

1 UNITED STATES DISTRICT COURT  
2 FOR THE DISTRICT OF COLORADO

3 FRANK C. TETI AND KAYE L. \*  
4 TETI, INDIVIDUALLY, AND AS \*  
5 NEXT FRIENDS, GUARDIANS AND \*  
6 NATURAL PARENTS OF JASON \*  
7 TETI \*  
8 Plaintiffs, \*

9 VS. \*

CIVIL ACTION NO. 91-1011

10 FORD MOTOR COMPANY \*  
11 Defendant. \*

12 VOLUME I of II

13 'VIDEOTAPED DEPOSITION OF JOHN LEINONEN

14 was taken pursuant to notice and the stipulations contained  
15 herein, before Michael J. Domingue, a Court Reporter and  
16 Notary Public in and for the State of Texas, on the 29th  
17 day of October, 1991, commencing at 9:15 a.m., at the  
18 Hyatt Regency, Dearborn, Michigan.

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25  
Plaintiff's Exhibit

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1 discussions.

2 MR. COOK: Certify the question in regard to  
3 my cases, please.

4 MR. TURNER: Mine, too.

5  
6 QUESTIONS BY MR. TURNER:

7 Q. Did you have any conversations with anyone other than  
8 the Office of General Counsel concerning the  
9 collection of Bronco II documents?

10 A. Like I say is that the Office of General Counsel was  
11 intimately involved. And we were doing it at the  
12 request of the Office of General Counsel. And as a --  
13 as a part and parcel of that, whether -- I -- I would  
14 think therefore that what we were doing basically was --  
15 was for the Office of General Counsel. But whether --  
16 I -- I think it would probably be realistic to -- to  
17 guess that there were conversations surrounding that --  
18 that request with others. But I can't be -- I don't  
19 know what they were.

20 Q. Well, I don't want to step on Mr. Marcum's toes or  
21 infringe upon something that is claimed as  
22 attorney-client privilege. But to be quite honest  
23 with you, I'm not sure I understood your answer. Are  
24 you saying that you might have you just don't know or  
25 you did or you did not?