(b) the name and address of each independent distributor whose was located in Western New York (defined as Allegany, Cattaraugus, Chautauqua, Erie, Genesee, Orleans, Niagara, Wyoming, Monroe, Wayne, Livingston and Ontario Counties).

(c) is the defendant in possession or control of any contracts or agreements with the independent distributors listed in response to subparagraph (b). If so provide a copy of same;

(d) is the defendant in possession of any invoices or for such sales to independent distributors listed in response to subparagraph (b). If so provide a copy of same;

(e) is the defendant in possession of any reports, memorandum or correspondence for the sale of such asbestos containing brake linings with the independent distributors listed in response to subparagraph (b). If so provide a copy of same

ANSWER:

No.

Interrogatory No. 30

Did the answering defendant ever sell brake shoes with asbestos containing brake linings for use as replacement parts to independent parts distributors? If so state:

(a) the first and last date those brake shoes with asbestos containing brake linings through independent distributors:

(b) the name and address of each independent distributor who had business offices and/or sales showrooms or sales offices located in Western New York (defined as Allegany, Cattaraugus, Chautauqua, Erie, Genesee, Orleans, Niagara, Wyoming, Monroe, Wayne, Livingston and Ontario Counties).

(c) the name and address of each independent distributor whose sales territory included Western New York (defined as Allegany, Cattaraugus, Chautauqua, Erie, Genesee, Orleans, Niagara, Wyoming, Monroe, Wayne, Livingston and Ontario Counties).

(d) is the defendant in possession or control of any contracts or agreements with the independent distributors listed in response to subparagraph (b). If so provide a copy of same;