

COPY

IN THE CIRCUIT COURT OF HINDS COUNTY, MISSISSIPPI  
FIRST JUDICIAL DISTRICT

FILED

MAR 10 2011

BARBARA DUNN, CIRCUIT CLERK  
BY \_\_\_\_\_ J.C.

FILE COPY

GRACEYN THRAILKILL, A MINOR,  
BY AND THROUGH LANE THRAILKILL  
AND HOLLY THRAILKILL HER NATURAL  
PARENTS AND LEGAL GUARDIANS, AND  
HOLLY THRAILKILL, INDIVIDUALLY

PLAINTIFFS

v.

CIVIL ACTION NO. 251-11-226

DOREL JUVENILE GROUP, INC.,  
DOREL U.S.A., INC., TONYA GANN,  
and DOES 1-10

DEFENDANTS

**COMPLAINT**  
**(Jury Trial Demanded)**

COME NOW the Plaintiffs, Graceyn Thraikill, a minor, by and through Lane Thraikill and Holly Thraikill her natural parents and legal guardians, and Holly M. Thraikill individually and file this Complaint against Defendants Dorel Juvenile Group, Inc., Dorel U.S.A., Inc., Tonya Gann, and Does 1-10. In support of this complaint Plaintiffs allege the following:

**PARTIES**

1. Plaintiff Graceyn Thraikill is a minor. She was born on November 26, 2003. She resides at 101 Warren Road in Rankin County, Mississippi with her natural parents and legal guardians, Holly Thraikill and Lane Thraikill.

2. Plaintiff Holly Thraikill is an adult resident citizen of Rankin County, Mississippi. She resides at 101 Warren Road in Rankin County.

3. Defendant Dorel Juvenile Group, Inc. is a foreign corporation domiciled in the State of Massachusetts.

4. Defendant Dorel Juvenile Group, Inc. is not authorized to do business in the State of Mississippi but is, in fact, doing business in the State of Mississippi.

5. Defendant Dorel Juvenile Group, Inc. committed a tort in the State of Mississippi against Mississippi residents Graceyn Thraikill and Holly Thraikill.

6. Defendant Dorel Juvenile Group, Inc. may be served with process via its registered agent for service of process: Corporation Service Company, 84 State Street, Boston, MA 02109.

7. Defendant Dorel U.S.A., Inc. is a foreign corporation domiciled in the State of Delaware.

8. Defendant Dorel U.S.A., Inc. is not qualified to do business in the State of Mississippi but is, in fact, doing business in the State of Mississippi.

9. Defendant Dorel U.S.A., Inc. committed a tort in the State of Mississippi against Mississippi residents Graceyn Thraikill and Holly Thraikill.

10. Defendant Dorel U.S.A., Inc. may be served with process via its registered agent for service of process: Corporation Service Company, 2711 Centerville Road; Suite 400, Wilmington, DE 19808.

11. Defendant Tonya Gann is an adult resident citizen of the State of Mississippi who can be served with process at the Central Mississippi Correctional Facility in Rankin County, Mississippi.

12. Defendants Does 1-10 are fictitious parties who or which caused or contributed to cause the injuries to Graceyn and Holly as set forth herein. The identities of these fictitious party defendants are unknown to Graceyn and Holly but the true identity of Does 1-10 will be substituted by amendment when their identity is ascertained.

## JURISDICTION & VENUE

13. The Circuit Court of the First Judicial District of Hinds County, Mississippi has jurisdiction over defendant Tonya Gann, a Mississippi resident.

14. The Circuit Court of the First Judicial District of Hinds County, Mississippi has jurisdiction over defendants Dorel Juvenile Group, Inc., and Dorel U.S.A., Inc. pursuant to the Mississippi Long-Arm Statute, Mississippi Code Annotated § 13-3-57. The Mississippi Long-Arm Statute provides in relevant part:

Any nonresident person, firm, general or limited partnership, or any foreign or other corporation not qualified under the Constitution and laws of this state as to doing business herein, who shall make a contract with a resident of this state to be performed in whole or in part by any party in this state, or who shall commit a tort in whole or in part in this state against a resident or nonresident of this state, or who shall do any business or perform any character of work or service in this state, shall by such act or acts be deemed to be doing business in Mississippi and shall thereby be subjected to the jurisdiction of the courts of this state.

15. Defendants Dorel Juvenile Group, Inc. and Dorel U.S.A., Inc., both of which are foreign corporations not qualified to do business under the Constitution and laws of Mississippi, committed a tort against Mississippi residents Graceyn Thraikill and Holly Thraikill.

16. The damages sustained by Graceyn and Holly occurred in the State of Mississippi.

17. Defendants Dorel Juvenile Group, Inc. and Dorel U.S.A., Inc. have sufficient minimum contacts with Mississippi such that maintenance of this suit in the Circuit Court of the First Judicial District of Hinds County, Mississippi does not offend traditional notions of fair play and substantial justice.

18. Venue is proper in the Circuit Court of the First Judicial District of Hinds County, Mississippi pursuant to Miss. Code Ann. § 11-11-3 which provides that civil actions alleging a

defective product may be commenced in the county where the plaintiff obtained the product.

19. The Protek belt-positioner booster (model 22291 CLI) Graceyn was sitting in when she was rendered a paraplegic was purchased within the First Judicial District of Hinds County, Mississippi.

### **FACTUAL BACKGROUND**

20. On March 25, 2008 Graceyn was seated in a Protek belt-positioner booster (model 22291 CLI) positioned on the right outboard position of the second row of seating in Holly's 2004 Nissan Quest mini-van.

21. Graceyn was restrained by the 2004 Nissan Quest's three-point seat belt system.

22. Holly followed the instructions provided by Dorel Juvenile Group, Inc. and Dorel U.S.A., Inc. for the proper way in which to use the 2004 Nissan Quest's three-point seat belt system to restrain Graceyn in a Protek belt-positioner booster (model 22291 CLI).

23. At approximately 8:00 A.M. on March 25, 2008, while traveling in a southerly direction on Shiloh Road in Rankin County, Mississippi the 2004 Nissan Quest in which Holly and Graceyn were riding was hit by a vehicle driven by Tonya Gann.

24. Despite the fact that Graceyn was seated in the Protek belt-positioner booster (model 22291 CLI) and restrained using the 2004 Nissan Quest's three-point seat belt system in a manner consistent with the instructions provided by Dorel Juvenile Group, Inc. and/or Doral U.S.A., Inc., Graceyn was permanently rendered a paraplegic in this collision.

**LIABILITY OF TONYA GUNN**

25. Tonya Gann was negligent in driving a motor vehicle on March 25, 2008 while intoxicated.

26. Tonya Gann was negligent in failing to maintain proper control of the motor vehicle she was driving on March 25, 2008 and allowing it to cross the center line of Shiloh Road and hit the 2004 Nissan Quest mini-van thereby injuring Graceyn and Holly.

**LIABILITY OF DOREL JUVENILE GROUP and DORAL U.S.A., INC.  
PURSUANT TO MISSISSIPPI CODE ANNOTATED § 11-1-63**

27. Dorel Juvenile Group, Inc. and/or Doral U.S.A., Inc. designed, manufactured, marketed, and/or sold the Protek belt-positioner booster (model 22291 CLI) that Graceyn was using on March 25, 2008 when she was rendered a paraplegic.

28. The subject Protek belt-positioner booster (model 22291 CLI) is defective pursuant to Mississippi Code Annotated § 11-1-63.

29. At the time the Protek belt-positioner booster (model 22291 CLI) left the control of Dorel Juvenile Group, Inc. and/or Doral U.S.A., Inc. these defendants failed to provide the Protek belt-positioner booster (model 22291 CLI) with adequate warnings and/or instructions on how to properly use the Protek belt-positioner booster (model 22291 CLI) to safely restrain a four-year-old child such as Graceyn.<sup>1</sup>

30. The inadequate warnings and/or instructions on how to properly use the Protek belt-positioner booster (model 22291 CLI) to safely restrain a four-year-old such as Graceyn rendered the Protek belt-positioner booster (model 22291 CLI) unreasonably dangerous to Graceyn.

31. The inadequate warnings and/or instructions that accompanied the Protek belt-positioner

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<sup>1</sup> A copy of the Protek Belt-Positioner Booster Owner's Manual is attached to this complaint at Exhibit A.

booster (model 22291 CLI) rendered the Protek belt-positioner booster (model 22291 CLI) unreasonably dangerous to Graceyn Thrailkill, and this unreasonably dangerous condition was a proximate contributing cause of the damages for which recovery is sought.

32. At the time the Protek belt-positioner booster (model 22291 CLI) left the control of Dorel Juvenile Group, Inc. and/or Doral U.S.A., Inc., these defendants knew or in light of reasonably available knowledge should have known about the inadequate warnings and/or instructions that accompanied the Protek belt-positioner booster (model 22291 CLI), and that the ordinary user or consumer would not realize the dangerous condition presented by these inadequate warnings and/or instructions.

33. The warnings and/or instructions provided by Dorel Juvenile Group, Inc. and/or Doral U.S.A., Inc. were not adequate. An adequate product warning or instruction is one that a reasonably prudent person in the same or similar circumstances would have provided with respect to the danger.

34. The inadequate warnings and/or instructions provided by Dorel Juvenile Group, Inc. and/or Doral U.S.A., Inc. and that accompanied the Protek belt-positioner booster (model 22291 CLI) failed to communicate sufficient information on the dangers and safe use of the Protek belt-positioner booster (model 22291 CLI), taking into account the characteristics of, and the ordinary knowledge common to an ordinary consumer, such as Holly, who purchases a Protek belt-positioner booster (model 22291 CLI).

35. Holly and Graceyn did not know that the warnings and/or instructions that accompanied the Protek belt-positioner booster (model 22291 CLI) were inadequate, and that using the Protek belt-positioner booster (model 22291 CLI) with these inadequate warnings and/or instructions was inconsistent with Graceyn's safety.

36. Holly and Graceyn did not appreciate the risk presented by the inadequate warnings and/or

instructions that accompanied the Protek belt-positioner booster (model 22291 CLI).

37. Holly and Graceyn did not deliberately and voluntarily choose to expose Graceyn to the inadequate warnings and instructions that accompanied the Protek belt-positioner booster (model 22291 CLI).

38. The risk posed by the inadequate warnings and/or instructions that accompanied the Protek belt-positioner booster (model 22291 CLI) was not known, nor should it have been known to Holly and Graceyn.

39. The risk posed by the inadequate warnings and/or instructions that accompanied the Protek belt-positioner booster (model 22291 CLI) was not open and obvious to Holly and Graceyn.

### DAMAGES

40. Graceyn and Holly are entitled to an award of compensatory damages from Defendants Dorel Juvenile Group, Inc., Dorel U.S.A., Inc., Tonya Gann, and Does 1-10.

41. The purpose of an award of compensatory damages is to make Graceyn and Holly whole. Mississippi Code Annotated § 11-1-65.

42. Graceyn sustained severe and permanent personal injuries as a result of the incident described herein.

43. Graceyn is unable to walk, and will be confined to a wheelchair for the rest of her life.

44. Graceyn is unable to perform normal everyday bodily functions and daily tasks without assistance.

45. Graceyn sustained severe and permanent emotional distress damages as a result of this incident described herein.

46. Holly sustained personal injuries as a result of the incident described herein.

47. On March 25, 2008 Holly was seated an arm's length away from Graceyn in the 2004 Nissan Quest and witnessed first hand the traumatic life-changing injury to her four-year-old daughter.

48. As a result of witnessing this event Holly sustained severe emotional distress and mental anguish.

49. The damages sustained by Graceyn and Holly were foreseeable to Dorel Juvenile Group, Inc., Dorel U.S.A., Inc., Tonya Gann, and Does 1-10.

50. The damages sustained by Graceyn and Holly are a direct and proximate result of the combined actions of Dorel Juvenile Group, Inc., Dorel U.S.A., Inc., Tonya Gann, and Does 1-10.

51. Medical and other expenses have been incurred, and will continue to be incurred on behalf of Graceyn and Holly as a direct and proximate result of the combined actions of Dorel Juvenile Group, Inc., Dorel U.S.A., Inc., Tonya Gann, and Does 1-10.

### CONCLUSION

WHEREFORE, PREMISES CONSIDERED, plaintiffs demand a jury trial in the First Judicial District of Hinds County, Mississippi and seek an award of damages to be determined by the jury for all damages, fees, and costs of whatever kind and type available under Mississippi law against defendants Dorel Juvenile Group, Doral U.S.A., Inc., Tonya Gann, and Does 1-10 as a result of the incident described herein.



Respectfully submitted,

GRACEYN THRAILKILL, A MINOR,  
BY AND THROUGH LANE THRAILKILL  
AND HOLLY THRAILKILL HER NATURAL  
PARENTS AND LEGAL GUARDIANS, AND  
HOLLY THRAILKILL, INDIVIDUALLY

BY: Edward Sanders  
John Davidson, MBN 9073  
Edward Sanders, MBN 8880

DATED: March 10, 2011

**OF COUNSEL:**

**John Davidson**  
**Davidson Bowie, PLLC**  
**2506 Lakeland Drive, Suite 501**  
**P.O. Box 321405**  
**Flowood, MS 39232**  
**601-932-0028 (t)**  
**601-898-7304 (f)**  
**[jdavidson@dbslawfirm.net](mailto:jdavidson@dbslawfirm.net)**

**Edward Sanders**  
**Sanders Law Office**  
**2506 Lakeland Drive, Suite 501**  
**P.O. Box 321405**  
**Flowood, MS 39232**  
**601-622-5477 (t)**  
**601-898-7304 (f)**  
**[edwardlloydsanders@gmail.com](mailto:edwardlloydsanders@gmail.com)**

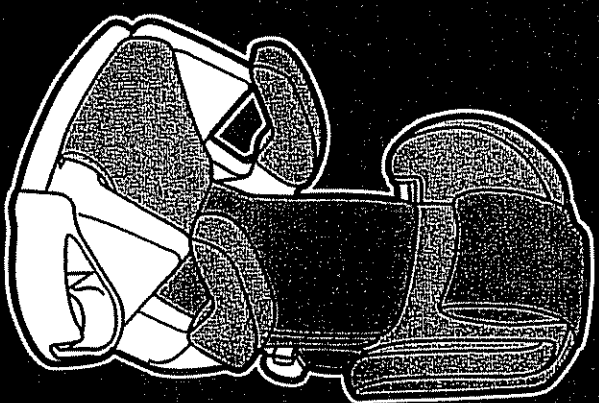
# Protek Belt-Positioner Booster Owner's Manual

www.djgusa.com

This child restraint is designed for use by children whose:

Weight:  
30-100 pounds  
(14-45 kg)

Height:  
29-57 inches  
(73-145 cm)



Read all instructions  
**BEFORE USING**  
this child restraint.  
KEEP INSTRUCTIONS FOR FUTURE USE.

**▲ IMPORTANT!**  
Failure to follow these warnings could result  
in the serious injury or death of your child.

Para recibir las instrucciones en español, llame al  
1-800-544-1108 o solicítelas por escrito al dirección por arriba.

## Replacement Parts List

NOTE: If requested color is not available, similar color will be substituted.

Part	Cost	Quantity	Total Cost
Seat Pad	\$19.99	X	= \$
(Includes seat pad, arm covers and pillow)			
Hardware	\$1.50	X	= \$
Cup Holder	\$3.50	X	= \$
Instructions	\$0.00	X	= \$
<b>Merchandise Total</b>			<b>\$</b>

Shipping and handling:	\$	\$
Up to \$25.00	\$5.95	\$100.01 to \$150.00
\$25.01 to \$50.00	\$6.95	\$150.01 to \$200.00
\$50.01 to \$75.00	\$8.95	\$200.01 and up
\$75.01 to \$100.00	\$9.95	Outside Continental USA
		\$10.00

**Sales Tax**  
(Indiana, California, Arkansas, and Massachusetts residents add applicable sales tax.)  
\$ \_\_\_\_\_  
**Grand Total** \$ \_\_\_\_\_

**Fill Out For Credit Card**  
 Visa     Mastercard

Card Exp. Date: \_\_\_\_\_

Cardholder's Name: \_\_\_\_\_

Card Number: \_\_\_\_\_

Signature \_\_\_\_\_

CUT ON DOTTED LINE

## Before You Begin...

Thank you for choosing this car seat, referred to throughout this manual as a child restraint. The DJG family is committed to creating a child restraint with the most comfort, convenience, and protection available today.

Remember, parents are a child's first teachers and examples. If you always buckle your seat belt, your child will think it is the natural thing to do. Make it a firm rule that the vehicle does not go until everyone is buckled up. Make no exceptions.

No one can predict if use of a child restraint will prevent injury or death in a particular crash. However, combined with careful driving, proper use of a child restraint can lower a child's risk of injury or death in most crashes.

Your child's safety is worth the time it will take to read and follow these instructions. After reading, if you still have questions or have any problems with this child restraint, please contact our Consumer Relations Department at:

**Dorel Juvenile Group, Inc.**  
 Website: [www.djgusa.com](http://www.djgusa.com)  
 Fax: 1-800-207-8182  
 Mailing Address: Dorel Juvenile Group, Inc.  
 P.O. Box 2609  
 Columbus, IN 47202-2609  
 Telephone: 1-800-544-1108  
 7 A.M. to 6 P.M. EST M-TH  
 7 A.M. to 4:30 P.M. EST FRI

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## **▲ WARNING**

Failure to follow these warnings could result in the serious injury or death of your child. To help you recognize those instructions which are most critical for your child's safety, we use this symbol ▲:

- ▲ According to accident statistics, children are safer when properly restrained in the rear seating positions than in the front seating positions.
- ▲ Never place a child less than one-year old forward-facing.
- ▲ Check vehicle instructions for more information about air bag/child restraint use.
- ▲ For vehicles with an air bag, but without a back seat, refer to your vehicle owners manual.
- ▲ The vehicle belt must stay tight at the belt path. If not, your child could be seriously injured or killed.
- ▲ Never take child out of the child restraint or try to tend to child's needs while the vehicle is moving. Never leave child unattended.
- ▲ Do not use a child restraint with damaged or missing parts.
- ▲ Do not substitute parts or try to modify the child restraint in any way.
- ▲ Do not use a child restraint that has been in a crash. You must get a new child restraint.
- ▲ Use the child restraint only on vehicle seats that face forward. Do not use on seats that face the sides or rear of the vehicle.

## **▲ WARNING**

▲ Check the vehicle belt before each use. Use only if the belt can be tightened properly and securely.

▲ This child restraint should be securely belted in the vehicle even when not in use. In a crash or sudden stop, an unsecured child restraint could injure other occupants.

▲ Do not use this child restraint if the midpoint of your child's head is above the top of the child restraint's back.

▲ Dorel Juvenile Group does not recommend the use of any child restraint accessories except those recommended by DJG.

▲ Never allow any child to play with this child restraint; it is not a toy.

▲ Read instructions for other warnings.

▲ Do not remove any of the warning labels or other labels on the child restraint.

▲ Placing your child in a hot child restraint may result in burns.

## Warm Weather Use

To avoid your child being seriously burned, take the following precautions:

1. Park in the shade or where sun does not directly hit the child restraint.
2. Cover the child restraint with a sheet or blanket when not in use.
3. Check for hot seat and buckles before placing child in child restraint.

## Registration and Recall Information

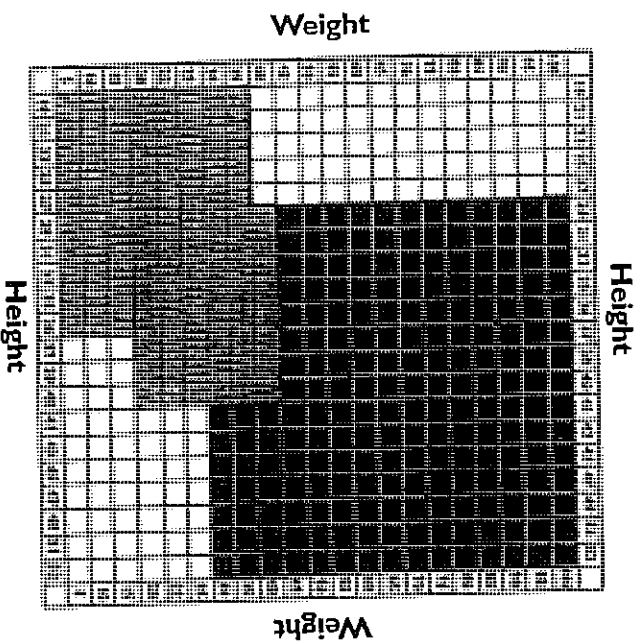
Child restraints could be recalled for safety reasons. You must register this restraint to be reached in a recall. Send your name, address and the restraint's model number and manufacturing date to:

Dorel Juvenile Group, Inc.  
 PO Box 2609, Columbus, IN 47202-2609  
 Attn: Consumer Relations or visit [www.djgusa.com](http://www.djgusa.com) or call 1-800-544-1108  
 For recall information, call the U.S. Government's Auto Safety Hotline at 1-800-424-9393.

## Aircraft Installation

This restraint is not certified for aircraft use. Do not use as a belt-positioning seat since aircraft seats do not have shoulder belts.

## Weight and Height Chart



**Rear-Facing**  
 Less than 1 year old AND 5-35 lbs. (2.3-16 kg) AND 19"-36" tall (48-91 cm.).

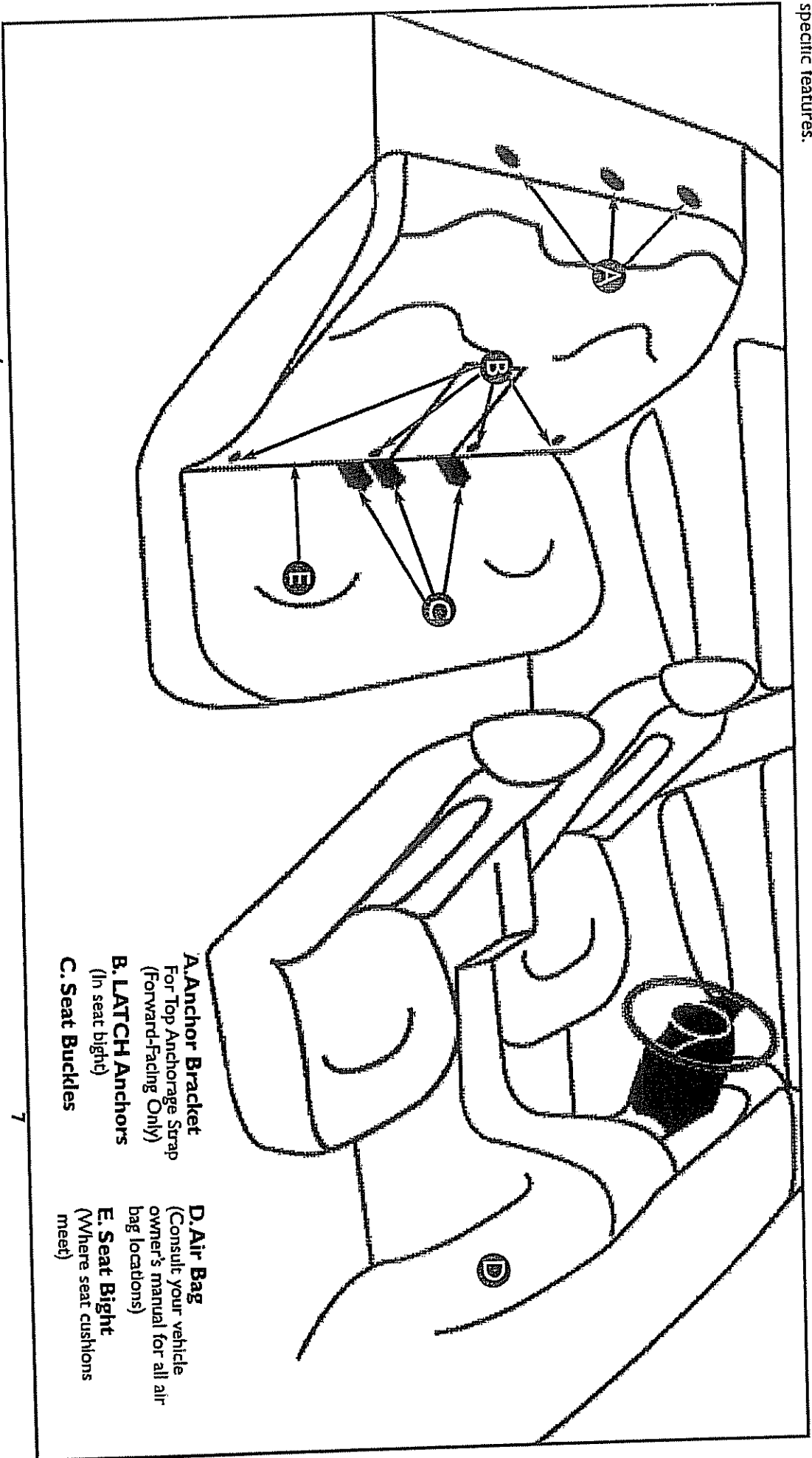
**Forward-Facing**  
 Over 1 year old AND 20-40 lbs. (9-18 kg) AND 29"-40" tall (73-102 cm.).

**Belt-Positioning Booster**  
 30-100 lbs. (14-45 kg) AND 29"-57" (73-145 cm.).

**NOTE:** If your child does not meet the criteria for the Belt-Positioning Booster, do not use this child restraint!

## Know Your Vehicle

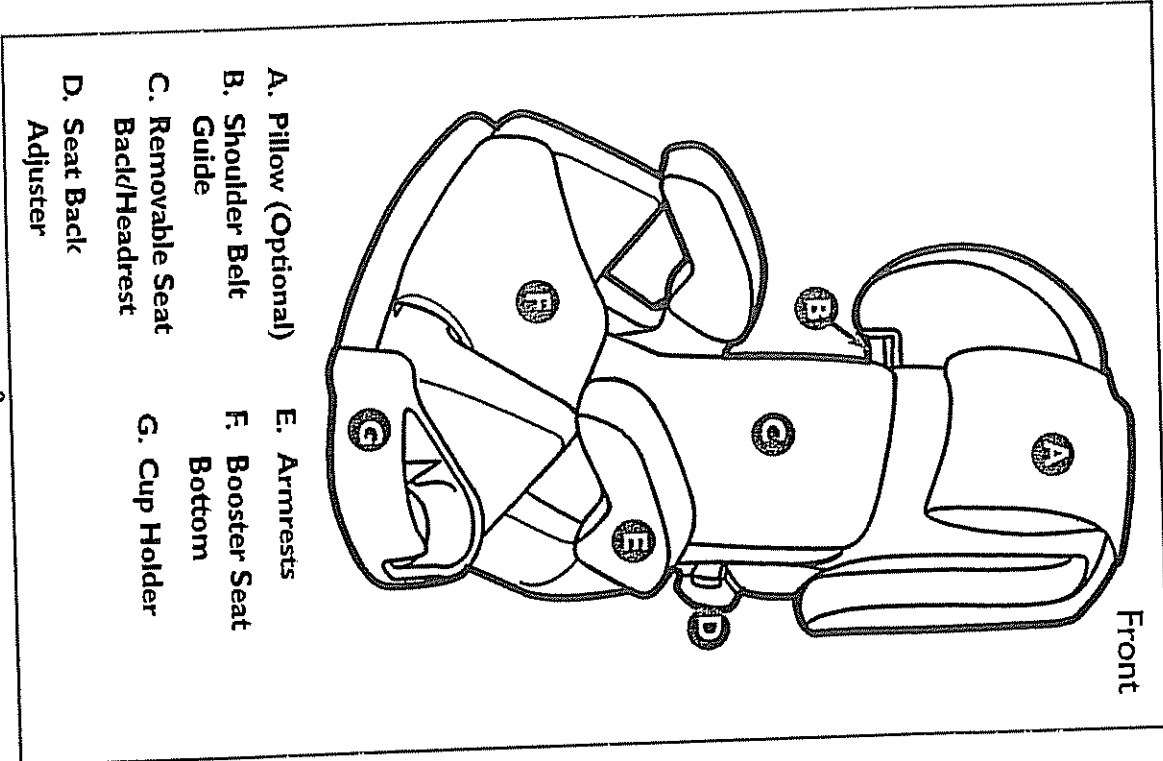
Your vehicle's features may be considerably different than those pictured here. Consult your vehicle owner's manual to help identify your vehicle's specific features.



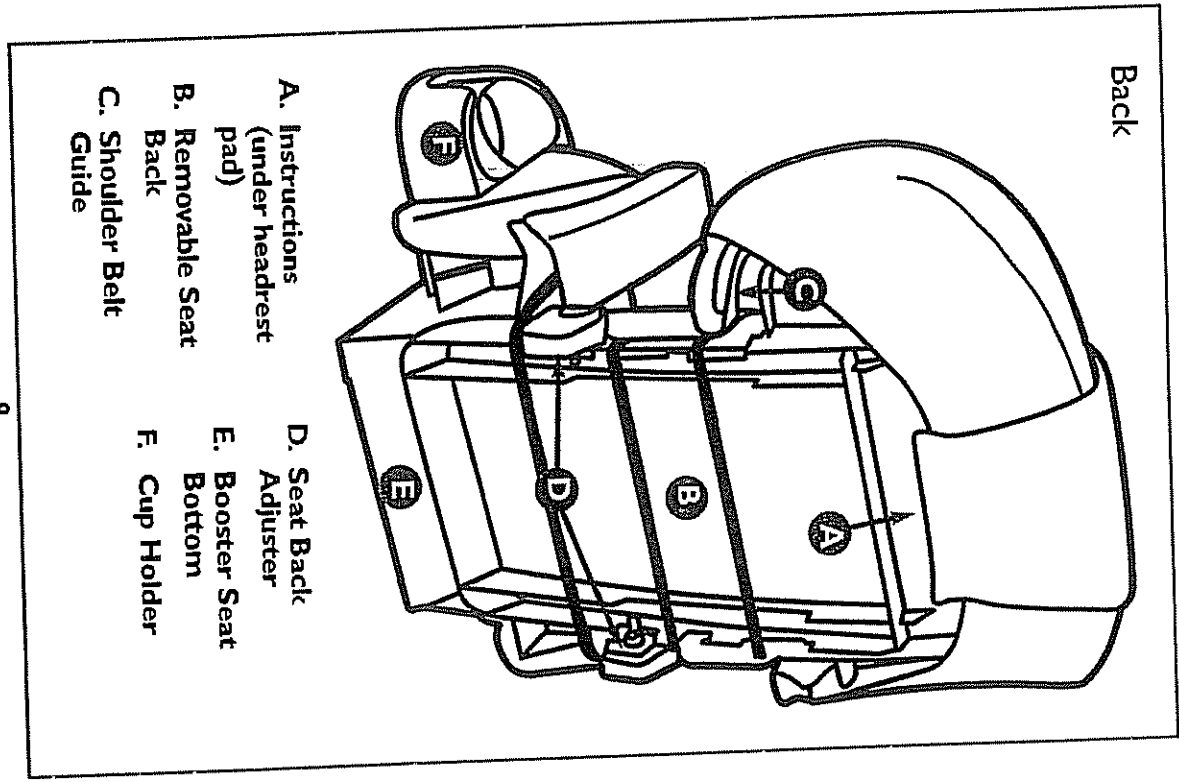
- A. Anchor Bracket**  
(For Top Anchorage Strap  
(Forward-Facing Only))
- B. LATCH Anchors**  
(In seat bight)
- C. Seat Buckles**

- D. Air Bag**  
(Consult your vehicle  
owner's manual for all air  
bag locations)
- E. Seat Bight**  
(Where seat cushions  
meet)

# Child Restraint Features

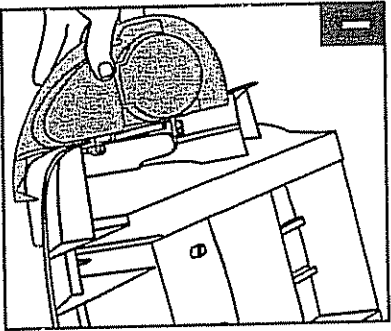


- A. Pillow (Optional)
- B. Shoulder Belt
- C. Removable Seat Back/Headrest
- D. Seat Back Adjuster
- E. Armrests
- F. Booster Seat Bottom
- G. Cup Holder

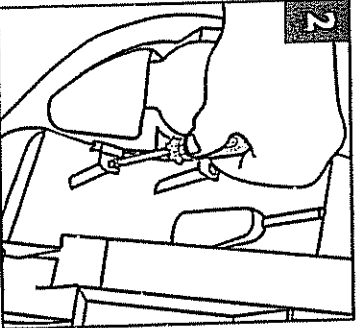


- A. Instructions (under headrest pad)
- B. Removable Seat Back
- C. Shoulder Belt Guide
- D. Seat Back Adjuster
- E. Booster Seat Bottom
- F. Cup Holder

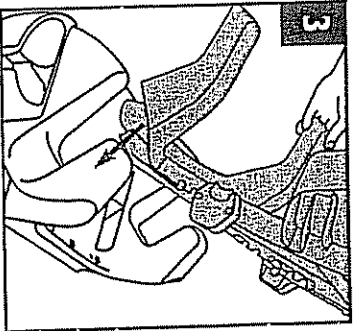
# Preparing Child Restraint



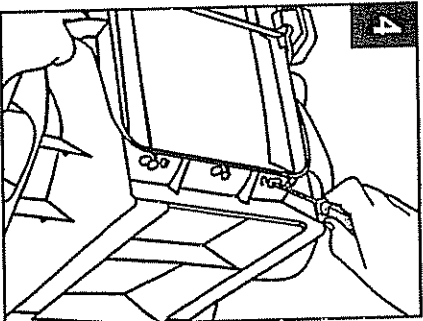
**Install Cup Holder:**  
Turn booster seat bottom upside down. Align screw holes of cup holder to screw holes in side of seat bottom.



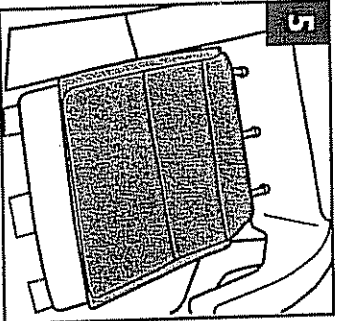
Screw cup holder to seat bottom with 2 #8 screws provided.



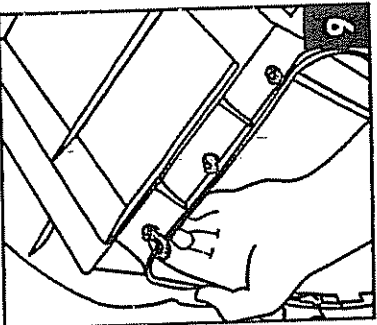
With seat bottom right side up, slide seat back armrests onto base.



Rotate seat back and bottom together to expose the back side and bottom. Secure seat back to bottom with 2 #10 screws.

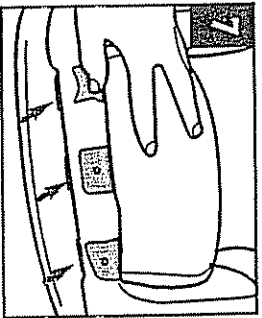


Lay bottom seat pad in shell with tabs on bottom and facing away from seat. Align elastic straps to holes in back of seat. Push straps into holes.

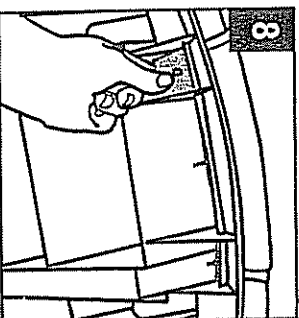


From the back, pull the elastic straps through the holes and hook each elastic strap to a plastic tab.

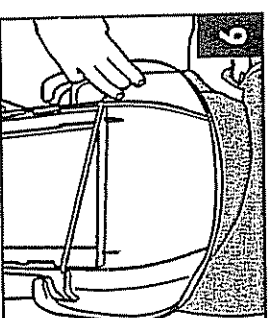




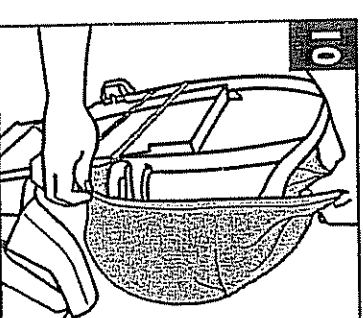
Align tabs on pad with holes in shell. Push tabs into the holes.



Attach the 3 pad tabs to the 3 hooks across the bottom of shell.

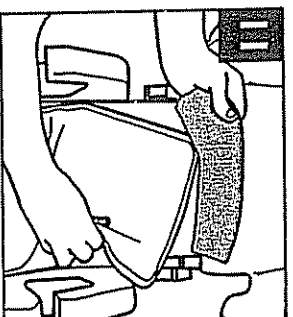


Slide on the elastic straps around the seat back

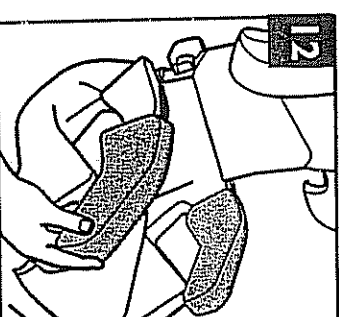


Slide pad over seat back/headrest

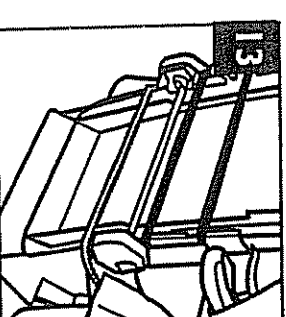
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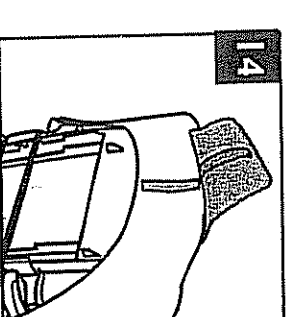
Tuck bottom seat pad back under headrest pad.



Slide armrest covers onto each arm.



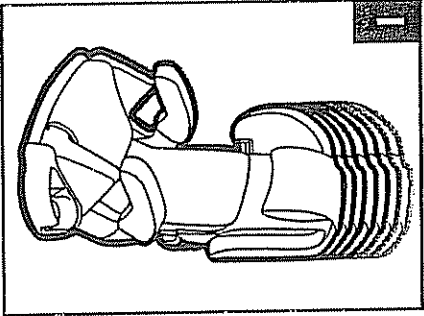
Make sure the elastic straps connecting the covers goes behind the seat back and under both seat back adjusters.



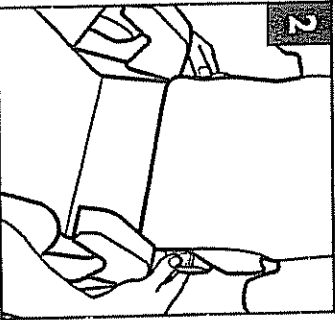
Align fastening strips on pillow with fastening strip on back of headrest. Attach.

13

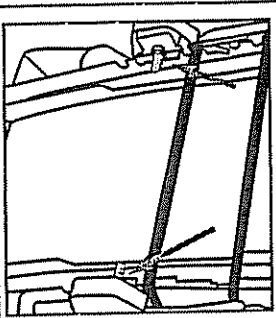
## Headrest Adjustment



1 This child restraint has 7 headrest positions and is also removable.



2 To raise or lower headrest, press both button on the sides of child restraint. Move headrest up or down to desired position.



### **WARNING:**

Make sure pins are locked into position. Failure to do this can result in serious injury or death.

14

## Knowing Your Vehicle Belts

Not all vehicle belts will work with this child restraint. You must determine if your vehicles belts are compatible with this child restraint.

### **ELR - Emergency Locking Retractor Belts**

**Definition:** These belts only lock in a sudden stop or crash. To see if you have this type of belt, pull on the lap belt, let it return part way, then pull on it again. If it moves freely, it is an ELR belt and the child restraint could work loose during normal driving. Refer to your vehicle owner's manual.

ELR lap and shoulder belts may be used when using this seat as belt-positioning booster; no locking clip is required.

### **Automatic/Passive vehicle seat belts**

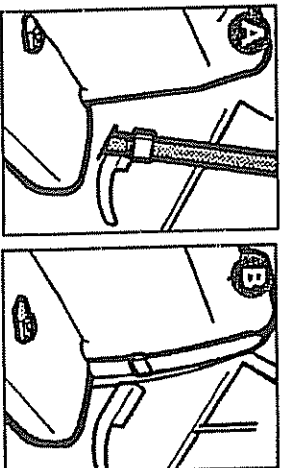
Automatic (passive) 2-point belt has no lap belt. You must install a lap belt to secure a child restraint. You may also need to install an extra lap belt for an automatic 3-point belt. Refer to the vehicles owner's manual. A locking clip will not correct this problem.

### **Vehicle belt too short**

Contact your vehicle dealer for a seat belt extender.

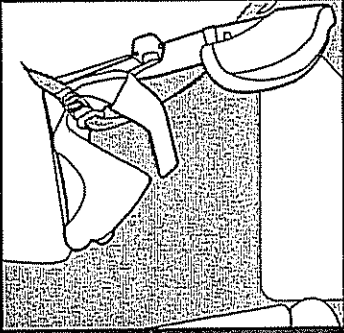
### **Belts in center of the door or side panel (A) or middle of the vehicle seat cushion (B).**

You must move the child restraint to another seating location. A locking clip will not fix this problem.

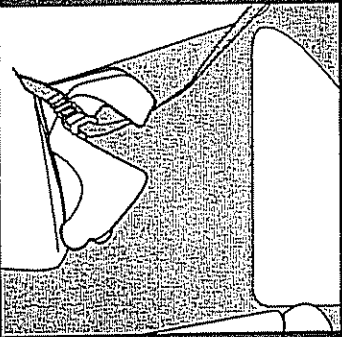


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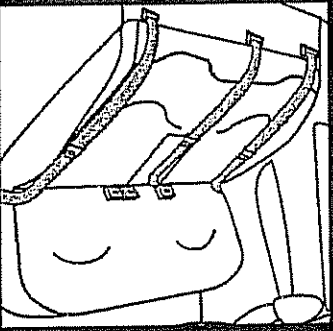
### Belt-Positioning Booster Use



Lap/Shoulder Belt



Lap/Shoulder Belt

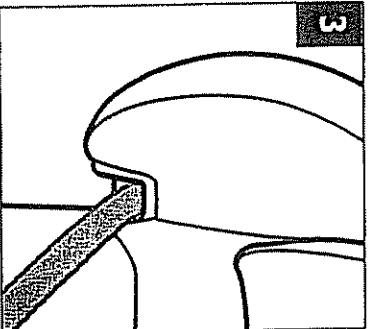
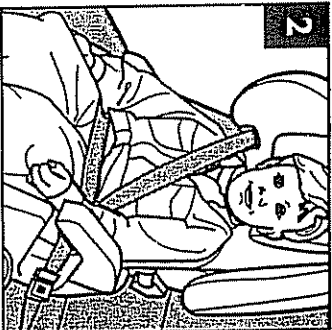
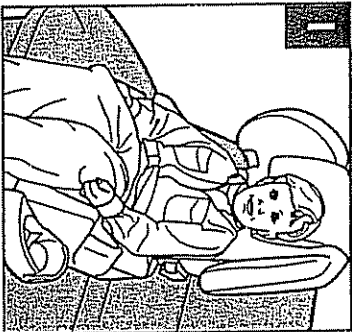


Vehicle lap/shoulder belt combination. Child and child restraint face the front of the vehicle and are placed in the back seat.

Refer to the Weight and Height Chart to make sure your child is at the proper weight and height to use the belt-positioning booster.

Some vehicle belts will not work with a child restraint. See previous page for specific instructions.

### Belt-Positioning Booster: Seat Back Installation



Place child restraint against the back of the vehicle seat. Place the child's bottom and back flat against the child restraint.

Place lap belt across child's thighs. Lock buckle.

**NOTE:** Make sure the lap and shoulder belt are placed under armrest as shown.

Secure the shoulder belt through the notch in the headrest. The belt should cross the base of the child's neck and across the chest (not the face or neck). Adjust headrest as needed (see "Headrest Adjustment" section). Pull up on the shoulder belt to tighten.

Check periodically to ensure your child has not moved out of position and loosened the shoulder belt.

## **WARNING**

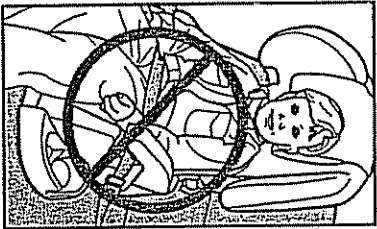
For vehicles with an air bag, but without a back seat, refer to your vehicle owner's manual.

**Do Not Use only the lap belt when using this seat as a belt-positioning booster.**

The shoulder belt must always be adjusted snugly across the child's chest.

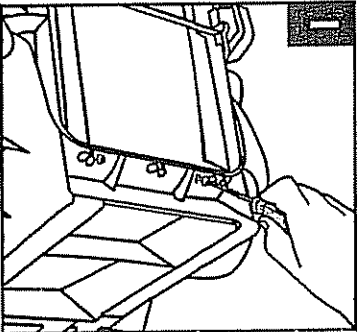
**NEVER** place the shoulder belt under the child's arms.

Failure to follow these warnings could cause serious injury or death to your child.

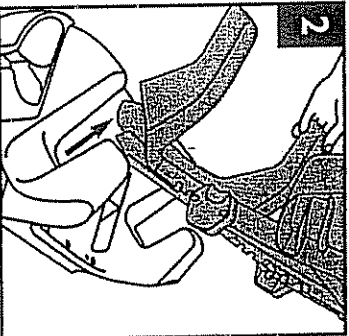


## **Belt-Positioning Booster: Without Seat Back**

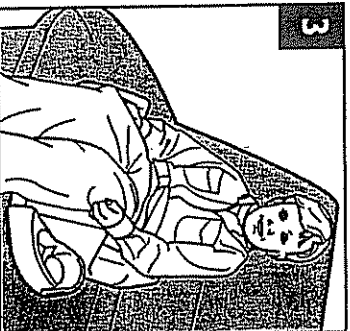
Remove the 2 screws that hold the back to the bottom.

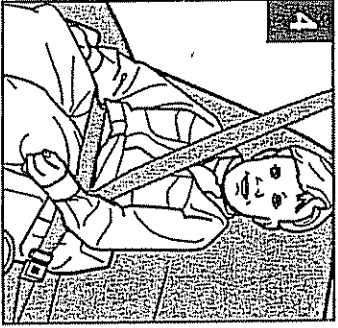


Slide seat back armrests off the base.



Place child restraint against the back of the vehicle seat. Place the child's bottom flat against the child restraint and their back against vehicle seat.





Place lap belt across child's thighs and shoulder belt in front of child as shown. Lock buckle.

**WARNING**

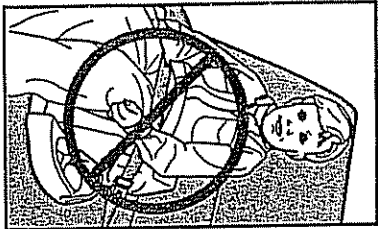
For vehicles with an air bag, but without a back seat, refer to your vehicle owner's manual.

**Do Not** Use only the lap belt when using this booster:

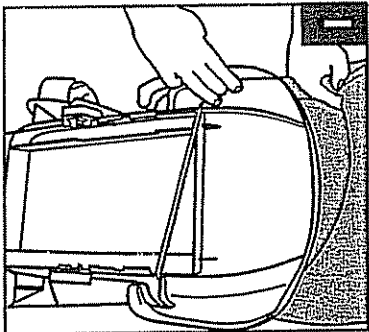
The shoulder belt must always be adjusted snugly across the child's chest.

**NEVER** place the shoulder belt under the child's arms or behind child's back.

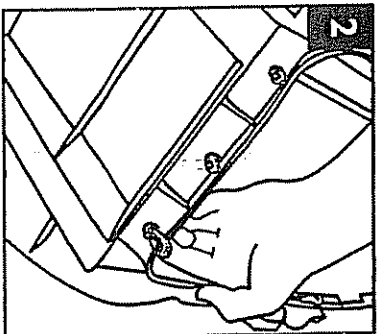
Failure to follow these warnings could cause serious injury or death to your child.



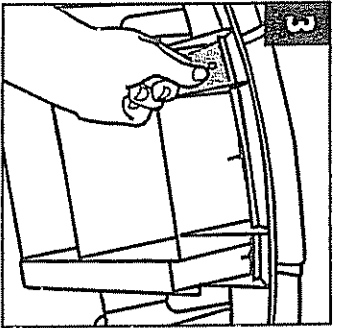
**Removing Seat Pad for Cleaning**



**Remove Headrest:**  
Slide pad off headrest.



**Remove Bottom:**  
Undo elastic from tabs in back of seat.



Undo the 3 tabs from the hooks. Pull bottom off shell.



Slide armrest covers off. Clean with warm sudsy water, rinse clean, air dry. Do not use bleach or other harsh cleaners.

To replace pad, refer to "Preparing Child Restraint"

## Warranty

Dorel Juvenile Group, Inc. (DJG) warrants this product to the original retail purchaser as follows:

This product is warranted against defective materials or workmanship for one year from the date of original purchase. **An original receipt is required to validate your warranty.** DJG will, at its option, provide replacement parts or replace this product. DJG reserves the right to substitute if the part or model has been discontinued.

To make a claim under this warranty you may contact us at [www.djgusa.com](http://www.djgusa.com), fax us at 1-800-207-8182 24 hours a day, write to DJG, Consumer Relations Department, P O Box 2609, Columbus, IN 47201-2609, or call 1-800-544-1108 from 7:00 a.m. to 6:00 p.m. EST Monday through Thursday and from 7:00 a.m. to 4:30 p.m. on Friday. **Proof of purchase is required and shipping charges are the responsibility of the consumer.**

### Warranty Limitations:

This warranty does not include damages which arise from misuse or abuse of this product.

### Limitation of Damages:

The warranty and remedies as set forth are exclusive and in lieu of all others, oral or written, expressed or implied. In no event will DJG or the dealer selling this product be liable to you for any damages, including incidental or consequential damages, arising out of the use or inability to use this product.

### Limitation of warranties and other warranty terms and state law rights:

Any implied warranties, including implied warranties of the merchantability and fitness for a particular purpose, shall be limited to the duration and terms of the express written warranty. Some states do not allow limitations as to how long an implied warranty lasts or the exclusion or limitation of incidental or consequential damages, so the above limitations may not apply to you. This warranty gives you specific legal rights, and you may have other rights, which vary from state to state. Neither DJG nor the dealer selling this product authorized any person to create for it any other warranty, obligation, or liability in connection with this product.

**PLEASE COMPLETE AND MAIL THE PRE-ADDRESSED OWNER REGISTRATION CARD WITHIN (30) DAYS OF PURCHASE TO EXPEDITE WARRANTY CLAIMS AND TO VERIFY THE ORIGINAL DATE OF PURCHASE**

# Replacement Parts Order Form

Complete the form below. Your model number with color code and manufacturer date code MUST be included on the form to ensure proper replacement parts. Your model number with color code and the date code can be found on a sticker on the side of child restraint. Payment in U.S. dollars must accompany your order. Choose parts needed from the list below or from the accessory Quick Shop form included with your child restraint. Return the form with payment to:

**Dorel Juvenile Group, Inc.**  
**Consumer Relations Department**  
**P.O. Box 2609**  
**Columbus, IN 47202-2609**

Fax orders to: 1-800-207-8182  
Please make money orders payable to Dorel Juvenile Group, Inc. Fill in the area below to charge to Visa or Mastercard. We do not except personal checks or Discover Card. All outside of U.S. and Canada MUST use credit card.

Ship To (Please Print): \_\_\_\_\_  
Name: \_\_\_\_\_  
Address: \_\_\_\_\_  
City: \_\_\_\_\_  
State/Province: \_\_\_\_\_ Zip \_\_\_\_\_  
Telephone: \_\_\_\_\_  
Email Address: \_\_\_\_\_

**We MUST have this information to process your order:**  
**Model Number (5 digits & 3 letters):** \_\_\_\_\_  
**Manufacture Date (mm/dd/yyyy):** \_\_\_\_\_