

Request 4

Produce copies of all documents related to each item within the scope of Request No. 2. Organize the documents separately by category (i.e., consumer complaints, field reports, etc.) and describe the method Ford used for organizing the documents. Describe in detail the search methods and search criteria used by Ford to identify the items in response to Request No. 2.

Answer

Relevant owner and field report information was previously provided in the response to Request 3. To the extent information sought in Request 4 is available for lawsuits and claims, it is provided in the file "EA23-002 Request 4 – Lawsuits and Claims Data."

Detailed descriptions of the search methods and criteria, including all pertinent parameters, used to identify the items provided in response to Request 2 are described in the file "EA23-002 Request 4 – Search Criteria."