REQUEST FOR PRODUCTION N: Pursuant to CR 34, you are hereby requested to produce according to the above instructions a copy of all documents pertaining to design changes as identified in your response to the preceding interrogatory.

RESPONSE: N/A

SECTION 3.0

3.01 Did you provide instructions and/or warnings concerning the potential health hazards of asbestos exposure to plaintiff's employer Stewart-Western, Inc. or Western Brake Ind. Company at any time?

ANSWER: No. S. K. Wellman has no record of any sale of products to the listed companies.

3.02 If the answer to the preceding interrogatory is in the affirmative, state the following:

(a) Whether the employer was expected or requested to transfer the instructions and/or warnings to its employees such as plaintiff;

(b) The date(s) you provided instructions and/or warnings to plaintiff's employer;