

1 INTERROGATORY NO. 118:

2 At any time during the period 1948 to 1978, has defendant
3 manufactured automobile brake linings or brake assemblies? If
4 so, please state:

5 (a) The trade or brand name(s) under which the brake
6 linings or brake assemblies were marketed;

7 (b) The years during which the brake linings or brake
8 assemblies, under each trade or brand name, were manufactured;

9 (c) The date each product was withdrawn from the mar-
10 ket, if such is the case;

11 (d) The quantitative percentage of each chemical com-
12 ponent of the brake linings under each trade or brand name;

13 (e) If asbestos was included in the composition of the
14 brake linings which defendant manufactured under any trade or
15 brand name, please state:

16 (i) The type of asbestos fiber (i.e., amosite,
17 chrysotile, crocidolite) used in the brake linings under each
18 trade or brand name;

19 (ii) The quantitative percentage of asbestos fiber
20 used in the brake linings under each trade or brand name;

21 (iii) The years during which asbestos fiber was
22 included in the composition of the brake linings under each trade
23 or brand name;

24 (f) The location of the facility (facilities) where
25 the brake linings or brake assemblies were manufactured.

26 RESPONSE:

27 Yes.

28 (a) OBJECTION. This responding defendant objects to