

1 (a) the date(s) defendant's automobile undercoat
2 sealer was sold or delivered to said distributor;

3 (b) the quantity and type, including trade or
4 brand name(s) of defendant's automobile undercoat
5 sealer sold or delivered to said distributor.

6 RESPONSE TO INTERROGATORY NO. 113:

7 See Wagner's response to Interrogatory No. 111.

8 INTERROGATORY NO. 114:

9 Has defendant directly or indirectly sold or distrib-
10 uted its automobile undercoat sealer to any of the following:

- 11 (a) Chrysler-Plymouth Corp.;
12 (b) Ford Motor Company;
13 (c) General Motors;
14 (d) American Motors;
15 (e) Nissan Motors;
16 (f) Mitsubishi Motor Car Division;
17 (g) Volkswagen;
18 (h) British Leyland;
19 (i) Sears & Roebuck.

20 RESPONSE TO INTERROGATORY NO. 114:

21 See Wagner's response to Interrogatory No. 111.

22 INTERROGATORY NO. 115:

23 If your answer to any part of Interrogatory No. 114 is
24 affirmative, include as a part of your answer:

25 (a) the date(s) during which defendant's automo-
26 bile undercoat sealer was sole or distributed to each
27 entity;

28 (b) the quantity and type, including trade or
29 brand name, of defendant's automobile undercoat sealer
30 sold or distributed to each entity;

31 (c) the identity of each employee or ex-employee
32 having knowledge of the sales and distributions to
33 each entity.

34 RESPONSE TO INTERROGATORY NO. 115:

35 See Wagner's response to Interrogatory No. 114.

36 INTERROGATORY NO. 116:

37 Does defendant have or posses any data or information
38 regarding any shipments, sales or distributions of automobile