

In The Matter Of:
Walden vs. Chrysler

Michael Teets

January 22, 2015

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TIFFANYALLEY
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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 MICHAEL RICHARD TEETS,
Taken at 2501 Worldgateway Place,
Romulus, Michigan,
Commencing at 9:02 a.m.,
Thursday, January 22, 2015,
Before Leisa M. Pastor, CSR-3500, RPR, CRR.

.

1 APPEARANCES :

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25

1 ALSO PRESENT :

2 Beth N. Glen

3 Kate Dondero

4 Ben Solorzano - Video Technician

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1 Romulus, Michigan

2 Thursday, January 22, 2015

3 9:02 a.m.

4

5 MR. BUTLER, JR.: On the steno record, is
6 Ms. Owens on the phone?

7 MS. JEFFREY: Yes, she is.

8 MR. BUTLER, JR.: Okay. For the steno
9 record, Ms. Owens sent an e-mail yesterday saying that
10 she was going to be on the telephone to monitor the
11 deposition.

12 MR. BUTLER: All right. We ready to go?
13 Here on behalf of Brian Walden and Lindsay Strickland,
14 the wrongful death claim of Jeb Butler, here with Jim
15 Butler and Dave Rohwedder, also paralegals Kate
16 Dondero and Beth Glen.

17 MS. JEFFREY: I'm Sheila Jeffrey from
18 Miller Canfield here for Chrysler Group and the
19 witness, Mike Teets, and with me is Alan DeGraw,
20 in-house counsel for Chrysler Group, and on the phone
21 is Diane Owens, Georgia counsel for Chrysler Group.

22 MR. BUTLER: All right. Let's go on video.

23 VIDEO TECHNICIAN: We are now on the video
24 record. This is the videotaped deposition of Michael
25 Teets being taken on Thursday, January 22nd, 2015.

1 The time is now 9:01 a.m. We are located at 2501
2 Worldgateway Place, Romulus, Michigan. We are here in
3 the matter of James Bryan Walden, et al., versus
4 Chrysler Group, L.L.C., et al. This is Case No.
5 12-CV-472. This matter is being held in the Superior
6 Court of Decatur County, State of Georgia.

7 My name is Ben Solorzano, video technician.
8 Will the court reporter please swear in the witness.

9 MICHAEL RICHARD TEETS,
10 was thereupon called as a witness herein, and after
11 having first been duly sworn to testify to the truth,
12 the whole truth and nothing but the truth, was
13 examined and testified as follows:

14 MR. BUTLER: This would be the video
15 deposition of Michael Teets taken pursuant to notice
16 under the Georgia Civil Practice Act for all purposes
17 permitted by the Georgia Civil Practice Act including
18 use at trial. It will be taken upon
19 cross-examination.

20 EXAMINATION

21 BY MR. BUTLER:

22 Q. Would you please introduce yourself to the jury?

23 A. **Michael Richard Teets.**

24 Q. Where do you live?

25 A. **In Grosse Pointe Park, Michigan.**

1 Q. And we're here basically in Detroit, Michigan today;
2 is that correct?

3 **A. Correct.**

4 Q. That's very close to where you live, isn't it?

5 **A. Yes.**

6 Q. You have been at Chrysler since 1981; is that right?

7 **A. That's right.**

8 Q. That's about 34 years?

9 **A. Yes.**

10 Q. Isn't it true that for all those 34 years you have
11 been involved in fuel systems design?

12 **A. That's true.**

13 Q. What is your current job title?

14 **A. Senior engineer.**

15 Q. At one point in your career you were a project
16 engineer responsible for coordinating entire fuel
17 systems; is that correct?

18 **A. That's correct.**

19 Q. And at one point in your career you were a supervisor
20 over multiple vehicle lines for, quote, Jeep and truck
21 engineering, end quote; is that correct?

22 **A. That's correct.**

23 Q. You are now a senior engineer and I believe a
24 specialist in fuel systems; is that right?

25 **A. That's correct.**

1 Q. Throughout your career you have always been involved
2 with fuel systems; is that right?

3 **A. That's correct.**

4 Q. That was true when you worked for the company then
5 known as Chrysler Corporation, and DaimlerChrysler,
6 and Chrysler, L.L.C., and Chrysler Group, L.L.C., and
7 Fiat Chrysler automobiles, right?

8 **A. That's correct.**

9 Q. You were a fuel systems engineer for this company
10 before the 2009 bailout, right?

11 **A. Correct.**

12 Q. And you were a fuel systems engineer for this company
13 after the 2009 bailout?

14 **A. Correct.**

15 Q. You have testified that you were an expert in fuel
16 systems?

17 **A. I have.**

18 Q. Did you meet with Chrysler's lawyers before this
19 deposition?

20 **A. Yes, I did.**

21 Q. Did they tell you that -- strike that.

22 Did they tell you that they represented not
23 only Fiat Chrysler automobiles, or FCA, but also you
24 personally?

25 MS. JEFFREY: I'm objecting to that and

1 directing him not to answer. He's not going to
2 testify about what I talked to him about during dep
3 prep sessions, that's privileged.

4 MR. BUTLER: Do you contend it's a fact
5 that he is or is not your client is privileged?

6 MS. JEFFREY: I stated on the record that
7 I'm representing him and Chrysler Group, and you asked
8 him what we told him, and I'm not going to let him
9 testify about what we told him.

10 BY MR. BUTLER:

11 Q. Well, let me ask you this, Mr. Teets. Do you
12 understand that Sheila Jeffrey and the other Chrysler
13 lawyers represent not only FCA but also you
14 personally?

15 **A. Yes.**

16 Q. Are you paying them to represent you personally or is
17 FCA paying for that?

18 **A. I am not paying that.**

19 Q. Is FCA paying for that?

20 **A. I -- I assume so.**

21 Q. With whom did you meet, what specific lawyers?

22 **A. I met with Sheila Jeffrey and Alan DeGraw.**

23 Q. Was anyone else there, whether in person or on the
24 telephone?

25 **A. Brian Westenberg was there, and I forget the attorney**

1 **on the telephone.**

2 Q. So we have Sheila Jeffrey, who's seated in this room,
3 Alan DeGraw, who's in this room, Brian Westenberg, who
4 is not here, and some other lawyer whose name you
5 don't recall who is not here?

6 **A. Correct.**

7 Q. How long did you all meet for?

8 **A. A couple hours.**

9 Q. Where?

10 **A. At the Chrysler headquarters.**

11 Q. Is that in Auburn Hills?

12 **A. Yes.**

13 Q. That's also very close to where we are here?

14 **A. Yes.**

15 Q. Did you review any documents?

16 **A. Yes.**

17 Q. Which ones?

18 **A. Some of the standards and guidelines.**

19 Q. Which standards and guidelines?

20 **A. Fuel systems guidelines and I believe there was some**
21 **standards in there I looked at.**

22 Q. Did you review the fuel system design guidelines
23 copyrighted in 1999, I think written by Mark Olex,
24 that you were a reviewer of?

25 **A. I did.**

1 Q. Did you review any other documents?

2 **A. I reviewed some previous depositions that I did.**

3 Q. Which ones?

4 **A. I think it was Hazleton (ph.), I reviewed**
5 **Dionne's (ph.) and Rowe (ph.).**

6 Q. Are all of those Jeep SUV cases?

7 **A. I believe so.**

8 Q. Did you review the transcript of your deposition in
9 Kline against Chrysler?

10 **A. I did not.**

11 Q. Do you recall that it's also being a Jeep SUV case?

12 **A. Yes.**

13 Q. That's one where a mother named Susan Kline burned up
14 in her Jeep --

15 MS. JEFFREY: Object.

16 BY MR. BUTLER:

17 Q. -- isn't that correct?

18 MS. JEFFREY: Object to form.

19 **A. I don't recall the details.**

20 BY MR. BUTLER:

21 Q. You don't recall who burned in that one?

22 **A. I do not.**

23 Q. How many times have you testified in cases about Jeep
24 SUVs?

25 **A. I believe it's four.**

1 Q. And every one of those Jeep SUV cases was a fire case;
2 isn't that correct?

3 **A. Yes.**

4 Q. That means the Jeep caught fire, that's what we mean
5 when we say a fire case, right?

6 **A. I believe so.**

7 Q. Some of those fires caused injuries by burning people;
8 isn't that true?

9 **A. I believe so.**

10 Q. In some of those cases people died?

11 **A. Yes.**

12 Q. Now, there were some Jeeps, for instance, the 1999
13 Grand Cherokee, that had a gas tank loaded behind the
14 rear axle, right?

15 **A. Yes.**

16 Q. And there were other Jeeps that had the gas tank
17 located forward of the rear axle in what's called the
18 midship location; is that correct?

19 **A. Some Jeeps have the fuel tank there, yes.**

20 Q. That's called the midship location?

21 **A. Correct.**

22 Q. Isn't it true that in every Jeep fire case you have
23 ever testified in, the Jeep that had caught fire had a
24 rear tank?

25 **A. Yes.**

1 Q. Isn't it true that you have never testified in any
2 Jeep SUV case where a Jeep with a midship tank caught
3 fire?

4 **A. I have not.**

5 Q. So you've testified in I think we said four cases
6 where a Jeep -- with a rear tank caught fire?

7 **A. Correct.**

8 Q. And zero where a Jeep with a midship tank caught fire?

9 **A. Correct.**

10 Q. Did you ever tell anyone at Chrysler that these Jeeps
11 with rear tanks might be dangerous?

12 **A. No.**

13 Q. Well, did anyone at Chrysler ever tell you that these
14 Jeeps with the rear tanks might be dangerous?

15 **A. No.**

16 Q. In how many of those cases where the Jeeps with rear
17 fires (sic) caught fire -- strike that.

18 In how many of those cases where those
19 Jeeps with rear tanks caught fire did you go to trial
20 and testify in front of a jury and how many did
21 Chrysler settle out of court?

22 **A. I never went to a trial jury.**

23 Q. You've never testified in front of a jury?

24 **A. I have not.**

25 Q. Have you ever told the public or has Chrysler ever

1 told the public that you are repeatedly called upon to
2 testify in cases where rear tank Jeeps catch fire but
3 have never been called to testify in a case where a
4 Jeep with a midship tank caught fire?

5 MS. JEFFREY: Object to form.

6 **A. I have not.**

7 BY MR. BUTLER:

8 Q. Has anyone to your knowledge told the public that?

9 **A. No.**

10 Q. Isn't it true that Chrysler is trying to avoid drawing
11 public attention to these rear tank Jeep fires like
12 the case you're testifying in here today?

13 **A. I don't believe so.**

14 Q. Isn't it true, sir, that the first rule of fuel system
15 design is to put the gas tank where it will not get
16 hit in a foreseeable collision?

17 MS. JEFFREY: Object to form.

18 **A. That is not true.**

19 BY MR. BUTLER:

20 Q. Well, do you think that the gas tank should be put
21 where it's going to be hit in a foreseeable collision?

22 **A. The first rule, if you would, there is no true first
23 rule. When a vehicle is being designed in the early
24 stages in advance vehicle engineering, they take into
25 account the entire vehicle bumper to bumper. Every**

1 **design parameter is considered early in the design**
2 **phase.**

3 MR. BUTLER: Move to strike as entirely
4 nonresponsive.

5 Madam Court Reporter, would you please read
6 back my question?

7 COURT REPORTER: Uh-huh.

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

11 Q. Well, do you think that the gas tanks
12 should be put where it's going to be hit in
13 a foreseeable collision?)

14 **A. As I said, there's an infinite amount of collisions**
15 **and an infinite amount of potential crash zones and**
16 **crash scenarios. The vehicle's packaged from bumper**
17 **to bumper and the fuel tank is placed in the**
18 **appropriate area for the package.**

19 BY MR. BUTLER:

20 Q. Sir, that still does not answer the question. The
21 question was do you believe that a gas tank should be
22 placed where it will be struck in a foreseeable
23 collision?

24 MS. JEFFREY: He's answered it twice, but
25 he can answer it again.

1 **A. There's an infinite amount of collisions.**

2 BY MR. BUTLER:

3 Q. Are you willing to tell this jury whether you believe
4 that a gas tank should be put where it will be struck
5 in a foreseeable collision? Look at the camera and
6 tell the jury whether you'll answer that question and
7 what the answer is?

8 **A. There is an infinite amount of collision scenarios,**
9 **speeds, infinite amount of angles in**
10 **vehicle-to-vehicle collisions. There is no**
11 **foreseeable collision zone.**

12 Q. Well, let me ask you this: Isn't it true that
13 rear-end collisions are foreseeable?

14 **A. As much as front and side collisions, yes.**

15 Q. Isn't it true that rear-end collisions with underride
16 are foreseeable?

17 **A. There's underride in any potential angle of attack,**
18 **yes.**

19 Q. The answer to that question is yes, isn't it?

20 **A. I said yes.**

21 Q. Okay. Now, you know what underride is, that's when
22 the front of one vehicle goes underneath the rear of
23 another, correct?

24 **A. Underride is where one vehicle goes underneath another**
25 **vehicle in any direction.**

1 Q. And a rear-end collision with underride is where the
2 front of one vehicle goes underneath the rear of
3 another, correct?

4 **A. If it's a rear collision it would be the rear front of**
5 **one under the rear of another. If it's a front**
6 **collision it will be the front of one under the front**
7 **of another.**

8 MR. BUTLER: Move to strike the second part
9 of that as nonresponsive.

10 BY MR. BUTLER:

11 Q. Are you aware that this case, Walden against Chrysler,
12 is about a rear-end collision with underride?

13 **A. I don't know whether it's a rear-end collision.**

14 Q. You're not aware that Chrysler's own witness, Steve
15 Fenton, has testified that there was underride in this
16 collision?

17 **A. I'm not aware of that.**

18 Q. Did you ask?

19 **A. I did not.**

20 PRE-MARKED FOR IDENTIFICATION:

21 DEPOSITION EXHIBIT 17

22 10:14 a.m.

23 BY MR. BUTLER:

24 Q. I'm going to show you what's been marked as
25 Plaintiffs' Exhibit 17. This document is the one that

1 you reviewed before this deposition, isn't it?

2 **A. This is one of them, yes.**

3 Q. Isn't it true that -- well, this is design guidelines
4 for fuel supply, correct?

5 **A. Yes.**

6 Q. It was copyrighted in 1999, correct?

7 **A. Excuse me. Correct.**

8 Q. The author of it is Mark Olex, correct?

9 **A. Yes.**

10 Q. And you were one of the section reviewers?

11 **A. Correct.**

12 Q. Doesn't it say down here on number 2 under basic
13 configuration, quote, the tank should be located in a
14 manner that avoids known impact areas and provides
15 isolation from the passenger compartment; did I read
16 that correctly?

17 **A. Yes, you did.**

18 Q. You're familiar with that rule, aren't you?

19 **A. Yes, I am.**

20 Q. You were familiar with it even before you talked about
21 it with Chrysler's lawyers and your lawyers in advance
22 of this deposition?

23 **A. Correct.**

24 Q. Isn't it true that the 1999 Grand Cherokee violated
25 that basic rule that the gas tank should not be

1 located in a, quote, known impact area?

2 **A. No, that is not true.**

3 PRE-MARKED FOR IDENTIFICATION:

4 DEPOSITION EXHIBIT 85

5 10:15 a.m.

6 BY MR. BUTLER:

7 Q. Well, I'm going to show you another document. This is
8 a picture marked Plaintiffs' Exhibit Number 85, and I
9 will represent to you this is a picture of a 1999
10 Grand Cherokee with a gas tank location wrapped in red
11 plastic. Now hold that picture up for the camera, if
12 you will? And please tell the jury whether it is your
13 testimony that that red tank is not in a known impact
14 area for a rear-end collision with underride?

15 **A. During underriding, as I understand it, I'm not a**
16 **reconstructionist, but the oncoming vehicle will**
17 **strike the structure of the vehicle that it is about**
18 **to hit, so there will be structure around the tank as**
19 **is structure around this tank, and the guidelines as**
20 **it was written, as I understand it, they were written**
21 **before I hired in to Chrysler, 1981, and that exact**
22 **statement was there going back through the '70s.**

23 Where that statement originated from was
24 when the FMVSS 301 was originally published in the mid
25 '70s, from what I understand, this is what I was told

1 when I hired in or shortly after, that known impact
2 areas is considered the outside of the structure,
3 the -- we used to put fuel tanks -- we, Chrysler, in
4 the '60s and '70s, in the rear quarter panels of
5 station wagons and there's no structure to protect the
6 tank, it's just sheet metal skin, and that -- and
7 there was also fuel tanks in the passenger compartment
8 zone.

9 MR. BUTLER: Move to strike that answer as
10 entirely nonresponsive.

11 BY MR. BUTLER:

12 Q. My question, sir, is based on the photograph that's in
13 front of you that's labeled Plaintiffs' Exhibit Number
14 85 -- hang on a second, I've dropped my mike. I'm
15 going to move my cord so I can avoid that. Get that
16 out of here.

17 My question, sir, is this: Based on the
18 picture that's in front of you and that's marked as
19 Plaintiffs' Exhibit 85, isn't it true that in a
20 foreseeable rear-end collision with underride there's
21 nothing to get hit except that red gas tank?

22 MS. JEFFREY: Object to form.

23 A. No, that is not true. There's structure all around
24 the gas tank, there's cross members, there's
25 longitudinal and side-to-side cross members.

1 MR. BUTLER: Move to strike everything
2 after there's structure as nonresponsive.

3 BY MR. BUTLER:

4 Q. Isn't it true that in this picture we can see the gas
5 tank location even underneath the little plastic
6 fascia that's on the back of the Grand Cherokee?

7 **A. That's true, you can see it from this camera angle.**

8 Q. Now, the reason you want to avoid putting a gas tank
9 in known impact areas is obvious, isn't it?

10 MS. JEFFREY: Object to form.

11 **A. I don't understand the question.**

12 BY MR. BUTLER:

13 Q. What is the reason -- well, strike that.

14 The reason you don't want to avoid (sic)
15 putting a gas tank in a known impact area is to
16 prevent the tank from getting crushed; isn't that
17 correct?

18 MS. JEFFREY: Object to form.

19 **A. What you want to do is have structure and support**
20 **around the tank. There's an infinite amount of --**
21 **every area of the vehicle can be impacted, so you**
22 **protect the tank.**

23 MR. BUTLER: Move to strike as entirely
24 nonresponsive.

25 Would you please read my question back?

1 COURT REPORTER: Uh-huh.

2 (The following requested portion of the
3 record was read by the reporter at
4 10:19 a.m.):

5 Q. What is the reason -- well, strike
6 that.

7 The reason you don't want to avoid (sic)
8 putting a gas tank in a known impact
9 area is to prevent the tank from getting
10 crushed; isn't that correct?)

11 BY MR. BUTLER:

12 Q. It appears that I misspoke my question, so let me do
13 it again.

14 Isn't it true that the reason you want to
15 avoid putting a gas tank in a known impact area is
16 because if you put it in a known impact area it's
17 going to get crushed?

18 **A. If there's no structure around the tank in the known
19 impact area, as I mentioned earlier, in the quarter
20 panel or outside of the structure frame rails of a
21 car, the potential to get crush is far greater, yes.**

22 Q. The truth is if you put a tank in a known impact area,
23 it's known that the tank's going to get crushed; isn't
24 that right?

25 **A. As I said, in a crush zone outside of the frame rails,**

1 **outside a structure, during an impact the tank would**
2 **be crushed, that's where the guidelines depicted**
3 **saying keep it out of known impact areas.**

4 Q. A tank in a crush zone is going to get crushed; isn't
5 that right?

6 **A. Without structure around it the tank in the crush zone**
7 **will get crushed.**

8 Q. The rule is, sir, that there should be no crush in the
9 tank area; isn't that correct?

10 MS. JEFFREY: Object to form.

11 **A. That is not correct.**

12 MARKED FOR IDENTIFICATION:

13 DEPOSITION EXHIBIT 5-A

14 10:20 a.m.

15 BY MR. BUTLER:

16 Q. Well, let me show you a document marked as Plaintiffs'
17 Exhibit 5-A. This is a document from the, quote, rear
18 impact tech club; is that right?

19 **A. Correct.**

20 Q. And it says down here, it has a number 4 and it has
21 your name next to that, right?

22 **A. Correct.**

23 Q. That number 4 says review on fuel system guidelines
24 and methodology?

25 **A. Correct.**

1 Q. And it says -- the second bullet under that says,
2 quote, determining the crush zone, should be no crush
3 in tank area; did I read that correctly?

4 **A. That is correct.**

5 Q. Isn't it true that there's another rule that the gas
6 tank should not hit the rear axle?

7 **A. No, this statement, and I gave a presentation to this
8 fact, was in preparation for the upcoming rewrite of
9 FMVSS 301, which is another crash scenario.**

10 Q. Sir, that's not responsive at all. I'm not even
11 asking you about that document now. My question was
12 isn't there another rule that the gas tank should not
13 strike the rear axle?

14 MS. JEFFREY: Object to form.

15 **A. There is no rule that the gas tank should not strike
16 the rear axle, or there is no rule that it cannot be
17 in a deformation area.**

18 BY MR. BUTLER:

19 Q. Chrysler thinks it's okay to put the gas tank in a
20 crush zone?

21 **A. There is an allowable deformation zone within a car --**

22 Q. Chrysler --

23 **A. -- where the gas tank is.**

24 Q. Is it your testimony that it -- Chrysler thinks it is
25 okay to put the gas -- strike that.

1 Is it your testimony that Chrysler thinks
2 it is okay to put the gas tank in a crush zone where
3 it will be deformed?

4 **A. During impact, when the vehicle is being crushed there**
5 **are zones on the car that is allowable some level of**
6 **deformation. The tank is designed to absorb that**
7 **energy, the structure absorbs the main energy coming**
8 **in from the vehicle. The tank can absorb some energy**
9 **and be, if you would, slightly compressed. It's a**
10 **moveable object, if you would.**

11 MR. BUTLER: Move to strike as
12 nonresponsive.

13 BY MR. BUTLER:

14 Q. Is it your testimony that Chrysler thinks it is okay
15 for the gas tank to get deformed in a foreseeable
16 collision?

17 **A. During a collision, the crush zone, if a gas tank is**
18 **in a zone that has some deformation, that is**
19 **acceptable.**

20 Q. Isn't it true there is a rule that the gas tank should
21 not hit the rear axle?

22 MS. JEFFREY: Object to form.

23 **A. I'm not aware of any rule that the gas tank should not**
24 **hit the rear axle.**

25 BY MR. BUTLER:

1 Q. Please turn to Plaintiffs' Exhibit 17, which I think
2 is in front of you, that's the fuel design guidelines
3 for fuel supply. We've already talked about this
4 document, right?

5 **A. Yes, we have.**

6 Q. Turn to the second page, please, and look at -- you
7 see the heading packaging clearances at the top?

8 **A. Yes, I do.**

9 Q. Look down at number 6 and tell me if I read this
10 correctly. Number 6 has to do with the, quote, axle,
11 bumper, shock, strut and unfriendly surfaces, end
12 quote. Did I read that right?

13 **A. Correct.**

14 Q. And the second sentence says, quote, no contact should
15 occur between these components and the tank during the
16 vehicle impact. Did I read that correctly?

17 MS. JEFFREY: Form.

18 **A. Yes, you did, and I'd like to state, since we're**
19 **talking about unfriendly surfaces, as the next**
20 **sentence, all components must be present with a smooth**
21 **and friendly surface to the tank.**

22 BY MR. BUTLER:

23 Q. Sir, move to strike as nonresponsive everything after
24 the word and. You understand that this is where I ask
25 questions and you give answers to them, don't you?

1 **A. Yes, I'd like to --**

2 Q. Now, you understand that Ms. Jeffrey will have a
3 chance to ask you questions after I'm done if she
4 thinks there's some area that we didn't get into that
5 we need to talk about?

6 **A. Yes.**

7 Q. So answer the questions that I ask, please, instead of
8 the ones you wish I asked; is that clear?

9 **A. I'm trying to explain some of them are just not yes/no**
10 **questions.**

11 Q. If they are yes/no questions, please answer them
12 yes/no; is that clear?

13 **A. Clear.**

14 Q. Isn't it true that Chrysler knew with the Grand
15 Cherokee that in violation of Chrysler's own rule the
16 gas tank would strike the rear axle?

17 **A. I don't believe that to be the case.**

18 PRE-MARKED FOR IDENTIFICATION:

19 DEPOSITION EXHIBIT 87

20 9:25 a.m.

21 BY MR. BUTLER:

22 Q. Well, let me show you another document, this is a
23 document labeled Plaintiffs' Exhibit Number 87, and
24 this looks like a transcript, doesn't it?

25 **A. Yes.**

1 Q. Do you know who Judson Estes is?

2 **A. Yes, I do.**

3 Q. Have you worked with him?

4 **A. Some time ago, yes.**

5 Q. This is in a case called Austin against
6 DaimlerChrysler; is that right?

7 **A. Yes.**

8 Q. Did you testify in this one?

9 **A. I don't believe so.**

10 Q. It's another Jeep fire case, if that jogs your memory;
11 do you remember it?

12 **A. I do not.**

13 Q. Turn with me to the next page, please, which is
14 deposition page 181. I want to read you this
15 testimony then I'll ask if I read it correctly.
16 Starting at line 18 and we'll go to line 24, quote --
17 or question, quote, okay, but again, given your
18 observations and experience in testing Grand
19 Cherokees, you would have expected that there would be
20 contact between the tank and the axle, at least in the
21 test; is that right? Answer, yeah, I would have
22 expected the tank and axle to contact.

23 Did I read that correctly?

24 **A. Yes, you did.**

25 PRE-MARKED FOR IDENTIFICATION:

1 DEPOSITION EXHIBIT 88

2 10:26 a.m.

3 BY MR. BUTLER:

4 Q. I'm going to show you now a different picture. This
5 has been marked as Plaintiffs' Exhibit Number 88, and
6 I'll represent to you this is a picture of the
7 underside of a 1999 Grand Cherokee. Now, that's the
8 gas tank on the top of the picture, right, with the X
9 on it?

10 **A. Correct.**

11 Q. Isn't it obvious, sir, that this gas tank is going to
12 get crushed between the striking vehicle and the rear
13 axle in a rear-end collision?

14 MS. JEFFREY: Object to form.

15 **A. First, that is actually the brush guard or skid plate**
16 **on the gas tank; that is not the gas tank itself.**

17 BY MR. BUTLER:

18 Q. Well, the gas tank is there, isn't it, under that X?

19 **A. It's underneath the metal surrounding it, it's a metal**
20 **skid plate or --**

21 Q. Isn't that metal skid plate one millimeter thick?

22 **A. The crush guard would be one millimeter thick, yes.**

23 Q. Isn't it clear -- isn't -- strike that.

24 Isn't it obvious, sir, that this gas tank
25 location is going to be pinned between the rear axle

1 and the striking vehicle in a rear-end collision?

2 MS. JEFFREY: Object to form.

3 **A. I'm not familiar enough with what rear-end collision**
4 **and the energy that goes in, and if this gas tank hits**
5 **a friendly surface such as the rear axle, there is no**
6 **issue.**

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

9 BY MR. BUTLER:

10 Q. Would you please hold that picture up for the camera
11 so the camera can look at it? And the question is
12 isn't it obvious, sir, that this gas tank location is
13 going to get pinned between the axle and the striking
14 vehicle in a rear-end collision and crushed?

15 MS. JEFFREY: Object to form.

16 **A. No, it is not obvious.**

17 MARKED FOR IDENTIFICATION:

18 DEPOSITION EXHIBIT 89

19 9:28 a.m.

20 BY MR. BUTLER:

21 Q. Well, let me show you a different picture. I'm going
22 to show you what's been marked as Plaintiffs' Exhibit
23 Number 89, and I'll represent to you that this is a
24 photograph of the underside of the 1999 Grand Cherokee
25 in which Remington Walden was killed. Now, looking at

1 this picture, isn't it obvious that in this rear
2 impact the gas tank was pinned between the striking
3 vehicle and the rear axle and crushed?

4 MS. JEFFREY: Object to form.

5 **A. What's obvious is the significant amount of energy and**
6 **deformation in the structure, and the -- it's obvious**
7 **that the skid plate did contact the rear axle. As**
8 **stated earlier, that's a friendly surface.**

9 BY MR. BUTLER:

10 Q. Isn't it obvious that the gas tank was pinned between
11 the striking vehicle and the rear axle and crushed?

12 MS. JEFFREY: Object to form.

13 **A. It's obvious that there's a lot of deformation, it's**
14 **obvious that the skid plate did contact the rear axle.**

15 BY MR. BUTLER:

16 Q. Isn't it obvious that there was a lot of deformation
17 in the gas tank when it was pinned between the rear
18 axle and the striking vehicle and crushed?

19 MS. JEFFREY: Object to form.

20 **A. There's obvious -- there is deformation.**

21 BY MR. BUTLER:

22 Q. And the consequences of that deformation was that
23 there was a fire and Remington Walden burned alive;
24 did you know that?

25 MS. JEFFREY: Object to the form.

1 **A. I did not know that.**

2 MR. BUTLER: Let's go off video for a
3 second, we'll stay on the steno.

4 VIDEO TECHNICIAN: The time is 9:28. We're
5 off the video record.

6 MR. BUTLER: The reason I'm doing that is
7 I'm about to refer back to some of these pictures, I
8 want to make sure you got them up.

9 Okay, let's go back on.

10 VIDEO TECHNICIAN: All right, stand by.

11 The time is 9:28 a.m. We are now on the
12 video record.

13 BY MR. BUTLER:

14 Q. I'm going to ask you some other questions, sir, about
15 gas tank placement, and I want to refer back to a
16 picture we just used, but let's make this clear, I'm
17 looking again at Plaintiffs' Exhibit 88, and we've
18 established that that gas tank shown in Plaintiffs'
19 Exhibit 88 is behind the rear axle and located where
20 that big X is; is that correct?

21 **A. That's correct.**

22 MARKED FOR IDENTIFICATION:

23 DEPOSITION EXHIBIT 90

24 10:31 a.m.

25 BY MR. BUTLER:

1 Q. Now I'm going to show you a different picture, and
2 this has been marked as Plaintiffs' Exhibit Number 90.
3 I'll represent to you this is a picture of the
4 underside of the 1997 Dodge Dakota driven by Brian
5 Harrell in this wreck. Can you identify the gas tank
6 in Plaintiffs' Exhibit 90?

7 **A. The gas tank's in the lower left of the photograph.**

8 Q. Now, looking at this picture, this Plaintiffs' Exhibit
9 90, there are some big brown bars in it. You
10 understand that these big brown bars aren't part of
11 the vehicle itself but they're just part of the lift
12 that's holding the vehicle up? Do you understand what
13 I'm saying?

14 **A. Yes.**

15 Q. Now, this gas tank in Plaintiffs' Exhibit 90 is
16 forward of the rear axle, right?

17 **A. That's correct.**

18 Q. It's what we call a midships tank?

19 **A. Yeah, typical pickup trucks have midship tanks.**

20 MARKED FOR IDENTIFICATION:

21 DEPOSITION EXHIBIT 91

22 10:32 a.m.

23 BY MR. BUTLER:

24 Q. Well, let me show you Plaintiffs' Exhibit Number 91.
25 I'll represent to you that this is a picture of the

1 underside of a 2005 Grand Cherokee. Can you identify
2 the gas tank in this picture?

3 **A. Yes, it's in the lower left quadrant of the**
4 **photograph.**

5 Q. It's forward of the rear axle in the midship location,
6 isn't it?

7 **A. Yes.**

8 Q. Now let's turn back to Plaintiffs' Exhibit Number 89,
9 which is in front of you, and I'll pull it out for
10 you. You can still see -- Plaintiffs' Exhibit 89 is a
11 picture of the Walden Grand Cherokee after it's been
12 hit and deformed; is that correct?

13 **A. Correct.**

14 Q. Now, you can still see the X on the gas tank location,
15 can't you?

16 **A. Yes.**

17 Q. Isn't it clear from Plaintiffs' Exhibit 89 that the
18 crush to the Walden Grand Cherokee was behind the rear
19 axle?

20 MS. JEFFREY: Object to the form.

21 **A. It is not clear, there's deformation and longitudinals**
22 **are buckled. As far as I could tell on this**
23 **photograph, again, it's not a very good photograph,**
24 **but they appear to be buckled forward of the rear axle**
25 **also.**

1 BY MR. BUTLER:

2 Q. Is it your testimony upon looking at Plaintiffs'
3 Exhibit Number 89 that you can't say that the crush is
4 behind the rear axle?

5 **A. I'm saying there's crush both behind and in front of**
6 **the rear axle.**

7 Q. Sir, isn't it true that almost all the significant
8 crush to this vehicle was behind the rear axle?

9 MS. JEFFREY: Object to form and
10 foundation.

11 **A. I would have to look at the data and the reports of**
12 **the crush zones and how much. Typically they're --**
13 **during an FMVSS 301 there's targets put on the vehicle**
14 **so they could be measured. I can't look at a**
15 **photograph and determine how much is in each location.**

16 MR. BUTLER: Move to strike as
17 nonresponsive.

18 BY MR. BUTLER:

19 Q. Is it your testimony, sir, that you cannot upon
20 looking at Plaintiffs' Exhibit 89, which is in front
21 of you now, tell that most of the significant crush is
22 behind the rear axle?

23 MS. JEFFREY: Object to form.

24 **A. I could tell that there's crush both in behind and in**
25 **front. I cannot --**

1 BY MR. BUTLER:

2 Q. Well --

3 **A. -- significantly --**

4 MS. JEFFREY: Wait.

5 **A. -- say if it's -- how much is in each location.**

6 BY MR. BUTLER:

7 Q. You can't tell from 89 whether most of the crush is
8 behind or in front of the rear axle?

9 **A. I don't want to guess, and I don't have the data, so I
10 can't say how much is in each location.**

11 MARKED FOR IDENTIFICATION:

12 DEPOSITION EXHIBIT 92

13 9:34 a.m.

14 BY MR. BUTLER:

15 Q. Well, let me show you Plaintiffs' Exhibit Number 92,
16 and this is a combination of two photos we've looked
17 at before. You recognize that, right?

18 **A. Yes, I do.**

19 Q. I'll represent to you on the left side is the
20 underside of the 1997 Dodge Dakota that Brian Harrell
21 was driving in this wreck, and the right side is the
22 underside of the 1999 Jeep Grand Cherokee that
23 Remington Walden was driving in this wreck. The
24 obvious truth from looking at this exhibit,
25 Plaintiffs' Exhibit Number 92, is that if the gas tank

1 in the Walden Grand Cherokee had been located where
2 the gas tank was located in the 1997 Dodge Dakota
3 driven by Brian Harrell, then the gas tank in the 1999
4 Jeep Grand Cherokee would not have crushed?

5 MS. JEFFREY: Object to form.

6 **A. That is not obvious, one, and it depends on the**
7 **striking vehicle location, speed, angle of attack.**
8 **There's an infinite amount -- if a vehicle came in**
9 **from a different direction there would be a different**
10 **crush.**

11 MR. BUTLER: Move to strike as
12 nonresponsive everything after the word obvious.

13 BY MR. BUTLER:

14 Q. Is it not clear from looking at Plaintiffs' Exhibit 92
15 that the area in the 1999 Jeep Grand Cherokee where
16 the gas tank was located in the 1997 Dodge Dakota
17 remains intact and uncrushed?

18 MS. JEFFREY: Object to form.

19 **A. It's obvious that in this particular crash came in**
20 **from the rear left side, so the rear right side is not**
21 **crushed.**

22 BY MR. BUTLER:

23 Q. The area in the 1999 Jeep Grand Cherokee where the gas
24 tank was located in the 1997 Dodge Dakota remains
25 uncrushed, doesn't it?

1 MS. JEFFREY: Object to form.

2 **A. It's obvious that if you don't hit a vehicle in the**
3 **certain zone there will be no crush in that zone.**

4 BY MR. BUTLER:

5 Q. And there's no crush in the zone where the gas tank
6 was located in the 1997 Dodge Dakota, is there?

7 **A. And this Dakota was in a frontal accident so there was**
8 **no crush toward the rear of the car.**

9 Q. That question was unclear and I'll withdraw it.

10 Well, let's just get to the bottom line and
11 get your view on that. Isn't it obvious from
12 Plaintiffs' Exhibit Number 92 that if the gas tank in
13 the 1999 Jeep Grand Cherokee had been located forward
14 of the rear axle, there would have been no fire?

15 MS. JEFFREY: Object to form.

16 **A. In my view is -- as you design a vehicle and locate**
17 **different components, with the fuel tank being one of**
18 **them, there's an infinite amount of crush in crash**
19 **scenarios. When we package a car, we package and**
20 **design for FMVSS 301. In real-world crashes there's**
21 **an infinite amount of the zones that can be crushed.**

22 BY MR. BUTLER:

23 Q. Sir, those words have nothing to do with the question
24 that I just asked you.

25 Would you please read my question back,

1 Madam Court Reporter?

2 COURT REPORTER: Uh-huh.

3 MR. BUTLER, JR.: Move to strike.

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

6 (The following requested portion of the
7 record was read by the reporter at
8 10:38 a.m.:

9 Q. Well, let's just get to the bottom
10 line and get your view on that. Isn't it
11 obvious from Plaintiffs' Exhibit Number 92
12 that if the gas tank in the 1999 Jeep Grand
13 Cherokee had been located forward of the
14 rear axle, there would have been no fire?)

15 MS. JEFFREY: Same objection.

16 **A. Again, it's not obvious the crush is forward also. I**
17 **don't want to guess on how it would perform forward**
18 **versus rear.**

19 MR. BUTLER: Move to strike as
20 nonresponsive everything after the word obvious.

21 BY MR. BUTLER:

22 Q. Isn't it true, sir, that Chrysler moved the gas tank
23 away from the rear of the Grand Cherokee for the model
24 year 2005 Grand Cherokee?

25 **A. The renewal of the Grand Cherokee that was a WJ when**

1 it went to WK was an all-new vehicle, and so it was
2 repackaged as an all-new vehicle, and yes, it was
3 moved to midship location.

4 MR. BUTLER: Move to strike as
5 nonresponsive everything before the word yes.

6 BY MR. BUTLER:

7 Q. Sir, the question is just this: Isn't it true that in
8 model year 2005 for the Grand Cherokee, Chrysler moved
9 the gas tank away from the rear and forward of the
10 rear axle?

11 MS. JEFFREY: He just answered it.

12 You may answer it again.

13 A. **The renewal of the 2005, it's an all-new vehicle, and**
14 **in that new vehicle it became a midship location.**
15 **It's not the same vehicle.**

16 MR. BUTLER, JR.: No, ma'am, Ms. Jeffry, he
17 just parroted your answer. He's supposed to give his
18 answer, not yours.

19 MR. BUTLER: The last question -- I'll move
20 to strike as nonresponsive and ask one more time.

21 BY MR. BUTLER:

22 Q. It's a real simple question. Isn't it true that in
23 model year 2005 the Grand Cherokee had the gas tank
24 moved away from the rear and forward of the rear axle?

25 A. **It was an all-new vehicle in 2005. It wasn't just --**

1 Q. I didn't ask you whether it was an all-new vehicle; I
2 asked you where the gas tank was. Here's the
3 question: Isn't it true that in model year 2005 the
4 Grand Cherokee had the gas tank moved away from the
5 rear axle -- or strike that.

6 Isn't it true that in model year 2005 the
7 Grand Cherokee had the gas tank mounted forward of the
8 rear axle and away from the rear?

9 **A. The renewal, the new vehicle, yes, it moved. I am**
10 **attempting to say it wasn't the same vehicle that just**
11 **moved, it was a new vehicle.**

12 MR. BUTLER: Move to strike as
13 nonresponsive.

14 BY MR. BUTLER:

15 Q. I am attempting to say and everything following that.
16 You know that the gas tank in the 2005 Grand Cherokee
17 was forward of the rear axle, don't you?

18 **A. As -- I can't --**

19 Q. Sir, that's a yes-or-no question.

20 **A. It was -- in the renewal in a new vehicle it was**
21 **moved. It's not the same vehicle. You're implying**
22 **that we've just moved the tank in the current vehicle**
23 **and that is not the case.**

24 Q. Why do you keep -- move to strike as nonresponsive.

25 Did somebody tell you to use the words

1 renewal over and over again, is that why you're doing
2 that?

3 **A. Absolutely not.**

4 Q. Well, try just answering the question. Don't you know
5 that in the 2005 Grand Cherokee the gas tank was
6 forward of the rear axle in a midship location?

7 **A. The new Grand Cherokee when redesigned went to a
8 midship location.**

9 Q. Is the answer to that question yes?

10 **A. Yes.**

11 Q. Thank you. Now, isn't it true that the reason
12 Chrysler put the gas tank forward of the rear axle was
13 to keep it from getting crushed in rear impact?

14 **A. That is not the case.**

15 Q. Well, isn't the reason that you put a gas tank forward
16 of the rear axle to give it protection from rear
17 impact?

18 **A. No.**

19 PRE-MARKED FOR IDENTIFICATION:

20 DEPOSITION EXHIBIT 93

21 9:41 a.m.

22 BY MR. BUTLER:

23 Q. Well, let me show you Plaintiffs' Exhibit Number 93.

24 This is a vehicle brochure for the 1999 Ram cargo van;
25 is that correct?

1 **A. It appears so.**

2 Q. That would be a Dodge product, correct?

3 **A. Yes.**

4 Q. And Dodge is a -- and Dodge is a Chrysler brand, isn't
5 it?

6 **A. That is correct.**

7 Q. Now, turn with me please to the third page in this
8 Chrysler brochure. You've just passed it. Go back
9 one, right there?

10 **A. Okay.**

11 Q. Now, this says at the sixth line from the bottom right
12 next to the van's tire that, quote, a no-rust
13 polyethylene fuel tank is mounted ahead of the rear
14 axle. Did I read that correctly?

15 **A. Correct.**

16 Q. And the reason that Chrysler mounted the gas tank
17 there was to keep it -- to give it protection in rear
18 impact; isn't that true?

19 MS. JEFFREY: Object to form.

20 **A. That's not true.**

21 BY MR. BUTLER:

22 Q. Well, turn with me, please, to the page marked 8, and
23 you'll find that page number in the bottom left corner
24 of the page. And read with me as I read this part on
25 the left side of the page about halfway up, doesn't it

1 say, quote -- quote, midship, end quote, fuel tank is
2 mounted ahead of the rear axle for protection, end
3 quote? Did I read that correctly?

4 **A. You did.**

5 Q. Now, isn't it true that in a four-door Jeep where
6 people might put their families, having a safe gas
7 tank is even more important than it is in a cargo van
8 like the one depicted in the brochure we were just
9 looking at?

10 MS. JEFFREY: Object to form.

11 **A. The brochure -- I'm not sure of the sale brochure and**
12 **the originator of it, but I was involved in this fuel**
13 **system, and it had to do with the overall vehicle**
14 **package, spare tire and mounting equipment, so I'm not**
15 **sure whether the statement midship --**

16 MR. BUTLER: I'll move to strike as
17 nonresponsive --

18 **THE WITNESS: Okay.**

19 MR. BUTLER: -- as not one of those words
20 has anything to do with the question that I asked.

21 BY MR. BUTLER:

22 Q. The question is: Don't you agree that in a four-door
23 vehicle like a Jeep Grand Cherokee where people might
24 put their families, having a safe gas tank location is
25 even more important than it is in a, quote, cargo van,

1 end quote?

2 MS. JEFFREY: Object to form.

3 **A. I think a location alone is not necessarily a**
4 **parameter to have a safe vehicle or safe fuel system**
5 **and --**

6 BY MR. BUTLER:

7 Q. Isn't it true, sir --

8 **A. -- it's just as important to have a safe van as it is**
9 **to have a safe Grand Cherokee.**

10 Q. Will you not agree that in a vehicle where people put
11 their families, safety is even more important than it
12 is in a cargo van?

13 MS. JEFFREY: Object to form.

14 **A. No.**

15 BY MR. BUTLER:

16 Q. Well, let's look at the next exhibit, which is going
17 to be Plaintiffs' Number 94.

18 PRE-MARKED FOR IDENTIFICATION:

19 DEPOSITION EXHIBIT 94

20 10:44 a.m.

21 BY MR. BUTLER:

22 Q. Now, this is a brochure -- or excerpts of a brochure
23 for a 1996 Dodge Caravan; isn't that right?

24 **A. It appears so.**

25 Q. This is another Chrysler product, isn't it?

1 **A. Yes.**

2 Q. Turn, please, to the third page, and let's look in the
3 bottom left corner. Doesn't it say, quote, fuel tank
4 is mounted for impact protection ahead of the rear
5 suspension and between the body side rails, end quote?

6 **A. Yes, it does.**

7 Q. All right. I'll show you another document -- well,
8 first let me ask you this question. Move to strike my
9 previous words.

10 Isn't it true, sir, that Chrysler knew as
11 early as 1985 that midship tanks were better because
12 they gave impact protection in rear impact?

13 **A. I don't believe that to be the case.**

14 PRE-MARKED FOR IDENTIFICATION:

15 DEPOSITION EXHIBIT 95

16 9:45 a.m.

17 BY MR. BUTLER:

18 Q. Well, I'll show you what's been marked as Plaintiffs'
19 Exhibit Number 95. This document is an excerpt from a
20 Chrysler engineering brochure; isn't that correct?

21 MS. JEFFREY: Object as to form.

22 **A. I'm not familiar with it, but that's what it says.**

23 BY MR. BUTLER:

24 Q. Well, the front page has those two symbols, that's the
25 Chrysler symbol, isn't it?

1 **A. That is.**

2 Q. Turn with me, please, to the third page. That says at
3 the top, 85, Dodge engineering, doesn't it?

4 **A. Yes.**

5 Q. And I'd like you to look on the left side about a
6 little more than halfway down, there is a bold heading
7 that says fuel tank location; do you see that?

8 **A. I do.**

9 Q. Doesn't that say, quote, on all models except the
10 rear-wheel-drive Diplomat the fuel tank is located
11 underneath the car beneath the rear seat where it's
12 forward of the rear suspension and between the body
13 side rails giving it protection in the event the car
14 is subjected to rear or side impacts? Did I read that
15 correctly?

16 **A. Yes, you did.**

17 Q. Isn't it true, sir, that the 1998 Dodge Durango also
18 had a midships tank?

19 **A. Yes, it did.**

20 Q. The truth is, sir, as we've learned from these
21 brochures, Chrysler was telling people about its
22 midship tanks and telling people that they were -- the
23 vehicles were safe because of those midship tanks;
24 isn't that correct?

25 **A. I believe we were saying that our vehicles are safe.**

1 **I don't believe it was only exclusively because of**
2 **midship tanks.**

3 Q. Well, let me ask you this: Do you know of any
4 occasion where Chrysler or any of its related entities
5 that it would subsequently become warned people about
6 dangers from rear tanks?

7 **A. I don't believe we warned people of any dangers that**
8 **don't exist.**

9 Q. Did Chrysler or any of its successor entities --
10 strike that.

11 Did Chrysler or any of the other companies
12 that it would later become to your knowledge ever warn
13 people about dangers associated with rear tanks in
14 rear impact?

15 MS. JEFFREY: Object to form.

16 **A. I don't believe we warned people if there's no danger,**
17 **so I don't believe that we warned of a location of the**
18 **tank.**

19 BY MR. BUTLER:

20 Q. So the answer to that question is no, isn't it?

21 **A. No, we don't warn where there's no danger, we do not**
22 **notify or warn for no reason.**

23 MR. BUTLER: Move to strike as
24 nonresponsive everything after the word no.

25 BY MR. BUTLER:

1 Q. It's really beyond dispute, isn't it, that Chrysler
2 knew about the safety benefits of moving the gas tank
3 away from the rear?

4 MS. JEFFREY: Object to form.

5 **A. No, it's not beyond dispute.**

6 PRE-MARKED FOR IDENTIFICATION:

7 DEPOSITION EXHIBIT 40

8 10:48 a.m.

9 BY MR. BUTLER:

10 Q. All right. Well, let me show you what's been marked
11 as Plaintiffs' Exhibit 40. Now, do you recognize this
12 as the letter that Chrysler received from the Office
13 of Defects Investigation branch of the National
14 Highway Traffic Safety Administration on June 3, 2013?

15 **A. I don't recognize this, but that's what it says.**

16 Q. Well, did you know this is the letter where the Office
17 of Defects Investigation, or ODI, informed Chrysler
18 that the Grand Cherokees with the rear tanks were
19 defective?

20 **A. Could you repeat the question again, sorry, sir, I was**
21 **reading?**

22 Q. Sure.

23 Would you read my question back?

24 (The following requested portion of the
25 record was read by the reporter at

1 10:49 a.m.:

2 Q. Well, did you know this is the letter
3 where the Office of Defects Investigation,
4 or ODI, informed Chrysler that the Grand
5 Cherokees with the rear tanks were
6 defective?)

7 **A. I'm not familiar with that.**

8 BY MR. BUTLER:

9 Q. Well, isn't that what it -- strike that.

10 Turn to the second page, please, and I'm
11 going to read to you and ask if I've read correctly
12 the second sentence in the bottom paragraph there.
13 Doesn't it say, quote, Chrysler was certainly aware of
14 the safety benefits of placing the tank in front of
15 the rear axle, end quote? Did I read that correctly?

16 **A. Yes, as you package a car, the benefits are in**
17 **structure and support. A rear-mounted tank requires**
18 **more support, more structure, more weight.**

19 Q. Sir, my question was whether I read that correctly so
20 I will ask that again. Did I read that correctly?

21 **A. Yes, you did.**

22 Q. And then after that this letter from the Office of
23 Defects Investigation goes on to talk about an
24 internal Chrysler memorandum from Chrysler in 1978;
25 isn't that correct?

1 **A. Correct.**

2 Q. Did you know, sir, that Chrysler has admitted in this
3 case that it could have put the gas tank in the 1999
4 Grand Cherokee forward of the rear axle?

5 **A. I was not aware of that.**

6 MARKED FOR IDENTIFICATION:

7 DEPOSITION EXHIBIT 98

8 9:51 a.m.

9 BY MR. BUTLER:

10 Q. Well, let me show you what's been marked as
11 Plaintiffs' Exhibit 98. This appears to be a document
12 filed in the Walden against Chrysler case, doesn't it?

13 **A. Yes.**

14 Q. And it says in the front page, it's Chrysler's
15 response to requests for some -- requests for
16 admission; is that correct?

17 **A. Yes.**

18 Q. Turn to the next page, please, and I'll just ask you
19 about the second highlight there, and it says response
20 number 6, quote, Chrysler Group admits that it was
21 possible to locate a fuel tank in the 1993 through
22 1998 model year Jeep Grand Cherokee ZJ and the 1999
23 through 2004 model year Jeep Grand Cherokee WJ forward
24 of the rear axle, end quote. Did I read that
25 correctly?

1 **A. Yes.**

2 MR. BUTLER: Thank you. Let's take a
3 break.

4 MS. JEFFREY: Five minutes?

5 MR. BUTLER: Sure.

6 VIDEO TECHNICIAN: The time is 9:50 a.m.
7 We are now off the record.

8 (Recess taken at 9:50 a.m.)

9 (Back on the record at 10:00 a.m.)

10 VIDEO TECHNICIAN: We are now on the
11 record. The time is 10:00 a.m.

12 BY MR. BUTLER:

13 Q. You said a moment ago, I believe, quote, a
14 rear-mounted gas tank requires more structure, end
15 quote. Did I get that right?

16 **A. It requires structure in the rear of the vehicle.**

17 Q. Tell the jury why it is that a rear-mounted gas tank
18 requires more structure?

19 **A. A structure is required, one, to hold the tank up, of**
20 **course, because there's a considerable amount of fuel,**
21 **and second, the structure is there in -- for FMVSS 301**
22 **rear impact that's what our standard is, that's what**
23 **we design to, that's what the government dictates is**
24 **the required specification, and the structure is**
25 **necessary to comply with the government requirements.**

1 MR. BUTLER: Move to strike as
2 nonresponsive.

3 BY MR. BUTLER:

4 Q. Here's the question. Please tell the jury why it is
5 that a rear-mounted gas tank requires more structure?

6 **A. More than if you did not have a gas tank in the rear.**
7 **Again, if there was no fuel tank in the rear of the**
8 **vehicle, the structure would not be required because**
9 **there's no mass, nor -- there's no requirement for**
10 **protection --**

11 Q. Isn't it true, sir --

12 MS. JEFFREY: Was he -- I just wanted to
13 make sure he was done.

14 Were you done, Mr. Teets?

15 **THE WITNESS: That's --**

16 MS. JEFFREY: Okay.

17 **THE WITNESS: That's fine, yes.**

18 BY MR. BUTLER:

19 Q. Isn't it true, sir, that the issue you're dancing
20 around is that if you have a rear gas tank it's
21 dangerous --

22 MS. JEFFREY: Object to form.

23 BY MR. BUTLER:

24 Q. -- and it would require a lot of structure to try to
25 even make that thing comply with even the federal

1 minimum?

2 MS. JEFFREY: Object to form.

3 **A. No, that is not true, I am not dancing around that --**

4 BY MR. BUTLER:

5 Q. Well --

6 **A. -- and it does require structure, any system requires**
7 **structure, and to pass the required standards.**

8 Q. You're talking about the federal minimum, aren't you?

9 **A. It's a minimum requirement because standards have to**
10 **be written in a form of minimum or maximum. When you**
11 **write a standard, you can't -- you have to put a**
12 **number and call it either a minimum or a maximum.**

13 MR. BUTLER: Move to strike as entirely
14 nonresponsive.

15 BY MR. BUTLER:

16 Q. My question was aren't you talking about the federal
17 minimum, 301?

18 **A. I'm talking about the federal standard, which is not**
19 **minimum at all, it is not minimal --**

20 Q. We'll get back to that.

21 MS. JEFFREY: Were you done, Mr. Teets?

22 **A. I am not. It is not a minimal standard. It's a very**
23 **rigorous and very, very tough standard.**

24 BY MR. BUTLER:

25 Q. Is it your testimony then that the federal 301 is not

1 a, quote, minimum, end quote?

2 **A. It may state minimum because it's the minimum**
3 **requirement, but by no means is it minimal.**

4 Q. Well, let me just ask it this way. Isn't it true that
5 Judson Estes was exactly right, the reason it requires
6 more structure, if you're even going to try to do a
7 rear tank to even pass the federal minimum standard is
8 that a rear gas tank is vulnerable in rear impact?

9 MS. JEFFREY: Object to form.

10 BY MR. BUTLER:

11 Q. Wasn't he right about that?

12 **A. I don't believe he was. I think that was an opinion.**
13 **I think you do need structure no matter where you put**
14 **a fuel tank.**

15 MR. BUTLER: Move to strike as
16 nonresponsive everything after the word was.

17 BY MR. BUTLER:

18 Q. Now, you mentioned the federal 301 test so let's talk
19 about that. Isn't it true, sir, that federal law
20 itself, specifically the safety act, establishes that
21 those federal tests including 301 are, quote, minimum
22 standards, end quote?

23 **A. The standard itself is called an impact requirement**
24 **and it's an integrity and it states a minimum but it**
25 **is not minimal.**

1 Q. You don't disagree that the standard itself, the
2 federal law itself, states that it is a, quote,
3 minimum, end quote, do you?

4 **A. I'm stand -- I'll agree all standards have to be**
5 **written as a minimum or a maximum.**

6 Q. I'll just show you the exhibit.

7 MARKED FOR IDENTIFICATION:

8 DEPOSITION EXHIBIT 79

9 10:06 a.m.

10 BY MR. BUTLER:

11 Q. I'm showing you now what's been marked as Plaintiffs'
12 Exhibit Number 79. Isn't it true that this says,
13 quote, motor vehicle safety standard means a minimum
14 standard for motor vehicle or motor vehicle equivalent
15 performance, end quote? Did I read that correctly?

16 **A. Yes, you did. It's not minimal, there is a minimal**
17 **amount you must meet.**

18 MR. BUTLER: Move to strike as
19 nonresponsive everything after the word did.

20 BY MR. BUTLER:

21 Q. Isn't it true, sir, that there is no such thing as a
22 federal, quote, maximum, end quote, standard?

23 **A. As far as I know, that's true.**

24 Q. Isn't it also true that complying with one of these
25 federal minimums is no defense at all?

1 MS. JEFFREY: Object to form and
2 foundation.

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

4 PRE-MARKED FOR IDENTIFICATION:
5 DEPOSITION EXHIBIT 78
6 10:07 a.m.

7 BY MR. BUTLER:

8 Q. Well, let me show you Plaintiffs' Exhibit Number 78.
9 Doesn't this say 49 USC.V, section 30103 at the top?

10 **A. Yes.**

11 Q. That's part of the Federal Safety Act, isn't it?

12 **A. Apparently.**

13 Q. Quote, compliance with a motor vehicle safety standard
14 prescribed under this chapter does not exempt a person
15 from liability at common law, end quote. Did I read
16 that correctly?

17 **A. Yes, you did.**

18 Q. The truth is that merely complying with the federal
19 minimum is not enough to keep people safe, is it?

20 MS. JEFFREY: Object to form.

21 **A. I'm not an attorney so I can't actually describe what**
22 **is the liability in meeting standards or not meeting**
23 **standards. I do know that the car is designed to 301,**
24 **which is a very rigorous standard.**

25 MR. BUTLER: Move to strike as

1 nonresponsive.

2 BY MR. BUTLER:

3 Q. Isn't it true, sir, that merely meeting the federal
4 minimum 301 test is not enough to keep people safe?

5 MS. JEFFREY: Object to form.

6 **A. That is not true at all.**

7 BY MR. BUTLER:

8 Q. Well, are you aware that the CEO and president of Fiat
9 Chrysler automobiles, the company for which you now
10 work, has admitted that meeting the federal minimum is
11 not enough?

12 **A. I'm not aware of that.**

13 Q. You aren't aware that when asked, quote, is it your
14 position that merely complying with the federal
15 minimum standard is all an automaker has to do, end
16 quote, Marchionne responded, quote, no, I don't think
17 so, and effectively in some cases we have
18 intentionally gone beyond the minimum safety
19 standards, end quote. Do you remember I told you
20 that?

21 **A. We do exceed the standards, absolutely.**

22 Q. That wasn't the question. Did anybody tell you that's
23 what Marchionne said?

24 **A. I did not hear that, no.**

25 Q. Did you ask anybody what Marchionne said?

1 **A. I did not ask about what he said.**

2 Q. Isn't it true, sir, that automobile manufacturers like
3 Chrysler have known since the Pinto that rear gas
4 tanks were a bad idea?

5 MS. JEFFREY: Object to form.

6 **A. Rear gas tanks are not a bad idea, and since the**
7 **Pinto, that was before my time at Chrysler.**

8 BY MR. BUTLER:

9 Q. Well, you know the Ford Pinto had a rear gas tank,
10 don't you?

11 **A. I think in the '70s most cars had rear gas tanks.**

12 MR. BUTLER: Move to strike as
13 nonresponsive.

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

15 BY MR. BUTLER:

16 Q. And you know a lot -- that the Pintos were catching
17 fire when they were hit in the rear, don't you?

18 MS. JEFFREY: Object to form.

19 **A. I'm not familiar with the details of that incidences.**

20 BY MR. BUTLER:

21 Q. Well, you're a fuel systems expert, aren't you?

22 **A. I am.**

23 Q. Did you know that lots of people were burning alive in
24 the Pintos?

25 MS. JEFFREY: Object to form.

1 **A. The Pinto issue, if you would, was five years before I**
2 **graduated college.**

3 BY MR. BUTLER:

4 Q. Did you know that lots of people were burning alive in
5 the Pintos?

6 MS. JEFFREY: Object to form.

7 **A. I heard on the news Ford had an issue with the Pinto**
8 **and there were some fires. I don't know how many**
9 **people or what the scope of the issue was.**

10 BY MR. BUTLER:

11 Q. Well, the truth is that the -- strike that.

12 The truth is that the danger of rear gas
13 tanks has been well-known since the Pintos started
14 catching fire and burning people --

15 MS. JEFFREY: Object to form.

16 BY MR. BUTLER:

17 Q. -- isn't that true?

18 **A. I don't believe that to be true.**

19 Q. Well, pull out Plaintiffs' Exhibit 40, which is in
20 front of you.

21 **A. Uh-huh.**

22 Q. And it is that letter right here from the Office of
23 Defects Investigation, and I'll ask you to turn with
24 me to the second page? Let's look at the top
25 highlight. I'm going to read the first sentence of

1 the second to last para -- last paragraph. Quote,
2 prior to the 1970s fuel tanks in motor vehicles were
3 predominantly located aft of the rear axle. The
4 vulnerability of tanks located behind solid rear axles
5 in rear impacts became well-known following a series
6 of firey crashes involving the Ford Pinto, end quote.

7 Did I read that correctly?

8 **A. Yes. May I read more of the document?**

9 Q. Nope, but Ms. Jeffrey can ask you about that in her
10 time to ask questions if she would like to.

11 Did you know, sir, that just two days after
12 that letter people inside Chrysler were sending
13 e-mails back and forth about the Pinto?

14 **A. I did not know that.**

15 Q. Well, let me show you a document that's an e-mail
16 chain. Doesn't this look like an e-mail chain?

17 **A. Take a minute and look at it, please? Yes, there's a
18 few people's names on the e-mail.**

19 Q. Well, the one at the top --

20 MS. JEFFREY: Can I just ask, is this an
21 exhibit or are we going to mark it or not?

22 MR. BUTLER: No.

23 MS. JEFFREY: Okay.

24 BY MR. BUTLER:

25 Q. The name at the top is Douglas Betts, isn't it?

1 **A. Yes.**

2 Q. And if you look at his tag line there, it says he's
3 the senior vice-president and global head of quality
4 for Fiat SPA and Chrysler Group, L.L.C. Did I read
5 that correctly?

6 **A. Yes, you did.**

7 Q. His e-mail was sent on June 5, 2013, right?

8 **A. Correct.**

9 Q. That's two days after the letter that ODI, the Office
10 of Defects Investigation, sent on June 3, 2013, isn't
11 it?

12 **A. Correct.**

13 Q. And the subject line is Ford Pinto info. Did I read
14 that right?

15 **A. Yes.**

16 Q. Now, would you agree, sir, that rear impacts are very
17 common?

18 MS. JEFFREY: Object to form.

19 **A. I think there's many impacts, rear, front, I don't**
20 **think they are any more common or uncommon than any**
21 **impact.**

22 BY MR. BUTLER:

23 Q. Well, would you agree that rear impacts can be deadly?

24 **A. I agree that vehicles during accidents can be deadly,**
25 **rear, front, side, yes.**

1 Q. So the answer is yes, rear impacts can be deadly?

2 **A. As much as any other impact, yes.**

3 Q. Isn't that why Chrysler created a club to study rear
4 impacts?

5 **A. No.**

6 Q. Well, Chrysler did have something called the, quote,
7 rear impact tech club, didn't it?

8 **A. That club was created to better understand the**
9 **upcoming legislation involving the rewrite of FMVSS**
10 **301.**

11 MR. BUTLER: Move to strike as
12 nonresponsive, that wasn't my question.

13 BY MR. BUTLER:

14 Q. My question was just Chrysler had -- well, strike
15 that.

16 Isn't it true that Chrysler created a,
17 quote, rear impact tech club, end quote?

18 **A. We created a tech club to study rear impacts for**
19 **upcoming new legislation, correct.**

20 Q. And that was called the rear impact tech club?

21 **A. Correct.**

22 Q. Now, isn't it true that the rear impact tech club not
23 only studied rear impacts but also saved that
24 information to something called the rear impact tech
25 club database?

1 **A. I believe so.**

2 Q. And the reason Chrysler saved information about rear
3 impact to the rear impact tech club database was so
4 that people could have easy access to that information
5 in the future; isn't that true?

6 **A. I believe when you store any information on a database
7 it's so you can recall it later, yes.**

8 MARKED FOR IDENTIFICATION:

9 DEPOSITION EXHIBIT 105

10 10:15 a.m.

11 BY MR. BUTLER:

12 Q. I'm going to show you a document marked as Plaintiffs'
13 Exhibit Number 105. I may have handed you two copies,
14 may I get one back?

15 **A. Okay.**

16 Q. The first page of this document, Plaintiffs' Exhibit
17 105, says 2001 rear impact tech club accomplishments,
18 doesn't it?

19 **A. Yes.**

20 MS. JEFFREY: Counsel, I think you gave me
21 something with work product on it. Do you want to
22 swap?

23 MR. BUTLER: Thank you so much.

24 MS. JEFFREY: Yeah.

25 MR. BUTLER: Pass it back. It looks like

1 my handwriting so the work product probably wasn't any
2 good.

3 BY MR. BUTLER:

4 Q. Mr. Teets, the first page of Plaintiffs' Exhibit 105
5 says 2001 rear impact tech club accomplishments,
6 doesn't it?

7 **A. Yes.**

8 Q. Turn with me, please, to the page that's tabbed in
9 your copy and it says -- has the long number in the
10 top right that ends in 15. Are you there?

11 **A. This one here?**

12 Q. Yes.

13 **A. Okay.**

14 Q. This says Hampton against DaimlerChrysler up at the
15 top, doesn't it?

16 **A. Yes.**

17 Q. This is a Chrysler document?

18 **A. It appears so, yes.**

19 Q. And down here, the third bullet, doesn't it say,
20 quote, the rear impact tech club database was moved
21 from a development server to a production server in
22 August. Throughout the year all pertinent documents
23 were included in it for easy reference by the rear
24 impact tech club members; isn't that what it says?

25 **A. Correct.**

1 Q. You were one of the rear impact tech club members,
2 weren't you?

3 MS. JEFFREY: Object to form.

4 **A. Actually I was not a member of the tech club, although**
5 **I had occasionally to go in and present. I was given**
6 **information throughout the year but I don't believe I**
7 **was an official, I'll call it, I didn't go to every**
8 **meeting.**

9 BY MR. BUTLER:

10 Q. Well, you presented things to the rear impact tech
11 club, correct?

12 **A. Correct, many different topics, they were studying**
13 **fuel system being one of them.**

14 Q. Well, do you know -- strike that.

15 Well, why did Chrysler destroy the rear
16 impact tech club database?

17 **A. I wasn't aware it was destroyed.**

18 PRE-MARKED FOR IDENTIFICATION:

19 DEPOSITION EXHIBIT 20

20 10:18 a.m.

21 BY MR. BUTLER:

22 Q. Well, let me show you what's been marked as
23 Plaintiffs' Exhibit 20. This appears to be another
24 e-mail, doesn't it?

25 **A. Yes.**

1 Q. It's from Sheila Jeffrey, it says that at the top,
2 doesn't it?

3 **A. Yes.**

4 Q. You recognize that as one of FCA or Chrysler's
5 lawyers, don't you?

6 **A. Yes.**

7 Q. She's sitting in this room to your left; isn't that
8 correct?

9 **A. That's correct.**

10 Q. And turn, please, to the second page. Didn't she
11 write, quote, in any event, the rear impact tech club
12 database no longer exists and after reasonable and
13 diligent search and inquiry Chrysler Group has not
14 located the document; didn't I read that correctly?

15 **A. That is correct.**

16 Q. Now, did you know that the rear impact tech club
17 database had been destroyed?

18 **A. I did not know, but I do know as new computer systems
19 come on line databases get transferred some and some
20 do not. If they're no longer pertinent, the database
21 will not follow the new server or the new structure.**

22 MR. BUTLER: Move to strike as
23 nonresponsive.

24 BY MR. BUTLER:

25 Q. Can you tell us who might have destroyed or who could

1 have destroyed the rear impact tech club database?

2 **A. I don't believe the word destroyed is the proper word.**

3 Q. Well --

4 **A. As databases are generated and moved from server to**
5 **server, if it's no longer pertinent to any development**
6 **or design activity it doesn't -- it no longer needs to**
7 **exist.**

8 MR. BUTLER: Move to strike -- move to
9 strike the second part of that as nonresponsive.

10 BY MR. BUTLER:

11 Q. The rear impact tech club database used to exist,
12 didn't it?

13 **A. Apparently in the early 2000s, yes.**

14 Q. And Ms. Jeffrey's e-mail says on behalf of Chrysler
15 that it no longer exists, doesn't it?

16 **A. Apparently, yes.**

17 Q. Can you think of any reason why Chrysler would want to
18 destroy the rear impact tech club database?

19 MS. JEFFREY: Object to form.

20 **A. I don't believe there was a want to destroy. I**
21 **believe that as information gets transferred, it was**
22 **no longer pertinent, it's no longer relevant to what**
23 **we do. It's 15 years old or 12 or however long it**
24 **was, it's no longer needed.**

25 BY MR. BUTLER:

1 Q. Can you think of any reasons that Chrysler would want
2 to destroy the information that was contained on the
3 rear of that tech club database insofar as it might be
4 important to future people and juries?

5 **A. As data and information is outdated we don't keep it**
6 **as a matter of best practice. If -- if information**
7 **files are no longer relevant to our current product**
8 **line, we're working on future products, we don't keep**
9 **information that's not relevant.**

10 Q. The truth is you don't know why Chrysler destroyed the
11 rear impact tech club database, do you?

12 **A. The truth is I don't know that you call the word**
13 **destroyed, I think it just wasn't transferred and**
14 **carried on due to its relevancy.**

15 Q. The truth is -- move to strike as nonresponsive.

16 The truth is you don't know why Chrysler
17 destroyed the rear impact database such that it no
18 longer exists, do you?

19 **A. The truth is I didn't even know it no longer existed.**

20 Q. Isn't it true, sir, that the rear impact -- strike
21 that.

22 Isn't it true, sir, that the rear impact
23 tech club database might very well tell the jurors who
24 will be watching this videotape what Chrysler new
25 about rear impacts?

1 **A. It is a lot of information in that database. If you**
2 **look under accomplishments, there's eight or nine**
3 **bullet points, there's a lot of information that they**
4 **discovered during the course of their few years of**
5 **existence.**

6 **Q. Isn't it true that the rear impact tech club database**
7 **might very well tell the jurors who are going to be**
8 **watching this videotape -- strike that.**

9 Isn't it true that the rear impact tech
10 club database might very well tell the jurors who are
11 going to be watching this videotape what Chrysler knew
12 about rear tanks?

13 **A. It's true there is a lot of information that was**
14 **learned during the rear impact tech club on many**
15 **different points from structure to seats to occupant**
16 **safety, and it's true that if that database doesn't**
17 **exist, that information is lost.**

18 **Q. Is the answer to the question I just asked yes?**

19 **A. I believe I answered the question.**

20 **Q. You answered it yes, didn't you?**

21 **A. There is information that is lost.**

22 **Q. Now, we established some time ago, I believe, that**
23 **Chrysler knows that its vehicles will be involved in**
24 **rear-end collisions with underride; do you remember**
25 **that?**

1 **A. I remember covering those questions, yes.**

2 Q. Well, don't you still agree that Chrysler knows its
3 vehicles will be involved in rear-end collisions with
4 underride?

5 **A. I believe we understand that there will be an infinite
6 amount of collisions, underride from every direction,
7 yes.**

8 Q. Isn't it true that Chrysler failed to test the 1999
9 Grand Cherokee to see what would happen in a rear-end
10 collision with underride?

11 **A. You can't test every condition of every angle from
12 every speed from every car to car, so we didn't fail
13 to test, it was impossible to test every known and
14 it's an infinite amount of test investigations.**

15 MR. BUTLER: Move to strike as
16 nonresponsive.

17 BY MR. BUTLER:

18 Q. Isn't it true, sir, that Chrysler did not test the
19 1999 Grand Cherokee to see what would happen in a
20 rear-end collision with underride?

21 **A. We test to FMVSS 301, and that's the standard that we
22 use and we exceed that standard, significantly exceed
23 that standard.**

24 Q. Is that the -- does -- strike that.

25 Isn't it true that all Chrysler did with

1 the 1999 Grand Cherokee was test it to the federal 301
2 test?

3 MS. JEFFREY: Object to form.

4 **A. We -- that is the test we develop and design and test**
5 **all of our vehicles to.**

6 MR. BUTLER: Would you please read my
7 question back?

8 (The following requested portion of the
9 record was read by the reporter at
10 11:25 a.m.):

11 Q. Isn't it true that all Chrysler did
12 with the 1999 Grand Cherokee was test it to
13 the federal 301 test?)

14 **A. Actually we test many, many other tests. However, all**
15 **of our cars are exposed to 301 and validated and we**
16 **comply and exceed 301. There are many, many, many**
17 **other tests that we could go into.**

18 MR. BUTLER: Move to strike as
19 nonresponsive.

20 BY MR. BUTLER:

21 Q. With respect to rear impact, isn't it true that all
22 Chrysler did with regard to testing the 1999 Grand
23 Cherokee was test it to the federal 301 test?

24 **A. As I said, all of our cars are tested, including the**
25 **Grand Cherokee, to 301.**

1 Q. Sir, that wasn't my question. My question was isn't
2 it true that with respect to rear impact, all Chrysler
3 did in terms of testing the 1999 Grand Cherokee was
4 test to the federal 301 test?

5 **A. We didn't do any other development or compliance tests**
6 **except that test, if that's your question.**

7 Q. That is.

8 **A. Okay.**

9 Q. Chrysler did not do any other development or
10 compliance or any other test with respect to rear
11 impact except the federal 301; isn't that true?

12 **A. Yeah, that's the standard we test and develop and**
13 **comply to.**

14 Q. Now, the 301 test does not test for underride, does
15 it?

16 **A. I don't believe the 301 test at this time did.**

17 Q. Isn't it true that automakers, including Chrysler,
18 know that their vehicles will be struck by other
19 vehicles?

20 **A. Obvious.**

21 Q. The federal minimum 301 test that Chrysler ran on the
22 1999 Grand Cherokee didn't involve the Grand Cherokee
23 being struck by another vehicle, did it?

24 **A. The 301 test has five different crash modes, which the**
25 **government when they wrote that standard with industry**

1 experts has a conglomerate of all the standards, so it
2 is not a -- a unique scenario. There's five very
3 specific tests that are meant to be a composite of
4 potential impacts.

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

7 BY MR. BUTLER:

8 Q. Isn't it true, sir, that with respect to rear impact,
9 the federal minimum test that Chrysler ran on the 1999
10 Grand Cherokee did not involve the Grand Cherokee
11 being hit by another vehicle?

12 A. That is true, we don't.

13 Q. The truth is Chrysler never ran a test on the 1993 to
14 2004 Grand Cherokees involving a Grand Cherokee being
15 hit in the rear by another vehicle?

16 A. The 301 test has -- it's a sled, it's a vehicle
17 simulation, a flat barrier that is impacted with the
18 vehicle while --

19 Q. Isn't it true, sir, that --

20 MS. JEFFREY: Wait.

21 Were you done?

22 A. It was a flat barrier weighing 3,500 pounds made of
23 steel with plywood on the front so the vehicle is --
24 has less rebound and kind of grabs the car as it hits.
25 I'm not an impact test engineer but that was the

1 **standard that was used for years.**

2 MR. BUTLER: Move to strike as
3 nonresponsive.

4 BY MR. BUTLER:

5 Q. The truth is, sir, Chrysler never ran a rear-impact
6 test with a 1993 to 2004 Grand Cherokee involving the
7 Grand Cherokee being hit by another passenger vehicle
8 like you would find on the roads of the United States
9 of America?

10 **A. We do not do car-to-car testing, that is true.**

11 MR. BUTLER: Let's take a break.

12 MR. BUTLER, JR.: Let's take a video break.

13 VIDEO TECHNICIAN: The time is 10:27 a.m.

14 We are now off the record.

15 (Recess taken at 10:27 a.m.)

16 (Back On the record at 10:38 a.m.)

17 VIDEO TECHNICIAN: We are now on the
18 record. The time is 10:38 a.m.

19 BY MR. BUTLER:

20 Q. You said about the federal minimum of 301, I think I
21 got this quotation correct, quote, the government when
22 it wrote that standard with industry experts, end
23 quote; do you remember saying that?

24 **A. Yes.**

25 Q. Isn't it true that for decades the government has only

1 required what, quote, the industry, end quote, would
2 agree to?

3 **A. No, that's not exactly true. The way a -- a**
4 **rulemaking goes on, from what I understand, I was not**
5 **involved in this one, but other such rulemaking, is**
6 **it's a collaborative effort between the government**
7 **hires consultants and experts and then industry is**
8 **also involved in workshops, and I was involved in**
9 **emissions standards quite a bit, but some of the**
10 **workshops take years of back and forth, what -- what**
11 **is the capability and -- and what is the requirement**
12 **and then the necessity, and they want to make sure**
13 **they hit a goal, not just they have a standard, make**
14 **sure the goals are attained.**

15 MR. BUTLER: Move to strike as
16 nonresponsive everything after the word true.

17 BY MR. BUTLER:

18 Q. Isn't it true the automakers have great influence over
19 NHTSA?

20 MS. JEFFREY: Object to form.

21 **A. I don't believe that to be true at all. I think it's**
22 **a very collaborative effort between us and NHTSA.**

23 BY MR. BUTLER:

24 Q. Well, hadn't the 301 test that Chrysler used on the
25 1999 Grand Cherokee been around since the 1970s?

1 **A. I believe the first rewrite was in the '70s, in the**
2 **'91, so that standard was still valid, yes.**

3 Q. It was a -- it was a 30 mile an hour rear-end test
4 with a plywood barrier, right?

5 **A. No, it was a steel carriage, 3,500 pound steel**
6 **carriage, it did have a plywood face, three-quarter**
7 **inch plywood face on it to -- from what I was told, to**
8 **help the -- the contact of the two vehicles so they**
9 **wouldn't slide as much so more energy would actually**
10 **go into the car.**

11 MR. BUTLER: Move to strike as
12 nonresponsive.

13 BY MR. BUTLER:

14 Q. Isn't it true, sir, that the test that Chrysler used,
15 the federal minimum test, on the 1999 Grand Cherokee
16 involved a rear impact at 30 mile an hour with a face
17 of a sheet of plywood?

18 **A. The plywood was on the steel structure and it was 30**
19 **mile an hour, correct.**

20 Q. Now, you said twice that the car was, quote, designed
21 to 301, referring to the federal minimum standard; do
22 you remember saying that?

23 **A. Yes.**

24 Q. Now, that's why Chrysler never ran a rear-impact crash
25 test on these Grand Cherokees with the rear gas

1 tank -- strike that.

2 That's why Chrysler never ran a rear-impact
3 crash test on these Grand Cherokees with the rear gas
4 tanks at more than 31 miles an hour; isn't that true?

5 **A. The standard requires a 30 mile an hour crash so**
6 **that's what we ran the test at, correct.**

7 Q. Isn't it true that Chrysler knew if it ran a
8 rear-impact crash test on these Grand Cherokees with
9 rear tanks at more than 30 miles an hour the tank was
10 going to fail?

11 MS. JEFFREY: Object to form.

12 **A. I don't believe that to be true.**

13 BY MR. BUTLER:

14 Q. Well, isn't it true that in the one and only crash
15 test that Chrysler ever ran on the 1999 Grand Cherokee
16 at more than 30 miles an hour, Chrysler first put a
17 steel cage around the gas tank and a steel bumper beam
18 on the back of the car?

19 **A. I'm aware there was some development crashes being**
20 **conducted for the new rewrite, the notice of proposed**
21 **rulemaking for the redo of the FM 301.**

22 MARKED FOR IDENTIFICATION:

23 DEPOSITION EXHIBIT 15-A

24 10:44 a.m.

25 BY MR. BUTLER:

1 Q. Well, let me show you what's been marked as
2 Plaintiffs' Exhibit Number 15-A. This is a vehicle
3 crash test letter; isn't that what it says at the top?

4 **A. Yes.**

5 Q. And this is the -- something that Chrysler generates
6 after it runs a crash test, right?

7 **A. Yes.**

8 Q. And the purpose of this test -- well, strike that.
9 This test was run in 1999, doesn't it say
10 that at the top left of the document?

11 **A. Yes.**

12 Q. And it was run on the then-current Grand Cherokee,
13 wasn't it?

14 MS. JEFFREY: Object to form.

15 BY MR. BUTLER:

16 Q. I'll draw your attention to the build condition part
17 down here where it says on current WJ body; did I read
18 that correctly?

19 **A. Correct.**

20 Q. WJ was just Chrysler's code for the 1999 to 2004 Grand
21 Cherokee, right?

22 **A. That was that then too, yes.**

23 Q. And this was a 50 mile an hour test, wasn't it, it
24 says that by impact, type and target speed?

25 **A. I'm trying to locate that.**

1 Q. Well, that would be up at the -- near the top where it
2 says impact type on the left; do you see that?

3 **A. Yes. Okay.**

4 Q. And then it says target speed, 50.1 mile an hour?

5 **A. Uh-huh.**

6 Q. Isn't that right?

7 MS. JEFFREY: You have to answer yes or no.

8 **A. Yes.**

9 BY MR. BUTLER:

10 Q. And isn't it true, sir, that before Chrysler ran this
11 50 mile an hour test on the 1999 Grand Cherokee,
12 Chrysler put a steel cage around the gas tank?

13 **A. This was a development test that I would assume prior
14 to this structural analysis was done and support was,
15 perhaps, needed for upcoming requirements.**

16 Q. Doesn't it say, sir, here under build condition,
17 quote, structural cage to represent '04 model year
18 concept, end quote?

19 **A. I'm trying to find that location.**

20 Q. It's right here under build condition, the very first
21 bullet point?

22 **A. Okay.**

23 Q. Doesn't that say, quote, structural cage to represent
24 '04 model year concept, end quote?

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

1 Q. Doesn't this also say that Chrysler before running
2 this test involved -- strike that.

3 Doesn't this also say that before running
4 this test Chrysler installed a rear bumper beam? Look
5 at the fourth bullet down under build condition.

6 **A. Yes. It says KJ body, rear bumper beam.**

7 Q. Now look at the -- at the next page, please. Doesn't
8 that say VC 7937 in the top left?

9 **A. Yes.**

10 Q. That stands for vehicle crash and then the crash test
11 number, doesn't it?

12 **A. Correct.**

13 Q. And if you look at this picture you can see in green
14 the steel cage that Chrysler put around the gas tank
15 location, can't you?

16 **A. Yes.**

17 Q. And you can see in red the bumper beam that Chrysler
18 installed on this vehicle, can't you?

19 **A. Correct.**

20 Q. And isn't it true that after running this test for the
21 2005 model year Grand Cherokee, Chrysler chose to use
22 a midship tank design with the gas tank forward of the
23 rear axle?

24 **A. Sometime during the development, during the packaging**
25 **of the '05 renewal, the tank -- the decision was made**

1 **apparently to have the tank midship, correct.**

2 Q. Chrysler never sold to any customer a Grand Cherokee
3 that looked like the one in this picture that we just
4 looked at marked VC 7937, did it?

5 **A. This was a development-welded structure. I don't**
6 **believe it was a saleable type of product.**

7 Q. Isn't it true the answer is no, Chrysler never sold a
8 vehicle like this?

9 **A. And this is a development steel weldment around the**
10 **tank. It was not --**

11 Q. The question, sir --

12 **A. -- it was never intended for sale, and it did not sell**
13 **it.**

14 Q. Did Chrysler ever warn people that in order to
15 survive -- strike that.

16 Did Chrysler ever warn people that in order
17 to have any chance of surviving a 50 mile an hour rear
18 impact test, the 1999 Grand Cherokee had to have a
19 steel cage around the gas tank location and a bumper
20 beam installed?

21 **A. We don't warn the public unless there's a defect of**
22 **some sort, and we work with NHTSA to have warnings,**
23 **and we do warn the public and repair if there is a**
24 **problem or defect, and so we did not warn because**
25 **there was nothing to warn for.**

1 MR. BUTLER: Let's take a break.

2 VIDEO TECHNICIAN: The time is 10:47 a.m.

3 We are now off the record.

4 (Off the record at 10:47 a.m.)

5 (Back on the record at 10:48 a.m.)

6 VIDEO TECHNICIAN: We are now on the
7 record. The time is 10:48 a.m.

8 MR. BUTLER: I have no further questions.

9 MS. JEFFREY: I am going to have some
10 questions, I'd like to take a five-minute break.

11 VIDEO TECHNICIAN: The time is 10:48 a.m.
12 We are now off the record.

13 (Recess taken at 10:48 a.m.)

14 (Back on the record at 10:58 a.m.)

15 VIDEO TECHNICIAN: We are now on the
16 record. The time is 10:58 a.m.

17 MS. JEFFREY: I have no questions.

18 MR. BUTLER: All right, I think that
19 concludes the deposition.

20 MS. JEFFREY: Thank you.

21 MR. BUTLER: Thank you all.

22 VIDEO TECHNICIAN: The time is 10:59 a.m.
23 We are now off the record.

24 (Deposition concluded at 10:59 a.m.

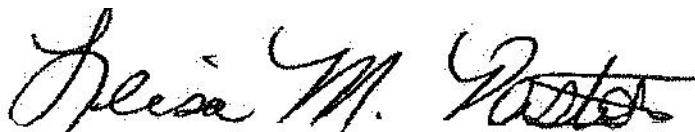
25 Signature of the witness was requested.)

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CERTIFICATE OF NOTARY

STATE OF MICHIGAN)
) SS
COUNTY OF MONROE)

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

1 TO: Sheila Jeffrey
2 Re: Signature of Deponent Michael Teets
3 Date Errata due back at our offices: 2/26/2015
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
7 Pursuant to Rule 30(7)(e) of the Federal Rules of Civil
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 _____

21 _____

22 Reason for change _____

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24 _____

25 Reason for change _____

1 Page _____ Line _____ Change _____

2 _____

3 Reason for change _____

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5 _____

6 Reason for change _____

7 Page _____ Line _____ Change _____

8 _____

9 Reason for change _____

10 Page _____ Line _____ Change _____

11 _____

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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