

1 UNITED STATES DISTRICT COURT  
2 SOUTHERN DISTRICT OF NEW YORK

3 -----X  
4 THE TAXIS FOR ALL CAMPAIGN, ET AL.,

5  
6 PLAINTIFFS,

7 -against- Case No.:  
8 11-CV-0237 (GBD)

9 NEW YORK CITY TAXI AND LIMOUSINE COMMISSION, ET AL.,  
10 DEFENDANTS.  
11 -----X

12 DATE: September 19, 2013

13 TIME: 10:15 A.M.

14 DEPOSITION of PAUL V. SHERIDAN, a Nonparty  
15 Witness, taken by the Defendants, pursuant to a Notice and  
16 to the Federal Rules of Civil Procedure, held at the  
17 offices of Michael A. Cardozo, Esq., 100 Church Street, New  
18 York, New York, 10007, before David Sheldon, RPR, a Notary  
19 Public of the State of New York.

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1 A P P E A R A N C E S:

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3 SHEPPARD, MULLIN, RICHTER & HAMPTON, LLP  
4 Attorneys for the Plaintiffs  
5 THE TAXIS FOR ALL CAMPAIGN, ET AL.  
6 30 Rockefeller Plaza  
7 New York, New York 10112  
8 BY: DANIEL BROWN, ESQ.

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10 MICHAEL A. CARDOZO, ESQ.  
11 CORPORATION COUNSEL  
12 NEW YORK CITY LAW DEPARTMENT  
13 Attorney for the Defendants  
14 NEW YORK CITY TAXI AND LIMOUSINE COMMISSION, ET AL.  
15 100 Church Street  
16 New York, New York 10007  
17 BY: MICHELLE GOLDBERG-CAHN, ESQ., Senior Counsel  
18 File #: 2011-002104  
19 Control #: SSS08913

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18 ALSO PRESENT:  
19 MEERA JOSHI, GENERAL COUNSEL

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1 P A U L V. S H E R I D A N , called as a witness,  
2 having been first duly sworn by a Notary Public of the  
3 State of New York, was examined and testified as follows:

4 EXAMINATION BY

5 MS. GOLDBERG-CAHN:

6 Q. Please state your name for the record.

7 A. Paul V as in Victor, Sheridan.

8 Q. What is your business address?

9 A. 22357 Columbia Street, Dearborn, Michigan, 48124.

10 Q. Hello, Mr. Sheridan. How are you?

11 A. Okay.

12 Q. Before we get started, there are a few things  
13 that I want to make sure that you understand and you know.

14 We are here to ask you some questions. If at any  
15 time you don't understand what the question is or you want  
16 a clarification, you can let me know and that will be  
17 great. Is that okay?

18 A. Yes.

19 Q. Also, if at any time you want to take a break,  
20 just let us know. We only request that you cannot do so  
21 while the question is pending. Do you understand?

22 A. Yes.

23 Q. Is there anything that is preventing you today  
24 from testifying or that would make you unable to testify?

25 A. No.

## SHERIDAN

1 Q. Are you on any medication impairing your ability  
2 to testify?

3 A. None.

4 Q. Have you ever been deposed before?

5 A. Yes.

6 Q. Approximately, how many times?

7 A. Anywhere from forty to fifty times.

8 Q. So you know the drill?

9 A. Yes, I do.

10 Q. Okay. Great.

11 Did you meet with anyone in preparation for your  
12 deposition today?

13 A. Yes.

14 Q. Who did you meet with?

15 A. Julia Pinover, and then by conference call, Sid  
16 Wolinsky and Kara Janssen. She works in the Berkeley  
17 office, and I have come to know her as Kara.

18 MR. BROWN: I believe it is spelled

19 J-a-n-s-s-e-n.

20 THE WITNESS: It's something like that.

21 Q. When did you have that meeting?

22 A. Um, we convened at, roughly, one o'clock  
23 yesterday afternoon.

24 Q. How long did that last?

25 A. I was on the elevator just before four o'clock.

## SHERIDAN

1 Q. Other than the documents that you have identified  
2 in the Declaration that you have submitted in this case,  
3 did you review any additional documents in preparation for  
4 today?

5 A. Yes. There's one that I reviewed. Um, it's part  
6 -- it's part of 571 of the National Highway Traffic Safety  
7 Administration Safety Act Code. And it's not the entire  
8 section of 571. It is just a few pages of the definitions.

9 Being responsive to your question, Counselor, the  
10 only other thing that I reviewed or had reviewed, and I  
11 don't have copies and I was not handed copies, it was an  
12 article entitled: Something about sharks.

13 That was yesterday. It was a document that  
14 reviews how experts should behave in depositions. Julia  
15 just showed me some highlights of that.

16 Q. Did you have any other meetings prior to today's  
17 deposition, other than the one that you identified as being  
18 held yesterday at approximately between 1 p.m. and 4 p.m.?

19 A. No. Just yesterday.

20 Q. Did you submit a Declaration in this case, the  
21 Taxis For All Campaign versus the New York City Taxi and  
22 Limousine Commission?

23 A. Yes.

24 MS. GOLDBERG-CAHN: I want to mark this as  
25 Defendants' Exhibit 1.

## SHERIDAN

1                   (Whereupon, the aforementioned document was  
2                   marked as Defendants' Exhibit 1 for  
3                   identification as of this date by the Reporter.)

4           Q.       I'm handing you a copy of what has been marked as  
5           Defendants' Exhibit 1 (handing). So it is the Expert  
6           Declaration of Paul V. Sheridan in Support of Plaintiffs'  
7           Motion for Partial Summary Judgement.

8                   I just want to indicate that it is the entire  
9           contents of the Declaration, and only just to save paper,  
10          it is Exhibit A and Exhibit H, I believe. So the remaining  
11          exhibits are not appended to this particular copy.

12                   Can you take a look at this and let me know if  
13          you have taken a chance to look through it?

14                   MR. BROWN: So what is the question?

15                   MS. GOLDBERG-CAHN: I'm just asking him to  
16          look at the document.

17          A.       It appears to be the document that I submitted  
18          and executed back on August 27th.

19          Q.       If you go to Exhibit A, which is towards the end,  
20          I just want to clarify, is this a copy of your resume or  
21          curriculum vitae?

22          A.       Yes.

23          Q.       So you attended Henry Ford Community College?

24          A.       Yes.

25          Q.       And the Orange County Community College in 1974?

## SHERIDAN

1 A. Yes.

2 Q. And you went to SUNY Albany, State University of  
3 Albany, and you finished in 1978?

4 A. Yes.

5 Q. And Cornell University, Johnson Graduate School  
6 of Management?

7 A. Yes.

8 Q. In 1980 you graduated?

9 A. Yes.

10 Q. What was the degree that you received from  
11 Cornell?

12 A. It was an MBA.

13 Q. While you were at Cornell, did you take any  
14 courses having to do with automotive?

15 A. No.

16 Q. Any courses having to deal with vehicles?

17 A. No.

18 Q. Any engineering courses?

19 A. There was one course in engineering that related  
20 to the logistics portion of the degree, and it was referred  
21 to as operations research, but operations research is not  
22 design engineering in the strict sense of the term. It has  
23 to do with logistics, but it was in the engineering school.

24 Q. What about while you were at SUNY Albany? Did  
25 you take any courses in automotive?

## SHERIDAN

1 A. No.

2 Q. Or vehicles?

3 A. No.

4 Q. Engineering?

5 A. Not engineering per se, no.

6 Q. What does that mean, "not engineering per se"?

7 A. Well, the substantive coursework of  
8 engineering or being an engineer is mathematics and  
9 physics. So although I didn't take courses that were  
10 entitled engineering, the actual textbook that we used for  
11 physics at SUNY Albany was entitled engineering physics.

12 So in that sense, the strict answer to your  
13 question is no, I didn't take engineering courses, but they  
14 were engineering oriented.

15 Q. Did you take any courses dealing with mechanical  
16 engineering?

17 A. No.

18 Q. What about while you were at Orange Community  
19 College?

20 A. No.

21 Q. Did you take any automotive courses?

22 A. No.

23 Q. Any courses dealing with vehicles?

24 A. No.

25 Q. Or any engineering courses?



## SHERIDAN

1           A.       Um, building construction, civil engineering  
2 types of courses, but not automotive courses.

3           Q.       Or no mechanical engineering courses?

4           A.       Correct.

5           Q.       In more recent years, it appears that you went to  
6 Henry Ford Community College.

7                    Can you explain about what that was for?

8           A.       Um, I initiated my coursework at Henry Ford in  
9 the area of a Microsoft Computer Applications certificate.  
10 And I also began taking and refreshing myself in some of  
11 the mathematics courses, and it turns out, I did get an  
12 associate's of arts degree, because I accumulated so many  
13 credits and they just suggested that I get the degree and I  
14 did. It was a two-fold purpose.

15                   One is that I wanted to get the certificate in  
16 the Microsoft Office Applications, because when you become  
17 my age, folks say that they know how to use a computer and  
18 they don't, but I have a piece of paper that says that I  
19 do.

20                   The other purpose was to update myself on the  
21 computer applications to calculus and linear algebra  
22 courses. When I took those courses back in the '70s,  
23 computers were not available. I want to say they were not  
24 pervasive, but the courses are now being taught with  
25 graphics.

## SHERIDAN

1           So I was taking courses to update myself on  
2 mathematics. So I took a number of those courses as well.  
3 It was primarily a refresher of my math skills.

4           Q.       Did you take any courses while at Henry Ford  
5 Community College dealing with automotive?

6           A.       No.

7           Q.       Or vehicles?

8           A.       No.

9           Q.       Engineering?

10          A.       No.

11          Q.       I see from your resume that you had indicated at  
12 the top of page 2 of the resume, indicating that you had  
13 eleven years of experience with the Chrysler Corporation?

14          A.       Yes.

15          Q.       What years was that? What time period did that  
16 span?

17          A.       Approximately, 1984 until the end of 1994.

18          Q.       And can you describe what it meant to do project  
19 management for the Dodge Caravan, Plymouth Voyager, and  
20 Dodge Chrysler Town & Country minivan vehicles?

21          A.       As a program manager -- you are looking at the  
22 first one, the top one, vehicle operations?

23          Q.       Yes.

24          A.       The project management and project planning  
25 management involve the general management of a product. So

## SHERIDAN

1 our role, um, encompasses all aspects of how a vehicle is  
2 conceived all the way through to production and sale. We  
3 are the eyes and ears of upper management when it comes to  
4 major product programs within the corporation. For  
5 example, if upper management wants a general answer or to  
6 be blunt about it in an honest answer to the question, they  
7 don't go to the engineers or the manufacturers. They go to  
8 their product management team. So they would come to us  
9 for the answer.

10 We are -- we are executive management's team on a  
11 particular project. We refer to them as platforms and we  
12 were the platform managers for the upper executives at  
13 Chrysler. And in this particular case, I was assigned to  
14 the minivans.

15 Q. Why is it the case that the engineers would not  
16 be the people to go to for honest or accurate answers?

17 MR. BROWN: Objection.

18 You can answer.

19 A. There's always bias in any organization as  
20 complex as the Chrysler Corporation. One of the reasons  
21 that we were put in place was so executive management could  
22 get the bigger picture. So that was their perspective. It  
23 is not a matter of engineers being dishonest. That's not  
24 my implication. It is bias that comes along with  
25 organizational structure.

## SHERIDAN

1 Q. So I am looking at the resume at the top of  
2 page 2, again, and as I understand it, there were two  
3 positions that you had at the Chrysler Corporation. One  
4 being the operations project manager and one being Jeep and  
5 Dodge engineering program manager; is that correct?

6 A. Yes.

7 Q. Which time period were you the vehicle operations  
8 project manager overseeing the minivans?

9 A. That would be from early 1991 until the end of  
10 1994.

11 Q. And which time period were you the Jeep and Dodge  
12 truck engineering program manager?

13 A. That was from 1987 until that early 1991 period.

14 Q. And you worked for the Ford Motor Company; is  
15 that correct?

16 A. Yes.

17 Q. And what time period did you work there for?

18 A. Approximately, 1980 until 1984 when I joined the  
19 Chrysler Corporation.

20 Q. So if I understand you correctly, you left  
21 Chrysler at the end of 1994?

22 A. At the end of 1984 -- oh, I left Chrysler at the  
23 end of 1994, correct. I'm sorry.

24 Q. Where did you go after that?

25 A. Well, I have been functioning as a vehicle safety

## SHERIDAN

1 expert since early 1995.

2 Q. So you work for yourself?

3 A. Yes.

4 Q. But since 1995, you have not been employed by any  
5 corporation or entity?

6 A. Correct.

7 Q. I just want to direct you to page 4 of the  
8 Declaration, paragraph 15.

9 Paragraph 15 states that I have testified as both  
10 fact and expert witness by affidavit and I have given live  
11 testimony, both at depositions and at trials, for several  
12 large and complex automotive product liability lawsuits.

13 If you continue to read, it refers to testimony  
14 in a case that you provided called Mohr, M-o-h-r, versus  
15 Daimler, D-a-i-m-l-e-r, Chrysler.

16 What was your testimony that you provided in that  
17 case?

18 A. It was expert testimony regarding the lack, the  
19 known lack of front crash worthiness in a Dodge Caravan  
20 vehicle.

21 Q. Were you retained by the plaintiff or the  
22 defendant?

23 A. By the plaintiff.

24 Q. And the case was against your former employer,  
25 Chrysler?

## SHERIDAN

1           A.       Yes. Daimler Chrysler and therefore Chrysler,  
2       because at the time that I left, it was Chrysler and then  
3       there was a merger between Mercedes-Benz or Daimler and  
4       Chrysler and that's how it was known as, Daimler Chrysler.

5           Q.       Do you know when that merger occurred?

6           A.       1998. 1999 was when the merger was completed.

7           Q.       So you were certified as an expert in the Federal  
8       Court as a general automotive safety management expert; is  
9       that correct?

10          A.       Yes.

11          Q.       Did your testimony in that case pertain at all to  
12       the classification of vehicles?

13          A.       In part, yes.

14          Q.       Can you explain that?

15          A.       Um, the vehicle in question, um, was a minivan,  
16       and as such, the classification that had been submitted to  
17       the government, what Chrysler had submitted it as became  
18       relevant to the testimony and the litigation.

19                    In this particular instance, the minivan was  
20       submitted to NHTSA as a truck, because at that point in  
21       time, when this 1999 minivan, I believe it was a 1999 model  
22       year minivan, there was only two categories that it would  
23       be possible submission as candidates to the government by  
24       Chrysler. One was passenger car and the other one was  
25       truck.

## SHERIDAN

1           So at that point in time, Chrysler submitted it  
2     as a truck, and that became germane to the testimony,  
3     because at that point in time, there were some limitations  
4     on what was required regarding safety, and that became  
5     germane to the testimony.

6           Q.     Did your testimony in that case critique or take  
7     issue with the classification submitted by Chrysler or  
8     Daimler Chrysler for the Dodge minivan?

9           A.     I don't think that it did, and the reason that I  
10    say it that way is because without having my transcript  
11    with me, it is difficult to remember my testimony in  
12    complete accurate details from eight years ago. But what I  
13    do recall is the fact that certain passenger safety car  
14    standards were not met. It became germane.

15                   I'm sorry; Counselor, did I answer your question?

16           Q.     I will ask you the next question.

17                   Which Federal Court was that, was the Mohr case  
18    in?

19           A.     Memphis.

20           Q.     Was it a District Court in Tennessee?

21           A.     If district means federal, then yes.

22           Q.     You also make reference in paragraph 15 of your  
23    Declaration to testimony provided in a case called Ahlberg  
24    versus Daimler Chrysler.

25                   When did you provide that testimony,

## SHERIDAN

1 approximately?

2 A. I'm going to say 2006 or 2007 or something like  
3 that.

4 Q. Were you certified as an expert in that case?

5 A. To the best of my recollection, yes.

6 Q. What kind of expert were you testifying as?

7 A. As a general automotive safety management expert.

8 Q. Do you recall what the case was about, the  
9 Ahlberg case?

10 A. That was another minivan case, and similar to  
11 Mohr, it involved the death of a person. In the Ahlberg  
12 matter, the minivan in question did not have a device that  
13 we refer to as brake transmission shift interlock, BTSI.  
14 Because the vehicle did not have brake transmission shift  
15 interlock or brake shift transmission interlock, the  
16 vehicle moved inadvertently and killed the child.

17 As a matter of fact, let me correct that. In  
18 Ahlberg, the Ahlberg vehicle -- I'm confusing this with  
19 another case and I have a lot of cases in my head and I  
20 apologize. Ahlberg was actually a Dodge truck, but I did  
21 testify in minivan cases of similar ilk, but in Ahlberg, it  
22 was a Dodge truck that did not have the interlock shift.  
23 It was a death case.

24 Q. You were retained by the plaintiff or the  
25 defendant or someone else?



## SHERIDAN

1 A. I was retained by the plaintiff.

2 Q. Can you tell us about the Kline, K-l-i-n-e,  
3 versus Lomans (sic), L-o-m-a-n-s, Auto Group case? That  
4 was in the New Jersey State Court.

5 A. That's still pending. It was ongoing. I was  
6 deposed in that matter last year, in June of 2012. I  
7 served as an expert in that case for almost four years. It  
8 involves the lack of rear crash worthiness of the Jeep  
9 Grand Cherokee fuel system. This was a fire death case  
10 that occurred back in 2009 -- excuse me; February of 2007.  
11 I believe the woman's name is Susan Kline, and she burned  
12 to death inside of the Jeep Grand Cherokee.

13 Q. You were retained on behalf of the plaintiff or  
14 the defendant?

15 A. The plaintiff.

16 Q. Have you yet been certified as an expert in the  
17 Kline case, to your knowledge?

18 A. I don't know that the Judge has certified me  
19 per se, but I have submitted my -- my expert report and  
20 there hasn't been any objections to my status as an expert  
21 in that matter.

22 Q. What type of expert are you serving as in the  
23 Kline case?

24 A. A general automotive safety management expert  
25 role.

## SHERIDAN

1 Q. Is there anything in the Kline case where your  
2 testimony has pertained to vehicle classifications?

3 A. Not directly.

4 Q. If we go to the Jones versus Chrysler Group case,  
5 what time period was that?

6 A. That was recent. I'm going to say 2011 or 2012.

7 Q. Were you certified as an expert in any court  
8 proceedings in that case?

9 A. No.

10 Q. Did you submit an expert report or affidavit?

11 A. Yes.

12 Q. What type of expert were you serving as?

13 A. As a general automotive safety management expert.

14 Q. Can you just tell us briefly what that case was  
15 about?

16 A. That was a seat back failure case. It involves  
17 Safety Regulation 207. It was a seat back failure case in  
18 a rear-end collision.

19 Q. With respect to any part of your testimony in the  
20 Jones case, did it pertain to vehicle classification?

21 A. No.

22 Q. Have you been certified as an expert in anything  
23 other than general automotive safety management?

24 A. No.

25 Q. Have you submitted any expert reports or

## SHERIDAN

1 testimony in the capacity of anything other than as a  
2 general automotive safety management expert?

3 MR. BROWN: Objection.

4 You can answer.

5 A. Can I hear the question, again, Counselor?

6 Q. Have you submitted any testimony in any of the  
7 cases that you have appeared in where you have served in an  
8 expert capacity as something other than as a general  
9 automotive safety management expert?

10 A. Not in the strict safety category, but as a fact  
11 witness. I participated as a fact witness from time to  
12 time, but the answer to your question is no.

13 Q. You participated as a fact witness for something  
14 other than your knowledge as a general automotive safety  
15 management expert; is that correct?

16 A. In litigation that was prior to my certification  
17 in Mohr.

18 Q. When?

19 A. It would have been during the time period from  
20 1995 through 2005, where I was primarily a fact witness.

21 Q. How many cases did you serve as such a witness  
22 in?

23 A. Twenty.

24 Q. Can you provide an example?

25 A. Um, I was a fact witness in a case of Matthews

## SHERIDAN

1 versus Chrysler. I was deposed in that case as a fact  
2 witness. Matthews was a lift gate latch failure death  
3 case. Matthews occurred in Texas, and I was -- I was  
4 participating on behalf of the plaintiff.

5 Q. In any of the cases where you have served as a  
6 fact witness, did you testify on behalf of a party other  
7 than the plaintiff?

8 A. No.

9 Q. Did any of those cases where you have served as a  
10 fact witness involve your knowledge of vehicle  
11 classifications?

12 A. Yes.

13 Q. Can you provide us with an example?

14 A. Another case that I have testified at trial as a  
15 fact witness was, um, Jiminez, and that's spelled  
16 J-i-m-i-n-e-z. Jiminez was another lift gate latch failure  
17 case where in a minor collision, the lift gate failed and  
18 the door opened and an eight-year-old boy was ejected and  
19 he died at the scene.

20 And in that particular matter, because the  
21 minivan was submitted as a truck, it did not comply with  
22 passenger car safety standards, and that was an issue for  
23 the jury's consideration.

24 Q. And did the testimony that you provided pertain  
25 to the vehicle classification?

## SHERIDAN

1 A. In part, yes.

2 Q. What year was that?

3 A. Jiminez would have been in 1998.

4 Q. A child was killed in that case; is that correct?

5 A. I'm sorry?

6 Q. You testified at trial in the Jiminez case?

7 A. Yes.

8 Q. Do you know if there was a verdict in that case?

9 A. Yes.

10 Q. What was the verdict?

11 A. It was compensation of 12.5 million and a  
12 punitive charge by the jury of \$250 million. So the total  
13 verdict was \$260 million.

14 Q. Are you aware if any of the questions that were  
15 reached by the jury had to do with vehicle classification  
16 in that case?

17 MR. BROWN: Objection. Lack of foundation.

18 A. I was not privy to the jury discussions,  
19 Counselor.

20 Q. Have you ever been disqualified as an expert in  
21 any of the cases that you have testified in?

22 A. There was an instance in Kansas where I was  
23 designated incorrectly by the plaintiff, and I was  
24 eliminated from the case in that matter.

25 Q. When was that?

## SHERIDAN

1 A. Approximately, 1996.

2 Q. What do you mean when you say that you were  
3 designated incorrectly?

4 A. The plaintiff had incorrectly identified me as a  
5 seat engineering expert, and upon examination, the  
6 defendant established that I had not engineered the seat  
7 per se. And, therefore, the strict designation by the  
8 plaintiff was incorrect and I was eliminated on that basis.

9 Q. Are there any other cases where you were  
10 disqualified as an expert?

11 A. Not that I recall.

12 Q. Were there any other cases where you testified  
13 where you know that a party has moved to have you  
14 disqualified as an expert?

15 A. There were several where those attempts were  
16 made, yes.

17 Q. About how many?

18 A. Two or three.

19 Q. Those are cases where you have served as an  
20 expert in general automotive safety management?

21 A. No. Since being certified, there has never been  
22 a challenge to that role. The cases that I mentioned were  
23 prior to that.

24 Q. Those are cases where you have served as a fact  
25 witness?

## SHERIDAN

1 A. Yes.

2 Q. When did you first become engaged in this case,  
3 the Taxis For All Campaign, which was previously known as  
4 Noel, N-o-e-l?

5 A. I'm approximating. I want to say, um, May of  
6 this year.

7 Q. And are you being paid for your testimony in this  
8 case?

9 A. Not by the plaintiff.

10 Q. Are you being paid by someone else?

11 A. It's my understanding that time in depositions is  
12 billed to the defendant. That is my understanding. So the  
13 strict answer is -- I guess the strict answer is I'm  
14 billing because that's a matter of the process.

15 Q. When you say you are billing, you mean that you  
16 keep billing records?

17 A. Well, my understanding is that the number of  
18 hours that I participate in this deposition is billable to  
19 the defendant. So, you know, we are here for seven hours,  
20 so that will be seven hours.

21 Q. Have you submitted any bills or invoices to the  
22 plaintiff for your role in this case?

23 A. Expenses, yes.

24 Q. What type of expenses?

25 A. Strictly travel and some clerical items, such as

## SHERIDAN

1 telephone calls, scanning or things like that, Fed Ex  
2 transportation charges. Um, hotel stays. Subway transit  
3 ticket.

4 Q. Have you been paid by the plaintiff?

5 A. Yes. I have been reimbursed, yes.

6 Q. I will direct your attention to paragraph 16 of  
7 the Declaration. The page is in front of you. You state  
8 on the second line, I will waive my expert fees in this  
9 matter and provide my time pro bono for all work other than  
10 deposition or trial testimony; is that correct?

11 A. Yes. That's correct, yes.

12 Q. And this does not indicate that you will be  
13 seeking reimbursement from the plaintiffs for those  
14 expenses?

15 MR. BROWN: It does not say that he is not,  
16 either.

17 A. It does not state that I'm being reimbursed for  
18 expenses. No, it doesn't call that out.

19 Q. Do you know how it is that you came to be in  
20 contact with the plaintiffs in this matter?

21 A. Yes. In that May or June time frame, I received  
22 a telephone call from Mr. Clarence, D-i-t-l-o-w, Ditlow.  
23 He is the director at the Center for Auto Safety in  
24 Washington, D.C. I've worked with Mr. Ditlow since 1994. I  
25 am personally well-known to him, and he indicated to me



## SHERIDAN

1 that he had received a telephone call from Mr. Sid  
2 Wolinsky.

3 MR. BROWN: I just want to interrupt you and  
4 just caution the witness that while this  
5 testimony is okay, I will warn you that  
6 discussions between you and your attorneys and  
7 you and someone else on behalf of an attorney  
8 would be privileged. I would object.

9 Q. Can you continue with your response?

10 A. Mr. Ditlow indicated that he had recommended to  
11 Mr. Wolinsky that he, Mr. Wolinsky, contact me. So  
12 Mr. Ditlow was giving me an alert of a contact from  
13 Mr. Wolinsky.

14 Q. Were you unaware or had you heard of this case  
15 prior to your contact with Mr. Ditlow?

16 A. Not this case, no.

17 Q. What do you mean by "not this case"?

18 A. When you say "case," I'm interpreting it to mean  
19 litigation. I was not aware of this case prior to his  
20 call.

21 Q. Were you aware of the issues that are in  
22 litigation?

23 A. When I was -- what I was aware of was a press  
24 release done by a Mr. Liu, only because I was canvassing  
25 the news and I was aware that there was a Taxi of Tomorrow,

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1 but specific litigation items, I was not aware of that.

2 Q. When did you become aware of the press release  
3 from Mr. Liu?

4 A. That could have been contemporaneous with when it  
5 occurred. I'm thinking of December of last year.

6 Q. Did you ever contact a City official about the  
7 Taxi of Tomorrow?

8 A. I believe I wrote a letter to Mr. Liu. I sent a  
9 letter to him. In the letter, I indicated to him that the  
10 Taxi of Tomorrow should accommodate wheelchair and  
11 handicapped folks. It is a two-page letter. I have not  
12 looked at it since January, but I did send a letter to him.

13 Q. What was the purpose of the letter to Mr. Liu?

14 A. Well, in the press release, Mr. Liu had indicated  
15 that he was not going to execute the contract or the budget  
16 or some financial execution was not going to be executed.  
17 And I sent him a letter in support of portions of his press  
18 release, indicating that there was no coverage for  
19 handicapped analysis supporting his issue at the  
20 handicapped level on that.

21 Q. Did you offer to provide any services to Mr. Liu  
22 in support of his position?

23 A. No.

24 MS. GOLDBERG-CAHN: Mark that.

25 (Whereupon, the aforementioned document was

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1 marked as Defendants' Exhibit 2 for  
2 identification as of this date by the Reporter.)

3 Q. Do you recognize this document (handing)?

4 A. Yes.

5 Q. What is this?

6 A. This is the letter that I just mentioned  
7 regarding my contact with Mr. Liu subsequent to his press  
8 release. It is dated the 17th of December of 2012.

9 Q. If I could turn your attention to the bottom of  
10 the page that's marked as page 2 of 3.

11 A. Yes.

12 Q. The third sentence states, But one important  
13 "official" issue will be the affect my testimony will have  
14 on a New York jury after a disabled person is robbed or  
15 injured while waiting in an extended que, q-u-e, (on a New  
16 York City street), due to minimal/zero availability of  
17 accommodating transport and the jury's recognition that  
18 that issue was essentially resolved in 1991.

19 Can you explain what that sentence means?

20 A. Well, back in 1991, I had called meetings within  
21 Chrysler, the minivan operations group in particular, to  
22 accommodate the needs of the handicapped transport retrofit  
23 suppliers, and this occurred in 1991.

24 So it was my role as the product planning manager  
25 to assist the outside world in their efforts to provide

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1 access for handicapped transport. So when I say  
2 "essentially resolved," where I'm headed is that, you know,  
3 the issue of providing access for the handicapped was  
4 something that we discussed all the way back in 1991, not  
5 only discussed it, but took action at the engineering level  
6 to accommodate that issue.

7 Q. What did you mean by "the jury's recognition"?  
8 Is that referring to something from 1991?

9 A. No. That would have been contemporaneous to some  
10 hypothetical situation in the future.

11 Q. In that sentence, One important "official" issue  
12 will be the affect my testimony will have on a New York  
13 jury, what did you mean by that?

14 A. What I'm referring to is the fact that the  
15 industry recognizes the need to provide any handicapped  
16 transport or accommodate any handicapped transport and that  
17 the industry has recognized it at least with respect to my  
18 ability to testify since 1991.

19 Q. Were you offering to Mr. Liu to provide testimony  
20 on this issue?

21 MR. BROWN: Objection. The document speaks  
22 for itself.

23 A. I can see how one would interpret it that way,  
24 and I would not offer much rebuttal at that level, because  
25 it does appear that I'm offering to testify.

## SHERIDAN

1 Q. Did you ever hear from Mr. Liu or anyone from his  
2 office in response to this letter?

3 A. No, never.

4 Q. The next page of the document, page 3 of 3, this  
5 is a courtesy copy list.

6 Did you ever hear from any of the people on the  
7 courtesy copy list in response to this letter?

8 A. No.

9 Q. Didn't you say that you were contacted by  
10 Mr. Ditlow, Clarence Ditlow, on this matter?

11 A. Your question was specific to this letter, but I  
12 didn't hear from Mr. Ditlow in response to this letter.

13 Q. Did you hear from Mr. Ditlow in response to this  
14 issue about the accessibility?

15 A. I don't recall that specific issue being brought  
16 up when he alerted me to an upcoming call from  
17 Mr. Wolinsky.

18 Q. Did you hear from anyone at the United Spinal  
19 Association in response to this letter?

20 A. No.

21 Q. Did you hear from anyone from the United Spinal  
22 Association on the matter of this issue, the Taxis For All  
23 Campaign?

24 A. In general? Is that your question, Counselor?

25 Q. Yes.

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1           A.       I believe a United Spinal Association person was  
2           at the mediation and I attended the mediation. I believe  
3           that a person was there, but I could be mistaken, because I  
4           didn't take business cards.

5           Q.       What mediation?

6           A.       The mediation three weeks ago.

7           Q.       In what case?

8           A.       In this case.

9           Q.       You were present at the mediation in this case?

10          A.       Yes.

11          Q.       Were you in the room with the plaintiff?

12          A.       Yes.

13          Q.       Did you meet with the mediator?

14          A.       The mediator came into our room.

15          Q.       Did you meet with anyone from the defendants?

16          A.       No.

17          Q.       That was in or about August of 2013?

18          A.       Yes.

19          Q.       Did you hear from anyone from the City of New  
20          York in response to this letter?

21          A.       No, I don't believe so.

22          Q.       Or anyone from the New York City Taxi and  
23          Limousine Commission?

24          A.       I don't believe so, no.

25          Q.       Have you ever heard from anyone from the City of

## SHERIDAN

1 New York involving the issue of the Taxi of Tomorrow?

2 A. No.

3 Q. Anyone from the TLC on that issue?

4 A. No.

5 Q. So I would like to direct your attention back to  
6 the report, which is Defendants' Exhibit 1, the  
7 Declaration. Paragraph 17, the second sentence in the  
8 middle of it says, I reviewed the specifications of the  
9 Nissan NV200 vehicle in detail.

10 What did you look at?

11 A. I looked at many materials.

12 I apologize for the typo there.

13 Q. What typo?

14 A. There should two S's in Nissan.

15 I reviewed the Body Builder's Guide. I reviewed  
16 Nissan website materials. Up to the signing of this  
17 Declaration, I personally inspected four to five NV200  
18 vans. I personally drove one.

19 Q. Four to five?

20 A. I personally inspected four to five different  
21 NV200 vans. I drove one. I was doing or making  
22 comparisons between this vehicle and other vans and other  
23 vehicles that are available or were available.

24 It's a lot of material in preparation for the  
25 Declaration.

## SHERIDAN

1 Q. You mentioned a Body Builder's Guide?

2 A. Yes.

3 Q. Which Body Builder's Guide did you look at?

4 A. It was the Nissan NV200 and, I believe, it is the  
5 Cargo Van Body Builder's Guide.

6 Q. Did you review the Vehicle Supply Agreement  
7 between Nissan and the City of New York for vehicle  
8 specifications?

9 A. I believe I've seen a copy of it. That document  
10 sounds familiar.

11 Q. You said that you test drove an NV200 vehicle; is  
12 that correct?

13 A. Correct.

14 Q. Where?

15 A. Syracuse, New York.

16 Q. Was that at a Nissan dealer?

17 A. Yes.

18 Q. What do you mean by you test drove the vehicle?

19 A. I was accompanied by the commercial sales manager  
20 and we took out an NV200 vehicle. We were out in it for  
21 almost an hour. We drove all around the countryside and  
22 the city streets of Syracuse.

23 Q. Was that an NV200 Taxi that you drove?

24 A. No. It was an NV200 Cargo Van.

25 Q. When you said that you saw, when you said that



## SHERIDAN

1 you inspected, approximately, four to five NV200s, were any  
2 of those NV200s taxis?

3 A. No.

4 Q. They were cargo vehicles?

5 A. Yes.

6 Q. Where did you see the four to five vehicles?

7 A. That was the only location that I inspected them,  
8 in Syracuse.

9 Q. Why did you look at more than one NV200 Cargo  
10 vehicle at the dealer in Syracuse?

11 A. There were different configurations and different  
12 equipment levels within each of those that were on display  
13 at the dealership. So I inspected and I photographed all  
14 of them, but I only test drove one of them.

15 Q. Do you know which configuration?

16 A. Um, it was the -- of the five that were on  
17 display, it was the one that had the most equipment. That  
18 was the one that the commercial sales manager wanted me to  
19 test drive. I believe he wanted to impress me with the  
20 vehicle.

21 Q. Did the salesperson believe you to be there for a  
22 potential sale of the vehicle?

23 A. Yes.

24 Q. He did not know what your purpose was in  
25 inspecting the NV200 vehicle?

## SHERIDAN

1 A. No.

2 Q. You mentioned before the Vehicle Supply  
3 Agreement.

4 MS. GOLDBERG-CAHN: If we could mark this as  
5 Defendants' Exhibit 3, the Vehicle Supply  
6 Agreement.

7 (Whereupon, the aforementioned document was  
8 marked as Defendants' Exhibit 3 for  
9 identification as of this date by the Reporter.)

10 Q. I'm showing you what has been marked as  
11 Defendants' Exhibit 3 (handing). It is entitled: Vehicle  
12 Supply Agreement, NYC Taxi of Tomorrow, dated October 9,  
13 2012, between Nissan Taxi Marketing, N.A., LLC and the City  
14 of New York.

15 Have you ever seen this document before?

16 A. No. Now that I'm looking at it, I was looking at  
17 it as you were preparing it for an exhibit marker. I don't  
18 believe that I've seen this document. We have discussed  
19 it. I've discussed it with Mr. Wolinsky and Ms. Pinover,  
20 but I have not looked at this actual document, at least not  
21 that I think so. In a nutshell, I don't recognize this  
22 front cover.

23 Q. Unfortunately, it is not paginated very well, but  
24 if I could direct your attention -- it is paginated through  
25 page 71 and then you will see an Appendix A and then the

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1 next page, Appendix B, Appendix B, vehicle specification.

2 Have you ever seen this document or a portion of  
3 this document before?

4 A. I don't believe so, Counselor.

5 Q. If you could turn to Exhibit 1, which is the  
6 Declaration that was submitted. Exhibit H is towards the  
7 end.

8 Materials reviewed in preparation of expert  
9 Declaration, on that first page, about ten items down, it  
10 states that you reviewed the Vehicle Supply Agreement in  
11 preparation for your Declaration; is that correct?

12 A. It is listed here, yes, but I do not remember  
13 looking at this document.

14 MR. BROWN: Is this a copy of the document  
15 that the City has Bates Stamped with the Bates  
16 numbers indicated?

17 MS. GOLDBERG-CAHN: This is a copy of the  
18 document that was produced. This particular copy  
19 does not have the Bates-Stamped numbers copied on  
20 it. We have some technical issues regarding  
21 that.

22 Q. If I could direct your attention back to  
23 Exhibit A, paragraph 17 of the third sentence, I also  
24 reviewed the specifications of the variation of the NV200  
25 to be used as a Taxi of Tomorrow.

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1 A. Yes.

2 Q. What did you look at?

3 A. This would have been dimensional specifications;  
4 in other words, dimensional, as well as some of the content  
5 that's included with the Taxi of Tomorrow version.

6 Q. What documents, if any, did you look at to review  
7 the specifications of the variation of the NV200 to be used  
8 as a Taxi of Tomorrow?

9 A. In the TOT analysis that I did, it was primarily  
10 website documents that were available.

11 Q. What type of website documents?

12 A. Um, there are what I recall both You Tube  
13 discussions about the vehicle, what its content was, and  
14 there was a website that I visited that discussed the  
15 details of the TOT. And I can't recall what that was.

16 Q. Did any of those discuss the dimensions of this  
17 TOT? Just for clarity of the record, TOT is referring to  
18 the Taxi of Tomorrow.

19 A. I do recall that the dimensional analysis was the  
20 same. That was one of the points that I made. There was  
21 no major additions of wheelbase or anything of that nature  
22 between the cargo van and the TOT. That was one of the  
23 purposes of my investigation. That was to make sure that  
24 the broad specifications were the same.

25 Q. And this is based upon your review of websites

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1 that referenced the dimensions of the Taxi of Tomorrow  
2 vehicle?

3 A. Yes.

4 Q. Why don't we look at Exhibit H to Exhibit 1,  
5 which is the Declaration, the materials reviewed. If you  
6 could take a look at that.

7 Can you point to us which website documents you  
8 reviewed that had specifications for the Taxi of Tomorrow  
9 vehicle?

10 A. I don't believe it's the -- I don't believe that  
11 the websites are listed here, Counselor.

12 Q. Is there anything in the materials reviewed of  
13 Exhibit H of your Declaration that pertains to  
14 specifications for the NV200 Taxi to be used as the Taxi of  
15 Tomorrow?

16 A. Well, in general, because the two vehicles do not  
17 have any dimensional differences of major import, things  
18 such as -- well, the NV200 London Taxi Detail, I believe  
19 they're the same as the TOT and some of the other -- I'd  
20 have to go over this in detail. Again, Counselor, in my  
21 analysis of the Taxi of Tomorrow and the cargo version, the  
22 broad dimensionalities were the same.

23 Q. You can't point to any documents or materials  
24 that set forth the Taxi of Tomorrow and the NV200 vehicle?

25 A. No, not at the time of the Declaration. It was

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1 afterwards that I was able to look at the Body Builder's  
2 Guide for the taxi version.

3 MS. GOLDBERG-CAHN: Can we have this marked  
4 as Exhibit 4?

5 (Whereupon, the aforementioned document was  
6 marked as Defendants' Exhibit 4 for  
7 identification as of this date by the Reporter.)

8 Q. I will show you what is marked as Defendants'  
9 Exhibit 4. It is called Nissan NV200 NYC Taxi  
10 Specifications (handing).

11 Have you ever seen this document before?

12 A. I've seen -- no, I'm not sure if I've seen this  
13 specific document, but this type of information, I believe,  
14 is in the Body Builder's Guide for the taxi, but this  
15 specific document, I don't believe that I've seen it.

16 Q. Can you tell me -- I would like to direct you to  
17 Defendants' Exhibit 1, Exhibit H of that, page 3 of 5 --  
18 when you referenced in the materials that you reviewed in  
19 preparation of your Declaration the Nissan NV200 NYC Taxi  
20 Specifications, and then there's some Bates-Stamped numbers  
21 referenced there, what were you referring to?

22 A. This would have been a document that contained  
23 information that was relayed to me by the plaintiffs,  
24 because I don't believe that I've seen that document  
25 before.

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1 Q. So you did not see the document identified as  
2 Nissan NV200, Bates Stamped NYCE2013-0003464; is that  
3 correct?

4 MR. BROWN: Objection. Lack of foundation.  
5 Without putting that document in front of him, I  
6 see that as being unfair.

7 MS. GOLDBERG-CAHN: We can bring him back.

8 MR. BROWN: Then you have his answer.  
9 Otherwise, I do object. I don't know what that  
10 Bates-Stamped number is.

11 Q. So you don't recall seeing a document like  
12 Defendants' Exhibit 4 before?

13 A. Well, reviewing it or seeing it? I'm sorry,  
14 Counselor.

15 Q. What is the difference between reviewing or  
16 seeing the document?

17 A. Well, if someone relays the information on a  
18 document to me, I'm reviewing it. So I believe that the  
19 dimensionalities of the document were relayed to me by the  
20 plaintiffs' counsel. I believe in this particular case, it  
21 was Mr. Wolinsky.

22 So I became aware of it in that context and I  
23 reviewed it. I don't believe that I have seen this actual  
24 document.

25 Q. I want to direct your attention back to

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1 Defendants' Exhibit 1, paragraph 33, approximately, ten  
2 pages in. The cite in the first line, second sentence  
3 says, NV200 Compact Cargo Specifications website.

4 What are you referring to here?

5 A. This is a page on the Nissan commercial vehicles  
6 dot com website.

7 Q. Is this the Body Builder's Guide that you said  
8 that you had reviewed?

9 A. No, I don't believe so. I believe if you go to  
10 the Nissan commercial vehicles dot com website, there are  
11 hyperlinks to pages within that website, and that's what  
12 I'm referring to here.

13 Q. If I could direct you back to paragraph 26,  
14 page 7, One of the most important documents in my review of  
15 this vehicle was the 2013 NV200 Compact Cargo Body  
16 Builder's Guide.

17 You reviewed the Body Builder's Guide; is that  
18 correct?

19 A. That one I downloaded, yes, and I made a copy.

20 Q. And that was for the compact cargo?

21 A. At the time, the TOT Body Builder's Guide was not  
22 available, but that one was. The Compact Body Builder's  
23 Guide was available. So, yes, I reviewed it and I  
24 downloaded it and I have a hard copy of that.

25 Q. Did you look for the Taxi Body Builder's Guide?



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1 A. Yes.

2 Q. When?

3 A. This would have been in the August time frame.

4 Q. Did you ask Nissan for a copy of the Taxi Body  
5 Builder's Guide?

6 A. No. I have had no contact with Nissan, other  
7 than website visitations.

8 Q. And the dealership?

9 A. Well, the dealership is not Nissan, but the  
10 answer is no, I've had no contact.

11 Q. Did you ask anyone for a copy of the Taxi Body  
12 Builder's Guide?

13 A. Yes.

14 Q. From who?

15 A. I asked the plaintiffs if they could get me the  
16 Taxi of Tomorrow Body Builder's Guide and, eventually, they  
17 did.

18 Q. At the time that you signed your Declaration, I  
19 believe, it was August 27th of 2013, were you aware that a  
20 copy of the Taxi Body Builder's Guide would be made  
21 available to you?

22 A. Well, as a matter of course, I would expect the  
23 Body Builder's Guide to be generally available. So the  
24 answer, in general, is, yes, but when I had searched and I  
25 was looking for a Body Builder's Guide or anything

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1 published by Nissan, there was nothing that was giving me  
2 the level of detail that the Cargo Van Body Builder's Guide  
3 was giving.

4 So the answer is, in general, yes, I was  
5 expecting that, but at the time of the signing of the  
6 Declaration, it was not available to me.

7 Q. Did you review the deposition testimony of the  
8 TLC witnesses, Deputy Commissioner Chhabra, C-h-h-a-b-r-a,  
9 and/or David Klahr, K-l-a-h-r, in preparation of your  
10 Declaration, which is Exhibit A?

11 A. The review of their testimony was relayed to me  
12 by the plaintiffs' counsel. I didn't read the deposition  
13 transcripts.

14 Q. Were you aware that the deposition transcripts  
15 made reference to an NV200 Taxi Body Builder's Guide?

16 A. I don't recall.

17 Q. Were you aware that counsel for the plaintiffs  
18 requested a copy of the NV200 Taxi Body Builder's Guide  
19 from the City of New York?

20 A. Eventually, I was aware of it, yes.

21 Q. At the time that you signed the Declaration on  
22 August 27, 2013, were you aware of that?

23 A. No.

24 Q. When you say that counsel for the plaintiffs  
25 relayed deposition transcript testimony to you, what does

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1 that mean?

2 A. In other words, I was told of the portent of  
3 their testimony with respect to that particular entry in  
4 the Declaration. I was told that that testimony had  
5 occurred.

6 Q. Did they read you lines from the testimony?

7 A. No.

8 Q. Did they read you quotes from the testimony?

9 A. No.

10 Q. Direct your attention to paragraph 33 of  
11 Exhibit A of the Declaration. The fourth line down,  
12 Testimony from defendant witnesses confirmed that the NV200  
13 Taxi also has this feature, Klahr, 30(b)(6) Tr. at 53:13-18  
14 (testimony that the NV200 Taxi has sliding doors on both  
15 panels.)

16 Chhabra Tr. at 15:24-25, 16:1-7 (testimony that  
17 the NV200 Taxi has sliding doors on both panels).

18 Where did you get those transcript cites from?

19 A. That would have been relayed to me by the  
20 plaintiffs' counsel.

21 Q. You never read any testimony from Klahr  
22 indicating that the NV200 Taxis have sliding doors on both  
23 panels; is that correct?

24 A. To the best of my recollection, I didn't read the  
25 transcripts. The content and the portent of the transcript

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1 was relayed and read to me by the plaintiffs' counsel.

2 Q. How do you know that this was true?

3 A. I relied on the plaintiffs' counsel's integrity.

4 Q. I direct your attention to paragraph 27 of  
5 Exhibit A of the Declaration. The first line, A Body  
6 Builder's Guide is a standard document in the automotive  
7 industry that many companies create for every model, year,  
8 and make on the market. The document is free of charge to  
9 the public. It is a definitive guide that provides every  
10 measurement and specification for every aspect of a  
11 vehicle, from body dimensions down to bolts and fuses that  
12 a mechanic or engineer could require.

13 What is the basis for your statement that a Body  
14 Builder's Guide is a definitive guide that provides every  
15 measurement and specification for every aspect of a  
16 vehicle?

17 A. In my experience, the Body Builder's Guides that  
18 I have reviewed over many years provide just about every  
19 piece of information that anyone who is going to be doing  
20 modifications to the vehicle would need and must rely on.

21 Some Body Builder's Guides are more complete than  
22 others and more thorough than others, but by definition,  
23 the Body Builder's Guide is supposed to have everything  
24 that anyone could need to make extensive modifications to  
25 and rely on that Body Builders need for that purpose.

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1           So what I will say at this point is that every  
2 measurement and specification is a little broad in that the  
3 Body Builder's Guide does not specify the integrative chip  
4 that's used in the body controller computer, and someone  
5 may need that information, but at the level of the Body  
6 Builder process, just about everything is provided in that  
7 particular document.

8           Again, some Body Builder's Guides from some  
9 companies are more thorough than others. So it is a range  
10 of things that can occur.

11         Q.       Did Chrysler provide Body Builder's Guides for  
12 the vehicles in the time that you have worked on them at  
13 Chrysler?

14         A.       Yes.

15         Q.       Did they produce Body Builder's Guides for every  
16 model of vehicle that you have worked on in your eleven  
17 years at Chrysler?

18         A.       For the vehicles that I worked on, yes.

19         Q.       Are there vehicles that you did not work on that  
20 you are of that Chrysler did not produce Body Builder's  
21 Guides for?

22         A.       I'm not aware of any, but there may be, but I'm  
23 not aware of any.

24         Q.       Can you tell me what you mean by some Body  
25 Builder's Guides are more extensive than others?

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1           A.       When I compared the Nissan Body Builder's Guides  
2       to what I recall on the full-sized Dodge Truck Body  
3       Builder's Guide, by virtue of the volume of the pages  
4       alone, Nissan is still developing their Body Builder's  
5       Guides for this relatively new product in their product  
6       lineup.

7           Q.       Which Body Builder's Guide are you referring to;  
8       the Taxi NV200 or the Cargo NV200?

9           A.       I'm speaking with a little more definition about  
10      the Cargo Body Builder's Guide, because just recently I  
11      acquired the Taxi Body Builder's Guide, but in my  
12      experience in the time I've been in the industry, Body  
13      Builder's Guides are iterative and they're evolutionary.  
14      And through time with the interaction with the  
15      retrofiters, more and more information is added because  
16      there may be times when a Body Builder's Guide does not  
17      have a dimension or a specification that someone needs and  
18      they will contact the manufacturer and ask for that.

19                    So over time, the document evolves and it could  
20      be, for lack of a better term, the Bible of the vehicle.

21          Q.       You were just talking about comparing the NV200  
22      Body Builder's Guide to a Dodge Body Builder's Guide? I  
23      want to understand.

24          A.       I was recalling the Body Builder's Guide that I  
25      reviewed while working at Chrysler on the full-sized Dodge

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1 pick-up truck and one of the Body Builder's Guides that I  
2 worked on personally was the one for the -- for the one  
3 that involved the Dodge Cummins Pick-Up Truck.

4 Q. And is it your testimony that the Dodge Cummins  
5 Pick-Up Truck Body Builder's Guide is more extensive than  
6 the one that you read for the NV200 Cargo?

7 A. Yes.

8 Q. Can you explain what you mean by "more  
9 extensive"?

10 A. It contained more information, primarily because  
11 it was a more complex product and the Body Builder's Guide  
12 that would need information for the complexity are more  
13 voluminous. So the Body Builder's Guide for the Dodge  
14 pick-up truck, um, as a result of the product complexity  
15 was more voluminous compared to this vehicle, which is a  
16 fairly simple vehicle. It is not a very complex vehicle.  
17 So the Body Builder's Guide by definition is not as  
18 voluminous.

19 Q. Is it your testimony that the Body Builder's  
20 Guide that you reviewed for the NV200 Cargo provides every  
21 measurement and specification for every aspect of the  
22 vehicle?

23 A. At this point, it does not. At this point, we  
24 are in the evolutionary stage. So this statement, it is a  
25 little strong, saying that it provides every measurement

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1 and every specification.

2 Q. So I would like to direct your attention to  
3 paragraph 27 of Exhibit A, five lines down, Because the  
4 Body Builder's Guide is a complete and authoritative  
5 description of a vehicle that is created and maintained by  
6 the vehicle designer and manufacturer, it is a document  
7 that can be relied on as an accurate, objective, and  
8 complete description of the vehicle.

9 Do you believe this statement is accurate with  
10 respect to the NV200 Cargo Body Builder's Guides that you  
11 reviewed?

12 A. Well, the statements made in context of the task  
13 that I was given, and at this point, it is an accurate  
14 statement with respect to what I was required to do. At  
15 this point in time, I don't need any more information than  
16 what was contained in this first version of the Body  
17 Builder's Guide. So it is authoritative enough for the  
18 purposes of this Declaration.

19 Q. What information would you seek to find in a Body  
20 Builder's Guide that was not contained in the NV200 Cargo  
21 Body Builder's Guide that you reviewed?

22 MR. BROWN: Objection.

23 A. There may be in the future or existing requests  
24 for modifications by the Body Builder's Guides themselves  
25 and depending on what information and/or modifications they



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1 are seeking to deploy. There may be major changes to  
2 overall vehicle size and specifications. So information  
3 that indicated that Nissan was going to accommodate major  
4 changes to the NV200, that would be of interest to me, but  
5 there's no indication at this time that is occurring, but  
6 that does not mean that it won't.

7 Q. When you say in paragraph 27 that a Body  
8 Builder's Guide is a definitive guide that provides every  
9 measurement and specification that a mechanic or an  
10 engineer could require, what do you mean by that?

11 A. This statement, um, is especially applicable to  
12 the mechanics. Most mechanics can rely on the Body  
13 Builder's Guide for the types of tasks that they are  
14 charged with. The engineer portion of that statement could  
15 be defined to reflect the fact that the engineer is  
16 participating in the generation of the document.

17 So the engineer per se needs a little bit more  
18 information and makes themselves, avails themselves to more  
19 information. But in terms of the relationship between the  
20 engineer and the Body Builders, the Body Builder's Guide is  
21 sufficient for the engineer and his relationship with the  
22 Body Builder who calls to the manufacturer and wishes to  
23 acquire information from the responsible engineer.

24 So at the time that the Body Builder's Guide is  
25 published, the engineer has everything in the document that

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1 they need to relate to and discuss Body Builder's Guide  
2 revisions with the Body Builders.

3 So at this point in time, it is a good document  
4 for the relationship between the outside Body Builders and  
5 the engineer that is responsible.

6 Q. But not the mechanic?

7 A. The mechanic, too, yes. I already stated that.  
8 That was my earlier answer.

9 Q. Was it your testimony that the Body Builder's  
10 Guide provided measurements for purposes of modifications  
11 of a vehicle? I think I heard you use that word before.

12 A. Yes. In other words, the Body Builder's Guide  
13 provides the information and the dimensionality that  
14 someone who is going to be modifying the vehicle for the  
15 specific market niche, they need to have that information,  
16 those specifications and those positional dimensionalities  
17 before they can make competent modifications to the  
18 vehicle.

19 Q. What types of modifications are you referring to  
20 when you talk about the market niche?

21 A. Well, Body Builders includes, for example, tow  
22 truck people. When we used to sell Dodge Cummins Pick-Up  
23 Trucks, we would send them a vehicle, which we called an  
24 incomplete vehicle configuration, IVC. It was specifically  
25 directed to Body Builders who in the example I am providing

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1 was going to turn the Dodge pick-up truck to a tow truck.  
2 So the Body Builders that do those modifications and  
3 replace the pick-up box with a tow hook, crane device used  
4 the Body Builder's Guide for the purposes of designing  
5 their retrofit to turn a Dodge pick-up truck to a tow  
6 truck.

7 In the NV200, there may be some Body Builders who  
8 are going to modify for a market purpose and they will need  
9 the information in the Body Builder's Guide before they can  
10 design their retrofit components.

11 Q. So it is true that you would not need a Body  
12 Builder's Guide if the vehicle is not going to be modified  
13 or retrofitted in any way?

14 A. Yes, but I'm not aware of any vehicle that goes  
15 into the marketplace that does not have the potential of  
16 being modified by somebody.

17 Q. Is it true that some manufacturers do not publish  
18 Body Builder's Guides?

19 A. There may be, but no prominent manufacturer does  
20 not provide Body Builder's Guides. So there may be some  
21 minor manufacturers in the world that do not provide Body  
22 Builder's Guides, but I'm not aware of them.

23 MS. GOLDBERG-CAHN: Can I have this marked  
24 as Defendants' Exhibit 5?

25 (Whereupon, the aforementioned document was

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1           marked as Defendants' Exhibit 5 for  
2           identification as of this date by the Reporter.)

3           Q.       I'm showing you a copy of what has been marked as  
4 Defendants' Exhibit 5, entitled the 2013 NV200 Compact  
5 Cargo Body Builder's Guide. I represent that this was  
6 taken from Exhibit B to the first exhibit, which is your  
7 Declaration that was appended thereto (handing).

8                   Have you seen this before?

9           A.       I've seen a version of this before. The reason  
10 that I say that, it seems that the one that I downloaded,  
11 it seems to be smaller, but in general, I've seen this.

12          Q.       Can you point to me anywhere in the NV200 Cargo  
13 Body Builder's Guide where there's information for  
14 mechanics to perform repairs?

15          A.       Where mechanics could be using this to perform  
16 repairs?

17          Q.       Yes. I'm taking that from paragraph 27 of your  
18 Declaration. Starting with the fourth line, it has every  
19 measurement and specification that a mechanic or engineer  
20 could require.

21          A.       The reason that I'm being pensive, Counselor, is  
22 because I'm not sure that I understand where the word  
23 "repair" comes into this. I can try, but I was not  
24 referencing repairs for mechanics.

25          Q.       Or that a mechanic could require.

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1           A.       Well, the entire document, Body Builder's Guide,  
2       the people who modify vehicles employ mechanics. So the  
3       entire document would be responsive to your question. The  
4       reason that I'm being specific is because repairs is a  
5       different process than Body Builder activity.

6           Repair might include what happens at a dealership  
7       during the changing of oil or fixing the transmission. So  
8       that type of information may not be in the Body Builder's  
9       Guide in terms of the word that you used, repair.

10          Q.       So that am I understanding correctly, there may  
11       not be information in the Body Builder's Guide that would  
12       be relevant for a mechanic to perform an oil change; is  
13       that correct?

14          A.       In other words, the repair portion of the  
15       automotive industry relies on the service manual, which is  
16       another document that is published by the manufacturer.  
17       The Body Builder's Guide is for mechanics and engineers to  
18       use for purposes of making modifications to the body.  
19       That's why extensively, we refer to it as a Body Builder's  
20       Guide because they're building on the body.

21          Q.       Isn't it true that there's nothing in the Body  
22       Builder's Guide that would show where the -- I'm sorry for  
23       this technical logo -- where the compartment of the oil  
24       tank would be?

25          A.       We refer to it as an oil pan. The specification

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1 of the oil pan and the drain plug as we call it, more than  
2 likely is not in the Body Builder's Guide, and the changing  
3 of oil is a maintenance and repair issue. Whereas the  
4 context of paragraph 27 by the use of the word "mechanic"  
5 refers to the mechanics that would be making modifications,  
6 not necessarily repair.

7 Q. You gave changing a transmission as an example of  
8 a mechanic's repair before; is that correct?

9 A. Yes.

10 Q. And so there's nothing in the Body Builder's  
11 Guide that would indicate where the transmission is for  
12 purposes of such a repair?

13 A. No. The Body Builder's Guide will tell you the  
14 location of a major component, but in terms of the details  
15 for repair, that is not the purpose of the Body Builder's  
16 Guide.

17 Q. So it would not provide you the measurement for  
18 the transmission?

19 A. I don't know what you mean by measurement of a  
20 transmission.

21 Q. The size of a transmission, that would be in the  
22 Body Builder's Guide?

23 A. It could be, but that does not necessarily relate  
24 to repair. Again, the dimensionality is something that the  
25 Body Builder's Guide will contain. So in general, in

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1 answer to your question, the answer is yes.

2 Q. So is every bolt and fuse that's contained in a  
3 vehicle in the Body Builder's Guide?

4 A. Not every one.

5 MS. GOLDBERG-CAHN: Let's mark this as  
6 Exhibit 6.

7 (Whereupon, the aforementioned document was  
8 marked as Defendants' Exhibit 6 for  
9 identification as of this date by the Reporter.)

10 Q. I'm showing you a copy that has been marked as  
11 Defendants' Exhibit 6, the Body Builder's Guide Nissan  
12 Commercial Vehicles for the 2014 NV200 Taxi. This has  
13 Bates-Stamped number NYC-00013498 through 13498 on it.

14 MR. BROWN: For the record, I don't know  
15 what this is. This is how it was produced.

16 MS. GOLDBERG-CAHN: We will have to look  
17 into that.

18 MR. BROWN: There's a lot of confusion. I  
19 mean, you showed him a document that did not have  
20 Bates-Stamped numbers and you are saying that he  
21 did not see it and you are saying that it does  
22 have certain Bates-Stamped numbers, but it  
23 doesn't.

24 Q. We can call it the NV200 Taxi Body Builder's  
25 Guide. I will ask you if you have ever seen this document

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1 before (handing).

2 A. Yes.

3 Q. Approximately, when?

4 A. Yesterday.

5 Q. So after you had submitted your Declaration on

6 August 27, 2013?

7 A. Yes.

8 Q. That was the first time that you had seen this?

9 A. Yes.

10 Q. How did it come to be that you saw the NV200 Taxi  
11 Body Builder's Guide?

12 A. This was one of the documents that we reviewed  
13 yesterday.

14 Q. Have you had a chance to review this NV200 Body  
15 Builder's Guide?

16 A. Not completely, but I have reviewed it since  
17 receiving it.

18 Q. Does this differ from the NV200 Compact Cargo  
19 Body Builder's Guide that you reviewed in preparation for  
20 your deposition?

21 A. Yes.

22 Q. Can you describe for me how it is different?

23 A. Well, the range of information is a little  
24 different. It contains less information, I believe, than  
25 the Body Builder's Guide, because it's specific to the



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1 taxi. So it has a little bit less information. The other  
2 thing that was different that I was noting were the pages  
3 involving the vehicle identification numbers. I spent some  
4 time looking at what would be TOT BBG38, 39, and 40.

5 Q. When you just said that the NV200 Taxi Body  
6 Builder's Guide has less information compared to the other  
7 Body Builder's Guide, were you referring to the NV200  
8 Compact Cargo Body Builder's Guide?

9 A. Yes. I was particularly interested in the airbag  
10 deployment pages of this document. I reviewed those.

11 Q. Is there anything in the NV200 Taxi Body  
12 Builder's Guide that provides you with body dimensions of  
13 the NV200 Taxi?

14 A. I don't believe that it did and I don't believe  
15 that it does.

16 Q. Have you ever seen an NV200 Taxi?

17 A. Only on websites and You Tube vehicles. I've  
18 never actually been next to one. Although early on, I  
19 requested to inspect the NV200 Taxi of Tomorrow. I  
20 requested the plaintiff to make that available to me, if  
21 they could.

22 Q. And that never happened?

23 A. The availability never happened, no.

24 MS. GOLDBERG-CAHN: Now would be a good time  
25 to take a few minute break.

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1                   (Whereupon, a short recess was taken for ten  
2                   minutes.)

3       BY MS. GOLDBERG-CAHN:

4           Q.       I want to direct your attention to Exhibit A,  
5       Exhibit 1, which is your Declaration, paragraphs 20 and 21,  
6       under the Subheading A, General Characteristics for the  
7       Van.

8                   In paragraphs 20 and 21, you identified six  
9       characteristics that you state pertain to a van and three  
10      characteristics that you say are sometimes cited as van  
11      characteristics; is that correct?

12          A.       I will take a moment to review that, Counselor.  
13      Yes.

14          Q.       What is the basis for your identification of the  
15      characteristics set forth in paragraphs 20 and 21?

16          A.       My experience in the industry, as well as my  
17      specific work assignments on both full-sized vans and  
18      minivans.

19          Q.       Are these characteristics based upon any federal  
20      regulations or statutes that you have reviewed?

21          A.       Not necessarily -- well, yes and no in the  
22      following regard: Some of the regulations include  
23      definitions that carry this verbiage with them. Um,  
24      there's no regulation that says, you know, you must do this  
25      or that. But they are cited as characteristics within the

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1 body of, for example, the Transportation Safety Act. You  
2 can find definitions that are very similar to the criteria  
3 that I used in 20 and 21.

4 Q. Are all of the characteristics set forth in 20  
5 and 21 contained in the federal regulations that you cited?

6 A. Well, depending on the context of the regulatory  
7 discussions, yes, but are you referring strictly to in the  
8 context of a van?

9 Q. Yes.

10 A. Not necessarily, no.

11 Q. So this Section A is entitled: General  
12 characteristics of a van; is that correct?

13 A. Yes.

14 Q. What does that mean?

15 A. These are the characteristics that a person or an  
16 observer could expect to find in the process of evaluating  
17 what a vehicle is or is not. So the general  
18 characteristics refers to those structural or visual items  
19 that constitute or would help you identify the vehicle as a  
20 van.

21 Q. What is a minivan?

22 A. At the time Chrysler created the minivan, which  
23 was the first real minivan in automotive history, it was a  
24 vehicle that was purposefully smaller than the full-sized  
25 van at the time that Chrysler was manufacturing, and the

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1 market, there were two markets that the minivan was  
2 attempting to create, which was a small cargo van, as well  
3 as a passenger van.

4 And one of the things, if you look at history,  
5 you will find that one of the market niches that the  
6 minivan was attempting to conquer and actually did so quite  
7 successfully was the old family station wagon, which was a  
8 passenger vehicle.

9 So the minivan was designed for the purposes of  
10 both cargo and passenger car transport, passenger car style  
11 transport. In that context, it was replacing the old  
12 station wagon.

13 Q. What is a station wagon?

14 A. The old station wagon, that was a vehicle that  
15 the passenger compartment was full -- excuse me -- was  
16 enclosed by the body structure, and instead of having a  
17 trunk, the station wagon had one unit of enclosed interior  
18 volume, very similar to a van. For example, the old  
19 Galaxy 500 sedan had two enclosed interior volumes. One  
20 was the passenger compartment and the other was the trunk.

21 When the Galaxy 500 was configured as a station  
22 wagon, then the interior compartment that was the passenger  
23 compartment and the trunk became one complete enclosed  
24 volume. There was no separation between the passenger  
25 volume and the trunk volume, and that constituted the

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1 station wagon.

2 Q. Is the station wagon the same thing as a wagon?

3 A. No. In the automotive industry, the station  
4 wagon referred to an automobile, and wagon can refer to  
5 almost anything that has four wheels on it. A wagon is not  
6 necessarily, and I'm being precise, but a wagon can be  
7 something that you haul toddlers along in the streets of  
8 Manhattan.

9 Q. In the automobile world, is there something  
10 called a wagon?

11 A. There is, you know, for example, a vehicle called  
12 the Dodge Wagon, and it was a full-sized van that was used  
13 primarily for passenger transport. And we referred to it  
14 as a wagon, but it was marketing terms. I'm not familiar  
15 with the regulatory or the definitive level.

16 Q. You answered my next question.

17 That's no vehicle classification of a wagon that  
18 you are familiar with or aware of that is in the federal  
19 regulations?

20 A. There may be, because the federal regulations are  
21 so huge, but I have not had a reason to get involved with  
22 that definition.

23 Q. What is an automobile?

24 A. The term "automobile" comes from -- it has two --  
25 it is a compound word. I will discuss the mobile part

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1 first. Mobile refers to the fact that one of our ancestors  
2 referred to something called the wheel. Typically, it has  
3 360 degrees and it is round, although the original wheel  
4 may have been square. Both had 360 degrees, however.

5 Q. And the auto portion?

6 A. The auto portion, at this point, although it has  
7 changed, we can refer to a gentleman named Otto in one  
8 instance or a person named Diesel in the other who made the  
9 internal combustion engine. Mobile makes the mobility. So  
10 hence, we have the automobile.

11 Any vehicle that's automated by an engine and has  
12 wheels is an automobile.

13 Q. Is a van an automobile?

14 A. Yes.

15 Q. A truck is an automobile?

16 A. Yes.

17 Q. A wagon is an automobile?

18 A. No, not in the context of a toddler on the New  
19 York City street, but the Dodge Wagon because it has an  
20 engine and it has wheels. The mobility is automated. So  
21 it is an automobile.

22 Q. A hatchback, is that an automobile?

23 A. Yes.

24 Q. The old station wagon, is that an automobile?

25 A. Yes.

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1 Q. Is there a vehicle classification for automobile  
2 that you are familiar with in the modern parlance of what  
3 constitutes a vehicle classification?

4 A. I don't think -- well, I don't think -- they talk  
5 about automobiles in the regulations and the volumes of  
6 pages, but the classification that I'm familiar with is  
7 with passenger car, which is more narrow; in other words,  
8 passenger car is a subcategory of automobiles.

9 Q. What is a passenger car?

10 A. The passenger car is one that is specified and  
11 designed for the purposes, the primary purpose of passenger  
12 transport. Typically, they are sedans. A passenger car is  
13 typically a sedan-type vehicle.

14 Q. Did you say that there was something that you  
15 reviewed in the regulations that's a non-passenger car?

16 A. I didn't say that.

17 Q. I'm sorry then.

18 Do you agree that automobiles are vehicles that  
19 are less than 6,000 pounds?

20 A. No, because automobiles can be trucks or walk-in  
21 vans. An automobile by definition is a broad range of  
22 automotive mobility. That term is a very broad term.

23 Q. Do you agree that a passenger car is a vehicle  
24 that's less than 6,000 pounds?

25 A. Typically, yes.

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1 Q. Can an SUV, a sports utility vehicle, be  
2 considered a passenger car or automobile?

3 A. Well, that's a compound question. In other words  
4 SUVs are automobiles. The fact that they carry passengers  
5 and are primarily passenger transport oriented, people will  
6 use the term that it is a passenger car, but in terms of  
7 the government regulations, an SUV has its own category.  
8 It is a different class of automobile. Again, it is a  
9 subset of the broad mechanism that we call automobiles.

10 Q. Directing your attention to paragraph 22 in your  
11 Declaration, Exhibit 1, you say a minivan also fits these  
12 criteria. The term "minivan" is primarily a marketing  
13 term. Technologically, a minivan is not distinguishable  
14 from a van.

15 What do you mean by that statement, that  
16 technologically, a minivan is not distinguishable from a  
17 van?

18 A. At the level of motive force, meaning both  
19 vehicles have engines and both vehicles are very similar in  
20 shape and configuration. Um, both vehicles are configured  
21 to either accommodate passengers or cargo. Both vehicles  
22 use the same manufacturing techniques. For the most part,  
23 welded suspension systems, electronic control systems.

24 At the technological level, they're basically the  
25 same, and what we're dealing with here between minivan and



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1 van is scale.

2 Q. Minivans and vans offer the same chassis?

3 A. Typically, no. When you use the term "van," I  
4 could be referring to what we refer to as the B-Body within  
5 Chrysler, which was the full-sized van. Whereas the  
6 minivan was built on a chassis called the S-Body. So they  
7 can be different, but a minivan is a van, but a van is not  
8 necessarily a minivan.

9 Q. What type of chassis is the B-Body chassis?

10 A. That was unitized. The engineering or  
11 manufacturing technology that we used was unitized, which  
12 is the same as Unibody. And the minivan was also unitized  
13 and Unibody, and I use the distinction there because many  
14 folks use the term "Unibody."

15 Unibody is the result of utilizing the body and  
16 the chassis in one unit. When we say "unitized," we mean  
17 one unit. So I'm being specific.

18 Q. Was the B-Body chassis that you are referring to  
19 the chassis that's used for a truck?

20 A. No. The B-Body was a Unibody design. It did not  
21 have a separate frame.

22 Q. And the S-Body, that was a car chassis?

23 A. No. That was a Unibody as well.

24 Q. You stated before that a minivan is a van, but  
25 not all vans are minivans; is that correct?

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1           A.       Yes.  In other words, a full-sized van is a  
2   minivan, but all minivans are vans.

3           Q.       What is the source for that conclusion?

4           A.       Um, my source is logic; in other words, a minivan  
5   is a van, but a van such as the full-sized Dodge van, it is  
6   a van, but it is not a minivan.  It is a full-sized van.

7           Q.       Is there a regulatory definition that you are  
8   referring to when you reach that conclusion?

9           A.       No.

10          Q.       Going to paragraph 20 of your Declaration, there  
11   are six general characteristics.

12                    What is your basis for stating that a van has the  
13   characteristic that the body fully encloses the driver and  
14   the compartment?

15          A.       That's a matter of van design history.  Every van  
16   that I've ever had experience with or contact with, the van  
17   has one interior volume.  So the driver and the front seat  
18   passenger and the entire interior volume is singular and it  
19   is fully enclosed.

20          Q.       Are there any other kinds of vehicles that are  
21   not vans where the body fully encloses the driver and the  
22   cargo compartment?

23          A.       Yes.

24          Q.       What types of vehicles?

25          A.       Well, the SUVs typically have one interior

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1 volume; for example, there are taxis on the New York City  
2 street that utilize the Ford Escape, the SUV. So the  
3 passenger compartment and the cargo area are not separated  
4 by structure, such as the passenger car, which has  
5 passenger volume and trunk separated by structure.

6 So the answer to your question, Counselor, is  
7 that typically the SUV is another example of a vehicle that  
8 has a single enclosed interior volume, but it's not a van.

9 Q. What about a sedan? Does a sedan fully enclose  
10 the driver and cargo compartments?

11 A. No. Typically, a sedan has two fully enclosed  
12 volumes. One is the passenger volume and then a structure  
13 and then trunk; for example, the Crown Victoria has two  
14 enclosed interior volumes that are utilized for different  
15 purposes, one for passenger and one for cargo.

16 Q. What about a station wagon? Is that a vehicle  
17 that has a body that fully encloses the driver and the  
18 cargo compartment?

19 A. Yes. That's a passenger vehicle that has one  
20 interior space in it.

21 Q. What about a hatchback? Is that an example of a  
22 vehicle that has a body that fully encloses the driver and  
23 the cargo compartment?

24 A. Yes.

25 Q. Does the Ford Focus fall into this category that

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1 fully encloses the driver and the cargo compartment?

2 A. I believe it depends on which Ford Focus. There  
3 are a few Ford Focuses, and I believe there's one that  
4 separates the passenger compartment from the trunk. I'm  
5 not familiar with that vehicle. If it has one interior  
6 volume and it has the appearance of a passenger car, that  
7 might be incidental. The Ford Focus because it has one  
8 interior volume, that does not make it a van. There are a  
9 combination of things that makes it a van.

10 Q. Are you familiar with something called a Smart  
11 Car?

12 A. No.

13 Q. The Fiat?

14 A. Which one? There's a Fiat 500, and, frankly, to  
15 answer your question directly, I'm not familiar with those  
16 vehicles.

17 Q. The second characteristic, what is the basis for  
18 your statement that a van is a vehicle that has a box-like  
19 shape?

20 A. Again, that's my experience and that's the  
21 history. Vans have a boxy shape to them. This is a  
22 characteristic that's generally known, I will say.

23 Q. Is this a characteristic in any of the  
24 regulations that you have reviewed?

25 A. I believe some of the regulations refers to the

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1 shape of the vehicle, yes.

2 Q. Do all parts of the vehicle have to fit within  
3 that box as part of the box-like shape?

4 A. No. You know, in some configurations, I will  
5 refer to it as the nose of the vehicle, which is what will  
6 house the power train of the vehicle. So the box is a  
7 generality.

8 In the old verbiage of the van, for example, the  
9 original Dodge vans, the original Ford vans, some of the  
10 General Motors vans, they were a box. And there was no  
11 protrusions, and some of the minivans and the cargo vans  
12 that we now have on the market evolved from that box shape  
13 and still have, basically, a box shape.

14 So that's the basis -- in responding to your  
15 question, that's the basis of the van. The van is,  
16 basically, a box.

17 Q. Are there other types of vehicles that have  
18 box-like shapes that are not vans?

19 A. Well, again, yes, but once you get to the hood  
20 links of an SUV, it kind of walks away from the van status;  
21 in other words, the example that I just gave of the Ford  
22 Escape, the nose of the vehicle, I will call it, is much  
23 longer than the typical van.

24 So the answer to your question is that it has a  
25 box-like shape, but it's not a van and it has

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1 characteristics that distinguish it from being a van.

2 Q. What about the Mini Cooper? Does the Mini Cooper  
3 have a box-like shape?

4 A. Some might feel that it does, but a Mini Cooper  
5 is definitely not a van.

6 Q. What about the Nissan Cube? Does that have a  
7 box-like shape?

8 A. The last Cube that I saw was box-like.

9 Q. Is that a van?

10 A. Is a Cube a van? One could call it a van based  
11 upon the shape, but I would not refer to it as a van. It  
12 is not marketed as a van. I don't believe any of the  
13 materials that promote the vehicle refer to it as a van.

14 Q. What would you call it?

15 A. It's a passenger car.

16 Q. The next characteristic, sliding doors, you say  
17 that a van has a characteristic of sliding doors on a panel  
18 or panels. What is the basis for this characteristic?

19 A. What is the basis of me stating that's a  
20 characteristic?

21 Q. Yes.

22 A. Again, that's a matter of history and that's a  
23 matter of expertise and experience with van vehicles. This  
24 is an additional characteristic that contributes to the  
25 status of being a van.

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1 Q. Is that a characteristic that you have seen in  
2 any of the federal regulations pertaining to vans?

3 A. I believe so.

4 Q. Do you know which one?

5 A. No, I don't. I seem to remember some of the  
6 NHTSA regulations referring to sliding doors, and that  
7 would have been in Part 564, but I'd have to check the  
8 volumes of federal documents to answer that question.

9 Q. Was the sliding door referred to in this part of  
10 Code of Federal Regulations as a characteristic for a van?

11 A. Yes, I believe so.

12 Q. Can there be a driver door that slides on a van?

13 A. Yes. The general answer to your question is,  
14 yes, there are configurations where there's a sliding door  
15 on the front position, but in general, the front doors are  
16 hinged doors. They are swinging doors rather than sliding  
17 doors.

18 Q. So the front position, it could be either the  
19 driver's door or the front passenger door?

20 A. Yes.

21 Q. What does a door style have to do with van  
22 characteristics?

23 MR. BROWN: Objection.

24 Q. You can answer.

25 A. Again, it is a matter of history. It is a matter

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1 of my experience and expertise with vans. Typically, we  
2 add -- we do have vans that have hinged doors in the second  
3 position, but in our history and as someone representing  
4 the manufacturers, we accommodate large body sided openings  
5 on vans by use of a sliding door, because the body side of  
6 the van accommodates that particular door style.

7           The large body side of a van accommodates both  
8 swing and sliding, but because of the body side being  
9 somewhat having a large area, we can accommodate the  
10 sliding door. Vans are very good at accommodating the  
11 sliding door.

12           So that's another characteristic that contributes  
13 to the vehicle being considered a van.

14       Q.     Are there vehicles that fall under the  
15 classification of van that do not have sliding doors?

16       A.     Yes. There was, I believe, a Mazda that was  
17 making a van that had second position swing doors. I  
18 believe the original Mazda MPV did not have sliding doors,  
19 and this would have been in the late 1980s, early 1990s.

20       Q.     How about a Ford large van? Does that have  
21 sliding doors?

22       A.     Yes. You are referring to what the industry  
23 calls the E150 or the E250, and those vehicles had both.  
24 They had both sliding side doors and they had swing doors.  
25 That's a very large vehicle. So it depends on what the



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1 customer's requirements are. The sliding doors are also  
2 available on the E150 vehicle.

3 Q. When you say they had both sliding doors and  
4 swing doors, you mean at option or the vehicle itself had  
5 both types of doors on the vehicle?

6 A. No. I believe I said that it's available. So  
7 the answer to your question, the specific answer to your  
8 question is, yes, it has options. So you have the option,  
9 as I said, depending on the customer's requirements.

10 So the customer may have the need for sliding  
11 doors, such as taxi service or they may have a need for  
12 egress, ingress with hinged doors. So it depends on what  
13 the market requirements were, but both were available on  
14 the E150.

15 Q. What about any Chrysler vans? Did any of them  
16 not have sliding doors?

17 A. Not have sliding doors?

18 Q. Is there any Chrysler van, any Chrysler vehicle  
19 that you would consider to be vans that did not have  
20 sliding doors?

21 A. Not that I'm aware of.

22 Q. The next characteristic in paragraph 20 of  
23 Exhibit 1, A van refers to a vehicle where there's a rear  
24 door that can access the main compartment of the vehicle  
25 (both passenger and cargo compartments of the vehicle).

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1           What do you mean by this?

2           A.       This is referring to the singular interior  
3 volume, again. So the rear door when it opens, it exposes  
4 the passenger compartment and the cargo compartment  
5 simultaneously. Whereas in a sedan, the rear door or trunk  
6 lid when you open it, it does not expose the passenger  
7 portion of the interior volume. It only exposes the trunk  
8 volume, but in a van, it has an additional characteristic.  
9 When you open the rear door, you are exposed to that  
10 singular interior enclosed volume.

11          Q.       Are there other vehicles that you do not consider  
12 to be vans that have a rear door that can access the main  
13 compartment of the vehicle?

14          A.       Yes. SUVs.

15          Q.       Are there specific makes or models that you have  
16 in mind as an example?

17          A.       Well, the Ford Explorer is one example. You open  
18 the rear door and you are exposed to the entire rear  
19 volume, but it's not a van.

20          Q.       Are there any automobiles that have a rear door  
21 that can access the main compartment of the vehicle?

22          A.       Some. The examples that we discussed earlier;  
23 for example, a hatchback can do that.

24          Q.       Or a station wagon?

25          A.       Or a station wagon.

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1 Q. The next characteristic, this characteristic of  
2 the rear door that can access the main compartment of a  
3 vehicle, is that set forth in any regulatory definition  
4 that you are aware of?

5 A. I believe it is.

6 Q. Do you know where?

7 A. No. I would have to go over the documentation  
8 again, but I do recall running into the fact that access to  
9 the rear cargo door exposes the singular interior volume.

10 Q. The next characteristic in paragraph 20 says that  
11 a van, it is a vehicle with an integral structure or has an  
12 integral structure, meaning that the vehicle is built with  
13 a Unibody as opposed to a separate chassis and frame.

14 What do you mean by that?

15 A. There's only one exception to that that I'm aware  
16 of, and the exception that I'm discussing is in the  
17 mainstream, and there may be others, but the majority, the  
18 only exception to Characteristic Number Five is the E150  
19 that we discussed earlier. Everything else uses unitized  
20 construction and it creates a Unibody.

21 Q. My question is, what did you mean that a vehicle  
22 has to have an integral structure as opposed to a separate  
23 chassis and frame?

24 A. I'm sorry for that, Counselor. What I'm  
25 referring to there is another character that seems to

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1 contribute to the vehicle being classified as a van. These  
2 days, the construction methodology is unitized and that  
3 methodology creates a Unibody. There's no separate frame  
4 and body. Vans these days typically, as is with the NV200,  
5 they are Unibody.

6 Q. Does this mean that the vehicle is simply one  
7 piece?

8 A. Well, the unitized construction methodology --  
9 the quick answer to your question is yes, but, in other  
10 words, when we unitize, we are using frame members attached  
11 to the body directly, and so in the process of constructing  
12 the vehicle, we no longer need a separate frame. That's  
13 why we call it Unibody, meaning one. So the frame members  
14 and the structural members that support the suspension and  
15 the body simultaneously are unitized to the body structure.  
16 So it is one unit.

17 Q. Did you reference a term earlier called Unit Body  
18 Construction?

19 A. No. I said, "Unitized."

20 Q. Have you ever heard of the term "Unit Body  
21 Construction"?

22 A. I may have. I don't use that term, at least I  
23 hope I don't use that term.

24 Q. Is a Unibody construction a characteristic in  
25 paragraph 20 of Exhibit 1, is that different than a

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1 body-on-frame construction?

2 A. Yes.

3 Q. How so?

4 A. Again, the body-on-frame means that the chassis  
5 is separate from the body. There are two distinctly  
6 constructed units. So when you construct a Unibody, it is  
7 all welded together, and you cannot separate the body from  
8 the chassis because they're all welded together. You have  
9 to cut them apart. Whereas the separate chassis -- excuse  
10 me, Counselor. It should say separate body and frame or  
11 separate frame and body. I apologize for that typo.

12 Q. How should that read?

13 A. It should say separate body and frame or separate  
14 frame and body; in other words, the chassis and frame is  
15 the same item. We are talking about a body.

16 So to clarify and help with the fixing of this  
17 typo, the Ford Crown Victoria, the body, you can actually  
18 unbolt the body from the frame/chassis and you can lift the  
19 body off of the frame. You can't do that with the NV200.  
20 The NV200 is welded to its frame because it is unitized.

21 Q. The NV200 Cargo or the NV200 Taxi?

22 A. Both.

23 Q. So you are saying that the word "separate,"  
24 rather than on a separate frame and chassis, chassis does  
25 not belong in that sentence?

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1           A.       It is a typo. We need to have -- the distinction  
2       that we're making in Number Five is that vans are unitized  
3       and have a chassis and a body welded together. Whereas the  
4       distinction that we're making is that the body and the  
5       frame are two separate and attached units. They are bolted  
6       together, typically.

7           Q.       Mr. Sheridan, did you draft this Declaration?

8           A.       The original Declaration was done by the  
9       plaintiffs and I participated in an iterative and  
10       evolutionary process. It was collaborative.

11          Q.       When you say "by the plaintiffs," you mean for  
12       the plaintiffs?

13          A.       Yes.

14          Q.       When you say the original that was drafted by --

15                   MR. BROWN: I will object to that. I think  
16       discussions as to drafts are off limits with  
17       regards to expert testimony. He said that he  
18       worked with counsel and that's all I will let him  
19       say about it.

20                   MS. GOLDBERG-CAHN: Fair enough. I'm  
21       finding out if there's another original as  
22       opposed to a draft.

23                   MR. BROWN: I will object to that. You can  
24       ask him if there's another Declaration that he  
25       has prepared, but this is his Declaration and

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1 discussions of drafts, I believe, are off limits  
2 under the rules.

3 MS. GOLDBERG-CAHN: Fair enough.

4 Q. Is there another Declaration that was drafted for  
5 this case?

6 A. Not by me.

7 Q. As pertaining to you.

8 A. No.

9 Q. Can you provide some examples of vehicles that  
10 are body-on-frame construction?

11 A. Yes. The E150 that we discussed earlier.

12 Q. That's the full one?

13 A. Yes. And the Ford Crown Victoria.

14 Q. What about a Chevrolet Express? Is that a  
15 body-on-frame construction?

16 A. I think it is.

17 Q. What about the GMC Savana? Is that a  
18 body-on-frame construction?

19 A. I don't know. The Savana, I believe that one is  
20 as well. Those are old designs. They're fairly old  
21 designs in terms of construction methodology.

22 Q. What about the Dodge Mercedes Sprinter or at one  
23 point it was the Chrysler Sprinter? Are you familiar with  
24 the Dodge Mercedes Sprinter?

25 A. I have ridden in the vehicle, but I have not

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1 inspected the vehicle, and they're used at the airports  
2 frequently. I believe that it is a separate body-on-frame,  
3 but I don't know that. I would have to inspect that.

4 Q. Would you consider the Dodge Mercedes Sprinter to  
5 be a van?

6 A. It is a full-sized van, yes.

7 Q. Moving forward to the next characteristic in  
8 paragraph 20 that a van has a front body section of the  
9 vehicle (the hood is short), what is the basis for that  
10 statement?

11 A. That, again, is part of history and expertise.  
12 This is an additional characteristic that's indicating to  
13 the observer that the vehicle in question is probably a  
14 van. And in the case of say the NV200 versus the Ford  
15 Explorer SUV, the NV200 has a very short hood compared to  
16 the Ford Explorer SUV and it has a very short hood let's  
17 say to the Crown Victoria.

18 So the characteristic of having a very short hood  
19 is part of the evolution that I stated earlier that we  
20 start with the box and we still have the box, but the nose  
21 has gotten a little bit longer, but not very long. So the  
22 hood is still very short.

23 Q. Is there a particular measurement that you refer  
24 to as the hood being short?

25 A. Usually, thirty inches or less from the base of



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1 the windshield to the hood panel end. The NV200 is  
2 twenty-nine-plus inches. Whereas my Crown Victoria, which  
3 I own and I drive a Crown Victoria, the hood goes on  
4 forever and it is four feet.

5 Q. That thirty-inch measurement, does that come from  
6 any federal regulation or statute that you have reviewed?

7 A. Not the thirty inches per se, but the relative  
8 term "short" is utilized in some of the federal documents.

9 Q. How do you get the measurement for what  
10 constitutes the hood, from what part of the vehicle to what  
11 part of the vehicle?

12 A. Typically, the leading edge, which is usually the  
13 lower edge of the windshield. We would sometimes refer to  
14 it as the base of the windshield, and because of the  
15 complex shape of windshields, we, generally, make the  
16 measurement from the vehicle's center line.

17 So you go from the base of the windshield at the  
18 vehicle's center line to the front edge of the hood  
19 (indicating). And there are two measurements that you  
20 make.

21 You make the actual linear measurement that I  
22 will refer to it as the hypotenuse of the triangle versus  
23 the vertical, because hoods can typically be inclined. So  
24 there's the horizontal measurement that you would get in  
25 plane view and then there's the hypotenuse or the actual

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1 length of the hood that I will call it, which would be the  
2 side view.

3 To the best of my recollection, the NV200 was  
4 29.3 inches in the side view, meaning the hypotenuse. So  
5 the hood is kind of short.

6 Q. What about the other view that you were referring  
7 to?

8 A. That would be from a person named Pythagoras, and  
9 don't ask me to spell it. In plane view, it is less.

10 Q. Less than the vertical view or the hypotenuse?

11 A. Than the side view, because you are looking at  
12 the side of the vehicle.

13 Q. You start your measurement at the base of the  
14 windshield and you go to what part of the vehicle exactly?

15 A. The very end of the sheet metal.

16 Q. Does that include the bumper?

17 A. No.

18 Q. Does that include any grille?

19 A. No.

20 Q. What is your basis for excluding the bumper from  
21 the measurement?

22 A. The hood itself defines the measurement in which  
23 we are housing the power train, and because we have the  
24 power train stuffed into a box, we typically don't need to  
25 extend it very long. And the automation, which I will

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1 refer to as the grille, has different criteria than what is  
2 used to make it a van, and the bumper has completely  
3 different criteria. It could be very extended because some  
4 manufacturers want to employ a five-mile-per-hour  
5 protection system. So some of the bumpers are extended.

6 So the criteria that we use for the hood must be  
7 on very narrow terms. Otherwise, we end up with everyone  
8 talking about different dimensionalities. The end of the  
9 windshield to the edge of the sheet metal is what we refer  
10 to as the shortness or length of the hood.

11 Q. When you said the end of it, where are you  
12 getting that from?

13 A. Well, that's from my experience in the industry  
14 and my work in the industry. It is generally known that it  
15 is a term that's defined in terms of the Body Builder's  
16 Guide, in terms of vehicle designs, in terms of competitive  
17 discussions.

18 When manufacturers compare their vehicle to other  
19 vehicles, they use the same criteria to make their  
20 measurements and do their comparisons.

21 Q. And this is what one considers to be the front  
22 body section?

23 A. No. I'm just referring to the hood.

24 Q. Is that in any federal regulatory definition that  
25 you have seen?

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1           A.       As I testified to earlier, I do recall somewhere  
2           in the volumes of information that I reviewed the relative  
3           shortness of the hood is contained.  There's no definitive  
4           measurement, but there's a relative statement about hood  
5           length.

6           Q.       What is the basis for your statement that the  
7           NV200 protrudes 29.3 inches or something that you said into  
8           the head of the leading edge of the windshield?

9           A.       That was either a measurement that I saw in the  
10          Body Builder's Guide or the Nissan website.  I distinctly  
11          remember that measurement.

12          Q.       I direct your attention to paragraph 59 of your  
13          Declaration of Exhibit 1.  You talk about the foremost body  
14          section of the NV200 protrudes only 29.3 inches ahead of  
15          the leading edge of the windshield, and it cites the Body  
16          Builder's Guide, page 56.

17                    I assume this is the Cargo Body Builder's Guide?

18          A.       Yes.

19          Q.       Can you look at Defendants' Exhibit 5, which is  
20          the NV200 2013 Compact Cargo Body Builder's Guide, page 56?  
21          Can you point to me where it is?

22          A.       That's another typo, Counselor.  It is actually  
23          page 57.  Let me temper that a little bit.

24                    You know, sometimes the Body Builder's Guide  
25          pages change numbers and we may have had another one that

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1 was on page 56. If we look at page 57 of what has been  
2 marked as Defendants' Exhibit 5, Dimension B refers to the  
3 29.3 inches on page 57.

4 Q. How would you describe where the line Dimension B  
5 goes from, in your own words?

6 A. In this particular case, going from right to  
7 left. Going from right to left (indicating). On this  
8 page, you start at this vertical line and moving left,  
9 meaning forward in the vehicle, and you will note that it  
10 ends at the leading edge of the hood.

11 Q. So the right line, that is what you would  
12 consider to be the leading edge of the windshield?

13 A. Yes. Typically, the windshield goes underneath  
14 this section. It is not shown in this diagram, but the  
15 windshield is actually mounted down here at the center line  
16 (indicating). It is at the center line of the vehicle.

17 Q. And the left line of Measurement B, that refers  
18 to what?

19 A. The foremost edge of the hood sheet metal.

20 Q. In the diagram that you are seeing on page 57 of  
21 the Cargo Body Builder's Guide, are there other parts of  
22 the vehicle that go further left than where the left line  
23 of Dimension B goes?

24 A. Yes.

25 Q. What are those?

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1           A.       Well, as we mentioned earlier, one would be the  
2 grille. In this particular instance, they're depicting the  
3 bumper fascia, f-a-s-c-i-a, and the bumper structure is  
4 underneath the fascia.

5                    So in this instance, it might be signal lamps  
6 that would be enclosed in the fascia, but these are things  
7 that are not considered to be the hood.

8           Q.       And fog lamps, signal lamps, is that lighting?

9           A.       Yes.

10          Q.       Did you look at the NV200 Taxi Body Builder's  
11 Guide to see if the same measurement is contained in there?

12          A.       I don't think that I did. That's only because I  
13 just got it yesterday.

14          Q.       The NV200 Taxi Body Builder's Guide marked as  
15 Defendants' Exhibit 6, if you have a moment to look through  
16 there, is there anything in there that makes you think that  
17 measurement is in Exhibit 6?

18          A.       I'm perusing the document, Counselor, and I have  
19 not found an equivalent type of data set that specifies the  
20 hood length the way that it is set forth in the cargo  
21 version of the Body Builder's Guide. And this, again, may  
22 be part of the evolution of this document where it  
23 continues to add information as time goes on, because the  
24 Body Builder's Guide someplace down the line, they would  
25 want to ensure that that information is consistent with the

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1 first one.

2 So that's part of the reason that these documents  
3 become larger than their initial publication.

4 Q. Is it true that the NV200 Compact Cargo is a 2013  
5 publication and whereas Exhibit 6, the NV200 Taxi  
6 publication, is for 2014?

7 A. Yes.

8 Q. I want to direct your attention to Exhibit 5, the  
9 Compact Cargo Body Builder's Guide, page 69. There's a  
10 diagram, Measurement C.

11 Can you describe in your own words what  
12 Measurement C refers to?

13 A. C is what we call the front overhang. It is the  
14 dimensions from the front wheel center line to the very  
15 front edge of all body components. In this case, it goes  
16 from the front wheel center line to the very front edge of  
17 the fascia.

18 Q. What is the measurement that you saw for  
19 Measurement C in inches?

20 A. 38.1 inches.

21 Q. And the front overhang measurement, is it your  
22 understanding that the front overhang measurement is  
23 different than the front body section?

24 A. Yes.

25 Q. Going back to page 69, given that the vehicle,

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1 the furthest-most measurement, the overhang measurement  
2 extends 31.8 inches, does this still make the vehicle boxy?

3 A. Yes. It is still boxy. The front overhang is a  
4 dimension that all vehicles have, and it does not  
5 necessarily relate to shape, because a completely boxed  
6 vehicle would still have a front overhang dimension. Ford  
7 Crown Victorias have an overhang. Chevrolet Express  
8 vehicles have an overhang. That's a common dimension.

9 Q. Didn't you reference earlier something about the  
10 measurement extending beyond thirty inches?

11 A. Strictly for the hood length itself.

12 Q. But up to the front overhang, it goes beyond  
13 thirty inches; is that correct?

14 A. The hood measurement is contained within and is  
15 subservant to the 38.1 inches, yes.

16 Q. Can vehicles that are not vans have short hoods?

17 A. They can. A vehicle can have a short hood, yes.

18 Q. Can you think of any vehicles that are vans that  
19 have short hoods?

20 A. I'm thinking of the Cube. The Cube has a very  
21 short hood. That's the one that comes to mind. If you  
22 want me to think some more about it, I can think some more  
23 about it.

24 Q. What about the Mini Cooper? Does that have a  
25 short hood, but it's not a van?



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1           A.       I need to look at the measurements on the Mini  
2 Cooper. I believe it has a short hood, but it is  
3 definitely not a van and it does not have a sliding door.  
4 It is the accumulation of characteristics.

5           Q.       Are there any vehicles that you would classify as  
6 a van that have long hoods?

7           A.       Can I hear that again?

8           Q.       Are there vehicles that you would classify as a  
9 van that have long hoods?

10          A.       I'm not aware of any.

11          Q.       What about the Ford van that you were talking  
12 about earlier?

13          A.       The E150?

14          Q.       Yes.

15          A.       It's a short hood. When you look at it, yes. It  
16 is, basically, a box and the hood is short. I don't know  
17 the exact dimensions, because, again, with respect to  
18 scale, the E150 is a full-sized van.

19                   MS. GOLDBERG-CAHN: Can we have this  
20 document marked?

21                   (Whereupon, the aforementioned document was  
22 marked as Defendants' Exhibit 7 for  
23 identification as of this date by the Reporter.)

24          Q.       I direct you to Defendants' Exhibit 7 (handing).  
25 Have you had a chance to look at it?

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1 A. Not yet, but I'm familiar with this vehicle.

2 Q. What type of vehicle is this?

3 A. This is an E vehicle.

4 Q. Is this a different vehicle or the same as the  
5 Ford E-Body that you were talking about?

6 A. I was referring to the E150 and the E250. And  
7 the designation, the numerical designation refers to the  
8 vehicle's ability to carry increased loads. So a 250 is a  
9 heavier duty vehicle and carries more load. The 150 is the  
10 base version of the E series for a van. It is a full-sized  
11 van.

12 Q. So this is a vehicle that you would consider to  
13 be a van?

14 A. Correct.

15 Q. Does this have a long hood?

16 A. No. It is a short hood and it is a box shape.  
17 This vehicle comes with both sliding doors and hinged doors  
18 at the side. It has one interior volume. When you open  
19 the rear doors, it opens to one enclosed interior volume.  
20 This vehicle has all of the characteristics of a van, and  
21 in the relative sense, it has a short hood.

22 Q. You would say that this hood is not longer than  
23 thirty inches?

24 A. I don't know that. I would have to check that.

25 Q. Just looking quickly at paragraph 21 of your

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1 Declaration, you refer to van characteristics that are  
2 sometimes cited. I'm trying to understand the basis for  
3 your statement that certain characteristics can sometimes  
4 be cited as opposed to paragraph 20, which are cited.

5 A. Again, in the process of accumulating visual data  
6 and vehicle characteristics, these add to the assessment  
7 that a vehicle is a van.

8 So, for example, sedans don't typically have  
9 folding or removable seats, but many vans do. The 8,500  
10 gross vehicle weight, that can contribute to the fact that  
11 it is a van as opposed to a full-sized truck. And the last  
12 consideration, Number Nine, that it can participate in  
13 markets that require the vehicle to carry people and/or  
14 cargo or just cargo, um, it means that the vehicle is  
15 accumulating the characteristics that make this assessment  
16 to be a van.

17 Q. Let's take them one at a time.

18 What is the basis or source for the  
19 characteristic that it has foldable or removable seats?

20 A. That's from my experience in the industry. When  
21 we conceive a van, we typically at the base level in its  
22 original design stages, we make considerations, design  
23 considerations for folding or removable seats in the  
24 vehicle.

25 Q. Do cargo vans have foldable or removable seats?

## SHERIDAN

1 A. Yes.

2 Q. Do you know whether the NV200 Taxi has folding or  
3 removable seats?

4 A. I haven't had a chance to inspect the vehicle,  
5 but I do not know for sure one way or another. I would  
6 like to inspect the vehicle.

7 Q. Is there anything in the NV200 Taxi Body  
8 Builder's Guide that would point you to whether or not the  
9 vehicle has folding or removable seats?

10 A. Without a more detailed time to review this  
11 document, I can't answer this question.

12 Q. Have you heard or read anything to indicate  
13 whether or not the NV200 has folding or removable seats?

14 A. I believe it does, but I have not inspected the  
15 vehicle.

16 Q. So what about the Dodge Mercedes Sprinter, the  
17 vehicle that we talked about earlier? Does that have  
18 folding or removable seats?

19 A. I believe it does. It depends on what  
20 configuration is shipped by Daimler. That's what we called  
21 a walk-in van because it is so tall. You can walk into the  
22 van in the front position.

23 Q. I want to clarify something.

24 When you talk about foldable or removable seats,  
25 are you talking about passenger seats or any seats?

## SHERIDAN

1           A.       No.  Primarily, passenger seats.  As a matter of  
2 fact, with the NV200, I believe the front passenger's seat  
3 is removable so that you can put in long cargo.  It is  
4 foldable for that same purpose.

5           Q.       Are there any rear passenger seats in the NV200  
6 Cargo vehicle?

7           A.       No.

8           Q.       So there are none?

9           A.       None that I'm aware of, I should say.

10          Q.       Do hatchbacks have folding or removable rear  
11 passenger seats?

12          A.       The rear seat is foldable in the hatchback, and  
13 that's for purposes of extending cargo carrying capability.

14          Q.       Are you aware of any sedans that have folding or  
15 removable passenger seats?

16          A.       I'm not aware of any that are removable, but some  
17 have seats that would fold down to extend the rear trunk  
18 area, but it encloses the passenger volume, but there are  
19 some sedans where you can fold that rear seat and insert  
20 your skis, for example.

21          Q.       You don't know, as you sit here today, whether or  
22 not the NV200 Taxi has rear foldable or removable seats?

23          A.       I don't know for certain that they do, but I'm  
24 confident if we had to remove them, we could.  Is that a  
25 design feature in the NV200?  I don't know that.  When I

## SHERIDAN

1 say "NV200," I meant the taxi.

2 Q. What do you mean by that, if you had to remove  
3 them or fold them, then they could?

4 A. I was just being precise. In other words, the  
5 seats can be removed mechanically.

6 Q. Could the seats be removed mechanically in any  
7 vehicle that has a permanent seat structure?

8 A. Yes, but the specificity of my answer means the  
9 convenient, removable of the seat is convenient in a taxi,  
10 and I don't know that without inspecting it.

11 Q. Are you referring to whether the user can remove  
12 or fold the seat when you are citing this as a  
13 characteristic that it is sometimes cited in vans?

14 A. Yes. What we refer to with the ease that a seat  
15 can be folded or removable, it is user-friendly and no  
16 tools are needed.

17 Until I inspect the NV200 Taxi, I don't know the  
18 status of that particular item.

19 Q. Would it change your analysis if we told you that  
20 the rear seats of the NV200 Taxi could not be folded or  
21 removed by the user?

22 A. No. The taxi is still a van.

23 Q. But would it change your opinion that it does not  
24 meet this characteristic?

25 MR. BROWN: Objection.

## SHERIDAN

1 Q. You can answer.

2 A. It does not change my analysis. It would be one  
3 of the characteristics that did not accumulate, but it does  
4 not obviate the fact that the taxi is still a van.

5 Q. The next characteristic sometimes cited in  
6 paragraph 21 marked as Exhibit 1 is that the vehicle has a  
7 gross vehicle rating of less than 8,500, gross vehicle  
8 weight rating, GVWR.

9 What do you mean by that?

10 A. The gross vehicle weight rating, that's the  
11 maximum that the manufacturer advises in a load condition.  
12 It is what we call a curb weight and the payload. So vans  
13 of this ilk and this size typically do not go above 8,500  
14 combined, between curb weight and the payload. The payload  
15 means both passenger and cargo.

16 Q. What about the one in Defendants' Exhibit 7?  
17 Does that exceed 8,500?

18 A. Yes. The full-sized vans typically do. The  
19 context of this Declaration has to do with what we call  
20 compact vans and minivans. So there are large versions of  
21 vans that will exceed the 8,500 GVWR, such as the E150.

22 Q. What do you mean when you say that the context of  
23 this Declaration is referring to compact vans or minivans?

24 A. Well, the litigation involves the NV200, which is  
25 a compact and/or minivan.

## SHERIDAN

1 Q. Are you saying that the characteristics that you  
2 cite in paragraphs 20 and 21 that do or sometimes pertain  
3 to vans are only for compact vans or minivans?

4 A. No. We're trying to be narrow with respect to  
5 focusing on what constitutes the assessment of the NV200.  
6 So in our assessment, these criteria apply, and the  
7 assessment is that it is a van.

8 Q. Isn't it true that most automobiles have a gross  
9 vehicle rating of less than 8,500 pounds?

10 A. Yes.

11 Q. What about SUVs?

12 A. Some do and some do not. There are some large  
13 SUVs like the General Motors Suburban. They have very,  
14 very large GVWRS.

15 Q. What about pick-up trucks? Do those have a gross  
16 vehicle weight rating of less than 8,500 pounds?

17 A. Some do.

18 Q. And some don't?

19 A. And some don't.

20 Q. In paragraph 21, sometimes characteristics of a  
21 van, the last one that you say, The van may be designed to  
22 carry people or cargo, but is survived from a vehicle  
23 primarily designed to carry cargo, what is the basis of  
24 this statement?

25 A. In my experience, for example, on the Chrysler



## SHERIDAN

1 minivan, as well as on the Chrysler full-sized van, which  
2 was the B-Body and the former is referred to as the S-Body,  
3 the original concept and I will concentrate on the minivan  
4 for a moment, the original concept was a cargo van and we  
5 later added seats to it, but in the iteration of adding  
6 seats and carpeting and what I will refer to as creature  
7 comforts, we never changed the status of the minivan. It  
8 was always a minivan.

9 Q. Are there any regulations that you read that  
10 provide the source for this criteria about the vehicle  
11 being designed to carry people or cargo, but are primarily  
12 designed to carry cargo?

13 A. The short answer is yes, but I don't remember  
14 them using this very specific wording, but, in general,  
15 this type of discussion is made by regulatory bodies about  
16 vans.

17 Q. You cannot point me to any specific ones?

18 A. I could, but it would take some time.

19 Q. So you mentioned one example. I think it was the  
20 Chrysler minivan that was derived from a vehicle primarily  
21 designed to carry cargo. Are there others that meet this  
22 characteristic?

23 MR. BROWN: Other than the NV200 that we are  
24 talking about?

25 MS. GOLDBERG-CAHN: Well, in his sometimes

## SHERIDAN

1           cited characteristics prior to looking at the  
2           NV200.

3           A.       Correct me if I'm wrong, Counselor, I think your  
4           question was, were there any others other than the S-Body,  
5           because that was the context of my statement and you are  
6           asking if there are any others like the S-Body that began  
7           life as a cargo van at its concept level and then carrying  
8           people and carrying cargo, yes, the B-Body is an example.

9                    The B-Body, which is the full-sized Ram van that  
10           was conceived, it was a cargo van and then we added seats  
11           and rugs and, as I said, creature comforts, but it was  
12           always a van, regardless of some of the additional  
13           components that we added.

14          Q.       Aren't pick-up trucks designed primarily to carry  
15           cargo?

16          A.       Yes.

17          Q.       Are they vans?

18          A.       No.

19          Q.       What about SUVs? Are they primarily designed to  
20           carry cargo?

21          A.       In my experience, no. The SUV when it is  
22           conceived, and I am using a very specific term in the  
23           industry, we conceive products. At the conception level,  
24           the SUV is designed primarily for the carrying of people,  
25           but it can also accommodate cargo. At the concept level,

## SHERIDAN

1 it is designed for people.

2 Q. Are there any vehicles that you would classify as  
3 automobiles that are considered as vehicles primarily  
4 designed to carry cargo?

5 A. In the automobile category, that word is very  
6 broad.

7 Q. Passenger car automobiles?

8 A. Can I have the question again, Counselor?

9 Q. Are there any vehicles that you would classify as  
10 passenger car automobiles that are considered as vehicles  
11 primarily designed to carry cargo?

12 A. You said passenger car automobiles?

13 Q. Or automobiles. You used the words  
14 interchangeably.

15 MR. BROWN: Objection.

16 Q. Are there any vehicles that you would classify as  
17 passenger vehicles that are primarily designed to carry  
18 cargo?

19 A. No. Passenger cars are primarily designed to  
20 carry people.

21 Q. Are there any vehicles that you would classify as  
22 passenger automobiles that are primarily designed to carry  
23 cargo?

24 MR. BROWN: Objection.

25 A. I don't know what you mean by "passenger

## SHERIDAN

1 automobiles." There's passenger car, and in the broad  
2 category of automobiles that covers everything, so a  
3 passenger car is a subset of the automobile broad set.

4 Q. Are there any vehicles that you would classify as  
5 a sedan that are considered vehicles primarily designed to  
6 carry cargo?

7 A. No. Sedans are designed to carry passengers.

8 Q. We are talking about the Town & Country platform.  
9 Was it based upon a car platform?

10 A. You said I discussed the Town & Country? I have  
11 not mentioned the Town & Country.

12 Q. The S platform?

13 A. Yes, but I didn't say Town & Country. I might  
14 have said the Chrysler minivan.

15 Q. I'm sorry for that.

16 Was the Chrysler minivan based upon a car  
17 platform?

18 A. Well, to the extent that Chrysler had vehicles  
19 that were Unibody, some could allege that they were  
20 similar, but the S-Body had its own platform that we were  
21 designing for the minivan product. So the specific answer  
22 is no. It had its own design. It had its own Unibody  
23 design.

24 Q. What type of, and forgive me for my lack of  
25 technical knowledge, drive, all wheel drive, front wheel

## SHERIDAN

1 drive, rear wheel drive does a similar large van have, in  
2 your experience?

3 A. Well, I will use the term "full-size," full-sized  
4 vans like the E-Body are rear wheel drive.

5 Q. What about minivans like the Chrysler?

6 A. Minivans are front wheel drive.

7 Q. Would you consider whether a vehicle is front  
8 wheel, rear wheel or four wheel drive to be something that  
9 makes it part of the technology of the vehicle?

10 A. The drive configuration is a technological  
11 consideration of any vehicle, yes.

12 Q. I want to direct your attention to paragraph 39  
13 of your Declaration of Exhibit 1, where you talk about  
14 Vehicle Identification Numbers, or VIN numbers.

15 What is the basis for your statement that the  
16 seventh character in the VIN denotes body type?

17 A. Um, this was specific to the NV200, and that  
18 information was gleaned from the compact cargo version of  
19 the Body Builder's Guide.

20 Q. So it is true that the characters of a VIN could  
21 differ based upon the specific vehicle or manufacturer?

22 A. Yes.

23 Q. So the seventh character of a VIN does not  
24 necessarily denote body type in all vehicles; is that  
25 correct?

## SHERIDAN

1           A.       I believe that's correct.  There are different  
2       submissions to the government in terms of the VIN.  There  
3       are some broad categories that the VIN must comply with,  
4       and those are specified by NHTSA.  Again, this particular  
5       paragraph was specific to the NV200 Compact Cargo Van Body  
6       Builder's Guide information.

7           Q.       Let's read that paragraph.

8                   In compliance with NHTSA regulations, every motor  
9       vehicle in America carries a metal plate with a Vehicle  
10      Identification Number, VIN.  A VIN is a seventeen-character  
11      sequence, of which the first eleven characters designates  
12      specific characteristics of the vehicle, such as  
13      manufacturer, engine type and body type, and the final six  
14      digits are the individual vehicle's serial number.  The  
15      seventh character in the VIN denotes body type.  Often this  
16      metal plate is located near the driver's side door.

17                   Isn't it true that this paragraph is referring to  
18      the general characteristics of VIN?

19           A.       Well, many VINs share this characteristic, but  
20      the paragraph is below Item Number Two, which discusses the  
21      NV200, so the context is the NV200.  Again, I gleaned this  
22      from the Body Builder's Guide for the compact cargo van.

23           Q.       But the paragraph, the first sentence reads,  
24      Every motor vehicle in America carries a metal plate with a  
25      VIN; is that correct?

## SHERIDAN

1 A. To the best of my knowledge, that is true.

2 Q. Another --

3 MR. BROWN: Objection.

4 Q. So just to clarify, it is your testimony that the  
5 meaning and sequence of the characters in a VIN can vary by  
6 manufacturer?

7 A. They can. There are some minor differences  
8 between them. For example, I don't know for sure that the  
9 seventh character in a Chrysler minivan is a body type. It  
10 probably is, but I have read in my many years of experience  
11 with the automobile industry that they do change the VIN.

12 As a matter of fact, the NV200 has two different  
13 VIN sequences. So even within Nissan, there can be  
14 variations in this character sequence in its definition.

15 Q. Looking at paragraph 40, you reference that the  
16 seventh character of the VIN in the NV200 is a K. What is  
17 your understanding of a K?

18 A. It comes from the Body Builder's Guide, and it  
19 specifies when Nissan places a K there, they are indicating  
20 to the government and to the general public that it is in  
21 the category of cargo van.

22 Q. This is specific to the NV200 Compact Cargo Body  
23 Builder's Guide; is that correct?

24 A. Yes.

25 Q. Have you seen, have you reviewed what the seventh

## SHERIDAN

1 character in the VIN for the Body Builder's Guide for the  
2 NV200 Taxi is?

3 A. I did last night. I need to look at it again,  
4 but the quick answer to your question is, yes, I did look  
5 at those pages. I mentioned it earlier in the testimony  
6 that I looked at those pages.

7 MR. BROWN: I want to note for the record,  
8 since you are not showing him the documents and,  
9 obviously, there was a typo previously, if you  
10 are showing him a document cited that you have  
11 given to him, I will ask him to look at the  
12 documents so it does not appear that you are  
13 tricking him.

14 MS. GOLDBERG-CAHN: That was my next  
15 question.

16 Q. Would you look at the Taxi Body Builder's Guide,  
17 which is marked as Exhibit 6?

18 MR. BROWN: That's not what I'm talking  
19 about.

20 Q. Page 39. Can you tell me what it says for the  
21 seventh character position on the NV200 Taxi?

22 A. Again, as I just testified, even within a  
23 manufacturer, the seventeen-character sequence can be  
24 different. In this particular instance, it is a J. It  
25 says, Definition, taxi.



## SHERIDAN

1 Q. What does it say under qualifier for the seventh  
2 character?

3 A. I'm sorry; Counselor, I missed that. Oh,  
4 qualifier. In the broad category above, body type.

5 Q. Does this change your conclusion that based upon  
6 the VIN that the NV200 Taxi is a cargo van?

7 A. Is a cargo van?

8 Q. Does this change your conclusion that based upon  
9 the VIN, the NV200 Taxi is a van?

10 MR. BROWN: Objection. He stated his  
11 position.

12 A. No.

13 Q. The seventh character in the VIN leads to the  
14 conclusion that the NV200 Taxi is a van, and I'm asking if  
15 now --

16 MR. BROWN: Nowhere in the basis of the  
17 opinion does he say that -- I agree it is in the  
18 Declaration and you can ask him about it -- his  
19 opinion because the seventh letter was a K,  
20 that's a basis of his opinion.

21 Q. Looking at your Declaration, paragraph 43, these  
22 classifications appears to be referring to the seventh  
23 character of the VIN, meaning that at the product design  
24 stage, Nissan classified the NV200 as a van; is that  
25 correct?

## SHERIDAN

1           A.       I'm sorry; Counselor, you interjected in that  
2       question the seventh character, but by paragraph 43, we had  
3       already discussed the first character in the eighteen-digit  
4       sequence. So there are two separate levels. That's what  
5       I'm trying to address.

6           Q.       Let's go to the subheading, the vehicle  
7       identification plate affixed to the vehicle characterizes  
8       the NV200 as a van; is that correct?

9           A.       Yes.

10          Q.       So isn't it true that the seventh character of  
11       the VIN denotes that the vehicle is characterized as a  
12       taxi?

13                   MR. BROWN: Objection.

14          Q.       You can answer.

15          A.       The context of this statement is the NV200, not  
16       the NV200 Taxi.

17          Q.       I direct your attention to paragraph 51 of the  
18       Declaration. The first line says that the NV200 Taxi to be  
19       used as a Taxi of Tomorrow is not structurally  
20       distinguishable from these award winning vans globally. I  
21       believe vans globally, it references the NV200 Cargo  
22       vehicle.

23                   What is the basis for this statement?

24          A.       My review of the website, review of interviews on  
25       You Tube with Nissan officials, whatever materials I could

## SHERIDAN

1 glean regarding the Taxi of Tomorrow versus the NV200 Cargo  
2 Van.

3 Structurally, they're all the same. They're both  
4 Unibody. They both have characteristics that accumulate,  
5 per paragraphs 20 and 21 of the Declaration. They are both  
6 constructed the same way. I suspect, and I do not know for  
7 sure, they both were assembled in the same structural  
8 plants, either in Turkey or Mexico. So structurally,  
9 they're not distinguishable. They're the same. They're  
10 all vans.

11 Q. Footnote One, the NV200 Taxi, the body is  
12 7.9 inches larger than the models sold in global markets.  
13 So my expert opinion based on my extensive knowledge of  
14 automotive construction is that a 7.9-inch body extension  
15 of this manner is not a significant structural change of  
16 this vehicle.

17 Can you explain the basis for your conclusion  
18 that a 7.9-inch length difference is not a structural  
19 change?

20 A. Well, I said significant structural change.

21 Q. So is it your testimony that it is a structural  
22 change?

23 A. Well, the structure is lengthened. So at least  
24 at that level, there's a change in the structure, but 7.9  
25 inches is less than what we increased the Chrysler minivan.

## SHERIDAN

1 We had a short wheelbase version and then we had a long  
2 wheelbase version.

3 As a matter of fact, we increased the body length  
4 by fifteen inches, and even then, it was still a van.

5 That structural change in the minivan by fifteen  
6 inches did not change its status from being a van, and  
7 changing from a cargo van increasing by 7.9 is the same  
8 basic situation. It does not change the taxi from being a  
9 van.

10 Q. Where did you get this measurement of the NV200  
11 Taxi body being 7.9 inches longer than the model sold  
12 overseas?

13 A. I don't remember, as I sit here today.

14 Q. Is a fifteen-inch length difference a significant  
15 structural change?

16 A. It wasn't in terms of the classification of the  
17 vehicle. It was just we were accommodating additional  
18 seats in the rear. So it wasn't significant for us because  
19 we could still manage it within the same assembly plant.  
20 These two vehicles, whether it is the base vehicle or the  
21 increased length vehicle, can still be built in the same  
22 assembly plant with the same techniques and the same  
23 wheelbase.

24 Q. Would an increase in the height of the vehicle be  
25 a significant structural change?

## SHERIDAN

1 A. It could be.

2 Q. Depending on what?

3 A. Well, I don't know how high you are changing it.  
4 If you make it three feet or one foot, a minor change in a  
5 roof panel as a result of changing all of the body size to  
6 get the roof higher could be significant. That's different  
7 than lengthening the vehicle. Lengthening the vehicle is  
8 not as difficult as raising the roof, and I mean that  
9 literally.

10 Q. Would a 7.9 increase in the height of the vehicle  
11 be a significant structural change?

12 A. In my opinion, yes.

13 Q. Just going back for a second, how many passenger  
14 rows are typically in a minivan?

15 A. In our vehicle, it was two rows. It was a front  
16 row and a second row, and then in the extended minivan,  
17 which we call the long wheelbase minivan, it was three  
18 rows.

19 Q. Are you referring to the Chrysler?

20 A. Yes.

21 Q. What about in other minivans?

22 A. The same configurations. There was a short  
23 wheelbase Ford Aerostar and a long wheelbase Ford Aerostar  
24 and they had similar rows.

25 Q. Does the number of rows as passenger seating

## SHERIDAN

1 constitute a characteristic that you think that should be  
2 looked at in deciding whether to classify it as a van?

3 MR. BROWN: Objection.

4 A. No.

5 Q. Do you agree that the NV200 Taxi does not have a  
6 third row?

7 A. To the best of my knowledge, it does not have a  
8 third row. The rear-most compartment is for cargo.

9 Q. Looking at paragraph 56 of your Declaration, is  
10 it your conclusion that the NV200 Taxi is a light-duty  
11 truck?

12 A. Well, the NV200 Cargo Van has been submitted to  
13 the government as a truck. It is light duty. When I say  
14 "truck," I'm referring to the NHTSA classifications that  
15 are available for submission by a manufacturer.

16 Q. Do you know if the NHTSA classification is for  
17 the NV200 Taxi?

18 A. The NHTSA doesn't make the classification. The  
19 manufacturer does.

20 Q. Do you know what the manufacturer submission of  
21 the classification to NHTSA is for the NV200 Taxi?

22 A. I have discussed this with NHTSA personnel, and  
23 they tell me that it is to be classified as a multipurpose  
24 passenger vehicle.

25 Q. Is it your conclusion that the NV200 Taxi is a

## SHERIDAN

1 light-duty vehicle?

2 A. No. It is being submitted as an MPV. Although  
3 it has the characteristics of a light-duty truck, Nissan is  
4 submitting the taxi version only as an MPV.

5 Q. Which characteristics of a light-duty truck do  
6 you think that the NV200 Taxi has?

7 A. Well, it is not heavy duty. It is light. It has  
8 similar characteristics to the truck, but because of the  
9 addition of seats and other things, as well as increased  
10 safety compliance, Nissan is able or is attempting to  
11 classify the taxi version only as an MPV, but the base  
12 configuration and the base structure is the same as the  
13 NV200 Cargo Van, so that's the basis of the statement.

14 MS. GOLDBERG-CAHN: Give us two minutes to  
15 confer.

16 (Whereupon, a short recess was taken for  
17 five minutes.)

18 BY MS. GOLDBERG-CAHN:

19 MS. GOLDBERG-CAHN: Back on the record.

20 Q. Just looking at your Declaration, paragraph 76,  
21 you refer to the American National Standard Institute, or  
22 ANSI, regulation. I guess I'm trying to understand what  
23 you mean by ANSI standards are incorporated by reference  
24 into the federal motor vehicle standards.

25 What do you mean by that?

## SHERIDAN

1           A.       The ANSI existed before the Safety Act did and  
2 before many governmental regulatory bodies existed. In  
3 history, the existing nomenclature and verbiage, I should  
4 say, were adopted because there's no need to reinvent the  
5 wheel, so to speak. So some of these classifications will  
6 make its way into earlier versions of regulatory verbiage.

7           Q.       But is the ANSI a governmental agency?

8           A.       No, I don't believe so. I believe it is an  
9 independent institute.

10          Q.       So are you trying to say that the federal  
11 regulations are referencing ANSI regs and standards?

12                   MR. BROWN: Objection. Asked and answered.

13          A.       In some cases, they do.

14          Q.       Are the federal regulations adopting the  
15 conclusions in the ANSI standards?

16                   MR. BROWN: Objection.

17          A.       Without looking at the voluminous details that  
18 are implied by the question, I can't answer the question,  
19 Counselor.

20          Q.       Are you able to tell me the differences between  
21 the NV200 Cargo and the NV200 Taxi?

22          A.       I can explain some of them. I can't explain all  
23 of them without doing an inspection of the proposed NV200  
24 Taxi. I know some of the interior components that make it  
25 a taxi, you know, the paint scheme, some of the



## SHERIDAN

1 requirements for being a livery vehicle in the City of New  
2 York. I did review, for example, the video that discusses  
3 the accessed version, the mobility access version of the  
4 taxi. I am not prepared and at this moment, I can't give  
5 you detailed side-by-side dimensional comparisons, but if I  
6 did, it would not change my conclusion that the taxi is  
7 still an aggregate a van.

8 Q. Are you able to give examples of some other  
9 differences between the two vehicles?

10 A. Well, the gross differences being, for example,  
11 the addition of the second row seating position. That is a  
12 change, but it is completely consistent with what we went  
13 through in the Chrysler minivan. We had a cargo minivan  
14 which had a front driver's seat and a front passenger's  
15 seat and we had a second row and we added a third row.

16 That makes sense when the market is transporting  
17 people in a taxi context. Without doing a Taxi of Tomorrow  
18 inspection, the detailed changes, differences, I can't  
19 state, but I strongly believe that none of those details  
20 will change the assessment that the taxi is a van.

21 MS. GOLDBERG-CAHN: Mark this as Exhibit 8.

22 (Whereupon, the aforementioned document was  
23 marked as Defendants' Exhibit 8 for  
24 identification as of this date by the Reporter.)

25 Q. I will show you what has been marked as

## SHERIDAN

1 Defendants' Exhibit 8. Do you recognize this document  
2 (handing)?

3 A. It is the, I will use the term, the parent  
4 directory of PVSHERIDAN.com. This is an accumulated bunch  
5 of documents that came from other people, myself. It all  
6 got transferred into the server that addresses PVSHERIDAN.

7 Q. Who manages PVSHERIDAN.com?

8 A. These days, I do, but I don't do a very good job  
9 of it. I upload documents from time to time and other  
10 people have access to it and they upload documents and they  
11 have other documents.

12 Q. Who are the other folks?

13 A. Veronica Chapman and a few others. I have to  
14 find out who has my password. This is for primarily  
15 uploading legal documents and legal discussions that are  
16 public.

17 Q. Is Ms. Chapman an employee of yours?

18 A. No. She's just a friend.

19 Q. What does PV Sheridan stand for?

20 A. Paul Victor Sheridan.

21 Q. And that's you?

22 A. Yes. That's me.

23 Q. This is a directory from your website?

24 A. Yes. If you see it, most are PDFs, and the  
25 reason that I got this, you can't e-mail stuff. So you

## SHERIDAN

1 upload. Servers on the Internet, they are much faster than  
2 e-mail servers. So if I need to transfer a fairly large  
3 document, I will upload it here because it is faster and I  
4 will give the people the links to download it.

5 MS. GOLDBERG-CAHN: I think that's it.

6 Thank you.

7 MR. BROWN: I have a couple of questions.

8 EXAMINATION BY

9 MR. BROWN:

10 Q. Mr. Sheridan, you reviewed, I think you used the  
11 term, "voluminous documents" in terms of this case; is that  
12 true?

13 A. Yes.

14 Q. I think you also testified that some information  
15 was conveyed to you by counsel; is that correct?

16 MS. GOLDBERG-CAHN: Objection.

17 A. Yes.

18 Q. Did you have any reason to doubt any of the  
19 information that was conveyed to you by counsel?

20 A. There may have been a time where we had a  
21 discussion about the information, but the general answer to  
22 your question is no.

23 Q. Did you have any questions about any facts that  
24 were being conveyed to you?

25 A. No. Legal facts or detailed facts, no.

## SHERIDAN

1 Q. Directing your attention to Exhibit 3, now, I  
2 know you said that you did not recognize that. I believe  
3 you said that you did not recognize that front page.

4 Have you had a chance to look through that  
5 document?

6 MS. GOLDBERG-CAHN: Objection.

7 A. During the break, I did look through it, yes.

8 Q. Is it possible that that's a document that you  
9 reviewed?

10 A. In looking at it more closely, I believe I have  
11 seen some of the pages, but I don't remember seeing this  
12 cover, but in all of the pages and all of the documents  
13 that I looked at, some of these look familiar to me, but I  
14 don't remember seeing this cover.

15 Q. And Exhibit H to your Declaration, which lists  
16 documents that you reviewed in preparation for the Expert  
17 Declaration, do you see that?

18 A. Yes.

19 Q. Do you have any reason to believe that you did  
20 not review the documents that are listed in Exhibit H?

21 A. Well, again, review includes direct review, so  
22 the answer to your question is no.

23 Q. You have no reason to believe that you did not  
24 review or receive the information listed in Exhibit H? Is  
25 that what you are saying?

## SHERIDAN

1 A. Correct.

2 MS. GOLDBERG-CAHN: Objection.

3 Q. Counselor showed you a letter that you wrote to  
4 Mr. Liu. Do you remember that letter?

5 A. Yes.

6 Q. And would it be a fair generalization to say  
7 that --

8 MS. GOLDBERG-CAHN: We are referring to  
9 Exhibit 2.

10 Q. Would it be a fair generalization to say that you  
11 were writing that letter because you wanted to get the  
12 Mayor or Mr. Liu, as you say in the letter, to do the right  
13 thing?

14 MS. GOLDBERG-CAHN: Objection.

15 A. That's my primary purpose, yes.

16 Q. Now, this letter has nothing to do -- strike  
17 that.

18 Does this letter have anything to do with the  
19 issue whether the Taxi of Tomorrow is a van?

20 MS. GOLDBERG-CAHN: Objection.

21 A. None whatsoever.

22 Q. Your assignment in this case, if you could just  
23 read from paragraph 17 of your Declaration, was to assess  
24 whether or not the Nissan NV200 qualified as a van; is that  
25 correct?

## SHERIDAN

1 A. Yes.

2 Q. So putting aside whatever your views were about  
3 doing the right thing might be, did this letter, or  
4 Exhibit 2 have any bearing on your opinion in this case?

5 MS. GOLDBERG-CAHN: Objection.

6 A. There's no connection whatsoever.

7 Q. I know you were also shown Exhibit 4 and you said  
8 that, I believe, you did not recognize that document; is  
9 that accurate?

10 A. Yes.

11 Q. But did you also testify that you recall  
12 receiving some of the information that's contained in that  
13 document?

14 MS. GOLDBERG-CAHN: Objection.

15 A. Yes.

16 Q. Counselor asked you a couple of questions with  
17 respect to the nine characteristics that you cite in  
18 paragraphs 20 and 21.

19 Do you recall, generally, those questions?

20 MS. GOLDBERG-CAHN: Objection.

21 Q. I just want to make it clear, it is your  
22 testimony that if a vehicle has one of these  
23 characteristics that it would, therefore, be a van, isn't  
24 that true?

25 A. In singular, that is true.

## SHERIDAN

1 Q. Also, it is not your testimony that if a vehicle  
2 lacked one of these items, then it could never be a van,  
3 isn't that correct?

4 A. Correct.

5 Q. You have had a chance since writing your  
6 Declaration to review the NV200 Body Builder's Guide for  
7 the taxi; is that correct?

8 A. Very recently, yes.

9 Q. Does anything that you have seen in that report  
10 change your opinion as to whether the NV200, whether the  
11 cargo van or taxi, is a van?

12 MS. GOLDBERG-CAHN: Objection.

13 A. No.

14 Q. And if I could just direct your attention to  
15 paragraph 40 of your Declaration.

16 You conceded at this deposition that there are a  
17 couple of typos in your Declaration; is that correct?

18 A. Yes.

19 Q. You did not intentionally misrepresent anything  
20 in your Declaration, did you?

21 A. No.

22 Q. For example, do you see that there's a cite in  
23 paragraph 40, the VIN number on page 33 of the Cargo Body  
24 Builder's Guide?

25 A. Yes.

## SHERIDAN

1 Q. Now, that does not appear on page 33?

2 A. No.

3 Q. Does it appear on page 34?

4 A. Yes.

5 Q. And similarly in paragraph 42, you refer to  
6 page 34 with respect to a Y character. Does that appear on  
7 page 34?

8 A. No.

9 Q. Do you see where that appears?

10 A. It appears on the subsequent page, page 35.

11 Q. It appears it was a typo, as you said?

12 A. A typo or a change in page numbering, because  
13 they come in as PDFs. It is a minor typo.

14 Q. You said that you saw a video of the NV200?

15 A. Yes.

16 Q. Do you know who made that video that you saw?

17 A. If I recall correctly, I've seen two that discuss  
18 the accessible NV200 Taxi. One was done by a New York area  
19 news station and one was done by Nissan, if I can recall  
20 correctly.

21 Q. Very earlier today, we talked that you had been  
22 qualified as a general automotive safety expert on a number  
23 of occasions; is that correct?

24 A. Yes.

25 Q. In order to be a general automotive safety



## SHERIDAN

1 management expert, do you also require expertise in  
2 classification of vehicles?

3 MS. GOLDBERG-CAHN: Objection.

4 A. Yes.

5 Q. You said that in the Mohr case, one of the  
6 related issues was the classification of vehicles, isn't  
7 that right?

8 A. Yes.

9 Q. Do you recall a discussion -- withdrawn.  
10 Just going back to what I was asking earlier,  
11 your testimony is that you list nine characteristics, but a  
12 van does not necessarily need to have all of those  
13 characteristics in order to be classified as a van, isn't  
14 that true?

15 MS. GOLDBERG-CAHN: Objection.

16 A. To be assessed as a van, that's correct.

17 Q. So, for example, a van in a certain circumstance  
18 could have hinged doors as opposed to sliding doors; is  
19 that correct?

20 A. Yes.

21 Q. But the Van Nissan NV200 and the NV200 Taxi that  
22 you have seen included in a video and recently in the Body  
23 Builder's Guide, based upon your expertise, is that a van?

24 MS. GOLDBERG-CAHN: Objection.

25 A. Yes.

## SHERIDAN

1 Q. If you could turn to paragraph 51 of your  
2 Declaration. Do you see that there's a citation to the  
3 Vehicle Supply Agreement? That's referring to  
4 paragraph 51.

5 A. Yes.

6 Q. Above that citation, it refers to modifications  
7 to the NV200 Taxi; is that correct?

8 A. Yes.

9 Q. And that information was relayed to you?

10 MS. GOLDBERG-CAHN: Objection.

11 A. Yes.

12 Q. That's why you included it in the Declaration?

13 A. Yes.

14 Q. You understand that information is contained in  
15 the supply agreement; is that correct?

16 A. Yes.

17 Q. Counselor asked you a lot of questions about your  
18 review of Exhibit 5. Do you recall that?

19 A. Yes.

20 Q. Exhibit 5 being the NV200 Compact Cargo Body  
21 Builder's Guide?

22 A. Yes.

23 Q. Can I direct your attention to paragraph 29 of  
24 your Declaration?

25 A. Yes.

## SHERIDAN

1 Q. In 29 of your Declaration, you say because the  
2 NV200 is the base vehicle for the NV200 Taxi, the Body  
3 Builder's Guide for the NV200 is a reliable and informative  
4 source of information about what the basic characteristics  
5 of the NV200 are. Do you see that?

6 A. Yes.

7 Q. That's your opinion?

8 A. Yes, it is.

9 Q. Having seen what has been marked as Exhibit 6, is  
10 it still your opinion that the NV200 is the base vehicle  
11 for the NV200 Taxi?

12 A. Yes.

13 Q. In fact, is there any question in your mind that  
14 the NV200, based upon your experience, the NV200 Compact  
15 Cargo is the base vehicle for the NV200 Taxi?

16 MS. GOLDBERG-CAHN: Objection.

17 A. There's no doubt in my mind that it is.

18 MR. BROWN: Nothing further.

19 MS. GOLDBERG-CAHN: One follow-up question.

20 FURTHER EXAMINATION BY

21 MS. GOLDBERG-CAHN:

22 Q. Why did you leave employment with Chrysler?

23 A. I was dismissed from Chrysler.

24 Q. Why were you dismissed?

25 A. During the end of 1994, the Federal Government

## SHERIDAN

1 was conducting a defect investigation on Chrysler minivans  
2 and I had announced to my superior, Mr. Dennis Malecki,  
3 M-a-l-e-c-k-i, about my intention to report my knowledge of  
4 safety defects on the minivan to the government.

5 Subsequently, the legal staff decided that I needed to be  
6 dismissed. My office was raided. I -- I was fired without  
7 notice. I was sued without notice. So those were the  
8 reasons for my dismissal.

9 Q. You were sued by Chrysler?

10 A. Yes. They initiated a lawsuit.

11 Q. A lawsuit regarding what?

12 A. They made the claim that my dismissal was based  
13 upon the leaking of confidential safety information.

14 Q. They sued you for allegedly leaking safety  
15 information?

16 A. Yes.

17 Q. What was the outcome of that litigation, if any?

18 A. Eventually, they defined their basis for firing  
19 me as my knowledge or my participation in a 20/20 program,  
20 which I had not given yet when they fired me. And with  
21 that type of confusion in their litigation against me, the  
22 Judge dismissed both cases, my counterclaim and the  
23 Chrysler case. And so the matter was resolved by both  
24 lawsuits being thrown out.

25 MS. GOLDBERG-CAHN: Thank you. Nothing

## SHERIDAN

1 further.

2 FURTHER EXAMINATION BY

3 MR. BROWN:

4 MR. BROWN: One follow-up question.

5 Q. The circumstances that you are talking about was  
6 that you were attempting to report something because you  
7 thought that it was the right thing to do?

8 A. That's exactly what I was doing.

9 MR. BROWN: Thank you.

10 MS. GOLDBERG-CAHN: Thank you.

11 (Whereupon, at 2:15 p.m., the examination of  
12 this witness was concluded.)

13

14

15

\_\_\_\_\_  
PAUL V. SHERIDAN

16

17 Subscribed and sworn to before me

18 this \_\_\_\_ day of \_\_\_\_\_ 20\_\_.

19

20

\_\_\_\_\_  
NOTARY PUBLIC

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## SHERIDAN

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11	EXHIBIT	EXHIBIT	
12	NUMBER	DESCRIPTION	PAGE
13	1	Declaration	6
14	2	Letter to John Liu	26
15	3	Vehicle Supply Agreement	34
16	4	Nissan NV200 Taxi Specifications	38
17	5	2013 Nissan Guide	52
18	6	2014 Nissan Guide	55
19	7	Picture of vehicle	89
20	8	PVSHERIDAN directory	113

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25

## SHERIDAN

## C E R T I F I C A T E

1  
2 STATE OF NEW YORK )  
3 : SS.:  
4 COUNTY OF NEW YORK )

5 I, DAVID SHELDON, a Notary Public for and  
6 within the State of New York, do hereby certify:

7 That the witness whose examination is  
8 hereinbefore set forth was duly sworn and that such  
9 examination is a true record of the testimony given by that  
10 witness.

11 I further certify that I am not related to any  
12 of the parties to this action by blood or by marriage and  
13 that I am in no way interested in the outcome of this  
14 matter.

15 IN WITNESS WHEREOF, I have hereunto set my hand  
16 this 19th day of September 2013.

17  
18 

19 \_\_\_\_\_  
20 DAVID SHELDON

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