

IN RE:	*	IN THE
PERSONAL INJURY AND	*	CIRCUIT COURT
WRONGFUL DEATH	*	FOR
ASBESTOS CASES	*	BALTIMORE CITY

KEITH K. GREWE, SR., et al.	*	APRIL, 1996 TRIAL CLUSTER
Plaintiffs	*	CLUSTER 96112701
v.	*	JUDGE EDWARD J. ANGELETTI
ACandS, INC., et al.	•	
Defendants	•	

**FORD MOTOR COMPANY'S RESPONSES TO
PLAINTIFFS' MASTER REQUESTS FOR PRODUCTION OF DOCUMENTS**

Responses provided herein have been prepared pursuant to a reasonable and duly diligent investigation and search for the information requested. For many years, Ford has had several hundred thousand employees. Many employees have worked at several of Ford's facilities. In conducting its business, Ford has each year created many millions of documents that have been kept in numerous locations and have been moved as organization changed and as employees changed jobs. Accordingly, Ford does not represent that these responses contained herein provide all information requested; rather, these responses reflect information obtained before this date by Ford pursuant to a reasonable

SCF-FORD-3670

RESPONSE TO REQUEST FOR PRODUCTION 6:

Objections: Lack of Relevance. Burden. Overly Broad.
Lack of Particularity. Premature.

REQUEST FOR PRODUCTION 7.

Produce all documents, including, but not limited to, correspondence, memoranda, specifications and blueprints that refer, relate or pertain to the design, preparation, development, and testing of your asbestos products.

RESPONSE TO REQUEST FOR PRODUCTION 7:

Objections: Lack of Relevance. Burden. Overly Broad.
Lack of Particularity. Premature.

REQUEST FOR PRODUCTION 8.

Produce all documents that refer, relate or pertain to the chemical composition and the product formula of each of your asbestos products.

RESPONSE TO REQUEST FOR PRODUCTION 8:

Objections: Lack of Relevance. Burden. Overly Broad.
Lack of Particularity. Premature.

REQUEST FOR PRODUCTION 9.

Produce all documents that refer, relate or pertain to the type and source of asbestos, i.e., chrysotile, amosite, crocidolite, actinolite, anthophyllite or tremolite, and the percentage of each such asbestos fiber, by weight and volume, contained in each of your asbestos products.

RESPONSE TO REQUEST FOR PRODUCTION 9:

Vehicles manufactured by Ford incorporated brake friction products such as linings, which are composed, in part, of asbestos. Ford understands the type of asbestos fibers in these to be chrysotile. Because Ford does not manufacture these,

it does not know percentages of asbestos that they contain, but, generally, it is thought to be, for example, between 40% and 60% asbestos, by weight, in brake linings.

A list of some of Ford's suppliers is offered.

REQUEST FOR PRODUCTION 10.

Produce all assignments, agreements, licenses, contracts and other documents under which you have distributed or sold any asbestos products which were mined, manufactured, produced, fabricated, imported, converted, compounded, processed, sold, merchandised, supplied or otherwise placed in the stream of commerce by persons and/or business entities other than you.

RESPONSE TO REQUEST FOR PRODUCTION 10:

Objections: Lack of Relevance. Burden. Overly Broad.
Lack of Particularity. Premature.

REQUEST FOR PRODUCTION 11.

Produce all correspondence or other documents that refer, relate or pertain to any assignments, agreements licenses and contracts under which you have distributed or sold any asbestos products which were mined, manufactured, produced, fabricated, imported, converted, compounded, processed, sold, merchandised, supplied or otherwise placed in the stream of commerce by persons and/or business entities other than you.

RESPONSE TO REQUEST FOR PRODUCTION 11:

Objections: Lack of Relevance. Burden. Overly Broad.
Lack of Particularity. Premature.

REQUEST FOR PRODUCTION 12.

Produce all assignments, agreements, licenses, contracts and other documents under which other persons and/or business entities have sold or distributed any of your asbestos products.

RESPONSE TO REQUEST FOR PRODUCTION 12:

Objections: Lack of Relevance. Burden. Overly Broad.
Lack of Particularity. Premature.

A list of some Ford Authorized Remanufacturers is offered.

STATE OF MICHIGAN)

) SS.

COUNTY OF WAYNE)

JEFFREY F. HARRIS

, being duly sworn, deposes and says that he is an authorized agent of Ford Motor Company and that he verifies the foregoing FORD MOTOR COMPANY'S RESPONSES TO PLAINTIFFS' MASTER REQUESTS FOR PRODUCTION OF DOCUMENTS and is duly authorized to do so; that the matters stated therein are not within the personal knowledge of deponent, that the facts stated therein have been assembled by authorized employees and counsel of Ford Motor Company, and deponent is informed that the facts stated therein are true.

FORD MOTOR COMPANY

By: *J. Harris*

Subscribed and sworn to before me
this 18 day of Dec, 1995.

Maria J. Leas
Notary Public

____ County, _____

My Commission Expires: _____

ALC/18260/9999/DV0/1

Date. January 4, 1996

Respectfully submitted,

Steven R. Williams

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Attorneys for Ford Motor Company

RESPONSE TO REQUEST FOR PRODUCTION

NO. 9

FORD MOTOR COMPANY

Brake Assembly and Lining Suppliers
(Vehicles Assembled by Ford in North America)

Original: 12-20-82
Revised: 02-24-83
Revised: 05-01-95