



BUMGARDNER, HARDIN & ELLIS

A PROFESSIONAL CORPORATION

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ATTORNEYS FOR Defendant, Chrysler Motors Corporation

MARSHALL D. COATES and SHARON E. COATES, his wife,	:	SUPERIOR COURT OF NEW JERSEY LAW DIVISION: MIDDLESEX COUNTY
Plaintiffs,	:	
vs.	:	DOCKET NO: L-095651-85
MATTY'S AUTO PARTS, et al.,	:	Civil Action
vs.	:	
CUSTOM CLUTCH SERVICES, et al.,	:	MORE SPECIFIC RESPONSES TO PLAINTIFF'S JUNE 20, 1988
vs.	:	DOCUMENT PRODUCTION REQUEST
DAIDO OVERSEAS, INC., et als.,	:	
Defendants.	:	

Defendant, Chrysler Motors Corporation, by way of response to plaintiffs, more specific discovery requests says:

2. Objection. Plaintiffs were not employees of Chrysler Motors Corporation. However, notwithstanding the subjection, please be advised that the answer to this request is none.

3. See attached Corporate directory. Chrysler Motors Corporation produces this Corporate directory with the understanding that plaintiff's counsel will not release names of any department heads or employees listed in directory nor will plaintiff or plaintiff's counsel contact any such individuals without first having contacted counsel for Chrysler.

5. Chrysler Motors Corporation objects to this request as being overly broad and burdensome. Additionally, Chrysler Motors Corporation objects to this request in that it asks for information concerning manufacturing plants at which plaintiffs did not work. It must be emphasized that plaintiff's were garage mechanics. Notwithstanding this objection and for purposes of discovery only and without waiving these objections surveys were conducted every six months, beginning in 1971, with regard to monitoring dust levels at Chrysler's Manufacturing facility.

6. After a diligent search Chrysler has been unable to locate any record or copies of minutes or reports written by or concerning the Chrysler executive committee.

11. Attached is Chrysler Motors Corporation's current dealer directory. The dealer directory is updated quarterly and old copies are discarded.

13. Attached is a copy of Chrysler Motors Corporation's current New Jersey district managers. This is being provided with the proviso that plaintiff's counsel and plaintiff will not contact the district managers for the New Jersey area without first contacting counsel for Chrysler. There are no copies of old district manager listings in existence.

BUMGARDNER, HARDIN & ELLIS, P.A.
Attorneys for Defendant,
Chrysler Motors Corporation

By:


NICEA J. D'ANNUNZIO

Chrysler Motors Corporation More Specific Answers
to Plaintiff's Document Request from December, 1987

1. Chrysler Motors Corporation has made a diligent search of its records and can find no other documents relating to warnings which are not attorney/client privilege. However, plaintiff has not complied with provision 10 of the Special Masters order of October 20, 1988 concerning documentation plaintiff has on the issue of warnings. When plaintiff provides such documentation, Chrysler will again review its records to see whether or not any further documentation can be found. However, at this time there is none.

39. None. Affidavit to follow.

40. None. Affidavit to follow.

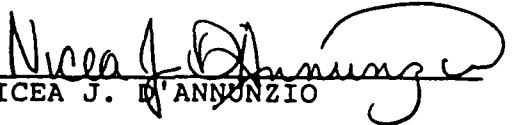
43. None.

44. Objection There is a distinct difference between an employee who must abide by company policy and a local service station or job mechanic over whom Chrysler has no immediate control. Subject to this objection that there is no relevance between a job mechanic and an employee at a Chrysler manufacturing plant, and for the purposes of discovery only beginning in 1971 surveys were conducted every six months with

regard to monitoring dust levels in the Chrysler manufacturing facility. In 1965, use of respirators commenced.

45. None.

BUMGARDNER, HARDIN & ELLIS
Attorneys for Defendant,
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By: 
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