

1 ery of admissible evidence, and seeks confidential business
2 information which consists of trade secrets.

3 INTERROGATORY NO. 88:

4 Please state whether or not defendant's automotive
5 repair employees, in the course of repairing automobiles, use or
6 have used routers, saws, sanders, grinders, or any type device
to shape, form, cut or fabricate asbestos-containing material.

7 RESPONSE TO INTERROGATORY NO. 98:

8 Wagner is not involved in providing automotive repair
9 services.

10 INTERROGATORY NO. 89:

11 If the answer to Interrogatory No. 88 above is affir-
12 mative, please state whether any vacuum systems, dust control
13 devices, watering-down systems, or any systems designated to
reduce dust in the air were at any time used by defendant's
automobile repair employees.

14 RESPONSE TO INTERROGATORY NO. 89:

15 See Wagner's response to interrogatory No. 88.

16 INTERROGATORY NO. 90:

17 If the answer to Interrogatory No. 89 above is affir-
mative, please state:

18 (a) The date that such a device was first list-
19 ed;

20 (b) The type of system or device used;

21 (c) Whether such a system is presently used by
defendants' automobile repair employees.

22 RESPONSE TO INTERROGATORY NO. 90:

23 See Wagner's response to Interrogatory No. 89.

24 INTERROGATORY NO. 91:

25 Please state the name and address of any brake and/or
26 clutch repair facility owned and operated by defendant between
the years 1930 and 1983.

27 RESPONSE TO INTERROGATORY NO. 91:

28 None.