

Request No. 8

The "box study" referenced in the bills from ChemRisk to YOU. (see e.g. ChemRisk invoice nos. 20667, 20902, 21308, produced in Mallia, Dade County Case No.: 04-16237 CA 42) and referenced in depositions of Dennis Paustenbach dated 7/1/2005 and 4/6/2006 as the box opening study.

RESPONSE: After a reasonable and diligent search, Ford was unable to locate any documents relating to the study specifically identified by Plaintiff (i.e., "box study"). Ford's investigation of these issues is ongoing, and Ford reserves the right to supplement this answer if additional information is located.

Ford otherwise objects to this 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. 9

Ford STARS training information, provided to Ford Motor Company's technicians.

RESPONSE: With respect to "Ford STARS," Ford states that it is merely a tracking database that identifies what training, if any, a particular individual has completed. It does not contain any substantive training materials. As such, Ford states that it has no responsive documents with respect to this request. To the extent Plaintiff's meant "FordSTARS," the satellite-based training system, Ford states that it is no longer the training system used to transmit training materials to mechanics with respect to automobile servicing, including brake and clutch