

THOMAS KLINE, AS	:	SUPERIOR COURT OF NEW JERSEY
ADMINISTRATOR AD	:	LAW DIVISION
PROSEQUENDUM OF THE HEIRS AT	:	
LAW OF SUSAN MORRIS KLINE,	:	MORRIS COUNTY
(DECEASED), AS ADMINISTRATOR	:	DOCKET NO. MRS-L-3575-08
OF THE ESTATE OF SUSAN MORRIS	:	
KLINE, and THOMAS KLINE,	:	
INDIVIDUALLY,	:	
	:	CIVIL ACTION
Plaintiff(s),	:	
	:	
v.	:	
	:	
VICTORIA MORGAN-ALCALA,	:	CHRYSLER GROUP LLC'S
CARLOS ALCALA, NATALIE RAWLS,	:	RESPONSES TO NOTICE TO
DAIMLER CHRYSLER	:	PRODUCE DOCUMENTS,
CORPORATION A/K/A CHRYSLER	:	RECORDS AND INFORMATION
CORPORATION, LOMAN AUTO	:	PURSUANT TO RULE 4:18-1
GROUP, JOHN DOES A THROUGH Z,	:	APPENDED TO THE SUBPOENA
(Names being Fictitious), ABC	:	DUCES TECUM
CORPORATIONS, 1 THROUGH 100,	:	
(Names Being Fictitious)	:	
	:	
Defendant(s).	:	

Chrysler Group LLC responds to Plaintiffs' Notice to Produce Documents, Records and Information Pursuant to Rule 4:18-1 appended to the subpoena duces tecum as follows:

PRELIMINARY STATEMENT

On April 30, 2009, Old Carco LLC (f/k/a Chrysler LLC) and certain of its affiliates ("Debtors") filed voluntary petitions for relief in the United States Bankruptcy Court for the Southern District of New York. On June 1, 2009, the Bankruptcy Court issued an Order ("Sales Order") authorizing the sale of substantially all of the debtors'

assets to New CarCo Acquisition LLC, which changed its name to Chrysler Group LLC (hereinafter referred to as "Chrysler Group") on June 10, 2009. Chrysler Group is in possession of records of the former Chrysler LLC, which records are being sought in these requests. Chrysler Group is responding to this notice to produce in the capacity of custodian of records of the former Chrysler LLC.

RESPONSES TO REQUESTS

REQUEST NO. 1: Any and all test specifications, test procedures, test standards, test requirements, testing policies, testing criteria, test reports, test results, test data, test photographs and test films related to the performance of the fuel tank, fuel tank assembly and fuel system installed in the Jeep Grand Cherokee (ZJ), (WJ) and (WK). This request includes, but is not limited to, internal, FMVSS testing, and all tests performed by you and by any third party on your behalf.

- a. Rear crash tests and results without trailer hitch (trailer tow group) and without "Up Country Group" from any source and outsourced for any reason.
- b. All FMVSS 301 rear crash tests and results with either or both trailer hitch (trailer tow group) and "Up Country Group".
- c. Any additional tests beyond the minimum FMVSS 301 requirements.
- d. Any litigation testing and results from previous rear impact post collision fuel fed fires on the Jeep Grand Cherokee (ZJ), (WJ) and (WK).

RESPONSE NO. 1: Chrysler Group understands the term “performance” as used in this request to refer to the performance of the rear components of the fuel system of the Jeep Grand Cherokee (ZJ) in a rear impact collision. Chrysler Group will provide, pursuant to the entry of an appropriate protective order and in image (.pdf) format, a copy of test reports, photographs, and digitized video related to rear barrier impact crash tests conducted during the design and development of the 1993 through 1998 Jeep Grand Cherokee (ZJ), including a copy of test documentation used to confirm compliance of the Jeep Grand Cherokee (ZJ) with Federal Motor Vehicle Safety Standard (FMVSS) 301 – Fuel System Integrity. Chrysler Group will also provide, pursuant to the entry of an appropriate protective order and in image (.pdf) format, a copy of test documentation related to rear impact simulator tests conducted as part of the design and development of the fuel system of the Jeep Grand Cherokee (ZJ). Chrysler Group will also search its records for documents, if any, regarding testing conducted by or on behalf of Chrysler Group and disclosed in litigation related to the performance of the fuel system of the Jeep Grand Cherokee (ZJ) in rear impact collisions. If any such documents are identified, Chrysler Group will provide a copy pursuant to the entry of an appropriate protective order.

Chrysler Group otherwise objects to this request because it is overly broad and seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Chrysler Group specifically objects to this request because it is not limited to the model vehicle at issue in this lawsuit. The Jeep Grand

Cherokee (ZJ) was produced from the 1993 through the 1998 model year. The Jeep Grand Cherokee (WJ) is an all-new vehicle that was produced from the 1999 through the 2004 model year and is substantially different than the Jeep Grand Cherokee (ZJ). The Jeep Grand Cherokee (WK) was first produced for the 2005 model year and is currently produced today. It is an all-new vehicle that is substantially different from the Jeep Grand Cherokee (ZJ) and the Jeep Grand Cherokee (WJ). Further, the Jeep Grand Cherokee (WK) was first produced nine years after the 1996 Jeep Grand Cherokee (ZJ) that is the subject of this lawsuit and seven years after the Jeep Grand Cherokee (ZJ) was discontinued from production. Chrysler Group further objects to this request because it is vague in its use of the term "performance." Chrysler Group further objects to this request to the extent it seeks documents, if any, prepared by or at the direction of counsel in connection with litigation and are therefore protected from disclosure by the attorney-client privilege, the work product doctrine, or the non-testifying consultant rule.

REQUEST NO. 2: All fuel system design guidelines as of the time of the design of the subject 1996 Jeep Grand Cherokee (ZJ).

RESPONSE NO. 2: Chrysler Group will provide, pursuant to the entry of an appropriate protective order and in image (.pdf) format, a copy of the available two-dimensional assembly drawings or graphical representations of the rear components of the fuel system of the 1996 Jeep Grand Cherokee (ZJ), together with related engineering specifications and standards. Chrysler Group will also provide, pursuant to the entry of an appropriate protective order and in image (.pdf) format, a copy of

engineering graphics for the rear components of the fuel system of the 1996 Jeep Grand Cherokee (ZJ). Chrysler Group will also provide, pursuant to the entry of an appropriate protective order and in image (.pdf) format, a copy of its Fuel Supply Systems Design Guidelines.

REQUEST NO. 3: Any and all learned treatises, internal reports, external reports or other data and any other studies or analysis that Chrysler and its engineers and experts contend form the basis of their opinions regarding the advantage of locating the subject vehicle's fuel tank aft of the axle and filler neck through the frame of the subject vehicle, including any material that supports Chrysler's position that locating the fuel tank aft of the axle is more advantageous to occupants than locating the fuel tank in front of the axle.



RESPONSE NO. 3: Chrysler Group is not a party to this lawsuit and has therefore not retained experts to testify at the time of trial of this matter, nor is it making contentions in this lawsuit. To the extent this request seeks documents that demonstrate that the fuel system used in the Jeep Grand Cherokee (ZJ) is a reasonable and safe design, see Chrysler Group's response to Request Nos. 1 and 2.

Chrysler Group otherwise objects to this request because it is overly broad and seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

REQUEST NO. 4: Any and all results, reports, summaries, analysis, evaluations, photographs, films and other documentation of any rear offset impact tests or any under-

ride rear impact collision tests performed by you or by a third party on your behalf involving the Jeep Grand Cherokee (ZJ), (WJ) and (WK).


RESPONSE NO. 4: To the extent Chrysler Group conducted tests as referenced in this request involving the Jeep Grand Cherokee (ZJ), such tests would be included in the documents Chrysler Group has agreed to provide under protective order, in response to Request No. 1. See Chrysler Group's responses and objections to Request Nos. 1 and 4.

Chrysler Group otherwise objects to this request because it is overly broad and seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Chrysler Group specifically objects to this request because it is not limited to the model vehicle at issue in this lawsuit. The Jeep Grand Cherokee (ZJ) was produced from the 1993 through the 1998 model year. The Jeep Grand Cherokee (WJ) is an all-new vehicle that was produced from the 1999 through the 2004 model year and is substantially different than the Jeep Grand Cherokee (ZJ). The Jeep Grand Cherokee (WK) was first produced for the 2005 model year and is currently produced today. It is an all-new vehicle that is substantially different from the Jeep Grand Cherokee (ZJ) and the Jeep Grand Cherokee (WJ). Further, the Jeep Grand Cherokee (WK) was first produced nine years after the 1996 Jeep Grand Cherokee (ZJ) that is the subject of this lawsuit and seven years after the Jeep Grand Cherokee (ZJ) was discontinued from production.



REQUEST NO. 5: Please provide copies of any documents from 1987 to 2007 that pertain to the location of the fuel tank behind the rear axle, as it was in the Kline vehicle.

- a. All Safety Leadership Team files from 1992 to 1994 including all files, computer hard drives and floppy discs maintained by former employee, Paul V. Sheridan. (These were previously produced in *Mohr v. Daimler Chrysler*, Circuit Court of Shelby County, Memphis, TN, 13th Judicial District at Memphis #CT-03-002433-03 Division 9).

RESPONSE NO. 5: See Chrysler Group's responses to Request Nos. 1 and 2. To the extent this request seeks "All Safety Leadership Team files from 1992 to 1994," Chrysler Group believes that this request is intended to seek information about the NS-Body Safety Leadership Team. The NS-body vehicles were Chrysler and Dodge minivans produced from the 1996 through 2000 model years. The Safety Leadership Team came into existence in February 1993 and had as its sole purpose researching customer preferences and recommending consideration of new features in future model year NS-body minivans that were perceived by the consumers to be safety related, which would permit Chrysler LLC to achieve and maintain a legally advertisable claim as the minivan safety leader. The NS-Body Safety Leadership Team was not involved in the design and development of the Jeep Grand Cherokee (ZJ) or the rear components of the fuel system used in the vehicle. 

Chrysler Group otherwise objects to this request because it is overly broad, unduly burdensome, and seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Chrysler Group specifically objects to this request because it is not limited to the model vehicle at issue in this lawsuit or to a relevant time frame.

REQUEST NO. 6: Any and all documents related to any recalls, field campaigns, owner notification programs and warranty claims related to problems and concerns with the fuel tank and fuel tank assembly and fuel system of the Jeep Grand Cherokee (ZJ), (WJ) and (WK).

RESPONSE NO. 6: The subject 1996 Jeep Grand Cherokee (ZJ), VIN 1J4GZ58S9TC401311, was not the subject of any safety related recall campaigns regarding the rear components of the vehicle's fuel system.

Chrysler Group otherwise objects to this request because it is overly broad and seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Chrysler Group specifically objects to this request because it is not limited to the model vehicle at issue in this lawsuit. The Jeep Grand Cherokee (ZJ) was produced from the 1993 through the 1998 model year. The Jeep Grand Cherokee (WJ) is an all-new vehicle that was produced from the 1999 through the 2004 model year and is substantially different than the Jeep Grand Cherokee (ZJ). The Jeep Grand Cherokee (WK) was first produced for the 2005 model year and is currently produced today. It is an all-new vehicle that is substantially different from the Jeep


Grand Cherokee (ZJ) and the Jeep Grand Cherokee (WJ). Further, the Jeep Grand Cherokee (WK) was first produced nine years after the 1996 Jeep Grand Cherokee (ZJ) that is the subject of this lawsuit and seven years after the Jeep Grand Cherokee (ZJ) was discontinued from production. Further, recall campaigns are conducted because of specific conditions affecting specifically identified vehicles; therefore, recall campaigns that did not include the subject 1996 Jeep Grand Cherokee (ZJ), VIN 1J4GZ58S9TC401311, would not provide or lead to information about the condition of the accident vehicle.

REQUEST NO. 7: All service procedures, technical service bulletins and special procedures related to the fuel system of the Jeep Grand Cherokee (ZJ), (WJ) and (WK).

RESPONSE NO. 7: Chrysler Group will provide, in image (.pdf) format, a copy of Technical Service Bulletins, if any, related to the fuel system of the 1996 Jeep Grand Cherokee (ZJ). Chrysler Group will also provide, in image (.pdf) format, a copy of the owner's manual and technical service manual for the 1996 Jeep Grand Cherokee (ZJ).

Chrysler Group otherwise objects to this request because it is overly broad and seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Chrysler Group specifically objects to this request because it is not limited to the model or model year vehicle at issue in this lawsuit. The Jeep Grand Cherokee (ZJ) was produced from the 1993 through the 1998 model year. The Jeep Grand Cherokee (WJ) is an all-new vehicle that was produced from the 1999 through the 2004 model year and is substantially different than the Jeep Grand Cherokee



(ZJ). The Jeep Grand Cherokee (WK) was first produced for the 2005 model year and is currently produced today. It is an all-new vehicle that is substantially different from the Jeep Grand Cherokee (ZJ) and the Jeep Grand Cherokee (WJ). Further, the Jeep Grand Cherokee (WK) was first produced nine years after the 1996 Jeep Grand Cherokee (ZJ) that is the subject of this lawsuit and seven years after the Jeep Grand Cherokee (ZJ) was discontinued from production. 

REQUEST NO. 8: Please produce copies of all technical service bulletins or correspondence or written instructions which Chrysler issued to its dealers or service personnel for the Jeep Grand Cherokee (ZJ), (WJ) and (WK) which relates in any way to the fuel tank, fuel tank assembly and fuel system design.

RESPONSE NO. 8: See Chrysler Group's response and objections to Request No. 7.

REQUEST NO. 9: All documents containing or reflecting any and all engineering studies or analysis of tests, whenever conducted and whether conducted by or on behalf of you, reflecting either the cost or the feasibility of any other alternative design or engineering approaches or alternative location of the fuel tank finally utilized in the 1996 Jeep Grand Cherokee. By "alternative design" or engineering approach, Plaintiff means any design or location or any method of construction different from the design, location and construction of the fuel system and fuel system parts actually incorporated into the 1996 Jeep Grand Cherokee. This request includes, but is not limited to, the following general types of documents:

- a. Blueprints, diagrams, or drawings, by whatever names called, pictorially representing the appearance and location of any such alternative engineering design.
- b. Engineering studies, by whatever name called, relating to or reflecting any such alternative engineering design.
- c. Studies or reports reflecting the cost or estimates of costs or “cost/benefit” analysis of any such alternative engineering design.
- d. Crash tests, finite analysis, and/or other tests of whatever kind or nature, including videos, relating to any such alternative testing.

RESPONSE NO. 9: The fuel system of the Jeep Grand Cherokee (ZJ) consisted of various components. The development of these components was a complex process involving the efforts of numerous individuals employed by Chrysler LLC and its suppliers and evolved over a period of time. A great many individual design decisions were made, then reviewed in light of other design decisions and for appropriateness of use. It is conceivable that design engineers discussed, reviewed, or otherwise considered other types of fuel systems. This is not a formal process and, in the ordinary course of business, there are no records kept of ideas or concepts that might have been considered by the engineers and later discarded.

Without waiving any objection, see Chrysler Group’s responses and objections to Request Nos. 2, 12, and 18.



REQUEST NO. 10: Please produce all testing on the development of the frame brace/blocker located near the fuel filler neck and all testing on the development of the rear fuel tank skid plate.

RESPONSE NO. 10: See Chrysler Group's response and objections to Request No. 1. Chrysler Group further notes that the fuel tank skid plate was available as optional equipment on 1993 through 1998 model year Jeep Grand Cherokee (ZJ) vehicles to protect the fuel tank surface from abrasion during low speed off-road excursions.

Chrysler Group otherwise objects to this request because it is overly broad and seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Chrysler Group specifically objects to this request because, as written, it is not limited to the model vehicle at issue in this lawsuit.

REQUEST NO. 11: Please disclose all known claims and lawsuits in which a person was injured in a rear impact collision resulting in a post-collision fuel fed fire of a Jeep Grand Cherokee (ZJ), (WJ) and (WK) and identify same by name, court docket number, date of incident and attorney for the Plaintiff.

RESPONSE NO. 11: Chrysler Group will search product liability records in its possession and will prepare and provide, pursuant to the entry of an appropriate protective order and in image (.pdf) format, a list of personal injury lawsuits served prior to February 24, 2007 in which it was alleged that a 1993 through 1998 Jeep Grand Cherokee (ZJ) was involved in a rear impact collision and a post-collision fuel fed fire occurred. The lawsuit list will reflect lawsuits filed in the United States and will contain

the title of the case, court, court location, docket number, date of event, and the name of the plaintiff's attorney.

Chrysler Group will also search product liability records in its possession and will prepare and provide, pursuant to the entry of an appropriate protective order and in image (.pdf) format, a list of personal injury claims received prior to February 24, 2007 in which it was alleged that a 1993 through 1998 Jeep Grand Cherokee (ZJ) was involved in a rear impact collision and a post-collision fuel fed fire occurred. The claims list will reflect claims arising from incidents occurring in the United States and will contain the name of the claimant, accident location, date of event, and name of claimant's attorney, if applicable.

See also Chrysler Group's response and objections to Request No. 14.

Chrysler Group does not agree that the incidents disclosed or the alleged mechanisms of failure are substantially similar to the incident at issue in this case or that the other vehicles are substantially similar to the accident vehicle for the purposes of this case.

Chrysler Group otherwise objects to this request because it is overly broad and seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Chrysler Group specifically objects to this request because it is not limited to the model vehicle at issue in this lawsuit. The Jeep Grand Cherokee (ZJ) was produced from the 1993 through the 1998 model year. The Jeep Grand Cherokee (WJ) is an all-new vehicle that was produced from the 1999 through the

2004 model year and is substantially different than the Jeep Grand Cherokee (ZJ). The Jeep Grand Cherokee (WK) was first produced for the 2005 model year and is currently produced today. It is an all-new vehicle that is substantially different from the Jeep Grand Cherokee (ZJ) and the Jeep Grand Cherokee (WJ). Further, the Jeep Grand Cherokee (WK) was first produced nine years after the 1996 Jeep Grand Cherokee (ZJ) that is the subject of this lawsuit and seven years after the Jeep Grand Cherokee (ZJ) was discontinued from production. Moreover, motor vehicle accidents differ greatly as to facts, including road or terrain geometry and conditions, vehicle configurations, and driver condition, behavior and control inputs. These various fact situations give rise to a corresponding variety of factual and legal issues, each of which is defined and limited by the facts of the specific case. Therefore, information about vehicles other than the accident vehicle and accidents other than that alleged in this case would neither provide nor lead to information as to the condition of the accident vehicle.

REQUEST NO. 12: Please provide all design change notices, engineering studies, litigation studies, internal memos, e-mails, testing, video tapes, prototype evaluations of the 1993 to 2004 (ZJ) (WJ) versions of the Jeep Grand Cherokee which had a rear mounted fuel tank, that discuss or describe in any way the revision to a mid vehicle mounted fuel tank beginning with the 2005 (WK) version of the Jeep Grand Cherokee.

RESPONSE NO. 12: After reasonable search and inquiry, Chrysler Group has not identified documents as referenced in this request that discuss placement of the fuel tank



in the Jeep Grand Cherokee (ZJ) in any location other than the one that was ultimately used.

Chrysler Group otherwise objects to this request because it is overly broad and seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Chrysler Group specifically objects to this request because it is not limited to the model vehicle at issue in this lawsuit. The Jeep Grand Cherokee (ZJ) was produced from the 1993 through the 1998 model year. The Jeep Grand Cherokee (WJ) is an all-new vehicle that was produced from the 1999 through the 2004 model year and is substantially different than the Jeep Grand Cherokee (ZJ). The Jeep Grand Cherokee (WK) was first produced for the 2005 model year and is currently produced today. It is an all-new vehicle that is substantially different from the Jeep Grand Cherokee (ZJ) and the Jeep Grand Cherokee (WJ). Further, the Jeep Grand Cherokee (WK) was first produced nine years after the 1996 Jeep Grand Cherokee (ZJ) that is the subject of this lawsuit and seven years after the Jeep Grand Cherokee (ZJ) was discontinued from production.

REQUEST NO. 13: Previously disclosed discovery to other attorneys regarding Jeep Grand Cherokee (ZJ), (WJ) and (WK) post collision fuel fed fires.

RESPONSE NO. 13: Chrysler Group objects to this request because it is unduly burdensome. Chrysler Group does not maintain sets of documents produced in other cases. To recreate productions from other cases would be exceedingly onerous. Chrysler Group has agreed to provide a large and broad range of documents in response to

Plaintiff's Notice to Produce Documents, Records, and Information Pursuant To Rule 4:18-1. Given the scope of the discovery in this case, it is not likely that recreating productions from other cases would provide any new or additional information relevant to this case or reasonably calculated to lead to the discovery of admissible evidence.

Further, in response to Request No. 11, Chrysler Group has agreed to provide the name of the plaintiff's attorney for lawsuits identified by Chrysler Group in which it was alleged that a 1993 through 1998 Jeep Grand Cherokee (ZJ) was involved in a rear impact collision and a post-collision fuel fed fire occurred. Plaintiff is able to contact the plaintiff's attorneys for the information sought in this request.

Chrysler Group further objects to this request because it is overly broad and seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Chrysler Group specifically objects to this request because it is not limited to the model vehicle at issue in this lawsuit. The Jeep Grand Cherokee (ZJ) was produced from the 1993 through the 1998 model year. The Jeep Grand Cherokee (WJ) is an all-new vehicle that was produced from the 1999 through the 2004 model year and is substantially different than the Jeep Grand Cherokee (ZJ). The Jeep Grand Cherokee (WK) was first produced for the 2005 model year and is currently produced today. It is an all-new vehicle that is substantially different from the Jeep Grand Cherokee (ZJ) and the Jeep Grand Cherokee (WJ). Further, the Jeep Grand Cherokee (WK) was first produced nine years after the 1996 Jeep Grand Cherokee (ZJ) that is the subject of this

lawsuit and seven years after the Jeep Grand Cherokee (ZJ) was discontinued from production.

REQUEST NO. 14: Please produce all CAIRS (Customer Assistance Inquiry Records) regarding the Jeep Grand Cherokee (ZJ), (WJ) rear impact post collision fuel fed fires.

RESPONSE NO. 14: The Customer Assistance Center of Chrysler LLC's Customer Relations Department received reports related to accidents involving Jeep Grand Cherokee (ZJ) vehicles. Records of these reports are maintained in Chrysler LLC's Customer Assistance System as Customer Assistance Inquiry Records (CAIRs). Chrysler Group will search Chrysler LLC's CAIRs generated prior to February 24, 2007 for those where an individual reported an accident involving a rear impact collision and a post-collision fuel fed fire involving a 1993 through 1998 Jeep Grand Cherokee (ZJ).


CAIRs are stored and coded and categorized based on the customer's stated reason for contacting the company, as understood by the individual receiving the contact, and may not necessarily reflect the company's findings or conclusions about the subject matter being reported. Moreover, the information contained in the Customer Assistance System may not be retrievable using the search criteria sought in this request. Consequently, there may be CAIRs that cannot be readily identified and produced without individuals reviewing millions of records. Chrysler Group will, however, make a reasonable and diligent search and provide, pursuant to the entry of an appropriate protective order and in text searchable (.csv) format, those CAIR narratives where an individual reported a

rear impact collision and post-collision fire involving a 1993 through 1998 Jeep Grand Cherokee (ZJ).

Chrysler Group does not agree that the incidents disclosed or the alleged mechanisms of failure are substantially similar to the incident at issue in this case or that the other vehicles are substantially similar to the accident vehicle for the purposes of this case.

Chrysler Group otherwise objects to this request because it is overly broad and seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Chrysler Group specifically objects to this request because it is not limited to the model vehicle at issue in this lawsuit. The Jeep Grand Cherokee (ZJ) was produced from the 1993 through the 1998 model year. The Jeep Grand Cherokee (WJ) is an all-new vehicle that was produced from the 1999 through the 2004 model year and is substantially different than the Jeep Grand Cherokee (ZJ). The Jeep Grand Cherokee (WK) was first produced for the 2005 model year and is currently produced today. It is an all-new vehicle that is substantially different from the Jeep Grand Cherokee (ZJ) and the Jeep Grand Cherokee (WJ). Further, the Jeep Grand Cherokee (WK) was first produced nine years after the 1996 Jeep Grand Cherokee (ZJ) that is the subject of this lawsuit and seven years after the Jeep Grand Cherokee (ZJ) was discontinued from production. Moreover, motor vehicle accidents differ greatly as to facts, including road or terrain geometry and conditions, vehicle configurations, and driver condition, behavior and control inputs. These various fact situations give rise to a

corresponding variety of factual and legal issues, each of which is defined and limited by the facts of the specific case. Therefore, information about vehicles other than the accident vehicle and accidents other than that alleged in this case would neither provide nor lead to information as to the condition of the accident vehicle.

REQUEST NO. 15: Names and current or last known addresses of Old Carco employees who were responsible for the design of the fuel system for the Jeep Grand Cherokee (ZJ) including location of the fuel tank and fuel filler neck, including but not limited to the following: Francois J. Castaing; Robert A. Lutz; D. Craig Winn; Owen J. Viergutz; Bernard I. Robertson and Robert H. Sinclair. 

RESPONSE NO. 15: The design, development, and assembly of the Jeep Grand Cherokee (ZJ), including its fuel system, was an incremental and evolutionary process, which involved the contribution of many different departments and engineers. Many proposals, ideas, and concepts were considered during the design process with input coming from numerous individuals employed by Chrysler LLC and its suppliers.

Chrysler Group cannot identify all persons responsible for the design of all of the components of the fuel system used in the Jeep Grand Cherokee (ZJ). However, former Chrysler LLC employee, Robert Banta, is an individual knowledgeable concerning the design and assembly of the rear components of the fuel system used in the Jeep Grand Cherokee (ZJ). Mr. Banta may be contacted by a properly served subpoena on Chrysler Group, as custodian of records of the former Chrysler LLC.

Chrysler Group otherwise objects to this request because it is overly broad, unduly burdensome, and seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Chrysler Group further objects to this request as argumentative to the extent it implies that Francois Castaing, Robert A. Lutz, D. Craig Winn, Owen J. Viergutz, Bernard I. Robertson, or Robert H. Sinclair were involved in the design of the fuel system of the Jeep Grand Cherokee (ZJ), which Chrysler Group denies.

REQUEST NO. 16: Please produce all safety papers written by former Chrysler engineer Roy Haeusler, including any writings referencing safety and fuel systems.

RESPONSE NO. 16: Chrysler Group will provide, in image (.pdf) format, a copy of articles or papers, in its possession, written by Roy Haeusler.

Chrysler Group otherwise objects to this request because it is overly broad and seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Chrysler Group specifically objects to this request because it is not limited to the model vehicle at issue in this lawsuit or to a relevant time frame.


REQUEST NO. 17: Please produce the Jeep Grand Cherokee product plans, sometimes called “Product Plan Book – Change Transmittal” for years 1993 through 2007.

RESPONSE NO. 17: Chrysler Group will provide, if available and subject to the entry of an appropriate protective order and in image (.pdf) format, portions of the



“Product Plan Book” for the 1993 through 1998 model year Jeep Grand Cherokee (ZJ) vehicle, which relate to the fuel systems.

Chrysler Group otherwise objects to this request as overly broad and seeking documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. In addition, it is not limited to the model, model year, time frame, or components reasonably at issue in this lawsuit.

REQUEST NO. 18: Please produce all Product Planning Committee (PPC) documents or presentations, videos or other, which relate in any way to the revision of the Jeep Grand Cherokee fuel system design from the 2004 (ZJ)/(WJ) to the 2005 Jeep Grand Cherokee (WJ), more specifically changing the fuel tank location from behind the axle to mid mounted position. 

RESPONSE NO. 18: After reasonable search and inquiry, Chrysler Group has not identified documents as referenced in this request that discuss placement of the fuel tank in the Jeep Grand Cherokee (ZJ) in any location other than the one that was ultimately used.

Chrysler Group otherwise objects to this request because it is overly broad and seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Chrysler Group specifically objects to this request because it is not limited to the model vehicle at issue in this lawsuit. The Jeep Grand Cherokee (ZJ) was produced from the 1993 through the 1998 model year. The Jeep Grand Cherokee (WJ) is an all-new vehicle that was produced from the 1999 through the

2004 model year and is substantially different than the Jeep Grand Cherokee (ZJ). The Jeep Grand Cherokee (WK) was first produced for the 2005 model year and is currently produced today. It is an all-new vehicle that is substantially different from the Jeep Grand Cherokee (ZJ) and the Jeep Grand Cherokee (WJ). Further, the Jeep Grand Cherokee (WK) was first produced nine years after the 1996 Jeep Grand Cherokee (ZJ) that is the subject of this lawsuit and seven years after the Jeep Grand Cherokee (ZJ) was discontinued from production.

Dated: May 7, 2010

As to objections only,

Attorneys for
CHRYSLER GROUP LLC,

By M. Sheila Jeffrey
M. Sheila Jeffrey

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