Beginning in the early 1970's, OSHA regulations required workplace precautions regarding excessive exposure to asbestos. Warner Electric Brake & Clutch Company made a concerted effort to fully comply with the regulations and reasonably expected its industrial customers to comply as well. *See also* Answer to Interrogatory Nos. 56 and 78, which are incorporated herein as if fully rewritten.

INTERROGATORY NO. 64:

Did Defendant, any predecessor or any related company, at any time, place any warning signs or labels on the containers in which any of the products listed in response to Interrogatory Nos. 19 and 42 were packaged?

ANSWER:

See Answer to Interrogatory No. 63, which is incorporated herein as if fully rewritten.

INTERROGATORY NO. 65:

If your Answer to Interrogatory No. 64 is "yes," identify each and every product upon which such a warning was placed, and with respect to each such product identified:

(a) State the date on which any order directing that a warning be placed on said product first issued;

(b) Identify any and all persons participating in the decision to issue that order;

(c) State the first date on which such warning was actually placed on said product;

(d) State the first date on which such product accompanied by such warning was first sold, distributed or installed;

(e) State the exact wording of this first warning;

(f) State the exact location and size of this first warning as it appeared on said product;