

In The Matter Of:
Walden vs. Chrysler

Judson Estes
December 10, 2014

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SUPERIOR COURT OF DECATUR COUNTY

STATE OF GEORGIA

JAMES BRYAN WALDEN and LINDSAY
WALDEN, Individually and on Behalf of
the Estate of Their Deceased Son,
REMINGTON COLE WALDEN,

Plaintiffs,

vs.

Case No. 12-CV-472

CHRYSLER GROUP, L.L.C., and
BRYAN L. HARRELL,

Defendants.

The Videotaped Deposition of JUDSON ESTES,
Taken at 2501 Worldgateway Place,
Romulus, Michigan,
Commencing at 9:07 a.m.,
Wednesday, December 10, 2014,
Before Leisa M. Pastor, CSR-3500, RPR, CRR.

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24
25

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1 Romulus, Michigan

2 Wednesday, December 10, 2014

3 9:07 a.m.

4

5 (All references to Mr. Butler in this
6 transcript are to Mr. James Butler, Jr.,
7 unless otherwise specified.)

8 MR. BUTLER: This is the videotaped
9 deposition of Mr. Judson Estes taken for use at trial
10 and cross-examination and for all lawful purposes
11 under the Georgia Civil Practice Act. We're here in
12 Detroit, Michigan. Would you -- Mr. Brantley is on
13 the speakerphone listening in, says he's not going to
14 participate. Counsel for Chrysler Group, next time
15 you all have somebody on speakerphone, please give me
16 advance notice and let me know if they're going to be
17 speaking because it's very disruptive.

18 Any other things on the steno before we get
19 started, Ms. Jeffrey?

20 MS. JEFFREY: No.

21 MR. BUTLER: Let's crank it up.

22 VIDEO TECHNICIAN: Stand by, please. We
23 are now on the record. The time is 9:08 a.m. This is
24 the beginning of tape 1 of the videotaped deposition
25 of Mr. Judson Estes in the matter of Walden, et al.,

1 versus Chrysler Group, et al.

2 Today's date is Wednesday, December 10th,
3 2014. My name is Bill Hunt, the legal video
4 specialist. Would counsel please identify themselves
5 and whom they represent for the record?

6 MR. BUTLER: Jim Butler, Jeb Butler, and
7 paralegal Beth Glen here for the plaintiffs.

8 MS. JEFFREY: Sheila Jeffrey from Miller
9 Canfield, Alan DeGraw, in-house counsel for Chrysler
10 Group, and for the witness Judson Estes and for
11 Chrysler.

12 VIDEO TECHNICIAN: Would the court reporter
13 please swear in the witness?

14 JUDSON ESTES,
15 was thereupon called as a witness herein, and after
16 having first been duly sworn to testify to the truth,
17 the whole truth and nothing but the truth, was
18 examined and testified as follows:

19 MR. BUTLER: Let the record reflect Mr.
20 Brantley is attending by telephone.

21 EXAMINATION

22 BY MR. BUTLER:

23 Q. State your name for the record, please, sir.

24 **A. Judson Estes.**

25 Q. Where do you live?

- 1 **A. 4740 Kensington Road, Milford, Michigan.**
- 2 Q. How close is Milford to Auburn Hills?
- 3 **A. 32 miles.**
- 4 Q. Do you still work at Chrysler?
- 5 **A. Yes.**
- 6 Q. When did you start at Chrysler?
- 7 **A. May 19th, 1986.**
- 8 Q. So you've been there 29 years?
- 9 **A. Almost.**
- 10 Q. Are you still at the Auburn Hills technical center?
- 11 **A. Yes.**
- 12 Q. How long has your office been there?
- 13 **A. I have to do a little math.**
- 14 Q. Roughly?
- 15 **A. 17 years.**
- 16 Q. Is Chrysler's headquarters there, as well?
- 17 **A. Yes.**
- 18 Q. Is Mr. Marchionne's U.S. office there in Auburn Hills?
- 19 **A. I don't know.**
- 20 Q. Have you met with counsel for Chrysler before this
21 deposition?
- 22 **A. Yes.**
- 23 Q. Who did you meet with?
- 24 **A. Ms. Jeffries, Mr. Vandro (phonetic).**
- 25 Q. Anybody else?

- 1 **A. Whoever's on the phone, name --**
- 2 Q. Mr. Brantley?
- 3 **A. Yes.**
- 4 Q. Where did you all meet?
- 5 **A. Chrysler's headquarters.**
- 6 Q. Auburn Hills, Michigan?
- 7 **A. Auburn Hills, Michigan.**
- 8 Q. When was that?
- 9 **A. Monday.**
- 10 Q. How long?
- 11 **A. I think it was an hour and a half.**
- 12 Q. Is that the only meeting you've had with Chrysler's
- 13 lawyers before this deposition?
- 14 **A. On this topic, yes.**
- 15 Q. What do you mean, on this topic?
- 16 **A. I've met with lawyers previously.**
- 17 Q. But on the topic of this deposition that's the only
- 18 one?
- 19 **A. That's the only one.**
- 20 Q. Was Mr. Brantley here in Michigan for that meeting?
- 21 **A. No.**
- 22 Q. In 1986 Chrysler was called Chrysler Corporation; is
- 23 that right?
- 24 **A. I believe so.**
- 25 Q. And then at some point Daimler got an interest in

1 Chrysler and it became known as DaimlerChrysler?

2 **A. Yes.**

3 Q. Do you know when -- do you remember when that was
4 about?

5 **A. I believe 1998 but I'm not sure.**

6 Q. And when did Daimler give up its interest in Chrysler;
7 do you remember?

8 **A. Sometime in 2007.**

9 Q. That's when Cerberus Capital Management or something
10 like that bought Daimler's interest; is that right?

11 **A. I believe that's what happened.**

12 Q. And Fiat acquired an interest -- its interest in 2009?

13 **A. That's a muddled picture, I don't understand what
14 happened.**

15 Q. Okay. But you work for Chrysler Corporation?

16 **A. Yes.**

17 Q. You worked for DaimlerChrysler?

18 **A. Yes.**

19 Q. Then you worked for Chrysler Group?

20 **A. Yes.**

21 Q. And now you work for Fiat Chrysler?

22 MS. JEFFREY: Object to form.

23 **A. I don't think I work for Fiat Chrysler yet.**

24 BY MR. BUTLER:

25 Q. All right.

1 **A. I don't believe that's consummated, as it was.**

2 Q. The new entity is going to be called Fiat Chrysler
3 Automobiles -- gosh, it's a Netherlands corporation,
4 isn't it?

5 **A. I don't know --**

6 MS. JEFFREY: Object --

7 **A. -- what it's called.**

8 BY MR. BUTLER:

9 Q. Okay. Well, I want to ask you, in your conversations
10 with Chrysler counsel did you talk about any
11 documents?

12 **A. Yes.**

13 Q. Did you talk about documents that were generated back
14 when you worked for Chrysler Corporation?

15 **A. Yes.**

16 Q. Did you talk about documents that were generated back
17 when you worked for DaimlerChrysler?

18 **A. No.**

19 Q. Did you discuss the actions that were undertaken by
20 the automaker known as Chrysler back when it was
21 called Chrysler Corporation?

22 **A. Yes.**

23 Q. And the actions undertaken by the automaker back when
24 it was called DaimlerChrysler?

25 **A. No.**

1 Q. Okay. Tell us what Chrysler's lawyers told you about
2 anything that preceded 2009?

3 MS. JEFFREY: I'm going to object and
4 direct him not to answer questions regarding our
5 discussions.

6 MR. BUTLER: And why is that?

7 MS. JEFFREY: Attorney-client privilege.

8 MR. BUTLER: Off the video just a minute.

9 VIDEO TECHNICIAN: All right. 9:13, we are
10 off the record.

11 (Off the record at 9:13 a.m.)

12 (Back on the record at 9:14 a.m.)

13 VIDEO TECHNICIAN: 9:14, we are back on the
14 record.

15 BY MR. BUTLER:

16 Q. Did you have any discussions with Chrysler counsel
17 about any claims that the entity known as, quote,
18 Chrysler Group, L.L.C., close quote, is not
19 responsible for the 1999 Grand Cherokee?

20 MS. JEFFREY: I'm going to direct him not
21 to answer any questions about our discussions, they're
22 privileged.

23 MR. BUTLER: Well, that's a specific
24 question, Ms. Jeffrey, are you directing him not to
25 answer the question?

1 MS. JEFFREY: Yes, I am.

2 MR. BUTLER: Then you need to state the
3 grounds.

4 MS. JEFFREY: Because you're seeking
5 attorney-client privileged communications.

6 BY MR. BUTLER:

7 Q. Mr. Estes, are you going to abide by Ms. Jeffrey's
8 instruction you're not to answer that question?

9 **A. I will.**

10 MR. BUTLER: May we have a stipulation, Ms.
11 Jeffrey, that if you instruct him not to answer he's
12 going to follow your instruction and so I don't have
13 to ask that repeat question?

14 MS. JEFFREY: That's fine.

15 BY MR. BUTLER:

16 Q. Mr. Estes, will you so stipulate?

17 **A. Sure.**

18 Q. Thank you. I understand that you're going to Italy
19 sometime in January?

20 **A. I hope so.**

21 Q. Well, have you been assigned to a job in Italy?

22 **A. Yes.**

23 Q. Where will you be working in Italy?

24 **A. Three various plants.**

25 Q. Where are they?

1 **A. Turin, Modena and Cassino.**

2 Q. What do they make there?

3 **A. Cars.**

4 Q. What kind of cars?

5 **A. Alfa Romeo and Maserati cars.**

6 Q. When did you get that assignment?

7 **A. Last year.**

8 Q. 2013?

9 **A. 2014 was the year.**

10 Q. What month?

11 **A. Difficult to say.**

12 Q. When do you expect to move?

13 **A. It would seem a reasonable question, but I can't**
14 **answer that because I don't have an expectation. I'm**
15 **waiting on the Italian government bureaucracy to issue**
16 **a form.**

17 Q. Do you have a place to live already over there?

18 **A. No.**

19 MS. JEFFREY: Were you done with your
20 answer?

21 **A. No -- well, I do not have a place to live.**

22 BY MR. BUTLER:

23 Q. Will you be working for -- well, strike that.

24 What corporation will you be working for?

25 **A. I think it was determined I'll be working for Fiat**

1 **International --**

2 Q. All right.

3 **A. -- a subsidiary designed to hold the expatriates.**

4 Q. Do you know what you'll be doing?

5 **A. I'll have the same job I have now.**

6 Q. What's that?

7 **A. Teaching and training problem solving.**

8 Q. How long have you had that job at Chrysler?

9 **A. 16 years.**

10 Q. You worked in impact analysis and impact testing in
11 one job or another, as I understand it, from about
12 1986 through 1998, correct?

13 **A. Yes.**

14 Q. In 1998 did you move away from crash testing and into
15 some other job?

16 **A. Yes.**

17 Q. What was the job you moved to?

18 **A. I worked in the Toledo assembly factory.**

19 Q. All right. The beginning of your work managing the
20 crash test program for the -- strike that.

21 You began working on Grand Cherokees when
22 you started managing the crash test program for the
23 1996 and 1997 Grand Cherokees; is that correct?

24 **A. Which Grand Cherokees? It's a generic name, please**
25 **specify the name.**

1 Q. I'm going to go by model years, '96 to '97, did you
2 work with crash testing for those vehicles?

3 **A. '96 and '97 Grand Cherokees? Yes.**

4 Q. Yes, sir. Did you work on crash testing for the '98
5 Grand Cherokees?

6 **A. Yes.**

7 Q. Did you work on crash testing for the '99 Grand
8 Cherokees?

9 **A. I did a little bit.**

10 Q. All right. How many times have you given a
11 deposition?

12 **A. Three.**

13 Q. One of those was in the case of Austin vs. Chrysler, a
14 New York case; is that correct?

15 **A. I do not recall.**

16 Q. What have you reviewed in terms of documents to
17 prepare for this deposition?

18 **A. I reviewed a testimony from a previous case.**

19 Q. What case was that?

20 **A. I don't honestly recall the case, I didn't read the
21 title, I read my testimony in it.**

22 Q. Anything else?

23 **A. I received copies of a letter to Sergio Marchionne
24 that I also read.**

25 Q. A letter from whom?

1 **A. I believe it was from a fellow named Sheridan.**

2 Q. Anything else?

3 **A. No.**

4 Q. Have you reviewed anything about this wreck that Remy
5 Walden was killed?

6 **A. No, not that I recall.**

7 Q. Do you understand that this wreck involved a 1999
8 Grand Cherokee with a rear gas tank?

9 MS. JEFFREY: Object to form.

10 You can answer when I object to form.

11 **A. I think it -- yes, I know it was a 1999 Grand
12 Cherokee.**

13 BY MR. BUTLER:

14 Q. Will you agree that all Jeep Grand Cherokees from
15 model year 1993 through model year 2004 had rear gas
16 tanks?

17 MS. JEFFREY: Object to form.

18 **A. I am only knowledgeable about '96, '97, '98 and '99
19 Grand Cherokees. Previous to that, it's passing
20 knowledge.**

21 BY MR. BUTLER:

22 Q. Do you understand that all Jeep Grand Cherokees from
23 model year 1993 through model year 2004 had rear gas
24 tanks?

25 MS. JEFFREY: Object to the form.

1 **A. Understand, I don't -- it's an open term, I don't know**
2 **if they did or not.**

3 BY MR. BUTLER:

4 Q. Do you know that in -- for the model year 2005,
5 Chrysler moved the gas tank on the Grand Cherokee away
6 from the rear and put it in the midships location?

7 **A. No, I was unaware of any change in geometry for the**
8 **car, how it was packaged.**

9 Q. You haven't discussed that with anybody?

10 **A. No.**

11 Q. Were you aware that not all Jeeps had rear gas tanks?

12 **A. Yes.**

13 Q. The Grand Wagoneer, for example, had a gas tank in the
14 midships location, correct?

15 **A. I don't know.**

16 Q. Will you agree that Chrysler sold Grand Cherokees,
17 Cherokees and Jeep Liberties, all of which had gas
18 tanks located in the same place at the rear of the
19 vehicle?

20 MS. JEFFREY: Object to form.

21 **A. Those three vehicles had gas tanks at the rear of the**
22 **vehicle.**

23 MARKED FOR IDENTIFICATION:

24 DEPOSITION EXHIBIT 1

25 9:22 a.m.

1 BY MR. BUTLER:

2 Q. I'd like to show you Plaintiffs' Exhibit Number 1 and
3 ask if you recognize this as a photograph of the gas
4 tank from 1999 Grand Cherokee that's been wrapped in
5 red?

6 **A. From my opinion, there are no distinctive marks in
7 this photograph that allow me to identify it
8 distinctly as a Grand Cherokee.**

9 Q. Does it look like a Grand Cherokee to you?

10 **A. It looks like any car from behind.**

11 MARKED FOR IDENTIFICATION:

12 DEPOSITION EXHIBIT 2

13 9:23 a.m.

14 BY MR. BUTLER:

15 Q. I'll show you Plaintiffs' Exhibit Number 2. Maybe
16 this will help you a little bit. Do you recognize
17 that as another picture of the same 1999 Grand
18 Cherokee showing the gas tank wrapped in red?

19 **A. This vehicle's picture has no identifying marks, it
20 has no identifying color. I cannot say that this is a
21 Grand Cherokee.**

22 Q. In your work with crash tests on Grand Cherokees, did
23 you ever take off the face bar?

24 **A. Which Grand Cherokee?**

25 Q. Any Grand Cherokees.

1 **A. I don't understand the term face bar. It's not a term**
2 **I ever use. Please illuminate.**

3 Q. You haven't heard that term?

4 **A. Face bar?**

5 Q. Face bar.

6 **A. (Witness shakes head.)**

7 Q. You were not aware that what looks like a bumper on
8 the Grand Cherokees was called by Chrysler a, quote,
9 face bar, close quote?

10 MS. JEFFREY: Object to form.

11 **A. I don't use that term. I have not heard that term at**
12 **Chrysler before. The term face bar is not familiar to**
13 **me.**

14 BY MR. BUTLER:

15 Q. Have you heard that term before?

16 **A. Not until you spoke it.**

17 Q. Did you ever -- in your work in crash testing of Grand
18 Cherokees, did you ever take off the thing that looks
19 like a bumper?

20 **A. There is a fascia, a plastic fascia.**

21 Q. What does the word fascia --

22 **A. That would --**

23 Q. What does the word fascia mean?

24 **A. It's a plastic covering over the structure.**

25 Q. I understand.

1 **A. A trim piece.**

2 Q. Yeah, and it looks like a bumper, right?

3 **A. Yes.**

4 Q. But it's not really a bumper, is it?

5 **A. It's a trim piece.**

6 Q. It's a trim piece, it's a plastic trim piece, it's not
7 really a bumper, is it?

8 **A. No.**

9 Q. It just looks like a bumper?

10 **A. It's a trim piece to cover up the steel structure.**

11 Q. It doesn't cover up steel, does it, sir?

12 **A. Yes, it does.**

13 Q. Doesn't it cover up Styrofoam?

14 **A. That's the first layer.**

15 Q. What does the word fascia, f-a-s-c-i-a, mean?

16 **A. In terms of Chrysler engineering, it is the skinned
17 plastic external covering for trim and looks on the
18 outside of a car.**

19 MARKED FOR IDENTIFICATION:

20 DEPOSITION EXHIBITS 3-4

21 9:25 a.m.

22 BY MR. BUTLER:

23 Q. I show you Plaintiffs' Exhibit Number 3. Do you
24 recognize this as a photograph of a Grand Cherokee
25 with that plastic fascia removed?

1 **A. Yes, this is a Grand Cherokee.**

2 Q. Is the fuel tank properly labeled?

3 **A. Yes.**

4 Q. Is the brush guard properly labeled?

5 **A. Yes.**

6 Q. Is the spare tire location properly labeled?

7 **A. Yes.**

8 Q. Is the Styrofoam insert, which you just testified is
9 behind the trim piece, properly labeled?

10 **A. Yes.**

11 Q. The gas tank is located under the spare tire location,
12 correct?

13 **A. Yes.**

14 Q. And under the gas tank is what Chrysler calls a,
15 quote, brush guard, close quote, correct?

16 **A. Yes.**

17 Q. The tank sits in the brush guard like the brush guard
18 was a bucket or a bowl, correct?

19 **A. Yes, it can be characterized that way.**

20 Q. The brush guard is made of steel, correct?

21 **A. Steel, yes, it's made of steel.**

22 Q. It's one millimeter thick, correct?

23 **A. I could not say exactly what the thickness is, I
24 didn't design it or release it. I believe it's
25 thicker than that actually.**

1 MR. BUTLER: Go off the video just a
2 minute.

3 VIDEO TECHNICIAN: 9:26, we are off the
4 record.

5 (Off the record at 9:26 a.m.)

6 (Back on the record at 9:28 a.m.)

7 VIDEO TECHNICIAN: 9:28, we are back on the
8 record.

9 BY MR. BUTLER:

10 Q. Mr. Estes, you know, I was trying to figure out where
11 I got the one millimeter. Have you read the
12 deposition of Chrysler's expert in this case, Mr.
13 Olson?

14 **A. No.**

15 Q. Have you talked to anybody about that?

16 **A. No.**

17 Q. Were you aware that Mr. Olson testified under oath on
18 page 99, line 19 of his deposition in this case,
19 quote, the brush guard is one millimeter thick, close
20 quote?

21 **A. No.**

22 Q. Is Mr. Olson wrong?

23 **A. I don't know.**

24 MARKED FOR IDENTIFICATION:

25 DEPOSITION EXHIBIT 12-A

1 9:30 a.m.

2 BY MR. BUTLER:

3 Q. Well, let me show you what's been marked as
4 Plaintiffs' Exhibit Number 12-A.

5 MS. JEFFREY: I'm sorry, 12 what?

6 MR. BUTLER: A, as in apple.

7 MS. JEFFREY: Okay.

8 BY MR. BUTLER:

9 Q. You recognize this as a Chrysler document; do you not?
10 Mr. Estes, doesn't it say right there Chrysler
11 Corporation at the top of the first page?

12 **A. Yes.**

13 Q. Do you recognize this as a Chrysler document?

14 **A. It does say Chrysler on it.**

15 Q. Is it a Chrysler document?

16 **A. I don't know.**

17 Q. Do you see in the bottom right corner, it's hard to
18 read, it's so small, it's got a Bates number on it?
19 Do you see that? And you can see it on the subsequent
20 pages, it's got a Bates number at the bottom. You
21 know what a Bates number is, don't you?

22 **A. Nope.**

23 Q. Well, I'll just ask you to assume it's a Chrysler
24 document in the interest of time. Turn to page 2.
25 This whole document is about the brush guard; is it

1 not?

2 **A. It appears to be.**

3 Q. Page 2 talks about the brush guard assembly, correct?

4 **A. Yes.**

5 Q. Page 3, item number 1 under general engineering notes
6 says, quote, material, galvanized steel for item
7 number 1, 1.00 thick; is that correct?

8 **A. Yes, it does say that.**

9 Q. All right. Now, I want to show -- I want you to show
10 the jury how thick one millimeter is. Now, I've got
11 as Plaintiffs' Exhibit 14-B here a ruler that has
12 millimeters. How thick is one millimeter?

13 MS. JEFFREY: I object to form and I don't
14 think it's proper for you to be asking him to
15 demonstrate this, but I'll let him go ahead and do it.

16 Can you tell from that?

17 **A. One millimeter of steel is one-tenth of a centimeter,**
18 **which would be this thick.**

19 MARKED FOR IDENTIFICATION:

20 DEPOSITION EXHIBITS 14-A & 14-B

21 9:33 a.m.

22 BY MR. BUTLER:

23 Q. It's about the same thickness as Plaintiffs' Exhibit
24 14-A, which is two of my business cards stapled
25 together; is it not?

1 MS. JEFFREY: Object to form.

2 **A. Your business cards appear a bit thin.**

3 BY MR. BUTLER:

4 Q. Do you --

5 **A. Similar, though.**

6 Q. Do I need to put three business cards together to make
7 it --

8 **A. I think so.**

9 Q. -- one millimeter?

10 All right. Anybody got a business card we
11 can staple? We'll do that and come back to it.

12 Back to Plaintiffs' Exhibit Number 3, which
13 is the 1999 Grand Cherokee with the plastic fascia --
14 well, strike that.

15 Has anybody showed you any photographs of
16 Remington Walden's Chrysler at the wreck scene
17 burning?

18 **A. No, sir.**

19 Q. Have you seen any photographs like this of other Grand
20 Cherokees, Cherokees or Jeep Liberties burning after
21 they were hit in the rear?

22 **A. No, sir.**

23 Q. Have you investigated any other -- strike that.

24 Have you investigated any wrecks where Jeep
25 Cherokees, Grand Cherokees or Liberties were struck in

1 the rear resulting in a fire?

2 **A. No.**

3 Q. Isn't it true that Chrysler had a rule that there,
4 quote, should be no crush in the tank area?

5 MS. JEFFREY: Object to the form.

6 **A. Our rule was that there should be no contact with
7 harmful surfaces or unfriendly surfaces.**

8 BY MR. BUTLER:

9 Q. No, sir, that's not true, is it? Isn't it correct,
10 sir, that Chrysler had a rule that, quote, there
11 should be no crush in the tank area, close quote?

12 MS. JEFFREY: Object to form.

13 **A. That's a rule I was unaware of.**

14 MARKED FOR IDENTIFICATION:

15 DEPOSITION EXHIBIT 5-A

16 9:35 a.m.

17 BY MR. BUTLER:

18 Q. Show you Plaintiffs' Number -- Plaintiffs' Exhibit
19 Number 5-A. Isn't this a copy of a Chrysler document
20 produced in this case, Walden vs. Chrysler?

21 **A. That's what it says on top, yes.**

22 Q. This document is part of the agenda for the, quote,
23 rear impact tech club, close quote, December 19, 2001
24 meeting, correct?

25 **A. That's what it says, yes.**

1 Q. Were you a member of the rear impact tech club?

2 **A. Not at this time, but I was previously.**

3 Q. For how long were you a member of the rear impact tech
4 club?

5 **A. Three years.**

6 Q. Did you go to their meetings?

7 **A. Yes, sir.**

8 Q. According to this document, there was a presentation
9 by Mr. Michael Teets on, quote, Review on Fuel
10 Systems, Guidelines and Methodology, close quote,
11 correct?

12 **A. That's what it says, yes.**

13 Q. Bullet point number 2 under that, it reads as follows,
14 quote, determining the crush zone, parenthesis, should
15 be no crush in tank area, close parenthesis, close
16 quote. Did I read that correctly?

17 **A. Yes, sir.**

18 Q. You were unfamiliar with that policy at Chrysler?

19 **A. Three years after I left my job in impact testing and
20 two years after the release of this vehicle.**

21 Q. Did they change the policy?

22 **A. It looks like they did. I was unaware of it, it was
23 not my job.**

24 Q. Are you testifying that the policy for the 1999 Grand
25 Cherokee was there can be crush in the tank area?

1 MS. JEFFREY: Object to form.

2 **A. We had a policy there should be no contact with**
3 **unfriendly surfaces.**

4 MR. BUTLER: Move to strike as
5 nonresponsive.

6 BY MR. BUTLER:

7 Q. That wasn't my question. Are you testifying that
8 Chrysler changed the policy between 1999 and 2001
9 about whether there can be crush in the tank area?

10 MS. JEFFREY: He answered the question.
11 Object to form.

12 **A. I don't know if they changed the policy, we applied**
13 **was different. The fact that it was on this agenda**
14 **doesn't mean they changed the policy.**

15 BY MR. BUTLER:

16 Q. Did Chrysler have in 1998 and 1999 a policy that,
17 quote, there should be no crush in tank area, close
18 quote, yes or no?

19 **A. No, not that I'm aware of.**

20 Q. Well, they did by 2001, didn't they?

21 MS. JEFFREY: Object to form.

22 BY MR. BUTLER:

23 Q. According to this document?

24 MS. JEFFREY: Object to form.

25 **A. This document says it was a review and discussed, did**

1 **not say it's a change of policy, sir.**

2 BY MR. BUTLER:

3 Q. Does that mean Chrysler was thinking about changing
4 the policy?

5 **A. Yes, I think that can be clearly stated that they were**
6 **thinking about changing the policy.**

7 Q. Was the policy before 2001 that there can be crush in
8 the tank area; is that your testimony?

9 **A. If it was contact with a friendly surface.**

10 Q. Is an axle a friendly surface?

11 **A. Most of the axle is a friendly surface.**

12 Q. Is a bumper a friendly surface?

13 **A. Yes.**

14 Q. Is a striking vehicle hitting the gas tank in the rear
15 a friendly surface?

16 MS. JEFFREY: Object to form.

17 **A. We never tested that.**

18 BY MR. BUTLER:

19 Q. Why not?

20 **A. It's not required under compliance under 301.**

21 Q. It happens in the real world, doesn't it?

22 **A. Yes.**

23 Q. Rear impacts happen every day, don't they?

24 **A. Yes.**

25 Q. Are you testifying that Chrysler never tested a Grand

1 Cherokee with rear gas tanks to see what would happen
2 if it got hit in the rear by another vehicle?

3 **A. We tested them according to the 301 compliance form.**

4 MR. BUTLER: Move to strike as
5 nonresponsive.

6 Would you read my question back, please,
7 ma'am?

8 (The following requested portion of the
9 record was read by the reporter at
10 9:39 a.m.:

11 Q. Are you testifying that Chrysler never
12 tested a Grand Cherokee with rear gas tanks
13 to see what would happen if it got hit in
14 the rear by another vehicle?)

15 **A. In the 301 compliance documentation there is another**
16 **vehicle involved, a flat frontal barrier moving that**
17 **hits the rear of the vehicle. This is, in answer to**
18 **your question, we test under 301 compliance the Grand**
19 **Cherokees that were hit in the rear by another moving**
20 **vehicle, the 301 test barrier.**

21 BY MR. BUTLER:

22 Q. Sir, that's just not a true statement, is it?

23 **A. No, it's absolutely true. We test the Grand Cherokee**
24 **to be hit by the 301 moving barrier.**

25 Q. The rear moving barrier test uses a barrier made of

1 plywood, right?

2 **A. The front surface is plywood, it otherwise is the same**
3 **as a vehicle.**

4 Q. Does it have an engine?

5 **A. It does have an engine that's connected to it through**
6 **the I cable.**

7 Q. Does it have a motor? Does it run?

8 **A. If you check --**

9 Q. Can you drive it on the street?

10 **A. It's a --**

11 MS. JEFFREY: Object to form.

12 **A. No, you can't drive the barrier on the street.**

13 BY MR. BUTLER:

14 Q. Sir, is it your testimony that Chrysler never
15 replicated a real-world wreck where a real vehicle hit
16 the rear of a Grand Cherokee with a rear gas tank?

17 **A. Yes, as far as I know we never duplicated the Grand**
18 **Cherokee being hit by a real-world vehicle.**

19 Q. How far is the back of the gas tank from the rear of
20 the Grand Cherokee car?

21 **A. The exact dimension I'm unfamiliar with.**

22 MARKED FOR IDENTIFICATION:

23 DEPOSITION EXHIBIT 6

24 9:41 a.m.

25 BY MR. BUTLER:

1 Q. I show you Plaintiffs' Exhibit Number 6. Maybe this
2 will help you. This is also a Chrysler document,
3 correct?

4 **A. I don't know.**

5 Q. Well, doesn't it say at the bottom, quote, EA
6 12-005-Chrysler-034558, close quote?

7 **A. It does say that.**

8 Q. All right. Doesn't this document tell you that in the
9 1998 Jeep Grand Cherokee the back of the gas tank was
10 11.125 inches from the rear-most point of the rear
11 bumper?

12 **A. It does say that.**

13 Q. Thank you, sir. Isn't it true, sir, that Chrysler
14 knew in 1998 that the Grand Cherokee -- excuse me,
15 strike that.

16 Isn't it true, sir, that Chrysler knew in
17 1998 that the gas tank on the 1999 Grand Cherokee
18 would be crushed in rear impacts?

19 MS. JEFFREY: Object to form.

20 **A. The 1998 Grand Cherokee --**

21 MS. JEFFREY: He said '99.

22 **A. He said '99?**

23 MS. JEFFREY: I think he said '99.

24 **A. The '99 Grand Cherokee does have a crush in rear**
25 **impacts under the 301 compliance standards.**

1 BY MR. BUTLER:

2 Q. Wasn't my question, sir. Move to strike as
3 nonresponsive.

4 Isn't it true, sir, that in 1998 Chrysler
5 knew that the gas tank on the 1999 Grand Cherokee
6 would be crushed in rear impacts?

7 MS. JEFFREY: Object to form.

8 **A. It changes shape. If you define that as crush, yes.**

9 BY MR. BUTLER:

10 Q. It's mashed in in rear impacts; is it not?

11 MS. JEFFREY: Object to form.

12 **A. Mashed is, please, a loose term. Can you define it
13 better?**

14 BY MR. BUTLER:

15 Q. No.

16 **A. It changes shape.**

17 Q. Isn't it true, sir, that in the testing done, the rear
18 moving barrier testing done by Chrysler for the Grand
19 Cherokees with rear gas tanks, the average crush to
20 the rear of the Grand Cherokee was between 6 --
21 between 16 and 25 inches?

22 **A. Which Grand Cherokees?**

23 Q. All of them.

24 **A. There's three specific models.**

25 Q. 1993 through 2004?

1 MS. JEFFREY: Object to form.

2 **A. I'm not aware of the exact numbers of it.**

3 BY MR. BUTLER:

4 Q. Well, let's see if you're aware of this.

5 **A. Okay.**

6 MR. BUTLER: Go off the record for a
7 second.

8 VIDEO TECHNICIAN: Stand by. 9:43, we are
9 off the record.

10 (Off the record at 9:43 a.m.)

11 (Back on the record at 9:46 a.m.)

12 VIDEO TECHNICIAN: 9:46, we are back on the
13 record.

14 MARKED FOR IDENTIFICATION:

15 DEPOSITION EXHIBIT 7-A

16 9:46 a.m.

17 BY MR. BUTLER:

18 Q. Show you Plaintiffs' Exhibit Number 7-A, sir. You
19 recognize this as a Chrysler document; do you not?

20 Sir, doesn't it say on the first page
21 Copyright by DaimlerChrysler Corporation, right at the
22 top?

23 MS. JEFFREY: In red.

24 **A. Yes.**

25 BY MR. BUTLER:

1 Q. All right. That's my only question right now, do you
2 recognize this as a Chrysler document? It's obviously
3 a Chrysler document; is it not?

4 **A. It says Chrysler -- DaimlerChrysler Corporation at the**
5 **top of the document.**

6 Q. And under -- at the bottom of the first page where it
7 says 7.9, typical example of model and output data,
8 this document says, quote, This section contains
9 information pertaining to 1999 WJ to serve as an
10 example. Did I read that correctly?

11 **A. Yes.**

12 Q. WJ was Grand Cherokee, right?

13 **A. Yes.**

14 Q. All right. And if you would, look on over at page 7.
15 There's a chart there that charts the amount of crush
16 in the 301 rear moving barrier 30-mile-per-hour crash
17 test done by Chrysler on Grand Cherokees, correct?

18 MS. JEFFREY: Object to form.

19 **A. Difficult to tell if it's on a Grand Cherokee. It's a**
20 **typical example of model and output data.**

21 BY MR. BUTLER:

22 Q. Didn't we just read on the first page, quote, This
23 section contains information pertaining to 1999 WJ to
24 serve as an example, close quote? Isn't that what
25 this entire section is about?

1 **A. We're still on the same section?**

2 Q. Yes, sir. It says on the top of this page 7, quote,
3 709, typical example of model and output data, close
4 quote, does it not?

5 **A. Yes, it does.**

6 Q. Okay. And doesn't this chart, this graph, show that
7 in Chrysler's own 301 30-mile-per-hour plywood barrier
8 crash test of the Grand Cherokee, the crush to the
9 rear was between 20 and 30 inches?

10 MS. JEFFREY: Object to form.

11 **A. You know, I'd like to agree with you but that vertical**
12 **axis isn't labeled and I can't read the units on it,**
13 **so it's hard for me to say if that's inches or**
14 **centimeters or millimeters, sir.**

15 BY MR. BUTLER:

16 Q. Sir, haven't you previously testified under oath that
17 in the crash testing with which you were familiar on
18 Grand Cherokees, the crush to the rear ran from 16 to
19 24 inches?

20 **A. I don't recall.**

21 Q. Well, I'll show you a copy of your deposition taken in
22 the case of Natasha Austin and Nicole Austin vs.
23 Chrysler, Supreme Court of the State of New York on
24 May 26 and May 27, 2005. Do you remember that
25 deposition?

1 **A. No.**

2 Q. It was taken in Troy, Michigan, and I'll ask you to
3 turn --

4 MS. JEFFREY: Can you just hold a second so
5 I can get a copy of --

6 MR. BUTLER: Do you want to go off the
7 video?

8 MS. JEFFREY: Yes, for a second.

9 MR. BUTLER: Okay.

10 MS. JEFFREY: Thank you.

11 VIDEO TECHNICIAN: 9:51, we are off the
12 record.

13 (Discussion off the record at 9:51 p.m.)

14 (Back on the record at 9:52 a.m.)

15 VIDEO TECHNICIAN: 9:52, we are back on the
16 record.

17 MR. BUTLER: Read the question back.

18 (The following requested portion of the
19 record was read by the reporter at
20 9:54 a.m.):

21 Q. Well, I'll show you a copy of
22 your deposition taken in the case of
23 Natasha Austin and Nicole Austin vs.
24 Chrysler, Supreme Court of the State of New
25 York on May 26 and May 27, 2005. Do you

1 remember that deposition?)

2 **A. No.**

3 BY MR. BUTLER:

4 Q. Well, does it appear to be your sworn testimony, the
5 document that's in front of you?

6 **A. Yes.**

7 Q. Look at page 127, if you would. You got that page?

8 **A. Yes.**

9 Q. And I'm going to read this, and I want -- my question
10 to you will be whether or not I read it correctly.

11 Line 12, question by Ms. Spagnole: Okay,
12 so that would be a range given what you tested of
13 dynamic crush in a rear impact for this '97 Jeep Grand
14 Cherokee?

15 Answer: I'm looking for maximums, I'm
16 looking for maximums. 25 at the high end is
17 what you could expect. 16 -- 25 to 16, I would
18 say, is a normal range for this vehicle, you
19 know, at the kinds of weight and speeds that we
20 hit, closed quote.

21 Did I read that correctly?

22 **A. Yes, you read that correctly.**

23 Q. Are you familiar with the next document I want to show
24 you?

25 MS. JEFFREY: Is this -- excuse me,

1 Counsel, does this have an exhibit number or are you
2 just referring to the --

3 MR. BUTLER: I didn't have an exhibit
4 number on it.

5 MS. JEFFREY: Okay, that's fine, just...

6 MARKED FOR IDENTIFICATION:

7 DEPOSITION EXHIBIT 8-A

8 9:55 a.m.

9 BY MR. BUTLER:

10 Q. I'll show you the next exhibit, which is Plaintiffs'
11 Exhibit Number 8-A, and this is a chart that was
12 within one of the exhibits that you talked about in
13 that deposition in the New York case, correct, or do
14 you remember that?

15 A. I don't remember.

16 Q. Okay. Well, I'll get back to that in a minute. You
17 do recognize this as a Chrysler document; do you not?

18 A. Yes.

19 Q. And it says at the top, 1996 ZJ Grand Cherokee Impact
20 Development Test Summary, correct?

21 A. **1996 ZJ Grand Cherokee Impact Development Test**
22 **Summary, yes.**

23 Q. All right. And on the right it's got the measurements
24 of crush to the rear of the vehicle, correct?

25 A. **Yes, it does.**

1 Q. And those measurements of crush run from 19.9 inches
2 to 24 inches, correct, 24.1?

3 **A. For all test types, it appears that's correct.**

4 Q. All right. Now let me ask you this, sir, would you
5 agree with me that 19.9 inches is more than 11 inches?

6 **A. Yes.**

7 Q. Would you agree with me that 24 inches is twice the --
8 more than twice 11 inches?

9 **A. Yes.**

10 MARKED FOR IDENTIFICATION:

11 DEPOSITION EXHIBIT 9-B

12 9:56 a.m.

13 BY MR. BUTLER:

14 Q. Well, let me show you Plaintiffs' Exhibit Number 9-B.
15 This is the entire document from which Plaintiffs'
16 Exhibit 8-B, the chart, is taken; is that correct?

17 MS. JEFFREY: You mean 8-A?

18 MR. BUTLER: Yeah, 8-A, whatever it was.

19 BY MR. BUTLER:

20 Q. The chart is the fourth page of this document, right?

21 **A. Yes.**

22 Q. All right. Isn't it true that Chrysler even had a
23 rule that when Chrysler did these 30-mile-an-hour rear
24 moving barrier crash tests on Grand Cherokees, the
25 technical staff was not supposed to put any

1 instruments within the back 24 inches of the Grand
2 Cherokee?

3 **A. The technical instruments, it's a very broad term, and**
4 **I think we do have accelerometers in the rear of the**
5 **vehicle.**

6 MR. BUTLER: Move to strike as
7 nonresponsive.

8 Will you read my question back to him?

9 COURT REPORTER: Yes.

10 (The following requested portion of the
11 record was read by the reporter at
12 9:58 a.m.):

13 Q. All right. Isn't it true that
14 Chrysler even had a rule that when Chrysler
15 did these 30-mile-an-hour rear moving
16 barrier crash tests on Grand Cherokees, the
17 technical staff was not supposed to put any
18 instruments within the back 24 inches of
19 the Grand Cherokee?)

20 **A. Not that I'm aware of, no, I don't think we did.**

21 MARKED FOR IDENTIFICATION:

22 DEPOSITION EXHIBIT 10-A

23 9:58 a.m.

24 BY MR. BUTLER:

25 Q. I'll show you Plaintiffs' Exhibit Number 10-A. You

1 recognize this as a Chrysler document; do you not?

2 **A. It's not a document I've seen before.**

3 Q. Is it a Chrysler document?

4 **A. I can't say for certain.**

5 Q. It says at the top, quote, Tech club fuel sector
6 status presentation meeting minutes August 9, 2000,
7 rear impact tech club, close quote. Did I read that
8 correctly?

9 **A. Yes.**

10 Q. On August 9, 2000 were you still a member of the rear
11 impact tech club?

12 **A. No, sir.**

13 Q. But that's the same tech club we talked about earlier,
14 isn't it?

15 **A. Yes, sir.**

16 Q. All right. Now, if you go over here and look at the
17 page that's marked at the top HAM -- this is another
18 one of those Bates stamps, HAM 8 -- 80025, the last
19 two numbers are 25. Do you see that page?

20 **A. Yes.**

21 Q. Doesn't it say right there -- and I'm going to hold
22 this up and ask the video operator to put the camera
23 on it. Can you see that?

24 VIDEO TECHNICIAN: Stand by. Yes, sir.

25 BY MR. BUTLER:

1 Q. Doesn't it say right there, quote, No accelerometers
2 or other instrumentation in rear 24 inches of vehicle.
3 These channels are often lost due to significant crush
4 in that area and are non-value added. Did I read that
5 correctly?

6 **A. You read it correctly underneath test procedure**
7 **improvements.**

8 Q. Thank you, sir.

9 **A. That was after I left.**

10 Q. Well, the reason for the new rule, the improvement not
11 to put any instruments in the back 24 inches, is
12 because the back 24 inches was getting crushed,
13 correct?

14 MS. JEFFREY: Object to form.

15 **A. It says there lost, not that they're crushed, it says**
16 **that they are lost.**

17 BY MR. BUTLER:

18 Q. The reason Chrysler adopted a rule not to put any
19 instruments in the back 24 inches of the Grand
20 Cherokee during crash tests was because that was in
21 the crush zone --

22 MS. JEFFREY: Object to form.

23 BY MR. BUTLER:

24 Q. -- isn't that true?

25 **A. Speculation on your part. I was not part of the**

1 **impact test club at that time.**

2 Q. Well, in the tests that you did you testified under
3 oath that the crush to the rear of the Grand Cherokee
4 was 16 to 25 inches, didn't you? We just read that a
5 minute ago?

6 **A. We did.**

7 Q. Isn't it true the chart shows -- or the graph shows
8 that the crush to the rear of the Grand Cherokees was
9 20 to 30 inches?

10 **A. I can't read the chart, sir. It's unlabeled.**

11 Q. Well, the gas tank is in the back 24 inches of the
12 Grand Cherokee; is it not?

13 **A. Yes, sir.**

14 Q. The gas tank, the back of the gas tank, is 11.125
15 inches from the back of the car, correct?

16 **A. Yes, sir.**

17 Q. What happens if the gas tank gets hit in a rear impact
18 by a striking car?

19 MS. JEFFREY: Object to form.

20 **A. A striking car at the back of a Grand Cherokee was a
21 test that we never ran in my development period.**

22 BY MR. BUTLER:

23 Q. In the real world what's going to happen if a striking
24 car hits the back of the Grand Cherokee and has the
25 same amount of crush that you all were seeing in these

1 crash tests, up to 24 inches?

2 MS. JEFFREY: Object to form.

3 **A. I don't like to speculate on an answer that I've never**
4 **run.**

5 BY MR. BUTLER:

6 Q. What's the gas tank made out of in the Grand Cherokee?

7 **A. High-density polyethylene.**

8 Q. Plastic, right?

9 **A. It's a very tough form of plastic.**

10 Q. It's plastic, right?

11 **A. It's like Little Tikes toys, yes.**

12 Q. Okay. And if the back 24 inches of the Grand Cherokee
13 is crushed in a real-world wreck by a striking vehicle
14 hitting the Grand Cherokee in the rear, there's a real
15 potential for the gas tank to be punctured; is there
16 not?

17 MS. JEFFREY: Object to form.

18 **A. There wasn't a potential for it to be punctured in the**
19 **testing I conducted. It didn't contact any unfriendly**
20 **surfaces.**

21 BY MR. BUTLER:

22 Q. I'm talking about in the real world, sir. Isn't it a
23 real potential for puncture?

24 **A. I'd speculate on real world. I did not perform**
25 **real-world tests.**

1 Q. What happens when a gas tank at the rear of a Grand
2 Cherokee gets punctured in a real wreck?

3 **A. I don't know.**

4 Q. You've got no familiarity with the fires that have
5 happened as a result of that?

6 **A. I'd have to speculate on what happened in real-world
7 testing.**

8 Q. Would you agree with me, sir, that what happens to the
9 occupants of a Grand Cherokee sold by Chrysler is more
10 important than what happens to Chrysler's crash test
11 instruments?

12 MS. JEFFREY: Object to form.

13 **A. Yes, what happens to people is more important than
14 what happens to electronic instruments.**

15 BY MR. BUTLER:

16 Q. Isn't it true, sir, that the reason Chrysler stopped
17 putting instruments in the back 24 inches of Grand
18 Cherokees during Chrysler's crash testing was because
19 that 24 inches was in the crush zone?

20 **A. It states clearly that instrumentation was lost and
21 that's why they didn't put it in the crush zone.**

22 MS. JEFFREY: Counsel, when you get to a
23 good point to take a break, could we take five
24 minutes? It's been about an hour.

25 BY MR. BUTLER:

1 Q. Isn't it true, sir, that the 24 inches of crush we've
2 been talking about was not in real-world wrecks but
3 was, instead, in Chrysler's 30-mile-per-hour rear
4 moving barrier testing?

5 **A. Yes, that's the maximum crush, 24 hours (sic) in a**
6 **rear moving test.**

7 Q. You -- will you agree that real rear impact crashes
8 aren't always at 30 miles per hour or less?

9 **A. It's speculation that people run into each other at**
10 **less than 30 miles an hour, but I assume it to be**
11 **true.**

12 Q. They also run into each other at more than 30 miles an
13 hour, don't they?

14 **A. I assume it to be true.**

15 Q. Automakers know that, don't they?

16 **A. I assume it to be true.**

17 Q. Everybody knows that, don't they?

18 **A. Everybody doesn't know that.**

19 Q. Well, that is a problem, you are absolutely correct,
20 and we're going to get back to that in a moment about
21 what people know and what people don't know.

22 Isn't it true that Chrysler had leaks in
23 the gas tanks even when the Jeeps were hit with a rear
24 moving barrier at only 30 miles per hour?

25 **A. Yes, in certain tests our vehicles did leak.**

1 Q. Will you agree with me, sir, that in the real world,
2 wrecks that happen at more than 30 miles an hour --
3 strike that.

4 Will you agree with me, sir, that in the
5 real world, rear impact wrecks into the back of a
6 Grand Cherokee that happens at more than 30 miles an
7 hour is going to cause even more crush damage?

8 MS. JEFFREY: Object to form.

9 **A. I don't know.**

10 MR. BUTLER: Let's go off the video just a
11 minute.

12 VIDEO TECHNICIAN: 10:06, we are off the
13 record.

14 (Recess taken at 10:06 a.m.)

15 (Back on the record at 10:14 a.m.)

16 VIDEO TECHNICIAN: It is 10:14, we are back
17 on the record.

18 BY MR. BUTLER:

19 Q. Sir, isn't it true that Chrysler knew in 1999 that the
20 gas tank on the Grand Cherokee needed more protection?

21 MS. JEFFREY: Object to form.

22 **A. Which Grand Cherokee, sir?**

23 BY MR. BUTLER:

24 Q. The one with the rear gas tank.

25 MS. JEFFREY: Object to form.

1 **A. Three of them had rear gas tanks, which one?**

2 BY MR. BUTLER:

3 Q. Any of them. Let me ask the question again.

4 **A. Okay.**

5 Q. Isn't it true, sir, that Chrysler knew in 1999 that
6 the gas tank on the Grand Cherokee needed more
7 protection?

8 **A. That's the same question. Which Grand Cherokee, sir?**

9 Q. Why do you ask me that question, why does it make a
10 difference?

11 **A. Because there are three distinct models that are
12 called Grand Cherokee.**

13 Q. Why does it make a difference, is my question to you?

14 **A. They are different gas tanks, different fuel systems,
15 different structures.**

16 Q. All right, let's talk about that. Let's talk about
17 the 1993 through 1998 Jeep Grand Cherokee, you all
18 called that the --

19 MS. JEFFREY: ZJ.

20 BY MR. BUTLER:

21 Q. -- ZJ; is that right?

22 **A. Yes, sir.**

23 Q. Now, that's a brand designation you all used inside
24 Chrysler, correct?

25 **A. It's a model designation used by Chrysler.**

1 Q. Model designation. Do the words ZJ appear anywhere on
2 the actual sold Grand Cherokee?

3 **A. I'm not exactly sure they don't, but I'm not sure they**
4 **do.**

5 Q. Have you ever seen them on a Grand Cherokee?

6 **A. I have.**

7 Q. One that's been sold that somebody's driving around in
8 the United States?

9 **A. Yes.**

10 Q. ZJ?

11 **A. Uh-huh.**

12 Q. Okay. The 1993 through 1998 Grand Cherokee had a rear
13 gas tank, correct?

14 **A. Yes, it did.**

15 Q. The 1998 through 2004 Grand Cherokee had a rear gas
16 tank, correct?

17 **A. Yes, it did.**

18 Q. The 2005 and later model year Grand Cherokee had a
19 midships --

20 **A. I'm unaware of what --**

21 Q. -- gas tank?

22 Okay. Well, that's three; was there
23 another Grand Cherokee?

24 **A. There was a ZJ, a WJ and a WK.**

25 Q. WK is 2005 with the midships gas tank, correct?

1 **A. I'm not sure what they did after I left.**

2 Q. After you left what?

3 **A. After I left the impact development zone.**

4 Q. You still work at Chrysler, aren't you?

5 **A. Yes.**

6 Q. You've been working continuously there for almost 29
7 years?

8 **A. Yes.**

9 Q. Is it your testimony you don't know where the gas tank
10 is on the 2005 model Grand Cherokee?

11 **A. I think it's in the rear, I think it's in the middle,
12 I don't know where it is. I'm not aware of where it
13 is exactly.**

14 Q. You don't know that it's in the midships location?

15 **A. No.**

16 Q. Back to my question, isn't it true that Chrysler knew
17 in 1999 that the rear gas tank on Jeep Grand Cherokees
18 needed more protection?

19 MS. JEFFREY: Object to form.

20 **A. The rear gas tanks in which vehicle?**

21 BY MR. BUTLER:

22 Q. The Grand Cherokees.

23 **A. Which Grand Cherokees?**

24 Q. Any of them.

25 **A. I can't say that we knew that they needed more**

1 **protection.**

2 Q. All right. Isn't it true that in 1999 Chrysler ran a
3 crash test on the 1999 Grand Cherokee with the tank
4 modified to give it greater protection from rear
5 impact?

6 MS. JEFFREY: Object to form.

7 **A. In 1999 Grand Cherokee was modified to prevent**
8 **leakage.**

9 MARKED FOR IDENTIFICATION:

10 DEPOSITION EXHIBIT 15-A

11 10:19 a.m.

12 BY MR. BUTLER:

13 Q. Show you Plaintiffs' Exhibit Number 15-A. Well,
14 strike that.

15 You said 1999 Grand Cherokee was modified
16 to prevent leakage. It was only modified for the
17 crash test; isn't that correct?

18 **A. It was modified primarily for the crash test but**
19 **that's not the only benefit.**

20 Q. The modifications that Chrysler used in that crash
21 test of a 1999 Grand Cherokee were not put into the
22 actual production run Grand Cherokee that people
23 bought, was it?

24 **A. I don't know about that, I thought they were.**

25 Q. Show you Plaintiffs' Exhibit Number 15-A. You

1 recognize this as a Chrysler safety test, vehicle
2 crash test letter; do you not?

3 **A. Yes, I do.**

4 Q. And the -- it's the report on a test, the test date
5 was November 18, 1999, correct?

6 **A. Yes, it was.**

7 Q. Do you know when the Grand Cherokee in which Remington
8 Walden died was first sold by Chrysler or a Chrysler
9 dealer?

10 **A. Can you repeat the question? I was reading, sorry.**

11 MR. BUTLER: Would you read it back to him?
12 (The following requested portion of the
13 record was read by the reporter at
14 10:20 a.m.):

15 Q. Do you know when the Grand
16 Cherokee in which Remington Walden died was
17 first sold by Chrysler or a Chrysler
18 dealer?)

19 **A. No.**

20 BY MR. BUTLER:

21 Q. This Plaintiffs' Exhibit Number 15-A, this crash test
22 report dated November 18, 1999, it says the test
23 purpose is, quote, primary 2004 USA 301 development,
24 correct?

25 **A. Yes, it does.**

1 Q. And under build condition it shows that the Grand
2 Cherokee for this test has been modified, correct?

3 **A. Yes, it does.**

4 Q. It says that the reason for the modifications on the,
5 quote, current WJ body, close quote, was to bring the
6 body to the WK concept, correct?

7 **A. Yes, it does.**

8 Q. It says, quote, structural cage to represent '04 model
9 year concept, correct?

10 **A. Yes, it does.**

11 Q. One of the things that was changed was that there was
12 a, quote, body rear bumper beam installed, close
13 quote, correct?

14 **A. Yes.**

15 Q. What's a bumper beam?

16 **A. I can't say for sure, you know, the photograph would
17 show it to be that green section.**

18 Q. Well, I think the bumper beam would be the mid one,
19 wouldn't it?

20 **A. Yeah, it could be either.**

21 Q. All right. Isn't it true that what Chrysler did for
22 this test was they put a cage around the rear gas tank
23 of the 1999 Grand Cherokee?

24 Will you show this on the video?

25 VIDEO TECHNICIAN: Yes, sir.

1 BY MR. BUTLER:

2 Q. Isn't that true?

3 **A. They put a frame around it.**

4 Q. What's that green thing?

5 **A. It's a green thing.**

6 Q. I'll take the word frame instead of cage. We'll call
7 it a frame. And isn't it true that for this crash
8 test on a 1999 Grand Cherokee, instead of having a
9 plastic fascia and Styrofoam, Chrysler put in a steel
10 beam as a real bumper, that's in red, right? Isn't
11 that right?

12 **A. They had a steel bumper installed in this car.**

13 Q. Now, isn't it true, sir, that Chrysler never put
14 either the green cage around the gas tank or the steel
15 bumper that's shown in red on this exhibit on any
16 Grand -- 1999 Grand Cherokee that Chrysler actually
17 sold to the people of the United States?

18 **A. I don't know, this is beyond my time when I was in
19 this testing development area.**

20 Q. Have you ever seen a real-world Grand Cherokee sold by
21 Chrysler to American citizens that had a cage like
22 this or a real steel bumper like this on it?

23 **A. I've never seen one with a cage like that.**

24 Q. Have you ever seen one with a bumper like that?

25 **A. It's really hard for me to tell exactly what this**

1 bumper is different between the steel bumper that's
2 standard and this bumper. We do have a steel cross
3 member that connects the two rear frame rails, which
4 is very similar to what this red bumper appears to be.

5 MR. BUTLER: Move to strike --

6 A. I can't --

7 MR. BUTLER: Move to strike as
8 nonresponsive.

9 A. I can't tell the difference.

10 BY MR. BUTLER:

11 Q. It says here -- or it indicates here, does it not,
12 that at the time -- at this time in November of 1999
13 Chrysler was thinking about putting a structural cage
14 around the gas tank for a future model of the Grand
15 Cherokee?

16 A. Yes, it indicates that that was a future concept.

17 Q. All right. That didn't happen, did it?

18 A. Not to my knowledge.

19 Q. Yes, sir. Isn't it the truth that after this crash
20 test was done on a 1999 Grand Cherokee with a cage
21 around the tank and a real steel bumper, what Chrysler
22 decided to do was to move the gas tank away from the
23 rear?

24 A. I can't say.

25 Q. Isn't it true that for the 2005 model year and later

1 Grand Cherokees the gas tank was in the midships
2 location?

3 **A. I'm not aware of it personally.**

4 Q. Never seen that?

5 **A. No.**

6 Q. Isn't it true, sir, that the 2005 model year Grand
7 Cherokees were first sold in the fall of 2004?

8 **A. Phew, I don't know.**

9 Q. Isn't it true that in this test Chrysler didn't do a
10 rear moving barrier 30-mile-per-hour test?

11 **A. The test letter states it was a 49.8-mile-per-hour
12 test.**

13 Q. And it was an offset test, wasn't it?

14 **A. I didn't read that, just a moment. This document
15 doesn't indicate that it was a -- well, it says rear
16 left and from that you could imply it was offset,
17 but...**

18 Q. Look at the third line of the document. Doesn't it
19 say 50 miles per hour, 70 percent rear offset?

20 **A. Ah. Yes, sir, it does say 70 percent rear offset.**

21 Q. Isn't it true that Chrysler obviously concluded from
22 this crash test where the 1999 Grand Cherokee's gas
23 tank and had a frame put around it and a rear real
24 steel bumper installed that the next generation Grand
25 Cherokees' gas tank had to be moved?

1 MS. JEFFREY: Object to form.

2 **A. And I can't speculate on what they concluded.**

3 BY MR. BUTLER:

4 Q. Do you have any knowledge of Chrysler ever telling any
5 of the -- of its customers or American citizens that
6 in 1999 or 2000 Chrysler had concluded it had to move
7 the gas tank on the Grand Cherokees from the rear?

8 MS. JEFFREY: Object to form.

9 **A. No, I don't have any knowledge of that.**

10 BY MR. BUTLER:

11 Q. Do you know whether or not Chrysler reinforced the gas
12 tank -- strike that.

13 Do you know whether or not Chrysler
14 reinforced the rear of the Grand Cherokee to put a
15 cage around the gas tank and a real steel bumper on it
16 for the 2000 model year Grand Cherokees?

17 **A. I don't know.**

18 Q. Do you know whether or not Chrysler reinforced in the
19 same way the 2001 Grand Cherokees?

20 **A. I don't know.**

21 Q. Do you know whether or not Chrysler reinforced in the
22 same way the rear of the 2002 Grand Cherokees?

23 **A. No, I don't.**

24 Q. Do you know whether or not Chrysler reinforced in the
25 same way the rear of the 2003 Grand Cherokees?

1 **A. No.**

2 Q. Do you know whether or not Chrysler reinforced in the
3 same way the rear of the 2004 Grand Cherokees?

4 **A. No.**

5 Q. Do you know if Chrysler ever told its customers and
6 the American people that Chrysler had concluded that
7 the gas tank had to be moved away from the rear in the
8 Grand Cherokees?

9 MS. JEFFREY: Object to form.

10 **A. I don't know.**

11 MR. BUTLER: Off the video just a minute.

12 VIDEO TECHNICIAN: 10:27, we are off the
13 record.

14 (Off the record at 10:27 a.m.)

15 (Back on the record at 10:29 a.m.)

16 VIDEO TECHNICIAN: It is 10:29, we are back
17 on the record.

18 BY MR. BUTLER:

19 Q. Do you know of any crash tests Chrysler did into the
20 rear of any Grand Cherokees with rear gas tanks at
21 more than 30 miles an hour other than this one
22 50-miles-per-hour offset crash test we've been talking
23 about?

24 MS. JEFFREY: Object to form.

25 **A. No, I don't know of any other ones.**

1 BY MR. BUTLER:

2 Q. Isn't it true that even back in the '90s Chrysler was,
3 in fact, running 50-mile-per-hour rear impact crash
4 tests on some vehicles?

5 **A. Not to my knowledge.**

6 MR. BUTLER: Off the video just a minute.

7 VIDEO TECHNICIAN: It is 10:30, we are off
8 the record.

9 (Off the record at 10:30 a.m.)

10 (Back on the record at 10:31 a.m.)

11 VIDEO TECHNICIAN: It is 10:31, we are back
12 on the record.

13 BY MR. BUTLER:

14 Q. Isn't it true that Chrysler had a rule that in rear
15 impact wrecks contact with an unfriendly surface is
16 unacceptable?

17 **A. That's true.**

18 Q. Will you agree that a car or truck hitting the rear of
19 a Grand Cherokee is definitely an unfriendly surface?

20 MS. JEFFREY: Object to form.

21 **A. It's possible it could be.**

22 BY MR. BUTLER:

23 Q. Will you agree that there is nothing to prevent the
24 gas tank of a Grand Cherokee from getting hit when a
25 car hits the rear of a Grand Cherokee?

1 **A. Well, there's the 11 inches of structural steel that**
2 **you previously mentioned so there is not nothing,**
3 **there is a substantial amount of things to prevent it**
4 **from being hit.**

5 Q. What's between the striking vehicle and the gas tank,
6 sir?

7 **A. 11 inches of crush area that you just demonstrated.**

8 Q. Sir, that's not true, is it?

9 **A. You just showed me that there was 11 inches from the**
10 **rearward most point of the gas tank to the rearward**
11 **most point of the bumper.**

12 Q. Look at page Exhibit Number 1 again, sir. Doesn't the
13 gas tank hang down below the bumper, below the face
14 bar?

15 **A. It hangs below the fascia.**

16 Q. What's between the gas tank and a striking vehicle?

17 **A. 11 inches.**

18 Q. That's above the gas tank, isn't it, sir?

19 **A. Yes.**

20 Q. And that 11 inches is not structural steel, it's just
21 the metal of the car; isn't that correct?

22 MS. JEFFREY: Object to form.

23 **A. The metal of the car is the structural steel, sir.**

24 BY MR. BUTLER:

25 Q. How thick is that stuff?

1 **A. I don't know.**

2 Q. There's not even a bumper there, is there?

3 **A. There is a structural cross member that connects the**
4 **two rear frame rails.**

5 Q. It's a piece of sheet metal, isn't it, sir?

6 **A. It's a piece of metal.**

7 Q. And on top of that piece of metal in the rear of the
8 car is a piece of Styrofoam, correct?

9 **A. Yes, sir.**

10 Q. And on that -- over that is this plastic fascia,
11 correct?

12 **A. Yes, sir.**

13 Q. And I'll show you again Plaintiffs' Exhibit Number 3
14 you've got there, this is what the back of the car
15 looks like, isn't it, sir?

16 **A. Yes, sir.**

17 MR. BUTLER: Off the video just a minute.

18 VIDEO TECHNICIAN: 10:34, we are off the
19 record.

20 (Off the record at 10:34 a.m.)

21 (Back on the record at 10:38 a.m.)

22 VIDEO TECHNICIAN: 10:38, we are back on
23 the record.

24 BY MR. BUTLER:

25 Q. How far below the bottom of the fascia, that plastic

1 strip, does the gas tank hang on the Grand Cherokee
2 with rear gas tanks?

3 **A. I believe it's 6-A, your exhibit shows it to be 6**
4 **inches, if I read the chart correctly.**

5 Q. Would you agree with me, sir, that the Jeeps are
6 higher off the ground than other passenger cars?

7 **A. They can be.**

8 Q. What happens if the Jeep is hit in the rear by a
9 passenger car with a bumper that is lower than the
10 bottom of that fascia strip?

11 MS. JEFFREY: Object to form.

12 **A. It's a test I never ran; I can't speculate on what**
13 **would happen.**

14 BY MR. BUTLER:

15 Q. It's not speculation, sir. The bumper of the striking
16 car would hit the gas tank; would it not?

17 MS. JEFFREY: Object to form.

18 **A. I don't know.**

19 BY MR. BUTLER:

20 Q. What happens if when the Jeep Grand Cherokee is hit in
21 the rear the Grand Cherokee is braking, what happens
22 as a matter of logic?

23 MS. JEFFREY: Object to form.

24 BY MR. BUTLER:

25 Q. In personal experience?

1 **A. The vehicle stops.**

2 Q. Something else happens, doesn't it, doesn't the back
3 of the vehicle go up when you hit the brakes?

4 **A. It can.**

5 Q. What happens if the striking vehicle is braking when
6 it hits the back of a Jeep with a rear gas tank?

7 MS. JEFFREY: Object to form.

8 **A. Speculation.**

9 BY MR. BUTLER:

10 Q. The nose goes down; does it not?

11 **A. It can.**

12 Q. Isn't it true, sir, that if a Jeep with rear gas tanks
13 is hit by a car with a bumper lower than the fascia
14 strip on the back of the Jeep, and if when a Jeep with
15 a rear gas tank is hit is braking, and if when the
16 Jeep with the rear gas tanks is hit in the rear, the
17 car that hits it is braking, in any of those three
18 circumstances what's going to most likely happen is
19 the gas tank takes a direct hit?

20 MS. JEFFREY: Object to form.

21 **A. It's speculation, I've never tested this scenario.**

22 BY MR. BUTLER:

23 Q. Did Chrysler ever test that scenario to your
24 knowledge?

25 **A. Not to my knowledge, no.**

1 Q. Have you ever seen any documents about -- have you
2 ever seen any Chrysler documents discussing what
3 happens in those events?

4 **A. No, sir.**

5 Q. All right. To your knowledge, was there ever any
6 discussion at Chrysler about what happens in those
7 events?

8 **A. No, sir.**

9 Q. You never heard anybody talk about what's going to
10 happen if when these Jeeps with the rear gas tanks
11 gets hit by a passenger car whose bumper is below the
12 fascia strip; nobody ever talked about that?

13 **A. I don't recall any conversation.**

14 MS. JEFFREY: I'm just going to object to
15 the extent you're asking him what may have happened at
16 Chrysler. He is --

17 MR. BUTLER: I'm asking what he heard.

18 MS. JEFFREY: Okay, you can ask him what he
19 heard.

20 BY MR. BUTLER:

21 Q. To your knowledge, did anybody at Chrysler ever talk
22 about the impact that braking of the target vehicle,
23 which is the Grand Cherokee with the rear gas tank, or
24 the striking vehicle would have on the vulnerability
25 of the gas tank?

1 **A. I don't recall any.**

2 Q. Isn't it true that if you've got a gas tank that hangs
3 6 inches below the bottom of the fascia strip on the
4 Jeep Cherokees and is just 11 inches inside the back
5 of that fascia strip, that gas tank is obviously
6 vulnerable to rear impact?

7 MS. JEFFREY: Object to form.

8 **A. I wouldn't say it's obvious.**

9 BY MR. BUTLER:

10 Q. It is vulnerable to rear impact, is it not?

11 **A. It is vulnerable to rear impact.**

12 Q. Thank you, sir. Did you do any work on the 1999
13 through 2004 Grand Cherokees?

14 **A. On the 1999 vehicle, yes.**

15 Q. What is the difference in the rear of the 1994 through
16 2004 Grand Cherokee compared to the 1993 through 1998
17 Grand Cherokee?

18 **A. Can you give me the model years again, please?**

19 MS. JEFFREY: Yeah, your model years didn't
20 make sense there.

21 MR. BUTLER: Okay.

22 MS. JEFFREY: You had them overlapping.

23 MR. BUTLER: I'll strike that. Let me
24 start over.

25 BY MR. BUTLER:

1 Q. What is the difference between -- strike that, too.

2 What is the difference in the rear between
3 the 1993 through '98 Grand Cherokees and the 1999
4 through 2004 Grand Cherokees?

5 **A. There's a great deal of differences between those**
6 **vehicles. There's a different architecture, different**
7 **materials --**

8 Q. In the rear I'm talking about?

9 **A. Different architecture, different materials, different**
10 **systems. It's a long list. I couldn't detail every**
11 **part, but if we looked at it I'm sure there's a long**
12 **list of different part numbers indicating different**
13 **suppliers, different builds and different designs.**

14 Q. All right. Did both of those vehicles have rear gas
15 tanks?

16 **A. Yes, they do.**

17 Q. In both those vehicles, is the gas tank the lowest
18 thing in the rear of the vehicle under the spare tire?

19 MS. JEFFREY: Object to form.

20 **A. The lowest thing under the vehicle?**

21 BY MR. BUTLER:

22 Q. At the very rear. There's nothing below it in either
23 one of those vehicles, is there?

24 **A. Not that I recall, no.**

25 Q. All right. In both those vehicles does the gas tank

1 sit in a brush guard?

2 **A. I believe it does.**

3 Q. In both those vehicles is the gas tank -- the back of
4 the gas tank about 11 inches from the rear-most point
5 of the fascia strip?

6 **A. According to your chart, yes.**

7 Q. Yeah. As a matter of fact, I do know of one change
8 that was made starting with the 1999 Grand Cherokee,
9 instead of the back of the gas tank being 11.125
10 inches from the back of the fascia strip it is 11.375
11 inches, correct?

12 **A. I don't know of that exact --**

13 Q. That's what the chart says, isn't it?

14 **A. It says 11.125.**

15 Q. You're right, excuse me. What's the difference --
16 well, strike that.

17 Let's go off the video just a minute. Step
18 outside.

19 VIDEO TECHNICIAN: 10:44, we are off the
20 record.

21 (Recess taken at 10:44 a.m.)

22 (Back on the record at 10:49 a.m.)

23 VIDEO TECHNICIAN: 10:49, we are back on
24 the record.

25 BY MR. BUTLER:

1 Q. In your long experience at Chrysler, did anyone ever
2 question putting the gas tank at the rear of these
3 Jeeps?

4 **A. Not that I recall.**

5 Q. Never heard anybody say anything about that?

6 **A. No, sir.**

7 Q. Did you ever hear anybody suggest that maybe that was
8 a bad idea?

9 **A. No, sir.**

10 Q. That maybe the gas tank would be safer if it was
11 located at midships?

12 MS. JEFFREY: Object to form.

13 **A. No, sir.**

14 BY MR. BUTLER:

15 Q. Who had the responsibility at Chrysler of monitoring
16 the actual field performance of Jeeps with rear gas
17 tanks in real-world rear impacts?

18 **A. I would assume the director of vehicle development --**

19 Q. Do you know that?

20 **A. -- of the safety office.**

21 **No, sir.**

22 Q. Did you -- were you ever privy to or get any reports
23 about that?

24 **A. No, sir.**

25 Q. Have you kept up with the field performance of these

1 Jeeps with rear gas tanks at all?

2 **A. No, sir.**

3 Q. Have you seen any news accounts about it?

4 **A. Yes, sir.**

5 Q. When most recent?

6 **A. Last spring when there was a recall announced in the**
7 **newspaper, sir.**

8 Q. Did you see any news accounts of the wreck that
9 happened near Detroit on M-10 on November 11 --

10 **A. Yes.**

11 Q. -- 2014?

12 **A. Yes, sir.**

13 Q. That was a month ago?

14 **A. Yes, sir.**

15 Q. That was a Jeep with a rear gas tank; was it not?

16 **A. Yes, sir.**

17 Q. It was hit in the rear, wasn't it?

18 **A. Yes.**

19 Q. It exploded?

20 MS. JEFFREY: Object to form.

21 **A. I'm not sure what happened, sir.**

22 BY MR. BUTLER:

23 Q. Did you see the video clips on the news --

24 **A. No.**

25 Q. -- about it burning?

1 **A. Didn't see the video clips.**

2 Q. That's the wreck in which Cato White (phonetic) was
3 burned to death; was it not?

4 **A. I don't remember her name, sir.**

5 Q. Do you remember how old she was?

6 **A. She was a young pregnant mother. That's all I
7 remember, sir.**

8 Q. Yes, sir. Did that make you wonder about whether
9 putting gas tanks at the rear of these Jeeps was a
10 good idea?

11 MS. JEFFREY: Object to form.

12 **A. No, sir.**

13 BY MR. BUTLER:

14 Q. What languages do you speak, sir?

15 **A. German, English and Italian somewhat, some Spanish.**

16 MR. BUTLER: I believe that's all I've got.
17 Thank you very much.

18 MS. JEFFREY: I'd like to take a
19 five-minute break and I may have some direct.

20 Terry, could you get off the phone so I can
21 give you a call and then call back in?

22 MR. BRANTLEY: Sure.

23 MS. JEFFREY: Thank you.

24 VIDEO TECHNICIAN: 10:52, we are off the
25 record.

1 (Recess taken at 10:52 a.m.)

2 (Back on the record at 11:03 a.m.)

3 VIDEO TECHNICIAN: It's 11:03, we are back
4 on the record.

5 MS. JEFFREY: I have no questions.

6 MR. BUTLER: Thank you, Mr. Estes, that
7 concludes this deposition.

8 MS. JEFFREY: I just --

9 VIDEO TECHNICIAN: The time is 11:03, we
10 are off the record.

11 (Off the video record at 11:03 a.m.)

12 MS. JEFFREY: We'd like to read and sign.

13 MR. BUTLER: On the steno, we have
14 available for Chrysler counsel, we can send them to
15 them, clean copies of these exhibits that we will use
16 that have been highlighted. It's just -- in the
17 interest of time, we just didn't want to delay the
18 deposition by using both clean and highlighted copies,
19 but we have them available. Thank you.

20 (Deposition concluded at 11:04 a.m.

21 Signature of the witness was requested.)

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CERTIFICATE OF NOTARY

STATE OF MICHIGAN)
) SS
COUNTY OF MONROE)

I, LEISA M. PASTOR, certify that this deposition was taken before me on the date hereinbefore set forth; that the foregoing questions and answers were recorded by me stenographically and reduced to computer transcription; that this is a true, full and correct transcript of my stenographic notes so taken; and that I am not related to, nor of counsel to, either party nor interested in the event of this cause.



LEISA M. PASTOR, CSR-3500, CRR,
Notary Public,
Monroe County, Michigan
My Commission expires: 9/7/20

1 TO: Sheila Jeffrey
2 Re: Signature of Deponent Judson Estes
3 Date Errata due back at our offices: 01/12/2015
4

5 Greetings:

6 The deponent has reserved the right to read and sign.
7 Please have the deponent review the attached PDF
8 transcript, noting any changes or corrections on the
9 attached PDF Errata. The deponent may fill out the
10 Errata electronically or print and fill out manually.

11
12 Once the Errata is signed by the deponent and notarized,
13 please mail it to the offices of Tiffany Alley (below).

14
15 When the signed Errata is returned to us, we will seal
16 and forward to the taking attorney to file with the
17 original transcript. We will also send copies of the
18 Errata to all ordering parties.

19
20 If the signed Errata is not returned within the time
21 above, the original transcript may be filed with the
22 court without the signature of the deponent.

23
24 Please send completed Errata to:
25 Tiffany Alley Global Reporting & Video
730 Peachtree St. NE, Ste 470
Atlanta, GA 30308
(770) 343-9696

1 ERRATA

2 I, the undersigned, do hereby certify that I have read the
transcript of my testimony, and that

3
4 ___ There are no changes noted.

5 ___ The following changes are noted:

6
Pursuant to Rule 30(7)(e) of the Federal Rules of Civil
7 Procedure and/or OCGA 9-11-30(e), any changes in form or
substance which you desire to make to your testimony shall
8 be entered upon the deposition with a statement of the
reasons given for making them. To assist you in making any
9 such corrections, please use the form below. If additional
pages are necessary, please furnish same and attach.

10
11 Page _____ Line _____ Change _____

12 _____

13 Reason for change _____

14 Page _____ Line _____ Change _____

15 _____

16 Reason for change _____

17 Page _____ Line _____ Change _____

18 _____

19 Reason for change _____

20 Page _____ Line _____ Change _____

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22 Reason for change _____

23 Page _____ Line _____ Change _____

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25 Reason for change _____

1 Page _____ Line _____ Change _____

2 _____

3 Reason for change _____

4 Page _____ Line _____ Change _____

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6 Reason for change _____

7 Page _____ Line _____ Change _____

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9 Reason for change _____

10 Page _____ Line _____ Change _____

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12 Reason for change _____

13 Page _____ Line _____ Change _____

14 _____

15 Reason for change _____

16 Page _____ Line _____ Change _____

17 _____

18 Reason for change _____

19 _____

20 _____

DEPONENT'S SIGNATURE

21

Sworn to and subscribed before me this ____ day of

22 _____, _____.

23

24 NOTARY PUBLIC

25 My Commission Expires: _____

| | | | |
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