

1
2 otherwise stated, identify what brake pads,
3 brake linings or brake facings went into which
4 of your motor vehicles during the period 1950
5 through 1978;

6 (k) State when and how you were first made aware of
7 health hazards associated with the use of
8 asbestos;

9 (l) When did you first become aware that warnings
10 were placed on asbestos products with respect to
11 the health hazards associated with the use of
12 asbestos;

13 (m) When did you first learn in any manner or from
14 any source that asbestos or asbestos products
15 are hazardous or dangerous to the health of
16 persons;

17 (n) From whom did you learn the information referred
18 to in the answer to the preceding interrogatory;

19 (o) State what documents reflect the information
20 given in answer to the two preceding
21 interrogatories, their date, and the present
22 custodian of said records;

23 (p) Did you at any time maintain or distribute
24 manuals, instructions or information relating to
25 the sale, use or removal of asbestos or asbestos
26 products, including, but not limited to, the use
or removal of asbestos-containing brake linings,
brake pads or brake facings;

(q) If the answer to the preceding interrogatory is
in the affirmative, state the present location
of records or other such materials and the name
and address of the custodian of said manuals,
instructions, directories or information.