

contact Joseph Bohn at the Automotive News.

4. After passing messages with him a couple of times, I finally did have an opportunity to speak with Mr. Bohn during the afternoon hours of February 7, 1995. During my conversation with Mr. Bohn, I identified myself as the attorney for Paul Sheridan. I indicated to him that an article written by Mr. Bohn had been referred to in Chrysler's Verified Complaint against Mr. Sheridan. I further indicated to him that the Verified Complaint alleged that Mr. Sheridan had given certain crash test results documents to a third party, whom I believed to be Seymour Kliger, and that the Verified Complaint further alleged that Mr. Kliger had given the crash test results documents to Mr. Bohn.

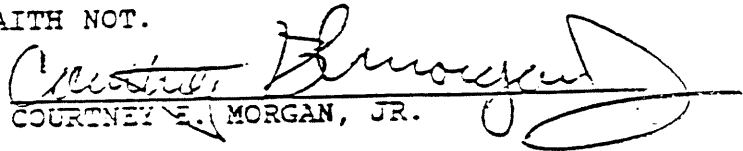
5. Mr. Bohn stated in no uncertain terms that such allegations were untrue. Mr. Bohn further stated that he would not discuss with me anything else about his article or his research for it citing confidentiality of sources under the First Amendment. I asked Mr. Bohn if he would sign an Affidavit attesting to the fact that these allegations made by Chrysler were and are untrue. He stated that he would. I stated to Mr. Bohn that I would transmit to him a copy of the Verified Complaint, together with the supporting Affidavits attached thereto, a copy of Mr. Sheridan's Answer and an Affidavit for him to sign. Mr. Bohn gave me his home address to send these items to. I indicated to him that because of the time element involved, I may even bring the documents to his address myself.

6. I, in fact, did go to Mr. Bohn's home on February 7, 1995, at approximately 7:00 p.m. When I arrived there and identified myself,

Mr. Bohn indicated that while he was sorry and he really wanted to help, upon the advice of counsel, he could not sign the Affidavit as it might be construed or argued to be a waiver of his privileges under the law. I asked if he had been contacted by Chrysler regarding Mr. Sheridan or this case. He stated no, he had not. I indicated that based upon all of the statements made to me by him that a subpoena for his testimony would be necessary. He indicated he would resist the subpoena. I then left his home.

7. I have had no contact with Mr. Bohn since that time other than to secure the name and telephone number of his lawyer.

FURTHER, DEPONENT SAITH NOT.


COURTNEY E. MORGAN, JR.

Subscribed and sworn to before me
this 17th day of February
1995.

MARIE E. NICKOWSKI
NOTARY PUBLIC
IN ALCOA COUNTY, MICHIGAN
MY COMMISSION EXPIRES: 3-20-92

NOTARY PUBLIC STATE OF MICHIGAN, 1987

5