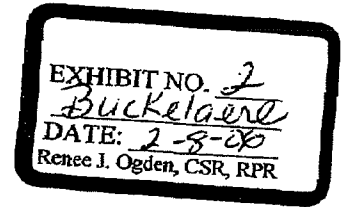


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IN THE CIRCUIT COURT
THIRD JUDICIAL CIRCUIT
MADISON COUNTY, ILLINOIS

IN RE ALL CASES SET BY SIMMONSCOOPER, LLC,)
FOR THE MARCH, 2006, TRIAL DOCKET)
)
)
)
)



NOTICE OF VIDEOTAPED DISCOVERY DEPOSITION OF FORD MOTOR COMPANY'S
S.C.T. RULE 206(a) (1) REPRESENTATIVE DEPONENT

<u>DATE</u>	<u>TIME</u>	<u>DEPONENT</u>	<u>LOCATION</u>
2/8/06	9:30am	Phillip Beuckelaere Ford Motor Company	Wright, Robinson, Osthimer & Tatum 400 Renaissance Ctr., Suite 950 Detroit, Michigan 48243

PLEASE TAKE NOTICE that the videotaped discovery deposition of this deponent will be taken as indicated above; that counsel for Plaintiff will take the videotaped discovery deposition pursuant to Illinois Supreme Court Rule 206, and other applicable rules and statutes; that said deposition will be taken before a Notary Public and Certified Shorthand Reporter, or any other officer authorized by law to take depositions in like cases.

At the specified date and time above, the deponent is requested to produce and bring with him all items listed on the attached Exhibit A.

DATED this 2nd day of February, 2006.

SIMMONSCOOPER, LLC

By

T. N. Gianaris
Ted N. Gianaris, #6237156
707 Berkshire Blvd., P.O. Box 521
E. Alton, IL 62024
(618) 259-2222

cc: Pohlman Reporting (314) 421-0099 phone
(314) 421-1115 fax

EXHIBIT A

All information or documents regarding:

1. The health and safety aspects of Ford Motor Company's asbestos-containing products;
2. Ford Motor Company's efforts and attempts to create, or include for sale on your vehicles or as replacements parts, non-asbestos containing friction materials, including the technical and engineering feasibility of such non-asbestos friction products in the 1960s, 1970s, and 1980s. The safety aspects, both pro and con, of said non-asbestos friction products, and the cost of said non-asbestos friction products.
3. Warnings or cautions provided to customers, mechanics or users of your vehicles or friction materials regarding any potentially harmful health effects o your asbestos-containing products. Why these warnings or cautions were made when they were made and how the decision was made regarding what language to include in said caution or warning.
4. Any and all documents reviewed by the witness in preparation for the deposition.
5. All documents and tangible things that describe, depict, discuss, reference or relate to any decision to use or to discontinue the use of asbestos or asbestos-containing products by defendant.
6. All documents and tangible things that describe, depict, discuss, reference or relate to any of defendant's safety meeting, safety policy or safety programs regarding use of asbestos-containing products.
7. All hazard communication manuals, safety handbooks, procedure manuals, warnings and/or other documents and tangible things used at any time by defendant to communicate the potential health hazards of asbestos or any asbestos-containing product.