

**AFFIDAVIT**

**SWORN AFFIDAVIT OF** [REDACTED]

County of Irwin  
State of Georgia

Personally appeared before the undersigned attesting officer, duly authorized to administer oaths, [REDACTED], who testified as follows:

1.

I am over eighteen years old and am of sound mind. Under power of oath, I swear and affirm that following is true and correct.

2.

Butler Heck.

I am voluntarily giving this affidavit to the Butler Law Firm, whom I understand represents [REDACTED]'s sons in their case against [REDACTED]. I have had plenty of time to review all of the below-appearing statements. I have reviewed them, and they are true and correct.

(3)

I did not see the collision between the peanut wagon + ~~tractor~~ pickup truck

(4)

I was driving the tractor that is circled on Px 4 at the time of the collision.

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(5)

I have reviewed the transcripts of my 911 calls labeled Track 2 (Px 40) and Track 12 (Px 41) and those transcripts are correct & accurate.

(6)

When I first got to him, Mr. [REDACTED] [REDACTED] was breathing & conscious.

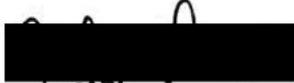
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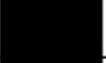
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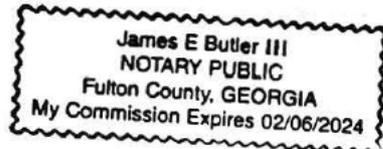
Including this statement, there are 7 numbered statements and 3 attachments to this affidavit.

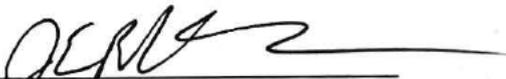
This 19 day of March, 2023.

  
\_\_\_\_\_

I, James E. Butler III, notary public for the county and state, certify that  , whose name is signed to the foregoing instrument and who is known to me, acknowledged before me on this day that, being informed of the contents of the instruments, he executed the same voluntarily.

Sworn to and subscribed before me  
this 19 day of March, 2023.



  
\_\_\_\_\_  
Notary Public



PLAINTIFF'S  
EXHIBIT  
Px 4  
IMG\_0758

270  
COLDWY  
PEANUT

FX4  
OFF ROAD

278  
COLDWY  
PEANUT

270  
COLDWY  
PEANUT

## Track 2

- [phone ringing, heavy breathing]
- Irwin County 911, can I help you?
- **Yes, I need an ambulance at, uh, [inaudible] Road.**
- Where?
- **On Ten Mile Road.**
- Ten more? What's going on?
- **Uh, ten mile.**
- Ma'am?
- **Someone's been pinned between a peanut wagon and a pickup truck.**
- You hit somebody on Ten more between – pinned?
- **Ten Mile.**
- At Ten Mile?
- **Ten Mile Road. Yeah, um.**
- Do you know who it is?
- **If you come from Land's Crossing...**
- Ma'am? Hello?
- **If you come from Land's Crossing, turn right**
- If you come from Land's Crossing, turn to the right?
- **Yeah, turn to the right.**
- You said somebody's pinned between a peanut wagon and what?
- **A pickup truck.**
- A pickup truck and a peanut wagon. But is it on the, is it in the field?
- **Yes.**
- Ok, it's in the field. Your name real quick?
- **Shane Land.**
- Can I get your phone number? She's got them en route.
- **Yeah, it's [inaudible]**
- Is he conscious or bleeding, or?
- **Right now he is, right now.**
- He's still conscious, is he sitting bleeding or you just tell he's?
- **Not right now.**
- Ok, um,
- **Come to Land's Crossing, turn right**
- Turn right at land's crossing, ok. In peanut field. Ok, she's got [EMS en route].

## Track 12

- [phone ringing]
- Irwin County 911
- **Hey**
- Yes
- **Hey, is this [REDACTED]?**
- No, this is [REDACTED].
- **Ok, [REDACTED], I'm sorry [...] this is [REDACTED], I just called about the guy that's been crushed.**
- Yeah
- **Um, do you have an ETA on them?**
- They're [...] just as quick as I can get them there. Is he conscious? Is he breathing? Tell me what's going on.
- **I think, I think he quit breathing.** I'm out here by the road waiting [...]
- [...]