

13. Has defendant ever sold, supplied, or distributed any asbestos product to any automobile dealership, wholesaler, retailer, distributor, manufacturer, or service station, at any time from 1940 to 1975? If so, as to each type of asbestos product sold, supplied, or distributed by defendant, set forth:

a. the generic, manufacturers, trade and/or brand name;
Automobile disc brake pads

b. the inclusive dates defendant sold, supplied, or distributed each type;
1969 to present

c. the type, grade, weight, and percentile of asbestos within each; and if there was ever any change in the type, grade, weight or percentile of asbestos utilized within any of the aforesaid products, set forth the type, grade, weight, and percentile of asbestos both before and after the change, and state the respective date of each such change;

Object to question on ground that information sought is considered proprietary.

d. the quantity per year sold, supplied, and distributed by defendant;

See C

e. a detailed description of each type, describing the color, shape, and dimensions of the product, as well as setting forth all distinguishing markings, names, symbols, designs, lettering or other writing thereon;

Disc brake pads of various configurations.

f. a detailed description of the type of packages in which defendant sells, distributes, or supplies the product, particularly setting forth the inclusive dates said packages were used, as well as the color, dimensions, shape, material composition of the package, and a description of all lettering, trademarks, writings or numbers which appear thereon.

Friction lock trays and R S C cartons which sizes run approximately 10 X 6 X 4 to approximately 14 X 12 X 4, bearing the company logo, part number and retention warning notice.