

Deposition of Edward C. Ivey, Engineer - GM Advanced Design Group
December 9, 1994

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1 THE UNITED STATES DISTRICT COURT
2 FOR THE DISTRICT OF SOUTH CAROLINA
3 COLUMBIA DIVISION

4 MARK D. CAMERON, et al.,

5 Plaintiffs,

Civil Action No.:
3:93-1278-07

6 v.

7 GENERAL MOTORS CORPORATION,

8 Defendant.

9 VIDEOTAPE DEPOSITION OF EDWARD C. IVEY

10 Taken on December 9, 1994, at

11 800 Michigan National Tower,

12 Lansing, Michigan, at or about 9:25 a.m.

13 APPEARANCES:

14 For the Plaintiffs:

15 MR. JAMES E. BUTLER
16 Butler, Wooten, Overby & Cheeley
17 1500 Second Avenue
18 P. O. Box 2766
Columbus, Georgia 31902

19 For the Defendant:

20 MR. JAMES P. FEENEY
21 Feeney Kellett & Wierner, P.C.
22 Third Floor
23 950 Hunter Boulevard
24 Bloomfield Hills, Michigan 48304-3927

25 MR. ROBERT H. BRUNSON
Nelson, Mullins, Riley & Scarborough
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400 Colony Square
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Atlanta, Georgia 30361

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1 conclusion inapplicable to trucks. Do you know of
2 anything so different about trucks?

3 A Well, the body structure that -- in a truck and the
4 frame structure and everything that's back there
5 and the amount of motion of the suspension and the
6 type of axles that are used, all those things --
7 and the amount of rear overhang that's on a truck,

8 all those things could say that that's maybe not
9 the best place to put it on a truck. There are
10 other places you can put it on a truck.

11 Q Can you name a worse place to put a fuel tank than
12 outside the frame rail on the side?

13 MR. FEENEY: Object to form and
14 foundation.

15 THE WITNESS: Well, yes. You could --
16 you could put it on the front bumper.

17 BY MR. BUTLER, CONTINUING:

18 Q Has anybody ever put a fuel tank on a front bumper,
19 well, since the teens or early twenties?

20 A Not that I know of.

21 Q All right. Let's leave that one out. Can you name
22 another place that would be a worse place to put a
23 fuel tank than outside the frames rails on the
24 side?

25 MR. FEENEY: Object to form and

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8 all those things could say that that's maybe not
9 the best place to put it on a truck. There are
10 other places you can put it on a truck.

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