

**IN RE: ALL ASBESTOS-RELATED
PERSONAL INJURY OR DEATH CASES
FILED OR TO BE FILED IN DALLAS
COUNTY, TEXAS**

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**IN THE CIVIL COURTS AND
COUNTY COURTS AT LAW
OF DALLAS COUNTY, TEXAS**

**DEFENDANT GENERAL ELECTRIC'S
RESPONSES AND OBJECTIONS TO PLAINTIFFS'
MASTER INTERROGATORIES AND REQUESTS FOR PRODUCTION**

COMES NOW Defendant General Electric Company ("GE") and files its Responses and
Objections to Plaintiffs' Master Interrogatories and Requests for Production.

Respectfully submitted,

THOMPSON & KNIGHT L.L.P.

By: *Rachelle H. Glazer*
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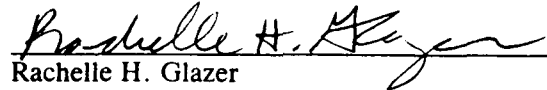
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**ATTORNEYS FOR DEFENDANT,
GENERAL ELECTRIC COMPANY**

CERTIFICATE OF SERVICE

This is to certify that a true and correct copy of the foregoing was furnished Mr. Ben DuBose, Baron & Budd, 3102 Oak Lawn, Suite 1100, Dallas, Texas, 75219, by hand delivering same this 11th day of October, 2000.


Rachelle H. Glazer

INTERROGATORIES

INTERROGATORY NO. 1.:

State the name, address, job title, length of time employed by Defendant, and a year-by-year list of all other positions, titles, or jobs held when working for Defendant of each person who has supplied any information used in answering these interrogatories.

ANSWER: GE objects to plaintiff's discovery on the grounds that it is overly broad, unreasonably burdensome, not reasonably tailored to the issues of the case, and not reasonably calculated to lead to the discovery of admissible evidence. Plaintiff's discovery should be product and defendant specific, and limited to plaintiff's places of employment and corresponding time periods. In this case, plaintiffs have alleged exposure to GE land-based steam turbines and its responses are accordingly directed to those products. Further, GE objects to the extent plaintiff's discovery goes beyond the scope of the exposure that plaintiff himself has alleged. GE is a large, decentralized company whose products and businesses change constantly. Due to its size and the fact that it has facilities in numerous states and foreign countries, there is no central repository for information of the type sought by way of the discovery. GE no longer has, or never had, many of the documents apparently required to answer this discovery. In light of the over-breadth of plaintiff's inquiries, it is essentially impossible for GE to conduct a search for the information sought and GE therefore objects. GE also objects to plaintiff's discovery to the extent it potentially calls for the disclosure of privileged and confidential information protected by the attorney client privilege, the work product doctrine, trade secrets, and other exclusions from discovery. It is impossible for GE to make any more specific privilege objections due to the overbreadth of this discovery and due to other objectionable aspects of the discovery.

Subject to the foregoing objections, the responses hereto were prepared by counsel for GE based upon counsel's investigation. GE is a large, decentralized corporation with facilities in numerous states and foreign countries. It is impossible to identify or even to discover all of the persons who, over the years, may have supplied information, no matter how indirectly or remotely, that ultimately was used in the answers to these Interrogatories.

INTERROGATORY NO. 2.:

State whether or not you are a corporation. If so, state your correct corporate name, the state of your incorporation, the address of your principal place of business, the name and address of the person or entity authorized to accept service of process on your behalf, and whether or not you have ever held a Certificate of Authority to do business in the State of Texas.

ANSWER: GE objects to plaintiff's discovery on the grounds that it is overly broad, unreasonably burdensome, not reasonably tailored to the issues of the case, and not reasonably calculated to lead to the discovery of admissible evidence. Plaintiff's discovery should be product and defendant specific, and limited to plaintiff's places of employment and corresponding time periods. In this case, plaintiffs have alleged exposure to GE land-based steam turbines and its responses are accordingly directed to those products. Further, GE objects to the extent plaintiff's discovery goes beyond the scope of the exposure that plaintiff himself has alleged. GE is a large, decentralized company whose products and businesses change constantly. Due to its size and the fact that it has facilities in numerous states and foreign countries, there is no central repository for information of the type sought by way of the discovery. GE no longer has, or never had, many of the documents apparently required to answer this discovery. In light of the over-breadth of plaintiff's inquiries, it is essentially impossible for GE to conduct a search for the information sought and GE therefore objects. GE also objects to plaintiff's discovery to

the extent it potentially calls for the disclosure of privileged and confidential information protected by the attorney client privilege, the work product doctrine, trade secrets, and other exclusions from discovery. It is impossible for GE to make any more specific privilege objections due to the overbreadth of this discovery and due to other objectionable aspects of the discovery.

Subject to the foregoing objections, GE states that its registered corporate name is General Electric Company. GE was incorporated under the laws of the State of New York in the 1890s. Its principal place of business is 1 River Road, Schenectady, New York, 12345. GE is and has been authorized to do business in the State of Texas.

INTERROGATORY NO. 3.:

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 Defendants in the Dallas County asbestos litigation.

ANSWER: GE objects to plaintiff's discovery on the grounds that it is overly broad, unreasonably burdensome, not reasonably tailored to the issues of the case, and not reasonably calculated to lead to the discovery of admissible evidence. Plaintiff's discovery should be product and defendant specific, and limited to plaintiff's places of employment and corresponding time periods. In this case, plaintiffs have alleged exposure to GE land-based steam turbines and its responses are accordingly directed to those products. Further, GE objects to the extent plaintiff's discovery goes beyond the scope of the exposure that plaintiff himself has alleged. GE is a large, decentralized company whose products and businesses change constantly. Due to its size and the fact that it has facilities in numerous states and foreign countries, there is

no central repository for information of the type sought by way of the discovery. GE no longer has, or never had, many of the documents apparently required to answer this discovery. In light of the over-breadth of plaintiff's inquiries, it is essentially impossible for GE to conduct a search for the information sought and GE therefore objects. GE also objects to plaintiff's discovery to the extent it potentially calls for the disclosure of privileged and confidential information protected by the attorney client privilege, the work product doctrine, trade secrets, and other exclusions from discovery. It is impossible for GE to make any more specific privilege objections due to the over breadth of this discovery and due to other objectionable aspects of the discovery.

Subject to the foregoing objections, no. GE states that it is not now, nor ever has it been, a miner, miller, supplier, importer, distributor, marketer or seller of raw asbestos fiber.

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: GE objects to plaintiff's discovery on the grounds that it is overly broad, unreasonably burdensome, not reasonably tailored to the issues of the case, and not reasonably calculated to lead to the discovery of admissible evidence. Plaintiff's discovery should be product and defendant specific, and limited to plaintiff's places of employment and corresponding time periods. In this case, plaintiffs have alleged exposure to GE land-based steam turbines and its responses are accordingly directed to those products. Further, GE objects to the extent plaintiff's discovery goes beyond the scope of the exposure that plaintiff himself has alleged. GE is a large, decentralized company whose products and businesses change constantly.

Due to its size and the fact that it has facilities in numerous states and foreign countries, there is no central repository for information of the type sought by way of the discovery. GE no longer has, or never had, many of the documents apparently required to answer this discovery. In light of the over-breadth of plaintiff's inquiries, it is essentially impossible for GE to conduct a search for the information sought and GE therefore objects. GE also objects to plaintiff's discovery to the extent it potentially calls for the disclosure of privileged and confidential information protected by the attorney client privilege, the work product doctrine, trade secrets, and other exclusions from discovery. It is impossible for GE to make any more specific privilege objections due to the overbreadth of this discovery and due to other objectionable aspects of the discovery.

Subject to the foregoing objections, See Response to Interrogatory No. 6.

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.

ANSWER: GE objects to plaintiff's discovery on the grounds that it is overly broad, unreasonably burdensome, not reasonably tailored to the issues of the case, and not reasonably calculated to lead to the discovery of admissible evidence. Plaintiff's discovery should be product and defendant specific, and limited to plaintiff's places of employment and corresponding time periods. In this case, plaintiffs have alleged exposure to GE land-based steam turbines and its responses are accordingly directed to those products. Further, GE objects to the extent plaintiff's discovery goes beyond the scope of the exposure that plaintiff himself has alleged. GE is a large, decentralized company whose products and businesses change constantly.

Due to its size and the fact that it has facilities in numerous states and foreign countries, there is no central repository for information of the type sought by way of the discovery. GE no longer has, or never had, many of the documents apparently required to answer this discovery. In light of the over-breadth of plaintiff's inquiries, it is essentially impossible for GE to conduct a search for the information sought and GE therefore objects. GE also objects to plaintiff's discovery to the extent it potentially calls for the disclosure of privileged and confidential information protected by the attorney client privilege, the work product doctrine, trade secrets, and other exclusions from discovery. It is impossible for GE to make any more specific privilege objections due to the over breadth of this discovery and due to other objectionable aspects of the discovery.

Subject to the foregoing objections, See Response to Interrogatory No. 6.

INTERROGATORY NO. 6.:

If the answer to one or more of the last three interrogatories is in the affirmative or lists any products, state as to each named product the following:

- A. As to each product, state whether such product was mined, manufactured, marketed, and/or sold.
- B. The names of the companies mining, manufacturing, marketing, and/or selling each product mined, manufactured, marketed, and/or sold.
- C. The trade or brand name of each of those products mined, manufactured, marketed, and/or sold.
- D. The date each of the named products was placed on the market.
- E. A description of the physical (chemical) composition of each of the named products, including the type of asbestos contained in the product and the percentage of asbestos put in each product.

- F. The date each of the products was removed from the market and no longer sold or distributed and the reason or reasons therefor.
- G. The date asbestos was removed from such products, if ever, and the reasons therefor.
- H. A description of the physical appearance of each of the named products.
- I. A detailed description of the intended uses of the named products.
- J. Identify the last year that you sold each such asbestos-containing product.

ANSWER: GE objects to plaintiff's discovery on the grounds that it is overly broad, unreasonably burdensome, not reasonably tailored to the issues of the case, and not reasonably calculated to lead to the discovery of admissible evidence. Plaintiff's discovery should be product and defendant specific, and limited to plaintiff's places of employment and corresponding time periods. In this case, plaintiffs have alleged exposure to GE land-based steam turbines and its responses are accordingly directed to those products. Further, GE objects to the extent plaintiff's discovery goes beyond the scope of the exposure that plaintiff himself has alleged. GE is a large, decentralized company whose products and businesses change constantly. Due to its size and the fact that it has facilities in numerous states and foreign countries, there is no central repository for information of the type sought by way of the discovery. GE no longer has, or never had, many of the documents apparently required to answer this discovery. In light of the over-breadth of plaintiff's inquiries, it is essentially impossible for GE to conduct a search for the information sought and GE therefore objects. GE also objects to plaintiff's discovery to the extent it potentially calls for the disclosure of privileged and confidential information protected by the attorney client privilege, the work product doctrine, trade secrets, and other exclusions from discovery. It is impossible for GE to make any more specific privilege

objections due to the overbreadth of this discovery and due to other objectionable aspects of the discovery.

Subject to the foregoing objections, GE states that its Turbine Business Operations division manufactured land-based steam turbines. Land-based steam turbines are mechanical devices made of metal. They turned steam energy into mechanical energy that had many uses, including powering electric generators. Some heat-retention materials that may have been used in connection with GE's land-based steam turbines, during a period of time that may or may not be relevant to this litigation, may have contained some quantity of asbestos. These materials were manufactured and installed by others, not by GE. Typically, the utility customer determined the type of insulation to be applied to the turbines. GE's large land-based steam turbines were manufactured in Schenectady, New York. In the early 1970s, the Turbine Business Operations division began recommending to its customers that they use asbestos-free thermal insulation materials on their land-based steam turbines.

GE further states that it manufactured land-based steam turbines. GE states that when plaintiffs identify the particular turbine sites at which he worked, GE will make available to plaintiff its existing master turbine file, service records, the drawings, part lists, and specifications for such turbines from its Schenectady, New York headquarters at a mutually agreeable time.

INTERROGATORY NO. 7.:

Do any documents, including but not limited to written memoranda, specifications, recommendations, blueprints, or other written materials of any kind or character, relating to the design, preparation, or introduction into the market of the products listed in Interrogatory No. 6 still exist? If so, state:

- A. A description of each such document.
- B. The name, address, and job title of each person who currently has possession of each document, and where the documents are currently located.

ANSWER: GE objects to plaintiff's discovery on the grounds that it is overly broad, unreasonably burdensome, not reasonably tailored to the issues of the case, and not reasonably calculated to lead to the discovery of admissible evidence. Plaintiff's discovery should be product and defendant specific, and limited to plaintiff's places of employment and corresponding time periods. In this case, plaintiffs have alleged exposure to GE land-based steam turbines and its responses are accordingly directed to those products. Further, GE objects to the extent plaintiff's discovery goes beyond the scope of the exposure that plaintiff himself has alleged. GE is a large, decentralized company whose products and businesses change constantly. Due to its size and the fact that it has facilities in numerous states and foreign countries, there is no central repository for information of the type sought by way of the discovery. GE no longer has, or never had, many of the documents apparently required to answer this discovery. In light of the over-breadth of plaintiff's inquiries, it is essentially impossible for GE to conduct a search for the information sought and GE therefore objects. GE also objects to plaintiff's discovery to the extent it potentially calls for the disclosure of privileged and confidential information protected by the attorney client privilege, the work product doctrine, trade secrets, and other exclusions from discovery. It is impossible for GE to make any more specific privilege objections due to the over breadth of this discovery and due to other objectionable aspects of the discovery.

GE further states that it manufactured land-based steam turbines. GE states that when plaintiffs identify the particular turbine sites at which he worked, GE will make available to plaintiff its existing master turbine file, service records, the drawings, part lists, and specifications for such turbines from its Schenectady, New York headquarters at a mutually agreeable time.

INTERROGATORY NO. 8.:

Before distributing, selling, or placing the products listed in your responses to Interrogatory Nos. 3-6 into the streams of commerce, were any tests conducted to determine potential health hazards involved in the use of, or exposure to, the materials such as asbestos, contained in those products? If the answer is affirmative, state:

- A. The names of the products tested and the date of each test.
- B. The name, address, and job title of each person conducting the tests or involved with conducting the tests.
- C. The results of the tests.

ANSWER: GE objects to plaintiff's discovery on the grounds that it is overly broad, unreasonably burdensome, not reasonably tailored to the issues of the case, and not reasonably calculated to lead to the discovery of admissible evidence. Plaintiff's discovery should be product and defendant specific, and limited to plaintiff's places of employment and corresponding time periods. In this case, plaintiffs have alleged exposure to GE land-based steam turbines and its responses are accordingly directed to those products. Further, GE objects to the extent plaintiff's discovery goes beyond the scope of the exposure that plaintiff himself has alleged. GE is a large, decentralized company whose products and businesses change constantly. Due to its size and the fact that it has facilities in numerous states and foreign countries, there is no central repository for information of the type sought by way of the discovery. GE no longer

has, or never had, many of the documents apparently required to answer this discovery. In light of the over-breadth of plaintiff's inquiries, it is essentially impossible for GE to conduct a search for the information sought and GE therefore objects. GE also objects to plaintiff's discovery to the extent it potentially calls for the disclosure of privileged and confidential information protected by the attorney client privilege, the work product doctrine, trade secrets, and other exclusions from discovery. It is impossible for GE to make any more specific privilege objections due to the over breadth of this discovery and due to other objectionable aspects of the discovery.

Subject to the foregoing objections, land-based steam turbines are not asbestos-containing products, and any insulation placed on them was manufactured and installed by others. See Response to Interrogatory No. 6.

INTERROGATORY NO. 9.:

Do any documents, including but not limited to written memoranda, specifications, recommendations, blueprints, or other written materials of any kind or character, relating to the testing of the products referred to in Interrogatory No. 6 now exist? If so, state:

- A. A description of each such document.
- B. The name, address, and job title of each person who currently has possession of each document, and where it is presently located.

ANSWER: GE objects to plaintiff's discovery on the grounds that it is overly broad, unreasonably burdensome, not reasonably tailored to the issues of the case, and not reasonably calculated to lead to the discovery of admissible evidence. Plaintiff's discovery should be product and defendant specific, and limited to plaintiff's places of employment and corresponding time periods. In this case, plaintiffs have alleged exposure to GE land-based

steam turbines and its responses are accordingly directed to those products. Further, GE objects to the extent plaintiff's discovery goes beyond the scope of the exposure that plaintiff himself has alleged. GE is a large, decentralized company whose products and businesses change constantly. Due to its size and the fact that it has facilities in numerous states and foreign countries, there is no central repository for information of the type sought by way of the discovery. GE no longer has, or never had, many of the documents apparently required to answer this discovery. In light of the over-breadth of plaintiff's inquiries, it is essentially impossible for GE to conduct a search for the information sought and GE therefore objects. GE also objects to plaintiff's discovery to the extent it potentially calls for the disclosure of privileged and confidential information protected by the attorney client privilege, the work product doctrine, trade secrets, and other exclusions from discovery. It is impossible for GE to make any more specific privilege objections due to the over breadth of this discovery and due to other objectionable aspects of the discovery.

Subject to the foregoing objections, not applicable. See Response to Interrogatory No. 8.

INTERROGATORY NO. 10.:

Did Defendant or any of its predecessor or subsidiary companies make any design changes or modifications as a result of those tests described in responses to Interrogatory No. 8? If the answer is affirmative, state:

- A. The trade names of the products changed.
- B. The nature of the changes made and the date of such changes or modifications.
- C. The name, address, and job title of each person responsible for having caused a change to be made, or having made a change or modification.

ANSWER: GE objects to plaintiff's discovery on the grounds that it is overly broad, unreasonably burdensome, not reasonably tailored to the issues of the case, and not reasonably calculated to lead to the discovery of admissible evidence. Plaintiff's discovery should be product and defendant specific, and limited to plaintiff's places of employment and corresponding time periods. In this case, plaintiffs have alleged exposure to GE land-based steam turbines and its responses are accordingly directed to those products. Further, GE objects to the extent plaintiff's discovery goes beyond the scope of the exposure that plaintiff himself has alleged. GE is a large, decentralized company whose products and businesses change constantly. Due to its size and the fact that it has facilities in numerous states and foreign countries, there is no central repository for information of the type sought by way of the discovery. GE no longer has, or never had, many of the documents apparently required to answer this discovery. In light of the over-breadth of plaintiff's inquiries, it is essentially impossible for GE to conduct a search for the information sought and GE therefore objects. GE also objects to plaintiff's discovery to the extent it potentially calls for the disclosure of privileged and confidential information protected by the attorney client privilege, the work product doctrine, trade secrets, and other exclusions from discovery. It is impossible for GE to make any more specific privilege objections due to the over breadth of this discovery and due to other objectionable aspects of the discovery.

Subject to the foregoing objections, not applicable. See Response to Interrogatory No. 8.

INTERROGATORY NO. 11.:

After releasing the products listed in Interrogatory No. 6 to the public, were any tests conducted on them to determine potential health hazards resulting from the use of or exposure to the materials, such as asbestos, contained in those products? If the answer is affirmative, state:

- A. The names of the products tested and the dates of such tests.
- B. The name, address, and job title of each person who conducted those tests.
- C. The results of those tests.
- D. Whether, as a result of the tests, any products were removed from the market.
- E. The names of all products removed from the market as a result of these tests.

ANSWER: GE objects to plaintiff's discovery on the grounds that it is overly broad, unreasonably burdensome, not reasonably tailored to the issues of the case, and not reasonably calculated to lead to the discovery of admissible evidence. Plaintiff's discovery should be product and defendant specific, and limited to plaintiff's places of employment and corresponding time periods. In this case, plaintiffs have alleged exposure to GE land-based steam turbines and its responses are accordingly directed to those products. Further, GE objects to the extent plaintiff's discovery goes beyond the scope of the exposure that plaintiff himself has alleged. GE is a large, decentralized company whose products and businesses change constantly. Due to its size and the fact that it has facilities in numerous states and foreign countries, there is no central repository for information of the type sought by way of the discovery. GE no longer has, or never had, many of the documents apparently required to answer this discovery. In light of the over-breadth of plaintiff's inquiries, it is essentially impossible for GE to conduct a search for the information sought and GE therefore objects. GE also objects to plaintiff's discovery to the extent it potentially calls for the disclosure of privileged and confidential information protected by the attorney client privilege, the work product doctrine, trade secrets, and other exclusions from discovery. It is impossible for GE to make any more specific privilege

objections due to the over breadth of this discovery and due to other objectionable aspects of the discovery.

Subject to the foregoing objections, not applicable. See Response to Interrogatory No. 8.

INTERROGATORY NO. 12.:

Do any documents, including written memoranda, specifications, recommendations, blueprints, or other written materials of any kind or character, relating to the potential health hazards of the products listed in Interrogatory No. 6 now exist? If so, state:

- A. The name of each product.
- B. A description of each document and how it relates to each product.
- C. The name, address, and job title of each person who currently has possession of each document, and where it is presently located.

ANSWER: GE objects to plaintiff's discovery on the grounds that it is overly broad, unreasonably burdensome, not reasonably tailored to the issues of the case, and not reasonably calculated to lead to the discovery of admissible evidence. Plaintiff's discovery should be product and defendant specific, and limited to plaintiff's places of employment and corresponding time periods. In this case, plaintiffs have alleged exposure to GE land-based steam turbines and its responses are accordingly directed to those products. Further, GE objects to the extent plaintiff's discovery goes beyond the scope of the exposure that plaintiff himself has alleged. GE is a large, decentralized company whose products and businesses change constantly. Due to its size and the fact that it has facilities in numerous states and foreign countries, there is no central repository for information of the type sought by way of the discovery. GE no longer has, or never had, many of the documents apparently required to answer this discovery. In light of the over-breadth of plaintiff's inquiries, it is essentially impossible for GE to conduct a search

for the information sought and GE therefore objects. GE also objects to plaintiff's discovery to the extent it potentially calls for the disclosure of privileged and confidential information protected by the attorney client privilege, the work product doctrine, trade secrets, and other exclusions from discovery. It is impossible for GE to make any more specific privilege objections due to the over breadth of this discovery and due to other objectionable aspects of the discovery.

Subject to the foregoing objections, not applicable. See Response to Interrogatory No. 8.

INTERROGATORY NO. 13.:

Did Defendant or any of its subsidiary companies make any design changes as a result of the tests discussed in your response to Interrogatories Nos. 8 or 11? If the answer is affirmative, state:

- A. The names of the products changed or modified.
- B. The name, address, and job title of each person responsible for having made a change or modification.
- C. The nature of the hazard or defect which resulted in such change or modification.

ANSWER: GE objects to plaintiff's discovery on the grounds that it is overly broad, unreasonably burdensome, not reasonably tailored to the issues of the case, and not reasonably calculated to lead to the discovery of admissible evidence. Plaintiff's discovery should be product and defendant specific, and limited to plaintiff's places of employment and corresponding time periods. In this case, plaintiffs have alleged exposure to GE land-based steam turbines and its responses are accordingly directed to those products. Further, GE objects to the extent plaintiff's discovery goes beyond the scope of the exposure that plaintiff himself has alleged. GE is a large, decentralized company whose products and businesses change constantly.

Due to its size and the fact that it has facilities in numerous states and foreign countries, there is no central repository for information of the type sought by way of the discovery. GE no longer has, or never had, many of the documents apparently required to answer this discovery. In light of the over-breadth of plaintiff's inquiries, it is essentially impossible for GE to conduct a search for the information sought and GE therefore objects. GE also objects to plaintiff's discovery to the extent it potentially calls for the disclosure of privileged and confidential information protected by the attorney client privilege, the work product doctrine, trade secrets, and other exclusions from discovery. It is impossible for GE to make any more specific privilege objections due to the over breadth of this discovery and due to other objectionable aspects of the discovery.

Subject to the foregoing objections, not applicable. See Response to Interrogatory No. 8.

INTERROGATORY NO. 14.:

Has Defendant or any of its predecessor or subsidiary companies at any time published or distributed any printed material, including brochures, pamphlets, catalogs, packaging or other written material or any kind or character containing any warnings concerning the possibility of injury resulting from the use of the asbestos-containing products listed in Interrogatory No. 6? If so, state:

- A. The names of each relevant product.
- B. The exact wording of each warning statement on each printed material.
- C. A description of the printed material other than the warning statement.
- D. The method used to distribute the warning to persons likely to use the product.
- E. The date each warning was first issued, distributed, or placed on packaging.
- F. The name, address, and job title of each person responsible for having drafted or issued the warning.

- G. The current location of any such printed material and the custodian thereof.
- H. The form in which such literature or printed material can be accessed, i.e., the manner in which such literature is indexed or stored.

ANSWER: GE objects to plaintiff's discovery on the grounds that it is overly broad, unreasonably burdensome, not reasonably tailored to the issues of the case, and not reasonably calculated to lead to the discovery of admissible evidence. Plaintiff's discovery should be product and defendant specific, and limited to plaintiff's places of employment and corresponding time periods. In this case, plaintiffs have alleged exposure to GE land-based steam turbines and its responses are accordingly directed to those products. Further, GE objects to the extent plaintiff's discovery goes beyond the scope of the exposure that plaintiff himself has alleged. GE is a large, decentralized company whose products and businesses change constantly. Due to its size and the fact that it has facilities in numerous states and foreign countries, there is no central repository for information of the type sought by way of the discovery. GE no longer has, or never had, many of the documents apparently required to answer this discovery. In light of the over-breadth of plaintiff's inquiries, it is essentially impossible for GE to conduct a search for the information sought and GE therefore objects. GE also objects to plaintiff's discovery to the extent it potentially calls for the disclosure of privileged and confidential information protected by the attorney client privilege, the work product doctrine, trade secrets, and other exclusions from discovery. It is impossible for GE to make any more specific privilege objections due to the over breadth of this discovery and due to other objectionable aspects of the discovery.

Subject to the foregoing objections, land-based steam turbines are not asbestos-containing products. Any insulation placed on them was manufactured and installed by others ultimately based upon a determination by the utility. At some point in time, the manufacturers and installers may have provided warnings on their insulation products but GE would not have been involved in the preparation of such warnings. See Response to Interrogatory No. 6.

INTERROGATORY NO. 15.:

Before 1970, had you received notice that any individual or individuals, other than those Plaintiffs who have filed personal injury actions in Texas State Courts is or are claiming or has or have claimed an injury as a result of using asbestos products manufactured and/or sold by your company or any of its predecessors or subsidiaries before 1970? If so, state:

- A. The name and address of each claimant.
- B. The date of notice of each claim.
- C. A description of the claim.
- D. The type of injuries allegedly sustained.
- E. The name and address of each attorney who represents each individual making a claim.
- F. The style and court number of each claim.
- G. The disposition of each claim that has been settled or taken to judgment.

ANSWER: GE objects to plaintiff's discovery on the grounds that it is overly broad, unreasonably burdensome, not reasonably tailored to the issues of the case, and not reasonably calculated to lead to the discovery of admissible evidence. Plaintiff's discovery should be product and defendant specific, and limited to plaintiff's places of employment and corresponding time periods. In this case, plaintiffs have alleged exposure to GE land-based steam turbines and its responses are accordingly directed to those products. Further, GE objects

to the extent plaintiff's discovery goes beyond the scope of the exposure that plaintiff himself has alleged. GE is a large, decentralized company whose products and businesses change constantly. Due to its size and the fact that it has facilities in numerous states and foreign countries, there is no central repository for information of the type sought by way of the discovery. GE no longer has, or never had, many of the documents apparently required to answer this discovery. In light of the over-breadth of plaintiff's inquiries, it is essentially impossible for GE to conduct a search for the information sought and GE therefore objects. GE also objects to plaintiff's discovery to the extent it potentially calls for the disclosure of privileged and confidential information protected by the attorney client privilege, the work product doctrine, trade secrets, and other exclusions from discovery. It is impossible for GE to make any more specific privilege objections due to the over breadth of this discovery and due to other objectionable aspects of the discovery.

Subject to the foregoing objections, to the best of GE's knowledge, no.

INTERROGATORY NO. 16.:

Were your asbestos products distributed, marketed, packaged, labeled and/or sold by companies other than your own? If the answer is affirmative, list the names and addresses of each of those companies, and the products in question.

ANSWER: GE objects to plaintiff's discovery on the grounds that it is overly broad, unreasonably burdensome, not reasonably tailored to the issues of the case, and not reasonably calculated to lead to the discovery of admissible evidence. Plaintiff's discovery should be product and defendant specific, and limited to plaintiff's places of employment and corresponding time periods. In this case, plaintiffs have alleged exposure to GE land-based steam turbines and its responses are accordingly directed to those products. Further, GE objects

to the extent plaintiff's discovery goes beyond the scope of the exposure that plaintiff himself has alleged. GE is a large, decentralized company whose products and businesses change constantly. Due to its size and the fact that it has facilities in numerous states and foreign countries, there is no central repository for information of the type sought by way of the discovery. GE no longer has, or never had, many of the documents apparently required to answer this discovery. In light of the over-breadth of plaintiff's inquiries, it is essentially impossible for GE to conduct a search for the information sought and GE therefore objects. GE also objects to plaintiff's discovery to the extent it potentially calls for the disclosure of privileged and confidential information protected by the attorney client privilege, the work product doctrine, trade secrets, and other exclusions from discovery. It is impossible for GE to make any more specific privilege objections due to the over breadth of this discovery and due to other objectionable aspects of the discovery.

Subject to the foregoing objections, GE's land-based steam turbines were sold through its own sales force.

INTERROGATORY NO. 17.:

Did you or any of your predecessors, successors, or subsidiaries have any distributors or sales representatives of asbestos products in the States of Alabama, Florida, Mississippi, Oregon, Washington, Georgia, Tennessee, Arkansas, Texas and Virginia? If so, state:

- A. The name and address of each such distributor or sales representatives.
- B. The years in which such company or person distributed, marketed, or sold your products.
- C. What products were distributed, marketed, or sold and in what years.

ANSWER: GE objects to plaintiff's discovery on the grounds that it is overly broad, unreasonably burdensome, not reasonably tailored to the issues of the case, and not reasonably calculated to lead to the discovery of admissible evidence. Plaintiff's discovery should be product and defendant specific, and limited to plaintiff's places of employment and corresponding time periods. In this case, plaintiffs have alleged exposure to GE land-based steam turbines and its responses are accordingly directed to those products. Further, GE objects to the extent plaintiff's discovery goes beyond the scope of the exposure that plaintiff himself has alleged. GE is a large, decentralized company whose products and businesses change constantly. Due to its size and the fact that it has facilities in numerous states and foreign countries, there is no central repository for information of the type sought by way of the discovery. GE no longer has, or never had, many of the documents apparently required to answer this discovery. In light of the over-breadth of plaintiff's inquiries, it is essentially impossible for GE to conduct a search for the information sought and GE therefore objects. GE also objects to plaintiff's discovery to the extent it potentially calls for the disclosure of privileged and confidential information protected by the attorney client privilege, the work product doctrine, trade secrets, and other exclusions from discovery. It is impossible for GE to make any more specific privilege objections due to the over breadth of this discovery and due to other objectionable aspects of the discovery.

GE further states that it manufactured land-based steam turbines. GE states that when plaintiffs identify the particular turbine sites at which he worked, GE will make available to plaintiff its existing master turbine file, service records, the drawings, part lists, and

specifications for such turbines from its Schenectady, New York headquarters at a mutually agreeable time.

INTERROGATORY NO. 18.:

List each employee (including only physicians and/or hygienists) who acted in a medical advisory capacity to your company at any time during the past 40 years, including, but not limited to, physicians and industrial hygienists, and the current address, telephone number and job title of each of those individuals and who has, had or may have had any knowledge regarding the hazards of asbestos.

ANSWER: GE objects to plaintiff's discovery on the grounds that it is overly broad, unreasonably burdensome, not reasonably tailored to the issues of the case, and not reasonably calculated to lead to the discovery of admissible evidence. Plaintiff's discovery should be product and defendant specific, and limited to plaintiff's places of employment and corresponding time periods. In this case, plaintiffs have alleged exposure to GE land-based steam turbines and its responses are accordingly directed to those products. Further, GE objects to the extent plaintiff's discovery goes beyond the scope of the exposure that plaintiff himself has alleged. GE is a large, decentralized company whose products and businesses change constantly. Due to its size and the fact that it has facilities in numerous states and foreign countries, there is no central repository for information of the type sought by way of the discovery. GE no longer has, or never had, many of the documents apparently required to answer this discovery. In light of the over-breadth of plaintiff's inquiries, it is essentially impossible for GE to conduct a search for the information sought and GE therefore objects. GE also objects to plaintiff's discovery to the extent it potentially calls for the disclosure of privileged and confidential information protected by the attorney client privilege, the work product doctrine, trade secrets, and other exclusions from discovery. It is impossible for GE to make any more specific privilege

objections due to the over breadth of this discovery and due to other objectionable aspects of the discovery.

Subject to the foregoing objections, GE states that it has employed many industrial hygienists and physicians who have had responsibility for employee health and safety. Given the breadth of the time period covered, the wide variety of products manufactured, the size of the company, and the number of facilities owned or managed, it would be impossible to answer this interrogatory, as such is overly broad and unduly burdensome. Moreover, as GE was not in the asbestos business and as land turbines are not asbestos products, such individuals would not have had responsibility for any asbestos insulation manufactured and installed by others. See Responses to Interrogatory Nos. 6, 14 and 48.

INTERROGATORY NO. 19.:

Does Defendant have in its possession any books, pamphlets, memoranda, or written materials of any kind or character that would indicate asbestos fibers, when inhaled, can be hazardous to the health of human beings? If so, state:

- A. The name of each such publication.
- B. The date of publication and the names of the author and publisher (if any).
- C. The date received by Defendant, if known.
- D. The name, job title, and address of each person who currently has possession of each publication and its present location.

ANSWER: GE objects to plaintiff's discovery on the grounds that it is overly broad, unreasonably burdensome, not reasonably tailored to the issues of the case, and not reasonably calculated to lead to the discovery of admissible evidence. Plaintiff's discovery should be product and defendant specific, and limited to plaintiff's places of employment and

corresponding time periods. In this case, plaintiffs have alleged exposure to GE land-based steam turbines and its responses are accordingly directed to those products. Further, GE objects to the extent plaintiff's discovery goes beyond the scope of the exposure that plaintiff himself has alleged. GE is a large, decentralized company whose products and businesses change constantly. Due to its size and the fact that it has facilities in numerous states and foreign countries, there is no central repository for information of the type sought by way of the discovery. GE no longer has, or never had, many of the documents apparently required to answer this discovery. In light of the over-breadth of plaintiff's inquiries, it is essentially impossible for GE to conduct a search for the information sought and GE therefore objects. GE also objects to plaintiff's discovery to the extent it potentially calls for the disclosure of privileged and confidential information protected by the attorney client privilege, the work product doctrine, trade secrets, and other exclusions from discovery. It is impossible for GE to make any more specific privilege objections due to the over breadth of this discovery and due to other objectionable aspects of the discovery.

Subject to the foregoing objections, GE states that it is not currently nor has it ever been aware of any clinical, epidemiological, toxicological, industrial hygiene, medical and/or scientific literature demonstrating that GE land-based steam turbines cause adverse health consequences. GE notes that the amount of materials published in both the technical and popular press that discuss possible correlations between asbestos, especially friable, amphibole asbestos, and human health consequences is voluminous. Thus, GE is unable to definitively answer on what specific date it first became aware of a possible correlation between asbestos and human health consequences. GE further states, however, that at all times its respective businesses kept

apprised of the prevailing industry standards and standards of medical art as they related to the operation of GE's respective businesses.

INTERROGATORY NO. 20.:

Has Defendant or any of its subsidiary or predecessor companies at any time been a member of any trade organization or association that published or disseminated any documents or information relating to the hazards of asbestos comprised of other manufacturers, miners, marketers, and/or sellers of asbestos products? If so, state:

- A. The name and address of each such association or organization.
- B. The dates during which Defendant or any of its subsidiaries or predecessors were members.
- C. The names and dates of any publications, minutes, or reports published, written, or disseminated by any of the named associations or organizations.
- D. Whether any of those publications are still in your possession, and if so:
 - 1. A description of the publications, including the date.
 - 2. The current location of such publications.
 - 3. The custodian of such publications.
 - 4. The method or manner in which such publications are maintained.

ANSWER: GE objects to plaintiff's discovery on the grounds that it is overly broad, unreasonably burdensome, not reasonably tailored to the issues of the case, and not reasonably calculated to lead to the discovery of admissible evidence. Plaintiff's discovery should be product and defendant specific, and limited to plaintiff's places of employment and corresponding time periods. In this case, plaintiffs have alleged exposure to GE land-based steam turbines and its responses are accordingly directed to those products. Further, GE objects

to the extent plaintiff's discovery goes beyond the scope of the exposure that plaintiff himself has alleged. GE is a large, decentralized company whose products and businesses change constantly. Due to its size and the fact that it has facilities in numerous states and foreign countries, there is no central repository for information of the type sought by way of the discovery. GE no longer has, or never had, many of the documents apparently required to answer this discovery. In light of the over-breadth of plaintiff's inquiries, it is essentially impossible for GE to conduct a search for the information sought and GE therefore objects. GE also objects to plaintiff's discovery to the extent it potentially calls for the disclosure of privileged and confidential information protected by the attorney client privilege, the work product doctrine, trade secrets, and other exclusions from discovery. It is impossible for GE to make any more specific privilege objections due to the over breadth of this discovery and due to other objectionable aspects of the discovery.

Subject to the foregoing objections, GE states that it has never been a member of the "asbestos industry" as that phrase is commonly used and is not a member of asbestos industry organizations. GE states, however, upon information and belief, that it became a member of the Industrial Hygiene Foundation in 1947.

INTERROGATORY NO. 21.:

Identify by name and location each plant or manufacturing facility in which the products listed in your answers to Interrogatory Nos. 3-6 were manufactured, assembled, or prepared for sale or marketing, specifying which plants produced each item, the dates each plant is or was in operation, and the time span during which each named item was produced or manufactured.

ANSWER: GE objects to plaintiff's discovery on the grounds that it is overly broad, unreasonably burdensome, not reasonably tailored to the issues of the case, and not reasonably

calculated to lead to the discovery of admissible evidence. Plaintiff's discovery should be product and defendant specific, and limited to plaintiff's places of employment and corresponding time periods. In this case, plaintiffs have alleged exposure to GE land-based steam turbines and its responses are accordingly directed to those products. Further, GE objects to the extent plaintiff's discovery goes beyond the scope of the exposure that plaintiff himself has alleged. GE is a large, decentralized company whose products and businesses change constantly. Due to its size and the fact that it has facilities in numerous states and foreign countries, there is no central repository for information of the type sought by way of the discovery. GE no longer has, or never had, many of the documents apparently required to answer this discovery. In light of the over-breadth of plaintiff's inquiries, it is essentially impossible for GE to conduct a search for the information sought and GE therefore objects. GE also objects to plaintiff's discovery to the extent it potentially calls for the disclosure of privileged and confidential information protected by the attorney client privilege, the work product doctrine, trade secrets, and other exclusions from discovery. It is impossible for GE to make any more specific privilege objections due to the over breadth of this discovery and due to other objectionable aspects of the discovery.

Subject to the foregoing objections, See Response to Interrogatory No. 6.

INTERROGATORY NO. 22.:

Have printed sales materials been prepared by Defendant or any of its subsidiary or predecessor companies or their agents for purposes of marketing or advertising products containing asbestos? If so, state:

- A. The name, address, and job title of each person or entity who prepared such materials.

- B. The name, address, and job title of each person who currently has possession of such materials and their present location.
- C. The date the materials were prepared.
- D. The media used to disseminate the sales materials.

ANSWER: GE objects to plaintiff's discovery on the grounds that it is overly broad, unreasonably burdensome, not reasonably tailored to the issues of the case, and not reasonably calculated to lead to the discovery of admissible evidence. Plaintiff's discovery should be product and defendant specific, and limited to plaintiff's places of employment and corresponding time periods. In this case, plaintiffs have alleged exposure to GE land-based steam turbines and its responses are accordingly directed to those products. Further, GE objects to the extent plaintiff's discovery goes beyond the scope of the exposure that plaintiff himself has alleged. GE is a large, decentralized company whose products and businesses change constantly. Due to its size and the fact that it has facilities in numerous states and foreign countries, there is no central repository for information of the type sought by way of the discovery. GE no longer has, or never had, many of the documents apparently required to answer this discovery. In light of the over-breadth of plaintiff's inquiries, it is essentially impossible for GE to conduct a search for the information sought and GE therefore objects. GE also objects to plaintiff's discovery to the extent it potentially calls for the disclosure of privileged and confidential information protected by the attorney client privilege, the work product doctrine, trade secrets, and other exclusions from discovery. It is impossible for GE to make any more specific privilege objections due to the over breadth of this discovery and due to other objectionable aspects of the discovery.

Subject to the foregoing objections, land-based steam turbines are not asbestos-containing products. *See* response to Interrogatory No. 6.

INTERROGATORY NO. 23.:

Have any written or printed materials or instructions of any kind or character been prepared by Defendant or any of its subsidiary or predecessor companies or their agents indicating how asbestos products should be used and maintained? If so, state:

- A. The name, address, and job title of each person who prepared such materials or instructions or assisted in their preparation.
- B. The name, address, and job title of each person who currently has possession of such materials or instructions and their present location.
- C. The dates of distribution or use and the manner in which such materials or instructions were distributed to purchasers of Defendant's products or those of its subsidiaries or predecessors.
- D. The year each such written material or instruction was prepared and disclosed to potential consumers.

ANSWER: GE objects to plaintiff's discovery on the grounds that it is overly broad, unreasonably burdensome, not reasonably tailored to the issues of the case, and not reasonably calculated to lead to the discovery of admissible evidence. Plaintiff's discovery should be product and defendant specific, and limited to plaintiff's places of employment and corresponding time periods. In this case, plaintiffs have alleged exposure to GE land-based steam turbines and its responses are accordingly directed to those products. Further, GE objects to the extent plaintiff's discovery goes beyond the scope of the exposure that plaintiff himself has alleged. GE is a large, decentralized company whose products and businesses change constantly. Due to its size and the fact that it has facilities in numerous states and foreign countries, there is no central repository for information of the type sought by way of the discovery. GE no longer

has, or never had, many of the documents apparently required to answer this discovery. In light of the over-breadth of plaintiff's inquiries, it is essentially impossible for GE to conduct a search for the information sought and GE therefore objects. GE also objects to plaintiff's discovery to the extent it potentially calls for the disclosure of privileged and confidential information protected by the attorney client privilege, the work product doctrine, trade secrets, and other exclusions from discovery. It is impossible for GE to make any more specific privilege objections due to the over breadth of this discovery and due to other objectionable aspects of the discovery.

Subject to the foregoing objections, not applicable. Land-based steam turbines are not asbestos-containing products, and any insulation placed on them was manufactured and installed by others. See Response to Interrogatory No. 6.

INTERROGATORY NO. 24.:

Does Defendant have insurance policies that might cover the claims made by Plaintiffs in these cases? If so, list the name of each insurance carrier, the amount of initial coverage, amount of coverage remaining at the present time, and the effective dates of each policy. (If properly answered, this Interrogatory need not be supplemented as to the remaining amount of coverage).

ANSWER: GE objects to plaintiff's discovery on the grounds that it is overly broad, unreasonably burdensome, not reasonably tailored to the issues of the case, and not reasonably calculated to lead to the discovery of admissible evidence. Plaintiff's discovery should be product and defendant specific, and limited to plaintiff's places of employment and corresponding time periods. In this case, plaintiffs have alleged exposure to GE land-based steam turbines and its responses are accordingly directed to those products. Further, GE objects to the extent plaintiff's discovery goes beyond the scope of the exposure that plaintiff himself has

alleged. GE is a large, decentralized company whose products and businesses change constantly. Due to its size and the fact that it has facilities in numerous states and foreign countries, there is no central repository for information of the type sought by way of the discovery. GE no longer has, or never had, many of the documents apparently required to answer this discovery. In light of the over-breadth of plaintiff's inquiries, it is essentially impossible for GE to conduct a search for the information sought and GE therefore objects. GE also objects to plaintiff's discovery to the extent it potentially calls for the disclosure of privileged and confidential information protected by the attorney client privilege, the work product doctrine, trade secrets, and other exclusions from discovery. It is impossible for GE to make any more specific privilege objections due to the over breadth of this discovery and due to other objectionable aspects of the discovery.

Subject to the foregoing objections, yes. Without waiving any specific or general objections, GE states that it is insured under multiple liability policies which provide coverage in excess of the total ad damnum claimed in these actions.

INTERROGATORY NO. 25.:

As to the disease asbestosis, state:

- A. The date on which Defendant or its subsidiary or predecessor first learned that such disease was caused by inhalation of asbestos fibers by humans.
- B. How Defendant became aware of the existence of the disease.
- C. Who within the company first discovered, recognized or understood the adverse consequences or effects of the disease and/or of asbestos exposure.
- D. What information was disseminated within Defendant's company or its subsidiary or predecessor regarding such adverse consequences or effects.

- E. Whether any such information is still maintained by Defendant or its subsidiary or predecessor in any written form.
- F. Who is the custodian of such information.
- G. The date on which you first received knowledge or information that asbestosis was caused by inhalation of asbestos fibers.

ANSWER: GE objects to plaintiff's discovery on the grounds that it is overly broad, unreasonably burdensome, not reasonably tailored to the issues of the case, and not reasonably calculated to lead to the discovery of admissible evidence. Plaintiff's discovery should be product and defendant specific, and limited to plaintiff's places of employment and corresponding time periods. In this case, plaintiffs have alleged exposure to GE land-based steam turbines and its responses are accordingly directed to those products. Further, GE objects to the extent plaintiff's discovery goes beyond the scope of the exposure that plaintiff himself has alleged. GE is a large, decentralized company whose products and businesses change constantly. Due to its size and the fact that it has facilities in numerous states and foreign countries, there is no central repository for information of the type sought by way of the discovery. GE no longer has, or never had, many of the documents apparently required to answer this discovery. In light of the over-breadth of plaintiff's inquiries, it is essentially impossible for GE to conduct a search for the information sought and GE therefore objects. GE also objects to plaintiff's discovery to the extent it potentially calls for the disclosure of privileged and confidential information protected by the attorney client privilege, the work product doctrine, trade secrets, and other exclusions from discovery. It is impossible for GE to make any more specific privilege objections due to the over breadth of this discovery and due to other objectionable aspects of the discovery.

Subject to the foregoing objections, See Response to Interrogatory No. 19.

INTERROGATORY NO. 26.:

As to the disease lung cancer, state:

- A. The date on which Defendant or its subsidiary or predecessor first learned that such disease was caused by inhalation of asbestos fibers by humans.
- B. How Defendant or its subsidiary or predecessor became aware of the disease and its relationship to asbestos exposure.
- C. Who within the company or its subsidiary or predecessor first discovered or recognized the adverse consequences or effects of asbestos exposure.
- D. What information was disseminated within Defendant's company or its subsidiary or predecessor regarding such adverse consequences or effects.
- E. Whether any such information is still maintained by Defendants or its subsidiaries or predecessors in a written form.
- F. Who is the custodian of such information.
- G. The date on which you first received knowledge or information that lung cancer was caused by inhalation of asbestos dust and fibers.

ANSWER: GE objects to plaintiff's discovery on the grounds that it is overly broad, unreasonably burdensome, not reasonably tailored to the issues of the case, and not reasonably calculated to lead to the discovery of admissible evidence. Plaintiff's discovery should be product and defendant specific, and limited to plaintiff's places of employment and corresponding time periods. In this case, plaintiffs have alleged exposure to GE land-based steam turbines and its responses are accordingly directed to those products. Further, GE objects to the extent plaintiff's discovery goes beyond the scope of the exposure that plaintiff himself has alleged. GE is a large, decentralized company whose products and businesses change constantly. Due to its size and the fact that it has facilities in numerous states and foreign countries, there is

no central repository for information of the type sought by way of the discovery. GE no longer has, or never had, many of the documents apparently required to answer this discovery. In light of the over-breadth of plaintiff's inquiries, it is essentially impossible for GE to conduct a search for the information sought and GE therefore objects. GE also objects to plaintiff's discovery to the extent it potentially calls for the disclosure of privileged and confidential information protected by the attorney client privilege, the work product doctrine, trade secrets, and other exclusions from discovery. It is impossible for GE to make any more specific privilege objections due to the over breadth of this discovery and due to other objectionable aspects of the discovery.

Subject to the foregoing objections, See Response to Interrogatory No. 19.

INTERROGATORY NO. 27.:

As to pleural disease, pleural thickening or pleural plaques, state:

- A. The date on which Defendant or its subsidiary or predecessor learned such disease was caused by inhalation of asbestos fibers by humans.
- B. How Defendant or its subsidiary or predecessor became aware of the disease and that it was caused by exposure to asbestos.
- C. Who within the company or its subsidiary or predecessor first discovered or recognized the adverse consequences or effects of asbestos exposure.
- D. What information was disseminated within Defendant's company or its subsidiary or predecessor regarding such adverse consequences or effects.
- E. Whether any such information is still maintained by Defendants or its subsidiaries or predecessors in a written form.
- F. Who is the custodian of such information.

ANSWER: GE objects to plaintiff's discovery on the grounds that it is overly broad, unreasonably burdensome, not reasonably tailored to the issues of the case, and not reasonably calculated to lead to the discovery of admissible evidence. Plaintiff's discovery should be product and defendant specific, and limited to plaintiff's places of employment and corresponding time periods. In this case, plaintiffs have alleged exposure to GE land-based steam turbines and its responses are accordingly directed to those products. Further, GE objects to the extent plaintiff's discovery goes beyond the scope of the exposure that plaintiff himself has alleged. GE is a large, decentralized company whose products and businesses change constantly. Due to its size and the fact that it has facilities in numerous states and foreign countries, there is no central repository for information of the type sought by way of the discovery. GE no longer has, or never had, many of the documents apparently required to answer this discovery. In light of the over-breadth of plaintiff's inquiries, it is essentially impossible for GE to conduct a search for the information sought and GE therefore objects. GE also objects to plaintiff's discovery to the extent it potentially calls for the disclosure of privileged and confidential information protected by the attorney client privilege, the work product doctrine, trade secrets, and other exclusions from discovery. It is impossible for GE to make any more specific privilege objections due to the over breadth of this discovery and due to other objectionable aspects of the discovery.

Subject to the foregoing objections, See Response to Interrogatory No. 19.

INTERROGATORY NO. 28.:

As to the disease mesothelioma, state:

- A. The date on which Defendant or its subsidiary or predecessor first learned such disease was caused by inhalation of asbestos fibers by humans.
- B. The date on which Defendant first suspected that mesothelioma was caused by the inhalation of asbestos dust and fibers.
- C. How Defendant or its subsidiary or predecessor became aware of the disease and that it was caused by exposure to asbestos.
- D. Who within the company or its subsidiary or predecessor first discovered or recognized the adverse consequences or effects of asbestos exposure.
- E. What information was disseminated within Defendant's company or its subsidiary or predecessor regarding such adverse consequences or effects.
- F. Whether any such information is still maintained by Defendants or its subsidiary or predecessor in a written form.
- G. Who is the custodian of such information.
- H. Whether Defendant agrees that there is no known medical cure for mesothelioma.

ANSWER: GE objects to plaintiff's discovery on the grounds that it is overly broad, unreasonably burdensome, not reasonably tailored to the issues of the case, and not reasonably calculated to lead to the discovery of admissible evidence. Plaintiff's discovery should be product and defendant specific, and limited to plaintiff's places of employment and corresponding time periods. In this case, plaintiffs have alleged exposure to GE land-based steam turbines and its responses are accordingly directed to those products. Further, GE objects to the extent plaintiff's discovery goes beyond the scope of the exposure that plaintiff himself has alleged. GE is a large, decentralized company whose products and businesses change constantly. Due to its size and the fact that it has facilities in numerous states and foreign countries, there is no central repository for information of the type sought by way of the discovery. GE no longer has, or never had, many of the documents apparently required to answer this discovery. In light

of the over-breadth of plaintiff's inquiries, it is essentially impossible for GE to conduct a search for the information sought and GE therefore objects. GE also objects to plaintiff's discovery to the extent it potentially calls for the disclosure of privileged and confidential information protected by the attorney client privilege, the work product doctrine, trade secrets, and other exclusions from discovery. It is impossible for GE to make any more specific privilege objections due to the over breadth of this discovery and due to other objectionable aspects of the discovery.

Subject to the foregoing objections, See Response to Interrogatory No. 19.

INTERROGATORY NO. 29.:

As to gastro-intestinal cancer, laryngeal cancer, pharyngeal cancer or lymphatic cancer, state:

- A. The type of cancer and the date on which Defendant or its subsidiary or predecessor first learned that such diseases were caused by inhalation of asbestos fibers by humans.
- B. What cancers has the Defendant or its subsidiary or predecessor become aware can be caused by exposure to asbestos fiber?
- C. The date on which Defendant first suspected other cancers were caused by asbestos inhalation.
- D. Who within the company or its subsidiary or predecessor first discovered the adverse consequences or effects of asbestos exposure.
- E. What information was disseminated with Defendant's company or its subsidiary or predecessor regarding such adverse consequences or effects.
- F. Whether any such information is still maintained by Defendant or its subsidiary or predecessor in a written form.
- G. Who is the custodian of such information.

ANSWER: GE objects to plaintiff's discovery on the grounds that it is overly broad, unreasonably burdensome, not reasonably tailored to the issues of the case, and not reasonably calculated to lead to the discovery of admissible evidence. Plaintiff's discovery should be product and defendant specific, and limited to plaintiff's places of employment and corresponding time periods. In this case, plaintiffs have alleged exposure to GE land-based steam turbines and its responses are accordingly directed to those products. Further, GE objects to the extent plaintiff's discovery goes beyond the scope of the exposure that plaintiff himself has alleged. GE is a large, decentralized company whose products and businesses change constantly. Due to its size and the fact that it has facilities in numerous states and foreign countries, there is no central repository for information of the type sought by way of the discovery. GE no longer has, or never had, many of the documents apparently required to answer this discovery. In light of the over-breadth of plaintiff's inquiries, it is essentially impossible for GE to conduct a search for the information sought and GE therefore objects. GE also objects to plaintiff's discovery to the extent it potentially calls for the disclosure of privileged and confidential information protected by the attorney client privilege, the work product doctrine, trade secrets, and other exclusions from discovery. It is impossible for GE to make any more specific privilege objections due to the over breadth of this discovery and due to other objectionable aspects of the discovery.

Subject to the foregoing objections, See Response to Interrogatory No. 19.

INTERROGATORY NO. 30.:

Does Defendant contend that asbestos products can be manufactured or designed so as to eliminate all potential health hazards to persons working with or exposed to them? If the answer is affirmative, explain in detail, and attach any studies or surveys on which this answer is based.

ANSWER: GE objects to plaintiff's discovery on the grounds that it is overly broad, unreasonably burdensome, not reasonably tailored to the issues of the case, and not reasonably calculated to lead to the discovery of admissible evidence. Plaintiff's discovery should be product and defendant specific, and limited to plaintiff's places of employment and corresponding time periods. In this case, plaintiffs have alleged exposure to GE land-based steam turbines and its responses are accordingly directed to those products. Further, GE objects to the extent plaintiff's discovery goes beyond the scope of the exposure that plaintiff himself has alleged. GE is a large, decentralized company whose products and businesses change constantly. Due to its size and the fact that it has facilities in numerous states and foreign countries, there is no central repository for information of the type sought by way of the discovery. GE no longer has, or never had, many of the documents apparently required to answer this discovery. In light of the over-breadth of plaintiff's inquiries, it is essentially impossible for GE to conduct a search for the information sought and GE therefore objects. GE also objects to plaintiff's discovery to the extent it potentially calls for the disclosure of privileged and confidential information protected by the attorney client privilege, the work product doctrine, trade secrets, and other exclusions from discovery. It is impossible for GE to make any more specific privilege objections due to the over breadth of this discovery and due to other objectionable aspects of the discovery.

Subject to the foregoing objections, not applicable. GE's land-based steam turbines are not asbestos-containing products. See Response to Interrogatory No. 6.

INTERROGATORY NO. 31.:

Describe in detail the types of packages or packaging which Defendant or any of its subsidiary or predecessor companies used for asbestos material or products, listing the dates each type of package was used, a physical description of each type of package, and providing a description of any printed material or trademarks that appeared thereon.

ANSWER: GE objects to plaintiff's discovery on the grounds that it is overly broad, unreasonably burdensome, not reasonably tailored to the issues of the case, and not reasonably calculated to lead to the discovery of admissible evidence. Plaintiff's discovery should be product and defendant specific, and limited to plaintiff's places of employment and corresponding time periods. In this case, plaintiffs have alleged exposure to GE land-based steam turbines and its responses are accordingly directed to those products. Further, GE objects to the extent plaintiff's discovery goes beyond the scope of the exposure that plaintiff himself has alleged. GE is a large, decentralized company whose products and businesses change constantly. Due to its size and the fact that it has facilities in numerous states and foreign countries, there is no central repository for information of the type sought by way of the discovery. GE no longer has, or never had, many of the documents apparently required to answer this discovery. In light of the over-breadth of plaintiff's inquiries, it is essentially impossible for GE to conduct a search for the information sought and GE therefore objects. GE also objects to plaintiff's discovery to the extent it potentially calls for the disclosure of privileged and confidential information protected by the attorney client privilege, the work product doctrine, trade secrets, and other exclusions from discovery. It is impossible for GE to make any more specific privilege objections due to the over breadth of this discovery and due to other objectionable aspects of the discovery.

Subject to the foregoing objections, GE's land-based steam turbines were loaded in rail cars, trucks, and/or large crates, which GE would not have retained or be able to track, if such still existed. **INTERROGATORY NO. 32.:**

Has Defendant or any of its subsidiary or predecessor companies at any time entered into a "rebranding" agreement with any other company, either as buyer or seller, concerning asbestos materials or asbestos products? If so, state, as to each such agreement:

- A. The name of the company manufacturing the asbestos products.
- B. The trade name affixed to those products.
- C. The periods of time covered by each such agreement.
- D. The volume, in dollar amount, of each transaction.
- E. The initial purchaser of the products.

ANSWER: GE objects to plaintiff's discovery on the grounds that it is overly broad, unreasonably burdensome, not reasonably tailored to the issues of the case, and not reasonably calculated to lead to the discovery of admissible evidence. Plaintiff's discovery should be product and defendant specific, and limited to plaintiff's places of employment and corresponding time periods. In this case, plaintiffs have alleged exposure to GE land-based steam turbines and its responses are accordingly directed to those products. Further, GE objects to the extent plaintiff's discovery goes beyond the scope of the exposure that plaintiff himself has alleged. GE is a large, decentralized company whose products and businesses change constantly. Due to its size and the fact that it has facilities in numerous states and foreign countries, there is no central repository for information of the type sought by way of the discovery. GE no longer has, or never had, many of the documents apparently required to answer this discovery. In light of the over-breadth of plaintiff's inquiries, it is essentially impossible for GE to conduct a search

for the information sought and GE therefore objects. GE also objects to plaintiff's discovery to the extent it potentially calls for the disclosure of privileged and confidential information protected by the attorney client privilege, the work product doctrine, trade secrets, and other exclusions from discovery. It is impossible for GE to make any more specific privilege objections due to the over breadth of this discovery and due to other objectionable aspects of the discovery.

Subject to the foregoing objections, to the best of GE's knowledge, no.

INTERROGATORY NO. 33.:

List the name and address of each company from which Defendant or its subsidiary or predecessor purchased materials or asbestos products which Defendant sold or distributed in any form, stating the form of the materials, the dates of such purchases, and the ultimate disposal of such materials.

ANSWER: GE objects to plaintiff's discovery on the grounds that it is overly broad, unreasonably burdensome, not reasonably tailored to the issues of the case, and not reasonably calculated to lead to the discovery of admissible evidence. Plaintiff's discovery should be product and defendant specific, and limited to plaintiff's places of employment and corresponding time periods. In this case, plaintiffs have alleged exposure to GE land-based steam turbines and its responses are accordingly directed to those products. Further, GE objects to the extent plaintiff's discovery goes beyond the scope of the exposure that plaintiff himself has alleged. GE is a large, decentralized company whose products and businesses change constantly. Due to its size and the fact that it has facilities in numerous states and foreign countries, there is no central repository for information of the type sought by way of the discovery. GE no longer has, or never had, many of the documents apparently required to answer this discovery. In light

of the over-breadth of plaintiff's inquiries, it is essentially impossible for GE to conduct a search for the information sought and GE therefore objects. GE also objects to plaintiff's discovery to the extent it potentially calls for the disclosure of privileged and confidential information protected by the attorney client privilege, the work product doctrine, trade secrets, and other exclusions from discovery. It is impossible for GE to make any more specific privilege objections due to the over breadth of this discovery and due to other objectionable aspects of the discovery.

Subject to the foregoing objections, not applicable. See Response to Interrogatory No. 6.

INTERROGATORY NO. 34.:

Does Defendant or any of its subsidiaries or predecessor currently have possession of any writings or contracts on those rebranding agreements set forth in the answer to Interrogatory No. 32? If the answer is affirmative, state:

- A. The name, address, and job title of each person having custody of each of those documents and their current location.
- B. A brief description of each such document, including the dates and the parties signatory.

ANSWER: GE objects to plaintiff's discovery on the grounds that it is overly broad, unreasonably burdensome, not reasonably tailored to the issues of the case, and not reasonably calculated to lead to the discovery of admissible evidence. Plaintiff's discovery should be product and defendant specific, and limited to plaintiff's places of employment and corresponding time periods. In this case, plaintiffs have alleged exposure to GE land-based steam turbines and its responses are accordingly directed to those products. Further, GE objects to the extent plaintiff's discovery goes beyond the scope of the exposure that plaintiff himself has alleged. GE is a large, decentralized company whose products and businesses change constantly.

Due to its size and the fact that it has facilities in numerous states and foreign countries, there is no central repository for information of the type sought by way of the discovery. GE no longer has, or never had, many of the documents apparently required to answer this discovery. In light of the over-breadth of plaintiff's inquiries, it is essentially impossible for GE to conduct a search for the information sought and GE therefore objects. GE also objects to plaintiff's discovery to the extent it potentially calls for the disclosure of privileged and confidential information protected by the attorney client privilege, the work product doctrine, trade secrets, and other exclusions from discovery. It is impossible for GE to make any more specific privilege objections due to the over breadth of this discovery and due to other objectionable aspects of the discovery.

Subject to the foregoing objections, not applicable. See Response to Interrogatory No.

32.

INTERROGATORY NO. 35.:

Prior to 1968, did any person file a claim against a Worker's Compensation carrier covering Defendant or any of its subsidiaries or predecessors alleging that he/she contracted a disease from inhaling asbestos fibers? If so, provide:

- A. A list of the claims, including each claimant's name, address and the date each claim was filed, and including the caption and jurisdiction of the claim.
- B. The disease alleged in each such claim.
- C. A brief summary of the disposition of each such claim.
- D. The name, address and title of the person having custody of the records pertaining to each such claim.

ANSWER: GE objects to plaintiff's discovery on the grounds that it is overly broad, unreasonably burdensome, not reasonably tailored to the issues of the case, and not reasonably

calculated to lead to the discovery of admissible evidence. Plaintiff's discovery should be product and defendant specific, and limited to plaintiff's places of employment and corresponding time periods. In this case, plaintiffs have alleged exposure to GE land-based steam turbines and its responses are accordingly directed to those products. Further, GE objects to the extent plaintiff's discovery goes beyond the scope of the exposure that plaintiff himself has alleged. GE is a large, decentralized company whose products and businesses change constantly. Due to its size and the fact that it has facilities in numerous states and foreign countries, there is no central repository for information of the type sought by way of the discovery. GE no longer has, or never had, many of the documents apparently required to answer this discovery. In light of the over-breadth of plaintiff's inquiries, it is essentially impossible for GE to conduct a search for the information sought and GE therefore objects. GE also objects to plaintiff's discovery to the extent it potentially calls for the disclosure of privileged and confidential information protected by the attorney client privilege, the work product doctrine, trade secrets, and other exclusions from discovery. It is impossible for GE to make any more specific privilege objections due to the over breadth of this discovery and due to other objectionable aspects of the discovery.

Subject to the foregoing objections, to the best of GE's knowledge, no.

INTERROGATORY NO. 36.:

Did Defendant or any of its subsidiaries or predecessors maintain written minutes of corporate meetings, either board of directors, departmental, or otherwise, which reflect discussions pertaining to any subject matter related to asbestos, asbestos health hazards or asbestos products? If so, for each such set of minutes, state:

A. The dates of each such meeting.

- B. The general subject matter discussed at each meeting.
- C. Who was in attendance at each meeting.
- D. Where and by whom the written minutes are presently maintained.
- E. By whom the minutes were taken and put into final format.
- F. Whether the minutes were abstracted and reports disseminated to other individuals, and if so, the names and job titles of those individuals.

ANSWER: GE objects to plaintiff's discovery on the grounds that it is overly broad, unreasonably burdensome, not reasonably tailored to the issues of the case, and not reasonably calculated to lead to the discovery of admissible evidence. Plaintiff's discovery should be product and defendant specific, and limited to plaintiff's places of employment and corresponding time periods. In this case, plaintiffs have alleged exposure to GE land-based steam turbines and its responses are accordingly directed to those products. Further, GE objects to the extent plaintiff's discovery goes beyond the scope of the exposure that plaintiff himself has alleged. GE is a large, decentralized company whose products and businesses change constantly. Due to its size and the fact that it has facilities in numerous states and foreign countries, there is no central repository for information of the type sought by way of the discovery. GE no longer has, or never had, many of the documents apparently required to answer this discovery. In light of the over-breadth of plaintiff's inquiries, it is essentially impossible for GE to conduct a search for the information sought and GE therefore objects. GE also objects to plaintiff's discovery to the extent it potentially calls for the disclosure of privileged and confidential information protected by the attorney client privilege, the work product doctrine, trade secrets, and other exclusions from discovery. It is impossible for GE to make any more specific privilege

objections due to the over breadth of this discovery and due to other objectionable aspects of the discovery.

Subject to the foregoing objections, GE is not aware of any such discussions or minutes.

See Response to Interrogatory No. 6.

INTERROGATORY NO. 37.:

Do you or any of your subsidiaries, including foreign business entities, currently manufacture any products containing asbestos? If so, state:

- A. As to each product, whether such product is mined, manufactured, and/or marketed or sold.
- B. The names and addresses of the companies mining, manufacturing, marketing, and/or selling each of those products.
- C. The trade or brand name of each of those products mined, manufactured, marketed, and/or sold.
- D. The date each of the named products was placed on the market.
- E. A description of the physical (chemical) composition of each of the named products, including the type of asbestos contained in the product.
- F. A description of the physical appearance of each product and its packaging.
- G. A detailed description of the intended uses of each of the named products.
- H. Whether there are any warning labels on said products or containers regarding potential asbestos-related health hazards.

ANSWER: GE objects to plaintiff's discovery on the grounds that it is overly broad, unreasonably burdensome, not reasonably tailored to the issues of the case, and not reasonably calculated to lead to the discovery of admissible evidence. Plaintiff's discovery should be product and defendant specific, and limited to plaintiff's places of employment and corresponding time periods. In this case, plaintiffs have alleged exposure to GE land-based

steam turbines and its responses are accordingly directed to those products. Further, GE objects to the extent plaintiff's discovery goes beyond the scope of the exposure that plaintiff himself has alleged. GE is a large, decentralized company whose products and businesses change constantly. Due to its size and the fact that it has facilities in numerous states and foreign countries, there is no central repository for information of the type sought by way of the discovery. GE no longer has, or never had, many of the documents apparently required to answer this discovery. In light of the over-breadth of plaintiff's inquiries, it is essentially impossible for GE to conduct a search for the information sought and GE therefore objects. GE also objects to plaintiff's discovery to the extent it potentially calls for the disclosure of privileged and confidential information protected by the attorney client privilege, the work product doctrine, trade secrets, and other exclusions from discovery. It is impossible for GE to make any more specific privilege objections due to the over breadth of this discovery and due to other objectionable aspects of the discovery.

Subject to the foregoing objections, to the best of GE's knowledge, no.

INTERROGATORY NO. 38.:

State whether you or any of your predecessors and/or subsidiaries maintain, from 1940 through the present or for any portion thereof, copies of invoices, shipping documents, bills of lading, purchase orders, or other documents of a similar nature relating to the mining, manufacture, marketing, sale or distribution of asbestos products. If so, state:

- A. The location of such documents.
- B. The name and address of the custodian of the documents.
- C. The format in which the documents are kept, i.e., hard copy, microfilm, microfiche, etc.

D. In what form the documents can be accessed, i.e., by state, by product, etc., and if by product, whether kept according to asbestos or non-asbestos.

ANSWER: GE objects to plaintiff's discovery on the grounds that it is overly broad, unreasonably burdensome, not reasonably tailored to the issues of the case, and not reasonably calculated to lead to the discovery of admissible evidence. Plaintiff's discovery should be product and defendant specific, and limited to plaintiff's places of employment and corresponding time periods. In this case, plaintiffs have alleged exposure to GE land-based steam turbines and its responses are accordingly directed to those products. Further, GE objects to the extent plaintiff's discovery goes beyond the scope of the exposure that plaintiff himself has alleged. GE is a large, decentralized company whose products and businesses change constantly. Due to its size and the fact that it has facilities in numerous states and foreign countries, there is no central repository for information of the type sought by way of the discovery. GE no longer has, or never had, many of the documents apparently required to answer this discovery. In light of the over-breadth of plaintiff's inquiries, it is essentially impossible for GE to conduct a search for the information sought and GE therefore objects. GE also objects to plaintiff's discovery to the extent it potentially calls for the disclosure of privileged and confidential information protected by the attorney client privilege, the work product doctrine, trade secrets, and other exclusions from discovery. It is impossible for GE to make any more specific privilege objections due to the over breadth of this discovery and due to other objectionable aspects of the discovery.

Subject to the foregoing objections, *see* response to Interrogatory No. 6.

INTERROGATORY NO. 39.:

Will you call company representatives as witnesses at the trial of any of these cases? If so, list:

- A. The name, address, and job title of each company representative who may be called.
- B. A summary of the testimony expected to be given by each such witness.
- C. List any and all previous times that the named witnesses have either given deposition or trial testimony in an asbestos-related case, including the jurisdiction, style of the case, case number, date of testimony, and the name of the attorney taking the deposition for the Plaintiffs in that case.

ANSWER: GE objects to plaintiff's discovery on the grounds that it is overly broad, unreasonably burdensome, not reasonably tailored to the issues of the case, and not reasonably calculated to lead to the discovery of admissible evidence. Plaintiff's discovery should be product and defendant specific, and limited to plaintiff's places of employment and corresponding time periods. In this case, plaintiffs have alleged exposure to GE land-based steam turbines and its responses are accordingly directed to those products. Further, GE objects to the extent plaintiff's discovery goes beyond the scope of the exposure that plaintiff himself has alleged. GE is a large, decentralized company whose products and businesses change constantly. Due to its size and the fact that it has facilities in numerous states and foreign countries, there is no central repository for information of the type sought by way of the discovery. GE no longer has, or never had, many of the documents apparently required to answer this discovery. In light of the over-breadth of plaintiff's inquiries, it is essentially impossible for GE to conduct a search for the information sought and GE therefore objects. GE also objects to plaintiff's discovery to the extent it potentially calls for the disclosure of privileged and confidential information

protected by the attorney client privilege, the work product doctrine, trade secrets, and other exclusions from discovery. It is impossible for GE to make any more specific privilege objections due to the over breadth of this discovery and due to other objectionable aspects of the discovery.

Subject to the foregoing objections, GE has not determined which witnesses, if any, it may call at the trial of this case. Witnesses who may be called upon to offer testimony on behalf of GE, when identified, will be named in accordance with the applicable Rules of Court, and GE specifically reserves its right to do so at a later date.

INTERROGATORY NO. 40.:

Have Defendant or its subsidiaries or predecessors ever acquired through purchase, reorganization, or merger another corporation, company, or business which manufactured, sold, processed, distributed, or contracted or supplied products containing asbestos? If so, for each such entity, state:

- A. Full and correct name;
- B. Principal place of business;
- C. State of incorporation;
- D. Date of acquisition by Defendant;
- E. Whether or not the business entity was ever authorized to transact business in the State of Texas.

ANSWER: GE objects to plaintiff's discovery on the grounds that it is overly broad, unreasonably burdensome, not reasonably tailored to the issues of the case, and not reasonably calculated to lead to the discovery of admissible evidence. Plaintiff's discovery should be product and defendant specific, and limited to plaintiff's places of employment and corresponding time periods. In this case, plaintiffs have alleged exposure to GE land-based

steam turbines and its responses are accordingly directed to those products. Further, GE objects to the extent plaintiff's discovery goes beyond the scope of the exposure that plaintiff himself has alleged. GE is a large, decentralized company whose products and businesses change constantly. Due to its size and the fact that it has facilities in numerous states and foreign countries, there is no central repository for information of the type sought by way of the discovery. GE no longer has, or never had, many of the documents apparently required to answer this discovery. In light of the over-breadth of plaintiff's inquiries, it is essentially impossible for GE to conduct a search for the information sought and GE therefore objects. GE also objects to plaintiff's discovery to the extent it potentially calls for the disclosure of privileged and confidential information protected by the attorney client privilege, the work product doctrine, trade secrets, and other exclusions from discovery. It is impossible for GE to make any more specific privilege objections due to the over breadth of this discovery and due to other objectionable aspects of the discovery.

Subject to the foregoing objections, to the best of GE's knowledge, no.

INTERROGATORY NO. 41.:

Was each of your asbestos products generally expected to reach, or packaged to reach, the consumer or user, without substantial change in the condition in which it was sold? If not, with respect to any such product, explain in what way the Defendant claims its products were altered or substantially changed after sale or distribution and before reaching the user.

ANSWER: GE objects to plaintiff's discovery on the grounds that it is overly broad, unreasonably burdensome, not reasonably tailored to the issues of the case, and not reasonably calculated to lead to the discovery of admissible evidence. Plaintiff's discovery should be product and defendant specific, and limited to plaintiff's places of employment and

corresponding time periods. In this case, plaintiffs have alleged exposure to GE land-based steam turbines and its responses are accordingly directed to those products. Further, GE objects to the extent plaintiff's discovery goes beyond the scope of the exposure that plaintiff himself has alleged. GE is a large, decentralized company whose products and businesses change constantly. Due to its size and the fact that it has facilities in numerous states and foreign countries, there is no central repository for information of the type sought by way of the discovery. GE no longer has, or never had, many of the documents apparently required to answer this discovery. In light of the over-breadth of plaintiff's inquiries, it is essentially impossible for GE to conduct a search for the information sought and GE therefore objects. GE also objects to plaintiff's discovery to the extent it potentially calls for the disclosure of privileged and confidential information protected by the attorney client privilege, the work product doctrine, trade secrets, and other exclusions from discovery. It is impossible for GE to make any more specific privilege objections due to the over breadth of this discovery and due to other objectionable aspects of the discovery.

Subject to the foregoing objections, See Response to Interrogatory No. 6.

INTERROGATORY NO. 42.:

For each asbestos-containing product identified in response to Interrogatory No. 6, identify all foreseeable users such as insulators, helpers, pipefitters, welders, machinists, plasterers, drywall finishers, carpenters, boilermakers, shipwrights and riggers, etc. of any of Defendant's asbestos-containing products.

ANSWER: GE objects to plaintiff's discovery on the grounds that it is overly broad, unreasonably burdensome, not reasonably tailored to the issues of the case, and not reasonably calculated to lead to the discovery of admissible evidence. Plaintiff's discovery should be

product and defendant specific, and limited to plaintiff's places of employment and corresponding time periods. In this case, plaintiffs have alleged exposure to GE land-based steam turbines and its responses are accordingly directed to those products. Further, GE objects to the extent plaintiff's discovery goes beyond the scope of the exposure that plaintiff himself has alleged. GE is a large, decentralized company whose products and businesses change constantly. Due to its size and the fact that it has facilities in numerous states and foreign countries, there is no central repository for information of the type sought by way of the discovery. GE no longer has, or never had, many of the documents apparently required to answer this discovery. In light of the over-breadth of plaintiff's inquiries, it is essentially impossible for GE to conduct a search for the information sought and GE therefore objects. GE also objects to plaintiff's discovery to the extent it potentially calls for the disclosure of privileged and confidential information protected by the attorney client privilege, the work product doctrine, trade secrets, and other exclusions from discovery. It is impossible for GE to make any more specific privilege objections due to the over breadth of this discovery and due to other objectionable aspects of the discovery.

Subject to the foregoing objections, See Response to Interrogatory No. 6.

INTERROGATORY NO. 43.:

Based upon the material contents of your asbestos-containing products, the method of manufacturing, and the method of application, can such products be generally applied without liberating asbestos fibers into the air?

- A. If there is a different answer concerning different products manufactured, sold, distributed, or used by your company, then specify the different products by precise manufacturer's name and popular name.

- B. If there is a difference in your answer depending on the year or years in which a particular product was used, then specify in detail what year or years you are referring to and the specific products you are referring to and year involved.

ANSWER: GE objects to plaintiff's discovery on the grounds that it is overly broad, unreasonably burdensome, not reasonably tailored to the issues of the case, and not reasonably calculated to lead to the discovery of admissible evidence. Plaintiff's discovery should be product and defendant specific, and limited to plaintiff's places of employment and corresponding time periods. In this case, plaintiffs have alleged exposure to GE land-based steam turbines and its responses are accordingly directed to those products. Further, GE objects to the extent plaintiff's discovery goes beyond the scope of the exposure that plaintiff himself has alleged. GE is a large, decentralized company whose products and businesses change constantly. Due to its size and the fact that it has facilities in numerous states and foreign countries, there is no central repository for information of the type sought by way of the discovery. GE no longer has, or never had, many of the documents apparently required to answer this discovery. In light of the over-breadth of plaintiff's inquiries, it is essentially impossible for GE to conduct a search for the information sought and GE therefore objects. GE also objects to plaintiff's discovery to the extent it potentially calls for the disclosure of privileged and confidential information protected by the attorney client privilege, the work product doctrine, trade secrets, and other exclusions from discovery. It is impossible for GE to make any more specific privilege objections due to the over breadth of this discovery and due to other objectionable aspects of the discovery.

Subject to the foregoing objections, not applicable. Land-based steam turbines are not asbestos-containing products. See Response to Interrogatory No. 6.

INTERROGATORY NO. 44.:

Was it a foreseeable use of your asbestos-containing products that they may have been removed, stripped, or replaced at some time after installation?

ANSWER: GE objects to plaintiff's discovery on the grounds that it is overly broad, unreasonably burdensome, not reasonably tailored to the issues of the case, and not reasonably calculated to lead to the discovery of admissible evidence. Plaintiff's discovery should be product and defendant specific, and limited to plaintiff's places of employment and corresponding time periods. In this case, plaintiffs have alleged exposure to GE land-based steam turbines and its responses are accordingly directed to those products. Further, GE objects to the extent plaintiff's discovery goes beyond the scope of the exposure that plaintiff himself has alleged. GE is a large, decentralized company whose products and businesses change constantly. Due to its size and the fact that it has facilities in numerous states and foreign countries, there is no central repository for information of the type sought by way of the discovery. GE no longer has, or never had, many of the documents apparently required to answer this discovery. In light of the over-breadth of plaintiff's inquiries, it is essentially impossible for GE to conduct a search for the information sought and GE therefore objects. GE also objects to plaintiff's discovery to the extent it potentially calls for the disclosure of privileged and confidential information protected by the attorney client privilege, the work product doctrine, trade secrets, and other exclusions from discovery. It is impossible for GE to make any more specific privilege objections due to the over breadth of this discovery and due to other objectionable aspects of the discovery.

Subject to the foregoing objections, not applicable. Land-based steam turbines are not asbestos-containing products. See Response to Interrogatory No. 6.

INTERROGATORY NO. 45.:

Before 1970, did you or your subsidiaries or predecessor(s) ever arrange for any labor inspectors, insurance company inspectors or anyone from your company to go to job sites where your products were being used or installed to make or take dust level counts? If so, state when this procedure started, the purpose of such procedures, and all results of such procedures.

ANSWER: GE objects to plaintiff's discovery on the grounds that it is overly broad, unreasonably burdensome, not reasonably tailored to the issues of the case, and not reasonably calculated to lead to the discovery of admissible evidence. Plaintiff's discovery should be product and defendant specific, and limited to plaintiff's places of employment and corresponding time periods. In this case, plaintiffs have alleged exposure to GE land-based steam turbines and its responses are accordingly directed to those products. Further, GE objects to the extent plaintiff's discovery goes beyond the scope of the exposure that plaintiff himself has alleged. GE is a large, decentralized company whose products and businesses change constantly. Due to its size and the fact that it has facilities in numerous states and foreign countries, there is no central repository for information of the type sought by way of the discovery. GE no longer has, or never had, many of the documents apparently required to answer this discovery. In light of the over-breadth of plaintiff's inquiries, it is essentially impossible for GE to conduct a search for the information sought and GE therefore objects. GE also objects to plaintiff's discovery to the extent it potentially calls for the disclosure of privileged and confidential information protected by the attorney client privilege, the work product doctrine, trade secrets, and other exclusions from discovery. It is impossible for GE to make any more specific privilege

objections due to the over breadth of this discovery and due to other objectionable aspects of the discovery.

Subject to the foregoing objections, land-based steam turbines are not asbestos-containing products, and any insulation placed on them was manufactured and installed by others ultimately based upon a determination by the utility. GE is therefore unaware of dust level counts performed on these insulation products. See Response to Interrogatory No. 6.

INTERROGATORY NO. 46.:

If Defendant performed or had performed any dust level counts, what action, based on the results, did your company take?

ANSWER: GE objects to plaintiff's discovery on the grounds that it is overly broad, unreasonably burdensome, not reasonably tailored to the issues of the case, and not reasonably calculated to lead to the discovery of admissible evidence. Plaintiff's discovery should be product and defendant specific, and limited to plaintiff's places of employment and corresponding time periods. In this case, plaintiffs have alleged exposure to GE land-based steam turbines and its responses are accordingly directed to those products. Further, GE objects to the extent plaintiff's discovery goes beyond the scope of the exposure that plaintiff himself has alleged. GE is a large, decentralized company whose products and businesses change constantly. Due to its size and the fact that it has facilities in numerous states and foreign countries, there is no central repository for information of the type sought by way of the discovery. GE no longer has, or never had, many of the documents apparently required to answer this discovery. In light of the over-breadth of plaintiff's inquiries, it is essentially impossible for GE to conduct a search for the information sought and GE therefore objects. GE also objects to plaintiff's discovery to

the extent it potentially calls for the disclosure of privileged and confidential information protected by the attorney client privilege, the work product doctrine, trade secrets, and other exclusions from discovery. It is impossible for GE to make any more specific privilege objections due to the over breadth of this discovery and due to other objectionable aspects of the discovery.

Subject to the foregoing objections, not applicable. See Response to Interrogatory No.

45.

INTERROGATORY NO. 47.:

Has your company or its subsidiaries or predecessor(s) ever conducted or caused to be conducted any studies designed to assist in minimizing or eliminating the inhalation of asbestos dust and fibers by those exposed to the use of your company's products? If so, give the following:

- A. Name of the person or firm conducting such studies;
- B. The date the studies began and the date they were completed;
- C. Any publication or other written dissemination of the results of the studies;
- D. The nature of any action to eliminate or minimize the inhalation of asbestos dust fibers.

ANSWER: GE objects to plaintiff's discovery on the grounds that it is overly broad, unreasonably burdensome, not reasonably tailored to the issues of the case, and not reasonably calculated to lead to the discovery of admissible evidence. Plaintiff's discovery should be product and defendant specific, and limited to plaintiff's places of employment and corresponding time periods. In this case, plaintiffs have alleged exposure to GE land-based steam turbines and its responses are accordingly directed to those products. Further, GE objects to the extent plaintiff's discovery goes beyond the scope of the exposure that plaintiff himself has

alleged. GE is a large, decentralized company whose products and businesses change constantly. Due to its size and the fact that it has facilities in numerous states and foreign countries, there is no central repository for information of the type sought by way of the discovery. GE no longer has, or never had, many of the documents apparently required to answer this discovery. In light of the over-breadth of plaintiff's inquiries, it is essentially impossible for GE to conduct a search for the information sought and GE therefore objects. GE also objects to plaintiff's discovery to the extent it potentially calls for the disclosure of privileged and confidential information protected by the attorney client privilege, the work product doctrine, trade secrets, and other exclusions from discovery. It is impossible for GE to make any more specific privilege objections due to the over breadth of this discovery and due to other objectionable aspects of the discovery.

Subject to the foregoing objections, land-based steam turbines are not asbestos-containing products, and any insulation placed on them was manufactured and installed by others based upon the determination of the utility. GE is therefore unaware of any studies conducted on these insulation products. See Response to Interrogatory No. 6.

INTERROGATORY NO. 48.:

Does your company have, has it ever had, or have your predecessor(s) or subsidiaries ever had, a Research Department? If so, give the year such Research Department was established, and whether or not such Research Department has operated continuously since being established. State also:

- A. The amount of time and money expended each year on research concerning asbestos or asbestos-containing products?
- B. What percentage of gross sales did your company or its predecessor(s) spend on research concerning the health effects of asbestos?

C. State in detail the purposes, duties, and responsibilities of such Research Department.

ANSWER: GE objects to plaintiff's discovery on the grounds that it is overly broad, unreasonably burdensome, not reasonably tailored to the issues of the case, and not reasonably calculated to lead to the discovery of admissible evidence. Plaintiff's discovery should be product and defendant specific, and limited to plaintiff's places of employment and corresponding time periods. In this case, plaintiffs have alleged exposure to GE land-based steam turbines and its responses are accordingly directed to those products. Further, GE objects to the extent plaintiff's discovery goes beyond the scope of the exposure that plaintiff himself has alleged. GE is a large, decentralized company whose products and businesses change constantly. Due to its size and the fact that it has facilities in numerous states and foreign countries, there is no central repository for information of the type sought by way of the discovery. GE no longer has, or never had, many of the documents apparently required to answer this discovery. In light of the over-breadth of plaintiff's inquiries, it is essentially impossible for GE to conduct a search for the information sought and GE therefore objects. GE also objects to plaintiff's discovery to the extent it potentially calls for the disclosure of privileged and confidential information protected by the attorney client privilege, the work product doctrine, trade secrets, and other exclusions from discovery. It is impossible for GE to make any more specific privilege objections due to the over breadth of this discovery and due to other objectionable aspects of the discovery.

Subject to the foregoing objections, because GE is a large, decentralized corporation, it did not have such a centralized "department," per se, as described by way of the instant

Interrogatory. GE did, however, employ industrial hygienists and medical doctors at certain of its plants during certain periods of time which may or may not be relevant to the instant litigation. GE's largest facility and headquarters prior to 1974 was its Schenectady works where the products described above were made. GE's Schenectady works over time employed safety engineers and medical personnel. GE states that the personnel of these respective businesses would have kept apprised of safety standards as they related to the operation of GE's respective businesses. GE further states that because it is a large, decentralized company with facilities in numerous states and foreign countries, because there is no central repository for information of the type sought by way of the instant Interrogatory, and because GE no longer has, or never had, many of the documents required to answer this Interrogatory, its response may not be comprehensive at this time and it reserves the right to supplement its responses. Investigation continues.

INTERROGATORY NO. 49.:

Does your company have, or has it ever had, or have your predecessor(s) or subsidiaries ever had, a Medical Department? If so, state:

- A. The year such Medical Department was established;
- B. Whether or not such Medical Department has operated continuously since being established;
- C. The name of each director, chief, or head of your Medical Department year by year, beginning with the first year you had a Medical Director or Medical Department, and the last known address and phone number of each;
- D. State the duties and responsibilities of such Medical Department.

ANSWER: GE objects to plaintiff's discovery on the grounds that it is overly broad, unreasonably burdensome, not reasonably tailored to the issues of the case, and not reasonably

calculated to lead to the discovery of admissible evidence. Plaintiff's discovery should be product and defendant specific, and limited to plaintiff's places of employment and corresponding time periods. In this case, plaintiffs have alleged exposure to GE land-based steam turbines and its responses are accordingly directed to those products. Further, GE objects to the extent plaintiff's discovery goes beyond the scope of the exposure that plaintiff himself has alleged. GE is a large, decentralized company whose products and businesses change constantly. Due to its size and the fact that it has facilities in numerous states and foreign countries, there is no central repository for information of the type sought by way of the discovery. GE no longer has, or never had, many of the documents apparently required to answer this discovery. In light of the over-breadth of plaintiff's inquiries, it is essentially impossible for GE to conduct a search for the information sought and GE therefore objects. GE also objects to plaintiff's discovery to the extent it potentially calls for the disclosure of privileged and confidential information protected by the attorney client privilege, the work product doctrine, trade secrets, and other exclusions from discovery. It is impossible for GE to make any more specific privilege objections due to the over breadth of this discovery and due to other objectionable aspects of the discovery.

Subject to the foregoing objections, See Response to Interrogatory No. 48.

INTERROGATORY NO. 50.:

Did your company or its predecessor(s) or subsidiaries ever place any warning directly on any of its asbestos-containing product or on their packaging. If so, identify the product(s) and year said warning was first applied.

ANSWER: GE objects to plaintiff's discovery on the grounds that it is overly broad, unreasonably burdensome, not reasonably tailored to the issues of the case, and not reasonably

calculated to lead to the discovery of admissible evidence. Plaintiff's discovery should be product and defendant specific, and limited to plaintiff's places of employment and corresponding time periods. In this case, plaintiffs have alleged exposure to GE land-based steam turbines and its responses are accordingly directed to those products. Further, GE objects to the extent plaintiff's discovery goes beyond the scope of the exposure that plaintiff himself has alleged. GE is a large, decentralized company whose products and businesses change constantly. Due to its size and the fact that it has facilities in numerous states and foreign countries, there is no central repository for information of the type sought by way of the discovery. GE no longer has, or never had, many of the documents apparently required to answer this discovery. In light of the over-breadth of plaintiff's inquiries, it is essentially impossible for GE to conduct a search for the information sought and GE therefore objects. GE also objects to plaintiff's discovery to the extent it potentially calls for the disclosure of privileged and confidential information protected by the attorney client privilege, the work product doctrine, trade secrets, and other exclusions from discovery. It is impossible for GE to make any more specific privilege objections due to the over breadth of this discovery and due to other objectionable aspects of the discovery.

Subject to the foregoing objections, not applicable. See Responses to Interrogatory Nos.

6 and 14.

INTERROGATORY NO. 51.:

Did your company or its predecessor(s) or subsidiaries ever stamp or place the name of the company, its initials, or any identifying logo on any of its asbestos-containing products? If so, please state the name brand names of such products, a description of such stamp or logo and the dates such were place on the referred products.

ANSWER: GE objects to plaintiff's discovery on the grounds that it is overly broad, unreasonably burdensome, not reasonably tailored to the issues of the case, and not reasonably calculated to lead to the discovery of admissible evidence. Plaintiff's discovery should be product and defendant specific, and limited to plaintiff's places of employment and corresponding time periods. In this case, plaintiffs have alleged exposure to GE land-based steam turbines and its responses are accordingly directed to those products. Further, GE objects to the extent plaintiff's discovery goes beyond the scope of the exposure that plaintiff himself has alleged. GE is a large, decentralized company whose products and businesses change constantly. Due to its size and the fact that it has facilities in numerous states and foreign countries, there is no central repository for information of the type sought by way of the discovery. GE no longer has, or never had, many of the documents apparently required to answer this discovery. In light of the over-breadth of plaintiff's inquiries, it is essentially impossible for GE to conduct a search for the information sought and GE therefore objects. GE also objects to plaintiff's discovery to the extent it potentially calls for the disclosure of privileged and confidential information protected by the attorney client privilege, the work product doctrine, trade secrets, and other exclusions from discovery. It is impossible for GE to make any more specific privilege objections due to the over breadth of this discovery and due to other objectionable aspects of the discovery.

Subject to the foregoing objections, certain GE land-based steam turbines may have contained the GE logo, which is a cursive, capitalized "GE" in a circle.

INTERROGATORY NO. 52.:

Has your company, or your predecessor(s) or subsidiaries, ever devised a research plan to develop, or actually developed or had developed, a product which did not contain asbestos and which could be substituted for one or more of your asbestos-containing products? If so, state the date that such research plan was begun and when such asbestos-free product was first placed on the market.

ANSWER: GE objects to plaintiff's discovery on the grounds that it is overly broad, unreasonably burdensome, not reasonably tailored to the issues of the case, and not reasonably calculated to lead to the discovery of admissible evidence. Plaintiff's discovery should be product and defendant specific, and limited to plaintiff's places of employment and corresponding time periods. In this case, plaintiffs have alleged exposure to GE land-based steam turbines and its responses are accordingly directed to those products. Further, GE objects to the extent plaintiff's discovery goes beyond the scope of the exposure that plaintiff himself has alleged. GE is a large, decentralized company whose products and businesses change constantly. Due to its size and the fact that it has facilities in numerous states and foreign countries, there is no central repository for information of the type sought by way of the discovery. GE no longer has, or never had, many of the documents apparently required to answer this discovery. In light of the over-breadth of plaintiff's inquiries, it is essentially impossible for GE to conduct a search for the information sought and GE therefore objects. GE also objects to plaintiff's discovery to the extent it potentially calls for the disclosure of privileged and confidential information protected by the attorney client privilege, the work product doctrine, trade secrets, and other exclusions from discovery. It is impossible for GE to make any more specific privilege objections due to the over breadth of this discovery and due to other objectionable aspects of the discovery.

Subject to the foregoing objections, not applicable. See Response to Interrogatory No. 6.

INTERROGATORY NO. 53.:

Did your company or its predecessor(s) or subsidiaries ever recall any products containing asbestos from the market or stream of commerce? If so, state:

- A. All details of such recall;
- B. The name of the product recalled, including the reason for the recall and the names and current addresses of those individuals who determined that it should take place;
- C. The dates of recall;
- D. The purpose for the recall.

ANSWER: GE objects to plaintiff's discovery on the grounds that it is overly broad, unreasonably burdensome, not reasonably tailored to the issues of the case, and not reasonably calculated to lead to the discovery of admissible evidence. Plaintiff's discovery should be product and defendant specific, and limited to plaintiff's places of employment and corresponding time periods. In this case, plaintiffs have alleged exposure to GE land-based steam turbines and its responses are accordingly directed to those products. Further, GE objects to the extent plaintiff's discovery goes beyond the scope of the exposure that plaintiff himself has alleged. GE is a large, decentralized company whose products and businesses change constantly. Due to its size and the fact that it has facilities in numerous states and foreign countries, there is no central repository for information of the type sought by way of the discovery. GE no longer has, or never had, many of the documents apparently required to answer this discovery. In light of the over-breadth of plaintiff's inquiries, it is essentially impossible for GE to conduct a search for the information sought and GE therefore objects. GE also objects to plaintiff's discovery to the extent it potentially calls for the disclosure of privileged and confidential information

protected by the attorney client privilege, the work product doctrine, trade secrets, and other exclusions from discovery. It is impossible for GE to make any more specific privilege objections due to the over breadth of this discovery and due to other objectionable aspects of the discovery.

Subject to the foregoing objections, not applicable. See Response to Interrogatory No. 6.

INTERROGATORY NO. 54.:

Before 1970, did you ever manufacture or sell products which did not contain asbestos and which could be substituted for your asbestos-containing products? If so, state the date such asbestos-free products were first placed on the market.

ANSWER: GE objects to plaintiff's discovery on the grounds that it is overly broad, unreasonably burdensome, not reasonably tailored to the issues of the case, and not reasonably calculated to lead to the discovery of admissible evidence. Plaintiff's discovery should be product and defendant specific, and limited to plaintiff's places of employment and corresponding time periods. In this case, plaintiffs have alleged exposure to GE land-based steam turbines and its responses are accordingly directed to those products. Further, GE objects to the extent plaintiff's discovery goes beyond the scope of the exposure that plaintiff himself has alleged. GE is a large, decentralized company whose products and businesses change constantly. Due to its size and the fact that it has facilities in numerous states and foreign countries, there is no central repository for information of the type sought by way of the discovery. GE no longer has, or never had, many of the documents apparently required to answer this discovery. In light of the over-breadth of plaintiff's inquiries, it is essentially impossible for GE to conduct a search for the information sought and GE therefore objects. GE also objects to plaintiff's discovery to the extent it potentially calls for the disclosure of privileged and confidential information

protected by the attorney client privilege, the work product doctrine, trade secrets, and other exclusions from discovery. It is impossible for GE to make any more specific privilege objections due to the over breadth of this discovery and due to other objectionable aspects of the discovery.

Subject to the foregoing objections, not applicable. See Response to Interrogatory No. 6.

INTERROGATORY NO. 55.:

Have any products you identified in your response to Interrogatory Nos. 52 and 54 not performed as intended? Please list all such products that have not performed as intended.

ANSWER: GE objects to plaintiff's discovery on the grounds that it is overly broad, unreasonably burdensome, not reasonably tailored to the issues of the case, and not reasonably calculated to lead to the discovery of admissible evidence. Plaintiff's discovery should be product and defendant specific, and limited to plaintiff's places of employment and corresponding time periods. In this case, plaintiffs have alleged exposure to GE land-based steam turbines and its responses are accordingly directed to those products. Further, GE objects to the extent plaintiff's discovery goes beyond the scope of the exposure that plaintiff himself has alleged. GE is a large, decentralized company whose products and businesses change constantly. Due to its size and the fact that it has facilities in numerous states and foreign countries, there is no central repository for information of the type sought by way of the discovery. GE no longer has, or never had, many of the documents apparently required to answer this discovery. In light of the over-breadth of plaintiff's inquiries, it is essentially impossible for GE to conduct a search for the information sought and GE therefore objects. GE also objects to plaintiff's discovery to the extent it potentially calls for the disclosure of privileged and confidential information

protected by the attorney client privilege, the work product doctrine, trade secrets, and other exclusions from discovery. It is impossible for GE to make any more specific privilege objections due to the over breadth of this discovery and due to other objectionable aspects of the discovery.

Subject to the foregoing objections, not applicable. See Responses to Interrogatory Nos. 52 and 54.

INTERROGATORY NO. 56.:

Did your company or its predecessor(s) or subsidiaries ever make, order, or arrange for any industrial hygiene surveys regarding asbestos or asbestos-containing dust? If so, give the date of such surveys and state who, or what entity, was responsible for completion of such surveys.

ANSWER: GE objects to plaintiff's discovery on the grounds that it is overly broad, unreasonably burdensome, not reasonably tailored to the issues of the case, and not reasonably calculated to lead to the discovery of admissible evidence. Plaintiff's discovery should be product and defendant specific, and limited to plaintiff's places of employment and corresponding time periods. In this case, plaintiffs have alleged exposure to GE land-based steam turbines and its responses are accordingly directed to those products. Further, GE objects to the extent plaintiff's discovery goes beyond the scope of the exposure that plaintiff himself has alleged. GE is a large, decentralized company whose products and businesses change constantly. Due to its size and the fact that it has facilities in numerous states and foreign countries, there is no central repository for information of the type sought by way of the discovery. GE no longer has, or never had, many of the documents apparently required to answer this discovery. In light of the over-breadth of plaintiff's inquiries, it is essentially impossible for GE to conduct a search

for the information sought and GE therefore objects. GE also objects to plaintiff's discovery to the extent it potentially calls for the disclosure of privileged and confidential information protected by the attorney client privilege, the work product doctrine, trade secrets, and other exclusions from discovery. It is impossible for GE to make any more specific privilege objections due to the over breadth of this discovery and due to other objectionable aspects of the discovery.

Subject to the foregoing objections, land-based steam turbines are not asbestos-containing products, and any insulation placed on them was manufactured and installed by others based upon a determination of the utility. *See* Response to Interrogatory No. 6.

INTERROGATORY NO. 57.:

As to either the threshold limit values or maximum allowable concentrations of both asbestos dust and total dust provided by the American Conference of Governmental Industrial Hygienists, state:

- A. The year in which Defendant or any predecessor(s) or subsidiaries were first advised of such limits or concentrations;
- B. The name of the employee or official of the company receiving such advice;
- C. How Defendant received notice of such limits or concentrations.

ANSWER: GE objects to plaintiff's discovery on the grounds that it is overly broad, unreasonably burdensome, not reasonably tailored to the issues of the case, and not reasonably calculated to lead to the discovery of admissible evidence. Plaintiff's discovery should be product and defendant specific, and limited to plaintiff's places of employment and corresponding time periods. In this case, plaintiffs have alleged exposure to GE land-based steam turbines and its responses are accordingly directed to those products. Further, GE objects

to the extent plaintiff's discovery goes beyond the scope of the exposure that plaintiff himself has alleged. GE is a large, decentralized company whose products and businesses change constantly. Due to its size and the fact that it has facilities in numerous states and foreign countries, there is no central repository for information of the type sought by way of the discovery. GE no longer has, or never had, many of the documents apparently required to answer this discovery. In light of the over-breadth of plaintiff's inquiries, it is essentially impossible for GE to conduct a search for the information sought and GE therefore objects. GE also objects to plaintiff's discovery to the extent it potentially calls for the disclosure of privileged and confidential information protected by the attorney client privilege, the work product doctrine, trade secrets, and other exclusions from discovery. It is impossible for GE to make any more specific privilege objections due to the over breadth of this discovery and due to other objectionable aspects of the discovery.

Subject to the foregoing objections, GE believes it probably learned of such information at or about the time it was promulgated but does not know the answers to subparts b and c.

INTERROGATORY NO. 58.:

Were the threshold limit values or maximum allowable concentrations inquired about in Interrogatory No. 57 for total dust, and not asbestos dust alone?

ANSWER: GE objects to plaintiff's discovery on the grounds that it is overly broad, unreasonably burdensome, not reasonably tailored to the issues of the case, and not reasonably calculated to lead to the discovery of admissible evidence. Plaintiff's discovery should be product and defendant specific, and limited to plaintiff's places of employment and corresponding time periods. In this case, plaintiffs have alleged exposure to GE land-based

steam turbines and its responses are accordingly directed to those products. Further, GE objects to the extent plaintiff's discovery goes beyond the scope of the exposure that plaintiff himself has alleged. GE is a large, decentralized company whose products and businesses change constantly. Due to its size and the fact that it has facilities in numerous states and foreign countries, there is no central repository for information of the type sought by way of the discovery. GE no longer has, or never had, many of the documents apparently required to answer this discovery. In light of the over-breadth of plaintiff's inquiries, it is essentially impossible for GE to conduct a search for the information sought and GE therefore objects. GE also objects to plaintiff's discovery to the extent it potentially calls for the disclosure of privileged and confidential information protected by the attorney client privilege, the work product doctrine, trade secrets, and other exclusions from discovery. It is impossible for GE to make any more specific privilege objections due to the over breadth of this discovery and due to other objectionable aspects of the discovery.

Subject to the foregoing objections, GE states that the TLV measured total dust.

INTERROGATORY NO. 59.:

State in detail what tests, if any, Defendant ever made with regard to the quantity, quality, or threshold limit values of asbestos dust or particles to which workers were exposed while using, working with or around, or installing your asbestos-containing products.

ANSWER: GE objects to plaintiff's discovery on the grounds that it is overly broad, unreasonably burdensome, not reasonably tailored to the issues of the case, and not reasonably calculated to lead to the discovery of admissible evidence. Plaintiff's discovery should be product and defendant specific, and limited to plaintiff's places of employment and corresponding time periods. In this case, plaintiffs have alleged exposure to GE land-based

steam turbines and its responses are accordingly directed to those products. Further, GE objects to the extent plaintiff's discovery goes beyond the scope of the exposure that plaintiff himself has alleged. GE is a large, decentralized company whose products and businesses change constantly. Due to its size and the fact that it has facilities in numerous states and foreign countries, there is no central repository for information of the type sought by way of the discovery. GE no longer has, or never had, many of the documents apparently required to answer this discovery. In light of the over-breadth of plaintiff's inquiries, it is essentially impossible for GE to conduct a search for the information sought and GE therefore objects. GE also objects to plaintiff's discovery to the extent it potentially calls for the disclosure of privileged and confidential information protected by the attorney client privilege, the work product doctrine, trade secrets, and other exclusions from discovery. It is impossible for GE to make any more specific privilege objections due to the over breadth of this discovery and due to other objectionable aspects of the discovery.

Subject to the foregoing objections, land-based steam turbines are not asbestos-containing products, and any insulation placed on them was manufactured and installed by others based upon a determination by the utility. See Response to Interrogatory No. 6.

INTERROGATORY NO. 60.:

Please state the following with respect to each expert witness you that you may call during trial of these cases. Please designate with specificity the expert witnesses that you may call, including:

- (a) The name, address, and job classification of each such expert witness;
- (b) The subject matter on which the expert is expected to testify;

- (c) The substance of the facts and opinions to which the expert is expected to testify and a summary of the grounds for each opinion;
- (d) Whether any person identified in subparagraph (a) above has provided a report or other documentation to you, and if so, identify and produce each such document or report;
- (e) Identify all documents that you have provided to each person identified in response to subparagraph (a) above;
- (f) Describe in detail the education and work history of, and identify any books, treatises, articles, published and unpublished reports, studies or other scholarly works authored by any individual identified in response to subparagraph (a) above. Alternatively, in lieu of said response, attach a copy of a resume or curriculum vitae and a list of publications to your answers.

ANSWER: GE objects to plaintiff's discovery on the grounds that it is overly broad, unreasonably burdensome, not reasonably tailored to the issues of the case, and not reasonably calculated to lead to the discovery of admissible evidence. Plaintiff's discovery should be product and defendant specific, and limited to plaintiff's places of employment and corresponding time periods. In this case, plaintiffs have alleged exposure to GE land-based steam turbines and its responses are accordingly directed to those products. Further, GE objects to the extent plaintiff's discovery goes beyond the scope of the exposure that plaintiff himself has alleged. GE is a large, decentralized company whose products and businesses change constantly. Due to its size and the fact that it has facilities in numerous states and foreign countries, there is no central repository for information of the type sought by way of the discovery. GE no longer has, or never had, many of the documents apparently required to answer this discovery. In light of the over-breadth of plaintiff's inquiries, it is essentially impossible for GE to conduct a search for the information sought and GE therefore objects. GE also objects to plaintiff's discovery to the extent it potentially calls for the disclosure of privileged and confidential information

protected by the attorney client privilege, the work product doctrine, trade secrets, and other exclusions from discovery. It is impossible for GE to make any more specific privilege objections due to the over breadth of this discovery and due to other objectionable aspects of the discovery.

Subject to the foregoing objections, GE has not determined which expert witnesses, if any, it may call at the trial of this case. Expert witnesses who may be called upon to offer testimony on behalf of GE, when identified, will be named in accordance with the applicable Rules of the Court, and GE specifically reserves its right to do so at a later date.

INTERROGATORY NO. 61.:

Please state the name, present address and present telephone number, along with the experience and qualifications, if applicable, of each and every person, known to Defendant or to Defendant's agents, having knowledge of facts relevant to these cases involving, but not limited to:

- (a) Identification of asbestos-containing products to which each and every individual Plaintiff, separate and distinct from all other Plaintiffs within the group, allegedly was exposed or facts disputing the identification of asbestos-containing products in this case.
- (b) Each and every individual Plaintiff's, separate and distinct from all other Plaintiffs within the group, alleged damages, injuries and/or facts disputing each and every Plaintiff's alleged damages and/or injuries;
- (c) The negligence of any person or entity other than Defendant which Defendant contends was a cause of each and every individual Plaintiff's, separate and distinct from all other Plaintiffs within the group, alleged injuries and/or damages;
- (d) Each of Defendant's defenses enumerated in Defendant's last filed Answer in each of these cases.

ANSWER: GE objects to plaintiff's discovery on the grounds that it is overly broad, unreasonably burdensome, not reasonably tailored to the issues of the case, and not reasonably

calculated to lead to the discovery of admissible evidence. Plaintiff's discovery should be product and defendant specific, and limited to plaintiff's places of employment and corresponding time periods. In this case, plaintiffs have alleged exposure to GE land-based steam turbines and its responses are accordingly directed to those products. Further, GE objects to the extent plaintiff's discovery goes beyond the scope of the exposure that plaintiff himself has alleged. GE is a large, decentralized company whose products and businesses change constantly. Due to its size and the fact that it has facilities in numerous states and foreign countries, there is no central repository for information of the type sought by way of the discovery. GE no longer has, or never had, many of the documents apparently required to answer this discovery. In light of the over-breadth of plaintiff's inquiries, it is essentially impossible for GE to conduct a search for the information sought and GE therefore objects. GE also objects to plaintiff's discovery to the extent it potentially calls for the disclosure of privileged and confidential information protected by the attorney client privilege, the work product doctrine, trade secrets, and other exclusions from discovery. It is impossible for GE to make any more specific privilege objections due to the over breadth of this discovery and due to other objectionable aspects of the discovery.

Subject to the foregoing objections, investigation continues.

INTERROGATORY NO. 62.:

Please identify documents which will be used at time of trial, (Exhibit List, Deposition List), which are relevant to each of Defendant's enumerated defenses in Defendant's last filed Answer.

ANSWER: GE objects to plaintiff's discovery on the grounds that it is overly broad, unreasonably burdensome, not reasonably tailored to the issues of the case, and not reasonably

calculated to lead to the discovery of admissible evidence. Plaintiff's discovery should be product and defendant specific, and limited to plaintiff's places of employment and corresponding time periods. In this case, plaintiffs have alleged exposure to GE land-based steam turbines and its responses are accordingly directed to those products. Further, GE objects to the extent plaintiff's discovery goes beyond the scope of the exposure that plaintiff himself has alleged. GE is a large, decentralized company whose products and businesses change constantly. Due to its size and the fact that it has facilities in numerous states and foreign countries, there is no central repository for information of the type sought by way of the discovery. GE no longer has, or never had, many of the documents apparently required to answer this discovery. In light of the over-breadth of plaintiff's inquiries, it is essentially impossible for GE to conduct a search for the information sought and GE therefore objects. GE also objects to plaintiff's discovery to the extent it potentially calls for the disclosure of privileged and confidential information protected by the attorney client privilege, the work product doctrine, trade secrets, and other exclusions from discovery. It is impossible for GE to make any more specific privilege objections due to the over breadth of this discovery and due to other objectionable aspects of the discovery.

Subject to the foregoing objections, GE has not determined which exhibits, if any, it may use at the trial of this case. Exhibits that may be used on behalf of GE, when identified, will be named in accordance with the applicable Rules of Court, and GE specifically reserves its right to do so at a later date.

INTERROGATORY NO. 63.:

When, if ever, did Defendant or any of its predecessors-in-interest first receive a copy of the article entitled "A Health Survey of Pipe Covering Operations in Constructing Naval Vessels", published in January, 1946 in the Journal of Industrial Hygiene & Toxicology, and authored by W. Fleischer and P. Drinker, et al. ("the Fleischer-Drinker Report")?

- a. Identify the name and position of the employee or officer who received same;
- b. Please produce all documents generated by Defendant which discuss or in any way reference the "Fleischer-Drinker" study prior to 1968;
- c. Please produce all documents upon which your responses above are based;
- d. Please identify the name(s) and address(es) of any person(s) who can verify your above response;
- e. Did Defendant ever rely on the Fleischer-Drinker Report in whole or in part as a basis that Defendant's asbestos products could be used in the workplace without risk of asbestos-related health impacts to the consumer and/or bystander;
- f. If so, please produce every document which evidences in any way that Defendant relied on the Fleischer-Drinker Report in whole or in part for the proposition stated in Interrogatory No. 63(a) above;
- g. If your answer to 63(e) is yes, when was the first date Defendant relied on the Fleischer-Drinker Report in whole or in part for the proposition stated in 63(e) above?

ANSWER: GE objects to plaintiff's discovery on the grounds that it is overly broad, unreasonably burdensome, not reasonably tailored to the issues of the case, and not reasonably calculated to lead to the discovery of admissible evidence. Plaintiff's discovery should be product and defendant specific, and limited to plaintiff's places of employment and corresponding time periods. In this case, plaintiffs have alleged exposure to GE land-based steam turbines and its responses are accordingly directed to those products. Further, GE objects to the extent plaintiff's discovery goes beyond the scope of the exposure that plaintiff himself has alleged. GE is a large, decentralized company whose products and businesses change constantly.

Due to its size and the fact that it has facilities in numerous states and foreign countries, there is no central repository for information of the type sought by way of the discovery. GE no longer has, or never had, many of the documents apparently required to answer this discovery. In light of the over-breadth of plaintiff's inquiries, it is essentially impossible for GE to conduct a search for the information sought and GE therefore objects. GE also objects to plaintiff's discovery to the extent it potentially calls for the disclosure of privileged and confidential information protected by the attorney client privilege, the work product doctrine, trade secrets, and other exclusions from discovery. It is impossible for GE to make any more specific privilege objections due to the over breadth of this discovery and due to other objectionable aspects of the discovery.

Subject to the foregoing objections, GE states that it became aware of this study at or about the time it was released.

INTERROGATORY NO. 64.:

When, if ever, did Defendant or any of its predecessors-in-interest first receive a copy of the article entitled "A Study of Asbestos in the Asbestos Textile Industry", published in 1938 in Public Health Bill, No. 241, U.S. Public Health Service and authored by W. (c) Dreessen ("the Dreessen Report")?

- a. Identify the name and position of the employee or office who received same;
- b. Please produce all documents generated by Defendant which discuss or in any way reference the "Dreessen" study prior to 1968;
- c. Please produce all documents upon which your responses above are based;
- d. Please identify the name(s) and address(es) of any person(s) who can verify your above response;

- e. Did Defendant ever rely on the Dreessen Report in whole or in part as a basis that Defendant's asbestos products could be used in the workplace without risk of asbestos-related health impacts to the consumer and/or bystander;
- f. If so, please produce every document which evidences in any way that Defendant relied on the Dreessen Report in whole or in part for the proposition stated in Interrogatory No. 63(a) above;
- g. If your answer to 63(e) is yes, when was the first date Defendant relied on the Dreessen report in whole or in part for the proposition stated in 63(e) above?

ANSWER: GE objects to plaintiff's discovery on the grounds that it is overly broad, unreasonably burdensome, not reasonably tailored to the issues of the case, and not reasonably calculated to lead to the discovery of admissible evidence. Plaintiff's discovery should be product and defendant specific, and limited to plaintiff's places of employment and corresponding time periods. In this case, plaintiffs have alleged exposure to GE land-based steam turbines and its responses are accordingly directed to those products. Further, GE objects to the extent plaintiff's discovery goes beyond the scope of the exposure that plaintiff himself has alleged. GE is a large, decentralized company whose products and businesses change constantly. Due to its size and the fact that it has facilities in numerous states and foreign countries, there is no central repository for information of the type sought by way of the discovery. GE no longer has, or never had, many of the documents apparently required to answer this discovery. In light of the over-breadth of plaintiff's inquiries, it is essentially impossible for GE to conduct a search for the information sought and GE therefore objects. GE also objects to plaintiff's discovery to the extent it potentially calls for the disclosure of privileged and confidential information protected by the attorney client privilege, the work product doctrine, trade secrets, and other exclusions from discovery. It is impossible for GE to make any more specific privilege

objections due to the over breadth of this discovery and due to other objectionable aspects of the discovery.

Subject to the foregoing objections, See Response to Interrogatory No. 63.

REQUEST FOR PRODUCTION

REQUEST FOR PRODUCTION NO. 1.:

Please produce a true and correct copy of each photograph of each asbestos-containing product identified in answer to Interrogatory No. 4.

ANSWER: GE objects to plaintiff's discovery on the grounds that it is overly broad, unreasonably burdensome, not reasonably tailored to the issues of the case, and not reasonably calculated to lead to the discovery of admissible evidence. Plaintiff's discovery should be product and defendant specific, and limited to plaintiff's places of employment and corresponding time periods. In this case, plaintiffs have alleged exposure to GE land-based steam turbines and its responses are accordingly directed to those products. Further, GE objects to the extent plaintiff's discovery goes beyond the scope of the exposure that plaintiff himself has alleged. GE is a large, decentralized company whose products and businesses change constantly. Due to its size and the fact that it has facilities in numerous states and foreign countries, there is no central repository for information of the type sought by way of the discovery. GE no longer has, or never had, many of the documents apparently required to answer this discovery. In light of the over-breadth of plaintiff's inquiries, it is essentially impossible for GE to conduct a search for the information sought and GE therefore objects. GE also objects to plaintiff's discovery to the extent it potentially calls for the disclosure of privileged and confidential information protected by the attorney client privilege, the work product doctrine, trade secrets, and other exclusions from discovery. It is impossible for GE to make any more specific privilege objections due to the over breadth of this discovery and due to other objectionable aspects of the discovery.

GE further states that it manufactured land-based steam turbines. GE states that when plaintiffs identify the particular turbine sites at which he worked, GE will make available to plaintiff its existing master turbine file, service records, the drawings, part lists, and specifications for such turbines from its Schenectady, New York headquarters at a mutually agreeable time.

REQUEST FOR PRODUCTION NO. 2.:

Please produce any diagrams or schematics indicating, stating or detailing the existence of any of your subsidiaries, predecessors, or divisions as defined on Page 1 of these Interrogatories and Request for Production.

ANSWER: GE objects to plaintiff's discovery on the grounds that it is overly broad, unreasonably burdensome, not reasonably tailored to the issues of the case, and not reasonably calculated to lead to the discovery of admissible evidence. Plaintiff's discovery should be product and defendant specific, and limited to plaintiff's places of employment and corresponding time periods. In this case, plaintiffs have alleged exposure to GE land-based steam turbines and its responses are accordingly directed to those products. Further, GE objects to the extent plaintiff's discovery goes beyond the scope of the exposure that plaintiff himself has alleged. GE is a large, decentralized company whose products and businesses change constantly. Due to its size and the fact that it has facilities in numerous states and foreign countries, there is no central repository for information of the type sought by way of the discovery. GE no longer has, or never had, many of the documents apparently required to answer this discovery. In light of the over-breadth of plaintiff's inquiries, it is essentially impossible for GE to conduct a search for the information sought and GE therefore objects. GE also objects to plaintiff's discovery to the extent it potentially calls for the disclosure of privileged and confidential information

protected by the attorney client privilege, the work product doctrine, trade secrets, and other exclusions from discovery. It is impossible for GE to make any more specific privilege objections due to the over breadth of this discovery and due to other objectionable aspects of the discovery.

Subject to the foregoing objections, GE states that it is a large, decentralized company comprised of 12 separate businesses with over 239,000 employees, including 155,000 in the United States. GE operates in more than 100 countries around the world, including 250 manufacturing plants in 26 different nations. Since 1979, GE has bought and/or sold more than 1,000 businesses. Given the size of GE and the ever changing nature of its businesses and personnel, it would be nearly impossible to locate any such charts for the time period at issue here.

CAUSE NO. CC-99-8033-B

MALCOM LEE MURPHY, JR.,	)	IN THE COUNTY COURT
et al	)	
	)	
V.	)	AT LAW NO. 2
	)	
OWENS CORNING (a/k/a OWENS	)	
CORNING CORPORATION), et al	)	DALLAS COUNTY, TEXAS

VERIFICATION

BEFORE ME, undersigned notary, personally came and appeared

Bryce MacDonald

who, after first being duly sworn, did depose and state:

(1) I am the Remediation Manager of General Electric Company, and am authorized to execute this Verification of General Electric Company's Response to Plaintiffs' Master Interrogatories and Request for Production of Documents.

(2) I have reviewed General Electric Company's Response to Plaintiffs' Master Interrogatories. Although the matters stated in the foregoing interrogatory responses are not all within my personal knowledge, the information and facts stated in said interrogatory responses have been assembled by various authorized agents or employees of General Electric Company, and said interrogatory responses, to the best of my information, knowledge and belief, are true.

Bryce MacDonald

Subscribed and sworn to before me
this ____ day of October, 2000.

Notary Public

THOMPSON & KNIGHT

L.L.P.

ATTORNEYS AND COUNSELORS

1700 PACIFIC AVENUE • SUITE 3300
DALLAS, TEXAS 75201-4893

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E-Mail: glazer@tklaw.com

AUSTIN
DALLAS
FORT WORTH
HOUSTON
MONTERREY, MEXICO

October 11, 2000

HAND DELIVERED

Jim Hamlin, District Clerk
George L. Allen Sr. Courts Bldg
600 Commerce, 1st Floor
Dallas, Texas 75202

Re: *In Re: All Asbestos-related Personal Injury or Death Cases Filed
or to be Filed in Dallas County, Texas*

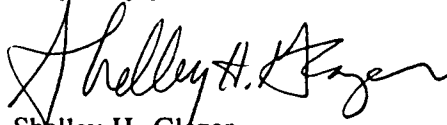
Dear Sir:

Please find enclosed for filing among the papers in the captioned matter the original and one copy of Defendant General Electric's Responses and Objections to Plaintiffs' Master Interrogatories and Requests for Production. This pleading is being filed without the signed verification for the interrogatory answers, but one will be forwarded for filing immediately upon receipt of same.

Please return a file-stamped copy of the enclosed to the courier herewith so that I will know it has been properly received and filed.

Thank you.

Very truly yours,



Shelley H. Glazer

SHG:lag

Enclosures

cc: Mr. Ben DuBose

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