Please state whether defendant ever subscribed to the Asbestos magazine and list the dates of subscription.

RESPONSE TO INTERROGATORY NO. 62:

No.

INTERROGATORY NO. 63.

Please identify all booklets, manuals, journals and publications provided to the recipients of any asbestos-containing products manufactured, sold or distributed by defendant regarding the proper use and application of products. Include in your answer the dates said information was provided.

RESPONSE TO INTERROGATORY NO. 63:

See Wagner's response to Interrogatory No. 46.

INTERROGATORY NO. 64:

Please identify and describe in detail all tests and experiments conducted by defendant to determine whether or not asbestos contained within its asbestos-containing products would become airborne with normal use Include in your answer the dates, results and conclusions of each test and/or experiment.

RESPONSE TO INTERROGATORY NO. 64:

Wagner considers its brake products to be inherently safe when properly used. Therefore, Wagner would have no business reason to engage in any study such as suggested by this Interrogatory and has never done so.

INTERROGATORY NO. 65:

At any time prior to 1972 were any tests or studies conducted or sponsored by defendant to determine:

(a) The level of airborne dust or fiber concentration incident to:

(i) Arching, sanding, clipping, grinding or beveling defendant's asbestos-containing products;

(ii) Placing the products on/in motor vehicles and other machinery requiring such products;

(iii) Tearing down the product during repair and maintenance functions;