(i) was any air sampling or measurement of the airborne asbestos at the facilities where the brake linings were made. If so provide copies of all records, reports and memorandum pertaining to such studies.

ANSWER:

No.

Interrogatory No. 19

Did the answering defendant ever purchase asbestos brake linings and secure them to a metal shoe at the defendant's manufacturing facilities (as opposed to purchasing a fully assembled brake shoe with the lining already attached)? If the answer is in the affirmative indicate:

(a) whether the answering defendant ever purchased asbestos containing brake linings from Johns Manville. If so indicate:

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

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

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

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

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

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

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

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