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PLAINTIFF'S EXHIBIT

AB-308

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IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON
FOR KING COUNTY

DONALD L. HORN, Plaintiff, v. THE BENDIX CORP., et al., Defendants.	NO. 80-2-09935-3 PLAINTIFF'S FIRST INTERROGATORIES, REQUESTS FOR PRODUCTION OF DOCUMENTS AND REQUESTS FOR ADMISSION AND ANSWERS AND RESPONSES THERETO

TO: Defendant S. K. Wellman

AND TO ITS ATTORNEY: Stafford, Frey & Mertel

PLEASE TAKE NOTICE that the plaintiff hereby submits the original and two copies of the following interrogatories pursuant to the Style Order, CR 26 and CR 33, together with Plaintiflf's First Requests for Production of Documents and First Requests for Admission pursuant to CR 34 and CR 36. In accordance with CR 33, you are to answer the interrogatories under oath, and return within sixty (60) days of the date of service of these interrogatories, requests for production and requests for admission. To the extent possible, answers to the interrogatories should be typed in the spaces provided, adding pages if additional space is required. In accordance with CR 34, you are to produce the documents requested herein for inspection and copying at the offices of Dodd, Coney & Bishop, P. S., Suite 312 - 1411 Fourth Avenue Building, Seattle,

DODD, CONEY & BISHOP, P.S
312-1411 FOURTH AVENUE BUILDING
SEATTLE, WASHINGTON 98101
622-5304

1.09 Does defendant maintain an organization table or tables? If you have answered this in the affirmative, identify the custodian of each table.

ANSWER: Yes, J. E. Mencini.

REQUEST FOR PRODUCTION B: Pursuant to CR 34, attach or produce according to the above instructions a copy of each such identified table or organization.

RESPONSE: This will be produced when satisfactory arrangements have been made between counsel to do so.

1.10 Has defendant or any of its subsidiary companies at any time engaged in the mining, manufacturing, marketing, assembling, rebranding, distributing or sale of any material or product containing asbestos fibers? See instruction 12, page 6, for definition of the terms "asbestos or asbestos product". The scope of this interrogatory includes the manufacture, distribution, assembling, marketing or sale of products into which asbestos-containing products were incorporated.

ANSWER: Yes.

1.11 If the answer to the preceding interrogatory is in the affirmative, state the following:

(a) The names of the companies mining, manufacturing, marketing, distributing, rebranding, assembling and/or selling each of those products, and specify whether these companies mined, manufactured, marketed, distributed and/or sold material containing asbestos fibers;

(b) The trade or brand name of each of those products mined, manufactured, marketed, distributed and/or sold;

(c) The date each of the named products was placed on the market;

(d) The date each of the named products was withdrawn from the market;

(e) A description of the physical (chemical) composition of each of the named products, including the type and percentage of asbestos contained in each product and the purpose of each ingredient for each year said product was manufactured, sold, distributed, rebranded and/or sold;

(f) A description of the physical appearance of each of the named products, including any identifying color(s), stamp(s), stripe(s), texture, etc. for each year said product was manufactured, sold, distributed, rebranded and/or sold;

(g) The sources of the asbestos ingredients contained in each product;

(h) Where each asbestos ingredient was obtained;

(i) Where the asbestos ingredients were delivered;

(j) When the asbestos ingredients were obtained;

(k) A detailed description of the intended uses of each of the asbestos-containing products;

(l) The date you controlled, purchased or acquired any interest in any other corporation which mined, manufactured, marketed, distributed or sold asbestos-containing products;

(m) The manner of acquisition, including percentage of ownership;

(n) The date of the sale of any such interest, or portion of such interest and the purchaser;

(o) The date any such predecessor or subsidiary corporation ceased doing business.

ANSWER:

(a) S. K. Wellman - manufacture, market, distribute, sell;
(b) Velvetouch Organik; Velvetouch Ferrometal;
(c) 1963 to present - roll lining and fabricated parts; 1984 to present - paper friction products;
(d) See 1.11(c) above;
(e) Woven roll lining--composed of long fiber asbestos spun into yarn with friction modifiers of brass, copper or zinc wire; woven on carpet looms to width, thickness and length; treated with organic resins and heat; ground.

Flexible moded and molded materials including 3/4" truck block, industrial sets, pads and gears--composed of short fiber asbestos mixed with metal chips of brass, copper or zinc (continued on attached)

1.12 Please identify by location and product produced each plant in which the asbestos-containing products listed in the previous answer were manufactured and/or assembled, rebranded or otherwise produced and for each plant state:

(a) The dates each such plant was in operation;

Continuation of Answer to No. 1.11:

and organic resins; extruded or passed into a mold; cured under heat and pressure to rough dimensions; ground to finished dimension and drilled for mounting.

Paper friction products--composed of cellulose fibers, crysotile asbestos, carbon or graphite and mineral fillers, e.g., sillica and ullite, bonded together by phenolic resins, affixed to both sides of a flat steel ring with a phenolic adhesive under heat and pressure and finished by machining grooves in the friction material. Asbestos content range: 13%-24%.

Investigation continuing as to type of asbestos contained in these products.

(f) See response to No. 1.11(e); can contain part number "SKW" and/or "Velvetouch";
(g) Raybestos Manhattan (Raymark); Abex Corp.; Wheeling Br Block; Frasle, Virginia Friction, Lydall; Armstrong; QuinnT, In
(h) See response to No. 1.11(g);
(i) S. K. Wellman facilities;
(j) Continuous basis;
(k) Clutch or brake devices for control of motion through application of friction;
(l) See preliminary statement;
(m) See preliminary statement;
(n) None;
(o) None.

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FOR KING COUNTY

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(m) The manner of acquisition, including percentage of ownership;

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ANSWER:

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(c) 1963 to present - roll lining and fabricated parts; 1984 to present - paper friction products;
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(e) Woven roll lining--composed of long fiber asbestos spun into yarn with friction modifiers of brass, copper or zinc wire; woven on carpet looms to width, thickness and length; treated with organic resins and heat; ground.

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(i) S. K. Wellman facilities;

(j) Continuous basis;

(k) Clutch or brake devices for control of motion through application of friction;

(l) See preliminary statement;

(m) See preliminary statement;

(n) None;

(o) None.

IN THE CIRCUIT COURT OF THE 11TH
JUDICIAL CIRCUIT IN AND FOR
DADE COUNTY, FLORIDA

GENERAL JURISDICTION DIVISION

CASE NO.: 91-29011CA42

JOSEPH BROMBERG and FLORENCE BROMBERG,

Plaintiffs,

v.

ABEX CORPORATION, et al.

Defendants.

STATE OF OHIO)
)ss.:
COUNTY OF CUYAHOGA)

STEVE CVITKOVICH, being first duly sworn, deposes and states that if called upon to render testimony in this cause, he would be competent to and could testify as to the following, based on his personal knowledge:

1. I was employed by the S.K. Wellman Corporation and its predecessors (collectively "Wellman") from 1952 until I retired in 1984. For virtually all of that time, I was involved in sales and marketing operations.

2. Because of my long involvement with the friction materials business and in particular with Wellman, I am familiar with the history of Wellman's business, its product lines and its customer base.

3. Wellman was and is in the friction materials business, principally non-asbestos-containing friction materials. One of Wellman's product lines was the "Velvetouch" clutch facing. Wellman never manufactured or sold any clutch facings

Exhibit "C"

under the tradename "Velvetouch" which contained asbestos. All clutch facings sold under the "Velvetouch" name were metallic components which did not contain asbestos.

FURTHER AFFIANT SAYETH NOT.

Steve Cvitkovich

Subscribed and Sworn to
before me this 28th day
of January 1992.

Dennis B. Angers
Notary Public
DENNIS B. ANGERS
Notary Public, for the State of Ohio
My Commission Expires April 10, 1996