

in one prior asbestos related law suit, as a premises defendant in 2006. The case did not involve any defendant-made products.

INTERROGATORY NO. 60:

Other than those previously identified, identify as follows each and every policy, procedure, step and/or program undertaken, implemented, discussed and/or contemplated by defendant and/or any predecessor/related entity involving and/or intended to involve protecting any person or persons (including, but not limited to, employees, product end-users and/or bystanders) in any way from exposure to asbestos, including, but not limited to, abatement, substitution, warnings, instructions, engineering controls, product modification and/or protective equipment:

- (a) Describe the policy, procedure, step and/or program and state its effective date(s);
- (b) Identify the person(s) who were the subject of protection; and,
- (c) Identify any and all documents referring to, relating to, and/or reflecting the same.

ANSWER: - Gleason objects to this Interrogatory as overly broad, burdensome, harassing, excessive in scope and time and incorrectly implying that its products were a health hazard. By way of further response, see documents provided.

INTERROGATORY NO. 61:

Has defendant and/or any predecessor/related entity ever performed any work and/or provided any product and/or service pursuant to any contract or agreement with the federal government? If so:

- (a) Beginning with the first year, state each year in which such products and/or services were provided;