

IN THE IOWA DISTRICT COURT FOR CERRO GORDO COUNTY

SHANE ZAHN

PLAINTIFF

v.

CASE NO. CVCV070807

MILLS FLEET FARM GROUP, LLC

DEFENDANT

VIDEOTAPED DEPOSITION OF CHARLES GAVAN DUFFY

Taken February 1, 2019

commencing at 8:52 a.m.

4206 South J.B. Hunt Drive, Suite 200

Rogers, Arkansas

REPORTED BY: SHEILA B. ALEXANDER, CCR, RMR, CRR
Certified Court Reporter

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I N D E X

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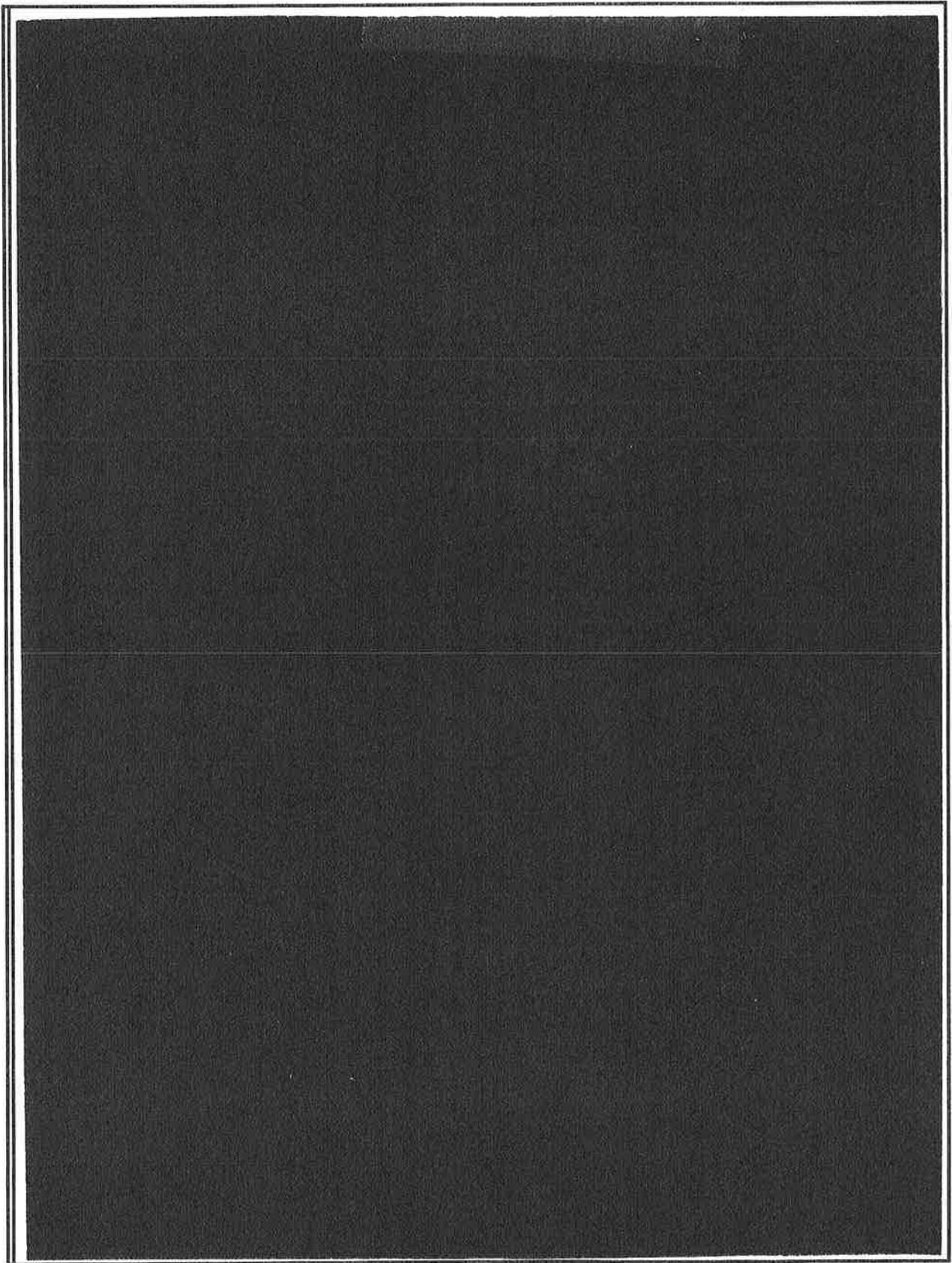
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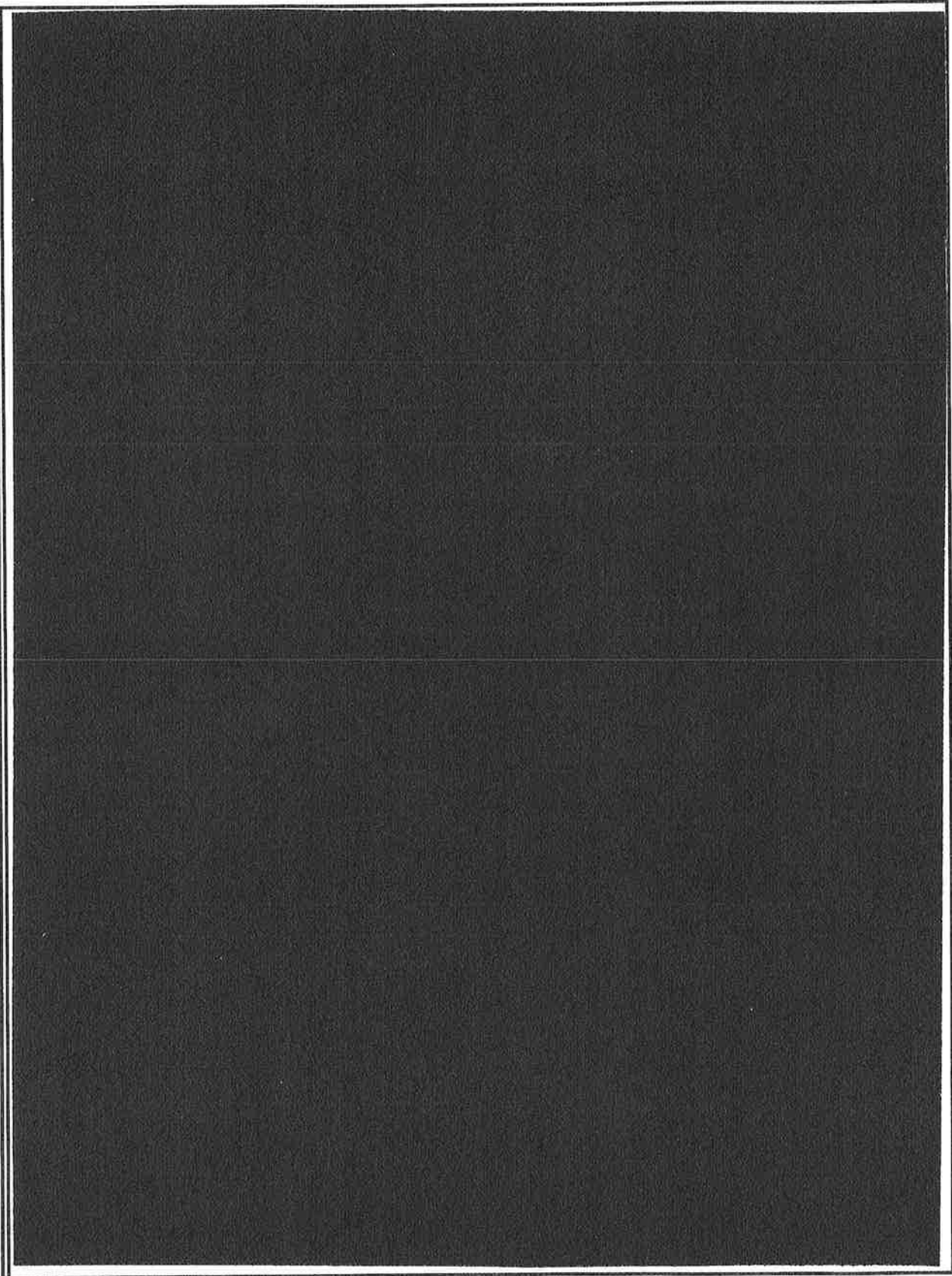
(NOTE: All exhibits were previously marked for
identification.)

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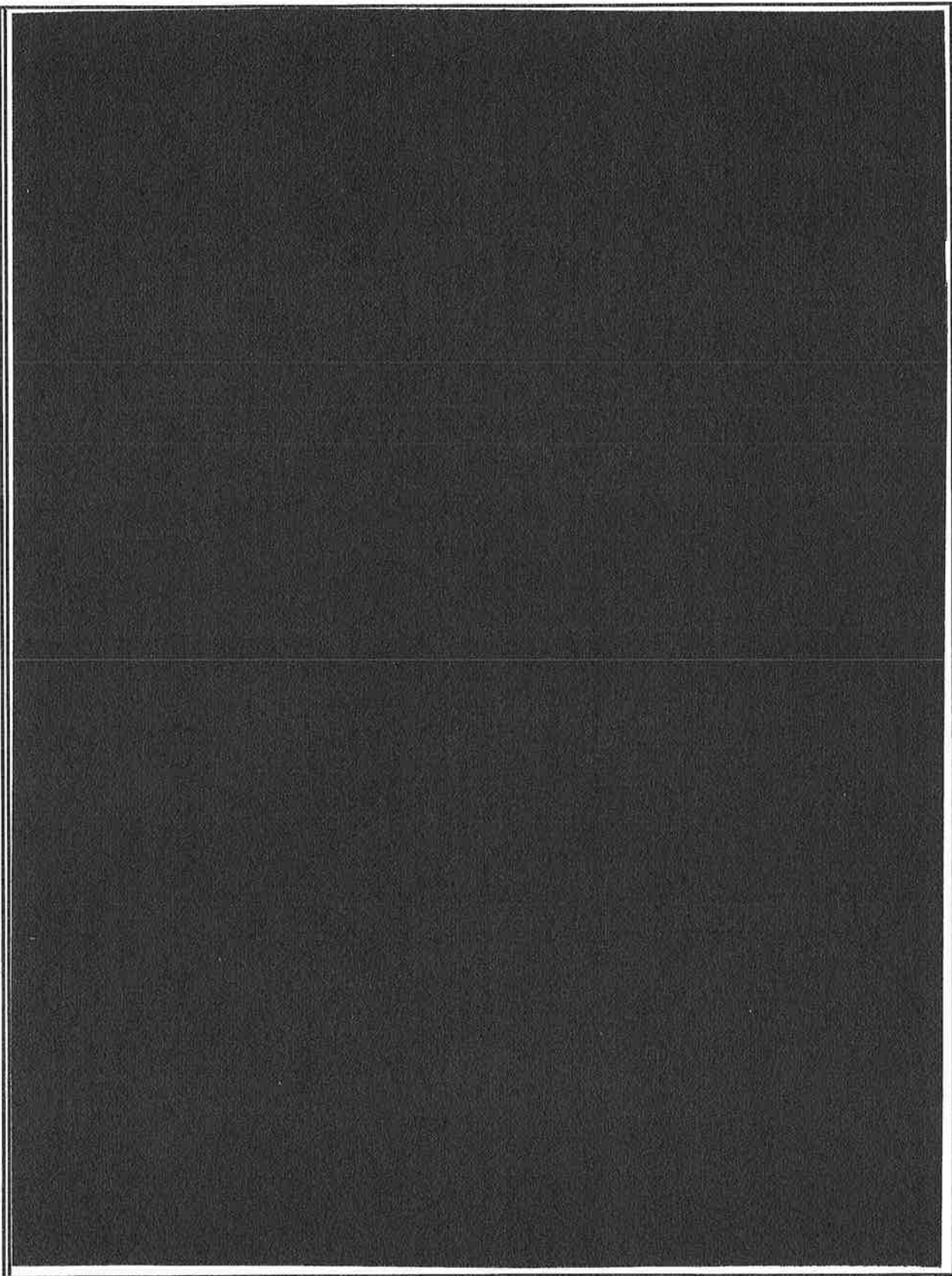


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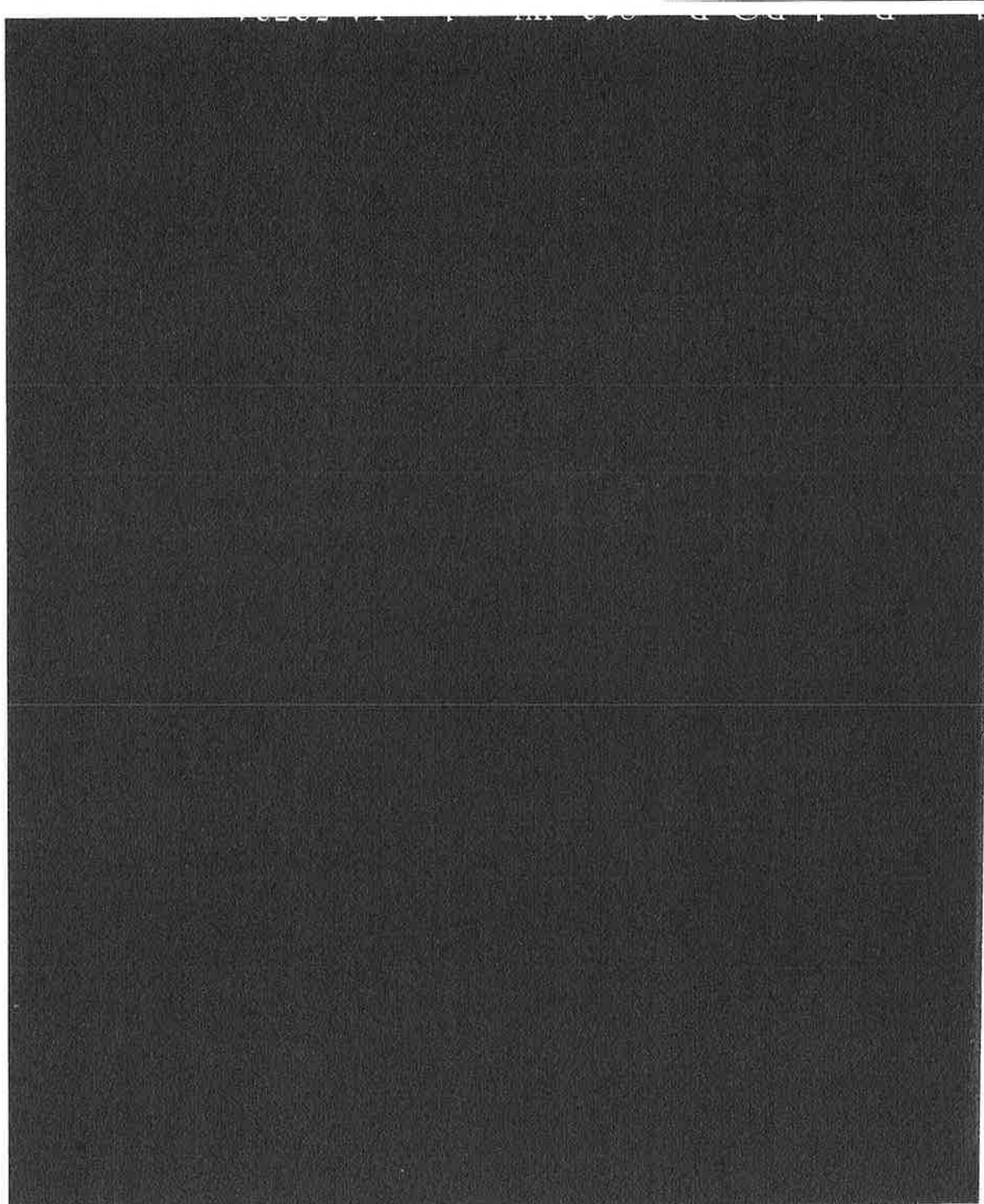
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CHARLES GAVAN DUFFY,
having been first duly cautioned and sworn by me to
testify to the truth, the whole truth, and nothing but the

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1 truth, testified on his oath as follows, to wit:

2 EXAMINATION

3 BY MR. SWANSON:

4 Q. Good morning, Mr. Duffy. This is Chad Swanson.

5 Would you please state your name for the record and
6 spell it for the convenience of our judge and jury?

7 A. Yes. My name is Charles Gavan Duffy. Did you say
8 spell it? I'm sorry.

9 Q. Would you, please? Yes.

10 A. Yeah. Charles, C-h-a-r-l-e-s, Gavan, G-a-v-a-n, and
11 Duffy, D-u-f-f-y.

12 Q. And where are you physically located right now?

13 A. Rogers, Arkansas.

14 Q. And for -- for those of us in Iowa that may not be
15 familiar with Arkansas, where -- where in the state would
16 that be?

17 A. That's the very northwest corner of Arkansas.

18 Q. And I'll state that we, as counsel for the parties
19 to the case, are in our respective offices here in Iowa.
20 I would have loved to have been there. I had plans to
21 travel there; but unfortunately, the weather this week
22 forced a change of plan.

23 Where do you work presently, Mr. Duffy?

24 A. I work for Assembled Products Corporation.

25 Q. For purposes of this case, have you traveled at all

1 to the state of Iowa?

2 A. No, I have not.

3 Q. In the summer of 2018, Mr. Duffy, did I approach you
4 and your employer, Assembled Products Corporation, to
5 retain your services on -- in this case?

6 A. About an affidavit?

7 Q. Yes. And did you prepare an affidavit for us?

8 A. Yes.

9 Q. Okay. Can you give us your date of birth and tell
10 us how old that makes you today?

11 A. May 24th, 1970, and it makes me 48 years old.

12 Q. And would you briefly summarize for us what
13 education you've obtained after graduation from high
14 school?

15 A. I have a bachelor's degree in marketing management
16 from the University of Arkansas.

17 Q. And when did you obtain that degree?

18 A. 1994.

19 Q. Are you presently employed; and if so, by whom?

20 A. I am. I'm presently employed by Assembled Products
21 Corporation.

22 Q. And how long have you been employed by Assembled
23 Products Corporation?

24 A. Twenty-four years.

25 Q. And where is that company located, sir?

1 A. In Rogers, Arkansas.

2 Q. It might be easier for today's deposition just to
3 call the company APC. Can we do that?

4 A. That's fine, sir.

5 Q. What's your present job -- job title with the
6 company?

7 A. I am senior vice president of sales and marketing.

8 Q. And obviously, I think that those of us up here in
9 Iowa have probably never heard of -- of APC or Assembled
10 Products Corporation, but can you explain what it does?

11 A. Yes. We are the -- Assembled Products Corporation
12 has three brand lines, including the Mart Cart line of
13 electric shopping carts and shopping assistance products;
14 we have Spray Master Technologies, which is commercial
15 pressure cleaning systems; and then we have the Jotto Desk
16 brand line, which is mobile office accessories and fleet
17 services.

18 Q. So would I be correct in saying that this is a
19 company that manufactures and then sells different types
20 of consumer or industrial products as you've just
21 mentioned?

22 A. Yes.

23 Q. Okay. How long has APC been manufacturing and
24 selling electric shopping carts?

25 A. Since 1983. Thirty-six years.

1 Q. Okay. And you mentioned just a moment ago the words
2 "Mart Cart." Is that a brand name, or how -- what would
3 you --

4 A. That is --

5 Q. -- characterize that?

6 A. That is a brand name, yes. That's one of the brand
7 names for Assembled Products.

8 Q. And when we talk about manufacturing, are -- are
9 these devices like the Mart Carts and these other
10 products, do you actually build them in Arkansas?

11 A. We build them in Arkansas.

12 Q. Does APC sell those electric carts, these Mart
13 Carts, directly to customers like Mills Fleet Farm?

14 A. Yes.

15 Q. Would APC sell Mart Carts like that to individual
16 consumers if -- if -- let's say I wanted to buy a Mart
17 Cart from you. Could I do that?

18 A. Not -- not the same -- no, not that model.

19 Q. Okay. That model that we're talking about or that
20 we'll be talking about today is just simply available to
21 large-scale customers like retail stores.

22 A. Correct.

23 Q. You mentioned your -- your title with the company,
24 and you're in sales and marketing. What -- what -- what
25 do you do on a routine basis for that job, sir?

1 A. Well, I -- I manage our sales team, our -- our sales
2 and order-entry team and interact with customers in the
3 field to promote our products.

4 Q. Okay. How long have you been overseeing, in your
5 tenure with the company -- I think it was 24 or some
6 years. How long have you been overseeing the -- the Mart
7 Cart brand?

8 A. I've been -- I've -- overseeing for the last -- as
9 my current title for the last four years. I've been in a
10 sales capacity with Mart Cart since I started.

11 Q. Okay. So you've got 24 years of experience with
12 that Mart Cart that we're going to be talking about today.

13 A. Correct.

14 Q. I want to make it clear, you have not personally
15 traveled to Mason City to inspect or review the electric
16 carts that Mills Fleet Farm had made available to its
17 customers as of April 2017; is that right?

18 A. That's correct.

19 Q. Okay. But going back to last summer, I -- I
20 contacted you to discuss this matter. And when I did
21 that, did I provide to you a document that showed the
22 serial numbers of the devices that Mills Fleet Farm
23 indicated that it had in its possession and use in its
24 Mason City store?

25 A. Yes.

1 Q. And did you take a look at those serial numbers and
2 look them up on your end to determine what kind of device
3 those were registered to be?

4 A. Yes.

5 Q. And -- and what did you determine those to be?

6 A. They -- they were our Mart Cart Model 02002s.

7 Q. Does that have a -- a specific name of -- that
8 you've -- or -- or title that you use --

9 A. That --

10 Q. -- when you're referring to the --

11 A. That -- that 02002 is how we affectionately refer to
12 them, yeah.

13 Q. Okay. It's just a number. Okay.

14 And when I contacted you last summer to discuss
15 this, did I also provide you with photographs of what
16 generally appeared to be a -- a branded Mart Cart? And
17 those have been what's now marked -- and they're in front
18 of you as Exhibits A through L.

19 A. Yes.

20 Q. Okay. Were you able, sir -- I can't -- I'm not sure
21 if you can recall; but when you looked up those serial
22 numbers, were you able to determine general dates of when
23 they were manufactured and sold?

24 A. Yes, and I -- I apologize. Off the top of my head,
25 I don't remember exactly, but I can look at it again.

1 That was '02. 2002.

2 Q. 2002.

3 Would you now in -- in front of you, take a look at
4 Defendant's Exhibit P, P as in Paul, and tell me if you
5 can identify what this exhibit is.

6 A. Yes. This is our owner's manual for the Mart Cart.

7 Q. Sir, is that the owner's manual that would have
8 accompanied the -- the Mart Carts, these 02002 models that
9 were delivered to Mills Fleet Farm when those carts would
10 have been purchased?

11 A. Yes, I believe so.

12 Q. I'd like you to assume for purposes of my questions
13 moving forward that the three Mart Carts that are
14 identified in -- in Defendant's Exhibit N were in use and
15 operation at the Mills Fleet Farm store in April 2017. Is
16 that okay?

17 A. Yes.

18 Q. Okay. And I'd like you to further assume that the
19 photographs identified generally in Defendant's Exhibits A
20 through L show the Mart Carts in the condition in which
21 they existed in the Mason City Mills Fleet Farm store on
22 April 24th, 2017, okay?

23 A. Okay.

24 Q. First, before I move on, I -- I want to ask you if
25 you can tell us whether you have knowledge, training,

1 skill, or experience with respect to the design, the
2 posted warnings and instructions, and intended use of the
3 Mart Carts which were in the Fleet Farm store in Mason
4 City on April 24th, 2017.

5 A. I do.



9 Q. (Mr. Swanson continued.) Okay. Would you please
10 tell us about that generally? What -- give us your -- the
11 extent of what -- you know, your knowledge, training,
12 skill, or experience with respect to those machines,
13 specifically the design and the posted warnings and
14 instructions.

15 A. Well, having been in a -- a sales capacity with the
16 carts over the years, I've had, you know, an opportunity
17 to present those from a design and feature-benefit aspect
18 to the customers, from construction all the way up to
19 performance and -- and intended use.

20 Q. And what relative to the -- the design can you speak
21 to about the intended use of the Mart Carts? Are they
22 designed for indoor use or outdoor use or both?

23 A. They're designed for indoor use.

24 Q. Jumping back to that Exhibit P, as the purchaser of
25 a Mart Cart, would that owner's manual identified as

1 Exhibit P have been delivered by APC with each Mart Cart
2 sold?

3 A. Yes, it -- it would.

4 Q. Okay. And you -- it's your testimony today that
5 Exhibit P, as in Paul, corresponds to those actual devices
6 that -- that we've now assumed were in the mart -- the
7 Mills Fleet Farm store in April 2017; is that right?

8 A. Yes.

9 Q. I do want to have you flip now in Exhibit P to the
10 page identified as page 19. It's actually the third page
11 of the exhibit.

12 A. Okay.

13 Q. When APC delivered these Mart Carts to Mills Fleet
14 Farm, did it convey warnings to the machine owner as part
15 of its important safety instructions?

16 A. Yes.

17 Q. And what do those warnings include relative to where
18 those carts are to be used or should be used?

19 A. It -- it clearly states that -- for indoor use only
20 on level surfaces.

21 Q. And does it also present in that owner's manual
22 recommended operating procedures?

23 A. Yes.

24 Q. And did that include some recommended procedures
25 relative to where the cart should be used?

1 A. A repeat of that. The cart -- for indoor use only
2 on level surfaces, yes.

3 Q. Just in general now, with -- with your experience
4 over the last 24 years with these machines, out of
5 honestly some curiosity, why do you have that -- those
6 instructions and warnings in your owner's manual relative
7 to these carts?

8 A. Because the intended use, the -- the design and
9 intended use of the carts is for indoor use for shopping
10 inside of a retail facility.

11 Q. Why are they -- why do you recommend against outdoor
12 use for these? Just can you explain a little bit more --
13 in more detail?

14 A. Because the design, which makes it successful for
15 shopping, doesn't make it -- you know, doesn't prepare it
16 for outdoor use. It's designed for shopping, slow speeds,
17 low center of gravity. And that's not conducive to an
18 outside atmosphere.

19 Q. Have you or this company, APC, identified risks to
20 users of carts if they get outdoors on uneven surfaces?

21 A. It is -- we -- we do assume that is a risk, yes.
22 That's why we recommend against it.

23 Q. And are we talking about a risk of -- of damage to
24 the equipment and injury to the user that you don't --
25 that would not be acceptable if they were to be used

1 outside?

2 A. Potentially, yes.

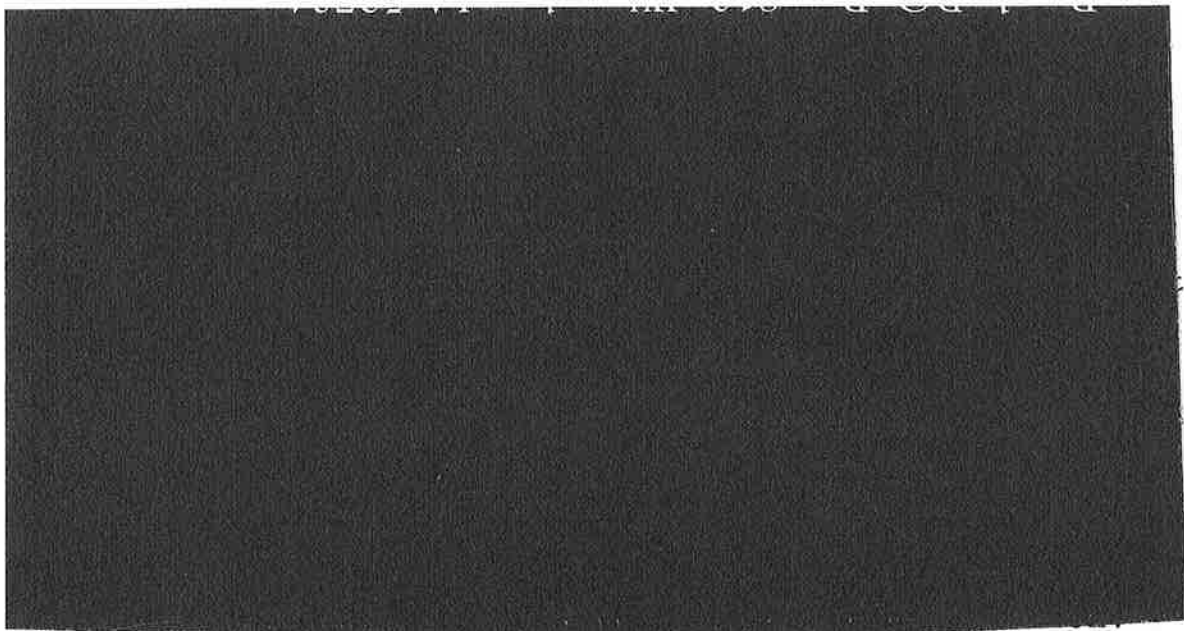
3 Q. Also on Exhibit P, as in Paul, I believe on the last
4 page of the exhibit, which is page 0026, there's just a
5 litany of the instructions or warnings that end up being
6 affixed to each cart -- or each Mart Cart brand 02002; is
7 that correct?

8 A. Yes.

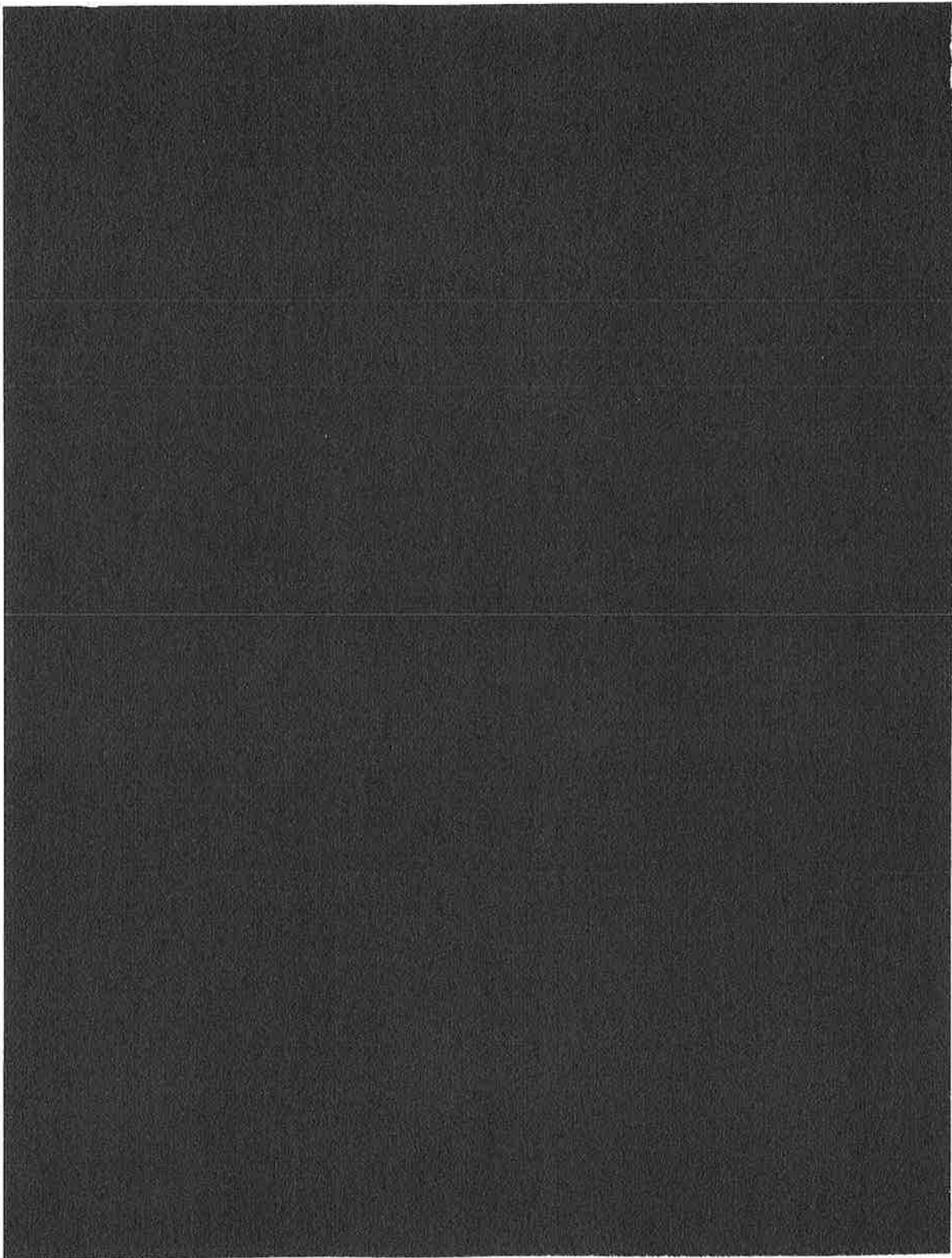
9 Q. Now, sir, I'd like you to take us onto one of those
10 Mart Carts as if we were seated on the cart itself, okay?

11 A. Okay.

12 Q. And tell us what instructions and warnings would
13 that user see related to the appropriate use of the cart.
14 And you can -- you can refresh us by referring to any of
15 these photographic exhibits, as well.

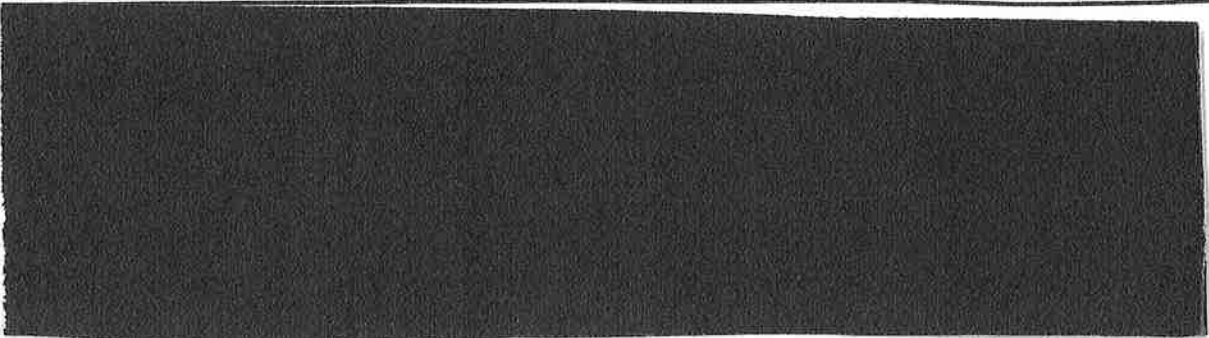


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Q. (Mr. Swanson continued.) Mr. Duffy, I'm asking you to take us onto one of those Mart Carts, again, as if we were seated on the cart itself, and ask you to identify what instructions and warnings would the cart user see related to the appropriate use of the cart.

A. And I'm using the -- referring to the exhibits; yes?

Q. You can. You -- you can use those to refresh your recollection or point out which ones would be visible to a cart user.

A. When -- when you sit down on the -- when you're seated on the Mart Cart, the first, at -- at the headset where the controls are, the first -- warning label is right there that says "Indoor use only; flat level surfaces."

There is also the operating instructions placard hanging on the basket, which would be located basically here that would say the -- the same thing. It has that "Indoor use only; flat level surfaces."

And it is also in our general -- on that model, on the general operating instructions on the -- and warnings

1 on -- on the cowlings, there's a long decal, and it says it
2 there, "Indoor use only; flat level surfaces." At least
3 those three.

4 And on the back of the basket placard, it says
5 "Indoor use only" and "No children in baskets."

6 So it's in at least four -- four places where you
7 would see it.

8 Q. At least for somebody sitting on a cart, would I be
9 correct in saying, Mr. Duffy, that when seated, there are
10 at least three warnings or instructions letting the user
11 know that they are for indoor level surfaces only and
12 should not be removed from the store?

13 A. That's correct.

14 Q. And these warnings or instructions come with the
15 machine when the customer purchases it?

16 A. I'm -- one more time?

17 Q. And these warnings or instructions come with the
18 machine when the customer, like Mills Fleet Farm,
19 purchases it. In other words, it's not something that a
20 customer like Fleet Farm would put on later.

21 A. No. You're correct. That -- that comes with the
22 unit.

23 Q. And these warnings and instructions have -- am I
24 correct in saying that they've been on the Mart Carts and
25 they've been sold to customers like Mills Fleet Farm with

1 these instructions and warnings both on the machine and
2 its owner's manual since at least 2002?

3 A. Yes.

4 Q. Have Mart Carts or APC ever advised or recommended
5 to a customer, such as Fleet Farm, to disregard or not
6 follow the instructions and warnings that accompany the
7 electric cart or to permit its customers to use them
8 outdoors?

9 A. No.

10 Q. And why would that be a -- a bad idea?

11 A. As I mentioned before, it's not how it was designed.
12 That's not its intended use, which is for indoor use only.

13 Q. Do you have an opinion, Mr. Duffy, as to whether it
14 is a legitimate -- it is legitimate for a retail store,
15 such as Mills Fleet Farm, when providing Mart Carts for
16 use, to ask its customers to comply with the posted
17 instructions and warnings?

18 A. I believe it is, yes.

19 Q. Does Mart Cart have competitors in this industry?

20 A. We do.

21 Q. And as part of your work in sales and marketing for
22 Mart Carts, do you have specialized knowledge about how
23 other cart manufacturers design their carts and how they
24 instruct and warn end users relative to appropriate use?

25 A. I -- yes, somewhat.

1 Q. Let's -- let's go back to that. Tell us about
2 these -- the competitors that you have in this
3 marketplace. Generally, who -- who are the well-known
4 players in this field?

5 A. They would include Amigo Mobility, Dane Industries,
6 Eagle Manufacturing. Those would be the -- the main
7 players in the field.

8 Q. And what can you tell this jury about how these
9 other cart manufacturers design their carts and instruct
10 and warn end users relative to a -- a use, either indoors
11 or outdoors?

12 A. To -- to the best of my knowledge, they -- they
13 are -- we -- in agreeance that indoor use only is pretty
14 standard, yeah.

15 Q. Are you aware of any others in the industry who
16 would design these carts for both indoor and outdoor use?

17 A. Not firsthand, no.

18 Q. Are Mart Carts designed or intended to be used by
19 children?

20 A. Not specifically. We don't put an age -- we don't
21 post an age requirement. That's -- that would be up to
22 the store's discretion and monitoring, I suppose.

23 Q. Mr. Duffy, are these carts designed or intended for
24 use only by persons with disabilities, or can -- are they
25 designed for others to use --

1 A. For anyone --

2 Q. -- as well?

3 A. For -- for anyone that needs help shopping.

4 Q. Mr. Duffy, the opinions you've rendered today, have
5 they been offered to a reasonable degree of certainty?

6 A. Yes.

7 Q. And you did provide me with an affidavit that you
8 signed back on August 30th of -- of 2018, earlier in this
9 case; is that correct?

10 A. That is correct.

11 Q. And what you've testified here today is a -- a
12 summary, essentially, of what you -- the information you
13 provided to us last August; is that correct?

14 A. That's correct.

15 Q. All right. Mr. Duffy, I don't have any further
16 questions.

17 A. Okay.

18 EXAMINATION

19 BY MR RILEY:

20 Q. Hello, Mr. Duffy. My name is Peter Riley, and I
21 have a few questions.

22 Would you take a look at Exhibit P and the third
23 page, which would have the numbers 0019?

24 A. Okay.

25 Q. All right. And by the way, Exhibit P is an owner's

1 manual. That would be provided to the owner, which in
2 this case would be Mills Fleet Farm Group; correct?

3 A. That is correct.

4 Q. This would not be given to a customer of Mills Fleet
5 Farm as a matter of practice, would it?

6 A. No, not -- not by us.

7 Q. Among the warnings is the warning, quote, Never
8 allow the cart to be used out-of-doors or on any surface
9 that is not level, unquote. Do you see that?

10 A. I do.

11 Q. So this is a warning in the owner's manual to the
12 buyer, in this case Mills Fleet Farm Group?

13 A. Yes.

14 Q. Do you know whether Mills Fleet Farm Group ever
15 allowed Mart Carts to be used out-of-doors?

16 A. I do not.

17 Q. If Mills Farm Fleet did allow Mart Carts to be used
18 out-of-doors, that would be in violation of the warning in
19 the owner's manual, would it not?

20 A. It would be in conflict with our recommendations.

21 Q. Well, is it a recommendation, or is it a warning?

22 A. It is a warning.

23 Q. And it says "Never allow the cart to be used
24 out-of-doors or on any surface that is not level." Do you
25 consider that a recommendation or a specific direction?

1 A. It -- our intended use is for indoor use only on
2 level surfaces, so it's a -- it's a warning that we
3 provide. That's how we intend the cart to be used.

4 Q. All right. You're not recommending it. You're
5 saying, "Don't do it"; correct?

6 A. Yes. We're saying that's how we built the cart.
7 It's for indoor use only.

8 MR. RILEY: That's all the questions I
9 have.

10 CONTINUED EXAMINATION

11 BY MR. SWANSON:

12 Q. Just to follow, Mr. Duffy.

13 If a store employee of Mills Fleet Farm observed
14 a -- a customer using one of the Mart Carts out-of-doors,
15 it would be, in your opinion, appropriate and consistent
16 with the instructions and warnings that APC provided to
17 a -- a customer, the -- in this case Mills Fleet Farm, for
18 that employee to ask the user to return the cart indoors.
19 Would you agree?

20 A. I would agree.

21 MR. SWANSON: And at this point, if not
22 already admitted into evidence, I would offer
23 Defendant's Exhibits A, B, E, K, L, and P, as in
24 Paul.

25 MR. RILEY: Consistent with our

1 stipulation, I'll make my objections, if any, at
2 the time of trial.

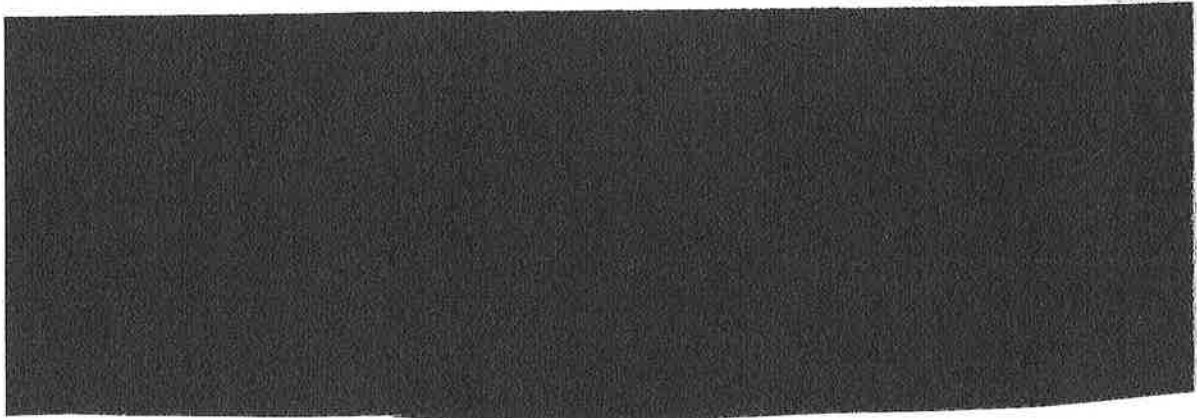
3 MR. SWANSON: Okay. That's all I have
4 today. Thank you very much.

5 MR. RILEY: Yeah. Well, just a minute.
6 I -- I have some follow-up questions to the
7 questions that you just asked.

8 CONTINUED EXAMINATION

9 BY MR. RILEY:

10 Q. If a customer had previously been allowed to use the
11 Mart Cart outside of the store building, do you believe
12 that the customer would have an expectation that it could
13 be used, notwithstanding whatever warnings there might be
14 on the cart?



21 Q. (Mr. Riley continued.) Do you need the question
22 read back to you, sir?

23 A. Am I answering? Sorry. Yes, please.

24 (The reporter read the question at page 27, line 10.)

25 A. I -- well, I couldn't speak to customers'

1 expectations in that. I -- I would just say it's -- my
2 opinion would be that it's appropriate for the store to
3 enforce its policies.

4 Q. (Mr. Riley continued.) And if store employees had
5 previously allowed Mart Carts to be used outside of the
6 store building, if a store employee then directed the
7 customer to no longer do that, notwithstanding prior
8 practice, would that be consistent with what your company
9 recommends or directs?

10 A. Our company -- our company recommends indoor use
11 only for the carts, and it's up to the stores to enforce
12 that.

13 Q. So -- so you have no control. Your company has no
14 control over how the store enforces any directions or
15 recommendations that you or your company, as manufacturer,
16 make; correct?

17 A. That's correct.

18 MR. RILEY: I have no further questions.

19 MR. SWANSON: And nothing further here.

20 Thank you, Mr. Duffy.

21 THE WITNESS: Thank you.

22 MR. RILEY: Thank you very much, Mr. Duffy.

23 THE WITNESS: Thank you.

24 THE VIDEOGRAPHER: We're off the record at

25 9:25 a.m.

1 (Whereupon, at 9:25 a.m., the deposition was concluded.)
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C E R T I F I C A T E

STATE OF ARKANSAS)
)
 COUNTY OF BENTON)

I, SHEILA B. ALEXANDER, Certified Court Reporter, a notary public in and for the aforesaid county and state, do hereby certify that Charles Gavan Duffy was duly sworn by me prior to the taking of testimony as to the truth of the matters attested to and contained therein; that the testimony of said witness was taken by me in Stenotype and was thereafter reduced to typewritten form by me or under my direction and supervision; that the foregoing transcript is a true and accurate record of the testimony given to the best of my understanding and ability.

I FURTHER CERTIFY that I am neither counsel for, related to, nor employed by any of the parties to the action in which this proceeding was taken; and, further, that I am not a relative or employee of any attorney or counsel employed by the parties hereto, nor financially interested, or otherwise, in the outcome of this action; and that I have no contract with the parties, attorneys, or persons with an interest in the action that affects or has a substantial tendency to affect impartiality, that requires me to relinquish control of an original deposition transcript or copies of the transcript before it is certified and delivered to the custodial attorney, or that requires me to provide any service not made available to all parties to the action.

IN WITNESS WHEREOF, I have hereunto set my hand and affixed my seal of office this 5th day of February,

2019 SHEILA ALEXANDER, CCR, RMR, CRR
 Official Seal
 CERTIFIED COURT REPORTER
 ARKANSAS SUPREME COURT
 Cert. No. 586
 NOTARY PUBLIC - ARKANSAS
 My Commission Exp. Nov. 14, 2028
 COMMISSION #12368652

Sheila B. Alexander
 SHEILA B. ALEXANDER, CCR, RMR, CRR
 Certificate No. 586
 NOTARY PUBLIC
 In and for the County of Benton
 State of Arkansas

My Commission Expires
 November 14, 2028

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