

EXHIBIT 7

0001
 1 UNITED STATES DISTRICT COURT
 2 SOUTHERN DISTRICT OF INDIANA
 3 INDIANAPOLIS DIVISION
 4 In re BRIDGESTONE/FIRESTONE, INC.)
 5 ATX, ATX II, AND WILDERNESS TIRES) Master File No.
 6 C-B/S PRODUCTS LIABILITY LITIGATION) IP 00-9373
 7) MDL No. 1373
 8)
 9 THIS DOCUMENT RELATES TO ALL) Hon. Sarah Evans
 10 ACTIONS) Barker
 11)
 12 VIDEO DEPOSITION OF
 13 WITNESS: WILLIAM CLAY FORD, JR.
 14 LOCATION: Ritz Carlton Hotel
 15 Dearborn, Michigan
 16 DATE: March 27-28, 2002
 17 8:30 a.m.
 18 BEFORE: MAGISTRATE JUDGE
 19 V. SUE BLODGETT SHIELDS
 20
 21 VIDEO TECHNICIAN: Reitman Video Specialists, Tim Reitman
 22 REPORTER: Patricia R. Murray, CSR-2155
 23 Patricia J. Hyland, RPR, CSR-0453
 24
 25

0002
 1 FIRST JUDICIAL ADMINISTRATIVE REGION
 2 "ALL CASES"
 3 IN RE BRIDGESTONE/FIRESTONE AND FORD }
 4 CASES COORDINATED FOR PRETRIAL } MASTER FILE NO.
 5 PROCEEDINGS UNDER RULE 11 OF THE }
 6 TEXAS RULES OF JUDICIAL ADMINISTRATION }
 7 SECOND JUDICIAL ADMINISTRATIVE REGION
 8 "ALL CASES"
 9 IN RE BRIDGESTONE/FIRESTONE AND FORD }
 10 CASES COORDINATED FOR PRETRIAL } MASTER FILE NO.
 11 PROCEEDINGS UNDER RULE 11 OF THE } 2001-01-410
 12 TEXAS RULES OF JUDICIAL ADMINISTRATION }
 13 THIRD JUDICIAL ADMINISTRATIVE REGION
 14 "ALL CASES"
 15 IN RE BRIDGESTONE/FIRESTONE AND FORD }
 16 CASES COORDINATED FOR PRETRIAL } MASTER FILE NO.
 17 PROCEEDINGS UNDER RULE 11 OF THE } 2001-11-001
 18 TEXAS RULES OF JUDICIAL ADMINISTRATION }
 19 FOURTH JUDICIAL ADMINISTRATIVE REGION
 20 "ALL CASES"
 21 IN RE BRIDGESTONE/FIRESTONE AND FORD }
 22 CASES COORDINATED FOR PRETRIAL } MASTER FILE NO.
 23 PROCEEDINGS UNDER RULE 11 OF THE } 2001 CI 04351
 24 TEXAS RULES OF JUDICIAL ADMINISTRATION }
 25 FIFTH JUDICIAL ADMINISTRATIVE REGION
 26 "ALL CASES"
 27 IN RE BRIDGESTONE/FIRESTONE AND FORD }
 28 CASES COORDINATED FOR PRETRIAL } MASTER FILE NO.
 29 PROCEEDINGS UNDER RULE 11 OF THE } 2001-04-010000
 30 TEXAS RULES OF JUDICIAL ADMINISTRATION }
 31 SIXTH JUDICIAL ADMINISTRATIVE REGION
 32 "ALL CASES"
 33 IN RE BRIDGESTONE/FIRESTONE AND FORD }
 34 CASES COORDINATED FOR PRETRIAL } MASTER FILE NO.
 35 PROCEEDINGS UNDER RULE 11 OF THE }
 36 TEXAS RULES OF JUDICIAL ADMINISTRATION }
 37 EIGHTH JUDICIAL ADMINISTRATIVE REGION
 38 "ALL CASES"
 39 IN RE BRIDGESTONE/FIRESTONE AND FORD }
 40 CASES COORDINATED FOR PRETRIAL } MASTER FILE NO.
 41 PROCEEDINGS UNDER RULE 11 OF THE }
 42 TEXAS RULES OF JUDICIAL ADMINISTRATION }

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0004
 1 APPEARANCES FOR MDL
 2 PLAINTIFFS:
 3 ZACK KOSNITSKY
 4 100 S.E. 2nd Street, #2800
 5 Miami, FL 33131
 6 BY: MR. H. STEPHEN RASH
 7 (305-539-8400)
 8 FOR TCC PLAINTIFFS:
 9 LAW OFFICES OF FRANK BRANSON
 10 4514 Cole Ave., Ste. 1800
 11 Dallas, TX 75205
 12 BY: MR. FRANK BRANSON
 13 MR. JERRY WHITE
 14 (214-522-0200)
 15 DENNEY & BARRETT, P.C.
 16 870 Copperfield Drive
 17 Norman, OK 73072
 18 BY: MR. RICHARD L. DENNEY
 19 MS. LYDIA BARRETT
 20 (405-364-8600)
 21 HILLYARD, BARNHART & EKKER
 22 7887 E. Belleview, Ste. 1200
 23 Englewood, CO 80111
 24 BY: MR. W. RANDOLPH BARNHART
 25 (303) 793-0700
 FOR CALIFORNIA
 PLAINTIFFS:
 GREENE, BROILLET, TAYLOR,
 WHEELER & PANISH
 100 Wilshire Blvd., 21ST FL.
 Santa Monica, CA 90407
 BY: MS. CHRISTINE D. SPAGNOLI
 (310-576-1200)
 FOR DEFENDANT FORD:
 SNELL & WILMER
 One Arizona Center
 Phoenix, AZ 85004
 BY: MR. WARREN PLATT
 (602-382-6000)
 LOCKE REYNOLDS
 201 N. Illinois Street, STE. 1000
 Indianapolis, IN 46244

0409

1 THE WITNESS: Some were defective, yes.
 2 BY MR. DENNEY:
 3 Q. You concluded some of those did cause people to be
 4 injured or die?
 5 MR. MALONE: Objection; foundation.
 6 THE WITNESS: Yes.
 7 BY MR. DENNEY:
 8 Q. As I understand it, sir, by the most recent reports
 9 within the United States that number is somewhere
 10 near 270 or so. Is that your understanding?
 11 MR. PLATT: Object to the form of the
 12 question; no foundation.
 13 THE WITNESS: Yes. That's roughly the
 14 number that I understand.
 15 BY MR. DENNEY:
 16 Q. You have had reported to your company a number of
 17 deaths in addition to that overseas, haven't you,
 18 sir?
 19 A. Yes.
 20 Q. You intend to be responsible for those because you
 21 sold those tires on your vehicles, is that a fair
 22 statement?
 23 MR. MALONE: Object to form and foundation.
 24 THE WITNESS: If the tire was defective and
 25 it was on our vehicle, we will stand by it, yes.

0410

1 BY MR. DENNEY:
 2 Q. Is it fair to summarize what I thought I heard you
 3 try to say several times yesterday, that it's been
 4 your conclusion at Ford Motor Company -- at least
 5 you've been advised by your engineers -- that for
 6 the most part when one of these tires separates on
 7 an Explorer, the fact the vehicle rolls over is not
 8 something the driver can prevent?
 9 A. It's hard to generalize but I certainly would not
 10 blame the driver for loss of control on a tread
 11 separation.
 12 Q. That saves you and me a lot of time today.
 13 Now, I want to ask you a hypothetical
 14 question, sir, and I've written that question out
 15 because I'm taking your deposition as one of the
 16 policymakers of this company and I've written it out
 17 for a very specific reason that I'm going to be
 18 specific about and I'm going to mark it as 2980 to
 19 this deposition.
 20
 21 (Deposition Exhibit No. 2980 was marked.)
 22
 23 It's a hypothetical so it assumes facts
 24 your lawyers may contest and you may contest.
 25 You understand that's what a hypothetical is, don't

0411

1 you, sir?
 2 A. I do.
 3 Q. I want you to assume if I prove to a jury that by
 4 March of 1999 senior executives at Ford Motor
 5 Company knew with certainty that if they did not
 6 immediately replace these tires people would die or
 7 be injured within the next few weeks or months but
 8 did not act to prevent those deaths and injuries,
 9 I'm going to ask you to characterize that conduct
 10 for me, sir.
 11 But I'm going to hand you this hypothetical
 12 and ask you to take a look at it because that's
 13 going to be my hypothetical. I know you may not
 14 agree with that, sir. Let me ask you that first.
 15 You don't agree with that fact, is that
 16 right?
 17 MR. PLATT: Give us a moment.
 18 (A pause was had in the proceedings.)
 19 MR. PLATT: We read the hypothetical. You
 20 haven't yet asked the question. What's your
 21 question.
 22 BY MR. DENNEY:
 23 Q. Assuming that's a hypothetical, can you agree that
 24 if that's true, that it would be reckless to do
 25 that?

0412

1 MR. PLATT: Object to the form of the
 2 question; it calls for legal conclusion.
 3 MR. MALONE: Place a foundation objection.
 4 MR. PLATT: Also, Mr. Denney, I just want
 5 to make sure I understand. Your hypothetical makes
 6 no assumptions as to whether the product is
 7 defective. It just says if the accident happens.
 8 Do you really mean the hypothetical that way?
 9 MR. DENNEY: Yes, let's add that to it. If
 10 the accident happens, let's put in here -- would die
 11 or be injured in an accident caused by a defective
 12 tire.
 13 BY MR. DENNEY:
 14 Q. So you understand what I'm talking about, Mr. Ford,
 15 in my hypothetical, is these defective tires on
 16 Explorers that you and I have been talking about --
 17 you understand that, sir, that I mean to ask you
 18 that?
 19 MR. MALONE: Object to the form of the
 20 question.
 21 THE WITNESS: I do.
 22 BY MR. DENNEY:
 23 Q. Taking that into account will you agree with me that
 24 if a Ford employee did that, if they did not act
 25 immediately when they knew in the next couple weeks