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July 24, 2012

VIA FAX & REGULAR MAIL

Angel M. DeFilippo, Esq.
Grieco, Oates & De Filippo, LLC
414 Eagle Rock Avenue, Suite 200
West Orange, New Jersey 07052

RE: Kline v. Morgan-Alcala, et al
Docket No. MRS-L-3575-08
Our File No. 2670.0005

Dear Ms. DeFilippo:

Enclosed are Chrysler Group LLC's Responses to Plaintiff's Notice to Produce in regard to the captioned matter.

Very truly yours,

A handwritten signature in black ink, appearing to read 'R. M. Cook', written over a horizontal line.

ROBERT M. COOK

RMC/laf
Enclosures

cc: Matthew D. Stockwell, Esq.
Callahan & Fusco, LLC

Patrick J. Hermesmann, Esq.
Terkowitz & Hermesmann

James T. Gill, Esq.
Leary, Bride, Tinker & Moran

GOLDBERG SEGALLA, LLP
902 Carnegie Center
Suite 100
Princeton, New Jersey 08540
(609) 986-1300
Attorneys for Defendant, Chrysler Group LLC

THOMAS KLINE, AS	:	SUPERIOR COURT OF NEW JERSEY
ADMINISTRATOR AD	:	LAW DIVISION
PROSEQUENDUM OF THE HEIRS AT	:	
LAW OF SUSAN MORRIS KLINE,	:	MORRIS COUNTY
(DECEASED), AS ADMINISTRATOR	:	DOCKET NO. MRS-L-3575-08
OF THE ESTATE OF SUSAN MORRIS	:	
KLINE, and THOMAS KLINE,	:	
INDIVIDUALLY,	:	
	:	CIVIL ACTION
Plaintiff(s),	:	
	:	
v.	:	
	:	
VICTORIA MORGAN-ALCALA,	:	CHRYSLER GROUP LLC'S
CARLOS ALCALA, NATALIE RAWLS,	:	RESPONSES TO PLAINTIFF'S
DAIMLER CHRYSLER	:	NOTICE TO PRODUCE
CORPORATION A/K/A CHRYSLER	:	DOCUMENTS, RECORDS AND
CORPORATION, LOMAN AUTO	:	INFORMATION PURSUANT TO
GROUP, CHRYSLER GROUP LLC (For	:	RULE 4:18-1
Discovery Purposes) JOHN DOES A	:	
THROUGH Z, (Names being Fictitious),	:	
ABC CORPORATIONS, 1 THROUGH	:	
100, (Names Being Fictitious)	:	
	:	
Defendant(s).	:	

Chrysler Group LLC responds to Plaintiff's Notice to Produce Documents,

Records and Information Pursuant to Rule 4:18-1 as follows:

PRELIMINARY STATEMENT

Chrysler Group LLC did not design, manufacture or test the vehicle at issue, a 1996 Jeep Grand Cherokee (ZJ), VIN 1J4GZ58S9TC401311. Chrysler Corporation had overall responsibility for the design, manufacture and testing of the 1996 Jeep Grand Cherokee (ZJ), VIN 1J4GZ58S9TC401311. Effective November 17, 1998, Chrysler Corporation changed its name to DaimlerChrysler Corporation. It was a predecessor to Chrysler LLC. On April 30, 2009, Chrysler LLC, subsequently known as Old Carco LLC, and certain domestic direct and indirect subsidiaries (the 'Debtors'), filed voluntary petitions for relief in the United States Bankruptcy Court for the Southern District of New York under Chapter 11 of Title 11 of the United States Code, which cases are being jointly administered and are currently pending before the Honorable Stuart M. Bernstein as Case No. 09-50002.

By Order dated June 1, 2009, the Bankruptcy Court issued an Order (I) Authorizing the sale to an entity now known as Chrysler Group LLC of substantially all of the Debtors' assets free and clear of all liens, claims, interests and encumbrances, (II) Authorizing the assumption and assignment of certain executory contracts and unexpired leases in connection therewith and related procedures, and (III) Granting related relief. The sale closed on June 10, 2009.

These responses are made solely for the purpose of this action. Each response is made subject to all objections as to competence, materiality, relevance or other objection as to admissibility that may apply in the event that any such response, or the information

contained therein, is sought to be used in court. Chrysler Group LLC ("Chrysler Group") expressly reserves all such objections.

RESPONSES TO NOTICE TO PRODUCE DOCUMENTS

REQUEST NO. 1: 1. Please provide non-redacted versions of the following documents which were originally created by the now-bankrupt Chrysler, LLC:

All 10-panel, 11-panel and/or 12-panel charts which were created prior to and during the manufacture and sale of the 1996 ZJ-Body vehicle which was marketed as the Jeep Grand Cherokee.

All financial planning documents that contain or relate in any way to the 1996 ZJ-Body vehicle which was marketed as the Jeep Grand Cherokee.

All financial status documents that contain or relate in any way to the 1996 ZJ-Body vehicle which was marketed as the Jeep Grand Cherokee.

All internal memos or documents **that contain financial** data that relate in any way to the 1996 ZJ-Body vehicle which was marketed as the Jeep Grand Cherokee.

All Product Planning Sub-Committee meeting minutes that were created prior to and during the manufacture and sale of the 1996 ZJ-Body, which was marketed as the Jeep Grand Cherokee, that contain financial data regarding the 1996 ZJ-Body.

All Product Planning Committee (PPC) meeting minutes that were created prior to and during the manufacture and sale of the 1996 ZJ-Body vehicle, which was marketed as the Jeep Grand Cherokee, that contain financial data regarding the 1996 ZJ-Body.

All Product Planning Sub-Committee meeting presentations or papers that were created prior to and during the manufacture and sale of the 1996 ZJ-Body, which was marketed as the Jeep Grand Cherokee, that contain or relate in any way to the 1996 ZJ-Body vehicle.

All Product Planning Committee (PPC) meeting presentations or papers that were created prior to and during the manufacture and sale of the 1996 ZJ-Body, which was marketed as the Jeep Grand Cherokee, that contain or relate in any way to the 1996 ZJ-Body vehicle.

All Product Planning Sub-Committee meeting presentations or papers that were created prior to and during and after the manufacture and sale of the 1996 ZJ-Body, that document in any way the direct and formal communications between Chrysler LLC and its dealerships.

All Product Planning Committee (PPC) meeting presentations or papers that were created prior to and during and after the manufacture and sale of the 1996 ZJ-Body, that document in any way the direct and formal communications between Chrysler LLC and its dealerships.

RESPONSE NO. 1: Chrysler Group objects to this request as untimely given the fact that the discovery cut-off was June 29, 2012 as set forth in Judge Rand's Order of April 16, 2012. Further, as Plaintiff's counsel repeatedly stated in her Motion for Spoliation Sanctions to Bar the Expert Report of Jack B. Ridenour, in granting the motion to extend the discovery deadline, the extension was "not a carte blanche to engage in broad initial discovery, this is a focused thing... We've set the fences." Plaintiff's Brief in Support of Motion, pp. 3 and 4. Counsel for Plaintiff further stated that, "with the goal of limiting discovery, [Judge Rand] and counsel discussed those specific things that needed to be completed in the case which included: the deposition of Robert Banta, the depositions of plaintiff's experts, and the deposition of someone knowledgeable about the sales and servicing of Jeep Grand Cherokees." Plaintiff's Brief in Support of Motion, p. 5. Furthermore, the April 16, 2012 Order extending the discovery deadline was specifically limited to the categories of discovery as stated above, in addition to requiring the continued deposition of David Dillon. Accordingly, Chrysler Group further objects to this discovery, which seeks ten broad categories of documents, because it goes beyond the narrow discovery permitted by the Court's Order of April 16, 2012.

Without waiving any objection, after reasonable and diligent search and inquiry, Chrysler Group has not located 10-panel, 11-panel, and/or 12-panel charts that were created prior to and during the manufacture and sale of the 1996 Jeep Grand Cherokee (ZJ). Further, after reasonable and diligent search and inquiry, Chrysler Group has not located documents generated by any "Product Planning Committee" or "Product Planning Sub-Committee" such as those sought in this request.

Chrysler Group further objects to this request as overly broad, unduly burdensome, and because it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

REQUEST NO. 2: Please provide the following then-projected financial data and/or actual historical financial data, which was created prior to and documented during the manufacture and sale of the 1996 ZJ-Body vehicle which was marketed as the Jeep Grand Cherokee, by the now-bankrupt Chrysler LLC:

Tracked Vehicle Cost

Tracked Vehicle Gross Variable Margin

Tracked Vehicle Net Margin

Average Vehicle Cost

Average Vehicle Gross Variable Margin

Average Vehicle Net Margin

Tracked Vehicle Dealership Delivered Cost

Tracked Vehicle Dealership Gross Variable Margin

Tracked Vehicle Dealership Net Margin
Average Vehicle Dealership Delivered Cost
Average Vehicle Dealership Gross Variable Margin
Average Vehicle Dealership Net Margin
Base Model Dealership 'Base Price'
Tracked Vehicle MSRP
Average Vehicle MSRP
'Showroom Typical' MSRP

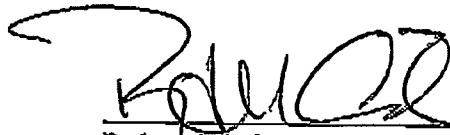
RESPONSE NO. 2: Chrysler Group objects to this request as untimely given the fact that the discovery cut-off was June 29, 2012 as set forth in Judge Rand's Order of April 16, 2012. Further, as Plaintiff's counsel repeatedly stated in her Motion for Spoliation Sanctions to Bar the Expert Report of Jack B. Ridenour, in granting the motion to extend the discovery deadline, the extension was "not a carte blanche to engage in broad initial discovery, this is a focused thing... We've set the fences." Plaintiff's Brief in Support of Motion, pp. 3 and 4. Counsel for Plaintiff further stated that, "with the goal of limiting discovery, [Judge Rand] and counsel discussed those specific things that needed to be completed in this case which included: the deposition of Robert Banta, the depositions of plaintiff's experts, and the deposition of someone knowledgeable about the sales and servicing of Jeep Grand Cherokees." Plaintiff's Brief in Support of Motion, p. 5. Furthermore, the April 16, 2012 Order extending the discovery deadline was specifically limited to the categories of discovery as stated above, in addition to requiring

the continued deposition of David Dillon. Accordingly, Chrysler Group further objects to this discovery, which seeks 16 broad categories of documents, because it goes beyond the narrow discovery permitted by the Court's Order of April 16, 2012.

Chrysler Group also objects to this request as vague, overly broad, unduly burdensome, and because it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

Dated: July 24, 2012

GOLDBERG SEGALLA LLP



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