

1 Does defendant maintain an organization table or
 2 have answered this in the affirmative, identify the
 3 table.

4 ~~Joseph E. Mancini.~~

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 10 ~~FOR~~ FOR PRODUCTION B: Pursuant to CR 34, attach or
 11 produce according to the above instructions a copy of each such
 12 identified table or organization.

13 ~~RESPONSE:~~ ~~it~~ will be produced when satisfactory arrangements have been made
 14 between counsel to do so.

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 18 1.10 Has defendant or any of its subsidiary companies at
 19 any time engaged in the mining, manufacturing, marketing,
 20 assembling, rebranding, distributing or sale of any material or
 21 product containing asbestos fibers? See instruction 12, page 6,
 22 for definition of the terms "asbestos or asbestos product". The
 23 scope of this interrogatory includes the manufacture, distribution,
 24 assembling, marketing or sale of products into which
 25 asbestos-containing products were incorporated.

26 PLAINTIFF'S FIRST INTERROGS, ETC. - 11