(e) is the defendant in possession of any invoices or for such sales to independent distributors listed in response to subparagraph (b). If so provide a copy of same;

(f) is the defendant in possession of any reports, memorandum or correspondence for the sale of such brake shoes with asbestos containing brake linings to contracts or agreements with the independent distributors listed in response to subparagraph (b). If so provide a copy of same

ANSWER:

No.

Interrogatory No. 31

Did the answering defendant collect or receive used brake shoes from customers for the purpose of relining the brake shoe either by itself or through others? If the answer is in the affirmative state:

(a) the first and last year that such used brake shoes were collected;

(b) did the answering defendant charge any sort of deposit or give a credit for a used shoe at the time of the sale of a replacement brake shoe sale? If so during what years or time period was this the practice;

(c) describe the system or method for the collection of used brake shoes;

(d) did the answering defendant receive used brake shoes from Roadway Express for relining? If so during what time period? Provide all documents inclusive of invoices, memorandum, correspondence and contracts relative to same.

ANSWER:

No.

Interrogatory No. 32

Did the defendant ever reline used brake shoes at one of its facilities? If so:

(a) indicate the name and location of the facility;

(b) provide the years that such relining was performed with asbestos containing brake linings;