

The word "CAUTION" was in no smaller than 12 point type. The rest of the words were in no smaller than 10 point type. GM specified a minimum size. The caution was changed beginning in 1989 to:

"Danger: Contains asbestos fibers. Avoid creating dust. Cancer and Lung Disease hazard. Do not grind. Do not clean with compressed air. * See Service Manual Instructions *"

Starting in 1977, General Motors included this statement in its service manuals:

"Caution: When servicing wheel brake parts, do not create dust by grinding or sanding brake linings or by cleaning wheel brake parts with a dry brush or with compressed air. (A water dampened cloth should be used.) Many wheel brake parts contain asbestos fibers which can become airborne if dust is created during servicing. Breathing dust containing asbestos fibers may cause serious bodily harm."

Starting in 1981, the statement was changed to:

CAUTION: When servicing wheel brake parts, do not create dust by grinding, sanding brake linings, or by cleaning wheel brake parts with a dry brush or with compressed air. Many wheel brake parts contain asbestos fiber which can become airborne if dust is created during servicing. Breathing dust containing asbestos fiber may cause serious bodily harm. A water dampened cloth or water based solution should be used to remove any dust on brake parts. Equipment is commercially available to perform this washing function. These wet methods will prevent asbestos fibers from becoming airborne.

INTERROGATORY NO. 15:

Before 1970, had you received notice that any individual or individuals, other than those Plaintiffs who have filed personal injury actions in Texas State Courts is or are claiming or has or have claimed an injury as a result of using asbestos products manufactured and/or sold by your company or any of its predecessors or subsidiaries before 1970? If so, state:

- (a) The name and address of each claimant.