

Ford otherwise objects to the request because it is overly broad, unduly burdensome, and seeks information that is neither relevant to the subject matter of this action nor reasonably calculated to lead to the discovery of admissible evidence. Ford also objects to this request to the extent it seeks information that is protected from disclosure by the attorney-client privilege, work product doctrine, consulting expert privilege, joint defense privilege, or any other applicable privilege.

Request No. 4

Current training provided to YOUR employees about asbestos.

RESPONSE: With the exception of the student guide, entitled "Motorcraft: Advanced Brake Service and Brake Lathe Training," which is being produced herewith, a copy of the training resources currently provided to both Ford employees and dealership mechanics concerning automobile servicing, including but not limited to brake and clutch repair and replacement, is available to Plaintiff in the public domain on Ford's Motorcraft website for a nominal per course fee, and is located at www.motorcraft.com. Older resources are also available to Plaintiff in the public domain on a third party website for a nominal per course fee, and are located at www.helminc.com.

Ford otherwise objects to the request because it is overly broad, unduly burdensome, and seeks information that is neither relevant to the subject matter of this action nor reasonably calculated to lead to the discovery of admissible evidence. This request is not limited to a reasonable scope, and instead seeks information relating to any training provided to Ford employees concerning asbestos, without any limitation to those training materials relating to the repair or replacement of asbestos-containing friction vehicle components to which Mr. Parson was allegedly exposed. Ford also objects to this request to the extent it seeks information that is