

varied; The products for Ford were rear wheel fenders for tractors, and the panels for John Deere were a console for snowmobiles and for tractors a nose cap which fits in front of the hood and inner and outer roof panels.

- 7(b). As to every product of yours which you have identified in Interrogatory 7(a) above, state the specific type or types of asbestos. (i.e., crocidolite, chrysotile, amosite or any others) which your products contained. Also, give the percentage asbestos as to each product.

Ans. See answer to Interrogatory No. 7(a).

- 7(c). State the names and positions of all corporate officers or officials having responsibility for creating, directing or setting the policy of your firm with regard to whether or not your products should contain asbestos, and whether or not warnings as to the dangers of asbestos should be provided by you from 1930 to the present.

Ans. Goodyear objects to this Interrogatory on the grounds that it presumes the inclusion of asbestos in any product sold by Goodyear created a danger to a user of the product. Without waiving this objection, Goodyear answers that these products were produced during a time when asbestos was in common use for the applications intended for them.


Objecting Attorney

- 7(d). What is the name, address, and the job title of each individual who participated in the designing and preparation of manufacturing specifications for each such product identified in Interrogatory No. 7(a)?

Ans. Goodyear follows document retention policies which provide for the periodic and routine destruction of documents. Consequently, it has been unable to locate any documents which would enable it to answer this Interrogatory, but it will supplement this response in the event such documents should be found.

8. Have you at any time from 1959 through 1983 sold, delivered or supplied any "asbestos products" to any entity in Hawaii and/or Pearl Harbor?

Ans. Goodyear follows document retention policies which provide for the periodic and routine