

CURRICULUM VITAE of John R. Manning, Sc.D., Mechanical Engineer

Registered Professional Engineer (Mechanical) No. M14466, California

Education

Bachelor of Engineering (with Highest Honors), Yale University, 1960

Master of Science (Mechanical Engineering), Massachusetts Institute of Technology, 1964

Doctor of Science (Mechanical Engineering), Massachusetts Institute of Technology, 1967

Dr. John Manning provides forensic engineering design consulting services to attorneys, insurance companies and others concerned with settling disputes in which the engineering design of equipment and systems is an issue.

Most of Dr. Manning's practice is concerned with machinery, equipment and systems used in the workplace which are involved in personal injury accidents which, in turn, lead to product liability litigation. Dr. Manning also has been retained in many so-called California Labor Code Section 4558 lawsuits (power press exception to the workers' compensation exclusive remedy rule). A small fraction of his work is with consumer products and a few of the disputes concern property damage, contracts or patents / trade secrets.

Excluded from his practice are: highway vehicles, aircraft, portable ladders and snow ski equipment. The highway vehicle exclusion does not include truck-mounted equipment such as aerial lifts or cranes which are operated when the vehicle is stationary.

Dr. Manning's forensic practice was established in 1969. Over the forty intervening years, he has become knowledgeable about many forensic experts in his own and other disciplines. Referrals are gladly given without charge to client.

Work Experience

- 1969 to Present In private practice as engineering consultant to attorneys and others concerned with settling disputes involving mechanical engineering design issues; participation in more than 1000 cases, 700 depositions and 90 trial appearances
- 1995 to Present Chairman and Vice President, V-Soft, Inc., San Jose, CA
- Various Dates Lecturer (1974-75, 1976-77), Senior Lecturer (1981, 1984, 1985, 1988), Design Division, Mechanical Engineering Dept., Stanford University
- 1977 to 1979 Associate Dean of Engineering, Associate Professor of Aerospace & Mechanical Engineering, Boston University
- 1975 to 1976 Manager, Product Design, Processor Systems (India) Pvt. Ltd., Bangalore, India
- 1974 to 1975 Research Associate, Integrated Circuits Laboratory, Electrical Engineering Department, Stanford University
- 1967 to 1975 Engineering consultant in private practice with industrial firms and inventors
- 1967 to 1974 Assistant Professor, Design Division, Mechanical Engineering Department, Stanford University
- 1962 to 1967 Member, Senior Member, Engineering Scientist, Technical Staff, Aerospace Systems Division, R.C.A. Corporation, Burlington, MA
- 1961 to 1962 Foreman, Making Synthetic Granules Department, Procter & Gamble Company, Long Beach, CA

SCHEDULE OF FEES AND EXPENSES

RETAINER REQUIRED PRIOR TO COMMENCEMENT OF WORK: \$6000 EACH CASE

- A. Retainer will be held in trust and applied to the final invoice at conclusion of case. Any residual moneys will be promptly refunded.
- B. Invoices for current fees and expenses will be submitted on a regular basis.
- C. Invoices shall be paid within 30 days from date of billing.
- D. Delinquent invoices will be charged against retainer. All work will be discontinued until full amount of \$6000 retainer has been replaced.
- E. ALL INVOICES (past and current) MUST BE PAID IN FULL PRIOR TO APPEARANCE TO TESTIFY AT TRIAL.
- F. Client's payment of retainer shall be construed as indication of acceptance of all terms and conditions of this Schedule of Fees and Expenses.

EXPERT SERVICES: \$600 PER HOUR

ALL CATEGORIES OF WORK INCLUDING CASE PREPARATION, TRAVEL, DEPOSITION TESTIMONY, AND TRIAL APPEARANCES; NO MINIMUMS FOR ANY CATEGORY EXCEPTING \$600 MINIMUM CHARGE FOR ACCEPTING RETENTION AND OPENING FILE.

SUPPORT SERVICES:

TECHNICAL ASSISTANT	\$75 PER HOUR
RESEARCH ASSISTANT	\$75 PER HOUR
OFFICE SERVICES	\$60 PER HOUR

EXPENSES:

ALL DIRECT EXPENSES TO BE REIMBURSED AT ACTUAL COST.