1.09 Does defendant maintain an organization table or tables? If you have answered this in the affirmative, identify the custodian of each table.

ANSWER: Yes, J. E. Mencini.

REQUEST FOR PRODUCTION B: Pursuant to CR 34, attach or produce according to the above instructions a copy of each such identified table or organization.

RESPONSE: This will be produced when satisfactory arrangements have been made between counsel to do so.

1.10 Has defendant or any of its subsidiary companies at any time engaged in the mining, manufacturing, marketing, assembling, rebranding, distributing or sale of any material or product containing asbestos fibers? See instruction 12, page 6, for definition of the terms "asbestos or asbestos product". The scope of this interrogatory includes the manufacture, distribution, assembling, marketing or sale of products into which asbestos-containing products were incorporated.