

## **Robert J. Waters**

Waters Consulting  
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### **PROFILE:**

I have been performing automotive engineering consulting services since 1993, providing thorough technical assistance in all areas of automotive engineering and technologies. My experience includes cases related to small claims, Lemon Law, personal injury, fraud, unsafe vehicle sales, dealership practices, product liability, failure analysis, and wrongful death. Clients include law enforcement agencies, insurance carriers, law firms, manufacturers and individuals. Most cases involve loss of life or disabling injuries.

### **PROFESSIONAL TRAINING, AFFILIATIONS AND LICENSES:**

- Certified Master Technician, Ford Motor Company
- Over 2,000 hours of formal and multimedia training related to vehicle diagnosis and repair (see attached listing of completed courses)
- National Institute for Automotive Service Excellence, Certified Master Technician in:
  - A1 Engine Repair
  - A2 Automatic Transmission
  - A3 Manual Drivetrain and Axles
  - A4 Suspension and Steering
  - A5 Automotive Brakes
  - A6 Electrical Systems
  - A7 Heating and Air Conditioning
  - A8 Engine Performance
  - C1 Automobile Service Consultant
  - L1 Advanced Engine Performance
- Elected Member, Society of Automotive Engineers #6102220456
- Member, International Automotive Technicians Network
- Member, Center for Auto Safety, Washington, D.C.
- Member, California Association of Accident Reconstruction Specialists
- California Highway Patrol-approved motorcycle safety and accident avoidance course, 2003
- Graduate of Bob Bondurant School of High Performance Driving and Accident Avoidance, 1999
- Listed in Best's Directory of Recommended Attorneys, Adjusters and Expert Service Providers (A.M. Best Company)

### **WORK HISTORY AND AREAS OF EXPERTISE:**

- *1975 to 2005 – Ford Motor Company/Lincoln Mercury dealer technician (ten years as shop foreman).* Thirty years as a technician, with vast experience in inspecting and diagnosing thousands of vehicles.
- *1993 to present – Litigation Consultant, Waters Consulting.* Fifteen years experience in investigating legal cases related to failure analysis, product liability, Lemon Law, automotive brakes, antilock brakes, transmissions (manual and automatic), drive axles, engines, engine controls, heating and air conditioning, steering and suspension, seat belts, passive restraints, air bags, supplemental restraint systems, fire damage appraisal and investigation, vehicle maintenance, dealership and repair facility practices. Articulate expert witness testimony, with a keen ability to translate complex technical information into layman terms for both jurors and attorneys.

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### *Formal and multimedia training courses completed:*

Basic Electrical Theory and Operation  
Battery Starting and Charging Systems  
Electrical Diagnostic Tools and Testing, part 1  
Electrical Diagnostic Tools and Testing, part 2  
Basic Electrical Diagnosis  
Electronics Theory and Operation  
Understanding Electronic Systems  
NGS Tester Operation  
Basic WDS Tool Operation  
Electronic System Diagnosis  
Networks and Multiplexing  
Supplemental Restraints operations and Diagnosis  
Ignition System Theory and Operation  
Fuel and Air Theory and Operation  
Exhaust and Emissions Theory and Operation  
Fuel, Air, Ignition and Emission  
OBD II Monitors  
Engine Performance Theory and Operation  
Diagnostic Process  
Diagnostic Routines  
Engine Performance Diagnosis and Testing  
Diagnosis and Testing OBD II Vehicles  
Adv. Engine Performance for Diagnosis & Testing  
Engine Repair Fundamentals  
Automotive Measuring Tool  
Base Engine Operations and Diagnosis  
Engine Repair Class  
Servicing Overhead-Cam Engines  
7.3L Diesel Diagnosis  
Diesel Engine Operation Fundamentals  
Diesel Engine Theory and Operations  
Diesel Fuel Supply and Fuel Injection  
Diesel Air Inlet and Exhaust  
7.3L Diesel Diagnosis  
Diesel Diagnostic Procedures  
Diesel Engine Performance  
Differential and Driveline Operation  
Differential and Driveline Repair  
Manual Transmission and Transaxle Operations I  
Manual Transmission and Transaxle II  
Manual Transmission and Transaxle Repair III  
Transfer Case and 4-WD System Diagnosis I  
Transfer Case and 4-WD System Diagnosis II  
Transfer Case and 4-WD System Repair III  
Automatic Transmission Hydraulics/Mechanical Operations  
Automatic Transmission Electronics  
Automatic Transmission Diagnosis  
Intro to Automatic Transmission/Transaxle Repair  
Front Wheel Drive Automatic Transmission Repair  
Rear Wheel Drive Automatic Transmission Repair

Advanced Automatic Transmission Diagnosis  
Vehicle Brake Systems  
Brake Service Procedures  
Brake System Diagnosis and Service  
Advanced Brake System Theory and Operations  
Advanced Brake System Diagnosis  
Advanced Brake System Diagnosis and Service  
Steering and Suspension  
Noise, Vibration and Harshness Principles/Diagnosis  
Brakes Systems Update  
Forensic Examination of Anti-Lock Brake System 2006  
Investigation of Automotive Fires 2007

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### ***Litigation experience examples:***

#### **Defense:**

- Single fatality truck and train accident, disproved transmission, ignition and fuel system failures. Case withdrawn
- Lemon Law fraudulent vehicle sale. Case withdrawn
- Single fatality rollover. Settled confidential
- Single fatality transmission park gear failure. Settled confidential
- Major injury incident on dealership property. Settled confidential
- Lemon Law, misrepresented vehicle sale. Settled confidential
- Lemon Law, 100K vehicle, paint and hidden damage issues. Settled confidential

#### **Plaintiff:**

- Power sliding door defect causing personal injury. Settled confidential (G.M. released a recall to repair this concern soon after my report was submitted)
- Lemon Law oil consumption concern. Settled confidential
- Major injury, repair shop standard of care issue: brake job not performed correctly. Settled confidential
- Major injury rollover, brake failure (litigation pending)
- Single fatality rollover, vehicle inspection. No litigation filed
- Single fatality, unintended acceleration, Settled confidential
- Three fatalities, engine failure: vehicle stalled and subsequently rear ended. Settled confidential
- Minor injury, brake failure upon picking vehicle up from repair facility. Settled confidential
- Major injuries to two police officers, vehicle was picked up from the dealership after complete brake job. Proved wrong parts used and improper post road test performed as per factory service bulletin. Settled confidential
- Lemon Law transmission failure. Settled confidential
- Three fatalities rollover. Jury trial, award \$295 million
- Unsafe vehicle sale, smog control altered. Settled confidential
- Class action suit against an automotive manufacturer, multi million dollar settlement