

Electric Brake & Clutch Company ceased manufacturing wheel brakes with friction material that contained asbestos.

At the time of conversion to non-asbestos friction material, to the extent Warner Electric Brake & Clutch Company had both historical friction materials in its product inventory and known non-asbestos friction materials in its product inventory, the packaging for the known non-asbestos products was stamped "NA." Warner Electric Brake & Clutch Company disposed of unused friction materials inventory after the date it no longer manufactured products with asbestos-containing friction materials.

Defendant believes that the last date of sale for clutches, brakes and clutch/brakes with asbestos-containing friction materials was the end of 1986 or early 1987. Defendant believes that the last date of sale for wheel brakes with asbestos-containing friction materials was 1992.

INTERROGATORY NO. 17:

State the first and last dates on which any asbestos-containing product was specified, sold, distributed, applied and/or installed within the United States by:

- (a) Defendant;
- (b) each and every predecessor; and,
- (c) each and every related company.

ANSWER:

See Answers to Interrogatory Nos. 16 and 19, which are incorporated herein as if fully rewritten.