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## **MICHAEL NRANIAN**

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**Cell: 248-376-0338**

### **ADDITIONAL PRODUCT LIABILITY EXPERIENCE INFORMATION:**

I have directly participated in more than 300 litigation cases providing overall technical and legal case management from notice through trial if necessary, including working with trial counsel, development of case and trial strategy, dispute resolution, and in-depth evaluations of multiple high-dollar lawsuits and claims. I have extensive experience in analyzing and assessing litigation risks. I have direct experience in all areas of discovery and motion practice as well as trial and settlement procedures. I understand the importance of accurate and consistent discovery and I have overseen and prepared hundreds of sets of responses to requests for productions, interrogatories, and requests for admissions. I have deposition, hearing and trial experience in state and federal jurisdictions throughout the United States. I have extensive experience in providing litigation and counseling support to national clients. I have extensive experience in analyzing and assessing claims and then working with product development activities and leading cross-functional teams to implement the necessary design changes to continuously improve products and designs and reduce overall exposure. I have direct experience in summary judgment proceedings, evidentiary hearings, motions in limine, as well as the related opposition and reply documents. I have prepared numerous expert witness reports, and have served as the expert witness and/or corporate representative in depositions, hearings, and trials, in state and federal jurisdictions throughout the United States for product liability cases. I have prepared and prepped other witnesses prior to their depositions and trial testimonies, including all potential cross-examination questions. Complete Forensic Analyses and Investigations.

Additionally, through these experiences, I have developed strong working knowledge of the following areas, among others:

- Product Liability Law, Automotive Defense, Indemnification. Forensic Analyses.
- Injury Thresholds as Related to Statutory Bars. Injury causation. Kinematic analyses.
- Medical devices, wheelchairs, motorized wheelchairs, controllers, and handicap assistance devices.
- Workplace safety/standards, Fall Protection, - OSHA, ANSI, etc. Inertia mechanisms, webbing, harnesses, forensics.
- Regulatory Requirements, including all FMVSS, ECE, SAE, Due-Care, Product Prove-out Interpretation/Compliance.
- Automotive and Truck (including Tractor-Trailer) systems, commercial recreational vehicles, construction equipment.
- Sensing systems, including all crash recorders (Direct design experience in these modules for over 20 years).
- Programming and algorithm development and verification to meet system requirements.
- Design Validation Plans and Reports, Failure Modes and Effects Analyses, product prove-out, design verification, reliability and durability analyses.
- Electrical, electronic, electro-mechanical, camera/vision, weight/occupant sensing, components and systems. Software, source code, algorithm, processes and methods. Quality control/assurance.
- Analysis of component defects including seats, seatbelts, pre-tensioners, load limiters, curtains, airbags, roof crush, structure, doors, and all modes of sensors. FMVSS and IIHS testing. Sled & Barrier & Crash testing. Forensic Analyses.
- Analysis of alternative designs, as well as design and product prove-out assessment and field analysis.
- Occupant kinematics & injury causation. Occupant detection and Out-of-position occupant detection & injury mitigation.
- Accident reconstruction and analysis of crash pulse information. Parameter and data analyses.
- Electrical systems and architecture, diagnostics, fault codes, forward collision warning, lane departure warning, collision warning, autonomous braking/cruise control, tire pressure monitoring, blind spot detection.
- Fire cause and origin (chemical/electrical). Fuel systems.
- Diagnostic system and fault code analyses, audio/visual warning systems, fail safes, labels, vehicle/operator performance.
- Insurance Law, No Fault Insurance Law, Subrogation, Class Actions, NHTSA complaints & responses.
- Automotive OEMs, Customers, Suppliers, Manufacturing, Operations in domestic, European and Asian environments.
- Depositions, Expert Testimony, Trial Testimony, and Witness Preparation.
- Field Analysis of Product Liability Issues and the Implementation of Design Changes to continuously improve products.
- Support for development of Trial Strategies, Trial and Motion Practice, Dispute Resolution, Negotiation, and Settlement.
- All Aspects of Discovery and Disclosure Requirements, e-Discovery, Establishment of Discovery Policy and Strategy.
- Document Production and Accurate/Consistent Response Preparation.
- Pre-emption arguments, express, implied, or fact-specific analyses.
- Represent clients in all aspects of electrical, chemical, software methods/processes, computers, microprocessors, source code, programming, and controllers. Automotive components and systems. Safety systems, accident avoidance, telematics/telecommunications, mobile cellular information data transmission (transmitters/receivers), traffic/weather, communication protocols, radio optical satellite wireless mediums, GPS, navigation, monitoring & surveillance, security/tracking systems, camera/vision/optical systems, fleet management systems, Bluetooth, smartphones, truck, recreational, and commercial vehicle systems, construction/excavation, electrical/electronic, diagnostics, etc.