

INTERROGATORIES

PLAINTIFF'S
EXHIBIT

31782.0

INTERROGATORY NO. 1:

State the name, present business address, and capacity or title of the individual signing these Interrogatories on behalf of the answering defendant.

RESPONSE TO INTERROGATORY NO. 1:

Jack Palmer, Vice President, Wagner Electric Corporation.

INTERROGATORY NO. 2:

Please state the address of your principal place of business and whether you have assumed the assets and/or liabilities of any predecessor corporation or entity. Answer these Interrogatories for each such acquired company which manufactured products containing asbestos.

RESPONSE TO INTERROGATORY NO. 2:

Wagner Electric Corporation, 100 Misty Lane, Parsippany, New Jersey.

INTERROGATORY NO. 3:

Has defendant, at any time from 1930 to the present, engaged in the manufacture of products containing asbestos fibers?

RESPONSE TO INTERROGATORY NO. 3:

No.

INTERROGATORY NO. 4:

If the answer to Interrogatory No. 3 is yes, please state:

(a) Where the asbestos-containing product were manufactured;

(b) How long the defendant has manufactured and/or distributed asbestos-containing materials;

(c) Whether defendant has supplied manufactured asbestos materials to any other defendant herein since 1930;

(d) The dates of the transactions referred to in subsection (c);

ABEX 207.850

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WV-06411

SCF-ABEX-2845