

See Answer to Interrogatory No. 43, which is incorporated herein as if fully rewritten. Test results were very good and no design changes were recommended as a result of the tests.

INTERROGATORY NO. 46:

If your Answer to Interrogatory No. 45 is "yes," with respect to each such recommended design change:

- (a) State the product or products involved;
- (b) State the test or tests involved;
- (c) State the nature of the change recommended;
- (d) Identify the person(s) making the recommendation;
- (e) State the nature and effective date of any change made; and
- (f) Identify each and every person who participated in the decision to make or not make the recommended design change.

ANSWER:

See Answers to Interrogatory Nos. 43, 44 and 45, which are incorporated herein as if fully rewritten.

INTERROGATORY NO. 47:

Identify any and all persons employed by Defendant, its predecessor or related company at any time from 1940 to date as an industrial hygienist or in a similar position.

ANSWER:

Warner Electric Brake & Clutch Company did not "employ" physicians, medical directors or industrial hygienists. Rather, Warner Electric Brake & Clutch Company used a private physician