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- (a) Defendant;
- (b) each and every predecessor; and,
- (c) each and every related company.

ANSWER TO INTERROGATORY 16.

Automotive component products, which may have contained asbestos encapsulated in a phenolic resin were first manufactured in 1928 and discontinued in 1986. Manual clutch assemblies from 1928 –1986; automatic transmission components from the early 1950's until 1983 and disc brake pads for model years 1971 – 1975.

INTERROGATORY NO. 17: State the first and last dates on which any asbestos containing product was specified, sold, distributed, applied and/or installed within the United States by:

- (a) Defendant;
- (b) each and every predecessor; and,
- (c) each and every related company.

ANSWER TO INTERROGATORY 17.

See answer to interrogatory 16.

INTERROGATORY NO. 18: State the last date on which Defendant or any related company specified, sold, distributed, applied and/or installed any asbestos-containing product outside the United States and identify by brand or trade name the products so specified, sold, distributed, applied and/or installed.

ANSWER TO INTERROGATORY 18.

Unknown.

INTERROGATORY NO. 19: Identify by full and complete trade name, any and all asbestos-containing products as defined above, which this Defendant, any related company, or any predecessor(s) has, at any time:

- (a) Designed;
- (b) Manufactured;
- (c) Processed;
- (d) Sold;