(d) The quantitative percentage of each chemical component of the undercoat sealer under each trade or brand name;

(e) If asbestos was included in the composition of the undercoat sealer which you manufactured under any trade or brand name, please state:

(i) The type of asbestos fiber (i.e., amosite, chrysotile, crocidolite) used in the undercoat sealer under each trade or brand name;

(ii) The quantitative percentage of asbestos fiber used in the undercoat sealer under each trade or brand name;

(iii) The years during which asbestos fiber was included in the composition of the undercoat sealer under each trade or brand name;

(f) The location of the facility (facilities) where the undercoat sealer was manufactured.

RESPONSE:

No.

INTERROGATORY NO.112:

At any time during the period 1948 to 1978, has defendant distributed automobile undercoat sealer? If so, please state

(a) The trade or brand name(s) under the which the undercoat sealer was marketed;

(b) The years during which the undercoat sealer, under each trade or brand name, was distributed;

(c) The dates each product were withdrawn from the market, if such is the case;

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