

ANSWER:

Warner Electric Brake (& Clutch) Company began manufacturing electric wheel brakes before 1930. Friction components were shoe/linings and magnet facings.

Some time after the Second World War, Warner Electric Brake & Clutch Company began manufacturing electric clutches, electric brakes and electric clutch/brakes. Friction components were magnets and rotor facings. *See also* Answer to Interrogatory No. 25, which is incorporated herein as if fully rewritten.

Friction suppliers were required to meet Warner Electric Brake & Clutch Company performance standards. Some friction suppliers for some time apparently considered the composition and physical properties of their friction materials to be proprietary information. Warner Electric Brake & Clutch Company did not specify composition or other physical properties of the friction material; rather it tested a vendor's product by code number and if it met Warner Electric Brake & Clutch Company specifications, the Company would order the material by vendor code number rather than by specifying its composition or other physical properties. Therefore, Warner Electric Brake & Clutch Company, in some cases, did not know, but assumed from what it and others in its industry knew of the friction materials industry, that asbestos to some extent was an ingredient in friction materials. Indeed, the Federal Specifications (e.g. KKK-L-370c (1966) at 3.3.1) for friction materials (linings) for clutches and brakes sold to the federal government required an asbestos-metallic wearing layer.

Warner Electric Brake & Clutch Company in the 1970-80's began to seek out and test non-asbestos friction materials. Some clutches, brakes and clutch/brakes did not contain friction materials. In the Spring of 1986, Warner Electric ceased manufacturing clutches, brakes, and clutch/brakes with friction material that contained asbestos as a component. By or in 1992, Warner