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28 September 2010

BY EMAIL AND FEDEX GROUND

Ms. Angel M. DeFilippo, Esq.
Grieco Oates & DeFilippo, LLC
414 Eagle Rock Avenue
West Orange, NJ 07052
973-243-2099

**Subject: Document Reliance/Review Report :
Expert Witness Report-Preliminary, November 30, 2009**

Reference: Estate of Susan Morris Kline v. Chrysler LLC, Loman Auto Group, et al.

Dear Ms. DeFilippo:

Per your request I am attaching a 'Document Reliance/Review Report' which summarizes those documents that I relied upon, reviewed or was familiar-with prior to submitting my 'Expert Witness Report - Preliminary,' dated November 30, 2009.

Specifically, I am also responding to the follow-up email sent to me by Ms. Karen Feldman on Friday, September 17, 2010 at 12:47 pm, which forwarded the following request wording from defense counsel:

"Identify all documents reviewed or otherwise relied upon in preparing your November 30, 2009 report."

Please do not hesitate to contact me at any time.

Respectfully yours,

Paul V. Sheridan

Attachment

cc: Karen R. Feldman
Neil Hannemann
Courtney E. Morgan, Esq.
Donald R. Phillips, PE

Paul V. Sheridan Expert Witness Report – Preliminary
Estate of Susan Morris Kline v. Chrysler, Loman Auto Group, et al.

Document Reliance/Review Report (Five Pages)

1993 through 1996 Jeep Grand Cherokee service manuals.

1999 through 2004 Jeep Grand Cherokee service manuals.

2005 through 2009 Jeep Grand Cherokee service manuals.

1998 through 2009 Dodge Durango service manuals.

1991 through 2008 Ford Explorer service manuals.

1992 through 2008 Ford Crown Victoria, Mercury Grand Marquis and Lincoln Town Car service manuals.

1991 through 1999 Subaru Legacy service manuals.

1998 through 2004 Mercedes-Benz M-Class SUV service manuals.

Various editions of MOPAR Expressions magazine.

MOPAR Accessories dealership catalogs for the ZJ version of the Jeep Grand Cherokee.

Court filings, court orders, court transcripts, and legal correspondence, etc. relating to the litigation of Kline v Chrysler LLC, Loman Auto Group, et al., that occurred/existed through November 30, 2010.

Police traffic accident report of February 24, 2007 (Susan V. Morris-Kline, et al.).

Chrysler Truck Dealer Visit Program, 1986 Phase 1 Summary report.

Court filings, court orders, court transcripts, and legal correspondence, etc. relating to the litigation of Chrysler v. Sheridan

Court filings, court orders, court transcripts, and legal correspondence, etc. relating to the litigation of Sheridan v. Chrysler.

Gala invitation sent by Mr. Lewis H. Goldfarb (formerly Chrysler and DaimlerChrysler lead product liability attorney) from his employer, defense firm Fulbright Center Hogan & Hartson L.L.P., regarding (former Chrysler and DaimlerChrysler product liability attorney) Ms. Jackie Glassman appointment as ‘Chief Counsel of the National Highway Traffic Safety Administration’

Court filings, court orders, court transcripts, and legal correspondence, etc. relating to the litigation of Gillespie v. DaimlerChrysler, et al.

Court filings, court orders, court transcripts, and legal correspondence, etc. relating to the litigation of Mohr v. DaimlerChrysler, et al., including but not limited to Court of Appeals in Tennessee at Jackson ruling of October 14, 2008, # W2006-01382-COA-R3-CV.

Court filings, court orders, court transcripts, and legal correspondence, etc. and various news media reports relating to the calendar-year 2009 bankruptcy filings and government bailout of Chrysler LLC.

All Safety Leadership Team (SLT) documents and file materials created during the time period January 27, 1993 through November 3/November 7, 1994.

File documents contained in the Chrysler office of Paul V. Sheridan on December 16, 1994 (e.g. Baker to Sinclair memo of August 24, 1978, Chrysler 'Fuel Supply System Design Guidelines.' FMVSS-301 file, 'Rear Crash Survivability – General,' etc.).

NHTSA Federal Motor Vehicle Safety Standard 301 (FMVSS-301) "Fuel System Integrity" documents and reports.

Fire & Materials Communication "Human Survivability in Motor Vehicle Fires" by Digges, Gann, Grayson, et al., dated December 7, 2007.

Photographs taken on April 1 and 2, 2009 at the vehicle inspection of same dates of the 1996 Jeep Grand Cherokee formerly driven by Susan Morris-Kline.

Chrysler Personnel Office 'Employee Performance Appraisal' for Paul V. Sheridan of 1991.

Attachments A through G to my report entitled 'Expert Witness Report – Preliminary,' dated November 30, 2009.

Jeep-Truck Engineering (JTE) organizations charts dated from approximately September 1987 through December 1990.

1996 Dodge Caravan dealership/sales brochure.

Various Jeep-Truck Engineering (JTE) 'Engineering Program Review Summary' reports.

SAE International paper, "A Research Program of Crash Induced Fire Safety" by Digges, Stephenson and Bedewi, #2004-01-0475.

DaimlerChrysler "Safety Recall No. A10 – Fuel Tank Blocker Bracket."

Correspondence between Chrysler counsel and Muth Technologies.

Deposition transcript of Francois J. Castaing of May 19, 1999.

Deposition transcript of Francois J. Castaing of March 14, 1996.

Deposition transcript of Gregory J. Ridella of November 11, 1996.

Deposition transcript of Robert Eaton of January 24, 2001.

Deposition transcript of Judson B. Estes of May 26, 2005.

Deposition transcript of Judson B. Estes of May 27, 2005.

Deposition transcript of Robert D. Banta of July 31, 2007.

Deposition transcript of Stephen D. Lazarus of May 26, 2005.

Sworn affidavit of John M. Fonger of March 22, 1995.

Correspondence of November 22, 2002 from Madeleine Johnson, Esq. to Mr. Dennis Ross, Esq.

Correspondence of December 28, 1994 from Gregory J. Ridella, Esq. to Michael L. Pitt, Esq.

Correspondence of January 5, 1995 from Joseph J. Trotta to Paul V. Sheridan.

Correspondence of March 29, 1995 from Michael Mattei, Blue Cross-Blue Shield, to Paul V. Sheridan.

Automotive News article dated November 12, 2001 entitled, "Lutz's Supplier Side."

Chrysler Corporation presentation by Tom Sidlik, Executive Vice President – Procurement & Supply, dated 1999 (approximate) regarding the 'Chrysler Extended Enterprise™.'

Presentation Discussion Materials Regarding Project Blitz' authored by Goldman-Sachs International on October 4, 1995.

Presentation 'Project Blitz: Discussion Materials for Meeting with Dr. Eckhard Cordes' authored by Goldman-Sachs International on August 9, 1997.

Court filings, court orders, court transcripts, and numerous news reports, etc. relating to the litigation of Kerkorian v DaimlerChrysler.

Correspondence of July 20, 1995 from Dale E. Dawkins to Ronald R. Boltz and Francois L. Castaing, and openly copied to Thomas G. Denomme and Lewis H. Goldfarb.

Correspondence of June 14, 1999 from Jamie F. Jameson to 'All Sales and Marketing Operations Personnel' relating to subject 'June 8 - Global Sales and Marketing Meeting.'

Meeting minutes of the Laminated Side Glass Task Force dated June 30, 1998.

Meeting minutes of the Laminated Side Glass Task Force dated July 16, 1998.

Reference Manual for 'Potential Failure Mode and Effects Analysis (FMEA),' originally issued 1993, revised 1995, authored by engineering representatives from Chrysler Corporation, Ford Motor Company, and General Motors.

Ford Motor Company Service Parts Division Service Procedure #01-21-14.

Various aftermarket promotional sales and technical materials relating to availability of Jeep fuel tank skid plates.

Florida Traffic Crash Report Long Form #76967425, dated 10/11/2007.

Florida Highway Patrol Traffic Homicide 'Field Notes' by Corporal David Krantz, #FHP707-64-031, dated 10/11/2007.

Ford Motor Company Service Instruction for 'Optional Upgrade Kit,' #SK3W73-19G376-AA.

Ford Motor Company correspondence of September 2005 from Frank M. Ligon, Director of Ford Service Engineering Operations, to couch, taxi and transportation services companies.

Correspondence of June 14, 1991 from D. M. Patrick, Manager of Technical Cost Planning, to Ronald R. Boltz, Francois J. Castaing, Robert A. Lutz, et al, relating to competitive vehicle teardown studies.

2002 study entitled, 'The Daimler Chrysler Merger,' by the Tuck School of Business at Dartmouth College Professor Sydney Finkelstein, # 1-0071.

1999 publication by Mitchell International entitled, 'Body Builder's Frame Guide.'

Chrysler dealer screenshot of DealerConnect for "XEE" option code content and applications listing.

Correspondence of April 24, 2009 from Chuck Eddy, NADA Representative to the Chrysler National Dealer Council, Jim Arrigo, Co-Chair, Chrysler National Dealer Council, Hayden Elder, Co-Chair, Chrysler National Dealer Council, Andrew Koblenz and James Moors, National Automobile Dealers Association, to "All Chrysler Dealers."

2008 edition of National Automobile Dealers Association 'Code of Ethics.'

2008 edition of National Automobile Dealers Association 'Ethics Guide.'

National Highway Traffic Safety Administration (NHTSA) 'Trip Report' of May 10, 1995, interview of Paul V. Sheridan.

Correspondence from Coleman R. Sachs, Esq., NHTSA Staff Attorney, to Paul V. Sheridan, dated December 10, 1996.

Various correspondence from Chrysler outside suppliers regarding 'Federal Motor Vehicle Safety Standards – Compliance Submissions.'

Correspondence from Mikal C. Watts, Esq. to Thomas Kienbaum, Esq., dated March 24, 2000.

Various website pages of the Loman Auto Group circa May 2009.

Court order issued by the State Court of Gwinnett County, State of Georgia, in the litigation of Dize v DaimlerChrysler, dated December 3, 2001.

Chrysler Corporation Engineering Standard 'PS-7000: Outside Designed and Developed Items (ODD Box Items) Abstract,' originally issued on October 25, 1979, revised June 26, 1995.

1984, 1985, 1986, 1987, 1990 and 1991 editions of the Dodge 'Engineering Book of Knowledge' (EBOK).

Chrysler Corporation Honda Study Team report entitled, 'Honda Study – Phase III,' dated February 1, 1988.

Chrysler Corporation report entitled, 'Introduction to ABC/ABM and Review Status of ABC at Chrysler – Corporate Training Class,' dated November 1992.

Chrysler Corporation report entitled, 'Corporate Business Group Charter,' dated February 28, 1985.

Chrysler Technical Architecture Questionnaire #SP7DFD-0600 entitled, 'CAIR Mirror Server for Legal Discovery,' dated September 13, 1999.

Customer Assistance Inquiry Request (CAIR) definitions page authored by Peter Edghill, dated October 9, 2000.

DaimlerChrysler Quality Management System Procedure document # NCROP-001, revision #4, dated November 24, 1997.

DaimlerChrysler Quality Management System Procedure document # NCROP-004, revision #4, dated November 24, 1997.

Paul V. Sheridan
September 28, 2010