

1 1.23 If the answer to the preceding interrogatory is
2 affirmative, state:

3 (a) Into which states of the United States of
4 American such product has been distributed;

5 (b) The quantity distributed into each state of the
6 U. S. for every year of the Relevant Times;

7 (c) The name and address of each company or other
8 business entity, in the states of Washington,
and Oregon to which such product has been
distributed and the dates of the distribution.

9 ANSWER: (a) Irrelevant objection--however, S. K. Wellman believes
10 its products were distributed in the state of Washington;

(b) Unknown;

11 (c) Release of customer lists is objected to as privileged
and proprietary. There is, however, no record of any materials sold
12 to the Western Brake Co. There is a recollection of sales of metallic
friction material to Western Brake ending some time in the early 1970s.

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21 1.24 During the time period from January 1, 1950 through
22 December 31, 1978, have you, directly or indirectly, sold,
23 distributed, delivered, installed or consigned any asbestos
24 products for use in brake renovation and repair such as brake
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