(d) The exact wording of each such warning, notice or instruction for each individual asbestos-containing product;

(e) The time period each such warning was used for each asbestos-containing product;

(f) Who prepared the instructions or warnings.

(g) Has the warning notice, statement or instruction ever been altered, amended or changed in any manner; if so:

1. For each product warning that was altered or amended, indicate how and when it was amended and the reason for such amendment or change, and the identity of the person responsible for such amendment or change.

ANSWER: (a) Approximately 1972;
(b) All; on the exterior of the package;
(c) Approximately 1972;
(d) See response to Request for Production O;
(e) Approximately 1972 to present;
(f) S. K. Wellman employees or vendors;
(g) See response to Request for Production O.

REQUEST FOR PRODUCTION O: Pursuant to CR 34, attach or produce according to the above instructions an authenticated copy of each warning label or notice used on any asbestos-containing product sold, manufactured or incorporated in any product manufactured or distributed by you.