

From: [Keith E. Smith](#)
To: [Rahimpour, Ryan \(NHTSA\)](#)
Subject: RE: File Request - Data Files Related to ARBOC Spirit of America Trolley Bus Fires
Date: Tuesday, April 19, 2022 1:50:51 PM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)

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Mr. Rahimpour,

As we discussed, my law firm was retained as outside counsel to LAWA regarding this matter. My firm engaged the forensic firm Exponent to investigate the two fire incidents. Exponent has not prepared a report and I do not anticipate that Exponent will prepare a report. I anticipate that this matter will likely involve future litigation between the parties. I understand that based on the above, you will likely need to close your file.

Thank you.

Keith E. Smith

Partner

WOOD SMITH HENNING & BERMAN LLP

A 21804 Cactus Avenue, Suite 200, Riverside, CA 92518

D 951.779.5015 M 951.318.6684

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From: Rahimpour, Ryan (NHTSA) <ryan.rahimpour@dot.gov>

Sent: Friday, April 8, 2022 3:58 AM

To: Keith E. Smith <KESmith@wshblaw.com>

Subject: [EXTERNAL] RE: File Request - Data Files Related to ARBOC Spirit of America Trolley Bus Fires

Good morning Mr. Smith,

It was great talking to you on the phone. Can you please send me the email that we discussed over the phone.



Regards,

Ryan Rahimpour
Safety Defects Engineer
Medium and Heavy Duty Vehicles Defects Division
Office of Defects Investigation
Department of Transportation
National Highway Traffic Safety Administration
1200 New Jersey Avenue SE., Washington, DC 20590
Office: 202-366-8756
Room W48-218

From: Keith E. Smith <KESmith@wshblaw.com>

Sent: Tuesday, April 5, 2022 6:47 PM

To: Rahimpour, Ryan (NHTSA) <ryan.rahimpour@dot.gov>

Subject: File Request - Data Files Related to ARBOC Spirit of America Trolley Bus Fires

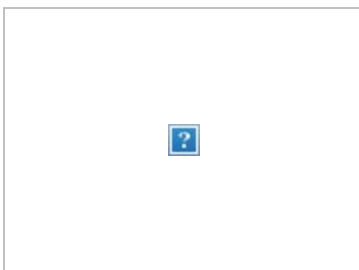
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Mr. Rahimpour,

My office has been retained to represent the interests of LAWA in the above-referenced matter. I wanted to follow my voicemail I left for you.

I wanted to let you know that there is no report from Exponent regarding the fire investigation. However, I am willing to discuss this matter with you and share what information that we do have regarding the investigation.

You can reach me at (951) 318-6684.



Keith E. Smith

Partner

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