

RESPONSE:

See Answer to Interrogatory No. 36, which is incorporated herein as if fully rewritten.

REQUEST FOR PRODUCTION NO. 17:

Produce copies of any and all corporate memoranda regarding the decision to warn caution, caveat or describe precautions or limitations regarding usage of Defendant's asbestos-containing or respiratory products.

RESPONSE:

See Preliminary Statement and General Objections, which are incorporated herein as if fully rewritten. Defendant's document repository contains many documents, including numerous catalogs, brochures, and sales literature that provide pictures, diagrams, and information concerning manufacturing and sales of thousands of products made and/or sold by Victor Products Division. These documents are available for Plaintiffs' counsel's review at the offices of Cooper & Walinski in Toledo, Ohio.

REQUEST FOR PRODUCTION NO. 18:

Produce any and all communication and correspondence between Defendant and its employees, customers, distributors, rebranders, trade associations, and end users regarding any warning, caution, caveat, direction or information given or proposed concerning the potential hazards of, or precautions to take with asbestos or limitations to Respirator effectiveness.

RESPONSE:

See Preliminary Statement and General Objections, which are incorporated herein as if fully rewritten. Defendant's document repository contains many documents, including numerous catalogs, brochures, and sales literature that provide pictures, diagrams, and information concerning manufacturing and sales of thousands of products made and/or sold by Victor Products Division. These