

State whether or not the Defendant had any knowledge of any articles being printed in industry trade journals, essays, memoranda and other similar sources pertaining to the hazardous potentials of asbestos and which of such articles were received by you.

ANSWER: Ford objects to this Interrogatory. It is vague, ambiguous, burdensome and overly broad. It is not feasible for Ford to make a full response to this Interrogatory because of the number of years and people potentially involved and the corporate records. Ford can report that it is unaware of any of its officers, directors, or employees having belonged to or belonging to the Institute of Occupational and Environmental Health of Quebec Asbestos Mining Association; Quebec Asbestos Mining Association; Brake Linings Manufacturers Association; Friction Materials Standards Institute, Inc.; Grinding Wheel Institute; Asbestos Textile Institute; Asbestos Information Association of North America; Trudeau Foundation; Asbestos Information Association and Asbestos Brake Lining Manufacturers Institute.

13. Please state if Defendant, or anyone on behalf of Defendant, including any organization, group, inter-company or industrial organization to which the Defendant belonged, conducted, sponsored, researched or contributed financially to any studies or research to determine the relationship, if any, between exposure to asbestos fibers or products and asbestos and lung cancer. If so, please state: