Has Defendant or any of its predecessor or subsidiary companies at any time engaged in the mining and subsequent sale of material containing asbestos fibers? If so, identify the location of the mine(s), the years of its operation, the type of asbestos mined and whether you sold any asbestos to any other Defendants in this case.

ANSWER:

See Preliminary Statement and General Objections, which are incorporated herein as if fully rewritten. Subject to and without waiving objections, no.

INTERROGATORY NO. 4:

Identify by name each product containing asbestos fibers that Defendant or any of its predecessor or subsidiary companies at any time manufactured or sold.

ANSWER:

See Preliminary Statement and General Objections, which are incorporated herein as if fully rewritten. Without the identification of a specific gasket product, defendant is not able to reasonably respond to the entirety of this interrogatory. If plaintiffs identify an asbestos-containing product to which they claim exposure, defendant will provide available information requested about the product. Victor Products Division made thousands of different gaskets that varied in many ways, to include: size, shape; physical characteristics according to type of engine, size of engine, number of cylinders, make of engine, year and model of engine. Brand names for Victor Products Division gasket materials included Victor, Victopac, Victocor, Victoprene, Asbestopac, Asbestoprene, Bestocork, Solicor, Corpac, Corbestos, and Victor.

INTERROGATORY NO. 5:

Identify by name each product containing asbestos fibers that Defendant or any of its predecessor or subsidiary companies at any time marketed or sold.