INTERROGATORY NO. 118:

At any time during the period 1948 to 1978, has defendant manufactured automobile brake linings or brake assemblies? If so, please state:

(a) The trade or brand name(s) under which the brake linings or brake assemblies were marketed;

(b) The years during which the brake linings or brake assemblies, under each trade or brand name, were manufactured;

(c) The date each product was withdrawn from the market, if such is the case;

(d) The quantitative percentage of each chemical component of the brake linings under each trade or brand name;

(e) If asbestos was included in the composition of the brake linings which defendant manufactured under any trade or brand name, please state:

(i) The type of asbestos fiber (i.e., amosite, chrysotile, crocidolite) used in the brake linings under each trade or brand name;

(ii) The quantitative percentage of asbestos fiber used in the brake linings under each trade or brand name;

(iii) The years during which asbestos fiber was included in the composition of the brake linings under each trade or brand name;

(f) The location of the facility (facilities) where the brake linings or brake assemblies were manufactured.

RESPONSE:

Yes.

(a) OBJECTION. This responding defendant objects to

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