(ii) the specific type of item affixed to the pallet (i.e. label, sticker, invoice, string tag);
(iii) is the defendant in possession of a specimen copy of the labeling item or a photograph thereof. If so provide a copy.
(iv) provide the sum and substance of the wording of each version of the labeling item and the dates of use.

(d) did any label, sticker, invoice, string tag on or with the pallet list any instructions about the use of a grinding wheel on the linings of the brake shoes. If yes state :

(i) state the first and last year's such item was shipped with the pallet;
(ii) the specific type of item affixed to the pallet (i.e. label, sticker, invoice, string tag);

(iii) is the defendant in possession of a specimen copy of the labeling item or a photograph thereof. If so provide a copy.

(iv) provide the sum and substance of the wording of each version of the labeling item and the dates of use.

(e) did any label, sticker, invoice, string tag on or with the pallet list any instructions about the use of a sandpaper or emery cloth on the linings of the brake shoes. If yes state :

(i) state the first and last year's such item was shipped with the pallet;

(ii) the specific type of item affixed to the pallet (i.e. label, sticker, invoice, string tag);

(iii) is the defendant in possession of a specimen copy of the labeling item or a photograph thereof. If so provide a copy.

(iv) provide the sum and substance of the wording of each version of the labeling item and the dates of use

ANSWER:

No.

Interrogatory No. 44

Did the answering defendant sell any replacement brake shoes with asbestos containing linings in cardboard boxes? If the answer is in the affirmative state:

(a) the color of each box and the years of use;