

Robert J. Alumbaugh
CLERK OF STATE COURT

IN THE STATE COURT OF GWINNETT COUNTY
STATE OF GEORGIA

JOSHUA KYLE HILL,	*	
	*	
Plaintiff,	*	
	*	Civil Action File
v.	*	
	*	No. 17-C-07188-1
INDIANA MILLS & MANUFACTURING	*	
INC,	*	
COMMERCIAL VEHICLE GROUP, INC,	*	
CVG NATIONAL SEATING COMPANY,	*	
LLC (f/k/a National Seating Company).	*	
	*	
Defendants.	*	

CONSOLIDATED PRE-TRIAL ORDER

The following constitutes the Consolidated Pre-Trial Order entered in the above-styled case after conference with counsel for the parties:

1.

The names and addresses of the attorneys who will conduct the trial are as follows:

Attorneys for Plaintiff Joshua Kyle Hill:

Cale Conley (lead counsel)
Davis Popper
Scott Farrow
CONLEY GRIGGS PARTIN LLP
4200 Northside Parkway, N.W.
Building One, Suite 300
Atlanta, Georgia 30327

Noah B. Abrams (admitted *pro hac vice*)
ABRAMS & ABRAMS, P.A.
1526 Glenwood Avenue
Raleigh, North Carolina 27608

Attorneys for Defendant Indiana Mills & Manufacturing Inc.

Terry O. Brantley
Alicia A. Timm
SWIFT, CURRIE, MCGHEE & HIERS, LLP
The Peachtree, Suite 300
1355 Peachtree Street, N.E.
Atlanta, Georgia 30309

Kevin C. Schiferl (admitted *pro hac vice*)
Blake N. Shelby (admitted *pro hac vice*)
FROST BROWN TODD, LLC
201 North Illinois Street
Suite 1900
Indianapolis, Indiana 46244

Attorneys for Defendant Commercial Vehicle Group, Inc. and CVG National Seating Co., LLC

Frederick N. Sager, Jr.
Christopher T. Byrd
Benjamin P. Ralston
WEINBERG WHEELER HUDGINS GUNN & DIAL, LLC
3344 Peachtree Road, N.E.
Suite 2400
Atlanta, Georgia 30326

2.

The estimated time required for trial is: 10 days

3.

The following motions or other matters pending for consideration by the Court.

By Plaintiff Joshua Kyle Hill: Plaintiff has the following motions pending before this Court:

- Plaintiff's Omnibus Motions *in Limine*

Additionally, Plaintiff is currently scheduled to take videotaped depositions for preservation of evidence for use at trial of Defendants Commercial Vehicle Group, Inc. and/or CVG National Seating Company, LLC's (collectively referred to herein as the "CVG Defendants") 30(b)(6) corporate representative(s) as well as of Dr. John Lin, and the parties may take other evidentiary depositions for preservation of evidence for use at trial (if necessary). Accordingly, Plaintiff reserves the right to file any motions and/or

deposition designations that may stem from such deposition(s) prior to trial and in a way so as to not in any way delay trial.

By Defendant Indiana Mills & Manufacturing, Inc.: Defendant Indiana Mills & Manufacturing, Inc. (“IMMI”) has the following motions pending before this Court:

- Defendant IMMI’s Motion *in Limine* and Incorporated Brief Regarding Seatbelt-Mounted Pretensioners
- Defendant IMMI and the CVG Defendants’ Motion *in Limine* and Incorporated Brief Regarding Documents from Unrelated Lawsuit
- Defendant IMMI and the CVG Defendants’ Motion *in Limine* and Incorporated Brief Regarding Load Shift Arguments
- Defendant IMMI and the CVG Defendants’ Omnibus Motions *in Limine*

Further, IMMI understands that the Court intends to hear arguments regarding whether Defendants would be entitled to a set-off any potential award in favor of Plaintiff from settlement amounts paid to Plaintiff by former-Defendants PACCAR, Inc. and Kenworth Trucking Company.

By the CVG Defendants: The CVG Defendants have the following motions pending before this Court:

- Defendant IMMI and the CVG Defendants’ Motion *in Limine* and Incorporated Brief Regarding Documents from Unrelated Lawsuit
- Defendant IMMI and the CVG Defendants’ Motion *in Limine* and Incorporated Brief Regarding Load Shift Arguments
- Defendant IMMI and the CVG Defendants’ Omnibus Motions *in Limine*
- The CVG Defendants’ Omnibus Motion *in Limine* Regarding the Feasibility of Implementing RollTek onto CVG National Seating Company’s Seat in the Subject Tractor

Further, CVG Defendants understand that the Court intends to hear arguments regarding whether Defendants would be entitled to a set-off any potential award in favor of Plaintiff from settlement amounts paid to Plaintiff by former-Defendants PACCAR, Inc. and Kenworth Trucking Company.

4.

The jury will be qualified as to relationship with the following:

By the Plaintiffs:

- Cale Conley
- Richard Griggs
- Ranse Partin
- Davis Popper
- Scott Farrow

- Conley Griggs Partin LLP
- Noah B. Abrams
- Abrams & Abrams, P.A.
- Heidi G. Chapman
- Heidi G. Chapman, PLLC
- Joshua Kyle Hill
- Indiana Mills & Manufacturing, Inc., and its owners, directors, shareholders and employees
- Commercial Vehicle Group, Inc., and its owners, directors, shareholders and employees
- CVG National Seating Company, LLC (f/k/a National Seating Company), and its owners, directors, shareholders and employees

By Defendant IMMI:

- Lexington Insurance Company
- RSUI Group, Inc.
- Allied World Assurance Company (U.S.) Inc.
- Axis Capital Insurance

By the CVG Defendants:

- Commercial Vehicle Group, Inc., and its owners, directors, shareholders and employees
- CVG National Seating Company, LLC (f/k/a National Seating Company), and its owners, directors, shareholders and employees
- Out of an abundance of caution, CVG Defendants are identifying its insurers in the event the Court deems it appropriate to qualify the jurors as to the identities of their insurers: Starr Indemnity & Liability Company; Axis Surplus Insurance Company; Endurance American Insurance Company; Twin City Fire Insurance Company; Sentry Insurance A Mutual Company; Sentry Casualty Company.

5.

(a) All discovery has been completed, and the Court will not consider any additional, further motions to compel discovery except for good cause shown. The parties, however, shall be permitted to take depositions of any person(s) for the preservation of evidence for use at trial, including the depositions of the CVG Defendants' 30(b)(6) corporate representative(s) and Dr. John Lin- as detailed in Paragraph 3 above.

(b) Unless otherwise noted, the names of the parties as shown in the caption to this order are correct and complete and there is no question by any party as to misjoinder or nonjoinder of any parties.

The following is the Plaintiff's brief and succinct outline of the case and contentions:

On December 28, 2015, Plaintiff Josh Hill was the sole occupant of a 2014 Kenworth T660 tractor-trailer (the "subject tractor-trailer"), was properly belted, and was driving with reasonable care when the subject tractor-trailer lost directional control and tipped over onto its driver's side before sliding to rest. During the foreseeable forces of the driver's side quarter roll incident, Mr. Hill's head made injurious contact with structures inside the cab, resulting in cervical spine trauma and permanent quadriplegia. The cause of Mr. Hill's spine injury and permanent quadriplegia was the subject tractor-trailer's defectively and/or negligently designed seat, seatbelt and occupant protection system, which as designed did not provide adequate protection to occupants and lacked economically feasible and technologically available safety features. The subject tractor-trailer's "occupant protection system" is comprised of a CVG air-ride suspension seat that moves vertically some six inches towards the roof of the cab during a quarter rollover event and an IMMI three-point lap and shoulder belt that is connected to the air-ride seat via the lap portion of the belt, and which did not incorporate a pretensioner to reduce slack in the belt in a quarter rollover event. The seat did not contain any type of inflatable side airbag to cushion a driver-occupant's head and/or neck during a rollover event, and neither the seat nor the seatbelt contained any type of pretensioning device to pull the seat down to the cab floor (and away from the cab's roof structures) or to couple the driver-occupant's upper torso to the seat (and away from the cab's interior structures), though such features were known and had been feasible for a number of years before the sale of the subject tractor-trailer to Mr. Hill's employer for use on the highways.

This is a "crashworthiness" case and involves the question of whether the seat and seat belt should have provided adequate protection in the crash that happened. Plaintiff contends that this crash was and should have been survivable with no debilitating or paralyzing injuries to Mr. Hill, but it was instead a paralyzing and life-altering event because the occupant protection system and its component products – CVG's air-ride suspension seat and IMMI's three-point seatbelt – failed to protect Mr. Hill's head from violently striking the roof above his window during the foreseeable driver's side quarter roll at reasonable speeds.

Plaintiff contends that that the risks of CVG's air-ride suspension seat as designed and sold are grave, and that those risks of danger could have been eliminated without impairing the utility of the product by incorporating reasonable and feasible alternative designs, and as such the seat is dangerous and defective under Georgia law. Specifically, as designed by CVG, the seat acts like a "spring" and by design allows up to six inches of vertical movement during a driver's side quarter roll event like the one that resulted in Plaintiff's paralyzing injuries. This vertical movement decreases the survivable space for a driver occupant inside the cab and thereby dramatically increases the severe risk of the occupant injuriously contacting the roof and/or roof rail with his head or upper torso, which can result in death or paralyzing spinal cord injuries, as occurred here. The subject seat is further defective because CVG knew as early as 2009 that the seat (as designed) could result in the very scenario just described; yet, CVG took no steps to re-design the seat to prevent this vertical movement or to design any type of mechanism that would instead pull the seat to its lowest position during a rollover. Similarly, Plaintiff contends that the risks of IMMI's three-point lap and shoulder belt as designed are

grave, and that those risks of danger could have been eliminated without impairing the utility of the product by incorporation reasonable and feasible alternative designs, and as such the seat belt is dangerous and defective under Georgia law. The IMMI seatbelt, which lacks a pretensioner to pull it tight in a quarter roll event, allows too much vertical and lateral movement during a driver's side quarter roll event like the one that resulted in Plaintiff's paralyzing injuries. Specifically, the geometry and anchorage point locations for the shoulder portion of the belt, by design, do nothing to prevent lateral movement at ground impact during a driver's side quarter roll event as occurred here. Further, because the lap portion of the belt is connected to the air-ride seat (i.e., the "spring"), which allows up to six inches of vertical movement, the lap belt travels up with the seat during a rollover and does nothing to restrain the occupant until the seat reaches its highest possible position, at which point the occupant's survivable space is dramatically decreased and his/her head and upper torso are exposed to the severe risk of injuriously contacting interior cab structures (and there is no pretensioner to reduce the slack allowing such movement). Finally, the seatbelt is defective because IMMI recognized the dangers posed by the seatbelt as designed and when integrated into a cab with an air-ride seat (just like the CVG seat in this case) in the early 1990's when it started developing the RollTek system; yet, IMMI continued selling the seatbelt in its standard three-point configuration for use in systems that it recognized as unreasonably dangerous and would cause "a violent impact to the head and upper torso" through contact with the cab structure, including the roof rail as occurred here. Plaintiff contends that each of the individual components (the CVG seat and the IMMI seat belt) are defective and were negligently designed and that each defendant is responsible for the respective defects in the components they manufactured, and further that the two components working as a supposed occupant restraint system were also defective in combination and failed to protect Josh Hill, causing him permanent, lifelong limitations, pain and economic damages.

7.

The following is Defendant IMMI's brief and succinct outline of the case and contentions:

Plaintiff Josh Hill is at fault for this single-vehicle rollover accident because Hill failed to maintain control of his vehicle.

IMMI is a component supplier to a sophisticated customer that manufactures trucks, PACCAR. PACCAR had studied heavy truck crashworthiness for decades before manufacturing the subject Kenworth T660 semi-truck and understood the occupant kinematics in heavy truck rollovers long before it manufactured the subject Kenworth T660 semi-truck.

PACCAR, a sophisticated trucking manufacturer, requested and specified a three-point restraint ("seatbelt") from IMMI. IMMI manufactured the seatbelt per PACCAR's specifications and did not have the ability to change or alter the seatbelt's specifications. PACCAR used the seatbelt to create the occupant protection system within the subject Kenworth T660 cab. The seatbelt that IMMI manufactured performed per its design during the subject accident and was not defective or unreasonably dangerous.. The occupant protection system created by PACCAR using the seatbelt was not defective or unreasonably dangerous, based on evidence of its efficacy, including but not limited to, the reduction of serious injuries or deaths involving persons that utilized the same or similarly configured occupant protection systems.

IMMI did not have any control or involvement in the selection and/or integration of the components that comprised the Kenworth T660's occupant protection system. IMMI acted with reasonable care at all times including, but not limited to, with respect to the design, manufacture, and sale of the seatbelt, and was not negligent in any way. IMMI was not required to test the occupant protection system in the Kenworth T660 manufactured by PACCAR or otherwise warn PACCAR with respect to the operation of the Kenworth T660's occupant protection system.

Plaintiff's cervical spine injury that caused his quadriplegia was caused by a right-sided head strike that was unrelated to the operation of the subject Kenworth T660's occupant protection system and would not have been prevented by any of Plaintiff's proposed alternative occupant protection systems. Plaintiff has expressed a desire to seek gainful employment and likely could obtain employment despite his injuries.

IMMI does not have a physical presence in Georgia and does not conduct business in Georgia. Specific to this lawsuit, no substantial part of the business was transacted in Gwinnett County, the tortious act, omission or injury did not occur in Gwinnett County, and there is no real property at issue in Gwinnett County. O.C.G.A. §§ 9-10-91, 9-10-93.

8.

The following is the CVG Defendants' brief and succinct outline of the case and contentions:

This is a single-vehicle "crashworthiness" case relating to the performance of a 2014 Kenworth T660 tractor-trailer ("subject tractor-trailer") that was designed and manufactured by former-Defendants PACCAR, Inc. and Kenworth Trucking Company (collectively, "PACCAR"). Plaintiff Joshua Hill, a professional truck driver, was injured in the single-vehicle accident on December 28, 2015 when he drove his fully loaded tractor-trailer off a rural Virginia road, rolled it onto its side and slid it into a copse of trees, heavy brush and wooden fence posts. Plaintiff alleges design defect claims against CVG – not blaming it for causing the accident, but alleging that the subject tractor-trailer should have protected him from injury during the accident. CVG supplied the seat which the truck's manufacturer, PACCAR, specified, ordered and installed into the subject tractor-trailer. The subject tractor-trailer was purchased by Plaintiff's employer, Millis Transfer, Inc. Plaintiff admits that the seat did not fail or malfunction in any way.

The following claims remain pending for trial: (1) strict liability for defective design of the seat and/or the occupant restraint system ("ORS"); (2) strict liability for failure to warn the manufacturer of the subject tractor-trailer, PACCAR; (3) negligent design of the seat and/or the ORS; (4) failure to warn the manufacturer of the subject tractor-trailer, PACCAR.

Defective Design

CVG Defendants did not manufacture the final product at-issue and, therefore, cannot be found liable for defective design of the subject tractor-trailer or its ORS. Plaintiff has admitted that the component part supplied by CVG (*i.e.* the seat) was done pursuant to PACCAR

specifications and did not fail or malfunction. CVG did not assemble other components into a part which it sold as a single product under its own name. CVG sold nothing to Plaintiff or his employer (who actually purchased the truck), and the seat was labeled by PACCAR as a Kenworth seat, emblazoned with a Kenworth logo, and integrated into PACCAR's Kenworth truck.

Further, CVG was not involved in the design of the ORS. There is no evidence that CVG ever performed any testing on the ORS. CVG at no time inspected the T660 cab in general or the ORS in particular. CVG did not, and could not, supervise PACCAR's design or production efforts or suggest alternative designs. As PACCAR's representative stated, PACCAR validates the seat design and, thereafter, it expects nothing from CVG other than fulfillment of its order in accordance with PACCAR's specifications. There is no evidence that CVG (1) was asked by PACCAR to opine (and then actually did opine) as to whether the seat was suitable for the subject vehicle, (2) gathered information regarding the vehicle's systems that would have necessarily interacted with the subject seat and the various load parameters of the truck, (3) conducted any sort of "reviews" of the seat within the truck, to determine the seat's functionality/reliability in light of PACCAR's installation of the seat, or (4) required PACCAR to change the traditional location of the seat (or anything else) within the truck's cab. CVG played no role in the selection of component parts for the subject tractor-trailer or the ORS other than fulfilling an order for the seat at-issue.

Despite the above, Plaintiff contends that the ORS as a whole was defective. However, Plaintiff's expert, Steven Meyer, testified that he would not change the CVG air-ride seat, which he recognized as an important component of PACCAR's ORS design. Rather, he would simply install additional safety devices, such as an airbag or the RollTek system. However, PACCAR has admitted that it alone chooses the component parts and safety devices which make up the ORS, that it was well aware of all the alternate designs offered by Plaintiff's expert, and that none of those designs would have or even could have been accepted into the truck at issue.

Failure to Warn

As noted above, CVG Defendants did not design or manufacture the subject tractor-trailer or the ORS such that they had a duty to warn PACCAR of any of its alleged dangers. CVG made the seat, per PACCAR's specifications, and it sold that seat to PACCAR. PACCAR then incorporated that seat into the ORS in its truck.

Further, PACCAR was well aware of the alleged dangers and of all of the alternative designs for the ORS offered by Plaintiff's expert, Mr. Meyer. PACCAR, via its engineer Larry Bean, served on the Society of Automotive Engineer's ("SAE") heavy truck crashworthiness task force from 1989 through its disbandment in 1998. The SAE task force was charged with developing test practices that could be used to evaluate restraint systems/products. Much of the information on which Plaintiff relies to claim that the "hazards" of the ORS were widely known is information which was shared with and, often times, published by or in conjunction with the SAE. After the SAE protocols were published, PACCAR worked with various contractors in an effort to design/test different safety devices in its cabs, which included conducting rollover tests and viewing the results. PACCAR had tested and even implemented (in other models) the very alternate technologies touted by Plaintiff's expert as a means to limit excursion and increase

survivable space. Conversely, there is no evidence that CVG participated in the SAE task force, was provided SAE data, or joined PACCAR at its various test sites. Therefore, CVG Defendants had no duty to warn a sophisticated manufacturer about alleged dangers and alternative designs already known by the manufacturer.

9.

The issues for determination are as follows:

By the Plaintiff:

- A. Is IMMI strictly liable for defective design and/or failure to warn;
- B. Is IMMI liable for negligent design and/or failure to warn;
- C. Is CVG strictly liable for defective design and/or failure to warn;
- D. Is CVG liable for negligent design and/or failure to warn;
- E. Proximate cause;
- F. The amount of compensatory damages necessary to fully compensate Plaintiff for his paralyzing injuries and permanent quadriplegia; and
- G. Apportionment of fault.

By Defendant IMMI:

- A. Personal Jurisdiction;
- B. Venue;
- C. Strict product liability;
- D. Negligence;
- E. Proximate cause;
- F. Fault apportionment;
- G. Damages;
- H. State of the Art;
- I. Compliance with all laws and regulations.

By the CVG Defendants:

- A. Strict product liability;
- B. Negligence;
- C. Proximate cause;
- D. Fault apportionment;
- E. Damages.

10.

Specifications of negligence including applicable code sections are as follows:

By the Plaintiff:

This is a strict liability product defect and negligence action, with claims against Defendant IMMI and the CVG Defendants for strict liability defective design and failure to warn

as well as claims for negligent design and failure to warn. The applicable statutes, codes, regulations, legal principles, standards and customs or usages, and illustrative case law that Plaintiff contends are applicable to this action include, or may include, the following: O.C.G.A. §§ 51-1-1, 51-1-2, 51-1-6, 51-1-9, 51-1-11, 51-1-11.1, 51-12-1, 51-12-2, 51-12-3, 51-12-7; *Banks v. ICI Americas, Inc.*, 264 Ga. 732 (1994); *Jones v. NordicTrack, Inc.*, 274 Ga. 115 (2001); *Ogletree v. Navistar International Transportation Corp.*, 269 Ga. 443 (1998); *Doyle v. Volkswagenwerk AG*, 267 Ga. 574 (1992); *Chi. Hardware & Fixture Co. v. Letterman*, 236 Ga. App. 21 (1999); *Alltrade, Inc. v. McDonald*, 213 Ga. App. 758 (1994); *Nelson v. C.M. City, Inc.*, 218 Ga. App. 850 (1995); *Buchan v. Lawrence Metal Prod., Inc.*, 270 Ga. App. 517 (2004); *Allstate Ins. Co. v. Sutton*, 290 Ga. App. 154 (2008); *Villegas v. Deere & Co.*, 135 Fed.Appx. 279 (11th Cir. 2005); *Thornton v. E.I. Du. Pont De Nemours Co., Inc.*, 22 F.3d 284 (11th Cir. 1994); *Carmical v. Bell Helicopter Textron, Inc.*, 117 F.3d 490 (11th Cir. 1997) (applying Georgia law); *Fletcher v. Water Applications Distribution Group, Inc.*, 333 Ga. App. 693 (2015).

By Defendant IMMI:

The Court previously denied Defendant IMMI's Motion to Apply Foreign Law. As such, IMMI has identified Georgia law relevant to Plaintiff's claims and Defendants' defenses. Nevertheless, IMMI reserves its right to appeal the decision of the Court on this issue and is not waiving same by identifying Georgia law in this Order.

Plaintiff was negligent in his operation of his vehicle by failing to maintain proper control of his vehicle. Plaintiff was cited for driving a vehicle that was not under proper control under Virginia law, and violated Georgia law by his actions. Therefore, Plaintiff is negligent per se for causing the accident. O.C.G.A. § 51-11-7; O.C.G.A. § 51-1-2 et. seq.; O.C.G.A. § 51-12-33; VA Code Ann. § 46.2-853.

IMMI designates Georgia-Pacific LLC, GP Big Island, LLC, Millis Transfer, Inc., PACCAR, Inc. and Kenworth Trucking Company as non-parties who may be wholly or partially at fault in causing the injuries and damages claimed by Plaintiff. (*See Defendant Indiana Mills & Manufacturing, Inc.'s Amended Notice Designating Non-Party Liability and/or Fault Pursuant to O.C.G.A. § 51-12-33, filed October 22, 2019.*) IMMI denies liability to Plaintiff for any amount whatsoever, and hereby serves notice that it will seek to apportion any verdict in this action, wholly or partially, against Georgia-Pacific LLC, GP Big Island, LLC, Millis Transfer, Inc., PACCAR, Inc. and Kenworth Trucking Company as provided by O.C.G.A. § 51-12-33.

By the CVG Defendants:

Plaintiff was negligent in his operation of his vehicle by failing to maintain proper control of his vehicle. O.C.G.A. sec. 51-11-7; OCGA sec. 51-1-2 et. seq.

As noted above in CVG Defendants' outline of the case, CVG Defendants did not manufacture the final product at-issue or ORS. This was done by former-Defendants PACCAR, Inc. and Kenworth Trucking Company. As a result, CVG Defendants designate Georgia-Pacific LLC, GP Big Island, LLC, Millis Transfer, Inc., PACCAR, Inc. and Kenworth Trucking Company as non-parties who may be wholly or partially at fault in causing the injuries and damages claimed by Plaintiff. CVG Defendants deny liability to Plaintiff for any amount

whatsoever, and hereby serves notice that it will seek to apportion any verdict in this action, wholly or partially, against Georgia-Pacific LLC, GP Big Island, LLC, Millis Transfer, Inc., PACCAR, Inc. and Kenworth Trucking Company as provided by O.C.G.A. § 51-12-33.

In addition to the statutes and case law cited in Plaintiff's specifications of negligence, CVG Defendants rely on and incorporate by reference the statutes and case law cited in CVG Defendants' *Brief in Support of Motion for Summary Judgment: Morgan v. Mar-Bel, Inc.*, 614 F.Supp. 438 (N.D. Ga. 1985); *Davenport v. Cummins Alabama, Inc.*, 284 Ga. App. 666 (2007); *Robert F. Bullock, Inc. v. Thorpe*, 256 Ga. 744, 745 (1987); *Coast Catamaran Corp. v. Mann*, 171 Ga. App. 844 (1984); *Parker v. Schmiede Machine and Tool Corp.*, 445 Fed.Appx. 231 (11th Cir. 2011); *Stuckey v. Northern Propane Gas Co.*, 874 F.2d 1563 (1989).

11.

If the case is based on a contract, either oral or written, the terms of the contract are as follows (or, the contract is attached as an Exhibit to this order): Not applicable.

12.

The types of damages and the applicable measure of those damages are stated as follows:

By the Plaintiff:

Plaintiff Josh Hill seeks recovery of damages from Defendant IMMI and the CVG Defendants for past, present, and future medical bills and expenses, life care needs, and other necessary expenses incurred that are incident-related, in amounts to be shown by the evidence at trial.

Plaintiff Josh Hill seeks recovery of damages from Defendant IMMI and the CVG Defendants for all past, present, and future pain and suffering resulting from his incident-related injuries, in an amount to be determined by the enlightened conscience of the jury based upon the evidence adduced at trial, including all past, present, and future mental and emotional pain and suffering resulting from his incident-related injuries.

Plaintiff Josh Hill seeks recovery from Defendant IMMI and the CVG Defendants for any diminished future income and earning capacity proximately flowing from, substantially caused by, or resulting from the subject incident, in amounts to be shown by evidence adduced at trial.

Plaintiff Josh Hill seeks recovery from Defendant IMMI and the CVG Defendants for the loss of full enjoyment of life and disfigurement he has suffered and will continue to suffer as a proximate result of the incident and the injuries sustained therein, in an amount to be determined by the enlightened conscience of the jury based upon the evidence adduced at trial.

By Defendant IMMI:

Defendant IMMI denies that it is liable for Plaintiff's alleged damages. Any damages awarded for pain and suffering should be determined by the enlightened conscience of the jury. Any damages awarded for expenses, including medical expenses, should be limited to the amount paid for the treatment. *See Dennis v. D&F Equip. Sales, Inc.*, No. 7:14-CV-132 (HL), 2016 WL 3753085 (M.D. Ga. July 11, 2016) (holding that "reasonable and necessary" medical expenses are the amounts paid, not the "retail rates"); O.C.G.A. § 51-12-1, 51-12-2; O.C.G.A. § 24-9-921; *see also* Defendants IMMI and CVG's Omnibus Motion in Limine, section B.1. regarding Evidence of Past Medical Expenses in Excess of Amounts Paid, filed on February 3, 2020). Further, Plaintiff must present evidence of the amount of any alleged lost wages before the Court may award damages for lost wages. *See Georgia Suggested Pattern Jury Instructions – Civil 66.201.*

IMMI objects to Plaintiff's allegations of damages resulting from Plaintiff's "loss of full enjoyment of life and disfigurement." Such damages are duplicative of Plaintiff's allegation of damages for "pain and suffering."

By the CVG Defendants:

CVG Defendants deny that they are liable for Plaintiff's alleged damages. Any damages awarded should be determined by the enlightened conscience of the jury.

However, CVG Defendants object to Plaintiff pursuing and/or introducing evidence regarding past medical expenses in excess of the amounts actually paid. Georgia law provides that: "[d]amages may be either general or special, direct or consequential[,]" and "[s]pecial damages are those which *actually* flow from a tortious act; they must be proved in order to be recovered." O.C.G.A. § 51-12-1, -2 (emphasis added). Here, as argued in Defendants' *Omnibus Motion in Limine*, it would be highly prejudicial and unjust to let Plaintiff mislead the jury with "evidence" of rates in medical bills that were never incurred, never chargeable, never paid, and never recoverable under the law.

13.

If the case involves divorce, each party shall present to the court at the pre-trial conference the affidavits required by Rule 24.2: Not Applicable.

14.

The following facts are stipulated: None at this time.

15.

The following is a list of all documentary and physical evidence that will be tendered at the trial by the Plaintiff or Defendants. The parties have not stipulated to the authenticity, relevance or admissibility of any of the documents.

By the Plaintiff: See **Exhibit A**, attached hereto and incorporated herein by this reference.

Plaintiff respectfully reserves the right to amend this list in a timely fashion without delaying trial, to utilize and introduce additional documentary evidence should same be determined relevant (with agreement to disclose the same to opposing counsel in advance of use at trial), and to utilize and introduce documentary and physical evidence for impeachment and credibility purposes.

Further, Plaintiff reserves the right to introduce any documentary, physical, demonstrative evidence listed by any other party as well as any other evidence necessary for the purpose of impeachment or rebuttal.

Plaintiff cannot stipulate as to the authenticity of documents listed by the Defendants because he has not yet had an opportunity to review those exhibits.

By Defendant IMMI: See **Exhibit B**, attached hereto and incorporated herein by this reference.

IMMI respectfully reserves the right to amend this list in a timely fashion without delaying trial, to utilize and introduce additional documentary evidence should same be determined relevant (with agreement to disclose the same to opposing counsel in advance of use at trial), and to utilize and introduce documentary and physical evidence for impeachment and credibility purposes.

Further, IMMI reserves the right to introduce any documentary, physical, demonstrative evidence listed by any other party as well as any other evidence necessary for the purpose of impeachment or rebuttal.

By the CVG Defendants: See **Exhibit C**, attached hereto and incorporated herein by this reference.

CVG Defendants reserve the right to introduce any documentary, physical, demonstrative evidence listed by any other party as well as any other evidence necessary for the purpose of impeachment or rebuttal.

16.

Special authorities relied upon by the Plaintiff relating to peculiar evidentiary or other legal questions are as follows:

At this time, Plaintiff does not anticipate any peculiar evidentiary or other legal questions other than to the extent any such questions are raised in his pending Omnibus Motions *in Limine* and/or in Plaintiff's responsive pleadings to Defendant IMMI and the CVG Defendants' various Motions *in Limine*—detailed in Paragraph 3 above. Plaintiff does, however, request the opportunity to submit trial briefs to address any issues that may arise before or during the trial.

17.

Special authorities relied upon by Defendant IMMI relating to peculiar evidentiary or other legal questions are as follows:

IMMI incorporates by reference the arguments and law cited within the following motions and briefs in support:

1. Defendants IMMI and CVG's Motion to Dismiss for Forum *Non Conveniens*, or in the Alternative, to Transfer Venue and Brief in Support;
 2. Defendant IMMI's Motion for Summary Judgment and Brief in Support;
 3. Defendant IMMI's Motion *in Limine* and Incorporated Brief Regarding Seatbelt-Mounted Pretensioners
 4. Defendant IMMI and the CVG Defendants' Motion *in Limine* and Incorporated Brief Regarding Documents from Unrelated Lawsuit
 5. Defendant IMMI and the CVG Defendants' Motion *in Limine* and Incorporated Brief Regarding Load Shift Arguments
- Defendant IMMI and the CVG Defendants' Omnibus Motions *in Limine*

IMMI understands that the Court intends to hear arguments regarding whether Defendants would be entitled to a set-off any potential award in favor of Plaintiff from settlement amounts paid to Plaintiff by former-Defendants PACCAR, Inc. and Kenworth Trucking Company. IMMI requests the opportunity to submit trial briefs to address any issues that may arise before or during trial.

18.

Special authorities relied upon by the CVG Defendants relating to peculiar evidentiary or other legal questions are as follows:

CVG Defendants understand that the Court intends to hear arguments regarding whether Defendants would be entitled to a set-off any potential award in favor of Plaintiff from settlement amounts paid to Plaintiff by former-Defendants PACCAR, Inc. and Kenworth Trucking Company. CVG Defendants also request the opportunity to submit trial briefs to address any issues that may arise before or during trial.

19.

All requests to charge anticipated at the time of trial will be filed in accordance with Rule 10.3.

By the Plaintiffs: Pursuant to Uniform Superior Court Rule 10.3, Plaintiff will file requests to charge at the commencement of trial. Plaintiff reserves the right to submit additional jury charges as supported by the evidence admitted at trial.

By Defendant IMMI: Defendant IMMI will also file requests to charge at the commencement of trial. IMMI reserves the right to submit additional jury charges as supported by the evidence admitted at trial.

By the CVG Defendants: CVG Defendants will also file request to charge at the commencement of trial.

20.

The testimony of the following persons may be introduced by depositions:

By the Plaintiff:

1. PACCAR's 30(b)(6) Corporate Representative
2. The CVG Defendants' 30(b)(6) Corporate Representative(s)
3. Mike Leakey
4. Millis Transfer Inc.'s 30(b)(6) Corporate Representative
5. Plaintiff Joshua Kyle Hill
6. Trooper David Cepelnik
7. Anne Hunt
8. Lynn Wray
9. Josh Turner
10. Darrell Van Ness
11. Damon Stultz
12. Dr. John Lin
13. Dr. Eva Shaw
14. Clifford Hill
15. Any person who has been deposed in the case or is deposed in advance of trial who is unavailable pursuant to any of the applicable provisions of O.C.G.A. 9-11-32(3); and
16. Any other person as ruled by the Court using its discretion under O.C.G.A. 9-11-32(4).

By Defendant IMMI:

1. PACCAR's 30(b)(6) Corporate Representative (Larry Bean, deposed on September 5, 2019);
2. Millis Transfer's 30(b)(6) Corporate Representative (Dan Millis, deposed June 26, 2019)
3. Dan Millis (deposed on June 26, 2019);
4. Clifford Hill (deposed January 9, 2020);
5. Darrell Van Ness (deposed on June 21, 2019);
6. Damon Stultz (deposed on June 21, 2019);
7. Josh Turner (deposed on March 21, 2019);
8. Lynn Wray (deposed on March 21, 2019);
9. David Cepelnik (deposed on March 20, 2019);
10. Anne Hunt (deposed on March 20, 2019);
11. Johnathan Eisenstat (deposed on June 18, 2019);
17. Georgia Pacific LLC (deposition by written question);

18. Any person who has been deposed in the case or is deposed in advance of trial who is unavailable pursuant to any of the applicable provisions of O.C.G.A. 9-11-32(3); and
19. Any other person as ruled by the Court using its discretion under O.C.G.A. 9-11-32(4).

By the CVG Defendants:

1. PACCAR's 30(b)(6) Corporate Representative
2. Millis Transfer Inc.'s 30(b)(6) Corporate Representative
3. Dan Millis
4. The CVG Defendants' 30(b)(6) Corporate Representative(s)
5. Plaintiff Joshua Kyle Hill
6. Trooper David Cepelnik
7. Anne Hunt
8. Lynn Wray
9. Josh Turner
10. Darrell Van Ness
11. Damon Stultz
12. Dr. John Lin
13. Dr. Eva Shaw
14. Clifford Hill
15. Johnathan Eisenstat
16. Georgia Pacific LLC (deposition by written question)
17. Any person who has been deposed in the case or is deposed in advance of trial who is unavailable pursuant to any of the applicable provisions of O.C.G.A. 9-11-32(3); and
18. Any other person as ruled by the Court using its discretion under O.C.G.A. 9-11-32(4).

21.

The following are lists of witnesses:

(a) **Plaintiff will have present at trial:** Plaintiff Josh Hill will be present to meet the jury during *voir dire* and to testify during the case, but will not be present for the entirety of the trial due to his health conditions, unless so ordered by the Court.

(b) **Plaintiff may have present at trial:**

1. Josh Hill
2. Michael A. Sutton, P.E.
3. Steven E. Meyer, P.E.
4. Paul R. Lewis, Jr., M.S., BME
5. Jonathan Eisenstat, M.D.
6. Sam Bedwell
7. Ryan Hoover

8. Maria K. Vargas, MS, CRC, CLCP
9. George H. Page, MS, CVE, CDMS, CCM, PVE
10. J.C. Poindexter, Ph.D.
11. Clifford Hill
12. Jason Duvall
13. Alex Presley
14. Plaintiff may also have the following witnesses present at trial: any records custodian needed for authentication of documents, any impeachment or rebuttal witnesses, and any witness listed by Defendant IMMI and/or the CVG Defendants.

Plaintiff reserves the right to amend, modify and/or supplement this Paragraph at any time prior to the trial of this action. Plaintiff further reserves the right to object to any and all witnesses listed by Defendant IMMI and/or the CVG Defendants at any time prior to the trial of this action. Finally, Plaintiff objects to any witness not previously disclosed or identified by Defendant IMMI or the CVG Defendants during discovery in this matter.

(c) **Defendant IMMI will have present at trial:** None.

(d) **Defendant IMMI may have present at trial:**

1. Ryan Hoover
2. Samuel Bedwell
3. Mike Leakey
4. James Chinni
5. Chimba Mkandawire
6. Kevan Granat
7. Thomas Hartman
8. Sharon Hill
9. Records custodians needed for authentication of documents. Witnesses necessary for impeachment or rebuttal.
10. Any witnesses identified on any other party's witness list.

IMM reserves the right to amend, modify, and/or supplement this Paragraph at any time prior to the trial of this action. IMMI reserves also reserve the right to object to any and all witnesses identified by Plaintiff at any time prior to the trial of this action.

(e) **The CVG Defendants will have present at trial:** None.

(f) **The CVG Defendants may have present at trial:**

1. Larry Blankenship
2. Gordon Cooley
3. Lawrence Bean
4. David Cepelnik
5. James Chinni
6. Jonathan Eisenstat

7. Kevan Granat
8. Thomas Hartman
9. Joshua Hill
10. Sharon Hill
11. Clifford Charles Hill
12. Anne Hunt
13. Joe Kent
14. Tyler Kress
15. Robert Lange
16. Mike Leakey
17. Paul Lewis
18. Dr. John Lin
19. Steven Meyer
20. Dan Millis
21. Chimba Mkandawire
22. George Page
23. Lee Powell
24. Dr. Eva Shaw
25. Damon Stultz
26. Mike Sutton
27. Josh Turner
28. Darrell VanNess
29. Maria Vargas
30. Lynn Wray
31. Any witness needed to authenticate any document
32. Any witness needed for rebuttal or impeachment
33. Any witness listed by any other party

CVG Defendants reserve the right to amend, modify, and/or supplement this list at any time prior to the trial of this action. CVG Defendants also reserve the right to object to any and all witnesses identified by Plaintiff at any time prior to the trial of this action.

22.

The form of all possible verdicts to be considered by the jury is as follows:

By the Plaintiff: Plaintiff will confer with Defendant IMMI and the CVG Defendants and attempt to submit a mutually agreeable verdict form. If a mutually agreeable verdict form cannot be reached, then Plaintiff will submit a proposed verdict form prior to the commencement of trial.

By Defendant IMMI: Defendant IMMI will confer with Defendant CVG and Plaintiff attempt to submit a mutually agreeable verdict form. If a mutually agreeable verdict form cannot be reached, then IMMI will submit a proposed verdict form prior to the commencement of trial.

By the CVG Defendants: CVG Defendants will similarly confer with Defendant IMMI and Plaintiff attempt to submit a mutually agreeable verdict form. If a mutually agreeable verdict form cannot be reached, then CVG Defendants will submit a proposed verdict form prior to the commencement of trial.

23.

- (a) The possibilities of settling the case are: Low.
- (b) The parties do want the case reported.
- (c) The cost of takedown will be shared equally by the parties: 1/3 to Plaintiff; 1/3 to Defendant IMMI; and 1/3 to the CVG Defendants.
- (d) Other Matters:

By the Plaintiff: None.

By Defendant IMMI: None

By the CVG Defendants: None.

Respectfully submitted, this 10th day of February 2020.

Respectfully Submitted by:

/s/ Cale Conley

Cale Conley (signed with express permission by Terry O. Brantley)

Georgia Bar No. 181080

Scott Farrow

Georgia Bar No. 256019

Davis Popper

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-and-

/s/ Frederick N. Sager, Jr.

Frederick N. Sager, Jr. (*signed with express permission by Terry O. Brantley*)

Georgia Bar No. 622070

Christopher T. Byrd

Georgia Bar No. 100854
Benjamin P. Ralston
Georgia Bar No. 918489

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Suite 2400
Atlanta, Georgia 30326
*Counsel for Defendants Commercial Vehicle Group, Inc. and CVG National Seating Company,
LLC (f/k/a National Seating Company)*

It is hereby ordered that the foregoing, including attachments thereto, constitutes the CONSOLIDATED PRE- TRIAL ORDER in the above case and supersedes the pleadings, which may not be further amended except by order of the Court to prevent manifest injustice.

This ____ day of _____, 2020.

EMILY J. BRANTLEY, Judge
State Court of Gwinnet County

LR11655.0656144 4846-0802-1684v1

EXHIBIT A

Ex. No.	Exhibit Name	Description and/or Location of Exhibit
1	Virginia State Police Report (Handwritten)	Exhibit No. 3 to Deposition of Trooper David Cepelnik
2	Virginia State Police Report (Typed)	Exhibit No. 4 to Deposition of Trooper David Cepelnik
3	Virginia State Police Scene Photographs	Exhibit No. 2 to Deposition of Trooper David Cepelnik (4 Photos)
4	Franklin County Public Safety Prehospital Care Report	Exhibit No. 2 to Deposition of Leonard Wray
5	Burnt Chimney Fire Department Report	Exhibit No. 1 to Deposition of Lee Powell
6	Burnt Chimney Fire Department Run Sheet	Exhibit No. 2 to Deposition of Lee Powell
7	Eyewitness Anne Hunt Scene Photographs	Exhibit No. 2 to Deposition of Anne Hunt (7 Photos)
8	Foxfire Towing Scene Photographs	HILL-OD 04770-5134 (365 Photos)
9	Photographs of Plaintiff Taken By Sharon Hill	HILL 002172-2547
10	Photographs of Plaintiff From Facebook	HILL 002680-2885
11	1991 UMTRI Heavy Truck Cab Safety Study	PKJH 01314-01362
12	1991 SAE Forms Heavy Truck Task Force	PKJH 01365, 01421, 01635, 01823-24, and 03107
13	1992 National Seating Awarded Kenworth Standard Seat	CVG 000210-12
14	March 1994 PACCAR Restraint System Request to IMMI	PKJH08829-33
15	June 1994 IMMI Files First Patent for SOARS	IMMI 002214-002222
16	July 1994 IMMI Interoffice Memo re: Meeting at PACCAR Technical Center	PKJH08837-38
17	1995 Kenworth B3 cab model series first introduced on market	PACCAR's Responses to Plaintiff's First Interrogatories
18	March 1995 SAE Publishes Phase 1 Results	PKJH 01530-31
19	September 1995 IMMI receives first SOARS patent	IMMI 2214-2222
20	April 1996 IMMI Report on PACCAR Visit	PKJH08843-47
21	September 1996 IMMI rollover SOARS testing in Freightliner	IMMI 000481, 000617-18
22	1997 IMMI Philosophy of Truck Safety Integration Flyer	IMMI 000462-466
23	January 1997 IMMI rollover SOARS testing with National Seating suspension seats	IMMI_001081-88
24	April 1997 SAE completes Phase III	PKJH 03161-75
25	November 1997 IMMI Head Contact Study	IMMI 001476-77, 001489-99, 001722-1755
26	July 1999 IMMI files second SOARS patent	IMMI 002223
27	October 1999 IMMI/PACCAR Rollover Simulation Project	PPAM08900-03
28	2000 CVG Acquires National Seating Company	http://cvgrp.com/about/looking-back/
29	February 2000 IMMI and PACCAR enter NDA for Rollover Simulation Project	PPAM08663-70, 08937
30	January 2001 IMMI and PACCAR Long Term Supply Agreement	IMMI 000026-28
31	June 2001 IMMI Presentation re: Rollover Protection Systems	PKJH08724-37
32	November 2001 IMMI receives second SOARS patent	IMMI_002223
33	September 2002 CVG future seat development plans presentation at PACCAR	PPAM06423-25
34	June 2003 IMMI launches RollTek in fire truck industry	IMMI 000095-98
35	2006 Oshkosh trucking company launches RollTek in concrete mixers	IMMI 000095-98
36	2007 Chinni SAE paper on RollTek effectiveness	IMMI 002291-97
37	2007 IMMI RollTek proposal to Peterbilt	IMMI 000092-94
38	2007 IMMI presents RollTek to PACCAR	IMMI 00079-88
39	August 2007 RollTek available on Freightliner Cascadia	IMMI 000095-98
40	January 2008 Rollover testing of Peterbilt cab at IMMI's CAPE	IMMI 002298-2355
41	2008 IMMI presents RollTek to CVG National Seating	CVG/NS/2 00007-11
42	2009 RollTek integrated into Peterbilt cabs	IMMI_000078, 95-98

Ex. No.	Exhibit Name	Description and/or Location of Exhibit
43	May 2009 PACCAR Seat Technical Requirements Spec. TRS022101	Exhibit 9 to Deposition of Robert Lange
44	June 2009 RollTek deployment case study - Flagstaff, Arizona	PKJH 06407
45	October 2009 Rolltek deployment case study - Sparks, Nevada	IMMI_000106; PKJH 06406
46	CVG 2009 Annual Report and Letter to Stockholders	CVG/TX CONFIDENTIAL 000143-268
47	September 2010 subject IMMI seatbelt system released for production	IMMI_00001-3
48	2013 IMMI presentation to CVG re: RollTek for National Seating	CVG/NS/2 00002-7, 11-24, 41-44
49	February 2013 subject IMMI seatbelt system shipped to CVG National Seating	CVG00002-11 and IMMI_0004-5
50	March 2013 subject tractor-trailer sold	PKJH 05266-83, 5308-5316
51	2015 CVG begins offering RollTek on National Seating platform	CVG 000178, CVG/NS/2 000041-44
52	2015 Kenworth begins offering RollTek	PKJH 05257 and IMMI_001938-2212
53	Indiana Mills & Manufacturing Inc.'s Corporate Brochure	Exhibit T to Plaintiff's Consolidated Opposition to Defendants' Motions for Summary Judgment
54	RollTek promotional materials	IMMI-MERAS_0008677; IMMI_010342; PKJH 07779
55	2008 testing materials (and accompanying videos)	IMMI_002298-2299 - 4811-5276-1749.1; IMMI_2300-2355 - 4823-4433-7301.1
56	2013 testing materials (and accompanying videos)	IMMI_001938-2212; IMMI_00367-378
57	Rollover demo tape S4 vs. non-S4	IMMI_000461
58	RollTek application	IMMI_000366
59	PACCAR roof testing	PKJH 05545
60	Other RollTek promotional materials	IMMI_000379-384; PKJH 07780
61	IMMI suspension seat installation guide	IMMI_000345-353
62	CVG Seat System Patent	CVG/NS/3 000021-35
63	Occupants Kinematics and Restraint Effectiveness during a Quarter-Turn Rollover in a Heavy Truck	SAE Technical Paper Series 2004-01-0327
64	30(b)(6) PACCAR Deposition Transcript	
65	Ex. 1 to 30(b)(6) Paccar Deposition	PKJH 00001-00093 Chassis 391764; Build Date 3-5-13; Plant Chillicothe
66	Ex. 2 to 30(b)(6) Paccar Deposition	PKJH 05308-05316 VIN 1XKADP9X1EJ391764
67	Ex. 3 to 30(b)(6) Paccar Deposition	PKJH 05149-05156 Paccar Corporate Standard Product Design Compliance, 12-4-12
68	Ex. 4 to 30(b)(6) Paccar Deposition	PKJH 05343-05356 T603 Aerocab Day-Cab Seat Assembly Pull, Final Report, 11-19-96
69	Ex. 5 to 30(b)(6) Paccar Deposition	PPAM12195-12209 Peterbilt National 2000 Seats, Final Report, 11-28-00
70	Ex. 6 to 30(b)(6) Paccar Deposition	PKJH 05331-05342 ICP Bar Revision, Final Report, 4-21-06
71	Ex. 7 to 30(b)(6) Paccar Deposition	PKJH05890-05898 Engineering Change Notice, Tether Belt, 12-4-09
72	Ex. 8 to 30(b)(6) Paccar Deposition	PKJH05386-05412 Engineering Change Notice, Bulkhead Air Fitting Change, 8-6-07
73	Ex. 9 to 30(b)(6) Paccar Deposition	CVG 000213-000218 Drawing, Seat Assy Kenworth Air Cushion Plus
74	Ex. 10 to 30(b)(6) Paccar Deposition	PKJH08469-08480 Occupant Protection Technology Rollover Protection Feasibility Study, Final Report, 10-5-98
75	Ex. 11 to 30(b)(6) Paccar Deposition	PPAM09032-PPAM09046 Recaro Integrated Seat Pull, Final Report, 5-23-97
76	Ex. 12 to 30(b)(6) Paccar Deposition	PowerPoint, RollTek, 25 March 2013
77	Ex. 13 to 30(b)(6) Paccar Deposition	PowerPoint, Paccar Inc. Gemini RollTek Seat, Peterbilt, Jeff Plato
78	Ex. 14 to 30(b)(6) Paccar Deposition	Six Sigma Project Charter, RollTek Seats in Gemini 579 Fleet
79	Ex. 15 to 30(b)(6) Paccar Deposition	Kenworth Truck Company Purchase order, 8-26-13
80	Ex. 16 to 30(b)(6) Paccar Deposition	Document, For detailed instructions refer to Paccar Corporate Standard CSO198 Failure Mode and Effects Analysis and SAE J1739
81	Ex. 17 to 30(b)(6) Paccar Deposition	PKJH05902 Spreadsheet, Peterbilt and Kenworth Trucks Ordered with RollTek Seats
82	Ex. 18 to 30(b)(6) Paccar Deposition	RollTek Rollover Protection System, Final report, 3-8-10
83	Ex. 19 to 30(b)(6) Paccar Deposition	RollTek AB10 Controller Testing and Validation, Final Report, 9-12-11
84	Ex. 20 to 30(b)(6) Paccar Deposition	RollTek Rollover Protection System – Electrical Testing and Validation, Final Report, 12-14-09

Ex. No.	Exhibit Name	Description and/or Location of Exhibit
85	Ex. 21 to 30(b)(6) Paccar Deposition	IMMI_000001-000003 Product Description Sheet, Part F106509
86	Ex. 22 to 30(b)(6) Paccar Deposition	CVG 000003 Drawing, 18" Kenworth 2000 – Air Cushion Plus, 11-12-07
87	Ex. 23 to 30(b)(6) Paccar Deposition	Long Term Supply Agreement between Paccar and IMMI, 1-1-10
88	Ex. 24 to 30(b)(6) Paccar Deposition	CVG 000014-000176 Long Term Supply Agreement between Paccar and CVG, 11-1-12
89	Ex. 25 to 30(b)(6) Paccar Deposition	Summary of Opinions, Tyler Kress, PhD
90	Mike Sutton Deposition Transcript	
91	Ex. 1 to Michael A. Sutton, P.E. Deposition	Handwritten Calculation, 3pages
92	Ex. 3 to Michael A. Sutton, P.E. Deposition	List of 15 Opinions of Mike Sutton
93	Ex. 4 to Michael A. Sutton, P.E. Deposition	CV of Michael A. Sutton, PE
94	Ex. 5 to Michael A. Sutton, P.E. Deposition	Pages 600-616 from the Northwestern Traffic Accident Reconstruction Book addressing heavy truck rollovers
95	Ex. 6 to Michael A. Sutton, P.E. Deposition	Photos (3) of Google Street Views of Hwy 122 October 2015
96	Ex. 7 to Michael A. Sutton, P.E. Deposition	Screen shots (5), of PC-Crash simulations
97	Ex. 8 to Michael A. Sutton, P.E. Deposition	Photo of scene with hand markings, Bates No. HILL-OD04916
98	Ex. 9 to Michael A. Sutton, P.E. Deposition	Photo of scene, Bates No. HILL-OD04880
99	Ex. 10 to Michael A. Sutton, P.E. Deposition	Photo of tractor at the scene
100	Ex. 11 to Michael A. Sutton, P.E. Deposition	Photos (4) of highway and overturned tractor-trailer at the scene
101	Ex. 12 to Michael A. Sutton, P.E. Deposition	Photo of crease/gouge marks in the yard
102	Ex. 13 to Michael A. Sutton, P.E. Deposition	Photo of scene and tractor-trailer after it was uprighted
103	Ex. 14 to Michael A. Sutton, P.E. Deposition	Google Street View, VA-122, October 2015, fence and trees in yard
104	Ex. 15 to Michael A. Sutton, P.E. Deposition	Photo of tractor cab in Wisconsin
105	Ex. 16 to Michael A. Sutton, P.E. Deposition	Handwritten calculations, 1 page
106	Ex. 17 to Michael A. Sutton, P.E. Deposition	Photo of tractor cab in Wisconsin
107	Ex. 18 to Michael A. Sutton, P.E. Deposition	Photo of lug nuts on wheel
108	Ex. 19 to Michael A. Sutton, P.E. Deposition	Photo of seat belt
109	Ex. 20 to Michael A. Sutton, P.E. Deposition	Photo of front seat of cab and seat belt
110	Ex. 21 to Michael A. Sutton, P.E. Deposition	Photo of front seat of cab and seat belt
111	Ex. 22 to Michael A. Sutton, P.E. Deposition	Photo of front seat of cab and seat belt
112	Ex. 23 to Michael A. Sutton, P.E. Deposition	Photo of front seat of cab and seat belt
113	Ex. 24 to Michael A. Sutton, P.E. Deposition	Photo of steering wheel, dash area and windshield area of the cab
114	Ex. 25 to Michael A. Sutton, P.E. Deposition	Handwritten notes, 7 pages
115	Ex. 26 to Michael A. Sutton, P.E. Deposition	Diagram from "Parameter Measurements of a Highway Tractor and Semitrailer based on UMTRI-95-47 Final Report"
116	Ex. 27 to Michael A. Sutton, P.E. Deposition	Excerpts from "Parameter Measurements of a Highway Tractor and Semitrailer, UMTRI-95-47 Final Report," 7 pages and 1 additional page
117	Ex. 28 to Michael A. Sutton, P.E. Deposition	Excerpts from PC-Crash Report, 3 pages
118	Front View Tractor Trailer Elevations.JPG	Mike Sutton Expert File
119	Google Street View Photos October 2015	Mike Sutton Expert File
120	Side View Tractor Trailer Elevations.JPG	Mike Sutton Expert File
121	Mike Sutton Scene Photos	Mike Sutton Expert File
122	Mike Sutton Cab Photos	Mike Sutton Expert File
123	Mike Sutton Trailer Photos	Mike Sutton Expert File
124	Mike Sutton PC-Crash Animations	Mike Sutton Expert File
125	Steve Meyer Deposition Transcript	
126	Ex. 1 to Steven Meyer, P.E. Deposition	Flash Drive containing expert file
127	Ex. 2 to Steven Meyer, P.E. Deposition	List of Depositions Received and Summaries
128	Ex. 3 to Steven Meyer, P.E. Deposition	Pages 1 and 2 Paccar's Answer to Interrogatories

Ex. No.	Exhibit Name	Description and/or Location of Exhibit
129	Ex. 4 to Steven Meyer, P.E. Deposition	Index for Flash Drive (3 Pages)
130	Ex. 5 to Steven Meyer, P.E. Deposition	MTE Photos
131	Ex. 6 to Steven Meyer, P.E. Deposition	Summary of Opinions (1 Pages)
132	Ex. 7 to Steven Meyer, P.E. Deposition	IMMI Acronym Index
133	Ex. 8 to Steven Meyer, P.E. Deposition	Witness Summary Table
134	Ex. 9 to Steven Meyer, P.E. Deposition	Invoices
135	Ex. 10 to Steven Meyer, P.E. Deposition	4/2/19 Inspection Photos (331-632)
136	Ex. 11 to Steven Meyer, P.E. Deposition	Photographs of Exemplar Vehicle (1-330)
137	Ex. 12 to Steven Meyer, P.E. Deposition	Traffic safety facts 2015
138	Ex. 13 to Steven Meyer, P.E. Deposition	NHTSA Heavy Truck Crashworthiness publication
139	Meyer 10/22/19 Vehicle Inspection Photographs	Photographs produced to Defense counsel
140	Meyer Misc Refs - ABTS	Steve Meyer expert file
141	Meyer Misc Refs - Belt perf	Steve Meyer expert file
142	Meyer Misc Refs - Eject timeline	Steve Meyer expert file
143	Meyer Misc Refs - glazing-Occ retention	Steve Meyer expert file
144	Meyer Misc Refs - Heavy truck misc	Steve Meyer expert file
145	Meyer Misc Refs - Heavy truck timeline	Steve Meyer expert file
146	Meyer Misc Refs - Misc SAFE refs	Steve Meyer expert file
147	Meyer Misc Refs - Occ Protect Timeline	Steve Meyer expert file
148	SAFE Veh Insp 9-11-18 photos	Steve Meyer expert file
149	SEM Veh Insp 4-2-19 photos	Steve Meyer expert file
150	SEM Exem-Surr 4-2-19 photos	Steve Meyer expert file
151	Meyer CV / Qualifications	Meyer scanned depo file (tab 1)
152	Meyer legals	Meyer scanned depo file (tab 2)
153	Meyer Police Report etc.	Meyer scanned depo file (tab 3)
154	Meyer depo summs	Meyer scanned depo file (tab 4)
155	Meyer medicals	Meyer scanned depo file (tab 5)
156	Meyer vehicle data	Meyer scanned depo file (tab 6)
157	Meyer vehicle inspection	Meyer scanned depo file (tab 7)
158	Meyer restraint insp	Meyer scanned depo file (tab 8)
159	Meyer exemplar surr	Meyer scanned depo file (tab 9)
160	Meyer discovery	Meyer scanned depo file (tab 10)
161	Attenuating Head Impact with Vehicular (Including Heavy Truck) Interiors	Publication, 2012 ESAR, Meyer et al.
162	Quasi-Static and Dynamic Testing as a Basis for Determining Seat Back Strength	Publication, 2008 ASME, Herbst, Meyer et al.
163	Rear Impact Test Methodologies - Quasistatic and Dynamic	Publication, 2009 ESV, Herbst, Meyer et al.
164	IMMI Suspension Seat Tethers	Photographs, Hardware
165	IMMI Adjustable Seat Tethers Installation Guide	IMMI Installation Guide
166	KAB Air Ride ABTS with IMMI Belt	Photographs, Hardware
167	2003 Ford F150 ABTS Belt	Photographs, Hardware
168	1997 Toyota 4Runner Belt	Photographs, Hardware
169	Paul Lewis Deposition Transcript	
170	Ex. 2 to Paul Lewis, M.S., BME Deposition	Paul Lewis's Case Review List
171	Ex. 3 to Paul Lewis, M.S., BME Deposition	Copy of a Heavy Truck Crashworthiness Timeline
172	Ex. 4 to Paul Lewis, M.S., BME Deposition	An updated copy of Paul Lewis's vehicle examination notes

Ex. No.	Exhibit Name	Description and/or Location of Exhibit
173	Ex. 5 to Paul Lewis, M.S., BME Deposition	Updated version of: Paul Lewis's surrogate study document
174	Ex. 7 to Paul Lewis, M.S., BME Deposition	Paul Lewis's vehicle inspection photos
175	Ex. 8 to Paul Lewis, M.S., BME Deposition	Paul Lewis's photographs of the actual latch plate for the truck
176	Ex. 9 to Paul Lewis, M.S., BME Deposition	Copy of all photographs taken by Paul Lewis at the surrogate study
177	Ex. 10 to Paul Lewis, M.S., BME Deposition	Printout of five photos of the vehicle at a storage lot
178	Ex. 11 to Paul Lewis, M.S., BME Deposition	Invoices
179	Ex. 12 to Paul Lewis, M.S., BME Deposition	CV
180	Ex. 13 to Paul Lewis, M.S., BME Deposition	Testimony list
181	Ex. 14 to Paul Lewis, M.S., BME Deposition	Documents related to Mr. Sutton's accident reconstruction
182	Ex. 15 to Paul Lewis, M.S., BME Deposition	Graphs prepared by Mr. Sutton
183	Ex. 16 to Paul Lewis, M.S., BME Deposition	Photograph
184	Ex. 17 to Paul Lewis, M.S., BME Deposition	Photograph
185	Ex. 18 to Paul Lewis, M.S., BME Deposition	Photograph of the cab of the truck
186	Ex. 19 to Paul Lewis, M.S., BME Deposition	Photograph of the cab of the truck
187	Dr. Eisenstat Deposition Transcript	
188	Ex. 2 to Jonathan Eisenstat, MD Deposition	Jonathan Eisenstat, M.D.'s vehicle exam notes
189	Ex. 3 to Jonathan Eisenstat, MD Deposition	Photographs of Joshua Hill
190	Ex. 5 to Jonathan Eisenstat, MD Deposition	Notebook containing printouts of Jonathan Eisenstat, M.D.'s inspection photographs
191	Ex. 6 to Jonathan Eisenstat, MD Deposition	Copy of Jonathan Eisenstat, M.D.'s current curriculum vitae
192	Ex. 7 to Jonathan Eisenstat, MD Deposition	Fee schedule
193	Ex. 8 to Jonathan Eisenstat, MD Deposition	Copy of two invoices produced by Jonathan Eisenstat, M.D.
194	Ex. 9 to Jonathan Eisenstat, MD Deposition	Document titled Materials Reviewed created by Jonathan Eisenstat, M.D.
195	Ex. 10 to Jonathan Eisenstat, MD Deposition	Document titled Documents Received produced by Jonathan Eisenstat, M.D.
196	Ex. 11 to Jonathan Eisenstat, MD Deposition	Plots and documents related to Mr. Sutton's PC crash reconstruction
197	Maria Vargas Deposition Transcript	
198	Ex. 1 to Maria Vargas Deposition	Curriculum Vitae
199	Ex. 2 to Maria Vargas Deposition	Expert Testimony list
200	Ex. 3 to Maria Vargas Deposition	Letter June 1, 2017
201	Ex. 4 to Maria Vargas Deposition	Invoices
202	Ex. 5 to Maria Vargas Deposition	Medical records sheet
203	Ex. 6 to Maria Vargas Deposition	Documents
204	Ex. 7 to Maria Vargas Deposition	Life Care Plan 11/7/17
205	Ex. 8 to Maria Vargas Deposition	Life Care Plan 3/26/19
206	LCP - Vargas 11/7/17	Vargas expert file
207	LCP - UPDATED 3-26-19	Vargas expert file
208	LCP Charts - Vargas	Vargas expert file
209	George Page Deposition Transcript	
210	Ex. 1 to George Page Deposition	Curriculum Vitae of H. Page, MS, CVE, CDMS, CCM
211	Ex. 2 to George Page Deposition	Testimony list
212	Ex. 3 to George Page Deposition	Fee schedule
213	Ex. 4 to George Page Deposition	Vocational Rehabilitation Assessment dated 12-11-18
214	Ex. 5 to George Page Deposition	Addendum to the Vocational Rehabilitation Assessment dated 4-5-19
215	Ex. 6 to George Page Deposition	Notes of Mr. Page
216	Dr. Poindexter Deposition Transcript	
217	Ex. 2 to J.C. Poindexter, Ph. D. Deposition	12-17-18 Report

Ex. No.	Exhibit Name	Description and/or Location of Exhibit
218	Ex. 3 to J.C. Poindexter, Ph. D. Deposition	3-30-19 Report
219	Ex. 4 to J.C. Poindexter, Ph. D. Deposition	10-28-18 Report
220	Ex. 5 to J.C. Poindexter, Ph. D. Deposition	Tax Documentation
221	Ex. 6 to J.C. Poindexter, Ph. D. Deposition	Spreadsheet
222	Ex. 7 to J.C. Poindexter, Ph. D. Deposition	Invoices
223	Ex. 8 to J.C. Poindexter, Ph. D. Deposition	Millis Transfer Pay Scale
224	Ex. 9 to J.C. Poindexter, Ph. D. Deposition	Vocational Rehabilitation Assessment
225	Ex. 10 to J.C. Poindexter, Ph. D. Deposition	Daily Treasury Yield Curve Rates
226	Ex. 11 to J.C. Poindexter, Ph. D. Deposition	Shepherd Center Note
227	Ex. 12 to J.C. Poindexter, Ph. D. Deposition	Life Care Plan
228	Ex. 13 to J.C. Poindexter, Ph. D. Deposition	Curriculum Vitae
229	Josh Hill earnings history	Dr. Poindexter expert file
230	LC-Sum	Dr. Poindexter expert file
231	LC-Sum Update 12-17-18	Dr. Poindexter expert file
232	LC-Sum Update 3-30-19	Dr. Poindexter expert file
233	Report 10-28-18	Dr. Poindexter expert file
234	Report 12-17-18	Dr. Poindexter expert file
235	Report 3-30-19	Dr. Poindexter expert file
236	Jim Chinni Deposition Transcript	
237	Ex. 1 to James Richard Chinni, P.E. Deposition	Opinion Summary
238	Ex. 2 to James Richard Chinni, P.E. Deposition	PowerPoint - Opinion Support
239	Ex. 3 to James Richard Chinni, P.E. Deposition	Handwritten Notes
240	Ex. 4 to James Richard Chinni, P.E. Deposition	Curriculum Vitae
241	Ex. 5 to James Richard Chinni, P.E. Deposition	Flash Drive
242	Ex. 6 to James Richard Chinni, P.E. Deposition	List of Provided Materials
243	Ex. 7 to James Richard Chinni, P.E. Deposition	8-6-19 E-mail from Blake Shelby to Davis Popper
244	Ex. 8 to James Richard Chinni, P.E. Deposition	6.3 Summary from SAE
245	Ex. 9 to James Richard Chinni, P.E. Deposition	Suspension Seat Safety System
246	Ex. 10 to James Richard Chinni, P.E. Deposition	4-17-96 Report on Visit to PACCAR Corporate Purchasing
247	Ex. 11 to James Richard Chinni, P.E. Deposition	Article - "Tractor-Trailer Rollover Crash Test"
248	Ex. 12 to James Richard Chinni, P.E. Deposition	2-15-09 E-mail from Mike Hart to Jose Avila, et al.
249	Ex. 13 to James Richard Chinni, P.E. Deposition	IMMI Case Study
250	Ex. 14 to James Richard Chinni, P.E. Deposition	IMMI Case Study
251	Ex. 17 to James Richard Chinni, P.E. Deposition	Retention Agreement
252	Ex. 18 to James Richard Chinni, P.E. Deposition	Invoices from Engineering Answers, LLC
253	Ex. 19 to James Richard Chinni, P.E. Deposition	Five-Year Testimony History
254	Ex. 20 to James Richard Chinni, P.E. Deposition	List of Professional Publications
255	Ex. 21 to James Richard Chinni, P.E. Deposition	Reference Material Bibliography
256	Ex. 22 to James Richard Chinni, P.E. Deposition	Document Review and Summary
257	Ex. 23 to James Richard Chinni, P.E. Deposition	PowerPoint - IMMI PACCAR Presentation
258	Ex. 24 to James Richard Chinni, P.E. Deposition	Deposition Review and Summary
259	Ex. 25 to James Richard Chinni, P.E. Deposition	Exemplar Seat Belt System Tilt Lock Evaluation
260	Ex. 26 to James Richard Chinni, P.E. Deposition	Field Inspection Checklist
261	Ex. 27 to James Richard Chinni, P.E. Deposition	1-18-19 Vehicle Inspection Checklist
262	Ex. 28 to James Richard Chinni, P.E. Deposition	Belt Map Comparison

Ex. No.	Exhibit Name	Description and/or Location of Exhibit
263	Ex. 29 to James Richard Chinni, P.E. Deposition	6-13-19 Vehicle Inspection Checklist
264	Ex. 30 to James Richard Chinni, P.E. Deposition	Belt Comparison
265	Ex. 31 to James Richard Chinni, P.E. Deposition	7-24-19 Vehicle Inspection Checklist
266	Ex. 32 to James Richard Chinni, P.E. Deposition	Measurements
267	Ex. 33 to James Richard Chinni, P.E. Deposition	Timeline of Events
268	Jim Chinni Deposition Transcript and Exhibits from <i>Meras</i> Case	IMMI 010356-10900
269	Kevan Granat Deposition Transcript	
270	Ex. 2 to Kevan Granat Deposition	Project binder of Kevan Granat
271	Ex. 3 to Kevan Granat Deposition	USB containing project file of Kevan Granat
272	Ex. 4 to Kevan Granat Deposition	Curriculum Vitae of Kevan Granat
273	Ex. 6 to Kevan Granat Deposition	Hill v. IMMI: Summary of Opinions
274	Ex. 7 to Kevan Granat Deposition	Handwritten notes of Dr. Mkandawire, "Kevan Granat Findings"
275	Ex. 8 to Kevan Granat Deposition	Handwritten notes of conversation between Jim Chinni and Kevan Granat
276	Kevan Granat Scene Photos	Kevan Granat Expert File
277	Kevan Granat Cab Photos	Kevan Granat Expert File
278	Dr. Mkandawire Deposition Transcript	
279	Ex. 1 to Chimba Mkandawire, Ph. D. Deposition	Primary Opinions
280	Ex. 2 to Chimba Mkandawire, Ph. D. Deposition	Case Summary
281	Ex. 3 to Chimba Mkandawire, Ph. D. Deposition	Flash drive of Mkandawire File
282	Hill Case Summary Mkandawire Supplement	Supplement to Mkandawire Deposition File
283	Thomas Hartman Deposition Transcript	
284	Ex. 2 to Thomas Hartman Deposition	Thumb drive
285	Ex. 3 to Thomas Hartman Deposition	Opinions
286	Ex. 4 to Thomas Hartman Deposition	Invoice
287	Ex. 5 to Thomas Hartman Deposition	Tom Hartman Depositions
288	Ex. 6 to Thomas Hartman Deposition	Thomas B. Hartman
289	Ex. 7 to Thomas Hartman Deposition	File material
290	Ex. 8 to Thomas Hartman Deposition	Why Safety Belts?
291	Ex. 9 to Thomas Hartman Deposition	2/15/09 e-mail
292	Ex. 10 to Thomas Hartman Deposition	Police Crash Report
293	Joe Kent Deposition Transcript	
294	Ex. 1 to Joe W. Kent, P.E. Deposition	Flash drive
295	Ex. 2 to Joe W. Kent, P.E. Deposition	Flash drive
296	Ex. 3 to Joe W. Kent, P.E. Deposition	Time and Expense Log
297	Ex. 4 to Joe W. Kent, P.E. Deposition	Photograph
298	Ex. 5 to Joe W. Kent, P.E. Deposition	Photograph
299	Ex. 6 to Joe W. Kent, P.E. Deposition	Handwritten notes
300	Ex. 7 to Joe W. Kent, P.E. Deposition	Photograph
301	Ex. 8 to Joe W. Kent, P.E. Deposition	Photograph
302	Ex. 9 to Joe W. Kent, P.E. Deposition	Photograph
303	Ex. 10 to Joe W. Kent, P.E. Deposition	Photograph
304	Ex. 11 to Joe W. Kent, P.E. Deposition	Photograph
305	Ex. 12 to Joe W. Kent, P.E. Deposition	Approx Angles from Scale Model
306	Ex. 13 to Joe W. Kent, P.E. Deposition	Photograph
307	Ex. 14 to Joe W. Kent, P.E. Deposition	Photograph

Ex. No.	Exhibit Name	Description and/or Location of Exhibit
308	Ex. 15 to Joe W. Kent, P.E. Deposition	Photograph
309	Ex. 16 to Joe W. Kent, P.E. Deposition	Handwritten notes
310	Ex. 17 to Joe W. Kent, P.E. Deposition	Photograph
311	Ex. 18 to Joe W. Kent, P.E. Deposition	Photographs
312	Tyler Kress Deposition Transcript	
313	Ex. 1 to Tyler Kress, Ph. D. Deposition	Summary of Opinions
314	Ex. 2 to Tyler Kress, Ph. D. Deposition	Handwritten notes
315	Ex. 3 to Tyler Kress, Ph. D. Deposition	Photograph
316	Ex. 4 to Tyler Kress, Ph. D. Deposition	Photographs
317	Ex. 5 to Tyler Kress, Ph. D. Deposition	Medical Highlights
318	Ex. 6 to Tyler Kress, Ph. D. Deposition	Notes from file
319	Ex. 7 to Tyler Kress, Ph. D. Deposition	Handwritten notes
320	Ex. 8 to Tyler Kress, Ph. D. Deposition	Handwritten notes
321	Ex. 9 to Tyler Kress, Ph. D. Deposition	Handwritten notes
322	Ex. 10 to Tyler Kress, Ph. D. Deposition	Photograph
323	Ex. 11 to Tyler Kress, Ph. D. Deposition	Handwritten notes
324	Ex. 12 to Tyler Kress, Ph. D. Deposition	Handwritten notes
325	Ex. 13 to Tyler Kress, Ph. D. Deposition	Handwritten notes
326	Ex. 14 to Tyler Kress, Ph. D. Deposition	Handwritten notes
327	Ex. 15 to Tyler Kress, Ph. D. Deposition	Handwritten notes
328	Ex. 16 to Tyler Kress, Ph.D. Deposition	Handwritten recon notes
329	Ex. 17 to Tyler Kress, Ph. D. Deposition	CV
330	Robert Lange Deposition Transcript	
331	Ex. 1 to Robert Lange Deposition	Flash Drive containing Mr. Lange's file
332	Ex. 2 to Robert Lange Deposition	Draft Project Notes
333	Ex. 5 to Robert Lange Deposition	Robert Lange CV
334	Ex. 6 to Robert Lange Deposition	Robert Lange Testimony List (4 years)
335	Ex. 7 to Robert Lange Deposition	Robert Lange Retention Letter
336	Ex. 8 to Robert Lange Deposition	Robert Lange Invoices
337	Ex. 9 to Robert Lange Deposition	Excerpt from PACCAR Seat Technical Requirements Specification TRS022101 May 2009
338	Ex. 10 to Robert Lange Deposition	Marked copy of CVG/NS/2 000008-10
339	Michael A. Sutton, P.E. Expert File	Plaintiff reserves the right to amend this list to identify documents provided in Mr. Sutton's expert file that were not marked as an Exhibit at his deposition and/or that have not been specifically identified herein
340	Steven Meyer, P.E. Expert File	Plaintiff reserves the right to amend this list to identify documents provided in Mr. Meyer's expert file that were not marked as an Exhibit at his deposition and/or that have not been specifically identified herein
341	Paul Lewis, M.S., BME Expert File	Plaintiff reserves the right to amend this list to identify documents provided in Mr. Lewis's expert file that were not marked as an Exhibit at his deposition and/or that have not been specifically identified herein
342	Jonathan Eisenstat, MD Expert File	Plaintiff reserves the right to amend this list to identify documents provided in Dr. Eisenstat's expert file that were not marked as an Exhibit at his deposition and/or that have not been specifically identified herein
343	Maria Vargas Expert File	Plaintiff reserves the right to amend this list to identify documents provided in Ms. Vargas's expert file that were not marked as an Exhibit at her deposition and/or that have not been specifically identified herein
344	George Page Expert File	Plaintiff reserves the right to amend this list to identify documents provided in Mr. Page's expert file that were not marked as an Exhibit at his deposition and/or that have not been specifically identified herein
345	J.C. Poindexter, Ph. D. Expert File	Plaintiff reserves the right to amend this list to identify documents provided in Dr. Poindexter's expert file that were not marked as an Exhibit at his deposition and/or that have not been specifically identified herein

Ex. No.	Exhibit Name	Description and/or Location of Exhibit
346	James Richard Chinni, P.E. Expert File	Plaintiff reserves the right to amend this list to identify documents provided in Mr. Chinni's expert file that were not marked as an Exhibit at his deposition and/or that have not been specifically identified herein. Plaintiff further reserves the right to use documents provided in Mr. Chinni's expert file that have not been specifically identified herein for purposes of impeachment and/or cross-examination at trial.
347	Kevan Granat Expert File	Plaintiff reserves the right to amend this list to identify documents provided in Mr. Granat's expert file that were not marked as an Exhibit at his deposition and/or that have not been specifically identified herein. Plaintiff further reserves the right to use documents provided in Mr. Granat's expert file that have not been specifically identified herein for purposes of impeachment and/or cross-examination at trial.
348	Chimba Mkandawire, Ph. D. Expert File	Plaintiff reserves the right to amend this list to identify documents provided in Dr. Mkandawire's expert file that were not marked as an Exhibit at his deposition and/or that have not been specifically identified herein. Plaintiff further reserves the right to use documents provided in Dr. Mkandawire's expert file that have not been specifically identified herein for purposes of impeachment and/or cross-examination at trial.
349	Robert Lange Expert File	Plaintiff reserves the right to amend this list to identify documents provided in Mr. Lange's expert file that were not marked as an Exhibit at his deposition and/or that have not been specifically identified herein. Plaintiff further reserves the right to use documents provided in Mr. Lange's expert file that have not been specifically identified herein for purposes of impeachment and/or cross-examination at trial.
350	Joe W. Kent, P.E. Expert File	Plaintiff reserves the right to amend this list to identify documents provided in Mr. Kent's expert file that were not marked as an Exhibit at his deposition and/or that have not been specifically identified herein. Plaintiff further reserves the right to use documents provided in Mr. Kent's expert file that have not been specifically identified herein for purposes of impeachment and/or cross-examination at trial.
351	Tyler Kress, Ph. D. Expert File	Plaintiff reserves the right to amend this list to identify documents provided in Dr. Kress's expert file that were not marked as an Exhibit at his deposition and/or that have not been specifically identified herein. Plaintiff further reserves the right to use documents provided in Dr. Kress's expert file that have not been specifically identified herein for purposes of impeachment and/or cross-examination at trial.
352	Thomas Hartman Expert File	Plaintiff reserves the right to amend this list to identify documents provided in Mr. Hartman's expert file that were not marked as an Exhibit at his deposition and/or that have not been specifically identified herein. Plaintiff further reserves the right to use documents provided in Mr. Hartman's expert file that have not been specifically identified herein for purposes of impeachment and/or cross-examination at trial.
353		
354	Ex. 1 to Clifford C. Hill Deposition	Photograph
355	Ex. 2 to Clifford C. Hill Deposition	Photograph
356	Ex. 3 to Clifford C. Hill Deposition	Photograph
357	Ex. 4 to Clifford C. Hill Deposition	Photograph
358	Ex. 5 to Clifford C. Hill Deposition	Photograph
359		
360	Ex. 2 to Anne Hunt Deposition	Collection of Photographs
361	Ex. 3 to Anne Hunt Deposition	Photograph/Accident
362	Ex. 4 to Anne Hunt Deposition	Photograph/Mailbox
363	Ex. 5 to Anne Hunt Deposition	Photograph/White line
364	Ex. 6 to Anne Hunt Deposition	Collection of Photographs
365		
366	Ex. 2 to Eva Nicholene Proescholdt Shaw MD Deposition	Curriculum Vitae
367	Ex. 3 to Eva Nicholene Proescholdt Shaw MD Deposition	Records
368	Ex. 5 to Eva Nicholene Proescholdt Shaw MD Deposition	Life Care Plan
369		

Ex. No.	Exhibit Name	Description and/or Location of Exhibit
370	Ex. 1 to Lee Powell Deposition	Image Trend Burnt Chimney Fire Department Report
371	Ex. 2 to Lee Powell Deposition	Burnt Chimney Volunteer Fire Department Company 9 Run Sheet
372		
373	Ex. 3 to Damon Stultz Deposition	Photograph
374	Ex. 4 to Damon Stultz Deposition	Photograph
375		
376	Ex. 5 to Darrell van Ness Deposition	Prehospital Care Report dated 12-28-2015
377	Ex. 6 to Darrell van Ness Deposition	Photograph
378	Ex. 7 to Darrell van Ness Deposition	Photograph
379	Ex. 8 to Darrell van Ness Deposition	Photograph
380		
381	Ex. 2 to David Cepelnik Depositions	Collection of Photographs
382	Ex. 3 to David Cepelnik Depositions	Accident Report/Preliminary
383	Ex. 4 to David Cepelnik Depositions	Accident Report/typed
384		
385	Ex. 2 to Josh Turner Depositions	Prehospital Care Report
386	Ex. 3 to Josh Turner Depositions	Photograph
387	Ex. 4 to Josh Turner Depositions	Photograph
388		
389	Ex. 2 to Lynn Wray Deposition	Prehospital Care Report
390	Ex. 3 to Lynn Wray Deposition	Photograph/seat belt
391	Ex. 4 to Lynn Wray Deposition	Photograph/seat
392	Ex. 5 to Lynn Wray Deposition	Photograph
393	Ex. 6 to Lynn Wray Deposition	Atlas Seat Features
394	Ex. 7 to Lynn Wray Deposition	Photograph/seat
395		
396	HILL001623-001690	Abstract Medical Records from Roanoke Memorial Hospital DOS 12-28-15 thru 1-12-16
397	HILL000001-000412	Medical Records from Shepherd Center
398	HILLSUPP003593-003704	Supplemental Medical Records from Shepherd Center
399	HILL-LIN000001-25	1-15-2020 Follow-up visit with Dr. Lin
400	AS000001-000159	Medical Records from Accord Services
401	HILL000413-000443	Medical Records from Alliance Urology 6-20-16 thru 5-17-17
402	AU000001-000039	Medical Records from Alliance Urology 7-26-16 thru 5-8-18
403	HILLSUPP000040-000042	Medical Record from Alliance Urology 8-15-18
404	HILLSUPP010474	Medical Record from Alliance Urology 4-23-19
405	HILL000444-000470	Medical Records from Bayada Home Health
406	HILLSUPP000055-000063	Medical Records from Bayada Home Health
407	HILLSUPP010483-10835	Medical Records from Bayada Home Health
408	HILL000471-000728	Medical Records from Bright Star Home Care
409	HILLSUPP000064-001236	Medical Records from Bright Star Home Care
410	HILL000729-753	Medical Records from Carolina Neurosurgery
411	HILLSUPP001237-001266	Medical Records from Carolina Neurosurgery
412	HILLSUPP010862-10953	Medical Records from Carolina Neurosurgery
413	HILL000754-001188	Medical Records from Cone Health
414	HILLSUPP001883-002251	Medical Records from Cone Health

Ex. No.	Exhibit Name	Description and/or Location of Exhibit
415	HILLSUPP011344-011884	Medical records from Cone Health
416	HILL001189-001197	Dr. Lofton IME
417	HILL001198-1211	Driver Rehab Services Occupational Therapy Evaluation
418	HILL001212-1216	Franklin County EMS Trip Report
419	HILL001217-1218	Medical Records from Greensboro Imaging
420	HILLSUPP011889-12002	Medical Records from Greensboro Imaging
421	HILL001219-1221	Medical Records from High Point Foot Center
422	HILL001222-1230	Medical Records from LaBauer Gastroenterology
423	HILL001231-1237	Medical Records from Moses Cone Memorial Hospital
424	HILLSUPP002614-3592	Medical Records from Moses Cone Memorial Hospital
425	HILLSUPP012023-12137	Medical Records from Moses Cone Memorial Hospital
426	HILL001238-1605	Medical Records from Paradigm Outcomes
427	HILL001606-1621	Medical Records from Piedmont Hospital
428	HILL001691-1710	Medical Records from Wake Forest Baptist Medical Center
429	HILLSUPP003705-4085	Medical Records from Wake Forest Baptist Medical Center
430	HILLSUPP020138-20151	Medical Records from Wake Forest Baptist Medical Center
431	HILLSUPP020161-020286	Medical Records from Wake Forest Baptist Medical Center
432	HILLSUPP001267-1882	Medical Records from ComForCare
433	HILLSUPP011075-11343	Medical Records from ComForCare
434	HILLSUPP002252-2257	Medical Records from Dr. Erik Shaw
435	HILLSUPP002258-2263	Medical Records from Dr. Eva Shaw
436	HILLSUPP002264-2410	Medical Records from Dr. Lacey
437	HILLSUPP002611-2613	Medical Records from Dr. Karvelas
438	HILLSUPP004265-4268	Medical Records from OneCallCare
439	HILLSUPP016114-19767	Medical Records from OneCallCare
440	HILLSUPP004269-4273	Medical Records from Paragon Case Management
441	HILLSUPP019768-19786	Medical Records from Piedmont Triad Ambulance
442	HILLSUPP019787-20031	Medical Records from Primary Care at Pomona
443	HILLSUPP020034-20037	Medical Records from Randolph Health
444	HILLSUPP012014-2022	Driver Rehab Services Occupational Therapy Re-Evaluation 9-18-2019
445	HILLSUPP020101-103	Medication Record from Shepherd Apothecary
446	HILLSUPP020152-160	Prescription Records from Walgreens
447	Itemization	Medical Bill Itemization 1.28.15 - 1.15.20
448	Joshua Hill Day in the Life	Day in the Life Video
449	The subject tractor-trailer cab	
450	Any and all documents identified in the CVG Defendants' Exhibit List	
451	Any and all documents identified in Defendant IMMI's Exhibit List	
452	Any and all documents necessary for rebuttal or impeachment purposes	
453	Plaintiff reserves the right to amend this list to identify any documents produced by Defendants in this case that were not specifically identified above	
454	Plaintiff reserves the right to amend this list to include any Exhibits marked at any upcoming depositions	
455	Plaintiff reserves the right to amend this list to include any demonstrative exhibits for use at trial	

EXHIBIT B

DEFENDANT INDIANA MILLS & MANUFACTURING, INC.'S TRIAL EXHIBIT LIST

Exhibit No.	Document Description	Bates Label
I 1	IMMI Long Term Supply Agreement	IMMI 6-77 PKJH 5149-5164
I 2	Letter Agreement Amendment to Long Term Supply Agreement	IMMI 450-459
I 3	IMMI seatbelt drawing	IMMI 1-5
I 4	PACCAR seatbelt drawing	PKJH 5899
I 5	Records relating to other rollovers in Millis trucks	MT 1024-1078
I 6	Kenworth T660 Brochure	PKJH 698-733
I 7	KW Data Book showing options	PKJH 5266-5283
I 8	Chassis Build Document	PKJH 00001-93
I 9	PACCAR DTPO	
I 10	IMMI seatbelt installation guide	IMMI 345-353
I 11	Press Release showing RollTek available in Atlas seat	PKJH 5257-5268
I 12	PACCAR trucks ordered with RollTek	PKJH 5902
I 13	PACCAR RollTek project Final Report	PKJH 5903-6137
I 14	PFMEA for RollTek	PKJH 6252
I 15	RollTek PowerPoint November 28, 2007	PKJH 6322-6345
I 16	CAPE Quote to KW Aug. 22, 2012 – RollTek Development	PKJH 6422-6426
I 17	CAPE Quote to KW Sept. 18, 2013 – RollTek Development	PKJH 7542
I 18	CAPE Quote to KW July 22, 2013 – RollTek Development	PKJH 7552
I 19	CAPE Quote to KW March 7, 2013 – RollTek Development	PKJH 7559
I 20	Kenworth NGP rollover test – September 2013	PKJH 6722-7406
I 21	RollTek 2005 mini CD	IMMI 366
I 22	Rollover demo tape	IMMI 354
I 23	S4 pretensioner seat marketing material	IMMI 463
I 24	Test data for S4 vs. non-S4 demo video	IMMI 799-831
I 25	Test data for S4 vs. non-S4 demo video	IMMI 965-991
I 26	Video Rollover Demo S-4 vs. non-S4 demo video	IMMI 461

Exhibit No.	Document Description	Bates Label
I 27	Advanced Occupant Protection Systems Marketing Materials	IMMI 464-466
I 28	IMMI S4 patent	IMMI 010453-010461
I 29	NHTSA Heavy Truck Crashworthiness Publication	Meyer Ex. 13
I 30	NHTSA Traffic Safety Facts	Meyer Ex. 12
I 31	RollTek patent	IMMI 010622
I 32	Email from Bedwell to Bean re: Rollover Protection 6/6/02	IMMI 010639
I 33	Bedwell memo to Bean 8/16/01 – Rollover Program Costs	IMMI 010640-010644
I 34	Letter from IMMI to PACCAR about new truck restraint technology – 9/8/96	IMMI 010649-10650
I 35	IMMI presentation to PACCAR 6/6/01	IMMI 010656-10669
I 36	IMMI letter to PACCAR re: rollover occupant protection w/ quote	IMMI 010727-10728
I 37	RollTek Product Integration Document	IMMI 010847-010861
I 38	S4S for RollTek Product Integration Document	IMMI 010862-010872
I 39	ITS Airbag for RollTek Product Integration Document	IMMI 010873-010881
I 40	Roll Sensor for RollTek Product Integration Document	IMMI 010888-10900
I 41	March 2008 CAPE Rollover Test Report for Peterbilt 379 Cab	IMMI 2300-2355
I 42	Cape CTR08493 Test Report	PKJH06772-07046
I 43	Cape Internal Test Summary	IMMI_002298-002299
I 44	RollTek Sales Data	IMMI 010901
I 45	PACCAR - Rollover Protection Technologies Final Report	PPAM 07191-07193
I 46	PACCAR Rollover Simulation	PPAM 07194-07196
I 47	PACCAR rollover development program correspondence	PPAM 08064-08081
I 48	Internal PACCAR email correspondence re: IMMI rollover project	PPAM 08878
I 49	Email from Bean to Bedwell re: Rollover Project	PPAM 08881
I 50	Emails between Bean and Bedwell re: Rollover Project	PPAM 08882

Exhibit No.	Document Description	Bates Label
I 51	Email from bean to Bedwell re: Rollover Project	PPAM 08883
I 52	Internal PACCAR emails correspondence re: T2000 vehicle rollover model	PPAM 08889
I 53	Email between Bedwell and Bean re: questions about T2000 rollover testing	PPAM 08889-08890
I 54	Email between Bedwell and Bean re: project definition for Rollover Project	PPAM 08898
I 55	Email from Bean to Bedwell re: Rollover Project and Sled Testing	PPAM 08920
I 56	IMMI RollTek marketing material with National Seat	CVG 178
I 57	IMMI RollTek marketing material with Atlas seat	CVG 9-10
I 58	IMMI RollTek for National presentation	CVG 13-24
I 59	IMMI RollTek Marketing Materials and Development Timeline	CVG 41-44
I 60	IMMI Here Comes the Boom video	
I 61	Zurich photographs of truck after accident and scene	
I 62	Truck photos taken by Clifford Hill	
I 63	Virginia State Police Photos	
I 64	Scene photos produced by Plaintiff	
I 65	Photos of Plaintiff taken by Sharon Hill	
I 66	Roanoke Memorial Hospital Medical Records	HILLSUPP 4341-9561
I 67	Radiology imagines of Plaintiff's injuries	
I 68	Wake Forest University Baptist Medical Center Records	HILLSUPP 4049-4085
I 69	Photographs taken by Ann Hunt	
I 70	Georgia Pacific Deposition by Written Questions Response	
I 71	Contract between Millis and Georgia Pacific	

Exhibit No.	Document Description	Bates Label
I 72	PACCAR cab testing video	PDJH05545
I 73	PACCAR side curtain airbag testing video	PPAM08570
I 74	PACCAR testing video	PPAM03710
I 75	Kenworth T660 Operator's Manual	PKJH00094-00532
I 76	PACCAR Operator's Manual Supplement - RollTek	PKJH 5259-5265
I 77	Kenworth Extended Day Cab SAE J2422 Cab Roof Strength Evaluation Final Report	PKJH 5284-5307
I 78	March 2010 RollTek Final Report for implementation in a Peterbilt Cab	PKJH 5903-6137
I 79	November 1997 Rollover Testing Development Final Report	PPAM 1409-1496
I 80	PACCAR Interoffice Communication re: SAE Truck Crashworthiness Research Project Meeting, April 1991	PPAM 2335-2337
I 81	PACCAR Interoffice Communication re: SAE Truck Crashworthiness Meeting Notes, February 1992	PPAM 2340-2342
I 82	May 1992 PACCAR Interoffice Communication re: SAE Truck Crashworthiness Meeting Notes, April 29, 1992	PPAM 2343-2344
I 83	July 1992 PACCAR Interoffice Communication re: SAE Truck Crashworthiness Meeting Notes, June 17, 1992	PPAM 2345-2346
I 84	October 1993 PACCAR Interoffice Communication re: SAE Crashworthiness Task Force Meeting with attachments	PPAM 2347-2369
I 85	March 1994 Kenworth Division Interoffice Communication re: SAE Heavy Truck Crashworthiness Subcommittee 3/3/94	PPAM 2384-2385
I 86	March 1994 PACCAR Memo re: SAE Truck Crashworthiness Phase II Proposal	PPAM 2406-2415

Exhibit No.	Document Description	Bates Label
I 87	March 1994 PACCAR Interoffice Communication re: SAE Truck Crashworthiness Task Force Meeting, Feb. 23-24, 1994 with attachments	PPAM 2386-2404
I 88	May 1994 PACCAR Interoffice Communication re: SAE Truck Crashworthiness Task Force Meeting, April 13-14, 1994 and Presentation by Louis Cheng to PACCAR Personnel	PPAM 2416-2447
I 89	March 24, 1992 PACCAR Interoffice Communication re: Trip Report March 11-12, 1992: SAE Crashworthiness Subcommittee and IMMI	PPAM 2452-2453
I 90	October 19, 1992 PACCAR Interoffice Communication re: SAE Truck Crashworthiness Interim Report	PPAM 2464-2469
I 91	January 16, 1995 PACCAR Interoffice Communication re: SAE Crashworthiness Research Task C Report and Task Force Meeting Minutes	PPAM 2657-2659
I 92	September 21, 1994 PACCAR Interoffice Communication re: SAE Truck Crashworthiness Task Force Meeting, September 15, 1994	PPAM 2520-2523
I 93	January 15, 1996 PACCAR Interoffice Communication re: SAE Crashworthiness Task Force Meeting Minutes	PPAM 2541-2543
I 94	January 16, 1996 PACCAR Interoffice Communication re: SAE Crashworthiness Research Task C Report and Task Force Meeting Minutes	PPAM 2657-2659
I 95	February 15, 1991 PACCAR Interoffice Communication re: SAE Crashworthiness Research Project Meeting February 12, 1991	PPAM 4285-4298

Exhibit No.	Document Description	Bates Label
I 96	March 29, 1991 PACCAR Interoffice Communication re: SAE Truck Crashworthiness Research Project Meeting March 19, 1991	PPAM 4299-4300
I 97	PG93-005 PACCAR Technical Center timeline and budget for SAE Crashworthiness Task Force	PPAM 5355-5356
I 98	PG94-005 PACCAR Technical Center timeline and budget for SAE Crashworthiness Task Force	PPAM 5357
I 99	PG94-005 PACCAR project plan for SAE Crashworthiness Task Force	PPAM 5358-5359
I 100	PG94-005 PACCAR Phase I, Task C Results	PPAM 5360-5363
I 101	PG95-005 PACCAR 1995 Project Plans	PPAM 5363
I 102	February 12, 1997 PACCAR PG96-005 Final Report	PPAM 5371-5373
I 103	PG96-005 PACCAR Rollover Occupant Protection testing report	PPAM 5374-5381
I 104	PG96-005 PACCAR Rollover Occupant Protection	PPAM 5390-5392
I 105	September 17, 1996 Letter from PACCAR re: SAE Crashworthiness Task Force Meeting, Cab Structural Test Procedures	PPAM 5425-5437
I 106	PG96-006 PACCAR project and test procedures for SAE Crashworthiness Task Force	PPAM 5548-5556
I 107	April 4, 1996 PACCAR PG95-005 Final Report	PPAM 5557-5558
I 108	August 9, 1995 PACCAR Interoffice Communication re: SAE Crashworthiness Research Task Force Meeting.	PPAM 5559-5564
I 109	January 2, 1992 PACCAR Technical Center Request for Technical Services: Vehicle Integrity/Occupant Protection	PPAM 5746-5748
I 110	March 1, 1994 PACCAR	PPAM 5749-5753

Exhibit No.	Document Description	Bates Label
	Occupant Protection Major Program Report PG93-005	
I 111	PG92-005 PACCAR Vehicle Integrity/Occupant Protection plan and budget	PPAM 5754-5755
I 112	PG92-005 PACCAR Vehicle Integrity/Occupant Protection plan and budget	PPAM 5756-5761
I 113	PG93-005 PACCAR Occupant Protection Technologies purpose and objectives	PPAM 5762-5763
I 114	February 3, 1995 PACCAR Occupant Protection Technology Program Report PG94-005	PPAM 5764-5766
I 115	January 19, 1993 PACCAR Occupant Protection/Cab Integrity Project PG92-005	PPAM 5906-5907
I 116	April 9, 2001 PACCAR Rollover Protection Technologies PG00-174-10 Final Report	PPAM 7191-7193
I 117	April 9, 2001 PACCAR and IMMI Rollover Simulation PG99-005-001 Final Report	PPAM 7194-7196
I 118	October 5, 1998 Occupant Protection Technology Rollover Protection Feasibility Study Project PG97-005-02 Final Report	PPAM 7318-7329
I 119	October 2, 1998 T2000 Rollover Baseline Simulation Testing Final Report	PPAM 7330-7342
I 120	February 20, 1997 PACCAR Project Plan/Estimate for Kenworth Rollover Simulation Tests	PPAM 7367-7368
I 121	March 27, 1997 PACCAR Request for Technical services, Kenworth T2000 Rollover Simulation Tests	PPAM 7369-7370
I 122	October 14, 1997 PACCAR Interoffice Communication re: KW96-271-52, T2000 Rollover Simulator Tests	PPAM 7380-7381
I 123	February 3, 1998 PACCAR Cab	PPAM 7545-7610

Exhibit No.	Document Description	Bates Label
	Testing, Simulated Rollover Test, 1997 Kenworth T2000	
I 124	April 24, 1997 PACCAR Project Plan/Estimate, Occupant Protection Technology – Rollover Laboratory Test Development	PPAM 8302-8303
I 125	September 18, 1997 PACCAR Cab Testing, Simulated Rollover Test, 1997 Kenworth T20000	PPAM 7722-7907
I 126	April 24, 1997 PACCAR Request for Technical Services, Rollover Laboratory Test Development	PPAM 8304
I 127	December 16-17, 1997 PACCAR Cab Testing, Simulated Rollover Tests, 1997 Kenworth T2000	PPAM 8411-8569
I 128	November 4, 1999 PACCAR Project Plan/Estimate for Rollover Simulation	PPAM 8671-8673
I 129	May 23, 1997 Recaro Integrated Seat Pull PB95-287 Final Report	PPAM 9032-9046
I 130	UMTRI Research Review: Crashworthiness of Large-Truck Cabs	PPAM 438-461
I 131	US Efforts to Improve Heavy Truck Occupant Crash Protection and Reduce Aggressivity In Frontal Truck/Car Collision	PPAM 462-476
I 132	NHTSA The Fifteenth International Technical Conference on Enhanced Safety of Vehicles	PPAM 477-509
I 133	Heavy Truck Pilot Crash Test Rollover	PPAM 510-591
I 134	US Efforts to Improve Heavy Truck Occupant Crash Protection and Reduce Aggressivity In Frontal Truck/Car Collision	PPAM 757-771
I 135	Vehicle Factors in Accidents Involving Medium and Heavy Trucks	PPAM 772-798
I 136	Occupant Survivability in Heavy-Truck Crashes	PPAM 829-868

Exhibit No.	Document Description	Bates Label
I 137	NHTSA A Study of Heavy Truck Occupant Protection: Accident Data Analyses	PPAM 869-970
I 138	NHTSA Truck Occupant Protection	PPAM 971-1090
I 139	NHTSA Heavy Truck Safety Study Prepared in Response to: Section 216: P.L. 98-554, October 30, 1984, Motor Carrier Safety Act of 1984	PPAM 1091-1314
I 140	UMTRI Heavy Truck Cab Safety Study	PPAM 1327-1380
I 141	SAE Heavy Truck Crashworthiness – Phase III	PPAM 1497-1872
I 142	NHTSA A Study of Heavy Truck Occupant Protection: Accident Data Analyses	PPAM 1873-1972
I 143	Rollover of Heavy Commercial Vehicles	PPAM 1973-2044
I 144	Kevan Granat Project Binder	
I 145	Curriculum Vitae of Kevan Granat	
I 146	Accident reconstruction	
I 147	Virginia Crash Report	
I 148	Police Crash Report Field Notes	
I 149	Franklin County EMS Report	
I 150	Police Photographs	
I 151	Police Photographs – Brightened	
I 152	Kevan Granat On -Site Photographs	
I 153	Kevan Granat Selected On Photographs – Brightened	
I 154	Kevan Granat Crash Scene Inspection Notes	
I 155	Kevan Granat Crash Scene Inspection Photographs and Drone Photographs	
I 156	Kevan Granat Crash Scene Inspection Videos	
I 157	Kevan Granat Crash Scene Inspection Laser Scan Data	
I 158	Kevan Granat Crash Vehicle Inspection Notes	
I 159	Kevan Granat Crash Vehicle	

Exhibit No.	Document Description	Bates Label
	Inspection Photographs	
I 160	Kevan Granat Crash Vehicle Inspection Laser Scan Data	
I 161	Jim Chinni Surrogate Study Photographs	
I 162	Chimba Mkandawire Surrogate Study Photographs	
I 163	2014 Kenworth T660 Tractor & Trailer Specifications	
I 164	Vehicle Specifications Sheet	
I 165	Trailer Specifications and Loading	
I 166	Subject Vehicle VIN Report by VINlink	
I 167	2014 Diesel Truck Index, Kenworth T660 Excerpts	
I 168	Subject Vehicle Build Sheet Excerpts	
I 169	Georgia Pacific Bill of Lading	
I 170	2008 Great Dane Trailer VIN Report by VINlink	
I 171	Summary of Opinions – Kevan Granat	
I 172	Reconstruction Diagrams	
I 173	Speed, Work, & Energy Analysis	
I 174	Crash Scene Street View Images	
I 175	Crash Scene Inspection Drone Mapping: Ortho -M	
I 176	Crash Scene Inspection Drone Mapping: Processing Report	
I 177	Photographic Analysis Renders	
I 178	Reconstruction Sequence Renders	
I 179	Crash Vehicle Engine Control Module Imaging Report	
I 180	Astronomical Data for Crash Date and Location	
I 181	Historical Weather Data for Crash Date and Location	
I 182	Roof Damage Exhibits	
I 183	Frames from PC Crash Animation	
I 184	Large Truck Rollover Frequency	

Exhibit No.	Document Description	Bates Label
	by Number of Quarter Turns Charts	
I 185	Technical Reference – Rollover of Heavy Commercial Vehicles	
I 186	Technical Reference – Friction Applications in Accident Reconstruction	
I 187	Technical Reference – NHTSA’s Class 8 Truck-Tractor Stability Control Test Track Effectiveness	
I 188	Technical Reference – Inertial Properties of Commercial Vehicles	
I 189	Technical Reference – Tractor-Trailer Rollover Crash Test	
I 190	Technical Reference – Timber Utility Pole Fracture Mechanics Due to Non-Deformable and Deformable Moving Barrier Impacts	
I 191	Technical Reference – Pole and Vehicle Energy Absorption in Lateral Oblique Impacts with Rigid and Frangible Poles	
I 192	Technical Reference – Wooden Pole Fracture Energy in Vehicle Impacts	
I 193	Technical Reference – Reconstruction of Rollover Collisions	
I 194	Technical Reference – Analysis of Rollover Restraint Performance with and without Seat Belt Pretensioner at Vehicle Trip	
I 195	Technical Reference – A Dynamic Test Procedure for Evaluation of Tripped Rollover Crashes	
I 196	Technical Reference – Characteristics of Soil-Tripped Rollovers	
I 197	Technical Reference – Characteristics of On-Road	

Exhibit No.	Document Description	Bates Label
	Rollovers	
I 198	Technical Reference – Testing and Analysis of Vehicle Rollover Behavior	
I 199	Technical Reference – Physical Evidence Analysis and Roll Velocity Effects in Rollover Accident Reconstruction	
I 200	Technical Reference – Modeling of Rollover Sequences	
I 201	Technical Reference – Traffic Accident Reconstruction (book)	
I 202	Technical Reference – The Traffic-Accident Investigation Manual (book)	
I 203	Technical Reference – Rollover Crash Tests on Dirt: An Examination of Rollover Dynamics	
I 204	Mockup Platform Representing Kenworth T660, including suspension seat, seatbelt kit, and tethers	
I 205	Mockup Platform Representing RollTek Installation, including Inert RollTek System in Sears Atlas 70 Seat, lap-shoulder seatbelt system, and tethers	
I 206	Replacement Seatbelt Kit, Suspension Seat S84-1070-400	
I 207	Curriculum Vitae of James Chinni	
I 208	49 CFR 571.207 Seating Systems	
I 209	49 CFR 571.209 Seat Belt Assemblies	
I 210	49 CFR 571.210 Seat Belt Assembly Anchorages	
I 211	SAE J2426 Occupant Restraint System Evaluation – Lateral Rollover System Level Heavy Trucks	
I 212	SAE 2015-01-2868 Heavy Truck Crash Analysis and Countermeasures to Improve	

Exhibit No.	Document Description	Bates Label
	Occupant Safety	
I 213	DOT HS 812 061 Heavy Truck Crashworthiness: Injury Mechanisms and Countermeasures to Improve Occupant Safety	
I 214	FMCSA RRR-07_029 Safety Belt Technology Countermeasures Study	
I 215	SAE 2007-01-4254 Tractor- Trailer Rollover Crash Test	
I 216	DOT HS 810 646 Large Truck Crash Causation Study: An Initial Overview	
I 217	SAE 2004-01-0327 Occupant Kinematics and Restraint Effectiveness During a Quarter Turn Rollover in a Heavy Truck	
I 218	FMCSA Large Truck and Bus Crash Facts 2017	
I 219	1999-01-0441 Seat Belt Survey: Identification and Assessment of Non-collision Markings	
I 220	SAE 2000-01-1317 Characteristics of Seat Belt Restraint System Markings	
I 221	SAE 2006-01-1128 Forensic Determination of Seat Belt Usage in Automotive Collisions	
I 222	FMCSA Commercial Motor Vehicle Safety Belt Facts 2017	
I 223	Study: Half of all European Truck Drivers Don't Wear Their Seatbelts	
I 224	Photographs from J. Chinni Inspection of Subject Truck on January 18, 2019	
I 225	Illustration of Seatbelt Components	
I 226	Illustration of Heavy Truck Seat and Seatbelt Anchorages	
I 227	Illustration of FMVSS 207 Forward Force Application	
I 228	Illustration of FMVSS 207 and	

Exhibit No.	Document Description	Bates Label
	210 Forward Force Application	
I 229	Illustration of FMVSS 207 and 210 Forward Force Requirements	
I 230	Illustration of FMVSS 207 and 210 Force Applied to ABTS Suspension Seat	
I 231	Jim Chinni Diagram and Photographs from Surrogate Studies	
I 232	Seatbelt Installed in Truck	PKJH 00017
I 233	Seatbelt Installation Guide Provided with Truck	PKJH 00032
I 234	Seatbelt Effectiveness	PKJH 00109
I 235	Seatbelt Instructions	PKJH 00110-111
I 236	Kenworth T660 Brochure	PKJH 000698-733
I 237	F106509 Drawing	IMMI 1-2
I 238	Peterbilt RollTek Drawing	IMMI 78
I 239	RollTek Availability	IMMI 89-91
I 240	RollTek Brochure	IMMI 120
I 241	RollTek, Peterbilt	IMMI 104
I 242	Histograms of Product Testing	IMMI 290-298
I 243	SGS Test Reports	IMMI 290-298
I 244	Police Report	
I 245	Tractor-Trailer Rollover Test	IMMI 384
I 246	SPACE	IMMI 462-463
I 247	IMMI RollTek Promotional Materials	
I 248	CTR 084393 Kenworth Roll Testing October 2013	
I 249	Photographs of ABTS Suspension Seat	
I 250	Photographs of Automotive Retractor Pretensioner	
I 251	Photographs of Automotive Side Curtain Airbag	
I 252	Photographs of In-Service Kenworth Trucks	
I 253	Diagram Comparing J. Chinni Inspection and Surrogate Study	
I 254	Summary of Millis Transport Rollover Crashes	
I 255	Timeline – Hill claim	
I 256	Jim Chinni EA Opinion	

Exhibit No.	Document Description	Bates Label
	Summary	
I 257	Jim Chinni EA Opinion Support	
I 258	RollTek Tractor-Trailer Test Videos	IMMI 379
I 259	Curriculum Vitae of Chimba Mkandawire	
I 260	Injury Diagram: Cervical Spine	
I 261	Injury Diagram: Outer Body	
I 262	Skull model depicting different regions	
I 263	Cervical spine model	
I 264	Illustration of cervical spine compression	
I 265	Models of subject vehicle showing interaction opportunities for Hill	
I 266	3D reconstruction of Hill's C-Spine and 3D print of C-spine	
I 267	AIS scoring for Hill's injuries	
I 268	C. Mkandawire Inspection Photographs	
I 269	C. Mkandawire Photographs of surrogate study's height and weight compared to Hill's height and weight	
I 270	Photographs of exemplar Kenworth cab	
I 271	J. Chinni Photographs from surrogate studies	
I 272	IMMI Testing CTR02713-001 and CTR02713-002	
I 273	Inspection photographs showing seat height differential	
I 274	Photograph of Hill's left frontal head laceration	
I 275	Models showing bending of cervical spine	
I 276	Outline of injuries typically associated with lateral bending	
I 277	AIS scoring for Hill's AIS 2 injuries	
I 278	Post-accident photographs of truck	
I 279	Photographs of Hill's treatment	HILL 2322-2323

Exhibit No.	Document Description	Bates Label
I 280	Exhibit 3 to Deposition of Jonathan Eisenstat – Photographs of Hill’s head	
I 281	Seat Integrated and Conventional Restraints: A Study of Crash Injury/Fatality Rates in Rollovers, Padmanaban and Burnett (2008)	
I 282	Modeling the Effects of Seat Belt Pretensioners on Occupant Kinematics During Rollover, Newberry, <i>et al.</i> (2006)	
I 283	Analysis of Rollover Restraint Performance with and without Seat Belt Pretensioners at Vehicle Trip, Hare, <i>et al.</i> (2002)	
I 284	Franklin County Public Safety Pre-Hospital Care Report (Exhibit 2 to Deposition of Lynn Wray)	
I 285	NHTSA A Study of Heavy Truck Occupant Protection: Accident Data Analyses	PPAM02045-02144
I 286	NHTSA Heavy Truck Occupant Protection	PPAM02145-02331
I 287	FAA 1/31/94 Progress Report on the Heavy Truck Crashworthiness Research	PPAM02370-02376
I 288	FAA 12/15/93 Progress Report on the Heavy Truck Crashworthiness Research	PPAM02377-02383
I 289	Email dated 12/11/92 re SAE Crashworthiness Funding	PPAM02492-002493
I 290	Email dated 11/30/93 re SAE Crashworthiness Task Force	PPAM02494-02503
I 291	UMTRI Heavy Truck Cab Safety Study	PPAM04301-04350
I 292	FAA Heavy Truck Crashworthiness (Phase I, Task A1-2)	PPAM04353-04408
I 293	SAE Heavy Truck Crashworthiness (Phase I, Task C)	PPAM04409-04622
I 294	SAE Heavy Truck	PPAM04623-04810

Exhibit No.	Document Description	Bates Label
	Crashworthiness (Phase I, Task B)	
I 295	SAE Heavy Truck Crashworthiness (Phase II)	PPAM04811-05124
I 296	Heavy Truck Rollovers: A Safety Issue	PPAM05125-05328
I 297	Heavy Truck Safety	PPAM05351-05352
I 298	Seating System Technologies Project PG01-174-09 Final Report	PPAM06423-06425
I 299	Paccar Corporate Standard	PPAM06827-06830
I 300	Correspondence to Larry Bean dated 4/22/98 regarding seat pretensioner mechanism	PPAM07951-08063
I 301	Exponent Simulated Rollover Tests – 1997 Kenworth T2000 5/12/98-5/13/98	PPAM08306-08410
I 302	Correspondence to Larry Bean dated 5/6/02 re National Test Reports on New Seat Back Frame	PPAM08607-08619
I 303	Letter from Larry Bean to IMMI dated 1/26/00 enclosing video from vehicle rollover testing	PPAM08662
I 304	Kenworth T2000 Vehicle Rollover Dynamics Analysis	PPAM08698-08767
I 305	Email dated 11/9/99 regarding sales order	PPAM08863-08870
I 306	Email dated 11/3/99 regarding IMMI/PTC Rollover Simulation Project	PPAM08912-08913
I 307	Email dated 2/1/00 regarding Rollover Analysis Effort	PPAM08937
I 308	Rollover Simulation Project	PPAM08938-08940
I 309	Email dated 9/28/99 regarding T2000 Vehicle Rollover Model	PPAM08968
I 310	Email dated 3/27/00 regarding IMMI Technology Presentation	PPAM08969
I 311	Email dated 11/1/99 regarding IMMI Rollover Simulation Project	PPAM08970
I 312	Unibilt Cab Seat and Belt Assembly Pull Tests	PPAM11408-11442
I 313	Peterbilt National 2000 Seats	PPAM12195-12209

Exhibit No.	Document Description	Bates Label
	Project PB00-102 Final Report	
I 314	379 and 387 Seat Pull Project PB05-261 Final Report	PPAM12210-12238
I 315	Heavy Truck Crashworthiness Statistical Analysis by Failure Analysis Associates	PKJH01365-01420
I 316	Heavy Truck Crashworthiness Occupant Dynamics Simulation by Failure Analysis Associates	PKJH01421-01634
I 317	Heavy Truck Crashworthiness Accident Reconstruction by Failure Analysis Associates	PKJH01635-01822
I 318	Heavy Vehicle Rollovers: A Safety Issue	PKJH02137-02340
I 319	Kenworth Extended Day Cab SAE J2422 Cab Roof Strength Evaluation Project TC08-500- 378 Revision A Final Report	PKJH05284-05307
I 320	Chassis Final Bill	PKJH05308-05316
I 321	Project KW06-120 Final Report	PKJH05331-05342
I 322	Project KW96-145 Final Report	PKJH05343-05356
I 323	Paccar Corporate Standard	PKJH05357-05364
I 324	Engineering Change Notice	PKJH05365-05385
I 325	Engineering Change Notice	PKJH05386-05412
I 326	Engineering Change Notice	PKJH05413-05452
I 327	Engineering Change Notice	PKJH05571-05707
I 328	Engineering Change Notice	PKJH05708-05880
I 329	Engineering Change Notice	PKJH05881-05889
I 330	Engineering Change Notice	PKJH05890-05898
I 331	Peterbilt Truck Sales Bulletin: Rolltek Driver Seat Now Available on Models 579 and 567	PKJH05900-05901
I 332	RollTek Rollover Protection System Project PB08-500-383 Final Report	PKJH05903-06137
I 333	RollTek Rollover Protection System – Electrical Testing and Validation Project PB09-500-155 Final Report	PKJH06165-06171
I 334	RollTek AB10 Controller Testing and Validation Project PB11- 500-096 Final Report	PKJH06172-06184
I 335	RollTek Seat Pull Project	PKJH06185-06225

Exhibit No.	Document Description	Bates Label
	KW/PB13-156-095 Final Report	
I 336	PFMEA Review for RollTek Seats 7/23/14	PKJH06252
I 337	Memo dated 5/2/19 re Recommendation for Implementation of ECNs 2140150 and 2140698	PKJH06253-06254
I 338	Powerpoint: LifeGuard Rolltek 11/28/07	PKJH06322-06345
I 339	Paccar drawing of LifeGuard RollTek	PKJH06369-06371
I 340	Cape 8/22/12 Quotation to Kenworth	PKJH06422-06426
I 341	Kenworth RollTek Implementation timeline	PKJH06427
I 342	Kenworth RollTek Implementation timeline	PKJH06429
I 343	Paccar drawing of Harness – Main Cab	PKJH07154
I 344	Paccar Purchase Requisition	PKJH07510
I 345	Paccar Purchase Order	PKJH07511
I 346	Cape 8/22/12 Quotation	PKJH07565-07569
I 347	Product Specification	PKJH07617-07658
I 348	Letter dated 5/28/14 from Paccar to NHTSA re recall	PKJH07809-07810
I 349	Federal Recall Information	PKJH07811-07812
I 350	Letter dated 7/10/14 from Paccar to NHTSA re recall	PKJH07813-07814
I 351	Letter dated 7/11/14 from NHTSA to Paccar	PKJH07815-07816
I 352	Safety Recall 514-F – RollTek Seat	PKJH07817
I 353	U.S. Patent 6,481,777 B2	PKJH08704-08723
I 354	IMMI's Paccar Presentation dated 6/6/01	PKJH08724-08737
I 355	Volvo Safety Milestones	PKJH08738-08739
I 356	Large Truck Crash Facts 2005	PKJH08740-08800
I 357	Vehicle Factors in Accidents Involving Medium and Heavy Trucks	PKJH08801-08814
I 358	Letter dated 3/4/94 from Paccar to IMMI	PKJH08829-08833
I 359	IMMI Interoffice Memorandum	PKJH08834-08835

Exhibit No.	Document Description	Bates Label
	dated 3/24/94	
I 360	Letter dated 6/20/95 from Paccar to IMMI	PKJH08842
I 361	Memo dated 5/11/07 regarding Kenworth/Paccar Sales Calls	IMMI 000079-000084
I 362	Memo dated 7/27/07 regarding Paccar Sales Calls	IMMI 000085-000088
I 363	LifeGuard Technologies RollTek Proposal to Peterbilt Motors 4/20/07 including photos of seat systems	IMMI 000092-000094
I 364	LifeGuard Technologies Statement of Work (updated 4/16/09)	IMMI 000095-000098
I 365	Screenshot from webpage for IMMI and the invention of RollTek	IMMI 000099-000101
I 366	IMMI brochure/info on RollTek Side Roll Protection	IMMI 000102-000105
I 367	IMMI Case Study/RollTek Deployment Case Study – Sparks, NV, 10/1/09	IMMI 000106
I 368	Cape CTR08493 Test Report	IMMI 001938-002212
I 369	Color photos of Cab on Roll Machine	IMMI 002213
I 370	SAE Tractor-Trailer Rollover Crash Test Report	IMMI 002291-002297
I 371	Engineering Change Notice (ECN) Nov. 15, 2007	CVG_000001
I 372	Design of Subject-Seat	CVG_000002-000013; 000213-000218
I 373	CVG Long-Term Supply Agreement with PACCAR	CVG_000014-000177
I 374	National 2000 Series Brochure	CVG_000179-000180
I 375	NS2K Replacement Parts Manual 120909	CVG 000181-000193
I 376	National 2000 Series Brochure No. 2	CVG_000194-000199
I 377	Test Reports	CVG_000200-000208
I 378	PACCAR NDA Supplement 04 Jan 2006	CVG 000209
I 379	PACCAR Seat Sequencing Status May 29, 2007	CVG000210-000212
I 380	Seat drawings	CVG 000213-000218

Exhibit No.	Document Description	Bates Label
I 381	Part Submission Warrant	CVG 000219
I 382	Part Submission Warrant	CVG 000220
I 383	Part Submission Warrant	CVG 000221
I 384	Part Submission Warrant	CVG 000222-000234
I 385	Part Submission Warrant	CVG 000235-000239
I 386	Part Submission Warrant	CVG 000240
I 387	Part Submission Warrant	CVG 000241-000302
I 388	Part Submission Warrant	CVG 000303-000305
I 389	Part Submission Warrant	CVG 000306-000381
I 390	U.S. Patents	CVG/NS/3_000001-000035
I 391	Communications Between IMMI and CVG National Re: RollTek	CVG/NS/2_000012-24; 000041
I 392	Any document produced during the litigation by any party or non-party	
I 393	Any exhibit marked at any deposition	
I 394	Any admissible pleading of the parties or former parties	
I 395	Plaintiff's Discovery Responses	
I 396	Paccar's Discovery Responses	
I 397	IMMI's Discovery Responses	
I 398	CVG's Discovery Responses	
I 399	CVG National Seating Company's Discovery Responses	
I 400	Any discovery response by any former party	
I 401	Any demonstrative exhibits necessary to illustrate/support the opinions of any witness or expert witness	
I 402	Any document used for impeachment, rebuttal or to refresh the recollection of any witness	
I 403	Any document or other item referenced by any other party in its portion of the Pre-Trial Order/Exhibit List	

EXHIBIT C

EXHIBIT C

COMMERCIAL VEHICLE GROUP, INC. AND CVG NATIONAL SEATING COMPANY, LLC'S TRIAL EXHIBIT LIST

EXHIBIT NO.	DESCRIPTION
C1	UMTRI Research Review: Crashworthiness of Large-Truck Cabs [PPAM00438-00461]
C2	US Efforts to Improve Heavy Truck Occupant Crash Protection and Reduce Aggressivity In Frontal Truck/Car Collision [PPAM00462-00476]
C3	NHTSA The Fifteenth International Technical Conference on Enhanced Safety of Vehicles [PPAM00477-00509]
C4	Heavy Truck Pilot Crash Test Rollover [PPAM00510-00591]
C5	US Efforts to Improve Heavy Truck Occupant Crash Protection and Reduce Aggressivity In Frontal Truck/Car Collision [PPAM00757-00771]
C6	Vehicle Factors in Accidents Involving Medium and Heavy Trucks [PPAM00772-00798]
C7	Occupant Survivability in Heavy-Truck Crashes [PPAM00829-00868]
C8	NHTSA A Study of Heavy Truck Occupant Protection: Accident Data Analyses [PPAM00869-00970]
C9	NHTSA Truck Occupant Protection [PPAM00971-01090]
C10	NHTSA Heavy Truck Safety Study Prepared in Response to: Section 216: P.L. 98-554, October 30, 1984, Motor Carrier Safety Act of 1984 [PPAM01091-01314]
C11	UMTRI Heavy Truck Cab Safety Study [PPAM01327-01380]
C12	Rollover Testing Development Project PG96-005-01 Final Report [PPAM01409-01496]
C13	SAE Heavy Truck Crashworthiness – Phase III [PPAM01497-01872]
C14	NHTSA A Study of Heavy Truck Occupant Protection: Accident Data Analyses [PPAM01873-01972]
C15	Rollover of Heavy Commercial Vehicles [PPAM01973-02044]

EXHIBIT NO.	DESCRIPTION
C16	NHTSA A Study of Heavy Truck Occupant Protection: Accident Data Analyses [PPAM02045-02144]
C17	NHTSA Heavy Truck Occupant Protection [PPAM02145-02331]
C18	Interoffice Communication from Larry Bean to Bob Osnes dated 4/22/91 and Statement of Work [PPAM02335-02337]
C19	Interoffice Communication from Larry Bean to Jim Bechtold, et al. dated 2/27/92 [PPAM02340-02342]
C20	Interoffice Communication from Larry Bean to Ken Brownstein dated 5/15/92 [PPAM02343-02344]
C21	Interoffice Communication from Larry Bean to Ken Brownstein, et al. dated 7/2/92 [PPAM02345-02346]
C22	Interoffice Communication from Larry Bean to David Allen, et al. dated 10/22/93 and related documents [PPAM02347-02369]
C23	FAA 1/31/94 Progress Report on the Heavy Truck Crashworthiness Research [PPAM02370-02376]
C24	FAA 12/15/93 Progress Report on the Heavy Truck Crashworthiness Research PPAM02377-02383
C25	Interoffice Communication from Rich Bergstrand to Mark Albertson, et al. dated 3/7/94 [PPAM02384-02385]
C26	Interoffice Communication from Larry Bean to Mark Albertson, et al. dated 3/14/94 and related handwritten notes [PPAM02386-02404]
C27	Interoffice Communication from Larry Bean to Mark Albertson, et al. dated 3/29/94 and SAE Heavy Truck Crashworthiness Phase III Proposal [PPAM02406-02415]
C28	Interoffice Communication from Larry Bean to Mark Albertson, et al. dated 5/2/94 and related documents [PPAM02416-02447]
C29	Interoffice Communication from Larry Bean to Margaret Sullivan dated 3/24/92 [PPAM02452-02453]
C30	Interoffice Communication from Larry Bean to Jim Bechtold, et al. dated 10/19/92 [PPAM02464-02469]

EXHIBIT NO.	DESCRIPTION
C31	Email dated 12/11/92 re SAE Crashworthiness Funding [PPAM02492-002493]
C32	Email dated 11/30/93 re SAE Crashworthiness Task Force [PPAM02494-02503]
C33	Interoffice Communication from Larry Bean to Jim Bechtold, et al. dated 9/21/94 [PPAM02520-02523]
C34	Interoffice Communication from Larry Bean to Jim Bechtold, et al. dated 1/15/96 [PPAM02541-02543]
C35	Interoffice Communication from Larry Bean to Jim Bechtold, et al. dated 1/16/95 [PPAM02657-02659]
C36	Interoffice Communication from Larry Bean to Bob Osnes dated 2/15/91 and Report on the Progress of the UMTRI Cab Safety Study dated 2/11/91 [PPAM04285-04298]
C37	Interoffice Communication from Larry Bean to Bob Osnes dated 3/29/91 [PPAM04299-04300]
C38	UMTRI Heavy Truck Cab Safety Study [PPAM04301-04350]
C39	FAA Heavy Truck Crashworthiness (Phase I, Task A1-2) [PPAM04353-04408]
C40	SAE Heavy Truck Crashworthiness (Phase I, Task C) [PPAM04409-04622]
C41	SAE Heavy Truck Crashworthiness (Phase I, Task B) [PPAM04623-04810]
C42	SAE Heavy Truck Crashworthiness (Phase II) [PPAM04811-05124]
C43	Heavy Truck Rollovers: A Safety Issue [PPAM05125-05328]
C44	Heavy Truck Safety [PPAM05351-05352]
C45	PG93-005 Paccar Technical Center Occupant Protection Technologies [PPAM05355-05356]
C46	PG94-005 Paccar Technical Center Occupant Protection Technologies [PPAM05357]
C47	Occupant Protection Technologies PG94-005 [PPAM05358-05359]

EXHIBIT NO.	DESCRIPTION
C48	Occupant Protection Technologies PG94-005 [PPAM05360-05362]
C49	Occupant Protection Technologies PG95-005 [PPAM05363]
C50	Occupant Protection Technology Program Project PG96-005 Final Report [PPAM05371-05373]
C51	PG96-005 Occupant Protection Major Program Rollover Occupant Protection [PPAM05374-05381]
C52	PG96-005 Occupant Protection Major Program Rollover Occupant Protection [PPAM05390-05392]
C53	Interoffice Communication from Larry Bean to Paul Middelhoven, et al. dated 9/17/96 and SAE Recommended Practices-Cab Structural Tests [PPAM05425-05437]
C54	PG96-005 Occupant Protection Major Program SAE Crashworthiness Task Force [PPAM05548-05556]
C55	Occupant Protection Technology Program Project PG95-005 Final Report [PPAM05557-05558]
C56	Interoffice Communication from Larry Bean to Jim Bechtold, et al. dated 8/9/95 [PPAM05559-05564]
C57	Request for Technical Services dated 1/6/92 [PPAM05746-05748]
C58	Occupant Protection Major Program, Report Number PG93-005 [PPAM05749-05753]
C59	PTC Major Program: PG92-005, Vehicle Integrity/Occupant Protection [PPAM05754-05755]
C60	PTC Major Program: PG92-005, Vehicle Integrity/Occupant Protection [PPAM05756-05761]
C61	PG93-005 Paccar Technical Center Occupant Protection Technologies [PPAM05762-05763]
C62	Occupant Protection Technology Program Report Number PG94-005 and related documents [PPAM05764-05766]
C63	Occupant Protection/Cab Integrity PTC Project PG92-005 and Authorization for Distribution of Confidential Information [PPAM05906-005907]

EXHIBIT NO.	DESCRIPTION
C64	Seating System Technologies Project PG01-174-09 Final Report [PPAM06423-06425]
C65	Paccar Corporate Standard [PPAM06827-06830]
C66	Rollover Protection Technologies Project PG00-174-10 Final Report [PPAM07191-07193]
C67	Rollover Simulation Project PG99-005-01 Final Report [PPAM07194-07196]
C68	Occupant Protection Technology – Rollover Protection Feasibility Study Project PG97-005-02 Final Report [PPAM07318-07329]
C69	T2000 Rollover Baseline Simulator Testing Project KW96-271-52 Final Report [PPAM07330-07342]
C70	Paccar Project Plan/Estimate KW96-271-52 [PPAM07367-07368]
C71	Paccar Request for Technical Services KW96-271-52 [PPAM07369-07370]
C72	Interoffice Communication from Larry Bean to Jim Bechtold, et al. dated 10/14/97 [PPAM07380-07381]
C73	Paccar Cab Testing PH05315 AAF4 1997 Kenworth T2000 Simulated Rollover Test 5/12-13/98 [PPAM07545-07610]
C74	Paccar Cab Testing PH05315 AA 1997 Kenworth T2000 Simulated Rollover, 9/18/97 [PPAM07722-07907]
C75	Correspondence to Larry Bean dated 4/22/98 regarding seat pretensioner mechanism [PPAM07951-08063]
C76	Correspondence to Larry Bean dated 4/15/97 regarding a rollover development program [PPAM08064-08081]
C77	Paccar Project Plan/Estimate PG97-005-02 [PPAM08302-08303]
C78	Paccar Request for Technical Services PG97-005-02 [PPAM08304]
C79	Exponent Simulated Rollover Tests – 1997 Kenworth T2000 5/12/98-5/13/98 [PPAM08306-08410]
C80	Paccar Cab Testing PH05315 AAF2 1997 Kenworth T2000 Simulated Rollover Tests, 12/16-17/97 [PPAM08411-08569]

EXHIBIT NO.	DESCRIPTION
C81	Correspondence to Larry Bean dated 5/6/02 re National Test Reports on New Seat Back Frame [PPAM08607-08619]
C82	Letter from Larry Bean to IMMI dated 1/26/00 enclosing video from vehicle rollover testing [PPAM08662]
C83	Paccar Project Plan/Estimate 11/4/99 [PPAM08671-08673]
C84	Kenworth T2000 Vehicle Rollover Dynamics Analysis [PPAM08698-08767]
C85	Email dated 11/9/99 regarding sales order [PPAM08863-08870]
C86	Email dated 11/3/99 regarding IMMI/PTC Rollover Simulation Project [PPAM08912-08913]
C87	Email dated 2/1/00 regarding Rollover Analysis Effort [PPAM08937]
C88	Rollover Simulation Project [PPAM08938-08940]
C89	Email dated 9/28/99 regarding T2000 Vehicle Rollover Model [PPAM08968]
C90	Email dated 3/27/00 regarding IMMI Technology Presentation [PPAM08969]
C91	Email dated 11/1/99 regarding IMMI Rollover Simulation Project [PPAM08970]
C92	Recaro Integrated Seat Pull Project PB95-287 Final Report [PPAM09032-09046]
C93	Unibilt Cab Seat and Belt Assembly Pull Tests [PPAM11408-11442]
C94	Peterbilt National 2000 Seats Project PB00-102 Final Report [PPAM12195-12209]
C95	379 and 387 Seat Pull Project PB05-261 Final Report [PPAM12210-12238]
C96	Veh. Manuf. Info. Chassis 391764, Build Date 3/5/13 [PKJH00001-00093]
C97	Kenworth Operator's Manual [PKJH00094-00532]
C98	Kenworth T660 Brochure [PKJH00698-00733]
C99	Heavy Truck Crashworthiness Statistical Analysis by Failure Analysis Associates [PKJH01365-01420]

EXHIBIT NO.	DESCRIPTION
C100	Heavy Truck Crashworthiness Occupant Dynamics Simulation by Failure Analysis Associates [PKJH01421-01634]
C101	Heavy Truck Crashworthiness Accident Reconstruction by Failure Analysis Associates [PKJH01635-01822]
C102	Heavy Vehicle Rollovers: A Safety Issue [PKJH02137-02340]
C103	Long Term Supply Agreement between Paccar and IMMI [PKJH05149-05164]
C104	Paccar Corporate Standard [PKJH05149-05156]
C105	Kenworth Rolltek Protection System in Atlas 2 Seat Available – TE1998 [PKJH05257-05258]
C106	Paccar Operator’s Manual Supplement [PKJH05259-05265]
C107	KenworthT660 Data Book (1/1/12 Price Period) [PKJH05266-05283]
C108	Kenworth Extended Day Cab SAE J2422 Cab Roof Strength Evaluation Project TC08-500-378 Revision A Final Report [PKJH05284-05307]
C109	Chassis Final Bill [PKJH05308-05316]
C110	Project KW06-120 Final Report [PKJH05331-05342]
C111	Project KW96-145 Final Report [PKJH05343-05356]
C112	Paccar Corporate Standard [PKJH05357-05364]
C113	Engineering Change Notice [PKJH05365-05385]
C114	Engineering Change Notice [PKJH05386-05412]
C115	Engineering Change Notice [PKJH05413-05452]
C116	Engineering Change Notice [PKJH05571-05707]
C117	Engineering Change Notice [PKJH05708-05880]
C118	Engineering Change Notice [PKJH05881-05889]
C119	Engineering Change Notice [PKJH05890-05898]

EXHIBIT NO.	DESCRIPTION
C120	Peterbilt Truck Sales Bulletin: Rolltek Driver Seat Now Available on Models 579 and 567 [PKJH05900-05901]
C121	Listing of Peterbilt and Kenworth Trucks Ordered with Rolltek Seats [PKJH05902]
C122	RollTek Rollover Protection System Project PB08-500-383 Final Report [PKJH05903-06137]
C123	RollTek Rollover Protection System – Electrical Testing and Validation Project PB09-500-155 Final Report [PKJH06165-06171]
C124	RollTek AB10 Controller Testing and Validation Project PB11-500-096 Final Report [PKJH06172-06184]
C125	RollTek Seat Pull Project KW/PB13-156-095 Final Report [PKJH06185-06225]
C126	Paccar seat drawing [PKJH06226-06229]
C127	Paccar seat drawing [PKJH06230-06235]
C128	Paccar seat drawing [PKJH06236-06238]
C129	PFMEA Review for RollTek Seats 7/23/14 [PKJH06252]
C130	Memo dated 5/2/19 re Recommendation for Implementation of ECNs 2140150 and 2140698 [PKJH06253-06254]
C131	Powerpoint: LifeGuard Rolltek 11/28/07 [PKJH06322-06345]
C132	Paccar drawing of LifeGuard RollTek [PKJH06369-06371]
C133	Paccar drawing of seat [PKJH06372-06377]
C134	Cape 8/22/12 Quotation to Kenworth [PKJH06422-06426]
C135	Kenworth RollTek Implementation timeline [PKJH06427]
C136	Kenworth RollTek Implementation timeline [PKJH06429]
C137	Cape CTR08493 Test Report [PKJH06772-07046]
C138	Paccar drawing of Harness – Main Cab [PKJH07154]

EXHIBIT NO.	DESCRIPTION
C139	Paccar Purchase Requisition [PKJH07510]
C140	Paccar Purchase Order [PKJH07511]
C141	Cape 8/22/12 Quotation [PKJH07565-07569]
C142	Product Specification [PKJH07617-07658]
C143	Letter dated 5/28/14 from Paccar to NHTSA re recall [PKJH07809-07810]
C144	Federal Recall Information [PKJH07811-07812]
C145	Letter dated 7/10/14 from Paccar to NHTSA re recall [PKJH07813-07814]
C146	Letter dated 7/11/14 from NHTSA to Paccar [PKJH07815-07816]
C147	Safety Recall 514-F – RollTek Seat [PKJH07817]
C148	U.S. Patent 6,481,777 B2 [PKJH08704-08723]
C149	IMMI's Paccar Presentation dated 6/6/01 [PKJH08724-08737]
C150	Volvo Safety Milestones [PKJH08738-08739]
C151	Large Truck Crash Facts 2005 [PKJH08740-08800]
C152	Vehicle Factors in Accidents Involving Medium and Heavy Trucks [PKJH08801-08814]
C153	Letter dated 3/4/94 from Paccar to IMMI [PKJH08829-08833]
C154	IMMI Interoffice Memorandum dated 3/24/94 [PKJH08834-08835]
C155	Letter dated 6/20/95 from Paccar to IMMI [PKJH08842]
C156	VIDEO: Confidential & Proprietary Subject to Protective Order [PPAM03710]
C157	VIDEO: Confidential & Proprietary Subject to Protective Order [PKJH05545]
C158	VIDEO: Confidential & Proprietary Subject to Protective Order [PPAM08570]
C159	RollTek seat drawing/diagram [IMMI_000078]

EXHIBIT NO.	DESCRIPTION
C160	Memo dated 5/11/07 regarding Kenworth/Paccar Sales Calls [IMMI 000079-000084]
C161	Memo dated 7/27/07 regarding Paccar Sales Calls [IMMI 000085-000088]
C162	RollTek brochure/info on seat pretensioners [IMMI 000089-000091]
C163	LifeGuard Technologies RollTek Proposal to Peterbilt Motors 4/20/07 including photos of seat systems [IMMI 000092-000094]
C164	LifeGuard Technologies Statement of Work (updated 4/16/09) [IMMI 000095-000098]
C165	Screenshot from webpage for IMMI and the invention of RollTek [IMMI 000099-000101]
C166	IMMI brochure/info on RollTek Side Roll Protection [IMMI 000102-000105]
C167	IMMI Case Study/RollTek Deployment Case Study – Sparks, NV, 10/1/09 [IMMI 000106]
C168	Cape CTR08493 Test Report [IMMI 001938-002212]
C169	Color photos of Cab on Roll Machine [IMMI 002213]
C170	SAE Tractor-Trailer Rollover Crash Test Report [IMMI 002291-002297]
C171	Cape Internal Test Summary [IMMI_002298-002299]
C172	Cape Test Report [IMMI_002300-002355]
C173	Engineering Change Notice (ECN) Nov. 15, 2007 [CVG_000001]
C174	Design of Subject-Seat [CVG_000002-000013; 000213-000218]
C175	CVG Long-Term Supply Agreement with PACCAR [CVG_000014-000177]
C176	National HP for RollTek Page 2 [CVG 000178]
C177	National 2000 Series Brochure [CVG_000179-000180]
C178	NS2K Replacement Parts Manual 120909 [CVG 000181-000193]
C179	National 2000 Series Brochure No. 2 [CVG_000194-000199]

EXHIBIT NO.	DESCRIPTION
C180	Test Reports [CVG_000200-000208]
C181	PACCAR NDA Supplement 04 Jan 2006 [CVG 000209]
C182	PACCAR Seat Sequencing Status May 29, 2007 [CVG000210-000212]
C183	Part Submission Warrant [CVG 000219]
C184	Part Submission Warrant [CVG 000220]
C185	Part Submission Warrant [CVG 000221]
C186	Part Submission Warrant [CVG 000222-000234]
C187	Part Submission Warrant [CVG 000235-000239]
C188	Part Submission Warrant [CVG 000240]
C189	Part Submission Warrant [CVG 000241-000302]
C190	Part Submission Warrant [CVG 000303-000305]
C191	Part Submission Warrant [CVG 000306-000381]
C192	Communications Between IMMI and CVG National Re: RollTek [CVG/NS/2_000012-24; 000041]
C193	U.S. Patents [CVG/NS/3_000001-000035]
C194	Kent's CV
C195	Kent's Analysis Notes
C196	Kent's Diagrams of Vehicle and Scene
C197	Kent's Field Notes
C198	Kent's Model of vehicle and scene
C199	Kent's Photos of Model of vehicle and scene
C200	Kent's Reference Materials: NHTSA Tractor Semi-Trailer Stability Objective Performance Test Research – Roll Stability
C201	Kent's Reference Materials: Northwestern University Traffic Crash

EXHIBIT NO.	DESCRIPTION
	Reconstruction
C202	Kent's Reference Materials: UMTRI Rollover of Heavy Commercial Vehicles
C203	Kent's Reference Materials: Full-Scale Rollover Testing of Commercial Cargo-Tank Vehicles
C204	Kent's Reference Materials: Wide-Base Tires Gaining Popularity: Are You Ready to Make the Switch?
C205	Kent's 5/8/19 Cab Inspection Photos
C206	Kent's 5/8/19 Chassis Inspection Photos
C207	Kent's 5/3/19 Scene Inspection Photos
C208	Kent's 5/2/19 Trailer Inspection Photos
C209	Kent's File Materials
C210	Any demonstrative exhibits necessary to illustrate/support Kent's opinions
C211	Kress' CV
C212	Kress' Affidavit dated 11/5/19
C213	Kress' Summary of Opinions
C214	Kress' Photos from Exemplar Truck Inspection 7/24/19
C215	Kress' Photos from Subject Truck Inspection 11/9/18
C216	Kress' Notes from Exemplar Truck Inspection 7/24/19
C217	Kress' Notes from Subject Truck Inspection 11/9/18
C218	Kress' Tracking Sheet
C219	Kress' File Materials
C220	Any demonstrative exhibits necessary to illustrate/support Kress' opinions
C221	Lange's CV
C222	Lange's Project Notes Powerpoint

EXHIBIT NO.	DESCRIPTION
C223	Lange's Research File
C224	Any demonstrative exhibits necessary to illustrate/support Lange's opinions
C225	Chimba Mkandawire Surrogate Study Photographs
C226	Curriculum Vitae of Chimba Mkandawire
C227	C. Mkandawire Inspection Photographs
C228	C. Mkandawire Photographs of surrogate study's height and weight compared to Hill's height and weight
C229	Kevan Granat Project Binder
C230	Curriculum Vitae of Kevan Granat
C231	Kevan Granat On-Site Photographs
C232	Kevan Granat Selected On-Site Photographs – Brightened
C233	Kevan Granat Crash Scene Inspection Notes
C234	Kevan Granat Crash Scene Inspection Photographs and Drone Photographs
C235	Kevan Granat Crash Scene Inspection Videos
C236	Kevan Granat Crash Scene Inspection Laser Scan Data
C237	Kevan Granat Crash Vehicle Inspection Notes
C238	Kevan Granat Crash Vehicle Inspection Photographs
C239	Kevan Granat Crash Vehicle Inspection Laser Scan Data
C240	Summary of Opinions – Kevan Granat
C241	Jim Chinni Surrogate Study Photographs
C242	Curriculum Vitae of James Chinni
C243	Photographs from J. Chinni Inspection of Subject Truck on January 18, 2019
C244	Jim Chinni Diagram and Photographs from Surrogate Studies

EXHIBIT NO.	DESCRIPTION
C245	Diagram Comparing J. Chinni Inspection and Surrogate Study
C246	Jim Chinni EA Opinion Summary
C247	Jim Chinni EA Opinion Support
C248	J. Chinni Photographs from surrogate studies
C249	Steve Meyer's Invoices
C250	Paul Lewis' Invoices
C251	Mike Sutton's Invoices
C252	Jonathan Eisenstat's Invoices
C253	Virginia Police Report (typed) [GP000099-000103]
C254	Virginia Police Report (handwritten) [HILL 001871-001875]
C255	4 photos from Virginia Police
C256	Foxfire Towing Report [MT 00007-00011]
C257	Burnt Chimney Fire Department Incident Report [GP 000732-000735]
C258	Burnt Chimney Volunteer Fire Department Run Sheet [Powell Depo Exhibit 2]
C259	Franklin County Public Safety Prehospital Care Report [Turner Depo Exh 2]
C260	Millis Transfer Accident Report [Millis 30b6 Depo Exh 13]
C261	Employer's First Report of Injury or Disease [Millis 30b6 Depo Exh 2]
C262	Employer's Admission of Employee's Right to Compensation [Millis 30b6 Depo Exh 4]
C263	7 photos taken by Anne Hunt
C264	5 photos taken by Clifford Charles Hill
C265	Any ECM data downloaded from the subject vehicle
C266	Photos of the subject tractor-trailer

EXHIBIT NO.	DESCRIPTION
C267	Photos of the roadway and surrounding area where the accident occurred
C268	Zurich's photos of the scene and vehicle [HILL-OD04770-05134]
C269	3/29/03 Police Report for plaintiff's prior (speeding) accident [HILL 003078-003079]
C270	Millis Transfer prior warning regarding operating cell phone while driving [Hill Depo Exh 8]
C271	Plaintiff's Settlement Agreement with Paccar (redacted and un-redacted)
C272	Joshua Hill – Powell Photos for Defense Counsel (IMG_1163 – IMG_1206.jpg)
C273	Plaintiff's Social Media Postings [HILL 002680-002855; 002856-002879]
C274	Photos of plaintiff's injuries
C275	Larry Blankenship's photos of the tractor
C276	Photos of the tractor and its components
C277	Radiology images of plaintiff's injuries
C278	Surrogate Study Photos
C279	"Seat Integrated and Conventional Restraints: A Study of Crash Injury/Fatality Rates in Rollovers" Jeya Padmanaban and Roger A. Burnett
C280	"Modeling the Effects of Seatbelt Pretensioners on Occupant Kinematics During Rollover" William Newberry, William Lai, Michael Carhart, Darrin Richards, Jeffrey Brown and Christine Raasch
C281	Subject seat and any related components
C282	Exemplar seat and any related components
C283	Subject seatbelt and any related components
C284	Exemplar seatbelt and any related components
C285	2014 Kenworth T660 Tractor & Trailer Specifications
C286	Vehicle Specifications Sheet

EXHIBIT NO.	DESCRIPTION
C287	Trailer Specifications and Loading
C288	Subject Vehicle VIN Report by VINlink
C289	2014 Diesel Truck Index, Kenworth T660 Excerpts
C290	Subject Vehicle Build Sheet Excerpts
C291	Georgia Pacific Bill of Lading
C292	2008 Great Dane Trailer VIN Report by VINlink
C293	Reconstruction Diagrams
C294	Speed, Work, & Energy Analysis
C295	Crash Scene Street View Images
C296	Crash Scene Inspection Drone Mapping: Ortho-Mosaic Image
C297	Crash Scene Inspection Drone Mapping: Processing Report
C298	Photographic Analysis Renders
C299	Reconstruction Sequence Renders
C300	Crash Vehicle Engine Control Module Imaging Report
C301	Astronomical Data for Crash Date and Location
C302	Historical Weather Data for Crash Date and Location
C303	Roof Damage Exhibits
C304	Frames from PC Crash Animation
C305	Large Truck Rollover Frequency by Number of Quarter Turns Charts
C306	Technical Reference – Rollover of Heavy Commercial Vehicles
C307	Technical Reference – Friction Applications in Accident Reconstruction
C308	Technical Reference – NHTSA’s Class 8 Truck-Tractor Stability Control Test Track Effectiveness
C309	Technical Reference – Inertial Properties of Commercial Vehicles

EXHIBIT NO.	DESCRIPTION
C310	Technical Reference – Tractor-Trailer Rollover Crash Test
C311	Technical Reference – Timber Utility Pole Fracture Mechanics Due to Non-Deformable and Deformable Moving Barrier Impacts
C312	Technical Reference – Pole and Vehicle Energy Absorption in Lateral Oblique Impacts with Rigid and Frangible Poles
C313	Technical Reference – Wooden Pole Fracture Energy in Vehicle Impacts
C314	Technical Reference – Reconstruction of Rollover Collisions
C315	Technical Reference – Analysis of Rollover Restraint Performance with and without Seat Belt Pretensioner at Vehicle Trip
C316	Technical Reference – A Dynamic Test Procedure for Evaluation of Tripped Rollover Crashes
C317	Technical Reference – Characteristics of Soil-Tripped Rollovers
C318	Technical Reference – Characteristics of On-Road Rollovers
C319	Technical Reference – Testing and Analysis of Vehicle Rollover Behavior
C320	Technical Reference – Physical Evidence Analysis and Roll Velocity Effects in Rollover Accident Reconstruction
C321	Technical Reference – Modeling of Rollover Sequences
C322	Technical Reference – Traffic Accident Reconstruction (book)
C323	Technical Reference – The Traffic-Accident Investigation Manual (book)
C324	Technical Reference – Rollover Crash Tests on Dirt: An Examination of Rollover Dynamics
C325	Mockup Platform Representing Kenworth T660, including suspension seat, seatbelt kit, and tethers
C326	Mockup Platform Representing RollTek Installation, including Inert RollTek System in Sears Atlas 70 Seat, lap-shoulder seatbelt system, and tethers
C327	49 CFR 571.207 Seating Systems
C328	Summary of Millis Transport Rollover Crashes
C329	Timeline – Hill claim
C330	RollTek Tractor-Trailer Test Videos
C331	Injury Diagram: Cervical Spine

EXHIBIT NO.	DESCRIPTION
C332	Injury Diagram: Outer Body
C333	Skull model depicting different regions
C334	Cervical spine model
C335	Illustration of cervical spine compression
C336	Models of subject vehicle showing interaction opportunities for Hill
C337	3D reconstruction of Hill's C-Spine and 3D print of C-spine
C338	AIS scoring for Hill's injuries
C339	Photographs of exemplar Kenworth cab
C340	IMMI Testing CTR02713-001 and CTR02713-002
C341	Inspection photographs showing seat height differential
C342	Photograph of Hill's left frontal head laceration
C343	Models showing bending of cervical spine
C344	Outline of injuries typically associated with lateral bending
C345	AIS scoring for Hill's AIS 2 injuries
C346	Post-accident photographs of truck
C347	Photographs of Hill's treatment
C348	Exhibit 3 to Deposition of Jonathan Eisenstat – Photographs of Hill's head
C349	Seat Integrated and Conventional Restraints: A Study of Crash Injury/Fatality Rates in Rollovers, Padmanaban and Burnett (2008)
C350	Modeling the Effects of Seat Belt Pretensioners on Occupant Kinematics During Rollover, Newberry, <i>et al.</i> (2006)
C351	Analysis of Rollover Restraint Performance with and without Seat Belt Pretensioners at Vehicle Trip, Hare, <i>et al.</i> (2002)
C352	Any document produced during the litigation by any party or non-party
C353	Any exhibit marked at any deposition
C354	Any admissible pleading of the parties or former parties

EXHIBIT NO.	DESCRIPTION
C355	Plaintiff's Discovery Responses
C356	Paccar's Discovery Responses
C357	IMMI's Discovery Responses
C358	CVG's Discovery Responses
C359	CVG National Seating Company's Discovery Responses
C360	Any discovery response by any former party
C361	Any demonstrative exhibits necessary to illustrate/support the opinions of any witness or expert witness
C362	Any document used for impeachment, rebuttal or to refresh the recollection of any witness
C363	Any document or other item referenced by any other party in its portion of the Pre-Trial Order/Exhibit List