INTERACTIVE MEDIATION BRIEF

Fourteen Hours Out, In Suit

The same case eight months later. Three witnesses have testified, the carrier has produced its files, and each answer under oath now sits beside the document that meets it.

MATTER	Aldaco v. Halden-Voss Freight Lines, Inc. and Dale R. Pruitt, No. 26-CV-0318
FORUM	Circuit Court for Calder County, State of Franklin. Mediation set for October 27, 2026
WRITTEN FOR	The mediator and counsel for the defendants
DATED	October 20, 2026
PREPARED BY	Counsel for the plaintiff, Carmen Aldaco. Your firm's name and letterhead sit here.
RECORD	23 exhibits; the 28 cited pages are attached below.

Confidential mediation statement under Franklin Rule of Evidence 408 and the court's mediation order.

> **Composite sample.** Every person, company, place, document and number here is invented to show the form. It is set in the State of Franklin, a jurisdiction that does not exist.

01 The person

02 What happened

03 Why it happened

04 What they knew

05 The harm

06 The numbers

07 The ask

BEAT 01 · THE PERSON

Carmen Aldaco is 42. A year ago she led 142 students onto a field.

She has directed the bands at Calder Valley High School since 2008. [ALD-EMP-0002] On October 9, 2025 a Halden-Voss tractor-trailer struck her stopped car at 58 miles an hour. [FSP-0003] [FSP-0047] The impact burst her first lumbar vertebra. [ALD-MED-0007]

WHO THIS HAPPENED TO

PHOTOGRAPH GOES HERE

Ms. Aldaco teaching from a stool, September 2026

Carmen Aldaco

Director of Bands, Calder Valley High School

AGE	42 at mediation
INJURY	Burst fracture of L1, fused T12 to L2; plated left wrist
TODAY	Teaching full time. Marching band reassigned.
POSTURE	Liability testimony complete. Trial set for January 2027.

One year on, the fusion has held and the pain has not left.

Her surgeon's note of October 14, 2026 records daily pain, permanent limits, and early wear at the level below the fusion. [ALD-MED-0498] [ALD-MED-0498]

ONE YEAR AFTER THE CRASH

EX. 21 · TREATING SURGEON'S ONE-YEAR NOTE — ALD-MED-0498

Imaging	Fusion solid T12 to L2. Early degenerative change at L2-L3, the level below the fusion.
Function	Daily pain, worse with standing. Restrictions permanent: 20 pounds; no standing beyond 20 minutes.
Bills	Charges since February 20, 2026: $44,380 (therapy, injections, imaging).

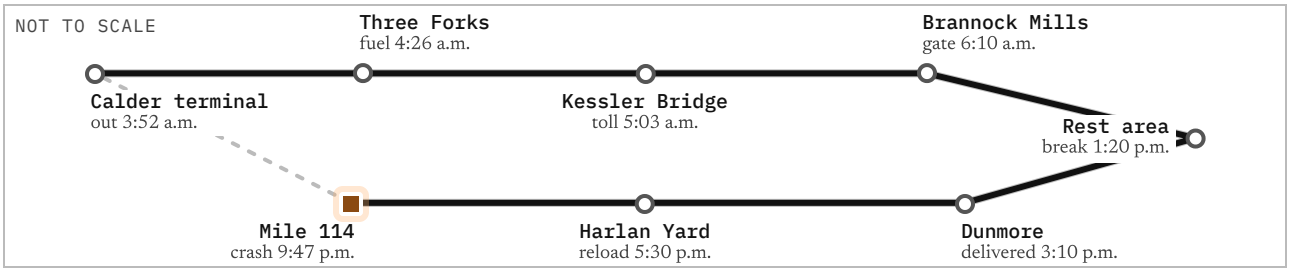
BEAT 02 · WHAT HAPPENED

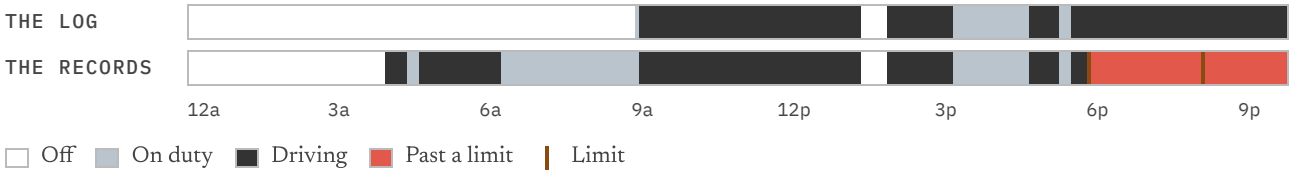
The log begins at 8:50 a.m. The day began at 3:52.

Before suit, three outside records put Dale Pruitt at the wheel for five hours his log leaves out.

[FSP-0061] [FSP-0067] [FSP-0063]

THE TRIP, BY THE LOG AND BY THE RECORDS





	THE LOG	THE RECORDS
STATUS	Driving	Past the limit
AT THE WHEEL	10 h 37 min	12 h 41 min
DAY SO FAR	12 h 57 min	17 h 55 min

12:00 a.m. The truck is parked at the Calder terminal. The log and the records agree.

3:52 a.m. Truck 4417 leaves the terminal. No driver is logged in.

4:26 a.m. Pruitt's fleet card buys diesel in Three Forks. The log has him off duty.

5:03 a.m. The truck's transponder crosses the Kessler Bridge.

6:10 a.m. Pruitt signs the gate sheet at Brannock Mills.

8:50 a.m. Pruitt logs in. By the log, his day starts now.

1:20 p.m. A thirty-minute break. Both accounts agree.

3:10 p.m. Delivered in Dunmore.

4:52 p.m. Dispatch sends him for one more load.

5:52 p.m. Fourteen hours since 3:52 a.m. By rule, his driving day is over.

8:06 p.m. Eleven hours at the wheel.

8:31 p.m. Pruitt texts that his eyes are heavy. Dispatch answers: push through.

9:47 p.m. Impact at mile 114.

October 9, 2025. Top bar: the driver's electronic log. Bottom bar: the day rebuilt from the truck's recorder, a fuel receipt, a toll record and a gate sheet.

He reached the stopped cars 17 hours and 55 minutes into that day.

The engine computer shows cruise control at 66 and the brake still off one second before impact. [FSP-0047] [FSP-0047] The line of cars had been in view for 2,100 feet. [FSP-0096]

Pruitt no longer disputes any of it.

At deposition he said the dispatcher told him not to log in before the mill. [Pruitt Dep. 44:7] He said he had done the same thing a dozen times that year. [Pruitt Dep. 45:2]

Of the last mile he remembers a sign and then the airbag. [Pruitt Dep. 61:14]

THE DRIVER, UNDER OATH

EX. 18 · DEPOSITION OF DALE R. PRUITT — PRUITT DEP. 44 TO 61

44:7	**Q.** Who told you not to log in before the mill? **A.** Lyle. That's how we did the early appointments.
45:2	**Q.** Had you done it before October 9? **A.** A dozen times that year. Maybe more.
61:14	**Q.** What do you remember of the last mile? **A.** I don't. I remember the sign for exit 120, and then the airbag.

BEAT 03 · WHY IT HAPPENED

The dispatcher swore he never told a driver to run unlogged.

Asked whether he had ever told a driver to drive without logging in, Lyle Morrow answered: *No. Never.* [Morrow Dep. 28:9]

His message to Pruitt at 3:41 that morning is on the right. [FSP-0074] Shown the page, he agreed the number was his. [Morrow Dep. 52:16]

THE DISPATCHER: TESTIMONY AND MESSAGE

UNDER OATH, MAY 20, 2026

EX. 19 · DEPOSITION OF LYLE MORROW, DISPATCHER — MORROW DEP. 28 TO 53

28:9 **Q.** Did you ever tell a driver to drive without logging in?
A. No. Never.

HIS MESSAGE, 3:41 A.M.

EX. 5 · MESSAGES BETWEEN PRUITT AND DISPATCH — FSP-0074

Pruitt · 3:40 a.m.
I only got off at 9:40 last night. Thats six hours not ten

Lyle Dispatch · 3:41 a.m.
Dont log in till youre at the mill. Well clean it up on our end.

He swore he goes only by what the system shows.

Morrow testified that the system showed Pruitt legal, and that this is all he goes by. [Morrow Dep. 29:3]

Pruitt had told him in writing that he had been up since 3:30 and was about out. [FSP-0075] Morrow sent him on. [FSP-0075]

THE DISPATCHER: TESTIMONY AND MESSAGE

UNDER OATH, MAY 20, 2026

EX. 19 · DEPOSITION OF LYLE MORROW, DISPATCHER — MORROW DEP. 28 TO 53

29:3 **Q.** Did you know Mr. Pruitt was out of hours that afternoon?
A. The system showed him legal. That's all I go by.

THE MESSAGES, 4:54 P.M.

EX. 5 · MESSAGES BETWEEN PRUITT AND DISPATCH — FSP-0075

Pruitt · 4:54 p.m.
Been up since 3:30. Im about out

Lyle Dispatch · 4:55 p.m.
Tablet shows you good till 10:50. Go.

The pay plan explains the messages.

Halden-Voss paid its dispatchers $40 for each on-time load and docked $60 for each late one. [HVF-000411] [HVF-000411] A driver held for hours of service did not excuse a late load. [HVF-000411]

HOW DISPATCH WAS PAID

EX. 15 · DISPATCHER INCENTIVE PLAN — HVF-000411

On-time load	$40 to the dispatcher
Late load	Minus $60
Service failure, key account	Loss of the month's bonus
Hours-of-service holds	Not an excused delay unless the terminal manager approves in advance

BEAT 04 · WHAT THEY KNEW

Safety swore that every unassigned trip is investigated.

Renee Castellano testified that every event is investigated and assigned to the right driver. [Castellano Dep. 33:5]

The truck's recorder held both trips: 118 miles with no driver. [FSP-0019] The system flagged them at 6:22 a.m. on the day of the crash. [HVF-000304] At 8:14 the next morning she closed both as a yard move. [HVF-000304] She had learned of the crash the night before. [Castellano Dep. 72:4]

THE SAFETY DIRECTOR: TESTIMONY AND AUDIT TRAIL

UNDER OATH, JUNE 3, 2026

EX. 20 · DEPOSITION OF RENEE CASTELLANO, SAFETY DIRECTOR — CASTELLANO DEP. 33 TO 88

33:5 **Q.** How does Halden-Voss handle unassigned driving?
A. Every event is investigated and assigned to the right driver.

HER ENTRY, OCTOBER 10, 8:14 A.M.

EX. 14 · EDIT HISTORY, UNASSIGNED DRIVING, UNIT 4417 — HVF-000304

WHEN	USER	ACTION
Oct 9, 6:22 a.m.	System	Alert to safety inbox: 2 unassigned events, 118 miles
Oct 10, 8:14 a.m.	R. Castellano	Annotated both events: "Yard move / shop road test. No driver assignment."

Thirty-five of thirty-seven were closed the same way.

In the quarter before the crash the fleet logged 37 unassigned trips longer than 20 miles. [HVF-000612] Thirty-five were closed as yard moves. [HVF-000612] One of those yard moves ran 143 miles. [HVF-000612]

Asked how many she assigned to a driver, Castellano answered: *Two.* [Castellano Dep. 88:19]

UNASSIGNED TRIPS OVER 20 MILES, JULY TO SEPTEMBER 2025

37
trips with no driver logged in

35
closed as a “yard move”

2
assigned to a driver

143 mi
the longest “yard move”

Source: the carrier’s own report, HVF-000612.

Pruitt’s own file carried three flags.

Two log audits had matched unassigned trips to Pruitt by his fuel card. [HVF-000540] [HVF-000540] Between them a roadside inspector cited him for a false log. [HVF-000540] That same month the federal agency warned the carrier about hours of service. [PUB-0002]

On these facts the court allowed a claim for punitive damages. [Dkt. 61, page 4]

PRUITT’S FILE BEFORE THE CRASH

EX. 16 · DRIVER QUALIFICATION FILE, DALE R. PRUITT — HVF-000540

DATE	FINDING	ACTION
Nov 2024	Log audit: 3 unassigned trips matched to Pruitt by fuel card	Verbal coaching
Mar 2025	Roadside inspection: cited for false report of duty status	Written warning
Jun 2025	Log audit: 4 unassigned trips matched to Pruitt by fuel card	None recorded

BEAT 05 · THE HARM

The defense examiner agrees on what matters most.

The defendants' own orthopedic examiner found that the collision caused the fracture and that the fusion was necessary. [DEF-IME-0015] He agrees she should not return to the marching field. [DEF-IME-0015]

WHERE THE TWO MEDICAL EXPERTS STAND

Agreed	The crash caused the fracture, and the fusion was necessary.
Agreed	She should not work a marching field again.
Disputed	Whether the hardware will need revision.
Disputed	How long she will need pain care.

Sources: DEF-IME-0015; ALD-LCP-0005; ALD-MED-0498.

The dispute is about the future.

The examiner calls a hardware revision possible, not probable. [DEF-IME-0015] Her surgeon's one-year imaging already shows wear at the level below the fusion. [ALD-MED-0498]

THE DEFENSE EXAMINER'S OPINIONS

EX. 22 · DEFENSE MEDICAL EXAMINATION — DEF-IME-0015

Causation	The L1 fracture and the fusion were caused by the collision. The surgery was necessary.
Work	Can teach full time in a classroom. Marching-field work is not advised.
Future surgery	Hardware revision is possible, not probable.

BEAT 06 · THE NUMBERS

Economic loss now stands at $1,275,190.

Medical bills stood at $386,870 when the demand was sent and have grown by $44,380 since. [ALD-BILL-0002] [ALD-MED-0498] The other figures are unchanged. [ALD-LCP-0005] [ALD-EMP-0019] [ALD-EMP-0019]

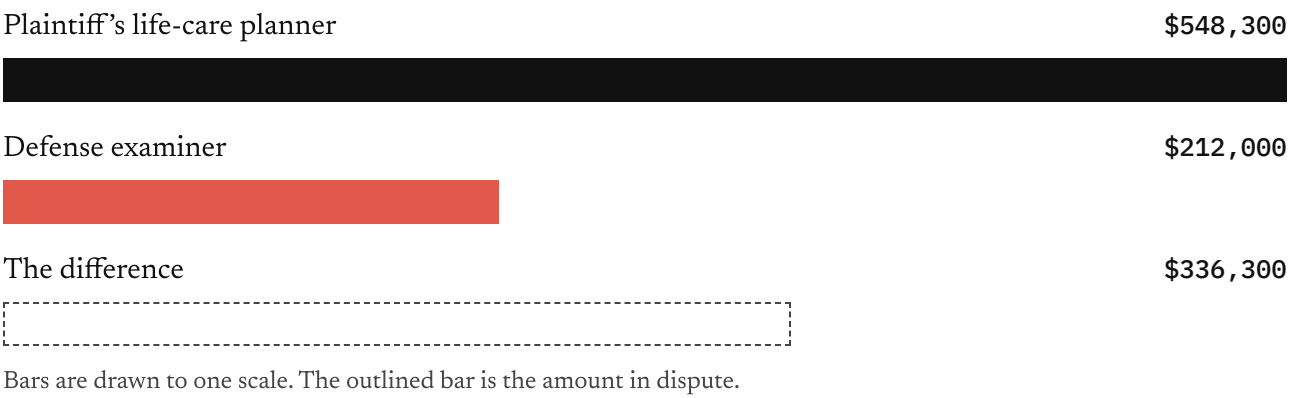
ECONOMIC LOSS, PLAINTIFF'S FIGURES

Medical bills to date through October 14, 2026	$431,250
Future care life-care plan, present value	$548,300
Wages lost during leave	$31,640
Future earnings stipend and summer programs to age 65	$264,000
Economic loss	**$1,275,190**

The defense disputes $336,300 of it.

The defense examiner puts future care at $212,000. [DEF-IME-0015] Accept his figure in full and the economic loss is still $938,890.

FUTURE CARE: THE TWO ESTIMATES



Bars are drawn to one scale. The outlined bar is the amount in dispute.

The limits were on the table, and the exposure has grown since.

The policies total $6,000,000. [INS-0002] [INS-0002] Ms. Aldaco offered to settle for that sum before suit. Since then the court has allowed a punitive claim. [Dkt. 61, page 4]

WHAT A VERDICT PUTS AT RISK

$6,000,000
the limits, offered until March 30, 2026 and refused

Aug 14, 2026
punitive damages allowed into the case

Sources: INS-0002; Dkt. 61.

BEAT 07 · THE ASK

Ms. Aldaco will resolve the case at mediation for $7,250,000.

The figure is above the policy limits because the limits were offered and refused, and the record is stronger now than it was then.

THE DEMAND AT MEDIATION

$7,250,000
to resolve all claims

January 2027
trial setting

Four witnesses, and none of them helps the defense.

The driver admits the practice. [Pruitt Dep. 44:7] The dispatcher denied it and then identified his own message. [Morrow Dep. 28:9] [Morrow Dep. 52:16] The safety director closed the trips as a yard move after she knew of the crash. [Castellano Dep. 71:11] [Castellano Dep. 72:4]

The defendants' examiner concedes causation. [DEF-IME-0015] What remains for trial is the size of the verdict.

WHAT THE JURY WILL HEAR

Driver	"Lyle. That's how we did the early appointments."
Dispatcher	"No. Never." Then his own message.
Safety	"I closed what was in the queue that morning."
Examiner	The defense's own doctor on causation.

FOR COUNSEL

Cite table

Every cited statement in the piece, in reading order, beside the page it rests on. Counsel checks each line and signs off before anything is sent.

NO.	BEAT	STATEMENT	SOURCE	CHECKED
01	The person	She has directed the bands at Calder Valley High School since 2008.	[Ex. 12 · ALD-EMP-0002]	☐
02	The person	On October 9, 2025 a Halden-Voss tractor-trailer struck her stopped car at 58 miles an hour.	[Ex. 1 · FSP-0003] [Ex. 6 · FSP-0047]	☐
03	The person	The impact burst her first lumbar vertebra.	[Ex. 9 · ALD-MED-0007]	☐
04	The person	Her surgeon's note of October 14, 2026 records daily pain, permanent limits, and early wear at the level below the fusion.	[Ex. 21 · ALD-MED-0498] [Ex. 21 · ALD-MED-0498]	☐
05	What happened	Before suit, three outside records put Dale Pruitt at the wheel for five hours his log leaves out.	[Ex. 3 · FSP-0061] [Ex. 4 · FSP-0067] [Ex. 3 · FSP-0063]	☐
06	What happened	The engine computer shows cruise control at 66 and the brake still off one second before impact.	[Ex. 6 · FSP-0047] [Ex. 6 · FSP-0047]	☐
07	What happened	The line of cars had been in view for 2,100 feet.	[Ex. 7 · FSP-0096]	☐
08	What happened	At deposition he said the dispatcher told him not to log in before the mill.	[Ex. 18 · Pruitt Dep. 44:7]	☐
09	What happened	He said he had done the same thing a dozen times that year.	[Ex. 18 · Pruitt Dep. 45:2]	☐
10	What happened	Of the last mile he remembers a sign and then the airbag.	[Ex. 18 · Pruitt Dep. 61:14]	☐
11	Why it happened	Asked whether he had ever told a driver to drive without logging in, Lyle Morrow answered: No. Never.	[Ex. 19 · Morrow Dep. 28:9]	☐

NO.	BEAT	STATEMENT	SOURCE	CHECKED
12	Why it happened	His message to Pruitt at 3:41 that morning is on the right.	[Ex. 5 · FSP-0074]	☐
13	Why it happened	Shown the page, he agreed the number was his.	[Ex. 19 · Morrow Dep. 52:16]	☐
14	Why it happened	Morrow testified that the system showed Pruitt legal, and that this is all he goes by.	[Ex. 19 · Morrow Dep. 29:3]	☐
15	Why it happened	Pruitt had told him in writing that he had been up since 3:30 and was about out.	[Ex. 5 · FSP-0075]	☐
16	Why it happened	Morrow sent him on.	[Ex. 5 · FSP-0075]	☐
17	Why it happened	Halden-Voss paid its dispatchers $40 for each on-time load and docked $60 for each late one.	[Ex. 15 · HVF-000411] [Ex. 15 · HVF-000411]	☐
18	Why it happened	A driver held for hours of service did not excuse a late load.	[Ex. 15 · HVF-000411]	☐
19	What they knew	Renee Castellano testified that every event is investigated and assigned to the right driver.	[Ex. 20 · Castellano Dep. 33:5]	☐
20	What they knew	The truck's recorder held both trips: 118 miles with no driver.	[Ex. 2 · FSP-0019]	☐
21	What they knew	The system flagged them at 6:22 a.m. on the day of the crash.	[Ex. 14 · HVF-000304]	☐
22	What they knew	At 8:14 the next morning she closed both as a yard move.	[Ex. 14 · HVF-000304]	☐
23	What they knew	She had learned of the crash the night before.	[Ex. 20 · Castellano Dep. 72:4]	☐
24	What they knew	In the quarter before the crash the fleet logged 37 unassigned trips longer than 20 miles.	[Ex. 17 · HVF-000612]	☐
25	What they knew	Thirty-five were closed as yard moves.	[Ex. 17 · HVF-000612]	☐
26	What they knew	One of those yard moves ran 143 miles.	[Ex. 17 · HVF-000612]	☐

NO.	BEAT	STATEMENT	SOURCE	CHECKED
27	What they knew	Asked how many she assigned to a driver, Castellano answered: Two.	[Ex. 20 · Castellano Dep. 88:19]	☐
28	What they knew	Two log audits had matched unassigned trips to Pruitt by his fuel card.	[Ex. 16 · HVF-000540] [Ex. 16 · HVF-000540]	☐
29	What they knew	Between them a roadside inspector cited him for a false log.	[Ex. 16 · HVF-000540]	☐
30	What they knew	That same month the federal agency warned the carrier about hours of service.	[Ex. 8 · PUB-0002]	☐
31	What they knew	On these facts the court allowed a claim for punitive damages.	[Ex. 23 · Dkt. 61, page 4]	☐
32	The harm	The defendants' own orthopedic examiner found that the collision caused the fracture and that the fusion was necessary.	[Ex. 22 · DEF-IME-0015]	☐
33	The harm	He agrees she should not return to the marching field.	[Ex. 22 · DEF-IME-0015]	☐
34	The harm	The examiner calls a hardware revision possible, not probable.	[Ex. 22 · DEF-IME-0015]	☐
35	The harm	Her surgeon's one-year imaging already shows wear at the level below the fusion.	[Ex. 21 · ALD-MED-0498]	☐
36	The numbers	Medical bills stood at $386,870 when the demand was sent and have grown by $44,380 since.	[Ex. 10 · ALD-BILL-0002] [Ex. 21 · ALD-MED-0498]	☐
37	The numbers	The other figures are unchanged.	[Ex. 11 · ALD-LCP-0005] [Ex. 12 · ALD-EMP-0019] [Ex. 12 · ALD-EMP-0019]	☐
38	The numbers	The defense examiner puts future care at $212,000.	[Ex. 22 · DEF-IME-0015]	☐
39	The numbers	The policies total $6,000,000.	[Ex. 13 · INS-0002] [Ex. 13 · INS-0002]	☐
40	The numbers	Ms. Aldaco offered to settle for that sum before suit. Since then the court has allowed a punitive claim.	[Ex. 23 · Dkt. 61, page 4]	☐

NO.	BEAT	STATEMENT	SOURCE	CHECKED
41	The ask	The driver admits the practice.	[Ex. 18 · Pruitt Dep. 44:7]	☐
42	The ask	The dispatcher denied it and then identified his own message.	[Ex. 19 · Morrow Dep. 28:9] [Ex. 19 · Morrow Dep. 52:16]	☐
43	The ask	The safety director closed the trips as a yard move after she knew of the crash.	[Ex. 20 · Castellano Dep. 71:11] [Ex. 20 · Castellano Dep. 72:4]	☐
44	The ask	The defendants' examiner concedes causation.	[Ex. 22 · DEF-IME-0015]	☐

44 cited statements, 23 exhibits. Sign-off: _____ Date: _____

ATTACHED

The record

This sample attaches the cited pages. A client piece attaches each exhibit in full, behind the same chips, on a private link.

EX.	DOCUMENT	DATE	BATES RANGE	CITED
1	**Crash report no. 25-1009-0447**	October 9, 2025	FSP-0001 to FSP-0012	1×
2	**Electronic log data, unit 4417**	October 9, 2025, 11:12 p.m.	FSP-0013 to FSP-0041	1×
3	**Documents found in the cab**	October 10, 2025	FSP-0059 to FSP-0066	1×
4	**Toll transaction record**	October 14, 2025	FSP-0067 to FSP-0068	1×
5	**Messages between Pruitt and dispatch**	October 21, 2025	FSP-0069 to FSP-0088	3×
6	**Engine computer download, unit 4417**	October 13, 2025	FSP-0042 to FSP-0058	2×
7	**Collision reconstruction report**	November 3, 2025	FSP-0089 to FSP-0112	1×
8	**Public carrier record, Halden-Voss Freight Lines**	Retrieved January 12, 2026	PUB-0001 to PUB-0006	1×
9	**Calder Regional Trauma Center chart**	October 9 to 18, 2025	ALD-MED-0001 to ALD-MED-0412	1×

EX.	DOCUMENT	DATE	BATES RANGE	CITED
10	**Medical billing ledger**	Through February 20, 2026	ALD-BILL-0001 to ALD-BILL-0058	1×
11	**Life-care plan**	February 9, 2026	ALD-LCP-0001 to ALD-LCP-0044	1×
12	**Employment and earnings records**	February 2026	ALD-EMP-0001 to ALD-EMP-0031	2×
13	**Coverage disclosure**	December 3, 2025	INS-0001 to INS-0003	1×
14	**Edit history, unassigned driving, unit 4417**	October 9 to 10, 2025	HVF-000301 to HVF-000309	2×
15	**Dispatcher incentive plan**	Effective January 1, 2025	HVF-000410 to HVF-000412	2×
16	**Driver qualification file, Dale R. Pruitt**	2019 to 2025	HVF-000522 to HVF-000561	2×
17	**Unassigned driving report, all units**	July to September 2025	HVF-000611 to HVF-000618	3×
18	**Deposition of Dale R. Pruitt**	May 12, 2026	Pages 1 to 118	4×
19	**Deposition of Lyle Morrow, dispatcher**	May 20, 2026	Pages 1 to 96	4×
20	**Deposition of Renee Castellano, safety director**	June 3, 2026	Pages 1 to 131	4×

EX.	DOCUMENT	DATE	BATES RANGE	CITED
21	**Treating surgeon's one-year note**	October 14, 2026	ALD-MED-0496 to ALD-MED-0499	3×
22	**Defense medical examination**	August 6, 2026	DEF-IME-0001 to DEF-IME-0018	5×
23	**Order on motion to amend**	August 14, 2026	Docket entry 61	2×

EXHIBIT 1

Crash report no. 25-1009-0447

Franklin State Police crash report · October 9, 2025
Franklin State Police, by public records request
FSP-0001 to FSP-0012

EX. 1 · CRASH REPORT NO. 25-1009-0447 FSP-0003

Narrative

Time and place	Thursday, October 9, 2025, 9:47 p.m. Interstate 62 westbound at mile marker 114, Calder County.
Conditions	Clear, dry, dark. Marked work zone, left lane closed for bridge deck repair. Posted limit 55.
Unit 1	2022 tractor, Halden-Voss Freight Lines unit 4417, with 53-foot van trailer. Driver: Dale R. Pruitt.
Unit 2	Passenger car. Driver: Carmen L. Aldaco, returning to Calder from a school event in Harlan.

Unit 2 was stopped at the rear of a line of traffic waiting to merge right for the lane closure. Unit 1 approached in the right lane and struck Unit 2 from behind, pushing it into the vehicle ahead.

Driver of Unit 1 stated at the scene: "I never saw them stop. I must have zoned out for a second."

Citations to driver of Unit 1: failure to reduce speed to avoid a collision; false report of record of duty status, 49 C.F.R. § 395.8(e)(1).

INVENTED RECORD · COMPOSITE SAMPLE · FOURTEEN HOURS OUT, IN SUIT

EXHIBIT 2

Electronic log data, unit 4417

ELD data transfer taken at the post-crash inspection · October 9, 2025, 11:12 p.m.
Franklin State Police, commercial vehicle enforcement
FSP-0013 to FSP-0041

EX. 2 · ELECTRONIC LOG DATA, UNIT 4417 FSP-0016

Record of duty status. Driver: PRUITT, DALE R. October 8 to 9, 2025

TIME	STATUS	LOCATION
Oct 8, 9:38 p.m.	Off duty	Calder terminal
Oct 9, 8:50 a.m.	On duty (login)	Brannock Mills
8:55 a.m.	Driving	Brannock Mills
1:20 p.m.	Off duty	Rest area, mile 201
1:50 p.m.	Driving	Rest area, mile 201
3:10 p.m.	On duty	Dunmore
4:40 p.m.	Driving	Dunmore
5:15 p.m.	On duty	Harlan Yard
5:30 p.m.	Driving	Harlan Yard
9:47 p.m.	Hard-brake event	I-62 WB, mile 114

Totals for October 9 as logged: driving 10 h 37 min; on duty since 8:50 a.m.

INVENTED RECORD · COMPOSITE SAMPLE · FOURTEEN HOURS OUT, IN SUIT

EX. 2 · ELECTRONIC LOG DATA, UNIT 4417 FSP-0019

Unidentified driver profile, unit 4417, October 9, 2025

FROM	TO	MINUTES	MILES	START	END
3:52 a.m.	4:20 a.m.	28	27	Calder terminal	Three Forks
4:34 a.m.	6:10 a.m.	96	91	Three Forks	Brannock Mills
Total		124	118		

Status of both records at transfer: unassigned. No driver logged in.

INVENTED RECORD · COMPOSITE SAMPLE · FOURTEEN HOURS OUT, IN SUIT

EXHIBIT 3

Documents found in the cab

Inventory photographs · October 10, 2025
Franklin State Police, cab inventory
FSP-0059 to FSP-0066

EX. 3 · DOCUMENTS FOUND IN THE CAB FSP-0061

Fuel receipt

Seller	Three Forks Travel Center, pump 14
Date and time	October 9, 2025, 4:26 a.m.
Sale	Diesel no. 2, 87.4 gallons
Paid by	Fleet card ending 3391. Driver ID entered at pump: PRUITT D. Unit 4417.

INVENTED RECORD · COMPOSITE SAMPLE · FOURTEEN HOURS OUT, IN SUIT

EX. 3 · DOCUMENTS FOUND IN THE CAB FSP-0063

Bill of lading, Brannock Mills

Gate in	October 9, 2025, 6:10 a.m. Signed: D. Pruitt
Dock	Door 6. Appointment 6:00 a.m. (moved up from 10:00 a.m.)
Loaded out	8:55 a.m. 41,800 lb, paper rolls. Seal 0071934.

INVENTED RECORD · COMPOSITE SAMPLE · FOURTEEN HOURS OUT, IN SUIT

EXHIBIT 4

Toll transaction record

Franklin Turnpike Authority account record · October 14, 2025
Franklin State Police, by subpoena to the Authority
FSP-0067 to FSP-0068

EX. 4 · TOLL TRANSACTION RECORD FSP-0067

DATE	TIME	GANTRY	CLASS	ACCOUNT
Oct 9, 2025	5:03:41 a.m.	Kessler Bridge, eastbound	5 axle	Halden-Voss, unit 4417
Oct 9, 2025	2:02:17 p.m.	Dunmore spur, southbound	5 axle	Halden-Voss, unit 4417

INVENTED RECORD · COMPOSITE SAMPLE · FOURTEEN HOURS OUT, IN SUIT

EXHIBIT 5

Messages between Pruitt and dispatch

Phone extraction report · October 21, 2025
Franklin State Police, by search warrant for the driver's phone
FSP-0069 to FSP-0088

Thread: "Lyle Dispatch." October 9, 2025, morning

Lyle Dispatch · 3:38 a.m.
Mill moved your appt up to 6. Need you rolling now.

Pruitt · 3:40 a.m.
I only got off at 9:40 last night. Thats six hours not ten

Lyle Dispatch · 3:41 a.m.
Dont log in till youre at the mill. Well clean it up on our end.

Pruitt · 3:44 a.m.
ok rolling

Thread: "Lyle Dispatch." October 9, 2025, afternoon and evening

Lyle Dispatch · 4:52 p.m.
Reload at Harlan Yard. Has to be in Calder tonight.

Pruitt · 4:54 p.m.
Been up since 3:30. Im about out

Lyle Dispatch · 4:55 p.m.
Tablet shows you good till 10:50. Go.

Pruitt · 8:31 p.m.
eyes are heavy. might pull off at the 180

Lyle Dispatch · 8:33 p.m.
Youre two hours out. Push through and youre done.

EXHIBIT 6

Engine computer download, unit 4417

Engine control module report · October 13, 2025
Franklin State Police, reconstruction unit
FSP-0042 to FSP-0058

EX. 6 · ENGINE COMPUTER DOWNLOAD, UNIT 4417 FSP-0047

Last-stop record. One reading per second before impact

SECONDS	SPEED (MPH)	BRAKE	CRUISE
−10.0	66	Off	On, set 66
−5.0	66	Off	On
−2.0	66	Off	On
−1.0	66	Off	On
0.0	58	On	Off

The module stores one reading per second. Brake first shows as applied in the final reading.

INVENTED RECORD · COMPOSITE SAMPLE · FOURTEEN HOURS OUT, IN SUIT

EXHIBIT 7

Collision reconstruction report

Reconstruction unit report · November 3, 2025
Franklin State Police, reconstruction unit
FSP-0089 to FSP-0112

EX. 7 · COLLISION RECONSTRUCTION REPORT FSP-0096

Findings

Advance warning	Signs at 2 miles, 1 mile and 1,500 feet. Flashing arrow board at the taper. All in place and lit.
Sight distance	Road straight and level. Rear of the stopped line visible from 2,100 feet: 21.7 seconds at 66 mph.
Unit 2	State work-zone camera 114-B: stops at 9:46:19 p.m., hazard lights flashing; struck at 9:47:00. Its event data shows speed 0 and brake on for all 5 seconds recorded.
Unit 1	No braking until the final second before impact, and no evasive steering on the camera. Consistent with an inattentive or fatigued operator.

INVENTED RECORD · COMPOSITE SAMPLE · FOURTEEN HOURS OUT, IN SUIT

EXHIBIT 8

Public carrier record, Halden-Voss Freight Lines

Federal carrier safety data: public file and records request · Retrieved January 12, 2026
Federal Motor Carrier Safety Administration: public inspection data, and a Freedom of Information Act response
PUB-0001 to PUB-0006

Inspections and violations, 24 months ending October 2025

Fleet	212 power units, 240 drivers
Roadside inspections	318
Hours-of-service violations	61
Of those, false report of duty status	14
Agency action	Warning letter to the carrier, March 2025: hours-of-service compliance. Released under FOIA.

INVENTED RECORD · COMPOSITE SAMPLE · FOURTEEN HOURS OUT, IN SUIT

EXHIBIT 9

Calder Regional Trauma Center chart

Hospital records · October 9 to 18, 2025
Claimant's records, by authorization
ALD-MED-0001 to ALD-MED-0412

EX. 9 · CALDER REGIONAL TRAUMA CENTER CHART ALD-MED-0007

Trauma admission note

Arrival	October 9, 2025, 10:31 p.m., by ground ambulance. Restrained driver, rear impact by tractor-trailer.
Imaging	CT: L1 burst fracture with retropulsed bone occupying 40% of the canal. X-ray: displaced left distal radius fracture.
Neurologic	Concussion. GCS 14 on arrival. Leg strength intact.
Social history	Band director. Lives in Calder with husband and two sons, ages 14 and 11.
Past history	Lumbar muscle strain 2019, six chiropractic visits, resolved. No spine imaging before this admission.

INVENTED RECORD · COMPOSITE SAMPLE · FOURTEEN HOURS OUT, IN SUIT

EX. 9 · CALDER REGIONAL TRAUMA CENTER CHART ALD-MED-0033

Operative and discharge summary

DATE	EVENT
Oct 10	Posterior instrumented fusion, T12 to L2
Oct 12	Open reduction and plating, left distal radius
Oct 18	Discharged to inpatient rehabilitation after 9 days
Nov 6	Discharged home from rehabilitation after 19 days

INVENTED RECORD · COMPOSITE SAMPLE · FOURTEEN HOURS OUT, IN SUIT

EXHIBIT 10

Medical billing ledger

Provider bills, summarized · Through February 20, 2026

Claimant’s records

ALD-BILL-0001 to ALD-BILL-0058

EX. 10 · MEDICAL BILLING LEDGER ALD-BILL-0002

Charges by provider

PROVIDER	CHARGES
Calder Regional Trauma Center	$218,460
Surgeons and anesthesia	$64,120
Inpatient rehabilitation, 19 days	$71,300
Outpatient therapy, 62 visits	$18,910
Imaging, equipment and pharmacy	$9,880
Ambulance	$4,200
Total	$386,870

INVENTED RECORD · COMPOSITE SAMPLE · FOURTEEN HOURS OUT, IN SUIT

EXHIBIT 11

Life-care plan

Report of certified life-care planner · February 9, 2026
Claimant’s expert
ALD-LCP-0001 to ALD-LCP-0044

EX. 11 · LIFE-CARE PLAN ALD-LCP-0005

Summary of future care, present value

CATEGORY	PRESENT VALUE
Physician follow-up and imaging	$61,200
Physical therapy	$118,400
Pain management	$142,700
Hardware revision surgery (probable)	$96,500
Medication	$74,300
Equipment and home changes	$55,200
Total	$548,300

Permanent restrictions per treating surgeon: no lifting above 20 pounds; no standing longer than 20 minutes at a time.

INVENTED RECORD · COMPOSITE SAMPLE · FOURTEEN HOURS OUT, IN SUIT

EXHIBIT 12

Employment and earnings records

School district records and economist’s report · February 2026
Claimant’s records and expert
ALD-EMP-0001 to ALD-EMP-0031

EX. 12 · EMPLOYMENT AND EARNINGS RECORDS ALD-EMP-0002

Calder Valley School District, personnel summary

Position	Director of Bands, Calder Valley High School, since August 2008
Program	142 students enrolled, 2025 to 2026. Marching band: state finalist 2023 and 2024.
Leave	Medical leave October 10, 2025 to February 16, 2026. Returned February 17, 2026.
Assignment change	Marching band and summer band camp reassigned for 2026 on the surgeon’s restrictions.

INVENTED RECORD · COMPOSITE SAMPLE · FOURTEEN HOURS OUT, IN SUIT

EX. 12 · EMPLOYMENT AND EARNINGS RECORDS ALD-EMP-0019

Economist’s summary

Wages lost during leave	$31,640, after sick-leave pay
Future loss	Marching stipend and summer programs, $16,500 a year to age 65. Present value $264,000.

INVENTED RECORD · COMPOSITE SAMPLE · FOURTEEN HOURS OUT, IN SUIT

EXHIBIT 13

Coverage disclosure

Letter from the carrier’s insurer · December 3, 2025
Received in response to counsel’s letter of November 14, 2025
INS-0001 to INS-0003

EX. 13 · COVERAGE DISCLOSURE INS-0002

Policies in force on October 9, 2025

Primary auto liability	$1,000,000 combined single limit
Excess liability	$5,000,000 each occurrence

INVENTED RECORD · COMPOSITE SAMPLE · FOURTEEN HOURS OUT, IN SUIT

EXHIBIT 14

Edit history, unassigned driving, unit 4417

Electronic log back-office audit trail · October 9 to 10, 2025
Produced by Halden-Voss, request for production 14
HVF-000301 to HVF-000309

EX. 14 · EDIT HISTORY, UNASSIGNED DRIVING, UNIT 4417 HVF-000304

Unidentified driving events, unit 4417, October 9, 2025

WHEN	USER	ACTION
Oct 9, 6:22 a.m.	System	Alert to safety inbox: 2 unassigned events, 118 miles
Oct 9, 9:47 p.m.	System	Hard-brake event, unit 4417
Oct 10, 8:14 a.m.	R. Castellano	Annotated both events: “Yard move / shop road test. No driver assignment.”
Oct 10, 8:15 a.m.	R. Castellano	Events closed

INVENTED RECORD · COMPOSITE SAMPLE · FOURTEEN HOURS OUT, IN SUIT

EXHIBIT 15

Dispatcher incentive plan

Internal memorandum · Effective January 1, 2025
Produced by Halden-Voss, request for production 22
HVF-000410 to HVF-000412

EX. 15 · DISPATCHER INCENTIVE PLAN HVF-000411

Monthly on-time bonus, dispatch

On-time load	$40 to the dispatcher
Late load	Minus $60
Service failure, key account	Loss of the month’s bonus
Hours-of-service holds	Not an excused delay unless the terminal manager approves in advance

INVENTED RECORD · COMPOSITE SAMPLE · FOURTEEN HOURS OUT, IN SUIT

EXHIBIT 16

Driver qualification file, Dale R. Pruitt

Personnel and safety file · 2019 to 2025
Produced by Halden-Voss, request for production 6
HVF-000522 to HVF-000561

EX. 16 · DRIVER QUALIFICATION FILE, DALE R. PRUITT HVF-000540

Log audit and discipline history

DATE	FINDING	ACTION
Nov 2024	Log audit: 3 unassigned trips matched to Pruitt by fuel card	Verbal coaching
Mar 2025	Roadside inspection: cited for false report of duty status	Written warning
Jun 2025	Log audit: 4 unassigned trips matched to Pruitt by fuel card	None recorded

INVENTED RECORD · COMPOSITE SAMPLE · FOURTEEN HOURS OUT, IN SUIT

EXHIBIT 17

Unassigned driving report, all units

Electronic log back-office report · July to September 2025
Produced by Halden-Voss, request for production 15
HVF-000611 to HVF-000618

EX. 17 · UNASSIGNED DRIVING REPORT, ALL UNITS HVF-000612

Unassigned trips longer than 20 miles, third quarter 2025

Trips	37
Closed as “yard move”	35
Assigned to a driver	2
Longest trip closed as a yard move	143 miles

INVENTED RECORD · COMPOSITE SAMPLE · FOURTEEN HOURS OUT, IN SUIT

EXHIBIT 18

Deposition of Dale R. Pruitt

Deposition transcript · May 12, 2026
Taken by plaintiff
Pages 1 to 118

EX. 18 · DEPOSITION OF DALE R. PRUITT — PRUITT DEP. 44 TO 61

44:7 **Q.** Who told you not to log in before the mill?
A. Lyle. That's how we did the early appointments.

45:2 **Q.** Had you done it before October 9?
A. A dozen times that year. Maybe more.

61:14 **Q.** What do you remember of the last mile?
A. I don't. I remember the sign for exit 120, and then the airbag.

INVENTED RECORD · COMPOSITE SAMPLE · FOURTEEN HOURS OUT, IN SUIT

EXHIBIT 19

Deposition of Lyle Morrow, dispatcher

Deposition transcript · May 20, 2026
Taken by plaintiff
Pages 1 to 96

EX. 19 · DEPOSITION OF LYLE MORROW, DISPATCHER — MORROW DEP. 28 TO 53

28:9 **Q.** Did you ever tell a driver to drive without logging in?
A. No. Never.

29:3 **Q.** Did you know Mr. Pruitt was out of hours that afternoon?
A. The system showed him legal. That's all I go by.

52:16 **Q.** I'm showing you FSP-0074. Is that your message?
A. That's my number.

53:1 **Q.** What does "we'll clean it up on our end" mean?
A. Safety takes care of the unassigned time.

INVENTED RECORD · COMPOSITE SAMPLE · FOURTEEN HOURS OUT, IN SUIT

EXHIBIT 20

Deposition of Renee Castellano, safety director

Deposition transcript · June 3, 2026
Taken by plaintiff
Pages 1 to 131

EX. 20 · DEPOSITION OF RENEE CASTELLANO, SAFETY DIRECTOR — CASTELLANO DEP. 33 TO 88

33:5 **Q.** How does Halden-Voss handle unassigned driving?
A. Every event is investigated and assigned to the right driver.

71:11 **Q.** This entry says yard move. The truck went 118 miles. Did you investigate?
A. I closed what was in the queue that morning.

72:4 **Q.** Did you know about the crash when you closed them?
A. I had the call around eleven the night before.

88:19 **Q.** Of the 37 trips in that quarter, how many did you assign to a driver?
A. Two.

INVENTED RECORD · COMPOSITE SAMPLE · FOURTEEN HOURS OUT, IN SUIT

EXHIBIT 21

Treating surgeon’s one-year note

Clinic note · October 14, 2026
Plaintiff’s records, supplemental production
ALD-MED-0496 to ALD-MED-0499

EX. 21 · TREATING SURGEON’S ONE-YEAR NOTE — ALD-MED-0498

Imaging	Fusion solid T12 to L2. Early degenerative change at L2-L3, the level below the fusion.
Function	Daily pain, worse with standing. Restrictions permanent: 20 pounds; no standing beyond 20 minutes.
Bills	Charges since February 20, 2026: $44,380 (therapy, injections, imaging).

INVENTED RECORD · COMPOSITE SAMPLE · FOURTEEN HOURS OUT, IN SUIT

EXHIBIT 22

Defense medical examination

Report of defendants' orthopedic examiner · August 6, 2026
Served by defendants
DEF-IME-0001 to DEF-IME-0018

EX. 22 · DEFENSE MEDICAL EXAMINATION DEF-IME-0015

Opinions

Causation	The L1 fracture and the fusion were caused by the collision. The surgery was necessary.
Work	Can teach full time in a classroom. Marching-field work is not advised.
Future surgery	Hardware revision is possible, not probable.
Future care, examiner's estimate	$212,000 present value

INVENTED RECORD · COMPOSITE SAMPLE · FOURTEEN HOURS OUT, IN SUIT

EXHIBIT 23

Order on motion to amend

Court order · August 14, 2026
Circuit Court for Calder County
Docket entry 61

EX. 23 · ORDER ON MOTION TO AMEND DKT. 61, PAGE 4

Plaintiff has made a prima facie showing that the carrier knew its driver was operating outside the hours-of-service rules and directed him to continue. Leave to add a claim for punitive damages is GRANTED.

INVENTED RECORD · COMPOSITE SAMPLE · FOURTEEN HOURS OUT, IN SUIT