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2 ANSWER: (a) By or under the direction of The S. K. Wellman Corp. or
its predecessors;

- 3 (b) See response to Request for Production D;
4 (c) See response to Request for Production D;
5 (d) Sales, staff, trade shows, mailings;
6 (e) Unknown.

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10 REQUEST FOR PRODUCTION D: Pursuant to CR 34, attach or
11 produce according to the above instructions a copy of each such
12 item of sales or marketing information, including but not limited
13 to books, movies, sales literature, training and/or marketing aids,
14 and an index thereto.

15 RESPONSE: See answer to Request for Production C above, including
16 attachments.

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19 1.17 State whether any of your agents, employees,
20 manufacturers, representatives or dealers during the Relevant Times
21 were instructed to advertise, solicit, sell or otherwise encourage
22 the purchase of your asbestos products or asbestos-containing
23 products for use in motor vehicle brake linings, brake pads or
24 brake facings.