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Chrysler Corporation,
a corporation

SUPERIOR COURT OF CALIFORNIA - CITY AND COUNTY OF SAN FRANCISCO

IN RE:

COMPLEX ASBESTOS LITIGATION

No. 828-684

SUPPLEMENTARY RESPONSES TO PLAINTIFFS' STANDARD
INTERROGATORIES TO DEFENDANT

Propounding Party: Plaintiffs
Responding Party: Defendant Chrysler Corporation, a
corporation
Set Number: Plaintiffs' Standard Set (Exhibit "I" to
General Order 29)

Defendant Chrysler Corporation makes the following
supplemental responses to plaintiffs' Standard Interrogatories:

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RESPONSE TO INTERROGATORY NO. 2:

e. Chrysler is without information adequate to respond to this interrogatory.

RESPONSE TO INTERROGATORY NO. 3: Chrysler Corporation

underwent a corporate reorganization in 1986 and is now doing business as Chrysler Motors Corporation. The names Plymouth, Dodge and De Soto identify products that have been made by Chrysler Corporation and also have identified divisions of Chrysler Corporation, but Chrysler Corporation has not done business under those names.

RESPONSE TO INTERROGATORY NO. 9: Chrysler Corporation

reasserts all objections previously stated, but states that it manufactured asbestos-containing brake products and clutch parts for automobiles only since 1959.

RESPONSE TO INTERROGATORY NO. 10: Chrysler

Corporation objects to this interrogatory on the ground that it is unduly burdensome and that the burden it imposes is grossly incommensurate with the results obtainable; in addition, the information sought is equally available to both parties. To list every authorized Chrysler dealer in 46 counties over 55 years would require hundreds of manhours and serve no other purpose than to establish that which all parties already know, i.e., that any automobile agency selling new Chrysler, Dodge,

1 RESPONSE TO INTERROGATORY NO. 17: The following
2 entities supplied passenger car brake linings to Chrysler in :
3 years indicated: 1981, Bendix Corp. Friction Material Divisio
4 1980, same as 1981; 1979, same as 1981; 1978; Abex Corp. and
5 Bendix Corp.; 1977, same as 1981; 1976, same as 1981; 1975, sa
6 as 1981; 1974, Bendix Corp. and Raybestos-Manhattan; 1970-1973
7 same as 1981; 1969, same as 1978; 1968, Abex Corp. and Johns-
8 Manville Corp.; 1965-1967, same as 1968; 1963-1964, same as
9 1981; 1962, Bendix Corp., Johns-Manville Corp.; 1960-1961, sam
10 as 1968; 1959, Abex Corp. and Johns-Manville Corp. (All dates
11 are model years.)
12

13 RESPONSE TO INTERROGATORY NO. 19: Chrysler continues
14 to object to this interrogatory as it pertains to clutch
15 products on the ground that warnings are irrelevant to any issu
16 pertaining to clutch products. Chrysler has given no such
17 warnings in relation to brake shoes, brake blocks, brake pads
18 and brake bands.
19

20 RESPONSE TO INTERROGATORY NO. 20: The original
21 response was complete, notwithstanding objections asserted, on
22 the basis of current information; discovery is continuing and
23 Chrysler will supplement this answer if and when it learns of
24 other depositions responsive to this interrogatory.

25 - - - - -
26 - - - - -

1 RESPONSE TO INTERROGATORY NO. 22: Chrysler reasserts
2 its previous objection to these interrogatories, and in addition
3 objects on the further ground that these questions call for a
4 legal conclusion. These interrogatories can only be answered by
5 litigation of questions of coverage, not by speculation.
6 Nonetheless, and in spite of any past events in Chrysler's
7 fiscal history, Chrysler is able to respond to your claim for
8 damages.

9
10 RESPONSE TO INTERROGATORY NO. 23: See response to
11 Interrogatory No. 22.

12
13 DATED: August 10, 1986.

14
15 CROSBY, HEAFY, ROACH & MAY
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17
18 By


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