

1 RESPONSE TO INTERROGATORY NO. 16:

2 Wagner objects to this Interrogatory on the grounds
3 that it is not confined to any relevant time frame, is vague in
4 that it does not define "design changes" and is not confined to
5 the issue in this case or calculated to lead to the discovery of
6 admissible evidence and is therefore overly broad and unduly
7 burdensome. Subject to that objection, Wagner states that there
8 have been changes in its products.

9 INTERROGATORY NO. 17:

10 If the answer to Interrogatory No. 16 is affirmative,
11 please state:

12 (a) The nature of the change made;

13 (b) The name, address, and job classification of each
14 person ordering the change in design.

14 RESPONSE TO INTERROGATORY NO. 17:

15 See Wagner's response to Interrogatory No. 16.

16 INTERROGATORY NO. 18:

17 Has defendant, at any time since 1930, published and-
18 /or distributed any brochures, sales literature, pamphlets, or
19 other written materials of any kind that contain any warnings,
20 cautions, caveats or direction concerning the possibility of
21 injury resulting from the use of the products listed in Inter-
rogatory No. 10 above? If so, identify each brochure sales
literature, pamphlet or other written material and the date of
publication and distribution.

21 RESPONSE TO INTERROGATORY NO. 18:

22 Wagner has supplied its distributors, mechanics and
23 their employers, and purchasers with the following warnings:

24 1976-present: "CAUTION: CONTAINS ASBESTOS FIBERS. AVOID
25 CREATING DUST. BREATHING ASBESTOS DUST MAY
26 CAUSE SERIOUS BODILY HARM."
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