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September 15, 1999

VIA FEDERAL EXPRESS

Dr. Alan Ross
469 Prospect Street
NCSBS
Torrington, CT 06790

RE: School Bus Safety
Christina Chadwick vs. AmTrans
St. Francis County, Arkansas
CIV 97-4

Dear Alan:

As I explained to you over the phone, all that I can state is that the case was settled, that there were four students involved and that of the twenty-two children injured at least six of them had serious injuries although only four retained an attorney to file a suit against the manufacturer. The manufacturer, AmTrans, is the successor to Ward Bus.

I am enclosing to you the following:

(a), Arnold Siegel Deposition-Siegel, states that the injuries of Christina Chadwick, Thomas Carlock, Joey Paulman and, Char Chadwick, Jr., were occasioned by an accident in which they were unrestrained and that the lack of seatbelts was a substantial factor (proximate cause) in causing their injuries; these opinions were to a reasonable degree of scientific certainty; Siegel testified that this was a design flaw in the bus;

(b) Deposition of Bennie Hipp, DDS-oral surgeon who put the jaw of Joey Paulman back together; his deposition states that the failure to provide seatbelts was a substantial factor

(proximate cause) in causing the jaw fractures; this opinion was to a reasonable degree of medical certainty;

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(c) Deposition of S.T. Canale, M.D., the Campbell Clinic, Memphis, Tennessee in the Joey Paulman case-Paulman's broken arm was due to a reasonable degree of medical certainty according to Dr. Canale, an internationally renowned orthopedic surgeon, to the lack of a seatbelt on the school bus; and

(d) Deposition of S.T. Canale, M.D., on Thomas Carlock-Canale testified that the hip fracture of Carlock was to a reasonable degree of medical certainty due to a lack of seatbelts on the school bus.

Arnold Siegel has a sub-specialty in biomechanics and Dr. Hipp is a professor of oral and maxillofacial surgery at the University of Tennessee Medical School and Dr. Canale is the President of The Campbell Clinic and also a professor of orthopedic medicine at the University of Tennessee Medical School and the author of Campbell's Orthopedics in its present edition. The list of papers by Drs. Hipp, Mr. Siegel and Dr. Canale would fill a banker's box. I also have a Day-In-The-Life film of Christina Chadwick who was rendered a paraplegic in the accident which shows the difficulties which this child, injured at eighteen, encounters on a daily basis. If you need, that, please advise. Her Life Care Plan placed her lifetime losses at \$3 Million or higher. She was thrown 6 seats forward in this over-turn accident and Joey Paulman was ejected from the bus. Charles Chadwick, Jr., and Thomas Carlock were tossed about in the bus, causing their injuries. Christina's medicals were \$129,000 to date of trial.

I also enclose the "uncut" version of the 1964 Conway, Arkansas Ward School Bus Crash Test, since I understand that you have the edited version.

Sincerely yours,

Mark Ledbetter

ML/ad

Enclosures

IN THE CIRCUIT COURT OF ST. FRANCIS COUNTY
FOR THE STATE OF ARKANSAS

CHARLES CHADWICK, SR., INDIVIDUALLY)
AND AS GUARDIAN AND NEXT FRIEND OF)
CHARLES CHADWICK, JR., A MINOR, AND)
CHRISTINA, CHADWICK; JEAN CARLOCK,)
GUARDIAN AND NEXT FRIEND OF THOMAS)
CARLOCK, A MINOR,)

Plaintiffs,)

VS.)

AMTRAN INTERNATIONAL CORPORATION,)
AMERICAN TRANSPORTATION CORPORATION,))
AND WARD BUS SALES, INC.,)

Defendants.)

No. CIV-97-4

DEPOSITION OF
ARNOLD SIEGEL

VOLUME I

(Pages I 114)

TAKEN ON: THURSDAY, JULY 29, 1999

TAKEN AT: 6101 W. CENTURY BOULEVARD
LOS ANGELES, CALIFORNIA

REPORTER: RANDY D. GARRETT CSR NUMBER 8931