



Inter Office

TO: S. F. Svoboda
Room B-4
FPSD - GO

Office of the General Counsel
February 24, 1981

FROM: W. Jones
Product Litigation

SUBJECT: Rotunda Brake & Clutch Service Vacuum
and Brake Washer

Pursuant to our conversation, the following is a listing of information requested concerning the Rotunda Brake & Clutch Service Vacuum and the Brake Washer. As previously explained, the Company is involved in several multi-million dollar lawsuits in which the plaintiffs have alleged fatality due to prolonged exposure to Company automotive asbestos components, such as brake linings, clutch facings, etc.

For our defense of these lawsuits it is extremely important that we secure the assistance of your department to provide background information, documentation and expertise concerning subject equipment.

1. Supply all contracts or purchase order files substantiating the Company's relationship with Tempo Products, Inc., Cleveland, Ohio, and Kleer-Flo Products. It is our understanding that these two companies are the sole suppliers of subject equipment, and it is also our understanding that these two products are the only asbestos related products marketed by Ford Rotunda.

2. Please provide all Company correspondence which preceded the initiation of the noted contracts, and the effective date of such contracts.

Rev 3. Advise as to the advertising materials available and the content of such advertising concerning subject equipment. Also provide representative samples, if available. Please provide names and titles of those responsible for ad campaign and contents of advertising materials. Do advertising agreements exist between Ford Rotunda and the noted manufacturers?

4. Who is responsible for the content of the caution or warning labels affixed to the equipment as noted? Please provide representative copies.

5. Are instructive materials, including warnings or caution labels, affixed to or inserted into the equipment packaging?

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6. Who is responsible for the packaging of the subject equipment? Rotunda or the manufacturer?

7. Please outline method of distribution of subject equipment. Is this equipment available to those other than authorized or franchised Ford/Lincoln dealerships? How many have been purchased by Ford Rotunda?

8. Does Rotunda market or manufacture equipment for turning brake drums and rotors for drum sizing?

9. Does Rotunda market or manufacture face masks to be worn specifically as a preventive filter against asbestos dust or air borne fibers?

10. Are there any plans for the marketing or production of additional equipment aimed at reducing the risk of exposure to asbestos dust?

This information is needed by March 2, 1981, and I would appreciate your immediate attention. Please do not hesitate to contact me if there are further questions.

W. Jones
Wanda Jones
Litigation Assistant
(42476)

WJ/dw

cc: G. G. Clickard
Rm. B-4 FPSD-GO

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