

Given the information published by the government and other sources, all companies that purchased products that contained asbestos were aware of the risks associated with high levels of exposure (then thought to be in the range of two to five fibers per cc). Although Warner Electric Brake & Clutch Company products did not require warnings because their use did not exceed the TLV or PEL, the information provided by the government was the best available as to the potential hazards of exposure to asbestos and was, by law, required to be provided to all persons who might be exposed. *See also* Answer to Interrogatory No. 84, which is incorporated herein as if fully rewritten.

INTERROGATORY NO. 79:

State the date on which any official of Defendant or its predecessor(s) first had knowledge, notice, information or understanding that exposure to asbestos would, could or might cause each of the following diseases:

- (a) Pleural disease;
- (b) Asbestosis;
- (c) Mesothelioma;
- (d) Lung cancer;
- (e) Any other forms of cancer.

ANSWER:

Defendant is not aware of the answer to this interrogatory as it relates to Warner Electric Brake & Clutch Company. Although it is not possible to answer this interrogatory with any degree of certainty, Defendant understands that as early as the 1930's, it was known or knowable that