

1 for each such person you have identified, state the time periods
2 each such person represented you.

3 ANSWER: Objection - this is privileged, proprietary information.
4 Counsel in Seattle has in his possession the names and addresses and
5 will deliver same for an inspection by the court and would agree to a
6 review of the list by plaintiff's counsel pursuant to an agreement of
7 confidentiality and nondisclosure to other persons or parties including
8 defendants in the present litigation without further order of the court
9 Western Brake is not a distributor, dealer, agent or manufacturing
10 representative of S. K. Wellman. S. K. Wellman has no records of
11 sales to the Western Brake Co.

12 1.21.1 If you are a defendant manufacturer, seller or
13 distributor of motor vehicles, identify:

- 14 (a) The name and address of each and every
15 manufacturer from whom defendant or any of its
16 subsidiary companies obtained brake linings or
17 brake pads or brake facings for installation or
18 use in any motor vehicles manufactured or sold
19 by defendant from 1950 through 1978;
- 20 (b) The name and address of the distributor or
21 seller from whom defendant or any of its
22 subsidiary companies obtained brake linings,
23 brake facings or brake pads for use in any motor
24 vehicles manufactured or sold by defendant from
25 1950 through 1978;
- 26 (c) The type, including dimensions, and brand name
of each brake lining, brake facing or brake pad
defendant or any of its subsidiary companies
purchased or obtained for use in any motor
vehicles manufactured or sold by defendant from
1950 through 1978, and from whom each such
product was purchased or otherwise obtained;