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PLEASE REPLY TO NEW JERSEY

May 25, 2012

VIA FAX & NJ LAWYERS' SERVICE

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Re: **Thomas Kline, et al. v. Loman Auto Group, et al.**  
Docket No.: **MRS-L-3575-08**  
Date of Loss: **February 24, 2007**

Dear Counselors:

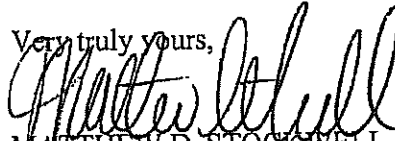
Pursuant to R 4:17-7, defendant Loman Auto Group hereby amends its Answers to Interrogatories and Document Production to include the enclosed supplemental report dated May 25, 2012 of Stephen J. Fenton, P.E. and Gray Beauchamp, P.E.

I certify that the foregoing was not reasonably available or discoverable with the exercise of due diligence sooner. Please note that nothing contained in the attached report is to be construed as an adoptive admission.

Counsel  
May 25, 2012  
Page 2 of 2

Should you have any questions, please do not hesitate to contact the undersigned.

Very truly yours,



MATTHEW D. STOCKWELL

MDS/im  
Enclosures

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www.kineticorp.com



Forensic Engineering and Visualization

May 25, 2012

Matthew D. Stockwell  
Callahan & Fusco LLC  
72 Eagle Rock Avenue, Suite 320  
East Hanover, NJ 07936

RE: *Kline et al. v. Loman Auto Group*

#### SUPPLEMENTAL REPORT

Dear Mr. Stockwell,

Since issuing our initial report on December 19, 2011, Kineticorp has received additional materials and completed additional work. A discussion of the additional materials as well as our additional work product is outlined in this supplemental report. It should be noted that our original opinions expressed in our initial report remain unchanged. Those opinions are listed below for convenience:

#### Summary of Conclusions

As a result of our investigation and analysis, Kineticorp reached the following conclusions related to this crash:

1. The Jeep was involved in two impacts. The first occurred when the Jeep was rear ended by the Toyota. The second occurred when the Toyota pushed the Jeep into the Subaru.
2. During the first impact, the Toyota was traveling approximately 73 mph and the Jeep was either stopped or moving slowly.
3. As a result of being impacted by the Toyota, the Jeep experienced a  $\Delta V$  of approximately 38 mph.
4. During the second impact, the Toyota and Jeep were traveling approximately 33 mph and the Subaru was either stopped or moving slowly.
5. The fire did not occur until the second impact when the Jeep was crushed between the Toyota and the Subaru.
6. The Jeep's fuel system was not breached during the first impact.
7. During the second impact, the Toyota penetrated underneath the Jeep, causing the Jeep to roll towards the passenger's side.
8. The initial impact between the Toyota and the Jeep was approximately 6 times greater than the Federal Motor Vehicle Safety Standard (FMVSS) 301 test for fuel system integrity, in terms of impact energy.
9. The severity of accident was increased substantially due to the Jeep being crushed between the Toyota and the Subaru.

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Procedure

- In conducting our investigation and analysis, Kineticorp engineers reviewed and analyzed the documents, photographs and video listed in Appendix A. These materials were provided to Kineticorp prior to our initial report.
- Kineticorp engineers also reviewed and analyzed the documents, photographs and video listed in Appendix B. These materials were provided to Kineticorp since issuing our initial report.
- Kineticorp obtained technical specifications for a FMVSS 301 Moving Deformable Barrier.
- Kineticorp inspected, documented, photographed the accident site on January 13, 2012.
- Kineticorp inspected, documented, photographed and scanned a 2005 Jeep Grand Cherokee on January 20, 2012.
- Kineticorp analyzed the effects of restitution to the dynamic damage of the Jeep. This analysis considered the accident reconstruction literature, including the following publications:
  - o Daily, John, et al., Fundamentals of Traffic Crash Reconstruction, Institute of Police Technology and Management, 2<sup>nd</sup> Printing, June 2006.
  - o Rose, Nathan A., Fenton, Stephen J., Beauchamp, Gray A., "Restitution Modeling for Crush Analysis: Theory and Validation," 2006-01-0908, Society of Automotive Engineers, Warrendale, PA, 2005.

**Discussion of Provided Crash Tests:** Among the additional materials supplied to Kineticorp, portions of five crash tests were included. Three of these tests involved a Ford Taurus impacting the rear of a Jeep Grand Cherokee. Two involve a Ford Taurus impacting the rear of a Ford Explorer. At the date of this report, Kineticorp has not received any supplemental reports from the plaintiffs discussing the significance of each of these tests. Presumably, the plaintiffs intend to use these tests to bolster opinions that an alternative tank position would have prevented a post-collision fire in the subject accident. However, major differences between the subject accident and the crash tests preclude their use as foundation for these opinions. In all of these tests, the plaintiffs have chosen an impacting vehicle with a significantly lower front end than the subject Toyota Sienna, introduced offset that did not occur in the subject accident, and failed to include a vehicle to act as a backstop. For any two vehicles on the market, it is possible to design a test such that one vehicle performs better than another in that test. However, if the test conditions are drastically different than those in the subject accident to be analyzed, as in this case, then the results from the test are irrelevant to the subject accident and are misleading. These tests fail to answer the two pertinent questions that they presumably intend to answer:

1. Did the initial impact from the Toyota Sienna cause a breach in the Jeep's fuel system?
2. Would the Explorer fuel system have performed differently in the subject accident?

Instead, the tests speak only to the differences between the Jeep and Explorer in other hypothetical and significantly different impacts. Table 1 summarizes each of the 5 crash tests. Each individual test is then discussed below.

Test Date	Jeep Grand Cherokee Tests			Ford Explorer Tests	
	1/19/2011	5/16/2011	7/1/2010	8/3/2010	9/28/2010
Test #	TR-p31015-01a	tr-p31070-01-nlc	10008	10011	10014
Bullet Vehicle	White 1987 Ford Taurus	Top 1988 Ford Taurus	Blue 2000 Ford Taurus	Blue 2003 Ford Taurus	Blue 2001 Ford Taurus
Target Vehicle	Gold 1999 Jeep Grand Cherokee Laredo	White 1996 Grand Cherokee Limited	Red 1995 Grand Cherokee	Red 1995 Explorer 2 door	Red 1998 Explorer 4 door
Bullet Vehical Weight (lb)	3560.0	3539.3	3302.5	3117.3	3342.2
Target Vehical weight (lb)	4357.4	4483.1	4097.8	3994.7	4301.2
Impact Velocity (mph)	50.0	40.0	50.0	69.6	75.3
Target Vehicle Rear Overlap (%)	70.0	70.0	70.0	70.0	100.0

Table 1

1/14/11 & 5/16/11 Jeep Grand Cherokee Tests: These tests were discussed in our initial report. For convenience, that discussion is repeated again here. Both of these test reports were produced for the Center for Auto Safety

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(CAS) by KARCO<sup>1</sup>. These tests involved 1999 and 1996 Jeep Grand Cherokee vehicles being impacted by Ford Taurus'. Kineticorp determined that the energy involved in the initial impact between the Toyota and Jeep in the subject accident was approximately 2 times greater than the 1999 Jeep test, and approximately 4 times greater than the 1996 Jeep test.

The subject accident was significantly different than the KARCO tests in terms of the lateral and vertical alignment of the vehicles. The top image in Figure 1 depicts the initial impact alignment between the Toyota and the Jeep. The image below shows the alignment between the Taurus and Jeep from test TR-P31070-01-NC. The top of the bumper of each vehicle has been indicated, the Jeep in red and the impacting vehicle in yellow. As depicted, there was good bumper alignment in the subject accident. However, in the KARCO test, the entire bumper of the Taurus was beneath the bumper of the Jeep. The test setup is conducive to vehicle under-ride, the subject accident was not. In both KARCO tests, the tires on the Jeep were significantly larger than the tires on the subject Jeep at the time of the accident. Also, the tires on the test Taurus were significantly smaller than the recommended tire size for that vehicle in test TR-P31070-01-NC. These tire differences make it easier for the Taurus to under-ride the rear of the Jeep in the tests. Further, the test tire pressures were not listed in the test reports and it appears that the tires of the Taurus were underinflated for the test. This would lower front of the Taurus and make it easier for the tires of the Taurus to compress during the impact. Low tire pressure would also make it easier for the Taurus to under-ride the Jeep. The alignment between the test vehicles was drastically different than the alignment during the accident. In terms of under-ride propensity, the vehicle and tire selections in the test are skewed towards a worst case scenario for the Jeep's structural ability to absorb the crash energy. These conditions did not exist in the subject accident.

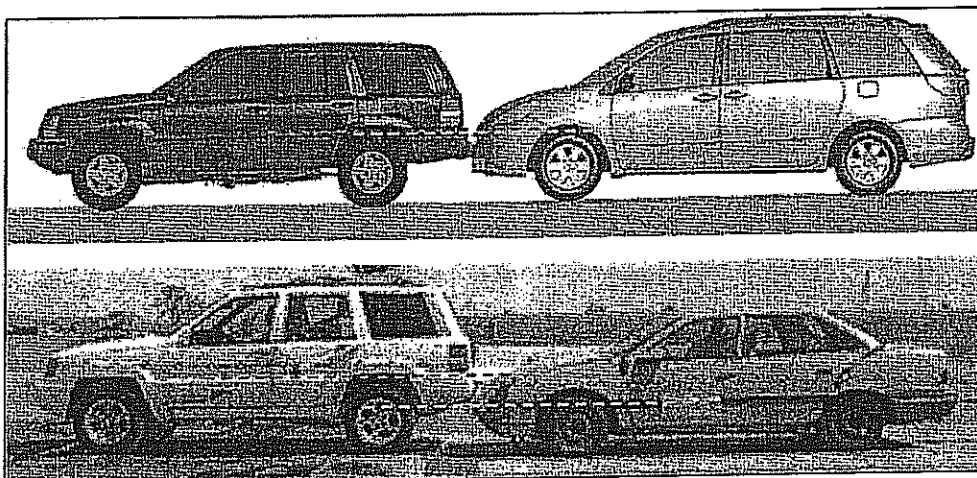


Figure 1

In the subject accident, the Toyota impacted squarely into the entire rear of the Jeep. In the KARCO tests, the collision was offset, such that the entire rear of the Jeep was not directly involved in the collision. This offset in the test is significant because less of the vehicle's width is available to absorb the impact energy. In other words, offset collisions are more severe in terms of energy absorption demands placed on the impacted vehicle. Since the subject accident was a full overlap collision, the offset tests are misrepresentative of the subject accident. The top image in Figure 2 depicts the lateral alignment of the vehicles in the subject accident. The red line indicates the center of the Jeep, the yellow line indicates the center of the Toyota. The KARCO test is depicted below.<sup>2</sup> In the KARCO test, the Taurus is offset significantly to the left at impact. Due the lateral and vertical alignment differences, no meaningful comparisons can be made between the subject accident and the KARCO test results. It should also be noted that components in the test Jeeps were removed, such as the spare tire, door panels and the rear side windows.

<sup>1</sup> Test numbers TR-P31070-01-NC and TR-P31015-01-A

<sup>2</sup> Note the distortion from the KARCO video makes the Jeep appear wider than it is.

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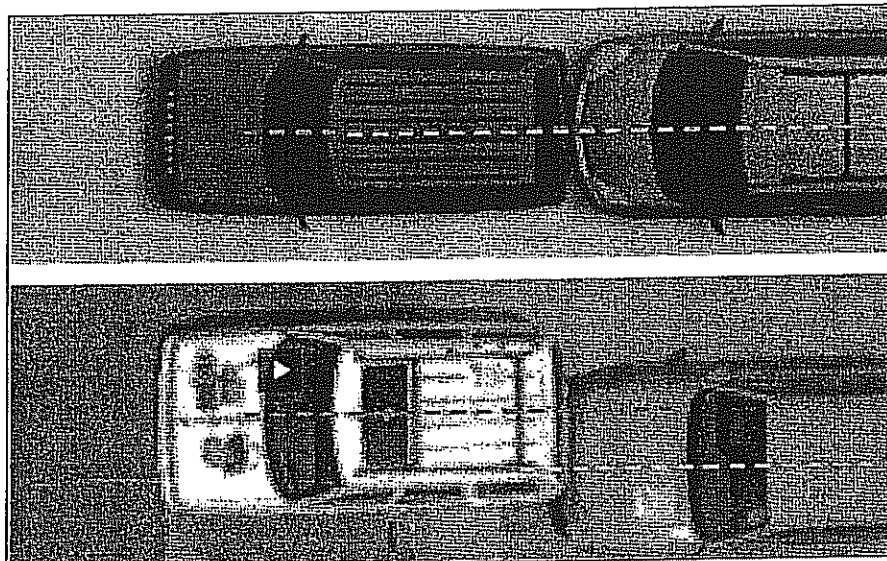


Figure 2

Neither test included a third vehicle, to act as a backstop and create a secondary loading event. And thus, these tests do not take into account the additional severity introduced by a second loading event or under-ride to an already damaged vehicle. This is another significant difference from the subject accident.

7/1/10 Jeep Grand Cherokee Test: Due to the vertical and lateral alignment of the 7/1/10 test<sup>3</sup>, the test is significantly different than the subject accident for the same reasons as the tests discussed previously. This test also utilized larger than recommended size tires on the Jeep, similar to the previously discussed tests, which elevated the risk of under-ride. Along with being dissimilar to the subject accident, this test is also dissimilar to an upgraded FMVSS 301 test. The authors of the test report refer to the 7/1/10 crash test as a 301 crash test on 35 occasions in the report, however, despite major differences. Figure 3 depicts the impact orientation in the 7/1/10 crash test. Below that, is the impact orientation in an upgraded FMVSS 301 test, which uses a moving deformable barrier to impact the vehicle. As can be seen in the lower image, the flat honeycomb structure of the barrier would directly contact the rear bumper of the Jeep in the 301 crash test configuration.

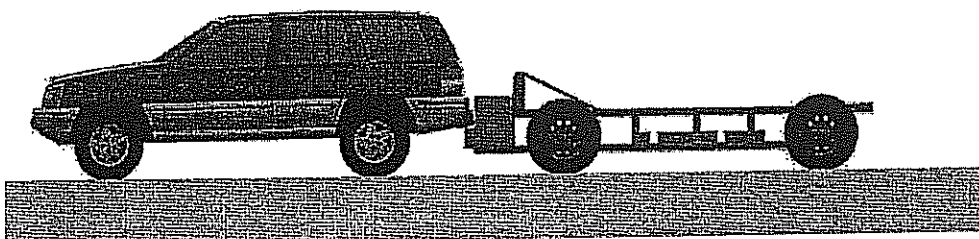
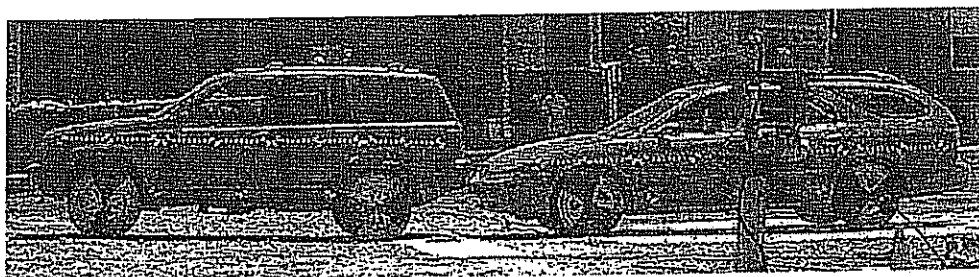


Figure 3

<sup>3</sup> Test number 10008

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The front of the barrier is significantly higher than the front end of the Ford Taurus. Therefore, it would be unlikely that the barrier would under-ride the rear of the Jeep. On the other hand, the front end of the Taurus, in combination with the larger tires of the Jeep in the 7/1/10 test, was conducive to under-ride. The test surface in the 7/1/10 test was uneven, and a mix of dirt and concrete. It appears that the rear tires of the Jeep are at least partially resting on the higher concrete slab, while the front tires are on the dirt at impact. This uneven surface likely affected the vertical alignment and under-ride propensity as well. It was improper and misleading for the authors to refer to the 7/1/10 test as a "301 rear impact test."

8/3/10 and 9/28/10 Ford Explorer Crash Tests: The Ford Explorer tests are not representative of the subject accident. As was the case in the Grand Cherokee tests, the vertical alignment of the impacting vehicles in the Ford Explorer tests were substantially different than in the subject accident. In the subject accident, the Subaru acted as a backstop and created a second loading event to the already damaged Jeep while the Ford Explorer tests did not include a third vehicle in front of the Ford. This difference is illustrated in Figures 4 and 5. Figure 4 depicts the Jeep in the subject accident approximately 1/2 second after the initial impact, crushed between the Toyota and Subaru. Figure 5 depicts the 9/28/10 test approximately 1/2 second after impact, when the loading event had ended. The secondary loading event in the subject accident was significant. In fact, it was during this secondary event that the Jeep fuel system was breached, as discussed in our initial report. Since the backstop vehicle was not included in the Explorer crash tests, any comparison made between the performances of the fuel system of the Jeep in the subject accident to that of the Explorer in the crash tests is irrelevant and improper.

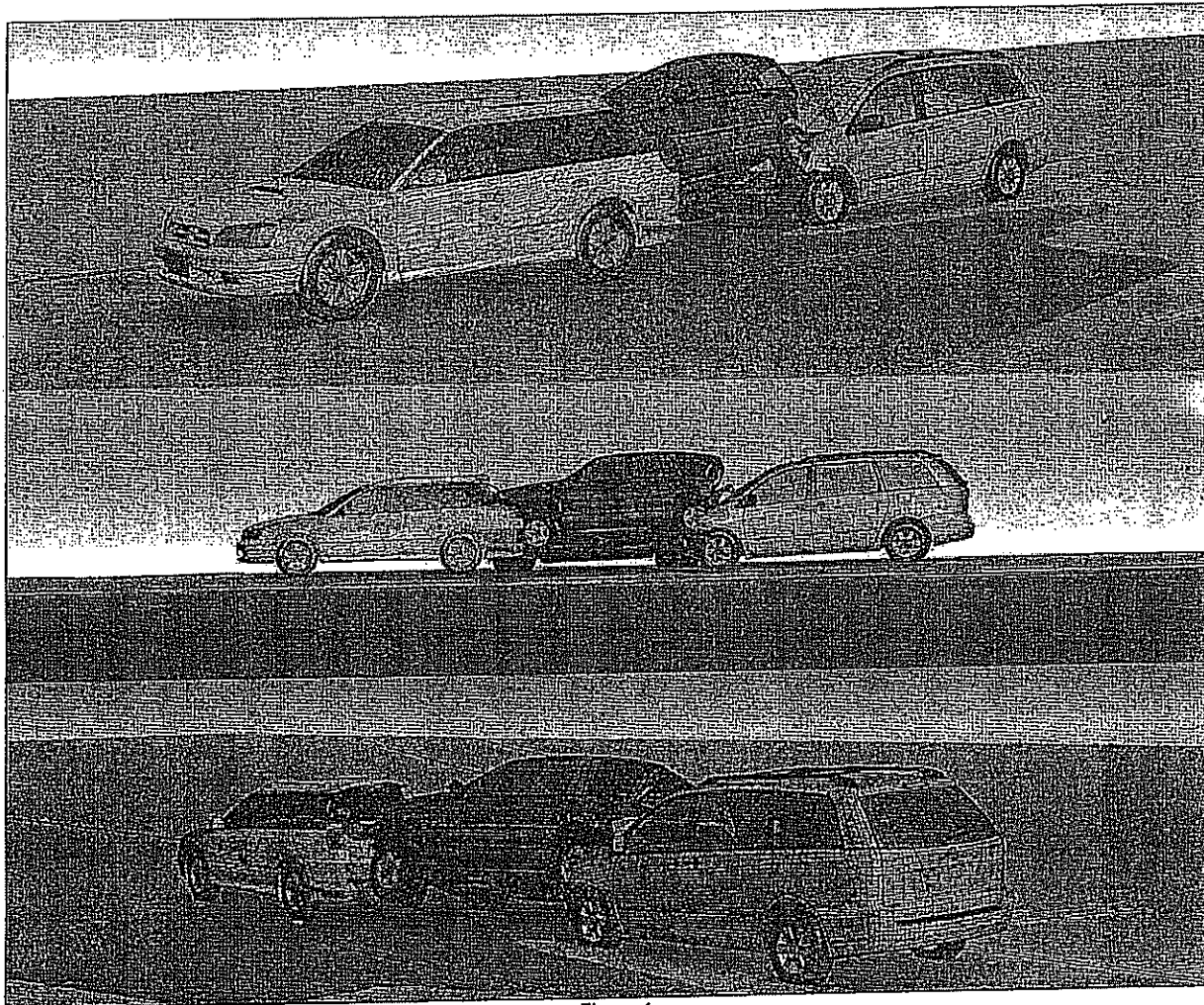


Figure 4



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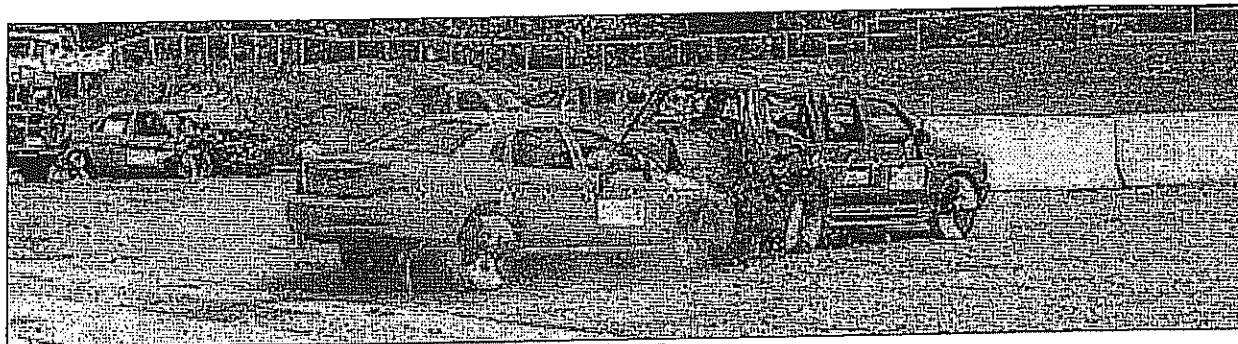


Figure 5

The tire selections in the Ford Explorer tests differed than those in the Jeep Grand Cherokee tests. As discussed previously, in each of the Grand Cherokee tests, the Jeep was outfitted with larger than manufacturer recommended tires. These larger tires had the effect of raising the Jeep and increasing the likelihood of under-ride. On the other hand, both of the Ford Explorers tested adhered to manufacturer recommended tire sizes. An even comparison would have utilized manufacturer recommended tires on all tested vehicles. It should also be noted that at the time of the subject accident, the tires on the subject Jeep were of manufacturer recommended size.

Dynamic Deformation Analysis: In Kinetcorp's initial report, we determined the amount of static deformation to the rear axle of the Jeep. During the accident, the structure of the Jeep would have deformed more dynamically, due to restitution effects. Kinetcorp also analyzed whether an alternative tank position, such as that in a 2005 Jeep Grand Cherokee, would have been damaged in the subject accident. Figure 6 depicts the fuel tank of a 2005 Jeep Grand Cherokee aligned with our model of an undamaged 1996 Jeep Grand Cherokee. Figure 7, 8, and 9 depict the position of the axle during the collision assuming 0, 5 and 10 percent restitution, respectively. In all cases, the axle would have damaged the tank in this alternative location.

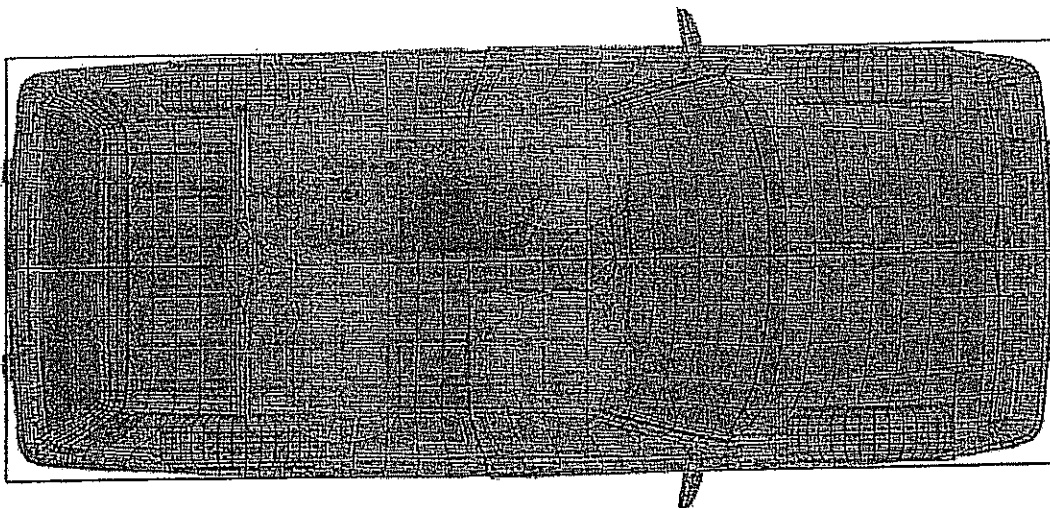


Figure 6



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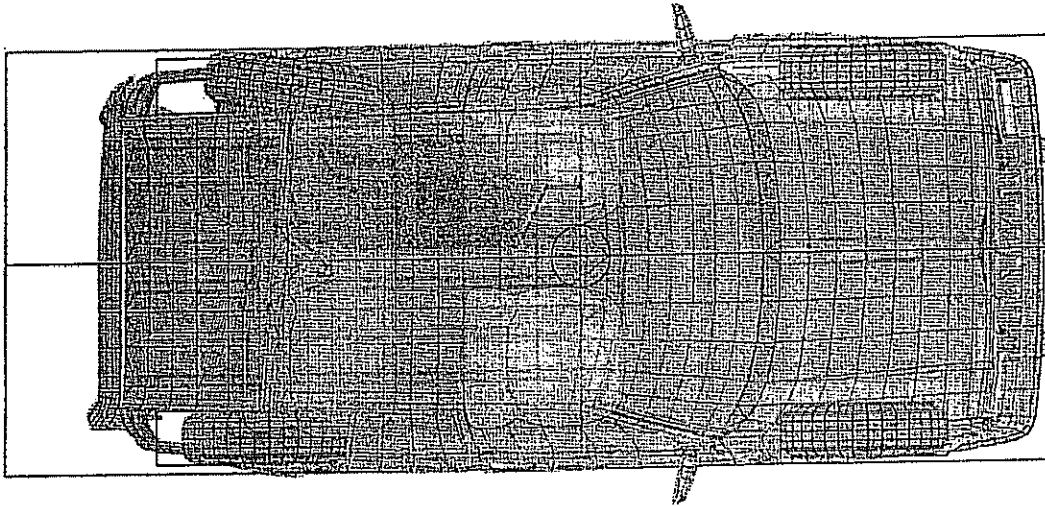


Figure 7 -  $\epsilon = 0$

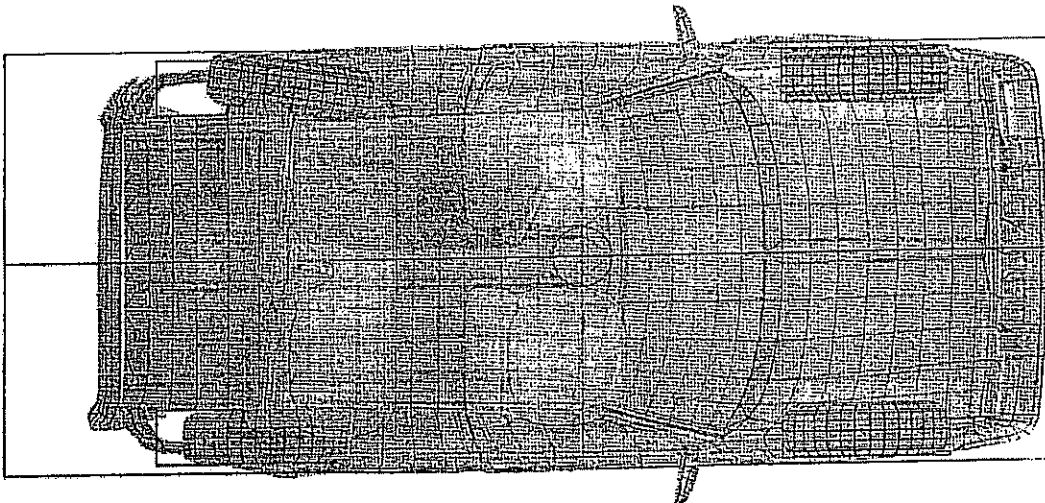


Figure 8 -  $\epsilon = 0.05$

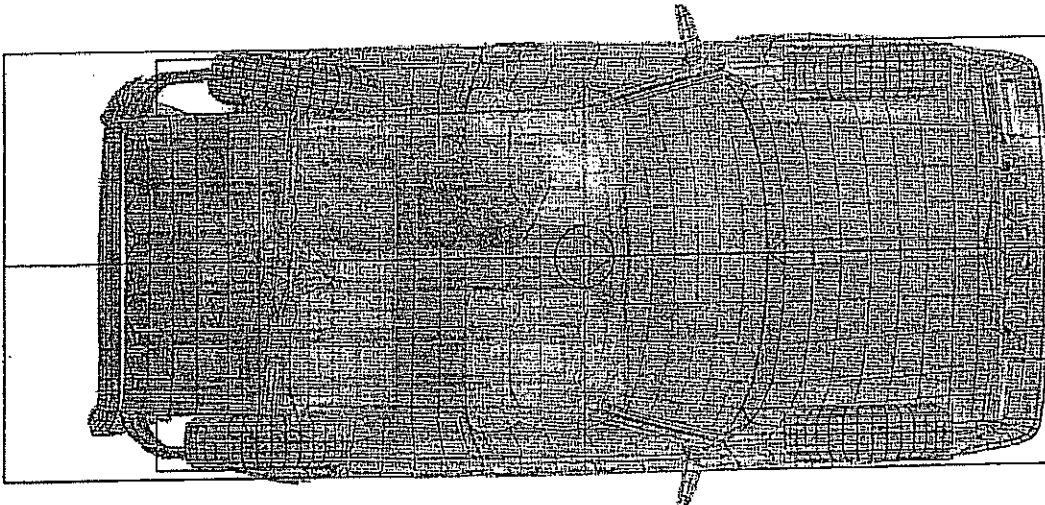
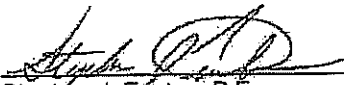


Figure 9 -  $\epsilon = 0.10$

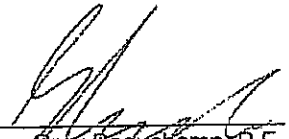
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**Closing:** The opinions and conclusions expressed in this report were reached to a reasonable degree of engineering certainty based on our investigation and analysis to date. We reserve the right to critique opposing experts after having the opportunity to review their file materials and testimony. Further information, data, investigation or analysis may lead us to revise or supplement these opinions and conclusions. Kineticorp may produce additional graphics and animations for use at trial.

Sincerely,

  
Stephen J. Fenton, P.E.  
Principal Engineer



  
Gray Beauchamp, P.E.  
Senior Engineer



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**Appendix A**  
List of Provided Materials

New Jersey Police Crash Investigation Report; Case No. B080-2007-00445A dated 02/24/2007  
State of New Jersey Division of Fire Safety Incident Report dated 02/24/2007

- **Digital Photographs**
  - PDF containing 41 police photos
  - PDF containing 420 photos of Vehicle Inspection taken by Dynamic Analysis Group
  - PDF containing 16 photos of Scene Inspection taken by Dynamic Analysis Group
  - PDF containing 81 black and white photos taken by Mr. Alcalá
  - 41 8x10 police photos
- **Digital Video**
  - Video provided by Paul Sheridan
- **Deposition Transcripts (with Exhibits\*)**
  - Victoria Morgan-Alcalá\*
  - Detective Kevin Bartles
  - Natalie Rawls
  - Phillip Kaeser
  - Paul Sheridan\*
  - Trooper Elkin Orellano\*
- **Expert Reports**
  - Donald Phillips Initial Report (National Forensic Engineers, Inc.) dated 04/22/09
  - Donald Phillips Supplemental Report (National Forensic Engineers, Inc.) dated 07/25/2011
  - Neal Hanneman Preliminary Report (Forensic Automotive Consulting Team) dated 12/04/2009
  - Neal Hanneman Supplemental Report (Forensic Automotive Consulting Team) dated 08/03/2011
  - William Bush Report (Bush Investigative Services, LLC) dated 12/03/09
  - Paul Sheridan Report – Second Revision dated 08/10/2011
  - Ross IS Zbar Report (Plastic and Reconstructive Surgery) dated 08/09/10
  - Nicholas Durisek Report (Dynamic Analysis Group, LLC) dated 03/14/11
  - Robert Banta Report (Banta Technical Services, LLC) dated 03/24/11
  - Robert Banta Supplemental Report (Banta Technical Services, LLC) dated 12/12/11
  - Carl Nash Report dated 08/11/2011
  - Thomas Bennent Report (Forensic Medicine and Pathology) dated 09/09/11
  - Rose Ray Report (Exponent Failure Analysis Associates, Inc.) "Analysis of the Real-World Crash Performance of 1993-1998 Jeep Grand Cherokees dated 12/15/11
- **Legal Documents**
  - Second Amended Complaint
  - Natalie Rawls Answers
  - Deposition Notices for Plaintiff's Experts
  - Deposition Subpoena Notices
  - Answers to Form C Interrogatories
- **Other Documents**
  - Natalie Rawls Statement of Order
  - ZJ Real World Crash Study
  - ZJ Frames and Bumpers Manual
  - ZJ Fuel System Manual

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**Appendix B**  
List of Provided Materials

• **Digital Photographs**

- 4 PDFs containing 24 photos – Recall Bracket ZJ Body
- 1 digital photo – Tank Components
- 1 digital photo – Filler
- 1 digital photo – System
- 3 digital photos – 1995 Cherokee in 3-1-11 SC Crash
- 26 digital photos – 1995 Jeep TAMC Spare Tank
- 145 digital photos – Karco Jeep Grand Cherokee 1/16/11
- PDF containing 35 photos – Sierra Hamptons Police Photos
- 1 digital photo – Jeep GC Lineup History
- 1 digital photo - Karco 1996 Test Jeep Underside Tow Hitch
- 1 digital photo - Karco 1996 Test Jeep Underside
- 1 digital photo – MVFRI Test Vehicle
- 1 digital photo – WJ FFH-1 Filler Tube with Part #
- 1 digital photo – WJ FFH-1
- 1 digital photo – ZJ FFH Part Label-1
- 1 digital photo – ZJ FFH-1 Filler Tube with Label
- 4 digital photos – ZJ FFH 1-4
- 1 digital photo – ZJ FFH-4 Filler Tube with Label
- 1 digital photo – ZJ FFH-4 Filler Tube with Part #
- 1 digital photo – Mesh Close-up
- 1 digital photo - 1996 Grand Cherokee Rear Impact 40 mph 041
- 1 digital photo - 1996 Grand Cherokee Rear Impact 40 mph 042
- 1 digital photo - 1996 Grand Cherokee Rear Impact 40 mph 044
- PDF containing 56 photos of vehicle – Bennet Hartsel, Brett Jones FARS# 450844
- 1 digital photo - Jeep on Spit at 90 degrees leaking Stoddard Fluid
- 3 digital photos – Karco 162, 244, 249
- 133 digital photos – Post-Test
- 16 digital photos – Pretest
- 4 digital photos of vehicle crash test from Jeep Test Reports (Unofficial)
- 56 digital photos – 10008 Pretest
- 8 digital photos – Karco Test
- 39 digital photos – Rear Crash Test
- 60 digital photos – Karco disc final report
- 21 digital photos – Karco Photos
- 62 digital photos – W Poplin Engineering
- 39 digital photos – W Poplin Engineering
- 42 digital photos – W Poplin Engineering
- 60 digital photos – W Poplin Engineering
- 120 digital photos – Rear Impact Test 2 FHWA Report and Data – Post-Test
- 46 digital photos – Rear Impact Test 2 FHWA Report and Data – Pre-Test
- 19 digital photos – Rear Impact Test 2 FHWA Report and Data – Test Still
- 96 digital photos – Rear Impact Test 3 FHWA Report and Data – Post-Test
- 77 digital photos – Rear Impact Test 3 FHWA Report and Data – Pre-Test
- 17 digital photos – Rear Impact Test 3 FHWA Report and Data – Test Still

• **Digital Video**

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- o Impact Simulator video "24071 Fuel Pump Module Close-up"
- o Impact Simulator video "24071 Left Overall"
- o Impact Simulator video "24072 Fuel Pump Module Close-up"
- o Impact Simulator video "24072 Left Overall"
- o Video concerning the Orlando, FL ZJ fire
- o Karco Jeep Imact video
- o Karco Jeep Spit Test video
- o 10008 - CI Right Perp 2 video
- o 10008 - CI Right Perp video
- o 10008 - Left Perp Close video
- o 10008 - Left Perp video
- o 10008 - Overhead video
- o 10008 - Realtime video
- o 10008 - Realtime-Right Front Iso video
- o 10008 - Right Perp video
- o 3 videos – Karco High Speed Videos
- o 3 videos – Karco Real Time Videos
- o 10011-CI Left Perp Close 1 video
- o 10011-CI Left Perp Close 2 video
- o 10011-CI Left Perp Close video
- o 10011-Left Perp video
- o 10011-Left Side Realtime video
- o 10011-Overhead video
- o 10011-Right Perp video
- o 10011-Right Rear Iso video
- o 10011-Rightside Realtime video
- o FHWA Report – "Movie" video
- o 10014 Onboard video
- o 10014-Left Front Iso Realtime video
- o 10014-Left Perp Close Crush video
- o 10014-Left Perp Close Dummie video
- o 10014-Left Perp Overall video
- o 10014-Right Front Iso Realtime video
- o 10014-Right Front Iso video
- o 10014-Right Perp Crush video
- o 10014-Right Perp Overall video
- o 10014-Right Perp Target Dummie video
- o 10014-Right Perp video
- o 10014-Right Rear Iso video
- **Deposition Transcripts (with Exhibits\*)**
  - o Robert Banta (Jarmon v. Chrysler)
  - o Thomas Kline
  - o David Dillion
  - o Estes Exhibits 1-14, 20, 23-24 (Exhibits Only)
  - o Eusebio Sierra (Austin v. Chrysler)
- **Expert Materials**
  - o Carlos Fonseca Autopsy Report (Office of County Medical Examiner) dated 02/25/07
  - o Paul Sheridan Report – revision of subject report (DVD) dated 01/02/2012

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- o Neil Hanneman File Materials
- o Paul Sheridan File Materials
- o Woodrow Poplin (Poplin Engineering) dated 5/21/04 (for accident involving Bennett Hartsel and Bret Jonnes DOL: 12/17/03)
  
- **Legal Documents**
  - o Chrysler Group's Second Supplemental Response to Request No. 10 of Notice to Produce Documents
  - o Chrysler Group's Response to Plaintiff's Form C(4) Interrogatories
  - o Chrysler Group's Response to Plaintiff's Form C Interrogatories
  - o Loman's Expert Disclosure
  - o Plaintiff's Amended Answers to Interrogatories (letter in lieu of more formal response dated 4/12/12)
  - o Summons and Complaint (Austin v. Chrysler)
  
- **Other Documents**
  - o Technical Service Bulletins 08-28-96;4-03-98; 14-06-97; 14-08-97; 18-02-98; 18-03-96B; 18-19-98
  - o NHTSA Excel Spreadsheet labeled "INRD-PE10031-43424P"
  - o Karco E-mail correspondence produced from subpoena Part I and Part II
  - o Allstate Insurance Company's file material produced in response to subpoena
  - o FARS and State Crash Data Analysis
  - o Chrysler Group Presentation to the Office of Defect Investigations dated 04/16/11
  - o Chrysler Group's submissions to NHTSA in connection with PE10-031
  - o Impact Simulator Tests labeled "IS24071" "IS24072"
  - o DaimlerChrysler Safety Recall to Install a Fuel Tank Blocker Bracket onto Your Vehicle
  - o Correspondence letter from Sheridan to De Filippo re: Traffic Crash Report Amendment dated 4/3/12
  - o Drive Shaft Drawing
  - o Prop Shaft Drawing
  - o 1-17-11 Recall Check on Karco Test Jeep
  - o 70 MPH FHWA Pre-Test Report
  - o 70 MPH FHWA Test Report
  - o 1996 Karco Jeep Description
  - o 1996 Karco Jeep Recall Check
  - o 1997 Jeep Grand Cherokee Frame Hose Bracket pp 1-8
  - o 1997 ZJ Towing Hitch Frame Diagram
  - o 1997 ZJ Towing Hitch Part Diagram
  - o MY 1993-2008 Jeep Grand Cherokee Fatal Fire Crashes, 1992-2008
  - o 2009 00564 Data Dump Grand Cherokee Fire
  - o 2009 00564 Data Dump Jeep Liberty Fire
  - o 2010.00725 Data Dump CRSHS Jeep Grand Cherokee Fire 0-09 (1 and 2)
  - o All Jeep Grand Cherokee in EWR
  - o NYSPD Police Accident Report for Jose Sierra dated 09/01/99
  - o The South Hampton Independent Article dated 9/8/99
  - o CAS NHTSA Meeting
  - o Article by Mickey Ciokajo from Chicago Tribune dated 9/5/00
  - o Article from Ricci-Leopold dated 7/30/02
  - o MY 1993-2004 Jeep Grand Cherokee Fatal Fire Crashes, 1992-2010
  - o Alabama Uniform Traffic Accident Report, Cas No: 07-004583 dated 3/1/07
  - o Hartsel Autopsy
  - o Honda Passport MHE
  - o Jeep Grand Cherokee crash test spreadsheet

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- o Jeep FARS Log 2010
- o Jeep Fuel Tank Blocker Recall
- o Jeep Grand Cherokee Defect Petition (2)
- o Jarmon Autopsy
- o Karco Proposal Dec-1
- o Karco Test Contract
- o Kline Accident Report Docs
- o LA Times Jeep Deaths
- o Lee Death LA 10-27-99
- o Marchionne Letter 2010 FARS2
- o Mitchell's Frame & Filler Tube Diagrams
- o Model Year Total
- o NASS 2006-81-16 - Case Summary
- o NCAC Crash Conference Test Vehicles-1
- o RE FARS Case 481432 July 10 2009 2004 Jeep Grand Cherokee Ft Worth TX Fire
- o Sheridan to Ditlow 6-10-10 cc Strickland et al
- o Sheridan to Strickland 2-11 no attachments
- o Sheridan to Strickland 2-15-11
- o XEE Callout for Fuel Tank Skid Plate
- o 99-04 Jeep Grand Cherokee Fuel Tank
- o PowerPoint presentation - 1999 Jeep Grand Cherokee Rear Impact
- o Full Field Dump of Fatal Crash Data Involving 1973 through 1987 Model Year GMC/Chevy C/K Pickups with Fire – FARS 2008
- o Full Field Dump of Fatal Crash Data Involving 1993 through 2010 Model Year Jeep Grand Cherokees with Fire – FARS 2008
- o State of Georgia Traffic Crash Report, Crash No: C900078901-01 dated 03/06/12
- o NCAC Vehicle Test Setup Form, Test NO. 1008 dated 7/1/10
- o 2003 Fatality Analysis Reporting System Accident Level
- o CAS Subpoena to Karco Engineering dated 9/14/11
- o CAS to Administrator Strickland on Jeep 11-17-11
- o Full Field Dump of Fatal Crash Data For Crashes Involving a 1993 to 2011 Model Year Ford Crown Victoria with Fire
- o Full Field Dump of Fatal Crash Data For Crashes Involving a 1993 to 2011 Model Year Lincoln Town Car with Fire
- o Full Field Dump of Fatal Crash Data For Crashes Involving a 1993 to 2011 Model Year Mercury Grand Marquis with Fire
- o Article titled "U.S. Probes Gas Tank Fires in Grand Cherokees" dated 8/25/10
- o DDM Consultants letter - 1993-2004 Jeep Grand Cherokee Post-Collision Fire Death Defect Investigation dated 2/13/12
- o Grand Cherokee EWR Injury and Death 1993-04
- o Hartsel Letter re: Investigation Preliminary to Recall of Jeep Grand Cherokee dated 9/12/10
- o NHTSA Defect Investigations Documents
- o Jeep Letter to Boyd 1-28-11
- o 85 Karco email correspondences
- o Jeep Crash Test Deposit
- o Jeep Crash Test Payment
- o Center for Auto Safety P31070
- o Kline letter dated 8/31/10
- o Letter to Fiat-Chrysler on Grand Cherokee 11-17-11
- o Ditlow letter to Marchionne dated 4/5/12



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- o MIF Jeep Fire NHTSA NCSS 10-29-10
- o Nader - Vehicle Recall Table for Italy 2011
- o NEH crash test spreadsheet - Morris Kline-1
- o Newsday Article – "LI crashes figure in Jeep Probe"
- o Center for Auto Safety Vehicle to Vehicle
- o Center For Auto Safety Client Survey
- o Docket Submission - Pinto Recall 8-2-11
- o Xler-NHTSA FARS Meeting 4-6-11
- o FOIL Upcoming Crash Tests 07-29-2010 & 08-03-2010
- o Tests with reconfigured belts
- o Test Series Proposal
- o Test Vehicle Purchase Payment
- o TR-P31015-01-NC Appendix B – Instrumentation Data Traces
- o Harald Wester CV
- o Experimental Test of Occupant Entrapment – Ford Taurus into rear of Jeep Grand Cherokee 30% offset, 50 mph
- o Jeep Tests 10008
- o Jeep Cherokee Test – 10008 Report - Camera Locations
- o Jeep Cherokee Test – 10008 Report –Data Analysis
- o Jeep Cherokee Test – 10008 Report –Rear Impact Test 1 Report
- o Test Report for: The Center of Auto Safety 50 mph Vehicle to Vehicle 30% Offset Rear Impact – 1999 Jeep Grand Cherokee Laredo, 1987 Ford Taurus
- o Test Report for: The Center of Auto Safety 50 mph Vehicle to Vehicle 30% Offset Rear Impact – 1996 Jeep Grand Cherokee Limited, 1988 Ford Taurus and Appendix A, B, C
- o Norman Hartsel letter to Woodrow Poplin re: Request for Report dated 9/25/10
- o Rear Impact Test 2 - Vehicle Specifications: Explorer Autocheck, Explorer CVS, Explorer Motoverse, Taurus Autocheck, Taurus CVS, Taurus Motoverse
- o Rear Impact Test 2 - Taurus X Acceleration Data Analysis
- o Rear Impact Test 2 - NCAC Taurus-Explorer 70 mph 1 fig 1
- o Rear Impact Test 2 - NCAC Taurus-Explorer 70 mph 1 fig 2
- o Rear Impact Test 2 - NCAC Taurus-Explorer 70 mph 1 fig 3
- o Experimental Test of Occupant Entrapment Ford Taurus into Rear of Ford Explorer 30% offset, 70 mph dated 8/3/10
- o FHWA Data Rear Impact Test 2: Explorer, Speed, Taurus
- o Vehicle Test Setup Form, Test No. 10011 dated 8/5/10
- o Rear Impact Test 3 - NCAC Taurus-Explorer 70 mph 1 fig 1
- o Rear Impact Test 3 - NCAC Taurus-Explorer 70 mph 1 fig 2
- o Rear Impact Test 3 - Taurus X Acceleration Data Analysis
- o Rear Impact Test 3 – Head X Acceleration Data Analysis
- o Rear Impact Test 3 - Vehicle Specifications: Explorer Autocheck, Explorer CVS, Explorer Motoverse, Taurus Autocheck, Taurus CVS, Taurus Motoverse
- o Experimental Test of Occupant Entrapment Ford Taurus into Rear of Ford Explorer 70 mph dated 9/28/10
- o Rear Impact Test 3 – Data: 10014, 10014-Onboard, Dummy Data
- o Vehicle Test Setup Form, Test No. 10014 dated 9/28/10