**Opinions of defendant’s expert, Dr. Ying Lu (J.S. Held)**

Dr. Lu provided an opinion that the forces experienced in the subject collision by Ms. Knight are comparable to benign, non-injurious everyday activities. The basis for Dr. Lu’s opinions was primarily her comparison of the forces of the crash to those of daily activities, and citation to studies involving human volunteers, cherry picked from the literature to obscured the well-established actual risk of injury from the subject collision. Dr. Lu’s methods are aptly described as “junk science,” and his conclusion from the application of such methods utterly meaningless, irrelevant to any facts related to Ms. Knight’s health, and misleading.

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

* Based on crush analysis of the Toyota Yaris, she calculated the upper limit delta-V of the Harley Davidson was 2.5 mph (1.7 – 2.5 mph) and an upper limit impact closure speed of 2.8 mph (1.9 – 2.8 mph) with peak acceleration levels of 1.3 – 1.9 g’s for Ms. Knight’s lumbar spine and 2.6 – 3.8 g’s for her cervical spine.
* Dr. Lu’s described published experimental studies involving human volunteers as a basis for claiming no mechanism of injury existed.
* She claimed the forces of daily living, such as plopping into a low-back office chair, jumping forward from one stair riser to another, and a rear end collision in a bumper car, had comparable G forces as Ms. Knight experienced during the subject collision. But acknowledge the forces in those examples were more vertical than horizontal, as were experienced in the subject collision.
* Dr. Lu gave no opinions on injury causation.