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RE: Ricky R. Evans vs. Union Carbide Corporation, et al.
Court No: 1322-CC00881
Our File No: FD-81028

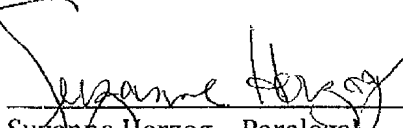
Dear Counsel:

Enclosed please find answers and responses to plaintiff's interrogatories and request for production regarding payments to certain doctors, scientists, authors and/or organizations from our client, Ford Motor Company. Executed verifications will be forwarded to your attention shortly.

Contact Renee Ziolkowski if you have any questions.

Very truly yours,

SANCHEZ DANIELS & HOFFMAN LLP


Suzanne Herzog - Paralegal

Encl

CC: ACOR via Case.net w/o encl.

IN THE CIRCUIT COURT OF THE CITY OF ST. LOUIS
STATE OF MISSOURI

Ricky R. Evans,	)	
	)	
Plaintiff,	)	
	)	Cause No. 1322-CC00881
vs.	)	
	)	
Union Carbide Corporation, et al.,	)	
	)	<i>Asbestos Personal Injury</i>
Defendants.	)	

**FORD MOTOR COMPANY'S ANSWERS TO INTERROGATORIES TO DEFENDANT
FORD MOTOR COMPANY REGARDING PAYMENTS
TO CERTAIN DOCTORS, SCIENTISTS, AUTHORS AND/OR ORGANIZATIONS**

Ford Motor Company ("Ford") herein submits its Answers to Plaintiff's Interrogatories to Defendant Ford Motor Company Regarding Payments to Certain Doctors, Scientists, Authors and/or Organizations.

PRELIMINARY STATEMENT AND GENERAL OBJECTIONS

Ford's responses to Plaintiff's interrogatories have been prepared in accordance with the *Missouri Rules of Civil Procedure*, pursuant to a reasonable and duly diligent investigation and search in the United States for the information requested. These answers are based upon facts known or believed by Ford at the time of responding to 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 answers are based on information currently available, and Ford expressly reserves the right to supplement or amend these responses should additional and/or contradictory information come to light at a later date.

ANSWERS TO INDIVIDUAL INTERROGATORIES

Subject to the foregoing statement and objections, Ford answers each individual interrogatory as follows:

INTERROGATORY NO. 1:

Please state whether you, your agents or your counsel, have paid any money and/or retained the services of The Chrysotile Institute, including, but not limited to, anyone affiliated with, associated with or employed by The Chrysotile Institute (collectively, "The Chrysotile Institute") from its inception until the present date.

ANSWER:

Ford has not identified any expert witness at The Chrysotile Institute to be called at the trial of this lawsuit. As such, the information sought in this interrogatory, is neither relevant to the subject matter of this action nor reasonably calculated to lead to the discovery of admissible evidence. Ford also objects to this interrogatory because it is vague, ambiguous, overly broad, unduly burdensome, and seeks information that is neither relevant to the subject matter of this action nor reasonably calculated to lead to the discovery of admissible evidence. This interrogatory is not limited to a reasonable time frame or scope, and instead seeks information pertaining to whether Ford ever paid money and/or retained the services of the Chrysotile Institute for any purpose whatsoever, if at all, at any time from the organization's inception until the present date, and without any reasonable limitation to those payments made in connection with the defense of asbestos friction litigation claims or to those particular experts identified in this matter. Ford further objects to this interrogatory to the extent it seeks information that is protected from disclosure by the attorney-client privilege, work product doctrine, consulting expert privilege, or any other applicable privilege. Ford also objects to this interrogatory to the extent it calls for expert opinions, materials and conclusions and therefore prematurely seeks the disclosure of information which is properly the subject of expert witness testimony and/or reports.

INTERROGATORY NO. 2:

If your response to the Interrogatory No. 1 is yes, please:

- (a) Identify each and every transaction (*i.e.*, all instances where money was paid to The Chrysotile Institute, and/or where The Chrysotile Institute was retained) between you, your agents or your counsel with The Chrysotile Institute?
- (b) State to whom (individual or company) a fee, money, retainer and/or the like was paid?
- (c) State the amount of each and every fee, money, retainer and/or the like?
- (d) State for what purpose said fee, money, retainer and/or the like was paid to these individuals and/or the companies?
- (e) State whether any documentation was generated from the transaction(s), including, but not restricted to invoices, reports, notes and the like?
- (f) If your response to Subparagraph (e) is yes, identify:
 - (i) the documents generated;
 - (ii) where such documents went; and
 - (iii) who currently has the documents in their possession, custody or control?

ANSWER:

Ford refers Plaintiff to, and incorporates herein, its answer and objections to Interrogatory No. 1.

INTERROGATORY NO. 3:

Please state whether you, your agents or your counsel, have paid money and/or retained the services of Exponent, Inc., including, but not limited to, anyone affiliated with, associated with or employed by Exponent, Inc. (collectively, "Exponent, Inc.") from its inception until the present date.

ANSWER:

After a reasonable inquiry and diligent search in those areas of the company where information responsive to this interrogatory would likely be located, Ford states that it has paid Exponent, Inc. the following approximate amounts in connection with the defense of asbestos -

friction litigation claims from January 1, 2001 through the present:

Exponent, Inc.	
2001	\$853,650.69
2002	\$1,988,754.17
2003	\$1,602,457.30
2004	\$1,844,472.33
2005	\$837,500.29
2006	\$796,284.58
2007	\$510,674.76
2008	\$652,409.09
2009	\$713,911.49
2010	\$2,012,109.86
2011	\$1,722,498.24
2012	\$1,666,604.78
2013	\$1,503,624.92
2014	\$287,381.50

Ford otherwise objects to this interrogatory because it is vague, ambiguous, overly broad, unduly burdensome, and seeks information that is neither relevant to the subject matter of this action nor reasonably calculated to lead to the discovery of admissible evidence. This interrogatory is not limited to a reasonable time frame or scope, and instead seeks information pertaining to whether Ford ever paid money and/or retained the services of the Exponent, Inc. for any purpose whatsoever, at any time from the organization's inception until the present date, and without any reasonable limitation to those payments made in connection with the defense of asbestos friction litigation claims or to those particular experts identified in this matter. Ford further objects to this

interrogatory to the extent it seeks information that is protected from disclosure by the attorney-client privilege, work product doctrine, consulting expert privilege, or any other applicable privilege. Ford also objects to this interrogatory to the extent it calls for expert opinions, materials and conclusions and therefore prematurely seeks the disclosure of information which is properly the subject of expert witness testimony and/or reports.

INTERROGATORY NO. 4:

If your response to the Interrogatory No. 3 is yes, please:

- (a) Identify each and every transaction (*i.e.*, all instances where money was paid to Exponent, and/or where Exponent Inc. was retained) between you, your agents or your counsel with Exponent, Inc.?
- (b) State to whom (individual or company) a fee, money, retainer and/or the like was paid?
- (c) State the amount of each and every fee, money, retainer and/or the like?
- (d) State for what purpose said fee, money, retainer and/or the like was paid to these individuals and/or the companies?
- (e) State whether any documentation was generated from the transaction(s), including, but not restricted to invoices, reports, notes and the like?
- (f) If your response to Subparagraph (e) is yes, identify:
 - (i) the documents generated;
 - (ii) where such documents went; and
 - (iii) who currently has the documents in their possession, custody or control?

ANSWER:

Ford refers Plaintiff to, and incorporates herein, its answer and objections to Interrogatory No. 3.

INTERROGATORY NO. 5:

Please state whether you, your agents or your counsel, have paid money and/or retained the

services of Chemrisk®, including, but not limited to, anyone affiliated with, associated with or employed by Chemrisk® (collectively, “Chemrisk®”) from its inception until the present date?

ANSWER:

After a reasonable inquiry and diligent search in those areas of the company where information responsive to this interrogatory would likely be located, Ford states that it has paid Chemrisk, Inc. the following approximate amounts in connection with the defense of asbestos friction litigation claims from January 1, 2001 through the present:

Chemrisk, Inc.	
2001	\$0
2002	\$0
2003	\$171,214.15
2004	\$735,030.32
2005	\$797,787.75
2006	\$984,427.77
2007	\$703,423.38
2008	\$834,334.55
2009	\$695,591.23
2010	\$2,528,949.20
2011	\$1,143,989.72
2012	\$1,171,810.50
2013	\$1,180,433.85
2014	\$94,875.00

Ford otherwise objects to this interrogatory because it is vague, ambiguous, overly broad, unduly burdensome, and seeks information that is neither relevant to the subject matter of this action nor reasonably calculated to lead to the discovery of admissible evidence. This interrogatory is not

limited to a reasonable time frame or scope, and instead seeks information pertaining to whether Ford ever paid money and/or retained the services of the Chemrisk, Inc. for any purpose whatsoever, at any time from the organization's inception until the present date, and without any reasonable limitation to those payments made in connection with the defense of asbestos friction litigation claims or to those particular experts identified in this matter. Ford further objects to this interrogatory to the extent it seeks information that is protected from disclosure by the attorney-client privilege, work product doctrine, consulting expert privilege, or any other applicable privilege. Ford also objects to this interrogatory to the extent it calls for expert opinions, materials and conclusions and therefore prematurely seeks the disclosure of information which is properly the subject of expert witness testimony and/or reports.

INTERROGATORY NO. 6:

If your response to the Interrogatory No. 5 is yes, please:

- (a) Identify each and every transaction (*i.e.*, all instances where money was paid to Chemrisk®, and/or where Chemrisk®. was retained) between you, your agents or your counsel with Chemrisk®?
- (b) State to whom (individual or company) a fee, money, retainer and/or the like was paid?
- (c) State the amount of each and every fee, money, retainer and/or the like?
- (d) State for what purpose said fee, money, retainer and/or the like was paid to these individuals and/or the companies?
- (e) State whether any documentation was generated from the transaction(s), including, but not restricted to invoices, reports, notes and the like?
- (f) If your response to Subparagraph (e) is yes, identify:
 - (i) the documents generated;
 - (ii) where such documents went; and
 - (iii) who currently has the documents in their possession, custody or control?

ANSWER:

Ford refers Plaintiff to, and incorporates herein, its answer and objections to Interrogatory No. 5.

INTERROGATORY NO. 7:

Please state whether you, your agents or your counsel, have paid money and/or retained the services of Tetra Tech Sciences, including, but not limited to, anyone affiliated with, associated with or employed by Tetra Tech Sciences (collectively, "Tetra Tech Sciences") from its inception until the present date?

ANSWER:

After a reasonable inquiry and diligent search in those areas of the company where information responsive to this interrogatory would likely be located, Ford states that it has paid Tetra Tech Sciences (f/k/a Sciences International) the following approximate amounts in connection with the defense of asbestos friction litigation claims from January 1, 2001 through the present:

Tetra Tech Sciences (formerly Sciences International)	
2001	\$0
2002	\$0
2003	\$0
2004	\$53,725.89
2005	\$225,767.27
2006	\$200,119.67
2007	\$51,689.39
2008	\$49,516.33
2009	\$133,425.42
2010	\$299,139.97

2011	\$405,174.26
2012	\$291,805.51
2013	\$369,907.38
2014	\$31,254.12

Ford otherwise objects to this interrogatory because it is vague, ambiguous, overly broad, unduly burdensome, and seeks information that is neither relevant to the subject matter of this action nor reasonably calculated to lead to the discovery of admissible evidence. This interrogatory is not limited to a reasonable time frame or scope, and instead seeks information pertaining to whether Ford ever paid money and/or retained the services of the Tetra Tech Sciences, for any purpose whatsoever, at any time from the organization's inception until the present date, and without any reasonable limitation to those payments made in connection with the defense of asbestos friction litigation claims or to those particular experts identified in this matter. Ford further objects to this interrogatory to the extent it seeks information that is protected from disclosure by the attorney-client privilege, work product doctrine, consulting expert privilege, or any other applicable privilege. Ford also objects to this interrogatory to the extent it calls for expert opinions, materials and conclusions and therefore prematurely seeks the disclosure of information which is properly the subject of expert witness testimony and/or reports.

INTERROGATORY NO. 8:

If your response to the Interrogatory No. 7 is yes, please:

- (a) Identify each and every transaction (*i.e.*, all instances where money was paid to Tetra Tech Sciences, and/or Tetra Tech Sciences was retained) between you, your agents or your counsel with Tetra Tech Sciences?

- (b) State to whom (individual or company) a fee, money, retainer and/or the like was paid?
- (c) State the amount of each and every fee, money, retainer and/or the like?
- (d) State for what purpose said fee, money, retainer and/or the like was paid to these individuals and/or the companies?
- (e) State whether any documentation was generated from the transaction(s), including, but not restricted to invoices, reports, notes and the like?
- (f) If your response to Subparagraph (e) is yes, identify:
 - (i) the documents generated;
 - (ii) where such documents went; and
 - (iii) who currently has the documents in their possession, custody or control?

ANSWER:

Ford refers Plaintiff to, and incorporates herein, its answer and objections to Interrogatory No. 7.

INTERROGATORY NO. 9:

Please state whether you, your agents or your counsel, have paid money and/or retained the services of The Quebec Asbestos Mining Association, including, but not limited to, anyone affiliated with, associated with or employed by The Quebec Asbestos Mining Association (collectively, "QAMA") from its inception until the present date.

ANSWER:

Ford has not identified any expert witness at The Quebec Asbestos Mining Association to be called at the trial of this lawsuit. As such, the information sought in this interrogatory, is neither relevant to the subject matter of this action nor reasonably calculated to lead to the discovery of admissible evidence. Ford also objects to this interrogatory because it is vague, ambiguous, overly broad, unduly burdensome, and seeks information that is neither relevant to the subject matter of this

action nor reasonably calculated to lead to the discovery of admissible evidence. This interrogatory is not limited to a reasonable time frame or scope, and instead seeks information pertaining to whether Ford ever paid money and/or retained the services of The Quebec Asbestos Mining Association, for any purpose whatsoever, if at all, at any time from the organization's inception until the present date, and without any reasonable limitation to those payments made in connection with the defense of asbestos friction litigation claims or to those particular experts identified in this matter. Ford further objects to this interrogatory to the extent it seeks information that is protected from disclosure by the attorney-client privilege, work product doctrine, consulting expert privilege, or any other applicable privilege. Ford also objects to this interrogatory to the extent it calls for expert opinions, materials and conclusions and therefore prematurely seeks the disclosure of information which is properly the subject of expert witness testimony and/or reports.

INTERROGATORY NO. 10:

If your response to the Interrogatory No. 9 is yes, please:

- (a) Identify each and every transaction (*i.e.*, all instances where money was paid to The Quebec Asbestos Mining Association and/or The Quebec Asbestos Mining Association was retained) between you, your agents or your counsel with The The [sic] Quebec Asbestos Mining Association?
- (b) State to whom (individual or company) a fee, money, retainer and/or the like was paid?
- (c) State the amount of each and every fee, money, retainer and/or the like?
- (d) State for what purpose said fee, money, retainer and/or the like was paid to these individuals and/or the companies?
- (e) State whether any documentation was generated from the transaction(s), including, but not restricted to invoices, reports, notes and the like?
- (f) If your response to Subparagraph (e) is yes, identify:
 - (i) the documents generated;

- (ii) where such documents went; and
- (iii) who currently has the documents in their possession, custody or control?

ANSWER:

Ford refers Plaintiff to, and incorporates herein, its answer and objections to Interrogatory No. 9.

INTERROGATORY NO. 11:

Please state whether you, your agents or your counsel, have paid money and/or retained the services of Veritox, Inc., including, but not limited to, anyone affiliated with, associated with or employed by Veritox, Inc. (collectively, "Veritox, Inc.") from its inception until the present date.

ANSWER:

Ford has not identified any expert witness at Veritox, Inc. to be called at the trial of this lawsuit. As such, the information sought in this interrogatory, is neither relevant to the subject matter of this action nor reasonably calculated to lead to the discovery of admissible evidence. Ford also objects to this interrogatory because it is vague, ambiguous, overly broad, unduly burdensome, and seeks information that is neither relevant to the subject matter of this action nor reasonably calculated to lead to the discovery of admissible evidence. This interrogatory is not limited to a reasonable time frame or scope, and instead seeks information pertaining to whether Ford ever paid money and/or retained the services of the Veritox, Inc., for any purpose whatsoever, if at all, at any time from the organization's inception until the present date, and without any reasonable limitation to those payments made in connection with the defense of asbestos friction litigation claims or to those particular experts identified in this matter. Ford further objects to this interrogatory to the extent it seeks information that is protected from disclosure by the attorney-client privilege, work product doctrine, consulting expert privilege, or any other applicable privilege. Ford also objects to

this interrogatory to the extent it calls for expert opinions, materials and conclusions and therefore prematurely seeks the disclosure of information which is properly the subject of expert witness testimony and/or reports.

INTERROGATORY NO. 12:

If your response to the Interrogatory No. 11 is yes, please:

- (a) Identify each and every transaction (*i.e.*, all instances where money was paid to Veritox, Inc. and/or Veritox, Inc. was retained) between you, your agents or your counsel with Veritox, Inc.?
- (b) State to whom (individual or company) a fee, money, retainer and/or the like was paid?
- (c) State the amount of each and every fee, money, retainer and/or the like?
- (d) State for what purpose said fee, money, retainer and/or the like was paid to these individuals and/or the companies?
- (e) State whether any documentation was generated from the transaction(s), including, but not restricted to invoices, reports, notes and the like?
- (f) If your response to Subparagraph (e) is yes, identify:
 - (i) the documents generated;
 - (ii) where such documents went; and
 - (iii) who currently has the documents in their possession, custody or control?

ANSWER:

Ford refers Plaintiff to, and incorporates herein, its answer and objections to Interrogatory No. 11.

INTERROGATORY NO. 13:

Please state whether you, your agents or your counsel, have paid money and/or retained the services of Environ, Inc., including, but not limited to, anyone affiliated with, associated with or employed by Environ, Inc. (collectively, "Environ, Inc.") from its inception until the present date.

ANSWER:

Ford has not identified any expert witness at Environ, Inc. to be called at the trial of this lawsuit. As such, the information sought in this interrogatory, is neither relevant to the subject matter of this action nor reasonably calculated to lead to the discovery of admissible evidence. Ford also objects to this interrogatory because it is vague, ambiguous, overly broad, unduly burdensome, and seeks information that is neither relevant to the subject matter of this action nor reasonably calculated to lead to the discovery of admissible evidence. This interrogatory is not limited to a reasonable time frame or scope, and instead seeks information pertaining to whether Ford ever paid money and/or retained the services of Environ, Inc., for any purpose whatsoever, if at all, at any time from the organization's inception until the present date, and without any reasonable limitation to those payments made in connection with the defense of asbestos friction litigation claims or to those particular experts identified in this matter. Ford further objects to this interrogatory to the extent it seeks information that is protected from disclosure by the attorney-client privilege, work product doctrine, consulting expert privilege, or any other applicable privilege. Ford also objects to this interrogatory to the extent it calls for expert opinions, materials and conclusions and therefore prematurely seeks the disclosure of information which is properly the subject of expert witness testimony and/or reports.

INTERROGATORY NO. 14:

If your response to the Interrogatory No. 13 is yes, please:

- (a) Identify each and every transaction (*i.e.*, all instances where money was paid to Environ, Inc.. and/or Environ, Inc. was retained) between you, your agents or your counsel with Environ, Inc.?
- (b) State to whom (individual or company) a fee, money, retainer and/or the like was paid?

- (c) State the amount of each and every fee, money, retainer and/or the like?
- (d) State for what purpose said fee, money, retainer and/or the like was paid to these individuals and/or the companies?
- (e) State whether any documentation was generated from the transaction(s), including, but not restricted to invoices, reports, notes and the like?
- (f) If your response to Subparagraph (e) is yes, identify:
 - (i) the documents generated;
 - (ii) where such documents went; and
 - (iii) who currently has the documents in their possession, custody or control?

ANSWER:

Ford refers Plaintiff to, and incorporates herein, its answer and objections to Interrogatory No. 13.

INTERROGATORY NO. 15:

Please state whether you, your agents or your counsel, have paid money and/or retained the services of Material Analytical Services, Inc., including, but not limited to, anyone affiliated with, associated with or employed by Material Analytical Services, Inc. (collectively, "MAS, Inc.") from its inception until the present date.

ANSWER:

Ford has not identified any expert witness at Material Analytical Services, Inc. to be called at the trial of this lawsuit. As such, the information sought in this interrogatory, is neither relevant to the subject matter of this action nor reasonably calculated to lead to the discovery of admissible evidence. Ford also objects to this interrogatory because it is vague, ambiguous, overly broad, unduly burdensome, and seeks information that is neither relevant to the subject matter of this action nor reasonably calculated to lead to the discovery of admissible evidence. This interrogatory is not

limited to a reasonable time frame or scope, and instead seeks information pertaining to whether Ford ever paid money and/or retained the services of Material Analytical Services, Inc., for any purpose whatsoever, if at all, at any time from the organization's inception until the present date, and without any reasonable limitation to those payments made in connection with the defense of asbestos friction litigation claims or to those particular experts identified in this matter. Ford further objects to this interrogatory to the extent it seeks information that is protected from disclosure by the attorney-client privilege, work product doctrine, consulting expert privilege, or any other applicable privilege. Ford also objects to this interrogatory to the extent it calls for expert opinions, materials and conclusions and therefore prematurely seeks the disclosure of information which is properly the subject of expert witness testimony and/or reports.

INTERROGATORY NO. 16:

If your response to the Interrogatory No. 15 is yes, please:

- (a) Identify each and every transaction (*i.e.*, all instances where money was paid to Material Analytical Services, Inc. and/or Material Analytical Services, Inc. was retained) between you, your agents or your counsel with Material Analytical Services, Inc.?
- (b) State to whom (individual or company) a fee, money, retainer and/or the like was paid?
- (c) State the amount of each and every fee, money, retainer and/or the like?
- (d) State for what purpose said fee, money, retainer and/or the like was paid to these individuals and/or the companies?
- (e) State whether any documentation was generated from the transaction(s), including, but not restricted to invoices, reports, notes and the like?
- (f) If your response to Subparagraph (e) is yes, identify:
 - (i) the documents generated;
 - (ii) where such documents went; and
 - (iii) who currently has the documents in their possession, custody or control?

ANSWER:

Ford refers Plaintiff to, and incorporates herein, its answer and objections to Interrogatory No. 15.

INTERROGATORY NO. 17:

Please state whether you, your agents or your counsel, have paid money and/or retained the services of R J Lee Group, Inc., including, but not limited to, anyone affiliated with, associated with or employed by R J Lee Group, Inc. (collectively, "R J Lee Group") from its inception until the present date.

ANSWER:

Ford has not identified any expert witness at R J Lee Group, Inc., to be called at the trial of this lawsuit. As such, the information sought in this interrogatory, is neither relevant to the subject matter of this action nor reasonably calculated to lead to the discovery of admissible evidence. Ford also objects to this interrogatory because it is vague, ambiguous, overly broad, unduly burdensome, and seeks information that is neither relevant to the subject matter of this action nor reasonably calculated to lead to the discovery of admissible evidence. This interrogatory is not limited to a reasonable time frame or scope, and instead seeks information pertaining to whether Ford ever paid money and/or retained the services of R J Lee Group, Inc., for any purpose whatsoever, if at all, at any time from the organization's inception until the present date, and without any reasonable limitation to those payments made in connection with the defense of asbestos friction litigation claims or to those particular experts identified in this matter. Ford further objects to this interrogatory to the extent it seeks information that is protected from disclosure by the attorney-client privilege, work product doctrine, consulting expert privilege, or any other applicable privilege.

Ford also objects to this interrogatory to the extent it calls for expert opinions, materials and conclusions and therefore prematurely seeks the disclosure of information which is properly the subject of expert witness testimony and/or reports.

INTERROGATORY NO. 18:

If your response to the Interrogatory No. 17 is yes, please:

- (a) Identify each and every transaction (*i.e.*, all instances where money was paid to R J Lee Group, Inc. and/or R J Lee Group, Inc. was retained) between you, your agents or your counsel with R J Lee Group, Inc.?
- (b) State to whom (individual or company) a fee, money, retainer and/or the like was paid?
- (c) State the amount of each and every fee, money, retainer and/or the like?
- (d) State for what purpose said fee, money, retainer and/or the like was paid to these individuals and/or the companies?
- (e) State whether any documentation was generated from the transaction(s), including, but not restricted to invoices, reports, notes and the like?
- (f) If your response to Subparagraph (e) is yes, identify:
 - (i) the documents generated;
 - (ii) where such documents went; and
 - (iii) who currently has the documents in their possession, custody or control?

ANSWER:

Ford refers Plaintiff to, and incorporates herein, its answer and objections to Interrogatory No. 17.

INTERROGATORY NO. 19:

Please state whether you, your agents or your counsel, have paid money and/or retained the services of the following individuals:

- (a) Marek Banasik

- (b) Charles Blake, CIH
- (c) Gregor P. Brorby
- (d) Kelly Butnor
- (e) Valerie A. Craven
- (f) Brent Finley, Ph.D., DABT
- (g) Herman Gibb, Ph.D.
- (h) Michael Goodman, M.D., M.P.H.
- (i) Raymond D. Harbison
- (j) Patrick Hessel, Ph.D.
- (k) D.E. Hickish
- (l) Patric A. Kelsh
- (m) K.L. Knight
- (n) Elizabeth T. Lu
- (o) Fionna S. Mowat
- (p) Dennis Paustenbach, Ph.D., CIH, DAIBT
- (q) Sheldon Rabinovitz, Ph.D., CIH
- (r) Dr. Mark Roberts
- (s) K. Rodelsperger
- (t) Victor Roggli, M.D.
- (u) Patrick Sheehan, Ph.D.
- (v) Thomas Sporn, M.D.
- (w) Mary Jane Teta, Ph.D., MPA
- (x) Drew VanOrden

(y) H.J. Weitowitz

ANSWER:

With respect to Brent Finley, Ph.D., DABT, Ford refers Plaintiff to the total amount paid to Exponent in connection with the defense of asbestos friction litigation claims from January 1, 2001 through 2004, when Brent Finley was employed by Exponent. Ford also refers Plaintiff to the total amount paid to Chemrisk in connection with the defense of asbestos friction litigation claims from 2005 through the present when Brent Finley was employed by Chemrisk. Accordingly, Ford refers Plaintiff to its responses and objections to Interrogatory Nos. 3 and 5.

With respect to Herman Gibb, Ph.D., Ford refers Plaintiffs to the total amount paid to Tetra Tech Sciences in connection with the defense of asbestos friction litigation claims, with whom Herman Gibb was employed. Accordingly, Ford refers Plaintiff to, and incorporates herein, its answer and objections to Interrogatory No. 7.

With respect to the remaining individuals, Ford has not identified any of these individuals as expert witness to be called at the trial of this lawsuit. As such, the information sought in this interrogatory, is neither relevant to the subject matter of this action nor reasonably calculated to lead to the discovery of admissible evidence.

Ford also objects to this interrogatory because it is vague, ambiguous, overly broad, unduly burdensome, and seeks information that is neither relevant to the subject matter of this action nor reasonably calculated to lead to the discovery of admissible evidence. This interrogatory is not limited to a reasonable time frame or scope, and instead seeks information pertaining to whether Ford ever paid money and/or retained the services of 25 individuals listed above, for any purpose whatsoever, if at all, at any time during Ford's entire corporate history, and without any reasonable limitation to those payments made in connection with the defense of asbestos friction litigation

claims or to those particular experts identified in this matter. Ford further objects to this interrogatory to the extent it seeks information that is protected from disclosure by the attorney-client privilege, work product doctrine, consulting expert privilege, or any other applicable privilege. Ford also objects to this interrogatory to the extent it calls for expert opinions, materials and conclusions and therefore prematurely seeks the disclosure of information which is properly the subject of expert witness testimony and/or reports.

INTERROGATORY NO. 20:

If your response to any individual listed in Interrogatory No. 19 is yes, please:

- (a) Identify the transaction(s) between you, your agents or your counsel with the respective individuals set forth in Interrogatory No. 19, subparagraphs (a) to (y)?
- (b) State to whom a fee, money, retainer and/or the like was paid?
- (c) State the amount of each and every fee, money, retainer and/or the like?
- (d) State for what purpose said fee, money, retainer and/or the like was paid to these individuals and/or the companies?
- (e) State whether any documentation was generated from the transaction(s), including, but not restricted to invoices, reports, notes and the like?
- (f) If your response to Subparagraph (e), immediately above, is yes, identify: (i) the documents generated; (ii) where such documents went; and (iii) who currently has the documents in their possession, custody or control?

ANSWER:

Ford refers Plaintiff to, and incorporates herein, its answer and objections to Interrogatory No. 19.

INTERROGATORY NO. 21:

If your answer to any individual listed in subparagraphs (a) to (y) of Interrogatory No. 19 is no, please indicate whether or not you paid any money, fees or the like to any of the respective

individual's employers and/or consulting companies.

ANSWER:

Ford refers Plaintiff to, and incorporates herein, its answer and objections to Interrogatory No. 19.

INTERROGATORY NO. 22:

If your response to Interrogatory No. 21 is yes, please:

- (a) Identify the transaction(s) between you, your agents or your counsel with the respective individual's employers and/or consulting companies set forth in Interrogatory No. 19, subparagraphs (a) to (y)?
- (b) State to whom a fee, money, retainer and/or the like was paid?
- (c) State the amount of each and every fee, money, retainer and/or the like?
- (d) State for what purpose said fee, money, retainer and/or the like was paid to these individuals and/or the companies?
- (e) State whether any documentation was generated from the transaction(s), including, but not restricted to invoices, reports, notes and the like?
- (f) If your response to Subparagraph (e), immediately above, is yes, identify: (i) the documents generated; (ii) where such documents went; and (iii) who currently has the documents in their possession, custody or control?

ANSWER:

Ford refers Plaintiff to, and incorporates herein, its answer and objections to Interrogatory Nos. 19 and 21.

STATE OF MICHIGAN)
) ss.
COUNTY OF WAYNE)

MATTHEW FYIE, being duly sworn, deposes and says that the deponent is an authorized agent of Ford Motor Company, and that the deponent verifies the foregoing FORD MOTOR COMPANY'S RESPONSES TO PLAINTIFF'S REQUEST FOR PRODUCTION TO DEFENDANT FORD MOTOR COMPANY REGARDING PAYMENTS TO CERTAIN DOCTORS, SCIENTISTS, AUTHORS AND/OR ORGANIZATIONS for and on behalf of Ford Motor Company and is duly authorized so to do; that the matters stated therein are not within the personal knowledge of the deponent; that the facts stated therein have been assembled by authorized employees and counsel of Ford Motor Company, and the deponent is informed that the facts stated therein are true, correct and complete to best of my knowledge and belief.

Subscribed and sworn to before me this

_____ day of _____ 2014

Nicole M. Munding, Notary Public
State of Michigan, County of Washtenaw
My Commission Expires: July 15, 2019
Acting in County of Wayne

IN THE CIRCUIT COURT OF THE CITY OF ST. LOUIS
STATE OF MISSOURI

Ricky R. Evans,	)	
	)	
Plaintiff,	)	
	)	Cause No. 1322-CC00881
vs.	)	
	)	
Union Carbide Corporation, et al.,	)	
	)	<i>Asbestos Personal Injury</i>
Defendants.	)	

**FORD MOTOR COMPANY'S RESPONSES TO PLAINTIFF'S
REQUEST FOR PRODUCTION TO DEFENDANT
FORD MOTOR COMPANY REGARDING PAYMENTS
TO CERTAIN DOCTORS, SCIENTISTS, AUTHORS AND/OR ORGANIZATIONS**

Defendant Ford Motor Company ("Ford") herein submits its Response to Plaintiff's Request for Production to Defendant Ford Motor Company Regarding Payments to Certain Doctors, Scientists, Authors and/or Organizations.

PRELIMINARY STATEMENT

Ford's responses to Plaintiff's requests for production have been prepared in accordance with the *Missouri Rules of Civil Procedure*, pursuant to a reasonable and duly diligent investigation and search in the United States for the information requested. These responses are based upon facts known or believed by Ford at the time of responding to 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, and Ford expressly reserves the right to supplement or amend these responses should additional and/or contradictory information come to light at a later date.

RESPONSES TO INDIVIDUAL REQUESTS FOR PRODUCTION

Subject to the foregoing statements and objections, Ford responds to each individual request for production of documents as follows:

REQUEST NO. 1:

Please produce any and all documents as identified in response to subparagraphs (f) of the following Interrogatories served herewith: Interrogatory Nos. 2, 4, 6, 8, 10, 12, 14, 16, 18, 20, and 22.

RESPONSE:

To the extent Ford refers to a document in its answers to Plaintiff's Interrogatories, Ford will make that document available to Plaintiff. Ford also refers Plaintiff to, and incorporates herein, its answers and objections to Plaintiff's Interrogatories, served concurrently herewith.

REQUEST NO. 2:

Only to the extent that all billing and payment records to experts and expert consulting companies/firms are not being produced in response to Request for Production No. 1 hereof, please produce any and all billing and payment records for any expert and/or expert consulting company/firm paid by you, your agent and/or your counsel to study, research, and/or author reports or articles concerning asbestos, asbestos-related diseases, lung cancer and/or mesothelioma, including, but not limited tax reporting documents, such as Form 1099's, invoices, bills and/or checks.

RESPONSE:

Ford refers Plaintiff to, and incorporates herein, its response and objections to Request No. 1.

Ford otherwise objects to this request because it is vague, ambiguous, overly broad, unduly burdensome, and seeks information that is neither relevant to the subject matter of this

action nor reasonably calculated to lead to the discovery of admissible evidence. This request is not limited to a reasonable time frame or scope, and instead seeks any and all billing and payment records for any expert and/or expert consulting company/firm paid by Ford or Ford's counsel to study, research, and/or author reports or articles concerning asbestos, asbestos-related diseases, lung cancer and/or mesothelioma, including, but not limited to tax reporting documents, such as Form 1099's, invoices, bills and/or checks, if any at all, at any time during Ford's entire corporate history, and without any reasonable limitation. Ford further objects to this request to the extent it seeks information that is protected from disclosure by the attorney-client privilege, work product doctrine, consulting expert privilege, or any other applicable privilege. Ford also objects to this request to the extent it calls for expert opinions, materials and conclusions and therefore prematurely seeks the disclosure of information which is properly the subject of expert witness testimony and/or reports.

REQUEST NO. 3:

Only to the extent that all communications between you, your agents and your counsel with experts and expert consulting companies/firms are not being produced in response to Request for Production No. 1 hereof, please produce any and all communications, electronic and otherwise, and any other documents related to such communications, for any expert and/or expert consulting company/firm paid by you, your agent and/or your counsel to study, research, and/or author reports or articles concerning asbestos, asbestos-related diseases, lung cancer and/or mesothelioma.

RESPONSE:

Ford refers Plaintiff to, and incorporates herein, its response and objections to Request No. 1.

Ford otherwise objects to this request because it is vague, ambiguous, overly broad, unduly burdensome, and seeks information that is neither relevant to the subject matter of this action nor reasonably calculated to lead to the discovery of admissible evidence. This request is not limited to a reasonable time frame or scope, and instead seeks any and all communications, electronic and otherwise, and any other documents related to such communications, for any expert and/or expert consulting company/firm paid by Ford or Ford's counsel to study, research, and/or author reports or articles concerning asbestos, asbestos-related diseases, lung cancer and/or mesothelioma, if any at all, at any time during Ford's entire corporate history, and without any reasonable limitation. Ford further objects to this request to the extent it seeks information that is protected from disclosure by the attorney-client privilege, work product doctrine, consulting expert privilege, or any other applicable privilege. Ford also objects to this request to the extent it calls for expert opinions, materials and conclusions and therefore prematurely seeks the disclosure of information which is properly the subject of expert witness testimony and/or reports.

STATE OF MICHIGAN)
) ss.
COUNTY OF WAYNE)

MATTHEW FYIE , being duly sworn, deposes and says that the deponent is an authorized agent of Ford Motor Company, and that the deponent verifies the foregoing FORD MOTOR COMPANY'S RESPONSES TO PLAINTIFF'S REQUEST FOR PRODUCTION TO DEFENDANT FORD MOTOR COMPANY REGARDING PAYMENTS TO CERTAIN DOCTORS, SCIENTISTS, AUTHORS AND/OR ORGANIZATIONS for and on behalf of Ford Motor Company and is duly authorized so to do; that the matters stated therein are not within the personal knowledge of the deponent; that the facts stated therein have been assembled by authorized employees and counsel of Ford Motor Company, and the deponent is informed that the facts stated therein are true, correct and complete to best of my knowledge and belief.

Subscribed and sworn to before me this

_____ day of _____, 2014

Nicole M. Munding, Notary Public
State of Michigan, County of Washtenaw
My Commission Expires: July 15, 2019
Acting in County of Wayne