

CONFIDENTIAL ATTORNEY/CLIENT PRIVILEGED
MEMORANDUM

TO: [REDACTED]
FROM: [REDACTED]
DATE: 9-10-13
RE: Goodman

Today, I spoke [REDACTED] who claims to be a certified mechanic for Bentley automobiles. He originally called Roy Black's office after watching Goodman's trial on television. They wrote an email to John and you forwarded it to me on Sat., May 11, 2013. I contacted and spoke by telephone to [REDACTED] Monday, May 13, 2013.

[REDACTED] initially told me that he was a mechanic who worked on Bentley "GTC" models. For [REDACTED]

[REDACTED] he worked on Bentley, [REDACTED]

[REDACTED] vehicles.

He told me that he also does roadside assistance on these vehicles. He claims that there was a factory "Bulletin" issued in 2007. "Bulletin" is the term used similar to a factory recall. He says that it tells dealers to fix a problem rather than recall these very expensive vehicles. He claims the bulletin addresses the exact claim defense raised in the trial.

[REDACTED] said he would get a copy of this "Bulletin" and call me when he received it. He says no one from Bentley would have the courage to come forward or they would be fired. He says the expert that the State called to testify made many false statements which he could also point out to the defense.

[REDACTED] wanted to meet in person w/ Roy Black and John Goodman. [REDACTED]

[REDACTED] I told him that I would discuss him w/ the attorneys and get back with him in near future.

He told me that he would fax his resume to me and he did later on 5-17-13.

We spoke again on a number of times by phone. He said that he has a binder w/ all of the dates and times he has worked on Bentley cars. He says it is part of his certification process that the dealers document all activity performed. He also says that he has film of himself when he does this work. I told him to bring all of his documentation when we are able to meet in person.

He has consistently maintained that this "Bulletin" is in possession of Bentley [REDACTED]