



**Arent Fox**  
ATTORNEYS AT LAW

Lawrence F. Henneberger  
Tel: (202) 857-6887  
Fax: 202/857-6395  
lhennl@arentfox.com  
www.arentfox.com

**FACSIMILE TRANSMITTAL COVER SHEET**

Date: September 1, 1999

No. of Pages: 9  
(Including Cover Sheet)**PLEASE DELIVER TO:**

Name:

Jon White  
Office of Defects Investigation  
NHTSA

Fax Number:

202/366-7882

Verify Number:

202/366-5232

Attorney Number: 0047 Client Number: 016652 00000

Hard Copy Sent: No

THIS FACSIMILE CONTAINS PRIVILEGED AND CONFIDENTIAL INFORMATION INTENDED ONLY FOR THE USE OF THE ADDRESSEE(S) NAMED ABOVE. IF YOU ARE NOT THE INTENDED RECIPIENT OF THIS FACSIMILE, OR THE EMPLOYEE OR AGENT RESPONSIBLE FOR DELIVERING IT TO THE INTENDED RECIPIENT, YOU ARE HEREBY NOTIFIED THAT ANY DISSEMINATION OR COPYING OF THIS FACSIMILE IS STRICTLY PROHIBITED. IF YOU HAVE RECEIVED THIS FACSIMILE IN ERROR, PLEASE IMMEDIATELY NOTIFY US BY TELEPHONE AND RETURN THE ORIGINAL FACSIMILE TO US AT THE ADDRESS BELOW VIA THE POSTAL SERVICE. THANK YOU

Please Call As Soon As Possible If Transmission Is Not Complete: 202/857-6119

**Arent Fox Kintner Plotkin & Kahn, PLLC**  
1050 Connecticut Ave., N.W., Washington, D.C. 20036-5339



Arent Fox Kitner Plotkin & Kahn, PLLC  
1050 Connecticut Avenue, NW Washington, DC 20036-5339  
Phone 202/857-6000 Fax 202/857-6395 www.arentfox.com

Lawrence F. Henneberger

Direct (202) 857-6087  
hennl@arentfox.com

September 1, 1999

by telecopy and first-class mail

Mr. Jonathan D. White  
Chief, Recall Analysis Division  
Office of Defects Investigation  
National Highway Traffic Safety Administration  
400 Seventh Street, S.W., Room 5319  
Washington, D.C. 20590

Re: NSA-11ntu; RQ99-014

Dear Mr. White:

In his August 16, 1999, letter to you in the above-referenced matter, Michael Pangburn, Corporate Counsel for Monaco Coach Corporation (on behalf of Holiday Rambler), expressed his expectation that plaintiffs' counsel in the Firmin litigation would designate ODI representatives as witnesses, as had been done by counsel in the [REDACTED] suit. I have recently been provided notice that such action was taken in the [REDACTED] case by both the [REDACTED] plaintiffs, who have designated Mr. Bob Young and Mr. Nha Nguyen of the ODI staff as plaintiffs' expert witnesses in the litigation.

I am attaching extracted copies of the expert witness designations for your review, and request inclusion of this material as a supplement to the August 16, 1999, Holiday Rambler response in RQ99-014.

Sincerely,



Lawrence F. Henneberger

Attachments



- ✓ 42. Bob Young, NHTSA  
Office of Defects Investigation  
National Highway Traffic Safety Administration  
400 Seventh Street S.W.  
Washington, D.C. 20590
- ✓ 43. Nha Ntuyen, NHTSA  
Office of Defects Investigation  
National Highway Traffic Safety Administration  
400 Seventh Street S.W.  
Washington, D.C. 20590
44. Officer S. Carlson  
Texas Department of Public Safety

The only experts retained by Plaintiff [REDACTED] are Mr. Bodkin and Mr. Funderburke. Plaintiff will provide expert reports to opposing counsel for retained experts.

Respectfully Submitted,

**PATTON, TIDWELL, SANDEFUR, L.L.P.**  
Crown Executive Center, Suite 1A  
8500 Summerhill Road  
P.O. Box 5388  
Texarkana, Texas 75505-5388  
(903) 792-7080  
(Fax) 792-8233

By: \_\_\_\_\_

  
Kelly Tidwell  
State Bar No. 20020580

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the above and foregoing document has this 16th day of August, 1999 been forwarded to:

1. Mr. David Crowe, DeHay & Elston, LLP., 3500 Nationsbank Plaza, 901 Main Street, Dallas, Texas 75202-3738; and

2. Mr. J. Hawley Holman, Holman & Langdon, LLP., 2222 St. Michael Drive, Texarkana, Texas 75505-5357.

  
\_\_\_\_\_  
Kelly Tidwell



(13) [REDACTED]  
Bremen, IN [REDACTED]

(14) [REDACTED]  
Mesquite, TX [REDACTED]

(15) Officer S. Carlson, DPS  
DPS - THP

(16) [REDACTED]  
Texarkana, TX [REDACTED]

(17) [REDACTED]  
Houston, TX

(18) [REDACTED]  
Dallas, TX [REDACTED]

(19) [REDACTED]  
Dallas, TX [REDACTED]

(20) [REDACTED]  
Dallas, TX [REDACTED]

✓ (21) Bob Young, NHTSA  
Office of Defects Investigation  
National Highway Traffic Safety Administration  
400 Seventh Street S.W.  
Washington, D.C. 20590

(22) [REDACTED]  
Granger, Indiana

(23)



Granger, Indiana

✓(24)

Nha Nuyen, NHTSA  
Office of Defects Investigation  
National Highway Traffic Safety Administration  
400 Seventh Street S.W.  
Washington, D.C. 20590

A separate filing of expert reports will be made with respect to Mr. Botkin and Mr. Funderburke.

Respectfully submitted,

J. Hawley Holman

"Attorney in Charge"

Texas Bar No. 09903200

Arkansas Bar No. 77019

HOLMAN & LANGDON, L.L.P.

2222 St. Michael Drive - Box 5367

Texarkana, Texas 75505

Telephone: (903) 792-4513

Telecopier: (903) 792-3762

ATTORNEY FOR PLAINTIFFS  
JUDITH AND CHARLES FIRMIN

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the above and foregoing has been forwarded to the following attorney of record on this 16 day of August, 1999:

DAVID W. CROWE  
Attorney-in-Charge  
DeHay & Elliston, L.L.P.  
3500 NationsBank Plaza  
901 Main Street  
Dallas, Texas 75202-3736  
Telephone (214) 210-2400  
Telecopier (214) 210-2500

  
\_\_\_\_\_  
J. Hawley Holman



**Arent Fox**  
ATTORNEYS AT LAW

Lawrence F. Henneberger  
Tel: (202) 857-6087  
Fax: 202/857-6395  
lhenn@arentfox.com  
www.arentfox.com

**FACSIMILE TRANSMITTAL COVER SHEET**

Date: September 1, 1999

No. of Pages: **9**  
(Including Cover Sheet)**PLEASE DELIVER TO:**

Name:	Fax Number:	Verify Number:
Jon White Office of Defects Investigation NHTSA	202/366-7882	202/366-5232

Attorney Number: 0047 Client Number: 016652 00000

Hard Copy Sent: No

THIS FACSIMILE CONTAINS PRIVILEGED AND CONFIDENTIAL INFORMATION INTENDED ONLY FOR THE USE OF THE ADDRESSEE(S) NAMED ABOVE. IF YOU ARE NOT THE INTENDED RECIPIENT OF THIS FACSIMILE, OR THE EMPLOYEE OR AGENT RESPONSIBLE FOR DELIVERING IT TO THE INTENDED RECIPIENT, YOU ARE HEREBY NOTIFIED THAT ANY DISSEMINATION OR COPYING OF THIS FACSIMILE IS STRICTLY PROHIBITED. IF YOU HAVE RECEIVED THIS FACSIMILE IN ERROR, PLEASE IMMEDIATELY NOTIFY US BY TELEPHONE AND RETURN THE ORIGINAL FACSIMILE TO US AT THE ADDRESS BELOW VIA THE POSTAL SERVICE. THANK YOU

Please Call As Soon As Possible If Transmission Is Not Complete: 202/857-6119

**Arent Fox Kintner Plotkin & Kahn, PLLC**  
1050 Connecticut Ave., N.W., Washington, D.C. 20036-5339

**Arent Fox**  
ATTORNEYS AT LAW

Lawrence F. Hanneberger  
Tel: (202) 857-6087  
Fax: 202/857-6395  
lhann@arentfox.com  
www.arentfox.com

**FACSIMILE TRANSMITTAL COVER SHEET**

**Date:** September 1, 1999

**No. of Pages:**  
(Including Cover Sheet)

**PLEASE DELIVER TO:**

<b>Name:</b>	<b>Fax Number:</b>	<b>Verify Number:</b>
Jon White	202/366-7882	202/366-5232
Office of Defects Investigation		
NHTSA		

**Attorney Number:** 0047    **Client Number:** 016652 0000

**Hard Copy Sent:** No

THIS FACSIMILE CONTAINS PRIVILEGED AND CONFIDENTIAL INFORMATION INTENDED ONLY FOR THE USE OF THE ADDRESSEE(S) NAMED ABOVE. IF YOU ARE NOT THE INTENDED RECIPIENT OF THIS FACSIMILE, OR THE EMPLOYEE OR AGENT RESPONSIBLE FOR DELIVERING IT TO THE INTENDED RECIPIENT, YOU ARE HEREBY NOTIFIED THAT ANY DISSEMINATION OR COPYING OF THIS FACSIMILE IS STRICTLY PROHIBITED. IF YOU HAVE RECEIVED THIS FACSIMILE IN ERROR, PLEASE IMMEDIATELY NOTIFY US BY TELEPHONE AND RETURN THE ORIGINAL FACSIMILE TO US AT THE ADDRESS BELOW VIA THE POSTAL SERVICE. THANK YOU

Please Call As Soon As Possible If Transmission Is Not Complete: 202/857-6119

**Arent Fox Kintner Plotkin & Kahn, PLLC**  
1050 Connecticut Ave., N.W., Washington, D.C. 20036-5339



Arent Fox Kintner Plotkin & Kahn, PLLC  
1050 Connecticut Avenue, NW Washington, DC 20036-5339  
Phone 202/857-6000 Fax 202/857-6395 www.arentfox.com

Lawrence F. Henneberger

Direct (202) 857-6087  
hennl@arentfox.com

September 1, 1999

by telecopy and first-class mail

Mr. Jonathan D. White  
Chief, Recall Analysis Division  
Office of Defects Investigation  
National Highway Traffic Safety Administration  
400 Seventh Street, S.W., Room 5319  
Washington, D.C. 20590

Re: NSA-11Intn; RQ99-014

Dear Mr. White:

In his August 16, 1999, letter to you in the above-referenced matter, Michael Pangburn, Corporate Counsel for Monaco Coach Corporation (on behalf of Holiday Rambler), expressed his expectation that plaintiffs' counsel in the Firmin litigation would designate ODI representatives as witnesses, as had been done by counsel in the [REDACTED] suit. I have recently been provided notice that such action was taken in the [REDACTED] by both the [REDACTED] plaintiffs, who have designated Mr. Bob Young and Mr. Nha Nguyen of the ODI staff as plaintiffs' expert witnesses in the litigation.

I am attaching extracted copies of the expert witness designations for your review, and request inclusion of this material as a supplement to the August 16, 1999, Holiday Rambler response in RQ99-014.

Sincerely,

Lawrence F. Henneberger

Attachments

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
TEXARKANA DIVISION

[REDACTED]

§  
§  
§  
§  
§  
§  
§  
§  
§  
§

C.A. No. 88CV122  
JURY

vs.  
MONACO COACH CORPORATION  
AND MCC ACQUISITION CORPORATION

DESIGNATION OF EXPERT WITNESSES

COMES NOW David Warrick, Plaintiff herein, and designates the following as

his expert witnesses:

1. [REDACTED]  
Texarkana, Texas [REDACTED]  
[REDACTED]
2. [REDACTED]  
Texarkana, Texas [REDACTED]  
[REDACTED]
3. [REDACTED]  
New Boston, Texas [REDACTED]  
[REDACTED]
4. [REDACTED]  
Texarkana, Arkansas [REDACTED]  
[REDACTED]
5. [REDACTED]  
Texarkana, Texas [REDACTED]  
[REDACTED]

- ✓ 42. **Bob Young, NHTSA**  
**Office of Defects Investigation**  
**National Highway Traffic Safety Administration**  
**400 Seventh Street S.W.**  
**Washington, D.C. 20590**
- ✓ 43. **Nha Ntuyen, NHTSA**  
**Office of Defects Investigation**  
**National Highway Traffic Safety Administration**  
**400 Seventh Street S.W.**  
**Washington, D.C. 20590**
44. **Officer S. Carlson**  
**Texas Department of Public Safety**

The only experts retained by Plaintiff David Warrick are Mr. Bodkin and Mr. Funderburke. Plaintiff will provide expert reports to opposing counsel for retained experts.

Respectfully Submitted,

**PATTON, TIDWELL, SANDEPUR, L.L.P.**  
**Crown Executive Center, Suite 1A**  
**6500 Summerhill Road**  
**P.O. Box 5388**  
**Texarkana, Texas 75506-5388**  
**(903) 792-7080**  
**(Fax) 792-8233**

By:

  
\_\_\_\_\_  
**Kelly Tidwell**  
**State Bar No. 20020580**

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the above and foregoing document has this 16th day of August, 1998 been forwarded to:

1. Mr. David Crowe, DeHay & Ellston, L.L.P., 3500 Nationalbank Plaza, 901 Main Street, Dallas, Texas [REDACTED] and

2. Mr. J. Hawley Holman, Holman & Langdon, L.L.P., 2222 St. Michael Drive, Texarkana, Texas [REDACTED]

  
\_\_\_\_\_  
Kelly Tidwell