

limit values of asbestos dust or particles to which applicators or consumers of asbestos-containing products were exposed while using any product identified in response to Interrogatory Nos. 19 and 42, including:

- (a) The product being used;
- (b) Identify any and all person(s), firm(s) or entity(ies) conducting or participating in the conducting of said test;
- (c) State the date(s) of said test;
- (d) Describe the methodology, results and conclusions of said test;
- (e) Identify any and all documents referring to, relating or reflecting said test or the results and conclusions thereof; and,
- (f) Identify any and all persons to whom any document referring to, relating to or reflecting the results or conclusions of said test was sent.

ANSWER:

It was known or knowable from generally available medical, scientific, and industrial hygiene literature that threshold limit values applied to asbestos-containing products. Industrial hygiene studies conducted in Warner Electric Brake & Clutch Company manufacturing facilities showed the products would be manufactured safely. Other studies and testing by Warner Electric Brake & Clutch Company of its own products showed the products could be used safely. *See also* Answers to Interrogatory Nos. 43 and 56, which are incorporated herein as if fully rewritten.

INTERROGATORY NO. 78:

Did Defendant, any predecessor or any related company, at any time, directly advise the owners or management employees of any worksite in which it sold or applied any product listed in response to Interrogatory Nos. 19 and 42, of threshold limit values for exposure to asbestos dust