

e. Whether you have copies of any warnings in your possession at the present time and if so, identify the location and the custodian of the warning and identify the document by title, author and identification number (alternatively, attach same hereto).

14. Set forth the date that defendant first became aware of a causal relationship or a possible causal relationship between asbestos and any health hazards, illnesses or disease, and state the name and address of the person who on defendant's behalf first became aware of such causal or possible causal relationship in each instance.

ANSWER: R-M first became aware of a potential health hazard from the use of asbestos friction materials during the 1970's. R-M does not know which of its employees was the first to become aware of such information.

15. State the full name, job title and home and business address of any and all persons who have knowledge of any relevant facts relating to the instant matter.

ANSWER: Parties; all persons named in any of those interrogatories; all persons named by all parties in all answers to interrogatories; all persons whose depositions have been taken in this suit or the suit with which this case was consolidated for settlement purposes; John H. Marsh; Isaac H. Weaver; Frederick S. Daly, Sr., all c/o Raybestos-Manhattan, Inc., Stratford, Connecticut; personnel and records including x-rays, etc. of the hospitals at which plaintiff's decedent was treated for the condition for which this claim is made.

16. Are any of defendant's asbestos products or parts containing asbestos marketed or sold by any other person or entity in any manner whatsoever? If so, set forth:

ANSWER: Yes. Please see answers to interrogatories 4, 5 and 10.