

Customer Assistance Inquiry Record Database (CAIR)
Manipulation by General Counsel's Office

xx. Please produce without limitation the identity and current contact information of all Senior Staff Agents assigned to the Chrysler Customer Assistance Center during calendar years 1992, 1993, 1994, 1995, 1996, 1997, 1998, 1999, 2000, 2001, 2002, 2003, 2004, 2005, 2006, 2007, 2008, and 2009.

ANSWER

xx. Please produce without limitation the identity and current contact information of all Senior Staff Managers to Chrysler Customer Assistance Center during calendar years 1992, 1993, 1994, 1995, 1996, 1997, 1998, 1999, 2000, 2001, 2002, 2003, 2004, 2005, 2006, 2007, 2008, and 2009.

ANSWER

xx. Please produce without limitation the identities and current contact information of the Manager, Chrysler Customer Assistance Center (i.e. the person with overall responsibility for the Chrysler Customer Assistance Center) who held that position during calendar years 1992, 1993, 1994, 1995, 1996, 1997, 1998, 1999, 2000, 2001, 2002, 2003, 2004, 2005, 2006, 2007, 2008, and 2009.

ANSWER

xx. Please produce without limitation the identity and current contact information of all engineers, managers and staff employed with the Chrysler Service Technical Assistance Resource group (aka STAR), who held those positions during calendar years 1992, 1993, 1994, 1995, 1996, 1997, 1998, 1999, 2000, 2001, 2002, 2003, 2004, 2005, 2006, 2007, 2008, and 2009.

ANSWER

xx. Please produce without limitation the identity and current contact information of all staff employed with the Chrysler Special Investigations group of the Chrysler Customer Assistance Center (CAIR), who held those positions during calendar years 1992, 1993, 1994, 1995, 1996, 1997, 1998, 1999, 2000, 2001, 2002, 2003, 2004, 2005, 2006, 2007, 2008, and 2009.

ANSWER

xx. Please produce without limitation the identity and current contact information of all Telephone Systems Administrators employed with the Chrysler National Customer

Relations office/department, who held those positions during calendar years 1992, 1993, 1994, 1995, 1996, 1997, 1998, 1999, 2000, 2001, 2002, 2003, 2004, 2005, 2006, 2007, 2008, and 2009.

ANSWER

xx. Please produce without limitation the identity and current contact information of all Chrysler employees who were involved with the creation of, the maintenance of, or the day-to-day operation of the Chrysler Customer Assistance Inquiry Record database (aka CAIR), and who held those positions during calendar years 1992, 1993, 1994, 1995, 1996, 1997, 1998, 1999, 2000, 2001, 2002, 2003, 2004, 2005, 2006, 2007, 2008, and 2009.

ANSWER

xx. Please produce without limitation a hardcopy download of all Chrysler CAIR file records concerning or alluding to in any way the subject of the Jeep Grand Cherokee ZJ, WJ AND WK-Body vehicles, as recorded in the Chrysler CAIR database during calendar years 1992, 1993, 1994, 1995, 1996, 1997, 1998, 1999, 2000, 2001, 2002, 2003, 2004, 2005, 2006, 2007, 2008, and 2009.

ANSWER

xx. Please produce without limitation a hardcopy download of all Chrysler CAIR file records concerning or alluding to in any way the subject of the Jeep Grand Cherokee ZJ, WJ AND WK-Body vehicles, as recorded in the Chrysler CAIR database during calendar years 1992, 1993, 1994, 1995, 1996, 1997, 1998, 1999, 2000, 2001, 2002, and 2003, but entered into said DCCAC CAIR database prior to manipulation by the (DaimlerChrysler) General Counsel's Office personnel and by selected outside law firms.

ANSWER

xx. Please produce without limitation a hardcopy download of all CAIR file records concerning or alluding to in any way the subject of the Jeep Grand Cherokee ZJ, WJ AND WK-Body vehicles, as originally recorded in the DCCAC CAIR database during calendar years 1992, 1993, 1994, 1995, 1996, 1997, 1998, 1999, 2000, 2001, 2002, and 2003, but after manipulation by the (Chrysler) General Counsel's Office personnel and by selected outside law firms.

ANSWER

xx. Please produce without limitation all documents, memos, financial summaries, computer records of any format, correspondence of any kind to outside vendors, project summary

sheets, that were created during calendar years 1992, 1993, 1994, 1995, 1996, 1997, 1998, 1999, 2000, 2001, 2002, and 2003, that in any way discuss, propose or describe the creation of, the maintenance of, or the day-to-day operation of the >CAIR Mirror Server for Legal Discovery.

ANSWER

xx. Please produce without limitation all documents, memos, financial summaries, computer records of any format, project summary sheets, correspondence or billing records of any kind to outside vendors, that were created during calendar years 1992, 1993, 1994, 1995, 1996, 1997, 1998, 1999, 2000, 2001, 2002, and 2003, that in any way discuss, propose or describe the creation of, the maintenance of, or the day-to-day operation of any computer data base, computer network, computer server, or any similar automated system used for any form/type of CAIR database maintenance, manipulation or production in response to legal discovery requirements.

ANSWER

xx. Please produce without limitation the identity and current contact information of all current or previous personnel of the Chrysler General Counsel's Office that were involved in any way with the creation of, the maintenance of, or the day-to-day operation of the CAIR Mirror Server for Legal Discovery, and who held those positions during calendar years 1992, 1993, 1994, 1995, 1996, 1997, 1998, 1999, 2000, 2001, 2002, 2003, 2004, 2005, 2006, 2007, 2008, and 2009.

ANSWER

xx. Please provide the current contact information of the following current or former Chrysler executives and/or workers:

Lewis H. Goldfarb

Chris R. Jones

William J. O'Brien III

Susan J. Unger

Vince Morrotti

Jacqueline Glassman

Allan H. Huss

ANSWER

xx. Please identify each and every person who provided information for the answering of these interrogatories, giving full name, address and occupation of same.

ANSWER

xx. For each preceding interrogatory to which an answer has been declined based on the Chrysler contention that response would be excessively burdensome or similarly unreasonable, specify the exact actions necessary to provide an answer, the quantitative measure of claimed burden, and the description of each file containing information necessary for response in sufficient detail to enable a search of such files by Plaintiff.

ANSWER

xx. For each preceding interrogatory to which an answer is not based on all or complete records, specify the exact nature and extent of any record search actually performed, and provide identification sufficient for notice of deposition of each individual who personally performed any such record search.

ANSWER

xx. To the extent that any answer or failure to produce any document has been based on a present lack of information which was at one time known to Chrysler, specify as to each such case the method of initially recording, filing and indexing such information, the location and custodian of such files, the retention period thereof and the established policy of DaimlerChrysler governing records formation and retention.

ANSWER