

In Re: All Asb.

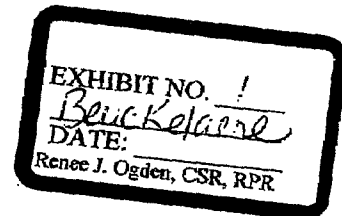


FYI

From the desk of:
Ted N. Gianaris

December 7, 2005

Camille CribareMello
Ryan McQueeney
Sanchez Daniels & Hoffman
333 West Wacker Drive, Suite 500
Chicago, Illinois 60606



RE: Ford Motor Company, General Motors Corporation and Detroit Diesel Company

Dear Ms. CribareMello and Mr. McQueeney:

We look forward to your timely response to our written discovery. Also, we need to depose all witnesses, fact and/or expert, which you plan to call at trial next year on behalf of **Ford, General Motors and/or Detroit Diesel**. It is very important we receive their reports and start deposing these witnesses very soon. There is a general tendency in this litigation to put off responding to discovery and producing experts in anticipation of settlement negotiations. We cannot allow ourselves to get lulled into such a potential trap. We must complete all these depositions soon. Furthermore, I would like both Ford and General Motors to each designate a witness or witnesses to be deposed on behalf of the respective corporations on the following topics:

- (1) the health and safety aspects of your companies' asbestos-containing products;
- (2) efforts and attempts your company made to create, or include for sale on your vehicles or as replacement parts, non-asbestos containing friction materials, including the technical and engineering feasibility of such non-asbestos friction products in the 1960s, 1970s, and 1980s. The safety aspects, both pro and con, of said non-asbestos friction products, and the cost of said non-asbestos friction products.
- (3) Warnings or cautions provided to customers, mechanics or users of your vehicles or friction materials regarding any potentially harmful health effects of your asbestos-containing products. Why these warnings or cautions were made when they were made and how the decision was made regarding what language to include in said caution or warning.

Page 1 of 2

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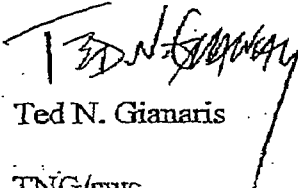
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December 7, 2005
Page 2

- (4) Membership in, activities in and relationship with the National Safety Council, the Friction Material Standards Institute, The Asbestos Information Association, and the Industrial Hygiene Foundation.

Please let me know in the next ten (10) days when we can start deposing the corporation on these issues.

Sincerely,


Ted N. Gianaris
TNG/swc