

which were manufactured, sold, distributed, installed, applied and/or specified by Defendant and/or any predecessor /related entity, during the times alleged by plaintiff; and,

- (d) Identify each and every person known to you to knowledge and/or information concerning the same.

ANSWER:

See response to Interrogatory #2.

INTERROGATORY NO. 5:

As to each site as described in Interrogatory No. 2, for which Defendant denies that any asbestos-containing products were present, which were manufactured, sold, distributed, installed, applied and/or specified by Defendant and/or any predecessor /related entity:

- (a) Describe the basis for said denial;
- (b) State whether or not there were ever any asbestos-containing products present at said site, which were manufactured, sold, distributed, installed, applied and/or specified by Defendant and/or any predecessor /related entity, within five (5) years of the times alleged by plaintiff;
- (c) State whether or not there were ever any non-asbestos-containing products present at said site, which were manufactured, sold, distributed, installed, applied and/or specified by Defendant and/or any predecessor /related entity, during the times alleged by plaintiff;
- (d) Identify any and all documents referring to, relating to, and/or reflecting the basis for said denial; and,
- (e) Identify each and every person known to you to knowledge and/or information concerning the basis for said denial.

ANSWER:

See response to Interrogatory #2.

INTERROGATORY NO. 6:

With respect to each and every piece /type of equipment (such as a vehicle, turbine, pump, aircraft etc.) that was manufactured, sold and/or distributed by Defendant and/or any predecessor / related entity that incorporated any asbestos-containing component and which has been identified