

ACCIDENT CAUSE & ANALYSIS

1 PHILLIPS LANE
CHESTER SPRINGS, PA 19425
610-827-7535
FAX: 610-827-0882

ACCIDENTEXPERT@COMCAST.NET
WWW.ACAEXPERT.COM

REPLY TO CAPE MAY OFFICE



NEW JERSEY OFFICE
32 CANTERBURY WAY
CAPE MAY, NJ 08204
484-716-1190

October 3, 2016

CASE

Kennedy vs. Pollock, et al Case

SCOPE OF ENGAGEMENT

In the matter of Kennedy vs. Pollock, et al case, I have been asked to analyze my field investigation and case file information to determine within a reasonable degree of scientific certainty the cause and/or causes of this accident involving Mrs. Kennedy on November 17, 2014.

PROFESSIONAL CREDENTIALS AND QUALIFICATIONS

I am the owner of Accident Cause and Analysis located at 1 Phillips Lane Chester Springs Pennsylvania. I have been conducting accident reconstruction services for over 30 years encompassing over 2000 traffic accidents. I have been qualified and have testified in State and Federal courts proceedings in the areas of accident reconstruction. My curriculum vitae, which lists my work experience, academic degrees, and professional associations is attached to this report (Appendix A).

ACCIDENT EVENT SUMMARY

This accident at issue can be summarized as follows. On November 17, 2014 at approximately 3:44 p.m., a 2011 Ford Jitney bus, operated by Mr. Frederick Pollock, was traveling eastbound within the outer travel lane on Pacific Avenue approaching the intersection of Rhode Island Avenue in Atlantic City, Atlantic County, New Jersey.

Mr. Pollock's Jitney bus came to a stop on Pacific Avenue near the intersection of Rhode Island Avenue and first discharged Mr. Kennedy. Mrs. Kennedy, an elderly passenger, then slowly followed her husband off the Jitney bus. Mr. Pollock without assuring Mrs. Kennedy was safely on the sidewalk pulled forward from a stopped position and ran over Mrs. Kennedy. The collision caused serious injuries to Mrs. Kennedy.

INFORMATION CONSIDERED

In arriving at the opinions set forth in this report, I have relied upon my education experience, expertise and the analyses described within this report. I have conducted my accident reconstruction based on the information listed below:

- ✓ Scene inspection conducted on March 8, 2015
- ✓ An inspection of the 2011 Ford E450 Super Duty Jitney bus on December 11, 2015
- ✓ Atlantic City Police accident report #14-129221
- ✓ Security video tape taken from the subject Jitney bus
- ✓ Deposition of Mrs. Hilda Kennedy taken on June 28, 2016
- ✓ Plaintiff's and Defendant's Answer to Interrogatories questions
- ✓ Plaintiff's Complaint

SUMMARY OF FACTS

A. Scene Assessment

I conducted a complete scene inspection on March 8, 2015. The scene inspection and roadway markings indicated that no pertinent design changes have occurred to this roadway from the period of November 17, 2014 to March 8, 2015 (See Appendix B & C).

1. Pacific Avenue, approaching the intersection of Rhode Island Avenue, was a divided roadway that traveled in a west/eastbound directions. The roadway had the proper lane markings for the travel lanes as seen in photograph #1.



Photograph #1: Pacific Avenue (eastbound) approaching the intersection of Rhode Island Avenue (Writer's photograph)

2. Pacific Avenue, approaching the intersection of Rhode Island Avenue, had the following design features:
 - An approximate level elevation for eastbound traffic.
 - The straight roadway was constructed with worn surface in adequate repair.
 - There was no designated Jitney bus stop posted for eastbound traffic at the collision location.

3. Pacific Avenue, approaching the intersection of Rhode Island Avenue, had the following lane dimensions:

Lane 1 (outer eastbound)	=	9.5'
Lane 2 (inner eastbound)	=	10.1'
Lane 3 (inner westbound)	=	10.8'
Lane 4 (outer westbound)	=	9.9'

4. The aerial view of Pacific Avenue before the intersection of Rhode Island Avenue can be seen in photograph #2.



Photograph #2: Pacific Avenue at the intersection of Rhode Island Avenue (Google Earth photograph)

B. 2011 Ford Jitney Bus Assessment

The 2011 Ford E450 super duty Jitney bus assessment is based on my inspection conducted on December 11, 2015. The exterior view of 2011 Ford Jitney bus (VIN # 1FDFE4FSXBDA39231) can be seen in photographs #3-4.



Photograph #3: Frontal view of the 2011 Ford Jitney bus
(Writer's photograph)



Photograph #4: Side view of the 2011 Ford Jitney bus
(Writer's photograph)

C. Atlantic City Police Accident Report

Review of the Atlantic City Police accident report # 14-129221 indicated the following:

- The accident event occurred November 17, 2014 at 3:44 p.m. on Pacific Avenue near the intersection of Rhode Island Avenue in Atlantic City, New Jersey.
- Mr. Frederick Pollock was driving a 2011 Jitney Bus. Mrs. Hilda Kennedy was an involved pedestrian.
- The police made the following observations regarding the accident:
 - The posted speed limit on Pacific Avenue was 25 MPH.
 - The accident happened on Pacific Avenue near the intersection of Rhode Island Avenue.
 - There was heavy rain and wind at the time of the accident.
 - The Jitney Association has video coverage of the passenger exiting the bus.

OBSERVATIONS AND ANALYSIS

Observation #1: My testing of the Jitney bus exterior side mirrors was conducted on December 11, 2015 during an inspection. The purpose of the evaluation was to determine Mr. Pollock's available side sightline and visibility toward Mrs. Kennedy as she departs the bus and eventually being run over by back tandem wheels. An overview of the bus can be seen on photograph #5.



Photograph #5: Angle/Side view of 2011 Ford Jitney bus

The bus passenger side was equipped with “bus” type mounted mirrors consisted of a rectangular type design mounted on the right front quarter panel. The single rectangular “spot” mirror started approximately 4’8” above ground level. Located above the rectangular “spot” mirror was a larger rectangular mirror positioned approximately 5’0” feet and extending to 5’10” above ground level. There was also a small circular mirror mounted on the larger rectangular mirror. All mirrors can be seen on photographs #6-7.



Photograph #6: Passenger side mirrors on the 2011 Ford Jitney bus
(Writer's photograph)



Photograph #7: Passenger side mirrors on the 2011 Ford Jitney bus
(Writer's photograph)

Mr. Pollock using the properly positioned side exterior mirrors would have a clear sightline of Mrs. Kennedy as she was in position after departing the bus onto Pacific Avenue as seen in photograph #8.



Photograph #8: Passenger side mirrors on the 2011 Ford Jitney bus
(Writer's photograph)

Observation #2: Mr. Pollock, driving the 2011 Ford Jitney bus, had a clear and unobstructed view of Mrs. Kennedy as she slowly walked down the steps and departed his bus as seen in the security video tape and depicted by photograph #9.



Photograph #9: Sightline of Mr. Pollock toward Mrs. Kennedy departing bus (Writer's photograph)

Observation #3: Based on the exterior bus measurements, Mr. Pollock pulled his Jitney bus forward approximately 104.5 inches (8.7 feet) after Mrs. Kennedy departed the bus and eventually ran her over with the rear tandem wheels.

Observation #4: The following is an applicable Atlantic City regulation that was violated by Mr. Pollock in the operation of his jitney bus the day of the accident ultimately leading ultimately leading to the serious injuries of Mrs. Kennedy.

Atlantic City Ordinance Section 233-41 (O) which provides as follows:

“It shall be unlawful for any jitney to stop for the purpose of receiving or discharging passengers within 10 feet from the intersection of streets unless in the process of legally passing another jitney, and in all cases such embarking and disembarking passengers shall be at a point as near the curb as may be practicable.”

The video of the jitney bus clearly showed that it was nowhere near the curb for Pacific Avenue when discharging Mrs. Kennedy. When Mrs. Kennedy fell, she was positioned between the jitney bus and the curb due to the large gap between the jitney and the curb.

The positioning of the jitney bus on Pacific Avenue allowed her to fall under the jitney bus. Had Mrs. Kennedy fallen with the jitney bus adjacent to the curb, she would have simply fallen into the side of the jitney bus and onto the curb and not underneath the jitney bus.

Observation #5: The following are applicable Commercial Driver's License (CDL) recommendations that Mr. Pollock did not follow during the operation of his jitney bus the day of the accident ultimately leading to the serious injuries of Mrs. Kennedy.

**Commercial Driver's License Manual
Section-2 Seeing 2.4**

2.4 – Seeing To be a safe driver you need to know what's going on all around your vehicle. Not looking properly is a major cause of accidents.

2.4.2 – Seeing to the Sides and Rear It's important to know what's going on behind and to the sides. Check your mirrors regularly. Check more often in special situations.

Observation #6: The security video tape along with audio showed the Jitney bus traveling eastbound on Pacific Avenue approaching the collision location prior to the intersection of Rhode Island Avenue.

The Jitney bus came to a stop within the outer travel lane of Pacific Avenue before the intersection of Rhode Island Avenue in an attempt to discharge passengers during inclement weather. Mr. Kennedy (Mrs. Kennedy's husband) first departs the Jitney bus at approximately 15:41:42 hours with Mrs. Kennedy walking behind him as seen in photograph #10.



Photograph #10: Video tape time event 15:41:42 hours

Mrs. Kennedy, walking with an unsteady walking pattern, followed her husband and started to depart the Jitney bus following her husband at approximately 15:41:51 hours as seen in photograph #11.



Photograph #11: Video tape time event 15:41:51 hours

The Jitney bus, operated by Mr. Pollock, pulled forward approximately 8.7 and ran over Mrs. Kennedy at approximately 15:42:10 hours with Mr. Kennedy shouting at Mr. Pollock as seen photograph #12.



Photograph #12: Video tape time event 15:42:10 hours

CONCLUSIONS

My conclusions, contained within the body of this report, are based upon materials reviewed, my education, training and experience, and are held by me within a reasonable degree of scientific certainty and may be summarized as follows:

1. A 2011 Ford Jitney bus, operated by Mr. Pollock was traveling eastbound within the outer travel lane of Pacific Avenue approaching the intersection of Rhode Island Avenue in Atlantic City, NJ. Mr. Pollock's Jitney bus came to a stop on Pacific Avenue near the intersection of Rhode Island Avenue and first discharged Mr. Kennedy. Mrs. Hilda Kennedy, an elderly passenger, then slowly followed her husband off the bus. Mr. Pollock without assuring Mrs. Kennedy was safely on the sidewalk pulled forward from a stopped position and ran over Mrs. Kennedy.
2. Mr. Pollock had a clear and unobstructed sightline toward the location of Mrs. Kennedy after she departed the bus. He failed to view Mrs. Kennedy before pulling forward and running her over.
3. By using his properly positioned passenger side exterior mirrors, Mr. Pollock would have a clear and unobstructed sightline toward Mrs. Kennedy. Mr. Pollock failed to properly use his exterior mirrors causing the collision.

4. Mr. Pollock failed to comply with Atlantic City Ordinance Section 233-41 by failing to position his jitney at a point as near the curb as practicable in allowing passengers to disembark. This failure caused there to be a substantial gap between the curb and the jitney thereby creating the opportunity for a person, such as Mrs. Kennedy, to become lodged between the jitney and the curb."
5. Mr. Pollock, while operating his 2011 Ford Jitney bus, did not follow applicable Commercial Driver's License (CDL) recommendations during the operation of his Jitney bus the day of the accident.
6. The sole cause of this collision was the inattentive driving actions of Mr. Pollock ultimately leading to the serious injuries of Mrs. Kennedy.
7. Mrs. Kennedy acted reasonably in her efforts to depart the Jitney bus in a safe manner.

I remain available to supplement this accident reconstruction report as additional information is received.

Respectfully,



Frank Costanzo
Senior Accident Reconstructionist/ACA

EXHIBIT

B

Appendix A

Curriculum Vitae

FRANK M. COSTANZO

Senior Accident Reconstructionist at
Accident Cause & Analysis LLC

SUMMARY

Traffic Accident Reconstructionist Specialist expert with over 2000 full-scale collision investigations and reconstructions. Certified court expert with over 30 years' experience in collision investigations and reconstructions, scene documentation/diagramming, 3D laser scanning, truck and vehicle computer downloads and forensic vehicle inspections.

PROFESSIONAL EXPERIENCE

ACCIDENT CAUSE & ANALYSIS, Chester Springs, PA
(1995-Present)

Collision Reconstructionist Specialist

Expert for cases involving criminal and civil venues through the United States

- Documentation of scene evidence utilizing computer scene mapping hardware and software
- Utilizing computer reconstructions concepts to calculate collision impact speeds by using scene and vehicle damage data
- Calculating travel and impact speeds in pedestrian, motorcycle, vehicle(s) and commercial vehicle collisions
- CDR and DDEC downloads of vehicles and tractor-trailers
- 3D laser scanning of scenes and vehicles
- Application of federal and state motor vehicle regulations
- Computer animation
- Conducting forensic mechanical commercial vehicle inspections
- Providing litigation support services including expert testimony, accident animation, mural-size diagrams and maps and research

DELAWARE COUNTY FATAL ACCIDENT TEAM, Delaware County, PA
(2009-2011) Collision Reconstruction Specialist

Providing expert services for Delaware County District Attorney's Office

- A member of the immediate response team consisting of collision reconstructionist working in conjunction with the Delaware County District Attorney's Office. This unit is responsible for the complete reconstruction of fatal collisions in a designated region along with providing training of police officers.

Philadelphia Office:

1 Phillips Lane
Chester Springs, PA 19425
T: (610) 827-7535
Email: accidentexpert@comcast.net
Website: www.acaexpert.com

New Jersey Office:

32 Canterbury Way
Cape May, NJ 08204
T: (484) 716-1190

Pittsburgh Office:

132 Mason Drive
Glenshaw, PA 15116
T: (484) 716-1190

**INSTITUTE OF LAW ENFORCEMENT EDUCATION (ILEE), Harrisburg, PA
(1990-2005) Specialized Law Enforcement Instructor**

Senior Instructor for classes involving motor vehicle reconstructions

- *Instruct police officers in the fundamentals of traffic collision, collision investigation and reconstruction, computer aided diagramming, occupant kinematics, seat belt analysis, air bag deployments and child restraints*
- *Develop, present and write course curriculums at annual conferences*

**CHILDREN'S NATIONAL MEDICAL CENTER, Washington, DC
(2000-2004)**

Collision Reconstruction Specialist, National Highway Traffic Safety Administration (NHTSA) Crash Injury Research and Engineering Network (CIREN)

Subcontractor conducting collision reconstructions for motor vehicle collisions involving restrained children less than 16 years of age

- *Utilizing computer reconstructions by incorporating vehicle crash deformation, trajectory, and impact scenarios with collision simulations*
- *Calculating speed changes (ΔV) and energy dissipation using measured vehicle damage crush profiles*
- *Conducting biomechanical analysis and interior injury causation studies by detailing crash dynamics and its effect on children during automotive collisions*
- *Evaluating the child restraint system design and possible misuse with its relationship to injury causation and/or prevention*

**UNIVERSITY OF MEDICINE & DENTISTRY OF NEW JERSEY (UMDNJ),
Newark, NJ (2000-2004)**

Collision Reconstruction Specialist, National Highway Traffic Safety Administration (NHTSA) Crash Injury Research and Engineering Network (CIREN)

Subcontractor conducting collision reconstructions for motor vehicle collisions involving restrained and unrestrained adults

- *Utilizing computer reconstructions by incorporating vehicle crash deformation, trajectory, and impact scenarios with collision simulations*
- *Calculating speed changes (ΔV) and energy dissipation using measured vehicle damage crush profiles*
- *Conducting biomechanical analysis and interior injury causation studies by detailing crash dynamics and its effect on adults during automotive collisions*
- *Evaluating the occupant restraint system design and possible misuse with its relationship to injury causation and/or prevention*

**MONTGOMERY COUNTY FATAL ACCIDENT UNIT, Montgomery County, PA
(2000-2002) Collision Reconstruction Specialist**

Providing expert services for cases involving criminal venues throughout Montgomery County

- *A member of the immediate response team consisting of collision reconstructionist working in conjunction with the Montgomery County District Attorney's Office and the Montgomery County Detectives. This unit was responsible for the complete reconstruction of fatal collisions in a designated region.*

**NATIONAL HIGHWAY TRAFFIC SAFETY ADMINISTRATION,
Washington, DC (1983-1995)**

Collision Reconstruction Specialist, National Highway Traffic Safety Administration (NHTSA) National Accident Sampling System Program (NASS)

Subcontractor conducting collision reconstructions for motor vehicle collisions involving restrained and unrestrained adults and children

- *Measuring and documenting component intrusion(s) and integrity loss as it relates to mechanism of injuries*
- *Utilizing computer reconstructions by incorporating vehicle crash deformation, trajectory, and impact scenarios with collision simulations*
- *Calculating speed changes (ΔV) and energy dissipation using measured vehicle damage crush profiles*
- *Conducting biomechanical analysis and interior injury causation studies by detailing crash dynamics and its effect on adults and children during automotive collisions*
- *Evaluating the occupant restraint system design and possible misuse with its relationship to injury causation and/or prevention*
- *Conducting defect investigations and special studies regarding inadvertent air bag deployments, and interior component failures of manual and automatic occupant protection systems*

ACADEMIC EDUCATION AND CERTIFICATIONS

- BS Degree, Safety Science, Indiana University of PA, 1982
- Certified Traffic Instructor, Pennsylvania Department of Education, 1990
- Certified Child Passenger Safety Installer, National Safe Kids Organization, 2000

CONTINUING EDUCATION CREDITS

The following courses in collision investigation and reconstruction were part of a programs developed and offered by the Institute of Police Technology and Management (IPTM) and North Florida University and Traffic Institute of Police Services (TIPS)

- *Accident Investigation*, IPTM, FL
- *Accident Reconstruction*, IPTM, FL
- *Tire Forensics*, IPTM, FL
- *Motorecycle Accident Investigation*, IPTM, FL
- *Commercial Vehicle Accident Investigation*, IPTM, FL
- *Computer Scene Diagramming*, TIPS, Breezewood, PA
- *Commercial Vehicle Accident Investigation and Reconstruction*, National Transportation Safety Board (NTSB) and TIPS, Breezewood, PA
- *Crash Investigation and Reconstruction Technology & Best Practices*, US Department of Transportation, Webinar, December 2015

PAPERS AND SPECIAL PROJECTS

The following papers, research and special projects were written and developed for the legal community, private organizations, Traffic Institute of Police Services (TIPS) and the Crash Injury Research and Engineering Network (CIREN)

- Atlantic County Bar Association, *Effective Use of an Accident Reconstruction Expert*, CLE credits January 2016
- Cumberland Bar Association, *Tractor Trailer Investigation and Reconstruction*, CLE credits November 2015
- TASA Webinar, *Tractor Trailer Investigation and Reconstruction*, CLE credits November 2015
- Lehigh Valley Bar Association, *Tractor Trailer Investigation and Reconstruction*, CLE credits September 2015
- Monroe Bar Association, *Advance Technology in Accident Investigation and Reconstruction*, CLE credits November 2014
- Lackawanna Bar Association, *Advance Technology in Accident Investigation and Reconstruction*, CLE credits October 2014
- New Jersey State Bar Association, *Accident Investigation and Reconstruction: An Essential Crash Course*, CLE credits August 2013
- Lancaster Bar Association, *Accident Investigation and Reconstruction for Attorney*, CLE credits February 2013
- Lehigh Bar Association, *Accident Investigation and Reconstruction for Attorney*, CLE credits January 2013

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- TASA Webinar, *Accident Investigation and Reconstruction for Attorneys*, September 2012 (CLE credits)
- Pennsylvania Bar Institute *Accident Investigation and Reconstruction for Attorney*, July 2012 CLE credits
- Lehigh Bar Association, *Bio-Mechanical Injury Analysis Low Speed Injury Analysis*, September 2011 CLE credits
- TASA Webinar, *Tractor-Trailer Accident Reconstruction for Attorneys*, February 2010 and November 2012 (CLE credits)
- Lancaster Bar Association, *Bio-Mechanical Low Speed Injury Analysis Injury Analysis*, September 2011 CLE credits
- Bucks County Bar Association, *Tractor Trailer Investigation and Reconstruction*, August 2010 CLE credits
- Berks County Bar Association, *Tractor Trailer Investigation and Reconstruction*, September 2009 CLE credits
- Lancaster Bar Association, *Tractor-Trailer Accident Reconstruction for Attorneys*, April 2009 CLE credits
- Lehigh Bar Association, *Tractor-Trailer Accident Reconstruction for Attorneys*, April 2009 CLE credits
- Monroe County Bar Association, *Pedestrian and Motorcycle Investigation and Reconstruction for Attorneys*, September 2009 CLE credits
- Berks County Bar Association, *Pedestrian and Motorcycle Investigation and Reconstruction for Attorneys*, September 2008 CLE credits
- Bucks County Bar Association, *Pedestrian and Motorcycle Investigation and Reconstruction for Attorneys*, July 2008 CLE credits
- Lancaster Bar Association, *Pedestrian and Motorcycle Investigation and Reconstruction for Attorneys*, July 2008 CLE credits
- Lancaster Bar Association, *Motor Vehicle Liability and Defects*, September 2008 CLE credits
- CAPE Education, *Accident Investigation and Reconstruction for Attorney*, January 2007-2008 CLE credits
- Chester County Bar Association, *Accident Investigation and Reconstruction for Attorney*, January 2007 CLE credits
- Monroe County Bar Association, *Accident Investigation and Reconstruction for Attorney*, September 2007 and 2012 CLE credits
- Lehigh Bar Association, *Pedestrian and Motorcycle Investigation and Reconstruction for Attorneys*, August 2007 CLE credits
- Berks County Bar Association, *Motor Vehicle Liability and Defects*, September 2006 CLE credits
- Bucks County Bar Association, *Accident Investigation and Reconstruction for Attorneys*, October 2006 CLE credits
- Berks County Bar Association, *Accident Investigation and Reconstruction for Attorneys*, CLE credits February 2005

- Monroe County Bar Association, *Accident Investigation and Reconstruction for Attorney*, CLE credits January 2005
- Northampton County Bar Association, *Accident Investigation and Reconstruction for Attorney*, CLE credits February 2005
- Cumberland County Bar Association, *Accident Investigation and Reconstruction for Attorney*, CLE credits February 2005
- Centre County Bar Association, *Accident Investigation and Reconstruction for Attorney*, CLE credits March 2005
- Lehigh Bar Association, *Accident Investigation and Reconstruction for Attorney*, CLE credits March 2005 and December 2012
- Delaware Trial Lawyers Association, *Accident Investigation and Reconstruction for Attorney Annual Conference* March 2005
- Montgomery Bar Association, *Accident Investigation and Reconstruction for Attorney*, CLE credits August 2005
- Camden County Bar Association, *Accident Investigation and Reconstruction for Attorney*, CLE credits October 2005
- *The Benefits of Booster Seats*, Children's National Medical Center, NHTSA CIREN quarterly presentation
- *Pediatric Injuries from Mismatched Cases*, Children's National Medical Center, NHTSA CIREN quarterly presentation
- *Kids in Crashes: The Real World Consequence of Child Restraint Misuse*, Children's National Medical Center, NHTSA CIREN quarterly presentation
- *Hide and Seek: Occult Injuries in Children*, Children's National Medical Center, NHTSA CIREN quarterly presentation
- *An Analysis of Pediatric Head Trauma*, Children's National Medical Center, NHTSA CIREN quarterly presentation
- Developed the "Low Speed Injury Analysis" course and presented an abstract at the annual Highway Safety Conference, Traffic Institute of Police Services
- Developed and coordinated friction field testing at the annual Highway Safety Conference, Traffic Institute of Police Services
- Developed and coordinated controlled car vs. motorcycle crash test at the annual Highway Safety Conference, Traffic Institute of Police Services
- Assisted in the development of "Computer Accident Reconstruction" course and presented an abstract at the annual Highway Safety Conference, Traffic Institute of Police Services
- Developed and coordinated controlled car crash test at the annual Highway Safety Conference, Traffic Institute of Police Services

PROFESSIONAL CONTINUING LEGAL EDUCATION PRESENTATIONS

- Atlantic County Bar Association (1)
- Berks County Bar Association (4)
- Bucks County Bar Association (3)
- Camden County Bar Association (2)
- CAPE Education (10)
- Carbon County Bar Association (1)
- Centre County Bar Association
- Chester County Bar Association (2)
- Cumberland County Bar Association (2)
- Delaware Trial Lawyers Association (2)
- Lackawanna Bar Association (1)
- Lancaster Bar Association (7)
- Lehigh Bar Association (10)
- Monroe County Bar Association (4)
- Montgomery County Bar Association
- New Jersey State Bar Association (1)
- Northampton County Bar Association (3)
- Technical Advisory Service for Attorneys (6)
- Pennsylvania Bar Institute (1)

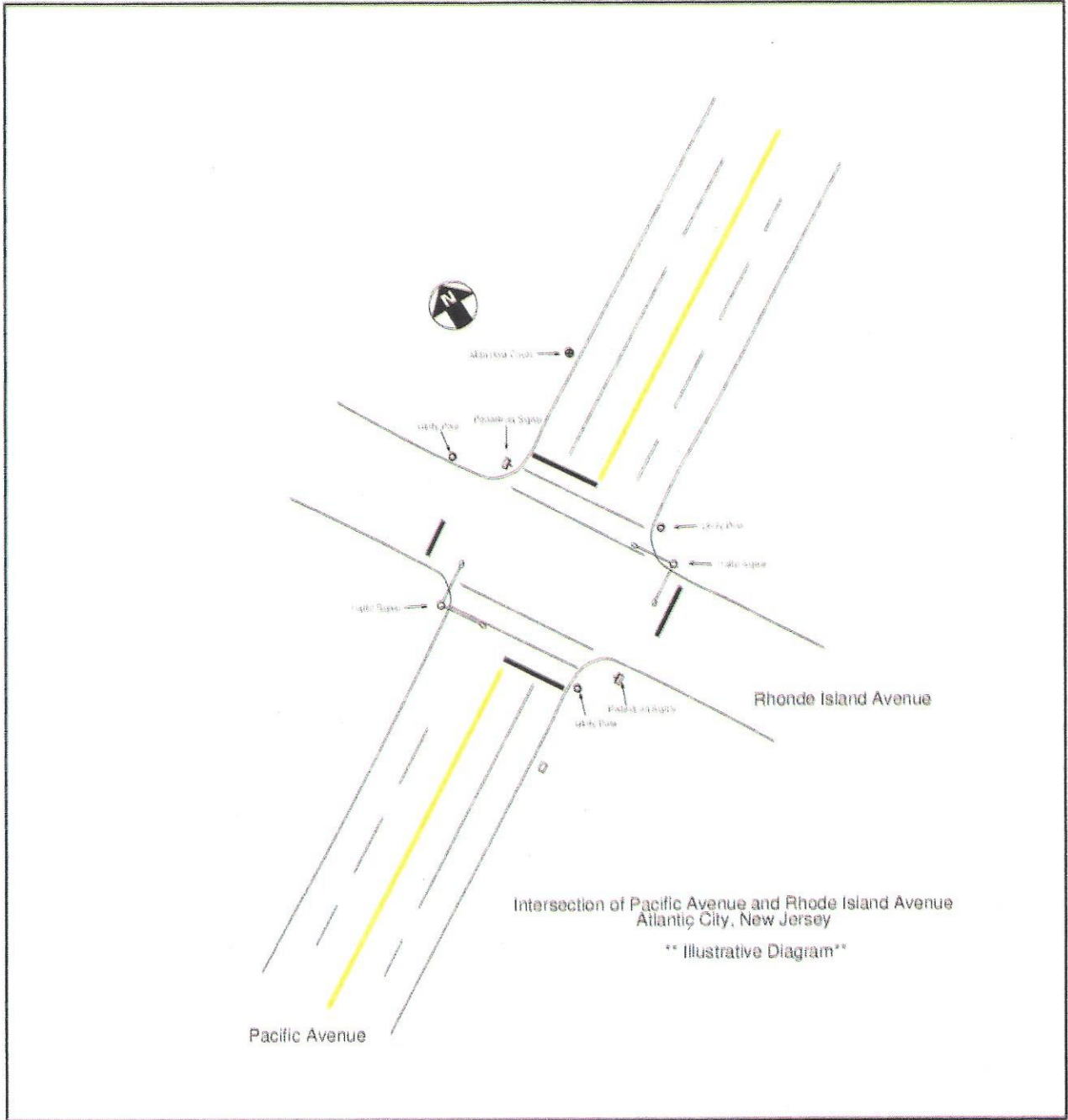
PROFESSIONAL ASSOCIATIONS/ORGANIZATIONS

- *Society of Automotive Engineers (S.A.E)*
- *International Network of Collision Reconstructionist (INCR)*
- *National Association of Professional Accident Reconstructionist (NAPARS)*
- *American Society of Forensic Sciences (AAFS)*

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Appendix B

Scene Diagram



Appendix C

Scene Photographs

Kennedy vs. Pollock, et al



Photograph #1: Travel path eastbound within the outer travel lane on Pacific Avenue approaching the intersection of Rhode Island Avenue

Kennedy vs. Pollock, et al



Photograph #2: Travel path eastbound within the outer travel lane on Pacific Avenue approaching the intersection of Rhode Island Avenue

Kennedy vs. Pollock, et al



Photograph #3: Travel path eastbound within the outer travel lane on Pacific Avenue approaching the intersection of Rhode Island Avenue

Kennedy vs. Pollock, et al



Photograph #4: Overview of Intersection and Collision Location

Kennedy vs. Pollock, et al



Photograph #5: Overview of Intersection and Collision Location