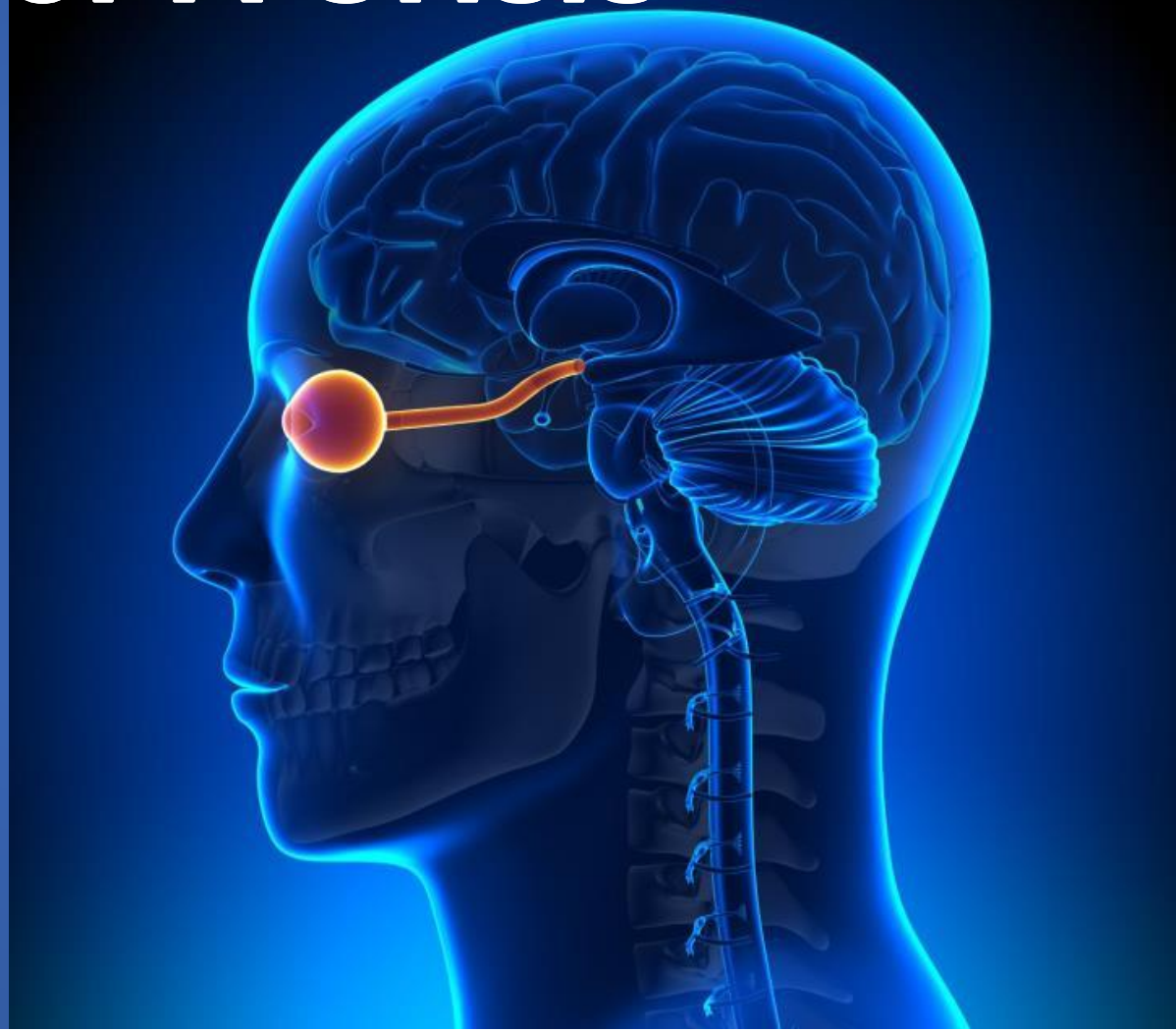
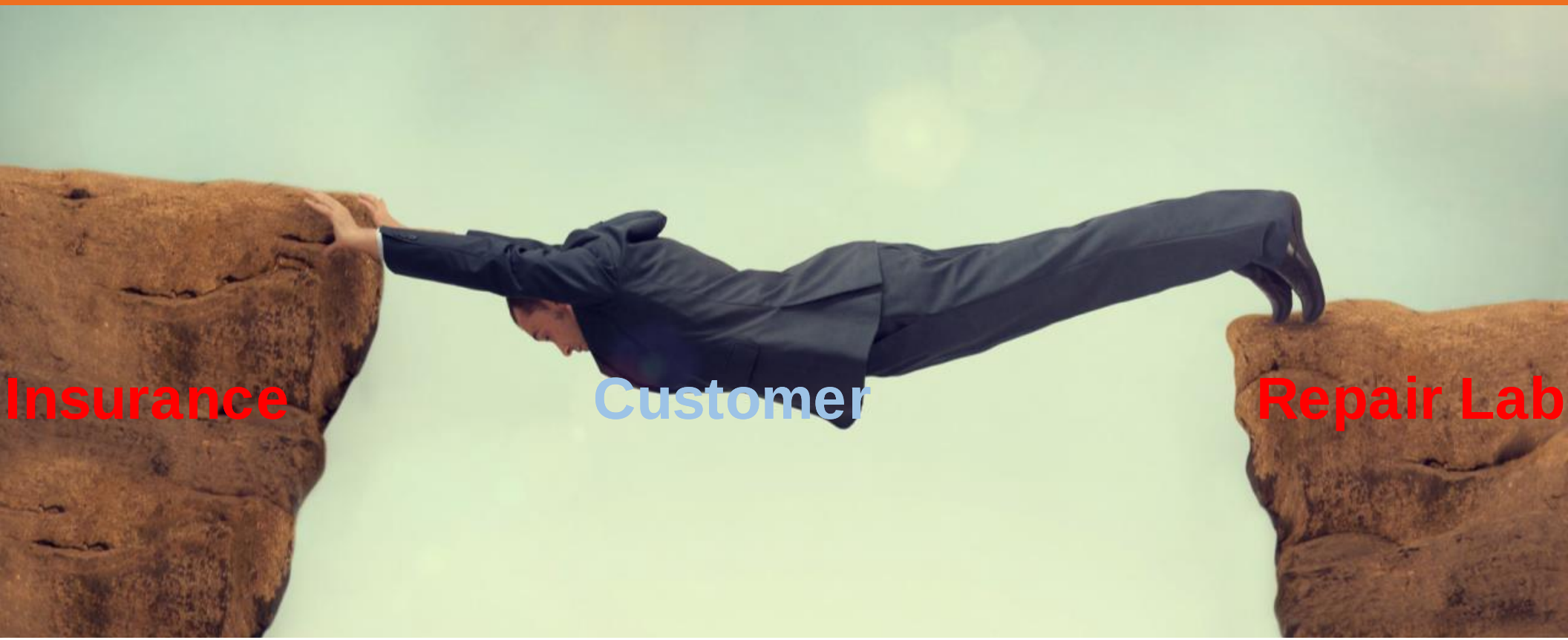
Anatomy of A Crisis

Getting Vehicle Safety Professionals Re-Focused On Fighting The Insurance Industry

Todd Tracy
Dallas, Texas



It’s Time To Get The Insurance Companies Out Of Your Vehicle Repair Labs Because They Are Jeopardizing Your Customers Lives’



It Has Been Suggested That Our Country Is No Longer Great And No, Donald Trump Didn't Say It First

To Make Your Industry Great,
Your Are Going To Have To
Change The Way You Fight The
Insurance Companies And Some
Of You May Believe It’s Futile and Stupid

In The Spirit of Change, You Are No Longer Vehicle Repairmen Or Vehicle Body Shops

You Are Vehicle Safety Professionals

You Are On The Front Line Of Safety At Your Vehicle Repair Labs

You Don’t Get The Luxury of a Bad Day At Work

Unified Mission Statement

As Vehicle Safety Professionals, We Have A Moral and Legal Obligation To Ensure That Our Customers Make It Home Safely Because Our Vehicle Repairs Were Performed Properly, Responsibly and Ethically

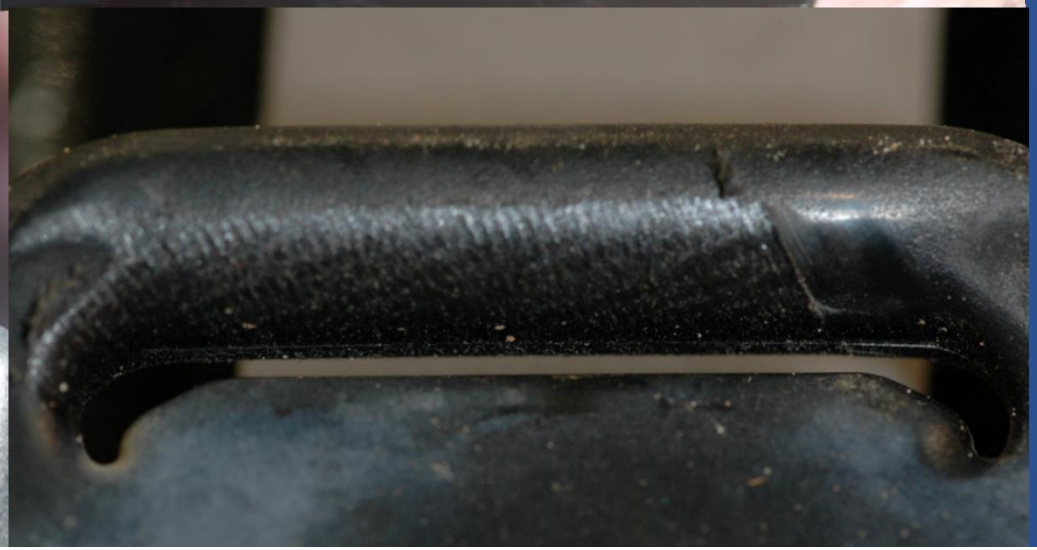
As Vehicle Safety Professionals:

1. You Must Be Willing To Embrace A New Philosophy That Focuses On Educating Vehicle Safety Professionals About Crash Science
2. Engage The Customers To Fight With You Against the Insurance Companies
3. Let The Insurance Companies Know That Your Industry Is Energized and Excited And Is Ready For A Fight

1. Everyone in your vehicle repair labs should always ask questions about the crash so that your vehicle safety professionals know what needs to be evaluated for replacement

Why does a vehicle safety professional care about who was in the vehicle when doing an estimate or repair?

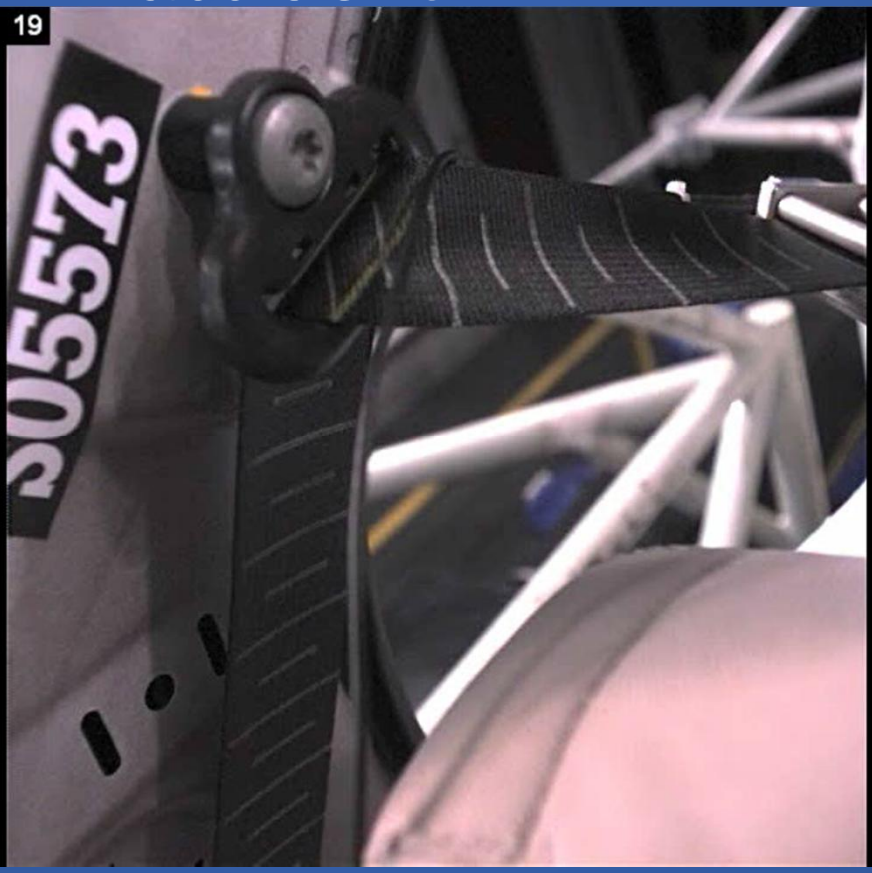
So you can diagnose seatbelt use



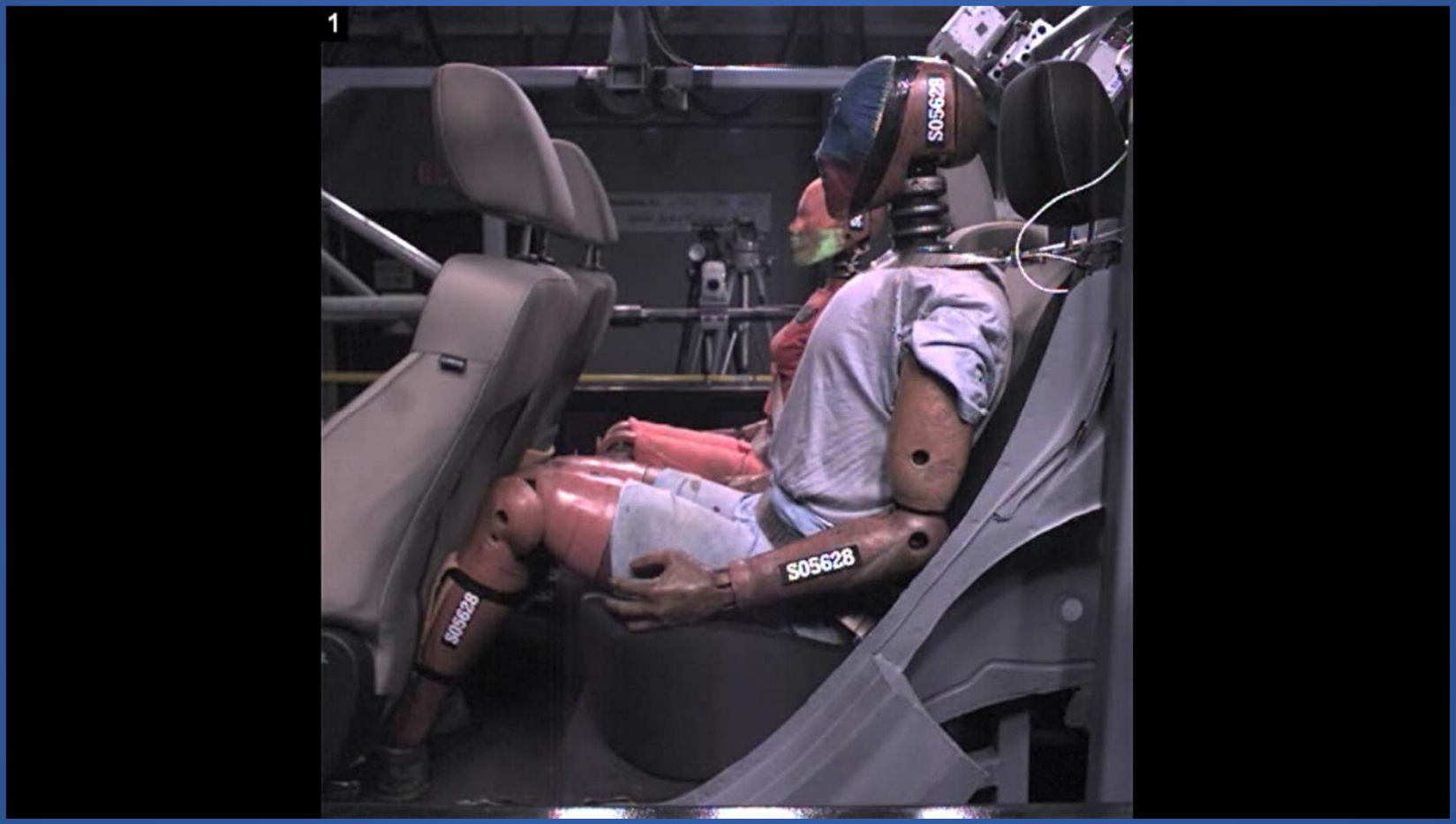
Seatbelt buckles are good for one crash event and fail when loaded in a second accident

Seatbelt webbing separates when previously loaded in an accident

D-Rings fracture when loaded in more than one accident



Evaluate front seatbacks if rear seats were occupied because the front seat can get damaged from rearward loading



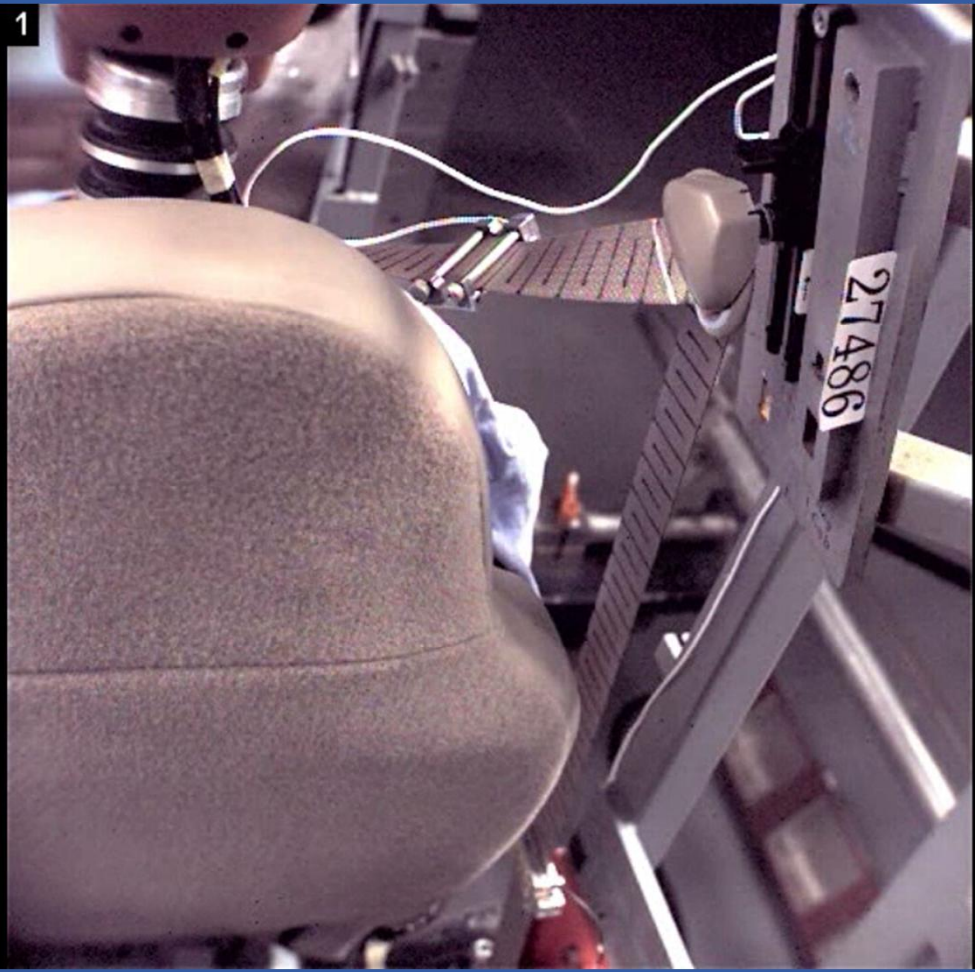
Seat tracks must be evaluated to ensure they have not been damaged due to loading

Anti-Submarining seat features are not effective after one crash event

Who has heard of the seat cushion airbag?
Have you replaced one in a seat?

Seat cushion attachments must be evaluated because the attachment hardware is deformed

Due to rebound in frontal impacts, seats must be evaluated

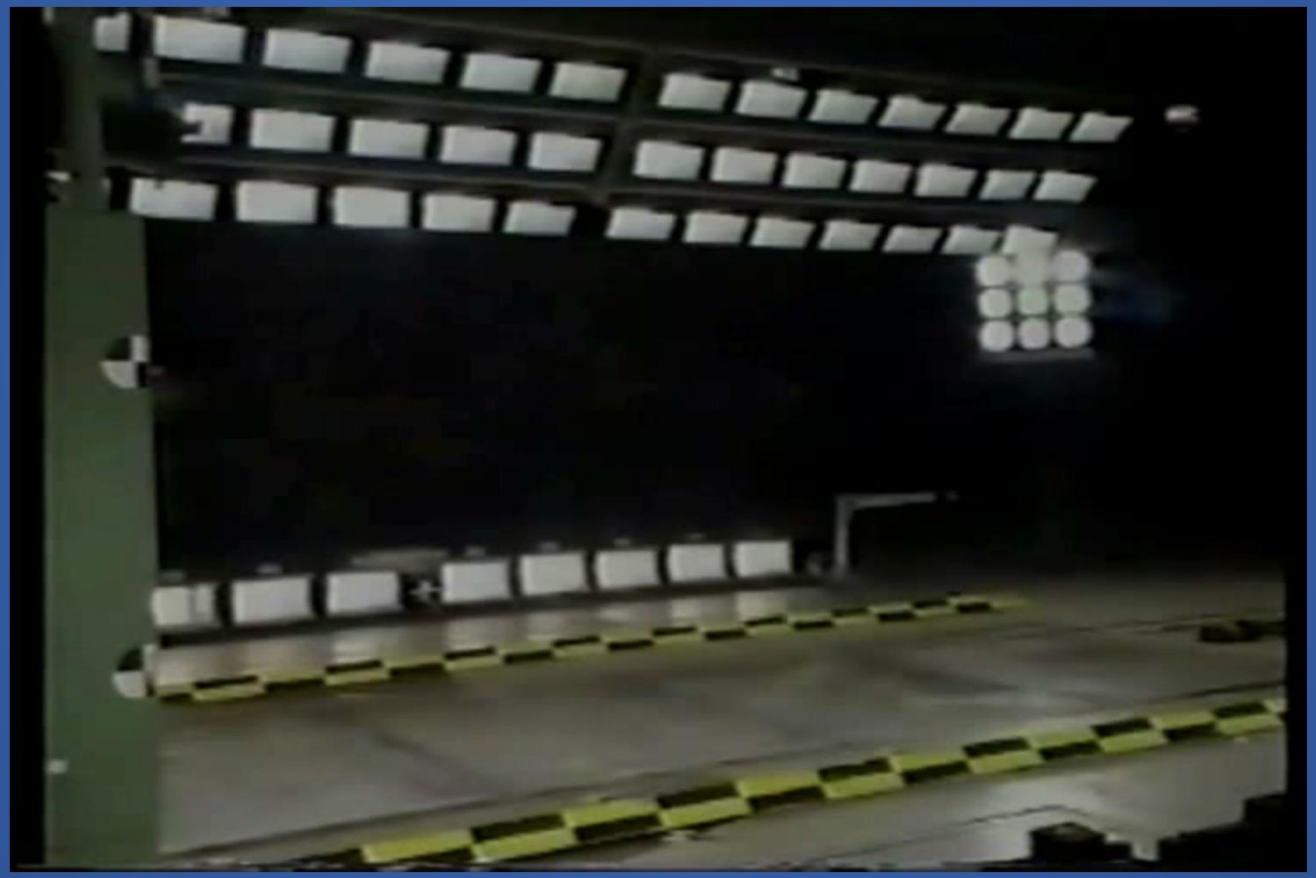


In rear impact accidents, seats are designed to yield and deflect so they must be replaced if an occupant over 125lbs was in the seat

Head restraint posts and friction locks must be evaluated

Head Restraint Posts Must Be Evaluated

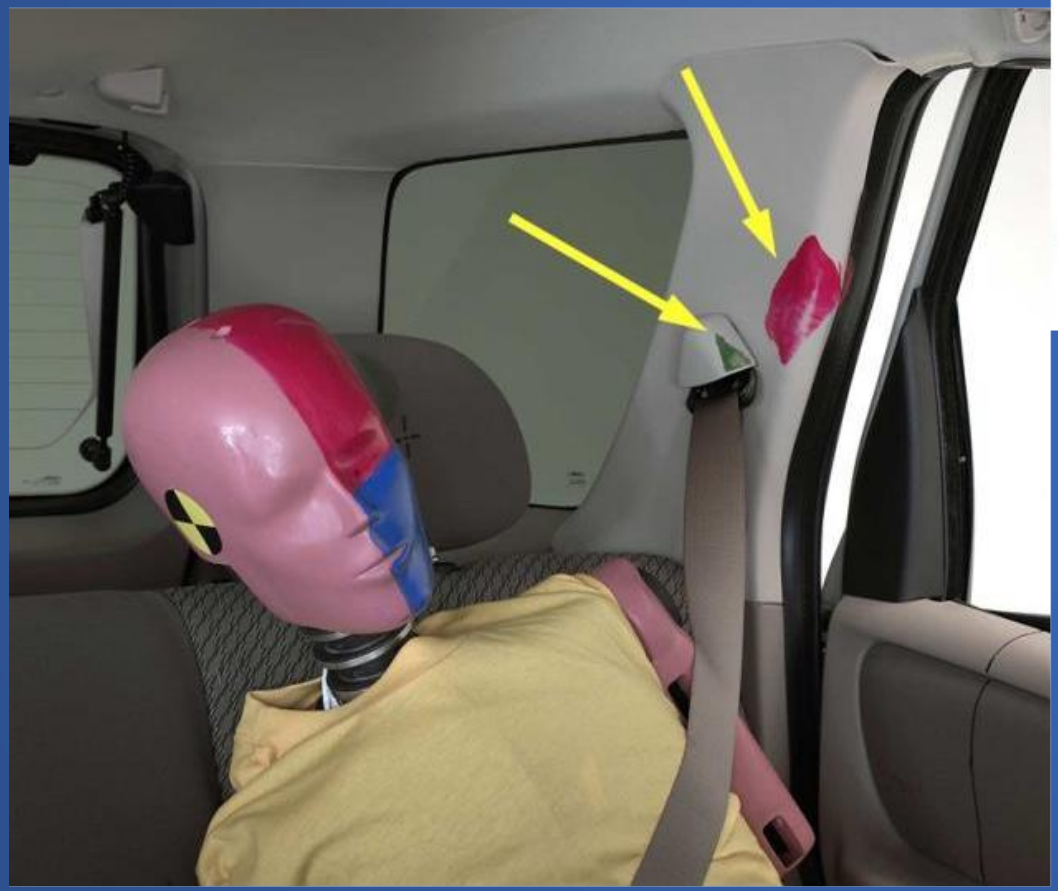
Why should vehicle safety professionals care about what cargo your customers were transporting in the trunk?

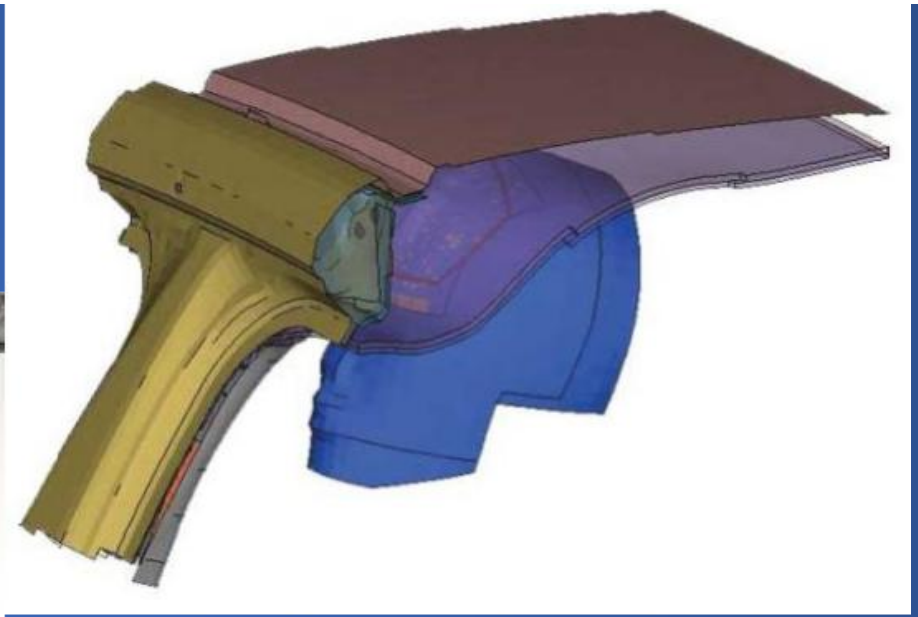


2. Vehicle safety professionals must always think outside the box and check for damage in areas that may not be so obvious when preparing repair estimates and when restoring vehicles back to a crashworthy condition

If the interior surface has a witness mark,

you must examine underneath the trim



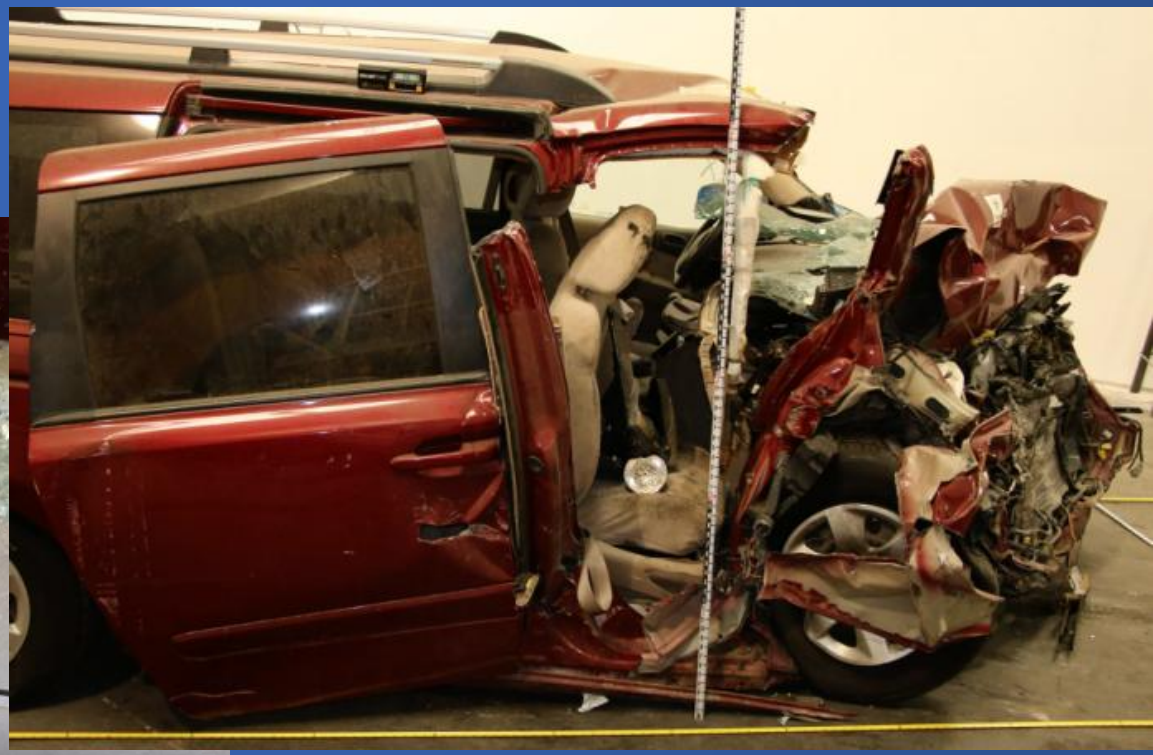


If you find an interior witness mark, the FMVSS 201U padding is likely bottomed out and the door inner must be replaced

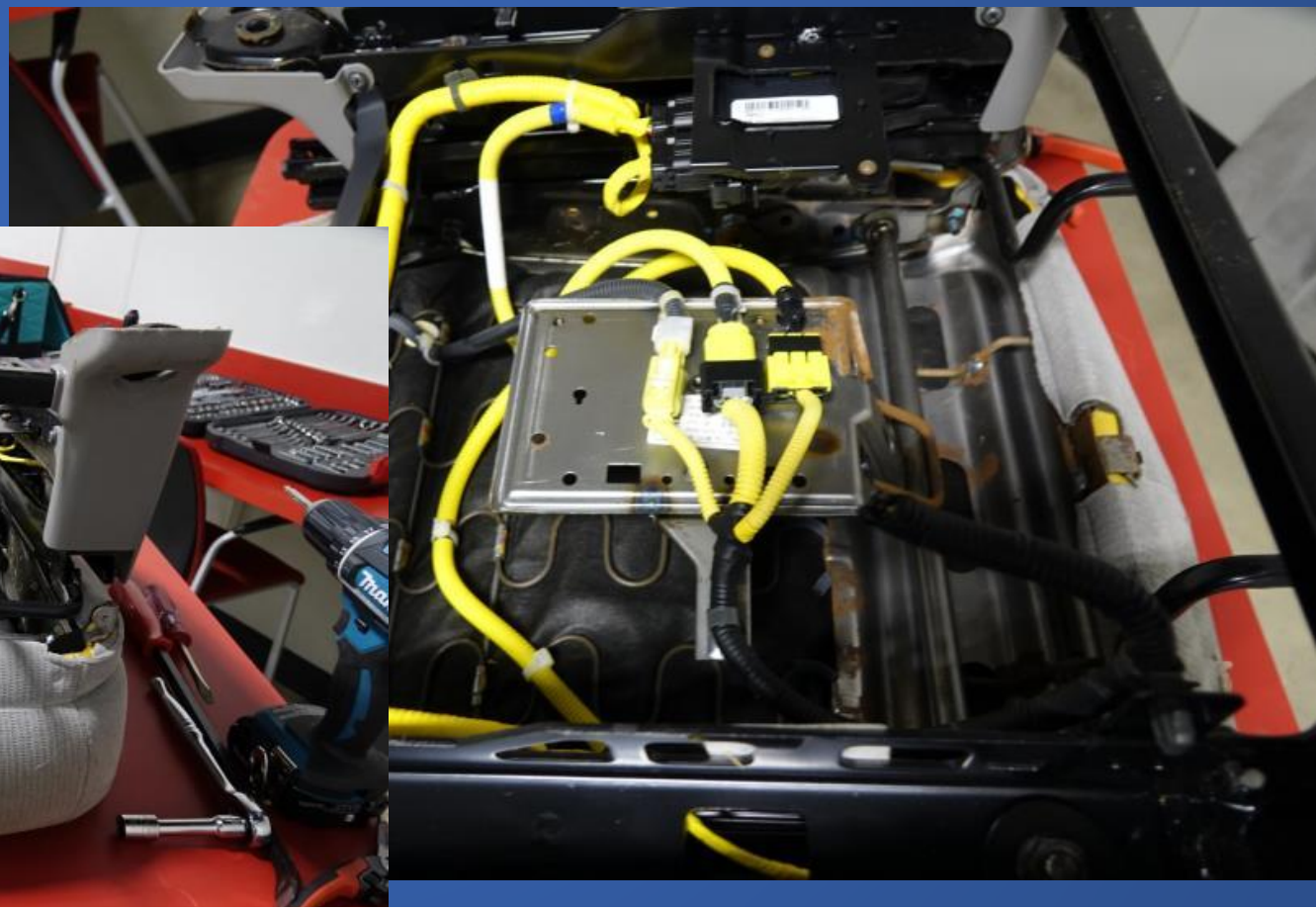
What is behind the knee bolster needs to be replaced because the knee bolster material is designed to crush

3. Always scan the vehicle for DTC codes before and after your vehicle safety professional repairs the vehicle and then print off the results and keep them to CYA

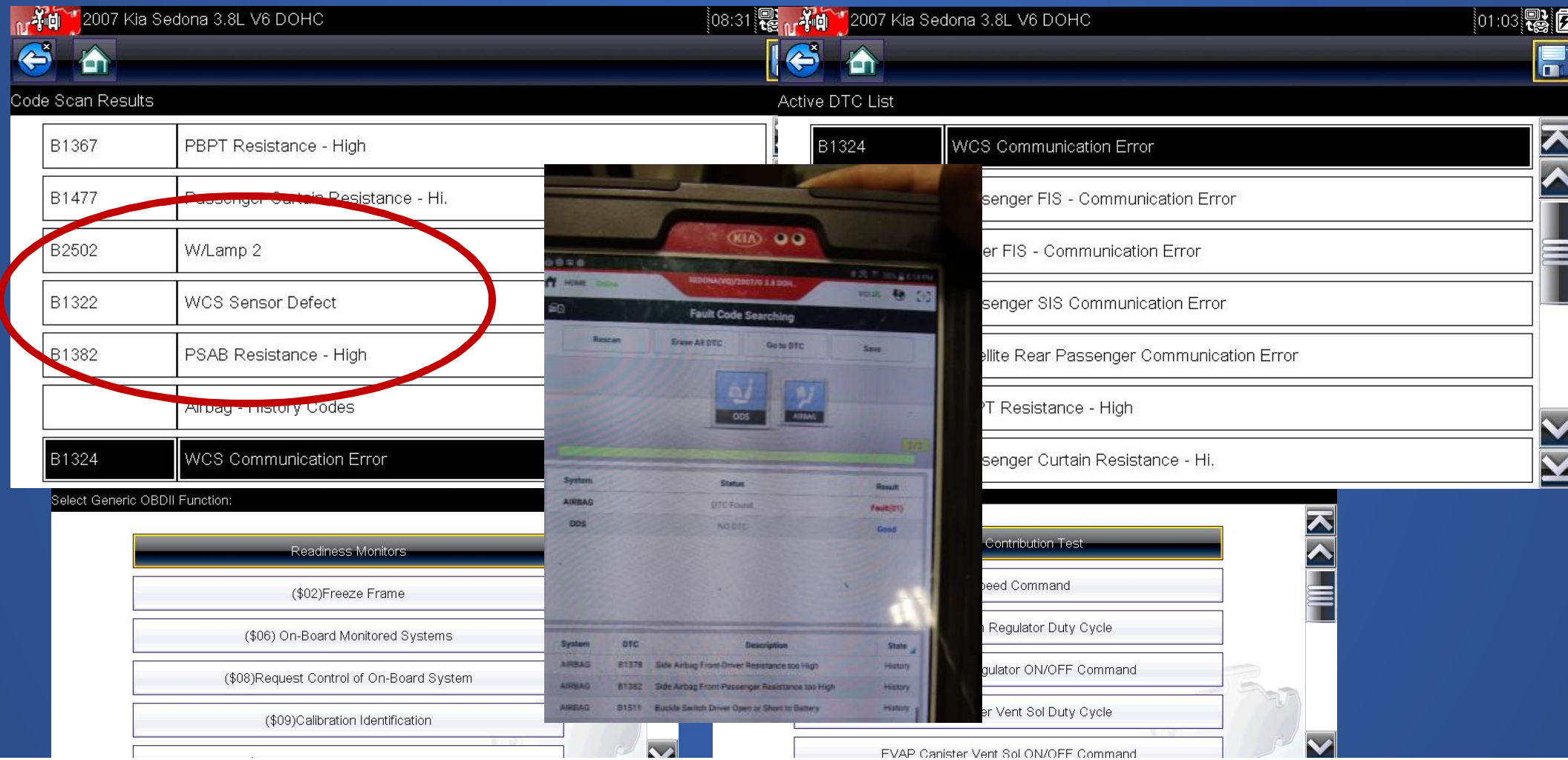
High Speed Frontal Impact – No Airbag



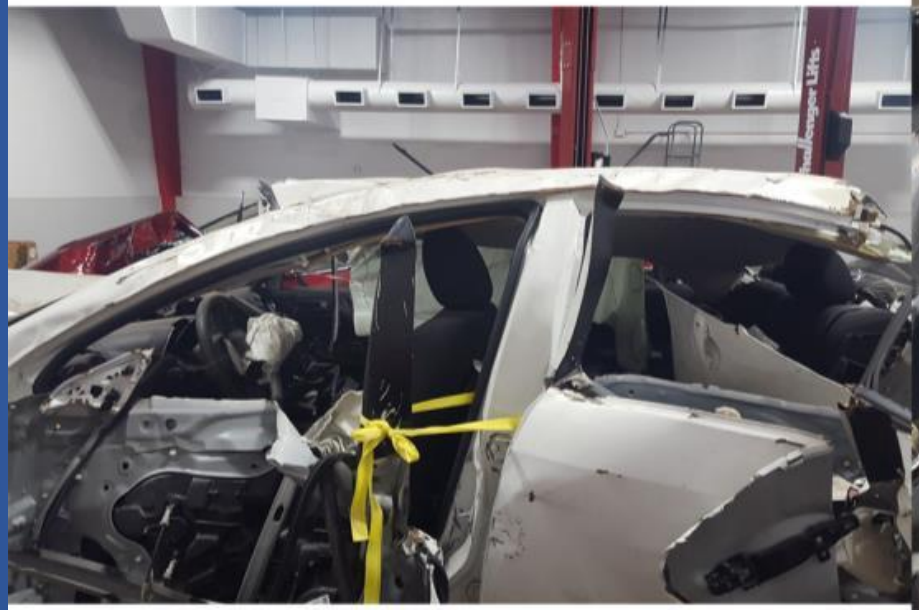
Airbag system failure – not repaired at dealer



Revealed with use of scan tool



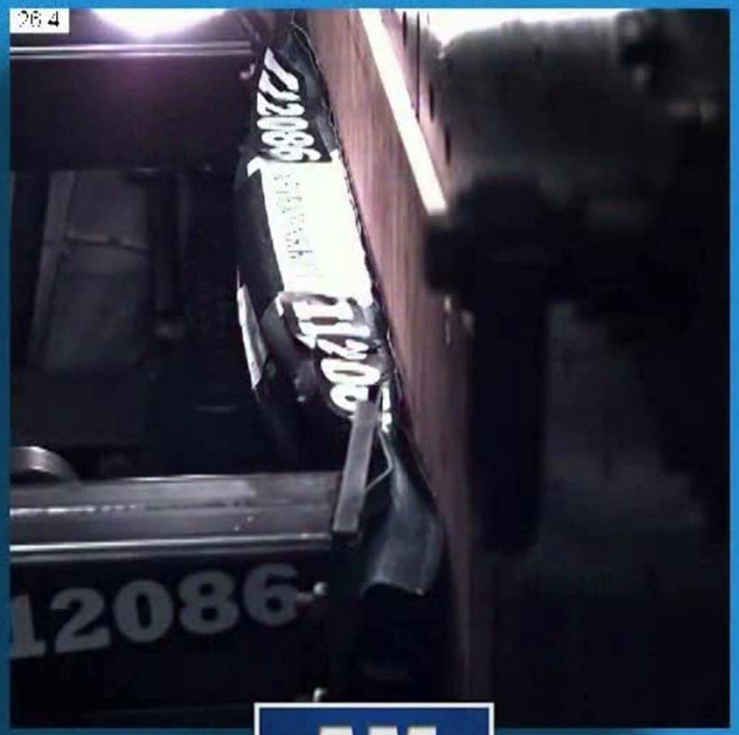
Airbags Will Not Deploy If The Vehicle Is Experiencing Electrical Or Sensing Issues That A Scan Detects



Airbags Will Not Deploy If The Vehicle Is Experiencing Electrical Or Sensing Issues That A Scan Detects

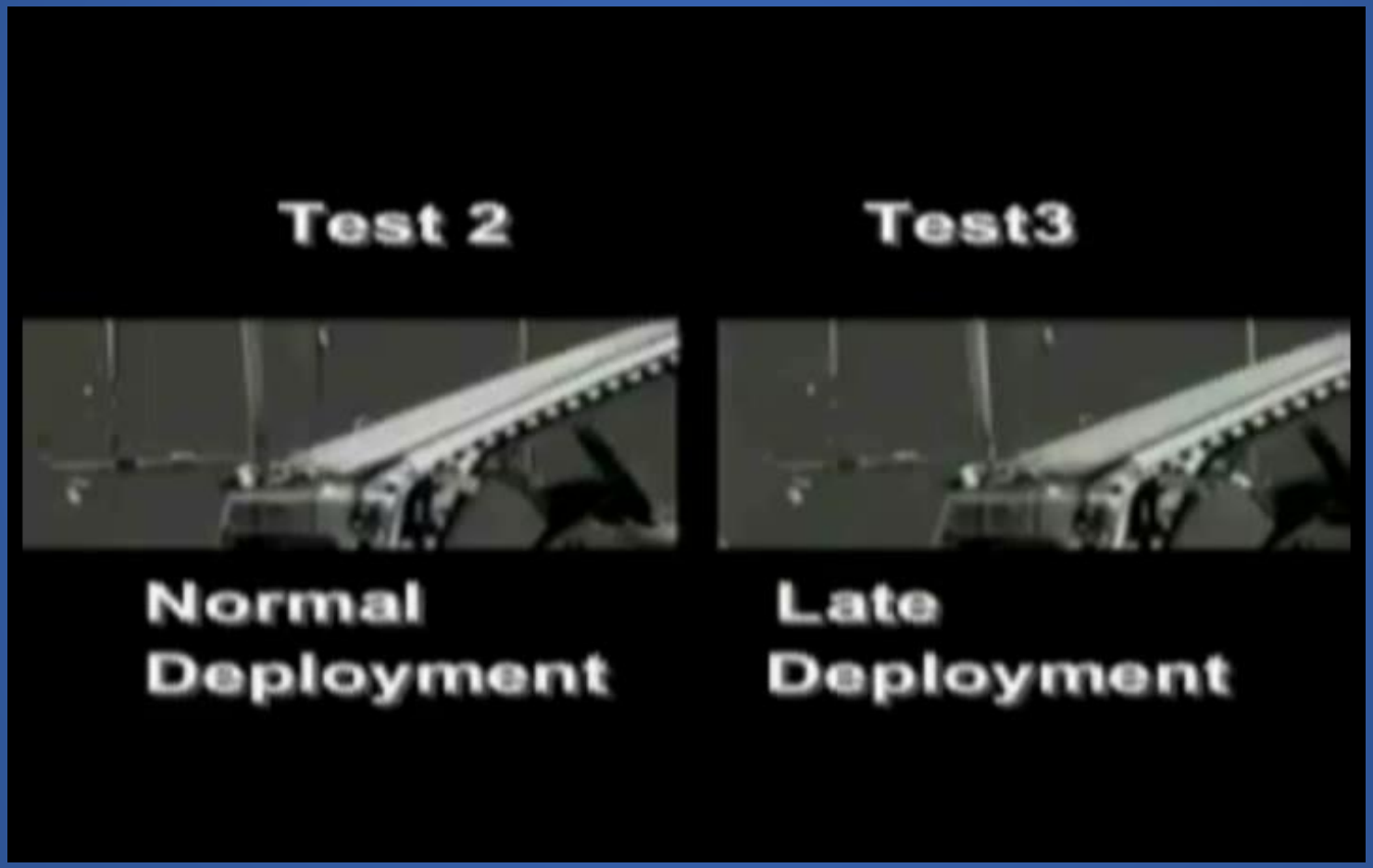
4. When aftermarket suppliers tell a vehicle safety professional that their product is just as safe as OEM parts, NEVER TRUST them and demand that they VERIFY with actual crash testing

OEM



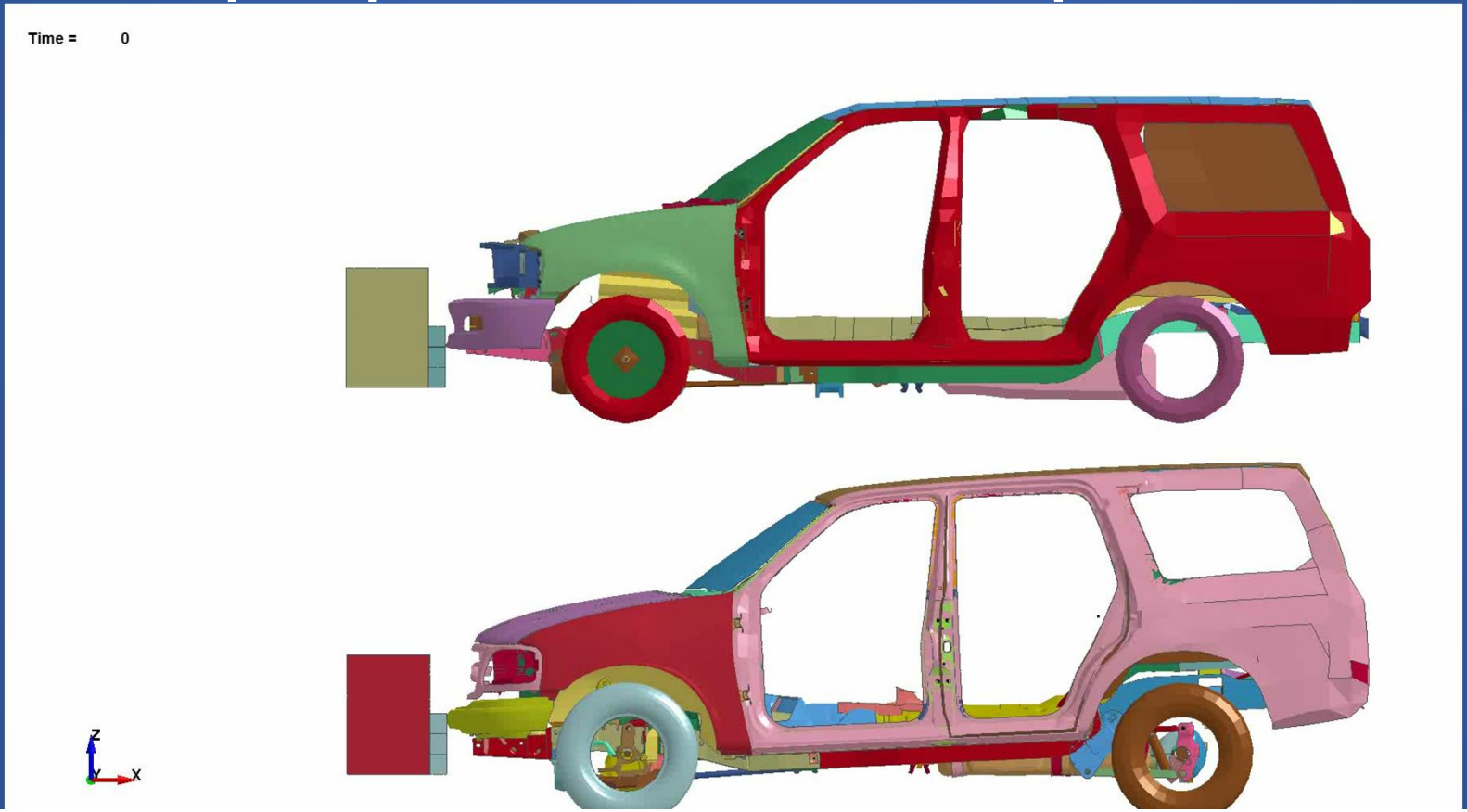
AM

Aftermarket Parts Can Change The Airbag Deployment Threshold

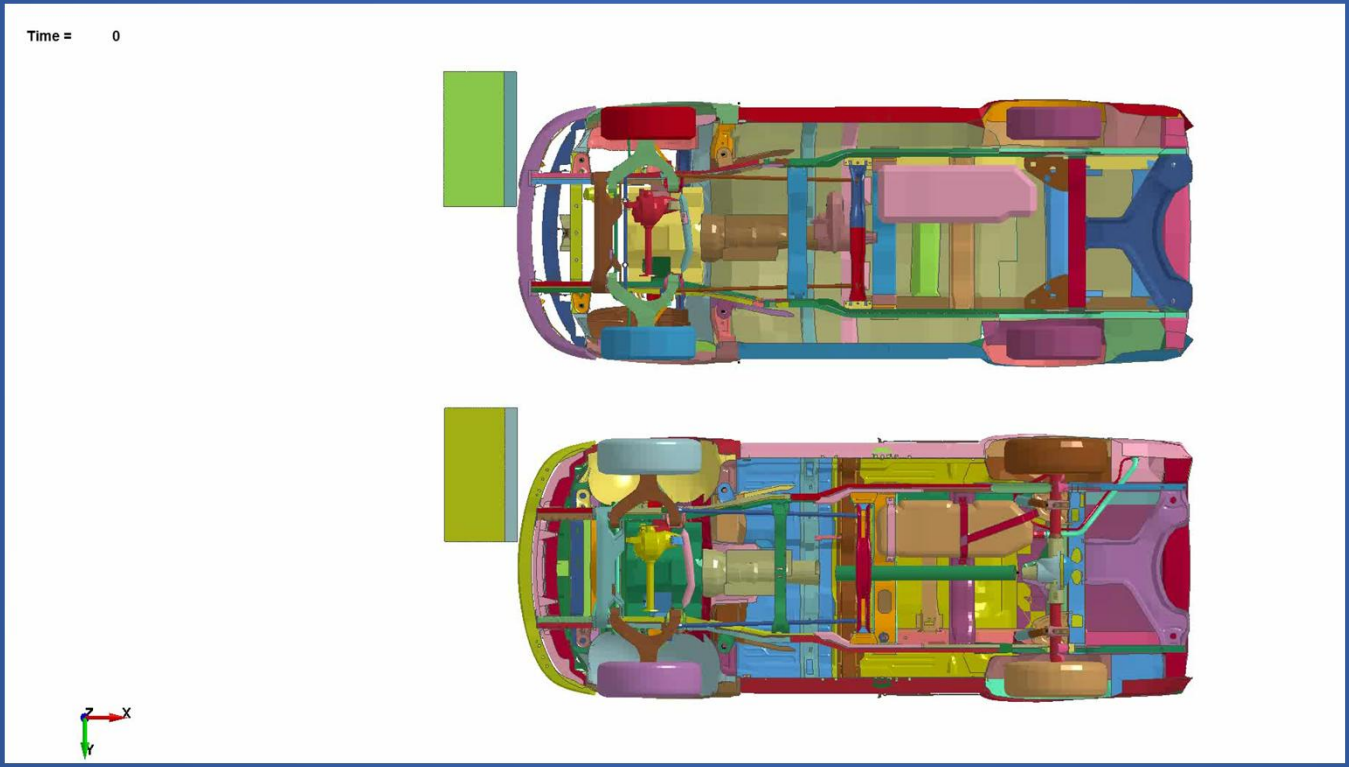


5. Insurance Companies That Bully Vehicle Repair Labs Into Improper Repairs Cause You To Violate Your Industry and Individual Companies' Mission Statement

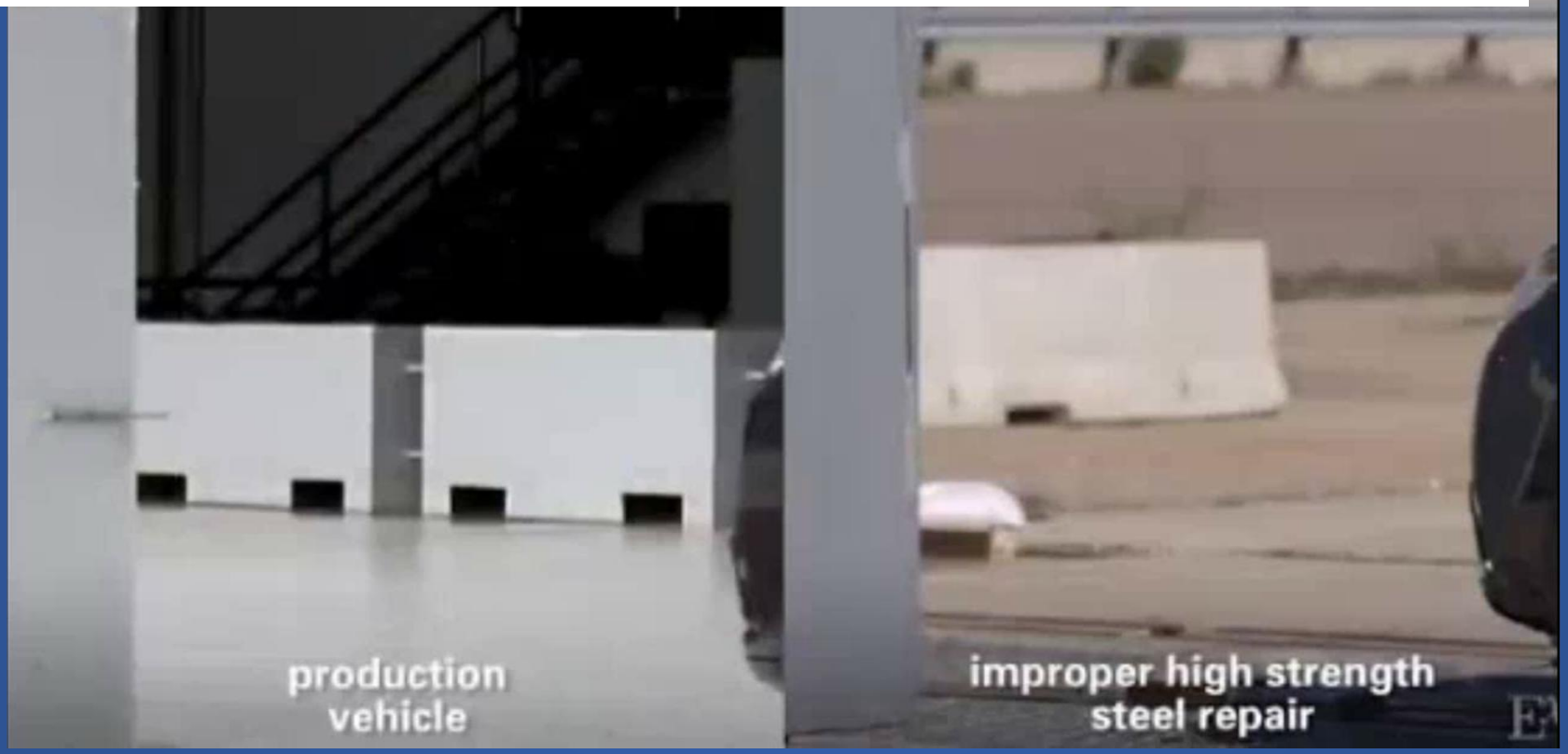
Finite Element Modeling Of Proper and Improper Structural Repairs



Finite Element Modeling Of Proper and Improper Structural Repairs



Crash Tests Comparing Proper and Improper Structural Repairs

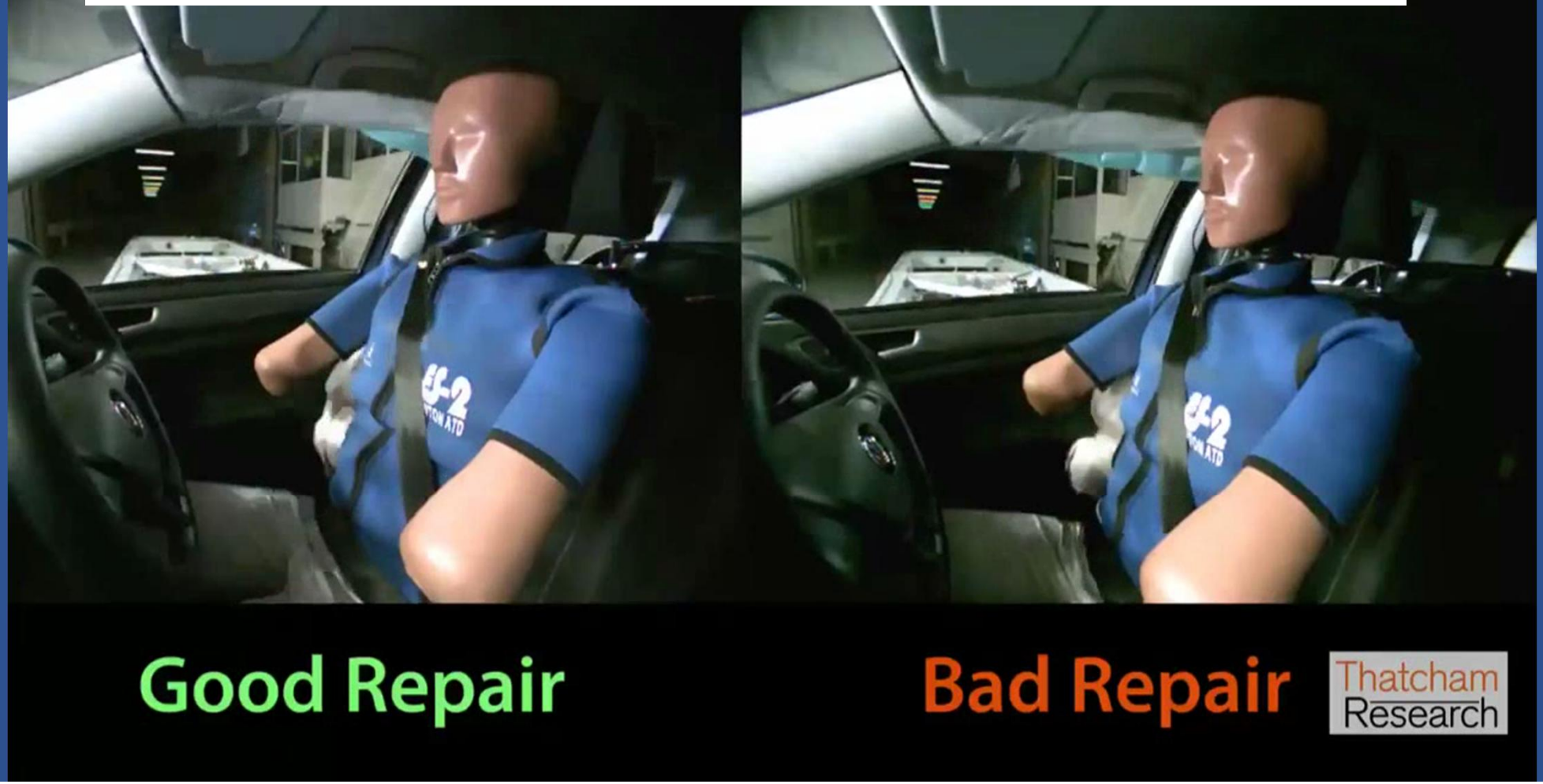


Improper Repair – Side Structure

POOR

GOOD

Improper Repair –Side Structure



When Vehicle Safety Professionals Do Their Jobs Right, Small Cars Are Just As Safe As Big Vehicles

When Vehicle Safety Professionals Do Their Jobs Right, Vehicles Can Drive Off Cliffs And No One Is Seriously Injured

When Vehicle Safety Professionals Do Their Jobs Right, Families Make It Home Safely

But there are insurance companies out there who refuse to let you vehicle safety professionals do your jobs because they hold the money and the power and they make you choose between who survives—

your company or your customer

This Should Enrage Your Industry, Your Company and You As A Vehicle Safety Professional Because There's A Legal and Moral Responsibility To Protect Your Customers' Safety

Raise Your Hand If The Insurance Companies Have Done The Following:

1. Forced You To Use Aftermarket Parts
2. Forced You To Use Repair Methods That Didn’t Meet OEM Specifications
3. Forced You To Take A Short Pay
4. Failed To Permit You To Be Paid For Pre and Post Scans or
5. Put their profit over safety

So, Are You Just Going To Sit There And Take It?

If Not, What Are You Going To Do About It?

Raise Your Hand If You Want To Join Our Fight To Rid Your Vehicle Repair Labs Of Insurance Companies

The credit belongs to the man in the arena, whose face is marred by dust, sweat and blood, who strives valiantly, who errs, who comes up short again, and again, because there is no effort without error and shortcoming....

The Time Is Right For A Vehicle Safety Industry Revolution Following A 42 Million Dollar Verdict That Happened Back in October 2017 And You Should Be Very Scared

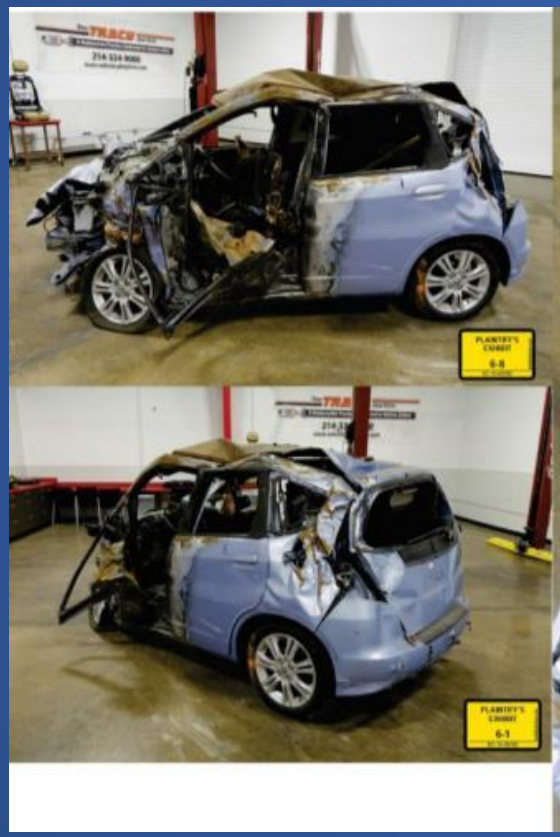
2010 Honda Fit

Post Accident

Driver Side Roof Separation

Passenger Side Roof Separation

We Examined The Collapse of the Safety Cage at Our Crash Lab



The Case Was Originally Filed As A Vehicle Crashworthiness Case Against Honda Because The Safety Cage Collapsed

Vehicle Crashworthiness

The science of preventing or minimizing serious injuries and death following an accident through the use of the vehicle’s safety systems

Vehicle Crashworthiness Principles

- Maintain Occupant Survival Space
- Manage, Distribute & Channel Collision Energy Away From Survival Space
- Provide Proper Restraint Throughout the Entire Accident
- Prevent Post-Crash Fires
- Prevent Ejection

But Something Was Wrong, We Had A Problem

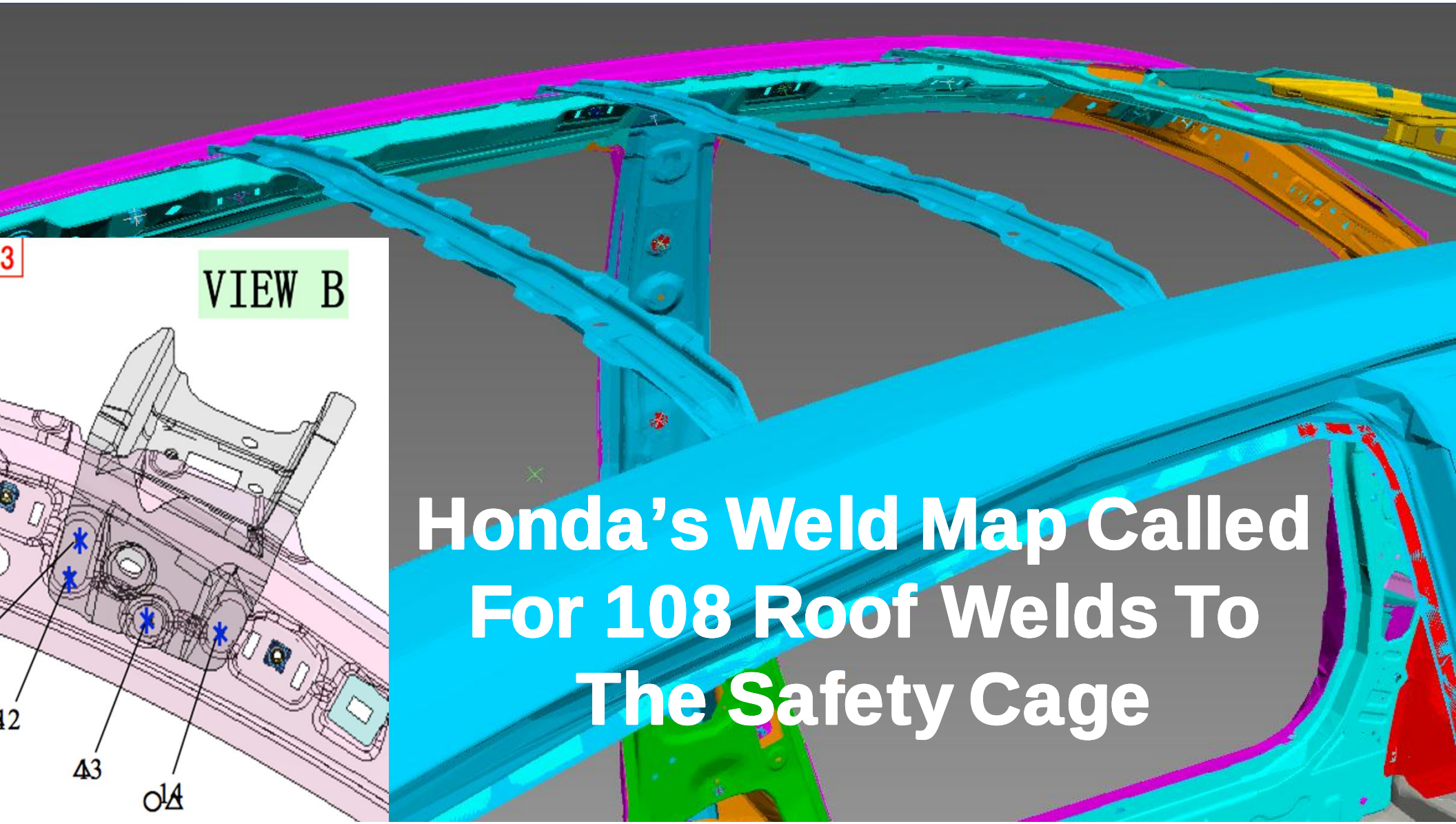
FANDANGO
MOVIECLIPS

OEM Roof Panels Don't Separate Like This....
PLAINTIFF'S EXHIBIT
6-12
DC-15-09782

Or like This…
PLAINTIFF'S
EXHIBIT
6-13
DC-15-09782

OEM Frame Members Underneath Occupants Don’t Collapse Like This…

So Why Did the Seebachan Safety Cage Collapse?



Honda’s Weld Map Called For 108 Roof Welds To The Safety Cage

2010 Honda Fit Roof

Using An Exemplar Roof, We Verified that the Honda Fit's Roof Was Supposed To Be Secured to the Safety Cage with 108 Welds

108 Welds Were Missing and the Glue Was Not Applied Properly

After Ruling Out A Design and Manufacturing Defect Case Against Honda, We Then Began Investigating Why The Honda Fit Had A NON-OEM Roof Installed

HUFFINES Since 1924
Huffines Kia Subaru Denton
ROB ROBERTSON
Internet Manager
5150 South I-35 exit 461
Denton, TX 76210
www.huffines.net
(940) 321-2504
Fax (940) 497-3714
Mobile (817) 875-4594
rob.robertson@huffines.net

y:
DENTON

SHOW ME THE CARFAX

CARFAX® Vehicle History Report™

US $39.99

An independent company established in 1986

Vehicle Information:
2010 HONDA FIT SPORT
VIN: JHMGE8H43AC006993
HATCHBACK 4 DR
1.5L L4 MPI SOHC 16V
FRONT WHEEL DRIVE
Standard Equipment | Safety Options

CARFAX Report Provided By:
HUFFINES KIA SUBARU - DENTON
5150 I 35 East
Denton, TX 76208
1-866-820-8705
www.usedcarstrucksdenton.com/preowned-inventory.aspx

- No accident / damage reported to CARFAX
- CARFAX 1-Owner vehicle
- **4** Service records available
- Personal vehicle
- **34,840** Last reported odometer reading
- **$380** Above retail book value

Based on the information reported to CARFAX, this vehicle is worth $380 more than the retail book value.

This CARFAX Vehicle History Report is based only on information added to CARFAX and available as of 8/27/13 at 11:56:07 AM (EDT). Other information about this vehicle, including problems, may not have been reported to CARFAX. Use this report as one important tool, along with a vehicle inspection and test drive, to make a better decision about your next used car.

CARFAX Price Calculator™

Adjust the value of this **2010 Honda Fit Sport** based on the information available in this report

1) Retail Book Value	2) CARFAX Price Adjustment™	3) Adjusted Retail Value
$ 0	+ $380	Begin by entering the retail book value
Enter retail book value here	Above retail book value	

Start by entering the retail book value from a pricing guide website.

This vehicle is worth more than average, based on information in this report.

Compare adjusted retail value to seller's asking price when making your decision.

CARFAX Ownership History

The number of owners is estimated

	Owner 1
Year purchased	2009
Type of owner	Person

PLAINTIFF'S EXHIBIT
207
DC-15-09782

CARFAX Detailed History

Glossary

Owner 1
Purchased: 2009
Type: Personal
Where: Texas
Est. miles/year: 9,561/yr
Est. length owned: 12/3/09 - 7/10/13 (3 yrs. 7 mo.)

Low mileage! This owner drove less than the industry average of 15,000 miles per year.

Date:	Mileage:	Source:	Comments:
11/09/2009	6	John Eagle Dealerships johneagle.com	Vehicle offered for sale
11/16/2009		John Eagle Dealerships johneagle.com	Pre-delivery inspection completed Maintenance inspection completed State inspection completed Window tint installed
11/18/2009		John Eagle Honda Dallas, TX 214-353-3500 eaglehonda.com	Vehicle sold
12/03/2009		Texas Motor Vehicle Dept. Dallas, TX	Title issued or updated First owner reported Titled or registered as
		Title #05751740139111711	personal vehicle Loan or lien reported
11/01/2010		Texas Motor Vehicle Dept. Dallas, TX Title #05751740139111711	Registration issued or renewed Loan or lien reported Passed safety inspection
08/11/2011		John Eagle Dealerships johneagle.com	Maintenance inspection completed
11/01/2011		Texas Motor Vehicle Dept. Dallas, TX Title #05751740139111711	Registration issued or renewed Loan or lien reported Passed safety inspection
12/27/2011	19,532	Texas Inspection Station Dallas, TX	Passed emissions inspection
10/22/2012	25,518	John Eagle Dealerships johneagle.com	Maintenance inspection completed Seat or seat upholstery repaired
11/01/2012		Texas Motor Vehicle Dept. Dallas, TX Title #05751740139111711	Registration issued or renewed Loan or lien reported Passed safety inspection
12/27/2012	28,692	Texas Inspection Station Dallas, TX	Passed emissions inspection
07/10/2013	34,839	Huffines Kia Denton, TX 940-321-2504 huffinesdenton.com	Vehicle offered for sale
07/19/2013		Huffines Kia Denton, TX 940-321-2504 huffinesdenton.com	Pre-delivery inspection completed Maintenance inspection completed Recommended maintenance performed Oil and filter changed Alignment performed State emissions inspection completed One tire mounted and balanced
07/19/2013		Texas Inspection Station Dallas, TX	Passed emissions inspection
08/02/2013	34,840	Dealer Inventory	Vehicle offered for sale

PLAINTIFF'S EXHIBIT
207 3&4
DC-15-09782

The CarFax Was Clean

So We Interviewed The Original Owner Who Informed Us He Had The Roof Replaced by John Eagle Collision Center Due to Hail Damage

JOHN EAGLE COLLISION CENTER

6125 PEELER ST. DALLAS, TX 75235 800.406.2344

CUSTOMER NO.	ADVISOR	TAG NO.	INVOICE DATE	INVOICE NO.
61637	ALISON HUBER 1681	1649	08/30/12	HOCB749800

DARYL SCROGGINS
6200 BRYAN PKWY
DALLAS, TX 75214-4302

LABOR RATE	LICENSE NO.	MILEAGE	COLOR	STOCK NO.
	BK35978	24,586	TIDWTR BLUE	H10-346

YEAR / MAKE / MODEL	DELIVERY DATE	DELIVERY MILES
10/HONDA/FIT/4DR HB L4 SPORT AT	11/18/09	6

VEHICLE I.D. NO.	SELLING DEALER NO.	PRODUCTION DATE
JHMGE8H43AC006993	P48926	

F.T.E. NO.	P.O. NO.	R.O. DATE
		07/17/12

RESIDENCE PHONE	BUSINESS PHONE	COMMENTS
214-821-9317	940-565-8387	E# L15A7-3856274 MO: 24586

LABOR & PARTS----------

J# 1 62H0Z BODY REPAIR PROCESS TECH(S):1712 1873 2916.90

BODY REPAIR PER ESTIMATE
COMPLETED BODY REPAIR PER ESTIMATE

PARTS	QTY	FP	NUMBER	DESCRIPTION	UNIT PRICE	
JOB # 1	1		80050-TK6-H00	LABEL 0000000	1.73	1.73
JOB # 1	1		38205-TK6-A00	LABEL, FU 0000000	2.02	2.02
JOB # 1	1		60100-TK6-A92ZZ	HOOD, ENG 0000000	282.43	282.43
JOB # 1	1		72410-TF0-003	MOLDING, 0000000	31.07	31.07
JOB # 1	1		72450-TF0-003	MOLDING, 0000000	31.07	31.07
JOB # 1	1		72910-TF0-003	MOLDING, 0000000	27.97	27.97
JOB # 1	1		72950-TF0-003	MOLDING, 0000000	27.97	27.97
JOB # 1	1		62100-TK6-A00ZZ	PANEL, RO 0000000	451.95	451.95
JOB # 1	1		17277-RP3-A01	LABEL,INF 0000000	4.23	4.23
JOB # 1	1		74222-TK6-A00	COVER 0000000	9.87	9.87
JOB # 1	1		74212-TK6-A00	COVER 0000000	8.20	8.20
JOB # 1	1		60261-TK6-A90ZZ	PANEL, L. 0000000	200.97	200.97
JOB # 1	1		73150-TF0-003	MLDG, FR. 0000000	30.98	30.98
JOB # 1	2		73127-TF0-000	RUBBER B, 0000000	3.78	7.56
JOB # 1	1		73126-TF0-000	RUBBER A, 0000000	5.70	5.70
JOB # 1	2		73129-TF0-000	RUBBER D, 0000000	6.03	12.06
JOB # 1	1		73128-TK6-000	RUBBER C, 0000000	14.12	14.12
JOB # 1	1		76730-S2Y-003	BLADE, UP 0000000	[illegible]	[illegible]

PROGRAM CODE	AUTHORIZATION NUMBER	COMMITMENT NUMBER

AUTHORIZED BY

PLAINTIFF'S EXHIBIT
18-1
DC-15-09782

Original Owner Repair Statement

After This Additional Investigation,
We Decided To Sue John Eagle Collision Center For Gluing The Roof On Rather Than Welding It To The Safety Cage

True 5. PEOPLE WHO TAKE THEIR VEHICLE TO A CERTIFIED HONDA BODY REPAIR SHOP LIKE JOHN EAGLE COLLISION CENTER, EXPECT THE CERTIFIED BODY SHOP WILL FOLLOW THE VEHICLE MANUFACTURER'S BODY REPAIR RULES.

True 6. A CERTIFIED HONDA BODY SHOP LIKE JOHN EAGLE COLLISION CENTER IS REQUIRED TO REPAIR VEHICLES BACK TO THE VEHICLE MANUFACTURER'S SAFETY SPECIFICATIONS.

True 8. IF A CERTIFIED BODY SHOP LIKE JOHN EAGLE COLLISION CENTER DOES NOT FOLLOW THE VEHICLE MANUFACTURER'S REPAIR RULES AND SOMEONE IS INJURED OR KILLED BECAUSE THOSE REPAIR RULES WERE NOT FOLLOWED, THE CERTIFIED BODY SHOP IS RESPONSIBLE FOR ALL OF THE HARMS AND LOSSES.

PLAINTIFF'S EXHIBIT
201-A
DC-15-09782

Sworn Testimony Truths By The Shop Director

Sworn Testimony Truths By The Shop Director

True 20. THE 2009-2013 HONDA FIT BODY REPAIR MANUAL WAS JOHN EAGLE'S BIBLE THAT THEY HAD TO FOLLOW.

True 21. JOHN EAGLE COLLISION CENTER VIOLATED HONDA'S 2009-2013 HONDA FIT BODY REPAIR MANUAL BY NOT WELDING THE ROOF TO THE SAFETY CAGE.

True 22. JOHN EAGLE COLLISION CENTER VIOLATED 3M'S DECEMBER 11, 2011 INFORMATION SHEET THAT SAYS TO NOT USE ADHESIVE ON HONDA PRODUCTS.

True 24. JOHN EAGLE COLLISON CENTER VIOLATED ICAR'S ALWAYS FOLLOW VEHICLE MAKER PROCEDURES.

PLAINTIFF'S EXHIBIT
201-C
DC-15-09782

****
ORAL DEPOSITION OF
BOYCE WILLIS
CORPORATE REPRESENTATIVE OF
JOHN EAGLE COLLISION CENTER,
JULY 7, 2017
****

17 the insurance company cannot trump the OEM
18 specifications, correct, sir?
19 A. Yes, they can.
20 Q. Where does it say that?
21 A. By not paying the bill.

Pg. 18 Line 17-21

This Sworn Testimony Angered The Jury

The $42,000,000.00 Difference

With Every Witness, We Talked About The Missing 108 Welds

With Every Witness We Talked About Glue

2009-2013 Honda Fit Body Repair Manual

INTRODUCTION

How to Use This Manual

This manual covers the repairs of a 2009-2013 model series Fit that have been involved in an collision, and it describes the work related to the replacement of damaged body parts.
Please read through these instructions and familiarize yourself with them before actually using this manual.
NOTE: Refer to the appropriate Fit Service Manual, for specifications, wire harness locations, safety stand support points, etc.

Special Information

⚠ WARNING

You CAN be KILLED or SERIOUSLY HURT if you don't follow instructions.

⚠ CAUTION

You CAN be HURT if you don't follow instructions.

NOTE: Gives helpful information.

⚠ CAUTION

Detailed descriptions of standard workshop procedures, safety principles and service operations are not included. Please note that this manual does contain warnings and cautions against some specific service methods which could cause PERSONAL INJURY, damage a vehicle, or make it unsafe. Please understand that these warnings cannot cover all conceivable ways in which service, whether or not recommended by Honda, might be done or of the possible hazardous consequences of each conceivable way, nor could Honda investigate all such ways. Anyone using service procedures or tools, whether or not recommended by Honda, must satisfy himself thoroughly that neither personal safety or vehicle safety will be jeopardized.

All information contained in this manual is based on the latest product information available at the time of printing. We reserve the right to make changes at any time without notice. No part of this publication may be reproduced, stored in retrieval system, or transmitted, in any form by any means, electronic, mechanical, photocopying, recording, or otherwise, without the prior written permission of the publisher. This includes text, figures and tables.

HONDA MOTOR CO., LTD.
Service Publication Office

1 General Information

2 Paint Information

3 *Replacement

4 Body Dimensional Drawings

5 Rust Prevention

General Safety Precautions

Reference

PLAINTIFF'S EXHIBIT
202
DC-15-09782

The 2009-2013 Honda Fit Body Repair Manual Revealed Crucial Information About the Proper Repair Procedures

Installation

NOTE:
- Welding symbols
  - ×: 2-Plate spot welding
  - ⊗: 3-Plate spot welding
  - ⊠: 4-Plate spot welding
  - ●: MIG plug welding
  - ⬬: MIG welding
  - L= Welding length Unit: mm (in.)
- ( ): The number of welds

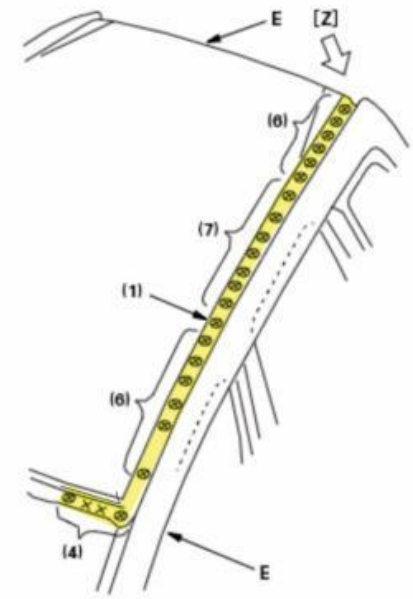
1. Clamp the new roof panel and install the roof arch gusset.

2. Check the body dimensions.
   - Windshield and door opening (see page 4-10)
   - Tailgate opening (see page 4-11)
   - Rear pillar gutter position (see page 4-9)
   - Passenger's compartment (see page 4-7)
   - Door hinge position (see page 4-6)

3. Tack weld the front and rear corner edges of the roof panel.

4. Temporarily install the roof molding, the windshield, the tailgate and the door, then check for differences in level and clearance.
   Check the external parts fitting position (see page 4-12). Make sure the body lines flow smoothly.

5. Do the main welding.
   - From inside the vehicle, weld the front roof rail (A) and the inner upper extension (B).
   - Fix the rear roof rail (C) with the mounting bolts (D).
   - Weld the front, rear, and side flange of the roof panel (E).
   - The roof area must be free of burrs and/or sharp edges to prevent damage to the side curtain airbag during deployment.



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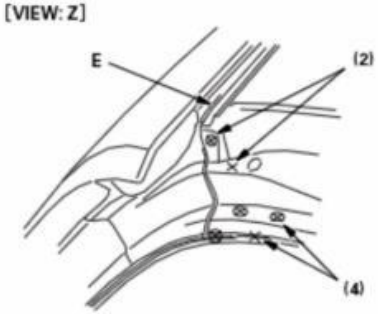

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202 3-33
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Honda Required 108 Roof Welds For A New Roof

Always Follow Vehicle Maker Procedures

Posted on July 07, 2016 | Share: | Print

We often receive Ask I-CAR inquiries asking: "what does I-CAR recommend?" Many times these questions are in regards to sectioning, straightening, or part replacement/attachment methods. Our first response is always:

"Follow the vehicle maker procedures."

It is important to note that the procedures provided by the vehicle maker are service specifications, not recommendations. Think of these procedures as no different than service information for transmission or engine repair, where specific procedures must be followed in the proper order.

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I-CAR Says To Always Follow OEM Repair Specifications

I-CAR Reminds Repair Shops That Families Ride In Vehicles They Repair

I-CAR

EDUCATION, KNOWLEDGE AND SOLUTIONS FOR THE COLLISION REPAIR INDUSTRY.

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- I-CAR History & Journey
- Vision, Mission & Values
- Giving Back to the Industry
- Learning Culture
- Value of I-CAR Training
  - Complete, Safe and Quality Repairs
  - Gold Class White Paper
  - Technical Tsunami
  - Business Performance
  - Risk Reduction
  - Career Development
- Governance
  - Board of Directors
    - Board Committees

Home / About Us / Value of I-CAR Training / Complete, Safe and Quality Repairs

Complete, Safe and Quality Repairs

Your customers are the lifeblood of your business. When they entrust you with their vehicle repairs, they are putting their lives – and the lives of their loved ones – in your hands.

Don't let them down. Make sure your customers drive off in a properly repaired vehicle, every time.

The key to complete, safe and quality repairs lies in the knowledge and training of collision repair technicians. Insurance automotive physical damage appraisers play a critical role as well.

That's why I-CAR training is so important. We are a complete resource for collision repair training, from entry level to advanced. Work with us to help bring the industry closer to the I-CAR vision that every person in the collision repair industry has the information, knowledge and skills to perform complete, safe and quality repairs for the ultimate benefit of the customer.

To learn more about I-CAR, visit our About Us page.

CLASS SEARCH

Choose a class

ZIP Code

SEARCH

Advanced Search

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300
DC-15-09782

Quality Guarantee

From laser diagnostics, which is used to evaluate frame integrity, to our multi-step quality control process, our goal is to achieve "better than new". We consider anything less "not good enough". All repairs are backed with a lifetime workmanship guarantee.

National Institute for AUTOMOTIVE SERVICE EXCELLENCE

John Eagle Collision Center
910 Highway 6 South
Houston, Texas 77079
281-589-2639

Open Monday thru Friday
7am to 6pm
Saturday 8am to Noon

We Exposed John Eagle Website Claims As False

PLAINTIFF'S EXHIBIT
200
DC-15-09782

3M

Thursday, December 22, 2011

Regarding Roof Skin Bonding

The use of adhesives in attaching non-structural exterior panels in a repair setting has been well established and accepted as industry practice for over ten years in the United States. In addition to the standard/obvious panel bonding benefits (ease of use, equipment access, corrosion protection, seam sealing, stress distribution, etc.), the fact that dropping the headliner and extreme measures for protecting interior

- Ford

Honda/Acura recommends to "repair at factory seams with the same procedure as the factory assembly process except where specified otherwise in the Honda And Acura Body Repair Manuals. Please note that the door skin is welded at the top of the skin, and is glued around the crimp."

General Motors technical service bulletin #02-08-98-001, GM provides specific recommendations regarding the use of adhesive on roof panels, door skins, quarter panels, and rear body panels on specific vehicles. Using adhesives on GM vehicles without specific procedures is a business decision.

Weld-bonding is also another method of panel replacement that may be recommended by the vehicle maker. Weld-bonding is the combination of using STRSW or GMA (MIG) plug welds along with adhesive to attach an exterior body panel.

When weld-bonding, DaimlerChryler recommends "to replace any suspected adhesive with a two-component, corrosion inhibiting, epoxy structural adhesive when any repairs are made, providing the STRSW process is applicable. The adhesive must meet or exceed Chrysler MS CD507."

Vehicle makers that have specific recommendations against the use of adhesives on their vehicles include:

- *Toyota*
- *Ford*

Honda/Acura recommends to "repair at factory seams with the same procedure as the factory assembly process except where specified otherwise in the Honda And Acura Body Repair Manuals. Please note that the door skin is welded at the top of the skin, and is glued around the crimp."

As previously mentioned, using adhesives on any vehicle not discussed in this section is a business decision. It is important to note, however, that almost all vehicle makers allow the use of adhesive for installing door skins.

but also in their Adhesive Bonding (ADH01) training course, where they specifically call out bonding for roof skin replacement on Screen A4 of Module 2.

The Glue Manufacturer That John Eagle Used Knew That Honda Required Welding

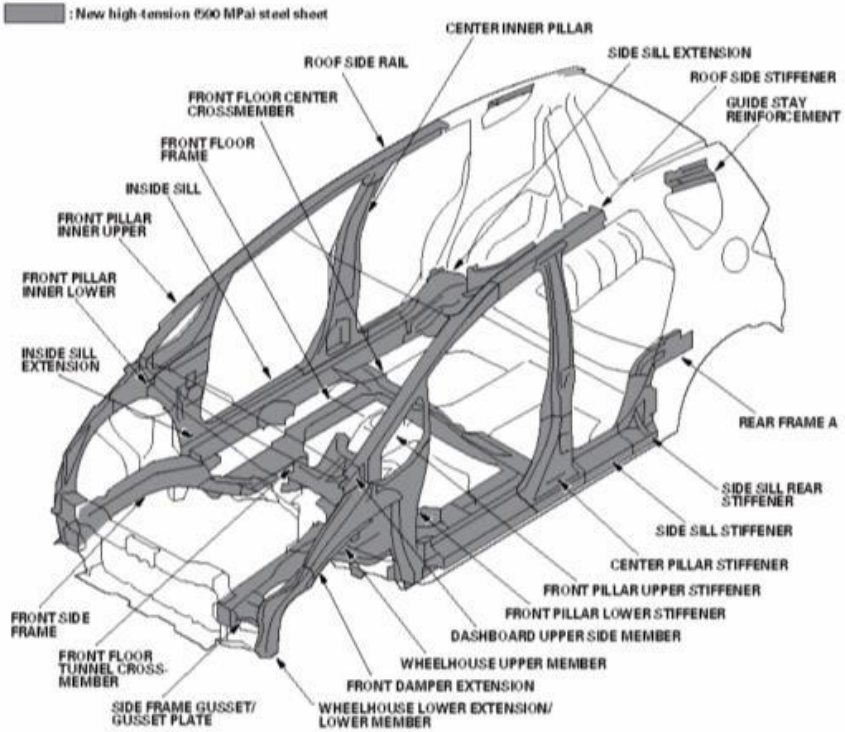
We Tried The Case Like It Was A Vehicle Crashworthiness Case

General Information

High-tension Steel Sheet Framed Area

The new high-tension steel sheet has greater tensile strength than conventional high-tension steel sheet. Although it's a thinner sheet, it is as strong as the previous thicker ones. Because the manufacturing press process has improved, its usage has expanded. For this vehicle, the new high-tension steel sheet is used for its main frame and its cabin structure to make this model lightweight and to improve the high-crush absorption frame.

: New high-tension 590 MPa steel sheet



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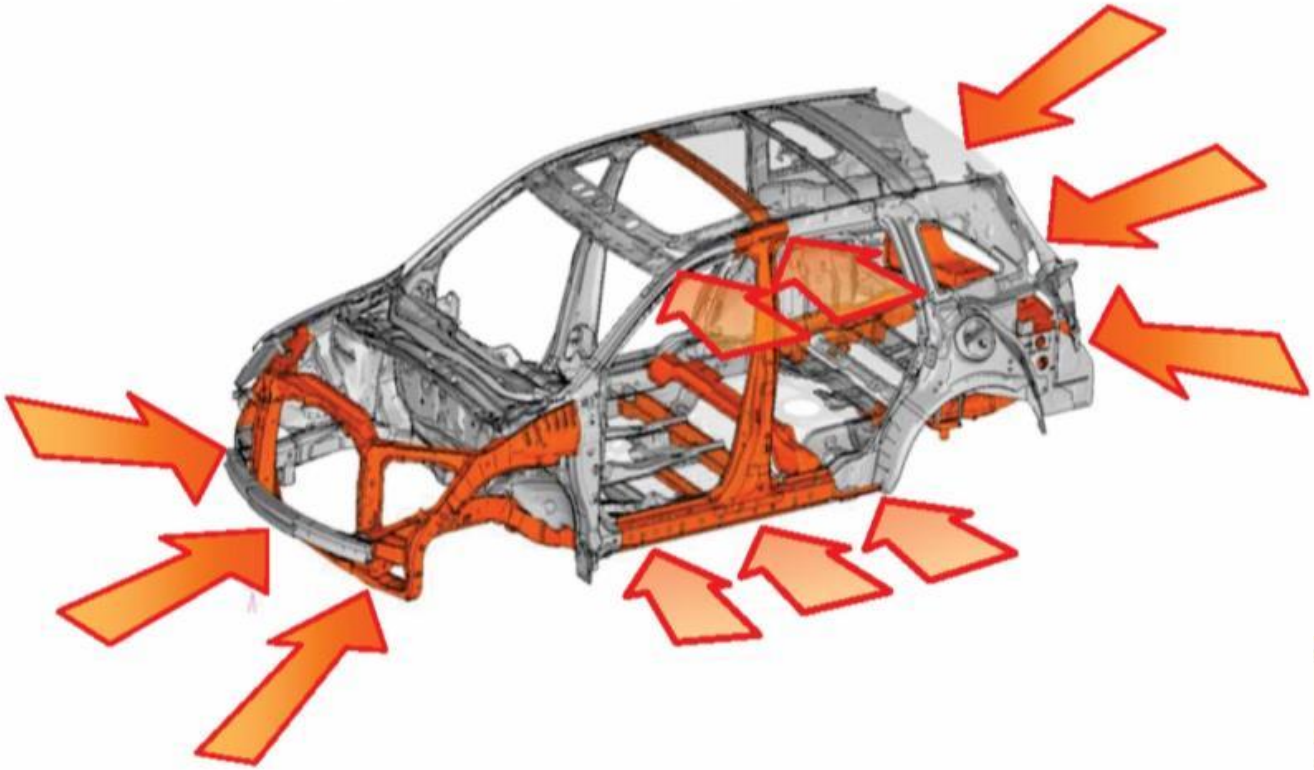
202 1-20
DC-15-09782

HONDA Technical Challenge

Create 360º Safety Cage

By optimizing Materials and Design

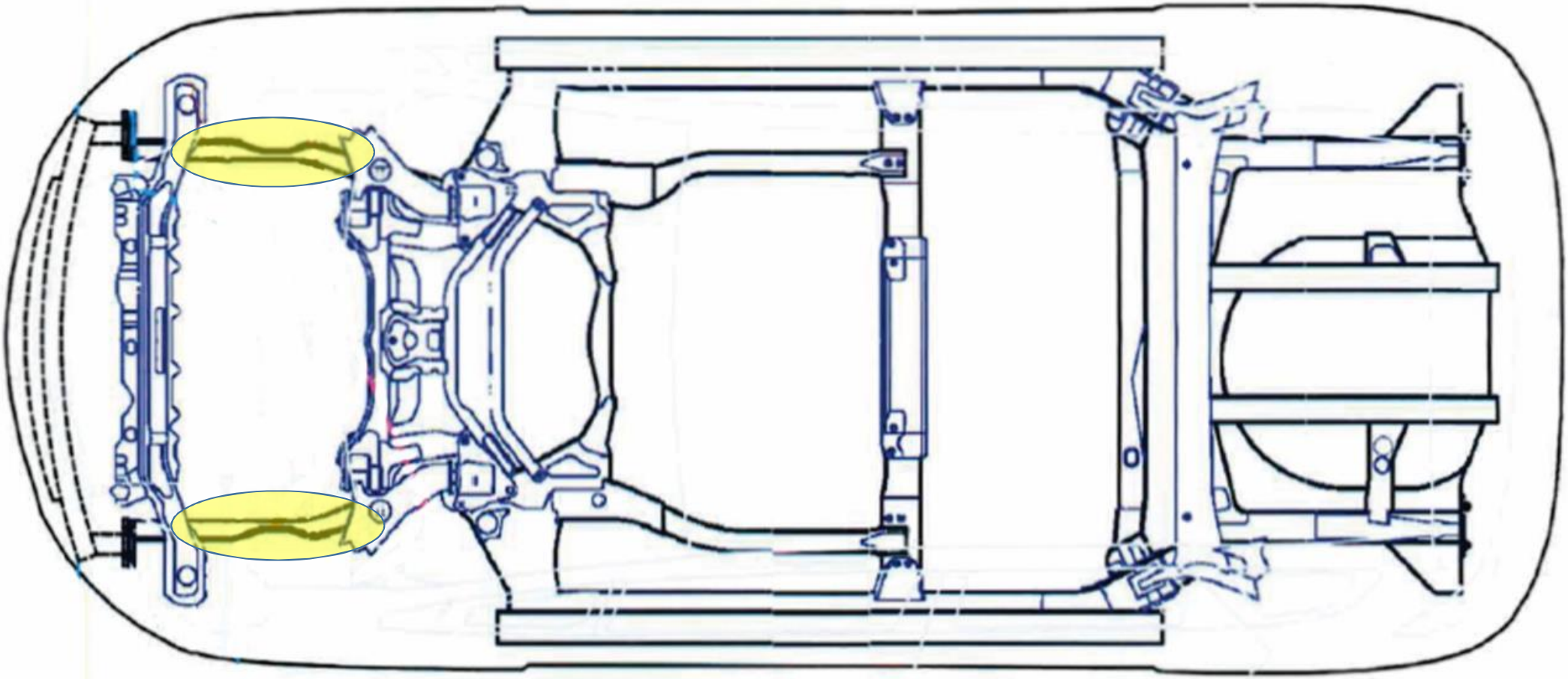


PLAINTIFF'S EXHIBIT
24-A 10
DC-15-09782

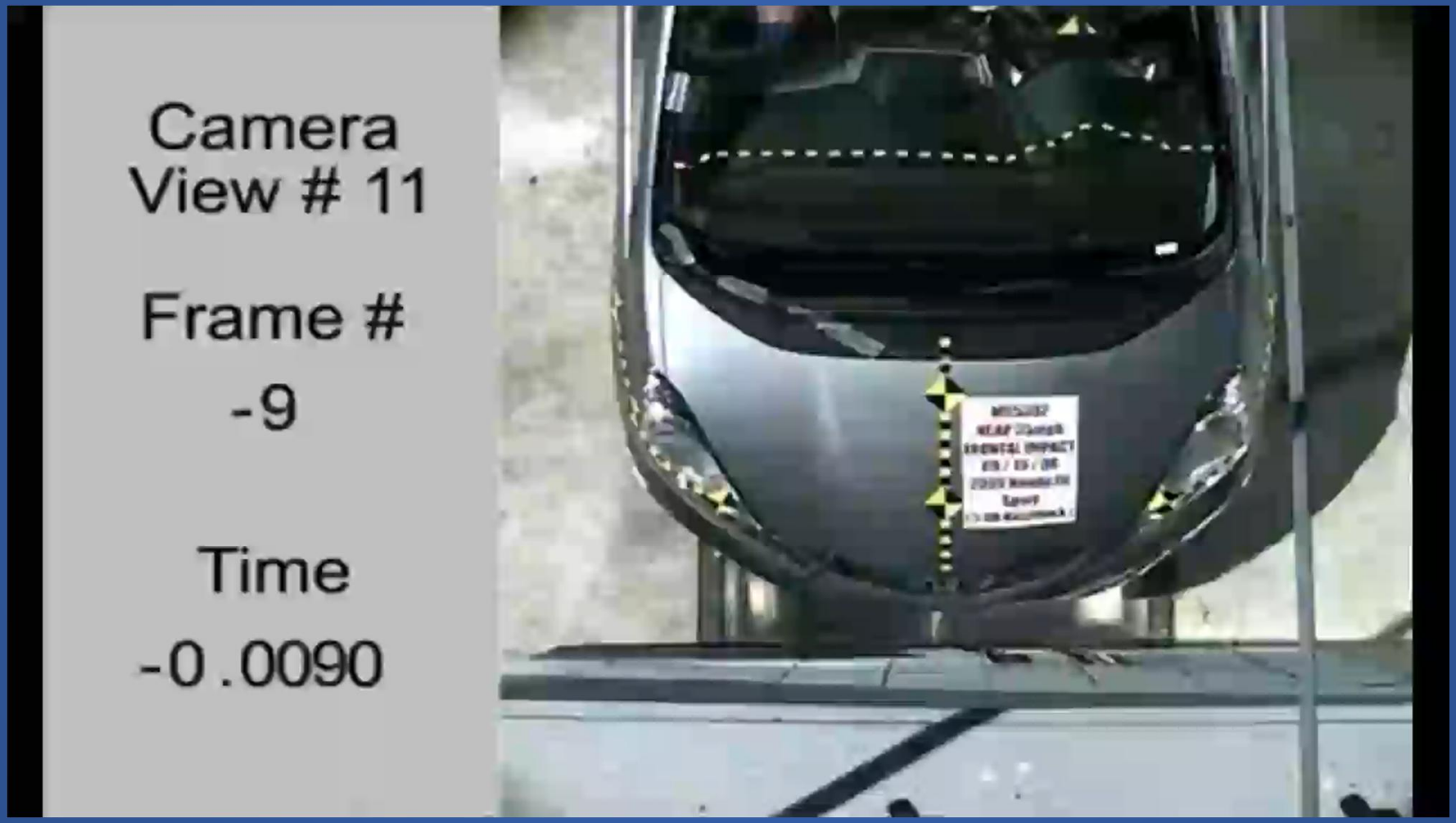
The Safety Cage Provides Occupant Protection In All Accidents

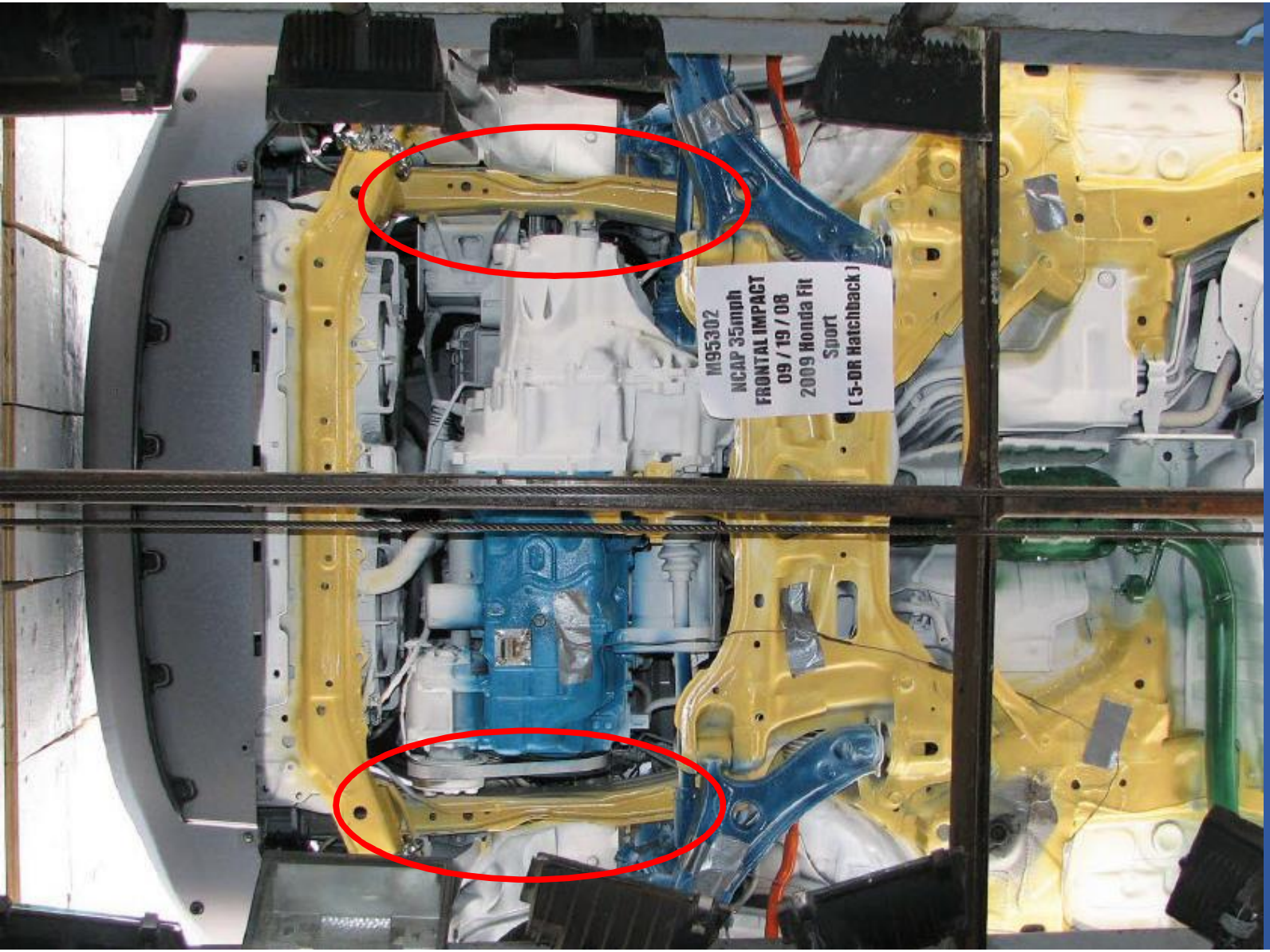
This structure is NOT designed to crush

Frame Rails – Designed Crush Zone

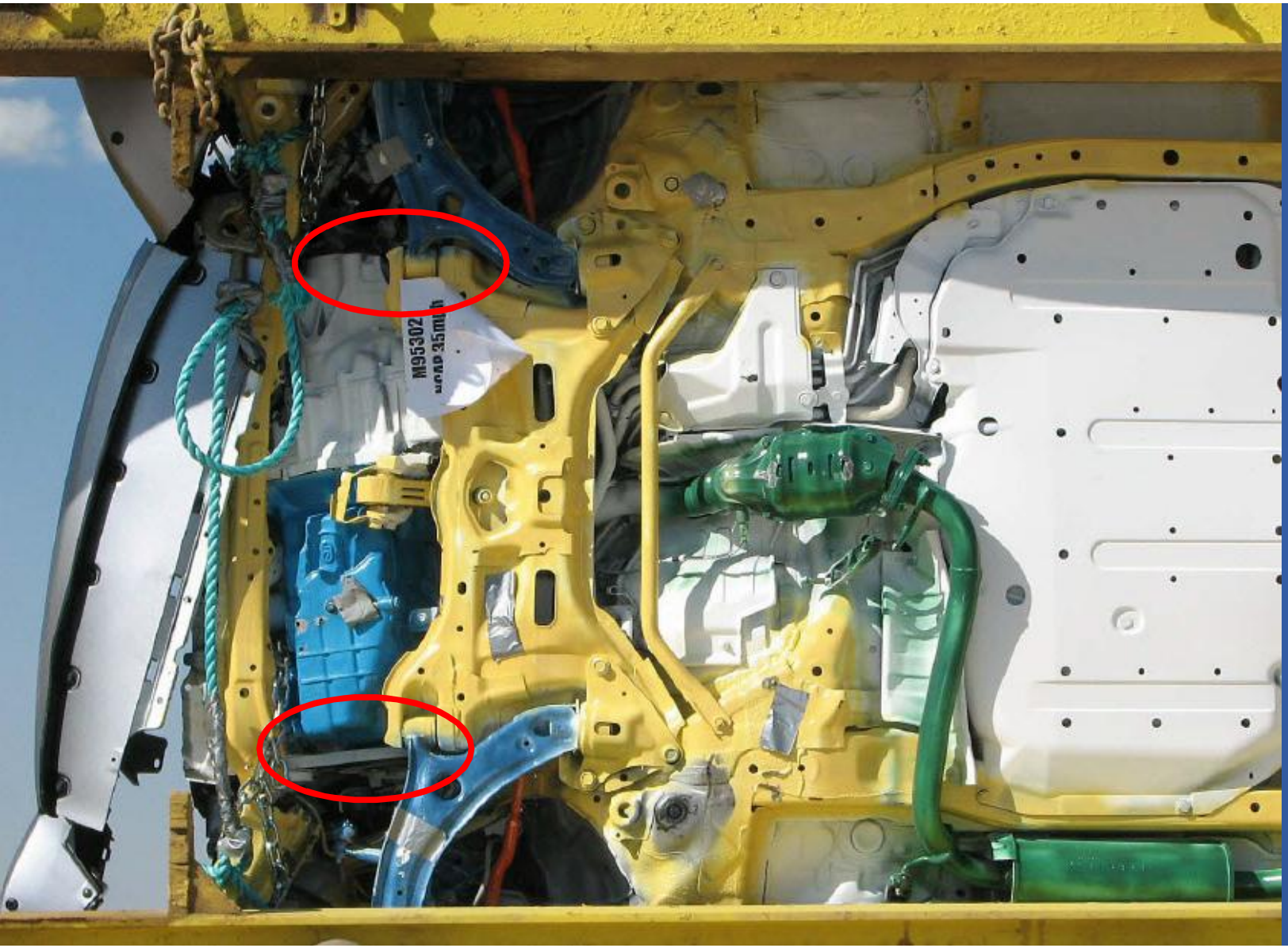


NCAP Full Frontal Barrier Test





NCAP Pre-Test



NCAP Post Test

In the Seebachan accident, the left and right frame rails of the Honda between the front bumper and the firewall did not permanently crush, deform, shorten or bend.

Tonda
True / False

Hannemann
True / False

Ziejewski
True / False

Smock
True / False
NOT QUALIFIED

Blaisdell
True / False

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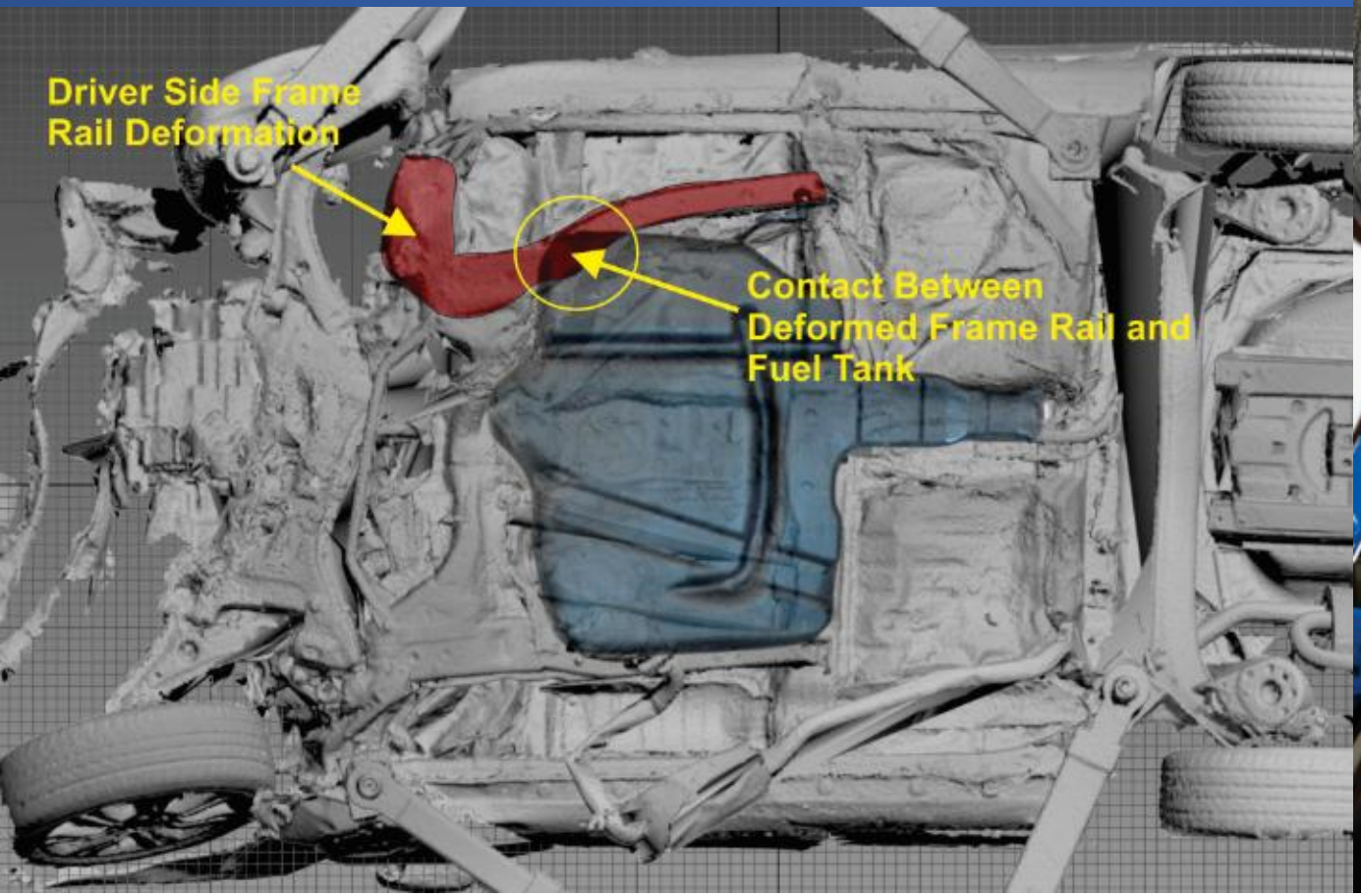
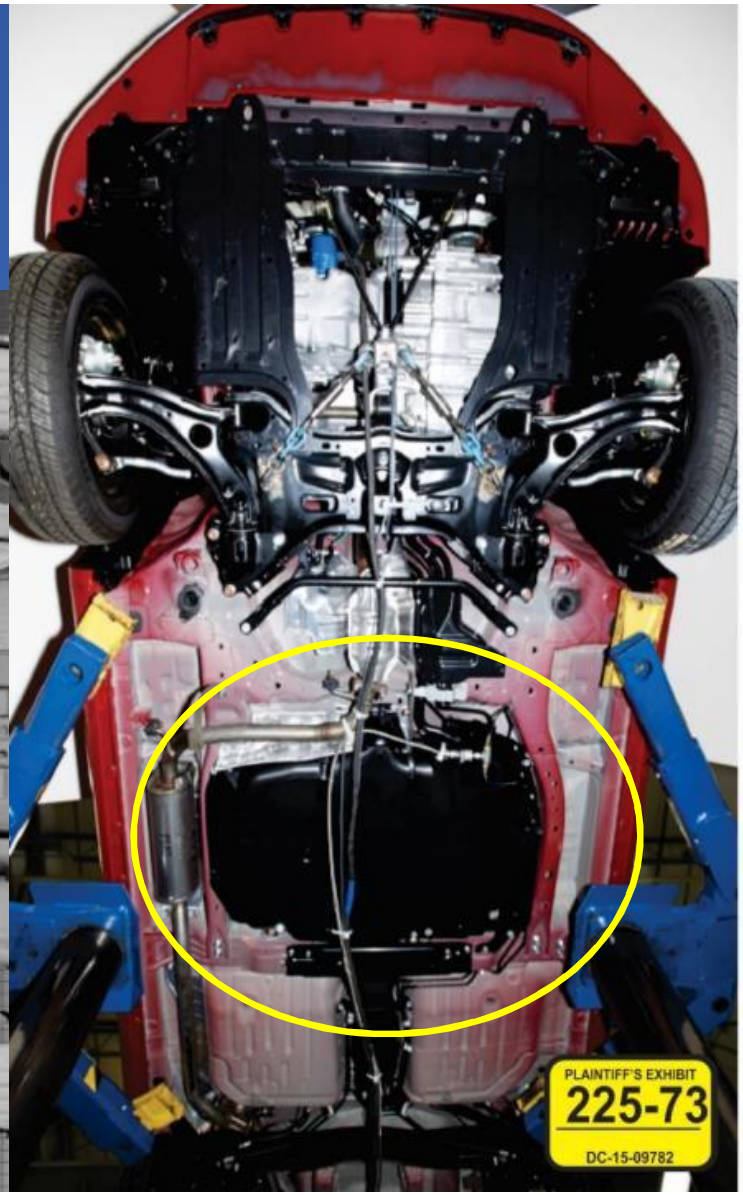
301
DC-15-09782

Expert Testimony and Analysis

There Are Consequences To Faulty Repairs

Faulty Repair = Fuel Tank Puncture





By Dictating Improper Vehicle Repairs For Decades, Insurance Companies Have Killed Thousands of Customers Who Were Driving Around In Timebombs And Don’t You Think For A Second That The Insurance Industry Didn’t Know About These Deaths

Each One of These Victims Was A Needless Angel In Heaven

Faulty Repairs Can Do This To Your Customers

And This

csn: 54228994 mr#: 90922819 har: 100079929
SEEBACHAN,MATTHEW
6/25/1980 (33 yrs) svc: PMR
attn:KOWALSKE, KAREN
Date
Depth
PRISM
MEDICAL PRODUCTS
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(f) (800) 975-6321
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SINGLE USE ONLY

What Did Not Work for John Eagle Collision Center At Trial

Always Follow Vehicle Maker Procedures

Posted on July 07, 2016 | Share: | Print

We often receive Ask I-CAR inquiries asking: "what does I-CAR recommend?" Many times these questions are in regards to sectioning, straightening, or part replacement/attachment methods. Our first response is always:

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PLAINTIFF'S EXHIBIT 233 DC-15-09782

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Suggested The OEM Specifications Were Just Recommendations Which Was Clearly Wrong

Bonding Is More Expensive Than Welding Wrong

Everybody is Bonding Metal Now Wrong

HONDA **Body Repair News**

Applies To: **2015 Fit Model Series** – ALL **April 2014**

2015 Fit: New Model Body Repair Information

DISCLAIMER: This publication contains a summary of new body and vehicle technology that may affect collision and other body repairs. Always refer to the appropriate service and body repair manuals for complete repair information. A subscription may be purchased at: techinfo.honda.com

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New Model Body Technology	Page 2
Body Repair Information	Page 5
Welding Precautions and Information	Page 6
Airbag System Components and Repairs	Page 8
Electrical Repair Information	Page 10

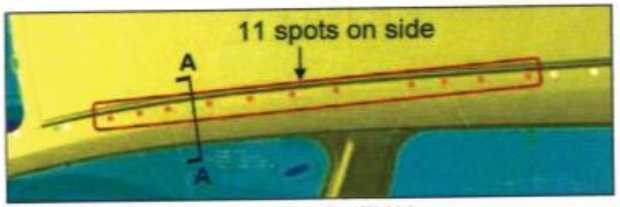
OVERVIEW OF BODY FEATURES

1. Next-Generation Advanced Compatibility Engineering™ (ACE™) body structure.
2. Platform (underbody and chassis) weight reduced by 57 pounds due to the extensive use of high and ultra-high strength steel, including 27% in grades 780, 980, and 1,500 MPa.
3. 4-plate spot welding in roof panel attachment area.

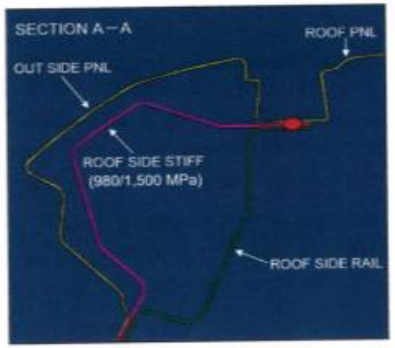
4-PLATE SPOT WELDED ROOF PANEL ATTACHMENT

The body of this vehicle is assembled using new technology that welds the entire inner framework before the pre-welded outer body panels are attached. This creates a unique 4-plate spot weld at the roof panel side flanges.

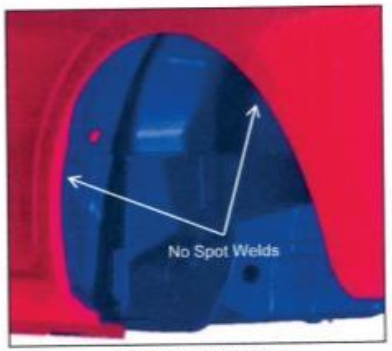
- Squeeze-type resistance spot welding (STRSW) is the required repair method because one of the 4 plates is constructed of 980 and 1,500 MPa steel (depending on location).
- Any squeeze-type resistance spot welder meeting the specifications published in the body repair manual can make this 4-plate spot weld.
- Refer to body repair manual section "Roof Panel Removal and Installation" for complete information.



Roof Panel 4-Plate Spot Weld Area



Roof Panel Section A - A



Rear Wheel Arch Area

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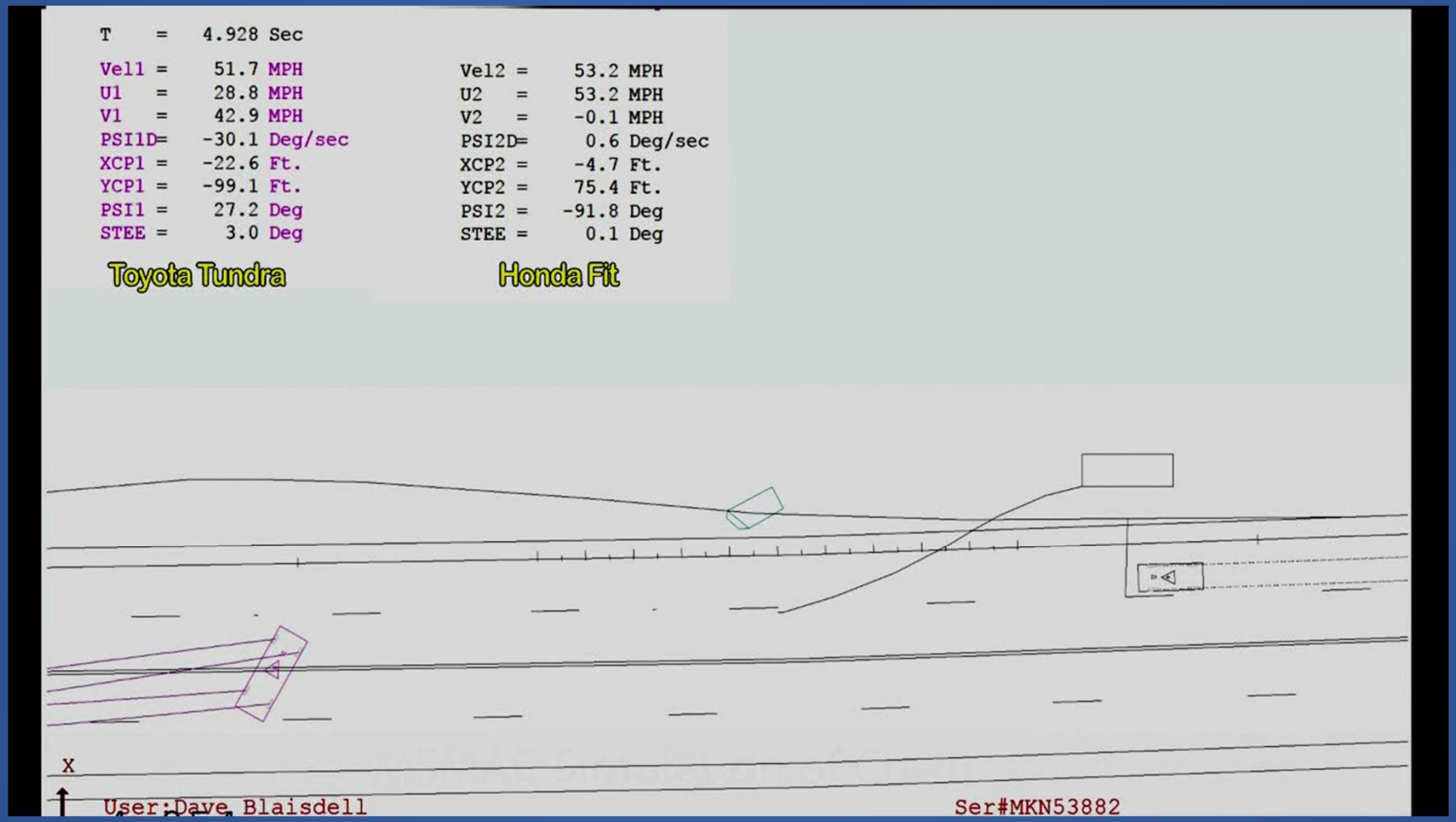
204-4
DC-15-09782

Never a Good Idea to Get Caught Lying To The Jury

Don’t Get Caught Manipulating Data



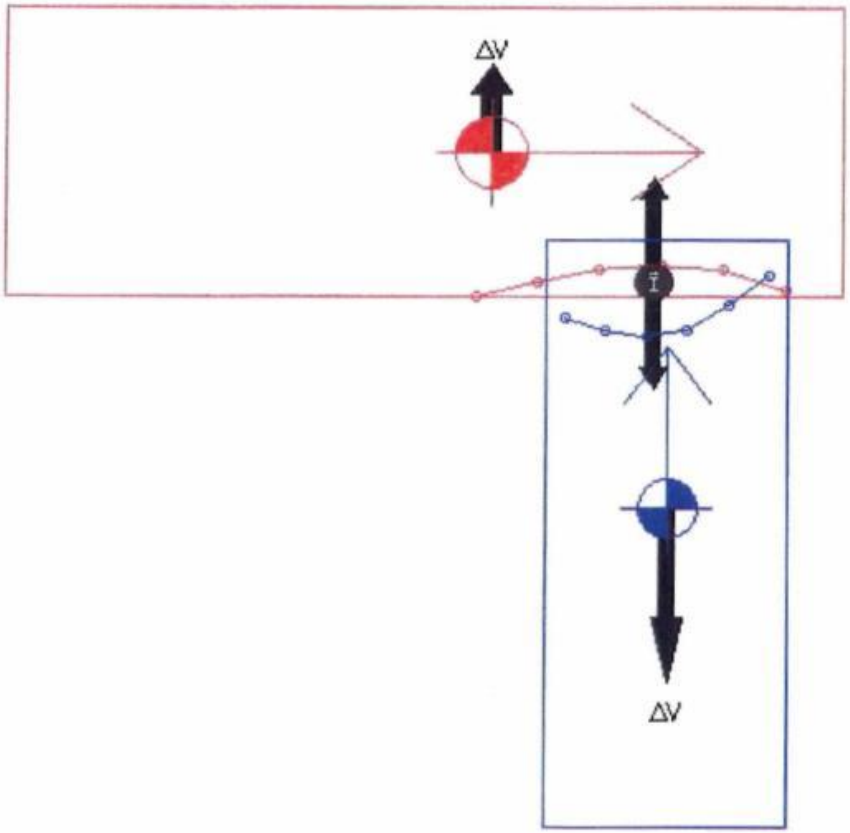
A Roof is NOT a Structural Member Wrong

A Simple Exhibit Destroyed That Theory

What's Missing?

We Proved The Defense Delta Velocity Would Have Paralyzed The Driver of the Toyota, Yet He was Uninjured Just Like His 13 Month Old Son Sitting Closest To The Impact

DOSBox SVN_MB6, CPU speed: 3000 cycles, Frameskip 0, Program: EDCRASH



EDCRASH
At Impact

	Veh #1	Veh #2
Delta-V (mph) (BASIS: Damage)		
	0.0	-39.5
	-18.7	0.0
	18.7	39.5
	90.0	-0.0

PLAINTIFF'S EXHIBIT
237-14
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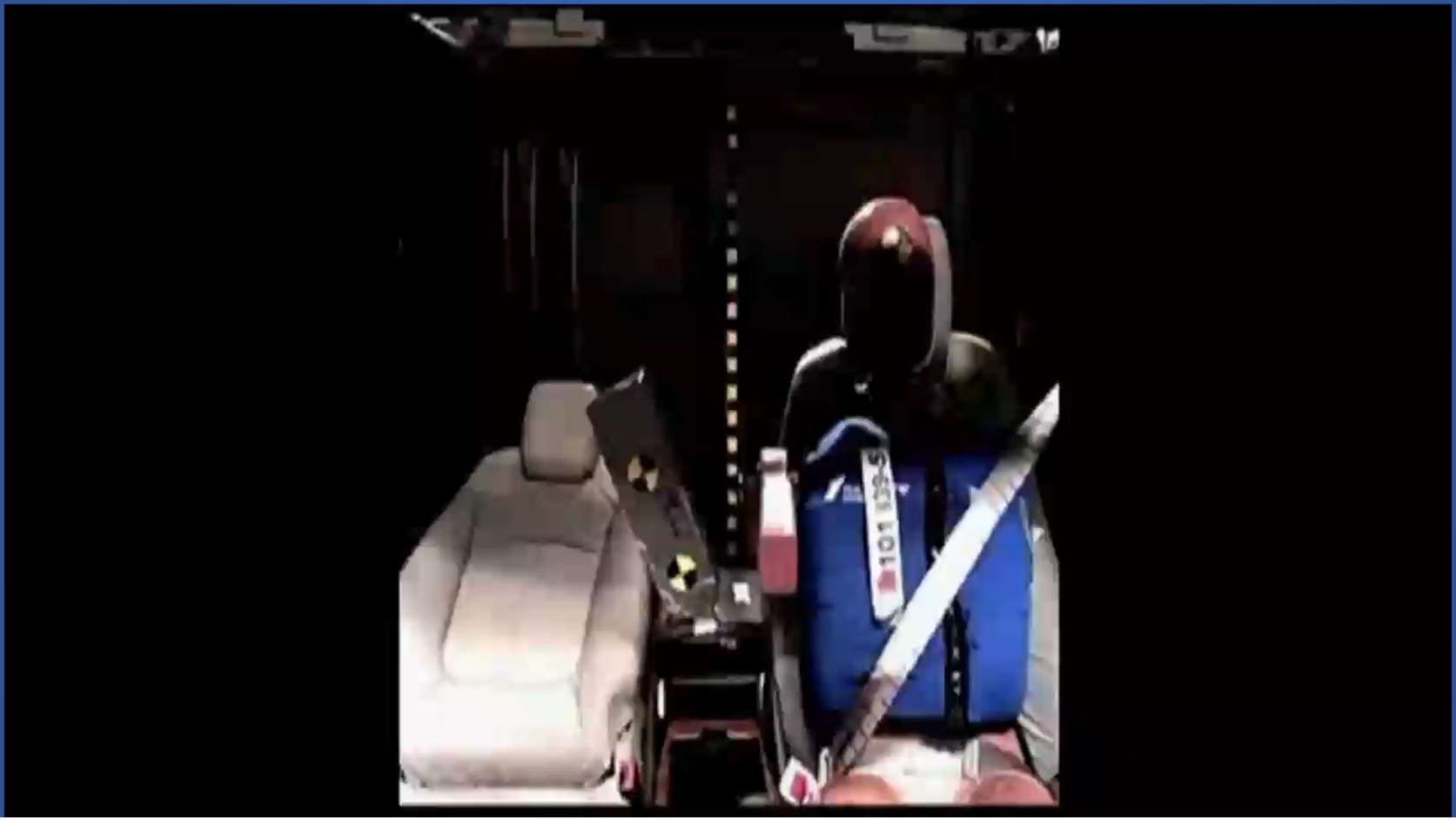
In An 18mph Delta Velocity Impact, The Far Side Occupant Rolls Out of Their Seatbelt and Suffers Paralyzing Injuries



10 Ways To Avoid A $42,000,000.00 Verdict

2009-2013 Honda Fit Body Repair Manual

INTRODUCTION

How to Use This Manual

This manual covers the repairs of a 2009-2013 model series Fit that have been involved in an collision, and it describes the work related to the replacement of damaged body parts.
Please read through these instructions and familiarize yourself with them before actually using this manual.
NOTE: Refer to the appropriate Fit Service Manual, for specifications, wire harness locations, safety stand support points, etc.

Special Information

⚠ WARNING

You CAN be KILLED or SERIOUSLY HURT if you don't follow instructions.

⚠ CAUTION

You CAN be HURT if you don't follow instructions.

NOTE: Gives helpful information.

⚠ CAUTION

Detailed descriptions of standard workshop procedures, safety principles and service operations are not included. Please note that this manual does contain warnings and cautions against some specific service methods which could cause PERSONAL INJURY, damage a vehicle, or make it unsafe. Please understand that these warnings cannot cover all conceivable ways in which service, whether or not recommended by Honda, might be done or of the possible hazardous consequences of each conceivable way, nor could Honda investigate all such ways. Anyone using service procedures or tools, whether or not recommended by Honda, must satisfy himself thoroughly that neither personal safety or vehicle safety will be jeopardized.

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1 General Information
2 Paint Information
3 *Replacement
4 Body Dimensional Drawings
5 Rust Prevention
General Safety Precautions
Reference

PLAINTIFF'S EXHIBIT
202
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1. Always Follow OEM Repair Specifications

Always Follow Vehicle Maker Procedures

Posted on July 07, 2016 | Share: | Print

We often receive Ask I-CAR inquiries asking: "what does I-CAR recommend?" Many times these questions are in regards to sectioning, straightening, or part replacement/attachment methods. Our first response is always:

I-CAR REPAIRABILITY TECHNICAL SUPPORT

PLAINTIFF'S EXHIBIT 233 DC-15-09782

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2. Always Follow I-CAR

I-CAR

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- Learning Culture
- Value of I-CAR Training
  - Complete, Safe and Quality Repairs
  - Gold Class White Paper
  - Technical Tsunami
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  - Risk Reduction
  - Career Development
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Complete, Safe and Quality Repairs

Your customers are the lifeblood of your business. When they entrust you with their vehicle repairs, they are putting their lives – and the lives of their loved ones – in your hands.

Don't let them down. Make sure your customers drive off in a properly repaired vehicle, every time.

The key to complete, safe and quality repairs lies in the knowledge and training of collision repair technicians. Insurance automotive physical damage appraisers play a critical role as well.

That's why I-CAR training is so important. We are a complete resource for collision repair training, from entry level to advanced. Work with us to help bring the industry closer to the I-CAR vision that every person in the collision repair industry has the information, knowledge and skills to perform complete, safe and quality repairs for the ultimate benefit of the customer.

To learn more about I-CAR, visit our About Us page.

CLASS SEARCH

Choose a class

ZIP Code

SEARCH

Advanced Search

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300
DC-15-09782

3. You Hold Your Customers' Lives In Your Hands

4. If There Are No OEM Repair Specifications, Research How To Make The Repairs, Keep Records, and Keep Your Customer Informed

KEEP RECORDS! ← DATA QUALITY

KEEP RECORDS! ← ACCURACY

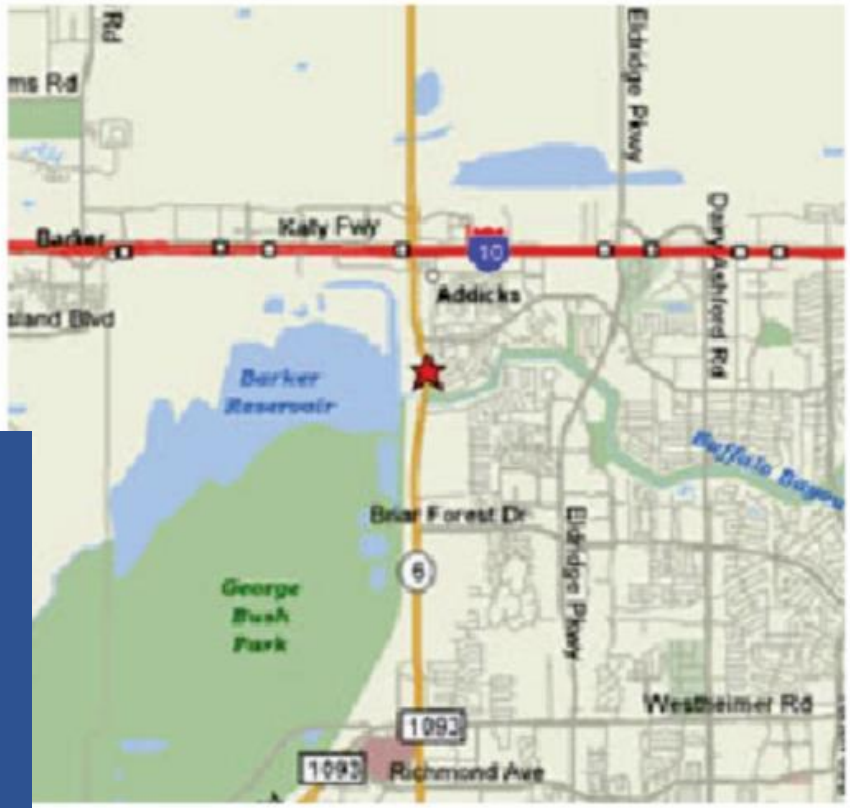
KEEP RECORDS! ← INTEGRITY

Quality Guarantee

From laser diagnostics, which is used to evaluate frame integrity, to our multi-step quality control process, our goal is to achieve "better than new". We consider anything less "not good enough". All repairs are backed with a lifetime workmanship guarantee.

National Institute for AUTOMOTIVE SERVICE EXCELLENCE

John Eagle Collision Center
910 Highway 6 South
Houston, Texas 77079
281-589-2639



5. Never Over-Promise By Poor Communication

CARFAX Detailed History

Glossary

Owner 1

Purchased:	2009
Type:	Personal
Where:	Texas
Est. miles/year:	9,561/yr
Est. length owned:	12/3/09 - 7/10/13 (3 yrs. 7 mo.)

Low mileage! This owner drove less than the industry average of 15,000 miles per year.

Date:	Mileage:	Source:	Comments:
11/09/2009	6	John Eagle Dealerships johneagle.com	Vehicle offered for sale
11/16/2009		John Eagle Dealerships johneagle.com	Pre-delivery inspection completed Maintenance inspection completed State inspection completed Window tint installed
11/18/2009		John Eagle Honda Dallas, TX 214-353-3500 eaglehonda.com	Vehicle sold
12/03/2009		Texas Motor Vehicle Dept. Dallas, TX Title #05751740139111711	Title issued or updated First owner reported Titled or registered as personal vehicle Loan or lien reported
11/01/2010		Texas Motor Vehicle Dept. Dallas, TX Title #05751740139111711	Registration issued or renewed Loan or lien reported Passed safety inspection
08/11/2011		John Eagle Dealerships johneagle.com	Maintenance inspection completed
11/01/2011		Texas Motor Vehicle Dept. Dallas, TX Title #05751740139111711	Registration issued or renewed Loan or lien reported Passed safety inspection
12/27/2011	19,532	Texas Inspection Station Dallas, TX	Passed emissions inspection
10/22/2012	25,518	John Eagle Dealerships johneagle.com	Maintenance inspection completed Seat or seat upholstery repaired
11/01/2012		Texas Motor Vehicle Dept. Dallas, TX Title #05751740139111711	Registration issued or renewed Loan or lien reported Passed safety inspection
12/27/2012	28,692	Texas Inspection Station Dallas, TX	Passed emissions inspection
07/10/2013	34,839	Huffines Kia Denton, TX 940-321-2504 huffinesdenton.com	Vehicle offered for sale
07/19/2013		Huffines Kia Denton, TX 940-321-2504 huffinesdenton.com	Pre-delivery inspection completed Maintenance inspection completed Recommended maintenance performed Oil and filter changed Alignment performed State emissions inspection completed One tire mounted and balanced
07/19/2013		Texas Inspection Station Dallas, TX	Passed emissions inspection
08/02/2013	34,840	Dealer Inventory	Vehicle offered for sale

PLAINTIFF'S EXHIBIT
207 3&4
DC-15-09782

6. If Your Shop Makes Repairs, Report The Repairs So That Future Owners Know The Whole Truth

****
ORAL DEPOSITION OF
BOYCE WILLIS
CORPORATE REPRESENTATIVE OF
JOHN EAGLE COLLISION CENTER,
JULY 7, 2017
****

17 the insurance company cannot trump the OEM
18 specifications, correct, sir?
19 A. Yes, they can.
20 Q. Where does it say that?
21 A. By not paying the bill.

Pg. 18 Line 17-21

7. NEVER Put Profits Over Your Customers' Safety

teldar
ANNUAL STOCKHOLDERS MEETING
FANDANGO
MOVIECLIPS

8. Never Admit You're Letting Insurance Companies Dictate How You Repair Vehicles

BOYCE WILLIS
CORPORATE REPRESENTATIVE OF
JOHN EAGLE COLLISION CENTER,
JULY 7, 2017
****

12 if you brought your car into
13 my shop, right, the insurance company's going to
14 dictate what -- how we're going to repair your car.

9. It’s not always about showing you the money, sometimes you must be willing to walk away from a repair.

MOVIECLIPS.COM

10. I Have High Hopes That You Will STAND UP to the insurance companies and tell them and your customer in writing that the insurance company's approved repairs *Violate* OEM repair specifications and will cause serious injury or death to your customer or any future owner of this vehicle if an accident occurs in the future.

I Realize That For Decades, The Insurance Industry Has Been Telling You That Their Way Was Safe

However, the Insurance Companies Are Now Caught In A Trap

Science, Engineering and Physics Has Now Emboldened Your Vehicle Repair Labs To Stand Up To These Insurance Bullies Because You Now Have A New Friend-- Crash Test Data Proof

MOVIECLIPS.COM

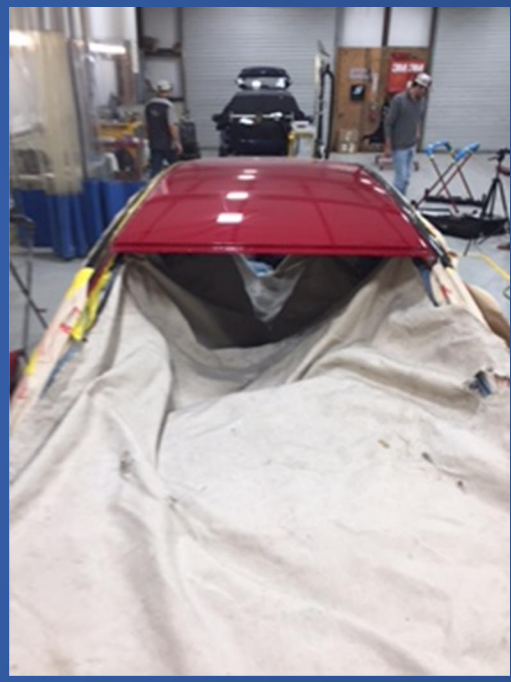
Even Though You Now Have The Ammo, Be Nice

Aftermarket Parts

1) CAPA certified Hood
2) CAPA certified left and right fenders
3) Aftermarket left and right hood hinges (CAPA N/A)
4) Aftermarket bumper reinforcement bar (CAPA N/A)
5) Aftermarket radiator support (CAPA N/A)
6) Aftermarket left front wheel (CAPA N/A)
7) Aftermarket front windshield

Test #1 (Blue Test)

Roof Removed and Reapplied with Adhesive

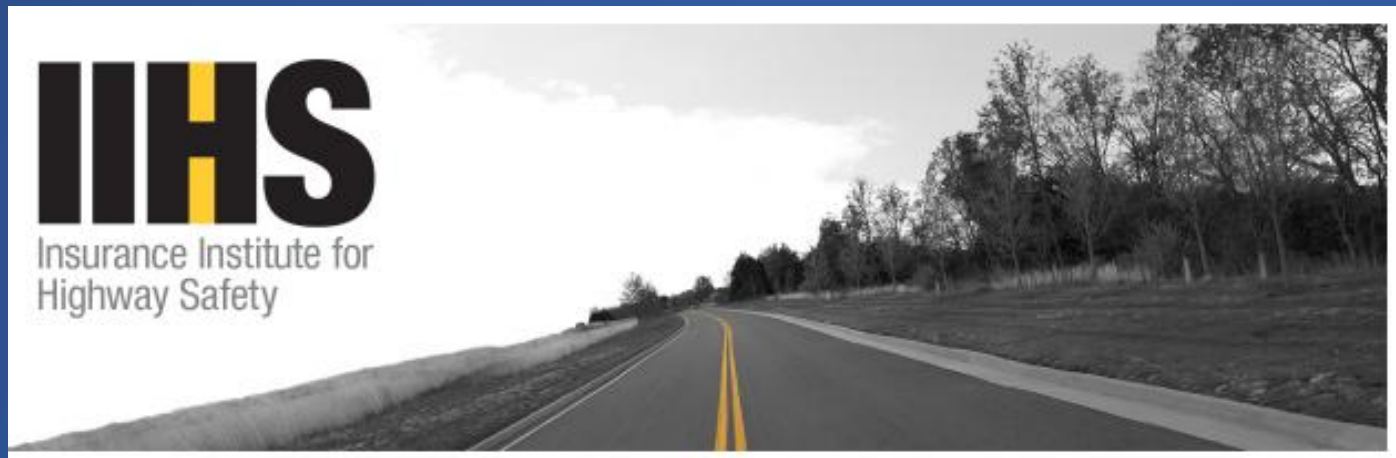


al/engs

Test #2 (Red Test)

No Modifications from Original Factory Condition

Test #3 (Black Test)



Moderate Overlap Frontal Crashworthiness Evaluation

Crash Test Protocol (Version XVIII)

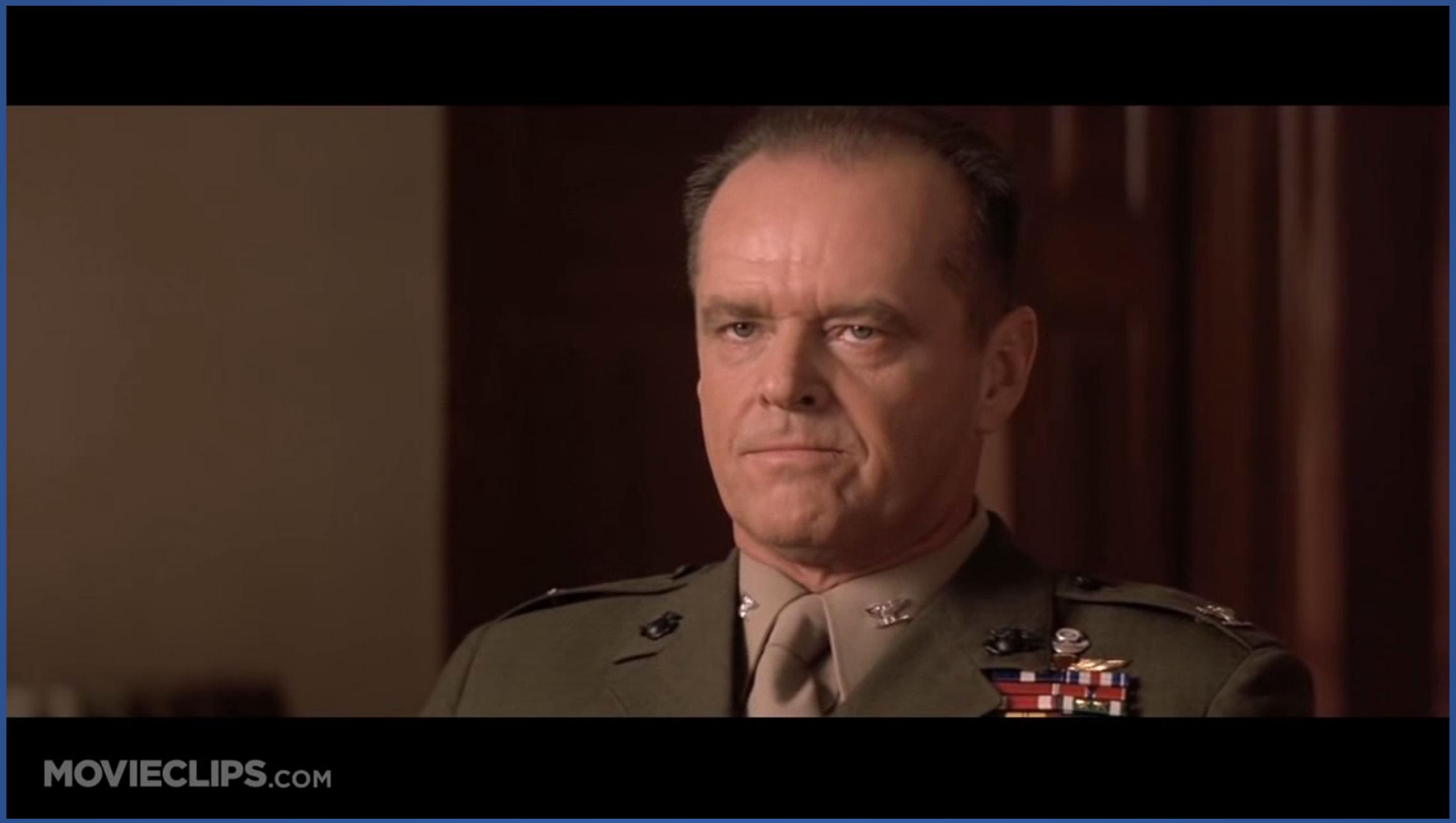
July 2017

IIHS Moderate Overlap Test Protocol Followed to the Letter

The Vehicle Manufacturers Know That Aftermarket Parts Are Unsafe

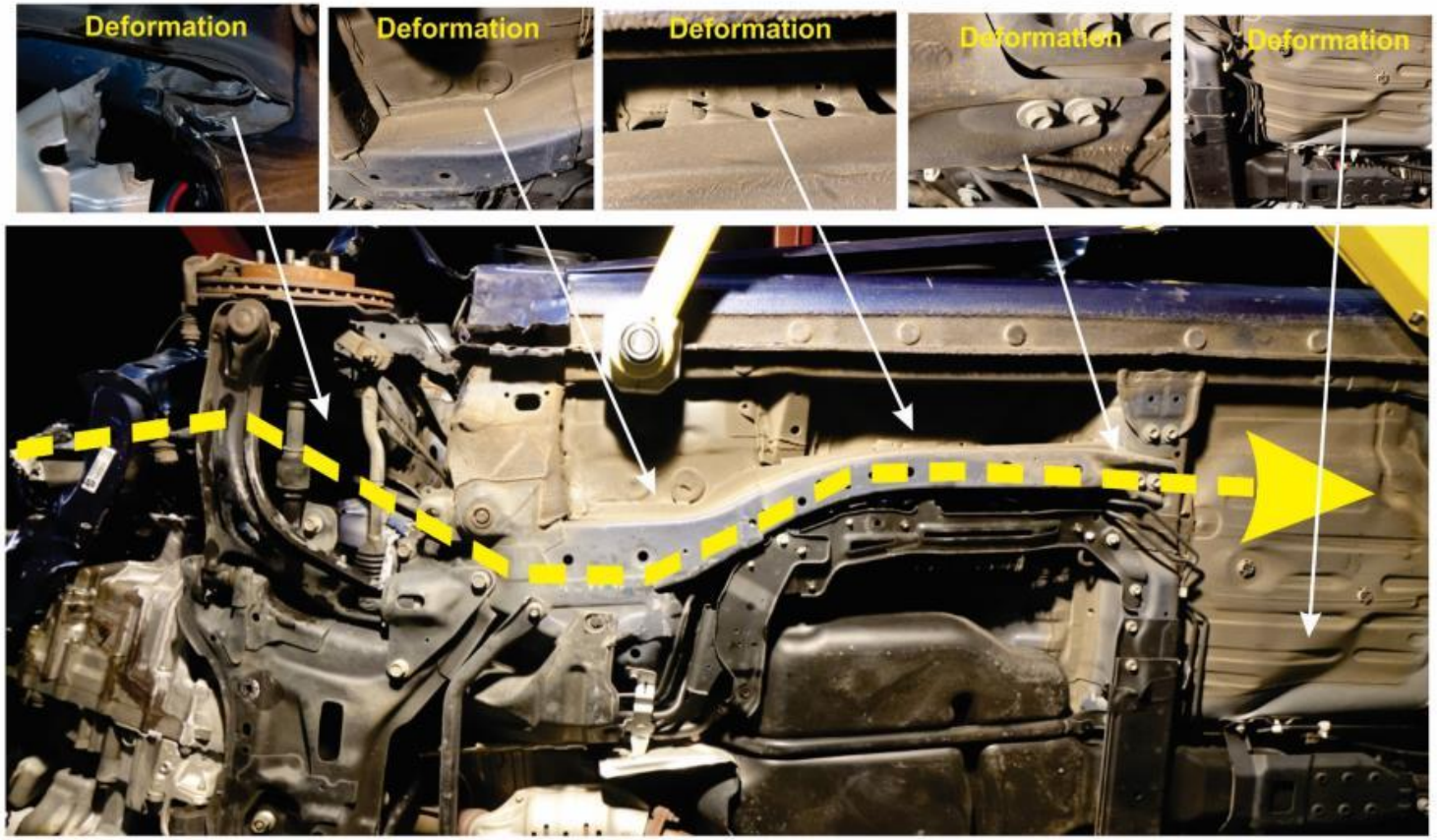
OFF
360
Please check surroundings for safety.
Cross Traffic Alert
PASSENGER AIRBAG OFF

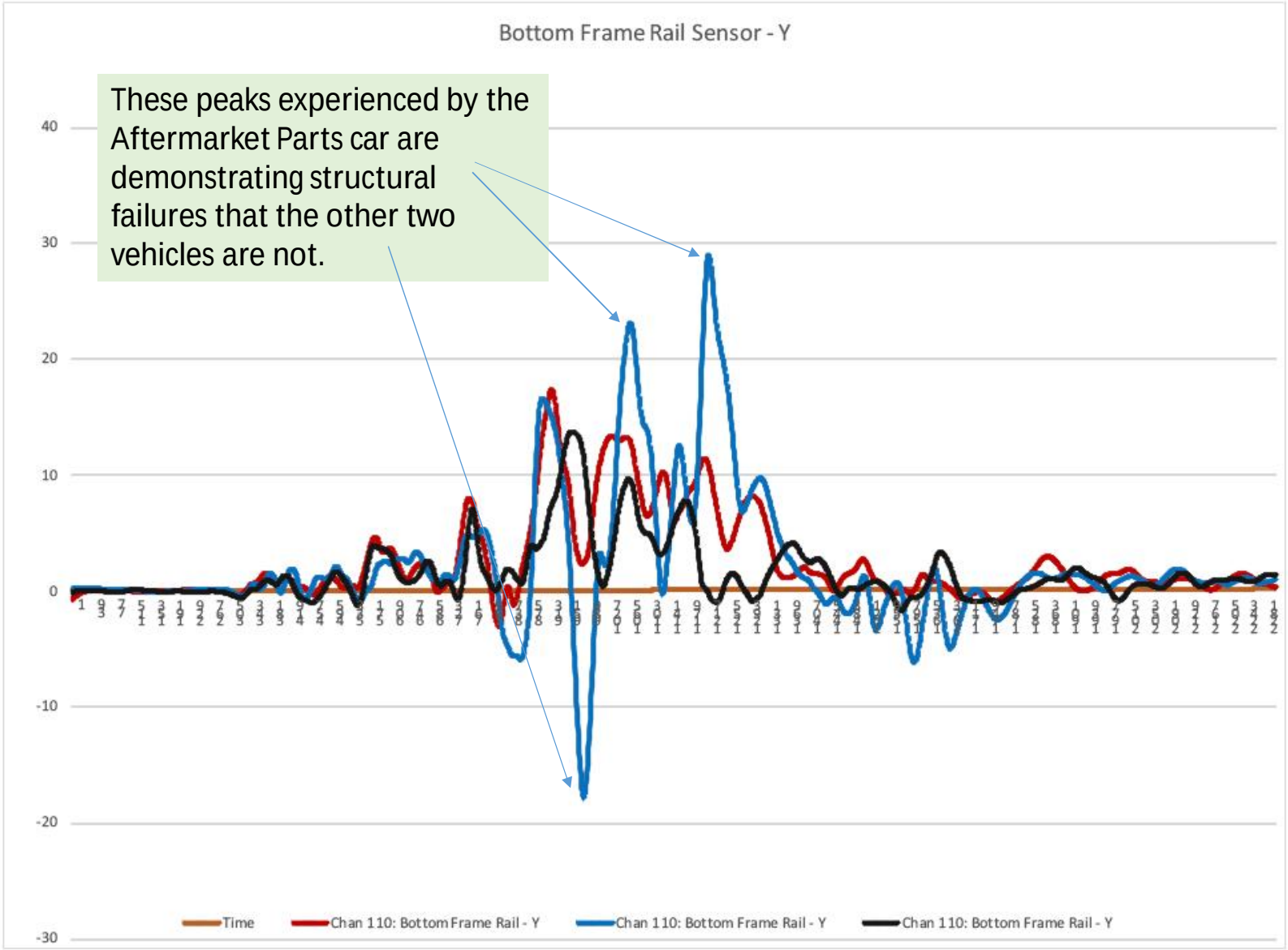
I Ran These Crash Tests Because Your Industry Needed Answers


MOVIECLIPS.COM

Structural collapse underneath the occupants caused injurious vertical loads

Aftermarket Parts

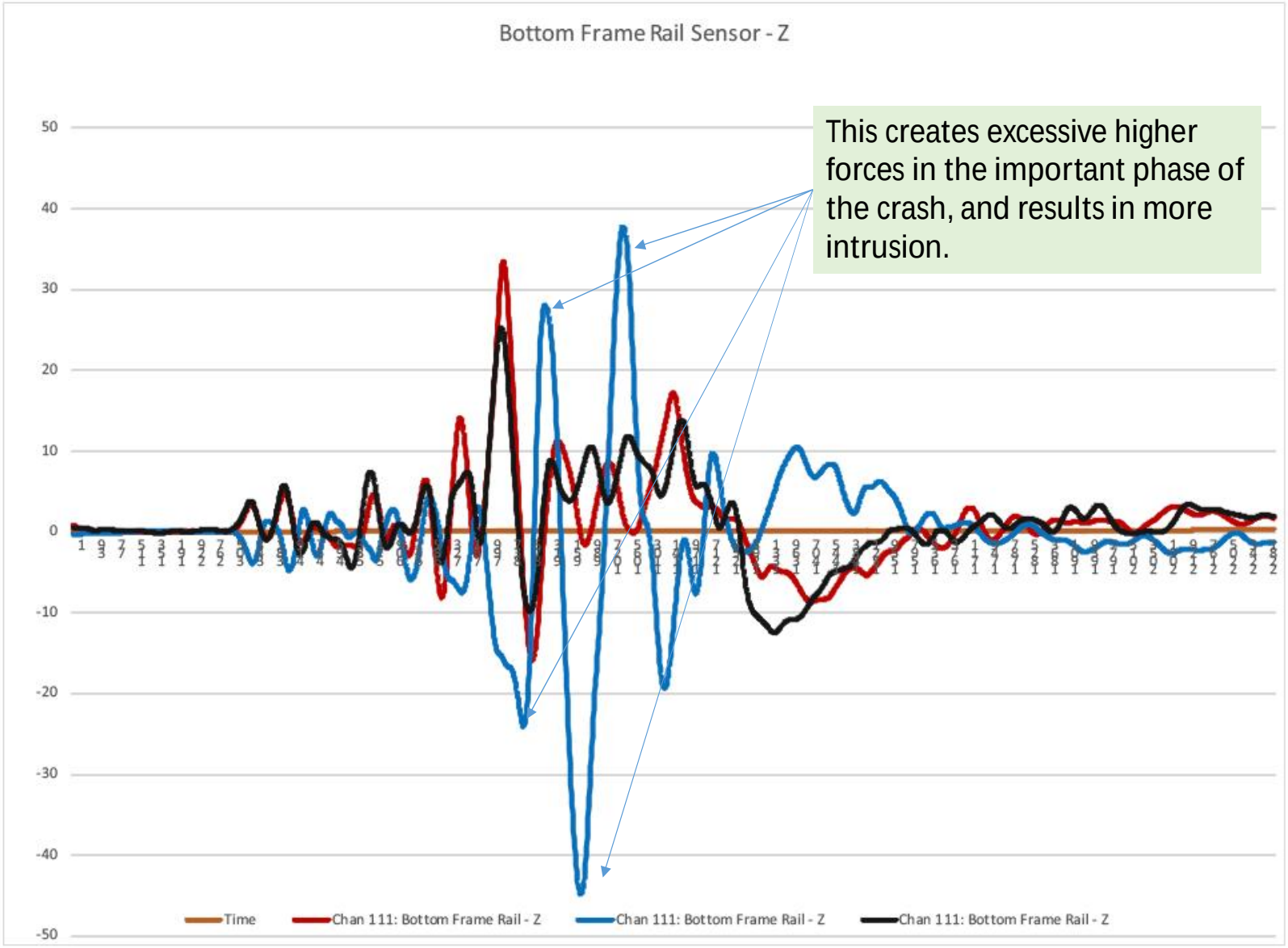




Blue-Aftermarket

Red-Adhesive

Black-OEM



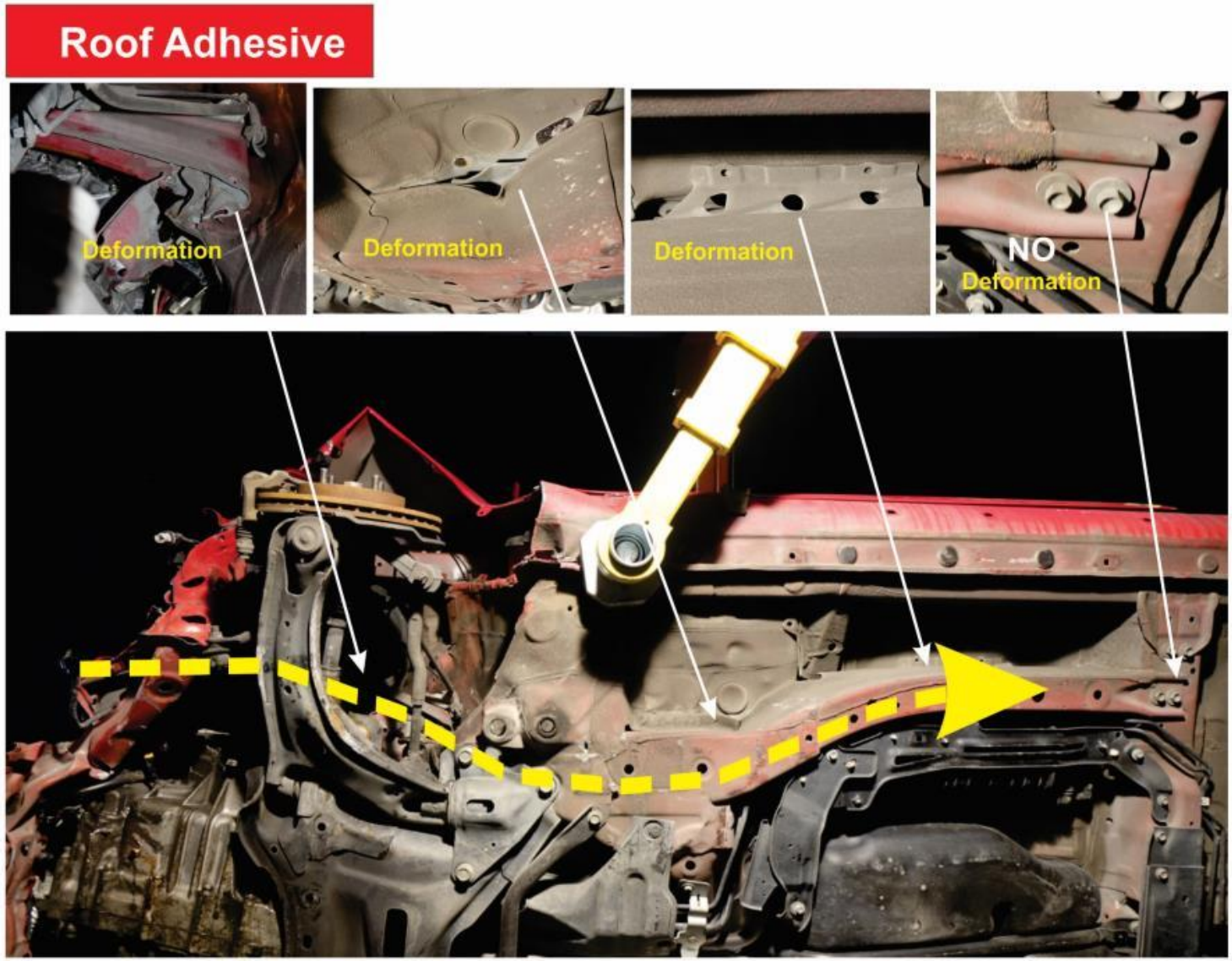
This creates excessive higher forces in the important phase of the crash, and results in more intrusion.

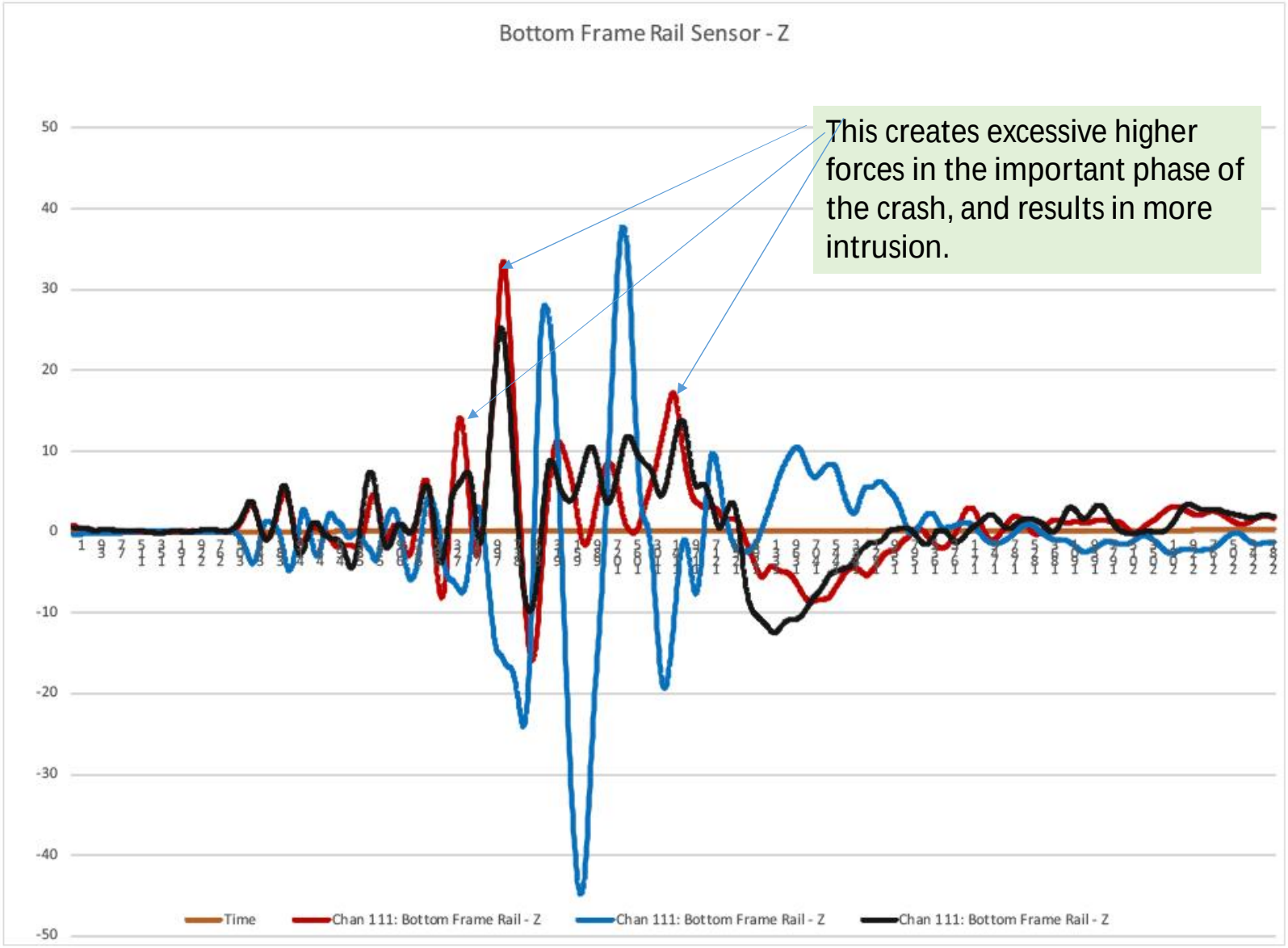
Blue- Aftermarket

Red- Adhesive

Black- OEM

Frame buckled underneath the driver causing injurious loads



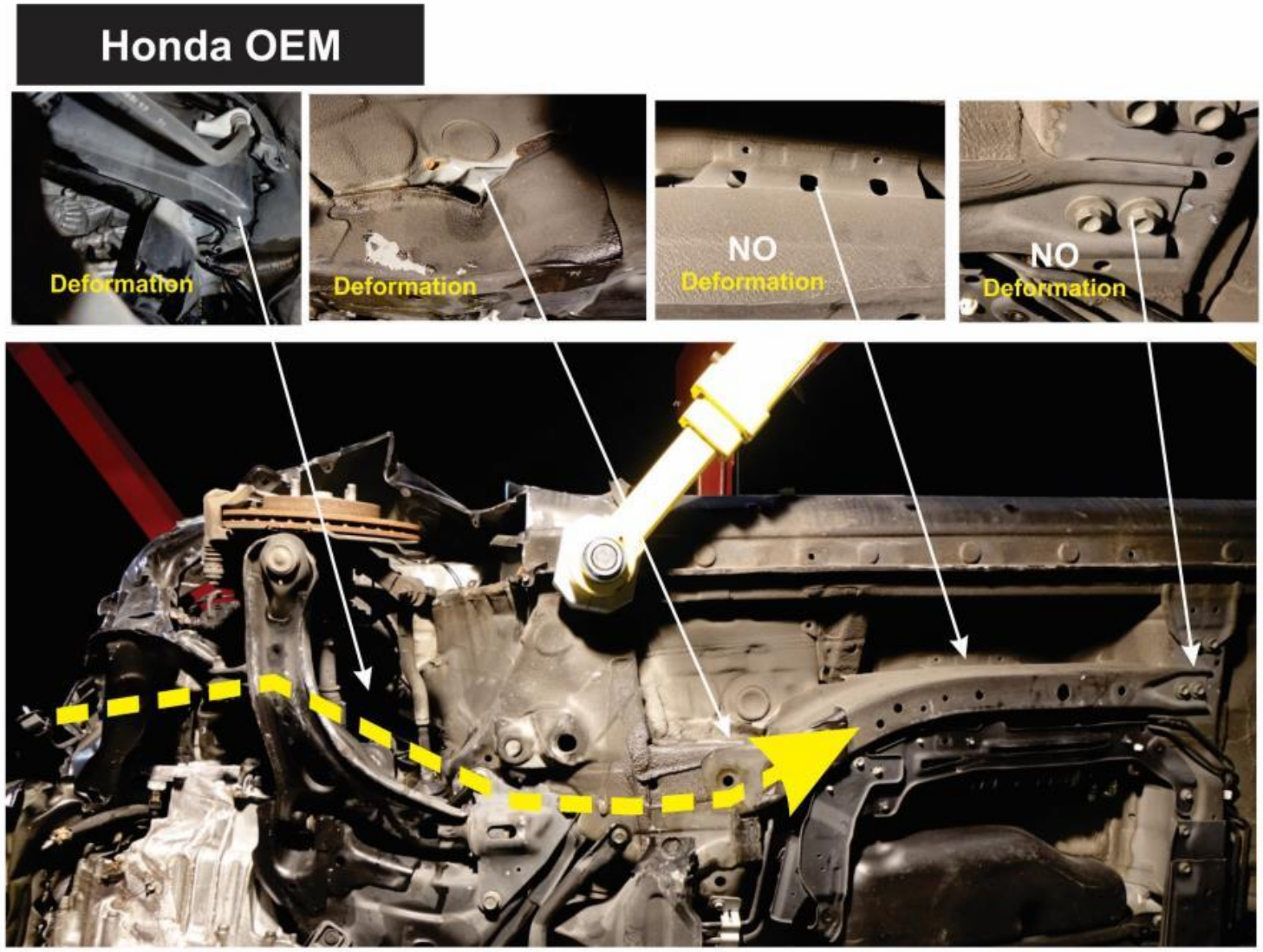


Blue- Aftermarket

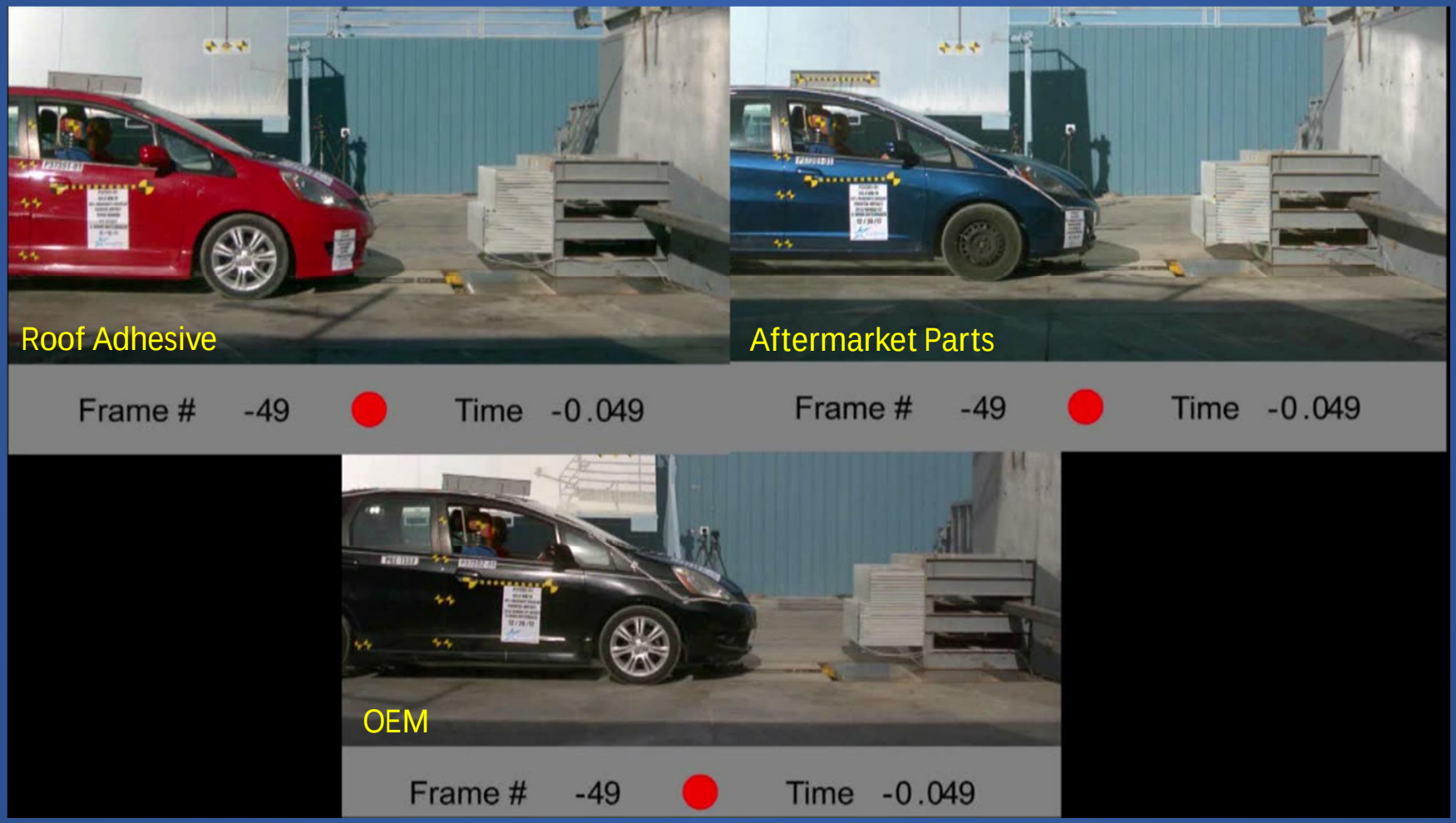
Red- Adhesive

Black- OEM

No frame damage underneath the driver



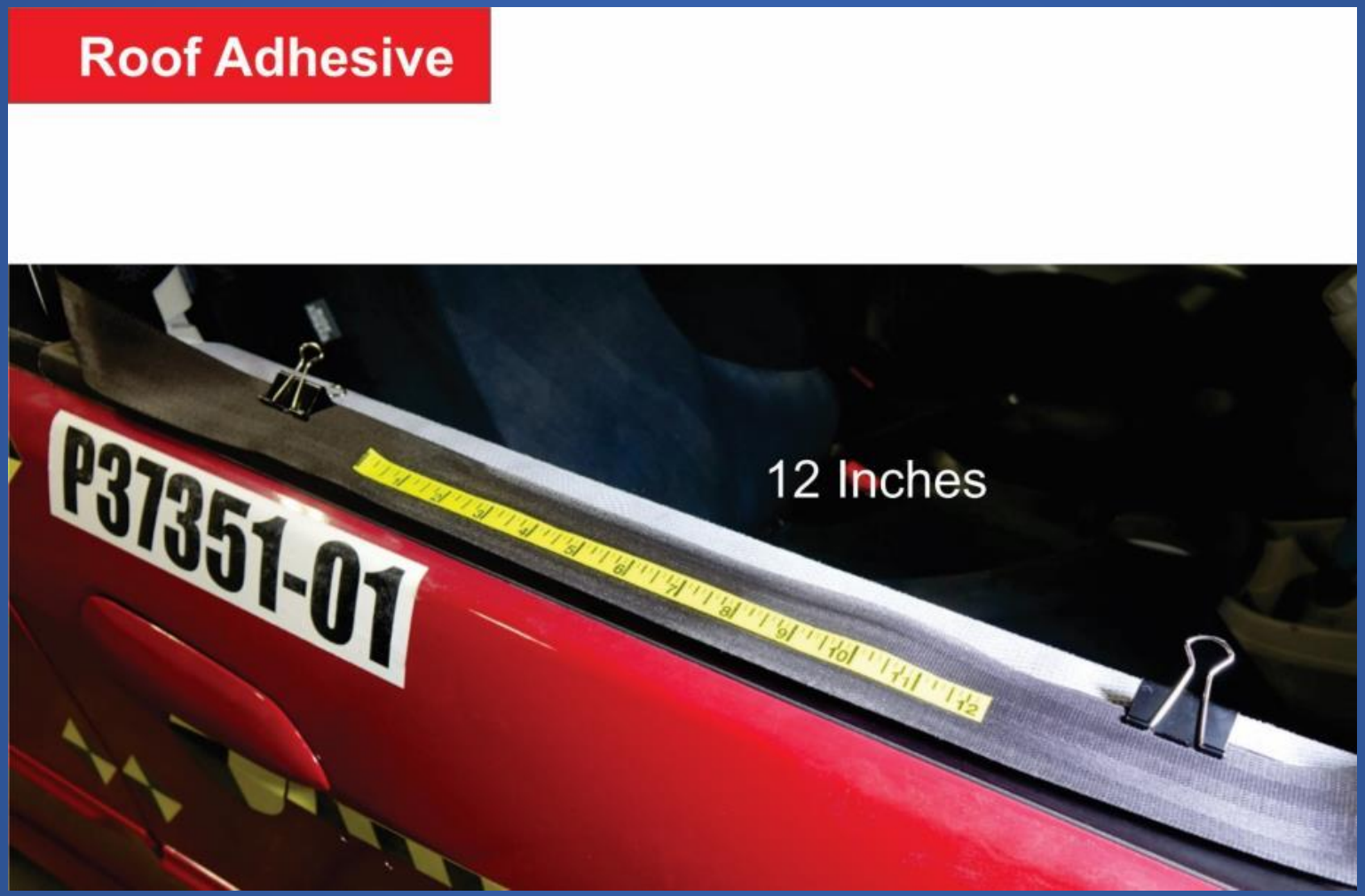
Safety Systems Are Tied Together and Must Work In Harmony With Other Safety Systems



Excessive Frame Crush Affects Seatbelt Performance

Aftermarket Parts

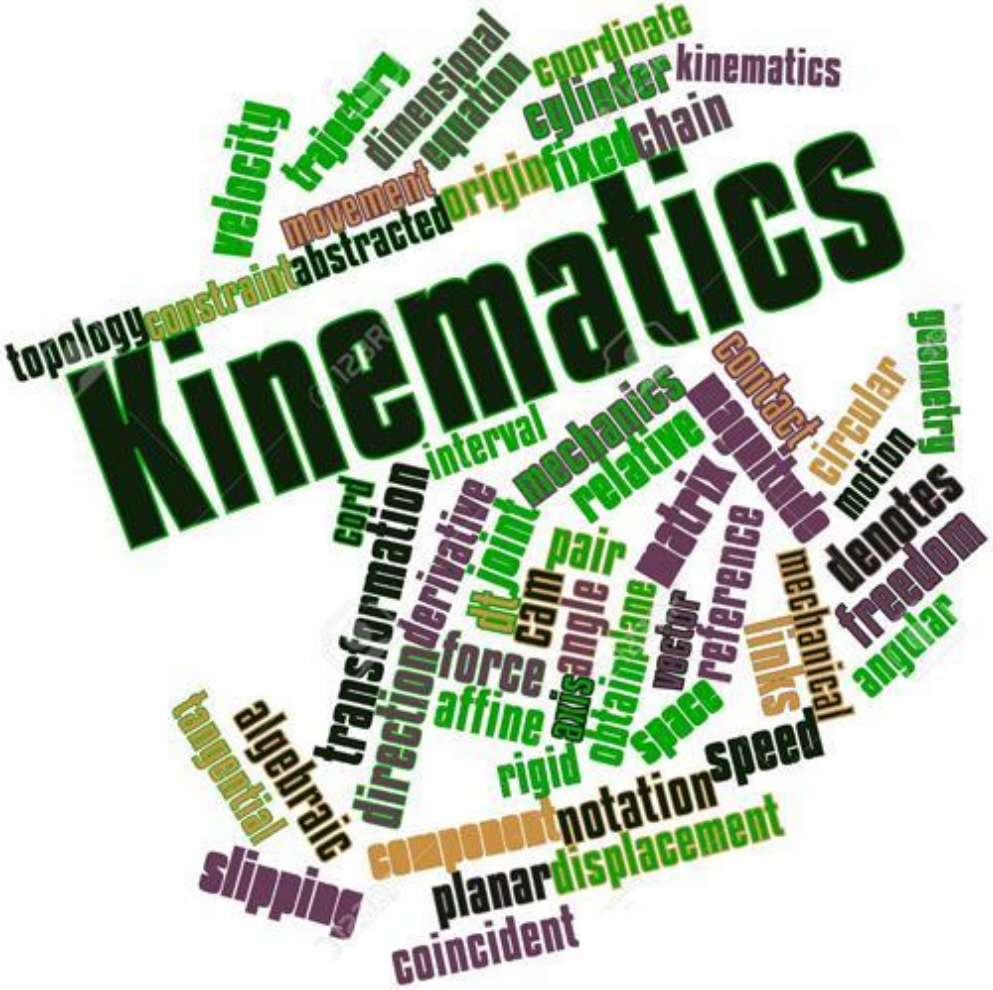
Excessive Frame Crush Affects Seatbelt Performance



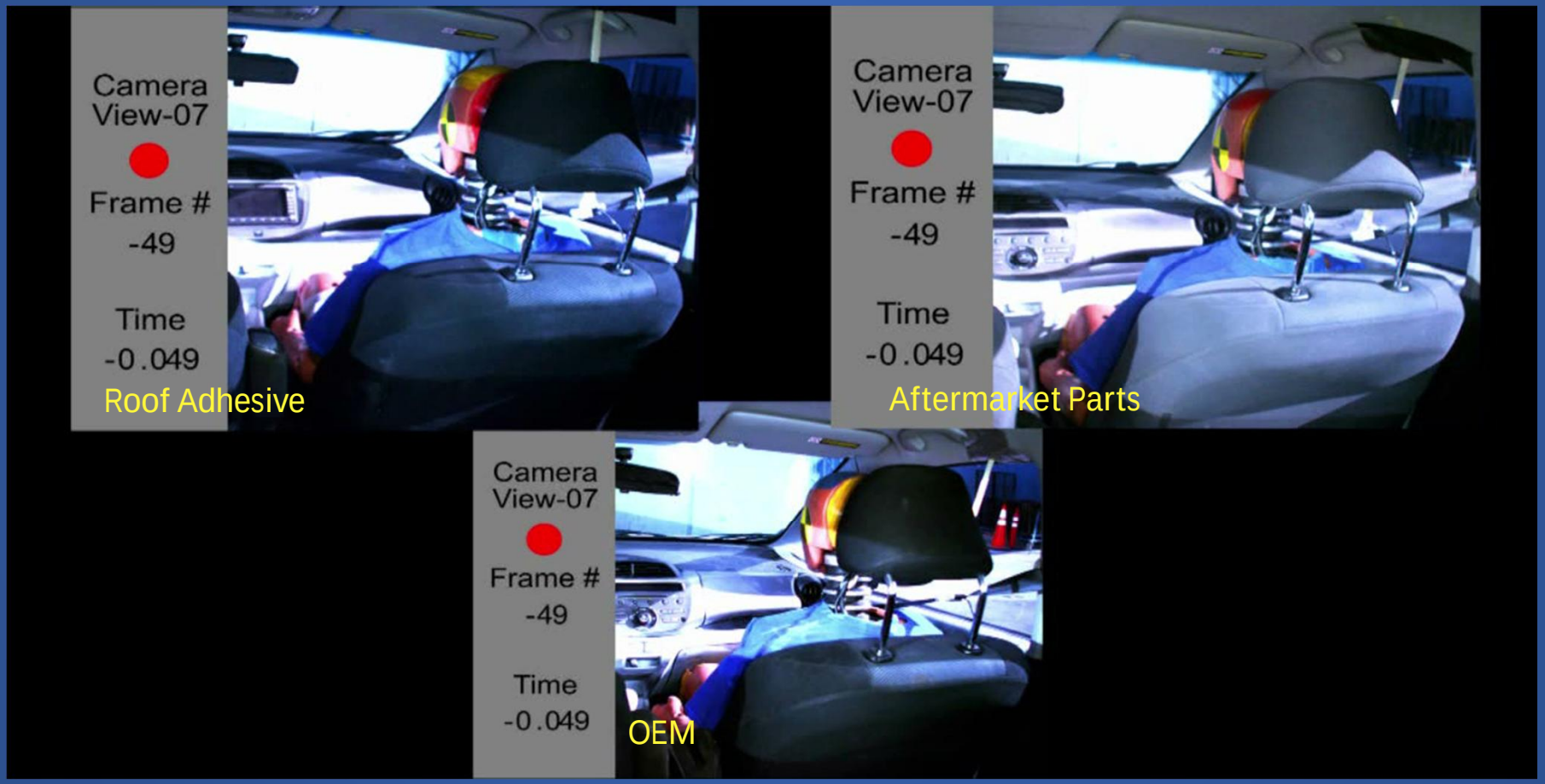
When Safety Systems Work Together, The Seatbelt System Works More Efficiently

Honda OEM

Safety Systems Have A Direct Correlation to Proper Kinematics



Excessive Structural Crush and Increased Seatbelt Payout Negatively Affects Seatbelt Performance



Injuries start with the weakest link, once that link is broken, subsequent failures will increase the potential for injury.

The HIC numbers for the adhesive vehicle are higher because the vehicle failed to properly distribute energy

Roof Adhesive

Curve Description	Units	HIC/CLP	t1	t2	Avg. G's	ms.
Driver HIC15 Primary	HIC15	427.4	91.0	106.0	60.5	15.0
Driver HIC15 Redundant	HIC15	424.5	91.2	106.2	60.3	15.0

Aftermarket Parts

Curve Description	Units	HIC/CLP	t1	t2	Avg. G's	ms.
Driver HIC15 Primary	HIC15	332.4	86.9	101.9	54.7	15.0
Driver HIC15 Redundant	HIC15	316.6	86.8	101.8	53.6	15.0

Honda OEM

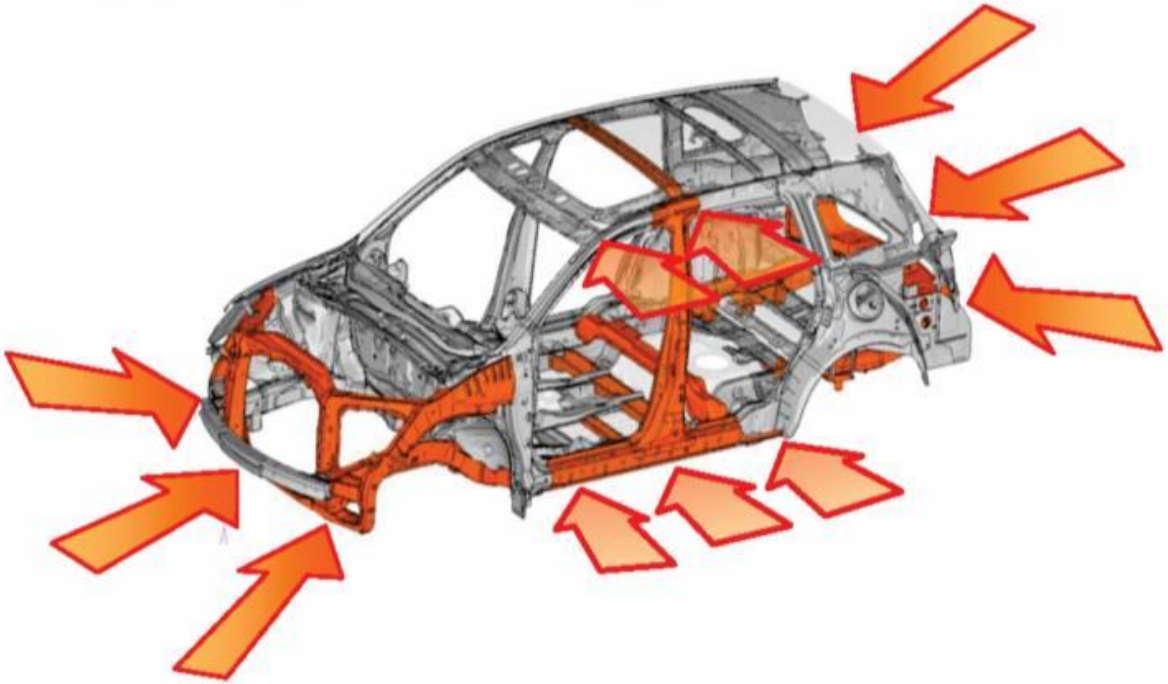
Curve Description	Units	HIC/CLP	t1	t2	Avg. G's	ms.
Driver HIC15 Primary	HIC15	282.6	91.8	106.8	51.3	15.0
Driver HIC15 Redundant	HIC15	280.7	91.9	106.9	51.1	15.0

Structural Performance

HONDA Technical Challenge

Create 360º Safety Cage

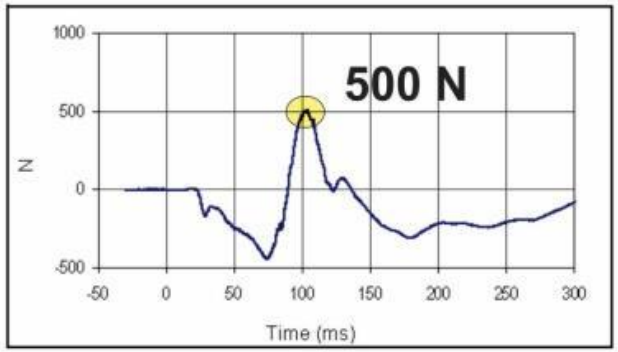
By optimizing Materials and Design



Inadequate Repairs and Material Caused Higher Neck Loads

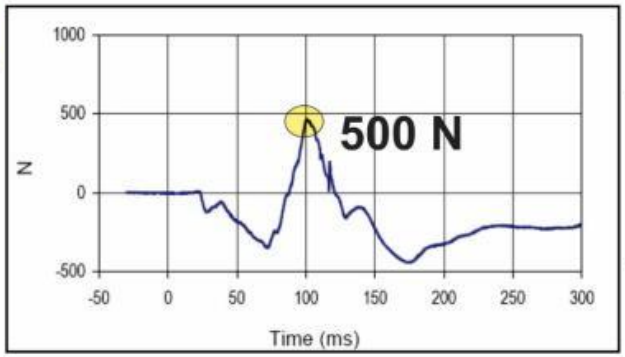
Driver Upper Neck Force X

Roof Adhesive



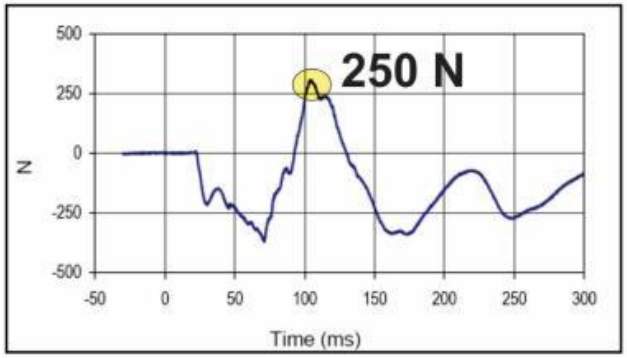
Curve Description			
Driver Upper Neck Force X			
Plot No.		SAE Class	Units
009		1000	N
Max	Time	Min	Time
508.6	104.2	-444.0	74.3

Aftermarket Parts



Curve Description			
Driver Upper Neck Force X			
Plot No.		SAE Class	Units
009		1000	N
Max	Time	Min	Time
465.7	101.4	-439.9	175.3

Honda OEM

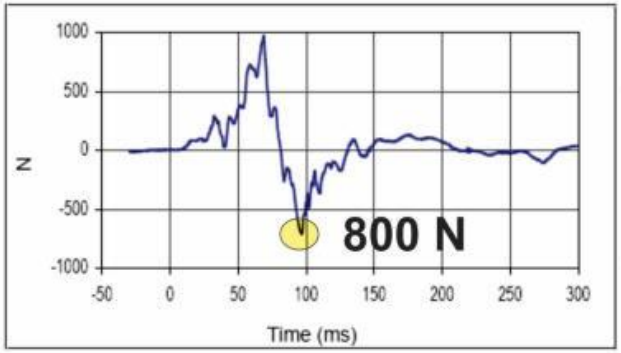


Curve Description			
Driver Upper Neck Force X			
Plot No.		SAE Class	Units
009		1000	N
Max	Time	Min	Time
306.5	104.4	-370.5	71.1

Inadequate Repairs and Material Caused Higher Femur Loads

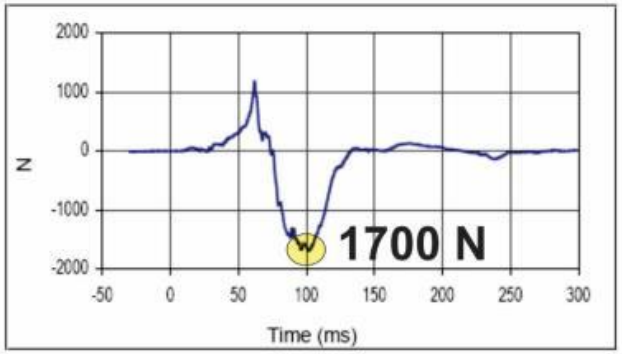
Driver Left Femur

Roof Adhesive



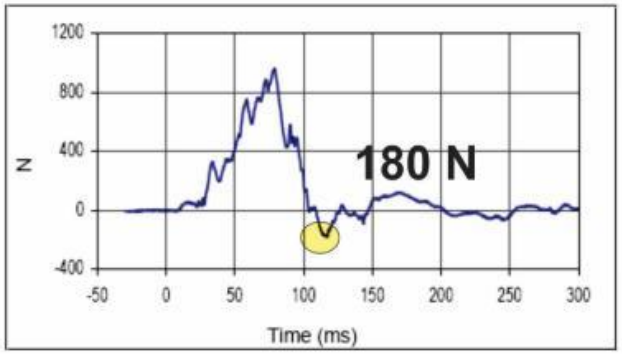
Curve Description			
Driver Left Femur Force Z			
Plot No.		SAE Class	Units
033		600	N
Max	Time	Min	Time
971.1	68.8	-708.9	96.6

Aftermarket Parts



Curve Description			
Driver Left Femur Force Z			
Plot No.		SAE Class	Units
033		600	N
Max	Time	Min	Time
1178.6	61.9	-1685.4	101.4

Honda OEM



Curve Description			
Driver Left Femur Force Z			
Plot No.		SAE Class	Units
033		600	N
Max	Time	Min	Time
960.8	78.8	-179.7	117.1

Roof Adhesive

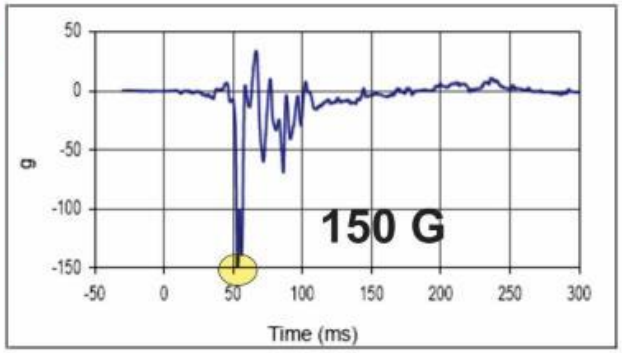
Aftermarket Parts

Honda OEM

Inadequate Repairs and Material Caused Higher Ankle Loads

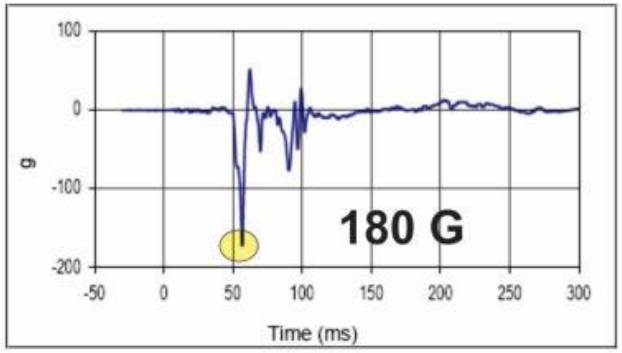
Driver Right Toe

Roof Adhesive



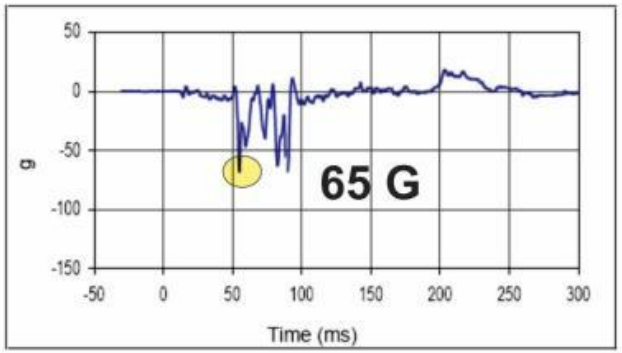
Curve Description			
Driver Right Toe Acceleration Z			
Plot No.		SAE Class	Units
056		180	g
Max	Time	Min	Time
33.9	66.6	-149.3	53.3

Aftermarket Parts



Curve Description			
Driver Right Toe Acceleration Z			
Plot No.		SAE Class	Units
056		180	g
Max	Time	Min	Time
51.1	62.1	-173.6	56.6

Honda OEM



Curve Description			
Driver Right Toe Acceleration Z			
Plot No.		SAE Class	Units
056		180	g
Max	Time	Min	Time
18.2	203.7	-102.1	89.3

Roof Adhesive

Aftermarket Parts

Honda OEM

You Are Now Empowered With Proof That Aftermarket Parts and Non-OEM Repair Methods Destroy Designed and Engineered Safety Systems and Increase the Likelihood of Serious Injury And You Can Now Stand Your Ground

The IIHS Has Now Jumped Into The Fight And Guess What---

They Sided With The Insurance Industry

Did You Expect Anything That Would Jeopardize The Gravy Train?

The IHHS Advisory Feb 15, 2018

- Replacement structural parts must exactly replicate original parts to preserve the integrity of the vehicle's crashworthiness
- Replacing the bumper reinforcement, radiator support and left front wheel resulted in more toepan intrusion and degradation of knee, thigh, hip and ankle
- Other injury measurements indicate an increased risk of injury

Repairer Driven News

1. Some measurements fell outside normal variability
2. Structure had more intrusion and higher forces than seen on tests of unaltered Honda Fits
3. Like, Kind and Quality means it's hard to see how a Good but riskier car would be legally acceptable substitute for the safety baseline
4. IIHS admits it doesn't know how Like, Kind and Quality is judged

To Make Your Profession Great, We Are Going To Have To Drain The Swamp And Put A Stop To Insurance Companies Getting Involved In Safety Issues

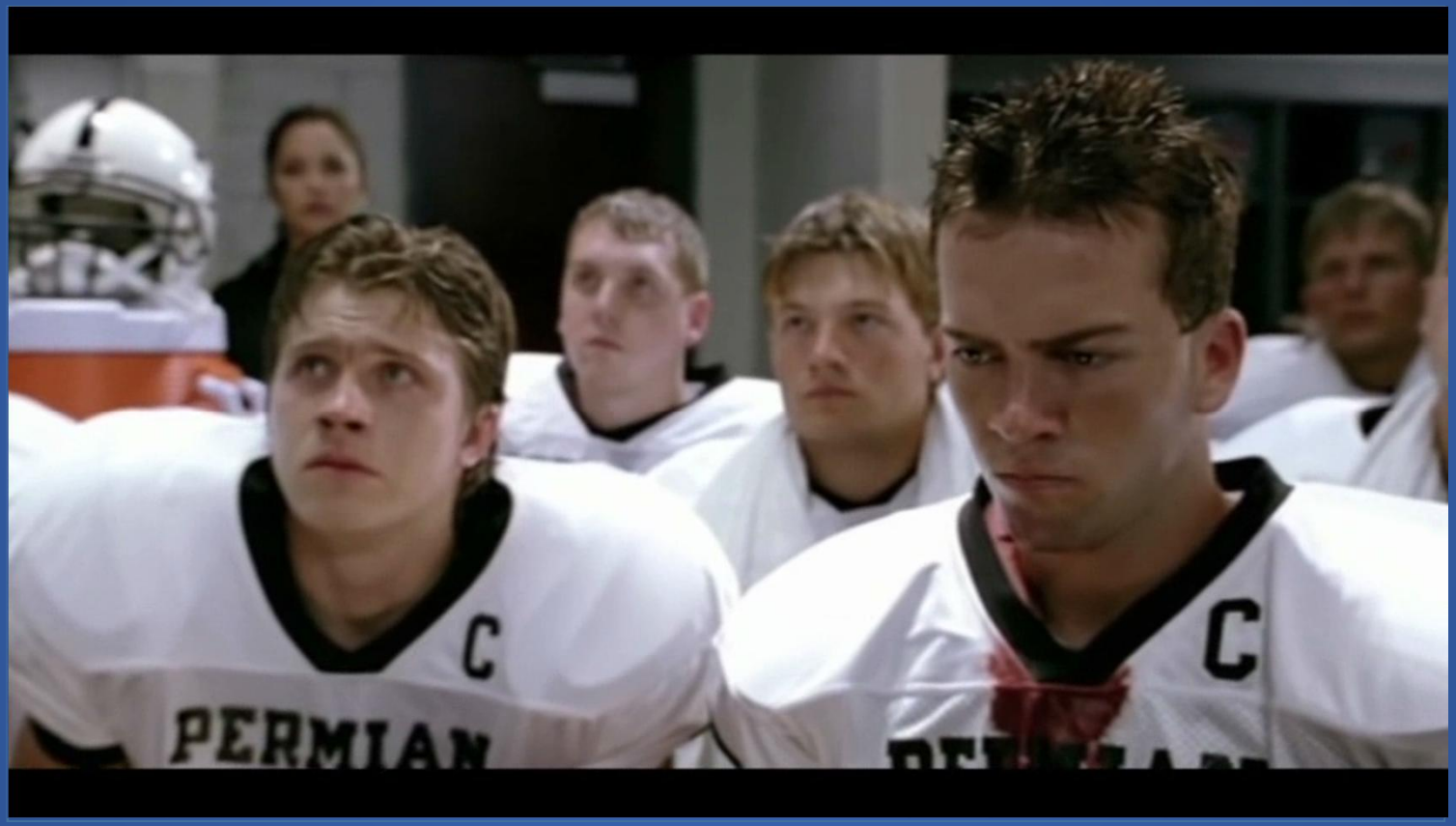
How Does The Vehicle Safety Repair Industry Drain The Swamp:

1. Put everything in writing to the insurance company. Here's your first line. We will not stand by and let you kill or maim our client because you want to put your profit over our customer's safety.

2. Your Customers Should Not Have To Rely On Just Being Lucky As The Basis On Whether They Survive An Accident Or Die

3. Get your customer involved and include them on every email you send to the insurance company

4. We Aren’t Asking You To Be Perfect, We Are Asking That You Do Your Best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5. Get the legal system involved

6. It’s Okay To Love Your Customers, Because The Insurance Companies Sure Don’t

7. Each of You Are Going To Have To Fight For Your Survival Inch By Inch

8. Some Of You Will Take Some Hits Along The Way

I Want You To Know From The Bottom Of My Heart How I Feel About Those Of You Who Are Truly Vehicle Safety Professionals

As Vehicle Safety Professionals,
You Are American Heroes
Because You Are Responsible
For Peoples' Lives

The TRACY law firm

O: (214) 324 - 9000

C: (214) 704 – 8312

ttracy@vehiclesafetyfirm.com

ToddTracyLawFirm

@ToddTracyLaw