

1 backing up any vehicle. Those limitations are not
2 from having physical obstructions that block our
3 sight. Those limitations are from how we are built
4 as human beings, our anatomy, and how our brains
5 work as human beings.

6 Some, of course, manufacturers use
7 more than one technology. They might have back-up
8 beepers and mirrors, for example. Whatever they
9 choose, it's the manufacturer's job to figure out
10 what's going to work best in their machine and make
11 it practical so it operates to make their machine
12 safe.

13 The manufacturer in this case knew
14 about these problems for decades. They knew there
15 was a large number of serious lawn mower back-over
16 injuries, and they knew that they were particularly
17 happening to young children, and they knew about the
18 human limitations when backing up.

19 The manufacturer knew that operators
20 of riding lawn mowers sometimes needed to back up a
21 little bit to reposition before going forward again.
22 And the manufacturer knew that the operators of
23 riding lawn mowers often had the blades on when they
24 repositioned the mowers (inaudible).

25 I expect you will hear testimony in