manufacturer of the brake shoe or lining. If by the manufacturer of the brake shoe or lining set forth the name of the manufacturer.

(h) is the answering defendant in possession of any specimen photographs of brake shoes of the type offered for sale which had the instruction. If so provide a copy of same;

(i) is the answering defendant in possession of any design drawings depicting the instruction on any brake shoes of the type offered for sale If so provide a copy of same.

ANSWER:

OBJECTION. Vague. Without waiving this objection, no.

Interrogatory No. 40

Did any brake shoe with an asbestos containing brake lining sold by the answering defendant either as original equipment as part of an axle or wheel assembly or as a replacement part ever have any labeling directly upon the brake shoe itself that a grinding wheel should not be used to grind a brake lining. (This demand relates to the word "asbestos" directly on the brake shoe itself and not on any packaging or a separate reference in any separate manual, book, or publication that the brake lining contained asbestos). If so state:

(a) the first and last date the instruction appeared on the brake shoe;

(b) the wording of each version of the instruction and the dates of use;

(c) indicate whether the instruction appeared on the lining portion of the brake shoe;

(d) indicate whether the instruction appeared on the metal portion of the brake shoe;

(e) set forth the method of labeling (namely was the instruction, printed, etched, metal stamped, on an adhesive label or string tag);

(f) indicate the font style, size and color of the instruction;

(g) whether the instruction was added by the answering defendant or placed by the manufacturer of the brake shoe or lining. If by the manufacturer of the brake shoe or lining set forth the name of the manufacturer.

(h) is the answering defendant in possession of any specimen photographs of brake shoes of the type offered for sale which had the instruction. If so provide a copy of same;