

OBJECTION. Overbroad, vague. Without waiving this objection, Eaton states that all documents in its possession which may contain information responsive to this Interrogatory have been previously provided to Plaintiff's counsel.

INTERROGATORY NO. 51

State whether Defendant or any of its subsidiary or predecessor companies at any time been a member of, belonged to, or participated in any trade organization or association, including but not limited to:

- (a) Society of Automotive Engineers;
- (b) The Asbestos Brake Lining Association;
- (c) The Heavy-Duty Manufacturers Council
- (d) The National Safety Council;
- (e) National Insulation Manufacturers Association;
- (f) The Asbestos Textile Institute;
- (g) Industrial Hygiene Foundation;
- (h) Defense Research Institute;
- (i) any other associations or organizations comprised of the manufactures or sellers of brake shoes, brake linings, clutch facings or any other friction products;

If the answer to any subpart above is in the affirmative state:

- (i) name and address of each such association or organization.
- (ii) the dates during which defendant or any of its subsidiaries or predecessors were members.
- (iii) the names and dates of any publications, minutes, or reports published, written, or disseminated by any of the named associations or organizations.
- (iv) whether any of those publications are still in your possession, and if so provide: