**Opinions of defendant’s expert, Dr. Potma**

An undated biomech summary without author identification, found in the Potma Docs folder, was provided for review. In the summary it said that Mr. Bradshaw would opine on delta V and the EDR download of the Chevrolet (no information has been provided from him regarding this information). Dr. Potma opined that Mr. Suber was not injured in the subject crash beyond that of temporary muscle strains. The forces experienced in the subject crash by him are comparable to benign, non-injurious everyday activities, and that these forces were below the tolerance for injury. The basis for Dr. Potma’s opinions was primarily her comparison of the forces of the crash to those of everyday activities, such as walking, coughing or sitting relaxed (based on the tables/graphs in the summary), and citation to studies involving real-world crash data, live human volunteers, anthropomorphic test devices, cherry picked from the literature to obscure the well-established actual risk of injury from the subject crash. Dr. Potma’s methods are aptly described as “junk science,” and her conclusion from the application of such methods utterly meaningless, irrelevant to any facts related to Mr. Suber’s health, and misleading.

Dr. Potma’s substantive conclusions can be summarized as follows:

* The Chevrolet experienced a delta V of 4 mph or less (based on a reconstruction by Jeff Bradshaw, but his method is not known and none of his work has been provided) and the PDOF was forward and rightward.
* Mr. Suber would have moved leftward initially at a speed near the delta V of 4 mph which was equivalent to the walking speed of a typical adult. Contact between his head, left shoulder, and left arm with the interior of the vehicle would be unlikely, but cannot be excluded.
* Mr. Suber would have then experienced a slower subsequent motion to the right before rocking back into a neutral seated position.
* The mechanism of injury for temporary muscle strains of the cervical and lumber spine would be consistent with his motions.
* Mr. Suber’s head accelerations would be well below those associated with concussion or mtbi.
* Direct contact to Mr. Suber’s TMJ’s would not be expected, and traumatic injury would not be consistent with the dynamics of the crash.
* The mechanism of injury for traumatic intervertebral disc disruptions for the cervical and lumbar spine was not present in the subject crash.
* The motions and compressive loads to the lumbar spine were comparable to common physical activities and progression or structural aggravation of pre-existing degenerative changes would not be expected. The loads to the cervical spine may have approached, or exceeded common physical activities, but remained below that associated with structural failure.
* The mechanism for knee injury was not present in the subject crash.
* The mechanism for injury to the shoulder (traumatic tearing and sprain of the rotator cuff) was not expected to be involved in the subject crash. However, aggravation of a pre-existing condition cannot be entirely excluded.
* The mechanism of injury for temporary muscle strains and ligament sprains of the wrist cannot be entirely excluded.
* 43 studies/publications were cited.