(c) Identify the court / jurisdiction in which the conviction was obtained;

(d) State the penalty imposed; and,

(e) Identify any and all documents referring to, relating to, and/or reflecting the same.

ANSWER: - Not to answering defendant's knowledge.

INTERROGATORY NUMBER 68:

Has defendant and/or any predecessor/related entity and/or any person or entity acting on behalf thereof ever destroyed or otherwise disposed of, including, but limited transferring to another, any documents referring to, relating to, and/or reflecting any and/or all of the following:

(a) Asbestos;

(b) Asbestos-related disease;

(c) The hazards of asbestos;

(d) Working with and/or around asbestos (including, but not limited to, recommended practices, controls, TLVs, standards etc.);

(e) Medical monitoring of persons working with and/or around asbestos and/or otherwise exposed to asbestos;

(f) Marketing asbestos and/or asbestos-containing products;

(g) Asbestos related claims and/or litigation;

(h) The publication and/or dissemination of information concerning asbestos, asbestos-related diseases and/or the hazards of asbestos (including withholding the same);

(i) Warning, cautions and/or notices concerning asbestos, asbestos- related diseases and/or the hazards of asbestos (including withholding the same);