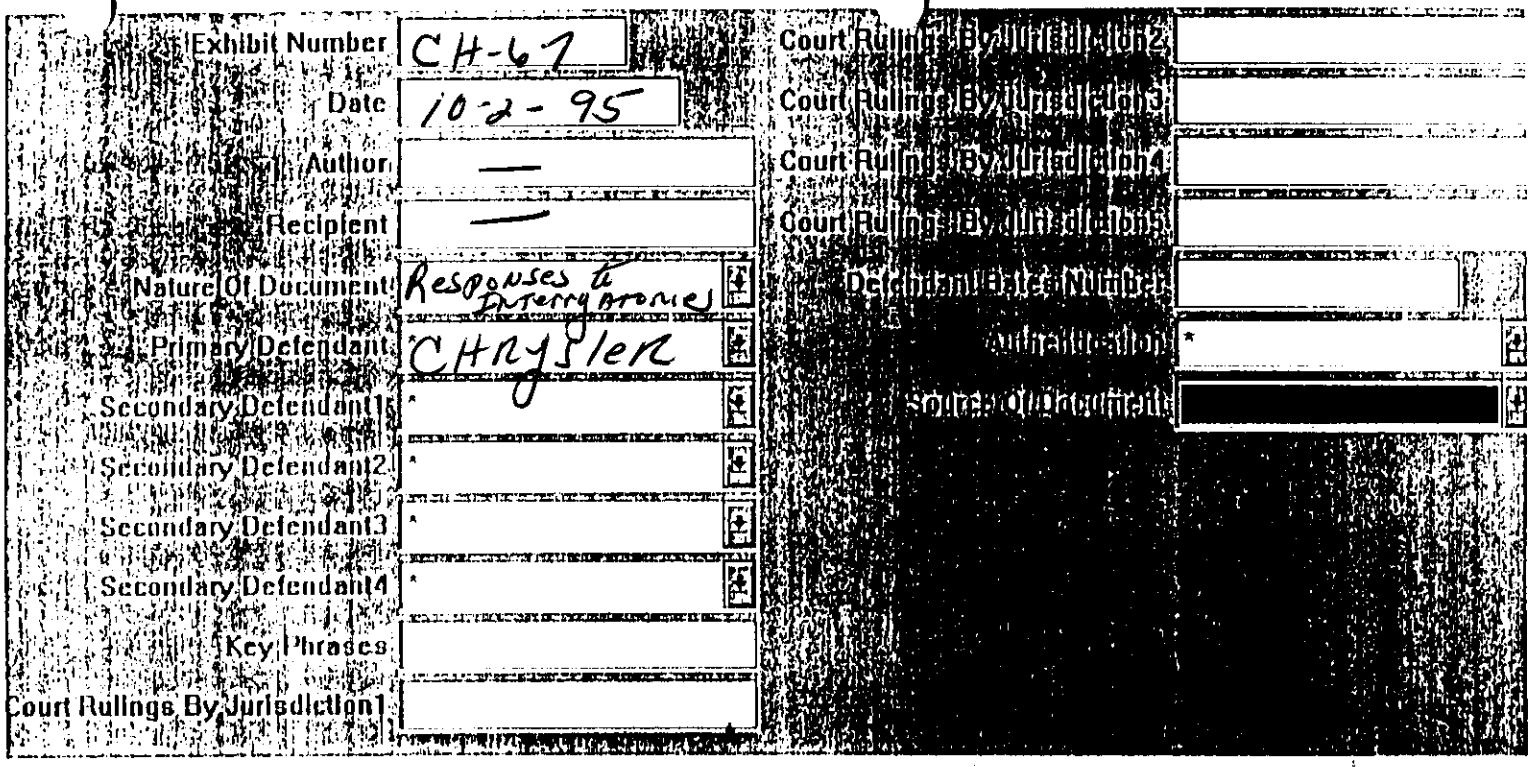

Nature of Document

MEMO
SPEECHES
OUTLINES
REPORTS
PRODUCT CATALOG
MINUTES
ARTICLE
ADVERTISEMENT
INVOICE
MEDICAL ARTICLE
COMP CLAIM
INTERROGATORY ANSWERS
GOVERNMENT DOCUMENTS
LETTER
OTHER COMPANY DOCUMENTS

Defendant

PITTSBURGH CORNING
PPG
UNIROYAL
RAPID AMERICA
METROPOLITAN LIFE
FOSECO
NARCO
GREFCO
OCF
WESTINGHOUSE
INSUL
UNIVERSAL
CHICAGO FIREBRICK

Authentication

ANCIENT DOCUMENTS
PUBLIC RECORDS-SEAL
WITNESS TESTIMONY
DEFENDANT ADMISSION

Source of Document

DEFENDANT
THIRD PARTY-GOVT SOURCE
THIRD PARTY-OTHER DEFENDANT
THIRD PARTY-NON DEFENDANT

IN THE CIRCUIT COURT OF THE
11TH JUDICIAL CIRCUIT IN AND
FOR DADE COUNTY, FLORIDA

GENERAL JURISDICTION DIVISION

CASE NO.: 95-10261 CA 42

TIMOTHY TINKER and ANN TINKER,
his wife,

Plaintiffs,

-vs-

CHRYSLER CORPORATION, BEAVER
DAM PRODUCTS CORPORATION formerly
known as Chrysler Marine
Corporation, et. al.

Defendants .

NOTICE OF SERVICE OF DEFENDANT'S, CHRYSLER CORPORATION, RESPONSES TO MASTER PRELIMINARY INTERROGATORIES

Defendant, **CHRYSLER CORPORATION**, through undersigned counsel hereby gives Notice of Service of its Responses to Master Preliminary Interrogatories dated June 29, 1995.

HERZFELD & RUBIN
Suite 400
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(305) 772-3599
Attorneys for Chrysler Corporation
and Beaver Dam Products Corporation

BY: _____
DAVID I. WEISS
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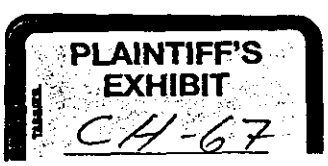

CERTIFICATE OF SERVICE

WE HEREBY CERTIFY that a true and correct copy of the foregoing was this 2nd day of October, 1995, delivered by mail to **DAVID LIPMAN, ESQUIRE, Counsel for Plaintiff**, 5901 S.W. 74th Street, Suite 304, Miami, Florida 33143.

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BY: _____
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** ALSO ADMITTED IN COLORADO

OF COUNSEL
MARVIN I. WIENER, P.A.
BRIAN E. INGALLS
GREGORY J. RITTER

October 2, 1995

TO ALL COUNSEL:

RE: Tinker v. Chrysler Corporation et. al
Our File No.: 0303.8112

On this date Chrysler Corporation served its Responses to Master Preliminary Interrogatories and Request for Production. If you would like a copy of these responses, please telephone the offices of the undersigned in order to receive same.

Very truly yours,

DAVID I. WEISS

DIW/nr
Enclosures

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IN THE CIRCUIT COURT OF THE
11TH JUDICIAL CIRCUIT IN AND
FOR DADE COUNTY, FLORIDA

GENERAL JURISDICTION DIVISION

CASE NO.: 95-10261 CA 42

TIMOTHY TINKER and ANN TINKER,
his wife,

Plaintiffs,

-vs-

CHRYSLER CORPORATION, BEAVER
DAM PRODUCTS CORPORATION formerly
known as Chrysler Marine
Corporation, et. al.

Defendants .
_____/

CHRYSLER CORPORATION'S RESPONSES TO PLAINTIFF'S FIRST REQUEST TO PRODUCE

Defendant, **CHRYSLER CORPORATION**, through undersigned counsel hereby files its responses to Plaintiffs' Request for Production as follows:

1. To the extent this request calls for the production of all documents related to the subject matter of this lawsuit, Chrysler Corporation objects on the grounds that this request is unduly burdensome, overly broad and lacks particularity.

2. Chrysler Corporation objects to this request on the grounds of lack of relevance, and because it is unduly burdensome, overly broad, lacks particularity and is premature.

3. Chrysler Corporation objects to this request on the grounds of lack of relevance, and because it is unduly burdensome, overly broad, and is premature.

4. Chrysler Corporation objects to this request on the grounds that it is unduly burdensome, overly broad and makes improper assumptions.

5. Chrysler Corporation objects to this request on grounds of lack of relevance, and because it is unduly burdensome, overly broad, makes improper assumptions, and is premature.

6. Chrysler Corporation objects to this request on grounds of lack of relevance, and because it is unduly burdensome, overly broad, lacks particularity and is premature.

7. Chrysler Corporation objects to this request on grounds of lack of relevance, and because it is unduly burdensome, overly broad, lacks particularity and is premature.

8. Chrysler Corporation objects to this request because of lack of relevance and because it is unduly burdensome, overly broad, lacks particularity, contains improper assumptions and is premature.

9. Chrysler Corporation objects to this request on the grounds of lack of relevance, and because it is unduly burdensome, overly broad, lacks particularity and is premature.

10. Chrysler Corporation objects to this request on the grounds that it is unduly burdensome, overly broad, contains improper assumptions and lacks particularity.

11. Chrysler Corporation objects to this request on the grounds that it is unduly burdensome, overly broad, lacks particularity and may call for the production of the privileged information.

12. Chrysler Corporation objects to this request because of lack of relevance and because it is unduly burdensome, overly broad, lacks particularity, contains improper assumptions and is premature.

13. Chrysler Corporation objects to this request on grounds of lack of relevance, and because the request is unduly burdensome, overly broad, lacks particularity and may call for the production of privileged information.

14. Chrysler Corporation objects to this request on grounds that it is unduly burdensome, overly broad, lacks particularity and makes improper assumptions.

15. Chrysler Corporation objects to this request on the grounds that it is unduly burdensome, overly broad, lacks particularity and makes improper assumption.

16. Chrysler Corporation objects to this request on grounds of lack of relevance and because the request is unduly burdensome, overly broad, lacks particularity and makes improper assumptions.

17. Chrysler Corporation objects to this request on grounds of lack of relevance and because the request is unduly burdensome, overly broad, lacks particularity and is premature.

18. Chrysler Corporation objects to this request on grounds of lack of relevance and because the request is unduly burdensome, overly broad, lacks particularity and is premature.

19. Chrysler Corporation objects to this request on grounds of lack of relevance and because it is unduly burdensome, overly broad, lacks particularity and is premature.

20. Chrysler Corporations to this request on grounds of lack of relevance and because it is unduly burdensome, overly broad, lacks particularity and is premature.

21. Chrysler Corporation objects to this request on grounds of lack of relevance and because it is unduly burdensome, overly broad, lacks particularity and is premature.

22. Chrysler Corporation objects to this request on grounds of lack of relevance, and because it is unduly burdensome, overly broad, lacks particularity, makes improper assumptions, may call for the production of privileged information and is premature.

23. Chrysler Corporation objects to this request on grounds that it is unintelligible. To the extent request number 23 requests the creation of a document, such request is beyond the parameters of Florida Rule of Civil Procedure 1.350. Chrysler Corporation also objects to this request to the extent it calls for the creation of a privileged log on grounds that it is unduly burdensome, overly broad and premature at this stage of the discovery process.

24. Chrysler Corporation objects to this request on the grounds that it is unduly burdensome, overly broad, lacks particularity and may call for the production of privileged information.

HERZFELD & RUBIN
Suite 400
1901 W. Cypress Creek Road
Fort Lauderdale, Florida 33309
(305) 772-3599
Attorneys for Chrysler Corporation
and Beaver Dam Products Corporation

BY: _____
DAVID I. WEISS
Fla. Bar No. 656976

CERTIFICATE OF SERVICE

WE HEREBY CERTIFY that a true and correct copy of the foregoing was this 2nd day of October, 1995, delivered to **DAVID LIPMAN, ESQUIRE, Counsel for Plaintiffs,** 5901 S.W. 74th Street, Suite 304, Miami, Florida.

HERZFELD & RUBIN
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(305) 772-3599
Attorneys for Chrysler Corp.
and Beaver Dam Products Corp.

BY: _____
DAVID I. WEISS
Fla. Bar No. 656976

PRELIMINARY INTERROGATORIES

1. **Data Sources**

Please identify each person with whom you consulted or who provided information used in answering these Interrogatories on behalf of Defendant. Additionally, provide the subject matter category that each person provided information for from the following categories if appropriate:

1. Corporate History
2. Product Information
3. Warnings/Knowledge of Potential Danger/State of the Art/Testing/Medical or Scientific

Identify each person's:

A. Address;
B. Position with the Defendant;

Answer:

The responses to these interrogatories are provided with assistance of counsel for Chrysler Corporation. Mr. Kelly's position with Chrysler Corporation is Parts Marketing Manager. Mr. Kelly is available through Herzfeld & Rubin, 801 Brickell Avenue, Suite 1501, Miami, Florida 33131.

2. **Corporate Information**

Please state the following:

A. This defendant's correct corporate name;

Answer:

Chrysler Corporation

B. The state of your incorporation;

Answer:

Delaware

C. The address of your principal place of business;

Answer:

12000 Chrysler Drive
Highland Park, Michigan 48288

D. The dates and time period during which defendant held a certificate of authority to do business in the state of Florida;

Answer:

Objection, overbroad without relation to the facts set forth in the Complaint.

E. The dates and time period during which defendant regularly conducted business in Florida.

Answer:

Objection, overbroad without relation to the facts set forth in the Complaint.

3. **Corporate History**

Describe in detail Defendant's complete corporate or business history for all associated business entities that were involved, in any manner, in the sale, manufacture, distribution, and/or mining of asbestos and/or asbestos containing products, including dates of incorporation, mergers, consolidations, reincorporations, and the like. Also provide historical information regarding all predecessors, prior names, asset purchases, acquisitions or spin-offs for all associated business entities that were involved, in any manner, in the sale, manufacture, distribution, and/or mining of asbestos and/or asbestos containing products. In addition:

A. If defendant or any of its predecessors or subsidiaries at any time purchased or assumed any of the assets and/or liabilities of any corporation or entity which at any prior time engaged in the manufacturing or sale of asbestos-containing products, then please state the following as to each acquisition:

1. The name or description of each corporation, entity or assets acquired by Defendant, that entity's state of incorporation and principal place of business, its date of incorporation, and the name of Defendant at the time of acquisition;

2. The manner by which each such corporation, entity or interest therein, was acquired (e.g., merger consolidation, change of name, stock sale, transfer or purchase of assets or product line);

3. The date of each such acquisition;

4. The state in which each such acquisition was effected;

5. The state law governing each such acquisition if specified by contract and

6. How the business or financial interest in that corporation or entity ended, if it ended. (e.g. dissolved the company, sold all stock, placed subsidiary in bankruptcy, etc.)

7. List all states where entity is or was registered to do business, including the dates of registration for each state.

Answer:

Chrysler objects to this Interrogatory on the grounds that it is overbroad and not reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving the foregoing objection, Chrysler states that the current legal name under which it does business is Chrysler Corporation. Chrysler Corporation was incorporated on June 6, 1925. Chrysler Corporation is authorized to do business in every state of the United States. Chrysler Corporation has had many subsidiary corporations since 1925, none of which would have any bearing to this litigation.

4. **Asbestos Mining**

Did Defendant, prior to 1980, engage in the mining, milling and/or subsequent sale of asbestos fiber? If so, please state?

Answer:

No.

A. The date such activity began;

Not applicable.

B. The years during which such activity took place;

Not applicable.

C. If such activity was terminated;

Not applicable.

D. If such activity was terminated, the reason why;

Not applicable.

E. Within in the United States was there any geographic limitation which you claim was applicable to the sales of your asbestos (Yes or No)?

Not applicable.

F. Identify the organizational unit of Defendant so engaged.

Not applicable.

G. Type of asbestos mined.

Not applicable.

H. Managers of each mine and years of service.

Not applicable.

I. Identify sales and shipment records from each mine.

Not applicable.

5. **Asbestos/Manufacture**

Has Defendant at any time, engaged in the manufacture of any asbestos containing product which generic product type has been previously identified in exposure sheets in this circuit? If so, please state:

A. The date such activity began;

Answer:

Objection. This question is unduly burdensome, vague and overbroad and harassing and is not likely to lead to admissible evidence. Notwithstanding this objection, Chrysler understands brake linings and clutch facings have contained asbestos. From 1959 to 1988 Chrysler Corporation manufactured brake linings at a Chrysler plant in addition to purchasing brake linings from other suppliers. Chrysler never manufactured clutch facings.

B. The years during which such activity took place;

Answer:

See response to Interrogatory 5(a) above.

C. If such activity was terminated;

Answer:

See response to Interrogatory 5(a) above.

D. If such activity was terminated, the reason why;

Answer:

Chrysler discontinued manufacture of brake linings in 1988 for economic reasons and shut down a plant based upon a reduction of the work force and expenses.

E. Within in the United States was there any geographic limitation which you claim was applicable to the sales of your asbestos (Yes or No)?

Answer:

Not applicable. Chrysler did not sell asbestos

If Yes state the geographical area into which you claim your asbestos containing products were sold; and

F. Identify the organizational unit of Defendant so engaged.

Answer:

Not applicable. Chrysler did not sell asbestos.

6. **Asbestos/Sales**

Has Defendant at any time, engaged in the marketing and/or sale of any asbestos containing product which generic product type has been previously identified in exposure sheets in this circuit? If so, please state:

A. The date such activity began;

Answer:

See response to Interrogatory 5(a) above.

B. The years during which such activity took place;

Answer:

See response to Interrogatory 5(a) above.

C. If such activity was terminated;

Answer:

See response to Interrogatory 5(a) above.

D. If such activity was terminated, the reason why;

Answer:

See response to Interrogatory 5(a) above.

E. Within in the United States was there any geographic limitation which you claim was applicable to the sales of your asbestos (Yes or No)?

Answer:

See response to Interrogatory 5(a) above.

F. Identify the organizational unit of Defendant so engaged.

Answer:

See response to Interrogatory 5(a) above.

G. Identify all sales managers and the years during which they served.

Answer:

See response to Interrogatory 5(a) above.

7. **Asbestos/Distributor**

Has Defendant at any time, engaged in the marketing and/or sale of any asbestos containing product, which generic product type has been previously identified in exposure sheets in this circuit, manufactured in whole or in part by an unrelated business entity? If so, please state:

A. The name and address of the unrelated business entity;

Answer:

See response to Interrogatory 5(a) above.

B. The product's trade and/or brand name;

Answer:

See response to Interrogatory 5(a) above.

C. The years during which such activity took place;

Answer:

See response to Interrogatory 5(a) above.

D. Identify the organizational unit of Defendant, or the associated business entity so engaged.

Answer:

See response to Interrogatory 5(a) above.

E. Within the United States was there any geographic limitation which you claim was applicable to each distributor and/or wholesaler (Yes or No)?

If Yes state the geographical area which you claim was applicable to each distributor and/or wholesaler; and

Answer:

See response to Interrogatory 5(a) above.

F. Whether there was a written distributorship agreement;

Answer:

See response to Interrogatory 5(a) above.

G. Whether distributorship was exclusive;

Answer:

See response to Interrogatory 5(a) above.

H. Identify all documents pertaining to the distributor or wholesaler relationship and the custodian thereof;

Answer:

See response to Interrogatory 5(a) above.

I. The ratio of sales to distributors compared to direct sales to consumers.

Answer:

See response to Interrogatory 5(a) above.

J. List of sales records or shipments to each distributor or wholesaler.

Answer:

See response to Interrogatory 5(a) above.

8. Has Defendant at any time, engaged in the rebranding of asbestos containing products, which generic product type has been previously identified in exposure sheets in this circuit, manufactured in whole or in part by an unrelated business entity? If so, please state:

A. The name and address of the unrelated business entity;

B. The product's original trade and/or brand name;

C. Who performed the physical rebranding and where it was accomplished;

D. The years during which such activity took place;

E. Brand name and/or trade name after the product was rebranded;

F. User or seller of the product after rebranding;

G. Identify the organizational unit of Defendant so engaged.

Answer:

Objection to the Interrogatory as vague, overbroad and without reference to the allegations in the Complaint against Chrysler Corporation

Without waiving this objection, this Defendant answers as follows: Products which were manufactured by entities other than Chrysler including brake linings and clutch facing were incorporated into Chrysler vehicles. Additionally, certain parts manufactured by entities other than Chrysler, would be packaged in after-market packages for sale to authorized dealers.

9. **Asbestos/Sales to Manufacturer**

Has Defendant at any time, engaged in the sale of asbestos containing products, which generic type has been previously identified in exposure sheets in this circuit, to an unrelated business entity that was engaged in the manufacture of asbestos containing products? If so, please state:

A. The name and address of the unrelated business entity;

B. The product's trade and/or brand name that was sold;

C. The years during which such activity took place;

D. Identify the organizational unit of Defendant so engaged.

E. List each sales office of your asbestos-containing products and for each please state:

(1) Name and address;
(2) Geographical areas for which each sales office was responsible;
(3) Identify all managers and the years during which they served;
(4) Identify all sales personnel and the years during which they served, and describe each person's sales jurisdiction or responsibility;
(5) Identify sales records or shipment records for each sales office and the custodian thereof.

Answer:

Objection, overbroad burdensome and harassing. Additionally, this Interrogatory requires Chrysler Corporation to engage in a massive review of each asbestos litigation file ever initiated in the 11th Judicial Circuit, Dade County, Florida.

10. **Asbestos/Sales to Government or Government Agencies**

Did this Defendant ever sell or cause to be sold any of its asbestos containing products, identified on exposure sheets filed in this circuit, to (1) the United States Government; (2) the United States Air Force; (3) Army Air Force; (4) United States Army; (5) United States Navy; (6) United States Marine Corps; (7) General Service Administration; (8) Department of Defense; or (9) or any other agency operated by the United States Government? If so, please provide the following:

A. The names and last known address of the governmental agency;

B. Whether there was a written contract or sales agreement;

C. Identify all documents pertaining to the governmental contracts or agreements and custodian of said documents;

D. Whether the formula used for the manufacture of the product was the same as the formula used for the manufacture, sale or distribution of the product to non-governmental customers;

E. The extent to which sales to governmental agencies were handled through distributors or wholesalers as opposed to direct sales by Defendant;

F. The extent to which the physical appearance of the product sold or distributed to a governmental agency differed from the physical appearance of the product sold or distributed to non-governmental customers;

G. The extent to which the packaging and/or labeling of the product sold or distributed to a governmental agency differed from the packaging or labeling of the product sold or distributed to non-governmental customers;

H. Identify Sales and shipment records for each governmental agency and the custodian thereof.

Answer:

Objection, overbroad without reference to allegations in Plaintiff's Complaint where Plaintiff fails to allege facts indicating Timothy Tinker ever served in the military.

11. **Asbestos/Sales Through Licensees**

If any of this Defendant's asbestos-containing products which generic product type has been previously identified in exposure sheets in this circuit, reached the consumer through licensees, please provide the following:

A. The name and last known address of licensees;

B. The years each licensee was licensed to sell, distribute or manufacture this Defendant's asbestos-containing products;

C. Within the United States was there any geographic limitation which you claim was applicable to each licensee (Yes or No)?

If Yes state the geographical areas for which each licensee was permitted to sell, manufacture or distribute this Defendant's asbestos-containing products; and

D. Describe the terms and conditions of each licensee agreement entered into between this Defendant and licensee insofar as manufacture, sale, and distribution of asbestos-containing products;

E. List of products each licensee was permitted to sell or manufacture;

F. Identify all documents pertaining to the licensee relationship and the custodian thereof;

G. Whether or not sales to consumers in each area were made exclusively through licensee.

Answer:

Objection. This interrogatory is ambiguous, overbroad, harassing, over burdensome and unintelligible in the use of the word "licensees."

12. **Asbestos/Facilities**

For the period 1920 to date, or during the period that Defendant mined, manufactured, sold or distributed asbestos containing products, whichever period is less, state the following regarding each facility that was used by you as a mining, milling, manufacturing, processing, distribution or marketing facility for asbestos containing products:

A. The name and address of the building, mine, mill or facility;

B. The inclusive dates the facility was in operation; and,

C. The function of the facility (e.g., manufacturing, warehousing, mine, sales office, etc.)

D. Plant managers and years of management;

E. Name and type of asbestos-containing products manufactured or processed at each facility;

F. Identify shipment records for each facility and the custodian thereof;

G. If asbestos was mined and sold to any other entity besides this Defendant, please provide list of those entities.

Answer:

Objection. This interrogatory is overbroad, harassing, burdensome and without reference to the facts alleged in the Complaint against Chrysler Corporation.

13. **Answering Defendant's Asbestos Containing Products**

Using the format set out below, answer the following interrogatory. The main purpose of this interrogatory is to first, obtain basic information concerning asbestos-related products, which generic product type has been previously identified in exposure sheets in this circuit with which the answering defendant and its associated business entities were involved, and second, to identify the number of "Interrogatory Response Sheets" the answering defendant must complete.

Provide the following information for each asbestos-containing product, which generic product type has been previously identified in exposure sheets in this circuit, with which this answering defendant was involved:

A. The name of the associated business entity so involved;

B. The Product Trade Name of the asbestos product(s) with which the entity was involved (See the definition of "Product Trade Name" at interrogatory number 14(B));

C. The Product Trade Name of the asbestos product(s) with which the entity was involved (See the definition of "Product Trade Name" at interrogatory number 14(B);

D. Identify the inclusive years of each type of product involvement (e.g., If the entity manufactured and distributed the product, list both types of involvement and the years that correspond to such involvement);

Use the following format. Please work through all of the asbestos-containing products with which one associated business entity was involved before working through all of the asbestos-containing products with which a different associated business entity was involved.

Answer:

Chrysler Corporation objects to the interrogatory as overbroad and burdensome. Upon information, Chrysler Corporation has never been required to serve answers to standard asbestos interrogatories in the Eleventh Judicial Circuit prior to this submission. The information sought requires Chrysler Corporation to conduct a complete product historical review of its records and files as pertains to a "generic" product list proffered by Plaintiff(s). This historical review poses great prejudice and significant burden to Chrysler Corporation, an atypical defendant party in Dade County asbestos litigation. Chrysler Corporation re-adopts the objections filed by Caterpillar, Inc.'s Motion to Strike or in the Alternative Objections to Plaintiffs' Master Preliminary Interrogatories and General Motors/Detroit Diesel's Motion to Strike Plaintiffs' Second Set of Interrogatories as pertains to be information sought by Plaintiff(s), herein.

FORMAT

(Repeat this format for each product with which each associated business entity was involved)

(a) Associated Business Entity	(b) Product Trade Name	(c) Type(s) of Involvement	(d) Years of Each Type of Involvement

EXAMPLE

(a) Associated Business Entity	(b) Product Trade Name	(c) Type(s) of Involvement	(d) Years of Each Type of Involvement
Company Q	*Product E	Manufacturer	1957-1973
		Distributor	1957-1973
		Labeler	1957-1973
		Rebrander	1960-1965

(a) Associated Business Entity	(b) Product Trade Name	(c) Type(s) of Involvement	(d) Years of Each Type of Involvement
Company Q	*Product F	Rebrandee	1953-1962
		Labelee	1957-1973

(a) Associated Business Entity	(b) Product Trade Name	(c) Type(s) of Involvement	(d) Years of Each Type of Involvement
Company R	*Product E	Rebrandee	1960-1965

* Note that if different entities are involved with the same asbestos-containing products the asbestos-containing product is to be addressed in the responses of each such business entity, including the answering defendant if applicable.

14. **Product Information**

Following this page is a proposed "Interrogatory Response Sheet" and definitions, examples and instructions dealing with the completion of this question.

For each and ever asbestos-containing product, which generic product type has been previously identified in exposure sheets in this circuit, with which you were involved, as previously identified in responding to the previous interrogatory, please answer the following.

A separate response is to be provided to this question for each and every asbestos-containing product with which the responding defendant was involved.

If different entities were involved with the same asbestos-containing products the asbestos-containing product is to be addressed in a response to this question for each such business entity, including the answering defendant if applicable.

*For example if pipe covering is a generic product type that has been previously identified in exposure sheets filed in this circuit, then the answering defendant is to provide information regarding all types of pipe covering manufactured, sold and/or distributed by defendant regardless of whether a specific types of pipe covering /manufactured, distributed and/or sold by defendant has been identified in exposure sheets in prior litigation in this circuit. In contrast if ironing board covers are a product that have not been identified in exposure sheets filed in this circuit then the defendant need not provide information regarding this product type.

Answer:

Chrysler Corporation objects to the interrogatory as overbroad and burdensome. Upon information, Chrysler Corporation has never been required to serve answers to standard asbestos interrogatories in the Eleventh Judicial Circuit prior to this submission. The information sought requires Chrysler Corporation to conduct a complete product historical review of its records and files as pertains to a "generic" product list proffered by Plaintiff(s). This historical review poses great prejudice and significant burden to Chrysler Corporation, an atypical defendant party in Dade County asbestos litigation. Chrysler Corporation re-adopts the objections filed by Caterpillar, Inc.'s Motion to Strike or in the Alternative Objections to Plaintiffs' Master Preliminary Interrogatories and General Motors/Detroit Diesel's Motion to Strike Plaintiffs' Second Set of Interrogatories as pertains to be information sought by Plaintiff(s), herein.

INTERROGATORY RESPONSE SHEET

A. Associated Business Entity _____

B. Product Trade Name _____

C. Product Generic Name _____

D. Generic Product Type _____

E. Product Involvement(s) _____

F. (1) Approximate Asbestos Content By Weight _____ to _____

Type of Asbestos by % _____

(2) Approximate Asbestos Content By Volume _____ to _____

Type of Asbestos by % _____

G. Product Years ____|____ ____|____ ____|____ ____|____

H. Intended Uses _____

I. Manufacturing Sites _____|_____

_____|_____

_____|_____

_____|_____

_____|_____

J. Sizes _____ to _____

K. Product Color(s) ____|____ ____|____ ____|____ ____|____

L. Product Packaging _____ _____ _____ _____

M. Geographic Limitation (Yes/No)? ___

If Yes, Shipments:

Shipments:

Northeast ___ MA ___ NH ___ ME ___ NY ___ VT ___ RI ___ CT

Mideast ___ OH ___ VA ___ WV ___ KY

Southeast ___ FL ___ NC ___ SC ___ TN ___ AL ___ GA ___ MS

Southwest ___ TX ___ CO ___ NM ___ UT ___ AR ___ AZ ___ LA ___ OK

Midwest ___ MI ___ IL ___ IN ___ MO ___ WI ___ MN ___ ND ___ SD ___ WY ___ NB ___ KA ___ IA

West ___ CA ___ NV ___ OR ___ ID ___ WA ___ MT ___ HI ___ AK

East ___ PA ___ DE ___ NJ ___ MD ___ DC

Other ___ VI ___ GU ___ PR

N. Product Literature _____

O. Product Picture(s) _____

P. Package Picture(s) _____

Q. Product Sample _____

R. Trademark Name(s) _____ _____

S. Patent Number(s) _____ _____

T. Product Alteration _____

A. **Associated Business Entity** _____

Definition:

The name of the business entity as identified in the previous Interrogatory that had any involvement (as defined in Subpart E) with the asbestos-containing product.

Example:

Associated Business Entity	The Ruberiod Co.
Associated Business Entity	Baldwin-Hill Company
Associated Business Entity	None

Instructions:

Complete this interrogatory with the name of an Associated Business Entity that corresponds to this product as disclosed in the previous Interrogatory. Where the answering defendant, rather than an Associated Business Entity, was involved with this asbestos-containing product, type "none" on this line.

B. **Product Trade Name** _____

Definition:

The full name of the asbestos-containing product by which it was marketed. Generally, this would be the name of the product as it appeared on the product, its packaging or its promotional material. Where all, or part of the product name is trademarked, the name should be included in the product trade name.

Instructions:

Where a product trade name represents more than one product, or a line of products, complete separate "interrogatory Response Sheets" for each such product to the extent reasonable and necessary so as to provide as much information as possible regarding each such product or product line. Where information concerning more than one product or a product line is condensed on one "Interrogatory Response Sheet," explain, on a separate sheet of paper why you did so.

Examples:

Product Trade Name BEH Super Powerhouse Cement
Product Trade Name Gold Bond Asbestone Economy 250
Product Trade Name K-Fac Insulation Blocks
Product Trade Name Armstrong Accobest AS-8073
Product Trade Name Armstrong Accobest AS-474

Further Instructions:

Where the product name is "generic," that is, it does not have a trade name by which it was sold, then list the product's generic name but preface the generic name with the name of the entity most closely associated with that generic. The entity most closely associated with that product would be the entity's name that would appear with the product, product package, or product promotional literature.

If no such association exists, then the name of the /manufacturer of that generic product should be used.

Further Examples:

Product Trade Name Ruberoid Asphalt Saturated Asbestos Weatherproof Jacket

Product Trade Name Amatex Asbestos Woven Tape
Product Trade Name Armstrong Perforated Asbestos Board
Product Trade Name Celotex Perforated Asbestos Board

C. **Product Generic Name** _____

Definition:

The name by which this type or species of product was routinely called. Generally, this name would be the generic name of a product (without the name of the entity most closely associated with that generic product).

Examples:

Product Trade Name Careystone Asbestos-Cement Siding
Product Generic Name Asbestos Cement Siding

Product Trade Name Gold Bond Asbestone Economy 250
Product Generic Name Corrugated Siding and Roofing

Product Trade Name K-Fac Insulation Block
Product Generic Name Insulation Block

Product Trade Name Armstrong Perforated Asbestos Board
Product Generic Name Perforated Asbestos Board

D. **Generic Product Type** _____

Definition:

Product Generic Name Insulating Cement
Product Category Cement

Product Generic Name Corrugated Siding and Roofing
Product Category Roofing/Siding

Product Generic Name Hi-temp Block
Product Category Block

Product Generic Name Perforated Asbestos Board
Product Category Board

Further Instructions:

To the extent reasonable, the following categories of products should be used. Where a product fits as readily in one category as another (e.g., corrugated siding and roofing), both categories can be listed as is shown above.

CATEGORIES				
Adhesives	Cement Sheets	Friction	Paper	Talc
Automotive Brake	Cement Shingles	Gaskets	Pipe Covering	Tape
Automotive Clutch	Cloth	Home Use	Plaster	Textiles
Block	Clothing	Hot tops	Refractory	Wallboard
Board	Cord	Lumber	Rollboard	Wall Covering
Boiler Cement	Cork Products	Millboard	Roofing	Wick
Cable	Electrical Products	Non Automotive Brake	Rope	Wire
Cement	Felts	Non Automotive Clutch	Siding	
Cement Board	Fiber	Packing	Spray Materials	
Cement Pipe	Floor Tile	Paint	Speckling	

If none of the above categories are appropriate, note "other" and use your own words to describe the category of product.

E. **Product Involvement(s)** _____

Definition:

Any involvement, association, or relationship you had with an asbestos-containing product as a miner of asbestos, manufacturer of an asbestos-containing product, seller of an asbestos-containing product, distributor of an asbestos-containing product, rebrander of an asbestos-containing product, rebrandee of an asbestos-containing product, labeler of an asbestos-containing product, labelee of an asbestos-containing product, or some other relationship.

Further Definitions:

A miner of an asbestos-containing product is any entity that takes asbestos from the earth for commercial sale or distribution.

A manufacturer of an asbestos-containing product is any entity that manufactures any product that incorporate asbestos into that product, or who in any way processes or packages asbestos or an asbestos-containing product.

A distributor of an asbestos-containing product is any entity who ships or in any way directs shipments of an asbestos-containing product.

A rebrander of an asbestos-containing product is any entity that manufacturers process, or packages asbestos or an asbestos-containing product but which places the name of another entity or the name of a product with which another entity is involved on that product or product package.

A rebrandee of an asbestos-containing product is any entity for which asbestos or an asbestos-containing product is manufactured, processed, or packaged by another entity, which other entity places the name of the rebrandee or the name of a product with which the rebrandee is involved on the product or product package.

A labeler of asbestos or an asbestos-containing product is any entity that places its business name anywhere on an asbestos-containing product or package that it manufactures, distributes, sells or rebrands for itself or any entity.

A labelee of asbestos or an asbestos-containing product is any entity for who its business name is placed anywhere on an asbestos-containing product or package that is manufactured, sold, or rebranded by any entity.

Some other association or relationship with an asbestos-containing product other than as a miner, manufacturer, distributor, rebrander, rebrandee, labeler or labelee.

Instructions:

For each asbestos-containing product with which you were in any way involved, indicate the type or types of relationships you had at any time with that product, noting on line E the code or codes for such relationship. These involvements should be the same as were listed in the previous interrogatory.

Use the following codes:

Miner (Mr)	Rebrander (Rr)	Labeler (Lr)	Distributor (Dr)
Manufacturer (Mf)	Rebrandee (Re)	Labelee (Le)	Other (To)

Examples:

Product Involvements Mf Rf Lr Dr
Product Involvements Dr

Some other association or relationship with an asbestos-containing product other than as a miner, manufacturer, distributor, rebrander, rebrandee, labeler or labelee.

Instructions:

For each asbestos-containing product with which you were in any way involved, indicate the type or types of relationships you had at any time with that product, noting on line E the code or codes for such relationship. These involvements should be the same as were listed in the previous interrogatory.

Use the following codes:

Miner (Mr)	Rebrander (Rr)	Labeler (Lr)	Distributor (Dr)
Manufacturer (Mf)	Rebrandee (Re)	Labelee (Le)	Other (To)

Examples:

Product Involvements Mf Rf Lr Dr
Product Involvements Dr

F. (1) Approximate Asbestos Content by Weight _____ to _____

Type of Asbestos by % _____

Definition:

The usual weight of the asbestos in the product divided by the total weight of the product expressed as a percent. Additionally, provide a listing of all types of asbestos, including contaminants found in the product, as supplied to end users and for each type provide the percentage by weight of each type per unit of product.

Instructions:

Where the asbestos content has varied to any significant degree over time in a particular product, indicate the range of asbestos content in the appropriate section of the answer. If little change occurred over time, write "N/A" in those sections.

In the first part of the answer, whether or not the asbestos content varied, indicate what you believe would be the usual, most representative content over time. In the second part of the answer, note the range of asbestos content over time.

When stating the percent of asbestos by weight, exclude any water added as part of the formulation and in application of the product.

Use the following two letter codes when responding to this interrogatory:?

- Cv for crysotile
- Am for amosite
- Cr for crocidolite
- Tr for tremolite
- To for any other type of asbestos
- N/A for not applicable

Example:

Approximate Asbestos Content by weight 10% | N/A to N/A
Approximate Asbestos Content by weight 10% | 3% to 12%

Type of Asbestos by % Cv - 10%, Tr - 1%

(2) Appropriate Asbestos Content by Volume ____|____ to _____

Type of Asbestos by % _____

Definition:

The usual volume of the asbestos in the product divided by the total volume of

the product expressed as a percent. Additionally, provide a listing of all types of asbestos, including contaminants found in the product as supplied to end users and for each type provide the percentage by volume of each type per unit of product.

G. **Product Years** _____ _____ _____ _____

Definition:

Inclusive dates of all types of involvement with the asbestos-containing product, expressed in years.

Instructions:

Indicate in the first half of the space, the year you, or the relevant associated business entity first became involved with the asbestos-containing product. On the second half of the space, indicate the last year of involvement with that asbestos-containing product.

If the involvement with the asbestos-containing product was not continuous through all years, use the additional spaces provided to represent such years of involvement.

If the involvement with an asbestos-containing product lasted for only one year or part of one year, note the same year in both halves of the space. If the involvement continues to this time, note "P" for present in the appropriate space.

Type: N/A | N/A (not applicable) on any unused spaces.

Example:

Product Years	1948 | 1972	1975 | 1975	N/A | N/A	N/A | N/A	
Product Years	1936 | 1953	1955 | 1963	1966 | 1970	1972| P	

H. **Intended Uses** _____

Definition:

Provide any limitations on the intended use of the product, including the temperature ranges for which the product was recommended.

H. **Intended Uses** _____

Definition:

Provide any limitations on the intended use of the product, including the temperature ranges for which the product was recommended.

1. Manufacturing Sites: _____ _____

_____ _____

Definition:

All locations and time periods at and during which the product was manufactured during your involvement with the product.

Instructions:

On the first half of the line indicate the city and state, or city and province or the like, at which the product was manufactured.

On the second half of the line, indicate the inclusive years of manufacture.

Example:

Manufacturing Sites	Norfolk, VA | 1940-1970
Manufacturing Sites	Milwaukee, WI | 1962-1969 Peoria, IL | 1967-1973
Manufacturing Sites	Glendale, IL | 1967-1970 Glendale, IL | 1972 1976
Manufacturing Sites	Conrad, UT | 1936-1942 Ida, IL | 1942-1950 Ida, IL | 1952-1969

J. **Sizes** _____ to _____

Definition:

The generally produced sizes and shapes of the product as sold to the end user, noting the smallest to the largest standard sizes. Respond additionally to this interrogatory by providing information as to the packaging of the product when providing information regarding the product's size. (e.g. 25-75 lb. bags of cement, etc.)

Instructions:

In completing this information, note the smallest standard sizes or weights first, then the largest standard sizes or weights.

Use the following abbreviations as appropriate.

- "C" for circumference
- "D" for diameter
- "G" for gauge
- "H" for height
- "L" for length
- "P" for pounds
- "T" for thickness
- "W" for width

If the suggested abbreviations are inappropriate, type out the most useful size or weight description on the spaces provided or on a separate sheet of paper, identifying that entry as "Interrogatory Response (14)(J), Sizes" and attach that sheet to the Interrogatory Response Sheet.

Examples:

Sizes D2", L12", T1/2" to D24", L48", T2"
Sizes 10 P sacks to 100 P sacks

K. **Product Color(s)** ___|___ ___|___ ___|___ ___|___

Definition:

The basic color(s) of the product. Where the product line had the same basic product in a variety of colors, the five most popular colors or color combinations.

Instructions:

A piece of product may be single-colored or multi-colored. Different pieces of the same product may be designed to show different colors (e.g., floor tile) or the color may have changed from time to time. The above lines are to be completed as follows:

- If the product was the one color, complete the first half of the first line only. Note: "N/A" on the second half of the lines, and N/A | N/A on all other lines.

- If the product was one color, but that color changed from time to time, complete the first half of as many lines as there were color changes (up to five). Note: "N/A" on the second half of the lines, and N/A | N/A on all other lines.

- If the product line included multi-colored pieces indicate the two most prominent colors by using both sides of the line. Up to five multi-colored products can be noted.

- If there were more than five colors or five color combinations, note the most frequently made color(s).

- Try to limit your responses by using the following colors. Use the two-letter codes provided. Generally, do not separately identify shades of the same color. If the following colors are inadequate to describe a product color, type in what you believe is the proper color name(s).

- Gray (Gy)	- Blue (Bl)	- Brown (Br)
- Black (Bk)	- Violet (Vt)	- Yellow (Yw)
- White (Wh)	- Green (Gr)	- Orange (Or)
- Red (Rd)	- Pink (Pk)	- Tan (Tn)

Example:

Product Color(s)	Gy|N/A Bk|N/A Wh|N/A N/A|N/A N/A|N/A
Product Color(s)	Gy|Bk Bk|N/A N/A|N/A N/A|N/A N/A|N/A
Product Color(s)	Wh|Rd Wh|Bk Wh|Bl Wh|Yw Wh|Or

L. **Product Packaging** _____

Definition:

The most frequently used containers in which the product was packaged.

Instructions:

To the extent possible, use the following codes as set forth below in responding to this interrogatory. Where no code is applicable, type the kind of container or packaging. Provide up to five types of containers, listing where known, the most frequently used container first, second most frequently used container, next, etc. Type N/A on any unused line.

Cardboard box (CB)	Metal drum (MD)	Burlap sack (BS)
Wooden box (WB)	Cardboard drum (CD)	Cloth sack (CS)
Plastic box (PB)	Plastic drum (PD)	Paper sack (PS)
Other box (OB)	Other drum (OD)	Plastic sack (KS)
Bound bundles (BB)	Pallets (PT)	Other sack (OS)
Wooden spools (WL)	Paper spools (PL)	Plastic spools (PL)
Other spools (OL)		

Example:

Product Packaging	CB	WB	N/A	N/A	N/A	
Product Packaging	CD	N/A	N/A	N/A	N/A	
Product Packaging	CS	KS	PS	OS	N/A	N/A

M. Within the United States was there any geographic limitation which you claim was applicable to the sale of this product (Yes or No)?

Geographic Limitation (Yes/No)? _____

If Yes, state the geographical area which you claim was applicable to this product.

Shipments:

Northeast	___ MA	___ NH	___ ME	___ NY	___ VT	___ RI	___ CT					
Mideast	___ OH	___ VA	___ WV	___ KY								
Southeast	___ FL	___ NC	___ SC	___ TN	___ AL	___ GA	___ MS					
Southwest	___ TX	___ CO	___ NM	___ UT	___ AR	___ AZ	___ LA	___ OK				
Midwest	___ MI	___ IL	___ IN	___ MO	___ WI	___ MN	___ ND	___ SD	___ WY	___ NB	___ KA	___ IA
West	___ CA	___ NV	___ OR	___ ID	___ WA	___ MT	___ HI	___ AK				
East	___ PA	___ DE	___ NJ	___ MD	___ DC							
Other	___ VI	___ GU	___ PR									

Definition:

Identify those states, possessions, etc. to which your product was ever shipped, was never shipped or it is unknown to you as to whether your product was ever shipped there, if you claim a geographical limitation.

Instructions:

Identify those areas to which you know any product was ever shipped by marking an X on the appropriate line for that state, territory, etc.

Identify those areas to which you know any product was never shipped by marking an O on the appropriate line for that state, territory, etc.

Identify those areas about which you have no information as to whether any product was ever shipped by marking a "?" on the appropriate line for that state, territory, etc.

"Other" means any geographical area not identified by the prior abbreviations.

Example:

Shipments:

Northeast	X	X	X	X	X	X	X					
	MA	NH	ME	NY	VT	RI	CT					
Mideast	X	X	X	X								
	OH	VA	WV	KY								
Southeast	X	X	X	X	X	X	X					
	FL	NC	SC	TN	AL	GA	MS					
Southwest	X	X	X	X	X	X	?	X				
	TX	CO	NM	UT	AR	AZ	LA	OK				
Midwest	O	O	O	O	?	?	?	?	O	O	O	O
	MI	IL	IN	MO	WI	MN	ND	SD	WY	NB	KA	A
West	O	O	O	O	O	O	?	?				
	CA	NV	OR	ID	WA	MT	HI	AK				
East	X	X	X	X	?							
	PA	DE	NJ	MD	DC							
Other	O	O	O	X								
	VI	GU	PR	OTHER								

N. **Product Literature** _____

Definition:

Whether or not you have any product literature of any sort (e.g., promotional literature, ads, catalogue entries, books, etc.) that describes or pictures this product, yes or no.

Examples:

Product Literature Yes

Product Literature No

O. **Product Picture(s)** _____

Definition:

Whether or not you have care, custody or control over any depictions of this product, and if so, the type of depiction(s).

Instructions:

If you have no depictions of this product, answer "no" in the space provided.

If you do have depictions of this product, indicate the types of depictions you have. Use the following codes and indicate for each type of depiction whether it is a:

- Color Picture (CP)
- Color Sketch (CS)
- Black & White Sketch (BS)
- Blueprint (BT)
- Black & White Picture (BW)
- Photocopy (PC)
- Other (TO)

Examples:

Product Picture(s) No

Product Picture(s) BT

Product Picture(s) CP BT BW PC TO

P. **Package Picture(s)** _____

Definition:

Whether or not you have any depictions of the product packaging and if so, the type of depictions.

Instructions:

If you have no depictions of this product, answer "no" in the space provided.

If you do have depictions of this product, indicate the types of depictions you have. Use the following codes and indicate for each type of depiction whether it is a:

- Color Picture (CP)
- Color Sketch (CS)
- Black & White Sketch (BS)
- Blueprint (BT)
- Black & White Picture (BW)
- Photocopy (PC)
- Other (TO)

Examples:

Product Picture(s) No

Product Picture(s) BT

Product Picture(s) CP BT BW PC TO

Q. **Product Sample** _____

Definition:

Whether or not you have one or more samples of the asbestos-containing products, yes or no.

Example:

Product Sample Yes
Product Sample No

R. **Trademark Name(s)** _____ _____

Definition:

The name of any trademark(s) in any way associated with the product, product packaging, or product literature.

Instructions:

If more than one Trademark is associated with the name of a product (e.g., Gold Bond Ripple-Tone Panels), provide the requested information for each trademark.

Type N/A on any unused lines.

Examples:

Trademark Name(s) Perf-A-Tape N/A

Trademark Name(s) Gold Bond Ripple Tone

S. **Patent Number(s)** _____ _____

Definition:

The Patent Number(s) of any product or process in any way related to the product itself.

Instructions:

To the extent more than one patent is involved with the product itself, or the manufacture, sale, processing, development, etc. of the product, note the additional patent number on the additional line provided.

Type N/A on any unused lines.

Examples:

Patent Number(s) 3.660.148 N/A

Patent Number(s) 2.573.659 2.529.175

T. **Product Alteration** _____

Definition:

State whether the product has been altered in chemical composition since first being made. If so, please state as to each such alteration:

i. The date of the alteration;

ii. The nature of the alteration;

iii. The reason for the alteration;

iv. Identify the person(s) recommending or approving such alteration; and

v. Whether there are any studies, evaluations or tests made in connection with the alteration, and if so, identify each such study.

15. **Asbestos Free Products**

For each asbestos containing product whose trade name is listed in Answer No. 14, state:

A. Was the product, or a substitute for that product, ever manufactured and/or sold by you without asbestos; if so, when did the sale of the product commence;

B. Brand name of the asbestos free product;

C. The reason product was manufactured without asbestos;

D. Was the asbestos-containing counterpart of said product sold while the asbestos-free counterpart was being manufactured; if so, provide the time periods;

Answer:

Chrysler Corporation objects to the interrogatory as overbroad and burdensome. Upon information, Chrysler Corporation has never been required to serve answers to standard asbestos interrogatories in the Eleventh Judicial Circuit prior to this submission. The information sought requires Chrysler Corporation to conduct a complete product historical review of its records and files as pertains to a "generic" product list proffered by Plaintiff(s). This historical review poses great prejudice and significant burden to Chrysler Corporation, an atypical defendant party in Dade County asbestos litigation. Chrysler Corporation re-adopts the objections filed by Caterpillar, Inc.'s Motion to Strike or in the Alternative Objections to Plaintiffs' Master Preliminary Interrogatories and General Motors/Detroit Diesel's Motion to Strike Plaintiffs' Second Set of Interrogatories as pertains to be information sought by Plaintiff(s), herein.

16. **Product Development/Design**

For each asbestos product referred to in Answer No. 14, or which was sold to any other defendant, state separately:

A. Was the product manufactured or sold to any entity prior to its being placed on the commercial market;

B. The date and place where the product was designed and developed;

C. The identity and last known address of the person or persons responsible for the design or development of the product;

D. Was she product ever tested prior to its being sold for use by the consumer? If so, provide the identity and present location of all records dealing with these tests (including testing concerning use, application, durability, toxicity, etc.) and the custodian of said records.

Answer:

Chrysler Corporation objects to the interrogatory as overbroad and burdensome. Upon information, Chrysler Corporation has never been required to serve answers to standard asbestos interrogatories in the Eleventh Judicial Circuit prior to this submission. The information sought requires Chrysler Corporation to conduct a complete product historical review of its records and files as pertains to a "generic" product list proffered by Plaintiff(s). This historical review poses great prejudice and significant burden to Chrysler Corporation, an atypical defendant party in Dade County asbestos litigation. Chrysler Corporation re-adopts the objections filed by Caterpillar, Inc.'s Motion to Strike or in the Alternative Objections to Plaintiffs' Master Preliminary Interrogatories and General Motors/Detroit Diesel's Motion to Strike Plaintiffs' Second Set of Interrogatories as pertains to be information sought by Plaintiff(s), herein.

17. **Sales Documents**

Please state whether you have any documents of any kind indicating or reflecting past sales of one or more asbestos-containing products listed in response to interrogatory 14, including, but not limited to, invoices, orders, purchase records, sales records, confirmations, bills of lading, annual or other periodic summaries of sales or orders, accounts payable or accounts receivable records, etc. If so, describe in detail the different types of documents that you have for each such asbestos-containing product, and state the following as to each type of document:

A. The items of information contained on it (e.g., date of sale, product, quantity, purchaser, shipment location, price, etc.);

B. The years of sale encompassed by documents still in existence;

C. The current location of the documents;

D. Identify the current custodian of the documents, as well as the current employee most familiar with the codes or system used on the documents.

Answer:

Chrysler Corporation objects to the interrogatory as overbroad and burdensome. Upon information, Chrysler Corporation has never been required to serve answers to standard asbestos interrogatories in the Eleventh Judicial Circuit prior to this submission. The information sought requires Chrysler Corporation to conduct a complete product historical review of its records and files as pertains to a "generic" product list proffered by Plaintiff(s). This historical review poses great prejudice and significant burden to Chrysler Corporation, an atypical defendant party in Dade County asbestos litigation. Chrysler Corporation re-adopts the objections filed by Caterpillar, Inc.'s Motion to Strike or in the Alternative Objections to Plaintiffs' Master Preliminary Interrogatories and General Motors/Detroit Diesel's Motion to Strike Plaintiffs' Second Set of Interrogatories as pertains to be information sought by Plaintiff(s), herein.

18. **Sales Office**

Did you ever have any sales offices in Florida that were responsible for distribution and/or sales of asbestos and/or asbestos containing products listed in responding to interrogatory 14? If so, please state as to each such sales office;

A. Its address and years of operation;

B. Identify all managers from 1930 through the present and the years during which they were served;

Answer:

Objection. This interrogatory is overbroad without reference to the allegations against Chrysler Corporation. Without waiving said objections, Chrysler Corporation has submitted to the personal jurisdiction of this Court with regard to this litigation.

19. **Fiber Purchases**

Please state the name and address of each business entity from whom the Defendant, Defendant's predecessors, Defendant's subsidiaries have ever bought or received raw asbestos fiber.

Answer:

Chrysler did not design and/or develop all brake linings that it sold from 1959 to 1988. In addition to manufacturing brake linings, Chrysler purchased brake linings from other manufacturers. Subject to and without waiving the foregoing objections, Chrysler manufactured brake linings starting 1959. Chrysler also purchased brake linings from the following manufacturers during the years indicated:

1958 - 1961	Johns-Manville ABEX
1962	Bendix (Allied Signal Corp.) Johns-Manville
1963-1964	Bendix (Allied Signal Corp.)
1965-1968	Johns-Manville ABEX Bendix (Allied Signal Corp.)

20. **Insurance**

For all policies of insurance affording general liability or product liability coverage, including primary policies, excess policies, policies of reinsurance, program of self-insured retention (SIR) and/or policies in which defendant was additionally insured, applicable to injuries allegedly caused by exposure to asbestos and/or asbestos containing products state:

A.	Insurer:	Specify exactly as named in the insurance policy or other evidentiary document coverage.
B.	Insured:	The insured named in the policy.
C.	Policy Period:	Refer to the actual period for which the insurance policy is and/or was in effect.
D.	Policy Type:	Specify whether primary, excess or self-insured, etc.
E.	Per Occurrence/ Accident Limits:	Refer to the limit for any one occurrence or any one accident.
F.	Products Aggregate:	Refer to the aggregate limit applicable to products bodily injury liability coverage. Certain insurance policies may contain combined aggregate for bodily injury, property damage and other covered perils; if so, refer to the combined limit and so indicate.
G.	Products Aggregate Consumption:	The function of the Aggregate Consumption Summary is to track the consumption of total products liability aggregate limits claims. List such consumption. If applicable the date upon which the policy limits were paid out in full or exhausted.
H.	Policy Number:	Specify exactly as contained on the insurance policy or other evidential document of coverage the policy number. Additionally provide the custodian of the policy and/or document.
I.	Insurer Objection:	Specify the bases upon which the relevant insurer refuses to fully pay claims upon demand. If the insurer has not objected to payment or is paying, note N/A.

Answer:

Objection. The Interrogatory is overbroad and without reference to facts set forth in Plaintiff's Complaint. Without waiving its objection, Chrysler Corporation is presently self-insured and has been for years. These may however be certain concurrent coverage with Hartford Insurance Company. Chrysler has been self-insured by the Hartford Insurance Company from 1926 until 1971. There were separate policies each year. From 1972 to the present, Chrysler is largely self-insured.

21. **Asbestos Consultant**

Has any person ever served as a consultant (excluding experts retained during the time of litigation), full or part-time, to defendant in any manner regarding the potential medical, toxicological, or industrial hygiene aspects of asbestos or any asbestos containing product? (the term consultant is meant to include any specialist in the above areas who was at least in part retained for his expertise and opinions in other than a full-time salaried position). If so, please state the following as to each such person;

A. Identify the person;

B. The beginning date, ending date, and period of service for the person;

C. The job duties and/or responsibilities for the person, as well as a summary of the work performed;

D. The plant address, office address, or duty assignment location for the person for each part of the consultancy;

E. The reason for retaining the person;

F. Identify the company official responsible for retaining the person, as well as identify the company officials with whom the person met during the period of the employment of consultancy; and,

G. State whether the documents relating to the employment or consultancy in any way, including contracts, correspondence, publications, reports, status reports, studies, etc., exist and whether or not said documents mention asbestos. Additionally if said documents exist provide the name of the records custodian of said documents.

Answer:

Objection. This Interrogatory is overbroad, burdensome and without reference to the facts set forth in Plaintiff's Complaint. Without waiving its objection, Chrysler states as follows: Chrysler has retained an industrial hygienist since the mid 1930's. The industrial hygienist was hired since Chrysler felt it was necessary to establish an industrial hygiene department. The industrial hygiene department is located in Highland Park. Presently the industrial hygiene department reports to the manager of occupational safety, health and worker's compensation.

22. **Physician/Consultant**

Please state whether or not Defendant ever employed, engaged or retaining any physician as a consultant, plant physician or otherwise (excluding experts retained during the course of litigation), in connection with asbestos-related business activities. If so, please state the following as to each such physician.

A. Identify the physician and give complete dates and places of employment or service;

B. State the physician's duties and responsibilities;

C. Identify the company person to whom the physician reported;

D. State the purpose for which the physician was employed, engaged or retained; and ,

E. State whether documents pertaining to the physician's professional activities involving asbestos and/or individuals exposed to asbestos exist and the custodian of said documents.

Answer:

Objection. This Interrogatory is overbroad, vague and without reference to the facts set forth in Plaintiff's Complaint. The term "physician as a consultant" is not defined.

23. **Safety Consultant**

Please state whether or not any industrial hygienist, toxicologist, safety director, occupational medical director, physician or consultant in any of the foregoing areas previously identified (excluding experts retained during the course of litigation), ever made at any time any statements, recommendations and/or suggestions to the Defendant pertaining to or relating to asbestos or health hazards from dust or any product. If so, state the following as to each such occasion;

A. Identify who made the recommendation and/or suggestion;

B. State the date of the recommendation and/or suggestion;

C. Identify all company officials who receive the recommendation and/or suggestion;

D. State the substance of the recommendation and/or suggestion; and,

E. State whether any documents and/or records of oral conversations embodying or pertaining to the recommendation and/or suggestion exist and if so the custodian of said records.

Answer:

Objection. This Interrogatory is overbroad, vague and without reference to the facts set forth in Plaintiff's Complaint. The term "physician as a consultant" is not defined.

24. **Tests/Asbestos**

Please state whether Defendant ever conducted or caused to be conducted any tests (whether laboratory or field tests) on any of their or anyone else's asbestos-containing products, including measurements of exposure levels during installation, removal and/or after installation after they had degenerated or decomposed from use, to determine potential or likely asbestos exposure levels during conditions of intended use of the product. If so, please state the following as to each such test;

A. Identify the person who directed that the test and/or measurement be made and/or conducted;

B. Identify the person or organization who conducted the test and/or measurement;

C. Identify where, when and for how long the test and/or measurement was conducted, including the department of the plant or facility involved, as well as its owner and operator;

D. State the product(s) tested and describe the conditions of the test, including the measurement methodology;

E. Describe whatever efforts, if any, were used in the test to simulate the various conditions of possible or probable use of the product, such as in confined spaces or tunnels;

F. State the asbestos exposure levels measured including the ranges measured, median measurement and average measurement;

G. Identify to whom the test results were reported; and,

H. Identify all documents pertaining to the test and the custodian thereof.

Answer:

Objection. This Interrogatory is vague, ambiguous and overbroad. Notwithstanding this objection based on available corporate records, Chrysler Corporation has not done direct testing.

25. **Financial Support/Measurement/Tests**

Has Defendant ever conducted, caused to be conducted or financially supported through at least a 10% contribution toward s the total cost, any asbestos-related epidemoiolic, toxicologic, animal, medical, scientific tests, reviews, investigations, analysis, research or studies of any king (hereinafter termed "studies")? If so, please state as to each such study:

A. Identify who directed or authorized that the study be done;

B. Identify the person or organization that conducted the study;

C. State the dates and over what time period the study was done;

D. Describe the study design and protocol;

E. State the complete results of the study, including any conclusions or recommendations contained therein;

F. Identify all company officials who received notice of the existence of the study and/or its results;

G. Identify all documents relating to the study and the custodian thereof; and

H. State whether the study was ever published, and if so, state the study title and citation.

Answer:

See Answer to Interrogatory Number 24.

26. **Literature Review**

Has Defendant ever conducted, caused to be conducted, or financed through at least a 10% contribution towards the total cost, any effort to monitor or review the professional literature regarding the clinical, epidemiologic, toxicologic, industrial hygiene, medical and/or scientific aspects of asbestos and/or products containing asbestos (excluding for the purposes of litigation)? If so, please state the following as to each effort:

A. Identify who directed or authorized that the effort be done;

B. Identify the person or organization that conducted the effort;

C. State the dates and over what time period the effort was done;

D. Describe the effort design and protocol;

E. State the complete results of the effort, including any conclusions or recommendations contained therein;

F. Identify all company officials who received notice of the existence of the effort and/or its results;

G. Identify all documents relating to the effort and the custodian thereof; and,

H. State whether the effort was ever published, and if so, state the effort title and citation.

Answer:

Objection. Objection to this Interrogatory on the ground that it is vague, irrelevant, overbroad not properly limited as to time. Subject to and without waiving the foregoing objection, Chrysler Corporation states that it has not undertaken or financed such studies.

27. **Specific Studies/Participation**

Did Defendant at any time in any way participate in any of Metropolitan Life Insurance Company's studies of asbestos (conducted approximately between 1929-1940), any Trudeau Foundation/Saranac Lake studies (between 1929-1960), or any Industrial Hygiene Foundation studies (between 1938-1968)? If so, identify each such study in which you were involved and state as to each:

A. What role or action you took in regard to the study;

B. Identify all documents related to your involvement in the study and the custodian thereof;

C. Identify each of your facilities in which any part of the study was conducted and reference your facility to the data reported in the study; and,

D. Identify each of your officers, supervisors, managers or employees who assisted, participated in or directed your involvement in the study.

Answer:

See Answer to Interrogatory Number 26.

28. **Asbestos Hazard/Notice**

Did Defendant at any time prior to 1980 receive, have notice of, acquire or possess any advice, publication, statement, warning, order, directive, letter, memorandum, recommendation or document, written or oral, in any way related to asbestos and health hazards, or which implicitly or explicitly refers to asbestos and health issues. If so, state the following as to each such document and oral conversation, and each such occasion prior to 1980:

A. When any of this knowledge was first acquired, how it was acquired, identify by whom it was acquired, and state the substance of the knowledge acquired.

B. Identify all documents pertaining to the advice, publication, statement, warning, order, directive, letter, memorandum, or recommendation and the custodian thereof;

C. Identify all company officials and directors who received notice of the existence of the document or oral conversation. For each such oral conversation state the approximate date of said conversation and the parties to said conversation; and,

D. What action, if any, was taken by you as a consequence of the document or oral conversation.

Answer:

Objection. Chrysler Corporation objects to this Interrogatory as overbroad, burdensome and calls for a scientific and/or medical conclusion that Chrysler is not available to provide. This interrogatory improperly assumes that there is or might be adverse health effects associated with the use of chrysotile asbestos. Consequentially, answering Defendant cannot respond to the interrogatory in its present form. Additionally, the interrogatory is designed to elicit a response that maybe used in a misleading manner at the time of trial rather than the discovery factual information. Chrysler does not acknowledge a causal relationship between exposure to brake dust or clutch facing dust and any diseased illness. Chrysler was, however, aware in the 1930's that certain types of raw asbestos could cause pulmonary disease when inhaled in large quantities. Notably, chrysotile asbestos used in friction products is a different type of asbestos than the types involved in insulation products.

29. **Knowledge/Asbestosis**

Please state whether Defendant obtained, prior to 1980, any knowledge concerning the association, if any, between the inhalation of asbestos fibers and a lung disease known as asbestosis, in users, consumers and/or persons exposed to asbestos and/or asbestos containing products. If so, please state:

A. When any of this knowledge was first acquired, how it was acquired, identify by whom it was acquired, and state the substance of the knowledge acquired;

B. As to each such occasion thereafter in which your knowledge as to asbestosis increased either relative to the types of exposures (i.e. trades and occupations, etc.) and/or types of products which became associated with the development of asbestosis state:

(1) when was this additional knowledge acquired;

(2) how was this additional knowledge acquired;

(3) identify by whom it was acquired;

(4) state the substance of the additional knowledge acquired;

C. Identify all documents relevant to your acquisition of knowledge concerning the disease asbestosis and the custodian thereof; and,

D. If any of the foregoing knowledge was acquired through an oral conversation, identify each such oral conversation, the approximate date of said conversation and the parties to said conversation.

Answer:

See Answer to Interrogatory Number 28.

30. **Knowledge/Lung Cancer**

Please state whether Defendant, prior to 1980, ever obtained any knowledge concerning the association, if any, between the inhalation of asbestos fibers and lung cancer, in users, consumers and/or persons exposed to asbestos and/or asbestos containing products. If so, please state:

A. When any of this knowledge was first acquired, how it was acquired, identify by whom it was acquired, and state the substance of the knowledge acquired.

B. As to each such occasion thereafter in which your knowledge as to lung cancer increased either relative to the types of exposures (i.e. trades and occupations, etc.) and /or types of products which became associated with the development of lung cancer state:

(1) when was this additional knowledge acquired;

(2) how was this additional knowledge acquired;

(3) identify by whom it was acquired;

(4) state the substance of the additional knowledge acquired;

C. Identify all documents relevant to your acquisition of knowledge concerning lung cancer and the custodian thereof; and,

D. If any of the foregoing knowledge was acquired through an oral conversation, identify each such oral conversation, the approximate date of said conversation and the parties to said conversation.

Answer:

See Answer to Interrogatory Number 28.

31. **Knowledge/Mesothelioma**

Please state whether Defendant, prior to 1980, ever obtained any knowledge concerning the association, if any, between the inhalation of asbestos fibers and mesothelioma, in users, consumers and/or persons exposed to asbestos and/or asbestos containing products. If so, please state:

A. When any of this knowledge was first acquired, how it was acquired, identify by whom it was acquired, and state the substance of the knowledge acquired.

B. As to each such occasion thereafter in which your knowledge as to mesothelioma increased either relative to the types of exposures (i.e. trades and occupations, etc.) and/or types of products which became associated with the development of mesothelioma state:

(1) when was this additional knowledge acquired;

(2) how was this additional knowledge acquired;

(3) identify by whom it was acquired;

(4) state the substance of the additional knowledge acquired;

C. Identify all documents relevant to your acquisition of knowledge concerning mesothelioma and the custodian thereof; and,

D. If any of the foregoing knowledge was acquired through an oral conversation, identify each such oral conversation, the approximate date of said conversation and the parties to said conversation.

Answer:

See Answer to Interrogatory Number 28.

32. **Knowledge/Cancer of the Gastrointestinal Tract**

Please state whether Defendant ever obtained any knowledge concerning the association, if any, between the inhalation of asbestos fibers and cancer of the gastrointestinal tract (i.e. colon, stomach, etc.), in users, consumers and/or persons exposed to asbestos and/or asbestos containing products. If so, please state:

A. When any of this knowledge was first acquired, how it was acquired, identify by whom it was acquired, and state the substance of the knowledge acquired.

B. As to each such occasion thereafter in which your knowledge as to cancer of the gastrointestinal tract increased either relative to the types of exposures (i.e. trades and occupations, etc.) and/or types of products which became associated with the development of cancer of the gastrointestinal tract state:

(1) when was this additional knowledge acquired;

(2) how was this additional knowledge acquired;

(3) identify by whom it was acquired;

(4) state the substance of the additional knowledge acquired;

C. Identify all documents relevant to your acquisition of knowledge concerning cancer of the gastrointestinal tract and the custodian thereof; and,

D. If any of the foregoing knowledge was acquired through an oral conversation, identify each such oral conversation, the approximate date of said conversation and the parties to said conversation.

Answer:

See Answer to Interrogatory Number 28.

33. **Warning/Description**

Please provide the following information as to each caution, warning or hazard statement or explanation involving asbestos alleged to have been placed on the products or packaging or asbestos containing products by you?

A. What was its precise wording;

B. Where was it located on the product or packaging, and what was the size and color of the lettering;

C. Has the wording or its presentation ever been altered, and if so, how and when;

D. The years during which each version of a caution, warning or hazard statement appeared on each individual product identified in responding to interrogatory 14;

E. Identify all company officers and/or committees who participated in the decision to affix each version of the caution, warning or hazard statement to a product or its packaging, and in particular, identify the prime decision-maker, if any; and

F. Identify all documents related in any way to each caution, warning or hazard statement and the custodian thereof.

Answer:

Objection. This interrogatory is not specific as to a time period, it is irrelevant, overbroad and burdensome. Furthermore, Chrysler has sold motor vehicles with brakes and clutch parts allegedly installed in these automobile vehicles and are generally not shipped in packages with respect to after-market products. They are shipped in cardboard cartons of various sizes. These products may also have been distributed as components incorporated into motor vehicles of various sizes and descriptions. However, notwithstanding these objections, for purposes of discovery, the Chrysler service manual contained warnings (See attached 1973 and 1984 Service Manual regarding warnings). Warnings have been incorporated in Service Manuals consistently since 1984.

34. **Warning/Insert**

Has Defendant ever placed any form of package insert or informative brochure in a container of an asbestos-containing product, listed in response to interrogatory 14, explaining the hazards of asbestos? If so, state as to each such insert or brochure:

A. When was it first placed in containers and for what years thereafter?

B. What products had the insert or brochure included;

C. Describe the size, shape, color and text of the insert or brochure;

D. Identify all persons involved in the decision to include the insert or brochure; and

E. Identify all company officers and/or committees who participated in the decision to include an insert or brochure, and in particular, identify the prime decision-maker, if any; and

F. Identify the insert and/or brochure itself and the custodian thereof.

Answer:

See Answer to Interrogatory Number 33.

35. **Warning/Customer**

State whether you published and/or otherwise provided any of your distributors and/or customers with any instructions in regard to the asbestos hazards, if any, presented by use of Defendant's asbestos-containing products, other then inserts or labels (i.e. promotional pamphlets, product manuals, specification sheets, sales brochures, etc.) If so, please state:

A. When such instruction were first given;

B. By whom and when were these instructions made;

C. State the specific instructions provided; and

D. Identify all oral communications and documents related to these instructions. If oral identify the approximate date of said communication and the parties involved, if written provide the custodian of said documents.

Answer:

Objection. This Interrogatory is burdensome and overbroad. Without waiving this objection, the repair manuals were available from Chrysler Corporation with respect to repairs on Chrysler motor vehicles. Repair manuals have been in existence for decades. Notwithstanding this objection, warnings have been placed in the service repair manual continually since 1984 and have been on all new asbestos containing after market brake or clutch products since 1983. (See attached 1973 and 1984 Service Manual regarding Warnings).

36. **Warning/Mask**

Has Defendant ever placed any form of disposable face mask or respiratory in a container of an asbestos-containing product for later use by persons who would handle and/or be exposed to the product? If so, please state:

A. The products covered by the practice;

B. The year this practice began in the years it was implemented;

C. Describe the type of face mask or respirator included in the container; and

D. Identify all oral communications and documents related to this practice. If oral identify the approximate date of said communication and the parties involved, if written provide the custodian of said documents.

Answer:

Objection. This Interrogatory is vague, ambiguous and not likely to lead to the discovery of relevant evidence.

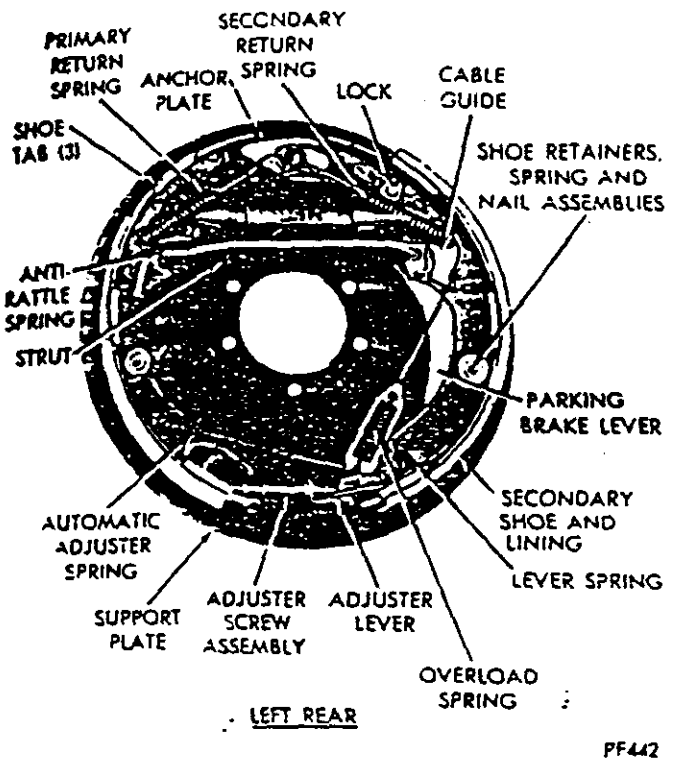

Fig. 5—Eleven Inch Brake Assembly—(Rear)

shoe contact across the entire width, extending from heel to toe. Shoes showing contact only on one side should be replaced. Shoes having sufficient lining but lack of contact at toe and heel should be measured for proper grind.

Clean the support, using a suitable solvent, then inspect for burrs. Remove if necessary. Clean and inspect the adjusting screws for pulled or stripped threads, then apply a thin film of lubricant to the threads, socket and washer (Fig. 9). Replace adjuster screw if corrosion of any part inhibits very free operation.

New brake shoe return springs and hold down springs should be installed where the old springs have been subjected to overheating or if their strength is questionable. Spring paint discoloration or distorted end coils would indicate an overheated spring.

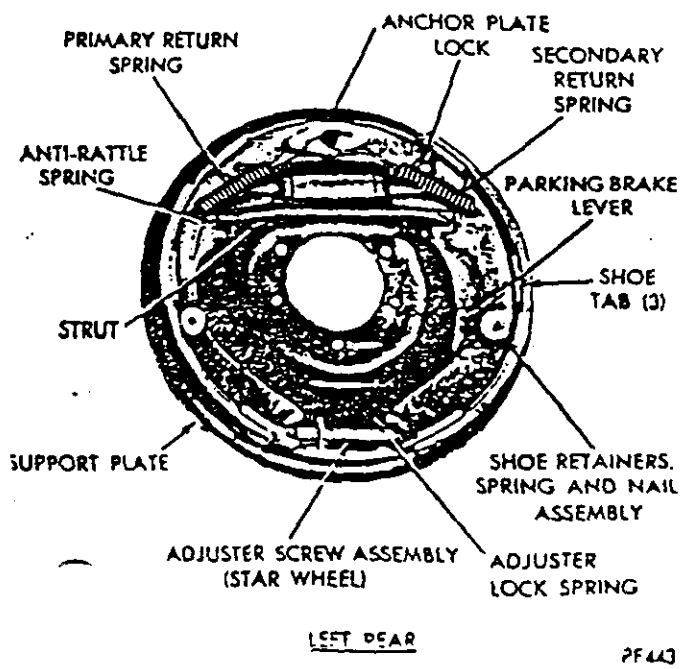

Fig. 6—Eleven Inch Brake Assembly—(Without Automatic Adjusters)—(Rear)

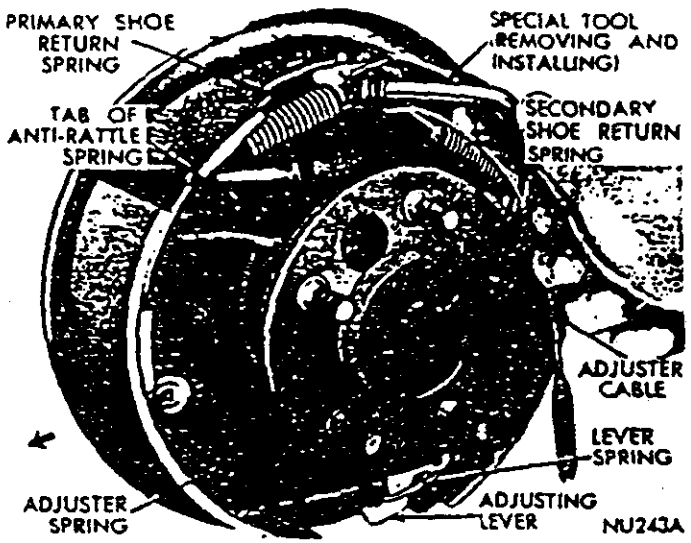

Fig. 7—Removing Shoe Return Springs—(Left Rear)

GRINDING AND REFACING RECOMMENDATIONS

Brake Shoe Lining—New lining should be measured and ground .060 in. to .080 in. (maximum under the drum diameter). When replacing brake shoe and lining assemblies, always check them in the drum

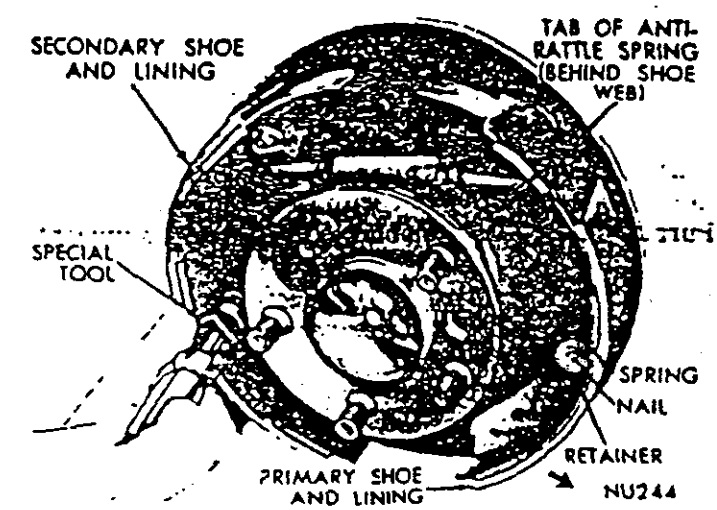

Fig. 8—Removing or Installing Shoe Retainers, Springs, and Nails—(Right Rear)

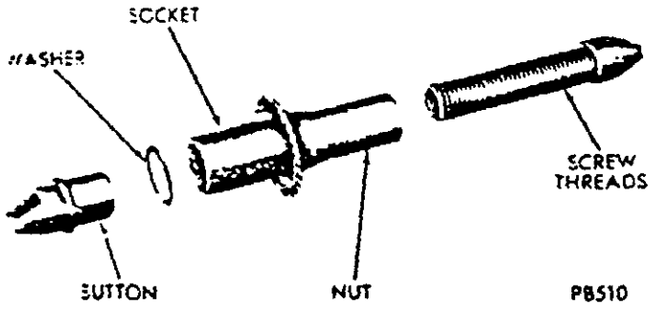

Fig. 9—Adjuster Screw Assembly

they are to be used with to insure that they have the recommended radius grind. This grind, which should provide at least .004 inch heel and toe clearance, is necessary for proper lining to drum contact during brake application.

CAUTION: When resurfacing or refacing brake shoes follow manufacturing recommendations for proper use of their equipment. **Whatever equipment is used, ensure that proper ventilation is provided to remove asbestos dust, which can be detrimental to health.**

Drum Refacing—Measure the drum runout and diameter with an accurate gauge. There should be no variation in the drum diameter greater than .002 inch. Drum runout should not exceed .006 inch out of round. If the drum runout or diameter variation exceed these values the drum should be refaced. Remove only as much material as is necessary to clean up the drum. It is recommended the front drums be refaced with the wheel and tire mounted. **Do not reface more than .060 inch over the standard drum diameter.**

NOTE: All drums will show markings of maximum allowable diameter (Fig. 10). For example, a nine inch drum will have a marking of MAX. DIA. 9.090". This marking includes .030" for allowable drum wear beyond the recommended .060" of drum refacing.

BRAKE SHOE INSTALLATION

Installing Front Brake Shoes

Lubricate with a thin film the shoe tab contact area (6 places) on support plate with Chrysler Parts Multi-Purpose Grease, Part number 2932524 or equivalent (Fig. 11).

(1) Match a primary with a secondary brake shoe and place them in their relative position on a work bench.

(2) Install adjusting star wheel assembly between primary and secondary shoes, with a star wheel next to secondary shoe (Fig. 1).

The left star wheel adjusting stud end is stamped "L" indicating its position on the vehicle and is also cadmium plated. The right star wheel is black, and the adjusting stud end is not stamped.

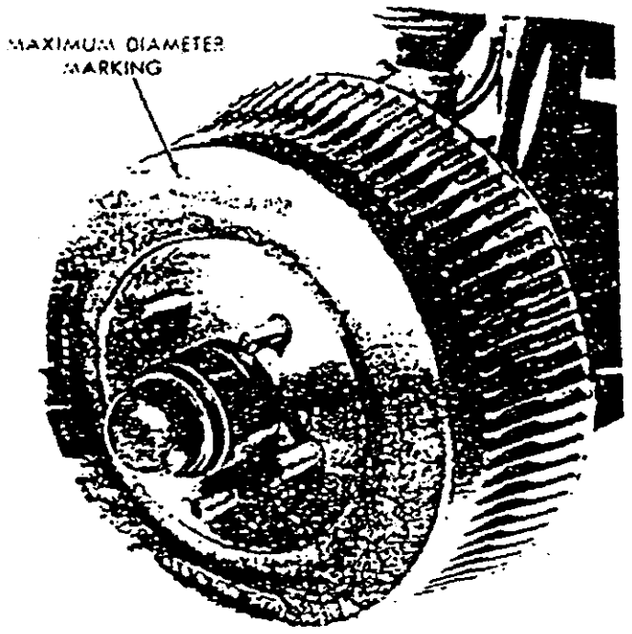

Fig. 10—Nine Inch Drum—Maximum Diameter Identification

(3) Install adjuster spring in primary shoe and hook other end in web of secondary. Install adjusting lever spring over pivot pin on shoe web. Install adjusting lever under spring and over pivot pin. Slide lever slightly rearward to lock in position (Fig. 1).

(4) Spread anchor ends of brake shoe to hold star adjusting wheel assembly in position.

(5) Holding brake shoes firmly, place assembly on support plate, and at the same time engage shoe webs with wheel cylinder pistons (Fig. 12).

(6) Using Tool C-4070, install shoe retaining nails, springs and retainers. (Fig. 6).

(7) Install anchor plate over anchor.

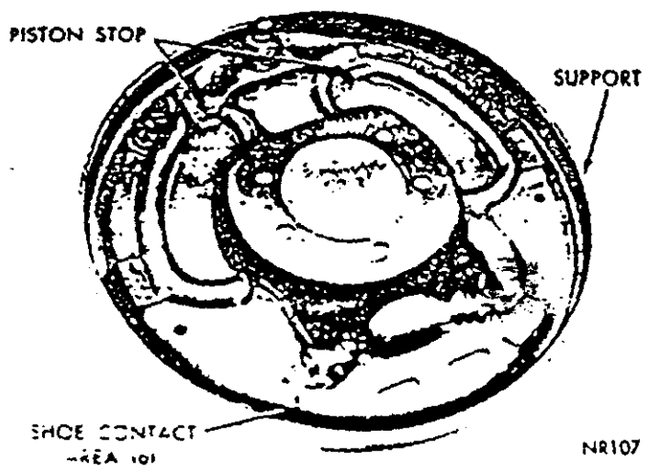

Fig. 11—Shoe Contact Area on Support

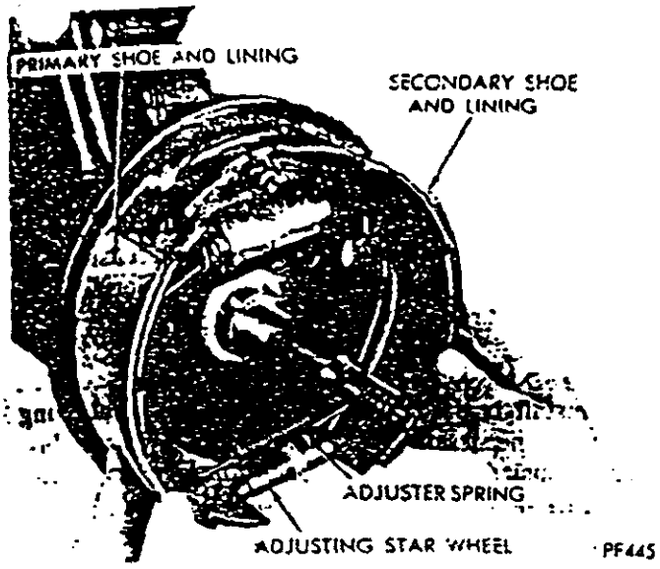

Fig. 12—Installing Brake Shoes—(Left Front)

(8) Slide "eye" of adjusting cable over anchor and against anchor plate. Engage end of primary shoe return spring in shoe web and install other end over anchor, using Tool C-3785.

(9) Install cable guide in secondary shoe web. Holding guide in position, engage secondary shoe return spr. through guide and into web. Install other end over anchor, using Tool C-3785. (Be sure cable guide remains flat against shoe web, and that secondary spring overlaps primary) (Fig. 1). Using pliers, squeeze ends of spring loops (around anchor) until parallel.

(10) Thread adjuster cable over guide and hook end of overload spring in lever (Fig. 1). (Be sure "eye" of cable is pulled tight against anchor and in a straight line with guide).

Installing Rear Brake Shoes

Lubricate with a thin film the shoe tab contact area (3 places) on support plate with Chrysler Parts Multi-purpose Grease, Part number 2932524 or equivalent (Fig. 11).

(1) Install parking brake lever on inner side of secondary shoe web after lubricating pivot with support plate lubricant. Secure with wave washer and horseshoe clip.

(2) Engage parking brake lever with cable, then hold secondary shoe against support plate, and at the same time engage shoe web with push rod, (if so equipped) and against anchor.

(3) Slide parking brake strut behind hub and into slot in parking brake lever. Slide anti-rattle spring over free end of strut (Fig. 13). On ten inch brakes, be sure spring tab is pointing rearward and up on inside of shoe web (Left Brake), and pointing forward and down behind shoe web (Right Brake) (Fig. 13). On eleven inch brakes, be sure spring tab is pointing forward, down and inside of shoe web (both Left and Right Brake) (Fig. 5).

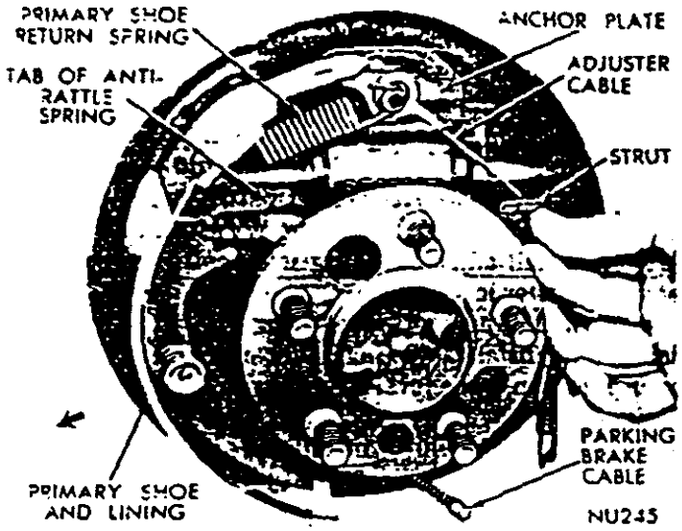

Fig. 13—Removing or Installing Parking Brake Strut and Spring—(Left Rear)

(4) Slide primary shoe into position and engage with push rod (if so equipped) and free end of strut. Install anchor plate over anchor, then install eye of adjuster cable over anchor (Fig. 14).

(5) Engage primary shoe return spring in web of shoe and install free end over anchor, using Tool C-3785. (Fig. 7).

(6) Install cable guide in secondary shoe web. Holding in position, engage secondary shoe return spring through guide and into web. Install other end over anchor, using Tool C-3785. (Be sure cable guide remains flat against shoe web and that secondary spring overlaps primary) (Fig. 1). Using pliers, squeeze ends of spring loops (around anchor) until parallel.

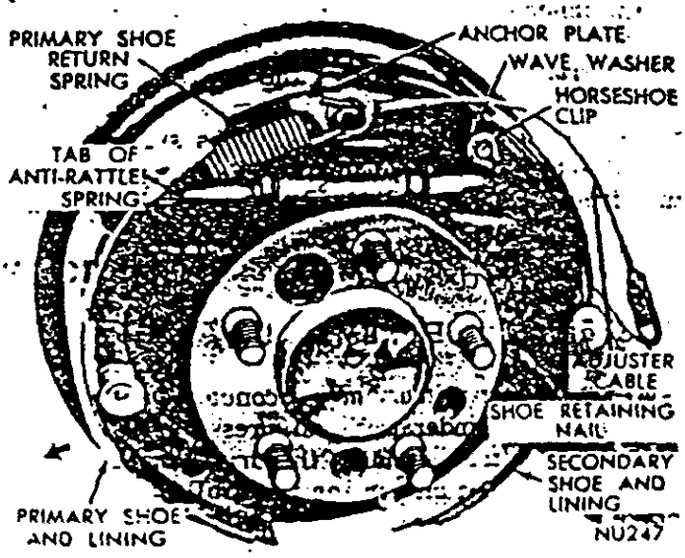

Fig. 14—Installing Brake Shoes—(Left Rear)

(7) Install adjusting star wheel assembly between primary and secondary shoes, with star wheel next to secondary shoe (Fig. 1). The left star wheel adjusting stud end is stamped "L" (indicating its position on the vehicle) and is also cadium plated. The right star wheel is black, and the adjusting stud end is not stamped. Install adjuster spring between shoes (Figs. 1, 4 and 5). (Engage primary shoe first). (Eleven inch brakes, install adjuster spring with coil forward, opposite adjuster lever, Fig. 5).

(8) Install adjusting lever spring over pivot pin on shoe web. Install adjusting lever under spring and over pivot pin. Slide lever slightly rearward to lock in position.

(9) Using Tool C-4070, install shoe retaining nails, retainers and springs (Fig. 8).

(10) Thread adjuster cable over guide and hook end of overload spring in lever (Fig. 1). (Be sure eye of cable is pulled tight against anchor and in a straight line with guide).

BRAKE DRUM INSTALLATION

Installing Front Brake Drums

(1) Lubricate wheel bearings and install brake drum and adjust wheel bearing to proper preload.

(2) Adjust brakes as described under "Service Adjustments" at front of this Group.

Installing Rear Brake Drums

(1) Install brake drum. Reinstallation of retaining clips is not necessary. Install wheel and tire assembly.

(2) Adjust brakes as described under "Service Adjustments" at front of this Group.

MASTER CYLINDER

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GENERAL INFORMATION

The vehicle identification number on the instrument panel starts with a capital letter which indicates the carline or sales name of vehicle (see Introduction of this manual). These code letters are also used to indicate the vehicle to which the service information applies.

The tandem master cylinder (Fig. 1) is of the compensating type with the reservoirs cast integrally.

The front outlet tube from the master cylinder is connected to the hydraulic system warning switch tee and then to the rear brakes. This system is referred to as SECONDARY (marked R). The rear outlet tube from the master cylinder is also connected to the warning switch tee and the front brakes. This system is referred to as PRIMARY (marked F). The master cylinder used on a vehicle not equipped with a power brake unit is serviced in the same manner as the master cylinder with a power brake unit, with one exception, the master cylinder for power brakes does not include the pushrod.

The disc brake master cylinder is different from the drum brake master cylinder in reservoir, cover, bail, and gasket size, and only THE SECONDARY OUTLET HAS RESIDUAL PRESSURE VALVE AND SPRING (Fig. 1).

SERVICE PROCEDURES

MASTER CYLINDER REMOVAL

(1) Disconnect primary and secondary brake tubes from master cylinder (residual pressure valves will k cylinder from draining the drum brake master cylinder). Install a plug in the rear outlet of the disc brake master cylinder.

(2) Remove nuts that attach master cylinder to cowl panel and/or power brake unit (if so equipped).

(3) Disconnect pedal push rod (manual brakes) from brake pedal.

(4) Slide master cylinder straight out from cowl panel and/or power brake unit (if so equipped).

DISASSEMBLING MASTER CYLINDER

To disassemble the master cylinder, (Fig. 1) clean outside of master cy ler thoroughly.

37. **Sales Material**

Has Defendant at any time, published and/or distributed any sales brochures, promotional pamphlets, product manuals, specification sheets or other written sales materials or documents of any kind or character? If so, please:

A. Identify each such document and the custodian thereof;

B. State for what period of time you published and/or distributed sales brochures, promotional pamphlets, product manuals, specification sheets, or other written sales material or documents without any form of warnings, cautions, hazard statements or explanations concerning asbestos.

Answer:

See Answer to Interrogatory Number 33.

38. **Advertisement**

If you advertised any of your asbestos-containing products, listed in your response to interrogatory 14, in newspapers, magazines, or other publications at any time from 1930 to the present, please state for each such advertisement that contained a warning regarding your products:

A. The name of the publication in which it appeared, including the date and page number;

B. A complete transcript of the advertisement and a description of any pictures accompanying it;

C. The name and address of the person or agency that was responsible for approving each such advertisement;

D. The name and address of whoever has current custody of the above-described advertising literature; and

E. Identify all documents relating to such advertisements and the custodian thereof.

Answer:

See Objection to Interrogatory Number 14 incorporated herein.

39. **Product Usage/Documents**

Has any written material of any kind or character been prepared by Defendant or its agents indicating how your asbestos-containing products should be used and/or maintained (other then information in regards to the hazards, if any, presented by use of the defendant's asbestos containing products)? If so, please state as follows:

A. Identify all such material and the custodian thereof;

B. The name, address and job classification of each person who prepared same; and;

C. The dates and manner in which said material was distributed to purchasers of Defendant's products.

Answer:

See Answer to Interrogatory Number 33.

40. **Notice/Asbestos Injury**

Did Defendant receive notice, prior to 1975, that any person was claiming injury as a result of using asbestos-containing products mined, manufactured, sold and/or used by you? If so, please state as to each such claim.

A. The name of the claimant;

B. The date of notice of the claim;

C. A description of the claim including the type of exposure experienced by the claimant (e.g., mining, milling, manufacturing, insulating, etc.);

D. The type of injuries allegedly sustained;

E. The caption and court, address of the court or workers' compensation file number of the claim;

F. Identify all documents relating to the claim and the custodian thereof.

Answer:

Objection. Chrysler objects to this Interrogatory on the grounds that it is irrelevant, overbroad, not properly limited as to time and unduly burdensome.

41. Please state whether the Defendant has ever been a member of the following business groups (or group with similar name), and if so, answer the following as to each group;

(1) The address of the group;

(2) The years during which you were a member;

(3) Identify all documents in your possession relating in any way to the group, including documents before, during and after the period of your membership and the custodian thereof.

A. Industrial Health Foundation (or one of its predecessors);

B. Asbestos Textile Institute;

C. Asbestos Information Association of North America;

D. National Mineral Wool Producers Association;

E. Asbestos Cement Pipe Producers Association;

F. Magnesia Insulation Manufactures Association;

G. American Industrial Hygiene Association;

H. Brake Lining Manufactures Association;

I. Friction Materials Standards Institute, Inc.;

J. Asbestos Brake Lining Manufactures Institute;

K. Quebec Asbestos Mining Association;

L. Institute of Occupational and Environmental Health of Quebec Asbestos Mining Association;

M. American Society for Testing and Materials;

N. Grinding Wheel Institute;

O. Trudeau Foundation;

P. National Safety Council;

Q. National Insulation Manufacture Association; and

R. The Refractories Institute;

Answer:

Objection. Chrysler objects to this Interrogatory on the grounds that it is overbroad, unduly burdensome and not properly limited as to time. Answering this Interrogatory would require making inquiry of thousands of Chrysler employees, past and present, which would be unduly burdensome. Without waiving these objections, Chrysler or Chrysler employees, or both, have had memberships in the American Industrial Hygienist Association, The Friction Material Safety Institute, The Industrial Hygiene Foundation, The American Academy of Industrial Hygienist, National Safety Council, The Motor Vehicle Manufactures Association, The Battery Council International, The Society of Automobile Engineers, and The Engineering Society of Detroit. It is also known that Chrysler in the past, has belonged to The Friction Materials Safety Institute and The Motor Vehicle Manufacturers Association.

42. **Library**

Please state whether Defendant ever maintained any form of library or collection of books and publications. If so, state the following as to each such library;

A. The original location of the library, including the building in which it was located;

B. The years during which the library was in operation;

C. The offices, plant facilities, departments or other organizational units serviced by the library;

D. Identify each custodian of the library or librarian as well as the years of his service as librarian

Answer:

Objection. Chrysler objects to this Interrogatory on the ground that it is irrelevant, overbroad, unduly burdensome, not properly limited as to time and not reasonably calculated to lead to the discovery of admissible evidence. Notwithstanding and without waiving these objections, the Industrial Hygiene Department and Medical Department at Chrysler maintains reference libraries.

STATE OF MICHIGAN)
) ss:
COUNTY OF)

BEFORE ME, the undersigned authority, PAUL KELL Y, duly sworn, deposes and says that he is the Parts Marketing Manager for CHRYSLER CORPORATION, in the matter of *Tinker v. Chrysler Corporation, et. al.*, who is to me personally known and who did take an oath; that he has read the foregoing Responses to Plaintiffs' First Set of Interrogatories; that the foregoing Responses of CHRYSLER CORPORATION, is based on information communicated to him by personnel of CHRYSLER CORPORATION, and information obtained from books and records of CHRYSLER CORPORATION, and he believes the foregoing Responses to be true and correct to the best of his knowledge, information and belief.

PAUL KELL Y
Parts Marketing Manager
CHRYSLER CORPORATION

SWORN TO AND SUBSCRIBED before me this 29th day of SEPTEMBER, 1995.

NOTARY PUBLIC

MICHAEL J. WEISE
Notary's Printed Name

My Commission Expires:

MICHAEL J. WEISE
NOTARY PUBLIC – MACOMB COUNTY, MICH.
MY COMMISSION EXPIRES 2-11-97

DRUM BRAKES

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GENERAL INFORMATION

All drum brake applications are two shoe, internal expanding brakes with application adjusters. The lower ends of the brake shoes are connected by a tubular star wheel adjusting screw (Figs. 1 and 2).

CAUTION: When servicing brake assemblies or components, do not create dust by sanding, grinding or by cleaning brake parts with a dry brush or with compressed air. A water dampened cloth should be used. Many brake components contain asbestos fibers which can become airborne if dust is created during service operations. Breathing dust which contains asbestos fibers can cause serious bodily harm.

SERVICE PROCEDURES

BRAKE DRUM REMOVAL

(1) Remove rear plug from brake adjusting access hole.

(2) Insert a thin screwdriver into brake adjusting hole and hold adjusting lever away from notches of adjusting screw.

(3) Insert Tool C-3784 into brake adjusting hole and engage notches of brake adjusting screw. Release brake by prying down with adjusting tool.

(4) Remove rear wheel and clips from wheel studs that holds drum on axle. Discard clips. Remove drums.

(5) Inspect brake lining for wear, shoe alignment, or contamination from grease or brake fluid.

BRAKE SHOE REMOVAL

(1) Remove rear wheel, and drum retaining clips. Remove drum.

(2) Using Tool C-3785, remove brake shoe return springs (Fig. 3). (Note how secondary shoe return spring overlaps primary shoe return spring) (Figs 1 or 2).

(3) Slide eye of automatic adjuster cable off anchor and then unhook from adjusting lever. Remove cable, overload spring, cable guide and anchor plate.

(4) Disengage adjusting lever from spring by sliding forward to clear pivot, then working out from under spring. Remove spring from pivot. Remove shoe to shoe spring from secondary shoe web and disengage from primary shoe web. Remove spring.

(5) Disengage primary and secondary shoes and remove adjusting star wheel assembly from shoes.

(6) Remove brake shoe retainers, springs and nails using Tool C-4070. (Fig. 4), and remove from support.

(7) Remove parking brake lever from secondary shoes. Remove shoes.

(8) Disengage parking brake lever from parking brake cable.

CLEANING AND INSPECTION

Wipe or brush clean (dry) the metal portions of

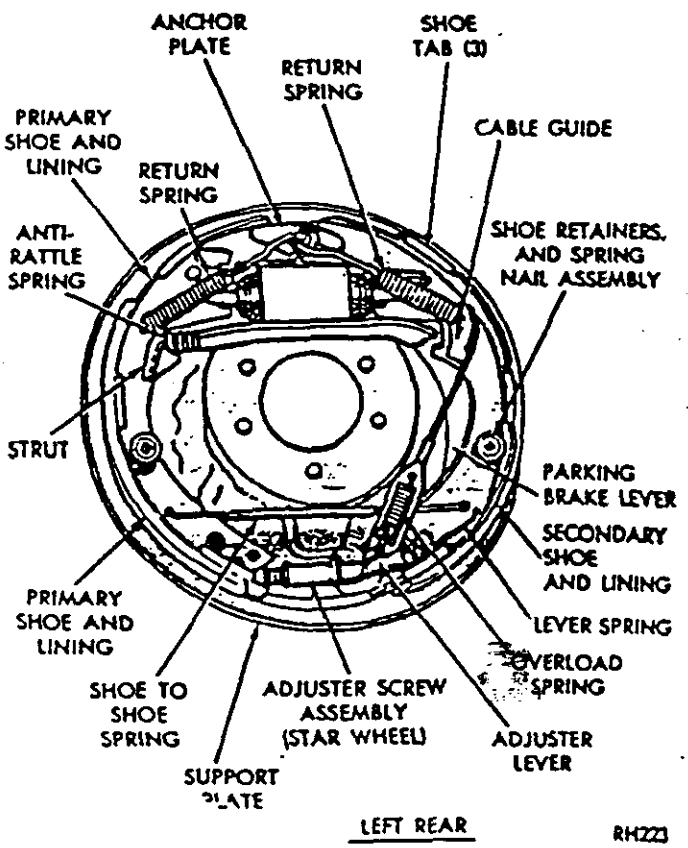

Fig. 1—Ten Inch Brake Assembly

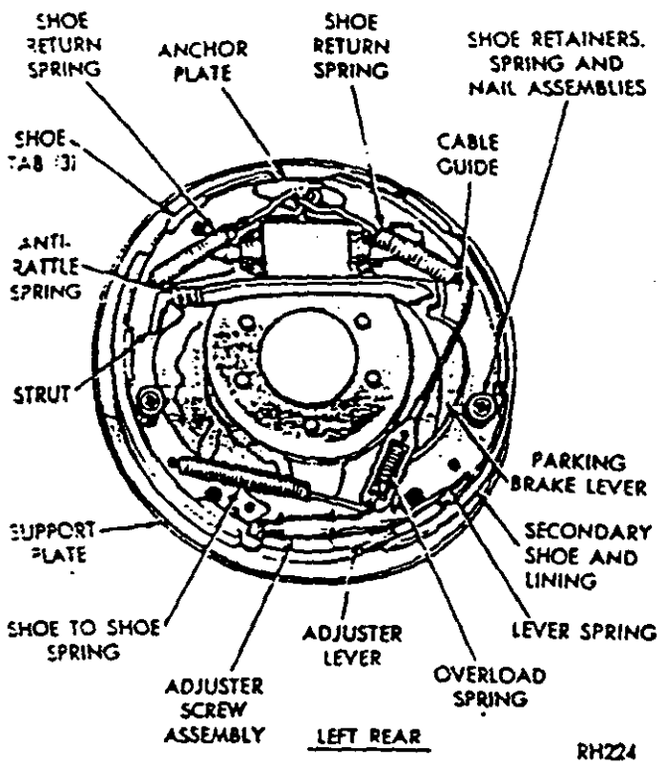

Fig. 2—Eleven Inch Brake Assembly

the brake shoes. Examine the lining contact pattern to determine if the shoes are bent. The lining should show contact across the entire width, extending from heel to toe. Shoes showing contact only on one side should be replaced. Shoes having sufficient lining but lack of contact at toe and heel may be improperly ground.

Clean the support, using a suitable solvent, then inspect for rough or rusted shoe contact areas. Clean and inspect the adjusting screws for damaged threads, then apply a thin film of lubricant to the threads.

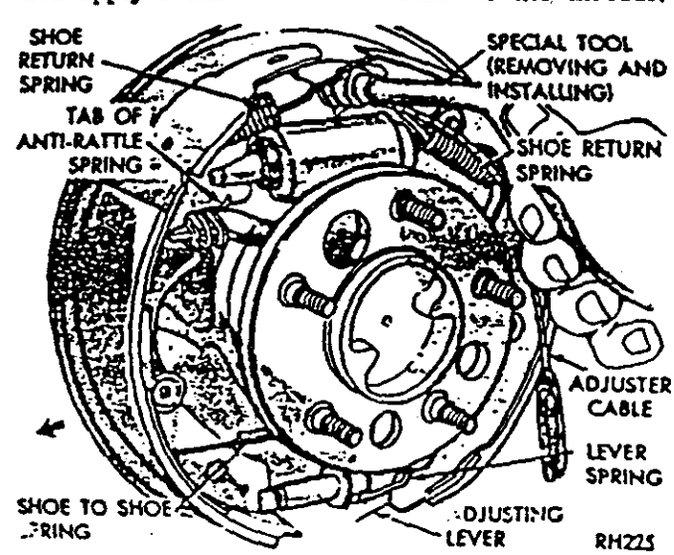

Fig. 3—Removing Shoe Return Springs

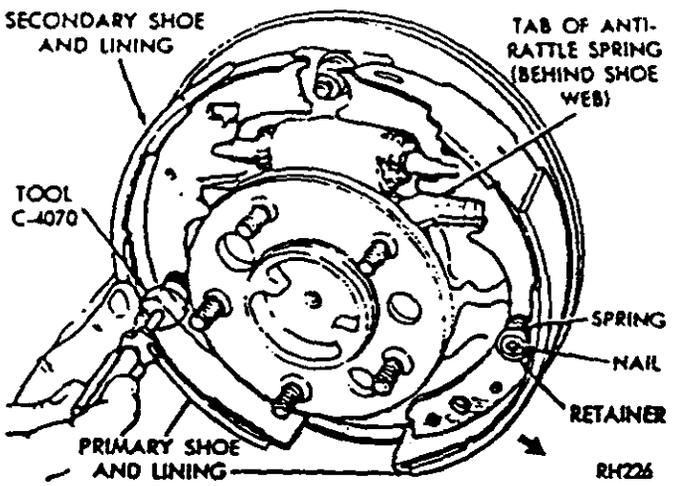

Fig. 4—Removing or Installing Shoe Retainers, Springs and Nails

socket and washer (Fig. 5). Replace adjuster screw assembly if corrosion of any part inhibits very free operation.

Install new brake shoe return springs and hold down springs where the old springs have been subjected to overheating or if their strength is questionable. Spring paint discoloration or distorted end coils indicate a spring that had been overheated.

DRUM REFACING RECOMMENDATIONS

Drum Refacing—Measure the drum runout and diameter with an accurate gauge. There should be no variation in the drum diameter greater than .002 inch. Drum runout should not exceed .006 inch out of round. If the drum runout or diameter variation exceed these values the drum should be refaced. For best results in eliminating the irregularities that cause brake roughness and surge, the amount of material removed during a single cut should be limited to .005 inch. When the entire braking surface has been cleaned a final cut of .001 inch will assure a good drum surface providing the equipment used is capable of giving the precision required for resurfacing brake drums. Deeper cuts are permissible for the sole purpose of removing deep score marks. **Do not reface more than .060 inch over the standard drum diameter.**

All drums will show markings of maximum allow-

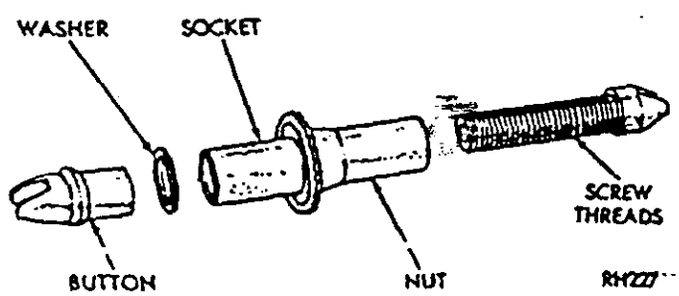

Fig. 5- Adjuster Screw Assembly

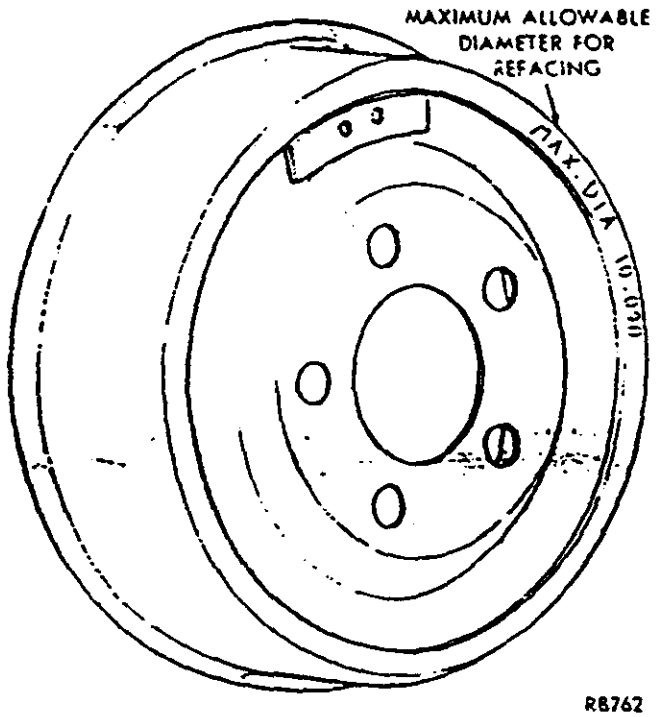

Fig. 6—Ten Inch Drum-Maximum Diameter Identification

able diameter (Fig. 6). For example, a ten inch drum will have a marking of MAX. DIA. 10.090 inch. This marking includes .030 inch for alowable drum wear beyond the recommended .060 inch of drum refacing.

BRAKE SHOE INSTALLATION

Lubricate the six shoe tab contact pads on support plate with a thin film of MOPAR Multi-Purpose Lubricant. Part number 2932524 or equivalent (Fig. 7).

(1) Engage parking brake lever with cable. Install parking brake lever into rectangular hole of secondary brake shoe.

(2) Slide secondary shoe against support plate, at

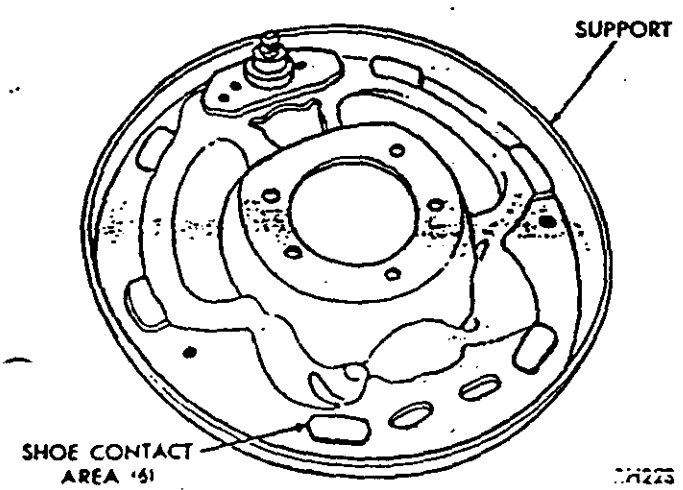

Fig. 7—Shoe Contact Pads on Support

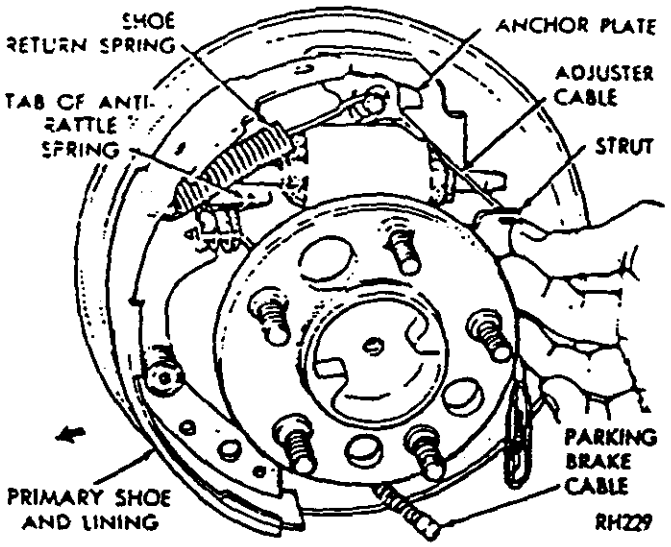

Fig. 8—Removing or Installing Parking Brake Strut and Spring

the same time engage shoe web with push rod and against anchor.

(3) Slide parking brake strut behind axle flange and into slot in parking brake lever. Slide anti-rattle spring over free end of strut (Fig. 8). On ten inch brakes. be sure spring tab is pointing rearward and up on outside of shoe web (Left Brake), and pointing frontward and down behind shoe web (Right Brake).

(4) Slide primary shoe into position and engage with push rod (if so equipped) and free end of strut. Install anchor plate over anchor, then install eye of adjuster cable over anchor (Fig. 9).

(5) Engage primary shoe return spring in web of shoe and install free end over anchor, using Tool C-3785.

(6) Insert protruding hole rim of cable guide into hole in secondary shoe web. Holding guide in position. engage secondary shoe return spring through

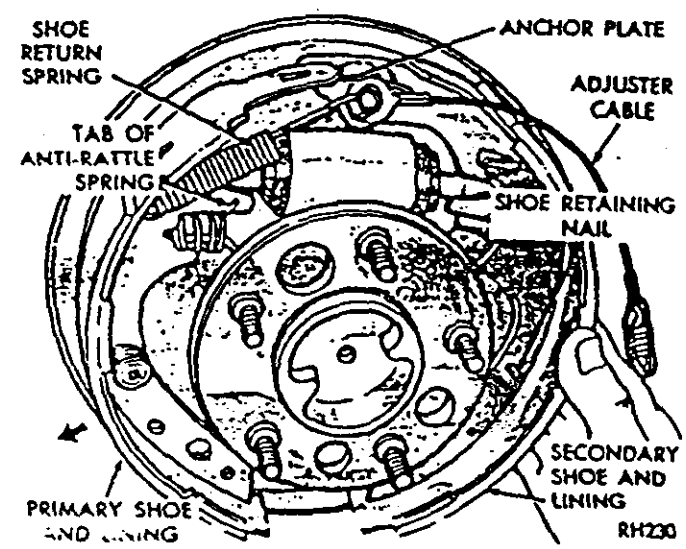

Fig. 9—Installing Brake Shoes

hole in guide, and hole in web. Using Tool C-3785, install spring over anchor. (Be sure cable guide remains flat against shoe web and that secondary spring overlaps primary) (Fig. 1). Using pliers, squeeze ends of spring loops (around anchor) until parallel.

(7) Install adjusting star wheel assembly between primary and secondary shoes, with star wheel next to secondary shoe (Fig. 1). The left star wheel adjusting stud end is stamped "L" (indicating its position on the vehicle) and the star wheel is cadmium plated. The right star wheel is black and the adjusting stud end is stamped "R". Install shoe to shoe spring between shoes (Figs. 1 and 2). (Engage primary shoe first). (Eleven inch brakes, install shoe to shoe spring with coil forward, opposite adjuster lever, Fig. 2).

(8) Install adjusting lever spring over pivot pin on shoe web. Install adjusting lever under spring and over pivot pin. Slide lever slightly rearward to lock in position.

(9) Using Tool C-4070, install shoe retaining nails, retainers and springs (Fig. 4).

(10) Thread adjuster cable over guide and hook end of overload spring in lever (Fig. 1). (Be sure eye of cable is pulled tight against anchor and in a straight line with guide).

BRAKE DRUM INSTALLATION

(1) Install brake drum. Reinstallation of retaining clips is not necessary. Install wheel and tire assembly as described under "Wheel Stud Nut Tightening".

(2) Adjust brakes as described under "Service Adjustments" at front of this Group.

REMOVING BRAKE SUPPORT

(1) With wheel and brake drum removed, remove brake shoe assemblies and disconnect brake cable.

(2) Using a suitable tool such as an aircraft type hose clamp compress the flared legs of cable retainer and pull brake cable out of support plate (Fig. 10).

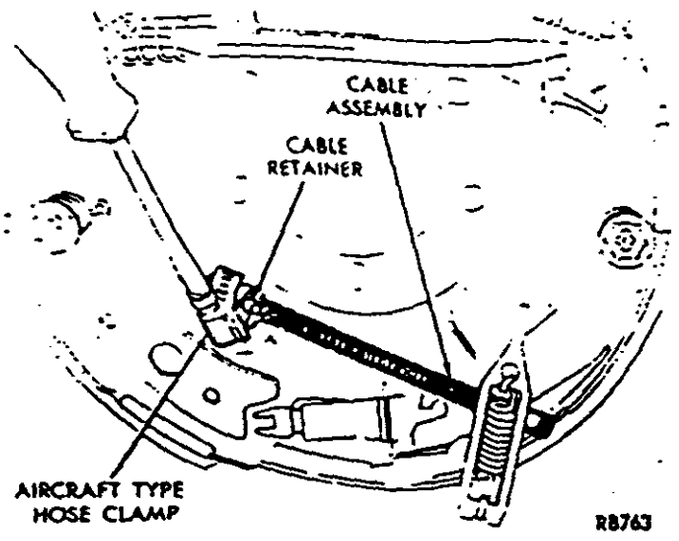

Fig. 10—Removing Brake Cable From Support Plate

(3) Disconnect hydraulic brake tube from wheel cylinder.

(4) Remove support to wheel cylinder attaching nuts and washers.

(5) Remove rear axle shaft and retainer. Refer to "Rear Axle," Group 3.

(6) Remove brake support from rear axle housing.

INSTALLING BRAKE SUPPORT

(1) Install support plate onto rear axle housing.

(2) Insert rear axle shaft and retainer into housing and install axle retainer nuts and washers. Refer to "Rear Axle," Group 3.

(3) Install wheel cylinder and attach hydraulic brake tube.

(4) Insert parking brake cable into support plate and attach cable to parking brake lever.

(5) Install brake shoes on support plate.

(6) Install brake drum and wheel. Adjust and bleed brakes.

MASTER CYLINDER

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GENERAL INFORMATION

The body of the two piece master cylinder (Fig. 1), is made of aluminum and the reservoir is made of nylon.

The two compartments of the reservoir are interconnected to permit equalization of the fluid level.

However, a sufficient quantity of fluid is retained in the reservoir of the unaffected system to permit operation of that half of the master cylinder even if

Asbestos Warning Label 1983 - 1987

CAUTION

THIS PRODUCT CONTAINS ASBESTOS.
AVOID CREATING DUST. BREATHING
ASBESTOS MAY RESULT IN SERIOUS
BODILY HARM.

bestos Warning Label 1987 - Present

DANGER

CONTAINS ASBESTOS FIBERS
AVOID CREATING DUST
CANCER AND LUNG DISEASE
HAZARD

Service & Parts Operations
Chrysler Motors

May 12, 1988

PACKAGE ENGINEERING DEPARTMENT

SERVICE PARTS PROCESSING & PACKAGING SPECIFICATION

7D787	PART NAME: ENGC TKG & LIGHTING ART W/L DISC BRK	PART NO: 04383580
NO	NPR:	SENT OF UNPACKAGED MATERIAL PER 1-36 STD.: REQUIRED
		VENDOR NO: NO STK #
FING		PART TYPE CODE: 95-003 303

ATION OF ALL CONTAINERS PER 1-20 STANDARD

	CONTAINER NO / VENDOR	DESCRIPTION OF CONTAINER
	CONTAINER SIZE:	CLOSURE: SEE NOTE 1

APS

TE QTY	CONTAINER NO	DESCRIPTION OF CONTAINER
	CONTAINER SIZE:	CLOSURE: SEE NOTE 1
	CONTAINER NO	DESCRIPTION OF CONTAINER
	CONTAINER SIZE:	CLOSURE: SEE NOTE 1

ALLET LOAD HEIGHT - 42" INCLUDING PALLET STD. PALLET SIZE 42" x 48" UNLESS DEVIATION AUTHORIZED

PALLET NO:	PALLET DESCRIPTION:

	MACHINE CODE:
OS WARNING LABEL REQ'D	
	ISSUED BY: SPEIGHT

MATERIALS AND/OR PROCESSES MUST BE IN COMPLIANCE WITH LATEST DATE OF ISSUE. THIS CONTINGENCY IS THE SUPPLIER RESPONSIBILITY

NOTE 1: ALL CORRUGATED CARTON CLOSURES TO BE IN ACCORDANCE WITH RULE 41 OF THE UNIFORM FREIGHT CLASSIFICATION. METHOD IS OPTIONAL UNLESS OTHERWISE SPECIFIED.

PACKAGE ENGINEERING DEPARTMENT

RVICE PARTS PROCESSING & PACKAGING SPECIFICATION

'00/85	PART NAME SHOE-LIN ART WHL DISC	PART NO 80021780
O.	NPR / IDENT OF UNPACKAGED MATERIAL PER 1-98 STD.	VENDOR NO. 37A 3683
FING		PART TYPE CODE 05 903-903

ATION OF ALL CONTAINERS PER I-20 STANDARD

	CONTAINER NO. VENDOR	DESCRIPTION OF CONTAINER MAILING CARTON
3L 22	CONTAINER SIZE. 5.25"X 1.5" X 7.75"	CLOSURE. SEE NOTE 1

RAPS

ATE QTY	CONTAINER NO.	DESCRIPTION OF CONTAINER
	CONTAINER SIZE.	CLOSURE. SEE NOTE 1
TY 3	CONTAINER NO. VENDOR	DESCRIPTION OF CONTAINER:
PARS	CONTAINER SIZE.	CLOSURE. SEE NOTE 1

4 PALLET LOAD HEIGHT - 42" INCLUDING PALLET. STD. PALLET SIZE 42" x 48" UNLESS DEVIATION AUTHORIZED

Y	PALLET NO. VENDOR	PALLET DESCRIPTION:

ING CARTON 5.25"X 1.5" X 7.75"	MACHINE CODE:
CTN 15.75"X 5.5" X 8.5" RSC	
STOS WARNING LABEL REQUIRED.	
(04-23-87)	ISSUED BY: J R POWELL

SING MATERIALS AND/OR PROCESSES MUST BE IN COMPLIANCE WITH LATEST DATE OF ISSUE. THIS CONTINGENCY IS THE SUPPLIER RESPONSIBILITY

NOTE 1: ALL CORRUGATED CARTON CLOSURES TO BE IN ACCORDANCE WITH RULE 41 OF THE UNIFORM FREIGHT CLASSIFICATION METHOD IS OPTIONAL UNLESS OTHERWISE SPECIFIED.

(5-87)

(3) Place proper spacer gauge on pedal blade or push rod.

(4) Slide switch assembly toward pedal blade or push rod until switch plunger is fully depressed against spacer gauge (on heavy duty or stop light/speed control switches, depress plunger until switch body contacts spacer gauge).

(5) Re-tighten switch bracket screw to 95 inch pounds.

(6) Remove spacer.

DRUM BRAKES

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GENERAL INFORMATION

Front drum brakes are used on certain V-L models only. All drum brake applications are two shoe, internal expanding brakes with application adjusters. The lower ends of the brake shoes are connected by a tubular star wheel adjusting screw (Figs. 1, 4 and 5).

DRUM BRAKES

SERVICE DIAGNOSIS

Condition	Possible Cause	Correction
PEDAL GOES TO FLOOR	(a) Fluid low in reservoir.	(a) Fill and bleed master cylinder.
	(b) Air in hydraulic brake system.	(b) Fill and bleed hydraulic brake system.
	(c) Improperly adjusted brake.	(c) Repair or replace self-adjuster as required.
	(d) Leaking wheel cylinders.	(d) Recondition or replace wheel cylinder and replace both brake shoes.
	(e) Loose or broken brake lines.	(e) Tighten all brake fittings or replace brake line.
	(f) Leaking or worn master cylinder.	(f) Recondition or replace master cylinder and bleed hydraulic system.
	(g) Excessively worn brake lining.	(g) Reline and adjust brakes.
SPONGY BRAKE PEDAL	(a) Air in hydraulic system.	(a) Fill master cylinder and bleed hydraulic system.
	(b) Improper brake fluid (low boiling point).	(b) Drain, flush and refill with brake fluid.
	(c) Excessively worn or cracked brake drums.	(c) Replace all faulty brake drums.
	(d) Broken pedal pivot bushing.	(d) Replace nylon pivot bushing.
BRAKES PULLING	(a) Contaminated lining.	(a) Replace contaminated brake lining.
	(b) Front end out of alignment.	(b) Align front end.
	(c) Incorrect brake adjustment.	(c) Adjust brakes and check fluid.
	(d) Unmatched brake lining.	(d) Match primary, secondary with same type of lining on all wheels.
	(e) Brake shoes distorted.	(e) Replace faulty brake shoes.
	(f) Restricted brake hose or line.	(f) Replace plugged hose or brake line.
	(g) Broken rear spring.	(g) Replace broken spring.
SQUEALING BRAKES	(a) Glazed brake lining.	(a) Cam grind or replace brake lining.
	(b) Saturated brake lining.	(b) Replace saturated lining.

Condition	Possible Cause	Correction
	(c) Weak or broken brake shoe retaining spring.	(c) Replace retaining spring.
	(d) Broken or weak brake shoe return spring.	(d) Replace return spring.
	(e) Incorrect brake lining.	(e) Install matched brake lining.
	(f) Distorted brake shoes.	(f) Replace brake shoes.
	(g) Bent support plate.	(g) Replace support plate.
	(h) Dust in brakes or scored brake drums.	(h) Blow out brake assembly with compressed air and reface brake drums.
CHIRPING BRAKES	(a) Out of round drum or eccentric axle flange pilot.	(a) Repair as necessary, and lubricate support plate contact areas (6 places).
DRAGGING BRAKES	(a) Incorrect wheel or parking brake adjustment.	(a) Adjust brakes and check fluid.
	(b) Parking brakes engaged.	(b) Release parking brakes.
	(c) Weak or broken brake shoe return spring.	(c) Replace brake shoe return spring.
	(d) Brake pedal binding.	(d) Free up and lubricate brake pedal and linkage.
	(e) Master cylinder cup sticking.	(e) Recondition master cylinder.
	(f) Obstructed master cylinder relief port.	(f) Use compressed air and blow out relief port.
	(g) Saturated brake lining.	(g) Replace brake lining.
	(h) Bent or out of round brake drum.	(h) Reface or replace faulty brake drum.
	(i) Incorrect stop light switch adjustment.	(i) Adjust stop light switch.
HARD PEDAL	(a) Brake booster inoperative.	(a) Replace brake booster.
	(b) Incorrect brake lining.	(b) Install matched brake lining.
	(c) Restricted brake line or hose.	(c) Clean out or replace brake line or hose.
	(d) Frozen brake pedal linkage.	(d) Free up and lubricate brake linkage.
WHEEL LOCKS	(a) Contaminated brake lining.	(a) Reline both front or rears of all four brakes.
	(b) Loose or torn brake lining.	(b) Replace brake lining.
	(c) Wheel cylinder cups sticking.	(c) Recondition or replace wheel cylinder.
	(d) Incorrect wheel bearing adjustment.	(d) Clean, pack and adjust wheel bearings.
BRAKES FADE (HIGH SPEED)	(a) Incorrect lining.	(a) Replace lining.
	(b) Overheated brake drums.	(b) Inspect for dragging brakes.
	(c) Incorrect brake fluid (low boiling temperature).	(c) Drain flush, refill and bleed hydraulic brake system.
	(d) Saturated brake lining.	(d) Reline both front or rear or all four brakes.
SURGE Below 15 MPH	(a) Bent or out of round rear brake drum.	(a) Reface or replace brake drum.
CHATTER 80 to 40 MPH	(a) Bent or out of round front brake drum.	(a) Reface or replace brake drum.
SHOE KNOCK	(a) Machine grooves in contact face of brake drum.	(a) Sand, reface or replace brake drum.
	(b) Weak hold down springs.	(b) Replace hold down springs.
AKES DO NOT SELF ADJUST	(a) Adjuster screw frozen in thread.	(a) Clean and free-up all thread areas.
	(b) Adjuster screw corroded at thrust washer.	(b) Clean threads and replace thrust washer if necessary.
	(c) Adjuster lever does not engage star wheel.	(c) Repair, free up or replace adjuster as required.
	(d) Adjuster installed on wrong wheel.	(d) Install correct adjuster parts.

SERVICE PROCEDURES

The eleven inch brakes used on taxi vehicles. (Fig. 6) are equipped with manual adjusters. The service procedures covering these brakes are identical to the passenger car. with the exception of reference to application adjusters. Illustrations of the various service procedures will not always show any one specific brake.

BRAKE DRUM REMOVAL

Removing Front Brake Drums—(Nine inch brake only)

To aid in brake drum removal loosen brake star adjusting wheel.

(1) Remove rear plug from brake adjusting access hole.

(2) Insert a thin screwdriver into brake adjusting hole and push adjusting lever away from star adjusting wheel. Care should be taken not to bend adjusting lever.

(3) Insert Tool C-3784 into brake adjusting hole and engage notches of brake adjusting star wheel. Release brake adjustment by prying down with adjusting tool.

(4) Remove wheel cover, grease cap, cotter pin, lock, adjusting nut, outer wheel bearing and remove wheel and drum assembly from spindle to expose brake linings (Fig. 1).

(5) Inspect brake lining for wear, shoe alignment, or contamination from grease or brake fluid.

Removing Rear Brake Drums

(1) Remove rear plug from brake adjusting access hole.

(2) Insert a thin screwdriver into brake adjusting hole and hold adjusting lever away from notches of adjusting screw.

(3) Insert Tool C-3784 into brake adjusting hole and engage notches of brake adjusting screw. Release brake by prying down with adjusting tool.

(4) Remove rear wheel and clips from wheel studs that holds drum on axle. Discard clips. Remove drums.

(5) Inspect brake lining for wear, shoe alignment or contamination from grease or brake fluid.

BRAKE SHOE REMOVAL

Removing Front Brake Shoes

(1) Using Tool C-3785 remove brake shoe return

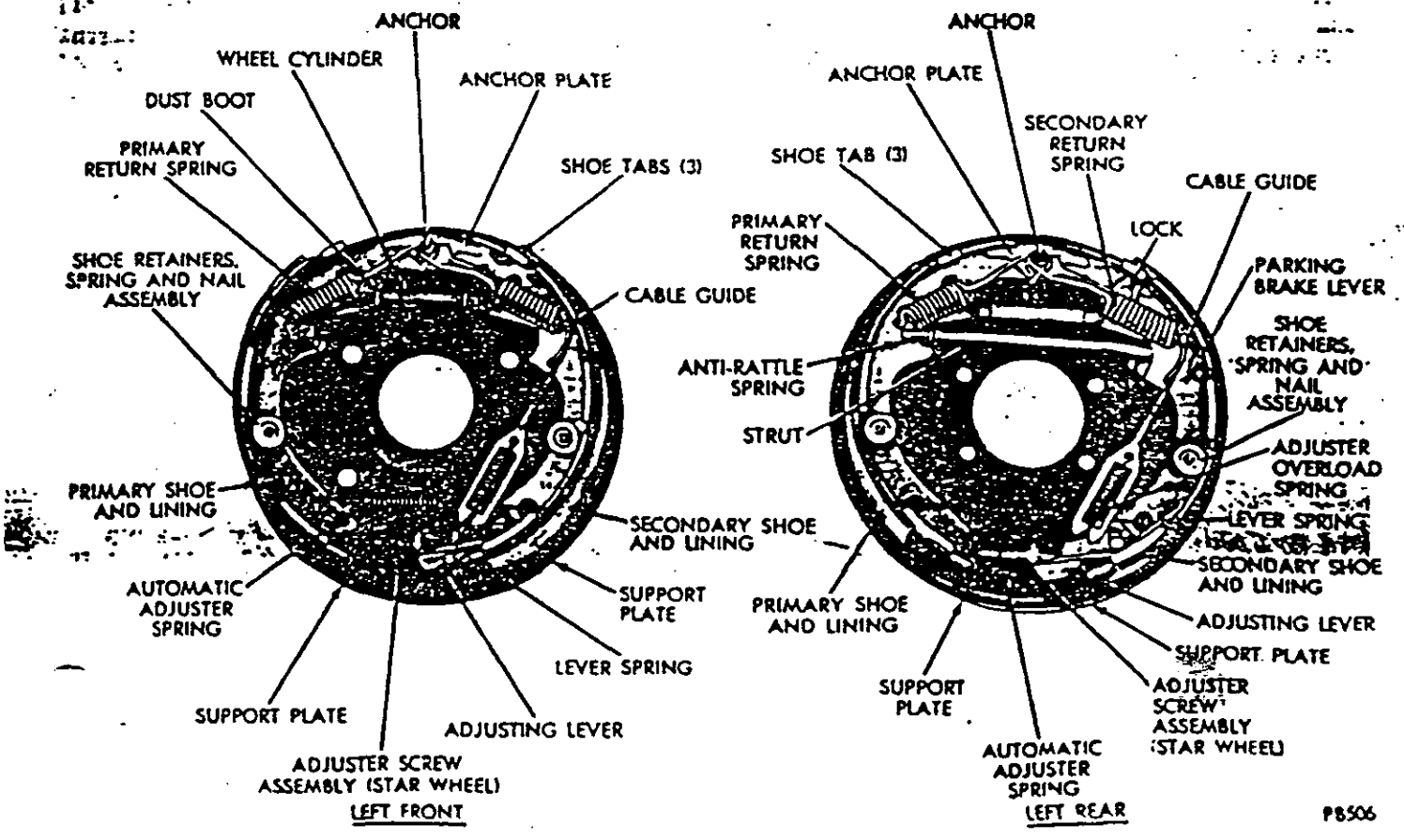

Fig. 1—Nine Inch Brake Assemblies

springs (Fig. 2). (Note how secondary spring overlaps primary spring), (Fig. 1).

(2) Slide eye of automatic adjuster cable off anchor and unhook from adjusting lever. Remove cable, overload spring, cable guide and anchor plate.

(3) Disengage adjusting lever from spring by sliding forward to clear pivot, then working out from under spring. Remove spring from pivot. Remove automatic adjuster spring from secondary shoe web and disengage from primary shoe web. Remove spring.

(4) Remove brake shoe retainers, springs and nails, using Tool C-4070. (Fig. 3).

(5) Remove primary and secondary shoes from support. Remove adjusting star wheel screw assembly from shoes.

Removing Rear Brake Shoes

(1) Remove rear wheel, and drum retaining clips. Remove drum.

(2) Using Tool C-3785, remove brake shoe return springs (Fig. 7). (Note how secondary spring overlaps primary spring) (Figs. 1, 4, 5 or 6).

(3) Slide eye of automatic adjuster cable off anchor and then unhook from adjusting lever. Remove cable, overload spring, cable guide and anchor plate.

(4) Disengage adjusting lever from spring by sliding forward to clear pivot, then working out from under spring. Remove spring from pivot. Remove automatic adjuster spring from secondary shoe web and ngage from primary shoe web. Remove spring.

(5) Disengage primary and secondary shoes from push rods (if so equipped) and remove adjusting star wheel assembly from shoes.

(6) Spread anchor ends of primary and secondary shoes and remove parking brake lever strut and anti-rattle spring (Fig. 13).

(7) Remove brake shoe retainers, springs and nails. Using Tool C-4070, (Fig. 8), and remove from

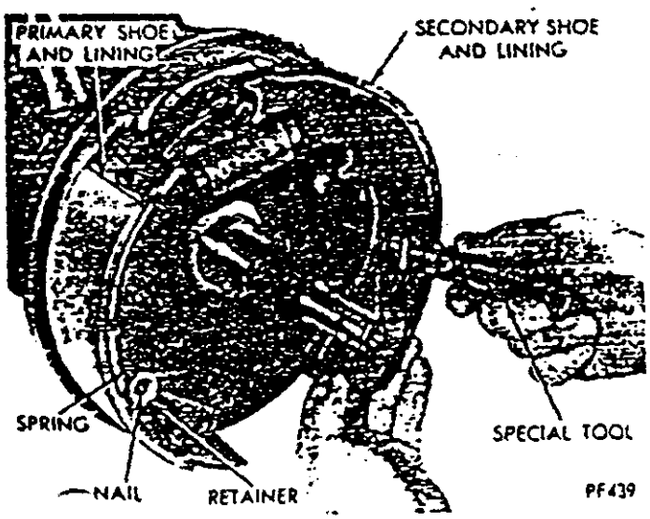

Fig. 2—Removing Shoe Return Springs (Left Front)

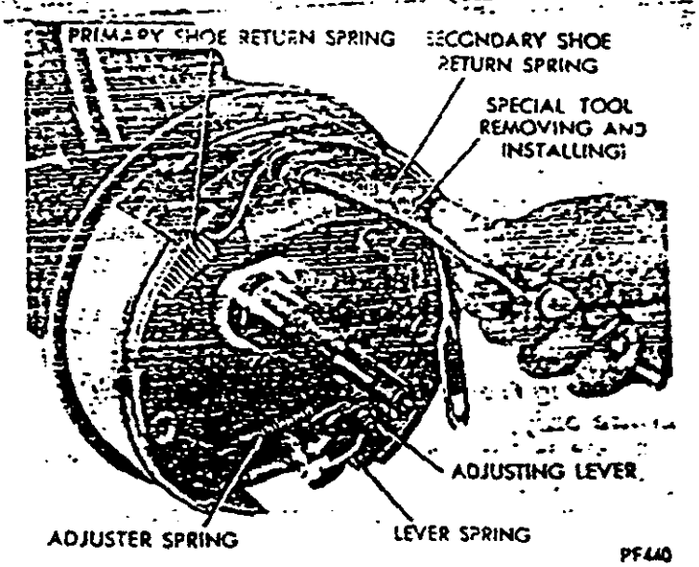

Fig. 3—Removing or Installing Shoe Retainers, Spring and Nails (Right Front)

support.

(8) Disengage parking brake cable from parking brake lever.

CLEANING AND INSPECTION

Wipe or brush clean (dry) the metal portions of the brake shoes. Examine the lining contact pattern to determine if the shoes are bent. The lining should

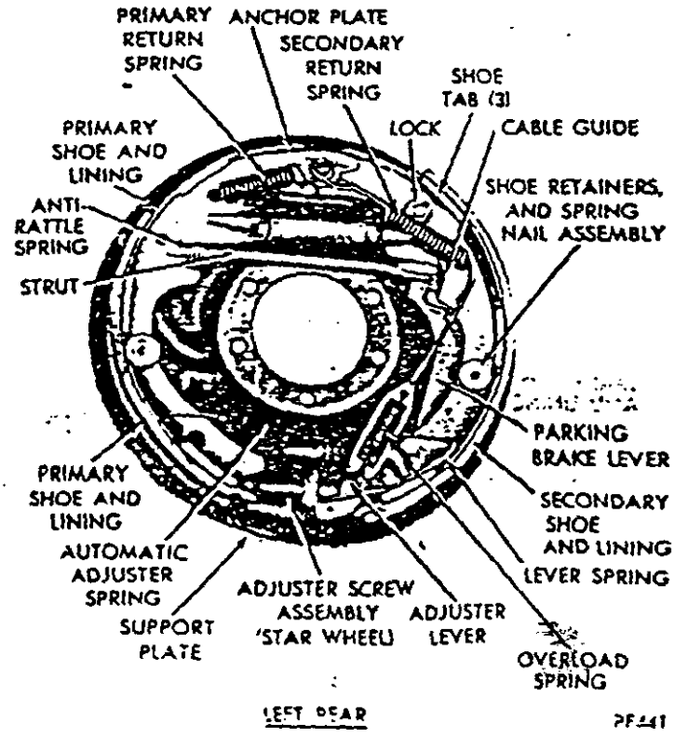

Fig. 4—Ten Inch Brake Assembly—(Rear)

ngs (Fig. 2). (Note how secondary spring overlaps primary spring). (Fig. 1).

(2) Slide eye of automatic adjuster cable off anchor and unhook from adjusting lever. Remove cable, overload spring, cable guide and anchor plate.

3) Disengage adjusting lever from spring by sliding forward to clear pivot, then working out from under spring. Remove spring from pivot. Remove automatic adjuster spring from secondary shoe web and disengage from primary shoe web. Remove spring.

(4) Remove brake shoe retainers, springs and nails, using Tool C-4070. (Fig. 3).

(5) Remove primary and secondary shoes from support. Remove adjusting star wheel screw assembly from shoes.

Removing Rear Brake Shoes

(1) Remove rear wheel, and drum retaining clips. Remove drum.

(2) Using Tool C-3785, remove brake shoe return springs (Fig. 7). (Note how secondary spring overlaps primary spring) (Figs. 1, 4, 5 or 6).

(3) Slide eye of automatic adjuster cable off anchor and then unhook from adjusting lever. Remove cable, overload spring, cable guide and anchor plate.

(4) Disengage adjusting lever from spring by sliding forward to clear pivot, then working out from under spring. Remove spring from pivot. Remove automatic adjuster spring from secondary shoe web and disengage from primary shoe web. Remove spring.

(5) Disengage primary and secondary shoes from push rods (if so equipped) and remove adjusting star wheel assembly from shoes.

(6) Spread anchor ends of primary and secondary shoes and remove parking brake lever strut and anti-rattle spring (Fig. 13).

(7) Remove brake shoe retainers, springs and nails. Using Tool C-4070, (Fig. 8), and remove from support.

(8) Disengage parking brake cable from parking brake lever.

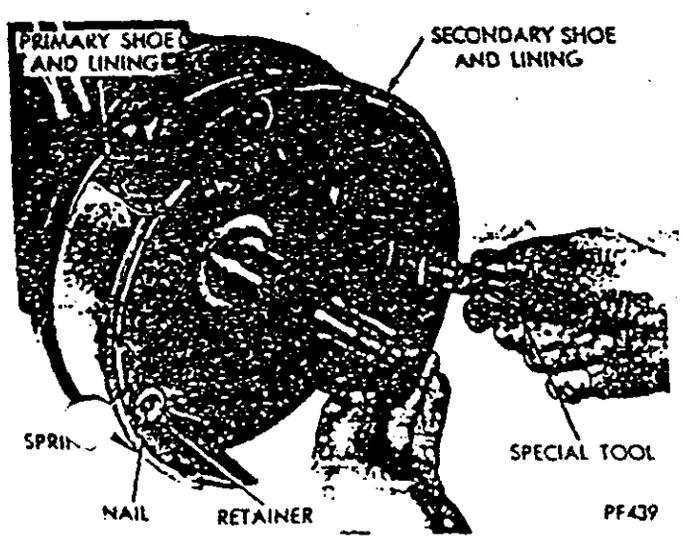

Fig. 2—Removing Shoe Return Spring (Left Front)

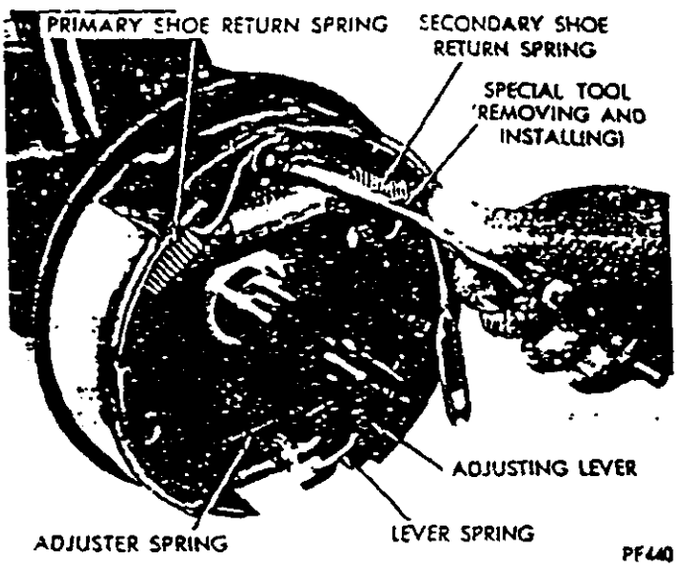

Fig. 3—Removing or Installing Shoe Retainers, Spring and Nails (Right Front)

CLEANING AND INSPECTION

Wipe or brush clean (dry) the metal portions of the brake shoes. Examine the lining contact pattern to determine if the shoes are bent. The lining should

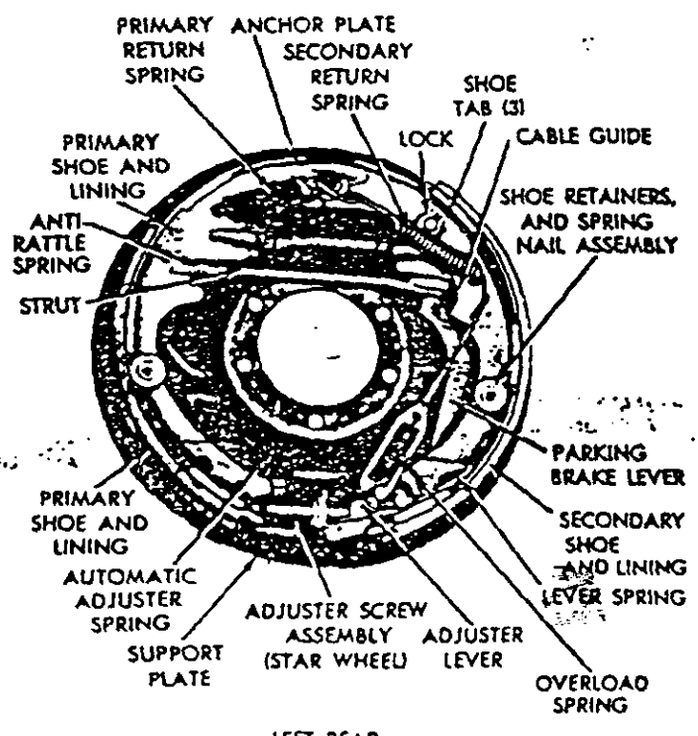

Fig. 4—Ten Inch Brake Assembly—(Rear)

IN THE CIRCUIT COURT OF THE
11TH JUDICIAL CIRCUIT IN AND
FOR DADE COUNTY, FLORIDA

GENERAL JURISDICTION DIVISION

CASE NO.: 95-10261 CA 42

TIMOTHY TINKER and ANN TINKER,
his wife,

Plaintiffs,

-vs-

CHRYSLER CORPORATION, BEAVER
DAM PRODUCTS CORPORATION formerly
known as Chrysler Marine
Corporation, et. al.

Defendants .
_____/

NOTICE OF SERVICE OF DEFENDANT'S, CHRYSLER CORPORATION, RESPONSES TO MASTER PRELIMINARY INTERROGATORIES

Defendant, **CHRYSLER CORPORATION**, through undersigned counsel hereby gives Notice of Service of its Responses to Master Preliminary Interrogatories dated June 29, 1995.

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Attorneys for Chrysler Corporation
and Beaver Dam Products Corporation

BY: _____
DAVID I. WEISS
Fla. Bar No. 656976

PLAINTIFF'S EXHIBIT
CH-67

Case No.: 95-10261 CA 42
Tinker v. Chrysler Corp., et. al.

CERTIFICATE OF SERVICE

WE HEREBY CERTIFY that a true and correct copy of the foregoing was this 2nd day of October, 1995, delivered by mail to **DAVID LIPMAN, ESQUIRE, Counsel for Plaintiff,** 5901 S.W. 74th Street, Suite 304, Miami, Florida 33143.

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OF COUNSEL
MARVIN I. WIENER, P.A.
BRIAN E. INGALLS
GREGORY J. RITTER

October 2, 1995

TO ALL COUNSEL:

RE: Tinker v. Chrysler Corporation et. al
Our File No.: 0303.8112

On this date Chrysler Corporation served its Responses to Master Preliminary Interrogatories and Request for Production. If you would like a copy of these responses, please telephone the offices of the undersigned in order to receive same.

Very truly yours,

DAVID I. WEISS

DIW/nr
Enclosures

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PRELIMINARY INTERROGATORIES

1. **Data Sources**

Please identify each person with whom you consulted or who provided information used in answering these Interrogatories on behalf of Defendant. Additionally, provide the subject matter category that each person provided information for from the following categories if appropriate:

1. Corporate History
2. Product Information
3. Warnings/Knowledge of Potential Danger/State of the Art/Testing/Medical or Scientific

Identify each person's:

A. Address;
B. Position with the Defendant;

Answer:

The responses to these interrogatories are provided with assistance of counsel for Chrysler Corporation. Mr. Kelly's position with Chrysler Corporation is Parts Marketing Manager. Mr. Kelly is available through Herzfeld & Rubin, 801 Brickell Avenue, Suite 1501, Miami, Florida 33131.

2. **Corporate Information**

Please state the following:

A. This defendant's correct corporate name;

Answer:

Chrysler Corporation

B. The state of your incorporation;

Answer:

Delaware

C. The address of your principal place of business;

Answer:

12000 Chrysler Drive
Highland Park, Michigan 48288

D. The dates and time period during which defendant held a certificate of authority to do business in the state of Florida;

Answer:

Objection, overbroad without relation to the facts set forth in the Complaint.

E. The dates and time period during which defendant regularly conducted business in Florida.

Answer:

Objection, overbroad without relation to the facts set forth in the Complaint.

3. **Corporate History**

Describe in detail Defendant's complete corporate or business history for all associated business entities that were involved, in any manner, in the sale, manufacture, distribution, and/or mining of asbestos and/or asbestos containing products, including dates of incorporation, mergers, consolidations, reincorporations, and the like. Also provide historical information regarding all predecessors, prior names, asset purchases, acquisitions or spin-offs for all associated business entities that were involved, in any manner, in the sale, manufacture, distribution, and/or mining of asbestos and/or asbestos containing products. In addition:

A. If defendant or any of its predecessors or subsidiaries at any time purchased or assumed any of the assets and/or liabilities of any corporation or entity which at any prior time engaged in the manufacturing or sale of asbestos-containing products, then please state the following as to each acquisition:

1. The name or description of each corporation, entity or assets acquired by Defendant, that entity's state of incorporation and principal place of business, its date of incorporation, and the name of Defendant at the time of acquisition;

2. The manner by which each such corporation, entity or interest therein, was acquired (e.g., merger consolidation, change of name, stock sale, transfer or purchase of assets or product line);

3. The date of each such acquisition;

4. The state in which each such acquisition was effected;

5. The state law governing each such acquisition if specified by contract and

6. How the business or financial interest in that corporation or entity ended, if it ended. (e.g. dissolved the company, sold all stock, placed subsidiary in bankruptcy, etc.)

7. List all states where entity is or was registered to do business, including the dates of registration for each state.

Answer:

Chrysler objects to this Interrogatory on the grounds that it is overbroad and not reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving the foregoing objection, Chrysler states that the current legal name under which it does business is Chrysler Corporation. Chrysler Corporation was incorporated on June 6, 1925. Chrysler Corporation is authorized to do business in every state of the United States. Chrysler Corporation has had many subsidiary corporations since 1925, none of which would have any bearing to this litigation.

4. **Asbestos Mining**

Did Defendant, prior to 1980, engage in the mining, milling and/or subsequent sale of asbestos fiber? If so, please state?

Answer:

No.

A. The date such activity began;

Not applicable.

B. The years during which such activity took place;

Not applicable.

C. If such activity was terminated;

Not applicable.

D. If such activity was terminated, the reason why;

Not applicable.

E. Within in the United States was there any geographic limitation which you claim was applicable to the sales of your asbestos (Yes or No)?

Not applicable.

F. Identify the organizational unit of Defendant so engaged.

Not applicable.

G. Type of asbestos mined.

Not applicable.

H. Managers of each mine and years of service.

Not applicable.

I. Identify sales and shipment records from each mine.

Not applicable.

5. **Asbestos/Manufacture**

Has Defendant at any time, engaged in the manufacture of any asbestos containing product which generic product type has been previously identified in exposure sheets in this circuit? If so, please state:

A. The date such activity began;

Answer:

Objection. This question is unduly burdensome, vague and overbroad and harassing and is not likely to lead to admissible evidence. Notwithstanding this objection, Chrysler understands brake linings and clutch facings have contained asbestos. From 1959 to 1988 Chrysler Corporation manufactured brake linings at a Chrysler plant in addition to purchasing brake linings from other suppliers. Chrysler never manufactured clutch facings.

B. The years during which such activity took place;

Answer:

See response to Interrogatory 5(a) above.

C. If such activity was terminated;

Answer:

See response to Interrogatory 5(a) above.

D. If such activity was terminated, the reason why;

Answer:

Chrysler discontinued manufacture of brake linings in 1988 for economic reasons and shut down a plant based upon a reduction of the work force and expenses.

E. Within in the United States was there any geographic limitation which you claim was applicable to the sales of your asbestos (Yes or No)?

Answer:

Not applicable. Chrysler did not sell asbestos

If Yes state the geographical area into which you claim your asbestos containing products were sold; and

F. Identify the organizational unit of Defendant so engaged.

Answer:

Not applicable. Chrysler did not sell asbestos.

6. **Asbestos/Sales**

Has Defendant at any time, engaged in the marketing and/or sale of any asbestos containing product which generic product type has been previously identified in exposure sheets in this circuit? If so, please state:

A. The date such activity began;

Answer:

See response to Interrogatory 5(a) above.

B. The years during which such activity took place;

Answer:

See response to Interrogatory 5(a) above.

C. If such activity was terminated;

Answer:

See response to Interrogatory 5(a) above.

D. If such activity was terminated, the reason why;

Answer:

See response to Interrogatory 5(a) above.

E. Within in the United States was there any geographic limitation which you claim was applicable to the sales of your asbestos (Yes or No)?

Answer:

See response to Interrogatory 5(a) above.

F. Identify the organizational unit of Defendant so engaged.

Answer:

See response to Interrogatory 5(a) above.

G. Identify all sales managers and the years during which they served.

Answer:

See response to Interrogatory 5(a) above.

7. **Asbestos/Distributor**

Has Defendant at any time, engaged in the marketing and/or sale of any asbestos containing product, which generic product type has been previously identified in exposure sheets in this circuit, manufactured in whole or in part by an unrelated business entity? If so, please state:

A. The name and address of the unrelated business entity;

Answer:

See response to Interrogatory 5(a) above.

B. The product's trade and/or brand name;

Answer:

See response to Interrogatory 5(a) above.

C. The years during which such activity took place;

Answer:

See response to Interrogatory 5(a) above.

D. Identify the organizational unit of Defendant, or the associated business entity so engaged.

Answer:

See response to Interrogatory 5(a) above.

E. Within the United States was there any geographic limitation which you claim was applicable to each distributor and/or wholesaler (Yes or No)?

If Yes state the geographical area which you claim was applicable to each distributor and/or wholesaler; and

Answer:

See response to Interrogatory 5(a) above.

F. Whether there was a written distributorship agreement;

Answer:

See response to Interrogatory 5(a) above.

G. Whether distributorship was exclusive;

Answer:

See response to Interrogatory 5(a) above.

H. Identify all documents pertaining to the distributor or wholesaler relationship and the custodian thereof;

Answer:

See response to Interrogatory 5(a) above.

I. The ratio of sales to distributors compared to direct sales to consumers.

Answer:

See response to Interrogatory 5(a) above.

J. List of sales records or shipments to each distributor or wholesaler.

Answer:

See response to Interrogatory 5(a) above.

8. Has Defendant at any time, engaged in the rebranding of asbestos containing products, which generic product type has been previously identified in exposure sheets in this circuit, manufactured in whole or in part by an unrelated business entity? If so, please state:

A. The name and address of the unrelated business entity;

B. The product's original trade and/or brand name;

C. Who performed the physical rebranding and where it was accomplished;

D. The years during which such activity took place;

E. Brand name and/or trade name after the product was rebranded;

F. User or seller of the product after rebranding;

G. Identify the organizational unit of Defendant so engaged.

Answer:

Objection to the Interrogatory as vague, overbroad and without reference to the allegations in the Complaint against Chrysler Corporation

Without waiving this objection, this Defendant answers as follows: Products which were manufactured by entities other than Chrysler including brake linings and clutch facing were incorporated into Chrysler vehicles. Additionally, certain parts manufactured by entities other than Chrysler, would be packaged in after-market packages for sale to authorized dealers.

9. **Asbestos/Sales to Manufacturer**

Has Defendant at any time, engaged in the sale of asbestos containing products, which generic type has been previously identified in exposure sheets in this circuit, to an unrelated business entity that was engaged in the manufacture of asbestos containing products? If so, please state:

A. The name and address of the unrelated business entity;

B. The product's trade and/or brand name that was sold;

C. The years during which such activity took place;

D. Identify the organizational unit of Defendant so engaged.

E. List each sales office of your asbestos-containing products and for each please state:

(1) Name and address;
(2) Geographical areas for which each sales office was responsible;
(3) Identify all managers and the years during which they served;
(4) Identify all sales personnel and the years during which they served, and describe each person's sales jurisdiction or responsibility;
(5) Identify sales records or shipment records for each sales office and the custodian thereof.

Answer:

Objection, overbroad burdensome and harassing. Additionally, this Interrogatory requires Chrysler Corporation to engage in a massive review of each asbestos litigation file ever initiated in the 11th Judicial Circuit, Dade County, Florida.

10. **Asbestos/Sales to Government or Government Agencies**

Did this Defendant ever sell or cause to be sold any of its asbestos containing products, identified on exposure sheets filed in this circuit, to (1) the United States Government; (2) the United States Air Force; (3) Army Air Force; (4) United States Army; (5) United States Navy; (6) United States Marine Corps; (7) General Service Administration; (8) Department of Defense; or (9) or any other agency operated by the United States Government? If so, please provide the following:

A. The names and last known address of the governmental agency;

B. Whether there was a written contract or sales agreement;

C. Identify all documents pertaining to the governmental contracts or agreements and custodian of said documents;

D. Whether the formula used for the manufacture of the product was the same as the formula used for the manufacture, sale or distribution of the product to non-governmental customers;

E. The extent to which sales to governmental agencies were handled through distributors or wholesalers as opposed to direct sales by Defendant;

F. The extent to which the physical appearance of the product sold or distributed to a governmental agency differed from the physical appearance of the product sold or distributed to non-governmental customers;

G. The extent to which the packaging and/or labeling of the product sold or distributed to a governmental agency differed from the packaging or labeling of the product sold or distributed to non-governmental customers;

H. Identify Sales and shipment records for each governmental agency and the custodian thereof.

Answer:

Objection, overbroad without reference to allegations in Plaintiff's Complaint where Plaintiff fails to allege facts indicating Timothy Tinker ever served in the military.

11. **Asbestos/Sales Through Licensees**

If any of this Defendant's asbestos-containing products which generic product type has been previously identified in exposure sheets in this circuit, reached the consumer through licensees, please provide the following:

A. The name and last known address of licensees;

B. The years each licensee was licensed to sell, distribute or manufacture this Defendant's asbestos-containing products;

C. Within the United States was there any geographic limitation which you claim was applicable to each licensee (Yes or No)?

If Yes state the geographical areas for which each licensee was permitted to sell, manufacture or distribute this Defendant's asbestos-containing products; and

D. Describe the terms and conditions of each licensee agreement entered into between this Defendant and licensee insofar as manufacture, sale, and distribution of asbestos-containing products;

E. List of products each licensee was permitted to sell or manufacture;

F. Identify all documents pertaining to the licensee relationship and the custodian thereof;

G. Whether or not sales to consumers in each area were made exclusively through licensee.

Answer:

Objection. This interrogatory is ambiguous, overbroad, harassing, over burdensome and unintelligible in the use of the word "licensees."

12. **Asbestos/Facilities**

For the period 1920 to date, or during the period that Defendant mined, manufactured, sold or distributed asbestos containing products, whichever period is less, state the following regarding each facility that was used by you as a mining, milling, manufacturing, processing, distribution or marketing facility for asbestos containing products:

A. The name and address of the building, mine, mill or facility;

B. The inclusive dates the facility was in operation; and,

C. The function of the facility (e.g., manufacturing, warehousing, mine, sales office, etc.)

D. Plant managers and years of management;

E. Name and type of asbestos-containing products manufactured or processed at each facility;

F. Identify shipment records for each facility and the custodian thereof;

G. If asbestos was mined and sold to any other entity besides this Defendant, please provide list of those entities.

Answer:

Objection. This interrogatory is overbroad, harassing, burdensome and without reference to the facts alleged in the Complaint against Chrysler Corporation.

13. **Answering Defendant's Asbestos Containing Products**

Using the format set out below, answer the following interrogatory. The main purpose of this interrogatory is to first, obtain basic information concerning asbestos-related products, which generic product type has been previously identified in exposure sheets in this circuit with which the answering defendant and its associated business entities were involved, and second, to identify the number of "Interrogatory Response Sheets" the answering defendant must complete.

Provide the following information for each asbestos-containing product, which generic product type has been previously identified in exposure sheets in this circuit, with which this answering defendant was involved:

A. The name of the associated business entity so involved;

B. The Product Trade Name of the asbestos product(s) with which the entity was involved (See the definition of "Product Trade Name" at interrogatory number 14(B));

C. The Product Trade Name of the asbestos product(s) with which the entity was involved (See the definition of "Product Trade Name" at interrogatory number 14(B);

D. Identify the inclusive years of each type of product involvement (e.g., If the entity manufactured and distributed the product, list both types of involvement and the years that correspond to such involvement);

Use the following format. Please work through all of the asbestos-containing products with which one associated business entity was involved before working through all of the asbestos-containing products with which a different associated business entity was involved.

Answer:

Chrysler Corporation objects to the interrogatory as overbroad and burdensome. Upon information, Chrysler Corporation has never been required to serve answers to standard asbestos interrogatories in the Eleventh Judicial Circuit prior to this submission. The information sought requires Chrysler Corporation to conduct a complete product historical review of its records and files as pertains to a "generic" product list proffered by Plaintiff(s). This historical review poses great prejudice and significant burden to Chrysler Corporation, an atypical defendant party in Dade County asbestos litigation. Chrysler Corporation re-adopts the objections filed by Caterpillar, Inc.'s Motion to Strike or in the Alternative Objections to Plaintiffs' Master Preliminary Interrogatories and General Motors/Detroit Diesel's Motion to Strike Plaintiffs' Second Set of Interrogatories as pertains to be information sought by Plaintiff(s), herein.

FORMAT

(Repeat this format for each product with which each associated business entity was involved)

(a) Associated Business Entity	(b) Product Trade Name	(c) Type(s) of Involvement	(d) Years of Each Type of Involvement

EXAMPLE

(a) Associated Business Entity	(b) Product Trade Name	(c) Type(s) of Involvement	(d) Years of Each Type of Involvement
Company Q	*Product E	Manufacturer	1957-1973
		Distributor	1957-1973
		Labeler	1957-1973
		Rebrander	1960-1965

(a) Associated Business Entity	(b) Product Trade Name	(c) Type(s) of Involvement	(d) Years of Each Type of Involvement
Company Q	*Product F	Rebrandee	1953-1962
		Labelee	1957-1973

(a) Associated Business Entity	(b) Product Trade Name	(c) Type(s) of Involvement	(d) Years of Each Type of Involvement
Company R	*Product E	Rebrandee	1960-1965

* Note that if different entities are involved with the same asbestos-containing products the asbestos-containing product is to be addressed in the responses of each such business entity, including the answering defendant if applicable.

14. **Product Information**

Following this page is a proposed "Interrogatory Response Sheet" and definitions, examples and instructions dealing with the completion of this *question.*

For each and ever asbestos-containing product, which generic product type has been previously identified in exposure sheets in this circuit, with which you were involved, as previously identified in responding to the previous interrogatory, please answer the following.

A separate response is to be provided to this question for each and every asbestos-containing product with which the responding defendant was involved.

If different entities were involved with the same asbestos-containing products the asbestos-containing product is to be addressed in a response to this question for each such business entity, including the answering defendant if applicable.

*For example if pipe covering is a generic product type that has been previously identified in exposure sheets filed in this circuit, then the answering defendant is to provide information regarding all types of pipe covering manufactured, sold and/or distributed by defendant regardless of whether a specific types of pipe covering /manufactured, distributed and/or sold by defendant has been identified in exposure sheets in prior litigation in this circuit. In contrast if ironing board covers are a product that have not been identified in exposure sheets filed in this circuit then the defendant need not provide information regarding this product type.

Answer:

Chrysler Corporation objects to the interrogatory as overbroad and burdensome. Upon information, Chrysler Corporation has never been required to serve answers to standard asbestos interrogatories in the Eleventh Judicial Circuit prior to this submission. The information sought requires Chrysler Corporation to conduct a complete product historical review of its records and files as pertains to a "generic" product list proffered by Plaintiff(s). This historical review poses great prejudice and significant burden to Chrysler Corporation, an atypical defendant party in Dade County asbestos litigation. Chrysler Corporation re-adopts the objections filed by Caterpillar, Inc.'s Motion to Strike or in the Alternative Objections to Plaintiffs' Master Preliminary Interrogatories and General Motors/Detroit Diesel's Motion to Strike Plaintiffs' Second Set of Interrogatories as pertains to be information sought by Plaintiff(s), herein.

INTERROGATORY RESPONSE SHEET

A. Associated Business Entity _____

B. Product Trade Name _____

C. Product Generic Name _____

D. Generic Product Type _____

E. Product Involvement(s) _____

F. (1) Approximate Asbestos Content By Weight _____ to _____

Type of Asbestos by % _____

(2) Approximate Asbestos Content By Volume _____ to _____

Type of Asbestos by % _____

G. Product Years ____|____ ____|____ ____|____ ____|____

H. Intended Uses _____

I. Manufacturing Sites _____|_____

_____|_____

_____|_____

_____|_____

_____|_____

J. Sizes _____ to _____

K. Product Color(s) ____|____ ____|____ ____|____ ____|____

L. Product Packaging _____ _____ _____ _____

M. Geographic Limitation (Yes/No)? ___

If Yes, Shipments:

Shipments:

Northeast ___ MA ___ NH ___ ME ___ NY ___ VT ___ RI ___ CT

Mideast ___ OH ___ VA ___ WV ___ KY

Southeast ___ FL ___ NC ___ SC ___ TN ___ AL ___ GA ___ MS

Southwest ___ TX ___ CO ___ NM ___ UT ___ AR ___ AZ ___ LA ___ OK

Midwest ___ MI ___ IL ___ IN ___ MO ___ WI ___ MN ___ ND ___ SD ___ WY ___ NB ___ KA ___ IA

West ___ CA ___ NV ___ OR ___ ID ___ WA ___ MT ___ HI ___ AK

East ___ PA ___ DE ___ NJ ___ MD ___ DC

Other ___ VI ___ GU ___ PR

N. Product Literature _____

O. Product Picture(s) _____

P. Package Picture(s) _____

Q. Product Sample _____

R. Trademark Name(s) _____ _____

S. Patent Number(s) _____ _____

T. Product Alteration _____

A. **Associated Business Entity** _____

Definition:

The name of the business entity as identified in the previous Interrogatory that had any involvement (as defined in Subpart E) with the asbestos-containing product.

Example:

Associated Business Entity	The Ruberiod Co.
Associated Business Entity	Baldwin-Hill Company
Associated Business Entity	None

Instructions:

Complete this interrogatory with the name of an Associated Business Entity that corresponds to this product as disclosed in the previous Interrogatory. Where the answering defendant, rather than an Associated Business Entity, was involved with this asbestos-containing product, type "none" on this line.

B. **Product Trade Name** _____

Definition:

The full name of the asbestos-containing product by which it was marketed. Generally, this would be the name of the product as it appeared on the product, its packaging or its promotional material. Where all, or part of the product name is trademarked, the name should be included in the product trade name.

Instructions:

Where a product trade name represents more than one product, or a line of products, complete separate "interrogatory Response Sheets" for each such product to the extent reasonable and necessary so as to provide as much information as possible regarding each such product or product line. Where information concerning more than one product or a product line is condensed on one "Interrogatory Response Sheet," explain, on a separate sheet of paper why you did so.

Examples:

Product Trade Name BEH Super Powerhouse Cement
Product Trade Name Gold Bond Asbestone Economy 250
Product Trade Name K-Fac Insulation Blocks
Product Trade Name Armstrong Accobest AS-8073
Product Trade Name Armstrong Accobest AS-474

Further Instructions:

Where the product name is "generic," that is, it does not have a trade name by which it was sold, then list the product's generic name but preface the generic name with the name of the entity most closely associated with that generic. The entity most closely associated with that product would be the entity's name that would appear with the product, product package, or product promotional literature.

If no such association exists, then the name of the /manufacturer of that generic product should be used.

Further Examples:

Product Trade Name Ruberoid Asphalt Saturated Asbestos Weatherproof Jacket

Product Trade Name Amatex Asbestos Woven Tape
Product Trade Name Armstrong Perforated Asbestos Board
Product Trade Name Celotex Perforated Asbestos Board

C. **Product Generic Name** _____

Definition:

The name by which this type or species of product was routinely called. Generally, this name would be the generic name of a product (without the name of the entity most closely associated with that generic product).

Examples:

Product Trade Name Careystone Asbestos-Cement Siding
Product Generic Name Asbestos Cement Siding

Product Trade Name Gold Bond Asbestone Economy 250
Product Generic Name Corrugated Siding and Roofing

Product Trade Name K-Fac Insulation Block
Product Generic Name Insulation Block

Product Trade Name Armstrong Perforated Asbestos Board
Product Generic Name Perforated Asbestos Board

D. **Generic Product Type** _____

Definition:

Product Generic Name Insulating Cement
Product Category Cement

Product Generic Name Corrugated Siding and Roofing
Product Category Roofing/Siding

Product Generic Name Hi-temp Block
Product Category Block

Product Generic Name Perforated Asbestos Board
Product Category Board

Further Instructions:

To the extent reasonable, the following categories of products should be used. Where a product fits as readily in one category as another (e.g., corrugated siding and roofing), both categories can be listed as is shown above.

CATEGORIES				
Adhesives	Cement Sheets	Friction	Paper	Talc
Automotive Brake	Cement Shingles	Gaskets	Pipe Covering	Tape
Automotive Clutch	Cloth	Home Use	Plaster	Textiles
Block	Clothing	Hot tops	Refractory	Wallboard
Board	Cord	Lumber	Rollboard	Wall Covering
Boiler Cement	Cork Products	Millboard	Roofing	Wick
Cable	Electrical Products	Non Automotive Brake	Rope	Wire
Cement	Felts	Non Automotive Clutch	Siding	
Cement Board	Fiber	Packing	Spray Materials	
Cement Pipe	Floor Tile	Paint	Speckling	

If none of the above categories are appropriate, note "other" and use your own words to describe the category of product.

E. **Product Involvement(s)** _____

Definition:

Any involvement, association, or relationship you had with an asbestos-containing product as a miner of asbestos, manufacturer of an asbestos-containing product, seller of an asbestos-containing product, distributor of an asbestos-containing product, rebrander of an asbestos-containing product, rebrandee of an asbestos-containing product, labeler of an asbestos-containing product, labelee of an asbestos-containing product, *or some other relationship.*

Further Definitions:

A miner of an asbestos-containing product is any entity that takes asbestos from the earth for commercial sale or distribution.

A manufacturer of an asbestos-containing product is any entity that manufactures any product that incorporate asbestos into that product, or who in any way processes or packages asbestos or an asbestos-containing product.

A distributor of an asbestos-containing product is any entity who ships or in any way directs shipments of an asbestos-containing product.

A rebrander of an asbestos-containing product is any entity that manufacturers process, or packages asbestos or an asbestos-containing product but which places the name of another entity or the name of a product with which another entity is involved on that product or product package.

A rebrandee of an asbestos-containing product is any entity for which asbestos or an asbestos-containing product is manufactured, processed, or packaged by another entity, which other entity places the name of the rebrandee or the name of a product with which the rebrandee is involved *on the product or product package.*

A labeler of asbestos or an asbestos-containing product is any entity that places its business name anywhere on an asbestos-containing product or package that it manufactures, distributes, sells or rebrands for itself or any entity.

A labelee of asbestos or an asbestos-containing product is any entity for who its business name is placed anywhere on an asbestos-containing product or package that is manufactured, sold, or rebranded by any entity.

Some other association or relationship with an asbestos-containing product other than as a miner, manufacturer, distributor, rebrander, rebrandee, labeler or labelee.

Instructions:

For each asbestos-containing product with which you were in any way involved, indicate the type or types of relationships you had at any time with that product, noting on line E the code or codes for such relationship. These involvements should be the same as were listed in the previous interrogatory.

Use the following codes:

Miner (Mr)	Rebrander (Rr)	Labeler (Lr)	Distributor (Dr)
Manufacturer (Mf)	Rebrandee (Re)	Labelee (Le)	Other (To)

Examples:

Product Involvements Mf Rf Lr Dr
Product Involvements Dr

F. (1) Approximate Asbestos Content by Weight _____ to _____

Type of Asbestos by % _____

Definition:

The usual weight of the asbestos in the product divided by the total weight of the product expressed as a percent. Additionally, provide a listing of all types of asbestos, including contaminants found in the product, as supplied to end users and for each type provide the percentage by weight of each type per unit of product.

Instructions:

Where the asbestos content has varied to any significant degree over time in a particular product, indicate the range of asbestos content in the appropriate section of the answer. If little change occurred over time, write "N/A" in those sections.

In the first part of the answer, whether or not the asbestos content varied, indicate what you believe would be the usual, most representative content over time. In the second part of the answer, note the range of asbestos content over time.

When stating the percent of asbestos by weight, exclude any water added as part of the formulation and in application of the product.

Use the following two letter codes when responding to this interrogatory:?

- **Cv** for *crysotile*
- **Am** for amosite
- **Cr** for crocidolite
- **Tr** for tremolite
- **To** for any other type of asbestos
- **N/A** for not applicable

Example:

Approximate Asbestos Content by weight 10% | N/A to N/A
Approximate Asbestos Content by weight 10% | 3% to 12%

Type of Asbestos by % Cv - 10%, Tr - 1%

(2) Appropriate Asbestos Content by Volume ____|____ to _____

Type of Asbestos by % _____

Definition:

The usual volume of the asbestos in the product divided by the total volume of

the product expressed as a percent. Additionally, provide a listing of all types of asbestos, including contaminants found in the product as supplied to end users and for each type provide the percentage by volume of each type per unit of product.

G. **Product Years** _____ _____ _____ _____

Definition:

Inclusive dates of all types of involvement with the asbestos-containing product, expressed in years.

Instructions:

Indicate in the first half of the space, the year you, or the relevant associated business entity first became involved with the asbestos-containing product. On the second half of the space, indicate the last year of involvement with that asbestos-containing product.

If the involvement with the asbestos-containing product was not continuous through all years, use the additional spaces provided to represent such years of involvement.

If the involvement with an asbestos-containing product lasted for only one year or part of one year, note the same year in both halves of the space. If the involvement continues to this time, note "P" for present in the appropriate space.

Type: N/A | N/A (not applicable) on any unused spaces.

Example:

Product Years	1948 | 1972	1975 | 1975	N/A | N/A	N/A | N/A
Product Years	1936 | 1953	1955 | 1963	1966 | 1970	1972| P

H. **Intended Uses** _____

Definition:

Provide any limitations on the intended use of the product, including the temperature ranges for which the product was recommended.

H. **Intended Uses** _____

Definition:

Provide any limitations on the intended use of the product, including the temperature ranges for which the product was recommended.

I. Manufacturing Sites: _____ _____

_____ _____

Definition:

All locations and time periods at and during which the product was manufactured during your involvement with the product.

Instructions:

On the first half of the line indicate the city and state, or city and province or the like, at which the product was manufactured.

On the second half of the line, indicate the inclusive years of manufacture.

Example:

Manufacturing Sites	Norfolk, VA | 1940-1970
Manufacturing Sites	Milwaukee, WI | 1962-1969 Peoria, IL | 1967-1973
Manufacturing Sites	Glendale, IL | 1967-1970 Glendale, IL | 1972 1976
Manufacturing Sites	Conrad, UT | 1936-1942 Ida, IL | 1942-1950 Ida, IL | 1952-1969

J. **Sizes** _____ to _____

Definition:

The generally produced sizes and shapes of the product as sold to the end user, noting the smallest to the largest standard sizes. Respond additionally to this interrogatory by providing information as to the packaging of the product when providing information regarding the product's size. (e.g. 25-75 lb. bags of cement, etc.)

Instructions:

In completing this information, note the smallest standard sizes or weights first, then the largest standard sizes or weights.

Use the following abbreviations as appropriate.

- "C" for circumference
- "D" for diameter
- "G" for gauge
- "H" for height
- "L" for length
- "P" for pounds
- "T" for thickness
- "W" for width

If the suggested abbreviations are inappropriate, type out the most useful size or weight description on the spaces provided or on a separate sheet of paper, identifying that entry as "Interrogatory Response (14)(J), Sizes" and attach that sheet to the Interrogatory Response Sheet.

Examples:

Sizes D2", L12", T1/2" to D24", L48", T2"
Sizes 10 P sacks to 100 P sacks

K. **Product Color(s)** ___|___ ___|___ ___|___ ___|___

Definition:

The basic color(s) of the product. Where the product line had the same basic product in a variety of colors, the five most popular colors or color combinations.

Instructions:

A piece of product may be single-colored or multi-colored. Different pieces of the same product may be designed to show different colors (e.g., floor tile) or the color may have changed from time to time. The above lines are to be completed as follows:

- If the product was the one color, complete the first half of the first line only. Note: "N/A" on the second half of the lines, and N/A | N/A on all other lines.

- If the product was one color, but that color changed from time to time, complete the first half of as many lines as there were color changes (up to five). Note: "N/A" on the second half of the lines, and N/A | N/A on all other lines.

- If the product line included multi-colored pieces indicate the two most prominent colors by using both sides of the line. Up to five multi-colored products can be noted.

- If there were more than five colors or five color combinations, note the most frequently made color(s).

- Try to limit your responses by using the following colors. Use the two-letter codes provided. Generally, do not separately identify shades of the same color. If the following colors are inadequate to describe a product color, type in what you believe is the proper color name(s).

- Gray (Gy)	- Blue (Bl)	- Brown (Br)
- Black (Bk)	- Violet (Vt)	- Yellow (Yw)
- White (Wh)	- Green (Gr)	- Orange (Or)
- Red (Rd)	- Pink (Pk)	- Tan (Tn)

Example:

Product Color(s)	Gy|N/A Bk|N/A Wh|N/A N/A|N/A N/A|N/A
Product Color(s)	Gy|Bk Bk|N/A N/A|N/A N/A|N/A N/A|N/A
Product Color(s)	Wh|Rd Wh|Bk Wh|Bl Wh|Yw Wh|Or

L. **Product Packaging** _____

Definition:

The most frequently used containers in which the product was packaged.

Instructions:

To the extent possible, use the following codes as set forth below in responding to this interrogatory. Where no code is applicable, type the kind of container or packaging. Provide up to five types of containers, listing where known, the most frequently used container first, second most frequently used container, next, etc. Type N/A on any unused line.

Cardboard box (CB)	Metal drum (MD)	Burlap sack (BS)
Wooden box (WB)	Cardboard drum (CD)	Cloth sack (CS)
Plastic box (PB)	Plastic drum (PD)	Paper sack (PS)
Other box (OB)	Other drum (OD)	Plastic sack (KS)
Bound bundles (BB)	Pallets (PT)	Other sack (OS)
Wooden spools (WL)	Paper spools (PL)	Plastic spools (PL)
Other spools (OL)		

Example:

Product Packaging	CB	WB	N/A	N/A	N/A	
Product Packaging	CD	N/A	N/A	N/A	N/A	
Product Packaging	CS	KS	PS	OS	N/A	N/A

M. Within the United States was there any geographic limitation which you claim was applicable to the sale of this product (Yes or No)?

Geographic Limitation (Yes/No)? _____

If Yes, state the geographical area which you claim was applicable to this product.

Shipments:

Northeast	MA	NH	ME	NY	VT	RI	CT					
Mideast	OH	VA	WV	KY								
Southeast	FL	NC	SC	TN	AL	GA	MS					
Southwest	TX	CO	NM	UT	AR	AZ	LA	OK				
Midwest	MI	IL	IN	MO	WI	MN	ND	SD	WY	NB	KA	IA
West	CA	NV	OR	ID	WA	MT	HI	AK				
East	PA	DE	NJ	MD	DC							
Other	VI	GU	PR									

Definition:

Identify those states, possessions, etc. to which your product was ever shipped, was never shipped or it is unknown to you as to whether your product was ever shipped there, if you claim a geographical limitation.

Instructions:

Identify those areas to which you know any product was ever shipped by marking an X on the appropriate line for that state, territory, etc.

Identify those areas to which you know any product was never shipped by marking an O on the appropriate line for that state, territory, etc.

Identify those areas about which you have no information as to whether any product was ever shipped by marking a "?" on the appropriate line for that state, territory, etc.

"Other" means any geographical area not identified by the prior abbreviations.

Example:

Shipments:

Northeast	X	X	X	X	X	X	X					
	MA	NH	ME	NY	VT	RI	CT					
Mideast	X	X	X	X								
	OH	VA	WV	KY								
Southeast	X	X	X	X	X	X	X					
	FL	NC	SC	TN	AL	GA	MS					
Southwest	X	X	X	X	X	X	?	X				
	TX	CO	NM	UT	AR	AZ	LA	OK				
Midwest	O	O	O	O	?	?	?	?	O	O	O	O
	MI	IL	IN	MO	WI	MN	ND	SD	WY	NB	KA	A
West	O	O	O	O	O	O	?	?				
	CA	NV	OR	ID	WA	MT	HI	AK				
East	X	X	X	X	?							
	PA	DE	NJ	MD	DC							
Other	O	O	O	X								
	VI	GU	PR	OTHER								

N. **Product Literature** _____

Definition:

Whether or not you have any product literature of any sort (e.g., promotional literature, ads, catalogue entries, books, etc.) that describes or pictures this product, yes or no.

Examples:

Product Literature Yes

Product Literature No

O. **Product Picture(s)** _____

Definition:

Whether or not you have care, custody or control over any depictions of this product, and if so, the type of depiction(s).

Instructions:

If you have no depictions of this product, answer "no" in the space provided.

If you do have depictions of this product, indicate the types of depictions you have. Use the following codes and indicate for each type of depiction whether it is a:

- Color Picture (CP)
- Color Sketch (CS)
- Black & White Sketch (BS)
- Blueprint (BT)
- Black & White Picture (BW)
- Photocopy (PC)
- Other (TO)

Examples:

Product Picture(s) No

Product Picture(s) BT

Product Picture(s) CP BT BW PC TO

P. **Package Picture(s)** _____

Definition:

Whether or not you have any depictions of the product packaging and if so, the type of depictions.

Instructions:

If you have no depictions of this product, answer "no" in the space provided.

If you do have depictions of this product, indicate the types of depictions you have. Use the following codes and indicate for each type of depiction whether it is a:

- Color Picture (CP)
- Black & White Picture (BW)
- Color Sketch (CS)
- Photocopy (PC)
- Black & White Sketch (BS)
- Other (TO)
- Blueprint (BT)

Examples:

Product Picture(s) No

Product Picture(s) BT

Product Picture(s) CP BT BW PC TO

Q. **Product Sample** _____

Definition:

Whether or not you have one or more samples of the asbestos-containing products, yes or no.

Example:

Product Sample Yes
Product Sample No

R. **Trademark Name(s)** _____ _____

Definition:

The name of any trademark(s) in any way associated with the product, product packaging, or product literature.

Instructions:

If more than one Trademark is associated with the name of a product (e.g., Gold Bond Ripple-Tone Panels), provide the requested information for each trademark.

Type N/A on any unused lines.

Examples:

Trademark Name(s) Perf-A-Tape N/A

Trademark Name(s) Gold Bond Ripple Tone

S. **Patent Number(s)** _____ _____

Definition:

The Patent Number(s) of any product or process in any way related to the product itself.

Instructions:

To the extent more than one patent is involved with the product itself, or the manufacture, sale, processing, development, etc. of the product, note the additional patent number on the additional line provided.

Type N/A on any unused lines.

Examples:

Patent Number(s) 3.660.148 N/A

Patent Number(s) 2.573.659 2.529.175

T. **Product Alteration** _____

Definition:

State whether the product has been altered in chemical composition since first being made. If so, please state as to each such alteration:

i. The date of the alteration;

ii. The nature of the alteration;

iii. The reason for the alteration;

iv. Identify the person(s) recommending or approving such alteration; and

v. Whether there are any studies, evaluations or tests made in connection with the alteration, and if so, identify each such study.

15. **Asbestos Free Products**

For each asbestos containing product whose trade name is listed in Answer No. 14, state:

A. Was the product, or a substitute for that product, ever manufactured and/or sold by you without asbestos; if so, when did the sale of the product commence;

B. Brand name of the asbestos free product;

C. The reason product was manufactured without asbestos;

D. Was the asbestos-containing counterpart of said product sold while the asbestos-free counterpart was being manufactured; if so, provide the time periods;

Answer:

Chrysler Corporation objects to the interrogatory as overbroad and burdensome. Upon information, Chrysler Corporation has never been required to serve answers to standard asbestos interrogatories in the Eleventh Judicial Circuit prior to this submission. The information sought requires Chrysler Corporation to conduct a complete product historical review of its records and files as pertains to a "generic" product list proffered by Plaintiff(s). This historical review poses great prejudice and significant burden to Chrysler Corporation, an atypical defendant party in Dade County asbestos litigation. Chrysler Corporation re-adopts the objections filed by Caterpillar, Inc.'s Motion to Strike or in the Alternative Objections to Plaintiffs' Master Preliminary Interrogatories and General Motors/Detroit Diesel's Motion to Strike Plaintiffs' Second Set of Interrogatories as pertains to be information sought by Plaintiff(s), herein.

16. **Product Development/Design**

For each asbestos product referred to in Answer No. 14, or which was sold to any other defendant, state separately:

A. Was the product manufactured or sold to any entity prior to its being placed on the commercial market;

B. The date and place where the product was designed and developed;

C. The identity and last known address of the person or persons responsible for the design or development of the product;

D. Was she product ever tested prior to its being sold for use by the consumer? If so, provide the identity and present location of all records dealing with these tests (including testing concerning use, application, durability, toxicity, etc.) and the custodian of said records.

Answer:

Chrysler Corporation objects to the interrogatory as overbroad and burdensome. Upon information, Chrysler Corporation has never been required to serve answers to standard asbestos interrogatories in the Eleventh Judicial Circuit prior to this submission. The information sought requires Chrysler Corporation to conduct a complete product historical review of its records and files as pertains to a "generic" product list proffered by Plaintiff(s). This historical review poses great prejudice and significant burden to Chrysler Corporation, an atypical defendant party in Dade County asbestos litigation. Chrysler Corporation re-adopts the objections filed by Caterpillar, Inc.'s Motion to Strike or in the Alternative Objections to Plaintiffs' Master Preliminary Interrogatories and General Motors/Detroit Diesel's Motion to Strike Plaintiffs' Second Set of Interrogatories as pertains to be information sought by Plaintiff(s), herein.

17. **Sales Documents**

Please state whether you have any documents of any kind indicating or reflecting past sales of one or more asbestos-containing products listed in response to interrogatory 14, including, but not limited to, invoices, orders, purchase records, sales records, confirmations, bills of lading, annual or other periodic summaries of sales or orders, accounts payable or accounts receivable records, etc. If so, describe in detail the different types of documents that you have for each such asbestos-containing product, and state the following as to each type of document:

A. The items of information contained on it (e.g., date of sale, product, quantity, purchaser, shipment location, price, etc.);

B. The years of sale encompassed by documents still in existence;

C. The current location of the documents;

D. Identify the current custodian of the documents, as well as the current employee most familiar with the codes or system used on the documents.

Answer:

Chrysler Corporation objects to the interrogatory as overbroad and burdensome. Upon information, Chrysler Corporation has never been required to serve answers to standard asbestos interrogatories in the Eleventh Judicial Circuit prior to this submission. The information sought requires Chrysler Corporation to conduct a complete product historical review of its records and files as pertains to a "generic" product list proffered by Plaintiff(s). This historical review poses great prejudice and significant burden to Chrysler Corporation, an atypical defendant party in Dade County asbestos litigation. Chrysler Corporation re-adopts the objections filed by Caterpillar, Inc.'s Motion to Strike or in the Alternative Objections to Plaintiffs' Master Preliminary Interrogatories and General Motors/Detroit Diesel's Motion to Strike Plaintiffs' Second Set of Interrogatories as pertains to be information sought by Plaintiff(s), herein.

18. **Sales Office**

Did you ever have any sales offices in Florida that were responsible for distribution and/or sales of asbestos and/or asbestos containing products listed in responding to interrogatory 14? If so, please state as to each such sales office;

A. Its address and years of operation;

B. Identify all managers from 1930 through the present and the years during which they were served;

Answer:

Objection. This interrogatory is overbroad without reference to the allegations against Chrysler Corporation. Without waiving said objections, Chrysler Corporation has submitted to the personal jurisdiction of this Court with regard to this litigation.

19. **Fiber Purchases**

Please state the name and address of each business entity from whom the Defendant, Defendant's predecessors, Defendant's subsidiaries have ever bought or received raw asbestos fiber.

Answer:

Chrysler did not design and/or develop all brake linings that it sold from 1959 to 1988. In addition to manufacturing brake linings, Chrysler purchased brake linings from other manufacturers. Subject to and without waiving the foregoing objections, Chrysler manufactured brake linings starting 1959. Chrysler also purchased brake linings from the following manufacturers during the years indicated:

1958 - 1961	Johns-Manville ABEX
1962	Bendix (Allied Signal Corp.) Johns-Manville
1963-1964	Bendix (Allied Signal Corp.)
1965-1968	Johns-Manville ABEX Bendix (Allied Signal Corp.)

20. **Insurance**

For all policies of insurance affording general liability or product liability coverage, including primary policies, excess policies, policies of reinsurance, program of self-insured retention (SIR) and/or policies in which defendant was additionally insured, applicable to injuries allegedly caused by exposure to asbestos and/or asbestos containing products state:

A.	Insurer:	Specify exactly as named in the insurance policy or other evidentiary document coverage.
B.	Insured:	The insured named in the policy.
C.	Policy Period:	Refer to the actual period for which the insurance policy is and/or was in effect.
D.	Policy Type:	Specify whether primary, excess or self-insured, etc.
E.	Per Occurrence/ Accident Limits:	Refer to the limit for any one occurrence or any one accident.
F.	Products Aggregate:	Refer to the aggregate limit applicable to products bodily injury liability coverage. Certain insurance policies may contain combined aggregate for bodily injury, property damage and other covered perils; if so, refer to the combined limit and so indicate.
G.	Products Aggregate Consumption:	The function of the Aggregate Consumption Summary is to track the consumption of total products liability aggregate limits claims. List such consumption. If applicable the date upon which the policy limits were paid out in full or exhausted.
H.	Policy Number:	Specify exactly as contained on the insurance policy or other evidential document of coverage the policy number. Additionally provide the custodian of the policy and/or document.
I.	Insurer Objection:	Specify the bases upon which the relevant insurer refuses to fully pay claims upon demand. If the insurer has not objected to payment or is paying, note N/A.

Answer:

Objection. The Interrogatory is overbroad and without reference to facts set forth in Plaintiff's Complaint. Without waiving its objection, Chrysler Corporation is presently self-insured and has been for years. These may however be certain concurrent coverage with Hartford Insurance Company. Chrysler has been self-insured by the Hartford Insurance Company from 1926 until 1971. There were separate policies each year. From 1972 to the present, Chrysler is largely self-insured.

21. **Asbestos Consultant**

Has any person ever served as a consultant (excluding experts retained during the time of litigation), full or part-time, to defendant in any manner regarding the potential medical, toxicological, or industrial hygiene aspects of asbestos or any asbestos containing product? (the term consultant is meant to include any specialist in the above areas who was at least in part retained for his expertise and opinions in other than a full-time salaried position). If so, please state the following as to each such person;

A. Identify the person;

B. The beginning date, ending date, and period of service for the person;

C. The job duties and/or responsibilities for the person, as well as a summary of the work performed;

D. The plant address, office address, or duty assignment location for the person for each part of the consultancy;

E. The reason for retaining the person;

F. Identify the company official responsible for retaining the person, as well as identify the company officials with whom the person met during the period of the employment of consultancy; and,

G. State whether the documents relating to the employment or consultancy in any way, including contracts, correspondence, publications, reports, status reports, studies, etc., exist and whether or not said documents mention asbestos. Additionally if said documents exist provide the name of the records custodian of said documents.

Answer:

Objection. This Interrogatory is overbroad, burdensome and without reference to the facts set forth in Plaintiff's Complaint. Without waiving its objection, Chrysler states as follows: Chrysler has retained an industrial hygienist since the mid 1930's. The industrial hygienist was hired since Chrysler felt it was necessary to establish an industrial hygiene department. The industrial hygiene department is located in Highland Park. Presently the industrial hygiene department reports to the manager of occupational safety, health and worker's compensation.

22. **Physician/Consultant**

Please state whether or not Defendant ever employed, engaged or retaining any physician as a consultant, plant physician or otherwise (excluding experts retained during the course of litigation), in connection with asbestos-related business activities. If so, please state the following as to each such physician.

A. Identify the physician and give complete dates and places of employment or service;

B. State the physician's duties and responsibilities;

C. Identify the company person to whom the physician reported;

D. State the purpose for which the physician was employed, engaged or retained; and ,

E. State whether documents pertaining to the physician's professional activities involving asbestos and/or individuals exposed to asbestos exist and the custodian of said documents.

Answer:

Objection. This Interrogatory is overbroad, vague and without reference to the facts set forth in Plaintiff's Complaint. The term "physician as a consultant" is not defined.

23. **Safety Consultant**

Please state whether or not any industrial hygienist, toxicologist, safety director, occupational medical director, physician or consultant in any of the foregoing areas previously identified (excluding experts retained during the course of litigation), ever made at any time any statements, recommendations and/or suggestions to the Defendant pertaining to or relating to asbestos or health hazards from dust or any product. If so, state the following as to each such occasion;

A. Identify who made the recommendation and/or suggestion;

B. State the date of the recommendation and/or suggestion;

C. Identify all company officials who receive the recommendation and/or suggestion;

D. State the substance of the recommendation and/or suggestion; and,

E. State whether any documents and/or records of oral conversations embodying or pertaining to the recommendation and/or suggestion exist and if so the custodian of said records.

Answer:

Objection. This Interrogatory is overbroad, vague and without reference to the facts set forth in Plaintiff's Complaint. The term "physician as a consultant" is not defined.

24. **Tests/Asbestos**

Please state whether Defendant ever conducted or caused to be conducted any tests (whether laboratory or field tests) on any of their or anyone else's asbestos-containing products, including measurements of exposure levels during installation, removal and/or after installation after they had degenerated or decomposed from use, to determine potential or likely asbestos exposure levels during conditions of intended use of the product. If so, please state the following as to each such test;

A. Identify the person who directed that the test and/or measurement be made and/or conducted;

B. Identify the person or organization who conducted the test and/or measurement;

C. Identify where, when and for how long the test and/or measurement was conducted, including the department of the plant or facility involved, as well as its owner and operator;

D. State the product(s) tested and describe the conditions of the test, including the measurement methodology;

E. Describe whatever efforts, if any, were used in the test to simulate the various conditions of possible or probable use of the product, such as in confined spaces or tunnels;

F. State the asbestos exposure levels measured including the ranges measured, median measurement and average measurement;

G. Identify to whom the test results were reported; and,

H. Identify all documents pertaining to the test and the custodian thereof.

Answer:

Objection. This Interrogatory is vague, ambiguous and overbroad. Notwithstanding this objection based on available corporate records, Chrysler Corporation has not done direct testing.

25. **Financial Support/Measurement/Tests**

Has Defendant ever conducted, caused to be conducted or financially supported through at least a 10% contribution toward s the total cost, any asbestos-related epidemoiolic, toxicologic, animal, medical, scientific tests, reviews, investigations, analysis, research or studies of any king (hereinafter termed "studies")? If so, please state as to each such study:

A. Identify who directed or authorized that the study be done;

B. Identify the person or organization that conducted the study;

C. State the dates and over what time period the study was done;

D. Describe the study design and protocol;

E. State the complete results of the study, including any conclusions or recommendations contained therein;

F. Identify all company officials who received notice of the existence of the study and/or its results;

G. Identify all documents relating to the study and the custodian thereof; and

H. State whether the study was ever published, and if so, state the study title and citation.

Answer:

See Answer to Interrogatory Number 24.

26. **Literature Review**

Has Defendant ever conducted, caused to be conducted, or financed through at least a 10% contribution towards the total cost, any effort to monitor or review the professional literature regarding the clinical, epidemiologic, toxicologic, industrial hygiene, medical and/or scientific aspects of asbestos and/or products containing asbestos (excluding for the purposes of litigation)? If so, please state the following as to each effort:

A. Identify who directed or authorized that the effort be done;

B. Identify the person or organization that conducted the effort;

C. State the dates and over what time period the effort was done;

D. Describe the effort design and protocol;

E. State the complete results of the effort, including any conclusions or recommendations contained therein;

F. Identify all company officials who received notice of the existence of the effort and/or its results;

G. Identify all documents relating to the effort and the custodian thereof; and,

H. State whether the effort was ever published, and if so, state the effort title and citation.

Answer:

Objection. Objection to this Interrogatory on the ground that it is vague, irrelevant, overbroad not properly limited as to time. Subject to and without waiving the foregoing objection, Chrysler Corporation states that it has not undertaken or financed such studies.

27. **Specific Studies/Participation**

Did Defendant at any time in any way participate in any of Metropolitan Life Insurance Company's studies of asbestos (conducted approximately between 1929-1940), any Trudeau Foundation/Saranac Lake studies (between 1929-1960), or any Industrial Hygiene Foundation studies (between 1938-1968)? If so, identify each such study in which you were involved and state as to each:

A. What role or action you took in regard to the study;

B. Identify all documents related to your involvement in the study and the custodian thereof;

C. Identify each of your facilities in which any part of the study was conducted and reference your facility to the data reported in the study; and,

D. Identify each of your officers, supervisors, managers or employees who assisted, participated in or directed your involvement in the study.

Answer:

See Answer to Interrogatory Number 26.

28. **Asbestos Hazard/Notice**

Did Defendant at any time prior to 1980 receive, have notice of, acquire or possess any advice, publication, statement, warning, order, directive, letter, memorandum, recommendation or document, written or oral, in any way related to asbestos and health hazards, or which implicitly or explicitly refers to asbestos and health issues. If so, state the following as to each such document and oral conversation, and each such occasion prior to 1980:

A. When any of this knowledge was first acquired, how it was acquired, identify by whom it was acquired, and state the substance of the knowledge acquired.

B. Identify all documents pertaining to the advice, publication, statement, warning, order, directive, letter, memorandum, or recommendation and the custodian thereof;

C. Identify all company officials and directors who received notice of the existence of the document or oral conversation. For each such oral conversation state the approximate date of said conversation and the parties to said conversation; and,

D. What action, if any, was taken by you as a consequence of the document or oral conversation.

Answer:

Objection. Chrysler Corporation objects to this Interrogatory as overbroad, burdensome and calls for a scientific and/or medical conclusion that Chrysler is not available to provide. This interrogatory improperly assumes that there is or might be adverse health effects associated with the use of chrysotile asbestos. Consequentially, answering Defendant cannot respond to the interrogatory in its present form. Additionally, the interrogatory is designed to elicit a response that maybe used in a misleading manner at the time of trial rather than the discovery factual information. Chrysler does not acknowledge a causal relationship between exposure to brake dust or clutch facing dust and any diseased illness. Chrysler was, however, aware in the 1930's that certain types of raw asbestos could cause pulmonary disease when inhaled in large quantities. Notably, chrysotile asbestos used in friction products is a different type of asbestos than the types involved in insulation products.

29. **Knowledge/Asbestosis**

Please state whether Defendant obtained, prior to 1980, any knowledge concerning the association, if any, between the inhalation of asbestos fibers and a lung disease known as asbestosis, in users, consumers and/or persons exposed to asbestos and/or asbestos containing products. If so, please state:

A. When any of this knowledge was first acquired, how it was acquired, identify by whom it was acquired, and state the substance of the knowledge acquired;

B. As to each such occasion thereafter in which your knowledge as to asbestosis increased either relative to the types of exposures (i.e. trades and occupations, etc.) and/or types of products which became associated with the development of asbestosis state:

(1) when was this additional knowledge acquired;

(2) how was this additional knowledge acquired;

(3) identify by whom it was acquired;

(4) state the substance of the additional knowledge acquired;

C. Identify all documents relevant to your acquisition of knowledge concerning the disease asbestosis and the custodian thereof; and,

D. If any of the foregoing knowledge was acquired through an oral conversation, identify each such oral conversation, the approximate date of said conversation and the parties to said conversation.

Answer:

See Answer to Interrogatory Number 28.

30. **Knowledge/Lung Cancer**

Please state whether Defendant, prior to 1980, ever obtained any knowledge concerning the association, if any, between the inhalation of asbestos fibers and lung cancer, in users, consumers and/or persons exposed to asbestos and/or asbestos containing products. If so, please state:

A. When any of this knowledge was first acquired, how it was acquired, identify by whom it was acquired, and state the substance of the knowledge acquired.

B. As to each such occasion thereafter in which your knowledge as to lung cancer increased either relative to the types of exposures (i.e. trades and occupations, etc.) and /or types of products which became associated with the development of lung cancer state:

(1) when was this additional knowledge acquired;

(2) how was this additional knowledge acquired;

(3) identify by whom it was acquired;

(4) state the substance of the additional knowledge acquired;

C. Identify all documents relevant to your acquisition of knowledge concerning lung cancer and the custodian thereof; and,

D. If any of the foregoing knowledge was acquired through an oral conversation, identify each such oral conversation, the approximate date of said conversation and the parties to said conversation.

Answer:

See Answer to Interrogatory Number 28.

Asbestos Warning Label 1983 - 1987

CAUTION

THIS PRODUCT CONTAINS ASBESTOS.
AVOID CREATING DUST. BREATHING
ASBESTOS MAY RESULT IN SERIOUS
BODILY HARM.

Asbestos Warning Label 1987 - Present

DANGER

CONTAINS ASBESTOS FIBERS
AVOID CREATING DUST
CANCER AND LUNG DISEASE
HAZARD

Service & Parts Operations
Chrysler Motors

May 12, 1988

PACKAGE ENGINEERING DEPARTMENT

SERVICE PARTS PROCESSING & PACKAGING SPECIFICATION

2/23/87	PART NAME: SHOE ASY W/ WARNING LBL W/O DISC BRK	PART NO: 04A03500
NO	NPR / PERCENT OF UNPACKAGED MATERIAL PER I-36 STD.: REQUIRED	VENDOR NO: NO STK #
SPRING		PART TYPE CODE: 05-003 003

CATION OF ALL CONTAINERS PER I-20 STANDARD

	CONTAINER NO: VENDOR	DESCRIPTION OF CONTAINER
	CONTAINER SIZE:	CLOSURE: SEE NOTE 1

RAPS

ATE QTY	CONTAINER NO	DESCRIPTION OF CONTAINER
	CONTAINER SIZE:	CLOSURE: SEE NOTE 1
Y	CONTAINER NO	DESCRIPTION OF CONTAINER
	CONTAINER SIZE:	CLOSURE: SEE NOTE 1

PALLET LOAD HEIGHT - 42" INCLUDING PALLET STD. PALLET SIZE 42" x 48" UNLESS DEVIATION AUTHORIZED

	PALLET NO:	PALLET DESCRIPTION:

TOS WARNING LABEL REQ'D	MACHINE CODE:
	ISSUED BY: FREIGHT

G MATERIAL(S) AND/OR PROCESSES MUST BE IN COMPLIANCE WITH LATEST DATE OF ISSUE. THIS CONTINGENCY IS THE SUPPLIER RESPONSIBILITY

NOTE 1: ALL CORRUGATED CARTON CLOSURES TO BE IN ACCORDANCE WITH RULE 41 OF THE UNIFORM FREIGHT CLASSIFICATION. METHOD IS OPTIONAL UNLESS OTHERWISE SPECIFIED.

PACKAGE ENGINEERING DEPARTMENT

SERVICE PARTS PROCESSING & PACKAGING SPECIFICATION

3700/85	PART NAME SHOE-LIN RT WHL DISC	PART NO 8002178C
A&O. 10	NPR / IDENT OF UNPACKAGED MATERIAL PER 1-08 STD.	VENDOR NO. 3/A 3683
OCFING		PART TYPE CODE 05 903-903

FICATION OF ALL CONTAINERS PER I-20 STANDARD

	CONTAINER NO. RCVENDOR	DESCRIPTION OF CONTAINER FOLDING CARTON
QTY 22	CONTAINER SIZE. 5.25"X 1.5" X 7.75"	CLOSURE. SEE NOTE 1
WRAPS		
CK.		

EDIATE QTY	CONTAINER NO.	DESCRIPTION OF CONTAINER.	
O	CONTAINER SIZE.		CLOSURE. SEE NOTE 1
QTY	CONTAINER NO. RCVENDOR	DESCRIPTION OF CONTAINER:	
O PARS	CONTAINER SIZE.		CLOSURE. SEE NOTE 1

UM PALLET LOAD HEIGHT - 42" INCLUDING PALLET. STD. PALLET SIZE 42" x 48" UNLESS DEVIATION AUTHORIZED

QTY 560	PALLET NO. RCVENDOR	PALLET DESCRIPTION:

FOLDING CARTON 5.25"X 1.5" X 7.75"	MACHINE CODE:
MSTR CTN 15.75"X 5.5" X 8.5" RSC	
ASBESTOS WARNING LABEL REQUIRED.	
(04-23-87)	ISSUED BY: D R POWELL

PACKAGING MATERIALS, AND/OR PROCESSES MUST BE IN COMPLIANCE WITH LATEST DATE OF ISSUE. THIS CONTINGENCY IS THE SUPPLIER RESPONSIBILITY

NOTE 1: ALL CORRUGATED CARTON CLOSURES TO BE IN ACCORDANCE WITH RULE 41 OF THE UNIFORM FREIGHT CLASSIFICATION METHOD IS OPTIONAL UNLESS OTHERWISE SPECIFIED.

0180 (5-87)

(3) Place proper spacer gauge on pedal blade or push rod.

(4) Slide switch assembly toward pedal blade or push rod until switch plunger is fully depressed against spacer gauge (on heavy duty or stop light/speed control switches, depress plunger until switch body contacts spacer gauge).

(5) Re-tighten switch bracket screw to 95 inch pounds.

(6) Remove spacer.

DRUM BRAKES

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GENERAL INFORMATION

Front drum brakes are used on certain V-L models only. All drum brake applications are two shoe, internal expanding brakes with application adjusters. The lower ends of the brake shoes are connected by a tubular star wheel adjusting screw (Figs. 1, 4 and 5).

DRUM BRAKES

SERVICE DIAGNOSIS

Condition	Possible Cause	Correction
PEDAL GOES TO FLOOR	(a) Fluid low in reservoir.	(a) Fill and bleed master cylinder.
	(b) Air in hydraulic brake system.	(b) Fill and bleed hydraulic brake system.
	(c) Improperly adjusted brake.	(c) Repair or replace self-adjuster as required.
	(d) Leaking wheel cylinders.	(d) Recondition or replace wheel cylinder and replace both brake shoes.
	(e) Loose or broken brake lines.	(e) Tighten all brake fittings or replace brake line.
	(f) Leaking or worn master cylinder.	(f) Recondition or replace master cylinder and bleed hydraulic system.
	(g) Excessively worn brake lining.	(g) Reline and adjust brakes.
SPONGY BRAKE PEDAL	(a) Air in hydraulic system.	(a) Fill master cylinder and bleed hydraulic system.
	(b) Improper brake fluid (low boiling point).	(b) Drain, flush and refill with brake fluid.
	(c) Excessively worn or cracked brake drums.	(c) Replace all faulty brake drums.
	(d) Broken pedal pivot bushing.	(d) Replace nylon pivot bushing.
BRAKES PULLING	(a) Contaminated lining.	(a) Replace contaminated brake lining.
	(b) Front end out of alignment.	(b) Align front end.
	(c) Incorrect brake adjustment.	(c) Adjust brakes and check fluid.
	(d) Unmatched brake lining.	(d) Match primary, secondary with same type of lining on all wheels.
	(e) Brake shoes distorted.	(e) Replace faulty brake shoes.
	(f) Restricted brake hose or line.	(f) Replace plugged hose or brake line.
	(g) Broken rear spring.	(g) Replace broken spring.
SQUEALING BRAKES	(a) Glazed brake lining.	(a) Cam grind or replace brake lining.
	(b) Saturated brake lining.	(b) Replace saturated lining.

Condition	Possible Cause	Correction
	(c) Weak or broken brake shoe retaining spring.	(c) Replace retaining spring.
	(d) Broken or weak brake shoe return spring.	(d) Replace return spring.
	(e) Incorrect brake lining.	(e) Install matched brake lining.
	(f) Distorted brake shoes.	(f) Replace brake shoes.
	(g) Bent support plate.	(g) Replace support plate.
	(h) Dust in brakes or scored brake drums.	(h) Blow out brake assembly with compressed air and reface brake drums.
CHIRPING BRAKES	(a) Out of round drum or eccentric axle flange pilot.	(a) Repair as necessary, and lubricate support plate contact areas (6 places).
DRAGGING BRAKES	(a) Incorrect wheel or parking brake adjustment.	(a) Adjust brakes and check fluid.
	(b) Parking brakes engaged.	(b) Release parking brakes.
	(c) Weak or broken brake shoe return spring.	(c) Replace brake shoe return spring.
	(d) Brake pedal binding.	(d) Free up and lubricate brake pedal and linkage.
	(e) Master cylinder cup sticking.	(e) Recondition master cylinder.
	(f) Obstructed master cylinder relief port.	(f) Use compressed air and blow out relief port.
	(g) Saturated brake lining.	(g) Replace brake lining.
	(h) Bent or out of round brake drum.	(h) Reface or replace faulty brake drum.
	(i) Incorrect stop light switch adjustment.	(i) Adjust stop light switch.
HARD PEDAL	(a) Brake booster inoperative.	(a) Replace brake booster.
	(b) Incorrect brake lining.	(b) Install matched brake lining.
	(c) Restricted brake line or hose.	(c) Clean out or replace brake line or hose.
	(d) Frozen brake pedal linkage.	(d) Free up and lubricate brake linkage.
WHEEL LOCKS	(a) Contaminated brake lining.	(a) Reline both front or rears of all four brakes.
	(b) Loose or torn brake lining.	(b) Replace brake lining.
	(c) Wheel cylinder cups sticking.	(c) Recondition or replace wheel cylinder.
	(d) Incorrect wheel bearing adjustment.	(d) Clean, pack and adjust wheel bearings.
BRAKES FADE (HIGH SPEED)	(a) Incorrect lining.	(a) Replace lining.
	(b) Overheated brake drums.	(b) Inspect for dragging brakes.
	(c) Incorrect brake fluid (low boiling temperature).	(c) Drain flush, refill and bleed hydraulic brake system.
	(d) Saturated brake lining.	(d) Reline both front or rear or all four brakes.
SURGE Below 15 MPH	(a) Bent or out of round rear brake drum.	(a) Reface or replace brake drum.
CHATTER 80 to 40 MPH	(a) Bent or out of round front brake drum.	(a) Reface or replace brake drum.
SHOE KNOCK	(a) Machine grooves in contact face of brake drum.	(a) Sand, reface or replace brake drum.
	(b) Weak hold down springs.	(b) Replace hold down springs.
BRAKES DO NOT SELF ADJUST	(a) Adjuster screw frozen in thread.	(a) Clean and free-up all thread areas.
	(b) Adjuster screw corroded at thrust washer.	(b) Clean threads and replace thrust washer if necessary.
	(c) Adjuster lever does not engage star wheel.	(c) Repair, free up or replace adjuster as required.
	(d) Adjuster installed on wrong wheel.	(d) Install correct adjuster parts.

SERVICE PROCEDURES

The eleven inch brakes used on taxi vehicles. (Fig. 6) are equipped with manual adjusters. The service procedures covering these brakes are identical to the passenger car, with the exception of reference to application adjusters. Illustrations of the various service procedures will not always show any one specific brake.

BRAKE DRUM REMOVAL

Removing Front Brake Drums—(Nine inch brake only)

To aid in brake drum removal loosen brake star adjusting wheel.

(1) Remove rear plug from brake adjusting access hole.

(2) Insert a thin screwdriver into brake adjusting hole and push adjusting lever away from star adjusting wheel. **Care should be taken not to bend adjusting lever.**

(3) Insert Tool C-3784 into brake adjusting hole and engage notches of brake adjusting star wheel. lease brake adjustment by prying down with adjusting tool.

(4) Remove wheel cover, grease cap, cotter pin, lock, adjusting nut, outer wheel bearing and remove wheel and drum assembly from spindle to expose brake linings (Fig. 1).

(5) Inspect brake lining for wear, shoe alignment, or contamination from grease or brake fluid.

Removing Rear Brake Drums

(1) Remove rear plug from brake adjusting access hole.

(2) Insert a thin screwdriver into brake adjusting hole and hold adjusting lever away from notches of adjusting screw.

(3) Insert Tool C-3784 into brake adjusting hole and engage notches of brake adjusting screw. Release brake by prying down with adjusting tool.

(4) Remove rear wheel and clips from wheel studs that holds drum on axle. Discard clips. Remove drums.

(5) Inspect brake lining for wear, shoe alignment or contamination from grease or brake fluid.

BRAKE SHOE REMOVAL

Removing Front Brake Shoes

(1) Using Tool C-3785 remove brake shoe return

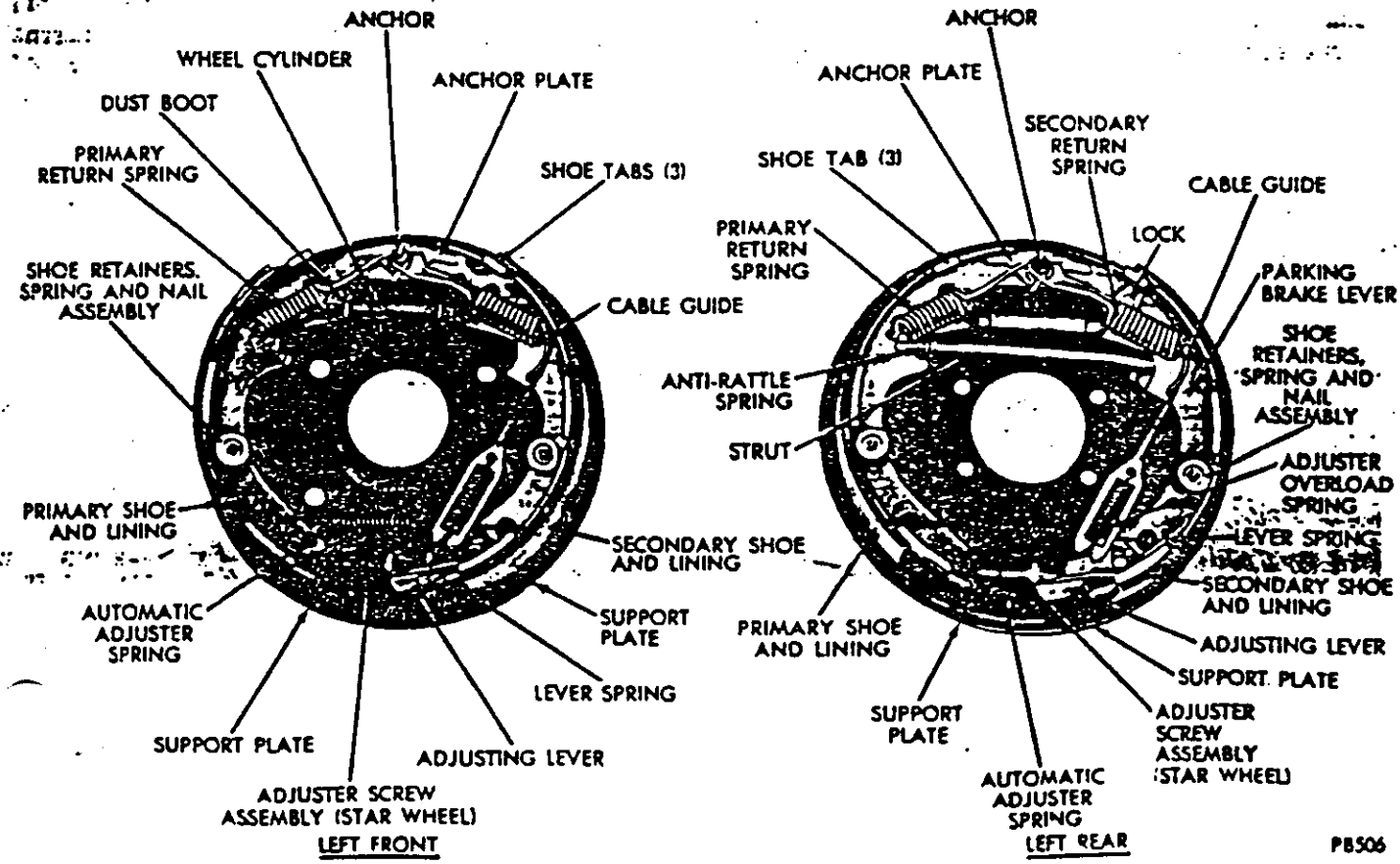

Fig. 1—Nine Inch Brake Assemblies

springs (Fig. 2). (Note how secondary spring overlaps primary spring), (Fig. 1).

(2) Slide eye of automatic adjuster cable off anchor and unhook from adjusting lever. Remove cable, overload spring, cable guide and anchor plate.

(3) Disengage adjusting lever from spring by sliding forward to clear pivot, then working out from under spring. Remove spring from pivot. Remove automatic adjuster spring from secondary shoe web and disengage from primary shoe web. Remove spring.

(4) Remove brake shoe retainers, springs and nails, using Tool C-4070. (Fig. 3).

(5) Remove primary and secondary shoes from support. Remove adjusting star wheel screw assembly from shoes.

Removing Rear Brake Shoes

(1) Remove rear wheel, and drum retaining clips. Remove drum.

(2) Using Tool C-3785, remove brake shoe return springs (Fig. 7). (Note how secondary spring overlaps primary spring) (Figs. 1, 4, 5 or 6).

(3) Slide eye of automatic adjuster cable off anchor and then unhook from adjusting lever. Remove cable, overload spring, cable guide and anchor plate.

(4) Disengage adjusting lever from spring by sliding forward to clear pivot, then working out from under spring. Remove spring from pivot. Remove automatic adjuster spring from secondary shoe web and disengage from primary shoe web. Remove spring.

(5) Disengage primary and secondary shoes from push rods (if so equipped) and remove adjusting star wheel assembly from shoes.

(6) Spread anchor ends of primary and secondary shoes and remove parking brake lever strut and anti-rattle spring (Fig. 13).

(7) Remove brake shoe retainers, springs and nails. Using Tool C-4070, (Fig. 8), and remove from

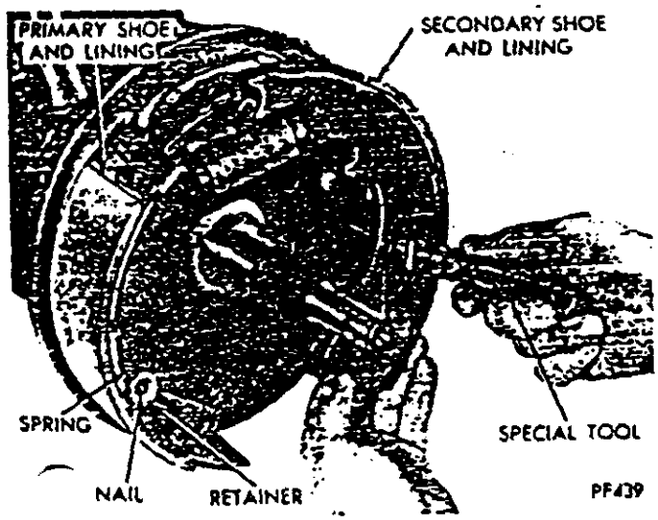

Fig. 2—Removing Shoe Return Springs (Left Front)

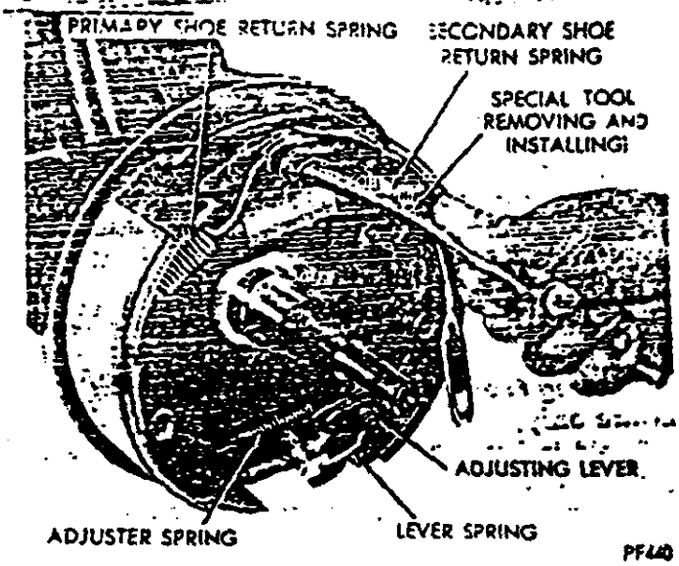

Fig. 3—Removing or Installing Shoe Retainers, Spring and Nails (Right Front)

support.

(8) Disengage parking brake cable from parking brake lever.

CLEANING AND INSPECTION

Wipe or brush clean (dry) the metal portions of the brake shoes. Examine the lining contact pattern to determine if the shoes are bent. The lining should

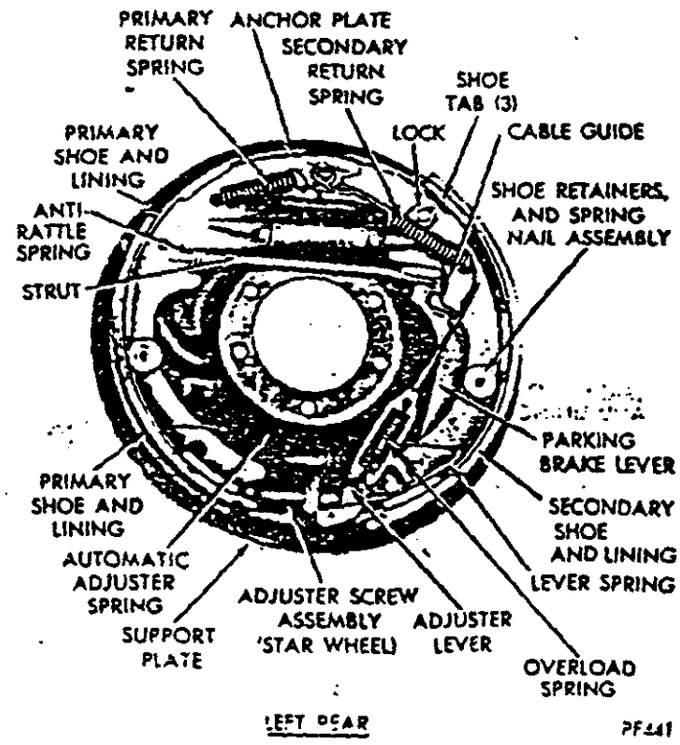

Fig. 4—Ten Inch Brake Assembly—(Rear)

...ngs (Fig. 2). (Note how secondary spring overlaps primary spring), (Fig. 1).

(2) Slide eye of automatic adjuster cable off anchor and unhook from adjusting lever. Remove cable, overload spring, cable guide and anchor plate.

3) Disengage adjusting lever from spring by sliding forward to clear pivot, then working out from under spring. Remove spring from pivot. Remove automatic adjuster spring from secondary shoe web and disengage from primary shoe web. Remove spring.

(4) Remove brake shoe retainers, springs and nails, using Tool C-4070. (Fig. 3).

(5) Remove primary and secondary shoes from support. Remove adjusting star wheel screw assembly from shoes.

Removing Rear Brake Shoes

(1) Remove rear wheel, and drum retaining clips. Remove drum.

(2) Using Tool C-3785, remove brake shoe return springs (Fig. 7). (Note how secondary spring overlaps primary spring) (Figs. 1, 4, 5 or 6).

(3) Slide eye of automatic adjuster cable off anchor and then unhook from adjusting lever. Remove cable, overload spring, cable guide and anchor plate.

Disengage adjusting lever from spring by sliding forward to clear pivot, then working out from under spring. Remove spring from pivot. Remove automatic adjuster spring from secondary shoe web and disengage from primary shoe web. Remove spring.

(5) Disengage primary and secondary shoes from push rods (if so equipped) and remove adjusting star wheel assembly from shoes.

(6) Spread anchor ends of primary and secondary shoes and remove parking brake lever strut and anti-rattle spring (Fig. 13).

(7) Remove brake shoe retainers, springs and nails. Using Tool C-4070, (Fig. 8), and remove from

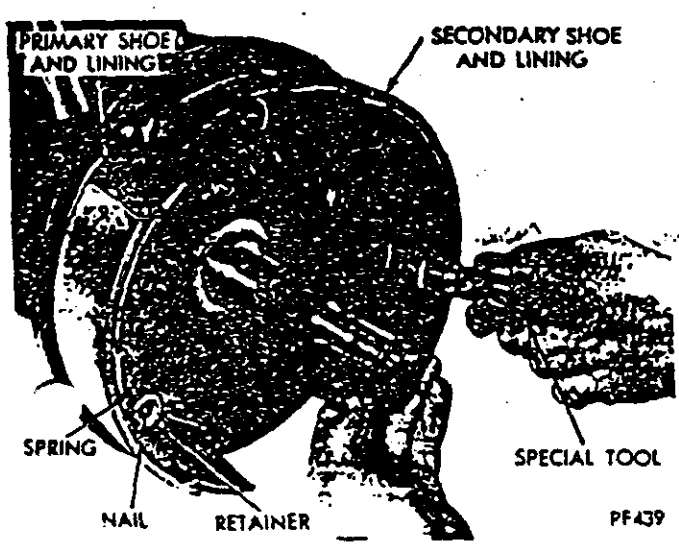

Fig. 2—Removing Shoe Return Spri... (Left Front)

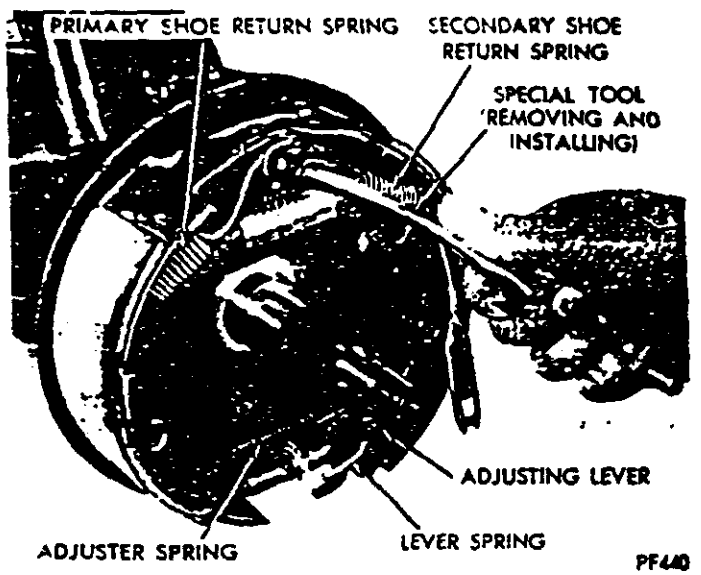

Fig. 3—Removing or Installing Shoe Retainers, Spring and Nails (Right Front)

support.

(8) Disengage parking brake cable from parking brake lever.

CLEANING AND INSPECTION

Wipe or brush clean (dry) the metal portions of the brake shoes. Examine the lining contact pattern to determine if the shoes are bent. The lining should

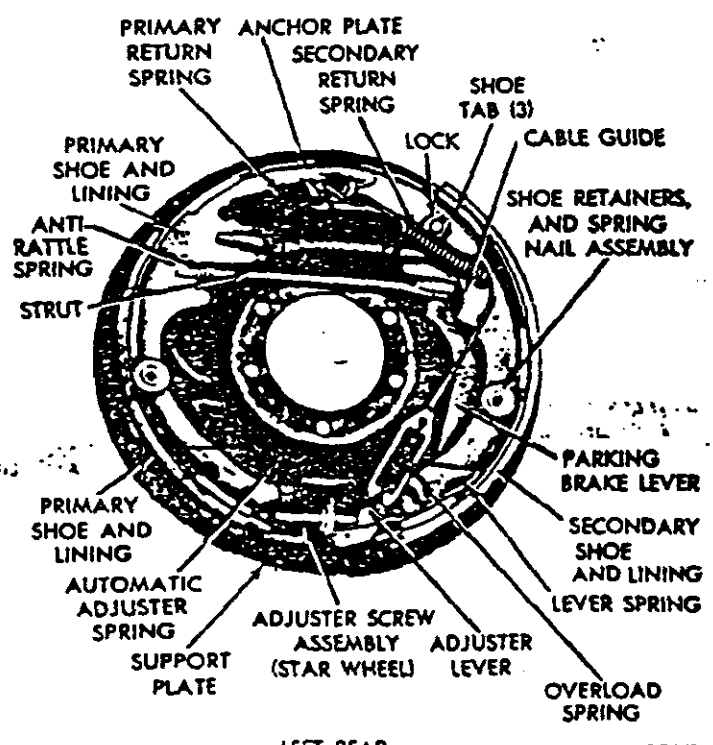

Fig. 4—Ten Inc... Brake Assembly—(Rear)

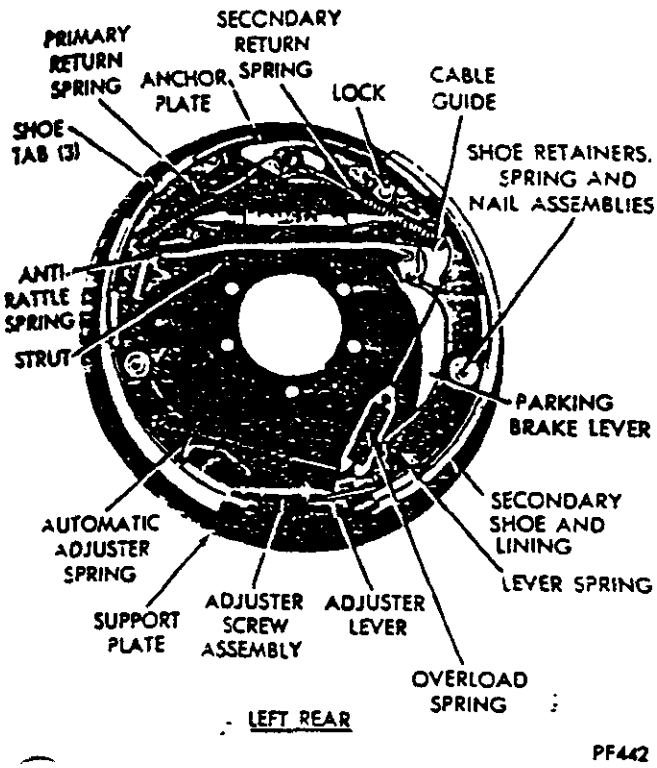

Fig. 5—Eleven Inch Brake Assembly—(Rear)

show contact across the entire width, extending from heel to toe. Shoes showing contact only on one side should be replaced. Shoes having sufficient lining but lack of contact at toe and heel should be measured for proper grind.

Clean the support, using a suitable solvent, then

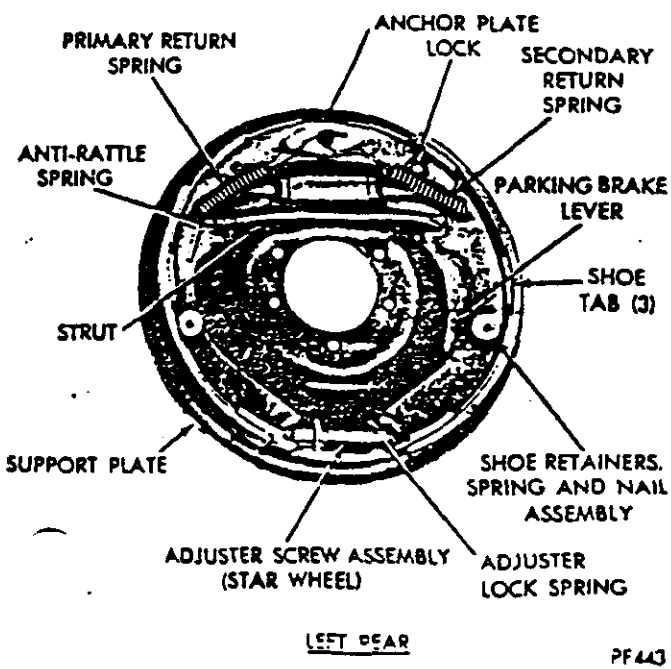

Fig. 6—Eleven Inch Brake Assembly—(Without Automatic Adjusters)—(Rear)

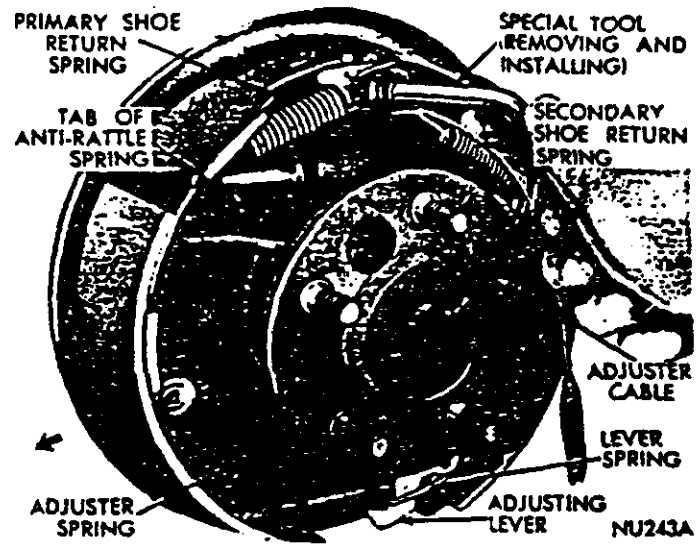

Fig. 7—Removing Shoe Return Springs—(Left Rear)

inspect for burrs. Remove if necessary. Clean and inspect the adjusting screws for pulled or stripped threads, then apply a thin film of lubricant to the threads, socket and washer (Fig. 9). Replace adjuster screw if corrosion of any part inhibits very free operation.

New brake shoe return springs and hold down springs should be installed where the old springs have been subjected to overheating or if their strength is questionable. Spring paint discoloration or distorted end coils would indicate an overheated spring.

GRINDING AND REFACING RECOMMENDATIONS

Brake Shoe Lining—New lining should be measured and ground .060 in. to .080 in. (maximum under the drum diameter). When replacing brake shoe and lining assemblies, always check them in the drum

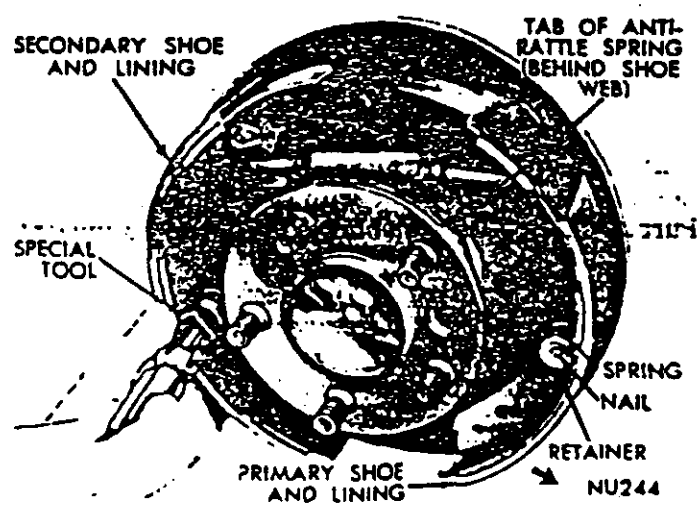

Fig. 8—Removing or Installing Shoe Retainers, Springs, and Nails—(Right Rear)

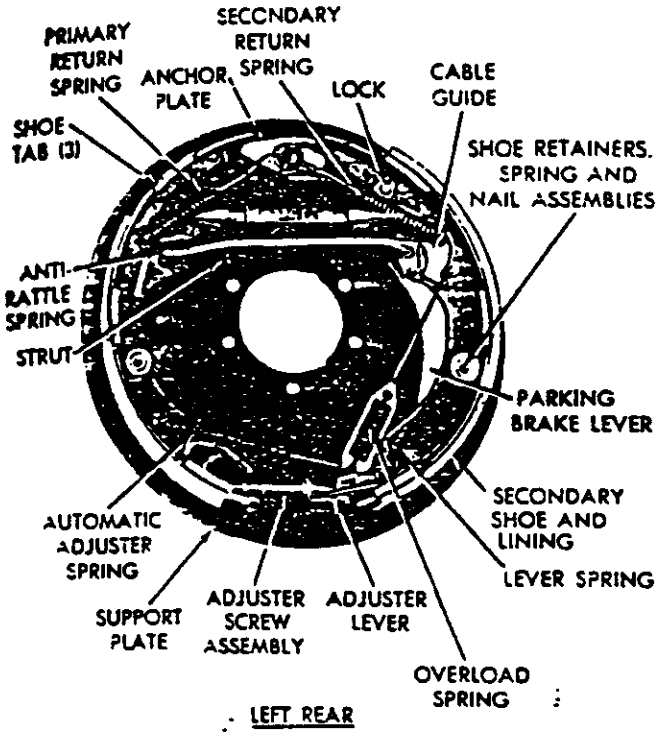

Fig. 5—Eleven Inch Brake Assembly—(Rear)

show contact across the entire width, extending from heel to toe. Shoes showing contact only on one side should be replaced. Shoes having sufficient lining but lack of contact at toe and heel should be measured for proper grind.

Clean the support, using a suitable solvent, then

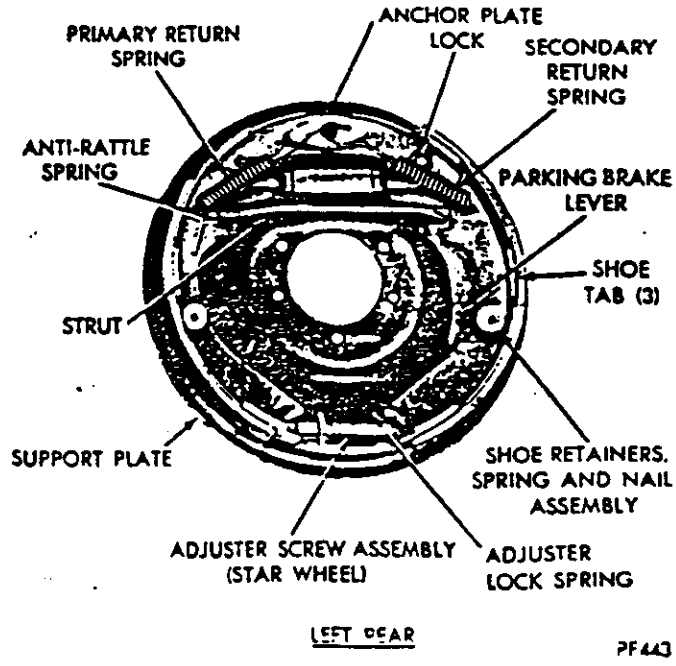

Fig. 6—Eleven Inch Brake Assembly—(Without Automatic Adjusters)—(Rear)

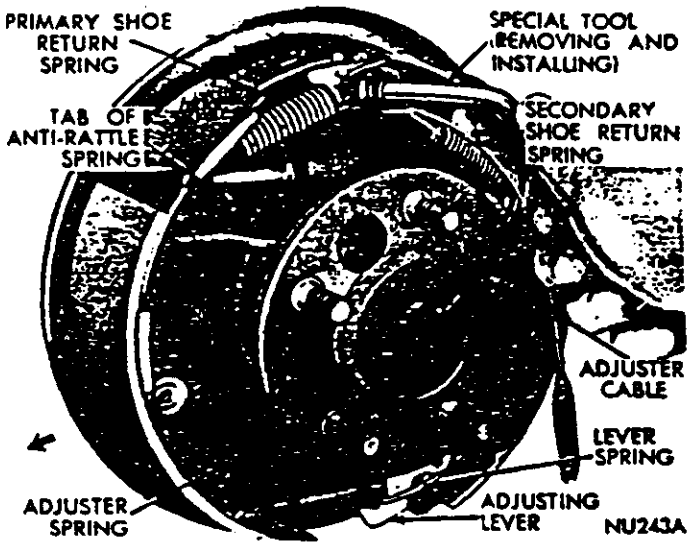

Fig. 7—Removing Shoe Return Springs—(Left Rear)

inspect for burrs. Remove if necessary. Clean and inspect the adjusting screws for pulled or stripped threads, then apply a thin film of lubricant to the threads, socket and washer (Fig. 9). Replace adjuster screw if corrosion of any part inhibits very free operation.

New brake shoe return springs and hold down springs should be installed where the old springs have been subjected to overheating or if their strength is questionable. Spring paint discoloration or distorted end coils would indicate an overheated spring.

GRINDING AND REFACING RECOMMENDATIONS

Brake Shoe Lining—New lining should be measured and ground .060 in. to .080 in. (maximum under the drum diameter). When replacing brake shoe and lining assemblies, always check them in the drum

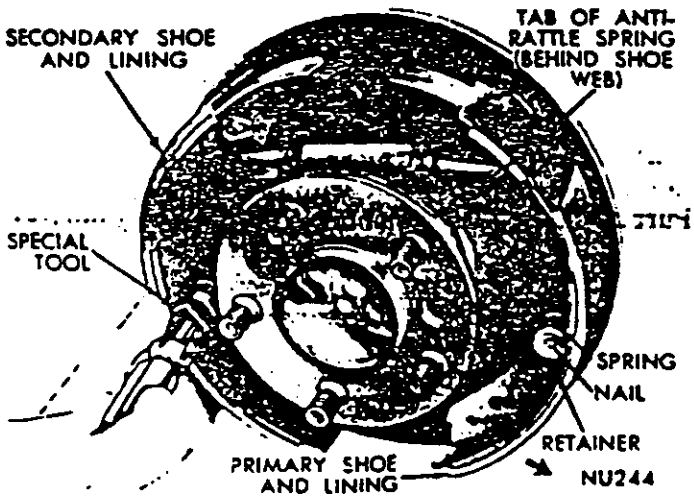

Fig. 8—Removing or Installing Shoe Retainers, Springs, and Nails—(Right Rear)

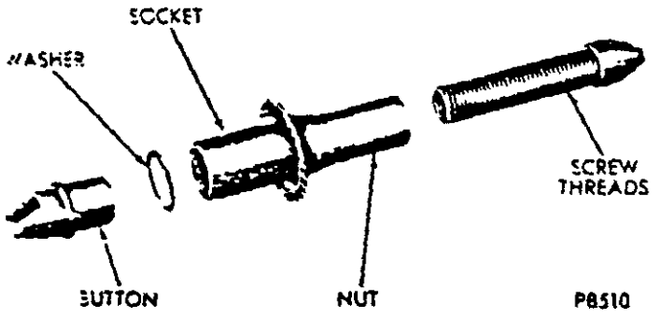

Fig. 9—Adjuster Screw Assembly

they are to be used with to insure that they have the recommended radius grind. This grind, which should provide at least .004 inch heel and toe clearance, is necessary for proper lining to drum contact during brake application.

CAUTION: When resurfacing or refacing brake shoes follow manufacturing recommendations for proper use of their equipment. **Whatever equipment is used, ensure that proper ventilation is provided to remove asbestos dust, which can be detrimental to health.**

Drum Refacing—Measure the drum runout and diameter with an accurate gauge. There should be no variation in the drum diameter greater than .002 inch. Drum runout should not exceed .006 inch out of round. If the drum runout or diameter variation exceed these values the drum should be refaced. Remove only as much material as is necessary to clean up the drum. It is recommended the front drums be refaced with the wheel and tire mounted. **Do not reface more than .060 inch over the standard drum diameter.**

NOTE: All drums will show markings of maximum allowable diameter (Fig. 10). For example, a nine inch drum will have a marking of MAX. DIA. 9.090". This marking includes .030" for allowable drum wear beyond the recommended .060" of drum refacing.

BRAKE SHOE INSTALLATION

Installing Front Brake Shoes

Lubricate with a thin film the shoe tab contact area (6 places) on support plate with Chrysler Parts Multi-Purpose Grease, Part number 2932524 or equivalent (Fig. 11).

(1) Match a primary with a secondary brake shoe and place them in their relative position on a work bench.

(2) Install adjusting star wheel assembly between primary and secondary shoes, with a star wheel next to secondary shoe (Fig. 1).

The left star wheel adjusting stud end is stamped "L" indicating its position on the vehicle and is also cadmium plated. The right star wheel is black, and the adjusting stud end is not stamped.

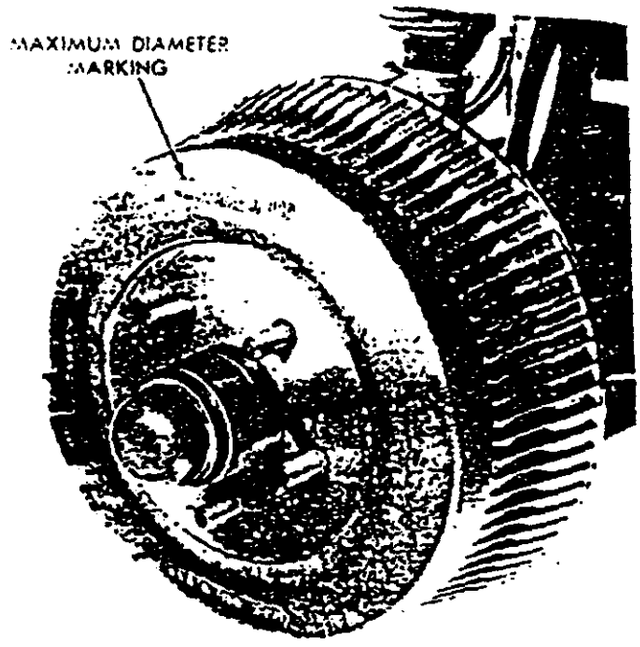

Fig. 10—Nine Inch Drum—Maximum Diameter Identification

(3) Install adjuster spring in primary shoe and hook other end in web of secondary. Install adjusting lever spring over pivot pin on shoe web. Install adjusting lever under spring and over pivot pin. Slide lever slightly rearward to lock in position (Fig. 1).

(4) Spread anchor ends of brake shoe to hold star adjusting wheel assembly in position.

(5) Holding brake shoes firmly, place assembly on support plate, and at the same time engage shoe webs with wheel cylinder pistons (Fig. 12).

(6) Using Tool C-4070, install shoe retaining nails, springs and retainers. (Fig. 6).

(7) Install anchor plate over anchor.

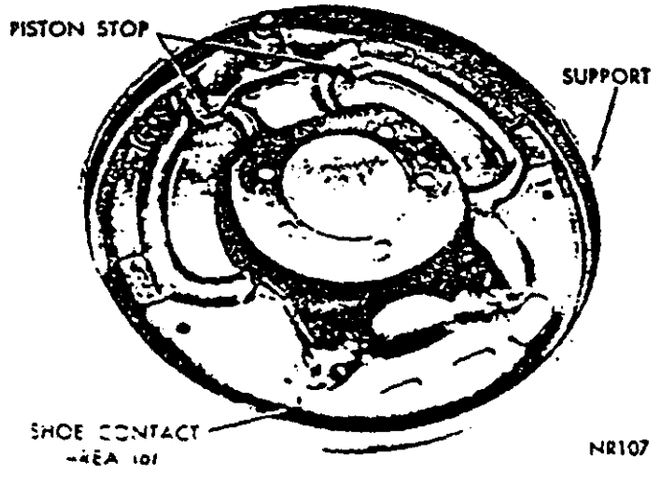

Fig. 11—Shoe Contact Area on Support

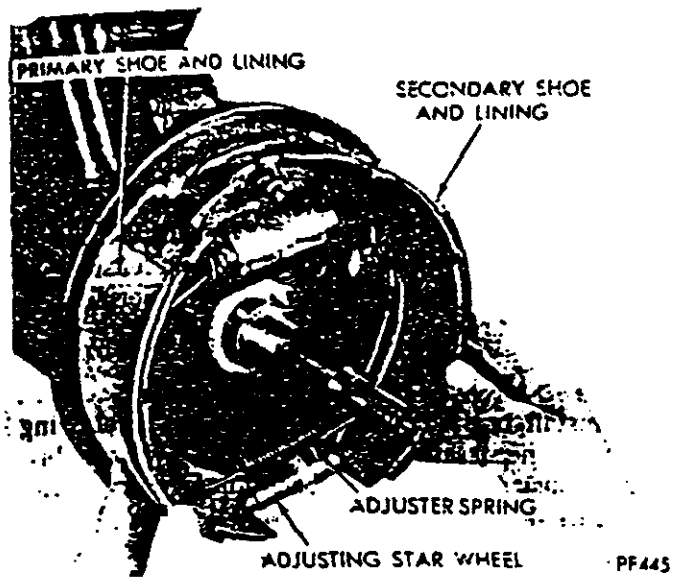

Fig. 12—Installing Brake Shoes—(Left Front)

(8) Slide "eye" of adjusting cable over anchor and against anchor plate. Engage end of primary shoe return spring in shoe web and install other end over anchor, using Tool C-3785.

(9) Install cable guide in secondary shoe web. Holding guide in position, engage secondary shoe return spring through guide and into web. Install other end over anchor, using Tool C-3785. (Be sure cable guide remains flat against shoe web, and that secondary spring overlaps primary) (Fig. 1). Using pliers, squeeze ends of spring loops (around anchor) until parallel.

(10) Thread adjuster cable over guide and hook end of overload spring in lever (Fig. 1). (Be sure "eye" of cable is pulled tight against anchor and in a straight line with guide).

Installing Rear Brake Shoes

Lubricate with a thin film the shoe tab contact area (6 places) on support plate with Chrysler Parts Multi-Purpose Grease, Part number 2932524 or equivalent (Fig. 11).

(1) Install parking brake lever on inner side of secondary shoe web after lubricating pivot with support plate lubricant. Secure with wave washer and horseshoe clip.

(2) Engage parking brake lever with cable, then slide secondary shoe against support plate, and at the same time engage shoe web with push rod, (if so equipped) and against anchor.

(3) Slide parking brake strut behind hub and into slot in parking brake lever. Slide anti-rattle spring over free end of strut (Fig. 13). On ten inch brakes, be sure spring tab is pointing rearward and up on outside of shoe web (Left Brake), and pointing frontward and down behind shoe web (Right Brake) (Fig. 13). On eleven inch brakes, be sure spring tab is pointing forward, down and inside of shoe web (both Left and Right Brake) (Fig. 5).

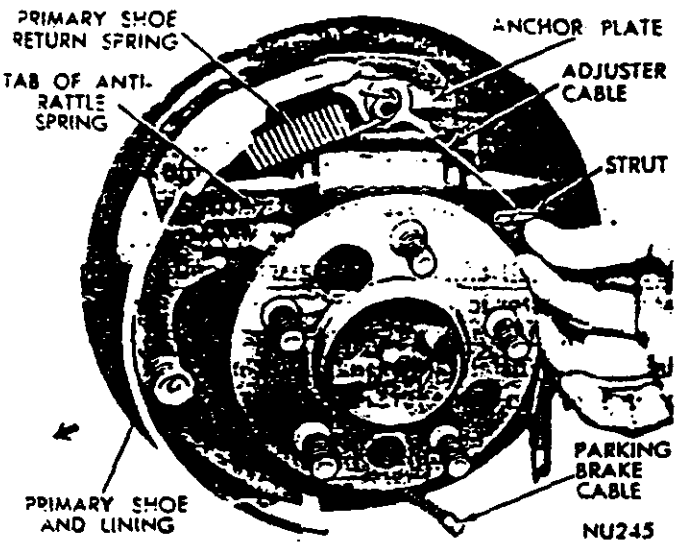

Fig. 13—Removing or Installing Parking Brake Strut and Spring—(Left Rear)

(4) Slide primary shoe into position and engage with push rod (if so equipped) and free end of strut. Install anchor plate over anchor, then install eye of adjuster cable over anchor (Fig. 14).

(5) Engage primary shoe return spring in web of shoe and install free end over anchor, using Tool C-3785. (Fig. 7).

(6) Install cable guide in secondary shoe web. Holding in position, engage secondary shoe return spring through guide and into web. Install other end over anchor, using Tool C-3785. (Be sure cable guide remains flat against shoe web and that secondary spring overlaps primary) (Fig. 1). Using pliers, squeeze ends of spring loops (around anchor) until parallel.

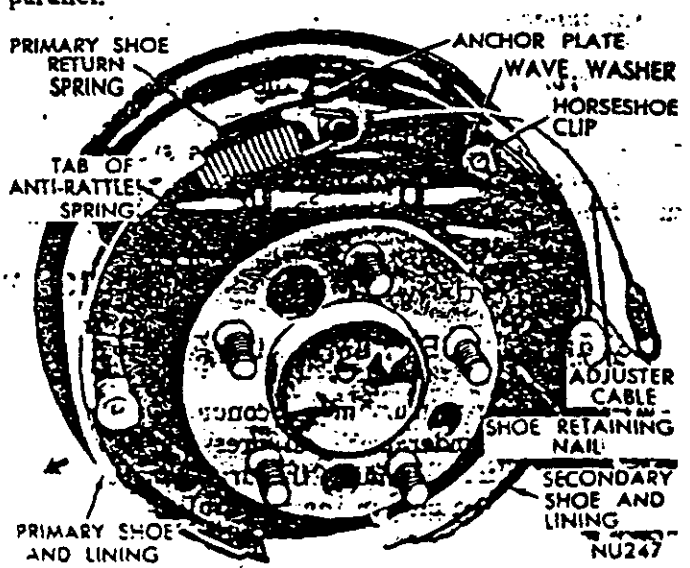

Fig. 14—Installing Brake Shoes—(Left Rear)

(7) Install adjusting star wheel assembly between primary and secondary shoes, with star wheel next to secondary shoe (Fig. 1). The left star wheel adjusting stud end is stamped "L" (indicating its position on the vehicle) and is also cadium plated. The right star wheel is black, and the adjusting stud end is not stamped. Install adjuster spring between shoes (Figs. 1, 4 and 5). (Engage primary shoe first). (Eleven inch brakes, install adjuster spring with coil forward, opposite adjuster lever, Fig. 5).

(8) Install adjusting lever spring over pivot pin on shoe web. Install adjusting lever under spring and over pivot pin. Slide lever slightly rearward to lock in position.

(9) Using Tool C-4070, install shoe retaining nails, retainers and springs (Fig. 8).

(10) Thread adjuster cable over guide and hook end of overload spring in lever (Fig. 1). (Be sure eye of cable is pulled tight against anchor and in a straight line with guide).

BRAKE DRUM INSTALLATION

Installing Front Brake Drums

(1) Lubricate wheel bearings and install brake drum and adjust wheel bearing to proper preload.

(2) Adjust brakes as described under "Service Adjustments" at front of this Group.

Installing Rear Brake Drums

(1) Install brake drum. Reinstallation of retaining clips is not necessary. Install wheel and tire assembly.

(2) Adjust brakes as described under "Service Adjustments" at front of this Group.

MASTER CYLINDER

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Bleeding Master Cylinder	15	Master Cylinder Removal	12
Cleaning and Inspection	14	Master Cylinder—Special Tools	89
Disassembling Master Cylinder	12	Reassembling Master Cylinder	14
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Installing Master Cylinder	15	Tool Identification Picture	89
Master Cylinder Identification Chart	13		

GENERAL INFORMATION

The vehicle identification number on the instrument panel starts with a capital letter which indicates the carline or sales name of vehicle (see Introduction of this manual). These code letters are also used to indicate the vehicle to which the service information applies.

The tandem master cylinder (Fig. 1) is of the compensating type with the reservoirs cast integrally.

The front outlet tube from the master cylinder is connected to the hydraulic system warning switch tee and then to the rear brakes. This system is referred to as SECONDARY (marked R). The rear outlet tube from the master cylinder is also connected to the warning switch tee and the front brakes. This system is referred to as PRIMARY (marked F). The master cylinder used on a vehicle not equipped with a power brake unit is serviced in the same manner as the master cylinder with a power brake unit, with one exception, the master cylinder for power brakes does not include the pushrod.

The disc brake master cylinder is different from the drum brake master cylinder in reservoir, cover, bail, and gasket size, and only THE SECONDARY OUTLET HAS RESIDUAL PRESSURE VALVE AND SPRING (Fig. 1).

SERVICE PROCEDURES

MASTER CYLINDER REMOVAL

(1) Disconnect primary and secondary brake tubes from master cylinder (residual pressure valves will keep cylinder from draining the drum brake master cylinder). Install a plug in the rear outlet of the disc brake master cylinder.

(2) Remove nuts that attach master cylinder to cowl panel and/or power brake unit (if so equipped).

(3) Disconnect pedal push rod (manual brakes) from brake pedal.

(4) Slide master cylinder straight out from cowl panel and/or power brake unit (if so equipped).

DISASSEMBLING MASTER CYLINDER

To disassemble the master cylinder, (Fig. 1) clean outside of master cylinder thoroughly.

IN THE CIRCUIT COURT OF THE
11TH JUDICIAL CIRCUIT IN AND
FOR DADE COUNTY, FLORIDA

GENERAL JURISDICTION DIVISION

CASE NO.: 95-10261 CA 42

TIMOTHY TINKER and ANN TINKER,
his wife,

Plaintiffs,

-vs-

CHRYSLER CORPORATION, BEAVER
DAM PRODUCTS CORPORATION formerly
known as Chrysler Marine
Corporation, et. al.

Defendants .
_____/

NOTICE OF SERVICE OF DEFENDANT'S, CHRYSLER CORPORATION, AMENDED RESPONSES TO MASTER PRELIMINARY INTERROGATORIES

Defendant, **CHRYSLER CORPORATION**, through undersigned counsel hereby gives Notice of Service of its Amended Responses to Master Preliminary Interrogatories dated June 29, 1995.

HERZFELD & RUBIN
Suite 400
1901 W. Cypress Creek Road
Fort Lauderdale, Florida 33309
(305) 772-3599
Attorneys for Chrysler Corporation
and Beaver Dam Products Corporation

BY: _____
DAVID I. WEISS
Fla. Bar No. 656976

CERTIFICATE OF SERVICE

WE HEREBY CERTIFY that a true and correct copy of the foregoing was this 29th day of February, 1996, delivered by mail to **DAVID LIPMAN, ESQUIRE, Counsel for Plaintiff,** 5901 S.W. 74th Street, Suite 304, Miami, Florida 33143.

HERZFELD & RUBIN
Suite 400
1901 W. Cypress Creek Road
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(305) 772-3599
Attorneys for Chrysler Corp.
and Beaver Dam Products Corp.

BY: _____
DAVID I. WEISS
Fla. Bar No. 656976

GENERAL STATEMENT

Defendant, Chrysler Corporation (hereinafter, "Chrysler"), has provided responses to plaintiff's discovery requests pursuant to a reasonable and duly diligent investigation and search for information requested. The responses are given without prejudice to further discovery.

These responses are based upon facts known or believed by Chrysler at the time of answering these discovery requests. Much of the information requested dates back many years and is difficult or impossible to reconstruct or retrieve.

Thousands of employees have worked at Chrysler Corporation over the years. In conducting business, Chrysler Corporation has created millions of documents kept in numerous geographic locations that have been moved as required. Accordingly, Chrysler Corporation does not represent that the responses contained herein provide all information requested; rather these responses reflect information obtained before this date by Chrysler Corporation pursuant to a reasonable and duly diligent search and investigation in those areas where this information was expected to be found. To the extent that the request purports to require more, Chrysler objects on grounds that include that compliance with the request probably is not feasible and would impose an undue burden or expense.

If additional discovery requests are propounded upon Chrysler, it will not review the present discovery request to ascertain whether or subsequent to Chrysler's response to these interrogatories new information might be responsive to the present

discovery request, except as governed by the Rules of Civil Procedures. To the extent that the present request purports to impose such an obligation, Chrysler objects on grounds that the request contravenes rules and, in addition, seeks to impose an undue burden and expense.

Chrysler objects to requests for information about subjects other than brake and clutch friction products as being outside the scope of activities which are the subject of this lawsuit and on the ground that the request seeks information that is neither relevant nor likely to lead to discovery of admissable evidence. Therefore, Chrysler objects to requests where the matter sought is neither relevant to the subject of this lawsuit nor reasonably calculated to lead to discovery of admissable evidence.

Although plaintiff has served Chrysler with a request, plaintiff may have some pertinent documents, perhaps even some Chrysler documents not received from Chrysler. Chrysler objects on the grounds that it would be less burdensome, more convenient, and less expensive for plaintiff to identify what documents plaintiff already has that may fall within the scope of these requests. This would accomplish several purposes: (1) it would obviate Chrysler's having to search for and copy documents already in plaintiff's possession; (2) it would enable Chrysler to use the documents provided as guides in looking for related material; and (3) it would, if your purpose were to obtain authentication of particular documents, enable Chrysler to authenticate the copies provided by you without having to conduct an uninformed search for

the documents.

Additionally, Chrysler objects to the definition of "asbestos", "asbestos products", "product containing asbestos fibers", "asbestos containing product" and "industrial insulation product" as applied to answering defendant, in that said term are overly broad, generic and encompass numerous different materials, each of which has a different chemical structure and composition. In that Chrysler has only used one specific type of asbestos material in certain components used in certain parts and in that this material is chrysotile asbestos, Chrysler hereby interprets the term "asbestos" as used in these interrogatories to be limited to chrysotile asbestos. Further, Chrysler states that it does not manufacture or sell "raw asbestos". In that many of the requests propounded by plaintiff, as drafted, are directed to manufacturers or suppliers of raw asbestos or insulation products, the requests are unintelligible, vague and confusing as to Chrysler.

Chrysler also generally objects to the requests as overly broad, irrelevant, and unduly burdensome. In this regard, the requests seek information beyond plaintiff's alleged working history and alleged exposure. Chrysler's corporate records do not indicate sales to any of plaintiff's employers. Further, plaintiff's work history encompasses years and it is burdensome and oppressive to provide information as to all products manufactured or sold by Chrysler during that period, as plaintiff has not provided specific information as to the dates, type of asbestos containing products manufactured or sold by Chrysler, and

the makes and models of vehicles serviced. In the spirit of discovery, however, Chrysler provides information herein.

Finally, the responses in Chrysler's answers to plaintiff's discovery requests are made solely for the purpose of this lawsuit, and these responses incorporate the foregoing objections into each of the specific responses set forth below.

PRELIMINARY INTERROGATORIES

1. **Data Sources**

Please identify each person with whom you consulted or who provided information used in answering these Interrogatories on behalf of Defendant. Additionally, provide the subject matter category that each person provided information for from the following categories if appropriate:

1. Corporate History
2. Product Information
3. Warnings/Knowledge of Potential Danger/State of the Art/Testing/Medical or Scientific

Identify each person's:

A. Address;
B. Position with the Defendant;

Answer:

This defendant objects to this interrogatory to the extent that it calls for information within the attorney-client privilege or the work product doctrine. Notwithstanding this objection, Chrysler's response to plaintiff's discovery request represents compilation of information over time. Further, without waiving the foregoing objection, aside from counsel for Chrysler, James Knoll has provided information contained herein. Knoll, who is no longer a Chrysler employee, was a brake engineer for Chrysler.

2. **Corporate Information**

Please state the following:

A. This defendant's correct corporate name;

Answer:

Chrysler Corporation

B. The state of your incorporation;

Answer:

Delaware

C. The address of your principal place of business;

Answer: **Michigan**

D. The dates and time period during which defendant held a certificate of authority to do business in the state of Florida;

Answer:

Objection, overbroad without relation to the facts set forth in the Complaint.

E. The dates and time period during which defendant regularly conducted business in Florida.

Answer:

Objection, overbroad without relation to the facts set forth in the Complaint.

3. **Corporate History**

Describe in detail Defendant's complete corporate or business history for all associated business entities that were involved, in any manner, in the sale, manufacture, distribution, and/or mining of asbestos and/or asbestos containing products, including dates of incorporation, mergers, consolidations, reincorporations, and the like. Also provide historical information regarding all predecessors, prior names, asset purchases, acquisitions or spin-offs for all associated business entities that were involved, in any manner, in the sale, manufacture, distribution, and/or mining of asbestos and/or asbestos containing products. In addition:

A. If defendant or any of its predecessors or subsidiaries at any time purchased or assumed any of the assets and/or liabilities of any corporation or entity which at any prior time engaged in the manufacturing or sale of asbestos-containing products, then please state the following as to each acquisition:

1. The name or description of each corporation, entity or assets acquired by Defendant, that entity's state of incorporation and principal place of business, its date of incorporation, and the name of Defendant at the time of acquisition;

2. The manner by which each such corporation, entity or interest therein, was acquired (e.g., merger consolidation, change of name, stock sale, transfer or purchase of assets or product line);

3. The date of each such acquisition;

4. The state in which each such acquisition was effected;

5. The state law governing each such acquisition if specified by contract and

6. How the business or financial interest in that corporation or entity ended, if it ended. (e.g. dissolved the company, sold all stock, placed subsidiary in bankruptcy, etc.)

7. List all states where entity is or was registered to do business, including the dates of registration for each state.

Answer:

Chrysler objects to this interrogatory on the grounds that it is overbroad and not reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving the foregoing objection, Chrysler states that the current legal name under which it does business is Chrysler Corporation. Chrysler Corporation was incorporated on June 6, 1925. Chrysler Corporation is authorized to do business in every state of the United States. Chrysler Corporation has had many subsidiary corporations since 1925, none of which would have any bearing to this litigation.

bestos Mining

Did Defendant, prior to 1980, engage in the mining, milling and/or subsequent sale of asbestos fiber? If so, please state?

wer:

No.

A. The date such activity began;

Not applicable.

B. The years during which such activity took place;

Not applicable.

C. If such activity was terminated;

Not applicable.

D. If such activity was terminated, the reason why;

Not applicable.

E. Within in the United States was there any geographic limitation which you claim was applicable to the sales of your asbestos (Yes or No)?

Not applicable.

F. Identify the organizational unit of Defendant so engaged.

Not applicable.

G. Type of asbestos mined.

Not applicable.

H. Managers of each mine and years of service.

Not applicable.

I. Identify sales and shipment records from each mine.

Not applicable.

sbestos/Manufacture

Has Defendant at any time, engaged in the manufacture of any asbestos containing product which generic product type has been previously identified in exposure sheets in this circuit? If so, please state:

A. The date such activity began;

nswer:

Objection, overbroad, burdensome and harassing. Additionally, this interrogatory requires Chrysler Corporation to engage in a massive review of each asbestos litigation file ever initiated in the 11th Judicial Circuit, Dade County, Florida.

Further, this question is not likely to lead to admissible evidence. Without waiving the foregoing objection, from 1959 to 1988 Chrysler Corporation manufactured brake linings at a Chrysler plant in addition to purchasing brake linings from other suppliers. Chrysler never manufactured clutch facings.

B. The years during which such activity took place;

nswer:

See response to Interrogatory 5(a) above.

C. If such activity was terminated;

nswer:

See response to Interrogatory 5(a) above.

D. If such activity was terminated, the reason why;

nswer:

Chrysler discontinued manufacture of brake linings in

1988 for economic reasons and shut down a plant based upon a reduction of the work force and expenses.

E. Within in the United States was there any geographic limitation which you claim was applicable to the sales of your asbestos (Yes or No)?

Answer:

Not applicable. Chrysler did not sell asbestos

If Yes state the geographical area into which you claim your asbestos containing products were sold; and

F. Identify the organizational unit of Defendant so engaged.

Answer:

Not applicable. Chrysler did not sell asbestos.

6. **Asbestos/Sales**

Has Defendant at any time, engaged in the marketing and/or sale of any asbestos containing product which generic product type has been previously identified in exposure sheets in this circuit? If so, please state:

A. The date such activity began;

Answer:

Objection, overbroad, burdensome and harassing. Additionally, this interrogatory requires Chrysler Corporation to engage in a massive review of each asbestos litigation file ever initiated in the 11th Judicial Circuit, Dade County, Florida. Notwithstanding said objections, Chrysler conducts advertising pursuant to brand name and not any particular product. See also response to Interrogatory 5(a) above.

B. The years during which such activity took place;

Answer:

See response to Interrogatory 6(a) and 5(a) above.

C. If such activity was terminated;

Answer:

See response to Interrogatory 5(a) above.

D. If such activity was terminated, the reason why;

Answer:

See response to Interrogatory 5(a) above.

E. Within in the United States was there any geographic limitation which you claim was applicable to the sales of your asbestos (Yes or No)?

Answer:

See response to Interrogatory 5(e) above.

F. Identify the organizational unit of Defendant so engaged.

Answer:

See response to Interrogatory 5(f) above.

G. Identify all sales managers and the years during which they served.

Answer:

See response to Interrogatory 5(f) above.

7. **Asbestos/Distributor**

Has Defendant at any time, engaged in the marketing and/or sale of any asbestos containing product, which generic product type has been previously identified in exposure sheets in this circuit, manufactured in whole or in part by an unrelated business entity? If so, please state:

A. The name and address of the unrelated business entity;

Answer: **Objection, overbroad, burdensome and harassing. Additionally, this interrogatory requires Chrysler Corporation to engage in a massive review of each asbestos litigation file ever initiated in the 11th Judicial Circuit, Dade County, Florida. Without waiving the foregoing objection standard transmission clutch facings were manufactured by Raybestos. With respect to brakes, Chrysler is aware of the purchase of brake linings from the following entities from vehicle years 1958 to 1994.**

1958 Abex Corporation (formerly known as American Brake Block); Johns-Manville Corporation

1959 Abex Corporation; Chrysler Corporation; Johns-Manville Corporation

1960 Same as 1968.

1961 Same as 1968.

1962 Bendix Corporation; Chrysler Corporation; Johns-Manville Corporation.

1963 Same as 1981.

1964 Same as 1981.

1965 Same as 1968.

1966 Same as 1968.

1967 Same as 1968.

1968 Abex Corporation; Bendix Corporation; Chrysler Corporation; Johns-Manville Corporation.

1969 Same as 1978.

1970 Same as 1981.

1971 Same as 1981.

1972 Same as 1981.

1973	Same as 1981.
1974	Bendix Corporation; Chrysler Corporation; Raybestos-Manhattan.
1975	Same as 1981.
1976	Same as 1981.
1977	Same as 1981.
1978	Abex Corporation; Bendix Corporation; Chrysler Corporation.
1979	Same as 1981.
1980	Same as 1981.
1981	Bendix Corp. - Friction Materials Division; Chrysler Corp. - Chemical Division.
1982	Bendix Corp. - Friction Materials Division; Chrysler Corp. - Chemical Division.
1983	Bendix Corp. - Friction Materials Division; Chrysler Corp. - Chemical Division.
1984	Bendix Corp. - Friction Materials Division; Chrysler Corp. - Chemical Division.
1985	Bendix Corp. - Friction Materials Division; Chrysler Corp. - Chemical Division.
1986	Bendix Corp. - Friction Materials Division; Chrysler Corp. - Chemical Division; Abex.
1987	Bendix Corp. - Friction Materials Division; Chrysler Corp. - Chemical Division; Abex; FDP (Friction Development Products).
1988	Bendix Corp. - Friction Materials Division; Chrysler Corp. - Chemical Division; Abex; FDP.
1989	Bendix Corp. - Friction Materials Division; Chrysler Corp. - Chemical Division; Abex; Valeo; Delco; Inland. *Last vehicle year for Chrysler.
1990	Abex; Bendix Corp. - Friction Materials Division; FDP; Valeo; Delco.
1991	Abex; Bendix Corp. - Friction Materials Division; Jurid; Valeo; Nuturn.
1992	Abex; Bendix Corp. - Friction Materials Division; Galfer; Nuturn; Valeo.
1993	Abex; Bendix Corp. - Friction Materials Division; Delco;

Galfer; Nuturn.

1994 Bendix Corp. - Friction Materials Division; Delco; Abex; Nuturn; Galfer.

Chrysler has also purchased brakes from Kelsey, Hayes and Wagner. Standard transmission clutch facings were manufactured by Raybestos.

B. The product's trade and/or brand name;

Answer:

See response to Interrogatory 7(a). Further, brake and clutch products would have been installed in Chrysler vehicles or would have been sold as replacement parts. Through the years, Chrysler parts have been sold under the trade names Mopar, Cycle-Weld, and Cycle-Bond.

C. The years during which such activity took place;

Answer:

See response to Interrogatory 7(a) above.

D. Identify the organizational unit of Defendant, or the associated business entity so engaged.

Answer:

See response to Interrogatory 7(a) above.

E. Within the United States was there any geographic limitation which you claim was applicable to each distributor and/or wholesaler (Yes or No)?

If Yes state the geographical area which you claim was applicable to each distributor and/or wholesaler; and

Answer:

No.

F. Whether there was a written distributorship agreement;

Answer:

No.

G. Whether distributorship was exclusive;

Answer:

No.

H. Identify all documents pertaining to the distributor or wholesaler relationship and the custodian thereof;

Answer:

Not applicable.

I. The ratio of sales to distributors compared to direct sales to consumers.

Answer:

Not applicable.

J. List of sales records or shipments to each distributor or wholesaler.

Answer:

Not applicable.

8. Has Defendant at any time, engaged in the rebranding of asbestos containing products, which generic product type has been previously identified in exposure sheets in this circuit, manufactured in whole or in part by an unrelated business entity? If so, please state:

A. The name and address of the unrelated business entity;

B. The product's original trade and/or brand name;

C. Who performed the physical rebranding and where it was accomplished;

D. The years during which such activity took place;

E. Brand name and/or trade name after the product was rebranded;

F. User or seller of the product after rebranding;

G. Identify the organizational unit of Defendant so engaged.

Answer:

Objection to the Interrogatory as vague, overbroad and without reference to the allegations in the Complaint against Chrysler Corporation

Without waiving this objection, this Defendant answers as follows: Products which were manufactured by entities other than Chrysler including brake linings and clutch facing were incorporated into Chrysler vehicles. Additionally, certain parts manufactured by entities other than Chrysler, would be packaged in after-market packages for sale to authorized dealers. See also answer to Interrogatory 7.

9. **Asbestos/Sales to Manufacturer**

Has Defendant at any time, engaged in the sale of asbestos containing products, which generic type has been previously identified in exposure sheets in this circuit, to an unrelated business entity that was engaged in the manufacture of asbestos containing products? If so, please state:

A. The name and address of the unrelated business entity;

B. The product's trade and/or brand name that was sold;

C. The years during which such activity took place;

D. Identify the organizational unit of Defendant so engaged.

E. List each sales office of your asbestos-containing products and for each please state:

(1) Name and address;
(2) Geographical areas for which each sales office was responsible;
(3) Identify all managers and the years during which they served;
(4) Identify all sales personnel and the years during which they served, and describe each person's sales jurisdiction or responsibility;
(5) Identify sales records or shipment records for each sales office and the custodian thereof.

Answer:

Objection, overbroad burdensome and harassing. Additionally, this interrogatory requires Chrysler Corporation to engage in a massive review of each asbestos litigation file ever initiated in the 11th Judicial Circuit, Dade County, Florida.

Subject to and without waiving the foregoing objection, Chrysler states that there are no documents responsive to this request in its possession, custody or control.

10. **Asbestos/Sales to Government or Government Agencies**

Did this Defendant ever sell or cause to be sold any of its asbestos containing products, identified on exposure sheets filed in this circuit, to (1) the United States Government; (2) the United States Air Force; (3) Army Air Force; (4) United States Army; (5) United States Navy; (6) United States Marine Corps; (7) General Service Administration; (8) Department of Defense; or (9) or any other agency operated by the United States Government? If so, please provide the following:

A. The names and last known address of the governmental agency;

B. Whether there was a written contract or sales agreement;

C. Identify all documents pertaining to the governmental contracts or agreements and custodian of said documents;

D. Whether the formula used for the manufacture of the product was the same as the formula used for the manufacture, sale or distribution of the product to non-governmental customers;

E. The extent to which sales to governmental agencies were handled through distributors or wholesalers as opposed to direct sales by Defendant;

F. The extent to which the physical appearance of the product sold or distributed to a governmental agency differed from the physical appearance of the product sold or distributed to non-governmental customers;

G. The extent to which the packaging and/or labeling of the product sold or distributed to a governmental

agency differed from the packaging or labeling of the product sold or distributed to non-governmental customers;

H. Identify Sales and shipment records for each governmental agency and the custodian thereof.

Answer:

Objection, overbroad, burdensome and harassing. Additionally, this interrogatory requires Chrysler Corporation to engage in a massive review of each asbestos litigation file ever initiated in the 11th Judicial Circuit, Dade County, Florida. Further, plaintiff fails to allege facts indicating Timothy Tinker ever served in the military.

Without waiving the foregoing objections, since 1925 there have been sales of Chrysler vehicles, which vehicles contained brakes and clutches, sold to the United States Government.

11. **Asbestos/Sales Through Licensees**

If any of this Defendant's asbestos-containing products which generic product type has been previously identified in exposure sheets in this circuit, reached the consumer through licensees, please provide the following:

A. The name and last known address of licensees;

B. The years each licensee was licensed to sell, distribute or manufacture this Defendant's asbestos-containing products;

C. Within the United States was there any geographic limitation which you claim was applicable to each licensee (Yes or No)?

If Yes state the geographical areas for which each licensee was permitted to sell, manufacture or distribute this Defendant's asbestos-containing products; and

D. Describe the terms and conditions of each licensee agreement entered into between this Defendant and licensee insofar as manufacture, sale, and distribution of asbestos-containing products;

E. List of products each licensee was permitted to sell or manufacture;

F. Identify all documents pertaining to the licensee relationship and the custodian thereof;

G. Whether or not sales to consumers in each area were made exclusively through licensee.

Answer:

Objection, overbroad, burdensome and harassing. Additionally, this interrogatory requires Chrysler Corporation to engage in a massive review of each asbestos litigation file ever initiated in the 11th Judicial Circuit, Dade County, Florida. Further, this interrogatory is unintelligible in the use of the word "licensees."

12. **Asbestos/Facilities**

For the period 1920 to date, or during the period that Defendant mined, manufactured, sold or distributed asbestos containing products, whichever period is less, state the following regarding each facility that was used by you as a mining, milling, manufacturing, processing, distribution or marketing facility for asbestos containing products:

A. The name and address of the building, mine, mill or facility;

B. The inclusive dates the facility was in operation; and,

C. The function of the facility (e.g., manufacturing, warehousing, mine, sales office, etc.)

D. Plant managers and years of management;

E. Name and type of asbestos-containing products manufactured or processed at each facility;

F. Identify shipment records for each facility and the custodian thereof;

G. If asbestos was mined and sold to any other entity besides this Defendant, please provide list of those entities.

Answer:

Objection. This interrogatory is overbroad, harassing, burdensome and without reference to the facts alleged in the Complaint against Chrysler Corporation. Further, as stated previously, Chrysler never mined or milled asbestos.

Without waiving said objections, Chrysler manufactured a portion of the brake linings utilized in Chrysler automobiles, from 1959 to 1988, at Trenton Chemical plant in Michigan. Chrysler never manufactured clutch facing.

13. Answering Defendant's Asbestos Containing Products

Using the format set out below, answer the following interrogatory. The main purpose of this interrogatory is to first, obtain basic information concerning asbestos-related products, which generic product type has been previously identified in exposure sheets in this circuit with which the answering defendant and its associated business entities were involved, and second, to identify the number of "Interrogatory Response Sheets" the answering defendant must complete.

Provide the following information for each asbestos-containing product, which generic product type has been previously identified in exposure sheets in this circuit, with which this answering defendant was involved:

A. The name of the associated business entity so involved;

B. The Product Trade Name of the asbestos product(s) with which the entity was involved (See the definition of "Product Trade Name" at interrogatory number 14(B));

C. The Product Trade Name of the asbestos product(s) with which the entity was involved (See the definition of "Product Trade Name" at interrogatory number 14(B);

D. Identify the inclusive years of each type of product involvement (e.g., If the entity manufactured and distributed the product, list both types of involvement and the years that correspond to such involvement);

Use the following format. Please work through all of the asbestos-containing products with which one associated business entity was involved before working through all of the asbestos-containing products with which a different associated business entity was involved.

Answer:

Objection, overbroad, burdensome and harassing. Additionally, this interrogatory requires Chrysler Corporation to engage in a massive review of each asbestos litigation file ever initiated in the 11th Judicial Circuit, Dade County, Florida. Upon information, Chrysler Corporation has never been required to serve answers to standard asbestos interrogatories in the Eleventh Judicial Circuit prior to this submission. The information sought requires Chrysler Corporation to conduct a complete product historical review of its records and files as pertains to a "generic" product list proffered by Plaintiff(s). This historical review poses great prejudice and significant burden to Chrysler Corporation, an atypical defendant party in Dade County asbestos litigation. Chrysler Corporation re-adopts the objections filed by Caterpillar, Inc.'s Motion to Strike or in the Alternative Objections to Plaintiffs' Master Preliminary Interrogatories and General Motors/Detroit Diesel's Motion to Strike Plaintiffs' Second Set of Interrogatories as pertains to be information sought by Plaintiff(s), herein.

FORMAT

(Repeat this format for each product with which each associated business entity was involved)

	(a) Associated Business Entity	(b) Product Trade Name	(c) Type(s) of Involvement	(d) Years of Each Type of Involvement
EXAMPLE				
	Company Q	*Product E	Manufacturer Distributor Labeler Rebrander	1957-1973 1957-1973 1957-1973 1960-1965
	Company Q	*Product F		

Type(s)
of Involvement

Rebrandee
Labelee

(d)
Years of Each
Type of Involvement

1953-1962
1957-1973

(a)
Associated
Business Entity

Company R

(b)
Product
Trade Name

*Product E

(c)
Type(s)
of Involvement

Rebrandee

(d)
Years of Each
Type of Involvement

1960-1965

* Note that if different entities are involved with the same asbestos-containing products the asbestos-containing product is to be addressed in the responses of each such business entity, including the answering defendant if applicable.

14. **Product Information**

Following this page is a proposed "Interrogatory Response Sheet" and definitions, examples and instructions dealing with the completion of this question.

For each and ever asbestos-containing product, which generic product type has been previously identified in exposure sheets in this circuit, with which you were involved, as previously identified in responding to the previous interrogatory, please answer the following.

A separate response is to be provided to this question for each and every asbestos-containing product with which the responding defendant was involved.

If different entities were involved with the same asbestos-containing products the asbestos-containing product is to be addressed in a response to this question for each such business entity, including the answering defendant if applicable.

*For example if pipe covering is a generic product type that has been previously identified in exposure sheets filed in this circuit, then the answering defendant is to provide information regarding all types of pipe covering manufactured, sold and/or distributed by defendant regardless of whether a specific types of pipe covering /manufactured, distributed and/or sold by defendant has been identified in exposure sheets in prior litigation in this circuit. In contrast if ironing board covers are a product that have not been identified in exposure sheets filed in this circuit then the defendant need not provide information regarding this product type.

Answer:

Objection, overbroad, burdensome and harassing.

Additionally, this interrogatory requires Chrysler Corporation to engage in a massive review of each asbestos litigation file ever initiated in the 11th Judicial Circuit, Dade County, Florida. Upon information, Chrysler Corporation has never been required to serve answers to standard asbestos interrogatories in the Eleventh Judicial Circuit prior to this submission. The information sought requires Chrysler Corporation to conduct a complete product historical review of its records and files as pertains to a "generic" product list proffered by Plaintiff(s). This historical review poses great prejudice and significant burden to Chrysler Corporation, an atypical defendant party in Dade County asbestos litigation. Chrysler Corporation re-adopts the objections filed by Caterpillar, Inc.'s Motion to Strike or in the Alternative Objections to Plaintiffs' Master Preliminary Interrogatories and General Motors/Detroit Diesel's Motion to Strike Plaintiffs' Second Set of Interrogatories as pertains to be information sought by Plaintiff(s), herein.

INTERROGATORY RESPONSE SHEET

A. Associated Business Entity _____

B. Product Trade Name _____

C. Product Generic Name _____

D. Generic Product Type _____

E. Product Involvement(s) _____

F. (1) Approximate Asbestos Content By Weight _____ to _____

Type of Asbestos by % _____

(2) Approximate Asbestos Content By Volume _____ to _____

Type of Asbestos by % _____

G. Product Years ____|____ ____|____ ____|____ ____|____

H. Intended Uses _____

I. Manufacturing Sites _____|____

_____|____

_____|____

_____|____

_____|____

J. Sizes _____ to _____

K. Product Color(s) _____ _____ _____ _____

L. Product Packaging _____ _____ _____ _____ _____

M. Geographic Limitation (Yes/No)? ____

If Yes, Shipments:

Shipments:

Northeast ___ ___ ___ ___ ___ ___ ___
MA NH ME NY VT RI CT

Mideast ___ ___ ___ ___
OH VA WV KY

Southeast ___ ___ ___ ___ ___ ___ ___
FL NC SC TN AL GA MS

Southwest ___ ___ ___ ___ ___ ___ ___ ___
TX CO NM UT AR AZ LA OK

Midwest ___ ___ ___ ___ ___ ___ ___ ___ ___ ___ ___ ___
MI IL IN MO WI MN ND SD WY NB KA IA

West ___ ___ ___ ___ ___ ___ ___ ___
CA NV OR ID WA MT HI AK

East ___ ___ ___ ___ ___
PA DE NJ MD DC

Other ___ ___ ___
VI GU PR

N. Product Literature _____

O. Product Picture(s) _____

P. Package Picture(s) _____

Q. Product Sample _____

R. Trademark Name(s) _____ _____

S. Patent Number(s) _____ _____

T. Product Alteration _____

A. **Associated Business Entity** _____

Definition:

The name of the business entity as identified in the previous Interrogatory that had any involvement (as defined in Subpart E) with the asbestos-containing product.

Example:

Associated Business Entity The Ruberiod Co.
Associated Business Entity Baldwin-Hill Company
Associated Business Entity None

Instructions:

Complete this interrogatory with the name of an Associated Business Entity that corresponds to this product as disclosed in the previous Interrogatory. Where the answering defendant, rather than an Associated Business Entity, was involved with this asbestos-containing product, type "none" on this line.

B. **Product Trade Name** _____

Definition:

The full name of the asbestos-containing product by which it was marketed. Generally, this would be the name of the product as it appeared on the product, its packaging or its promotional material. Where all, or part of the product name is trademarked, the name should be included in the product trade name.

Instructions:

Where a product trade name represents more than one product, or a line of products, complete separate "interrogatory Response Sheets" for each such product to the extent reasonable and necessary so as to provide as much information as possible regarding each such product or product line. Where information concerning more than one product or a product line is condensed on one "Interrogatory Response Sheet," explain, on a separate sheet of paper why you did so.

Examples:

Product Trade Name BEH Super Powerhouse Cement
Product Trade Name Gold Bond Asbestone Economy 250
Product Trade Name K-Fac Insulation Blocks
Product Trade Name Armstrong Accobest AS-8073
Product Trade Name Armstrong Accobest AS-474

Further Instructions:

Where the product name is "generic," that is, it does not have a trade name by which it was sold, then list the product's generic name but preface the generic name with the name of the entity most closely associated with that generic. The entity most closely associated with that product would be the entity's name that would appear with the product, product package, or product promotional literature.

If no such association exists, then the name of the /manufacturer of that generic product should be used.

Further Examples:

Product Trade Name Ruberoid Asphalt Saturated Asbestos Weatherproof Jacket

Product Trade Name Amatex Asbestos Woven Tape
Product Trade Name Armstrong Perforated Asbestos Board
Product Trade Name Celotex Perforated Asbestos Board

C. **Product Generic Name** _____

Definition:

The name by which this type or species of product was routinely called. Generally, this name would be the generic name of a product (without the name of the entity most closely associated with that generic product).

Examples:

Product Trade Name Careystone Asbestos-Cement Siding
Product Generic Name Asbestos Cement Siding

Product Trade Name Gold Bond Asbestone Economy 250
Product Generic Name Corrugated Siding and Roofing

Product Trade Name K-Fac Insulation Block
Product Generic Name Insulation Block

Product Trade Name Armstrong Perforated Asbestos Board
Product Generic Name Perforated Asbestos Board

D. **Generic Product Type** _____

Definition:

Product Generic Name Insulating Cement
Product Category Cement

Product Generic Name Corrugated Siding and Roofing
Product Category Roofing/Siding

Product Generic Name Hi-temp Block
Product Category Block

Product Generic Name Perforated Asbestos Board
Product Category Board

Further Instructions:

To the extent reasonable, the following categories of products should be used. Where a product fits as readily in one category as another (e.g., corrugated siding and roofing), both categories can be listed as is shown above.

CATEGORIES

AdhesivesCement SheetsFrictionPaperTalcAutomotive BrakeCement ShinglesGasketsPipe CoveringTapeAutomotive ClutchClothHome UsePlasterTextilesBlockClothingHot topsRefractoryWallboardBoardCordLumberRollboardWall CoveringBoiler CementCork ProductsMillboardRoofingWickCableElectrical ProductsNon Automotive BrakeRopeWireCementFeltsNon Automotive ClutchSidingCement BoardFiberPackingSpray MaterialsCement PipeFloor TilePaintSpeckling

If none of the above categories are appropriate, note "other" and use your own words to describe the category of product.

E. **Product Involvement(s)** _____

Definition:

Any involvement, association, or relationship you had with an asbestos-containing product as a miner of asbestos, manufacturer of an asbestos-containing product, seller of an asbestos-containing product, distributor of an asbestos-containing product, rebrander of an asbestos-containing product, rebrandee of an asbestos-containing product, labeler of an asbestos-containing product, labelee of an asbestos-containing product, or some other relationship.

Further Definitions:

A miner of an asbestos-containing product is any entity that takes asbestos from the earth for commercial sale or distribution.

A manufacturer of an asbestos-containing product is any entity that manufactures any product that incorporate asbestos into that product, or who in any way processes or packages asbestos or an asbestos-containing product.

A distributor of an asbestos-containing product is any entity who ships or in any way directs shipments of an asbestos-containing product.

A rebrander of an asbestos-containing product is any entity that manufacturers process, or packages asbestos or an asbestos-containing product but which places the name of another entity or the name of a product with which another entity is involved on that product or product package.

A rebrandee of an asbestos-containing product is any entity for which asbestos or an asbestos-containing product is manufactured, processed, or packaged by another entity, which

other entity places the name of the rebrandee or the name of a product with which the rebrandee is involved on the product or product package.

A labeler of asbestos or an asbestos-containing product is any entity that places its business name anywhere on an asbestos-containing product or package that it manufactures, distributes, sells or rebrands for itself or any entity.

A labelee of asbestos or an asbestos-containing product is any entity for who its business name is placed anywhere on an asbestos-containing product or package that is manufactured, sold, or rebranded by any entity.

Some other association or relationship with an asbestos-containing product other than as a miner, manufacturer, distributor, rebrander, rebrandee, labeler or labelee.

Instructions:

For each asbestos-containing product with which you were in any way involved, indicate the type or types of relationships you had at any time with that product, noting on line E the code or codes for such relationship. These involvements should be the same as were listed in the previous interrogatory.

Use the following codes:

Miner (Mr)	Rebrander (Rr)	Labeler (Lr)
Distributor (Dr)		
Manufacturer (Mf)	Rebrandee (Re)	Labelee (Le)

Other (To)

Examples:

Product Involvements Mf Rf Lr Dr

Product Involvements Dr

F. (1) Approximate Asbestos Content by Weight _____ to _ _____

Type of Asbestos by % _____

Definition:

The usual weight of the asbestos in the product divided by the total weight of the product expressed as a percent. Additionally, provide a listing of all types of asbestos, including contaminants found in the product, as supplied to end users and for each type provide the percentage by weight of each type per unit of product.

Instructions:

Where the asbestos content has varied to any significant degree over time in a particular product, indicate the range of asbestos content in the appropriate section of the answer. If little change occurred over time, write "N/A" in those sections.

In the first part of the answer, whether or not the asbestos content varied, indicate what you believe would be the usual, most representative content over time. In the second part of the answer, note the range of asbestos content over time.

When stating the percent of asbestos by weight, exclude any water added as part of the formulation and in application of the product.

Use the following two letter codes when responding to this interrogatory:?

- **Cv** for crysotile
- **Am** for amosite
- **Cr** for crocidolite
- **Tr** for tremolite

- To for any other type of asbestos
- N/A for not applicable

Example:

Approximate Asbestos Content by weight 10% | N/A to N/A
Approximate Asbestos Content by weight 10% | 3% to 12%

Type of Asbestos by % Cv - 10%, Tr - 1%

(2) Appropriate Asbestos Content by Volume _____|____ to ___

Type of Asbestos by % _____

Definition:

The usual volume of the asbestos in the product divided by the total volume of the product expressed as a percent. Additionally, provide a listing of all types of asbestos, including contaminants found in the product as supplied to end users and for each type provide the percentage by volume of each type per unit of product.

G. **Product Years** _____ _____ _____ ___

Definition:

Inclusive dates of all types of involvement with the asbestos-containing product, expressed in years.

Instructions:

Indicate in the first half of the space, the year you, or the relevant associated business entity first became involved with the asbestos-containing product. On the second half of the space, indicate the last year of involvement with that asbestos-containing product.

If the involvement with the asbestos-containing product was not continuous through all years, use the additional spaces provided to represent such years of involvement.

If the involvement with an asbestos-containing product lasted for only one year or part of one year, note the same year in both halves of the space. If the involvement continues to this time, note "P" for present in the appropriate space.

Type: N/A | N/A (not applicable) on any unused spaces.

Example:

Product Years 1948 | 1972 1975 | 1975 N/A | N/A N/A | N/A
Product Years 1936 | 1953 1955 | 1963 1966 | 1970 1972| P

H. **Intended Uses** _____

Definition:

Provide any limitations on the intended use of the product, including the temperature ranges for which the product was recommended.

H. Intended Uses

Definition:

Provide any limitations on the intended use of the product, including the temperature ranges for which the product was recommended.

I. Manufacturing Sites: _____ _____

_____ _____

Definition:

All locations and time periods at and during which the product was manufactured during your involvement with the product.

Instructions:

On the first half of the line indicate the city and state, or city and province or the like, at which the product was manufactured.

On the second half of the line, indicate the inclusive years of manufacture.

Example:

Manufacturing Sites Norfolk, VA | 1940-1970

Manufacturing Sites Milwaukee, WI | 1962-1969
Peoria, IL | 1967-1973

Manufacturing Sites Glendale, IL | 1967-1970
Glendale, IL | 1972 1976

Manufacturing Sites Conrad, UT | 1936-1942
Ida, IL | 1942-1950
Ida, IL | 1952-1969

J. **Sizes** _____ to _____

Definition:

The generally produced sizes and shapes of the product as sold to the end user, noting the smallest to the largest standard sizes. Respond additionally to this interrogatory by providing information as to the packaging of the product when providing information regarding the product's size. (e.g. 25-75 lb. bags of cement, etc.)

Instructions:

In completing this information, note the smallest standard sizes or weights first, then the largest standard sizes or weights.

Use the following abbreviations as appropriate.

- "C" for circumference
- "D" for diameter
- "G" for gauge
- "H" for height
- "L" for length
- "P" for pounds
- "T" for thickness
- "W" for width

If the suggested abbreviations are inappropriate, type out the most useful size or weight description on the spaces provided or on a separate sheet of paper, identifying that entry as "Interrogatory Response (14)(J), Sizes" and attach that sheet to the Interrogatory Response Sheet.

Examples:

Sizes D2", L12", T1/2" to D24", L48", T2"
Sizes 10 P sacks to 100 P sacks

K. **Product Color(s)** ____|____ ____|____ ____|____ ____|____

Definition:

The basic color(s) of the product. Where the product line had the same basic product in a variety of colors, the five most popular colors or color combinations.

Instructions:

A piece of product may be single-colored or multi-colored. Different pieces of the same product may be designed to show different colors (e.g., floor tile) or the color may have changed from time to time. The above lines are to be completed as follows:

- If the product was the one color, complete the first half of the first line only. Note: "N/A" on the second half of the lines, and N/A | N/A on all other lines.

- If the product was one color, but that color changed from time to time, complete the first half of as many lines as there were color changes (up to five). Note: "N/A" on the second half of the lines, and N/A | N/A on all other lines.

- If the product line included multi-colored pieces indicate the two most prominent colors by using both sides of the line. Up to five multi-colored products can be noted.

- If there were more than five colors or five color combinations, note the most frequently made color(s).

- Try to limit your responses by using the following colors. Use the two-letter codes provided. Generally, do not separately identify shades of the same color. If the

following colors are inadequate to describe a product color, type in what you believe is the proper color name(s).

- Gray (Gy)	- Blue (Bl)	- Brown (Br)
- Black (Bk)	- Violet (Vt)	- Yellow (Yw)
- White (Wh)	- Green (Gr)	- Orange (Or)
- Red (Rd)	- Pink (Pk)	- Tan (Tn)

Example:

Product Color(s) Gy|N/A Bk|N/A Wh|N/A N/A|N/A N/A|N/A
Product Color(s) Gy|Bk Bk|N/A N/A|N/A N/A|N/A N/A|N/A
Product Color(s) Wh|Rd Wh|Bk Wh|Bl Wh|Yw Wh|Or

L. **Product Packaging** _____

Definition:

The most frequently used containers in which the product was packaged.

Instructions:

To the extent possible, use the following codes as set forth below in responding to this interrogatory. Where no code is applicable, type the kind of container or packaging. Provide up to five types of containers, listing where known, the most frequently used container first, second most frequently used container, next, etc. Type N/A on any unused line.

Cardboard box (CB)	Metal drum (MD)	Burlap sack (BS)
Wooden box (WB)	Cardboard drum (CD)	Cloth sack (CS)
Plastic box (PB)	Plastic drum (PD)	Paper sack (PS)
Other box (OB)	Other drum (OD)	Plastic sack (KS)
Bound bundles (BB)	Pallets (PT)	Other sack (OS)
Wooden spools (WL)	Paper spools (PL)	Plastic spools (PL)
Other spools (OL)		

Example:

Product Packaging	CB	WB	N/A	N/A	N/A	
Product Packaging	CD	N/A	N/A	N/A	N/A	
Product Packaging	CS	KS	PS	OS	N/A	N/A

M. Within the United States was there any geographic limitation which you claim was applicable to the sale of this product (Yes or No)?

Geographic Limitation (Yes/No)? ____

If Yes, state the geographical area which you claim was applicable to this product.

Shipments:

Northeast ___ ___ ___ ___ ___ ___ ___
MA NH ME NY VT RI CT

Mideast ___ ___ ___ ___
OH VA WV KY

Southeast ___ ___ ___ ___ ___ ___ ___
FL NC SC TN AL GA MS

Southwest ___ ___ ___ ___ ___ ___ ___ ___
TX CO NM UT AR AZ LA OK

Midwest ___ ___ ___ ___ ___ ___ ___ ___ ___ ___ ___ ___
MI IL IN MO WI MN ND SD WY NB KA IA

West ___ ___ ___ ___ ___ ___ ___ ___
CA NV OR ID WA MT HI AK

East ___ ___ ___ ___ ___
PA DE NJ MD DC

Other ___ ___ ___
VI GU PR

Definition:

Identify those states, possessions, etc. to which your product was ever shipped, was never shipped or it is unknown to you as to whether your product was ever shipped there, if you claim a geographical limitation.

Instructions:

Identify those areas to which you know any product was ever shipped by marking an X on the appropriate line for that state, territory, etc.

Identify those areas to which you know any product was never shipped by marking an O on the appropriate line for that state, territory, etc.

Identify those areas about which you have no information as to whether any product was ever shipped by marking a "?" on the appropriate line for that state, territory, etc.

"Other" means any geographical area not identified by the prior abbreviations.

Example:

Shipments:

Northeast	X	X	X	X	X	X	X					
	MA	NH	ME	NY	VT	RI	CT					
Mideast	X	X	X	X								
	OH	VA	WV	KY								
Southeast	X	X	X	X	X	X	X					
	FL	NC	SC	TN	AL	GA	MS					
Southwest	X	X	X	X	X	X	?	X				
	TX	CO	NM	UT	AR	AZ	LA	OK				
Midwest	O	O	O	O	?	?	?	?	O	O	O	O
	MI	IL	IN	MO	WI	MN	ND	SD	WY	NB	KA	A
West	O	O	O	O	O	O	?	?				
	CA	NV	OR	ID	WA	MT	HI	AK				
East	X	X	X	X	?							
	PA	DE	NJ	MD	DC							
Other	O	O	O	X								
	VI	GU	PR	OTHER								

N. **Product Literature** _____

Definition:

Whether or not you have any product literature of any sort (e.g., promotional literature, ads, catalogue entries, books, etc.) that describes or pictures this product, yes or no.

Examples:

Product Literature Yes

Product Literature No

O. **Product Picture(s)** _____

Definition:

Whether or not you have care, custody or control over any depictions of this product, and if so, the type of depiction(s).

Instructions:

If you have no depictions of this product, answer "no" in the space provided.

If you do have depictions of this product, indicate the types of depictions you have. Use the following codes and indicate for each type of depiction whether it is a:

- Color Picture (CP)
- Color Sketch (CS)
- Black & White Sketch (BS)
- Blueprint (BT)
- Black & White Picture (BW)
- Photocopy (PC)
- Other (TO)

Examples:

Product Picture(s) No

Product Picture(s) BT

Product Picture(s) CP BT BW PC TO

P. **Package Picture(s)** _____

Definition:

Whether or not you have any depictions of the product packaging and if so, the type of depictions.

Instructions:

If you have no depictions of this product, answer "no" in the space provided.

If you do have depictions of this product, indicate the types of depictions you have. Use the following codes and indicate for each type of depiction whether it is a:

- Color Picture (CP)
- Color Sketch (CS)
- Black & White Sketch (BS)
- Blueprint (BT)
- Black & White Picture (BW)
- Photocopy (PC)
- Other (TO)

Examples:

Product Picture(s) No

Product Picture(s) BT

Product Picture(s) CP BT BW PC TO

Q. **Product Sample** _____

Definition:

Whether or not you have one or more samples of the asbestos-containing products, yes or no.

Example:

Product Sample Yes
Product Sample No

R. **Trademark Name(s)** _____ _____

Definition:

The name of any trademark(s) in any way associated with the product, product packaging, or product literature.

Instructions:

If more than one Trademark is associated with the name of a product (e.g., Gold Bond Ripple-Tone Panels), provide the requested information for each trademark.

Type N/A on any unused lines.

Examples:

Trademark Name(s) Perf-A-Tape N/A

Trademark Name(s) Gold Bond Ripple Tone

S. **Patent Number(s)** _____ _____

Definition:

The Patent Number(s) of any product or process in any way related to the product itself.

Instructions:

To the extent more than one patent is involved with the product itself, or the manufacture, sale, processing, development, etc. of the product, note the additional patent number on the additional line provided.

Type N/A on any unused lines.

Examples:

Patent Number(s) 3.660.148 N/A

Patent Number(s) 2.573.659 2.529.175

T. **Product Alteration** _____

Definition:

State whether the product has been altered in chemical composition since first being made. If so, please state as to each such alteration:

i. The date of the alteration;

ii. The nature of the alteration;

iii. The reason for the alteration;

iv. Identify the person(s) recommending or approving such alteration; and

v. Whether there are any studies, evaluations or tests made in connection with the alteration, and if so, identify each such study.

15. **Asbestos Free Products**

For each asbestos containing product whose trade name is listed in Answer No. 14, state:

A. Was the product, or a substitute for that product, ever manufactured and/or sold by you without asbestos; if so, when did the sale of the product commence;

B. Brand name of the asbestos free product;

C. The reason product was manufactured without asbestos;

D. Was the asbestos-containing counterpart of said product sold while the asbestos-free counterpart was being manufactured; if so, provide the time periods;

Answer:

Objection, overbroad, burdensome and harassing. Additionally, this interrogatory requires Chrysler Corporation to engage in a massive review of each asbestos litigation file ever initiated in the 11th Judicial Circuit, Dade County, Florida. Upon information, Chrysler Corporation has never been required to serve answers to standard asbestos interrogatories in the Eleventh Judicial Circuit prior to this submission. The information sought requires Chrysler Corporation to conduct a complete product historical review of its records and files as pertains to a "generic" product list proffered by Plaintiff(s). This historical review poses great prejudice and significant burden to Chrysler Corporation, an atypical defendant party in Dade County asbestos litigation. Chrysler Corporation re-adopts the objections filed by Caterpillar, Inc.'s Motion to Strike or in the

Alternative Objections to Plaintiffs' Master Preliminary Interrogatories and General Motors/Detroit Diesel's Motion to Strike Plaintiffs' Second Set of Interrogatories as pertains to be information sought by Plaintiff(s), herein.

16. **Product Development/Design**

For each asbestos product referred to in Answer No. 14, or which was sold to any other defendant, state separately:

A. Was the product manufactured or sold to any entity prior to its being placed on the commercial market;

B. The date and place where the product was designed and developed;

C. The identity and last known address of the person or persons responsible for the design or development of the product;

D. Was she product ever tested prior to its being sold for use by the consumer? If so, provide the identity and present location of all records dealing with these tests (including testing concerning use, application, durability, toxicity, etc.) and the custodian of said records.

Answer:

Objection, overbroad, burdensome and harassing. Additionally, this interrogatory requires Chrysler Corporation to engage in a massive review of each asbestos litigation file ever initiated in the 11th Judicial Circuit, Dade County, Florida. Upon information, Chrysler Corporation has never been required to serve answers to standard asbestos interrogatories in the Eleventh Judicial Circuit prior to this submission. The information sought requires Chrysler Corporation to conduct a complete product historical review of its records and files as pertains to a "generic" product list proffered by Plaintiff(s). This historical review poses great prejudice and significant burden to

Chrysler Corporation, an atypical defendant party in Dade County asbestos litigation. Chrysler Corporation re-adopts the objections filed by Caterpillar, Inc.'s Motion to Strike or in the Alternative Objections to Plaintiffs' Master Preliminary Interrogatories and General Motors/Detroit Diesel's Motion to Strike Plaintiffs' Second Set of Interrogatories as pertains to be information sought by Plaintiff(s), herein.

17. **Sales Documents**

Please state whether you have any documents of any kind indicating or reflecting past sales of one or more asbestos-containing products listed in response to interrogatory 14, including, but not limited to, invoices, orders, purchase records, sales records, confirmations, bills of lading, annual or other periodic summaries of sales or orders, accounts payable or accounts receivable records, etc. If so, describe in detail the different types of documents that you have for each such asbestos-containing product, and state the following as to each type of document:

A. The items of information contained on it (e.g., date of sale, product, quantity, purchaser, shipment location, price, etc.);

B. The years of sale encompassed by documents still in existence;

C. The current location of the documents;

D. Identify the current custodian of the documents, as well as the current employee most familiar with the codes or system used on the documents.

Answer:

Objection, overbroad, burdensome and harassing. Additionally, this interrogatory requires Chrysler Corporation to engage in a massive review of each asbestos litigation file ever initiated in the 11th Judicial Circuit, Dade County, Florida. Upon information, Chrysler Corporation has never been required to serve answers to standard asbestos interrogatories in the Eleventh Judicial Circuit prior to this submission. The information sought requires Chrysler Corporation to conduct a

complete product historical review of its records and files as pertains to a "generic" product list proffered by Plaintiff(s). This historical review poses great prejudice and significant burden to Chrysler Corporation, an atypical defendant party in Dade County asbestos litigation. Chrysler Corporation re-adopts the objections filed by Caterpillar, Inc.'s Motion to Strike or in the Alternative Objections to Plaintiffs' Master Preliminary Interrogatories and General Motors/Detroit Diesel's Motion to Strike Plaintiffs' Second Set of Interrogatories as pertains to be information sought by Plaintiff(s), herein.

18. **Sales Office**

Did you ever have any sales offices in Florida that were responsible for distribution and/or sales of asbestos and/or asbestos containing products listed in responding to interrogatory 14? If so, please state as to each such sales office;

A. Its address and years of operation;

B. Identify all managers from 1930 through the present and the years during which they were served;

Answer:

Objection. This interrogatory is overbroad without reference to the allegations against Chrysler Corporation. Without waiving said objections, Chrysler Corporation has submitted to the personal jurisdiction of this Court with regard to this litigation and Chrysler has authorized automobile dealerships in the State of Florida.

19. **Fiber Purchases**

Please state the name and address of each business entity from whom the Defendant, Defendant's predecessors, Defendant's subsidiaries have ever bought or received raw asbestos fiber.

Answer:

Chrysler did not design and/or develop all brake linings that it sold from 1959 to 1988. In addition to manufacturing brake linings, Chrysler purchased brake linings from other manufacturers. See response to Interrogatory 7.

Subject to and without waiving the foregoing objections, Chrysler manufactured brake linings beginning in 1959. During the time of manufacture of brake linings, Chrysler purchased chrysotile asbestos fiber from Asbestos Corporation, Limited, 830 Mooney Street, Bentford Mines, Quebec, Canada G6651; Carry Canadian, P. O. Box 190, East Braughton Station PQ Canada GONIHO; Johns-Manville, P. O. Box 5108, Ken Caryl Ranch, Denver, Colorado 80217. A minor supplier of raw asbestos was Lake Asbestos.

20. **Insurance**

For all policies of insurance affording general liability or product liability coverage, including primary policies, excess policies, policies of reinsurance, program of self-insured retention (SIR) and/or policies in which defendant was additionally insured, applicable to injuries allegedly caused by exposure to asbestos and/or asbestos containing products state:

A. Insurer: Specify exactly as named in the insurance policy or other evidentiary document coverage.

B. Insured: The insured named in the policy.

C. Policy Period: Refer to the actual period for which the insurance policy is and/or was in effect.

D. Policy Type: Specify whether primary, excess or self-insured, etc.

E. Per Occurrence/ Accident Limits: Refer to the limit for any one occurrence or any one accident.

F. Products Aggregate: Refer to the aggregate limit applicable to products bodily injury liability coverage. Certain insurance policies may contain combined aggregate for bodily injury, property damage and other covered perils; if so, refer to the combined limit and so indicate.

G. Products Aggregate Consumption: The function of the Aggregate Consumption Summary is to track the consumption of total products liability aggregate limits claims. List such consumption. If applicable the date upon which the policy limits were paid out in full or exhausted.

H. Policy Number: Specify exactly as contained on the insurance policy or other evidential document of coverage the policy number. Additionally provide the custodian of the policy and/or document.

I. Insurer Objection: Specify the bases upon which the relevant insurer refuses to fully pay claims upon demand. If the insurer has not objected to payment or is paying, note N/A.

Answer:

Objection. The interrogatory is overbroad and without reference to facts set forth in Plaintiff's Complaint. Without waiving its objection, Chrysler Corporation is presently self-insured and has been for years. These may however be certain concurrent coverage with Hartford Insurance Company.

21. **Asbestos Consultant**

Has any person ever served as a consultant (excluding experts retained during the time of litigation), full or part-time, to defendant in any manner regarding the potential medical, toxicological, or industrial hygiene aspects of asbestos or any asbestos containing product? (the term consultant is meant to include any specialist in the above areas who was at least in part retained for his expertise and opinions in other than a full-time salaried position). If so, please state the following as to each such person;

A. Identify the person;

B. The beginning date, ending date, and period of service for the person;

C. The job duties and/or responsibilities for the person, as well as a summary of the work performed;

D. The plant address, office address, or duty assignment location for the person for each part of the consultancy;

E. The reason for retaining the person;

F. Identify the company official responsible for retaining the person, as well as identify the company officials with whom the person met during the period of the employment of consultancy; and,

G. State whether the documents relating to the employment or consultancy in any way, including contracts, correspondence, publications, reports, status reports, studies, etc., exist and whether or not said documents mention asbestos. Additionally if said documents exist provide the name of the records custodian of said documents.

Answer:

Objection. This interrogatory is overbroad, burdensome and without reference to the facts set forth in Plaintiff's Complaint. Without waiving its objection, Chrysler states as follows: Chrysler has retained an industrial hygienist since the mid 1930's. The industrial hygienist was hired since Chrysler felt it was necessary to establish an industrial hygiene department. The industrial hygiene department is located in Highland Park.

22. **Physician/Consultant**

Please state whether or not Defendant ever employed, engaged or retaining any physician as a consultant, plant physician or otherwise (excluding experts retained during the course of litigation), in connection with asbestos-related business activities. If so, please state the following as to each such physician.

A. Identify the physician and give complete dates and places of employment or service;

B. State the physician's duties and responsibilities;

C. Identify the company person to whom the physician reported;

D. State the purpose for which the physician was employed, engaged or retained; and ,

E. State whether documents pertaining to the physician's professional activities involving asbestos and/or individuals exposed to asbestos exist and the custodian of said documents.

Answer:

Objection. This Interrogatory is overbroad, vague and without reference to the facts set forth in Plaintiff's Complaint. Further, the term "physician as a consultant" is not defined. Without waiving its objection, Chrysler states as follows: Chrysler has had medical departments since the mid-1930's. The medical departments provide medical assistance to employees. See also answer to Interrogatory 23.

23. **Safety Consultant**

Please state whether or not any industrial hygienist, toxicologist, safety director, occupational medical director, physician or consultant in any of the foregoing areas previously identified (excluding experts retained during the course of litigation), ever made at any time any statements, recommendations and/or suggestions to the Defendant pertaining to or relating to asbestos or health hazards from dust or any product. If so, state the following as to each such occasion;

A. Identify who made the recommendation and/or suggestion;

B. State the date of the recommendation and/or suggestion;

C. Identify all company officials who receive the recommendation and/or suggestion;

D. State the substance of the recommendation and/or suggestion; and,

E. State whether any documents and/or records of oral conversations embodying or pertaining to the recommendation and/or suggestion exist and if so the custodian of said records.

Answer:

Objection. This interrogatory is overbroad, vague and without reference to the facts set forth in Plaintiff's Complaint. Further, the terms "physician as a consultant", "safety director" and "occupational director" are not defined. See also response to Interrogatory 22.

Without waiving its objection, Chrysler states as follows: Chrysler first hired a medical director in the mid-1930s to develop and implement

corporate medical programs, to provide surveillance, and functional guidance, and to provide assistance to all plant medical departments. A medical director has been assigned to the Highland Park offices of Chrysler. Currently, the medical director is hired by the personnel vice president at Chrysler. Any recommendations made by the medical director with respect to Chrysler employee workers is irrelevant to this lawsuit. The medical director currently reports to the Manager, Occupational Safety, Health and Worker Compensation.

24. **Tests/Asbestos**

Please state whether Defendant ever conducted or caused to be conducted any tests (whether laboratory or field tests) on any of their or anyone else's asbestos-containing products, including measurements of exposure levels during installation, removal and/or after installation after they had degenerated or decomposed from use, to determine potential or likely asbestos exposure levels during conditions of intended use of the product. If so, please state the following as to each such test;

A. Identify the person who directed that the test and/or measurement be made and/or conducted;

B. Identify the person or organization who conducted the test and/or measurement;

C. Identify where, when and for how long the test and/or measurement was conducted, including the department of the plant or facility involved, as well as its owner and operator;

D. State the product(s) tested and describe the conditions of the test, including the measurement methodology;

E. Describe whatever efforts, if any, were used in the test to simulate the various conditions of possible or probable use of the product, such as in confined spaces or tunnels;

F. State the asbestos exposure levels measured including the ranges measured, median measurement and average measurement;

G. Identify to whom the test results were reported; and,

H. Identify all documents pertaining to the test and the

custodian thereof.

Answer:

Objection. This interrogatory is vague, ambiguous and overbroad. Without waiving its objection, based on available corporate records, Mr. L. Gendernalik, a member of the Industrial Hygiene Department of Chrysler Corporation, sampled the air levels in 1972 and 1975. The 1972 sampling was done at Chrysler's brake plant test garage. Two samples of mechanics working on brake drums were taken with a cellulose ester filter. The results were 0.2 fibers per cubic centimeter when compressed air was used. In 1975, Mr. Gendernalik took air samples at Dodge Truck, Inc. in Chicago, Illinois. Counts were taken with the use of cellulose ester filter and the results were 0.0 fibers per cubic centimeter of air.

25. **Financial Support/Measurement/Tests**

Has Defendant ever conducted, caused to be conducted or financially supported through at least a 10% contribution toward s the total cost, any asbestos-related epidemoiolic, toxicologic, animal, medical, scientific tests, reviews, investigations, analysis, research or studies of any king (hereinafter termed "studies")? If so, please state as to each such study:

A. Identify who directed or authorized that the study be done;

B. Identify the person or organization that conducted the study;

C. State the dates and over what time period the study was done;

D. Describe the study design and protocol;

E. State the complete results of the study, including any conclusions or recommendations contained therein;

F. Identify all company officials who received notice of the existence of the study and/or its results;

G. Identify all documents relating to the study and the custodian thereof; and

H. State whether the study was ever published, and if so, state the study title and citation.

Answer:

Chrysler objects to this interrogatory on the grounds that it is vague, ambiguous, overly broad, unduly burdensome, unlimited in time and

scope and improper, because it is not reasonably calculated to lead to the discovery of admissable evidence. Subject to and without waiving the foregoing objection, Chrysler states that there are no documents responsive to this request in its possession, custody or control.

26. **Literature Review**

Has Defendant ever conducted, caused to be conducted, or financed through at least a 10% contribution towards the total cost, any effort to monitor or review the professional literature regarding the clinical, epidemiologic, toxicologic, industrial hygiene, medical and/or scientific aspects of asbestos and/or products containing asbestos (excluding for the purposes of litigation)? If so, please state the following as to each effort:

A. Identify who directed or authorized that the effort be done;

B. Identify the person or organization that conducted the effort;

C. State the dates and over what time period the effort was done;

D. Describe the effort design and protocol;

E. State the complete results of the effort, including any conclusions or recommendations contained therein;

F. Identify all company officials who received notice of the existence of the effort and/or its results;

G. Identify all documents relating to the effort and the custodian thereof; and,

H. State whether the effort was ever published, and if so, state the effort title and citation.

Answer:

Chrysler objects to this Interrogatory on the

grounds that it is vague, ambiguous, overly broad, unduly burdensome, unlimited in time and scope and improper, because it is not reasonably calculated to lead to the discovery of admissable evidence. Subject to and without waiving the foregoing objection, Chrysler states that there are no documents responsive to this request in its possession, custody or control.

27. **Specific Studies/Participation**

Did Defendant at any time in any way participate in any of Metropolitan Life Insurance Company's studies of 2asbestos (conducted approximately between 1929-1940), any Trudeau Foundation/Saranac Lake studies (between 1929-1960), or any Industrial Hygiene Foundation studies (between 1938-1968)? If so, identify each such study in which you were involved and state as to each:

A. What role or action you took in regard to the study;

B. Identify all documents related to your involvement in the study and the custodian thereof;

C. Identify each of your facilities in which any part of the study was conducted and reference your facility to the data reported in the study; and,

D. Identify each of your officers, supervisors, managers or employees who assisted, participated in or directed your involvement in the study.

Answer:

To Chrysler's knowledge it did not participate in nor does it have any information regarding Metropolitan Life Insurance studies.

To Chrysler's knowledge it did not participate in nor does it have any information regarding Saranac Lake Laboratories studies.

With respect to the Industrial Hygiene Foundation, to answer this question would require making inquiry of every Chrysler Corporation employee, past or present, which

would be impossible. To Chrysler's present knowledge, it appears that Chrysler was a member of IHF from 1965 to 1970, and from 1974 to 1978. However, to Chrysler's knowledge at this time, no funding for studies was provided to the Industrial Hygiene Foundation.

28. **Asbestos Hazard/Notice**

Did Defendant at any time prior to 1980 receive, have notice of, acquire or possess any advice, publication, statement, warning, order, directive, letter, memorandum, recommendation or document, written or oral, in any way related to asbestos and health hazards, or which implicitly or explicitly refers to asbestos and health issues. If so, state the following as to each such document and oral conversation, and each such occasion prior to 1980:

A. When any of this knowledge was first acquired, how it was acquired, identify by whom it was acquired, and state the substance of the knowledge acquired.

B. Identify all documents pertaining to the advice, publication, statement, warning, order, directive, letter, memorandum, or recommendation and the custodian thereof;

C. Identify all company officials and directors who received notice of the existence of the document or oral conversation. For each such oral conversation state the approximate date of said conversation and the parties to said conversation; and,

D. What action, if any, was taken by you as a consequence of the document or oral conversation.

Answer:

Objection. Chrysler Corporation objects to this interrogatory as overbroad, burdensome and calls for a scientific and/or medical conclusion that Chrysler is not required to provide. This interrogatory improperly assumes that there is or might be adverse health effects associated with the use of chrysotile asbestos. Consequentially, answering Defendant cannot respond

to the interrogatory in its present form. Additionally, the interrogatory is designed to elicit a response that maybe used in a misleading manner at the time of trial rather than the discovery factual information. Chrysler does not acknowledge a causal relationship between exposure to brake dust or clutch facing dust and any diseased illness. Chrysler was, however, aware in the 1930's that certain types of raw asbestos could cause pulmonary disease when inhaled in large quantities. Notably, chrysotile asbestos used in friction products is a different type of asbestos than the types involved in insulation products.

Furthermore, there is considerable data concerning the lack of toxicity of brake dust in that asbestos and friction products undergo tremendous heat and friction which transforms the asbestos into nontoxic substances. Moreover, the nature and exposure to brake dust normally is intermittent and involves only exposure to very minute quantities of dust, which contain no significant asbestos. Chrysler unequivocally denies that there exists today any medical or scientific knowledge that establishes risks associated with exposure to its friction products.

29. **Knowledge/Asbestosis**

Please state whether Defendant obtained, prior to 1980, any knowledge concerning the association, if any, between the inhalation of asbestos fibers and a lung disease known as asbestosis, in users, consumers and/or persons exposed to asbestos and/or asbestos containing products. If so, please state:

A. When any of this knowledge was first acquired, how it was acquired, identify by whom it was acquired, and state the substance of the knowledge acquired;

B. As to each such occasion thereafter in which your knowledge as to asbestosis increased either relative to the types of exposures (i.e. trades and occupations, etc.) and/or types of products which became associated with the development of asbestosis state:

(1) when was this additional knowledge acquired;

(2) how was this additional knowledge acquired;

(3) identify by whom it was acquired;

(4) state the substance of the additional knowledge acquired;

C. Identify all documents relevant to your acquisition of knowledge concerning the disease asbestosis and the custodian thereof; and,

D. If any of the foregoing knowledge was acquired through an oral conversation, identify each such oral conversation, the approximate date of said conversation and the parties to said conversation.

Answer:

See Answer to Interrogatory Number 28.

30. **Knowledge/Lung Cancer**

Please state whether Defendant, prior to 1980, ever obtained any knowledge concerning the association, if any, between the inhalation of asbestos fibers and lung cancer, in users, consumers and/or persons exposed to asbestos and/or asbestos containing products. If so, please state:

A. When any of this knowledge was first acquired, how it was acquired, identify by whom it was acquired, and state the substance of the knowledge acquired.

B. As to each such occasion thereafter in which your knowledge as to lung cancer increased either relative to the types of exposures (i.e. trades and occupations, etc.) and /or types of products which became associated with the development of lung cancer state:

(1) when was this additional knowledge acquired;

(2) how was this additional knowledge acquired;

(3) identify by whom it was acquired;

(4) state the substance of the additional knowledge acquired;

C. Identify all documents relevant to your acquisition of knowledge concerning lung cancer and the custodian thereof; and,

D. If any of the foregoing knowledge was acquired through an oral conversation, identify each such oral conversation, the approximate date of said conversation and the parties to said conversation.

Answer:

See Answer to Interrogatory Number 28.

31. **Knowledge/Mesothelioma**

Please state whether Defendant, prior to 1980, ever obtained any knowledge concerning the association, if any, between the inhalation of asbestos fibers and mesothelioma, in users, consumers and/or persons exposed to asbestos and/or asbestos containing products. If so, please state:

A. When any of this knowledge was first acquired, how it was acquired, identify by whom it was acquired, and state the substance of the knowledge acquired.

B. As to each such occasion thereafter in which your knowledge as to mesothelioma increased either relative to the types of exposures (i.e. trades and occupations, etc.) and/or types of products which became associated with the development of mesothelioma state:

(1) when was this additional knowledge acquired;

(2) how was this additional knowledge acquired;

(3) identify by whom it was acquired;

(4) state the substance of the additional knowledge acquired;

C. identify all documents relevant to your acquisition of knowledge concerning mesothelioma and the custodian thereof; and,

D. If any of the foregoing knowledge was acquired through an oral conversation, identify each such oral conversation, the approximate date of said conversation and the parties to said conversation.

Answer:

See Answer to Interrogatory Number 28.

32. **Knowledge/Cancer of the Gastrointestinal Tract**

Please state whether Defendant ever obtained any knowledge concerning the association, if any, between the inhalation of asbestos fibers and cancer of the gastrointestinal tract (i.e. colon, stomach, etc.), in users, consumers and/or persons exposed to asbestos and/or asbestos containing products. If so, please state:

A. When any of this knowledge was first acquired, how it was acquired, identify by whom it was acquired, and state the substance of the knowledge acquired.

B. As to each such occasion thereafter in which your knowledge as to cancer of the gastrointestinal tract increased either relative to the types of exposures (i.e. trades and occupations, etc.) and/or types of products which became associated with the development of cancer of the gastrointestinal tract state:

(1) when was this additional knowledge acquired;

(2) how was this additional knowledge acquired;

(3) identify by whom it was acquired;

(4) state the substance of the additional knowledge acquired;

C. Identify all documents relevant to your acquisition of knowledge concerning cancer of the gastrointestinal tract and the custodian thereof; and,

D. If any of the foregoing knowledge was acquired through an oral conversation, identify each such oral conversation, the approximate date of said conversation and the parties to said conversation.

Answer: **See Answer to Interrogatory Number 28.**

33. **Warning/Description**

Please provide the following information as to each caution, warning or hazard statement or explanation involving asbestos alleged to have been placed on the products or packaging or asbestos containing products by you?

A. What was its precise wording;

B. Where was it located on the product or packaging, and what was the size and color of the lettering;

C. Has the wording or its presentation ever been altered, and if so, how and when;

D. The years during which each version of a caution, warning or hazard statement appeared on each individual product identified in responding to interrogatory 14;

E. Identify all company officers and/or committees who participated in the decision to affix each version of the caution, warning or hazard statement to a product or its packaging, and in particular, identify the prime decision-maker, if any; and

F. Identify all documents related in any way to each caution, warning or hazard statement and the custodian thereof.

Answer:

Objection. Chrysler never manufactured, refined, processed, sold or delivered equipment or loose asbestos fiber.

Plaintiff alleges and this interrogatory assumes or implies that some unspecified warning was necessary with regard to answering defendants products, which Chrysler denies and no

admission is made or intended by responding to this and other interrogatories as drafted. Furthermore, this interrogatory is also objectionable, because it is not confined to the time period at issue, that is, plaintiff's period of employment. Further, in response to these allegations, Chrysler states that no warning was necessary regarding the installation, replacement and/or repair; use of defendant's products will not expose a person to inhalable, intact, chrysotile fibers, of lengths considered to be pathogenic or in amounts which would cause disease.

Without waiving the aforementioned objections, brake linings and clutch facing products have contained warnings.

The first Chrysler service manual containing warnings concerning brake linings was printed in 1973.

The following warning appeared in Chrysler's 1973 service manual:

CAUTION: When resurfacing or refacing brake shoes follow manufacturing recommendations for proper use of their equipment. Whatever equipment is used, ensure that proper ventilation is provided to remove asbestos dust, which can be detrimental to health.

The following warning first appeared in Chrysler's 1984 service manuals regarding brake service:

CAUTION: When servicing brake assemblies or

components, do not create dust by sanding, grinding or by cleaning brake parts with a dry brush or with compressed air. A water dampened cloth should be used. Many brake components contain asbestos fibers which can become airborne if dust is created during service operations. Breathing dust which contains asbestos fibers can cause serious bodily harm.

The following warning appeared in Chrysler's 1984 service manual regarding clutch:

> CAUTION: When servicing clutch assemblies or components do NOT create dust by sanding or by cleaning clutch parts with a dry brush or with compressed air. (A water dampened cloth should be used.) The clutch disc contains "Asbestos Fibers" which can become airborne if dust is created during service operations. Breathing dust containing "Asbestos Fibers" may cause serious bodily harm.

Warnings have been incorporated in service manuals consistently since 1984.

In further response, subject to the foregoing objections, from 1983 to 1987, the cartons for Chrysler asbestos containing replacement parts contained the following warning:

CAUTION

> THIS PRODUCT CONTAINS ASBESTOS. AVOID CREATING DUST. BREATHING ASBESTOS MAY RESULT IN SERIOUS BODILY HARM.

From 1988 to the present, the cartons for Chrysler asbestos containing replacement parts have contained the following warnings:

DANGER

CONTAINS ASBESTOS FIBERS AVOID CREATING DUST CANCER AND LUNG DISEASE HAZARD.

34. **Warning/Insert**

Has Defendant ever placed any form of package insert or informative brochure in a container of an asbestos-containing product, listed in response to interrogatory 14, explaining the hazards of asbestos? If so, state as to each such insert or brochure:

A. When was it first placed in containers and for what years thereafter?

B. What products had the insert or brochure included;

C. Describe the size, shape, color and text of the insert or brochure;

D. Identify all persons involved in the decision to include the insert or brochure; and

E. Identify all company officers and/or committees who participated in the decision to include an insert or brochure, and in particular, identify the prime decision-maker, if any; and

F. Identify the insert and/or brochure itself and the custodian thereof.

Answer:

See Answer to Interrogatory Number 33.

35. **Warning/Customer**

State whether you published and/or otherwise provided any of your distributors and/or customers with any instructions in regard to the asbestos hazards, if any, presented by use of Defendant's asbestos-containing products, other then inserts or labels (i.e. promotional pamphlets, product manuals, specification sheets, sales brochures, etc.) If so, please state:

A. When such instruction were first given;

B. By whom and when were these instructions made;

C. State the specific instructions provided; and

D. Identify all oral communications and documents related to these instructions. If oral identify the approximate date of said communication and the parties involved, if written provide the custodian of said documents.

Answer:

See answer to Interrogatory 33.

36. **Warning/Mask**

Has Defendant ever placed any form of disposable face mask or respiratory in a container of an asbestos-containing product for later use by persons who would handle and/or be exposed to the product? If so, please state:

A. The products covered by the practice;

B. The year this practice began in the years it was implemented;

C. Describe the type of face mask or respirator included in the container; and

D. Identify all oral communications and documents related to this practice. If oral identify the approximate date of said communication and the parties involved, if written provide the custodian of said documents.

Answer:

Objection. This Interrogatory is vague, ambiguous and not likely to lead to the discovery of relevant evidence.

37. **Sales Material**

Has Defendant at any time, published and/or distributed any sales brochures, promotional pamphlets, product manuals, specification sheets or other written sales materials or documents of any kind or character? If so, please:

A. Identify each such document and the custodian thereof;

B. State for what period of time you published and/or distributed sales brochures, promotional pamphlets, product manuals, specification sheets, or other written sales material or documents without any form of warnings, cautions, hazard statements or explanations concerning asbestos.

Answer:

Chrysler objects to this request on the grounds that it is overly broad, not properly limited as to time and scope, and unduly burdensome. Without waiving said objection, Chrysler states that it does not have records of advertisement of after-market products prior to 1987. Additionally, see answer to interrogatory 6.

38. **Advertisement**

If you advertised any of your asbestos-containing products, listed in your response to interrogatory 14, in newspapers, magazines, or other publications at any time from 1930 to the present, please state for each such advertisement that contained a warning regarding your products:

A. The name of the publication in which it appeared, including the date and page number;

B. A complete transcript of the advertisement and a description of any pictures accompanying it;

C. The name and address of the person or agency that was responsible for approving each such advertisement;

D. The name and address of whoever has current custody of the above-described advertising literature; and

E. Identify all documents relating to such advertisements and the custodian thereof.

Answer:

See Objection to Interrogatory Number 14 Incorporated herein. See also answers to Interrogatories 6 and 37.

39. **Product Usage/Documents**

Has any written material of any kind or character been prepared by Defendant or its agents indicating how your asbestos-containing products should be used and/or maintained (other then information in regards to the hazards, if any, presented by use of the defendant's asbestos containing products)? If so, please state as follows:

A. Identify all such material and the custodian thereof;

B. The name, address and job classification of each person who prepared same; and;

C. The dates and manner in which said material was distributed to purchasers of Defendant's products.

Answer:

See Answer to Interrogatory Number 33.

40. **Notice/Asbestos Injury**

Did Defendant receive notice, prior to 1975, that any person was claiming injury as a result of using asbestos-containing products mined, manufactured, sold and/or used by you? If so, please state as to each such claim.

A. The name of the claimant;

B. The date of notice of the claim;

C. A description of the claim including the type of exposure experienced by the claimant (e.g., mining, milling, manufacturing, insulating, etc.);

D. The type of injuries allegedly sustained;

E. The caption and court, address of the court or workers' compensation file number of the claim;

F. Identify all documents relating to the claim and the custodian thereof.

Answer:

Objection. Chrysler objects to this interrogatory on the grounds that it is irrelevant, overbroad, not properly limited as to time and unduly burdensome.

41. Please state whether the Defendant has ever been a member of the following business groups (or group with similar name), and if so, answer the following as to each group;

(1) The address of the group;

(2) The years during which you were a member;

(3) Identify all documents in your possession relating in any way to the group, including documents before, during and after the period of your membership and the custodian thereof.

A. Industrial Health Foundation (or one of its predecessors);

B. Asbestos Textile Institute;

C. Asbestos Information Association of North America;

D. National Mineral Wool Producers Association;

E. Asbestos Cement Pipe Producers Association;

F. Magnesia Insulation Manufactures Association;

G. American Industrial Hygiene Association;

H. Brake Lining Manufactures Association;

I. Friction Materials Standards Institute, Inc.;

J. Asbestos Brake Lining Manufactures Institute;

K. Quebec Asbestos Mining Association;

L. Institute of Occupational and Environmental Health of Quebec Asbestos Mining Association;

M. American Society for Testing and Materials;

N. Grinding Wheel Institute;

O. Trudeau Foundation;

P. National Safety Council;

Q. National Insulation Manufacture Association; and

R. The Refractories Institute;

Answer:

Objection. Chrysler objects to this Interrogatory on the grounds that it is overbroad, unduly burdensome and not properly limited as to time. Answering this Interrogatory would require making inquiry of thousands of Chrysler employees, past and present, which would be unduly burdensome. Without waiving these objections, Chrysler or Chrysler employees, or both, have had memberships in the American Industrial Hygienist Association, The Friction Material Safety Institute, The Industrial Hygiene Foundation, The American Academy of Industrial Hygienist, National Safety Council, The Motor Vehicle Manufactures Association, The Battery Council International, The Society of Automobile Engineers, and The Engineering Society of Detroit. It is also known that Chrysler in the past, has belonged to The Friction Materials Safety Institute and The Motor Vehicle Manufacturers Association.

42. **Library**

Please state whether Defendant ever maintained any form of library or collection of books and publications. If so, state the following as to each such library;

A. The original location of the library, including the building in which it was located;

B. The years during which the library was in operation;

C. The offices, plant facilities, departments or other organizational units serviced by the library;

D. Identify each custodian of the library or librarian as well as the years of his service as librarian

Answer:

Objection. Chrysler objects to this interrogatory on the ground that it is irrelevant, overbroad, unduly burdensome, not properly limited as to time and not reasonably calculated to lead to the discovery of admissible evidence. Notwithstanding and without waiving these objections, the Industrial Hygiene Department and Medical Department at Chrysler maintain reference libraries.

LSK&D #: 140-6031 / BDD0FB85.WPF
SUPREME COURT OF THE STATE OF NEW YORK
SEVENTH JUDICIAL DISTRICT

---X

In Re Seventh Judicial District
Asbestos Litigation

SEVENTH JUDICIAL DISTRICT
ASBESTOS LITIGATION

---X

This Document Applies to:

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF ONTARIO

RESPONSE TO PLAINTIFF'S REQUEST FOR INSPECTION AND PRODUCTION OF DOCUMENTS

---X

ANNE M. TINKER, Executrix of the Estate of TIMOTHY W. TINKER, Deceased, and Individually as the Surviving Spouse of TIMOTHY W. TINKER,

Index #: 83778

Plaintiff,

-against-

A.E. CLEVITE, INC., ALLIED SIGNAL, INC., individually and as successor in interest to ALLIED CORPORATION, as successor in interest to THE BENDIX CORPORATION, BEAVER DAM PRODUCTS CORPORATION, formerly known as CHRYSLER MARINE CORPORATION, BORG-WARNER CORPORATION, BRIGGS-STRATTON CORPORATION, BROCKWAY, INC., CARLISLE COMPANIES, INC., CATERPILLAR, INC., CHRYSLER CORP., CUMMINS ENGINE COMPANY, INC., DEERE & CO., INC., DETROIT DIESEL CORPORATION, DRESSER INDUSTRIES, INC. (WAUKESHA ENGINES DIVISION), FEL-PRO INCORPORATED, FORD MOTOR COMPANY, GARLOCK INC., GENERAL MOTORS CORPORATION, J.P. INDUSTRIES, INC., KENWORTH TRUCKS, KOHLER CO., LIPE-ROLLWAY CORPORATION, MACK TRUCKS, INC., individually and as successor in interest to BROCKWAY, INC., NAVISTAR INTERNATIONAL TRANSPORTATION CORP., f/k/a INTERNATIONAL HARVESTER, OSHKOSH TRUCK CORP., PACCAR, INC., individually and through its division, PETERBILT MOTORS CO., PERKINS ENGINES, INC., PNEUMO ABEX CORPORATION, individually and as successor in interest to ABEX CORPORATION, TELEDYNE, INC., W.R. GRACE & CO.-CONN., WAGNER ELECTRIC CORP., WIS-CON TOTAL POWER CORP.,

Defendants.

---X

ALLIED SIGNAL, INC.,

Third-Party Plaintiff,

-against-

FRED M. TINKER & SONS, INC.,

Third-Party Defendant.

---X

Defendant, BEAVER DAM PRODUCTS CORPORATION (hereinafter "Beaver Dam"), by their attorneys, LESTER SCHWAB KATZ & DWYER, hereby responds to plaintiffs' Request for Inspection and Production of Documents dated November 1, 1996 as follows:

1. During the relevant exposure period from 1976 to 1980, BEAVER DAM operated a machining plant that manufactured component marine parts for outboard boat motors. The parts were used solely by Chrysler Marine Corporation. BEAVER DAM has never manufactured or distributed automobile friction parts such as brakes products, clutch assemblies or gasket materials. BEAVER DAM did not manufacture or distribute asbestos-containing products. Consequently, BEAVER DAM cannot produce any documents responsive to plaintiff's Request for Inspection and Production of Documents since plaintiff's request seeks product information for defendant products containing asbestos.

2. Beaver Dam is not in possession of any such documents. See Response to Demand No. 1.

3. Beaver Dam is not in possession of any such documents. See Response to Demand No. 1.

4. Beaver Dam is not in possession of any such documents. See Response to Demand No. 1.

5. Beaver Dam is not in possession of any such documents. See Response to Demand No. 1.

6. Beaver Dam is not in possession of any such documents. See Response to Demand No. 1.

7. Beaver Dam is not in possession of any such documents. See Response to Demand No. 1.

8. Beaver Dam is not in possession of any such documents. See Response to Demand No. 1.

9. Beaver Dam is not in possession of any such documents. See Response to Demand No. 1.

10. Beaver Dam is not in possession of any such documents. See Response to Demand No. 1.

11. Beaver Dam is not in possession of any such documents. See Response to Demand No. 1.

12. Beaver Dam is not in possession of any such documents. See Response to Demand No. 1.

PLEASE TAKE NOTICE, that defendant, BEAVER DAM, reserves the right to amend, modify and/or supplement any of its responses to this demand at any time during the course of this litigation up to and including time of trial.

Dated: New York, New York
April 11, 1997

Yours, etc.

LESTER SCHWAB KATZ & DWYER
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LSK&D #: 140-6031 / BDD0FB85.WPF
SUPREME COURT OF THE STATE OF NEW YORK
SEVENTH JUDICIAL DISTRICT

In Re Seventh Judicial District
Asbestos Litigation

This Document Applies to:

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF ONTARIO

ANNE M. TINKER, Executrix of the
Estate of TIMOTHY W. TINKER, Deceased,
and Individually as the Surviving Spouse of
TIMOTHY W. TINKER,

Plaintiff,

-against-

A.E. CLEVITE, INC., ET AL.,

Defendants.

ALLIED SIGNAL, INC.,

Third-Party Plaintiff,

-against-

FRED M. TINKER & SONS, INC.,

Third-Party Defendant.

SEVENTH JUDICIAL DISTRICT
ASBESTOS LITIGATION

RESPONSE TO PLAINTIFF'S REQUEST FOR INSPECTION AND PRODUCTION OF DOCUMENTS

Index #: 83778

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LSK&D #: 140-6031 / BDD0F9AE.WPF
SUPREME COURT OF THE STATE OF NEW YORK
SEVENTH JUDICIAL DISTRICT

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COUNTY OF ONTARIO

ANNE M. TINKER, Executrix of the
Estate of TIMOTHY W. TINKER, Deceased,
and Individually as the Surviving Spouse of
TIMOTHY W. TINKER,

Plaintiff,

-against-

A.E. CLEVITE, INC., ALLIED SIGNAL, INC., individually and as successor in interest to ALLIED CORPORATION, as successor in interest to THE BENDIX CORPORATION, BEAVER DAM PRODUCTS CORPORATION, formerly known as CHRYSLER MARINE CORPORATION, BORG-WARNER CORPORATION, BRIGGS-STRATTON CORPORATION, BROCKWAY, INC., CARLISLE COMPANIES, INC., CATERPILLAR, INC., CHRYSLER CORP., CUMMINS ENGINE COMPANY, INC., DEERE & CO., INC., DETROIT DIESEL CORPORATION, DRESSER INDUSTRIES, INC. (WAUKESHA ENGINES DIVISION), FEL-PRO INCORPORATED, FORD MOTOR COMPANY, GARLOCK INC., GENERAL MOTORS CORPORATION, J.P. INDUSTRIES, INC., KENWORTH TRUCKS, KOHLER CO., LIPE-ROLLWAY CORPORATION, MACK TRUCKS, INC., individually and as successor in interest to BROCKWAY, INC., NAVISTAR INTERNATIONAL TRANSPORTATION CORP., f/k/a INTERNATIONAL HARVESTER, OSHKOSH TRUCK CORP., PACCAR, INC., individually and through its division, PETERBILT MOTORS CO., PERKINS ENGINES, INC., PNEUMO ABEX CORPORATION, individually and as successor in interest to ABEX CORPORATION, TELEDYNE, INC., W.R. GRACE & CO.-CONN., WAGNER ELECTRIC CORP., WIS-CON TOTAL POWER CORP.,

Defendants.

ALLIED SIGNAL, INC.,

Third-Party Plaintiff,

-against-

FRED M. TINKER & SONS, INC.,

Third-Party Defendant.

SEVENTH JUDICIAL DISTRICT
ASBESTOS LITIGATION

ANSWERS TO PLAINTIFF'S FIRST SET OF INTERROGATORIES ON BEHALF OF BEAVER DAM PRODUCTS, INC.

Index #: 83778

Defendant BEAVER DAM PRODUCTS CORPORATION, (hereinafter "Beaver Dam"), by its attorneys, LESTER SCHWAB KATZ & DWYER, hereby answer plaintiffs' First Set of Interrogatories dated November 1, 1996 as follows:

Defendant has made a good faith and reasonable effort to respond to plaintiffs' Interrogatories, and based upon that effort, defendant submits the following objects and responses. However, defendant has not completed its investigation relating to this incident, has not completed discovery in this action and has not completed preparation for trial. Accordingly, the following responses are based upon defendant's knowledge, information and belief at this time. Defendant specifically reserves the right to amend any responses to these interrogatories.

GENERAL OBJECTIONS

1. Defendant objects to the number of interrogatories.

2. Defendant objects to these interrogatories to the extent that terms or phrases contained therein are undefined, vague or ambiguous.

3. Defendant objects to the definitions contained in these interrogatories.

4. Defendant objects to these interrogatories to the extent that they seek information for an indefinite time period or for a time period beyond a reasonable scope of discovery appropriate to this action. Such requests are overly broad, unduly burdensome, immaterial, irrelevant, heresy, and not reasonably calculated to lead to the discovery of admissible evidence.

5. Defendant objects to these interrogatories to the extent that they seek confidential, proprietary, and/or sensitive business information, including confidential information pertaining to third-parties, disclosure of which would violate third-party

privacy rights. In the event the disclosure of such information is necessary, defendant objects to such disclosure without entry of an appropriate protective order to safeguard the confidentiality of all such information.

6. Defendant objects to these interrogatories in their entirety to the extent that they seek information protected from discovery by the attorney-client privilege and/or work product doctrine and/or any other privilege.

7. Defendant objects to these interrogatories to the extent that they exceed the scope of discovery permitted under New York CPLR.

8. The production of any document and response to plaintiff's interrogatories and requests to produce is made without waiving any objections defendant may have with respect to the admissibility of any information or a portion thereof. These general objections are continued and therefore applicable to each of the following interrogatories contained in plaintiff's interrogatories and requests to produce, subject to and without waiving the foregoing objections, and to the extent defendant understands each of the individual interrogatories, defendant, Beaver Dam, hereby submits its responses to plaintiff's First Set of Interrogatories as follows:

INTERROGATORIES

1. **DATA SOURCES**

A. Identify each person with whom you consulted or who provided information used in answering these Interrogatories and specify the Interrogatory for which information was given.

B. Identify each person's:

(1) Address'
(2) Position with the Defendant.

RESPONSE: I, Donald Berchem, answered these interrogatories with the assistance of Peter Askins, Julie Koslowski, and Thomas J. Force, Esq. Mr. Askins was Sales Manager for Beaver Dam/Acustar, Inc. from 1989-1994. I had worked at Beaver Dam as Vice President of Engineering from approximately 1983 to 1986, and Plant Manager from 1986 to 1994. From 1964 to 1980, I worked in the Engineering Department at Chrysler Marine Corporation and, in this capacity, have obtained knowledge of the business practices of Beaver Dam Products prior to 1983. From 1964 to 1980, I visited the Beaver Dam plant located in Beaver Dam, Wisconsin at least once per week and was in contact with the Plant on a daily basis by telephone. From 1976 to 1980, Beaver Dam operated a machining plant that manufactured component marine parts for outboard boat motors. The parts were used solely by Chrysler Marine Corporation.

Beaver Dam has never manufactured or distributed automobile friction parts such as brakes, clutch assemblies or gasket materials. Beaver Dam did not manufacture or distribute asbestos-containing products.

2. **CORPORATE INFORMATION**

State the following:

A. Defendant's correct corporate name;
B. State of your incorporation;
C. Address of your principal place of business;
D. Date and time period during which defendant held a certificate of authority to do business in the State of New York;
E. Dates and time period during which defendant regularly conducted business in New York.

RESPONSE: Beaver Dam Corporation was formed on January 7, 1965 in the State of Delaware, and was a wholly owned subsidiary of Chrysler Marine

Corporation. In or around May 1987, Beaver Dam's stock was purchased by Acustar, Inc., a wholly owned subsidiary of Chrysler Corporation. In or around December 31, 1994, Acustar, Inc. merged into the parent corporation resulting in Beaver Dam becoming a wholly owned subsidiary of Chrysler Corporation. In or around December 31, 1995, Beaver Dam merged into Chrysler Corporation, and is currently no longer in existence.

3. **CORPORATE HISTORY**

A. Describe in detail Defendant's complete corporate or business history for all business entities that were involved, in any manner, in the sale, manufacture, and/or distribution of asbestos and/or asbestos containing products.

B. State whether or not you have or have had subsidiary or predecessor corporation(s), and if so:

(1) The name of the subsidiary and/or predecessor;

(2) Its date(s) of incorporation, if a corporation;

(3) Its state(s) of incorporation;

(4) Its corporate purposes;

(5) Whether the subsidiary or predecessor was involved in any manner in the sale, manufacture, and/or distribution of asbestos containing products;

(a) The years that the subsidiary or predecessor was involved in the sale, manufacture, and/or distribution of asbestos-containing products.

(b) A description of the nature or type of asbestos that the subsidiary or predecessor sold, manufactured, or distributed.

RESPONSE: Beaver Dam objects to this Interrogatory on the grounds that it is overbroad and not reasonably calculated to lead to the discovery of admissible

evidence. Subject to and without waiving the foregoing objection, Beaver Dam refers plaintiff to its answers to Interrogatory Response No. "2".

4. **ASBESTOS/MANUFACTURE**

Has Defendant at any time, engaged in the manufacture of any asbestos containing product? If so, please state:

A. The years during which such activity took place;

B. If such activity was terminated, the reason why;

C. Identify the organizational unit of Defendant so engaged.

RESPONSE: No. See Interrogatory Response No. "2".

5. **ASBESTOS/SALES - DISTRIBUTOR**

Has Defendant at any time, engaged in the sale and/or distribution of any asbestos containing product? If so, please state:

A. The years during which such activity took place;

B. If such activity was terminated, the reason why;

C. Identify the organizational unit of Defendant so engaged.

RESPONSE: No. See Interrogatory Response No. "2".

6. **ASBESTOS/REBRANDING - RELABELING**

Has Defendant at any time, engaged in the rebranding or relabeling of asbestos containing products manufactured by other companies or entities? If so,

A. Identify such other companies or entities;

B. Indicate the specific asbestos products rebranded for each company;

C. Provide the dates of such rebranding.

RESPONSE: No. See Interrogatory Response No. "2".

7. **ASBESTOS PRODUCTS - MANUFACTURE**

A. Have you ever manufactured any of the following category of asbestos-containing products:

(1) Brakes and brake products including but not limited to brake shoes and brake linings, brake pads and brake assemblies;

(2) Clutches, clutch facings, and any other clutch products;

(3) Gaskets;

B. If so, as to each category of asbestos products state:

(1) The time period that product was manufactured;

(2) Product trade name;

(3) Percentage of asbestos in product;

(4) Type of asbestos in product (i.e., chrysotile, amosite, crocidolite);

(5) Product size;

(6) Product color;

(7) Describe packaging of asbestos product as to:

a. The type box/container used;

b. The date of each of box/container was used;

c. A physical description thereof, including the size and color of the box/container;

d. A description of size and color of any printed material that appeared on or in the box/container stating:

((1)) A verbatim statement of any warnings or cautions;

((2)) The date(s) each warning or caution was first used and last used;

((3)) Identify and produce a copy of the warning or caution.

RESPONSE: No. See Interrogatory Response No. "2".

8. **ASBESTOS PRODUCTS - SOLD**

A. Have you ever sold any of the following category of asbestos-containing products:

(1) Brakes and Brake products including but not limited to brake shoes and brake linings,k brake pads and brake assemblies;

(2) Clutches, clutch facings, and any other clutch products;

(3) Gaskets.

B. From what company or companies did you purchase the asbestos-containing product identified in Interrogatory No. 8A(1) - (3)? NOTE: If you purchased an asbestos product from more than one company, indicate in Interrogatory No. 8C(1) - (7) each company and each asbestos product.

C. If so, as to each category of asbestos products identified in Interrogatory No. 8A(1) - (3) state:

(1) The time period that product was sold;

(2) Product trade name;

(3) Percentage of asbestos in product;

(4) Type of asbestos in product (i.e., chrysotile, amosite, crocidolite);

(5) Product size;

(6) Product color;

(7) Describe packaging of asbestos product as to:

a. The type box/container used;

b. The date each type of box/container was used;

c. A physical description thereof, including the size and color of the box/container;

d. A description of size and color of any printed material that appeared on or in the box/container stating:

((1)) A verbatim statement of any warnings or cautions;

((2)) The date(s) each warning or caution was first used and last used;

((3)) Identify and produce a copy of the warning or caution.

RESPONSE: No. See Interrogatory Response No. "2".

9. **TESTING**

Were any tests conducted of the asbestos products listed in Interrogatory No. 7 or 8 to determine potential health hazards involved in the products' use or handling? If so, state as to each asbestos product:

A. The identity of each individual or firm who conducted such tests;

B. The date, purpose, and result of each such test;

C. Identify and produce all documents relating to such tests.

RESPONSE: No. See Interrogatory Response No. "2".

10. **ASBESTOS FREE PRODUCTS**

For each asbestos containing product identified in Interrogatory Answer No. 7 and 8, state:

A. Was the product, or a substitute for that product, ever manufactured and/or sold by you without asbestos; if so, when did the manufacture and/or sale of the product commence;

B. The brand name of the asbestos free product;

C. The reason product was manufactured without asbestos;

D. Was the asbestos-containing counterpart of the product manufactured and/or sold while the asbestos-free counterpart was being manufactured and/or sold, and., if so, provide the time periods.

RESPONSE: Not applicable.

11. **KNOWLEDGE/ASBESTOS - LUNG CANCER - MESOTHELIOMA**

A. State whether Defendant obtained, prior to 1980, any knowledge concerning the association, if any, between the inhalation of asbestos fibers and: (1) asbestosis; (2) lung cancer; (3) mesothelioma. If so, state as to (1) asbestos; (2) lung cancer; (3) mesothelioma:

(1) When this knowledge was first acquired;

(2) How it was acquired;

(3) Identify by whom it was acquired;

(4) State the substance of the knowledge acquired.

B. Identify all documents relevant to your acquisition of knowledge concerning the disease and the custodian thereof.

RESPONSE: Beaver Dam objects to this Interrogatory on the grounds that it is impermissibly broad and burdensome. Beaver Dam further objects on the grounds that the interrogatory is not relevant or reasonably calculated to lead to discoverable evidence. Without waiving this objection, Beaver Dam states that it did not manufacture or distribute asbestos-containing products.

12. **WARNING/INSERT**

Has Defendant ever placed any form of package insert or informative brochure, in a box/container of an asbestos-containing product, listed in response to Interrogatory 7 and 8, explaining the health hazards of asbestos? If so, state as to each such insert or brochure:

A. When it was first placed in containers and for what years thereafter;

B. What products had the insert or brochure included;

C. Provide a verbatim statement of the insert.

RESPONSE: No. Beaver Dam did not manufacture or distribute asbestos-containing products.

13. **WARNING/MASK**

Has Defendant ever placed any form of disposable face mask or respirator in a container of an asbestos-containing product? If so, please state:

A. The products covered by the practice;

B. The year this practice began and the years it was implemented;

C. Describe the type of face mask or respirator included in the container.

RESPONSE: Not applicable.

14. **TRADE ASSOCIATION**

A. State the names and addresses of all professional, industrial, health and safety organizations to which you have belonged which have anything to do with the health effects of asbestos, the proper methods of working with asbestos, methods of controlling asbestos dust, setting of standards or regulations, information, lobbying, research, engineering, or use of asbestos products, materials, or fibers.

B. As to each trade association state the date of membership.

RESPONSE: Beaver Dam did not belong to any such professional, industrial or health and safety organizations.

15. **WORKMEN COMPENSATION CLAIMS**

Have you had any claims of employees alleging injury due to asbestos exposure? If so, state:

A. The date the claim was filed;

B. The type and description of the injury claimed;

C. The name of the claimant;

D. The disposition of the claim;

E. Identify and produce all documents relating to each workmen compensation claim.

RESPONSE: No. See Interrogatory Response No. "2".

Dated: New York, New York
April 11, 1997

TO:

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SUPREME COURT OF THE STATE OF NEW YORK
SEVENTH JUDICIAL DISTRICT

---X

In Re Seventh Judicial District
Asbestos Litigation

SEVENTH JUDICIAL DISTRICT
ASBESTOS LITIGATION

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SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF ONTARIO

AFFIDAVIT

---X

ANNE M. TINKER, Executrix of the
Estate of TIMOTHY W. TINKER, Deceased,
and Individually as the Surviving Spouse of
TIMOTHY W. TINKER,

Index #: 83778

Plaintiff,

-against-

A.E. CLEVITE, INC., ALLIED SIGNAL, INC., individually and as successor in interest to ALLIED CORPORATION, as successor in interest to THE BENDIX CORPORATION, BEAVER DAM PRODUCTS CORPORATION, formerly known as CHRYSLER MARINE CORPORATION, BORG-WARNER CORPORATION, BRIGGS-STRATTON CORPORATION, BROCKWAY, INC., CARLISLE COMPANIES, INC., CATERPILLAR, INC., CHRYSLER CORP., CUMMINS ENGINE COMPANY, INC., DEERE & CO., INC., DETROIT DIESEL CORPORATION, DRESSER INDUSTRIES, INC. (WAUKESHA ENGINES DIVISION), FEL-PRO INCORPORATED, FORD MOTOR COMPANY, GARLOCK INC., GENERAL MOTORS CORPORATION, J.P. INDUSTRIES, INC., KENWORTH TRUCKS, KOHLER CO., LIPE-ROLLWAY CORPORATION, MACK TRUCKS, INC., individually and as successor in interest to BROCKWAY, INC., NAVISTAR INTERNATIONAL TRANSPORTATION CORP., f/k/a INTERNATIONAL HARVESTER, OSHKOSH TRUCK CORP., PACCAR, INC., individually and through its division, PETERBILT MOTORS CO., PERKINS ENGINES, INC., PNEUMO ABEX CORPORATION, individually and as successor in interest to ABEX CORPORATION, TELEDYNE, INC., W.R. GRACE & CO.-CONN., WAGNER ELECTRIC CORP., WIS-CON TOTAL POWER CORP.,

Defendants.

---X

ALLIED SIGNAL, INC.,

Third-Party Plaintiff,

-against-

FRED M. TINKER & SONS, INC.,

Third-Party Defendant.

---X

STATE OF WISCONSIN)
) ss:
COUNTY OF)

I, Donald Berchem, who being duly sworn according to the law, deposes and says that he was Sales Manager for Beaver Dam Corporation from 1989 - 1994 and, as such, is duly authorized to execute this Affidavit on behalf of Beaver Dam Corporation and that the facts set forth in the foregoing Responses to Plaintiffs' First Set of Interrogatories are true and correct to the best of his knowledge, information and belief.

Dated: _____, Wisconsin
_____, 1997

_____
DONALD BERCHEM

Sworn to and subscribed
before me this _____ day
of _____, 1997.

_____
NOTARY PUBLIC

LSK&D #: 140-6031 / BDD0F9AE.WPF
SUPREME COURT OF THE STATE OF NEW YORK
SEVENTH JUDICIAL DISTRICT

In Re Seventh Judicial District
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TIMOTHY W. TINKER,

Plaintiff,

-against-

A.E. CLEVITE, INC., ET AL.,

Defendants.

ALLIED SIGNAL, INC.,

Third-Party Plaintiff,

-against-

FRED M. TINKER & SONS, INC.,

Third-Party Defendant.

SEVENTH JUDICIAL DISTRICT
ASBESTOS LITIGATION

ANSWERS TO PLAINTIFF'S FIRST SET OF INTERROGATORIES ON BEHALF OF BEAVER DAM PRODUCTS, INC.

Index #: 83778

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LSK&D #: 140-6031 / BDD0FB68.WPF
SUPREME COURT OF THE STATE OF NEW YORK
SEVENTH JUDICIAL DISTRICT

---X

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Plaintiff,

-against-

A.E. CLEVITE, INC., ALLIED SIGNAL, INC., individually and as successor in interest to ALLIED CORPORATION, as successor in interest to THE BENDIX CORPORATION, BEAVER DAM PRODUCTS CORPORATION, formerly known as CHRYSLER MARINE CORPORATION, BORG-WARNER CORPORATION, BRIGGS-STRATTON CORPORATION, BROCKWAY, INC., CARLISLE COMPANIES, INC., CATERPILLAR, INC., CHRYSLER CORP., CUMMINS ENGINE COMPANY, INC., DEERE & CO., INC., DETROIT DIESEL CORPORATION, DRESSER INDUSTRIES, INC. (WAUKESHA ENGINES DIVISION), FEL-PRO INCORPORATED, FORD MOTOR COMPANY, GARLOCK INC., GENERAL MOTORS CORPORATION, J.P. INDUSTRIES, INC., KENWORTH TRUCKS, KOHLER CO., LIPE-ROLLWAY CORPORATION, MACK TRUCKS, INC., individually and as successor in interest to BROCKWAY, INC., NAVISTAR INTERNATIONAL TRANSPORTATION CORP., f/k/a INTERNATIONAL HARVESTER, OSHKOSH TRUCK CORP., PACCAR, INC., individually and through its division, PETERBILT MOTORS CO., PERKINS ENGINES, INC., PNEUMO ABEX CORPORATION, individually and as successor in interest to ABEX CORPORATION, TELEDYNE, INC., W.R. GRACE & CO.-CONN., WAGNER ELECTRIC CORP., WIS-CON TOTAL POWER CORP.,

Defendants.

---X

ALLIED SIGNAL, INC.,

Third-Party Plaintiff,

-against-

FRED M. TINKER & SONS, INC.,

Third-Party Defendant.

---X

SEVENTH JUDICIAL DISTRICT
ASBESTOS LITIGATION

ANSWERS TO PLAINTIFFS' SECOND SET OF INTERROGATORIES ON BEHALF OF BEAVER DAM PRODUCTS, INC.

Index #: 83778

Defendant, BEAVER DAM PRODUCTS CORPORATION (hereinafter "Beaver Dam"), by their attorneys, LESTER SCHWAB KATZ & DWYER, hereby answer plaintiffs' Second Set of Interrogatories dated November 1, 1996 as follows:

Defendant has made a good faith and reasonable effort to respond to plaintiffs' Interrogatories, and based upon that effort, defendant submits the following objects and responses. However, defendant has not completed its investigation relating to this incident, has not completed discovery in this action and has not completed preparation for trial. Accordingly, the following responses are based upon defendant's knowledge, information and belief at this time. Defendant specifically reserves the right to amend any responses to these interrogatories. The responses are limited to the alleged exposure period of 1976 to 1980.

GENERAL OBJECTIONS

1. Defendant objects to the number of interrogatories.

2. Defendant objects to these interrogatories to the extent that terms or phrases contained therein are undefined, vague or ambiguous.

3. Defendant objects to the definitions contained in these interrogatories.

4. Defendant objects to these interrogatories to the extent that they seek information for an indefinite time period or for a time period beyond a reasonable scope of discovery appropriate to this action. Such requests are overly broad, unduly burdensome, immaterial, irrelevant, heresy, and not reasonably calculated to lead to the discovery of admissible evidence.

5. Defendant objects to these interrogatories to the extent that they seek confidential, proprietary, and/or sensitive business information, including confidential information pertaining to third-parties, disclosure of which would violate third-party privacy rights. In the event the disclosure of such information is necessary, defendant objects to such disclosure without entry of an appropriate protective order to safeguard the confidentiality of all such information.

6. Defendant objects to these interrogatories in their entirety to the extent that they seek information protected from discovery by the attorney-client privilege and/or work product doctrine and/or any other privilege.

7. Defendant objects to these interrogatories to the extent that they exceed the scope of discovery permitted under New York CPLR.

8. The production of any document and response to plaintiff's interrogatories and requests to produce is made without waiving any objections defendant may have with respect to the admissibility of any information or a portion thereof. These general objections are continued and therefore applicable to each of the following interrogatories contained in plaintiff's interrogatories and requests to produce, subject to and without waiving the foregoing objections, and to the extent defendant understands each of the individual interrogatories, defendant, Beaver Dam, hereby submits its responses to plaintiff's Second Set of Interrogatories as follows:

INTERROGATORIES

1. **DATA SOURCES**

   A. Identify each person with whom you consulted or who provided information used in answering these Interrogatories and specify the Interrogatory for which information was given.

B. Identify each person's:

(1) Address;
(2) Position with the Defendant.

RESPONSE: I, Donald Berchem, answered these interrogatories with the assistance of Peter Askins, Julie Koslowski, and Thomas J. Force, Esq. Mr. Askins was Sales Manager for Beaver Dam/Acustar, Inc. from 1989-1994. I had worked at Beaver Dam as Vice President of Engineering from approximately 1983 to 1986, and Plant Manager from 1986 to 1994. From 1964 to 1980, I worked in the Engineering Department at Chrysler Marine Corporation and, in this capacity, have obtained knowledge of the business practices of Beaver Dam Products prior to 1983. From 1964 to 1980, I visited the Beaver Dam plant located in Beaver Dam, Wisconsin at least once per week and was in contact with the Plant on a daily basis by telephone. From 1976 to 1980, Beaver Dam operated a machining plant that manufactured component marine parts for outboard boat motors. The parts were used solely by Chrysler Marine Corporation.

Beaver Dam has never manufactured or distributed automobile friction parts such as brakes, clutch assemblies or gasket materials. Beaver Dam did not manufacture or distribute asbestos-containing products.

2. **PURCHASE OF ASBESTOS COMPONENT PARTS**

List the name, principal place of business of every manufacturer or remanufacturer, and years from whom you purchased the following asbestos-containing component parts for any of your vehicles (except automobiles) or engines during the years 1970-1980.

A. any clutch products, including, but not limited to, clutches, clutch assemblies and clutch facings;
B. any brake products, including, but not limited to, brake shoes and brake linings, brake assemblies, or brake pads; and

C. gaskets.

RESPONSE: Beaver Dam Corporation did not manufacturer or re-manufacture asbestos-containing products. From 1976 to 1980, Beaver Dam operated a machining plant that manufactured component marine parts for outboard boat motors. The parts were used solely by Chrsyler Marine Corporation. Beaver Dam has never manufactured or distributed automobile friction parts, such as brakes, clutch assemblies, or gasket materials. Beaver Dam did not manufacture or distribute asbestos-containing products.

3. MANUFACTURE OF ASBESTOS COMPONENT PARTS

State whether and what years defendant manufactured or remanufactured any of the following asbestos-containing parts for any of your vehicles (except automobiles) or engines during the years 1970 - 1980.

A. any clutch products, including, but not limited to, clutches, clutch assemblies and clutch facings;

B. any brake products, including, but not limited to, brake shoes and brake linings, brake assemblies, or brake pads; and

C. gaskets.

RESPONSE: Beaver Dam did not manufacture or re-manufacture clutch products or gaskets containing asbestos.

4. SALE OF ASBESTOS COMPONENT PARTS

State whether Defendant sold any of the asbestos-containing component parts during the years 1970 - 1980 listed in Interrogatory No. 2, either directly or through any of your agents or independent dealers.

If so, state: (1) which component parts you or your agents or independent dealers sold, (2) state the years these component parts were sold, and (3) the trade name(s) under which the component parts were sold.

RESPONSE: See Interrogatory Response No. "2".

5. **MANUFACTURE OF VEHICLES/ENGINES CONTAINING ASBESTOS COMPONENT PARTS**

Has Defendant engaged from 1970 through 1980 in the manufacture or remanufacture of any vehicle (except automobiles) or engine containing any of the asbestos component parts listed in Interrogatory No. 2? If so, state:

A. Which asbestos-containing part;
B. The amount of asbestos (%) and fiber type;
C. The years during which such activity took place; and
D. If such activity was terminated, the reason why.

RESPONSE: Beaver Dam has not engaged in the manufacture or re-manufacture of any vehicle or engine containing asbestos component parts from 1970 to 1980.

6. **SALE OF VEHICLES/ENGINES CONTAINING ASBESTOS COMPONENT PARTS**

Has Defendant engaged from 1970 through 1980 in the sale of any vehicles (except automobiles) or engines containing any of the asbestos component parts listed in Interrogatory No. 2? If so, state:

A. Which asbestos-containing part;
B. The amount of asbestos (%) and fiber type;
C. The date such activity began; and
D. The date when such activity waster terminated.

RESPONSE: Beaver Dam has not engaged in the sale of any vehicle or engine containing asbestos component parts for 1970 to 1980.

7. **RELABELLING OF ASBESTOS COMPONENT PARTS**

Has Defendant from 1970 through engaged in the relabelling or rebranding of any of the asbestos component parts listed in Interrogatory No. 2 manufactured in whole or in part by an unrelated business entity: If so, state:

A. Which asbestos-containing part;
B. The name of the unrelated business entity which manufactured the component part;
C. The component part's original trade and/or brand name;

D. Who performed the physical relabelling or rebranding and where it was accomplished;
E. The years during which such activity took place;
F. The brand name and/or trade name after the product was rebranded;
G. The amount of asbestos (%) and fiber type; and
H. Whether the rebranded or relabelled parts were ever placed in any of the Defendant's vehicles or engines.

RESPONSE: No. See Interrogatory Response No. "2".

8. **TESTING**

Were any tests conducted on any asbestos-containing component parts identified in Interrogatory Nos. 2, 3, 4, 5, 6 or 7 to determine:

A. Identify each individual or firm who conducted such tests;
B. The date, purpose, and result of each such test; and
C. Identify and produce all documents relating to such tests.

RESPONSE: No. See Interrogatory Response No. "2", "3", "4", "5", "6", and "7".

9. **WARNING/DESCRIPTION**

For each of the component parts listed in Interrogatory No. 2 which contained asbestos and which were placed in your vehicles (except automobiles) or engines during the period between 1970-80, state whether you placed any caution, warning or hazard statement or explanation involving asbestos on either the component part, the vehicle or engine in which the component part was placed.

If so, provide as to each component part the following information as to the caution, warning or hazard statement:

A. Its precise wording;
B. Where was it located on the product, packaging, and what was the size and color of the lettering.
C. Has the wording or its presentation ever been altered, and if so, how and when?
D. The years during which each version of a caution, warning or hazard statement appeared on each component part; and
E. Identify all documents relating to the warning.

RESPONSE: Not applicable. See Interrogatory Response No. "2".

10. **WARNING/INSERT**

If you sold or resold any of the component parts listed in Interrogatory No. 2 which contained asbestos, either directly or through any of your independent dealers, did you ever place any form of package insert or informative brochure in the container accompanying the component part explaining the hazards of asbestos?

A. When was it first placed in containers and for what years thereafter;
B. What products had the insert or brochure included;
C. Provide a verbatim statement of the insert; and
D. Identify all documents relating to the warning.

RESPONSE: Not applicable. See Interrogatory Response No. "2".

11. **WARNING/MASK**

If you sold or manufactured any asbestos containing component parts listed in Interrogatory No. 4 and/or 5, did you ever place any form of disposable face masks or respirator in a container for later use by persons who would handle and/or be exposed to such parts? If so, please state:

A. The parts covered by the practice;
B. The year this practice began and the years it was implemented; and
C. Describe the type of face masks or respirator included in the container.

RESPONSE: Not applicable. See Interrogatory Response No. "2".

Dated: New York, New York
April 11, 1997

TO:

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SUPREME COURT OF THE STATE OF NEW YORK
SEVENTH JUDICIAL DISTRICT

In Re Seventh Judicial District Asbestos Litigation

SEVENTH JUDICIAL DISTRICT
ASBESTOS LITIGATION

This Document Applies to:

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF ONTARIO

AFFIDAVIT

ANNE M. TINKER, Executrix of the Estate of TIMOTHY W. TINKER, Deceased, and Individually as the Surviving Spouse of TIMOTHY W. TINKER,

Index #: 83778

Plaintiff,

-against-

A.E. CLEVITE, INC., ALLIED SIGNAL, INC., individually and as successor in interest to ALLIED CORPORATION, as successor in interest to THE BENDIX CORPORATION, BEAVER DAM PRODUCTS CORPORATION, formerly known as CHRYSLER MARINE CORPORATION, BORG-WARNER CORPORATION, BRIGGS-STRATTON CORPORATION, BROCKWAY, INC., CARLISLE COMPANIES, INC., CATERPILLAR, INC., CHRYSLER CORP., CUMMINS ENGINE COMPANY, INC., DEERE & CO., INC., DETROIT DIESEL CORPORATION, DRESSER INDUSTRIES, INC. (WAUKESHA ENGINES DIVISION), FEL-PRO INCORPORATED, FORD MOTOR COMPANY, GARLOCK INC., GENERAL MOTORS CORPORATION, J.P. INDUSTRIES, INC., KENWORTH TRUCKS, KOHLER CO., LIPE-ROLLWAY CORPORATION, MACK TRUCKS, INC., individually and as successor in interest to BROCKWAY, INC., NAVISTAR INTERNATIONAL TRANSPORTATION CORP., f/k/a INTERNATIONAL HARVESTER, OSHKOSH TRUCK CORP., PACCAR, INC., individually and through its division, PETERBILT MOTORS CO., PERKINS ENGINES, INC., PNEUMO ABEX CORPORATION, individually and as successor in interest to ABEX CORPORATION, TELEDYNE, INC., W.R. GRACE & CO.-CONN., WAGNER ELECTRIC CORP., WIS-CON TOTAL POWER CORP.,

Defendants.

ALLIED SIGNAL, INC.,

Third-Party Plaintiff,

-against-

FRED M. TINKER & SONS, INC.,

Third-Party Defendant.

STATE OF)
) ss:
COUNTY OF)

I, Donald Berchem, who being duly sworn according to the law, deposes and says that he was Sales Manager for Beaver Dam Corporation from 1989 - 1994 and, as such, is duly authorized to execute this Affidavit on behalf of Beaver Dam Corporation and that the facts set forth in the foregoing Responses to Plaintiffs' Second Set of Interrogatories are true and correct to the best of his knowledge, information and belief.

Dated: _____, Wisconsin
_____, 1997

_____
DONALD BERCHEM

Sworn to and subscribed
before me this _____ day
of _____, 1997.

_____
NOTARY PUBLIC

LSK&D #: 140-6031 / BDD0FB68.WPF
SUPREME COURT OF THE STATE OF NEW YORK
SEVENTH JUDICIAL DISTRICT

In Re Seventh Judicial District
Asbestos Litigation

This Document Applies to:

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF ONTARIO

ANNE M. TINKER, Executrix of the
Estate of TIMOTHY W. TINKER, Deceased,
and Individually as the Surviving Spouse of
TIMOTHY W. TINKER,

Plaintiff,

-against-

A.E. CLEVITE, INC., ET AL.,

Defendants.

ALLIED SIGNAL, INC.,

Third-Party Plaintiff,

-against-

FRED M. TINKER & SONS, INC.,

Third-Party Defendant.

SEVENTH JUDICIAL DISTRICT
ASBESTOS LITIGATION

ANSWERS TO PLAINTIFFS' SECOND SET OF INTERROGATORIES ON BEHALF OF BEAVER DAM PRODUCTS, INC.

Index #: 83778

LESTER SCHWAB KATZ & DWYER
ATTORNEYS FOR Defendants CHRYSLER CORPORATION and BEAVER DAM PRODUCTS CORPORATION

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(212) 964-6611

SUPREME COURT OF THE STATE OF NEW YORK
SEVENTH JUDICIAL DISTRICT

In Re Seventh Judicial District Asbestos Litigation

SEVENTH JUDICIAL DISTRICT
ASBESTOS LITIGATION

This Document Applies to:

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF ONTARIO

ANNE M. TINKER, Executrix of the Estate of TIMOTHY W. TINKER, Deceased, and Individually as the Surviving Spouse of TIMOTHY W. TINKER,

Plaintiff, CASE NO. 83778

vs.

A.E. CLEVITE, INC.; et al.,

Defendants.

PLAINTIFFS' FIRST SET OF INTERROGATORIES
[PRODUCT DEFENDANTS]

TO: Cynthia Weiss Antonucci, Esq.
Lester, Schwab, Katz & Dwyer
Attorneys for Defendant BEAVER DAM PRODUCTS CORPORATION
120 Broadway
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Respectfully submitted,

MICHAEL A. PONTERIO, ESQ.
JOHN LIPSITZ, ESQ.
LIPSITZ & PONTERIO, L.L.C.
ATTORNEYS FOR PLAINTIFF
Office & Post Office Address
135 Delaware Avenue
Suite 506
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(716) 849-0701

DATED: July ___, 1996
Buffalo, New York

INSTRUCTIONS

INTERROGATORIES ARE CONTINUING IN NATURE

These Interrogatories shall be deemed continuing and supplemental responses shall be required promptly if the Defendant directly or indirectly obtains further information.

Pursuant to Civil Practice Law and Rules Section 3132, the Plaintiff demands that the Defendant hereby respond under oath to Plaintiff's First Set of Interrogatories [Product Defendants] within sixty (60) days of the service of these documents.

DEFINITIONS

As used in these interrogatories, the following words and terms shall mean and include the following:

1. "Plaintiff" means Timothy Tinker and Ann Tinker.

2. "Defendant" or any synonym thereof means the defendant corporation answering these interrogatories, as well as all, divisions, predecessors-in-interest, subsidiaries, agents, servants and employees, officers, executives, directors, private investigators, attorneys, representatives or others who are in possession of or who may have obtained information or knowledge for or on behalf of the defendant.

3. "You" or "Your" unless otherwise specified means the responding defendant. Present tense should be construed as also including past tense.

4. "Predecessor" means any corporation, entity, or assets at any time acquired or possessed by the defendant through any means including merger, consolidation, stock purchase, asset purchase, assumption, etc.

5. "Produce" means attach, make available or authorize the obtaining of any materials or documents requested to be produced for the purpose of inspection and/or copying.

PLAINTIFF'S FIRST SET OF INTERROGATORIES
[PRODUCT DEFENDANTS]

1. **DATA SOURCES**

A. Identify each person with whom you consulted or who provided information used in answering these Interrogatories and specify the Interrogatory for which information was given.

B. Identify each person's:

(1) Address;
(2) Position with the Defendant.

2. **CORPORATE INFORMATION**

State the following:

A. Defendant's correct corporate name;
B. State of your incorporation;
C. Address of your principal place of business;
D. Dates and time period during which defendant held a certificate of authority to do business in the state of New York;
E. Dates and time period during which defendant regularly conducted business in New York.

3. **CORPORATE HISTORY**

A. Describe in detail Defendant's complete corporate or business history for all business entities that were involved, in any manner, in the sale, manufacture, and/or distribution of asbestos and/or asbestos containing products.

B. State whether or not you have or have had subsidiary or predecessor corporation(s), and if so:

(1) The name of the subsidiary and/or predecessor;

(2) Its date(s) of incorporation, if a corporation;

(3) Its state(s) of incorporation;

(4) Its corporate purposes;

(5) Whether the subsidiary or predecessor was involved in any manner in the sale, manufacture, and/or distribution of asbestos-containing products

(a) The years that the subsidiary or predecessor was involved in the sale, manufacture, and/or distribution of asbestos-containing products.

(b) A description of the nature or type of asbestos that the subsidiary or predecessor sold, manufactured, or distributed.

4. **ASBESTOS/MANUFACTURE**

Has Defendant at any time, engaged in the manufacture of any asbestos containing product? If so, please state:

A. The years during which such activity took place;

B. If such activity was terminated, the reason why;

C. Identify the organizational unit of Defendant so engaged.

5. **ASBESTOS/SALES - DISTRIBUTOR**

Has Defendant at any time, engaged in the sale and/or distribution of any asbestos containing product? If so, please state:

A. The years during which such activity took place;

B. If such activity was terminated, the reason why;

C. Identify the organizational unit of Defendant so engaged.

6. **ASBESTOS/REBRANDING - RELABELING**

Has Defendant at any time, engaged in the rebranding or relabeling of asbestos containing products manufactured by other companies or entities? If so,

A. Identify such other companies or entities;

B. Indicate the specific asbestos products rebranded for each company;

C. Provide the dates of such rebranding.

7. **ASBESTOS PRODUCTS - MANUFACTURE**

A. Have you ever manufactured any of the following category of asbestos-containing products:

(1) Brakes and brake products including but not limited to brake shoes and brake linings, brake pads and brake assemblies;

(2) Clutches, clutch facings, and any other clutch products;

(3) Gaskets.

B. If so, as to each category of asbestos products state:

(1) The time period that product was manufactured;

(2) Product trade name;

(3) Percentage of asbestos in product;

(4) Type of asbestos in product (i.e., chrysotile, amosite, crocidolite);

(5) Product size;

(6) Product color;

(7) Describe packaging of asbestos product as to:

a. The type box/container used;

b. The date each type of box/container was used;

c. A physical description thereof, including the size and color of the box/container;

d. A description of size and color of any printed material that appeared on or in the box/container stating:

((1)) A verbatim statement of any warnings or cautions;

((2)) The date(s) each warning or caution was first used and last used;

((3)) Identify and produce a copy of the warning or caution.

8. **ASBESTOS PRODUCTS - SOLD**

A. Have you ever sold any of the following category of asbestos-containing products:

(1) Brakes and brake products including but not limited to brake shoes and brake linings, brake pads and brake assemblies;

(2) Clutches, clutch facings, and any other clutch products;

(3) Gaskets.

B. From what company or companies did you purchase the asbestos-containing product identified in Interrogatory No. 8A(1)-(3)? NOTE: If you purchased an asbestos product from more than one company, indicate in Interrogatory No. 8C(1)-(7) each company and each asbestos product.

C. If so, as to each category of asbestos products identified in Interrogatory No. 8A(1)-(3) state:

(1) The time period that product was sold;

(2) Product trade name;

(3) Percentage of asbestos in product;

(4) Type of asbestos in product (i.e., chrysotile, amosite, crocidolite);

(5) Product size;

(6) Product color;

(7) Describe packaging of asbestos product as to:

a. The type box/container used;

b. The date each type of box/container was used;

c. A physical description thereof, including the size and color of the box/container;

d. A description of size and color of any printed material that appeared on or in the box/container stating:

((1)) A verbatim statement of any warnings or cautions;

((2)) The date(s) each warning or caution was first used and last used;

((3)) Identify and produce a copy of the warning or caution.

9. **TESTING**

Were any tests conducted of the asbestos products listed in Interrogatory No. 7 or 8 to determine potential health hazards involved in the products' use or handling? If so, state as to each asbestos product:

A. The identify of each individual or firm who conducted such tests;

B. The date, purpose, and result of each such test;

C. Identify and produce all documents relating to such tests.

10. **ASBESTOS FREE PRODUCTS**

For each asbestos containing product identified in Interrogatory Answer No. 7 and 8, state:

A. Was the product, or a substitute for that product, ever manufactured and/or sold by you without asbestos; if so, when did the manufacture and/or sale of the product commence;

B. The brand name of the asbestos free product;

C. The reason product was manufactured without asbestos;

D. Was the asbestos-containing counterpart of the product manufactured and/or sold while the asbestos-free counterpart was being manufactured and/or sold, and, if so, provide the time periods.

11. KNOWLEDGE/ASBESTOSIS - LUNG CANCER - MESOTHELIOMA

A. State whether Defendant obtained, prior to 1980, any knowledge concerning the association, if any, between the inhalation of asbestos fibers and: (1) asbestosis; (2) lung cancer; (3) mesothelioma. If so, state as to (1) asbestosis; (2) lung cancer; (3) mesothelioma:

(1) When this knowledge was first acquired;

(2) How it was acquired;

(3) Identify by whom it was acquired;

(4) State the substance of the knowledge acquired.

B. Identify all documents relevant to your acquisition of knowledge concerning the disease and the custodian thereof.

12. WARNING/INSERT

Has Defendant ever placed any form of package insert or informative brochure in a box/container of an asbestos-containing product, listed in response to Interrogatory 7 and 8, explaining the health hazards of asbestos? If so, state as to each such insert or brochure:

A. When was it first placed in containers and for what years thereafter;

B. What products had the insert or brochure included;

C. Provide a verbatim statement of the insert.

13. **WARNING/MASK**

Has Defendant ever placed any form of disposable face mask or respirator in a container of an asbestos-containing product? If so, please state:

A. The products covered by the practice;

B. The year this practice began and the years it was implemented;

C. Describe the type of face mask or respirator included in the container.

14. **TRADE ASSOCIATION**

A. State the names and addresses of all professional, industrial, health and safety organizations to which you have belonged which have anything to do with the health effects of asbestos, the proper methods of working with asbestos, methods of controlling asbestos dust, setting of standards or regulations, information, lobbying, research, engineering, or use of asbestos products, materials, or fibers.

B. As to each trade association state the date of membership.

15. **WORKMEN COMPENSATION CLAIMS**

Have you had any claims of employees alleging injury due to asbestos exposure? If so, state:

A. The date the claim was filed;

B. The type and description of the injury claimed;

C. The name of the claimant;

D. The disposition of the claim;

E. Identify and produce all documents relating to each workmen compensation claim.

STATE OF _____:

COUNTY OF _____:

BEFORE ME, a Notary Public, personally appeared _____ _____, who being duly sworn according to law deposes and says that he/she is the _____, of _____ _____, and that he/she is authorized to make this affidavit on its behalf, and that the facts contained in the foregoing Answers to Plaintiff's First Set of Interrogatories are true and correct to the best of his/her knowledge and belief.

_____

SWORN TO AND SUBSCRIBED
before me this _____ day
of _____ , 1996.

_____
NOTARY PUBLIC

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing document, "Plaintiff's First Set of Interrogatories [Product Defendant]," was served on the counsel of record listed below by regular U.S. Mail on the ____ day of July, 1996.

TO: Cynthia Weiss Antonucci, Esq.
Lester, Schwab, Katz & Dwyer
Attorneys for Defendant BEAVER DAM PRODUCTS CORPORATION
120 Broadway
38th Floor
New York, NY 10271-0071

MICHAEL A. PONTERIO
ATTORNEY FOR PLAINTIFF

SUPREME COURT OF THE STATE OF NEW YORK
SEVENTH JUDICIAL DISTRICT

In Re Seventh Judicial District Asbestos Litigation

SEVENTH JUDICIAL DISTRICT
ASBESTOS LITIGATION

This Document Applies to:

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF ONTARIO

ANNE M. TINKER, Executrix of the Estate of TIMOTHY W. TINKER, Deceased, and Individually as the Surviving Spouse of TIMOTHY W. TINKER,

Plaintiff, CASE NO. 83778

vs.

A.E. CLEVITE, INC.; et al.,

Defendants.

PLAINTIFF'S SECOND SET OF INTERROGATORIES
[VEHICLE AND ENGINE INTERROGATORIES/PRODUCT DEFENDANTS]

TO: Cynthia Weiss Antonucci, Esq.
Lester, Schwab, Katz & Dwyer
Attorneys for Defendant BEAVER DAM PRODUCTS CORPORATION
120 Broadway
38th Floor
New York, NY 10271-0071

Respectfully submitted,

MICHAEL A. PONTERIO, ESQ.
JOHN LIPSITZ, ESQ.
LIPSITZ & PONTERIO, L.L.C.
ATTORNEYS FOR PLAINTIFF
Office & Post Office Address
135 Delaware Avenue
Suite 506
Buffalo, NY 14202-2410
(716) 849-0701

DATED: July ___, 1996
Buffalo, New York

INSTRUCTIONS

INTERROGATORIES ARE CONTINUING IN NATURE

These Interrogatories shall be deemed continuing and supplemental responses shall be required promptly if the Defendant directly or indirectly obtains further information.

Pursuant to Civil Practice Law and Rules Section 3132, the Plaintiff demands that the Defendant hereby respond under oath to Plaintiff's Second Set of Interrogatories [Vehicle & Engine Interrogatories/Product Defendants] within sixty (60) days of the service of these documents.

DEFINITIONS

As used in these interrogatories, the following words and terms shall mean and include the following:

1. "Plaintiff" means TIM and ANN TINKER.

2. "Defendant" or any synonym thereof means the defendant corporation answering these interrogatories, as well as all, divisions, predecessors-in-interest, subsidiaries, agents, servants and employees, officers, executives, directors, private investigators, attorneys, representatives or others who are in possession of or who may have obtained information or knowledge for or on behalf of the defendant.

3. "You" or "Your" unless otherwise specified means the responding defendant. Present tense should be construed as also including past tense.

4. "Predecessor" means any corporation, entity, or assets at any time acquired or possessed by the defendant through any means including merger, consolidation, stock purchase, asset purchase, assumption, etc.

5. "Produce" means attach, make available or authorize the obtaining of any materials or documents requested to be produced for the purpose of inspection and/or copying.

6. "Associated Business Entity" or "Business entity associated with you" means any business entity that is and/or was a predecessor in interest, a division and/or a subsidiary of the answering Defendant.

7. "Vehicle" means all vehicles except automobiles.

8. "Component part," as used in these Interrogatories, means: (a) any brake products, including but not limited to brake shoes and brake linings, brake pads and brake assemblies;

(b) clutch products including but not limited to clutches or clutch facings; and (c) gaskets.

9. "Remanufacturer" means any entity which reassembles, rebuilds, or reconstructs any vehicle or engine manufactured by another entity.

10. "Manufacturer of vehicles containing asbestos" means any entity that assembles, puts together, or manufactures any vehicle which contains asbestos or which contains component parts which contain asbestos, regardless of whether that entity actually designs, assembles, or puts together the component part itself, or which in any way processes or packages vehicles containing component parts containing asbestos.

11. "Manufacturer of engines containing asbestos" means any entity that assembles, puts together, or manufactures any engine which contains asbestos or which contains component parts which contain asbestos, regardless of whether that entity actually designs, assembles, or puts together the component part itself, or which in any way processes or packages engines containing component parts containing asbestos.

12. "Distributor of vehicles containing asbestos" means any entity which ships or in any way directs shipments of vehicles containing component parts containing asbestos.

13. "Distributor of engines containing asbestos" means any entity which ships or in any way directs shipments of engines containing component parts containing asbestos.

PLAINTIFF'S SECOND SET OF INTERROGATORIES
[VEHICLE & ENGINE INTERROGATORIES/PRODUCT DEFENDANTS]

1. **DATA SOURCES**

A. Identify each person with whom you consulted or who provided information used in answering these Interrogatories and specify the Interrogatory for which information was given.

B. Identify each person's:

(1) Address;
(2) Position with the Defendant.

2. **PURCHASE OF ASBESTOS COMPONENT PARTS**

List the name, principal place of business of every manufacturer or remanufacturer, and years from whom you purchased the following asbestos-containing component parts for any of your vehicles (except automobiles) or engines during the years 1970-1980.

A. any clutch products, including but not limited to clutches, clutch assemblies and clutch facings

B. any brake products, including, but not limited to brake shoes and brake linings, brake assemblies, or brake pads

C. gaskets

3. **MANUFACTURE OF ASBESTOS COMPONENT PARTS**

State whether and what years Defendant manufactured or remanufactured any of the following asbestos-containing parts for any of your vehicles (except automobiles) or engines during the years 1970-1980.

A. any clutch products, including but not limited to clutches, clutch assemblies and clutch facings

B. any brake products, including, but not limited to brake shoes and brake linings, brake assemblies, or brake pads

C. gaskets

4. **SALE OF ASBESTOS COMPONENT PARTS**

State whether Defendant sold any of the asbestos-containing component parts during the years 1970-1980 listed in Interrogatory No. 2, either directly or through any of your agents or independent dealers.

If so, state: (1) which component parts you or your agents or independent dealers sold, (2) state the years these component parts were sold, and (3) the trade name(s) under which the component parts were sold.

5. **MANUFACTURE OF VEHICLES/ENGINES CONTAINING ASBESTOS COMPONENT PARTS**

Has Defendant engaged from 1970 through 1980 in the manufacture or remanufacture of any vehicle (except automobiles) or engine containing any of the asbestos component parts listed in Interrogatory No. 2? If so, state:

A. Which asbestos-containing part;

B. The amount of asbestos (%) and fiber type.

C. The years during which such activity took place;

D. If such activity was terminated, the reason why.

6. **SALE OF VEHICLES/ENGINES CONTAINING ASBESTOS COMPONENT PARTS**

Has Defendant engaged from 1970 through 1980 in the sale of any vehicles (except automobiles) or engines containing any of the asbestos component parts listed in Interrogatory No. 2? If so, state:

A. Which asbestos-containing part;

B. The amount of asbestos (%) and fiber type.

C. The date such activity began;

D. The date when such activity was terminated.

7. **RELABELLING OF ASBESTOS COMPONENT PARTS**

Has Defendant from 1970 through 1980 engaged in the relabelling or rebranding of any of the asbestos component parts listed in Interrogatory No. 2 manufactured in whole or in part by an unrelated business entity? If so, state:

A. Which asbestos-containing part;

B. The name of the unrelated business entity which manufactured the component part;

C. The component part's original trade and/or brand name;

D. Who performed the physical relabelling or rebranding and where it was accomplished;

E. The years during which such activity took place;

F. The brand name and/or trade name after the product was rebranded;

G. The amount of asbestos (%) and fiber type;

H. Whether the rebranded or relabelled parts were ever placed in any of the Defendant's vehicles or engines.

8. **TESTING**

Were any tests conducted on any asbestos-containing component parts identified in Interrogatory No. 2, 3, 4, 5, 6, or 7 to determine:

A. The identify of each individual or firm who conducted such tests;

B. The date, purpose, and result of each such test;

C. Identify and produce all documents relating to such tests.

9. **WARNING/DESCRIPTION**

For each of the component parts listed in Interrogatory No. 2 which contained asbestos and which were placed in your vehicles (except automobiles) or engines during the period between 1970-80, state whether you placed any caution, warning or hazard statement or explanation involving asbestos on either the component part, the vehicle or engine in which the component part was placed.

If so, provide as to each component part the following information as to the caution, warning or hazard statement:

A. Its precise wording;

B. Where was it located on the product, packaging, and what was the size and color of the lettering.

C. Has the wording or its presentation ever been altered, and if so, how and when;

D. The years during which each version of a caution, warning or hazard statement appeared on each component part;

E. Identify all documents relating to the warning.

10. **WARNING/INSERT**

If you sold or resold any of the component parts listed in Interrogatory No. 2 which contained asbestos, either directly or through any of your independent dealers, did you ever place any form of package insert or informative brochure in the container accompanying the component part explaining the hazards of asbestos?

If so, state as to each such insert or brochure:

A. When was it first placed in containers and for what years thereafter;

B. What products had the insert or brochure included;

C. Provide a verbatim statement of the insert;

D. Identify all documents relating to the warning.

11. **WARNING/MASK**

If you sold or manufactured any asbestos containing component parts listed in Interrogatory No. 4 and/or 5, did you ever place any form of disposable face mask or respirator in a container for later use by persons who would handle and/or be exposed to such parts? If so, please state:

A. The parts covered by the practice;

B. The year this practice began and the years it was implemented;

C. Describe the type of face mask or respirator included in the container.

STATE OF _____:

COUNTY OF _____:

BEFORE ME, a Notary Public, personally appeared _____ _____, who being duly sworn according to law deposes and says that he/she is the _____, of _____ _____, and that he/she is authorized to make this affidavit on its behalf, and that the facts contained in the foregoing Answers to Plaintiff's Second Set of Interrogatories are true and correct to the best of his/her knowledge and belief.

_____

SWORN TO AND SUBSCRIBED
before me this _____ day
of _____ , 1996.

_____
NOTARY PUBLIC

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing document, "Plaintiff's Second Set of Interrogatories [Vehicle & Engine Interrogatories/Product Defendants]," was served on the counsel of record listed below by regular U.S. Mail on the ____ day of July, 1996.

TO: Cynthia Weiss Antonucci, Esq.
Lester, Schwab, Katz & Dwyer
Attorneys for Defendant BEAVER DAM PRODUCTS CORPORATION
120 Broadway
38th Floor
New York, NY 10271-0071

MICHAEL A. PONTERIO
ATTORNEY FOR PLAINTIFF

SUPREME COURT OF THE STATE OF NEW YORK
SEVENTH JUDICIAL DISTRICT

In Re Seventh Judicial District Asbestos Litigation

SEVENTH JUDICIAL DISTRICT
ASBESTOS LITIGATION

This Document Applies to:

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF ONTARIO

ANNE M. TINKER, Executrix of the Estate of TIMOTHY W. TINKER, Deceased, and Individually as the Surviving Spouse of TIMOTHY W. TINKER,

Plaintiff, CASE NO. 83778

vs.

A.E. CLEVITE, INC.; et al.,

Defendants.

PLAINTIFF'S REQUESTS FOR INSPECTION AND PRODUCTION OF DOCUMENTS [PRODUCT DEFENDANT SET] [PRODUCT AND VEHICLE/ENGINE DOCUMENTS]

TO: Cynthia Weiss Antonucci, Esq.
Lester, Schwab, Katz & Dwyer
Attorneys for Defendant BEAVER DAM PRODUCTS CORPORATION
120 Broadway
38th Floor
New York, NY 10271-0071

Pursuant to Civil Practice Law and Rules Section 3120, demand is made upon the Defendant to produce the items described at the law offices of Lipsitz and Ponterio, LLC, 135 Delaware Avenue, Suite 506, Buffalo, New York 14202-2410, within sixty (60) days of the service of this Notice.

1. All documents identified in response to Interrogatory No. 7B(7)d((3)) (Plaintiff's First Set of Interrogatories [Product Defendants]).

2. All documents identified in response to Interrogatory No. 8C(7)d((3)) (Plaintiff's First Set of Interrogatories [Product Defendants]).

3. All documents identified in response to Interrogatory No. 9C (Plaintiff's First Set of Interrogatories [Product Defendants]).

4. All documents identified in response to Interrogatory No. 11B (Plaintiff's First Set of Interrogatories [Product Defendants]).

5. All documents identified in response to Interrogatory No. 12C (Plaintiff's First Set of Interrogatories [Product Defendants]).

6. All documents identified in response to Interrogatory No. 15E (Plaintiff's First Set of Interrogatories [Product Defendants]).

7. All sales brochures; promotional pamphlets; product manuals; specification sheets; instructional materials; safety sheets; assembly maintenance, handling, and replacement instructions; circulated or utilized by the Defendant between 1970 through 1980 pertaining to asbestos containing: (1) brake products, including but not limited to brake shoes and brake linings, brake pads, and brake assemblies, (2) clutch products including but not limited to clutch or clutch facings, and (3) gaskets.

8. All documents identified in response to Interrogatory No. 8C (Plaintiff's Second Set of Interrogatories [Vehicle & Engine Interrogatories/Product Defendants]).

9. All documents identified in response to Interrogatory No. 9E (Plaintiff's Second Set of Interrogatories [Vehicle & Engine Interrogatories/Product Defendants]).

10. All documents identified in response to Interrogatory No. 10D (Plaintiff's Second Set of Interrogatories [Vehicle & Engine Interrogatories/Product Defendants]).

11. All sales brochures; promotional pamphlets; product manuals; specification sheets; instructional materials; safety sheets; assembly maintenance, handling, and replacement instructions; circulated or utilized by the Defendant between 1970 through 1980 pertaining to asbestos containing: (1) brake products, including but not limited to brake shoes and brake linings, brake pads, and brake assemblies, (2) clutch products including but not limited to clutch or clutch facings, and (3) gaskets, utilized in all engines and vehicles other than automobiles.

12. All documents related to any training or workshops conducted by the Defendants for any of their employees regarding the use, handling, or assembly of any asbestos containing component parts contained in or attached to its vehicles or

engines component parts including asbestos-containing: (1) brake products, including but not limited to brake shoes and brake linings, brake pads, and brake assemblies, (2) clutch products including but not limited to clutch or clutch facings, and (3) gaskets, utilized in all engines and vehicles other than automobiles.

Respectfully submitted,

MICHAEL A. PONTERIO, ESQ.
JOHN LIPSITZ, ESQ.

LIPSITZ & PONTERIO, L.L.C.
ATTORNEYS FOR PLAINTIFF

Office & Post Office Address
135 Delaware Avenue
Suite 506
Buffalo, NY 14202-2410
(716) 849-0701

DATED: July ___, 1996
Buffalo, New York

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing document, "Plaintiff's Requests for Inspection and Production of Documents [Product Defendant Set] [Product and Vehicle/Engine Documents]," was served on the counsel of record listed below by regular U.S. Mail on the ____ day of July, 1996.

TO: Cynthia Weiss Antonucci, Esq.
Lester, Schwab, Katz & Dwyer
Attorneys for Defendant BEAVER DAM PRODUCTS CORPORATION
120 Broadway
38th Floor
New York, NY 10271-0071

MICHAEL A. PONTERIO
ATTORNEY FOR PLAINTIFF

IN THE CIRCUIT COURT OF THE
11TH JUDICIAL CIRCUIT IN AND
FOR DADE COUNTY, FLORIDA

GENERAL JURISDICTION DIVISION

CASE NO.: 95-10261 CA 42

TIMOTHY TINKER and ANN TINKER,
his wife,

Plaintiffs,

-vs-

CHRYSLER CORPORATION, BEAVER
DAM PRODUCTS CORPORATION formerly
known as Chrysler Marine
Corporation, et. al.

Defendants .
_____/

CHRYSLER CORPORATION'S RESPONSES TO PLAINTIFF'S FIRST REQUEST TO PRODUCE

Defendant, **CHRYSLER CORPORATION**, through undersigned counsel hereby files its responses to Plaintiffs' Request for Production as follows:

1. To the extent this request calls for the production of all documents related to the subject matter of this lawsuit, Chrysler Corporation objects on the grounds that this request is unduly burdensome, overly broad and lacks particularity.

2. Chrysler Corporation objects to this request on the grounds of lack of relevance, and because it is unduly burdensome, overly broad, lacks particularity and is premature.

3. Chrysler Corporation objects to this request on the grounds of lack of relevance, and because it is unduly burdensome, overly broad, and is premature.

4. Chrysler Corporation objects to this request on the grounds that it is unduly burdensome, overly broad and makes improper assumptions.

5. Chrysler Corporation objects to this request on grounds of lack of relevance, and because it is unduly burdensome, overly broad, makes improper assumptions, and is premature.

6. Chrysler Corporation objects to this request on grounds of lack of relevance, and because it is unduly burdensome, overly broad, lacks particularity and is premature.

7. Chrysler Corporation objects to this request on grounds of lack of relevance, and because it is unduly burdensome, overly broad, lacks particularity and is premature.

8. Chrysler Corporation objects to this request because of lack of relevance and because it is unduly burdensome, overly broad, lacks particularity, contains improper assumptions and is premature.

9. Chrysler Corporation objects to this request on the grounds of lack of relevance, and because it is unduly burdensome, overly broad, lacks particularity and is premature.

10. Chrysler Corporation objects to this request on the grounds that it is unduly burdensome, overly broad, contains improper assumptions and lacks particularity.

11. Chrysler Corporation objects to this request on the grounds that it is unduly burdensome, overly broad, lacks particularity and may call for the production of the privileged information.

12. Chrysler Corporation objects to this request because of lack of relevance and because it is unduly burdensome, overly broad, lacks particularity, contains improper assumptions and is premature.

13. Chrysler Corporation objects to this request on grounds of lack of relevance, and because the request is unduly burdensome, overly broad, lacks particularity and may call for the production of privileged information.

14. Chrysler Corporation objects to this request on grounds that it is unduly burdensome, overly broad, lacks particularity and makes improper assumptions.

15. Chrysler Corporation objects to this request on the grounds that it is unduly burdensome, overly broad, lacks particularity and makes improper assumption.

16. Chrysler Corporation objects to this request on grounds of lack of relevance and because the request is unduly burdensome, overly broad, lacks particularity and makes improper assumptions.

17. Chrysler Corporation objects to this request on grounds of lack of relevance and because the request is unduly burdensome, overly broad, lacks particularity and is premature.

18. Chrysler Corporation objects to this request on grounds of lack of relevance and because the request is unduly burdensome, overly broad, lacks particularity and is premature.

19. Chrysler Corporation objects to this request on grounds of lack of relevance and because it is unduly burdensome, overly broad, lacks particularity and is premature.

20. Chrysler Corporations to this request on grounds of lack of relevance and because it is unduly burdensome, overly broad, lacks particularity and is premature.

21. Chrysler Corporation objects to this request on grounds of lack of relevance and because it is unduly burdensome, overly broad, lacks particularity and is premature.

22. Chrysler Corporation objects to this request on grounds of lack of relevance, and because it is unduly burdensome, overly broad, lacks particularity, makes improper assumptions, may call for the production of privileged information and is premature.

23. Chrysler Corporation objects to this request on grounds that it is unintelligible. To the extent request number 23 requests the creation of a document, such request is beyond the parameters of Florida Rule of Civil Procedure 1.350. Chrysler Corporation also objects to this request to the extent it calls for the creation of a privileged log on grounds that it is unduly burdensome, overly broad and premature at this stage of the discovery process.

24. Chrysler Corporation objects to this request on the grounds that it is unduly burdensome, overly broad, lacks particularity and may call for the production of privileged information.

HERZFELD & RUBIN
Suite 400
1901 W. Cypress Creek Road
Fort Lauderdale, Florida 33309
(305) 772-3599
Attorneys for Chrysler Corporation
and Beaver Dam Products Corporation

BY: _____
DAVID I. WEISS
Fla. Bar No. 656976

CERTIFICATE OF SERVICE

WE HEREBY CERTIFY that a true and correct copy of the foregoing was this 2nd day of October, 1995, delivered to **DAVID LIPMAN, ESQUIRE, Counsel for Plaintiffs,** 5901 S.W. 74th Street, Suite 304, Miami, Florida.

HERZFELD & RUBIN
Suite 400
1901 W. Cypress Creek Road
Fort Lauderdale, Florida 33309
(305) 772-3599
Attorneys for Chrysler Corp.
and Beaver Dam Products Corp.

BY: _____
DAVID I. WEISS
Fla. Bar No. 656976