



Jeremy E. Bowers, Member
jbowers@barnwell-whaley.com

August 26, 2019
Via U.S. Mail

Gary E. Kilpatrick, P.E.
The Kilpatrick Group
3397 Cherrybrook Drive
Jamestown, NC 27272

Re: Letter of Recommendation

To Whom It May Concern:

Our law firm retained Mr. Kilpatrick to inspect possible defects in a replacement seatbelt installed on a school bus in 2017 following an accident and injuries to the bus driver. He performed a thorough inspection of the replacement seatbelt and school bus, including testing the various components of the seatbelt, performing hard stop tests, and photographing/videoing the inspection. During the inspection, Mr. Kilpatrick kept me informed of his findings and showed me the exact areas he thought were at issue. Following the inspection, the attorney for the bus owner was so impressed with the thoroughness of Mr. Kilpatrick's inspection that she asked to receive a copy of his report even though the bus owner was not involved in the litigation at all.

As the litigation initially was in federal court, Mr. Kilpatrick also prepared a detailed report as required by Rule 26(a)(2)(B), FRCP. The report outlined Mr. Kilpatrick's inspection, findings, and conclusions in a succinct and easy to understand manner. He detailed the findings he made during his testing and inspection related to the various component parts, including the seatbelt webbing, tongue plate D-ring, and retractor. He also explained how those various component parts work together and how the issues with one component part could be evidenced in the others. For example, during the inspection, Mr. Kilpatrick noted the webbing was knotted and twisted in the tongue plate D-ring and this finding led him to issues with the retractor failing to retract all the webbing slack. He also was able to support his findings and conclusions with photographic and video evidence from his inspection.

In addition to the inspection, Mr. Kilpatrick assisted us in various ways as we progressed with discovery. First, he reviewed technical documents related to the design and manufacture of the seatbelt from the manufacturer and explained those documents to us. Second, he performed tests on a sample replacement seatbelt of a similar brand and model to compare to the actual replacement seatbelt in the school bus at the

www.barnwell-whaley.com

SOUTH CAROLINA OFFICE:
288 Meeting Street, Suite 200, Charleston, SC 29401
P 843.577.7700 F 843.577.7708

NORTH CAROLINA OFFICE:
201 N. Front Street, Suite 1003, Wilmington, NC 28401
P 910.679.1388 F 910.679.4663

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time of the accident. Finally, he assisted us in our preparation for deposing the opposing experts, including providing us with a list of potential examination questions.

We found Mr. Kilpatrick to be very knowledgeable and detailed in his forensic inspection and case work for us. He timely responded to questions and made himself available whenever needed. He was also very cordial and polite in all of communications. Mr. Kilpatrick added a tremendous amount of value to a very difficult case, and his efforts certainly helped us ultimately resolve the matter. We greatly appreciate all the hard work performed by Mr. Kilpatrick in this matter, and we would certainly recommend Mr. Kilpatrick to anyone needing to retain a professional engineer to perform a thorough inspection of a seatbelt or school bus.

If you have any questions, please do not hesitate to contact me. With kind regards, I remain

Sincerely,

Jeremy E. Bowers