FILE NAME: Chrysler (CHR)

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Subject to said objections without waiving same, original equipment parts were distributed in new Chrysler, Plymouth, DeSoto and Dodge automobiles. Authorized replacement parts were distributed in cardboard boxes. Defendant has manufactured automobiles that may have included asbestos-containing products such as brake linings and clutch facings about which Plaintiffs complained.

Brake lining was manufactured at the Trenton Chemical Plant beginning in the 1960s and ending in 1988. Brake linings made by Defendant contained 50% chrysolite by weight and the other 50% of the brake lining contained a 50% matrix. Defendant objects to providing further information regarding the composition of its brake products because such information is confidential proprietary trade secret. Additionally, Defendant does not have specific information regarding the specific composition of the asbestos-containing friction products purchased from outside suppliers. Defendant has purchased asbestos-containing brakes from Abex Corp. (American Brake Block), Bendix Corp. (AlliedSignal), Friction Material Division, Raybestos, Raybestos-Manhattan, Johns-Manville, Nuturn, Delco, Galfer, Valeo Friction Development Products, Inland, Jurid, Well, Kelsey Hayes, Budd, Thermoid, Mintex, and Ferodo. Defendant has purchased brakes (which may have contained asbestos) from Akebono, JBI, and Perfric. Defendant's brake linings were attached to brake shoe pads. Brake parts have been sold under the trade names Mopar, Cycle-Weld, and Cycle-Bond.

With respect to the physical appearance of Chrysler brake linings, the brake lining were solid tan or gray slate. Chrysler placed indented identification marks on its brake linings. Each brake lining was marked on its edge with a letter designation indicating the name of the manufacturer of the lining, the chemical composition of the lining (indicated by a combination of letters: "FE" or "EE"), followed by numbers indicating the friction level of the lining when normal and when hot, and four digits indicating calendaring for date of manufacture. As a new product, the finished materials are date coded and identified by manufacturer. After the product is used, it eventually becomes worn and therefore indistinguishable. The Chrysler logo or emblem was stamped on the brake shoes and brake support plate produced by Chrysler. For identification purposes, color indentation appeared on the lining perpendicular to the friction surface. Chrysler has not located documentation sufficient to allow it to describe markings on parts obtained from outside suppliers.

With respect to the intended uses of the named products, brakes are intended to safely slow or stop vehicles.

Chrysler has never manufactured asbestos-containing clutches. However, Chrysler did obtain these parts from outside suppliers. At least since 1966, the suppliers of asbestos-containing automotive clutch parts for Chrysler motor vehicles were the following: Luk, Borg & Beck Division of Borg Warner, Long Co., Lipe-Rollway, and Spicer Division of Dana Corp. Replacement parts from these suppliers was sold under the Mopar brand name through authorized dealerships.

Procedure 168(5) and new Rule 190.2(c)(3), and any response herein is made subject to the foregoing objection.

(a) – (i) Defendant objects to Interrogatory No. 10 for the reason that it is overly broad, vague and ambiguous and is unlimited in scope or in time and seeks irrelevant information which is outside the scope of permissible discovery under the Texas Rule of Civil Procedure 192.3. Subject to said objections and without waiving same,

(a) – (c), (e) 1973-Service Manuals; 1983-85 Labels on cartons.

(d) "Caution: When resurfacing or refacing brake shoes follow manufacturers recommendations for proper use of their equipment. Whatever equipment is used, insure that proper ventilation is provided to remove asbestos dust, which can be detrimental to health." "Danger: Contains asbestos fibers. Avoid creating dust. Cancer and lung disease hazard." "Caution: When servicing brake assemblies or components, do not create dust by sanding, grinding or by cleaning brake parts with a dry brush or with compressed air. A water dampened cloth should be used. Many brake components contain asbestos fibers which can become airborne if dust is created during service operations. Breathing dust which contains asbestos fibers can cause serious bodily harm." "Caution: This product contains asbestos. Avoid creating dust. Breathing asbestos may result in serious bodily harm."

The following language appeared in Chrysler's 1984 service manual regarding clutch assemblies:

> CAUTION: When servicing clutch assemblies or components do NOT create dust by sanding or by cleaning clutch parts with a dry brush or with compressed air. (A water dampened cloth should be used.) The dust is created during service operations. Breathing dust containing "Asbestos Fibers" may cause serious bodily harm.

Such language has been incorporated in service manuals consistently since 1964.

(f) – (g), (i) *See* objections stated above and incorporated herein.

(h) Defendant objects to Interrogatory No. 10 to the extent it seeks information outside the scope of permissible discovery under the Texas Rule of Civil Procedure 192.3(c). Subject to said objection and without waiving same, Defendant will identify those persons with knowledge of relevant facts as required by the Rules if properly requested.

INTERROGATORY NO. 11: Identify by date issued, patent number, patent application number, and product name, every patent for asbestos free products held by, issued to, or applied for by you or by any of your employees.