

exposures to high doses of asbestos fibers were hazardous to workers' health. The cases reported at that time usually involved persons employed in the manufacture of products where exposures were largely uncontrolled and could have exceeded hundreds of fibers per cc. The disease associated with these intensely high exposures was asbestosis. Warner Electric Brake & Clutch Company did not manufacture or sell end products that could cause such intensely high exposures nor does Defendant believe that such exposures occurred at any manufacturing facilities owned by Warner Electric. Air samples taken confirm this belief. Nor has Warner Electric Brake & Clutch Company ever made or sold products that contained asbestos intended for use by any trades other than those utilizing electric clutch and electric brake products. The available data has shown that electric clutches and brakes that contained asbestos are not hazardous to workers' health.

It is not possible to pick a specific time or date when it was known or knowable that certain distinct diseases were causally related to exposure to certain types and/or levels of exposure. Defendant understands that pleural plaques and thickening, asbestosis, lung cancer and mesothelioma were all causally associated with exposure to asbestos for certain types and levels before Defendant acquired Warner Electric Brake & Clutch Company in 1985. Defendant does deny that all fiber types cause mesothelioma and that asbestos exposure causes cancer other than as listed above. Defendant also denies that any asbestos-related disease occurs as a result of exposure to electric clutches and brakes of the type manufactured and/or sold by Warner Electric Brake & Clutch Company.

INTERROGATORY NO. 80:

With respect to each disease set forth in Interrogatory No. 79: