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8 Attorneys for Defendant
9 FORD MOTOR COMPANY
10

11 SUPERIOR COURT OF THE STATE OF CALIFORNIA
12 IN AND FOR THE COUNTY OF SAN FRANCISCO
13

14 IN RE COMPLEX ASBESTOS
15 LITIGATION,

No 828684

16 AMENDED SUPPLEMENTAL
17 RESPONSES OF FORD MOTOR
18 COMPANY TO GENERAL ORDER
19 129 STANDARD
20 INTERROGATORIES TO FRICTION
21 DEFENDANTS

22 PROPOUNDING PARTIES.

PLAINTIFFS

23 RESPONDING PARTY:

FORD MOTOR COMPANY

24 SET NUMBER:

GENERAL ORDER NUMBER 129 STANDARD
INTERROGATORIES TO FRICTION DEFENDANTS

25 COMES NOW Defendant FORD MOTOR COMPANY, hereinafter ("Ford") and
26 hereby submits these Amended Supplemental Responses of Ford to General Order 129
27 Standard Interrogatories To Friction Defendants

INTERROGATORIES

INTERROGATORY NO. 1

IDENTIFY the individual verifying these answers on YOUR behalf.

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///

28 HARDIN, COOK, LOPER,
ENGEL & BERGEZ, LLP
1999 Harrison Street
Eighteenth Floor
Oakland, CA 94612 3541
FAX (510) 839-7940
(510) 444-3131

1 **RESPONSE:**

2 Without waiving the objections stated below, Ford states that the responses to these
3 interrogatories constitute a corporate response which has been verified by an authorized agent
4 of Ford. The person signing these responses is an employee of Ford who is an authorized
5 agent for the purpose of verifying discovery responses. That person works at Three Parklane
6 Boulevard, Dearborn, Michigan 48126. For that person's name, please refer to the
7 verification page. Ford requests that any contact be made through Ford's counsel.

8 To the extent this interrogatory seeks an additional or different response, Ford objects
9 on the grounds that it seeks information protected by the attorney-client privilege or attorney-
10 work product doctrine.

11 **INTERROGATORY NO. 2**

12 State the date of first employment with YOU and the dates and titles of each job
13 position the person who verified these interrogatories has held while employed by YOU.

14 **RESPONSE:**

15 Without waiving the objections stated below, Ford states that the responses to these
16 interrogatories constitute a corporate response which has been verified by an authorized agent
17 of Ford. The person signing these responses is an employee of Ford who is an authorized
18 agent for the purpose of verifying discovery responses. That person works at Three Parklane
19 Boulevard, Dearborn, Michigan 48126. For that person's name, please refer to the
20 verification page. Ford requests that any contact be made through Ford's counsel.

21 To the extent this interrogatory seeks an additional or different response, Ford objects
22 on the grounds that it seeks information protected by the attorney-client privilege or attorney-
23 work product doctrine.

24 **INTERROGATORY NO. 3**

25 State whether or not YOU are a corporation and, if so, state:

- 26 A. YOUR correct corporate name;
27 B. YOUR state of incorporation;
28 C. The date of YOUR incorporation;

- 1 D. The address of YOUR principal place of business;
- 2 E. Whether or not YOU have ever held a certificate of authority to do business in
- 3 the State of California and, if so, the inclusive dates of any certificate;
- 4 F. If YOU are wholly owned or the majority interest of YOUR COMPANY is
- 5 owned by another business entity, state the entity's name and principal place of business;
- 6 G. Whether YOU have any business offices in California and, if so, YOUR
- 7 principal place of business in California.

8 **RESPONSE:**

- 9 Yes.
- 10 (a) Ford Motor Company.
- 11 (b) Ford is a Delaware corporation.
- 12 (c) Ford was incorporated in the State of Delaware on July 9, 1919.
- 13 (d) Ford's principal place of business is One The American Road, Dearborn,
- 14 Michigan 48126.
- 15 (e) Ford was qualified to conduct business in the State of California on April 16,
- 16 1920.
- 17 (f) Not applicable.
- 18 (g) Ford has business offices in the State of California. However, Ford's principal
- 19 place of business in One The American Road, Dearborn, Michigan 48126.

20 **INTERROGATORY NO. 4:**

- 21 Have YOU ever been identified, known or done business under any other name in the
- 22 State of California?

23 **RESPONSE:**

- 24 No.

25 **INTERROGATORY NO. 5**

- 26 If YOUR answer to Interrogatory No. 4 is in the affirmative, please state such name
- 27 or names and the time period during which THIS DEFENDANT was so known or identified.

28 **RESPONSE:**

1 Not applicable.

2 INTERROGATORY NO. 6

3 If YOU are not a corporation, what is YOUR business structure (partnership, joint
4 venture, sole proprietorship, etc.).

5 RESPONSE:

6 Not applicable.

7 INTERROGATORY NO. 7

8 If YOU are not a corporation, please IDENTIFY all persons or other entities with an
9 ownership interest in YOU.

10 RESPONSE:

11 Not applicable.

12 INTERROGATORY NO. 8

13 If YOU are not a corporation, please state the following:

14 A. The address where the HISTORICAL RECORDS of THIS DEFENDANT are
15 currently located; and

16 B. The name, job title and current address of the custodian for THIS
17 DEFENDANT'S HISTORICAL RECORDS.

18 As used herein, "HISTORICAL RECORDS" shall include all DOCUMENTS relating
19 to the formation of THIS DEFENDANT, all minutes of partners', general partners' or other
20 owners' meetings and all DOCUMENTS relating to THIS DEFENDANT'S merger with,
21 acquisition of or purchase or sale of or by any other COMPANY.

22 RESPONSE:

23 Not applicable.

24 INTERROGATORY NO. 9

25 IDENTIFY YOUR custodian of Business Records.

26 RESPONSE:

27 Ford objects to this interrogatory on the grounds that it seeks information in violation
28 of attorney-client and attorney work product privileges.

1 INTERROGATORY NO. 10

2 IDENTIFY the person or persons most knowledgeable about:

3 A. YOUR acquisition of RAW ASBESTOS and/or ASBESTOS-CONTAINING
4 FRICTION PRODUCTS;

5 B. YOUR use of RAW ASBESTOS and/or ASBESTOS-CONTAINING
6 FRICTION PRODUCTS;

7 C. YOUR contracting with others to do work involving use or handling of RAW
8 ASBESTOS or ASBESTOS-CONTAINING FRICTION PRODUCTS.

9 RESPONSE:

10 Without waiving any of the objections stated below, Ford states that it has not mined,
11 processed or manufactured asbestos-containing friction products. Ford sold replacement
12 parts which included asbestos-containing brake linings, pads and clutch facings under names
13 such as Ford, Mercury, Ford Authorized Remanufacturers, and under various lines and
14 series names such as Motorcraft. No one person was responsible for "creating, directing, or
15 setting the policy" at Ford with regard to asbestos-containing friction products. However,
16 Mr. Frederick King, a Ford Design Analysis engineer, is generally knowledgeable regarding
17 asbestos-containing friction products.

18 To the extent that this interrogatory seeks an additional or different response, Ford
19 objects on the grounds that it calls for information protected by the attorney-client, attorney
20 work product and/or trade secret privileges.

21 INTERROGATORY NO. 11

22 For DEFENDANTS involved in the MARKETING of ASBESTOS-CONTAINING
23 FRICTION PRODUCTS, state the IDENTITY of physicians, medical directors and/or
24 industrial hygienists employed by THIS DEFENDANT. All other DEFENDANTS need
25 only respond as to medical directors and/or industrial hygienists or physicians employed in
26 the area of employee health and safety. PREMISES owners and domestic corporations need
27 only respond as to the United States only.

28 RESPONSE:

1 Without waiving the objections below, Ford states that it has employed medical
2 directors as part of the Staff to monitor the health and safety of the employees They are
3 located in Dearborn, Michigan They have been

4 Harley Krieger, M D ? to 1954, now deceased;

5 E A Irvin, M D. 1954 to 1970, now deceased;

6 Duane L Block, M D 1970 to 1987, and

7 John Triebwasser, M D. 1987 to present.

8 Ford further states that Industrial Hygiene, a function of Ford's Employee Relations
9 Staff, has employed approximately forty industrial hygienists in the past forty-five years In
10 general, all forty individuals were classified as industrial hygienists with responsibility to
11 perform industrial hygiene field studies only at Ford locations The names of the forty
12 individuals are presented below in two groups - those presently employed and
13 those who have left Ford Credentials and dates of employment will be listed where known

14 Present Industrial Hygienists

15 D S Carruthers, B.S., M S.

16 Occ & Env Health, CIH

17

18 L. Lattore, B.S , M.S

19 Industrial Hygiene, CIH, CSP, 1976

20

21 H. B. Lick, B.A , M.B.A., M.S.

22 Occ & Env Health, CIH, CSP, 1968

23

24 S.S Mungela, B.S., M.S.

25 Occ & Env Health, CIH, CSP, 1977— — — —

26

27 M.D. Kelly, B.S., CIH

28

1	T.F. Strow, B.S., M.S., CIH	
2		
3	P.A. Brogan, M.S.	
4	Occ & Health, CIH	
5		
6	D. Hands, M.S., CIH	
7		
8	Past Industrial Hygienists	
9		
10	R. Anderson 1960s	L. Parrish 1978-81
11	E. Brown 1960s	W. Preston
12	N. Brush 1972-77	S. Rabinovitz 1970s
13	W. Delhey 1950s	J. Radcliff fmr. Mgr., 1948-72
14	H. Dryer 1978-80	L. Redmond 1950s
15	D. Eschelbach 1950s	E. Ross 1950s
16	A. Frazho 1960s	J. Sattelmeier 1960s
17	L. Jenson 1960s	J. Slosar 1960s
18	A. Karpowich 1978-80	F. Snitz 1960s
19	R. Kersten 1977	J. Sproat 1977
20	W. Kronberger	J. Stanko 1973
21	T. Mooney 1930	R. Stites 1940s
22	M. O'Brien 1977-81	P. Toth, fmr. Mgr. 1960-82
23	D. Padden 1930s	J. Ware 1960s
24	D. Greschaw 1956-80s	R. Wabeke, fmr. Mgr., 1970s-1980s
25	C. Plasters 1960s-80s	
26	K. Swaney 1980s	
27	///	
28	///	

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1 INTERROGATORY NO. 12

2 Has any employee of THIS DEFENDANT testified by deposition or at trial on behalf
3 of THIS DEFENDANT in a third-party case, in which THIS DEFENDANT was a party,
4 wherein the plaintiff has alleged an asbestos-related injury? If so, for each such third-
5 party case please state:

- 6 A The caption and case number,
7 B The court filing including state and county,
8 C. The date of deposition or trial testimony,
9 D The name and address of plaintiffs counsel of record,
10 E The name and address of the court reporter

11 RESPONSE:

12 Ford states that it does not maintain a list of individuals who have been deposed in
13 asbestos litigation. Furthermore, Ford's records do not reasonably permit it to identify each
14 and every present or former employee who may have been deposed in connection with
15 asbestos litigation. Ford does state, however, that Mr. Arnold Anderson, P O. Box 2008,
16 Livonia, Michigan, and Mr. Jack Ridenour, Ford Motor Company, c/o Office of the General
17 Counsel, Parklane Towers West, Three Parklane Boulevard, Suite 300, Dearborn, Michigan,
18 have rendered both deposition and trial testimony on behalf of Ford in asbestos related
19 litigation.

20 INTERROGATORY NO. 13

21 For each of the following, please state whether THIS DEFENDANT has ever been a
22 member or paid dues for any representative of THIS DEFENDANT to be a member of the
23 following (please answer to the present):

- 24 A. American Conference of Governmental Industrial Hygienists;
25 B. American Industrial Hygiene Association, -
26 C. American Petroleum Institute;
27 D. American Railroad Association;
28 E. Asbestos Cement Producers Association;

- 1 F. Asbestos Information Association (AIA),
2 G. Asbestos Information Association/North America (AIA/NA),
3 H. Asbestos Textile Institute (ATI),
4 I. Industrial Hygiene Foundation and/or Industrial Health Foundation (IHF),
5 J. Industrial Mineral Insulation Manufacturers Institute;
6 K. Magnesia Insulation Manufacturers' Association,
7 L. Magnesia Silica Insulation Manufacturers Association,
8 M. Mineral Wool Institute;
9 N. National Insulation Manufacturers Association (NIMA);
10 O. National Safety Council,
11 P. New York Academy of Sciences;
12 Q. Quebec Asbestos Mining Association (QAMA),
13 R. Refractories Institute;
14 S. Safe Building Alliance;
15 T. Thermal Insulation Manufacturers Association (TIMA);
16 U. U.S. Maritime Commission;
17 V. IDENTIFY any other organizations, associations or groups of manufacturers,
18 miners, distributors, importers, labelers, suppliers and/or sellers of RAW ASBESTOS and/or
19 ASBESTOS-CONTAINING FRICTION PRODUCTS of which THIS DEFENDANT was a
20 member;
21 W. IDENTIFY any such representative of THIS DEFENDANT.

22 **RESPONSE:**

23 Ford and/or its employees have had memberships in the American Society for Testing
24 and Materials, Society of Automotive Engineers and the American Industrial Hygiene
25 Association. Ford also had a membership in the Industrial Health Foundation, formerly
26 known as the Industrial Hygiene Foundation, from January 1947 through December 1974.
27 However, Ford cannot reasonably identify all employees who are or who may have
28 memberships in these organizations.

((

1 Ford presently is a member of the National Association of Manufacturers, 1176 F
2 St , N W , Washington, D C 20006, Michigan Manufacturers Association, Motor Vehicle
3 Manufacturers Association, 300 New Center Building, Detroit, Michigan 48202, and the
4 National Safety Counsel, 444 N Michigan Ave , Chicago, Illinois 60611.

5 It has been reported by representatives of these respective organizations that there is
6 no record of Ford's' membership in these following organizations: Institute of Occupational
7 & Environmental Health, Quebec Asbestos Mining Association, Brake Lining Manufacturers
8 Association, Friction Materials Standards Institute, Grinding Wheel Institute, Asbestos Tile
9 Institute, Asbestos Information Association, Trudeau Foundation, Asbestos Brake Lining
10 Manufacturers Institute.

11 **INTERROGATORY NO. 14**

12 For each organization, association or other entity identified in YOUR response to
13 Interrogatory No. 13, please state:

14 A. The dates during which THIS DEFENDANT was a member;

15 B. The name(s) of any publication(s) received by THIS DEFENDANT from such
16 association or organization;

17 C The name of any committee or subcommittee of which THIS DEFENDANT
18 was a member and the dates of such committee or subcommittee membership.

19 **RESPONSE:**

20 Ford refers to and incorporates herein its response to Interrogatory No. 13.

21 **INTERROGATORY NO. 15**

22 Had THIS DEFENDANT prior to 1973 received any DOCUMENTS containing
23 results or conclusions of any studies and/or tests conducted by Bonsib for Standard Oil of
24 New Jersey relating to asbestos exposure in the workplace or the human health consequences
25 of exposure to asbestos? If so:

26 A. Either attach all DOCUMENTS or disks containing such data, evidencing the
27 information sought in this interrogatory and its subparts to YOUR answers to these
28 interrogatories or describe such DOCUMENTS with sufficient particularity that they may be

1 made the subject of a request for production of documents

2 B State the date upon which THIS DEFENDANT first received such
3 DOCUMENTS,

4 C. State the IDENTITY of the custodian of such DOCUMENTS,

5 D This interrogatory does not apply to DOCUMENTS contained in a library
6 maintained by a DEFENDANT hospital or a DEFENDANT's library providing access to the
7 general public

8 RESPONSE:

9 No

10 INTERROGATORY NO. 16

11 Had THIS DEFENDANT prior to 1973 received a copy or any portion of any studies
12 and/or tests conducted by any insurance company, including but not limited to Metropolitan
13 Life Insurance Company and Aetna Insurance relating to asbestos exposure in the
14 workplace or the human health consequences of exposure to asbestos? If so

15 A Either attach all DOCUMENTS or disks containing such data, evidencing the
16 information sought in this interrogatory and its subparts to YOUR answers to these
17 interrogatories, or describe such DOCUMENTS with sufficient particularity that they
18 may be made the subject of a request for production of documents,

19 B. State the date upon which THIS DEFENDANT first
20 received such DOCUMENTS;

21 C. State the IDENTITY of the custodian of such DOCUMENTS;

22 D. This interrogatory does not apply to DOCUMENTS contained in a library
23 maintained by a DEFENDANT hospital or a DEFENDANT'S library providing access to the
24 general public. _ _ _ _ _

25 RESPONSE:

26 No.

27 / / /

28 INTERROGATORY NO. 17

1 Had THIS DEFENDANT prior to 1973 received any DOCUMENTS containing
2 results or conclusions of any studies and/or tests conducted by any laboratory, including but
3 not limited to the Saranac Laboratory relating to asbestos exposure in the workplace
4 or the human health consequences of exposure to asbestos? If so

5 A Either attach all DOCUMENTS or disks containing such data, evidencing the
6 information sought in this interrogatory and its subparts to YOUR answers to these
7 interrogatories or describe such DOCUMENTS with sufficient particularity that they may be
8 made the subject of a request for production of documents,

9 B --State the date upon which THIS DEFENDANT first received such
10 DOCUMENTS,

11 C. State the IDENTITY of the custodian of such DOCUMENTS;

12 D This interrogatory does not apply to DOCUMENTS contained in a library
13 maintained by a DEFENDANT hospital or a DEFENDANT's library providing access to the
14 general public.

15 RESPONSE:

16 --- No. ---

17 INTERROGATORY NO. 18

18 State whether THIS DEFENDANT has ever maintained a library (or libraries) which
19 contains books, articles, periodicals, journals and/or reference materials that relate to the
20 subjects of asbestos, industrial hygiene, medicine, safety and/or occupational disease If so,
21 state:

22 A. The date each such library was established;

23 B. The location of each such library;

24 C. The IDENTITY of each librarian or other person in charge of such library.

25 RESPONSE: ---

26 Libraries are maintained in Ford's medical, industrial hygiene, toxicology, and health
27 surveillance functional activities in Dearborn, Michigan. Among the items in these libraries

1 there surely are journals, books, and other publications with references to asbestos. There MS
2 no specific depository solely dedicated to the topic of asbestos.

3 The following journals, among others, were subscribed to at some time during the
4 period from 1928 to the present by Ford medical and health activities: Industrial Health
5 Industrial Medicine & Surgery
6 Journal of Occupational Medicine
7 Journal of American Medical Association
8 Archives of Environmental Health
9 British Journal of Industrial Medicine
10 Annals of Occupational Hygiene
11 Journal of American Industrial Hygiene Association

12 The following journals, among others, were subscribed to at some time by industrial
13 hygiene interests:

14 Archives of Environmental Health
15 American Industrial Hygiene Journal
16 Industrial Hygiene and Toxicology
17 British Journal of Industrial Medicine
18 The Annals of Occupational Hygiene

19 Some health information relative to asbestos is maintained at the Industrial Hygiene
20 and Employee Health Department.

21 INTERROGATORY NO. 19

22 With the exception of OSHA compliance, had THIS DEFENDANT prior to 1980
23 exchanged DOCUMENTS or communicated with any individual or other COMPANY
24 expressly regarding the results of tests and/or studies relating to asbestos exposure in the
25 workplace or the human health consequences of exposure to asbestos? If so, state.

26 A. Each individual or COMPANY with whom the information was exchanged or
27 to whom it was communicated;

28 B. The date(s) of any such exchanges or communications;

C. The IDENTITY of the custodian of such DOCUMENTS

RESPONSE:

In the early 1970's Arnold Anderson and Roy Gealer of Ford's Scientific Research Staff conducted tests to determine the quantity of asbestos fibers liberated from brake linings during the braking process. They concluded that over 99 98% of the asbestos fibers in brake linings decomposed during the braking process into other materials. Their results were published in 1973.

In addition, Ford states that commencing in the early 1970's, Ford participated in and provided partial funding for studies done by Dr. Irving Selikoff and others at what is now the Mt. Sinai School of Medicine in New York, which work was reported on in a paper entitled Asbestos Exposure During Brake Lining and Maintenance and Repair, published in "Environmental Research", Vol. 112, pp. 110-128 (1976). The work done was a study of the environmental pollution, if any, caused by asbestos in brake linings. The study came to focus on the occupational exposure of mechanics during brake repair and maintenance. Ford's Research and Engineering Department and Industrial Hygiene Department were advised of the study. The 1976 publication acknowledges the support received from Ford.

In 1973, Ford's Industrial Hygiene Department conducted air sampling tests on brake linings being cleaned by brake mechanics using air hoses. They determined that asbestos levels were well below existing or proposed O.S.H.A. standards. This testing was done by Mr. Anderson and Henry Lick, under the supervision of Paul Toth, the then manager of Industrial Hygiene. Ford notes that there exists today no medical or scientific evidence that establishes risks associated with exposure to Ford's friction products.

INTERROGATORY NO. 20

Has any employee or designee of THIS DEFENDANT testified on behalf of THIS DEFENDANT before the Occupational Safety and Health Administration, the National Institute of Occupational Health and Safety or any committee or subcommittee of the United States Congress relating to asbestos exposure in the workplace or the human health consequences of exposure to asbestos? If so, please state:

- 1 A. The entity before whom such testimony was given,
2 B The date(s) and location(s) of such testimony;
3 C The IDENTITY of the individual(s) who so testified,
4 D. Whether any DOCUMENTS were presented to the entity before which
5 testimony was given;
6 E Whether copies of DOCUMENTS presented were retained by THIS
7 DEFENDANT and, if so, state the IDENTITY of the custodian of such DOCUMENTS

8 RESPONSE:

9 No

10 INTERROGATORY NO. 21

11 Has THIS DEFENDANT conducted or caused to be conducted, tests and/or studies of
12 asbestos dust created during the manufacture, processing and/or assembling for sale of
13 ASBESTOS-CONTAINING FRICTION PRODUCTS? If so, state:

- 14 A. Each manufacturing facility, including location and address, at which any such
15 test and/or study was conducted;
16 B. The date of each such test and/or study;
17 C The individual(s) or entity conducting each such test and/or study,
18 D. Whether THIS DEFENDANT has any DOCUMENTS containing the results
19 and/or conclusions of each such study;
20 E. The IDENTITY of the custodian of such DOCUMENTS.

21 RESPONSE:

22 Ford refers to and incorporates herein its response to Interrogatory No. 19.

23 INTERROGATORY NO. 22

24 Has THIS DEFENDANT conducted or caused to be conducted, any tests and/or
25 studies on ambient asbestos dust levels at any location or job site where
26 ASBESTOS-CONTAINING FRICTION PRODUCTS were installed, utilized or removed? If
27 so, for the first five tests and/or studies, state.

- 1 A. The location, including name and address, at which each such test and/or study
2 was conducted,
3 B The individual(s) or entity conducting each such test and/or study,
4 C The date of each such test and/or study,
5 D Whether THIS DEFENDANT has any DOCUMENTS containing the results
6 and/or conclusions of each such test and/or study;
7 E. The IDENTITY of the custodian of such DOCUMENTS.

8 **RESPONSE:**

9 Ford refers to and incorporates herein its response to Interrogatory No 19

10 **INTERROGATORY NO. 23**

11 Did THIS DEFENDANT have any laboratory or other similar type of facility
12 anywhere in the United States at which it conducted or caused to be conducted, any tests
13 and/or studies of ASBESTOS-CONTAINING FRICTION PRODUCTS or RAW ASBESTOS
14 relating to the health consequences of asbestos or the dust generated by any use
15 of asbestos or ASBESTOS-CONTAINING FRICTION PRODUCTS. If so, state

- 16 A. The location, including name and address, at which each test and/or study was
17 conducted;
18 B The individual(s) or entity conducting each such test and/or study,
19 C. The date of each such test and/or study,
20 D. Whether THIS DEFENDANT has any DOCUMENTS containing the results
21 and/or conclusions of each such test and/or study;
22 E. The IDENTITY of the custodian of such DOCUMENTS.

23 **RESPONSE:**

24 In addition to the Mt. Sinai research identified in Ford's response to Interrogatory
25 No 19, a great many hours were spent by Ford employees assisting, consulting with and
26 supplying the Mt. Sinai researchers with ideas, comments and materials Dr. Selkoff's 1976
27 article discussing the potential health effects of brake linings expressly acknowledges the
28 support and assistance he received from Ford.

1 INTERROGATORY NO. 24

2 Has THIS DEFENDANT made available to its employees a medical examination
3 program to determine the absence or presence of asbestos-related disease? If so, state

4 A Whether chest x-rays or pulmonary function tests were part of such
5 program(s),

6 B Whether participation in any such program was a mandatory condition of
7 employment or was voluntary;

8 C Whether THIS DEFENDANT has DOCUMENTS of such program(s),

9 D The IDENTITY of the custodian of such DOCUMENTS

10 RESPONSE:

11 Ford maintains medical facilities at its plants and facilities to treat ill or injured
12 employees for all medical complaints or refers them elsewhere for appropriate medical care.

13 INTERROGATORY NO. 25

14 Prior to 1973, did any person file a Workers' Compensation claim for asbestos-related
15 injury against THIS DEFENDANT or any Workers' Compensation carrier for THIS
16 DEFENDANT which provided coverage for THIS DEFENDANT? If so, state the total
17 number of such claims and, for the first 20 such claims, state:

18 A The date of such claim,

19 B The name of the claimant;

20 C. The case number;

21 D. The court in which the claim was filed,

22 E. The IDENTITY of THIS DEFENDANT's custodian of DOCUMENTS
23 evidencing such claims.

24 RESPONSE:

25 Ford's records do not permit retrieval of specific information requested by this
26 interrogatory because alleged injuries are described in general terms such as lungs, chest,
27 back, silicosis, bronchitis, emphysema, pneumoconiosis, cough, pulmonary system, etc ,
28 resulting from exposure to "deleterious substances" or "atmospheric pollutants." It is

1 impossible to ascertain from these records whether or not the alleged injury was associated
2 with asbestos exposure. Furthermore, because of the differences in occupational exposure,
3 the information sought would not be relevant to the claims asserted herein.

4 INTERROGATORY NO. 26

5 Does THIS DEFENDANT have insurance available to cover judgment(s) entered
6 against it in asbestos-related personal injury lawsuits? If so, state

7 A. The name and principal place of business of any insurance carrier who has
8 issued such policy of insurance;

9 B. The number and effective date of each policy;

10 C. The amount(s) of coverage of each policy,

11 D. The applicable dates of coverage

12 RESPONSE:

13 Ford is essentially self-insured for amounts in excess of a reasonable jury award for
14 the damages claimed in this lawsuit. Any judgment rendered against Ford would be satisfied
15 from its assets.

16 INTERROGATORY NO. 27

17 State whether YOU have controlled, purchased or in any way acquired a controlling
18 interest in any corporation or business entity which has mined, manufactured, produced,
19 processed, compounded, sold, supplied, distributed and/or otherwise placed RAW
20 ASBESTOS or ASBESTOS-CONTAINING FRICTION PRODUCTS in the stream of
21 commerce. If so, state:

22 A. The name and address of said corporation or business entity;

23 B. The dates YOU controlled, purchased or acquired any interest;

24 C. The nature of the business as it pertains to asbestos.

25 RESPONSE:

26 No.

27 INTERROGATORY NO. 28

28

1 If THIS DEFENDANT entered into any agreements for the rebranding of any
2 ASBESTOS-CONTAINING FRICTION PRODUCTS by THIS DEFENDANT for resale or
3 distribution by another person or entity, describe each agreement's terms and the parties to
4 said agreement, the duration of the agreement and the name of each product(s) and/or
5 material(s) covered by each such agreement

6 RESPONSE:

7 Assuming that this interrogatory asks whether Ford sells any asbestos-containing
8 friction products to others for resale, Ford responds that it engaged in the sale of
9 asbestos-containing brake and clutch service replacement parts. Ford purchases brake and
10 clutch assemblies from suppliers and markets them as new products under the Ford logo
11 The remanufactured product is produced by "Authorized" remanufacturers who either buy
12 components directly from Ford or use "Ford Quality" components purchased elsewhere.
13 These products are marketed under the name of Ford Authorized Remanufacturers.

14 INTERROGATORY NO. 29

15 If THIS DEFENDANT entered into any agreements for the rebranding of
16 ASBESTOS-CONTAINING FRICTION PRODUCTS manufactured, sold, supplied or
17 distributed by another person or entity for resale or distribution by YOU, describe each of
18 the agreements and the parties to said agreement, the terms, the duration and the names of
19 each product(s) and/or material(s) covered by each such agreement.

20 RESPONSE:

21 Ford refers to and incorporates herein its response to Interrogatory No. 28.

22 INTERROGATORY NO. 30

23 Between the years 1930 and 1985, did YOU purchase or otherwise acquire any
24 ASBESTOS-CONTAINING FRICTION PRODUCT lines from another person or entity? If
25 so, state for each such purchase:

- 26 A. Date of purchase or acquisition;
27 B. Terms of purchase or acquisition agreement;

1 C Either attach all DOCUMENTS or disks containing such data, evidencing said
2 acquisition, or describe such DOCUMENTS with sufficient particularity that they may be
3 made the subject of a request for production of documents;

4 D Trade, brand and/or genetic name of each such product line so acquired,

5 E Name of the person or entity from whom YOU purchased or acquired each
6 such ASBESTOS-CONTAINING FRICTION PRODUCT line;

7 F Location of any manufacturing facilities so acquired and the type of
8 ASBESTOS-CONTAINING FRICTION PRODUCTS manufactured therein

9 RESPONSE:

10 Ford will produce a historical list revised as of May 1, 1995, of some suppliers to
11 Ford of some brake linings and assemblies.

12 INTERROGATORY NO. 31

13 Between the years 1930 to 1985, did YOU sell any ASBESTOS-CONTAINING
14 FRICTION PRODUCT line to another person or entity? If so, state for each such sale:

15 A Date of sale,

16 B Terms of sales agreement;

17 C Either attach all DOCUMENTS or disks containing such data, evidencing said
18 sale, or describe such DOCUMENTS with sufficient particularity that they may be made the
19 subject of a request for production of documents,

20 D Trade, brand and/or genetic name of each such product line sold;

21 E. Name of person or entity to whom YOU sold each such
22 ASBESTOS-CONTAINING FRICTION PRODUCT line; and

23 F. Location of any manufacturing facilities so sold and the type of
24 ASBESTOS-CONTAINING FRICTION PRODUCTS manufactured therein.

25 RESPONSE:

26 Ford sells replacement parts through franchised dealers and authorized distributors
27 throughout the United States. Ford sold these parts, including brake linings, pads and clutch

((

1 facings under names such as Ford, and Mercury and under various lines and series names, as
2 well as names such as Motorcraft Aftermarket parts were sold under the name of Ford or
3 Ford Authorized Remanufacturers. Ford notes that
4 it is not feasible to respond comprehensively to this interrogatory because records containing
5 potentially responsive information may have been discarded in accordance with Ford's
6 record retention policy.

7 INTERROGATORY NO. 32

8 IDENTIFY all brochures, pamphlets, catalogs or other advertising relating to
9 ASBESTOS-CONTAINING FRICTION PRODUCTS and/or RAW ASBESTOS which YOU
10 manufactured, sold, distributed or supplied from the year 1930 to 1985 For each such
11 document, state:

- 12 A. A description of the document; _____
13 B The year it was printed,
14 C. The period of time in which it was used;
15 D. The purpose of said document;
16 E. Whether the documents or copies of said document presently exist;
17 F. If said documents or copies still exist, where they are located;
18 G. The IDENTITY of the custodian of such documents

19 RESPONSE:

20 Ford has not manufactured asbestos-containing friction products for use in its
21 vehicles. Ford purchased these products as pre-assembled parts, which were subsequently
22 installed in its vehicles or sold as replacement parts. Most promotional material
23 concerning such products would pertain to the vehicle as a whole or to pre-assembled
24 replacement parts. Furthermore, Ford is not aware of any sales or promotional literature
25 which describe asbestos-containing friction products.

26 INTERROGATORY NO. 33

27 When do YOU contend THIS DEFENDANT first became aware that there is an
28 association between asbestos exposure and disease in human beings?

1 RESPONSE:

2 Ford states that scattered case reports of carcinoma in persons occupationally exposed
3 to asbestos began appearing in the literature in the 1930s Ford cannot state, however, when
4 a Ford employee first had knowledge of such information. It is known, however, that the
5 initial knowledge of a suggestion of potential hazards associated with asbestos-lined brakes
6 came in a telephone call from Dr. Selikoff to Dr. Roy Gealer of Ford Research and
7 Engineering in April 1975 Ford cannot state when it or any of its employees first had
8 knowledge of asbestos-related disease among Ford employees.

9 INTERROGATORY NO. 34

10 How do YOU contend THIS DEFENDANT first became aware that there is an
11 association between asbestos exposure and disease in human beings?

12 RESPONSE:

13 Ford cannot state when a Ford employee first had knowledge of such information It
14 is known, however, that the initial knowledge of a suggestion of potential hazards associated
15 with asbestos-lined brakes came in a telephone call from Dr. Selikoff to Dr. Roy Gealer of
16 Ford Research and Engineering in April 1975.

17 Ford cannot state when it or one of its employees first had knowledge of
18 asbestos-related disease among its employees Furthermore, because of the difference in
19 occupational exposure, the information sought would not be relevant to the claims
20 asserted herein.

21 INTERROGATORY NO. 35

22 Either attach all DOCUMENTS or disks containing such data, evidencing the
23 information upon which YOUR contentions in Interrogatory Nos. 34 and 35 are based or
24 describe such DOCUMENTS with sufficient particularity that they may be made the subject
25 of a request for production of documents.

26 RESPONSE:

27 Ford refers to and incorporated herein its response and objections to Interrogatory
28 No. 33.

1 INTERROGATORY NO. 36

2 When did YOU first warn YOUR employees that exposure to asbestos could be
3 hazardous to human health? State

- 4 A. Whether the first such warning was written or oral;
5 B. Whether copies of DOCUMENTS containing such warning exist,
6 C. The IDENTITY of the custodian of such DOCUMENTS,
7 D The content of the warning

8 RESPONSE:

9 - Ford did not issue any warning to its employees concerning the hazards of asbestos
10 because it purchased brake and clutch assemblies which were already preassembled and
11 affixed to metal shoes or plates. Since these products were installed as assemblies the
12 employees were not subjected to any exposure

13 INTERROGATORY NO. 37

14 Did YOU ever issue a written COMPANY policy discontinuing warning YOUR
15 employees that exposure to asbestos could be hazardous to human health? If so:

- 16 A. Provide the date;
17 B Describe the circumstances,
18 C Either attach all DOCUMENTS or disks containing such data, evidencing the
19 information sought in this interrogatory and its subparts to YOUR answers to these
20 interrogatories or describe such DOCUMENTS with sufficient particularity that they may be
21 made the subject of a request for production of documents.

22 RESPONSE:

23 Ford did not issue any warning to its employees concerning the hazards of asbestos
24 because it purchased brake and clutch assemblies which were already preassembled and
25 affixed to metal shoes or plates. Since these products were installed as assemblies the
26 employees were not subjected to any exposure.

27 ///

28 ///

1 INTERROGATORY NO. 38

2 At any time between 1930 and 1985, did YOU import, export, ship, transship or
3 otherwise transport RAW ASBESTOS into, out of or through any port in the GEOGRAPHIC
4 AREA? If so, for each occasion:

5 A IDENTIFY and describe the NATURE and amount of RAW ASBESTOS,

6 B. IDENTIFY the ship or ships (including the owners and operators thereof) onto
7 or from which the RAW ASBESTOS was loaded, unloaded or transshipped,

8 C State the dates, port and pier involved for each occasion,

9 D Either attach all DOCUMENTS or disks containing such data, evidencing the
10 information sought in this interrogatory and its subparts to YOUR answers to these
11 interrogatories or describe such DOCUMENTS with sufficient particularity that they may be
12 made the subject of a request for production of documents

13 RESPONSE:

14 No.

15 INTERROGATORY NO. 39

16 Did YOU or any of YOUR predecessors-in-interest manufacture any of the following
17 products which contained ASBESTOS-CONTAINING FRICTION PRODUCTS at any time
18 between 1930 and 1985.

19 A Automobiles,

20 B. Light duty trucks;

21 C. Heavy duty trucks or trailers,

22 D. Buses/coaches;

23 E. Motorcycles;

24 F. Winches, drilling rig or other stationary machinery;

25 G. Aircraft;

26 H Rubber-tired crawler, construction or farm equipment;

27 I. Railed engines or cars including light-railed

28 vehicles;

- 1 J Ships;
2 K Off-road vehicles,
3 L Fork lifts,
4 M Other machinery or equipment (please describe)

5 **RESPONSE:**

6 Ford responds as follows.

7 A Yes.

8 B Yes.

9 C Yes

10 D Ford has been unable to locate records conclusively eliminating the
11 possibility that it manufactured those products during the relevant time.

12 E No.

13 F. No.

14 G No.

15 H Yes.

16 I. No.

17 J No.

18 K Yes.

19 L. No.

20 M. If Plaintiffs define the phrase "other machinery or equipment" Ford will
21 attempt to further respond to this interrogatory.

22 **INTERROGATORY NO. 40**

23 For each product identified in Interrogatory No. 39, state:

24 A. IDENTIFY the ORIGINAL EQUIPMENT including inclusive dates of
25 production;

26 B. For each, IDENTIFY and describe the NATURE of the
27 ASBESTOS-CONTAINING FRICTION PRODUCTS and the inclusive dates thereof;

28

C IDENTIFY the manufacturer and/or distributor of the ASBESTOS-CONTAINING FRICTION PRODUCTS which were included as component parts in YOUR ORIGINAL EQUIPMENT.

D. Either attach all DOCUMENTS or disks containing such data, evidencing the information sought in this interrogatory and its subparts to YOUR answers to these interrogatories or describe such DOCUMENTS with sufficient particularity that they may be made the subject of a request for production of documents (as to ORIGINAL EQUIPMENT vehicle manufacturers, the documents responsive to this subpart are limited to ASBESTOS-CONTAINING FRICTION PRODUCTS).

E IDENTIFY the person(s) presently most knowledgeable about the information sought in this interrogatory or its subparts.

RESPONSE:

Ford responds as follows:

A Ford believes asbestos-containing friction products were incorporated into its vehicles since it began selling mass production vehicles in the early 1900s. Ford further states that the use of asbestos-containing friction products were phased out of the majority of Ford's vehicles by 1984. By 1993, the only vehicles in which asbestos-containing friction products were still used were low-volume limousine applications. Their use in limousines was discontinued in 1997. No one person authorized or directed the "stoppage" of asbestos-containing friction products. Such products were phased out as O.S.H.A. regulations changed and suitable alternatives were discovered.

B. A brake lining is a narrow rectangle, shaped to fit around a circle. A clutch facing is a flat, round, metal plate with two rings, one on each side of friction material. The facing is between the fly-wheel of the engine and the pressure plate of the transmission.

C. Ford will provide Plaintiff with a copy of a list of some historic suppliers of asbestos-containing friction products.

D. Ford, in its on-going searches for information which may be relevant to asbestos litigation, has accumulated approximately 20,000 pages of non-privileged documents

1 and other materials pertaining to asbestos-related issues. To the extent that Plaintiffs'
2 interrogatory may seek information that may be contained in these documents, Ford will
3 make them available for inspection and copying at Plaintiffs' expense at its offices in
4 Dearborn, Michigan, at a mutually agreeable time during regular business hours. Ford
5 objects to this interrogatory to the extent that it calls for information protected from
6 disclosure by the attorney-client privilege or the work product immunity.

7 E Mr. Frederick King, a Ford Design Analysis engineer, is generally
8 knowledgeable regarding asbestos-containing friction products.

9 INTERROGATORY NO. 41

10 Did YOU manufacture or have manufactured or distribute in the United States for a
11 foreign manufacturer ORIGINAL EQUIPMENT? If so, please IDENTIFY each of YOUR
12 authorized dealers during the period 1930-1985 in the DEFINED GEOGRAPHIC AREA

13 RESPONSE:

14 Ford sells replacement parts through franchised dealers and authorized distributors in
15 every state. It is not feasible to respond comprehensively to this
16 interrogatory because records containing potentially responsive information have been
17 discarded in accordance with Ford's record retention policy. The retention period for
18 documents of this nature is less than 7 years.

19 INTERROGATORY NO. 42

20 Did YOU or any of YOUR predecessors-in-interest MARKET brake shoes, brake
21 blocks, brake pads, brake linings or brake bands for any of the uses listed below at any time
22 between 1930 and 1985?

- 23 A. Automobiles or light duty trucks;
- 24 B. Heavy duty trucks or trailers;
- 25 C. Buses or coaches;
- 26 D. Motorcycles;
- 27 E. Winches, drilling rigs or other stationary machinery;
- 28 F. Aircraft;

- 1 G. Rubber tired crawlers, construction or farm equipment;
2 H. Railed engines or cars including light railed vehicles,
3 I. Shipboard,
4 J Off-road vehicles;
5 K Forklifts,
6 L. Other uses.

7 **RESPONSE:**

8 Ford refers to and incorporates herein its response to Interrogatory No. 39

9 **INTERROGATORY NO. 43**

10 For each use identified in Interrogatory No 42, state.

11 A. The trade, brand and generic name by which the product was known from
12 1930 to 1985;

13 B The date(s) YOU:

- 14 1. began MARKETING the product,
15 2. ceased to MARKET the product;
16 3 recalled the product from the market, if ever as a result of
17 asbestos-related health concerns, if any;

18 C. A description of the type and grade of RAW ASBESTOS in the
19 ASBESTOS-CONTAINING FRICTION PRODUCT and the range of asbestos fiber by
20 percentage of weight in each such ASBESTOS-CONTAINING FRICTION PRODUCT for
21 each year between 1930 and 1985, inclusive;

22 D. A general description of the physical appearance and NATURE of each type of
23 ASBESTOS-CONTAINING FRICTION PRODUCT including any generally used method of
24 identification of the product such as distinctive markings and/or logos and the date,
25 inclusive, during which they appeared. In addition to describing the distinctive markings
26 and/or logos, please IDENTIFY the manufacturer or distributor of each type of
27 ASBESTOS-CONTAINING FRICTION PRODUCT;

1 E. IDENTIFY the suppliers of the RAW ASBESTOS used in each type of
2 ASBESTOS-CONTAINING FRICTION PRODUCT and the time period of supply;

3 F The purpose for the inclusion of asbestos in each type of
4 ASBESTOS-CONTAINING FRICTION PRODUCT (e g , binding agent, fire retardant,
5 etc.),

6 G The type of shipping package and the range of shipping package dimensions, if
7 not solid, and the inclusive period of time during which YOU used each such container,
8 package or carton,

9 H A detailed description of any printed material or trademark appearing on each
10 type of container, package or carton identified in G above and the inclusive period of time
11 during which each such combination of printed material and trademark was used,

12 I A detailed description of any written instructions, wrapping or printed insert
13 which was or is placed in the container, package or carton with each such product and the
14 inclusive period of time during which each instruction, wrapping or printed insert was placed
15 in the container, package or carton,

16 J Whether or not YOU have in YOUR possession or under YOUR control
17 samples or exemplars of: 1) each container, package or carton; 2) each printed material or
18 trademark appearing thereon, or 3) each written instruction, wrapping or printed
19 insert mentioned in YOUR response to G, H and I above

20 K. Did YOU place edge codes on the ASBESTOS-CONTAINING FRICTION
21 PRODUCTS YOU MARKETING and, if so, during what period of time?;

22 L. Either attach all DOCUMENTS or disks containing such data, evidencing the
23 information sought in this interrogatory and its subparts to YOUR answer to these
24 interrogatories or describe such DOCUMENTS with sufficient particularity that they may be
25 made the subject of a request for production of documents;

26 M. IDENTIFY the person(s) presently most knowledgeable about the information
27 sought in this interrogatory or its subparts.

28 / / /

1 RESPONSE:

2 Without waiving any of the objections stated below, Ford states as follows

3 A Ford has not mined, processed or manufactured asbestos-containing friction
4 products. Ford sold replacement parts which included asbestos-containing brake linings,
5 pads and clutch facings through franchised Ford dealers and authorized distributors in the
6 United States, under names such as Ford, Mercury, Ford Authorized Remanufacturers, and
7 under various lines and series names such as Motorcraft

8 B Ford believes asbestos-containing friction products were incorporated into its
9 vehicles since it began selling mass production vehicles in the early 1900s. Ford further
10 states that the use of asbestos-containing friction products were phased out of the majority of
11 Ford's vehicles by 1984. By 1993, the only vehicles in which asbestos-containing friction
12 products were still used were low-volume limousine applications. Their use in limousines
13 was discontinued in 1997. No one person authorized or directed the "stoppage" of
14 asbestos-containing friction products. Such products were phased out as O.S.H.A.
15 regulations changed and suitable alternatives were discovered.

16 C. Ford has not manufactured asbestos-containing brake linings, pads or clutch
17 facings. Ford purchased these products from suppliers. Ford understands the type of
18 asbestos fibers in these to be chrysotile. However, since Ford does not manufacture these
19 products, it does not know percentages of asbestos that they contain, but, generally,
20 it is thought to be, for example, between 40% and 60% asbestos, by weight, in brake
21 linings.

22 D. A brake lining is a narrow rectangle, shaped to fit around a circle. A clutch
23 facing is a flat, round, metal plate with two rings, one on each side of friction material. The
24 facing is between the fly-wheel of the engine and the pressure plate of the transmission.

25 E. Ford has not manufactured asbestos-containing brake linings, pads or clutch
26 facings. Ford purchased these products from suppliers. Ford understands the type of
27 asbestos fibers in these to be chrysotile. However, since Ford does not manufacture these
28 products, it does not know percentages of asbestos that they contain, but, generally,

1 it is thought to be, for example, between 40% and 60% asbestos, by weight, in brake
2 linings

3 F Ford used these lining and pads to assist in braking through transmitting
4 rotational force from the engine and fly-wheel to the rear wheels.

5 G Ford vehicles are generally not shipped in packages Aftermarket brake
6 linings, pads and clutch facings are shipped in cartons With respect to the aftermarket brake
7 linings sold by Ford, the Ford logo, as well as a label which reads along the following lines
8 has been placed on cartons since 1980

9 CAUTION CONTAINS ASBESTOS FIBERS AVOID CREATING DUST
10 BREATHING ASBESTOS DUST MAY CAUSE SERIOUS BODILY HARM. WHEN
11 SERVICING THIS BRAKE LINING OR ANY COMPONENT RELATED TO IT OR
12 LOCATED NEAR IT, PREVENT ASBESTOS DUST FROM BEING AIRBORNE BY
13 VACUUMING THIS ASSEMBLY WITH AN INDUSTRIAL TYPE VACUUM CLEANER
14 EQUIPPED WITH A HIGH EFFICIENCY FILTER SYSTEM AND BY WASHING THE
15 ASSEMBLY WITH AN APPROPRIATE BRAKE PARTS WASHER IF NECESSARY.
16 NEVER REMOVE DUST OR DIRT FROM THIS ASSEMBLY BY BLOWING WITH
17 COMPRESSED AIR

18 H Ford refers to and incorporates herein its response to Interrogatory 43G

19 I Ford refers to and incorporates herein its response to Interrogatory 43G

20 J. Ford will produce a sample aftermarket carton used for an asbestos
21 containing friction product.

22 K. Ford states that it did not place edge codes on asbestos products. Ford
23 purchases asbestos-containing friction products from suppliers. The manufacturers of some
24 asbestos-containing friction products can be ascertained by part numbers, formulation codes,
25 and logos on the brake lining.

26 L. Ford will produce all documentation described in this response upon
27 appropriate request.

28 M Mr. Frederick King, a Ford Design Analysis engineer, is generally

1 knowledgeable regarding asbestos-containing friction products

2 INTERROGATORY NO. 44

3 Did YOU or any of YOUR predecessors-in-interest MARKET clutch facings, clutch
4 plates or automatic transmission plates for any of the uses listed below at any time between
5 1930 and 1985?

- 6 A Automobiles or light duty trucks;
- 7 B Heavy duty trucks or trailers,
- 8 C Buses or coaches;
- 9 D Motorcycles,
- 10 E Winches, drilling rigs or other stationary machinery,
- 11 F. Aircraft,
- 12 G Rubber tired crawlers, construction or farm equipment;
- 13 H Railed engine or cars, including light railed vehicles,
- 14 I. Shipboard;
- 15 J Off-road vehicles;
- 16 K. Forklifts;
- 17 L Other uses.

18 RESPONSE:

19 Ford refers to and incorporates herein its response to Interrogatory No. 39.

20 INTERROGATORY NO. 45

21 For each use identified in Interrogatory No. 44, state:

- 22 A. The trade, brand and genetic name by which the product was known from
23 1930 to 1985;
- 24 B. The date(s) YOU:
 - 25 1. began MARKETING the product;
 - 26 2. ceased to MARKET the product;
 - 27 3. recalled the product from the market, if ever, as a result of
28 asbestos-related health concerns, if any;

1 C. A description of the type and grade of RAW ASBESTOS in the
2 ASBESTOS-CONTAINING FRICTION PRODUCT and the range of asbestos fiber by
3 percentage of weight in each such ASBESTOS-CONTAINING FRICTION PRODUCT for
4 each year between 1930 and 1985, inclusive,

5 D A general description of the physical appearance and NATURE of each type of
6 ASBESTOS-CONTAINING FRICTION PRODUCT including any generally used method of
7 identification of the product such as distinctive markings and/or logos and the dates,
8 inclusive, during which they appeared In addition to describing the distinctive markings
9 and/or logos, please IDENTIFY the manufacturer or distributor of each type of
10 ASBESTOS-CONTAINING FRICTION PRODUCT,

11 E IDENTIFY the suppliers of the RAW ASBESTOS used in each type of
12 ASBESTOS-CONTAINING FRICTION PRODUCT and the time period of supply,

13 F The purpose for the inclusion of asbestos in each type of
14 ASBESTOS-CONTAINING FRICTION PRODUCT (e.g , binding agent, fire retardant,
15 etc.);

16 G. The type of shipping package and the range of shipping package dimensions, if
17 not solid, and the inclusive period of time during which YOU used each such container,
18 package or carton;

19 H. A detailed description of any printed material or trademark appearing on each
20 type of container, package or carton identified in G above, and the inclusive period of time
21 during which each such combination of printed material and trademark was used;

22 I. A detailed description of any written instructions, wrapping or printed insert
23 which was or is placed in the container, package or carton with each such product, and the
24 inclusive period of time during which each instruction, wrapping or printed insert was placed
25 in the container, package or carton;

26 J. Whether or not YOU have in YOUR possession or under YOUR control
27 samples or exemplars of. 1) each container, package or carton; 2) each printed material or
28 trademark appearing thereon; or 3) each written instruction, wrapping or printed

1 insert mentioned in YOUR response to G, H and I above,

2 K. Did YOU place edge codes on the ASBESTOS-CONTAINING FRICTION
3 PRODUCTS YOU MARKETING and, if so, during what period of time?

4 L. Either attach all DOCUMENTS or disks containing such data, evidencing the
5 information sought in this interrogatory and its subparts to YOUR answers to these
6 interrogatories or describe such DOCUMENTS with sufficient particularity that they may be
7 made the subject of a request for production of documents,

8 M IDENTIFY the person(s) most knowledgeable about the information sought in
9 this interrogatory or its subparts

10 RESPONSE:

11 Ford refers to and incorporates herein its response to Interrogatory No 43.

12 INTERROGATORY NO. 46

13 Did YOU or any of YOUR predecessors-in-interest MARKET any
14 ASBESTOS-CONTAINING FRICTION PRODUCTS to any ORIGINAL EQUIPMENT
15 MANUFACTURER? If so, IDENTIFY each ORIGINAL EQUIPMENT
16 MANUFACTURER to whom YOU MARKETING ASBESTOS-CONTAINING FRICTION
17 PRODUCTS and as to each ORIGINAL EQUIPMENT MANUFACTURER, IDENTIFY the
18 ASBESTOS-CONTAINING FRICTION PRODUCT that YOU MARKETING to them and the
19 inclusive years that YOU did so.

20 A. Either attach all DOCUMENTS or disks containing such data, evidencing the
21 information sought in this interrogatory and its subparts to YOUR answer to these
22 interrogatories or describe such DOCUMENTS with sufficient particularity that they may be
23 made the subject of a request for production of documents;

24 B. IDENTIFY the person(s) presently most knowledgeable about the information
25 sought in this interrogatory or its subparts.

26 RESPONSE:

27 Ford refers to and incorporates herein its response to Interrogatory No. 43.

28 / / /

1 INTERROGATORY NO. 47

2 Did YOU or any of YOUR predecessors-in-interest MARKET any
3 ASBESTOS-CONTAINING FRICTION PRODUCTS to any PRIVATE BRAND ACCOUNT
4 CUSTOMER? If so, for each PRIVATE BRAND ACCOUNT CUSTOMER, IDENTIFY
5 and describe the NATURE of the product MARKETED to that PRIVATE BRAND
6 ACCOUNT CUSTOMER, the inclusive dates thereof and, if known, the name(s) under
7 which the PRIVATE BRAND ACCOUNT CUSTOMER MARKETED the product

8 A DESCRIBE to the best of YOUR knowledge how the PRIVATE BRAND
9 ACCOUNT CUSTOMER MARKETED the product which YOU sold or distributed to it,

10 B Either attach all DOCUMENTS or disks containing such data, evidencing the
11 information sought in this interrogatory or its subparts to YOUR answers to these
12 interrogatories or describe such DOCUMENTS with sufficient particularity that they may be
13 made the subject of a request for production of documents;

14 C IDENTIFY the person(s) presently most knowledgeable about the information
15 sought in this interrogatory or its subparts.

16 RESPONSE:

17 Ford refers to and incorporates herein its response to Interrogatory No. 43.

18 INTERROGATORY NO. 48

19 Did YOU or any of YOUR predecessors-in-interest MARKET any
20 ASBESTOS-CONTAINING FRICTION PRODUCTS to any AFTER MARKET or
21 REPLACEMENT PART RETAILER operating 10 or more stores in the GEOGRAPHIC
22 AREA? If so, IDENTIFY each AFTER MARKET or REPLACEMENT PART RETAILER
23 in the GEOGRAPHIC AREA and for each please state:

24 A. The inclusive years during which YOU MARKETED products to said AFTER
25 MARKET or REPLACEMENT PART RETAILER;

26 B. IDENTIFY the ASBESTOS-CONTAINING FRICTION PRODUCTS which
27 YOU MARKETED to the AFTER MARKET or REPLACEMENT PART RETAILER;

1 C Either attach all DOCUMENTS or disks containing such data, evidencing the
2 information sought in this interrogatory and its subparts to YOUR answers to these
3 interrogatories or describe such DOCUMENTS with sufficient particularity that they may be
4 made the subject of a request for production of documents,

5 D. IDENTIFY the person(s) presently most knowledgeable about the information
6 sought in this interrogatory or its subparts.

7 RESPONSE:

8 Ford refers to and incorporates herein its response to Interrogatory No. 43

9 INTERROGATORY NO. 49

10 Did YOU or any of YOUR predecessors-in-interest MARKET any
11 ASBESTOS-CONTAINING FRICTION PRODUCTS to any warehouse distributor who
12 MARKETING the product under YOUR name in the GEOGRAPHIC AREA? If so,
13 IDENTIFY each warehouse distributor who MARKETING the product under YOUR name in
14 the GEOGRAPHIC AREA and for each state.

15 A. The inclusive years during which YOU MARKETING
16 ASBESTOS-CONTAINING FRICTION PRODUCTS to said warehouse distributor who
17 distributed the product under YOUR name;

18 B IDENTIFY the ASBESTOS-CONTAINING FRICTION PRODUCTS which
19 YOU MARKETING to the warehouse distributor who distributed the products under YOUR
20 name;

21 C. Either attach all DOCUMENTS or disks containing such data, evidencing the
22 information sought in this interrogatory and its subparts to YOUR answers to these
23 interrogatories or describe such DOCUMENTS with sufficient particularity that they may be
24 made the subject of a request for production of documents;

25 D. IDENTIFY the person(s) presently most knowledgeable about the information
26 sought in this interrogatory or its subparts.

27 RESPONSE:

28 Ford refers to and incorporates herein its response to Interrogatory No. 43

1 INTERROGATORY NO. 50

2 Did YOU or any of YOUR predecessors-in-interest MARKET any
3 ASBESTOS-CONTAINING FRICTION PRODUCTS to any warehouse distributor who
4 MARKETED YOUR ASBESTOS-CONTAINING FRICTION PRODUCTS under a name
5 other than YOURS in the GEOGRAPHIC AREA? If so, IDENTIFY each warehouse
6 distributor who MARKETED YOUR ASBESTOS-CONTAINING FRICTION PRODUCTS
7 under a name other than YOURS in the GEOGRAPHIC AREA and for each please state

8 A The inclusive years during which YOU MARKETED
9 ASBESTOS-CONTAINING FRICTION PRODUCTS through said warehouse distributor,

10 B IDENTIFY the products which YOU MARKETED through the warehouse
11 distributor and for each the name under which the warehouse distributed MARKETED the
12 product,

13 C Either attach all DOCUMENTS or disks containing such data, evidencing the
14 information sought in this interrogatory and its subparts to YOUR answers to these
15 interrogatories or describe such DOCUMENTS with sufficient particularity that they may be
16 made the subject of a request for production of documents;

17 D IDENTIFY the person(s) presently most knowledgeable about the information
18 sought in this interrogatory or its subparts

19 RESPONSE:

20 Ford refers to and incorporates herein its response to Interrogatory No. 43.

21 INTERROGATORY NO. 51

22 Did YOU or any of YOUR predecessors-in-interest MARKET any
23 ASBESTOS-CONTAINING FRICTION PRODUCTS to any retailer operating 10 or more
24 stores in the GEOGRAPHIC AREA who sold ASBESTOS-CONTAINING FRICTION
25 PRODUCTS under YOUR name in the GEOGRAPHIC AREA? If so, IDENTIFY each
26 retailer who sold ASBESTOS-CONTAINING FRICTION PRODUCTS under YOUR name
27 in the GEOGRAPHIC AREA and for each state

1 A. The inclusive years during which YOU MARKETED
2 ASBESTOS-CONTAINING FRICTION PRODUCTS to said retailer who sold the product
3 under YOUR name,

4 B Please identify the ASBESTOS-CONTAINING FRICTION PRODUCTS
5 which YOU MARKETED to the retailer who sold the product under YOUR name,

6 C Either attach all DOCUMENTS or disks containing such data, evidencing the
7 information sought in this interrogatory and its subparts to YOUR answers to these
8 interrogatories or describe such DOCUMENTS with sufficient particularity that they may be
9 made the subject of a request for production of documents;

10 D IDENTIFY the person(s) presently most knowledgeable about the information
11 sought in this interrogatory or its subparts

12 RESPONSE:

13 Ford refers to and incorporates herein its response to Interrogatory No. 43

14 INTERROGATORY NO. 52

15 Did YOU or any of YOUR predecessors-in-interest MARKET any
16 ASBESTOS-CONTAINING FRICTION PRODUCTS to any retailer operating 10 or more
17 stores in the GEOGRAPHIC AREA who MARKETED the product under any other name in
18 the GEOGRAPHIC AREA? If so, IDENTIFY each retailer who MARKETED the product
19 under any other name in the GEOGRAPHIC AREA and for each state:

20 A. The inclusive years during which YOU MARKETED products through said
21 retailer;

22 B. IDENTIFY the products which YOU MARKETED through each retailer and,
23 for each, the name under which the retailer MARKETED the product;

24 C. Either attach all DOCUMENTS or disks containing such data, evidencing the
25 information sought in this interrogatory and its subparts to YOUR answers to these
26 interrogatories or describe such DOCUMENTS with sufficient particularity that they may be
27 made the subject of a request for production of documents;

1 D IDENTIFY the person(s) presently most knowledgeable about the information
2 sought in this interrogatory or its subparts

3 RESPONSE:

4 No

5 INTERROGATORY NO. 53

6 Did YOU or any of YOUR predecessors-in-interest MARKET any
7 ASBESTOS-CONTAINING FRICTION PRODUCTS to any FABRICATOR OF ORIGINAL
8 EQUIPMENT PARTS? If so, IDENTIFY each FABRICATOR OF ORIGINAL
9 EQUIPMENT PARTS to whom YOU MARKETED products and as to each FABRICATOR
10 OF ORIGINAL EQUIPMENT PARTS, state

11 A The inclusive years during which YOU MARKETED said products to each
12 FABRICATOR OF ORIGINAL PARTS;

13 B IDENTIFY each product YOU MARKETED to each FABRICATOR OF
14 ORIGINAL PARTS,

15 C Either attach all DOCUMENTS or disks containing such data, evidencing the
16 information sought in this interrogatory and its subparts to YOUR answers to these
17 interrogatories or describe such DOCUMENTS with sufficient particularity that they may be
18 made the subject of a request for production of documents,

19 D IDENTIFY the person(s) presently most knowledgeable about the information
20 sought in this interrogatory or its subparts.

21 RESPONSE:

22 Ford refers to and incorporates herein its response to Interrogatory No. 43.

23 INTERROGATORY NO. 54

24 Did YOU or any of YOUR predecessors-in-interest MARKET any
25 ASBESTOS-CONTAINING FRICTION PRODUCTS to any agency or department of the
26 U.S. Government? If so, IDENTIFY each agency or department of the U.S. Government to
27 whom YOU MARKETED products and as to each agency or department of the U.S.
28 Government IDENTIFY the product that YOU MARKETED to them and the inclusive

1 years that YOU did so

2 A Either attach all DOCUMENTS or disks containing such data, evidencing the
3 information sought in this interrogatory and its subparts to YOUR answers to these
4 interrogatories or describe such DOCUMENTS with sufficient particularity that they may be
5 made the subject of a request for production of documents;

6 B IDENTIFY the person(s) presently most knowledgeable about the information
7 sought in this interrogatory or its subparts.

8 RESPONSE:

9 Ford states that it sells replacement parts through franchised dealers, authorized
10 distributors and to the U S Military

11 INTERROGATORY NO. 55

12 Did YOU or any of YOUR predecessors-in-interest MARKET any
13 ASBESTOS-CONTAINING FRICTION PRODUCTS to any agency or department of any
14 governmental entity other than the U S Government? If so, IDENTIFY any agency or
15 department of any governmental entity other than the U.S. Government to whom YOU
16 MARKETING products and as to each agency or department of said governmental entity other
17 than the U.S. Government, IDENTIFY the product that YOU MARKETING to them and the
18 inclusive years that YOU did so.

19 A. Either attach all DOCUMENTS or disks containing such data, evidencing the
20 information sought in this interrogatory and its subparts to YOUR answers to these
21 interrogatories or describe such DOCUMENTS with sufficient particularity that they may be
22 made the subject of a request for production of documents;

23 B. IDENTIFY the person(s) presently most knowledgeable about the information
24 sought in this interrogatory or its subparts.

25 RESPONSE:

26 Ford refers to and incorporates herein its response to Interrogatory No. 43.

27 ///

28 ///

1 INTERROGATORY NO. 56

2 Did YOU purchase or acquire any of the RAW ASBESTOS YOU used, processed,
3 manufactured, supplied, distributed, labeled or sold from the General Services Administration
4 or any branch or agency of the U S Government during the period 1930 to 1985? If
5 yes, state:

- 6 A. The name and address of the agency which supplied the RAW ASBESTOS,
7 B The grade and types of RAW ASBESTOS purchased or acquired,
8 C The quantities of each type of RAW ASBESTOS purchased or acquired from
9 1930 to 1985,
10 D. The means of packaging,
11 E Any health warning which accompanied each shipment of asbestos and indicate
12 when the warnings were first made;
13 F Either attach all DOCUMENTS or disks containing such data, evidencing the
14 information sought in this interrogatory and its subparts to YOUR answers to these
15 interrogatories or describe such DOCUMENTS with sufficient particularity that they may be
16 made the subject of a request for production of documents;
17 G. IDENTIFY the person(s) presently most knowledgeable about the information
18 sought in this interrogatory or its subparts

19 RESPONSE:

20 Ford has not manufactured asbestos-containing brake parts used in its production
21 vehicles and, therefore, has not purchased processed asbestos used in their manufacture

22 INTERROGATORY NO. 57

23 As to each ASBESTOS-CONTAINING FRICTION PRODUCT listed in YOUR
24 preceding answers to these interrogatories, did DEFENDANT warn of the health hazards of
25 asbestos? If so, state for each such warning:

- 26 A. The content, size, color and location, whether the warning appeared on the
27 material and/or on the container and/or placed on a tag; whether the warning was included in
28 contracts; whether the warning was included in advertising or other promotional material,

- 1 B State whether YOU have any photographs thereof;
2 C The inclusive dates on which YOU used each such warning,
3 D. State all changes YOU made in such warnings and the dates of such changes,
4 E IDENTIFY the person most knowledgeable about YOUR warnings and
5 warning policy,

- 6 F Do YOU have or know of samples, photographs or DOCUMENTS depicting
7 the above warnings?

8 RESPONSE:

9 Ford refers to and incorporates herein its response to interrogatory No 56.

10 INTERROGATORY NO. 58

11 State whether any surveys or studies of ambient asbestos dust have been conducted by
12 YOU or on YOUR behalf at vehicle repair or maintenance facilities. If yes, state as to each
13 such survey or study:

- 14 A. The subject matter, title and date of each study;
15 B The date and the name of the person authorizing the study,
16 C. The reason for the study;
17 D. IDENTIFY the persons who conducted the study;
18 E The date the study was completed;
19 F Whether the results were published and disseminated and, if so, where and to
20 whom;
21 G. The results of the study;

22 H. If statistical analyses were made, state the date and describe the results and
23 assumptions upon which they were based;

24 I. Either attach all DOCUMENTS or disks containing such data, evidencing the
25 information sought in this interrogatory and its subparts to YOUR answers to these
26 interrogatories or describe such DOCUMENTS with sufficient particularity that they may be
27 made the subject of a request for production of documents;

J. IDENTIFY the person(s) presently most knowledgeable about the information sought in this interrogatory or its subparts

RESPONSE:

In the early 1970's Arnold Anderson and Roy Gealer of Ford's Scientific Research Staff conducted tests to determine the quantity of asbestos fibers liberated from brake linings during the braking process. They concluded that over 99.98% of the asbestos fibers in brake linings decomposed during the braking process into other materials. Their results were published in a 1973 SAE paper by A. Anderson and R. Gealer entitled "Asbestos Emissions From Brake Dynamometer Tests."

In 1973, Ford's Industrial Hygiene Department conducted air sampling tests on brake linings being cleaned by brake mechanics using air hoses. They determined that asbestos levels were well below existing or proposed OSHA standards. This testing was done by Mr. Anderson and Henry Lick, under the supervision of Paul Toth, the then manager of Industrial Hygiene.

In addition, Ford partially financed studies done at Mt. Sinai School of Medicine which reached the same conclusions as the Ford Anderson/Gealer studies.

INTERROGATORY NO. 59

With respect to each product identified in YOUR answers to these interrogatories, describe:

A. The procedure which YOU recommended for installing the ASBESTOS-CONTAINING FRICTION PRODUCT in the vehicle or machine for which it was manufactured;

B. The procedure which YOU recommended for removing the ASBESTOS-CONTAINING FRICTION PRODUCT from the vehicle or machinery for which it was manufactured;

C. Whether the procedure YOU recommended for the use, maintenance or servicing of the ASBESTOS-CONTAINING FRICTION PRODUCT included.

1. Grinding,

- 1 2. Arcing,
2 3 Beveling,
3 4 Sanding

4 D Either attach all DOCUMENTS or disks containing such data, evidencing the
5 information sought in this interrogatory and its subparts to YOUR answers to these
6 interrogatories or describe such DOCUMENTS with sufficient particularity that they may be
7 made the subject of a request for production of documents,

8 E IDENTIFY the person(s) presently most knowledgeable about the information
9 sought in this interrogatory or its subparts

10 RESPONSE:

11 Ford states as follows

12 A - B Ford issued an August 3, 1973, memorandum to Plant Safety Engineers
13 directing that brake drums be cleaned using industrial type vacuum cleaners. The memo
14 directed that air hoses should not be used to clean brake drums. Simultaneously,
15 Maintenance Bulletin 137 was issued by the Plant Engineering Office to the same effect

16 On October 24, 1975, Ford Technical Service Bulletin 99 was distributed to Ford and
17 Lincoln-Mercury Dealers. It recommended that a vacuum cleaner be used for cleaning
18 brakes. In January 1976, a Technical Service Bulletin 104 was issued to the dealers
19 indicating that Ford recommended the use of an industrial vacuum cleaner in brake cleaning
20 operations. The 1977 edition of the Rotunda Catalog and Ford's Shop Manual for
21 Dealerships recommended that brakes not be cleaned with an air hose and that a vacuum
22 cleaner be used for this purpose. In November 1983, Ford issued Bulletin No. 83-22 on
23 brake and clutch servicing. Technical Service Bulletins are presently distributed to
24 approximately 29,000 Ford and Lincoln-Mercury dealer technicians. These documents are
25 the results of corporate activity and are not the work of any single author. These bulletins
26 have not been superseded

1 C At one time, it was the practice to shape and fit linings by cutting, grinding
2 and beveling Also, at one time, it was the practice to affix friction material to the metal
3 shoes or plates by riveting and bonding

4 D Ford, in its on-going searches for information which may be relevant to
5 asbestos litigation, has accumulated approximately 20,000 pages of non-privileged documents
6 and other materials pertaining to asbestos-related issues. To the extent that Plaintiffs'
7 interrogatory may seek information that may be contained in these documents, Ford will
8 make them available for inspection and copying at Plaintiffs' expense at its offices in
9 Dearborn, Michigan, at a mutually agreeable time during regular business hours Ford
10 objects to this interrogatory to the extent that it calls for information protected from
11 disclosure by the attorney-client privilege or the work product immunity.

12 E. Mr. Frederick King, a Ford Design Analysis engineer, is generally
13 knowledgeable regarding asbestos-containing friction products

14 INTERROGATORY NO. 60

15 Did any of the individuals or COMPANIES identified in YOUR answer to
16 Interrogatory Nos. 46-55 inclusive and Interrogatory No. 61 have an exclusive relationship
17 with YOU? If so, IDENTIFY the individual or COMPANY, the production for which the
18 exclusive relationship existed and the inclusive dates of the exclusive
19 relationship.

20 A. Either attach all DOCUMENTS or disks containing such data, evidencing the
21 information sought in this interrogatory and its subparts to YOUR answers to these
22 interrogatories or describe such DOCUMENTS with sufficient particularity that they may be
23 made the subject of a request for production of documents,

24 B. IDENTIFY the person(s) presently most knowledgeable about the information
25 sought in this interrogatory or its subparts.

26 RESPONSE:

27 No.

28 ///

1 INTERROGATORY NO. 61

2 Did YOU at any time between 1930 and 1985 own or operate a wholesale or retail
3 business or store in the DEFINED GEOGRAPHIC AREA at which
4 ASBESTOS-CONTAINING FRICTION PRODUCTS were MARKETING? If so

5 A. State the name, address and years that the BUSINESS or store were in
6 operation,

7 B. IDENTIFY the owner and operator of the store or BUSINESS and the
8 inclusive dates thereof,

9 C IDENTIFY and describe the NATURE of the ASBESTOS-CONTAINING
10 FRICTION PRODUCTS sold at the BUSINESS or store and the inclusive dates thereof,

11 D Did the store of BUSINESS have an exclusive relationship with any
12 manufacturer or MARKETER of ASBESTOS-CONTAINING FRICTION PRODUCTS? If
13 so, IDENTIFY the manufacturer or MARKETER, IDENTIFY the
14 ASBESTOS-CONTAINING FRICTION PRODUCTS and state the inclusive dates of the
15 exclusive relationship,

16 E. Either attach all DOCUMENTS or disks containing such data, evidencing the
17 information sought in this interrogatory and its subparts to YOUR answers to these
18 interrogatories or describe such DOCUMENTS with sufficient particularity that they may be
19 made the subject of a request for production of documents,

20 F. IDENTIFY the person(s) presently most knowledgeable about the information
21 sought in this interrogatory or its subparts.

22 RESPONSE:

23 Ford sells vehicles and replacement parts through franchised dealers and authorized
24 distributors throughout the United States. Ford also refers to and incorporates herein its
25 response to Interrogatory No. 10

26 INTERROGATORY NO. 62

27 If any person YOU have identified in YOUR answers to these interrogatories has had
28 his or her deposition taken, IDENTIFY the deposition by the name of the deponent, the date

1 the deposition was taken, the caption and number of the action in which it was taken, the
2 court which had jurisdiction over the action in which it was taken (including state and
3 county) and either the name and address of the court reporting agency which took the
4 deposition or the name and address of deponent's counsel of record

5 RESPONSE:

6 Ford refers to and incorporates herein its response to Interrogatory No. 12 Ford
7 notes that Mr Fredrick King has been deposed in several cases on behalf of Ford.
8 However, none of these cases alleged asbestos-related injuries

10 CONCLUSION

11 DATED: March 19, 1998

13 Respectfully submitted,

14 HARDIN, COOK, LOPER, ENGEL & BERGEZ, LLP

16 By

Eugene A. Brown, Jr.
EUGENE BROWN, JR.

1 STATE OF MICHIGAN)

2) ss

3 COUNTY OF WAYNE)
4
5
6
7

8 JAMES J. DOTTAVIO

9 , being duly sworn, deposes and says that
10 the deponent is an authorized agent of Ford Motor Company, and that the deponent
11 verifies the foregoing FORD MOTOR COMPANY'S AMENDED SUPPLEMENTAL
12 RESPONSES TO GENERAL ORDER 129 STANDARD INTERROGATORIES TO
13 FRICTION DEFENDANTS for and on behalf of Ford Motor Company and is duly
14 authorized so to do; that the matters stated therein are not within the personal knowledge
15 of the deponent; that the facts stated therein have been assembled by authorized
16 employees and counsel of Ford Motor Company, and the deponent is informed that the
17 facts stated therein are true.
18
19
20
21
22
23



24 Subscribed and sworn to before me this

25 13th day of March 1998

26
27 

28 SANDRA M. LEWIS
29 Notary Public in and for the State of Michigan
My Commission Expires on 3/27/2000

AFFIDAVIT OF SERVICE

STATE OF CALIFORNIA, COUNTY OF ALAMEDA

I, SUSAN ROMO, declare

I am a citizen of the United States, over 18 years of age and not a party to the within action. I am employed in the County of Alameda, my business address is 1999 Harrison Street, Eighteenth Floor, Oakland, California.

On March 19, 1998, I served the within.

AMENDED SUPPLEMENTAL RESPONSES OF FORD MOTOR COMPANY TO
GENERAL ORDER 129 STANDARD INTERROGATORIES TO FRICTION
DEFENDANTS

on all parties in this action, as addressed below, by causing a true copy thereof to be distributed as follows

XX BY MAIL: I am "readily familiar" with the firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with U S postal service on that same day with postage thereon fully prepaid in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing in affidavit.

___ BY HAND DELIVERY: I caused such envelope, to be hand delivered to the stated parties

___ VIA TELEFACSIMILE: I caused such documents to be transmitted via telefacsimile to the stated parties at their respective facsimile numbers

___ VIA EXPRESS CARRIER: I caused such documents to be collected by an agent for ___ to be delivered to the offices of the stated parties.

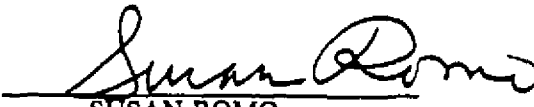
BRAYTON HARLEY CURTIS
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Novato, CA 94948

BERRY & BERRY
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Station D, P.O. Box 70250
Oakland, CA 94612-0250

Harry F. Wartnick, Esq.
WARTNICK, CHABER, et al.
101 California Street, Ste. 2675
San Francisco, CA 94111

I declare under penalty of perjury under the law of the State of California that the foregoing is true and correct.

Executed on March 19, 1998, at Oakland, California.


SUSAN ROMO

(IN RE: COMPLEX ASBESTOS LITIGATION)