

ANSWER: Ford could not possibly know all the uses or methods of removal "used by mechanics since 1940." Mechanics could possibly be exposed to asbestos fibers during the process of cleaning brake linings. _

20. Please state whether or not you ever obtained any knowledge concerning the likelihood of asbestos inhalation being hazardous to health, and if so, state when the corporation first became aware of the hazardous potential of asbestos and its products. State how the Defendant first obtained this knowledge and became so aware of said hazards and from what source this information was obtained.

ANSWER: Ford cannot state when a Ford employee first had knowledge of such information. See 18.

21. Please state the date when you first notified mechanics engaged in the application or removal of asbestos containing brake linings as to the need to wear respirators.

ANSWER: See 19.