

1 undercoat sealer by a manufacturer or distributor other than
2 itself, to any of the following entities:

- 3 (a) Chrysler-Plymouth Corp.;
- 4 (b) Ford Motor Company;
- 5 (c) General Motors;
- 6 (d) American Motors;
- 7 (e) Nissan Motors;
- 8 (f) Mitsubishi Motor Car Division;
- 9 (g) Volkswagon;
- 10 (h) British Leyland;
- 11 (i) Sears & Roebuck.

12 RESPONSE TO INTERROGATORY NO. 116:

13 See Wagner's response to Interrogatory No. 111.

14 INTERROGATORY NO. 117:

15 If the answer to any part of Interrogatory No. 116 is
16 affirmative, please state:

17 (a) the identities of each manufacturer or dis-
18 tributor and the above-named entity which received the
19 automobile undercoat sealer;

20 (b) the date(s) of each shipment, sale or dis-
21 tribution of automobile undercoat sealer for which
22 defendant has data or information;

23 (c) the quantity and type, including trade or
24 brand name, of the automobile undercoat sealer
25 shipped, sold or distributed to each of the above-
26 named entities.

27 RESPONSE TO INTERROGATORY NO. 117:

28 See Wagner's response to Interrogatory No. 116.

29 INTERROGATORY NO. 118:

30 At any time during the period 1948 to 1978, has defen-
31 dant manufactured automobile brake linings or brake assemblies?
32 If so, please state:

33 (a) the trade or brand name(s) under which the
34 brake linings or brake assemblies were marketed;

35 (b) the years during which the brake linings or
36 brake assemblies, under each trade or brand name, were
37 manufactured;

38 (c) the date each product was withdrawn from the
39 market, if such is the case;