  
 3 about?  
 4 A. **Yeah.**  
 5 Q. Read that to yourself, and let me know when  
 6 you're done, please.  
 7 A. **Okay.**  
 8 Q. Okay. So are you aware of why you're here  
 9 this morning?  
 10 A. **I am now.**  
 11 Q. Okay. Well, so you didn't receive this  
 12 subpoena; right?  
 13 A. **No.**  
 14 Q. Do you -- are you prepared to testify as to  
 15 the topic, the information that's listed in that  
 16 topic right there?  
 17 A. **I can certainly tell you all I know.**  
 18 Q. Okay. Do you have -- is there additional  
 19 information that you could look at to better testify  
 20 to this topic?  
 21 A. **No.**  
 22 Q. So you feel fully prepared to give me  
 23 information that -- about the information that's  
 24 listed there?  
 25 A. **Yeah.**

1 Q. Okay. All right. Let's just jump right in  
 2 then. Does the city or animal control track dog  
 3 bites in Sioux City?  
 4 A. **We have a record of animal bites and**  
 5 **numbers, but the numbers that we have do not**  
 6 **differentiate between cats, dogs, squirrels,**  
 7 **raccoons. They are all down as bites.**  
 8 Q. Can you tell me a little more about that  
 9 process, how you keep track of those?  
 10 A. **Every morning my colleague, Kenna Anderson,**  
 11 **or I do it if she is not working, she will take the**  
 12 **reports from the previous day. She splits the**  
 13 **reports up into different sections, productive calls,**  
 14 **nonproductive calls, number of dog bites, number**  
 15 **of -- sorry, number of bites, whether it be dog, cat,**  
 16 **squirrel, like I said earlier. Then she takes into**  
 17 **account dogs impounded, cats impounded and all that**  
 18 **kind of stuff, gives that information to Cindy, who**  
 19 **then enters it into the computer system.**  
 20 Q. What are productive versus nonproductive  
 21 calls? What does that mean?  
 22 A. **Right. Right. A productive call, somebody**  
 23 **calls in, stray dog running loose. We go out there.**  
 24 **We're able to find the dog. We impound a dog.**  
 25 **That's a productive call. Other -- likewise, we go**

1 **out there. The dog has run away. We can't find it,**  
 2 **and we are unable to locate dog, unproductive call.**  
 3 **There are two examples of it.**

4 Q. Okay. So let's talk specifically about  
 5 bites, animal bites.

6 **A. Uh-huh.**

7 Q. How are those recorded in the first place?  
 8 So, I mean, how do animal control or the city track  
 9 whether there has been a bite?

10 **A. So when the animal control officer goes out**  
 11 **to the address or to the complainant, we fill out a**  
 12 **bite report which basically logs the complainant's**  
 13 **name, address, phone number, date of birth, what**  
 14 **happened, description of the dog.**

15 **And then on the bottom of the form we put**  
 16 **the owner of the dog and whether the dog is current**  
 17 **on rabies and all that kind of stuff. Again, it**  
 18 **depends, providing that we know where the dog is.**  
 19 **And in a few cases dog bites themselves are**  
 20 **unproductive insofar as the stray dog will come up,**  
 21 **will bite somebody, will run away. We're unable to**  
 22 **locate the dog, you know, in which case we'll drive**  
 23 **the area looking for that dog, but in a few of the**  
 24 **cases we're unable to locate it; so we don't know**  
 25 **that information.**

1 Q. Okay. I want to make sure I understand you  
 2 correctly because – well, I think the examples, all  
 3 of the examples you just gave were about dogs; is  
 4 that right?

5 **A. Right.**

6 Q. Earlier you said that you track bites by all  
 7 animals, though?

8 **A. Yeah. Yeah. Dogs I used for a reference.**  
 9 **Same thing can happen with a cat. So these – the**  
 10 **squirrels and raccoons we make a note of as well.**  
 11 **Again, it's kind of critical that the victim doesn't**  
 12 **lose sight of squirrels and raccoons because we need**  
 13 **them to test for rabies or for the health department**  
 14 **to test them for rabies.**

15 Q. Okay. Yeah. Do you get a lot of squirrel  
 16 and raccoon bites?

17 **A. Yeah. A couple. There's been a couple,**  
 18 **yeah. One of – one of our officers was bitten by a**  
 19 **raccoon a few years ago and we had to put them**  
 20 **through rabies shots.**

21 Q. Okay. So for dog bites, what kind of  
 22 information does the bite report track?

23 **A. The bite report says the type of the dog or**  
 24 **a description of the dog that we have. We have the**  
 25 **owner's name, address, telephone number and its**

1 **status as far as the rabies, whether the rabies is up**  
 2 **to date or not, whether it has a rabies tag,**  
 3 **expiration date, a veterinarian who issued it.**

4 Q. So for the description or type of dog, what  
 5 kind of information goes there? Or, first off, let  
 6 me backtrack.

7 The bite report, are these discrete fields  
 8 that are filled out like –

9 **A. Yeah.**

10 Q. – please provide this information, and one  
 11 of those fields is the description or type of dog?

12 **A. It's a – it's a prewritten or preprinted**  
 13 **form with lines where the animal control officer will**  
 14 **fill in the – fill in the gaps.**

15 Q. So the description or a type of dog, what  
 16 goes there?

17 **A. Depends on what we find. If it was in the**  
 18 **case of a stray dog and all that we're able to**  
 19 **ascertain from the victim was, for example, a big**  
 20 **brown dog, if they're not familiar with their breeds,**  
 21 **big brown dog is what goes in the description because**  
 22 **that's the only information that we have.**

23 **And in other – in other cases, you know, if**  
 24 **it's a Shih Tzu or something like that that bites**  
 25 **somebody, then the description of the dog – and if**

1 **we – we do know the owner of the dog and we say,**  
 2 **okay, your dog was just involved in a dog bite, in**  
 3 **the majority of cases they already know about it, but**  
 4 **they'll give us the dog's name and along with any**  
 5 **shot records at that time.**

6 Q. So that's if they know where the dog is?

7 **A. If we know where the dog is, yeah.**

8 Q. So if there's a dog bite – just imagining  
 9 the different scenarios. If there's a bite, first  
 10 off, there would be have to be a report of that bite?

11 **A. Yeah.**

12 Q. Would animal control ever know about the  
 13 bites if there was no report?

14 **A. If the people go to the hospital, then the**  
 15 **hospital are mandatory reporters. They will – they**  
 16 **will call it in to us. But if somebody got bit by**  
 17 **the neighbor's dog and they didn't report it and they**  
 18 **didn't go to the hospital, then, ultimately, we**  
 19 **wouldn't know about it.**

20 Q. If the individual were to go to the  
 21 hospital, is there a bite report generated at that  
 22 point?

23 **A. The hospital would call in and say, I have**  
 24 **just had somebody present with a dog bite. We would**  
 25 **send an animal control officer then to the hospital**

1 or to the doctor, surgery, emergency room, wherever  
2 they may be and then fill out a bite report at that  
3 point.

4 Q. So under that circumstance it's probably  
5 safe to say that the dog isn't present when the  
6 animal control officer shows up?

7 **A. Right.**

8 Q. So whether it be at the hospital or out in  
9 the field, if the dog's not present, how does the  
10 animal control officer put down the description of  
11 the type of dog on a dog bite report?

12 **A. If the dog is not located?**

13 Q. Right.

14 **A. We basically take a description from the**  
15 **victim, what did the dog look like, do you happen to**  
16 **know what breed it was. You know, and a lot of**  
17 **people are not necessarily breed savvy. So like I**  
18 **said, even going back earlier, it was a big brown**  
19 **dog. That's all I know is a big brown dog, in which**  
20 **case you go – you know, we – you have trouble**  
21 **trying to sort of identify it.**

22 Q. That makes sense. If the owner provides his  
23 or her opinion on the breed of dog, is that what  
24 would be written down under the description or type  
25 of dog?

1 **A. If the owner gives their opinion as to the**  
2 **breed of dog, in most cases that would – that would**  
3 **go – unless it was something that maybe we didn't**  
4 **feel was accurate. So we'd ask them if they have any**  
5 **vet records and see what the vet paperwork says and**  
6 **that kind of stuff.**

7 Q. Okay. So if the physical bite mark looks  
8 like a crocodile bit someone and the person said it  
9 was a Chihuahua, that's a...

10 **A. Absolutely.**

11 Q. Is that what you're talking about?

12 **A. Sure. Sure.**

13 Q. Or if the exact opposite, if it looks like a  
14 mouse bit someone and they say that it was a Great  
15 Dane?

16 **A. Exactly. Right. Right. Right.**

17 Q. But other than circumstances like that, if  
18 they said it was, you know, a Rottweiler that bit me  
19 and you don't have the dog present, would you write  
20 down Rottweiler?

21 **A. If they – if they knew for sure that it was**  
22 **a Rottweiler, then we'd write Rottweiler down on the**  
23 **paperwork.**

24 Q. You say "if they knew for sure." Is that  
25 something that the animal control officer would

1 inquire further into?

2 **A. If somebody – if somebody says it was a**  
3 **Rottweiler and they specific- – they specifically**  
4 **come up with a breed, then we assume they know what a**  
5 **Rottweiler looks like.**

6 Q. All right. What if the animal control  
7 officer obviously witnesses the dog? What goes into  
8 the description or type of dog? Is it...

9 **A. So if animal control find the dog that was**  
10 **in question, then they will – they will fill out the**  
11 **breed of the dog as they – as they see it.**

12 Q. Based on their own observations?

13 **A. Based on their own observations.**

14 Q. Do they take into consideration what the  
15 owner says?

16 **A. They do. And a lot of time there's very,**  
17 **very little discrepancy between what we think it is**  
18 **and what the owner thinks it is.**

19 Q. Would they look at, like, vet records at  
20 that point?

21 **A. They would to gain access to the rabies**  
22 **information, but our determination or the**  
23 **determination of the breed is not dependent on what**  
24 **the vet has in their paperwork.**

25 Q. Sure. So I guess I am thinking more

1 generally about the circumstances in which an animal  
2 control officer would fill out a bite report and more  
3 specifically how the information would be tracked  
4 because I am thinking that you show up and – well,  
5 actually, why don't you just tell me. For tracking  
6 these bite reports, how exactly do they come about?  
7 Is it people's own dogs or a neighbor's dogs or,  
8 like, will you describe – I am just trying to think  
9 of all of the different possibilities of how...

10 **A. Well, people either get bitten by their own**  
11 **dog, a known neighbor's dog or an unknown dog. Every**  
12 **case that we get depends on – you know, we check the**  
13 **rabies information with the owner of the dog if**  
14 **that's at hand. Excuse me.**

15 **If the dog is current on rabies, then we**  
16 **will normally allow the dog to stay there unless it's**  
17 **been deemed high risk or vicious. If it was just an**  
18 **accidental bite, then the dog may be able to stay**  
19 **with the owner if it is current on rabies, but the**  
20 **rabies information is then collected and the bite is**  
21 **called in to the health department where they will do**  
22 **an at-home quarantine.**

23 **If the owner is unable to provide rabies**  
24 **information, then the dog comes with us to be**  
25 **quarantined at the shelter.**

- 1 Q. How do you figure out the owner information?  
 2 A. **Oh, I was assuming that we were – we knew**  
 3 **who the owner was. If an owner is unknown, then**  
 4 **basically if – if we have the dog but no owner, then**  
 5 **we would impound the dog and basically rely on at**  
 6 **some point – if there's no identification on the**  
 7 **dog, then we're depending upon the owner calling at**  
 8 **some point and saying, hey, I am missing my such and**  
 9 **such dog. And we say, yeah, we did pick one up, but**  
 10 **it was involved in a bite. Do you have the rabies**  
 11 **information? Please bring it to the shelter with**  
 12 **you.**  
 13 Q. Do you track the severity of the bite?  
 14 A. **No.**  
 15 Q. So in these bite reports it's just whether  
 16 there was a bite or not?  
 17 A. **Right.**  
 18 Q. It's not that the bite resulted in this  
 19 injury?  
 20 A. **No. The bite reports that we – that we**  
 21 **have – now, the bite reports that we have will say**  
 22 **bites to forearm, bite to leg, that kind of thing,**  
 23 **but it doesn't actually say nasty bite, needed 20**  
 24 **stitches, that kind of – that kind of thing. So it**  
 25 **just basically gives a very basic description of the**

- 1 **wound.**  
 2 Q. So other than the description of the dog,  
 3 the owner's information, the description of the bite  
 4 location and the rabies or vet information, is there  
 5 anything else that goes into these bite reports?  
 6 A. **Victim's name, address, telephone number,**  
 7 **date of birth, date of incident, incident report**  
 8 **number, a description of the dog, description of the**  
 9 **wound, victim's name, address, contact telephone**  
 10 **number, age. We put on the parent or guardian's name**  
 11 **if the victim is a minor. Rabies information. I**  
 12 **think that's pretty much it.**  
 13 Q. So contact information?  
 14 A. **Contact information. Yeah.**  
 15 Q. Does the city keep these records – or, how  
 16 do they keep the records, animal control or city?  
 17 A. **We keep the copy of the bite report which is**  
 18 **attached to the incident report with the actual**  
 19 **officer that went out to the call. And they're kept**  
 20 **in the manual filing system that we have.**  
 21 Q. And so it's a manual filing system?  
 22 A. **Yeah.**  
 23 Q. Are they recorded electronically?  
 24 A. **Not insofar as – only the actual numbers.**  
 25 **Not details of – I am not able to pull anything and**

- 1 **see how many Labs bit last year. I don't have that.**  
 2 Q. I mean, how about more generally than that?  
 3 Is – do you have any way to say how many dogs bit  
 4 last year?  
 5 A. **No.**  
 6 Q. So it's just animals, how many animals bit  
 7 within a certain year?  
 8 A. **Right.**  
 9 Q. So is it fair to say for calendar year 2017  
 10 every bite report gets almost, like, a tally saying  
 11 we have this many bite reports, and at the end of the  
 12 year you can go back and see how many bites there  
 13 were total?  
 14 A. **Cind- – Cindy's – because of Cindy's daily**  
 15 **entry on her – on her computer, she's able to pull**  
 16 **up. And then she's got every year from 2000 or maybe**  
 17 **even before. She can say, okay, there were 150**  
 18 **dog – or, I am sorry, 150 bites last year, but we're**  
 19 **not able to split that 150 up and say X amount were**  
 20 **dogs, X amount were cats, squirrels, raccoons or**  
 21 **snakes or anything else.**  
 22 Q. So if you can't split it up by animal  
 23 type –  
 24 A. **Right.**  
 25 Q. – is it fair to say that the records – you

- 1 can't split them up by breed of dog?  
 2 A. **Correct.**  
 3 Q. Similarly, you can't keep track of how  
 4 severe bites would be by breed?  
 5 A. **Correct.**  
 6 Q. Because you can't track by breed?  
 7 A. **Right.**  
 8 Q. Are there ever times when you aggregate the  
 9 data together, go back and actually manually look  
 10 through the records to see how many bites came from  
 11 certain animals?  
 12 A. **We don't have time to do it, to be honest.**  
 13 Q. So, no?  
 14 A. **No. No.**  
 15 Q. Has that ever been done within animal  
 16 control?  
 17 A. **No.**  
 18 Q. How far back did you say that these records  
 19 go?  
 20 A. **In the – in the filing cabinet?**  
 21 Q. (Nods head up and down.)  
 22 A. **We keep them typically for five years.**  
 23 Q. But then Cindy, you said, has on her  
 24 computer...  
 25 A. **Cindy has on her computer – she can**

1 probably pull up from 2000, I am guessing, if not –  
 2 if not even before. Now, Cindy's computer runs  
 3 fiscally from July 1 to June 30.  
 4 Q. Okay.  
 5 A. Because that – that's our fiscal year. So  
 6 she could provide those numbers, but, again, they are  
 7 just numbers –  
 8 Q. For total animal bites?  
 9 A. – for total animal bites.  
 10 Q. The pit bull ban went into effect in 2008 or  
 11 2009; right?  
 12 A. Uh-huh. Yeah.  
 13 Q. So Cindy would have records of total number  
 14 of animal bites before and after?  
 15 A. I believe so.  
 16 Q. What were the statistics for total number of  
 17 bites before? Do you know that?  
 18 A. I don't know.  
 19 Q. Do you know if there was a change after the  
 20 ban went into effect?  
 21 A. I don't know.  
 22 Q. But it would be impossible to figure out  
 23 whether any change was related to the ban because  
 24 there's no information on breed; right?  
 25 A. Correct.


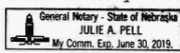
1 Q. So there's no empirical way to check whether  
 2 the pit bull ban actually decreases the number of  
 3 bites?  
 4 A. Not from the information that we have at the  
 5 shelter. But when a dog is called in for quarantine,  
 6 the – all the information from the bite report is  
 7 relayed to the health department. Now, they may or  
 8 may not have that information. I don't know how they  
 9 computer log or file that information. They may be  
 10 able to pull that information, but we couldn't.  
 11 Q. But as far as animal control goes, there's  
 12 no way to track that?  
 13 A. No.  
 14 Q. And, similarly, there would be no way to  
 15 track for severity of bite, whether there have been  
 16 less severe bites?  
 17 A. No. It – basically, it's what was deemed  
 18 as a bite in terms of quarantine, if it breaks the  
 19 skin. And other than that, you know, it might be a  
 20 nip –  
 21 Q. So...  
 22 A. – or it might be a – as I said last week,  
 23 a more worthwhile bite.  
 24 Q. A more worthwhile. Right. So going back to  
 25 what you were talking about as far as the bite report

1 goes, every dog that breaks the skin – is every dog  
 2 that breaks the skin quarantined?  
 3 A. Every dog that breaks the skin and we are  
 4 able to locate and identify the dog is either  
 5 quarantined at the shelter or at the owner's  
 6 residence, depending on its rabies status.  
 7 Q. Is every quarantined dog – is that  
 8 information relayed to the health department?  
 9 A. Yes. It's the health department that would  
 10 perform the quarantine.  
 11 Q. Okay. So every dog that can be located  
 12 after a bite that had broken the skin, there will be  
 13 information with the health department on that dog?  
 14 A. Correct.  
 15 Q. But if there was no skin broken or,  
 16 obviously, if it was not reported, that won't –  
 17 information won't be with the health department?  
 18 A. Correct. Or if it was a stray dog that ran  
 19 away and we never located it or knew where the dog  
 20 lived or the owners lived, if the dog wasn't there  
 21 and we never located it, then they wouldn't have that  
 22 information.  
 23 MR. HASAN: Can we go off the record really  
 24 quick?  
 25

1 (At 9:33 a.m. an  
 2 off-the-record discussion  
 3 was had.)  
 4 Q. (By Mr. Hasan) Chris, is the health  
 5 department a part of the city?  
 6 A. I believe it's a state entity.  
 7 Q. So separate from your capacity?  
 8 A. Oh, absolutely.  
 9 Q. And separate from your capacity here today  
 10 for purposes of this deposition?  
 11 A. Correct.  
 12 MR. HASAN: Let's take a quick break before  
 13 we wrap up. I just want to see if I have got  
 14 anything else for you.  
 15 THE WITNESS: Sure.  
 16 (A recess was taken from  
 17 9:35 a.m. to 9:36 a.m.)  
 18 MR. HASAN: I don't have any further  
 19 questions for you today, Chris.  
 20 THE WITNESS: Okay.  
 21 MR. HASAN: Any follow-up, Justin?  
 22 MR. VONDRAK: I do have some follow-up.  
 23 THE WITNESS: Okay.  
 24 CROSS-EXAMINATION  
 25 BY MR. VONDRAK:  
 26 Q. Chris, a lot of questions of Cameron's were

1 basically that you have no way to track bites by dog  
 2 via a quick computer search.  
 3 **A. Correct.**  
 4 Q. But there are hard copies of all of those  
 5 documents; correct?  
 6 **A. Correct. Yes.**  
 7 Q. So it wouldn't be unreasonable for somebody  
 8 to go through every one of those records and be able  
 9 to --  
 10 **A. Yeah, that...**  
 11 Q. -- classify them as a dog bite, as a  
 12 squirrel bite, as a mouse bite?  
 13 **A. Yeah. Absolutely.**  
 14 Q. Okay. And so while you're not aware that a  
 15 search has been done, would it be safe to say, with  
 16 some legwork, that data could be...  
 17 **A. With some legwork, that information could be**  
 18 **provided or obtained.**  
 19 MR. VONDRAK: Thank you.  
 20 REDIRECT EXAMINATION  
 21 BY MR. HASAN:  
 22 Q. I do have a follow-up because I want to make  
 23 sure I understood your testimony before. You said  
 24 that the hard copies are -- how long are the hard  
 25 copies kept?

1 **A. Five years.**  
 2 Q. So they would only go back, as of today, to  
 3 2012?  
 4 **A. Right.**  
 5 Q. Which would have been after the pit bull ban  
 6 was enacted?  
 7 **A. Correct.**  
 8 Q. And aside from doing a hard copy search, the  
 9 only information that is aggregated is the total  
 10 number of animal bites?  
 11 **A. Correct.**  
 12 MR. HASAN: Okay. Thanks. So you have --  
 13 you are a 30(b)(6) designee witness, but you have the  
 14 right to review and sign, make any corrections that  
 15 you feel are necessary to my questions.  
 16 THE WITNESS: Okay.  
 17 MR. HASAN: I will have you look to Justin.  
 18 MR. VONDRAK: We will do so.  
 19 THE WITNESS: We will do so.  
 20 MR. HASAN: All right. Great.  
 21 THE WITNESS: Thanks.  
 22 (The deposition concluded at 9:38 a.m.)  
 23  
 24  
 25

1 C E R T I F I C A T E  
 2 I, Julie A. Pell, RPR, CRR, CSR, CRC, duly  
 3 commissioned, qualified, and acting under a general  
 4 notarial commission within and for the State of  
 5 Nebraska, do hereby certify that:  
 6 CHRISTOPHER J. WALL  
 7 was by me first duly sworn to tell the truth, the  
 8 whole truth, and nothing but the truth; that the  
 9 foregoing deposition was taken by me at the time and  
 10 place herein specified and in accordance with the  
 11 within stipulations; that I am not counsel, attorney,  
 12 or relative of either party or otherwise interested  
 13 in the event of this suit.  
 14 IN TESTIMONY WHEREOF, I have hereunto set my  
 15 hand officially and attached my notarial seal at  
 16 Lincoln, Nebraska, this 5th day of February, 2018.  
 17   
 18 Julie A. Pell, RPR, CRR, CSR  
 19 Nebraska Notary Public  
 20   
 21  
 22  
 23  
 24  
 25

1 AMENDMENT TO DEPOSITION  
 2 CASE: Kali Myers v. City of Sioux City, et al.  
 3 WITNESS: CHRISTOPHER J. WALL \_\_\_\_ No Changes  
 4 The Witness herein states that he/she wishes  
 5 to make the following changes in his/her deposition:  
 6 PAGE LINE CURRENTLY SHOULD REASON  
 7 READS READ FOR CHANGE  
 8 \_\_\_\_\_  
 9 \_\_\_\_\_  
 10 \_\_\_\_\_  
 11 \_\_\_\_\_  
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 16 \_\_\_\_\_  
 17 \_\_\_\_\_  
 18 DEPONENT'S SIGNATURE \_\_\_\_\_  
 19 ACKNOWLEDGEMENT State of \_\_\_\_\_  
 20 County of \_\_\_\_\_  
 21 The foregoing instrument was acknowledged  
 22 before me this \_\_\_\_ day of \_\_\_\_\_, 20\_\_.  
 23 \_\_\_\_\_  
 24 ^ Affix Seal Here ^ GENERAL NOTARY PUBLIC  
 25

<b>1</b>	Affix [1] 28/24 after [4] 21/14 21/19 23/12 26/5 again [3] 9/17 10/11 21/6 age [2] 5/2 18/10 aggregate [1] 20/8 aggregated [1] 26/9 ago [2] 5/14 10/19 agreed [1] 4/2 al [1] 28/2 alcohol [2] 6/3 6/6 allow [1] 16/16 almost [1] 19/10 along [1] 12/4 aloud [1] 4/18 already [1] 12/3 Amendment [2] 3/5 28/1 amount [2] 19/19 19/20 Anderson [1] 8/10 animal [22] 8/2 8/4 9/5 9/8 9/10 11/13 12/12 12/25 13/6 13/10 14/25 15/6 15/9 16/1 18/16 19/22 20/15 21/8 21/9 21/14 22/11 26/10 animals [4] 10/7 19/6 19/6 20/11 answering [1] 6/7 answers [1] 5/25 any [9] 6/2 6/6 12/4 14/4 19/3 21/23 24/17 24/20 26/14 anything [6] 5/20 6/19 18/5 18/25 19/21 24/13 Appearances [1] 3/2 area [1] 9/23 ascertain [1] 11/19 aside [1] 26/8 ask [1] 14/4 Assistant [1] 2/9 assume [1] 15/4 assuming [1] 17/2 at-home [1] 16/22 attached [2] 18/18 27/15 attention [2] 6/22 6/25 attorney [2] 4/11 27/11 Attorneys [1] 2/9 aware [2] 7/8 25/14 away [3] 9/1 9/21 23/19	bottom [1] 9/15 Box [1] 2/10 break [1] 24/11 breaks [4] 22/18 23/1 23/2 23/3 breed [11] 13/16 13/17 13/23 14/2 15/4 15/11 15/23 20/1 20/4 20/6 21/24 breeds [1] 11/20 bring [1] 17/11 broken [2] 23/12 23/15 brown [4] 11/20 11/21 13/18 13/19 bull [3] 21/10 22/2 26/5 bullet [1] 7/2
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<p><b>C</b></p> <p><b>contact</b> [3] 18/9 18/13 18/14</p> <p><b>control</b> [15] 8/2 9/8 9/10 11/13 12/12 12/25 13/6 13/10 14/25 15/6 15/9 16/2 18/16 20/16 22/11</p> <p><b>copies</b> [3] 25/4 25/24 25/25</p> <p><b>copy</b> [3] 4/23 18/17 26/8</p> <p><b>correct</b> [11] 20/2 20/5 21/25 23/14 23/18 24/10 25/3 25/5 25/6 26/7 26/11</p> <p><b>corrections</b> [1] 26/14</p> <p><b>correctly</b> [1] 10/2</p> <p><b>could</b> [4] 7/19 21/6 25/16 25/17</p> <p><b>couldn't</b> [1] 22/10</p> <p><b>counsel</b> [1] 27/11</p> <p><b>County</b> [1] 28/19</p> <p><b>couple</b> [3] 5/14 10/17 10/17</p> <p><b>court</b> [2] 1/1 4/19</p> <p><b>CRC</b> [2] 4/6 27/2</p> <p><b>critical</b> [1] 10/11</p> <p><b>crocodile</b> [1] 14/8</p> <p><b>Cross</b> [2] 3/10 24/23</p> <p><b>Cross-Examination</b> [2] 3/10 24/23</p> <p><b>CRR</b> [2] 4/6 27/2</p> <p><b>CSR</b> [2] 4/6 27/2</p> <p><b>current</b> [3] 9/16 16/15 16/19</p> <p><b>CURRENTLY</b> [1] 28/5</p> <p><b>cv</b> [1] 1/3</p>	<p><b>documents</b> [1] 25/5</p> <p><b>does</b> [5] 8/2 8/21 10/22 13/9 18/15</p> <p><b>doesn't</b> [2] 10/11 17/23</p> <p><b>dog</b> [78]</p> <p><b>dog's</b> [2] 12/4 13/9</p> <p><b>dogs</b> [8] 8/6 8/17 10/3 10/8 16/7 16/7 19/3 19/20</p> <p><b>doing</b> [1] 26/8</p> <p><b>don't</b> [9] 9/24 14/19 16/5 19/1 20/12 21/18 21/21 22/8 24/17</p> <p><b>done</b> [3] 7/6 20/15 25/15</p> <p><b>Douglas</b> [1] 1/21</p> <p><b>down</b> [6] 8/7 13/10 13/24 14/20 14/22 20/21</p> <p><b>drive</b> [1] 9/22</p> <p><b>duly</b> [3] 5/2 27/2 27/7</p>	<p><b>fiscal</b> [1] 21/5</p> <p><b>fiscally</b> [1] 21/3</p> <p><b>five</b> [2] 20/22 26/1</p> <p><b>follow</b> [3] 24/20 24/21 25/22</p> <p><b>follow-up</b> [3] 24/20 24/21 25/22</p> <p><b>following</b> [1] 28/4</p> <p><b>follows</b> [1] 5/3</p> <p><b>forearm</b> [1] 17/22</p> <p><b>foregoing</b> [2] 27/9 28/21</p> <p><b>form</b> [3] 4/13 9/15 11/13</p> <p><b>forth</b> [2] 4/7 4/17</p> <p><b>foundation</b> [1] 4/14</p> <p><b>fully</b> [1] 7/22</p> <p><b>further</b> [2] 15/1 24/17</p>
<p><b>D</b></p> <p><b>daily</b> [1] 19/14</p> <p><b>Dane</b> [1] 14/15</p> <p><b>data</b> [2] 20/9 25/16</p> <p><b>date</b> [6] 1/19 9/13 11/2 11/3 18/7 18/7</p> <p><b>day</b> [3] 8/12 27/16 28/21</p> <p><b>decreases</b> [1] 22/2</p> <p><b>deemed</b> [2] 16/17 22/17</p> <p><b>Defendants</b> [2] 1/9 2/7</p> <p><b>delivered</b> [1] 4/11</p> <p><b>department</b> [8] 10/13 16/21 22/7 23/8 23/9 23/13 23/17 24/4</p> <p><b>dependent</b> [1] 15/23</p> <p><b>depending</b> [2] 17/7 23/6</p> <p><b>depends</b> [3] 9/18 11/17 16/12</p> <p><b>DEPONENT'S</b> [1] 28/17</p> <p><b>deposition</b> [13] 1/13 3/5 4/4 4/8 4/10 4/23 5/15 6/9 24/9 26/22 27/9 28/1 28/4</p> <p><b>describe</b> [1] 16/8</p> <p><b>description</b> [16] 9/14 10/24 11/4 11/11 11/15 11/21 11/25 13/10 13/14 13/24 15/8 17/25 18/2 18/3 18/8 18/8</p> <p><b>designee</b> [1] 26/13</p> <p><b>details</b> [1] 18/25</p> <p><b>determination</b> [2] 15/22 15/23</p> <p><b>did</b> [5] 6/9 6/11 13/15 17/9 20/18</p> <p><b>didn't</b> [6] 6/12 6/18 7/11 12/17 12/18 14/3</p> <p><b>different</b> [3] 8/13 12/9 16/9</p> <p><b>differentiate</b> [1] 8/6</p> <p><b>direct</b> [4] 3/9 5/6 6/22 6/25</p> <p><b>discrepancy</b> [1] 15/17</p> <p><b>discrete</b> [1] 11/7</p> <p><b>discussion</b> [1] 24/1</p> <p><b>DISTRICT</b> [2] 1/1 1/1</p> <p><b>DIVISION</b> [2] 1/2 1/20</p> <p><b>do</b> [28] 4/18 5/4 7/2 7/14 7/18 8/5 8/11 9/8 10/15 12/1 13/15 15/14 15/16 16/6 16/21 17/1 17/10 17/13 18/16 19/3 20/12 21/17 21/19 24/21 25/22 26/18 26/19 27/5</p> <p><b>doctor</b> [1] 13/1</p> <p><b>document</b> [1] 6/19</p>	<p><b>E</b></p> <p><b>E-mail</b> [3] 2/5 2/11 2/12</p> <p><b>earlier</b> [5] 6/11 6/18 8/16 10/6 13/18</p> <p><b>effect</b> [2] 21/10 21/20</p> <p><b>either</b> [3] 16/10 23/4 27/12</p> <p><b>electronically</b> [1] 18/23</p> <p><b>elements</b> [1] 4/15</p> <p><b>else</b> [3] 18/5 19/21 24/13</p> <p><b>emergency</b> [1] 13/1</p> <p><b>emotional</b> [1] 5/20</p> <p><b>empirical</b> [1] 22/1</p> <p><b>enacted</b> [1] 26/6</p> <p><b>end</b> [1] 19/11</p> <p><b>enters</b> [1] 8/19</p> <p><b>entity</b> [1] 24/5</p> <p><b>entry</b> [1] 19/15</p> <p><b>ESQ</b> [3] 2/3 2/8 2/8</p> <p><b>et</b> [1] 28/2</p> <p><b>even</b> [3] 13/18 19/17 21/2</p> <p><b>event</b> [1] 27/13</p> <p><b>ever</b> [3] 12/12 20/8 20/15</p> <p><b>every</b> [10] 8/10 16/11 19/10 19/16 23/1 23/1 23/3 23/7 23/11 25/8</p> <p><b>exact</b> [1] 14/13</p> <p><b>exactly</b> [2] 14/16 16/6</p> <p><b>Examination</b> [6] 3/9 3/10 3/11 5/6 24/23 25/20</p> <p><b>examined</b> [1] 5/3</p> <p><b>example</b> [1] 11/19</p> <p><b>examples</b> [3] 9/3 10/2 10/3</p> <p><b>except</b> [1] 4/13</p> <p><b>Excuse</b> [1] 16/14</p> <p><b>Exhibit</b> [2] 6/14 6/17</p> <p><b>Exhibit 7</b> [1] 6/17</p> <p><b>EXHIBITS</b> [1] 3/13</p> <p><b>expiration</b> [1] 11/3</p>	<p><b>G</b></p> <p><b>gain</b> [1] 15/21</p> <p><b>gaps</b> [1] 11/14</p> <p><b>gave</b> [1] 10/3</p> <p><b>general</b> [2] 27/3 28/24</p> <p><b>generally</b> [2] 16/1 19/2</p> <p><b>generated</b> [1] 12/21</p> <p><b>get</b> [3] 10/15 16/10 16/12</p> <p><b>gets</b> [1] 19/10</p> <p><b>give</b> [2] 7/22 12/4</p> <p><b>gives</b> [3] 8/18 14/1 17/25</p> <p><b>giving</b> [1] 5/25</p> <p><b>go</b> [14] 5/17 8/23 8/25 12/14 12/18 12/20 13/20 14/3 19/12 20/9 20/19 23/23 25/8 26/2</p> <p><b>goes</b> [8] 9/10 11/5 11/16 11/21 15/7 18/5 22/11 23/1</p> <p><b>going</b> [4] 6/12 6/16 13/18 22/24</p> <p><b>got</b> [3] 12/16 19/16 24/12</p> <p><b>Great</b> [2] 14/14 26/20</p> <p><b>guardian's</b> [1] 18/10</p> <p><b>guess</b> [1] 15/25</p> <p><b>guessing</b> [1] 21/1</p>
	<p><b>F</b></p> <p><b>fair</b> [2] 19/9 19/25</p> <p><b>familiar</b> [1] 11/20</p> <p><b>far</b> [4] 11/1 20/18 22/11 22/25</p> <p><b>Fax</b> [2] 2/5 2/11</p> <p><b>February</b> [1] 27/16</p> <p><b>Federal</b> [1] 4/15</p> <p><b>feel</b> [3] 7/22 14/4 26/15</p> <p><b>few</b> [3] 9/19 9/23 10/19</p> <p><b>field</b> [1] 13/9</p> <p><b>fields</b> [2] 11/7 11/11</p> <p><b>figure</b> [2] 17/1 21/22</p> <p><b>file</b> [1] 22/9</p> <p><b>filing</b> [3] 18/20 18/21 20/20</p> <p><b>fill</b> [6] 9/11 11/14 11/14 13/2 15/10 16/2</p> <p><b>filled</b> [1] 11/8</p> <p><b>find</b> [4] 8/24 9/1 11/17 15/9</p> <p><b>first</b> [6] 5/2 6/13 9/7 11/5 12/9 27/7</p>	<p><b>H</b></p> <p><b>Hall</b> [1] 1/20</p> <p><b>hand</b> [3] 6/16 16/14 27/15</p> <p><b>happen</b> [2] 10/9 13/15</p> <p><b>happened</b> [1] 9/14</p> <p><b>hard</b> [4] 25/4 25/24 25/24 26/8</p> <p><b>has</b> [8] 9/1 9/9 11/2 15/24 20/15 20/23 20/25 25/15</p> <p><b>HASAN</b> [4] 2/3 3/9 3/11 4/11</p> <p><b>have</b> [37]</p> <p><b>he/she</b> [1] 28/4</p> <p><b>head</b> [1] 20/21</p> <p><b>health</b> [8] 10/13 16/21 22/7 23/8 23/9 23/13 23/17 24/3</p> <p><b>here</b> [3] 7/8 24/8 28/24</p> <p><b>hereby</b> [1] 27/5</p> <p><b>herein</b> [2] 27/10 28/4</p> <p><b>hereinafter</b> [1] 5/3</p> <p><b>hereof</b> [1] 4/7</p> <p><b>hereto</b> [1] 4/3</p> <p><b>hereunto</b> [1] 27/14</p> <p><b>hey</b> [1] 17/8</p> <p><b>high</b> [1] 16/17</p> <p><b>his</b> [3] 1/7 13/22 28/4</p> <p><b>his/her</b> [1] 28/4</p> <p><b>home</b> [1] 16/22</p> <p><b>honest</b> [1] 20/12</p> <p><b>hospital</b> [7] 12/14 12/15 12/18 12/21 12/23 12/25 13/8</p> <p><b>how</b> [19] 8/9 9/7 9/8 13/9 16/3 16/6 16/9 17/1 18/15 19/1 19/2 19/3 19/6 19/12 20/3 20/10 20/18 22/8 25/24</p> <p><b>huh</b> [2] 9/6 21/12</p> <p><b>Husch</b> [1] 2/3</p>

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<b>K</b>		
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