

Dillon dep Exhibit \_\_\_\_ (2 pages)

Looking at Exhibit \_\_\_\_ to your deposition . . . Do you see where a Freedom of Information Act request made in 1999 by the Center for Auto Safety upon NHTSA was granted?

In other words, all Chrysler office file documents that were formerly in the possession of plaintiff's expert Paul Sheridan, which had been shared with NHTSA, were released to the public; is that what this says?



U.S. Department  
of Transportation  
**National Highway  
Traffic Safety  
Administration**

400 Seventh St., S.W.  
Washington, D.C. 20590

**JUL 13 2000**

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Michael Kido  
Legal Staff  
1825 Connecticut Avenue, N.W.  
Suite 330  
Washington, D.C. 20009-5708

RE: Appeal under the Freedom of Information Act

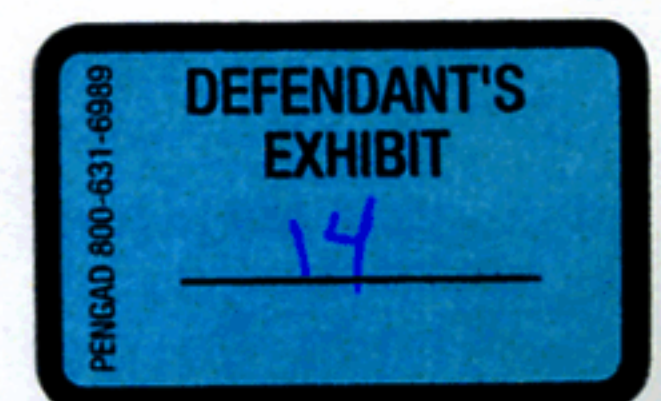
Dear Mr. Kido:

This is in further response to your letter, dated July 7, 1999, in which you appeal a Freedom of Information Act ("FOIA") determination, dated June 11, 1999, by Ms. Heidi L. Coleman, Assistant Chief Counsel for General Law. This also responds to your letter dated June 9, 2000, in which you requested an update as to the status of your appeal.

On May 13, 1999, you submitted a FOIA request for:

The complete set of documents provided by Paul Sheridan to NHTSA during a meeting between NHTSA representatives and Sheridan on April 11, 1995 concerning the Chrysler Minivan liftgate latch investigation.

On June 11, 1999, Ms. Coleman responded to your request. She advised you that material responsive to your request could be obtained from the public file for EA94-005 in the agency's Technical Information Services Division (TIS). She noted that portions of this material had been withheld pursuant to exemption 6 of the FOIA, 5 U.S.C. 552(b)(6), because their release would cause an unwarranted invasion of personal privacy. In addition, she noted that certain other portions of the information had been withheld pursuant to exemption 4 of the FOIA, 5 U.S.C. § 552(b)(4), because their release would cause substantial competitive harm to DaimlerChrysler.



On March 15, 2000, I responded to your appeal and informed you that, in light of the passage of time, we had requested that DaimlerChrysler confirm whether it continued to claim confidentiality for the materials that were withheld. Since that time, DaimlerChrysler has informed us that it consents to the release of the materials that were previously protected. Accordingly, the agency has decided to grant your appeal and make a discretionary release of the information that was previously withheld from the documents provided to the agency by Paul Sheridan. A copy of this material is enclosed. We note, however, that we are continuing to withhold names of consumers who wrote to Chrysler, under exemption 6 of the FOIA, 5 USC 552(b)(6), to protect the privacy of these individuals.

I am the person responsible for this decision. It is administratively final. If you wish to seek review of my decision, you may do so in the U.S. District Court for the District of Columbia or in the district in which you reside, have your principal place of business or where the records are located.

Sincerely,

A handwritten signature in black ink, appearing to read "Herman L. Simms", with a large, sweeping flourish extending to the right.

Herman L. Simms  
Associate Administrator  
for Administration

Enclosure