

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION**

**DONALD LOUGHRAN and LINDA  
LOUGHRAN, Individually and as  
Next Friend to M.L., A Minor  
vs.**

**KIA MOTORS AMERICA, INC. and  
KIA MOTORS CORPORATION**

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CIVIL ACTION NO. 3:17-CV-1632

**NOTICE OF INTENTION  
TO TAKE DEPOSITION BY WRITTEN QUESTIONS**

TO: ALL PARTIES BY AND THROUGH THEIR ATTORNEY(S) OF RECORD AS PROVIDED IN THE ATTACHED SERVICE LIST.

You will take notice that fourteen (14) days after the service hereof, with attached questions, a deposition by written questions will be asked of the custodian of records for:

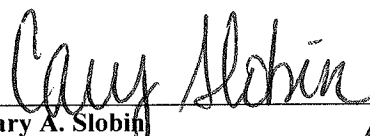
**LORENTZ AUTOMOTIVE-(Auto Repair Records)  
600 N. MILL STREET, LEWISVILLE, TX 75057**

Such questions to be answered on or before **11/20/2017**, before a Notary Public at the instance of:

**Written Deposition Service, LLC  
1750 Valley View Lane Suite 210  
Dallas, Texas 75234**

The deposition with attached questions may be used in evidence upon the trial of the above-styled and numbered cause pending in the above named court. Notice is further given that request is hereby made as authorized under Rules 31 & 45, Federal Rules of Civil Procedure, to the officer taking this deposition to issue a Subpoena Duces Tecum and cause it to be served on the witness to produce any and all records as described on the attached questions and/or Exhibit(s) and any other such record in the possession, custody or control of the said witness, and every such record to which the witness may have access, and to turn all such records over to the officer authorized to take this deposition so that photographic reproductions of the same may be made and attached to said deposition.

Respectfully Submitted,



Cary A. Slobin

SBA #: 00797445

Bowman and Brooke LLP

5830 Granite Pkwy., Suite 1000

Plano, TX 75024

972-616-1700; Fax 972-616-1701

cary.slobin@bowmanandbrooke.com

Attorney for: Defendant Kia Motors America, Inc. and Kia  
Motors Corporation

**CERTIFICATE OF SERVICE**

I certify, as authorized agent for the attorney of record, Cary A. Slobin, that a true and exact copy of foregoing Notice of Intention to Take Deposition upon Written Questions was served to all attorneys of record in the above-styled and numbered matter, said service being effected in the following manner:

CERTIFIED MAIL/RETURN RECEIPT REQUESTED \_\_\_\_\_

HAND DELIVERY \_\_\_\_\_

TELECOPY \_\_\_\_\_

OVERNIGHT/NEXT DAY DELIVERY VIA LONE STAR OR UPS \_\_\_\_\_

E-MAIL \_\_\_\_\_

DATED: 11/3/17

BY: 

SERVED TO ALL PARTIES LISTED BELOW:

*Donald Loughran, et al vs. Kia Motors America, Inc., et al*

**ATTORNEYS OF RECORD**

E. Todd Tracy  
The Tracy Firm  
4701 Bengal Street  
Dallas, TX 75235  
214-324-9000; Fax: 972-387-2205  
Attorney For: Plaintiff

LOUGHRAN000143

**United States District Court**  
**FOR THE NORTHERN DISTRICT OF TEXAS**  
**DALLAS DIVISION**

**DONALD LOUGHRAN and LINDA LOUGHRAN, Individually and as Next Friend to M.L., A Minor**  
vs.

**SUBPOENA IN A CIVIL CASE**

**KIA MOTORS AMERICA, INC. and KIA MOTORS CORPORATION**

Civil Action No. 3:17-CV-1632

**SUBPOENA TO TESTIFY AT A DEPOSITION IN A CIVIL ACTION**

**TO:** Custodian of Records for: **LORENTZ AUTOMOTIVE**  
**600 N. MILL STREET**  
**LEWISVILLE, TX 75057**

☒ **Testimony:** YOU ARE COMMANDED to appear at the time, date, and place set forth below to testify at a deposition to be taken in this civil action. If you are an organization that is *not* a party in this case, you must designate one or more officers, directors, or managing agents, or designate other persons who consent to testify on your behalf about the following matters, or those set forth in an attachment.

Place: The office of the custodian  
**600 N. MILL STREET**  
**LEWISVILLE, TX 75057**

DATE AND TIME

**11/20/2017, 10:00AM**

The Deposition will be recorded by this method: **Deposition by Written Question**

☒ **Production:** You, or your representatives, must also bring with you to the deposition the following documents, electronically stored information, or objects, and permit their inspection, copying, testing, or sampling of the material:  
**See attached Exhibit**

The provisions of Fed. R. Civ. P. 45 are attached - Rule 45(c), relating to the place of compliance; Rule 45 (d) relating to your protection as a person subject to a subpoena and Rule 45(e) and (g), relating to your duty to respond to this subpoena and the potential consequences of not doing so.

Date: 11/3/17  
**CLERK OF COURT**

OR

\_\_\_\_\_  
*Signature of Clerk or Deputy Clerk*

\_\_\_\_\_  
*Attorney's signature*

*Cary A. Slobin*  
(KS)

The name, address, e-mail, and telephone number of the attorney representing *Kia Motors America, Inc. and Kia Motors Corporation* who issues or requests this subpoena are: **Cary A. Slobin, Bowman and Brooke LLP, 5830 Granite Pkwy., Suite 1000, Plano, TX, 75024**

## **EXHIBIT**

**ANY AND ALL RECORDS, INCLUDING BUT NOT LIMITED TO, AGREEMENTS, REPAIRS AND OR MAINTENANCE RECORDS, INSPECTION REPORTS, WORK ORDERS, INVOICES, BILLS, ESTIMATES, PHOTOGRAPHS, RECEIPTS, AND EVERY SUCH RECORD, INCLUDING BUT NOT LIMITED TO, THOSE EXISTING IN ELECTRONIC OR MAGNETIC FORM, PERTAINING TO A 2013 KIA SOUL; VIN: KNDJT2A63D7537209**

Civil Action No. **3:17-CV-1632**

**PROOF OF SERVICE**

*(This section should not be filed with the court unless required by Fed. R. Civ. P. 45.)*

This subpoena for (name of individual and title, if any) \_\_\_\_\_  
was received by me on (date) \_\_\_\_\_.

I served the subpoena by delivering a copy to the named individual as follows:

\_\_\_\_\_ on (date) \_\_\_\_\_; or

I returned the subpoena unexecuted because: \_\_\_\_\_  
\_\_\_\_\_.

Unless the subpoena was issued on behalf of the United States, or one of its officers or agents, I have also  
tendered to the witness fees for one day's attendance, and the mileage allowed by law, in the amount of  
\$ \_\_\_\_\_.

I declare under penalty of perjury that this information is true.

Date: \_\_\_\_\_

\_\_\_\_\_  
*Server's signature*

\_\_\_\_\_  
*Printed name and title*

\_\_\_\_\_  
*Server's address*

Additional information regarding attempted service, etc:

## Federal Rule of Civil Procedure 45 (c), (d), (e), and (g) (Effective 12/1/13)

### c) Place of Compliance.

**(1) For a Trial, Hearing, or Deposition.** A subpoena may command a person to attend a trial, hearing, or deposition only as follows:

(A) within 100 miles of where the person resides, is employed, or regularly transacts business in person; or

(B) within the state where the person resides, is employed, or regularly transacts business in person, if the person

- (i) is a party or a party's officer; or
- (ii) is commanded to attend a trial and would not incur substantial expense.

**(2) For Other Discovery.** A subpoena may command:

(A) production of documents, electronically stored information, or tangible things at a place within 100 miles of where the person resides, is employed, or regularly transacts business in person; and

(B) inspection of premises at the premises to be inspected.

### (d) Protecting a Person Subject to a Subpoena; Enforcement.

**(1) Avoiding Undue Burden or Expense; Sanctions.** A party or attorney responsible for issuing and serving a subpoena must take reasonable steps to avoid imposing undue burden or expense on a person subject to the subpoena. The court for the district where compliance is required must enforce this duty and impose an appropriate sanction—which may include lost earnings and reasonable attorney's fees—on a party or attorney who fails to comply.

### (2) Command to Produce Materials or Permit Inspection.

(A) *Appearance Not Required.* A person commanded to produce documents, electronically stored information, or tangible things, or to permit the inspection of premises, need not appear in person at the place of production or inspection unless also commanded to appear for a deposition, hearing, or trial.

(B) *Objections.* A person commanded to produce documents or tangible things or to permit inspection may serve on the party or attorney designated in the subpoena a written objection to inspecting, copying, testing, or sampling any or all of the materials or to inspecting the premises—or to producing electronically stored information in the form or forms requested. The objection must be served before the earlier of the time specified for compliance or 14 days after the subpoena is served. If an objection is made, the following rules apply:

- (i) At any time, on notice to the commanded person, the serving party may move the court for the district where compliance is required for an order compelling production or inspection.
- (ii) These acts may be required only as directed in the order, and the order must protect a person who is neither a party nor a party's officer from significant expense resulting from compliance.

### (3) Quashing or Modifying a Subpoena.

(A) *When Required.* On timely motion, the court for the district where compliance is required must quash or modify a subpoena that:

- (i) fails to allow a reasonable time to comply;
- (ii) requires a person to comply beyond the geographical limits specified in Rule 45(c);
- (iii) requires disclosure of privileged or other protected matter, if no exception or waiver applies; or
- (iv) subjects a person to undue burden.

(B) *When Permitted.* To protect a person subject to or affected by a subpoena, the court for the district where compliance is required may, on motion, quash or modify the subpoena if it requires:

(i) disclosing a trade secret or other confidential research, development, or commercial information; or

(ii) disclosing an unretained expert's opinion or information that does not describe specific occurrences in dispute and results from the expert's study that was not requested by a party.

(C) *Specifying Conditions as an Alternative.* In the circumstances described in Rule 45(d)(3)(B), the court may, instead of quashing or modifying a subpoena, order appearance or production under specified conditions if the serving party:

(i) shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship; and

(ii) ensures that the subpoenaed person will be reasonably compensated.

### (e) Duties in Responding to a Subpoena.

#### (1) Producing Documents or Electronically Stored Information.

These procedures apply to producing documents or electronically stored information:

(A) *Documents.* A person responding to a subpoena to produce documents must produce them as they are kept in the ordinary course of business or must organize and label them to correspond to the categories in the demand.

(B) *Form for Producing Electronically Stored Information Not Specified.* If a subpoena does not specify a form for producing electronically stored information, the person responding must produce it in a form or forms in which it is ordinarily maintained or in a reasonably usable form or forms.

(C) *Electronically Stored Information Produced in Only One Form.* The person responding need not produce the same electronically stored information in more than one form.

(D) *Inaccessible Electronically Stored Information.* The person responding need not provide discovery of electronically stored information from sources that the person identifies as not reasonably accessible because of undue burden or cost. On motion to compel discovery or for a protective order, the person responding must show that the information is not reasonably accessible because of undue burden or cost. If that showing is made, the court may nonetheless order discovery from such sources if the requesting party shows good cause, considering the limitations of Rule 26(b)(2)(C). The court may specify conditions for the discovery.

#### (2) Claiming Privilege or Protection.

(A) *Information Withheld.* A person withholding subpoenaed information under a claim that it is privileged or subject to protection as trial-preparation material must:

- (i) expressly make the claim; and
- (ii) describe the nature of the withheld documents, communications, or tangible things in a manner that, without revealing information itself privileged or protected, will enable the parties to assess the claim.

(B) *Information Produced.* If information produced in response to a subpoena is subject to a claim of privilege or of protection as trial-preparation material, the person making the claim may notify any party that received the information of the claim and the basis for it. After being notified, a party must promptly return, sequester, or destroy the specified information and any copies it has; must not use or disclose the information until the claim is resolved; must take reasonable steps to retrieve the information if the party disclosed it before being notified; and may promptly present the information under seal to the court for the district where compliance is required for a determination of the claim. The person who produced the information must preserve the information until the claim is resolved.

#### (g) Contempt.

The court for the district where compliance is required—and also, after a motion is transferred, the issuing court—may hold in contempt a person who, having been served, fails without adequate excuse to obey the subpoena or an order related to it.

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
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DONALD LOUGHRAN and LINDA  
LOUGHRAN, Individually and as  
Next Friend to M.L., A Minor  
vs.

KIA MOTORS AMERICA, INC. and  
KIA MOTORS CORPORATION

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CIVIL ACTION NO. 3:17-CV-1632

DIRECT QUESTIONS TO BE PROPOUNDED TO  
THE WITNESS, CUSTODIAN OF RECORDS FOR:  
LORENTZ AUTOMOTIVE

1. State your full name and occupation, address and telephone number.

ANSWER: (NAME) Reanne Lorentz  
(OCCUPATION) Owner of Lorentz Automotive, Inc  
(ADDRESS) [REDACTED]  
(TELEPHONE #) [REDACTED]

2. In response to the Subpoena Duces Tecum you received, have you produced ANY AND ALL RECORDS, INCLUDING BUT NOT LIMITED TO, AGREEMENTS, REPAIRS AND OR MAINTENANCE RECORDS, INSPECTION REPORTS, WORK ORDERS, INVOICES, BILLS, ESTIMATES, PHOTOGRAPHS, RECEIPTS, AND EVERY SUCH RECORD, INCLUDING BUT NOT LIMITED TO, THOSE EXISTING IN ELECTRONIC OR MAGNETIC FORM, PERTAINING TO A 2013 KIA SOUL; VIN: KNDJT2A63D7537209?

ANSWER: I have attached all records in Lorentz Automotive's possession that are responsive to the Subpoena in hand Copy.

3. Are you able to identify these records and/or photographs as the originals or true and correct copies of the originals?

ANSWER: yes



4. Were these records and/or photographs made and kept in the regular course of your business?

ANSWER: Yes

5. In the regular course of business of your practice, business, or institution, did the person who signed the records and/or photographs either have personal knowledge of the entries shown on the records and/or photographs, or obtain the information to make the entries from the sources who have such personal knowledge?

ANSWER: Yes

6. Were such memoranda or documents and/or photographs then transmitted to your files and thereafter maintained under your care, supervision, direction, custody or control as custodian of this facility?

ANSWER: Yes

7. Were the memoranda or documents that were transmitted to your files original entries on the part of the Custodian or other employee or member of the staff of this facility?

ANSWER: Yes

8. Were the records and/or photographs prepared at or about the time of the events and conditions they record?

ANSWER: Yes

9. Were these records and/or photographs kept as described in the previous questions?

ANSWER: Yes

10. Please examine copies of the original requested records and/or photographs. Have you produced records and/or photographs for attachment to this Deposition?

ANSWER: Yes

11. Has anything been removed from or altered in the original records and/or photographs before making these copies?

ANSWER: No

12. If you have answered the previous question yes, please state fully and precisely what alterations were made in the original records and/or photographs and attach copies of every document removed from the original records.

ANSWER: N/A

13. In the event that no records and/or photographs can be found, are there document archives (i.e. microfiche) or document retention policies which explain their absence? If so, please identify who has knowledge of those archives or policies of the above named facility.

ANSWER: I believe that all responsive records are attached.

14. Are you aware that it may be necessary to subpoena you or your employer to court at the time of trial if you have not provided all of the papers, notes, documents, records, general correspondence, or other tangible items of any kind pertaining to the above named individual to the Notary Public taking your deposition?

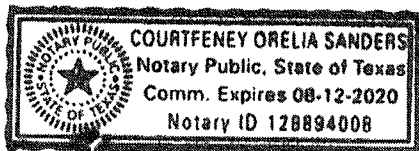
ANSWER: (circle one) YES/NO

I, Rance Lantz (Custodian of Record), do swear or affirm that my answers to the above questions are the truth, the whole truth and nothing but the truth, so help me God.

Rance Lantz  
Custodian of Record

I, Courtney Orelia Sanders, A Notary Public, do hereby certify the above Custodian was duly sworn and the non-stenographic recording of this Written Deposition is a true record of the Custodian testimony.

GIVEN UNDER MY HAND AND SEAL OF OFFICE, THIS 28 DAY OF November 28, 2017.



Courtney Orelia Sanders 128894008  
SIGNATURE OF NOTARY PUBLIC IN AND FOR THE STATE OF TX  
NAME OF NOTARY PUBLIC TYPED OR PRINTED  
My commission expires: 08-12-2020

Lorentz Automotive Inc.  
600 N. Mill St.  
Lewisville, Tx. 75057

LORENTZ AUTOMOTIVE INC  
600 N MILL ST  
LEWISVILLE, TX, 75057  
972-353-2100

Date: 11/21/2016 10:58:34 AM PST

Transaction ID: 1123652142

Ref ID: 115073

Purchase Order #:

Card Type: Visa

Account: \*\*\*\*\*

Auth:

Amount: \$93.84

Signature

I HANEY/JOHN cardholder agree to pay the above amount according to the card issuer agreement.  
(Merchant agreement if credit voucher)

Thank You!

We would like to take a moment and THANK YOU for your business!

**Lorentz Automotive, Inc**  
600 N Mill Street  
Lewisville, TX 75057  
(972) 353-2100

Invoice #: 0115073  
Date: 11/21/2016

Page 1 of 1

|                      |                           |                             |
|----------------------|---------------------------|-----------------------------|
| Customer: [REDACTED] | VEHICLE: 2013 Kia Soul    | Service Advisor: [REDACTED] |
| Address: [REDACTED]  | ENGINE: 4-1999 2.0L DOHC  |                             |
| City: [REDACTED]     | V.I.N.: KNDJT2A63D7537209 | TYPE:                       |
| Phone 1: [REDACTED]  | LICENSE: 63D5017          |                             |
| Ext: CELL            | MILEAGE: 49188            |                             |

Payments:

VISA, \$93.84, on 11/21/16

CardNo: [\*\*\*\*\*8529], AuthorizationNo: [015913]

| Job Description  | Parts | Labor | Job Total |
|--|-------|-------|-----------|
| SA [REDACTED] is your PERSONAL SERVICE ADVISOR, I Want to THANK YOU for allowing me this opportunity of assisting you with your vehicle repair experience. |       |       | \$0.00    |
| BDB PERFORM A USED VEHICLE INSPECTION  |       | 89.95 | 89.95     |
| BDB 1.NEEDS FRONT BRAKES ALMOST METAL TO METAL   |       |       | \$0.00    |
| 2. ALL WIPER BLADES ARE TORN 3. MISSING FILLER NECK FOR WASHER FLUID   |       |       |           |
| 4. ALTINATOR CONNECTOR IS MESSED UP 5. DRIVERS FRONT CORNER HAS BEEN HIT   |       |       |           |
| HARD 6. NO SPARE TIRE OR TOOLS   |       |       |           |
| 7. AIR BAG LIGHT IS ON FOR AIR BAG CODES B1670, B1322, B1101, B1102, B1111, B1112, B1319. 8. FRONT TIRES LEANING IN  |       |       |           |
| RECOMMENDATIONS  |       |       |           |
| 1. FRONT BRAKES AND TURN ROTORS 2. ALTINATOR PIGTAIL   |       |       |           |
| 3. ALL WIPERS 4. WIPER FLUID FILL NECK   |       |       |           |
| 5. FRONT END ALIGNMENT   |       |       |           |

Notice Pursuant to #70,001, Texas Property Code: I am the person or agent acting on behalf of the person, who is obligated to pay for the repair of the motor vehicle subject to the repair contract. I understand that this vehicle is subject to repossession in accordance with #9,503, Texas Business and Commerce Code, if a written order for payment for repair on the vehicle is stopped, dishonored because of insufficient funds, no funds, or because the drawer or maker of the order has no account or the account on which it is drawn has been closed. All warranties, expressed or implied are only valid at our facility. Work completed elsewhere will void Lorentz warranty.

X \_\_\_\_\_


Repair Order Notes:

Customer Signature

Date: \_\_\_\_\_

|               |         |
|---------------|---------|
| Total Parts   | 0.00    |
| Total Labor   | 89.95   |
| Sublet        | 0.00    |
| Shop Supplies | 3.60    |
| Subtotal      | 93.55   |
| Other Fees    | 0.00    |
| Sales Tax     | 0.29    |
| Total Invoice | \$93.84 |
| Paid          | \$93.84 |
| Total Due     | \$0.00  |
| Paid By:      | VISA    |
| Pay Ref:      |         |

|                        |  |                  |
|------------------------|--|------------------|
| VEHICLE: 2013 KIA SOUL |  | WO#: 0115073     |
| ENGINE:                |  | PO #             |
| TYPE:                  |  | Date: 11/21/2016 |
| TRANS:                 |  | Time: 10:47 am   |
| COLOR:                 |  | Fleet/Unit#:     |

|                           |                   |  |
|---------------------------|-------------------|--|
| MILEAGE: 49,188           | LICENSE: 63 D5617 | <br>0115073 |
| Mileage out: :            |                   |  |
| V.I.N.: KMPJT2A63D7537209 |                   |  |

| Parts |             |             |       | Labor                             |       |        |
|-------|-------------|-------------|-------|-----------------------------------|-------|--------|
| Qty   | Part Number | Description | Price | Tech Labor Description            | Hours | Charge |
|       |             |             |       | PERFORM A USED VEHICLE INSPECTION | 1.00  | 89.95  |

\* Needs Front Brakes (2-3mm left)

\* All wipers are tearing

\* ~~Washer~~ Missing fill neck for the washer fluid

\* Alt connector is messed up (Need a pigtail connector)

\* Driver Front corner has been hit before (No front end play)

\* No spare tire or spare tire tools

\* Airbag light is on

B1670 Crash recorded in full stage (Frontal Replace. SRSCM) Present  
B1322 WCS (weight classification system) Defect  
B1101 Batt voltage High  
B1102 Batt voltage Low

History

B1111 Ignition Voltage High  
B1112 Ign. Volt Low  
\* B1319 OLS Require weight check

History

- Needs spare tire / with tools

Rec - Front Brakes

- Alt pigtail connector

- All wipers

- Wiper fluid Reservoir fill neck

- Driver Front Has been hit (Needs alignment)

Front Rotors specs

|       |       |
|-------|-------|
| 1.025 | 1.033 |
|-------|-------|

Writer: [REDACTED]

# VEHICLE INSPECTION SHEET

11/21/2016 10:47:15AM

\* Customer: [REDACTED]

VEHICLE 2013 KIA SOUL

WO#: 0115073

ENGINE:

2WD 4WD AWD

V.I.N.:

LICENSE:

ABS: Frt

Rear

N/A

Doors: 2 3 4 5 SW Hatch PU

TYPE:

TMS Yes

No

Tire Size

ST. Inspect.

| 1. Improve Performance                     |                      | 2. Preventive Maintenance |  | 3. System Failure        |                 |
|--|----------------------|---------------------------|--|--------------------------|-----------------|
| <b>INTERIOR</b>                            |                      |                           |  |                          |                 |
| <input type="checkbox"/>                   | Warning Lights Set   | <input type="checkbox"/>  | Check Engine - ABS - Battery - Oil - SIF | <input type="checkbox"/> |                 |
| <input type="checkbox"/>                   | Lighting             | <input type="checkbox"/>  | Ok Replace                               | <input type="checkbox"/> |                 |
| <input type="checkbox"/>                   | Horn                 | <input type="checkbox"/>  | Ok Service                               | <input type="checkbox"/> |                 |
| <b>EXTERIOR</b>                            |                      |                           |  |                          |                 |
| <input type="checkbox"/>                   | Headlamps            | <input type="checkbox"/>  | Ok Replace                               | <input type="checkbox"/> |                 |
| <input type="checkbox"/>                   | Tail Lights          | <input type="checkbox"/>  | Ok Replace                               | <input type="checkbox"/> |                 |
| <input type="checkbox"/>                   | Brake Lights         | <input type="checkbox"/>  | Ok Replace                               | <input type="checkbox"/> |                 |
| <input type="checkbox"/>                   | Turn Signal          | <input type="checkbox"/>  | Ok Replace                               | <input type="checkbox"/> |                 |
| <input type="checkbox"/>                   | Reverse Lights / Oil | <input type="checkbox"/>  | Ok Replace                               | <input type="checkbox"/> |                 |
| <input type="checkbox"/>                   | Wiper Blades         | <input type="checkbox"/>  | Ok Replace                               | <input type="checkbox"/> | Torn / worn out |
| <input type="checkbox"/>                   | Hub Caps             | <input type="checkbox"/>  | Ok Replace                               | <input type="checkbox"/> |                 |
| <input type="checkbox"/>                   | Body Condition       | <input type="checkbox"/>  | Ok Damaged                               | <input type="checkbox"/> | Driver side     |
| <b>UNDERHOOD</b>                           |                      |                           |  |                          |                 |
| <input type="checkbox"/>                   | Hood Rods            | <input type="checkbox"/>  | Ok Replace                               | <input type="checkbox"/> |                 |
| <input type="checkbox"/>                   | Filters              | <input type="checkbox"/>  | Ok Replace                               | <input type="checkbox"/> |                 |
| <input type="checkbox"/>                   | Battery Cables       | <input type="checkbox"/>  | Ok Service                               | <input type="checkbox"/> |                 |
| <input type="checkbox"/>                   | Battery              | <input type="checkbox"/>  | Ok Replace                               | <input type="checkbox"/> |                 |
| <input type="checkbox"/>                   | Belts                | <input type="checkbox"/>  | Ok Replace                               | <input type="checkbox"/> |                 |
| <input type="checkbox"/>                   | Tensioner            | <input type="checkbox"/>  | Ok Replace                               | <input type="checkbox"/> |                 |
| <input type="checkbox"/>                   | Hoses                | <input type="checkbox"/>  | Ok Replace                               | <input type="checkbox"/> |                 |
| <input type="checkbox"/>                   | Cooling Sys / Leaks  | <input type="checkbox"/>  | Ok Service                               | <input type="checkbox"/> | No leaks        |
| <input type="checkbox"/>                   | P.S. Leaks           | <input type="checkbox"/>  | Ok Service                               | <input type="checkbox"/> |                 |
| <input type="checkbox"/>                   | Oil Leaks            | <input type="checkbox"/>  | Ok Service                               | <input type="checkbox"/> |                 |
| <b>FLUID LEVELS &amp; FLUID CONDITIONS</b> |                      |                           |  |                          |                 |
| <input type="checkbox"/>                   | Engine Oil           | <input type="checkbox"/>  | Ok Add                                   | <input type="checkbox"/> | Change          |
| <input type="checkbox"/>                   | PS Fluid             | <input type="checkbox"/>  | Ok Add                                   | <input type="checkbox"/> | Flush           |
| <input type="checkbox"/>                   | Trans Fluid          | <input type="checkbox"/>  | Ok Add                                   | <input type="checkbox"/> | Flush           |
| <input type="checkbox"/>                   | Coolant              | <input type="checkbox"/>  | Ok Add                                   | <input type="checkbox"/> | Flush           |
| <input type="checkbox"/>                   | Brake Fluid          | <input type="checkbox"/>  | Ok Add                                   | <input type="checkbox"/> | Flush           |
| <input type="checkbox"/>                   | Diff. Fluid          | <input type="checkbox"/>  | Ok Add                                   | <input type="checkbox"/> | Flush           |
| <input type="checkbox"/>                   | Trans Case Fluid     | <input type="checkbox"/>  | Ok Add                                   | <input type="checkbox"/> | Flush           |
| <input type="checkbox"/>                   | Washer Fluid         | <input type="checkbox"/>  | Ok Add                                   | <input type="checkbox"/> |                 |
| <b>MAINTENANCE</b>                         |                      |                           |  |                          |                 |
| <input type="checkbox"/>                   | 30/60/90/120         | <input type="checkbox"/>  | Ok Service                               | <input type="checkbox"/> |                 |
| <input type="checkbox"/>                   | Fuel Filter          | <input type="checkbox"/>  | Ok Replace                               | <input type="checkbox"/> |                 |
| <input type="checkbox"/>                   | Injector Service     | <input type="checkbox"/>  | Ok Service                               | <input type="checkbox"/> | Flush           |
| <input type="checkbox"/>                   | Throttle Body        | <input type="checkbox"/>  | Ok Service                               | <input type="checkbox"/> | Cleaning        |
| <input type="checkbox"/>                   | Mass Air             | <input type="checkbox"/>  | Ok Service                               | <input type="checkbox"/> | Cleaning        |
| <input type="checkbox"/>                   | Ignition System      | <input type="checkbox"/>  | Ok Diagnose                              | <input type="checkbox"/> |                 |
| <b>BRAKES</b>                              |                      |                           |  |                          |                 |
| <input type="checkbox"/>                   | Master Cylinder      | <input type="checkbox"/>  | Ok Service                               | <input type="checkbox"/> | Front           |
| <input type="checkbox"/>                   | Front Pads           | <input type="checkbox"/>  | Ok Replace                               | <input type="checkbox"/> | Min. 2-3mm      |
| <input type="checkbox"/>                   | Front Rotors         | <input type="checkbox"/>  | Ok Turn / Rep                            | <input type="checkbox"/> | Dis.            |
| <input type="checkbox"/>                   | F. Caliper/Slides    | <input type="checkbox"/>  | Ok                                       | <input type="checkbox"/> | L               |
| <input type="checkbox"/>                   | Front Hardware       | <input type="checkbox"/>  | Ok Replace                               | <input type="checkbox"/> | R               |
| <input type="checkbox"/>                   | R. Shoes/Pads        | <input type="checkbox"/>  | Ok Replace                               | <input type="checkbox"/> | Rear            |
| <input type="checkbox"/>                   | R. Drum/Rotor        | <input type="checkbox"/>  | Ok Turn / Rep                            | <input type="checkbox"/> | Min. 8mm        |
| <input type="checkbox"/>                   | R. Wh. Cyl / Caliper | <input type="checkbox"/>  | Ok Replace                               | <input type="checkbox"/> | Max.            |
| <input type="checkbox"/>                   | R. Axle Seals        | <input type="checkbox"/>  | Ok L / R                                 | <input type="checkbox"/> | L               |
| <input type="checkbox"/>                   | R. Hardware          | <input type="checkbox"/>  | Ok Replace                               | <input type="checkbox"/> | R               |
| <input type="checkbox"/>                   | Emergency Brake      | <input type="checkbox"/>  | Ok Service                               | <input type="checkbox"/> | Shoe size:      |
| <b>TIRE SIZE</b>                           |                      |                           |  |                          |                 |
| <input type="checkbox"/>                   | Alignment            | <input type="checkbox"/>  | N/A                                      | <input type="checkbox"/> | Rec.            |
| <input type="checkbox"/>                   | Balance              | <input type="checkbox"/>  | N/A                                      | <input type="checkbox"/> | Rec.            |
| <input type="checkbox"/>                   | Wheel Lock Key       | <input type="checkbox"/>  | Ok                                       | <input type="checkbox"/> | NA              |
| <input type="checkbox"/>                   | Tire Wear            | <input type="checkbox"/>  | Ok                                       | <input type="checkbox"/> | Wear            |
| <input type="checkbox"/>                   | Left Front           | <input type="checkbox"/>  | #  | <input type="checkbox"/> | /32             |
| <input type="checkbox"/>                   | Right Front          | <input type="checkbox"/>  | #  | <input type="checkbox"/> | /32             |
| <input type="checkbox"/>                   | Right Rear           | <input type="checkbox"/>  | #  | <input type="checkbox"/> | /32             |
| <input type="checkbox"/>                   | Left Rear            | <input type="checkbox"/>  | #  | <input type="checkbox"/> | /32             |
| <b>SUSPENSION &amp; DRIVELINE</b>          |                      |                           |  |                          |                 |
| <input type="checkbox"/>                   | Struts               | <input type="checkbox"/>  | Ok Replace                               | <input type="checkbox"/> |                 |
| <input type="checkbox"/>                   | Shocks               | <input type="checkbox"/>  | Ok Replace                               | <input type="checkbox"/> |                 |
| <input type="checkbox"/>                   | Rack & Pinion        | <input type="checkbox"/>  | Ok Service                               | <input type="checkbox"/> |                 |
| <input type="checkbox"/>                   | CV Axle/Boot         | <input type="checkbox"/>  | Ok Replace                               | <input type="checkbox"/> |                 |
| <input type="checkbox"/>                   | Suspension/ Drive    | <input type="checkbox"/>  | Ok Replace                               | <input type="checkbox"/> |                 |
| <b>UNDERBODY</b>                           |                      |                           |  |                          |                 |
| <input type="checkbox"/>                   | Axle Shaft Seals     | <input type="checkbox"/>  | Ok Replace                               | <input type="checkbox"/> |                 |
| <input type="checkbox"/>                   | Pinion Seal          | <input type="checkbox"/>  | Ok Replace                               | <input type="checkbox"/> |                 |
| <input type="checkbox"/>                   | Oil Leaks            | <input type="checkbox"/>  | Ok Diagnose                              | <input type="checkbox"/> |                 |
| <input type="checkbox"/>                   | Trans Leaks          | <input type="checkbox"/>  | Ok Diagnose                              | <input type="checkbox"/> |                 |
| <input type="checkbox"/>                   | U-Joints             | <input type="checkbox"/>  | Ok Replace                               | <input type="checkbox"/> |                 |
| <input type="checkbox"/>                   | Exhaust              | <input type="checkbox"/>  | Ok Replace                               | <input type="checkbox"/> |                 |
| <b>TEST DRIVE</b>                          |                      |                           |  |                          |                 |
| <input type="checkbox"/>                   | Warning Lights       | <input type="checkbox"/>  | Ok Diagnose                              | <input type="checkbox"/> | Air bag         |
| <input type="checkbox"/>                   | Starting             | <input type="checkbox"/>  | Ok Diagnose                              | <input type="checkbox"/> |                 |
| <input type="checkbox"/>                   | Shifting             | <input type="checkbox"/>  | Ok Diagnose                              | <input type="checkbox"/> |                 |
| <input type="checkbox"/>                   | Vibration            | <input type="checkbox"/>  | Ok Diagnose                              | <input type="checkbox"/> |                 |
| <input type="checkbox"/>                   | Running              | <input type="checkbox"/>  | Ok Diagnose                              | <input type="checkbox"/> |                 |

Bad  
OK

Worn out  
OK

No leaks