





U502 2.0L GTDI 10-70mph Testing and Verification

Draft

VI Attribute
10/24/17

EA17-002 001343 TR

Slide 1 (of 6)



Vehicle Info

- **Vehicle Info: 2015 U502 (Explorer XLT) 2.0L GTDI FWD**
- **VIN: 1FM5K7D97FG [REDACTED] – 7/14 build - Tag: [REDACTED]**



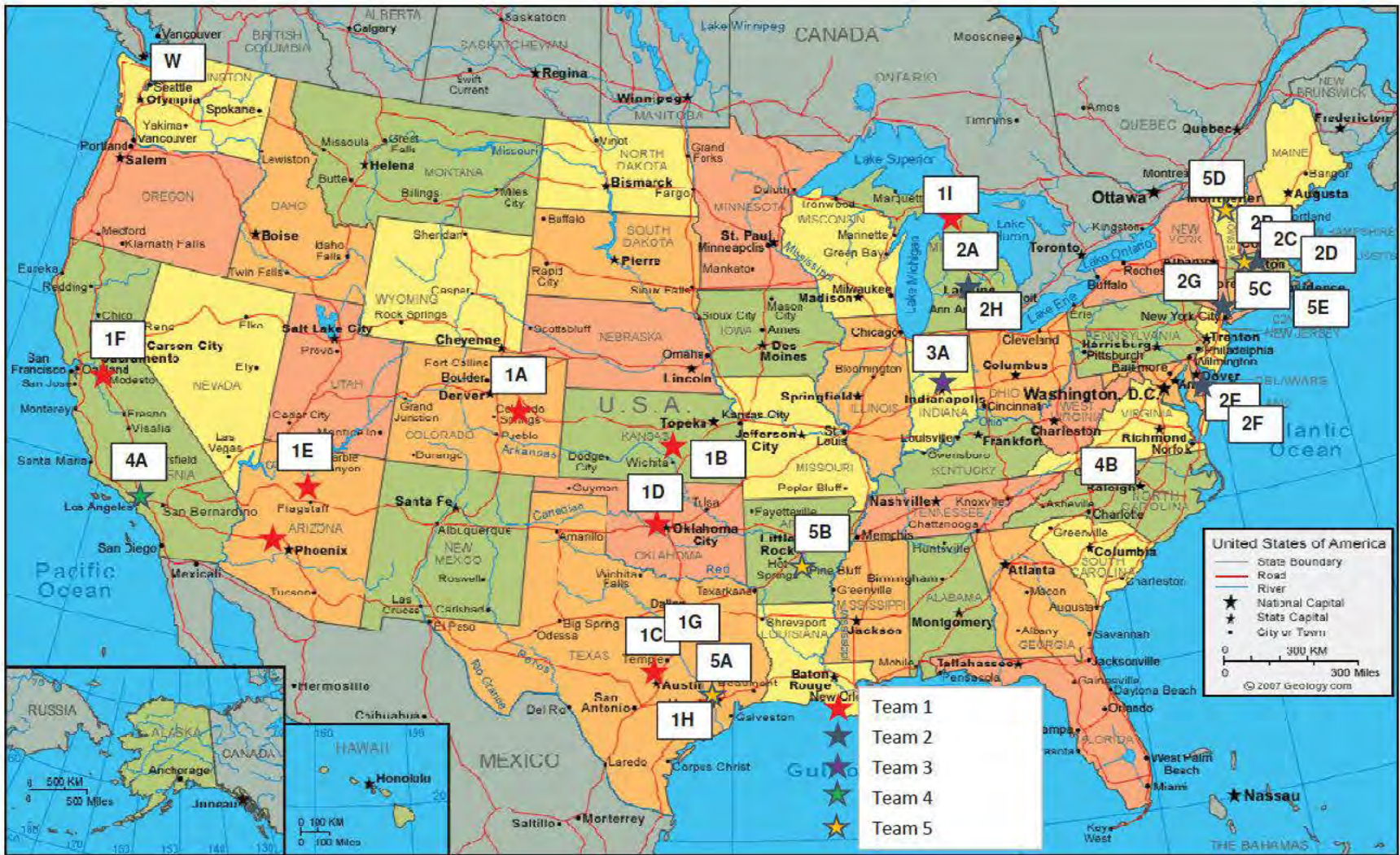


Backup





Insert pictures here (if requested):



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**Persad v Ford Motor
Company**

**Expert Report of Paul
M. Taylor, Ph.D., P.E.**

Persad v Ford Motor Company

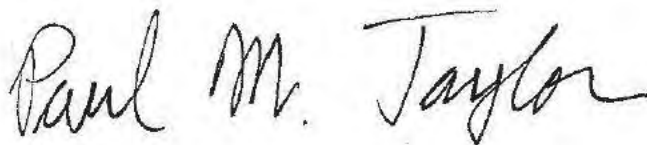
Expert Report of Paul M. Taylor, Ph.D., P.E

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A handwritten signature in black ink that reads "Paul M. Taylor". The signature is written in a cursive style with a large, sweeping "P" and "T".

July 29, 2019

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Personal Background and Qualifications

Dr. Paul M. Taylor

I am a Principal Engineer employed by Exponent, an engineering and scientific consulting firm, and am located in our Menlo Park, California office. I joined Exponent (then known as Failure Analysis Associates, Inc.) in 1986 after completing my B.S., M.S., and Ph.D. in Mechanical Engineering. I am a registered Professional Engineer in the State of California, license number 31069. My experience at Exponent has included design and failure root-cause analyses of hundreds of products, including vehicles, and components and systems used in vehicles. As part of my analyses of the real world performance of components and systems, I regularly review and analyze a variety of data, including databases maintained by automotive companies, such as warranty repair data.

Attached and marked as Exhibit A to this declaration is a copy of my current curriculum vitae. My current billing rate is \$460 per hour. My testimony history for the past four years is provided as Exhibit B. The materials reviewed are shown in Exhibit C.

The opinions in this declaration are provided to a reasonable degree of engineering certainty. I reserve the right to supplement this report and to expand or modify opinions based on review of additional material as it becomes available through any additional work by me, or review of work performed by others.

Introduction and Background

Proposed Class Definition

Plaintiffs have requested the Court to certify a class defined as: “All persons or entities who currently own or lease a “Class Vehicle” which means retail 2016 and 2017 model year Ford Explorers.”¹ In this report, these vehicles will be called “Subject Vehicles.” Plaintiffs have excluded Police Interceptor Utility vehicles from their requested class.²

Plaintiffs have also requested certification of several Subclasses, including an Unjust Enrichment Class, two Fraudulent Concealment Classes, an Express Warranty Class, two Implied Warranty Classes, a Georgia Class and a Pennsylvania Class, where each Subclass pertains only to certain identified states.³

Plaintiffs have defined their alleged defect as an automotive defect that allows the intrusion and accumulation of exhaust fumes, including carbon monoxide (“CO”), under certain driving conditions.⁴ In this report, this will be referenced as the “Subject Concern”.

Assignment

I was asked by counsel for Ford Motor Company to provide my analysis of the following issues:

- What conditions are needed for CO levels within the cabin of the Subject Vehicles to become elevated.
- Whether earlier model year 2011-2015 Explorers are substantially similar to the Subject Vehicles relative to the Subject Concern, and how do Police Interceptor Utility vehicles differ from retail Explorers.
- What options do Ford-authorized repair shops have to repair vehicles brought in for concerns associated with the Subject Concern.
- Counts and/or percentages of Subject Vehicles in each of the following groups:
 - Vehicles having a Ford-paid warranty repair for the Subject Concern within the first year of service, for vehicles that were at least one year old when Customer Satisfaction Program (“CSP”) 17N03 was issued.
 - How many Subject Vehicles had a Ford-paid warranty repair in the first year for ANY reason, for vehicles at least one year old when CSP 17N03 was issued, and what percent of those vehicles had a repair for the Subject Concern.

¹ Motion for Class Certification and Appointment of Class Counsel and Class Representative, Suresh Persad, Daniel G. Wright and Robert S. Drummond v. Ford Motor Company, 2:17-cv-12599-TGB-MKM, June 25, 2019, (“Class Certification Motion”), page 1.

² Plaintiffs’ Brief in Support of Motion for Class Certification, Suresh Persad, Daniel G. Wright and Robert S. Drummond v. Ford Motor Company, 2:17-cv-12599-TGB-MKM, June 25, 2019, (“Class Certification Brief”), page 1, footnote 1.

³ Class Certification Motion, pp. 1-4.

⁴ Class Certification Brief, page 1.

- Vehicles that had the CSP 17N03 work performed, and what percent of the population of Subject Vehicles they represented.
- Vehicles that had a repair for CSP 17N03 and had a subsequent Ford-paid repair for the Subject Concern since the repair.
- Vehicles that had a muffler repair for the Subject Condition.
- Vehicles purchased after the CSP 17N03 was announced.
- Vehicles that currently have more than three years since the start of warranty, and an estimate of the number of vehicles that might also currently have over 36,000 miles.
- What are the experiences of the three Named Plaintiffs, and what was learned from my inspections and test drives of their Explorers.
- What observations do I have about the report prepared by Plaintiffs' expert, Dr. Galastis.
- What observations do I have regarding testing by Ford and by the National Highway Traffic Safety Administration for CO intrusion in the Subject Vehicles.
- Whether the Subject Concern is common across all Subject Vehicles.