

STATE OF MICHIGAN

IN THE CIRCUIT COURT FOR THE COUNTY OF OAKLAND

CHRYSLER CORPORATION,
a Delaware corporation,

Plaintiff,

vs.

PAUL SHERIDAN,

Defendant.

C.A.#94-48917-CZ
HON. EDWARD SOSNICK

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AFFIDAVIT OF SEYMOUR KLIGER

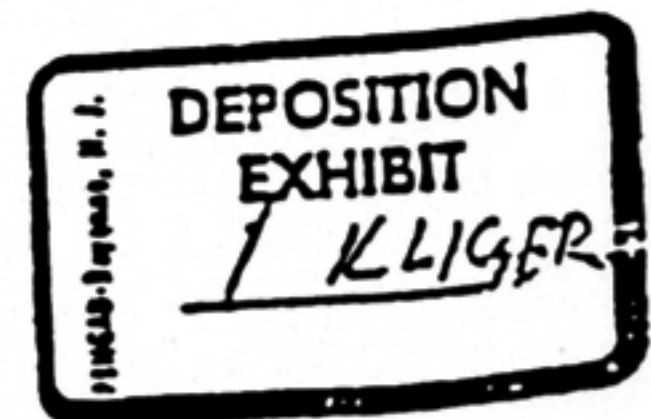
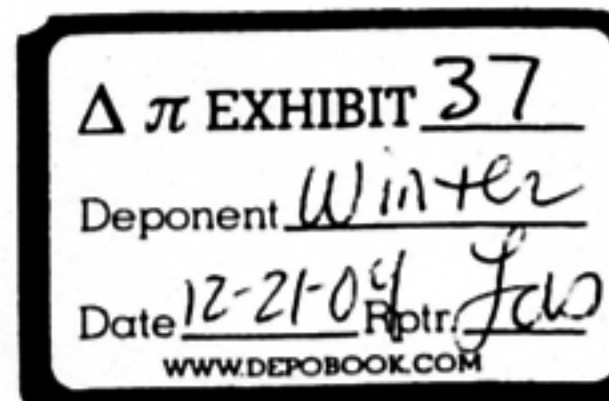
STATE OF MICHIGAN)

COUNTY OF Washtenaw) ss.

I, SEYMOUR KLIGER, being first duly sworn, depose and say:

1. My name is Seymour Kliger. I am a resident of the State of Michigan. I am over the age of 21.

2. I am the General Manager of Garrity Motor Sales, Inc., located at 11500 Joseph Campau, Hamtramck, MI 48212. I have been associated with the automobile business since 1952 and have been the General Manager of Garrity Motors Sales, Inc. (hereinafter known as "Garrity Motors") since it opened in 1959.



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3. Garrity Motors is the closest Dodge Dealership to Chrysler Motor Headquarters located in Highland Park, MI. Additionally, there are many plants of the Chrysler Corporation in the near vicinity to Garrity Motors.

4. Through my employment with Garrity Motors, I have become acquainted with many Chrysler Corporation executive employees and officers of the Corporation.

5. My associations with such persons have been both personal and professional.

6. By way of example, the following is a partial list of present and/or former Chrysler Corporation employees with whom I have communicated either orally or in writing on a wide range of subject matters in the past: Lee A. Iacocca, Gerald Greenwald, Robert Lutz, Hal Sperlich, R. S. Miller, Jack Withrow, John Naughton, Gar Laux, Gino Giccondi, Jerry York, Martin Levine and Richard Dauch.

7. As indicated, I have had discussions with these and other employees regarding a wide range of subject matters related to Chrysler's business, including information of a potentially confidential and/or sensitive nature to the Corporation. I have also exchanged documents with at least some of these persons in connection with said discussions. A partial list of the subject matters over which I have had discussion or exchanged documents includes the following: sales, marketing, product planning, complexity, warranty, product liability, manufacturing, communications, customer relations and personnel.

8. I have done these things with one reward in mind -- that the Chrysler Corporation receive the sales, profit, and market share that is rightfully theirs. This principle has and will guide me in all my endeavors related to Chrysler Corporation.

9. I am acquainted with Paul Sheridan. I first met him through sales contacts at Garrity Motors and have known him for several years. I have sold vehicles to him and many of his acquaintances based upon Mr. Sheridan's recommendations. I have also interacted with Mr. Sheridan regarding certain matters related to Chrysler Corporation's business in much the same manner as I have interacted with other Chrysler employees as set forth in paragraph 6 of this Affidavit.

10. I am also acquainted with Joseph Eohn, a writer for the Automotive News. I have always considered his journalistic integrity towards the Chrysler Corporation to be of the highest order.

11. On February 7, 1995, I was served with a subpoena for my deposition to be taken in the case of Chrysler Corporation v Paul Sheridan. Attached to said subpoena, was a copy of Chrysler's Verified Complaint and certain attachments including Affidavits of Martin Levine, John M. Fonger, Michael J. Krotche, Dennis C. Malecki and Mark W. Crossman.

12. I understand that Chrysler Corporation has identified me as a third party ("John Doe"), to whom Paul Sheridan allegedly gave crash test information referred to in paragraphs 7, 8, 9 and 10 of Chrysler's Verified Complaint. I also understand that Chrysler Corporation alleges that I am the third party referred to in paragraph 10 of its Verified Complaint, who gave crash test documents to Joseph

Bohn at the Automotive News.

13. These allegations are untrue. I neither received from Paul Sheridan any crash tests results, nor transmitted or gave to Joseph Bohn any copies of any crash tests results documents.

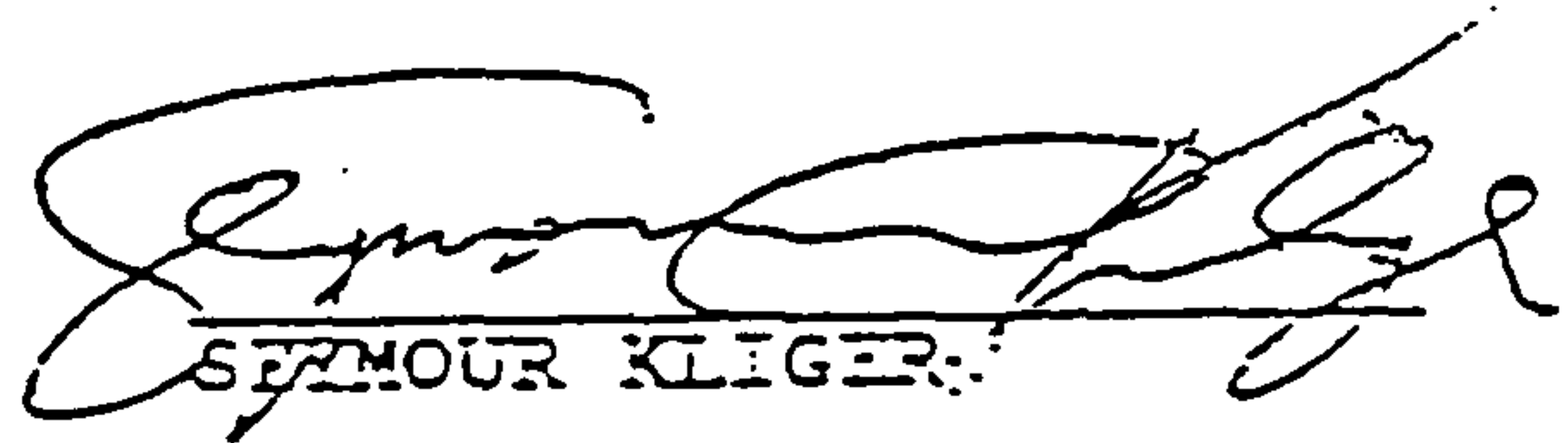
14. Chrysler's Verified Complaint is dated December 27, 1994. At no time prior to that date was I ever contacted by anyone from Chrysler Corporation, claiming in any way to be investigating this matter or who asked me any questions which would in any way relate to my alleged role in this case. Had I been contacted by any Chrysler investigator, I would have freely shared with them all of the information which is contained in this Affidavit.

15. On February 8, 1995, I had a brief conversation with Joseph C. Marshall, III, attorney for Chrysler Corporation in this matter. Our conversation concerned the rescheduling of my deposition to be taken in this case. During the course of said conversation, which I initiated, I indicated to Mr. Marshall that I did not believe a subpoena was necessary and that I have always been willing to discuss these matters or, indeed, anything related to Chrysler with him or any Chrysler investigator or attorney at any time. Mr. Marshall replied that he had not contacted me because he did not know how to contact me. This statement by Mr. Marshall is untrue. I am personally acquainted with many attorneys employed by Chrysler Corporation including Leroy Ritchie, their Vice-President for Legal Affairs. I am also acquainted with Michael J. Krotzke whose Affidavit is attached to Chrysler's Verified Complaint in this case. I am quite certain that if Chrysler's legal staff or investigators wanted to speak with me at

any time regarding Paul Sheridan, or any other matter, they knew exactly where to find me, i.e., at Garrity Motors, phone number: 313-893-8300.

16. Mr. Sheridan has confided in me several concerns he has regarding the safety of Chrysler's minivans. Mr. Sheridan has expressed to me frustration over his inability to convince Chrysler management to act upon these concerns. Mr. Sheridan stated words to the effect that he should directly report to governmental agencies vehicle defects or other potential violations of the law. I suggested that he consider direct or indirect approaches to Mr. Robert Eaton, the current Chairman of Chrysler Corporation. At no time, did any option I discussed with Mr. Sheridan include direct or indirect approaches to any member of the press or other media.

FURTHER, DEPONENT SAITH NOT.


SEYMOUR KLIGER

Subscribed and sworn to before me
this 10th day of FEBRUARY
1995
Thomas F. Tinkovsk
NOTARY PUBLIC

My Commission Expires 12/31/97
Marysville, Liberty County, MI

(1) Q: In this Complaint, it is alleged that Mr.
(2) Sheridan gave a crash test document to a third
(3) party?

(4) A: Well, it sure as hell wasn't me. I can tell you
(5) that.

(6) MR. MORGAN: Mr. Marshall, I'm going to
(7) ask you can you give us a copy of the alleged
(8) crash test document that was given so I can show
(9) it to the witness and verify that, in fact, he's
(10) never seen it, and it was not given to him, and
(11) he did not give it to Mr. Bohn?

(12) MR. MARSHALL: No.

(13) MR. MORGAN: You refuse to do that?

(14) MR. MARSHALL: I refuse to do it.

(15) MR. MORGAN: You want to keep that
(16) secret, do you? You don't think I'm entitled to
(17) the evidence in this case?

(18) MR. MARSHALL: Isn't this your
(19) examination of this witness?

(20) MR. MORGAN: I'm asking you.

(21) MR. MARSHALL: I'm not —

(22) MR. MORGAN: I'm giving you an
(23) opportunity, because you will be in front of the
(24) Court, and you will have to explain your actions
(25) in this case. I'm giving you an opportunity —

(1) month — and forty-three years I've been
(2) associated with Chrysler — all with Dodge
(3) thirty-six years of — virtually all forty-three
(4) with the same company, and thirty-six years at
(5) the same location, that this is the second time
(6) in my life I've been deposed.

(7) The first time in my life when I was
(8) deposed, it happened to involve an employee case,
(9) again, which involved Mr. Cunningham. And at
(10) that time, I called Mr. Greg Mazingo, and I
(11) happened to have files because it was concerning
(12) this velocity project, and I'll never forget. I
(13) went right into Mr. Mazingo's office and took him
(14) three cartons of documents — do you follow me —
(15) on this velocity. And I said, "Greg, I want you
(16) to know one thing. I'm on the side of what's
(17) right. I'm on Chrysler's team. In this
(18) particular case, Chrysler has done this wrong.
(19) They have spent over — it's actually — I'm
(20) going to say many millions because I don't want
(21) to be challenged — but it was about forty
(22) million dollars they paid to an outside
(23) consulting agency at the rate of thirty-five
(24) thousand three hundred per month, per consultant.
(25) And virtually — like I say, Mr. Cunningham's

(1) MR. MARSHALL: I welcome the
(2) opportunity to go in front of the Court. I can't
(3) wait.

(4) MR. MORGAN: I'll bet.

(5) BY MR. MORGAN:

(6) Q: Mr. Kliger, the allegations in this Complaint
(7) which allege that you received a document from
(8) Mr. Sheridan, and that Mr. Sheridan — or that
(9) you in turn gave the document regarding crash
(10) test results to Mr. Bohn, are false allegations,
(11) are they not, sir?

(12) A: They are totally untrue.

(13) THE WITNESS: Mr. Marshall, I'll just
(14) tell you. Should I die where I'm sitting if I'm
(15) lying to you. I never received any crash test
(16) documents from Mr. Sheridan, nor did I pass — do
(17) you follow me — any crash test documents to Mr.
(18) Bohn.

(19) BY MR. MORGAN:

(20) Q: And Mr. Kliger, had anyone from Chrysler bothered
(21) to ask you that before December 27, 1994, would
(22) you have told them that you are not the source of

(23) A: Absolutely. This is the second time in my life
(24) — and I'm going to be fifty-nine years old next

(1) actions with this particular employee at that
(2) time, if you ever pull the files out — if you
(3) call Greg Mazingo, Greg will tell you that I
(4) walked in there just like I would have if you
(5) would have called me or any investigator — if
(6) Mr. Krotche would have called me, I would have
(7) been over — do you follow me — immediately, or
(8) talked to them — do you follow me — immediately
(9) on this.

(10) So I mean, I wasn't hard to find, and I
(11) really and truly — I feel almost insulted as to
(12) the fact that if somebody from Chrysler wanted to
(13) get me, including Mr. Ted Cunningham, they knew
(14) where to go.

(15) BY MR. MORGAN:

(16) Q: Well, imagine how Mr. Sheridan feels.

(17) Mr. Kliger, we're going to stop the
(18) questioning now because it is five o'clock. I
(19) will take this up with you. We will pick another
(20) appropriate date that is convenient to everyone's
(21) schedule to complete this.

(22) A: Yes.

(23) Q: If you do find that file that you've referred to
(24) here earlier today that you've been looking for
(25) that contains correspondence from Chrysler which