

ANSWER:

See Answer to Interrogatory No. 31, which is incorporated herein as if fully rewritten.

INTERROGATORY NO. 33:

With respect to each product listed in response to Interrogatory No. 19, state whether, based upon the material contents, the method of manufacturing, and the method of application, such product could generally be applied or installed without liberating asbestos fibers?

ANSWER:

The products could be installed for their intended uses without liberating asbestos fibers. If any fibers were liberated incidental to installation, the level should be well below the OSHA PEL.

INTERROGATORY NO. 34: [Withdrawn under April 14, 2000 Order.]

INTERROGATORY NO. 35:

Identify each person who participated in the design and/or preparation of manufacturing specifications for each product listed in response to Interrogatory No. 19.

ANSWER:

Defendant objects to naming all such employees or agents as unduly burdensome because, to the extent it is knowable, it could include possibly hundreds of individuals. Further, without Plaintiffs' specific product identification, this interrogatory is overly broad and unduly burdensome. Subject to and without waiving objections, generally, the principal participants would be engineers employed by Warner Electric over time. Listed below are the patents held involving Warner Electric employees. Some relate to products that included friction materials. The patent information includes the patent number (except for most recent patents), the date the patent was issued (except for most recent patents), a description of the product, and the employee inventor. Other information about the patent is available at <http://patft.uspto.gov/netahtml/search-bool.html>.