

SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF NEW YORK

NOTICE TO TAKE  
DEPOSITION UPON  
ORAL EXAMINATION

IN RE: NEW YORK CITY ASBESTOS LITIGATION

ALL WEITZ & LUXENBERG CASES V. FORD MOTOR CORP.,

Index No: 40,000/88

PLEASE TAKE NOTICE, that pursuant to the New York Asbestos Litigation Case Management Order and Article 31 of the Civil Practice Law and Rules, that plaintiff, by their attorneys, WEITZ & LUXENBERG, P.C., will take the deposition of the following fact witness individual:

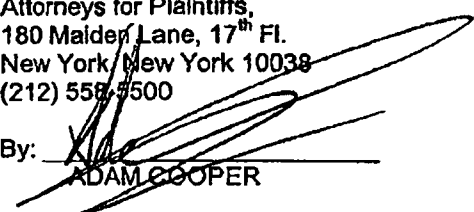
**AL ROCKER, current and/or former Ford Field Operations Manager, Technical Service Operations, Ford Customer Service Division, Ford Motor Co.**

The deposition(s) will commence on the 24<sup>TH</sup> day of July 2006 at 1:00 p.m. and continuing day-to-day until completion, at the offices of WEITZ & LUXENBERG, P.C., located at 180 Maiden Lane, 17<sup>th</sup> Floor, New York, New York. At such date and time, WEITZ & LUXENBERG, P.C. will conduct an examination and the testimony will be recorded stenographically and by videotape.

PLEASE TAKE FURTHER NOTICE, that the persons to be examined are required to bring with them those documents referenced in "EXHIBIT A". These depositions will be held before an officer duly authorized to administer oaths at which time and place you are invited to attend and cross-examine.

Dated: New York, New York  
June 26, 2006

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