

ANSWER: See answer to Interrogatory Number 61, which is incorporated herein as if fully rewritten.

INTERROGATORY NO. 63:

Did Defendant, any related company, or any predecessor at any time, give to persons, who would be applying and/or removing any of the products listed in response to Interrogatory Nos. 19 and 42, any instructions or guidelines concerning precautions, warnings, procedures, and/or methods to use, in order to safely apply or remove such products? If so, describe such instructions, state to whom they were given, state the dates they were given, and describe the manner in which they were given.

ANSWER: Yes. Specifically regarding asbestos, the United States government warning regulations did not apply to asbestos containing clutch products. Historical, medical and scientific evidence did not support a risk of harm from clutch products. Material safety data sheets were provided upon a customer's request.

Beginning in the early 1970s, OSHA regulations required work place precautions regarding excessive exposure to asbestos. Lipe Corporation made a concerted effort to fully comply with the regulations and reasonably expected its industrial customers to comply as well. Lipe's products did not require the worker actually handling the product to either cut, sand, mix or interact with the product so as to create the release of any asbestos fiber or dust from the product. However, upon information and belief, warnings concerning asbestos were first used by Lipe on its asbestos-containing clutch products commencing in June 1986. This warning label was as follows: