

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEBRASKA

FRANCO RIBEIRO and DEANNA RIBEIRO, )  
 as individuals and as next friends and )  
 biological parents of LUCAS RIBEIRO, an )  
 infant, )  
 )  
 Plaintiffs, )  
 )  
 vs. )  
 )  
 BABY TREND, INC., et al. )  
 )  
 Defendants. )

Case No. 8:12-cv-00204

**AMENDED ORDER**  
**ON PRETRIAL CONFERENCE**

A final amended pretrial conference was held on the 17th of April, 2017. Appearing for the parties as counsel were:

For Plaintiffs: Michael Coyle, Jordan Adam, and Emily Wischnowski, Fraser Stryker PC LLO.

For Defendants Indiana Mills & Manufacturing, Inc. ("IMMI"): Randall R. Riggs and Matthew R. King, Frost Brown Todd, LLC; Ronald F. Krause, Cassem Tierney Adams Gotch & Douglas.

For Defendants Lerado Group Co., Ltd., Lerado Group (Holding) Co., Ltd., Lerado (Zhong Shan) Industrial Co., Ltd., Lerado China Ltd., Lerado HK Ltd. (collectively, "Lerado Defendants"); Dorel Industries, Inc.; and Maxi Miliaan B.V.: Jeff Wright and Jessica Uhlenkamp, Heidman Law Firm, LLP.

**(A) Exhibits.** Each of the parties' amended exhibit lists is attached and is incorporated by reference herein. The exhibits are objected to as specified on each Exhibit List, except for objections under Fed. R. Evid. 402 and 403, which are reserved until trial, per NECivR 16.1(a)(1)(A). Any party may offer any exhibit listed on any exhibit list, even if that exhibit is not included on that party's exhibit list. The mere listing of an exhibit on a party's exhibit list does not mean it can be offered into evidence by the adverse party without all necessary evidentiary prerequisites being met first.

The parties have agreed they will exchange with each other their objections to the exhibits on any other party's exhibit list by April 17, 2017, at 10:30 a.m. The parties stipulate that the non-subpoenaed records that Defendants (as well as Baby Trend, Inc., Millenium Development Corp., and Mark Sedlack) have produced from their records in

this lawsuit are authentic and are business records within the meaning of FED. R. EVID. 803(6).

**(B) Uncontroverted Facts.** The parties have agreed that the following may be accepted as established facts for purposes of this case only:

1. Plaintiffs Franco Ribeiro and Deanna Ribeiro are husband and wife and the biological parents of Lucas Ribeiro, an infant born on October 1, 2010, (collectively "Ribeiro Family"), and are residents of the State of Nebraska. Franco and Deanna Ribeiro have brought this action on behalf of themselves and on behalf of Lucas Ribeiro as his next friends.

2. Defendant Indiana Mills & Manufacturing, Inc. ("IMMI") is an Indiana corporation that conducts business throughout the United States.

3. Defendants Lerado Group Co., Ltd., Lerado Group (Holding) Company, Ltd., Lerado (Zhong Shan) Industrial Co., Ltd., Lerado China Limited, and Lerado H.K. Limited (collectively, "Lerado"), are Chinese corporations.

4. Baby Trend, Inc. ("Baby Trend") is a California corporation who conducts business throughout the United States. Baby Trend marketed, sold and distributed its Baby Trend FLEX-LOC Infant Car Seat Model No. 6325 ("Car Seat") through retail stores in the State of Nebraska.

5. Mark Sedlack is an individual residing in the State of Ohio, and Millenium Development Corp. is an Ohio corporation.

6. The Car Seat at issue in this lawsuit was manufactured on February 28, 2006, at a Lerado facility in China.

7. Lucas Ribeiro was born a healthy male twin on October 1, 2010. He and his twin brother, Alex, lived in Kearney, Nebraska with their parents, Franco and Deanna Ribeiro.

8. Lucas Ribeiro was injured in the Car Seat on May 27, 2011, in Kearney, Nebraska.

**(C) Controverted and Unresolved Issues.** The issues remaining to be determined and unresolved matters for the court's attention are:

### **PLAINTIFFS' STATEMENT OF ISSUES**

The following are the issues that Plaintiffs contend are remaining to be determined and/or are unresolved (Defendants object to Plaintiffs' characterization of these alleged issues, the claims that Plaintiff's make in the alleged issues, and contest

the accuracy of the elements of the causes of action set forth in Plaintiffs' statement of issues):

1. Plaintiffs' First Cause of Action: Negligence - Failure to Use Reasonable Care

- a. Whether Defendants designed, manufactured, supplied, sold, and/or distributed the Car Seat and/or components parts for the Car Seat.
- b. Whether Plaintiffs were those who used the Car Seat for a purpose for which the designer, manufacturer, and/or supplier should expect it to be used or those whom the designer, manufacturer, and/or supplier should expect to be endangered by its intended use.
- c. Whether Defendants failed to use reasonable care:
  - i. To see that the Car Seat was safe for the use for which it was made; or
  - ii. By knowing or having reason to know that the Car Seat was dangerous when put to the use for which it was made and that those for whose use the Car Seat was made would not realize the danger, and failing to provide an adequate warning of that danger;
- d. Whether Defendants' failure to use reasonable care was a proximate cause of some damage to Plaintiffs; and
- e. The nature and extent of Plaintiffs' damages.

2. Plaintiffs' First Cause of Action: Negligence - Failure to Warn

- a. Whether Defendants designed, manufactured, supplied, sold, and/or distributed the Car Seat and/or components parts for the Car Seat;
- b. Whether Plaintiffs were those who used the Car Seat for a purpose for which the designer, manufacturer, and/or supplier should expect it to be used or those whom the designer, manufacturer, and/or supplier should expect to be endangered by its intended use;
- c. Whether Defendants knew or had reason to know that the Car Seat was likely to be dangerous when put to the use for which it was designed, manufactured, supplied, sold, and/or distributed;
- d. Whether Defendants knew or had reason to know that those for whose use the Car Seat was designed, manufactured, supplied, sold, and/or distributed would not realize the danger;

- e. Whether Defendants failed to provide reasonably foreseeable users of the Car Seat with adequate warning of that danger;
  - f. Whether this failure to warn reasonably foreseeable users of the Car Seat of the danger was a proximate cause of some damage to Plaintiffs; and
  - g. The nature and extent of that damage.
3. Plaintiffs' Second Cause of Action: Strict Liability – Design and/or Manufacturing Defect
- a. Whether Defendants placed the Car Seat on the market;
  - b. Whether, at the time the Car Seat left Defendants' possession, it was defective in one or more of the ways claimed by Plaintiffs;
  - c. Whether the Car Seat's defects made it unreasonably dangerous for its intended use, or for any use the defendants could have reasonably foreseen;
  - d. Whether the Car Seats defects were a proximate cause of some damages to Plaintiffs; and
  - e. The nature and extent of Plaintiffs' damages.
4. Plaintiffs' Third Cause of Action: Strict Liability – Failure to Warn
- a. Whether Defendants placed the Car Seat on the market;
  - b. Whether, at the time the Car Seat left Defendants' possession, it failed to warn or protect against a danger or hazard in the use, misuse, or intended use of it, or the failure to provide proper instructions for the use of it;
  - c. Whether the Car Seat's inadequate warnings made it unreasonably dangerous for its intended use, or for any use the defendants could have reasonably foreseen;
  - d. Whether the Car Seats inadequate warnings were a proximate cause of some damages to Plaintiffs; and
  - e. The nature and extent of Plaintiffs' damages.
5. Plaintiffs' Fourth Cause of Action: Breach of Express Warranty
- a. Whether Defendants sold the Car Seat;

- b. Whether Defendants expressly warranted that the Car Seat was safe and reasonably fit for its intended purpose to hold and carry infants;
  - c. Whether Plaintiffs are persons who could have been expected to use, consume, or be affected by the Car Seat;
  - d. Whether the Car Seat did not conform to the warranty, the Car Seat was not in compliance with the warranty, the Car Seat was not as it was warranted to be, or the Car Seat failed to perform as warranted;
  - e. Whether, within a reasonable time after Plaintiffs discovered Defendants' breach, they gave Defendants notice of the breach;
  - f. Whether Defendants' breach was a proximate cause of some damage to the Plaintiffs; and
  - g. The nature and extent of Plaintiffs' damages.
6. Plaintiffs' Fifth Cause of Action: Breach of Implied Warranty of Merchantability
- a. Whether Defendants sold the Car Seat;
  - b. Whether, at the time of the sale of the Car Seat, Defendants were merchants with respect to goods of that kind;
  - c. Whether, at the time the Defendants sold the Car Seat, it was not merchantable;
  - d. Whether, within a reasonable time after Plaintiffs discovered Defendants' breach, they gave Defendants notice of the breach;
  - e. Whether Defendants' breach was a proximate cause of some damage to the Plaintiffs; and
  - f. The nature and extent of Plaintiffs' damages.
7. Plaintiffs' Sixth Cause of Action: Breach of Implied Warranty for Particular Purpose
- a. Whether Defendants sold the Car Seat;
  - b. Whether, when the sale was made, Plaintiffs purchased the Car Seat for the purpose of safely holding and carrying an infant;
  - c. Whether, when the Car Seat was sold, Plaintiffs were relying on Defendants' skill or judgment to furnish a car seat suitable for that purpose and Defendants had reason to know of this reliance;

- d. Whether, at the time the Car Seat was delivered by Defendants, it was not fit for the particular purpose in question;
  - e. Whether, within a reasonable time after Plaintiffs discovered the Car Seat was not fit for the particular purpose, Plaintiffs gave Defendants notice of the breach;
  - f. Whether the breach of this warranty was a proximate cause of some damages to Plaintiffs; and
  - g. The nature and extent of Plaintiffs' damages.
8. Plaintiffs' Seventh Cause of Action: Magnuson Moss Act
- a. Whether Defendants breach of expressed warranties and implied warranties is a violation of the Magnuson Moss Act, 15 U.S.C. § 2301 et seq.
  - b. Whether Defendants failed to comply with their obligations under their implied warranties;
  - c. Whether within a reasonable time after Plaintiffs discovered Defendants' breach, they gave notice to Defendants of their breach of express and implied warranties;
  - d. Whether the breach of this warranty was a proximate cause of some damages to Plaintiffs; and
  - e. The nature and extent of Plaintiffs' damages.
9. Whether Defendants were negligent in failing to use reasonable care in designing, manufacturing, marketing, labeling, packaging, testing, and selling the Car Seat.
10. Whether Defendants were negligent in failing to use reasonable care to see that the Car Seat was safe for its intended use.
11. Whether Defendants failed to warn reasonably foreseeable users that the Car Seat was dangerous when put to the use for which it was made.
12. Whether Defendants are designers and/or manufacturers.
13. Whether Defendants are apparent designers and/or manufacturers.
14. Whether Plaintiffs are entitled to recover attorneys' fees and costs for prevailing on their Magnuson-Moss Claim, under 15 U.S.C. § 2310(d)(2). (**For the Court**).

15. Whether Defendants Maxi Miliaan B.V. and Dorel Industries, Inc., are liable as successors in interest to Defendants Lerado Group Co., Ltd., Lerado Group (Holding) Co., Ltd., Lerado (Zhong Shan) Industrial Co., Ltd., Lerado China Ltd., Lerado HK Ltd. ("Lerado Defendants") for each and every action or inaction applicable to the Lerado Defendants.
  - a. The Lerado Defendants object to inclusion or any reference to successor liability in this matter pursuant to the Court's bifurcation order entered December 29, 2015. (Docket Entry 324).
16. Whether and to what extent the Defendants are jointly and severally liable for Plaintiffs' injuries and damages.
17. Whether Defendants acted in concert as part of a common enterprise or plan that caused harm to Plaintiffs.
18. Whether Deanna Ribeiro's and/or Franco Ribeiro's alleged negligence or alleged misuse of the Car Seat may be imputed to their infant son, Lucas Ribeiro.
19. Whether Defendants' alleged defenses are applicable to the facts in this lawsuit and whether any of the Defendants have waived any of their alleged defenses by, among other things, failing to plead them.
20. Whether any of the Defendants or their agents, employees, or representatives spoliated any evidence with regard to any of the matters alleged in the above-captioned lawsuit, including whether Plaintiffs are entitled to relief, in the form of an instruction to the jury or otherwise, due to spoliation of evidence.

### **LERADO DEFENDANTS' STATEMENT OF ISSUES**

The following are the issues that the Lerado Defendants contend are remaining to be determined and/or are unresolved (Plaintiffs object to the Lerado Defendants' characterization of these alleged issues and the claims that the Lerado Defendants make in the alleged issues):

1. Misuse of the Product
  - a. That Plaintiff Deanna Ribeiro used the product in one or more ways claimed by Defendants;
  - b. That Defendants could not have reasonably foreseen such a use of the product;
  - c. That this misuse was a proximate cause of Lucas Ribeiro's injuries.
2. Misuse

- a. Failure to follow plain and unambiguous instructions is a misuse of the product. Misuse is a failure to exercise due care, from which the Defendant may raise the issue of contributory negligence.
3. State of the Art<sup>1</sup>
    - a. The design, testing, and labeling of the Car Seat conformed with the generally recognized and prevailing state of the art in the industry.
  4. Contract Specification Defense<sup>2</sup>
    - a. Lerado contends it manufactured the subject Car Seat in accordance with the plans and specifications of Mark Sedlack, Millenium Development Corp., and Baby Trend.
    - b. Lerado contends Nebraska has adopted the following rule: a manufacturer is not liable for injuries to a user of a product which it has manufactured in accordance with plans and specifications of one other than the manufacturer, except where the plans are so obviously, patently, or glaringly dangerous that a manufacturer exercising ordinary care under the circumstances then existing would not follow them. *Moon v. Winger Boss Co.*, 205 Neb. 292, 300; 287 N.W.2d 430, 434 (1980).
      - i. Plaintiffs object to the inclusion or any reference to any alleged contractor specification defense in this lawsuit. Plaintiffs dispute that Nebraska has adopted any such alleged contractor specification defense. Plaintiffs also state that the Lerado Defendants did not plead that alleged defense in their Answer to Plaintiffs' Seventh Amended Complaint. (See Filing No. 438.) Plaintiffs object to any attempt by Defendants to litigate this issue at trial. Further, Plaintiffs state that any such alleged defense is not applicable to, or meritorious on, the facts of this case, as Plaintiffs have shown in their Brief in Opposition to the Lerado Defendants' Motion for Summary Judgment. (See Filing No. 605, pp. 71-87.)
  5. Lerado Defendants assert that Plaintiffs were at fault and that their fault was a cause of injuries to Lucas Ribeiro. As such, Neb. Rev. Stat. § 25-21, 185.07-.12 applies to Plaintiffs' claims.
  6. Assumption of the Risk
    - a. Plaintiffs knew of or understand the specific danger;

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<sup>1</sup> Lerado contends it was not the designer of the subject Car Seat, but submits this issue to the extent the Court finds otherwise.

<sup>2</sup> The Lerado Defendants have moved for summary judgment on this issue. See Doc. 568.

- b. Plaintiffs voluntarily exposed Lucas Ribeiro to the danger; and
- c. Lucas Ribeiro's injuries occurred as a result of his exposure to the danger.

**IMMI'S STATEMENT OF ISSUES**

The following are the issues that IMMI contends are remaining to be determined and/or are unresolved (Plaintiffs object to IMMI's characterization of these alleged issues and the claims that IMMI makes in the alleged issues):

1. Whether IMMI had a duty to Plaintiffs as a nondefective component part supplier.
  - a. Whether IMMI had a duty to test the manufacturer's final product;
  - b. Whether component part suppliers can be responsible for accidents that result when its parts are integrated into a larger system the component part supplier did not design or build; and
  - c. Whether the sale of a single component of a system can make IMMI responsible for the overall design of the harness system and/or Car Seat.
2. Whether and to what extent the respective Defendants participated and/or had a duty to participate in the design of the Car Seat, including but not limited to the design of the instructions and warnings for or on the Car Seat.
  - a. Whether IMMI designed the Car Seat.
  - b. Whether IMMI had a duty to design the Car Seat.
  - c. Whether IMMI designed the instructions and/or warnings for or on the Car Seat.
  - d. Whether IMMI had a duty to design the instructions and/or warnings for or on the Car Seat.
3. Whether IMMI's component part proximately caused Plaintiffs' alleged damages.
4. Whether IMMI is not liable because it manufactured its component part in accordance with the specifications of Mark Sedlack.
  - a. Whether IMMI manufactured its component part in accordance with the specifications of Mark Sedlack.
  - b. Whether the specifications of Mark Sedlack for IMMI's component part were so obviously, patently, or glaringly dangerous that IMMI should not follow them.

- i. Plaintiffs object to the inclusion or any reference to any alleged contractor specification defense in this lawsuit. Plaintiffs dispute that Nebraska has adopted any such alleged contractor specification defense. Plaintiffs also state that IMMI did not plead that alleged defense in their Answer to Plaintiffs' Seventh Amended Complaint. (See Filing No. 329.) Plaintiffs object to any attempt by Defendants to litigate this issue at trial. Further, Plaintiffs state that any such alleged defense is not applicable to, or meritorious on, the facts of this case, as Plaintiffs have shown in their Brief in Opposition to the Lerado Defendants' Motion for Summary Judgment. (See Filing No. 605, pp. 71-87.)
5. Whether any affirmation of fact or promise made by Defendant became part of the basis of the bargain.
6. Whether Plaintiffs' implied warranty claims are merged with their strict product liability claims and therefore should not be submitted to the jury.
7. Whether Plaintiffs' Magnuson Moss Act claims fail by virtue of their failure to prove their breach of warranty claims under applicable state law.
8. Whether Plaintiffs' claims were proximately caused by the negligence of Deanna Ribeiro and/or Franco Ribeiro.
9. Whether Plaintiffs' damages, if any, were caused by intervening and/or superseding acts and/or omissions of persons and/or entities for whose conduct IMMI cannot be held liable.
10. Whether Plaintiffs' claims are barred by virtue of their assumption of the risk.
11. Whether Plaintiffs' claims are barred by virtue of their misuse of the product.
12. Whether IMMI's product was in conformity with the generally recognized state-of-the-art in the industry at the time it was first sold.
13. Whether IMMI's product was fit for its intended purposes when it was first sold.
14. Whether IMMI's product did not contain any non-conformities or defects when it was first sold.
15. Whether IMMI's product complied with any limited written express warranties when it was first sold.
16. Whether IMMI's product was defective or unreasonably dangerous when it was first sold.

17. Whether Plaintiffs failed to properly and timely notify IMMI of any alleged defect, condition, non-conformity, or breach of warranty as required by law.
18. Whether Plaintiffs' claims are barred and/or limited by applicable disclaimers of warranty and/or limitation of damages provisions.
19. Whether any act or conduct by IMMI caused any injury, damage, or loss to Plaintiffs.
20. Whether Plaintiffs failed to reasonably mitigate any damages or losses they allegedly sustained.
21. Whether Plaintiffs as parents are permitted under Nebraska law to present claims for loss of parental consortium for the alleged nonfatal injury to a child.
22. Whether, in the event IMMI is found jointly and severally liable with any other defendant, IMMI has a right to contribution and its liability should be reduced by the amount of other parties' percentages of fault as determined by the finder of fact pursuant to Neb. Rev. Stat. Sec. 25-21,185.10.
23. Whether evidence was spoliated by parties or non-parties, and whether Defendants are entitled to relief, in the form of an instruction to the jury or otherwise, due to spoliation of evidence.

#### **LIST OF THE PARTIES' PENDING MOTIONS**

1. The parties' respective motions *in limine*, which were filed on March 24, 2017.
2. The parties' respective Daubert motions and associated request(s) for oral argument, filed on March 24, 2017.
3. IMMI's Motion to Strike and associated request for oral argument, filed on March 24, 2017.
4. IMMI's Motion to Strike Opinions of Ted Sokol (filing no. 770)
5. Other motions and associated request(s) for oral argument to be filed on or after April 17, 2017.

**(D) Witnesses.** Each of the parties' amended witness lists are attached and are incorporated by reference herein. It is understood that, except upon a showing of good cause, no witness whose name does not appear on a parties' witness list shall be permitted to testify over objection for any purpose except impeachment. A witness whose only testimony is intended to establish foundation for an exhibit for which foundation has not been waived shall not be permitted to testify for any other purpose,

over objection, unless such witness has been disclosed pursuant to Federal Rule of Civil Procedure 26(a)(3). A witness appearing on any party's witness list may be called by any other party.

Defendants state that all witnesses expected to be called to testify, except those who may be called for impeachment purposes as defined in NECivR 16.2(c) only, are listed. Defendants object to Plaintiffs calling witnesses listed on Plaintiffs' Witness List by deposition without first satisfying the conditions of Fed. R. Civ. P. 32(a); however, the parties have stipulated that at least these three witnesses are unavailable for trial and may testify by deposition: Suzanne Haney, M.D., Omaha, NE; Chandrika Rizal, M.D., Omaha, NE; and Fernando Zapata, M.D., Omaha, NE. Plaintiffs also reserve their right to object to the calling of any witnesses identified on Defendants' witness lists.

**(E) Expert Witnesses' Qualifications.** Experts who may be called by Plaintiffs and their qualifications are:

Rule 26(a)(2)(B) witnesses:

Kathie Allison, PT, MS, CLCP (see attached qualifications);  
Terry L. Stentz, Ph.D., MPH, CPE (see attached qualifications);  
Kelli R. Herstein, Ph.D. (see attached qualifications);  
Arthur W. Hoffman, Ed.D., P.E. (see attached qualifications);  
Prashant Joshi, M.D. (see attached qualifications);  
John O. Ward, Ph.D. (see attached qualifications);  
Kurt V. Krueger, Ph.D. (see attached qualifications); and  
Ted Sokol, Ph.D. (see attached qualifications).

Rule 26(a)(2)(C) witnesses:

Jill Bell, APRN-NP (treating medical provider);  
Heidi Blum (Hillrise Elementary - Lucas Ribeiro's teacher);  
Jamie Cummings (Safe Kids Platte Valley);  
Debora Goebel, M.D. (treating medical provider);  
Joe Graf (treating medical provider);  
Suzanne Haney, M.D. (treating medical provider);  
Susan L. Hansen, R.N. (treating medical provider);  
Adam T. Kafka, M.D. (treating medical provider);  
Katherine A. Keifer, M.D. (treating medical provider);  
Angela Kratochvil-Stava, M.D. (treating medical provider);  
Gary S. Lerner, M.D. (treating medical provider);  
Jacqueline Liess (Safe Kids Platte Valley);  
Bill Maendela, EMT (treating medical provider);  
Dawn M. Murray, M.D. (treating medical provider);  
Young Oliver, M.D. (treating medical provider);

Ivan Pakvovic, M.D. (treating medical provider);  
Chandrika Rizal, M.D. (treating medical provider);  
Kimberly Roberts (Hillrise Elementary – Lucas Ribeiro’s teacher);  
Mark C. Wilson, M.D. (treating medical provider); and  
Fernando Zapata, M.D. (treating medical provider);

Experts who may be called by Defendants Lerado Group Co., Ltd, Lerado Group (Holding) Company Ltd., Lerado (Zhong Shan) Industrial Co., Ltd., Lerado China Limited, Lerado H.K. Limited, Dorel Industries, Inc., and Maxi Miliaan B.V., and their qualifications are:

Rule 26(a)(2)(B) witnesses:

William W. Van Arsdell, Ph.D., P.E. (see attached qualifications);  
Christine T. Wood, Ph.D. (see attached qualifications); and  
Michael T. Prange, Ph.D., P.E. (see attached qualifications);

Experts who may be called by Defendant Indiana Mills & Manufacturing, Inc., and their qualifications are:

Rule 26(a)(2)(B) witnesses:

James R. Chinni, P.E. (see attached qualifications); and  
William W. Van Arsdell, Ph.D., P.E. (see attached qualifications).

**(F) Voir Dire.** Counsel have reviewed Federal Rule of Civil Procedure 47(a) and NECivR 47.2(a) and suggest the following with regard to the conduct of juror examination:

The parties request that the Court allow the submission of voir dire questions no later than three (3) days prior to the first day of trial (i.e. April 21, 2017) and that the Court conduct a preliminary examination of prospective jurors, with counsel for both parties asking follow-up questions. Any party requesting the use of a juror questionnaire shall prove a copy of the proposed questionnaire to all other parties at least three (3) days prior to the first day of trial.

**(G) Number of Jurors.** Counsel have reviewed Federal Rule of Civil Procedure 48 and NECivR 48.1. Plaintiffs and the Lerado Defendants suggest that this matter be tried to a jury composed of six (6) members with one (1) alternate. IMMI suggests that this matter be tried to a jury composed of twelve (12) members with two (2) alternates.

**(H) Verdict.** The parties will not stipulate to a less-than-unanimous verdict at this time.

**(I) Briefs, Instructions, and Proposed Findings.** Counsel have reviewed NECivR 39.2(a), 51.1(a), and 52.1, and suggest the following schedule for filing trial briefs, proposed jury instructions, and proposed findings of fact, as applicable:

Unless otherwise ordered, trial briefs, proposed jury instructions, and proposed findings of fact and conclusions of law, shall be filed seven (7) days before the first day of trial (i.e. April 17, 2017). Objections to proposed jury instructions shall be filed three (3) days before the first day of trial (i.e. April 21, 2017).

**(J) Length of Trial.** Plaintiffs and the Lerado Defendants estimate that the length of trial will take no more than ten (10) days. IMMI estimates the length of trial will take ten (10) days.

**(K) Trial Date.** Trial is set to begin on Monday, April 24, 2017, at 8:30 A.M., in the Roman L. Hruska Federal Courthouse, Courtroom No. 3, Omaha, Douglas County, Nebraska.

**(L) Deposition and Written Discovery Designations.** The parties have agreed they will exchange their written discovery and deposition designations with each other by April 17, 2017. Plaintiffs propose that they will exchange any written discovery and deposition counter-designations by April 19, 2017. IMMI and the Lerado Defendants propose that the parties exchange counter-designations on April 21, 2017. The parties, however, have agreed to revisit this issue once they exchange their counter-designations on April 17, 2017.

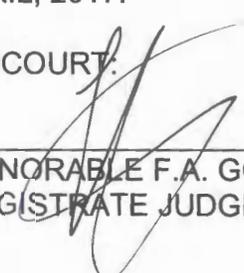
**(M) Demonstratives.** The parties will make any demonstrative exhibit available by 10:00 a.m. the day before the witness with which it will be used is identified to testify [see (N) below]. For example, if a party plans to use a demonstrative exhibit with a witness planned to be called on Wednesday, then that party will make that demonstrative exhibit available by Tuesday at 10:00 a.m.

**(N) Witnesses.** The parties propose that they will attempt to identify witnesses to be called to testify by 5 p.m. two business days before they will testify. For

example, if a party plans to call a witness on Wednesday, then that party will inform counsel of that by Monday at 5 p.m.

SO ORDERED this 17th day of APRIL, 2017.

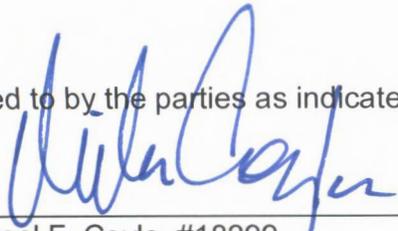
BY THE COURT:

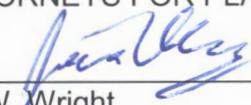


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THE HONORABLE F.A. GOSSETT  
U.S. MAGISTRATE JUDGE

Agreed to by the parties as indicated by the signatures of counsel below.

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INC.

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEBRASKA

FRANCO RIBEIRO and DEANNA RIBEIRO, )  
as individuals and as next friends and )  
biological parents of LUCAS RIBEIRO, an )  
infant, )

Case No. 8:12-cv-00204

Plaintiffs, )

**PLAINTIFFS' AMENDED**  
**EXHIBIT LIST WITH**  
**IMMI'S OBJECTIONS**

vs. )

BABY TREND, INC., et al. )

Defendants. )

COME NOW Plaintiffs, Franco Ribeiro and Deanna Ribeiro, by and through their counsel, and hereby submit the following amended exhibit list, subject to offer:

Trial Date: April 24, 2017

| EXHIBIT NUMBERS |            |      |     | DEP | DESCRIPTION                                  | OFF | OBJ  | RCVD | NOT RCVD | DATE |
|-----------------|------------|------|-----|-----|--|-----|------|------|----------|------|
| PLF             | BT/<br>MDC | IMMI | LER |     |  |     |      |      |          |      |
| 1               |            |      |     | 1   | Notice to Take Depo. (Millennium Develop.)   |     | H, R |      |          |      |
| 2               |            |      |     | 2   | Resume (Mark Sedlack)                        |     | H    |      |          |      |
| 3               |            |      |     | 3   | MDC's Answers to Interrogatories             |     |      |      |          |      |
| 4               |            |      |     | 4   | Patent for Car Seat (Sedlack) (05-09-06)     |     |      |      |          |      |
| 5               |            |      |     | 5   | Patent for Car Seat (Sedlack) (02-28-06)     |     |      |      |          |      |
| 6               |            |      |     | 6   | Patent for Car Seat (Sedlack) (12-27-05)     |     |      |      |          |      |
| 7               |            |      |     | 7   | Patent for Car Seat (Sedlack) (07-12-05)     |     |      |      |          |      |
| 8               |            |      |     | 8   | Patent for Car Seat (Sedlack) (07-05-05)     |     |      |      |          |      |
| 9               |            |      |     | 9   | Patent for Car Seat (Sedlack) (12-28-04)     |     |      |      |          |      |
| 10              |            |      |     | 10  | Patent for Car Seat (Sedlack) (11-02-04)     |     |      |      |          |      |
| 11              |            |      |     | 11  | Photos (Baby Trend car seat)                 |     |      |      |          |      |
| 12              |            |      |     | 12  | Owner's Manual for Flex-Loc Car Seat (01.04) |     | R    |      |          |      |
| 13              |            |      |     | 13  | Owner's Manual for Flex-Loc Car Seat (01.05) |     | R    |      |          |      |

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| 14 |  |  | 14 | Owner's Manual for Flex-Loc Car Seat (01.06)        |  |   |  |  |  |
| 15 |  |  | 15 | Consultant Agreement (05-13-03)                     |  |   |  |  |  |
| 16 |  |  | 16 | Consultant Agreement (03-03-00)                     |  |   |  |  |  |
| 17 |  |  | 17 | Car Seat Project Schedule                           |  |   |  |  |  |
| 18 |  |  | 18 | Car Seat Documents from Mark Sedlack [MDC00741-780] |  |   |  |  |  |
| 19 |  |  | 19 | Photos (alternative harness for car seat)           |  | R   |  |  |  |
| 20 |  |  | 20 | Patent Information (chest clip) [MDC00016-24]       |  |   |  |  |  |
| 21 |  |  | 21 | 11-11-05 Email between Defendants                   |  | H   |  |  |  |
| 22 |  |  | 22 | 09-14-05 Email between Defendants                   |  | H, O (no characterizing foreign language without translation) |  |  |  |
| 23 |  |  | 23 | 10-27-05 Email between Defendants                   |  | H   |  |  |  |
| 24 |  |  | 24 | 10-11-05 Email between Defendants                   |  | H, O (for lang.)  |  |  |  |
| 25 |  |  | 25 | Photo (MGA post-test crash)                         |  |   |  |  |  |
| 26 |  |  | 26 | ASTM F2050-13a                                      |  |   |  |  |  |
| 27 |  |  | 27 | Lerado Car Seat Production Details                  |  |   |  |  |  |
| 28 |  |  | 28 | Patent Drawings (Latch-Loc car seat)                |  |   |  |  |  |
| 29 |  |  | 29 | Photos (crotch buckle)                              |  |   |  |  |  |
| 30 |  |  | 30 | Baby Trend Product Catalog (2006-07)                |  | R (other products)  |  |  |  |
| 31 |  |  | 31 | Instruction Manual (Trendsport Trav.) (06-06)       |  |   |  |  |  |
| 32 |  |  | 32 | Patent Overview (Latch-Loc car seat - travel)       |  |   |  |  |  |
| 33 |  |  | 33 | Product Description (Latch-Loc car seat)            |  |   |  |  |  |
| 34 |  |  | 34 | Revisions to FMVSS 213 (08-01-05)                   |  |   |  |  |  |
| 35 |  |  | 35 | Crash-test Matrix Data (04-12-7)                    |  |   |  |  |  |
| 36 |  |  | 36 | NHTSA Test Report (Flex-Loc 6325) (06-02-06)        |  |   |  |  |  |
| 37 |  |  | 37 | NHTSA Test Report (Flex-Loc 6325) (07-24-06)        |  |   |  |  |  |

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| 38 |  |  | 38 | Photo (European car seat)   | R (other products) |  |  |  |
| 39 |  |  | 39 | Photo (European car seat)   | R (other products) |  |  |  |
| 40 |  |  | 40 | Notice to Take Depo (Baby Trend)  | H, R               |  |  |  |
| 41 |  |  | 41 | Baby Trend Customer Support Log (12-20-11)  |                    |  |  |  |
| 42 |  |  | 42 | News Report (Alpha Group acquisition)   | H                  |  |  |  |
| 43 |  |  | 43 | Lerado Car Seat Production Agreement  |                    |  |  |  |
| 44 |  |  | 44 | Baby Trend's Answers to Rogs  |                    |  |  |  |
| 45 |  |  | 45 | Baby Trend's Answers to Rogs (Supp. #1)   |                    |  |  |  |
| 46 |  |  | 46 | Baby Trend's Answers to Rogs (Supp. #2)   |                    |  |  |  |
| 47 |  |  | 47 | Lerado Organizational Charts  | H, O (for lang.)   |  |  |  |
| 48 |  |  | 48 | 05-09-12 Ltr. from Fraser Stryker   | H, O (for lang.)   |  |  |  |
| 49 |  |  | 49 | Instruction Manual (Trendsport Trav.) (07-05)   |                    |  |  |  |
| 50 |  |  | 50 | Baby Trend's Rule 26(a)(1) Initial Disclosures  |                    |  |  |  |
| 51 |  |  | 51 | Indiana Mills Documents (IMMI.0001-0139)<br>[Plaintiffs will not offer IMMI.0137-0139.] |                    |  |  |  |
| 52 |  |  | 52 | Gnotec Documents  |                    |  |  |  |
| 53 |  |  | 53 | Notice to Take Depo (IMMI)  | H, R               |  |  |  |
| 54 |  |  | 54 | Photos (A-Lok adjuster strap)   |                    |  |  |  |
| 55 |  |  | 55 | Document Retention Policy (IMMI)  | R                  |  |  |  |
| 56 |  |  | 56 | Notice to Take Depo (Deanna Ribeiro)  | H, R               |  |  |  |
| 57 |  |  | 58 | Photos (Baby Trend car seat) (04-06-16)   |                    |  |  |  |
| 58 |  |  | 59 | Photos (taken from accident scene by KPD)   |                    |  |  |  |
| 59 |  |  | 61 | Safe Kids Checklist (Baby Trend car seat)   |                    |  |  |  |
| 60 |  |  | 62 | Google Map (Ribeiro home)   |                    |  |  |  |
| 61 |  |  | 64 | Drawing (Ribeiro home)  |                    |  |  |  |
| 62 |  |  | 65 | Google Map (Ribeiro home)   |                    |  |  |  |

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| 63 |  |  | 66                                       | Google Map (Ribeiro home)                     |  |  |  |  |
| 64 |  |  | 67                                       | Records (Kearney Police Department)           |  | H, O (arg.)<br>(objs. to<br>letters from<br>counsel<br>only) |  |  |
| 65 |  |  | 67C                                      | Police Interview (Deanna Ribeiro)             |  | H  |  |  |
| 66 |  |  | 67D                                      | Police Interview (Franco Ribeiro)             |  | H  |  |  |
| 67 |  |  | 68                                       | Records (Good Samaritan Hospital)             |  | H, O (spec.,<br>702), FD<br>(objs. to<br>parts)              |  |  |
| 68 |  |  | 69                                       | Records (Kearney Clinic, P.C.)                |  | H, O (spec.,<br>702), FD<br>(objs. to<br>parts)              |  |  |
| 69 |  |  | 70                                       | Curriculum Vitae (Dawn Murray, M.D.)          |  | H  |  |  |
| 70 |  |  | 71                                       | Curriculum Vitae (Angela Kratochvil,<br>M.D.) |  | H  |  |  |
| 71 |  |  | 72                                       | Curriculum Vitae (Katherine Keifer, M.D.)     |  | H  |  |  |
| 72 |  |  | 73                                       | Good Samaritan H & P                          |  | H, O (spec.,<br>702), FD<br>(objs. to<br>parts)              |  |  |
| 73 |  |  | 74                                       | Good Samaritan ER record                      |  | H, O (spec.,<br>702), FD<br>(objs. to<br>parts)              |  |  |
| 74 |  |  | 75                                       | Good Samaritan discharge page                 |  | H, O (spec.,<br>702), FD<br>(objs. to<br>parts)              |  |  |
| 75 |  |  | 76                                       | Good Samaritan progress note                  |  | H, O (spec.,<br>702), FD<br>(objs. to<br>parts)              |  |  |
| 76 |  |  | 77,<br><small>p. 24-27<br/>31-38</small> | Records (Safe Kids Platte Valley)             |  | H, R, FD<br>(pp. 31-38)                                      |  |  |
| 77 |  |  | 78                                       | Safe Kids Checklist Form                      |  |  |  |  |
| 78 |  |  | 79                                       | Safe Kids Checklist (Baby Trend car<br>seat)  |  |  |  |  |
| 79 |  |  | 80                                       | Notes (Officer Dowling)                       |  |  |  |  |

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| 80  |  |  | 81  | Photo (accident scene)                          |  |   |  |  |
| 81  |  |  | 82  | Curriculum Vitae (Chandrika Rizal, M.D.)        |  | H   |  |  |
| 82  |  |  | 83  | Medical Records (Chandrika Rizal, M.D.)         |  | H, O (spec.,<br>702), FD<br>(objs. to<br>parts) |  |  |
| 83  |  |  | 84  | Office Visit (Chandrika Rizal, M.D.) (06-21-16) |  | H, O (spec.,<br>702), FD<br>(objs. to<br>parts) |  |  |
| 84  |  |  | 85  | Office Visit (Chandrika Rizal, M.D.) (04-18-16) |  | H, O (spec.,<br>702), FD<br>(objs. to<br>parts) |  |  |
| 85  |  |  | 86  | Medical Bills (Lucas Ribeiro)                   |  | U   |  |  |
| 86  |  |  | 87  | Curriculum Vitae (Suzanne Haney, M.D.)          |  | H   |  |  |
| 87  |  |  | 88  | Medical Records (Children's Hospital / Phys.)   |  | H, O (spec.,<br>702), FD<br>(objs. to<br>parts) |  |  |
| 88  |  |  | 89  | Consult Note (Suzanne Haney) (05-28-11)         |  | H, O (spec.,<br>702), FD<br>(objs. to<br>parts) |  |  |
| 89  |  |  | 90  | Baby Trend Call Logs (Model #6325)              |  | H, R, FD<br>(other<br>incidents)                |  |  |
| 90  |  |  | 91  | Child Restraint Registration Card (redacted)    |  |   |  |  |
| 91  |  |  | 92  | Notice to Take Depo (Lerado)                    |  | H, R  |  |  |
| 92  |  |  | 93  | Plaintiffs' Complaint (7th Amended)             |  | H, O (arg.)                                     |  |  |
| 93  |  |  | 94  | Lerado's Answer to Complaint (7th Amended)      |  | H, O (arg.)                                     |  |  |
| 94  |  |  | 95  | Lerado Company Profile (05-14-06)               |  | H   |  |  |
| 95  |  |  | 96  | Baby Trend Documents                            |  |   |  |  |
| 96  |  |  | 97  | LinkedIn Profile (Roger Hsu)                    |  | H, R  |  |  |
| 97  |  |  | 98  | Lerado Specification Manual                     |  |   |  |  |
| 98  |  |  | 99  | Lerado Invoice (06-05-07)                       |  |   |  |  |
| 99  |  |  | 100 | Lerado Car Seat Issues Spreadsheet              |  | O (for.<br>lang.)                               |  |  |
| 100 |  |  | 102 | Lerado Test Reports (Lerado.0218-0243)          |  | O (for.<br>lang.)                               |  |  |

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| 101 |  |  | 103  | Photos (car seats)                           | R (other products)         |  |  |  |
| 102 |  |  | 104  | Lerado Parts Agreements (March 22, 2007)     | O (for. lang.)             |  |  |  |
| 103 |  |  | 105  | Lerado documents (Lerado.0273-0278)          | O (for. lang.)             |  |  |  |
| 104 |  |  | 106  | Lerado documents (Lerado.0279-0290)          | O (for. lang.)             |  |  |  |
| 105 |  |  | 107  | Lerado Patent List                           | O (for. lang.)             |  |  |  |
| 106 |  |  | 108  | MDC documents                                | O (for. lang.)             |  |  |  |
| 107 |  |  | 109  | Baby Trend Purchase Orders                   |                            |  |  |  |
| 108 |  |  | 110  | Notice to Take Depo (Denny Tsai)             | H, R                       |  |  |  |
| 109 |  |  | 111  | Baby Trend Website (02-23-06)                | H, FD                      |  |  |  |
| 110 |  |  | 112  | Baby Trend Website (02-05-06)                | H, FD                      |  |  |  |
| 111 |  |  | 113  | Baby Trend Website (03-13-06)                | H, FD                      |  |  |  |
| 112 |  |  | 114  | Owner's Manual for Flex-Loc Car Seat (01.04) |                            |  |  |  |
| 113 |  |  | 115  | Baby Trend Website (10-15-07)                | H, FD                      |  |  |  |
| 114 |  |  | 116  | Baby Trend Call Logs                         | H, R, FD (other incidents) |  |  |  |
| 115 |  |  | 117  | Emails between Defendants                    |                            |  |  |  |
| 116 |  |  | 119  | Expert Report (Arthur Hoffmann, P.E.)        | H, O (702)                 |  |  |  |
| 117 |  |  | 121  | Curriculum Vitae (Arthur Hoffmann, P.E.)     | H                          |  |  |  |
| 118 |  |  | 124  | Expert Report (Kathie Allison)               | H                          |  |  |  |
| 119 |  |  | 125  | Curriculum Vitae (Kathie Allison)            | H                          |  |  |  |
| 120 |  |  | 126  | Expert Report (Prashant Joshi, M.D.)         | H                          |  |  |  |
| 121 |  |  | 130  | Curriculum Vitae (Kathie Allison)            | H                          |  |  |  |
| 122 |  |  | 131  | Expert Report (revised) (Kathie Allison)     | H, O (late)                |  |  |  |
| 123 |  |  | 135  | Expert Report (John Ward, Ph.D.)             | H                          |  |  |  |
| 124 |  |  | 137  | Summary of Economic Loss (Lucas Ribeiro)     | H                          |  |  |  |
| 125 |  |  | 138  | Educational Attainment (females)             | H, O (late)                |  |  |  |
| 126 |  |  | 138A | Educational Attainment (males)               | H, O (late)                |  |  |  |
| 127 |  |  | 140  | Expert Report (Kathie Allison)               | H                          |  |  |  |
| 128 |  |  | 143  | Curriculum Vitae (Fernando Zapata, M.D.)     | H                          |  |  |  |

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| 129 |  |  | 144                                | Medical Records  | H, O (spec., 702), FD (objs. to parts) |  |  |  |
| 130 |  |  | 145                                | Medical Records (CDC Clinic)<br>[CDC.CLINIC.0244-0249] | H, O (spec., 702), FD (objs. to parts) |  |  |  |
| 131 |  |  | 146                                | Progress Note (08-11-2012)                             | H, O (spec., 702), FD (objs. to parts) |  |  |  |
| 132 |  |  | 148                                | Expert Report (Terry Stentz / Kelli Herstein)          | H                                      |  |  |  |
| 133 |  |  | 150                                | Curriculum Vitae (Terry Stentz, Ph.D.)                 | H                                      |  |  |  |
| 134 |  |  | 151                                | Expert File (Terry Stentz, Ph.D.)                      |  |  |  |  |
| 135 |  |  | 151A                               | Registration Card (Kassidy Hurlbutt)                   |  |  |  |  |
| 136 |  |  | 151B                               | Photos (Baby Trend car seat)                           |  |  |  |  |
| 137 |  |  | 151D                               | Additional Info. (Kelli Herstein, Ph.D.)               |  |  |  |  |
| 138 |  |  | 154                                | Expert Rebuttal Report (Kelli Herstein, Ph.D.)         | H, O (late)                            |  |  |  |
| 139 |  |  | 175                                | Notice to Take Depo (William Van Arsdell)              | H, R                                   |  |  |  |
| 140 |  |  | 176                                | Response to Depo. Notice (Van Arsdell)                 | H                                      |  |  |  |
| 141 |  |  | 178,<br><small>p 2849-2857</small> | Invoices (Van Arsdell)                                 | R                                      |  |  |  |
| 142 |  |  | 185                                | Notice to Take Depo (James Chinni)                     | H, R                                   |  |  |  |
| 143 |  |  | 187                                | Invoices (James Chinni)                                | R                                      |  |  |  |
| 144 |  |  | 188                                | Photos (Baby Trend Car Seat)                           |  |  |  |  |
| 145 |  |  | 189                                | Inspection Report (Julia King)                         |  |  |  |  |
| 146 |  |  | 190                                | Product Description Sheet (A38042A)                    |  |  |  |  |
| 147 |  |  | 191                                | Product Description Sheet (F14193)                     |  |  |  |  |
| 148 |  |  | 192                                | Invoices (Michael Prange)                              | R                                      |  |  |  |
| 149 |  |  | 193                                | Photos (Baby Trend car seat)                           |  |  |  |  |
| 150 |  |  | 194                                | Photos (two babies)                                    |  |  |  |  |
| 151 |  |  | 196                                | CAMI 6-Month Old Dummy Information                     |  |  |  |  |
| 152 |  |  | 197                                | Photos (CAMI Dummy)                                    |  |  |  |  |
| 153 |  |  | 200                                | Expert Report (Ted Sokol, P.E.)                        | H, O (late)                            |  |  |  |
| 154 |  |  | 201                                | Expert File (Ted Sokol, P.E.)                          |  |  |  |  |

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| 155 |  |  | 1 | Lerado Car Seat Production Agreement<br>(Depo of Baby Trend, 06-23-2015)                  |  |      |  |  |  |
| 156 |  |  | 2 | Baby Trend's Answers to Interrogatories<br>(Depo of Baby Trend, 06-23-2015)               |  |      |  |  |  |
| 157 |  |  | 5 | Communications on OPP Car Seat<br>(Depo of Baby Trend, 06-23-2015)                        |  |      |  |  |  |
| 158 |  |  | 6 | Communications with Lerado<br>(Depo of Baby Trend, 06-23-2015)                            |  |      |  |  |  |
| 159 |  |  | 7 | Communications with Lerado<br>(Depo of Baby Trend, 06-23-2015)                            |  |      |  |  |  |
| 160 |  |  | 8 | Communications with Lerado<br>(Depo of Baby Trend, 06-23-2015)                            |  |      |  |  |  |
| 161 |  |  | 1 | Corporate Structure (Kendrion)<br>(Depo of Gnotec, 06-24-2015)                            |  | R    |  |  |  |
| 162 |  |  | 2 | Invoices (Kendrion)<br>(Depo of Gnotec, 06-24-2015)                                       |  |      |  |  |  |
| 163 |  |  | 3 | Spreadsheet (buckle information)<br>(Depo of Gnotec, 06-24-2015)                          |  |      |  |  |  |
| 164 |  |  | 4 | Corporate Structure (Kendrion / Gnotec)<br>(Depo of Gnotec, 06-24-2015)                   |  | R    |  |  |  |
| 165 |  |  | 1 | Notice to Take Depo (Lerado Zhong Shan)<br>(Depo of Lerado Zhong Shan, 08-19-2015)        |  | H, R |  |  |  |
| 166 |  |  | 2 | Lerado Car Seat Production Agreement<br>(Depo of Lerado Zhong Shan, 08-19-2015)           |  |      |  |  |  |
| 167 |  |  | 4 | Invoice (Kendrion)<br>(Depo of Lerado Zhong Shan, 08-19-2015)                             |  |      |  |  |  |
| 168 |  |  | 1 | Notice to Take Depo (Lerado Group Holding)<br>(Depo of Lerado Group Holding, 11-11-2015)  |  | H, R |  |  |  |
| 169 |  |  | 2 | Notice to Take Depo (Lerado China Limited)<br>(Depo of Lerado Group Holding, 11-11-2015)  |  | H, R |  |  |  |
| 170 |  |  | 3 | Notice to Take Depo (Lerado Group Co. Ltd.)<br>(Depo of Lerado Group Holding, 11-11-2015) |  | H, R |  |  |  |
| 171 |  |  | 4 | Notice to Take Depo (Lerado H.K. Limited)<br>(Depo of Lerado Group Holding, 11-11-2015)   |  | H, R |  |  |  |
| 172 |  |  | 5 | Lerado Car Seat Production Agreement  |  |      |  |  |  |

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|     |  |  |    |  | (Depo of Lerado Group Holding, 11-11-2015) |       |  |  |  |
| 173 |  |  | 6  | Lerado Organizational Chart<br>(Depo of Lerado Group Holding, 11-11-2015)                    |  | R     |  |  |  |
| 174 |  |  | 7  | Meeting Minutes (Lerado China Limited)<br>(Depo of Lerado Group Holding, 11-11-2015)         |  | R     |  |  |  |
| 175 |  |  | 8  | Lerado Group Holding Annual Report<br>(2006)<br>(Depo of Lerado Group Holding, 11-11-2015)   |  | R     |  |  |  |
| 176 |  |  | 12 | Stock Certificate (Lerado Group Limited)<br>(Depo of Lerado Group Holding, 11-11-2015)       |  | R     |  |  |  |
| 177 |  |  | 13 | Delaware SOS Listing (Lerado Success,<br>Inc.)<br>(Depo of Lerado Group Holding, 11-11-2015) |  | R     |  |  |  |
| 178 |  |  | 14 | Pennsylvania SOS Listing (Lerado<br>Success)<br>(Depo of Lerado Group Holding, 11-11-2015)   |  | R     |  |  |  |
| 179 |  |  | 15 | Stock Certificate (Mia Moda Inc.)<br>(Depo of Lerado Group Holding, 11-11-2015)              |  | R, FD |  |  |  |
| 180 |  |  | 16 | Pennsylvania SOS Listing (Mia Moda<br>Inc.)<br>(Depo of Lerado Group Holding, 11-11-2015)    |  | R     |  |  |  |
| 181 |  |  | 17 | South Carolina SOS Listing (Mia Moda<br>Inc.)<br>(Depo of Lerado Group Holding, 11-11-2015)  |  | R     |  |  |  |
| 182 |  |  | 18 | 10-31-07 Ltr. from Mia Moda Inc. to<br>NHTSA<br>(Depo of Lerado Group Holding, 11-11-2015)   |  | R, FD |  |  |  |
| 183 |  |  | 19 | NHTSA Consumer Advisory (Lerado<br>recall)<br>(Depo of Lerado Group Holding, 11-11-2015)     |  | R     |  |  |  |
| 184 |  |  | 20 | Lerado document (chest clip)<br>(Depo of Lerado Group Holding, 11-11-2015)                   |  |       |  |  |  |
| 185 |  |  | 22 | Lerado Group Holdings Customer List<br>(Depo of Lerado Group Holding, 11-11-2015)            |  | R     |  |  |  |
| 186 |  |  | 23 | Invoice (Kendrion)<br>(Depo of Lerado Group Holding, 11-11-2015)                             |  |       |  |  |  |
| 187 |  |  | 26 | NHTSA Recall Information (Lerado<br>recall)<br>(Depo of Lerado Group Holding, 11-11-2015)    |  | R     |  |  |  |
| 188 |  |  | 28 | Invoices (Kendrion)  |  |       |  |  |  |

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|     |  |  |     | (Depo of Lerado Group Holding, 11-11-2015)  |  |                              |  |  |
| 189 |  |  |     | Photos (KPD - accident scene)<br>[KPD.0001-0263]  |  |                              |  |  |
| 190 |  |  |     | Photos (KPD - at station)<br>[PHOTOS.020-050]   |  |                              |  |  |
| 191 |  |  |     | Police Interview (Deanna Ribeiro) - audio   |  | H                            |  |  |
| 192 |  |  |     | Police Interview (Deanna Ribeiro) - transcript  |  | H                            |  |  |
| 193 |  |  |     | Photos (Baby Trend car seat)<br>[RIBEIRO.0321-0432]   |  |                              |  |  |
| 194 |  |  |     | Photos (Arthur Hoffmann, P.E.)  |  | O (late)                     |  |  |
| 195 |  |  |     | Photos (Terry Stentz / Kelli Herstein)  |  | O (late)                     |  |  |
| 196 |  |  |     | Photos (Ted Sokol, P.E.)  |  |                              |  |  |
| 197 |  |  |     | Photos (Car Seat Inspection)<br>(04/06/2016)<br>[Ribeiro.EP0001-0332]                       |  |                              |  |  |
| 198 |  |  |     | Photos (Car Seat Inspection)<br>(01/18/2017)<br>[Ribeiro.EP0333-0739]                       |  |                              |  |  |
| 199 |  |  |     | Photos (Car Seat Inspection)<br>(01/18/2017)<br>[RibeiroInspection.001-153] (Prange photos) |  |                              |  |  |
| 200 |  |  |     | Video (Car Seat Inspection) (04/06/2016)  |  | H (obj. to audio commentary) |  |  |
| 201 |  |  |     | Video (Car Seat Inspection) (01/18/2017)  |  | H (obj. to audio commentary) |  |  |
| 202 |  |  |     | Photos (Alex and Lucas Ribeiro)<br>[Ribeiro.0433-0452]                                      |  | R (sibling)                  |  |  |
| 203 |  |  |     | Photos (Lucas Ribeiro)<br>[PHOTOS.001-019]  |  |                              |  |  |
| 204 |  |  |     | Photos (Lucas Ribeiro)<br>[RIBEIRO.0001-0318]   |  |                              |  |  |
| 205 |  |  |     | Photos (Ribeiro family)   |  | U                            |  |  |
| 206 |  |  | 133 | Photos (taken by Kathie Allison)<br>[Depo. Ex. 133, pp. 3-10, 58]                           |  |                              |  |  |
| 207 |  |  |     | Photos (Medical Supplies)   |  |                              |  |  |

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|     |  |  |  | [RIBEIRO.0453-0462]  |  |                           |  |  |  |
| 208 |  |  |  | Video (Day in Life of Lucas)   |  | H                         |  |  |  |
| 209 |  |  |  | Baby Trend Website (CRS products) (03-13-06)                                 |  | H, R (other products)     |  |  |  |
| 210 |  |  |  | Baby Trend Website (strollers) (03-13-06)                                    |  | H, R (other products)     |  |  |  |
| 211 |  |  |  | Affidavit (Brad Mattarocci)<br>[Filing No. 475-13]                           |  |                           |  |  |  |
| 212 |  |  |  | Affidavit (Chip Whalen)<br>[Filing No. 475-14]                               |  |                           |  |  |  |
| 213 |  |  |  | Affidavit (Denny Tsai)<br>[Filing No. 475-15]                                |  |                           |  |  |  |
| 214 |  |  |  | Baby Trend Car Seat involved in accident                                     |  | O<br>(demonstrative only) |  |  |  |
| 215 |  |  |  | Lerado Test Reports (Lerado.0244-0263)                                       |  |                           |  |  |  |
| 216 |  |  |  | Photos (MGA sled tests)<br>[BT.DocProd.11001-11006]                          |  |                           |  |  |  |
| 217 |  |  |  | Photos (MGA sled tests)<br>[BT.DocProd.12948-12955]                          |  |                           |  |  |  |
| 218 |  |  |  | Registration Card (unredacted)   |  |                           |  |  |  |
| 219 |  |  |  | 10-23-02 Ltr. from Chip Whalen<br>[BT.MDC.File.388]                          |  |                           |  |  |  |
| 220 |  |  |  | 06-05-06 Ltr. from Mark Sedlack<br>[BT.MDC.File.390]                         |  |                           |  |  |  |
| 221 |  |  |  | MDC Consultant Agreement Summary<br>[BT.MDC.File.369]                        |  |                           |  |  |  |
| 222 |  |  |  | Royalty Agreement (Baby Trend / MDC)<br>[BT.MDC.File.53]                     |  |                           |  |  |  |
| 223 |  |  |  | Royalty Agreement Settlement (BT / MDC)<br>[BT.MDC.File.54]                  |  |                           |  |  |  |
| 224 |  |  |  | Royalty Payments (MDC)<br>[BT.MDC.File. -- various Bates stamps]             |  |                           |  |  |  |
| 225 |  |  |  | Royalty Payments Spreadsheet (MDC)<br>[BT.MDC.File. -- various Bates stamps] |  |                           |  |  |  |
| 226 |  |  |  | Lerado Car Seat Production Details (#2)<br>[BT.MDC.File.443-457]             |  |                           |  |  |  |
| 227 |  |  |  | Baby Trend Production Summary (2002-2007)                                    |  |                           |  |  |  |

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|     |  |  |  | [BT.MDC.File.394-95]  |  |   |  |  |  |
| 228 |  |  |  | Medical Records (American Med Response)<br>[AMR.001-021]                  |  | H, O (spec., 702), FD<br>(objs. to parts) |  |  |  |
| 229 |  |  |  | Medical Records (Apria Healthcare, Inc.)<br>[APRIA.001-075]               |  | H, O (spec., 702), FD<br>(objs. to parts) |  |  |  |
| 230 |  |  |  | Medical Records (Children's Develop. Clinic)<br>[CDC.CLINIC.001-249]      |  | H, O (spec., 702), FD<br>(objs. to parts) |  |  |  |
| 231 |  |  |  | Medical Records (Children's Home Health)<br>[CHILDRENSHOMEHEALTH.001-196] |  | H, O (spec., 702), FD<br>(objs. to parts) |  |  |  |
| 232 |  |  |  | Medical Records (Children's Hospital)<br>[CMH.0001-0925]                  |  | H, O (spec., 702), FD<br>(objs. to parts) |  |  |  |
| 233 |  |  |  | Medical Records (Children's Physicians)<br>[RIZAL.001-125]                |  | H, O (spec., 702), FD<br>(objs. to parts) |  |  |  |
| 234 |  |  |  | Medical Records (Children's Specialty Phys.)<br>[CSP.0001-0053]           |  | H, O (spec., 702), FD<br>(objs. to parts) |  |  |  |
| 235 |  |  |  | Medical Records (Craig Home Care)<br>[CRAIG.001-414]                      |  | H, O (spec., 702), FD<br>(objs. to parts) |  |  |  |
| 236 |  |  |  | Medical Records (ENT Specialists, P.C.)<br>[ENT.001-083]                  |  | H, O (spec., 702), FD<br>(objs. to parts) |  |  |  |
| 237 |  |  |  | Medical Records (Family Physical Therapy)<br>[FPT.00001-00395]            |  | H, O (spec., 702), FD<br>(objs. to parts) |  |  |  |
| 238 |  |  |  | Medical Records (Good Samaritan Hospital)<br>[GSH.0001-0090]              |  | H, O (spec., 702), FD<br>(objs. to parts) |  |  |  |

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| 239 |  |  |  | Medical Records (Great Plains Radiology)<br>[GPR.001-009]          | H, O (spec., 702), FD<br>(objs. to parts) |  |  |  |
| 240 |  |  |  | Medical Records (Hangar Clinic)<br>[HANGER.001-013]                | H, O (spec., 702), FD<br>(objs. to parts) |  |  |  |
| 241 |  |  |  | Medical Records (Kearney Clinic, P.C.)<br>[KC.0001-0209]           | H, O (spec., 702), FD<br>(objs. to parts) |  |  |  |
| 242 |  |  |  | Medical Records (Kids On the Move)<br>[KIDSONTHE MOVE.001-045]     | H, O (spec., 702), FD<br>(objs. to parts) |  |  |  |
| 243 |  |  |  | Medical Records (Madonna Rehab Hospital)<br>[Madonna.0001-0061]    | H, O (spec., 702), FD<br>(objs. to parts) |  |  |  |
| 244 |  |  |  | Medical Records (Maxim Healthcare)<br>[MAXIM.0001-1271]            | H, O (spec., 702), FD<br>(objs. to parts) |  |  |  |
| 245 |  |  |  | Medical Records (NPPI Anesthesiology)<br>[NPPI.001-052]            | H, O (spec., 702), FD<br>(objs. to parts) |  |  |  |
| 246 |  |  |  | Medical Records (Orthomedics Omaha)<br>[ORTHOMEDICS.001-010]       | H, O (spec., 702), FD<br>(objs. to parts) |  |  |  |
| 247 |  |  |  | Medical Records (Rehabilitation Specialists)<br>[REHAB.SP.001-022] | H, O (spec., 702), FD<br>(objs. to parts) |  |  |  |
| 248 |  |  |  | Medical Records (Total Respiratory & Rehab)<br>[TRR.001-091]       | H, O (spec., 702), FD<br>(objs. to parts) |  |  |  |
| 249 |  |  |  | Medical Records (Lucas Ribeiro)                                    | H, O (spec., 702), FD<br>(objs. to parts) |  |  |  |
| 250 |  |  |  | Medical Bills<br>[MEDICAL.BILLS.0001-1269]                         |   |  |  |  |

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| 251 |  |  |  | Medical Bills (Children's Home Health)<br>[Children's Home Healthcare Bill for March 2007<br>001-002] |  |   |  |  |
| 252 |  |  |  | Medical Bills (Lucas Ribeiro)   |  | U   |  |  |
| 253 |  |  |  | Summary of Medical Bills  |  |   |  |  |
| 254 |  |  |  | Mortality / Life Tables   |  | U   |  |  |
| 255 |  |  |  | Records (Elkhorn Public Schools)<br>[ELKHORN.PUBLIC.SCHOOLS.001-038]                                  |  | H, O (spec.,<br>702), FD<br>(objs. to<br>parts) |  |  |
| 256 |  |  |  | Records (Kearney Public Schools)<br>[KEARNEY PUBLIC SCHOOLS 001-054]                                  |  | H, O (spec.,<br>702), FD<br>(objs. to<br>parts) |  |  |
| 257 |  |  |  | Records (Millard Public Schools)<br>[MILLARD.PUBLIC.SCHOOLS.001-027]                                  |  | H, O (spec.,<br>702), FD<br>(objs. to<br>parts) |  |  |
| 258 |  |  |  | Records (Munroe Meyer Institute)<br>[MUNROE MEYER 001-020]  |  | H, O (spec.,<br>702), FD<br>(objs. to<br>parts) |  |  |
| 259 |  |  |  | Records (Omaha Public Schools)<br>[OMAHA.PUBLIC.SCHOOLS.001-406]                                      |  | H, O (spec.,<br>702), FD<br>(objs. to<br>parts) |  |  |
| 260 |  |  |  | Kearney Hub newspaper article   |  | H, R  |  |  |
| 261 |  |  |  | U.S. CPSC Report: "Nursery Product-<br>Related Injuries and Deaths" (Nov. 2010)                       |  | H, R, FD<br>(other<br>incidents)                |  |  |
| 262 |  |  |  | U.S. CPSC Report: "Hand-Held Infant<br>Carriers" (11-07-2012)   |  | H, R, FD<br>(other<br>incidents)                |  |  |
| 263 |  |  |  | U.S. CPSC Report: "Draft Final Rule for<br>Hand-Held Infant Carriers" (10-30-2013)                    |  | H, R, FD<br>(other<br>incidents)                |  |  |
| 264 |  |  |  | Rule 1006 Summaries   |  | U   |  |  |
| 265 |  |  |  | Curriculum Vitae (Arthur Hoffmann, P.E.)  |  | H   |  |  |
| 266 |  |  |  | Expert Report (Arthur Hoffmann, P.E.)   |  | H, O (702)                                      |  |  |
| 267 |  |  |  | Expert Rebuttal Report (Art Hoffmann,<br>P.E.)  |  | H, O (late,<br>improper<br>rebuttal,<br>702)    |  |  |

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| 268 |  |  |  | Curriculum Vitae (Terry Stentz, Ph.D.)         | H                                   |  |  |  |
| 269 |  |  |  | Expert Report (Stentz and Herstein, Ph.D.)     | H, O (702)                          |  |  |  |
| 270 |  |  |  | Expert Rebuttal Report (Terry Stentz, Ph.D.)   | H, O (late, improper rebuttal, 702) |  |  |  |
| 271 |  |  |  | Curriculum Vitae (Kelli Herstein, Ph.D.)       | H                                   |  |  |  |
| 272 |  |  |  | Expert Rebuttal Report (Kelli Herstein, Ph.D.) | H, O (late, improper rebuttal, 702) |  |  |  |
| 273 |  |  |  | Curriculum Vitae (Ted Sokol, P.E.)             | H                                   |  |  |  |
| 274 |  |  |  | Expert Rebuttal Report (Ted Sokol, P.E.)       | H, O (improper rebuttal)            |  |  |  |
| 275 |  |  |  | Curriculum Vitae (Prashant Joshi, M.D.)        | H                                   |  |  |  |
| 276 |  |  |  | Expert Report (Prashant Joshi, M.D.)           | H                                   |  |  |  |
| 277 |  |  |  | Expert Rebuttal Report (Prashant Joshi, M.D.)  | H, O (late, improper rebuttal)      |  |  |  |
| 278 |  |  |  | Curriculum Vitae (Kathie Allison)              | H                                   |  |  |  |
| 279 |  |  |  | Expert Report (Kathie Allison)                 | H                                   |  |  |  |
| 280 |  |  |  | Expert Rebuttal Report (Kathie Allison)        | H, O (late, improper rebuttal)      |  |  |  |
| 281 |  |  |  | Life Care Plan (revised) (Kathie Allison)      | H, O (late)                         |  |  |  |
| 282 |  |  |  | Curriculum Vitae (John Ward, Ph.D.)            | H                                   |  |  |  |
| 283 |  |  |  | Expert Report (John Ward, Ph.D.)               | H                                   |  |  |  |
| 284 |  |  |  | Expert Rebuttal Report (John Ward, Ph.D.)      | H, O (late, improper rebuttal)      |  |  |  |
| 285 |  |  |  | Depo Transcript/Video (Baby Trend) (2015)      |                                     |  |  |  |
| 286 |  |  |  | Depo Transcript/Video (Baby Trend) (2016)      |                                     |  |  |  |
| 287 |  |  |  | Depo Transcript/Video (Chip Whalen)            |                                     |  |  |  |
| 288 |  |  |  | Depo Transcript/Video (Denny Tsai)             |                                     |  |  |  |
| 289 |  |  |  | Depo Transcript/Video (Betty Tsai)             |                                     |  |  |  |
| 290 |  |  |  | Depo Transcript/Video (MDC)                    |                                     |  |  |  |

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| 291 |  |  |  | Depo Transcript/Video (IMMI)                |  |   |  |  |  |
| 292 |  |  |  | Depo Transcript/Video (Lerado Zhong Shan)   |  |   |  |  |  |
| 293 |  |  |  | Depo Transcript/Video (Lerado Group Hldg.)  |  |   |  |  |  |
| 294 |  |  |  | Depo Transcript/Video (Lerado Defs.) (2016) |  |   |  |  |  |
| 295 |  |  |  | Depo Transcript/Video (Gnotec)              |  |   |  |  |  |
| 296 |  |  |  | Depo Transcript/Video (Deanna Ribeiro) (#1) |  | H |  |  |  |
| 297 |  |  |  | Depo Transcript/Video (Deanna Ribeiro) (#2) |  | H |  |  |  |
| 298 |  |  |  | Depo Transcript/Video (Franco Ribeiro)      |  | H |  |  |  |
| 299 |  |  |  | Depo Transcript/Video (Melody Gough)        |  |   |  |  |  |
| 300 |  |  |  | Depo Transcript/Video (Elias Abdallah)      |  |   |  |  |  |
| 301 |  |  |  | Depo Transcript/Video (Tara Abdallah)       |  |   |  |  |  |
| 302 |  |  |  | Depo Transcript/Video (Karen Lewandowski)   |  |   |  |  |  |
| 303 |  |  |  | Depo Transcript/Video (Michael Lewandowski) |  |   |  |  |  |
| 304 |  |  |  | Depo Transcript/Video (David Sesna)         |  |   |  |  |  |
| 305 |  |  |  | Depo Transcript/Video (Michael Young)       |  |   |  |  |  |
| 306 |  |  |  | Depo Transcript/Video (Joshua Salter)       |  |   |  |  |  |
| 307 |  |  |  | Depo Transcript/Video (Dennis Hill)         |  |   |  |  |  |
| 308 |  |  |  | Depo Transcript/Video (Jeff Dowling)        |  |   |  |  |  |
| 309 |  |  |  | Depo Transcript/Video (Betty Lewis)         |  |   |  |  |  |
| 310 |  |  |  | Depo Transcript/Video (Christopher Jamin)   |  |   |  |  |  |
| 311 |  |  |  | Depo Transcript/Video (Joseph Graf)         |  |   |  |  |  |
| 312 |  |  |  | Depo Transcript/Video (Bill Maendele)       |  |   |  |  |  |
| 313 |  |  |  | Depo Transcript/Video (Jamie Cummings)      |  |   |  |  |  |
| 314 |  |  |  | Depo Transcript/Video (Jaqueline Liess)     |  |   |  |  |  |
| 315 |  |  |  | Depo Transcript/Video (Karen Triplett)      |  |   |  |  |  |
| 316 |  |  |  | Depo Transcript/Video (Art Hoffmann, P.E.)  |  | H |  |  |  |

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| 317 |  |  |  | Depo Transcript/Video (Terry Stentz, Ph.D.)   | H        |  |  |  |
| 318 |  |  |  | Depo Transcript/Video (Kelli Herstein, Ph.D.)   | H        |  |  |  |
| 319 |  |  |  | Depo Transcript/Video (Ted Sokol, P.E.)   | H        |  |  |  |
| 320 |  |  |  | Depo Transcript/Video (Dawn Murray, M.D.)   |          |  |  |  |
| 321 |  |  |  | Depo Transcript/Video (Angela Kratochvil, M.D.)                                       |          |  |  |  |
| 322 |  |  |  | Depo Transcript/Video (Katherine Keifer, M.D.)  |          |  |  |  |
| 323 |  |  |  | Depo Transcript/Video (Suzanne Haney, M.D.)   |          |  |  |  |
| 324 |  |  |  | Depo Transcript/Video (Chandrika Rizal, M.D.)   |          |  |  |  |
| 325 |  |  |  | Depo Transcript/Video (Fernando Zapata, M.D.)   |          |  |  |  |
| 326 |  |  |  | Depo Transcript/Video (Prashant Joshi, M.D.)  | H        |  |  |  |
| 327 |  |  |  | Depo Transcript/Video (Kathie Allison)  | H        |  |  |  |
| 328 |  |  |  | Depo Transcript/Video (John Ward, Ph.D.)  | H        |  |  |  |
| 329 |  |  |  | Depo Transcript/Video (William Van Arsdell)   | H        |  |  |  |
| 330 |  |  |  | Depo Transcript/Video (James Chinni)  | H        |  |  |  |
| 331 |  |  |  | Depo Transcript/Video (Michael Prange)  | H        |  |  |  |
| 332 |  |  |  | Materials considered by Art Hoffmann, P.E., in conjunction with his expert reports    | U, H, FD |  |  |  |
| 333 |  |  |  | Materials considered by Terry Stentz, Ph.D., in conjunction with his expert reports   | U, H, FD |  |  |  |
| 334 |  |  |  | Materials considered by Kelli Herstein, Ph.D., in conjunction with her expert reports | U, H, FD |  |  |  |
| 335 |  |  |  | Materials considered by Ted Sokol, P.E., in conjunction with his expert report        | U, H, FD |  |  |  |

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| 336 |  |  |  | Materials considered by Prashant Joshi, M.D., in conjunction with his expert reports   | U, H, FD      |  |  |  |
| 337 |  |  |  | Materials considered by Kathie Allison in conjunction with her expert reports          | U, H, FD      |  |  |  |
| 338 |  |  |  | Materials considered by John Ward, Ph.D., in conjunction with his expert reports       | U, H, FD      |  |  |  |
| 339 |  |  |  | Lerado's Rule 26(a)(1) Disclosures   | H             |  |  |  |
| 340 |  |  |  | Lerado's Rule 26(a)(1) Disclosures (Supp. #1)  | H             |  |  |  |
| 341 |  |  |  | Lerado's Rule 26(a)(1) Disclosures (Supp. #2)  | H             |  |  |  |
| 342 |  |  |  | Lerado's Answers to Interrogatories  | H             |  |  |  |
| 343 |  |  |  | Lerado's Response to RFPD  | H             |  |  |  |
| 344 |  |  |  | Lerado's Response to RFPD (Supp. #1)   | H             |  |  |  |
| 345 |  |  |  | Lerado's Response to RFPD (Supp. #2)   | H             |  |  |  |
| 346 |  |  |  | Lerado Documents<br>[Lerado.0001-0396]   | O (for lang.) |  |  |  |
| 347 |  |  |  | Other exhibits necessary to refute or support anything else that comes up in discovery | U             |  |  |  |
| 348 |  |  |  | Baby Trend exemplar car seats / components   | U             |  |  |  |
| 349 |  |  |  | Exemplar car seats / components  | U             |  |  |  |
| 350 |  |  |  | CAMI Dummy   | U             |  |  |  |
| 351 |  |  |  | Videos (Infants Self-Rocking in Car Seats)   | U             |  |  |  |
| 352 |  |  |  | Videos (Infants in Bouncers)   | U, R          |  |  |  |
| 353 |  |  |  | Demonstrative exhibits for Art Hoffmann, P.E.  | U             |  |  |  |
| 354 |  |  |  | Demonstrative exhibits for Terry Stentz, Ph.D.   | U             |  |  |  |
| 355 |  |  |  | Demonstrative exhibits for Kelli Herstein, Ph.D.                                       | U             |  |  |  |
| 356 |  |  |  | Demonstrative exhibits for Ted Sokol, P.E.   | U             |  |  |  |

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| 357 |  |  |  | Demonstrative exhibits for Prashant Joshi, M.D.    | U |  |  |  |
| 358 |  |  |  | Demonstrative exhibits for Kathie Allison          | U |  |  |  |
| 359 |  |  |  | Demonstrative exhibits for John Ward, Ph.D.        | U |  |  |  |
| 360 |  |  |  | Radiology Imaging of Lucas                         | U |  |  |  |
| 361 |  |  |  | Demonstrative exhibits (human body)                | U |  |  |  |
| 362 |  |  |  | Demonstrative exhibits (past med procedures)       | U |  |  |  |
| 363 |  |  |  | Demonstrative exhibits (Lucas' injuries/illnesses) | U |  |  |  |
| 364 |  |  |  | Demonstrative exhibits (med. equip / supplies)     | U |  |  |  |
| 365 |  |  |  | Demonstrative exhibit (medications)                | U |  |  |  |
| 366 |  |  |  | Demonstrative exhibit (oxygen tank)                | U |  |  |  |
| 367 |  |  |  | Demonstrative exhibit (nebulizer)                  | U |  |  |  |
| 367 |  |  |  | Demonstrative exhibit (suction and supplies)       | U |  |  |  |
| 368 |  |  |  | Demonstrative exhibit (trach care)                 | U |  |  |  |
| 369 |  |  |  | Demonstrative exhibit (trach oxygen trap)          | U |  |  |  |
| 370 |  |  |  | Demonstrative exhibit (formula)                    | U |  |  |  |
| 371 |  |  |  | Demonstrative exhibit (feeding tube)               | U |  |  |  |
| 372 |  |  |  | Demonstrative exhibit (feeding pump)               | U |  |  |  |
| 373 |  |  |  | Demonstrative exhibit (feeding supplies)           | U |  |  |  |
| 374 |  |  |  | Demonstrative exhibit (diapers)                    | U |  |  |  |
| 375 |  |  |  | Demonstrative exhibit (leg bag)                    | U |  |  |  |
| 376 |  |  |  | Demonstrative exhibit (hand splints)               | U |  |  |  |
| 377 |  |  |  | Demonstrative exhibit (ankle foot orthoses)        | U |  |  |  |
| 378 |  |  |  | Demonstrative exhibit (GJ button)                  | U |  |  |  |
| 379 |  |  |  | Demonstrative exhibit (wheelchair)                 | U |  |  |  |
| 380 |  |  |  | Demonstrative exhibit (stander)                    | U |  |  |  |
| 381 |  |  |  | Demonstrative exhibit (Botox injection needle)     | U |  |  |  |
| 382 |  |  |  | Demonstrative exhibit (Baclofen pump)              | U |  |  |  |

|     |  |  |  |  |  |   |  |  |  |
|-----|--|--|--|--|--|---|--|--|--|
| 383 |  |  |  | Demonstrative exhibits (future med<br>proceeds.) |  | U |  |  |  |
| 384 |  |  |  | Calendars (years 2000 - 2040)                    |  | R |  |  |  |

**OBJECTIONS**

**R: Relevancy**

**H: Hearsay**

**A: Authenticity**

**O: Other (specify)**

**U: Unavailable for Inspection (all objections reserved)**

**FD: Foundation**

Plaintiffs reserve the right to use any and all exhibits listed by any of the Defendants on their Exhibit Lists, as well as any and all documents necessary for impeachment or rebuttal.

Plaintiffs reserve the right to amend their Exhibit List as necessary based on documents not yet received but produced in ongoing discovery or depositions or pursuant to subpoena.

Plaintiffs reserve the right to offer any and all exhibits necessary for the purpose of authentication or laying foundation, as necessary.

Plaintiffs reserve the right to supplement their Exhibit List with demonstrative exhibits, as necessary.

FRANCO RIBEIRO and DEANNA RIBEIRO,  
as individuals and biological parents and next  
friends of LUCAS RIBEIRO, an infant,  
Plaintiffs,

By: /s/ Michael F. Coyle  
Michael F. Coyle, #18299  
Jordan W. Adam, #23723  
Emily J. Wischnowski, #25101  
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ewischnowski@fraserstryker.com  
ATTORNEYS FOR PLAINTIFF

CERTIFICATE OF SERVICE

The undersigned certifies that a true and correct copy of the foregoing Plaintiff's Exhibit List was filed electronically with the United States District Court for the District of Nebraska on March 17, 2017, using the CM/ECF system which sent notification of such filing to the following:

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By: /s/ Michael F. Coyle, #18299

19197-51429/1654062

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEBRASKA

FRANCO RIBEIRO and DEANNA RIBEIRO, )  
as individuals and as next friends and )  
biological parents of LUCAS RIBEIRO, an )  
infant, )

Plaintiffs, )

vs. )

BABY TREND, INC., et al. )

Defendants. )

Case No. 8:12-cv-00204

**PLAINTIFFS' AMENDED  
EXHIBIT LIST WITH  
LERADO'S OBJECTIONS**

COME NOW Plaintiffs, Franco Ribeiro and Deanna Ribeiro, by and through their counsel, and hereby submit the following amended exhibit list, subject to offer:

Trial Date: April 24, 2017

| EXHIBIT NUMBERS |            |      |     | DEP | DESCRIPTION                                  | OFF | OBJ | RCVD | NOT RCVD | DATE |
|-----------------|------------|------|-----|-----|--|-----|-----|------|----------|------|
| PLF             | BT/<br>MDC | IMMI | LER |     |  |     |     |      |          |      |
| 1               |            |      |     | 1   | Notice to Take Depo. (Millennium Develop.)   |     |     |      |          |      |
| 2               |            |      |     | 2   | Resume (Mark Sedlack)                        |     | H   |      |          |      |
| 3               |            |      |     | 3   | MDC's Answers to Interrogatories             |     |     |      |          |      |
| 4               |            |      |     | 4   | Patent for Car Seat (Sedlack) (05-09-06)     |     |     |      |          |      |
| 5               |            |      |     | 5   | Patent for Car Seat (Sedlack) (02-28-06)     |     |     |      |          |      |
| 6               |            |      |     | 6   | Patent for Car Seat (Sedlack) (12-27-05)     |     |     |      |          |      |
| 7               |            |      |     | 7   | Patent for Car Seat (Sedlack) (07-12-05)     |     |     |      |          |      |
| 8               |            |      |     | 8   | Patent for Car Seat (Sedlack) (07-05-05)     |     |     |      |          |      |
| 9               |            |      |     | 9   | Patent for Car Seat (Sedlack) (12-28-04)     |     |     |      |          |      |
| 10              |            |      |     | 10  | Patent for Car Seat (Sedlack) (11-02-04)     |     |     |      |          |      |
| 11              |            |      |     | 11  | Photos (Baby Trend car seat)                 |     |     |      |          |      |
| 12              |            |      |     | 12  | Owner's Manual for Flex-Loc Car Seat (01.04) |     |     |      |          |      |
| 13              |            |      |     | 13  | Owner's Manual for Flex-Loc Car Seat (01.05) |     |     |      |          |      |
| 14              |            |      |     | 14  | Owner's Manual for Flex-Loc Car Seat (01.06) |     |     |      |          |      |
| 15              |            |      |     | 15  | Consultant Agreement (05-13-03)              |     |     |      |          |      |
| 16              |            |      |     | 16  | Consultant Agreement (03-03-00)              |     |     |      |          |      |

|    |  |  |    |  |  |   |  |  |
|----|--|--|----|--|--|---|--|--|
| 17 |  |  | 17 | Car Seat Project Schedule                              |  |   |  |  |
| 18 |  |  | 18 | Car Seat Documents from Mark Sedlack<br>[MDC00741-780] |  |   |  |  |
| 19 |  |  | 19 | Photos (alternative harness for car seat)              |  |   |  |  |
| 20 |  |  | 20 | Patent Information (chest clip)<br>[MDC00016-24]       |  |   |  |  |
| 21 |  |  | 21 | 11-11-05 Email between Defendants                      |  |   |  |  |
| 22 |  |  | 22 | 09-14-05 Email between Defendants                      |  |   |  |  |
| 23 |  |  | 23 | 10-27-05 Email between Defendants                      |  |   |  |  |
| 24 |  |  | 24 | 10-11-05 Email between Defendants                      |  |   |  |  |
| 25 |  |  | 25 | Photo (MGA post-test crash)                            |  |   |  |  |
| 26 |  |  | 26 | ASTM F2050-13a   |  |   |  |  |
| 27 |  |  | 27 | Lerado Car Seat Production Details                     |  |   |  |  |
| 28 |  |  | 28 | Patent Drawings (Latch-Loc car seat)                   |  |   |  |  |
| 29 |  |  | 29 | Photos (crotch buckle)                                 |  |   |  |  |
| 30 |  |  | 30 | Baby Trend Product Catalog (2006-07)                   |  |   |  |  |
| 31 |  |  | 31 | Instruction Manual (Trendsport Trav.) (06-06)          |  |   |  |  |
| 32 |  |  | 32 | Patent Overview (Latch-Loc car seat - travel)          |  | H |  |  |
| 33 |  |  | 33 | Product Description (Latch-Loc car seat)               |  |   |  |  |
| 34 |  |  | 34 | Revisions to FMVSS 213 (08-01-05)                      |  |   |  |  |
| 35 |  |  | 35 | Crash-test Matrix Data (04-12-7)                       |  |   |  |  |
| 36 |  |  | 36 | NHTSA Test Report (Flex-Loc 6325) (06-02-06)           |  |   |  |  |
| 37 |  |  | 37 | NHTSA Test Report (Flex-Loc 6325) (07-24-06)           |  |   |  |  |
| 38 |  |  | 38 | Photo (European car seat)                              |  |   |  |  |
| 39 |  |  | 39 | Photo (European car seat)                              |  |   |  |  |
| 40 |  |  | 40 | Notice to Take Depo (Baby Trend)                       |  |   |  |  |
| 41 |  |  | 41 | Baby Trend Customer Support Log (12-20-11)             |  |   |  |  |
| 42 |  |  | 42 | News Report (Alpha Group acquisition)                  |  |   |  |  |
| 43 |  |  | 43 | Lerado Car Seat Production Agreement                   |  |   |  |  |
| 44 |  |  | 44 | Baby Trend's Answers to Rogs                           |  |   |  |  |
| 45 |  |  | 45 | Baby Trend's Answers to Rogs (Supp. #1)                |  |   |  |  |
| 46 |  |  | 46 | Baby Trend's Answers to Rogs (Supp. #2)                |  |   |  |  |
| 47 |  |  | 47 | Lerado Organizational Charts                           |  |   |  |  |
| 48 |  |  | 48 | 05-09-12 Ltr. from Fraser Stryker                      |  | H |  |  |
| 49 |  |  | 49 | Instruction Manual (Trendsport Trav.) (07-05)          |  |   |  |  |
| 50 |  |  | 50 | Baby Trend's Rule 26(a)(1) Initial Disclosures         |  |   |  |  |

|    |  |  |                           |   |  |   |  |  |
|----|--|--|---------------------------|---|--|---|--|--|
| 51 |  |  | 51                        | Indiana Mills Documents (IMMI.0001-0139)<br>[Plaintiffs will not offer IMMI.0137-0139.] |  |   |  |  |
| 52 |  |  | 52                        | Gnotec Documents  |  |   |  |  |
| 53 |  |  | 53                        | Notice to Take Depo (IMMI)  |  |   |  |  |
| 54 |  |  | 54                        | Photos (A-Lok adjuster strap)   |  |   |  |  |
| 55 |  |  | 55                        | Document Retention Policy (IMMI)  |  |   |  |  |
| 56 |  |  | 56                        | Notice to Take Depo (Deanna Ribeiro)  |  |   |  |  |
| 57 |  |  | 58                        | Photos (Baby Trend car seat) (04-06-16)   |  |   |  |  |
| 58 |  |  | 59                        | Photos (taken from accident scene by KPD)   |  |   |  |  |
| 59 |  |  | 61                        | Safe Kids Checklist (Baby Trend car seat)   |  |   |  |  |
| 60 |  |  | 62                        | Google Map (Ribeiro home)   |  |   |  |  |
| 61 |  |  | 64                        | Drawing (Ribeiro home)  |  |   |  |  |
| 62 |  |  | 65                        | Google Map (Ribeiro home)   |  |   |  |  |
| 63 |  |  | 66                        | Google Map (Ribeiro home)   |  |   |  |  |
| 64 |  |  | 67                        | Records (Kearney Police Department)   |  |   |  |  |
| 65 |  |  | 67C                       | Police Interview (Deanna Ribeiro)   |  | H |  |  |
| 66 |  |  | 67D                       | Police Interview (Franco Ribeiro)   |  | H |  |  |
| 67 |  |  | 68                        | Records (Good Samaritan Hospital)   |  |   |  |  |
| 68 |  |  | 69                        | Records (Kearney Clinic, P.C.)  |  |   |  |  |
| 69 |  |  | 70                        | Curriculum Vitae (Dawn Murray, M.D.)  |  | H |  |  |
| 70 |  |  | 71                        | Curriculum Vitae (Angela Kratochvil, M.D.)  |  | H |  |  |
| 71 |  |  | 72                        | Curriculum Vitae (Katherine Keifer, M.D.)   |  | H |  |  |
| 72 |  |  | 73                        | Good Samaritan H & P  |  |   |  |  |
| 73 |  |  | 74                        | Good Samaritan ER record  |  |   |  |  |
| 74 |  |  | 75                        | Good Samaritan discharge page   |  |   |  |  |
| 75 |  |  | 76                        | Good Samaritan progress note  |  |   |  |  |
| 76 |  |  | 77,<br>p. 24-27,<br>31-38 | Records (Safe Kids Platte Valley)   |  |   |  |  |
| 77 |  |  | 78                        | Safe Kids Checklist Form  |  |   |  |  |
| 78 |  |  | 79                        | Safe Kids Checklist (Baby Trend car seat)   |  |   |  |  |
| 79 |  |  | 80                        | Notes (Officer Dowling)   |  |   |  |  |
| 80 |  |  | 81                        | Photo (accident scene)  |  |   |  |  |
| 81 |  |  | 82                        | Curriculum Vitae (Chandrika Rizal, M.D.)  |  | H |  |  |
| 82 |  |  | 83                        | Medical Records (Chandrika Rizal, M.D.)   |  |   |  |  |
| 83 |  |  | 84                        | Office Visit (Chandrika Rizal, M.D.) (06-21-16)   |  |   |  |  |
| 84 |  |  | 85                        | Office Visit (Chandrika Rizal, M.D.) (04-18-16)   |  |   |  |  |

|     |  |     |   |  |             |  |  |
|-----|--|-----|---|--|-------------|--|--|
| 85  |  | 86  | Medical Bills (Lucas Ribeiro)                 |  |             |  |  |
| 86  |  | 87  | Curriculum Vitae (Suzanne Haney, M.D.)        |  | H           |  |  |
| 87  |  | 88  | Medical Records (Children's Hospital / Phys.) |  |             |  |  |
| 88  |  | 89  | Consult Note (Suzanne Haney) (05-28-11)       |  |             |  |  |
| 89  |  | 90  | Baby Trend Call Logs (Model #6325)            |  |             |  |  |
| 90  |  | 91  | Child Restraint Registration Card (redacted)  |  |             |  |  |
| 91  |  | 92  | Notice to Take Depo (Lerado)                  |  |             |  |  |
| 92  |  | 93  | Plaintiffs' Complaint (7th Amended)           |  | H/O<br>Arg. |  |  |
| 93  |  | 94  | Lerado's Answer to Complaint (7th Amended)    |  | H/O<br>Arg. |  |  |
| 94  |  | 95  | Lerado Company Profile (05-14-06)             |  | H           |  |  |
| 95  |  | 96  | Baby Trend Documents                          |  | F           |  |  |
| 96  |  | 97  | LinkedIn Profile (Roger Hsu)                  |  |             |  |  |
| 97  |  | 98  | Lerado Specification Manual                   |  |             |  |  |
| 98  |  | 99  | Lerado Invoice (06-05-07)                     |  |             |  |  |
| 99  |  | 100 | Lerado Car Seat Issues Spreadsheet            |  |             |  |  |
| 100 |  | 102 | Lerado Test Reports (Lerado.0218-0243)        |  |             |  |  |
| 101 |  | 103 | Photos (car seats)                            |  |             |  |  |
| 102 |  | 104 | Lerado Parts Agreements (March 22, 2007)      |  |             |  |  |
| 103 |  | 105 | Lerado documents (Lerado.0273-0278)           |  |             |  |  |
| 104 |  | 106 | Lerado documents (Lerado.0279-0290)           |  |             |  |  |
| 105 |  | 107 | Lerado Patent List                            |  |             |  |  |
| 106 |  | 108 | MDC documents                                 |  |             |  |  |
| 107 |  | 109 | Baby Trend Purchase Orders                    |  |             |  |  |
| 108 |  | 110 | Notice to Take Depo (Denny Tsai)              |  |             |  |  |
| 109 |  | 111 | Baby Trend Website (02-23-06)                 |  | H           |  |  |
| 110 |  | 112 | Baby Trend Website (02-05-06)                 |  | H           |  |  |
| 111 |  | 113 | Baby Trend Website (03-13-06)                 |  | H           |  |  |
| 112 |  | 114 | Owner's Manual for Flex-Loc Car Seat (01.04)  |  |             |  |  |
| 113 |  | 115 | Baby Trend Website (10-15-07)                 |  | H           |  |  |
| 114 |  | 116 | Baby Trend Call Logs                          |  |             |  |  |
| 115 |  | 117 | Emails between Defendants                     |  |             |  |  |
| 116 |  | 119 | Expert Report (Arthur Hoffmann, P.E.)         |  | H           |  |  |
| 117 |  | 121 | Curriculum Vitae (Arthur Hoffmann, P.E.)      |  | H           |  |  |
| 118 |  | 124 | Expert Report (Kathie Allison)                |  | H           |  |  |

|     |  |  |                         |  |  |          |  |  |
|-----|--|--|-------------------------|--|--|----------|--|--|
| 119 |  |  | 125                     | Curriculum Vitae (Kathie Allison)                      |  | H        |  |  |
| 120 |  |  | 126                     | Expert Report (Prashant Joshi, M.D.)                   |  | H        |  |  |
| 121 |  |  | 130                     | Curriculum Vitae (Kathie Allison)                      |  | H        |  |  |
| 122 |  |  | 131                     | Expert Report (revised) (Kathie Allison)               |  | H        |  |  |
| 123 |  |  | 135                     | Expert Report (John Ward, Ph.D.)                       |  | H        |  |  |
| 124 |  |  | 137                     | Summary of Economic Loss (Lucas Ribeiro)               |  | O<br>Arg |  |  |
| 125 |  |  | 138                     | Educational Attainment (females)                       |  | H        |  |  |
| 126 |  |  | 138A                    | Educational Attainment (males)                         |  | H        |  |  |
| 127 |  |  | 140                     | Expert Report (Kathie Allison)                         |  | H        |  |  |
| 128 |  |  | 143                     | Curriculum Vitae (Fernando Zapata, M.D.)               |  | H        |  |  |
| 129 |  |  | 144                     | Medical Records  |  |          |  |  |
| 130 |  |  | 145                     | Medical Records (CDC Clinic)<br>[CDC.CLINIC.0244-0249] |  |          |  |  |
| 131 |  |  | 146                     | Progress Note (08-11-2012)                             |  |          |  |  |
| 132 |  |  | 148                     | Expert Report (Terry Stentz / Kelli Herstein)          |  | H        |  |  |
| 133 |  |  | 150                     | Curriculum Vitae (Terry Stentz, Ph.D.)                 |  | H        |  |  |
| 134 |  |  | 151                     | Expert File (Terry Stentz, Ph.D.)                      |  | H        |  |  |
| 135 |  |  | 151A                    | Registration Card (Kassidy Hurlbutt)                   |  |          |  |  |
| 136 |  |  | 151B                    | Photos (Baby Trend car seat)                           |  |          |  |  |
| 137 |  |  | 151D                    | Additional Info. (Kelli Herstein, Ph.D.)               |  | H        |  |  |
| 138 |  |  | 154                     | Expert Rebuttal Report (Kelli Herstein, Ph.D.)         |  | H        |  |  |
| 139 |  |  | 175                     | Notice to Take Depo (William Van Arsdell)              |  |          |  |  |
| 140 |  |  | 176                     | Response to Depo. Notice (Van Arsdell)                 |  |          |  |  |
| 141 |  |  | 178,<br>F 2849-<br>2857 | Invoices (Van Arsdell)                                 |  |          |  |  |
| 142 |  |  | 185                     | Notice to Take Depo (James Chinni)                     |  |          |  |  |
| 143 |  |  | 187                     | Invoices (James Chinni)                                |  |          |  |  |
| 144 |  |  | 188                     | Photos (Baby Trend Car Seat)                           |  |          |  |  |
| 145 |  |  | 189                     | Inspection Report (Julia King)                         |  |          |  |  |
| 146 |  |  | 190                     | Product Description Sheet (A38042A)                    |  |          |  |  |
| 147 |  |  | 191                     | Product Description Sheet (F14193)                     |  |          |  |  |
| 148 |  |  | 192                     | Invoices (Michael Prange)                              |  |          |  |  |
| 149 |  |  | 193                     | Photos (Baby Trend car seat)                           |  |          |  |  |
| 150 |  |  | 194                     | Photos (two babies)                                    |  |          |  |  |
| 151 |  |  | 196                     | CAMI 6-Month Old Dummy Information                     |  |          |  |  |

|     |  |  |     |   |  |   |  |  |
|-----|--|--|-----|---|--|---|--|--|
| 152 |  |  | 197 | Photos (CAMI Dummy)   |  |   |  |  |
| 153 |  |  | 200 | Expert Report (Ted Sokol, P.E.)   |  | H |  |  |
| 154 |  |  | 201 | Expert File (Ted Sokol, P.E.)   |  | H |  |  |
| 155 |  |  | 1   | Lerado Car Seat Production Agreement<br>(Depo of Baby Trend, 06-23-2015)                  |  |   |  |  |
| 156 |  |  | 2   | Baby Trend's Answers to Interrogatories<br>(Depo of Baby Trend, 06-23-2015)               |  |   |  |  |
| 157 |  |  | 5   | Communications on OPP Car Seat<br>(Depo of Baby Trend, 06-23-2015)                        |  |   |  |  |
| 158 |  |  | 6   | Communications with Lerado<br>(Depo of Baby Trend, 06-23-2015)                            |  |   |  |  |
| 159 |  |  | 7   | Communications with Lerado<br>(Depo of Baby Trend, 06-23-2015)                            |  |   |  |  |
| 160 |  |  | 8   | Communications with Lerado<br>(Depo of Baby Trend, 06-23-2015)                            |  |   |  |  |
| 161 |  |  | 1   | Corporate Structure (Kendrion)<br>(Depo of Gnotec, 06-24-2015)                            |  |   |  |  |
| 162 |  |  | 2   | Invoices (Kendrion)<br>(Depo of Gnotec, 06-24-2015)                                       |  |   |  |  |
| 163 |  |  | 3   | Spreadsheet (buckle information)<br>(Depo of Gnotec, 06-24-2015)                          |  |   |  |  |
| 164 |  |  | 4   | Corporate Structure (Kendrion / Gnotec)<br>(Depo of Gnotec, 06-24-2015)                   |  |   |  |  |
| 165 |  |  | 1   | Notice to Take Depo (Lerado Zhong Shan)<br>(Depo of Lerado Zhong Shan, 08-19-2015)        |  |   |  |  |
| 166 |  |  | 2   | Lerado Car Seat Production Agreement<br>(Depo of Lerado Zhong Shan, 08-19-2015)           |  |   |  |  |
| 167 |  |  | 4   | Invoice (Kendrion)<br>(Depo of Lerado Zhong Shan, 08-19-2015)                             |  |   |  |  |
| 168 |  |  | 1   | Notice to Take Depo (Lerado Group Holding)<br>(Depo of Lerado Group Holding, 11-11-2015)  |  |   |  |  |
| 169 |  |  | 2   | Notice to Take Depo (Lerado China Limited)<br>(Depo of Lerado Group Holding, 11-11-2015)  |  |   |  |  |
| 170 |  |  | 3   | Notice to Take Depo (Lerado Group Co. Ltd.)<br>(Depo of Lerado Group Holding, 11-11-2015) |  |   |  |  |
| 171 |  |  | 4   | Notice to Take Depo (Lerado H.K. Limited)<br>(Depo of Lerado Group Holding, 11-11-2015)   |  |   |  |  |
| 172 |  |  | 5   | Lerado Car Seat Production Agreement<br>(Depo of Lerado Group Holding, 11-11-2015)        |  |   |  |  |
| 173 |  |  | 6   | Lerado Organizational Chart   |  |   |  |  |

|     |  |  |    |  |   |  |          |  |  |
|-----|--|--|----|--|---|--|----------|--|--|
|     |  |  |    |  | (Depo of Lerado Group Holding, 11-11-2015)  |  |          |  |  |
| 174 |  |  | 7  |  | Meeting Minutes (Lerado China Limited)<br>(Depo of Lerado Group Holding, 11-11-2015)      |  |          |  |  |
| 175 |  |  | 8  |  | Lerado Group Holding Annual Report (2006)<br>(Depo of Lerado Group Holding, 11-11-2015)   |  |          |  |  |
| 176 |  |  | 12 |  | Stock Certificate (Lerado Group Limited)<br>(Depo of Lerado Group Holding, 11-11-2015)    |  | F/H      |  |  |
| 177 |  |  | 13 |  | Delaware SOS Listing (Lerado Success, Inc.)<br>(Depo of Lerado Group Holding, 11-11-2015) |  | F        |  |  |
| 178 |  |  | 14 |  | Pennsylvania SOS Listing (Lerado Success)<br>(Depo of Lerado Group Holding, 11-11-2015)   |  | F        |  |  |
| 179 |  |  | 15 |  | Stock Certificate (Mia Moda Inc.)<br>(Depo of Lerado Group Holding, 11-11-2015)           |  | F/H      |  |  |
| 180 |  |  | 16 |  | Pennsylvania SOS Listing (Mia Moda Inc.)<br>(Depo of Lerado Group Holding, 11-11-2015)    |  | F        |  |  |
| 181 |  |  | 17 |  | South Carolina SOS Listing (Mia Moda Inc.)<br>(Depo of Lerado Group Holding, 11-11-2015)  |  | F        |  |  |
| 182 |  |  | 18 |  | 10-31-07 Ltr. from Mia Moda Inc. to NHTSA<br>(Depo of Lerado Group Holding, 11-11-2015)   |  | F/H      |  |  |
| 183 |  |  | 19 |  | NHTSA Consumer Advisory (Lerado recall)<br>(Depo of Lerado Group Holding, 11-11-2015)     |  | O<br>404 |  |  |
| 184 |  |  | 20 |  | Lerado document (chest clip)<br>(Depo of Lerado Group Holding, 11-11-2015)                |  |          |  |  |
| 185 |  |  | 22 |  | Lerado Group Holdings Customer List<br>(Depo of Lerado Group Holding, 11-11-2015)         |  |          |  |  |
| 186 |  |  | 23 |  | Invoice (Kendrion)<br>(Depo of Lerado Group Holding, 11-11-2015)                          |  |          |  |  |
| 187 |  |  | 26 |  | NHTSA Recall Information (Lerado recall)<br>(Depo of Lerado Group Holding, 11-11-2015)    |  | O<br>404 |  |  |
| 188 |  |  | 28 |  | Invoices (Kendrion)<br>(Depo of Lerado Group Holding, 11-11-2015)                         |  |          |  |  |
| 189 |  |  |    |  | Photos (KPD - accident scene)<br>[KPD.0001-0263]  |  |          |  |  |
| 190 |  |  |    |  | Photos (KPD - at station)<br>[PHOTOS.020-050]   |  |          |  |  |
| 191 |  |  |    |  | Police Interview (Deanna Ribeiro) - audio   |  | H        |  |  |
| 192 |  |  |    |  | Police Interview (Deanna Ribeiro) - transcript  |  | H        |  |  |
| 193 |  |  |    |  | Photos (Baby Trend car seat)<br>[RIBEIRO.0321-0432]                                       |  |          |  |  |
| 194 |  |  |    |  | Photos (Arthur Hoffmann, P.E.)  |  |          |  |  |

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| 195 |  |  |     | Photos (Terry Stentz / Kelli Herstein)   |  |  |  |  |
| 196 |  |  |     | Photos (Ted Sokol, P.E.)   |  |  |  |  |
| 197 |  |  |     | Photos (Car Seat Inspection) (04/06/2016)<br>[Ribeiro.EP0001-0332]                       |  |  |  |  |
| 198 |  |  |     | Photos (Car Seat Inspection) (01/18/2017)<br>[Ribeiro.EP0333-0739]                       |  |  |  |  |
| 199 |  |  |     | Photos (Car Seat Inspection) (01/18/2017)<br>[RibeiroInspection.001-153] (Prange photos) |  |  |  |  |
| 200 |  |  |     | Video (Car Seat Inspection) (04/06/2016)   |  |  |  |  |
| 201 |  |  |     | Video (Car Seat Inspection) (01/18/2017)   |  |  |  |  |
| 202 |  |  |     | Photos (Alex and Lucas Ribeiro)<br>[Ribeiro.0433-0452]                                   |  |  |  |  |
| 203 |  |  |     | Photos (Lucas Ribeiro)<br>[PHOTOS.001-019]   |  |  |  |  |
| 204 |  |  |     | Photos (Lucas Ribeiro)<br>[RIBEIRO.0001-0318]  |  |  |  |  |
| 205 |  |  |     | Photos (Ribeiro family)  |  |  |  |  |
| 206 |  |  | 133 | Photos (taken by Kathie Allison)<br>[Depo. Ex. 133, pp. 3-10, 58]                        |  |  |  |  |
| 207 |  |  |     | Photos (Medical Supplies)<br>[RIBEIRO.0453-0462]   |  |  |  |  |
| 208 |  |  |     | Video (Day in Life of Lucas)   |  |  |  |  |
| 209 |  |  |     | Baby Trend Website (CRS products) (03-13-06)   |  |  |  |  |
| 210 |  |  |     | Baby Trend Website (strollers) (03-13-06)  |  |  |  |  |
| 211 |  |  |     | Affidavit (Brad Mattarocci)<br>[Filing No. 475-13]                                       |  |  |  |  |
| 212 |  |  |     | Affidavit (Chip Whalen)<br>[Filing No. 475-14]   |  |  |  |  |
| 213 |  |  |     | Affidavit (Denny Tsai)<br>[Filing No. 475-15]  |  |  |  |  |
| 214 |  |  |     | Baby Trend Car Seat involved in accident   |  |  |  |  |
| 215 |  |  |     | Lerado Test Reports (Lerado.0244-0263)   |  |  |  |  |
| 216 |  |  |     | Photos (MGA sled tests)<br>[BT.DocProd.11001-11006]                                      |  |  |  |  |
| 217 |  |  |     | Photos (MGA sled tests)<br>[BT.DocProd.12948-12955]                                      |  |  |  |  |
| 218 |  |  |     | Registration Card (unredacted)   |  |  |  |  |
| 219 |  |  |     | 10-23-02 Ltr. from Chip Whalen<br>[BT.MDC.File.388]                                      |  |  |  |  |

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| 220 |  |  |  | 06-05-06 Ltr. from Mark Sedlack<br>[BT.MDC.File.390]                         |  |   |  |  |  |
| 221 |  |  |  | MDC Consultant Agreement Summary<br>[BT.MDC.File.369]                        |  | H |  |  |  |
| 222 |  |  |  | Royalty Agreement (Baby Trend / MDC)<br>[BT.MDC.File.53]                     |  |   |  |  |  |
| 223 |  |  |  | Royalty Agreement Settlement (BT / MDC)<br>[BT.MDC.File.54]                  |  |   |  |  |  |
| 224 |  |  |  | Royalty Payments (MDC)<br>[BT.MDC.File. -- various Bates stamps]             |  |   |  |  |  |
| 225 |  |  |  | Royalty Payments Spreadsheet (MDC)<br>[BT.MDC.File. -- various Bates stamps] |  |   |  |  |  |
| 226 |  |  |  | Lerado Car Seat Production Details (#2)<br>[BT.MDC.File.443-457]             |  |   |  |  |  |
| 227 |  |  |  | Baby Trend Production Summary (2002-2007)<br>[BT.MDC.File.394-95]            |  |   |  |  |  |
| 228 |  |  |  | Medical Records (American Med Response)<br>[AMR.001-021]                     |  |   |  |  |  |
| 229 |  |  |  | Medical Records (Apria Healthcare, Inc.)<br>[APRIA.001-075]                  |  |   |  |  |  |
| 230 |  |  |  | Medical Records (Children's Develop. Clinic)<br>[CDC.CLINIC.001-249]         |  |   |  |  |  |
| 231 |  |  |  | Medical Records (Children's Home Health)<br>[CHILDRENSHOMEHEALTH.001-196]    |  |   |  |  |  |
| 232 |  |  |  | Medical Records (Children's Hospital)<br>[CMH.0001-0925]                     |  |   |  |  |  |
| 233 |  |  |  | Medical Records (Children's Physicians)<br>[RIZAL.001-125]                   |  |   |  |  |  |
| 234 |  |  |  | Medical Records (Children's Specialty Phys.)<br>[CSP.0001-0053]              |  |   |  |  |  |
| 235 |  |  |  | Medical Records (Craig Home Care)<br>[CRAIG.001-414]                         |  |   |  |  |  |
| 236 |  |  |  | Medical Records (ENT Specialists, P.C.)<br>[ENT.001-083]                     |  |   |  |  |  |
| 237 |  |  |  | Medical Records (Family Physical Therapy)<br>[FPT.00001-00395]               |  |   |  |  |  |
| 238 |  |  |  | Medical Records (Good Samaritan Hospital)<br>[GSH.0001-0090]                 |  |   |  |  |  |
| 239 |  |  |  | Medical Records (Great Plains Radiology)<br>[GPR.001-009]                    |  |   |  |  |  |

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| 240 |  |  |  | Medical Records (Hangar Clinic)<br>[HANGER.001-013]  |  |            |  |  |
| 241 |  |  |  | Medical Records (Kearney Clinic, P.C.)<br>[KC.0001-0209]   |  |            |  |  |
| 242 |  |  |  | Medical Records (Kids On the Move)<br>[KIDSONTHE MOVE.001-045]                                     |  |            |  |  |
| 243 |  |  |  | Medical Records (Madonna Rehab Hospital)<br>[Madonna.0001-0061]                                    |  |            |  |  |
| 244 |  |  |  | Medical Records (Maxim Healthcare)<br>[MAXIM.0001-1271]  |  |            |  |  |
| 245 |  |  |  | Medical Records (NPPI Anesthesiology)<br>[NPPI.001-052]  |  |            |  |  |
| 246 |  |  |  | Medical Records (Orthomedics Omaha)<br>[ORTHOMEDICS.001-010]                                       |  |            |  |  |
| 247 |  |  |  | Medical Records (Rehabilitation Specialists)<br>[REHAB.SP.001-022]                                 |  |            |  |  |
| 248 |  |  |  | Medical Records (Total Respiratory & Rehab)<br>[TRR.001-091]                                       |  |            |  |  |
| 249 |  |  |  | Medical Records (Lucas Ribeiro)  |  |            |  |  |
| 250 |  |  |  | Medical Bills<br>[MEDICAL.BILLS.0001-1269]   |  |            |  |  |
| 251 |  |  |  | Medical Bills (Children's Home Health)<br>[Children's.Home.Healthcare.Bill.for.March.2007 001-002] |  |            |  |  |
| 252 |  |  |  | Medical Bills (Lucas Ribeiro)  |  |            |  |  |
| 253 |  |  |  | Summary of Medical Bills   |  |            |  |  |
| 254 |  |  |  | Mortality / Life Tables  |  |            |  |  |
| 255 |  |  |  | Records (Elkhorn Public Schools)<br>[ELKHORN.PUBLIC.SCHOOLS.001-038]                               |  |            |  |  |
| 256 |  |  |  | Records (Kearney Public Schools)<br>[KEARNEY PUBLIC SCHOOLS 001-054]                               |  |            |  |  |
| 257 |  |  |  | Records (Millard Public Schools)<br>[MILLARD.PUBLIC.SCHOOLS.001-027]                               |  |            |  |  |
| 258 |  |  |  | Records (Munroe Meyer Institute)<br>[MUNROE MEYER 001-020]   |  |            |  |  |
| 259 |  |  |  | Records (Omaha Public Schools)<br>[OMAHA.PUBLIC.SCHOOLS.001-406]                                   |  |            |  |  |
| 260 |  |  |  | Kearney Hub newspaper article  |  |            |  |  |
| 261 |  |  |  | U.S. CPSC Report: "Nursery Product-Related Injuries and Deaths" (Nov. 2010)                        |  | H/<br>1006 |  |  |
| 262 |  |  |  | U.S. CPSC Report: "Hand-Held Infant  |  | H/         |  |  |

|     |  |  |  |   |            |  |  |
|-----|--|--|--|---|------------|--|--|
|     |  |  |  | Carriers" (11-07-2012)  | 1006       |  |  |
| 263 |  |  |  | U.S. CPSC Report: "Draft Final Rule for Hand-Held Infant Carriers" (10-30-2013) | H/<br>1006 |  |  |
| 264 |  |  |  | Rule 1006 Summaries   | 1006       |  |  |
| 265 |  |  |  | Curriculum Vitae (Arthur Hoffmann, P.E.)  | H          |  |  |
| 266 |  |  |  | Expert Report (Arthur Hoffmann, P.E.)   | H/O<br>702 |  |  |
| 267 |  |  |  | Expert Rebuttal Report (Art Hoffmann, P.E.)                                     | H/O<br>702 |  |  |
| 268 |  |  |  | Curriculum Vitae (Terry Stentz, Ph.D.)  | H          |  |  |
| 269 |  |  |  | Expert Report (Stentz and Herstein, Ph.D.)                                      | H/O<br>702 |  |  |
| 270 |  |  |  | Expert Rebuttal Report (Terry Stentz, Ph.D.)                                    | H/O<br>702 |  |  |
| 271 |  |  |  | Curriculum Vitae (Kelli Herstein, Ph.D.)  | H          |  |  |
| 272 |  |  |  | Expert Rebuttal Report (Kelli Herstein, Ph.D.)                                  | H/O<br>702 |  |  |
| 273 |  |  |  | Curriculum Vitae (Ted Sokol, P.E.)  | H          |  |  |
| 274 |  |  |  | Expert Rebuttal Report (Ted Sokol, P.E.)  | H/O<br>702 |  |  |
| 275 |  |  |  | Curriculum Vitae (Prashant Joshi, M.D.)   | H          |  |  |
| 276 |  |  |  | Expert Report (Prashant Joshi, M.D.)  | H/O<br>702 |  |  |
| 277 |  |  |  | Expert Rebuttal Report (Prashant Joshi, M.D.)                                   | H/O<br>702 |  |  |
| 278 |  |  |  | Curriculum Vitae (Kathie Allison)   | H          |  |  |
| 279 |  |  |  | Expert Report (Kathie Allison)  | H/O<br>702 |  |  |
| 280 |  |  |  | Expert Rebuttal Report (Kathie Allison)   | H/O<br>702 |  |  |
| 281 |  |  |  | Life Care Plan (revised) (Kathie Allison)                                       | H/O<br>702 |  |  |
| 282 |  |  |  | Curriculum Vitae (John Ward, Ph.D.)   | H          |  |  |
| 283 |  |  |  | Expert Report (John Ward, Ph.D.)  | H/O<br>702 |  |  |
| 284 |  |  |  | Expert Rebuttal Report (John Ward, Ph.D.)                                       | H/O<br>702 |  |  |
| 285 |  |  |  | Depo Transcript/Video (Baby Trend) (2015)                                       |            |  |  |
| 286 |  |  |  | Depo Transcript/Video (Baby Trend) (2016)                                       |            |  |  |
| 287 |  |  |  | Depo Transcript/Video (Chip Whalen)   |            |  |  |
| 288 |  |  |  | Depo Transcript/Video (Denny Tsai)  |            |  |  |

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| 289 |  |  |  | Depo Transcript/Video (Betty Tsai)              |  |  |  |  |  |
| 290 |  |  |  | Depo Transcript/Video (MDC)                     |  |  |  |  |  |
| 291 |  |  |  | Depo Transcript/Video (IMMI)                    |  |  |  |  |  |
| 292 |  |  |  | Depo Transcript/Video (Lerado Zhong Shan)       |  |  |  |  |  |
| 293 |  |  |  | Depo Transcript/Video (Lerado Group Hldg.)      |  |  |  |  |  |
| 294 |  |  |  | Depo Transcript/Video (Lerado Defs.) (2016)     |  |  |  |  |  |
| 295 |  |  |  | Depo Transcript/Video (Gnotec)                  |  |  |  |  |  |
| 296 |  |  |  | Depo Transcript/Video (Deanna Ribeiro) (#1)     |  |  |  |  |  |
| 297 |  |  |  | Depo Transcript/Video (Deanna Ribeiro) (#2)     |  |  |  |  |  |
| 298 |  |  |  | Depo Transcript/Video (Franco Ribeiro)          |  |  |  |  |  |
| 299 |  |  |  | Depo Transcript/Video (Melody Gough)            |  |  |  |  |  |
| 300 |  |  |  | Depo Transcript/Video (Elias Abdallah)          |  |  |  |  |  |
| 301 |  |  |  | Depo Transcript/Video (Tara Abdallah)           |  |  |  |  |  |
| 302 |  |  |  | Depo Transcript/Video (Karen Lewandowski)       |  |  |  |  |  |
| 303 |  |  |  | Depo Transcript/Video (Michael Lewandowski)     |  |  |  |  |  |
| 304 |  |  |  | Depo Transcript/Video (David Sesna)             |  |  |  |  |  |
| 305 |  |  |  | Depo Transcript/Video (Michael Young)           |  |  |  |  |  |
| 306 |  |  |  | Depo Transcript/Video (Joshua Salter)           |  |  |  |  |  |
| 307 |  |  |  | Depo Transcript/Video (Dennis Hill)             |  |  |  |  |  |
| 308 |  |  |  | Depo Transcript/Video (Jeff Dowling)            |  |  |  |  |  |
| 309 |  |  |  | Depo Transcript/Video (Betty Lewis)             |  |  |  |  |  |
| 310 |  |  |  | Depo Transcript/Video (Christopher Jarmin)      |  |  |  |  |  |
| 311 |  |  |  | Depo Transcript/Video (Joseph Graf)             |  |  |  |  |  |
| 312 |  |  |  | Depo Transcript/Video (Bill Maendele)           |  |  |  |  |  |
| 313 |  |  |  | Depo Transcript/Video (Jamie Cummings)          |  |  |  |  |  |
| 314 |  |  |  | Depo Transcript/Video (Jaqueline Liess)         |  |  |  |  |  |
| 315 |  |  |  | Depo Transcript/Video (Karen Triplett)          |  |  |  |  |  |
| 316 |  |  |  | Depo Transcript/Video (Art Hoffmann, P.E.)      |  |  |  |  |  |
| 317 |  |  |  | Depo Transcript/Video (Terry Stentz, Ph.D.)     |  |  |  |  |  |
| 318 |  |  |  | Depo Transcript/Video (Kelli Herstein, Ph.D.)   |  |  |  |  |  |
| 319 |  |  |  | Depo Transcript/Video (Ted Sokol, P.E.)         |  |  |  |  |  |
| 320 |  |  |  | Depo Transcript/Video (Dawn Murray, M.D.)       |  |  |  |  |  |
| 321 |  |  |  | Depo Transcript/Video (Angela Kratochvil, M.D.) |  |  |  |  |  |
| 322 |  |  |  | Depo Transcript/Video (Katherine Keifer, M.D.)  |  |  |  |  |  |
| 323 |  |  |  | Depo Transcript/Video (Suzanne Haney, M.D.)     |  |  |  |  |  |
| 324 |  |  |  | Depo Transcript/Video (Chandrika Rizal, M.D.)   |  |  |  |  |  |

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| 325 |  |  |  | Depo Transcript/Video (Fernando Zapata, M.D.)  |     |  |  |  |
| 326 |  |  |  | Depo Transcript/Video (Prashant Joshi, M.D.)   |     |  |  |  |
| 327 |  |  |  | Depo Transcript/Video (Kathie Allison)   |     |  |  |  |
| 328 |  |  |  | Depo Transcript/Video (John Ward, Ph.D.)   |     |  |  |  |
| 329 |  |  |  | Depo Transcript/Video (William Van Arsdell)  |     |  |  |  |
| 330 |  |  |  | Depo Transcript/Video (James Chinni)   |     |  |  |  |
| 331 |  |  |  | Depo Transcript/Video (Michael Prange)   |     |  |  |  |
| 332 |  |  |  | Materials considered by Art Hoffmann, P.E., in conjunction with his expert reports     | H   |  |  |  |
| 333 |  |  |  | Materials considered by Terry Stentz, Ph.D., in conjunction with his expert reports    | H   |  |  |  |
| 334 |  |  |  | Materials considered by Kelli Herstein, Ph.D., in conjunction with her expert reports  | H   |  |  |  |
| 335 |  |  |  | Materials considered by Ted Sokol, P.E., in conjunction with his expert report         | H   |  |  |  |
| 336 |  |  |  | Materials considered by Prashant Joshi, M.D., in conjunction with his expert reports   | H   |  |  |  |
| 337 |  |  |  | Materials considered by Kathie Allison in conjunction with her expert reports          | H   |  |  |  |
| 338 |  |  |  | Materials considered by John Ward, Ph.D., in conjunction with his expert reports       | H   |  |  |  |
| 339 |  |  |  | Lerado's Rule 26(a)(1) Disclosures   | H   |  |  |  |
| 340 |  |  |  | Lerado's Rule 26(a)(1) Disclosures (Supp. #1)  |     |  |  |  |
| 341 |  |  |  | Lerado's Rule 26(a)(1) Disclosures (Supp. #2)  |     |  |  |  |
| 342 |  |  |  | Lerado's Answers to Interrogatories  |     |  |  |  |
| 343 |  |  |  | Lerado's Response to RFPD  |     |  |  |  |
| 344 |  |  |  | Lerado's Response to RFPD (Supp. #1)   |     |  |  |  |
| 345 |  |  |  | Lerado's Response to RFPD (Supp. #2)   |     |  |  |  |
| 346 |  |  |  | Lerado Documents<br>[Lerado.0001-0396]   |     |  |  |  |
| 347 |  |  |  | Other exhibits necessary to refute or support anything else that comes up in discovery | H/F |  |  |  |
| 348 |  |  |  | Baby Trend exemplar car seats / components   |     |  |  |  |
| 349 |  |  |  | Exemplar car seats / components  |     |  |  |  |
| 350 |  |  |  | CAMI Dummy   |     |  |  |  |
| 351 |  |  |  | Videos (Infants Self-Rocking in Car Seats)   | H   |  |  |  |

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| 352 |  |  |  | Videos (Infants in Bouncers)                       |  | H |  |  |  |
| 353 |  |  |  | Demonstrative exhibits for Art Hoffmann, P.E.      |  |   |  |  |  |
| 354 |  |  |  | Demonstrative exhibits for Terry Stentz, Ph.D.     |  |   |  |  |  |
| 355 |  |  |  | Demonstrative exhibits for Kelli Herstein, Ph.D.   |  |   |  |  |  |
| 356 |  |  |  | Demonstrative exhibits for Ted Sokol, P.E.         |  |   |  |  |  |
| 357 |  |  |  | Demonstrative exhibits for Prashant Joshi, M.D.    |  |   |  |  |  |
| 358 |  |  |  | Demonstrative exhibits for Kathie Allison          |  |   |  |  |  |
| 359 |  |  |  | Demonstrative exhibits for John Ward, Ph.D.        |  |   |  |  |  |
| 360 |  |  |  | Radiology Imaging of Lucas                         |  |   |  |  |  |
| 361 |  |  |  | Demonstrative exhibits (human body)                |  |   |  |  |  |
| 362 |  |  |  | Demonstrative exhibits (past med procedures)       |  |   |  |  |  |
| 363 |  |  |  | Demonstrative exhibits (Lucas' injuries/illnesses) |  |   |  |  |  |
| 364 |  |  |  | Demonstrative exhibits (med. equip / supplies)     |  |   |  |  |  |
| 365 |  |  |  | Demonstrative exhibit (medications)                |  |   |  |  |  |
| 366 |  |  |  | Demonstrative exhibit (oxygen tank)                |  |   |  |  |  |
| 367 |  |  |  | Demonstrative exhibit (nebulizer)                  |  |   |  |  |  |
| 367 |  |  |  | Demonstrative exhibit (suction and supplies)       |  |   |  |  |  |
| 368 |  |  |  | Demonstrative exhibit (trach care)                 |  |   |  |  |  |
| 369 |  |  |  | Demonstrative exhibit (trach oxygen trap)          |  |   |  |  |  |
| 370 |  |  |  | Demonstrative exhibit (formula)                    |  |   |  |  |  |
| 371 |  |  |  | Demonstrative exhibit (feeding tube)               |  |   |  |  |  |
| 372 |  |  |  | Demonstrative exhibit (feeding pump)               |  |   |  |  |  |
| 373 |  |  |  | Demonstrative exhibit (feeding supplies)           |  |   |  |  |  |
| 374 |  |  |  | Demonstrative exhibit (diapers)                    |  |   |  |  |  |
| 375 |  |  |  | Demonstrative exhibit (leg bag)                    |  |   |  |  |  |
| 376 |  |  |  | Demonstrative exhibit (hand splints)               |  |   |  |  |  |
| 377 |  |  |  | Demonstrative exhibit (ankle foot orthoses)        |  |   |  |  |  |
| 378 |  |  |  | Demonstrative exhibit (GJ button)                  |  |   |  |  |  |
| 379 |  |  |  | Demonstrative exhibit (wheelchair)                 |  |   |  |  |  |
| 380 |  |  |  | Demonstrative exhibit (stander)                    |  |   |  |  |  |
| 381 |  |  |  | Demonstrative exhibit (Botox injection needle)     |  |   |  |  |  |
| 382 |  |  |  | Demonstrative exhibit (Baclofen pump)              |  |   |  |  |  |
| 383 |  |  |  | Demonstrative exhibits (future med proceds.)       |  |   |  |  |  |
| 384 |  |  |  | Calendars (years 2000 - 2040)                      |  |   |  |  |  |

**OBJECTIONS**

**R: Relevancy**  
**H: Hearsay**  
**A: Authenticity**  
**O: Other (specify)**  
**U: Unavailable for Inspection (all objections reserved)**  
**FD: Foundation**

Plaintiffs reserve the right to use any and all exhibits listed by any of the Defendants on their Exhibit Lists, as well as any and all documents necessary for impeachment or rebuttal.

Plaintiffs reserve the right to amend their Exhibit List as necessary based on documents not yet received but produced in ongoing discovery or depositions or pursuant to subpoena.

Plaintiffs reserve the right to offer any and all exhibits necessary for the purpose of authentication or laying foundation, as necessary.

Plaintiffs reserve the right to supplement their Exhibit List with demonstrative exhibits, as necessary.

FRANCO RIBEIRO and DEANNA RIBEIRO,  
as individuals and biological parents and next  
friends of LUCAS RIBEIRO, an infant,  
Plaintiffs,

By: /s/ Michael F. Coyle  
Michael F. Coyle, #18299  
Jordan W. Adam, #23723  
Emily J. Wischnowski, #25101  
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[jadam@fraserstryker.com](mailto:jadam@fraserstryker.com)  
[ewischnowski@fraserstryker.com](mailto:ewischnowski@fraserstryker.com)  
ATTORNEYS FOR PLAINTIFF

CERTIFICATE OF SERVICE

The undersigned certifies that a true and correct copy of the foregoing Plaintiff's Exhibit List was filed electronically with the United States District Court for the District of Nebraska on March 17, 2017, using the CM/ECF system which sent notification of such filing to the following:

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By: /s/ Michael F. Coyle, #18299

19197-51429/1654062

IN THE UNITED STATES DISTRICT COURT FOR THE  
DISTRICT OF NEBRASKA

FRANCO RIBEIRO and DEANNA RIBEIRO, )  
as individuals and as next friends and )  
biological parents of LUCAS RIBEIRO, )  
an infant, )

Plaintiffs, )

v. )

BABY TREND, INC., ET AL. )

Defendants )

IMMI's AMENDED  
LIST OF EXHIBITS

Case Number: 8:12CV204  
Courtroom Deputy:  
Court Reporter:

Trial Date(s): 4/24/17

**SCHEDULE B**

Non-highlighted=expects to offer; **Highlighted document=may offer**

| EXHIBIT NO. |      |       | DESCRIPTION                                  | OFF | OBJ   | RCVD | NOT RCVD | DATE |
|-------------|------|-------|--|-----|-------|------|----------|------|
| PL          | DF   | 3 PTY |  |     |       |      |          |      |
|             | 1000 |       | National standard incident report (MMI 1-23) |     | FD, H |      |          |      |
|             | 1001 |       | 2007 pendulum test data (IMMI 24-81)         |     | FD, H |      |          |      |
|             | 1002 |       | Audit sequence test data (IMMI 82-83)        |     | FD, H |      |          |      |
|             | 1003 |       | Audit sequence test data (IMMI 84-85)        |     | FD, H |      |          |      |
|             | 1004 |       | Test procedure cycling (IMMI 86)             |     | FD, H |      |          |      |
|             | 1005 |       | 209 salt spray (IMMI 87-88)                  |     | FD, H |      |          |      |
|             | 1006 |       | Audit sequence R44 (IMMI 89-90)              |     | FD, H |      |          |      |
|             | 1007 |       | QALP-0409 (IMMI 91)                          |     | FD, H |      |          |      |
|             | 1008 |       | QALP-0114 (IMMI 92)                          |     | FD, H |      |          |      |
|             | 1009 |       | Tensile strength (IMMI 93-108)               |     | FD, H |      |          |      |
|             | 1010 |       | Tensile test data (IMMI 109-113)             |     | FD, H |      |          |      |
|             | 1011 |       | Alok micro slip (IMMI 114-126)               |     | FD, H |      |          |      |
|             | 1012 |       | LOT number data (IMMI 127)                   |     |       |      |          |      |

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|------|--|--|--|-----------------|--|--|--|
| 1013 |  | Sales history data (IMMI 128)  |  |                 |  |  |  |
| 1014 |  | Lerado orders (IMMI 129)   |  |                 |  |  |  |
| 1015 |  | Lerado orders (IMMI 130)   |  |                 |  |  |  |
| 1016 |  | CHDC (IMMI 131)  |  |                 |  |  |  |
| 1017 |  | BOM (IMMI 132)   |  |                 |  |  |  |
| 1018 |  | Product description sheet (IMMI 133)   |  |                 |  |  |  |
| 1019 |  | REV history (IMMI 134)   |  |                 |  |  |  |
| 1020 |  | Quote (IMMI 135-136)   |  |                 |  |  |  |
| 1021 |  | IMMI inspection photos   |  |                 |  |  |  |
| 1022 |  | Kearney Police Department photos (KPD 1-263)   |  |                 |  |  |  |
| 1023 |  | Baby Trend University of Michigan Transportation Research Institute (BT1-10015)  |  | H, A, FD, (ALL) |  |  |  |
| 1024 |  | Baby Trend BOM's Original Development OPP + 2005 Changes; OPP Files Flex-Loc From Laredo/Airmate 5-2004 (BT10016-10974)  |  | H, A, FD, (ALL) |  |  |  |
| 1025 |  | Baby Trend MGA Research Corporation; Baby Trend Flex-Loc Model 6373 Child Restraint Tests; Reports, Photos and Videos; Test Date 2/09/05; Baby Trend Flex-Loc Model 6373 Child Restraint Tests; Reports, Photos and Videos; Test Date: 2/28-3/01/05; Baby Trend Flex-Loc Child Restraint Tests; Reports, Photos, Videos; Test Date 6/16-17/05; Baby Trend Flex-Loc Child Restraint Tests; Reports, Photos, Video; Test Date: 7/12/05; Baby Trend Flex-Loc and Latch-Loc Child Restraint Tests; Reports, Photos, Videos; Test Date: 11/18 & 21/05 (BT10975-12364) |  | H, A, FD, (ALL) |  |  |  |

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| 1026 |  | MGA Research Corporation: Baby Trend Latch-Loc Child Restraint Tests; Reports, Photos, Videos; Test Date: 1/06/06; Baby Trend Latch-Loc Child Restraint Tests; Reports, Photos, Videos; Test Date: 2/27 & 3/07/06; Baby Trend Latch-Loc Child Restraint Test; Reports, Photos, Videos; Test Date: 3/20 & 3/28/06; Baby Trend Latch-Loc Child Restraint Tests; Reports, Photos, Videos; Test Date: 10/23/06; Baby Trend Experimental Mixed Production and Previously Manufactured Product Child Restraint Tests; Reports, Photos, Videos; Test Date: 12/07/06 (BT12365-12755) |  | H, A, FD, (ALL) |  |  |  |
| 1027 |  | MGA Research Corporation; Baby Trend Flex-Loc Child Restraint Tests; Reports, Photos, Videos; Test Date: 5/25/07; Baby Trend Model 6532 Pre-Production Child Restraint Tests; Reports, Photos, Videos; Test Date: 4/12-13 & 5/02 & 11/07 (BT12756-13057)   |  | H, A, FD, (ALL) |  |  |  |
| 1028 |  | Baby Trend Documents (BT13058-13139)   |  | H, A, FD, (ALL) |  |  |  |
| 1029 |  | Intertek Reports (BT13279-13290)   |  | H, A, FD, (ALL) |  |  |  |
| 1030 |  | NHTSA Reports (BT13291-13378)  |  | H, A, FD, (ALL) |  |  |  |
| 1031 |  | BT EP Inspection Photos 4/6/16 (Ribeiro EP1-332)   |  |                 |  |  |  |
| 1032 |  | BT EP Inspection Photos 1/18/17 (Ribeiro EP333-739)  |  |                 |  |  |  |
| 1033 |  | BT Prange Inspection Photos 1/18/17 (Prange 1-39)  |  |                 |  |  |  |
| 1034 |  | BT Wood Inspection Photos 1/18/17 (Wood 1-27)  |  |                 |  |  |  |
| 1035 |  | MDC 2005 Changes (MDC 1-174)   |  | H, A, FD, (ALL) |  |  |  |
| 1036 |  | MDC Latch-Loc (MDC 175-1009)   |  | H, A, FD, (ALL) |  |  |  |

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| 1037 |  | MDC OPP Base MDC 1010-1492)  |  | H, A, FD, (ALL) |  |  |  |
| 1038 |  | MDC OPP Base Foot (MDC1493-1499)   |  | H, A, FD, (ALL) |  |  |  |
| 2039 |  | MDC 213 Instructions; 213-2005; Development Schedule; ICS Contract Final; ICS Contract Final 2; ICS Contract Exhibit A; ICS Contract Signature Page; MDC Production; MDC's Paper File; OPP Infant Care Seat Final Contract; Patent Numbers; Recap of Dates Infant Car Seat Project (MDC 1500-1642) |  | H, A, FD, (ALL) |  |  |  |
| 1040 |  | Lerado Initial Disclosures: Car Seat Production Agreement; Lerado Internal Invoices; Product Quality Specifications; Car Seat Photos; Emails re new buckles; Emails re crash testing bates, Invoices from Lerado to Baby Trend, Baby Trend Parts Agreement (Ler 110-136)                           |  | H, A, FD, (ALL) |  |  |  |
| 1041 |  | Certificate of Compliance for Toys "R" Us (Ler 160-161)  |  | H, A, FD, (ALL) |  |  |  |
| 1042 |  | Management Systems Certificates (Ler 162-166)  |  | H, A, FD, (ALL) |  |  |  |
| 1043 |  | Photos of sample car seat (Ler 167-170)  |  | FD              |  |  |  |
| 1044 |  | Calspan testing documents (Ler 171-217)  |  | FD, H           |  |  |  |
| 1045 |  | Internal testing documents (Ler 218-263)   |  | FD              |  |  |  |
| 1046 |  | Additional invoices to Baby Trend (Ler 264-268)  |  |                 |  |  |  |
| 1047 |  | Repeat: Parts MOQ Agreement (Ler 269-272)  |  |                 |  |  |  |
| 1048 |  | Injection Spreadsheet (Ler 273-278)  |  |                 |  |  |  |
| 1049 |  | Bill of Materials (Ler 279-290)  |  |                 |  |  |  |
| 1050 |  | Emails between Denny Tsai, Mark and others (Ler 291-302)   |  | FD, H           |  |  |  |
| 1051 |  | FMVSS 209: Seat Belt Assemblies (Chinni 3898)  |  |                 |  |  |  |
| 1052 |  | FMVSS 213: Child Restraint Systems (Chinni 3917)   |  |                 |  |  |  |

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| 1053 |  | ECE Regulation 44: Uniform Provisions Concerning the Approval of Restraining Devices for Child Occupants of Power Driven Vehicles (Chinni 3960) | FD, L           |  |  |  |
| 1054 |  | DOT HS 809 671, Misuse of Child Restraints, January 2004 (Chinni 4062)  | H, A, FD, (ALL) |  |  |  |
| 1055 |  | US Patent 4660889 Harness Web Adjuster with Child Restraint Seat, Filed 12/17/1985 (Chinni 3856)  | FD, H           |  |  |  |
| 1056 |  | US Patent 4679852 Remote Harness Web Adjuster, Filed 6/30/1986 (Chinni 3868)  | FD, H           |  |  |  |
| 1057 |  | Exemplar Baby Trend Flex-Loc CRS, Model Number CS31715, Mfg. 5/10/2013  | H, A, FD, (ALL) |  |  |  |
| 1058 |  | Exemplar F100152A A-Lok adjuster strap sample, manufactured Dec. 2013   | H, A, FD, (ALL) |  |  |  |
| 1059 |  | US Patent 5704684 Integrated Child Seat with Child Seat Belt Retractor, Filed 2/10/1995 (Chinni 3881)   | H, A, FD, (ALL) |  |  |  |
| 1060 |  | NHTSA Campaign 971001000, October 24, 1996 (Chinni 3782; 3828; 3830)  | H, A, FD, (ALL) |  |  |  |
| 1061 |  | NHTSA Campaign 98V185000, August 6, 1998 (Chinni)   | H, A, FD, (ALL) |  |  |  |
| 1062 |  | Figure 1 from 2/28/17 Expert Report of Jim Chinni: IMMI Fabrication Label, from 4/11/16 inspection  |                 |  |  |  |
| 1063 |  | Figure 2 from 2/28/17 Expert Report of Jim Chinni: IMMI Drawing from Exhibit 51 of J. King Deposition (Chinni)                                  |                 |  |  |  |
| 1064 |  | Figure 3 from 2/28/17 Expert Report of Jim Chinni: IMMI A-Lok Strap, from Exhibit 54 of J. King Deposition (Chinni)                             |                 |  |  |  |
| 1065 |  | Figure 4 from 2/28/17 Expert Report of Jim Chinni: Back Side of Seat, from Exhibit 11 of J. King Deposition (Chinni)                            |                 |  |  |  |
| 1066 |  | Figure 5 from 2/28/17 Expert Report of Jim Chinni: Visible Portion of Adjuster Strap, from Exhibit 11 (Chinni)                                  |                 |  |  |  |

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| 1067 |  | Figure 6 from 2/28/17 Expert Report of Jim Chinni: Illustration of Supply Chain for Subject CRS  |  | FD              |  |  |  |
| 1068 |  | Car Seat Inspection Video 1/18/17 (BT VanArsdell)  |  | H               |  |  |  |
| 1069 |  | Engineering Principles CRS Photographs, taken 2/10/17  |  | H, A, FD, (ALL) |  |  |  |
| 1070 |  | Statement of Deanna Ribeiro, taken 5/27/11   |  | FD              |  |  |  |
| 1071 |  | Statement of Francisco Ribeiro, taken 5/27/11  |  | H, A, FD, (ALL) |  |  |  |
| 1072 |  | Statement of Karen Lewandowski, taken 5/27/11  |  | H, A, FD, (ALL) |  |  |  |
| 1073 |  | Statement of Michael Lewandowski, taken 5/27/11  |  | H, A, FD, (ALL) |  |  |  |
| 1074 |  | Image from page 11 of 2/28/17 Expert Report of Will Van Arsdell: Carrier and base models available in 2006                                   |  | H, A, FD, (ALL) |  |  |  |
| 1075 |  | Image from page 18 of 2/28/17 Expert Report of Will Van Arsdell: Police photo 5/27/11  |  |                 |  |  |  |
| 1076 |  | Color photographs accompanying 2/28/17 Expert Report of Will Van Arsdell as Attachment 1: 22 images of various exemplar CRSs and chest clips |  | H, A, FD, (ALL) |  |  |  |
| 1077 |  | Exemplar CAMI dummy  |  | U, ALL          |  |  |  |
| 1078 |  | Photographs from Dr. Art Hoffmann's report   |  |                 |  |  |  |
| 1079 |  | US Patent: US 7040694 B2 94)   |  |                 |  |  |  |
| 1080 |  | US Patent: US 7004541 B2 (5)   |  |                 |  |  |  |
| 1081 |  | US Patent: US 6979057 B2 (6)   |  |                 |  |  |  |
| 1082 |  | US Patent: US 6916066 B2 (7)   |  |                 |  |  |  |
| 1083 |  | US Patent: US 6913313 B2 (8)   |  |                 |  |  |  |
| 1084 |  | US Patent: US 6834915 B2 (9)   |  |                 |  |  |  |
| 1085 |  | US Patent: US 6811216 B2 (10)  |  |                 |  |  |  |
| 1086 |  | Car seat photos (11)   |  |                 |  |  |  |
| 1087 |  | Flex-Loc infant car seat owner's manual (12)   |  |                 |  |  |  |

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| 1088 |  | Flex-Loc infant car seat owner's manual (13)   |  | FD              |  |  |  |
| 1089 |  | Flex-Loc infant car seat owner's manual (14)   |  | FD              |  |  |  |
| 1090 |  | Consultant Agreement May 2003 (15)   |  |                 |  |  |  |
| 1091 |  | Consultant Agreement March 2000 (16)   |  |                 |  |  |  |
| 1092 |  | MDC product development (17)   |  |                 |  |  |  |
| 1093 |  | Child restraint system test results Baby Trend (18)  |  | H, A, FD, (ALL) |  |  |  |
| 1094 |  | 2-piece snap together harness tie (20)   |  |                 |  |  |  |
| 1095 |  | "New" KH buckle email (21)   |  | H               |  |  |  |
| 1096 |  | Blow mold base email (22)  |  | H               |  |  |  |
| 1097 |  | HPP Latch-Loc samples (23)   |  | H               |  |  |  |
| 1098 |  | Revised buckle samples for crash-testing email (24)  |  | H               |  |  |  |
| 1099 |  | 2004 car seat detail (27)  |  | H               |  |  |  |
| 1100 |  | Car seat diagrams (28)   |  |                 |  |  |  |
| 1101 |  | Buckle photos (29)   |  |                 |  |  |  |
| 1102 |  | 06/07 catalog (30)   |  |                 |  |  |  |
| 1103 |  | Trendsport Traveler instruction manual (31)  |  |                 |  |  |  |
| 1104 |  | Travel system patent overview (32)   |  |                 |  |  |  |
| 1105 |  | Car seat features (33)   |  |                 |  |  |  |
| 1106 |  | Redesign of Latch-Loc and Flex-Loc infant seats to meet the requirements of FMVSS 213 which will become effective 8/01/05 (34) |  |                 |  |  |  |
| 1107 |  | BT crash-test matrix for 4-12/13-07 MGA (35)   |  | H, A, FD, (ALL) |  |  |  |
| 1108 |  | NHTSA final report 213-UST-06-48 (36)  |  | H, A, FD, (ALL) |  |  |  |
| 1109 |  | NHTSA report no. 213-NAWC-06-002 (37)  |  | H, A, FD, (ALL) |  |  |  |
| 1110 |  | Karen Triplett email (41)  |  | H, A, FD, (ALL) |  |  |  |
| 1111 |  | OPP car seat production agreement (43)   |  |                 |  |  |  |

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| 1112 |  | Trendsport Traveler instruction manual (49)                       |  |                       |  |  |  |
| 1113 |  | IMMI document production (51)                                     |  | H, A,<br>FD,<br>(ALL) |  |  |  |
| 1114 |  | Strap photos (54)   |  | H, A,<br>FD,<br>(ALL) |  |  |  |
| 1115 |  | IMMI control of records (55)                                      |  |                       |  |  |  |
| 1116 |  | Car seat photos (58)  |  |                       |  |  |  |
| 1117 |  | Residence photos (59)   |  |                       |  |  |  |
| 1118 |  | Baby Trend English owner's manual diagram (60A)                   |  | H, A,<br>FD,<br>(ALL) |  |  |  |
| 1119 |  | Warranty (60)   |  | H, A,<br>FD,<br>(ALL) |  |  |  |
| 1120 |  | Safe Kids child passenger safety checklist (61)                   |  |                       |  |  |  |
| 1121 |  | Parcel information (63)   |  | H, A,<br>FD,<br>(ALL) |  |  |  |
| 1122 |  | Floor plan (64)   |  |                       |  |  |  |
| 1123 |  | Google maps McDonald's (65)                                       |  |                       |  |  |  |
| 1124 |  | KPD records (67)  |  | H, A,<br>FD,<br>(ALL) |  |  |  |
| 1125 |  | Records of Good Samaritan Hospital (68)                           |  |                       |  |  |  |
| 1126 |  | Lucas history/physical 5/27/11 GSH (73)                           |  |                       |  |  |  |
| 1127 |  | Lucas outpatient report 5/27/11 (74)                              |  |                       |  |  |  |
| 1128 |  | Lucas discharge summary (75)                                      |  |                       |  |  |  |
| 1129 |  | Lucas physician's orders and progress notes 5/27/11 (76)          |  |                       |  |  |  |
| 1130 |  | Safe Kids Platte Valley subpoena response (77)                    |  | H, A,<br>FD,<br>(ALL) |  |  |  |
| 1131 |  | Child passenger safety checklist (78)                             |  | H, A,<br>FD,<br>(ALL) |  |  |  |
| 1132 |  | Child passenger safety checklist (79)                             |  |                       |  |  |  |
| 1133 |  | Handwritten notes by Dowling showing chain of custody (80)        |  |                       |  |  |  |
| 1134 |  | Photo of bates in exhibit 67 with Karen Lewandowski markings (81) |  |                       |  |  |  |

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|------|--|---|--|--------------------------|--|--|--|
| 1135 |  | Medical records (83)  |  | H, O-<br>Coll.<br>Source |  |  |  |
| 1136 |  | Medical records (84)  |  | H, O-<br>Coll.<br>Source |  |  |  |
| 1137 |  | Medical records (85)  |  | H, O-<br>Coll.<br>Source |  |  |  |
| 1138 |  | Medical bills 86A disk of bills – retained by M. Coyle (86; 86A)  |  | H, O-<br>Coll.<br>Source |  |  |  |
| 1139 |  | CH & CSP 000001-011793 (88)                                       |  | H, O-<br>Coll.<br>Source |  |  |  |
| 1140 |  | Call log Baby Trend (90)  |  | H, A,<br>FD,<br>(ALL)    |  |  |  |
| 1141 |  | Child restraint registration (91)                                 |  |                          |  |  |  |
| 1142 |  | Car seat photos (96)  |  |                          |  |  |  |
| 1143 |  | Product quality specification (98)                                |  |                          |  |  |  |
| 1144 |  | Lerado proforma invoice (99)                                      |  |                          |  |  |  |
| 1145 |  | F007 OPP car seat issues and follow-up working sheet (100)        |  |                          |  |  |  |
| 1146 |  | Certificate of compliance for Toys "R" Us Corporation – USA (101) |  | H, A,<br>FD,<br>(ALL)    |  |  |  |
| 1147 |  | Test standard report (102)  |  |                          |  |  |  |
| 1148 |  | Car seat photos (103)   |  |                          |  |  |  |
| 1149 |  | Parts IMOQ agreement (104)  |  |                          |  |  |  |
| 1150 |  | Parts (105)   |  |                          |  |  |  |
| 1151 |  | Parts (106)   |  |                          |  |  |  |
| 1152 |  | Patent chart (107)  |  |                          |  |  |  |
| 1153 |  | Test samples/photos/report (108)                                  |  |                          |  |  |  |
| 1154 |  | Baby Trend purchase order (109)                                   |  |                          |  |  |  |
| 1155 |  | Flex-Loc infant car seat owner's manual (114)                     |  |                          |  |  |  |
| 1156 |  | Baby Trend call logs starting in 2000 (116)                       |  | FD, H                    |  |  |  |
| 1157 |  | Collection of emails sent or received by Tsai (117)               |  | H                        |  |  |  |

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|------|--|---|-----------------|--|--|--|
| 1158 |  | Plaintiffs' response to request for production of documents attached to deposition notice for Arthur Hoffmann, P.E. (120) | H, A, FD, (ALL) |  |  |  |
| 1159 |  | CV Arthur Hoffmann (121)  |                 |  |  |  |
| 1160 |  | Van Arsdell report, CV, testimony list and associated items (177)   | H, A, FD, (ALL) |  |  |  |
| 1161 |  | Van Arsdell file materials; Exponent Surrogate Photos taken 2/17/17 (178)   | H, A, FD, (ALL) |  |  |  |
| 1162 |  | Chinni document production (Chinni_0001 – Chinni_4231; 186)   | H, A, FD, (ALL) |  |  |  |
| 1163 |  | Car seat photos (Chinni_003851 – Chinni_3853; 188)  | H, A, FD, (ALL) |  |  |  |
| 1164 |  | Ribeiro inspection report (Chinni_03854 – Chinni_3855; 189)   | H, A, FD, (ALL) |  |  |  |
| 1165 |  | IMMI product description sheets A38042A, A38171A (Chinni_4228 – Chinni_4229; 190)   | H, A, FD, (ALL) |  |  |  |
| 1166 |  | IMMI product description sheets F14193, F100152A (Chinni_3756 – Chinni_3757; 191)   | H, A, FD, (ALL) |  |  |  |
| 1167 |  | Ribeiro exemplar photos (Prange3047-Prange3059; 193)  | H, A, FD, (ALL) |  |  |  |
| 1168 |  | Ribeiro surrogate photos (Prange3082-Prange3109; 194)   | H, A, FD, (ALL) |  |  |  |
| 1169 |  | Case Summary Michael T Prange, Ph.D., P.E. (Prange0041-Prange0082; 195))  | H, A, FD, (ALL) |  |  |  |
| 1170 |  | Humanetics CAMI 6 Month Old Dummy "Mark II" (Prange5079; 196)   | H, A, FD, (ALL) |  |  |  |
| 1171 |  | Ribeiro Exemplar III photos (Prange5152-Prange5153; 197)  | H, A, FD, (ALL) |  |  |  |
| 1172 |  | Ribeiro Exemplar II photos (Prange3060-Prange3081; 198)   | H, A, FD, (ALL) |  |  |  |
| 1173 |  | OPP car seat production agreement (5)   |                 |  |  |  |
| 1174 |  | OPP car seat production agreement (1)   |                 |  |  |  |

|      |  |  |  |                 |  |  |  |
|------|--|--|--|-----------------|--|--|--|
| 1175 |  | Baby Trend OPP car seat mold test (3)  |  | H, A, FD, (ALL) |  |  |  |
| 1176 |  | SGS invoice and test report (4)  |  | H, A, FD, (ALL) |  |  |  |
| 1177 |  | Open issues on OPP car seat 4/26/04 (5)  |  | FD, H           |  |  |  |
| 1178 |  | Webbing latch adjuster bar stamping (6)  |  | FD, H           |  |  |  |
| 1179 |  | Email from Sedlack to Tsai re OPP 3D data 11/24/03 (7)   |  | FD, H           |  |  |  |
| 1180 |  | Email from Sedlack to Lerado re changes and corrections 8/02/05 (8)  |  | FD, H           |  |  |  |
| 1181 |  | Plaintiffs' Response to Request for Production: Children's Specialty Physicians, Children's Memorial Hospital, Rehab Specialists, American Medical Response, Great Plains Radiology, Total Respiratory Rehab, Family Physical Therapy, Baby Trend Manuals, Photos, Safe Kids, Good Samaritan Hospital, Children's Medical Hospital, Letter to Kearney Police Chief (Various by Provider) |  | H, A, FD, (ALL) |  |  |  |
| 1182 |  | Plaintiffs' Supplemental Response to Request for Production: NPPI, Hanger; Rehab Specialists, Childrens Hospital, Apria Healthcare, Kids on the Move, Family Physical Therapy, Kearney Clinic, Craig Home Care, Total Respiratory Rehab, ENT Specialists, Elkhorn Public Schools, Medical Bills, Kearney Public Schools, Millard Public Schools (Various by Provider)                    |  | H, A, FD, (ALL) |  |  |  |
| 1183 |  | Plaintiffs' 2 <sup>nd</sup> Supplemental Response to Request for Production: OrthoMedics, Walgreens, Rizal, Childrens Hospital (Various by Provider)   |  | H, A, FD, (ALL) |  |  |  |

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| 1184 |  | Plaintiffs' 3 <sup>rd</sup> Supplemental Response to Request for Production: Medical Bills, OrthoMedics, Rizal, Craig HomeCare, Maxim Healthcare, Childrens Hospital, Total Respiratory and Rehab (Various by Provider) |  | H, A, FD, (ALL) |  |  |  |
| 1185 |  | Plaintiffs' 4 <sup>th</sup> Supplemental Response to Request for Production: Elkhorn Public Schools (Elkhorn Public Schools 020-038)  |  | H, A, FD, (ALL) |  |  |  |
| 1186 |  | Plaintiffs' 4 <sup>th</sup> Supplemental Response to Request for Production dated 2/24/17: Munroe Meyer Institute (Munroe Meyer 001-1072)   |  | H, A, FD, (ALL) |  |  |  |
| 1187 |  | PL Kearney Clinic Medical Records (KC001-209)   |  | H, A, FD, (ALL) |  |  |  |
| 1188 |  | PL Total Respiratory and Rehab Bills (Bills 001-315)  |  | H, A, FD, (ALL) |  |  |  |
| 1189 |  | PL Madonna Rehabilitation Hospital (Madonna 0001-0061)  |  | H, A, FD, (ALL) |  |  |  |
| 1190 |  | PL 6 <sup>th</sup> Supplemental Response to Request for Production Children's Home Healthcare invoice 3-2017 (Children's Home Healthcare Bill for March 2017 001-002)   |  | H, A, FD, (ALL) |  |  |  |
| 1191 |  | Plaintiffs' 5 <sup>th</sup> Supplemental Response to Request for Production: Children's Home Healthcare, Childrens Specialty Physicians, Maxim Healthcare, Children's Hospital (Various by Provider)                    |  | H, A, FD, (ALL) |  |  |  |

|      |  |   |  |                 |  |  |  |
|------|--|---|--|-----------------|--|--|--|
| 1192 |  | BT subpoenaed records: KPD videos, photos, 911 call, incident report, Ribeiro interview, evidence tracking, CAD call, audios, American Medical Response Patient Care, Children's Hospital Radiology, Children's Hospital, Children's Specialty Physicians, Family Physical Therapy, Good Samaritan Hospital, Great Plains Radiology, Kearney Clinic, Madonna Rehabilitation Hospital, Rehabilitation Specialists, Total Respiratory and Rehab (Various by Provider) |  | H, A, FD, (ALL) |  |  |  |
| 1193 |  | BT Children's Home Healthcare (CHH 001-225)   |  | H, A, FD, (ALL) |  |  |  |
| 1194 |  | BT Children's Respite Care Center (CRCC 1-141)  |  | H, A, FD, (ALL) |  |  |  |
| 1195 |  | BT Craig Home Care (CHC001-205)   |  | H, A, FD, (ALL) |  |  |  |
| 1196 |  | BT Coram (Coram1-10)  |  | H, A, FD, (ALL) |  |  |  |
| 1197 |  | BT Coram Omaha (Coram Omaha 1-173)  |  | H, A, FD, (ALL) |  |  |  |
| 1198 |  | BT Hangar Orthotics (Hanger 001-031)  |  | H, A, FD, (ALL) |  |  |  |
| 1199 |  | Maxim Healthcare Services (MHC1-746)  |  | H, A, FD, (ALL) |  |  |  |
| 1200 |  | BT Omaha Public Schools (Omaha Public Schools1-351)   |  | H, A, FD, (ALL) |  |  |  |
| 1201 |  | Demonstrative exhibits as necessary   |  | H, A, FD, (ALL) |  |  |  |
| 1202 |  | Impeachment exhibits as necessary   |  | H, A, FD, (ALL) |  |  |  |

**OBJECTIONS**

**R: Relevancy**

**H: Hearsay**

**A: Authenticity**

**O: Other (specify)**

**FD: Foundation**

**U: Unavailable for inspection (all objections reserved)**

**ALL: All objections reserved**



|      |  |   |  |                     |  |  |
|------|--|---|--|---------------------|--|--|
|      |  | 0160-0161) (Roger Hsu Depo. Ex. 101)  |  | ALL                 |  |  |
| 2016 |  | Test Standard Report (Lerado 0218-0243) (Roger Hsu Depo. Ex. 102)   |  |                     |  |  |
| 2017 |  | Lerado Parts MOQ Agreement Between Baby Trend and Lerado dated March 22, 2007 (Lerado 0269-0272) (Roger Hsu Deposition Exhibit 104)   |  |                     |  |  |
| 2018 |  | Bill of Materials (Lerado 0279-0290) (Roger Hsu Depo. Ex. 106)  |  |                     |  |  |
| 2019 |  | Kendrion Control Instruction for Dual Tongue Infant Buckle dated 6/10/02 (Roger Hsu Depo. Ex. 108, pp. 10-13)   |  |                     |  |  |
| 2020 |  | Baby Trend Purchase Order No. LD-632R2 dated 2/11/04 (Roger Hsu Depo. Ex. 109)  |  |                     |  |  |
| 2021 |  | Mark Sedlack Email String with (3) photo attachments RE: Status of Changes and Corrections dated July/August 2005 (BT Doc Prod. 10114-10115; 10117)                             |  | A,<br>FD,<br>H      |  |  |
| 2022 |  | U.S. Patent 7,040,694 dated 5/9/06 (Mark Sedlack Depo. Ex. 4)   |  | FD,<br>H            |  |  |
| 2023 |  | U.S. Patent 7,004,541 dated 2/28/06 (Mark Sedlack Depo. Ex. 5)  |  | FD,<br>H            |  |  |
| 2024 |  | U.S. Patent 6,979,057 dated 12/27/05 (Mark Sedlack Depo. Ex. 6)   |  | FD,<br>H            |  |  |
| 2025 |  | U.S. Patent 6,916,066 dated 7/12/05 (Mark Sedlack Depo. Ex. 7)  |  | FD,<br>H            |  |  |
| 2026 |  | U.S. Patent 6,913,313 dated 7/5/05 (Mark Sedlack Depo. Ex. 8)   |  | FD,<br>H            |  |  |
| 2027 |  | Baby Trend Flex-Loc Infant Car Seat Owner's Manual (Mark Sedlack Depo. Exhibit 14)  |  | FD                  |  |  |
| 2028 |  | Consult Agreement Executed May 2003 Between Millenium Development Corp. (Mark Sedlack) and Baby Trend (Mark Sedlack Depo. Ex. 15)   |  |                     |  |  |
| 2029 |  | Consult Agreement With Survival Provision Executed in 2000 Between Millenium Development Corp. (Mark Sedlack) and Baby Trend (Mark Sedlack Depo. Ex. 16)                        |  |                     |  |  |
| 2030 |  | Millenium Development Corporation's Infant Car Seat Estimated Schedule (Mark Sedlack Depo. Ex. 17)  |  |                     |  |  |
| 2031 |  | Sedlack File Materials (MDC00741-00780) (Mark Sedlack Depo. Ex. 18)   |  | H, A,<br>FD,<br>ALL |  |  |
| 2032 |  | Email String RE: New KH Buckle between Mark Sedlack, George Lin, and Jason W. dated November 2005 (Mark Sedlack Depo. Ex. 21)   |  | H, A,<br>FD,<br>ALL |  |  |
| 2033 |  | Email String RE: Blow Mold Base between Mark Sedlack, Baby Trend and Lerado dated September 2005 (Mark Sedlack Depo. Ex. 22)  |  | H, A,<br>FD,<br>ALL |  |  |
| 2034 |  | Email String RE: HPP Latch - Loc Samples between Mark Sedlack, Baby Trend and Lerado dated October 2005 (Mark Sedlack Depo. Ex. 23)   |  | H, A,<br>FD,<br>ALL |  |  |
| 2035 |  | Email String RE: Revised Buckle Samples for Crash Testing between Mark Sedlack, Global Products, Baby Trend and Lerado dated September/October 2005 (Mark Sedlack Depo. Ex. 24) |  | H, A,<br>FD,<br>ALL |  |  |
| 2036 |  | 2004 Car Seat Detail (Mark Sedlack Depo. Ex. 27)  |  | H                   |  |  |
| 2037 |  | Baby Trend Trendsport Traveler Laurel Oak Instruction Manual (Mark Sedlack Depo. Ex. 31)  |  | FD                  |  |  |
| 2038 |  | Child Restraint System Component Tests Prepared for U.S. Department of Transportation - Final Report dated June 2, 2006 (Mark Sedlack Depo. Ex. 36)                             |  | H, A,<br>FD,<br>ALL |  |  |
| 2039 |  | Child Restraint System Tests Prepared for U.S. Department of Transportation - Final Report dated July 24, 2006 (Mark Sedlack Depo. Ex. 37)                                      |  | H, A,<br>FD,<br>ALL |  |  |

|      |  |   |  |                     |  |  |  |
|------|--|---|--|---------------------|--|--|--|
| 2040 |  | ER Outpatient Discharge Summary Report for Lucas Ribeiro dated 5/27/11 (Katherine Keifer Depo. Ex. 75)  |  | FD,<br>H            |  |  |  |
| 2041 |  | Physician's Orders and Progress Notes from Good Samaritan Hospital dated 5/27/11 (Katherine Keifer Depo. Ex. 76)  |  | FD,<br>H            |  |  |  |
| 2042 |  | Responsive Documents from Safe Kids Per Subpoena (Safe Kids Sub. Resp. 1-58) (Jamic Cummings Depo. Ex. 77)  |  | H, A,<br>FD,<br>ALL |  |  |  |
| 2043 |  | Child Passenger Safety Checklist Form (Jamic Cummings Depo. Ex. 78)   |  | H, A,<br>FD,<br>ALL |  |  |  |
| 2044 |  | Child Passenger Safety Checklist (Executed) dated 9/18/10 (Karen Triplett Depo. Ex. 79)   |  |                     |  |  |  |
| 2045 |  | Customer Call Log (Betty Tsai Depo. Ex. 90)   |  | H                   |  |  |  |
| 2046 |  | Child Restraint Registration Card (Betty Tsai Depo. Ex. 91)   |  |                     |  |  |  |
| 2047 |  | Collection of E-mails Sent and/or Received by Denny Tsai (Lerado 0061-0062; 0065-0070) (Denny Tsai Depo. Ex. 117 Excerpts)  |  | FD,<br>H            |  |  |  |
| 2048 |  | Standard Consumer Safety Specification for Hand-Held Infant Carriers – ASTM International F2050-03  |  | FD,<br>H            |  |  |  |
| 2049 |  | Rib Profile Diagrams (BT Doc. Prod. 10018-10019)  |  | FD,<br>H            |  |  |  |
| 2050 |  | Latch Strap Routing Diagrams (BT Doc. Prod. 10051 & 10056)  |  | FD,<br>H            |  |  |  |
| 2051 |  | Invoices for Buckles from Lerado Defendants' Initial Disclosures (Lerado 0003-0005)   |  | H, A,<br>FD,<br>ALL |  |  |  |
| 2052 |  | Preliminary Quotation For Buckle From Global Products, Inc. (MDC00765-00766) (Exhibit D to Lerado's Motion for Summary Judgment)  |  | H                   |  |  |  |
| 2053 |  | Lerado Defendants' Supplemental Responses to Plaintiffs' First Set of Requests for Production of Documents dated January 20, 2017 (Exhibit U to Lerado's Motion for Summary Judgment) |  | FD,<br>H            |  |  |  |
| 2054 |  | (8) Photographs of Warning Labels (Exhibit W to Lerado's Motion for Summary Judgment)   |  |                     |  |  |  |
| 2055 |  | Photograph of Car Seat From the Kearney Police Department File (KPD Sub Recs 70) (Exhibit Y to Lerado's Motion for Summary Judgment)  |  |                     |  |  |  |
| 2056 |  | Mold Cavity Diagram (BT Doc. Prod. 10146)   |  |                     |  |  |  |
| 2057 |  | Customer Statistic Information (Bo Isacson Depo. Ex. 3)   |  | H, A,<br>FD,<br>ALL |  |  |  |
| 2058 |  | Michael Prange's Final Expert Report dated 2/28/17 (Prange 0008-0040)   |  | H, A,<br>FD,<br>ALL |  |  |  |
| 2059 |  | Michael Prange's Supplemental Expert Report dated 3/30/17 (*Note: also marked as Ted Sokol Depo. Ex. 203)   |  | H, A,<br>FD,<br>ALL |  |  |  |
| 2060 |  | Michael Prange Depo. Exhibit 193 – (50) Car Seat Exemplar Photographs (Prange 3047-3059)  |  | H, A,<br>FD,<br>ALL |  |  |  |
| 2061 |  | Michael Prange Depo. Exhibit 196 – CAMI Dummy Specifications (Prange 5079)  |  | H, A,<br>FD,<br>ALL |  |  |  |
| 2062 |  | Michael Prange Depo. Ex. 197 – (7) Exemplar III Photographs of CAMI Dummy (Prange 5152-5153)  |  | H, A,<br>FD,<br>ALL |  |  |  |
| 2063 |  | Michael Prange Depo. Exhibit 198 – (87) Exemplar II Photographs of CAMI Dummy in Car Seat (Prange 3060-3081)  |  | H, A,<br>FD,<br>ALL |  |  |  |
| 2064 |  | Curriculum Vitae of Michael Prange  |  | H                   |  |  |  |
| 2065 |  | Video of April 6, 2016 Car Seat Inspection  |  | FD,<br>H            |  |  |  |

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| 2066 |  | Video of January 18, 2017 Car Seat Inspection   |  | FD,<br>H            |  |  |  |
| 2067 |  | Curriculum Vitae of William Van Arsdell (Van Arsdell Depo. Ex. 177)   |  | H                   |  |  |  |
| 2068 |  | William Van Arsdell File Materials – including Surrogate Photos and Car Seat Exemplars - Baby Trend Flex-Loc 6311, Evenflo Cozy Carry 4771273P1, Evenflo Discovery 30211188, Peg Perego Auto Primo Viaggio 4040081, Britax Companion F912063, Graco SnugRide 7350D0H, and Safety 1 <sup>st</sup> Designer 22 DE2B001289 (Van Arsdell Depo. Ex. 178) (*Note: Surrogate photos also marked as Prange Depo. Ex. 194, Prange 3082-3109) |  | H, A,<br>FD,<br>ALL |  |  |  |
| 2069 |  | William Van Arsdell's Supplemental Expert Report dated 3/30/17  |  | H, A,<br>FD,<br>ALL |  |  |  |
| 2070 |  | Christine Wood's (Exponent) Final Expert Report dated 2/28/17   |  | H, A,<br>FD,<br>ALL |  |  |  |
| 2071 |  | Curriculum Vitae of Christine Wood (Exponent)   |  | H, A,<br>FD,<br>ALL |  |  |  |
| 2072 |  | Christine Wood's Car Seat Inspection Photographs dated 1/18/17 (Wood Inspection 001-027)  |  | H, A,<br>FD,<br>ALL |  |  |  |
| 2073 |  | Richard Katz's Final Expert Report dated 2/27/17  |  | H, A,<br>FD,<br>ALL |  |  |  |
| 2074 |  | Curriculum Vitae of Richard Katz  |  | H, A,<br>FD,<br>ALL |  |  |  |
| 2075 |  | Depo. Transcript Video Matthew (Chip) Whalen  |  | FD,<br>H,<br>ALL    |  |  |  |
| 2076 |  | Depo. Transcript Video Jamie Cummings   |  | FD,<br>H,<br>ALL    |  |  |  |
| 2077 |  | Depo. Transcript Video Roger Hsu  |  | FD,<br>H,<br>ALL    |  |  |  |
| 2078 |  | Depo. Transcript Video Mark Sedlack   |  | FD,<br>H,<br>ALL    |  |  |  |
| 2079 |  | Depo. Transcript Video Jacqueline Liess   |  | FD,<br>H,<br>ALL    |  |  |  |
| 2080 |  | Depo. Transcript Video Luke Cheng   |  | FD,<br>H,<br>ALL    |  |  |  |
| 2081 |  | Depo. Transcript Video Denny Tsai   |  | FD,<br>H,<br>ALL    |  |  |  |
| 2082 |  | Depo. Transcript Video Brad Mattarocci  |  | FD,<br>H,<br>ALL    |  |  |  |
| 2083 |  | Depo. Transcript Video Bo Isacson   |  | FD,<br>H,<br>ALL    |  |  |  |
| 2084 |  | Depo. Transcript Video Betty Tsai   |  | FD,<br>H,<br>ALL    |  |  |  |
| 2085 |  | Depo. Transcript Video Dr. Katherine Keifer   |  | FD,<br>H,<br>ALL    |  |  |  |
| 2086 |  | Depo. Transcript Video Michael Young  |  | FD,<br>H,<br>ALL    |  |  |  |
| 2087 |  | Depo. Transcript Video Melody Gough   |  | FD,<br>H,<br>ALL    |  |  |  |
| 2088 |  | Depo. Transcript Video Joshua Salter  |  | FD,<br>H,<br>ALL    |  |  |  |
| 2089 |  | Depo. Transcript Video David Sesna  |  | FD,<br>H,           |  |  |  |

|  |  |  |   |                            |  |  |  |
|--|--|--|---|----------------------------|--|--|--|
|  |  |  |   | ALL                        |  |  |  |
|  |  |  | By identifying exhibits, Defendant does not stipulate to their admissibility, nor do we stipulate to authenticity of any exhibits we object to.   |                            |  |  |  |
|  |  |  | Many exhibits have been identified because of their possible relevance for impeachment and or rebuttal purposes and Defendant expressly reserves the right to withdraw exhibits depending on the Court's rulings on motions <i>in limine</i> and other pre-trial motions as well as Plaintiffs' actual proofs at trial and by identifying exhibits Defendant does not waive any of its arguments regarding any pending motions or evidentiary disputes. |                            |  |  |  |
|  |  |  | All exhibits submitted with Pleadings, Motions and Memoranda in this case.  | A,<br>FD,<br>H. U.,<br>ALL |  |  |  |
|  |  |  | Rebuttal and Impeachment exhibits.  | A,<br>FD,<br>H. U.,<br>ALL |  |  |  |
|  |  |  | Any and all exhibits listed, used, or referred to by Plaintiffs or Co-Defendants at trial.  |                            |  |  |  |
|  |  |  | Defendant reserves the right to supplement their exhibit list with demonstrative exhibits, as necessary.  |                            |  |  |  |

|  |  |  |   |  |  |  |  |  |
|--|--|--|---|--|--|--|--|--|
|  |  |  | Defendant reserves the right to amend their exhibit list as necessary based on documents not yet received but produced in ongoing discovery or depositions or pursuant to subpoena. |  |  |  |  |  |
|--|--|--|---|--|--|--|--|--|

**OBJECTIONS**

- R: Relevancy**
- H: Hearsay**
- A: Authenticity**
- O: Other (specify)**
- FD: Foundation**
- U: Unavailable for inspection (all objections reserved)**
- All: All objections reserved**

DATED this 17th day of April, 2017.

Respectfully submitted,

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 LIMITED, MAXI MILIAAN B.V., and DOREL  
 INDUSTRIES, INC.

## PROOF OF SERVICE

The undersigned certifies that the foregoing instrument was served upon all counsel of record, via e-mail, on April 17, 2017.

/s/ Jeff W. Wright

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**Attorneys for Indiana Mills &  
Manufacturing Inc.**

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEBRASKA

FRANCO RIBEIRO and DEANNA RIBEIRO, )  
as individuals and as next friends and )  
biological parents of LUCAS RIBEIRO, an )  
infant, )

Case No. 8:12-cv-00204

Plaintiffs, )

**PLAINTIFFS' AMENDED  
WITNESS LIST**

vs. )

BABY TREND, INC., et al. )

Defendants. )

COME NOW Plaintiffs, Franco Ribeiro and Deanna Ribeiro, by and through their counsel, and hereby submit the following amended witness list, subject to call:

| <u>No.</u> | <u>Witness</u>        | <u>Address/Phone</u>   | <u>Status</u>            |
|------------|-----------------------|--|--------------------------|
| (1)        | Abdallah, Elias       | 1202 Ave. K.<br>Kearney, NE 68847  | May Call<br>(deposition) |
| (2)        | Abdallah, Tara        | 1202 Ave. K.<br>Kearney, NE 68847  | Will Call                |
| (3)        | Allison, Kathie       | 6415 Washington Street<br>Kansas City, MO 64113  | Will Call                |
| (4)        | Anderson, Ofc. Joseph | Kearney Police Dept.<br>2025 A Avenue<br>Kearney, NE 68847<br>(308) 237-2104                     | May Call                 |
| (5)        | Beethe, Ryan          | Maxim Healthcare Services<br>9239 West Center Rd Suite 100<br>Omaha, NE 68124<br>(402) 399-8888  | May Call                 |
| (6)        | Bell, Jill            | Children's Hospital & Medical Center<br>8200 West Dodge St.<br>Omaha, NE 68114<br>(308) 865-7100 | Will Call                |
| (7)        | Blum, Heidi           | Hillrise Elementary<br>20110 Hopper Street<br>Elkhorn, NE 68022<br>(402) 289-2602                | Will Call                |
| (8)        | Boswell, Patricia     | Kearney, NE  | May Call                 |
| (9)        | Byrne, Ofc. Dennis G. | Kearney Police Dept.<br>2025 A Avenue<br>Kearney, NE 68847<br>(308) 237-2104                     | May Call                 |

|      |                          |  |                           |
|------|--------------------------|--|---------------------------|
| (10) | Byum, Matt               | Indiana Mills & Manufacturing, Inc.<br>18881 IMMI Way<br>Westfield, IN 46074<br>(317) 896-9531   | May Call                  |
| (11) | Castle, Megan            | Craig Home Care<br>220 N. 89th Street, Suite 103<br>Omaha, NE 68114<br>(402) 502-5750  | May Call                  |
| (12) | Caswell, Mary            | Children's Hospital & Medical Center<br>8200 West Dodge St.<br>Omaha, NE 68114<br>(308) 865-7100   | May Call                  |
| (13) | Cheng, Kuang-Neng "Luke" | Lerado<br>No. 202, Rd Caixing, Dongshen,<br>Zhonshan city, Guangdong Province<br>Zhongshan Guangdong 528414 China,<br>86-760-13416037746 | Will Call<br>(deposition) |
| (14) | Chinni, James            | 842 Dorchester Drive<br>Noblesville, IN 46062  | Will Call<br>(deposition) |
| (15) | Cummings, Jamie          | SafeKids Platte Valley<br>Good Samaritan Health Services<br>1755 Prairie View Place<br>Kearney NE 68845                                  | Will Call<br>(deposition) |
| (16) | Dowling, Ofc. Jeffrey    | Kearney Police Dept.<br>2025 A Avenue<br>Kearney, NE 68847<br>(308) 237-2104   | May Call<br>(deposition)  |
| (17) | Gardner, Rob             | 2919 Canton Street<br>Dallas, TX 75226<br>(214) 761-1809   | May Call                  |
| (18) | Goebel, Debora, M.D.     | ENT Specialists PC<br>720 North 129th Street<br>Omaha, NE 68154  | May Call                  |
| (19) | Gough, David             | 50 Plaza Blvd., Apt. 36<br>Kearney, NE 68845   | May Call                  |
| (20) | Gough, Melody            | 50 Plaza Blvd., Apt. 36<br>Kearney, NE 68845   | Will Call                 |
| (21) | Graf, Joseph             | CHI Health Good Samaritan Hospital<br>10 E. 31st Street<br>Kearney NE 68848<br>(308) 865-7100  | May Call<br>(deposition)  |
| (22) | Haney, Suzanne, M.D.     | Children's Hospital & Medical Center<br>8200 West Dodge St.<br>Omaha, NE 68114<br>(308) 865-7100   | Will Call                 |
| (23) | Hanks, Jacqueline        | Children's Hospital & Medical Center<br>8200 West Dodge St.<br>Omaha, NE 68114   | May Call                  |

|      |                                |  |                           |
|------|--------------------------------|--|---------------------------|
|      |                                | (308) 865-7100   |                           |
| (24) | Hansen, Susan L.               | Maxim Healthcare Services<br>9239 West Center Rd Suite 100<br>Omaha, NE 68124<br>(402) 399-8888  | Will Call                 |
| (25) | Herstein, Kelli R., Ph.D.      | 11222 Jefferson Street<br>Omaha, NE 68137  | Will Call                 |
| (26) | Hill, Ofc. Dennis              | Kearney Police Dept.<br>2025 A Avenue<br>Kearney, NE 68847<br>(308) 237-2104   | May Call<br>(deposition)  |
| (27) | Hoffmann, Arthur W., Ph.D.     | 887 Wind Drift Drive<br>Traverse City, Michigan 49684  | Will Call                 |
| (28) | Hsu, Roger                     | Lerado<br>No. 202, Rd Caixing, Dongshen,<br>Zhonshan city, Guangdong Province<br>Zhongshan Guangdong 528414 China,<br>86-760-13416037746 | Will Call<br>(deposition) |
| (29) | Isacson, Bo                    | Gnotec/Holmbergs<br>Stationsgatan 30,<br>302 45 Halmstad, Sweden   | May Call<br>(deposition)  |
| (30) | Jarmin, Christopher            | Buffalo County Sheriff's Office<br>2025 Avenue A<br>Kearney, NE 68847<br>(308) 263-8555  | May Call<br>(deposition)  |
| (31) | Jordan, Ashley                 | Baby Trend, Inc.<br>1607 S. Campus Ave.<br>Ontario, CA 91761<br>909-773-0018   | May Call                  |
| (32) | Joshi, Prashant, M.D.          | Texas Tech University HSC<br>4800 Alberta Ave.<br>El Paso, TX 79912  | Will Call                 |
| (33) | Kafka, Adam, M.D.              | Madonna Rehabilitation Hospital<br>5401 South St.<br>Lincoln, NE 68506<br>(402) 413-3000   | May Call                  |
| (34) | Kaler, Dave                    | Indiana Mills & Manufacturing, Inc.<br>18881 IMMI Way<br>Westfield, IN 46074<br>(317) 896-9531   | May Call                  |
| (35) | Keifer, Katherine, M.D.        | Kearney Clinic, P.C.<br>211 W. 33rd Street<br>Kearney, NE 68845<br>(308) 865-2141  | Will Call<br>(deposition) |
| (36) | King, Julia                    | Indiana Mills & Manufacturing, Inc.<br>18881 IMMI Way<br>Westfield, IN 46074<br>(317) 896-9531   | Will Call<br>(deposition) |
| (37) | Kratochvil-Stava, Angela, M.D. | Kearney Clinic, P.C.   | Will Call                 |

|      |                       |   |                           |
|------|-----------------------|---|---------------------------|
|      |                       | 211 W. 33rd Street<br>Kearney, NE 68845<br>(308) 865-2141   | (deposition)              |
| (38) | Krueger, Kurt, Ph.D.  | John Ward Economics<br>8340 Mission Road, Ste. #235<br>Prairie Village, KS 66206  | May Call                  |
| (39) | Larsson, Matz         | Holmbergs Hong Kong<br>Flat A2, Block A, 22/F<br>Hong Nam Ind. Bldg.<br>603 Castle Peak Road<br>Tsuenwan, N.T. Hong Kong CHINA      | May Call                  |
| (40) | Lerner, Gary, M.D.    | Children's Hospital & Medical Center<br>Children's Developmental Clinic<br>8200 West Dodge St.<br>Omaha, NE 68114<br>(308) 865-7100 | Will Call                 |
| (41) | Lewandowski, Karen S. | 411 E. 32nd Street<br>Kearney, NE 68847   | May Call<br>(deposition)  |
| (42) | Lewandowski, Michael  | 411 E. 32nd Street<br>Kearney, NE 68847   | May Call<br>(deposition)  |
| (43) | Lewis, Betty          | Buffalo County Jail<br>1512 Central Ave.<br>Kearney, NE 68847<br>(308) 233-5281   | May Call<br>(deposition)  |
| (44) | Lewis, Ofc. Rob       | Kearney Police Dept.<br>2025 A Avenue<br>Kearney, NE 68847<br>(308) 237-2104  | May Call                  |
| (45) | Liess, Jacqueline     | SafeKids Platte Valley<br>Good Samaritan Health Services<br>1755 Prairie View Place<br>Kearney NE 68845                             | Will Call<br>(deposition) |
| (46) | Mattarocci, Brad      | Baby Trend, Inc.<br>1607 S. Campus Ave.<br>Ontario, CA 91761<br>909-773-0018  | Will Call                 |
| (47) | Maendele, Bill        | CHI Health Good Samaritan Hospital<br>10 E. 31st Street<br>Kearney NE 68848<br>(308) 865-7100                                       | May Call<br>(deposition)  |
| (48) | Murray, Dawn, M.D.    | Kearney Clinic, P.C.<br>211 W. 33rd Street<br>Kearney, NE 68845<br>(308) 865-2141   | Will Call<br>(deposition) |
| (49) | Oliver, Young, M.D.   | Children's Hospital & Medical Center<br>8200 West Dodge St.<br>Omaha, NE 68114  | May Call                  |

|      |                         |   |                           |
|------|-------------------------|---|---------------------------|
|      |                         | (308) 865-7100  |                           |
| (50) | Pavkovic, Ivan, M.D.    | Children's Hospital & Medical Center<br>8200 West Dodge St.<br>Omaha, NE 68114<br>(308) 865-7100        | May Call                  |
| (51) | Quinlan, Trent, M.D.    | ENT Specialists PC<br>720 North 129th Street<br>Omaha, NE 68154<br>(402) 397-0670                       | May Call                  |
| (52) | Ribeiro, Alex           | 3206 N. 202 <sup>nd</sup> Street<br>Elkhorn, NE 68022   | Will Call                 |
| (53) | Ribeiro, Deanna         | 3206 N. 202 <sup>nd</sup> Street<br>Elkhorn, NE 68022   | Will Call                 |
| (54) | Ribeiro, Fransisco      | 3206 N. 202 <sup>nd</sup> Street<br>Elkhorn, NE 68022   | Will Call                 |
| (55) | Ribeiro, Lucas          | 3206 N. 202 <sup>nd</sup> Street<br>Elkhorn, NE 68022   | Will Call                 |
| (56) | Rizal, Chandrika, M.D.  | Children's Physicians<br>Mission Village<br>16909 Q Street<br>Omaha NE 68135<br>(402) 955-7575          | Will Call                 |
| (57) | Roberts, Kimberly       | Hillrise Elementary<br>20110 Hopper Street<br>Elkhorn, NE 68022   | May Call                  |
| (58) | Salter, Ofc. Joshua     | Kearney Police Dept.<br>2025 A Avenue<br>Kearney, NE 68847<br>(308) 237-2104                            | May Call<br>(deposition)  |
| (59) | Sedlack, Mark           | 5497 Grove Rd,<br>Clinton, OH 44216   | Will Call                 |
| (60) | Sesna, Ofc. David       | Kearney Police Dept.<br>2025 A Avenue<br>Kearney, NE 68847<br>(308) 237-2104                            | May Call<br>(deposition)  |
| (61) | Sokol, Ted, P.E.        | 11620 Arbor Street, Ste. #202<br>Omaha, NE 68144<br>(402) 572-9164                                      | Will Call                 |
| (62) | Stentz, Terry L., Ph.D. | 113 Nebraska Hall<br>University of Nebraska - Lincoln<br>Lincoln, NE 68588                              | Will Call                 |
| (63) | Thompson, Jerry         | Indiana Mills & Manufacturing, Inc.<br>18881 IMMI Way<br>Westfield, IN 46074<br>(317) 896-9531          | May Call                  |
| (64) | Triplett, Karen         | SafeKids Platte Valley<br>Good Samaritan Health Services<br>1755 Prairie View Place<br>Kearney NE 68845 | Will Call<br>(deposition) |

|      |                            |  |                           |
|------|----------------------------|--|---------------------------|
| (65) | Truemper, Edward, M.D.     | Children's Hospital & Medical Center<br>8200 West Dodge St.<br>Omaha, NE 68114<br>(308) 865-7100   | May Call                  |
| (66) | Tsai, Betty                | Baby Trend, Inc.<br>1607 S. Campus Ave.<br>Ontario, CA 91761<br>909-773-0018   | Will Call<br>(deposition) |
| (67) | Tsai, Denny                | Baby Trend, Inc.<br>1607 S. Campus Ave.<br>Ontario, CA 91761<br>909-773-0018   | Will Call<br>(deposition) |
| (68) | Cheri Vampola              | 14030 Woolworth Circle<br>Omaha, NE 68144  | May Call                  |
| (69) | Ward, John O., Ph.D.       | John Ward Economics<br>8340 Mission Road, Ste. #235<br>Prairie Village, KS 66206   | Will Call                 |
| (70) | Whalen III, Matthew "Chip" | Baby Trend<br>1607 S. Campus Ave.<br>Ontario, CA 91761<br>310-549-5400   | Will Call<br>(deposition) |
| (71) | Wilson, Mark, M.D.         | Children's Specialty Physicians<br>111 N. 84th Street<br>Omaha, NE 68114   | May Call                  |
| (72) | Young, Sgt. Michael        | Kearney Police Dept.<br>2025 A Avenue<br>Kearney, NE 68847<br>(308) 237-2104   | May Call<br>(deposition)  |
| (73) | Zapata, Fernando, M.D.     | Children's Specialty Physicians<br>111 N. 84 <sup>th</sup> Street<br>Omaha, NE 68114<br>(402) 955-5400                                   | Will Call                 |
| (74) | Zhao-Ren, Chen             | Lerado<br>No. 202, Rd Caixing, Dongshen,<br>Zhonshan city, Guangdong Province<br>Zhongshan Guangdong 528414 China,<br>86-760-13416037746 | May Call                  |
| (75) | Zheng-Long, Wu             | Lerado<br>No. 202, Rd Caixing, Dongshen,<br>Zhonshan city, Guangdong Province<br>Zhongshan Guangdong 528414 China,<br>86-760-13416037746 | May Call                  |

Plaintiffs reserve the right to select any witness identified on Defendants' witness lists to testify at trial.

Plaintiffs reserve the right to call witnesses at trial for impeachment purposes, if necessary.

Plaintiffs reserve the right to call witnesses at trial for purposes of establishing foundation to admit documents or respond to evidentiary objections, if necessary.

Plaintiffs reserve the right to amend or supplement this disclosure to add individuals identified through additional discovery and depositions in this matter, if necessary.

FRANCO RIBEIRO and DEANNA RIBEIRO,  
as individuals and biological parents and next  
friends of LUCAS RIBEIRO, an infant,  
Plaintiffs,

By: /s/ Michael F. Coyle  
Michael F. Coyle, #18299  
Jordan W. Adam, #23723  
Emily J. Wischnowski, #25101  
FRASER STRYKER PC LLO  
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409 South 17th Street  
Omaha, NE 68102  
(402) 341-6000 (telephone)  
(402) 341-8290 (facsimile)  
mcoyle@fraserstryker.com  
jadam@fraserstryker.com  
ewischnowski@fraserstryker.com  
ATTORNEYS FOR PLAINTIFF

CERTIFICATE OF SERVICE

The undersigned certifies that a true and correct copy of the foregoing Plaintiffs' Amended Witness List was served by electronic mail this 14th day of April, 2017, to:

John W. Patton, Jr.  
Michael G. Vranicar  
Natalie J. Eschbach  
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330 N. Wabash, Ste. #3800  
Chicago, IL 60611  
[ipatton@pattonryan.com](mailto:ipatton@pattonryan.com)  
[mvrnicar@pattonryan.com](mailto:mvrnicar@pattonryan.com)  
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By: Is/ Michael F. Coyle, #18299

19197-51429/1649734

Franco Ribeiro, et al. v. Baby Trend, Inc., et al. **Schedule A - IMMI's amended witness list**  
 Case No.: 8:12-cv-204

|   | A                               | B  | C                          | F                                    |
|---|---------------------------------|--|----------------------------|--------------------------------------|
| 1 | Witness                         | Address  | Expect to Present at Trial | May Call at Trial if the Need Arises |
| 2 | Abdallah, Elias                 | 1202 Avenue K<br>Kearney, NE 68847<br>209-937-0207   |                            | x                                    |
| 3 | Abdallah, Tara                  | 1202 Avenue K<br>Kearney, NE 68847<br>209-937-0207   |                            | x                                    |
| 4 | American Medical Response, Inc. | 9340 G. Ct.<br>Omaha, NE 68127<br>402-331-2257   |                            | x                                    |
| 5 | Apria Healthcare                | 3022 W. Potash Highway<br>Grand Island, NE 68803<br>308-381-2416                             |                            | x                                    |
| 6 | Bell, Jill, APRN-NP             | Children's Hospital & Medical Center<br>8200 W. Dodge St.<br>Omaha, NE 68114<br>402-955-4177 |                            | x                                    |
| 7 | Blum, Heidi                     | Hillrise Elementary<br>20110 Hopper St.<br>Elkhorn, NE 68022<br>402-289-2602                 |                            | x                                    |
| 8 | Boswell, Patricia               | Kearney Hub<br>4615 W. 2nd Ave.<br>Kearney, NE 68847<br>Last known address                   |                            | x                                    |
| 9 | Byrne, Dennis                   | Kearney Police Department<br>2025 Avenue A<br>Kearney, NE 68848<br>308-237-2104              |                            | x                                    |

Franco Ribeiro, et al. v. Baby Trend, Inc., et al. **Schedule A - IMMI's amended witness list**  
Case No.: 8:12-cv-204

|    | A                                    | B  | C                          | F                                    |
|----|--------------------------------------|--|----------------------------|--------------------------------------|
| 1  | Witness                              | Address  | Expect to Present at Trial | May Call at Trial if the Need Arises |
| 10 | Care Centrix                         | P.O. Box 277947<br>Atlanta, GA 30384<br>800-808-1902                                   |                            | x                                    |
| 11 | Children's Home Healthcare           | 4156 S. 52nd St.<br>Omaha, NE 68117<br>402-955-7777                                    |                            | x                                    |
| 12 | Children's Hospital & Medical Center | 8200 W. Dodge St.<br>Omaha, NE 68114<br>402-955-5400                                   |                            | x                                    |
| 13 | Children's Physicians                | 16909 Q St.<br>Omaha, NE 68135<br>402-955-7575   |                            | x                                    |
| 14 | Children's Respite Care Center       | 5321 S. 138th St.<br>Omaha, NE 68137<br>402-895-4000                                   |                            | x                                    |
| 15 | Children's Specialty Physicians      | 111 N. 84th St.<br>Omaha, NE 68114<br>402-955-5400                                     |                            | x                                    |
| 16 | Chinni, James R.                     | Engineering Answers LLC<br>842 Dorchester Dr.<br>Noblesville, IN 46062<br>317-877-7050 | x                          |                                      |
| 17 | Coram Omaha                          | 11111 Mill Valley Rd.<br>Omaha, NE 68154<br>402-330-5482                               |                            | x                                    |
| 18 | Craig Home Care                      | 220 N. 89th St.<br>Omaha, NE 68114<br>402-502-5750                                     |                            | x                                    |

Franco Ribeiro, et al. v. Baby Trend, Inc., et al. **Schedule A - IMMI's amended witness list**  
Case No.: 8:12-cv-204

|    | A   | B   | C                          | F                                    |
|----|---|---|----------------------------|--------------------------------------|
|    | Witness                                       | Address   | Expect to Present at Trial | May Call at Trial if the Need Arises |
| 1  | Cummings, Jamie                               | Safe Kids Platte Valley<br>1755 Prairie View Place<br>Kearney, NE 68845<br>308-865-2011   | x                          |                                      |
| 19 | Dowling, Jeff                                 | Kearney Police Department<br>2025 Avenue A<br>Kearney, NE 68848<br>308-237-2104           | x                          |                                      |
| 20 | ENT Specialists, P.C.                         | 720 N. 129th St.<br>Omaha, NE 68145<br>402-397-0670                                       |                            | x                                    |
| 21 | Family Physical Therapy & Sports Center, P.C. | 211 W. 33rd, Suite A<br>Kearney, NE 68845<br>308-236-5884                                 |                            | x                                    |
| 22 | Goebel, Debora                                | ENT Specialist, P.C.<br>720 N. 129th St.<br>Omaha, NE 68145<br>402-955-6370               |                            | x                                    |
| 23 | Good Samaritan Hospital                       | 10 E. 31st St.<br>Kearney, NE 68847<br>308-865-7100                                       |                            | x                                    |
| 24 | Gough, Melody                                 | 50 Plaza Blvd., Apt. 36<br>Kearney, NE 68845<br>308-216-0242                              | x                          |                                      |
| 25 | Graf, Joe                                     | CHI Health Good Samaritan Hospital<br>10 E. 31st St.<br>Kearney, NE 68847<br>308-865-7100 | x                          |                                      |
| 26 |   |   |                            |                                      |

Franco Ribeiro, et al. v. Baby Trend, Inc., et al. **Schedule A - IMMI's amended witness list**  
Case No.: 8:12-cv-204

|    | A                                | B   | C                          | F                                    |
|----|----------------------------------|---|----------------------------|--------------------------------------|
| 1  | Witness                          | Address   | Expect to Present at Trial | May Call at Trial if the Need Arises |
| 27 | Great Plains Radiology & Nuclear | 10 E. 31st St.<br>Kearney, NE 68847<br>308-234-5531   |                            | x                                    |
| 28 | Haney, Suzanne B.                | Children's Hospital & Medical Center<br>8200 W. Dodge St.<br>Omaha, NE 68114<br>402-955-6250  |                            | x                                    |
| 29 | Hanger Orthotics                 | 8111 Dodge St., Suite 330<br>Omaha, NE 68114<br>402-384-8272  |                            | x                                    |
| 30 | Hansen, Susan L.                 | Maxim Healthcare Services<br>9239 W. Center Rd., Suite 100<br>Omaha, NE 68124<br>402-399-8888   |                            | x                                    |
| 31 | Hill, Dennis                     | Kearney Police Department<br>2025 Avenue A<br>Kearney, NE 68848<br>308-237-2104   |                            | x                                    |
| 32 | Hoover, Ryan                     | 18881 IMMI Way<br>Westfield, IN 46074<br>317-867-8196   |                            | x                                    |
| 33 | Hsu, Roger                       | Lerado Group Co., LTD<br>No 202, Rd. Caixing<br>Dongshen, Zhoushan City,<br>Guangdong Province<br>Zhoushan Guangdong 528414 China<br>86-760-13416037746 | x                          |                                      |

Franco Ribeiro, et al. v. Baby Trend, Inc., et al. **Schedule A - IMMI's amended witness list**  
 Case No.: 8:12-cv-204

|    | A  | B  | C                          | F                                    |
|----|--|--|----------------------------|--------------------------------------|
| 1  | Witness  | Address  | Expect to Present at Trial | May Call at Trial if the Need Arises |
| 34 | Hurlbutt, Cassidy S.                             | 1315 E. 33rd Dr.<br>Kearney, NE 68847<br>308-237-4827                                  |                            | x                                    |
| 35 | Jarmin, Chris                                    | Buffalo County Sheriff's Office<br>2025 Avenue A<br>Kearney, NE 68847<br>308-236-8555  | x                          |                                      |
| 36 | Jordan, Ashley                                   | 1607 S. Campus Ave.<br>Ontario, CA 91761<br>909-773-0018<br>Last known address         |                            | x                                    |
| 37 | Kafka, Adam T.                                   | Madonna Rehabilitation Hospital<br>5401 South St.<br>Lincoln, NE 68506<br>402-489-7102 |                            | x                                    |
| 38 | Kearney Clinic                                   | Kearney Clinic, P.C.<br>211 W. 33rd St.<br>Kearney, NE 68845<br>308-865-2141           |                            | x                                    |
| 39 | Keifer, Katherine                                | Kearney Clinic, P.C.<br>211 W. 33rd St.<br>Kearney, NE 68845<br>308-237-2141           |                            | x                                    |
| 40 | Kids on the Move Physical & Occupational Therapy | 3226 S. 112th St.<br>Omaha, NE 68144<br>402-672-6794                                   |                            | x                                    |
| 41 | King, Julia                                      | 18881 IMMI Way<br>Westfield, IN 46074<br>317-867-8196                                  | x                          |                                      |

Franco Ribeiro, et al. v. Baby Trend, Inc., et al. **Schedule A - IMMI's amended witness list**  
Case No.: 8:12-cv-204

|    | A  | B   | C                          | F                                    |
|----|--|---|----------------------------|--------------------------------------|
| 1  | Witness  | Address   | Expect to Present at Trial | May Call at Trial if the Need Arises |
| 42 | Kratochvil-Stave, Angela                             | Kearney Clinic, P.C.<br>211 W. 33rd St.<br>Kearney, NE 68845<br>308-865-2141  |                            | x                                    |
| 43 | Kuang-Neng (Luke) Cheng<br>Tsai, James<br>Liu, Nancy | Lerado Group Co., LTD<br>No 202, Rd. Caixing<br>Dongshen, Zhoushan City,<br>Guangdong Province<br>Zhoushan Guangdong 528414 China<br>86-760-13416037746 |                            | x                                    |
| 44 | Learner, Gary S.                                     | Children's Hospital & Medical Center<br>8200 W. Dodge St.<br>Omaha, NE 68114<br>402-955-5400  |                            | x                                    |
| 45 | Lewandowski, Karen                                   | 411 E. 32nd St.<br>Kearney, NE<br>308-234-5870  |                            | x                                    |
| 46 | Lewandowski, Michael                                 | 411 E. 32nd St.<br>Kearney, NE<br>208-234-5870  |                            | x                                    |
| 47 | Lewis, Betty   | Buffalo County Sheriff's Office<br>2025 Avenue A<br>Kearney, NE 68847<br>308-236-8555   |                            | x                                    |
| 48 | Liess, Jacqueline                                    | Safe Kids Platte Valley<br>1755 Prairie View Place<br>Kearney, NE 68845<br>308-865-2011   | x                          |                                      |

Franco Ribeiro, et al. v. Baby Trend, Inc., et al. **Schedule A - IMMI's amended witness list**  
Case No.: 8:12-cv-204

|    | A                               | B   | C                          | F                                    |
|----|---------------------------------|---|----------------------------|--------------------------------------|
| 1  | Witness                         | Address   | Expect to Present at Trial | May Call at Trial if the Need Arises |
| 49 | Madonna Rehabilitation Hospital | 5401 South St.<br>Lincoln, NE 68506<br>402-413-3000                                       |                            | x                                    |
| 50 | Maendele, Bill                  | CHI Health Good Samaritan Hospital<br>10 E. 31st St.<br>Kearney, NE 68847<br>308-865-7100 |                            | x                                    |
| 51 | Mattarocci, Brad                | 1607 S. Campus Ave.<br>Ontario, CA 91761<br>909-773-0018                                  | x                          |                                      |
| 52 | Maxim Healthcare Services       | 9239 W. Center Rd., Suite 100<br>Omaha, NE 68124<br>402-399-8888                          |                            | x                                    |
| 53 | Murray, Dawn M.                 | Kearney Clinic, P.C.<br>211 W. 33rd St.<br>Kearney, NE 68845<br>308-865-2141              |                            | x                                    |
| 54 | NPPI - Anesthesiology           | P.O. Box 30265<br>Omaha, NE 68103<br>800-411-7538   |                            | x                                    |
| 55 | Omaha Public Schools            | 3215 Cuming St<br>Omaha, NE 68131<br>531-299-0237   |                            | x                                    |
| 56 | OrthoMedics                     | 13217 F St.<br>Omaha, NE 68137<br>402-614-7321  |                            | x                                    |

Franco Ribeiro, et al. v. Baby Trend, Inc., et al. **Schedule A - IMMI's amended witness list**  
 Case No.: 8:12-cv-204

|    | A                          | B  | C                          | F                                    |
|----|----------------------------|--|----------------------------|--------------------------------------|
| 1  | Witness                    | Address  | Expect to Present at Trial | May Call at Trial if the Need Arises |
| 57 | Pakvovic, Ivan             | Children's Hospital & Medical Center<br>8200 W. Dodge St.<br>Omaha, NE 68114<br>402-955-5372 |                            | x                                    |
| 58 | Rehabilitation Specialists | P.O. Box 67129<br>Lincoln, NE 68506<br>402-489-7102  |                            | x                                    |
| 59 | Ribeiro, Deanna            | 3206 N. 202nd St.<br>Elkhorn, NE 68022<br>308-440-8556                                       | x                          |                                      |
| 60 | Ribeiro, Franco            | 3206 N. 202nd St.<br>Elkhorn, NE 68022<br>308-440-8556                                       | x                          |                                      |
| 61 | Rizal, Chandrika           | Children's Physicians, Mission Valley<br>16909 Q St.<br>Omaha, NE 68135<br>402-955-7575      |                            | x                                    |
| 62 | Roberts, Kimberly          | Hillrise Elementary<br>20110 Hopper St.<br>Elkhorn, NE 68022<br>402-289-2602                 |                            | x                                    |
| 63 | Salter, Josh               | Kearney Police Department<br>2025 Avenue A<br>Kearney, NE 68848<br>308-237-2104              | x                          |                                      |
| 64 | Sedlack, Mark              | 5497 Grove Rd.<br>Clinton, OH 44216<br>330-882-5950  | x                          |                                      |

Franco Ribeiro, et al. v. Baby Trend, Inc., et al. **Schedule A - IMMI's amended witness list**  
Case No.: 8:12-cv-204

|    | A                                 | B   | C                          | F                                    |
|----|-----------------------------------|---|----------------------------|--------------------------------------|
| 1  | Witness                           | Address   | Expect to Present at Trial | May Call at Trial if the Need Arises |
| 65 | Sesna, David                      | Kearney Police Department<br>2025 Avenue A<br>Kearney, NE 68848<br>308-237-2104 | x                          |                                      |
| 66 | Total Respiratory & Rehab         | 4600 W. St., Suite A<br>Lincoln, NE 68503<br>402-466-8384                       |                            | x                                    |
| 67 | Triplett, Karen                   | 1010 F Ave.<br>Kearney, NE 68847<br>308-338-3497                                |                            | x                                    |
| 68 | Tsai, Betty                       | 1607 S. Campus Ave.<br>Ontario, CA 91761<br>909-773-0018                        |                            | x                                    |
| 69 | Tsai, Denny                       | 1607 S. Campus Ave.<br>Ontario, CA 91761<br>909-773-0018                        |                            | x                                    |
| 70 | UNMC Physicians                   | 988095 Nebraska Medical Center<br>Omaha, NE 68198<br>402-559-9800               |                            | x                                    |
| 71 | Walgreen's                        | 1901 E. Voorhees St.<br>Danville, IL 61834<br>217-554-8900                      |                            | x                                    |
| 72 | Whalen, Matthew Joseph "Chip" III | 4001 Via Oro Ave.<br>Long Beach, CA 90807<br>310-549-5400                       | x                          |                                      |
| 73 | Wilson, Mark C.                   | Children's Specialty Physicians<br>111 N. 84th St.<br>Omaha, NE 68114           |                            | x                                    |

Franco Ribeiro, et al. v. Baby Trend, Inc., et al. **Schedule A - IMMI's amended witness list**  
Case No.: 8:12-cv-204

|    | A                                   | B  | C                          | F                                    |
|----|-------------------------------------|--|----------------------------|--------------------------------------|
| 1  | Witness                             | Address  | Expect to Present at Trial | May Call at Trial if the Need Arises |
| 74 | Young, Michael                      | Kearney Police Department<br>2025 Avenue A<br>Kearney, NE 68848<br>308-237-2104              | x                          |                                      |
| 75 | Young, Oliver                       | Children's Hospital & Medical Center<br>8200 W. Dodge St.<br>Omaha, NE 68114<br>402-955-5400 |                            | x                                    |
| 76 | Zapata, Fernando                    | Children's Specialty Physicians<br>111 N. 84th St.<br>Omaha, NE 68114<br>402-955-5400        |                            | x                                    |
| 77 |                                     |  |                            |                                      |
| 78 | <b>EXPERTS:</b>                     |  |                            |                                      |
| 79 | James R. Chinni, P.E.               | Engineering Answers LLC<br>842 Dorchester Dr.<br>Noblesville, IN 46062<br>317-877-7050       | x                          |                                      |
| 80 | William W. Van Arsdell, Ph.D., P.E. | Engineering Principles, LLC<br>20 Main St., Suite 206<br>Natick, MA 01760<br>508-315-3900    | x                          |                                      |



**WITNESS LIST**

| <b>No.</b> | <b>Witness</b>        | <b>City/State</b>          | <b>Availability</b> |
|------------|-----------------------|----------------------------|---------------------|
| 1.         | Deanna Ribeiro        | Elkhorn, Nebraska          | Available           |
| 2.         | Francisco Ribeiro     | Elkhorn, Nebraska          | Available           |
| 3.         | Mark Sedlack          | Clinton, Ohio              | Available           |
| 4.         | Jamie Cummings        | Kearney, Nebraska          | Deposition          |
| 5.         | Jacquiline Liess      | Kearney, Nebraska          | Deposition          |
| 6.         | Brad Mattarocci       | Ontario, California        | Deposition          |
| 7.         | Matthew "Chip" Whalen | Long Beach, California     | Deposition          |
| 8.         | Dennis Tsai           | Ontario, California        | Deposition          |
| 9.         | Roger Hsu             | Chiayi, Taiwan             | Deposition          |
| 10.        | James Tsai            | Taiwan                     | Deposition          |
| 11.        | Michael Young         | Kearney, Nebraska          | Deposition          |
| 12.        | David Sesna           | Kearney, Nebraska          | Deposition          |
| 13.        | Joseph Graf           | Kearney, Nebraska          | Deposition          |
| 14.        | William Van Arsdell   | Natick, Massachusetts      | Available           |
| 15.        | Michael Prange        | Philadelphia, Pennsylvania | Available           |
| 16.        | Christine Wood        | Menlo Park, California     | Available           |
| 17.        | Bo Isacson            | Halmstad, Sweden           | Deposition          |

17. Any and all other witnesses identified by the other parties in this matter.

DATED this 14<sup>th</sup> day of April, 2017.

Respectfully submitted,

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## PROOF OF SERVICE

The undersigned certifies that the foregoing instrument was served upon all parties to the above cause by depositing the same in the U.S. Mail, postage prepaid, to their respective mailing addresses disclosed on the pleadings or, in the event the party is represented by counsel, to their counsel; or notice of the filing of this instrument was sent by e-mail, via CM/ECF, to all parties on the service list who have registered to receive service by e-mail over CM/ECF, on April 14, 2017.

/s/ Jeff W. Wright

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