

IN THE CIRCUIT COURT OF JACKSON COUNTY, MISSOURI
AT INDEPENDENCE

PRISCILLA R. DIETIKER, et al ,

Plaintiffs,

Case No. 03 CV 218799
Division 17

v

FORD MOTOR COMPANY, et al.,

Defendants.

**FORD MOTOR COMPANY'S RESPONSES TO
PLAINTIFFS' REQUESTS FOR ADMISSION**

Ford Motor Company ("Ford") herein responds to Plaintiffs' Requests for Admission as follows

GENERAL OBJECTIONS

Ford's responses to plaintiffs' requests for admission have been prepared in full compliance with the Missouri Rules of Civil Procedure, pursuant to a reasonable inquiry for information properly requested. These responses are based upon facts known or believed by Ford at the time of answering these requests. Ford notes that, although it has made a good faith effort to respond to these requests, Ford's investigation and discovery regarding these matters is ongoing. Accordingly, Ford's responses are based on information currently available.

Ford objects to plaintiffs' definitions to the extent they purport to require Ford to take action or provide information beyond the requirements of the Missouri Rules of Civil Procedure. In addition, to the extent plaintiffs ascribe special meanings or definitions to words used in this set of discovery, Ford objects to the specialized meanings and definitions and interprets all words contained in this set of discovery in accordance with their ordinary and customary meanings.

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Ford also objects to these requests as overly broad and unduly burdensome to the extent they seek admissions regarding documents and information that is neither relevant to the issues in this lawsuit, nor reasonably calculated to lead to the discovery of admissible evidence.

Ford further objects to these requests as beyond the scope of any agreement reached or contemplated by the parties.

Additionally, Ford objects to these requests to the extent that plaintiffs attempt to use these requests beyond the scope of this litigation, and Ford specifically limits its answers to these requests and to this litigation.

Ford's admissions, if any, as set forth herein are limited to the knowledge and information currently available or believed by Ford. Ford reserves its right to amend or revise any response set forth herein to the extent that Ford becomes aware of information to suggest that any prior admission should be denied.

The objections set forth above are hereby incorporated into all of the subsequent responses as if fully set forth in each particular request response.

RESPONSES TO INDIVIDUAL DISCOVERY REQUESTS

A. ACCURACY OF EXHIBITS

For the Exhibits identified in Attachment A, admit that each Exhibit is a true and accurate copy of the Document(s) found in your records and files.

RESPONSE:

Ford objects to this request as overly broad and unduly burdensome in that it requires Ford to compare each and every document plaintiffs provided to the document in Ford's files. Ford also objects to this request because some of the documents that plaintiffs provided are incomplete, do not match the document boundaries that Ford believes are accurate, and do not

show a Ford Bates number because they have either been removed or covered up by plaintiffs' exhibit stickers

Without waiving any objection, Ford admits only that the documents produced by Ford in connection with this litigation are true and accurate copies of the documents found in its records or files. Ford denies any remaining part of this request as untrue.

B SPECIFIC REQUESTS

For the following specific documents, Plaintiff asks Defendant to admit or deny the following statements:

REQUEST NO. 1:

Admit that Exhibit 1800 is an ancient document.

RESPONSE.

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 2:

Admit that Exhibit 1800 is a learned treatise

RESPONSE.

With the exception of the exhibit sticker, Ford admits that Exhibit No. 1800, Bates stamped number 8004 0086-0086, is a learned treatise.

REQUEST NO. 3:

Admit that Exhibit 1801 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 4:

Admit that Exhibit 1801 is a learned treatise.

RESPONSE:

With the exception of the exhibit sticker, Ford admits that Exhibit No. 1801, Bates stamped number 8004 0087-0087, is a learned treatise.

REQUEST NO. 5:

Admit that Exhibit 1802 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 6:

Admit that Exhibit 1802 is a learned treatise.

RESPONSE:

After a reasonable inquiry, the information known or readily obtainable to Ford is insufficient to enable Ford to either admit or deny this request. Ford can neither admit nor deny this request as written because Exhibit 1802, Bates stamped number 8004 0090-0090, is incomplete.

REQUEST NO. 7:

Admit that Exhibit 1803 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 8:

Admit that Exhibit 1803 is a learned treatise.

RESPONSE:

After a reasonable inquiry, the information known or readily obtainable to Ford is insufficient to enable Ford to either admit or deny this request. Ford can neither admit nor deny this request as written because Exhibit 1803, Bates stamped number 8004 0045-0045, is incomplete.

REQUEST NO. 9:

Admit that Exhibit 1804 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 10:

Admit that Exhibit 1804 is a learned treatise.

RESPONSE:

Ford denies this request as untrue.

REQUEST NO. 11:

Admit that Exhibit 1804 is a public record.

RESPONSE:

Ford objects to this request because it seeks information that is available in the public domain. Ford also objects to this request because it requires Ford to conduct a search of information outside of its possession, custody and control to adequately respond. Accordingly, Ford is without current knowledge or information sufficient to admit or deny this request.

REQUEST NO. 12:

Admit that Exhibit 1805 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 13:

Admit that Exhibit 1805 is a learned treatise.

RESPONSE:

After a reasonable inquiry, the information known or readily obtainable to Ford is insufficient to enable Ford to either admit or deny this request. Ford can neither admit nor deny this request as written because Exhibit 1805, Bates stamped number 8004 0040-0040, is incomplete

REQUEST NO. 14:

Admit that Exhibit 1806 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 15:

Admit that Exhibit 1806 is a learned treatise.

RESPONSE:

After a reasonable inquiry, the information known or readily obtainable to Ford is insufficient to enable Ford to either admit or deny this request. Ford can neither admit nor deny this request as written because Exhibit 1806 Bates stamped number 8004 0104-0104, is incomplete.

REQUEST NO. 16:

Admit that Exhibit 1807 is an ancient document

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written

REQUEST NO. 17:

Admit that Exhibit 1807 is a learned treatise.

RESPONSE:

After a reasonable inquiry, the information known or readily obtainable to Ford is insufficient to enable Ford to either admit or deny this request. Ford can neither admit nor deny this request as written because Exhibit 1807, Bates stamped number 8004 0041-0041, is incomplete

REQUEST NO. 18:

Admit that Exhibit 1808 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 19:

Admit that Exhibit 1808 is a learned treatise.

RESPONSE:

Ford denies this request as untrue.

REQUEST NO. 20:

Admit that Exhibit 1809 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 21:

Admit that Exhibit 1809 is a learned treatise.

RESPONSE:

After a reasonable inquiry, the information known or readily obtainable to Ford is insufficient to enable Ford to either admit or deny this request. Ford can neither admit nor deny this request as written because Exhibit 1809 Bates stamped number 8004 0076-0076, is incomplete.

REQUEST NO. 22:

Admit that Exhibit 1810 is an ancient document

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written

REQUEST NO. 23:

Admit that Exhibit 1810 is a business record.

RESPONSE:

Ford denies this request as untrue

REQUEST NO. 24:

Admit that Exhibit 1810 is a list of component parts containing asbestos which were incorporated into your vehicles as of October 1, 1958.

RESPONSE:

Ford denies this request as untrue.

REQUEST NO. 25

Admit that Exhibit 1811 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 26

Admit that Exhibit 1811 is a business record.

RESPONSE:

With the exception of the exhibit sticker that is not present on the original document and the handwritten marginalia, Ford admits only that Exhibit No. 1811, Bates stamped numbers 8003 0537-0540, consists of excerpts from the 1959 Car Shop Manual, and that the manual, in its entirety, appears to be a record of Ford's regularly conducted business activity. Ford denies any remaining part of this request as untrue.

REQUEST NO. 27

Admit that Exhibit 1811 is the brake adjustment section of the 1959 Ford car, Courier and Ranchero service manual.

RESPONSE:

Ford denies this request as untrue

REQUEST NO. 28

Admit that Exhibit 1812 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 29

Admit that Exhibit 1812 is a business record.

RESPONSE:

With the exception of the exhibit sticker that is not present on the original document and the handwritten marginalia, Ford admits only that Exhibit No. 1812, Bates stamped numbers 8003 0549-0550, consists of excerpts from the 1960 Ford Falcon Shop Manual and that the

manual, in its entirety, appears to be a record of Ford's regularly conducted business activity. Ford denies any remaining part of this request as untrue.

REQUEST NO. 30

Admit that Exhibit 1812 is the brake drum and brake assembly repair section of the 1960 Ford Falcon shop manual.

RESPONSE:

With the exception of the exhibit sticker that is not present on the original document and the handwritten marginalia, Ford admits only that Exhibit No. 1812, Bates stamped numbers 8003 0549-0550, consists of excerpts from a section of the 1960 Ford Falcon Shop Manual entitled "Brake Drum and Brake Assembly Repair." Ford denies any remaining part of this request as untrue.

REQUEST NO. 31

Admit that Exhibit 1813 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 32

Admit that Exhibit 1813 is a business record.

RESPONSE:

With the exception of the exhibit sticker that is not present on the original document and the handwritten marginalia, Ford admits only that Exhibit No. 1813, Bates stamped numbers 8003 0563-0565, consists of excerpts from the 1960 Comet Maintenance Manual and that the

manual, in its entirety, appears to be a record of Ford's regularly conducted business activity. Ford denies any remaining part of this request as untrue.

REQUEST NO. 33

Admit that Exhibit 1813 is the brake system section of the 1960 Comet Maintenance Manual.

RESPONSE:

With the exception of the exhibit sticker that is not present on the original document and the handwritten marginalia, Ford admits only that Exhibit No. 1813, Bates stamped numbers 8003 0563-0565, consists of excerpts from a portion of the 1960 Comet Maintenance Manual entitled "Brake Section " Ford denies any remaining part of this request as untrue.

REQUEST NO. 34

Admit that Exhibit 1814 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 35

Admit that Exhibit 1814 is a learned treatise.

RESPONSE:

After a reasonable inquiry, the information known or readily obtainable to Ford is insufficient to enable Ford to either admit or deny this request. Ford can neither admit nor deny this request as written because Exhibit 1814, Bates stamped number 8004 0105-0106, is incomplete.

REQUEST NO. 36

Admit that Exhibit 1815 is an ancient document

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written

REQUEST NO. 37

Admit that Exhibit 1815 is the hydraulic brakes section of the 1961 Ford Falcon manual.

RESPONSE:

With the exception of the exhibit sticker that is not present on the original document and the handwritten marginalia, Ford admits only that Exhibit No. 1815, Bates stamped numbers 8003 0572-0573, consists of excerpts from a portion of the 1961 Ford Falcon Shop Manual entitled "Hydraulic Brakes." Ford denies any remaining part of this request as untrue.

REQUEST NO. 38

Admit that Exhibit 1816 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 39

Admit that Exhibit 1816 is a business record.

RESPONSE:

With the exception of the exhibit sticker that is not present on the original document and the handwritten marginalia, Ford admits only that Exhibit No. 1816, Bates stamped numbers 8003 0578-0581, consists of excerpts from the 1961 Ford Car Shop Manual and that the manual, in its entirety, appears to be a record of Ford's regularly conducted business activity. Ford denies any remaining part of this request as untrue.

REQUEST NO. 40

Admit that Exhibit 1816 is the hydraulic and parking brake section of the 1961 Ford Car Shop Manual.

RESPONSE:

With the exception of the exhibit sticker that is not present on the original document and the handwritten marginalia, Ford admits only that Exhibit No. 1816, Bates stamped numbers 8003 0578-0581, consists of excerpts from a portion of the 1961 Ford Car Shop Manual entitled "Hydraulic and Parking Brakes." Ford denies any remaining part of this request as untrue.

REQUEST NO. 41

Admit that Exhibit 1817 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 42

Admit that Exhibit 1817 is a business record.

RESPONSE:

With the exception of the exhibit sticker that is not present on the original document and the handwritten marginalia, Ford admits only that Exhibit No 1817, Bates stamped numbers 8003 0582-0584, consists of excerpts from the 1961 Comet Maintenance Manual and that the manual, in its entirety, appears to be a record of Ford's regularly conducted business activity. Ford denies any remaining part of this request as untrue.

REQUEST NO. 43

Admit that Exhibit 1817 is the brake system section of the 1961 Ford Comet manual.

RESPONSE:

With the exception of the exhibit sticker that is not present on the original document and the handwritten marginalia, Ford admits only that Exhibit No. 1817, Bates stamped numbers 8003 0582-0584, consists of excerpts from a portion of the 1961 Comet Maintenance Manual entitled "Brake Systems " Ford denies any remaining part of this request as untrue.

REQUEST NO. 44

Admit that Exhibit 1818 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 45

Admit that Exhibit 1818 is a business record.

RESPONSE:

Ford denies this request as untrue.

REQUEST NO. 46

Admit that you subscribed to the magazine Automotive Industries in August, 1961.

RESPONSE:

Ford objects to this request as overly broad and unduly burdensome because it would require Ford to poll each and every current and/or past employee to obtain the answer to this request. Moreover, this information is neither relevant to the issues in this lawsuit, nor reasonably calculated to lead to the discovery of admissible evidence.

REQUEST NO. 47

Admit that Exhibit 1819 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written

REQUEST NO. 48

Admit that Exhibit 1819 is a business record.

RESPONSE:

With the exception of the exhibit sticker that is not present on the original document and the handwritten marginalia, Ford admits only that Exhibit No. 1819, Bates stamped numbers 8003 0594-0598, consists of excerpts from the Mercury Meteor 1962 Maintenance Manual and that the manual, in its entirety, appears to be a record of Ford's regularly conducted business activity. Ford denies any remaining part of this request as untrue.

REQUEST NO. 49

Admit that Exhibit 1819 is the brake drum section of the 1962 Mercury Meteor Maintenance Manual.

RESPONSE:

With the exception of the exhibit sticker that is not present on the original document and the handwritten marginalia, Ford admits only that Exhibit No. 1819, Bates stamped numbers 8003 0594-0598, consists of excerpts from a portion of the Mercury Meteor 1962 Maintenance Manual entitled "Brake Systems." Ford denies any remaining part of this request as untrue

REQUEST NO. 50

Admit that Exhibit 1820 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 51

Admit that Exhibit 1820 is a business record.

RESPONSE:

With the exception of the exhibit sticker that is not present on the original document, Ford admits that the document identified by plaintiffs as Exhibit No. 1820, Bates stamped numbers 8002 1181-1882, appears to be a record of Ford's regularly conducted business activity.

REQUEST NO. 52

Admit that Exhibit 1821 is an ancient document

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 53

Admit that Exhibit 1821 is a business record.

RESPONSE:

With the exception of the exhibit sticker that is not present on the original document, Ford admits that the document identified by plaintiffs as Exhibit No. 1821, Bates stamped numbers 8003 0459-0466, appears to be a record of Ford's regularly conducted business activity.

REQUEST NO. 54

Admit that Exhibit 1822 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 55

Admit that Exhibit 1822 is a business record.

RESPONSE:

With the exception of the exhibit sticker that is not present on the original document, Ford admits that the document identified by plaintiffs as Exhibit No. 1822, Bates stamped numbers 8003 0449-0458, appears to be a record of Ford's regularly conducted business activity.

REQUEST NO. 56

Admit that Exhibit 1823 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written

REQUEST NO. 57

Admit that Exhibit 1823 is a business record.

RESPONSE:

With the exception of the exhibit sticker that is not present on the original document, Ford admits that the document identified by plaintiffs as Exhibit No. 1823, Bates stamped number 8002 1687-1687, appears to be a record of Ford's regularly conducted business activity.

REQUEST NO. 58

Admit that Exhibit 1824 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written

REQUEST NO. 59

Admit that Exhibit 1824 is a business record.

RESPONSE:

With the exception of the exhibit sticker that is not present on the original document, Ford admits that the document identified by plaintiffs as Exhibit No. 1824, Bates stamped numbers 8002 1688-1692, appears to be a record of Ford's regularly conducted business activity.

REQUEST NO. 60

Admit that Exhibit 1825 is an ancient document

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 61

Admit that Exhibit 1825 is a business record.

RESPONSE:

With the exception of the exhibit sticker that is not present on the original document, Ford admits only that Exhibit No. 1825, Bates stamped number 8003 0440-0440, consists of one page of an incomplete document that would, in its entirety, appear to be a record of Ford's regularly conducted business activity. With respect to Exhibit No. 1825, Bates stamped numbers 8003 0441-0448, Ford admits that it appears to be a record of Ford's regularly conducted business activity. Ford denies any remaining part of this request as untrue.

REQUEST NO. 62

Admit that Exhibit 1826 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 63

Admit that Exhibit 1826 is a learned treatise.

RESPONSE:

With the exception of the exhibit sticker, Ford admits that Exhibit No. 1826, Bates stamped numbers 8006 1372-1376, is a learned treatise.

REQUEST NO. 64

Admit that Exhibit 1827 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 65

Admit that Exhibit 1827 is a business record

RESPONSE:

With the exception of the exhibit sticker that is not present on the original document, Ford admits that the document identified by plaintiffs as Exhibit No. 1827, Bates stamped numbers 8000 1702-1703, appears to be a record of Ford's regularly conducted business activity.

REQUEST NO. 66

Admit that Exhibit 1828 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 67

Admit that Exhibit 1828 is a business record.

RESPONSE:

With the exception of the exhibit sticker that is not present on the original document, Ford admits that the document identified by plaintiffs as Exhibit No. 1828, Bates stamped numbers 8000 1677-1678, appears to be a record of Ford's regularly conducted business activity.

REQUEST NO. 68

Admit that Exhibit 1829 is an ancient document

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 69

Admit that Exhibit 1829 is a business record

RESPONSE:

With the exception of the exhibit sticker that is not present on the original document, Ford admits that the document identified by plaintiffs as Exhibit No. 1829, Bates stamped number 8003 0206-0207 only, appears to be a record of Ford's regularly conducted business activity. After a reasonable inquiry, the information known or readily obtainable to Ford is insufficient to enable Ford to either admit or deny this request with respect to Exhibit No. 1829, Bates stamped numbers 8003 0208-0210.

REQUEST NO. 70

Admit that Exhibit 1830 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 71

Admit that Exhibit 1832 business record

RESPONSE:

Ford objects to this request as overly broad, unduly burdensome and neither relevant to the issues in this lawsuit nor reasonably calculated to lead to the discovery of admissible evidence. Further, based on the limited information contained in this document, Ford can neither admit nor deny this request as written

REQUEST NO. 72

Admit that Exhibit 1831 is an ancient document

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 73

Admit that Exhibit 1831 is a business record.

RESPONSE:

With the exception of the exhibit sticker that is not present on the original document, Ford admits that the document identified by plaintiffs as Exhibit No. 1831, Bates stamped numbers 8003 0166-0167, appears to be a record of Ford's regularly conducted business activity.

REQUEST NO. 74

Admit that Exhibit 1832 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 75

Admit that Exhibit 1832 is a business record

RESPONSE:

Ford objects to this request as duplicative of Request No. 71. Ford refers plaintiffs, to and incorporates by reference herein, its response to Request No. 71

REQUEST NO. 76

Admit that the articles listed in Exhibit 1832 were in the Ford Motor Company engineering and research library as of November 1965.

RESPONSE:

Ford objects to this request 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.

REQUEST NO. 77

Admit that Exhibit 1833 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 78

Admit that Exhibit 1833 is a learned treatise.

RESPONSE:

After a reasonable inquiry, the information known or readily obtainable to Ford is insufficient to enable Ford to either admit or deny this request. Ford can neither admit nor deny this request as written because Exhibit 1833, Bates stamped numbers 8000 0935-0938, is incomplete.

REQUEST NO. 79

Admit that Exhibit 1834 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 80

Admit that Exhibit 1834 is a learned treatise

RESPONSE:

After a reasonable inquiry, the information known or readily obtainable to Ford is insufficient to enable Ford to either admit or deny this request. Ford can neither admit nor deny this request as written because Exhibit 1834, Bates stamped numbers 8004 1028-1036, appears to be incomplete and/or contains pages that do not appear to relate to each other.

REQUEST NO. 81

Admit that Exhibit 1835 is an ancient document

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written

REQUEST NO. 82

Admit that Exhibit 1835 is a business record.

RESPONSE:

After a reasonable inquiry, the information known or readily obtainable to Ford is insufficient to enable Ford to either admit or deny this request

REQUEST NO. 83

Admit that Exhibit 1835 was authored by Roy L. Gealer.

RESPONSE:

Ford objects to this request because it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Ford also objects to this request because, after a reasonable inquiry, the information known or readily obtainable to Ford is insufficient to enable Ford to either admit or deny this request.

REQUEST NO. 84

Admit that Roy L. Gealer was employed by you at the time that he wrote Exhibit 1835.

RESPONSE:

After a reasonable inquiry, the information known or readily obtainable to Ford is insufficient to enable Ford to either admit or deny this request. Ford otherwise objects to this request as vague and ambiguous. Ford also objects to this request to the extent it is based on unsupported assumptions of fact.

REQUEST NO. 85

Admit that Exhibit 1836 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 86

Admit that Exhibit 1836 is a business record.

RESPONSE:

With the exception of the exhibit sticker that is not present on the original document and the handwritten marginalia, Ford admits only that Exhibit No. 1836, Bates stamped numbers 8003 0667-0681, consists of excerpts from the 1966 Ford Truck Shop Manual Volume 1 and that the manual, in its entirety, appears to be a record of Ford's regularly conducted business activity. Ford denies any remaining part of this request as untrue.

REQUEST NO. 87

Admit that Exhibit 1836 is the brake section of the 1966 Ford Truck manual.

RESPONSE:

With the exception of the exhibit sticker that is not present on the original document and the handwritten marginalia, Ford admits only that Exhibit No. 1836, Bates stamped numbers 8003 0667-0671, consists of excerpts from a portion of the 1966 Ford Truck Shop Manual Volume 1 entitled "General Brake Service" and that Exhibit No. 1836, Bates stamped numbers 8003 0672-0681, consists of excerpts from a portion of the 1966 Ford Truck Shop Manual Volume 1 entitled "Hydraulic Brakes " Ford denies any remaining part of this request as untrue.

REQUEST NO. 88

Admit that Exhibit 1837 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 89

Admit that Exhibit 1837 is a business record.

RESPONSE:

With the exception of the exhibit sticker that is not present on the original document, Ford admits that the document identified by plaintiffs as Exhibit No. 1837, Bates stamped numbers 8003 0087-0088, appears to be a record of Ford's regularly conducted business activity.

REQUEST NO. 90

Admit that Exhibit 1838 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 91

Admit that Exhibit 1838 is a business record.

RESPONSE:

Ford denies this request as untrue

REQUEST NO. 92

Admit that Exhibit 1838 is a learned treatise.

RESPONSE:

Ford denies this request as untrue.

REQUEST NO. 93

Admit that in 1966, Ford Motor Company was a member of the Industrial Hygiene Foundation of America, Inc.

RESPONSE:

Based on information currently known to Ford, Ford admits that it was a member of the Industrial Hygiene Foundation in 1966.

REQUEST NO. 94

Admit that Exhibit 1839 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 95

Admit that Exhibit 1839 is a business record.

RESPONSE:

With the exception of the exhibit sticker that is not present on the original document and the handwritten marginalia, Ford admits only that Exhibit No. 1839, Bates stamped numbers 8003 0174-0178, consists of excerpts from what may be a record of Ford's regularly conducted business activity. After a reasonable inquiry, the information known or readily obtainable to Ford is insufficient to enable Ford to either admit or deny any remaining part of this request.

REQUEST NO. 96

And at that Exhibit 1840 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 97

Admit that Exhibit 1840 is a business record

RESPONSE:

With the exception of the exhibit sticker that is not present on the original document, Ford admits only that Exhibit No. 1840, Bates stamped numbers 8003 0183-0186, consists of excerpts only from what may be a record of Ford's regularly conducted business activity. After a reasonable inquiry, the information known or readily obtainable to Ford is insufficient to enable Ford to either admit or deny any remaining part of this request.

REQUEST NO. 98

Admit that Exhibit 1841 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 99

Admit that Exhibit 1841 is a business record.

RESPONSE:

After a reasonable inquiry, the information known or readily obtainable to Ford is insufficient to enable Ford to either admit or deny this request.

REQUEST NO. 100

Admit that Exhibit 1841 is the Major Repair Operations section of the 1967 Cougar, Fairlane, Falcon, Mercury, Mustang Intermediate manual.

RESPONSE:

After a reasonable inquiry, the information known or readily obtainable to Ford is insufficient to enable Ford to either admit or deny this request.

REQUEST NO. 101

Admit that Exhibit 1842 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 102

Admit that Exhibit 1842 is a learned treatise.

RESPONSE:

After a reasonable inquiry, the information known or readily obtainable to Ford is insufficient to enable Ford to either admit or deny this request. Ford can neither admit nor deny this request as written because Exhibit 1842, Bates stamped number 8004 0038-0038, is incomplete.

REQUEST NO. 103

Admit that Exhibit 1843 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written

REQUEST NO. 104

Admit that Exhibit 1843 is a business record.

RESPONSE:

With the exception of the exhibit sticker that is not present on the original document, Ford admits that the document identified by plaintiffs as Exhibit No. 1843, Bates stamped numbers 8003 0191-0192, appears to be a record of Ford's regularly conducted business activity.

REQUEST NO. 105

Admit that Exhibit 1844 is an ancient document

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 106

Admit that Exhibit 1844 is a business record.

RESPONSE:

With the exception of the exhibit sticker that is not present on the original document, Ford admits that the document identified by plaintiffs as Exhibit No. 1844, Bates stamped numbers 8006 1912-1916, appears to be a record of Ford's regularly conducted business activity

REQUEST NO. 107

Admit that Exhibit 1845 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 108

Admit that Exhibit 1845 is a learned treatise.

RESPONSE:

Ford denies this request as untrue.

REQUEST NO. 109

Admit that Exhibit 1846 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 110

Admit that Exhibit 1846 is a learned treatise.

RESPONSE:

After a reasonable inquiry, the information known or readily obtainable to Ford is insufficient to enable Ford to either admit or deny this request. Ford can neither admit nor deny this request as written because Exhibit 1846, Bates stamped number 8004 0048-0048, is incomplete.

REQUEST NO. 111

Admit that Exhibit 1847 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 112

Admit that Exhibit 1847 is a business record.

RESPONSE:

Ford denies this request as untrue.

REQUEST NO. 113

Admit that you received Exhibit 1847 on or about October 12, 1968.

RESPONSE:

After a reasonable inquiry, the information known or readily obtainable to Ford is insufficient to enable Ford to either admit or deny this request.

REQUEST NO. 114

Admit that Exhibit 1848 is in a document.

RESPONSE:

Ford objects to this request as vague, ambiguous and nonsensical.

REQUEST NO. 115

Admit that Exhibit 1848 is a business record.

RESPONSE:

With the exception of the exhibit sticker that is not present on the original document, Ford admits that the document identified by plaintiffs as Exhibit No. 1848, Bates stamped

numbers 8006 0732-0762 only, appears to be a record of Ford's regularly conducted business activity. Ford denies this request as untrue with respect to Exhibit No. 1848, Bates stamped number 8006 0733-0733.

REQUEST NO. 116

Admit that in 1969, Dr. D.E. Hickish and Mr. K. L. Knight were employed by Ford of Britain in its Industrial Hygiene Unit.

RESPONSE:

Ford denies this request as untrue as written and refers plaintiffs to its response to Request No. 128 herein.

REQUEST NO. 117

Admit that Exhibit 1849 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written

REQUEST NO. 118

Admit that Exhibit 1849 is a business record.

RESPONSE:

With the exception of the exhibit sticker that is not present on the original document and the handwritten marginalia, Ford admits only that Exhibit No. 1849, Bates stamped number 8003 0698-0698, consists of an excerpt from the 1968 Bronco 1969 Econoline and Clubwagon Shop Manual and that the manual, in its entirety, appears to be a record of Ford's regularly conducted business activity. Ford denies any remaining part of this request as untrue.

REQUEST NO. 119

Admit that Exhibit 1849 is the Major Repair Operations section of the 1968 to 1969 Ford Bronco and Econoline maintenance manual.

RESPONSE:

With the exception of the exhibit sticker that is not present on the original document and the handwritten marginalia, Ford admits only that Exhibit No. 1849, Bates stamped number 8003 0698-0698, consists of an excerpt from a portion of the 1968 Bronco 1969 Econoline and Clubwagon Shop Manual entitled "Brake Systems." Ford denies any remaining part of this request as untrue.

REQUEST NO. 120

Admit that Exhibit 1850 is an ancient document

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 121

Admit that Exhibit 1850 is a business record.

RESPONSE:

With the exception of the exhibit sticker that is not present on the original document and the handwritten marginalia, Ford admits only that Exhibit No. 1850, Bates stamped numbers 8003 0637-0638, consists of excerpts from the 1969 Car Shop Manual Volume 1 Chassis and that the manual, in its entirety, appears to be a record of Ford's regularly conducted business activity. Ford denies any remaining part of this request as untrue.

REQUEST NO. 122

Admit that Exhibit 1850 is the brake section of the 1969 Ford Car maintenance manual.

RESPONSE:

With the exception of the exhibit sticker that is not present on the original document and the handwritten marginalia, Ford admits only that Exhibit No. 1850, Bates stamped numbers 8003 0637-0638, consists of excerpts from a portion of the 1969 Car Shop Manual Volume 1 Chassis entitled "General Brake Service." Ford denies any remaining part of this request as untrue.

REQUEST NO. 123

Admit that Exhibit 1851 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 124

Admit that Exhibit 1851 is a business record.

RESPONSE:

Ford denies this request as untrue.

REQUEST NO. 125

Admit that Exhibit 1851 is a learned treatise.

RESPONSE:

With the exception of the exhibit sticker, Ford admits that Exhibit No 1851, Bates stamped numbers 8000 0928-0934, is a learned treatise.

REQUEST NO. 126

Admit that Exhibit 1852 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written

REQUEST NO. 127

Admit that Exhibit 1852 is a learned treatise.

RESPONSE:

With the exception of the exhibit sticker, Ford admits that Exhibit No. 1852, Bates stamped numbers 8004 0647-0653, is a learned treatise

REQUEST NO. 128

Admit that in 1970, D.E. Hickish and K. L. Knight were employed by Medical Services of Ford of Britain

RESPONSE:

Based on information currently known to Ford, Ford admits this request.

REQUEST NO. 129

Admit that Exhibit 1853 is a business record.

RESPONSE:

With the exception of the exhibit sticker that is not present on the original document, Ford admits that the document identified by plaintiffs as Exhibit No 1853, Bates stamped numbers 8000 0749-0799, appears to be a record of Ford's regularly conducted business activity

REQUEST NO. 130

Admit that Exhibit 1853 is a listing of documents found within the records and files of Ford Motor Company dealing with asbestos.

RESPONSE:

After a reasonable inquiry, the information known or readily obtainable to Ford is insufficient to enable Ford to either admit or deny this request. Ford otherwise objects to this request because it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

REQUEST NO. 131

Admit that Exhibit 1854 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 132

Admit that Exhibit 1854 is a business record.

RESPONSE:

With the exception of the exhibit sticker that is not present on the original document, Ford admits that the document identified by plaintiffs as Exhibit No. 1854, Bates stamped number 8000 0061-0061, appears to be a record of Ford's regularly conducted business activity.

REQUEST NO. 133

Admit that Exhibit 1855 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 134

Admit that Exhibit 1855 is a business record.

RESPONSE:

With the exception of the exhibit sticker that is not present on the original document, Ford admits that the document identified by plaintiffs as Exhibit No. 1855, Bates stamped number 8000 0032-0032, appears to be a record of Ford's regularly conducted business activity.

REQUEST NO. 135

Admit that Exhibit 1856 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 136

Admit that Exhibit 1856 is a business record.

RESPONSE:

With the exception of the exhibit sticker that is not present on the original document, Ford admits that the document identified by plaintiffs as Exhibit No. 1856, Bates stamped numbers 8000 0199-0202, appears to be a record of Ford's regularly conducted business activity.

REQUEST NO. 137

Admit that Exhibit 1857 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 138

Admit that Exhibit 1857 is a business record.

RESPONSE:

Ford denies this request as untrue.

REQUEST NO. 139

Admit that Exhibit 1857 is a public record.

RESPONSE:

Ford objects to this request because it seeks information that is available in the public domain. Ford also objects to this request because it requires Ford to conduct a search of information outside of its possession, custody and control to adequately respond. Accordingly, Ford is without current knowledge or information sufficient to admit or deny this request.

REQUEST NO. 140

Admit that Exhibit 1858 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 141

Admit that Exhibit 1858 is a business record

RESPONSE:

After a reasonable inquiry, the information known or readily obtainable to Ford is insufficient to enable Ford to either admit or deny this request.

REQUEST NO. 142

Admit that Exhibit 1858 was written by Serge Gratch to Roy L. Gealer.

RESPONSE:

After a reasonable inquiry, the information known or readily obtainable to Ford is insufficient to enable Ford to either admit or deny this request. Ford otherwise objects to this request as neither relevant to the issues in this lawsuit, nor reasonably calculated to lead to the discovery of admissible evidence. Ford also objects to this request because the information may no longer be available to Ford to either admit or deny this request.

REQUEST NO. 143

Admit that Serge Gratch and Roy L. Gealer were employed by you on February 19, 1970, the date Exhibit 1858 was written.

RESPONSE:

Based upon information currently known to Ford, Ford admits only that Serge Gratch and Roy L. Gealer were employed by Ford on February 19, 1970. With respect to any remaining part of this request, and after a reasonable inquiry, the information known or readily obtainable to Ford is insufficient to enable Ford to either admit or deny this request.

REQUEST NO. 144

Admit that Exhibit 1859 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 145

Admit that Exhibit 1859 is a business record.

RESPONSE:

With the exception of the exhibit sticker that is not present on the original document, Ford admits that the document identified by plaintiffs as Exhibit No. 1859, Bates stamped numbers 8006 2006-2007, appears to be a record of Ford's regularly conducted business activity.

REQUEST NO. 146

Admit that Exhibit 1860 is an ancient document

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 147

Admit that Exhibit 1860 is a business record

RESPONSE:

Ford denies this request as untrue.

REQUEST NO. 148

Admit that Exhibit 1861 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 149

Admit that Exhibit 1861 is a business record.

RESPONSE:

With the exception of the exhibit sticker that is not present on the original document, Ford admits that the document identified by plaintiffs as Exhibit No. 1861, Bates stamped numbers 8000 0003-0005, appears to be a record of Ford's regularly conducted business activity.

REQUEST NO. 150

Admit that Exhibit 1862 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 151

Admit that Exhibit 1862 is a business record.

RESPONSE:

With the exception of the exhibit sticker that is not present on the original document, Ford admits that the document identified by plaintiffs as Exhibit No. 1862, Bates stamped numbers 8007 1027-1032, appears to be a record of Ford's regularly conducted business activity.

REQUEST NO. 152

Admit that Exhibit 1863 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 153

Admit that Exhibit 1863 is a business record.

RESPONSE:

With the exception of the exhibit sticker that is not present on the original document, Ford admits that the document identified by plaintiffs as Exhibit No. 1863, Bates stamped number 8000 1207-1207, appears to be a record of Ford's regularly conducted business activity.

REQUEST NO. 154

Admit that Exhibit 1864 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 155

Admit that Exhibit 1864 is a business record

RESPONSE:

With the exception of the exhibit sticker that is not present on the original document, Ford admits that the document identified by plaintiffs as Exhibit No. 1864, Bates stamped numbers 8000 0169-0172, appears to be a record of Ford's regularly conducted business activity.

REQUEST NO. 156

Admit that Exhibit 1865 is an ancient document

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 157

Admit that Exhibit 1865 is a business record.

RESPONSE:

Ford denies this request as untrue.

REQUEST NO. 158

Admit that you subscribed to Air and Water News on June 15, 1970.

RESPONSE:

Ford objects to this request as overly broad and unduly burdensome because it would require Ford to poll each and every current and/or past employee to obtain the answer to this request. Moreover, the information sought in this request is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

REQUEST NO. 159

Admit that Exhibit 1866 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 160

Admit that Exhibit 1866 is a business record.

RESPONSE:

Ford objects to this request as overly broad, unduly burdensome and neither relevant to the issues in this lawsuit nor reasonably calculated to lead to the discovery of admissible evidence. Further, based on the limited information contained in this document, Ford can neither admit nor deny this request as written.

REQUEST NO. 161

Admit that the articles and publications listed on Exhibit 1866 were found in the Engineering and Research Library of the Ford Motor Company as of July 1970.

RESPONSE:

After a reasonable inquiry, the information known or readily obtainable to Ford is insufficient to enable Ford to either admit or deny this request. Ford otherwise objects to this request because it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

REQUEST NO. 162

Admit that Exhibit 1867 is an ancient document

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 163

Admit that Exhibit 1867 is a business record

RESPONSE:

With the exception of the exhibit sticker that is not present on the original document, Ford admits that the document identified by plaintiffs as Exhibit No. 1867, Bates stamped numbers 8002 1883-1887, appears to be a record of Ford's regularly conducted business activity.

REQUEST NO. 164

Admit that Exhibit 1868 is an ancient document

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 165

Admit that Exhibit 1868 is a business record

RESPONSE:

With the exception of the exhibit sticker that is not present on the original document, Ford admits that the document identified by plaintiffs as Exhibit No. 1868, Bates stamped numbers 8006 1850-1851 only, appears to be a record of Ford's regularly conducted business activity. Ford denies this request as untrue with respect to Exhibit No. 1868, Bates stamped numbers 8006 1852-1856.

REQUEST NO. 166

Admit that Exhibit 1869 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 167

Admit that Exhibit 1869 is a business record

RESPONSE:

With the exception of the exhibit sticker that is not present on the original document, Ford admits that the document identified by plaintiffs as Exhibit No. 1869, Bates stamped numbers 8007 1033-1040, appears to be a record of Ford's regularly conducted business activity.

REQUEST NO. 168

Admit that Exhibit 1870 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 169

Admit that Exhibit 1870 is a business record.

RESPONSE:

With the exception of the exhibit sticker that is not present on the original document, Ford admits that the document identified by plaintiffs as Exhibit No. 1870, Bates stamped number 8006 1907-1907, appears to be a record of Ford's regularly conducted business activity. Ford denies this request as untrue with respect to Exhibit No. 1870, Bates stamped numbers 8006 1908-1909.

REQUEST NO. 170

Admit that Exhibit 1871 is an ancient document

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 171

Admit that Exhibit 1871 is a business record.

RESPONSE:

With the exception of the exhibit sticker that is not present on the original document, Ford admits only that Exhibit No. 1871, Bates stamped number 8000 0019-0019, consists of an incomplete document without attachments that would otherwise appear to be a record of Ford's regularly conducted business activity. Ford denies any remaining part of this request as untrue.

REQUEST NO. 172

Admit that Exhibit 1872 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 173

Admit that Exhibit 1872 is a business record.

RESPONSE:

After a reasonable inquiry, the information known or readily obtainable to Ford is insufficient to enable Ford to either admit or deny this request.

REQUEST NO. 174

Admit that Exhibit 1872 was authored by Roy L. Gealer.

RESPONSE:

After a reasonable inquiry, the information known or readily obtainable to Ford is insufficient to enable Ford to either admit or deny this request. Ford otherwise objects to this request because it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

REQUEST NO. 175

Admit that on October 20, 1970 Roy L. Gealer was employed by you.

RESPONSE:

Based on information currently known to Ford, Ford admits this request.

REQUEST NO. 176

Admit that Exhibit 1873 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 177

Admit that Exhibit 1873 is a business record.

RESPONSE:

Ford denies this request as untrue.

REQUEST NO. 178

Admit that on November 2, 1970, the date of Exhibit 1873, Dr. Roy L. Gealer was employed by the Ford Motor Company in its Chemical Engineering Department.

RESPONSE:

Ford admits only that on November 2, 1970, Roy L. Gealer was employed by Ford in its Chemical Engineering Department. Ford objects to any remaining part of this request because it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

REQUEST NO. 179

Admit that Exhibit 1874 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 180

Admit that Exhibit 1874 is a business record.

RESPONSE:

With the exception of the exhibit sticker that is not present on the original document, Ford admits that the document identified by plaintiffs as Exhibit No. 1874, Bates stamped number 8000 0316-0316, appears to be a record of Ford's regularly conducted business activity, with the exception of the P.S. on the bottom of the document, which Ford denies as untrue.

REQUEST NO. 181

Admit that Exhibit 1875 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 182

Admit that Exhibit 1875 is a business record.

RESPONSE:

Ford denies this request as untrue.

REQUEST NO. 183

Admit that Exhibit 1875 was received by Dr. Roy L. Gealer in the Chemical Engineering Department of the Ford Motor Company in Dearborn, Michigan.

RESPONSE:

Ford objects to this request because it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Ford also objects to this request because, after a reasonable inquiry, the information known or readily obtainable to Ford is insufficient to enable Ford to either admit or deny this request.

REQUEST NO. 184

Admit that Exhibit 1876 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 185

Admit that Exhibit 1876 is a business record.

RESPONSE:

With the exception of the exhibit sticker that is not present on the original document, Ford admits that the document identified by plaintiffs as Exhibit No. 1876, Bates stamped numbers 8000 0311-0312, appears to be a record of Ford's regularly conducted business activity.

REQUEST NO. 186

Admit that Exhibit 1877 is an ancient document

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 187

Admit that Exhibit 1877 is a business record.

RESPONSE:

After a reasonable inquiry, the information known or readily obtainable to Ford is insufficient to enable Ford to either admit or deny this request.

REQUEST NO. 188

Admit that Exhibit 1877 was received by Dr. Roy L. Gealer in the Chemical Engineering Department of the Ford Motor Company in Dearborn, Michigan.

RESPONSE:

Ford objects to this request because it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Ford also objects to this request because, after a reasonable inquiry, the information known or readily obtainable to Ford is insufficient to enable Ford to either admit or deny this request.

REQUEST NO. 189

Admit that Exhibit 1878 is an ancient document

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 190

Admit that Exhibit 1878 is a business record.

RESPONSE:

With the exception of the exhibit sticker that is not present on the original document, Ford admits only that Exhibit No. 1878, Bates stamped numbers 8001 0048-0050, consists of an incomplete document without attachments that would otherwise appear to be a record of Ford's regularly conducted business activity. Ford denies any remaining part of this request as untrue.

REQUEST NO. 191

Admit that Exhibit 1879 as an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 192

Admit that Exhibit 1879 is a business for it.

RESPONSE:

Ford objects to this request as vague, ambiguous and nonsensical.

REQUEST NO. 193

Admit that a copy of Exhibit 1879 was sent to Ford Motor Company personnel in 1970.

RESPONSE:

Ford objects to this request as overly broad and unduly burdensome because it would require Ford to poll each and every current and/or past employee to obtain the answer to this request. Ford also objects to this request because it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

REQUEST NO. 194

Admit that Exhibit 1880 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 195

Admit that Exhibit 1880 is a business record.

RESPONSE:

With the exception of the exhibit sticker that is not present on the original document, Ford admits that the document identified by plaintiffs as Exhibit No. 1880, Bates stamped number 8000 0211-0211 only, appears to be a record of Ford's regularly conducted business activity. After a reasonable inquiry, the information known or readily obtainable to Ford is insufficient to enable Ford to either admit or deny this request with respect to Exhibit No. 1880, Bates stamped numbers 8000 0210-0210 and 8000 0212-0219.

REQUEST NO. 196

Admit that Exhibit 1881 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 197

Admit that Exhibit 1881 is a business record.

RESPONSE:

With the exception of the exhibit sticker that is not present on the original document, Ford admits that the document identified by plaintiffs as Exhibit No. 1881, Bates stamped number 8000 0178-0178, appears to be a record of Ford's regularly conducted business activity.

REQUEST NO. 198

Admit that in November 1970, Ford Motor Company had an electron microscope.

RESPONSE:

After a reasonable inquiry, the information known or readily obtainable to Ford is insufficient to enable Ford to either admit or deny this request. Ford otherwise objects to this request because it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence

REQUEST NO. 199

Admit that Exhibit 1882 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 200

Admit that Exhibit 1882 was received by Dr. Roy L. Gealer in December 1970.

RESPONSE:

Ford objects to this request because it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Ford also objects to this request because, after a reasonable inquiry, the information known or readily obtainable to Ford is insufficient to enable Ford to either admit or deny this request.

REQUEST NO. 201

Admit that Exhibit 1883 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 202

Admit that Exhibit 1883 is a business record.

RESPONSE:

With the exception of the exhibit sticker that is not present on the original document, Ford admits that the document identified by plaintiffs as Exhibit No. 1883, Bates stamped numbers 8000 0020-0024, appears to be a record of Ford's regularly conducted business activity.

REQUEST NO. 203

Admit that Exhibit 1884 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 204

Admit that Exhibit 1884 is a business record.

RESPONSE:

With the exception of the exhibit sticker that is not present on the original document, Ford admits that the document identified by plaintiffs as Exhibit No. 1884, Bates stamped numbers 8007 1041-1044, appears to be a record of Ford's regularly conducted business activity.

REQUEST NO. 205

Admit that Exhibit 1885 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 206

Admit that Exhibit 1885 is a business record.

RESPONSE:

Ford denies this request as untrue.

REQUEST NO. 207

Admit that Exhibit 18 a five is a public record.

RESPONSE:

Ford objects to this request as vague, ambiguous and nonsensical. Ford also objects to this request to the extent that it seeks information that is available in the public domain. Ford further objects to this request because it requires Ford to conduct a search of information outside of its possession, custody and control to adequately respond

REQUEST NO. 208

Admit that Exhibit 1885 is a learned treatise.

RESPONSE:

Ford denies this request as untrue.

REQUEST NO. 209

Admit that Exhibit 1886 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 210

Admit that Exhibit 1886 is a business record.

RESPONSE:

With the exception of the exhibit sticker that is not present on the original document and the handwritten marginalia, Ford admits only that Exhibit No. 1886, Bates stamped numbers 8003 0644-0649, consists of excerpts from a portion of the 1971 Car Shop Manual Volume 1 Chassis and that the manual, in its entirety, appears to be a record of Ford's regularly conducted business activity. Ford denies any remaining part of this request as untrue.

REQUEST NO. 211

Admit that Exhibit 1886 is the general hydraulic brake service section of the 1971 Ford car manual.

RESPONSE:

With the exception of the exhibit sticker that is not present on the original document and the handwritten marginalia, Ford admits only that Exhibit No. 1886, Bates stamped numbers 8003 0644-0645, consists of excerpts from a portion of the 1971 Car Shop Manual Volume 1 Chassis entitled "General Hydraulic Brake Service" and that Exhibit No. 1886, Bates stamped numbers 8003 0646-0649, consists of excerpts from a portion of the 1971 Car Shop Manual Volume 1 Chassis entitled "Drum Brake, Single Cylinder, Dual Piston." Ford denies any remaining part of this request as untrue

REQUEST NO. 212

Admit that Exhibit 1887 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 213

Admit that Exhibit 1887 is a business record.

RESPONSE:

With the exception of the exhibit sticker that is not present on the original document, Ford admits only that Exhibit No. 1887, Bates stamped number 8000 0306-0306, consists of an incomplete document without an enclosure that would otherwise appear to be a record of Ford's regularly conducted business activity Ford denies any remaining part of this request as untrue.

REQUEST NO. 214

Admit that Exhibit 1888 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written

REQUEST NO. 215

Admit that Exhibit 1888 is a business record.

RESPONSE:

After a reasonable inquiry, the information known or readily obtainable to Ford is insufficient to enable Ford to either admit or deny this request.

REQUEST NO. 216

Admit that Exhibit 1888 was written by Dr. Roy L. Gealer while employed by you.

RESPONSE:

After a reasonable inquiry, the information known or readily obtainable to Ford is insufficient to enable Ford to either admit or deny this request. Ford otherwise objects to this request because it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Ford also objects to this request because, after a reasonable inquiry, the information may no longer be available to Ford to either admit or deny this request.

REQUEST NO. 217

Admit that Exhibit 1889 as an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written

REQUEST NO. 218

Admit that Exhibit 1889 is a business record

RESPONSE:

Ford denies this request as untrue.

REQUEST NO. 219

Admit that you were a member of the National Safety Council in 1971.

RESPONSE:

Based on information currently known to Ford, Ford admits this request

REQUEST NO. 220

Admit that Exhibit 1890 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 221

Admit that Exhibit 1891 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written

REQUEST NO. 222

Admit that Exhibit 1891 is a business record.

RESPONSE:

Ford denies this request as untrue.

REQUEST NO. 223

Admit that Exhibit 1892 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 224

Admit that Exhibit 1892 is business record.

RESPONSE:

Ford denies this request as untrue.

REQUEST NO. 225

Admit that Dr. Roy L. Gealer received a copy of Exhibit 1892 while employed by you.

RESPONSE:

Ford objects to this request because it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Ford also objects to this request because Mr. Gealer is no longer employed with Ford, and after a reasonable inquiry, the information known or readily obtainable to Ford is insufficient to enable Ford to either admit or deny this request.

REQUEST NO. 226

Admit that Exhibit 1893 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 227

Admit that Exhibit 1893 is a business record.

RESPONSE:

With the exception of the exhibit sticker that is not present on the original document, Ford admits only that Exhibit No. 1893, Bates stamped numbers 8000 1667-1668, consists of an incomplete document without attachments that would otherwise appear to be a record of Ford's regularly conducted business activity. Ford denies any remaining part of this request as untrue.

REQUEST NO. 228

Admit that Exhibit 1894 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 229

Admit that Exhibit 1894 to business record.

RESPONSE:

Ford denies this request as untrue.

REQUEST NO. 230

Admit that Exhibit 1894 was received by Mr. D. A. Jensen on July 22, 1971.

RESPONSE:

Ford objects to this request because it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Ford also objects to this request because, after a reasonable inquiry, the information known or readily obtainable to Ford is insufficient to enable Ford to either admit or deny this request.

REQUEST NO. 231

Admit that Mr. D. A. Jensen was employed by you on July 22, 1971.

RESPONSE:

Ford objects to this request because it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

REQUEST NO. 232

Admit that Exhibit 1895 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 233

Admit that Exhibit 1895 is a business record

RESPONSE:

Ford objects to this request to the extent that it is overly broad, and seeks information that is neither relevant to the issues in this lawsuit, nor reasonably calculated to lead to the discovery of admissible evidence. Further, Ford objects to this request because it seeks information in

violation of Ford's constitutional right to lobby the government. This information is exempt from discovery under the line of cases known as the "Noerr Pennington doctrine" as expressed in *In re Burlington Northern*, 822 F. 2d 518 (5th Cir. 1987).

REQUEST NO. 234

Admit that Exhibit 1896 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 235

Admit that Exhibit 1896 a business record.

RESPONSE:

With the exception of the exhibit sticker that is not present on the original document, Ford admits that the document identified by plaintiffs as Exhibit No. 1896, Bates stamped numbers 8000 0468-0469, appears to be a record of Ford's regularly conducted business activity.

REQUEST NO. 236

Admit that Exhibit 1897 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 237

Admit that Exhibit 1897 is a business record.

RESPONSE:

With the exception of the exhibit sticker that is not present on the original document, Ford admits that the document identified by plaintiffs as Exhibit No. 1897, Bates stamped numbers 8006 1802-1804, appears to be a record of Ford's regularly conducted business activity.

REQUEST NO. 238

Admit that Exhibit 1898 is an ancient document

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 239

Admit that Exhibit 1898 is a business record.

RESPONSE:

Ford objects to this request to the extent that it is overly broad, and seeks information that is neither relevant to the issues in this lawsuit, nor reasonably calculated to lead to the discovery of admissible evidence. Further, Ford objects to this request because it seeks information in violation of Ford's constitutional right to lobby the government. This information is exempt from discovery under the line of cases known as the "Noerr Pennington doctrine" as expressed in *In re Burlington Northern*, 822 F. 2d 518 (5th Cir. 1987).

REQUEST NO. 240

Admit that Exhibit 1899 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 241

Admit that Exhibit 1899 is a business record.

RESPONSE:

After a reasonable inquiry, the information known or readily obtainable to Ford is insufficient to enable Ford to either admit or deny this request.

REQUEST NO. 242

Admit that Exhibit 1899 was written by Dr. Roy L. Gealer.

RESPONSE:

Ford objects to this request because it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Ford also objects to this request because, after a reasonable inquiry, the information known or readily obtainable to Ford is insufficient to enable Ford to either admit or deny this request.

REQUEST NO. 243

Admit that Dr. Roy L. Gealer was employed by you on the date that Exhibit 1899 was written.

RESPONSE:

Ford admits only that Roy L. Gealer was employed by Ford on the date noted in the exhibit as November 29, 1979. After a reasonable inquiry, the information known or readily obtainable to Ford is insufficient to enable Ford to either admit or deny any remaining part of this request.

REQUEST NO. 244

Admit that Exhibit 1900 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written

REQUEST NO. 245

Admit that Exhibit 1900 is a learned treatise.

RESPONSE:

Ford denies this request as untrue.

REQUEST NO. 246

Admit that Exhibit 1901 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 247

Admit that Exhibit 1901 is a business record

RESPONSE:

With the exception of the exhibit sticker that is not present on the original document, Ford admits that the document identified by plaintiffs as Exhibit No 1901, Bates stamped numbers 8003 0231-0239, appears to be a record of Ford's regularly conducted business activity.

REQUEST NO. 248

Admit that Exhibit 1902 was an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 249

Admit that Exhibit 1902 is a business record.

RESPONSE:

Ford denies this request as untrue.

REQUEST NO. 250

Admit that on December 6, 1971, employees of the Ford Motor Company subscribed to the Wall Street Journal.

RESPONSE:

Ford objects to this request as overly broad and unduly burdensome because it would require Ford to poll each and every current and/or past employee to obtain the answer to this request. Moreover, this information is neither relevant to the issues in this lawsuit, nor reasonably calculated to lead to the discovery of admissible evidence.

REQUEST NO. 251

Admit that Exhibit 1903 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written

REQUEST NO. 252

Admit that Exhibit 1903 is a learned treatise.

RESPONSE:

Ford denies this request as untrue.

REQUEST NO. 253

Admit that Exhibit 1903 is a public record.

RESPONSE:

Ford objects to this request because it seeks information that is available in the public domain. Ford also objects to this request because it requires Ford to conduct a search of information outside of its possession, custody and control to adequately respond. Accordingly, Ford is without current knowledge or information sufficient to admit or deny this request.

REQUEST NO. 254

Admit that Exhibit 1904 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 255

Admit that Exhibit 1904 is a business record.

RESPONSE:

Ford denies this request as untrue.

REQUEST NO. 256

Admit that Ford Motor Company was a member of the Automobile Manufacturers Association, Inc. on January 12, 1972.

RESPONSE:

Based on information currently known to Ford, Ford admits this request.

REQUEST NO. 257

Admit that Exhibit 1905 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written

REQUEST NO. 258

Admit that Exhibit 1905 is a business record.

RESPONSE:

With the exception of the exhibit sticker that is not present on the original document, Ford admits that the document identified by plaintiffs as Exhibit No. 1905, Bates stamped numbers 8004 0506-0507 only, appears to be a record of Ford's regularly conducted business activity. Ford denies this request as untrue with respect to Exhibit No. 1905, Bates stamped numbers 8004 0508-0528.

REQUEST NO. 259

Admit that Exhibit 1906 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 260

Admit that Exhibit 1906 is a business record.

RESPONSE:

With the exception of the exhibit sticker that is not present on the original document, Ford admits that the document identified by plaintiffs as Exhibit No. 1906, Bates stamped number 8000 0462-0462, appears to be a record of Ford's regularly conducted business activity.

REQUEST NO. 261

Admit that Exhibit 1907 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 262

Admit that Exhibit 1907 is a business record.

RESPONSE:

Ford denies this request as untrue.

REQUEST NO. 263

Admit that Exhibit 1908 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 264

Admit that Exhibit 1908 is a business record.

RESPONSE:

With the exception of the exhibit sticker that is not present on the original document, Ford admits only that Exhibit No. 1908, Bates stamped numbers 8006 1739-1740, consists of an incomplete document without an enclosure that would otherwise appear to be a record of Ford's regularly conducted business activity. Ford denies any remaining part of this request as untrue.

REQUEST NO. 265

Admit that Exhibit 1909 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 266

Admit that Exhibit 1909 is a business record.

RESPONSE:

Ford denies this request as untrue.

REQUEST NO. 267

Admit that Exhibit 1909 is a public record.

RESPONSE:

Ford objects to this request because it seeks information that is available in the public domain. Ford also objects to this request because it requires Ford to conduct a search of information outside of its possession, custody and control to adequately respond. Accordingly, Ford is without current knowledge or information sufficient to admit or deny this request.

REQUEST NO. 268

Admit that Exhibit 1910 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written

REQUEST NO. 269

Admit that Exhibit 1910 is a business record.

RESPONSE:

Ford denies this request as untrue.

REQUEST NO. 270

Admit that Exhibit 1911 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 271

Admit that Exhibit 1911 is a business record

RESPONSE:

With the exception of the exhibit sticker that is not present on the original document, Ford admits that the document identified by plaintiffs as Exhibit No. 1911, Bates stamped numbers 8005 0370-0373, appears to be a record of Ford's regularly conducted business activity.

REQUEST NO. 272

Admit that Exhibit 1912 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 273

Admit that Exhibit 1912 is a business record.

RESPONSE:

After a reasonable inquiry, the information known or readily obtainable to Ford is insufficient to enable Ford to either admit or deny this request.

REQUEST NO. 274

Admit that Exhibit 1912 was written by Dr. Roy L. Gealer.

RESPONSE:

Ford objects to this request because it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Ford also objects to this request because, after a reasonable inquiry, the information known or readily obtainable to Ford is insufficient to enable Ford to either admit or deny this request.

REQUEST NO. 275

Admit that Exhibit 1912 was received by Serge Gratch.

RESPONSE:

Ford objects to this request because it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Ford also objects to this request because, after a reasonable inquiry, the information known or readily obtainable to Ford is insufficient to enable Ford to either admit or deny this request.

REQUEST NO. 276

Admit that Exhibit 1913 as an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written

REQUEST NO. 277

Admit that Exhibit 1913 is a business record.

RESPONSE:

Ford denies this request as untrue.

REQUEST NO. 278

Admit that Exhibit 1914 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 279

Admit that Exhibit 1914 is a business record

RESPONSE:

With the exception of the exhibit sticker that is not present on the original document, Ford admits that the document identified by plaintiffs as Exhibit No. 1914, Bates stamped number 8000 1567-1567, appears to be a record of Ford's regularly conducted business activity.

REQUEST NO. 280

Admit that Exhibit 1915 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 281

Admit that Exhibit 1915 is a business record.

RESPONSE:

With the exception of the exhibit sticker that is not present on the original document, Ford admits that the document identified by plaintiffs as Exhibit No. 1915, Bates stamped numbers 8000 1562-1566, appears to be a record of Ford's regularly conducted business activity.

REQUEST NO. 282

Admit that Exhibit 1916 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 283

Admit that Exhibit 1916 is a business record.

RESPONSE:

With the exception of the exhibit sticker that is not present on the original document, Ford admits that the document identified by plaintiffs as Exhibit No. 1916, Bates stamped number 8005 0383-0383, appears to be a record of Ford's regularly conducted business activity.

REQUEST NO. 284

Admit that Exhibit 1917 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 285

And that Exhibit 1917 is a business record.

RESPONSE:

With the exception of the exhibit sticker that is not present on the original document, Ford admits that the document identified by plaintiffs as Exhibit No. 1917, Bates stamped numbers 8003 1130-1137, appears to be a record of Ford's regularly conducted business activity.

REQUEST NO. 286

Admit that Exhibit 1918 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written

REQUEST NO. 287

Admit that Exhibit 1918 is a business record.

RESPONSE:

Ford denies this request as untrue.

REQUEST NO. 288

Admit that the Union Carbide Corporation supplied Caladria Asbestos for use in your asbestos containing products.

RESPONSE:

Ford objects to this request because it is overly broad and seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

REQUEST NO. 289

Admit that Exhibit 1919 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 290

Admit that Exhibit 99 team is a business record.

RESPONSE:

Ford objects to this request as vague, ambiguous and nonsensical.

REQUEST NO. 291

Admit that Exhibit 1920 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 292

Admit that Exhibit 1920 is a business record.

RESPONSE:

After a reasonable inquiry, the information known or readily obtainable to Ford is insufficient to enable Ford to either admit or deny this request.

REQUEST NO. 293

Admit that Exhibit 1921 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 294

Admit that Exhibit 1921 is a business record.

RESPONSE:

With the exception of the exhibit sticker that is not present on the original document, Ford admits that the document identified by plaintiffs as Exhibit No. 1921, Bates stamped number 8004 1006-1006, appears to be a record of Ford's regularly conducted business activity.

REQUEST NO. 295

Admit that Exhibit 1922 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written

REQUEST NO. 296

Admit that Exhibit 19. 2 is a business record.

RESPONSE:

Ford objects to this request as vague and ambiguous because plaintiffs did not provide an Exhibit No. 19. 2.

REQUEST NO. 297

Admit that Exhibit 1923 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written

REQUEST NO. 298

Admit that Exhibit 1923 is a business record.

RESPONSE:

Ford denies this request as untrue.

REQUEST NO. 299

Admit that Exhibit 1924 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 300

Admit that Exhibit 1924 is a business record.

RESPONSE:

With the exception of the exhibit sticker that is not present on the original document, Ford admits that the document identified by plaintiffs as Exhibit No. 1924, Bates stamped number 8005 0330-0330, appears to be a record of Ford's regularly conducted business activity.

REQUEST NO. 301

Admit that Exhibit 1925 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 302

Admit that Exhibit 1925 is a business record.

RESPONSE:

Ford denies this request as untrue.

REQUEST NO. 303

Admit that Exhibit 1925 is a public record.

RESPONSE:

Ford objects to this request because it seeks information that is available in the public domain. Ford also objects to this request because it requires Ford to conduct a search of information outside of its possession, custody and control to adequately respond. Accordingly, Ford is without current knowledge or information sufficient to admit or deny this request.

REQUEST NO. 304

Admit that Exhibit 1926 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 305

Admit that Exhibit 1926 is a business record.

RESPONSE:

With the exception of the exhibit sticker that is not present on the original document, Ford admits that the document identified by plaintiffs as Exhibit No 1926, Bates stamped number 8005 0318-0318, appears to be a record of Ford's regularly conducted business activity.

REQUEST NO. 306

Admit that Exhibit 1927 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 307

Admit that Exhibit 1927 is a business record.

RESPONSE:

With the exception of the exhibit sticker that is not present on the original document, Ford admits that the document identified by plaintiffs as Exhibit No 1927, Bates stamped numbers 8000 1178-1181 only, appears to be a record of Ford's regularly conducted business activity. Ford denies this request as untrue with respect to Exhibit No. 1829, Bates stamped number 8000 1182-1182.

REQUEST NO. 308

Admit that Exhibit 1928 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 309

Admit that Exhibit 1928 is a business record

RESPONSE:

With the exception of the exhibit sticker that is not present on the original document, Ford admits that the document identified by plaintiffs as Exhibit No. 1928, Bates stamped numbers 8005 0277-0278, appears to be a record of Ford's regularly conducted business activity.

REQUEST NO. 310

Admit that Exhibit 1929 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 311

Admit that Exhibit 1929 is a business record

RESPONSE:

Ford denies this request as untrue

REQUEST NO. 312

Admit that Exhibit 1930 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 313

Admit that Exhibit 1930 is a business record.

RESPONSE:

With the exception of the exhibit sticker that is not present on the original document and the handwritten marginalia, Ford admits only that Exhibit No. 1930, Bates stamped numbers 8003 0659-0660, consists of excerpts from a portion of the 1973 Car Shop Manual Volume 1 Chassis and that the manual, in its entirety, appears to be a record of Ford's regularly conducted business activity. Ford denies any remaining part of this request as untrue.

REQUEST NO. 314

Admit that Exhibit 1930 is the general hydraulic brake service section of the 1973 Ford car manual

RESPONSE:

With the exception of the exhibit sticker that is not present on the original document and the handwritten marginalia, Ford admits only that Exhibit No. 1930, Bates stamped numbers 8003 0659-0660, consists of excerpts from a portion of the 1973 Car Shop Manual Volume 1 Chassis entitled "General Hydraulic Brake Service." Ford denies any remaining part of this request as untrue.

REQUEST NO. 315

Admit that Exhibit 1931 as [sic] an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 316

Admit that Exhibit 1931 is a business record.

RESPONSE:

With the exception of the exhibit sticker, plaintiffs' Bates labeling marginalia and "PROPERTY OF FORD MOTOR COMPANY" that are not present on the original document, Ford admits that the document identified by plaintiffs as Exhibit No. 1931, identified in Ford's collection as Bates stamped number 007328-007328, appears to be a record of Ford's regularly conducted business activity. Ford denies any remaining part of this request as untrue.

REQUEST NO. 317

Admit that the name “Rotunda” is a trademark of the Ford Motor Company.

RESPONSE:

Ford objects to this request because it is overly broad and seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Ford also objects to this request because the information, if any, is available in the public domain.

REQUEST NO. 318

Admit that Exhibit 1932 was an ancient document.

RESPONSE:

Ford objects to plaintiffs’ proposed definition of the term “ancient document” because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written

REQUEST NO. 319

Admit that Exhibit 1932 is a business record.

RESPONSE:

With the exception of the exhibit sticker that is not present on the original document, Ford admits that the document identified by plaintiffs as Exhibit No. 1932, Bates stamped number 8000 0302-0302, appears to be a record of Ford’s regularly conducted business activity.

REQUEST NO. 320

Admit that Exhibit 1933 is an ancient document.

RESPONSE:

Ford objects to plaintiffs’ proposed definition of the term “ancient document” because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written

REQUEST NO. 321

Admit that Exhibit 1933 is a business record.

RESPONSE:

Ford denies this request as untrue.

REQUEST NO. 322

Admit that Exhibit 1934 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 233

Admit that Exhibit 1934 is a business record

RESPONSE:

With the exception of the exhibit sticker that is not present on the original document, Ford admits that the document identified by plaintiffs as Exhibit No. 1934, Bates stamped numbers 8000 1175-1177, appears to be a record of Ford's regularly conducted business activity.

REQUEST NO. 324

Admit that Exhibit 1935 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 325

Admit that Exhibit 1935 is a business record.

RESPONSE:

Ford denies this request as untrue.

REQUEST NO. 326

Admit that Exhibit 1936 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 327

Admit that Exhibit 1936 is a business record.

RESPONSE:

With the exception of the exhibit sticker that is not present on the original document, Ford admits that the document identified by plaintiffs as Exhibit No. 1936, Bates stamped numbers 8006 2002-2005, appears to be a record of Ford's regularly conducted business activity.

REQUEST NO. 328

Admit that Exhibit 1937 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 329

Admit that Exhibit 1937 is a business record.

RESPONSE:

With the exception of the exhibit sticker that is not present on the original document, Ford admits that the document identified by plaintiffs as Exhibit No. 1937, Bates stamped numbers 8006 1815-1819, appears to be a record of Ford's regularly conducted business activity. Ford denies any remaining part of this request as untrue.

REQUEST NO. 330

Admit that Exhibit 1938 is an ancient document

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 331

Admit that Exhibit 1938 is a business record.

RESPONSE:

After a reasonable inquiry, the information known or readily obtainable to Ford is insufficient to enable Ford to either admit or deny this request.

REQUEST NO. 332

Admit that Exhibit 1938 was written by Dr. Roy L. Gealer.

RESPONSE:

Ford objects to this request because it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Ford also objects to this request because, after a reasonable inquiry, the information known or readily obtainable to Ford is insufficient to enable Ford to either admit or deny this request.

REQUEST NO. 333

Admit that Exhibit 1939 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 334

Admit that Exhibit 1939 is a business record

RESPONSE:

With the exception of the exhibit sticker that is not present on the original document, Ford admits that the document identified by plaintiffs as Exhibit No. 1939, Bates stamped numbers 8005 0804-0806, appears to be a record of Ford's regularly conducted business activity.

REQUEST NO. 335

Admit that Exhibit 1940 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 336

Admit that Exhibit 1940 is a business records.

RESPONSE:

With the exception of the exhibit sticker that is not present on the original document, Ford admits that the document identified by plaintiffs as Exhibit No. 1940, Bates stamped

numbers 8000 0258-0259, appears to be a record of Ford's regularly conducted business activity. Ford denies this request as untrue with respect to Exhibit No. 1940, Bates stamped numbers 8000 0260-0261.

REQUEST NO. 337

Admit that Exhibit 1941 as an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written

REQUEST NO. 338

Admit that Exhibit 1941 is a business record

RESPONSE:

With the exception of the exhibit sticker, plaintiff's Bates numbering marginalia and the "PROPERTY OF FORD MOTOR COMPANY" markings that are not present on the original document, Ford admits that plaintiff's Exhibit No. 1941, identified in Ford's collection as Bates stamped numbers 8004 0984-0987, appears to be a redacted and incomplete record of Ford's regularly conducted business activity. Ford denies any remaining part of this request as untrue.

REQUEST NO. 339

Admit that Exhibit 1942 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 340

Admit that Exhibit 1942 is a business record

RESPONSE:

With the exception of the exhibit sticker that is not present on the original document, Ford admits that the document identified by plaintiffs as Exhibit No. 1942, Bates stamped number 8006 0711-0711, appears to be a record of Ford's regularly conducted business activity.

REQUEST NO. 341

Admit that Exhibit 1943 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 342

Admit that Exhibit 1943 say business record.

RESPONSE:

Ford objects to this request as vague, ambiguous and nonsensical. Ford assumes that plaintiffs' use of the word "say" is meant to be "is a" and responds with that interpretation.

With the exception of the exhibit sticker that is not present on the original document, Ford admits that the document identified by plaintiffs as Exhibit No. 1943, Bates stamped number 8004 0889-0889, appears to be a record of Ford's regularly conducted business activity.

REQUEST NO. 343

Admit that Exhibit 1944 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 344

Admit that Exhibit 1944 is a business record.

RESPONSE:

With the exception of the exhibit sticker that is not present on the original document, Ford admits only that Exhibit No. 1944, Bates stamped numbers 8004 0675-0680, consists of an incomplete document that is missing one attachment that would otherwise appear to be a record of Ford's regularly conducted business activity.

REQUEST NO. 345

Admit that Exhibit 1945 is an ancient document

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 346

Admit that Exhibit 1945 is a business record.

RESPONSE:

With the exception of the exhibit sticker that is not present on the original document, Ford admits that the document identified by plaintiffs as Exhibit No. 1945, Bates stamped number 8005 0038-0040 and 8005 0041-0042 only, appear to be records of Ford's regularly conducted business activity.

After a reasonable inquiry, the information known or readily obtainable to Ford is insufficient to enable Ford to either admit or deny this request with respect to Exhibit No. 1945, Bates stamped number 8005 0043-0043. Ford admits that the document identified by plaintiffs as Exhibit No. 1945, Bates stamped number 8005 0044-0044 only, appears to be an incomplete record of Ford's regularly conducted business activity. Ford denies any remaining part of this request as untrue

REQUEST NO. 347

Admit that Exhibit 1946 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 348

Admit that Exhibit 1946 is a business record.

RESPONSE:

Ford denies this request as untrue.

REQUEST NO. 349

Admit that in June 1973, you subscribed to Automotive Engineering.

RESPONSE:

Ford objects to this request as overly broad and unduly burdensome because it would require Ford to poll each and every current and/or past employee to obtain the answer to this request. Moreover, this information is neither relevant to the issues in this lawsuit, nor reasonably calculated to lead to the discovery of admissible evidence.

REQUEST NO. 350

Admit that Exhibit 1947 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 351

Admit that Exhibit 1947 is a business record.

RESPONSE:

With the exception of the exhibit sticker that is not present on the original document, Ford admits that the document identified by plaintiffs as Exhibit No. 1947, Bates stamped numbers 8006 1681-1683 and 8006 1685-1685 only, appear to be records of Ford's regularly conducted business activity. Ford denies this request as untrue with respect to Exhibit No. 1947, Bates stamped number 8006 1684-1684.

REQUEST NO. 352

Admit that Exhibit 1948 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 353

Admit that Exhibit 1948 is a business record

RESPONSE:

With the exception of the exhibit sticker that is not present on the original document, Ford admits that the document identified by plaintiffs as Exhibit No. 1948, Bates stamped number 8006 0007-0007, appears to be a record of Ford's regularly conducted business activity.

REQUEST NO. 354

Admit that Exhibit 1949 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 355

Admit that Exhibit 1949 is a business record.

RESPONSE:

With the exception of the exhibit sticker that is not present on the original document, Ford admits that the document identified by plaintiffs as Exhibit No. 1949, Bates stamped number 8004 1642-1642, appears to be a record of Ford's regularly conducted business activity.

REQUEST NO. 356

Admit that Exhibit 1950 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 357

Admit that Exhibit 1950 is a business record.

RESPONSE:

With the exception of the exhibit sticker that is not present on the original document, Ford admits that the document identified by plaintiffs as Exhibit No. 1950, Bates stamped number 8000 1129-1129 only, appears to be a record of Ford's regularly conducted business activity. Ford denies this request as untrue with respect to Exhibit No. 1950, Bates stamped number 8000 1130-1171.

REQUEST NO. 358

Admit that Exhibit 1951 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 359

Admit that Exhibit 1951 is a business record.

RESPONSE:

With the exception of the exhibit sticker that is not present on the original document, Ford admits that the document identified by plaintiffs as Exhibit No. 1951, Bates stamped number 8004 0961-0961, appears to be a record of Ford's regularly conducted business activity.

REQUEST NO. 360

Admit that Exhibit 1952 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 361

Admit that Exhibit 1952 is a business record.

RESPONSE:

With the exception of the exhibit sticker, plaintiffs' Bates number marginalia and "PROPERTY OF FORD MOTOR COMPANY" that are not present on the original document, Ford admits that the document identified by plaintiffs as Exhibit No. 1952, identified in Ford's collection as Bates stamped number 003101-003101, appears to be a record of Ford's regularly conducted business activity. Ford denies any remaining part of this request as untrue.

REQUEST NO. 362

Admit that Exhibit 1953 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 363

Admit that Exhibit 1953 is a business record.

RESPONSE:

With the exception of the exhibit sticker that is not present on the original document, Ford admits that the document identified by plaintiffs as Exhibit No. 1953, Bates stamped number 8004 0951-0951, appears to be a record of Ford's regularly conducted business activity

REQUEST NO. 364

Admit that Exhibit 1954 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written

REQUEST NO. 365

Admit that Exhibit 1954 is a business record.

RESPONSE:

With the exception of the exhibit sticker that is not present on the original document, Ford admits that the document identified by plaintiffs as Exhibit No. 1954, Bates stamped numbers 8004 0939-0940, appears to be a record of Ford's regularly conducted business activity.

REQUEST NO. 366

Admit that Exhibit 1955 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 367

Admit that Exhibit 1955 is a business record.

RESPONSE:

Ford denies this request as untrue.

REQUEST NO. 368

Admit that Exhibit 1956 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 369

Admit that Exhibit 1956 is a business record.

RESPONSE:

With the exception of the exhibit sticker that is not present on the original document, Ford admits that the document identified by plaintiffs as Exhibit No. 1956, Bates stamped number 8000 1128-1128, appears to be a record of Ford's regularly conducted business activity.

REQUEST NO. 370

Admit that Exhibit 1957 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 371

Admit that Exhibit 1957 is a business record.

RESPONSE:

Ford denies this request as untrue.

REQUEST NO. 372

Admit that in December 1973, Dr. Duane Block was the medical director of the Ford Motor Company.

RESPONSE:

Based on information currently known to Ford, Ford admits this request.

REQUEST NO. 373

Admit that Exhibit 1958 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written

REQUEST NO. 374

Admit that Exhibit 1958 is a business record.

RESPONSE:

Ford denies this request as untrue.

REQUEST NO. 375

Admit that Exhibit 1959 as an ancient document

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 376

Admit that Exhibit 1959 is a business record.

RESPONSE:

With the exception of the exhibit sticker that is not present on the original document, Ford admits that the document identified by plaintiffs as Exhibit No. 1959, Bates stamped numbers 8003 0276-0278, appears to be a record of Ford's regularly conducted business activity.

REQUEST NO. 377

Admit that Exhibit 1960 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written

REQUEST NO. 378

Admit that Exhibit 1960 is a business record.

RESPONSE:

With the exception of the exhibit sticker that is not present on the original document, Ford admits only that Exhibit No. 1960, Bates stamped number 8006 0712-0712, consists of an incomplete document without an attachment that would otherwise appear to be a record of Ford's regularly conducted business activity. Ford denies any remaining part of this request as untrue.

REQUEST NO. 379

Admit that Exhibit 1961 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 380

Admit that Exhibit 1961 is a business record.

RESPONSE:

With the exception of the exhibit sticker that is not present on the original document, Ford admits that the document identified by plaintiffs as Exhibit No 1961, Bates stamped numbers 8006 0008-0010, appears to be a record of Ford's regularly conducted business activity.

REQUEST NO. 381

Admit that Exhibit 1962 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 382

Admit that Exhibit 1962 is a business record.

RESPONSE:

Ford denies this request as untrue.

REQUEST NO. 383

Admit that in December 1973, the Ford Motor Company was a member of the Industrial Hygiene Foundation.

RESPONSE:

Based on information currently known to Ford, Ford admits this request.

REQUEST NO. 384

Admit that Exhibit 1963 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 385

Admit that Exhibit 1963 is a business record.

RESPONSE:

With the exception of the exhibit sticker that is not present on the original document and the handwritten marginalia, Ford admits only that Exhibit No. 1963, Bates stamped numbers 8003 0712-0713, consists of excerpts from a portion of the 1974 Truck Shop Manual Volume 1 Chassis Second Printing and that the manual, in its entirety, appears to be a record of Ford's regularly conducted business activity. Ford denies any remaining part of this request as untrue.

REQUEST NO. 386

Admit that Exhibit 1963 is the General Hydraulic Brake Service section of the 1974 Ford truck manual.

RESPONSE:

With the exception of the exhibit sticker that is not present on the original document and the handwritten marginalia, Ford admits only that Exhibit No. 1963, Bates stamped numbers 8003 0712-0713, consists of excerpts from a portion of the 1974 Truck Shop Manual Volume 1 Chassis Second Printing entitled "General Hydraulic Brake Service." Ford denies any remaining part of this request as untrue.

REQUEST NO. 387

Admit that Exhibit 1964 is an ancient document

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written

REQUEST NO. 388

Admit that Exhibit 1964 is a business record.

RESPONSE:

Ford denies this request as untrue.

REQUEST NO. 389

Admit that Exhibit 1964 was received by Ford Motor Company from the Johns Manville Sales Corp

RESPONSE:

After a reasonable inquiry, the information known or readily obtainable to Ford is insufficient to enable Ford to either admit or deny this request. Ford otherwise objects to this request as neither relevant to the issues in this lawsuit, nor reasonably calculated to lead to the discovery of admissible evidence. Ford also objects to this request because the information may no longer be available to Ford to either admit or deny this request.

REQUEST NO. 390

Admit that Exhibit 1965 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 391

Admit that Exhibit 1965 is a business record.

RESPONSE:

With the exception of the exhibit sticker that is not present on the original document, Ford admits that the document identified by plaintiffs as Exhibit No 1965, Bates stamped numbers 8004 1646-1647, appears to be a record of Ford's regularly conducted business activity.

REQUEST NO. 392

Admit that Exhibit 1966 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 393

Admit that Exhibit 1966 is a business record.

RESPONSE:

With the exception of the exhibit sticker that is not present on the original document, Ford admits that the document identified by plaintiffs as Exhibit No. 1966, Bates stamped number 8008 0194-0194, appears to be a record of Ford's regularly conducted business activity.

REQUEST NO. 394

Admit that Exhibit 1967 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 395

Admit that Exhibit 1967 is a business record.

RESPONSE:

Ford denies this request as untrue.

REQUEST NO. 396

Admit that Exhibit 1968 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 397

Admit that Exhibit 1968 is a business record.

RESPONSE:

With the exception of the exhibit sticker that is not present on the original document, Ford admits that the document identified by plaintiffs as Exhibit No. 1968, Bates stamped number 8004 1645-1645, appears to be a record of Ford's regularly conducted business activity.

REQUEST NO. 398

Admit that Exhibit 1969 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 399

Admit that Exhibit 1969 is a business record.

RESPONSE:

With the exception of the exhibit sticker that is not present on the original document, Ford admits that the document identified by plaintiffs as Exhibit No 1969, Bates stamped number 8005 0216-0216, appears to be a record of Ford's regularly conducted business activity.

REQUEST NO. 400

Admit that Exhibit 1970 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 401

Admit that Exhibit 1970 is a business record

RESPONSE:

With the exception of the exhibit sticker, plaintiffs' Bates numbering marginalia and the "PROPERTY OF FORD MOTOR COMPANY" markings that are not present on the original document, Ford admits that the first three pages of the document identified by plaintiffs as Exhibit No. 1970, identified in Ford's collection as Bates stamped numbers 007320-007322 only, appears to be a record of Ford's regularly conducted business activity. Ford denies this request as untrue with respect to the last three pages of Exhibit No. 1970, which appear to be excerpts from the Federal Register.

REQUEST NO. 402

Admit that Exhibit 1971 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 403

Admit that Exhibit 1971 is a business record.

RESPONSE:

With the exception of the exhibit sticker that is not present on the original document, Ford admits that the document identified by plaintiffs as Exhibit No. 1971, Bates stamped numbers 8006 1998-1999, appears to be a record of Ford's regularly conducted business activity.

REQUEST NO. 404

Admit that Exhibit 1972 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 405

Admit that Exhibit 1972 is a business record.

RESPONSE:

With the exception of the exhibit sticker that is not present on the original document, Ford admits that the document identified by plaintiffs as Exhibit No. 1972, Bates stamped numbers 8003 0322-0324, appears to be a record of Ford's regularly conducted business activity.

REQUEST NO. 406

Admit that Exhibit 1973 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 407

Admit that Exhibit 1973 is a business record.

RESPONSE:

Ford denies this request as untrue with respect to Exhibit No. 1973, Bates stamped numbers 8000 0243-0243 and 8000 0245-0246. Ford admits that the document identified by plaintiffs as Exhibit No. 1973, Bates stamped number 8000 0244-0244 only, appears to be a record of Ford's regularly conducted business activity.

REQUEST NO. 408

Admit that Exhibit 1974 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 409

Admit that Exhibit 1974 is a business record.

RESPONSE:

Ford denies this request as untrue.

REQUEST NO. 410

Admit that Exhibit 1975 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 411

Admit that Exhibit 1975 is a business record.

RESPONSE:

With the exception of the exhibit sticker that is not present on the original document, Ford admits that the document identified by plaintiffs as Exhibit No. 1975, Bates stamped numbers 8004 0905-0907 only, appears to be a record of Ford's regularly conducted business activity. Ford denies this request as untrue with respect to Exhibit No. 1975, Bates stamped numbers 8004 0908-0910.

REQUEST NO. 412

Admit that Exhibit 1976 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 413

Admit that Exhibit 1976 is a business record.

RESPONSE:

With the exception of the exhibit sticker that is not present on the original document, Ford admits that the document identified by plaintiffs as Exhibit No. 1976, Bates stamped number 8004 1574-1574, appears to be a record of Ford's regularly conducted business activity.

REQUEST NO. 414

Admit that Exhibit 1977 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 415

Admit that Exhibit 1977 is a business record.

RESPONSE:

With the exception of the exhibit sticker that is not present on the original document, Ford admits that the document identified by plaintiffs as Exhibit No. 1977, Bates stamped number 8008 0169-0169 only, appears to be a record of Ford's regularly conducted business activity. Ford denies this request as untrue with respect to Exhibit No. 1977, Bates stamped numbers 8008 0170-0182.

REQUEST NO. 416

Admit that Exhibit 1978 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 417

Admit that Exhibit 1978 is a business record.

RESPONSE:

With the exception of the exhibit sticker that is not present on the original document, Ford admits that the document identified by plaintiffs as Exhibit No. 1978, Bates stamped numbers 8005 0777-0778, appears to be a record of Ford's regularly conducted business activity.

REQUEST NO. 418

Admit that Exhibit 1979 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 419

Admit that Exhibit 1979 is a business record.

RESPONSE:

With the exception of the exhibit sticker that is not present on the original document, Ford admits that the document identified by plaintiffs as Exhibit No. 1979, Bates stamped number 8000 0234-0234, appears to be a record of Ford's regularly conducted business activity.

REQUEST NO. 420

Admit that Exhibit 1980 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 421

Admit that Exhibit 1980 is a business record.

RESPONSE:

Ford denies this request as untrue

REQUEST NO. 422

Admit that Exhibit 1980 is a public record

RESPONSE:

Ford objects to this request because it seeks information that is available in the public domain. Ford also objects to this request because it requires Ford to conduct a search of information outside of its possession, custody and control to adequately respond. Accordingly, Ford is without current knowledge or information sufficient to admit or deny this request.

REQUEST NO. 423

Admit that Exhibit 1981 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 424

Admit that Exhibit 1981 is a business record.

RESPONSE:

Ford denies this request as untrue.

REQUEST NO. 425

Admit that Exhibit 1982 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 426

Admit that Exhibit 1982 is a business record.

RESPONSE:

With the exception of the exhibit sticker that is not present on the original document, Ford admits that the document identified by plaintiffs as Exhibit No. 1982, Bates stamped numbers 8005 0210-0211 only, appears to be a record of Ford's regularly conducted business activity. With respect to Exhibit No. 1982, Bates stamped number 8005 0209-0209, Ford denies this request as untrue. Ford otherwise objects to this request to the extent that it requests information on a document that is, in part, subject to the attorney client privilege. Ford requests that plaintiffs immediately return the privileged document to Ford.

REQUEST NO. 427

Admit that Exhibit 1983 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 428

Admit that Exhibit 1983 is a business record.

RESPONSE:

After a reasonable inquiry, the information known or readily obtainable to Ford is insufficient to enable Ford to either admit or deny this request.

REQUEST NO. 429

Admit that Exhibit 1984 is an ancient document

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 430

Admit that Exhibit 1984 is a business record.

RESPONSE:

With the exception of the exhibit sticker that is not present on the original document, Ford admits that the document identified by plaintiffs as Exhibit No 1984, Bates stamped numbers 8006 1996-1997, appears to be a record of Ford's regularly conducted business activity.

REQUEST NO. 430

Admit that Exhibit 1985 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 432

Admit that Exhibit 1985 is a business record.

RESPONSE:

With the exception of the exhibit sticker that is not present on the original document, Ford admits that the document identified by plaintiffs as Exhibit No. 1985, Bates stamped number 8006 1995-1995, appears to be a record of Ford's regularly conducted business activity.

REQUEST NO. 433

Admit that Exhibit 1986 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 434

Admit that Exhibit 1986 is a business record.

RESPONSE:

With the exception of the exhibit sticker that is not present on the original document, Ford admits that the document identified by plaintiffs as Exhibit No. 1986, Bates stamped number 8000 0229-0229, appears to be a record of Ford's regularly conducted business activity.

REQUEST NO. 435

Admit that Exhibit 1987 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 436

Admit that Exhibit 1987 is a business record.

RESPONSE:

Ford denies this request as untrue.

REQUEST NO. 437

Admit that Exhibit 1987 is a learned treatise.

RESPONSE:

Ford denies this request as untrue.

REQUEST NO. 438

Admit that Exhibit 1988 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 439

Admit that Exhibit 1988 is a business record.

RESPONSE:

With the exception of the exhibit sticker that is not present on the original document, Ford admits that the document identified by plaintiffs as Exhibit No. 1988, Bates stamped number 8004 1678-1678 only, appears to be a record of Ford's regularly conducted business

activity. Ford denies this request as untrue with respect to Exhibit No 1988, Bates stamped number 8004 1679-1679.

REQUEST NO. 440

Admit that Exhibit 1989 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 441

Admit that Exhibit 1989 is a business record.

RESPONSE:

Ford denies this request as untrue.

REQUEST NO. 442

Admit that Exhibit 1989 is a learned treatise.

RESPONSE:

After a reasonable inquiry, the information known or readily obtainable to Ford is insufficient to enable Ford to either admit or deny this request. Ford can neither admit nor deny this request as written because Exhibit 1989, Bates stamped number 8004 0052-0052, is incomplete.

REQUEST NO. 443

Admit that Exhibit 1990 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 444

Admit that Exhibit 1990 is a business record

RESPONSE:

After a reasonable inquiry, the information known or readily obtainable to Ford is insufficient to enable Ford to either admit or deny this request.

REQUEST NO. 445

Admit that Exhibit 1990 was written by Dr. Roy L. Gealer.

RESPONSE:

Ford objects to this request because it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Ford also objects to this request because, after a reasonable inquiry, the information known or readily obtainable to Ford is insufficient to enable Ford to either admit or deny this request.

REQUEST NO. 446

Admit that Exhibit 1991 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 447

Admit that Exhibit 1991 is a business record.

RESPONSE:

With the exception of the exhibit sticker that is not present on the original document, Ford admits that the document identified by plaintiffs as Exhibit No. 1991, Bates stamped numbers 8005 0769-0770 and 8005 0771-0772, appear to be records of Ford's regularly conducted business activity. After a reasonable inquiry, the information known or readily obtainable to Ford is insufficient to enable Ford to either admit or deny this request with respect to Exhibit No. 1991, Bates stamped number 8005 0773-0773.

REQUEST NO. 448

Admit that Exhibit 1992 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 449

Admit that Exhibit 1992 is a business record.

RESPONSE:

With the exception of the exhibit sticker that is not present on the original document, Ford admits that the document identified by plaintiffs as Exhibit No. 1992, Bates stamped numbers 8004 1685-1686 only, appears to be a record of Ford's regularly conducted business activity. Ford denies this request as untrue with respect to Exhibit No. 1992, Bates stamped numbers 8004 1687-1690.

REQUEST NO. 450

Admit that Exhibit 1993 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 451

Admit that Exhibit 1993 is a business record

RESPONSE:

With the exception of the exhibit sticker that is not present on the original document, Ford admits only that the document identified by plaintiffs as Exhibit No. 1993, Bates stamped number 8005 0121-0121, appears to be a record of Ford's regularly conducted business activity. Ford objects to responding to the remaining part of this request because Ford is unable to identify without undue burden from what Ford shop manuals, if any, the incomplete attachments were obtained to ascertain whether they may constitute a business record. Accordingly, after a reasonable inquiry, Ford is unable to admit or deny any remaining part of this request.

REQUEST NO. 452

Admit that Exhibit 1994 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 453

Admit that Exhibit 1994 is a business record.

RESPONSE:

With the exception of the exhibit sticker that is not present on the original document, Ford admits that the document identified by plaintiffs as Exhibit No. 1994, Bates stamped numbers 8008 0162-0165, appears to be a record of Ford's regularly conducted business activity.

REQUEST NO. 454

Admit that Exhibit 1995 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written

REQUEST NO. 455

Admit that Exhibit 1995 is a business record.

RESPONSE:

With the exception of the exhibit sticker that is not present on the original document, Ford admits that the document identified by plaintiffs as Exhibit No. 1995, Bates stamped numbers 8005 0763-0764, appears to be a record of Ford's regularly conducted business activity.

REQUEST NO. 456

Admit that Exhibit 1996 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written

REQUEST NO. 457

Admit that Exhibit 1996 is a business record.

RESPONSE:

With the exception of the exhibit sticker that is not present on the original document, Ford admits that the document identified by plaintiffs as Exhibit No. 1996, Bates stamped numbers 8006 0436-0439, 8006 0440-0441, and 8006 0442-0443, appear to be records of Ford's regularly conducted business activity.

REQUEST NO. 458

Admit that Exhibit 1997 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 459

Admit that Exhibit 1997 is a business record.

RESPONSE:

Ford denies this request as untrue.

REQUEST NO. 460

Admit that Exhibit 1997 is a public record.

RESPONSE:

Ford objects to this request because it seeks information that is available in the public domain. Ford also objects to this request because it requires Ford to conduct a search of information outside of its possession, custody and control to adequately respond. Accordingly, Ford is without current knowledge or information sufficient to admit or deny this request

REQUEST NO. 461

Admit that Exhibit 1998 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 462

Admit that Exhibit 1998 is a business record.

RESPONSE:

With the exception of the exhibit sticker, plaintiffs' Bates stamping marginalia and "PROPERTY OF FORD MOTOR COMPANY" that are not present on the original document, Ford admits that the document identified by plaintiffs as Exhibit No 1998, identified in Ford's collection as Bates stamped numbers 8001 1197-1206, appears to be a record of Ford's regularly conducted business activity. Ford denies any remaining part of this request as untrue.

REQUEST NO. 463

Admit that Exhibit 1999 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 464

Admit that Exhibit 1999 is a business record.

RESPONSE:

With the exception of the exhibit sticker that is not present on the original document, Ford admits that the document identified by plaintiffs as Exhibit No. 1999, Bates stamped number 8006 1837-1837, appears to be a record of Ford's regularly conducted business activity.

REQUEST NO. 465

Admit that Exhibit 2000 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written

REQUEST NO. 466

Admit that Exhibit 2000 is a business record.

RESPONSE:

With the exception of the exhibit sticker that is not present on the original document, Ford admits that the document identified by plaintiffs as Exhibit No. 2000, Bates stamped numbers 8005 0203-0205, appears to be a record of Ford's regularly conducted business activity.

REQUEST NO. 467

Admit that Exhibit 2001 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 468

Admit that Exhibit 2001 is a business record

RESPONSE:

Ford denies this request as untrue.

REQUEST NO. 469

Admit that Exhibit 2001 is a public record

RESPONSE:

Ford objects to this request because it seeks information that is available in the public domain. Ford also objects to this request because it requires Ford to conduct a search of information outside of its possession, custody and control to adequately respond. Accordingly, Ford is without current knowledge or information sufficient to admit or deny this request.

REQUEST NO. 470

Admit that Exhibit 2002 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 471

Admit that Exhibit 2002 is a business record.

RESPONSE:

Ford denies this request as untrue.

REQUEST NO. 472

Admit that in September 1975, Ford Motor Company was a member of the Automotive Service Industry Association

RESPONSE:

Ford objects to this request as overly broad and unduly burdensome because it would require Ford to poll each and every current and/or past employee to obtain the answer to this request. Moreover, this information is neither relevant to the issues in this lawsuit, nor reasonably calculated to lead to the discovery of admissible evidence.

REQUEST NO. 473

Admit that Exhibit 2003 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 474

Admit that Exhibit 2003 is a business record.

RESPONSE:

With the exception of the exhibit sticker that is not present on the original document, Ford admits that the document identified by plaintiffs as Exhibit No. 2003, Bates stamped number 8004 1702-1702, appears to be a record of Ford's regularly conducted business activity.

REQUEST NO. 475

Admit that Exhibit is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 476

Admit that Exhibit 2004 is a business record.

RESPONSE:

Ford denies this request as untrue.

REQUEST NO. 477

Admit that Exhibit 2005 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 478

Admit that Exhibit 2005 is a business record.

RESPONSE:

With the exception of the exhibit sticker that is not present on the original document, Ford admits that the document identified by plaintiffs as Exhibit No. 2005, Bates stamped numbers 8004 0611-0613, appears to be a record of Ford's regularly conducted business activity.

REQUEST NO. 479

Admit that Exhibit 2006 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 480

Admit that Exhibit 2006 is a business record.

RESPONSE:

After a reasonable inquiry, the information known or readily obtainable to Ford is insufficient to enable Ford to either admit or deny this request.

REQUEST NO. 481

Admit that Exhibit 2007 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 482

Admit that Exhibit 2007 is a business record.

RESPONSE:

With the exception of the exhibit sticker that is not present on the original document, Ford admits that the document identified by plaintiffs as Exhibit No. 2007, Bates stamped number 8004 1703-1703, appears to be a record of Ford's regularly conducted business activity.

REQUEST NO. 483

Admit that Exhibit 2008 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 484

Admit that Exhibit 2008 is a business record

RESPONSE:

Ford denies this request as untrue.

REQUEST NO. 485

Admit that Exhibit 2008 is a public record.

RESPONSE:

Ford objects to this request because it seeks information that is available in the public domain. Ford also objects to this request because it requires Ford to conduct a search of information outside of its possession, custody and control to adequately respond. Accordingly, Ford is without current knowledge or information sufficient to admit or deny this request.

REQUEST NO. 486

Admit that Exhibit 2009 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 487

Admit that Exhibit 2009 is a business record.

RESPONSE:

With the exception of the exhibit sticker that is not present on the original document, Ford admits only that Exhibit No. 2009, Bates stamped numbers 8001 1245-1246, consists of excerpts from a portion of a document that, in its entirety, appears to be a record of Ford's regularly conducted business activity. Ford denies any remaining part of this request as untrue.

REQUEST NO. 488

Admit that Exhibit 2010 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 489

Admit that Exhibit 2010 is a learned treatise.

RESPONSE:

With the exception of the exhibit sticker, Ford admits that Exhibit No. 2010, Bates stamped numbers 8004 1954-1972, is a learned treatise.

REQUEST NO. 490

Admit that Exhibit 2011 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 491

Admit that Exhibit 2011 is a business record.

RESPONSE:

Ford denies this request as untrue.

REQUEST NO. 492

Admit that in December 1975, the Liberty Mutual Insurance Company insured the Ford Motor Company.

RESPONSE:

Ford objects to this request as overly broad, unduly burdensome and neither relevant to the issues in this lawsuit, nor reasonably calculated to lead to the discovery of admissible evidence

REQUEST NO. 493

Admit that Exhibit 2012 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 494

Admit that Exhibit 2012 is a business record.

RESPONSE:

Ford denies this request as untrue.

REQUEST NO. 495

Admit that Exhibit 2013 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 496

Admit that Exhibit 2013 is a business record.

RESPONSE:

With the exception of the exhibit sticker that is not present on the original document, Ford admits that Exhibit No. 2013, Bates stamped numbers 8004 1390-1393, appears to be a record of Ford's regularly conducted business activity.

REQUEST NO. 497

Admit that Exhibit 2014 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 498

Admit that Exhibit 2014 is a business record.

RESPONSE:

Ford denies this request as untrue.

REQUEST NO. 499

Admit that Exhibit 2015 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 500

Admit that Exhibit 2015 is a business record.

RESPONSE:

With the exception of the exhibit sticker that is not present on the original document, Ford admits that the document identified by plaintiffs as Exhibit No. 2015, Bates stamped numbers 8006 1991-1994 appears to be a record of Ford's regularly conducted business activity.

REQUEST NO. 501

Admit that Exhibit 2016 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 502

Admit that Exhibit 2016 is a learned treatise

RESPONSE:

Ford denies this request as untrue.

REQUEST NO. 503

Admit that Exhibit 2017 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 504

Admit that Exhibit 2017 is a business record.

RESPONSE:

Ford denies this request as untrue.

REQUEST NO. 505

Admit that in March 1976, the Ford Motor Company was a member of the Automotive Parts & Accessories Association, Inc

RESPONSE:

Ford objects to this request as overly broad and unduly burdensome because it would require Ford to poll each and every current and/or past employee to obtain the answer to this request. Moreover, this information is neither relevant to the issues in this lawsuit, nor reasonably calculated to lead to the discovery of admissible evidence.

REQUEST NO. 506

Admit that Exhibit 2018 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 507

Admit that Exhibit 2018 is a business record.

RESPONSE:

Ford denies this request as untrue.

REQUEST NO. 508

Admit that Exhibit 2019 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written

REQUEST NO. 509

Admit that Exhibit 2019 is a business record.

RESPONSE:

Ford denies this request as untrue.

REQUEST NO. 510

Admit that in April 1976, the Ford Motor Company was a member of the Automotive Service Councils, Inc.

RESPONSE:

Ford objects to this request as overly broad and unduly burdensome because it would require Ford to poll each and every current and/or past employee to obtain the answer to this request. Moreover, this information is neither relevant to the issues in this lawsuit, nor reasonably calculated to lead to the discovery of admissible evidence.

REQUEST NO. 511

Admit that Exhibit 2020 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 512

Admit that Exhibit 2020 is a business record.

RESPONSE:

Ford denies this request as untrue.

REQUEST NO. 513

Admit that in May 1976, Ford Motor Company subscribed to the publication Northwest Motor.

RESPONSE:

Ford objects to this request as overly broad and unduly burdensome because it would require Ford to poll each and every current and/or past employee to obtain the answer to this request. Moreover, this information is neither relevant to the issues in this lawsuit, nor reasonably calculated to lead to the discovery of admissible evidence.

REQUEST NO. 514

Admit that Exhibit 2021 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 515

Admit that Exhibit 2021 is a business record.

RESPONSE:

Ford denies this request as untrue.

REQUEST NO. 516

Admit that Exhibit 2021 is a public record.

RESPONSE:

Ford objects to this request because it seeks information that is available in the public domain. Ford also objects to this request because it requires Ford to conduct a search of information outside of its possession, custody and control to adequately respond. Accordingly, Ford is without current knowledge or information sufficient to admit or deny this request.

REQUEST NO. 517

Admit that Exhibit 2022 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written

REQUEST NO. 518

Admit that Exhibit 2022 is a business record.

RESPONSE:

With the exception of the exhibit sticker that is not present on the original document, Ford admits that the document identified by plaintiffs as Exhibit No. 2022, Bates stamped number 8005 0529-0529, appears to be a record of Ford's regularly conducted business activity.

REQUEST NO. 519

Admit that Exhibit 2023 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 520

Admit that Exhibit 2023 is a learned treatise.

RESPONSE:

With the exception of the exhibit sticker, Ford admits that Exhibit No. 2023, Bates stamped numbers 8001 0003-0014, is a learned treatise.

REQUEST NO. 521

Admit that Exhibit 2024 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 522

Admit that Exhibit 2024 is a business record.

RESPONSE:

With the exception of the exhibit sticker and "PROPERTY OF FORD MOTOR COMPANY" that are not present on the original document, Ford admits only that Exhibit No. 2024 consists of excerpts from a portion of a document identified in Ford's collection as Bates stamped numbers 8010 0288-0289 that, in its entirety, appears to be a record of Ford's regularly conducted business activity. Ford denies any remaining part of this request as untrue.

REQUEST NO. 523

Admit that Exhibit 2025 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 524

Admit that Exhibit 2025 is a business record.

RESPONSE:

With the exception of the exhibit sticker that is not present on the original document, Ford admits only that Exhibit No. 2025, Bates stamped numbers 8002 1294-1296, consists of an incomplete document that is missing one attachment that would otherwise appear to be a record of Ford's regularly conducted business activity. Ford denies any remaining part of this request as untrue.

REQUEST NO. 525

Admit that Exhibit 2026 as an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 526

Admit that Exhibit 2026 is a business record.

RESPONSE:

With the exception of the exhibit sticker that is not present on the original document, Ford admits that the document identified by plaintiffs as Exhibit No. 2026, Bates stamped numbers 8005 0517-0519, appears to be a record of Ford's regularly conducted business activity.

REQUEST NO. 527

Admit that Exhibit 2027 is an ancient document

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 528

Admit that Exhibit 2027 is a business record.

RESPONSE:

With the exception of the exhibit sticker that is not present on the original document, Ford admits that the documents identified by plaintiffs as Exhibit No. 2027, Bates stamped numbers 8004 1382-1389, appears to be a record, or excerpts from records, of Ford's regularly conducted business activity.

REQUEST NO. 529

Admit that Exhibit 2028 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 530

Admit that Exhibit 2028 is a learned treatise.

RESPONSE:

With the exception of the exhibit sticker, Ford admits that Exhibit No. 2028, Bates stamped numbers 8001 0015-0020, is a learned treatise.

REQUEST NO. 531

Admit that Exhibit 2029 as an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 532

Admit that Exhibit 2029 is a business record.

RESPONSE:

With the exception of the exhibit sticker that is not present on the original document, Ford admits that the document identified by plaintiffs as Exhibit No. 2029, Bates stamped numbers 8002 0026-0027, appears to be a record of Ford's regularly conducted business activity.

REQUEST NO. 533

Admit that Exhibit 2030 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 534

Admit that Exhibit 2030 is a business record.

RESPONSE:

With the exception of the exhibit sticker that is not present on the original document, Ford admits that the document identified by plaintiffs as Exhibit No. 2030, Bates stamped numbers 8005 0743-0744, appears to be a record of Ford's regularly conducted business activity.

REQUEST NO. 535

Admit that Exhibit 2031 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 536

Admit that Exhibit 2031 is a business record.

RESPONSE:

With the exception of the exhibit sticker that is not present on the original document, Ford admits that the document identified by plaintiffs as Exhibit No 2031, Bates stamped numbers 8001 1666-1669, appears to be a record of Ford's regularly conducted business activity.

REQUEST NO. 537

Admit that Exhibit 2032 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 538

Admit that Exhibit 2032 is a business record.

RESPONSE:

With the exception of the exhibit sticker that is not present on the original document, Ford admits that the document identified by plaintiffs as Exhibit No. 2032, Bates stamped numbers 8001 1662-1665, appears to be a record of Ford's regularly conducted business activity.

REQUEST NO. 539

Admit that Exhibit 2033 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written. Regardless, plaintiffs did not provide Ford with a copy of this document so Ford is without current knowledge or information sufficient to admit or deny this request.

REQUEST NO. 540

Admit that Exhibit 2033 is a business record.

RESPONSE:

Plaintiffs did not provide Ford with a copy of this document so Ford is without current knowledge or information sufficient to admit or deny this request.

REQUEST NO. 541

Admit that Exhibit 2034 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 542

Admit that Exhibit 2034 is a business record.

RESPONSE:

With the exception of the exhibit sticker that is not present on the original document, Ford admits that the document identified by plaintiffs as Exhibit No. 2034, Bates stamped numbers 8002 1935-1939, appears to be a record of Ford's regularly conducted business activity.

REQUEST NO. 543

Admit that Exhibit 2035 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 544

Admit that Exhibit 2035 is a business record.

RESPONSE:

With the exception of the exhibit sticker that is not present on the original document, Ford admits that the document identified by plaintiffs as Exhibit No. 2035, Bates stamped numbers 8002 1646-1652, appears to be a record of Ford's regularly conducted business activity.

REQUEST NO. 545

Admit that Exhibit 2036 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 546

Admit that Exhibit 2036 is a business record.

RESPONSE:

With the exception of the exhibit sticker that is not present on the original document, Ford admits that the document identified by plaintiffs as Exhibit No. 2036, Bates stamped numbers 8005 0431-0432 and 8005 0433-0434, appear to be records of Ford's regularly conducted business activity

REQUEST NO. 547

Admit that Exhibit 2037 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 548

Admit that Exhibit 2037 is a business record.

RESPONSE:

With the exception of the exhibit sticker that is not present on the original document, Ford admits that the document identified by plaintiffs as Exhibit No. 2037, Bates stamped numbers 8002 1629-1631, appears to be a record of Ford's regularly conducted business activity.

REQUEST NO. 549

Admit that Exhibit 2038 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 550

Admit that Exhibit 2038 is a learned treatise.

RESPONSE:

Ford denies this request as untrue.

REQUEST NO. 551

Admit that Exhibit 2039 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 552

Admit that Exhibit 2039 is a business record.

RESPONSE:

With the exception of the exhibit sticker that is not present on the original document, Ford admits only that Exhibit No. 2039, Bates stamped numbers 8001 1647-1648, consists of an incomplete document without an attachment that would otherwise appear to be a record of Ford's regularly conducted business activity. Ford denies any remaining part of this request as untrue.

REQUEST NO. 553

Admit that Exhibit 2040 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 554

Admit that Exhibit 2040 is a business record.

RESPONSE:

With the exception of the exhibit sticker that is not present on the original document, Ford admits that the document identified by plaintiffs as Exhibit No. 2040, Bates stamped numbers 8001 1645-1646, appears to be a record of Ford's regularly conducted business activity.

REQUEST NO. 555

Admit that Exhibit 2041 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written

REQUEST NO. 556

Admit that Exhibit 2041 is a business record.

RESPONSE:

With the exception of the exhibit sticker that is not present on the original document, Ford admits that the document identified by plaintiffs as Exhibit No. 2041, Bates stamped

numbers 8001 1627-1627, 8001 1628-1628, and 8001 1629-1629, appear to be records of Ford's regularly conducted business activity.

REQUEST NO. 557

Admit that Exhibit 2042 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 558

Admit that Exhibit 2042 is a business record.

RESPONSE:

With the exception of the exhibit sticker that is not present on the original document, Ford admits that the document identified by plaintiffs as Exhibit No. 2042, Bates stamped number 8002 1701-1701, appears to be a record of Ford's regularly conducted business activity.

REQUEST NO. 559

Admit that Exhibit 2043 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 560

Admit that Exhibit 2043 is a business record.

RESPONSE:

With the exception of the exhibit sticker that is not present on the original document, Ford admits that the document identified by plaintiffs as Exhibit No. 2043, Bates stamped numbers 8001 1623-1625, appears to be a record of Ford's regularly conducted business activity.

REQUEST NO. 561

Admit that Exhibit 2044 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 562

Admit that Exhibit 2044 is a business record.

RESPONSE:

With the exception of the exhibit sticker that is not present on the original document, Ford admits that the document identified by plaintiffs as Exhibit No. 2044, Bates stamped numbers 8001 1619-1620, appears to be a record of Ford's regularly conducted business activity.

REQUEST NO. 563

Admit that Exhibit 2045 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 564

Admit that Exhibit 2045 is a business record.

RESPONSE:

With the exception of the exhibit sticker that is not present on the original document, Ford admits that the document identified by plaintiffs as Exhibit No. 2045, Bates stamped number 8001 1615-1615, appears to be a record of Ford's regularly conducted business activity.

REQUEST NO. 565

Admit that Exhibit 2046 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 566

Admit that Exhibit 2046 is a business record.

RESPONSE:

With the exception of the exhibit sticker that is not present on the original document, Ford admits that the document identified by plaintiffs as Exhibit No. 2046, Bates stamped number 8001 1609-1609, appears to be a record of Ford's regularly conducted business activity.

REQUEST NO. 567

Admit that Exhibit 2047 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 568

Admit that Exhibit 2047 is a business record.

RESPONSE:

With the exception of the exhibit sticker that is not present on the original document, Ford admits that the document identified by plaintiffs as Exhibit No. 2047, Bates stamped numbers 8001 1600-1608, appears to be a record of Ford's regularly conducted business activity.

REQUEST NO. 569

Admit that Exhibit 2048 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written

REQUEST NO. 570

Admit that Exhibit 2048 is a business record.

RESPONSE:

With the exception of the exhibit sticker that is not present on the original document, Ford admits that the document identified by plaintiffs as Exhibit No. 2048, Bates stamped numbers 8003 1866-1870, appears to be a record of Ford's regularly conducted business activity.

REQUEST NO. 571

Admit that Exhibit 2049 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written

REQUEST NO. 572

Admit that Exhibit 2049 is a business record.

RESPONSE:

With the exception of the exhibit sticker that is not present on the original document, Ford admits that the document identified by plaintiffs as Exhibit No. 2049, Bates stamped numbers 8002 1940-1948, appears to be a record of Ford's regularly conducted business activity.

REQUEST NO. 573

Admit that Exhibit 2050 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 574

Admit that Exhibit 2050 is a business record.

RESPONSE:

With the exception of the exhibit sticker that is not present on the original document, Ford admits that the document identified by plaintiffs as Exhibit No. 2050, Bates stamped numbers 8006 1975-1990, appears to be a record of Ford's regularly conducted business activity.

REQUEST NO. 575

Admit that Exhibit 2051 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 576

Admit that Exhibit 2051 is a business record.

RESPONSE:

After a reasonable inquiry, the information known or readily obtainable to Ford is insufficient to enable Ford to either admit or deny this request with respect to Exhibit No. 2051, Bates stamped number 8001 1251-1251 only. Ford admits that the document identified by plaintiffs as Exhibit No. 2051, Bates stamped numbers 8001 1252-1258 only, appears to be an incomplete record of Ford's regularly conducted business activity. Ford denies any remaining part of this request as untrue.

REQUEST NO. 577

Admit that Exhibit 2052 is an ancient document

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 578

Admit that Exhibit 2052 is a business record.

RESPONSE:

Ford denies this request as untrue

REQUEST NO. 579

Admit that you received Exhibit 2052 in the ordinary course of business.

RESPONSE:

Ford objects to this request 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. Ford also objects to this request because, after a reasonable inquiry, the information known or readily obtainable to Ford is insufficient to enable Ford to either admit or deny this request.

REQUEST NO. 580

Admit that Exhibit 2053 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 581

Admit that Exhibit 2053 is a business record.

RESPONSE:

With the exception of the exhibit sticker that is not present on the original document, Ford admits that the document identified by plaintiffs as Exhibit No. 2053, Bates stamped numbers 8002 0030-0031, appears to be a record of Ford's regularly conducted business activity.

REQUEST NO. 582

Admit that Exhibit 2054 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 583

Admit that Exhibit 2054 is a business record.

RESPONSE:

With the exception of the exhibit sticker that is not present on the original document, Ford admits that the document identified by plaintiffs as Exhibit No. 2054, Bates stamped numbers 8001 1592-1594 only, appears to be a record of Ford's regularly conducted business activity. Ford denies this request as untrue with respect to Exhibit No. 2054, Bates stamped number 8001 1595-1595.

REQUEST NO. 584

Admit that Exhibit 2055 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 585

Admit that Exhibit 2055 is a business record.

RESPONSE:

With the exception of the exhibit sticker that is not present on the original document, Ford admits that the document identified by plaintiffs as Exhibit No. 2055, Bates stamped number 8001 0628-0628, appears to be a record of Ford's regularly conducted business activity.

REQUEST NO. 586

Admit that Exhibit 2056 is an ancient document

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 587

Admit that Exhibit 2056 is a business record.

RESPONSE:

With the exception of the exhibit sticker that is not present on the original document, Ford admits that the document identified by plaintiffs as Exhibit No 2056, Bates stamped numbers 8003 0813-0831, appears to be a record of Ford's regularly conducted business activity.

REQUEST NO. 588

Admit that Exhibit 2057 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 589

And at that Exhibit 2057 is a business record.

RESPONSE:

Ford denies this request as untrue.

REQUEST NO. 590

Admit that Exhibit 2057 is learned treatise.

RESPONSE:

Ford denies this request as untrue.

REQUEST NO. 591

Admit that Exhibit 2058 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 592

Admit that Exhibit 2058 is a public record

RESPONSE:

Ford objects to this request because it seeks information that is available in the public domain. Ford also objects to this request because it requires Ford to conduct a search of information outside of its possession, custody and control to adequately respond. Accordingly, Ford is without current knowledge or information sufficient to admit or deny this request.

REQUEST NO. 593

Admit that Exhibit 2059 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written

REQUEST NO. 594

Admit that Exhibit 2059 is a business record.

RESPONSE:

With the exception of the exhibit sticker that is not present on the original document, Ford admits that the document identified by plaintiffs as Exhibit No. 2059, Bates stamped numbers 8006 0677-0679, appears to be a record of Ford's regularly conducted business activity.

REQUEST NO. 595

Admit that Exhibit 2060 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 596

Admit that Exhibit 2060 is a business record.

RESPONSE:

With the exception of the exhibit sticker that is not present on the original document, Ford admits that the document identified by plaintiffs as Exhibit No. 2060, Bates stamped number 8001 0631-0631 only, appears to be a record of Ford's regularly conducted business activity. Ford denies this request as untrue with respect to Exhibit No. 2060, Bates stamped numbers 8001 0632-0645.

REQUEST NO. 597

Admit that Exhibit 2061 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 598

Admit that Exhibit 2061 is a business record.

RESPONSE:

With the exception of the exhibit sticker that is not present on the original document, Ford admits that the document identified by plaintiffs as Exhibit No. 2061, Bates stamped numbers 8001 1585-1586, appears to be a record of Ford's regularly conducted business activity.

REQUEST NO. 599

Admit that Exhibit 2062 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 600

Admit that Exhibit 2062 is a business record

RESPONSE:

With the exception of the exhibit sticker that is not present on the original document, Ford admits that the document identified by plaintiffs as Exhibit No. 2062, Bates stamped number 8007 1234-1234, appears to be a record of Ford's regularly conducted business activity.

REQUEST NO. 601

Admit that Exhibit 2063 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 602

Admit that Exhibit 2063 is a business record.

RESPONSE:

With the exception of the exhibit sticker that is not present on the original document, Ford admits that the document identified by plaintiffs as Exhibit No. 2063, Bates stamped numbers 8002 1663-1665, appears to be a record of Ford's regularly conducted business activity.

REQUEST NO. 603

Admit that Exhibit 2064 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 604

Admit that Exhibit 2064 is a business record.

RESPONSE:

Ford denies this request as untrue.

REQUEST NO. 605

Admit that you received Exhibit 2064 in the ordinary course of business.

RESPONSE:

Ford objects to this request 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. Ford also objects to this request because, after a reasonable inquiry, the information known or readily obtainable to Ford is insufficient to enable Ford to either admit or deny this request.

REQUEST NO. 606

Admit that Thiokol Corporation supplied asbestos containing friction materials to you for use in Ford vehicles.

RESPONSE:

Ford objects to this request because it is overly broad and seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Ford also objects to this request because it is not reasonably tailored to the alleged vehicles and components at issue in this lawsuit.

REQUEST NO. 607

Admit that Exhibit 2065 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 608

Admit that Exhibit 2065 is a business record.

RESPONSE:

With the exception of the exhibit sticker that is not present on the original document, Ford admits that the document identified by plaintiffs as Exhibit No. 2065, Bates stamped numbers 8005 0708-0710 and 8005 0711-0718, appear to be records of Ford's regularly conducted business activity.

REQUEST NO. 609

Admit that Exhibit 2066 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 610

Admit that Exhibit 2066 is a business record.

RESPONSE:

With the exception of the exhibit sticker that is not present on the original document and the handwritten marginalia, Ford admits only that Exhibit No. 2066, Bates stamped number 8003 0725-0725, consists of excerpts from a portion of the 1979 Car Shop Manual Chassis Volume 1 and that the manual, in its entirety, appears to be a record of Ford's regularly conducted business activity. After a reasonable inquiry, the information known or readily obtainable to Ford is insufficient to enable Ford to either admit or deny this request as it relates to Exhibit No. 2066, Bates stamped number 8003 0726-0726. With respect to Exhibit No. 2066, Bates stamped number 8003 0727-0727, and with the exception of the handwritten marginalia, Ford admits only that this page consists of excerpts from a portion of the 1980 Body/Chassis/Electrical Shop

Manual and that the manual, in its entirety, appears to be a record of Ford's regularly conducted business activity. Ford denies any remaining part of this request as untrue.

REQUEST NO. 611

Admit that Exhibit 2066 is the Drum Brake section of the 1979 Ford Car Shop Manual.

RESPONSE:

With the exception of the exhibit sticker that is not present on the original document and the handwritten marginalia, Ford admits only that Exhibit No 2066, Bates stamped number 8003 0725-0725, consists of excerpts from a portion of the 1979 Car Shop Manual Chassis Volume 1 entitled "Drum Brakes, Single Cylinder, Dual Piston." Ford denies any remaining part of this request as untrue.

REQUEST NO. 612

Admit that Exhibit 2067 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 613

Admit that Exhibit 2067 is a business record.

RESPONSE:

After a reasonable inquiry, the information known or readily obtainable to Ford is insufficient to enable Ford to either admit or deny this request.

REQUEST NO. 614

Admit that Exhibit 2068 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 615

Admit that Exhibit 2068 is a business record.

RESPONSE:

With the exception of the exhibit sticker that is not present on the original document, Ford admits that the document identified by plaintiffs as Exhibit No. 2068, Bates stamped numbers 8007 1216-1217 only, appears to be a record of Ford's regularly conducted business activity. With respect to Exhibit No. 2068, Bates stamped numbers 8007 1218-1222, Ford denies this request as untrue.

REQUEST NO. 616

Admit that Exhibit 2069 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 617

Admit that Exhibit 2069 is a business record.

RESPONSE:

With the exception of the exhibit sticker that is not present on the original document, Ford admits only that Exhibit No. 2069, Bates stamped number 8006 1965-1965, consists of an

incomplete document without attachments that would otherwise appear to be a record of Ford's regularly conducted business activity. Ford denies any remaining part of this request as untrue.

REQUEST NO. 618

Admit that Exhibit 2070 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 619

Admit that Exhibit 2070 is a business record

RESPONSE:

With the exception of the exhibit sticker that is not present on the original document, Ford admits that the document identified by plaintiffs as Exhibit No. 2070, Bates stamped numbers 8001 1560-1566, appears to be a record of Ford's regularly conducted business activity.

REQUEST NO. 620

Admit that Exhibit 2071 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 621

Admit that Exhibit 2071 is a business record.

RESPONSE:

With the exception of the exhibit sticker that is not present on the original document, Ford admits that the document identified by plaintiffs as Exhibit No. 2071, Bates stamped number 8008 0101-0101, appears to be a record of Ford's regularly conducted business activity.

REQUEST NO. 622

Admit that Exhibit 2072 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 623

Admit that Exhibit 2072 is a business record.

RESPONSE:

With the exception of the exhibit sticker that is not present on the original document, Ford admits that the document identified by plaintiffs as Exhibit No. 2072, Bates stamped numbers 8003 0139-0140, appears to be a record of Ford's regularly conducted business activity.

REQUEST NO. 624

Admit that Exhibit 2073 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 625

Admit that Exhibit 2073 is a business record.

RESPONSE:

With the exception of the exhibit sticker that is not present on the original document, Ford admits that the document identified by plaintiffs as Exhibit No. 2073, Bates stamped numbers 8006 0027-0028, appears to be a record of Ford's regularly conducted business activity.

REQUEST NO. 626

Admit that Exhibit 2074 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written

REQUEST NO. 627

Admit that Exhibit 2074 is a business record.

RESPONSE:

Ford denies this request as untrue.

REQUEST NO. 628

Admit that Exhibit 2075 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 629

Admit that Exhibit 2075 is a business record.

RESPONSE:

With the exception of the exhibit sticker that is not present on the original document, Ford admits that the document identified by plaintiffs as Exhibit No. 2075, Bates stamped numbers 8008 0137-0138, appears to be a record of Ford's regularly conducted business activity.

REQUEST NO. 630

Admit that Exhibit 2076 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 631

Admit that Exhibit 2076 is a business record.

RESPONSE:

With the exception of the exhibit sticker that is not present on the original document, Ford admits that the document identified by plaintiffs as Exhibit No. 2076, Bates stamped numbers 8003 0767-0782, appears to be a record of Ford's regularly conducted business activity.

REQUEST NO. 632

Admit that Exhibit 2077 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 633

Admit that Exhibit 2077 is a business record

RESPONSE:

Ford denies this request as untrue.

REQUEST NO. 634

Admit that in May 1979 you subscribed to Automotive Industries.

RESPONSE:

Ford objects to this request as overly broad and unduly burdensome because it would require Ford to poll each and every current and/or past employee to obtain the answer to this request. Moreover, this information is neither relevant to the issues in this lawsuit, nor reasonably calculated to lead to the discovery of admissible evidence.

REQUEST NO. 635

Admit that Exhibit 2078 is an ancient document

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 636

Admit that Exhibit 2078 is a business record.

RESPONSE:

With the exception of the exhibit sticker that is not present on the original document, Ford admits that the document identified by plaintiffs as Exhibit No. 2078, Bates stamped numbers 8007 1224-1228, appears to be a record of Ford's regularly conducted business activity.

REQUEST NO. 637

Admit that Exhibit 2079 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 638

Admit that Exhibit 2079 is a business record.

RESPONSE:

With the exception of the exhibit sticker that is not present on the original document, Ford admits that the document identified by plaintiffs as Exhibit No 2079, Bates stamped numbers 8007 0513-0514, appears to be a record of Ford's regularly conducted business activity.

REQUEST NO. 639

Admit that Exhibit 2080 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 640

Admit that Exhibit 2080 is a business record.

RESPONSE:

With the exception of the exhibit sticker that is not present on the original document, Ford admits that the document identified by plaintiffs as Exhibit No. 2080, Bates stamped numbers 8006 2119-2120, appears to be a record of Ford's regularly conducted business activity.

REQUEST NO. 641

Admit that Exhibit 2081 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 642

Admit that Exhibit 2081 is a business record

RESPONSE:

With the exception of the exhibit sticker that is not present on the original document, Ford admits that the document identified by plaintiffs as Exhibit No. 2081, Bates stamped numbers 8006 0694-0695, appears to be a record of Ford's regularly conducted business activity.

REQUEST NO. 643

Admit that Exhibit 2082 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 644

Admit that Exhibit 2082 is a business record.

RESPONSE:

With the exception of the exhibit sticker that is not present on the original document, Ford admits that the document identified by plaintiffs as Exhibit No. 2082, Bates stamped number 8005 0419-0419 only, appears to be a record of Ford's regularly conducted business

activity. Ford denies this request as untrue with respect to Exhibit No. 2082, Bates stamped number 8005 0420-0420.

REQUEST NO. 645

Admit that Exhibit 2083 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 646

Admit that Exhibit 2083 is a business record.

RESPONSE:

With the exception of the exhibit sticker that is not present on the original document and the marginalia, Ford admits that the documents identified by plaintiffs as Exhibit No. 2083, Bates stamped numbers 8002 1371-1372, 8002 1373-1378, 8002 1379-1383, 8002 1384-1384, 802 1385-1385, 8002 1399-1399, 8002 1400-1400, 8002 1401-1403, 8002 1404-1405, 8002 1424-1424, 8002 1503-1503, 8002 1504-1504, 8002 1509-1509, 8002 1510-1511, 8002 1512-1512, 8002 1513-1513, 8002 1514-1514, 8002 1515-1521, 004098-004103, 8002 1522-1522, 8002 1523-1523, 8002 1524-1524, 8002 1530-1531, 8002 1532-1532, 8002 1533-1535, 8002 1536-1536, 8002 1537-1539 8002 1540-1541, 8002 1542-1544, 8002 1545-1546 8002 1547-1547, 8002 1548-1548, 8002 1549-1549, 8002 1551and 1554, 8002 1552-1553, 8002 1555-1563, 8002 1564-1569, 8002 1570-1570, 8002 1571-1573, 8002 1574-1577, 8002 1578-1581, 8002 1582-1582, 8002 1583-1583, 8002 1584-1584 8002 1585-1592, 8002 1593-1594 8002 1595-1596, 8002 1597-1607 (document boundaries unknown), 8002 1610-1613, 8002 1614-

1617, and 8002 1618-1619 only, appear to be records or excerpts of records, some of which are without attachments, of Ford's regularly conducted business activity. Ford denies this request as untrue with respect to Exhibit No. 2083, Bates stamped numbers 8002 1386-1398, 8002 1406-1423, 8002 1425-1502, 8002 1505-1508, 8002 1525-1529, 8002 1550-1550, 8002 1608-1609 and 8002 1620-1621. Ford denies any remaining part of this request as untrue.

REQUEST NO. 647

Admit that Exhibit 2083, the "Asbestos Background File", was compiled by a Ford employee in the ordinary course of business.

RESPONSE:

Ford objects to this request 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. Ford also objects to this request because, after a reasonable inquiry, the information known or readily obtainable to Ford is insufficient to enable Ford to either admit or deny this request.

REQUEST NO. 648

Admit that the documents contained in Exhibit 2083 were written and/or received by Ford in the ordinary course of business.

RESPONSE:

Ford objects to this request 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. Ford also objects to this request because, after a reasonable inquiry, the information known or readily obtainable to Ford is insufficient to enable Ford to either admit or deny this request.

REQUEST NO. 649

Admit the documents contained in Exhibit 2083 were found in the records and files of the Ford Motor Company.

RESPONSE:

Based upon information currently known to Ford, Ford admits this request.

REQUEST NO. 650

Admit that Exhibit 2084 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 651

Admit that Exhibit 2084 is a business record.

RESPONSE:

With the exception of the exhibit sticker that is not present on the original document, Ford admits that the document identified by plaintiffs as Exhibit No. 2084, Bates stamped numbers 8001 1288-1298 appears to be a record of Ford's regularly conducted business activity. With respect to Exhibit No. 2084, Bates stamped number 8003 1924-1924, Ford admits that this appears to be a page from a document that may be a record of Ford's regularly conducted business activity. Ford denies any remaining part of this request as untrue.

REQUEST NO. 652

Admit that Exhibit 2085 is an ancient document

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 653

Admit that Exhibit 2085 is a business record.

RESPONSE:

With the exception of the exhibit sticker that is not present on the original document, Ford admits that the document identified by plaintiffs as Exhibit No. 2085, Bates stamped number 8001 1433-1433 only, appears to be a record of Ford's regularly conducted business activity. Ford denies this request as untrue with respect to Exhibit No. 2085, Bates stamped numbers 8001 1434-1446.

REQUEST NO. 654

Admit that Exhibit 2086 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 655

Admit that Exhibit 2086 is a business record.

RESPONSE:

With the exception of the exhibit sticker that is not present on the original document, Ford admits that the document identified by plaintiffs as Exhibit No. 2086, Bates stamped numbers 8001 1430-1432, appears to be a record of Ford's regularly conducted business activity.

REQUEST NO. 656

Admit that Exhibit 2087 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 657

Admit that Exhibit 2087 is a business record.

RESPONSE:

With the exception of the exhibit sticker that is not present on the original document, Ford admits that the document identified by plaintiffs as Exhibit No. 2087, Bates stamped number 8001 1549-1549 only, appears to be a record of Ford's regularly conducted business activity. Ford denies this request as untrue with respect to Exhibit No. 2087, Bates stamped numbers 8001 1550-1553.

REQUEST NO. 658

Admit that Exhibit 2088 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 659

Admit that Exhibit 2088 is a business record

RESPONSE:

With the exception of the exhibit sticker that is not present on the original document, Ford admits that the document identified by plaintiffs as Exhibit No. 2088, Bates stamped numbers 8003 0802-0804, appears to be a record of Ford's regularly conducted business activity.

REQUEST NO. 660

Admit that Exhibit 2089 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 661

Admit that Exhibit 2089 is a business record.

RESPONSE:

With the exception of the exhibit sticker that is not present on the original document, Ford admits that the document identified by plaintiffs as Exhibit No. 2089, Bates stamped number 8005 0683-0683, appears to be a record of Ford's regularly conducted business activity.

REQUEST NO. 662

Admit that Exhibit 2090 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 663

Admit that Exhibit 2090 is a business record.

RESPONSE:

With the exception of the exhibit sticker that is not present on the original document, Ford admits that the document identified by plaintiffs as Exhibit No. 2090, Bates stamped numbers 8003 1039-1042, appears to be a record of Ford's regularly conducted business activity.

REQUEST NO. 664

Admit that Exhibit 2091 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 665

Admit that Exhibit 2091 is a business record.

RESPONSE:

Ford objects to this request to the extent that it is overly broad, and seeks information that is neither relevant to the issues in this lawsuit, nor reasonably calculated to lead to the discovery of admissible evidence. Further, Ford objects to this request because it seeks information in violation of Ford's constitutional right to lobby the government. This information is exempt from discovery under the line of cases known as the "Noerr Pennington doctrine" as expressed in *In re Burlington Northern*, 822 F. 2d 518 (5th Cir. 1987).

REQUEST NO. 666

Admit that Exhibit 2092 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 667

Admit that Exhibit 2092 is a business record.

RESPONSE:

With the exception of the exhibit sticker that is not present on the original document, Ford admits that the document identified by plaintiffs as Exhibit No. 2092, Bates stamped number 8008 0258-0258, appears to be a record of Ford's regularly conducted business activity

REQUEST NO. 668

Admit that Exhibit 2093 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 669

Admit that Exhibit 2093 is a business record.

RESPONSE:

With the exception of the exhibit sticker that is not present on the original document, Ford admits that the document identified by plaintiffs as Exhibit No. 2093, Bates stamped numbers 8006 0673-0674, appears to be a record of Ford's regularly conducted business activity.

REQUEST NO. 670

Admit that Exhibit 2094 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 671

Admit that Exhibit 2094 is a business record.

RESPONSE:

After a reasonable inquiry, the information known or readily obtainable to Ford is insufficient to enable Ford to either admit or deny this request.

REQUEST NO. 672

Admit that Exhibit 2095 is an ancient document

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 673

Admit that Exhibit 2095 is a business record.

RESPONSE:

With the exception of the exhibit sticker that is not present on the original document, Ford admits that the document identified by plaintiffs as Exhibit No. 2095, Bates stamped numbers 8004 0428-0429, appears to be a record of Ford's regularly conducted business activity.

REQUEST NO. 674

Admit that Exhibit 2096 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 675

Admit that Exhibit 2096 is a business record.

RESPONSE:

With the exception of the exhibit sticker that is not present on the original document, Ford admits that the document identified by plaintiffs as Exhibit No. 2096, Bates stamped numbers 8003 1007-1008, appears to be a record of Ford's regularly conducted business activity.

REQUEST NO. 676

Admit that Exhibit 2097 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 677

Admit that Exhibit 2097 is a business record.

RESPONSE:

With the exception of the exhibit sticker that is not present on the original document, Ford admits that the document identified by plaintiffs as Exhibit No. 2097, Bates stamped numbers 8003 1794-1836, appears to be a record of Ford's regularly conducted business activity.

REQUEST NO. 678

Admit that Exhibit 2098 is an ancient document

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 679

Admit that Exhibit 2098 is a business record.

RESPONSE:

With the exception of the exhibit sticker that is not present on the original document, Ford admits that the document identified by plaintiffs as Exhibit No. 2098, Bates stamped numbers 8007 1530-1532, appears to be a record of Ford's regularly conducted business activity.

REQUEST NO. 680

Admit that Exhibit 2099 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written

REQUEST NO. 681

Admit that Exhibit 2099 is a business record.

RESPONSE:

Ford denies this request as untrue.

REQUEST NO. 682

Admit that in February 1980, Ford Motor Company was a member of the National Safety Council.

RESPONSE:

Based on information currently known to Ford, Ford admits this request.

REQUEST NO. 683

Admit that Exhibit 2100 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 684

Admit that Exhibit 2100 is a business record.

RESPONSE:

With the exception of the exhibit sticker that is not present on the original document, Ford admits that the document identified by plaintiffs as Exhibit No. 2100, Bates stamped numbers 8006 0546-0547, appears to be a record of Ford's regularly conducted business activity.

REQUEST NO. 685

Admit that Exhibit 2101 is an ancient document

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 686

Admit that Exhibit 2101 is a business record.

RESPONSE:

Ford denies this request as untrue.

REQUEST NO. 687

Admit that Exhibit 2102 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 688

Admit that Exhibit 2102 is a business record.

RESPONSE:

With the exception of the exhibit sticker that is not present on the original document, Ford admits only that Exhibit No. 2102, Bates stamped numbers 8006 0541-0545, consists of an incomplete document that would, in its entirety, appear to be a record of Ford's regularly conducted business activity. Ford denies any remaining part of this request as untrue.

REQUEST NO. 689

Admit that Exhibit 2103 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written

REQUEST NO. 690

Admit that Exhibit 2103 is a business record

RESPONSE:

With the exception of the exhibit sticker that is not present on the original document, Ford admits that the document identified by plaintiffs as Exhibit No. 2103, Bates stamped number 8003 1769-1769, appears to be a record of Ford's regularly conducted business activity.

REQUEST NO. 691

Admit that Exhibit 2104 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 692

Admit that Exhibit 2104 is a business record.

RESPONSE:

With the exception of the exhibit sticker that is not present on the original document, Ford admits that the document identified by plaintiffs as Exhibit No. 2104, Bates stamped numbers 8003 0868-0876, appears to be a record of Ford's regularly conducted business activity.

REQUEST NO. 693

Admit that Exhibit 2105 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 694

Admit that Exhibit 2105 is a business record

RESPONSE:

With the exception of the exhibit sticker that is not present on the original document, Ford admits that the document identified by plaintiffs as Exhibit No. 2105, Bates stamped numbers 8007 1394-1399, appears to be a record of Ford's regularly conducted business activity.

REQUEST NO. 695

Admit that Exhibit 2106 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 696

Admit that Exhibit 2106 is a business record.

RESPONSE:

With the exception of the exhibit sticker that is not present on the original document, Ford admits that the document identified by plaintiffs as Exhibit No. 2106, Bates stamped numbers 8007 1125-1128, appears to be a record of Ford's regularly conducted business activity.

REQUEST NO. 697

Admit that Exhibit 2107 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 698

Admit that Exhibit 2107 is a business record.

RESPONSE:

With the exception of the exhibit sticker that is not present on the original document, Ford admits that the document identified by plaintiffs as Exhibit No. 2107, Bates stamped numbers 8003 1546-1583, appears to be a record of Ford's regularly conducted business activity.

REQUEST NO. 699

Admit that Exhibit 2108 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 700

Admit that Exhibit 2108 is a business record.

RESPONSE:

With the exception of the exhibit sticker that is not present on the original document, Ford admits that the document identified by plaintiffs as Exhibit No. 2108, Bates stamped numbers 8006 2115-2118, appears to be a record of Ford's regularly conducted business activity.

REQUEST NO. 701

Admit that Exhibit 2109 is an ancient document

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written

REQUEST NO. 702

Admit that Exhibit 2109 is a business record.

RESPONSE:

With the exception of the exhibit sticker that is not present on the original document, Ford admits that the document identified by plaintiffs as Exhibit No. 2109, Bates stamped number 8004 0236-0236, appears to be a record of Ford's regularly conducted business activity.

REQUEST NO. 703

Admit that Exhibit 2110 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 704

Admit that Exhibit 2110 is a business record.

RESPONSE:

With the exception of the exhibit sticker that is not present on the original document, Ford admits that the document identified by plaintiffs as Exhibit No. 2110, Bates stamped number 8004 0292-0292, appears to be a record of Ford's regularly conducted business activity.

REQUEST NO. 705

Admit that Exhibit 2111 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 706

Admit that Exhibit 2111 is a business record.

RESPONSE:

Ford denies this request as untrue.

REQUEST NO. 707

Admit that Exhibit 2112 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 708

Admit that Exhibit 2112 is a business record

RESPONSE:

With the exception of the exhibit sticker that is not present on the original document, Ford admits that the document identified by plaintiffs as Exhibit No. 2112, Bates stamped number 8004 0290-0290, appears to be a record of Ford's regularly conducted business activity.

REQUEST NO. 709

Admit that Exhibit 2113 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 710

Admit that Exhibit 2113 is a business record.

RESPONSE:

With the exception of the exhibit sticker that is not present on the original document, Ford admits that the document identified by plaintiffs as Exhibit No. 2113, Bates stamped numbers 8004 0724-0725, appears to be a record of Ford's regularly conducted business activity.

REQUEST NO. 711

Admit that Exhibit 2114 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 712

Admit that Exhibit 2114 is a business record.

RESPONSE:

With the exception of the exhibit sticker that is not present on the original document, Ford admits that the document identified by plaintiffs as Exhibit No. 2114, Bates stamped number 8007 0650-0650, appears to be a record of Ford's regularly conducted business activity.

REQUEST NO. 713

Admit that Exhibit 2115 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 714

Admit that Exhibit 2115 is a business record.

RESPONSE:

With the exception of the exhibit sticker that is not present on the original document, Ford admits that the document identified by plaintiffs as Exhibit No. 2115, Bates stamped numbers 8004 0745-0753, appears to be a record of Ford's regularly conducted business activity.

REQUEST NO. 715

Admit that Exhibit 2116 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 716

Admit that Exhibit 2116 is a business record.

RESPONSE:

With the exception of the exhibit sticker that is not present on the original document, Ford admits that the document identified by plaintiffs as Exhibit No. 2116, Bates stamped numbers 8008 0237-0239 only, appears to be a record of Ford's regularly conducted business

activity. Ford denies this request as untrue with respect to Exhibit No. 2116, Bates stamped numbers 8008 0240-0247.

REQUEST NO. 717

Admit that Exhibit 2117 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 718

Admit that Exhibit 2117 is a business record.

RESPONSE:

With the exception of the exhibit sticker that is not present on the original document, Ford admits that the document identified by plaintiffs as Exhibit No. 2117, Bates stamped number 8007 0217-0217, appears to be a record of Ford's regularly conducted business activity.

REQUEST NO. 719

Admit that T.J. Zaremba was a former Ford Motor Company employee.

RESPONSE:

Ford objects to this request because it is overly broad and seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Ford also objects to this request to the extent that it seeks information relating to facts and circumstances that are not substantially similar to those present in this case

REQUEST NO. 720

Admit that T.J. Zaremba alleged in a Workers' Compensation suit that he was exposed to asbestos while employed at Ford Motor Company's Livonia Transmission Plant.

RESPONSE:

Ford objects to this request because it is overly broad and seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Ford also objects to this request to the extent that it seeks the facts and circumstances of other claims that are not substantially similar to those present in this case. Finally, Ford objects to this request because the information is publicly available and the documents relating to any such allegations of Mr. Zaremba speak for themselves as to what he may have alleged in any workers' compensation lawsuit.

REQUEST NO. 721

Admit that the State of Michigan found that T.J. Zaremba was injured while exposed to asbestos during his employment at the Ford Motor Company's Livonia Transmission Plant.

RESPONSE:

Ford objects to this request because it is overly broad and seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Ford also objects to this request to the extent that it seeks the facts and circumstances of other claims that are not substantially similar to those present in this case. Finally, Ford objects to this request because the information is publicly available and the documents relating to any such finding speak for themselves.

REQUEST NO. 722

Admit that Exhibit 2118 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 722

Admit that Exhibit 2118 is a business record.

RESPONSE:

With the exception of the exhibit sticker that is not present on the original document, Ford admits that the document identified by plaintiffs as Exhibit No. 2118, Bates stamped numbers 8006 1303-1305, appears to be a record of Ford's regularly conducted business activity.

REQUEST NO. 724

Admit that Exhibit 2119 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 725

Admit that Exhibit 2119 is a business record.

RESPONSE:

Ford objects to this request as overly broad, unduly burdensome, and seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

REQUEST NO. 726

Admit that Exhibit 2119 is a translation of a learned treatise

RESPONSE:

Ford denies this request as untrue.

REQUEST NO. 727

Admit that Exhibit 2120 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 728

Admit that Exhibit 2120 is a business record

RESPONSE:

Ford objects to this request 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.

REQUEST NO. 729

Admit that Exhibit 2120 is a translation of a learned treatise.

RESPONSE:

Ford denies this request as untrue.

REQUEST NO. 730

Admit that Exhibit 2121 is an ancient document

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 731

Admit that Exhibit 2121 is a business record

RESPONSE:

Ford objects to this request as overly broad, unduly burdensome, and seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence

REQUEST NO. 732

Admit that Exhibit 2121 is a translation of a learned treatise.

RESPONSE:

Ford denies this request as untrue.

REQUEST NO. 733

Admit that Exhibit 2122 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 734

Admit that Exhibit 2122 is a business record

RESPONSE:

With the exception of the exhibit sticker that is not present on the original document, Ford admits that the document identified by plaintiffs as Exhibit No. 2122, Bates stamped number 8007 1491-1491, appears to be a record of Ford's regularly conducted business activity.

REQUEST NO. 735

Admit that Raybestos Brake linings generate asbestos fibers during their installation, maintenance and/or use.

RESPONSE:

Ford objects to this request as vague, ambiguous, overly broad, unduly burdensome, and seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Ford also objects to this request to the extent that it seeks information protected from disclosure by the attorney work product, consulting expert privilege, or any other applicable privilege. Ford further objects to this request to the extent that it prematurely seeks expert opinion testimony.

REQUEST NO. 736

Admit that Exhibit 2123 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 737

Admit that Exhibit 2123 is a business record.

RESPONSE:

With the exception of the exhibit sticker that is not present on the original document, Ford admits that the document identified by plaintiffs as Exhibit No. 2123, Bates stamped numbers 8001 0042-0043, appears to be a record of Ford's regularly conducted business activity.

REQUEST NO. 738

Admit that Exhibit 2124 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 739

Admit that Exhibit 2124 is a business record.

RESPONSE:

With the exception of the exhibit sticker that is not present on the original document, Ford admits that the document identified by plaintiffs as Exhibit No. 2124, Bates stamped numbers 8007 0955-0956 only, appears to be a record of Ford's regularly conducted business activity. Ford denies this request as untrue with respect to Exhibit No. 2124, Bates stamped number 8007 0957-0957.

REQUEST NO. 740

Admit that small tractor clutch plates used by the Ford Motor Company release dust which contains chrysotile asbestos fibers.

RESPONSE:

Ford objects to this request 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. Ford also objects to this request to the extent that it seeks information protected by the attorney work product doctrine, consulting expert privilege, or any other applicable privilege.

REQUEST NO. 741

Admit that Exhibit 2125 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 742

Admit that Exhibit 2125 is a business record.

RESPONSE:

With the exception of the exhibit sticker that is not present on the original document, Ford admits that the document identified by plaintiffs as Exhibit No. 2125, Bates stamped numbers 8007 0578-0580, appears to be a record of Ford's regularly conducted business activity.

REQUEST NO. 743

Admit that Exhibit 2126 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 744

Admit that Exhibit 2126 is a business record.

RESPONSE:

With the exception of the exhibit sticker that is not present on the original document, Ford admits that the document identified by plaintiffs as Exhibit No. 2126, Bates stamped number 8001 0047-0047, appears to be a record of Ford's regularly conducted business activity.

REQUEST NO. 745

Admit that Exhibit 2127 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 746

Admit that Exhibit 2127 is a business record.

RESPONSE:

Based upon information currently known to Ford, with the exception of the exhibit sticker that is not present on the original document, Ford admits that the document identified by plaintiffs as Exhibit No. 2127, Bates stamped numbers 8004 1149-1161, appears to be a record of Ford's regularly conducted business activity.

REQUEST NO. 747

Admit that Exhibit 2128 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 748

Admit that Exhibit 2128 is a business record.

RESPONSE:

With the exception of the exhibit sticker that is not present on the original document and the handwritten marginalia, Ford admits that the document identified by plaintiffs as Exhibit No.

2128, Bates stamped numbers 8008 0128-0130, appears to be a record of Ford's regularly conducted business activity.

REQUEST NO. 749

Admit that Exhibit 2129 is an ancient document

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written

REQUEST NO. 750

Admit that Exhibit 2129 is a business record

RESPONSE:

With the exception of the exhibit sticker that is not present on the original document, Ford admits that the document identified by plaintiffs as Exhibit No. 2129, Bates stamped numbers 8007 0405-0406, appears to be a record of Ford's regularly conducted business activity.

REQUEST NO. 751

Admit that Exhibit 2130 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 752

Admit that Exhibit 2130 is a business record.

RESPONSE:

With the exception of the exhibit sticker that is not present on the original document, Ford admits that the document identified by plaintiffs as Exhibit No. 2130, Bates stamped numbers 8005 0592-0597, appears to be a record of Ford's regularly conducted business activity.

REQUEST NO. 753

Admit that Exhibit 2131 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 754

Admit that Exhibit 2131 is a business record.

RESPONSE:

With the exception of the exhibit sticker that is not present on the original document, Ford admits that the document identified by plaintiffs as Exhibit No. 2131, Bates stamped numbers 8008 0114-0115, appears to be a record of Ford's regularly conducted business activity.

REQUEST NO. 755

Admit that Exhibit 2132 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 756

Admit that Exhibit 2132 is a business record.

RESPONSE:

With the exception of the exhibit sticker that is not present on the original document, Ford admits that the document identified by plaintiffs as Exhibit No. 2132, Bates stamped numbers 8006 2034-2038, appears to be a record of Ford's regularly conducted business activity.

REQUEST NO. 757

Admit that Exhibit 2133 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written

REQUEST NO. 758

Admit that Exhibit 2133 is a business record.

RESPONSE:

With the exception of the exhibit sticker that is not present on the original document, Ford admits that the document identified by plaintiffs as Exhibit No. 2133, Bates stamped number 8006 0083-0083, appears to be a record of Ford's regularly conducted business activity.

REQUEST NO. 759

Admit that Exhibit 2134 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 760

Admit that Exhibit 2134 is a business record.

RESPONSE:

With the exception of the exhibit sticker that is not present on the original document, Ford admits that the document identified by plaintiffs as Exhibit No. 2134, Bates stamped numbers 8008 0269-0270 only, appears to be an incomplete record, without an attachment, of Ford's regularly conducted business activity. Ford also admits that the documents identified by plaintiffs as Exhibit No. 2134, Bates stamped numbers 8008 0271-0271 and 8008 0272-0273, appear to be records of Ford's regularly conducted business activity

REQUEST NO. 761

Admit that Exhibit 2135 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 762

Admit that Exhibit 2135 is a business record.

RESPONSE:

With the exception of the exhibit sticker that is not present on the original document, Ford admits that the document identified by plaintiffs as Exhibit No. 2135, Bates stamped number 8007 0617-0617, appears to be a record of Ford's regularly conducted business activity.

REQUEST NO. 763

Admit that Exhibit 2136 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 764

Admit that Exhibit 2136 is a business record.

RESPONSE:

With the exception of the exhibit sticker that is not present on the original document, Ford admits only that Exhibit No. 2136, Bates stamped numbers 8007 1847-1848, consists of an incomplete document that would, in its entirety, appear to be a record of Ford's regularly conducted business activity. Ford denies any remaining part of this request as untrue.

REQUEST NO. 765

Admit that Exhibit 2137 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 766

Admit that Exhibit 2137 is a business record.

RESPONSE:

With the exception of the exhibit sticker that is not present on the original document, Ford admits only that Exhibit No. 2137, Bates stamped number 8006 0409-0409, consists of an incomplete document, without attachments, that would otherwise appear to be a record of Ford's regularly conducted business activity. Ford denies any remaining part of this request as untrue.

REQUEST NO. 767

Admit that Exhibit 2138 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 768

Admit that Exhibit 2138 is a business record.

RESPONSE:

With the exception of the exhibit sticker that is not present on the original document, Ford admits that the document identified by plaintiffs as Exhibit No. 2138, Bates stamped numbers 8007 0614-0616, appears to be a record of Ford's regularly conducted business activity.

REQUEST NO. 769

Admit that Exhibit 2139 is an ancient document

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 770

Admit that Exhibit 2139 is a business record.

RESPONSE:

With the exception of the exhibit sticker that is not present on the original document, Ford admits that Exhibit No. 2139, Bates stamped numbers 8006 1180-1181 appears to be a record of Ford's regularly conducted business activity.

REQUEST NO. 771

Admit that Exhibit 2140 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 772

Admit that Exhibit 2140 is a business record.

RESPONSE:

With the exception of the exhibit sticker that is not present on the original document, Ford admits only that Exhibit No. 2140, Bates stamped number 8008 0583-0583, consists of excerpts from a portion of a document that, in its entirety, appears to be a record of Ford's regularly conducted business activity. Ford denies any remaining part of this request as untrue.

REQUEST NO. 773

Admit that Exhibit 2141 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 774

Admit that Exhibit 2141 is a business record

RESPONSE:

With the exception of the exhibit sticker that is not present on the original document, Ford admits that the document identified by plaintiffs as Exhibit No. 2141, Bates stamped numbers 8006 2105-2107, appears to be a record of Ford's regularly conducted business activity.

REQUEST NO. 775

Admit that Exhibit 2142 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 776

Admit that Exhibit 2142 is a business record.

RESPONSE:

With the exception of the exhibit sticker that is not present on the original document, Ford admits that the document identified by plaintiffs as Exhibit No. 2142, Bates stamped number 8006 0263-0263, appears to be a record of Ford's regularly conducted business activity. After a reasonable inquiry, the information known or readily obtainable to Ford is insufficient to enable Ford to either admit or deny this request with respect to Exhibit No. 2142, Bates stamped number 8006 0262-0262

REQUEST NO. 777

Admit that Exhibit 2143 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 778

Admit that Exhibit 2143 is a business record.

RESPONSE:

With the exception of the exhibit sticker that is not present on the original document, Ford admits that the document identified by plaintiffs as Exhibit No. 2143, Bates stamped number 8008 0209-0209, appears to be a record of Ford's regularly conducted business activity.

REQUEST NO. 779

Admit that Exhibit 2144 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written

REQUEST NO. 780

Admit that Exhibit 2144 is a business record.

RESPONSE:

With the exception of the exhibit sticker that is not present on the original document, Ford admits that the document identified by plaintiffs as Exhibit No. 2144, Bates stamped numbers 8006 1183-1187, appears to be a record of Ford's regularly conducted business activity.

REQUEST NO. 781

Admit that Exhibit 2145 is an ancient document

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 782

Admit that Exhibit 2145 is a business record.

RESPONSE:

Ford denies this request as untrue.

REQUEST NO. 783

Admit that Ford Motor Company was a member of the Industrial Hygiene Foundation from January 7, 1947 to December 31, 1974.

RESPONSE:

Based on information currently known to Ford, Ford admits this request.

REQUEST NO. 784

Admit that Ford Motor Company received copies of the Industrial Hygiene Foundation's Industrial Hygiene Digest between January 1947 and December 1974.

RESPONSE:

Ford objects to this request because it is vague, ambiguous, overly broad and unduly burdensome. Further, the information sought is neither relevant to the issues in this lawsuit, nor reasonably calculated to lead to the discovery of admissible evidence.

REQUEST NO. 785

Admit that Ford Motor company employee John Bugas was a trustee of the Industrial Hygiene Foundation from October 1955 to December 1958.

RESPONSE:

Ford objects to this request because it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Ford also objects to this request because, after a reasonable inquiry, the information may no longer be available and in Ford's possession, custody or control to Ford to either admit or deny this request. As such, the information known or readily obtainable to Ford is insufficient to enable Ford to either admit or deny this request

REQUEST NO. 786

Admit that Ford Motor company employee Robert T. Ross was a trustee of the Industrial Hygiene Foundation from May 1959 to October 1967

RESPONSE:

Ford objects to this request because it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Ford also objects to this request because, after a reasonable inquiry, the information may no longer be available and in Ford's possession, custody or control to Ford to either admit or deny this request. As such, the information known or readily obtainable to Ford is insufficient to enable Ford to either admit or deny this request.

REQUEST NO. 787

Admit that Ford Motor company employee Paul D. Colombo was a trustee of the Industrial Hygiene Foundation from October 1967 to October 1970.

RESPONSE:

Ford objects to this request because it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Ford also objects to this

request because, after a reasonable inquiry, the information may no longer be available and in Ford's possession, custody or control to Ford to either admit or deny this request. As such, the information known or readily obtainable to Ford is insufficient to enable Ford to either admit or deny this request

REQUEST NO. 788

Admit that Exhibit 2146 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 789

Admit that Exhibit 2146 is a business record.

RESPONSE:

With the exception of the exhibit sticker that is not present on the original document, Ford admits that the document identified by plaintiffs as Exhibit No. 2146, Bates stamped numbers 8006 0243-0244, appears to be a record of Ford's regularly conducted business activity.

REQUEST NO. 790

Admit that Exhibit 2147 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 791

Admit that Exhibit 2147 is a business record.

RESPONSE:

With the exception of the exhibit sticker that is not present on the original document, Ford admits that the document identified by plaintiffs as Exhibit No 2147, Bates stamped numbers 8008 0202-0204, appears to be a record of Ford's regularly conducted business activity.

REQUEST NO. 792

Admit that Exhibit 2148 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 793

Admit that Exhibit 2148 is a business record.

RESPONSE:

With the exception of the exhibit sticker that is not present on the original document, Ford admits that the document identified by plaintiffs as Exhibit No. 2148, Bates stamped numbers 8006 1170-1171 only, appears to be a record of Ford's regularly conducted business activity. With the exception of the marginalia, Ford also admits that the documents identified by plaintiffs as Exhibit No. 2148, Bates stamped number 8006 1172-1172, appears to be an incomplete record of what otherwise would be Ford's regularly conducted business activity. Ford denies any remaining part of this request as untrue.

REQUEST NO. 794

Admit that Exhibit 2149 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 795

Admit that Exhibit 2149 is a business record.

RESPONSE:

With the exception of the exhibit sticker that is not present on the original document and the marginalia, Ford admits that the documents identified by plaintiffs as Exhibit No. 2149, Bates stamped numbers 8006 1195-1195, 8006 1197-1197, 8006 1200-1200, 8006 1202-1218, 8006 1220-1220, 8006 1221-1221, 8006 1222-1222, 8006 1229-1229, 8006 1230-1246, and 8006 1248-1294 only, appear to be records or excerpts of records of Ford's regularly conducted business activity. Ford denies this request as untrue with respect to Exhibit No. 2150, Bates stamped numbers 8006 1193-1193, 8006 1194-1194, 8006 1196-1196, 8006 1198-1198, 8006 1199-1199, 8006 1201-1201, 8006 1219-1219, 8006 1223-1227, 8006 1228-1228, and 8006 1247-1247. Ford denies any remaining part of this request as untrue.

REQUEST NO. 796

Admit that Exhibit 2150 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 797

Admit that Exhibit 2150 is a business record.

RESPONSE:

With the exception of the exhibit sticker that is not present on the original document, Ford admits that the document identified by plaintiffs as Exhibit No. 2150, Bates stamped numbers 8006 1168-1169, appears to be a record of Ford's regularly conducted business activity.

REQUEST NO. 798

Admit that Exhibit 2151 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written

REQUEST NO. 799

Admit that Exhibit 2151 is a business record.

RESPONSE:

With the exception of the exhibit sticker that is not present on the original document, Ford admits that the document identified by plaintiffs as Exhibit No. 2151, Bates stamped numbers 8007 0546-0550, appears to be a record of Ford's regularly conducted business activity.

REQUEST NO. 800

Admit that Exhibit 2152 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 801

Admit that Exhibit 2152 is a business record.

RESPONSE:

With the exception of the exhibit sticker that is not present on the original document, Ford admits that the document identified by plaintiffs as Exhibit No. 2152, Bates stamped numbers 8006 1301-1302, appears to be a record of Ford's regularly conducted business activity.

REQUEST NO. 802

Admit that Exhibit 2153 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 803

Admit that Exhibit 2153 is a business record.

RESPONSE:

With the exception of the exhibit sticker that is not present on the original document, Ford admits that the document identified by plaintiffs as Exhibit No. 2153, Bates stamped numbers 8007 1843-1844, appears to be a record of Ford's regularly conducted business activity.

REQUEST NO. 804

Admit that Exhibit 2154 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 805

Admit that Exhibit 2154 is a business record.

RESPONSE:

With the exception of the exhibit sticker that is not present on the original document, Ford admits that the document identified by plaintiffs as Exhibit No. 2154, Bates stamped numbers 8008 0022-0027, appears to be a record of Ford's regularly conducted business activity.

REQUEST NO. 806

Admit that Exhibit 2155 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 807

Admit that Exhibit 2155 is a business record.

RESPONSE:

With the exception of the exhibit sticker that is not present on the original document, Ford admits that the document identified by plaintiffs as Exhibit No. 2155, Bates stamped numbers 8007 0597-0607, appears to be a record of Ford's regularly conducted business activity.

REQUEST NO. 808

Admit that Exhibit 2156 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written

REQUEST NO. 809

Admit that Exhibit 2156 is a business record.

RESPONSE:

With the exception of the exhibit sticker that is not present on the original document, Ford admits that the document identified by plaintiffs as Exhibit No. 2156, Bates stamped numbers 8007 0779-0780, appears to be a record of Ford's regularly conducted business activity.

REQUEST NO. 810

Admit that Exhibit 2157 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written

REQUEST NO. 811

Admit that Exhibit 2157 is a business record.

RESPONSE:

With the exception of the exhibit sticker that is not present on the original document, Ford admits that the document identified by plaintiffs as Exhibit No. 2157, Bates stamped numbers 8008 0001-0005, appears to be a record of Ford's regularly conducted business activity.

REQUEST NO. 812

Admit that Exhibit 2158 is an ancient document

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 813

Admit that Exhibit 2158 is a business record.

RESPONSE:

Ford objects to this request because it is overly broad and seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Ford also objects to this request to the extent that it seeks information regarding facts and circumstances that are unrelated to the allegations in this case.

REQUEST NO. 814

Admit that 40 former Ford employees had died of mesothelioma as of September 5, 1984.

RESPONSE:

Ford objects to this request because it is overly broad and seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Ford also objects to this request to the extent that it seeks information regarding other facts and circumstances that are not substantially similar to those present in this case.

REQUEST NO. 815

Admit that as of September 5, 1984, Ford Motor Company has the ability to determine which of its current and former employees had died of mesothelioma.

RESPONSE:

Ford objects to this request because it is vague, overly broad, and seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Ford also objects to this request to the extent that it seeks information regarding other facts and circumstances that are not substantially similar to those present in this case.

REQUEST NO. 816

Admit that Exhibit 2159 is an ancient document

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 817

Admit that Exhibit 2159 is a business record

RESPONSE:

Ford denies this request as untrue.

REQUEST NO. 818

Admit that on October 1, 1984, Ford Motor Company was a member of the Friction Materials Standards Institute.

RESPONSE:

Ford denies this request as untrue.

REQUEST NO. 818

Admit that Exhibit 2160 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 820

Admit that Exhibit 2160 is a business record.

RESPONSE:

Ford denies this request as untrue.

REQUEST NO. 821

Admit that William Kent Miller was a former Ford Motor Company employee.

RESPONSE:

Ford objects to this request because it is overly broad and seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Ford also objects to this interrogatory to the extent that it seeks information relating to facts and circumstances that are not substantially similar to those present in this case.

REQUEST NO. 822:

Admit that William Kent Miller alleged in his Workers Compensation Appeal Board case that he was injured due to his asbestos exposure while an employee of Ford Motor Company.

RESPONSE:

Ford objects to this request because it is overly broad and seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Ford also objects to this interrogatory to the extent that it seeks the facts and circumstances of other claims that are not substantially similar to those present in this case. Finally, Ford objects to this request because the information is publicly available and the documents relating to any such

allegations of Mr. Miller speak for themselves as to what he may have alleged in any Workers Compensation Appeal Board case.

REQUEST NO. 823

Admit that Exhibit 2161 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 824

Admit that Exhibit 2161 is a business record.

RESPONSE:

Ford denies this request as untrue.

REQUEST NO. 825

Admit that Exhibit 2161 is a public record.

RESPONSE:

Ford objects to this request because it seeks information that is available in the public domain. Ford also objects to this request because it requires Ford to conduct a search of information outside of its possession, custody and control to adequately respond. Accordingly, Ford is without current knowledge or information sufficient to admit or deny this request.

REQUEST NO. 826

Admit that Joseph E. Grace was a former Ford Motor Company employee.

RESPONSE:

Ford objects to this request because it is overly broad and seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Ford also objects to this interrogatory to the extent that it seeks information relating to facts and circumstances that are not substantially similar to those present in this case.

REQUEST NO. 827:

Admit that Joseph E. Grace alleged in his Bureau of Workmen's Compensation Petition for Hearing that he was injured due to his asbestos exposure while an employee of Ford Motor Company.

RESPONSE:

Ford objects to this request because it is overly broad and seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Ford also objects to this interrogatory to the extent that it seeks the facts and circumstances of other claims that are not substantially similar to those present in this case. Finally, Ford objects to this request because the information is publicly available and the documents relating to any such allegations of Mr. Grace speak for themselves as to what he may have alleged in any workers' compensation petition.

REQUEST NO. 828

Admit that Exhibit 2162 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 829

Admit that Exhibit 2162 is a business record.

RESPONSE:

Ford denies this request as untrue.

REQUEST NO. 830

Admit that Exhibit 2163 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 831

Admit that Exhibit 2163 is a business record.

RESPONSE:

With the exception of the exhibit sticker that is not present on the original document, Ford admits that the document identified by plaintiffs as Exhibit No. 2163, Bates stamped numbers 8004 0432-0433, appears to be a record of Ford's regularly conducted business activity.

REQUEST NO. 832

Admit that Exhibit 2164 is an ancient document

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 833

Admit that Exhibit 2164 is a business record.

RESPONSE:

With the exception of the exhibit sticker that is not present on the original document, Ford admits that the document identified by plaintiffs as Exhibit No. 2164, Bates stamped numbers 8006 1188-1192, appears to be a record of Ford's regularly conducted business activity.

REQUEST NO. 834

Admit that Exhibit 2165 is an ancient document

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 835

Admit that Exhibit 2165 is a business record

RESPONSE:

Ford denies this request as untrue.

REQUEST NO. 836

Admit that Exhibit 2165 is a learned treatise.

RESPONSE:

With the exception of the exhibit sticker, Ford admits that Exhibit No. 2165, Bates stamped numbers 8006 1023-1149, is a learned treatise.

REQUEST NO. 837

Admit that Exhibit 2165 is a public record

RESPONSE:

Ford objects to this request because it seeks information that is available in the public domain. Ford also objects to this request because it requires Ford to conduct a search of information outside of its possession, custody and control to adequately respond. Accordingly, Ford is without current knowledge or information sufficient to admit or deny this request.

REQUEST NO. 838

Admit that Exhibit 2166 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 839

Admit that Exhibit 2166 is a business record.

RESPONSE:

Ford denies this request as untrue.

REQUEST NO. 840

Admit that Exhibit 2167 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 841

Admit that Exhibit 2167 is a business record.

RESPONSE:

With the exception of the exhibit sticker that is not present on the original document, Ford admits that the document identified by plaintiffs as Exhibit No. 2167, Bates stamped numbers 8007 0243-0250, appears to be a record of Ford's regularly conducted business activity.

REQUEST NO. 842

Admit that Exhibit 2168 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 843

Admit that Exhibit 2168 is a business record.

RESPONSE:

Ford denies this request as untrue.

REQUEST NO. 844

Admit that Exhibit 2168 is a public record.

RESPONSE:

Ford objects to this request because it seeks information that is available in the public domain. Ford also objects to this request because it requires Ford to conduct a search of information outside of its possession, custody and control to adequately respond. Accordingly, Ford is without current knowledge or information sufficient to admit or deny this request

REQUEST NO. 845

Admit that James Pickney Smith was a former Ford Motor Company employee.

RESPONSE:

Ford objects to this request because it is overly broad and seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Ford also objects to this interrogatory to the extent that it seeks information relating to facts and circumstances that are not substantially similar to those present in this case.

REQUEST NO. 846

Admit that James Pickney Smith died of carcinoma of the lung.

RESPONSE:

Ford objects to this request because it is overly broad, unduly burdensome, seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Ford also objects to this request to the extent that it seeks information relating to facts and circumstances that are not substantially similar to those present in this case. Finally, Ford objects to this request to the extent that it seeks information protected by the attorney work product doctrine, consulting expert privilege or any other applicable privilege.

REQUEST NO. 847

Admit that Exhibit 2169 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 848

Admit that Exhibit 2169 is a business record.

RESPONSE:

Ford denies this request as untrue.

REQUEST NO. 849

Admit that Exhibit 2169 is a public record.

RESPONSE:

Ford objects to this request because it seeks information that is available in the public domain. Ford also objects to this request because it requires Ford to conduct a search of information outside of its possession, custody and control to adequately respond. Accordingly, Ford is without current knowledge or information sufficient to admit or deny this request.

REQUEST NO. 850

Admit that Exhibit 2170 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 851

Admit that Exhibit 2170 is a business record.

RESPONSE:

Ford denies this request as untrue.

REQUEST NO. 852

Admit that Exhibit 2171 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 853

Admit that Exhibit 2171 is a business record.

RESPONSE:

Ford denies this request as untrue.

REQUEST NO. 854

Admit that Exhibit 2172 is an ancient document.

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written.

REQUEST NO. 855

Admit that Exhibit 2172 is a business record.

RESPONSE:

Ford denies this request as untrue.

REQUEST NO. 856

Admit that Exhibit 2173 is an ancient document

RESPONSE:

Ford objects to plaintiffs' proposed definition of the term "ancient document" because it is contrary to the definition of an ancient document under applicable local law. Accordingly, Ford is unable to admit or deny this request as written. Additionally, plaintiffs did not provide Ford with a copy of this document so Ford is without current knowledge or information sufficient to admit or deny this request.

REQUEST NO. 857

Admit that Exhibit 2173 is a business record.

RESPONSE:

Plaintiffs did not provide Ford with a copy of this document so Ford is without current knowledge or information sufficient to admit or deny this request.

CERTIFICATE OF SERVICE

I hereby certify that a copy of the above and foregoing was duly mailed, postage prepaid, this 9th day of August 2005, to:

Kenneth B. McClain
Steven E. Crick
Scott A. Britton-Mehlisch
HUMPHREY, FARRINGTON & MCCLAIN, PC
221 West Lexington
Suite 400
P.O. Box 900
Independence, MO 64051

ATTORNEYS FOR PLAINTIFFS

A handwritten signature, appearing to read "Steven E. Crick", is written in black ink over a solid horizontal line. The signature is stylized, with a large loop at the end.