

Exhibit C

Kane Legal Motor Vehicle Product Defect Handbook

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Section 1 – Auto Defects

While many auto accidents occur because of human error, many also can be caused or worsened by defective products or inadequate safety mechanisms.

Among these problems are vehicles that are prone to **rollovers**, especially increasingly popular sport utility vehicles, or SUVs. Rollover accidents are responsible for an estimated 24,000 injuries and 10,000 deaths annually in the United States.

A number of the vehicles have also been found to have roofs that cannot withstand rollover accidents, with drivers and passengers injured and killed. Federal officials, seeking to reduce the number of so-called roof crush accidents, have proposed toughening the current 30-year-old standard to mandate stronger auto roofs.

Airbags can cause severe injuries in auto accidents. Sometimes the devices deploy when they should not, or open with too much force or too slowly. In some cases airbags fail to deploy at all to protect drivers and passengers.

Other devices have also caused injury and death, such as **lap belts** found in older vehicles and **defective parking brakes**.

In some cases it is the type of vehicle itself that can be problematic. For instance, **motorcycles and scooters** have increased in popularity in recent years and traffic accidents involving the two wheelers has risen with sales. The number of motorcycle riders killed on U.S roadways reached 5,154 in 2007, an all-time high.

Tractor trailers, large trucks and buses are involved in accidents that account for roughly 5,000 fatalities each year in the United States. **Fifteen-passenger vans** often used by daycare centers, business commuters, sports teams, senior citizen groups and others are also considered dangerous because they are prone to rollovers.

Also, **school bus accidents** account for an average 17,000 emergency-room injuries and 20 deaths each year in the United States.

Kane Legal has many attorneys, including a team of several doctors, to help evaluate potential lawsuits. Contact an **auto accident lawyer** today.

Section 2 – SUVs and Passenger Vans

Roughly 10,000 people are killed each year in rollover accidents and many more suffer catastrophic injuries, including brain injuries and spinal cord injuries.

A significant number of these rollovers are caused by the vehicles themselves. In particular, sport utility vehicles, or SUVs, are more susceptible to rollover accidents because they are top heavy – they have a higher center of gravity. Ford Motor Co. in November 2007 agreed to settle a class-action lawsuit by some one million people claiming that its Explorer SUV was prone to rollovers.

Rollovers are extremely dangerous and have a greater fatality rate than other types of car and truck crashes. While only a small number of all accidents involve rollovers – a mere 3 percent – rollovers account for fully one-third of all deaths involving passenger vehicles.

Many of the fatalities involve roof crush, rollovers in which the roof-strength of a vehicle cannot withstand the force of the crash. In one case, in October 2005, a jury awarded \$30.4 million in the death of a teenager whose family claimed the roof of their pickup truck failed to provide ample protection in a rollover accident.

If you or someone you know was seriously injured or killed in a rollover or roof crush accident, you may want to **contact a rollover attorney** for a free evaluation of your case.

SUVs are more prone to roof crushes, which occur in many rollovers. An SUV roof is more likely to crush because the vehicles are higher and the roofs often impact the ground with more force than passenger cars.

While organizations such as the National Highway Traffic Safety Administration have proposed more stringent standards for vehicle roofs, the government has yet to mandate such requirements and many cars are manufactured with roof standards that have not been changed or improved in more than three decades.

In the meantime, autos prone to rollovers, such as the SUV, continue to increase in popularity – and rollover injuries and deaths with them. Rollovers account for more than 200,000 injuries annually in the United States, including 10,000 fatalities.

For more information, the National Highway Traffic Safety Administration provides rollover safety ratings for various makes and models of vehicles at www.safercar.gov.

And it isn't only cars, vans and trucks that are involved in rollovers. People, sometimes children, have also suffered severe injuries while riding all-terrain vehicles, or ATVs, that have rolled over. Kane Legal, with some 30 experienced attorneys, several of whom are also highly regarded doctors, is one of the nation's leading law firms with the ability to litigate rollover accident cases. We have successfully litigated both rollover and ATV cases for catastrophically injured clients. Click here to **contact a rollover lawyer** today.

Section 3 – Defective Airbags

At Kane Legal we hold manufacturers accountable for their unsafe and defective products. Individuals injured by unreasonably dangerous products deserve financial compensation. Our attorneys work to collect the monetary damages owed to you.

Automobile airbags can sometimes cause severe injuries and even death.

Even though airbags have been credited with saving lives, these devices have problems, including the following:

- Airbags that deploy when they should not.
- Airbags that deploy with too much force.
- Airbags that deploy too slowly.
- Airbags that deploy in low-speed accidents.

- Airbags that fail to deploy.

If you or someone you know suffered a severe airbag injury or death, you may want to contact an airbag attorney for a free evaluation of your case.

Because airbags must inflate very rapidly to be effective – generally at speeds greater than 100 m.p.h. – they are thrust from the steering wheel or dashboard with terrific force. That force may result in injury, often merely burns or bruises, but sometimes severe injuries such as ruptured eyeballs and blindness, or even death. Victims are often children or smaller passengers.

And in some of these cases it is the airbag or related devices such as sensors that are at fault. A number of vehicles have been recalled because of air bag problems and some victims have successfully sued auto manufacturers for their injuries.

In one well-publicized airbag trial, a jury in November 2003 found Ford Motor Co. negligent and awarded \$3.3 million in the case of a woman who suffered fatal chest injuries when the airbag in her Ford Taurus deployed in a low speed (9 m.p.h.) accident. The woman was 5-foot-9 and had been wearing a seat belt.

General Motors in late 2000 recalled 224,000 Cadillac Devilles to replace side-impact sensing modules considered faulty, with the possibility they could cause airbags to suddenly deploy or no reason or to fail to deploy at all.

In 2001, Daimler Chrysler recalled 216,000 pickup trucks because of problems with driver-side airbags. NHTSA said that some of the trucks contained material inside steering wheels that could cause the driver's side airbag to become disabled.

Ford Motor Co. in 2003 said it would recall more than 43,000 Lincoln Continentals (model years 1999 and 2000) because airbags might have deployed inadvertently in the cars. Federal officials said some of the airbags were triggered by gravel or debris hitting underbody sensors.

In the same year, after a lengthy investigation, Nissan agreed to replace airbags in certain 1994 and 1995 Altima models after a reported 37 people suffered eye injuries when the airbags deployed, with two passengers suffering permanent blindness.

Hyundai Motor Co. recalled 240,000 Elantra sedans in September 2005 because of airbag problems. In that case, the problem was a computer on the passenger side that could mistake a child restraint seat as an adult, potentially causing harm to a baby. (The computer miscalculation was thought to occur when the child seat was placed on the passenger side after an adult had occupied the seat.) Later in the same month, NHTSA called for 73,000 Kia LD Spectras to be recalled for the same problem.

Honda Motor Co. recalled 85,000 2005 model minivans when it was found that water could leak into external sensors and cause corrosion, resulting in late deployment or failure of the front airbags to deploy in an accident.

Kane Legal, with many experienced attorneys, several of whom are also highly regarded doctors, is one of the nation's leading law firms with the ability to litigate auto accident and airbag cases.

Section 4 – Lap Belts

Automobile lap belts are dangerous. Not only can they fail to provide ample protection in the event of an accident, but the older variety seat belts can actually be the cause of severe and fatal injuries.

Studies have shown that in some instances lap belts were more dangerous than if an accident victim had been wearing no seat belt at all.

The problem with lap belts is that in the event of an accident, particularly a frontal collision, the belts can focus the impact of the crash to a person's mid-section, causing serious abdominal and spinal cord injury. Such traumatic injuries have resulted in paraplegia, quadriplegia, facial fractures, head injuries, and even death. Most vulnerable in these cases are smaller passengers, generally children and adolescents.

The newer lap-shoulder belts, or three-point belts, have proven to be much more effective in preventing injuries. Unfortunately, those belts were not required for years as standard equipment in many cars, most notably in the rear center seating section – and still aren't mandated for all cars until 2007 models.

Kane Legal, a firm with many experienced lawyers, several of whom are also doctors, has successfully litigated lap belt lawsuits. If you or someone you know suffered a severe injury or death as the result of a lap belt injury, you may want to contact a seat belt attorney for a free evaluation of your case.

Lap belts were long thought to be hazardous, but the first highly publicized definitive proof came in a 1986 report by the National Transportation Safety Board, an independent federal agency that had initially sought to investigate the effectiveness of seat belts in general but soon focused its attention on lap belts.

The study found that in accidents involving 50 people who wore lap belts, 26 sustained serious to fatal injuries in crashes in which other occupants – wearing three-point belts or no belts at all – were less seriously injured or had walked away uninjured. Among all those involved in the auto accidents studied, 13 of the people who wore lap belts were killed, while only four people (out of 57) who were unrestrained died and only one (of 32) who was wearing a combination lap-shoulder belt died.

The NTSB concluded: "In many cases, the lap belts induced severe to fatal injuries that probably would not have occurred if the lap belts had not been worn."

Shoulder belts were introduced in the early 1960s by Volvo but were not a requirement for autos sold in the United States until 1972, and then only for the front seats. Lap-shoulder belts were not required for rear seats until 1989 for all new cars and not until 1991 for all light trucks – and then only for the outside rear seats, not the rear center seat. All cars will be required to have the three-point seat belts in the middle rear seats by 2007.

Yet that requirement pertains only to new cars and there will still be millions of cars on the road that will still have the dangerous lap belts in the center rear seat, where children and other smaller passengers often sit.

Section 5 – Defective Parking Brake

At Kane Legal we hold manufacturers accountable for their unsafe and defective products. Individuals injured by unreasonably dangerous products deserve financial compensation. Our attorneys work to collect the monetary damages owed to you.

Cars and trucks often contain manufacturing defects that result in necessary repairs, recalls and, in some instances, serious injuries to drivers or auto occupants.

Among these problems have been defective parking brakes. In one Pennsylvania case, a baby was run over by a Ford pickup truck after the parking brake failed and the vehicle rolled over the infant's head. In another case, this one in Nevada, a three-year-old boy was killed when the parking brake of another Ford pickup suddenly disengaged and the vehicle rolled down a sloped driveway.

A number of parking brake problems have cropped up over the years in a variety of cars and trucks.

A national class action was filed in 2005 against General Motors by owners of certain GM vehicles whose owners had to pay about \$500 apiece to replace parking brakes, also known as emergency brakes.

A year earlier, Hyundai Motor Co. was told to recall certain minivans because of defective parking brake cables in Trajet XG models built between 1999 and January 2004.

Some parking brake problems may have never come to light, cases may have been settled and still others might only be being discovered now.

Kane Legal, with many experienced attorneys, several of whom are also doctors, has experience and expertise in defective parking brake lawsuits. If you or someone you know was seriously hurt or killed because of an accident caused by a suspected defective parking brake, you may want to [contact a defective brake attorney](#) for a free evaluation of your case.