



SUPERIOR COURT OF WASHINGTON FOR KING COUNTY

DONALD NOLL and CANDACE NOLL,
husband and wife,

Plaintiffs,

v.

UNION CARBIDE CORPORATION, et al.,

Defendants.

No. 13-2-06781-1 SEA

**J-M MANUFACTURING
COMPANY, INC.'S OBJECTIONS
TO PLAINTIFFS' NOTICE OF
CR30(b)(6) DEPOSITION**

Defendant, J-M Manufacturing Company, Inc. (hereafter "JMM" or "Defendant"), hereby responds to Plaintiffs' Notice of CR 30(b)(6) Deposition of Defendant J-M Manufacturing Co., Inc. (hereafter "Deposition Notice") propounded by Plaintiffs Donald and Candace Noll (hereafter "Plaintiffs"). JMM will produce its person most knowledgeable as agreed upon by the parties and subject to the following objections.

GENERAL OBJECTIONS

1. Plaintiffs' Deposition Notice indicated that Plaintiffs are seeking the production of all documents responsive to an attached "Rider." No such Rider, however, was attached to the Deposition Notice. JMM, therefore, will not be responding to any such document requests.

2. Plaintiffs have not demonstrated that the information sought from JMM cannot be

1 obtained by less intrusive means. As a result, the Deposition Notice is intended solely to harass
2 and annoy JMM and to force JMM to incur unreasonable and unnecessary expense.

3 3. JMM further objects to Plaintiffs' Deposition Notice to the extent the it attempt to
4 violate the attorney-client privilege, the attorney work-product doctrine, and other privileges and
5 protections set forth in the Washington Code of Civil Procedure. JMM reserves the right to
6 assert any and all of these applicable privileges and protections during any depositions or
7 production of documents that may take place at any time and which privileges and protections
8 cannot be asserted more specifically here because of the overbroad, duplicative, unduly
9 burdensome, harassing and oppressive nature of the Deposition Notice.

10 4. JMM further objects on the grounds that the Deposition Notice seeks a person
11 most qualified on thirty-five (35) separate topics. As such, it is overbroad, burdensome and
12 harassing, especially in light of the fact that the matters about which a person most qualified is
13 sought are alleged to have occurred many decades ago and due to the passage of time, the
14 information or witnesses sought may have been lost or has become unavailable.

15 5. JMM further objects generally on the grounds that the Deposition Notice seeks
16 information which are confidential and protected proprietary and/or trade secrets.

17 6. JMM further objects to terms set forth in the Deposition Notice on the grounds
18 that although Plaintiffs purport to use terms which are defined, the definitions contained within
19 the subject Deposition Notice are vague, ambiguous, and overly broad burdensome such that
20 JMM cannot reasonably respond without resorting to speculation.

21 **RESPONSES AND OBJECTIONS TO INFORMATION SOUGHT**

22 **CATEGORY NO. 1:**

23 All information PERTAINING TO YOUR DOCUMENT retention policy.

1 **RESPONSE:**

2 JMM incorporates herein its Preliminary Statement and General Objections and
3 further objects to this request on the following specific grounds: the request is overbroad,
4 overly burdensome, lacks foundation and is not reasonably tailored to the facts of this
5 case, and seeks information and documents that are not relevant or reasonably calculated
6 to lead to the discovery of admissible evidence. JMM further objects to this request to the
7 extent that it seeks information or documents that are protected by the attorney client
8 privilege, work product doctrine or are otherwise protected.

6 **CATEGORY NO. 2:**

7 All information PERTAINING TO YOUR corporate formation, acquisitions, mergers
8 and relationships with subsidiary entities.

9 **RESPONSE:**

10 JMM incorporates herein its Preliminary Statement and General Objections and
11 further objects to this request on the following specific grounds: the request is vague,
12 overbroad, overly burdensome, lacks foundation and is not reasonably tailored to the facts
13 of this case, and seeks information and documents that are not relevant or reasonably
14 calculated to lead to the discovery of admissible evidence. JMM further objects to the
15 extent that it seeks information which is a matter of public record and which, therefore, is
16 as equally accessible to Plaintiffs as to JMM. JMM further objects to this request to the
17 extent that it seeks information or documents that are protected by the attorney client
18 privilege, work product doctrine or are otherwise protected.

15 **CATEGORY NO. 3:**

16 All information PERTAINING TO sales catalogs, brochures, specification sheets, photos,
17 films, photocopies which depict any ASBESTOS-CONTAINING PRODUCTS sold or
18 distributed by YOU.

18 **RESPONSE:**

19 JMM incorporates herein its Preliminary Statement and General Objections and
20 further objects to this request on the following specific grounds: the request is overbroad,
21 overly burdensome, lacks foundation and is not reasonably tailored to the facts of this
22 case, and seeks information and documents that are not relevant or reasonably calculated
23 to lead to the discovery of admissible evidence. JMM further objects to this request to the
24 extent that it seeks information or documents that are protected by the attorney client
25 privilege, work product doctrine or are otherwise protected.

1 **CATEGORY NO. 4:**

2 All information PERTAINING TO model number, model name or symbol of any of
3 ASBESTOS-CONTAINING PRODUCTS sold or distributed by YOU.

4 **RESPONSE:**

5 JMM incorporates herein its Preliminary Statement and General Objections and
6 further objects to this request on the following specific grounds: the request is vague,
7 overbroad, overly burdensome, lacks foundation and is not reasonably tailored to the facts
8 of this case, and seeks information and documents that are not relevant or reasonably
9 calculated to lead to the discovery of admissible evidence. JMM further objects to this
10 request to the extent that it seeks information or documents that are protected by the
11 attorney client privilege, work product doctrine or are otherwise protected.

12 **CATEGORY NO. 5:**

13 All information PERTAINING TO the packaging, name or logo associated with
14 any of ASBESTOS-CONTAINING PRODUCTS sold or distributed by YOU.

15 **RESPONSE:**

16 JMM incorporates herein its Preliminary Statement and General Objections and
17 further objects to this request on the following specific grounds: the request is vague,
18 overbroad, overly burdensome, lacks foundation and is not reasonably tailored to the facts
19 of this case, and seeks information and documents that are not relevant or reasonably
20 calculated to lead to the discovery of admissible evidence. JMM further objects to this
21 request to the extent that it seeks information or documents that are protected by the
22 attorney client privilege, work product doctrine or are otherwise protected.

23 **CATEGORY NO. 6:**

All information PERTAINING TO the sales and/or distribution of any and all
ASBESTOS and/or ASBESTOS-CONTAINING PRODUCTS which YOU sold or distributed within
the State of Washington during the RELEVANT TIME PERIOD.

RESPONSE:

JMM incorporates herein its Preliminary Statement and General Objections and
further objects to this request on the following specific grounds: the request is vague,
overbroad, overly burdensome, lacks foundation and is not reasonably tailored to the facts
of this case, and seeks information and documents that are not relevant or reasonably
calculated to lead to the discovery of admissible evidence. JMM further objects to this
request to the extent that it seeks information or documents that are protected by the
attorney client privilege, work product doctrine or are otherwise protected.

1 **CATEGORY NO. 7:**

2 All information PERTAINING TO the brand name or supplier of ASBESTOS
3 and ACP which YOU sold or distributed.

4 **RESPONSE:**

5 JMM incorporates herein its Preliminary Statement and General Objections and
6 further objects to this request on the following specific grounds: the request is overbroad,
7 overly burdensome, lacks foundation and is not reasonably tailored to the facts of this
8 case, and seeks information and documents that are not relevant or reasonably calculated
9 to lead to the discovery of admissible evidence. JMM further objects to this request to the
10 extent that it seeks information or documents that are protected by the attorney client
11 privilege, work product doctrine or are otherwise protected, and to the extent that it infers
12 that JMM sold or distributed any asbestos as JMM never sold or distributed any asbestos.

9 **CATEGORY NO. 8:**

10 All information PERTAINING TO PERSONS to whom YOU sold or distributed
11 ASBESTOS-CONTAINING PRODUCTS during or prior to the RELEVANT TIME PERIOD.

12 **RESPONSE:**

13 JMM incorporates herein its Preliminary Statement and General Objections and
14 further objects to this request on the following specific grounds: the request is
15 overbroad, overly burdensome, lacks foundation and is not reasonably tailored to the
16 facts of this case, and seeks information and documents that are not relevant or
17 reasonably calculated to lead to the discovery of admissible evidence. JMM further
18 objects to the extent that it seeks information which is a matter of public record and
19 which, therefore, is as equally accessible to Plaintiffs as to JMM. JMM further objects to
20 this request to the extent that it seeks information or documents that are protected by the
21 attorney client privilege, work product doctrine or are otherwise protected.

18 **CATEGORY NO. 9:**

19 All information PERTAINING TO PERSONS involved in the sales and/or
20 distribution of any and all of ASBESTOS-CONTAINING PRODUCTS which YOU sold or
21 distributed within the State of Washington during the RELEVANT TIME PERIOD.

22 **RESPONSE:**

23 JMM incorporates herein its Preliminary Statement and General Objections and
further objects to this request on the following specific grounds: the request is overbroad,
overly burdensome, lacks foundation and is not reasonably tailored to the facts of this
case, and seeks information and documents that are not relevant or reasonably calculated

1 to lead to the discovery of admissible evidence. JMM further objects to this request to the
2 extent that it seeks information or documents that are protected by the attorney client
3 privilege, work product doctrine or are otherwise protected, and to the extent that it seeks
4 information which is protected due to the privacy rights of JMM's employees.

5 **CATEGORY NO. 10:**

6 YOUR knowledge of the hazards of asbestos, and specifically when YOU knew that
7 asbestos could cause asbestosis, lung cancer and/or mesothelioma and how YOU learned of
8 same.

9 **RESPONSE:**

10 JMM incorporates herein its Preliminary Statement and General Objections and
11 further objects to this request on the following specific grounds: the request is vague,
12 overbroad, overly burdensome, lacks foundation and is not reasonably tailored to the facts
13 of this case, and seeks information and documents that are not relevant or reasonably
14 calculated to lead to the discovery of admissible evidence. JMM further objects to this
15 request to the extent that it seeks information or documents that are protected by the
16 attorney client privilege, work product doctrine or are otherwise protected, and to the
17 extent it calls for an expert, medical, and/or scientific opinion. JMM further objects to this
18 request on the grounds that JMM employed numerous persons throughout the course of its
19 business, any one of whom may have obtained varying degrees of knowledge regarding
20 asbestos and asbestos-related diseases at varying points in time. When JMM, as a
21 corporation, obtained any particular knowledge cannot be determined with accuracy.

22 **CATEGORY NO. 11:**

23 Any precautions and procedures undertaken by YOU with respect to the hazards of
asbestos.

RESPONSE:

JMM incorporates herein its Preliminary Statement and General Objections and
further objects to this request on the following specific grounds: the request is vague,
overbroad, overly burdensome, lacks foundation and is not reasonably tailored to the facts
of this case, and seeks information and documents that are not relevant or reasonably
calculated to lead to the discovery of admissible evidence. JMM further objects to this
request to the extent that it seeks information or documents that are protected by the
attorney client privilege, work product doctrine or are otherwise protected.

CATEGORY NO. 12:

The identity and description, sufficient for the purposes of a request for
production and/or subpoena duces tecum, of all documents in YOUR possession, custody or

1 control admissible on the issue of YOUR profits and financial condition.

2 **RESPONSE:**

3 JMM incorporates herein its Preliminary Statement and General Objections and
4 further objects to this request on the following specific grounds: the request is vague,
5 overbroad, overly burdensome, lacks foundation and is not reasonably tailored to the facts
6 of this case, and seeks information and documents that are not relevant or reasonably
calculated to lead to the discovery of admissible evidence. JMM further objects to this
request to the extent that it seeks information or documents that are protected by the
attorney client privilege, work product doctrine or are otherwise protected.

7 **CATEGORY NO. 13:**

8 The identity of any witnesses employed and/or related to YOU most competent to
9 testify to YOUR (a) current financial condition; (b) net profits; (c) ability to pay a punitive damages
award in this matter and/or (d) gross sales and the net profits derived from the sales of asbestos-
containing products between 1982 and the present.

10 **RESPONSE:**

11 JMM incorporates herein its Preliminary Statement and General Objections and
12 further objects to this request on the following specific grounds: the request is vague,
13 overbroad, overly burdensome, lacks foundation and is not reasonably tailored to the facts
14 of this case, and seeks information and documents that are not relevant or reasonably
calculated to lead to the discovery of admissible evidence. JMM further objects to this
15 request to the extent that it seeks information or documents that are protected by the
attorney client privilege, work product doctrine or are otherwise protected, and to the
16 extent that it seeks information which is protected due to the privacy rights of JMM's
employees.

17 **CATEGORY NO. 14:**

18 Knowledge about the level and content of the asbestos dust generated during the
ordinary and foreseeable installation, removal, use or repair of ACPs sold or distributed by YOU.

19 **RESPONSE:**

20 JMM incorporates herein its Preliminary Statement and General Objections and
21 further objects to this request on the following specific grounds: the request is vague,
22 overbroad, overly burdensome, lacks foundation and is not reasonably tailored to the facts
of this case, and seeks information and documents that are not relevant or reasonably
calculated to lead to the discovery of admissible evidence. JMM further objects to this
23 request to the extent that it seeks information or documents that are protected by the
attorney client privilege, work product doctrine or are otherwise protected, and to the

1 extent it calls for an expert, medical, and/or scientific opinion. JMM further objects to this
2 request on the grounds that JMM employed numerous persons throughout the course of its
3 business, any one of whom may have obtained varying degrees of knowledge regarding
asbestos and asbestos-related diseases at varying points in time. When JMM, as a
corporation, obtained any particular knowledge cannot be determined with accuracy.

4 **CATEGORY NO. 15:**

5 Precautions and procedures undertaken by YOU or YOUR employees with respect to the
6 hazards of asbestos, between 1982 and 1989.

7 **RESPONSE:**

8 JMM incorporates herein its Preliminary Statement and General Objections and
9 further objects to this request on the following specific grounds: the request is vague,
10 overbroad, overly burdensome, lacks foundation and is not reasonably tailored to the facts
11 of this case, and seeks information and documents that are not relevant or reasonably
12 calculated to lead to the discovery of admissible evidence. JMM further objects to this
request to the extent that it seeks information or documents that are protected by the
attorney client privilege, work product doctrine or are otherwise protected. JMM further
objects on the grounds that JMM did not come into existence until January 1, 1983 and
only sold A/C pipe from 1983 to 1988.

13 **CATEGORY NO. 16:**

14 Warnings/precautionary statements concerning asbestos accompanying ACPs sold or distributed
15 by YOU, including the content of any such warning/precautionary statements, the reasons for the
16 warning/precautionary statements, the dates such warnings/statements were used and/or revised, the
manner in which they accompanied the products into the stream of commerce (e.g. via package insert,
label on the product itself, etc.).

17 **RESPONSE:**

18 JMM incorporates herein its Preliminary Statement and General Objections and
19 further objects to this request on the following specific grounds: the request is vague,
20 overbroad, overly burdensome, lacks foundation and is not reasonably tailored to the facts
21 of this case, and seeks information and documents that are not relevant or reasonably
22 calculated to lead to the discovery of admissible evidence. JMM further objects to this
23 request to the extent that it seeks information or documents that are protected by the
attorney client privilege, work product doctrine or are otherwise protected.

24 **CATEGORY NO. 17:**

25 Any other manner in which YOU contend YOU warned potential users of the potential
hazards of asbestos.

1 **RESPONSE:**

2 JMM incorporates herein its Preliminary Statement and General Objections and
3 further objects to this request on the following specific grounds: the request is vague,
4 overbroad, overly burdensome, lacks foundation and is not reasonably tailored to the facts
5 of this case, and seeks information and documents that are not relevant or reasonably
6 calculated to lead to the discovery of admissible evidence. JMM further objects to this
7 request to the extent that it seeks information or documents that are protected by the
8 attorney client privilege, work product doctrine or are otherwise protected.

6 **CATEGORY NO. 18:**

7 When and how YOU actually became aware that warnings/precautionary statements were
8 to be placed on asbestos containing products.

9 **RESPONSE:**

10 JMM incorporates herein its Preliminary Statement and General Objections and
11 further objects to this request on the following specific grounds: the request is overbroad,
12 overly burdensome, lacks foundation and is not reasonably tailored to the facts of this
13 case, and seeks information and documents that are not relevant or reasonably calculated
14 to lead to the discovery of admissible evidence. JMM further objects to this request to the
15 extent that it seeks information or documents that are protected by the attorney client
16 privilege, work product doctrine or are otherwise protected. JMM further objects to this
17 request on the grounds that JMM employed numerous persons throughout the course of its
18 business, any one of whom may have obtained varying degrees of knowledge regarding
19 asbestos and asbestos-related diseases at varying points in time. When JMM, as a
20 corporation, obtained any particular knowledge cannot be determined with accuracy.

16 **CATEGORY NO. 19:**

17 All information pertaining to asbestos-related claims made against YOU, or YOUR
18 workers' compensation insurance carrier, including the date(s) filed, the alleged injuries, whether
19 or not YOU paid the claim.

19 **RESPONSE:**

20 JMM incorporates herein its Preliminary Statement and General Objections and
21 further objects to this request on the following specific grounds: the request is overbroad,
22 overly burdensome, lacks foundation and is not reasonably tailored to the facts of this
23 case, and seeks information and documents that are not relevant or reasonably calculated
to lead to the discovery of admissible evidence. JMM further objects to this request to the
extent that it seeks information or documents that are protected by the attorney client
privilege, work product doctrine or are otherwise protected, and to the extent that it seeks
information which is protected due to the privacy rights of JMM's employees.

1 **CATEGORY NO. 20:**

2 When and why YOU stopped selling, marketing and/or distributing products which used
3 or contained ASBESTOS.

4 **RESPONSE:**

5 JMM incorporates herein its Preliminary Statement and General Objections and
6 further objects to this request on the following specific grounds: the request is overbroad,
7 overly burdensome, lacks foundation and is not reasonably tailored to the facts of this
8 case, and seeks information and documents that are not relevant or reasonably calculated
9 to lead to the discovery of admissible evidence. JMM further objects to this request to the
10 extent that it seeks information or documents that are protected by the attorney client
11 privilege, work product doctrine or are otherwise protected.

12 **CATEGORY NO. 21:**

13 Medical consultations/advice sought and/or received by YOU pertaining to health
14 hazards of ASBESTOS prior to or during the time that YOU were selling, marketing and/or
15 distributing ACPs.

16 **RESPONSE:**

17 JMM incorporates herein its Preliminary Statement and General Objections and
18 further objects to this request on the following specific grounds: the request is vague,
19 overbroad, overly burdensome, lacks foundation and is not reasonably tailored to the facts
20 of this case, and seeks information and documents that are not relevant or reasonably
21 calculated to lead to the discovery of admissible evidence. JMM further objects to this
22 request to the extent that it seeks information or documents that are protected by the
23 attorney client privilege, work product doctrine or are otherwise protected.

CATEGORY NO. 22:

The identity of publications/articles/brochures/pamphlets of which YOU were aware that dealt
with asbestos-related disease, including any such information received by your client from any trade
organization, and when it became aware of that information.

RESPONSE:

JMM incorporates herein its Preliminary Statement and General Objections and
further objects to this request on the following specific grounds: the request is vague,
overbroad, overly burdensome, lacks foundation and is not reasonably tailored to the facts
of this case, and seeks information and documents that are not relevant or reasonably
calculated to lead to the discovery of admissible evidence. JMM further objects to this
request to the extent that it seeks information or documents that are protected by the

1 attorney client privilege, work product doctrine or are otherwise protected. JMM further
2 objects to this request on the grounds that JMM employed numerous persons throughout
3 the course of its business, any one of whom may have obtained varying degrees of
4 knowledge regarding publications concerning asbestos and asbestos-related diseases at
5 varying points in time. When JMM, as a corporation, obtained any particular knowledge
6 cannot be determined with accuracy

7 **CATEGORY NO. 23:**

8 The content of YOUR promotional materials (e.g. advertisements, catalogs, brochures,
9 etc.) pertaining to ACPs sold or distributed.

10 **RESPONSE:**

11 JMM incorporates herein its Preliminary Statement and General Objections and
12 further objects to this request on the following specific grounds: the request is vague,
13 overbroad, overly burdensome, lacks foundation and is not reasonably tailored to the facts
14 of this case, and seeks information and documents that are not relevant or reasonably
15 calculated to lead to the discovery of admissible evidence. JMM further objects to the
16 extent that it seeks information which is a matter of public record and which, therefore, is
17 as equally accessible to Plaintiffs as to JMM. JMM further objects to this request to the
18 extent that it seeks information or documents that are protected by the attorney client
19 privilege, work product doctrine or are otherwise protected.

20 **CATEGORY NO. 24:**

21 Any product recall notices pertaining to ACPs sold or distributed by YOU.

22 **RESPONSE:**

23 JMM incorporates herein its Preliminary Statement and General Objections and
further objects to this request on the following specific grounds: the request is vague,
overbroad, overly burdensome, lacks foundation and is not reasonably tailored to the facts
of this case, and seeks information and documents that are not relevant or reasonably
calculated to lead to the discovery of admissible evidence. JMM further objects to this
request to the extent that it seeks information or documents that are protected by the
attorney client privilege, work product doctrine or are otherwise protected.

CATEGORY NO. 25:

Any asbestos related OSHA violations by YOU or asbestos related violations by YOU of
federal or state governmental statutes, ordinances or regulations between 1982 and the present.

1 **RESPONSE:**

2 JMM incorporates herein its Preliminary Statement and General Objections and
3 further objects to this request on the following specific grounds: the request is overbroad,
4 overly burdensome, lacks foundation and is not reasonably tailored to the facts of this
5 case, and seeks information and documents that are not relevant or reasonably calculated
6 to lead to the discovery of admissible evidence. JMM further objects to the extent that it
7 seeks information which is a matter of public record and which, therefore, is as equally
8 accessible to Plaintiffs as to JMM. JMM further objects to this request to the extent that it
9 seeks information or documents that are protected by the attorney client privilege,
10 work product doctrine or are otherwise protected.

11 **CATEGORY NO. 26:**

12 YOUR membership in and/or affiliation with, including years of same, any of the following:
13 American Textile Institute (ATI), Asbestos Information Association (AIA), Industrial Health
14 Foundation or Industrial Hygiene Foundation (IHF), National Insulation Manufacturers Assn. (NIMA),
15 National Insulation Contractors Assn. (NICA), National Safety Council (NSC), American Ceramics
16 Society (ACS), National Building Materials Distributors Assn. (NIA), Sprayed Mineral Fiber
17 Manufacturers Assn. (SMFMA), Thermal Insulation Manufacturers Assn. (TIMA), Quebec Asbestos
18 Mining Assn. (QAMA), American Society of Mechanical Engineers (ASME), and/or any other trade
19 organization of which you were a member.

20 **RESPONSE:**

21 JMM incorporates herein its Preliminary Statement and General Objections and
22 further objects to this request on the following specific grounds: the request is overbroad,
23 overly burdensome, lacks foundation and is not reasonably tailored to the facts of this
case, and seeks information and documents that are not relevant or reasonably calculated
to lead to the discovery of admissible evidence. JMM further objects to this request to the
extent that it seeks information or documents that are protected by the attorney client
privilege, work product doctrine or are otherwise protected.

18 **CATEGORY NO. 27:**

19 YOUR corporate history.

20 **RESPONSE:**

21 JMM incorporates herein its Preliminary Statement and General Objections and
22 further objects to this request on the following specific grounds: the request is vague,
23 overbroad, overly burdensome, lacks foundation and is not reasonably tailored to the facts
of this case, and seeks information and documents that are not relevant or reasonably
calculated to lead to the discovery of admissible evidence. JMM further objects to the
extent that it seeks information which is a matter of public record and which, therefore, is

1 as equally accessible to Plaintiffs as to JMM. JMM further objects to this request to the
2 extent that it seeks information or documents that are protected by the attorney client
privilege, work product doctrine or are otherwise protected.

3 **CATEGORY NO. 28:**

4 Any and all documents, which relate, in any way, to health hazards or problems
5 associated with the use of ACPs sold or distributed by YOU.

6 **RESPONSE:**

7 JMM incorporates herein its Preliminary Statement and General Objections and
8 further objects to this request on the following specific grounds: the request is vague,
9 overbroad, overly burdensome, lacks foundation and is not reasonably tailored to the facts
10 of this case, and seeks information and documents that are not relevant or reasonably
calculated to lead to the discovery of admissible evidence. JMM further objects to this
request to the extent that it seeks information or documents that are protected by the
attorney client privilege, work product doctrine or are otherwise protected, and to the
extent it calls for an expert, medical, and/or scientific opinion.

11 **CATEGORY NO. 29:**

12 Knowledge regarding the ordinary and intended use of ACPs sold or distributed by YOU.

13 **RESPONSE:**

14 JMM incorporates herein its Preliminary Statement and General Objections and
15 further objects to this request on the following specific grounds: the request is vague,
16 overbroad, overly burdensome, lacks foundation and is not reasonably tailored to the facts
of this case, and seeks information and documents that are not relevant or reasonably
calculated to lead to the discovery of admissible evidence. JMM further objects to this
17 request to the extent that it seeks information or documents that are protected by the
attorney client privilege, work product doctrine or are otherwise protected.

18 **CATEGORY NO. 30:**

19 YOUR understanding of the potential health effects and risks associated with asbestos as
20 demonstrated by the development and publication of federal Occupational Safety and Health
Administration (OSHA) guidelines.

21 **RESPONSE:**

22 JMM incorporates herein its Preliminary Statement and General Objections and
23 further objects to this request on the following specific grounds: the request is vague,
overbroad, overly burdensome, lacks foundation and is not reasonably tailored to the facts

1 of this case, and seeks information and documents that are not relevant or reasonably
2 calculated to lead to the discovery of admissible evidence. JMM further objects to this
3 request to the extent that it seeks information or documents that are protected by the
4 attorney client privilege, work product doctrine or are otherwise protected. JMM further
5 objects to this request on the grounds that JMM employed numerous persons throughout
6 the course of its business, any one of whom may have obtained varying degrees of
7 knowledge regarding the potential health effects and risks associated with asbestos at
8 varying points in time. When JMM, as a corporation, obtained any particular knowledge
9 cannot be determined with accuracy

6 **CATEGORY NO. 31:**

7 All information regarding your compliance with all applicable requirements,
8 specifications and/or guidelines provided by OSHA and/or other federal or state governmental
9 authorities overseeing workplace health and safety.

9 **RESPONSE:**

10 JMM incorporates herein its Preliminary Statement and General Objections and
11 further objects to this request on the following specific grounds: the request is vague,
12 overbroad, overly burdensome, lacks foundation and is not reasonably tailored to the facts
13 of this case, and seeks information and documents that are not relevant or reasonably
14 calculated to lead to the discovery of admissible evidence. JMM further objects to the
15 extent that it seeks information which is a matter of public record and which, therefore, is
16 as equally accessible to Plaintiffs as to JMM. JMM further objects to this request to the
17 extent that it seeks information or documents that are protected by the attorney client
18 privilege, work product doctrine or are otherwise protected.

15 **CATEGORY NO. 32:**

16 All information pertaining to PERSONS with responsibility for YOUR compliance with all
17 applicable requirements, specifications and/or guidelines provided by OSHA and/or other federal or
18 governmental authorities overseeing workplace health and safety.

18 **RESPONSE:**

19 JMM incorporates herein its Preliminary Statement and General Objections and
20 further objects to this request on the following specific grounds: the request is vague,
21 overbroad, overly burdensome, lacks foundation and is not reasonably tailored to the facts
22 of this case, and seeks information and documents that are not relevant or reasonably
23 calculated to lead to the discovery of admissible evidence. JMM further objects to this
24 request to the extent that it seeks information or documents that are protected by the
25 attorney client privilege, work product doctrine or are otherwise protected.

1 **CATEGORY NO. 33:**

2 All information pertaining to any patents held by YOU, acquired by YOU, or for which
3 YOU applied, concerning YOUR ASBESTOS-CONTAINING PRODUCTS.

4 **RESPONSE:**

5 JMM incorporates herein its Preliminary Statement and General Objections and
6 further objects to this request on the following specific grounds: the request is vague,
7 overbroad, overly burdensome, lacks foundation and is not reasonably tailored to the facts
8 of this case, and seeks information and documents that are not relevant or reasonably
9 calculated to lead to the discovery of admissible evidence. JMM further objects to this
10 request to the extent that it seeks information or documents that are protected by the
11 attorney client privilege, work product doctrine or are otherwise protected.

12 **CATEGORY NO. 34:**

13 All information pertaining to studies, industrial hygiene surveys, or other testing,
14 conducted by YOU, on YOUR behalf, or by anyone else, concerning YOUR ASBESTOS-
15 CONTAINING PRODUCTS.

16 **RESPONSE:**

17 JMM incorporates herein its Preliminary Statement and General Objections and
18 further objects to this request on the following specific grounds: the request is vague,
19 overbroad, overly burdensome, lacks foundation and is not reasonably tailored to the facts
20 of this case, and seeks information and documents that are not relevant or reasonably
21 calculated to lead to the discovery of admissible evidence. JMM further objects to this
22 request to the extent that it seeks information or documents that are protected by the
23 attorney client privilege, work product doctrine or are otherwise protected.

17 **CATEGORY NO. 35:**

18 All information pertaining to studies, industrial hygiene surveys or other testing,
19 conducted by YOU, on YOUR behalf, or by anyone else, concerning the effects of inhalation of
20 ASBESTOS, including but not limited to ASBESTOS emanating from YOUR ASBESTOS-
21 CONTAINING PRODUCTS.

22 **RESPONSE:**

23 JMM incorporates herein its Preliminary Statement and General Objections and
further objects to this request on the following specific grounds: the request is vague,
overbroad, overly burdensome, lacks foundation and is not reasonably tailored to the facts
of this case, and seeks information and documents that are not relevant or reasonably

1 calculated to lead to the discovery of admissible evidence. JMM further objects to this
2 request to the extent that it seeks information or documents that are protected by the
3 attorney client privilege, work product doctrine or are otherwise protected.

4 DATED this 2nd day of August, 2013.

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CERTIFICATE OF SERVICE

The undersigned certifies under penalty of perjury under the laws of the State of Washington that on the below date, I caused to be served via email, messenger, and/or U.S. Mail, postage pre-paid, a true and correct copy of the foregoing document to the following:

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