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2 ANSWER: See Request for Production C above.
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7 1.20 If asbestos or asbestos-containing products were sold
8 to or purchased from any of the other defendants in this suit state:
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10 (a) The name of each such defendant(s);

11 (b) The date(s) of sale, purchase or rebranding of
12 each said product, including the amount and kind
of materials sold or purchased, specifying trade
names for each year of the Relevant Times;

13 (c) The name, address and job classification of the
14 individual currently having possession of such
records.

15 ANSWER: (a) See response to Interrogatory No. 1.11(g) for vendors;
16 no sales to any defendants for automobile applications;
17 (b) Irrelevant objection--burdensome and it is not presently
clear whether data is available from which to compile this information.
Investigation continuing.
18 (c) J. E. Mencini is investigating to determine if informa-
19 tion can be collected to respond to Interrogatory 1.20(b).
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21 1.21 State the names and addresses of all distributors,
22 dealers, agents or manufacturers' representatives of any of your
23 asbestos-containing products in the States of Washington, Oregon
24 and California during the period of 1950 through the present, and
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