

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DIVISION OF ILLINOIS
EASTERN DIVISION

RYAN CHRISTANSON,)
Plaintiff,)
)
v.)
)
BICYCLE MESSENGERS, INC., and)
YAMAHAHONDA, INC.)
Defendants.)
)
)

Judge: Michael J. McSherry
Case No.: 2009-cv-3243

**PLAINTIFF RYAN CHRISTANSON'S ANSWERS TO DEFENDANT
YAMAHAHONDA, INC., FIRST SET OF INTERROGATORIES**

NOW COMES, the Plaintiff Ryan Christianson, by his undersigned counsel, for his
Answers to Defendant Yamahonda, Inc., First Set of Interrogatories answers as follows:

1. Identify all motorcycle training classes or programs that you participated in prior to
March 5, 2008.

ANSWER:

Plaintiff states that he took and successfully completed the state of Illinois mandated
motorcycle operator's course. Said course consisted of two (2) eight hour days where a final
motorcycle driving test is required. Plaintiff passed all the requirements and received his
motorcycle operator's license on July 8, 2005.

2. Identify the make and model of any and all motorcycles that you have ridden in the ten
years prior to March 5, 2008.

ANSWER:

Plaintiff states that he has ridden the following motorcycles:

- 1967 Harley Davidson Classic Fat Boy
- 1999 CBR 6000
- 2008 Yamahonda Penumbra Sport

3. Describe the leg guard that should have been incorporated into the product; state the intended function of the leg guard.

ANSWER:

Plaintiff states that most models made after 2007 contain a leg guard that is made of stainless steel and wraps from the front axle in the front of the bike, where it wraps around the front of the operator's shin and attaches near the foot pedals. The intended function of the leg guard is to protect the rider's legs from impact. See attached document, Bates number YM 001.

4. At what speed was the plaintiff operating the motorcycle prior to the accident

ANSWER:

Plaintiff was traveling at or near the speed limit of 65 miles per hour at the time of the accident.

5. What were the weather conditions at the time of the accident.

ANSWER:

Plaintiff states that the weather was fair at the time of the accident, however, a few hours prior it had been raining.

6. State whether Plaintiff inquired about leg guards at the time he purchased the Penumbra Sport motorcycle. If so, what did Plaintiff inquire about, to whom, and where?

ANSWER:

Plaintiff states that he never sought any information about leg guards at the time of or after his purchase of the Penumbra Sport.

7. State whether Plaintiff received the Penumbra Sport handbook. If so, please state whether Plaintiff read the Penumbra Sport Handbook. Finally, if so, please indicate whether Plaintiff specifically read pages 34 and 35 of the handbook.

ANSWER:

Plaintiff did receive a handbook with his materials that he purchased from Yamahonda's retail dealer. Plaintiff, however, maintains that this handbook was tendered with as many as 15 other handbooks relating to promotional offers, other motorcycles, motorcycle rally's, motorcycle lessons, service stations, and many more. Plaintiff states that at no time did anyone direct Plaintiff to the handbook nor any pages within the handbook.

YM 001



Leg Guard