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8 SUPERIOR COURT OF THE STATE OF CALIFORNIA
9 CITY AND COUNTY OF SAN FRANCISCO

12 IN RE COMPLEX ASBESTOS LITIGATION,

No. 828684

14 DEFENDANT CHRYSLER
15 CORPORATION ANSWERS TO
16 SAN FRANCISCO SUPERIOR
17 COURT GENERAL ORDER NO. 129
STANDARD INTERROGATORIES
TO FRICTION DEFENDANTS

19 Propounding Parties: Plaintiffs

20 Responding Party: Defendant Chrysler Corporation

21 Set No.: General Order No. 129 Standard Interrogatories to
22 Friction Defendants

23 GENERAL STATEMENT

24
25 Defendant, Chrysler Corporation (hereinafter, "Chrysler"), has provided
26 responses to Plaintiff's Standard Interrogatories to Friction Defendants pursuant to
27 General Order No. 129 in the California Superior Court, City and County of San
28 Francisco and pursuant to a reasonable and duly diligent investigation and search

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1 for information requested during the time period of 1930 to 1985. The responses
2 are given without prejudice to further discovery.

3 These responses are based upon facts known or believed by Chrysler at the
4 time of answering these discovery requests. Much of the information requested
5 dates back many years and is difficult or impossible to reconstruct or retrieve.
6 Thousands of employees have worked at Chrysler over the years and, in
7 conducting business, Chrysler has created millions of documents kept in numerous
8 geographic locations that have been moved as required. Accordingly, Chrysler
9 cannot represent that the responses contained herein provide all information
10 requested; rather these responses reflect information obtained before this date by
11 Chrysler pursuant to a reasonable and duly diligent search and investigation in
12 those areas where this information was expected to be found. To the extent that
13 a given request may be construed to require more, Chrysler states that compliance
14 with a request so construed is not feasible, would impose an undue burden and
15 expense and is not required under the California Code of Civil Procedure.

16 Since, to Chrysler's knowledge, chrysotile is the only type of asbestos used
17 in the brakes and clutches of vehicles manufactured and distributed by Chrysler,
18 Chrysler interprets the term "ASBESTOS CONTAINING FRICTION PRODUCTS" as
19 used in these interrogatories to be limited to chrysotile brake linings, brake pads,
20 clutches, clutch discs, clutch facings and linings, hereafter referred to as asbestos
21 containing automotive brake and/or clutch parts.

22 Pursuant to General Order No. 129, Chrysler provides the information in
23 these responses solely for the purpose of litigation in the California Superior Court,
24 City and County of San Francisco.

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INTERROGATORIES

1. IDENTIFY the individual verifying these answers on YOUR behalf.

ANSWER:

Please see verification.

2. State the date of first employment with YOU and the dates and titles of each job position the person who verified these interrogatories has held while employed by YOU.

ANSWER:

The responses to these interrogatories are corporate responses, prepared with the assistance of counsel and based on a variety of sources, including documents and personal recollections. The person signing these responses on behalf of Chrysler is a person authorized by the corporation to subscribe to the responses on its behalf. A Curriculum Vitae can be made available on reasonable request.

3. State whether or not YOU are a corporation and, if so, state:

- A. YOUR correct corporate name;
- B. YOUR state of incorporation;
- C. The date of YOUR incorporation;
- D. The address of YOUR principal place of business;
- E. Whether or not YOU have ever held a certificate of authority to do business in the State of California and, if so, the inclusive dates of any certificate;
- F. If YOU are wholly owned or the majority interest of YOUR COMPANY is owned by another business entity, state the entity's name and principal place of business;
- G. Whether YOU have any business offices in California and, if so, YOUR principal place of business in California.

ANSWER:

Chrysler is a corporation.

- A. Chrysler Corporation.
- B. Delaware.
- C. 1925.
- D. 1000 Chrysler Drive, Auburn Hills, MI 48236-2766
- E. Chrysler Corporation has held a certificate of authority to do business since October 10, 1928.
- F. Not applicable.
- G. Chrysler maintains places of business in California, but there is no one place that is Chrysler's principal place of business in California.

As used herein, "HISTORICAL RECORDS" shall include all DOCUMENTS relating to the formation of THIS DEFENDANT, all minutes of partners', general partners', or other owners' meetings and all DOCUMENTS relating to THIS DEFENDANT'S merger with, acquisition of or purchase or sale of or by any other COMPANY.

ANSWER:

Not applicable.

9. IDENTIFY YOUR custodian of Business Records.

ANSWER:

Chrysler corporation does not have a single custodian of its business records. Under current corporate policy, Chrysler's business records are generally in the custody of the department which generates the records.

10. IDENTIFY the person or persons most knowledgeable about:

- A. YOUR acquisition of RAW ASBESTOS and/or ASBESTOS-CONTAINING FRICTION PRODUCTS;
- B. YOUR use of RAW ASBESTOS and/or ASBESTOS-CONTAINING FRICTION PRODUCTS;
- C. YOUR contracting with others to do work involving use or handling of RAW ASBESTOS or ASBESTOS-CONTAINING FRICTION PRODUCTS.

ANSWER:

- A. With respect to automotive brake parts, James Knoll is knowledgeable. With respect to automotive clutch parts, John Koepele is knowledgeable.
- B. With respect to automotive brake parts, James Knoll is knowledgeable. With respect to automotive clutch parts, John Koepele is knowledgeable.
- C. Not applicable.

11. For DEFENDANTS involved in the MARKETING of ASBESTOS-CONTAINING FRICTION PRODUCTS, state the IDENTITY of physicians, medical directors and/or industrial hygienists employed by THIS DEFENDANT. All other DEFENDANTS need only respond as to medical directors and/or industrial hygienists or physicians employed in the area of employee health and safety.

1 PREMISES owners and domestic corporations need only respond as to the United
2 States only.

3 ANSWER:

4 Chrysler's Director of Occupational Health and Safety is J. E. Thomas.
5 Chrysler's Director of Industrial Hygiene is Louis P. Gendernalik.

6 12. Has any employee of THIS DEFENDANT testified by deposition or at
7 trial on behalf of THIS DEFENDANT in a third-party case, in which THIS
8 DEFENDANT was a party, wherein the plaintiff has alleged an asbestos-related
9 injury? If so, for each such third-party case please state:

- 10 A. The caption and case number;
11 B. The court filing including state and county;
12 C. The date of deposition or trial testimony;
D. The name and address of plaintiff's counsel of record;
E. The name and address of the court reporter.

13 ANSWER:

14 Yes. Chrysler can provide the following information:

15	NAME	CASE	STATE	CASE NO./DATE	RPTR.
16	Peter Heckman	Monohan	CA.	CV-086275 3/29/94	
17	James Knoll	Vaughn	MO.	82-1655-C(A) 12/8/83	Wm. Rittinger
18					
19	James Knoll	Horn	WA.	80-2-90935-3 6/15/84	Jo Anne Kippert
20					
21	James Knoll	Webb	MI.	85-514-889-NP 6/29/87	Rene Twedt
22					
23	James Knoll	Coates	NJ.	L-095651-85 9/14/88	Leslie Geiser
24					
25	James Knoll	Marcinowski	PA.	88-7410 4/26/91	Jeanne Hoyt- Christian
26					
27	James Knoll	Grewe	MD.	93167501 3/19/96	Bess Avery
28					
	Gerald Sattelmeyer	Boatnar	MI.	84-410-852-NP 7/15/86	Ramon Jones

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1	Gerald Sattelmeier	Coates	NJ.	L-095651-85 5/9/89	Lisa Traylor
2	Jack Koblin	Coates	NJ.	L-095651-85 6/14/88	Marc Brody
3	Paul Kelly, Jr.	Coates	NJ.	L-095651-85 6/14/88	Marc Brody
4	Paul Kelly, Jr.	Becker	NJ.	L-91267-85 6/15/88	Alena Lynch

13. For each of the following, please state whether THIS DEFENDANT has ever been a member or paid dues for any representative of THIS DEFENDANT to be a member of the following (please answer to the present):

- A. American Conference of Governmental Industrial Hygienists;
- B. American Industrial Hygiene Association;
- C. American Petroleum Institute;
- D. American Railroad Association;
- E. Asbestos Cement Producers Association;
- F. Asbestos Information Association (AIA);
- G. Asbestos Information Association/North America (AIA/NA);
- H. Asbestos Textile Institute (ATI);
- I. Industrial Hygiene Foundation and/or Industrial Health Foundation (IHF);
- J. Industrial Mineral Insulation Manufacturers Institute;
- K. Magnesite Insulation Manufacturers' Association;
- L. Magnesite Silica Insulation Manufacturers' Association;
- M. Mineral Wool Institute;
- N. National Insulation Manufacturers Association (NIMA);
- O. National Safety Council;
- P. New York Academy of Sciences;
- Q. Quebec Asbestos Mining Association (QAMA);
- R. Refractories Institute;
- S. Safe Building Alliance;
- T. Thermal Insulation Manufacturers Association (TIMA);
- U. U.S. Maritime Commission;
- V. IDENTIFY any other organizations, associations or group of manufacturers, miners, distributors, importers, labelers, suppliers and/or sellers of RAW ASBESTOS and/or ASBESTOS-CONTAINING FRICTION PRODUCTS of which THIS DEFENDANT was a member;
- W. IDENTIFY any such representative of THIS DEFENDANT.

ANSWER:

Chrysler has no central listing of organizations which Chrysler and/or Chrysler employees were members of from 1930 to the present. Based upon information known to date, however, Chrysler answers as follows:

- A. Not to Chrysler's present knowledge.
- B. Yes.
- C. Not to Chrysler's present knowledge.
- D. Not to Chrysler's present knowledge.
- E. Not to Chrysler's present knowledge.
- F. Not to Chrysler's present knowledge.
- G. Not to Chrysler's present knowledge.
- H. Not to Chrysler's present knowledge.
- I. Yes.
- J. Not to Chrysler's present knowledge.
- K. Not to Chrysler's present knowledge.
- L. Not to Chrysler's present knowledge.
- M. Not to Chrysler's present knowledge.
- N. Not to Chrysler's present knowledge.
- O. Yes.
- P. Not to Chrysler's present knowledge.
- Q. Not to Chrysler's present knowledge.
- R. Not to Chrysler's present knowledge.
- S. Not to Chrysler's present knowledge.
- T. Not to Chrysler's present knowledge.
- U. Not to Chrysler's present knowledge.
- V. Friction Material Standards Institute.
- W. Chrysler believes that a representative to the Friction Materials Standards Institute in 1965 was K. L. Hasselkus. Chrysler has not located company records indicating representatives to other organizations during the period at issue, if any.

14. For each organization, association or other entity identified in YOUR response to Interrogatory No. 13, please state:

- A. The dates during which THIS DEFENDANT was a member;
- B. The name(s) of any publication(s) received by THIS DEFENDANT from such association or organization;
- C. The name of any committee or subcommittee of which THIS DEFENDANT was a member and the dates of such committee or subcommittee membership.

ANSWER:

- A. Chrysler's membership in the American Industrial Hygiene Association dates from that organization's founding in the 1930s. Membership in the Industrial Hygiene Foundation is believed to have been from 1965 until 1970. National Safety Council membership is believed to have been from 1974 until 1978. Individual Chrysler employees have also held memberships in this organization at various times. Membership in the Friction Materials Standards Institute is believed to have been from circa 1965 to circa 1973.

- 1 B. Chrysler or its employees may have, at various times, received
2 the Journal of the American Council of Governmental Industrial
3 Hygienists and the Journal of the American Industrial Hygiene
4 Association. Other publications received by Chrysler or its
5 employees may have included general mailings from the
6 Asbestos Information Association, publications of the National
7 Institutes of Safety and Health (NIOSH), materials from the
8 Industrial Health Foundation, catalogs from the Friction
9 Materials Standards Institute and the Journal of Occupational
10 Medicine.
11 C. Unknown at this time.

12 15. Had THIS DEFENDANT prior to 1973 received any DOCUMENTS
13 containing results or conclusions of any studies and/or tests conducted by Bonsib
14 for Standard Oil of New Jersey relating to asbestos exposure in the workplace or
15 the human health consequences of exposure to asbestos? If so:

- 16 A. Either attach all DOCUMENTS or disks containing such data,
17 evidencing the information sought in this interrogatory and its
18 subparts to YOUR answers to these interrogatories or describe
19 such DOCUMENTS with sufficient particularity that they may be
20 made the subject of a request for production of documents.
21 B. State the date upon which THIS DEFENDANT first received such
22 DOCUMENTS;
23 C. State the IDENTITY of the custodian of such DOCUMENTS;
24 D. This interrogatory does not apply to DOCUMENTS contained in
25 a library maintained by a DEFENDANT hospital or a
26 DEFENDANT's library providing access to the general public.

27 ANSWER:

28 Chrysler has not located any corporate records, and believes none exist, as
to any studies or tests concerning asbestos exposure conducted by Bonsib
for Standard Oil of New Jersey.

16. Had THIS DEFENDANT prior to 1973 received a copy or any portion of
any studies and/or tests conducted by any insurance company, including but not
limited to Metropolitan Life Insurance Company and Aetna Insurance relating to
asbestos exposure in the workplace or the human health consequences of
exposure to asbestos? If so:

- A. Either attach all DOCUMENTS or disks containing such data,
evidencing the information sought in this interrogatory and its
subparts to YOUR answers to these interrogatories, or describe

- 1 such DOCUMENTS with sufficient particularity that they may be
2 made the subject of a request for production of documents;
3 B. State the date upon which THIS DEFENDANT first received such
4 DOCUMENTS;
5 C. State the identity of the custodian of such DOCUMENTS.
6 D. This interrogatory does not apply to DOCUMENTS contained in
7 a library maintained by a DEFENDANT hospital or a
8 DEFENDANT'S library providing access to the general public.

9 ANSWER:

10 Chrysler has not located any corporate records, and believes none exist, as
11 to any studies or tests concerning asbestos exposure conducted by any
12 insurance company, including the Metropolitan Life Insurance Company and
13 Aetna Insurance.

14 17. Had THIS DEFENDANT prior to 1973 received any DOCUMENTS
15 containing results or conclusions of any studies and/or tests conducted by any
16 laboratory, including but not limited to the Sacranac Laboratory relating to
17 asbestos exposure in the workplace or the human health consequences of
18 exposure to asbestos? If so:

- 19 A. Either attach all DOCUMENTS or disks containing such data,
20 evidencing the information sought in this interrogatory and its
21 subparts to YOUR answers to these interrogatories or describe
22 such DOCUMENTS with sufficient particularity that they may be
23 made the subject of a request for production of documents;
24 B. State the date upon which THIS DEFENDANT first received such
25 DOCUMENTS;
26 C. State the IDENTITY of the custodian of such DOCUMENTS;
27 D. This interrogatory does not apply to DOCUMENTS contained in
28 a library maintained by a DEFENDANT hospital or a
DEFENDANT'S library providing access to the general public.

ANSWER:

Chrysler has not located any corporate records, and believes none exist, as
to any studies or tests concerning asbestos exposure conducted by the
Saranac Laboratory.

18. State whether THIS DEFENDANT has ever maintained a library (or
libraries) which contains books, articles, periodicals, journals and/or reference
materials that relate to the subjects of asbestos, industrial hygiene, medicine,
safety, and/or occupational disease. If so, state:

- 1 A. The date each such library was established;
2 B. The location of each such library;
3 C. The IDENTITY of each librarian or other person in charge of such
library.

4 **ANSWER:**

5 The industrial hygiene department, the engineering department, the medical
6 department and other departments at Chrysler have maintained reference
libraries in a variety of locations. Chrysler does not maintain a library solely
related to asbestos, although certain literature maintained in these
departments may relate to asbestos.

- 7 A. Chrysler has not located records sufficient to identify when each
8 of these libraries was established.
9 B. The industrial hygiene department, the engineering department,
10 the medical department and other departments at Chrysler have
maintained reference libraries in a variety of locations. Chrysler
currently maintains a technical library at the Chrysler
11 Technological Center in Auburn Hills, Michigan.
12 C. Chrysler has not located records sufficient to identify each
librarian or other person in charge of the various departmental
libraries. The person currently in charge of Chrysler's technical
library in Auburn Hills, Michigan, is Barbara M. Fronczak.

13
14 19. With the exception of OSHA compliance, had THIS DEFENDANT prior
15 to 1980 exchanged DOCUMENTS or communicated with any individual or other
16 COMPANY expressly regarding the results of tests and/or studies relating to
17 asbestos exposure in the workplace or the human health consequences of
18 exposure to asbestos? If so, state:

- 19 A. Each individual or COMPANY with whom the information was
20 exchanged or to whom it was communicated;
21 B. The date(s) of any such exchanges or communications;
C. The IDENTITY of the custodian of such documents.

22 **ANSWER:**

23 Chrysler has not located any records indicating that it sent to or received
24 from other entities any communications "expressly regarding the results of
tests and/or studies relating to asbestos exposure in the workplace or the
human health consequences of exposure to asbestos".

25 20. Has any employee or designee of THIS DEFENDANT testified on behalf
26 of THIS DEFENDANT before the Occupational Safety and Health Administration,
27 the National Institute of Occupational Health and Safety or any committee or
28 subcommittee of the United States Congress relating to asbestos exposure in the

1 workplace or the human health consequences of exposure to asbestos? If so,
2 please state:

- 3 A. The entity before whom such testimony was given;
4 B. The date(s) and location of such testimony;
5 C. The IDENTITY of the individual(s) who so testified;
6 D. Whether any DOCUMENTS were presented to the entity before
7 which testimony was given;
8 E. Whether copies of DOCUMENTS presented were retained by
9 THIS DEFENDANT and, if so, state the IDENTITY of the
10 custodian of such DOCUMENTS.

11 ANSWER:

12 Chrysler has not located any records and is otherwise not aware of any
13 testimony such as described in this interrogatory.

14 21. Has THIS DEFENDANT conducted or caused to be conducted, tests
15 and/or studies of ambient asbestos dust created during the manufacture,
16 processing and/or assembling for sale of ASBESTOS-CONTAINING FRICTION
17 PRODUCTS? If so, state:

- 18 A. Each manufacturing facility, including location and address, at
19 which any such test and/or study was conducted;
20 B. The date of each such test and/or study;
21 C. The individual(s) or entity conducting each such test and/or
22 study;
23 D. Whether THIS DEFENDANT has any DOCUMENTS containing
24 the results and/or conclusions of each such study;
25 E. The IDENTITY of the custodian of such DOCUMENTS.

26 ANSWER:

27 Chrysler is in possession of records of measurements of ambient asbestos
28 dust which were made by Chrysler personnel at various locations within
Chrysler's Trenton Chemical facility, at various times during the period from
1965 through 1985 and after. Also, air sampling was conducted at other
Chrysler facilities where asbestos containing automotive brake parts were
assembled, including Chrysler's Detroit Axle facility (rear brake assemblies)
and Toledo Machining plant (front disc brake assemblies).

29 22. Has THIS DEFENDANT conducted or caused to be conducted, any
30 tests and/or studies on ambient asbestos dust levels at any location or job site
31 where ASBESTOS-CONTAINING FRICTION PRODUCTS were installed, utilized or
32 removed? If so, for the first five (5) tests and/or studies, state:

- 1 A. The location, including name and address, at which each such
2 test and/or study was conducted;
3 B. The individual(s) or entity conducting each such test and/or
4 study;
5 C. The date of each such test and/or study;
6 D. Whether THIS DEFENDANT has any DOCUMENTS containing
7 the results and/or conclusions of each such test and/or study;
8 E. The IDENTITY of the custodian of such DOCUMENTS.

9 **ANSWER:**

10 Chrysler is not aware of any such "tests and/or studies" except as described
11 in response to Interrogatory No. 21.

12 23. Did THIS DEFENDANT have any laboratory or other similar type of
13 facility anywhere in the United States at which it conducted or caused to be
14 conducted, any tests and/or studies of ASBESTOS-CONTAINING FRICTION
15 PRODUCTS or RAW ASBESTOS relating to the health consequences of asbestos
16 or the dust generated by any use of asbestos or ASBESTOS-CONTAINING
17 FRICTION PRODUCTS. If so, state:

- 18 A. The location, including name and address, at which each test
19 and/or study was conducted;
20 B. The individual(s) or entity conducting each such test and/or
21 study;
22 C. The date of each such test and/or study;
23 D. Whether THIS DEFENDANT has any DOCUMENTS containing
24 the results and/or conclusions of each such test and/or study;
25 E. The IDENTITY of the custodian of such DOCUMENTS.

26 **ANSWER:**

27 No.

28 24. Has THIS DEFENDANT made available to its employees a medical
examination program to determine the absence or presence of asbestos-related
disease? If so, state:

- A. Whether chest x-rays or pulmonary function tests were part of
such program(s);
B. Whether participation in any such program was a mandatory
condition of employment or was voluntary;
C. Whether THIS DEFENDANT has DOCUMENTS of such
program(s);
D. The IDENTITY of the custodian of such DOCUMENTS.

ANSWER:

Yes. Medical examinations were available to employees.

- A. Chest X-rays and/or pulmonary function tests were included to the extent mandated by Occupational Safety and Health Administration requirements.
- B. Employees could refuse medical testing.
- C. Yes.
- D. A written medical procedure is on file in Chrysler's corporate medical department.

25. Prior to 1973, did any person file a Workers' Compensation claim for asbestos-related injury against THIS DEFENDANT or any Workers' Compensation carrier for THIS DEFENDANT which provided coverage for THIS DEFENDANT? If so, for the first 50 such claims state:

- A. The date of such claim;
- B. The name of the claimant;
- C. The case number;
- D. The court in which the claim was filed;
- E. The IDENTITY of this defendant's custodian of DOCUMENTS evidencing such claims.

ANSWER:

Chrysler is not aware of any asbestos-related Worker's Compensation claims prior to 1973. Chrysler notes that it does not nor has it ever categorized its documents regarding workers compensation claims according to the type of injury to its employees.

26. Does THIS DEFENDANT have insurance available to cover judgment(s) entered against it in asbestos-related personal injury lawsuits? If so, state:

- A. The name and principal place of business of any insurance carrier who has issued such policy of insurance;
- B. The number and effective date of each policy;
- C. The amount(s) of coverage of each policy;
- D. The applicable dates of coverage.

ANSWER:

Chrysler was insured by the Hartford Insurance Company from 1926 through 1972. There were separate policies for each year. Chrysler has been self-insured subsequent to 1972.

1 27. State whether YOU have controlled, purchased or in any way acquired
2 any interest in any corporation or business entity which has mined, manufactured,
3 produced, processed, compounded, sold, supplied, distributed and/or otherwise
4 placed RAW ASBESTOS or ASBESTOS-CONTAINING FRICTION PRODUCTS in the
5 stream of commerce and, if so, state:

- 6 A. The name and address of said corporation or business entity;
7 B. The dates YOU controlled, purchased or acquired any interest;
8 C. The nature of the business as it pertains to asbestos.

8 ANSWER:

9 In the period from 1930 through 1985, Chrysler did not purchase or
10 otherwise acquire an interest in any company which "mined, manufactured,
11 [or] produced...RAW ASBESTOS."

12 Through various transactions at times during the period from 1930 to 1985,
13 Chrysler has had an interest in foreign automakers, whose vehicles also may
14 have been equipped with asbestos containing automotive brake and/or clutch
15 parts. Some of the vehicles made by foreign makers in which Chrysler had
16 an interest may have been placed in the stream of commerce in the United
17 States.

18 Chrysler purchased a 25% interest in Simca of France in 1958, obtained
19 controlling interest (69%) by 1964, which increased to 77% by the time
20 Chrysler sold all its Simca holdings in 1978 (Simca was at that time known
21 as Chrysler France). Some Simca cars were imported by Chrysler into the
22 United States beginning in 1958 and sold through Chrysler dealers at that
23 time.

24 Chrysler purchased an interest in the Rootes Group of Great Britain in the
25 early 1960's, which increased to 83% by the time Chrysler sold its holdings
26 in 1978 (Rootes was at that time known as Chrysler United Kingdom).
27 Some Rootes cars were imported by Chrysler into the United States and sold
28 through Chrysler dealers, including the Sunbeam Tiger and the Plymouth
Cricket.

Chrysler acquired a 15% interest in Mitsubishi of Japan in 1971, with further
acquisitions of 10% in 1972 and another 10% in 1973. Chrysler sold its
Mitsubishi holdings in 1991. During the period through 1985, some
Mitsubishi vehicles were imported by Chrysler into the United and sold
through Chrysler dealers, including Dodge and Plymouth Colt and Colt Vista
models, Plymouth Arrow, Plymouth Conquest, and Dodge Ram 50 compact
pickup trucks.

28 28. If THIS DEFENDANT entered into any agreements for the rebranding of
any ASBESTOS-CONTAINING FRICTION PRODUCTS by THIS DEFENDANT for
resale or distribution by another person or entity, describe each agreement's terms

1 ANSWER:**2 No.**

3

4 31. Between the years 1930 to 1985, did YOU sell any ASBESTOS-

5 CONTAINING FRICTION PRODUCT line to another person or entity? If so, state

6 for each such sale:

- 7 A. Date of sale;**
- 8 B. Terms of sales agreement;**
- 9 C. Either attach all DOCUMENTS or disks containing such data,**
- 10 D. Trade, brand and/or generic name of each such product line**
- 11 E. Name of person or entity to whom YOU sold and the type of**
- 12 F. Location of any manufacturing facilities so sold and type of**
- 13 ASBESTOS-CONTAINING FRICTION PRODUCTS manufactured**
- therein.**

14 ANSWER:**15 No.**

16

17 32. IDENTIFY all brochures, pamphlets, catalogs or other advertising

18 relating to ASBESTOS-CONTAINING FRICTION PRODUCTS and/or RAW

19 ASBESTOS which YOU manufactured, sold, distributed or supplied from the year

20 1930 to 1985. For each such document, state:

- 21 A. A description of the document;**
- 22 B. The year it was printed;**
- 23 C. The period of time in which it was used;**
- 24 D. The purpose of said document;**
- 25 E. Whether the documents or copies of said document presently**
- exist;**
- 26 F. If said documents or copies still exist, where they are located;**
- 27 G. The IDENTITY of the custodian of such documents.**

28 ANSWER:

For the period from 1930 through 1985, Chrysler is not in possession of any

brochures, pamphlets, catalogs or other advertising relating to raw asbestos,

nor any such documents which refer explicitly to asbestos. Chrysler is in

possession of some printed materials promoting Chrysler's Cyclebond brake

linings, from the 1950's. These materials are in Chrysler's possession.

1 Chrysler is not aware of any other Chrysler materials promoting asbestos
2 containing automotive brake or clutch parts.

3
4 33. When do YOU contend THIS DEFENDANT first became aware that
5 there is an association between asbestos exposure and disease in human beings?

6 ANSWER:

7 Exposure to asbestos does not, as this Interrogatory suggests, lead to
8 disease in humans under all circumstances. A number of different factors
9 must, in each case, be considered in determining whether this potential
10 exists. Such factors include, but are not limited to, the type of asbestos, the
11 length of the asbestos fiber, the duration of exposure, the dose or
12 concentration of the exposure, the respirability of the fiber, the person
13 exposed and the circumstances surrounding the exposure, including the use
14 of available protective devices.

15 Chrysler does not acknowledge a causal relationship between exposure to
16 brake dust or clutch facing dust and disease or illness. Chrysler was aware,
17 in the 1930s, that certain types of raw asbestos (such as those used in
18 insulation products), if inhaled in large quantities, could cause or contribute
19 to pulmonary disease. This awareness, however, is not applicable to
20 automotive brake and clutch parts.

21
22 34. How do YOU contend THIS DEFENDANT first became aware that
23 there is an association between asbestos exposure and disease in human beings?

24 ANSWER:

25 Chrysler does not acknowledge a causal relationship between exposure to
26 brake dust or clutch facing dust and disease or illness. See answer to
27 Interrogatory number 33. Chrysler does not have records sufficient to
28 specifically state the manner in which it first became aware of all of the
information contained in its answer to Interrogatory number 33. Chrysler
assumes such information was largely and most likely derived from published
materials in the public domain.

35. Either attach all DOCUMENTS or disks containing such data,
evidencing the information upon which YOUR contentions in Interrogatory Nos. 34
and 35 [sic., 33 and 34] are based or describe such DOCUMENTS with sufficient
particularity that they may be made the subject of a request for production of
documents.

1 **ANSWER:**

2 The information provided in these responses is based on a variety of sources,
3 including published materials in the public domain. Other sources include the
4 opinions of experts, including those specifically retained for the purposes of
litigation.

5 36. When did YOU first warn YOUR employees that exposure to asbestos
6 could be hazardous to human health? State:

- 7 A. Whether the first such warning was written or oral;
8 B. Whether copies of DOCUMENTS containing such warning exist;
9 C. The IDENTITY of the custodian of such DOCUMENTS;
D. The content of the warning.

9 **ANSWER:**

10 Chrysler does not acknowledge a causal relationship between exposure to
11 brake dust or clutch facing dust and disease or illness. Chrysler believes
12 certain persons were aware of an alleged relationship between exposure to
13 other asbestos forms and various health conditions by way of information
14 generally available in the public domain. Chrysler has been unable to locate
records that would enable it to state when information concerning asbestos
first became a topic of employee communications, but Chrysler dissemination
of cautionary information began in the 1970s.

15 37. Did YOU ever issue a written COMPANY policy discontinuing warning
16 YOUR employees that exposure to asbestos could be hazardous to human health?

17 If so:

- 18 A. Provide the date;
19 B. Describe the circumstances;
20 C. Either attach all DOCUMENTS or disks containing such data,
21 evidencing the information sought in this interrogatory and its
subparts to YOUR answers to these interrogatories or describe
such DOCUMENTS with sufficient particularity that they may be
made the subject of a request for production of documents.

22 **ANSWER:**

23 No.

24
25 38. At any time between 1930 and 1985, did YOU import, export, ship,
26 transship or otherwise transport RAW ASBESTOS into, out of or through any port
27 in the GEOGRAPHIC AREA? If so, for each occasion:

- 28 A. IDENTIFY and describe the NATURE and amount of RAW

ASBESTOS;

- B. IDENTIFY the ship or ships (including the owners and operators thereof) onto or from which the RAW ASBESTOS was loaded, unloaded or transshipped;
- C. State the dates, port and pier involved for each occasion;
- D. Either attach all DOCUMENTS or disks containing such data, evidencing the information sought in this interrogatory and its subparts to YOUR answers to these interrogatories or describe such DOCUMENTS with sufficient particularity that they may be made the subject of a request for production of documents.

ANSWER:

No.

39. Did YOU or any of YOUR predecessors-in-interest manufacture any of the following products which contained ASBESTOS-CONTAINING FRICTION PRODUCTS at any time between 1930 and 1985:

- A. Automobiles;
- B. Light duty trucks;
- C. Heavy duty trucks or trailers;
- D. Buses/coaches;
- E. Motorcycles;
- F. Winches, drilling rig or other stationary machinery;
- G. Aircraft;
- H. Rubber-tired crawler, construction or farm equipment;
- I. Railed engines or cars including light-railed vehicles;
- J. Ships;
- K. Off-road vehicles;
- L. Fork lifts;
- M. Other machinery or equipment (please describe).

ANSWER:

- A. Yes.
- B. Yes.
- C. Yes.
- D. Yes.
- E. No.
- F. No.
- G. No.
- H. No.
- I. No.
- J. No.
- K. Yes (Chrysler made 4-wheel drive multipurpose passenger vehicles capable of being driven on-road and off-road).
- L. No.
- M. Chrysler is uncertain what is intended to be included in the term "other machinery or equipment", but believes that items A through L include those Chrysler products that would have

1 L. Chrysler is uncertain what is intended to be included in the term
2 "other uses", but believes that items A through K include those
3 Chrysler products that would have potentially utilized
4 automotive brake parts.

43. For each use identified in Interrogatory No. 42, state:

- 5 A. The trade, brand and generic name by which the product was
6 known from 1930 to 1985;
7 B. The date(s) YOU:
8 1. began MARKETING the product;
9 2. ceased to MARKET the product;
10 3. recalled the product from the market, if ever as a result of
11 asbestos-related health concerns, if any;
12 C. A description of the type and grade of RAW ASBESTOS in the
13 ASBESTOS-CONTAINING FRICTION PRODUCT and the range of
14 asbestos fiber by percentage of weight in each such
15 ASBESTOS-CONTAINING FRICTION PRODUCT for each year
16 between 1930 and 1985, inclusive;
17 D. A general description of the physical appearance and NATURE
18 of each type of ASBESTOS-CONTAINING FRICTION PRODUCT
19 including any generally used method of identification of the
20 product such as distinctive markings and/or logos and the date,
21 inclusive, during which they appeared. In addition to describing
22 the distinctive markings and/or logos, please IDENTIFY the
23 manufacturer or distributor of each type of ASBESTOS-
24 CONTAINING FRICTION PRODUCT;
25 E. IDENTIFY the suppliers of the RAW ASBESTOS used in each
26 type of ASBESTOS-CONTAINING FRICTION PRODUCT and the
27 time period of supply;
28 F. The purpose for the inclusion of asbestos in each type of
ASBESTOS-CONTAINING FRICTION PRODUCT (e.g., binding
agent, fire retardant, etc.);
G. The type of shipping package and the range of shipping package
dimensions, if not solid, and the inclusive period of time during
which YOU used each such container, package or carton;
H. A detailed description of any printed material or trademark
appearing on each type of container, package or carton
identified in G above and the inclusive period of time during
which each such combination of printed material and trademark
was used;
I. A detailed description of any written instructions, wrapping or
printed insert which was or is placed in the container, package
or carton with each such product and the inclusive period of
time during which each instruction, wrapping or printed insert
was placed in the container, package or carton;
J. Whether or not YOU have in YOUR possession or under YOUR
control samples or exemplars of 1) each container, package or
carton; 2) each printed material or trademark appearing thereon;
or 3) each written instruction, wrapping or printed insert
mentioned in YOUR response to G, H and I above.

- 1 K. Did YOU place edge codes on the ASBESTOS-CONTAINING
2 FRICTION PRODUCTS YOU MARKETED and, if so, during what
3 period of time?
4 L. Either attach all DOCUMENTS or disks containing such data,
5 evidencing the information sought in this interrogatory and its
6 subparts to YOUR answer to these interrogatories or describe
7 such DOCUMENTS with sufficient particularity that they may be
8 made the subject of a request for production of documents;
9 M. IDENTIFY the person(s) presently most knowledgeable about the
10 information sought in this interrogatory or its subparts.

11 ANSWER:

- 12 A. Chrysler has sold motor vehicles identified as "Chrysler,"
13 "Plymouth," "DeSoto" and "Dodge" with original equipment
14 asbestos containing automotive brake parts.
15 Chrysler service parts, including brake parts, have been sold
16 under the trade names Mopar, Cycle-Weld, and Cycle-Bond.
17 B. 1. Chrysler has assembled and sold motor vehicles and
18 service parts, including brake parts, since 1925.
19 2. Chrysler continued to assemble motor vehicles and to sell
20 vehicles and service parts for those vehicles, including
21 brake parts, through at least 1985.
22 3. Chrysler did not recall any of its products from the market
23 as a result of asbestos-related health concerns.
24 C. Brake linings manufactured by Chrysler at its Trenton Chemical
25 plant contained 50 percent chrysotile by weight. The other 50
26 percent of the brake linings manufactured by Chrysler contained
27 a 50 percent matrix. Further information regarding the
28 composition of Chrysler's brake parts constitutes confidential
and proprietary trade secrets. Chrysler does not have
information regarding the specific compositions of the asbestos
containing automotive brake parts purchased from outside
suppliers.
D. Chrysler placed indented identification marks on its brake
linings. Each brake lining was marked on its edge with a 2-
letter designation indicating the name of the manufacturer of the
lining, a combination of letters "FE" or "EE", followed by
numbers indicating the friction level of the lining when normal or
hot, and followed by four digits indicating calendaring for date
of manufacture. As a new product, the finished materials are
date coded and identified by manufacturer. After the product is
used, it becomes worn and, therefore, indistinguishable. The
Chrysler logo is a five-pointed star inscribed inside a pentagon,
referred to as the "pentastar". The emblem was stamped on
the brake shoes and brake support plate produced by Chrysler.
For identification purposes, color indentation appeared on the
lining perpendicular to the friction surface. Chrysler has not
located documentation sufficient to allow it to describe
markings on parts obtained from outside suppliers.
At least since 1959, the suppliers of asbestos containing
automotive brake parts for Chrysler motor vehicles were the
following: Abex Corp., Raybestos-Manhattan, Johns-Manville
Corp. and Bendix Corporation Friction Material Division.

CROSBY, F. EY, ROACH & MAY
PROFESSIONAL CORPORATION

- 1 E. Chrysler purchased chrysotile asbestos fiber from Asbestos
2 Corporation, Limited, 830 Mooney Street, Bentford Mines,
3 Quebec, Canada G6651; Carry Canadian, P.O. Box 190, East
4 Braughton Station PQ Canada G0N1H0; Johns-Manville, P.O.
5 Box 5108, Ken Caryl Ranch, Denver, Colorado 80217. A minor
6 supplier of raw asbestos was Lake Asbestos.
- 7 F. Chrysler does not keep records as to the reason asbestos was
8 utilized in its products. In general, however, asbestos is utilized
9 in friction products because it provides suitable friction,
10 strength, binding, stability, heat resistance, and other
11 characteristics required to obtain proper performance.
- 12 G. Chrysler has sold automobiles with brake parts already installed
13 in the vehicles. Vehicles are generally not shipped in packages.
14 With respect to after-market products, they were shipped in
15 cardboard cartons of various sizes.
- 16 H. Chrysler has not been able to locate records sufficient to provide
17 the "detailed description" of packaging materials sought in this
18 interrogatory. Chrysler brake parts have been sold under the
19 trade names Mopar, Cycle-Weld, and Cycle-Bond. See also
20 answer to subpart I of this interrogatory.
- 21 I. Chrysler has not been able to locate records sufficient to provide
22 the "detailed description" of written materials accompanying the
23 sale of automotive brake parts sought in this interrogatory.
24 Chrysler can state, however, that owners' manuals containing
25 information concerning vehicle use and operation have been
26 provided in connection with new vehicle sales.
27 To the extent this subpart seeks information regarding warnings
28 or cautionary language, see answer to Interrogatory number 57.
- 29 J. Chrysler may be in possession of some such exemplar materials
30 in its parts distribution system.
- 31 K. Chrysler placed indented identification marks on its brake
32 linings. Each brake lining was marked on its edge with a 2-
33 letter designation indicating the name of the manufacturer of the
34 lining, a combination of letters "FE" or "EE", followed by
35 numbers indicating the friction level of the lining when normal or
36 hot, and followed by four digits indicating calendaring for date
37 of manufacture. As a new product, the finished materials are
38 date coded and identified by manufacturer. After the product is
39 used, it becomes worn and, therefore, indistinguishable. The
40 Chrysler logo is a five-pointed star inscribed inside a pentagon,
41 referred to as the "pentastar". The emblem was stamped on
42 the brake shoes and brake support plate produced by Chrysler.
43 For identification purposes, color indentation appeared on the
44 lining perpendicular to the friction surface. Chrysler has not
45 located documentation sufficient to allow it to describe
46 markings on parts obtained from outside suppliers.
- 47 L. With respect to Chrysler's response to subpart F of this
48 interrogatory, Chrysler is in possession of some in-house
49 literature which does not refer explicitly to asbestos, but which
50 describes the utility of then conventional (asbestos containing)
51 brake linings when compared, for example, to metallic brake
52 linings.
- 53 M. With respect to after market sales, advertising, and distribution,
54 Paul Kelly is knowledgeable. With respect to labeling, Paul Kelly
55 and Jack Koblin are knowledgeable. With respect to brake

product evaluation, research, and development, James Knoll is knowledgeable.

44. Did YOU or any of YOUR predecessors-in-interest MARKET clutch facings, clutch plates or automatic transmission plates for any of the uses listed below at any time between 1930 and 1985?

- A. Automobiles or light duty trucks;
- B. Heavy duty trucks or trailers;
- C. Buses or coaches;
- D. Motorcycles;
- E. Winches, drilling rigs or other stationary machinery;
- F. Aircraft;
- G. Rubber tired crawlers, construction or farm equipment;
- H. Railed engines or cars including light railed vehicles;
- I. Shipboard;
- J. Off-road vehicles;
- K. Forklifts;
- L. Other uses.

ANSWER:

- A. Yes.
- B. Yes.
- C. Yes.
- D. No.
- E. No.
- F. No.
- G. No.
- H. No.
- I. No.
- J. Yes (Chrysler made 4-wheel drive multipurpose passenger vehicles capable of being driven on-road and off-road).
- K. No.
- L. Chrysler is uncertain what is intended to be included in the term "other uses", but believes that items A through K include those Chrysler products that would have potentially utilized automotive clutch parts.

45. For each use identified in Interrogatory No. 44, state:

- A. The trade, brand and generic name by which the product was known from 1930 to 1985;
- B. The date(s) YOU:
 - 1. began MARKETING the product;
 - 2. ceased to MARKET the product;
 - 3. recalled the product from the market, if ever, as a result of asbestos-related health concerns, if any;
- C. A description of the type and grade of RAW ASBESTOS in the ASBESTOS-CONTAINING FRICTION PRODUCT and the range of asbestos fiber by percentage of weight in each such ASBESTOS-CONTAINING FRICTION PRODUCT for each year

1 46. Did YOU or any of YOUR predecessors-in-interest MARKET any
2 ASBESTOS-CONTAINING FRICTION PRODUCTS to any ORIGINAL EQUIPMENT
3 MANUFACTURER? If so, IDENTIFY each ORIGINAL EQUIPMENT
4 MANUFACTURER to whom YOU MARKETING ASBESTOS-CONTAINING FRICTION
5 PRODUCTS and as to each ORIGINAL EQUIPMENT MANUFACTURER, IDENTIFY
6 the ASBESTOS-CONTAINING FRICTION PRODUCT that YOU MARKETING to them
7 and the inclusive years that YOU did so.

- 8 A. Either attach all DOCUMENTS or disks containing such data,
9 evidencing the information sought in this interrogatory and its
10 subparts to YOUR answer to these interrogatories or describe
11 such DOCUMENTS with sufficient particularity that they may be
12 made the subject of a request for production of documents;
13 B. IDENTIFY the person(s) presently most knowledgeable about the
14 information sought in this interrogatory or its subparts.

15 ANSWER:

16 No.

17 47. Did YOU or any of YOUR predecessors-in-interest MARKET any
18 ASBESTOS-CONTAINING FRICTION PRODUCTS to any PRIVATE BRAND
19 ACCOUNT CUSTOMER? If so, for each PRIVATE BRAND ACCOUNT CUSTOMER,
20 IDENTIFY and describe the NATURE of the produce MARKETING to that PRIVATE
21 BRAND ACCOUNT CUSTOMER, the inclusive dates thereof and, if known, the
22 name(s) under which the PRIVATE BRAND ACCOUNT CUSTOMER MARKETING
23 the product.

- 24 A. DESCRIBE to the best of YOUR knowledge how the PRIVATE
25 BRAND ACCOUNT CUSTOMER MARKETING the product which
26 YOU sold or distributed to it;
27 B. Either attach all DOCUMENTS or disks containing such data,
28 evidencing the information sought in this interrogatory or its
 subparts to YOUR answers to these interrogatories or describe
 such DOCUMENTS with sufficient particularity that they may be
 made the subject of a request for production of documents;
 C. IDENTIFY the person(s) presently most knowledgeable about the
 information sought in this interrogatory or its subparts.

ANSWER:

No.

48. Did YOU or any of YOUR predecessors-in-interest MARKET any ASBESTOS-CONTAINING FRICTION PRODUCTS to any AFTER MARKET or REPLACEMENT PART RETAILER operating 10 or more stores in the GEOGRAPHIC AREA? If so, IDENTIFY each AFTER MARKET or REPLACEMENT PART RETAILER in the GEOGRAPHIC AREA and for each please state:

- A. The inclusive years during which YOU MARKETING products to said AFTER MARKET or REPLACEMENT PART RETAILER;
- B. IDENTIFY the ASBESTOS-CONTAINING FRICTION PRODUCTS which YOU MARKETING to the AFTER MARKET or REPLACEMENT PART RETAILER;
- C. Either attach all DOCUMENTS or disks containing such data, evidencing the information sought in this interrogatory and its subparts to YOUR answers to these interrogatories or describe such DOCUMENTS with sufficient particularity that they may be made the subject of a request for production of documents;
- D. IDENTIFY the person(s) presently most knowledgeable about the information sought in this interrogatory or its subparts.

ANSWER:

No. At various times between 1930 and 1985 Chrysler or its predecessors distributed asbestos containing automotive brake and clutch replacement parts to its dealers under the Mopar, Cycle-Weld and/or Cycle-Bond trade names. Chrysler does not believe that any such dealer operated ten (10) or more sales locations for such parts in the geographic area.

49. Did YOU or any of YOUR predecessors-in-interest MARKET any ASBESTOS-CONTAINING FRICTION PRODUCTS to any warehouse distributor who MARKETING the product under YOUR name in the GEOGRAPHIC AREA? If so, IDENTIFY each warehouse distributor who MARKETING the product under YOUR name in GEOGRAPHIC AREA and for each state:

- A. The inclusive years during which YOU MARKETING ASBESTOS-CONTAINING FRICTION PRODUCTS to said warehouse distributor who distributed the product under YOUR name;
- B. IDENTIFY the ASBESTOS-CONTAINING FRICTION PRODUCTS which YOU MARKETING to the warehouse distributor who distributed the products under YOUR name;
- C. Either attach all DOCUMENTS or disks containing such data,

- 1 evidencing the information sought in this interrogatory and its
2 subparts to YOUR answers to these interrogatories or describe
3 such DOCUMENTS with sufficient particularity that they may be
4 made the subject of a request for production of documents;
5 D. IDENTIFY the person(s) presently most knowledgeable about the
6 information sought in this interrogatory or its subparts.

7 ANSWER:

8 Until 1981, Chrysler distributed asbestos containing automotive brake and
9 clutch replacement parts under the Mopar, Cycle-Weld and/or Cycle-Bond
10 trade names to independent warehouse distributors. Chrysler does not
11 maintain records sufficient to allow identification of such independent
12 warehouse distributors in the geographic area for the years prior to 1981.
13 Chrysler will make available at a mutually agreeable time and place those
14 portions of a list of independent warehouse distributors for the year 1981
15 which includes those located in the geographic area.

- 16 A. Chrysler does not maintain records sufficient to allow
17 identification of the inclusive dates that such parts were
18 distributed to such independent warehouse distributors in the
19 geographic area.
20 B. Chrysler does not maintain records sufficient to allow
21 identification of specific asbestos containing automotive brake
22 and clutch replacement parts distributed to such independent
23 warehouse distributors in the geographic area.
24 C. Chrysler will make available at a mutually agreeable time and
25 place those portions of a list of independent warehouse
26 distributors for the year 1981 which includes those located in
27 the geographic area.
28 D. Paul Kelly is knowledgeable regarding the distribution of
replacement parts.

50. Did YOU or any of YOUR predecessors-in-interest MARKET any
ASBESTOS-CONTAINING FRICTION PRODUCTS to any warehouse distributor
who MARKETING YOUR ASBESTOS-CONTAINING FRICTION PRODUCTS under a
name other than YOURS in the GEOGRAPHIC AREA? If so, IDENTIFY each
warehouse distributor who MARKETING YOUR ASBESTOS-CONTAINING
FRICTION PRODUCTS under a name other than YOURS in the GEOGRAPHIC
AREA and for each please state:

- A. The inclusive years during which YOU MARKETING ASBESTOS-
CONTAINING FRICTION PRODUCTS through said warehouse
distributor;
B. IDENTIFY the products which YOU MARKETING through the
warehouse distributor and for each the name under which the
warehouse distributed MARKETING the product;
C. Either attach all DOCUMENTS or disks containing such data,

- 1 evidencing the information sought in this interrogatory and its
2 subparts to YOUR answers to these interrogatories or describe
3 such DOCUMENTS with sufficient particularity that they may be
4 made the subject of a request for production of documents;
5 D. IDENTIFY the person(s) presently most knowledgeable about the
6 information sought in this interrogatory or its subparts.

7 ANSWER:

8 See answer to Interrogatory number 49.

9 51. Did YOU or any of YOUR predecessors-in-interest MARKET any
10 ASBESTOS-CONTAINING FRICTION PRODUCTS to any retailer operating 10 or
11 more stores in the GEOGRAPHIC AREA who sold ASBESTOS-CONTAINING
12 FRICTION PRODUCTS under YOUR name in the GEOGRAPHIC AREA? If so,
13 IDENTIFY each retailer who sold ASBESTOS-CONTAINING FRICTION PRODUCTS
14 under YOUR name in the GEOGRAPHIC AREA and for each state:

- 15 A. The inclusive years during which YOU MARKETING ASBESTOS-
16 CONTAINING FRICTION PRODUCTS to said retailer who sold
17 the product under YOUR name;
18 B. Please identify the ASBESTOS-CONTAINING FRICTION
19 PRODUCTS which YOU MARKETING to the retailer who sold the
20 product under YOUR name;
21 C. Either attach all DOCUMENTS or disks containing such data,
22 evidencing the information sought in this interrogatory and its
23 subparts to YOUR answers to these interrogatories or describe
24 such DOCUMENTS with sufficient particularity that they may be
25 made the subject of a request for production of documents;
26 D. IDENTIFY the person(s) presently most knowledgeable about the
27 information sought in this interrogatory or its subparts.

28 ANSWER:

No. At various times between 1930 and 1985 Chrysler or its predecessors distributed asbestos containing automotive brake and clutch replacement parts to its dealers under the Mopar, Cycle-Weld and/or Cycle-Bond trade names. Chrysler does not believe that any such dealer operated ten (10) or more sales locations for such parts in the geographic area.

52. Did YOU or any of YOUR predecessors-in-interest MARKET any ASBESTOS-CONTAINING FRICTION PRODUCTS to any retailer operating 10 or more stores in the GEOGRAPHIC AREA who MARKETING the product under any other name in the GEOGRAPHIC AREA? If so, IDENTIFY each retailer who MARKETING the product under any other name in the GEOGRAPHIC AREA and for

1 each state:

- 2 A. The inclusive years during which YOU MARKETED products
3 through said retailer;
- 4 B. IDENTIFY the products which YOU MARKETED through each
5 retailer and, for each, the name under which the retailer
6 MARKETED the product;
- 7 C. Either attach all DOCUMENTS or disks containing such data,
8 evidencing the information sought in this interrogatory and its
9 subparts to YOUR answers to these interrogatories or describe
10 such DOCUMENTS with sufficient particularity that they may be
11 made the subject of a request for production of documents;
- 12 D. IDENTIFY the person(s) presently most knowledgeable about the
13 information sought in this interrogatory or its subparts.

14 ANSWER:

15 No. At various times between 1930 and 1985 Chrysler or its predecessors
16 distributed asbestos containing automotive brake and clutch replacement
17 parts to its dealers under the Mopar, Cycle-Weld and/or Cycle-Bond trade
18 names. Chrysler does not believe that any such dealer operated ten (10) or
19 more sales locations for such parts in the geographic area.

20 53. Did YOU or any of YOUR predecessors-in-interest MARKET any
21 ASBESTOS-CONTAINING FRICTION PRODUCTS to any FABRICATOR OF
22 ORIGINAL EQUIPMENT PARTS? If so, IDENTIFY each FABRICATOR OF
23 ORIGINAL EQUIPMENT PARTS to whom YOU MARKETED products and as to
24 each FABRICATOR OF ORIGINAL EQUIPMENT PARTS, state:

- 25 A. The inclusive years during which YOU MARKETED said products
26 to each FABRICATOR OF ORIGINAL PARTS;
- 27 B. IDENTIFY each product YOU MARKETED to each FABRICATOR
28 OF ORIGINAL PARTS;
- 29 C. Either attach all DOCUMENTS or disks containing such data,
30 evidencing the information sought in this interrogatory and its
31 subparts to YOUR answers to these interrogatories or describe
32 such DOCUMENTS with sufficient particularity that they may be
33 made the subject of a request for production of documents;
- 34 D. IDENTIFY the person(s) presently most knowledgeable about the
35 information sought in this interrogatory or its subparts.

36 ANSWER:

37 No.

38

1 54. Did YOU or any of YOUR predecessors-in-interest MARKET and
2 ASBESTOS-CONTAINING FRICTION PRODUCTS to any agency or department of
3 the U.S. Government? If so, IDENTIFY each agency or department of the U.S.
4 Government to whom YOU MARKETING products and as to each agency of
5 department of the U.S. Government IDENTIFY the product that YOU MARKETING
6 to them and the inclusive years that YOU did so.

- 7 A. Either attach all DOCUMENTS or disks containing such data,
8 evidencing the information sought in this interrogatory and its
9 subparts to YOUR answers to these interrogatories or describe
10 such DOCUMENTS with sufficient particularity that they may be
11 made the subject of a request for production of documents;
12 B. IDENTIFY the person(s) presently most knowledgeable about the
13 information sought in this interrogatory or its subparts.

14 ANSWER:

15 Chrysler has not located records to sufficient to indicate the time periods or
16 identity of particular U.S. government agencies. Chrysler, however, believes
17 that it may have supplied new vehicles and replacement parts to U.S.
18 government agencies through fleet sales arrangements.

19 55. Did YOU or any of YOUR predecessors-in-interest MARKET any
20 ASBESTOS-CONTAINING FRICTION PRODUCTS to any agency or department of
21 any governmental entity other than the U.S. Government? If so, IDENTIFY any
22 agency or department of any governmental entity other than the U.S. Government
23 to whom YOU MARKETING products and as to each agency or department of said
24 governmental entity other than the U.S. Government, IDENTIFY the product that
25 YOU MARKETING to them and the inclusive years that YOU did so.

- 26 A. Either attach all DOCUMENTS or disks containing such data,
27 evidencing the information sought in this interrogatory and its
28 subparts to YOUR answers to these interrogatories or describe
29 such DOCUMENTS with sufficient particularity that they may be
30 made the subject of a request for production of documents;
31 B. IDENTIFY the person(s) presently most knowledgeable about the
32 information sought in this interrogatory or its subparts.

33 ANSWER:

34 Chrysler has not located records to sufficient to indicate the time periods or

1 E. IDENTIFY the person(s) presently most knowledgeable about the
2 information sought in this interrogatory or its subparts.

3 **ANSWER:**

4 Chrysler is in possession of service manuals containing the information
5 sought in this interrogatory with respect to servicing brake linings and clutch
6 facings. These manuals will be made available for inspection and copying at
7 a mutually convenient time and place.

8 60. Did any of the individuals or COMPANIES identified in YOUR answer
9 to interrogatory Nos. 46-55 inclusive and Interrogatory No. 61 have an exclusive
10 relationship with YOU? If so, IDENTIFY the individual or COMPANY, the
11 production for which the exclusive relationship existed and the inclusive dates of
12 the exclusive relationship.

- 13 A. Either attach all DOCUMENTS or disks containing such data,
14 evidencing the information sought in this interrogatory and its
15 subparts to YOUR answers to these interrogatories or describe
16 such DOCUMENTS with sufficient particularity that they may be
17 made the subject of a request for production of documents;
18 B. IDENTIFY the person(s) presently most knowledgeable about the
19 information sought in this interrogatory or its subparts.

20 **ANSWER:**

21 Not to Chrysler's knowledge.

22 61. Did YOU at any time between 1930 and 1985 own or operate a
23 wholesale or retail business or store in the DEFINED GEOGRAPHIC AREA at which
24 ASBESTOS-CONTAINING FRICTION PRODUCTS were MARKETING?

25 If so:

- 26 A. State the name, address and years that the BUSINESS or store
27 were in operation;
28 B. IDENTIFY the owner and operator of the store or BUSINESS and
the inclusive dates thereof;
C. IDENTIFY and describe the NATURE of the ASBESTOS-
CONTAINING FRICTION PRODUCTS sold at the BUSINESS or
store and the inclusive dates thereof;
D. Did the store of BUSINESS have an exclusive relationship with
any manufacturer or MARKETER OF ASBESTOS-CONTAINING
FRICTION PRODUCTS? If so, IDENTIFY the manufacturer or
MARKETER, IDENTIFY the ASBESTOS-CONTAINING FRICTION
PRODUCTS and state the inclusive dates of the exclusive
relationship;

- 1 E. Either attach all DOCUMENTS or disks containing such data,
2 evidencing the information sought in this interrogatory and its
3 subparts to YOUR answers to these interrogatories or describe
4 such DOCUMENTS with sufficient particularity that they may be
5 made the subject of a request for production of documents;
6 F. IDENTIFY the person(s) presently most knowledgeable about the
7 information sought in this interrogatory or its subparts.

8
9
10 **ANSWER:**

11 Chrysler is in possession of a list of Market Investment Dealerships
12 (dealerships in which Chrysler had an ownership interest) it has been able to
13 identify in the defined geographic area between 1930 and 1985, and will
14 make this list available at a mutually agreeable time and place.

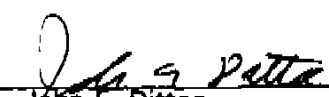
15
16 62. If any person YOU have identified in YOUR answers to these
17 interrogatories has had his or her deposition taken, IDENTIFY the deposition by the
18 name of the deponent, the date the deposition was taken, the caption and number
19 of the action in which it was taken, the court which had jurisdiction over the
20 action in which it was taken (including state and county) and either the name and
21 address of the court reporting agency which took the deposition or the name and
22 address of deponents's counsel of record.

23 **ANSWER:**

24 See answer to Interrogatory number 12.

25
26 DATED: February 24, 1998

27
28 CROSBY, HEAFEY, ROACH & MAY
Professional Corporation

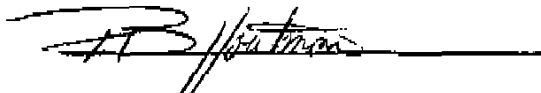
By 

John E. Dittoe
Attorneys for Defendant
Chrysler Corporation

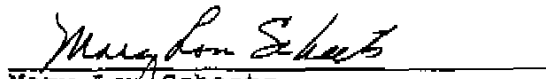
CROSBY, HEAFEY, ROACH & MAY
PROFESSIONAL CORPORATION

STATE OF MICHIGAN)
)
COUNTY OF OAKLAND)

The undersigning person, being duly sworn on oath, deposes and says that such person is an Assistant Secretary of Chrysler Corporation (the surviving corporation following the mergers effective December 30 and 31, 1989 of Chrysler Corporation and a number of its subsidiaries, including Chrysler Motors Corporation); that such person has read the foregoing Responses to Plaintiffs' Standard Interrogatories to Friction Defendants and subscribed to the same on behalf of Chrysler Corporation; that the foregoing responses are based on information communicated by Chrysler Corporation former personnel and other persons and information obtained from books and records of Chrysler Corporation; and that such person believes the foregoing answers to be true and correct.


Assistant Secretary
Chrysler Corporation

Subscribed and sworn to before me
this 17th day of September, 1997.


Mary Lou Scheets
Notary Public, Oakland County
State of Michigan
My Commission Expires: 03/02/00