

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION**

In re: BRIDGESTONE/FIRESTONE, :
INC., ATX, ATX II AND WILDERNESS : Master File No. IP 00-9373-C-B/S
TIRES PRODUCTS LIABILITY : MDL No. 1373
LITIGATION : (centralized before the
: Honorable Sarah Evans Barker)

:
THIS DOCUMENT RELATES TO :
THE MASTER COMPLAINT :

**CLASS PLAINTIFFS THIRD SUPPLEMENT OF JURISDICTIONAL
EVIDENCE REGARDING BRIDGESTONE CORPORATION**

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I. INTRODUCTION

The following evidence is supplied to further assist and specific jurisdiction arguments as expressed in 1) Defendant Bridgestone Corporation's Motion to Dismiss for Lack of Personal Jurisdiction; and 2) Class Plaintiffs' (1) Response to Bridgestone Corporation's Motion for Protective Order; and (2) Supplemental Response to Bridgestone Corporation's Motion for Lack of Personal Jurisdiction; and 3) Class Plaintiffs' Opposition to Bridgestone Corporation's Motion to Dismiss for Lack of Personal Jurisdiction; the weight of the evidence in the record of this case regarding Bridgestone's U.S. presence and control over Firestone continues to mount, Plaintiff's jurisdictional evidence and information at this time in support of jurisdictional evidence and information weight of the evidence, Bridgestone Corporation is clearly subject to the jurisdiction of

II. NUMEROUS COURTS HAVE EXERCISED JURISDICTION OVER BRIDGESTONE CORPORATION

Due to the overwhelming evidence of Bridgestone's presence and control over Bridgestone/Firestone, an exercise of jurisdiction over Bridgestone Corporation is warranted.

Gloria Gregory v. Bridgestone/Firestone, Inc., et. al., Civ. Action No. 00-C-1583, Ohio County Court, West Virginia, 5/31/01, order attached as Ex. 1.

Emily McDaniel v. Bridgestone/Firestone, Inc., Civ. Action No. 00-C-1583, Hampton County, South Carolina, 7/18/01, order attached as Ex. 2.

William Floyd Robinson v. Bridgestone Firestone Inc., 00-CP-40-4107, Richland County, South Carolina, 5/15/01, order attached, Ex. 3, and transcript of hearing attached, Ex. 4.

Ironically, Ironically, Bridgestone seeks to Ironically, Bridgestone seeks to avail itself of the very system over it.

B. Bridgestone Corporation Has Strenuously Increased the U.S. Presence of Bridgestone Brands in the Recall.

At another press conference, Bridgestone CEO Watanabe said that Bridgestone would like to have Firestone sell more of Bridgestone's brands in the U.S. as a result of the recall.

Leading automobile tire maker Bridgestone Corp. said it would like to revive North American operations of its Bridgestone brand to revive North American operations related to the Firestone brand . . . The company said it would like to revive North American operations related to the Firestone brand . . . some 50% of group sales in North America within a few years, President Watanabe said at a press conference. Currently, Bridgestone accounts for about 30% of Firestone's sales. Firestone makes up 70%. Bridgestone to Promote Own Brand In North America, Dow Jones Newswires, 8/10/01, Ex 10, see, also Ex. 8.

C. Bridgestone Corporation Contracted with an Independent Expert to Conduct a Root Cause Analysis of the Tires in Question.

Bridgestone hired the independent expert to determine root cause of the tire defect. Bridgestone's contract with root cause expert Dr. Govindjee is not with Firestone. Dr. Govindjee is a corporation of Japan, acting through its subsidiaries, *inter alia*, Bridgestone/Firestone, Inc. Govindjee Disclosure Agreement, 09/05/00, Ex. 11.

D. Bridgestone Corporation Continues to Bridge the Gap Between Bridgestone and Firestone, Inc.

In addition to hiring Dr. Govindjee, Bridgestone sent Japanese technical experts and engineers joined in the investigative group from Firestone examining tire recall issues. See Congressional Testimony, Aug. 12, 2001, *Bridgestone/Firestone, Inc.*, *Bridgestone/Firestone, Inc.*, *Bridgestone/Firestone, Inc.*, MDL No. 1373, June 21, 2001, and August 20-21, 2001, Ex. 13. Jacques Nasser, President and CEO of Ford Motor

of of Jaof Japanese paof Japanese participation in the recall efforts. Deposition of Jacques Nasser
Bridgestone/Firestone, Bridgestone/Firestone, Inc., ATX, ATXII, and Bridgestone/Firestone, Inc., ATX, ATXII, and
MDL No. 1373, Aug. 22-23, 2001, at 402:24-25; 403:01-25; 404:01-18 (Nasser Dep.), Ex. 14.

E. Bridgestone Corporation was Aware and on Early Notice of the Tire Defect.

In a deposition of Firestone's Vice President In a deposition of Firestone's Vice President o In a depos
Martin, Mr. Martin testified that Bridgestone was the first to become aware of tread belt separa
on the tires as early as 1997. Deposition of Robert O. Martin, *In Re: Bridgestone/Firestone, In Re: Bri*
ATX, ATXII, and Wilderness Ti ATX, ATXII, and Wilderness Tires, C-B/ ATX, ATXII, and Wilderness Tires
2001, at 14:23-25; 15:01-06 (Martin 2001, at 14:23-25; 15:01-06 (Martin May 7, 2001, Dep.), Ex. 15; Dep
Ryan Anthony Guillen, et al. vs. Bridgestone/Firestone, Inc., Sept. 29, 2000, at Sept. 29, 2000, at 71:22-25; 7
72:10-25; 72:10-25; 73:-01-14 (M72:10-25; 73:-01-14 (Martin 72:10-25; 73:-01-14 (Martin Sept. 29, 2000, D
Saudi Arabian complaints came to Bridgestone about a Fi Saudi Arabian complaints came to Bridgeston
Firestone, and requested Firestone's involvement to find answers to th Firestone, and requested Firest
Robert O. Martin, *Jose Javier Jimenez, Jose Javier Jimenez, et al. vs. Bridgestone/Firestone, Inc., et al.,* No
at 161:17-25; 162:01-18 (Martin Nov. 27, 2000, Dep.), Ex. 17.

Ford Motor Company engineer Thomas Baughman Ford Motor Company engineer Thomas Baughman
were initially shipped to Japan. Dep were initially shipped to Japan. Deposition were initially shipped to
al. vs. Ford Motor Company, et al., Dec. 21, 2000, at 6:02-10; 6:18-25; 7:01; 167:01-25; 168:01-24
(Baughman (Baughman Dep.), Ex. 18. Firestone executive John (Baughman Dep.), Ex. 18. Firestone executi
Behr Dep. at 818:10-20; 932:03-25; 933:01-03, Ex. 13.

Bridgestone (and Firestone) executive Hideo Har Bridgestone (and Firestone) executive Hi
collected in the Middle East collected in the Middle East on Bridg collected in the Middle East on Bri

However, However, Bridgeston However, Bridgestone s answers to interrogatories in t
representations representations made to NHTSA, claiming: Bridgestone was not a memb
ror other group in the United States, 1994-2000. May 25, 2001 Responses and Objectio
Plain Plaintiffs Plaintiffs Plaintiffs Interrogatories to Defendant Bridgestone Corporation, Response No. 1
Bridges Bridgestone Bridgestone c Bridgestone cannot have it both ways: to deny trade association membershi
purposes purposes but seek to adopt this membership and en purposes but seek to adopt this membership and
agency.

H. Bridgestone Corporation Made the Decision to Close the Decatur Plants.

The The closing of th The closing of the The closing of the Decatur Firestone plant was announced i
decision decision made by Bridgestone decision made by Bridgestone Corporation, not Bridgestone/Firestone, Inc.
May May Close Decatur, Ill., May Close Decatur, Ill., Plant, Eriko Amaha, Reuters, 6/27/01. Ex. 27. (In making
Bridgestone Bridgestone also Bridgestone also announced it had advised the United Bridgestone also announced it t
of Bridgestone s U.S. labor involvement, *infra*.)

I. Bridgestone Corporation Controls Bridgestone/Firestone, Inc.

The The evidence on the issue of Bridgestone s The evidence on the issue of Bridgestone s control The eviden
Robert Robert Martin, Director of Qualit Robert Martin, Director of Quality Ass Robert Martin, Director of Qual
testified testified that **he would he would have probably he would have probably put on high heels and danced**
had had asked him to. Martin. Martin Sept. 29, 2000, Dep. at 118:13-25, emphasis added, Ex. 16.. Martin Sept.
testified testified that when he was directed by the Japanese to change things, testified that when he was directed by t
29, 2000, Dep. at 118:13-25, Ex. 16.

Long-time Long-time Bridgestone Corporation employee Long-time Bridgestone Corporation employ
conduct conducts conducts testing of Bridgestone tires for Bridgestone; that Firestone did not need permissicon

BridgestoneBridgestone to develop, manufacture and sell Bridgestone tires, that Firestone copied the BridgestoneBridgestone Dueler tire in the U.S. for manufacture and saleBridgestone Dueler tire in the U.S. for ma targettarget speciftarget specificattarget specifications for Firestone tires. Hara Dep. at 147:03-155:14; 155:16-214:01-15; 238:04-242:07; 242:11-251:24; 252:02-25; 253:01-257:02, Ex. 19.

Firestone tire classifier Jan Wagoner testifiedFirestone tire classifier Jan Wagoner testified that when Bri things things began to change at the Decatur things began to change at the Decatur plant. Deposition things began vs. *vs. Bridgestone/Firestone, vs. Bridgestone/Firestone, Inc., et al.*, Oct., Oct. 26, 2000, at 15:08-12; 15:15-22; 16: (Wagoner (Wagoner (Wagoner Dep.) (Wagoner Dep.), Ex. 28. Bridgestone, then Firestone, manager Mr. afterafter the merger Bridgestone and Firestoneafter the merger Bridgestone and Firestone became one. Depo *Bridgestone/Firestone, Bridgestone/Firestone, In Bridgestone/Firestone, Inc., Bridgestone/Firestone, Inc., Bridgesto MDL No. 1373, July 10, 2001, at 19:23-24 (Ball Dep.), Ex. 29.*

JacquesJacques Jacques Nasser, Jacques Nasser, Jacques Nasser, President Jacques Nasser, President Jacques of control:

I I look I look at this as a customer. I look at this as a customer. And Bridgestone/Firestone, Bri thethe samethe same responsibilities they are just different brands and they happen tothe same resp incorporatedincorporated in different countries. Andincorporated in different countries. And that **theirtheir biggest customers and when I think of Firestone, I think of Bridgestone/Firestone, Bridgestone/Firestone, a Bridgestone/Firestone, a JapaneBridgesto** 648:13-19, Ex. 14.

Mr.Mr. Nasser went on to testify that he is in staunch disagreement with the statements and conclusionsconclusions of Mr. Kita andconclusions of Mr. Kita and that he has personal knowledge which contrad Dep. at 646:20-25, 647:01-25; 648:01-19, Ex. 14. In sum, Mr. Nasser concluded:

I I don t think (the I don t think (the Kita Affidavit) represents the reality of the business. I don do do not see any real world difference between Bridgestone/Firestone in the U.S. and Bridgestone as a global corporation.

Nasser Dep. at 649:19-20; 662:06-12, Ex. 14.

AA speech by the president of Bridgestone Corporation given in Akron, Ohio shortly after
Bridgestone initially purchased Firestone is illustrative on
Firestone and on Bridgestone's U.S. presence:

Introduction:

Since the Bridgestone/Firestone merger, I have gotten to know Mr. Yeiri from his visits here to the United States. I had the pleasure of working with several of his colleagues on a basis here in Akron . . . (p.3)

Speaking: Akira Yeiri (then president and CEO of Bridgestone):

Each time I visit Akron, I am reminded of its leading role in the tire and rubber industry. Much of what we do here has its roots here. Much of what we will do has been accomplished in no small measure by the energies and the talents of the people of Akron.

Today, among other topics, I would like to introduce our management philosophy so that you have a better understanding of Bridgestone and how we operate. (p.4)

Thus, **when viewed as a single unit**, the Bridgestone/Firestone group's geographic positioning is ideal in that products can be manufactured locally to suit any market. (p.5)

. . . As globalization of the automobile industry has accelerated, automobile manufacturers, the tire industry's largest manufacturers, must be able to provide their tire suppliers with services throughout the world. (p.5-6)

With technical centers, manufacturing facilities, all three of the world's major markets, the US, Europe, and Asia, the Bridgestone/Firestone group is in position to meet the requirements of these ever so important customers. (p.6)

We have, however, been working together in a number of areas and joint effort expanding as we move into the future. Such areas as distribution, management information systems and human resources have seen positive coordination.

Also beneficial has been the exchange of information among our three technical centers. (p.7)

... over 100 Bridgestone technical staff are now stationed in Firestone. ... over 100 Bridgestone and technical centers.

The 1.5 billion investment announced last November has enabled us to increasingly focus attention on the production process . . .

And now with the recently announced introduction of Mastercare stores, our companies are working on product marketing, as well.

... we must always remember that we are part of a team working toward a common goal and that the real beneficiaries of our search for those we work together with. This is those we work together with philosophy. (p.10)

... around the world we have 88,000 employees and virtual international family standing behind our corporate model of superior quality, a solid group which we know will far into the future. (p.15)

... The first question from the audience is: Mr. [Name] have for the Firestone/Bridgestone presence in Akron?

... We believe that we will be able to develop between the Bridgestone and Firestone partnership a great deal of synergy. And in doing all the operations of Firestone, not only here in

... Bridge . . . Bridgestone is known worldwide for its support of art. What role will it play in the Akron area?

... Firestone has for a long time been very actively involved in the community here in Akron. We, when we were very active in our own communities.

Now that we are together in this partnership, we look forward to building upon the support that Firestone has provided and support. (p.19)

Again, referring to the synergy concept between us, we will all work very hard together **to make this company to make this company** possible for a takeover candidate. (p.21-22)

Transcription of Speech: July 20, 1989, Akira Yeiri
Ex. 30. Mr. Yeiri was not alone in his discussion
Bridgestone and Firestone; Mr. Hideo Hara also testified
and Firestone. Hara Dep. at 208:01-11, Ex. 19.

**J. Bridgestone Corporation Employees Bridgestone Corporation
States.**

Harry McMillan, Firestone Plant Manager, testified that the
Bridgestone Corporation in the Decatur, Illinois plant in almost
at 9:17-25; 10:01-08; 10:16-19; 133:18-25; 134:01-13, Ex. 13.
Bridgestone has employees in the Detroit area. Behr Dep. at 494:01-03, Ex. 13.

**K. Bridgestone Corporation Employees and Agents Make Frequent
Trips to the United States.**

Firestone employee Kenneth Ball testified he had taken trips to Japan. Ball Dep. at 19:01-04,
Ex. 29. Long-time Firestone engineer James Gardner testified he visited Japan annually and that
Bridgestone engineers travel to the United States. Deposition of James D. Gardner, *Vicki Vicki Vicki H*
Etc., Etc., et al. vs. Bridgestone/Firestone, Inc., Etc., et al. vs. Bridgestone/Firestone, Inc., et al., Feb. 14, 2000
61:02-1461:02-14 (Gardner Dep.), Ex. 31. Hideo Hara tes61:02-14 (Gardner Dep.), Ex. 31. Hideo Hara tes
Akron Technical Center 3 to 4 times Akron Technical Center 3 to 4 times per Akron Technical Cent
Technical Center to review new technologies. Hara Dep. a
13, Ex. 19. Travel invoices produced by Bridgestone also13, Ex. 19. Travel invoices produced by
United States by Bridgestone employees. Ex. 32. Jacques Nasser
Mr. Kaizaki, then CEO of Bridgestone. Nasser Dep. at 406:21-25; 407:01-25, Ex. 14.

. . . the following individuals . . . the following individuals have served on the . . . the following i
Firestone and Bridgestone since Firestone was acquired by Bridgestone:

Masatoshi Ono
Yoichiro Kaizaki
Akihiro Ono
Kazuyuki Hirai
Akio Mino
Takeshi Uchiyama
Kenjii Shibata
John Lampe
Norihiro Takeuchi
Kenzo Matsuo

Bridgestone/Firestone, Bridgestone/Firestone, Inc. s Supplemental Response to Plaintiffs InteBridgestone/Fir
Jurisdiction Over Bridgestone Corporation, 07/05/01, Ex. 34.

ManyMany long-Many long-time Many long-time Bridgestone Corporation employees spend some year
Firestone, Firestone, rotating between the companies. Firestone, rotating between the companies. AnFirestone, rota
TireTire Operations Into Four Operating Units; New Alignment Will Speed DecisionTire Operations Into F
Increase Knowledge Sharing And Accountability Across the Organization states:

Shigehisa Shigehisa Sano will be a Shigehisa Sano will be appoin Shigehisa Sano will
Bridgestone/FirestoneBridgestone/Firestone anBridgestone/Firestone and Bridgestone/Firesto
effectiveeffective next month. Sano, 54, is currently director ofeffective next month.
development for Bridgestone Corporation in Japan.

ItsuoItsuo Miyake will become president of Bridgestone/Firestone
Research.Research. MiyakeResearch. Miyake, 53, has been general manager of Tire Material
Development at Bridgestone Corp.

KazKaz Nishigai, 50, will be appointedKaz Nishigai, 50, will be appointed plant manager of theKa
WarrenWarren County, Warren County, Tenn. Facility, succeedingWarren County, Tenn. Facility,
isis accepting a new assignment withis accepting a new assignment with Bridgis accepting
Japan. Ex. 35.

(http://www.findarticles.com/cf_0/m4PRN/2000_Oct_18/66188075/print.jhtml)

TheseThese are only examples of the systematic anThese are only examples of the systematic and reg
BriBridgestoneBridgestone aBridgestone and Firestone. Long-time Bridgestone employee Mr. Hara testif

BridgestoneBridgestone employees come to FirestoBridgestone employees come to Firestone andBridgeston
106:01-106:01-10;106:01-10;106:01-10;107:07-25;106:01-10;107:07-25;106:01-10;107:07-25;108:01-23,106:
returningreturning toreturning to Japan as did Harry McMillan. Behrreturning to Japan as did Harry McMillan. Be
25; 127:01-05, Ex. 25.

O. BridgestoneBridgestone Corporation Engineers and Firestone Engineers ExchangeExchange Technology, Information and Collaborate in the Design, Development, Manufacture and Testing of Tires.

BridgestoneBridgestone and Firestone freely exchangeBridgestone and Firestone freely exchange techno
adjustmentadjustment and claims data. Gardner Dep. at 61:15-22, Ex.adjustment and claims data. Gardner Dep. at
callingcalling thecalling the technology exchange extensive. calling the technology exchange extensive. Hideo Ha
newnew tire technologies to Firestonenew tire technologies to Firestone in addition to supplying extensivenew t
Dep.Dep. at 24:06-25:13, Ex. 19. Mr. Hara confirDep. at 24:06-25:13, Ex. 19. Mr. Hara confirmed that Bri
FirestoneFirestone and vice versa. Hara Dep. at 155:16-25; 156:01-07; 157:08-Firestone and vice versa. Hara Dep. a
19.19. Mr. Hara also testified he regularly asked Japan for design information before finalization 19. Mr. Hara also
hehe was with Firestone. Hara Dep. athe was with Firestone. Hara Dep. at 320:07-09, Ex. 19. Mr. Hara indicat
FirestoneFirestone worked together on the tiresFirestone worked together on the tires for the Middle East Explore
19.19. John Behr19. John Behr testified that19. John Behr testified that a Firestone tire for the Ford F150 was de
674:09-25; 675:01-11, Ex. 13.

**P. BridgestoneBridgestone CorBridgestone CorporationBridgestone Corporation Bridgestone C
in the United States and Having a Substantial U.S. Presence.**

NumerousNumerous witnesses have testified as to Bridgestone s presence in the UnitNumerous witness
HideoHideo Hara testHideo Hara testified thaHideo Hara testified that prior to the Bridgestone Merger, Bridgest
U.S.U.S. byU.S. by Bridgestone sales channels and that after the mergerU.S. by Bridgestone sales channels and that

channels. Hara Dep. at 208:01-25; 209:01-21, Ex. 19. channels. Hara Dep. at 208:01-25; 209:01-21, Ex. 19. tires are manufactured in the United States. Hara Dep. at 208:01-25; 209:01-21, Ex. 19. testified regarding the use of Bridgestone manufactured tires. Hara Dep. at 208:01-25; 209:01-21, Ex. 19. being arranged through Bridgestone; and his company's business with Bridgestone was being arranged through Bridgestone; and his company's business with Bridgestone was being arranged through Bridgestone. Hara Dep. at 501:06-12; 501:06-12; 20-25; 507:09-21; 508:12-25; 509:01-08; 509:15-25; 501:06-12; 20-25; 507:09-21, Ex. 13.

Kenneth Ball testified that Bridgestone tires made in Japan were sold for use in this country. Ball Dep. at 18:06-10, Ex. 29. Mr. Ball was a Bridgestone Corporation employee coming to the U.S. for tire inspections. Ball Dep. at 18:06-10, Ex. 29.

David Laubie testified that Bridgestone purchased a truck tire plant in La Vergne, Tennessee to manufacture tires in the U.S. before it merged with Firestone. it merged with Firestone. Laubie Dep. at 22:08-22 (Laubie Dep.), Ex. 36. Harry A. Laubie, *In Re: Bridgestone/Firestone, Inc., ATX, ATX II, and Wilderness Tires, C-B/S Liability Litigation*, MDL No. 1373, May 10, 2001, at 22:08-22 (Laubie Dep.), Ex. 36.

McMillan testified that Bridgestone auditors conducted tours and audits of Bridgestone's Decatur plant. McMillan Dep. at 134:03-13; 136:11-25; Decatur plant. McMillan Dep. at 134:03-13; 136:11-25. According to Mr. McMillan, at Decatur we had a significant presence for ten years. McMillan Dep. at 307:11-17., Ex. 25. Mr. McMillan went on to describe Bridgestone's presence for ten years at Decatur, Illinois plant admitting there were a significant presence for ten years. McMillan Dep. at 307:11-17., Ex. 25. On., at 122:11-25; 123:01-25; 124:01-25; 125:01-25; 126:01-25; 127:01-05, Ex. 25. presence, Mr. McMillan was clear:

Supplier of the Year for the sixth consecutive performance in quality, service, technology and price. Ex. 38.

(<http://www.bridgestone-firestone.com/homeimages/H010501a.html>); Honored by General Motors as a 2000 Supplier of the Year for the sixth consecutive performance in quality, service, technology and price. Ex. 38. Washington, D.C. (May 1, 2001))

Auto industry expert George Hoffer testified, among other things, that activities in this country in which Defendant Bridgestone Corporation is engaged, including sales to original manufacturers, tires sales directly to consumers of George E. Hoffer, *In Re: Bridgestone/Firestone, Inc. ATX, ATX II, and Wilderness Tires Products Liability Litigation*, MDL No. 1373, May 2, 2001, MDL No. 1373, May 2, 2001, (Hoffer Dep.), Ex. 39.

The State of Ohio's website on Foreign Corporations in Ohio informs the presence of Bridgestone Corporation in the U.S.:

The Bridgestone Corporation is a global leader in the rubber products industry. . . . The Tokyo based global presence and contains 489 consolidated subsidiaries.

Bridgestone has capitalized on Ohio's strengths in the rubber products industry. The company's presence in Ohio with its American subsidiary Bridgestone/Firestone Corp. employs approximately 2,000 employees primarily in its multiple production facilities located in Findlay. The company also has Ohio facilities in Upper Sandusky.

Bridgestone Corporation Facts and Highlights:

- Corporate Headquarters: Tokyo, Japan
- ...
- Ohio as a Percentage of Global Employment: 2.5%
- Bridgestone is the second largest tire supplier in North America with 20% of the North American market share
- The Bridgestone Corporation- The Bridgestone Corporation- The Bridgestone Corporation- consolidated subsidiaries

Letters from unions representing thousands of in eight countries have been sent this week to Yoichiro Kaizaki, Chairman and Chief Executive Chairman and Chief Executive multinational, multinational, expressing support for the United Steelworkers of America (USWA) and urging the company to settle contract negotiations with the union before the deadline. In addition, these unions have sent work delegations to see local Bridgestone/Firestone plant managers in their respective countries this week to deliver the same message.

Among the unions -- all of which represent Bridgestone employees which have thus far taken action are Lastik-Isi Union of Metalworkers of South Africa; Hospitality and Miscellaneous Workers Union; the International Brotherhood of Teamsters in the U.S.; the Metallurgie in Canada; the Frente Unico de Trabajadores Sindicato Unico de Trabajadores of Chile.

These unions, together with the USWA level to the International Federation of Chemical General Workers Unions (ICEM), which worldwide. Earlier this month in St. Louis, leaders from around the world met and pledged their solidarity to the USWA in this round of bargaining call on their members to engage in solidarity activities the USWA in the event of a strike.

... Fred Higgs, ICEM General Secretary amicably and expeditiously reach a just new agreement with the USWA.

The U.S. collective bargaining The U.S. collective bargaining The U.S. collective bargaining some 8,000 workers at Bridgestone operations in some 8,000 workers at Br

(http://www.findarticles.com/cf_0/m4PRN/2000_August_31/64840245/print.jhtml)

A conference for Bridgestone workers worldwide was held in St. Louis. A conference for

ICEM, Steelworkers Union to Host World Conference of Bridgestone Unions states:

The International Federation of Chemical, Energy, Mine and Workers Unions (ICEM) and the United Steelworkers of America announced today they will host a world conference for workers employed by Bridgestone in St. Louis, Missouri.

an expensive and messy venture into the U.S. market. The investment programme in the early 1980s was a two-year labour dispute which brought the rebuke from president Clinton, Firestone has begun to w

The opening shot in this battle was fired earlier this month what the Japanese company called the most important launch ever for the Firestone brand. Ex. 57.

V. Bridgestone Corporation Set Up Youth Gro Bridgestone Corporation Set Up States.

According to Bridgestone's website: In the United States, Bridgestone set up Fire/hawks Honors Club in 1991 to encourage volunteer environment. (<http://www2.bridgestone.co.jp/cp99e/bscp14.html>), Ex. 58.

W. Bridgestone Corporation Treats Firestone and the U.S. Market as its Own When Speaking to the Public and the Press.

Bridgestone's statements to the press and the public regarding its control of Firestone in its U.S. presence are too extensive to be fully documented, however, illustrative.

An article entitled "Japanese tire firms pursue M&A policy overseas" states:

. . . Bridgestone Corp. boasting the latest move has bought . . . Bridgestone Corp. controlling share in the tire-marketing controlling share in the tire-marketing Rubber Co. of the U.S. . . . Bridg Rubber Co. of the U.S. . . . Bridg from Firestone in 1988, has put all the U.S. firm's tire under control.

Expansion abroad offsets domestic competition: An Expansion abroad Bridgestone Corp. President Akira Yeiri follows: Does the Bridgestone really need to go abroad? Only doing business in Japan has outlived its usefulness. (The Japan Economic Journal, March 5, 1988) (emphasis added) Ex. 59.

An article entitled "Analysts divided on value of Firestone buy" states:

rubber and roofing materials is expected to be expanded at Firestone factories in North America. Such products will be supplied to both Firestone and Bridgestone. Yeiri said that the two companies will continue to work closely and plan to conduct a number of joint ventures. (The Japan Economic Journal, November 30, 1988, p. 62.

Japan Economic Newswire, November 30, 1988, Japan Economic Newswire, November 30, 1988, Bridgestone

Investment Capital :

Akira Ieiri, president of Bridgestone Corp., said Wednesday the company will invest 1.5 billion dollars over the next three years to bolster its U.S. partner, Firestone. Ieiri told a news conference that the two companies will substantially raise the production capacity of their facilities in North America, Europe and Latin America. The investment will contribute about 600 million dollars to Firestone within this year. More than 100 staff members will be dispatched to the American

Under the expansion program, Bridgestone will invest in North America and Europe and start selling Bridgestone products. In North America, Bridgestone will produce products while Firestone will develop sales of products by the two companies. Ex. 63.

Automotive News, February 6, 1989, Bridgestone Expands; Truck, Automotive News, February

Tennessee :

The new plant, which is scheduled to begin construction in 1991, will produce radial truck tires for both Bridgestone and Firestone Tire & Rubber Co., which the Japanese-based Bridgestone acquired last year.

Last November Bridgestone Corp. in Japan announced a billion dollar plan over the next three years to include upgrading the Bridgestone-Firestone production base.

Bridgestone has not determined what tire models it will produce, but a portion of the production will be for passenger tires a month to Japan from the L equipment use on Mazda and Toyota pickups. Ex. 63.

AA September 12, 2000, The Wall Street Journal article entitled Pushing Back: A September 12, 2000, The
Boss Boss Has Toughness, But Is That What Crisis Boss Has Toughness, But Is That What Crisis Deman Boss H
Save Firestone, Denies Hiding Problems -- Career Built on Cost Cutting reports:

TOKYO TOKYO -- (TOKYO -- (Br TOKYO -- (Bridgestone CEO) Mr. Kaizaki (held a
news conference at the Tokyo news conference at the Tokyo headquarters of news conference at
big business lobby -- and he came out swinging. Though big business lobby -- and
expressed regret over the controversy, he expressed regret over the controversy, he sought
by Ford to pin the blame on his company. In his deep by Ford to pin the blame on his comp
executive forcefully denied Bridgestone had sought to hide
information about the affair from U.S. authorities.

There are worries about the future of There are worries about the future of Fir T
conceded, but we promised, but we promise to support
total strength of the Bridgestone group.

Bridgestone executives say that Mr. Kaizaki did Bridgestone executives say that
involved, leading a team of about 20 senior involved, leading a team of about 20 senior p
Tokyo to handle the mounting crisis. Yesterday Tokyo to handle the mounting crisis.
disclosed that he had made a secret disclosed that he had made a secret trip to disclo
situation, but he and his situation, but he and his spok
mission.

Yesterday, Mr. Kaizaki did bat back at Ford, who
tire supplier for the entire Firestone fiasco.

There has been some talk of There has been some talk of a coverup, but
there was no such thing, he said.

Mr. Kaizaki . . . recalled the days a decade ago when
America struggling to turn the America struggling to turn the the
amam very aware that we have suffered a nearly fatal blow, he told
reporters. But we came back from the same place reporters. But we c
it is not impossible to do so again, . . . I think I can do it.

Early in 1991, Bridgestone President Akira Yeiri asked Early in 1991, Bridgestone President
to take the helm at Firestone. Mr. Kaizaki, into take the helm at Firestone. Mr. K
interview, said he at first declined. He had no experience interview, said he at first de
Then, Kanichiro Ishibashi, former president and son of Bridgeston Then, Kanichiro Ishibash
founder, told him, This is the order of the comp
recalled in the interview. Take care of it.

And so, Bridgestone, now one of the biggest foreign owners of a manufacturing operation in the U.S., dispatched to Ohio an executive who spoke barely a word of English.

Mr. Kaizaki wasted no time making clear who was reorganizing the company and gave each division chief clearer responsibilities, as well as placards saying, "The Buck Stops Here." He also laid off employees and cut costs relentlessly.

In 1993, for the first time since the acquisition, the Bridgestone/Firestone unit swung into the black, with a \$6 million profit. That year, Mr. Kaizaki got his reward, parent company, and returned to Japan to set about belt-tightening there. (Wall Street Journal; New York, N.Y. Wall Street Journal staff reporters Todd Zaun and Norihiko Shirouzu and Peter Landers, Copyri
Company Inc Sep 12, 2000) Ex. 64.

A Japanese article entitled "Bridgestone president" states:

states:

Bridgestone Corp. President Yoichiro Kaizaki at the company's shareholders meeting for last summer's voluntary recall of millions of defective tires produced by its U.S. subsidiary.

I apologize to all shareholders . . .

(Tokyo, Copyright 2001 Kyodo News Service, Japan Economic Newswire, March 65.

Jacques Nasser testified he was aware of the comments of Tokyo on the issue of Firestone tires and the Explorer vehicle.

Contemporaneous reports of the for discussion of who was in control:

Bridgestone, Japan's largest tire
outbidding the Italian tiremaker Pirelli. . . . The company also outbidding the Italian
that Bridgestone Chairman Teiji Eguchi would begin working that Bridgestone-Firestone headquarters. He arranged
Spokesman Dennis Allen said Eguchi, 63, will try to create a teamwork

atmosphere among Bridgestone-Firestone employees. U.P.I., January 9, 1990, Bridgestone-Firestone Offering Job Buyouts, Ex. 63.

Business Week, February 26, 1990; Why Tiremakers Are Still Spinning Their Wheels :

... May, 1988 Bridgestone buys Firestone for \$2.6 billion

Bridgestone Three-year, \$1.5 billion modernization at Firestone radial truck-tire plant in Tennessee costing \$350 million. ...

Bridgestone has installed new technology for Firestone's fanciest line of tires and is improving the company's quality.

Last fall, Bridgestone ... offered early retirement to 3,400 employees. Layoffs could result, adding to the 250 announced last fall. Last fall, Bridgestone ... operation on Feb. 6 -- and hurting the reputation for employment security that Japanese firms have with Americans. ... Bridgestone Chairman Teiji Eguchi has arrived in Akron to keep an eye on the company for a while.

... Sumitomo and Bridgestone say that they may import fewer tires as they expand their U.S. capacity. Ex. 63.

The Economist, September 7, 1991; Management Brief; When the Bridge Caught Fire :

This case study, the last in our series, shows how Bridgestone tyre company has faced since 1988.

... At the end of this year, Bridgestone headquarters to Nashville, Tennessee.

The aim is to give the firm a new start. This is a third new start the firm has had in the past three years; it was bought; the second when Bridgestone's chairman moved to Akron to take charge of the former Firestone in January 1990.

... Since 1983 Bridgestone had been conducting how to adapt a Firestone tyre factory -- one that encouraged it to buy the whole firm.

Firestone first offered to sell its lorry-tire plant in Tennessee, to Bridgestone in 1980, and eventually in 1983 for \$52 m. The plant had employed 600 workers, until two-thirds of them were laid off in March 1982. When Bridgestone first

talked about buying it, the United Rubber Workers union was Then Firestone threatened to close the plant unless URW co-operated.

... Within two years Bridgestone had restored the toto full-scale output and had rehired all the laid-off invested \$68m to modernise the equipment, raise productivity and retrain workers. And in 1987 it added a car-tyre more people.

After taking over, the first charges production methods; changes in the handled more slowly. All the Firestone products kept on, while 35 Japanese arrived as advisors.

Two hundred (200) manager/teacher headquarters:

... Bridgestone moved its previous American headquarters from California to Nashville, rather than Akron, just a few months after taking over.

In March 1991 Bridgestone sent a new Japanese chairman and chief executive to Akron, and Mr. Eguchi little English and has spent much of his career in tyre operations. But he is a candidate to Firestone round. At last, **the Japanese are taking full control.** 63.

Tire Business, April 17, 1995:

Two new additions to the Potenza line, incorporating the company s latest technical innovations, are about to become available to dealers this summer, is b global flagship for Bridgestone s Potenza Tire Family, Ex. 57.

The Tennessean, April 16, 1997, Bridgestone Investment :

... Bridgesto Bridgestone is introducing its new Firestone FT70c tire with a multi-million-dollar campaign targeting Goody effort is the latest step by the company to build its U.S. market almost a decade after Japan-based Bridgestone bought Firestone. It

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