(c) The warnings were included from the late 1970's until the use of asbestos-containing friction materials was discontinued.

(d) Warnings on skids and pallets of brake assemblies were included upon request from the OEM's, who designated the friction material to be included in the brake assemblies for their vehicles.

(e) Kelsey-Hayes has no information about whatever meetings or discussions were conducted concerning putting warnings on skids and pallets of brake assemblies.

(f) Kelsey-Hayes at this time is unaware of any documents that refer to meetings or discussions concerning putting warnings on skids and pallets of brake assemblies. However, Kelsey-Hayes is continuing to investigate this question and will supplement this response as appropriate.

INTERROGATORY NO. 88:

State the date on which any official of you and/or any predecessor/related entity first had knowledge, notice, information or understanding that exposure to asbestos would, could or might cause each of the following diseases:

(a) Pleural disease;

(b) Asbestosis;

(c) Mesothelioma;

(d) Lung cancer;

(e) Any other forms of cancer.

ANSWER: Kelsey-Hayes objects to the interrogatory because it assumes there is an established link to certain disease processes which link Kelsey-Hayes denies. Without waiving the objection, Kelsey-Hayes became aware of the hazards of friable asbestos fibers as that information was released by the government and became known to the population in general. The specific date is unknown. However, the United States Department of Labor issued regulations regarding friable asbestos as of January 1, 1972, in the CFR under Title 29, Part 9000, in which it was implicit that the government asserted such an association at certain levels of exposure. Kelsey-Hayes has no knowledge that encapsulated fibers may be hazardous.

INTERROGATORY NO. 89:

With respect to each disease set forth in Interrogatory No. 89: