

DRAFT

NEEDS TO BE RE-NUMBERED ETC!!

PLAINTIFF-S  
REQUEST FOR PRODUCTION OF DOCUMENTS  
REQUEST FOR PRODUCTION OF INFORMATION ??

Please take notice that the following interrogatories and requests for production of documents are submitted to you under the provisions of **TBD NEW JERSEY? rules**. The above-entitled defendant is required to file answers to the interrogatories, requests for production of documents, and requests to admit under oath within **TBD** days after service of them upon you.

When used in these interrogatories, requests to produce, and requests to admit, the term "defendant" or any synonym thereof is intended to and shall embrace and include in addition to said defendant all agents, servants and employees, representatives, private investigators or others who are in possession of or who may have obtained information for or on behalf of the defendant. These answers shall be deemed continuing and supplemental answers shall be required immediately upon receipt thereof if the defendant directly or indirectly obtains further or different information from the time answers are served to the time of trial.

For the purpose of the request for production of documents, the term "document" shall include all writings, drawings, graphs, charts, photographs, stenographic records and recordings and other data compilations from which information can be obtained and translated, if necessary, by the respondent through detective devices into reasonably usable form.

**NOTE: WITH RESPECT TO ANY OBJECTION RAISED BY THE DEFENDANT TO THE PRODUCTION OF DOCUMENTS ON THE BASIS OF PRIVILEGE, DEFENDANT IS TO STATE EACH AND EVERY BASIS FOR SAID OBJECTION. ADDITIONALLY, DEFENDANT IS TO PROVIDE A "PRIVILEGE LOG" WITH THE FOLLOWING INFORMATION:**

- ! THE AUTHOR OF THE DOCUMENT CLAIMED PRIVILEGED;
- ! THE DATE OF THE DOCUMENT CLAIMED PRIVILEGED;
- ! THE RECIPIENTS OF THE DOCUMENT CLAIMED PRIVILEGED; AND
- ! THE SUBJECT MATTER OF THE DOCUMENT CLAIMED PRIVILEGED.

DEFINITIONS

JEEP: The term "Jeep Grand Cherokee", as used in these Requests, refers to the Chrysler manufactured ZJ-Body, WJ-Body and WK-Body series vehicles including the counterpart vehicles and associated designations manufactured or sold in overseas

markets, as well as similar vehicles manufactured or assembled by all other agents of Chrysler, unless otherwise specified.

SAFETY: The word "safety" is defined as the maintenance of the well being of users or bystanders of Chrysler products and the avoidance of and/or prevention of bodily injury or death to users of Chrysler products while using or being in the vicinity of said products.

XX. For each the years 1993, 1994, 1995, 1996, 1997, 1998, 1999, 2000, 2001, 2002, 2003, 2004, 2005, 2006, 2007, and 2008 please state Chrysler's actual results regarding the following items:

- a. The total number of Chrysler Jeep Grand Cherokee series vehicles sold;
- b. The yearly profits from the sales of Chrysler Jeep Grand Cherokee series vehicles;
- c. The overall profitability of Chrysler Corporation.
- d. The economic profit to Chrysler target per average Jeep Grand Cherokee unit sold (prior to overhead allocations, etc.)
- e. The fully accounted profit to Chrysler target per average Jeep Grand Cherokee unit sold (after overhead allocations, etc.)
- f. The fully accounted profit to Chrysler target per average Jeep Grand Cherokee unit sold (after overhead allocations, and after delivery to Chrysler dealerships)

**ANSWER:**

26. For each of the years 1993, 1994, 1995, 1996, 1997, 1998, 1999, 2000, 2001, 2002, 2003, 2004, 2005, 2006, 2007, and 2008 please state whether any portion of Chrysler's budget was allocated for the following items and if so, how much money was so allocated?

- a. Advertising;
- b. Advertising specifically aimed at the Jeep Grand Cherokee series vehicles;
- d. Advertising specifically aimed at safety issues;

- e. Advertising specifically aimed at safety issues involving Jeep Grand Cherokee series vehicles;
- g. Marketing;
- h. Marketing studies, research, and strategies regarding the Jeep Grand Cherokee series vehicles;
- i. Marketing studies, research, and strategies regarding consumer response to safety issues involving the Jeep Grand Cherokee series vehicles;

**ANSWER:**

XX. For each of the years 1993, 1994, 1995, 1996, 1997, 1998, 1999, 2000, 2001, 2002, 2003, 2004, 2005, 2006, 2007, and 2008 please state whether any money was actually spent by Chrysler on each of the following items, and if so, how much money was so spent?

- a. Advertising in the State of New Jersey;
- b. Advertising in the State of New Jersey specifically aimed at the Jeep Grand Cherokee series vehicles;
- d. Advertising in the State of New Jersey specifically aimed at safety issues;
- e. Advertising in the State of New Jersey specifically aimed at safety issues involving Jeep Grand Cherokee series vehicles;
- g. Marketing in the State of New Jersey;
- h. Marketing studies in the State of New Jersey, research, and strategies regarding the Jeep Grand Cherokee series vehicles;
- i. Marketing studies in the State of New Jersey, research, and strategies regarding consumer response to safety issues involving the Jeep Grand Cherokee series vehicles;

**ANSWER:**

XX. Please produce the "Phase I Report" as presented on or about November 9, 1987 by the internal Chrysler group called the Honda Study Team.

**ANSWER:**

XX. Please produce the "Phase II Report" as presented on or about December 17, 1987 by the internal Chrysler group called the Honda Study Team.

**ANSWER:**

XX. Please produce the "Phase III Report" as presented on or about February 1, 1988 by the internal Chrysler group called the Honda Study Team.

**ANSWER:**

65. Please produce all memos, meeting minutes, agendas, presentations, files, video tapes, etc. relating in any way to Jeep Grand Cherokee (ZJ-Body, WJ-Body and WK-Body) customer focus group research conducted by or commissioned by Chrysler at any time during calendar years 1987, 1988, 1989, 1990, 1991, 1992, 1993, 1994, 1995, 1996, 1997, 1998, 1999, 2000, 2001, 2002, 2003, 2004, 2005, 2006, 2007, and 2008.

**ANSWER**

65. Please produce all memos, meeting minutes, agendas, presentations, files, video tapes, etc. relating in any way to Jeep Grand Cherokee (ZJ-Body, WJ-Body and WK-Body) customer clinical research conducted by or commissioned by Chrysler at any time during calendar years 1987, 1988, 1989, 1990, 1991, 1992, 1993, 1994, 1995, 1996, 1997, 1998, 1999, 2000, 2001, 2002, 2003, 2004, 2005, 2006, 2007, and 2008.

**ANSWER**

XX. Please produce all agendas, meeting notes, meeting minutes, reports, presentations, participant/attendee lists, tape recordings, etc. for the Engineering Safety Committee for calendar years 1987, 1988, 1989, 1990, 1991, 1992, 1993, 1994, 1995, 1996, 1997, 1998, 1999, 2000, 2001, and 2002, 2003, 2004, 2005, 2006, 2007, and 2008.

**ANSWER:**

XX. Please produce all agendas, meeting notes, meeting minutes, reports, presentations, participant/attendee lists, attendance records, tape recordings, etc. for the Chrysler Board of Directors meetings for calendar years 1990, 1991, 1992, 1993, 1994, 1995, 1996, 1997, 1998, 1999, 2000, 2001, 2002, 2003, 2004, 2005, 2006, 2007, and 2008.

**ANSWER:**

XX. Please produce all meeting agendas, presentations, memos, notes, etc. relating to any presentation to or by the Product Planning Committee (PPC) as such presentations relate in any way to the Jeep Grand Cherokee, during calendar years 1984, 1985, 1986, 1987, 1988, 1989, 1990, 1991, 1992, 1993, 1994, 1995, 1996, 1997, 1998, 1999, 2000, 2001, 2002, 2003, 2004, 2005, 2006, 2007, and 2008.

**ANSWER**

XX. Please produce all meeting agendas, presentations, memos, notes, etc. relating to any presentation to or by the Product Planning Committee Subcommittee as such presentations relate in any way to the Jeep Grand Cherokee, during calendar years 1984, 1985, 1986, 1987, 1988, 1989, 1990, 1991, 1992, 1993, 1994, 1995, 1996, 1997, 1998, 1999, 2000, 2001 and 2002, 2003, 2004, 2005, 2006, 2007, and 2008.

**ANSWER**

XX. Please produce all iterations of the Jeep Grand Cherokee product plans, sometimes called "Product Plan Book - Change Transmittal" for vehicle model years 1993, 1994, 1995, 1996, 1997, 1998, 1999, 2000, 2001, 2002, 2003, 2004, 2005, 2006, 2007, and 2008.

**ANSWER:**

XX. Please produce all competitive teardown reports as compiled and distributed by either the Chrysler Engineering department or Competitive Teardown or the Chrysler department of Technical Cost Planning, or any similar departments, involving the teardown of any and all competitive sport utility vehicle products, including but not limited to those manufactured by DaimlerBenz (e.g. G-Class, M-Class, ML-Class, etc.), Ford Motor Company (e.g. Explorer, Bronco, et al), General Motors (Chevy Blazer, etc.), Honda Motor Company (Passport, etc.), Toyota Motor Corporation (4Runner, Highlander, etc.), Nissan Motor Company (Pathfinder, etc.), during calendar years 1984, 1985, 1986, 1987, 1988, 1989, 1990, 1991, 1992, 1993, 1994, 1995, 1996, 1997, 1998, 1999, 2000, 2001, 2002, 2003, 2004, 2005, 2006, 2007, and 2008.

**ANSWER:**

XX. Please produce all Daily Sales Report(s) as compiled and distributed by the Chrysler Sales Reporting & Analysis department, or a similar department, during calendar years 1984,

1985, 1986, 1987, 1988, 1989, 1990, 1991, 1992, 1993, 1994, 1995, 1996, 1997, 1998, 1999, 2000, 2001, 2002, 2003, 2004, 2005, 2006, 2007, and 2008.

**ANSWER:**

XX. Please produce all documents, meeting notes, reports, agendas, etc., relating to or that in any way document or relate in any way to Jeep Grand Cherokee "Features and Technology Strategy Alternatives."

**ANSWER:**

XX. Please produce full and complete copies of all Jeep Grand Cherokee Objectives Trip reports as conducted by the Production and Competitive Vehicle Analysis department, or any similar department, conducted during the following calendar years: 1984, 1985, 1986, 1987, 1988, 1989, 1990, 1991, 1992, 1993, 1994, 1995, 1996, 1997, 1998, 1999, 2000, 2001, 2002, 2003, 2004, 2005, 2006, 2007, and 2008.

**ANSWER:**

XX. Please produce all documents, meeting notes, reports, agendas, etc., relating to or that in any way document or relate in any way to the Jeep Grand Cherokee Engineering Program Reviews conducted at >Jeep and Dodge Truck Engineering= during calendar years 1987, 1988, 1989, 1990, 1991, 1992, 1993, 1994, 1995, 1996, 1997, 1998, 1999, 2000, 2001, 2002, 2003, 2004, 2005, 2006, 2007, and 2008.

**ANSWER:**

XX. Please produce all documents, meeting notes, reports, agendas, etc., relating to or that in any way document or relate in any way to the Jeep and Dodge Truck Engineering Quality Council during calendar years 1987, 1988, 1989, 1990, 1991, 1992, 1993, 1994, 1995, 1996, 1997, 1998, 1999, 2000, 2001, 2002, 2003, 2004, 2005, 2006, 2007, and 2008.

**ANSWER:**

XX. Please produce all documents, meeting notes, reports, agendas, etc., relating to or that in any way document or relate in any way to the >Jeep and Dodge Truck Engineering= Quality Improvement Teams during calendar years 1987, 1988, 1989, 1990, 1991, 1992, 1993, 1994, 1995, 1996, 1997, 1998, 1999, 2000, 2001, 2002, 2003, 2004, 2005, 2006, 2007, and 2008.

**ANSWER:**

XX. Please produce all iterations of the Jeep Grand Cherokee Program Objectives Summary, aka the 10-panel Chart, or the 11-panel Chart, or the 12-panel Chart, for vehicle model years 1984, 1985, 1986, 1987, 1988, 1989, 1990, 1991, 1992, 1993, 1994, 1995, 1996, 1997, 1998, 1999, 2000, 2001, 2002, 2003, 2004, 2005, 2006, 2007, and 2008.

**ANSWER:**

XX. Please produce a copy of the Chrysler annual reports to the stockholders for calendar years 1985, 1986, 1987, 1988, 1989, 1990, 1991, 1992, 1993, 1994, 1995, 1996, 1997, 1998, 1999, 2000, 2001, 2002, 2003, 2004, 2005, 2006, 2007, and 2008.

**ANSWER:**

XX. Please produce all documents, meeting notes, reports, agendas, etc., on any format, that in any way document or relate in any way (financial, organizational, sales objectives, etc.) to the 'Post Merger Integration' or PMI effort for or conducted by any DaimlerChrysler AG groups including but not limited to the Chrysler Group, during calendar years 1995, 1996, 1997, 1998, 1999, 2000, 2001, 2002, 2003, 2004, 2005 and 2006.

**ANSWER:**

XX. Please produce all memos, video tapes, etc. sent from any member of the National Highway Traffic Safety Administration (NHTSA) to any member of the Chrysler staffs that relate in any way to the Jeep Grand Cherokee; sent during any of the calendar years 1985, 1986, 1987, 1988, 1989, 1990, 1991, 1992, 1993, 1994, 1995, 1996, 1997, 1998, 1999, 2000, 2001, 2002, 2003, 2004, 2005, 2006, 2007, and 2008.

**ANSWER:**

XX. Please produce all memos, video tapes, etc. sent by any member of the Chrysler staffs to any member of the National Highway Traffic Safety Administration (NHTSA) that relate in any way to the Jeep Grand Cherokee; sent during any of the calendar years 1985, 1986, 1987, 1988, 1989, 1990, 1991, 1992, 1993, 1994, 1995, 1996, 1997, 1998, 1999, 2000, 2001, 2002, 2003, 2004, 2005, 2006, 2007, and 2008.

**ANSWER:**

XX. Please produce all Chrysler correspondence, financial

documents, memos, blueprints, video tapes, test data, etc. that relate in any way to the listed components or systems of the Jeep Grand Cherokee, created by Chrysler during calendar years 1987, 1988, 1989, 1990, 1991, 1992, 1993, 1994, 1995, 1996, 1997, 1998, 1999, 2000, 2001, 2002, 2003, 2004, 2005, 2006, 2006, 2008:

Fuel Tank

Fuel Pump

Fuel Tanks attachment hardware and all related components

Fuel Lines

Fuel Filter

Fuel Filler Neck and all related components

Trailer Hitch and all related components

Rear Frame and all related components

Rear Body Sheet Metal and all related components

Electrical components and all related wiring and components of any kind located in the rear portion of Jeep Grand Cherokee (e.g. brake lamps, license plate illumination, fuel pump electric power supply, etc.)

FMVSS-301 certification

FMVSS-214 certification

FMVSS-208 certification

**ANSWER**

222. Please produce all Chrysler correspondence, financial documents, memos, blueprints, video tapes, etc. sent to any previous or existing or future supplier(s) of any of the listed components or systems of the Jeep Grand Cherokee, created by Chrysler during calendar years 1987, 1988, 1989, 1990, 1991, 1992, 1993, 1994, 1995, 1996, 1997, 1998, 1999, 2000, 2001, 2002, 2003, 2004, 2005, 2006, 2006, 2008:

Fuel Tank

Fuel Pump

Fuel Tanks attachment hardware and all related components



Fuel Lines

Fuel Filter

Fuel Filler Neck and all related components

Trailer Hitch and all related components

Rear Frame and all related components

Rear Body Sheet Metal and all related components

Electrical components and all related wiring and components of any kind located in the rear portion of Jeep Grand Cherokee (e.g. brake lamps, license plate illumination, fuel pump electric power supply, etc.)

**ANSWER**

333. For all items listed in 222, please produce all documentation that relates in any way to any Failure Mode Effects Analysis (FMEA) requested of or demanded of the supplier(s) by Chrysler.

**ANSWER**

XX. Please produce all letters and Technical Service Bulletins (TSB), sent by Chrysler at any time to any Chrysler dealerships that are authorized to sell and/or service the Jeep Grand Cherokee that relate in any way to the listed components or systems of the 1996 Jeep Grand Cherokee:

Fuel Tank

Fuel Pump

Fuel Tanks attachment hardware and all related components

Fuel Lines

Fuel Filter

Fuel Filler Neck and all related components

Trailer Hitch and all related components

Rear Frame and all related components

Rear Body Sheet Metal and all related components

Electrical components and all related wiring and components of any kind located in the rear portion of Jeep Grand Cherokee (e.g. brake lamps, license plate illumination, fuel pump electric power supply, etc.)

**ANSWER**

XX. Please produce all letters and Technical Service Bulletins (TSB), sent by Chrysler at any time to any Chrysler dealerships that are authorized to sell and/or service the Jeep Grand Cherokee that relate in any way to the listed components or systems of any model year Jeep Grand Cherokee:

Fuel Tank

Fuel Pump

Fuel Tanks attachment hardware and all related components

Fuel Lines

Fuel Filter

Fuel Filler Neck and all related components

Trailer Hitch and all related components

Rear Frame and all related components

Rear Body Sheet Metal and all related components

Electrical components and all related wiring and components of any kind located in the rear portion of Jeep Grand Cherokee (e.g. brake lamps, license plate illumination, fuel pump electric power supply, etc.)

**ANSWER**

XX. Please produce a non-redacted complete copy of the Chrysler Engineering Process Standard PS-7000" as originally issued on October 25, 1979.

**ANSWER**

XX. Please produce non-redacted complete copies of all iterations of the Chrysler Engineering Process Standard PS-7000" as edited subsequent to October 25, 1979.

**ANSWER**

XX. Please produce all letters form Jeep Grand Cherokee customer sent at any time to any member of the Chrysler staffs.

**ANSWER:**

XX. Please produce all Chrysler response letters sent to any Jeep Grand Cherokee customers who had initially written letters to any member the Chrysler staff.

**ANSWER:**

XX. Please produce all Chrysler letters written at any time by any member the Chrysler staff, and sent at any time to Jeep Grand Cherokee customers.

**ANSWER:**

XX. Please produce all previous and current organization charts for the Jeep and Dodge Truck Engineering group or groups.

**ANSWER:**

XX. Please provide the current contact information of the following former or existing Chrysler Jeep and Dodge Truck Engineering group executives or workers, and/or Jeep and Dodge Truck Product Planning group executives or workers, and/or Jeep and Dodge Truck Program Management group executives or workers:

Francois J. Castaing.

Owen J. Viergutz.

D. Craig Winn.

George W. Crockatt, III.

David A Nelson.

Charles K. Sestok, III.

Bernard I. Robertson.

Paul R. Shefferly.

Dennis H. Moothart.

Paul B. Hellens.

Walter A. Demattia.

Denis E. Falkowski.

Charles R. Acker.

Richard T. Scott.

Gregory A. Netter.

David Edge.

David S. Vrabel.

Elizabeth G. Brueckner.

Walter A. DeMattia.

D. T. Ballard.

Carlo J. Carlini.

John S. McMahan.

Stephen A. Demay.

Susan M. Ellis.

Denis E. Falkowski.

C. F. Roberts.

Louis Burhart.

Richard B. Moore.

Richard A. Rider.

Victor B. Rensberry.

James J. Kos.

Paul V. Sheridan.

John J. Wasolek.

Susan M. Ellis.

Donald F. Buser.

William T. Cumiskey

John K. Nemeth.

Donald C. MacDonald.

David Perrine.

Ronald E. Wilson.

Richard C. Swando.

John C. Miller.

Christopher P. Theodore.

Jerome B. York.

Dale E. Dawkins.

Paul Smuts.

**ANSWER:**

XX. Please provide the current contact information of the following former or existing Chrysler executives or workers:

Richard M. Posk.

Lee A. Iacocca.

Susan M. Cischke.

Lewis H. Goldfarb.

Jeff Fox.

James R. Julow.

David P. Bostwick.

Robert A. Lutz.

Richard A. Winter.

Roger Garrell.

Herman Greif.

Theodor R Cunningham.

Edmond R. Pappert.  
Steven A. Torok.  
John B. Damoose.  
Gerald Greenwald.  
James W. Finck.  
Thomas G. Denomme.  
Peter C. Badore.  
Robert L. Mocello.  
Robert J. Eaton.  
Richard A. Winter.  
Thomas Gallagher.  
Robert M. Sinclair.  
Ralph A. Sarotte.  
Denis R. Root.  
Kenneth P. Socks.  
Howard W. Roush (Human Resources).

**ANSWER:**

XX. Please produce in hard-copy form, the official current and non-redacted version of what is sometimes called the Chrysler "Personal History Record" or PHR for all the former or existing Chrysler executives or workers as listed in #TBD and #TBD ABOVE.

**ANSWER:**

Please produce without limitation all court orders, all Chrysler court filings including attachments, all Chrysler court briefings including attachments, etc. as filed in the matter of Gillespie v Chrysler Corporation, et al.

**ANSWER:**

XX. Please produce all previous and current organization

charts for the following Jeep and Dodge Truck Engineering group or groups:

Quality Improvement Teams  
Chassis/Drivetrain  
Pre-Program Engineering  
Program Management  
Vehicle Development  
Body Engineering  
Electrical/Electronic Engineering  
Supplier Quality  
Product Financial Analysis  
Safety and Program Management  
Design Aid Facility

**ANSWER:**

XX. Please produce all previous and current organization charts for the following Chrysler group or groups:

Livonia Prototype Build Center  
Livonia Development Center  
Liberty Center  
Featherstone Road Engineering Center  
Toledo Jeep Assembly Plant  
Jefferson Assembly Plant  
Jefferson Assembly Plant - North

**ANSWER:**

XX. Please produce all previous and current organization charts for the following Chrysler Chelsea Proving Grounds group or groups:

Certification and Regulatory Group

Impact T&D Group

Vehicle Test Group

Chassis Dynamics Engineering

Cooling Systems and Wind Tunnel Group

Facilities Services Group

**ANSWER:**

80. Please produce the deposition transcript and all attached exhibits for the deposition of Chrysler executive Gregory J. Ridella taken on 11/11/96 in the matter of Gonzales, et al. vs. Chrysler.

**ANSWER**

81. Please produce the deposition transcript and all attached exhibits for the deposition of Chrysler executive Robert J. Eaton taken on 1/24/01 in the matter of Chin vs. Chrysler.

**ANSWER**

82. Please produce the deposition transcript and all attached exhibits for the deposition of Chrysler executive David P. Bostwick taken on 10/25/00 in the matter of Petty vs. Chrysler.

**ANSWER**

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

**ANSWER**

165. 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**



166. 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**

167. 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 Chrysler governing records formation and retention.

**ANSWER**

93. Please identify each and every person who provided information for the answering of these interrogatories and/or requests-to-produce, giving full name, address and occupation of same.

**ANSWER**

94. 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**

95. For each preceding interrogatory and/or requests-to-produce 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**

96. 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 Chrysler governing records formation and retention.

**ANSWER**