

1 matter of this action and is not calculated to lead to the dis-
2 covery of admissible evidence.

3 INTERROGATORY NO. 21:

4 Does defendant have any records indicating that any of
5 its asbestos-containing products were sold or distributed to any
of the defendants named herein?

6 RESPONSE TO INTERROGATORY NO. 21:

7 Wagner objects to this Interrogatory on the grounds
8 that it is overly broad and unduly burdensome in that it does
9 not identify for which Wagner products it seeks information and,
10 is not relevant to the subject matter of this action and is not
11 calculated to lead to the discovery of admissible evidence in
12 that it is not limited to Wagner products to which Plaintiff
13 alleges exposure.

14 INTERROGATORY NO. 22:

15 If answer to Interrogatory No. 21 is affirmative,
16 please state:

17 (a) the name, address, and job classification of each
individual who currently has possession of such records;

18 (b) The names of each defendant named herein to whom
19 your products have been sold or distributed;

20 (c) The dates of each such sale;

21 (d) the amount and type of materials sold or distrib-
uted;

22 (e) Whether defendant manufactured asbestos-
23 containing products for any other business entity but placed
24 labels or logos not belonging to this defendant on said subsec-
tion.

25 RESPONSE TO INTERROGATORY NO. 22:

26 See Wagner's response to Interrogatory No. 21.

27 INTERROGATORY NO. 23:

28 Does defendant have policies of insurance that cover
the claims that have been made by plaintiff herein?