e. A detailed description of the product or part, setting forth the colors, dimensions, and material and/or chemical composition, (including weight, porcentile, location and the use of each chemical and/or material);

ANSWER(e through g): Please see answer to interrogatory 4(a)-(c). Notwithstanding these objections, R-M has used chrysotile, anthophyllite and, on occasion, a combination of chrysotile and anthophyllite in the various asbestos containing friction materials which it has manufactured. It has never used crocidolite or amosite in these products. R-M objects to the remainder of 4(e) - (g) because they are oppressive and burdensome due to the number of products involved and the extended time period for which the information is sought.

f. The type, grade and purity of each type of asbestos utilized in the product or part;

g. The percentile, chemical composition, location and use of each type and grade of asbestos utilized in the product or part.

5. Has defendant at any time since 1940 sold, distributed, or supplied any asbestos product or part containing asbestos to any manufacturer of motor vehicles or to any wholesaler or distributor of motor vehicles and/or automobile parts? If so, state:

ANSWER: Please see answer to interrogatory 4.

a. The kind and type of product or part, identifying by generic name, manufacturing name, tradename or brand name, make or model;

b. The motor vehicle said part or product was to be part of or within, identifying each said motor vehicle by manufacturer, make, model and year;

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