

RESPONSE: After a reasonable and diligent search, Ford was unable to locate any documents relating to the study specifically identified by Plaintiff (*i.e.*, "brake dust biological study"). Ford's investigation of these issues is ongoing, and Ford reserves the right to supplement this answer if additional information is located.

Ford otherwise objects to this request because it is overly broad, unduly burdensome, and seeks information that is neither relevant to the subject matter of this action nor reasonably calculated to lead to the discovery of admissible evidence. Ford also objects to this request to the extent it seeks information that is protected from disclosure by the attorney-client privilege, work product doctrine, consulting expert privilege, joint defense privilege, or any other applicable privilege.

Request No. 7

The "materials to challenge 1986 EPA" referenced in Exponent Invoice No. 95700 (produced in Mallia, Dade County Case No.: 04-16237 CA 42) to YOU.

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