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JAN 28 2003
By _____

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Attorneys for Defendant
FORD MOTOR COMPANY

SUPERIOR COURT OF THE STATE OF CALIFORNIA
IN AND FOR THE COUNTY OF SAN FRANCISCO

HAROLD HOLDER and SHIRLEY
HOLDER,

Plaintiffs,

vs.

ACandS, Inc., et al ,

Defendants.

Case No.: 414546

**FORD MOTOR COMPANY'S
ANSWERS TO PLAINTIFF'S CASE
SPECIFIC STANDARD
INTERROGATORIES, SET NO. ONE**

PROPOUNDING PARTY: Plaintiff HAROLD HOLDER and SHIRLEY HOLDER

RESPONDING PARTY: Defendant FORD MOTOR COMPANY

SET NO.: ONE

GENERAL OBJECTIONS

1. These responses are based upon facts known or believed by Ford at the time of answering these interrogatories. Much of the information requested dates back many years and is difficult or impossible to reconstruct or retrieve. These discovery responses are made pursuant to a reasonable and duly diligent investigation and search for the information requested. Ford reserves the right to amend these responses if new or additional information becomes available.

2. Ford further objects to these interrogatories to the extent that they are overly broad, vague, ambiguous, and are not reasonably limited in scope or time.

1 or describe such DOCUMENTS with sufficient particularity that they may be made the subject of
2 a request for production of documents;

3 E. IDENTIFY the person(s) presently most knowledgeable about the information
4 sought in this interrogatory or its subparts.

5 **ANSWER:**

6 Vehicles manufactured by Ford incorporated brake friction products such as
7 linings, which are composed, in part, of asbestos. Ford purchased these components from
8 suppliers. Ford understands the type of asbestos fibers used to be chrysotile. Because
9 Ford did not manufacture these components, it does not know percentages of asbestos that
10 they contain.

11 Ford further states that it sold service parts, which included brake linings, pads and clutch
12 facings, through franchised Ford dealers and authorized distributors in the United States. These
13 aftermarket parts were sold under the name of Ford or Ford Authorized Remanufacturers.

14 Ford objects to this interrogatory because it is overly broad, unduly burdensome, and seeks
15 the discovery of information or documents that are neither relevant to the issues in this lawsuit nor
16 reasonably calculated to lead to the discovery of admissible evidence.

17 **INTERROGATORY NO. 2**

18 IDENTIFY each person who prepared or assisted in the preparation of the responses to
19 these interrogatories. (Do not identify anyone who simply typed or reproduced the responses.)

20 **ANSWER:**

21 These are the responses of Ford, which have been prepared by and under the supervision of
22 Ford's attorneys, including counsel of record in this lawsuit, and with the assistance of various
23 Ford employees. The answers are verified on Ford's behalf by a duly authorized agent as required
24 under the applicable rules.

25 To the extent this Interrogatory seeks an additional or different response, Ford objects
26 because it seeks information protected from disclosure by the attorney-client privilege and the
27

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1 3. Ford objects to each and every request to the extent that it seeks information which
2 does not refer or relate to the events, occurrences, time periods, or locations at issue in this lawsuit
3 and, as such, is not reasonably likely to lead to the discovery of admissible evidence. Such
4 discovery is irrelevant, unduly burdensome and harassing

5 4. Ford objects to each and every request to the extent that it requires the disclosure of
6 information (a) that was prepared in anticipation of litigation; (b) that constitutes privileged
7 attorney-client material; (c) that constitutes attorney work product; (d) that is subject to any other
8 privilege; and/or, (e) that is otherwise protected from disclosure.

9 5. Ford objects to each and every request to the extent that it seeks information equally
10 available to Plaintiff.

11 6. Ford objects to each and every request to the extent that it is overbroad, burdensome,
12 oppressive, harassing and repetitious.

13 7. The above-stated objections are hereby made applicable to each of Plaintiff's requests
14 and admissions and are incorporated into each response as though set forth in full. Each response
15 shall be deemed to be subject to, and shall not waive, any of the foregoing objections.

16 **INTERROGATORY NO. 1**

17 Were any of THIS DEFENDANT'S ASBESTOS-CONTAINING FRICTION PRODUCTS
18 sold, shipped, MARKETED or otherwise distributed either to or for use at the DESCRIBED
19 SITES at or before the time designated in the Notice? If so:

20 A. IDENTIFY and state the NATURE and quantity of the ASBESTOS-
21 CONTAINING FRICTION PRODUCTS;

22 B. IDENTIFY to whom said ASBESTOS-CONTAINING FRICTION PRODUCTS
23 were sold;

24 C. IDENTIFY to whom said ASBESTOS-CONTAINING FRICTION PRODUCTS
25 were shipped;

26 D. Either attach all DOCUMENTS or disks containing such data, evidencing the
27 information sought in this interrogatory and its subparts to YOUR answers to these interrogatories
28

1 attorney work-product doctrine, is overly broad and unduly burdensome, and seeks information
2 that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

3 **INTERROGATORY NO. 3**

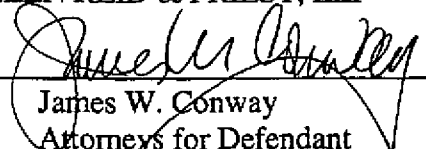
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5 If any person YOU have identified in YOUR answers to these interrogatories has had his
6 or her deposition taken, IDENTIFY the deposition by the name of the deponent, the date the
7 deposition was taken, the caption and number of the action in which it was taken, the court which
8 had jurisdiction over the action in which it was taken (including state and county) and either the
9 name and address of the court reporting agency which took the deposition or the name and address
10 of deponent's counsel of record.

11 **ANSWER:**

12 Ford refers to and incorporates herein its answer and objection to Interrogatory No. 2.

13
14 DATED: January 23, 2003

THELEN REID & PRIEST, LLP

By: 

James W. Conway

Attorneys for Defendant

FORD MOTOR COMPANY

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8 Attorneys for Defendant
9 FORD MOTOR COMPANY

10 SUPERIOR COURT OF THE STATE OF CALIFORNIA

11 IN AND FOR THE COUNTY OF SAN FRANCISCO

12 HAROLD HOLDER and SHIRLEY
13 HOLDER,

Case No.: 414546

PROOF OF SERVICE

14 Plaintiffs,

15 vs.

16 ACandS, Inc., et al.,

Defendants.

PROOF OF SERVICE BY MAIL

CASE NO. 414546

17 I am over the age of 18 and not a party to the within action. I am employed in the County
18 of San Francisco, State of California by Thelen Reid & Priest LLP. My business address is
19 101 Second Street, Suite 1800, San Francisco, California 94105-3606.

20 On January 24, 2003, I served the following entitled document:

21 **FORD MOTOR COMPANY'S ANSWERS TO PLAINTIFF'S**
22 **CASE SPECIFIC STANDARD INTERROGATORIES, SET NO.**
23 **ONE**

24 by placing a true and correct copy thereof in a sealed envelope addressed as follows:
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LEVIN & SIMES
160 SANSOME STREET
12TH FLOOR
SAN FRANCISCO, CA 94104

I am readily familiar with the firm's business practice for collection and processing of correspondence for mailing with the United States Postal Service. On this day, I placed for collection and processing the above document to be deposited with the United States Postal Service in the ordinary course of business. And in the ordinary course of the firm's business, such correspondence is deposited with the United States Postal Service the same day that it is collected.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on January 24, 2003, at San Francisco, California.


David E. Schwartz