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MEMORANDUM

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**TO:** Honorable Waya Thlocco

**CC:** William Buckley, Clerk of the Court  
Maria Morgan, Plaintiffs' Counsel  
Juan Gomez, Defendant's Counsel

**FROM:** Mariaelena John, Engineering Expert Witness

**DATE:** July 23, 2021

**RE:** Daylen v Blat Company, Engineering Expert Witness

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**Question Presented**

Did the wiring in the Blat Company NueAir air purifier fabrication fail to meet industry safety standard leading to fires in customers' properties, making the manufacturer liable for customers' fire losses?

*In this section, you will provide a complete, concise, and grammatically correct statement of the legal question.*

**Brief Answer**

Blat Company is liable for customers' fire damage losses, as the company's NueAir product has been shown to likely be out of compliance with industry safety standards.

*In this section, you will state your finding on the answer to the legal question completely, concisely, and grammatically correct.*

**Facts**

*In this section, you will present 1) the context of the case; 2) the data you were provided and its meaning to the case; and 3) how what you were provided will enable you to determine your recommendation. Organize this to read in a way that the readers will understand the issue at the heart of the case and the importance of the input information in addressing the question arising from the issue. Remember the readers are likely not statisticians, engineers or computer scientists.*

**Discussion**

*In this section, you will provide a plain language, the logic of your approach to addressing the case (why does this approach allow you to make a determination on this case?), what you know from your analysis of the data and your finding. End with a statement of your recommended judgement on the case. DO NOT walk the jury through your math, they will not understand it.*

**Conclusion**

*In this section, you will provide a synthesis of the entire memorandum, being sure to include the answer to the legal question.*

## **Appendix A – Statistical Calculations**

Include in this section a typewritten copy of your calculations. Organize them in a way that the steps you took are clear for the reader to see. Start with what you know and how you will approach the problem. End with the mathematical answer, what it means statistically, and what it means for the case.