

any year between 1930 to 1972.

RESPONSE:

Based upon information available at this time, defendant responds that it does not believe so.

INTERROGATORY NO. 101:

Please state whether defendant possessed any ownership interest in any firm or corporation involved in the mining, processing or sale of raw asbestos, any asbestos-containing products which were domiciled, headquartered or doing business in the British Isles for any year from 1930 to 1972.

RESPONSE:

OBJECTION. Interrogatory No. 101 is objected to on the grounds that it is vague, ambiguous and unintelligible.

INTERROGATORY NO. 102:

Please state whether any business or corporation described above possessed any ownership interest in defendant from 1930 to 1972.

RESPONSE:

Not applicable.

INTERROGATORY NO. 103:

Please state when the first claim for Workers' Compensation was filed by any of the defendant's automobile repair employees or factory workers in which it was alleged that said claimant had developed:

- (a) Asbestosis;
- (b) Lung cancer;
- (c) Mesothelioma.

For each such claimant, list the date the claim was filed, the claimant's name and the state in which the claim was filed.