

(c) If said testimony was recorded.

RESPONSE:

Not to our knowledge.

INTERROGATORY NO. 83:

Please state the names and addresses of all distributors and companies to which the defendant sold or distributed asbestos or asbestos-containing products for the years 1930 to 1972.

RESPONSE:

OBJECTION. Interrogatory No. 83 is objected to on the grounds that it is overly broad, burdensome, oppressive and calls for a compilation or abstract of records which does not exist. The burden and expense to this responding defendant to compile the information sought, is not outweighed by the questionable evidentiary value of the information sought. Additionally, this defendant has maintained sales records only since 1976, therefore, this defendant has no way of knowing with certainty to whom its products may have been distributed over the several decades. Without waiving said objection, and in the spirit of liberal discovery, those companies to whom defendant sold asbestos-containing products are reflected in response to Interrogatory No. 122, in addition to NAPA.

INTERROGATORY NO. 84:

Please state whether defendant has knowledge of any material which could be or is being used for the same purpose as asbestos. Include in your answer when defendant discovered that said material could be used as a substitute for asbestos.

RESPONSE:

OBJECTION. Interrogatory No. 84 is objected to on the