

EXHIBIT G

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF QUEENS

X
JOSE AYBAR, ORLANDO GONZALES, JOSE
AYBAR as Administrator of THE ESTATE OF
CRYSTAL CRUZ-AYBAR, Jesenia Aybar as
Administrator of THE ESTATE OF NOELIA
OLIVERAS, Jesenia Aybar as Legal Guardian on
behalf of KEILA CABRAL, a minor, Anna Aybar
and Jessica Aybar as Proposed Administratrix of
THE ESTATE OF TIFFANY CABRAL,

AFFIDAVIT OF
ROBERT PASCARELLA

Index No. 703632/2017 [E-Filed]

Plaintiffs,

Previously Index No. 9344/2014

- against -

US TIRES AND WHEELS OF QUEENS, LLC,
Defendant.

X
US TIRES AND WHEELS OF QUEENS, LLC,
Third-Party Plaintiff,

- against -

THE GOODYEAR TIRE & RUBBER
COMPANY; GOODYEAR DUNLOP TIRES
NORTH AMERICA, LTD; and FORD MOTOR
COMPANY,

Third-Party Defendants.

X
STATE OF Michigan)
:ss:
COUNTY Wayne)

ROBERT PASCARELLA, being duly sworn, deposes and says:

1. My name is Robert Pascarella. I am over the age of 18, have personal knowledge of the matters set forth in this Affidavit unless otherwise stated, and if called as a witness, I

would be competent to testify to the matters in this Affidavit. The facts stated in this Affidavit are true and correct.

2. I am employed with Ford Motor Company ("Ford") as a Design Analysis Engineer. My responsibilities involve conducting investigations of vehicle crashes, in addition to vehicle testing and technical analysis to evaluate claims made regarding contributing factors to those crashes. As a result of my tenure with Ford, I am familiar with Ford's business operations in the United States, and the location of Ford's manufacturing facilities. I am also familiar with the records that Ford maintains concerning the vehicles it builds.

3. Ford is in the business of designing and manufacturing new vehicles and trucks.

4. Ford was incorporated in the State of Delaware and its principal place of business is in Dearborn, Michigan.

5. The Ford vehicle described in the Complaint that forms the basis of this third-party action by U.S. Tires and Wheels of Queens, LLC ("U.S. Tires") was a 2002 Ford Explorer Eddie Bauer with Vehicle Identification Number 1FMDU74WX2ZB89795 (the "Subject Vehicle"). According to Ford's records, the Subject Vehicle was assembled at Ford's St. Louis Assembly Plant in Missouri on or about February 11, 2002. Those same records reflect that the Subject Vehicle was sold on March 11, 2002 to Ford dealer Team Ford Lincoln, located in Steubenville, Ohio, and subsequently purchased by an individual owner who is not the owner alleged in the Complaint.

6. The Subject Vehicle was not originally sold by Ford in the State of New York.

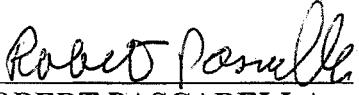
7. The Subject Vehicle was primarily designed by Ford in Michigan, not New York.

8. Ford does not have any Ford Explorer manufacturing plants in the State of New York.

I declare under penalty of perjury under the laws of the State of New York that the

foregoing is true and correct.

Executed this 28 day of January, 2019, at 10:30 am.

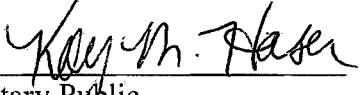

ROBERT PASARELLA

Ford Motor Company

STATE OF Michigan)
:ss:
COUNTY Wayne)

On this 29 day of January, 2019, before me, the undersigned, a notary public in and for said state, personally appeared ROBERT PASARELLA personally known to me or proved to me on the basis of satisfactory evidence to be the individual whose name is subscribed to the within Affidavit and acknowledged to me that he executed the same in his capacity, and that by his signature on the within Affidavit, the individual or the person upon behalf of which the individual acted, executed the Affidavit.

Sworn to before me this
28 th day of January, 2019


Notary Public

