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

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

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

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

\*\*Attorneys Present:\*\*

- \*\*For Plaintiff:\*\* Janet Robbens, Esq.

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

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

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

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

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

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

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

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

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

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

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

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

\*\*Janet Robbens, 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 Robbens, 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 Robbens, 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 Robbens, 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 Robbens, 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 Robbens, 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 Robbens, 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 Robbens, 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.