B16. Did any of the entities from whom you received asbestos fiber or any of the entities referred to in B6, B7, B9 and B10 ever inform you or your company's employees that asbestos was potentially hazardous to the health of individuals who were exposed to it?

ANSWER: Asbestos related disease from certain raw asbestos fibers has been recognized for the past 20 years but Chrysler has no records of specific meetings or dates such information was received. Chrysler Motors Corporation has no information that brake dust to which plaintiff allegedly was exposed was potentially hazardous to the health.

B17. If so, for each such company that transmitted such information to you and your company, set forth the following information:

ANSWER: Chrysler Motors Corporation has no knowledge and maintains no records regarding what transpired at meetings regarding health hazards of asbestos from certain raw asbestos fibers.

(a) The name of each and every entity that informed your company that asbestos was potentially hazardous to health;

ANSWER: N/A

(b) The dates you received this information from each such company;

ANSWER: N/A

(c) Indicate how this information was transmitted to you;

ANSWER: N/A

(d) The substance of each warning;

ANSWER: N/A

(e) Annex hereto copies of each such warning.

ANSWER: None.

B18. Has defendant distributed or sold asbestos or asbestos containing products in the State of New Jersey? If so, set forth the following information:

ANSWER: Yes.

(a) The date that defendant commenced selling asbestos or asbestos containing products in the State of New Jersey;

ANSWER: Every Chrysler car contains asbestos in some form or other.

(b) The date the defendant terminated the sale of asbestos or asbestos containing products in the State of New Jersey;

ANSWER: Not applicable. Sale has not been terminated.

(c) The areas of New Jersey where asbestos or asbestos containing products were sold.

ANSWER: Brake linings account for most of these asbestos material since 1959.