

TRUJILLO RODRIGUEZ & RICHARDS, LLC

Donna Siegel Moffa, Esquire
8 Kings Highway West
Haddonfield, NJ 08033
(856) 795-9002

Additional Counsel on Signature Page
Attorney(s) for Plaintiff and the Class

REGINA LITTLE, on behalf of herself and others similarly situated,	:	SUPERIOR COURT OF
	:	NEW JERSEY – LAW DIVISION
	:	UNION COUNTY
Plaintiff,	:	
	:	DOCKET NO. UNN-L-0800-01
v.	:	
	:	
KIA MOTORS AMERICA, INC.,	:	
	:	CLASS ACTION
Defendant.	:	

PLAINTIFF’S EXHIBIT LIST

Plaintiff, by her undersigned counsel, hereby serves her Exhibit and Witness Lists in accordance with the Final Case Management Order entered on September 12, 2007.

1. Plaintiff’s Exhibit List

EXHIBIT NO.	DOCUMENT	Marked	Admitted	Objections
P-1	Plaintiff’s Purchase Documents			
P-2	Kia’s Express Warranty 1999 Kia Sephia (KMA 08015125)			
P-3	Plaintiff Regina Little’s Repair Invoices			
P-4	1/18/99 Memorandum regarding KMC/KMA Quality Assurance Meeting (KMA 0202000351); KMA and KMC Quality Meeting dated January 1999 (KMA 020200001, 17,23-27)			

EXHIBIT NO.	DOCUMENT	Marked	Admitted	Objections
P-5	10/12/2001 Email to Tim McCurdy from Jim Richert confirming pad/rotor shipment (KMA 0202000240 -02041)			
P-6	Kia Technical Operations Product Report (KMS 0202000308-323)			
P-7	KMC Proposed Brake Pad Change Memorandum from Timothy McCurdy, dated February 3, 1999 (KMA 0202000346-352)			
P-8	Sephia Brake Pad Test Overview "LA City Brake Test 7/12/1999" (KMA 0202000412)			
P-9	Kia Brake Bulletin			
P-10	Kia Technician Times, dated June 2000 (KMA 0202000304)			
P-11	Kia Technician Times, dated August 2000 (KMA 08014439)			
P-12	Photographs Taken by R. Scott King, M.E.			
P-13	Kia Technical Service Bulletins:			
P-13(a)	March 1997 (KMA 0202000404)			
P-13(b)	June 1998 (KMA 0202000367)			
P-13(c)	January 1999 (KMA 0202000364)			
P-13(d)	August 1999 (KMA 08014437)			
P-13(e)	January 2002 (KMA 0202000357)			
P-14	Kia Parts Bulletin dated January 2002 (KMA 030200002)			
P-15	KETT Testing Documents			
P-15(a)	KETT Engineering Corporation LA City Traffic Brake Test: 142-2 (KMA 030200238-284)			
P-15(b)	KETT Engineering Corporation LA City Traffic Brake Test: 735-1 (KMA 030200285-329)			

EXHIBIT NO.	DOCUMENT	Marked	Admitted	Objections
P-15(c)	KETT Engineering Corporation LA City Traffic Brake Test: 968-2 (KMA 030200330-376)			
P-15(d)	KETT Engineering Corporation LA City Traffic Brake Test: 573-2 (KMA 030200377-423)			
P-15(e)	KETT Engineering Corporation LA City Traffic Brake Test: 968-1 (KMA 030200192-237)			
P-15(f)	KETT Engineering Corporation LA City Traffic Brake Test: 573-1 (KMA 030200147-191)			
P-16	Kia F-1 T.F.T., "Field Fix", dated 9/10/2001 (KMA 030200116-133)			
P-17	Kia F1 T.F.T., "F1 Analysis Result of Claimed Parts and Further Plan", dated 5/26/2001 (KMA 030200134-146)			
P-18	Exemplar of Sephia Brake System including 2000 OEM Brake Pads, Rotors and Calipers and Field Fix Brake Pads, Rotors and Calipers (Demonstrative Aid)			
P-19	Sephia Brake Pad Monitor program Memorandum dated September 10, 1998 (KMA 0202000259)			
P-20(a)	Quality Assurance Field Product Report (KMA 08014748)			
P-20(b)	Quality Assurance Field Product Report (KMA 08014895)			
P-20(c)	Quality Assurance Field Product Report (KMA 08014791)			
P-21	Technical Assistance Center Incident Reports (KMA 08014924-945)			
P-22	Repair Invoice from Value Kia dated January 29, 2002			

EXHIBIT NO.	DOCUMENT	Marked	Admitted	Objections
P-23	Vendor Visits Warranty Claims Rate, dated August 1999 (KMA 0202000231)			
P-24	New Pad Material Development Status (2) Memorandum, dated March 19, 1999, (KMA 0202000616)			
P-25	Kia's Express Warranties			
P-25(a)	1997 (KMA 08015116)			
P-25(b)	1998 (KMA 08015202)			
P-25(c)	2000 (KMA 08015280)			
P-26	KIA Warranty Booklet, Maintenance Schedule (KMA 08014465-66)			
P-27	Coupon Program Documents (KMA 030200020-27; 030200004-05)			
P-28	Email from Bill Bradley dated January 24, 2002, re: CS001 File Vin Count (KMA 030200017)			
P-29	Sephia/Sephia Brake Component Pricing, dated February 28, 2002 (KMA 030200001)			
P-30	Kia Warranty Claim Reference Guide, effective March 1, 2000 (KMA 0202000163)			
P-31	KMA Press Releases from January 15, 2001 and August 2001			
P-32	Warranty Claim Report (KMA 0202000162)			
P-33	Email from Jim Merimon dated January 22, 2002 re: Chassis 0081 Sephia/ Spectra Brake Rotors and Pad Change (KMA 030200018)			
P-34	Select Print Ads for the Kia Sephia, enlarged			
P-35	Kia Technician Times April 1998 "Sephia Repair Tips" (KMA 08014441)			
P-36	KMA Document Submission List (KMA 0202000596-632)			

EXHIBIT NO.	DOCUMENT	Marked	Admitted	Objections
P-37	Purchase Documents and Repair Invoices for Shamell Bassett			
P-38	Purchase Documents and Repair Invoices for Yvonne Butler			
P-39	Purchase Documents and Repair Invoices for Joann Gabler			
P-40	Purchase Documents and Repair Invoices for E. Alford			
P-41	Purchase Documents and Repair Invoices for Gayle Miller			
P-42	Gayle Miller's Customer Affairs Complaints			
P-43	CV and Report of Scott King, M.E., Reports of Scott King on the merits and on class certification, including reports incorporated therein by reference;			
P-44(a)	Report of John Matthews			
P-44(b)	Kelley Blue Book and NADA records and summaries related to opinions of John Matthews including CD			
P-45	1997 KIA Sephia Color Brochure			
P-46	The Sephia Engine Teardown Report Card			
P-47	Correspondence from J.S. Park to Head of Export Service Team "Request for Review and Field Fix Proposal regarding Critical Quality Issues" (KMA0202000632)			
P-48	KMC Field Fix Proposal Review (KMA 0202000630-631; 0202000633-637)			
P-49	Defendant Kia Motors America Inc.'s Responses to Interrogatory Number (3)			
P-50	Deposition of Timothy McCurdy dated February 22, 2002			
P-51	Demonstrative and Summary Aids, including electronic or video displays			
P-52	Video & Hard Copy of Deposition of Bill Butterfield			

EXHIBIT NO.	DOCUMENT	Marked	Admitted	Objections
P-53	Deposition of Michelle Cameron dated 2/21/02			
P-54	Deposition of YS Sohn and exhibits 1-4 attached thereto;			
P-55	Depositions of Neil Barbalato and all exhibits attached thereto;			
P-56	Depositions of John Matthews on the merits, including charts, exhibits and demonstratives;			
P-57	Depositions of Rick Weisehan and all exhibits attached thereto			
P-58	Deposition of Lee Sawyer and all exhibits attached thereto;			
P-59	Depositions of Donald Pearce and all exhibits attached thereto;			
P-60	Deposition of Lepoidvin			
P-61	Deposition of Gene Stephen Johnson			
P-62	Deposition of Joe Dupre dated 3/22/02 and all exhibits used during the deposition			
P-63	Correspondence regarding BBB Autoline			
P-64	List of NJ Class Members			
P-65	Class Notice in <i>Little v. Kia Motors America</i> and mailing list			
P-66	Class Certification Decisions in <i>Samuel-Bassett v. Kia Motors America</i>			
P-67	Post-Trial Decision in <i>Samuel-Bassett v. Kia Motors America</i>			
P-68	Superior Court Decision in <i>Samuel-Bassett v. Kia Motors America</i>			
P-69	Class Notice, Settlement Agreement and Final Approval Order in <i>Santiago v. Kia Motors America</i>			
P-70	Courtroom Testimony from <i>Samuel-Bassett v. Kia Motors America</i> (Phila C.P.) (available in courtroom upon request)			
P-71	All exhibits offered by Plaintiff and Defendant in <i>Samuel-Bassett v. Kia Motors America</i>			
P-72	Updated Warranty and other produced by Defendant late and under review by Plaintiff			

EXHIBIT NO.	DOCUMENT	Marked	Admitted	Objections
P-73	All exhibits listed by Defendant			