

**UNITED STATES DISTRICT COURT
IN THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

FRANCIS A. AHLBERG, et al.,

Plaintiffs,

Case No. 4:04-CV-60104

vs.

Magistrate Judge Thomas J. Shields

CHRYSLER CORPORATION, et al.,

Defendants.

AFFIDAVIT OF ROBERT A. LUTZ

State of Michigan)
)
County of Wayne)

Robert A. Lutz, first being duly sworn, deposes and says:

1. The statements in this Affidavit are based on my personal knowledge except where stated to have been made upon information, and with respect to those, I believe them to be true.
2. I am the Vice Chairman, Global Product Development of General Motors Corporation ("General Motors").
3. In my capacity as Vice Chairman, Global Product Development, I have responsibility for the General Motors Design Center, General Motors Global Engineering, Global Program Management, and Global Product Planning.
4. In addition to my duties as Vice Chairman, I serve as the Chairman of the Automotive Product Board and as a member of the Automotive Strategy Board, two of General Motors' principal management decision-making bodies.

5. From 1986 to 1998, I was employed by Chrysler Corporation where I became President and Chief Operating Officer and later Vice Chairman.

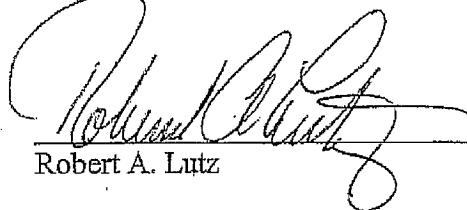
6. I have been informed that the attorneys for Francis A. Ahlberg and Michael Glenn (collectively, the "Plaintiffs") have served a subpoena to take my deposition in a products liability lawsuit filed by them against Defendants Chrysler Corporation and DaimlerChrysler Corporation (collectively, "DCC") and pending in the United States District Court for the Southern District of Iowa.

7. I have also been informed that the lawsuit involves allegations about the decision by DCC not to install a device known as brake transmission switch interlocks ("BTSI devices") in the 1999 Dodge Ram pickup truck manufactured and sold by DCC that is the subject of the underlying lawsuit.

8. During the course of my employment with Chrysler Corporation, I was not involved in any decisions regarding the use of BTSIs in DCC vehicles and have no first-hand knowledge relative thereto.

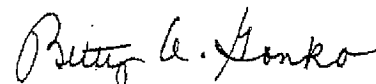
9. An oral deposition in this case would be very burdensome due to my very busy schedule and extensive responsibilities with General Motors.

Further affiant sayeth not.



Robert A. Lutz

Subscribed to and sworn before me
this 27th day of June 2005.



Notary Public

BETTY A. GONKO
NOTARY PUBLIC OAKLAND CO., MI
MY COMMISSION EXPIRES Jul 2, 2005
(ACTING IN WAYNE Co., MI)