

INTERROGATORY NO. 7:

With respect to each corporation, company, business or joint venture identified in response to Interrogatory No. 6 state [for the period 1930-1980]:

- (a) The type of business, conducted by such related company;
- (b) The past and present business relationship(s) between said related company and Defendant;
- (c) The nature of the products or services which Defendant has sold to, or purchased from, said related company;
- (d) Whether or not said related company advertises or has advertised products or services supplied by Defendant;
- (e) Whether or not said related company sells or has sold Defendant's products or services within the State of Illinois and, if so, the approximate value of those sales from 1930 to date;
- (f) Whether or not said related company pays taxes of any type to the State of Illinois or to any political subdivision thereof and, if so, the type of taxes paid;
- (g) Whether or not Defendant controls or has controlled, directly or indirectly, in whole or in part, said related company's advertising; and,
- (h) The identity of any past or present officer or director of Defendant who, at any time, served as an officer or director of said related company.

ANSWER:

See Answer to Interrogatory No. 6, which is incorporated herein as if fully rewritten. Defendant objects to providing information for entities listed in Answer to Interrogatory No. 6 if the entities (1) are separate legal entities not defendants in the case or (2) did not manufacture or sell asbestos-containing products in the United States. Subject to and without waiving objections, no international subsidiaries paid taxes to the State of Illinois. The businesses listed in response to Interrogatory No. 6 were all manufacturing and/or sales businesses.