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CHRIS N. KOLOS

March 13, 1997

David M. Lipman, Esquire
5901 S.W. 74th Street
Suite 304
Miami, Florida 33143**Re: *Tinker v. Mack Trucks, Inc., et al.***
Ontario County Index No.: 83778

Dear David:

Enclosed please find Mack's Verified Answers to Plaintiff's First Set of Interrogatories as we agreed, Verified Answers to the Second Set of Interrogatories and a Supplemental Response to the Request for Production. These responses, I believe, should address all the issues raised in your motion, and I would request that you withdraw the motion as to Mack Trucks.

I will briefly discuss the items raised in your motion in the order stated therein and indicate to you where the response is provided.

Product Interrogatory (First Set) No. 15 - Response enclosed.**Product Request for Production No. 6 - Supplemental response enclosed.****Product Interrogatory (First Set) No. 12 and Product Interrogatory (Second Set) No. 10** - Mack answered Interrogatory No. 10 in the Second Set back on January 17, 1997. Verified Answers are also enclosed. In light of this answer, Mack Trucks was not required to answer Interrogatory No. 12 of the First Set as per our agreement.**Product Interrogatory (First Set) No. 13 and Product Interrogatory (Second Set) No. 11** - Mack Trucks answered Interrogatory No. 11 of the Second Set back on January 17, 1997. Verified Answers to this Interrogatory are also enclosed. As per our agreement, an answer to Interrogatory No. 13 of the First Set was not required.

Product Interrogatory (Second Set) No. 9 - Please review Mack's Verified Answer to Interrogatory No. 9 of the Second Set. Mack has answered this Interrogatory to the best of its ability.

Product Interrogatory (First Set) No. 11 - See enclosed Answer.

Product Request for Production No. 4 - See Mack's Supplemental Response to Request for Production enclosed herewith.

Product Interrogatory (First Set) No. 14 - See enclosed Answer to the First Set.

Product Interrogatory (First Set) No. 10 - See enclosed Answer.

Product Interrogatory (First Set) No. 9 - As per our agreement, Mack does not have to answer Interrogatory No. 9 of the First Set. The information regarding testing is provided by Mack in Answer to Interrogatory No. 8 of the Second Set.

Product Request for Production Nos. 3, 8 - The response to Request for Production No. 3 relates to Interrogatory 9 of the Plaintiff's First Set of Interrogatories which Mack was not required to answer. Request for Production No. 8 was answered back on January 17, 1997. No documents were provided because there are no documents to produce.

Product Request for Production No. 12 - See Mack's Supplemental Response to Request for Production. There are no documents available to produce.

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Product Request for Production No. 7, 11 - It seems like there has been some confusion here as Navistar is discussed in your chart. Mack fully responded to these Requests for Production.

Product Interrogatory (First Set) No. 4 - As per our agreement, Mack Trucks was not required to answer Interrogatory No. 4 of the First Set. Responsive information is provided in Mack's Answer to Interrogatory No. 3 of the Second Set.

Product Interrogatory (First Set) No. 5 - Also, as per our agreement, Mack was not required to answer Interrogatory No. 5 of the First Set. Responsive information was provided in Mack's answer to Interrogatory No. 4 of the Second Set.

Product Interrogatory (First Set) No. 7 - Also, as per our agreement, Mack Trucks was not required to answer Product Interrogatory No. 7 of the First Set. What Mack manufactured is discussed in answer to Interrogatory Nos. 3 and 5 of the Second Set.

Product Interrogatory (First Set) No. 8 - Again, this is one Mack was not required to answer. Responsive information is provided in Mack's Answers to Interrogatory Nos. 4 and 6 of the Second Set.

Product Interrogatory (Second Set) No. 4(B) - You claim a deficiency concerning the years Mack Trucks sold asbestos-containing products. Please review Mack's Verified Answer to this Interrogatory. I believe subparagraph (B) of Interrogatory No. 4 is answered.

Product Interrogatory (Second Set) No. 5(D) - Since Mack does not contend its trucks were asbestos free for the 1970-1980 time period, subparagraph (D) is not applicable.

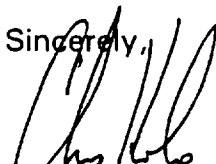
Product Interrogatory (Second Set) No. 6 - As for subparagraph (D), I refer you back to the discussion in the immediately preceding paragraph. As for subparagraph (B), Mack answered this Interrogatory to the best of its ability. See Mack's Verified Answer to this Interrogatory.

Product Interrogatory (First Set) No. 6 - As per our agreement, Mack was not required to answer this Interrogatory. Responsive information is provided in response to Interrogatory No. 7 of the Second Set.

Product Interrogatory (Second Set) No. 7 - (7b) - the names of Mack's suppliers were provided; (7c) - if the suppliers used a trade or brand name other than their own manufacturing name, such information is unknown to Mack; (7e) - this Interrogatory is answered to the best of Mack's ability, specific information is not known; (7g) - the specific amount of asbestos in each of the products is unknown as stated; (7h) - this is fully answered.

I would appreciate your review of Mack's discovery responses and your quick response to Mack's request for withdrawal of your Motion to Compel. Thank you for your cooperation.

Sincerely,



Chris N. Kolos

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Enclosures