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NO. A-940,143

HAROLD KINTZ	§	IN THE DISTRICT COURT OF
VS.	§	ORANGE COUNTY, TEXAS
ALLIED SIGNAL, INC., ET AL	§	128TH JUDICIAL DISTRICT

DEFENDANT FORD MOTOR COMPANY'S RESPONSES
TO PLAINTIFFS' FIRST SET OF INTERROGATORIES

TO Plaintiff, Harold Kintz, by and through his attorney of record, Mr. Gregory Morrison, Cook & Butler, 4 Houston Center, 1221 Lamar, Suite 1300, Houston, Texas 77010

COMES NOW FORD MOTOR COMPANY, and pursuant to Rule 168, Texas Rules of Civil Procedure, files this its answers to interrogatories filed by Plaintiff.

Respectfully submitted,

MEHAFFY & WEBER
Attorneys for FORD MOTOR COMPANY

By Sandra F. Clark
Sandra F. Clark, Of Counsel
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CERTIFICATE OF SERVICE

An exact copy of the foregoing instrument has been furnished to all counsel of record on this the 22nd day of November, 1994.

Sandra F. Clark
SANDRA F. CLARK

NO. A-940,143

HAROLD KINTZ

IN THE DISTRICT COURT OF

vs

ALLIEDSIGNAL INC. ALLIEDSIGNAL
AUTOMOTIVE AFTERMARKET BRAKE a
division of Alliedsignal Inc.,
GARRETT AUTOMOTIVE, a division
of Alliedsignal Inc., ARMSTRONG
WORLD INDUSTRIES, INC., THE
CESSNA AIRCRAFT COMPANY,
CHRYSLER CORPORATION, DANA
CORPORATION, THE FLINTKOTE
COMPANY, FORD MOTOR COMPANY,
GAF CORPORATION, GENERAL MOTORS
CORPORATION, HI-LO AUTO SUPPLY,
L.P., THE HOME DEPOT, INC.,
MCCAULEY LUMBER COMPANY, MCCORD
CORPORATION, MCCORD PAYEN, INC.
and UNITED STATES GYPSUM COMPANY

ORANGE COUNTY, TEXAS

128TH JUDICIAL DISTRICT

DEFENDANT FORD MOTOR COMPANY'S RESPONSES
PLAINTIFFS' FIRST SET OF INTERROGATORIES

Responses provided herein have been prepared pursuant to a reasonable and duly diligent investigation and search for the information requested. For many years, Ford has had several hundred thousand employees. Many employees have worked at several of Ford's facilities. In conducting its business, Ford has each year created many millions of documents that have been kept in numerous locations and have been moved as organization changed and as employees changed jobs. Accordingly, Ford does not represent that these responses contained herein provide all information requested; rather, these responses reflect information obtained before this date by Ford pursuant to a reasonable

and duly diligent search and investigation in those areas where this information was expected to be found. To the extent that the request purports to require more, Ford objects on grounds that include that compliance with the request probably is not feasible and would impose an undue burden or expense.

Further, if additional discovery requests are served upon Ford in this action, Ford will not review the present discovery requests to ascertain whether, subsequent to Ford's serving of this response, new information that might be responsive to the present discovery requests has been obtained except, of course, as governed by rules of civil procedure. To the extent that the present request purports to impose such an obligation, Ford objects on grounds that the request contravenes rules and, in addition, seeks to impose an undue burden and expense.

To make responses to these requests feasible and responses pertinent to the allegation that there was a deleterious exposure to asbestos in brake lining dust or debris in Ford vehicles, it generally is appropriate to limit their scope to friction products and in particular to brake lining dust. Ford objects to requests for information about other subjects within the scope of activities of Ford on the grounds that the requests seek information that is neither relevant nor likely to lead to discovery of admissible evidence and that the requests are overly broad and burdensome. Also, Ford objects to requests for any and

all of something on grounds that the requests are overly broad and burdensome.

You have served Ford with a request and yet you already may have some pertinent documents, perhaps even some Ford documents not received from Ford. Ford objects on the grounds that it would be less burdensome, more convenient and less expensive for you to identify what documents you already have that fall within the scope of these requests. This would accomplish several purposes: (a) it would obviate Ford's having to search for and copy documents already in your possession; (b) it would enable Ford to use the documents provided by you as guides in looking for related material; and (c) it would, if your purposes were to obtain authentication of particular documents, enable Ford to authenticate the copies provided by you without having to conduct an uninformed search for those documents in Ford's files.

Ford objects to requests where the matter sought is neither relevant to the subject matter involved in the pending action nor reasonably calculated to lead to the discovery of admissible evidence.

Where Ford personnel have stored responsive documents, whether kept together by folder, clip, staple, or otherwise, only the responsive document will be produced.

Documents offered by Ford can be made available by providing marked usable copies for review in the office of Ford's counsel.

DEFINITIONS

As used in Ford's objections to these requests: (i) "Lack of Relevance" means that a request calls for information which is not relevant to the subject matter of the action and is not reasonably calculated to lead to the discovery of admissible evidence; (ii) "Burden" means that it would be unduly burdensome, oppressive, time-consuming or expensive to require Ford to compile and furnish the information in light of the degree of its relevance and materiality, if any; (iii) "Overly Broad" means that such request is overly broad as to scope, time or location; (iv) "Lack of Particularity" means that an interrogatory does not state with reasonable particularity the information to be furnished, is vague and ambiguous or incomprehensible; (v) "Improper Assumption" means that a request assumes facts which are not true or accurate; (vi) "Improper Opinion" means that an interrogatory improperly calls for an opinion, conclusion, contention or inference; (vii) "Privileged" means a request calls for information protected by the attorney-client privilege or the work product doctrine or the rule protecting materials prepared in anticipation of or in connection with litigation; and (viii) "Premature" means that a request calls for an opinion or contention that relates to fact or the application of law to fact and should not properly be required to be answered at this time.

These comments and objections are incorporated into each Ford response set forth below as if they were set forth in their

entirety as they apply to each response. Responses made after objections are not waivers of objections.

INTERROGATORY NO. 1: Identify (see definitions) all persons who may have knowledge of facts relevant to the subject matter of this lawsuit. (This interrogatory is meant to encompass all employees of Defendant's who have knowledge about Defendant's asbestos-containing products).

RESPONSE TO INTERROGATORY NO. 1:

Objections: Lack of Relevance. Burden. Overly Broad. Lack of Particularity. Privileged. Premature.

All investigations to date have been accomplished by the discovery process and, as such, are and have been totally available to the Plaintiff.

INTERROGATORY NO. 2: Identify any and all experts who may be called as a witness in this case or whose work product formed the basis, either in whole or in part, of the opinions of any experts who may be called as a witness. With respect to each such expert, describe or identify the following:

- a. the subject matter on which the witness is expected to testify;
- b. the mental impressions and opinions held by the expert regarding this case;
- c. the facts known to the expert (regardless of when the factual information was acquired) which relate to or form the basis of the mental impressions and opinions held by the expert;
- d. all documents and other tangible things, including all tangible reports, physical models, compilations of data and other material, prepared by or for an expert in anticipation of the expert's trial or deposition testimony;
- e. the name of each published treatise, periodical, or pamphlet that contains a statement upon which Defendant's expert witnesses intend to rely while testifying. Identify the specific piece of writing containing each statement by title, author and date. Set out each statement verbatim or attach a copy; and

- f. the case name, cause number, court and style of each case wherein such expert has given his/her deposition or court testimony.

RESPONSE TO INTERROGATORY NO. 2:

Ford has not yet retained any experts in this matter.

INTERROGATORY NO. 3: Has DEFENDANT been furnished a written or oral report from any of the experts identified in response to the foregoing interrogatory? If so, attach a copy of every written report and state the substance of every oral report given by said experts, in accordance with TEX. R. Civ. P. 166b(2) (e) (West 1994).

RESPONSE TO INTERROGATORY NO. 3:

See response to Interrogatory No. 2.

INTERROGATORY NO. 4: Identify all past and present divisions, subsidiaries or affiliated companies of defendant, which now, or at any time in the past, are/were engaged in any phase of manufacturing, sale, supply, purchase, application, installation, relabeling, processing or distribution of any vehicle components/parts, which contained asbestos, including by way of illustration but not limited to: brake friction products, brake linings, gaskets, pads and clutch facings, and set forth with particularity the precise relationship between such entity and defendant and the dates of such relationship(s), and identity the nature and extent of such functions during the years 1949 to the present.

RESPONSE TO INTERROGATORY NO. 4:

Objections: Lack of Relevance. Burden. Overly Broad. Lack of Particularity. Ford has never processed or manufactured brake linings or clutch facings for production vehicles. Manufacture, assembly and sale of cars, trucks and related parts and accessories constitute the principal business of Ford.

INTERROGATORY NO. 5: List by brand name all of DEFENDANT's asbestos-containing products. DEFENDANT's asbestos-containing products includes all products which contain any amount of asbestos manufactured, sold, designed, supplied, distributed, relabeled, resold, processed, applied or installed by, or for, DEFENDANT. "By or for" is meant to refer to Defendant, to all Defendant's predecessors in interest, (whether by purchase, merger, consolidation or otherwise), to all of defendant's subsidiaries, divisions, joint ventures or affiliates. If defendant claims that it did not ever manufacture its own

asbestos-containing products, please answer as to the products manufactured by others and incorporated into Ford's vehicles. As to each product, state the following:

- a. type of product (e.g., brake friction products, brake linings, gaskets, pads, clutch facings, etc.);
- b. the date the product first went into production;
- c. the last date the product was produced;
- d. the last date the product was sold;
- e. all manufacturing locations;
- f. dates of manufacture at each location;
- g. the percentage of asbestos (state if percentage is by volume or weight) and the dates and all reasons for any modification thereof;
- h. the type of asbestos;
- i. the specific source of asbestos with dates;
- j. the color, physical characteristic, and appearance of the product;
- k. a full and precise description of the package in which the product was sold, including, but not limited to, type of package, size, color (s), and writings thereon;
- l. all other names under which the product was sold;
- m. the number and dates of each patent or patent application as to the product;
- n. if the product continued to be produced after the deletion of asbestos, all reasons why the asbestos was deleted, the identity of the person who made the decision to delete the asbestos, and the date the product was first produced without the asbestos;
- o. if the product is no longer produced, all reasons it was discontinued, the identity of the person who made the decision to discontinue the product, the

- brand name of the replacement product, and the date the replacement product first went into production;
- p. a precise description of your identifying logo or initials and the dates of inclusion on the product;
 - q. state during what period of time such product has been associated with DEFENDANT;
 - r. identify any warning period of time such product has been associated with DEFENDANT;
 - s. identify any warning labels, inserts or other writings provided with such product and with every such printed warning, state what period of time it has or had accompanied the product, the exact wording of the warning, any amendments made to the wording, where the warning was located on each product or packaging, and on what asbestos products the warning appear(ed) ; and
 - t. geographic distribution range of each such product.

RESPONSE TO INTERROGATORY NO. 5:

Not applicable. Ford does not manufacture brake linings or assemblies for use in its production vehicles. Ford purchases them from suppliers. A list of Ford Suppliers is offered.

INTERROGATORY NO. 6: Did DEFENDANT perform, direct to be performed, finance, sponsor or receive the results of any studies or test concerning potential health hazards involved with the use of asbestos containing materials, whether to its own employees or to end users? If so, identify such studies or tests and state:

- a. When, where and at what intervals such studies were performed;
- b. Were such studies in writing or reported at a later date in writing;
- c. Were the results of such studies published or otherwise disseminated? If so, state to whom and when;
- d. Who performed such studies;
- e. What were the results of such studies?

RESPONSE TO INTERROGATORY NO. 6:

Objections: Lack of Relevance. Burden. Overly Broad. Lack of Particularity.

Ford states that commencing in the early 1970's, Ford participated in and provided partial funding for studies done by Dr. Irving Selikoff and others at what is now the Mt. Sinai School of Medicine in New York, which work was reported on in a paper entitled Asbestos Exposure During Brake Lining and Maintenance and Repair, published in "Environmental Research", Vol. 112, pp. 110-128 (1976). The work done was a study of the environmental pollution, if any, caused by asbestos in brake linings. The study came to focus on the occupational exposure of mechanics during brake repair and maintenance. Ford's Research and Engineering Department and Industrial Hygiene Department were advised of the study. The 1976 publication acknowledges the support received from Ford.

INTERROGATORY NO. 7: During the time period defendant manufactured, sold, supplied, applied, distributed or installed asbestos containing products, what tests have been performed by any governmental agency, body, commission or health organization including, but not limited to, the U.S. Public Health Service, OSHA, or NIOSH, in you plants or on job sites owned or controlled by you concerning: specific hazards associated with the use and handling of asbestos and asbestos products; any restrictions in use of same; requirements for medical surveillance and examinations for your workers; dust monitoring or availability of safety equipment? If such findings were made, identify:

- a. The date or dates of such findings and by which organization or entity such findings were made;
- b. The form in which such findings were made and, if written, the exact wording of same or location in regulation, order, bulletin, report or other writing;
- c. What steps were taken to comply with such findings and the dates when such acts of compliance occurred;
- d. How users of or bystanders exposed to asbestos or asbestos containing products were informed of such findings and if such information was written identifying same.

RESPONSE TO INTERROGATORY NO. 7:

Objections: Lack of Relevance. Burden. Overly Broad. Lack of Particularity. Premature.

INTERROGATORY NO. 8: During the time that defendant manufactured, sold, designed, supplied, distributed, relabeled, resold, processed, applied or installed asbestos containing products, did defendant perform, direct to be performed, finance, sponsor or receive the results of any dust monitoring tests at job sites where asbestos-containing products were being applied and/or removed? If so, state:

- a. The date and location of the first such test;
- b. When, where and at what intervals subsequent tests were performed;
- c. Who performed such tests;
- d. Where the results of such tests are maintained;
- e. What steps were taken by you to improve results of such tests, and dates when such improvements were made.

RESPONSE TO INTERROGATORY NO. 8:

Objections: Lack of Relevance. Burden. Overly Broad. Lack of Particularity. Premature.

INTERROGATORY NO. 9: If defendant's answer to the above interrogatory is in the negative, state the reasons for not performing dust monitoring tests.

RESPONSE TO INTERROGATORY NO. 9:

Objections: Lack of Relevance. Burden. Overly Broad. Lack of Particularity. Premature.

INTERROGATORY NO. 10: During the time that DEFENDANT sold manufactured, designed, supplied, distributed, relabeled, resold, processed, applied or installed asbestos containing products, did DEFENDANT ever have any inspectors or anyone from the company whose job it was to go to areas where you asbestos containing products were being used, removed or installed to make a dust level count? If so, state when this procedure started, the purpose of such procedure and the findings and what action, if any, was taken in response to the findings, and attach results.

RESPONSE TO INTERROGATORY NO. 10:

Objections: Lack of Relevance. Burden. Overly Broad. Lack of Particularity. Premature.

INTERROGATORY NO. 11: During the time that DEFENDANT manufactured, sold, designed, supplied, distributed, relabeled, resold, applied or installed asbestos containing products, identify any medical examination programs offered or sponsored by DEFENDANT or its insurance carrier(s) for employees of its insured handling or otherwise exposed to asbestos, or for those employed by other entities who supplied asbestos containing products to DEFENDANT. With respect to each program, state:

- a. Manner of communication with employees about such program;
- b. Whether examination was mandatory or optional;
- c. What percentage of workers were permitted to undergo such examination participated;
- d. What percentage of workers were found to have asbestosis or mesothelioma;
- e. With respect to (d), what percentage of such workers were paid disability or workmen's compensation benefits or for whose benefit medical expenses were paid to undergo treatment for such conditions.

RESPONSE TO INTERROGATORY NO. 11:

Objections: Lack of Relevance. Burden. Overly Broad. Lack of Particularity. Premature.

INTERROGATORY NO. 12: Did defendant direct to be performed, sponsor, finance or receive the results of any studies or tests performed by the Saranac Lake Laboratory to the Trudeau Foundation relating to asbestos exposure and its effects upon human life? If so, identify:

- a. All documents summarizing findings or results of those studies or tests which you have in your possession or control;
- b. All communications, oral or written, between answering DEFENDANT and Saranac personnel

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including, but not limited to, Gerrit W.H. Schepers, M.D. and George Wilbur Wright, M.D.;

- c. All documents relating to Saranac Studies received or submitted by DEFENDANT whether directly, through associate or predecessor companies, through other companies, or through trade associations, organizations or other entities;
- d. All recommendations or findings of such studies relating to:
 - 1. adequacy of threshold limit values;
 - 2. substitution of material other than asbestos.
- e. Medical programs related to asbestos health hazards to be offered or sponsored by DEFENDANT.

RESPONSE TO INTERROGATORY NO. 12:

No.

INTERROGATORY NO. 13: Prior to December 31, 1989, has any employee of DEFENDANT ever made a claim for any asbestos related disease under the Occupational Disease or Workmen's compensation Statute of any state? If so, state:

- a. The date that DEFENDANT first received notice of such claim;
- b. The total number of such claims per year received to date;
- c. The number of such claims for which disability benefits and/or medical expenses were paid by DEFENDANT;
- d. Identify all person to whom disability benefits and/or medical expenses were paid by DEFENDANT and the exact medical diagnosis, disease and/or condition for which such benefits/expenses were paid.

RESPONSE TO INTERROGATORY NO. 13:

Objections: Lack of Relevance. Burden. Overly Broad. Lack of Particularity. Premature.

Ford's records do not permit retrieval of this information as injuries alleged are described in general terms such as: lungs, chest, back, silicosis, bronchitis, emphysema,

pneumoconiosis, cough, pulmonary system, etc., resulting from exposure to "deleterious substances" or "atmospheric pollutants." It is impossible to ascertain from these records whether or not the alleged injury was associated with asbestos exposure. Furthermore, because of the differences in occupational exposure, the information sought would not be relevant to the claims asserted herein.

INTERROGATORY NO. 14: If defendant contends that Harold Kintz misused DEFENDANT's asbestos containing products, then state in what manner it is contended that Harold Kintz misused these products? If "Yes", then state in what manner and under what circumstances each product was misused. Also state what Harold Kintz could have done to avoid such misuse.

RESPONSE TO INTERROGATORY NO. 14:

Objections: Lack of Relevance. Burden. Overly Broad. Lack of Particularity. Premature.

Unknown.

INTERROGATORY NO. 15: What is Defendant's present net worth?

RESPONSE TO INTERROGATORY NO. 15:

Objections: Lack of Relevance. Burden. Overly Broad. Lack of Particularity. Premature.

A recent annual report is offered.

INTERROGATORY NO. 16: How many claims or lawsuits (other than workers' compensation claims) were filed against DEFENDANT in the 1930's - 1960's alleging, in whole or in part injury, damage or disease from exposure to or inhalation of various dusts? This interrogatory includes cases of asbestosis, pneumoconiosis and silicosis due to the fact individuals were or may have been exposed to mixed types of dusts.

RESPONSE TO INTERROGATORY NO. 16:

See response to Interrogatory No. 13.

INTERROGATORY NO. 17: Please identify each product developed and/or used by DEFENDANT to replace those asbestos-containing products and/or components previously used in DEFENDANT's vehicles. For each, please state exactly when the development of the product was begun, the length of time it took to get the product into production use, and results of testing by, or on

behalf of, DEFENDANT to verify that the new product would perform as expected.

RESPONSE TO INTERROGATORY NO. 17:

The first application of non-asbestos brakes was on light trucks in 1976. Other Ford makes presently utilize fiberglass, steel wool and semi-metallic materials as a substitute for asbestos.

INTERROGATORY NO. 18: Outside of dealers authorized to sell and repair Ford Motor Company vehicles, what other stores, distributors etc. were authorized to sell and/or supply the products identified in response to Interrogatory No. 3 above, in the following geographic areas in the years indicated:

- a. Reading, Pennsylvania, 1949-1962;
- b. Bakersfield, California, 1962-1972;
- c. Orlando, Florida, 1972-1976; and
- d. Houston, Texas, 1976 to the present.

RESPONSE TO INTERROGATORY NO. 18:

Objections: Lack of Relevance. Burden. Overly Broad. Lack of Particularity. Premature.

Ford has a great number of distributors throughout the United States.

INTERROGATORY NO. 19: Identify the number of previous lawsuits in which Defendant has been a party wherein the Plaintiff(s) allege an illness, injury, disease, or damages arising from exposure to asbestos-containing products. For each such lawsuit filed within the last five (5) years, state the place (city, county, and state) of filing of the lawsuit, the style of the lawsuit, the date of the filing of the lawsuit, the court (J.P., county or district) in which filed, and the nature of the lawsuit.

RESPONSE TO INTERROGATORY NO. 19:

Objections: Lack of Relevance. Burden. Overly Broad. Lack of Particularity. Premature.

Because of the differences in occupational exposures, the information sought would not be relevant to the claims asserted herein.

INTERROGATORY NO. 20: If defendant contends that the acts or omissions of Harold Kintz or those of anyone else caused or contributed to the illness and death of Harold Kintz, identify such persons or entities, the specific act(s) of which defendant complains, and each person or entity with knowledge of facts regarding this contention.

RESPONSE TO INTERROGATORY NO. 20:

Objections: Lack of Relevance. Burden. Overly Broad. Lack of Particularity. Premature.

Unknown.

INTERROGATORY NO. 21: Has DEFENDANT made any settlement agreements relating to case? This includes, but is not limited to, Mary Carter agreements, indemnity agreements and "hold harmless" agreements. If so, please provide the contents of agreements pursuant to TEX. R. CIV. P. 166b(2) (f) (2).

RESPONSE TO INTERROGATORY NO. 21:

No.

INTERROGATORY NO. 22: To the extent that DEFENDANT did not manufacture all of the asbestos-containing component parts incorporated into vehicles manufactured by DEFENDANT for sale in the United States, please state the following:

- a. The type of asbestos-containing component part (e.g. brake friction products, brake linings, gaskets, pads, clutch facings, etc.) it was;
- b. Identify the company who did manufacture each such component part (and the years the same were sold to DEFENDANT for use in vehicles sold here in the United States);
- c. The percentage of asbestos (state if percentage is by volume or weight), and the dates and all reasons for discontinuing use of said product);
- d. The type of asbestos in the product; and
- e. The color, physical characteristics, and appearance of the product.

RESPONSE TO INTERROGATORY NO. 22:

Because Ford does not manufacture brake linings, pads and clutch facings. it does not have adequate information with which to answer. Less or no asbestos is used in disc brakes as compared to drum brakes. Ford believes only chrysotile has been used in asbestos-containing brake linings in Ford vehicles. Ford does not know the percentage of asbestos they contain, but generally, it is thought to be between 40% and 60% by weight in linings.

INTERROGATORY NO. 23: At any time, has DEFENDANT discontinued the use of asbestos-containing component parts in the manufacture of vehicles for sale to any country outside the United States? If so, please state to what countries, the reason(s) for the discontinuance, the substitute component part used, and the years when such changes were made.

RESPONSE TO INTERROGATORY NO. 23:

See response to Interrogatory 17.

INTERROGATORY NO. 24: For each of the organizations to which defendant admits being a member in Request for Admission Nos. 25-40, please provide the years in which DEFENDANT was a member.

RESPONSE TO INTERROGATORY NO. 24:

Objections: Lack of Relevance. Burden. Overly Broad. Lack of Particularity. Premature.

Ford or Ford employees, or both, have had memberships in the American Society for Testing and Materials, Society of Automotive Engineers and the American Industrial Hygiene Association. Ford cannot identify all of its employees who have been or are members of these organizations. Ford also had a membership from January 1947 through December 1974 in the Industrial Health Foundation, formerly known as the Industrial Hygiene Foundation.

Ford is a member of the National Association of Manufacturers, 1176 F. St., N.W., Washington, D.C. 20006; Michigan Manufacturers Association; Motor Vehicle Manufacturers Association, 300 New Center Building, Detroit, Michigan 48202; and the National Safety Council, 444 N. Michigan Ave., Chicago, Illinois 60611.

It has been reported by representatives of these respective organizations that there is no record of Ford's membership in these following organizations: Institute of Occupational & Environmental Health, Quebec Asbestos Mining Association, Brake Lining Manufacturers Association, Friction Materials Standards Institute, Grinding Wheel Institute, Asbestos Tile Institute, Asbestos Information Association, Trudeau Foundation, Asbestos Brake Lining Manufacturers Institute.

STATE OF MICHIGAN)
) SS
COUNTY OF WAYNE)

_____, being duly sworn, deposes and says that he is an authorized agent of Ford Motor Company and that he verifies the foregoing _____ and is duly authorized to do so; that the matters stated therein are not within the personal knowledge of deponent, that the facts stated therein have been assembled by authorized employees and counsel of Ford Motor Company, and deponent is informed that the facts stated therein are true.

FORD MOTOR COMPANY

By: _____

Subscribed and sworn to before me
this _____ day of _____, 19__.

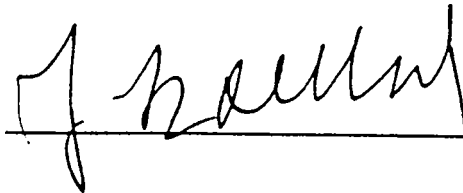
Notary Public
____ County, ____
My Commission Expires: ____

ALC/18260/9999/CS3/2

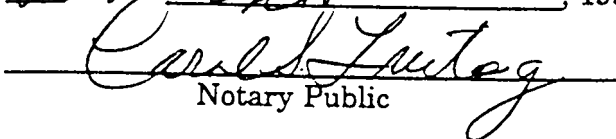
STATE OF MICHIGAN)
) ss.
COUNTY OF WAYNE)

JEROME R. DROUILLARD

, being duly sworn, deposes
and says that he is an authorized agent of Ford Motor Company, and that
he verifies the foregoing RESPONSES TO FIRST SET OF
INTERROGATORIES on behalf of Ford Motor Company; that certain of the
matters stated therein are not within the personal knowledge of deponent;
that the facts stated therein have been assembled by authorized employees
and counsel of Ford Motor Company, and deponent is informed that the fact
stated therein are true.



Subscribed and sworn to before me this
16th day of May, 1994.


Notary Public

CAROL S. FREITAG
Notary Public, Oakland County, Michigan
Acting in Wayne County, Michigan
My Commission Expires July 29, 1996