

IN THE COUNT COURT
OF NUECES COUNTY, TEXAS
IN THE COUNTY COURT AT LAW NO. 1

RAUL SEGOVIA, INDIVIDUALLY, §
FOR AND ON BEHALF OF ALL THOSE §
ENTITLED TO RECOVER FOR THE DEATH §
OF CONSUELO SEGOVIA UNDER THE TEXAS §
WRONGFUL DEATH AND SURVIVAL ACTS §
AND IRMA SEGOVIA §

Plaintiff §

VS. §

FORD MOTOR COMPANY AND HELEN §
GUZMAN §

Defendant §

HELEN GUZMAN, INDIVIDUALLY §

Cross-Claimant §

VS. §

FORD MOTOR COMPANY §

Defendant §

ERASMO GUZMAN, INDIVIDUALLY §

Intervenor §

VS. §

FORD MOTOR COMPANY §'S

CAUSE NO. 2011-CCV-60227-1

**FORD MOTOR COMPANY'S AMENDED RESPONSES TO INTERVENOR SUSAN
GUZMAN'S FIRST SET OF INTERROGATORIES AND
REQUESTS FOR PRODUCTION**

NOW COMES Defendant Ford Motor Company ("Ford") and submits its Amended Responses to Intervenor Susan Guzman's First Set of Interrogatories and Requests for Production.

AMENDED ANSWER:

Ford states that it will provide the total fees, costs and disbursements paid by Ford to Exponent, Inc. from January 1, 1999 to December 31, 2011. With that understanding, Ford states that from January 1, 1999 until December 31, 2011, Ford's Office of the General Counsel paid Exponent, Inc. \$106,235,737.00 for fees, costs and disbursements. As Ford does not have records indicating the amount paid for any one individual within a firm for Ford-related work, this represents the fees, costs and disbursements associated with all the firm's work on Ford's behalf.

INTERROGATORY NO. 6:

Please state the amount of money paid for services provided in support of litigation by attorneys representing Ford Motor Company to Jeffrey J. Croteau this includes but is not limited to "general consulting fees" as well as "litigation support fees" from 1999 to the present.

ANSWER:

Ford states that it will provide the total fees, costs and disbursements paid by Ford to Exponent, Inc. from January 1, 2002 to December 31, 2011. With that understanding, Ford states that from January 1, 2002 until December 31, 2011, Ford's Office of the General Counsel paid Exponent, Inc. \$85,803,647.00 for fees, costs and disbursements. As Ford does not have records indicating the amount paid for any one individual within a firm for Ford-related work, this represents the fees, costs and disbursements associated with all the firm's work on Ford's behalf.

Beyond this, Ford objects to this Interrogatory as it is overly broad and seeks information that is irrelevant and not reasonably calculated to lead to the discovery of admissible evidence as