

Roadway Express;

(ii) is the defendant in possession of any contracts or agreements for such sales. Provide a copy of same;

(iii) is the defendant in possession of any invoices for such sales. Provide a copy of same;

(iv) is the defendant in possession of any reports, memorandum or correspondence for such sales. Provide a copy of same;

ANSWER:

See Response to Interrogatory No. 21.

Interrogatory No. 23

Did the answering defendant ever sell brake shoes with asbestos containing brake linings for use as replacement parts on semi tractor trucks? If the answer is in the affirmative state the first and last year that asbestos containing brake linings were sold as replacement parts?

ANSWER:

A small number of Eaton's brake assemblies were sold in "re line kits" by Eaton's Original Equipment customers as replacement parts.

Interrogatory No. 24

Did the answering defendant ever sell brake shoes with an asbestos containing brake lining for use as replacement parts on semi trailer trucks to the below listed entities? If so provide the below listed information for each entity sold to:

(a) Ford Motor Company. If so state;

(i) the first and last date those brake shoes with asbestos containing brake linings were sold to Ford;

(ii) is the defendant in possession of any contracts or agreements for such sales. Provide a copy of same;

(iii) is the defendant in possession of any invoices for such sales. Provide a copy of same;