

1 RESPONSE TO INTERROGATORY NO. 44:

2 Wagner objects to this Interrogatory to the extent it
3 seeks information outside the plaintiff's alleged exposure peri-
4 ods. Subject to that objection, Wagner states that it has per-
5 formed scientific research and testing of its brake products
6 specifically directed to improving those products' performance,
7 safety and compliance with performance-related safety regula-
8 tions. Wagner has had no department, division or section devoted
9 to medical research during the period stated.

10 INTERROGATORY NO. 45:

11 Please state the scientific or medical periodicals to
12 which the defendant, its medical department or industrial hy-
13 giene division subscribed during the period between 1930 and
14 1972 specifying the date said subscriptions were begun.

15 RESPONSE TO INTERROGATORY NO. 45:

16 Wagner objects to this Interrogatory to the extent it
17 seeks information outside the Plaintiff's alleged exposure peri-
18 od. Subject to that objection, Wagner states that it knows of
19 no such periodicals to which it may have subscribed. Wagner's
20 investigation continues.

21 INTERROGATORY NO. 46:

22 Please state whether any of the distributors of defen-
23 dant's asbestos-containing products were provided with any spe-
24 cial instructions, oral or written, in regard to utilizing said
25 products in a manner so as to avoid exposing workers to dust.
26 If so, please state:

- 27 (a) When these instructions were given;
28 (b) By whom these instructions were given;
 (c) Whether the instructions oral or written;
 (d) The precise content of the instructions;
 (e) If the instructions were written, please attach a
copy of the instructions.