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BY EMAIL AND FEDEX

Mr. John M. Merritt  
Merritt & Associates, P.C.  
917 North Robinson Street  
Oklahoma City, OK 73102  
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**Reference: Schnaibel v Chrysler, L.L.C.**

**Subject: General Automotive Safety Management - Expert Testimony Report**

Dear Mr. Merritt:

Pursuant to the procedures of the Honorable Court, I am reporting those items and/or topics that I *anticipate* will comprise testimony I will give if called to do so in the subject litigation. This report is preliminary but includes the salient topics already testified to, by me, in prior similar litigations involving Chrysler minivans. Please inform me if the Honorable Court needs or requests any supplementation.

GENERAL BACKGROUND TOPICS

1. Educational background.
2. Vocational automotive experience.
3. Professional automotive experience, including but not limited to:
  - A. Employment at Ford Motor Company (1980 to 1984)
    - i. Experience at Ford as ‘Corporate Average Fuel Economy’ (CAFÉ) powertrain planning analyst.
  - B. Employment at Chrysler Corporation (1984 to 1994)
    - i. Acquisition Management Experience (Chrysler/American Motors)
    - i. Experience with Chrysler AS-Body minivan programs
    - ii. Experience with Chrysler NS-Body minivan programs
      - a. Inputs to NS-Body program approval of \$2.6 billion
4. Ongoing professional and vocational activity in automotive industry:
  - A. Winner of Association of Trial Lawyers of America “*National Champion Award*” for 2005 for work in General Automotive Safety Management.

MINIVAN SAFETY LEADERSHIP TEAM (SLT) - GENERAL

5. Market and legal conditions which led to formation of the “first of its kind” Chrysler Corporation minivan Safety Leadership Team (SLT).
6. Purpose of, and events/market conditions during SLT activity.
7. Events which led to the disbanding of the Chrysler minivan Safety Leadership Team (SLT).

MINIVAN SAFETY LEADERSHIP TEAM (SLT) - SPECIFIC ACTIVITY

8. SLT Activity leading to recommendations regarding minivan liftgate latch safety defect.
9. SLT Activity leading to seatback strength revisions recommendations:
  - A. SLT knowledge of then-existing in-field seatback failures in Chrysler vehicles
  - B. SLT knowledge of then-existing litigation regarding in-field seatback failures in Chrysler vehicles, including review of both severe injury and death cases.
    - A. SLT viewing of *60 Minutes* television program video tape on March 16, 1993, and SLT comments regarding inadequacy of FMVSS-207.
    - B. Authorship and distribution of meeting minutes of SLT meeting of March 16, 1993.
    - C. Executive management “retrieve and destroy” demand regarding meeting minutes of SLT meeting of March 16, 1993.
10. SLT activity leading to and contents of minivan ‘Focus Group’ research of November 1993.
11. SLT activity leading to and contents of minivan ‘Clinic’ research of May/June 1994.
12. SLT recommendations regarding crashworthiness of NS-Body minivan:
  - A. National Highway Traffic Safety Administration (NHTSA) New Car Assessment Program,
  - B. Contact/communication/visitation with the Insurance Institute for Highway Safety (IIHS),
13. Minivan Safety Leadership Team (SLT) documents, and other office file materials.
14. Paul V. Sheridan/Chrysler office floppy disk and other computer memory device content.
  - A. Review of events leading to the review of such in Mohr v. Chrysler litigation.
15. Federal Motor Vehicle Safety Standard (FMVSS) crashworthiness compliance minimums.
16. NS-Body program FMVSS-208 crash test failures and related activity.
17. FMVSS-207.

OTHER INTERNAL DAIMLERCHRYSLER CORPORATION MINIVAN PROGRAMS RELATED ACTIVITY

18. Activity of the Minivan Operations group including but not limited to Minivan “Product Plan,” development and documentation.
19. Chrysler platform organization including the Minivan Platform Team (MPT).
20. NS-Body Product Strategy Team (PST), undersigned was prior PST secretary.
21. Minivan Complexity Team (MCT), undersigned was prior MCT chairman.
22. Minivan Product Direction Team (PDT), undersigned was prior PDT member.
23. Product Planning Sub-committee.
24. Product Planning Committee (PPC).
25. SLT assistance to the Chrysler Legal Staff regarding 1995 Ford Windstar safety leadership claims.
26. Minivan Program Objectives summary (a.k.a. “12-Panel Chart”) and related rejected SLT proposals.
27. Component/system acquisitions under Chrysler supplier relations (aka “extended enterprise”):
  - A. PS-7000
28. Chrysler competitive truck and car product analysis process:
  - A. Leading to DaimlerBenz AG and Chrysler Corporation “merger of equals.”
29. Purpose/activity of the DaimlerChrysler Office of Regulatory Affairs (aka “Safety Office”)

OTHER SUBJECT RELEVANT ISSUES

30. NS-Body program FMVSS-214 crash tests, and subsequent NHTSA investigations.
31. NS-Body program FMVSS-208 crash tests, and subsequent NHTSA investigations:
  - A. DaimlerChrysler failure to attain internal NS-Body minivan crashworthiness objectives
32. DaimlerChrysler activity with U. S. Department of Justice (DOJ) during NHTSA investigations.
33. DaimlerChrysler and NHTSA government personnel employment practices.
34. Chrysler lawsuit and the issuance of an *ex parte* “muzzle order” against my person during NHTSA minivan safety defect investigation:
  - A. Review of NHTSA interview of my person in April 1995
35. The Chrysler Corporation “damages claim” lawsuit against me for \$82 million:
  - A. Voluntary withdrawal of claim by Chrysler Corporation.
36. Dissolution of the original 1994 *ex parte* Chrysler “muzzle order” and all related subsequent activity and documents relevant to Chrysler attempts to “re-muzzle” my testimony during 2000.

PRIOR TRIAL/DEPOSITION TESTIMONY REGARDING DAIMLERCHRYSLER MINIVANS

37. My prior trial/deposition testimony in-behalf of plaintiffs, including but not limited to:
- A. Jimenez v. Chrysler, et al.
  - B. Baird v. Chrysler, et al.
  - C. LeCompte v Chrysler, et al.
  - D. Manes v Chrysler, et al.
  - E. Heider v Chrysler, et al.
  - F. Flax v. Chrysler, et al.
  - G. Mohr v Chrysler, et al.
  - H. Aldridge v. Chrysler, et al.

Please do not hesitate to contact me at any time at the address listed above regarding the subject.

Respectfully,

Paul V. Sheridan

cc: C. E. Morgan