

ANSWER:

Products had labels, tags and/or stamped marks including some or all of the following: part number, the name "Warner Electric," electrical specifications, manufacturing location codes, date codes. Defendant currently believes that labels or tags and/or stamps were first used in the 1920's or 1930's. They were being used at the time of sale to Buyer.

INTERROGATORY NO. 31:

Was each of the asbestos-containing products listed in response to Interrogatory No. 19 generally expected to reach, or was each packaged to reach, the consumer or user, without substantial change in the condition in which it was sold?

ANSWER:

Objection: "Consumers" is a term that may not apply to Warner Electric Brake & Clutch Company products. The customers were original equipment manufacturers who incorporated Warner Electric Brake & Clutch Company products into machines or the operation of machines. To the extent that electric clutches and brakes required service or replacement and the product was purchased from a distributor, trained technicians normally would service or replace the electric clutch and/or brake. Subject to and without waiving objections, yes.

INTERROGATORY NO. 32:

If your Answer to Interrogatory No. 31 is "no" with respect to any product(s), explain in what manner Defendant claims said product(s) were altered or substantially changed after sale or distribution and before reaching the consumer or user.