

customers may have been told by Warner Electric Brake & Clutch Company that asbestos was encapsulated or bonded into the friction material and that although there might be milling or drilling or similar functions performed in manufacturing the product, those functions are not part of the normal operation of clutch/brake products. Customers at that time were nonetheless advised to use MSDS precautions. MSDS's provided by suppliers would list, at least in some cases, the percentage of asbestos in the friction material.

INTERROGATORY NO. 94:

Identify any and all trade organizations, associations, or other entities, including but not limited to American Textile Institute (ATI), Asbestos Information Association (AIA), Industrial Health Foundation or Industrial Hygiene Foundation (IHF), National Insulation Manufacturers Assn. (NIMA), National Insulation Contractors Assn. (NICA), National Safety Council (NSC), American Ceramics Society (ACS), National Building Materials Distributors Assn. (NIA), Sprayed Mineral Fiber Manufacturers Assn. (SMFMA), Thermal Insulation Manufacturers Assn. (TIMA), Quebec Asbestos Mining Assn. (QAMA), to which Defendant, any predecessor or any related company has belonged or in which any or all of the same have participated since 1925, and state the applicable dates of such membership or participation.

ANSWER:

Defendant currently is aware of one trade organization, association or other entity to which Warner Electric Brake & Clutch Company may have belonged: Power Transmission Distributor Association. Defendant is aware that certain employees of Warner Electric Brake & Clutch