

LAW OFFICES OF
JAMES P. CARR
A PROFESSIONAL CORPORATION

11755 WILSHIRE BOULEVARD
SUITE 1170

LOS ANGELES, CALIFORNIA 90025-1543

TELEPHONE
(310) 444-7179
FACSIMILE
(310) 473-0708

JAMES P. CARR
MEMBER OF CALIFORNIA AND MARYLAND
STATE BAR ASSOCIATIONS

August 28, 2000

554383

Office of Defects Investigation
National Highway Traffic Safety Administration
400 7th Street, S.W.
Washington, D.C. 20590

Re: DP92-017; NEF-12jab

Gentlemen:

Enclosed for introduction to your docket regarding an inertial unlatching of Type I seatbelt buckles, please find a copy of the special interrogatories propounded to us by General Motors on this subject and our response thereto.

Thank you.

Very truly yours,

LAW OFFICES OF JAMES P. CARR
A PROFESSIONAL CORPORATION



JAMES P. CARR

JPC/8.22/PS:hm
Enclosure
cc: Syson-Hille & Associates

RECEIVED
CO 082 - 5 AM 10:14
OFFICE
DEFECTS INVESTIGATION

1 JAMES P. CARR, ESQ. (# 75357)
2 LAW OFFICES OF JAMES P. CARR
3 A PROFESSIONAL CORPORATION
11755 Wilshire Blvd., Suite 1170
Los Angeles, California 90025-1517

4 (310) 444-7179

5 Attorney for Plaintiff

6
7
8 SUPERIOR COURT OF THE STATE OF CALIFORNIA
9 FOR THE COUNTY OF LOS ANGELES

11 JERROD HUNTER, a minor, by and
12 through his Guardian ad Litem,
LISA SAMUEL,
13 Plaintiff,

CASE NO. BC 210529

RESPONSE OF PLAINTIFF TO
SPECIAL INTERROGATORIES

14 vs.

15 GENERAL MOTORS CORPORATION;
16 and DOES 1-50, inclusive,
17 Defendants.

18
19 PROPOUNDING PARTY: Defendant, GENERAL MOTORS CORPORATION.

20 RESPONDING PARTY: Plaintiff, JERROD HUNTER.

21 SET NUMBER: Two (2).

22
23 Plaintiff, JERROD HUNTER, responds as follows to the Second Set of Special
24 Interrogatories served upon him by defendant, GENERAL MOTORS CORPORATION.

25
26 INTRODUCTION

27 It should be noted that this responding party has not fully completed an
28 investigation of the facts relating to this case, has not fully completed his discovery in

1 this action and has not completed his preparation for trial. All of the answers
2 contained herein are based only on such information and documents as are presently
3 available and specifically known to this responding party, and disclose only those
4 contentions which presently occur to such responding party. It is anticipated that
5 further discovery, independent investigation, legal research and analysis will supply
6 additional facts, add meaning to the known facts, as well as establish entirely new
7 factual conclusions and legal contentions, all of which may lead to substantial
8 additions to, changes in and variations from the contentions herein set forth. The
9 following interrogatory responses are given without prejudice to responding party's
10 right to produce evidence of any subsequently discovered fact or facts which this
11 responding party may later recall. Responding party accordingly reserves the right to
12 change any and all answers herein as additional facts are ascertained, analyses are
13 made, legal research is completed and contentions are formulated. The answers
14 contained herein are made in a good faith effort to supply as much factual information
15 and as much specification of the legal contentions as is presently known, but should
16 in no way be to the prejudice of plaintiff in relation to further discovery, research or
17 analysis.

18 27. Yes.

19 28. The facts which demonstrate malice on the part of General Motors include,
20 but are not necessarily limited, to the following actions or inactions:

21 (1) Continuous referral to the real world phenomenon of buckle
22 unlatching by the prejudicial term "Parlor Trick."

23 (2) Failure to keep a record of the occurrence of buckle separations in
24 crash and sled tests in violation of General Motors' policies and procedures,
25 including the "Automotive Defect Analysis Procedure." (Nov. 15, 1982, Section 4,
26 p.1.)

27 (3) Failure to pay attention to customer complaints of buckle separation
28 in violation of the same section of the Procedure.

1 (4) Failure to notify the NHTSA of buckle separations in testing prior to
2 the 1992 Defect Investigation, in violation of 49 CFR Part 577.

3 (5) Failure to notify the NHTSA of customer complaints of buckle
4 separation prior to the 1992 Defect Investigation, in violation of 49 CFR Part 577.

5 (6) Failure to honestly, forthrightly and completely respond to NHTSA's
6 1992 Information Request regarding buckle separation.

7 (7) Sponsoring the analysis of inertial unlatching conducted by Failure
8 Analysis Associates, which GM knew was flawed and deceptive.

9 (8) Sanctioning the deliberately false and deceptive testimony of Terry
10 Thomas, Eddie Cooper, Ed Moffatt, et al, regarding the results of that testing.

11 (9) Continuous application of defectively designed seat belt buckles
12 such as the RCF 67/Type I buckle used in the Hunter vehicle, despite knowledge
13 of their failure to remain latched in collisions, for over thirty years.

14 (10) Violation of the GM policy to investigate safety problems vigorously.
15 "INFORMATION THAT HAS THE POTENTIAL TO INVOLVE PERSONAL INJURY IS
16 TO BE GIVEN THE HIGHEST POSSIBLE PRIORITY DURING ALL PHASES OF
17 INVESTIGATION AND ANALYSES. THIS INCLUDES PROMPT ANALYSIS BY
18 DIVISION COMMITTEES AND NOTIFICATION TO DIVISIONAL MANAGEMENT."
19 (Automotive Defect Analysis Procedure, Nov. 15, 1982, Section 5, page 1) Given
20 an accident, a safety belt buckle failure increases the risk of ejection related
21 personal injury, and contact injuries, and, therefore must not be ignored.

22 (11) The hiring of Robert C. Lange to a responsible position within GM.

23 (12) The documented availability of numerous safer design alternatives.

24 (13) The use by General Motors of significantly safer design alternatives
25 in other GM vehicles.

26
27 29. Documents supporting the facts listed in response to the preceding
28 interrogatory, include but are not limited to the following:

1. (1) P. G. Johnson memo, "1965 Cadillac Push-Button Seat Belt Buckle,"
2 October 25, 1964 (GM427 00627).

3 (2) Joint GM/Ford report, "Seat Belt Safety Presentation," May 17, 1966.
4 (Looper v. GM, 000759-000800).

5 (3) Recall 69-0001, December 26, 1968.

6 (4) 49 CFR Part 571, Docket 69-22; Notice No. 1, "While a static test
7 provides an adequate gauge of a seat belt's strength, it is less than wholly
8 satisfactory in other respects; it does not test the effects of inertial loading on
9 buckle latches or release mechanisms....", December 24, 1969.

10 (5) General Motors USG 329 (GM response to 4.), "However, we do
11 agree that an appropriate inertia test for seat belt assembly latch mechanisms is
12 desirable.", March 24, 1970.

13 (6) Docket 69-7, Notice No. 4, "It (the safety belt buckle) must be
14 -releasable at a single point by a pulling or lifting motion only," May 7, 1970.

15 (7) GM USG 372 (GM response to 6.), "The result is that the tried and
16 proven push-button buckle design generally in use on U.S. manufactured vehicles
17 since 1967 would be outlawed. General Motors alone has installed over
18 100,000,000 push-button-type seat belt buckles....," August 3, 1970.

19 (8) Herbert, et al., "Dynamic Tests, for Seat Belts," p.64ff, February 1973.

20 (9) GM Crash Test C-3354, August 12, 1974.

21 (10) Vulcan, et al., "Australian Approach to Motor Vehicle Safety
22 Standards," p. 859, "In May 1972, it was discovered that under certain dynamic
23 loading conditions simulating a severe crash, a particular design of belt buckle
24 could become disengaged." July 14-16, 1975.

25 (11) VTI Rapport, "The significance of some mechanical defects on the
26 dynamics performance of new seat belts," p.III, "It was also observed that, in most
27 tests, shortly after the belts (webbing) failed the buckles opened....," 1976.

28

- 1 (12) Sheahan, "Design of Seat Belts for Reliability," p. 11-12, March 9-11,
2 1976.
- 3 (13) Babitt letter to Secretary of Transportation, August 16, 1976.
- 4 (14) Beal letter to General Motors, May 25, 1977.
- 5 (15) Desjardins, et al., "Aircraft Crash Survival Design Guide Volume I -
6 Design Criteria and Checklists," p.107-8, September 1977 - August 1980.
- 7 (16) NHTSA, "Tests of 1975 Chevrolet Monza Seat Belt Latching
8 Mechanisms," March 1978.
- 9 (17) Ford Crash Test CT-3888 (GM pickup truck), June 12, 1978.
- 10 (18) Mackay, "Function Versus Appearance in Vehicle Design," October
11 23-24, 1978.
- 12 (19) AETL, "1978 International Scout 30 MPH Crash Test," NHTSA
13 781301, November 27, 1978.
- 14 (20) Chiang and Ostrosky, "Alleged failure of Seat Belt Buckle on 1975
15 Chevrolet Monza 2+2: EA7-040," October 24, 1979.
- 16 (21) Ditlow letter to MVMA, "Buckle failures are also reported frequently,
17 with similar consequences," November 29, 1979.
- 18 (22) Dynamic Science, "1980 Honda Prelude," NHTSA rear crash test,
19 August 11, 1980.
- 20 (23) Magyar, "US Patent No. 4,358,879, and related GM documents
21 produced in Rogers v. GM," November 16, 1982.
- 22 (24) Calspan, "1984 Plymouth Conquest," NHTSA frontal crash test,
23 January 1984.
- 24 (25) NHTSA ODI reports including: 361781, H83842,349381 (Blazer),
25 333607, 347484, H7085I (Blazer), H62240, 355614, 328978, 309486, H96599,
26 H69112, H46386, 083105, H81388, 347802, reported before July 30, 1990.
- 27 (26) GM Crash Test C8616, June 17, 1991.
- 28 (27) GM Crash Test C8819, December 16, 1991.

1 (28) Detloff, "Deposition in Milam v. GM," p.49, March 24, 1992.

2 (29) Takata/Gateway, "Type VI Buckle Impact Test," (same buckle that
3 failed in tests C8616 and C8819), July 1, 1992.

4 (30) Chute and Bertelson, memo to SAE Seat Belt Committee, July 15,
5 1992.

6 (31) Pfabe, "Deposition in Brower v. BMW," p.55-6, September 21, 1992.

7 (32) GM 1241 Report of Preliminary Investigation, including but not
8 limited to those produced to NHTSA in October 1992.

9 (33) Thomas, et al., "An Investigation of Seat Belt Buckle Dynamic
10 Response to Inertial Loading Conditions," Failure Analysis Associates, prepared
11 for General Motors Corporation, FaAA-AZ-R-92-11-09, November 12, 1992.

12 (34) Howe, et al, "Tests Regarding Alleged Inertial Unlatching of Safety
13 Belt Buckles," November 1992.

14 (35) Magyar, "Deposition in Tipton v. GM," March 17, 1993.

15 (36) Larson, "Peak Acceleration relationship to pulse duration," March 29,
16 1993.

17 (37) FaAA, "Hip Impact Tests," July 1993.

18 (38) Moffatt, et al, "Rollover Crash Tests to Evaluate Seatbelt Buckle
19 Inertial Loading," SAE/TOPTec, August 25, 1993.

20 (39) Arndt, "Characterization of Automotive Seat Belt Buckle Inertial
21 Release," November 4-6, 1993.

22 (40) Takata Brochure, "Seat Belt Systems and Components," 1995.

23 (41) Syson, "Seat Belt Buckle Separation - Fact or Fiction?" February 13-
24 16, 1995.

25 (42) Limbert, "GM TIR Review, FaAA Job No. PHO4761/C," June 28, 1995.

26 (43) Andreatta, et al, "An Analytical Model of the Inertial Opening of Seat
27 Belt Latches," February 1996.

28

- 1 (44) FAA, "General Aviation Airworthiness Alerts: AC No. 43-16," Alert No.
2 212, March 1996.
- 3 (45) Salmon, "Crashworthiness of Automobile Mechanisms," ASME, 1997.
- 4 (46) Blick, et al., "Why Do Seat Buckles Inertially Unlatch in Auto
5 Crashes," ASME, February 22, 1997.
- 6 (47) Other claims, including but not limited to lists compiled by J. Kendall
7 Few, January 22, 1998.
- 8 (48) Few, et al., "Seat Belt Buckle Safety Study," August 1998.
- 9 (49) Sances, et al., "Experimental Investigation and Finite Element
10 Analysis of Vehicle Restraint Systems," ASME, June 16-20, 1999.
- 11 (50) Sances, "Biomechanical Analysis of Restraint Receptacles," ASME,
12 June 16-20, 1999.
- 13 (51) Few, et al., "Seat Belt Buckle Safety Study," August 1999.
- 14 (52) Depositions and trial testimony of other victims.
- 15 (53) Depositions, reports and trial testimony of David Peruski.
- 16 (54) Depositions of Edwin E. Conner.
- 17 (55) Depositions and Trial Testimony of Terry Thomas (particularly
18 regarding test zero).
- 19 (56) Branigan, "Defending Seat Belt Buckle Inertial Unlatch Claims,"
20 Internet.
- 21 (57) Syson, personal review of approximately 1000 U.S. and foreign seat
22 belt buckle patents, ongoing.
- 23 (58) Documents produced by GM and Ford in other inertial unlatch
24 cases, including Blakovich v. Ford, Somerville v. GM, Jones v. GM, Looper v.
25 G.M., Malone v. GM, etc.
- 26 (59) Deposition of General Motors designee Gerald Cooper, taken in this
27 case on November 9, 1999.
- 28

1, 30. Persons with knowledge or information supporting the contention set forth
2 above include, but are not limited to, the following:

3 (1) Authors of articles, deponents and victims in Items 1 through 59,
4 above.

5 (2) Inventors of approximately 400 patented safety belt buckles that are
6 intended to not inertially unlatch.

7 (3) Employees of various agencies hired by GM to investigate inertial
8 unlatch claims, including but not limited to the ESIS GM claims unit, Southern
9 Investigations, investigators into 1241's produced in Mannor v. GM, G.M. Zone
10 Office employees (including former employees such as Donald Brown). other
11 investigators hired by Royal Globe/Royal Insurance.

12 (4) Engineers and Test Technicians responsible for conducting and
13 analyzing the J-Car crash and sled tests with buckle failures produced in Tierney
14 v. GM (including but not limited to Tom Wood); the test engineers and technicians
15 that ran the S-T and C/K truck crash kind sled tests produced in Bradley v. GM;
16 the GM employees responsible for the A-body sled tests, produced in Dutton v.
17 GM; GM employees responsible for the analysis of the buckle failures in crash and
18 sled tests produced in DeLaRosa (S7484, S7900, S7227, S6729, S7480, S7225,
19 S6725, S6699, C5319 and S7060); GM employees responsible for the testing and
20 analysis of the buckle failures in the tests produced in Kumle v. GM;
21 GM employees responsible for the analysis of the side release buckle failures in
22 crash and sled tests produced in Trevino v. GM.

23 (5) Ford employees responsible for or knowledgeable about the
24 Corporate Inertial Unlatch Policy, including but not limited to Ed Paddock.

25 (6) GM corporate counsel.

26 (7) Victims of Type I buckle failures in competitive vehicles, including but
27 not limited to Wendy Wiitala, James Macris, Daniel Trail, Donald Nelson, Dean
28

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

Gould and Jennifer Blakovich. (See list of claimants identified by Ford in Blakovich.)
(8) Employees of manufacturers of Type I buckles.
(9) Descendants/heirs of Robert Cripps Fisher.
(10) Employees of Calspan, Dynamic Science, and AETL who were present when Type I buckles failed, including but not limited to Mark Pozzi.
(11) GM employee, Paul Simpson.

31. Yes.

32. Please see response to Interrogatory No. 28, which is incorporated by reference.

33. Please see response to Interrogatory No. 29, which is incorporated by reference.

34. Please see response to Interrogatory No. 30, which is incorporated by reference.

35. Please see list of facts set forth in response to Interrogatory No. 28, which is incorporated by reference.

36. Please see documents listed in response to Interrogatory No. 29, which is incorporated by reference.

37. Please see response to Interrogatory No. 30, which is incorporated by reference.

38. Please see response to Interrogatory No. 28, which is incorporated by reference.

39. Please see response to Interrogatory No. 29, which is incorporated by reference.

40. Please see response to Interrogatory No. 30, which is incorporated by reference.

1 41. Facts supporting the contention that GM knew (or should have known)
2 since the early 1960's that side release buckles would inertially unlatch include, but air,
3 not limited to:

4 (1) GM analyzed and tested Cadillac buckles designed by Robert Cripps
5 Fisher.

6 (2) Bill Cichowski admitted in an SAE paper that GM sled tests resulted
7 in buckle separation.

8 (3) Inventors patented seat belt buckles that were designed to reduce
9 the risk of inertial unlatch, or identified the risk of inertial unlatch, before 1965,

10 (4) Robert Cripps Fisher patented an inertially resistant buckle. The
11 patent was applied for in the mid 1960's.

12 (5) The California Highway Patrol tested seat belts in the early 1960's.
13 Some of the buckles separated (as referenced in GM documents).

14
15 42. Documents supporting this contention include, but are not limited to, the
16 following:

17 (1) P. G. Johnson memo, "1965 Cadillac Push-Button Seat Belt Buckle,"
18 October 25, 1964 (GM427 00627).

19 (2) Cichowski, "A New Device for Passenger Car Safety Studies," SAE
20 Transactions (1964).

21 (3) U.S. Patents: 2,153,077; 2,164,447; 2,590,851; 2,876,516; 2,880,789;
22 2,941,272; 2,999,288; 3,046,982; 3,104,439; 3,118,208; 3,126,227; 3,127,655;
23 3,130,466; 3,144,696; 3,145,442; 3,146,846; 3,147,995; 3,153,270; 3,156,025 and
24 Foreign Patents GB 483,783; GB 695,255; FR 709,162; CA 575,538.

25 (4) U.S. Patent 3,449,800.

26 (5) Joint GM/Ford report, "Seat Belt Safety Presentation," May 17, 1966.
27 (Looper v. GM, 000759-000800.)
28

1 43. Persons having knowledge or information supporting plaintiff's contentions
2 include but are not limited to, the authors of articles and patent holders identified in
3 Items 1 through 5, set forth in response to the preceding interrogatory.

4 44. Facts supporting the contention that GM determined that side release
5 buckles could inertially unlatch and have inertially unlatched include, but are not limited
6 to, the following:

7 (1) Bill Cichowski's admission that buckles have unlatched in sled tests.

8 (2) GM's request to R. C. Fisher to eliminate the "Parlor Trick" defect
9 from his buckle designs.

10 (3) GM's use of safer alternative design seat belt buckles in Europe and
11 Australia where dynamic testing with a rigid test dummy is required for Type
12 Approval.

13 (4) GM's use of pendulum and centrifuge component tests to evaluate
14 buckles.

15 (5) GM crash test, sled test and customer complaint buckle failures.

16 (6) Buckle tests conducted by suppliers and contractors, such as
17 Takata/Gateway and Hoechst/Pegasus.

18
19 45. Documents supporting the contention that GM determined that side release
20 buckles could inertially unlatch and have inertially unlatched include but are not limited
21 to the following:

22 (1) P. G. Johnson memo, "1965 Cadillac Push-Button Seat Belt Buckle,"
23 October 25, 1964 (GM427 00627).

24 (2) Joint GM/Ford report, "Seat Belt Safety Presentation," May 17, 1966.
25 (Looper v. GM, 000759-000800).

26 (3) Recall 69-0001, December 26, 1968.

27 (4) General Motors USG 329 (GM response to 49 CFR Part 571, Docket
28 69-22; Notice No. 1), March 24, 1970.

- 1 (5) GM Crash Test C-3354, August 12, 1974.
- 2 (6) Beal letter to General Motors, May 25, 1977.
- 3 (7) NHTSA, "Tests of 1975 Chevrolet Monza Seat Belt Latching
- 4 Mechanisms," March 1978.
- 5 (8) Chiang and Ostrosky, "Alleged Failure of Seat Belt Buckle on 1975
- 6 Chevrolet Monza 2+2: EA7-040" October 24, 1979.
- 7 (9) Ditlow letter to MVMA, "Buckle failures are also reported frequently,
- 8 with similar consequences," November 29, 1979.
- 9 (10) Magyar, "US Patent No. 4,358,879, and related GM documents
- 10 produced in Rogers v. GM," November 16, 1982.
- 11 (11) NHTSA ODI reports including- 361,781, H83842,349381 (Blazer),
- 12 333607, 347484, H70851 (Blazer), H62240, 355614, 328978, 309486, H96599,
- 13 H69112, H46386, 083105, H81388, 347802, reported before July 30, 1990.
- 14 (12) GM Crash Test C8616, June 17, 1991.
- 15 (13) GM Crash Test C8819, December 16, 1991.
- 16 (14) Detloff, "Deposition in Milam v. GM," p. 49, March 24, 1992.
- 17 (15) Takata/Gateway, "Type VI Buckle Impact Test," (same buckle that
- 18 failed in tests C8616 and C8819), July 1, 1992.
- 19 (16) Chute and Bertelson, memo to SAE Seat Belt Committee, July 15,
- 20 1992.
- 21 (17) GM 1241 Reports of Preliminary Investigation. including but not
- 22 limited to those produced to NHTSA in October 1992.
- 23 (18) Thomas, et al., "An Investigation of Seat Belt Buckle Dynamic
- 24 Response to Inertial Loading Conditions," Failure Analysis Associates, prepared
- 25 for General Motors Corporation, FaAA-AZ-R-92-11-09, November 12, 1992.
- 26 (19) Howe, et al, "Tests Regarding Alleged Inertial Unlatching of Safety
- 27 Belt Buckles," November 1992.
- 28 (20) Magyar, "Deposition in Tipton v. GM," March 17, 1993.

- 1 (21) Larson, "Peak Acceleration relationship to pulse duration," March 29,
2 1993.
- 3 (22) FaAA, "Hip Impact Tests," July 1993.
- 4 (23) Moffatt, et al., "Rollover Crash Tests to Evaluate Seatbelt Buckle
5 Inertial Loading," SAE/TOPTec, August 25, 1993.
- 6 (24) Limbert, "GM TIR Review, FaAA job No. PH04761/C," June 28, 1995.
- 7 (25) Other claims, including but not limited to lists compiled by J. Kendall
8 Few, January 22, 1998.
- 9 (26) Few, et al., "Seat Belt Buckle Safety Study," August 1998.
- 10 (27) Few, et al., "Seat Belt Buckle Safety Study," August 1999.
- 11 (28) Depositions and trial testimony of other victims.
- 12 (29) Depositions, reports and trial testimony of David Peruski.
- 13 (30) Depositions of Edwin E. Conner.
- 14 (31) Depositions and Trial Testimony of Terry Thomas (particularly
15 regarding "test zero".)
- 16 (32) Branigan, "Defending Seat Belt Buckle Inertial Unlatch Claims,"
17 Internet.
- 18 (33) Documents produced by GM and Ford in other inertial unlatch
19 cases, including Blakovich v. Ford, Somerville v. GM, Jones v. GM, Looper v. GM,
20 Malone v. GM, etc.

21

22 46. Persons having knowledge or information supporting plaintiff's contention
23 include, but are not limited to:

24 (1) Authors of articles, deponents and victims in Items 1 through 33 of
25 the preceding interrogatory response.

26 (2) Employees of various agencies hired by GM to investigate inertial
27 unlatch claims, including but not limited to the ESIS GM claims unit, Southern
28 Investigations, investigators into 1241's produced in Mannor v. GM, GM Zone

1 Office employees (including former employees such as Donald Brown), other
2 investigators hired by Royal Globe/Royal Insurance.

3 (3) Engineers and Test Technicians responsible for conducting and
4 analyzing the J-car crash and sled test with buckle failures produced in Tierney
5 v. GM, (including but not limited to Tom Wood), the test engineers and
6 technicians that ran the S-T and C/K truck crash and sled tests produced in
7 Bradley N. GM, the GM employees responsible for the A-body sled tests
8 produced in Dutton v. GM, GM employees responsible for the analysis of the
9 buckle failures in crash and sled tests produced in DeLaRosa, (S7484, S7900,
10 S7227, S6729, S7480, S7225, S6725, S6699, C5319 and S7061), GM employee*
11 responsible for the testing and analysis of the buckle failures in the tests produced
12 in Kumle v. GM, GM employees responsible for the analysis of the side release
13 buckle failures in crash and sled tests produced in Trevino v. GM.

14 (4) Ford employees responsible for or knowledgeable about the
15 Corporate Inertial Unlatch Policy, including but not limited to Ed Paddock.

16 (5) GM corporate counsel.

17 (6) GM employee Paul Simpson.

18
19 47. Facts supporting the contention that NHTSA attempted to outlaw side
20 release buckles include, but are not limited to:

21 (1) In 1970, the NHTSA issued a notice of proposed rulemaking that
22 would have required seat belt buckles that operated with a lever action. As GM
23 correctly noted, that rule-making action would outlaw push-button buckles.

24
25 48. Documents supporting this contention include, but are not limited to, the
26 following:

27 (1) Docket 69-7, Notice No. 4, "It (the safety belt buckle) must be
28 releasable at a single point by a pulling or lifting motion only," May 7, 1970.

1 (2) GM USG 372 (GM response to 1), "The result is that the tried and
2 proven push-button buckle design generally in use on U.S. manufactured vehicles
3 since 1967 would be outlawed. General Motors alone has installed over
4 100,000,000 push-button-type seat belt buckles...." August 3, 1970.
5

6 49. Persons having knowledge or information supporting plaintiff's contention
7 include, but are not limited to, the following:

8 (1) NHTSA personnel responsible for the promulgation of Docket 69-7,
9 Notice No. 4.

10 (2) General Motors personnel responsible for USG 372.
11

12 50. Facts supporting the contention that General Motors designed or contracted
13 for the design of safer buckles include, but are not limited to:

14 (1) GM's request to R.C. Fisher to eliminate the "Parlor Trick" defect from
15 his buckle designs.

16 (2) Fisher patent for a counterbalanced buckle.

17 (3) GM's use of the Firestone Patent buckle in the 1969 Corvette.

18 (4) Wording of the Firestone Patent.
19

20 51. Documents supporting the facts set forth in response to the preceding
interrogatory include, but are not limited to:

21 (1) P. G. Johnson memo, "1965 Cadillac Push-Button Seat Belt Buckle,
22 "October 25, 1964 (GM427 00627).

23 (2) U.S. Patent 3,449,800.

24 (3) 1969 Corvette seatbelt obtained by Sean Drew.

25 (4) U.S. Patent 3,481,009.
26

27 52. Persons having knowledge or information supporting plaintiff's contention
include, but are not limited to, authors of the memoranda and patent holders referred to
28 in Items 1 through 4 of the preceding response.

1 53. Facts supporting the contention that General Motors has repeatedly denied
2 that inertial unlatching can occur in real world accidents include, but are not limited to:

3 (1) Testimony of Ed McKenna in Tipton v. GM that the concept of inertial
4 buckle opening was "hogwash."

5 (2) Testimony of GM representatives, including Mr. McKenna and Mr.
6 EISabeh, in other trials that inertial unlatching cannot happen "in the real world."

7 (3) GM submissions to NHTSA regarding the N-car and H-car side
8 impact crash tests where side release buckles failed.

9 (4) Pleadings filed in various courts in other inertial unlatching cases.

10 (5) Mr. Branigan's article.

11 (6) Deposition testimony in this case of General Motors designee,
12 Gerald Cooper, November 9, 1999.

13
14 54. Documents supporting the above facts include, but are not limited to:

15 (1) Deposition and trial transcripts in Sutton v. GM, Tipton v. GM,
16 Malone v. GM, Burris v. GM, Jones v. GM, Loomer v. GM, Bradley v. GM, etc.

17 (2) Limbert, "GM TIR Review, FaAA Job No. PHO4761/C," June 28, 1995.

18 (3) Pleadings filed in Sutton v. GM, Tipton v. GM, Malone v. GM, Burris
19 v. GM, Jones v. GM, Loomer v. GM, Bradley v. GM, etc.

20 (4) Branigan, "Defending Seat Belt Buckle Inertial Unlatch Claims,"
21 Internet.

22 (5) Deposition in this case of Gerald Cooper, November 9, 1999.

23 55. Persons having knowledge or information supporting plaintiff's contention
24 include, but are not limited to, the authors of memoranda and deponents, witnesses and
25 defense counsel in items 1 through 4 of the preceding interrogatory response.

26 56. Facts supporting the contention that General Motors has repeatedly advised
27 the government that inertial unlatching does not occur in real world accidents include,
28 but are not limited to:

1 (1) General Motors' denial of the validity of inertial unlatching claims in
2 response to the 1992 NHTSA investigation.

3 (2) General Motors' responses after the 1992 investigation was closed,
4 regarding the N-car and H-car buckle failures, claiming that the SID test dummy
5 has a stiffer hip area than human test subjects. GM's further claim, based on that
6 erroneous analysis of dummy biofidelity, that buckle contact with human hips is
7 unlikely to cause buckle opening.

8
9 57. Documents supporting the above facts include, but are not limited to:

10 (1) GM response to 1992 investigation and attachments.

11 (2) GM supplemental responses to 1992 investigation and
12 enhancements.

13
14 58. Persons having knowledge or information supporting plaintiff's contention
15 include, but are not limited to the authors of items identified in response to the preceding
16 interrogatory, including but not limited to Dave Peruski and Ed Conner.

17 59. Facts supporting the contention that General Motors did not provide a
18 complete and truthful response to the NHTSA 1992 investigation include, but are not
19 limited to:

20 (1) More claims of inertial unlatching have been produced in various
21 litigation matters than GM provided to NHTSA.

22 (2) GM had many failures of side release buckles in sled tests that were
23 not disclosed to NHTSA.

24 (3) GM had many failures of side release buckles in crash tests that
25 were not disclosed to NHTSA.

26 (4) GM did not disclose to NHTSA that they had contracted with
27 independent test laboratories, such as Hoechst/Pegasus, to conduct inertial
28 unlatch testing.

1 (5) GM did not disclose to the NHTSA that they routinely denied claims
2 of buckle separation without a thorough investigation.

3 (6) GM did not disclose to NHTSA, nor have they provided to plaintiffs
4 in litigation, the centrifuge testing identified by Clem Detloff in his deposition in the
5 Milam case.

6 (7) GM did not disclose to NHTSA that they had never conducted a
7 Failure Mode and Effects Analysis regarding the safety of side release seat belt
8 buckles when subjected to crash forces.

9 (8) GM did not disclose to NHTSA that they taught their claims
10 personnel to test for buckle defects by impacting the back side of the buckle.

11 (9) GM did not disclose to NHTSA that data from one of the S-Blazer
12 rollover tests conducted by FaAA was being withheld.

13 (10) GM did not disclose to NHTSA that the hip biofidelity analysis was
14 biased by inappropriately averaging the hip stiffness of various test dummy sizes.

15 (11) GM did not disclose to NHTSA that safety belt buckles with design
16 features intended to minimize the risk of inertial unlatch were prevalent on its
17 products in every country in the world except the United States and Canada.

18
19 60. Documents supporting the above factual allegations include, but are not
20 limited to:

- 21 (1) Lists of claims compiled by Kendall Few, January 22, 1998.
22 (2) Sled tests produced in Tierney, Bradley, DeLaRosa, Dutton, Trevino,
23 etc.
24 (3) Crash tests produced in Kumle, Bradley, DeLaRosa, Trevino, etc.
25 (4) Purchase order produced in Peterson v. GM.
26 (5) Deposition and trial transcript of the testimony of Donald Brown in
27 the matter of Jones v. General Motors.
28 (6) Detloff deposition, March 24, 1992.

1 (7) Latest FMEA produced in Jackson v. General Motors.

2 (8) Deposition and trial transcript of the testimony of Donald Brown in
3 the Matter of Jones v. General Motors.

4 (9) Testimony of Terry Thomas, including that at trial in Sexton v. Ford.

5 (10) FaAA, "Hip Impact Tests," July 1993.

6 (11) Few, et al., "Seat Belt Buckle Safety Study," Aug. 1998, Aug. 1999.

7
8 61. Persons having knowledge or information supporting plaintiff's contentions
9 include, but are not limited to:

10 (1) Authors of reports, memoranda and FMEA, and deponents,
11 witnesses and defense counsel in Items 1 through 11 of the preceding
12 interrogatory.

13 (2) Employees of Hoechst/Pegasus.

14 (3) GM employees including, but not limited to, Ed Conner and Dave
15 Peruski.

16
17 62. Facts supporting the contention that General Motors did not provide critical
18 test data to the NHTSA 1992 investigation include, but are not limited to:

19 (1) GM had many failures of side release buckles in sled tests that were
20 not disclosed to NHTSA.

21 (2) GM had many failures of side release buckles in crash tests that
22 were not disclosed to NHTSA.

23 (3) GM did not disclose to NHTSA that they had contracted with
24 independent test laboratories, such as Hoechst/Pegasus, to conduct inertial
25 unlatch testing.

26 (4) GM did not disclose to NHTSA, nor have they provided to plaintiffs
27 in litigation, the centrifuge testing identified by Clem Detloff in his deposition in the
28 Milam case.

1 (5) GM did not disclose to NHTSA that data from one of the S-Blazer
2 rollover tests conducted by FaAA was being withheld.

3 (6) GM did not disclose to NHTSA that the hip biofidelity analysis was
4 biased by inappropriately averaging the hip stiffness of various test dummy sizes.

5
6 63. Documents supporting the above factual allegations include, but are not
7 limited to:

8 (1) Sled tests produced in Tierney, Bradley, DeLaRosa, Dutton, Trevino,
9 etc.

10 (2) Crash tests produced in Kumle, Bradley, DeLaRosa, Trevino, etc.

11 (3) Purchase order produced in Peterson v. GM.

12 (4) Detloff deposition, March 24, 1992.

13 (5) Testimony of Terry Thomas, including Sexton v. Ford.

14 (6) FaAA, "Hip Impact Tests," July 1993.

15
16 64. Persons having knowledge or information supporting plaintiff's contentions
17 include, but are not limited to:

18 (1) Authors of reports, memoranda and FMEA, and deponents,
19 witnesses, and defense counsel in items 1-6 of the preceding interrogatory
20 response.

21 (2) Employees of Hoechst/Pegasus.

22 (3) GM employee, including but not limited to Ed Conner and
23 Dave Peruski.

1
2 65. General Motors' responses to NHTSA Information Requests and GM
3 submissions to the NHTSA Docket are, and were, presented for the approval and
4 consideration of one or more of the following groups of high level GM officials:

- 5 1. General Technical Committee
6 2. GM Legal
7 3. Safety Review Board
8 4. Chief Engineer's Meeting
9 5. Director of Automotive Safety Engineering
10 6. Director of Environmental Activities Staff

11
12 66. Documents supporting or relating to this contention include the following:

- 13 1. GTC and SRB meeting minutes produced in McDonald v. GM.
14 2. Chief Engineer's meeting minutes produced in McDonald G. GM and
15 other cases.
16 3. Letters to NHTSA signed by David E. Martin and Betsy Anker Johnson.
17 4. Other GM submissions to the Docket.
18 5. SAE papers and other presentations regarding GM Safety management
19 and organization.

20
21 67. Persons having knowledge regarding these facts would include, but not
22 necessarily be limited to, the following:

- 23 1. Present and former GM employees: Donald P. Reed, Gary Bahling,
24 Thomas Terry, Louis B. Lundstrom, Mr. Martin, Ms. Johnson Edwin Conner.
25 2. Employees of GM Legal Staff, including but not limited to Harry Pearce.
26 3. GM Chief Engineers.
27 4. GTC and SRB members.
28 5. Author(s) of articles regarding GM safety management.

1 68. Please see response to Interrogatory No. 44 which is incorporated by
2 reference.

3
4 69. Please see response to Interrogatory No. 45 which is incorporated by
5 reference.

6
7 70. Please see response to Interrogatory No. 46 which is incorporated by
8 reference.

9
10 71. Please see response to Interrogatory No. 38 which is incorporated by
11 reference.

12
13 72. Please see response to Interrogatory No. 39 which is incorporated by
14 reference.

15
16 73. Please see response to Interrogatory No. 40 which is incorporated by
17 reference.

18
19 74. Please see response to Interrogatory No. 50 which is incorporated by
20 reference.

21
22 75. Please see response to Interrogatory No. 51 which is incorporated by
23 reference.

24
25 76. Please see response to Interrogatory No. 52 which is incorporated by
26 reference.

27
28 77. Documents produced in other cases indicate that the Type I buckles' only

1 virtue was its low cost.

2
3 78. In the matter of Berger/Samuel v. Ford, the comparative costs of the
4 Type I, and alternative designs were discussed, along with design guidelines for
5 suggested replacement buckles. These documents have been provided to GM in the
6 Martinez v. GM matter.

7
8 79. GM Purchasing and Cost Analysis departments, authors of
9 Berger/Samuel documents.

1 80. GM has patented numerous seat belt buckles, and, as part of the patent
2 process has had the opportunity and obligation to search the publicly available patent
3 literature.

4
5 81. See patent references in GM-held patents, and in patents for buckles
6 used by GM.

7
8 82. Persons knowledgeable about the patent availability include, but are not
9 limited to:

- 10 1. GM Patent and Legal Liaison
11 2. Other patent attorneys hired by GM
12 3. J. Kendall Few
13 4. Present and former GM employee patent holders, including employees
14 of former GM subsidiary European Components Corporation in Northern Ireland.

15
16 83. Besides the obvious direct damages in lawsuits that existed at the time
17 of the denials of the validity of unlatch claims, GM faces additional potential litigation
18 expense as a consequence of those fraudulent denials since there is, in most states, no
19 statute of limitations on fraud. Therefore, many lawsuits that GM has successfully
20 defended, or settled with limited expense, would once again have to be tried. GM's efforts
21 to defend lawsuits are replete with examples of fraud and deceit, for example:

22 1. General Motors has suborned, and even encouraged, perjury in
23 sidesaddle gas tank and other fuel system integrity cases. See, for example, recent
24 decisions in Georgia regarding the testimony of Ed Ivey.

25 2. GM and its counsel have been sanctioned in many courts throughout the
26 United States for discovery abuse. In several states, sanctions have extended to judicial
27 declarations of defect, or the striking of defendant's pleadings.

28 3. One of GM defense counsel has been declared untrustworthy by the

1 Supreme Court of Arizona.

2
3 84. Documents supporting the above allegations include, but are not limited
4 to, the following:

5 1. Documents and transcripts of testimony in GM gas tank cases handled
6 by plaintiff's attorneys Brian Panish and James Butler.

7 2. The investigation of the conduct of Kenneth Starr as GM defense
8 counsel.

9 3. The AIEG investigation of GM discovery abuse (Darrel Peters).

10 4. The sanctioning of one of GM's gas tank counsel by the State of Arizona.

11
12 85. Knowledgeable people include, but are not limited to, the following:

13 1. GM corporate counsel, including but not limited to Harry Pearce.

14 2. GM trial counsel, including but not limited to Tom Branigan.

15 3. Kendall Few.

16 4. Kenneth Starr.

17 5. Ed Ivey.

18 6. Brian Panish and James Butler.

19
20 86. Please see response to Interrogatory No. 53 which is incorporated by
21 reference.

22
23 87. Please see response to Interrogatory No. 54 which is incorporated by
24 reference.

25
26 88. Please see response to Interrogatory No. 55 which is incorporated by
27 reference.

1 89. Please see response to Interrogatory No. 53 which is incorporated by
2 reference.

3
4 90. Please see response to Interrogatory No. 54 which is incorporated by
5 reference.

6
7 91. Please see response to Interrogatory No. 55 which is incorporated by
8 reference.

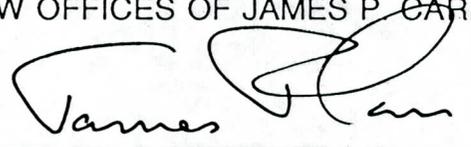
9
10 92. The fraud perpetrated by GM is obvious based on the data and
11 documents previously identified in these interrogatories responses. GM deliberately and
12 falsely denied the existence of seat belt separation due to inertial forces in real world
13 accidents, despite numerous test failures and consumer complaints for which the only
14 reasonable scientific explanation was impact related buckle failure.

15
16 93. Please see response to Interrogatory No. 54 which is incorporated by
17 reference.

18
19 94. Please see response to Interrogatory No. 55 which is incorporated by
20 reference.

21
22 DATED: June 14, 2000

LAW OFFICES OF JAMES P. CARR

23
24 By 

JAMES P. CARR
Attorney for Plaintiff

25
26
27
28 JPC/6.5/PS:hm

VERIFICATION

STATE OF CALIFORNIA, COUNTY OF VENTURA

I have read the foregoing RESPONSE OF PLAINTIFF TO SPECIAL INTERROGATORIES

and know its contents.

CHECK APPLICABLE PARAGRAPH

I am a party to this action. The matters stated in the foregoing document are true of my own knowledge except as to the matters which are stated on information and belief, and as to those matters I believe them to be true.

I am an Officer a partner _____ a _____ of _____

a party to this action, and am authorized to make this verification for and on its behalf, and I make this verification for that reason. I am informed and believe and on that ground allege that the matters stated in the foregoing document are true. The matters stated in the foregoing document are true of my own knowledge except as to those matters which are stated on information and belief, and as to those matters I believe them to be true.

I am one of the attorneys for _____, a party to this action. Such party is absent from the county of aforesaid where such attorneys have their offices, and I make this verification for and on behalf of that party for that reason. I am informed and believe and on that ground allege that the matters stated in the foregoing document are true.

Executed on June 23, 2000, at Thousand Oaks, California. I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

LISA SAMUEL, Guardian Ad Litem of
JERROD HUNTER

Type or Print Name

Lisa Samuel
Signature

PROOF OF SERVICE

1013A (3) CCP

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

BY MAIL

I am employed in the county of Los Angeles, State of California.

I am over the age of 18 and not a party to the within action; my business address is:
11755 Wilshire Boulevard, Suite 1170, Los Angeles, California 90025-

On June 27, 2000, I served the foregoing document described as RESPONSE OF PLAINTIFF TO SPECIAL INTERROGATORIES

_____ on all parties in this action

by placing the true copies thereof enclosed in sealed envelopes addressed as stated on the attached mailing list:

by placing the original a true copy thereof enclosed in sealed envelopes addressed as follows:

SNELL & WILMER
P.O. Box 19601, Irvine, CA. 92623-9601
Attention: Ellen L. Darling, Esq.

*I deposited such envelope in the mail at Los Angeles, California. The envelope was mailed with postage thereon fully prepaid.

As follows: I am "readily familiar" with the firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with U.S. postal service on that same day with postage thereon fully prepaid at _____ California in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing in affidavit.

Executed on June 27, 2000, at Los Angeles, California.

*(BY PERSONAL SERVICE) I delivered such envelope by hand to the offices of the addressee.

Executed on _____, 20____, at _____, California.

(State) I declare under penalty of perjury under the laws of the State of California and of my own personal knowledge that the above is true and correct.

(Federal) I declare that I am employed in the office of a member of the bar of this court at whose direction the service was made.

Delores A. Menefield

Type or Print Name

Delores A. Menefield
Signature

1 Gary A. Wolensky (#154041)
2 Ellen L. Darling (#149627)
3 Elizabeth K. Vanis (#192455)
4 SNELL & WILMER LLP.
5 1920 Main Street, Suite 1200
6 Irvine, CA 92614-7060
7 Telephone: (949) 253-2700

8 Attorneys for Defendant
9 GENERAL MOTORS CORPORATION

10
11 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
12 **FOR THE COUNTY OF LOS ANGELES**

13 JERROD HUNTER, a minor, by and
14 through his Guardian ad Litem, LISA
15 SAMUEL,

16 Plaintiff,

17 vs.

18 GENERAL MOTORS CORPORATION;
19 KEVIN McDONALD; and DOES 1-50,
20 inclusive,

21 Defendants.

CASE NO. BC 210529

Assigned to Judge Kenneth R. Freeman
Department 64

**GENERAL MOTORS CORPORATION'S
SPECIAL INTERROGATORIES, SET
TWO, TO PLAINTIFF JERROD HUNTER**

Complaint Filed: May 18, 1999
Trial Date: December 16, 2000

22 PROPOUNDING PARTY: Defendant, GENERAL MOTORS CORPORATION

23 RESPONDING PARTY: Plaintiff, JERROD HUNTER, a minor, by and through his
24 Guardian ad Litem, LISA SAMUEL

25 SET NO.: Two

26 Defendant GENERAL MOTORS CORPORATION ("GMC") requests that within thirty
27 (30) days after service of these interrogatories, pursuant to Section 2030 of the California Code of
28 Civil Procedure, plaintiff answer, in writing and under oath, the following special interrogatories.

///

///

1 that person's rights.)?

2 INTERROGATORY NO. 32:

3 If YOUR response to interrogatory no. 5 was anything other than an unqualified "no",
4 state in complete detail the factual basis for YOUR contention.

5 INTERROGATORY NO. 33:

6 If YOUR response to interrogatory no. 5 was anything other than an unqualified "no",
7 IDENTIFY ALL DOCUMENTS or tangible things that support or otherwise relate to YOUR
8 contention.

9 INTERROGATORY NO. 34:

10 If YOUR response to interrogatory no. 5 was anything other than an unqualified "no",
11 IDENTIFY ALL PERSONS who have knowledge or information that supports or otherwise
12 relates to YOUR contention.

13 INTERROGATORY NO. 35:

14 State in complete detail all facts that support YOUR contention that "Defendant
15 GENERAL MOTORS CORPORATION, was, and is...guilty of despicable conduct" as alleged
16 in paragraph 21 of YOUR COMPLAINT?

17 INTERROGATORY NO. 36:

18 IDENTIFY ALL DOCUMENTS or tangible things that support or otherwise relate to
19 YOUR contention that "Defendant GENERAL MOTORS CORPORATION, was, and is...guilty
20 of despicable conduct" as alleged in paragraph 21 of YOUR COMPLAINT.

21 INTERROGATORY NO. 37:

22 IDENTIFY ALL PERSONS who have knowledge or information that supports or
23 otherwise relates to YOUR contention that "Defendant GENERAL MOTORS CORPORATION,
24 was, and is...guilty of despicable conduct" as alleged in paragraph 21 of YOUR COMPLAINT.

25 INTERROGATORY NO. 38:

26 State in complete detail all facts that support YOUR contention that "Defendant...carried
27 on...with a willful and conscious disregard of the rights and safety of others, including the
28 consuming public and more specifically, minor plaintiff, JERROD HUNTER..." as alleged in

1 paragraph 21 of YOUR COMPLAINT.

2 INTERROGATORY NO. 39:

3 IDENTIFY ALL DOCUMENTS or tangible things that support or otherwise relate to
4 YOUR contention that "Defendant...carried on...with a willful and conscious disregard of the
5 rights and safety of others, including the consuming public and more specifically, minor plaintiff,
6 JERROD HUNTER..." as alleged in paragraph 21 of YOUR COMPLAINT.

7 INTERROGATORY NO. 40:

8 IDENTIFY ALL PERSONS who have knowledge or information that supports or
9 otherwise relates to YOUR contention that "Defendant...carried on...with a willful and conscious
10 disregard of the rights and safety of others, including the consuming public and more specifically,
11 minor plaintiff, JERROD HUNTER..." as alleged in paragraph 21 of YOUR COMPLAINT.

12 INTERROGATORY NO. 41:

13 State in complete detail all facts that support YOUR contention that "GENERAL
14 MOTORS has known of the propensity of the seatbelt type worn by plaintiff, JERROD
15 HUNTER, to unlatch due to inertial forces during an accident since the early 1960's" as alleged
16 in paragraph 21a of YOUR COMPLAINT.

17 INTERROGATORY NO. 42:

18 IDENTIFY ALL DOCUMENTS or tangible things that support or otherwise relate to
19 YOUR contention that GENERAL MOTORS has known of the propensity of the seatbelt type
20 worn by plaintiff, JERROD HUNTER, to unlatch due to inertial forces during an accident since
21 the early 1960's" as alleged in paragraph 21a of YOUR COMPLAINT.

22 INTERROGATORY NO. 43:

23 IDENTIFY ALL PERSONS who have knowledge or information that supports or
24 otherwise relates to YOUR contention that "GENERAL MOTORS has known of the propensity
25 of the seatbelt type worn by plaintiff, JERROD HUNTER, to unlatch due to inertial forces during
26 an accident since the early 1960's" as alleged in paragraph 21a of YOUR COMPLAINT.

27 INTERROGATORY NO. 44:

28 State in complete detail all facts that support YOUR contention that "[i]n concert with

1 other auto makers...GENERAL MOTORS investigated...the phenomenon known as inertial
2 release or inertial unlatching of seatbelt buckles, and determined through its investigation that
3 inertial release or inertial unlatching of seatbelt buckles could occur and did occur while such
4 buckles were in use by consumers...and more specifically during accidents occurring to and
5 involving consumers and users of these buckles..." as alleged in paragraph 21b of YOUR
6 COMPLAINT.

7 INTERROGATORY NO. 45

8 IDENTIFY ALL DOCUMENTS or tangible things that support or otherwise relate to
9 YOUR contention that "[i]n concert with other auto makers...GENERAL MOTORS
10 investigated...the phenomenon known as inertial release or inertial unlatching of seatbelt buckles,
11 and determined through its investigation that inertial release or inertial unlatching of seatbelt
12 buckles could occur and did occur while such buckles were in use by consumers...and more
13 specifically during accidents occurring to and involving consumers and users of these buckles..."
14 as alleged in paragraph 21b of YOUR COMPLAINT.

15 INTERROGATORY NO. 46:

16 IDENTIFY ALL PERSONS who have knowledge or information that supports or
17 otherwise relates to YOUR contention that "[i]n concert with other auto makers...GENERAL
18 MOTORS investigated...the phenomenon known as inertial release or inertial unlatching of
19 seatbelt buckles, and determined through its investigation that inertial release or inertial
20 unlatching of seatbelt buckles could occur and did occur while such buckles were in use by
21 consumers...and more specifically during accidents occurring to and involving consumers and
22 users of these buckles..." as alleged in paragraph 21b of YOUR COMPLAINT.

23 INTERROGATORY NO. 47:

24 State in complete detail all facts that support YOUR contention that "[t]he National
25 Highway Traffic Safety Administration (NHTSA) in the late 60's attempted to outlaw the push
26 button seatbelt buckle, including the subject buckle, due to its known risk of catastrophic
27 failure..." as alleged in paragraph 21c of YOUR COMPLAINT.

28 ///

1 INTERROGATORY NO. 48:

2 IDENTIFY ALL DOCUMENTS or tangible things that support or otherwise relate to
3 YOUR contention that “[t]he National Highway Traffic Safety Administration (NHTSA) in the
4 late 60’s attempted to outlaw the push button seatbelt buckle, including the subject buckle, due to
5 its known risk of catastrophic failure...” as alleged in paragraph 21c of YOUR COMPLAINT.

6 INTERROGATORY NO. 49:

7 IDENTIFY ALL PERSONS who have knowledge or information that supports or
8 otherwise relates to YOUR contention that “[t]he National Highway Traffic Safety
9 Administration (NHTSA) in the late 60’s attempted to outlaw the push button seatbelt buckle,
10 including the subject buckle, due to its known risk of catastrophic failure...” as alleged in
11 paragraph 21c of YOUR COMPLAINT.

12 INTERROGATORY NO. 50:

13 State in complete detail all facts that support YOUR contention that “GENERAL
14 MOTORS undertook... prior to 1970, to design... and to produce seatbelt buckles, which could
15 replace the buckles, and which were not prone to inertial unlatching and inertial release during
16 accidents...” as alleged in paragraph 21d of YOUR COMPLAINT.

17 INTERROGATORY NO. 51:

18 IDENTIFY ALL DOCUMENTS or tangible things that support or otherwise relate to
19 YOUR contention that “GENERAL MOTORS undertook... prior to 1970, to design... and to
20 produce seatbelt buckles, which could replace the buckles, and which were not prone to inertial
21 unlatching and inertial release during accidents...” as alleged in paragraph 21d of YOUR
22 COMPLAINT.

23 INTERROGATORY NO. 52:

24 IDENTIFY ALL PERSONS who have knowledge or information that supports or
25 otherwise relates to YOUR contention that “GENERAL MOTORS undertook... prior to 1970, to
26 design... and to produce seatbelt buckles, which could replace the buckles, and which were not
27 prone to inertial unlatching and inertial release during accidents...” as alleged in paragraph 21d of
28 YOUR COMPLAINT.

1 INTERROGATORY NO. 53:

2 State in complete detail all facts that support YOUR contention that “Despite its
3 knowledge...GENERAL MOTORS... has adopted, and strictly adhered to, a corporate policy and
4 practice...whereby GENERAL MOTORS...have denied repeatedly and unequivocally that
5 inertial release or inertial unlatching of the subject buckles can occur during real world accident
6 circumstances...” as alleged in paragraph 21e of YOUR COMPLAINT.

7 INTERROGATORY NO. 54:

8 IDENTIFY ALL DOCUMENTS or tangible things that support or otherwise relate to
9 YOUR contention that “Despite its knowledge...GENERAL MOTORS... has adopted, and
10 strictly adhered to, a corporate policy and practice...whereby GENERAL MOTORS...have
11 denied repeatedly and unequivocally that inertial release or inertial unlatching of the subject
12 buckles can occur during real world accident circumstances...” as alleged in paragraph 21e of
13 YOUR COMPLAINT.

14 INTERROGATORY NO. 55:

15 IDENTIFY ALL PERSONS who have knowledge or information that supports or
16 otherwise relates to YOUR contention that “Despite its knowledge...GENERAL MOTORS...
17 has adopted, and strictly adhered to, a corporate policy and practice...whereby GENERAL
18 MOTORS...have denied repeatedly and unequivocally that inertial release or inertial unlatching
19 of the subject buckles can occur during real world accident circumstances...” as alleged in
20 paragraph 21e of YOUR COMPLAINT.

21 INTERROGATORY NO. 56:

22 State in complete detail all facts that support YOUR contention that “[d]espite its
23 unequivocal and longstanding knowledge that inertial unlatching does occur in real world
24 accidents involving the buckle, GENERAL MOTORS has repeatedly advised the
25 government...that inertial unlatching of seatbelts does not occur in real world accidents...” as
26 alleged in paragraph 21f of YOUR COMPLAINT.

27 ///

28 ///

1 INTERROGATORY NO. 57:

2 IDENTIFY ALL DOCUMENTS or tangible things that support or otherwise relate to
3 YOUR contention that “[d]espite its unequivocal and longstanding knowledge that inertial
4 unlatching does occur in real world accidents involving the buckle, GENERAL MOTORS has
5 repeatedly advised the government...that inertial unlatching of seatbelts does not occur in real
6 world accidents...” as alleged in paragraph 21f of YOUR COMPLAINT.

7 INTERROGATORY NO. 58:

8 IDENTIFY ALL PERSONS who have knowledge or information that supports or
9 otherwise relates to YOUR contention that “[d]espite its unequivocal and longstanding
10 knowledge that inertial unlatching does occur in real world accidents involving the buckle,
11 GENERAL MOTORS has repeatedly advised the government...that inertial unlatching of
12 seatbelts does not occur in real world accidents...” as alleged in paragraph 21f of YOUR
13 COMPLAINT.

14 INTERROGATORY NO. 59:

15 State in complete detail all facts that support YOUR contention that “...GENERAL
16 MOTORS did not provide a full, comprehensive and truthful response to NHSA of its knowledge
17 and full awareness regarding the happening of inertial unlatching during real world accidents
18 involving the buckle and during crash and sled testing by...GENERAL MOTORS...” as alleged
19 in paragraph 21g of YOUR COMPLAINT.

20 INTERROGATORY NO. 60:

21 IDENTIFY ALL DOCUMENTS or tangible things that support or otherwise relate to
22 YOUR contention that “...GENERAL MOTORS did not provide a full, comprehensive and
23 truthful response to NHSA of its knowledge and full awareness regarding the happening of
24 inertial unlatching during real world accidents involving the buckle and during crash and sled
25 testing by...GENERAL MOTORS...” as alleged in paragraph 21g of YOUR COMPLAINT.

26 INTERROGATORY NO. 61:

27 IDENTIFY ALL PERSONS who have knowledge or information that supports or
28 otherwise relates to YOUR contention that “...GENERAL MOTORS did not provide a full,

1 comprehensive and truthful response to NHTSA of its knowledge and full awareness regarding the
2 happening of inertial unlatching during real world accidents involving the buckle and during
3 crash and sled testing by...GENERAL MOTORS..." as alleged in paragraph 21g of YOUR
4 COMPLAINT.

5 INTERROGATORY NO. 62:

6 State in complete detail all facts that support YOUR contention that "G.M. failed to
7 provide critical test data in an effort to influence or manipulate the investigation of inertial
8 unlatching by the federal government..." as alleged in paragraph 21g of YOUR COMPLAINT.

9 INTERROGATORY NO. 63:

10 IDENTIFY ALL DOCUMENTS or tangible things that support or otherwise relate to
11 YOUR contention that "G.M. failed to provide critical test data in an effort to influence or
12 manipulate the investigation of inertial unlatching by the federal government..." as alleged in
13 paragraph 21g of YOUR COMPLAINT.

14 INTERROGATORY NO. 64:

15 IDENTIFY ALL PERSONS who have knowledge or information that supports or
16 otherwise relates to YOUR contention "G.M. failed to provide critical test data in an effort to
17 influence or manipulate the investigation of inertial unlatching by the federal government..." as
18 alleged in paragraph 21g of YOUR COMPLAINT.

19 INTERROGATORY NO. 65:

20 State in complete detail all facts that support YOUR contention that "...the stonewalling
21 and deceitful policy of GENERAL MOTOR with regard to its knowledge of inertial
22 unlatching...was...approved by officials at the highest level of GENERAL MOTORS..." as
23 alleged in paragraph 21h of YOUR COMPLAINT.

24 INTERROGATORY NO. 66:

25 IDENTIFY ALL DOCUMENTS or tangible things that support or otherwise relate to
26 YOUR contention that "...the stonewalling and deceitful policy of GENERAL MOTOR with
27 regard to its knowledge of inertial unlatching...was...approved by officials at the highest level of
28 GENERAL MOTORS..." as alleged in paragraph 21h of YOUR COMPLAINT.

1 INTERROGATORY NO. 67:

2 IDENTIFY ALL PERSONS who have knowledge or information that supports or
3 otherwise relates to YOUR contention that "...the stonewalling and deceitful policy of
4 GENERAL MOTOR with regard to its knowledge of inertial unlatching...was...approved by
5 officials at the highest level of GENERAL MOTORS..." as alleged in paragraph 21h of YOUR
6 COMPLAINT.

7 INTERROGATORY NO. 68:

8 State in complete detail all facts that support YOUR contention that "...this policy of
9 repeated denial that inertial unlatching can and does occur in real world traffic accidents was a
10 policy decided upon in concert with and in order to be consistent with FORD MOTOR
11 COMPANY..." as alleged in paragraph 21h of YOUR COMPLAINT.

12 INTERROGATORY NO. 69:

13 IDENTIFY ALL DOCUMENTS or tangible things that support or otherwise relate to
14 YOUR contention that "...this policy of repeated denial that inertial unlatching can and does
15 occur in real world traffic accidents was a policy decided upon in concert with and in order to be
16 consistent with FORD MOTOR COMPANY..." as alleged in paragraph 21h of YOUR
17 COMPLAINT.

18 INTERROGATORY NO. 70:

19 IDENTIFY ALL PERSONS who have knowledge or information that supports or
20 otherwise relates to YOUR contention that "...this policy of repeated denial that inertial
21 unlatching can and does occur in real world traffic accidents was a policy decided upon in concert
22 with and in order to be consistent with FORD MOTOR COMPANY..." as alleged in paragraph
23 21h of YOUR COMPLAINT.

24 INTERROGATORY NO. 71:

25 State in complete detail all facts that support YOUR contention that "...GENERAL
26 MOTORS CORPORATION, knew that inertial unlatching was continuing to occur in real world
27 traffic collisions, and that in many of those collisions, the unlatching or release of the seatbelt
28 directly caused catastrophic injuries or death under circumstances where the user would not have

1 suffered any significant injury if the seatbelt buckle had not been unlatched...” as alleged in
2 paragraph 21i of YOUR COMPLAINT.

3 INTERROGATORY NO. 72:

4 IDENTIFY ALL DOCUMENTS or tangible things that support or otherwise relate to
5 YOUR contention that “...GENERAL MOTORS CORPORATION, knew that inertial unlatching
6 was continuing to occur in real world traffic collisions, and that in many of those collisions, the
7 unlatching or release of the seatbelt directly caused catastrophic injuries or death under
8 circumstances where the user would not have suffered any significant injury if the seatbelt buckle
9 had not been unlatched...” as alleged in paragraph 21i of YOUR COMPLAINT.

10 INTERROGATORY NO. 73:

11 IDENTIFY ALL PERSONS who have knowledge or information that supports or
12 otherwise relates to YOUR contention that “...GENERAL MOTORS CORPORATION, knew
13 that inertial unlatching was continuing to occur in real world traffic collisions, and that in many of
14 those collisions, the unlatching or release of the seatbelt directly caused catastrophic injuries or
15 death under circumstances where the user would not have suffered any significant injury if the
16 seatbelt buckle had not been unlatched...” as alleged in paragraph 21i of YOUR COMPLAINT.

17 INTERROGATORY NO. 74:

18 State in complete detail all facts that support YOUR contention that “[i]n the early 1970’s
19 at the latest, GENERAL MOTORS had available to it designs of seatbelt buckles that could have
20 been produced to replace the buckle, and which would have been resistant to inertial unlatching
21 and would not have presented any additional risks or hazards...” as alleged in paragraph 21j of
22 YOUR COMPLAINT.

23 INTERROGATORY NO. 75:

24 IDENTIFY ALL DOCUMENTS or tangible things that support or otherwise relate to
25 YOUR contention that “[i]n the early 1970’s at the latest, GENERAL MOTORS had available to
26 it designs of seatbelt buckles that could have been produced to replace the buckle, and which
27 would have been resistant to inertial unlatching and would not have presented any additional risks
28 or hazards...” as alleged in paragraph 21j of YOUR COMPLAINT.

1 INTERROGATORY NO. 76:

2 IDENTIFY ALL PERSONS who have knowledge or information that supports or
3 otherwise relates to YOUR contention that “[i]n the early 1970’s at the latest, GENERAL
4 MOTORS had available to it designs of seatbelt buckles that could have been produced to replace
5 the buckle, and which would have been resistant to inertial unlatching and would not have
6 presented any additional risks or hazards...” as alleged in paragraph 21j of YOUR COMPLAINT.

7 INTERROGATORY NO. 77:

8 State in complete detail all facts that support YOUR contention that “...each of the
9 alternative buckle designs that could have been used...to replace the buckle would have resulted
10 in some additional per unit cost to GENERAL MOTORS, and that this additional cost was a
11 factor in GENERAL MOTORS’ continuing decision not to replace the subject buckle in its
12 vehicles...” as alleged in paragraph 21j of YOUR COMPLAINT.

13 INTERROGATORY NO. 78:

14 IDENTIFY ALL DOCUMENTS or tangible things that support or otherwise relate to
15 YOUR contention that “...each of the alternative buckle designs that could have been used...to
16 replace the buckle would have resulted in some additional per unit cost to GENERAL MOTORS,
17 and that this additional cost was a factor in GENERAL MOTORS’ continuing decision not to
18 replace the subject buckle in its vehicles...” as alleged in paragraph 21j of YOUR COMPLAINT.

19 INTERROGATORY NO. 79:

20 IDENTIFY ALL PERSONS who have knowledge or information that supports or
21 otherwise relates to YOUR contention that “...each of the alternative buckle designs that could
22 have been used...to replace the buckle would have resulted in some additional per unit cost to
23 GENERAL MOTORS, and that this additional cost was a factor in GENERAL MOTORS’
24 continuing decision not to replace the subject buckle in its vehicles...” as alleged in paragraph 21j
25 of YOUR COMPLAINT.

26 INTERROGATORY NO. 80:

27 State in complete detail all facts that support YOUR contention that “...GENERAL
28 MOTORS was aware and continues to be aware that as early as the late 1950s, and continuing to

1 present, United States patents have been applied for and issued to automakers or automotive
2 industry vendors for seatbelt buckles designed to prevent inertial unlatching due to forces
3 experienced by the buckle in a real world accident..." as alleged in paragraph 21k of YOUR
4 COMPLAINT.

5 INTERROGATORY NO. 81

6 IDENTIFY ALL DOCUMENTS or tangible things that support or otherwise relate to
7 YOUR contention that "...GENERAL MOTORS was aware and continues to be aware that as
8 early as the late 1950s, and continuing to present, United States patents have been applied for and
9 issued to automakers or automotive industry vendors for seatbelt buckles designed to prevent
10 inertial unlatching due to forces experienced by the buckle in a real world accident..." as alleged
11 in paragraph 21k of YOUR COMPLAINT.

12 INTERROGATORY NO. 82:

13 IDENTIFY ALL PERSONS who have knowledge or information that supports or
14 otherwise relates to YOUR contention that "...GENERAL MOTORS was aware and continues to
15 be aware that as early as the late 1950s, and continuing to present, United States patents have
16 been applied for and issued to automakers or automotive industry vendors for seatbelt buckles
17 designed to prevent inertial unlatching due to forces experienced by the buckle in a real world
18 accident..." as alleged in paragraph 21k of YOUR COMPLAINT.

19 INTERROGATORY NO. 83:

20 State in complete detail all facts that support YOUR contention that "...an additional
21 motivation to GENERAL MOTORS in its decision not to acknowledge the existence of inertial
22 unlatching in real world accidents, and its refusal to replace the subject buckle with alternative
23 buckle designs, was the desire to avoid potential product liability exposure..." as alleged in
24 paragraph 21l of YOUR COMPLAINT.

25 INTERROGATORY NO. 84:

26 IDENTIFY ALL DOCUMENTS or tangible things that support or otherwise relate to
27 YOUR contention that "...an additional motivation to GENERAL MOTORS in its decision not to
28 acknowledge the existence of inertial unlatching in real world accidents, and its refusal to replace

1 the subject buckle with alternative buckle designs, was the desire to avoid potential product
2 liability exposure...” as alleged in paragraph 211 of YOUR COMPLAINT.

3 INTERROGATORY NO. 85:

4 IDENTIFY ALL PERSONS who have knowledge or information that supports or
5 otherwise relates to YOUR contention that “...an additional motivation to GENERAL MOTORS
6 in its decision not to acknowledge the existence of inertial unlatching in real world accidents, and
7 its refusal to replace the subject buckle with alternative buckle designs, was the desire to avoid
8 potential product liability exposure...” as alleged in paragraph 211 of YOUR COMPLAINT.

9 INTERROGATORY NO. 86:

10 State in complete detail all facts that support YOUR contention that “[a]t no time to the
11 present has GENERAL MOTORS...admitted or acknowledged that inertial unlatching has been
12 known to occur...despite its knowledge of the truth of this proposition...” as alleged in paragraph
13 21m of YOUR COMPLAINT.

14 INTERROGATORY NO. 87:

15 IDENTIFY ALL DOCUMENTS or tangible things that support or otherwise relate to
16 YOUR contention that that “[a]t no time to the present has GENERAL MOTORS...admitted or
17 acknowledged that inertial unlatching has been known to occur...despite its knowledge of the
18 truth of this proposition...” as alleged in paragraph 21m of YOUR COMPLAINT.

19 INTERROGATORY NO. 88:

20 IDENTIFY ALL PERSONS who have knowledge or information that supports or
21 otherwise relates to YOUR contention that that “[a]t no time to the present has GENERAL
22 MOTORS...admitted or acknowledged that inertial unlatching has been known to occur...despite
23 its knowledge of the truth of this proposition...” as alleged in paragraph 21m of YOUR
24 COMPLAINT.

25 INTERROGATORY NO. 89:

26 State in complete detail all facts that support YOUR contention that “...GENERAL
27 MOTORS continues to this date to stonewall and deny and to expend enormous sums of
28 money...to repeat over and over the untrue assertions...” as alleged in paragraph 21m of YOUR

1 COMPLAINT.

2 INTERROGATORY NO. 90:

3 IDENTIFY ALL DOCUMENTS or tangible things that support or otherwise relate to
4 YOUR contention that that "...GENERAL MOTORS continues to this date to stonewall and deny
5 and to expend enormous sums of money...to repeat over and over the untrue assertions..." as
6 alleged in paragraph 21m of YOUR COMPLAINT.

7 INTERROGATORY NO. 91:

8 IDENTIFY ALL PERSONS who have knowledge or information that supports or
9 otherwise relates to YOUR contention that that "...GENERAL MOTORS continues to this date
10 to stonewall and deny and to expend enormous sums of money...to repeat over and over the
11 untrue assertions..." as alleged in paragraph 21m of YOUR COMPLAINT.

12 INTERROGATORY NO. 92:

13 State in complete detail all facts that support YOUR contention that "...the conduct of
14 GENERAL MOTORS...has constituted and continues to constitute a fraud upon the consuming
15 public... and a fraud and deceit upon those offices and officials...with the responsibility of
16 overseeing the safety of motor vehicles on the highways of the United States..." as alleged in
17 paragraph 21n of YOUR COMPLAINT.

18 INTERROGATORY NO. 93:

19 IDENTIFY ALL DOCUMENTS or tangible things that support or otherwise relate to
20 YOUR contention that "...the conduct of GENERAL MOTORS...has constituted and continues
21 to constitute a fraud upon the consuming public... and a fraud and deceit upon those offices and
22 officials...with the responsibility of overseeing the safety of motor vehicles on the highways of
23 the United States..." as alleged in paragraph 21n of YOUR COMPLAINT.

24 INTERROGATORY NO. 94:

25 IDENTIFY ALL PERSONS who have knowledge or information that supports or
26 otherwise relates to YOUR contention that "...the conduct of GENERAL MOTORS...has
27 constituted and continues to constitute a fraud upon the consuming public... and a fraud and
28 deceit upon those offices and officials...with the responsibility of overseeing the safety of motor

1 vehicles on the highways of the United States...” as alleged in paragraph 21n of YOUR
2 COMPLAINT.

3 INTERROGATORY NO. 95:

4 State in complete detail all facts that support YOUR contention that “...the actions and
5 omissions of GENERAL MOTORS...constitute truly despicable and outrageous conduct...” as
6 alleged in paragraph 22 of YOUR COMPLAINT.

7 INTERROGATORY NO. 96:

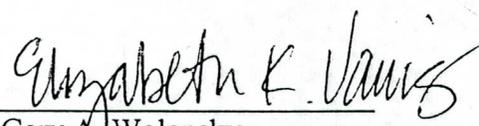
8 IDENTIFY ALL DOCUMENTS or tangible things that support or otherwise relate to
9 YOUR contention that “...the actions and omissions of GENERAL MOTORS...constitute truly
10 despicable and outrageous conduct...” as alleged in paragraph 22 of YOUR COMPLAINT.

11 INTERROGATORY NO. 97:

12 IDENTIFY ALL PERSONS who have knowledge or information that supports or
13 otherwise relates to YOUR contention that “...the actions and omissions of GENERAL
14 MOTORS...constitute truly despicable and outrageous conduct...” as alleged in paragraph 22 of
15 YOUR COMPLAINT.

16 DATED: May 5, 1999

SNELL & WILMER L.L.P.

17
18 By: 

19 Gary A. Wolensky
20 Ellen L. Darling
21 Elizabeth K. Vanis
22 Attorneys for Defendants
23 GENERAL MOTORS CORPORATION
24
25
26
27
28

DECLARATION OF ELIZABETH K. VANIS
FOR ADDITIONAL DISCOVERY

I, Elizabeth K. Vanis, declare:

1. I am an attorney at law duly licensed to practice before all of the courts of the state of California and am employed by Snell & Wilmer, attorneys of record for defendant General Motors Corporation, a party to this action.

2. I am propounding to plaintiff Jerrod Hunter the attached set of special interrogatories.

3. This set of interrogatories will cause the total number of specially prepared interrogatories propounded to the party to whom they are directed to exceed the number of specially prepared interrogatories permitted by paragraph (1) of subdivision (c) of Section 2030 of the Code of Civil Procedure.

4. This set of interrogatories contains a total of 71 specially prepared interrogatories. General Motors previously served plaintiff with 26 special interrogatories.

5. I am familiar with the issues and the previous discovery conducted by all of the parties in the case and have personally examined each of the questions in this set of interrogatories.

6. This number of questions is warranted under paragraph (2) of subdivision (c) of Section 2030 of the Code of Civil Procedure because plaintiff has alleged complex product liability claims and has just amended his complaint to allege a detailed claim for punitive and exemplary damages. These specific interrogatories will identify the bases for plaintiff's claims for punitive and exemplary damages against General Motors.

///

///

///

///

///

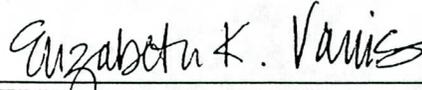
///

///

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

7. None of the questions in this set of interrogatories is being propounded for any improper purpose, such as to harass the party, or the attorney for the party, to whom it is directed, or to cause unnecessary delay or needless increase in the cost of litigation.

I declare under penalty of perjury under the laws of California that the foregoing is true and correct, executed this 5th day of May, 2000, at Irvine, California.



ELIZABETH K. VANIS

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

PROOF OF SERVICE BY ALL OPTIONS

I am employed in the County of Orange, State of California. I am over the age of 18 and not a party to the within action; my business address is 1920 Main Street, Suite 1200, Irvine, CA 92614-7060.

On May 5, 2000, I served, in the manner indicated below, the foregoing document described as **GENERAL MOTORS CORPORATION'S SPECIAL INTERROGATORIES, SET TWO, TO PLAINTIFF JERROD HUNTER** on the interested parties in this action by placing true copies thereof, enclosed in sealed envelopes, at Irvine, addressed as follows:

JAMES P. CARR
11755 Wilshire Blvd., Suite 1170
Los Angeles, CA 90025-1543
(310) 444-7179
(310) 473-0708 FAX

BY REGULAR MAIL: I caused such envelopes to be deposited in the United States mail at Irvine, California, with postage thereon fully prepaid. I am readily familiar with the firm's practice of collection and processing correspondence for mailing. It is deposited with the United States Postal Service each day and that practice was followed in the ordinary course of business for the service herein attested to (C.C.P. § 1013(a)).

BY FACSIMILE: (C.C.P. § 1013(e)(f)).

BY FEDERAL EXPRESS: I caused such envelopes to be delivered by air courier, with next day service, to the offices of the addressees. (C.C.P. § 1013(c)(d)).

BY PERSONAL SERVICE: I caused such envelopes to be delivered by hand to the offices of the addressees. (C.C.P. § 1011(a)(b)).

I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

Executed on May 5, 2000, at Irvine, California.


SHARON N. BOSS

Snell & Wilmer
LLP
LAW OFFICES
1920 Main Street, Suite 1200
Irvine, California 92614-7060
(949) 253-2700