

20. With respect to any and all automobile asbestos products which were ever manufactured, distributed, or sold by this party: state whether any instructions, warnings, recommendations, cautions, operational instructions, maintenance schedules or repair schedules (hereinafter referred to as communications) were ever transmitted to automobile salespersons, automobile service workers, automobile manufacturers, auto parts purchasers, or any other foreseeable user of said asbestos product(s). If so, state:

a. the date each communication was first drafted;

We labeled the containers our products were shipped in according to specifications set forth by OSHA.

b. the date each communication was first communicated;

Not applicable.

c. the means of transmittal of each communication;

Not applicable.

d. the product each communication was in reference to;

Not applicable.

e. the verbatim content of each communication;  
Caution - Contains Asbestos Fibers. Avoid Creating Dust.  
Breathing Asbestos Dust May Cause Bodily Harm.

f. the size, shape and color of each communication;

Size and shape vary by size of package. The color is in contrast to the container.

g. what the communication was attached or affixed to;

The carton or box the product was shipped in.

h. if the communication was changed at any time; and if so, state the reason for the change, the date of the change, and the substance of the change;

No change.

i. the name and address of the person or entity who attached or affixed each said communication to the said product, or to the container in which said product is contained;

By the box or carton vendor or by internal labeling.

j. the inclusive dates each such communication was utilized by defendant;

1973 through present.