

In The Matter Of:
Walden vs. Chrysler

Sergio Marchionne

January 09, 2015

Tiffany Alley Global Reporting & Video

730 Peachtree Street NE

Suite 470

Atlanta, GA 30308

770.343.9696

www.tiffanyalley.com



IN THE SUPERIOR COURT OF DECATUR COUNTY.
STATE OF GEORGIA

JAMES BRYAN WALDEN and
LINDSAY WALDEN,
Individually and on
behalf of the Estate of
their deceased Son,
REMINGTON COLE WALDEN,

Civil Action File
No. 12CV472

Plaintiffs,

vs.

CHRYSLER GROUP, L.L.C.,
and BRYAN L. HARRELL,

Defendants.

THE DEPOSITION OF SERGIO MARCHIONNE

January 9, 2015

9:20 a.m.

The Peachtree, Suite 300

1355 Peachtree Street NE

Atlanta, Georgia

Maureen S. Kreimer, RPR, CRR, CCR-B-1379, LCR-061

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Page 6 1 APPEARANCES OF COUNSEL: 2 On behalf of the Plaintiffs: 3 JAMES E. BUTLER JR, ESQUIRE 4 DAVID ROHWEDDER, ESQUIRE 5 Butler Wooten Cheeley & Peak LLP 6 2719 Buford Highway 7 Atlanta, Georgia 30324 8 -and- 9 JAMES EDWARD BUTLER III, ESQUIRE 10 Butler Tobin LLC 11 1932 N. Druid Hills Road NE 12 Suite 250 13 Atlanta, Georgia 30319 14 15 On behalf of the Defendant Chrysler Group, LLC: 16 M. DIANE OWENS, ESQUIRE 17 TERRY O. BRANTLEY, ESQUIRE 18 Swift Currie McGhee & Hiers LLP 19 The Peachtree, Suite 300 20 1355 Peachtree Street NE 21 Atlanta, Georgia 30309 22 23 24 (Defendant Appearances Continued next 25 page)	Page 8 1 (Pursuant to Article 10(B) of the Rules 2 and Regulations of the Georgia Board of Court 3 Reporting, a written disclosure statement was 4 submitted by the court reporter to all counsel 5 present at the proceeding.) 6 (Plaintiffs' Exhibit #A marked) 7 MR. BUTLER: This will be the videotaped 8 deposition of Mr. Marchionne taken pursuant to 9 notice for all lawful purposes, taken on 10 cross-examination. 11 What's the time, Maureen? 12 THE COURT REPORTER: I have got 9:19. 13 MR. BUTLER: Okay. 14 THE COURT REPORTER: Just now hit 9:20. 15 MR. BUTLER: Okay. Okay, ready to go? 16 MS. OWENS: Yes, sir. 17 MR. BUTLER: Okay. 18 THE VIDEOGRAPHER: You ready, sir? 19 MR. BUTLER: Yeah. 20 THE VIDEOGRAPHER: Yeah, stand by, please. 21 MR. BUTLER: We'll announce. 22 THE VIDEOGRAPHER: Okay. And we are on 23 the record. The time is approximately 9:20 a.m. 24 This is the beginning of the videotaped deposition 25 of Sergio Marchionne. Would Counsel present please
Page 7 1 -and- 2 BRIAN S. WESTENBERG, ESQUIRE 3 Miller Canfield 4 840 West Long Lake Road 5 Suite 200 6 Troy, Michigan 48098-6358 7 -and- 8 MARJORIE H. LOEB, ESQUIRE 9 LOUANN VAN DER WIELE, ESQUIRE 10 Chrysler Group, LLC 11 1000 Chrysler Drive 12 Auburn Hills, Michigan 48326-2766 13 14 On behalf of Bryan Harrell: 15 ROBERT BETTS, ESQUIRE 16 Karsten Bicknese 17 Seacrest, Karesh, Tate & Bicknese LLP 18 56 Perimeter Center East, Suite 450 19 Atlanta, Georgia 30346 20 21 Also present: Ms. Beth Glen, paralegal Butler 22 Wooten 23 24 25	Page 9 1 identify themselves and who they represent for the 2 record. 3 MR. BUTLER: Jim Butler, Jeb Butler and 4 Dave Rohwedder, and paralegal Beth Glen, here for 5 the Plaintiffs. 6 MR. BETTS: Robert Betts for Defendant 7 Harrell. 8 MS. OWENS: Diane Owens, Brian Westenberg, 9 Terry Brantley, Margie Loeb and Louann Van Der 10 Wiele, on behalf of the Defendant Chrysler Group, 11 LLC. 12 THE VIDEOGRAPHER: Anyone else? Thank 13 you, Counsel. 14 Would the court reporter please swear the 15 witness. 16 SERGIO MARCHIONNE, 17 having been first duly sworn, was examined and 18 testified as follows: 19 EXAMINATION 20 BY MR. BUTLER: 21 Q. State your name for the record, please, 22 sir. 23 A. Sergio Marchionne. 24 Q. Marchionne? 25 A. I will answer to most.

Page 10 1 Q. Pardon? 2 A. I will answer to most readings. 3 Q. What is your job? 4 A. I'm the chief executive of Fiat Chrysler 5 Automobiles, and I'm the -- which is the Dutch 6 company headquartered in Europe which runs, now, 7 runs Chrysler U. S. And I'm also the chief 8 executive of the U. S. Operations. 9 Q. Well, for what corporation do you work? 10 What's the proper name of the corporation? 11 A. Fiat Chrysler Automobiles N.V., 12 headquartered in Holland, listed in New York. 13 Q. I thought it was registered as a 14 Netherlands corporation but headquartered in London? 15 A. It is incorporated under Dutch law. It 16 is -- 17 Q. And headquarter is in London; correct? 18 A. It has a corporate residence in London, 19 and it is listed in New York. 20 Q. Okay. And so that's Fiat Chrysler 21 Automobiles, N period, V period? 22 A. N period, V period. 23 Q. And the U. S. affiliate you mentioned, 24 what's the name of that company? 25 A. It is now called FCA US, LLC.	Page 12 1 A. The only thing I can tell you is that it's 2 the same company. I can't express an opinion on 3 what you suggested. 4 Q. Well, do we need to change the name of the 5 corporate defendant in this case? 6 A. That's a legal matter. I'm not here to 7 express an opinion. I just don't know. 8 Q. You are a lawyer, are you not? 9 A. Yes. But I'm a Canadian lawyer, as you 10 well know, and that has... 11 Q. You're not an engineer, are you? 12 A. I'm not an engineer. 13 Q. You're a lawyer and a chartered 14 accountant; correct? 15 A. Yeah. 16 Q. Where do you live? 17 A. Switzerland. 18 Q. Where in Switzerland? 19 A. A city called Zug. 20 Q. Is that near Geneva? 21 A. No. It's in the German part of 22 Switzerland. 23 Q. Z-U-G? 24 A. Z-U-G. The name of the town is actually 25 Walchwil.
Page 11 1 Q. That's the company that used to be named 2 Chrysler Group, LLC? 3 A. Correct. 4 Q. The name was changed on December 16, 2014? 5 A. Correct. 6 Q. The name change doesn't really change 7 anything, does it? 8 A. It does not. It was done to make sure 9 that the whole global organization reflected the new 10 acronym of FCA. 11 Q. All right. It's the same corporation; 12 correct? 13 A. Identical. 14 Q. So in this lawsuit we don't need to change 15 the name of the corporate defendant from Chrysler 16 Group, LLC, to FCA US, LLC, because it's the same 17 corporation; correct? 18 A. I can't express an opinion on the legal 19 merits of what you said. 20 Q. Well, do you claim that the name change -- 21 name change means that the corporation is no longer 22 responsible if the court and jury find it liable in 23 this case? 24 A. It's the same company. 25 Q. Is that a "yes" or a "no"?	Page 13 1 Q. All right. Are you chairman of FCA US? 2 A. Yes. 3 Q. Fiat took over Chrysler when it bought 4 Chrysler's out of -- Chrysler's assets out of 5 bankruptcy in 2009; correct? 6 A. I'm not sure that's exactly how the 7 transaction happened, but it became a shareholder of 8 Chrysler Group, LLC, in 2009. 9 Q. Fiat did? 10 A. Yeah, Fiat did. 11 Q. Chrysler Group, LLC, was a new corporation 12 created in 2009; correct? 13 A. I think so. I don't know for sure, but I 14 think it was new. 15 Q. And the assets of old Chrysler were 16 transferred into Chrysler Group; correct? 17 MS. OWENS: Object to the form of the 18 question. 19 You may answer. 20 A. Some may have been transferred, yes. 21 BY MR. BUTLER: 22 Q. All right. 23 A. It was part of a corporate reorganization 24 in association with the bankruptcy. 25 Q. As part of that corporate reorganization

Page 14 1 and bankruptcy, the Chrysler entities received a 2 bailout from the United States Treasury; isn't that 3 correct? 4 MS. OWENS: Objection to the form of the 5 question. 6 A. They received a series of funding measures 7 from both the Canadian and the U. S. government and 8 the province of Ontario, in particular, that allowed 9 Chrysler Group, LLC, to function from June 10th, 10 2009. 11 MR. BUTLER: Move to strike as 12 nonresponsive. 13 Let me get my question back. 14 BY MR. BUTLER: 15 Q. As part of the corporate reorganization 16 and bankruptcy, the Chrysler entities received a 17 bailout from the United States Treasury; isn't that 18 correct? 19 MS. OWENS: Same objection. 20 A. I thought I'd answered it. 21 BY MR. BUTLER: 22 Q. Will you answer my question? 23 A. I just answered. 24 Q. I didn't ask you anything about Canada or 25 Ontario, did I?	Page 16 1 the end result was that one-and-a-half billion 2 dollars was not repaid? 3 A. There was funding that was given to -- it 4 was given, going back to December of 2008 and the 5 first quarter of 2009, it was given to a predecessor 6 company, with which I have no affiliation and no 7 knowledge of. 8 Q. Well, the net result of all the U. S. 9 taxpayer funding given to Chrysler is the taxpayers 10 ended up losing one-and-a-half billion dollars; 11 correct? 12 A. I would not know because I was not aware 13 of the funding that went into the old company at the 14 time. 15 The only thing I do know, Mr. Butler, is 16 that I became CEO of the company on June 10th, 2009, 17 and on that date there was funding provided by the 18 United States Treasury, for which we took full 19 responsibility and repaid in 2011. 20 MR. BUTLER: Move to strike the latter 21 part as nonresponsive. 22 BY MR. BUTLER: 23 Q. Isn't it true, sir, that you called this 24 U. S. taxpayer funding of Chrysler a "bailout"? 25 A. I probably have historically, yes. But
Page 15 1 A. But I'm trying to tell you what happened. 2 You can disregard what happened. 3 Q. Well, did Chrysler receive a bailout from 4 the United States Treasury? 5 MS. OWENS: Objection to the form of the 6 question. 7 A. It received funding from the United States 8 Treasury and from other entities that's across the 9 border. 10 BY MR. BUTLER: 11 Q. How much funding did Chrysler receive from 12 the United States Treasury? 13 A. About \$7 billion dollars. 14 Q. 7 billion? 15 A. 7 billion. All of -- 16 Q. I thought I read somewhere that it was 17 more like 12-and-a-half billion? 18 A. No. It was 7 billion. And all of which 19 was repaid in May of 2011 with 19.7 percent interest 20 per annum. 21 MR. BUTLER: Move to strike the latter 22 part as nonresponsive. 23 BY MR. BUTLER: 24 Q. Sir, isn't it true that of the United 25 States' taxpayer money that was given to Chrysler,	Page 17 1 the whole process was called a bailout, including 2 General Motors at the time. 3 Q. When Fiat took over the assets of Chrysler 4 in 2009, it then controlled those assets through the 5 new corporation Chrysler Group, LLC; correct? 6 A. It did not initially until it acquired 7 control in 2011. 8 Q. Sir, didn't Fiat have a 58.5 percent 9 interest of the new corporation Chrysler Group in 10 2009? 11 A. No. 12 Q. When did it obtain complete control over 13 Chrysler? 14 A. January 1st, 2014, was the date in which 15 we announced the acquisition of the remaining 16 interest by Viva in the company, and it was closed 17 within the month of January of last year. 18 Q. And now Fiat owns 100 percent? 19 A. Correct. 20 Q. But you took over -- you and the 21 management team at Fiat took over management of 22 Chrysler in June -- on June 10, 2009; correct? 23 A. I took over as CEO on June 10th, 2009, and 24 the management team came from Chrysler in the United 25 States. There were only two or three expats that

Page 18 1 were brought in at the time. 2 (Plaintiffs' Exhibit #33 marked) 3 BY MR. BUTLER: 4 Q. Show you Plaintiffs' Exhibit No. 33. 5 Is that the Chrysler press release 6 announcing the name change? 7 A. Yes. I think. Yeah. 8 (Plaintiffs' Exhibit #38 marked) 9 BY MR. BUTLER: 10 Q. Show you Plaintiffs' Exhibit No. 38. 11 Have you ever seen that article before 12 from Reuters -- Reuters, Reuters, or however you 13 pronounce that. It's the London press organization. 14 A. I have not seen this particular one, but 15 I'm aware of the publication. 16 Would you like me to read it. 17 Q. I was just going to ask you a couple of 18 questions about it. 19 A. If you'll give me a second, just... 20 Q. Sure. 21 A. I have read it. 22 Q. All right. This indicates that Chrysler, 23 or Chrysler Group, I guess, was going to buy the 24 remaining 41-point -- well, strike that. 25 This indicates that Fiat was going to buy	Page 20 1 A. That is technically not true. 2 Q. Technically not true? 3 A. Well -- 4 Q. Is it practically true? 5 A. It's not practically true either. Fiat 6 did pay for its interest in Chrysler. 7 Q. Do you recall being interviewed by the 8 Globe and Mail -- which is a London newspaper; 9 correct? 10 A. Globe and Mail is a Canadian newspaper. 11 Q. Canadian. Okay. I don't get out much. 12 Do you ever recall being interviewed by 13 the Globe and Mail? Obviously, it's Canadian. It's 14 got the maple leaf. 15 A. I'm not sure. If I could see the article. 16 (Plaintiff's Exhibit #83 marked). 17 BY MR. BUTLER: 18 Q. Plaintiffs' Exhibit No. 83. 19 Do you recall being interviewed by the 20 Globe and Mail for this article entitled, quote, 21 "2009's CEO of the Year"? 22 A. Yes. 23 Q. All right. Do you recall telling the 24 Globe and Mail -- look at Page 4, the last 25 paragraph: "If Chrysler drives off a cliff, once
Page 19 1 the remaining 41-and-a-half percent of the stock of 2 Chrysler Group; correct? 3 A. That's correct. 4 Q. Yes, sir. It also indicates that Fiat and 5 its U. S. unit, Chrysler at the time, had liquidity 6 amounting to \$27.7 billion dollars? 7 A. That's what the report says, yes. 8 Q. Well, is that -- was that accurate? 9 A. Approximately, yes. I don't know whether 10 the exact number is 41, but it has liquidity in 11 excess of 20 billion euros at the time. 12 Q. All right. If you look at the -- this is 13 also the article where you were quoted as saying 14 that the Jeeps with rear gas tanks are, quote, 15 "absolutely safe," close quote. 16 Do you see that? 17 A. Yeah, I did see it. 18 Q. Did you say that? 19 A. I did say it. 20 Q. How many times have you said that? 21 A. I don't know. 22 Q. Many times? 23 A. More than once. 24 Q. All right. The truth is that Fiat got 25 Chrysler basically for nothing; isn't that right?	Page 21 1 again, it won't cost Marchionne anything but a 2 bruised ego for he has vowed not to put a cent into 3 a company that cost him nothing to buy and whose 4 value is registered as a big fat zero on Fiat's 5 books. "This is the best thing we could have done 6 for ourselves and for Chrysler," he says." 7 Do you recall telling them that? 8 A. I remember making the comment in quotation 9 marks. The rest of the stuff is something that the 10 journalist put in, which I did not say. 11 Q. So the journalist got that wrong? 12 A. I don't know -- that's his writing. 13 That's not my statement. 14 Q. Well, I understand. But he -- quote, he 15 says that you have vowed not to put a cent into a 16 company "that cost him nothing to buy"? 17 A. That's not what I said. 18 Q. You didn't say that? 19 A. No, because he says it. 20 Q. I know. I know he wrote it. But you -- 21 he had to get it from somewhere. Did you tell him 22 that? 23 A. There is a lot of things in here that he 24 wrote that are his own writing. 25 Q. I understand. Did you tell him that or

Page 22 1 not? 2 A. No. 3 Q. Okay. 4 A. What I did -- what I did say publicly is 5 that the initial introduction of Fiat into Chrysler, 6 that Fiat was not going to put any funding into the 7 organization in 2009. 8 Q. Well, it's not just this reporter -- this 9 reporter did interview you, did he not? 10 A. Yes, he did. 11 Q. And he asked you questions? 12 A. He did. 13 Q. Okay. But it's not just the reporter's 14 words based on his interview with you. Isn't it 15 true that other analysts have said that Fiat 16 basically -- basically got Chrysler for nothing? 17 MS. OWENS: Objection to the form of the 18 question. 19 BY MR. BUTLER: 20 Q. Is that true? 21 A. Other people may have made that statement. 22 It wasn't me. 23 Q. Look at Page 7. 24 A. I am looking at Page 7. 25 Q. All right. Top of the page it's quoting	Page 24 1 Isn't that what it says Mr. Dudenhöffer 2 said? 3 A. I'm just reading the statement. That's 4 what it says. 5 Q. Well, is all that correct? 6 A. No. 7 Q. Now, with respect to this statement in 8 Plaintiffs' Exhibit No. 38 to Reuters that the Jeeps 9 with rear gas tanks are absolutely safe, how many 10 Americans have been burned in wrecks where your 11 corporation's Jeeps with rear gas tanks were hit in 12 the rear? 13 A. I do not know. 14 Q. Have you asked? 15 A. No. 16 Q. Did you read the June 13, 2013, letter 17 sent to Chrysler Group by the Office of Defects 18 Investigation of NHTSA? 19 A. Yes. 20 Q. Do you recall that in that letter it says 21 that there have been at least 32 fatal rear impact 22 fire crashes involving Grand Cherokees resulting in 23 44 deaths? 24 MS. OWENS: Objection to the form of the 25 question.
Page 23 1 Ferdinand Dudenhöffer, director of Germany's Center 2 for Automotive Research. 3 Do you know him? 4 A. No, he's a bit far removed from the 5 American car business. He's German. 6 Q. He's not far from the Italian car 7 business, is he? 8 A. No. But he's pretty far away from the 9 U. S. side. I don't know him. 10 Q. I have forgotten my geography. Does 11 Germany -- do Germany and Italy, are they adjoining? 12 Do they have a common border? 13 A. Yes. 14 Q. Thank you. I was worried that I'd -- 15 A. I'm trying to find out exactly. I think 16 it does have a section that is bordered. 17 Q. I thought so. 18 MS. OWENS: Geography is not my specialty. 19 MR. BUTLER: Move to strike as 20 inappropriate. 21 BY MR. BUTLER: 22 Q. Isn't Mr. Dudenhöffer quoted in this 23 article, which is about you, as saying, quote, 24 "Marchionne found a company he could buy for 25 nothing. There was no risk. He got it as a gift."	Page 25 1 A. If you could show me the letter. 2 BY MR. BUTLER: 3 Q. Well, do you recall that? That is my 4 first question. I'm going to show you the letter. 5 A. Yeah. 6 Q. But do you recall that is my question 7 right now. 8 A. I don't recall the exact wording of the 9 letter. 10 (Plaintiffs' Exhibit #40 marked) 11 BY MR. BUTLER: 12 Q. All right. Show you Plaintiffs' Exhibit 13 No. 40. 14 Is that, in fact, the ODI's June 3, 2013, 15 letter from -- or to Chrysler Group? 16 A. It looks that way. 17 Q. All right. And if you'll look at Page 5. 18 A. Yeah. 19 Q. Second paragraph. Do you see where it 20 says -- 21 A. Yes. 22 Q. -- "there have been at least 32 fatal rear 23 impact fire crashes involving Grand Cherokees 24 resulting in 44 deaths"? Do you see that? 25 A. Yes, I do.

Page 26 1 Q. All right. When you read that -- when did 2 you read that letter? 3 A. Whenever I received it. 4 Q. When did you receive it? 5 A. It must have been the same day that it was 6 sent. I -- 7 Q. Do you know how -- 8 A. There would have been no delay. 9 Q. Do you know how you received it? 10 A. No, it came through my office, through my 11 assistant. I don't know exactly how. 12 Q. Do you know where you were on June 3, 13 2013? 14 A. No, I don't. 15 Q. Did you talk to anybody about this letter? 16 A. After I received it, yes. 17 Q. Okay. Well, did you ask anybody about any 18 of these 44 deaths in rear impact fire crashes 19 involving Grand Cherokees? 20 A. I asked about what our view was on the 21 accuracy of that statement, yes. 22 Q. Mm-hmm. Who did you ask? 23 A. Our technical staff. In particular a guy 24 by the name of Mark Chernoby, who was the Head of 25 Engineering.	Page 28 1 since March 6, 2012, when Remi Walden died? 2 A. I do not. 3 Q. Have you asked? 4 A. No, I have not. 5 Q. Who at Chrysler Group or at FCA is 6 supposed to keep up with that information? 7 A. We have a group of people who handle 8 regulatory affairs and handle safety matters. 9 Q. Well, if I wanted to call somebody up -- I 10 know I can't call somebody up, but if I could and 11 wanted to call somebody up and ask them that 12 question, since you don't know -- 13 A. Yeah. 14 Q. -- how many Americans have been burned in 15 rear impacts in the Jeeps with rear gas tanks since 16 Remi died, who would I call? 17 A. Mark Chernoby. 18 Q. We count at least 19 since March 6, 2012. 19 Has anybody provided you any information 20 about how many there have been? 21 MS. OWENS: Objection to the form of the 22 question. 23 A. No. 24 (Plaintiffs' Exhibit #41 marked) 25 BY MR. BUTLER:
Page 27 1 Q. How do you spell his last name? 2 A. C-H-E-R-N-O, B as in Bob, Y. 3 Q. Do you deny that as of June 3, 2013, there 4 had been at least 44 deaths in rear impact fire 5 crashes involving Grand Cherokees? 6 A. I have no way of disagreeing with that 7 statement. 8 Q. Okay. Isn't it true that the Office of 9 Defects Investigation found that Americans had died 10 in fatal fires in Jeeps with rear gas tanks in these 11 U. S. states? And you can follow me, it's on 12 Pages 7 and 9. Texas, Indiana, Florida, New York, 13 California, Mississippi, Louisiana, Wyoming, 14 Virginia, South Carolina, New Jersey, Illinois, 15 Arizona, Pennsylvania, Michigan, Puerto Rico, 16 Wisconsin and Georgia. 17 Isn't that what ODI wrote in the letter to 18 Chrysler Group on June 3, 2013? 19 A. That's what it says. 20 Q. Does Chrysler Group deny that? 21 A. I don't deny what's in this letter in 22 terms of the factual listing here. 23 Q. All right. Do you know how many Americans 24 have died in wrecks where Chrysler Jeeps with rear 25 gas tanks were hit in the rear and caught fire just	Page 29 1 Q. Show you Plaintiffs' Exhibit No. 41. This 2 is our list. 3 Can you admit or deny that all of these 4 people have been burned in Jeep fires where Jeeps 5 with rear gas tanks were hit in the rear since 6 March 6, 2012? 7 MS. OWENS: Objection to form of the 8 question. 9 A. I have no knowledge. 10 BY MR. BUTLER: 11 Q. Were you aware of the last one on this 12 list, the death of Kayla White on November 11, 2014? 13 A. No. 14 Q. That occurred in Detroit; correct? 15 A. That's what this says. 16 Q. Chrysler Group's headquarters is in Auburn 17 Hills, Michigan; correct? 18 A. Correct. 19 Q. That's a suburb of Detroit? 20 A. I don't know that it's a suburb, but it's 21 a city around Detroit, yes. 22 Q. Do you know Judson Estes? 23 A. No. 24 Q. I can't remember how far he said Auburn 25 Hills -- or strike that.

Page 30 1 I can't remember how far Mr. Estes said 2 the scene of this wreck was from the Chrysler Group 3 headquarters, like 20-something miles. Nobody has 4 mentioned this death of Kayla White to you? 5 A. No. 6 Q. Will you agree that Chrysler Group should 7 have more information than anyone in the world about 8 Jeep rear impact wrecks where the fuel -- where the 9 gas tank failed and there was a gas-fed fire and 10 someone was burned? 11 MS. OWENS: Objection to the form of the 12 question. 13 A. I don't know how to answer your question. 14 "The world" is a pretty general statement. 15 BY MR. BUTLER: 16 Q. Shouldn't Chrysler Group keep up with that 17 information? 18 A. I think Chrysler Group does. 19 Q. Well, my question was shouldn't Chrysler 20 Group keep up with that information? 21 A. Yes. You qualified it by saying "in the 22 world," and I don't know whether it's true or not. 23 But certainly Chrysler Group should know, and it 24 does. 25 Q. All right. And shouldn't Chrysler Group,	Page 32 1 A. I think Chrysler Group has all the 2 requisite knowledge that it needs to have in 3 connection with these incidents. 4 BY MR. BUTLER: 5 Q. Isn't it the duty of an automaker to know 6 more than anybody else about its own products? 7 MS. OWENS: Objection to the form of the 8 question. 9 A. I think it's fair to say that Chrysler 10 knows probably more than most people about its own 11 products, yes. 12 BY MR. BUTLER: 13 Q. That wasn't my question, sir. My question 14 is broader than that. 15 Isn't it the duty of an automaker to know 16 more about its own products than anybody else? 17 MS. OWENS: Same objection. 18 A. It builds them. It knows them. It knows 19 them well. 20 BY MR. BUTLER: 21 Q. Doesn't it have a duty to know them better 22 than anybody else? 23 A. I don't know that. That's a moral 24 statement. I don't know whether other people have a 25 right to know more than we do. I have no idea.
Page 31 1 since these are its products, know that information 2 more than anybody else? 3 MS. OWENS: Objection to the form of the 4 question. 5 A. It's possible. It certainly has a -- it 6 has all the information. 7 BY MR. BUTLER: 8 Q. No, the question wasn't wouldn't. The 9 question was shouldn't it, shouldn't Chrysler Group. 10 Since these are Chrysler Group products, shouldn't 11 Chrysler Group have more information about that than 12 anybody in the world? 13 MS. OWENS: Objection to the form of the 14 question. 15 A. I have tried to answer it. I think 16 Chrysler Group does have that information. 17 BY MR. BUTLER: 18 Q. That wasn't my question. I'll try one 19 more time. 20 As a matter of ethics and responsibility, 21 since these are Chrysler Group products, shouldn't 22 Chrysler Group have more information about Jeep 23 fires than anybody in the world? 24 MS. OWENS: Objection to the form of the 25 question.	Page 33 1 Q. All right. Would you agree that an 2 automaker ought to know more about the field 3 performance of its automobiles in real world wrecks 4 than anybody else? 5 MS. OWENS: Objection to the form of the 6 question. 7 A. I think Chrysler has all the requisite 8 knowledge to make that evaluation. 9 BY MR. BUTLER: 10 Q. Will you agree that Remi's wreck is not 11 the first time that this has happened, a Jeep car 12 with a rear gas tank got hit in the rear, the gas 13 tank failed, there was a gas-fed fire, and someone 14 got burned? 15 A. Based on what I know, the answer is yes. 16 Q. Will you agree that that has happened many 17 times before? 18 MS. OWENS: Objection to the form of the 19 question. 20 A. It has happened before. 21 BY MR. BUTLER: 22 Q. Will you agree that that has happened many 23 times before it happened to Remi? 24 MS. OWENS: Same objection. 25 A. It's happened more than once, yes.

Page 34 1 BY MR. BUTLER: 2 Q. Will you agree that it is going to happen 3 again in the future? 4 A. I have no knowledge. 5 Q. Isn't it true, sir, that it is a dead 6 certainty that more Americans are going to burn in 7 Jeep's rear gas tanks that get hit in the rear in 8 the future after today, January 9, 2015? 9 MS. OWENS: Objection to the form of the 10 question. 11 A. I have no way of knowing. 12 BY MR. BUTLER: 13 Q. Isn't it true, sir, that the only way to 14 keep more Americans from burning in the future after 15 today in Jeeps with rear gas tanks that get hit in 16 the rear is to take them all off the road? 17 MS. OWENS: Objection to the form of the 18 question. 19 A. I have no way of answering that 20 suggestion. 21 BY MR. BUTLER: 22 Q. Do you deny that many people have been 23 burned in these Jeeps with rear gas tanks just since 24 March 6, 2012, when Remi Walden got burned? 25 MS. OWENS: Objection to the form of the	Page 36 1 11 inches from the rear, don't they? 2 A. I don't know whether -- 3 MS. OWENS: Objection to the form of the 4 question. 5 A. I don't know. But they are different 6 architectures. 7 BY MR. BUTLER: 8 Q. You know that they're different 9 architectures, but you don't know that every one of 10 these Jeeps with a rear gas tank has a gas tank 11 around 11 inches from the back of the car? You 12 don't know that? 13 A. I do not know that. 14 Q. Isn't it true, sir, that every one of 15 these Jeeps with rear gas tanks has a gas tank that 16 hangs five-and-a-half to six-and-a-half inches below 17 the bottom of the car? 18 MS. OWENS: Objection to the form of the 19 question. 20 A. I do not know that. 21 BY MR. BUTLER: 22 Q. Isn't it true, sir, that every one of 23 these Jeeps with the rear gas tank is an SUV, and 24 the back of the car is higher off the ground than 25 the back of the car is in passenger cars?
Page 35 1 question. 2 A. I don't know about the term "many." As I 3 understand, there have been other incidents, as 4 you've shown me; but these apply to a variety of 5 vehicles. Jeep's is -- Jeep is a brand. It's not a 6 particular vehicle. 7 BY MR. BUTLER: 8 Q. They apply to Jeeps with rear gas tanks, 9 don't they? 10 A. No, but there are phenomenally different 11 architectures in vehicles. Jeep is not one car. 12 Jeep is a variety of models of cars. 13 Q. What is phenomenally different 14 architecture, sir? What are you talking about? 15 A. These cars are different, one from the 16 other. 17 Q. Which cars? 18 A. The Liberty is phenomenally different than 19 a Jeep Cherokee and a Grand Cherokee. They're 20 different cars. 21 Q. They've all got a gas tank at the rear, 22 don't they? 23 A. No, but it's structurally different. The 24 architecture -- 25 Q. They have all got a gas tank within	Page 37 1 A. That's normally true of all SUVs. 2 MR. BUTLER: Off the video just a minute. 3 I want to grab a file. 4 (Off video record.) 5 MR. BUTLER: Let's go back on the video. 6 THE VIDEOGRAPHER: We are back on the 7 video. You may continue. 8 (Plaintiffs' Exhibit #74 marked) 9 BY MR. BUTLER: 10 Q. Sir, I want to show you a series of 11 photographs, Plaintiffs' Exhibit No. 74. 12 Do you recognize that as the 1993 through 13 1998 Grand Cherokee? 14 A. It looks like a 1993 to 1998 Grand 15 Cherokee. I do not have specific knowledge of this 16 vehicle. I wasn't here when the car was designed or 17 built, but it looks like a Jeep, and it looks like a 18 1993 to 1998. 19 Q. That's one of the vehicles for which 20 Chrysler Group, LLC, is responsible, is it not? 21 MS. OWENS: Objection to the form of the 22 question; calls for a legal conclusion. 23 A. It's one -- yeah. I mean, I don't know. 24 From a legal standpoint, I have no idea how to 25 answer your question.

Page 38 1 BY MR. BUTLER: 2 Q. Do you deny that Chrysler Group, LLC, your 3 corporation, is responsible for that car -- 4 A. I think it has -- 5 Q. -- the 1993 through 1998 Grand Cherokee, 6 "yes" or "no"? 7 MS. OWENS: Object to the form of the 8 question. 9 A. I think we've assumed product liability in 10 connection with these vehicles. 11 BY MR. BUTLER: 12 Q. Is that a "yes" or a "no"? 13 A. It's a yes the way I've answered it. 14 (Plaintiffs' Exhibit #75 marked) 15 BY MR. BUTLER: 16 Q. I'll show you Plaintiffs' Exhibit No. 75. 17 Isn't this a photograph of the back of the 18 1999 through 2004 Grand Cherokee? 19 A. I have no way of knowing, but it looks 20 like a 1999 to 2004 Cherokee, Grand Cherokee. 21 Q. Is this another Chrysler vehicle for which 22 Chrysler Group, LLC, your corporation, is 23 responsible? 24 MS. OWENS: Same objection. 25 A. As answered before, I think it's assumed	Page 40 1 A. The same answer as before, I think it's 2 accepted product liability. 3 BY MR. BUTLER: 4 Q. For this vehicle? 5 A. For this vehicle. 6 Q. Now, you said, and I quote, that these 7 vehicles were all "phenomenally different." 8 Do you see in each of these pictures, if 9 you'll spread them out in front of you, if you 10 would, sir, just humor me, and put them out so you 11 can look at all of them. 12 A. (Witness complies with request.) 13 Q. Do you see that the gas tanks are all 14 lo- -- are all circled in red? 15 A. Yes. Yes. 16 Q. Do you see the gas tanks are all at the 17 rear? 18 A. Yes. 19 Q. Do you see that all -- the gas tanks on 20 all of these vehicles are below the rear of the 21 vehicle? 22 A. Yes. 23 Q. Would you agree, sir, that if the gas tank 24 on one of these vehicles explodes in rear impact, 25 the automaker ought to look at the other vehicles
Page 39 1 product liability in connection with this car, this 2 vehicle. 3 (Plaintiffs' Exhibit #76 marked) 4 BY MR. BUTLER: 5 Q. I'll show you a picture of -- this is 6 Plaintiffs' Exhibit 76. 7 This is the 1993 through 2001 Cherokee. 8 Do you recognize that car? 9 A. It looks like a 1993 to 2001 Cherokee. 10 Q. Is this another vehicle for which your 11 corporation, Chrysler Group, LLC, has assumed 12 responsibility? 13 MS. OWENS: Same objection. 14 A. It has assumed product liability for this 15 car, correct. 16 (Plaintiffs' Exhibit #77 marked) 17 BY MR. BUTLER: 18 Q. I'll show you Plaintiffs' Exhibit No. 77. 19 This is a picture of the back of a 2002 to 20 2007 Liberty; correct? 21 A. Looks that way. 22 Q. Now, is this another vehicle for which 23 your corporation, Chrysler Group, LLC, has accepted 24 responsibility? 25 MS. OWENS: Same objection.	Page 41 1 that also have similar rear gas tanks to see if they 2 have got a problem, too? 3 MS. OWENS: Objection to the form of the 4 question. 5 A. I think that Chrysler has carried out 6 extensive analysis on the frequency of these events, 7 and it's determined, based on its analysis, which 8 has been shared with NHTSA, that the performance of 9 these vehicles is not distinguishable from what the 10 other automakers are providing into the marketplace. 11 These cars were all, at the time they were 12 designed and built, were either in conformity or in 13 excess of the safety requirements required under 14 U. S. regulations. 15 And our analysis -- which is the point 16 that we've made publicly, after I received this 17 letter on I think it was June the 3rd, that our 18 analysis of that data suggested these were 19 defect-free vehicles, and that they performed 20 exactly as the rest of the comparative class 21 performed in the marketplace at the time. 22 MR. BUTLER: Move to strike as totally 23 unresponsive to anything that I asked. 24 BY MR. BUTLER: 25 Q. But, sir, I will assure you that we will

Page 42 1 get to this morning every subject matter that you've 2 just touched upon. 3 A. Okay. 4 Q. Let me ask my question again. 5 Would you agree, sir, that in the gas -- 6 if the gas tank on one of these vehicles explodes in 7 rear impact, then the automaker ought to look at the 8 other vehicles that also have similar rear gas tanks 9 to see if they have got a problem also? 10 MS. OWENS: Same objection. 11 A. I think Chrysler has looked at that 12 particular type of analysis, and it's carried out 13 pretty expensive -- extensive review of the tanks in 14 connection with the whole class of vehicles. 15 MR. BUTLER: Move to strike as 16 nonresponsive. 17 BY MR. BUTLER: 18 Q. Let me see if I can ask the question in a 19 different way. 20 Would you agree with me that what happens 21 to one of these four vehicles that gets hit in the 22 rear ought to teach the automaker something about 23 what could happen to the other auto- -- other one of 24 these vehicles that also have rear gas tanks if it 25 gets hit in the rear?	Page 44 1 BY MR. BUTLER: 2 Q. Not just me, but other people have a right 3 to disagree with you as well, don't they? 4 A. Absolutely. I think everybody has a right 5 to disagree. 6 Q. Isn't it true that Chrysler Group is not 7 making and selling any passenger cars now that have 8 rear gas tanks? 9 A. That's probably true. 10 Q. Isn't it true that Chrysler moved the gas 11 tank in the Grand Cherokee away from the rear to the 12 midship's location for the 2005 model? 13 A. That's my understanding. 14 Q. Will you agree that for citizens to make 15 an informed decision whether those rear gas tanks 16 are safe, they first need to know the facts? 17 MS. OWENS: Objection to the form of the 18 question. 19 A. I guess, yes. 20 BY MR. BUTLER: 21 Q. What has Chrysler Group done to inform 22 people that the gas tank on the Grand Cherokee is 23 only 11 inches from the back of the car? 24 MS. OWENS: Objection to the form of the 25 question.
Page 43 1 MS. OWENS: Objection to the form of the 2 question. 3 A. I don't know. 4 BY MR. BUTLER: 5 Q. Well, isn't that merely logical, that if 6 one of these gas tanks -- one of these vehicles -- 7 strike that. 8 Isn't it merely logical that if one of 9 these four vehicles gets hit in the rear and the gas 10 tank explodes and people burn to death, then 11 Chrysler ought to be looking at whether or not that 12 might happen in one of these other four vehicles 13 that similarly have gas tanks at the rear in the 14 same location? 15 MS. OWENS: Objection to the form. 16 A. I think it is one of the things that 17 Chrysler has and would look at, yes. 18 BY MR. BUTLER: 19 Q. Will you agree, sir, that others have 20 every right to disagree with the opinion that you 21 have expressed that the Jeeps with rear gas tanks 22 are, quote, "absolutely safe," close quote? 23 MS. OWENS: Objection to the form of the 24 question. 25 A. I guess you have a right, yes.	Page 45 1 A. Your statement is visible. It doesn't 2 have to be -- I mean, as you indicated in the 3 picture, there is nothing to be highlighted. 4 BY MR. BUTLER: 5 Q. You think people should notice that? 6 MS. OWENS: Objection to the form of the 7 question. 8 A. As they will look at any other attributes 9 of the car, yes. 10 BY MR. BUTLER: 11 Q. Do you think people are aware of where the 12 gas tanks are? 13 MS. OWENS: Objection to the form of the 14 question. 15 A. I don't know. 16 BY MR. BUTLER: 17 Q. Isn't it true that on the Grand -- on the 18 1999 through 2004 Grand Cherokees the gas tank is 19 hidden by a piece of plastic trim that Chrysler 20 Group calls the fascia? 21 MS. OWENS: Objection to the form of the 22 question. 23 A. I'm not sure it's hidden, but... 24 BY MR. BUTLER: 25 Q. Well, have you ever walked --

Page 46 1 MS. OWENS: Excuse me. I'm sorry. Were 2 you finished with your answer? 3 THE WITNESS: I think so. 4 MS. OWENS: Okay. 5 BY MR. BUTLER: 6 Q. Have you ever walked around the back of 7 one of those Grand Cherokees? 8 A. Yes. 9 Q. Mm-hmm. Was it -- was the gas tank 10 readily visible? 11 A. I don't remember. 12 Q. Okay. We'll get to that in a minute. 13 Has Chrysler Group ever warned the people 14 that, look out, now, this gas tank is only 11 inches 15 from the back of the car? 16 MS. OWENS: Objection to the form of the 17 question. 18 A. No. 19 BY MR. BUTLER: 20 Q. Has Chrysler Group ever warned people that 21 this gas tank on the Grand Cherokee is vulnerable to 22 rear impact? 23 A. No. 24 Q. Has Chrysler Group ever warned the people 25 that the gas tank on this Grand Cherokee, the 1999	Page 48 1 BY MR. BUTLER: 2 Q. You would expect the gas tank to be 3 crushed against the axle, would you not? 4 A. I -- 5 MS. OWENS: Objection to the form of the 6 question. 7 A. -- I can't answer your question. I don't 8 know. 9 BY MR. BUTLER: 10 Q. Isn't it true that this wreck in which 11 Remi Walden died was an underride wreck? 12 A. I don't have enough knowledge. 13 Q. What has Chrysler Group done to inform the 14 people of what the danger really is if a rear gas 15 tank on one of these Jeeps gets crushed? 16 A. It has carried out extensive discussions 17 with NHTSA. On this matter it has shared its 18 information. It has had intense dialogue with the 19 technical staff of NHTSA to try and determine 20 whether effectively this was a defect or not. 21 Our analysis suggests very clearly that 22 this is not a defect. It is a position that in this 23 particular case has been supported and shared by 24 NHTSA, which has come to the same conclusion that 25 Chrysler has that this is not a defect.
Page 47 1 Grand Cherokee, is in a known crush zone? 2 A. No. 3 Q. Has Chrysler Group ever warned the people 4 that the gas tank on the 1999 Grand Cherokee hangs 5 six inches below the bottom of the car? 6 A. No. 7 Q. Has Chrysler Group ever warned the people 8 that if in a rear impact there is an underride, the 9 gas tank can be hit directly by the striking 10 vehicle? 11 A. No. 12 Q. Now, will you agree with me, sir, that 13 that would be very bad if the gas tank got hit by 14 the striking vehicle directly? 15 MS. OWENS: Objection to the form of the 16 question. 17 A. In principle, yes. 18 BY MR. BUTLER: 19 Q. Well, you would expect an explosion then, 20 wouldn't you? 21 MS. OWENS: Objection -- 22 A. No -- 23 MS. OWENS: -- to the form of the 24 question. 25 A. -- I would not.	Page 49 1 MR. BUTLER: Move to strike as 2 nonresponsive. 3 BY MR. BUTLER: 4 Q. But in case that motion is overruled, sir, 5 isn't it true that all those arguments Chrysler 6 Group made to NHTSA were rejected by the 7 professionals of the Office of Defects 8 Investigation -- 9 MS. OWENS: Objection to the form of the 10 question. 11 BY MR. BUTLER: 12 Q. -- and that is why you got that June 3, 13 2013, letter? 14 MS. OWENS: Objection to the form of the 15 question. 16 A. To the best of my knowledge not. 17 BY MR. BUTLER: 18 Q. Isn't it true, sir, that what caused the 19 administrator of NHTSA and his boss ultimately to 20 agree with you was a meeting you had with those two 21 in Chicago on June 10, 2013? 22 A. What are you -- I'm sorry. To agree what? 23 BY MR. BUTLER: 24 Q. Isn't it true, sir, that the Office of 25 Defects Investigation said these Jeeps with the rear

Page 50 1 gas tanks were defective? 2 MS. OWENS: Objection to the form of the 3 question. 4 A. They had raised issues in their letter 5 that suggested that there were -- there were 6 problems with our vehicles, some of our vehicles, 7 yes -- 8 BY MR. BUTLER: 9 Q. This says -- 10 A. -- which was reflected in this letter of 11 June 3rd, 2013. 12 MR. BUTLER: Let's go off video just a 13 minute. 14 THE VIDEOGRAPHER: We're off. 15 MR. BUTLER: Oh, here it is. No, go back 16 on. Here it is. 17 THE VIDEOGRAPHER: We're still on, sir. 18 BY MR. BUTLER: 19 Q. The professionals at the Office of Defects 20 Investigation didn't just suggest there may be 21 problems. Look at the second paragraph of this 22 letter. 23 A. On which page? 24 Q. Page 1. 25 A. Yes.	Page 52 1 installed on these vehicles are subject to failure 2 when the vehicles are struck from the rear." 3 Did I read that correctly? 4 A. That's what it says. 5 Q. Well, Chrysler Group has admitted that's 6 true, has it not? 7 MS. OWENS: Objection to the form of the 8 question. 9 A. I don't think so. 10 BY MR. BUTLER: 11 Q. Did you read the deposition of Mr. Judson 12 Estes taken 29 days ago? 13 A. No, I did not. 14 Q. Are you not aware of the fact that 15 Mr. Estes admitted that these Jeeps with the 16 Grand -- the gas tanks on these Jeeps are 17 vulnerable -- strike all that. 18 Are you not familiar with the fact that 19 Mr. Estes on December 10, 2014, admitted that the 20 gas tanks on these Jeeps were, quote, "vulnerable to 21 rear impact," close quote? 22 MS. OWENS: Objection to the form -- 23 A. I have no idea -- 24 MS. OWENS: -- of the question. 25 A. I have no idea who Mr. Estes is.
Page 51 1 Q. They wrote that these Jeeps with the rear 2 gas tanks, quote, "contained defects related to 3 motor vehicle safety." 4 Isn't that correct? 5 A. That's what it says. 6 Q. All right. Look at Page 12 under 7 Conclusion. 8 A. (Witness complies with request.) 9 Q. Isn't it true that the professionals at 10 the Office of Defects Investigation wrote, quote: 11 "There is a performance and a design defect"? 12 MS. OWENS: I'm sorry. Where are you? 13 MR. BUTLER: Page 12, under the 14 Conclusion. 15 MS. OWENS: But where? Yeah, and there 16 is -- 17 A. Where? 18 MS. OWENS: -- which paragraph? 19 MR. BUTLER: First paragraph, third line 20 down. 21 MS. OWENS: Thank you. 22 BY MR. BUTLER: 23 Q. They wrote, quote, "In our tentative view 24 there is a performance defect and a design defect. 25 The performance defect is that the fuel tanks	Page 53 1 BY MR. BUTLER: 2 Q. Has anybody told you that he testified to 3 that? 4 MS. OWENS: Objection to the form of the 5 question -- 6 A. They may have. I don't -- 7 MS. OWENS: -- to the extent it calls for 8 attorney/client communications. 9 BY MR. BUTLER: 10 Q. Has anybody told you that he testified to 11 that? 12 MS. OWENS: Same objection. 13 A. No. 14 BY MR. BUTLER: 15 Q. Have you read Mr. Estes' deposition? 16 A. No. 17 Q. Do you care what Mr. Estes said? 18 A. I don't know who Mr. Estes is. 19 Q. Is that a "yes" or a "no"? 20 A. If you tell me who he is, I might express 21 an opinion. 22 Q. Under Conclusion, three lines down, the 23 Office of Defects Investigations also wrote, quote: 24 The design defect is the placement of the fuel tanks 25 in the position behind the axle and how they were

Page 54 1 positioned, including the height -- "their height 2 above the roadway. The defects -- 3 A. I'm sorry, which paragraph are you on? 4 MS. OWENS: Same paragraph. The first 5 paragraph. 6 MR. BUTLER: Strike all that, and I'll 7 start all over. 8 MS. OWENS: Six lines down. 9 BY MR. BUTLER: 10 Q. Let's see under Conclusion six lines down 11 the Office of Defects Investigation also wrote to 12 Chrysler Group, quote, "The design defect is the 13 placement of the fuel tanks in the position behind 14 the axle and how they are positioned, including 15 their height above the roadway. The defects present 16 an unreasonable risk to motor vehicle safety." They 17 left out the word safety. 18 Did I read that correctly? 19 A. Yes. 20 Q. And then it said -- then the Office of 21 Defects Investigation said: "Because people in 22 model year 1993-2004 Jeep Grand Cherokees and the 23 model year 2002-2007 Jeep Libertys and in striking 24 vehicles have burned to death in rear impact 25 crashes."	Page 56 1 have done the work necessary for me to make the 2 assertion. 3 Q. But you don't know if your assertion is 4 true or not. You're just repeating what people have 5 told you; isn't that true? 6 A. I repeat what the information that has 7 been provided to me suggests is the case, yes. 8 (Plaintiffs' Exhibit #42 marked) 9 BY MR. BUTLER: 10 Q. Show you Plaintiffs' Exhibit No. 42. 11 Isn't this the affidavit that you signed 12 in this case? 13 A. Yes. 14 Q. Doesn't it say over here in Paragraph 6, 15 starting the third line from the bottom: "I was not 16 involved in statistical performance testing or 17 design analysis related to the NHTSA investigation. 18 Other Chrysler Group, LLC, employees or former 19 employees have personal knowledge related to the 20 NHTSA investigation." 21 Isn't that what it says? 22 A. Absolutely. And it's absolutely true. 23 Q. Did you sign this affidavit? 24 A. Yes, I did. 25 Q. Why did you sign this affidavit?
Page 55 1 Did I read that correctly? 2 A. Yes, you have. 3 Q. All right. Now, has Chrysler warned the 4 people that if you're in one of these Jeeps with a 5 rear gas tank and your car gets hit in the rear, the 6 gas tank may explode? 7 MS. OWENS: Objection -- 8 A. No. 9 MS. OWENS: -- to the form of the 10 question. 11 BY MR. BUTLER: 12 Q. That is the danger, is it not? 13 A. Not in our view. 14 Q. You don't think there is any danger of gas 15 tanks on these Jeeps with rear gas tanks exploding 16 after rear impact? 17 A. Any, yes, it's possible. But it's not a 18 safety defect. And I think we've been absolutely 19 clear on this issue after having gone through an 20 incredibly thorough review of the underlying data 21 and having shared that data with NHTSA. 22 Q. Sir, isn't it true that you don't know 23 anything about that? You just know what other 24 people at Chrysler Group have told you. 25 A. Yes, I have people that report to me that	Page 57 1 MS. OWENS: Object to the form of the 2 question. 3 A. It's to provide this information to 4 whoever was interested in getting it. It's that 5 simple. 6 BY MR. BUTLER: 7 Q. Who was interested in getting it? 8 A. That it was in connection with this case, 9 as I understand it. 10 Q. The Walden case? 11 A. Yes. 12 Q. Who asked you to sign this affidavit? 13 MS. OWENS: Objection -- 14 A. Counsel. 15 MS. OWENS: -- to the form of the 16 question. 17 A. Counsel. 18 BY MR. BUTLER: 19 Q. Who? 20 MS. OWENS: Objection to the form of the 21 question. 22 BY MR. BUTLER: 23 Q. Give me the name of the counsel. 24 A. It's think it's Margie Loeb. 25 Q. Were you in Michigan when you signed it?

Page 58 1 A. Yes. 2 Q. Did you understand that this -- they asked 3 you to give this affidavit because they didn't want 4 your deposition to be taken? 5 MS. OWENS: Objection to the form of the 6 question to the extent it calls for attorney/client 7 communications. 8 THE WITNESS: Do I answer it, or? 9 MS. OWENS: Don't reveal any 10 communications you had with Counsel. 11 BY MR. BUTLER: 12 Q. Isn't it true that the reason you signed 13 this affidavit was in an attempt to avoid giving the 14 deposition that you are here today having to give? 15 A. No. I think it was simply to lay out the 16 facts of what I did know and what I did not know. 17 Q. Look at Paragraph 4 of your affidavit, 18 sir. 19 A. Yeah. 20 Q. Now, you swore that the statements in this 21 affidavit were true; correct? 22 A. Yeah. 23 Q. In Paragraph 4, it says: "I have been 24 informed that plaintiffs in this case wish to take 25 my deposition."	Page 60 1 Q. What counsel? 2 A. Counsel in this room. 3 Q. Which ones? 4 A. All four -- 5 Q. That would be -- 6 A. -- the middle gentleman excepted. 7 Q. That would be Ms. Owens, Mr. Westenberg, 8 Ms. Van Der Wiele and Ms. Loeb? 9 A. Correct. 10 Q. All right. Where? 11 A. In Detroit; in Auburn Hills to be exact. 12 Q. You were in Auburn Hills yesterday? 13 A. Yes. 14 Q. Were all of these counsel there? 15 A. Yes. 16 Q. Okay. Did you have a meeting with counsel 17 before this deposition? 18 A. No. Well, yesterday. 19 Q. Yesterday. How long was the meeting? 20 A. Two-and-a-half hours. 21 Q. Morning, or afternoon? 22 A. Morning. 23 Q. Had you met with anybody other than 24 yesterday morning to prepare for this deposition? 25 A. No.
Page 59 1 Do you see that? 2 A. Yes. 3 Q. Wasn't this affidavit filed together with 4 a Motion for Protective Order filed by Chrysler 5 Group to prevent your deposition from being taken? 6 A. I don't know about a protective order. I 7 know that I filed -- this was filed in connection 8 with your request to hear me out. 9 Q. Your affidavit also says in Paragraph 4, 10 the last line on the first page: "I am not aware of 11 other case allegations and have no personal 12 knowledge of the facts or circumstances of the 13 accident." 14 A. True. 15 Q. Did I read that correctly? 16 A. Yes. 17 Q. Since you -- you signed this affidavit on 18 July 7, 2014; correct? 19 A. Yes. 20 Q. Since you signed this affidavit, have you 21 learned anything about the accident in which Remi 22 Walden was burned? 23 A. I was briefed yesterday. 24 Q. By whom? 25 A. By counsel.	Page 61 1 Q. Prior to yesterday morning, and since you 2 signed your affidavit on July 7, 2014, where you 3 said you didn't know anything about the accident in 4 which Remi Walden burned, had you asked anybody 5 about that accident? 6 MS. OWENS: Objection to the form of the 7 question. 8 A. No. 9 BY MR. BUTLER: 10 Q. Do you admit that Chrysler Group, LLC, is 11 responsible for the 1999 Grand Cherokee? 12 MS. OWENS: Objection to the form of the 13 question; it calls for a legal conclusion. 14 You may answer. 15 A. I think it's assumed responsibility for 16 product liability on those -- on those vehicles, 17 yes. 18 BY MR. BUTLER: 19 Q. Isn't it true that you and Chrysler Group 20 accepted responsibility for that vehicle and told 21 the Bankruptcy Court in New York, the Congress and 22 the American people that you were responsible for 23 the 1999 Grand Cherokee and all these Jeeps with 24 rear gas tanks? 25 MS. OWENS: Same objection.

Page 62 1 A. I'm not sure what you said is true, but... 2 BY MR. BUTLER: 3 Q. Isn't it true, sir, that you personally 4 signed an agreement that was filed in the Bankruptcy 5 Court in New York where Chrysler Group accepted 6 liability for product liability claims on cars made 7 before 2009 and involved in wrecks after 2009? 8 A. Correct. 9 (Plaintiffs' Exhibit #44 marked) 10 BY MR. BUTLER: 11 Q. Show you Plaintiffs' Exhibit No. 44, sir. 12 Is this a court document filed in the 13 United States Bankruptcy Court in New York? 14 A. That's what it says, yes. 15 Q. Is it a Stipulation and Agreed Order 16 Approving Amendment No. 4 to the Master Transaction 17 Agreement? 18 A. Yes. 19 Q. Is it signed by you as Chief Executive 20 Officer of Fiat S.p.A.? 21 A. Correct. 22 Q. Is that your signature? 23 A. Yes, it is. 24 Q. Isn't it true that by this Stipulation and 25 Agreed Order, Chrysler Group accepted liability for	Page 64 1 A. Yeah. 2 Q. Is that a "yes"? 3 A. I do see the letter, yes. 4 Q. All right. Had you seen this letter 5 before? 6 A. No, I have not. 7 Q. It's on Chrysler stationery; correct? 8 A. Correct. 9 Q. The first line indicates that it's written 10 on behalf of Chrysler Group, LLC; correct? 11 A. Correct. 12 Q. Now, if you look at the second 13 paragraph -- and before I read the part of this 14 letter that I want the jury to hear -- Old Carco, 15 the name Old Carco refers to what was formerly known 16 before the bankruptcy as Chrysler, LLC; correct? 17 A. Yes. 18 Q. All right. In the third paragraph, second 19 sentence, isn't it true that Chrysler Group 20 represented to Senator Durbin, quote, "We will 21 announce today that the company will accept product 22 liability claims on vehicles manufactured by Old 23 Carco before June 10 that are involved in accidents 24 on or after that date," close quote. 25 Did I read that correctly?
Page 63 1 product liability claims involving these Jeeps with 2 rear gas tanks? 3 MS. OWENS: Objection to the form of the 4 question. 5 A. It accepted liability for whatever is 6 contained in this amendment. 7 BY MR. BUTLER: 8 Q. Isn't it true that Chrysler Group told the 9 United States Congress that it was accepting 10 liability for these vehicles? 11 MS. OWENS: Objection to the form of the 12 question. 13 A. I'm not aware of any communication with 14 Congress on this matter directly, but... 15 BY MR. BUTLER: 16 Q. Do you know John T. Bozzella? 17 A. I know Mr. Bozzella. 18 Q. Is he still with Chrysler Group? 19 A. No, he's not. 20 (Plaintiffs' Exhibit #45 marked) 21 BY MR. BUTLER: 22 Q. Show you Plaintiffs' Exhibit No. 45, sir. 23 Isn't this a letter from Mr. Bozzella to 24 United States Senator Richard Durbin dated 25 August 27, 2009?	Page 65 1 A. Yes, you did. 2 Q. That would be June 10, 2009; correct? 3 A. That would be -- what would be June 10th? 4 I'm sorry. 5 Q. Well, he refers to June 10. He's 6 obviously talking about June 10, 2009; correct? 7 A. June 10th, 2009, was the day we came out 8 of bankruptcy. 9 Q. Yes, sir. And that's the June 10 he's 10 talking about? 11 A. Yes, it is. 12 Q. All right. Now, this letter to Senator 13 Durbin was also copied to Chairman Patrick Leahy? 14 A. Yeah. 15 Q. Who's also a senator? 16 A. Yes. 17 Q. Senator Arlen Specter? 18 A. Yes. 19 Q. Senator Herb Kohl? 20 A. Yes. 21 Q. Did you know this letter had been sent? 22 A. No. 23 Q. It was sent to other members of Congress 24 as well, was it not? 25 A. I do not know.

Page 66 1 Q. Now -- 2 A. But this decision was agreed with me. I 3 mean, this was not written without my consent. I 4 had no idea that the letter had been issued, but the 5 agreement on the subject matter had been reached 6 with my office before. 7 Q. And you agreed to this decision? 8 A. I agreed with that decision. 9 Q. All right. And is it true that the Walden 10 Grand Cherokee, which was a 1999 model, was made and 11 sold by Chrysler before June 10, 2009? 12 A. It was purchased -- it was built before 13 2009. 14 Q. Is that a "yes"? 15 A. Yes, I think so. 16 Q. Is it true the date that Remi Walden died, 17 March 6, 2012, is after June 10, 2009? 18 A. Yes. 19 Q. Isn't it also true that Chrysler Group 20 explicitly told the press and the American public 21 the same thing they told the Bankruptcy Court in New 22 York and the same thing they told the United States 23 Congress: That Chrysler Group would accept 24 responsibility for product liability claims on 25 vehicles made before June 10, 2009, that are	Page 68 1 1999 Grand Cherokee, then it is dishonest for 2 Chrysler Group to tell Judge Chason, the judge in 3 this case, the exact opposite? 4 MS. OWENS: Objection to the form of the 5 question. 6 A. If the statement that Chrysler has made is 7 in contradiction of what this press release says, 8 the answer is correct. I don't think we have. 9 BY MR. BUTLER: 10 Q. The answer is that would be dishonest, 11 wouldn't it? 12 A. If we -- 13 MS. OWENS: Objection to the form of the 14 question. 15 A. If we denied what we said in the press 16 release it would be dishonest, yes. 17 BY MR. BUTLER: 18 Q. Thank you, sir. 19 Isn't it true, sir -- well, let me strike 20 that -- 21 MS. OWENS: Jim, are we at a place -- 22 MR. BUTLER: Shortly. 23 MS. OWENS: -- to break? 24 MR. BUTLER: Shortly. 25 / / /
Page 67 1 involved in wrecks after June 10, 2009? 2 A. I think we have made that position public, 3 yes. 4 (Plaintiffs' Exhibit #46 marked) 5 BY MR. BUTLER: 6 Q. Show you Plaintiffs' Exhibit No. 46. 7 This is, in fact, a press release from 8 Chrysler, is it not? 9 A. Yeah. 10 Q. And it says the same thing, tells the 11 press the same thing; right? 12 A. Yeah. 13 Q. Excuse me, sir? 14 A. Yes, it does. 15 Q. Okay. A press release goes to the press; 16 right? 17 A. Yes. 18 Q. That's the purpose of it? 19 A. Yeah. 20 Q. Will you agree with me, sir, that when 21 Chrysler Group have -- and you, have told the 22 Bankruptcy Court in New York, and when Chrysler 23 Group has told the United States Congress and the 24 press and people that Chrysler Group will accept 25 responsibility for product liability claims on this	Page 69 1 (Plaintiffs' Exhibit #47 marked) 2 BY MR. BUTLER: 3 Q. Plaintiffs' Exhibit No. 47. 4 Have you seen that before? 5 A. No. 6 Q. Well, this is -- I didn't -- I didn't copy 7 all of Chrysler Group's Motion for Summary Judgment 8 in this case because the case has already been -- 9 we've killed enough trees already in this 10 litigation. But this is the first page and the 11 second page and the last page of the Motion for 12 Summary Judgment that Chrysler Group filed before 13 Judge Chason in this case. 14 Have you seen that before? 15 A. No. 16 Q. Look, if you would, at Page 2, first 17 paragraph. 18 A. Yeah. 19 Q. Do you see that first paragraph? 20 A. Yes. 21 Q. It says, quote, "The plaintiffs' 22 negligence claims are predicated on the contention 23 that Chrysler Group is liable as a 24 successor-in-interest to the actual manufacturer of 25 the vehicle, DaimlerChrysler Corporation. This

Page 70 1 premise is false because the claims against 2 DaimlerChrysler Corporation are barred by bankruptcy 3 and the Chrysler Group did not assume liability for 4 the claims alleged here." 5 A. Yes, sir. 6 Q. That's a false statement, isn't it? 7 MS. OWENS: Objection -- 8 A. It is not -- 9 MS. OWENS: -- to the form of the 10 question. 11 A. It is not false. You are now asking me to 12 go back to my legal days. But I think that the 13 statement refers to negligence claims. We accepted 14 responsibility for product liability under the 15 amendment of October 2000- -- 2009, and which is 16 what is contained in the press release. 17 This is a different statement. I think it 18 says something else. I don't think it denies or 19 contradicts anything other in the press release or 20 on the October 2009 Amendment No. 4 to the 21 bankruptcy proceedings. 22 BY MR. BUTLER: 23 Q. Isn't it true, sir, that in this case 24 plaintiffs have alleged product liability claims? 25 A. I have --	Page 72 1 you very much. 2 THE VIDEOGRAPHER: And we are off the 3 record. The time is 10:25. 4 (Recess 10:25-10:45 a.m.) 5 THE VIDEOGRAPHER: And we are back on the 6 record. The time is 10:46. You may continue, sir. 7 BY MR. BUTLER: 8 Q. Sir, did you talk to Chrysler Group 9 counsel during the break? 10 A. Yes, I did. 11 Q. Did you talk to them about this 12 deposition? 13 A. No. 14 Q. Did you talk to them about this case? 15 A. No. 16 (Plaintiffs' Exhibit #4 marked) 17 BY MR. BUTLER: 18 Q. I asked you earlier if you knew anything 19 about this wreck. I'm going to show you Plaintiffs' 20 Exhibit No. 4. 21 I'll represent to you that's a photograph 22 of the Waldens' 1999 Grand Cherokee in which Remi 23 Walden was a passenger, on fire, on March 6, 2012. 24 Had you seen a photograph like that 25 before?
Page 71 1 MS. OWENS: Objection. 2 A. -- no idea whether they have or not. 3 You're just asking me to opine on this statement. 4 This makes reference to negligence claims. We're 5 talking about something else. 6 BY MR. BUTLER: 7 Q. Well, let's look at this statement at the 8 end here, quote, "Chrysler Group did not assume 9 liability for the claims alleged here," close quote. 10 Do you see that? 11 A. Yes, which is I think it's making 12 reference to the negligence claims in the opening 13 portion of that paragraph. 14 Q. Okay. 15 A. I think -- 16 Q. So if -- 17 A. -- it's factually true. 18 Q. -- if Chrysler Group were to tell Judge 19 Chason that it was not liable for product liability 20 claims in this case, that would be false; correct? 21 A. To the best of my knowledge, yes. 22 Q. All right. Thank you. 23 A. Can we -- 24 MR. BUTLER: You want to take a break? 25 THE WITNESS: Can we take a break? Thank	Page 73 1 A. Yes, I saw it yesterday. 2 Q. Had you seen it before yesterday? 3 A. No. 4 Q. Have you seen photographs of any other 5 Jeeps with rear gas tanks that had been hit in the 6 rear on fire? 7 A. I saw it today when you showed me the 8 last -- 9 Q. Have you seen any other photographs from 10 other wrecks? 11 A. No, I have not. 12 Q. Will you agree with me, sir, that this, 13 that is what's depicted in that photograph -- let me 14 hold it up for the videographer so the jury will 15 know which one we're talking about. 16 Would you agree with me, sir, that this 17 should not happen? 18 MS. OWENS: Objection to the form of the 19 question. 20 A. I think all incidents like this should be 21 avoided, yes. 22 BY MR. BUTLER: 23 Q. Isn't it true that fires like this can be 24 avoided by putting the gas tanks in the midship's 25 location instead of in the crush zone only 11 inches

Page 74 1 from the back of the car? 2 MS. OWENS: Objection to the form of the 3 question. 4 A. I have no way of knowing. 5 BY MR. BUTLER: 6 Q. Will you agree that if this result, this 7 Walden Jeep on fire, is more likely with a rear gas 8 tank than with a midship's gas tank, the people have 9 a right to know that? 10 MS. OWENS: Objection to the form of the 11 question. 12 A. I have no way of knowing. 13 BY MR. BUTLER: 14 Q. Would you agree with me that -- would you 15 agree with me, sir, that if the midship's gas tank 16 location is safer, the automaker has a duty to tell 17 the people that? 18 MS. OWENS: Object to the form of the 19 question. 20 A. I'm not sure how to answer your question, 21 because when this vehicle was built, it was in 22 conformity with the rules that were in place at the 23 time. And when we analyzed the data, including this 24 event, potentially in terms of distributions, we 25 have found that the likelihood of an event like this	Page 76 1 question. 2 A. I have no way of answering that question. 3 BY MR. BUTLER: 4 Q. Has Chrysler told the people that a 5 midship gas tank location is safer than the rear gas 6 tank location? 7 A. To the best of my knowledge not. 8 Q. Have you wondered why Chrysler moved the 9 gas tank away from the rear in these Jeeps with -- 10 that used to have rear gas tanks? 11 A. I personally have not wondered, but the 12 issue has been discussed, yes. 13 Q. All right. Have you seen any documents 14 that discuss the safety of rear versus midship's 15 locations for gas tanks? 16 A. I have not. 17 Q. Have you asked anybody at Chrysler whether 18 Chrysler has got any documents that discuss the 19 relative safety of midship's gas tanks locations -- 20 gas tank locations versus rear gas tank locations? 21 A. I have not. 22 Q. Have you asked anybody whether safety was 23 a reason Chrysler moved the gas tanks in these Jeeps 24 away from the rear? 25 A. No, I haven't.
Page 75 1 is fundamentally not different than it would have 2 been for any other competitor car in that class. 3 MR. BUTLER: Move to strike as not 4 responsive. 5 BY MR. BUTLER: 6 Q. But in the case the Judge doesn't grant my 7 motion, you said, quote, "we have found," close 8 quote. Who is "we"? 9 A. I spoke on behalf of Chrysler. 10 Q. Chrysler Group has found? 11 A. Chrysler Group. 12 Q. So, once again, you're just repeating what 13 people have told you? 14 A. Yes, which is, unfortunately, comes with 15 my role as CEO of the group, yes. 16 Q. Like you swore in your affidavit on 17 July 7, 2014, you haven't done any of this 18 investigation yourself, have you? 19 A. I have not done any of the statistical 20 analysis or interpretation of the data. 21 Q. So let me ask my question again. 22 Would you agree with me that if the 23 midship gas tank location is safer, the automaker 24 has a duty to tell the people that? 25 MS. OWENS: Objection to the form of the	Page 77 1 Q. Are you aware that Chrysler Group -- 2 Chrysler Group claims there are no documents at all 3 where safety is even mentioned as a reason that the 4 gas tank was moved away from the rear for the Grand 5 Cherokee? 6 MS. OWENS: Objection to the form of the 7 question. 8 A. I wasn't aware of what you just said. 9 BY MR. BUTLER: 10 Q. Was not? 11 A. I am not aware. 12 Q. Do you find that to be believable? 13 MS. OWENS: Objection to the form of the 14 question. 15 A. If it came from Chrysler, the answer is 16 yes. 17 BY MR. BUTLER: 18 Q. How long have you been in the automotive 19 business? 20 A. 11 years; 12 to be exact. 21 Q. Well, are you familiar with John Olson who 22 is Chrysler's expert design engineer in this case? 23 A. No. 24 Q. Have you read his deposition? 25 A. No.

Page 78 1 Q. Would you agree that moving a gas tank on 2 a vehicle from the very back of the vehicle to a 3 midship's location is a major design change? 4 A. No. 5 Q. Before you told the American people that 6 these rear gas tanks were, quote, "absolutely safe," 7 close quote, did you ask anyone the question: Then 8 why did we move the gas tank away from the rear? 9 A. No. 10 Q. When did Fiat last sell a passenger car 11 with a rear gasoline tank? 12 A. I do not know. 13 Q. Does Fiat sell any passenger cars now with 14 a rear gasoline tank? 15 A. I do not know. 16 Q. When did you become CEO of Fiat? 17 A. June 1st, 2004. 18 Q. In the last ten-and-a-half years as CEO of 19 Fiat, have you seen any Fiat passenger cars that had 20 a gasoline tank in the rear behind the axle? 21 A. I may have. 22 Q. Do you recall any? 23 A. If it was, it was in either Latin America 24 or in India. 25 Q. Do you recall seeing any, is my first	Page 80 1 you may be right. 2 Q. I've read a bunch of articles about you. 3 I thought you were a car guy, you were involved in 4 the design of cars. 5 A. No, I'm not. I'm not an engineer. 6 Q. Do you know whether or not Fiat is selling 7 any car or passenger cars in this country that have 8 gasoline tanks at the rear? 9 A. Fiat as Fiat? 10 Q. Yeah. 11 A. Or Fiat as Chrysler? 12 Q. Fiat as Fiat. 13 A. To the best of my knowledge, not. 14 Q. We already -- we've already established 15 that with Chrysler. 16 Will you agree that if the rear gas tank 17 on a car is, quote, "vulnerable to rear impact," 18 close quote, that is anything but absolutely safe? 19 MS. OWENS: Objection to the form of the 20 question. 21 A. No, I disagree. 22 BY MR. BUTLER: 23 Q. Will you agree that if the rear gas tank 24 on a car is, quote, "vulnerable to rear impact," 25 that is dangerous?
Page 79 1 question? 2 A. No. 3 Q. Do you think that maybe Fiat is selling 4 passenger cars with rear gas tanks in Latin America 5 or India? 6 A. I don't know. 7 Q. Well, you mentioned that. There must be 8 some reason you mentioned it. 9 A. I said it's the only places where that 10 could have in fact have happened. I don't know. 11 Q. Why are those the only places where that 12 could have happened? 13 A. Simply because of the way in which the 14 portfolio is developed in Latin America 15 historically. 16 Q. What does that mean? 17 A. It's based on a standard architecture that 18 has been there for a long period of time. 19 Q. Isn't it true, sir, that Fiat sells no 20 cars with rear -- no passenger cars with rear 21 gasoline tanks? 22 A. I have no way of disagreeing with what you 23 said. 24 Q. Well, can you agree with it? 25 A. I have no way of knowing, so I can't --	Page 81 1 MS. OWENS: Objection to the form of the 2 question. 3 A. No, I don't agree. 4 BY MR. BUTLER: 5 Q. Will you agree that if the rear gas tank 6 on a car is, quote, "vulnerable to rear impact," the 7 automaker has a duty to fix that? 8 MS. OWENS: Objection to the form of the 9 question. 10 A. No, I don't. 11 BY MR. BUTLER: 12 Q. Will you agree that if the rear gas tank 13 on a car is, quote, "vulnerable to rear impact," the 14 automaker has a duty to warn people about that? 15 MS. OWENS: Objection to the form of the 16 question. 17 A. No, I don't. And I think I have tried to 18 explain that we do carry out extensive analysis to 19 determine whether effectively that we have what I 20 consider to be design defects or flaws in our 21 vehicles, and we carry out that analysis pretty 22 thoroughly and pretty extensively. 23 And our analysis suggested there has 24 been -- there is no defect, and it's a conclusion 25 that has been shared with NHTSA and with which NHTSA

Page 82 1 has agreed. 2 MR. BUTLER: Move to strike as 3 nonresponsive. 4 BY MR. BUTLER: 5 Q. And, again, sir, we're going to get to 6 your deal with NHTSA, believe me. 7 MS. OWENS: Move to strike the colloquy. 8 BY MR. BUTLER: 9 Q. Will you agree that if Chrysler knew that 10 the gas tank on the 1999 Grand Cherokee would be 11 crushed in -- would be crushed in rear impacts, that 12 is anything but, quote, "absolutely safe," close 13 quote? 14 MS. OWENS: Objection to the form of the 15 question. 16 A. I disagree. 17 BY MR. BUTLER: 18 Q. Do you deny that Chrysler knew that the 19 gas tank on the 1999 Grand Cherokee would be crushed 20 in rear impacts? 21 MS. OWENS: Objection to the form of the 22 question. 23 A. I don't -- I don't know how to answer your 24 question. There certainly was information within 25 Chrysler that looked at these events and tried to	Page 84 1 tank will be crushed in rear impacts, then that 2 means that car has a safety-related defect? 3 A. No. 4 MS. OWENS: Object to the form of the 5 question. 6 BY MR. BUTLER: 7 Q. That also mean -- will you agree that 8 means that car is dangerous? 9 A. No. 10 MS. OWENS: Same objection. 11 BY MR. BUTLER: 12 Q. Will you agree that means that car 13 presents an unreasonable risk of injury or death to 14 occupants? 15 A. No. And, effectively, the rules that were 16 put in place by NHTSA in connection with fuel 17 systems did not reflect any of what you said. 18 MR. BUTLER: Move to strike the latter 19 part as not responsive. 20 BY MR. BUTLER: 21 Q. Did you know that Mr. Estes' job at 22 Chrysler for the last 16 years has been, quote, 23 "problem solving," close quote? 24 A. We have a number of problem solvers inside 25 Chrysler, but I did not know that he had that
Page 83 1 understand them in the context of how the overall 2 population of cars or SUVs on the market would have 3 performed. 4 MR. BUTLER: Move to strike the latter 5 part as not responsive. 6 BY MR. BUTLER: 7 Q. You told us that you don't know who 8 Mr. Estes is, and you hadn't read his deposition. 9 Has anybody told you what he said about that? 10 MS. OWENS: Object to the form of the 11 question. 12 A. No. 13 BY MR. BUTLER: 14 Q. Has anybody told you that Chrysler 15 engineer Judson Estes testified under oath on 16 December 10, 2014, that Chrysler knew the gas tank 17 on the 1999 Grand Cherokee would be crushed in rear 18 impacts? 19 MS. OWENS: Objection to the form of the 20 question. 21 A. No. 22 BY MR. BUTLER: 23 Q. Will you agree that if the rear gas tank 24 on a car is vulnerable to rear impact, and is in a 25 known crush zone, and the automaker knows the gas	Page 85 1 specific role. 2 Q. Did you know that he's supposed to be in 3 Italy now? 4 A. On business, or on vacation? 5 Q. Did you know that Mr. Estes is supposed to 6 be in Italy having been transferred from Chrysler 7 Group to Fiat? 8 A. Doesn't make much of a difference now. 9 It's all part of one large entity, but... 10 Q. Did you know that? 11 A. I didn't even know who Mr. Estes was. I 12 told you that this morning. 13 Q. So you know nothing about Mr. Estes? 14 A. No; nor of his travel plans or where he 15 is. 16 Q. Would you agree with me, sir, that if an 17 automaker can design a vehicle so the gas tank at 18 the rear is not -- strike that. 19 Would you agree with me, sir, that if an 20 automaker can design a vehicle so the gas tank is 21 not vulnerable to rear impact, then the automaker 22 has a duty to do so? 23 MS. OWENS: Objection to the form -- 24 A. No. 25 MS. OWENS: -- of the question.

Page 86 1 BY MR. BUTLER: 2 Q. Would you agree with me, sir, that the one 3 and only crash test at 50 miles an hour that 4 Chrysler ever did on a Grand Cherokee with a rear 5 gas tank proves that Chrysler knew that gas tank 6 would be crushed in rear impacts? 7 MS. OWENS: Objection to the form of the 8 question. 9 A. I do not know. 10 BY MR. BUTLER: 11 Q. Have you read the crash test report for 12 the crash test run by Chrysler on November 18, 1999? 13 A. No, I have not. 14 Q. Have you talked to anybody about that? 15 A. No, I don't -- I haven't. 16 Q. Have you seen it? 17 A. No. 18 Q. So you told the American people on more 19 than one occasion that these Jeeps with rear gas 20 tanks are, quote, "absolutely safe," close quote, 21 but you never even read or knew about the only crash 22 test where a Chrysler hit the back of one of these 23 Jeeps at 50 miles an hour; is that right? 24 A. True, we -- that was not -- that is not 25 the proper definition of what we consider to be	Page 88 1 A. That's exactly why NHTSA set up 2 regulations to try and deal with positions of fuel 3 systems and so on. 4 MR. BUTLER: Move to strike as 5 nonresponsive. 6 BY MR. BUTLER: 7 Q. Let me repeat my question. 8 Isn't that why automakers, including 9 Chrysler, have tested cars to rear impacts at 10 50-miles-per-hour speeds because they know that's 11 going to happen in the real world? 12 MS. OWENS: Same objection. 13 A. I'm not sure how to answer that question, 14 but I would assume that's probably true. 15 (Plaintiffs' Exhibit #15-A marked) 16 BY MR. BUTLER: 17 Q. Let me show you the crash test I'm talking 18 about. Let me show you Plaintiffs' Exhibit 19 No. 15-A. 20 Now, this is a safety test vehicle crash 21 test letter. And you see at the top, it says, 22 "produced Subject to Protective Order, Walden versus 23 Chrysler Group, LLC." 24 Do you see that? 25 A. Yes. Sorry. Yeah.
Page 87 1 safety. 2 Q. Would you agree with me that cars get hit 3 in the rear in real world wrecks all the time? 4 A. I have no idea, but I would assume they 5 happen with some frequency, yes. 6 Q. Would you agree with me that cars get hit 7 in the rear at 50 miles an hour -- 8 A. I have no -- 9 Q. -- with some frequency? 10 A. I have no idea. 11 Q. Would you agree with me that a car getting 12 hit in the rear at 50 miles an hour out there on the 13 roads is foreseeable to automakers? 14 MS. OWENS: Objection to the form of the 15 question. 16 A. I think we -- all automakers, including 17 Chrysler, will think that's a possible event. I 18 don't know how likely it is, but it's possible. 19 BY MR. BUTLER: 20 Q. All right. Well, isn't that why 21 automakers, including Chrysler, have tested cars to 22 rear impacts at 50-mile-an-hour speeds because they 23 know it's going to happen? 24 MS. OWENS: Objection to the form of the 25 question.	Page 89 1 Q. The test date is November 18, 1999; 2 correct? 3 A. Yeah, I'm looking for the date. Yeah, 4 yeah, the 11 -- yeah. 5 Q. I think I have highlighted what I was 6 going to ask you about -- 7 A. Yeah. 8 Q. -- to save us time. 9 A. The printing is a bit bizarre, but anyway, 10 yes. 11 Q. The target speed is 50.1 miles per hour; 12 correct? 13 A. Yeah. 14 Q. Isn't it true that for this crash test at 15 50 miles an hour Chrysler put a cage around the gas 16 tank to reinforce it and put in a steel bumper beam 17 between the gas tank and the rear of the car? 18 A. I have no way of knowing. 19 Q. Well, I have highlighted it for you. Look 20 under Build Condition. 21 A. No, I can tell; but we're trying to 22 decipher the English that's written here. 23 Q. Well, do you see under Build Condition -- 24 A. No, I understand, but it's called the 25 "structural mule," which is not a production car.

Page 90 1 Q. Well, I think we can stipulate -- you may 2 know this. Do you know that what Chrysler was doing 3 in this test was trying to reinforce the rear gas 4 tank to see if that would be enough to still use a 5 rear gas tank for the 2005 model year Grand 6 Cherokee, which was to be the next generation 7 vehicle? Did you know that? 8 A. I have no idea. 9 Q. Okay. Did you know that after this test 10 Chrysler decided, well, for the next generation 11 Grand Cherokee we're not going to put the tank at 12 the rear, we'll put it midship? Do you know that? 13 A. The only thing I know is that it wasn't in 14 the back anymore in 2005. That's all I know. I 15 don't know any of the -- 16 Q. Did you know that decision was made after 17 this crash test? 18 A. No, I did not. 19 Q. All right. Now, back to my original 20 question. 21 Look under Build Condition, first bullet 22 point. Doesn't it say, quote, "structural cage to 23 represent '04 model year concept," close quote? 24 A. Yeah. 25 Q. And doesn't it talk about two different	Page 92 1 Q. Yes, sir. 2 Isn't it true that Chrysler never warned 3 anybody that for a 50-mile-an-hour rear crash 4 Chrysler had concluded the gas tank had to be 5 reinforced with a cage and a steel bumper beam? 6 MS. OWENS: Objection to the form of the 7 question. 8 A. I don't think that that was Chrysler's 9 belief at the time, but it's -- I have no way of 10 knowing. 11 BY MR. BUTLER: 12 Q. Isn't it true that Chrysler Group has 13 never warned anybody that the engineers at Chrysler 14 concluded that before they hit the back of a 1999 15 Grand Cherokee at 50 miles an hour, they had to put 16 a cage around the gas tank and a steel bumper beam 17 behind the gas tank to protect it? 18 MS. OWENS: Objection to the form of the 19 question. 20 A. I don't think there was an obligation to 21 do any of that. 22 BY MR. BUTLER: 23 Q. My question, sir, wasn't whether there was 24 an obligation to do any of that. My -- because 25 that, in fact, happened.
Page 91 1 bracket reinforcements to the gas tank? 2 A. That's what it says. 3 Q. And then it says, "KJ body rear bumper 4 beam installed." 5 Do you see that? 6 A. Yeah. 7 Q. And then on the next page you've actually 8 got a picture of what Chrysler did to the 19- -- to 9 the 1999 Grand Cherokee before -- rear gas tank 10 before they hit it at 50 miles an hour. 11 MS. OWENS: Objection. 12 BY MR. BUTLER: 13 Q. You see that, don't you? 14 MS. OWENS: Objection to the form of the 15 question. 16 A. I guess. I don't know. 17 BY MR. BUTLER: 18 Q. Well, don't you see that steel cage around 19 the gas tank? 20 A. I see a steel cage, yes. 21 Q. It's in green? 22 A. No, I can tell the green, yes. 23 Q. And you see that what they called a rear 24 bumper beam in red, don't you? 25 A. That's what it looks like.	Page 93 1 My question is, isn't it true that 2 Chrysler Group has never warned anybody that the 3 engineers at Chrysler concluded that before they hit 4 the back of a 1999 Grand Cherokee at 50 miles per 5 hour, they were going to put a cage around the tank 6 and a steel bumper beam to protect it? 7 A. No. 8 MS. OWENS: Objection to the form of the 9 question. 10 A. But I can -- if I can just explain. There 11 are a number of tests that get carried out by the 12 Safety Office, and there are a number of structural 13 mules that are created as a car is built, and I can 14 tell you this on current production models. This is 15 not indicative of any solution that would ultimately 16 be adopted by anybody in the construction of 17 mass-produced cars. 18 MR. BUTLER: Move to strike the -- 19 A. It is one -- it is one of the things that 20 happens within the development cycle. 21 MR. BUTLER: Move to strike the latter 22 part as nonresponsive. 23 BY MR. BUTLER: 24 Q. Isn't it true that Chrysler Group never 25 sold a Grand Cherokee with those reinforcements?

Page 94 1 A. I have no way of knowing. 2 Q. Isn't it true that Chrysler -- strike 3 that. 4 Isn't it true that the Waldens' 1999 Grand 5 Cherokee had none of those safety features? 6 A. I have no way of knowing that. 7 Q. Isn't it true that the only protection the 8 gas tank on the Waldens' 1999 Grand Cherokee had 9 from rear impact was a strip of plastic and some 10 Styrofoam? 11 MS. OWENS: Objection to the form of the 12 question. 13 A. I have no way of knowing. 14 (Plaintiffs' Exhibit #3 marked) 15 BY MR. BUTLER: 16 Q. Show you Plaintiffs' Exhibit No. 3. 17 Have you seen that photograph before? 18 A. No, I have not. 19 Q. Do you recognize that as the rear of a 20 1999 Grand Cherokee with the fascia -- the plastic 21 fascia trim removed? 22 A. It's possible, yes. 23 Q. Do you see the fuel tank -- the gas tank 24 down there? 25 A. Yes, I do.	Page 96 1 A. Yes. 2 Q. And Chrysler appears to have claimed that 3 because other automakers put gas tanks at the rear 4 that it was okay for Chrysler to do it. Are you 5 familiar with that argument? 6 A. Yes. 7 Q. Isn't that just like a kid telling his 8 mama, "All the other kids were doing it, so it was 9 okay"? 10 MS. OWENS: Objection to the form of the 11 question. 12 A. I'm not sure I understand the parallel, 13 but... 14 BY MR. BUTLER: 15 Q. That argument is not true, is it? 16 MS. OWENS: Objection to the form of the 17 question. 18 A. I don't know whether it's not true. I 19 think it is accurate in the sense that it reflects a 20 fact that all automakers were adopting particular 21 solutions in the building of cars, which were 22 supported, approved, and in conformity with the 23 existing regulations in the United States, and that 24 the performance of our vehicles compared to the 25 overall class was not distinguishably different,
Page 95 1 Q. Does that gas tank look like it's 2 adequately protected to you? 3 MS. OWENS: Objection to the form of the 4 question. 5 A. I have no way of expressing a view on 6 this. 7 BY MR. BUTLER: 8 Q. Isn't it obvious, sir, that a piece of 9 plastic trim and Styrofoam is no protection at all 10 for this Grand Cherokee in rear impact? 11 MS. OWENS: Objection to the form of the 12 question. 13 A. I have no way of knowing. 14 BY MR. BUTLER: 15 Q. Isn't it obvious, sir, that a piece of 16 plastic trim and some Styrofoam is especially no 17 protection at all for this Grand Cherokee when it's 18 hit in the rear in an underride wreck? 19 MS. OWENS: Objection to the form of the 20 question. 21 A. I have no way of knowing. 22 BY MR. BUTLER: 23 Q. Now, Chrysler has asserted in this case 24 that other automakers were also putting gas tanks at 25 the rear. Were you aware of that?	Page 97 1 and, therefore, there was no safety issue in 2 connection with these cars. 3 And it's a position that was detailed and 4 explained in -- pretty carefully to NHTSA. NHTSA 5 ultimately agreed with our conclusion. 6 MR. BUTLER: Move to strike the latter 7 part as nonresponsive. 8 BY MR. BUTLER: 9 Q. Sir, isn't it true that by 1999, even for 10 just SUV cars, the overwhelming majority of 11 automakers had moved the gas tanks away from the 12 rear and put them in the midship's location? 13 A. I have no way of knowing. 14 Q. Have you seen the tank road map document 15 that Chrysler Group itself produced to us in this 16 case? 17 A. No, I have not. 18 Q. Were you aware that even as of 1999 19 something like 31 SUVs manufactured and sold in this 20 country had midship's gas tanks, and only five had 21 rear gas tanks? 22 A. No, I do not know. 23 Q. Isn't it true that in the letter from the 24 Office of Defects Investigation, ODI said that -- 25 ODI -- you understand ODI means Office of Defects

Page 98 1 Investigation? 2 A. Yes. 3 Q. Isn't it true that ODI had done a survey 4 for the 2002-2003 model cars, not just limited to 5 SUVs, but including SUVs, pickup trucks, minivans, 6 full-size vans and passenger cars, and had found -- 7 this is on Page 3, the same paragraph -- had found 8 that 65 vehicles had fuel tanks located ahead of the 9 rear axle; six vehicles had fuel tanks over the rear 10 axle; and only four vehicles had tanks located 11 behind the rear axle? Isn't that what they found? 12 A. That's what it says. 13 Q. Do you disagree with that conclusion? 14 A. I have no way of disagreeing. 15 Q. Now, of the four vehicles that ODI had 16 found that had rear gas tanks, isn't it true that 17 only two of them were SUVs whose gas tanks were 18 higher off the ground than passenger cars -- 19 MS. OWENS: Objection to the form of the 20 question. 21 BY MR. BUTLER: 22 Q. -- regular passenger cars? 23 A. I would assume based on my knowledge of 24 the Mustang and the Grand Marquis, I would assume, 25 yes.	Page 100 1 cars, sedans or coupes? 2 A. I don't have the statistical information 3 to back up your assertion. 4 Q. Well, if one of these Jeeps with a gas 5 tank in the rear, like is depicted on Plaintiffs' 6 Exhibit No. 3 -- and I'll ask the videographer to 7 look at that -- if one of these Jeeps with the rear 8 higher up off the ground and the gas tank hanging 9 down below the rear gets hit by a Chevrolet Impala 10 in the rear, isn't it likely that the striking car 11 is going to hit right into the gas tank? 12 A. I don't know the Chevrolet Impala. 13 Q. Isn't it more dangerous? 14 A. That's not a car I manufacture. 15 Q. Isn't it more dangerous if the striking 16 car in a rear impact actually hits the gas tank? 17 MS. OWENS: Objection to the form of the 18 question. 19 A. No way of knowing. 20 BY MR. BUTLER: 21 Q. Have you seen pictures of the gas tank on 22 the Waldens' 1999 Grand Cherokee taken after this 23 wreck occurred? 24 A. No, I have not. 25 Q. Did you know that the gas tank -- the rear
Page 99 1 Q. And those two were the Jeep Grand Cherokee 2 and the Jeep Liberty; correct? 3 A. Correct. 4 Q. Okay. Do you agree with the Office of 5 Defects Investigation that the height of the gas 6 tank off the ground is important? 7 A. For SUVs in general, yes. 8 Q. Well, the height -- if an SUV has a rear 9 gas tank, the fact that the gas tank is higher off 10 the ground is important with respect to the danger 11 that SUV might pose in rear impacts; do you agree? 12 A. I have no -- 13 MS. OWENS: Objection to the form of the 14 question. 15 A. I have no way of knowing. 16 BY MR. BUTLER: 17 Q. Well, isn't it merely logical that if the 18 back of the vehicle is higher off the ground and the 19 gas tank is in the back, then there is greater 20 danger of an underride collision? 21 MS. OWENS: Objection to the form of the 22 question. 23 A. I have no way of knowing. 24 BY MR. BUTLER: 25 Q. Aren't most vehicles on the road passenger	Page 101 1 gas tank on the Waldens' Grand Cherokee was crushed 2 up against the axle? 3 A. No, I did not know that. 4 Q. Did you know that the axle didn't move, 5 did not move? 6 A. Did not know that. 7 Q. Did you know that the area under the 8 Waldens' Grand Cherokee where a midship's gas tank 9 could have been located was undamaged? 10 A. No, did not know that. 11 Q. Did you know that Chrysler Group has 12 admitted in this case that it could have put the gas 13 tank on the Waldens' 1999 Grand Cherokee in the 14 midship's position? 15 A. I'm not aware of that. 16 Q. Isn't it true, sir, that there was a time 17 in the distant past prior to the 1970s where a lot 18 of cars had gas tanks located in the rear, but 19 automakers started moving them after the Pinto 20 controversy? 21 MS. OWENS: Objection to the form of the 22 question. 23 A. That's a long, long time ago. I don't 24 have any recollection. 25 BY MR. BUTLER:

Page 102 1 Q. Have you read anything about that? 2 A. No, not on -- not lately. 3 Q. Well, you said several times today things 4 to the effect that other automakers were using rear 5 gas tanks. Have you done any study of the history 6 of gas tank location on cars in the United States? 7 A. No, I have not. 8 Q. Okay. Well, then I gather that you would 9 not be able to disagree with the conclusions of the 10 professional engineers at the Office of Defects 11 Investigation who wrote on Page 5 of the June 3, 12 2013 letter that after Pinto, manufacturers began to 13 adopt designs in which fuel tanks were located in 14 less vulnerable locations than behind the rear axle. 15 You can't disagree with that, can you? 16 A. No. But I think we've answered that 17 statement in the white paper that was issued by 18 Chrysler after the issuance of this letter. 19 Q. Isn't it true -- well, strike that. 20 I guess it's also true that since you 21 haven't researched it yourself, you cannot disagree 22 with the conclusion that the Office of Defects 23 Investigation wrote about on Page 3 of their June 3, 24 2013, letter that Chrysler's decision to place the 25 Grand Cherokee and first generation Liberty fuel	Page 104 1 benefits of placing the tank in front of the rear 2 axle," close quote? Do you disagree with that? 3 A. I have no way of knowing. 4 Q. You did read the letter? 5 A. Yeah. But, Mr. Butler, this letter was 6 answered in detail by -- by Chrysler. You make 7 reference to this letter as being the definitive 8 view of the assessment of the technical office. 9 And I think that NHTSA has also been 10 absolutely clear that the vehicle that we're 11 speaking about here was not -- didn't require any 12 adjustments, that it was effectively full -- fully 13 in conformity with the existing regulations, and it 14 performed exactly like all other vehicles in its 15 class did in the marketplace. And this is on the 16 record with NHTSA. 17 MR. BUTLER: Move to strike as 18 nonresponsive. 19 BY MR. BUTLER: 20 Q. "Performed exactly like all other 21 vehicles." You know, sir, don't you, that's a false 22 statement? 23 A. If you can give me access to the white 24 paper, I can make reference to a graph that has 25 been --
Page 103 1 tanks aft of the rear axle contravene the industry 2 trends as well as Chrysler's practices in non-Jeep 3 vehicles to place fuel tanks in less vulnerable 4 locations. 5 You can't disagree with that either, can 6 you? 7 MS. OWENS: Object to the form of the 8 question. 9 A. Where are you reading from? 10 MS. OWENS: (Indicating). 11 BY MR. BUTLER: 12 Q. Last paragraph. 13 A. I have no way of disagreeing or agreeing. 14 But I think we've answered the statement with the 15 white paper that Chrysler issued. 16 Q. Isn't it true, sir, that Chrysler was 17 certainly aware of the safety benefits of placing 18 the tank in front of the rear axle before it put gas 19 tanks on these Jeeps behind the rear axle? 20 A. I have no way of knowing that. 21 Q. Can you disagree with the conclusion 22 reached by the engineers at the Office of Defects 23 Investigation and stated on Page 2 of this letter, 24 the last paragraph, second sentence, which reads, 25 quote, "Chrysler was certainly aware of the safety	Page 105 1 THE WITNESS: Do we have a copy of the 2 white paper here? 3 MS. OWENS: Just... 4 BY MR. BUTLER: 5 Q. Sir, Chrysler may -- Chrysler Group may 6 contend that it performed like other vehicles, but 7 the Office of Defects Investigation concluded that 8 that contention was fraud -- false, did they not? 9 MS. OWENS: Objection to the form of the 10 question. 11 BY MR. BUTLER: 12 Q. Let me restate that. 13 Chrysler Group may contend that the Jeeps 14 with rear gas tanks performed like other vehicles, 15 but isn't it true that the Office of Defects 16 Investigation rejected that contention? 17 A. That is not true in connection with the 18 Grand Cherokee from this particular year. I think 19 NHTSA was absolutely clear that it exempted that car 20 from any type of treatment. They considered it to 21 be absolutely safe. 22 MR. BUTLER: Move to strike as 23 nonresponsive. 24 BY MR. BUTLER: 25 Q. Back to my question.

Page 106 1 When the engineers at ODI wrote, quote, 2 "Chrysler was certainly aware of the safety benefits 3 of placing the tank in front of the rear axle," they 4 quoted a Chrysler document, didn't they? 5 A. But Mr. Butler, you need to tell me what 6 page you're reading from. 7 Q. Same page, Page 2. 8 A. Yeah. But you didn't tell me. Please 9 tell me. 10 Q. All right. Let me -- I'll strike my 11 question and do it over again. 12 A. Sure. 13 Q. When the engineers at ODI wrote on Page 2, 14 the last paragraph, second sentence -- 15 A. Yeah. 16 Q. -- quote: "Chrysler was certainly aware 17 of the safety benefits of placing the tank in front 18 of the rear axle," close quote, they cited to a 19 Chrysler document, did they not? 20 A. They may have. There was an internal 21 memorandum, apparently, according to this. 22 Q. They cited to an August 24, 1978, Chrysler 23 internal memorandum written by Chrysler engineer 24 L. L. Baker; correct? 25 A. That's what it says.	Page 108 1 Q. Pardon? 2 A. I think it has. I don't know. I don't 3 remember exactly. 4 Q. Look at Page 8. 5 A. Yeah. All right. 6 Q. I think it's Page 8. 7 A. Yeah. 8 Q. Don't you recognize that as a photograph 9 of Remi Walden's Jeep on fire? 10 A. Now that I've seen the other picture, yes, 11 I do. 12 Q. To your knowledge, has Chrysler, or 13 Chrysler Group, ever defended a case in an actual 14 trial where a Jeep with rear gas tanks got hit in 15 the rear causing a fire and burn injuries or death? 16 A. I do not know. 17 Q. Have you asked? 18 A. No, I have not. 19 Q. Sir, isn't it probable that if the gas 20 tank in the Waldens' 1999 Grand Cherokee had been in 21 the midship's location, there would have been no 22 fire? 23 A. I have no -- 24 MS. OWENS: Objection to the form of the 25 question.
Page 107 1 Q. Okay. 1978 was 37 years ago, was it not? 2 A. Thereabouts. 3 Q. Sir, isn't it just plain old common sense 4 that 11 inches from the back of the car -- of a car 5 is not a safe place to put a tank full of gasoline? 6 A. I have -- 7 MS. OWENS: Objection to the form of the 8 question. 9 A. -- no way of knowing. 10 BY MR. BUTLER: 11 Q. Sir, isn't it just plain old common sense 12 that in front of the rear axle in the midship's 13 location is a much safer place for a tank full of 14 gasoline? 15 MS. OWENS: Object to the form. 16 A. I have no way of knowing. 17 BY MR. BUTLER: 18 Q. Isn't it true that the Office of Defects 19 Investigation cited this wreck in which Remi Walden 20 died as an example of what's wrong with Jeeps with 21 rear gas tanks? 22 MS. OWENS: Objection to the form of the 23 question. 24 A. Yes. 25 BY MR. BUTLER:	Page 109 1 A. I have no way of knowing. 2 BY MR. BUTLER: 3 Q. Isn't it true, sir, that if there had been 4 no fire, Remi Walden would not have died on March 6, 5 2012? 6 MS. OWENS: Objection to the form of the 7 question. 8 A. It seems logical to me, but I don't have 9 the facts. 10 BY MR. BUTLER: 11 Q. Let's talk about this NHTSA issue now. 12 MR. BUTLER: Go off the video just a 13 moment. Let me get my files in order. 14 THE VIDEOGRAPHER: And we are off the 15 video. 16 (Off video record.) 17 THE VIDEOGRAPHER: And we are back on 18 video. The time is 11:24. 19 BY MR. BUTLER: 20 Q. Sir, from whom did you learn in May of 21 2013 that a recall request was a possibility? 22 A. From Mark Chernoby and Doug Betts. 23 Q. Where did they learn it? 24 A. I have no idea. I would assume from 25 either direct interfaces with NHTSA, or from people

Page 110 1 who had a direct interface with NHTSA. 2 Q. How did you learn about that? 3 A. They came into my office and told me. 4 Q. Where? 5 A. In Detroit, in Auburn Hills. 6 (Plaintiffs' Exhibit #54 marked) 7 BY MR. BUTLER: 8 Q. I'll show you Plaintiffs' Exhibit No. 54. 9 Do you recognize that place? 10 A. To be honest, no. 11 Q. Have you ever been there before? 12 A. I -- if I don't recognize it, it's kind of 13 hard for me to tell what it is. 14 Q. Well, let me help you out. I'll get a 15 close-up. 16 A. Good. 17 (Plaintiffs' Exhibit #55 marked) 18 BY MR. BUTLER: 19 Q. Plaintiffs' Exhibit No. 55. 20 Does this help refresh your recollection? 21 Do you recognize it now? 22 A. No. 23 Q. Well, I'll keep trying. 24 A. Keep on showing me pictures, I might get 25 better.	Page 112 1 A. I may even have been given a copy, but... 2 Q. Well, were you told verbally, or was this 3 e-mail chain forwarded to you? 4 A. It could have been forwarded to me. I 5 could have been told on the phone. 6 Q. Do you have any e-mails about this meeting 7 you had in Chicago on June 10, 2013? 8 A. I don't know. 9 Q. Have you looked? 10 A. No, I have not. 11 Q. Has anybody asked you to look? 12 A. No. 13 Q. You use e-mails a lot, don't you? 14 A. I use some, yes. 15 Q. Well, I read in one article, I have got it 16 here somewhere, that you and Mr. Elkann -- is that 17 how you pronounce his name? 18 A. Yes. 19 Q. Pardon? 20 A. Yes. 21 Q. Elkann, he's chairman of Fiat? 22 A. Yes, he is. 23 Q. That you and Mr. Elkann exchange dozens of 24 text messages and e-mails every day? 25 A. I don't think we ever used the term
Page 111 1 Q. Yep. 2 (Plaintiffs' Exhibit #56 marked) 3 BY MR. BUTLER: 4 Q. Show you Plaintiffs' Exhibit No. 56. 5 Does that help refresh your recollection 6 and help you remember that building? 7 A. That is probably more like it, yes. 8 Q. Do you remember going to that building? 9 A. I remember going to a building like this, 10 yes. 11 Q. You were there on June 10, 2013, were you 12 not? 13 A. It sounds right. 14 (Plaintiffs' Exhibit #57 marked) 15 BY MR. BUTLER: 16 Q. Well, let me show you Plaintiffs' Exhibit 17 No. 57. 18 A. Okay. 19 Q. Have you seen this document before? 20 A. No, because it was addressed to Jody, I 21 think. 22 Q. Nobody showed you that before? 23 A. No. I think I was told about the contents 24 of this document here. 25 Q. Told?	Page 113 1 "e-mails," but anyway. 2 Q. Text messages? 3 A. Yes -- 4 Q. All right. 5 A. -- which is not an e-mail. 6 Q. Do you have any text messages about this 7 meeting that occurred in Chicago on June 10, 2013? 8 A. To the best of my recollection not. 9 Q. Has anybody asked you to look for any? 10 A. No. 11 Q. So back to my question about this 12 Plaintiffs' Exhibit No. 57, did anybody ever forward 13 this e-mail chain to you? 14 A. They could have. I don't remember having 15 it. But it doesn't make any difference. I'm aware 16 of the meeting. 17 Q. Has anybody asked -- any of Chrysler 18 Group's lawyers asked you to check your e-mails to 19 see if you got these e-mails between Ms. Trapasso 20 and David Strickland? 21 MS. OWENS: Objection to the form of the 22 question, calls for attorney/client communications. 23 I instruct him not to answer. 24 BY MR. BUTLER: 25 Q. Has anybody -- are you going to answer the

Page 114 1 question? You're supposed to say "no." 2 A. No. 3 Q. Okay. Has anybody asked you to provide to 4 Chrysler Group's lawyers any e-mails that you had 5 about this meeting in Chicago on June 10, 2013? 6 MS. OWENS: To the extent it calls for 7 attorney/client communications, I will tell the 8 witness not to answer. If he can answer it by 9 referring to other communications from 10 non-attorneys, he may answer. 11 A. I may have -- I may have had an exchange 12 of e-mails about this with non-attorneys, and it 13 could have been Chernoby, it could have been 14 anybody, Doug Betts, Jody Trapasso. It could have 15 been anybody. 16 BY MR. BUTLER: 17 Q. Have you looked for them? 18 A. No, I have not. But even the change of 19 substance, I'm fully aware of the meeting. I'm... 20 Q. We're talking about two different things 21 right now. We're talking about documents, and I 22 want to talk about the meeting now. 23 The meeting took place at the FAA regional 24 office about a mile from Chicago O'Hare Airport; 25 right?	Page 116 1 the FAA. 2 Q. Did you have any business with the FAA? 3 A. To the best of my knowledge not. 4 Q. You were there at the FAA's government 5 offices on June 10, 2013, to meet with the 6 administrator of NHTSA David Strickland, and the 7 Secretary of the United States Department of 8 Transportation Ray LaHood; is that correct? 9 A. Correct. 10 Q. Mr. LaHood was Strickland's supervisor; 11 correct? 12 A. I have no idea what the relation -- the 13 reporting relationship is between the two. 14 Q. Secretary LaHood was a member of the 15 Cabinet of the United States; correct? 16 A. Yes. 17 Q. Both of these gentlemen were U. S. 18 Government officials; correct? 19 A. Yes, I guess. 20 Q. Their job was to work for the people of 21 this country; correct? 22 MS. OWENS: Objection to the form of the 23 question. 24 A. I -- I guess. 25 BY MR. BUTLER:
Page 115 1 A. Yeah. Yes. Yes. 2 Q. The location was arranged by David 3 Strickland; correct? 4 A. Yes, he did. 5 Q. David Strickland was then the 6 administrator of NHTSA; correct? 7 A. Yes, he was. 8 Q. He was the top guy at -- top person at 9 NHTSA; correct? 10 A. He was the head of NHTSA at the time. 11 Q. All right. The meeting on June 10th was 12 on a Monday; correct? 13 A. I don't know whether the -- that day was a 14 Monday. Yes, it does say here 4:00 p.m., Monday. 15 It must be Monday. 16 Q. Where did you come from to get to Chicago 17 for this meeting? 18 A. I flew in from Detroit. 19 Q. Pardon? 20 A. I flew in from Detroit, from Auburn Hills. 21 Q. Now, the place where this meeting was 22 held, the 2300 building, is a building owned by the 23 United States Government; correct? 24 A. Yes, it is. It looks that -- I have no 25 idea whether it's owned. It's certainly occupied by	Page 117 1 Q. Mr. Strickland flew in to Chicago to meet 2 with you from Washington, D. C., our nation's 3 capitol; correct? 4 A. I have no idea what his origin was that 5 day. 6 Q. You asked Mr. -- how do you pronounce her 7 name, Trapasso? 8 A. Trapasso. 9 Q. Trapasso. You asked Ms. Trapasso to 10 arrange this meeting; correct? 11 A. Correct. 12 Q. On June 6, 2013, Ms. Trapasso started 13 e-mailing Mr. Strickland to arrange a meeting with 14 you; correct? 15 A. Yes. 16 Q. They talked, that is Mr. Strickland, 17 Ms. Trapasso, that very night, June 6th; correct? 18 A. I don't know. 19 Q. Look at the e-mails, if you would, sir. 20 June 7, 2012, Jody's e-mail to Strickland. 21 MS. OWENS: What page? 22 MR. BUTLER: I didn't write down the page. 23 So it's back toward the back. 24 A. Yeah, it's on -- 25 BY MR. BUTLER:

Page 118 1 Q. June 7, 2013. 2 A. It's on Page 5. Yes, I read it, June 7th, 3 9:06 a.m. Eastern time. 4 Q. They talked that very night; correct, 5 June 6. 6 A. "Last night." 7 Q. Yeah. 8 A. June 6th; correct. 9 Q. June 6th was three days after the letter 10 from the Office of Defects Investigation to Chrysler 11 Group -- 12 A. Correct. 13 Q. -- correct? 14 A. I guess, yes. 15 Q. The letter is June 13? 16 A. Yeah. 17 MS. OWENS: June 3rd. 18 BY MR. BUTLER: 19 Q. June 3rd. I'm sorry. June 3rd? 20 A. Yeah. 21 Q. Three days later Ms. Trapasso is calling 22 the head guy at NHTSA to arrange a meeting with you; 23 correct? 24 A. Correct. 25 Q. Had you met with Strickland before about	Page 120 1 "Sergio," close quote? 2 A. Correct. 3 Q. Isn't it true that Secretary LaHood was 4 there at the June 10 meeting in Chicago only because 5 he, Secretary LaHood, asked to be there? 6 A. I have no idea. But I was told that he -- 7 that he wanted to be there, yes. 8 Q. Well, look at Exhibit 57 -- 9 A. Yes. 10 Q. -- Mr. Strickland's June 7 e-mail, 11 9:48 a.m. Isn't that what it says, that "the 12 Secretary wants to join us"? It's the top of 13 Page 5. 14 A. Okay. Yeah. 15 Q. Isn't that what it says? 16 A. That's what it says. 17 Q. Isn't it true that Mr. Trapasso told David 18 Strickland that you wanted the meeting to be just 19 the three of you, no one else there? 20 A. No, not really. 21 Q. Look at Exhibit No. 57, Strickland's 22 June 7, 10:31 a.m. e-mail. 23 A. What page? 24 Q. I'll look it up. Page 4. The second 25 e-mail on that page.
Page 119 1 this investigation? 2 A. No, to the best of my knowledge not. 3 Q. By the very next day, June 7, which was a 4 Friday, the meeting had been arranged for the next 5 business day on Monday, June 10th; correct? 6 A. Yeah. Yes. 7 Q. That's pretty quick service, isn't it? 8 A. Possible. 9 Q. Isn't it true that Mr. Strickland and 10 Ms. Trapasso exchanged 23 e-mails on June 6 and 11 June 7 to set up that meeting? 12 A. Yes. 13 Q. Isn't it true that those e-mails indicate 14 that Ms. Trapasso and Mr. Strickland were on a 15 first-name basis; she called him David, and he 16 called her Jody? 17 A. "She" who? I'm sorry. 18 Q. Ms. Trapasso? 19 A. It's a Mr. Trapasso. 20 Q. Jody is a Mr.? I'm sorry. 21 He called him David, and he called him 22 Jody? 23 A. Yes. 24 Q. Both Mr. Trapasso and Mr. Strickland 25 referred to you in those e-mails as, quote,	Page 121 1 A. Yes. 2 Q. David Strickland wrote to Mr. Trapasso 3 Friday, June 7, 10:31 a.m., quote, "The meeting 4 would only be with the Secretary and I, no other 5 staff, as Sergio wanted," close quote? 6 A. Yeah. And -- 7 Q. Did I read that correctly? 8 A. You read it correctly. If I can interpret 9 it for you, I was not bringing any technical people 10 with me to the meeting. It was me alone. So if 11 they wanted to bring an army of people, they were 12 welcome, but I was going to show up on my own. 13 MR. BUTLER: Move to strike that entire 14 answer as nonresponsive. 15 BY MR. BUTLER: 16 Q. Isn't it true that David Strickland on 17 Friday, June 7 at 10:31 a.m. e-mailed Mr. Trapasso 18 and said, quote, "The meeting would only be with the 19 secretary and I, no other staff, as Sergio wanted," 20 close quote? 21 A. That's what the e-mail says. 22 Q. All right. Did you tell Mr. Strickland 23 that's what you wanted? 24 A. I did not speak to Mr. Strickland. I 25 think it was Jody that did.

Page 122 1 Q. Then Mr. Trapasso -- then the only way -- 2 the only place Mr. Strickland could get that 3 understanding was through Mr. Trapasso; correct? 4 A. Correct. 5 Q. Did you tell Mr. Trapasso that you didn't 6 want any other staff there? 7 A. That I was not going to bring anybody else 8 at the meeting, yes. 9 Q. Did you tell Mr. Trapasso that you didn't 10 want any other staff there? 11 A. I could -- I would never tell NHTSA who to 12 bring to a meeting and who not to bring to a 13 meeting. I only told them that I would not be 14 bringing anybody from Chrysler. 15 Q. Well, were you surprised when you showed 16 up for this meeting and only Strickland and LaHood 17 were there for the government? 18 A. No, not at all. 19 Q. Now, after this meeting, didn't you have 20 four private telephone meetings with these two 21 gentlemen? 22 A. What's the difference between a private 23 and a non-private telephone meeting? 24 Q. Well, let me put it this way. After this 25 meeting occurred, didn't you have four telephone	Page 124 1 BY MR. BUTLER: 2 Q. Show the jury a document proving that the 3 press was told about this meeting in advance of the 4 meeting. 5 MS. OWENS: Objection to the form of the 6 question. 7 A. Was that a question? 8 BY MR. BUTLER: 9 Q. Yeah. 10 A. What was it? 11 Q. Do you have one? Do you have a document 12 proving that the press was told about this meeting 13 in advance of the meeting? 14 MS. OWENS: Objection to the form of the 15 question. 16 A. I -- the answer, I don't have one, and I 17 normally don't issue one when I meet government 18 officials. 19 BY MR. BUTLER: 20 Q. Show the jury a document proving that any 21 of the auto safety groups that had asked NHTSA to 22 investigate the Jeeps were informed about this 23 meeting before it occurred. 24 MS. OWENS: Objection to the form of the 25 question.
Page 123 1 conversations in which the only participants were 2 you, Strickland and LaHood? 3 A. Yeah, I don't know whether both of them 4 were on the phone on all three occasions. I think 5 it was three phone calls or maybe four. 6 Q. But nobody else was on the phone; right? 7 A. Nobody else was on the phone. 8 Q. Do you deny telling Trapasso to tell 9 Strickland that you wanted the meeting to be limited 10 to three people? 11 A. No. 12 Q. Mr. -- let me finish my question -- 13 Mr. Marchionne -- strike that. I mispronounced it. 14 Let me start over. 15 Do you deny that you told Mr. Trapasso 16 that you wanted the meeting limited to three people: 17 Mr. Marchionne, Mr. Strickland and Mr. LaHood; "yes" 18 or "no"? 19 A. No. 20 Q. Now, the meeting that you had with these 21 two U. S. government officials was not only private, 22 it was also secret, was it not? 23 MS. OWENS: Objection to the form of the 24 question. 25 A. No.	Page 125 1 A. I'm sorry. You told me to show the jury. 2 What jury? 3 BY MR. BUTLER: 4 Q. The jury that's going to be watching this 5 videotape, sir. 6 A. Oh, I see. 7 Q. Do you have a document that proves that 8 the auto safety groups that had asked NHTSA to 9 investigate these Jeeps were told about this meeting 10 in advance? 11 A. I have no -- no such thing. 12 Q. Did you ever instruct anybody to tell any 13 of the victims of these Jeeps with rear gas tanks 14 that you were going to have a private meeting with 15 two U. S. government officials about the NHTSA 16 investigation? 17 MS. OWENS: Objection to the form of the 18 question. 19 A. No. 20 BY MR. BUTLER: 21 Q. Was anything done by you or Chrysler Group 22 to inform the parents of Remington Walden that you, 23 the CEO of Fiat and Chrysler Group, were going to 24 have this meeting with two U. S. government 25 officials about the NHTSA investigation?

Page 126 1 A. No. 2 Q. Isn't it true that by June 10, 2013, the 3 lawsuit filed by the parents of Remington Walden had 4 been pending for almost a year? 5 A. I would not know that, but based on what 6 you've told me today, yes. 7 Q. The purpose of the meeting that you had 8 wanted to arrange -- that you arranged with these 9 two U. S. government officials was for you to try to 10 get them to resolve the NHTSA investigation with no 11 finding of defect; isn't that true? 12 MS. OWENS: Objection to the form of the 13 question. 14 A. The objective of the meeting was to try 15 and find a resolution to their June 3rd letter that 16 was acceptable to Chrysler and acceptable to NHTSA. 17 BY MR. BUTLER: 18 Q. Sir, that's not a true statement, is it? 19 MS. OWENS: Object to the form of the 20 question. 21 A. I'm sorry, but it is a true statement. 22 BY MR. BUTLER: 23 Q. Look at your affidavit, sir, that you 24 signed on July 7, 2014. 25 A. (Witness complies with request.)	Page 128 1 A. No, I was trying to resolve the issue. 2 The operative word of the statement on the 3 Paragraph 8 is that I was trying to find a 4 resolution to the issue between NHTSA and Chrysler. 5 Q. Isn't it true that you and LaHood and 6 Strickland cut a deal at that June 10, 2013, meeting 7 in Chicago? 8 A. Untrue. 9 MS. OWENS: Objection to the form of the 10 question. 11 A. Untrue. 12 BY MR. BUTLER: 13 Q. Isn't it true that you convinced them then 14 and there to resolve the NHTSA investigation without 15 a finding of defect? 16 MS. OWENS: Object to the form of the 17 question. 18 A. Untrue. 19 (Plaintiffs' Exhibit #61 marked) 20 BY MR. BUTLER: 21 Q. Show you Plaintiffs' Exhibit No. 61. 22 Have you seen that article before? 23 A. No. 24 Q. You're familiar with the magazine 25 Automotive News?
Page 127 1 Q. Look at the last page first. 2 A. Yeah. 3 Q. That is your signature? 4 A. It is my signature. 5 Q. And it says over there that a Notary 6 Public named Kerry L. Rodriguez signed it and 7 stamped it; correct? 8 A. Yeah. 9 Q. And it says that this affidavit was 10 "subscribed and sworn to before me on this 7 day of 11 July, 2014"; correct? 12 A. Yes. 13 Q. Is that correct? 14 A. (Nods head affirmatively). 15 Q. Look at Paragraph 8 of your July 7, 2014, 16 affidavit. 17 A. I've read it. 18 Q. Okay. Doesn't it say that: I wanted to 19 meet with Mr. LaHood and Mr. Strickland to discuss 20 the possibility of a resolution of the dispute that 21 had no finding of defect and the potential 22 parameters of such a resolution? 23 A. Yeah. 24 Q. Wasn't the purpose of your meeting with 25 them to avoid any finding of defect?	Page 129 1 A. Yes, I am. 2 Q. Okay. This is an Automotive News article? 3 A. I guess it is, yes. 4 Q. It's dated June 21, 2013 -- 5 A. Yes. 6 Q. -- right? 7 A. Yes. 8 Q. All right. Look at the sixth paragraph 9 down. Do you see that? 10 A. Yeah. 11 Q. It has Secretary LaHood being quoted; 12 correct? 13 A. Yes. 14 Q. Apparently he told The Detroit News 15 newspaper certain things; correct? 16 A. Yes. 17 Q. And one of the things he's quoted as 18 saying is, quote, "We've pretty much reached an 19 agreement there," close quote. 20 A. But, Mr. Butler, I think you should read 21 the previous sentence. It says, "LaHood told the 22 news Marchionne didn't realize how serious this was, 23 how serious we were, and the thing was resolved 24 satisfactorily. We reached an agreement then to get 25 the issue resolved, given the seriousness of the

Page 130 1 position taken by NHTSA." 2 That's what it says. It doesn't say that 3 we cut a deal that day. 4 Q. It doesn't say what you just said. 5 A. Yes, it does. I just read it. 6 Q. You added some stuff in there. 7 A. No, I didn't. That's what happened. 8 MR. BUTLER: Move to strike as 9 nonresponsive. 10 BY MR. BUTLER: 11 Q. Doesn't this article quote Secretary 12 LaHood as saying, quote, "We pretty much reached an 13 agreement there," close quote? Isn't that what it 14 says? 15 MS. OWENS: Objection to the form of the 16 question. 17 A. That's what it says. 18 BY MR. BUTLER: 19 Q. Thank you, sir. 20 MS. OWENS: I don't want to interrupt your 21 flow, Jim, but are we at a place where I can take a 22 break? 23 MR. BUTLER: Shortly. 24 MS. OWENS: Okay. 25 BY MR. BUTLER:	Page 132 1 tanks had a safety-related defect? 2 MS. OWENS: Objection to the form of the 3 question. 4 A. It said a number of things. That may be 5 one of them, yes. 6 BY MR. BUTLER: 7 Q. All right. Isn't it true that the meeting 8 on June 10th was in response to that letter? 9 A. Yes, it is. Yes, it was. 10 Q. Isn't it true that nobody from the Office 11 of Defects Investigation was at the meeting? 12 A. Yes, I guess that's true. 13 Q. Who prepared your talking points for that 14 meeting? 15 A. Mr. Chernoby and Mr. Betts. 16 Q. Did you bring a copy of them with you? 17 A. There were no talking points. They were 18 only giving me the -- some graphs which were 19 included in the white paper that were issued. 20 Q. There was no memo? 21 A. There was no memo. 22 Q. No documents? 23 A. No documents. 24 Q. Nobody prepared anything in writing for 25 you to review before you went to this meeting?
Page 131 1 Q. Isn't it true that because -- strike that. 2 Isn't it true that as a result of your 3 request that the meeting be only with -- that the 4 meeting only include the three of you, no one from 5 the Office of Defects Investigation was invited to 6 the meeting? 7 A. The only thing -- I don't know that, 8 because the only thing I said was that I was going 9 alone. 10 Q. Isn't it true that no one from the Office 11 of Defects Investigation was at the meeting? 12 A. That is true. 13 Q. In other words, none of the professionals 14 at ODI who had written that the Jeeps with rear gas 15 tanks had a, quote, "safety-related defect," close 16 quote, were invited to the meeting where what to do 17 about their finding was going to be discussed; isn't 18 that true? 19 MS. OWENS: Object to the form of the 20 question. 21 A. I don't know how to answer your question. 22 BY MR. BUTLER: 23 Q. Let me break it down. 24 Isn't it true that the ODI letter of 25 June 3, 2013, said that these Jeeps with rear gas	Page 133 1 A. No. 2 Q. Was the meeting with Mr. LaHood and 3 Mr. Strickland transcribed? 4 A. No, it was not. 5 Q. So there is no record of what was said; 6 correct? 7 A. There is no written record of what was 8 being discussed. 9 Q. Isn't it true that David Strickland now 10 works for a law firm that represents Chrysler Group 11 and Fiat? 12 A. I have no way of knowing that. 13 Q. You didn't know that Mr. Strickland went 14 to work at the Venable law firm? 15 A. I know that he's left NHTSA. That is the 16 only thing I know. 17 Q. Nobody's ever told you that? 18 A. No. 19 Q. You didn't have anything to do with 20 helping Mr. Venable get a job -- Mr. Strickland get 21 a job at Venable? 22 A. No. 23 Q. Do you dispute that the law firm where 24 David -- strike that. 25 Do you dispute that the law firm where

Page 134 1 David Strickland is now a partner actually does work 2 for Chrysler Group? 3 A. I have no knowledge of that fact. 4 (Plaintiffs' Exhibit #62 marked) 5 BY MR. BUTLER: 6 Q. Show you Plaintiffs' Exhibit No. 62. 7 That document proves -- that's from 8 Venable's law firm website. That document proves 9 Venable is a -- that Strickland is a partner there, 10 does it not? 11 MS. OWENS: Objection to the form of the 12 question. 13 A. I have no way of knowing. 14 BY MR. BUTLER: 15 Q. Well, it says that the -- 16 A. It says on top that, it says a partner, 17 yes -- 18 Q. Okay. 19 A. -- under his e-mail. 20 Q. Thank you. 21 A. I have no idea that Chrysler or Fiat uses 22 Venable. I don't even know who they are. 23 Q. Isn't it true that Venable actually does 24 lobbying work for Chrysler Group? 25 A. I have no way of knowing, and I do not	Page 136 1 (Plaintiffs' Exhibit #65 marked) 2 BY MR. BUTLER: 3 Q. Show you an article from the New York 4 Times, Plaintiffs' Exhibit No. 65. 5 Have you ever seen this article before? 6 A. No. 7 Q. Is there anybody at Chrysler Group in 8 Auburn Hills, Michigan, who is supposed to provide 9 you articles that appear in major American media? 10 A. Yes. We have a press office that screens 11 the press for relevant articles. 12 Q. But nobody sent you this one? 13 A. They may have sent it to me. I never read 14 it. I don't read them all. 15 Q. All right. The article is dated March 30, 16 2014; correct? 17 A. Yes. 18 Q. The title of the article in the New York 19 Times is, quote: "Carmakers' Close Ties to 20 Regulator Scrutinized"; correct? 21 A. That's what it says. 22 Q. Look at Page 4 of the article. 23 A. (Witness complies with request.) 24 Q. I think it's the fifth full article -- 25 full paragraph.
Page 135 1 know Venable. 2 (Plaintiffs' Exhibit #63 marked) 3 BY MR. BUTLER: 4 Q. Plaintiffs' 63, Exhibit -- Plaintiff's 5 Exhibit No. 63. 6 Isn't that a lobbying disclosure for the 7 Venable law firm -- 8 A. Yes. 9 Q. -- that lists Chrysler Group as a client 10 starting back in 2008 -- or 2009 for Chrysler Group, 11 going all the way through 2014? 12 A. Yes, that's what it says. 13 Q. Did you know on June 10, 2013, that 14 Strickland was going to be leaving Venable? 15 A. I had no idea. 16 Q. Or leaving NHTSA? 17 A. I had no idea. 18 Q. Did you -- were you aware that in fact 19 David Strickland's last day on the job with NHTSA 20 was the same day that NHTSA announced the final deal 21 with Chrysler on the Jeep investigation? 22 A. No -- 23 MS. OWENS: Objection to the form of the 24 question. 25 A. -- I had no idea.	Page 137 1 It says, quote, "Mr. Strickland's last day 2 at the agency was January 17, the day the agency 3 confirmed it had approved the trailer hitch remedy," 4 close quote. 5 Did I read that correctly? 6 A. That's what it says. 7 Q. Did you know that Secretary Ray LaHood 8 after the meeting in Chicago on June 10, 2013, also 9 went to work for a law firm? 10 A. No, I had no idea. 11 (Plaintiffs' Exhibit #66 marked) 12 BY MR. BUTLER: 13 Q. Show you Plaintiffs' Exhibit No. 66. 14 Doesn't this indicate that Mr. LaHood has 15 gone to work for a law firm called DLA Piper? 16 A. That's what it says. 17 Q. Does DLA Piper do work for Chrysler Group? 18 A. I have no way of knowing. 19 Q. Now, isn't it true that Mr. LaHood went to 20 work for this law firm, even though he's not even a 21 lawyer? 22 A. I had no idea he wasn't a lawyer. 23 Q. Isn't this business of top U. S. 24 government -- strike that. 25 Isn't this business of top U. S.

Page 138 1 government officials helping out a car corporation 2 really nothing new? 3 MS. OWENS: Objection to the form of the 4 question. 5 A. I have no idea how to answer your 6 question. 7 BY MR. BUTLER: 8 Q. Have you ever heard the term, quote, 9 "revolving door," close quote, used with respect to 10 NHTSA? 11 A. No. 12 Q. Do you know what it means? 13 A. I know what a revolving door is. 14 Q. Isn't it true that one of Chrysler's 15 lawyers in this case is Erika Jones, who previously 16 was the chief lawyer at NHTSA? 17 A. I'm aware of both of those facts. 18 Q. What, my statement is correct, is it not? 19 A. Yes. 20 Q. Thank you. 21 MR. BUTLER: You want a break? 22 MS. OWENS: Yeah. 23 THE VIDEOGRAPHER: Stand by, please. We 24 are off the record. The time is 11:51. 25 (Recess 11:51 a.m. to 12:12 p.m.)	Page 140 1 Strickland and LaHood in Chicago? 2 A. I think we ultimately resolved the issue 3 after -- yes, after that meeting. 4 Q. Isn't it true that a finding that these 5 Jeeps were defective would have hurt sales? 6 A. I don't know that. 7 Q. Isn't it true that a finding that the 8 Jeeps were defective would have constituted a 9 warning to the American people? 10 MS. OWENS: Objection to the form of the 11 question. 12 A. Yeah, I'm not sure that's true either. 13 BY MR. BUTLER: 14 Q. Isn't it true that in June of 2013 there 15 were roughly 2.7 million of these Jeeps with rear 16 gas tanks on the roads in this country? 17 A. I don't know the number. 18 Q. Look at Exhibit 40, ODI's June 3, '13, 19 letter -- 20 A. Yes. 21 Q. -- Page 4. 22 A. Page 4. Yes. 23 Q. Look at the -- under Data Analysis, the 24 third paragraph. The third sentence reads as 25 follows, quote: "Polk vehicle registration data
Page 139 1 THE VIDEOGRAPHER: Stand by, please. And 2 we are back on the record. The time is 12:12. You 3 may continue, sir. 4 BY MR. BUTLER: 5 Q. Isn't it true, sir, that one of the 6 reasons you and Chrysler Group didn't want a defect 7 finding is because that would have hurt car sales? 8 MS. OWENS: Object to the form of the 9 question. 10 A. Not at all. I think that our objection to 11 that determination was based on facts and our 12 analysis of the underlying data. And I think that 13 NHTSA, after thorough review of the information that 14 they had, and after comparison of their data with 15 ours, agreed with our view. 16 BY MR. BUTLER: 17 Q. Sir, isn't it true that what NHTSA finally 18 did came after your June 10, 2013, meeting with 19 Strickland and LaHood in Chicago? 20 A. I'm sorry. Could you rephrase the 21 question? 22 Q. No, I'll reread it. 23 A. Okay. 24 Q. Sir, isn't it true that what NHTSA finally 25 did came after your June 10, 2013, meeting with	Page 141 1 obtained by ODI shows that roughly 2.7 million of 2 the 4 million Liberty and Grand Cherokee vehicles 3 produced remained on the road in 2011." 4 Did I read that correctly? 5 A. That's what it says. 6 Q. All right. Do you dispute that? 7 A. No, I have no way of knowing otherwise. 8 Q. Isn't it true that all Chrysler agreed to 9 do was a recall limited to putting tow packages on 10 some of the Jeeps? 11 MS. OWENS: Objection to the form of the 12 question. 13 A. I think the recall measure that was agreed 14 reflected what was considered to be necessary for 15 the -- for NHTSA. 16 MR. BUTLER: Move to strike as 17 nonresponsive. 18 BY MR. BUTLER: 19 Q. Isn't it true that all Chrysler agreed to 20 do was a recall limited to putting tow packages on 21 some of the Jeeps? 22 MS. OWENS: Same objection. 23 A. That was the ultimate resolution of the 24 discussions with NHTSA, yes. 25 BY MR. BUTLER:

Page 142 1 Q. Isn't it true, sir, that Chrysler has 2 refused to do anything for those citizens who own 3 1999 through 2004 Jeep Grand Cherokees? 4 MS. OWENS: Objection to the form of the 5 question. 6 A. We're not required to do anything in 7 connection with those vehicles because there's been 8 no defect determined in connection with that class 9 of vehicles. 10 BY MR. BUTLER: 11 Q. In other words, Chrysler will not even put 12 a trailer hitch on the very Jeep Grand Cherokee in 13 which Remi Walden was killed; correct? 14 A. There is no defect in connection with 15 those cars. 16 Q. Was my statement correct? 17 A. Yes. There is no defect. 18 MR. BUTLER: Move to strike as 19 nonresponsive. 20 BY MR. BUTLER: 21 Q. Isn't it true that Chrysler will not even 22 put a trailer hitch on the very Jeep Grand Cherokee 23 that Remi was in when he was killed? 24 A. It's not -- 25 MS. OWENS: Objection to the form of the	Page 144 1 Do you see that on the first page? 2 A. Yes. 3 Q. All right. You see over on Page 233, the 4 last page of this document -- 5 A. Yeah. 6 Q. -- Mr. Castaing's answer, quote: "Let me 7 finish. The tow package does not protect the tank. 8 The skid plate underneath only protects the tank 9 from stones from the ground." 10 Do you see that? 11 A. I did read it. 12 Q. Pardon? 13 A. I did read it. 14 Q. Did I read that correctly? 15 A. That's what it says. 16 Q. All right. 17 A. I have no idea what it talks -- which car 18 it's making reference to. But, yes, that's what it 19 says. 20 Q. Mr. Castaing was a Chrysler engineer, was 21 he not? 22 A. I have no knowledge, don't know him. 23 Q. Wasn't he also president of Chrysler 24 International? 25 A. Don't know him.
Page 143 1 question. 2 A. It's not required. 3 BY MR. BUTLER: 4 Q. Isn't it true that Chrysler knew that a 5 tow package would not protect the people in these 6 Jeeps with rear gas tanks? 7 A. I have no way of knowing that. 8 Q. Isn't it true that Chrysler's former Head 9 of Engineering, Francois Castaing, has testified 10 under oath that, quote, "the tow package does not 11 protect the tank," close quote? 12 A. I have no knowledge. 13 Q. Are you familiar with Mr. Castaing? 14 A. I don't even know who Mr. Castaing is. 15 Q. Has anybody ever told you about his 16 testimony? 17 A. No, they have not. 18 (Plaintiffs' Exhibit #72-A marked) 19 BY MR. BUTLER: 20 Q. And I'll show you Plaintiffs' Exhibit 21 No. 72-A. 22 This is an excerpt from the sworn 23 testimony of François Castaing in a case called 24 Cline in New Jersey, and the testimony occurred on 25 June 14, 2011.	Page 145 1 (Plaintiffs' Exhibit #72-B marked) 2 BY MR. BUTLER: 3 Q. Show you Plaintiffs' Exhibit No. 72-B. 4 This is another excerpt from the same 5 deposition. And in the interest of time, if you'll 6 look at the last two pages of this marked as 7 Pages 16 and 17. Doesn't Mr. Castaing testify that 8 he was president of Chrysler International? 9 A. That's what it says. 10 Q. And that he was in charge of overseeing 11 and directing business of Chrysler outside of NAFTA 12 overseeing 47 countries? 13 A. Yes. 14 Q. All right. 15 A. That's what he says. 16 Q. Now, would you expect that Mr. Castaing, 17 the head of engineering at Chrysler, would know 18 something about trailer hitches and tow packages? 19 A. I have no idea whether he was the head of 20 engineering. 21 Q. Well, he said he was. 22 A. I couldn't find it here. Did I miss it? 23 Q. Well, maybe I missed it. 24 A. No, I'm sorry. 25 Q. Did you know whether or not Mr. Castaing

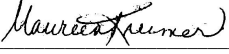
Page 146 1 knew something about tow packages? 2 A. I have no idea who Mr. Castaing is, and I 3 don't know where -- where is the reference to the 4 fact that he was the head of engineering? 5 MR. BUTLER: Move to strike as 6 nonresponsive. 7 BY MR. BUTLER: 8 Q. With respect to this trailer hitch idea, 9 isn't it also true that just last month Chrysler 10 announced that if a customer's rear end Jeep -- 11 strike that. 12 Isn't it also true that just last month 13 Chrysler announced that if a customer's rear tank 14 Jeep was too rusty, Chrysler would refuse to even 15 provide the free tow package? 16 A. Yes; because in that case I think it would 17 be ineffective. 18 Q. Isn't it true that if the gas tank needs 19 protection in low speed impacts, it obviously needs 20 protection at higher speeds? 21 MS. OWENS: Objection to the form of the 22 question. 23 A. I have no way of knowing. 24 BY MR. BUTLER: 25 Q. Isn't it true that when a rear gas tank is	Page 148 1 with the Federal Motor Vehicle Safety Standard does 2 not exempt a person from liability at common law? 3 MS. OWENS: Objection to the form of the 4 question. 5 A. It may. 6 (Plaintiffs' Exhibit #78 marked) 7 BY MR. BUTLER: 8 Q. Well, it does. 9 Plaintiffs' Exhibit No. 78, isn't that 10 what it says? 11 A. Yes. 12 Q. That's from 49 United States Code 13 Annotated 30103, for the record. 14 A. Yes. 15 Q. Isn't it also true that the federal 16 standards are merely minimum standards? 17 MS. OWENS: Objection to the form of the 18 question. 19 A. Don't know. They are required. 20 BY MR. BUTLER: 21 Q. Isn't that expressly what the law says? 22 A. I have no way of knowing what the law 23 says. 24 (Plaintiffs' Exhibit #79 marked) 25 BY MR. BUTLER:
Page 147 1 vulnerable to rear impact, it needs greater 2 protection at any speed? 3 MS. OWENS: Object to the form of the 4 question. 5 A. I have no way of knowing. 6 BY MR. BUTLER: 7 Q. Now, you've made a reference today to the 8 federal standards, and I want to talk to you about 9 that. We've already established this, you are a 10 lawyer; correct? 11 A. I used to be a practicing lawyer a long 12 time ago. 13 Q. Well, you have a law degree; correct? 14 A. Yes; and I have been called to the bar. 15 Q. Isn't it true that merely complying with a 16 federal minimum standard is no defense at all? 17 MS. OWENS: Object to the form of the 18 question, calls for a legal conclusion. 19 A. Can't answer the question. 20 BY MR. BUTLER: 21 Q. Have you ever read the Federal -- the 22 U. S. Federal Motor Vehicle Safety Act? 23 A. No, I have not. 24 Q. Isn't it true that the Federal Motor 25 Vehicle Safety Act explicitly states that compliance	Page 149 1 Q. Show you Plaintiffs' Exhibit No. 79. 2 This is 49 United States Code Annotated 3 Section 30102(a), General Definitions, 4 Subparagraph 9. Doesn't it state, quote: "'Motor 5 vehicle safety' standard means a minimum standard 6 for motor vehicle or motor vehicle equipment 7 performance"? 8 Did I read that correctly? 9 MS. OWENS: I object to the form of the 10 question to the extent that it's an excerpt that's 11 incomplete. 12 BY MR. BUTLER: 13 Q. Did I read that correctly? 14 A. You did read it correctly. 15 Q. Now, isn't it true that in that June 3, 16 2013, letter from the Office of Defects 17 Investigation to Chrysler, ODI wrote -- and if 18 you'll look at Page 4, I think you'll see this -- 19 A. Yes. 20 Q. -- the second paragraph: "As NHTSA has 21 noted in the past, a Federal Motor Vehicle Safety 22 Standard is a minimum standard for a motor vehicle 23 performance." 24 Did I read that correctly? 25 A. Yes.

Page 150 1 Q. ODI also wrote, quote: "The existence of 2 a minimum standard does not require NHTSA to ignore 3 deadly problems." 4 Did I read that correctly? 5 A. You certainly did. And NHTSA also went on 6 to say that the vehicle in question did not 7 provide -- did not have a safety defect. 8 Q. When did NHTSA say that? 9 A. In a later -- in their ultimate finding, 10 when they said -- 11 Q. After June 10, 2013? 12 A. After June 10th. 13 Q. After your secret private meeting with 14 LaHood and Strickland; correct? 15 MS. OWENS: Objection to the form of the 16 question. 17 A. I'm not sure there was anything secret 18 about the meeting. 19 BY MR. BUTLER: 20 Q. Who else knew about it besides -- 21 A. Well, obviously Automotive News knew about 22 it because you showed me an article. 23 Q. That was after it happened, wasn't it, 24 sir? 25 A. Yeah, but normally we --	Page 152 1 some cases we have intentionally gone beyond the 2 minimum safety standards. 3 MR. BUTLER: Move the last sentence -- 4 move to strike the last sentence as nonresponsive. 5 BY MR. BUTLER: 6 Q. Isn't it true that for the Grand Cherokees 7 Chrysler did nothing but test for compliance with 8 the minimum standard? 9 A. I have no way of knowing that. 10 Q. Before you publicly stated that these 11 Jeeps with rear gas tanks were, quote, "absolutely 12 safe," close quote, did you read any of the warnings 13 that Chrysler's own customers had given to Chrysler 14 about those vehicles? 15 A. No. 16 Q. Are you familiar with any of those 17 warnings? 18 A. I don't know what you mean by "warning," 19 but the answer is no. 20 Q. Well, did you see any of the letters that 21 Chrysler's own customers had written to Chrysler 22 about these Jeeps with rear gas tanks relating their 23 own experiences when their Jeeps with rear gas tanks 24 got hit in the rear? 25 A. No, I have not.
Page 151 1 Q. Before the meeting happened, who knew 2 about that meeting except you and your staff at 3 Chrysler Group, Strickland, and maybe a couple of 4 people at NHTSA, and Mr. LaHood? Did anybody else 5 know about it? 6 A. I have no idea who else knew. But we -- 7 Q. Did you tell anybody? 8 A. No. But we normally don't advertise 9 meetings with people, with the -- 10 Q. Especially government officials; right? 11 A. We normally don't do that. 12 Q. It was meant to be a secret, private 13 meeting, was it not? 14 MS. OWENS: Objection to the form of the 15 question. 16 A. No. I think it was designed to be a 17 meeting between Chrysler and NHTSA, to which the 18 Secretary of Transportation showed up. 19 BY MR. BUTLER: 20 Q. Is it your position that merely complying 21 with the federal minimum standard is all an 22 automaker has to do? 23 MS. OWENS: Objection to the form of the 24 question. 25 A. No, I don't think so. And effectively in	Page 153 1 Q. Have you ever heard of a fellow named 2 Howard Persinger? 3 A. No, I have not. 4 Q. Were you aware that Mr. Persinger has 5 testified that -- about a wreck that he was involved 6 in involving -- with one of these Jeeps with rear 7 gas tanks? 8 MS. OWENS: Objection to the form of the 9 question. 10 MR. BUTLER: Strike that and let me -- 11 strike that question, you're right. 12 BY MR. BUTLER: 13 Q. Are you aware that Mr. Persinger has 14 testified that his daughter -- 15 MS. OWENS: Son. 16 MR. BUTLER: Strike that. Go off video 17 just a minute and let me get organized here. 18 THE VIDEOGRAPHER: Okay. We are off the 19 video. 20 (Off video record.) 21 (Off-the-record discussion.) 22 THE VIDEOGRAPHER: We're back on video. 23 The time is 12:27. 24 BY MR. BUTLER: 25 Q. Were you aware that Mr. Howard Persinger

Page 154 1 has testified that his son narrowly escaped burning 2 alive in a Jeep with a rear gas tank that got hit in 3 the rear? 4 MS. OWENS: Objection to the form of the 5 question. 6 A. Not aware. 7 BY MR. BUTLER: 8 Q. Have you ever seen a letter that Norma 9 Jane Friend sent to Chrysler on March 3, 1998? 10 A. No. 11 (Plaintiffs' Exhibit #81 marked) 12 BY MR. BUTLER: 13 Q. Show it to you. Plaintiffs' Exhibit 14 No. 81. 15 Apparently Ms. Friend works for an 16 organization called Gianettino & Meredith, which is 17 an advertising company in New Jersey, according to 18 the letter; correct? 19 A. Yes. 20 Q. The letter is dated -- excuse me, I've got 21 the date wrong. The letter is dated February 26, 22 1998; correct? 23 A. That's what it says, yes. 24 Q. And it indicates that two weeks prior to 25 that her daughter was stopped at a traffic light in	Page 156 1 Q. Did you know that in this case Chrysler 2 Group has blamed Remington's parents for not knowing 3 that these rear gas tank Jeeps were dangerous? 4 A. I -- 5 MS. OWENS: Objection to the form of the 6 question. 7 A. I have no knowledge. 8 BY MR. BUTLER: 9 Q. Did you know that Chrysler Group has 10 blamed the Walden family for not knowing that their 11 Grand Cherokee was unsafe from reading about the 12 NHTSA investigation? 13 MS. OWENS: Object to the form of the 14 question. 15 A. I have no knowledge. 16 (Plaintiffs' Exhibit #82 marked) 17 BY MR. BUTLER: 18 Q. Showing you Plaintiffs' Exhibit No. 82. 19 Here, let me give you the official one. 20 That's got the official stamp on it. 21 A. Okay. 22 Q. This is a copy of the first and 39th page 23 of Chrysler Group's Motion for Summary Judgment 24 submitted to Judge Chason in this case. And look at 25 what's the second page of this document, which is
Page 155 1 a 1997 Grand Cherokee and was hit in the rear -- and 2 her car was hit in the rear. 3 Do you see that in the second paragraph? 4 A. Yes. 5 Q. Okay. How about the -- look at the fourth 6 paragraph. 7 A. (Witness complies with request.) 8 Q. Quote: "However, in thinking about this 9 afterwards, I can only imagine how horrible a 10 situation it would be if a driver had to remove a 11 child from a car seat or could not get out of the 12 car within moments." 13 Did I read that correctly? 14 A. That's what it says. 15 Q. Before you told the American -- before you 16 as CEO of Chrysler Group, LLC, told the American 17 public that these Jeeps with rear gas tanks were 18 absolutely safe, did you review any letters like 19 this that had come into Chrysler? 20 A. No; but I reviewed all the statistics in 21 connection with events surrounding the Grand 22 Cherokee and other Jeeps. 23 MR. BUTLER: Move to strike the latter 24 part as nonresponsive. 25 BY MR. BUTLER:	Page 157 1 Page 39 from that brief that Chrysler Group filed, 2 the second full paragraph. 3 A. (Witness complies with request.) 4 Q. Quote: "Finally, the Waldens, likewise, 5 allowed their child to ride in the vehicle after 6 news and media coverage about the NHTSA 7 investigation into the subject vehicle." 8 Do you see that? 9 A. Yes. 10 Q. Isn't it true, sir, that you and Chrysler 11 group were telling the American people and wanted 12 the American people to believe that those Jeeps 13 were, quote, "absolutely safe"? 14 A. And in our view, they still are. 15 Q. Let me repeat the question. 16 MR. BUTLER: Move to strike as 17 nonresponsive. 18 BY MR. BUTLER: 19 Q. Isn't it true, sir, that you and Chrysler 20 Group were telling the American people, and wanted 21 the American people, to believe that those Jeeps 22 were, quote, "absolutely safe," close quote? 23 A. They are safe. 24 Q. Isn't that what you're trying to convince 25 the people?

Page 158 1 A. Yes. 2 Q. You're trying to tell the people, there 3 was no reason to be warned about it; correct? Isn't 4 that correct? 5 A. I guess. I don't know how to answer your 6 question. I mean, other than the fact that I have 7 stated on the record, and I'll repeat it again, that 8 these vehicles are deemed to be safe by us and a 9 position that has been agreed with and understood by 10 NHTSA. 11 Q. Is it your testimony here today, sir, that 12 there is no problem at all with these Jeeps with 13 rear gas tanks? 14 A. I think that there are unfortunate events 15 surrounding the use of cars, and I find these 16 deplorable, I think it's unfortunate, and people 17 will suffer injury as a result of driving or riding 18 in vehicles. But I don't think that there is the 19 slightest evidence that Grand Cherokees or the class 20 that we're talking about here are defective. 21 I think we've made extensive analysis of 22 the underlying data. All this information has been 23 made public. It's been shared with NHTSA. And I 24 think their latest view, which, obviously, we concur 25 with, is that there is no defect in association in	Page 160 1 MS. OWENS: Objection to the form of the 2 question. 3 A. I have no way of knowing. 4 BY MR. BUTLER: 5 Q. If the jury finds that this car is 6 defective, and that the defect caused Remington 7 Walden's death, will you agree that Chrysler Group 8 should be held responsible? 9 MS. OWENS: Objection to the form of the 10 question; calls for a legal conclusion; is 11 argumentative. 12 A. I don't know how to answer your question. 13 BY MR. BUTLER: 14 Q. You can say "yes" or "no." 15 A. I know I could, but I don't know how to do 16 that. 17 Q. What about my question is confusing? 18 A. I don't know what answer you would like me 19 to give you. 20 Q. Whichever one you think is the truth. 21 A. I don't know how to answer it. 22 Q. Let me repeat it. 23 A. I think we will follow whatever decision 24 is made by the court. 25 Q. Do you agree that if the jury finds this
Page 159 1 conjunction with these cars. 2 MR. BUTLER: Move to strike as 3 nonresponsive. 4 BY MR. BUTLER: 5 Q. Let me repeat my question. 6 Is it your testimony here today, sir, that 7 there is no problem with these Jeeps with rear gas 8 tanks, "yes" or "no"? 9 MS. OWENS: Objection, asked and answered. 10 A. There is no defect in asso- -- in 11 conjunction with these cars. 12 BY MR. BUTLER: 13 Q. Do you agree with me that burning to death 14 is a horrible way to die? 15 MS. OWENS: Objection to the form of the 16 question. 17 A. Yes, I do. 18 BY MR. BUTLER: 19 Q. Will you agree with me that the Walden -- 20 strike that. 21 Will you agree with the Walden family that 22 no one who knows what they know now would ever put 23 their child into one of these Jeeps with the rear 24 gas tank? 25 A. I --	Page 161 1 car is defective, and that the defect caused Remi's 2 death, Chrysler Group should be held responsible? 3 MS. OWENS: Objection. Same objection. 4 A. I don't know how to answer your question. 5 I'm sorry. 6 BY MR. BUTLER: 7 Q. Is your corporation willing to warn 8 Americans that the Jeeps with rear gas tanks are 9 vulnerable to rear impacts and may explode in 10 flames? 11 MS. OWENS: Objection to the form of the 12 question. 13 A. I think we are willing to do everything 14 that which has been agreed with NHTSA as a proper 15 solution to this problem going forward. 16 MR. BUTLER: Move to strike as 17 nonresponsive. 18 BY MR. BUTLER: 19 Q. Is your corporation willing to warn 20 Americans that these Jeeps with rear gas tanks are 21 vulnerable to rear impacts and may explode in 22 flames, "yes" or "no"? 23 MS. OWENS: Same objection. And you don't 24 have to answer "yes" or "no" if you can't answer 25 "yes" or "no."

Page 162 1 A. I don't know how to answer your question, 2 and I think your statement is false. 3 BY MR. BUTLER: 4 Q. Will you admit that these Jeeps with rear 5 gas tanks are not absolutely safe? 6 A. I will not agree to that statement. 7 Q. If the jury finds that Chrysler Group is 8 liable for Remington's injuries and death, will you 9 commit today that Chrysler Group will accept the 10 jury's judgment and pay the verdict? 11 MS. OWENS: Objection to the form of the 12 question. That's absolutely improper, and I 13 instruct the witness not to answer. 14 BY MR. BUTLER: 15 Q. Are you going to follow that instruction? 16 A. I am going to follow instructions. 17 MR. BUTLER: Let's go off the video just a 18 moment. 19 THE VIDEOGRAPHER: Stand by. We're off 20 video. 21 (Off video record.) 22 MR. BUTLER: Back on the video. 23 THE VIDEOGRAPHER: Stand by. And we are 24 back on video record. 25 MR. BUTLER: Those are all my questions.	Page 164 1 The following reporter and firm 2 disclosures were presented by me at this proceeding 3 for review by counsel: 4 REPORTER DISCLOSURES 5 The following representations and 6 disclosures are made in compliance with Georgia Law, 7 more specifically: 8 Article 10 (B) of the Rules and Regulations of the 9 Board Of Court Reporting (disclosure forms) 10 OCGA Section 9-11-28 (c) (disqualification of 11 reporter for financial interest) 12 OCGA Sections 15-14-37 (a) and (b) (prohibitions 13 against contracts except on a case-by-case basis). 14 - I am a certified reporter in the State of Georgia. 15 - I am an employee or independent contractor of 16 Tiffany Alley Global Reporting and Video ("Tiffany 17 Alley Global"). 18 - I have been assigned to make a complete and 19 accurate record of these proceedings. 20 - I have no relationship of interest in the matter 21 on which I am about to report which would 22 disqualify me from making a verbatim record or 23 maintaining my obligation of impartiality in 24 compliance with the Code of Professional Ethics. 25 - I have no direct contract with any party in this 26 action, and my compensation is determined solely 27 by the terms of my agreement with Tiffany Alley 28 Global. 29 TIFFANY ALLEY GLOBAL REPORTING & VIDEO 30 FIRM DISCLOSURES 31 - Tiffany Alley Global Reporting & Video was 32 contacted to provide reporting services by the 33 noticing or taking attorney in this matter. 34 - There is no agreement in place between Tiffany 35 Alley Global and any party or attorney in this 36 litigation that is prohibited by OCGA 15-14-37 (a) 37 and (b). Any case-specific discounts are 38 automatically applied to all parties, at such 39 time as any party receives a discount. 40 - Transcripts: The transcript of this proceeding as 41 produced by Tiffany Alley Global will be a 42 true, correct, and complete record of the 43 colloquies, questions, and answers as submitted by 44 the certified court reporter. 45 - Exhibits: No changes will be made to the exhibits
Page 163 1 MS. OWENS: Let's go off the record and 2 off the video. 3 THE VIDEOGRAPHER: We're off video record. 4 The time is 12:36. 5 (Recess 12:36-12:38 p.m.) 6 THE VIDEOGRAPHER: And we are back on the 7 record. The time is 12:38. You may continue. 8 MS. OWENS: Mr. Betts, do you have any 9 questions? 10 MR. BETTS: No questions at this time. 11 MS. OWENS: And I have no questions at 12 this time. 13 MR. BUTLER: Thanks to everybody. 14 THE VIDEOGRAPHER: Stand by, please. This 15 concludes this videotaped deposition. The time is 16 12:38. We are off the record. 17 (Deposition concluded at 12:38 p.m.) 18 (Signature is reserved.) 19 20 21 22 23 24 25	Page 165 1 as submitted by the reporter, attorneys, or 2 witnesses. 3 - Password-Protected Access: Transcripts and 4 exhibits relating to this proceeding will be 5 uploaded to a password-protected repository, to 6 which all ordering parties will have access. 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25

Page 166 CERTIFICATE 1 2 STATE OF GEORGIA: 3 COUNTY OF FULTON: 4 I hereby certify that the foregoing 5 transcript was taken down, as stated in the caption, 6 and the colloquies, questions and answers were 7 reduced to typewriting under my direction; that the 8 transcript is a true and correct record of the 9 evidence given upon said proceeding. 10 I further certify that I am not a relative 11 or employee or attorney of any party, nor am I 12 financially interested in the outcome of this 13 action. 14 I have no relationship of interest in this 15 matter which would disqualify me from maintaining my 16 obligation of impartiality in compliance with the 17 Code of Professional Ethics. 18 I have no direct contract with any party in 19 this action and my compensation is based solely on 20 the terms of my agreement with my employer. 21 Nothing in the arrangements made for this 22 proceeding impacts my absolute commitment to serve 23 all parties as an impartial officer of the court. 24 This the 12th day of January 2015. 25  MAUREEN KREIMER, CCR-B-1379 Notary Public in and for the State of Georgia. My Commission Expires August 14, 2016.	Page 168 1 TO: Diane Owens 2 Re: Signature of Deponent Sergio Marchionne 3 Date Errata due back at our offices: 2/12/2015 4 5 Greetings: 6 The deponent has reserved the right to read and sign. 7 Please have the deponent review the attached PDF 8 transcript, noting any changes or corrections on the 9 attached PDF Errata. The deponent may fill out the 10 Errata electronically or print and fill out manually. 11 12 Once the Errata is signed by the deponent and notarized, 13 please mail it to the offices of Tiffany Alley (below). 14 15 When the signed Errata is returned to us, we will seal 16 and forward to the taking attorney to file with the 17 original transcript. We will also send copies of the 18 Errata to all ordering parties. 19 20 If the signed Errata is not returned within the time 21 above, the original transcript may be filed with the 22 court without the signature of the deponent. 23 24 25 Please send completed Errata to: Tiffany Alley Global Reporting & Video 730 Peachtree St. NE, Ste 470 Atlanta, GA 30308 (770) 343-9696
Page 167 TIFFANY ALLEY GLOBAL REPORTING & VIDEO FIRM CERTIFICATE AND DISCLOSURE 1 2 3 4 Tiffany Alley Global Reporting & Video represents that 5 the foregoing transcript as produced by our Production 6 Coordinators, Georgia Certified Notaries, is a true, 7 correct and complete transcript of the colloquies, 8 questions and answers as submitted by the certified 9 court reporter in this case. Tiffany Alley Global 10 further represents that the attached exhibits, if any, 11 are a true, correct and complete copy as submitted by 12 the certified reporter, attorneys or witness in this case; 13 and that the exhibits were handled and produced exclusively 14 through our Production Coordinators, Georgia Certified 15 Notaries. Copies of notarized production certificates 16 related to this proceeding are available upon request to 17 production@tiffanyalley.com. 18 19 Tiffany Alley Global Reporting & Video is not taking this 20 deposition under any relationship that is prohibited by 21 OCGA 15-14-37(a)and(b). Case-specific discounts are 22 automatically applied to all parties, at such time as any 23 party receives a discount. Ancillary services such as 24 calendar and financial reports are available to all 25 parties upon request.	Page 169 1 ERRATA 2 I, the undersigned, do hereby certify that I have read the 3 transcript of my testimony, and that 4 ___ There are no changes noted. 5 ___ The following changes are noted: 6 7 Pursuant to Rule 30(7)(e) of the Federal Rules of Civil 8 Procedure and/or OCGA 9-11-30(e), any changes in form or 9 substance which you desire to make to your testimony shall 10 be entered upon the deposition with a statement of the 11 reasons given for making them. To assist you in making any 12 such corrections, please use the form below. If additional 13 pages are necessary, please furnish same and attach. 14 15 Page ____ Line ____ Change ____ 16 17 Reason for change ____ 18 Page ____ Line ____ Change ____ 19 20 Reason for change ____ 21 Page ____ Line ____ Change ____ 22 23 Reason for change ____ 24 Page ____ Line ____ Change ____ 25 26 Reason for change ____

Page 170 1 Page ____ Line ____ Change ____ 2 _____ 3 Reason for change _____ 4 Page ____ Line ____ Change ____ 5 _____ 6 Reason for change _____ 7 Page ____ Line ____ Change ____ 8 _____ 9 Reason for change _____ 10 Page ____ Line ____ Change ____ 11 _____ 12 Reason for change _____ 13 Page ____ Line ____ Change ____ 14 _____ 15 Reason for change _____ 16 Page ____ Line ____ Change ____ 17 _____ 18 Reason for change _____ 19 _____ 20 _____ DEPONENT'S SIGNATURE 21 Sworn to and subscribed before me this ____ day of 22 _____, ____. 23 _____ 24 NOTARY PUBLIC 25 My Commission Expires: _____	

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