

Dillon dep Exhibit \_\_\_\_ (5 pages)

Isn't it true that, during a previous defect investigation by NHTSA the issue of employee whistleblowers was discussed by Chrysler executive management?

Looking at the second page to Exhibit \_\_\_\_ to your deposition, where Chrysler has redacted the fourth point . . .

Isn't it true that-that point was presented by Mr. Lewis Goldfarb on Tuesday, December 13, 1994?

Isn't it true that the subject of that point was Kline case plaintiff's expert Paul Sheridan, former head of the Minivan Safety Leadership Team?

Isn't it true that the Chrysler office files of plaintiff's expert Paul Sheridan were removed from his office under direction of the Chrysler Legal department **a mere 4 business days later on Monday, December 19, 1994?!**

Looking at the fourth PAGE to Exhibit \_\_\_\_ to your deposition . . .

Angel, review paragraph 5!

Review paragraph 6!

Looking at paragraph number 6, just so the jury in this case understands, do you see Mr. Dillon the sentence that says:

**“ . . . tell NHTSA to pound sand”**

What does that mean?

Looking at the fifth page to Exhibit \_\_\_\_ to your deposition . . . under paragraph number 9 which is entitled “Final Point.” Do you see Mr. Dillon where it states that Chrysler was seeking to limit the investigations of NHTSA by using the funding issues in Congress?

T. G. DENOMME

December 13, 1994

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

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

/bw

*Eaton*  
 EXHIBIT NO. 15  
 8-28-97  
 M. MOORE

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

REDACTED DOCUMENT

MINIVAN LATCH ISSUES  
AGENDA

DECEMBER 13, 1994

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

1 hour, 50 minutes

12/13/94

TH002785

DOCUMENT PURSUANT TO A PROTECTIVE ORDER IN SERGIO V. JIMENEZ, et al. v. CHRYSLER

Vice C

T. G. DENOMME

December 9, 1994

R. J. Eaton  
R. A. Lutz

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

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

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

TGD:bw

*[Handwritten signature]*

Eaton  
EXHIBIT NO. 14  
8-28-97  
M. MOORE

TD000099

DOCUMENT PRODUCED  
PROFITABLE TO A  
CHRYSLER



Confidential and Privileged

T. G. DENOMME

REDACTED  
DOCUMENT

December 9, 1994

R. J. Eaton  
R. A. Lutz

MINIVAN LATCH MEETING

A preview of next Tuesday's meeting:

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

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REDACTED DOCUMENT

[REDACTED]

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

7. [REDACTED]

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

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

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

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

IN JUNE 1981  


T. G. Denomme

TGD:bw