

1 RESPONSE TO INTERROGATORY NO. 67:

2 Wagner is unable to respond to this Interrogatory due
3 to the lack of a definition of the phrase "threshold limit val-
4 ue" and the lack of a description of the application of the
5 threshold limit value to users of Wagner products.

6 INTERPOGATORY NO. 68:

7 Describe what action was taken by defendant prior to
8 1972, to determine whether the concentration of airborne asbes-
9 tos fibers during normal use, application or repair of its as-
10 bestos-containing products was below the TLV. Include in your
11 answer the date the above-described actions were taken by defen-
12 dant.

13 RESPONSE TO INTERROGATORY NO. 68:

14 Wagner is unable to respond to this Interrogatory due
15 to the lack of a definition of the phrase "threshold limit
16 value" and the lack of a description of the application of the
17 threshold limit value to users of Wagner products.

18 INTERROGATORY NO. 69:

19 Describe the manner in which defendant recommended
20 that its asbestos-containing products be cut, ground, sawed,
21 beveled, fabricated, mixed and/or prepared for use since 1930 by
22 its users.

23 RESPONSE TO INTERROGATORY NO. 69:

24 Wagner objects to this Interrogatory to the extent
25 that it seeks information outside the plaintiff's alleged expo-
26 sure period. Subject to that objection, Wagner states that they
27 began informing mechanics and their employees that Wagner cam-
28 ground brake shoes were shaped to exact tolerances and should
not be ground before application. See Wagner's response to
Interrogatory No. 46.