

SERVICE ACTION TO REPLACE YOUR MINIVAN'S LIFTGATE LATCH

Dear Minivan Owner:

As we stated in our previous letter, peace of mind among our minivan owners is very important to Chrysler. We also said that we would notify you when a stronger liftgate latch was available for your minivan. We are now requesting owners of 1988 through 1995 Dodge Caravan and Plymouth Voyager minivans equipped with a manually (key only) operated liftgate latch to return their vehicles to their dealer for replacement of the liftgate latch. All 1984 through 1995 model vehicle owners will ultimately be contacted as the appropriate replacement parts become available for their vehicles.

The issue is...

The liftgate latch on your minivan (identified on the enclosed form), may be forced open in certain crash situations. The new latch is stronger than the current latch in your minivan, and will reduce the chance of the liftgate opening in these situations. It is essential that you have the stronger latch installed in your vehicle in order to lessen the possibility of an unbelted passenger being ejected in the event of a crash.

What Chrysler and your dealer will do...

Chrysler will replace the liftgate latch assembly on your minivan with a stronger latch. This service will be provided free of charge (parts and labor). The work will take about one hour to complete. However, additional time may be necessary depending on how dealer appointments are scheduled and processed.

What you must do...

- We urge you to contact your Dodge or Chrysler/Plymouth dealer to schedule a service appointment. Ask the dealer to hold parts for your vehicle or to order them before your appointment.
- Bring the enclosed Owner Notification Form with you to your dealer. It explains the required service to your dealer.

If you need help...

If you have any trouble getting your vehicle serviced, please call us, toll free, at 1-800-Minivan (644-4888). A representative will assist you in getting your latch replaced. Also, if you have any concerns regarding this service action, you may call the National Highway Traffic Safety Administration (NHTSA) Toll Free Auto Safety Hotline at 1-800-424-9393. (Washington, D.C. area residents may call 800-8723).

We believe, and NHTSA agrees, that the single most important safety action you can take is to ensure that all occupants are wearing seat belts properly at all times. And, of course, never allow anyone to occupy the cargo area. Also, please ensure that any removable seat has been securely fastened before the vehicle is driven.

Chrysler Corporation is proud of its safety leadership position and stands firmly behind the quality and safety of its minivans. We're sorry for any inconvenience, but we believe this action will help ensure your continued satisfaction. Thanks for your attention to this matter.

**Customer Service Field Operations
Chrysler Corporation
840-1**

EXTREMELY IMPORTANT INFORMATION

Dear Minivan Owner:

We previously notified you that a stronger liftgate latch is available for your minivan. Our records indicate that the liftgate latch has not been replaced on your minivan.

We strongly urge you to make an appointment at your Chrysler/Plymouth or Dodge dealership to have this service performed. Ask the dealer to hold parts for your vehicle, or to order them before your appointment.

Chrysler Corporation is dedicated to the completion of this service action and requests your immediate attention.

The Issue Is . . .

The liftgate latch on your minivan may be forced open in certain crash situations. The new latch is stronger than the current latch in your minivan, and will reduce the chance of the liftgate opening in these situations. It is essential that you have the stronger latch installed in your vehicle in order to lessen the possibility of an unbelted passenger being ejected in the event of a crash.

What Chrysler and your dealer will do . . .

Chrysler will replace the liftgate latch assembly on your minivan with a stronger latch. This service will be provided free of charge (parts and labor). The work will take about one hour to complete. However, additional time may be necessary depending on how dealer appointments are scheduled and processed. Please bring the enclosed Owner Notification Form with you to your dealer. It explains the required service to your dealer.

If you need help . . .

If you have any trouble getting your vehicle repaired, please call us, toll free, at 1-800-Minivan (646-4826) and ask for ext. 777. A representative will assist you in getting your latch replaced.

We are sorry for any inconvenience. Thank you for your immediate attention to this very important issue.

Customer Services Field Operations
Chrysler Corporation
640-4F

SAMPLE LETTERS

THIS INVITATION MAY BE USED TO ENCOURAGE CUSTOMERS TO TAKE PART IN A DEALER-SPONSORED MINIVAN LATCH REPLACEMENT "EVENT DAY."

Dear Customer:

You recently received a letter from Chrysler Corporation informing you that we are now prepared to replace, free of charge, the liftgate latch on your 19XX BRAND Minivan with a stronger latch. This service action is intended to provide you with peace of mind concerning the safety of your minivan.

At DEALERSHIP NAME, we want to assure you that this service action will be performed in a timely and convenient fashion. But we don't want to stop there. As a BRAND minivan owner, you are among our most loyal and valued customers. That's why we want to make this service action as positive an experience for you as possible.

Instead of just coming by to drop off your minivan or read magazines in our waiting room, we want to offer you an invitation to a special one-day event that features quick-turnaround latch replacement service and plenty of fun things to do and see while you're waiting.

(ADJUST AS NECESSARY) We've scheduled this event for DAY/DATE, from START TIME/END TIME. We will have an open-pit barbecue with all the fixin's, as well as hot dogs, sodas and a play area for the kids, plus live entertainment and music featuring (NAME OR TYPE OF ACT/GROUP/ENTERTAINER).

So, give us a call at PHONE # to schedule a latch replacement appointment and take advantage of this special event. I hope to see you there!

DEALER SIGNATURE

(RSVP INFO)

SAMPLE LETTERS

THIS LETTER MAY BE USED TO COORDINATE A MINIVAN OWNER'S REGULAR MAINTENANCE SCHEDULE WITH THE LATCH REPLACEMENT SERVICE. USE YOUR EXISTING TIMED SERVICE REMINDER MAILING LIST TO IDENTIFY CUSTOMERS WITH CURRENT-PHASE MINIVANS.

Dear Customer:

You recently received a letter from Chrysler Corporation informing you that we are now prepared to replace, free of charge, the liftgate latch on your 19XX BRAND minivan with a stronger latch.

In addition, our records show that your minivan is approaching its XX,XXX-mile/X-year recommended maintenance interval. For your convenience, we encourage you to contact our service department to schedule an appointment so that both the latch replacement service and recommended maintenance can be performed in one visit. Please give us a call at PHONE # to schedule an appointment at your earliest convenience.

If you have any questions regarding the latch replacement service, please call our Customer Satisfaction Coordinator at PHONE #.

We look forward to seeing you.

DEALER SIGNATURE

SAMPLE LETTERS

THESE SAMPLE LETTERS AND INVITATION MAY BE ADAPTED TO FIT THE ELEMENTS OF YOUR DEALERSHIP'S PLAN:

CUSTOMER NOTIFICATION FOLLOW-UP

This letter may be used to follow up on Chrysler owner notification contacts. Use the owner information included on the Vehicle List for each phase to remind customers that they may schedule an appointment.

Dear Customer:

You recently received a letter from Chrysler Corporation informing you that we are now prepared to replace, free of charge, the liftgate latch on your 19XX BRAND minivan with a stronger latch.

I encourage you to contact our service department at PHONE # to schedule an appointment for this free-of-charge service at your earliest convenience.

If you have any questions regarding the completion of this service action, please call our Customer Satisfaction Coordinator at PHONE #.

We look forward to seeing you,

DEALER SIGNATURE

1995 MINIVAN OWNER LETTER (SAMPLE)

May 2, 1995

Dear Minivan Owner:

On March 31, I wrote to you regarding a minivan liftgate latch service action Chrysler will initiate shortly. In the course of developing the service action for the 1984 - 1994 models, Chrysler identified an enhancement that could also benefit 1995 models.

Specifically, we will modify the remote release solenoid component of the latch for 1984 - 1994 minivans. We also will make this same change to the latch of your 1995 minivan, at no charge to you, to ensure your confidence and peace of mind.

In the near future, new components will be available for your 1995 minivan. We will notify you when they are available at your dealership. All you will need to do when you receive the notice is telephone your dealer to schedule an appointment. Your dealer will schedule you for the earliest possible appointment. For more information, please call us toll-free at 1-800-MINIVAN (846-4828).

NHTSA has been conducting an investigation of the latches on these vehicles. If you have any concerns regarding this service action, you may call the NHTSA Toll Free Safety Hotline at 1-800-424-9393.

Chrysler Corporation continues to build upon its history of safety leadership. Your safety, your confidence, and your peace of mind are all important to us.

Sincerely,



Thomas E. Chazyjagham
Executive Vice President - Sales and Marketing
General Manager - Minivan Operations

**1995 MINIVAN OWNER LETTER
(SAMPLE)**

Dear Minivan Owner:

There has been recent and highly visible media coverage questioning the safety of liftgate latches on 1984 - 1994 Chrysler, Plymouth, and Dodge minivans. This coverage is emotional in nature, and may have raised concern among some of the four million owners of these minivans. We are writing to advise that, as the owner of a 1995 model, you need not be concerned. The questions raised apply only to 1984 - 1994 Chrysler, Plymouth, and Dodge minivans.

Chrysler Corporation firmly stands behind the quality and safety of our minivans, including the liftgate latches. There has been no formal determination that a safety defect exists with minivan latches. However, to help assure peace of mind, Chrysler has decided to provide a stronger latch on 1984 - 1994 Chrysler, Plymouth, and Dodge minivans at no charge.

Again, because you own a 1995 model, you need not be concerned about your vehicle's liftgate latch. In fact, a latch similar to the one on your 1995 minivan, will be offered to owners of previous models.

We believe, and the National Highway Traffic Safety Administration (NHTSA) agrees, the single most important safety action anyone can take is to make certain that all occupants are wearing seat belts properly at all times. And, of course, never allow anyone to occupy the cargo area. Also, please ensure that any removable seat has been securely reattached before the vehicle is driven.

Chrysler Corporation has a history of safety leadership. We take it very seriously. We at Chrysler Corporation want you to be safe—and certain.

Sincerely,

SERVICE NOTIFICATION

INSTRUCTIONS TO CHRYSLER CORPORATION VEHICLE OWNER

Please present this notification card to your dealer to have the service described in the enclosed letter performed. This service will be provided free of charge for the car or truck whose Vehicle Identification Number is printed at the right. Please call the servicing dealer for an appointment before your visit for quicker service and convenience.

When the service is completed, ask the dealer to enter the dealer name, dealer code and repair date on the card at the right, and then to give you the card for your record of repair.

If you know that this service has already been performed or if the vehicle is not in your possession — please complete the right side of this form. Detach it from this stub and mail the form. No postage is needed.

Thank you for your cooperation.

Chrysler Corporation

Description: **LIFTGATE LATCH PN CFVTE404**

Parts Return Requirement (Yes, No): **NO**

When the service is completed, enter the dealer name, code and date on the card at right and provide it to the owner as a record of repair.

For reimbursement, the claim must be submitted through the dealer's normal claim submission channel, (D.I.A.L. or paper).

YOU KNOW THAT THE SERVICE HAS BEEN COMPLETED
VEHICLE IS NOT IN YOUR POSSESSION

- Please check the appropriate box and provide the information requested:
 - This service was previously performed (check one): Inadequate
 - This vehicle was (check one): scrapped stolen exported
 - This vehicle was sold. Please fill in the following information sold to a retail buyer — not to a dealer:
 - Date of Sale: Mo. Day Yr. (Example: 0 7 8 1)
 - New Owner's Title (check one): 1. Mr. 2. Mrs. 3. Miss 4. Ms. 5. Dr. 6. Business 7. Ms. 8. M.
 - New Owner's Name & Address (Please Type or Print)

New Owner's Name & Address (Please Type or Print)	

VEHICLE IDENTIFICATION NUMBER 8 0 0 0 FLEET NO. N
2B4FK21G7ER
 National Traffic Safety
 400 7th St. SW, Suite 1100
 Washington, DC 20590-0000


DEALER NAME _____
 DEALER CODE _____ REPAIR DATE _____

NO POSTAGE
 NECESSARY
 IF MAILED
 IN THE
 UNITED STATES



BUSINESS REPLY MAIL
 FIRST-CLASS MAIL PERMIT NO. 8941 DETROIT, MI
 POSTAGE WILL BE PAID BY THE ADDRESSEE

CIMS 482-00-85
CHRYSLER CORPORATION
900 CHRYSLER DR
AUBURN HILLS MI 48326-9981





March 1996

Dear Minivan Customer:

As we notified you previously, Chrysler has initiated an extensive service action to replace the latches of the liftgates on all 1984 to 1995 Chrysler, Plymouth and Dodge minivans at no charge to you. This service action will provide you peace of mind concerning the safety of your minivan.

In September 1995, we began to notify our owners to return to their dealership for this service. The timing for this notice is dependent on the model year and features of their minivans and the availability of replacement latches. Due to the sheer volume and different types of latches used in our minivans over a ten-year period, we presently anticipate that our latch replacement program will proceed over many months.

The enclosed "Notice of Pendency of Class Action, Proposed Settlement and Supplemental Hearing" is being sent to advise you of a proposed class action settlement that provides for liftgate latch replacement and the settlement of certain claims.

If you have any questions regarding the completion of this service action, please call us at 1-800-MINIVAN (646-4826). If you have any questions regarding the class action litigation, please follow the directions described in Section III of the notice.

We apologize again for any confusion or inconvenience. It is always the position of Chrysler Corporation that the customer comes first, and we hope that you will not be inconvenienced as a result of this matter.

Sincerely,

Customer Service Field Operations
Chrysler Corporation

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

STUART HANLON, et al.,
Plaintiffs,

Case No. C-95-2010-CAL

v.

**NOTICE OF PENDENCY OF CLASS
ACTION, PROPOSED SETTLEMENT,
AND SUPPLEMENTAL HEARING**

CHRYSLER CORPORATION, a Delaware
corporation,
Defendant.

The Hon. Charles A. Legge

**THIS NOTICE MAY AFFECT YOUR RIGHTS
PLEASE READ IT CAREFULLY**

TO: ALL REGISTERED OWNERS, AS OF JULY 21, 1995, OF A CHRYSLER TOWN & COUNTRY, DODGE CARAVAN, OR PLYMOUTH VOYAGER MINIVAN FOR ANY OF THE MODEL YEARS 1984 THROUGH 1995, EXCLUDING DODGE "CV" VEHICLES ("CHRYSLER MINIVANS" OR "MINIVANS"), WHOSE MINIVAN WAS EITHER: REGISTERED IN CALIFORNIA OR PUERTO RICO, OR REGISTERED TO A BUSINESS OR ENTITY RESIDING IN THE UNITED STATES AND PUERTO RICO. EXCLUDED FROM THIS GROUP ARE ALL PRIOR OR SUBSEQUENT OWNERS OF THE MINIVANS AND ANY REGISTERED MINIVAN OWNER WHO HOLDS A MINIVAN FOR SALVAGE, SCRAP, OR FOR SALE OF PARTS.

If you were a registered owner of a Chrysler Minivan as of July 21, 1995, and continue to own your Minivan, you are a member of a Settlement Class and are covered by a proposed settlement of a class action lawsuit.

This Notice describes the lawsuit and the proposed settlement and states the date, time, and place of a supplemental hearing to be held by this Court as to Settlement Class members receiving this Notice. All Settlement Class members who do not exclude themselves from the settlement on time (as described below in Section IV.3) will be entitled to the settlement benefits and will be bound by the orders issued by the Court regarding the settlement.

BACKGROUND

A class action lawsuit captioned as *Stuart Hanlon, et al. v. Chrysler Corporation*, Case No. C-95-2010-CAL (the "Hanlon lawsuit"), has been filed in the United States District Court for the Northern District of California and may affect your legal interests. A class action is a lawsuit in which one or more persons sue on behalf of all other persons in a similar situation. The complaint in the Hanlon lawsuit alleges that the rear liftgate latches in 1984 through 1995 Chrysler Minivans are defective, asserts various claims against Chrysler Corporation ("Chrysler"), and requests that the Court order Chrysler to take action to remedy the alleged defect. Chrysler has denied the existence of a defect in the Minivans and any wrongdoing or liability on its part whatsoever. Chrysler also denies the existence of any class, except for purposes of this settlement, and has raised a number of defenses.

No trial has been held on the merits of any of the allegations against Chrysler or the defenses. This Notice does not imply that there has been any finding of any violation of the law by Chrysler or that recovery could be had in any amount.

This Notice is directed to you because your rights may be affected by the proposed settlement. Although the Court has authorized Notice to be given of the proposed settlement, this Notice does not express the opinion of the Court on the merits of the claims or defenses asserted by either side in the Hanlon lawsuit. Further, this Notice and the proposed settlement do not mean or imply that there is any defect in the Chrysler Minivan rear liftgate latches or that Chrysler has violated any law.

A lawsuit can proceed as a class action only if the Court decides that the plaintiffs and their attorneys can represent the entire class of similarly situated persons. Pursuant to Rule 23 of the Federal Rules of Civil Procedure and the Orders of the Court dated August 18, 1995 and February 23, 1996, the Court has authorized this Notice to be sent to members of the Settlement Class who have been identified from the records of R. L. Polk and Company. The Settlement Class preliminarily approved in the Court's August 18, 1995 Order consists of:

ALL PERSONS AND ENTITIES RESIDING IN THE UNITED STATES AND PUERTO RICO WHO WERE REGISTERED OWNERS, AS OF JULY 21, 1995, OF A CHRYSLER TOWN & COUNTRY, DODGE CARAVAN, OR PLYMOUTH VOYAGER MINIVAN FOR ANY OF THE MODEL YEARS 1984 THROUGH 1995 ("CHRYSLER MINIVANS" OR "MINIVANS"), EXCLUDING DODGE "CV" VEHICLES (THE "SETTLEMENT CLASS" OR "CLASS"). EXCLUDED FROM THE CLASS ARE: ALL PRIOR OR SUBSEQUENT OWNERS OF THE MINIVANS AND ANY REGISTERED MINIVAN OWNER WHO HOLDS A MINIVAN FOR SALVAGE, SCRAP, OR FOR SALE OF PARTS.

The Court has not certified this Class for any purpose other than settlement, and has made no determination that any class would be certified if the Hanlon lawsuit is not settled as proposed.

In accordance with the Court's August 18, 1995 Order, the Court directed that Notice of the proposed settlement be sent to all members of the Settlement Class (including all owners of Minivans registered in the State of California and Puerto Rico and all business entities residing

In the United States and Puerto Rico) who were registered owners of a Chrysler Minivan as of July 21, 1995. Notice was sent in September, 1995. The September, 1995 Notice, like this one, outlined the options available to all Settlement Class members and set forth deadlines for taking certain actions. Specifically, Settlement Class members were given until October 20, 1995 to object in writing to the proposed settlement or exclude themselves from the Settlement Class. The September, 1995 Notice also informed the Settlement Class members that the Court would hold a Fairness Hearing on November 3, 1995 to determine whether the proposed settlement is fair, reasonable and adequate and to hear any objections to Class Counsel's application for attorneys' fees and expenses.

On November 3, 1995, the Court held a Fairness Hearing and heard from counsel for the parties in support of the proposed settlement and from counsel for certain objectors in opposition to the proposed settlement. The Court also heard argument regarding the fee application submitted by Class Counsel. The Court held a further hearing on November 30, 1995 and at the end of the hearing announced its opinion approving the proposed settlement and awarding Class Counsel \$5.0 million in attorneys' fees and up to \$200,000 in costs. Orders and Final Judgments giving final approval to the proposed settlement and awarding Class Counsel fees and expenses were entered on December 1, 1995.

After the Court entered its December 1, 1995 Orders, it was discovered that the September, 1995 Notice was inadvertently not sent to all owners of Minivans registered in California and Puerto Rico or to businesses or entities residing in the United States and Puerto Rico who were registered owners of a Chrysler Minivan as of July 21, 1995 (collectively, "Omitted Owner Group"). As a Settlement Class member, you are entitled to receive Notice and have an opportunity to object to the proposed settlement or exclude yourself from the Settlement Class before you will be bound by an Order of this Court approving the proposed settlement. This Notice is being sent to you to advise you of your rights and options with respect to the proposed settlement.

II. THE PROPOSED SETTLEMENT

In the Hendon lawsuit, Plaintiff's attorneys and Chrysler have agreed to a proposed settlement which provides:

1. Every Settlement Class member who retains ownership of his or her Minivan after this Notice is issued will be entitled to replacement of the Minivan's rear liftgate latch under Chrysler's previously announced Service Action. Specifically, on March 27, 1995, and April 27, 1995, Chrysler announced that it would replace the rear liftgate latches on all 1984 through 1995 Minivans at no cost to Minivan owners. In response to Chrysler's Service Action, the National Highway Traffic and Safety Administration stated that Chrysler's action will alleviate the concerns that have been raised regarding the performance of the latches in crashes. The proposed settlement contractually obligates Chrysler to replace the rear liftgate latches pursuant to its Service Action.
2. To encourage and facilitate replacement of the rear liftgate latches by as many Settlement Class members as practicable, Chrysler will devote its best efforts to attain a response rate to the Service Action exceeding, by one Minivan, sixty percent (60.000%) of the Minivans registered as of December 31, 1996 ("Response Rate").
3. Chrysler will make expenditures on efforts to promote the Service Action, in an amount necessary to reach the Response Rate, up to a maximum of fourteen million dollars (\$14,000,000) ("Customer Awareness and Satisfaction Efforts"). Chrysler's Customer Awareness and Satisfaction Efforts will be in addition to the expenditures Chrysler makes for the materials and labor required to replace the rear liftgate latches of the Minivans.
4. Chrysler must also provide certain information to certain attorneys representing the Settlement Class ("Settlement Class Counsel") including: copies of any correspondence proposed for mailing in the Service Action to class members; plans and specifications of the replacement rear liftgate latches; and reports on the response to the Service Action.
5. Chrysler has agreed to pay the reasonable costs of administering the settlement, such as mailing and printing expenses.
6. Plaintiffs and their counsel have agreed to dismiss their action against Chrysler with prejudice.

Please note that, as mentioned in Section VI, the proposed settlement will not release Class members' claims for personal injury or wrongful death allegedly resulting from the rear liftgate latch of a Chrysler Minivan.

III. CLASS COUNSEL AND ATTORNEYS' FEES AND EXPENSES

For purposes of the proposed settlement, Settlement Class Counsel are the Barrett Law Offices and Lief, Cabraser, Heimann & Bernstein.

Please direct any questions concerning this Notice or the proposed settlement to Settlement Class Counsel as follows:

Minivan Rear Liftgate Latch
Settlement Class Counsel
c/o Michael F. Ram
LIEFF, CABRASER, HEIMANN & BERNSTEIN
275 Battery Street, 30th Floor
San Francisco, CA 94111-3339
Telephone: (800) 956-1135
Facsimile: (415) 956-8964

The attorney representing Chrysler in this litigation is:

Charles A. Newman, Esq.
THOMPSON & MITCHELL
One Mercantile Center, Suite 3400
St. Louis, MO 63101-1893
Facsimile: (314) 342-1717

Class Counsel (which include all lawyers representing plaintiffs in the Harlon lawsuit and certain related class actions in state courts around the United States) believe that the proposed settlement is fair, reasonable, and adequate. Class Counsel, on behalf of Plaintiffs and the Settlement Class, entered into the settlement after weighing the substantial benefits of the settlement against the probabilities of success or failure and the long delays that would be likely if the case proceeded to trial.

The proposed settlement does not provide for, and is not conditioned on, the payment of any specific attorneys' fees to Class Counsel. In the proposed settlement, Chrysler obligated itself to pay reasonable attorneys' fees and reasonable outlays or expenses incurred by Class Counsel.

On July 21, 1995, Class Counsel and Chrysler participated in a mediation process with a neutral, qualified third-party acting as mediator. As a result, the mediator recommended that Class Counsel (which include all lawyers representing plaintiffs in the Harlon lawsuit and certain related class actions in state courts around the United States) be awarded and that Chrysler pay a total of \$5,000,000 in attorneys' fees and up to \$200,000 in outlays and expenses. Chrysler and Class Counsel entered into an Addendum to the Settlement Agreement reflecting the results of the mediation.

If the Court approves the proposed settlement, the Court will decide the amount of attorneys' fees and expenses awarded to Class Counsel. Any award of attorneys' fees and expenses is to be paid solely by Chrysler and will not reduce, directly or indirectly, any of the benefits the Class members receive under the proposed settlement.

IV.

OPTIONS OF SETTLEMENT CLASS MEMBERS

IF YOU ARE A SETTLEMENT CLASS MEMBER, YOU HAVE THE FOLLOWING OPTIONS:

1. To remain a Settlement Class member, YOU DO NOT NEED TO DO ANYTHING. If you take no action, your interests as a member of the Settlement Class will be represented by Plaintiffs and Class Counsel without charge to you. You will not be charged for their services. You are not required to hire your own attorney. You will be bound by any judgment approving or disapproving the settlement, and you will receive the benefits of the proposed settlement if it is approved by the Court.

2. You can remain a Settlement Class member and hire your own attorney to represent you at your own cost. If you want your own attorney to represent you in this lawsuit, your attorney must file a Notice of Appearance with the Clerk of the Court, United States District Court for the Northern District of California, 450 Golden Gate Avenue, San Francisco, California 94102, and send a copy to Class Counsel and counsel for Chrysler at the addresses listed in Section III above. The Notice of Appearance must be filed by April 15, 1996.

3. You can request exclusion from the Settlement Class. If you choose to be excluded from the Settlement Class, you will not be bound by any judgment or other final disposition of this lawsuit. You will retain any claims against Chrysler you might have. To request exclusion, you must state in writing your desire to be excluded from the Settlement Class. You must sign your request for exclusion personally. (If your Minivan is owned by a trust, corporation or other entity, the exclusion must be signed by an authorized representative of the trust, corporation, or other entity.) Your request must include your full name, current address, the VIN (Vehicle Identification Number), and the model year and type of your vehicle (i.e., Chrysler Town & Country, Dodge Caravan, or Plymouth Voyager). With your request for exclusion, you must also include proof of ownership of your Minivan(s) (such as a copy of your title, registration, license receipt, or purchase receipt). (DO NOT SEND ORIGINAL DOCUMENTS.) The request for exclusion must be sent by first class mail, mailed and postmarked on or before April 15, 1996, addressed to:

Minivan Rear Liftgate Latch Class Settlement
c/o Michael F. Ram
LIEFF, CABRASER, HEIMANN & BERNSTEIN
P.O. Box 2820
San Francisco, CA 94126-2820

If the request is not postmarked on or before April 15, 1996, your request for exclusion will be invalid, and you will be included in the Settlement Class automatically, bound by the final judgment and barred from bringing any claims for economic damages against Chrysler. You must specifically state that you request exclusion from the Settlement Class in Stuart Harlon, et al. v. Chrysler Corporation, Case No. C-95-2010-CAL.

4. You can object to the proposed settlement. If you do not request exclusion from the Settlement Class, you can object to the proposed settlement by filing and serving a written objection. You must sign your objection personally. (If the Minivan in question is owned by a trust, corporation, or other entity, the objection must be signed by an authorized representative of the trust, corporation, or other entity.) Your objection must state your full name and current address. You must also state the model year, type (i.e., Chrysler Town & Country, Dodge Caravan, or Plymouth Voyager), and vehicle identification number of the Minivan(s) you own. You must include with your objection proof of ownership of your Minivan(s) (such as a copy of your title, registration, license receipt, or purchase receipt). (DO NOT SEND ORIGINAL DOCUMENTS.) Your objection must state why you object to the proposed settlement and any reasons supporting your position. If you intend to appear personally at the April 29, 1996 hearing described below in Section V, you must include with your objection a notice of your intention to appear at the hearing.

You must mail any objection, along with any notice of intent to appear, postmarked on or before April 15, 1996. These documents should be filed with the Clerk of the Court by mailing them to the following address:

Clerk of the Court
United States District Court
450 Golden Gate Avenue
San Francisco, CA 94102
File: Stuart Hanlon, et al. v. Chrysler Corporation, Case No. C-95-2010-CAL

You must also mail a copy of your objection, along with your notice of Intent to appear, postmarked on or before April 15, 1996 to Class Counsel and counsel for Chrysler.

The address for Class Counsel is:

Minivan Rear Liftgate Latch Class Settlement
c/o Michael F. Rem
LIEFF, CABRAGER, HEIMANN & BERNSTEIN
P.O. Box 2820
San Francisco, CA 94126-2820

The address for counsel representing Chrysler in this litigation is:

Charles A. Newman, Esq.
THOMPSON & MITCHELL
One Mercantile Center, Suite 3400
St. Louis, MO 63101-1683

Any Settlement Class member who does not file and serve objections in the time and manner described above will not be permitted to raise those objections later.

V. SUPPLEMENTAL FAIRNESS HEARING

On April 29, 1996, at 2:00 P.M., this Court will hold a Supplemental Hearing in the courtroom of U.S. District Judge Charles A. Legge, 450 Golden Gate Avenue, San Francisco, California 94102, to hear any member of the Omitted Owner Group who filed a timely written objection to the proposed settlement. The Court will also hear any objections to Class Counsel's application for an award of attorneys' fees and reimbursement of costs and expenses, to be paid by Chrysler in the amount awarded by the Court. The hearing may be postponed to a later time without further notice.

If you desire to present any evidence to be considered by the Court at the supplemental hearing, it must be in documentary form. Any testimony shall be offered in the form of an affidavit or declaration together with any other documents. Any and all evidence shall be filed with the Clerk and mailed to Class Counsel and Counsel for Chrysler as directed in Section IV of this notice. An objector need not submit documentary evidence in order to appear at the Supplemental Fairness Hearing.

You will be represented at the hearing on the fairness of the settlement by Class Counsel, unless you enter an appearance in person or through your own counsel. The appearance of your own attorney is not necessary to permit participation in the settlement. As a member of the Settlement Class, you will not be personally responsible for attorneys' fees or cost disbursements except those of your own counsel.

VI. TERMINATION OF CLAIMS

If the proposed settlement is approved as to you, it will be binding and will release Chrysler from any and all claims, including any claims for consumer damages or equitable relief, arising out of or related to the Minivan rear liftgate latches, that were or could have been asserted by Settlement Class members in the Hanlon lawsuit. In addition, if the proposed settlement is approved as to you, it will release any and all claims, arising out of or related to the Minivan rear liftgate latches, that were or could have been asserted for Settlement Class members in certain class action lawsuits pending in various state courts around the United States. The proposed settlement does not, however, release, dismiss, or affect any claims for personal injury or wrongful death as an alleged result of the rear-door latch on the Minivans.

VII. FOR MORE INFORMATION

This Notice is only a summary. The full settlement agreement, the complaint, answer and other filed documents and Orders in the Hanlon lawsuit can be requested, in writing, from Settlement Class Counsel identified in Section III above, or can be inspected and copied, during normal business hours, at the office of the Clerk of the Court.

Clerk of the Court
United States District Court
450 Golden Gate Avenue
San Francisco, CA 94102
File: Stuart Hanlon, et al. v. Chrysler Corporation, Case No. C-95-2010-CAL

ALL QUESTIONS ABOUT THIS NOTICE, THE CLASS ACTION, OR THE PROPOSED SETTLEMENT SHOULD BE DIRECTED TO CLASS COUNSEL IDENTIFIED IN SECTION III ABOVE. PLEASE DO NOT CALL OR WRITE THE COURT OR THE CLERK'S OFFICE FOR INFORMATION.