

1 SUPERIOR COURT OF THE STATE OF CALIFORNIA

2 COUNTY OF SANTA CLARA

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4
5 TED EDWARD CUSTER,

6 Plaintiff,

7 vs.

No. 16CV302992

8 FCA US LLC, a Delaware
9 Limited Liability company;
10 NORMANDIN'S, a California
dba NORMANDIN CHRYSLER JEEP;
and DOES 1 to 10, inclusive,

11 Defendants.

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16 DEPOSITION OF JASON HORWOOD

17 SAN JOSE, CALIFORNIA

18 OCTOBER 22, 2018

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23 REPORTED BY: AUDREY KLETTKE, CSR #11875

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18 Deposition of JASON HORWOOD, taken on behalf of
19 Plaintiff, at 99 Almaden Boulevard, Suite 600, San
20 Jose, California 95113, commencing at 1:15 p.m.,
21 Monday, October 22, 2018, before Audrey Klettke, CSR
22 No. 11875.
23
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25

A P P E A R A N C E S

For the Plaintiff: THE ALTMAN LAW GROUP,
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Los Angeles, CA 90067
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For the Defendants: CLARK HILL, LLP
BY: GEORGES A. HADDAD, ESQ.
One Embarcadero Center
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EXHIBIT 1 Notice of Deposition

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1 SAN JOSE, CA

2 MONDAY, OCTOBER 22, 2018; 1:15 p.m.

3 -o0o-

4 JASON HORWOOD,

5 being first duly sworn by the Certified Shorthand
6 Reporter to tell the truth, the whole truth, and
7 nothing but the truth, testified as follows:

8 -o0o-

9 EXAMINATION BY MR. ISAACS

10 Q. Good morning, Mr. -- how do you pronounce your
11 last name?

12 A. Horwood.

13 Q. Horwood.

14 We'll dispense with one of the questions.

15 The second one is: Will you spell your name
16 for the record.

17 A. Oh, yeah. It's H-o-r-w-o-o-d.

18 Q. Have you ever had your deposition taken?

19 A. No.

20 Q. So even though it's kind of an informal
21 setting, it's the same weight in terms of a court of
22 law. So any type of kind of perjury would be the same;
23 get you in the same type of trouble.

24 I'll be asking you questions. The court
25 reporter will be writing down everything you say

1 verbatim. If you don't know something, don't guess.

2 A. Okay.

3 Q. If you have an estimation -- if you have an
4 estimation, then we are entitled to that. I laugh
5 because there's one example that I used last time.
6 It's the same example that I use every time, that every
7 lawyer has ever used in every deposition since the dawn
8 of time.

9 If I asked you to tell me what the length of
10 this table is, you would be able to estimate it because
11 you can see the table in front of you. If I asked you
12 what the -- the length of the table in my house is, it
13 would be a guess because you've never seen it.

14 A. Right.

15 Q. And you don't know if I have a table. So
16 that's kind of the difference between the estimation
17 and a guess.

18 If at any time you need a break, just answer
19 the pending question, and you're completely -- feel
20 free to take a break.

21 A. Okay.

22 Q. If you don't understand anything, ask me to
23 clarify. I'm happy to help in that regards. And
24 that's kind of the main portions.

25 The only other thing that may be difficult

1 is -- it's difficult to be conscious of the court
2 reporter, so we can't talk over each other.

3 A. Gotcha.

4 Q. And I will be conscious of that.

5 You'll talk over me occasionally, just because
6 that's the way we do it in conversation.

7 And then the other thing is to answer verbally,
8 because nods and uh-huhs don't come across on paper.

9 I think that's about it for kind of what is
10 expected of you.

11 A. Okay.

12 MR. HADDAD: I may object from time to time,
13 but I will get that on the record.

14 THE WITNESS: Okay.

15 MR. HADDAD: Don't worry about it. It's for
16 later.

17 Q. BY MR. ISAACS: He'll object. If he doesn't
18 want you to answer, he may say, you know, you can
19 answer. I imagine he will tell you if he doesn't want
20 you to answer the question.

21 So with that said, are you prepared to offer
22 your best testimony?

23 A. Yes.

24 Q. Is there any reason, such as drugs or alcohol,
25 that you would not be able to give your best testimony?

1 A. No.

2 Q. So I've marked as Exhibit 1 what is called a
3 notice of deposition.

4 (Plaintiff's Exhibit 1 was marked for
5 identification.)

6 Q. BY MR. ISAACS: Have you ever seen this
7 document before?

8 A. I have.

9 Q. When did you see it?

10 A. I believe last week.

11 Q. And did you do -- did you read it?

12 A. About half of it.

13 Q. Did you do any preparation for this --

14 A. No.

15 Q. -- deposition?

16 A. No.

17 Q. And are you aware of the customer, Mr. Ted
18 Custer?

19 A. I know who he is, yes.

20 Q. Do you remember him?

21 A. Vaguely.

22 Q. What do you remember about him?

23 A. I just remember him coming in a lot. Lots of
24 different issues.

25 Q. So the vehicle was more what you remember

1 than --

2 A. Yeah, yeah.

3 Q. And so there's no -- any more specifics about
4 what you remember about the vehicle apart from repair
5 orders?

6 A. No. Huh-uh.

7 Q. So basically I am going to ask you about your
8 background, and then we are going to go over the repair
9 orders that you worked on, and you're going to help me
10 to understand kind of what's in them.

11 So let's start with you and your background. I
12 am going to ask you about your education and training
13 as it relates to basically vehicles.

14 So why don't we start with education and we
15 will move into employment after that.

16 A. Okay. I basically have an AA degree in
17 automotive technology through Evergreen Valley College.
18 And I was also a technician from 1988 to 2002. And
19 then I switched over to a service advisor in 2002.

20 Q. And when did you graduate Evergreen?

21 A. 1990.

22 Q. And so what was between '90 and '98? What were
23 you?

24 A. I was actually working at Frontier Ford from
25 '90 to '96. And in July of '96 I moved over to

1 Normandin. And I have been there ever since.

2 Q. When you started with Frontier Ford, what was
3 the job --

4 A. I was a technician.

5 Q. And you were a technician for those six years?

6 A. Um-hum.

7 Q. They have some certification process; is that
8 correct?

9 A. I was actually in a Ford ASSET Program.

10 Q. What is a Ford ASSET Program?

11 A. Basically it's a -- it's a class where you go
12 to school for six weeks. And then you go to the dealer
13 for six weeks and apply what you learned at the school.
14 And every other six weeks you keep doing that for two
15 years.

16 Q. And that's how you got into the Ford --

17 A. Yes.

18 Q. And so what certifications, as you can recall,
19 best of your ability, did you obtain at Frontier Ford?

20 A. I took all the Ford classes that was required
21 for me to stay up-to-date in training. And then also
22 ASE certified.

23 Q. And did you have any specialties at Ford?

24 A. I was more of an electrical drivability kind of
25 guy.

1 Q. And 1996, you moved to --

2 A. Normandin.

3 Q. -- Normandin?

4 A. Um-hum.

5 Q. What position did you start at?

6 A. Technician.

7 Q. And you're a technician from '96 to 2002?

8 A. Yes.

9 Q. Did you have any specialties as a technician?

10 A. Just electrical drivability stuff.

11 Q. And did you do all the training?

12 A. Um-hum.

13 Q. I'm telling you, it's going to be difficult.

14 A. Yes.

15 Q. And in 2002, you switched over to become a
16 service advisor?

17 A. Yes.

18 Q. What prompted that decision?

19 A. I injured my back and felt it was time to make
20 a change.

21 Q. Did you have to do additional training to
22 become a service advisor?

23 A. A little bit. Not a whole lot.

24 Q. What was the difference in the training to
25 become a service advisor from the technician --

1 A. More of a customer relations kind of training
2 than anything. How to talk to customers and whatnot.

3 Q. And does Chrysler have classes on kind of that?

4 A. Yes.

5 Q. Are those classes a result in certifications?

6 A. Yes. Every year we have to get certified in
7 order to maintain our status; otherwise, we don't get
8 certain claims paid and whatnot.

9 Q. And when you say "status," is that a status
10 advisor?

11 A. Yes, my training status.

12 Q. Are there different skill levels of a service
13 advisor?

14 A. No.

15 Q. So as a service advisor at Normandin -- can you
16 walk me through your responsibilities?

17 A. Yeah. Basically I greet the customer as they
18 come in. Take down all the information, what they are
19 bringing it in for and whatnot.

20 And then periodically throughout the day keep
21 them updated on what is going on, and upsell any
22 repairs they may need or anything like that.
23 Maintenance.

24 Q. And I understand there's teams?

25 A. Um-hum. Yes.

1 Q. Can you explain to me how the teams work?

2 A. We have five teams. Each team is specialized.
3 We have two Chrysler teams that just do Chrysler cars.
4 Then we have a Dodge team just does the trucks. And
5 then we have a Jeep team, which is mainly just do the
6 Jeeps. And then we have one that does Fiat.

7 Q. How long have you been on the Jeep team?

8 A. Since '96.

9 Q. So then can you walk me through -- a customer
10 like Mr. Custer comes in. States he has an issue.
11 Speaks to you. What's the first thing that you do?

12 A. Ask him open-ended questions. When does the
13 problem happen? Is it hot or cold? You know, as much
14 information as I can from him.

15 Q. And after you have gotten enough information,
16 what is your next move?

17 A. Next move is to have him sign an estimate, if
18 there is an estimate. If there is not, then he just
19 signs the work order that shows that that's what we are
20 going to do for you.

21 And then I go over to my office and I print out
22 a repair order, and I give it to my technicians to work
23 on.

24 Q. And do you assign the technician?

25 A. I don't. We have a foreman. Each team has a

1 foreman that actually is in charge of that.

2 Q. Who is the foreman on your team?

3 A. His name is Rene.

4 Q. Say it again.

5 A. R-e-n-e.

6 Q. And do you work with Rene to assign techs?

7 A. Yes.

8 Q. What is that collaborative process like?

9 A. We work together. Everything that I give to
10 him, he dispatches to the right category person. So it
11 gets done right in a timely manner.

12 Q. I guess more, kind of what information do you
13 give to him to -- so that he can find the right tech?

14 A. I just -- when I write it up, he can tell by
15 the problem that -- who it needs to go to. Everybody
16 in the team is specialized. We have a transmission
17 guy, an engine guy, an electrical guy.

18 Q. And you were drivability?

19 A. Drivability and electrical.

20 Q. So that's why you are on a lot of these,
21 because there is drivability and electrical issues?

22 A. I believe I was the service advisor for him.

23 Q. All right. This came up in a previous
24 deposition that there's a texting system.

25 A. Um-hum.

1 Q. And you ask customers if they are okay with you
2 texting them -- or Chrysler does?

3 A. Yeah. It's just an added convenience for the
4 customer. A lot of them like to get texts instead of
5 calls.

6 Q. Do you know how long on Chrysler -- your
7 dealership's computers those texts are stored?

8 A. I don't.

9 Q. And do you have any -- I will ask it a
10 different way.

11 If a customer -- if a customer's issue is
12 caused in a tech's opinion by aftermarket parts, is it
13 your responsibility and point to notate that in the
14 repair order?

15 A. Yes.

16 Q. And what is the training like for notating
17 that -- or policy?

18 A. We just make a note on the repair order and put
19 it in the system as well.

20 Q. And is that the same for if -- customer's bad
21 maintenance of the vehicle?

22 A. No.

23 Q. Is there a policy about if you or a tech
24 discovers that bad maintenance of the vehicle is
25 causing the problem, to notate it?

1 A. Yes.

2 Q. What is that policy?

3 A. Basically if they have an engine issue or
4 transmission issue, depending on what the issue is,
5 depending on how many miles are on it, Chrysler
6 will want maintenance records to prove that it was
7 serviced correctly. If it wasn't properly maintained,
8 then they won't warranty the repair.

9 Q. If Chrysler is asking for service records, is
10 that notated somewhere here?

11 A. No.

12 Q. And lastly, same question for misuse of the
13 vehicle.

14 A. Um-hum. Yes.

15 Q. There is a policy for notating?

16 A. We put it in the "Comments" section of the
17 repair order.

18 Q. And just to confirm, the RO date is the date
19 that the vehicle was brought in for the repair,
20 correct?

21 A. Correct.

22 Q. And the invoice date is the date that it's
23 available to the customer?

24 A. Yes.

25 Q. So the difference between those dates would

1 represent typically the date that the customer did not
2 have access to his vehicle because it was in the shop?

3 A. Correct.

4 Q. So let's go to the repair orders. And what
5 we'll do is go one by one -- or date by date, I should
6 say. And I will ask you to walk me through some things
7 that occurred so you can help me understand what is on
8 the repair orders.

9 A. Okay.

10 Q. So we'll start -- they're kind of laid out for
11 you hopefully. And so we'll start with what's marked
12 as Exhibit 2 right there.

13 A. Okay.

14 Q. I will give you a second to familiarize
15 yourself with them.

16 A. Okay.

17 Q. So the customer -- on all these, the first
18 three jobs starts off, "The customer reports."

19 Would that have been something that you would
20 have taken the information of?

21 A. Yes.

22 Q. And that would have been the beginning when you
23 greet and you're asking those open-ended questions?

24 A. Yes.

25 Q. Then -- so, for example, the Job 1 is "Customer

1 reports intermittently the infotainment system locks
2 up."

3 What would you next do?

4 A. As far as the service writer's standpoint?

5 Q. Yes.

6 A. Give it to the technician so he can get it
7 diagnosed and find out what's wrong with it.

8 Q. And so in this case they performed an RA4 radio
9 update?

10 A. Yes.

11 Q. The tech did that. What -- what happens next
12 on your end?

13 A. When he is done with it, he verifies it's
14 fixed. And then he'll write a story on the computer of
15 what he did. And then he'll turn it in and he'll close
16 it out and call the customer to come pick it up.

17 Q. And so for the first two jobs, they're about
18 the radio?

19 A. Um-hum.

20 Q. The third is about this seat belt noise?

21 A. Yes.

22 Q. And it says "Verified by Jason"?

23 A. Yes.

24 Q. Can you walk me through how you would go about
25 verifying something like a seat belt retractor making

1 noise?

2 A. I believe I went for a ride with him, and he
3 showed me the noise.

4 Q. And what is the protocol for when you go on a
5 ride with the customer, test drive it?

6 A. There is no protocol. We just get in the car
7 and go for a ride with them.

8 Q. So it's up to you to decide when you go on a
9 test drive?

10 A. Um-hum.

11 MR. HADDAD: Is that yes?

12 THE WITNESS: Yes.

13 Q. BY MR. ISAACS: And on Job 3, second line up,
14 it says, "Steve Rodgers also tested."

15 A. Uh-huh.

16 Q. When do you approach Steve about --

17 A. Checking something?

18 Q. (Nodded head up and down.)

19 A. What we do is, if it's a customer that's come
20 in for a few -- few times for the same complaint, or we
21 know he's really picky, we'll let Steve go through the
22 car and make sure it's repaired correctly.

23 Q. And that brings me to my next question of: Is
24 there a system for notating repeat repairs?

25 A. Just in the database. There is really no

1 system other than just looking at the history of the
2 vehicle.

3 Q. So the system would be to -- tell me if this is
4 accurate. You have the past repair orders. So looking
5 at the past repair orders is the system for seeing if
6 there's repeat repairs?

7 A. Yes.

8 Q. We can go to the next set, which is --

9 A. 3?

10 Q. No. The next --

11 A. There's two sets within it.

12 Q. I've gotcha.

13 A. Okay.

14 Q. And on Job Number 1, it's about a rear hitch's
15 valance cover. And Steve takes pictures?

16 A. Yes.

17 Q. When does Steve take pictures? What is the
18 protocol there?

19 A. A protocol is basically Chrysler will have us
20 take pictures of any trim-type body parts or whatnot to
21 verify that there is an issue with them, and then
22 they'll authorize the repair.

23 Q. So are the pictures in response to requests
24 from Chrysler?

25 A. Yes.

1 Q. And Job 2 is low flow for an air-conditioner.

2 A. Uh-huh.

3 Q. Unable to verify.

4 Would that have been you that would have been
5 the verifier or the tech?

6 A. The technician.

7 Q. Let's go -- we can go to the next repair order.

8 Do you have August 8th in front of you?

9 A. I have August 9th.

10 Q. It's -- the question actually -- you answered
11 the question. RO date is August 8th?

12 A. Right.

13 Q. Invoice date is August 9th?

14 A. Yes.

15 Q. Does that mean to you that the car was out of
16 service for a day?

17 A. Yes. It wasn't closed out until the next day.

18 Q. And a part that previously -- that had been
19 requested was installed during this?

20 A. Yes.

21 Q. And when you need to order parts, what is your
22 protocol for ordering the parts and informing the
23 customer of when the parts come in?

24 A. What we do is we figure out what part it needs
25 first off. And then we can go into the database to see

1 if we need to take pictures of it or whatnot.

2 And if we don't, then we can just go ahead and
3 order the part. When the part comes in, we get a
4 notice that says the part's here. We give it to our
5 receptionist who then calls the customer and gives them
6 an appointment to bring it back in and get the parts
7 installed.

8 Q. We can move on from that repair order.

9 This one has a couple pages on it, four pages.
10 So we can separate them out into the first two, second
11 two.

12 So the first job is about a popping noise when
13 the brakes come on. Would you have road tested this,
14 or did you, based on the document in front of you?

15 A. I don't think I did.

16 Q. And what makes you think you didn't?

17 A. Because normally I would put on there "Jason
18 verified with customer" if I did.

19 Q. And when you cannot verify -- and by you I mean
20 the team, not specifically you -- it's your job to
21 relate that information, the nonverification to the
22 customer?

23 A. Yes.

24 Q. Do you give them any more information other
25 than they couldn't verify it?

1 A. I tell them what we did, you know. We drove it
2 such and such amount of miles. Check for codes and
3 whatever.

4 Q. So the next page there, a Number 2 for the seat
5 belt retractor -- I don't know if you remember on the
6 previous one there was also an issue with the seat belt
7 retractor.

8 A. Right.

9 Q. And this one was verified. And a new part was
10 ordered on this visit?

11 A. Yes.

12 Q. Would you have still gone -- would you have
13 been on the test drive with him for this?

14 A. It depends. Sometimes I do. And sometimes
15 I'll get the technician to go for a ride with them.

16 Q. And when a new part was ordered on this and a
17 couple of others, how do you actually notify the
18 customer when the part comes in?

19 A. We get a slip from parts that says the part
20 showed up. And then we give it to our receptionist who
21 then calls the customer and schedules an appointment.

22 Q. And if you turn to the last page, it says,
23 "Perform rapid response transmittal service action."

24 What is a rapid response transmittal service
25 action?

1 A. It's basically -- it's not a recall, but it's
2 right up there with a recall that Chrysler puts out.
3 If they experience a lot of vehicles with a certain
4 issue, they will put out the rapid response
5 transmittal. Say, Hey, if you get a vehicle in here
6 with these kinds of issues, this is what you need to do
7 to fix it.

8 Q. And are -- whether or not the vehicle is due
9 for or has a rapid response transmittal service action
10 that it needs to be performed on the vehicle, is that
11 routinely done every time a customer comes in?

12 A. We can only do it if it's under the basic
13 warranty of three years or 36,000 miles.

14 Q. And if it's not under that warranty, is it --
15 are you able to do it if a customer requests it?

16 A. They would have to pay for it.

17 Q. And then there was a software update on the Job
18 Number 2 on the last page?

19 A. Uh-huh.

20 Q. Is it the tech that would perform the software
21 update?

22 A. Yes.

23 Q. Go to the next repair order.

24 What date do you have?

25 A. I have 1-24-14.

1 MR. ISAACS: Off record for one second.

2 (Discussion off the record.)

3 Q. BY MR. ISAACS: So on this date, "Customer came
4 in for a Chrysler notification recall"?

5 A. Um-hum.

6 Q. How would a customer get notified of recalls,
7 to the best of your knowledge?

8 A. Usually --

9 MR. HADDAD: Lacks of foundation. Calls for
10 speculation.

11 Go ahead. Go ahead.

12 THE WITNESS: Usually by mail. They'll get a
13 notice through the mail.

14 Q. BY MR. ISAACS: Is checking for recalls -- is
15 that done as a matter of course?

16 A. Yes. Any time a vehicle comes in the shop, we
17 check for recalls.

18 Q. And if you turn to the second page on it --

19 A. Um-hum.

20 Q. -- where the customer is complaining that his
21 "backup camera has been glitchy."

22 A. Uh-huh.

23 Q. And Chrysler, "The next update will repair this
24 issue."

25 A. Yes.

1 Q. Would you have written that? Is that --

2 A. That was the technician.

3 Q. Okay. Next repair. Do you have 6-17 in front
4 of you?

5 A. Yes, I do.

6 Q. The first thing that's done is a rapid response
7 transmittal service action again.

8 A. Um-hum.

9 Q. And so we can go now to the next page, which is
10 a brake booster issue.

11 A. Yes.

12 Q. This is an issue that, your understanding, is a
13 repair the customer had, or that was an issue with the
14 customer's vehicle in general?

15 A. It's a recall.

16 Q. And the recall is performed on this date or on
17 a later date?

18 A. A later date. We didn't have the parts at the
19 time.

20 Q. And in those circumstances, when a customer
21 comes for a recall and you don't have the parts, what
22 is the protocol on your end when you discuss it with
23 the customer?

24 A. Same thing. I just let them know that parts
25 are on order. As soon as the parts come in, We'll give

1 you a phone call and get you back in here.

2 Q. And the next page on that same date, 6-17, is
3 again about the camera?

4 A. Uh-huh.

5 Q. Which is a previous concern the customer
6 requested?

7 A. Yes.

8 Q. Do you have any -- when a customer comes in and
9 specifically complains about the same thing, is there
10 any special protocol or things that you do?

11 A. Normally if we get a customer that has come in
12 more than once, I will put a VIP stamp on the repair
13 order so the technicians know that, hey, this is not
14 the first time.

15 Q. And where would you put that VIP stamp?

16 A. Right on top of the repair order.

17 Q. And the VIP stamp stands for what?

18 A. Very important person.

19 Q. Really?

20 A. Yes.

21 Q. Okay. On the second repair order on that page
22 when it talks about the oil level being dirty --

23 A. Yes.

24 Q. -- and the record indicates that it has been
25 almost 9,000 miles in between oil changes, according to

1 the repair order --

2 A. Yes.

3 Q. -- how would that information be -- on your
4 end, how would you give that information to the
5 customer?

6 A. I would let him know that, It appears your
7 engine oil hasn't been changed in 9,000 miles and we
8 suggest doing it.

9 Q. But do you provide -- in the manuals that the
10 customer gets, when they get a vehicle, it gives
11 recommended maintenance?

12 A. (Nodded head up and down.)

13 Q. Among that recommended maintenance is oil
14 changes?

15 A. Correct.

16 Q. Does your dealership -- do you recommend any
17 different schedule of oil changes than what's in the
18 booklets?

19 A. Sometimes we do.

20 Q. And when would you?

21 A. When the customer comes in and is requesting a
22 major service or whatnot. Because we do a more
23 comprehensive service than what Chrysler offers.

24 Q. And if you did tell a customer he needs to,
25 let's say, as an example, change his oil more

1 frequently than the manual states, would that be in the
2 repair order?

3 A. Yes.

4 Q. And if you -- you answered the question fine.

5 We can move on to the next one. 11-05-13.

6 A. Got it.

7 Q. Now the first performed lube oil filter, that's
8 routine maintenance, correct?

9 A. Yes.

10 Q. Is that something a customer has to request, or
11 is that done on a regular schedule when the customer
12 brings in the vehicle?

13 A. Typically we'll recommend it if they don't
14 suggest it, if we notice that it's due. And we will
15 say something. But it doesn't automatically come up
16 type thing.

17 Q. We can go to the next one, which is 1-24-14.

18 MR. HADDAD: Off the record for a second.

19 (Discussion off the record.)

20 Q. BY MR. ISAACS: So the next -- maybe we can put
21 an exhibit sticker on that if it's not in there. It
22 would be out of order.

23 MR. HADDAD: You want to reserve it, and we
24 will mark it as 20 if we don't --

25 MR. ISAACS: Yeah, we'll get to it.

1 Q. BY MR. ISAACS: So the next repair order, 1-24.
2 Can you just explain based on the repair order what --
3 what occurred on that date?

4 A. Basically we went ahead and updated the
5 antilock break control module. And then we went ahead
6 and checked the alternator ground wire to make sure it
7 was tight. And also updated the instrument cluster
8 software.

9 Q. On this one there was the N58. Is that a
10 recall?

11 A. That's a recall, yeah.

12 MR. HADDAD: For the record, it's marked as
13 Exhibit 5.

14 MR. ISAACS: Okay.

15 Q. BY MR. ISAACS: I think that's it for that.

16 And then on the second page, it will say, "The
17 customer's backup camera is glitchy."

18 A. Yes.

19 Q. Is that something that was verified based on
20 your understanding of the repair order?

21 A. Yes.

22 Q. We can go to the next one, which is 7-24- --
23 sorry, 7-22-2014. So on this one, the RO date is 7-22
24 and the invoice is 7-30.

25 A. Yes.

1 Q. So basically the car was out of service for
2 eight days?

3 A. Yes.

4 Q. When the customer came in, the complaint for
5 blue smoke, would that have been the tech that checked
6 it out or --

7 A. Yes.

8 Q. And the tech found a TSB. Would that be,
9 again, the tech finding the TSB, or do you look for the
10 TSB as a service advisor?

11 A. No. The technicians.

12 Q. Go to the next page on it. When a customer is
13 due a rental car, what is the protocol for -- let me
14 strike that question and ask it this way.

15 What's the protocol for when a customer gets a
16 rental car?

17 A. Chrysler won't pay for ultimate transportation
18 unless the customer has an extended service contract
19 that pays for it.

20 Q. If they have the extended service contract,
21 what is the protocol then for when they get a rental
22 car?

23 A. Well, it depends on which kind of plan they
24 have. Generally, most of them have what they call
25 first-day rental, which means any time they bring their

1 vehicle in for service, they can get a free rental car.

2 Q. And then there was the brake booster on Page 4
3 of this. And this relates to the previous brake
4 booster recall, I think?

5 A. Yes.

6 Q. And so this is when the parts came in and it
7 was done?

8 A. Yes.

9 Q. And below that there is a fluid leak?

10 A. Yes.

11 Q. The tech would have been the one to verify it?

12 A. Yes.

13 Q. And the last one, there is a rapid response
14 transmittal service action?

15 A. Yes.

16 Q. And so there was a software update?

17 A. Yes.

18 Q. Let's go to the next one, 2-11-15. Customer
19 reports that he smelled coolant. They found a water
20 pump to be leaking.

21 When the customer reports he smells coolant, is
22 there -- do you verify that?

23 A. No. Technician.

24 Q. And on the last page of it there is a part
25 that's specially ordered for the knob.

1 Is it your job to do the actual ordering, or is
2 that somebody else's?

3 A. That would be the technician.

4 Q. And then there's a safety recall for a sun
5 visor wiring.

6 A. Yes.

7 Q. And that would be something that would be
8 checked when he brings the vehicle in?

9 A. Yes.

10 Q. Then lastly, there's a navigation issue where a
11 new media center was ordered.

12 A. Oh, yes.

13 Q. Verified that.

14 And then there is even a couple more issues
15 later where there's a cargo cover ordered and rubber
16 pad ordered.

17 A. Uh-huh.

18 Q. Again, would that be something the tech would
19 confirm?

20 A. Yes.

21 Q. All right. Go on to the next one, 2-25.

22 So the first two jobs are related to parts
23 coming in, it looks like?

24 A. Yes.

25 Q. So you would have then previously, according to

1 the way the system works, notified the customer that
2 the parts were coming in so he could then bring the car
3 in on that date?

4 A. Yes.

5 Q. Okay. So the next page of the 2-25 is about
6 "the customer smells coolant."

7 And -- I'll wait for you to flip to it. It's
8 Page 1 of 2 on the 2-25.

9 And it was unable to be verified?

10 A. Yes.

11 Q. So basically walk me through, based on this,
12 what you would have -- how that would have gone for you
13 when a customer comes in, they smell coolant, and the
14 tech can't verify it. What is your next step?

15 A. What I do is the technician will usually come
16 up to me and say, I can't verify this. And I will go
17 out there with the technician and take a look at it
18 with them to get a second set of eyes and just verify
19 that there's nothing wrong with it.

20 Q. Okay. And the navigation, looks like it's on
21 Job 4, "locking up again"?

22 A. Uh-huh.

23 Q. Strike that question. That's fine.

24 Go to the next repair order, 3-10, Job 1 on
25 3-10. The customer is still smelling coolant.

1 In this kind of occasion would you expect there
2 to be like a VIP sticker, as you described it?

3 A. Yes.

4 Q. And do you have any special protocols for an
5 occasion like this where the customer is coming in for
6 repeated concerns, both of which were unverified?

7 A. Usually what we will do is get one of our
8 managers involved.

9 Q. And when that occurs, is that notated on the
10 repair order?

11 A. Yes.

12 Q. It's not notated on the repair order, correct?

13 A. Correct.

14 Q. And on Job 3 -- actually, let's go to the
15 Job 2. The radio was replaced, and then there was an
16 internal failure of the replacement.

17 A. Um-hum.

18 Q. Do you have an estimation, based on your
19 experience in working, how often that occurs, the radio
20 specifically?

21 MR. HADDAD: Calls for speculation.

22 THE WITNESS: Probably one out of every 20
23 radios, would be my guess.

24 Q. BY MR. ISAACS: Guess or estimation?

25 A. Estimation. Sorry.

1 Q. And then lastly, the customer reports that
2 since the last visit he has been having issues related
3 to this clip, which appears from a -- based on a
4 previous repair order.

5 A. Yes.

6 Q. When the issue is related to work that the tech
7 did, what is the protocol there on your end?

8 A. Same thing. I get a VIP stamp, talk to the
9 technician about it, and make sure he gets it
10 corrected.

11 Q. Okay. We can move on from that repair order.
12 We can go to 3-13.

13 A. Okay.

14 Q. Two installations, again, for new parts that
15 came in?

16 A. Yes.

17 Q. Okay. That's it.

18 3-25. On Job 1, again, it's about the
19 navigation. Navigation is an electrical issue,
20 correct?

21 A. Yes.

22 Q. For repeated concerns about an electrical
23 issue, is there any protocol for trying to delve in
24 deeper if there's a deeper electrical problem?

25 A. What we can do is get Star involved, which is

1 Chrysler's technical support.

2 Q. And how would you get Star involved?

3 A. We just go in online. We can submit a claim
4 online with a VIN number and let them know what we're
5 doing, and then they'll get back to us.

6 Q. And would that be notated if you do that?

7 A. Yes.

8 Q. And that would be notated in tech comments?

9 A. Yes.

10 Q. Have you seen any notation related to getting
11 Star involved yet?

12 A. No.

13 Q. And no notation related to any notation about
14 customer's bad maintenance, misuse or aftermarket parts
15 either, correct?

16 A. Yes.

17 Q. Let's move on to 4-02. Part came in. Was the
18 washer fluid --

19 A. Yes.

20 Q. -- put in?

21 A. Yes.

22 Q. Beautiful.

23 4-10. Now do you -- let me ask you this
24 question: Do you check for DCTs or is that the tech?

25 A. Technician.

1 Q. And it looks like on 4-10 there was an
2 electrical issue related to the headlights?

3 A. Yes.

4 Q. All right. Go on to the next one, 12-03. The
5 first page is a rental car --

6 A. Yes.

7 Q. -- invoice.

8 The next page relates to navigation system
9 still, correct? That relates to the navigation issue?

10 A. Yes.

11 Q. And the software update was performed?

12 A. Yes.

13 Q. Tech performs software updates?

14 A. Yes.

15 Q. When the vehicle comes in, is it automatic that
16 it's checked to see if there are updates in the
17 software?

18 A. 99 percent of the time, yes.

19 Q. We can move on to the next repair order.

20 Sorry. I wanted to ask a question about the
21 second-to-last -- Job 3 was the stitching of the
22 steering wheel?

23 A. Yes.

24 Q. And there is some -- I will let you read it in
25 a second.

1 But there is some back and forth over whether
2 or not it would be covered, as I understand it, based
3 on the repair order?

4 A. Yes.

5 Q. And can you walk me through that process of
6 getting -- finding out how to get it covered or not?

7 A. What we need to do is -- because it's a trim
8 item, we have to take a picture of it and send it into
9 Chrysler and show them the flaw. And then at that
10 point they'll make a decision as to whether or not
11 they're going to replace it or not.

12 Q. Then the next one, which is 1-14-2016 --

13 A. Yes.

14 Q. -- again, "customer smelling coolant."

15 This would be something that should have had a
16 VIP sticker, as I understand it?

17 A. Yes, uh-huh.

18 Q. Then on Job Number 3 it was an unverified
19 problem with the fuel door. And Normandin added
20 lubricant.

21 Would that be -- who would decide that that
22 would be a proper course of action?

23 A. Technician.

24 Q. Go to the next one, 1-18. So there's a little
25 bit of confusion here. The RO date on this is 1-18,

1 and the invoice date is 2-11.

2 A. I don't have that one.

3 Q. Do you see what I'm saying, where it says the
4 RO date 1-18 and the invoice date 2-11?

5 A. No.

6 MR. HADDAD: This one.

7 THE WITNESS: Yes.

8 Q. BY MR. ISAACS: Do you have an understanding of
9 what happened there?

10 A. No. I don't remember.

11 Q. So on the next one, which is the two -- RO date
12 where it's open on 2-10, the invoice is 2-11, on Job 1,
13 if you'll see -- three lines down from the top it says
14 "See history."

15 A. Yes.

16 Q. Is that a notation -- why would a notation be
17 made of "See history"?

18 A. That lets the technician know it's been in
19 before for that issue as well.

20 Q. So is that -- would have been something you
21 would have notated?

22 A. Yes.

23 Q. And would the process have been to look at past
24 repair orders to find that out?

25 A. Yes.

1 Q. And then there was a Star case found on that?

2 A. Yes.

3 Q. Is the fact that you wrote, "See history on
4 this" and there was a Star case opened on this -- I
5 don't believe there was a previous Star case opened --
6 is that usually -- do they go hand-in-hand?

7 A. Yes.

8 Q. And why is that? What is that process for them
9 going hand-in-hand?

10 A. As far as the Star case?

11 Q. Yes.

12 A. They tell us how to fix the vehicle basically.

13 Q. And if it's a repeat repair, the "See history,"
14 does that trigger though that one should look at the
15 Star?

16 A. No. No. That's just a technician to say, I
17 need to look at the history to see if it was in before,
18 see if we can fix it.

19 Q. We can go to the last one, then, 3-23. The
20 washer hose had a kink in it on Job Number 2.

21 Would this be something that you would have
22 checked out, or would that be the technician?

23 A. Technician.

24 Q. That's all the repair orders and all the
25 questions I have.

1 MR. HADDAD: I don't have any.

2 COURT REPORTER: Copies for both?

3 MR. ISAACS: Please.

4 MR. HADDAD: Sure.

5 -o0o-

6 (WHEREUPON, the deposition was

7 concluded at 2:09 p.m.)

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1 DECLARATION UNDER PENALTY OF PERJURY

2
3
4 I, JASON HORWOOD, do hereby certify under
5 penalty of perjury that I have read the foregoing
6 transcript of my deposition taken on October 22, 2018;
7 that I have made such corrections as appear noted on
8 the Deposition Errata Page, attached hereto, signed by
9 me; that my testimony as contained herein, as
10 corrected, is true and correct.

11
12 Dated this _____day of_____,
13
14 20____, at _____, California.

15
16
17
18 _____
19 JASON HORWOOD
20
21
22
23
24
25

1 I, AUDREY S. KLETTKE, duly authorized to
2 administer oaths pursuant to Section 2093(b) of the
3 California Code of Civil Procedure, do hereby certify
4 that the witness in the foregoing deposition was by me
5 duly sworn to testify the truth in the within-entitled
6 cause; that said deposition was taken at the time and
7 place therein cited; that the testimony of said witness
8 was reported by me and thereafter transcribed under my
9 direction into typewriting; that the foregoing is a
10 complete and accurate record of said testimony; and
11 that the witness was given an opportunity to read and
12 correct said deposition and to subscribe the same.

13 Should the signature of the witness not be
14 affixed to the deposition, the witness shall not have
15 availed himself of the opportunity to sign or the
16 signature has been waived.

17 I further certify that I am not of counsel nor
18 attorney for any of the parties in the foregoing
19 deposition and caption named nor in any way interested
20 in the outcome of the cause named in said caption.

21
22
23 DATED:

24 OCTOBER 30, 2018

AUDREY S. KLETTKE
CSR No. 11875

ERRATA SHEET

If any corrections to your deposition are necessary, indicate them on this sheet, giving the change, page number, line number and reason for change.

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Signature of Deponent

Date

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