

1 you have a recollection of specifically inspecting tree  
2 No. 2?

3 A. Yes.

4 Q. Okay. And what, if anything, do you have a  
5 recollection of noting about tree No. 2?

6 A. Same as all of the other old trees in the camp.

7 Q. Namely, what --

8 A. Old age, decline resulting from old age,  
9 decline resulting from camp activities --

10 Q. Are you talking about the --

11 A. Just generally all of the old trees in downtown  
12 were in poor condition because of old age and the  
13 activities of the camp.

14 Q. And you say the activities of the camp, are you  
15 talking about the foot traffic around the root system?

16 A. Foot traffic, removal of the native leaf  
17 mulch --

18 Q. Anything else? Go ahead.

19 A. Just generally changing the neighborhood from a  
20 forest to a camp.

21 Q. Understood.

22 A. Taking it out of a natural forest setting.

23 Q. Do you recall, sir, the fact that this tree,  
24 tree No. 2, arched out over and above a set of power  
25 lines?