

Exhibit Examples

Fixer-Upper: Driver Wins \$839,000 After Brakes Fail¹

DATE	RO	MILEAGE	COMPLAINT	REPAIR	COMMENT
6-7-89	67480	118701	Possible bad timing chain; check brake system	Replace oil pump, drive shaft, distributor drive gear; Change oil filter & a/c element; Replace starter motor; Repaired door handle	NONE
12-13-89	101242 5	(123721)	#69 Check brake system; fluid leaking from both rear wheels	Reline rear brakes; Overhaul cylinders and replace drums, left side; Repair door package tray	Trans top cover leaking grease
3-9-90	102048 U	126,782 (from depo)	#69 Recheck RR wheel cylinder leaks; check engine power; Check speedo & lights	Overhaul RR cylinder; Parts charge only	NONE
3-12-90	J055535		Repair brake fluid leak from RR wheel	Replace grease seal for wheel hub to housing	NONE
3-15-90			Recheck leak from RR wheel cylinder area	No indication of any work being done	NONE
4-12-90	103870-6	127,506	Recheck brake pedal soft, goes to floor	Replace master cylinder	NONE
4-23-90		127,784	Check engine, runs rough; Check reason break warning light comes on and vehicle is hard to stop	Overhaul carburetor; Replace distributor cap & plug wires; No indication of work being done for brake light & hard to stop. Mechanic OK	NONE
7-5-90	105838	129,214	Check reason engine backfired and blows oil onto engine	Replaced high pressure service brake line and bleed system	NONE
8-15-90	106857	132,471	Check for leak from RR wheel cylinder area	Overhaul left side wheel cylinder; Replace grease seal; Clean drums and lining; Flush and bleed system; Replace park brake valve	Master cylinder has transmission oil in it
8-27-90	107116	132,572	Check brakes, inoperative	Bleed and adjust brakes	NONE
9-6-90	10733?	133,011	Check brake pedal, goes to floor	Replace master cylinder and hydro max	NONE

This chart, blown up for the jury, helped show that the subject truck had been in to the defendant's dealership for requested repair or check of the brake system 11 times in a 15-month period. It also showed that the defendant's responsive action was either inappropriate or inadequate repair and that no quality of control flags were raised at the dealership internally, nor was the customer warned that the brake problem was a potential "time bomb." The chart was referred to repeatedly during several witnesses' testimony and during closing. This demonstrative evidence was prepared and provided by attorneys Kathleen Maylin and Diane Lynn Vallette of Moray & Vallette, Los Angeles. These Plaintiff attorneys successfully applied its use in winning \$839,054 for their client in *Tony Counts v. Crenshaw Motors, et al.*; case BC075228.

¹ From San Francisco Daily Journal Los Angeles Daily Journal Verdicts & Settlements, Friday, October 27, 1995