

In The Matter Of:

Fisico -vs- Ford Motor Company, et al.

Frederic N. Parrill

January 14, 1993

Patricia Murray & Associates

"The Difference we make ... makes all the Difference"

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Original File SP4231A.ASC, 112 Pages

Word Index included with this Min-U-Script®

Plaintiff's Exhibit

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(1) correct?

(2) A: If there was such a report, yeah, I would think so.

(3) Q: Mr. Antoun would have had a copy, correct?

(4) A: Right.

(5) Q: Mr. Drotar would have had a copy?

(6) A: Probably.

(7) Q: And if your documents were preserved, Mr. Antoun's (8) documents were preserved, Mr. Drotar's documents (9) were preserved, then we would still have a copy of (10) that document, wouldn't we?

(11) A: If there ever were such a document. That's what I (12) said earlier; I don't know how it was paraphrased (13) on this list. It's very possible that the document (14) in fact does exist but simply can't be reconciled or (15) tied to this description. I don't know.

(16) Q: Mr. Parrill, let me tell you that Ford has told us (17) they cannot find a document that deals with a 2.2 (18) stability index.

(19) Do you understand that to be the case?

(20) A: I don't have any basis to disagree with it.

(21) Q: The fact is every document on Mr. Pittman's list (22) that was destroyed relates to track, ride height or (23) stability index in one way or another, isn't that (24) true?

(25) A: I don't have a basis to disagree.

(1) Q: In fact, the program — or proposals to widen the (2) track two inches to make the Bronco II more stable (3) went so far that there was a program change request (4) — or a product change request prepared, wasn't (5) there?

(6) A: I couldn't say for sure one way or the other. Could (7) very well have been.

(8) Q: Well, if there was a product change request prepared (9) in order to widen the track two inches to make (10) the vehicle more stable, you would have known about (11) that?

(12) A: Not necessarily. A product change request is a (13) detailed document and may or may not have signatures (14) of program direction. Could be issued, for (15) instance, to obtain information as part of an (16) investigation.

(17) Q: A program change request is — or a product change (18) request is a specific form used at Ford, isn't it?

(19) A: Correct.

(20) Q: And it has sections where a good number of people (21) have to sign off on that program change request?

(22) A: If it's conveying direction to make a change, yes.

(23) Q: And one of the documents that was in Mr. Pittman's (24) file which was destroyed was a program change (25) request dealing with increasing the front axle tread

(1) width, correct?

(2) Let me ask you to look at the last item on (3) his list.

(4) A: By description of the document, yes, that's correct.

(5) Q: And a program — or a product change request is not (6) a document of which there is only one copy, is it?

(7) A: No, there's many copies.

(8) Q: Many copies. And if there are no longer any copies (9) of the program change request that we see in (10) Mr. Pittman's list, then we know that not only was (11) Mr. Pittman's copy destroyed, but every other copy (12) that existed was also destroyed, isn't that true?

(13) A: Over the course of time I presume that was the case, (14) yes.

(15) Q: And if there was a copy in your files, we know that (16) that copy was destroyed?

(17) A: It's highly unlikely I would have had a copy of a (18) PCR in my files, but yes.

(19) Q: If there was a copy in Mr. Drotar's files, we know (20) that was destroyed?

(21) A: Wasn't found and retained, yes.

(22) Q: If there was a copy in Mr. Antoun's files we know (23) that copy was destroyed?

(24) A: Wasn't found and maintained, yes.

(25) Q: If there was a copy at the Automotive Safety Office,

(1) Mr. Leinonen's files, we know that copy was (2) destroyed?

(3) A: If there was.

(4) Q: In fact, Mr. Leinonen never responded to your memo, (5) did he?

(6) A: I don't have a recollection, as I would think about (7) it — he was not one of the respondents at the point (8) in time that we were discussing earlier, when I (9) delineated who had responded at that point in time, (10) and I don't remember ever getting anything (11) specifically.

(12) Q: We don't have any memo from Mr. Leinonen here, do (13) we? We don't have — do we?

(14) A: That's correct.

(15) Q: We don't have any list from Mr. Leinonen?

(16) A: Right.

(17) Q: The Automotive Safety Office would have had some (18) documents relating to Bronco II stability and (19) handling, wouldn't it?

(20) A: Of peripheral interest at least.

(21) Q: Well, let me ask you to look at Exhibit 153, the (22) program methodology. Do you see that?

(23) A: Yes.

(24) Q: And we see that quite a number of the items for (25) which documents are to be collected have the

(1) notation ASO after them. Do you see that?

(2) A: Correct.

(3) Q: And you previously told us that means that that's (4) probably where one would expect to find those (5) documents?