# Safety Research Report Index - GM X-Car Rear Brake Lockup

# A. BACKGROUND

- "X-Car Brakes," <u>Automobile Design Liability</u>, 2nd Edition,(Lawyers Co-operative Publishing Co.), Cumulative Supplement, December 1985
- 2. "Apparent Brake Flaw Reported: Tested Cars, Okay WithFull Load, Slue in Panic Stops," <u>Washington Star</u>, 5/11/79
- 3. "For Want of a Hand Brake," <u>Car and Driver</u>, Oct. 1979
- 4. <u>New York Times</u> articles on GM recall of 1980 X-cars, GM tests and government's lawsuit,  $\frac{1}{5}/83$ ,  $\frac{2}{10}/83$ ,  $\frac{3}{2}/83$ ,  $\frac{3}$
- 5. "X-Car: Anatomy of a brake lock-up," <u>Detroit Free Press</u>, 5/27/83
- 6. Jack Anderson columns on GM X-car, 7/2/83, 10/22/83
- 7. "Test drivers reported X-car problem -- GM launchedoutput despite brake lock-up," <u>Detroit Free</u> <u>Press</u>, 9/28/83
- 8. "Released GM Papers Show X-C ar's Brakes W ere a ConcernBefore Production Began, <u>Wall Street</u> Journal, 10/21/83
- 9. "GM Sued for \$1 Billion on X-cars," <u>The Washington Post</u>, 3/22/84
- 10. "Six GM executives sued on X-cars," <u>Automotive News</u>,5/7/84
- ll. "GM To Engineers: Keep Opinions Out of Memos," Ward'sAuto World, October 1984

# **B.** ATTORNEYS

### C. EXPERTS

#### **D. LAWSUITS**

- 1. "Jury favors crash victim in X-car case," <u>Detroit FreePress</u>, 12/9/83
- 2. Complaint in the class action <u>Alberti, et al. v. GeneralMotors Corp.</u>, 1984
- 3. <u>Alberti v. GM</u> (now <u>Barbarin v. GM</u>), 600 F. Supp. 1026(D.D.C. 1985) (Memorandum and Order Denying GM Motion toDismiss)

### **E. INTERNAL DOCUMENTS**

- 1. 44 selected GM internal memos on X-car brake lock-up
- 2. Index to over 100,000 GM internal memos submitted toNHTSA prior to U.S. v. GM
- 3. GM response to interrogatories in <u>U.S. v. GM</u>, Dec. 1983
- 4. Notice regarding availability of GM employee depositionstaken by NHTSA in 1983

# F. DEPARTMENT OF TRANSPORTATION DOCUMENTS

# I. 1980-83 (Investigation Stage)

- 1. National Highway Traffic Safety Administration (NHTSA) toGM, information request, 5/27/80
- 2. Memo to NHTSA Enforcement from NHTSA Research &Development, 6/20/80; includes attachment of GM to NHTSAR&D letter, 5/16/80

- 3. GM to NHTSA, response to 5/27/80 letter, 7/21/80
- 4. NHTSA to GM, information request, 1/2/81
- 5. NHTSA to GM, information request, 3/4/81
- 6. GM to NHTSA, response to  $\frac{1}{2}/81$  letter,  $\frac{3}{11}/81$
- 7. NHTSA memo (handwritten) regarding call from GM on change in rear brake lining for 1981 X-cars, 4/9/81
- 8. GM to NHTSA, response to 3/4/81 letter, 5/5/81
- 9. NHTSA memo on meeting with GM, 6/10/81
- 10. NHTSA Engineering Analysis Final Report, 6/26/81
- 11. NHTSA to GM, request for recall, 7/6/81
- 12. GM to NHTSA, response to 7/6/81 letter, 7/8/81
- 13. NHTSA preliminary test results (engineer's handwrittennotes), 7/9/81
- 14. GM Recall Campaign 81V-095 and Pontiac letter to zoneoffices on policy for replacing rear brake linings ifrecall fails to eliminate lock-up complaints, Aug. 1981
- 15. NHTSA, Final Test Report, June 1982
- 16. NHTSA memo on meeting with GM, 9/28/82
- 17. Center for Auto Safety (CAS) to NHTSA, petition to expandinvestigation and recall, 10/15/82; NHTSA to CAS,granting expansion of case to 1981-83 X-cars, 12/8/82
- 18. NHTSA to GM, information request, 12/17/82
- 19. NHTSA Peer Group Complaint Analysis, 1/6/83
- 20. NHTSA Phase I Investigative Report, Jan. 1983
- 21. NHTSA to GM, advising of initial defect determination,1/14/83; NHTSA news release on same, 1/14/83
- 22. GM to NHTSA, response to 12/17/82 letter, includingAttachments F (lawsuits) and H (parking brake changes),1/31/83
- 23. GM to NHTSA, further reply to 12/17/82 letter, 2/9/83
- 24. GM to NHTSA, further reply to 12/17/82 letter, 2/11/83
- 25. NHT SA news release, "NHTSA and General Motors Working OutDetails For X-Body Recall," 2/18/83
- 26. NHTSA to GM, Special Order and Document Request, 3/4/83;Modification to Order, 3/9/83
- 27. GM to NHTSA, response to 3/9/83 Special Order, withselected attachments, 3/25/83
- 28. NHTSA "Minute Memo" to file, list of X-car brake lock-upfatalities reported since initial defect finding, 3/25/83
- 29. GM to NHTSA, material from 1983 recall, 3/18/83

#### II. 1983-85 (Litigation Stage)

1. <u>U.S. v. General Motors Corporation</u>, Complaint filed inU.S. District Court for District of Columbia, C.A. #83-2220, 8/3/83

- 2. CAS to NHTSA, petition to investigate and recallaftermarket brake linings sold for use on X-cars,8/29/83, with a ttachments
- 3. <u>U.S. v. GM</u>, government's Motion for Summary Judgment, 9/13/83
- 4. CAS to NHTSA, petition for recall of 1981-83 X-cars and 1982-83 A and J-cars, including attachment Q (servicebulletin on caliper pin corrosion), 11/14/83
- 5. U.S.v. GM, GM's Motion for Summary Judgment, 11/30/83; Statement of Material Facts, 12/5/83
- 6. CAS to NHTSA, letter regarding delays in investigation of 1981-83 X-cars, 4/27/84
- 7. CAS to NHTSA, request investigation be expanded to include 1984-85 X-cars; NHTSA to CAS, request granted, 3/22/85

# G. CENTER FOR AUTO SAFETY

1. Center for Auto Safety consumer advisory warning 1981-83 GMX-car owners of rear brake lock-up, 4/27/84

### **H. CONGRESS**

- 1. Congressional Hearings, 3/2/83 and 8/5/83, selected materials
- 2. CAS testimony before House Subcommittee onTelecommunications, Consumer Affairs and Finance, hearingon X-car case, 3/2/85
- 3. "Department of Transportation's Investigation of RearBrake Lockup Problems in 1980 X-Body Cars Should HaveBeen More Timely," General Accounting Office report, 8/5/83

#### I. TECHNICAL MATERIALS

- 1. European brake standard (portion)
- 2. Accident reconstruction report, William Haskett X-carfatality, A. Dahle, 9/l8/81
- 3. "Vehicle Braking, Stability and Control," Society of Automotive Engineers paper, March 1983
- 4. Paper by J.E. Davidson, automotive consultant, regardingX-car's use of duo-servo rear drum brakes, August 1983
- 5. "Editor's Report," Motor, regarding aftermarket liningsfor X-cars, Aug. 1983
- 6. J.E. Davidson to NHTSA regarding proportioner calibrationand front brake degradation, 3/30/84
- 7. Test results, Ministry of Transport, Canada, 1981 X-car, 1981-83