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# **EXHIBIT F**

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
(HOUSTON DIVISION)

KAREN TAYLOR,

Plaintiff,

v.

TASER INTERNATIONAL, INC.,

Defendant.

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CASE NO.: 4:17-cv-00673-GHM

**PLAINTIFF’S SUPPLEMENT TO CONTENTIONS INTERROGATORY**

As directed by the Court, this supplemental/amended answer to TASER’s “contentions” interrogatory details the very simple “design defect” theory in this case. It truly is simple. By intentional design, the X2 is underpowered. Or, to use products liability-speak, because of the lower designed “charge” of this stun gun it is “unreasonably dangerous” as designed for the police officers that depend on it for self-protection.

The entire premise of TASER stun guns is that they emit an electrical charge that is strong enough to cause “neuromuscular incapacitation.” The M26 and X26 likely had sufficient power to accomplish this goal. (Thus, both are “safer alternative designs” within the meaning of the Texas Products Liability Act). The X2 does not.

By way of illustration, the original, inadequate, under-powered AIR TASER device put out only 70 microcoulombs. In his 2007 expert opinion report in the *Mann* case in Georgia, Rick Smith acknowledged that the 70 microcoulomb “pulse intensity from the AIR TASER 34000 was found to be *insufficient to cause any motor neuron mediated stimulation of muscle,*” or, in other words, to result in adequate neuromuscular incapacitation [NMI]. See also Illustration No. 17 of that same expert report.

This was written in the context of TASER’s claim that the “182 microcoulombs total rectified charge delivered” by the M26 was superior to the AIR TASER’s 70 microcoulombs.

By contrast, the rated output of the X2 is only 63 microcoulombs (plus or minus 9) and the Gray's Engineering report on Karen Taylor's weapon seems to confirm that this particular gun was actually on the lower end of the design specs.

There are, of course, many other aspects of the science that could be discussed. Your experts, and ours, can discuss watts, and volts, and RMS ratings, and Ohm's Law, and x/y graphs with amplitude on the vertical axis and time of exposure on the horizontal, and "wave forms", etc. *ad nauseam*. They can use various metaphors, like Mr. Smith's "faucet" or hose examples, to teach the jury about power output. And they can use graphic illustrations comparing the "area" under the wave form graphs to make their points and their arguments, similar to Illustration No. 17 in the referenced expert report.

But, at the end of the day, the long and short of it is that — for reasons that experts for both sides know very well — TASER deliberately chose to reduce the power output of the X2, and, correspondingly, to withhold that information from police departments and officers. The result — what happened with Officer Karen Taylor and suspect Florence Walker — was exactly what one would expect from sending an officer into the field with an underpowered stun gun.

Respectfully submitted,

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Certificate of Service

I hereby certify that on July 19, 2017, Plaintiff's Supplement to Contentions Interrogatory were emailed to the following counsel of record:

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