

EXHIBIT D
DEPOSITION OF R. ANDERSON

1 Q. Okay. But you said you could have crossed
2 anywhere, just not at the --

3 A. Before it was dammed up everything was grown
4 up, and that's the only way you crossed it.

5 Q. Okay.

6 A. After it was dammed up it was cleaned up, and
7 you could go wherever you wanted to.

8 Q. So before the river was dammed up, you say all
9 of the vegetation --

10 A. Yes, sir.

11 Q. -- on the river side of the tracks was grown
12 up?

13 A. Yeah.

14 Q. So the only way to get down to that area was
15 through the road that led down there?

16 A. Yes, sir.

17 Q. Okay.

18 A. Now, there were other trails to get to the
19 river. You could have gone probably 75 yards up on
20 the tracks and found a trail to get to the river.

21 Q. Okay.

22 A. So that wasn't the only place you could get to
23 the river. I don't want to leave that out there.

24 Q. Okay. So you would have crossed at this Oliver
25 Street and possibly other areas?