

INFORMATION Redacted PURSUANT TO THE FREEDOM OF
INFORMATION ACT (FOIA), 5 U.S.C . 552(B)(6)

To: Ms. Angel M. DeFilippo, Esq.
Grieco Oates & DeFilippo, LLC
414 Eagle Rock Avenue
West Orange, NJ 07052
973-243-2099

Date: 7 June 2012

VIA FEDEX GROUND (1283181-00003629) AND EMAIL

From: Mr. Paul V. Sheridan
DDM Consultants
22357 Columbia Street
Dearborn, MI 48124-3431
313-277-5095
pvs6@Cornell.edu

Subject: Defense / Discovery Counsel Challenges to Document Origin and Availability

Reference 1: David Dillon Deposition of 7 June 2012: Kline v Lomans Auto Group, et al.

Reference 2: The *"tell NHTSA to pound sand"* memo authored/endorsed by Chrysler Executives

Courtesy Copy List

The Honorable David L. Strickland
Administrator
NHTSA Headquarters/West Building
1200 New Jersey Avenue, SE
Washington, DC 20590
888-327-4236

Mr. Sergio Marchionne
Chairman
Chrysler Group LLC
1000 Chrysler Drive
Auburn Hills MI 48321-8004
248-576-5741

Mr. Clarence Ditlow, Director
Center for Auto Safety
Suite 330
1825 Connecticut Ave, NW
Washington, DC 20009-5708
(202) 328-7700

Mr. Lawrence Hershman
NHTSA Headquarters
West Building
1200 New Jersey Avenue, SE
Washington, DC 20590
888-327-4236

Mr. Russell J. Sacco, Jr.
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6 Claremont Road
Bernardsville, NJ 07924
908-953-0300

Mr. Courtney E. Morgan, Jr.
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3200 Greenfield Road
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22357 Columbia Street
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7 June 2012

BY FEDEX GROUND (1283181-00003629) AND EMAIL

Ms. Angel M. DeFilippo, Esq.
Grieco Oates & DeFilippo, LLC
414 Eagle Rock Avenue
West Orange, NJ 07052
973-243-2099

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Reference 1: David Dillon Deposition of 7 June 2012: [REDACTED] v Lomans Auto Group, et al.
Reference 2: The ***"tell NHTSA to pound sand"*** memo authored/endorsed by Chrysler Executives

Dear Ms. DeFilippo:

You have indicated that defense and discovery counsel, who were present at Reference 1, challenged the origins and availability of an exhibit entered into the Kline case record during plaintiff's examination of Mr. [REDACTED]. Their challenge relates to the ***"NHTSA pound sand"*** letter written by Chrysler Vice Chairman Thomas Denomme to Chairman Robert Eaton and President Robert Lutz.

I am confused by this challenge since it is well-known to Chrysler counsel that this [REDACTED] deposition exhibit was part of a series of documents (of similar content and tone) that were presented to the jury in the death case litigation of [REDACTED] v. *Chrysler Corporation*. It is well-known to Chrysler counsel that I testified over a period of three days in October 1997 as plaintiff's expert in [REDACTED] and contributed to a record jury verdict of \$262,500,000.00. This verdict was featured in a front-page article of the Wall Street Journal on November 30 1997.

In other words, the subject documents, which depict what many consider criminal activity on the part of Chrysler executive management and their defense counsel, have been notoriously public for over 14 years.

By way of background, and exemplifying the true status of the exhibit, NHTSA had reported to Chrysler executives the following on November 17, 1994:

"The latch failure is a safety defect that involves children."

It is well-known that the exhibit that Chrysler counsel is now feigning as "confidential" were featured on a prime-time *CBS Evening News* program. I am enclosing a DVD copy of that broadcast of January 7, 1998. In that nationally televised program, *CBS News* anchor Anthony Mason quoted paragraph 9 of that exhibit; documenting the secret Chrysler plan regarding the NHTSA "safety defect" report quoted above:

"If we (Chrysler) want to use political pressure to try to squash a (NHTSA) recall letter, we need to go now."

A superficial and/or trivial analysis of this historical information might render it off-point. But, as the real world has once-again demonstrated, this managerial historical behavior with-respect-to safety is directly relevant to the Kline litigation, the defective fuel system of the 1993 through 2004 Jeep Grand Cherokees, and the current NHTSA PE-100-31 investigation into the latter (Please see 'Conclusion' below).

7 June 2010

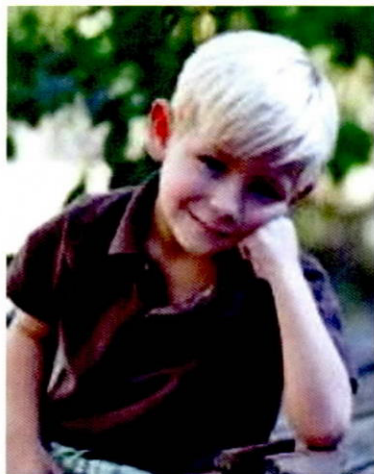
Ms. Angel M. DeFilippo, Esq.
Page Two of Two

You have indicated that defense and discovery counsel, who were present at Reference 1, also challenged the "sharing" of this Dillon deposition exhibit. That is absurd.

Attachment F - Tab 16 is attached. This is unchanged from my original expert report of 6 December 2009. Due to case record changes, case rulings, defense expert report inclusions, mid-stream replacement of defense counsel by defendant Loman, etc., I have reacted in-kind and on-point with updates to my report. However, at no time has Attachment F - Tab 18 been deleted or revised in any way.

During plaintiff's examination of Mr. Clarence Ditlow on 31 May 2012, defense counsel openly boasted that he had Attachment F - Tab 16. Touting his iPad, Mr. Chris Fusco declared, *"I have the entire case right here!"* In other words, the very same defense counsel, that is challenging the origins and availability of an exhibit, had, one week earlier, openly confirmed his knowledge of the origins and availability of that exhibit . . . as well as its "sharing."

Conclusion: Relevance of [REDACTED] Deposition Exhibit to [REDACTED] and NHTSA Investigation PE-100-31



Given prior criminal behavior during NHTSA safety defect investigations, it is predictable that Chrysler would object to inclusion of the **"NHTSA pound sand"** exhibit into the [REDACTED] record. Again, this historical behavior is also relevant to the [REDACTED] litigation, as well as to the NHTSA fuel system defect investigation of the Jeep Grand Cherokee.

Pictured at right is 4-year-old [REDACTED]. The details of his fire-death in a Jeep Grand Cherokee on 6 March 2012 are too horrific to document here. But [REDACTED] death can be directly connected to the historical behavior documented in the **"NHTSA pound sand"** exhibit.

Specifically, paraphrasing the 1994 NHTSA quote above, *the Jeep Grand Cherokee fuel system failure is a safety defect that involves children . . .*

It should be noted that the executive vice president that has been deposed in [REDACTED] and was responsible for the design and production of the Jeep Grand Cherokee, was also central to the internal Chrysler meetings and discussions as documented in the **"NHTSA pound sand"** exhibit.

Respectfully,

Paul V. Sheridan

Enclosures: DVD copy of CBS Evening News program of January 7, 1998.
Attachment F - Tab 16 from Paul V. Sheridan expert report of 6 December 2009

Attachment 1

Ms. Angel M. DeFilippo, Esq.
7 June 2010

Subject: Defense / Discovery Counsel Challenges to Document Origin and Availability
Reference 1: [REDACTED] Deposition of 7 June 2012: [REDACTED] v Lomans Auto Group, et al.
Reference 2: The *"tell NHTSA to pound sand"* memo authored/endorsed by Chrysler Executives

DVD copy of CBS News Program "Eye on America" of November 7, 1998 (included with hard copy)

Video link here: http://www.youtube.com/watch?v=Fp19qR_juOg

Attachment 2

Ms. Angel M. DeFilippo, Esq.
7 June 2010

Subject: Defense / Discovery Counsel Challenges to Document Origin and Availability
Reference 1: [REDACTED] Deposition of 7 June 2012: [REDACTED] v Lomans Auto Group, et al.
Reference 2: The "*tell NHTSA to pound sand*" memo authored/endorsed by Chrysler Executives

Attachment F - Tab 16 unchanged from Paul V. Sheridan original expert report of 6 December 2009, includes the "*tell NHTSA to pound sand*" memo authored/endorsed by Chrysler Executives.

ATTACHMENT F

EXPERT WITNESS REPORT

[REDACTED] v. Loman Auto Group, Victoria Morgan-Alcala, et al.

T A B 16

██████ et al. vs. Chrysler

Robert J. Eaton

August 28, 1997

Freelance Court Reporters (810) 779-1800

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1 the assumption that we will eventually be
2 requested to do a recall."
3 Q Thank you.
4 A That's a totally different statement than what
5 we were just talking about, our operating under
6 the assumption.
7 Q You were assuming -- I tried to use his words in
8 my prior questions but you were assuming back in
9 December of '94 -- strike that.
10 In December of '94, you were continuing
11 to operate under the assumption that you would
12 eventually be requested to do a recall, correct?
13 A That's what this says and there's no question
14 that's one of the situations that we were
15 dealing with, but there was also --
16 Q And did you think about -- strike that.
17 But if you thought you were going to have
18 to at some point do a recall, did it occur to
19 you that perhaps you should be letting consumers
20 know sooner rather than later that there may be
21 a problem with their car?
22 A There was no defect. You must understand that.
23 There wasn't any, there isn't any. There was
24 nothing to notify.
25 Q And, well, NHTSA was going to find a defect if

1 Q (BY MR. GERSTEIN): Well, if you look at the
2 attached document, it's dated March 3, 1995?
3 MR. MILLER: As you representing the
4 these two documents were in fact attached to
5 each other?
6 MR. GERSTEIN: I am unable to do that
7 of my own knowledge. They are attached in our
8 files, but I'm not going to say they're dated
9 stamped consistently with it not going to
10 MR. MILLER: I appreciate your answer and
11 also as long as we're talking about the
12 documents --
13 MR. GERSTEIN: While I'm being candid,
14 though, I will tell you, I don't have the
15 slightest doubt that the first two pages were
16 done in or about March of '96.
17 MR. MILLER: That may be your conclusion.
18 But there's obviously no date on the document,
19 which first pages.
20 THE WITNESS: My recollection is that
21 this investigation wasn't concluded for a long
22 time after that. 3:48:34
23 Q (BY MR. GERSTEIN): Okay. Well, look at No. 2,
24 paragraph two. Do you see where it says, "NHTSA
25 has agreed that a Chrysler service campaign

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1 you didn't strike a deal with them, right?
2 A Absolutely not. 3:44:40
3 Q Okay. Let me show you Exhibit 21. The title of
4 the document is Minivan Latch Issue Proposed
5 Agreement with NHTSA. Do you see that?
6 A Yes, sir, I do.
7 Q In paragraph one, you all got NHTSA to agree
8 that they would deny all Freedom of Information
9 Act requests to place their investigative files
10 including the crash test video in the public
11 record and that the Justice Department would
12 defend any lawsuits seeking to compel production
13 under the Freedom of Information Act; is that
14 correct?
15 MR. MILLER: Objection, lack of
16 foundation.
17 THE WITNESS: If you are reading?
18 (BY MR. GERSTEIN): The first paragraph of this
19 document. 3:46:00
20 A FOIA.
21 Q Freedom of Information Act.
22 A Okay.
23 Q In other words, you all got NHTSA to agree that
24 they would keep or fight the public in finding
25 out what their crash test video showed, correct?

1 would fully satisfy all their concerns?"
2 A Yes.
3 Q (BY MR. GERSTEIN): What service
4 campaign would that be?
5 MR. MILLER: Objection, Relevance, Speculation,
6 so of what date?
7 THE WITNESS: You know, I didn't discuss 44:11
8 any of this with them.
9 VIDEO: Questioned Exhibit 21, Freedom of Information
10 Act request, dated March 3, 1995, from NHTSA to
11 Chrysler, asking for production of all documents
12 relating to the Minivan Latch Issue.
13 MR. GERSTEIN: That's fine.
14 Q (BY MR. GERSTEIN): When you finished answering
15 because I'll go on. If you want more to say,
16 I'll not interrupt you. But I'm going to ask
17 you to answer the pending question.
18 Do you see where it says, "NHTSA has
19 agreed that a Chrysler service action would
20 fully satisfy all their concerns and they would
21 give full public support to such an effort?"
22 A Yes, sir, I do.
23 Q Do you see where it says, "The critical elements
24 that differentiate the service action from a
25 recall (mostly reflected in the" -- attached --

Page 105

Page 108

1 MR. MILLER: Objection, lack of
2 foundation as to this witness.
3 THE WITNESS: That was while the
4 investigation was going on, I assume. Obviously
5 they were ultimately released, so there wasn't
6 -- you know, I don't know.
7 Q They were released. I think there was a lawsuit
8 to get them, but in any event, are you aware of
9 any deals being struck with NHTSA?
10 A I do recall -- no, I'm not. I clearly remember
11 that we were continually -- this investigation
12 was hampered by leaks in various sensationalism
13 in the press -- sensationalist press and we
14 wanted all the facts to get out there and
15 obviously all the data so that a proper
16 conclusion could be made, and there isn't any
17 doubt that we would not want to see pieces of
18 the information get out until the investigation
19 was complete, but I'm not familiar with, you
20 know, exactly what happened.
21 Q Well, this is at the time the investigation was 3:47:33
22 effectively complete, wasn't it?
23 MR. MILLER: Objection, lack of
24 foundation.
25 A THE WITNESS: What is the date?

1 "the two attached letters) are as follows." Do
2 you see that?
3 A Yes.
4 Q And then it says, "No admission of defect or
5 safety problem." Do you see that? Do you see
6 where it says, "Stated purpose of the campaign -
7 to ensure piece of mind in light of media
8 coverage?"
9 A I can assure you that was exactly what the
10 safety action was all about.
11 MR. GERSTEIN: I'm going to ask you to agree it would
12 not count as a safety action if it would not be
13 included in the recall, correct?
14 MR. MILLER: Objection, lack of
15 foundation as to this witness. You cannot find
16 what the document says, period, but in all due
17 respect, you haven't established that he ever
18 saw it.
19 MR. GERSTEIN: That's a fair point.
20 Q (BY MR. GERSTEIN): Did you ever see this
21 document?
22 A No, sir, I don't believe so.
23 Q Were you consulted by your company concerning
24 this document?
25 Were you consulted by executives in your



Robert J. Eaton
Chairman of the Board
Chief Executive Officer

March 30, 1995

The Honorable John D. Dingell
House Commerce Committee
2125 Rayburn House Office Building
U. S. House of Representatives
Washington, DC 20515

Dear Congressman Dingell:

I want to thank you for your personal involvement on behalf of Chrysler and other auto manufacturers regarding the NHTSA defect investigation process. I believe your oversight of NHTSA has played a significant role in causing NHTSA to alter its mindset as well as its processes in its handling of complex safety investigations. We at Chrysler intend to continue to speak out on this issue and hope you will continue your probing for an improved investigatory process.

I also want to provide you some insight on our recent decision on the minivan latch issue. As you are no doubt aware, with great reluctance we decided on March 27 to initiate a service campaign for our minivan owners, offering them a replacement rear door latch for model years 1984 through 1994. This decision was based solely on our determination that Chrysler minivan owners had become so misled by outrageous media sensationalism of this issue that further delay in adjudicating this investigation with NHTSA would be harmful to the company. It became necessary to put customer concerns first over our absolute insistence that no safety issue actually exists.

I have never doubted that NHTSA's evaluation of the facts in this matter would eventually conclude in their closing the case without an adverse finding. But to reach that conclusion would take many more months during which our exposure to continuing media barrages would not be abated.

It is regrettable that the NHTSA investigative process is wholly deficient in protecting the rights and reputations of manufacturers where there are: (1) large numbers of vehicles involved; (2) complicated technical issues; and (3) post facto and subjective determinations by NHTSA of on-road crashworthiness safety performance. I want to assure you that Chrysler will work diligently for changes to bring fairness to this system. I hope you will continue your invaluable oversight efforts to that end.

Thank you again for your support.

Sincerely,



Robert J. Eaton
Chairman of the Board
Chief Executive Officer

March 30, 1995

The Honorable Michael G. Oxley
Chairman-Subcommittee on Commerce,
Trade and Hazardous Materials
House Commerce Committee
2125 Rayburn House Office Building
U.S. House of Representatives
Washington, DC 20515

Dear Mr. Chairman:

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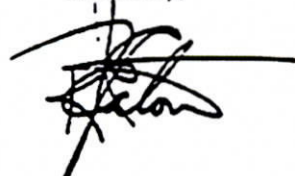
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Thank you again for your support.

Sincerely,



T. G. DENOMME

December 13, 1994

R. J. Eaton
R. A. Lutz
R. R. Boltz
F. J. Castaing
T. R. Cunningham
D. E. Dawkins
L. H. Goldfarb
S. J. Harris
T. J. Kowaleski
A. C. Liebler
C. P. Theodore
G. C. Valade

Attached is the agenda for the Minivan Latch meeting
scheduled for 3 p.m. today in the Keller Building Conference
Room A.

/bw



| | | |
|--|--------------|----------------|
| Post-It™ brand fax transmittal memo 7671 | | # of pages > 2 |
| To KOWALESKI | From DENOMME | |
| Co. | Co. | |
| Dept. | Phone # | |
| Fax # 8-776-7947 | Fax # | |

TH002786

REDACTED DOCUMENT

MINIVAN LATCH ISSUES
AGENDA

DECEMBER 13, 1994

| <u>Topic</u> | <u>Discussion Leader</u> | <u>Time</u> |
|---|--------------------------|-------------|
| • Opening Comments | Denomme | 5 minutes |
| • Update Since Last Meeting | Dawkins/Goldfarb | 10 minutes |
| • Report on Latch Status for Field Campaign | Theodore | 10 minutes |
| [REDACTED] | [REDACTED] | [REDACTED] |
| • Review of Communications Plans for a NHTSA Confrontation | Liebler | 30 minutes |
| • Review of Focus Group Research | Liebler | 10 minutes |
| • Discussion of Combined Offer to Replace/ Confrontation Strategy | Denomme | 10 minutes |
| • Political Strategy | Liberatore | 10 minutes |
| • Business Decision | Group | 20 minutes |

1 hour, 50 minutes

12/13/94

TH002785

DOCUMENT PRODUCED
IN JIMENEZ V. CHRYSLER
T. G. DENOMME

Vice C
December 9, 1994

R. J. Eaton
R. A. Lutz

Re Point #1 ... we've been talking to The Detroit News today re holding their latch story. Bud has worked out an arrangement whereby they will not run the story this weekend and we will agree to give them a one-day lead if we decide to do a customer-friendly action only (a voluntary recall).

If we decide to take on NHTSA, they understand that we will need to involve all media in that decision.

It should be noted, however, that if there are more leaks, or someone else breaks this story, then the News will go with theirs.

TGD:bw



TD000099

Confidential and Privileged

REDACTED
DOCUMENT

T. G. DENOMME

December 9, 1994

R. J. Eaton
R. A. Lutz

MINIVAN LATCH MEETING

A preview of next Tuesday's meeting:

1. Bad News ... Yesterday we received a call from Bryan Gruley (Detroit News Washington Bureau) who told us he and Bill Vlasic are working on a story for this weekend on the "raging debate within Chrysler on whether to recall the vans or take on NHTSA". This story, which may go on the Gannett wire (USA Today) will generate customer and dealer concerns, and could force NHTSA to dig in. Don't know the source, but the fact that their Washington Bureau got on it suggests either a NHTSA or a Consumer Advocacy source.
2. NHTSA Situation ... There was little discussion on our technical presentation last Monday. The consensus is that the new data we presented has bought us a little time ... there will probably be another technical session to discuss NHTSA's reaction to our data ... but it's unlikely we have changed their minds. Accordingly, we will continue to operate under the assumption that we will eventually be requested to do a recall.
3. Latch Fix ... Chris Theodore will update us. Because we have chosen not to contact external suppliers, our cost/timing estimates are very rough. But Chris will likely report that we could have some quantity of latches available for '91 to '94 models by early spring, and the new latch for the pre-'91 models in about nine months. I do not know where we stand on costs.
4. Take On NHTSA Strategy ... Tom Kowaleski will take us through a "script" for a media conference laying out our case. Bud Liebler will review the ads developed in conjunction with a decision to fight a recall. We will also review dealer/customer communication materials.
5. Research ... We are doing some focus group testing of the take-on-NHTSA approach. No one has seen the results yet, but early indicators are that customers "tune out" statistical arguments about accidents, fatalities, latch pull tests, etc., and focus on "what's Chrysler going to do to address customer concerns". There is no doubt that Chrysler has a special image and relationship with minivan customers when it comes to safety.
6. A Third Approach ... In addition to the voluntary recall path and the take-on-NHTSA path, a third path melding elements of a voluntary recall and a take-on-NHTSA approach will be discussed. Essentially, we would seize the high ground by going out with an offer to replace the latch for any of our owners who request a replacement (note this wording ... it is much softer and less urgent than the language NHTSA insists on under their recall procedure) and, at the same time, tell NHTSA to "pound sand". The obvious benefit of this approach is that we address our customer concerns without admitting to a defect (because there is no defect) and simultaneously engage NHTSA in the fight over principle.

TD000100

REDACTED
DOCUMENT

[REDACTED]

I should also point out that we have several other important cases under investigation by NHTSA, including minivan brakes, that we need to keep in mind before we engage them in a fight.

7. [REDACTED]

8. Recommendations ... There continues to be a divided house on what we should do once we know that NHTSA will send us a letter.

- Sales/Marketing ... Wants us to address customer/dealer concerns and prefers a voluntary field campaign to a public fight on principle.
- Public Relations ... Agrees with Sales.
- Engineering ... Prefers we take on NHTSA.
- Regulatory Affairs ... Prefers we take on NHTSA (but is supportive of the third alternative described in point #5).
- [REDACTED]
- Washington Office ... [REDACTED] but also sees some advantages to the third alternative.

9. Final Point ... Rob Liberatore makes the point that, regardless of what course of action we take, we should mount an aggressive effort in Washington to prevent the adverse use of bureaucratic power within NHTSA, specifically their funding from Congress, the process which allows NHTSA to design tests for the public record that play to the media and trial lawyers before ruling on a defect, the lack of objective criteria in determining whether a recall request is to be made, and the very fact that they can request a recall before establishing that a defect exists. I could not agree more.

If we want to use political pressure to try to squash a recall letter, we need to go now. We cannot expect to be successful if we don't activate until we are officially notified that a letter is coming. Of course, the risk of early action is that it may preclude NHTSA from exercising a close-the-case option.


T. G. Denomme

TGD:bw

TD000101

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VOL. 13, NO. 9

OAKLAND COUNTY'S AUTO INDUSTRY AND BUSINESS NEWSPAPER

MARCH 6, 1995

CUSTOM FIT

The Detroit Transportation Club hosted a U.S. Customs Service Special Agent at their February luncheon — he spoke on customs fraud, its application to shippers and the responsibilities of all parties involved.

See CUSTOMS, page 2 ▶

DEALERSHIP LOYALTY

Along with improved customer satisfaction, that's what Chevrolet is trying to promote with its new Career Builders program that honors salespeople who stay at dealerships for more than three years.

See CHEVROLET, page 6 ▶

MOTOWN HOEDOWN

The Motown Museum hosted its annual fund-raising dinner and dance last week to help with renovation of the old Hitsville USA studio on West Grand Boulevard in Detroit's New Center Area.

See PARTY, page 6 ▶

CLEAN AND CLEAR

Orbital Engine Co. has long said it would provide automakers with an alternative to the four-stroke engine with its two-stroke, however, U.S. emissions standards have stood in the way of the in-

EATON ATTACKS FEDERAL REGULATIONS

By Scott Roush
Staff Writer

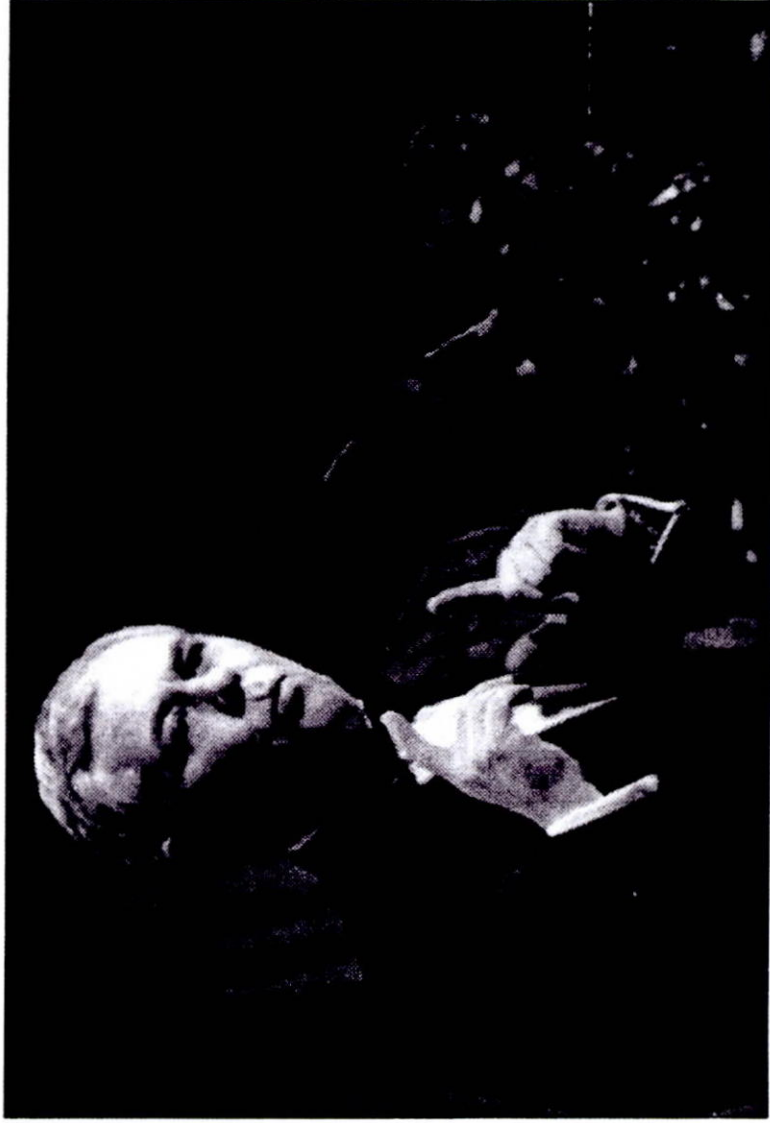
Chrysler Corp.'s Chairman Robert Eaton wrapped up the 1995 SAE International Congress and Expo with a speech that criticized the federal government for regulations stifling the growth of the auto industry.

From voluntary recalls and workplace streamlining to the average cost of today's vehicle, Eaton questioned the government's role in regulating business during his "Engineering for Value" presentation.

But Eaton did approve of what some of the government is doing. The Chrysler boss praised House Speaker Newt Gingrich and other Republicans' attempts to reduce some of the bureaucracy in Washington through the "Contract with America."

Eaton discussed how the automotive industry has reduced its workforce since 1950 and how the federal government has failed to reduce its workforce over the same time period. This, according

See EATON, page 4 ▶



CHRYSLER CHAIRMAN Robert Eaton's speech at the SAE Congress and Expo banquet at Cobo Center was critical of the number of industry regulations coming from Washington.

science and technology on March 6 from noon -1 p.m. Call (810) 370-3574.

QUALITY WORKSHOPS A nine-week workshop. Improving Productivity Through Statistical Quality Control, starts March 20, from 6-9 p.m. at Oakland University. Another workshop at OU, Improving Customer Satisfaction Through Process Control and Quality Planning, starts March 21 from 6-9 p.m. Call (810) 370-3120.

"LOVE LETTERS" St. Dunstan's Guild of Cranbrook presents "Love Letters" by A. R. Gurney March 10, 11, 17 and 18. This performance piece delivers letters exchanged over a lifetime between two people who grew up together, went their separate ways but continued to share confidences. The show starts at 8 p.m. in St. Dunstan's Playhouse in Bloomfield Hills. Call (810) 644-0527.

VOLUNTEERS NEEDED The Oakland County Retired and Senior Volunteer Program (RSVP) seeks volunteers 55 years and older to become involved with community agencies who need assistance. Varied opportunities are available at schools, hospitals, libraries, human service agencies, and cultural institutions throughout Oakland County. Contact Linda Kaniewski at (810) 333-3716 ext. 115.

CHILD SAFETY "Northwest Troy Partnership Talks Safety" will be presented March 8, 7-9 p.m. at Hamilton Elementary School on Northfield Parkway in Troy. Presentations by members of the Troy Police Department will include: home security, bike safety, how to use your police department, K-9 officers, child safety and personal safety. Admission is free. Call (810) 740-0431.

MUSICAL CELEBRATION Inspired by stories from and about the AIDS Memorial Quilt, "Quilt, A Musical Celebration" fills the theater with images of laughing, living, leavetaking and love. The show takes the stage March 10 and runs for three consecutive weeks. Call (810) 370-3013.

CANCER PROGRAM Crittenton Hospital in Rochester and the American Cancer Society are sponsoring a four-week "I Can Cope" program that began Feb. 22 and continues for four consecutive weeks. "I Can Cope" will be

tax strategies. Featured speakers include Peter Bewrthy, Richard Falck and Davis Senatore, financial consultants. The seminars will take place at the Columbia Center in Troy across from the Troy Marriott. Call (810) 227-1931.

"ROYAL TOMBS OF SIPAN" This heralded exhibit will be on display at the Detroit Institute of Arts from now through April 30. Tomb robbers unearthed treasures from a pyramid near Sipan, Peru, and flooded the international art market with gold and silver artifacts. The exhibit features exquisite gold and silver jewelry, semi-precious stones and other artifacts excavated from the richest tombs ever explored in the Americas. Call (313) 833-2323.

BIRDS OF PREY Join an expert ornithologist for a talk featuring live Michigan wildlife March 14, 7-8 p.m., at Edsel and Eleanor Ford House. Special guests could include a Barn Owl, Red-tailed Hawk and American Eagle, among others. Suitable for adults and children 6 and older. Admission is \$3. Call (313) 884-4222.

AUTOMOTIVE MAGNESIUM The International Magnesium Association is sponsoring an educational seminar on magnesium in automotive applications, Apr. 4, 8 a.m.-4 p.m., at Laurel Manor, 39000 Schoolcraft in Livonia. There is no charge for attending the seminar. Form reservations call (703) 442-8988.

RAPID PROTOTYPING Register now for the Rapid Prototyping & Manufacturing '95 Conference and Exhibition, May 2-4, at the Hyatt Regency in Dearborn. The event, sponsored by the Society of Manufacturing Engineers, will feature 60 exhibitors and 40 conference presentations. Keynote speaker is Mary L. Good, undersecretary of technology at the U.S. Department of Commerce. For more information call 1-800-733-4763.

MANAGING DIVERSITY The University of Michigan-Dearborn's Center for Corporate and Professional Development helps you update your managing skills. The CCPD will be offering a course on "Diversity: Awareness & Understanding" March 20 and 21, 8 a.m.-5 p.m. The cost for this interesting program is \$536 per person. Call

Eaton Says Governmental Regulations Negatively Impact Industry's Progress

From page 1

to Eaton, just one way the auto industry has streamlined and the government hasn't.

In 1978, the auto industry was at its peak employment at 1 million workers. That same year the federal government employed 2.8 million civilians. "Today the automotive industry has reduced its workforce to 575,000," he said. "What happened to those 2.8 million federal employees in the meantime? They grew by 100,000 (almost) the size of Chrysler Corp.)."

Eaton also talked about process. "We figured out a few years ago that managing the process makes a lot more sense than just trying to manage the outcome," he said. "That's how we cut our workforce so much and got so productive."

Eaton continued by saying that no industry is more heavily regulated than the auto industry. He added that because the industry is so visible, there is no better target when the government pursues a crusade like voluntary recall.

Voluntary recall is negative for the industry, Eaton said, because of the bad public relations that go with a product recall.

"If you do what the government asks you to do, in the eyes of the public you must have a faulty product," he said. He referred to the dispute General Motors had concerning its pickup trucks as a prime example of where the au-

tomaker faces a no-win situation in public opinion.

Chrysler might be in a similar situation with one of its vehicles. Reports have criticized the car company for flawed rear door latches on its best-selling minivans from 1985-94.

"The cost and the risk of doing them are too great for many companies to even contemplate," Eaton said of the agencies who regulate the industry.

Regardless, today's auto workers are more productive than in the past because of better management according to Eaton. In 1978, the industry produced 13 vehicles per employee. This year that figure is 21 vehicles per employee.

"We can continue this process," Eaton said of the improved production.

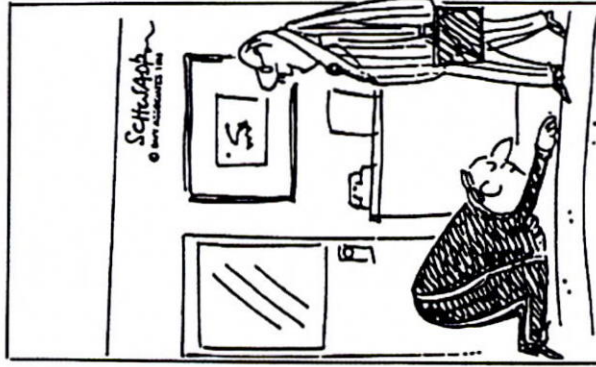
The federal government announced that the average price of a 1995 vehicle rose to approximately \$20,000. Eaton said the government failed to include incentives when it calculated those figures, but that number could soon be reached due to government regulations.

"The public mood is decidedly anti-Washington, and that means the appetite for more rules and regulations is just about gone," Eaton said.

The auto industry itself needs to improve the affordability of cars, but with governmental interference it will be difficult to

promote "Engineering for Value" according to Eaton.

"The future profits have to come from the product instead of the customer," he said. "Costs have to be engineered out, and they have to come out without compromising product integrity."



"I like religious fanatics, Sims—especially when they worship me."

END OF DOCUMENT

Ms. Angel M. DeFilippo, Esq.
7 June 2010

Subject: Defense / Discovery Counsel Challenges to Document Origin and Availability
Reference 1: [REDACTED] Deposition of 7 June 2012: [REDACTED] v Lomans Auto Group, et al.
Reference 2: The "*tell NHTSA to pound sand*" memo authored/endorsed by Chrysler Executives
