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May 19, 2006

Randy L. Gori
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2227 S. State - Route 157
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Edwardsville, Illinois 62025

Re: In Re All Goldenberg Asbestos Cases

Dear Counsel:

Attached please find Ford Motor Company's Supplemental Response to Plaintiff's
Discovery Requests in Response to the Court's April 25, 2006 Order and privilege log.

Very truly yours,

SANCHEZ DANIELS & HOFFMAN

By: 
Suzanne Erler
Paralegal

Attachments

cc: All Counsel of Record via File and Serve w/o attachments

**IN THE CIRCUIT COURT
THIRD JUDICIAL CIRCUIT
MADISON COUNTY, ILLINOIS**

IN RE: ALL GOLDENBERG, MILLER,)
HELLER & ANTOGNOLI, P.C.,)
ASBESTOS CASES,)

Plaintiffs,)

vs.)

A.W. CHESTERTON, INC., et al.,)

Defendants.)

**FORD MOTOR COMPANY'S SUPPLEMENTAL RESPONSE
TO PLAINTIFFS' DISCOVERY REQUESTS IN RESPONSE
TO THE COURT'S APRIL 25, 2006 ORDER**

Defendant Ford Motor Company ("Ford") herein submits its Supplemental Responses to Plaintiffs' Requests for Production Directed to Defendants, Ford Motor Company in compliance with the April 25, 2006 Court Order.

PRELIMINARY STATEMENT

Ford's responses to plaintiffs' requests have been prepared in full compliance with the Illinois Supreme Court Rules, pursuant to a reasonable and duly diligent search for information properly requested and as set forth in the April 25, 2006 Court Order. To the extent that the requests seek information that is protected from disclosure by the attorney-client privilege, work product doctrine, consulting expert privilege, or any other applicable privilege, Ford will produce a privilege log for those documents being withheld on the grounds of such a privilege.

RESPONSES TO REQUESTS FOR PRODUCTION OF DOCUMENTS

Subject to the foregoing statements, Ford responds to each individual item number identified on the April 25, 2006 Court Order as follows:

ITEM NO. 1

Contracts for consulting services related to asbestos litigation entered into with Dennis Paustenbach, Brent Finley, Patrick Hessel, Michael Goodman, Mary Jane Teta and David Garabrant (hereinafter "the Experts"), or with Exponent, Inc., Chemrisk, Inc., or Epilung Consulting for the services of the Experts.

RESPONSE:

In a good faith effort to comply with the Court Order, and after a reasonable inquiry and diligent search in those areas of the company where responsive information would likely be located, Ford states that it was unable to locate any relevant, non-privileged documents concerning any contracts for consulting services related to asbestos litigation entered into with "the Experts." To the extent any relevant, but privileged documents were located, Ford refers Plaintiff to its Privilege Log (See Exhibit A attached).

ITEM NO. 2:

Communications with the Experts, including drafts of reports and presentations, which discuss or identify work performed regarding Ford's defense of asbestos friction litigation claims, excluding documents that contain only case specific information.

RESPONSE:

In a good faith effort to comply with the Court Order, and after a reasonable inquiry and diligent search in those areas of the company where responsive information would likely be located, Ford states that it was unable to locate any relevant, non-privileged documents concerning any asbestos friction litigation-related communications with "the Experts." To the

extent any relevant, but privileged documents were located, Ford refers Plaintiff to its Privilege Log (See Exhibit A attached).

ITEM NO. 3:

The total amount that Ford paid the Experts in connection with the defense of asbestos friction litigation claims from January 1, 2001 to the present.

RESPONSE:

In a good faith effort to comply with the Court Order, and after a reasonable inquiry and diligent search in those areas of the company where responsive information would likely be located, Ford states that the amounts identified below have been paid to the following experts in connection with the defense of asbestos friction litigation claims from January 1, 2001 to the present:

Name	2001	2002	2003	2004	2005	2006	Total
Chemrisk			\$171,214.15	\$735,030.32	\$797,787.75	\$336,877.17	\$2,040,909.39
Epilung				\$15,711.25	\$134,472.75	\$53,803.59	\$203,987.59
Exponent	\$853,650.69	\$1,988,754.17	\$1,602,457.30	\$1,844,472.33	\$837,500.29	\$379,117.36	\$7,505,952.14
Michael Goodman						\$7,964.60	\$7,964.60
David Gararbrant	\$18,228.32	\$27,413.30	\$52,767.62	\$75,813.58	\$16,552.03	\$4,156.75	\$194,931.60
Total	\$8,71,879.01	\$2,016,167.47	\$1,826,439.07	\$2,671,027.48	\$1,786,312.82	\$781,919.47	9,953,745.32

Exhibit A
Ford Motor Company
Consulting Expert Privilege Log

DATE	AUTHOR	RECIPIENTS	DOCUMENT TYPE	DESCRIPTION	PRIV
10/14/04	Broby, G., ConExp.	Deutsch, B., ConExp; Grams, D. AttyO; Carpenter, K., AttyO	Memorandum	Memorandum from Ford consulting expert to Ford outside attorney, Ford in-house attorney and GM in-house attorney providing analysis and literature summary prepared at the request of counsel to assist with the defense of pending asbestos litigation; reflects the mental impressions of consulting expert.	WP; Consulting expert privilege; Joint Defense Privilege
09/17/02	Sheehan, P., ConExp.	Grams, D., AttyF; Jackson, G., AttyG; McLellan, AttyO	Memorandum	Memorandum from Ford consulting expert to Ford in-house attorney, GM in-house attorney and Ford outside attorney providing summary prepared at the request of counsel to assist with the defense of pending asbestos litigation; reflects the mental impressions of consulting expert.	WP; Consulting expert privilege; Joint Defense Privilege

Ford In-House Counsel (AttyF)
Outside Counsel (AttyO)
Consultant/Expert (ConExp)
GM In-House Counsel (AttyG)