Dillon dep Exhibit (2	2 pages)
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Looking at Exhibit ____ to your deposition . . . Do you see where some of the office files of former head of the Safety Leadership Team, plaintiff's expert Paul Sheridan were released to the public after inspection by a Judge?

Isn't that true that after a FIRST-TIME inspection by a non-Chrysler lawyer, by a Judge, those documents were deemed not to contain any trade secret information,?

Perry & Haas, L.L.P.

ATTORNEYS AT LAW

2100 Frost Bank Plaza, P.O. Box 1500, Corpus Christi, Texa; 78403-1500 Telephone: 512/830-7500 Facsim:le: 512/887-9507 Direct Dial: 512/880-7543

July 15, 1996

Mr. Paul Sheridan 22357 Columbia Street Dearborn, Michigan 48124-3431

Via Fax: (313) 277-5095

Re:

Gonzalez v. Chrysler

Dear Paul:

On Friday, July 12, we had a hearing to try to release 30,000 pages of Chrysler documents, all of the depositions taken (including yours), and other materials produced in the case. The Judge basically produced it all. Here is some press coverage that relates to the same. The deposition that you gave in the case is no longer under seal and has been quoted extensively in the Dallas Morning News article. After we won the hearing, I gave them a copy of the transcript. The transcript and the videotape are now considered public record.

You may want to let Courtney know about this, as it may affect what you all want to do in terms of the next step of your lawsuit.

I assume that the above pleases you.

Very truly yours,

PERRY & HAAS, L.L.P.

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Mikal C. Watts

MCW/jlh

Attachments

MIKAL C. WATTS

Attorney at Law

Perry & Haas is a limited liability partnership that includes professional corporations

CAUSE NO. 37,346

JOHN AND TAMMY MATTHEWS, INDIVIDUALLY AND AS NEXT FRIENDS FCR STEVI WESTON, A MINGR

IN THE DISTRICT COURT OF

VS.

ANDERSON COUNTY, TEXAS

CHARLES ORTIZ SMITH,
ELKHART INDEPENDENT
SCHOOL DISTRICT, CHRYSLER
CORPORATION, AND ROGER
CONN CHRYSLER-DODGEPLYMOUTH-JEEP-EAGLE, INC.

THIRD JUDICIAL DISTRICT

RE: EXHIBITS TO PAUL SHERIDAN DEPOSITION

On July 12, 1996 certain documents consisting of Exhibits to the Deposition of Paul Sheridan were submitted for in camera inspection. After examining the documents submitted it is ordered that:

- (a) The protections claimed for Exhibits: 8,10, 12, 22 and 23 are denied;
- (b) The protections claimed for Exhibits: 11, 14, 15, 16, 17, 18, 19, 20, 21 and 50 are sustained.
- (c) The Exhibits which are protected pursuant to this order shall remain sealed and filed with the papers of this cause.
- (d) The Exhibits submitted which are not protected pursuant to this order are ordered to be placed in a seperate envelope and sealed by the District Clerk for 14 days from this date.

If there is no further order before that date the Clerk is then directed to unseal those records and make them available for inspection during normal business hours

Signed this ______ day of July, 1996.

Presiding Judge

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