EXHIBIT
CHR-80b

STATE OF MICHIGAN

IN THE CIRCUIT COURT FOR THE COUNTY OF WAYNE

CHARLIE SLY / NO. 84-428741 NP
Hon. James E. Mies

IRVING CASEY and MATTIE JEAN CASEY / NO. 84-428754 NP
Hon. James E. Mies

SAMUEL HAMILTON and BERTHA HAMILTON / NO. 84-428756 NP
Hon. James E. Mies

Plaintiffs,

-vs-

CHRYSLER MOTORS CORPORATION

Defendant. /

Filed MAR 02 1987

COPY

Russell W. Budd (P37765)
Attorney for Plaintiffs

Tova Shaban (P38392)
Attorney for Defendant /

CHRYSLER'S RESPONSE TO PLAINTIFFS' REQUESTS FOR ADMISSION DATED DECEMBER 31, 1986

NOW COMES Defendant, CHRYSLER MOTORS CORPORATION, by and through its attorneys, FEIKENS, FOSTER, VANDER MALE & DE NARDIS, P.C., and in response to Plaintiffs' Requests for Admission submits the following answers:

a) Admit

i) Admit

ii) Admit

b) Admit

c) Admit

d) Admit

e) Admit

f) Admit

g) Admit

h) Admit

STATE OF MICHIGAN

IN THE CIRCUIT COURT FOR THE COUNTY OF Wayne

CHARLIE SLY,
IRVING CASEY and MATTIE JEAN CASEY,
SAMUEL HAMILTON and BERTHA HAMILTON

Plaintiff,s

-vs-

No. 84-428741 NP
84-428754 NP
84-428756 NP
Hon. James E. Mies

Defendant.

CHRYSLER MOTORS CORPORATION

PROOF OF SERVICE

STATE OF MICHIGAN )
) SS
COUNTY OF WAYNE )

DONNA M. WAYNO , being duly sworn,

deposes and says that on February . 1987 , she served

a true copy of CHRYSLER'S RESPONSE TO PLAINTIFFS' REQUESTS FOR ADMISSIONS Dated December 31, 1986.

upon the following:

RUSSELL W. BUDD, ESQ.
8333 Douglas Ave.
Dallas, Texas

ALL COUNSEL OF RECORD

by enclosing same in an envelope and placing the same in the United States mail, postage prepaid.

Subscribed and sworn to before me
this 2nd day of March , 1987

ii) Admit

iii) Admit

iv) Admit

v) Admit

i) Admit

i) This party has made reasonable inquiry and is unable to admit or deny this request because there is no individual who possesses this knowledge and/or information and because there are no records or documents in this party's possession or custody which would enable it to admit or deny the request.

ii) Admit

iii) Admit

iv) Admit

v) Admit

j) Admit

i) This party has made reasonable inquiry and is unable to admit or this request because there is no individual who possesses this knowledge and/or information and because there are no records or documents in this party's possession or custody which would enable it to admit or deny the request.

ii) Admit

iii) Admit

iv) Admit

v) Admit

k) Admit

i) Admit

l) Admit

i) Admit

m) Admit

i) Admit

n) Admit

i) Admit

o) Admit

i) This party has made reasonable inquiry and is unable to admit or deny this request because there is no individual who possesses this knowledge and/or information and because there are no records or documents in this party's possession or custody which

ii) Admit

iii) Admit

iv) Admit

v) Admit

p) Admit

i) This party has made reasonable inquiry and is unable to admit or deny this request because there is no individual who possesses this knowledge and/or information and because there are no records or documents in this party's possession or custody which would enable it to admit or deny the request.

ii) Admit

iii) Admit

iv) Admit

v) Admit

q) Admit

i) Admit

r) Admit

s) Admit

i) This party has made reasonable inquiry and is unable to admit or deny this request because there is no individual who possesses this knowledge and/or information and because there are no records or documents in this party's possession or custody which would enable it to admit or deny the request.

ii) Admit

t) Admit

i) This party has made reasonable inquiry and is unable to admit or deny this request because there is no individual who possesses this knowledge and/or information and because there are no records or documents in this party's possession or custody which would enable it to admit or deny the request.

ii) Admit

iii) Admit

iv) Admit

v) Admit

u) Admit

v) Admit

w) Admit

iii) Admit

iv) Admit

v) Admit

x) Admit

i) This party has made reasonable inquiry and is unable to admit or deny this request because there is no individual who possesses this knowledge and/or information and because there are no records or documents in this party's possession or custody which would enable it to admit or deny the request.

ii) Admit

iii) Deny. Chrysler admits the volume has the stamp "Feb. 2, 1960".

iv) Admit

v) Admit

y) Admit

z) Admit

aa) Admit

i) This party has made reasonable inquiry and is unable to admit or deny this request because there is no individual who possesses this knowledge and/or information and because there are no records or documents in this party's possession or custody which would enable it to admit or deny the request.

ii) Admit

iii) Admit

iv) Admit

v) Admit

bb) Admit

i) This party has made reasonable inquiry and is unable to admit or deny this request because there is no individual who possesses this knowledge and/or information and because there are no records or documents in this party's possession or custody which would enable it to admit or deny the request.

ii) Admit

cc) Admit

i) This party has made reasonable inquiry and is unable to admit or deny this request because there is no individual who possesses this knowledge and/or information and because there are no records or documents in this party's possession or custody which would

ii) This party has made reasonable inquiry and is unable to admit or deny this request because there is no individual who possesses this knowledge and/or information and because there are no records or documents in this party's possession or custody which would enable it to admit or deny the request.

iii) Chrysler states that one of these journals has the stamp "June 11, 1935".

iv) Admit

dd) Admit

i) This party has made reasonable inquiry and is unable to admit or deny this request because there is no individual who possesses this knowledge and/or information and because there are no records or documents in this party's possession or custody which would enable it to admit or deny the request.

ii) This party has made reasonable inquiry and is unable to admit or deny this request because there is no individual who possesses this knowledge and/or information and because there are no records or documents in this party's possession or custody which would enable it to admit or deny the request.

iii) Chrysler admits that one of these journals has the stamp "April 22, 1958".

iv) Admit

ee) Admit

i) This party has made reasonable inquiry and is unable to admit or deny this request because there is no individual who possesses this knowledge and/or information and because there are no records or documents in this party's possession or custody which would enable it to admit or deny the request.

ii) This party has made reasonable inquiry and is unable to admit or deny this request because there is no individual who possesses this knowledge and/or information and because there are no records or documents in this party's possession or custody which would enable it to admit or deny the request.

iii) Chrysler admits that one of these journals has the stamp "October 23, 1950".

iv) Admit. Chrysler further states that the last journal in its possession is dated December, 1954.

ff) Admit

i) See h) i)

ii) Admit

gg) Admit

i) See h) i)

ii) Admit

hh) Admit

ii) Admit

iii) Admit

jj) Admit

i) See h) i)

ii) Admit

iii) Admit

kk) Admit

ll) Admit

i) See h) i)

ii) Admit

mm) Admit

i) See h) i)

ii) Admit

nn) Admit

i) See h) i)

ii) Admit

oo) Admit

i) See h) i)

ii) Admit

pp) Admit

qq) Admit

rr) Admit

ss) Admit

tt) Admit

i) See h) i)

ii) Admit

uu) Admit

i) Chrysler admits it has volumes of this journal dating from January 1979. to April. 1982.

vv) Admit

i) Chrysler admits it has volumes of this journal from 1978 to the present.

xx) Admit

i) See h) i)

ii) Admit

iii) Admit

yy) Admit

i) Chrysler admits it has volumes of this journal from 1973 to the present.

zz) After conducting a diligent search, Chrysler neither admits nor denies this request because it doesnt have any documents to verify this information.

aaa) After conducting a diligent search, Chrysler neither admits nor denies this request because it doesn't have any documents to verify this information.

bbb) Admit

Respectfully submitted.

CHRYSLER MOTORS CORPORATION

BY: _____

JACK L. KOBLIN
Senior Staff Counsel
Insurance and Litigation Dept.

DATED: February 24, 1987

AFFIDAVIT

STATE OF MICHIGAN)
)ss
COUNTY OF WAYNE )

JACK L. KOBLIN, being duly sworn, avers and says that he is the Senior Staff Counsel of the Insurance and Litigation Department at Chrysler Motors Corporation; that he is an authorized agent for the purpose of executing this document on behalf of Defendant, Chrysler Motors Corporation; that the answers were prepared by Mr. Koblin based upon a diligent search of Chrysler's libraries, and upon his previous knowledge and upon information communicated to him over the years; and that Chrysler Motors Corporation believes such statements are true and correct.

JACK L. KOBLIN
Senior Staff Counsel
Insurance and Litigation Dept.
Chrysler Motors Corporation

Subscribed and sworn to before me
this [illegible] day of February, 1987.

Notary Public

GERALDINE J. [illegible]
Notary Public, [illegible] County, Michigan
Acting in Wayne
My Commission Expires [illegible], 1989