

1. Defendant, improperly denominated as Cincinnati Grinders, Inc. Individually and as Subsidiary of Milacron, Inc. (“Defendant”), objects to these Document Requests to the extent that they seek information subject to the attorney-client privilege, information which constitutes work product and/or information which is not otherwise subject to discovery pursuant to the Ohio Rules of Civil Procedure and/or the Local Rules of the Cuyahoga Court of Common Pleas and/or the Standing Order of the Cuyahoga County Asbestos Cases Special Docket.

2. Defendant objects to the Document Requests to the extent that they seek to impose obligations upon Defendant that exceed those imposed by the Ohio Rules of Civil Procedure.

3. This action relates to an alleged specific product (asbestos-containing grinding wheels). Accordingly, Defendant objects to these Document Requests to the extent they seek information related to matters involving different products, seek information not relevant or material to the subject matter of this action and/or are not reasonably calculated to lead to the discovery of admissible evidence in this action.

4. Defendant objects to the Document Requests to the extent that they contain vague, ambiguous, conclusory and/or undefined terms.

5. Defendant objects to the Document Requests to the extent that they are overly broad, unreasonable in scope, unduly burdensome, oppressive and/or require unreasonable expense.

6. Defendant objects to the Document Requests to the extent that they are susceptible to an interpretation that makes the information sought not relevant, vague, ambiguous, overly broad, unreasonable in scope, and/or unduly burdensome.

7. Defendant objects to the Document Requests to the extent that they seek information which is confidential, proprietary and/or which constitutes trade secrets.

8. Defendant objects to the Document Requests to the extent that they seek production of any documents that are available from public records and thus, equally as available to Plaintiff as to Defendant on the grounds that any such request is unreasonable, unduly burdensome and unnecessarily expensive.

9. Defendant objects to the Document Requests to the extent they seek production of documents containing personal and private information regarding present and/or former employees of Defendant.

10. Defendant objects to the scope of the Document Requests to the extent that they are overbroad and burdensome in that they seek production of documents that significantly pre- or post-date Plaintiff's alleged injury and, as a result, Defendant will limit its production of documents to a reasonable time period preceding Plaintiff's alleged injury.

11. Defendant's investigation of this action is continuing and thus Defendant reserves the right to supplement, modify or add to its responses to the Document Requests, although Defendant does not hereby undertake to agree to do so except to the extent required by the Ohio Rules of Civil Procedure.

12. Defendant specifically incorporates these General Objections in each and every one of their objections and responses to each specific Interrogatory set forth below.

OBJECTIONS AND RESPONSES TO DOCUMENT REQUESTS

REQUEST FOR PRODUCTION NO. 1:

Please produce a true and correct copy of each photograph or picture of each asbestos-containing product that Defendant has ever mined, manufactured, sold, marketed, installed, and/or distributed.

RESPONSE:

After making a reasonable, good-faith effort to locate such documents, Defendant is unable to locate any documents responsive to this request.

REQUEST FOR PRODUCTION NO. 2:

Please produce a true and correct copy of each document which reflects sales of those asbestos-containing products listed in response to Interrogatory No. 5 to any of the job sites listed on Exhibit A, attached hereto.

RESPONSE:

After making a reasonable, good-faith effort to locate such documents, Defendant is unable to locate any documents responsive to this request.

REQUEST FOR PRODUCTION NO. 3:

Please produce a true and correct copy of each document which reflects sales of Defendant's asbestos-containing products to companies that may have distributed, packaged, labeled, and/or sold Defendant's asbestos-containing products.

RESPONSE:

After making a reasonable, good-faith effort to locate such documents, Defendant is unable to locate any documents responsive to this request.

REQUEST FOR PRODUCTION NO. 4:

Please produce a true and correct copy of each record and/or contract which reflects the sales of Defendant's asbestos-containing products to any of the job sites listed on Exhibit A, attached hereto.

RESPONSE:

After making a reasonable, good-faith effort to locate such documents, Defendant is unable to locate any documents responsive to this request.

REQUEST FOR PRODUCTION NO. 5:

Please produce a true and correct copy of each record and/or contract which reflects the sales of Defendant's asbestos-containing products to distributors and marketers who may have called on any of the job sites listed on Exhibit A, attached hereto.

RESPONSE:

After making a reasonable, good-faith effort to locate such documents, Defendant is unable to locate any documents responsive to this request.

REQUEST FOR PRODUCTION NO. 6:

Please produce a true and correct copy of each contract and/or work order that reflects contracts for Defendant to have asbestos-containing products installed or removed at any of the job sites listed on Exhibit A, attached hereto.

RESPONSE:

N/A.

REQUEST FOR PRODUCTION NO. 7:

Please produce a true and correct copy of each work order and contract that reflects contract business between Defendant and any of the job sites listed on Exhibit A, attached hereto, for the application of asbestos-containing products.

RESPONSE:

N/A.

REQUEST FOR PRODUCTION NO. 8:

Please produce a true and correct copy of each document relating to the design and preparation of the asbestos-containing products listed in Defendant's answer to Interrogatory No.5.

RESPONSE:

After making a reasonable, good-faith effort to locate such documents, Defendant is unable to locate any documents responsive to this request.

REQUEST FOR PRODUCTION NO. 9:

For each product listed in response to Interrogatory No. 5, please produce a copy of all tests that were conducted to determine any potential health hazards involved in its use or exposure (this Request for Production relates to Plaintiffs' Interrogatory No. 18 previously propounded to Defendant in this litigation).

RESPONSE:

Objection, Based upon Plaintiff, Caroline Kraszewski's deposition testimony, Caroline Kraszewski was never exposed to any asbestos-containing products sold or manufactured by Defendant. As such, this request is overly broad and unduly burdensome and not calculated to lead to the discovery of admissible evidence, without corresponding benefit to Plaintiffs. Without waiving this objection, defendant answers as follows: none.

REQUEST FOR PRODUCTION NO. 10:

Please produce a true and correct copy of all documents relating to the testing of any product which Defendant listed in response to Interrogatory No. 5 (this Request for Production relates to Plaintiffs' Interrogatory No. 19 previously propounded to Defendant in this litigation).

RESPONSE:

Objection, Based upon Plaintiff, Caroline Kraszewski's deposition testimony, Caroline Kraszewski was never exposed to any asbestos-containing products sold or manufactured by Defendant. As such, this request is overly broad and unduly burdensome and not

calculated to lead to the discovery of admissible evidence, without corresponding benefit to Plaintiffs. Without waiving this objection, Defendant answers as follows: Please see attached documents, at tab 1.

REQUEST FOR PRODUCTION NO. 11:

Please produce a true and correct copy of all tests which Defendant conducted and/or has in its possession to determine potential health hazards involved in the use of or exposure to asbestos products listed in response to Interrogatory No. 5 (this Request for Production relates to Plaintiffs' Interrogatory No. 21 previously propounded to Defendant in this litigation).

RESPONSE:

Objection, Based upon Plaintiff, Caroline Kraszewski's deposition testimony, Caroline Kraszewski was never exposed to any asbestos-containing products sold or manufactured by Defendant. As such, this request is overly broad and unduly burdensome and not calculated to lead to the discovery of admissible evidence, without corresponding benefit to Plaintiffs. Without waiving this objection, Defendant answers as follows: None.

REQUEST FOR PRODUCTION NO. 12:

Please produce a true and correct copy of all studies which Defendant conducted or caused to be conducted concerning the effects of the inhalation of asbestos dust and/or fibers in workers or other persons using, working with and/or around, installing and/or applying any of the asbestos products mined, manufactured, sold, distributed, marketed, installed and/or relabelled for distribution by Defendant or Defendant's predecessor (this Request for Production relates to Plaintiffs' Interrogatory No. 22 previously propounded to Defendant in this litigation).

RESPONSE:

Objection, Based upon Plaintiff, Caroline Kraszewski's deposition testimony, Caroline Kraszewski was never exposed to any asbestos-containing products sold or manufactured by Defendant. As such, this request is overly broad and unduly burdensome and not calculated to lead to the discovery of admissible evidence, without corresponding benefit to Plaintiffs. Without waiving this objection, Defendant answers as follows: None.

REQUEST FOR PRODUCTION NO. 13:

Please produce a true and correct copy of all documents relating to any studies made or caused to be made by Defendant, to determine whether the asbestos-containing products mined, manufactured, sold, marketed, installed or distributed by Defendant or Defendant's predecessor would be hazardous to people (this Request for Production relates to Plaintiffs' Interrogatory No. 23 previously propounded to Defendant in this litigation).

RESPONSE:

Objection, Based upon Plaintiff, Caroline Kraszewski's deposition testimony, Caroline Kraszewski was never exposed to any asbestos-containing products sold or manufactured by Defendant. As such, this request is overly broad and unduly burdensome and not calculated to lead to the discovery of admissible evidence, without corresponding benefit to Plaintiffs. Without waiving this objection, Defendant answers as follows: None.

REQUEST FOR PRODUCTION NO. 14:

Please produce a true and correct copy of all tests in the field which Defendant conducted or caused to be conducted to determine the nature and extent of asbestos dust and/or fiber exposure to insulators, applicators, fellow employees or other workers removing and/or tearing out asbestos-containing products (this Request for Production relates to Plaintiffs' Interrogatory No. 24 previously propounded to Defendant in this litigation).

RESPONSE:

Objection. Based upon Plaintiff, Caroline Kraszewski's deposition testimony, Caroline Kraszewski was never exposed to any asbestos-containing products sold or manufactured by Defendant. As such, this request is overly broad and unduly burdensome and not calculated to lead to the discovery of admissible evidence, without corresponding benefit to Plaintiffs. Without waiving this objection, Defendant answers as follows: None.

REQUEST FOR PRODUCTION NO. 15:

Please produce a true and correct copy of each test which Defendant conducted or caused to be conducted regarding the quantity, quality, or threshold limit value of asbestos dust, fibers, and/or particles to which workers were exposed while using, working with and/or around, installing and/or applying Defendant's asbestos-containing products (this Request for Production relates to Plaintiffs' Interrogatory No. 31 previously propounded to Defendant in this litigation).

RESPONSE:

Objection, Based upon Plaintiff, Caroline Kraszewski's deposition testimony, Caroline Kraszewski was never exposed to any asbestos-containing products sold or manufactured by Defendant. As such, this request is overly broad and unduly burdensome and not calculated to lead to the discovery of admissible evidence, without corresponding benefit to Plaintiffs. Without waiving this objection, Defendant answers as follows: Please see attached documents, at tab 1.

REQUEST FOR PRODUCTION NO. 16:

For each product listed in response to Interrogatory No. 5, please produce a true and correct copy of all promotional or sales material including, but not limited to, brochures, pamphlets, catalogs, packaging, or other written materials of any kind or character.

RESPONSE:

Objection, Based upon Plaintiff, Caroline Kraszewski's deposition testimony, Caroline Kraszewski was never exposed to any asbestos-containing products sold or manufactured by Defendant. As such, this request is overly broad and unduly burdensome and not calculated to lead to the discovery of admissible evidence, without corresponding benefit to Plaintiffs. Without waiving this objection, Defendant answers as follows: After making a reasonable, good-faith effort to locate such documents, Defendant is unable to locate any documents responsive to this request.

REQUEST FOR PRODUCTION NO. 17:

Please produce a true and correct copy of all warnings, cautions, caveats or directions concerning the possible health effects of the products listed in response to Interrogatory No. 5 (this Request for Production relates to Plaintiffs' Interrogatory No. 41 previously propounded to Defendant).

RESPONSE:

Objection, Based upon Plaintiff, Caroline Kraszewski's deposition testimony, Caroline Kraszewski was never exposed to any asbestos-containing products sold or manufactured by Defendant. As such, this request is overly broad and unduly burdensome and not calculated to lead to the discovery of admissible evidence, without corresponding benefit to Plaintiffs. Without waiving this objection, Defendant answers as follows: Please see attached documents, at tab 2.

REQUEST FOR PRODUCTION NO. 18:

Please produce a true and correct copy of all written materials prepared by Defendant or Defendant's predecessors or any of Defendant's subsidiaries indicating how the products listed in response to Interrogatory No. 5 should be used or maintained by the ultimate user (this request for Production relates to Plaintiffs' Interrogatory No. 43 previously propounded to Defendant).

RESPONSE:

Objection, Based upon Plaintiff, Caroline Kraszewski's deposition testimony, Caroline Kraszewski was never exposed to any asbestos-containing products sold or manufactured by Defendant. As such, this request is overly broad and unduly burdensome and not calculated to lead to the discovery of admissible evidence, without corresponding benefit to Plaintiffs. Without waiving this objection, Defendant answers as follows: Please see attached documents, at tab 3.

REQUEST FOR PRODUCTION NO. 19:

Please produce a true and correct copy of all notices received by Defendant prior to 1968 that any person was claiming injury or had sustained an abnormal x-ray reading as a result of

using asbestos-containing products mined, manufactured, sold, marketed, installed, or distributed by Defendant (this Request for Production relates to Plaintiffs' Interrogatory No. 48 previously propounded to Defendant).

RESPONSE:

None.

REQUEST FOR PRODUCTION NO. 20:

Please produce a true and correct copy of statements from all people with knowledge of relevant facts to this lawsuit.

RESPONSE:

Objection. This request is overly broad, unduly burdensome and not calculated to lead to the discovery of admissible evidence. The request also calls for documents protected by the work-product privilege. Without waiving this objection, Defendant answers as follows: None.

REQUEST FOR PRODUCTION NO. 21:

Please produce a true and correct copy of all documents which mention, allude or refer to tests performed on breathing devices to prevent the inhalation of asbestos dust and/or fibers (this Request for Production relates to Plaintiffs' Interrogatory No. 52 previously propounded to Defendant).

RESPONSE:

Objection, Based upon Plaintiff, Caroline Kraszewski's deposition testimony, Caroline Kraszewski was never exposed to any asbestos-containing products sold or manufactured by Defendant. As such, this request is overly broad and unduly burdensome and not calculated to lead to the discovery of admissible evidence, without corresponding benefit to Plaintiffs. Without waiving this objection, Defendant answers as follows: None.

REQUEST FOR PRODUCTION NO. 22:

Please produce a true and correct copy of all reports by experts that Defendant may call upon at the trial of this case (this Request for Production relates to Plaintiffs' Interrogatory No. 53 previously propounded to Defendant).

RESPONSE:

Objection. Defendant will produce such expert witness reports in accordance with the standing order, local rules, Ohio Civil Rules and any court scheduling orders.

REQUEST FOR PRODUCTION NO. 23:

Please produce a true and correct copy of all policies of insurance under which any person carrying on an insurance business may be liable to satisfy part or all of a judgment which may be entered in the action or to indemnify or reimburse for payments made to satisfy the judgment.

RESPONSE:

Will timely supplement.

REQUEST FOR PRODUCTION NO. 24:

Please produce a true and correct copy of all notices received by Defendant prior to 1968 that any person was claiming an injury or had sustained an abnormal x-ray reading as a result of using asbestos-containing products, regardless of the manufacturer or seller of the products.

RESPONSE:

Objection, Based upon Plaintiff, Caroline Kraszewski's deposition testimony, Caroline Kraszewski was never exposed to any asbestos-containing products sold or manufactured by Defendant. As such, this request is overly broad and unduly burdensome and not calculated to lead to the discovery of admissible evidence, without corresponding benefit to Plaintiffs. In addition, the request requests information which could contain confidential information regarding Defendant's employees. Without waiving this objection, Defendant answers as follows: None.

REQUEST FOR PRODUCTION NO. 25:

Please produce a true and correct copy of all documents, correspondence or communications pertaining to all marketing, sales, negotiations, delivery or distribution of all of your asbestos-containing or industrial insulation products to all Defendants to this lawsuit other than the answering Defendant.

RESPONSE:

After making a reasonable, good-faith effort to locate such documents, Defendant is unable to locate any documents responsive to this request.

REQUEST FOR PRODUCTION NO. 26:

Please produce a true and correct copy of all documents memorializing or referring, relating or pertaining to communications or correspondence among and/or between your officers, director, agents, representatives, employees or consultants and any employer, purchaser or user of your asbestos-containing products, its officers, directors, agents, representatives, employees or consultants which in any way relates, refers or pertains to asbestos, asbestos-containing products, pneumoconiosis, asbestos-related illness, injury or disease, dust or workplace health or safety.

RESPONSE:

Objection. This request is overly broad, unduly burdensome and not calculated to lead to the discovery of admissible information. In addition, the request potentially asks for privileged and/or confidential information. Notwithstanding this objection, please see attached documents, at tab 4.

REQUEST FOR PRODUCTION NO. 27:

Please produce a true and correct copy of all annual reports of Defendant to employees or stock holders for the years 1960 through 1969 and for the past five years.

RESPONSE:

Objection. The documents requested herein are public records. As such, they are equally available to Plaintiffs as they are to Defendant.

REQUEST FOR PRODUCTION NO. 28:

Please produce the originals or true and correct copies of all safety or health manuals, pamphlets or brochures issued by Defendant between 1930 and the present and any documents relating to whom said manuals were issued.

RESPONSE:

Objection. This request is overly broad, unduly burdensome and not calculated to lead to the discovery of admissible information. Without waiving said objections, there are no documents which are relevant to this lawsuit

REQUEST FOR PRODUCTION NO. 29:

Please produce a true and correct copy of all safe workplace practices manuals, pamphlets or brochures issued by Defendant from 1900 through the present.

RESPONSE:

Objection. This request is overly broad, unduly burdensome and not calculated to lead to the discovery of admissible information. Without waiving said objections, please see attached documents, at tab 5.

REQUEST FOR PRODUCTION NO. 30:

Please produce a true and correct copy of all documents referring, relating or pertaining to the Industrial Health Foundation or the Industrial Hygiene Foundation in the custody, possession or control of Defendant.

RESPONSE:

None.

REQUEST FOR PRODUCTION NO. 31

Please produce a true and correct copy of all documents referring, relating or pertaining to the Trudeau Institute and Saranac Lake Laboratory in the custody, possession or control of Defendant.

RESPONSE:

None.

REQUEST FOR PRODUCTION NO. 32:

Please produce a true and correct copy of all documents referring, relating or pertaining to the Quebec Asbestos Mining Association (QAMA) in the custody, possession or control of Defendant.

RESPONSE:

None.

REQUEST FOR PRODUCTION NO. 33:

Please produce a true and correct copy of all documents referring, relating or pertaining to the National Insulation Manufacturers Association (NIMA) in the custody, possession or control of Defendant.

RESPONSE:

None.

REQUEST FOR PRODUCTION NO. 34:

Please produce a true and correct copy of all documents referring, relating or pertaining to the Thermal Insulation Manufacturers Association (TIMA) in the custody, possession or control of Defendant.

RESPONSE:

None.

REQUEST FOR PRODUCTION NO. 35:

Please produce a true and correct copy of all documents relating to any conferences, symposia, or meetings attended by any of your officers, physicians, agents, servants, employees or consultants which in any way considered, discussed, reviewed or made recommendations concerning asbestos-related illness, injury or disease; pneumoconiosis; occupational lung disease; dust; industrial hygiene; and/or worker or workplace health or safety.

RESPONSE:

None.

REQUEST FOR PRODUCTION NO. 36:

Please produce a true and correct copy of all documents to and/or from Defendant and any person, organization, institution, laboratory, foundation, corporation, entity, board or consultants which refer, relate or pertain to air quality studies, dust counts or dust studies, alleged maximum allowable concentrations (MAC), alleged threshold limit values (TLV) or protection of your employees or any other employees or persons from actual or alleged hazards associated with asbestos exposure.

RESPONSE:

Objection. This request is overly broad, unduly burdensome and not calculated to lead to the discovery of admissible information. Without waiving said objections, please see attached documents, at tab 1.

REQUEST FOR PRODUCTION NO. 37:

Please produce a true and correct copy of all documents to and/or from Defendant and any person, organization, institution, laboratory, foundation, corporation, entity, board or consultants which refer, relate or pertain to air quality studies, dust counts or dust studies, alleged maximum allowable concentrations (MAC), alleged threshold limit values (TLV) or protection of your employees or any other employees or persons.

RESPONSE:

Objection. This request is overly broad, unduly burdensome and not calculated to lead to the discovery of admissible information. Without waiving said objections, please see attached documents, at tab 1.

REQUEST FOR PRODUCTION NO. 38:

Please produce a true and correct copy of all documents to and/or from Defendant involving any physician, industrial hygienist or public health specialist which in any way relates, refers or pertains to asbestos-related injury, illness or disease, pneumoconiosis, occupational lung disease, dust, industrial hygiene or worker or workplace health or safety.

RESPONSE:

Objection. This request is overly broad, unduly burdensome and not calculated to lead to the discovery of admissible information. Without waiving said objections, please see attached documents, at tab 1.

REQUEST FOR PRODUCTION NO. 39:

Please produce a true and correct copy of all photographs, pictures, prints or any visual depiction at any time generated showing workers or any person or persons installing, applying, removing or in any manner handling or utilizing an asbestos-containing product at any time manufactured, sold or distributed by Defendant.

RESPONSE:

None.

REQUEST FOR PRODUCTION NO. 40:

Please produce a true and correct copy of all documents pertaining to the acquisition, purchase or sale by Defendant of any asbestos-containing product manufacturing facility of asbestos-containing product or product line.

RESPONSE:

None.

REQUEST FOR PRODUCTION NO. 41:

Please produce a true and correct copy of all documents pertaining to the acquisition, purchase or sale by Defendant of any asbestos-containing product from any other Defendant in this case or to any other Defendant in this case.

RESPONSE:

None.

REQUEST FOR PRODUCTION NO. 42:

For each and every affirmative defense asserted in Defendant's Answer to Plaintiff's Complaint, the cross-claims or counter-claims of any party against Defendant, produce each and

every document which will be offered to prove each and every affirmative defense. For each and every allegation of Defendant in cross-claims(s) asserted by Defendant in this litigation, produce each and every document which will be offered to prove each and every allegation in Defendant's cross-claim(s).

RESPONSE:

Objection. This request is overly broad, unduly burdensome and not calculated to lead to the discovery of admissible information. In addition, affirmative defenses are plead prospectively and are subject to further discovery.

REQUEST FOR PRODUCTION NO. 43:

Please produce a true and correct copy of every transcript of testimony of each witness Defendant intends to call at trial.

RESPONSE:

Objection. This request is overly broad, unduly burdensome, unnecessarily expensive, and requests information which is equally available to plaintiffs as defendant. Defendant also objects to this request to the extent it calls for information protected by the attorney-client and/or work product privileges.

REQUEST FOR PRODUCTION NO. 44:

Please produce a true and correct copy of each and every record in the custody, possession or control of Defendant relating to Plaintiffs in this case other than those medical records produced by Plaintiffs and provided to Defendants in this case.

RESPONSE:

None.

REQUEST FOR PRODUCTION NO. 45:

Please produce a true and correct copy of each and every document or other tangible item upon which Defendant will rely for impeachment or rebuttal purposes in the trial of this matter.

RESPONSE:

Objection. It is impossible to predict what information will be used to rebut or impeach testimony in this matter. Furthermore, this request seeks to impose obligations upon Defendant in excess of that required under Ohio law.

REQUEST FOR PRODUCTION NO. 46:

Please produce a true and correct copy of each and every document, recording or other tangible item that constitutes in whole or in part a statement by Plaintiffs or a statement by any of Plaintiff's witnesses in this matter.

RESPONSE:

Objection. This request is overly broad, unduly burdensome, unnecessarily expensive, and requests information which is equally available to plaintiffs as defendant. Defendant also objects to this request to the extent it calls for information protected by the work product privileges. Without waiving this objection, none.

REQUEST FOR PRODUCTION NO. 47:

Please produce a true and correct copy of each and every photograph, videotape recording or other tangible item that is a photographic representation of Plaintiffs in this matter.

RESPONSE:

Objection. Defendant also objects to this request to the extent it calls for information protected by the work product privilege. Without waiving this objection, none

REQUEST FOR PRODUCTION NO. 48:

Please produce a true and correct copy of all work records or other tangible items relating to Plaintiffs or their employers.

RESPONSE:

Objection. This request is overly broad, unduly burdensome, unnecessarily expensive, and requests information which is equally available to plaintiffs as defendant. Defendant also objects to this request to the extent it calls for information protected by the work product privilege. Without waiving this objection, none

REQUEST FOR PRODUCTION NO. 49:

Please produce a true and correct copy of every transcript, affidavit or sworn statement by each and every witness called by Defendant in any litigation related to insurance that may cover the claims in this case.

RESPONSE:

Objection. This request is overly broad, unduly burdensome, unnecessarily expensive, not calculated to lead to the discovery of admissible evidence, and requests information which is equally available to plaintiffs as defendant. Defendant also objects to this request to the extent it calls for information protected by the attorney-client and/or work product privileges.

REQUEST FOR PRODUCTION NO. 50:

For each document for which any privilege is asserted, produce an index containing the following information:

- (a) Author of document;
- (b) Position, title or affiliation of author;
- (c) Date of document;
- (d) Each recipient of the document;
- (e) The position, title or affiliation of each recipient of the document;
- (f) The subject matter of the document with sufficient specificity to determine the matters discussed therein; and
- (g) The privilege(s) asserted.

RESPONSE:

Objection. This interrogatory seeks to impose requirements upon Defendant that are in excess of that required by Ohio law.

REQUEST FOR PRODUCTION NO. 51:

If Defendant claims that the documents are too voluminous to produce as requested, provide the following:

- (a) The numerical amount of documents responsive to requests herein;
- (b) The method of storage of documents responsive to requests herein;
- (c) The method of organization of documents responsive to requests herein;
- (d) The location of documents responsive to requests herein;
- (e) Whether there is an index or indices, lists, inventories, or other such information for records responsive to requests herein;
- (f) If there is an index, indices, lists, inventories or other such information for records responsive to requests herein, whether such index, indices, lists, inventories or other such information for records responsive herein is printed, or electronically stored (*i.e.* listed in a computer, imaged, part of a database, etc.);
- (g) In the index, indices, lists, inventories or other such information for records responsive to requests herein, whether such index, indices, lists, inventories or other such information for records responsive herein is electronically stored (*i.e.* listed in a computer, imaged, part of a database, etc.), the method of such storage and software used to create and/or maintain said index, indices, lists, inventories or other such information for records responsive to requests herein, whether such index, indices, lists, inventories or other such information for records responsive herein.

RESPONSE:

Objection. This interrogatory seeks to impose requirements upon Defendant that are in excess of that required by Ohio law. Furthermore, although Plaintiff has propounded requests that are overly broad and/or too voluminous, no documents, at this time, have been withheld which are in the possession of Defendant on the grounds that the request is too voluminous.

REQUEST FOR PRODUCTION NO. 52:

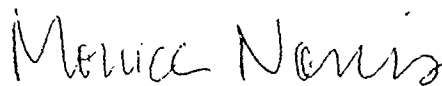
If any answer to requests herein is subject to an ongoing investigation or continuing discovery, provide the following information:

- (a) The person or persons responsible for the ongoing investigation or continuing discovery;
- (b) The means or methods used or being used for the ongoing investigation or continuing discovery;
- (c) The beginning date of such ongoing investigation or continuing discovery.

RESPONSE:

Objection. Every request is subject to on-going investigation. As such, this request is overly broad, unduly burdensome, and not calculated to lead to the discovery of admissible evidence.

Respectfully submitted,



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CERTIFICATE OF SERVICE

This is to certify that a copy of the foregoing has been served on the following by
facsimile and overnight service on July 21, 2001:

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