61. Prior to 1972, had you ever been named as a defendant in any other action in which damages were sought for personal injuries, sickness or death, as a result of use of your asbestos product? If so, state:

(a) What products were involved.

(b) The name of the court, the docket number and each party to the lawsuit.

(c) The date the action was filed.

(d) The judgment that was rendered in the action.

(e) The date set for trial of any action not yet concluded.

(f) State the terms by which any settlement was arrived at and disposition of any such aforementioned legal action.

Ans. No

62. If any employee or officer of defendant has testified (1) at trial or by deposition in any asbestos-related workers' compensation proceeding or litigation prior to 1972, or (2) before any Congressional Committee or administrative agency concerning asbestos exposure, pulmonary or asbestos-related diseases or industrial hygiene relating to asbestos use, state:

(a) The name, address and title of each person who testified.

(b) The date, location and forum of such testimony.

(c) Whether defendant has a copy of such testimony.

(d) Whether defendant will voluntarily produce such testimony.

Ans. N/A

63. Prior to 1972, state whether any claims (other than workers' compensation claims or lawsuits) have been made against the defendant concerning any injury or disease caused by asbestos exposure and as to each claim, state the name and address of the claimant, the date of the claim, the forum, if any, in which such claim was made and the disposition of each claim.

Ans. No