

# DETROIT REVOLUTIONARY MOVEMENT RECORDS

BOX 3 OF 16

FOLDER 21

EWSC MI CIVIL RIGHTS  
COMMISSION NOTICES APR  
1971

STATE OF MICHIGAN  
Civil Rights Commission

10330-EM -  
10332-EM  
10388-EM  
10390-EM  
No. \_\_\_\_\_

NOTICE \*

IN THE NAME OF THE PEOPLE OF THE STATE OF MICHIGAN:

TO Mr. Carl Polsgrove, Labor Relations Supervisor  
Chrysler Eldon Avenue Gear & Axle Plant - Detroit, Michigan 48234

You are hereby notified to appear before the Civil Rights Commission, at the Labor  
Relations Department in the City of Detroit,  
County of Wayne, State of Michigan, on 29th day of April, A.D. 1971,  
at 10:00 o'clock in the Fore noon, then and there to give evidence in a certain  
matter pending before said Commission wherein Robert McKee James Edwards  
Alonzo Chandler John Taylor (are) Claimant(s)  
and Chrysler Corporation - Eldon Avenue Axle Plant (is) Respondent(s)

You are further notified to bring and have with you and then and there produce the following:

(SEE ATTACHED SHEET)

A TRUE COPY  
MICHIGAN CIVIL RIGHTS COMMISSION

Given under the hand and seal of said Commission  
this 16th day of April, A.D. 1971

MICHIGAN CIVIL RIGHTS COMMISSION

By: Milton J. Robinson, Executive Director

STATE OF MICHIGAN

County of \_\_\_\_\_ } ss.

\_\_\_\_\_, a competent person, being sworn, says that on  
\_\_\_\_\_, 19\_\_\_\_ in said County, he served the within Notice personally upon  
\_\_\_\_\_ the witness named therein, by then and there showing to  
said above-named witness the original of said Notice with the seal impressed thereon, and delivering to  
said witness a true copy of said Notice and paying to said witness the legal fee therewith.

Subscribed and sworn to before me this \_\_\_\_\_  
day of \_\_\_\_\_, 196\_\_\_\_\_

Notary Public in and for \_\_\_\_\_  
County, Michigan

My Commission expires \_\_\_\_\_

This Order Issued Upon Request of

- Claimant
- Respondent
- Hearing Referee
- Commission

\* Issued pursuant to Article V, Sec. 29, of the Michigan Constitution, Act 45 of the Second Extra Session of 1963, and the Rules of the Michigan Civil Rights Commission.

# A TRUE COPY

MICHIGAN CIVIL RIGHTS COMMISSION

## M E M O R A N D U M

BY \_\_\_\_\_

Michigan Civil Rights Commission  
900 Cadillac Square Building  
Detroit, Michigan 48226

RE: 10330-EM - Robert McKee  
10332-EM - Alonzo Chandler  
10388-EM - James Edwards  
10390-EM - John Taylor

-vs-

Chrysler Corporation - Eldon Avenue  
Axle Plant

### INFORMATION

1. The initial job assignment, date of hire, pay rate and job classification assignment of all hourly employees hired at the Eldon facility since January, 1967 to the present, indicating the race of each employee.
2. Copies of the following reports written at the Eldon facility since January, 1967 to the present, indicating the race of each employee:
  - A. Death or Serious Injury reports
  - B. Injury notice
  - C. Medico-Legal Report (write up)
  - D. Monthly Activity Report
  - E. Lost Time Report
  - F. Notice of Occupational Disability
  - G. Employee's Basic Report of Injury - Form 100
  - H. Supervisor's Report of Injury
3. Copies of all (BLS-Z-16) reports filed by the Eldon facility since January, 1967 to the present;
4. Name, race, job classification and plant seniority of each employee who has applied for a skilled trades position at Eldon since January, 1967 to the present, indicating the disposition of each application;
5. Current seniority lists for all departments at Eldon, indicating race of each individual;
6. Copies of all requests for intradepartmental, interdepartmental and plant transfers made at the Eldon Plant since January, 1967 to the present, indicating the race of each employee and the disposition of each request;
7. Copies of all preventive maintenance orders, machine repair orders and moving stock repairs at the Eldon plant since January, 1967 to the present;
8. The race, date of hire and job classification of each employee (hourly) who has been transferred to or from Eldon since January, 1967 to the present; and
9. Copies of EEO-1 forms from January, 1967 to the present for Eldon facility.
10. Copies of appraisals on foreman candidates approved and rejected at Eldon Avenue; for each department from December, 1969, to present indicating department, name, race, job classification and disposition of request.

RECEIVED  
APR 27 1971

MICHIGAN CIVIL RIGHTS COMMISSION

C. R. C.

ROBERT McKEE,

Claimant,

vs

No. 10,330-EM

CHRYSLER CORPORATION,

Respondent.

ALONZO CHANDLER,

Claimant,

vs

No. 10,332 EM

CHRYSLER CORPORATION,

Respondent.

JAMES EDWARDS,

Claimant,

vs

No. 10,388-EM

CHRYSLER CORPORATION,

Respondent

JOHN TAYLOR,

Claimant,

vs

No. 10,390-EM

CHRYSLER CORPORATION,

Respondent

MOTION FOR TEMPORARY STAY OF NOTICE TO PRODUCE DOCUMENTS

Respondent, Chrysler Corporation, hereby moves the Michigan Civil Rights Commission, or its Executive Director, Milton J. Robinson, to enter an order temporarily staying the "Notice to Bring Documents" issued in the above matter under date

DICKINSON, WRIGHT, MCKEAN & CUDLIP



of April 16, 1971 by Milton J. Robinson, Executive Director of the Michigan Civil Rights Commission.

In support of this motion Respondent respectfully shows unto this Commission:

1. As of this same date, Respondent, Chrysler Corporation, has filed with this Commission its Motion entitled, "Motion for Dismissal of Complaints Nos. 10,330-EM; 10,332-EM; 10,388-EM and 10,390-EM and For Revocation of Notice to Bring Documents."

2. By such Motion, Respondent requests that this Commission dismiss the complaints in these matters and revoke the Notice to Bring Documents.

3. By its terms, the Notice to Bring Documents directs personnel of Chrysler Corporation to bring before the Michigan Civil Rights Commission certain documents, at 10:00 in the forenoon on the 29th day of April, 1971.

4. Unless the Commission stays its April 16, 1971 Notice to Bring Documents pending the Commission's resolution of Respondent's "Motion for Dismissal of Complaints Nos. 10,330-EM; 10,332-EM; 10,388-EM and 10,390-EM and For Revocation of Notice to Bring Documents", Respondent will be in jeopardy of a finding that it is in default of the Commission's Notice to Bring Documents.

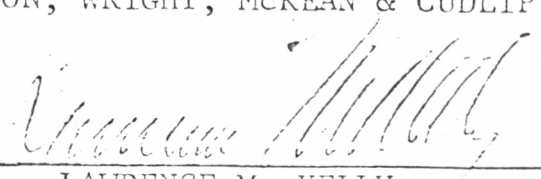
WHEREFORE, Respondent respectfully requests that the

Commission, or its Executive Director Milton J. Robinson, on or before 5:00 p.m. Wednesday, April 28, 1971, enter an order temporarily staying the Notice to Bring Documents dated April 16, 1971 pending the Commission's resolution of Respondent's "Motion for Dismissal of Complaints Nos. 10,330-EM; 10,332-EM; 10,388-EM and 10,390-EM and For Revocation of Notice to Bring Documents" and that on or before 5:00 p.m. April 28, 1971, the Commission by telephone notify counsel for Respondent of the entry of, or refusal to enter, such temporary stay of Notice to Bring Documents.

Respectfully submitted,

DICKINSON, WRIGHT, McKEAN & CUDLIP

By



LAWRENCE M. KELLY

Attorneys for Chrysler Corporation  
800 First National Building  
Detroit, Michigan 48226  
962-5860

OF COUNSEL:

A. William Rolf  
Ralph Paul Fichtner  
Chrysler Corporation  
P. O. Box 1919  
Detroit, Michigan 48231

Dated: April 27, 1971

MICHIGAN CIVIL RIGHTS COMMISSION

ROBERT McKEE,

Claimant,

vs

No. 10,330-EM

CHRYSLER CORPORATION,

Respondent.

---

ALONZO CHANDLER,

Claimant,

vs

No. 10,332-EM

CHRYSLER CORPORATION,

Respondent.

---

JAMES EDWARDS,

Claimant,

vs

No. 10,388-EM

CHRYSLER CORPORATION,

Respondent.

---

JOHN TAYLOR,

Claimant,

vs

No. 10,390-EM

CHRYSLER CORPORATION,

Respondent.

---

MOTION  
FOR DISMISSAL OF COMPLAINTS NOS. 10,330-EM; 10,332-EM  
10,388-EM and 10,390-EM  
AND  
FOR REVOCATION OF NOTICE TO BRING DOCUMENTS

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Respondent, Chrysler Corporation, hereby moves the Civil Rights Commission to enter its order (1) revoking the "Notice to Bring Documents" issued in the above matters under date of April

16, 1971 by Milton J. Robinson, Executive Director of the Michigan Civil Rights Commission, and (2) dismissing the complaints in the above matters.

In support of this motion Respondent respectfully shows unto this Commission:

1. The Commission has no jurisdiction in this matter because the complaints (Numbers 10,330-EM; 10,332-EM; 10,388-EM; and 10,390-EM) were not filed within the jurisdictional time limits specified by the statute which regulates the complaint procedure of the Commission, Act 45 of the Second Extra Session of 1963. Such Act, through reference to and incorporation of certain provisions of Act 251 of the Public Acts of 1955, requires (in Section 7(b)) that a Complaint must be filed "within 90 days after the alleged act of discrimination". The above referenced Complaints all specifically and expressly state that the "Date of Alleged Violation" complained of is "May 26, 1970". The above referenced Complaints were each filed on October 17, 1970. Each of the Complaints was thus filed well after the express statutory time bar for filing.

2. The Complaints, after expressly and specifically stating that the "Alleged Violation" of civil rights was an "Unfair Discharge", and after further specifying that the "employees were discharged for having participated in the protest against unfair conditions" which protest took place on the specified date

of "May 25, 1970", proceed to the gratuitous making of wholesale allegations which patently on their face are totally unrelated and totally irrelevant to the discharge which is the express "Alleged Violation" specified by the Complainants, and which wholesale allegations further are totally lacking in the statement of "particulars" required by Section 7(b) of the statute governing complaints, cited in paragraph 1 above. To-wit, the Complaints, in such further patently irrelevant and wholesale allegations, state:

"Black workers have been subjected to discriminatory treatment in the areas of: Hiring and promotional opportunity for hourly, salaried and management positions; disciplinary action; job assignments concentrating blacks in particular plants, divisions and departments, and exposure to working conditions that are dangerous and hazardous to health."

3. The referenced Notice should be revoked by the Commission pursuant to law and pursuant to the provisions of Section 73 of the Administrative Procedures Act of 1969 (P.A. No. 306 of the Public Acts of 1969) because the Notice is directed toward the obtaining of information which would be relevant only to the Complaints as to which the Commission has no jurisdiction because of untimely filing.

4. Even if the Complaints had been timely filed, the Notice should be revoked by the Commission pursuant to law and pursuant to the provisions of Section 73 of the Administrative

Procedures Act of 1969 (P.A. No. 306 of the Public Acts of 1969) because the Notice is directed to the patently irrelevant allegations in such untimely Complaints.

5. Further, the Notice is unreasonably oppressive in that it demands that Respondent search for, procure, copy and provide information which covers a period of well over four calendar years and which pertains to thousands of employees and applicants for employment of Respondent. In addition to the patently unreasonable time period and scope of employees and applicants for employment covered by the information demand in the Notice, the Notice demands information as to categories of fact which are totally irrelevant to the claimed alleged violation, the irrelevance pertaining both to the specific nature of the alleged violation and to the time period specified in the Complaints.

6. The Notice, in its demand for information as to persons and time periods totally unrelated to the relevant allegations in the Complaints would unfairly and unreasonably place upon Respondent a burden of searching for, procuring, copying and producing a great mass of irrelevant data, requiring many hundreds of straight time and overtime hours of clerical help, at a cost of many thousands of dollars in wages for such clerical help.

WHEREFORE, Respondent requests of this Commission that:

(1) The Commission dismiss the Complaints in these matters as statutorily barred by lapse of time, and

(2) The Commission revoke the Notice for the reasons, jointly and in the alternative:

(a) That the Commission has no jurisdiction over the time-barred complaints;

(b) That the Notice is directed toward information which is patently irrelevant to the expressly and specifically stated "Alleged Violation" in the Complaints, and

(c) That the Notice is unfairly and unreasonably oppressive in that it demands that Respondent search for, procure, copy and provide information which is not only patently irrelevant to the complained of "Alleged Violation" but which demanded information also covers a period of well over four calendar years and which pertains to thousands of employees and applicants for employment of Respondent, and which Notice in its demand for information as to persons and time periods totally unrelated to the relevant specified allegations in the Complaint, would place upon Respondent an unfair and unreasonable burden of searching for, procuring, copying and producing a great mass of irrelevant data requiring many hundreds of straight time and overtime hours of clerical help, at a cost of many thousands of dollars of wages for such clerical help.

(3) That the Commission set this motion for oral argument at the Commission's earliest convenience, before the Commission sitting en banc, and that Respondent be notified of such date

and be allotted 15 minutes of oral argument in support of such motion.

Respectfully submitted,

DICKINSON, WRIGHT, McKEAN & CUDLIP

By 

LAWRENCE M. KELLY

Attorneys for Chrysler Corporation  
800 First National Building  
Detroit, Michigan 48226  
962-5860

OF COUNSEL:

A. William Rolf  
Ralph Paul Fichtner  
Chrysler Corporation  
P. O. Box 1919  
Detroit, Michigan 48231

Dated: April 27, 1971

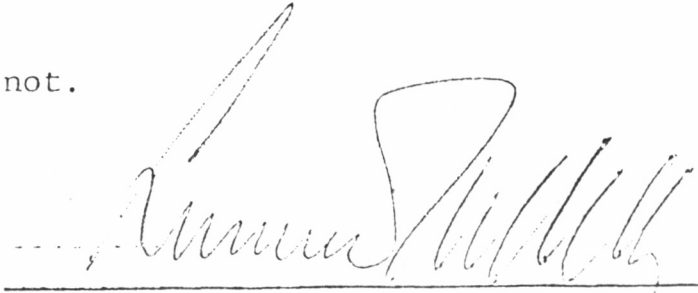




1. That he is one of the attorneys for Chrysler Corporation, Respondent in the above-entitled causes.


2. That the matters set forth in the Respondent's motion are, to the best of his information and belief, matters which he believes to be true.

Further deponent says not.



LAWRENCE M. KELLY

Subscribed and sworn to before me this 27th day of April, 1971.

  
Cheryl A. Thigpen  
Notary Public, Wayne County, Mich.  
My commission expires: 10/21/72

c. Made  
Lawrence

10330  
10332  
10388  
10390

STATE OF MICHIGAN

IN THE CIRCUIT COURT FOR THE COUNTY OF INGHAM

CHRYSLER CORPORATION, a  
Delaware corporation,

Plaintiff,

Civil Action

vs

No. 13068-C

MICHIGAN CIVIL RIGHTS  
COMMISSION,

Defendant.

ORDER TO SHOW CAUSE

At a session of said Court held in the  
City Hall in the City of Lansing, Ingham  
County, Michigan on this 10 day of April,  
1971

PRESENT: HONORABLE [Signature]  
Circuit Court Judge

Upon reading and filing of the Complaint of Chrysler  
Corporation in this matter and the Affidavit in support thereof,  
and the Court being fully advised in the premises,

NOW, THEREFORE, IT IS ORDERED:

1. That the Michigan Civil Rights Commission shall file  
with this Court an Answer to Plaintiff's Complaint herein together  
with all records and papers pertaining to the proceedings before  
the Michigan Civil Rights Commission, in Complaint matters 10,330-  
EM; 10,332-EM; 10,388-EM and 10,390-EM within 10 days of the  
service of a copy of this Order upon them.

2. That any and all proceedings before defendant Michigan Civil Rights Commission in complaint matters 10,330-EM; 10,332-EM; 10,388-EM and 10,390-EM be and hereby are stayed until further Order of this Court.

3. That the defendant appear before this Court on May 11 1971 at 2:10 o'clock in the noon in the <sup>Court House</sup> City Hall of the County of Ingham, in <sup>Lansing</sup> Lansing, Michigan to show cause before the Honorable Sam Street Hughes why a mandatory order of superintending control should not be entered directing defendant to stay its notice order of April 16, 1971 pending the Commission's hearing of and decision upon the Motion for Dismissal of Complaints Nos. 10,330-EM; 10,332-EM; 10,388-EM and 10,390-EM and For Revocation of Notice to Bring Documents filed by plaintiff Chrysler Corporation on April 27, 1971 and until further order of this Court.

4. That a copy of this Order and of Plaintiff's Complaint be served upon the Defendant on or before May 11, 1971.

5. No security is required since no damage will be incurred by Defendant by the entry of this Order.

SAM STREET HUGHES

Circuit Court Judge

A TRUE COPY  
C. ROSS HILLIARD  
INGHAM COUNTY CLERK

STATE OF MICHIGAN

IN THE CIRCUIT COURT FOR THE COUNTY OF INGHAM

CHRYSLER CORPORATION, a  
Delaware corporation,

Plaintiff,

Civil Action

vs

No. 13068-C

MICHIGAN CIVIL RIGHTS  
COMMISSION,

Defendant.

---

COMPLAINT

NOW COMES the plaintiff, Chrysler Corporation, a Delaware corporation, by its attorneys, Dickinson, Wright, McKean & Cudlip, and does complain against defendant pursuant to Rule 711, Michigan General Court Rules of 1963, as follows:

1. Chrysler Corporation is a corporation duly organized and existing by virtue of the laws of the State of Delaware and is doing business in the State of Michigan pursuant to the authority granted to it.

2. The Michigan Civil Rights Commission ("Commission") is a constitutionally created agency of the State of Michigan and maintains offices in various cities throughout the State of Michigan.

3. Jurisdiction of this court over the cause of action

stated herein is set forth in Article VI, Section 13 of the Michigan Constitution of 1963; Michigan Compiled Laws Sections 600.615 and 37.4; and G.C.R. 711.4.

4. On October 17, 1970, complaints numbers 10,330-EM; 10,332-EM; 10,388-EM and 10,390-EM were filed with the Michigan Civil Rights Commission by Michael Aldeman, an attorney, as agent for Robert McKee (#10,330-EM), Alonzo Chandler (#10,332-EM) and James Edwards (#10,388-EM), and by Harry John Taylor on his own behalf (#10,390-EM). Copies of these complaints are attached hereto as Exhibits "A", "B", "C" and "D" and by this reference made a part hereof.

5. Each of the complaints in the printed space entitled "Alleged Violation" stated that the alleged violation which was the subject of the complaint was "Unfair discharge".

Each of the complaints in the printed space entitled "Date of Alleged Violation" state that the date of the alleged violation complained of is "May 26, 1970".

Each of the complainants stated he had been "discharged for having participated in a protest against unsafe conditions" which the complaints state took place the day before the alleged discharge, i.e., "May 25, 1970".

6. P.A. 45 of the Second Extra Session of 1963, through

reference to and incorporation of certain provisions of Act 251 of the P.A. of 1955 requires (in Section 7(b)) that a complaint must be filed "within 90 days after the alleged act of discrimination". Each of the alleged complaints was filed on October 7, 1970, well after the express statutory time bar for filing.

7. Under date of April 16, 1971 the Michigan Civil Rights Commission issued its order, through Milton J. Robinson, Executive Director of the Commission, directing plaintiff, Chrysler Corporation to appear before the Michigan Civil Rights Commission at 10:00 a.m. on April 29, 1971 and to "then and there give evidence" in regard to the four referenced complaints and to further "bring and have with you and then and there produce the following. . ." The notice then makes reference to an attached memorandum specifying categories of "Information". The "Notice" order of the Commission and the attached memorandum are attached to this complaint and by this reference made a part of the complaint as Exhibit "E".

The Notice requests Chrysler Corporation to search for, procure, copy and produce "information" covering a period of well over four calendar years and applying to each of some several thousands of employees and applicants for employment at Chrysler Corporation.

The searching for, procuring, copying and producing would require the expenditure of hundreds of hours of clerical work and thousands of dollars of wages, and would disrupt the normal and necessary duties of the clerical staff at a time of heavy automobile production.

8. Over date of April 27, 1971 Plaintiff, Chrysler Corporation, filed with the Commission its motion entitled "Motion for Dismissal of Complaints Nos. 10,330-EM; 10,332-EM; 10,388-EM and 10,390-EM and For Revocation of Notice to Bring Documents". A copy of that motion is attached hereto and by this reference made a part hereof as Exhibit "F".

9. The motion requested of the Commission as follows:

"(1) The Commission dismiss the Complaints in these matters as statutorily barred by lapse of time, and

(2) The Commission revoke the Notice for the reasons, jointly and in the alternative:

(a) That the Commission has no jurisdiction over the time-barred complaints;

(b) That the Notice is directed toward information which is patently irrelevant to the expressly and specifically stated "Alleged Violation" in the Complaints, and

(c) That the Notice is unfairly and unreasonably oppressive in that it demands that Respondent search for, procure, copy and provide information which is not only patently irrelevant to the complained of "Alleged Violation" but which demanded information also covers a period of well over four calendar years and which pertains to thousands of employees and applicants for employment of Respondent, and which Notice in its demand for information as to persons and time periods totally unrelated to the relevant specified allegations in the Complaint, would place upon Respondent an unfair and unreasonable burden of searching for, procuring, copying and producing a great mass of irrelevant data requiring many hundreds of straight time and overtime hours of clerical help, at a cost of many thousands of dollars of wages for such clerical help.



(3) That the Commission set this motion for oral argument at the Commission's earliest convenience, before the Commission sitting en banc, and that Respondent be notified of such date and be allotted 15 minutes of oral argument in support of such motion."

10. On the same date and time of filing of the above motion Chrysler Corporation filed a second motion entitled "Motion for Temporary Stay of Notice to Produce Documents" by which motion plaintiff, Chrysler Corporation, requested that

"The Commission, or its Executive Director Milton J. Robinson, on or before 5:00 p.m. Wednesday, April 28, 1971, enter an order temporarily staying the Notice to Bring Documents dated April 16, 1971 pending the Commission's resolution of Respondent's "Motion for Dismissal of Complaints Nos. 10,330-EM; 10,332-EM; 10,388-EM and 10,390-EM and For Revocation of Notice to Bring Documents" and that on or before 5:00 p.m. April 28, 1971, the Commission by telephone notify counsel for Respondent of the entry of, or refusal to enter, such temporary stay of Notice to Bring Documents."

11. As of the date and hour of the filing of this Complaint with the Court neither Chrysler Corporation or its attorneys have been advised that it has stayed its order directing Chrysler Corporation to produce documents.

12. The Commission's failure to stay its Notice order of April 16 pending resolution of the "Motion to Dismiss Complaints and Revoke Notice" places Chrysler Corporation in the unfair, unreasonable, and irreparably damaging posture of (1) complying with the Commission's notice, with the attendant expenditure and waste of vast quantities of clerical hours and wages and consequent

disruption of the normal clerical activities during a time of heavy automobile production, all for the purpose of providing data as to time-barred complaints, which expenditure and disruption will irreparably damage Chrysler Corporation; or (2) not complying with the Commission notice and thus being placed in the unfair, unreasonable and untenable position of being in violation of a Michigan Civil Rights Commission order, with the attendant consequences thereof, including public opprobrium and publicity which would irreparably damage the good will and reputation which Chrysler Corporation has and does enjoy with the people of the State of Michigan.

13. Chrysler Corporation has no other plain, speedy or adequate remedy and therefore seeks remedies in this court.

WHEREFORE, Chrysler Corporation prays:

A. That the defendant Commission be ordered to show cause at a hearing scheduled for an early date, why a mandatory order of superintending control should not be issued by this Court directing defendant Commission to dismiss complaints 10,330-EM; 10,332-EM; 10,388-EM and 10,390-EM and to refrain from any further proceedings in those matters, and to revoke the "Notice" order dated April 16, 1971.

B. That said Order to Show Cause further restrain the defendant Commission from conducting any further proceedings in complaint matters 10,330-EM; 10,332-EM; 10,388-EM and 10,390-EM during the pendency of this matter before this Court.

C. That, following the hearing prayed for in paragraph A, above, a mandatory order of superintending control be issued by this Court directed to the defendant Commission to dismiss complaints 10,330-EM; 10,332-EM; 10,388-EM and 10,390-EM, and to wholly refrain from further proceedings in that matter, and to revoke the "Notice" order dated April 16, 1971.

OR IN THE ALTERNATIVE Chrysler Corporation prays:

A. That the defendant Commission be ordered to show cause at a hearing scheduled for an early date why a mandatory order of superintending control should not be issued by this Court directing defendant Commission to stay its notice order of April 16, 1971 pending the Commission's hearing of and decision upon the Motion for Dismissal of Complaints Nos. 10,330-EM; 10,332-EM; 10,388-EM and 10,390-EM and For Revocation of Notice to Bring Documents filed by plaintiff Chrysler Corporation on April 27, 1971 and until further order of this Court.

B. That said order to show cause further restrain the defendant Commission during the pendency of this matter before this court, from conducting any further proceedings in complaint matters 10, 330-EM; 10,332-EM; 10,388-EM and 10,390-EM, other than the hearing of and decision upon plaintiff's motion described in paragraph A.

C. That following the hearing prayed for in paragraph A, above, a mandatory order of superintending control be issued by

this court directed to the defendant Commission to stay its notice order of April 16, 1971 pending the Commission's hearing of and decision upon the Motion for Dismissal of Complaints Nos. 10,330-EM; 10,332-EM; 10,388-EM and 10,390-EM and For Revocation of Notice to Bring Documents filed by Chrysler Corporation on April 27, 1971 and until further order of this Court.

D. That Chrysler Corporation be granted such other and further relief as this court may deem just and proper.

DICKINSON, WRIGHT, McKEAN & CUDLIP

By \_\_\_\_\_

LAWRENCE M. KELLY

Attorneys for Plaintiff, Chrysler Corporation

800 First National Building

Detroit, Michigan 48226

962-5860

OF COURSE:

A. William Rolf  
Ralph Paul Fichtner  
Chrysler Corporation  
P. O. Box 1919  
Detroit, Michigan 48231

Dated: April 29, 1971