STATE OF MICHIGAN

IN THE CIRCUIT COURT FOR THE COUNTY OF OAKLAND

CHRYSLER CORPORATION, a Delaware corporation,

Plaintiff,

C.A.#94-48917-CZ HON. EDWARD SOSNICK

vs.

PAUL SHERIDAN,

Defendant.

Charles F. Clippert (Pl1938) Attorney for Plaintiff 525 North Woodward Avenue Bloomfield Hills, MI 48303-0509 (810) 646-4300 Joseph C. Marshall, III (P28079)
Robert B. Brown (P51378)
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Attorney for Plaintiff
1490 First National Building
Detroit, Michigan 48226
(313) 961-0130

AFFIDAVIT OF COURTNEY E. MORGAN, JR.

STATE OF MICHIGAN)
)ss.
COUNTY OF WAYNE)

COURTNEY E. MORGAN, JR., being first duly sworn, deposes and states as follows:

- 1. My name is Courtney E. Morgan, Jr. I am an attorney licensed to practice in the State of Michigan and have been since 1978. I am over the age of 21 years.
- 2. I am the current attorney for Paul Sheridan in the case of Chrysler Corporation vs. Paul Sheridan.
- 3. On February 7, 1995, in the course of investigating allegations made against Mr. Sheridan in this case, I attempted to

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contact Joseph Bohn at the Automotive News.

- did have an opportunity to speak with Mr. Bohn during the afternoon hours of February 7, 1995. During my conversation with Mr. Bohn, I identified myself as the attorney for Paul Sheridan. I indicated to him that an article written by Mr. Bohn had been referred to in Chrysler's Verified Complaint against Mr. Sheridan. I further indicated to him that the Verified Complaint alleged that Mr. Sheridan had given certain crash test results documents to a third party, whom I believed to be Seymour Kliger, and that the Verified Complaint further alleged that Mr. Kliger had given the crash test results documents to Mr. Bohn.
- were untrue. Mr. Bohn stated in no uncertain terms that such allegations were untrue. Mr. Bohn further stated that he would not discuss with me anything else about his article or his research for it citing confidentiality of sources under the First Amendment. I asked Mr. Bohn if he would sign an Affidavit attesting to the fact that these allegations made by Chrysler were and are untrue. He stated that he would. I stated to Mr. Bohn that I would transmit to him a copy of the Verified Complaint, together with the supporting Affidavits attached thereto, a copy of Mr. Sheridan's Answer and an Affidavit for him to sign. Mr. Bohn gave me his home address to send these items to. I indicated to him that because of the time element involved, I may even bring the documents to his address myself.
- 6. I, in fact, did go to Mr. Bohn's home on February 7 1995, at approximately 7:00 p.m. When I arrived there and identified myself,

Mr. Bohn indicated that while he was sorry and he really wanted to help, upon the advice of counsel, he could not sign the Affidavit as it might be construed or argued to be a waiver of his privileges under the law. I asked if he had been contacted by Chrysler regarding Mr. Sheridan or this case. He stated no, he had not. I indicated that based upon all of the statements made to me by him that a subpoena for his testimony would be necessary. He indicated he would resist the subpoena. I then left his home.

I have had no contact with Mr. Bohn since that time other than to secure the name and telephone number of his lawyer.

| FURTHER, | DEPONENT | SAITH | NOT. | 20 |
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Subscribed and sworn to before me 1995

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