

products listed in response to Interrogatory Nos. 19 and 42 by, for, to or at said site; and, (ii) identify any and all persons known by Defendant to have knowledge concerning the same.

ANSWER:

Defendant objects to providing job site information identified by any Plaintiff because Defendant does not know the identity of future Plaintiffs' claimed work history. Buyer maintains computerized sales records. Those records are retrievable back to the 1990's and are retained by Buyer, not Defendant. Before that time, records may not be available on computer. Before use of computers, paper sales-related documents were kept and such records, in whole or in part, are available back to 1988 and are retained in boxes at Buyer's S. Beloit facility.

Two people employed by Buyer with information about sales are Mary Lawrer and Gloria Ward.

Warner Electric Brake & Clutch Company had both an independent network of distributors (and sales representatives) that sold its products and direct (OEM) customers. Defendant is reviewing documents but the following U.S. distributors and sales representatives are identified for some of the time period when Warner Electric Brake & Clutch Company manufactured products with asbestos-containing friction material. The information is limited to distributors in states within 200 miles of Madison County. Defendant does not know whether the products distributed contained friction material that contained asbestos.

Distributors

Alabama

Bearings & Transmissions Supply Co.
901 Congress Street

Indiana

Power Transmission Company
802 South Main Street