

(i) whether the answering defendant ever purchased brake shoes with asbestos containing brake linings from H.K. Porter. If so indicate:

(i) the first year that brake shoes with asbestos brake linings were purchased from this supplier;

(ii) the last year that brake shoes with asbestos brake linings were purchased from this supplier;

(iii) whether the answering defendant ever provided this supplier with a specification or formula sheet for the manufacture of brake shoes with asbestos brake linings. If so provide a copy of same;

(iv) whether the supplier of the brake shoes with asbestos brake linings ever provided the answering defendant ever with a specification or formula setting forth any of the constituent ingredients of the asbestos brake linings. If so provide a copy of same;

(v) is the answering defendant in possession of any contracts or agreements to buy brake shoes with asbestos containing brake linings from this supplier. If so provide a copy of same;

(vi) is the defendant in possession of any purchase orders, receipts, memorandum or other written records regarding the purchase of brake shoes with asbestos brake linings from this provider If so provide a copy of same;

(vii) is the defendant in possession of any blueprints or design drawings for brake shoes with asbestos brake linings from this provider If so provide a copy of same;

(viii) set forth the type and amount of asbestos per lining(indicate by weight or volume;

(ix) did the name H.K. Porter ever appear on the metal portion of the shoe or the lining itself at the time it was sold by the answering defendant. If so where on the lining did it appear and during what years;

(x) set forth the color of the lining.

(j) whether the answering defendant ever purchased brake shoes with asbestos containing brake linings from Maremont. If so indicate:

(i) the first year that brake shoes with asbestos brake linings were purchased from this supplier;

(ii) the last year that brake shoes with asbestos brake linings were purchased from this supplier;

(iii) whether the answering defendant ever provided this supplier with a specification or