

ANSWER:

Defendant objects to Interrogatory No. 33 to the extent it inquires of "predecessor companies" without identifying or defining such. Moreover, the interrogatory calls for a legal conclusion as to what companies are "predecessors" without setting forth a factual or legal foundation for such an opinion. Further, the interrogatory is duplicative of other interrogatories herein and seeks only to impose an undue burden upon Defendant in the form of unnecessary time, expense and manpower. The interrogatory is further overbroad, general and global in that it is not limited in time and is vague to the extent that it fails to define or limit in any way "asbestos products." Subject to and without waiving the foregoing objections, Defendant answers as follows:

Chrysotile for drum brake linings:

Asbestos Fibre Corporation Asbestos Corporation, Ltd. % C.L. Zimmerman Company N-303 Cincinnati Union Terminal Cincinnati, Ohio 45203	1939 - 1975
---	-------------

Asbestos Corporation, Ltd.	1967 - 1970
----------------------------	-------------

Johns Manville Corporation Box 517 Toledo, Ohio	1975 - 1984
---	-------------

Lake Asbestos of Quebec, Ltd. Box 608 Black Lake, Quebec	1977 - 1985
--	-------------

JM Asbestos Sales, Inc. Asbestos, Quebec	1984 - 1985
---	-------------

Chrysotile for disc brake linings:

Asbestos Corporation, Ltd.	1967 - 1970
----------------------------	-------------

Lake Asbestos	1967 - 1970
---------------	-------------