

Defendant's investigation with respect to axles sold by Heavy Axle Products continues.

The investigation to date has revealed that any brakes made with asbestos that Defendant installed onto heavy axles came with a warning from the brake manufacturer, which warning stated that the brake contained asbestos

With respect to Trailer Axle Products, by at least the mid-1980s, the following language was included in Defendant's installation and field maintenance manual for trailer axles, brakes and components, which manual was distributed to customers of such products:

"DANGER! ASBESTOS BRAKE LININGS CONTAIN ASBESTOS FIBERS

BREATHING ASBESTOS DUST MAY BE HAZARDOUS TO YOUR HEALTH AND MAY CAUSE SERIOUS RESPIRATORY OR OTHER BODILY HARM

AVOID CREATING DUST

DO NOT REMOVE BRAKE DRUM WITHOUT PROPER PROTECTIVE EQUIPMENT

DO NOT WORK ON BRAKE LININGS WITHOUT PROPER PROTECTIVE EQUIPMENT

DO NOT REPLACE BRAKE LININGS WITHOUT PROPER PROTECTIVE EQUIPMENT

DO NOT ATTEMPT TO SAND, GRIND, CHISEL, FILE, HAMMER OR ALTER BRAKE LININGS IN ANY MANNER WITHOUT PROPER PROTECTIVE EQUIPMENT

FOLLOW O.S.H.A. STANDARDS FOR PROPER PROTECTIVE DEVICES TO BE USED WHEN WORKING WITH ASBESTOS MATERIALS."

Defendant's investigation with respect to axles sold by Light Axle Products continues.

Material Safety Data Sheets and other information relating to certain axle products

were also available from Defendant upon request. See response to Interrogatory 93.

Additional information regarding warnings, to the extent known to Defendant, may be ascertained from the Axle Product Divisions warning files, which files will be made available for inspection and copying at a mutually convenient time and location, except for those

**LEYL ROYSTER
VOELKER
& ALLEN**

Suite 100
* Twain Plaza II
100 W. Randolph Street
Box 467
Chicago, IL 60625-0467
Tel. (312) 656-7940
Fax (312) 656-4646