

- (b) Labelling of these items was substantially completed in 1975 and continues to the present;
- (c) No changes have been made in the wording of the warning;
- (d) Samples of boxes are available for inspection at the office of defendant's counsel.

INTERROGATORY No. 15:

Between the years 1950 and 1969, did you purchase or otherwise acquire any asbestos-containing product line from another company. If so, please state for each such product line:

- (a) The date of the contract of sale or acquisition;
- (b) If you will do so without a motion to produce, attach a copy of each agreement to your answers;
- (c) The trade, brand and generic name of each product line acquired;
- (d) The name of the company from whom you purchased each such asbestos containing product line;
- (e) The location of any asbestos product manufacturing facilities acquired, and the type of asbestos products manufactured therein.

RESPONSE No. 15:

See response to No. 4. Otherwise, no.

INTERROGATORY No. 16:

At any time from 1949 to the present, have you had insurance against liability for the design, manufacture, distribution, and sale of asbestos-containing products?

RESPONSE No. 16: Yes.

INTERROGATORY No. 17:

If so, state: