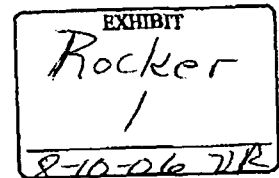


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SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

IN RE: NEW YORK CITY ASBESTOS LITIGATION

ALL WEITZ & LUXENBERG CASES V. FORD MOTOR COMPANY



NOTICE TO TAKE
DEPOSITION UPON
ORAL EXAMINATION

Index No: 40,000/88

PLEASE TAKE NOTICE, that pursuant to the New York Asbestos Litigation Case Management Order and Article 31 of the Civil Practice Law and Rules, that plaintiff(s), by their attorneys, WEITZ & LUXENBERG, P.C., will take the deposition of the person(s) designated by, FORD MOTOR COMPANY as most knowledgeable with respect to those areas set forth in "EXHIBIT A", annexed hereto and made a part hereof by reference.

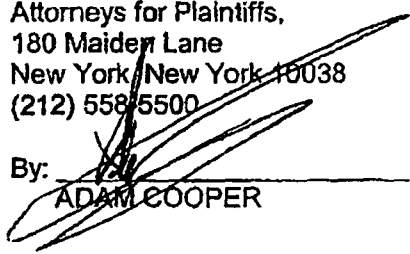
The deposition(s) will commence on the 12TH day of JULY, 2006 at 10:00 a.m. and continuing day-to-day until completion, at the offices of WEITZ & LUXENBERG, P.C., located at 180 Maiden Lane, 17th Floor, New York, New York. At such date and time, WEITZ & LUXENBERG, P.C. will conduct an examination and the testimony will be recorded by stenographically recording and by videotape.

PLEASE TAKE FURTHER NOTICE, that the person(s) to be examined is required to bring with him/her those documents referenced in "EXHIBIT B".

This deposition will be held before an officer duly authorized to administer oaths at which time and place you are invited to attend and cross-examine.

Dated: New York, New York
June 7, 2006

WEITZ & LUXENBERG, P.C.
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By: 
ADAM COOPER

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