

This abusive request is extraordinarily broad and burdensome, and it would create an undue burden and great expense on Ford to respond.

Additionally, this interrogatory seeks information that may be protected by federal privacy legislation and may also constitute privileged doctor-patient communications and confidential employee information.

INTERROGATORY NO. 91

Identify any and all material safety data sheets concerning the products listed in response to Interrogatory No. 69 prepared, at any time, by, or on behalf of, you and/or any predecessor related entity.

ANSWER:

As mentioned in Ford's Preliminary Statement, Ford will make available for inspection at a mutually agreeable time at Ford's counsel's office in Illinois, a collection of non-privileged documents and other materials pertaining to asbestos-containing friction products, which may contain information responsive to this interrogatory.

Ford otherwise objects to this interrogatory because it is overly broad, unduly burdensome, and seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. This interrogatory is not limited to a reasonable time frame, geographic location, or scope, and instead it literally seeks information relating to all asbestos-containing friction vehicle products of any type that were ever sold or distributed by Ford at any time during its corporate history, and without any limitation to those time frames or products to which plaintiffs were allegedly exposed.

INTERROGATORY NO. 92

Identify any and all trade organizations, associations, or other entities, including but not limited to American Textile Institute (ATI), Asbestos Information Association (AIA), Industrial