all documents referring to, relating to, and/or reflecting the same:

(a) Asbestos;

(b) Asbestos-related disease;

(c) The hazards of asbestos;

(d) Working with and/or around asbestos (including, but not limited to, recommended practices, controls, TLVs, standards etc.);

(e) Medical monitoring of persons working with and/or around asbestos and/or otherwise exposed to asbestos;

(f) Marketing asbestos and/or asbestos-containing products;

(g) Asbestos related claims and/or litigation;

(h) The publication and/or dissemination of information concerning asbestos, asbestos-related diseases and/or the hazards of asbestos (including withholding the same);

(i) Warning, cautions and/or notices concerning asbestos, asbestos- related diseases and/or the hazards of asbestos (including withholding the same);

(j) Government proceedings and/or actions regulating asbestos (including proposals to do so);

(k) Medical/scientific information and/or research concerning

(l) asbestos, asbestos-related diseases, working with and/or around asbestos, and/or the hazards of asbestos;

(m) Occupational health and safety / industrial hygiene (as they concern asbestos, asbestos-related diseases, working with and/or around asbestos, and/or the hazards of asbestos).

ANSWER: - Gleason objects to this Interrogatory as overly broad, burdensome, harassing, excessive in scope and time and incorrectly implying that its products were a health hazard. By way of further response, see documents provided.

By way of further response, Gleason has been involved