Q Based on your review of paragraph 1 and the knowledge you have with reference to the asbestos litigation Chrysler is involved in, who would be the person most responsive to that request?

A I don't know. Probably the person you are going to depose named Mr. Kelly.

Q What I would like you to do is review paragraph 2 with the same question in mind.

A All right.

Q To your knowledge who would be the person most responsive to that request?

A Either me or Bob Maples.

Q I don't know if I asked this already, when did Bob Maples start with Chrysler?

A Probably 1983 or 1984 or 1985.

Q Review paragraph 3.

A All right.

Q Who would be most responsive to that request?

A I don't know.

Q Turn to page 4 and look at the documents requested. I would like you to review paragraph 1.

A All right.

Q Have you reviewed it?

A Yes.