

1 cation or for disc brake applications predating recent design
2 changes.

3 INTERROGATORY NO. 85:

4 Please state whether this defendant has distributed
5 any catalogs, brochures, pamphlets or other advertising materi-
6 als regarding its asbestos-containing products between 1930 and
7 1972.

8 RESPONSE TO INTERROGATORY NO. 85:

9 Wagner objects to this interrogatory on the grounds
10 that it is overly broad, unduly burdensome and not calculated to
11 lead to the discovery of admissible evidence.

12 INTERROGATORY NO. 86:

13 Does defendant advertise its asbestos-containing prod-
14 ucts by any media whatsoever.

15 RESPONSE TO INTERROGATORY NO. 86:

16 Wagner objects to this interrogatory on the grounds
17 that it is overly broad, unduly burdensome and not calculated to
18 lead to the discovery of admissible evidence.

19 INTERROGATORY NO. 87:

20 Please state whether defendant sold any asbestos-
21 containing products to any United States governmental agency
22 between 1930 to 1972. If so:

23 (a) List the name and address of each such agen-
24 cy;

25 (b) The dates of each sale;

26 (c) The final government destination of each
27 product sold;

28 (d) The type and serial or model number of prod-
ucts sold or distributed to said agencies.

RESPONSE TO INTERROGATORY NO. 87:

Wagner objects to this interrogatory on the grounds
that it is irrelevant, is not calculated to lead to the discov-