

1 (111) The years during which asbestos fiber was
2 included in the composition of the brake linings
under each trade or brand name;

3 RESPONSE TO INTERROGATORY NO. 119.

4 (a)-(b) See Wagner's response to Interrogatory No.
5 10(a)-(b).

6 (c) See Wagner's response to Interrogatory No. 10(c).

7 (d)-(e) See Wagner's response to Interrogatory No.
8 10(d)-(e).

9 (f) Wagner brake products have been assembled at
10 various bonding shops throughout the country.

11 INTERROGATORY NO. 120:

12 Identify all distributors of defendant's automobile
13 brake linings or brake assemblies in and for the State of Cali-
fornia, and for each distributor, state:

14 (a) the date(s) defendant's automobile brake
15 linings or brake assemblies were sold or delivered to
said distributor;

16 (b) the quantity and type, including trade or
17 brand name(s), of defendant's automobile brake linings
and brake assemblies sold or delivered to said dis-
tributor.

18 RESPONSE TO INTERROGATORY NO. 120:

19 Wagner objects to this interrogatory on the grounds
20 that it is overly broad, unduly burdensome and not calculated to
21 lead to the discovery of admissible evidence and seeps propri-
22 etary business information.

23 INTERROGATORY NO. 121:

24 Has defendant directly or indirectly sold or distrib-
25 uted its automobile brake linings or brake assemblies to any of
the following:

- 26 (a) Chrysler-Plymouth Corp.;
27 (b) Ford Motor Company;
(c) General Motors;
28 (d) American Motors;