ANSWER:

Objection: Defendant does not know and cannot reasonably answer this question regarding all products over the entire history of Warner Electric. Subject to and without waiving objections, products packaged in cardboard boxes were various sizes, usually tan in color. Boxes were labeled with the name "Warner Electric" or some variation that began "Warner Electric." Lettering varied over time. There was a logo, sometimes black and orange in color, with the name on the logo, sometimes with lightening bolts. The Tow Craft products were in cardboard boxes or blister packs, labeled with the Warner Electric and Tow Craft names, sometimes white letters outlined in orange. There was a written identification of the product being shipped.

INTERROGATORY NO. 28:

For each subpart below, state whether or not, to Defendant's knowledge, any items as described therein presently exist and, if so, identify any and all such existing items and state the present location of each:

(a) any product listed in response to Interrogatory No. 19, including, but not limited to, any sample, part or piece thereof;

(b) any package of the type in which any or all of the products listed in response to Interrogatory No. 19 were or would have been sold, including, but not limited to, any partial package;

(c) any catalogue, brochure, sales literature or like item referring to, relating to or reflecting any or all of the products listed in response to Interrogatory No. 19;

(d) any picture, drawing, photograph or like representation of the items described in subparts (a), (b) and/or (c) of this Interrogatory.

ANSWER:

(a) Defendant believes that the general product lines that contain friction materials are still sold today, without asbestos.

(b) Defendant is not aware of the existence of old packaging.