

(d) Whether there is an inventory of the books and publications which are or were housed in this library, and if so, attach a copy hereto.

ANSWER: None.

B23. Did defendant or its agents or employees ever make any effort to keep abreast of medical literature concerning potential health hazards posed by the use of and/or exposure to asbestos? Indicate the names, addresses and job positions of all your company's employees who reviewed this literature.

ANSWER: Yes. Chrysler Motors Corporation has not retained any records to enable them to answer this question.

B24. Prior to 1964 had your company done any studies or tests or had your company participated in, been the subject of or been aware of any studies or tests by others concerning the potential effects of inhalation of asbestos dust or fibers by one using or being exposed to asbestos or asbestos containing products. If so, state:

ANSWER: No, with respect to brake dust.

(a) The date each study or test was conducted and the date defendant became aware of said study or test;

ANSWER: N/A.

(b) The names and addresses of the persons conducting each test or study;

ANSWER: N/A

(c) The purpose of the study or test;

ANSWER: N/A

(d) The results of each study or test;

ANSWER: N/A

(e) If reduced to writing attach a copy hereto.

ANSWER: N/A

B25. Prior to 1964, did defendant's agents or employees conduct any experiments with laboratory animals to determine whether or not its asbestos containing products were potentially hazardous to the health of workers who were using them? If so, for each such experiment which was conducted, indicate who conducted it, state when it was conducted and describe the results of each such experiment.

ANSWER: No.

B26. Since 1964 has your company done any studies or tests or has your company participated in, been the subject of, or been aware of any studies by others concerning the effects of inhalation of asbestos dust and fibers by one using or being exposed to asbestos or asbestos containing products? If so, state the following:

ANSWER: No, with respect to brake dust.