UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

GLORIA VAUGHN, ET AL.,	)	
	)	
Plaintiffs,	)	
vs.	)	No. 82-1655-C(A)
	)	
RAYMARK INDUSTRIES, INC., et al.,	)	
	)	
	)	
Defendants.	)	

RECEIVED
MAR 14 1983
BLATT & FALES

ANSWERS OF DEFENDANT FORD MOTOR COMPANY TO PLAINTIFFS' INTERROGATORIES

COMES NOW Defendant Ford Motor Company ("Ford"), by and through its attorneys and for its answers to Plaintiffs' Interrogatories, states as follows:

1. Has Defendant, at any time, engaged in the manufacture of brake linings and clutches containing asbestos or asbestos fibers, and if your answer is in the affirmative, state:

a) Where the brake linings or clutches were manufactured.

b) How long Defendant has manufactured same (give inclusive dates.)

c) Whether Defendant has supplied these brake linings or clutches to any of the other Defendants since 1960, and when these transactions took place, where, and the compensation paid for the manufactured asbestos containing brake linings or clutches.

d) Whether any warnings, cautions, caveats or directions accompanied the materials referred to in c) and the dates these first appeared.

ANSWER: Ford did not and does not manufacture or process asbestos into brake linings. Ford buys brake assemblies which include the linings.

(a) - (d) Not applicable.

2. a) From what source or sources, if any, did your company obtain mined asbestos since 1960?

b) Were there any warnings, cautions, caveats, or directions accompanying the material referred to in a) above and the nature and extent of said warnings, cautions, caveats or direction accompanying said asbestos.

ANSWER: (a) See No.1. Ford buys brake assemblies and brake linings. A list of Ford's suppliers for these products and the types of vehicles on which each product was used between 1962 and 1982 is at Attachment 1.

(b) To the best of Ford's present knowledge, none of its suppliers issued warnings concerning a potential health hazard regarding brake linings until publication of an article by Dr. Selikoff in the mid-1970's.

3. If the answer to one or more of the last two questions is affirmative, please state as to each affirmative answer the following:

a) The trade or brand name of such product mined, manufactured and/or marketed.

ANSWER: See Attachment 1.

b) The dates each such products was placed on the market:

ANSWER: See Attachment 1.

c) The dates each such products was withdrawn from the market.

ANSWER: See Attachment 1.

d) A description of the physical (the chemical) composition of each such product including the type of asbestos contained in each such product including the type of asbestos contained in each such product (i.e., amosite, chrysotile or crocidolite) and the quantitative percentage of asbestos in each product.

ANSWER: Apparently; Ford knew that the brake linings contained a quantity of asbestos. Apparently, Ford did not know the physical (the chemical) composition and the quantitative percentage of asbestos in the products. This seems to have been regarded by

the suppliers as proprietary information. It is likely that it has been known that, although there are different minerals of fibrous structure in the asbestos group, the variety used in brake linings is chrysotile.

e) A description of the physical appearance of each such product.

ANSWER: A brake lining is a narrow rectangle shaped to fit on a curved surface.

f) A detailed description of the intended use of each such product.

ANSWER: Brake linings assist in braking through friction.

g) The name of the manufacturer of each such product.

ANSWER: See Attachment 1.

h) The mining or milling concern from which the raw asbestos fiber was obtained.

ANSWER: Unknown. See Attachment 1.

4. From 1930 until the present, did the asbestos products manufactured or distributed to you, contain any warnings, caution, caveat or other statement on the product or its packaging; if so, state:

ANSWER: See 1. With respect to brake linings, Ford's answer is yes.

a) When did the warnings first appear.

ANSWER: When in the mid-1970's, Ford became aware of the alleged potential health hazard of asbestos associated with brake linings, there was already a general awareness, existing government regulations, and other warnings and instructions furnished to users.

Ford did not manufacture the brake linings or the cartons in which they were shipped. With respect to brake linings sold as components of new vehicles, Ford is unaware of any feasible and useful method of labeling the component part. With respect to after-market products sold by Ford, labels were placed on cartons in 1980.

b) What was the precise wording of the warning when it first appeared.

ANSWER: See 4 (a). Those labels read along the lines such as:

CAUTION: Contains asbestos fibers. Avoid creating dust. Breathing asbestos dust may cause serious bodily harm.

When servicing this brake lining or any component related to it or located near it, prevent asbestos dust from becoming airborne by vacuuming the assembly with an industrial type vacuum cleaner equipped with a highly efficient filter system and by washing the assembly with an appropriate brake parts washer if necessary. Never remove dust or dirt from this assembly by blowing with compressed air.

c) Was the warning altered, amended or changed in any manner. If so, how and when.

ANSWER: See 4 (a).

d) Where was the warning located on the product or packaging.

ANSWER: See 4 (a).

e) When did you become aware that warnings were placed on products distributed by other Defendants? State the reason warnings of the other Defendants were not placed on your products.

ANSWER: Unknown at this time.

f) State the manner in which your product is shipped and the type of container it is shipped in to retailers.

ANSWER: With respect to after market brake linings distributed by Ford, the parts are in cartons.

g) State whether any industrial psychologists or human factor engineers were consulted prior to utilizing such warnings, cautions, etc.

ANSWER: Unknown at this time.

5. Have you received notice that any other persons including any of your employees have claimed injury as a result of using asbestos products manufactured by your company.

ANSWER: Ford does not manufacture asbestos products.

6. Please describe in detail the type of packages in which Defendant has sold asbestos material, listing the dates each type of package was used, a physical description thereof, a description of any printed material or trademarks that appeared thereon and a description of any warning or warning labels that appeared thereon.

ANSWER: See 4 (a), (b) and (f).

7. Did you receive any reports or communications from your Worker's Compensation insurance carrier or products liability insurance carrier with regard to the hazards incident to the use of asbestos containing products? If so, please state who had possession of said reports, the location of said reports and the substance of the contents of said reports, listing for each such report the respective insurance company, its address, and the agent signing such correspondence.

ANSWER: Unknown at this time.

8. Has the Defendant imported asbestos or asbestos materials since 1960? If the answer is in the affirmative, state:

ANSWER: Apparently, no. See 1 and 2 and Attachment 1.

a) From where the asbestos or asbestos materials were imported.

ANSWER: Not applicable.

b) How long the Defendant has imported asbestos or asbestos materials.

ANSWER: Not applicable.

c) Whether the Defendant has supplied this imported asbestos or asbestos materials to any of the other Defendants since 1960, when there transactions took place and where.

ANSWER: Apparently, no.

d) Whether any warnings, cautions, caveats or directions accompanied the materials referred to in c) and the dates these first appeared.

ANSWER: Not applicable.

9. State whether the Defendant manufactured asbestos containing products for a company but placed said company's labels, logos, or containers on said products and if so, list each company.

ANSWER: No.

10. If the answer to the preceding Interrogatory is in the affirmative, state:

a) Where the Defendant has sold or distributed such products since 1960.

ANSWER: Not applicable.

11. If the Defendant has discontinued manufacturing and/or selling asbestos products, please state the reason or reasons therefor.

ANSWER: Not applicable.

12. Please state the names of trade association periodicals to which the Defendant subscribed from 1928 to the present date.

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:

a) The type of nature of the studies.

ANSWER: See 18.

b) By whom the research or studies were conducted, give the complete names and addresses.

ANSWER: See 18.

c) The dates that each such test or study was conducted.

ANSWER: Commencing in 1972, Ford participated in and provided partial funding for studies done by Dr. Irving Selikoff and others at the Mount Sinai School of Medicine in New York which culminated in the publication of several papers, the first of which was Asbestos Exposure During Brake Lining Maintenance and Repair appearing in "Environmental Research", Vol. 12, pages 110-128 (1976). The work done by Dr. Selikoff originally was a study of environmental pollution caused by the asbestos in brake linings. The study later focused on the occupational exposure of mechanics during brake repair and maintenance. Ford's Research and Engineering Department and Industrial Hygiene Department was advised of the studies undertaken by Mount Sinai.

d) The complete results of each test or study.

ANSWER: Ford objects to this Interrogatory on the grounds that it is vague, ambiguous, burdensome and overly broad.

Subject to and without waiving the foregoing objections, see: A.N. Rohl, A.M. Langer, Mary S. Wolff and Irving Weisman, "Asbestos Exposure During Brake Lining Maintenance and Repair", Environmental Research, Vol. 12, pp.110-128 (1976). See 18.

e) The recommendation of the study or tests.

ANSWER: See 18.

f) The resulting implementation of the studies or tests by Defendant.

ANSWER: See 4 and 18.

g) The date when first implemented.

ANSWER: See 4 and 18.

h) Supply copies of reports of the research department, pertaining to the use by the corporation of asbestos in their manufactured products.

ANSWER: Ford objects to this Interrogatory as vague, over broad and unintelligible.

14. Please state whether any of the distributors of your asbestos containing products were provided with any special instructions, oral or written, in regard to utilizing said products in a manner so as to avoid exposing workers to amounts of dust exceeding the MAC or TLV. If so, please state:

ANSWER: Ford objects to this Interrogatory on the grounds that it is overly broad, vague, ambiguous, and seeks information that is irrelevant, immaterial, and not calculated to lead to the discovery of admissible evidence.

Subject to the foregoing objection, on October 24, 1975, a Technical Service Bulletin was issued by the Parts and Service Division to Ford dealerships recommending a vacuum cleaner be used for cleaning brakes. In January of 1976, a follow-up Technical Service Bulletin was issued to the dealers indicating that Ford recommended the use of an industrial vacuum cleaner in brake cleaning operations. The 1977 edition of Ford's Shop Manual for dealerships recommended that brakes not be cleaned with an air hose and that a vacuum cleaner be used for this purpose.

a) When these instructions were given.

ANSWER: Seo 14.

b) By whom these instructions were given.

ANSWER: See 14.

c) Were the instructions oral or written.

ANSWER: Written.

d) The precise content of the instructions.

ANSWER: The documents referred to in 14 will be produced upon a proper request.

e) If the instructions were printed, please attach a copy.

ANSWER: See 14 (d).

15. Did the Defendant sponsor since 1930 for its employees or distributors any meetings, seminars, conferences, or conventions where the subject of occupational health and exposure to asbestos was discussed.

ANSWER: See 18. In addition, at Ford's invitation, Dr. Selikoff spoke with certain Ford employees in Dearborn, Michigan in the early 1970's.

16. If the answer to Interrogatory 15 is in the affirmative, state:

a) The date and place of such meeting, seminar, conference, or convention where the subject of occupational health and exposure to asbestos was discussed.

ANSWER: See 18.

b) The name and address of the speaker or discussant.

ANSWER: See 18.

17. Please identify all booklets, manuals, journals and all publications directed from you to customers and users of all asbestos containing products and the dates said information was forwarded regarding the proper use of your asbestos containing products.

ANSWER: See 1, 2 and 14.

18. Please describe and identify all tests and experiments conducted by you to determine whether or not asbestos fibers contained within your asbestos containing products would become air-borne upon their application or use by mechanics such as Plaintiff's decedent. Please state the dates of all tests and experiments and the results and conclusions of each test and/or experiment.

ANSWER: Ford objects to this Interrogatory on the grounds that it is overly broad, vague and impossible to answer fully in that it seeks information concerning all tests, all experiments and all results and conclusions of each such test and experiment.

Subject to the foregoing objection, Ford employees reviewed studies and articles from other sources. In the late 1960's, Ford had air sampling tests conducted to ascertain whether the then threshold limit value was being exceeded in brake lining operations. The limit was not being exceeded.

After a visit by Dr. Irving J. Selikoff, Ford conducted tests that sought to analyze asbestos emissions from brake linings. The findings were that less than .02% of the total brake lining wear generated during the braking process and released into the atmosphere was asbestos fibers. After comparing findings, with those who conducted similar tests, it was concluded that brake

linings posed no pollution hazard to the environment.

In 1973, Ford conducted a survey of asbestos-containing materials and exposures of Ford employees. These samplings showed that the OSHA time-weighted threshold limit value was not exceeded.

Ford acted as a consultant to a study undertaken by the Environmental Protection Agency and Bendix, which resulted in a published article in 1973. This study's findings were consistent with the findings from the previous Ford study.

In the 1970's, Ford participated in and provided partial funding for studies done by Dr. Irving Selikoff and others at the Mount Sinai School of Medicine in New York which included the publication of several papers, the first of which was Asbestos Exposure During Brake Lining Maintenance and Repair, appearing in "Environmental Research", Vol. 12, pages 110-128 (1976). The work done by Dr. Selikoff originally was a study of environmental pollution caused by the asbestos in brake linings. The study later focused on the occupation exposure of mechanics during brake repair and maintenance. Ford became advised of the studies undertaken by Mount Sinai.

19. State your knowledge as to the manner in which your asbestos containing brake lining products were removed or used by mechanics since 1940 and also state your knowledge as to the manner in which said mechanics using your brake lining products were exposed to or created dust in the form of asbestos air-borne fibers.

ANSWER: Ford could not possibly know all the uses or methods of removal "used by mechanics since 1940." Mechanics could possibly be exposed to asbestos fibers during the process of cleaning brake linings.

20. Please state whether or not you ever obtained any knowledge concerning the likelihood of asbestos inhalation being hazardous to health, and if so, state when the corporation first became aware of the hazardous potential of asbestos and its products. State how the Defendant first obtained this knowledge and became so aware of said hazards and from what source this information was obtained.

ANSWER: Ford cannot state when a Ford employee first had knowledge of such information. See 18.

21. Please state the date when you first notified mechanics engaged in the application or removal of asbestos containing brake linings as to the need to wear respirators.

ANSWER: See 19.

22. State whether Defendant has ever published and/or distributed and brochures, sales literature, pamphlets, bulletins, or other written materials (aside from any caution labels on containers) of any kind or character that contained any warnings, cautions, caveats or directions concerning the possibility of injury resulting from the use of the products listed in Interrogatory No.4 above, and if so, please state:

ANSWER: Yes.

a) The wording of each such warning or bulletin.

ANSWER: See 4 and 19.

b) A description of each such printed material.

ANSWER: See 4, 14 and 19.

c) The method used to distribute the warning to persons who are likely to use the products.

ANSWER: See 4, 14 and 19.

d) The date each such warning was issued.

ANSWER: See 4, 14 and 19.

e) The name, address and job classification of each person or persons who have possession of the above described documents.

ANSWER: Unknown.

f) Attach copies of such warnings or bulletins.

ANSWER: See 4, 14, 18 and 19.

g) The name of the author of said warnings or bulletin in the employ of the Defendant. The inquiry concerning this Interrogatory includes any warnings or bulletins that Defendant has ever published or directed to its own employees.

ANSWER: No one person wrote the material.

23. State the names of any expert witness that you intend to rely upon at the trial of this action, and identify the subject matter upon which each said experts will testify, his opinions and the grounds upon which the opinions are based.

ANSWER: Unknown.

24. If written documentation in the form of "scientific data" will be introduced into evidence upon a trial of this case by the Defendant, describe each such document, and include its title, author, and the date and the identity of any publication in which such data was published.

ANSWER: Ford objects to this Interrogatory. It seeks information beyond the scope of discovery set forth in Rule 26.

25. State the full name, present full address, telephone number of all witnesses who will testify on behalf of the Defendant upon a trial of this cause, and identify the subject matter upon which each such witness will testify.

ANSWER: See 24.

26. Describe all written documentation which will be offered upon a trial of this cause on behalf of the Defendant against Plaintiffs.

ANSWER: See 24.

27. Please state if the Defendant intends to assert that it does not manufacture, sell, distribute, or supply asbestos materials to the Midwest area, including Missouri and Illinois.

ANSWER: See 1. Ford products are manufactured, sold and distributed in Missouri and Illinois.

28. State all distributors and companies to which the Defendant sold or distributed asbestos or asbestos materials in Missouri and Illinois for the years 1960 through 1980.

ANSWER: Ford objects to this Interrogatory. It is overly broad, oppressive and burdensome.

29. Do you do business in the area designated by the U. S. District Court as the Eastern District of Missouri, Eastern Division?

ANSWER: Yes.

STATE OF MICHIGAN)
) S.S.
COUNTY OF WAYNE)

ROBERT D. SANBORN being duly sworn, deposes and says that he is an authorized agent of Ford Motor Company and that he verifies the foregoing Answers To Interrogatories 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 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.

Robert D. Sanborn

Subscribed and sworn to before me
this 7th day of November 1983.

Beverly Brown

Notary Public, Wayne County, Michigan
My Commission Expires December 17, 1983

SHEPHERD, SANDBERG & PHOENIX, P.C.

BY _____

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Ford Motor Company

PASSENGER CARS

DISC BRAKE ASSEMBLY

(Front and Rear)

Year	Brake Assembly Supplier	Brake Lining Supplier
1961 - 1982	Bendix Corporation	Bendix Friction Materials Division
	Kelsey-Hayes	Thiokol Chemical (1967-1982)
	Wagner Electric (1961-1968)	Raybestos Manhattan (1961-1974)
	Budd Company (1967-1974/small quantity)	Johns-Manville (1961-1974)
	Teves & Culpeper (1978-1982)	Thermoid Division, H.K. Porter (1961-1968; 1974-1977)
		Delco-Moraine Division of G.M. (1967-1974)
		Borg Warner (1975)
		Universal Manufacturing Company (1961-1968/minor supplier)

PASSENGER CARS and LIGHT TRUCKS

DRUM BRAKE ASSEMBLEY

(Front and Rear)

Year	Brake Assembly Supplier	Brake Lining Supplier
1960 - 1982	Bendix Corporation	Bendix Friction Materials Division
	Kelsey-Hayes	Raybestos Manhattan (1960-1971)
	Wagner Electric (1960-1981/cars only)	Thermoid Division, H.K. Porter (1960-1971)
	Budd Company (1960-1974/5)	Johns-Manville (1960-1971/some involvement)
	Raybestos Manhattan (1970-1982/cars only)	Abex Corporation (1982/semi-metallic linings)
	Varga (Brazil) (1980-1982)	
	Eaton Corporation (1980/cars only)	

LIGHT TRUCKS

DISC BRAKE ASSEMBLY

Year	Brake Assembly Supplier	Brake Lining Supplier
1970 - 1982	Bendix Corporation	Bendix Friction Materials Division
	Dayton Walther	Raybestos Manhattan (1970-1978)
	Kelsey-Hayes (1970-1978)	Royal (1980-1982/some; Canadian company)
	Thiokol Chemical (1970-1973/possible supplier)	

MEDIUM/HEAVY TRUCKS

Year	Brake Assembly Supplier	Brake Lining Supplier
1970 - 1982	Air Brakes - Front and Rear	Air Brakes - Front and Rear
	Rockwell International	Raybestos (1973-1982)
	Eaton Corporation	Bendix Friction Materials Division (1976-1982)
	Wagner Electric (1976-1982/front)	Abex Corporation (1976-1982)
	Bendix Corporation (1972-1976)	Carlisle (1976-1982)
1970 - 1982	Hydraulic Brakes - Front and Rear	Hydraulic Brakes - Front and Rear
	Wagner Electric	Bendix Friction Materials Division (1973-1982)
	Bendix (1970-1976)	Thiokol Chemical (1973-1976)
	Kelsey-Hayes (1970-1973; 1976-1982)	Abex Corporation (1976-1982)
		Carlisle (1976-1982)
		Raybestos Manhattan (1976-1982)

MEDIUM/HEAVY TRUCKS (cont'd)

Year	Brake Assembly Supplier	Brake Lining Supplier
	Disc - Front	Disc - Front
1973 - 1976	Kelsey-Hayes	Johns-Manville (some involvement)
	Drum	Drum
1972 - 1980	Wagner Electric	Bendix Friction Materials Division (1972-1979)
	Kelsey-Hayes (1972-1979)	Thiokol Chemical (1976-1979)
	Bendix (1972-1979)	
	Rockwell International (1972-1976; 1980)	
	"Wedge" Brake - Front and Rear	"Wedge" Brake - Front and Rear
1970 - 1973/ 1976 - 1982	Bendix	Bendix Friction Materials Division (1976-1982)
		Abex Corporation (1976-1982)
		Carlisle (1976-1982)
		Raybestos Manhattan (1976-1982)

MEDIUM/HEAVY TRUCKS (cont'd)

Year	Brake Assembly Supplier	Brake Lining Supplier
	Air-Over Hydraulic Brake - Heavy Truck/Front	Air-Over Hydraulic Brake - Heavy Truck/Front
1976 - 1982	Kelsey-Hayes	Bendix Friction Materials Division
		Abex Corporation
		Carlisle
		Raybestos Manhattan

SPECIAL ORDER VEHICLES

CARS

*Majority of brake assemblies used are regular production brakes for new cars (suppliers already identified).

Year	Brake Assembly Supplier	Brake Lining Supplier
	Police Fleets	Police Fleets
1962 - 1982	Dana Corporation (specialty axles with Bendix brakes) Bendix Corporation (1979-1982)	Bendix Friction Materials Division (1969-1972; 1979-1982) Raybestos-Manhattan (1969-1972) Borg-Warner (1969-1972)

SPECIAL ORDER VEHICLES

CARS

*Majority of brake assemblies used are regular production brakes for new cars (suppliers already identified).

Year	Brake Assembly Supplier	Brake Lining Supplier
	Police Fleets	Police Fleets
1962 - 1982	Dana Corporation (specialty axles with Bendix brakes) Bendix Corporation (1979-1982)	Bendix Friction Materials Division (1969-1972; 1979-1982) Raybestos-Manhattan (1969-1972) Borg-Warner (1969-1972)

SPECIAL ORDER VEHICLES

TRUCKS

Years	Brake Assembly Supplier	Brake Lining Supplier
	Military Trucks	
1962 - 1971	Wagner Electric	
	Kentucky Truck Plant	**Kentucky Truck Plant**
1962 - 1982	Rockwell International	Abex Corporation
	Eaton Corporation	
	Wagner Electric (front end only)	

SPECIAL ORDER VEHICLES

TRUCKS

Years	Brake Assembly Supplier	Brake Lining Supplier
	Military Trucks	
1962 - 1971	Wagner Electric	
	Kentucky Truck Plant	**Kentucky Truck Plant**
1962 - 1982	Rockwell International	Abex Corporation
	Eaton Corporation	
	Wagner Electric (front end only)	

HUTT VEHICLES

Year	Brake Assembly Supplier	Brake Lining Supplier
1959 - 1972	Unknown	Unknown
1972 - Unknown	Wagner Electric Co.	World Bestos Company Drake Lining Co. of America P. T. Drake Lining Co., Inc. Friction Materials Division, Bendix Corp.

JEEPS

Ford Model GP

Year	Brake Assembly Supplier	Brake Lining Supplier
941 to Unknown	Bendix	Unknown
	Kelsey Hayes	

AFTER MARKET PARTS

New (DEALERS)

(Drum and Disc Brakes)

Year	Drake Assembly Supplier	Drake Lining Supplier
1968 to Present	Bendix Corporation	Bendix Friction Materials Division
	Kelsey Hayes	Raybestos Manhattan
	Wagner Electric (not currently)	Abex Corporation

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing was mailed, postage prepaid, this 4th day of Nov, 1983, to:

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