asbestos-containing friction products were used– Bob July) and a plant nurse (Mae Martin, 1968 to 2003).

INTERROGATORY NO. 49:

Does Defendant have, or has Defendant, any predecessor or any related company ever had, a Research Department? If so:

(a) State when such department was established, and whether or not such department has operated continuously since being established;

(b) State how much Defendant, its predecessor and/or related company expended each year on research; and

(c) State the percentage of said expenditure which was for research concerning the health affects of asbestos;

(d) Identify the person(s) in charge of such department throughout its existence; and

(e) Identify the person(s) in charge of any asbestos-related research conducted by such department throughout the years.

ANSWER:

Warner Electric Brake & Clutch Company did perform research and testing for new product development, to verify performance characteristics of its products and components, and to assure compliance with customer specifications. For a period of time, this was done by a designated Research and Development Department headed by John Schipinski and perhaps others. At other times, research and development was handled by engineers by assignment.

INTERROGATORY NO. 50: