

g) State whether any industrial psychologists or human factors engineers were consulted prior to utilizing such warnings, cautions, etc.

ANSWER: No, not to present knowledge.

5. Have you received notice that any other person including any of your employees have claimed injury as a result of using asbestos products manufactured by your company.

ANSWER: Yes.

6. Please describe in detail the type of packages in which Defendant has sold asbestos material, listing the dates each type of package was used, a physical description thereof, a description of any printed material or trademarks that appeared thereon and a description of any warning or warning labels that appeared thereon.

ANSWER: Presently, parts are packaged in axle set boxes containing 4 or 8 pieces of lining. These are then packed in a carton containing from 2 to 12 axle sets; Bulk pieces are packed in a carton containing from 25 to 200 pieces of brake lining. Large bulk orders are packed in Gaylords, containers designed to fit a 36" x 48" pallet which is 24" deep. Axle set boxes are preprinted with artwork associated with American Brakeblok or Abex, some boxes are plain corrugated and labelled or stenciled. Dates of use are unknown. See Answers to Interrogatory No. 4(b)-(d) above.