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IN RE: ASBESTOS LITIGATION

§ IN THE DISTRICT COURTS OF
§
§ TRAVIS COUNTY, TEXAS

PLAINTIFF'S
EXHIBIT

FD-68

DEFENDANT FORD MOTOR COMPANY'S
RESPONSES TO
PLAINTIFFS' MASTER INTERROGATORIES AND
REQUESTS FOR PRODUCTION

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

SCF-FORD-3650

The manner in which Ford's attorneys assemble information pertaining to pending litigation is protected by the attorney-client privilege and work product doctrine.

These responses to these interrogatories were prepared by consulting, directly or indirectly, scores of individuals and thousands of documents prepared by perhaps hundreds of other individuals. These responses to these interrogatories constitute a corporate response which has been verified by an authorized agent of Ford. The person signing these interrogatories is an employee of Ford who is an authorized agent for the purpose of verifying discovery responses. That person works at Three Parklane Boulevard, Dearborn, Michigan 48126. For that person's name, please refer to the verification page. Ford requests that any contact be through Ford's counsel.

INTERROGATORY NO. 2:

State whether or not you are a corporation. If so, state your correct corporate name, the state of your incorporation, the address of your principal place of business, the name and address of the person or entity authorized to accept service or process on your behalf, and whether or not you have ever held a Certificate of Authority to do business in the State of Texas.

RESPONSE TO INTERROGATORY 2:

Yes, Ford is a corporation.

Ford Motor Company;

Ford was incorporated in the State of Delaware in 1919.

Ford's headquarters are at The American Road, Dearborn, Michigan 48121;

Ford was qualified to do business in Texas on May 14, 1920.

RESPONSE TO INTERROGATORY 3:

See Response to Interrogatory 4.

INTERROGATORY NO. 6:

If the answer to one or more of the last three interrogatories is in the affirmative or lists any products, state as to each named product the following:

- A. As to each product, state whether such product was mined, manufactured, marketed, and/or sold.
- B. The names of the companies mining manufacturing, marketing, and/or selling each product mined, manufactured, marketed, and/or sold.
- C. The trade or brand name of each of those products mined, manufactured, marketed and/or sold.
- D. The date each of the named products was placed on the market.
- E. A description of the physical (chemical) composition of each of the named products, including the type of asbestos contained in the product and the percentage of asbestos put in each product.
- F. The date each of the products was removed from the market, and no longer sold or distributed and the reason or reasons therefor.
- G. The date asbestos was removed from such products, if ever, and the reasons therefor.
- H. A description of the physical appearance of each of the named products.
- I. A detailed description of the intended uses of the named products.
- J. Identify the last year that you sold each asbestos-containing product.

RESPONSE TO INTERROGATORY 6:

Ford sold and continues to sell vehicles and parts, including brake linings, pads and clutch facings under names such as Ford, and Mercury, and under various lines and series names as well as names such as Motorcraft. Aftermarket parts are sold under the name of Ford or Ford Authorized Remanufacturers.

Vehicles manufactured by Ford incorporated brake friction products such as linings, which are composed, in part,

of asbestos. Ford purchases these from suppliers. Ford understands the type of asbestos fibers in these to be chrysotile. Because Ford does not manufacture these, it does not know percentages of asbestos that they contain, but, generally, it is thought to be, for example, between 40% and 60% asbestos, by weight, in brake linings.

These linings and pads assist in braking through transmitting rotational force from the engine and fly-wheel to the rear wheels.

Not applicable.

INTERROGATORY NO. 7:

Do any documents, including but not limited to written memoranda, specifications, recommendations, blueprints, or other written materials of any kind or character, relating to the design, preparation, or introduction into the market of the products listed in Interrogatory No. 6 still exist? If so, state:

A. A description of each such document.

B. The name, address, and job title of each person who currently has possession of each document, and where the documents are currently located.

RESPONSE TO INTERROGATORY 7:

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

INTERROGATORY NO. 8:

Before distributing, selling, or placing the products listed in your responses to Interrogatory Nos. 3-6 into the streams of commerce, were any tests conducted to determine potential health hazards involved in the use of, or exposure to, the materials such as asbestos, contained in those products? If the answer is affirmative, state:

A. The names of the products tested and the date of each test.

THIS BRAKE LINING OR ANY COMPONENT RELATED TO IT OR LOCATED NEAR IT, PREVENT ASBESTOS DUST FROM BEING AIRBORNE BY VACUUMING THIS ASSEMBLY WITH AN INDUSTRIAL TYPE VACUUM CLEANER EQUIPPED WITH A HIGH EFFICIENCY FILTER SYSTEM AND BY WASHING THE ASSEMBLY WITH AN APPROPRIATE BRAKE PARTS WASHER IF NECESSARY. NEVER REMOVE DUST OR DIRT FROM THIS ASSEMBLY BY BLOWING WITH COMPRESSED AIR.

INTERROGATORY No. 51:

Did your company or its predecessor(s) or subsidiaries ever stamp or place the name of the company its initials, or any identifying logo on any of its asbestos-containing products? If so, please state the name brand names of such products, a description of such stamp or logo and the dates such were placed on the referred products.

RESPONSE TO INTERROGATORY 51:

Ford vehicles would carry the Ford logo.

INTERROGATORY NO. 52:

Has your company, or your predecessor(s) or subsidiaries, ever devised a research plan to develop, or actually developed or had developed, a product which did not contain asbestos and which could be substituted for one or more of your asbestos-containing products? If so, state the date that such research plan was begun and when such asbestos-free product was first placed on the market.

RESPONSE TO INTERROGATORY 52:

The first Ford production application of non-asbestos brakes was on light trucks in approximately 1976. Other Ford vehicles presently utilize other non-asbestos materials and semi-metallic materials.

INTERROGATORY NO. 53:

Did your company or its predecessor(s) or subsidiaries ever recall any products containing asbestos from the market or stream of commerce? If so, state:

- A. All details of such recall;
- B. The name of the product recalled, including the reason for the recall and the names and current addresses of those individuals who determined that it should take place;

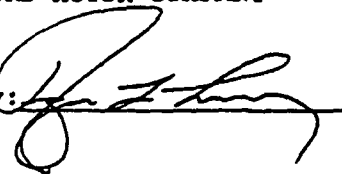
STATE OF MICHIGAN)

) SS.

COUNTY OF WAYNE)

ROGER L MAY, being duly sworn, deposes and says that he is an authorized agent of Ford Motor Company and that he verifies the foregoing DEFENDANT FORD MOTOR COMPANY'S RESPONSES TO PLAINTIFFS' MASTER INTERROGATORIES AND REQUESTS FOR PRODUCTION 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 2nd day of June 1995.

Donna J. Seibert
Notary Public

Wayne County, Michigan

My Commission Expires: 11-4-98

ALC/18260/9999/CZ3/2 DONNA J. SEIBERT
Notary Public, Wayne County, Michigan
My Commission Expires November 4, 1998