

1 REQUEST FOR PRODUCTION N: Pursuant to CR 34, you are
2 hereby requested to produce according to the above instructions a
3 copy of all documents pertaining to design changes as identified in
4 your response to the preceding interrogatory.
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6 RESPONSE: N/A
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10 SECTION 3.0
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12 3.01 Did you provide instructions and/or warnings
13 concerning the potential health hazards of asbestos exposure to
14 plaintiff's employer Stewart-Western, Inc. or Western Brake Ind.
15 Company at any time?

16 ANSWER: No. S. K. Wellman has no record of any sale of products to
17 the listed companies.
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20 3.02 If the answer to the preceding interrogatory is in
21 the affirmative, state the following:

22 (a) Whether the employer was expected or requested
23 to transfer the instructions and/or warnings to
 its employees such as plaintiff;

24 (b) The date(s) you provided instructions and/or
25 warnings to plaintiff's employer;
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