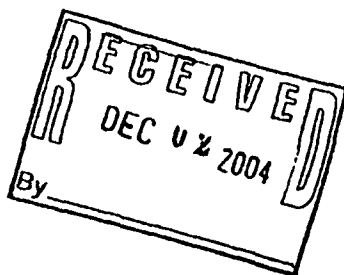


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IN THE CIRCUIT COURT
THIRD JUDICIAL CIRCUIT
MADISON COUNTY, ILLINOIS

IN RE: ALL ASBESTOS LITIGATION)
FILED BY THE SIMMONS FIRM, LLC,)
)
Plaintiffs,)
vs.)
)
A.W. CHESTERTON, et al.,)
)
Defendants.)



**FORD MOTOR COMPANY'S ANSWERS TO
PLAINTIFFS' INTERROGATORIES**

Defendant Ford Motor Company ("Ford") herein submits its Answers to Plaintiffs' Interrogatories to Ford Motor Company as follows.

PRELIMINARY STATEMENT AND GENERAL OBJECTIONS

Ford's answers to plaintiffs' interrogatories have been prepared in accordance with the Illinois Rules of Civil Procedure, pursuant to a reasonable and duly diligent investigation and search for the documents and information requested. Ford has not completed its investigation of the facts relating to this litigation. Consequently, Ford's answers to plaintiffs' interrogatories reflect all of the responsive information identified by Ford pursuant to a reasonable and duly diligent search in those areas where such information is expected to be found in the United States. To the extent these interrogatories purport to require more, Ford objects because (a) they seek to compel Ford to conduct a search beyond the scope of permissible discovery contemplated by the applicable rules of evidence and procedure, and (b) compliance with the interrogatories would impose an undue burden and expense on Ford. The following answers are given without prejudice to Ford's right to produce evidence of any subsequently discovered facts. Ford also