

****Deposition of Michael Turner****

****Date:** August 1, 2024**

****Time:** 1:30 PM**

****Location:** Smith & Samsonite LLP, Conference Room D**

****Attorneys Present:****

- ****For Plaintiff:** Janet Robbins, Esq.**

- ****For Defendant:** Will Sams, Esq.**

****Court Reporter:** Emily Davis**

****Janet Robbins, Esq.:** Good afternoon, Mr. Turner. Could you please state your full name for the record?**

****Michael Turner:** My name is Michael James Turner.**

****Janet Robbins, Esq.:** Thank you. Mr. Turner, where do you currently reside?**

****Michael Turner:** I live at 789 Pine Street, Detroit, Michigan.**

****Janet Robbins, Esq.:** Let's start with your professional background. Where are you currently employed?**

****Michael Turner:**** I am currently employed at AutoParts Manufacturing Inc. as the Quality Control Manager.

****Janet Robbins, Esq.:**** How long have you been with AutoParts Manufacturing Inc.?

****Michael Turner:**** I joined AutoParts Manufacturing Inc. on February 1, 2010.

****Janet Robbins, Esq.:**** Can you describe your responsibilities at AutoParts Manufacturing Inc.?

****Michael Turner:**** I oversee the quality control processes, conduct inspections, and ensure that all parts meet industry standards and safety regulations.

****Janet Robbins, Esq.:**** Were you involved in the production of the Model X brake pads?

****Michael Turner:**** Yes, I was responsible for overseeing the quality control of the Model X brake pads.

****Janet Robbins, Esq.:**** When did the production of the Model X brake pads begin?

****Michael Turner:**** Production began on March 15, 2020.

****Janet Robbins, Esq.:**** Can you outline the key milestones in the production of the Model X brake pads?

****Michael Turner:**** Certainly. The initial design phase started on January 10, 2020. We completed the prototype testing by February 28, 2020, and began mass production on March 15, 2020.

****Janet Robbins, Esq.:**** When did you first become aware of potential issues with the Model X brake pads?

****Michael Turner:**** We first received reports of issues on June 1, 2020, from a major client.

****Janet Robbins, Esq.:**** What actions did you take upon receiving these reports?

****Michael Turner:**** We initiated an internal investigation on June 2, 2020, and conducted a thorough inspection of the production line.

****Janet Robbins, Esq.:**** What were the findings of your internal investigation?

****Michael Turner:**** We discovered that a batch of brake pads produced between May 1, 2020, and May 15, 2020, had a manufacturing defect due to a malfunctioning press machine.

****Janet Robbins, Esq.:**** How many brake pads were affected by this defect?

****Michael Turner:**** Approximately 10,000 brake pads were affected.

****Janet Robbins, Esq.:**** What steps did you take to address the defect?

****Michael Turner:**** We halted production on June 3, 2020, and recalled the affected batch on June 5, 2020. We also repaired the malfunctioning press machine by June 10, 2020.

****Janet Robbins, Esq.:**** Were there any further issues reported after the recall?

****Michael Turner:**** Yes, we received additional reports of brake pad failures on July 1, 2020, which prompted a second investigation.

****Janet Robbins, Esq.:**** What did the second investigation reveal?

****Michael Turner:**** The second investigation, completed on July 15, 2020, revealed that the issue was not limited to the initial batch but was a systemic problem with the raw materials supplied by our vendor.

****Janet Robbins, Esq.:**** When did you notify the vendor of these findings?

****Michael Turner:**** We notified the vendor on July 16, 2020, and requested an immediate review of their quality control processes.

****Janet Robbins, Esq.:**** Did the vendor take any corrective actions?

****Michael Turner:**** Yes, the vendor conducted their own investigation and confirmed the issue on July 25, 2020. They implemented corrective measures and provided us with a new batch of raw materials on August 1, 2020.

****Janet Robbins, Esq.:**** When did you resume production of the Model X brake pads?

****Michael Turner:**** We resumed production on August 5, 2020, after verifying the quality of the new raw materials.

****Janet Robbins, Esq.:**** Were there any further incidents reported after resuming production?

****Michael Turner:**** No, there have been no further incidents reported since we resumed production.

****Janet Robbins, Esq.:**** Thank you, Mr. Turner. I have no further questions at this time.

****Will Sams, Esq.:**** I have a few questions. Mr. Turner, can you describe the nature of the defect found in the brake pads?

****Michael Turner:**** The defect was due to improper bonding of the friction material to the metal backing plate, which compromised the brake pad's performance.

****Will Sams, Esq.:**** How did you ensure that the new batch of raw materials met quality standards?

****Michael Turner:**** We conducted extensive testing, including tensile strength tests and thermal cycling tests, to ensure the new materials met our quality standards.

****Will Sams, Esq.:**** Were there any regulatory bodies involved in the investigation?

****Michael Turner:**** Yes, the National Highway Traffic Safety Administration (NHTSA) was notified on June 6, 2020, and they conducted their own review.

****Will Sams, Esq.:**** What was the outcome of the NHTSA review?

****Michael Turner:**** The NHTSA concluded their review on August 10, 2020, and confirmed that our corrective actions were adequate.

****Will Sams, Esq.:** Thank you, Mr. Turner. No further questions.

****Court Reporter:**** The time is now 3:00 PM. This concludes the deposition of Michael Turner.