

1 RESPONSE TO INTERROGATORY NO. 82:

2 No.

3 INTERROGATORY NO. 83:

4 Please state the names and addresses of all distribu-
5 tors and companies to which the defendant sold or distributed
6 asbestos or asbestos-containing products for the years 1930 to
7 1972.

8 RESPONSE TO INTERROGATORY NO. 83:

9 Wagner objects to this interrogatory on the grounds
10 that it is overly broad, unduly burdensome, and not calculated
11 to lead to the discovery of admissible evidence and seeks pro-
12 prietary business information.

13 INTERROGATORY NO. 84:

14 Please state whether defendant has knowledge of any
15 material which could be or is being used for the same purpose as
16 asbestos. Include in your answer when defendant discovered that
17 said material could be used as a substitute for asbestos.

18 RESPONSE TO INTERROGATORY NO. 84:

19 Metallic and other substances, most combined with
20 asbestos-containing substances, are now being used in brake
21 linings for front disc brake applications on some new vehicles.
22 It was first determined in 1978 that these materials could be
23 used safely for some of the same purposes as asbestos-containing
24 brake lining. However, despite a continuing effort by Wagner,
25 its suppliers, and the friction materials industry to find a
26 substance for asbestos in friction materials, no substance other
27 than asbestos-containing brake lining was available during
28 plaintiff's period of exposure which could produce friction
materials that would be safe and conform to applicable safety
standards governing brake performance for any drum brake appli-