proper and unforeseeable way. Wagner does not admit that there is any health hazard associated with the use of its products.

INTERROGATORY NO. 27:

Please describe in detail the type of packages in which defendant has sold or distributed asbestos-containing material, listing the dates each type of package was used, and a description of any printed material or trademarks that appeared thereon.

RESPONSE TO INTERROGATORY NO. 27:

Wagner has distributed and sold its aftermarket brake shoes and disc pads in containers and packages of various shapes, sizes, types, and colors, primarily rectangular boxes with red and/or blue lettering against a white background.

INTERROGATORY NO. 28:

Did defendant receive any reports or communications from any insurance carrier with regard to the hazards incident to the use of asbestos-containing products? If so, please state the name of the person(s) who has possession of said reports, the location of the reports and a summary of the contents of the reports, including the name of each insurance company, its address, and the agent delivering such information.

RESPONSE TO INTERROGATORY NO. 28:

Wagner objects to this Interrogatory on the grounds that it is irrelevant and is not calculated to lead to the discovey of admissible evidence. Subject to that objection, Wagner states that it received no such reports.

INTERROGATORY NO. 29:

Has any other defendant named herein ever furnished the answering defendant with information as to the state of medical knowledge regarding the connection between asbestos exposure and the development of pulmonary diseases, including cancer and asbestos?

RESPONSE TO INTERROGATORY NO. 29:

No, to the best of Wagner's knowledge.