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July 31, 2017

VIA ELECTRONIC MAIL

Rule 30(b)(6) Subcommittee
Advisory Committee on Civil Rules

Re: Comments regarding Rule 30(b)(6) and related matters

Dear Members of the Rule 30(b)(6) Subcommittee:

Federal Rule of Civil Procedure 30(b)(6) is a valuable and time-saving discovery device when used appropriately, but the Rule, and its state court counterparts, are frequently used in an inappropriate fashion to attempt to gain a tactical advantage, without regard to the substantive issues in some cases.

It is important to keep in mind that many states follow the lead of the Federal Rules of Civil Procedure. Any amendments to Rule 30(b)(6) will be closely watched, and hopefully followed. Keeping that in mind, the comments below are based on experiences in federal and state courts.

By way of introduction, for the last 12 years I have served as national asbestos/toxic tort discovery counsel for a defendant in the asbestos litigation; I have been practicing law for 28 years. I hope the Committee finds the following information and suggestions useful in its discussions.

- 1. There should be a presumptive limit on the number of matters for examination, and the Rule should require detailed specificity and proportionality with regard to the matters.**

In serial asbestos litigation, it is commonplace for plaintiffs' counsel to serve deposition notices that contain 30-50 matters for examination. Unfortunately, it is also not a rare occurrence for even more burdensome notices to be served. On the high end, my client has been served with deposition notices with as many as 70 to almost 100 matters and corresponding document requests. One example from a state court had 44

matters for examination with over 210 subparts, and a catchall document request referencing all matters for examination.

Many matters for examination request information, if not for a period of decades, then for the entire history of the company. Other matters, although they may not specify a timeframe, frequently request such a vast amount of information that it would be difficult, if not impossible, for a party to comply.

Examples of such matters include requests for vast amounts of information for decades of specifications regarding the manufacture of vehicles and the entire corporate history of an organization, regardless of whether such information is pertinent to the issues in the case. In another example, a recent deposition notice in federal court contained 54 matters for examination. (Exhibit A) The last matter asked my client to produce a witness to testify with regard to any factual basis for which the defendant was contesting the authenticity of plaintiffs' exhibits, in excess of 900 documents. Considering that the average number of exhibits used at trial in these types of cases is 40 to 50, sometimes reaching as many as 100, the matter was particularly burdensome and not proportional to the needs of the case. In any event, such issues regarding authenticity should be handled by requests for admission of authenticity or stipulations, and not in the context of a deposition.

In order to avoid disputes over the scope of the matters for examination, minimize the need for motions for protective order, and allow a witness to adequately and reasonably prepare for the deposition, the number of matters for examination should be limited, and they should be stated with specificity and be proportional to the needs of the case. Matters and document requests which do not comply with those requirements should be considered presumptively improper.

- 2. The Rule should include a 30-day notice requirement and scheduling orders should be structured so that a 30(b)(6) deposition notice is not served late in the discovery process.**

Many 30(b)(6) notices are served late in the discovery process, some at the very last possible moment. In the instances that notices contain many matters for examination, coupled with relatively short notice, it is extremely difficult for witnesses to be adequately prepared as required by the Rule. It also presses counsel for time to evaluate the notice and potentially prepare and file a motion for protective order, which would necessarily have to be accompanied by supporting affidavits and perhaps other exhibits.

To encourage a smooth and civil discovery process, the parties should be required to discuss the timing of service of 30(b)(6) notices during the Rule 26(f) conference, and a deadline should be set in any scheduling order for the service of the notice.

The burden should not be on the party responding to the deposition notice to quickly file a motion for protective order, after the noticing party can take weeks, if not months, to draft a notice with scores of potentially overly broad and unduly burdensome matters for examination, while the responding party frequently only has a matter of a few to several days to prepare a motion for protective order and supporting affidavits. As discussed below, a mechanism for serving objections to a notice should also be added to the Rule. Even if such objections were to become recognized, a 30-day notice requirement would provide an opportunity for counsel to meet and confer to narrow the issues prior to any motions practice.

3. **Rule 30(b)(6) should be amended to allow for objections to be served to the deposition notice, including individual objections to the matters for examination and document requests, similar to the provisions in Rule 45.**

There is no provision in Rule 30(b)(6) for objecting to matters for examination and document requests, as compared to the procedure in Rule 45. Requiring that the party requesting the deposition have the burden to move the court for a ruling on any objections would require the requesting party to evaluate the matters for examination to which objections are raised, and would bring the parties to a meet and confer process quickly, without the need for an immediate motion for protective order. In situations where there are numerous matters and document requests, it would be a far more efficient process to have objections due in some reasonable time after service of the notice, than for the served party to be required to initiate and conduct a meet and confer process and then prepare and file a motion for protective order, all before the noted date for the deposition.

4. **Depositions should only be taken where subject matters have not been covered in prior depositions and information cannot be adequately provided in written discovery responses or by stipulation.**

In serial litigation, despite the availability of information contained in scores of prior depositions, and that most of the information can be provided in written discovery responses and document productions, overly broad and unduly burdensome deposition notices continue to be served. Indeed, there are firms that frequently affiliate to represent plaintiffs and have in their combined possession in excess of 120 prior deposition transcripts of corporate representatives of my client. Yet, they continue to

serve deposition notices regarding the same subject matters, despite having taken many depositions of the same representatives themselves and possessing transcripts of representatives taken over the course of three decades.

While specific information may be needed for particular cases, it should be sought and produced in the most efficient manner possible, which can frequently take the form of written responses and stipulations, not repetitive depositions. Accordingly, Rule 30(b)(6) depositions should not be permitted, or should be appropriately limited by information already available in prior depositions or which can be provided in written responses or document productions.

5. Rule 30(b)(6) should be amended to clearly state that the witness is not required to respond to questions beyond the scope of the matters in the notice.

There is no clear rule as to whether a 30(b)(6) witness can be forced to answer questions beyond the scope of the enumerated matters in a deposition notice, and the case law is divided on the issue. In theory, if a witness is asked a question beyond the scope of the notice, an answer is in the witness's individual capacity, and not on behalf of the organization.

While I have not conducted exhaustive research on this topic, in my experience, it makes little practical difference whether testimony is not offered in the witness's 30(b)(6) capacity to questions that are beyond the scope of the notice. While defending counsel may object that questions are beyond the scope of the notice, instructing the witness not to answer is not permitted under Rule 30(c)(2), except to "preserve a privilege, to enforce a limitation ordered by the court, or to present a motion under Rule 30(d)(3)." Suspending a deposition to bring a motion under Rule 30(d)(3) is not a practical solution considering the disruption to the deposition process and the frequency of such questions.

An organizational party should not be bound by testimony for which its representative is not required to prepare to testify in response to specific matters for examination. The Rule should be amended to clearly state that the witness is not required to respond to questions beyond the scope of the matters in the notice, that such questions are presumptively improper, and defending counsel has the right to instruct the witness not to answer such questions. There will inevitably be disputes regarding whether questions are beyond the scope of a notice. In such instances, the parties should conclude the deposition to the extent practicable, engage in a meet and confer process, and then bring only the remaining areas of dispute to the court.

6. The Federal Rules of Evidence should be amended to permit the admissibility of affirmative testimony provided by a Rule 30(b)(6) witness.

In the past several years, I have seen a new practice employed by some counsel where they notice a 30(b)(6) deposition, obtain testimony which, of course, the witness is obligated to prepare for and provide, and object to questions by defending counsel on the ground that the witness lacks "personal knowledge."

Much of the factual information concerning the asbestos litigation includes the use of asbestos-containing components in vehicles, knowledge of the hazards of asbestos, warnings and other topics, regarding events which took place and documents dated, for the most part, in the 1960s through the 1990s. Many of the former employees who were primarily involved in the matters at issue are deceased or retired and of advanced age with health concerns.

In one case, the company's representative was called as an adverse witness and examined for three days at trial. At the end of that examination, defense counsel attempted an examination of the witness with regard to the same documents that were used by plaintiffs' counsel. Plaintiffs' counsel objected on the ground that the witness was not employed at the company during the time that most of the documents were dated in the 1970s, and lacked personal knowledge with regard to the matters at issue. The objection was sustained, and defense counsel's examination ended.

In another example, after three days of deposition, much of it about company documents, plaintiffs' counsel objected to most of defense counsel's questions during a relatively brief direct on the ground that the witness lacked personal knowledge. During an argument at a trial of another case regarding the admissibility of the corporate representative's testimony, opposing counsel commented that there is no "corporate storyteller" exception to the Rule Against Hearsay.

Some plaintiffs' counsel take the position that the responses to their questions are admissible because they are an opposing party's statement (Fed. R. Evid. 801 (d)(2)), but the responses to questions by the company's counsel are not admissible in the event the witness lacks "personal knowledge."

Considering the obligation of organizational parties to prepare witnesses who "must testify about information known or reasonably available to the organization[s,]" that the testimony of such witnesses is on behalf of the organizations, and can be used against the organizations, it would be one-sided and inequitable to not permit such

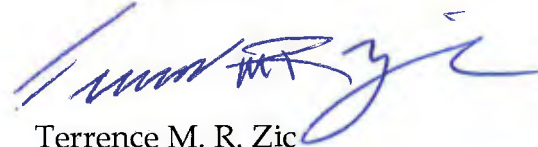
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witnesses to present affirmative testimony -- especially in such circumstances where individuals who were primarily involved in the matters at issue in the case are deceased, retired, no longer with the organization, or otherwise unavailable or unable to testify.

Thank you for your time and consideration of these issues.

Please feel free to contact me.

Very truly yours,

A handwritten signature in blue ink, appearing to read "Terrence M. R. Zic". The signature is stylized and cursive, with a large, sweeping flourish at the end.

Terrence M. R. Zic
Partner

EXHIBIT A

DEFINITIONS

Notwithstanding any definition below, each word, term, or phrase used in these Interrogatories is intended to have the broadest meaning permitted under the Federal Rules of Civil Procedure.

1. *Concerning*: The term “concerning” means relating to, referring to, describing, evidencing, or constituting.

2. *Communication*: The term “communication” means the transmittal of information by any means.

3. *Document*: The terms “document” and “documents” are defined to be synonymous in meaning and equal in scope to the usage of the term “documents” in Fed. R. Civ. P. 34(a) and include(s) the term “writing.” Unless the producing party demonstrates undue burden or other grounds sufficient to meet the requirements of Fed. R. Civ. P. 26(c), electronic mail is included within the definition of the term “document.” The terms “writings,” “recordings,” and “photographs” are defined to be synonymous in meaning and equal in scope to the usage of those terms in Fed. R. Evid. 1001. A draft or non-identical copy is a separate document within the meaning of the term “document.”

4. *Identify (with respect to persons)*: When referring to a person, to “identify” means to state the person’s full name, present or last known address, and, when referring to a natural person, additionally, the present or last known place of employment. If the business and home telephone numbers are known to the answering party, and if the person is not a party or present employee of a party, said telephone numbers shall be provided. Once a person has been identified in accordance with this subparagraph, only the name of the person need be listed in response to subsequent discovery requesting the identification of that person.

5. *Identify (with respect to documents)*: When referring to documents, to “identify” means to state the: (i) type of document; (ii) general subject matter; (iii) date of the document; and, (iv) author(s), addressee(s), and recipient(s) or, alternatively, to produce the document.

6. *Occurrence/Transaction*: The terms “occurrence” and “transaction” mean the events described in the Complaint and other pleadings, as the word “pleadings” is defined in Fed. R. Civ. P. 7(a).

7. *Parties*: The terms “plaintiff ” and “defendant” (including, without limitation, third-party plaintiff, third-party defendant, counter claimant, cross-claimant, counter-defendant, and cross-defendant), as well as a party’s full or abbreviated name or a pronoun referring to a party, mean that party and, where applicable, its officers, directors, and employees. This definition is not intended to impose a discovery obligation on any person who is not a party to the litigation or to limit the Court’s jurisdiction to enter any appropriate order.

8. *Person*: The term “person” is defined as any natural person or any business, legal or governmental entity or association.

9. *You/Your*: The terms “you” or “your” include the person(s) to whom these requests are addressed, and all of that person’s agents, representatives and attorneys.

10. The present tense includes the past and future tenses. The singular includes the plural, and the plural includes the singular. “All” means “any and all;” “any” means “any and all.” “Including” means “including but not limited to.” “And” and “or” encompass both “and” and “or.” Words in the masculine, feminine or neuter form shall include each of the other genders.

11. “Insurer(s)” or “insurance company” mean any entity or individual carrying on an insurance business and/or who underwrites an insurance risk, such as but not limited to any entity or person that **provided you insurance at any time (including in the past)** in any form, including but not limited to primary coverage, excess coverage, commercial coverage, umbrella coverage, re-insurance coverage, general coverage or any other form of coverage.

12. “Vehicle(s)” include the vehicle and all components and materials used in, on or in connection with the vehicle, such as but not limited to braking systems, clutch systems, linings and gaskets.

13. “Asbestos-containing products” includes your vehicles and any asbestos-containing materials/products assembled, delivered, designed, distributed, fabricated, installed, labeled, manipulated, manufactured, milled, mined, modified, purchased, rebranded, sold, supplied and/or used under license or otherwise, by you or used in/on your vehicles, such as but not limited to braking systems, clutch systems, linings and gaskets.

14. “Identify the brake specification(s)” means to state with specificity the specifications for each of your vehicles braking systems, to include whether the friction material on the original equipment front brake pads and/or shoes contained asbestos or was asbestos-free; ii) whether the friction material on the original equipment rear brake pads and/or shoes contained asbestos or was asbestos-free; iii) whether the friction material for the original equipment service replacement front brake pads and/or shoes contained asbestos or was asbestos-free; and iv) whether the friction material for the original equipment service replacement rear brake pads and/or shoes contained asbestos or was asbestos-free.

AREAS OF INQUIRY

The Deponent(s) shall testify about the following matters:

1. The names, addresses, job titles, length of time employed/retained by Defendant, and a year-by-year list of all other positions, titles, or jobs held when working for Defendant of each person who has supplied any information used in answering Plaintiffs’ discovery requests, and the identity of all documents concerning same.

2. For each model year between 1950 and 1979 that Ford branded motor vehicles were sold, the identity, by year, of the brake specification(s) for each of your models by model and trim line, and the identity of all documents concerning same.
3. Whether any of the models and trim lines identified in Area of Inquiry No. 2 that there were asbestos-free brake linings that would safely and effectively stop the vehicle, the identity of the non-asbestos linings (by manufacturer brand name and specific part number and corresponding brake edge code) for each model and trim line you claim could safely and effectively stop the vehicle and, when each such product was commercially/generally available in the United States, and the identity of all documents concerning same.
4. Whether there were suitable asbestos-free brake linings that would safely and effectively stop any of your vehicles between 1950 and 1979, and, if so, state by each model, trim line and year all information concerning any such contention and the identity of all documents concerning same.
5. Your specification of asbestos-containing brakes and clutches for use in Ford vehicles at any time during the years 1950 to 1979, inclusive, and the identity of all documents concerning same.
6. Your involvement in any manner in the design of asbestos-containing brakes and/or clutches for use in Ford vehicles at any time during the years 1950 to 1979, inclusive, and the identity of all documents concerning same.
7. Your communications with any of your supplier of friction products that relates in any way to the content of the friction materials used in the products supplied to you during the years 1950 to 1979, inclusive, and the identity of all documents concerning same.
8. Your choice and/or specification of any particular fiber type such as chrysotile asbestos, amosite asbestos or crocidolite asbestos, in friction products for Ford vehicles from 1950-1979 and the identity of all documents concerning same.
9. Your use of crocidolite-asbestos-containing phenolic reactors in your vehicles prior to 1980 and the identity of all documents concerning same.
10. Performance specifications (and the design thereof) for your vehicles and any friction products used in your vehicles (such as but not limited to braking systems), including your involvement of any kind in such design/specification and the identity of all documents concerning same.
11. All Ford product change requests ("PCR") relating to asbestos or asbestos free brakes, clutches or gaskets, including but not limited to any and all engineering product change requests regarding changes made for any reasons, and the identity of documents concerning same.
12. Efforts and attempts you made to create, or include for sale non-asbestos-containing products, including the technical and engineering feasibility of such non-asbestos products; the

safety aspects, both pro and con, of said non-asbestos products; and the cost of said non-asbestos products, and the identity of all documents concerning same.

13. The profitability of Ford's use of asbestos-containing friction products as opposed to asbestos-free alternatives and the identity of all documents concerning same.

14. Ford's cost-benefit analysis supporting its continued use of asbestos-containing friction products and the identity of all documents concerning same.

15. Whether you requested of any of your suppliers that they not cease their supply of asbestos-containing products to you and identify the substance of the request(s), to whom/what entities you made such requests of and when, and the identity of documents concerning same.

16. Packaging, distribution and product identification of your asbestos-containing products, including the aftermarket distribution of your asbestos-containing products, including but not limited to the appearance of packaging in which Ford supplied replacement friction products, and the identity of documents concerning same.

17. Warnings, cautions or labels regarding asbestos hazards provided with 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, and the identity of documents concerning same.

18. The identity of documents and any other information that demonstrates or otherwise reflects that you actually placed the alleged cautionary statements you claim accompanied and/or were placed in the boxes that contained your friction products as sold to consumers between the years of 1980 and 1995 and the identity of documents concerning same.

19. All Ford Manufacturing Standards related to ZF10 "labeling" and any information concerning same, including but not limited to the identity of documents concerning same.

20. All representations or statements, verbally or in writing, to any individual or entity, including any federal, state, or local governmental agency or entity or any of your past insurers that your vehicles would not operate safely or as designed if asbestos-containing friction materials were replaced with asbestos-free friction materials and the identity of documents concerning same.

21. The identity of the first 40 lawsuits pertaining in any manner to allegations of personal injury caused by exposure to asbestos to which you were a party (including the case caption, the docket/case number, the name of the court in which the case was pending, and the identity of the lawyers that represented you), the specific nature of the allegations in each case, and the date and substance of any findings by the court and/or the amount of any decrees, verdicts or judgments and the identity of documents concerning same.

22. The location and contents of authentic copies of your answers to interrogatories in the lawsuits that are the subject of Area of Inquiry 21 and the identity of documents concerning same.

23. The contents of the multi-page “slide-tape script and (2) brochures regarding asbestos poisoning” identified in the June 1, 1981 Inter Office memo attached hereto as **Exhibit A** and how the slide-tape script and brochures regarding asbestos poisoning came to be and the identity of documents concerning same.

24. The identity, location and contents of the transcript (inclusive of all exhibits) of Mr. Arne Anderson to which **Exhibit A** hereto was marked as Exhibit 5 and the identity of documents concerning same.

25. For each of the four class actions identified in Exhibit A hereto, the identity of following:

- a. The pleadings filed by each party including complaint, answers, motions, and all other pleadings (or the analogs thereof if the proceeding/litigation describes such documents using different terms);
- b. All documents produced by Ford in each proceeding/action;
- c. All documents produced by any Plaintiffs or other parties to the lawsuit in each proceeding/action;
- d. All discovery responses filed or served by any party in the proceeding, including, but not limited to, interrogatories, requests for production of documents and requests for admissions in each proceeding/action;
- e. All stipulations of fact from each proceeding/action;
- f. All affidavits or other sworn statements produced or obtained by Ford or any other party in each proceeding/action; and
- g. All deposition transcripts and trial testimony from each proceeding/action, including all exhibits thereto.

26. The identity of all “Annual Industrial Hygiene Discussionals” (hereinafter referred to as “Discussional(s)”) or conferences wherein the dangers of asbestos were discussed that you were invited to and/or attended, to include identifying who on your behalf attended each such Discussional, the identity of other attendees and the matters/topics discussed/addressed at each such Discussional, your participation and/or membership, the purpose and objective of the Discussional(s), and the documents relating to such Discussional(s) (including but limited to not any invitations to attend, agendas, meeting minutes, “File Memoranda” (such as the one attached hereto as **Exhibit B**) and any other documents relating to such “Discussional(s)” or conferences. Please further be prepared to state whether you possess a complete copy of or any portion thereof of the attached File Memorandum dated November 19, 1970 and, if so, be prepared to identify the length of the document, the contents of the document and where a copy is maintained.

27. When Ford first conducted any epidemiology studies and why, and the identity of all documents concerning same.

28. All Ford documents whether or not disseminated either internally or externally that reference asbestos or safety, including but not limited to warnings, and the identity of all

documents concerning same.

29. Training regarding the actual or potential dangers of asbestos on human health provided by Ford Motor Company to mechanics of Ford Motor Company franchised dealerships between 1950 through the present, and the identity of all documents concerning same.

30. Your knowledge of the hazards of asbestos, and the identity of Ford publications/documents that concern or contain advisories, cautions, disclaimers, directives, hazards, injuries, mandates, precautions, safety statements, training, and/or warnings regarding asbestos exposure.

31. All information concerning hazards of asbestos attendant to work on and/or around vehicles during maintenance, service and/or repair that Ford received and/or became aware of. This includes but is not limited to any information concerning work practices and/or lung abnormalities in automobile mechanics.

32. Your document retention policy, to include detailing your document retention policy generally (and any exceptions thereto) and identify all documents concerning your document retention policy/ies. This area of inquiry includes past and present policies, practices, or procedures regarding your handling, safekeeping or transporting of your documents (commonly referred to as "record retention" or "document retention") and the identity of all documents concerning same. This includes but is not limited to:

- a. The identity of each present and former corporate department, division or subdivision responsible for maintaining records;
- b. How the records were/are kept, e.g., in boxes, files, on microfilm, microfiche or computer tape or disk;
- c. Dates that the record keeping system covers;
- d. The location(s) where such records are/were maintained;
- e. Whether there are any indices, databases, lists or other compilations summarizing or identifying the documents.
- f. Whether the documents currently maintained include the universe of documents that ever existed.

33. The manner in which you maintained in the regular course of business documents between 1930 until you stopped selling, distributing, manufacturing, supplying, installing and/or marketing asbestos-containing vehicles and/or products (e.g. how were your documents maintained prior to any uniform "centralization" efforts, if any, pursuant to which documents were moved to/housed in a "repository" or "repositories") and all documents concerning the manner in which documents are maintained.

34. How you maintained, collected and assembled your documents prior to placement into a repository or other centralized location for purposes of litigation and identify all documents concerning protocols for such maintenance, collection and assembly.

35. How you maintained, collected and assembled your documents for placement into a

repository or other centralized location for purposes of litigation and identify all documents concerning protocols for such maintenance, collection and assembly.

36. Whether any documents concerning your design and manufacture of asbestos-containing vehicles, your use/sale of asbestos-containing products, asbestos-related testing, exposure levels (whether on your premises, during the manufacturing process, when servicing your vehicles or otherwise), knowledge of the hazards of asbestos, claims your vehicles could not operate safely or as designed without asbestos-containing braking systems, your employees' asbestos-related injuries/disease, the design of your vehicles and/or the friction products used in your vehicles, training materials, warnings (including those you claim to have provided on products you sold), and any other subject matters relevant to the claims and defenses in this case that existed at one time at one time have been destroyed, lost, discarded and/or otherwise are unavailable and, if so, identify what documents are no longer available, when precisely those documents became unavailable and how it is that the documents are no longer available and why, and the identity of all documents concerning same.

37. What Ford's Asbestos Friction Collection DVD ("DVD collection") is comprised of, to include detailing the origins of the "DVD collection," from where the documents came and whether the "DVD collection" contains the universe of documents in your possession, custody or control concerning your design and manufacture of asbestos-containing vehicles, your use/sale of asbestos-containing products, asbestos-related testing, exposure levels (whether on your premises, during the manufacturing process, when servicing your vehicles or otherwise), knowledge of the hazards of asbestos, claims your vehicles could not operate safely or as designed without asbestos-containing braking systems, product change requests, engineering specification warnings, packaging, your employees' asbestos-related injuries/disease, or any other subject matters relevant to the claims and defenses in this case and the identity of all documents concerning same.

38. How the documents comprising the "DVD collection" (and any supplements thereto) were selected for inclusion in the "DVD collection," to include identifying each individual who performed the search for documents, how the search was performed (including whether search terms were used and/or inputted into any databases or searchable formats), how any databases, lists, indices or other compilations utilized in searching for documents were formed/generated, what search terms were used and how such search terms are/were arrived at (including but not limited to the precise terms used in any search undertaken in each search for documents), and whether any documents identified during a search were not added to the "DVD collection," and if so, who made that decision and what method is used to identify which documents identified during a search are not included (*i.e.* privilege log etc.), how it is that the documents were added to the "DVD collection" via supplementation, and how it has been determined that past searches failed to capture relevant documents that resulted in supplementations to the "DVD collection" and the identity of documents concerning same.

39. All efforts to index, organize or otherwise make the information in any historic document collections accessible and the identity of documents concerning same, including:

- a. Whether Ford its counsel, its insurers or any other entity has ever

undertaken to digitize any or all of the Defendants' document repository or other collection of historic documents regarding asbestos and the asbestos litigation;

- i. If so, what efforts were undertaken;
- ii. What the result of such efforts were;
- iii. The present custodian of the results;
- iv. If the results are no longer in existence, what happened to them;
- v. The identity of every entity that has ever received a copy of or been given access to the results.

b. Whether Ford, its counsel, its insurers or any other entity has ever undertaken to index, categorize or otherwise organize any or all of the Abex or other collection of historic documents regarding asbestos and the asbestos litigation;

- i. If so, what efforts were undertaken;
- ii. What the result of such efforts were;
- iii. The present custodian of the results;
- iv. If the results are no longer in existence, what happened to them;
- v. The identity of every entity that has ever received a copy of or been given access to the results.

40. All workers' compensation claims filed by Defendant's employees alleging asbestos-related diseases (asbestosis, lung cancer, mesothelioma, gastrointestinal cancer, etc.) and the identity of all documents concerning same.

41. The existence of any data regarding the incidence of asbestos-related diseases (asbestosis, lung cancer, mesothelioma, gastrointestinal cancer, etc.) among employees or former employees of the Defendant and the specifics of what information exists, in what form, where, and whether it has ever been disclosed to any person who was not an employee of the Defendant, including Defendants' employees, litigation consultants, non-litigation consultants, government or regulatory agencies or any other person or entity and the identity of all documents concerning same.

42. The supplier and/or manufacturer of any asbestos, asbestos-containing products and/or component parts of products manufactured or sold by Ford and the identity of all documents concerning same.

44. Material Safety Data Sheets created for all asbestos-containing friction materials manufactured, distributed, sold, used, and/or specified by Defendant, and provide a witness to authenticate and discuss the creation of the Material Safety Data Sheets.

45. All demands from any other entity to the Defendant that the Defendant indemnify such entity from asbestos personal injury claims arising from the use by such entity of asbestos containing friction products manufactured by the Defendant and the identity of all documents

concerning same.

46. The identity of all persons known to Ford and its lawyers who may have personal knowledge of facts relevant to this case and a description of the knowledge known to each such person, whether or not Ford intends to call such person as a witness at trial and the identity of all documents concerning same.

47. All information concerning Robert C. Fish and any individual Ford identifies in response to Area of Inquiry No. 46 and the identity of all documents concerning same.

48. The specific factual basis of each *Swigert*, third-party and/or cross-claims raised by you in this matter, and the identity of all documents, including transcripts and other documents, that you claim support each such defense.

49. The specific factual basis for any defenses or claims you have asserted or intend to assert in this case, and the identity of all documents, including transcripts and other documents, that you claim support each such fact, defense or claim.

50. The factual basis for each of your answers to interrogatories served in this case and the identity of all documents concerning same.

51. The documents requested in Plaintiffs' written discovery requests in this case and the documents produced by you in this case.

52. The source, chain of custody, author, recipient and/or authenticity of any document you produced in this case, including all documents on the DVD collection and other documents produced by you separately.

53. The total amount of compensation paid by Ford or on its behalf to any expert witness whom Ford may call at trial in this matter from the time Ford first hired such witness. With respect to expert witnesses who are employed by other companies, such as Exponent, ChemRisk, CardnoChemRisk, et. seq., this request includes the total amount of compensation paid to that firm by Ford or on its behalf, whether or not for the services of the particular expert witness it is calling in this case and the identity of all documents concerning same.

54. If Ford contests the authenticity of any of the documents on Plaintiff's Ford exhibit list, attached hereto as **Exhibit C** to this Schedule and for which a copy of all such documents has been sent to Ford with this Notice, any factual basis Ford contesting the authenticity of the document and documents concerning same.

Deponent/Defendant may, if it so desires, designate the matters on which each person it designates will testify. The person or persons so designated shall appear and testify at the time

and place set forth in this Notice. In addition to the matters set forth above, Plaintiffs reserve the right to make inquiry into any area relevant to this litigation of each witness produced.

DOCUMENTS TO BE PRODUCED

Deponent is requested to produce, be prepared to testify to, and bring with him and/or her at the time of deposition the below documents, pursuant to Rules 30 and 34 of the Federal Rules of Civil Procedure, and any other applicable rules.

1. All documents that relate or pertain to, or that reflect or evidence, any of the information requested in Topics 1 – 54 above.

2. Any documents used to refresh the recollection of the designated witness and/or to prepare that person to testify. This includes any and all documents or testimony that the deponent has ever reviewed from concerning the areas of inquiry listed herein, including but not limited to any indices, lists, spreadsheets or other type of document whether maintained in excel, hard-copy, electronic format or in any other format via any means.

Respectfully submitted,

/s/ Jacqueline G. Badders

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CERTIFICATE OF SERVICE

I hereby certify that on this 28th day of October 2016, a copy of the foregoing was served upon all counsel of record as referenced in the attached Service List via electronic mail.

/s/ Jacqueline G. Badders
Jacqueline G. Badders

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

Robert C. Fish, et al.,

Plaintiffs,

v.

Air & Liquid Systems Corporation, et al.

Defendants.

* * * * *

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* Case No.: 1:16-cv-00496-GLR
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EXHIBIT A



Inter Office

Ford Parts and Service Division

June 1, 1981

Mr. M. H. Hamberg

Subject: EPA/OSHA Asbestos Exposure Program

As requested, we have reviewed the attached slide-tape script and (2) brochures regarding asbestos poisoning and make the following comments:

- There is an inconsistency between the two brochures in the mention of brake vacuums. In the slide-tape script, pages 10, 11 and 12 refer to using a industrial or shop vacuum. Further emphasis for a shop vacuum designed for asbestos usage or a efficient filtering and disposal system, like that mentioned in the larger brochure would be appropriate.
- One popular brake cleaning method the program does not address is the coffee can method. This method is simply using a coffee can filled with parts cleaner solvent from the parts washer and brushing off the brake assembly holding the can under it. Because technicians are paid by the job (flat rate), cleaning a brake with a vacuum is not always done, even if the garage has the equipment; it becomes awkward, time consuming and costly. Brake washers are fine, but they are a fairly new product and there are few in use in the field. The coffee can method is used by technicians who are aware of asbestos poisoning but don't have the sophisticated equipment or take the time to use it. This paper should address this method and its' safety impact in areas such as solvent disposal (Do you pour down the drain or put it back in the parts washer?).
- Consider suggesting to Mr. Guimonda that the brochure and slide-tape refer to people who work on cars as technicians, rather than mechanics. This is a practice adopted by Ford and G.M. which technicians prefer.
- In the area of program effectiveness, the brochure suggests (pg. 74) displaying a poster to remind people of the dangers of asbestos poisoning. Because it is not readily available, the EPA might consider making a poster available and including it with the distribution of brochures. A poster hung in the garage area might prove to be the most effective reminder of the dangers of asbestos poisoning.

There are currently (4) four class action suits pending against Ford Motor Company for asbestos poisoning by former Ford dealer technicians. I suggest you review this material and your prepared response to EPA/OSHA with Wanda Jones (x42476) to assure it does not adversely affect those lawsuits.

011476

D. E. Schwenk
D. E. Schwenk



PROPERTY OF
FORD MOTOR COMPANY

PRODUCED BY FORD IN ALLEN

PRODUCED BY FORD

FAFD0011078

EXHIBIT B

INDUSTRIAL HYGIENE DISCUSSIONAL
UNIVERSITY OF MICHIGAN
NOVEMBER 5-6, 1970

FILE MEMORANDUM

Attendance at this annual discussional is by invitation to the directors of industrial hygiene in large corporations who have been in this work for long periods of time. Those at the 1970 session were from these companies:

- | | |
|-------------------------|----------------------|
| Allis-Chalmers | Kaiser |
| Bell Telephone Labs | Mobil |
| Chrysler | Proctor and Gamble |
| Dow Chemical | Standard Oil-Indiana |
| Eastman Kodak | Texaco |
| Eli Lilly | 3M Company |
| Firestone | Union Carbide |
| Ford Motor | Uniroyal |
| General Motors | U. S. Steel |
| Imperial Oil | Upjohn |
| International Harvester | Wyandotte Chemicals |

None of the discussions are published. Some of the items discussed, not necessarily in order of importance, are the following:

Oil Mist Sampling - There is a need for standard methods that can be used by oil company customers. We advised the group that the API Committee on Industrial Hygiene is preparing a manual.

Asbestos Hazard - A dust concentration of 5 million particles per cubic foot of air will prevent asbestosis. Whether this level will prevent other lung diseases, such as cancer and mesothelioma, has not been established as yet.

Liability Insurance - The increased activities in the consumer protection field has resulted in a reluctance by some

022659
TEX 10344

EXHIBIT C

Exhibits	Date	Description
FO-001	2/22/68	Intra-Company Communication From Gratch to Marande, re: Monthly Progress Report
FO-002	00/00/1970	Exposure to Asbestos During Brake Maintenance, Hickish and Knight
FO-003	2/20/70	Intra-Company Letter From Lick to Feller, re: Evaluation of Asbestos Worker Exposure
FO-004	11/16/70	Intra-Company Letter from Ninomiya to Misch, re: Asbestos Emissions From Brake Lining Wear
FO-005	12/15/70	Letter From Weinstock to Libby
FO-006	11/19/71	Intra-Company Letter, From Nonomiya to Damian, re: Fibrous Asbestos Emissions
FO-007	3/7/73	Inter-Office Letter From Lick to Keller, re: Asbestos in Air Sampling
FO-008	5/16/73	Inter-Office Letter from Toth to Keller, re: Asbestos Exposure
FO-008a	5/16/73	Inter-Office Letter from Toth to Keller, re: Asbestos Exposure as used in the Daly Trial
FO-009	5/29/73	Inter-Office Letter from Lick to Keller, re: Asbestos Fiber Air Sampling
FO-010	5/29/73	Inter-Office Letter from Anderson to Knauss, re: Asbestos Fiber Emissions During Brake Servicing
FO-011	5/30/73	Handwritten Note from Bamford to St. John/Turner, re: Brake Repair Dust Collection
FO-012	6/4/73	Scientific Research Staff, Technical Report, "Asbestos Emissions from Brake Dynamometer Tests"
FO-013	6/19/73	Inter-Office Letter from Keller to Veazey, re: Asbestos
FO-014	7/26/73	Notification Card from Veazey of Excessive Dust Concentration
FO-015	8/3/73	Inter-Office Letter from Toth, re: Vehicle Brake Re- building
FO-016	8/20/73	Inter-Office Letter from Plasters to Keller, re: Asbestos in Air Sampling
FO-017	11/16/73	Inter-Office Letter from Knauss, re: Controlling Asbestos Exposure
FO-018	1/3/74	Note to Julien from Bates, re: OSHA Safety Regulation Attachment
FO-019	2/8/74	Inter-Office Letter from Lick o Thomas, re: Asbestos Fiber Emission from Rotunda Vacuum Cleaner Models
FO-020	3/8/74	Inter-Office Letter from Anderson to Compton, re: Brake Maintenance Shop Worker Dust Exposure
FO-021	4/23/75	Letter from Toth to Cole, re: Exposure of Garage Mechanics to Brake Dust
FO-022	7/24/75	Product Engineering Evaluation
FO-023	10/24/75	Technical Service Bulletin- Ford Parts and Service Division- Bulletin No. 99 - "Our Goal: No Unhappy Owners"

Exhibits	Date	Description
FO-023a	10/24/75	Technical Service Bulletin- Ford Parts and Service Division- Bulletin No. 99- "Our Goal: No Unhappy Owners"
FO-024	12/00/1975	Product Engineering Evaluation
FO-025	1/23/76	Technical Service Bulletin
FO-025a	1/23/76	Technical Service Bulletin as produced in the Daly Trial
FO-026	00/00/1977	"Cleaning and Inspection" from Car Shop Manuel
FO-027	00/00/1977	Dealer Catalog Rotunda
FO-028	11/3/77	Inter-Office Letter from Lee to Larsen, re: Employee Exposure to Asbestos
FO-029	11/15/77	Inter-Office Letter from Goering to Barbour, re: Health Hazards Relating to Brake Lining Repair
FO-030	2/14/79	Inter-Office Letter from Lee to Valentine, re: Employee Exposure to Asbestos
FO-031	9/19/79	Note from Vranian to Velte with Attached minutes
FO-032	1/19/81	Inter-Office Letter from Toth to Clemett, re: Industrial Hygiene Survey
FO-033	3/9/81	Inter-Office Letter from Wabeke to Woodward, re: Materials Analysis for Asbestos
FO-034	3/17/81	"Possible Actions to take on Asbestos Report." by Woodward
FO-035	00/00/1983	Summary of Ford Liability Coverage
FO-036	2/24/83	Ford Motor Company, Brake Assembly and Lining Suppliers- Revised Draft
FO-037	11/1/83	Health/Safety/Environmental Hazard Information, "Asbestos Brake Clutch Servicing"
FO-038	11/9/83	Vaugh, et/al/ v. Raymark Industries,et.al., United States District Court, Eastern District of Missouri, Eastern Division, No. 82-1655-C(A): D, Ford's Answers to Ps' Interrogs.
FO-039	11/21/83	Member Selection List
FO-040	12/1/83	Letter from Braun, re: Ford's HIF Membership
FO-041	2/9/84	Pippins v. Owens-Corning Fiberglass Corp.,et.al
FO-042	3/2/84	London v. Flintkote CO,et.al., Court of Common Pleas No. 6849, Philadelphia County
FO-043	3/15/84	Horn v. Bendix Corp. Et.al., Superior Court of the State of Washington, King County, No. 80-2-09935-3: Ford's Response to Plaintiffs' First Interrogatories
FO-044	8/2/84	London v. Flintkote Co.,et.al., Ford's Response to Plaintiffs' Document Request
FO-045	9/14/84	Bellin v. Eagle Picher Industries, et.al., Circuit Court of the 11 th Judicial Circuit of Florida, Dade County, No. 84-27650: Ford's Response to Plaintiffs' Interrogatories

Exhibits	Date	Description
FO-046	4/8/86	Gartner v. Eagle-Picher Industries, et.al. Superior Court of New Jersey, Law Division. Middlesex County, Civil Action No. L-085585-85: D Ford's Response to Ps' Interrogatories
FO-047	06/00/1986	EPA Publication "Guidance for Preventing Asbestos Disease Among Auto Mechanics"
FO-048	09/00/1986	EPA Publication "Controlling Brake Dust to Protect Your Health... What every Auto Mechanic Should Know"
FO-049	03/00/1992	SOMA Study "Asbestos Exposure Associated With Automotive Mechanics For: Asbestos Friction Defendants"
FO-050	00/00/00	Summary of Ford Answers to Interrogatories
FO-051	00/00/00	Environmental Facts Article "Asbestos: No Risk to the General Public"
FO-052	00/00/00	Asbestos Information, Including brake info., from McChesney
FO-053	00/00/00	Handwritten Note from Lick (to engineers?)
FO-054	00/00/1983(?)	Letter and Attachment concerning asbestos warning
FO-055	07/00/1968	Report 41/68: Exposure to Asbestos During Servicing of Brakes of Passenger Cars, by Hickish
FO-056	10/00/1968	Report 52/68: Exposure to Asbestos Dust During Brake Maintenance Operations on Commercial Vehicle, Fleet Repair Garage, Dagenham, by Hickish
FO-057	11/16/70	Letter from Selikoff to Girl Scouts of the USA
FO-058	11/2/70	Letter from Gealer to Manning (Girl Scouts of Detroit)
FO-059	12/00/1970	Girl Scouts of Metropolis in Detroit, "Warns of Asbestos Dust" Gealer quoted.
FO-060	2/27/70	Intra Company Letter from Gealer to Simpson, re: Asbestos in brake lining Wear Debris
FO-061	10/20/70	Intra Company Letter from Gealer to Simpson, re: Asbestos Emissions from Brake Lining Wear
FO-062	03/23/0970	Intra Company Letter from Pretocelli to Marande, re: Monthly Highlights for March
FO-063	4/14/70	Program to Establish the Nature of Particulate Emissions from Brake Lining Wear, by Gealer
FO-064	7/12/71	Friction Materials and Systems, by Anderson
FO-065	9/22/71	Transmission form Gealer to Damian, FYI
FO-066	2/28/73	Compton on Vehicle Safety A04 (pp.3-6)
FO-067	11/00/1973	A04 Vehicle Safety, Friction Materials
FO-068	11/13/72	Inter Office Letter from Yapp to Toth and Lick with Attachment from Obringer to Yapp
FO-069	11/16/73	Inter Office Letter from Knauss to Schou, re: Controlling Asbestos Exposure
FO-070	12/10/73	Letter From Selikoff to Block
FO-071	1/7/74	A04 Vehicle Safety, Friction Materials, by Compton

Exhibits	Date	Description
FO-072	1/11/74	Letter from Block to Selikoff
FO-073	1/15/74	Handwritten note, with attachments
FO-074	1/17/74	Letter from Selikoff to Block
FO-075	03/00/1974	Brake-Drum Decomposition Products - Current Research Ares, March 1973 - March 1974
FO-076	4/19/74	Inter Office Letter from Gealer to Harwood, re: SRS Research Grant
FO-077	2/20/75	File memo, Ford Motor Company Industrial Hygiene Section
FO-078	4/14/75	Cole Note with attachment from Gealer to Cole (re: Exposure of Brake Maintenance Shop Workers to Brake Dust)
FO-079	6/12/75	Inter Office letter from Gealer to Coulson, re: SRS Research Grant
FO-080	7/16/75	Inter Office letter from Plasters to Ritchie, re: Industrial Hygiene Evaluation
FO-081	09/00/1975	Management News Bulletin, A.S.I.A., re: Asbestos Health Hazards
FO-082	8/8/75	Current Intelligence Bulletin #5, with letter from Lloyd
FO-083	1/12/76	Letter from Svoboda to Rosslip, with attachment from Slavin
FO-084	2/17/76	Letter from Craft to Toth, with minutes from meeting on occupational exposure to asbestos dust during brake and clutch servicing
FO-085	8/1/77	Request for Health Hazard Evaluation, Complaint of Occupational Health Hazard
FO-086	10/28/77	General Field Bulleting from Graziano, re: Rotunda Service Shop Safety Equipment Promotion
FO-087	11/15/77	Inter Office Letter from Goering to Barbour, re: Health Hazards Relating to Brake Lining Repair
FO-088	5/19/78	Letter from Sechan to Belek with attachment on asbestos brake drum dust
FO-089	5/31/78	Memo from Zelek to Anderson re: Automobile Brake Drum Dust Characterization
FO-090	7/17/78	Note from Crookes to Hinton re: Exposure to Asbestos Dust During Brake Cleaning
FO-091	10/9/78	Letter from Lee to Senterfit, Subject: Response to G. Gowans Request for material analysis for asbestos
FO-092	2/25/80	Note to Durstine with attachment from Kourik (re: Consideration on Regulating the Composition of Brake Lining)
FO-093	09/00/1981	Manufacturing Guideline: Recommended Work Practices for Handling Asbestos
FO-093a	09/00/1981	Manufacturing Guideline: Recommended Work Practices for Handling Asbestos as used in the Daly Trial
FO-094	09/00/1981	Manufacturing Guideline, signed by McChesney
FO-095	00/00/0000	Arnold E. Anderson, CV

Exhibits	Date	Description
FO-096	5/26/73	Inter office letter from Bartosiewicz to Anderson re: Determination of Asbestos Fiber Count in Air Samples Collected at the Transportation Garage
FO-097	3/23/76	Letter from Rohl to Eichen with manuscript of Asbestos exposure during brake lining and repair
FO-098	3/22/89	Letter from Anderson to Krause
FO-099	8/18/81	Car Program Direction Letter, subject: Toxic Substance Plan for Removing Asbestos
FO-100	00/00/0000	Bibliography of Carcinogenic Effects of Asbestos or Asbestos Dust
FO-101	6/4/73	Asbestos Emissions from Brake Dynamometer Tests
FO-102	00/00/0000	Francis v. Viola III, CV
FO-103	8/29/87	Note to all Counsel from Cifaldi
FO-104	00/00/1976	"Asbestos Exposure during Brake Lining Maintenance and Repair," by Rohl, Langer, Wolff and Weisman
FO-105	00/00/0000	Lorimer, et al "Asbestos Exposure of Brake Repair Workers," pp. 208-218
FO-106	00/00/0000	List of articles on asbestos and health hazards
FO-107	6/1/87	Ford's Response to Plaintiff's Interrogatories, Schramm vs. Eagle-Pitcher, et al. Superior Court of NJ, Middlesex County, No. L-080949-86
FO-108	00/00/1970	Car Shop Manual
FO-109	00/00/1970	Cortina Car Shop Manual
FO-110	00/00/1971	Car Shop Manual
FO-111	00/00/1971	Truck Shop Manual, Volume 1: Chassis
FO-112	00/00/1972	Car Shop Manual, Volume 1: Chassis
FO-113	00/00/1972	Truck Shop Manual Volume 1: Chassis
FO-114	00/00/1972	Capri Shop Manual
FO-115	00/00/1973	Car Shop Manual Volume 1: Chassis
FO-116	00/00/1973	Truck Shop Manual, Volume 1: Chassis
FO-117	00/00/1973	Courier Truck Shop Manual
FO-118	00/00/0000	General Clutch Service
FO-119	00/00/1974	Truck Shop Manual, Volume 1: Chassis
FO-120	00/00/1975	Car Shop Manual, Volume 1: Chassis
FO-121	00/00/1975	Truck Shop Manual, Volume 1: Chassis
FO-122	00/00/1975	Car Shop Manual, Volume 1: Chassis
FO-123	00/00/1976	Truck Shop Manual, Volume 1: Chassis
FO-124	00/00/1977	Car Shop Manual, Volume 1: Chassis
FO-125	00/00/1977	Truck Shop Manual, Volume 1: Chassis
FO-126	00/00/1978	Car Shop Manual, Volume 1: Chassis
FO-127	00/00/1978	Truck Shop Manual, Volume 1: Chassis
FO-128	00/00/1979	Car Shop Manual, Volume 1: Chassis

Exhibits	Date	Description
FO-129	00/00/1979	Light Truck Shop Manual
FO-130	00/00/1980	Car Shop Manual
FO-131	00/00/1980	Light Truck Shop Manual
FO-132	00/00/1981	Car Shop Manual
FO-133	00/00/1981	Light Truck Stop Manual
FO-134	00/00/1981	Ford Courier Truck Shop Manual
FO-135	00/00/1981	Medium/Heavy Truck Shop Manual
FO-136	00/00/1982	Car Shop Manual.
FO-137	00/00/1982	Light Truck Shop Manual
FO-138	00/00/1982	Shop Manual (Escort, Lynx, etc.)
FO-139	00/00/1983	Car Shop Manuals: Body, Chassis, Electrical
FO-140	00/00/1983	Car Shop Manuals: Powertrain, etc.
FO-141	00/00/1983	Light Truck Shop Manual
FO-142	00/00/0000	Drum Brake Description
FO-143	00/00/0000	Health and Safety Precautions and braking system information
FO-144	8/10/88	Letter from Melhuish to Cifaldi with brake product information
FO-145	00/00/0000	Under Vehicle Maintenance Procedures, Rear Drum Brake Inspection, with warnings (handwritten date of 1981)
FO-146	11/11/77	Technical Service Bulletin: Car and Light Commercial
FO-147	3/28/78	Transcontinental Service Bulletin, Subject: Asbestos
FO-148	00/00/0000	Section 12.02, Rear Drum Brakes, with warnings
FO-149	00/00/000	Part 12.01, General Hydraulic Brake Service, with warnings
FO-150	00/00/0000	Robert O. Williams, CV
FO-151	05/00/1973	"Asbestos Emissions from Brake Dynamometer Tests," by Anderson, Gealer, McCune and Sprys
FO-152	07/00/1968	IHF "Report on Pulmonary Response to Brake-Drum Dust: A Preliminary Investigation for Johns-Manville," by Gross
FO-153	00/00/0000	Passenger Car Shop Manual Brake Sections (assorted)
FO-154	03/00/1947	Industrial Hygiene Digest
FO-155	06/00/1947	IHF Hemeon Dust Investigation for Asbestos Textile Institute
FO-156	11/1/48	Transactions of 12 th IHF Annual Meeting
FO-157	08/00/1949	Industrial Hygiene Digest
FO-158	01/00/1950	Industrial Hygiene Digest
FO-159	09/00/1950	Industrial Hygiene Digest
FO-160	01/00/1952	Industrial Hygiene Digest
FO-161	09/00/1952	Industrial Hygiene Digest
FO-162	06/00/1953	Industrial Hygiene Digest
FO-163	00/00/1953	Annual Index of Industrial Hygiene Digest
FO-164	07/00/1955	Industrial Hygiene Digest
FO-165	09/00/1955	Industrial Hygiene Digest
FO-166	08/00/1955	Industrial Hygiene Digest

Exhibits	Date	Description
FO-167	03/00/1956	Proposed Epidemiological Study of Lung Cancer in Asbestos Workers for the Quebec Asbestos Mining Association
FO-168	09/00/1956	Industrial Hygiene Digest
FO-169	04/00/1957	Industrial Hygiene Digest
FO-170	07/00/1956	Epidemiological Study of Lung Cases in Asbestos Miners for the Quebec Asbestos Mining Association
FO-171	08/00/1960	Industrial Hygiene Digest
FO-172	10/00/1960	Industrial Hygiene Digest
FO-173	02/00/1961	Industrial Hygiene Digest
FO-174	03/00/1961	Industrial Hygiene Digest
FO-175	08/00/1961	Industrial Hygiene Digest
FO-176	12/00/1962	Industrial Hygiene Digest
FO-177	03/00/1963	Industrial Hygiene Digest
FO-178	05/00/1963	Industrial Hygiene Digest
FO-179	04/00/1964	Industrial Hygiene Digest
FO-180	01/00/1965	Industrial Hygiene Digest
FO-181	03/00/1965	Industrial Hygiene Digest
FO-182	06/00/1965	Industrial Hygiene Digest
FO-183	07/00/1965	Industrial Hygiene Digest
FO-184	01/00/1966	Industrial Hygiene Digest
FO-185	00/00/1966	IHF Annual Report
FO-186	04/00/1966	Industrial Hygiene Digest
FO-187	05/00/1966	Industrial Hygiene Digest
FO-188	07/00/1966	Industrial Hygiene Digest
FO-189	09/00/1966	Industrial Hygiene Digest
FO-190	10/00/1966	Industrial Hygiene Digest
FO-191	01/00/1967	Industrial Hygiene Digest
FO-192	02/00/1967	Industrial Hygiene Digest
FO-193	08/00/1967	Industrial Hygiene Digest
FO-194	12/00/1967	Industrial Hygiene Digest
FO-195	05/00/1968	Industrial Hygiene Digest
FO-196	06/00/1968	Industrial Hygiene Digest
FO-197	08/00/1968	Industrial Hygiene Digest
FO-198	01/00/1969	Industrial Hygiene Digest
FO-199	03/00/1969	Industrial Hygiene Digest
FO-200	07/00/1971	Industrial Hygiene Digest
FO-201	11/00/1971	Industrial Hygiene Digest
FO-202	11/00/1973	Industrial Hygiene Digest
FO-203	01/00/1974	Industrial Hygiene Digest
FO-204	00/00/0000	Answers to Plaintiffs' First Set of Interrogatories; Kinz v. Allied Signal
FO-205	03/00/1989	Article "Asbestos" by. Selikoff

Exhibits	Date	Description
FO-206	00/00/1948	Publication (Baltimore)
FO-207	5/25/73	Handwritten memorandum from R.A.
FO-208	5/29/73	Letter from Henry B. Lick to J.A. Keller, re: Asbestos Sampling (Fiber Air)
FO-209	8/23/73	Memo from Williams to Messrs. re: vehicle brake rebuilding
FO-210	7/8/76	Bulletin from Donley to Regional and District Managers -FPSD re: Rotunda Shop Safety Equipment Promotion
FO-211	5/27/80	Engineering and Research Subcommittee Manufacturing and Supply Subcommittee Carcinogens in the Workplace Task Force Report
FO-212	6/1/86	EPA booklet titled "Guidance for Preventing Asbestos Disease Among Auto Mechanics:
FO-213	5/13/80	Abex Memorandum from J.J. Brown to J.J. Lukas; re: O.E. Priorities; with handwritten comments of J. Lukas dated 05/15/1980
FO-214	1/1/70	The Annals of Occupational Hygiene, Vol. 13, 1970
FO-214a	1/1/70	The Annals of Occupational Hygiene, Vol. 13, 1970: D.E. Hickish - Exposure to Asbestos During Brake and Clutch Maintenance
FO-214b	1/1/70	The Annals of Occupational Hygiene, Vol. 13, 1970: W.J. Smither - Asbestos and Asbestosis
FO-214c	1/1/70	The Annals of Occupational Hygiene, Vol. 13, 1970: S.A. Roach - Hygiene Standards for Asbestos
FO-214d	1/1/70	The Annals of Occupational Hygiene, Vol. 13, 1970: D.E. Hickish and K.L. Knight - Exposure to Asbestos During Brake Maintenance
FO-214e	1/1/70	The Annals of Occupational Hygiene, Vol. 13, 1970: S. Luxon - Technical Implementation of the New Asbestos Regulations
FO-214f	1/1/70	The Annals of Occupational Hygiene, Vol. 13, 1970Z: D. Hatch - Possible Alternatives to Asbestos as a Friction Material
FO-214g	1/1/70	The Annals of Occupational Hygiene, Vol. 13, 1970: M.L. Bentley - Control of the use of asbestos-containing friction materials
FO-214h	1/1/70	The Annals of Occupational Hygiene, Vol. 13, 1970: G.L. Lee - Removing dust from brake assemblies during vehicle servicing - alternative cleaning methods
FO-214i	1/1/70	The Annals of Occupational Hygiene, Vol. 13, 1970: K.L. Knight and D.E. Hickish - Investigations into alternative forms of control for dust generated during the cleaning of brake assemblies and drums
FO-214j	1/1/70	The Annals of Occupational Hygiene, Vol. 13, 1970: S. Luxon - respirators for protection against asbestos.
FO-215	11/21/80	Ford Motor Company letter from J.A. Brown and R.C. Machen to Executive Director, Directors; Subject: Asbestos Survey Report

Exhibits	Date	Description
FO-216	8/22/83	Ford Motor Company Industrial Relations Bulletin no. 4 - titled, Industrial Hygiene, Subject Asbestos (Duplicate of FO-238)
FO-217	8/22/83	Ford Motor Company Industrial Relations Bulletin No. 4B, titled; Industrial Hygiene - Subject: Asbestos Insulation Removal and Repair (Supplement to Bulletin No. 4)
FO-218	10/24/75	Ford Motor Company Technical Service Bulletin No. 99 - Ford Parts and Service Division - "Our goal: No Unhappy Owners."
FO-219	5/2/80	Document entitled: Executive Summary - Carcinogens in the Workplace
FO-220	4/29/83	Ford Motor Company Inter Office memo from A.R. Amberg, Industrial Hygienist, Industrial Hygiene and Toxicology Department, Employee Health Services To: Leroy Jaggars, Section Supervisor, Reliability Laboratory, Building 4, Subject: Industrial Hygiene Survey - Asbestos Exposures at Brake and Tire Laboratory
FO-221	4/8/76	Ford Motor Company Letter from A.N. Updegrove to E. Mignogna, American Cleaning Equipment Corporation; Subject: Asbestos fiber emission tests performed on the vacuum cleaner submitted by American Cleaning Corp. (With attachments)
FO-222	7/21/73	Department of Health, Education and Welfare, NDC, NIOSH; Minutes of Occupational Exposures to Asbestos Dust from Brake Linings Meeting
FO-223	7/1/68	Report 41/68; Exposure to Asbestos During Servicing of Brakes of Passenger Cars by Hickish
FO-224	10/1/68	Report 52/68: Exposure to Asbestos Dust During Brake Maintenance Operations on Commercial Vehicles, Fleet Repair Garage, Dagenham, by Hickish
FO-225	12/1/70	Girl Scouts of Metropolitan Detroit, Warns of Asbestos Dust @ Gealer quoted
FO-226	1/1/54	Bibliography of Carcinogenic Effects of Asbestos or Asbestos Dust; Indexes checks from 1954-November 1965
FO-227	1/1/76	Article entitled, Asbestos Exposure During Brake Lining Maintenance and Repair @ by Rohl, Langer, Wolff and Weisman
FO-228	5/1/76	Lorimar, et al. Asbestos Exposure of Brake Repair Workers @ pp. 208-218
FO-229	7/1/68	IHF Report on Pulmonary Response to Brake-Drum Dust: A Preliminary Investigation for Johns-Manville, @ by Gross
FO-230	6/1/81	Inter Office Memo to Mr. M.H. Hamber re: EPA/OSHA Asbestos Exposure Program
FO-231	5/18/73	Chart Brake Lining Dust Removal Survey by R.M. Quarles
FO-232	3/31/70	Letter to Willake, Safety Engineer, Sheldon Road Plant from Paul Toth regarding dust exposure - Sheldon Road Plant

Exhibits	Date	Description
FO-233	11/15/71	Letter from Henry Lick to Willake regarding dust exposure - Sheldon Road Plan
FO-234	8/1/73	Maintenance Bulletin 137 regarding exposure to asbestos fiber inhalation during brake and clutch inspection and rebuilding
FO-235	11/7/46	Affidavit regarding authenticity of "Transactions of Eleventh Annual Meeting of Industrial Hygiene foundation of America, Inc. 11/07/1946"
FO-236	00/00/1994	Ford-General Brakes Theory and Operation
FO-237	6/2/75	Letter from D.L. Block to Paul Kotin, M.D. re: Meeting with Selikoff two weeks prior about Physical exams on first 100 or so individuals who have done brake maintenance.
FO-238	8/22/83	Ford Motor Company Industrial Relations Bulletin No. 4a; Subject: Asbestos Brake and Clutch Servicing (Supplement to Bulletin No. 4)
FO-239	6/11/75	Inter Office Memo: from J. W. Armstrong to John J. Kiopelle re: Dr. Selikoff's Visit to the "Big Three"
FO-240	7/21/73	Department of Health, Education, and Welfare; NDC, NIOSH; Minutes of Occupational Exposures to Asbestos Dust From Brake Linings Meeting.
FO-241	1/1/70	Duplicate of FO-214
FO-242	1/12/59	What's New in Brake Linings by Newell H. McCuen
FO-243	01/07/191	Industrial Hygiene Survey from O'Brien to Clemett
FO-244	3/5/74	Letter to J.A. Keller about Industrial Hygiene Studies at Arizona Proving Grounds
FO-245	8/22/83	Industrial Relations Bulletin, No. 4a, Subject: Asbestos Brake and Clutch Servicing
FO-246	1/5/05	Electronic Field Communications Subject: Repair and Body Shop Safety and Pollution Training
FO-247	2/8/05	CCAR Press Release, Ford Motor Company Advocates CCAR's "S/P2" Training to Ford and Lincoln-Mercury Dealers
FO-248	3/14/05	CCAR press Release, Ford Motor Company Adopts CCAR's "S/P2" Training to Technical Career Entry Programs
FO-249	8/9/06	S/P2 Online University Training, Mechanical Pollution Prevention Asbestos
FO-250	00/00/1994	ABS Theory and Operation
FO-251	00/00/1994	General Brakes Theory and Operation Self-Study Student Reference Book
FO-252	3/31/98	FCSD Technical Training Interactive Study Guide, General Brake Theory and Operation
FO-253	6/19/06	S/P2 Online University Training, Mechanical Pollution Prevention Asbestos, Weitz and Luxenberg
FO-254	11/20/07	CCAR Affiliate Organization listing from website

Exhibits	Date	Description
FO-255	11/20/07	CCAR Heading from website
FO-256	11/20/07	CCAR Main Page from website
FO-257	11/20/07	CCAR 2005-2006 Officers and Board of Directors from website
FO-258	6/12/06	Web Based Training, Brake Service Procedures
FO-259	00/00/1994	1994 General Brake Theory and Operation Manual
FO-260	00/00/0000	S/P2 testimonials from website
FO-261	5/2/05	Ford Manual, Passenger Car Brakes, Step on it
FO-262	5/2/78	Interoffice Memo, Subject: Medical Monitoring, Asbestos Exposure
FO-263	8/23/72	Interoffice Memo, Subject: Potential Future Status of Asbestos-Containing Materials
FO-264	4/14/64	American Motorist Insurance Co., Letter from William H. Krebs to W.E. Leeder
FO-265	8/14/80	Letter from D.S. Sugano to Dr. Block regarding Mesothelioma Mortality
FO-266	8/25/78	Letter to R.H. Barbour regarding the death of Woodie Thompson from mesothelioma
FO-267	6/7/78	Letter to S.T. McRay regarding asbestos use and required employee medical monitoring
FO-268	4/19/79	Customer Call Report, Calidria Asbestos, salesman Edward J. Kleber
FO-269	5/9/78	Customer Call Report, Union Carbide Spray Plastic Sealant, Report of Call, Union Carbide, "Ford's primary concern was in the
FO-270	1/3/73	safe handling of asbestos so that at some future date, contractors now handling asbestos and developing lung complications could not easily place the responsibilities onto Ford Motor co."
FO-271	6/18/73	Report of Call, Union Carbide Corporation, "Ford was to run a trial of a nonasbestos premix. This trial has been run and is considered successful."
FO-272	11/19/77	Customer call Report, Metals Division, UCC, Call Objective: Try to find out what Ford's policy on the use of asbestos is...."Ford is in no panic to get rid of asbestos."
FO-273	10/20/77	Customer Call Report, Metals Division, UCC, Call Obj: Deliver dust control engineering information
FO-274	10/6/77	Customer Call Report, Metals Division, UCC, Call Obj: Present seminar to Ford on how to use asbestos safely.
FO-275	4/12/77	Customer Call Report, Metals Divisionl UCC, "we went over the usual toxicology rundown and Bob saus that even if the RG-244 works...our biggest battle may well be with Ford's hygienists. I answered that we were prepared to fight that battle."

Exhibits	Date	Description
FO-276	5/9/78	Customer Call Report, Metals Division, UCC, Call Obj: Determine status of spray plastisol sealant project.
FO-277	2/9/79	Customer Call Report, Metals Division, UCC, Call Obj: Find out if there's a place for "Calidria" in the hot melt sealant program."
FO-278	3/1/99	Customer Call Report, UCC, re: Carolyn B. Zelek's position at Ford
FO-279	3/2/79	Customer Call Report, UCC, Call Obj: Determine what Ford's position on an asbestos-containing vinyl plastisol spray sealer is.
FO-280	9/11/79	Customer Call Report, UCC, "He has no plans to try to institute a ban on asbestos-containing products at Ford and in fact, seems to think the whole asbestos controversy is a bit ridiculous."
FO-281	2/12/80	Customer Call Report, UCC, " Larry confirmed that Ford is 'investigating' the possibility of removing asbestos from its cars."
FO-282	00/00/0000	Ford Tune-Up and Repair Manual
FO-283	00/00/1971	Ford- Parts And Accessories Ready Reference Catalog
FO-284	00/00/1973->	JM-Ford Meeting Documents
FO-285	7/11/77	JM- Letter from DM Kelleher to M. Harris, RE: Asbestos and Health Meetings- Major Customers (GE, GM, Ford, etc.)
FO-286	1973-1975	Plaintiff's Johns Manville Exhibits Regarding Ford, General Motors and Chrysler
FO-287	7/23/87	Letter from Jerome S. Amber, Principal Staff Engineer, stationary Source Environmental Control Office; re: CARB Asbestos Information Request- Asbestos Brake and Clutch Data (FAFD1 2021-2023)
FO-288	12/30/09	Nayman Lawso, et al v. ACandS, Inc., et al; Case Affected: Lewis Shifflett: Deposition of Leonard Brown
FO-289	12/29/09	EXHIBIT 1- Nayman Lawso, et al v. ACandS, Inc., et al; Case Affected: Lewis Shifflett: Notice of Deposition Duces Tecum of Leonard Brown on behalf of Ford Motor Company
FO-290	11/16/09	EXHIBIT 2- <i>Nayman Lawso, et al v. ACandS, Inc., et al</i> ; Case Affected: Lewis Shifflett: Deposition of Leonard Brown; Ford Motor Company's Rule 2-402(e) Lists of Experts and Fact Witnesses with Expertise
FO-291	12/19/09	EXHIBIT 3- Nayman Lawso, et al v. ACandS, Inc., et al; Case Affected: Lewis Shifflett: Deposition of Leonard Brown: Cross-Notice to Take Oral Deposition of Leonard Brown
FO-292	8/00/1973	EXHIBIT 4- Nayman Lawso, et al v. ACandS, Inc., et al; Case Affected: Lewis Shifflett: Deposition of Leonard Brown; (Maintenance Bulletin No. 137) Plant Engineering Office Manufacturing Staff- Exposure to Asbestos Fiber Inhalation During Brake and Clutch Inspection and Rebuilding

Exhibits	Date	Description
FO-293	11/15/77	EXHIBIT 5- Nayman Lawso, et al v. ACandS, Inc., et al; Case Affected: Lewis Shifflett: Deposition of Leonard Brown: Inter-Office Correspondence from W.A. Goering to C.R. Barbour- Car Product Development Group, re: Health Hazards Relating to Brake Lining Repair
FO-294	8/22/83	EXHIBIT 6- Nayman Lawso, et al v. ACandS, Inc., et al; Case Affected: Lewis Shifflett: Deposition of Leonard Brown; Industrial Relations Bulletin No. 4, Industrial Hygiene- Employee Health Services: re: Asbestos
FO-295	8/22/83	EXHIBIT 7- Nayman Lawso, et al v. ACandS, Inc., et al; Case Affected: Lewis Shifflett: Deposition of Leonard Brown; Industrial Relations Bulletin No. 4a, Industrial Hygiene- Employee Health Services; re: Asbestos Brake & Clutch Servicing - (Supplement to Bulletin No. 4)
FO-296	5/10/77	EXHIBIT 8- Nayman Lawso, et al v. ACandS, Inc., et al; Case Affected: Lewis Shifflett: Deposition of Leonard Brown; Re: Asbestos Substitute Materials Meeting
FO-297	7/11/77	EXHIBIT 9- Nayman Lawso, et al v. ACandS, Inc., et al; Case Affected: Lewis Shifflett: Deposition of Leonard Brown; JM-Letter from DM Kelleher to M. Harris, RE: Asbestos and Health Meetings- Maior Customers (GE. GM. Ford. etc.) - W/ Affidavit
FO-298	12/8/09	Nayman Lawso, et al v. ACandS, Inc., et al; Case Affected: Lewis Shifflett;; Plaintiffs' Opposition to Defendant Ford Motor Company's Motion in Limine to Preclude Admission of or Reference to the EPA Document Entitled "Guidance for Preventing Asbestos Disease Among Auto Mechanics"
FO-299	6/00/1986	EXHIBIT A- Nayman Lawso, et al v. ACandS, Inc., et al; Case Affected: Lewis Shifflett;; Plaintiffs' Opposition to Defendant Ford Motor Company's Motion in Limine: EPA Guidline; Asbestos Action Program- Guidance for Preventing Asbestos Among Auto Mechanics
FO-300	4/12/01	EXHIBIT B- Nayman Lawso, et al v. ACandS, Inc., et al; Case Affected: Lewis Shifflett;; Plaintiffs' Opposition to Defendant Ford Motor Company's Motion in Limine: <i>Thomas L. Srenaski, JR., v. Allied Signal, Inc., f/k/a Bendix Corp., et al.</i> : Deposition of William M. Weing. CIH
FO-301	12/2/09	EXHIBIT C- Nayman Lawso, et al v. ACandS, Inc., et al; Case Affected: Lewis Shifflett;; Plaintiffs' Opposition to Defendant Ford Motor Company's Motion in Limine: Notice of Deposition of Bryan D. Hardin. Ph.D.

Exhibits	Date	Description
FO-302	1/5/05	EXHIBIT D- Nayman Lawso, et al v. ACandS, Inc., et al; Case Affected: Lewis Shifflett; Plaintiffs' Opposition to Defendant Ford Motor Company's Motion in Limine: Electronic Field Communications- Al Rocker
FO-303	12/13/09	<i>Nayman Lawson, et al v. ACandS, Inc., et al</i> ; Case Affected, Lewis Shifflett; Plaintiffs' Opposition to Defendant Ford Motor Company's Motion for Summary Judgment
FO-304	00/00/2007	EXHIBIT 1- Nayman Lawson, et al v. ACandS, Inc., et al; Case Affected, Lewis Shifflett; Plaintiffs' Opposition to Defendant Ford Motor Company's Motion for Summary Judgment; First Amended Complnait and Prayer for Jury Trial
FO-305	1/24/08	EXHIBIT 2- Nayman Lawson, et al v. ACandS, Inc., et al; Case Affected, Lewis Shifflett; Plaintiffs' Opposition to Defendant Ford Motor Company's Motion for Summary Judgment; De Bene Esse Deposition of Lewis Shifflett
FO-306	12/7/09	EXHIBIT 3- Nayman Lawson, et al v. ACandS, Inc., et al; Case Affected, Lewis Shifflett; Plaintiffs' Opposition to Defendant Ford Motor Company's Motion for Summary Judgment; Deposition of Sheldon Rabinovitz. PhD. CIH
FO-307	1/24/08	EXHIBIT 4- Nayman Lawson, et al v. ACandS, Inc., et al; Case Affected, Lewis Shifflett; Plaintiffs' Opposition to Defendant Ford Motor Company's Motion for Summary Judgment; Deposition of Lewis Shifflett. Vol. IV
FO-308	9/14/09	EXHIBIT 5- Nayman Lawson, et al v. ACandS, Inc., et al; Case Affected, Lewis Shifflett; Plaintiffs' Opposition to Defendant Ford Motor Company's Motion for Summary Judgment; Deposition of Mavbrev Joan Shifflett
FO-309	9/14/09	EXHIBIT 6- Nayman Lawson, et al v. ACandS, Inc., et al; Case Affected, Lewis Shifflett; Plaintiffs' Opposition to Defendant Ford Motor Company's Motion for Summary Judgment; Deposition of John Shifflett
FO-310	1/23/08	EXHIBIT 7- Nayman Lawson, et al v. ACandS, Inc., et al; Case Affected, Lewis Shifflett; Plaintiffs' Opposition to Defendant Ford Motor Company's Motion for Summary Judgment; Deposition of Lewis Shifflett. Vol. III
FO-311	11/9/09	EXHIBIT 8- Nayman Lawson, et al v. ACandS, Inc., et al; Case Affected, Lewis Shifflett; Plaintiffs' Opposition to Defendant Ford Motor Company's Motion for Summary Judgment; Letter from Rabinovitz to Harry Johnson re: Shifflett v. Ford; Rabinovitz Expert Report

Exhibits	Date	Description
FO-312	12/10/75	EXHIBIT 9- Nayman Lawson, et al v. ACandS, Inc., et al; Case Affected, Lewis Shifflett; Plaintiffs' Opposition to Defendant Ford Motor Company's Motion for Summary Judgment; Arthur Rohl, Langer, et al., "Asbestos Exposure During Brake Lining Maintenance and Repair", Environmental Research 12, Environmental Sciences Laboratory
FO-313	6/00/1986	EXHIBIT 10- Nayman Lawson, et al v. ACandS, Inc., et al; Case Affected, Lewis Shifflett; Plaintiffs' Opposition to Defendant Ford Motor Company's Motion for Summary Judgment; EPA Guidline; Asbestos Action Program- Guidance for Preventing Asbestos Among Auto Mechanics
FO-314	4/11/77	EXHIBIT 11- Nayman Lawson, et al v. ACandS, Inc., et al; Case Affected, Lewis Shifflett; Plaintiffs' Opposition to Defendant Ford Motor Company's Motion for Summary Judgment; Inter Office Correspondence from A.E. Anderson, et al, to E. Gretch, et al, re: Non-Asbestos Friction Materials w/ new proposal
FO-315	5/10/77	EXHIBIT 12- Nayman Lawson, et al v. ACandS, Inc., et al; Case Affected, Lewis Shifflett; Plaintiffs' Opposition to Defendant Ford Motor Company's Motion for Summary Judgment; Re: Asbestos Substitute Materials Meeting
FO-316	2/23/79	EXHIBIT 13- Nayman Lawson, et al v. ACandS, Inc., et al; Case Affected, Lewis Shifflett; Plaintiffs' Opposition to Defendant Ford Motor Company's Motion for Summary Judgment; Inter Office Correspondence from G.C. Hague to C.J. Anderson, et al., re: Non-Asbestos Development Status
FO-317	11/00/1950?	EXHIBIT 14- Nayman Lawson, et al v. ACandS, Inc., et al; Case Affected, Lewis Shifflett; Plaintiffs' Opposition to Defendant Ford Motor Company's Motion for Summary Judgment; Proceedings of the National Workshop on Substitutes for Asbestos
FO-318	11/19/71	EXHIBIT 15- Nayman Lawson, et al v. ACandS, Inc., et al; Case Affected, Lewis Shifflett; Plaintiffs' Opposition to Defendant Ford Motor Company's Motion for Summary Judgment; Letter from J.S. Ninomiya to J.U. Damian, et al., re: Fibrous Asbestos Emissions
FO-319	2/00/1982	EXHIBIT 16- Nayman Lawson, et al v. ACandS, Inc., et al; Case Affected, Lewis Shifflett; Plaintiffs' Opposition to Defendant Ford Motor Company's Motion for Summary Judgment; Life Cycle of Asbestos in Commercial & Industrial Use Including Estimates of Releases to Air, Water and Land- US EPA, Office of Toxic Substances (Final In-house Report)

Exhibits	Date	Description
FO-320	7/11/77	EXHIBIT 17- Nayman Lawson, et al v. ACandS, Inc., et al; Case Affected, Lewis Shifflett; Plaintiffs' Opposition to Defendant Ford Motor Company's Motion for Summary Judgment; JM- Letter from DM Kelleher to M. Harris, RE: Asbestos and Health Meetings- Major Customers (GE, GM, Ford, etc.) - W/ Affidavit
FO-321	8/00/1973	EXHIBIT 18- Nayman Lawson, et al v. ACandS, Inc., et al; Case Affected, Lewis Shifflett; Plaintiffs' Opposition to Defendant Ford Motor Company's Motion for Summary Judgment; (Maintenance Bulletin No. 137) Plant Engineering Office Manufacturing Staff- Exposure to Asbestos Fiber Inhalation During Brake and Clutch Inspection and Rebuilding
FO-322	11/15/77	EXHIBIT 19- Nayman Lawson, et al v. ACandS, Inc., et al; Case Affected, Lewis Shifflett; Plaintiffs' Opposition to Defendant Ford Motor Company's Motion for Summary Judgment; Inter-Office Correspondence from W.A. Goering to C.R. Barbour- Car Product Development Group, re: Health Hazards Relating to Brake Lining Repair
FO-323	9/00/1981	EXHIBIT 20- Nayman Lawson, et al v. ACandS, Inc., et al; Case Affected, Lewis Shifflett; Plaintiffs' Opposition to Defendant Ford Motor Company's Motion for Summary Judgment; Ford Manufacturing Guideline- G3-19; Recommended Work Practices for Handling Asbestos
FO-324	8/22/83	EXHIBIT 21- Nayman Lawson, et al v. ACandS, Inc., et al; Case Affected, Lewis Shifflett; Plaintiffs' Opposition to Defendant Ford Motor Company's Motion for Summary Judgment; Industrial Relations Bulletin No. 4a, Industrial Hygiene- Employee Health Services; re: Asbestos Brake & Clutch Servicing - (Supplement to Bulletin No. 4)
FO-325	8/22/83	EXHIBIT 22- Nayman Lawson, et al v. ACandS, Inc., et al; Case Affected, Lewis Shifflett; Plaintiffs' Opposition to Defendant Ford Motor Company's Motion for Summary Judgment; Industrial Relations Bulletin No. 4, Industrial Hygiene- Employee Health Services; re: Asbestos
FO-326	9/00/1984	EXHIBIT 23- Nayman Lawson, et al v. ACandS, Inc., et al; Case Affected, Lewis Shifflett; Plaintiffs' Opposition to Defendant Ford Motor Company's Motion for Summary Judgment; Ford Manufacturing Guideline- G3-19; Recommended Work Practices for Handling Asbestos

Exhibits	Date	Description
FO-327	10/14/86	EXHIBIT 24- Nayman Lawson, et al v. ACandS, Inc., et al; Case Affected, Lewis Shifflett; Plaintiffs' Opposition to Defendant Ford Motor Company's Motion for Summary Judgment; Industrial Relations Bulletin, No. 4- Industrial Hygiene- Employee Health Services
FO-328	4/00/2006	EXHIBIT 25- Nayman Lawson, et al v. ACandS, Inc., et al; Case Affected, Lewis Shifflett; Plaintiffs' Opposition to Defendant Ford Motor Company's Motion for Summary Judgment; 2007 Taurus Workshop Manual
FO-329	6/00/2006	EXHIBIT 26- Nayman Lawson, et al v. ACandS, Inc., et al; Case Affected, Lewis Shifflett; Plaintiffs' Opposition to Defendant Ford Motor Company's Motion for Summary Judgment; 2007 Ranger Workshop Manual
FO-330	9/00/2005	EXHIBIT 27- Nayman Lawson, et al v. ACandS, Inc., et al; Case Affected, Lewis Shifflett; Plaintiffs' Opposition to Defendant Ford Motor Company's Motion for Summary Judgment; Ford Workshop Manual- 2006 Ranger
FO-331	11/9/83	EXHIBIT 28- Nayman Lawson, et al v. ACandS, Inc., et al; Case Affected, Lewis Shifflett; Plaintiffs' Opposition to Defendant Ford Motor Company's Motion for Summary Judgment; <i>Gloria Vaughn, et al v. Raymark Industries, Inc., et al</i> - Answers of Defendant Ford Motor Company to Plaintiff's Interrogatories
FO-332	10/24/75	EXHIBIT 29- Nayman Lawson, et al v. ACandS, Inc., et al; Case Affected, Lewis Shifflett; Plaintiffs' Opposition to Defendant Ford Motor Company's Motion for Summary Judgment; Technical Service Bulletin- Ford Parts and Service Division- Bulletin No. 99
FO-333	00/00/0000	EXHIBIT 30- Nayman Lawson, et al v. ACandS, Inc., et al; Case Affected, Lewis Shifflett; Plaintiffs' Opposition to Defendant Ford Motor Company's Motion for Summary Judgment; Ford General Brakes Theory and Operations (DVD Cover)... PDF- FCSD- Technical Training- Interactive Study Guide
FO-334	00/00/0000	EXHIBIT 31- Nayman Lawson, et al v. ACandS, Inc., et al; Case Affected, Lewis Shifflett; Plaintiffs' Opposition to Defendant Ford Motor Company's Motion for Summary Judgment; Ford General Brakes Theory and Operations (DVD Cover)... PDF- Brake Systems- General Brake Theory & Operation, Self Study Student Reference Book
FO-335	00/00/0000	EXHIBIT 32- Nayman Lawson, et al v. ACandS, Inc., et al; Case Affected, Lewis Shifflett; Plaintiffs' Opposition to Defendant Ford Motor Company's Motion for Summary Judgment; FCSD Technical Training

Exhibits	Date	Description
FO-336	00/00/1970	EXHIBIT 33- Nayman Lawson, et al v. ACandS, Inc., et al; Case Affected, Lewis Shifflett; Plaintiffs' Opposition to Defendant Ford Motor Company's Motion for Summary Judgment; D.E. Hickish & K.L. Knight- "Exposure to Asbestos During Brake Maintenance", Medical Services
FO-337	7/00/1968	EXHIBIT 34- Nayman Lawson, et al v. ACandS, Inc., et al; Case Affected, Lewis Shifflett; Plaintiffs' Opposition to Defendant Ford Motor Company's Motion for Summary Judgment; Report 41/68- Exposure to Asbestos during the Servicing of Brakes of Passenger Cars. by Dr. D.E. Hickish. Industrial Hygiene Specialist
FO-338	00/00/0000	EXHIBIT 35- Nayman Lawson, et al v. ACandS, Inc., et al; Case Affected, Lewis Shifflett; Plaintiffs' Opposition to Defendant Ford Motor Company's Motion for Summary Judgment; Advance Auto Parts- Replacing Brake Shoes- Website step-by-step
FO-339	00/00/0000	Corporate Case Presentation Outline- Ford Motor Company, Ford Liability Case- Prepared by Alfred P. Montero
FO-340	00/00/0000	Ford Motor Company- Corporate Liability History- Created by Alfred P. Montero
FO-341	00/00/1970	Cover Only- 1970 Letter from Gealer to Manning; RE: Literature in Medical and Environmental Health indicating the relationship between exposure to asbestos and serious lung disease
FO-342	12/15/09	<i>Jimmy Toole v. Georgia-Pacific, LLC, et al</i> ; Deposition of Mark Taylor
FO-343	12/9/09	EXHIBIT 1- Jimmy Toole v. Georgia-Pacific, LLC, et al; Deposition of Mark Taylor; First Amended Notice to Take Rule 30(b)(6) Video Deposition of Mark Taylor and Notice to Produce to Ford Motor Company
FO-344	12/9/09	EXHIBIT 2- Jimmy Toole v. Georgia-Pacific, LLC, et al; Deposition of Mark Taylor; Email from Martha Steele to Mark Taylor re: topics Mark Taylor is to Testify to
FO-345	00/00/1971	EXHIBIT 3- Jimmy Toole v. Georgia-Pacific, LLC, et al; Deposition of Mark Taylor; Parts & Accessories Ready Reference Catalog- Autolite- Ford
FO-346	not dated	EXHIBIT 4- Jimmy Toole v. Georgia-Pacific, LLC, et al; Deposition of Mark Taylor; AAMCO Brake Grinder Display "Brake Service Method"- Pictures
FO-347	10/3/06	EXHIBIT 5- Jimmy Toole v. Georgia-Pacific, LLC, et al; Deposition of Mark Taylor; Pictures of Brake Grinder, taken on 10/3/2006
FO-348	not dated	EXHIBIT 6- Jimmy Toole v. Georgia-Pacific, LLC, et al; Deposition of Mark Taylor; Motorcraft Ford Page

Exhibits	Date	Description
FO-349	5/10/77	EXHIBIT 7- Jimmy Toole v. Georgia-Pacific, LLC, et al; Deposition of Mark Taylor; Memo- Asbestos Substitute Materials Meeting; Page 2
FO-350	Many Dates	EXHIBIT 8- Jimmy Toole v. Georgia-Pacific, LLC, et al; Deposition of Mark Taylor; Car Shop Manuals, Bulletins (1970, 71, 72, 73, 75, 81, 82, 83, etc)
FO-351	11/19/71	EXHIBIT 9- Jimmy Toole v. Georgia-Pacific, LLC, et al; Deposition of Mark Taylor; To: J.U.Damian, From: J.S. Ninomiya re: Fibrous Asbestos Emissions
FO-352	5/10/77	EXHIBIT 10- Jimmy Toole v. Georgia-Pacific, LLC, et al; Deposition of Mark Taylor; Memo- Asbestos Substitute Materials Meeting (Full Memo)
FO-353	5/13/80	EXHIBIT 11- Jimmy Toole v. Georgia-Pacific, LLC, et al; Deposition of Mark Taylor; Abex Letter from J.J. Brown to J.U. Lukas; Amendment to May 12 Memo
FO-354	7/11/77	EXHIBIT 12- Jimmy Toole v. Georgia-Pacific, LLC, et al; Deposition of Mark Taylor; Letter to M. Harris, From D.M. Kelleher; re: Asbestos and Health Meetings- Major Customers (G.E. G.M. Ford. etc.)- Johns-Manville- Internal Correspondence
FO-355	00/00/1994	EXHIBIT 13- Jimmy Toole v. Georgia-Pacific, LLC, et al; Deposition of Mark Taylor; General Brake Theory and Operation, Brake Systems- Self-Study Student Reference Book
FO-356	not dated	EXHIBIT 14- Jimmy Toole v. Georgia-Pacific, LLC, et al; Deposition of Mark Taylor; Program slides "This Program is for Ford and Mercury dealership technician use..."
FO-357	not dated	EXHIBIT 15- Jimmy Toole v. Georgia-Pacific, LLC, et al; Deposition of Mark Taylor; Brake Theory DVD Video
FO-358	2/8/05	EXHIBIT 16- Jimmy Toole v. Georgia-Pacific, LLC, et al; Deposition of Mark Taylor; Ford Motor Company Advocates CCAR's "S/P2" Training to Ford and Lincoln-Mercury Dealers; S/P2 Safety Pollution Prevention
FO-359	not dated	EXHIBIT 17- Jimmy Toole v. Georgia-Pacific, LLC, et al; Deposition of Mark Taylor; S/P2- Mechanical Pollution Prevention Introduction- Training Course Pages
FO-360	2/28/73	EXHIBIT 18- Jimmy Toole v. Georgia-Pacific, LLC, et al; Deposition of Mark Taylor;
FO-361	2/11/87	EXHIBIT 19- Jimmy Toole v. Georgia-Pacific, LLC, et al; Deposition of Mark Taylor; Engineering and Manufacturing Staff- Technical Report No.- EM-7-08; Status Report on Non-Asbestos Brake Linings- 1987; A.E. Anderson- Vehicle Methods & Components Department engineering and Manufacturing Staff

Exhibits	Date	Description
FO-362	not dated	EXHIBIT 20- Jimmy Toole v. Georgia-Pacific, LLC, et al; Deposition of Mark Taylor; "Motorcraft- the Newest Name in Car Parts"
FO-363	8/00/1974	EXHIBIT 21- Jimmy Toole v. Georgia-Pacific, LLC, et al; Deposition of Mark Taylor; Motorcraft- The Parts People, Ford Motor Company of Canada
FO-364	00/00/1974	EXHIBIT 22- Jimmy Toole v. Georgia-Pacific, LLC, et al; Deposition of Mark Taylor; 1974 All Products Catalog (Motorcraft)
FO-365	9/00/1930	EXHIBIT 23- Jimmy Toole v. Georgia-Pacific, LLC, et al; Deposition of Mark Taylor; Motorcraft Release/Concern Cover
FO-366	not dated	EXHIBIT 22- Jimmy Toole v. Georgia-Pacific, LLC, et al; Deposition of Mark Taylor; BRAKES; Car, Econoline, 100-400 Series Trucks (Service Handbook)
FO-367	1975.05.00	Barry Castleman, Lucille Camarota, et al.: "The Hazards of Asbestos for Brake Mechanics"- Public Health Reports, Vo. 90, No. 3
FO-368	7/00/1998	DOD Hazardous Materials Information System, DOD 6050. 5-L, Product Information
FO-369	not dated	FORD Motor Co; Parts & Service Div; Gov't Sales - Ford US Asbestos, Product Information
FO-370	not dated	FORD Prim Brake Shoe Picture
FO-371	not dated	Dixon Day in the Life Video (Dixon Case)
FO-372	not dated	CD- Ford Video Clips for Trial (Dixon) GFP - EPA Don't Blow IT; MAS Brake Box Opening; MAS Hand Filing; MAS Hand Sanding; Ford-General Brakes Theory and Operation
FO-373	not dated	Don't Blow It Video
FO-374	1973.04.23	Letter from Paul E. Toth, Supervisor, Industrial Hygiene Section, to Mr. T. Cabs?, Chemistry Dept., Re: Exposure of Garage Mechanics to Brake Dust
FO-375	not dated	Brake Repair Can be Hazardous to Your Health
FO-376		
FO-377		
FO-378	2009.00.00	Excerpt of In Re: All Asbestos Litigation; <i>Larry Williams v. Advance Auto Parts, Inc.</i> , et al: Ford Motor Company's Answers to Plaintiff's Manufacture Interrogatories to Defendant
FO-378A	2009.00.00	In Re: All Asbestos Litigation; <i>Larry Williams v. Advance Auto Parts, Inc.</i> , et al: Ford Motor Company's Answers to Plaintiff's Manufacture Interrogatories to Defendant
FO-379	2009.05.01	National Cancer Institute Fact Sheet- Asbestos Exposure and Cancer Risk

Exhibits	Date	Description
FO-380	1980.05.27	Executive Summary Carcinogens in the Workplace
FO-381	2003.11.00	Motorcraft- Advanced Brake Service & Brake Lathe Training (Rocker 22)
FO-382	2006.01.00	Brake System Diagnosis & Repair Student Guide, January 2006 (Rocker 16)
FO-383	7/18/75	Ford Industrial Relations Bulletin 7-18-75
FO-384	8/22/83	1983 Ford Industrial Relations Bulletin
FO-385	1975-1978	JM documents regarding Gaskets, Huxley and Russian fiber
FO-386	1/22/73	JM Document-Letter to Medical Directors of Ford & GM re: Rumor regarding Eliminating Asbestos use
FO-387	00/00/1986	Truck Shop Manual - Body, Chassis, Electrical - Medium Heavy (September 1985)
FO-388		Fiber STD - Interrogatory: Please describe in detail the process whereby chrysotile asbestos is graded or classified (JM Friction)
FO-389	5/22/1968 & 10/17/1973	Various Product Specification Cancellations
FO-390		Drum and Disk Brakes catalog (Diagnose & Repair)
FO-391	2/20/87	Letter from Roger Wabeke to (many), re: Exposure of Brake Mechanics to Asbestos Fibers - Referencing Industrial Hygiene Bulletins 4, 4a, 4c - Mentions "Don't Blow It".
FO-392	00/00/1930-00/00/2011	Ford Annual Reports (1930-2011)
FO-393	12/00/1968	Army - Research and Development Monthly Magazine, Vol. 9, No. 11, Dept. of the Army, Washington, DC http://passthrough.fw-notify.net/download/626491/ http://asc.army.mil/docs/pubs/alt/archives/1968/Dec_1968.pdf
FO-394	4/6/72	Letter from C. Mauch, Supervisor, Body Section, Light Vehicles Dept (Ford), to Contracting Officer for Ford; RE: Alternate Brake Lining Materials for Use on M151 Vehicle
FO-395	7/11/77	Johns-Manville Memo discussing a meeting with Ford (also discusses GM and Chrysler)
FO-396	10/6/64	Newspaper Article discussing brake asbestos and how it can cause cancer
FO-397	0/0/1962	Service Handbook for the Econoline 100-100 series of Cars and Trucks
FO-398	0/0/1962	Service Handbook for the Econoline 100-100 series of Cars and Trucks excerpts highlighted
FO-399	0/0/1962	Same as 397 service handbook but with excerpts highlighted
FO-400	10/0/1968	Unpublished study discussing the exposure to asbestos dust in a fleet repair garage
FO-401	7/0/1968	Unpublished study discussing asbestos exposure while servicing the brakes of a passenger car

Exhibits	Date	Description
FO-402		
FO-403	0/0/1970	Published study on the exposure to asbestos during brake maintenance
FO-404	0/0/1971	Ford parts and accessories reference catalog
FO-405	6/0/1973	Asbestos Safety Bulletin
FO-406	8/0/1973	Maintenance Bulletin warning about asbestos exposure during brake maintenance
FO-407		INTENTIONALLY LEFT BLANK
FO-408	6/19/73	Ford inter office memo discussing asbestos
FO-409	7/17/74	Memo: Preston to Block and Tuth Attaching Article: A Review of the Scientific Knowledge on the Status of Asbestos as a Health Hazard as Related to Manufacturing Industries
FO-410	12/29/75	Liberty Mutual Memo to Ford Dealer Development Dealership Presidents re: Exposure to Asbestos Dust
FO-411	10/24/75	Ford Technical Service Bulletin Ford Parts and Service Division; Bulletin No. 99
FO-412	1/23/76	Ford Technical Service Bulletin Ford Parts and Service Division
FO-413	11/15/77	Ford inter office memo: Health Hazard Relating to Brake Lining Repair
FO-414	4/11/77	Ford inter office memo: Non-Asbestos Friction Materials
FO-415	4/11/77	Copy of FO-414
FO-416	4/11/77	Ford New Program Proposal Non-Asbestos Frictional Materials
FO-417	2/17/78	1978 Ford Supplier Research Want List
FO-418	4/4/79	Ford inter office memo Johns - Manville Company Meeting 3-23-79 D.M. McCarthy's Office
FO-419	8/31/79	Ford inter office memo: NAAO Car and Truck Engineering Practice Letter - Asbestos Content in Components
FO-420	Sept 19, 1979 October 2, 1979	Ford inter office memo Car Engineering Practices Letter Concerning Asbestos Content in New Components
FO-421	10/2/79	W.H. Anderson memo: Car engineering Practices Letter Banning Asbestos
FO-422	10/16/79	Ford inter office memo: Car Engineering Practices Letter Concerning Asbestos Content in New Components
FO-423	10/31/79	Ford inter office memo: Car Engineering Practice Letter Concerning Asbestos
FO-424	12/8/79	Ford inter office memo: Car Engineering Practice Letter Concerning Asbestos
FO-425	11/8/79	Ford inter office memo: Car Engineering Practice Letter Concerning Asbestos
FO-426	12/18/79	Ford memo NAAO Car and Truck Engineering Practice Letter

Exhibits	Date	Description
FO-427	3/17/80	Asbestos - Recommended Work Practices Plant Engineering Letter No. 80-1
FO-428	N/A	Executive Summary: Carcinogens in the Workplace
FO-429	9/0/81	Ford Recommended Work Practices for Handling Asbestos
FO-430		INTENTIONALLY LEFT BLANK
FO-431	7/18/75	Industrial Relations Bulletin: Industrial Hygiene
FO-432		Better copy of above document
FO-433	8/22/83	Industrial Relations Bulletin: Industrial Hygiene
FO-434	9/1/84	Recommended work Practices for Handling Asbestos
FO-435	3/15/85	Ford correspondence to EPA
FO-436	10/14/86	Industrial Relations Bulletin: Industrial Hygiene
FO-437	2/20/87	Ford inter office memo: Exposure of Brake Mechanics to Asbestos Fibers
FO-438	7/23/87	Ford memo CARB Asbestos Information Request Asbestos Brake and Clutch Data
FO-439	9/1/92	EPA Correspondence to Ford
FO-440	10/8/92	EPA Correspondence to GM
FO-441	10/27/92	Ford Draft of response to EPA correspondence
FO-442	11/20/92	Ford plan for removal of Asbestos from service parts
FO-443	2/22/95	Industrial Relations Bulletin: Industrial Hygiene
FO-444	5/13/80	Abex memo discussing the morality of asbestos brakes
FO-445	10/24/78	Ford Correspondence to a medical professional
FO-446	6/6/77	Handwritten letter to a Doctor
FO-447	N/A	Asbestos in Transmission Components document
FO-448	9/10/75	Ford inter office memo: D5AP-7934-AA - Phenolic Reactor to replace PMB-7934-A Aluminum Reactor for C4 - PMX
FO-449	June, 1973	Safe Operating Procedure for Emptying and Disposal of Asbestos Contents from Industrial Vacuum Units
FO-450	11/8/77	Ford Letter asking about alternatives to asbestos in brakes
FO-451	1/23/71	Handwritten letter discussing a science fair project involving asbestos in brakes
FO-452	8/22/78	Ford inter office memo: Employee Exposures to Airborne Asbestos

Exhibits	Date	Description
FO-453	4/6/78	Ford inter office memo: Industrial Hygiene Survey - Clutch Assembly Area Department 4980 Airborne Asbestos
FO-454	7/9/80	Ford internal memo: Industrial Hygiene Study- Asbestos Exposure- Clutch Packaging Operation- Dept. 250613
FO-455	11/8/73	Ford inter office memo: Evaluation of Asbestos Exposure - Receiving Inspection Area - Sterling Axle Plant
FO-456	7/9/80	Ford inter office memo: Parts Labeling for Asbestos-Containing Clutch Plates
FO-457	11/16/73	Ford inter office memo: Controlling Asbestos Exposure
FO-458	8/23/73	Ford inter office memo: Vehicle Brake Rebuilding
FO-459	N/A	Clutch; Manual Transmission and Clutch Pages from Manual
FO-460	12/1/78	Braking System Dual Air/Hydraulic pages from manual
FO-461	8/1/79	Braking System Airpak pages from manual
FO-462	N/A	R Series OP 2018-B Front Brake Shoes-Replace page from manual
FO-463	6/8/92	Translec correspondence discussing friction plates
FO-464	3/7/73	Ford inter office memo Asbestos in Air Sampling Research and Engineering
FO-465	N/A	DNA: Heavy Truck Clutch Resourcing/ Long Term Contract Proposal
FO-466	N/A	Note discussing Asbestos replacement
FO-467	10/19/92	Ford inter office memo: Phase-Out of Asbestos in New Vehicles
FO-468	4/11/79	Ford inter office memo: Asbestos Exposure Transmission Clutch Stacking Operation Livonia Transmission Plant
FO-469	3/15/85	Ford Letter to EPA
FO-470	10/24/83	Ford inter office memo: Industrial Hygiene Bulletins 14 and 42
FO-471	8/22/89	Ford product warning for asbestos
FO-472	N/A	Ford Parts Label
FO-473	N/A	Ford Parts Label
FO-474	7/12/79	Ford internal memo Asbestos Content In Dust From Clutch Discs - Detroit Parts Dept.
FO-475		INTENTIONALLY LEFT BLANK
FO-476	6/18/79	Clayton Environmental Consultants, Inc. Clutch Dust Test
FO-477	10/9/78	Ford internal memo: Response to G. Gowans Request for Material Analysis for Asbestos
FO-478	11/8/78	Ford internal memo: Employee Exposure to Dust During Automatic Boring and Asbestos During Clutch Disc Unpacking
FO-479	N/A	Revised Warnings in Shop Manuals
FO-480	8/21/80	Product warning label
FO-481	7/9/80	Ford inter office memo: Parts Labeling for Asbestos-Containing Clutch Plates

Exhibits	Date	Description
FO-482	3/18/82	Ford inter office memo: Industrial Hygiene Re-Study - Asbestos Fiber Exposures
FO-483	6/1/83	Ford internal memo: Industrial Hygiene Study - Arizona Proving Grounds
FO-484	9/20/83	Ford internal memo: discussing warning labels
FO-485	8/15/83	Ford internal memo: discussing asbestos exposure from brake and clutch servicing
FO-486	N/A	Executive Summary: Carcinogens in the Workplace
FO-487	5/29/87	Ford internal memo: Small Parts Seminar Technical Questions
FO-488	5/27/80	Engineering and Research Subcommittee Manufacturing and Supply Subcommittee: Carcinogens in the Workplace, Task Force Report
FO-489	August, 1979	Plan to replace asbestos in brakes
FO-490		Transmission & Axle Engineering Components Containing Asbestos
FO-491	3/23/70	Ford internal memo: Monthly Highlights for March 1970, Chemical Engineering Dept.
FO-492	3/15/84	Ford memo discussing purchase orders
FO-493	2/21/84	Ford memo discussing purchase orders
FO-494	N/A	Description of the AFM Company
FO-495	N/A	Bendix flow chart for the assembly of Ford Disc Brakes
FO-496	9/27/93	Ford internal memo: Alternate lining material for SN-95 Rear Brake
FO-497	N/A	List of Ford cars and the composition of the brake linings
FO-498	5/28/92	Ford Letter discussing the asbestos phase out
FO-499	10/27/92	Cover Letter for responses to the EPA questions
FO-500	4/1/91	Bendix memo: Asbestos Lining Alternatives
FO-501	4/12/92	Ford memo discussing concern over continued asbestos usage in brake linings
FO-502	3/12/92	Bendix Contact Report, a list of names and what some of them do
FO-503	7/23/87	Ford internal memo CARB Asbestos Information Request Asbestos Brake and Clutch Data
FO-504	5/16/73	Asbestos Exposure - Test Track Kingman Arizona
FO-505	5/29/73	Ford internal memo: Asbestos Fiber Air Sampling - Arizona Proving Grounds
FO-506	5/29/73	Data Sheet from the Arizona Proving Grounds
FO-507	5/29/73	Ford internal memo: Asbestos Fiber Emissions During Brake Servicing
FO-508	5/30/73	Ford internal memo: Brake Repair Dust Collection handwritten
FO-509	4/1/77	Ford Key Issue Report Asbestos Usage -1

Exhibits	Date	Description
FO-510	1/4/77	Ford internal memo: Choke Cap Material Approval
FO-511	5/1/97	List of Ford Parts with Asbestos
FO-512	6/27/05	Ford training manual
FO-513	N/A	Company Asbestos Components list of asbestos containing products
FO-514	2/8/84	Ford report on asbestos exposure from exhaust manifold sealing rings
FO-515	N/A	Ford Replacement Parts List
FO-516	4/1/81	Empty Ford Documents and a letter from the Michigan dept. of Natural Resources
FO-517		INTENTIONALLY LEFT BLANK
FO-518	11/4/91	Ford internal memo Compliance With EPA Asbestos Ban and Phase-out Rule
FO-519	10/17/89	Ford internal memo: EPA Asbestos Ban and Phase-out Rule
FO-520	N/A	List of Ford's complaints about asbestos exposure from working with cylinder head gaskets
FO-521	8/19/88	Ford correspondence discussing the asbestos in some aftermarket parts
FO-522	3/18/82	Ford internal memo: Industrial Hygiene Re-Study - Asbestos Fiber Exposures
FO-523	8/2/92	Ford internal memo: FAR Usage of Brake Lining
FO-524	N/A	Catalog of Asbestos containing products
FO-525	2/20/87	Ford internal memo: EXPOSURE of BRAKE MECHANICS to ASBESTOS FIBERS
FO-526	12/1/88	Ford Parts and Service Division: Remanufactured Products Specifications
FO-527	6/26/86	Ford internal memo: Proposal to Ament 40 CFR 763 - - Asbestos; Proposed Mining and Import Restrictions and Proposed Manufacturing Importation and Processing Prohibitions 51 Fed. Reg. 3738 (1986), as corrected as 51 Fed. Reg. 6571 (1986)
FO-528	1954-1956	Ford Library on Asbestos 1954-1956
FO-529	1958-1959	American Industrial Hygiene Association Membership Booklet 1958-1959
FO-530	7/31/14	Report of results Asbestos Fiber Release from Sanding Ford Brakes
FO-531	12/9/83	Ford Inter Office Memo

Exhibits	Date	Description
FO-532	9-Aug-91	Ford Inter Office Memo
FO-533	11-Jul-77	JM Memo concerning Ford
FO-534	31-Aug-79	Car engineering practices memo
FO-535	Sep-81	Ford Manufacturing Guideline-Recommended Work Practices For Handling Asbestos
FO-536	31-Jul-14	
FO-537	8-Aug-14	
FO-538	23-May-83	Ford Sales Agreement with C&M
FO-539	24-Nov-92	Memo regarding replacement parts
FO-540	9-Dec-83	Significant Events Report for November 1983
FO-541	Feb-48	National Safety News Article
FO-542	Jul-68	Report on Exposure to Asbestos during the Servicing of Brakes of Passenger Cars
FO-543	Oct-68	Exposure to Asbestos Dust during Brake Maintenance Operations on Commercial Vehicles, Fleet Repair
FO-544	Sep-75	Management News Bulletin Asbestos Health Hazards
FO-545	May 1976-June 1976	Asbestos Exposure of Brake Repair Workers in the United States
FO-546	20-Oct-70	Ford Memo Asbestos Emissions from Brake Lining Wear
FO-547	16-Nov-70	Ford Intra Company Memo Asbestos Emissions from Brake Lining Wear
FO-548	19-Nov-71	Ford Intra Company Memo Fibrous Asbestos Emissions
FO-549	16-May-73	Ford Inter Office Memo Asbestos Exposure - Test Track, Kingman, Arizona
FO-550	29-May-73	Ford Inter Office Memo Asbestos Fiber Air Sampling - Arizona Proving Grounds
FO-551		Friction Materials Standards Institute Record of the annual meeting
FO-552	3-Aug-73	Ford Inter Office Memo Vehicle Brake Rebuilding
FO-553	23-Aug-73	Ford Inter Office Memo P.E. Toth's Letter, Same Subject, Dated August 3, 1973 (Attached)
FO-554	14-Apr-75	Ford Inter Office Memo Exposure of Brake Maintenance Shop Workers to Brake Dust
FO-555	23-Apr-75	Ford Memo Exposure of Garage Mechanics to Brake Dust
FO-556	17-Jun-75	Ford Memo (Handwritten) Brake Repair Dust Collection
FO-557	11-Jul-75	Ford Inter Office Memo
FO-558	8-Aug-75	Current Intelligence Bulletin 5
FO-559	15-Nov-77	Ford Inter Office Memo Health Hazard Relating to Brake Lining Repair
FO-560	22-Aug-78	Industrial Hygiene Services Section Industrial Hygiene & Toxicology Department Employee Health Services
FO-561	17-Mar-80	Asbestos - Recommended Work Practices

Exhibits	Date	Description
FO-562	29-May-80	Ford Inter Office Memo ID of Asbestos Materials and Components Supplied to Ford Motor Company
FO-563	9-Jul-80	Ford Inter Office Memo Industrial Hygiene Study - Asbestos Exposure - Clutch Packaging Operation - Department 250613
FO-564	Sep-81	Ford Manufacturing Guideline Recommended Work Practices For Handling Asbestos
FO-565	18-Mar-82	Ford Inter Office Memo Industrial Hygiene Re-Study - Asbestos Fiber Exposures
FO-566	22-Aug-83	Industrial Relations Bulletin Asbestos Brake and Clutch Servicing
FO-567	18-Jul-75	Industrial Relations Bulletin Asbestos
FO-568	1-Dec-83	Industrial Health Foundation Memo
FO-569		Court Document Response of Defendant Ford Motor Company to Plaintiff's Interrogatories
FO-570	Jun-86	EPA Manual Guidance for Preventing Asbestos Disease Among Auto Mechanics
FO-571	Jun-86	EPA Manual Guidance for Preventing Asbestos Disease Among Auto Mechanics - Alternate
FO-572	20-Feb-87	Ford Inter Office Memo Exposure of Brake Mechanics to Asbestos Fibers
FO-573		Court Document Response to Defendant Ford Motor Company to Plaintiff's Interrogatories
FO-574		
FO-575	1988	1988 Car Shop Manual Vol. B
FO-576		Ford Brake Service Manual
FO-577	1975-1991	Front Disc Brake Linings - Asbestos Content
FO-578		Ford Brake Systems Manual General Brakes Theory and Operation Self-study student reference book
FO-579		
FO-580	14-Oct-86	Industrial Relations Bulletin Asbestos
FO-581	31-Mar-98	FCSD Technical Training Interactive Study Guide General Brake Theory and Operation
FO-582	Nov-03	Motorcraft Ford Motor Company Advanced Brake Service and Brake Lathe Training
FO-583	8-Feb-05	Safety and Pollution Prevention Ford Motor Company Advocates CCAR's "S/P2" Training to Ford and Lincoln-Mercury Dealers
FO-584		Ford Motor Company Material Safety Data Sheet Asbestos (All Forms)
FO-585	Jan-06	Ford Manual Advanced Brake Systems Diagnosis and Service
FO-586		S/P2 Online University Website Screen Printouts
FO-587		Preventing Asbestos Disease Among Auto Mechanics
FO-588		Safety and Pollution Prevention Testimonials Internet Explorer Screen Printout

Exhibits	Date	Description
FO-589	Jan-06	Ford Manual Brake System Diagnosis and Repair
FO-590	Mar-07	EPA Preventing Asbestos Exposure Among Brake and Clutch Repair Workers
FO-591		Photograph of Mechanic grinding down car brakes
FO-592	06/00/1974	Drum and Disc Brakes Key Points to Diagnose and Repair Brake Systems - Certified Training Program - Course 1201-504
FO-593	1970	Exposure to Asbestos During Brake Maintenance Exposure During Car Servicing
FO-594	29-May-73	Ford Inter Office Memo Asbestos Fiber Air Sampling Arizona Proving Grounds
FO-595	16-Nov-73	Ford Inter Office Memo Controlling Asbestos Exposure
FO-596		
FO-597	1-Dec-83	Industrial Health Foundation Memo
FO-598	Jun-86	Guidance for Preventing Asbestos Disease Among Auto Mechanics
FO-599	Sep-86	Controlling Brake Dust to Protect Your Health
FO-600	14-Apr-75	Ford Inter Office Memo Exposure of Brake Maintenance Shop Workers to Brake Dust
FO-601	17-Jul-78	Memo, Exposure to Asbestos Dust During Brake Cleaning
FO-602	Jul-70	Bibliography on Carcinogenic Effects of Asbestos or Asbestos Dust
FO-603	Nov-65	Bibliography on Carcinogenic Effects of Asbestos or Asbestos Dust
FO-604	Sep-81	Ford Manufacturing Guideline Recommended Work Practices For Handling Asbestos
FO-605	8-Jul-76	Ford General Field Bulletin Rotunda Shop Safety Equipment Promotion
FO-606	18-Sep-79	Ford Two Way Memo Handwritten
FO-607	17-Jun-75	Ford Memo Handwritten Brake Repair Dust Collection
FO-608	1-Jun-77	Key Issue Report dated April 1977 from Vehicle Materials Engineering
FO-609	28-Oct-77	General Field Bulletin Rotunda Shop Safety Equipment Precaution
FO-610		Service Shop Safety Equipment Rotunda Ford
FO-611	25-Sep-75	Ford Inter Office Memo Asbestos Dust Vacuum Cleaner Availability
FO-612		Asbestos Dust Caution Pamphlet
FO-613	Dec-76	Revised Recommended Asbestos Standard
FO-614		Video regarding a mechanic
FO-615		Manual, General Brake Theory and Operation
FO-616		Brake Systems abs theory and operation
FO-617	7-Jan-05	Ford Electronic Field Communications form

Exhibits	Date	Description
FO-618		Video
FO-619	20-Feb-87	Ford Inter Office Memo Exposure of Brake Mechanics to Asbestos Fibers
FO-620	23-Jul-87	Ford Memo CARB Asbestos Information Request
FO-621	26-Jun-86	Proposal to Ament 40 CFR 763
FO-622	10-Nov-83	Ford Memo Insulation-Fireproofing in Kentucky Truck Plant Fan Room
FO-623	23-May-83	Ford Sales and Service Agreement
FO-624	15-Aug-83	Ford Memo
FO-625		Asbestos - Containing Vehicle Products
FO-626	2014	2014 Ford Expedition and Navigator Manual
FO-627	7/9/80	Ford Inter Office Memo Industrial Hygiene Study - Asbestos Exposure - Clutch Packaging Operation - Department 250613
FO-628	11/8/78	Memo to Sharonville Transmission Plant re: clutch handling exposure
FO-629	5/14/79	Memo re: Industrial Hygiene Asbestos Study - Clutch Assembly Area
FO-630	5/17/79	Memo to Kentucky Truck Plant re: Industrial Hygiene Study of Asbestos Exposure
FO-631	10/1/84	Memo re: Industrial Hygiene Survey of Asbestos Fiber Exposure at Conveyor Loading of Brake Assembly
FO-632	2/22/95	Industrial Relations Bulletin No. 4; Subject Asbestos
FO-633	9/17/02	Draft correspondence from Patrick Sheehan, Ph.D. re: Friction Materials Litigation Support
FO-634	Undated	NIOSH Publication; Caution: Asbestos Dust...is Hazardous to Your Health
FO-635	2/1/75	Article: Interview with John B. Naughton, Ford VP Sales Group, "Some Firm Convictions" from Feb. 1, 1975 issue of Automotive Industries publication
FO-636	Undated	All documents produced by Ford Motor Company in the FAFD, FAFD1, FAFE and other document productions by Ford in the United States asbestos litigation
FO-637	6/8/81	Ford Motor Company Script for a Slide Presentation titled "Working with Asbestos" prepared by Employee Health Services
FO-638	10/18/83	Correspondence from H. Mattes of Ford Motor Company's Training & Publications Dept. to Helm Inc. re: Asbestos Dust
FO-639	11/1/83	Hazard statement to be included in each Shop Manual Set for 1984 Ford Motor Company Technical Service Bulletin No. 83-22
FO-640	08/00/1984	1985 Ranger/Bronco II Truck Loose Leaf Shop Manual
FO-641	10/14/86	Industrial Relations Bulletin No. 4a; Industrial Hygiene, Subject: Brake and Clutch Servicing

Exhibits	Date	Description
FO-642	00/00/1986	1986 Car Manual ; Body, Chassis, Electrical; Lincoln Town Car, Ford Crown Victoria/Mercury Grand Marquis
FO-643	Undated	Asbestos Action Program; UAW-Ford National Joint Committee on Health & Safety; Hazard Communication Supplement #1
FO-644	1990	1990 Econoline, F-Series, Bronco Truck Shop Manual
FO-645	N/A	Ford - List of Authorized Remanufacturers A History of the Ford Motor Company Archives, With Reflections
FO-646	N/A	on Archival Documentation of Ford of Europe's History
FO-647	6/1/78	Ford Asbestos usage Memo
FO-648	4/1/81	Ford Bogus privilege claim re firewall asbestos
FO-649	11/4/91	Ford Bogus Privilege re asbestos in body of vehicles
FO-650	10/17/89	Ford Bogus Privilege re asbestos in total vehicle B&CE 1989
FO-651	1989	Ford Brakes for 1989
FO-652	8/0/88	Ford Remanufactured brake specifications
FO-653	8/15/62	Polyester Resin Hazards
FO-654	8/0/73	1973 Safety Bulletin re No Blow Out
FO-655	4/4/79	Memo - Johns - Manville Company Meeting, 3-23-79, D.N. McCarthy's Office
FO-656	8/31/79	Memo: Car Engineering Practices - Asbestos Content in Components
FO-657	10/2/79	Letter: Car Engineering Practices Letter Concerning Asbestos Content in New Components
FO-658	10/2/79	Letter: Car Engineering Practices Letter Banning Asbestos
FO-659	10/16/79	Letter: Car Engineering Practices Letter Concerning Asbestos Content in New Components
FO-660	10/31/79	Letter: Car Engineering Practice Letter Concerning Asbestos
FO-661	11/8/79	Letter: Car Engineering Practice Letter Concerning Asbestos
FO-662	12/18/79	Letter: NAAO Car and Truck Engineering Practice Letter
FO-663	5/27/80	Executive Summary: Carcinogens in the Workplace
FO-664	10/14/86	IR Bulletin 4 - Industrial Hygiene
FO-665	7/31/14	Millette Ford Brake Sanding Report
FO-666	8/8/14	Millette Supplemental Report
FO-667	5/23/83	C&M Ford Contract
FO-668	10/24/78	Letter from Diane L. Park M.D. to Joseph A. Califano Handwritten Letter: Sb: Reason for change of tubing approach on
FO-669	6/6/77	D2DP-7934-AA
FO-670	2/21/77	Asbestos Transmission Components Letter: D5AP=7934-AA - 12" Phenolic Reactor to replace PMB-
FO-671	9/10/75	7934-A Aluminum Reactor for C4 - FMX
FO-672	6/8/92	BW 1992 Supply Problems Dna: Heavy Truck Clutch Resourcing/ Long Term Contract
FO-673	N/A	Proposal

Exhibits	Date	Description
FO-674	0/0/92	Note on Replacement Parts
FO-675	10/16/92	Letter: Phase-Out of Asbestos in New Vehicles
FO-676	10/24/83	Letter: Clutch Dust and Use of Freon 11 or 12
FO-677	0/0/89	1989 Warning on Box
FO-678	N/A	Warning Label on Box
FO-679	7/12/79	Letter: Asbestos Content In Dust From Clutch Discs - Detroit Parts Depot
FO-680	6/18/79	Letter from Clayton Environmental Consultants, Inc.
FO-681	10/9/78	Letter: Response to G. Gowan's Request for Material Analysis for Asbestos.
FO-682	11/8/78	Letter: Employee Exposure to Dust During Automatic Boring and Asbestos During Clutch Disc Unpacking.
FO-683	0/0/82	Revised Warnings in Shop Manuals Brakes (Asbestos Cases)
FO-684	8/21/80	Package Material Specifications
FO-685	7/9/80	Letter: Parts Labeling for Asbestos-Containing Clutch Plates
FO-686	3/18/82	Letter: Industrial Hygiene Re-Study - Asbestos Fiber Exposure
FO-687	1/6/83	Letter: Industrial Hygiene Study - Arizona Proving Grounds
FO-688	0/0/1979	Asbestos Substitute Plan
FO-689	0/0/1977	Transmission & Axle Engineering Components Containing Asbestos
FO-690	12/9/83	Letter: Significant Events Report for November 1983
FO-691	9/27/93	Memo: Alternate Lining Material for SN-95 Rear Brake
FO-692	5/0/91	Brake Lining: Passenger Car
FO-693	4/1/91	Memo: Asbestos Lining Alternatives
FO-694	3/12/92	Contact Report: FPSD Non-Asbestos
FO-695	7/23/87	Letter: CARB Asbestos Information Request Asbestos Brake Clutch Data
FO-696	8/9/91	Letter: Products Purchased from FPSD Containing Asbestos
FO-697	3/6/87	Letter: 1987 National Ford Authorized Remanufacturer Recommendations
FO-698	0/0/87	National Ford Authorized Remanufacturer Recommendation
FO-699	5/12/87	Letter: Ford Authorized Remanufacturers
FO-700	5/29/87	Letter: Small Parts Seminar Technical Questions
FO-701	6/17/87	Letter: Announcement of Selected Non-Asbestos Car and Truck Brake Linings
FO-702	4/5/91	Letter: Asbestos Brake Linings
FO-703	10/16/91	Letter: Sale and Promotion of FAR Products
FO-704		Ford Authorized Distributor-to-Dealer Standards
FO-705	3/31/98	FCSD Technical Training Interactive Study Guide: General Brake Theory and Operation
FO-706	11/00/03	Motorcraft: Advanced Brake Service and Brake Lathe Training, Student Guide

Exhibits	Date	Description
FO-707	2/8/05	Ford Motor Company Advocates CCAR's "S/P2" Training to Ford and Lincoln-Mercury Dealers
FO-708	2/23/05	Ford Motor Company, Material Safety Data Sheet, Asbestos
FO-709	1/00/06	Advanced Brake Systems Diagnosis and Service, Student Guide
FO-710	6/19/06	Webpages for S/P2 Online University
FO-711		Article, Preventing Asbestos Disease Among Auto Mechanics
FO-712		Webpage with quotes from various auto industry leaders
FO-713	1/00/06	Brake System Diagnosis and Repair, Student Guide
FO-714	3/00/07	EPA Article: Current Best Practices For Preventing Asbestos Exposure Among Brake and Clutch Repair Workers
FO-715		Photograph of a mechanic blowing out brake dust Drum and Disc Brakes, Key Points to: Diagnose and Repair Brake Systems
FO-716	00/00/74-76	
FO-717	10/14/86	Industrial Relations Bulletin, Industrial Hygiene - Asbestos
FO-718	6/17/77	Ford Motor Company Meeting Minutes
FO-719	7/23/75	Johns-Manville Internal Correspondence from George W. Wright to Paul Kotkin
FO-720	10/15/71	Dr. F.L. Pundsack: Presentation to Illinois Pollution Control Board
FO-721	3/19/76	Department of Health, Education, and Welfare, CDC, NIOSH. Minutes of Meeting on Occupational Exposure to Asbestos Dust During Brake and Clutch Servicing. Cincinnati, Ohio March 19, 1976 Minutes.
FO-722	2/2/72	Johns-Manville Letter from W.P. O'Reilly to R.E. Gealer
FO-723	7/10/75	Meeting to Discuss Health Problems Among Brake Lining Workers Agenda
FO-724	9/20/83	Ford Inter Office Memo from H.B. Lick to Souren Keoleian
FO-725	6/18/15	All exhibits to the Deposition of Mark Garavaglia dated June 18, 2015
FO-726	6/17/15	All exhibits to the Deposition of Dr. Dennis Paustenbach dated June 17, 2015, In re: All Asbestos Litigation filed by Maune, Raichle, Hartley French & Mudd, LLC
FO-727	6/17/15	All exhibits to the Deposition of Dr. Dennis Paustenbach dated June 17, 2015, Yates v. Ford Motor Company, et al.
FO-728	8/28/14	All exhibits to the Deposition of Richard Lee Schlenker, Jr. dated August 28, 2014
FO-729	8/28/14	All exhibits to the Deposition of Patrick Sheehan dated August 28, 2014
FO-730	00/00/85	Mineral Facts and Problems 1985 Edition
FO-731	5/8/14	Fyie in Koepke, 2014 Exhibit 1
FO-732	4/2/14	Fyie in Koepke, 2014 Exhibit 2

Exhibits	Date	Description
FO-733	11/25/91	Fyie in Koepke, 2014 Exhibit 3, Modified Vehicle Engineering Bulletin No. C-10, Change Control Procedure/Change Request Form
FO-734	11/19/71	Fyie in Koepke, 2014 Exhibit 4, Ford Intra Company Memo: Fibrous Asbestos Emissions
FO-735	6/2/75	Fyie in Koepke, 2014 Exhibit 5, Letter from D.L. Block to Paul Korta
FO-736	5/8/14	Fyie in Koepke, 2014 Exhibit 6, List of Ford Vehicles sold to Hertz in California from 1979-1999
FO-737	5/8/14	Fyie in Koepke, 2014 Exhibit 7, Photograph of a CD containing FMC Documents produced in the case
FO-738	2/20/87	Fyie in Koepke, 2014 Exhibit 8, Ford Inter Office Memo: Exposure of Brake Mechanics to Asbestos Fibers
FO-739	5/8/14	Fyie in Koepke, 2014 Exhibit 9, Photograph of a Ford General Brakes Theory and Operation DVD
FO-740	5/8/14	Fyie in Koepke, 2014 Exhibit 10, Ford Brake Systems General Brake Theory and Operation reference book
FO-741	5/8/14	Fyie in Koepke, 2014 Exhibit 11, Highlighted list of company asbestos components
FO-742	10/22/88	Fyie in Koepke, 2014 Exhibit 12, Material Safety Data Sheet for Asbestos Products
FO-743	9/00/74	Fyie in Koepke, 2014 Exhibit 13, MVMA Specifications Form: Passenger Car, Model Year 1975
FO-744	9/00/75	Fyie in Koepke, 2014 Exhibit 14, MVMA Specifications Form: Passenger Car, Model Year: 1976
FO-745	9/00/76	Fyie in Koepke, 2014 Exhibit 15, MVMA Specifications Form: Passenger Car, Model Year: 1977
FO-746	9/00/77	Fyie in Koepke, 2014 Exhibit 16, MVMA Specifications Form: Passenger Car, Model Year: 1978
FO-747	9/00/78	Fyie in Koepke, 2014 Exhibit 17, MVMA Specifications Form: Passenger Car, Model Year: 1979
FO-748	9/00/79	Fyie in Koepke, 2014 Exhibit 18, MVMA Specifications Form: Passenger Car, Model Year: 1980
FO-749	9/00/80	Fyie in Koepke, 2014 Exhibit 19, MVMA Specifications Form: Passenger Car, Model Year: 1981
FO-750	9/00/81	Fyie in Koepke, 2014 Exhibit 20, MVMA Specifications Form: Passenger Car, Model Year: 1982
FO-751	9/00/85	Fyie in Koepke, 2014 Exhibit 21, MVMA Specifications Form: Passenger Car, Model Year: 1986
FO-752	4/00/88	Fyie in Koepke, 2014 Exhibit 22, MVMA Specifications Form: Passenger Car, Model Year: 1987

Exhibits	Date	Description
FO-753	5/00/87	Fyie in Koepke, 2014 Exhibit 23, MVMA Specifications Form: Passenger Car, Model Year: 1988
FO-754	2/00/88	Fyie in Koepke, 2014 Exhibit 24, MVMA Specifications Form: 1989 Crown Victoria
FO-755	11/00/88	Fyie in Koepke, 2014 Exhibit 25, MVMA Specifications Form: 1990 Crown Victoria
FO-756	11/1/89	Fyie in Koepke, 2014 Exhibit 26, MVMA Specifications Form: 1991 Crown Victoria
FO-757	7/2/90	Fyie in Koepke, 2014 Exhibit 27, MVMA Specifications Form: 1992 Crown Victoria
FO-758	6/15/92	Fyie in Koepke, 2014 Exhibit 28, MVMA Specifications Form: 1993 Crown Victoria
FO-759	5/14/93	Fyie in Koepke, 2014 Exhibit 29, MVMA Specifications Form: 1994 Crown Victoria
FO-760	7/1/94	Fyie in Koepke, 2014 Exhibit 30, MVMA Specifications Form: 1995 Crown Victoria
FO-761	8/25/95	Fyie in Koepke, 2014 Exhibit 31, MVMA Specifications Form: 1996 Crown Victoria
FO-762	9/00/96	Fyie in Koepke, 2014 Exhibit 32, MVMA Specifications Form: 1997 Crown Victoria
FO-763	9/00/97	Fyie in Koepke, 2014 Exhibit 33, MVMA Specifications Form: 1998 Crown Victoria
FO-764	11/00/98	Fyie in Koepke, 2014 Exhibit 34, MVMA Specifications Form: 1999 Crown Victoria
FO-765	11/00/99	Fyie in Koepke, 2014 Exhibit 35, MVMA Specifications Form: 2000 Crown Victoria
FO-766	10/00/76	Fyie in Koepke, 2014 Exhibit 36, MVMA Specifications Form: 1977 LTD II
FO-767	9/00/70	Fyie in Koepke, 2014 Exhibit 37, AMA Specifications Form: 1971 Custom-Galaxie-LTD
FO-768	11/00/73	Fyie in Koepke, 2014 Exhibit 38, MVMA Specifications Form, Passenger Car: 1974 Gran Torino Elite
FO-769	9/00/74	Fyie in Koepke, 2014 Exhibit 39, MVMA Specifications Form, Passenger Car: 1975 Granada
FO-770	7/00/77	Fyie in Koepke, 2014 Exhibit 40, MVMA Specifications Form, Passenger Car: 1978 Fiesta
FO-771	9/00/80	Fyie in Koepke, 2014 Exhibit 41, MVMA Specifications Form, Passenger Car: 1981 Escort
FO-772	9/00/81	Fyie in Koepke, 2014 Exhibit 42, MVMA Specifications Form, Passenger Car: 1982 EXP
FO-773	9/00/77	Fyie in Koepke, 2014 Exhibit 43, MVMA Specifications Form, Passenger Car: 1978 Fairmont

Exhibits	Date	Description
FO-774	5/00/83	Fyie in Koepke, 2014 Exhibit 44, MVMA Specifications Form, Passenger Car: 1984 Tempo
FO-775	9/00/70	Fyie in Koepke, 2014 Exhibit 45, AMA Specifications Form, Passenger Car: 1971 Maverick
FO-776	9/00/70	Fyie in Koepke, 2014 Exhibit 46, AMA Specifications Form, Passenger Car: 1971 Pinto
FO-777	11/00/86	Fyie in Koepke, 2014 Exhibit 47, MVMA Specifications Form, Passenger Car: 1986 Taurus
FO-778	9/00/70	Fyie in Koepke, 2014 Exhibit 48, AMA Specifications Form, Passenger Car: 1971 Torino
FO-779	10/00/87	Fyie in Koepke, 2014 Exhibit 49, MVMA Specifications Form: 1989 Probe
FO-780	9/00/69	Fyie in Koepke, 2014 Exhibit 50, AMA Specifications Form, Passenger Car: 1970 Mustang
FO-781	9/00/73	Fyie in Koepke, 2014 Exhibit 51, MVMA Specifications Form, Passenger Car: 1974 Mustang II
FO-782	9/00/70	Fyie in Koepke, 2014 Exhibit 52, AMA Specifications Form, Passenger Car: 1971 Torino
FO-783	9/00/70	Fyie in Koepke, 2014 Exhibit 53, AMA Specifications Form, Passenger Car: 1971 Thunderbird
FO-784	9/00/80	Fyie in Koepke, 2014 Exhibit 54, MVMA Specifications Form, Passenger Car: 1981 Thunderbird
FO-785	11/1/89	Fyie in Koepke, 2014 Exhibit 55, MVMA Specifications Form: 1991 Thunderbird
FO-786	6/15/92	Fyie in Koepke, 2014 Exhibit 56, MVMA Specifications Form: 1993 Thunderbird
FO-787	9/00/70	Fyie in Koepke, 2014 Exhibit 57, AMA Specifications Form, Passenger Car: 1971 Lincoln
FO-788	9/00/81	Fyie in Koepke, 2014 Exhibit 58, MVMA Specifications Form, Passenger Car: 1982 Continental
FO-789	9/00/70	Fyie in Koepke, 2014 Exhibit 59, AMA Specifications Form, Passenger Car: 1971 Mark III
FO-790	9/00/71	Fyie in Koepke, 2014 Exhibit 60, AMA Specifications Form, Passenger Car: 1972 Mark IV
FO-791	9/00/76	Fyie in Koepke, 2014 Exhibit 61, MVMA Specifications Form, Passenger Car: 1977 Mark V
FO-792	9/00/79	Fyie in Koepke, 2014 Exhibit 62, MVMA Specifications Form, Passenger Car: 1980 Mark VI
FO-793	11/00/83	Fyie in Koepke, 2014 Exhibit 63, MVMA Specifications Form, Passenger Car: 1984 Mark VII
FO-794	9/00/83	Fyie in Koepke, 2014 Exhibit 64, MVMA Specifications Form, Passenger Car: 1984 Lincoln Town Car

Exhibits	Date	Description
FO-795	4/00/77	Fyie in Koepke, 2014 Exhibit 65, MVMA Specifications Form, Passenger Car: 1977-1/2 Lincoln Versailles
FO-796	12/20/82	Fyie in Koepke, 2014 Exhibit 66, Ford Motor Company, Brake Assembly and Lining Suppliers
FO-797	2/6/78	Fyie in Koepke, 2014 Exhibit 67, Ford Inter Office Memo, Federal Trade Commission Request for Brake Sourcing Information
FO-798	5/21/14	Fyie in Koepke, 2014 Exhibit 68, Records of concerns about different Ford parts
FO-799	5/21/14	Fyie in Koepke, 2014 Exhibit 69, Records of concerns about different Ford parts
FO-800	5/21/14	Fyie in Koepke, 2014 Exhibit 70, Records of concerns about different Ford parts
FO-801	12/00/12	Fyie in Koepke, 2014 Exhibit 71, Ford Asbestos Friction Collection, Document Index
FO-802	12/00/12	Fyie in Koepke, 2014 Exhibit 72, Ford Motor Company Asbestos Privilege Log
FO-803	5/21/14	Fyie in Koepke, 2014 Exhibit 73, Photograph of Ford brake pads
FO-804	9/1/71	Fyie in Koepke, 2014 Exhibit 74, Ford Motor Company Invoice for brake parts from Borg Warner
FO-805	9/16/66	Fyie in Koepke, 2014 Exhibit 75, Ford Letter from B.D. Mills to A.A. Krueger of Borg-Warner Corporation
FO-806	8/28/67	Fyie in Koepke, 2014 Exhibit 76, Borg Warner letter from John W. Butcher to E. Ehling
FO-807	5/21/14	Fyie in Koepke, 2014 Exhibit 77, Prices of Clutch Disc Assemblies and Clutch Pressure Plate and Cover Assemblies (September 16, 1966)
FO-808	5/21/14	Fyie in Koepke, 2014 Exhibit 78, Borg-Warner invoice, almost impossible to read
FO-809	5/21/14	Fyie in Koepke, 2014 Exhibit 79, Photograph of a box of Ford parts
FO-810	5/21/14	Fyie in Koepke, 2014 Exhibit 80, Photograph of shipping information attached to a package
FO-811	5/21/14	Fyie in Koepke, 2014 Exhibit 81, Photograph of an empty Ford parts box
FO-812	5/21/14	Fyie in Koepke, 2014 Exhibit 82, Photograph of a warning attached to a Ford part containing asbestos
FO-813	5/21/14	Fyie in Koepke, 2014 Exhibit 83
FO-814	8/20/90	Fyie in Koepke, 2014 Exhibit 84, Notes from Larry Allen and William J. Naples regarding asbestos specifications
FO-815	8/1/90	Fyie in Koepke, 2014 Exhibit 85, Letter from Barry F. Dougherty to George Mimikos
FO-816	5/21/14	Fyie in Koepke, 2014 Exhibit 86

Exhibits	Date	Description
FO-817	5/21/14	Fyie in Koepke, 2014 Exhibit 87
FO-818	5/21/14	Fyie in Koepke, 2014 Exhibit 88, Notice on handling asbestos and when asbestos can be used
FO-819	02/00/02	Fyie in Koepke, 2014 Exhibit 89, email correspondence between Jim Brown and Geoff Summers
FO-820	02/00/02	Fyie in Koepke, 2014 Exhibit 90, email correspondence between Joel Brick and Sherri L. Rogin
FO-821	8/21/80	Fyie in Koepke, 2014 Exhibit 91, Package Material Specifications with asbestos warning label
FO-822	5/21/14	Fyie in Koepke, 2014 Exhibit 92, Photograph of a CD containing engineering drawings
FO-823	5/21/14	Fyie in Koepke, 2014 Exhibit 93, Photograph of a CD containing GPAS Documents
FO-824	5/21/14	Fyie in Koepke, 2014 Exhibit 94, Technical drawings for the Mercury Comet, 71, 73, 75
FO-825	5/21/14	Fyie in Koepke, 2014 Exhibit 95, Technical drawings
FO-826	5/21/14	Fyie in Koepke, 2014 Exhibit 96, Technical drawings
FO-827	5/21/14	Fyie in Koepke, 2014 Exhibit 97, Technical drawings for the Mustang 1965 and 1984
FO-828	5/21/14	Fyie in Koepke, 2014 Exhibit 98, Technical drawings for the Mustang 1966
FO-829	5/21/14	Fyie in Koepke, 2014 Exhibit 99, Technical drawings for the Mustang 1967
FO-830	5/21/14	Fyie in Koepke, 2014 Exhibit 100, Technical drawings
FO-831	5/21/14	Fyie in Koepke, 2014 Exhibit 101, Technical drawings for the Lincoln Mark III 1971
FO-832	5/21/14	Fyie in Koepke, 2014 Exhibit 102, Technical drawings for the Mercury Bobcat 1974
FO-833	5/21/14	Fyie in Koepke, 2014 Exhibit 103, Technical drawings for the Mustang II 1978
FO-834	5/21/14	Fyie in Koepke, 2014 Exhibit 104, Technical drawings for the Capri 1986
FO-835	5/21/14	Fyie in Koepke, 2014 Exhibit 105, Technical drawings for the Lynx 1986
FO-836	5/21/14	Fyie in Koepke, 2014 Exhibit 106, Technical drawings for the Marquis 1986
FO-837	5/21/14	Fyie in Koepke, 2014 Exhibit 107, Technical drawings for the Sable 1986
FO-838	5/21/14	Fyie in Koepke, 2014 Exhibit 108, Technical drawings for the Topaz 1986
FO-839	5/21/14	Fyie in Koepke, 2014 Exhibit 109, Technical drawings for the Lincoln Continental 70, 72, 74

Exhibits	Date	Description
FO-840	5/21/14	Fyie in Koepke, 2014 Exhibit 110, Technical drawings for the Lincoln Mark IV 72, 73, 75
FO-841	5/21/14	Fyie in Koepke, 2014 Exhibit 111, Photograph of Ford D9AZ - 2001 Shoe & Lining Kit
FO-842	5/21/14	Fyie in Koepke, 2014 Exhibit 112, Asbestos warning label
FO-843	5/21/14	Fyie in Koepke, 2014 Exhibit 113, Asbestos warning label
FO-844	5/21/14	Fyie in Koepke, 2014 Exhibit 114, Photograph of a box of brake shoes
FO-845	5/21/14	Fyie in Koepke, 2014 Exhibit 115, Photograph of a box of Ford parts
FO-846	7/27/72	Fyie in Koepke, 2014 Exhibit 116, Article, Brake lining dust linked to cancer
FO-847	9/6/72	Fyie in Koepke, 2014 Exhibit 117, Ford Intra Company Memo: Carcinogenic Effect of Asbestos -- Wayne State University Animal Experiments
FO-848	00/00/80	Fyie in Koepke, 2014 Exhibit 118, Ford Light Truck Shop Manual, Body, Chassis, Electrical, 1980
FO-849	00/00/81	Fyie in Koepke, 2014 Exhibit 119, 1981 Car Shop Manual, Escort, Lynx, Body, Chassis, Electrical
FO-850	9/00/72	Fyie in Koepke, 2014 Exhibit 120, AMA Specifications Form, Passenger Car: 1973 Cougar
FO-851	9/00/70	Fyie in Koepke, 2014 Exhibit 121, AMA Specifications Form, Passenger Car: 1971 Cougar
FO-852	9/00/71	Fyie in Koepke, 2014 Exhibit 122, AMA Specifications Form, Passenger Car: 1972 Cougar
FO-853	10/00/76	Fyie in Koepke, 2014 Exhibit 123, MVMA Specifications Form, Passenger Car: 1977 Cougar
FO-854	9/00/77	Fyie in Koepke, 2014 Exhibit 124, MVMA Specifications Form, Passenger Car: 1978 Cougar
FO-855	9/00/78	Fyie in Koepke, 2014 Exhibit 125, MVMA Specifications Form, Passenger Car: 1979 Cougar
FO-856	9/00/79	Fyie in Koepke, 2014 Exhibit 126, MVMA Specifications Form, Passenger Car: 1980 Cougar XR-7
FO-857	9/00/80	Fyie in Koepke, 2014 Exhibit 127, MVMA Specifications Form, Passenger Car: 1981 Cougar
FO-858	9/00/81	Fyie in Koepke, 2014 Exhibit 128, MVMA Specifications Form, Passenger Car: 1982 Cougar
FO-859	9/00/83	Fyie in Koepke, 2014 Exhibit 129, MVMA Specifications Form, Passenger Car: 1984 Cougar
FO-860	9/00/85	Fyie in Koepke, 2014 Exhibit 130, MVMA Specifications Form, Passenger Car: 1986 Cougar

Exhibits	Date	Description
FO-861	4/00/86	Fyie in Koepke, 2014 Exhibit 131, MVMA Specifications Form, Passenger Car: 1987 Cougar
FO-862	9/00/70	Fyie in Koepke, 2014 Exhibit 132, AMA Specifications Form, Passenger Car: 1971 Comet
FO-863	9/00/70	Fyie in Koepke, 2014 Exhibit 133, AMA Specifications Form, Passenger Car: 1971 Mercury Colony Park
FO-864	1/00/75	Fyie in Koepke, 2014 Exhibit 134, MVMA Specifications Form, Passenger Car: 1975 1/2 Bobcat
FO-865	12/15/70	Fyie in Koepke, 2014 Exhibit 135, IMPA Specifications Imported Passenger Cars: Capri and Capri II
FO-866	12/15/70	Fyie in Koepke, 2014 Exhibit 136, IMPA Specifications Imported Passenger Cars: 1971 Capri
FO-867	9/00/78	Fyie in Koepke, 2014 Exhibit 137, MVMA Specifications Form, Passenger Car: 1979 Capri
FO-868	1/00/75	Fyie in Koepke, 2014 Exhibit 138, MVMA Specifications Form, Passenger Car: 1975 1/2 Bobcat
FO-869	4/1/81	Fyie in Koepke, 2014 Exhibit 139, MVMA Specifications Form, Passenger Car: 1982 Mercury LN 7
FO-870	2/00/88	Fyie in Koepke, 2014 Exhibit 140, MVMA Specifications Form: 1989 Grand Marquis
FO-871	10/00/82	Fyie in Koepke, 2014 Exhibit 141, MVMA Specifications Form: Passenger Car: 1983 Marquis
FO-872	9/00/80	Fyie in Koepke, 2014 Exhibit 142, MVMA Specifications Form, Passenger Car: 1981 Lynx
FO-873	9/00/74	Fyie in Koepke, 2014 Exhibit 143, MVMA Specifications Form, Passenger Car: 1975 Monarch
FO-874	1/00/85	Fyie in Koepke, 2014 Exhibit 144, MVMA Specifications Form, Passenger Car: 1985 Merkur XR4Ti
FO-875	10/00/71	Fyie in Koepke, 2014 Exhibit 145, AMA Specifications Form, Passenger Car: 1972 Montego
FO-876	11/00/85	Fyie in Koepke, 2014 Exhibit 146, MVMA Specifications Form, Passenger Car: 1986 Sable
FO-877	5/00/83	Fyie in Koepke, 2014 Exhibit 147, MVMA Specifications Form, Passenger Car: 1984 Topaz
FO-878	11/00/86	Fyie in Koepke, 2014 Exhibit 148, MVMA Specifications Form: 1988 Mercury Tracer
FO-879	9/00/77	Fyie in Koepke, 2014 Exhibit 149, MVMA Specifications Form, Passenger Car: 1978 Zephyr
FO-880	9/00/70	Fyie in Koepke, 2014 Exhibit 150, AMA Specifications Form, Passenger Car: 1971 Ford Custom Galaxie LTD Wagon
FO-881	9/00/70	Fyie in Koepke, 2014 Exhibit 151, AMA Specifications Form, Passenger Car: 1971 Comet

Exhibits	Date	Description
FO-882	5/14/64	Fyie in Koepke, 2014 Exhibit 152, General Product Acceptance Specification, System: Complete Vehicle
FO-883	9/5/75	Fyie in Koepke, 2014 Exhibit 153, General Product Acceptance Specification, System: Complete Vehicle
FO-884	8/26/75	Fyie in Koepke, 2014 Exhibit 154, General Product Acceptance Specification, System: Complete Vehicle
FO-885	2/12/02	Fyie in Koepke, 2014 Exhibit 155, email from Arne Anderson to Elizabeth Lu concerning drum brakes
FO-886	12/17/01	Fyie in Koepke, 2014 Exhibit 156, email from Elizabeth Lu to Arne Anderson
FO-887	6/24/02	Fyie in Koepke, 2014 Exhibit 157, email from Elizabeth Lu to Arne Anderson concerning the banning of asbestos in brake linings
FO-888	5/8/14	Fyie in Koepke, 2014 Exhibit A
FO-889	10/24/75	Fyie in Koepke, 2014 Exhibit B, Technical Service Bulletin. Bulletin Number 99
FO-890	8/00/79	Fyie in Koepke, 2014 Exhibit C, Light Truck Shop Manual: Body, Chassis, Electrical, 1980
FO-891	8/21/80	Fyie in Koepke, 2014 Exhibit D, Package Material Specifications
FO-892	09/00/84	Fyie in Koepke, 2014 Exhibit E, Excerpt from a brake service manual
FO-893	00/00/85	Fyie in Koepke, 2014 Exhibit F, 1985 Car Shop Manual: Body, Chassis, Electrical. Tempo/Topaz, Escort/Lynx, EXP
FO-894	5/21/14	Fyie in Koepke, 2014 Exhibit G, Photograph of Ford parts with a warning label
FO-895	5/21/14	Fyie in Koepke, 2014 Exhibit H, Photograph of Ford parts with a warning label
FO-896	5/21/14	Fyie in Koepke, 2014 Exhibit I, Photograph of Ford parts box
FO-897	8/12/05	State of Florida, In the Circuit Court of the 11th Judicial Circuit in and for Dade County, Florida
FO-898	11/12/91	Memo from R.Summer to C. Pedder Dated November 12, 1991. Subject: Asbestos Labeling
FO-899	1/11/73	Ford Inter Office Memo from G.F. Bush to R. Birdsall et.al. Subject: Asbestos-Containing Materials - Status Report to this Date
FO-900	9/9/70	Ford Intra Company Memo from W.H. Willeke to P.E. Toth. Subject: Industrial Hygiene Product Opinion
FO-901	8/23/72	Ford Inter Office Communication from G.F. Bush re: Potential Future Status of Asbestos-Containing Materials
FO-902	3/15/68	Ford Engineering Material Specifications
FO-903	6/6/77	Memo to D. Taggart, Subject: Reasons for change of tooling approach on D2DP-7934-AA Phenolic Reactor-10 1/4"

Exhibits	Date	Description
FO-904	00/00/77	Ford Asbestos Usage Memo
FO-905	11/3/78	Ford Engineering Material Specifications
FO-906	9/12/06	Ford Material Safety Data Sheet
FO-907	Various	Ford Memos concerning phenolic molding
FO-908	7/18/78	Memo from M. Weiss to D. Breen re: ABC Television Special on Asbestosis