

REQUEST FOR PRODUCTION NO. 26:

Please produce all documents relating to Defendants' corporate structure, including organizational charts applicable for the years 1968 through the present. Include, where applicable, documents identifying the names, addresses and titles of each of Defendants' directors, officers, division and department heads.

RESPONSE:

See Response to Request for Production No. 1, which is incorporated herein as if fully rewritten.

REQUEST FOR PRODUCTION NO. 27:

Please produce all correspondence and documents relating to any workers compensation claims filed against Defendants wherein an occupational lung disease is alleged as the occupational illness.

RESPONSE:

See Response to Request for Production No. 1, which is incorporated herein as if fully rewritten.

REQUEST FOR PRODUCTION NO. 28:

Please produce all documents prepared by an expert employed by Defendants and/or any other source regarding the relationship between exposure to asbestos-containing products and health and safety.

RESPONSE:

See Response to Request for Production No. 1, which is incorporated herein as if fully rewritten.

REQUEST FOR PRODUCTION NO. 28 [sic]:

Please produce all documents relating to insurance, including insurance agreements, policies and indemnity agreements with your

- a. general liability insurance carriers;
- b. products liability insurance carriers;
- c. excess insurance carriers;
- d. workmen's compensation insurance carriers;

RESPONSE:

See Response to Request for Production No. 1, which is incorporated herein as if fully rewritten.