ANSWER: No. S. K. Wellman contends and we believe that the evidence establishes that plaintiff never used any asbestos-containing product of S. K. Wellman.

5.14 If your answer to the preceding interrogatory is in the affirmative:

(a) Specifically indicate the nature of the conduct;

(b) Identify each document which in any way bears upon this issue;

(c) Specifically identify any eye-witness or other person who has information of any kind concerning such contention.

ANSWER: See 5.13 above.

5.15 Do you contend that the plaintiff or any other person materially altered your asbestos-containing products prior to their use by the plaintiff?

ANSWER: Unknown as to "any other person", and as to plaintiff see 5.13 above.