

STATE OF WEST VIRGINIA
IN THE CIRCUIT COURT FOR THE COUNTY OF MONONGALIA

EUGENE DIAZ, JR. and
STEPHEN NICHOLAS SAWYER, an
infant, acting by and through
SHIRLEY SAWYER, his Mother and
Next Friend,

Plaintiffs,

-vs-

No. 92-C-1103

FORD MOTOR COMPANY, a Delaware
corporation, and WILSON FORD,
INC., d/b/a WILSON FORD-LINCOLN-
MERCURY, a West Virginia
corporation,

Defendants.

D E P O S I T I O N O F

DAVID J. BICKERSTAFF

Hyatt Regency Hotel
Suite 475
Dearborn, Michigan

Monday, October 25, 1993
10 o'clock a.m.

APPEARANCES:

FOR PLAINTIFFS: SPILMAN, THOMAS & BATTLE
1200 United Center
500 Virginia Street East
Charleston, West Virginia 25321-0273
BY: **MR. EDGAR F. HEISKELL, III**
MR. DAVID K. HENDRICKSON

FOR DEFENDANT: PARCEL, MAURO, HULTIN & SPAANSTRA, PC
1801 California Street, #3600
Denver, Colorado 80202-2636
BY: **MR. JAMES HINGA**

REPORTER: Susan S. Perrish, CSR, RPR-CM

PATRICIA MURRAY & ASSOCIATES
BRIGHTON (313) 229-8238
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EXHIBIT

TALKER
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DAVID J. BICKERSTAFF

1 and ambiguous.

2 THE WITNESS: It's very difficult to make
3 an absolute tie. I think because the driver is a
4 big part of this, the -- something that might be
5 safer for one driver might be less safe for another,
6 because there's such a wide variety of skills, and I
7 don't think you could find a combination that would
8 be safe under all circumstances for everybody.

9 And I'm saying that in the context of
10 somebody losing control of the vehicle, for example.

11 BY MR. HEISKELL:

12 Q. All right. Can you relate stability index to
13 safety?

14 A. A number of people I understand have attempted to
15 draw correlations between the absolute stability
16 index and safety, but there are so many vehicles
17 with such a wide range of stability indexes from --
18 that exist in a population that there's a lot of
19 other factors that -- stability index by itself may
20 be a partial factor, okay, but there are a lot of
21 other factors.

22 Q. Well, would it be a fair statement to say that
23 during your work on the Bronco II project you were
24 concerned about trying to maximize the stability
25 index?

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