replace the old (the name of all suppliers and manufacturers);

(d) indicate whether the answering defendant ever provided this entity with a specification or formula sheet for the manufacture or selection of the asbestos brake linings. If so provide a copy of same.

(e) indicate whether this entity ever provided the answering defendant ever with a specification or formula setting forth any of the constituent ingredients of the asbestos brake linings it was using to reline. If so provide a copy of same.

(f) is the answering defendant in possession of any contracts or agreements for the relining of brake shoes with this entity or entities. If so provide a copy of same.

(g) is the defendant in possession of any purchase orders, receipts, memorandum or other written records regarding the relining of brake shoes by this entity or entities? If so provide a copy of same.

(h) is the defendant in possession of any blueprints or design drawings for asbestos brake linings used by this entity or entities? If so provide a copy of same.

(i) set forth the type and amount of asbestos per lining(indicate by weight or volume.

ANSWER:

OBJECTION. Eaton did not collect used brake shoes. Without waiving this objection, no.

Interrogatory No. 34

Did the defendant ever issue a recall notice or recall any previously sold brake shoes or linings by solely by virtue of the fact that it had been sold with an asbestos containing lining. If so indicate when such recall took place and provide a copy of all notices.

ANSWER:

No.

Interrogatory No. 35

Did any brake shoe with an asbestos containing brake linings installed by the answering defendant as a component part of an axle ever have any labeling directly upon the brake shoe