sanction or write-up;

(c) Describe the violation and state the date(s) during which it occurred;

(d) Identify the statute, law, rule, ordinance, code or order to which the violation related;

(e) State what, if any, specific fine, penalty, or sanction was imposed;

(f) State the date in which and the manner in which said violation was corrected;

(g) Identify any and all officials of Defendant, its predecessor or its related company having knowledge or notice of said violation and state the date on which said knowledge or notice was received; and,

(h) Identify any and all documents referring to, relating to or reflecting said violation.

ANSWER: - Gleason objects to this Interrogatory as overly broad, burdensome, harassing, excessive in scope and time and incorrectly implying that its products were a health hazard. By way of further response, answering defendant responds, no.

INTERROGATORY NO. 63:

Are there any policies of insurance which provide, or might provide, coverage on behalf of any predecessor/related entity for the injuries alleged in plaintiffs' complaints? If so:

(a) Identify the insurer(s);

(b) Identify the insured(s);

(c) State the date on which the policy was first purchased and the date on which the policy expired or was terminated;

(d) Describe the coverage provided, including, but not limited to, the time period over which the policy applied, the nature of the acts, omissions and injuries covered, and whether the policy provides primary or excess coverage;

(e) State the dollar limits of the coverage provided,