

**Gonzalez, et al. vs. Chrysler**

**Gregory J. Ridella**

**November 11, 1996**

**Freelance Court Reporters (810) 779-1800**

1 IN THE UNITED STATES DISTRICT COURT  
2 FOR THE SOUTHERN DISTRICT OF TEXAS  
3 CORPUS CHRISTI DIVISION

4 LUIS GONZALEZ, INDIVIDUALLY,  
5 AND AS NEXT FRIEND OF MARIA  
6 GONZALEZ, AN INCAPACITATED  
7 PERSON, AND LUIS ANTONIO  
8 GONZALEZ, MARY LOU GONZALEZ,  
9 AND MELISSA GONZALEZ, MINORS,  
10 AND JESUS HERNANDEZ, MEMO  
11 HERNANDEZ, MARCELO HERNANDEZ  
12 AND MARIA BELEN PENA,  
13 Plaintiffs,  
14 vs. Civil Action  
15 CHRYSLER CORPORATION, No. C-95-470  
16 Defendant  
17 vs.  
18 MARTIN HERNANDEZ AND  
19 ENEDELIA RAMIREZ,  
20 Third-Party Defendants.

21 THE DEPOSITION OF  
22 GREGORY J. RIDELLA  
23 November 11, 1996  
24  
25

Page 4

1 The telephonic videotaped deposition  
2 of GREGORY J. RIDELLA, a witness in the above-entitled  
3 matter, taken before Melinda S. Moore, (CSR-2258), a  
4 Notary Public, at 5445 Corporate Drive, Suite 250,  
5 Troy, Michigan, on November 11, 1996, commencing at or  
6 about 9:26 a.m.

7 APPEARANCES:  
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14 Appearing on behalf of Defendant  
15 Chrysler Corporation  
16 Chrysler Corporation  
17 Office of the General Counsel  
18 BY: RITA A. BURNS  
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20 Auburn Hills, Michigan 48326  
21 Appearing on behalf of Defendant  
22 Chrysler Corporation

23 VIDEO TECHNICIAN: Tim Reitman, Reitman Video  
24 Specialists (810) 344-4271  
25

Page 2

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7 APPEARANCES:  
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14 (Present in Corpus Christi, Texas)  
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Chrysler Corporation

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1 No. 37,346

2 JOHN AND TAMMY MATTHEWS,  
3 INDIVIDUALLY AND AS  
4 NEXT FRIEND FOR STEVI  
5 WESTON, A MINOR  
6 VS.  
7 CARLAS ORTIZ SMITH, ELKHART  
8 INDEPENDENT SCHOOL DISTRICT,  
9 CHRYSLER CORPORATION, AND  
10 ROGER CONN CHRYSLER-DODGE-  
11 PLYMOUTH-JEEP-EAGLE, INC. ) ANDERSON COUNTY, TEXAS

12 IN THE JUDICIAL  
13 DISTRICT COURT OF

14 THE DEPOSITION OF  
15 GREGORY J. RIDELLA  
16 November 11, 1996  
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Page 3

1 STATE OF MICHIGAN  
2 IN THE CIRCUIT COURT FOR THE COUNTY OF WAYNE  
3

4 MARCIA TREAT and DAVID TREAT,  
5 Individually and DAVID TREAT  
6 as Next Friend of JEFFREY TREAT  
7 and KEVIN TREAT, Minors,  
8 Plaintiffs,  
9 vs. No. 94-433467-WP  
10 CHRYSLER CORPORATION, a  
11 Michigan corporation,  
12 Defendant.

13 THE DEPOSITION OF  
14 GREGORY J. RIDELLA  
15 November 11, 1996  
16  
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I N D E X

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3	<u>WITNESS:</u>	<u>PAGE:</u>
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1 A Gregory, middle initial J, Ridella,  
2 R-i-d-e-l-l-a.  
3 Q Mr. Ridella, what do you do for a living?  
4 A I'm an attorney for Chrysler Corporation.  
5 Q How long have you worked for Chrysler  
6 Corporation?  
7 A Sixteen years.  
8 Q Hello.  
9 A Sixteen years, Mikal.  
10 Q Oh, okay. What is your present position within  
11 the Chrysler Corporation?  
12 A My present position is senior staff counsel.  
13 Q Who is your immediate supervisor?  
14 A Steven B. Hantler, H-a-n-t-l-e-r.  
15 Q And what area of responsibility do you have  
16 within the Office of General Counsel of Chrysler  
17 Corporation?  
18 A I'm responsible for providing legal advice and  
19 counsel to the personnel department and the  
20 employee benefits department.  
21 Q Do you have any involvement with product  
22 liability litigation?  
23 A I do not.  
24 Q Except for serving as a witness?  
25 A This one time, yes.

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E X H I B I T S

1	
2	Deposition Exhibit No. 1
3	Information Sheet re: FSNCTC19
4	Deposition Exhibit No. 2
5	7/14/95 Letter to Thomas G. Kienbaum
6	from Courtney E. Morgan, Jr.
7	Re: Chrysler vs. Sheridan
8	Deposition Exhibit No. 3
9	Chrysler vs. Sheridan
10	Affidavit of Dennis C. Malecki
11	Deposition Exhibit No. 4
12	Chrysler vs. Sheridan
13	Affidavit of Richard A. Winter
14	Deposition Exhibit No. 5
15	Chrysler vs. Sheridan
16	Deposition of Paul V. Sheridan
17	7/26/95
18	Pages 1 through 28
19	Deposition Exhibit No. 6
20	Chrysler vs. Sheridan
21	Deposition of Paul V. Sheridan
22	7/26/95
23	Pages 25 through 28
24	Deposition Exhibit No. 7
25	Chrysler vs. Sheridan
	Affidavit of Henri LaFrance

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1 Q Okay, Mr. Ridella, I want to take you back to  
2 the fall of 1994. When were you first contacted  
3 about a Chrysler employee by the name of Paul  
4 Sheridan?  
5 A I was contacted on December the 21st, 1994.  
6 Q Is that the first time you even knew that a  
7 gentleman by the name of Paul Sheridan existed?  
8 A No, it is not.  
9 Q And when is the first time that you knew of Paul  
10 Sheridan?  
11 A Probably around 1990.  
12 Q Okay. Now, when you were contacted on December  
13 the 21st of 1994, what did you begin to do?  
14 A I was contacted to attend a meeting on that date,  
15 and I cleared my calendar so that I could attend  
16 that meeting on that date.  
17 Q Who was present at this meeting?  
18 A Present was a Mr. Paul Smuts (phonetic), Dick  
19 Winter, Jerry Miller, John Fonger, and Joseph  
20 Marshall.  
21 Q Where was this meeting held?  
22 A It was held in Highland Park, Michigan at the  
23 Chrysler World Headquarters.  
24 Q What conference room?  
25 A I can't recall, Mikal.

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Troy, Michigan  
November 11, 1996  
\* \* \* \* \*

VIDEO TECHNICIAN: Today's date is  
November the 11th, 1996, and we're on the record  
at 9:26 a.m. This is the video deposition of  
Gregory Ridella. We're at the law offices of  
Oppenheimer Wolff & Donnelly in Troy, Michigan.  
Counsel, can you put your appearance  
on the record, please.  
MR. WATTS: My name is Mikal Watts. I  
represent the Matthews plaintiffs as well as the  
Gonzalez plaintiffs.  
MR. MILLER: Eric Miller on behalf of  
Chrysler Corporation.  
VIDEO TECHNICIAN: Can the witness be  
sworn, please.  
\* \* \* \* \*

GREGORY J. RIDELLA  
after having been first duly sworn by the Notary  
Public, was examined and testified on his oath as  
follows:

EXAMINATION

BY MR. WATTS:  
Q Name, please?

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1 Q What time was it held on the 21st?  
2 A I believe it was in the afternoon.  
3 Q Who called the meeting?  
4 A I don't know but I was asked to attend by Mr.  
5 Paul Smuts.  
6 Q Who is Mr. Paul Smuts? What is his position at  
7 Chrysler?  
8 A Mr. Smuts presently is the executive director of  
9 personnel.  
10 Q We he the executive director of personnel in  
11 December of 1994?  
12 A I don't recall.  
13 Q Okay. Was he one of your -- well, strike that.  
14 Mr. Winter, what was his position in  
15 December of 1994?  
16 A I believe that he was the general manager of  
17 Minivan Operations.  
18 Q Mr. Jerry Miller?  
19 A Jerry Miller was the manager of Security  
20 Operations.  
21 Q John Fonger?  
22 A John Fonger to the best of my recollection was a  
23 security investigator at that time.  
24 Q And Joseph Marshall?  
25 A Joseph Marshall was an attorney at the Dickinson,

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1 Wright law firm.  
 2 Q Mr. Ridella, I have been given the representation  
 3 by Chrysler's counsel, Mr. Miller, that the only  
 4 subject that you are going to testify on is the  
 5 maintenance of Paul Sheridan's files from the  
 6 time that they were taken from his office to the  
 7 present. Is that your understanding of your  
 8 involvement in this case?  
 9 A In this case, or -- in this deposition, you mean?  
 10 Q Yes.  
 11 A Yes.  
 12 Q All right.  
 13 MR. WATTS: Mr. Miller?  
 14 MR. MILLER: Yes, sir.  
 15 MR. WATTS: Is that an agreement that  
 16 we have, or do I need to just probe and probe and  
 17 probe all day long? Or can I limit my questions  
 18 to that particular subject with the knowledge  
 19 that he will not be asked questions outside of  
 20 that subject at the time of trial?  
 21 MR. MILLER: If I understand your  
 22 question, Mr. Ridella's purpose here is to  
 23 testify regarding the custody and control of the  
 24 files maintained by Mr. Paul Sheridan.  
 25 MR. WATTS: Okay. And he will not be

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1 offered at the time of trial on any other  
 2 subjects?  
 3 MR. MILLER: That is my understanding,  
 4 yes.  
 5 MR. WATTS: Okay. And with that  
 6 understanding, I will limit my questions to that  
 7 particular subject.  
 8 Q (BY MR. WATTS: Mr. Ridella, when were the files  
 9 taken out of Mr. Sheridan's office?  
 10 A To the best of my recollection, they were removed  
 11 on December the 19th, 1994.  
 12 Q And when was Mr. Sheridan's office locked to  
 13 prevent others from gaining egress to it?  
 14 A Mr. Sheridan worked in an area, a cubicle area.  
 15 He did not have an office with a locked door.  
 16 Q Okay. All right. And so on December the 19th,  
 17 his files were removed from that cubicle area?  
 18 A That is correct.  
 19 Q And by whom were his files removed?  
 20 A The files were boxed by a Mr. Roger Stogran  
 21 (phonetic) -- I can't spell his last name -- and  
 22 a Miss Nancy Ray. Nancy Ray was the director of  
 23 -- pardon me, the manager of the personnel  
 24 function and she had ordered Mr. Stogran to begin  
 25 the boxing of Sheridan's records and the

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1 transportation of those records to a security  
 2 location within the Auburn Hills Technology  
 3 Center where Mr. Sheridan worked.  
 4 Q Okay. So on December the 19th, Mr. Stogran and  
 5 Mrs. Ray boxed up his files and they transported  
 6 them to a security location within the Chrysler  
 7 Technical Center in Auburn Hills, Michigan?  
 8 A Yes, and that was with the assistance of a Mr.  
 9 Brian Bradley who was the manager of Security  
 10 Operations at the Auburn Hills Technology Center.  
 11 Q Okay. At the time that this procedure was taking  
 12 place, were you aware that it was happening?  
 13 A No, I was not.  
 14 Q Okay. When were you first made aware that Mr.  
 15 Sheridan's files had been taken from his office?  
 16 A To the best of my recollection, early January of  
 17 1995.  
 18 Q And how was it that you first became aware that  
 19 Mr. Sheridan's files had been removed from his  
 20 office?  
 21 A I can't recall, Mikal.  
 22 Q Okay. Now, Mr. Sheridan had a computer in his  
 23 office; is that correct?  
 24 A Yes, he did.  
 25 Q Did that computer have software in it?

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1 A I can't recall.  
 2 Q That computer had disks with information content  
 3 in it?  
 4 A There were computer disks found among the effects  
 5 of Mr. Sheridan, and those were placed in storage  
 6 also in the security area, yes.  
 7 Q Who placed the computer disks found within Mr.  
 8 Sheridan's office in storage?  
 9 A All of Mr. Sheridan's effects, his documents, any  
 10 disks that were found were placed in storage by  
 11 Mrs. Ray and Mr. Stogran, again, with the  
 12 assistance of Mr. Brian Bradley.  
 13 Q Mr. Ridella, is it your sworn testimony under  
 14 oath that nobody accessed his files?  
 15 A At what time period, sir?  
 16 Q At any time period.  
 17 A Access was obtained to Mr. Sheridan's files at my  
 18 direction and also it occurred at one other time  
 19 prior to my involvement that I'm familiar with.  
 20 Q All right. Let's talk about those two times.  
 21 And by the way, in that last answer when you said  
 22 access to his files, I didn't ask you the  
 23 question but we were both talking about  
 24 computerized files, right? Hello.  
 25 A Computerized files --

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1 Q In other words, that last question that I asked  
 2 you is when were his files accessed. I meant  
 3 computerized files or data from his computer. Is  
 4 that what you meant by your answer?  
 5 A No, I meant -- I meant generally, all his files.  
 6 Q Okay. Let's split it up for a second. With  
 7 regard to your general answer about access was  
 8 obtained on two occasions, once at your direction  
 9 and once before the materials were taken from his  
 10 office, you talked about that in the context of  
 11 his files generally; is that right?  
 12 A That's correct.  
 13 Q Before the files were removed from his office,  
 14 who had access to them?  
 15 A Like I said, the files were removed and placed in  
 16 storage on December the 19th of 1994, placed in  
 17 storage in a storage facility in the Auburn Hills  
 18 Technology Center, security department, and to  
 19 the best my recollection and knowledge, nobody  
 20 had access to those documents until early part of  
 21 January of 1995.  
 22 Q All right. In the early part of January of 1995,  
 23 who had access to the documents?  
 24 A I understand that Mr. Dennis Malecki, who was  
 25 Paul Sheridan's supervisor, and Dick Winter, who

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1 was Mr. Malecki's supervisor, obtained access to  
 2 Mr. Sheridan's files by entering the locked  
 3 security room where the files were stored.  
 4 Q And who was with them?  
 5 A Mr. Brian Bradley was the manager of the function  
 6 -- of the Security Operations, I believe opened  
 7 the facilities for them and Mr. Malecki and Mr.  
 8 Winter were alone in the room.  
 9 Q And for what reason were Mr. Malecki and Mr.  
 10 Winter allowed into the secured room to access  
 11 Mr. Sheridan's files in early January of 1995?  
 12 A Mr. Winter informed me that he went into the  
 13 security room for the purpose of determining what  
 14 was Chrysler's property and what was Mr.  
 15 Sheridan's property. He and Mr. Malecki made  
 16 some markings on the boxes in which the documents  
 17 were stored and then they left the room.  
 18 They also located some Federal Express  
 19 air bills which they handed to Mr. John Fonger  
 20 who was present outside the room.  
 21 Q Were any documents removed from the files at that  
 22 time?  
 23 A Mr. -- Mr. Fonger had removed the Federal Express  
 24 air bills from the room -- He took them with him  
 25 after he had been handed those by Mr. Winter and

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1 Mr. Malecki.  
 2 Q Okay. When was the next time somebody was  
 3 granted access to those files?  
 4 A I became aware that Mr. Malecki and Mr. Winter  
 5 had obtained access to the room shortly  
 6 thereafter, and at that point in time I  
 7 instructed Mr. Fonger that no individual would be  
 8 gaining access to that room at the security  
 9 office except through my permission.  
 10 Q Mr. Malecki and Mr. Winter did not have your  
 11 permission to access the files in early January  
 12 of 1995; isn't that correct?  
 13 A That is -- that is correct, they did not seek my  
 14 permission, yes.  
 15 Q And Mr. Malecki and Mr. Winter who were -- they  
 16 were both in the Minivan Operations; is that  
 17 right?  
 18 A They were Paul Sheridan's superiors.  
 19 Q And Mr. Malecki and Mr. Winter obtained access to  
 20 Paul Sheridan's files in early January of 1995  
 21 both without your permission and without your  
 22 knowledge; is that correct?  
 23 A That is correct.  
 24 Q Now, how many days after they had been in this  
 25 room did you learn that they had been there?

Page 20

1 A I think it was three days.  
 2 Q And on the same day that you learned that they  
 3 had been in this room without your knowledge and  
 4 without your permission, you issued the  
 5 instruction to Mr. Fonger that from here on out,  
 6 nobody else was going to be allowed in that room  
 7 without your express permission; is that right?  
 8 A That is correct.  
 9 Q Was the access to the files by Mr. Malecki and  
 10 Mr. Winter in early January of 1995, which was  
 11 done without your permission and without your  
 12 knowledge, was it videotaped?  
 13 A I don't know.  
 14 Q Well, to your knowledge, was it videotaped?  
 15 A I don't think it was.  
 16 Q All right. You haven't seen any such videotape  
 17 of that entrance to the files by Mr. Sheridan's  
 18 supervisors, Mr. Malecki and Mr. Winter, who were  
 19 both with Minivan Operations?  
 20 A That is correct, I have not seen any videotape.  
 21 Q Well, does Chrysler have videotape equipment at  
 22 its disposal?  
 23 A I believe it does. We have a graphics  
 24 department.  
 25 Q Okay. And did anybody ever ask Mr. Malecki and

Page 21

1 Mr. Winter why they didn't videotape their access  
 2 to these very sensitive files?  
 3 A I don't know.  
 4 Q You never did?  
 5 A I never did.  
 6 Q Okay. After Mr. Malecki and Mr. Winter accessed  
 7 the files in early January of 1995 without your  
 8 knowledge and without your permission, three days  
 9 later you issued an order to Mr. Fonger, a  
 10 security man, that nobody was to access the files  
 11 without your permission, correct?  
 12 A That is correct.  
 13 Q And subsequent to that point in time, did you  
 14 ever go into the room where these files were to  
 15 check and see whether the same amount of files  
 16 that were taken out by Mr. Stogran and Mr. (sic)  
 17 Ray were still present?  
 18 A I went into the room probably in the latter part  
 19 of February, early part of March of 1995.  
 20 Q And in late February, early March of 1995, who  
 21 did you go into the room with the Sheridan  
 22 documents with?  
 23 A I went into the room with our outside counsel for  
 24 the purpose of beginning a process of  
 25 inventorying the documents.

Page 22

1 Q And with outside counsel, that would be the  
 2 Dickinson, Wright firm?  
 3 A That is correct.  
 4 Q And would that include Mr. Marshall?  
 5 A He was not present.  
 6 Q Who was present from the Dickinson, Wright firm  
 7 when you went into the room with the Sheridan  
 8 documents in late February, early March of 1995?  
 9 A I believe that it was Mr. Charles Clippert.  
 10 Q Mr. Charles Clippert. And Mr. Clippert works for  
 11 Dickinson, Wright?  
 12 A Yes, he does.  
 13 Q All right. And so was it just the two of you?  
 14 A I don't recall.  
 15 Q Well, were you there?  
 16 A I was there.  
 17 Q Was Mr. Clippert there?  
 18 A I believe that he was, yes.  
 19 Q Was anybody else there?  
 20 A Others could have been because we were beginning  
 21 a process of inventorying the documents and  
 22 others were present with us.  
 23 Q Who else was there?  
 24 A We had selected three individuals to begin an  
 25 inventorying process. When I say we, Mr.

Page 23

1 Clippert and myself, and that was a Miss  
 2 Catherine Moran, a Mr. Charles Murphy, and a  
 3 Sharon Vasher.  
 4 Q Catherine Moran worked where?  
 5 A She's in the security department in the Chrysler  
 6 Highland Park facility.  
 7 Q Mr. Charles Murphy, where does he work or where  
 8 did he work?  
 9 A He is a -- he is presently and at the time was a  
 10 security supervisor working for Mr. Bradley at  
 11 the Auburn Hills Technology Center.  
 12 Q And Sharon Vasher?  
 13 A She is a paralegal working for the Dickinson,  
 14 Wright law firm.  
 15 Q Okay. And so -- by the way, in January of 1995  
 16 when Mr. Malecki and Mr. Winter went into the  
 17 room with the Sheridan documents without your  
 18 knowledge or consent, did anybody at Chrysler  
 19 invite Mr. Sheridan or his legal counsel to be  
 20 present to make sure that nothing was done  
 21 untoward toward the file?  
 22 A Mr. Sheridan was not invited.  
 23 Q Was Mr. Sheridan's legal counsel invited?  
 24 A No, they were not.  
 25 Q And in early February or -- strike that.

Page 24

1 In late February and early March of  
 2 1995, when yourself, Mr. Clippert, perhaps Ms.  
 3 Moran, Mr. Murphy and Miss Vasher, the Chrysler  
 4 representatives and the Dickinson, Wright  
 5 representatives went into this room with the  
 6 Sheridan files, did anybody invite Mr. Sheridan  
 7 or his legal counsel to observe to insure that  
 8 nothing untoward happened towards the files?  
 9 A I want to clarify for you, Mr. Watts, the purpose  
 10 of that document review in late February, early  
 11 March.  
 12 Q Well, why don't you answer the question first and  
 13 then I'll ask you the question of the purpose.  
 14 A They were not present.  
 15 Q All right. Was anybody -- did anybody inform  
 16 them that people were about to go into the files  
 17 and perform an inventory?  
 18 A Yes, they were aware of that.  
 19 Q Okay. Was any videotape taken of the  
 20 inventorying process?  
 21 A No, there was not.  
 22 Q Okay. Now, how long did this inventorying  
 23 process in late February, early March take place?  
 24 A I can't recall exactly, Mr. Watts, but it was a  
 25 lengthy process, a couple days.

Page 25

1 Q Now, at the time that this inventorying process  
2 took place in late February, early March, were  
3 you aware that Chrysler was under an order by a  
4 state district judge in Tampa, Florida not to  
5 disturb the files?  
6 A I was unaware of any order from a court in Tampa,  
7 Florida.  
8 Q At the time that you all performed this inventory  
9 in late February, early March of 1995, were you  
10 aware of any orders across the country  
11 prohibiting Chrysler from disturbing the Sheridan  
12 files?  
13 A No, I was not.  
14 Q Okay. Prior to the inventorying of the Sheridan  
15 documents in late February, early March of 1995,  
16 had you had any discussions with anybody in the  
17 Office of General Counsel defending product  
18 liability cases against the Chrysler minivan?  
19 A No, I did not.  
20 Q Okay. So I take it that prior to February, early  
21 March of 1995, nobody in the Office of General  
22 Counsel had informed you of any orders with  
23 regard to the Sheridan files concerning the  
24 Chrysler minivan product liability liftgate latch  
25 litigation?

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1 A I can't recall any discussions.  
2 Q Okay. When you said that the inventorying  
3 process took quite a while, how many -- are we  
4 talking about several days or several weeks?  
5 A I think I said it took two days, a couple days.  
6 That's my recollection of it.  
7 Q All right. And at the end of the couple days,  
8 was the room locked up again?  
9 A Yes, it was.  
10 Q All right. And would the inventorying process  
11 that took place between Chrysler's security  
12 personnel, yourself and Chrysler outside counsel,  
13 the Dickinson, Wright firm -- prior to that  
14 inventory, had anybody done an inventory of the  
15 Sheridan files?  
16 A Let me clarify, Mr. Watts, that I and Mr.  
17 Clippert were not doing the inventorying, which  
18 your question had implied. The inventorying was  
19 done by the three individuals I mentioned  
20 earlier.  
21 Q That's a fair qualification. Let me see if I  
22 can't go about it this way. During the process  
23 that took two days of inventorying the files, did  
24 you watch the process to make sure that no  
25 documents had been taken away?

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1 A I was there for part of the process.  
2 Q But you were not there for all of the process?  
3 A That's correct.  
4 Q And the process was not videotaped?  
5 A It was not videotaped.  
6 Q Okay. Now, prior to this process of the  
7 inventorying of files in late February, early  
8 March of 1995, had anybody else gone in and  
9 inventoried the documents to document what it was  
10 that was in the files?  
11 A No, I gave nobody permission to go into the  
12 office area and to inventory the documents.  
13 Q Well, when Mr. Winter and Mr. Malecki went in  
14 there without permission, did they inventory the  
15 files?  
16 A They did not inventory the files. They made  
17 markings on the doc -- on the boxes to the best  
18 of their knowledge of what was Chrysler property  
19 and what was Sheridan property.  
20 Q Okay. Subsequent to the late February, early  
21 March of 1995 inventorying process that you've  
22 described for me, when was the next time somebody  
23 was allowed into the room with the Sheridan  
24 files?  
25 A The next incident occurred or next event occurred

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1 in late part of March of 1995 when the documents  
2 were transported.  
3 Q Where were the documents transported in late  
4 March of 1995?  
5 A Well, After the inventorying was completed in  
6 March, early March of 1995 -- again, let me  
7 clarify, at the request of a court here in  
8 Michigan -- we transported the documents. The  
9 documents were transported at my direction, I  
10 should say, from the locked security area at the  
11 Auburn Hills Technology Center to a locked room  
12 in the General Counsel's office in Highland Park,  
13 Michigan, which at the time was where Chrysler's  
14 World Headquarters was.  
15 Q Where was the locked room at the Office of  
16 General Counsel located?  
17 A It was located in the area where I work, where I  
18 worked, I should say, at the -- again, at our  
19 Highland Park headquarters in Highland Park,  
20 Michigan.  
21 Q Who had the key to the locked room?  
22 A I did.  
23 Q Anybody else?  
24 A Nobody else did.  
25 Q Anybody access those files during the time that

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1 they were in the locked room?  
2 A Yes, there were other occasions.  
3 Q Okay. Let's talk about those. Tell me the first  
4 time that somebody accessed the Sheridan files in  
5 the locked room at Chrysler's Office of General  
6 Counsel in Highland Park.  
7 A I can't recall the first time, Mr. Watts, but I  
8 remember that Mr. Sheridan and his lawyers came  
9 in April of 1995 to review the documents, and  
10 that they came two or three times in April of  
11 1995. When they came at that time I had  
12 authorized the moving of the documents from the  
13 locked room to a conference room next door to  
14 that room so that they had more space to review  
15 the documents.  
16 Q You told me you could not recall the first time  
17 that somebody accessed the files from the locked  
18 room at the Office of General Counsel. Prior to  
19 Mr. Sheridan's lawyers arriving to look at the  
20 files, did anybody access that locked room?  
21 A I can't recall, Mr. Watts, if after the boxes  
22 were taken to Highland Park, transported to  
23 Highland Park, if the Dickinson, Wright lawyers  
24 came to look at the documents before Mr. Sheridan  
25 and his lawyers arrived or afterwards, but they

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1 did look at the documents.  
2 Q Mr. Ridella, was any log kept as to who went in  
3 and who went out of that room?  
4 A I don't have a log but I've got a very good  
5 recollection of who was in the room.  
6 Q But you don't have a recollection as to when it  
7 took place?  
8 A I can't recall the exact dates right now.  
9 Q Who was in the room whenever it took place?  
10 A When what took place, sir?  
11 Q You told me you have a very good recollection of  
12 when it took place and I'm asking you, who was in  
13 the room?  
14 A I recall that Mr. Sheridan came in April of 1995  
15 with his attorneys, Mr. Morgan, and Mr. Mazur.  
16 When they were present on each of the three  
17 occasions, in the room with them was Mr. Scott  
18 Hamilton of Dickinson, Wright or Mr. Bob Brown of  
19 Dickinson, Wright, both attorneys at the firm, or  
20 there was a security official with them as well.  
21 Q Why were there Chrysler lawyers and a security  
22 official there when Mr. Sheridan and his lawyers  
23 were going through the Sheridan documents?  
24 A To observe.  
25 Q Why would you want them there to observe?

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1 A It seemed prudent at the time.  
 2 Q Prudent for what purpose, Mr. Ridella?  
 3 A Well, it seemed to me -- it seemed to all of us,  
 4 both myself and outside counsel, that -- to have  
 5 them present with the documents and with them  
 6 present as well was the right thing to do, so we  
 7 -- I must say that while they were present, Mr.  
 8 Morgan and Mr. Mazur, and Mr. Sheridan expressed  
 9 no objections.  
 10 Q Well, what I'm curious about is why did it seem  
 11 to be a prudent thing to do?  
 12 A Because I think it was just plain out prudent,  
 13 Mr. Watts. I can't think of a different way to  
 14 express myself other than to say that I think it  
 15 was -- I think that it was accomplished. We were  
 16 there, they were there at the time with the  
 17 lawyers and Mr. Sheridan, and it occurred.  
 18 Q You know, brushing my teeth every night is a  
 19 prudent thing to do but I have a purpose for  
 20 doing it, and that's to keep my teeth clean. And  
 21 you've established the fact that it was a prudent  
 22 thing to do, but why was it prudent? What was  
 23 the purpose of doing it?  
 24 MR. MILLER: Objection, repetitive.  
 25 It's asked and answered.

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1 Q (BY MR. WATTS): Go ahead, Mr. Ridella. Why  
 2 don't you try to give me a responsive answer.  
 3 MR. MILLER: Objection, argumentative.  
 4 He's already responded to the question twice.  
 5 Q (BY MR. WATTS): What was the purpose for having  
 6 Chrysler representatives and a Chrysler security  
 7 personnel there while Mr. Sheridan and his  
 8 lawyers went through Mr. Sheridan's files?  
 9 MR. MILLER: Objection, repetitive.  
 10 Q (BY MR. WATTS): Go ahead, sir.  
 11 THE WITNESS: Should I answer the  
 12 question?  
 13 MR. MILLER: If you have any different  
 14 answer, Mr. Ridella.  
 15 THE WITNESS: I have nothing more to  
 16 add.  
 17 Q (BY MR. WATTS): Are you going to answer that  
 18 question?  
 19 A I have.  
 20 MR. MILLER: Objection, argumentative.  
 21 He just did. He said he had nothing further to  
 22 add.  
 23 Q (BY MR. WATTS): Well, Mr. Ridella, let me go  
 24 back, because maybe I missed the answer. I'm not  
 25 trying to be argumentative with you.

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1 I think that we've established the  
 2 fact that you said it was a prudent thing to do.  
 3 You would agree with me there, right?  
 4 A Those were my words, yes.  
 5 Q Yeah. And what I'm trying to figure out is what  
 6 -- we've beat that dead horse and we all agree it  
 7 was a prudent thing to do. Now I'm trying to  
 8 figure out what was the purpose for doing it.  
 9 MR. MILLER: Objection, repetitive.  
 10 You have asked that question at least three  
 11 times.  
 12 Q (BY MR. WATTS): Go ahead, Mr. Ridella.  
 13 A Let me say this, Mr. Watts, I don't recall there  
 14 being any objection to the presence of the  
 15 Dickinson, Wright lawyers and the security  
 16 official in the room at the time that Mr.  
 17 Sheridan was present. They were there to  
 18 observe. They observed, and when Mr. Sheridan  
 19 and his lawyers were finished looking at whatever  
 20 they looked at, they left. The room was locked  
 21 -- the guard left, the lawyers left and the room  
 22 was locked, pure and simple.  
 23 Q No, I'm not insinuating there was an objection  
 24 necessarily. I'm just asking you what was the  
 25 purpose of those people observing.

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1 MR. MILLER: Objection, repetitive.  
 2 Q (BY MR. WATTS): Go ahead, sir.  
 3 THE WITNESS: Should I answer the  
 4 question?  
 5 MR. MILLER: If you have anything  
 6 further to add.  
 7 THE WITNESS: I have nothing more  
 8 really to add, Mr. Watts.  
 9 Q (BY MR. WATTS): So your answer to my question is  
 10 they were just there because it was prudent?  
 11 A That's correct, and to observe.  
 12 Q All right. Were you afraid that Mr. Sheridan and  
 13 his lawyers were going to remove documents from  
 14 the Sheridan files?  
 15 A I can't recall how I felt at the time.  
 16 Q Well, was that one of the purposes for having  
 17 people in the room, to make sure that a removal  
 18 of documents from the Sheridan files did not  
 19 occur?  
 20 A I don't recall that being discussed or thought  
 21 about at the time. I must say that the documents  
 22 did contain Chrysler information as well as some  
 23 Paul Sheridan effects, and so I think that they  
 24 were there just to observe and to see -- to see  
 25 again -- let me say this as well. The purpose --

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1 one of the purposes of that review by Sheridan  
 2 and his lawyers was to determine what was  
 3 Chrysler's and what was Sheridan's, and to the  
 4 extent that the attorneys could be of any  
 5 assistance in that process, they were there for  
 6 that purpose as well.  
 7 Q Well, you told me that one of the purposes of Mr.  
 8 Sheridan's review was to determine what was  
 9 Chrysler and what was Sheridan's. I believe you  
 10 used the exact same words from the standpoint of  
 11 Mr. Malecki's review and Mr. Winters review in  
 12 early 1995 which was done without your permission  
 13 and without your knowledge.  
 14 Now, my question to you is, can you  
 15 explain for the jury why in April of 1995  
 16 Chrysler felt that it was prudent to have  
 17 somebody from Chrysler watch Sheridan go through  
 18 the files but they didn't think it was prudent in  
 19 early 1995 for Sheridan and somebody from his  
 20 legal counsel to be present when Chrysler went  
 21 through the files?  
 22 A Well, let me say this, Mr. Watts, I am very  
 23 confident that Mr. Malecki and Mr. Winter went in  
 24 there for a very -- a very proper purpose, and  
 25 they went in there to look at the documents and

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1 to make an inventory of what was Sheridan's and  
 2 what was Chrysler's. They never went back into  
 3 the room after that event. When Paul Sheridan  
 4 came with his lawyers in 1995 to review the  
 5 documents, the purpose was under -- the purpose  
 6 was really to comply with a -- to give them, I  
 7 should say, an opportunity to look at the  
 8 documents and to make a determination of what was  
 9 Sheridan's and what was Chrysler's.  
 10 The latter review by Sheridan and his  
 11 lawyers was really something that we had invited  
 12 them to come and do and to attend. They came,  
 13 and we were there with them when they arrived. I  
 14 can't really explain to you -- I must say this to  
 15 you as well, that Mr. Sheridan was not  
 16 represented at the time of Malecki's review and  
 17 Winter's review by Mr. Morgan.  
 18 Q Mr. Ridella, you are an attorney licensed to  
 19 practice law in the State of Michigan; is that  
 20 right?  
 21 A I am.  
 22 Q You understand that when you give a deposition,  
 23 you are giving testimony under the penalty of  
 24 perjury?  
 25 A I'm aware of that.

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1 Q Correct?  
 2 A I am aware.  
 3 Q And you just testified that in early 1995, Mr.  
 4 Sheridan was not represented and that was one of  
 5 the reasons why his counsel were not permitted to  
 6 be present during the Malecki/Winter  
 7 unauthorized, unsupervised review of the  
 8 documents?  
 9 A No, I did not say that. I said that Mr. Sheridan  
 10 was not represented, to the best of my knowledge,  
 11 by Mr. Morgan at that time.  
 12 Q Well, he had counsel and you knew it because you  
 13 had already written a letter to his lawyer in  
 14 1994?  
 15 A I'm aware of that, yes.  
 16 Q All right. And so when you said that he was not  
 17 represented in your first answer, that wasn't  
 18 right, was it?  
 19 A I said by Mr. Morgan. That was my answer.  
 20 Q I think that was your clarification after you had  
 21 been caught.  
 22 MR. MILLER: Objection, argumentative.  
 23 Q (BY MR. WATTS): Let's get back to the question  
 24 that was at hand. Can you tell the jury why it  
 25 was prudent in April of 1995 for Chrysler to

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1 employ people to sit there and watch Sheridan's  
 2 lawyers figure out what was Chrysler and what was  
 3 Sheridan's, and yet they did not find it prudent  
 4 to allow Mr. Sheridan and his legal  
 5 representative to be present when Chrysler  
 6 employees, Malecki and Winter, went in there  
 7 without permission and without supervision?  
 8 MR. MILLER: Was that a question?  
 9 MR. WATTS: Yep.  
 10 MR. MILLER: That was the same  
 11 question that he's already responded to at  
 12 length; objection, repetitive.  
 13 Q (BY MR. WATTS): Go ahead, Mr. Ridella.  
 14 A I have nothing more really to add to the -- I  
 15 have nothing more really to add to the answer,  
 16 Mr. Watts.  
 17 Q Have you ever heard the phrase what's good for  
 18 the goose is good for the gander?  
 19 A I've heard of the phrase, yes.  
 20 Q Mr. Ridella, as I understand your testimony, you  
 21 were the person who is designated by Chrysler to  
 22 tell the jury that nothing happened to these  
 23 files between December of '94 and the time that  
 24 Sheridan finally got to look at them in April of  
 25 '95; is that right?

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1 A I testified, Mr. Watts, that I took control --  
 2 took control of the files and access to those  
 3 files starting in January of '95 through the time  
 4 that Mr. Sheridan had looked at the files in  
 5 April of '95 and beyond that date also.  
 6 Q All right. You cannot testify as to what  
 7 happened to the files when Mr. Malecki and Mr.  
 8 Winter looked through them, correct?  
 9 A I can testify as to what I understand that they  
 10 did.  
 11 Q Well, that would be hearsay as opposed to  
 12 something that you saw with your own eyes; is  
 13 that right?  
 14 A I did not observe them looking at those  
 15 documents, that is correct.  
 16 Q Okay. Now, I want to switch your attention from  
 17 the concept of paper files to the concept of  
 18 computer files. Now -- and I want for the next  
 19 series of questions for you to understand that  
 20 when I talk about files, I'm talking about  
 21 computer disks, information on hard disks or hard  
 22 drives, et cetera. Can we have that  
 23 understanding, sir?  
 24 A Yes.  
 25 Q Who was it that took the computer information out

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1 of Sheridan's office?  
 2 MR. MILLER: By that do you mean the  
 3 disks when you say computer information?  
 4 MR. WATTS: The information that came  
 5 out of his computer.  
 6 THE WITNESS: I remember that in  
 7 February -- late February of 1995 -- and by this  
 8 time, let me clarify that Sheridan's computer had  
 9 also along with his documents been stored in the  
 10 locked security room at the Auburn Hills  
 11 Technology Center. There was a need for a  
 12 computer by a department at the Auburn Hills  
 13 Technology Center. Mr. Malecki -- Mr. Winter had  
 14 a need or had Sheridan's computer available. It  
 15 was available. It was not in storage. And he  
 16 with my permission had requested an individual  
 17 named Henri LaFrance to download all the  
 18 information from Sheridan's computer onto  
 19 diskettes and that would, therefore, make the  
 20 computer available for use by another employee.  
 21 Q Now, Henri LaFrance -- LaFrance was working on  
 22 behalf of Chrysler and paid by Chrysler to do  
 23 this downloading, correct?  
 24 A He's a Chrysler employee, yes.  
 25 Q And Henri LaFrance is no longer a Chrysler

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1 employee; isn't that correct?  
 2 A I don't know, sir.  
 3 Q Do you know where Mr. LaFrance works?  
 4 A Not right now.  
 5 Q Have you talked to Mr. LaFrance?  
 6 A No, I have not.  
 7 Q Has he explained to you what he was asked to do?  
 8 A I personally did not talk to him.  
 9 Q Are you aware that not all of Sheridan's files  
 10 were in fact preserved?  
 11 A I'm not aware of that at all.  
 12 Q Are you aware as to whether Mr. LaFrance deleted  
 13 computer files and downloaded some others?  
 14 A I'm not aware of that at all. I know that Mr.  
 15 LaFrance was given instructions to download the  
 16 computer and that his -- I know that his actions  
 17 are spelled out in some detail in an affidavit  
 18 that he submitted in connection with his  
 19 activities.  
 20 Q Now, Mr. LaFrance downloaded Sheridan computer  
 21 data to a Chrysler file server location; isn't  
 22 that correct?  
 23 A I don't know, Mr. Watts.  
 24 Q Are you aware that Mr. LaFrance downloaded  
 25 Chrysler -- strike that.

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1 Are you aware that Mr. LaFrance  
 2 downloaded Sheridan computer files to file server  
 3 location FSNCTC19? Are you aware of that, sir?  
 4 A I don't have that kind of detail at hand.  
 5 Q Well, write that number down for me just for a  
 6 second, FSNCTC19. Do you have that, sir?  
 7 MR. MILLER: I have it.  
 8 MR. WATTS: All right. Ms. Moore --  
 9 COURT REPORTER: Yes.  
 10 MR. WATTS: Would you take a piece of  
 11 paper and write that down and slap exhibit  
 12 sticker No. 1 on it.  
 13 COURT REPORTER: Yes.  
 14 (Deposition Exhibit No. 1 marked  
 15 for identification.)  
 16 COURT REPORTER: I did it.  
 17 MR. WATTS: Hand exhibit sticker No. 1  
 18 to the witness, please.  
 19 Q (BY MR. WATTS): Now, Mr. Ridella, I want to talk  
 20 to you about locations for a second. Mr.  
 21 Sheridan's office where the files were originally  
 22 removed from in December of 1994 was at the  
 23 Chrysler Technical Center in Auburn Hills,  
 24 Michigan; is that right?  
 25 A That is correct.



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1 Q And you explained to me that on December the 19th  
2 of 1994, his files were removed from the Sheridan  
3 office in the CTC to a security location in the  
4 CTC; is that right?  
5 A Correct.  
6 Q And in early 1995 when Mr. Malecki and Mr. Winter  
7 went through those files, they went through the  
8 files at the security location in the Chrysler  
9 Technical Center in Auburn Hills, Michigan,  
10 correct?  
11 A Correct.  
12 Q Subsequent to the time that Mr. Malecki and Mr.  
13 Winter went through the files at the CTC, those  
14 files were moved to the Office of General Counsel  
15 location, which at the time was at Highland Park,  
16 Michigan?  
17 A Correct.  
18 Q And then they were put into a locked office and  
19 then -- did the inventory by -- that was  
20 authorized by yourself and Mr. Clippert take  
21 place at Highland Park or in Auburn Hills?  
22 A The inventorying was a direction from the judge  
23 in the Oakland County action, the case of  
24 Chrysler vs. Sheridan, and it took place at the  
25 Auburn Hills Technology Center.

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1 Q Okay. And then after that inventorying, the  
2 files were removed from Auburn Hills to Highland  
3 Park, the Office of General Counsel?  
4 A That is correct.  
5 Q Okay. Now, let's go back to the computer files  
6 for a second. Mr. Henri LaFrance was asked to  
7 download Sheridan computer data and I will  
8 represent to you that he did so to file server  
9 location FSNCTC19. With your understanding of  
10 Chrysler's computer situation, FSNCTC19 would be  
11 a file server location in what place?  
12 A I would not know that, sir.  
13 Q Well, do you see how it says CTC19?  
14 A I see that.  
15 Q CTC is the same initials as Chrysler Technical  
16 Center; is that correct?  
17 A CTC has stood in my mind as the Chrysler  
18 Technology Center, yes, for a number of different  
19 reasons.  
20 Q Okay. That's in Auburn Hills, Michigan; is that  
21 right?  
22 A That's correct.  
23 Q And so Mr. Henri LaFrance who no longer works for  
24 Chrysler was asked to download computer files to  
25 a file server location in Auburn Hills, Michigan,

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1 correct?  
2 A First of all, I don't know where Mr. LaFrance  
3 works, if he's working for Chrysler or not right  
4 now, but he was given direction to download the  
5 computer.  
6 Q Mr. LaFrance is not working for Chrysler. He  
7 works in Ohio now.  
8 Did you ever have any discussions with  
9 Mr. LaFrance, ever?  
10 A Personally, no.  
11 Q Okay. Now, who are you aware of that had  
12 discussions with Mr. LaFrance?  
13 A I can't recall, Mr. Watts.  
14 Q You can't tell the jury who it was that  
15 instructed Mr. LaFrance to download these files?  
16 A I can say that Mr. Winter was involved in asking  
17 Mr. LaFrance or arranging for Mr. LaFrance to  
18 download the computer. I don't recall if Mr.  
19 Winter in fact spoke with him directly but I do  
20 know that the downloading occurred. Mr. Winter  
21 had asked me for permission for this to occur and  
22 I gave it to him -- gave that permission to him  
23 and the downloading occurred by Mr. LaFrance.  
24 Mr. LaFrance did his work and I know  
25 that he prepared an affidavit detailing his

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1 downloading work in connection with establishing  
2 a chain of custody of all the Sheridan -- all the  
3 records that were once in the Sheridan work  
4 space.  
5 Q I appreciate that answer but I need to object to  
6 it as being nonresponsive.  
7 The specific question and then I'll  
8 get to the rest of it is, do you know who it was  
9 that told Mr. LaFrance to download the Sheridan  
10 files?  
11 A I can't recall with specificity, Mr. Watts.  
12 Q All right. Do you know when Mr. LaFrance, a  
13 Chrysler employee, downloaded the Sheridan files?  
14 A Mr. LaFrance downloaded the records from the  
15 computer that was used by Mr. Sheridan sometime  
16 in late February of '95.  
17 Q In late February of 1995, when Mr. LaFrance was  
18 downloading files off of Mr. Sheridan's computer,  
19 was anybody by way of legal counsel or other  
20 representation for Mr. Sheridan invited to  
21 observe as a prudent thing to do?  
22 A I don't recall anybody from the Legal Department  
23 being present when the downloading occurred or  
24 Mr. Sheridan or Mr. Sheridan's lawyers being  
25 present when the downloading occurred.

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1 Q Now, when Mr. Winter came to you and asked for  
2 your permission to download Sheridan's files, did  
3 you call up Mr. Morgan or anybody else in  
4 Sheridan's legal representation team to seek  
5 permission to go into his files?  
6 A We did not contact Mr. Morgan or any of his  
7 lawyers for the purpose of observing the  
8 downloading.  
9 Q So as I understand it, neither Mr. Sheridan, Mr.  
10 Pitts, Mr. Morgan, Mr. Mazur or any other  
11 Sheridan representative was even informed of the  
12 fact that a Chrysler employee was instructing  
13 another Chrysler employee to download Mr.  
14 Sheridan's files off of his computer; is that  
15 correct?  
16 A What's the question again, Mr. Watts? Please  
17 repeat that question.  
18 MR. WATTS: Ms. Moore, could you read  
19 that question back for the witness, please.  
20 COURT REPORTER: Yes.  
21 (Record read as follows:  
22 "Q So as I understand it,  
23 neither Mr. Sheridan, Mr. Pitts,  
24 Mr. Morgan, Mr. Mazur or any  
25 other Sheridan representative was

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1 even informed of the fact that a  
2 Chrysler employee was instructing  
3 another Chrysler employee to  
4 download Mr. Sheridan's files off  
5 of his computer; is that  
6 correct?")  
7 THE WITNESS: I can't recall, Mr.  
8 Watts, if we informed them or not.  
9 Q (BY MR. WATTS): Do you have any letters?  
10 A At the time we were represented by the Dickinson,  
11 Wright law firm and our attorneys are Mr.  
12 Kienbaum, Mr. Brown and Mr. Hamilton, Mr.  
13 Clippert. I can't recall if they had to prepare  
14 any letters or not, informing Mr. Morgan or Mr.  
15 Mazur of the downloading that was occurring.  
16 Q Mr. Ridella, are you familiar with the fact that  
17 the Dickinson, Wright law firm has also been  
18 involved in defending Chrysler in product  
19 liability litigation?  
20 A I'm aware of that, yes.  
21 Q And are you familiar with the fact that the  
22 Dickinson, Wright law firm had defended Chrysler  
23 previously in product liability litigation  
24 alleging that the Chrysler minivan liftgate latch  
25 was defective?

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1 A I wasn't aware of that.  
 2 Q Okay. Now, was Mr. LaFrance asked to create an  
 3 inventory of the files that he was downloading?  
 4 A I can't recall, Mr. Watts, that detail.  
 5 Q Mr. Ridella, do you recall ever having seen an  
 6 inventory that was created for the computer files  
 7 that were downloaded off of Mr. Sheridan's  
 8 computer?  
 9 A I can't recall.  
 10 Q Mr. Ridella, can you tell me whether or not prior  
 11 to the time that Mr. LaFrance began the computer  
 12 transfer procedure, whether he took an inventory  
 13 of the files that were presently on the hard  
 14 drive or on the disks of Mr. Sheridan's computer?  
 15 A I can't recall, Mr. Watts.  
 16 Q All right. So as I understand your testimony,  
 17 you are not familiar with the fact of whether an  
 18 inventory was done before the downloading and  
 19 whether an inventory was done after the  
 20 downloading; is that correct?  
 21 A I have no present recollection of it. I can't  
 22 recall.  
 23 Q Okay. Are you familiar with a gentleman by the  
 24 name of Rick Wilhelm?  
 25 A I am.

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1 Q Can you tell the jury whether Mr. Wilhelm had  
 2 ever been granted access to Mr. Sheridan's  
 3 computer files?  
 4 A I don't know, Mr. Watts. I can't recall.  
 5 Q Are you familiar with the fact that during Mr.  
 6 Sheridan's deposition in the Baird vs. Chrysler  
 7 case, that Mr. Wilhelm presented a document that  
 8 was purportedly off of the Sheridan computer  
 9 files?  
 10 A I'm not aware of what Mr. Wilhelm had done in  
 11 that trial.  
 12 Q Can you tell the members of the jury whether you  
 13 are aware of whom has had access to the Sheridan  
 14 computer files since Mr. LaFrance got done with  
 15 his procedure?  
 16 A I remember that Mr. LaFrance completed his work  
 17 and that the downloaded files that he had created  
 18 were placed in storage in the locked security  
 19 room at the Auburn Hills Technology Center and  
 20 stored there. I'm not aware of any access to  
 21 those files thereafter.  
 22 Q Well, can you tell the jury that nobody from the  
 23 Dickinson, Wright firm or no one else at Chrysler  
 24 has ever touched the Sheridan computer files  
 25 since Mr. LaFrance downloaded them?

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1 A Well, I can say that I personally was not aware  
 2 of anybody doing that. If it occurred, I was not  
 3 aware of it.  
 4 Q Well, who would be aware of whether or not that  
 5 occurred?  
 6 A Well, I guess if you're saying Mr. Wilhelm had  
 7 the files, I guess he could tell you that.  
 8 Q Well, as the witness that's been presented to  
 9 talk about the sanctity of these files, do you  
 10 have any knowledge one way or the other as to  
 11 whether somebody has touched those files?  
 12 A Mr. Watts, I can tell you this -- well, anything  
 13 is possible. I can tell you that we put in place  
 14 security measures with regard to those documents  
 15 and we did control the access and I'm relatively  
 16 certain that given those measures we put in  
 17 place, that they were very effective.  
 18 Q Well, let's follow up on that last question or  
 19 that last answer. The security measures you took  
 20 in place were after the general manager of  
 21 Minivan Operations and his subordinate, Mr.  
 22 Malecki, went into the files without your  
 23 permission and without your knowledge, correct?  
 24 A That is correct.  
 25 Q And the security measures that you put into place

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1 do not include an entrance and exit log into the  
 2 locked cabinet at the Office of General Counsel  
 3 in Highland Park, Michigan, correct?  
 4 A I do not have a log that I can recall having. I  
 5 don't recall having a log, yes.  
 6 Q And the security measures that you put in place  
 7 do not include videotaping each time somebody had  
 8 access to the Sheridan documents, correct?  
 9 A I don't recall there being videotapes, right.  
 10 Q And the security measures you put into place do  
 11 not include an inventory of the computer file  
 12 before Mr. LaFrance did the downloading, correct?  
 13 A As I said, I didn't recall seeing a log of those  
 14 computer -- of those downloaded computer files.  
 15 Q And the security measures that you put into place  
 16 do not include an inventory of the downloaded  
 17 files after Mr. LaFrance continued with his  
 18 procedure?  
 19 A I don't recall seeing an inventory.  
 20 Q And the security measures that you put into place  
 21 do not allow you to tell this jury that Mr.  
 22 Wilhelm did or did not access the computer files,  
 23 correct?  
 24 A I don't know what Mr. Wilhelm had done with those  
 25 records. I don't know -- I have no knowledge

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1 regarding those events.  
 2 MR. MILLER: Is this a good time for a  
 3 break?  
 4 MR. WATTS: I'm almost done. If you  
 5 want to take a break, of course you can call a  
 6 break whenever you want.  
 7 MR. MILLER: I need to. I will not go  
 8 into detail.  
 9 MR. WATTS: Judging by our experience  
 10 together, Mr. Miller, if you say you need to, I  
 11 think I understand what that means. Let's take a  
 12 break.  
 13 MR. MILLER: Thank you very much.  
 14 MR. WATTS: Do you want me to call you  
 15 back in about ten minutes or what?  
 16 MR. MILLER: That would be great.  
 17 MR. WATTS: Okay. Same number?  
 18 MR. MILLER: Yes.  
 19 MR. WATTS: Why don't you give that  
 20 number just to make sure I've got the right one.  
 21 MR. MILLER: It's 267-8500, I believe,  
 22 but let me make sure. I go to so many offices.  
 23 It's (810) 267-8500.  
 24 MR. WATTS: I'll call you guys back in  
 25 ten minutes.

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1 MR. MILLER: Very well. Thank you.  
 2 VIDEO TECHNICIAN: Going off the  
 3 record at 10:20 a.m.  
 4 (Off the record.)  
 5 VIDEO TECHNICIAN: We're back on the  
 6 record at 10:42 a.m.  
 7 Q (BY MR. WATTS): Mr. Ridella, do you have the  
 8 inventory that was created as a result of the  
 9 late February, early March procedure that you  
 10 described for us?  
 11 A It's not in my possession right now.  
 12 Q You do not?  
 13 A No, I don't.  
 14 Q I'm sorry, sir, I missed part of your answer. It  
 15 cut out.  
 16 A I do not, Mr. Watts.  
 17 Q Okay, thank you. Now, subsequent to the time  
 18 that this inventory was made, Chrysler received  
 19 correspondence from Mr. Sheridan's counsel, Mr.  
 20 Courtney Morgan, wherein it was alleged that the  
 21 inventory failed to list certain items and did  
 22 not contain files that had been in there before;  
 23 isn't that correct?  
 24 A That is correct.  
 25 Q In fact -- well, by way of background, can you

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1 tell me who Mr. Thomas Kienbaum is, or Kienbaum?  
 2 A Mr. Thomas Kienbaum is our lead counsel,  
 3 Chrysler's lead counsel in the case of Chrysler  
 4 vs. Sheridan.  
 5 Q All right. And Chrysler's lead counsel in the  
 6 case of Chrysler vs. Sheridan received a letter  
 7 from Mr. Sheridan's attorney, Courtney Morgan, on  
 8 July the 14th of 1995, which was copied to a Mr.  
 9 George Googasian or Googasian, G-o-o-g-a-s-i-a-n.  
 10 Can you tell the jury who George Googasian is?  
 11 A George Googasian was appointed by Judge Sosnick,  
 12 Edward Sosnick of the Oakland County Circuit  
 13 Court here in Michigan to be the special  
 14 discovery master and make recommendations to  
 15 resolve certain discovery disputes that would  
 16 arise between Chrysler and Sheridan in the  
 17 Chrysler vs. Sheridan litigation.  
 18 Q All right. And you recall shortly after Mr.  
 19 Kienbaum received this letter from Mr. Morgan,  
 20 being in discussions where these allegations that  
 21 documents had been taken out and were not  
 22 properly inventoried were made?  
 23 A I have a recollection that Mr. Morgan had so --  
 24 had written a letter to Mr. Kienbaum to that  
 25 effect, yes.

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1 Q All right. Now, Mr. Ridella, that letter is  
 2 being faxed to you so that it can be an attached  
 3 as an exhibit to the deposition, and it's a  
 4 letter from Mr. Morgan to Mr. Kienbaum dated July  
 5 14, 1995, copying Mr. Googasian. And I want to  
 6 ask you about your recollections concerning this.  
 7 In July of 1995, were you made aware  
 8 that Mr. Sheridan's lawyers specifically alleged  
 9 that Chrysler's inventory failed to list and does  
 10 not contain the liftgate latch general file?  
 11 MR. MILLER: Do you want to wait until  
 12 the letter is here so we can see that?  
 13 MR. WATTS: Well, really what I want  
 14 to find out is whether he recalls that first.  
 15 THE WITNESS: I can't recall the  
 16 specifics of that letter, Mr. Watts.  
 17 Q (BY MR. WATTS): Okay. Do you recall that the  
 18 letter specifically alleged that Chrysler's  
 19 inventory did not list the liftgate latch  
 20 competitive file?  
 21 A Mr. Watts, I'm aware that the letter made  
 22 reference that -- that the inventory did not  
 23 contain certain items, did not -- did not list  
 24 certain items but, again, I can't recall the  
 25 specific details of what they -- what Mr. Morgan

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1 claimed was not present in the inventory.  
 2 Q Okay. I'll represent to you that in addition to  
 3 claiming that the liftgate latch general and the  
 4 liftgate latch competitive files were gone, that  
 5 Safety Leadership Team meeting minutes were gone,  
 6 Safety Leadership Team preliminary file was gone,  
 7 litigate latch Safety Office file was gone, the  
 8 H.G. Cook study was gone, FMVSS 206 general was  
 9 gone, seat back strength general was gone, seat  
 10 back strength FMVSS 207 specifications was gone,  
 11 offset impact general is gone, rear crash  
 12 survivability general is gone, FMVSS 301 is gone,  
 13 side crashworthiness issues file is gone, FMVSS  
 14 214 is gone, bumper issues general is gone, S --  
 15 or NS-body bumper file is gone, tail lamp studies  
 16 by Zarowitz is gone, amber tail lamp NS-body is  
 17 gone, rear seat headrest general and Zarowitz is  
 18 gone, back-up light general is gone.  
 19 Now --  
 20 MR. MILLER: Counsel, in regard to  
 21 that, while I haven't seen the letter, you're  
 22 simply saying that those are not in the inventory  
 23 provided by Chrysler as opposed to they are not  
 24 among the documents. Am I correct in that?  
 25 MR. WATTS: Well, what I'm saying is

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1 that these matters are contained in a letter by  
 2 Mr. Morgan.  
 3 MR. MILLER: Well, let's be fair,  
 4 Mikal. That letter says that those documents are  
 5 not gone; it just notes that they are not listed  
 6 in the inventory. That's a big difference. I  
 7 think you ought to be fair in your  
 8 characterization.  
 9 MR. WATTS: Well, if you let me finish  
 10 my question, we can go ahead and clarify things  
 11 and get to it.  
 12 MR. MILLER: Well, you had already  
 13 characterized in that long litany gone, gone,  
 14 gone and that's not what that says.  
 15 MR. WATTS: Ms. Moore, unless we're  
 16 going to swear in Mr. Miller, I'm going to  
 17 proceed with my next question to the witness.  
 18 MR. MILLER: You should do that.  
 19 Q (BY MR. WATTS): Mr. Witness, as opposed to Mr.  
 20 Counsel, did the inventory contain a reference to  
 21 the liftgate latch general file?  
 22 A I can't recall -- Mr. Watts, I don't have the  
 23 inventory in front of me. I don't know what it  
 24 contains at this time.  
 25 Q Do you know whether the inventory contained

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1 references to anything dealing with liftgate  
 2 latches?  
 3 A Well, let me -- if could clarify for you, the  
 4 inventory was meant to be a description of what  
 5 generally was found in the files of Mr. Sheridan,  
 6 and to that extent, it's simply a recording of  
 7 what the -- what the inventory people had found.  
 8 Again, it was not meant to go into each and every  
 9 document in the Sheridan records, but to be a  
 10 broad brush general description of what they had  
 11 located.  
 12 MR. WATTS: Objection, nonresponsive.  
 13 Q (BY MR. WATTS): Do you know whether the  
 14 inventory listed anything dealing with liftgate  
 15 latches?  
 16 A I can't recall, Mr. Watts.  
 17 Q Do you recall a minute ago Mr. Miller  
 18 interrupting the deposition with a speech about  
 19 how none of those documents are gone; they are  
 20 simply not listed in the inventory? Do you  
 21 recall that?  
 22 A Yes, I do.  
 23 Q And can you tell the members of the jury whether  
 24 all the documents that I referenced concerning  
 25 liftgate latches are in fact still in the

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1 Sheridan documents?  
 2 A Well, Mr. Watts, I personally cannot answer that  
 3 question.  
 4 Q Okay. Well, the reason I'm curious is that Mr.  
 5 Miller spent money for Ms. Moore to transcribe  
 6 his long soliloquy about gone versus not in the  
 7 inventory and yet yesterday he assured me that  
 8 there were no liftgate latch documents in the  
 9 Sheridan files. Do you know whether there are  
 10 any liftgate latch documents in the Sheridan  
 11 files?  
 12 A I have not personally been through Mr. Sheridan's  
 13 files.  
 14 Q So with regard to this issue as to whether  
 15 documents are gone -- with regard to this issue  
 16 as to whether the documents are gone or whether  
 17 they were simply failed to be listed in the  
 18 inventory, you can't help us about that one way  
 19 or the other concerning liftgate latch files; is  
 20 that right?  
 21 A All I can say is I'm aware of -- that the  
 22 inventory was prepared and that I cannot -- I  
 23 cannot tell you, because I've not been through  
 24 the documents myself, what is in there and what  
 25 is not in there specifically.

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1 Q Okay. Mr. Ridella, when did you first learn that  
2 you were going to be identified as a witness in  
3 the Matthews vs. Chrysler trial that's going to  
4 take place next week beginning November 18th,  
5 1996?  
6 A Rough guess, about two weeks ago.  
7 Q And who informed you of that fact?  
8 A It was either Rita Burns or one of her  
9 paralegals.  
10 Q Did you have a discussion with Miss Rita Burns or  
11 one of her paralegals in preparation for your  
12 deposition?  
13 A Yes, I did.  
14 Q Did you meet with Mr. Miller in preparation for  
15 this deposition?  
16 A Yes, I did.  
17 Q How long did you meet with them in preparation  
18 for the deposition?  
19 A I would say about three or four hours.  
20 Q What was discussed?  
21 MR. MILLER: Objection, instruct the  
22 witness not to answer on the basis of the  
23 attorney-client privilege.  
24 Q (BY MR. WATTS): Are you going to answer the  
25 question, Mr. Ridella, or are you going to follow

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1 the qualifier that when the letter gets there --  
2 and Ms. Moore, it is a letter as I've described  
3 on the record, dated July 14, 1995, from Courtney  
4 Morgan to Thomas Kienbaum, copy with George  
5 Googasian -- I would like that marked as Exhibit  
6 No. 2 to Mr. Ridella's deposition.  
7 COURT REPORTER: Okay.  
8 MR. WATTS: And with that  
9 clarification, I believe I am finished. I pass  
10 the witness.  
11 MR. MILLER: I do have some questions.  
12 EXAMINATION  
13 BY MR. MILLER:  
14 Q Mr. Ridella, would you explain for the jury your  
15 education beyond the high school level.  
16 A Yes. I have a bachelor of arts degree from the  
17 University of Michigan, and a law degree from  
18 Wayne State University Law School in Detroit.  
19 Q And when did you receive your law degree?  
20 A In 1978.  
21 Q And in regard to your legal employment, would you  
22 describe for the jury your employment since  
23 graduation from law school.  
24 A Yes, I worked for a law firm in Detroit, the  
25 Professional Legal Centers firm, and from 1978

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1 the advice of your counsel?  
2 A I'm going to follow the advice of my counsel.  
3 MR. WATTS: Certify the question, Ms.  
4 Moore.  
5 Q (BY MR. WATTS): Mr. Ridella, what is your salary  
6 at Chrysler Corporation?  
7 MR. MILLER: Objection. How is that  
8 relevant, counsel?  
9 MR. WATTS: Goes to his credibility.  
10 THE WITNESS: My base salary is  
11 approximately \$130,000 a year.  
12 Q (BY MR. WATTS): And in addition to your base  
13 salary, what was your total compensation package  
14 in 1995, last year?  
15 A You mean the value of it, sir?  
16 Q Yes, sir.  
17 A I received a bonus last year of \$81,000, and I  
18 receive an employee benefits package of health  
19 care, group insurance, pension, and a company  
20 car.  
21 Q All right, sir. Mr. Ridella, when you were  
22 informed that you were going to be a witness in  
23 the Matthews vs. Chrysler case which begins trial  
24 on November 18th of 1996, were you informed that  
25 it was a case that was filed down in Texas?

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1 until 1979. After that I worked approximately  
2 one year for a law firm in Southfield, Michigan,  
3 by the name of Canard, Kevlin and Van Houten  
4 (phonetic), and then after that, I began my  
5 employment at Chrysler. That was in 1980.  
6 MR. WATTS: Which year? I'm sorry, I  
7 didn't hear that.  
8 THE WITNESS: 1980.  
9 MR. WATTS: Thank you, sir.  
10 Q (BY MR. MILLER): And would you describe for the  
11 record the general areas that you've been  
12 responsible for within Chrysler since 1980.  
13 A All of my career at Chrysler I've been involved  
14 in issues concerning employment law, employee  
15 benefits law and matters concerning personnel and  
16 labor law in general. I also manage outside  
17 counsel in litigation that occurs both within  
18 Michigan and outstate.  
19 Q Now, Mr. Ridella, you've already testified in  
20 response to Mr. Watts' examination that you did  
21 become aware of certain employment issues  
22 relating to Mr. Paul Sheridan in the fall of  
23 1994; is that correct?  
24 A That is correct.  
25 Q And without disclosing in any of your subsequent

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1 A Yes, I was.  
2 Q And have you ever been to Texas, sir?  
3 A Yes, I have.  
4 Q Okay. Have you been informed that you may be  
5 called as a witness at the time of the trial of  
6 this case?  
7 A Yes, I was.  
8 Q And I want to represent to you that all  
9 indications are that this trial will last between  
10 two and a half, three, three and a half weeks  
11 which would put us from November the 18th  
12 sometime into the middle of December. Do you  
13 have anything that would prevent you from  
14 testifying live at the time of trial in  
15 Palestine, Texas, when this case is tried?  
16 A I have no conflicts.  
17 Q All right. And so we can expect to see you  
18 there.  
19 MR. MILLER: Obviously, counsel, that  
20 will be a decision made by Chrysler's counsel.  
21 MR. WATTS: Mr. Ridella, I appreciate  
22 you doing this deposition by phone and I very  
23 much look forward to meeting you in Palestine in  
24 the next three or four weeks, sir.  
25 I think that's all my questions with

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1 answers any attorney-client privilege information  
2 or work product information, or information which  
3 is being protected by any court order in any  
4 litigation involving Mr. Sheridan, would you  
5 identify the issues associated with Mr.  
6 Sheridan's employment status in December of 1994?  
7 MR. WATTS: Excuse me, I need to make  
8 an objection. The objection is -- is that I  
9 object to this witness being asked to expose  
10 whatever parts of the issue he wishes to expose  
11 and then put the raincoat over the embarrassing  
12 parts that may be covered by attorney-client  
13 privilege. This is a use of the privilege as a  
14 sword as opposed to a shield which is not  
15 permitted under Texas law. We hereby would  
16 request the witness to disclose in answer to this  
17 question all information that he has, including  
18 attorney-client information; otherwise, we will  
19 be forced to take the matter before the court.  
20 Thank you.  
21 Q (BY MR. MILLER): Again, Mr. Ridella, without  
22 disclosing any attorney-client or work product or  
23 other confidential information protected by court  
24 order in the Sheridan litigation, would you  
25 relate the issues that related to Mr. Sheridan's

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1 employment that are in fact disclosed in the  
 2 pleadings associated with any litigation between  
 3 Chrysler and Mr. Sheridan.  
 4 A Yes. Paul Sheridan was identified by our  
 5 security department as an individual who had  
 6 disclosed confidential information during the  
 7 course of his employment. That information was  
 8 brought to the attention of the personnel  
 9 department in December of 1994, and the personnel  
 10 department, Mr. Smuts in particular, had asked of  
 11 me to attend a meeting to discuss the fact  
 12 finding and detail, and provide my legal  
 13 evaluation, and following that meeting in  
 14 December of 1994, Mr. Sheridan was discharged  
 15 from employment.  
 16 MR. WATTS: I'm going to object to the  
 17 last response as containing matters that could  
 18 only be known to this witness by hearsay. Mr.  
 19 Miller, for purposes of shortening the  
 20 transcript, may I have -- I mean, do we have the  
 21 understanding that objections to hearsay are  
 22 reserved pursuant to the rules?  
 23 MR. MILLER: Yes.  
 24 MR. WATTS: Okay, fair enough. Go  
 25 ahead, sir.

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1 Q (BY MR. MILLER): And specifically, Mr. Ridella,  
 2 what information was made available from Mr.  
 3 Sheridan to Chrysler associated with either his  
 4 suspension or termination in regard to disclosure  
 5 of any confidential or trade secret information?  
 6 A Mr. Sheridan had admitted to our security  
 7 investigators that he was the source of the leak  
 8 of confidential information.  
 9 Q Now, Mr. Watts has asked you a number of  
 10 questions regarding the possession of the files  
 11 maintained by Mr. Sheridan, but I want the record  
 12 to be clear in regard to those facts. Were all  
 13 of the files, both hard copy paper documents and  
 14 the computer utilized by Mr. Sheridan placed in  
 15 the security room that you described?  
 16 A Yes. I'm informed that, yes, all those -- all  
 17 that information was placed in the locked  
 18 security room at the Auburn Hills Technology  
 19 Center.  
 20 Q And was all of that information as we've  
 21 described it placed in this security room on or  
 22 about December 19, 1994?  
 23 A That is correct.  
 24 Q And would you describe again the location of this  
 25 room, whether or not it was locked and who had

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1 access to it.  
 2 A The room is located in the rear end of the  
 3 security department at the Auburn Hills  
 4 Technology Center. It is a storage room. It is  
 5 a locked facility. And the documents were placed  
 6 in there and keys were maintained by the security  
 7 manager, Brian Bradley, and access to the room  
 8 with the key could only be used by Bradley and  
 9 his supervisors.  
 10 Q Now, subsequent to placing the documents in this  
 11 secured area, was Mr. Sheridan terminated?  
 12 A Yes.  
 13 Q And either at the time of Mr. Sheridan's  
 14 suspension or at the time of his termination,  
 15 were you aware of any information regarding the  
 16 minivan liftgate latch that played any role in  
 17 his suspension or termination?  
 18 A I was aware of none.  
 19 Q Now, subsequently to Mr. Sheridan's termination,  
 20 did litigation develop between Chrysler and Mr.  
 21 Sheridan?  
 22 A Chrysler filed a lawsuit against Mr. Sheridan in  
 23 the Oakland County Circuit Court on December the  
 24 27th, 1994. That action was filed by Chrysler,  
 25 again, in the Oakland County Circuit Court and

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1 continues to pend as of the present moment.  
 2 Q And, again, based on the pleadings in that  
 3 litigation, what is the primary purpose or relief  
 4 being sought by Chrysler?  
 5 A Chrysler seeks injunctive relief against Mr.  
 6 Sheridan and damages against him as well for his  
 7 disclosures.  
 8 Q Mr. Ridella, would you state for the jury when it  
 9 was the first time that you became aware that Mr.  
 10 Sheridan was making any statements or claims  
 11 regarding the minivan liftgate latch.  
 12 A The first time that I'm aware of the claims about  
 13 the minivan latch were in connection with a  
 14 pleading filed by his lawyer, Courtney Morgan, in  
 15 early February of 1995. Reference was made in  
 16 his answer to the minivan liftgate latch.  
 17 Q Now, during Mr. Watts' examination of you, he  
 18 inquired about the visit made by Mr. Dennis  
 19 Malecki and Richard Winter to this secured area.  
 20 Do you recall that generally?  
 21 A Yes, I do.  
 22 MR. MILLER: I'm going to ask the  
 23 court reporter to mark as Exhibits 3 and 4 the  
 24 affidavit of Dennis Malecki, filed in the Circuit  
 25 Court for the County of Oakland, in the matter

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1 captioned Chrysler Corporation vs. Paul Sheridan,  
 2 and the next exhibit is that of the affidavit of  
 3 Richard Winter, filed in that same proceeding.  
 4 (Deposition Exhibit Nos. 3 and 4  
 5 marked for identification.)  
 6 MR. WATTS: Just so it's clear, we  
 7 object to the entry of both of those documents on  
 8 the ground of hearsay.  
 9 Q (BY MR. MILLER): Mr. Ridella, turning your  
 10 attention to paragraph four, first, of Exhibit 4  
 11 (sic), that is, the affidavit of Mr. Malecki, and  
 12 would you read for the jury all of the content of  
 13 paragraph four of Mr. Malecki.  
 14 A Yes, paragraph four, "In the boxes I came across  
 15 a large number of the 'sender's copy' of Federal  
 16 Express air bills prestamped with Chrysler's  
 17 account number. I removed the Federal Express  
 18 air bills from the boxes and thereafter gave them  
 19 to Mr. Fonger. Although I reorganized the  
 20 contents of some boxes into other boxes, except  
 21 for the Federal Express air bills, which I gave  
 22 to Mr. Fonger, I removed nothing from the UPS  
 23 room or the boxes."  
 24 Q And directing your attention to Exhibit No. 4,  
 25 the affidavit of Mr. Winter, and again, at

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1 paragraph four, would you read for the jury the  
 2 sworn statement of Mr. Winter.  
 3 A Paragraph four, "In the boxes I came across a  
 4 large number of the 'sender's copy' of Federal  
 5 Express air bills prestamped with Chrysler's  
 6 account number. I removed the Federal Express  
 7 air bills from the boxes and thereafter gave them  
 8 to Mr. Fonger. I removed nothing else from the  
 9 UPS room or the boxes. I have had no contact  
 10 with the boxes in the UPC room since January 3,  
 11 1995."  
 12 Q Mr. Ridella, what was the interest in the Federal  
 13 Express air bills described in both of these  
 14 gentlemen's sworn statements?  
 15 A The purpose of those air bills was -- they were  
 16 given to Mr. Fonger for review as part of his  
 17 continuing investigation of what other  
 18 information Mr. Sheridan may have disclosed to  
 19 other parties, other information being other  
 20 Chrysler confidential information.  
 21 Q And subsequently have you been advised that those  
 22 Federal Express air bills have been returned to  
 23 the file collection maintained by Mr. Sheridan?  
 24 A Yes.  
 25 Q Mr. Ridella, from the time of Mr. Sheridan's

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1 termination up until February or March of 1995,  
2 where were the files maintained by Mr. Sheridan  
3 secured?  
4 A They were secured in the locked storage room at  
5 the Chrysler security department in Auburn Hills,  
6 Michigan.  
7 Q And during that entire time, state whether or not  
8 those documents were available only at your  
9 direction or to supervisory personnel.  
10 A Beginning with -- beginning in early January of  
11 1996 -- 1995, those documents or access to those  
12 documents could not and were not accessible  
13 except through me.  
14 Q Now, as a part of the litigation between Chrysler  
15 and Mr. Sheridan, you've already described that  
16 an inventory was conducted. I just want the jury  
17 to understand. State whether or not that  
18 inventory was conducted at the direction of the  
19 court.  
20 A Yes, it was.  
21 Q And what role did you play with respect to  
22 performing the inventory directed by the court?  
23 A There was a hearing before Judge Sosnick on March  
24 1st, 1995 at which time the court indicated that  
25 it wanted to have an inventory conducted of the

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1 documents. We began that inventory. I was  
2 responsible for coordinating it with Mr. Charles  
3 Clippert of the Dickinson, Wright law firm. We  
4 chose the individuals who would actually be doing  
5 the inventory. As I mentioned, those individuals  
6 were Catherine Moran, Charles Murphy and Sharon  
7 Vasher.  
8 They completed the inventory and Mr.  
9 Clippert and I assisted in the compilation of the  
10 inventory to get it ready for filing with the  
11 court.  
12 Q And was it filed with the court?  
13 A I recall that it was provided to Mr. Morgan,  
14 attorney for Mr. Sheridan, and I believe to the  
15 discovery master, Mr. Googasian. I don't recall  
16 at this time if we actually filed it with the  
17 court. It might have been.  
18 Q Now, did it also come to pass that the court  
19 directed that the files maintained by Mr.  
20 Sheridan be moved from the Chrysler Technology  
21 Center to another location?  
22 A Yes. Following the court's March 1st hearing, an  
23 order was entered on March the 15th and one of  
24 the requirements of that order was that the files  
25 be moved to a location in Highland Park,

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1 Michigan. The move was actually accomplished in  
2 compliance with the court order at the end of  
3 March, 1995.  
4 Q And the new location was at the Highland Park  
5 offices that you've described previously of the  
6 Office of General Counsel for Chrysler  
7 Corporation?  
8 A That is right. I secured a -- an empty room in  
9 our offices at the Office of General Counsel, and  
10 the documents were placed there.  
11 Q And could you summarize for the jury what steps  
12 were taken with respect to the transfer of the  
13 files maintained by Mr. Sheridan from Chrysler  
14 Technology Center to the Office of General  
15 Counsel in Highland Park.  
16 A Yes. I had organized the move to occur by two  
17 movers, two individuals. The movers arrived at  
18 the CTC security offices and were greeted there  
19 by Mr. Aubrey Stamps, a security guard working at  
20 the -- working in the security office at the  
21 Auburn Hills Technology Center.  
22 Mr. Stamps was directed by me to  
23 observe the loading of the boxes from the  
24 security storage room into a truck and to  
25 accompany the movers to my offices in Highland

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1 Park, Michigan, for the move.  
2 The individuals arrived at my offices  
3 with the boxes and I observed them moving the  
4 boxes from the truck to the room at our  
5 facilities where they were stored.  
6 Q And am I correct in understanding that once they  
7 were stored at Highland Park, they were under  
8 lock and key under your control?  
9 A Yes. At the time that the boxes were being moved  
10 from the truck to the room, I contacted a  
11 security official at the Highland Park security  
12 office to come over and put a new lock on the  
13 door of the room in which the boxes were being  
14 stored, and that individual finished his work  
15 about the same time that the boxes had been  
16 unloaded. He then supplied me a key, the only  
17 key to the room, and I locked the door behind  
18 him.  
19 Q Now, at any point in time associated with the  
20 taking of the inventory of the documents or the  
21 continued care and custody by Chrysler of those  
22 documents, or their removal to the Office of  
23 General Counsel, did the court ever order that  
24 any log be kept as to who was looking at these  
25 documents?

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1 A No.  
2 Q Did the court ever order that any videotaping be  
3 done as to who was reviewing or had access to  
4 these documents?  
5 A No.  
6 Q Did the court subsequently permit Mr. Sheridan  
7 and his attorneys to actually physically review  
8 the documents which had been maintained by Mr.  
9 Sheridan as a Chrysler employee?  
10 A Yes.  
11 Q And when did that take place?  
12 A Mr. Sheridan and his lawyers reviewed the  
13 documents to the best of my recollection on three  
14 occasions in April of 1995.  
15 Q And I think you've already testified that there  
16 were representatives in terms of lawyers and a  
17 security person for Chrysler who were present  
18 during Mr. Sheridan's and his attorneys' review  
19 of those files?  
20 A Yes. One or all of the individuals I mentioned  
21 were present at the time.  
22 Q Now, subsequent to Mr. Sheridan and his attorneys  
23 reviewing the files that had been maintained by  
24 Mr. Sheridan as a Chrysler employee, did any of  
25 Mr. Sheridan's counsel ever provide a description

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1 of what they had actually done as a part of that  
2 review of the Sheridan files in April of 1995?  
3 A You mean provide us a listing of what they had in  
4 fact looked at?  
5 Q First, did they provide any kind of listing, yes.  
6 A Not that I know of, no.  
7 Q And secondly, did any of Mr. Sheridan's attorneys  
8 ever make any representations to the court or the  
9 special discovery hearing master with respect to  
10 what had been done by Mr. Sheridan and his  
11 attorneys in reviewing the files maintained by  
12 Mr. Sheridan?  
13 A Yes, they did.  
14 Q And approximately when did that happen?  
15 A Approximately July of 1995. That's when that  
16 occurred.  
17 Q And did you receive -- were you there at that  
18 time?  
19 A I was not present.  
20 Q And did you receive any information from  
21 Chrysler's counsel involved in the Sheridan  
22 litigation as to what description had been  
23 provided by Mr. Sheridan's counsel regarding what  
24 Mr. Sheridan and his counsel had reviewed in the  
25 Sheridan files in April?

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1 A Yes.  
 2 MR. MILLER: I'd ask the court  
 3 reporter to mark as next in line the partial  
 4 transcript of the deposition of Paul Sheridan in  
 5 the Chrysler Corporation vs. Paul Sheridan  
 6 matter, dated July 26, 1995, and as the next in  
 7 line an enlarged, in terms of type, portion of  
 8 that transcript, pages 25 through 28.  
 9 (Deposition Exhibit Nos. 5 and 6  
 10 marked for identification.)  
 11 Q (BY MR. MILLER): Showing you now, Mr. Ridella,  
 12 what's been marked as Exhibit No. 6 to your  
 13 deposition, and direct your attention to, first,  
 14 page 25, line 8 and line 9, would you read for  
 15 the jury those two sentences as made by Mr.  
 16 Sheridan's counsel, Mr. Morgan.  
 17 A Yes, beginning at line 8, "We have been through  
 18 more than three boxes, Mr. Kienbaum. It's been  
 19 11 boxes."  
 20 Q Now, Mr. Ridella, to your knowledge,  
 21 approximately how many boxes of documents  
 22 constitute the files maintained by Mr. Paul  
 23 Sheridan as a Chrysler employee?  
 24 A There are approximately 25 boxes.  
 25 Q Now, you've already identified that Mr. Googasian

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1 was the special discovery master, is he not, in  
 2 the Chrysler vs. Sheridan litigation?  
 3 A Yes, he was at the time.  
 4 Q And we'll get to that in a moment in terms of Mr.  
 5 Googasian. Again, at page 25, at lines --  
 6 starting at line 24, would you read through page  
 7 26 of the transcript through line 10, please, for  
 8 the jury. And again, is this Mr. Morgan  
 9 speaking?  
 10 A It is. "Now, as long as you have indicated, Mr.  
 11 Googasian, that we should redouble our efforts to  
 12 get through the rest of those 25 boxes to get to  
 13 the bottom of the issue of whether or not items  
 14 have been added or removed, as our letter  
 15 indicates, our access to those documents, those  
 16 boxes was focused upon identifying those items  
 17 which belonged to Mr. Sheridan that may have been  
 18 in there, and I think Mr. Hamilton, who has been  
 19 present for some of those discussions when we  
 20 have been going over the boxes, will attest to  
 21 that. That is what we have been doing."  
 22 Q Now, Mr. Ridella, Mr. Morgan continues on page 26  
 23 and I'd like you to read his statements from line  
 24 11 through line 20 on page 26.  
 25 A "We have pointed out, yes, that that's yours and

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1 this is ours. Some things that have been in  
 2 dispute we said, look, you keep it, and the boxes  
 3 have had pieces of papers in them and stuff put  
 4 back in the box, here's the Chrysler side and  
 5 here's the Sheridan side. That has been done,  
 6 the point being that's been the focus of the  
 7 inquiry. The focus of the inquiry has been what  
 8 belongs as to Sheridan, what belongs to Chrysler,  
 9 not what has been added and what has been  
 10 subtracted."  
 11 Q Now, over the page, Mr. Ridella, on page 27, the  
 12 special discovery master, Mr. Googasian, is  
 13 commenting upon the statements made by Mr.  
 14 Morgan, and would you read for the jury on page  
 15 27, lines 17 through 23, please.  
 16 A "As Mr. Morgan indicates, he has not gone through  
 17 all 25 boxes. He can say and is not saying he  
 18 has gone through all 25 boxes. So there is no  
 19 accusation quote-unquote on the table. I think  
 20 Mr. Kienbaum's response is if you haven't gone  
 21 through the documents, don't accuse us of having  
 22 added or subtracted. I'm saying it's not as an  
 23 accusation; it's a statement."  
 24 Q Thank you. Mr. Ridella, subsequent to the date  
 25 of the proceeding on July 26, 1995 that you've

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1 just read portions of, have Mr. Sheridan or his  
 2 attorneys or any other representative reviewed  
 3 the approximately 25 boxes of files maintained by  
 4 Mr. Sheridan?  
 5 A No, they have not.  
 6 Q Now, at some point in time have the documents  
 7 maintained by Mr. Sheridan been moved from the  
 8 Office of General Counsel?  
 9 A Yes, they have.  
 10 Q And where have they been moved to?  
 11 A They were moved in April of this year to the  
 12 Dickinson, Wright law offices in Troy, Michigan.  
 13 Q And have they been maintained by the Dickinson,  
 14 Wright firm since the time of their transfer  
 15 until this date?  
 16 A That is correct. They were moved because  
 17 Chrysler moved its world headquarters from  
 18 Highland Park, Michigan, to Auburn Hills,  
 19 Michigan. That included our Legal Staff offices,  
 20 so we had to make provision for the moving of  
 21 those records to a location and they were so  
 22 moved to the Troy offices of the Dickinson,  
 23 Wright, firm.  
 24 Q And what steps were taken to maintain the  
 25 security integrity of the files when they were

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1 moved from the Office of General Counsel to the  
 2 offices of Dickinson, Wright?  
 3 A I obtained the service of a representative from  
 4 the Dickinson, Wright offices in Detroit, and got  
 5 one of my own support staff people to move the  
 6 documents into a -- either two cars or one  
 7 vehicle, and to move those documents -- transport  
 8 those documents directly to a storage room that  
 9 had been set aside for the documents at the  
 10 Dickinson, Wright Troy offices. I had arranged  
 11 for that move.  
 12 Q And have those files been maintained in a locked  
 13 area at the Dickinson, Wright firm since that  
 14 time?  
 15 A Yes.  
 16 Q Mr. Ridella, have any of the documents among the  
 17 files maintained by Mr. Sheridan, to any  
 18 knowledge that you have, been destroyed since  
 19 Chrysler took possession of them on December 19,  
 20 1994?  
 21 A Categorically, no.  
 22 Q And have you ever directed that any documents in  
 23 the files maintained by Mr. Sheridan be removed  
 24 and not replaced?  
 25 A I have not.

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1 Q Are you aware of any other person who has ever  
 2 directed that any document be removed and not  
 3 replaced among the files that were maintained by  
 4 Mr. Sheridan?  
 5 A I'm aware of none.  
 6 Q Mr. Ridella, do you have any information of any  
 7 kind that any documents in the files maintained  
 8 by Mr. Sheridan have been removed and not  
 9 replaced?  
 10 A I have none.  
 11 Q Mr. Ridella, do you have any reason to believe  
 12 that any documents among the files maintained by  
 13 Mr. Sheridan have been removed and not replaced?  
 14 A I have none.  
 15 MR. MILLER: I have nothing further.  
 16 EXAMINATION  
 17 BY MR. WATTS:  
 18 Q Mr. Ridella, do you have any reason to believe  
 19 that Chrysler has destroyed crash tests  
 20 concerning the Chrysler minivan during litigation  
 21 pending against the minivan?  
 22 MR. MILLER: Objection, beyond the  
 23 scope of examination, also lacks foundation,  
 24 counsel, in regard to this witness's knowledge  
 25 about crash tests.

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1 Q (BY MR. WATTS): Go ahead, sir.  
 2 A I have no such knowledge, Mr. Watts.  
 3 Q Do you have any reason to believe that parts of  
 4 the Safety Office file relating to the NHTSA  
 5 defect investigation on the Chrysler minivan  
 6 liftgate latch have been destroyed?  
 7 MR. MILLER: Same objections.  
 8 Q (BY MR. WATTS): Go ahead, sir.  
 9 A I have no reason to believe, because I'm not even  
 10 -- I'm not part of that process.  
 11 Q Do you have any reason to believe that meeting  
 12 minutes among the engineers that design the  
 13 Chrysler minivan liftgate latch have been  
 14 destroyed?  
 15 MR. MILLER: Same objections.  
 16 THE WITNESS: I have no reason to  
 17 believe that.  
 18 Q (BY MR. WATTS): Do you know where they are?  
 19 A No, I don't.  
 20 Q Okay. If you find them, you let me know, okay?  
 21 MR. MILLER: Same objections.  
 22 Q (BY MR. WATTS): Mr. Ridella, do you receive the  
 23 Wall Street Journal?  
 24 A No, I do not.  
 25 Q Okay. Well, keep an eye out for it in December,

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1 STATE OF MICHIGAN )  
 2 COUNTY OF MACOMB )ss  
 3 I, Melinda S. Moore, (CSR-2258), a Notary Public  
 4 commissioned and qualified in and for the State of  
 5 Michigan, do hereby certify there came before me on  
 6 the date and at the location hereinbefore mentioned,  
 7 the following named person, to wit: GREGORY J.  
 8 RIDELLA, who was by me sworn to testify truthfully  
 9 concerning the matters in controversy in this cause;  
 10 that he was carefully examined upon his oath and his  
 11 examination was reduced to typewritten form under my  
 12 supervision; that the deposition is a true record of  
 13 the testimony given by the witness.  
 14 I further certify that I am neither attorney or  
 15 counsel for, nor related to or employed by any of the  
 16 parties to the action in which this deposition is  
 17 taken; further, that I am not a relative or employee  
 18 of any attorney or counsel employed by the parties  
 19 hereto or financially interested in the action.  
 20 IN WITNESS WHEREOF, I have hereunto set my hand  
 21 and affixed my Notarial Seal this 12th day of  
 22 November, 1996.  
 23 \_\_\_\_\_  
 24 Melinda S. Moore, Notary Public  
 25 Macomb County, Michigan  
 My Commission Expires: 9-6-2000

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1 okay?  
 2 MR. WATTS: That's all my questions.  
 3 MR. MILLER: Thank you. I have  
 4 nothing further. The witness will read and sign  
 5 his deposition transcript.  
 6 VIDEO TECHNICIAN: This deposition is  
 7 concluded at 11:23 a.m.  
 8 (Deposition concluded at or about  
 9 11:23 a.m.)  
 10 (Deposition Exhibit No. 2 marked  
 11 for identification.  
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1 FURTHER DEPONENT SAYETH NOT:  
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 12 Gregory J. Ridella \_\_\_\_\_  
 13  
 14 Subscribed and sworn to before me  
 15 this \_\_\_\_\_ day of \_\_\_\_\_, 19\_\_\_\_  
 16 Notary Public, \_\_\_\_\_ County \_\_\_\_\_  
 17 My Commission expires: \_\_\_\_\_, 19\_\_\_\_.  
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