

Discovery Ex. No. 555
Cause No. 7824*JG99

LeCompte

STATE OF MICHIGAN

IN THE CIRCUIT COURT FOR THE COUNTY OF OAKLAND

CHRYSLER CORPORATION,
a Delaware corporation,

Plaintiff,

vs.

PAUL SHERIDAN,

Defendant.

NO. 94-489177-CZ

Hon. Edward Sosnick

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AFFIDAVIT OF STUART N. DOWDY

STATE OF MICHIGAN)
COUNTY OF OAKLAND) ss

STUART N. DOWDY, being first duly sworn, deposes and
states as follows:

1. My name is Stuart N. Dowdy, and I am a partner in
the law firm of Pitt, Dowdy & McGehee.

2. Our office received a telephone call from Gregory Ridella on Tuesday, December 27, 1994. We received the call sometime in the afternoon of December 27, 1994. I talked to Mr. Ridella and was informed of the following:

- A. Paul Sheridan was being discharged as of that date (12/27/94).
- B. Chrysler had filed a lawsuit in the Oakland County Circuit Court and the case had been assigned to Judge Sosnick.
- C. Chrysler was claiming that Paul Sheridan had disclosed confidential and proprietary information.
- D. Chrysler was seeking the return of certain documents and papers in Paul Sheridan's possession.
- E. In addition to filing its complaint, Chrysler was seeking a temporary restraining order to restrain Paul Sheridan from further disclosure or from using any of the documents in his possession.
- F. That Chrysler attorneys, Joseph Marshall and Charles Clippert were at the Oakland County Circuit Courthouse, and that they would present their request for a temporary restraining order to Judge Kilda Gage at approximately 4:00 P.M. that day.

3. I told Mr. Ridella that Michael Pitt was out of the country on vacation, and also that Mr. Sheridan was out of town and we could not contact him immediately. I requested that these matters be postponed until Mr. Pitt was available.

4. Mr. Ridella informed me that Chrysler would not postpone their proceedings or their request for a temporary restraining order.

5. Approximately one hour after talking to Mr. Ridella, I received a telephone call from Mr. Charles Clippert, who indicated he was at the Oakland County Circuit Courthouse, and seeking a temporary restraining order.

6. Mr. Clippert read to me over the telephone the proposed language of the restraining order. I indicated to him the proposed temporary restraining order included provisions which would be impossible to implement due to the fact that both Mr. Pitt and Mr. Sheridan were unavailable.

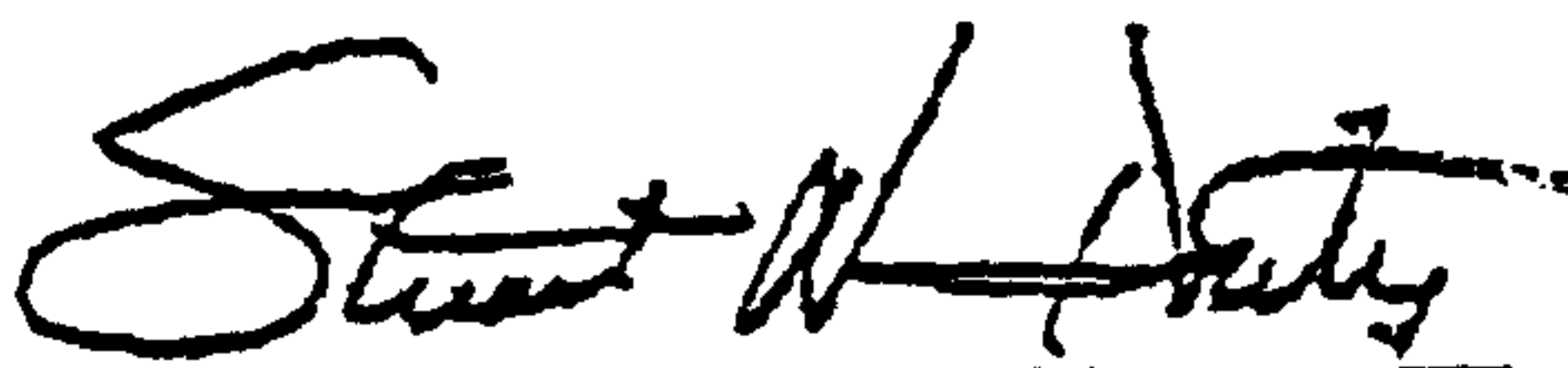
7. Mr. Clippert indicated that he would revise or drop some of this language in his proposed temporary restraining order.

8. The copy of the restraining order that I saw subsequently included language which Mr. Clippert had told me in our telephone conversation that he was going to drop or withdraw from his request.

9. I contemporaneously made notes of my telephone conversation with Gregory Ridella which confirmed that at that time Mr. Ridella informed me the case had been assigned to Judge Scznick.

10. On Thursday morning, December 29, 1994, our office received a faxed copy of a notice for deposition of Paul Sheridan from Joseph C. Marshall. The notice indicated it had been faxed to our office at approximately 7:30 P.M., on December 28, 1994.

11. I responded to Mr. Marshall's notice of deposition by letter, sent via Fax, on December 29, 1994. A copy of my letter of December 29, 1994, is attached to this affidavit as exhibit 1.


STUART N. DOHERTY

Subscribed and sworn to before me
this 10th day of February, 1995


PATRICIA A. GIERCK, Notary Public
My Commission expires: 6/30/96