

- D. Identify all documents relating to the sales; and,
- E. Summarize the financial consideration (including amounts) between the participants in the sale.

RESPONSE:

Yes. Brake linings or assemblies were sold to Wagner, Ford and Bendix from 1960 to 1975. Lining blanks (part numbers 18003125 and 18003131) were sold to Bendix from September, 1977 to December, 1979.

- 23. Did Defendant, Defendant's predecessors or Defendant's subsidiaries ever enter into any multistate distribution agreement with any manufacturer of asbestos-containing products? If so, please state the following as to each such agreement:
 - A. Manufacturer with whom the agreement was entered into;
 - B. Effective dates and periods of the agreement;
 - C. Geographic areas where the product(s) were distributed; and,
 - D. Identify all documents relating to the agreement.

RESPONSE:

GM manufactured and distributed brake linings as replacement parts to GM dealers and AC Delco warehouse distributors. It is unknown what is meant by "multistate distribution agreement" in this context.

- 24. Did Defendant, Defendant's predecessors or Defendant's subsidiaries ever enter into any licensing agreement with a manufacturer of asbestos-containing products? If so, please state the following as to each such agreement.
 - A. Manufacturer with whom the licensing agreement was entered into;
 - B. Description of the central terms and conditions of the agreement;
 - C. Effective dates and period of the licensing agreement;
 - D. Product(s) involved; and,
 - E. Identify all documents relating to the agreement.