

- 1 (b) The time span during which each named item was
2 produced;
- 3 (c) The amount of each product, expressed in pounds
4 or tons, which was produced by each plant during
the Relevant Times;
- 5 (d) The person(s) at each such plant in charge of
6 producing each such asbestos product;
- 7 (e) The person(s) in charge of packaging each
8 asbestos product;
- 9 (f) The person(s) in charge of labeling each such
product.

10 ANSWER:

- 11 (a) In the U.S. - Cleveland, Ohio up to 1952
- Bedford, Ohio 1952-present
- Nashville, Tennessee 1982-present
- 12 (b) 1963-present--roll lining, fabricated parts
1974-present--paper friction materials;
- 13 (c) Irrelevant objection and probably not able to lead to
the development of this data, in any event;
- 14 (d) Bedford - Robert Martin, Vice President, Manufacturing
Nashville - Ed Stanek, Plant Manager;
- 15 (e) See response to No. 1.12(d);
- 16 (f) See response to No. 1.12(d).

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20 1.13 During the Relevant Times, did you maintain or

21 distribute manuals, instructions, dealer handbooks or pricing

22 information pertaining to the sale, use, installation or removal of

23 asbestos or asbestos products?