

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT, CHANCERY DIVISION

LARRY ECK, TIM WRIGHT, KNUTE
AXELSON, ROBERT VACHALEK,
JONATHAN CASE, and TYE KEPPLER,

Plaintiffs,

v.

FORD MOTOR COMPANY,

Defendant.

No. 02 CH 22086

**DEFENDANT FORD MOTOR COMPANY'S REQUEST FOR PRODUCTION OF
VEHICLE FOR INSPECTION TO NAMED PLAINTIFF TIM WRIGHT**

To: Curtis C. Warner, Edelman, Combs, Lattuner & Goodwin, LLC, Attorney
for TIM WRIGHT, 18th Floor, 120 South LaSalle Street, Chicago, IL 60603:

Pursuant to Supreme Court Rule 214, Defendant Ford Motor Company ("Ford"), by O'Melveny & Myers LLP, its attorneys, makes this demand upon Tim Wright and Curtis C. Warner, Edelman, Combs, Lattuner & Goodwin, LLC, his attorney, to produce any and all Ford Taurus SHO automobiles, V8 SHO engines and V8 SHO engine components within Tim Wright's possession, custody or control, and on the basis of which Tim Wright asserts any claims in the above-captioned action, for inspection by Ford's designated representatives. Ford further requests that Tim Wright produce any and all parts or equipment which have, at any point in time, been attached to or removed from above referenced vehicle(s) or engine(s) which are within Tim Wright's possession, custody or control.

The above-referenced things shall be presented by plaintiff for inspection by Ford's

designated representatives at Kenny Ross Ford, 3200 Library Road, Pittsburgh, PA 15234, on August 15, 2005, at 12:00 p.m. or other mutually agreed upon time.

Dated: August 5, 2005

O'MELVENY & MYERS LLP

By:  _____

Michael E. Stamp
Attorneys for Defendant
FORD MOTOR COMPANY