

FILE NAME: AMMCO (AMC)

DATE: 1999 Oct 18

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DOCUMENT DESCRIPTION: Legal - Defendant's Objections to
Plaintiff's Deposition of Custodian of Records

(F)

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4 Attorneys for Defendant
5 AMMCO TOOLS, INC.,
sued herein as HENNESSY INDUSTRIES
6
7

8 IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA
9 IN AND FOR THE CITY AND COUNTY OF SAN FRANCISCO

10		)	NO. 999220
11	WENDY BOOK,	)	
12		)	AMMCO TOOLS, INC.'S OBJECTIONS
13	Plaintiff,	)	TO PLAINTIFF'S NOTICE OF TAKING
14	v.	)	DEPOSITION OF HENNESSY'S PERSON
15	ASBESTOS DEFENDANTS (BHC) As	)	MOST KNOWLEDGEABLE AND
16	Reflected on Exhibits B, C, G, H; and	)	CUSTODIAN OF RECORDS
17	DOES 1-800	)	
	Defendants.	)	

18 TO ALL PARTIES AND TO THEIR ATTORNEYS OF RECORD:

19 Defendant Ammco Tools, Inc. sued herein as Hennessy Industries, Inc.
20 ("Defendant") hereby objects to plaintiff's Notice of Taking Deposition and Request for
21 Production of Documents of Hennessy's Custodian of Records and Person Most
22 Knowledgeable, served by mail on October 18, 1999.

23 Defendant objects to the document requests and subject matter of testimony
24 which appear in the notice as follows:

25 GENERAL OBJECTIONS AND RESERVATIONS

26 All of the responses contained herein are based only upon such information and
27 documents which are presently available to and specifically known to this responding party.

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ENV-SF/36174

- 1 -
OBJECTION TO PLAINTIFF'S DEPOSITION NOTICE

EXHIBIT
A-1

1 1. The following responses are given without prejudice to responding
2 party's right to produce evidence of any subsequently discovered documents which this
3 responding party may later locate. Defendant accordingly reserves the right to change any
4 and all responses herein as additional investigation is undertaken, facts are ascertained,
5 analyses are made, legal research is completed and contentions are formulated. The responses
6 contained herein are made in a good faith effort to supply information presently known, but
7 should in no way be to the prejudice of Defendant in relation to further discovery, research or
8 analysis. These responses are made without prejudice to Defendant using or relying on at
9 trial any subsequently discovered documents or information, any evidence or documents not
10 currently existing, or on documents or information omitted from these responses as a result of
11 good faith oversight or error.

12 2. These responses are made solely for purposes of this action. Each
13 response is subject to all objections as to competence, relevance, materiality, propriety, and
14 admissibility, and to any and all other objections on any grounds that would require the
15 exclusion from evidence of any statement, if requests were asked of, or any statement
16 contained by, a witness at present testifying in court or at an arbitration hearing, all of which
17 objections and grounds are expressly reserved so that these may be made at trial or
18 arbitration.

19 3. Defendant objects to the requests for production, and each of them, to
20 the extent that they purport to require Defendant to conduct an investigation to obtain
21 information beyond its own currently existing records, or from its personnel, as unduly
22 burdensome and oppressive.

23 4. Defendant objects to these requests for production generally to the
24 extent they call for disclosure of information that would invade the privacy of third persons
25 who are not parties to this litigation.

26 5. Defendant objects to these requests for production, and each of them, to
27 the extent they call for production of information protected by the trade secrets privilege
28 provided in California Evidence Code section 1060 and in other applicable statutory and

1 common law, and to the extent they call for production of information that contains
2 confidential proprietary information of Defendant.

3 6. Defendant objects to these requests for production to the extent that any
4 requests for information are protected from disclosure by the attorney work product doctrine,
5 the attorney-client privilege and any other applicable doctrines or privileges.

6 7. Defendant expressly incorporates each and every objection and
7 reservation listed above into each and every response herein below.

8 OBJECTION TO LOCATION OF DEPOSITION

9 Hennessy further objects that the geographic location of the notice deposition is
10 outside of the statutory requirements, and thus fails to comply with the provisions of C.C.P.
11 2025(e)(1).

12 OBJECTIONS FOR CUSTODIAN OF RECORDS

13 Category No. 1:

14 All WRITINGS PERTAINING TO YOUR document retention policy.

15 Obiection to Category No. 1:

16 Defendant objects on the grounds that the request is overbroad, vague and
17 ambiguous.

18 Category No. 2:

19 All WRITINGS PERTAINING TO YOUR corporate history and structure,
20 including the identities of any and all of YOUR predecessors-in-interest.

21 Obiection to Category No. 2:

22 Defendant objects on the grounds that the request is overbroad, burdensome,
23 oppressive, and not reasonably calculated to lead to the discovery of admissible evidence.

24 Defendant objects to this request on the grounds that the request seeks information regarding
25 the rights of third persons who are not party to this litigation. Defendant also objects on the
26 grounds that the request is vague, ambiguous, compound and complex.

27 Category No. 3:

28 All contracts, invoices, bills, purchase orders, receipts, packing slips, bills of

1 lading, correspondence of other WRITINGS PERTAINING TO any and all sales of ARCING
2 MACHINES by YOU to the jobsites or companies identified on any of the attached Exhibit
3 "A" between 1965 and 1991, inclusive.

4 Objection to Category No. 3:

5 Defendant objects on the ground that the request is overbroad, burdensome and
6 oppressive. Defendant objects on the grounds that this request is harassing and not reasonably
7 calculated to lead to the discovery of admissible evidence. Defendant objects to this request
8 on the grounds that the request seeks information regarding the rights of third persons who
9 are not party to this litigation.

10 Category No. 4:

11 All contracts, invoices, bills, purchase orders, receipts, packing slips, bills of
12 lading, correspondence or other WRITINGS PERTAINING TO or identifying YOUR
13 distributors of any and all ARCING MACHINES MARKETING by YOU to the jobsites, or
14 companies identified on the attached Exhibit "A" between 1965 and 1991, inclusive.

15 Objection to Category No. 4:

16 Defendant objects on the ground that the request is overbroad, burdensome and
17 oppressive. Defendant objects on the grounds that this request is harassing and not reasonably
18 calculated to lead to the discovery of admissible evidence. Defendant objects to this request
19 on the grounds that the request seeks information regarding the rights of third persons who
20 are not party to this litigation.

21 Category No. 5:

22 All contracts, invoices, bills, purchase orders, receipts, packing slips, bills of
23 lading, correspondence or other WRITINGS PERTAINING TO or identifying the
24 manufacturer name, brand name, trade name and/or model number of any and all ARCING
25 MACHINES MARKETING by YOU to the jobsites or companies identified on the attached
26 Exhibit "A" between 1965 and 1991, inclusive.

27 Objection to Category No. 5:

28 Defendant objects on the ground that the request is overbroad, burdensome and

1 oppressive. Defendant objects on the grounds that this request is harassing and not reasonably
2 calculated to lead to the discovery of admissible evidence. Defendant objects to this request
3 on the grounds that the request seeks information regarding the rights of third persons who
4 are not party to this litigation.

5 Category No. 6:

6 All photographs, brochures, product catalogs, advertisements, specifications,
7 product data sheets, product safety sheets, flyers, and any other WRITINGS in YOUR
8 possession, custody or control PERTAINING TO any and all ARCING MACHINES
9 MARKETING by YOU to the jobsites or companies identified on the attached Exhibit "A"
10 between 1965 and 1991, inclusive.

11 Objection to Category No. 6:

12 Defendant objects on the grounds that the request is overbroad, vague and
13 ambiguous. Defendant also objects to this request to the extent that it seeks disclosure of
14 information which is confidential business, proprietary or trade secret matter. Defendant
15 further objects on the grounds that this request is harassing and not reasonably calculated to
16 lead to the discovery of admissible evidence.

17 Category No. 7:

18 All labels, logos, pictures, drawings, and any other WRITINGS in YOUR
19 possession, custody or control, located on any box, carton, or other packaging, or any
20 instructions or other materials included with any and all ARCING MACHINES MARKETING
21 by YOU in the states identified on the attached Exhibit "A" between 1965 and 1991,
22 inclusive.

23 Objection to Category No. 7:

24 Defendant objects to this request on the grounds that it is extremely vague,
25 ambiguous, unintelligible and calls for speculation as to what is being sought. Defendant
26 further objects to this request on the grounds that it is impermissibly overbroad in scope,
27 seeking information and documents that are not reasonably calculated to lead to the discovery
28 of admissible evidence.

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1 Category No. 8:

2 A sample or exemplar of a box, carton, other packaging or any instructions or
3 other materials included with any and all ARCING MACHINES MARKETING by YOU in the
4 states identified on the attached Exhibit "A" between 1965 and 1991, inclusive.

5 Objection to Category No. 8:

6 Defendant objects to this request on the grounds that it is extremely vague,
7 ambiguous, unintelligible and calls for speculation as to what is being sought. Defendant
8 further objects to this request on the grounds that it is impermissibly overbroad in scope, and
9 seeks information and documents that are not reasonably calculated to lead to the discovery of
10 admissible evidence.

11 Category No. 9:

12 All WRITINGS identifying the manufacturers' suggested uses or applications of
13 ARCING MACHINES MARKETING by YOU in the states identified in the attached
14 Exhibit "A" between 1965 and 1991, inclusive.

15 Objection to Category No. 9:

16 Defendant objects to this request on the grounds that it is extremely vague,
17 ambiguous, unintelligible and calls for speculation as to what is being sought. Defendant
18 further objects to this request on the grounds that it is impermissibly overbroad in scope, and
19 seeks information and documents that are not reasonably calculated to lead to the discovery of
20 admissible evidence.

21 Category No. 10:

22 All WRITINGS, correspondence or submissions by YOU to the United States
23 Federal Trade Commission PERTAINING TO ARCING MACHINES manufactured, sold,
24 distributed or MARKETING by YOU between 1965-1991, inclusive; including, but not limited
25 to sales figures or data submitted or received by YOU.

26 Objection to Category No. 10:

27 Defendant objects to this request on the grounds that it is extremely vague,
28 ambiguous, unintelligible and calls for speculation as to what is being sought. Defendant

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1 further objects to this request on the grounds that it is impermissibly overbroad in scope, and
2 seeks information and documents that are not reasonably calculated to lead to the discovery of
3 admissible evidence. Defendant further objects to this request to the extent that it seeks
4 disclosure of information which is confidential business, proprietary or trade secret matter.

5. Category No. 11:

6 All WRITINGS, correspondence or submissions by YOU to the any automotive
7 parts catalog, including but not limited the Sweets Catalog, PERTAINING TO or identifying
8 the manufacture name, brand name, trade name and/or model number of any an all ARCING
9 MACHINES MARKETING by YOU between 1965-1991, inclusive.

10 Objection to Category No. 11:

11 Defendant objects to this request on the grounds that it is extremely vague,
12 ambiguous, unintelligible and calls for speculation as to what is being sought. Defendant
13 further objects to this request on the grounds that it is impermissibly overbroad in scope,
14 seeking information and documents that are not reasonably calculated to lead to the discovery
15 of admissible evidence. Defendant further objects to this request to the extent that it seeks
16 disclosure of information which is confidential business, proprietary or trade secret matter.

17. Category No. 12:

18 All WRITINGS PERTAINING TO YOUR membership, association
19 involvement or correspondence with the Brake Linings Manufacturers Association between
20 1949-1950.

21 Objection to Category No. 12:

22 Defendant objects to this request on the grounds that it is extremely vague,
23 ambiguous, unintelligible and calls for speculation as to what is being sought. Defendant
24 further objects to this request on the grounds that it is impermissibly overbroad in scope, and
25 seeks information and documents that are not reasonably calculated to lead to the discovery of
26 admissible evidence. Defendant further objects to this request to the extent that it seeks
27 disclosure of information which is confidential business, proprietary or trade secret matter.

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1 Category No. 13:

2 All WRITINGS PERTAINING TO YOUR membership, association
3 involvement or correspondence with the Clutch Facing and Brake Linings Standards Institute
4 between 1949-1950, inclusive.

5 Objection to Category No. 13:

6 Defendant objects to this request on the grounds that it is extremely vague,
7 ambiguous, unintelligible and calls for speculation as to what is being sought. Defendant
8 further objects to this request on the grounds that it is impermissibly overbroad in scope, and
9 seeks information and documents that are not reasonably calculated to lead to the discovery of
10 admissible evidence. Defendant further objects to this request to the extent that it seeks
11 disclosure of information which is confidential business, proprietary or trade secret matter.

12 Category No. 14:

13 All WRITINGS PERTAINING TO YOUR membership, association,
14 involvement or correspondence with the Friction Materials Standards Institute between
15 1950-1991, inclusive.

16 Objection to Category No. 14:

17 Defendant objects to this request on the grounds that it is extremely vague,
18 ambiguous, unintelligible and calls for speculation as to what is being sought. Defendant
19 further objects to this request on the grounds that it is impermissibly overbroad in scope, and
20 seeks information and documents that are not reasonably calculated to lead to the discovery of
21 admissible evidence. Defendant further objects to this request to the extent that it seeks
22 disclosure of information which is confidential business, proprietary or trade secret matter.

23 Category No. 15:

24 All WRITINGS PERTAINING TO YOUR membership, association,
25 involvement or correspondence with the Industrial Hygiene Foundation.

26 Objection to Category No. 15:

27 Defendant objects to this request on the grounds that it is extremely vague,
ambiguous, unintelligible and calls for speculation as to what is being sought. Defendant

1 further objects to this request on the grounds that it is impermissibly overbroad in scope, and
2 seeks information and documents that are not reasonably calculated to lead to the discovery of
3 admissible evidence. Defendant further objects to this request to the extent that it seeks
4 disclosure of information which is confidential business, proprietary or trade secret matter.

5 Category No. 16:

6 All WRITINGS in YOUR possession, custody or control PERTAINING TO the
7 date on which YOU first became aware that there were health risks associated with exposure
8 to ACP or ASBESTOS.

9 Objection to Category No. 16:

10 Defendant objects on the grounds that the request is overbroad, vague and
11 ambiguous. Defendant objects to this request on the grounds that the request seeks
12 information regarding the rights of third persons who are not party to this litigation.
13 Defendant also objects to this request as not reasonably calculated to lead to the discovery of
14 admissible evidence, and improper under Civil Code §3295, as plaintiff is apparently pursuing
15 claims heard on the Consumer Expectation Theory.

16 Category No. 17:

17 All WRITINGS in YOUR possession, custody or control PERTAINING TO the
18 date on which YOU first placed any warnings on ARCING MACHINE boxes, cartons, other
19 packaging, warning or instruction manuals, or any other writings accompanying YOUR
20 ARCING MACHINES, concerning the health hazards associated with the use, work with or
21 handling of ACP or ASBESTOS.

22 Objection to Category No. 17:

23 Defendant objects to this request on the grounds that it is extremely vague,
24 ambiguous, unintelligible and calls for speculation as to what is being sought. Defendant
25 further objects to this request on the grounds that it is impermissibly overbroad in scope, and
26 seeks information and documents that are not reasonably calculated to lead to the discovery of
27 admissible evidence. Defendant further objects to this request to the extent it seeks disclosure
28 of information which is confidential business, proprietary or trade secret matter.

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1 subsequent to the date YOU first became aware that there were health risks associated with
2 exposure to ACP or ASBESTOS.

3 Objection to Category No. 20:

4 Defendant objects to this request on the grounds that it is extremely vague,
5 ambiguous, unintelligible and calls for speculation as to what is being sought. Defendant
6 further objects to this request on the grounds that it is impermissibly overbroad in scope,
7 seeks information and documents that are neither relevant to the subject matter of this action,
8 nor reasonably calculated to lead to the discovery of admissible evidence, and it is
9 burdensome, harassing and oppressive. Defendant also objects to this request to the extent
10 that it seeks disclosure of information which is confidential business, proprietary or trade
11 secret matter.

12 Category No. 21:

13 All photographs, motion pictures, videotape recordings, memoranda or any
14 other WRITINGS in YOUR possession, custody or control PERTAINING TO the results of
15 any and all studies performed by consultants hired by YOU concerning the health hazards
16 associated with exposure to ACP or ASBESTOS.

17 Objection to Category No. 21:

18 Defendant objects to this request on the grounds that it is extremely vague,
19 ambiguous, unintelligible and calls for speculation as to what is being sought. Defendant
20 further objects to this request on the grounds that it is impermissibly overbroad in scope, and
21 seeks information and documents that are not reasonably calculated to lead to the discovery
22 of admissible evidence. Defendant further objects to this request to the extent it seeks
23 disclosure of information which is confidential business, proprietary or trade secret matter.

24 Category No. 22:

25 All bulletins, memoranda, correspondence, notices and any other WRITINGS
26 in YOUR possession, custody or control PERTAINING TO any communication (written or
27 oral) by YOU to YOUR employees or others regarding the health hazards of exposure to
28 ACP or ASBESTOS.

1 Objection to Category No. 22:

2 Defendant objects to this request on the grounds that it is extremely vague,
3 ambiguous, unintelligible and calls for speculation as to what is being sought. Defendant
4 further objects to this request on the grounds that it is impermissibly overbroad in scope, and
5 seeks information and documents that are not reasonably calculated to lead to the discovery
6 of admissible evidence.

7 Category No. 23:

8 All WRITINGS which identify the individuals employed by YOU who were
9 responsible for the purchase or acquisition of component parts used for the manufacture,
10 fabrication, assembly, or other production of YOUR ARCING MACHINES during the years
11 1965 to 1991, inclusive.

12 Objection to Category No. 23:

13 Defendant objects to this request on the grounds that it is extremely vague,
14 ambiguous, unintelligible and calls for speculation as to what is being sought. Defendant
15 further objects to this request on the grounds that it is impermissibly overbroad in scope, and
16 seeks information and documents that are not reasonably calculated to lead to the discovery
17 of admissible evidence. Defendant also objects to the request on the grounds that it is
18 invasive of third-party privacy rights and plaintiffs have failed to properly notice the
19 deposition pursuant to Code of Civil Procedure sections 1985.3, 1985.6 and 2025(f).

20 Category No. 24:

21 All WRITINGS which identify the individuals employed by YOU who were
22 responsible for the manufacture, fabrication, assembly, or other production of ARCING
23 MACHINES by YOU during the years 1965 to 1991, inclusive.

24 Objection to Category No. 24:

25 Defendant objects to this request on the grounds that it is extremely vague,
26 ambiguous, unintelligible and calls for speculation as to what is being sought. Defendant
27 further objects to this request on the grounds that it is impermissibly overbroad in scope, and
28 seeks information and documents that are not reasonably calculated to lead to the discovery

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1 of admissible evidence. Defendant also objects to the request on the grounds that it is
2 invasive of third-party privacy rights and plaintiffs have failed to properly notice the
3 deposition pursuant to Code of Civil Procedure sections 1985.3, 1985.6 and 2025(f).

4 Category No. 25:

5 All WRITINGS which identified the individuals employed by YOU who were
6 responsible for the sale, supply, MARKETING, or distribution of ARCING MACHINES by
7 YOU in the states identified on the attached Exhibit "A" prior to and during the years 1965
8 to 1991, inclusive.

9 Objection to Category No. 25:

10 Defendant objects to this request on the grounds that it is extremely vague,
11 ambiguous, unintelligible and calls for speculation as to what is being sought. Defendant
12 further objects to this request on the grounds that it is impermissibly overbroad in scope, and
13 seeks information and documents that are not reasonably calculated to lead to the discovery
14 of admissible evidence. Defendant also objects to the request on the grounds that it is
15 invasive of third-party privacy rights and plaintiffs have failed to properly notice the
16 deposition pursuant to Code of Civil Procedure sections 1985.3, 1985.6 and 2025(f).

17 Category No. 26:

18 All DOCUMENTS regarding the EARLIEST Worker's Compensation claims
19 filed against YOU in which it was alleged that claimant suffered injuries resulting from
20 asbestos exposure. (For purposes of this demand, "EARLIEST" shall refer to the first five
21 years during which such claims were filed against you.)

22 Objection to Category No. 26:

23 Defendant objects to this request on the grounds that it is extremely vague,
24 ambiguous, unintelligible and calls for speculation as to what is being sought. Defendant
25 further objects to this request on the grounds that it is impermissibly overbroad in scope, and
26 seeks information and documents that are not reasonably calculated to lead to the discovery
27 of admissible evidence. Defendant also objects to the request on the grounds that it is
28 invasive of third-party privacy rights and plaintiffs have failed to properly notice the

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1 deposition pursuant to Code of Civil Procedure sections 1985.3, 1985.6 and 2025(f).

2 Category No. 27:

3 All WRITINGS regarding the EARLIEST personal injury claims filed against
4 YOU in which it was alleged that claimant suffered injuries resulting from asbestos exposure.
5 (For purposes of this demand, "EARLIEST" shall refer to the first five years during which
6 such claims were filed against you.)

7 Objection to Category No. 27:

8 Defendant objects to this request on the grounds that it is extremely vague,
9 ambiguous, unintelligible and calls for speculation as to what is being sought. Defendant
10 further objects to this request on the grounds that it is impermissibly overbroad in scope, and
11 seeks information and documents that are not reasonably calculated to lead to the discovery
12 of admissible evidence. Defendant also objects to the request on the grounds that it is
13 invasive of third-party privacy rights and plaintiffs have failed to properly notice the
14 deposition pursuant to Code of Civil Procedure sections 1985.3, 1985.6 and 2025(f).

15 Category No. 28:

16 All WRITINGS PERTAINING TO or identifying distributors or other entities
17 who MARKETED YOUR ARCING MACHINES in California between and during the years
18 1965 and 1971, inclusive.

19 Objection to Category No. 28:

20 Defendant objects to this request on the grounds that it is extremely vague,
21 ambiguous, unintelligible and calls for speculation as to what is being sought. Defendant
22 further objects to this request on the grounds that it is impermissibly overbroad in scope, and
23 seeks information and documents that are not reasonably calculated to lead to the discovery
24 of admissible evidence. Defendant further objects to this request to the extent it seeks
25 disclosure of information which is confidential business, proprietary or trade secret matter.

26 Category No. 29:

27 All WRITINGS PERTAINING TO or identifying distributors or other entities
28 who MARKETED YOUR ARCING MACHINES in Texas between and during the years

1 1977 and 1991, inclusive.

2 Objection to Category No. 29:

3 Defendant objects to this request on the grounds that it is extremely vague,
4 ambiguous, unintelligible and calls for speculation as to what is being sought. Defendant
5 further objects to this request on the grounds that it is impermissibly overbroad in scope, and
6 seeks information and documents that are not reasonably calculated to lead to the discovery
7 of admissible evidence. Defendant further objects to this request to the extent it seeks
8 disclosure of information which is confidential business, proprietary or trade secret matter.

9 Category No. 30:

10 All WRITINGS PERTAINING TO or identifying distributors or other entities
11 who MARKETED YOUR ARCING MACHINES in Ohio between and during the years 1971
12 and 1977, and 1980 to 1990, inclusive.

13 Objection to Category No. 30:

14 Defendant objects to this request on the grounds that it is extremely vague,
15 ambiguous, unintelligible and calls for speculation as to what is being sought. Defendant
16 further objects to this request on the grounds that it is impermissibly overbroad in scope, and
17 seeks information and documents that are not reasonably calculated to lead to the discovery
18 of admissible evidence. Defendant further objects to this request to the extent it seeks
19 disclosure of information which is confidential business, proprietary or trade secret matter.

20 OBJECTIONS TO PERSON(S) MOST KNOWLEDGEABLE

21 Category No. 1:

22 All information PERTAINING TO YOUR document retention policy.

23 Objection to Category No. 1:

24 Defendant objects on the ground that the request is overbroad, burdensome and
25 oppressive. Defendant objects on the grounds that this request is harassing and not
26 reasonably calculated to lead to the discovery of admissible evidence. The request is also
27 vague and ambiguous as to the term "document retention policy." Defendant objects to this
28 request on the grounds that the request seeks information regarding the rights of third persons

1 who are not party to this litigation. Defendant also objects on the grounds that the request is
2 vague, ambiguous, compound and complex.

3 Category No. 2:

4 All information PERTAINING TO YOUR corporate history and structure,
5 including the identities of any and all of YOUR predecessors in interest.

6 Objection to Category No. 2:

7 Defendant objects on the ground that the request is overbroad, burdensome and
8 oppressive. Defendant objects on the grounds that this request is harassing and not
9 reasonably calculated to lead to the discovery of admissible evidence. Defendant further
10 objects to this request on the grounds that it seeks information regarding the rights of third
11 persons who are not party to this litigation. Defendant also objects on the grounds that the
12 request is vague, ambiguous, compound and complex.

13 Category No. 3:

14 All information PERTAINING TO any and all sales of ARCING MACHINES
15 by YOU to the jobsites or companies identified on the attached Exhibit "A" between 1965
16 and 1991, inclusive.

17 Objection to Category No. 3:

18 Defendant objects on the ground that the request is overbroad, burdensome and
19 oppressive. Defendant objects on the grounds that this request is harassing and not
20 reasonably calculated to lead to the discovery of admissible evidence. Defendant objects to
21 this request on the grounds that the request seeks information regarding the rights of third
22 persons who are not party to this litigation.

23 Category No. 4:

24 All information PERTAINING TO or identifying YOUR distributors of any
25 and all ARCING MACHINES MARKETING by YOU to the jobsites or companies identified
26 on the attached Exhibit "A" between 1965 and 1991, inclusive.

27 Objection to Category No. 4:

28 Defendant objects on the ground that the request is overbroad, burdensome and

1 oppressive. Defendant objects on the grounds that this request is harassing and not
2 reasonably calculated to lead to the discovery of admissible evidence. Defendant objects to
3 this request on the grounds that the request seeks information regarding the rights of third
4 persons who are not party to this litigation.

5 Category No. 5:

6 All information PERTAINING TO or identifying the manufacturer name,
7 brand name, trade name and/or model number of any and all ARCING MACHINES
8 MARKETED by YOU to the jobsites or companies identified on the attached Exhibit "A"
9 between 1965 and 1991, inclusive.

10 Objection to Category No. 5:

11 Defendant objects to this request on the grounds that it is extremely vague,
12 ambiguous, unintelligible and calls for speculation as to what is being sought. Defendant
13 further objects to this request on the grounds that it is impermissibly overbroad in scope, and
14 seeks information and documents that are not reasonably calculated to lead to the discovery
15 of admissible evidence.

16 Category No. 6:

17 All information PERTAINING TO any photographs, brochures, product
18 catalogs, advertisements, product data sheets, product safety sheets, flyers, and any other
19 WRITINGS in YOUR possession, custody or control PERTAINING TO any and all
20 ARCING MACHINES MARKETED by YOU to the jobsites or companies identified on the
21 attached Exhibit "A" between 1965 and 1991, inclusive.

22 Objection to Category No. 6:

23 Defendant objects on the grounds that the request is overbroad, vague and
24 ambiguous. Defendant also objects to this request to the extent that it seeks disclosure of
25 information which is confidential business, proprietary or trade secret matter. Defendant
26 further objects on the grounds that this request is harassing and not reasonably calculated to
27 lead to the discovery of admissible evidence.

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1 Category No. 7:

2 All information PERTAINING TO any labels, logos, pictures, drawings, and
3 any other WRITINGS in YOUR possession, custody or control, located on any box, carton
4 or other packaging, or any instructions or other materials included with any and all ARCING
5 MACHINES MARKETING by YOU in the states identified on the attached Exhibit "A"
6 between 1965 and 1991, inclusive.

7 Objection to Category No. 7:

8 Defendant objects to this request on the grounds that it is extremely vague,
9 ambiguous, unintelligible and calls for speculation as to what is being sought. Defendant
10 further objects to this request on the grounds that it is impermissibly overbroad in scope, and
11 seeks information and documents that are not reasonably calculated to lead to the discovery
12 of admissible evidence.

13 Category No. 8:

14 All information PERTAINING TO any samples or exemplars of boxes, cartons
15 or other packaging or any instructions or other materials included with any and all ARCING
16 MACHINES MARKETING by YOU in the states identified on the attached Exhibit "A"
17 between 1965 and 1991, inclusive.

18 Objection to Category No. 8:

19 Defendant objects to this request on the grounds that it is extremely vague,
20 ambiguous, unintelligible and calls for speculation as to what is being sought. Defendant
21 further objects to this request on the grounds that it is impermissibly overbroad in scope, and
22 seeks information and documents that are not reasonably calculated to lead to the discovery
23 of admissible evidence.

24 Category No. 9:

25 All information identifying the manufacturers' suggested uses or applications
26 of ARCING MACHINES MARKETING by YOU to the jobsites or companies identified on
27 the attached Exhibit "A" between 1965 and 1991, inclusive.

28 ///

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1 Objection to Category No. 9:

2 Defendant objects to this request on the grounds that it is extremely vague,
3 ambiguous, unintelligible and calls for speculation as to what is being sought. Defendant
4 further objects to this request on the grounds that it is impermissibly overbroad in scope, and
5 seeks information and documents that are not reasonably calculated to lead to the discovery
6 of admissible evidence.

7 Category No. 10:

8 All information submitted, received or exchanged by YOU with the United
9 States Federal Trade Commission PERTAINING TO ARCING MACHINES manufactured,
10 sold, distributed or MARKETING by YOU between 1965-1991, inclusive; including, but not
11 limited to, all sales figures or data submitted or received by YOU.

12 Objection to Category No. 10:

13 Defendant objects to this request on the grounds that it is extremely vague,
14 ambiguous, unintelligible and calls for speculation as to what is being sought. Defendant
15 further objects to this request on the grounds that it is impermissibly overbroad in scope, and
16 seeks information and documents that are not reasonably calculated to lead to the discovery
17 of admissible evidence. Defendant further objects to this request to the extent that it seeks
18 disclosure of information which is confidential business, proprietary or trade secret matter.

19 Category No. 11:

20 All information submitted, received or exchanged by YOU to any automotive
21 parts catalog, including, but not limited to, the Sweets Catalog, PERTAINING TO or
22 identifying the manufacture name, brand name, trade name and/or model number of any an
23 all ARCING MACHINES MARKETING by YOU between 1965-1991, inclusive.

24 Objection to Category No. 11:

25 Defendant objects to this request on the grounds that it is extremely vague,
26 ambiguous, unintelligible and calls for speculation as to what is being sought. Defendant
27 further objects to this request on the grounds that it is impermissibly overbroad in scope, and
28 seeks information and documents that are not reasonably calculated to lead to the discovery

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1 of admissible evidence. Defendant further objects to this request to the extent that it seeks
2 disclosure of information which is confidential business, proprietary or trade secret matter.

3 Category No. 12:

4 All information PERTAINING TO YOUR membership, association,
5 involvement correspondence or exchange of information with the Brake Linings
6 Manufacturers Association between 1949-1950, inclusive.

7 Objection to Category No. 12:

8 Defendant objects to this request on the grounds that it is extremely vague,
9 ambiguous, unintelligible and calls for speculation as to what is being sought. Defendant
10 further objects to this request on the grounds that it is impermissibly overbroad in scope, and
11 seeks information and documents that are not reasonably calculated to lead to the discovery
12 of admissible evidence. Defendant further objects to this request to the extent that it seeks
13 disclosure of information which is confidential business, proprietary or trade secret matter.

14 Category No. 13:

15 All information PERTAINING TO YOUR membership, association,
16 involvement, correspondence or exchange of information with the Clutch Facing and Brake
17 Linings Standards Institute between 1949-1950, inclusive.

18 Objection to Category No. 13:

19 Defendant objects to this request on the grounds that it is extremely vague,
20 ambiguous, unintelligible and calls for speculation as to what is being sought. Defendant
21 further objects to this request on the grounds that it is impermissibly overbroad in scope, and
22 seeks information and documents that are not reasonably calculated to lead to the discovery
23 of admissible evidence. Defendant further objects to this request to the extent that it seeks
24 disclosure of information which is confidential business, proprietary or trade secret matter.

25 Category No. 14:

26 All information PERTAINING TO YOUR membership, association,
27 involvement, correspondence or exchange of information with the Friction Materials
28 Standards Institute between 1950-1991, inclusive.

1 Objection to Category No. 14:

2 Defendant objects to this request on the grounds that it is extremely vague,
3 ambiguous, unintelligible and calls for speculation as to what is being sought. Defendant
4 further objects to this request on the grounds that it is impermissibly overbroad in scope, and
5 seeks information and documents that are not reasonably calculated to lead to the discovery
6 of admissible evidence. Defendant further objects to this request to the extent that it seeks
7 disclosure of information which is confidential business, proprietary or trade secret matter.

8 Category No. 15:

9 All information PERTAINING TO YOUR membership, association,
10 involvement correspondence or exchange of information with the Industrial Hygiene
11 Foundation.

12 Objection to Category No. 15:

13 Defendant objects to this request on the grounds that it is extremely vague,
14 ambiguous, unintelligible and calls for speculation as to what is being sought. Defendant
15 further objects to this request on the grounds that it is impermissibly overbroad in scope, and
16 seeks information and documents that are not reasonably calculated to lead to the discovery
17 of admissible evidence. Defendant further objects to this request to the extent that it seeks
18 disclosure of information which is confidential business, proprietary or trade secret matter.

19 Category No. 16:

20 All information PERTAINING TO the date on which YOU first became aware
21 that there were health risks associated with exposure to ACP or ASBESTOS.

22 Objection to Category No. 16:

23 Defendant objects on the grounds that the request is overbroad, vague and
24 ambiguous. Defendant objects to this request on the grounds that the request seeks
25 information regarding the rights of third persons who are not party to this litigation.
26 Defendant also objects to this request as not reasonably calculated to lead to the discovery of
27 admissible evidence, and improper under Civil Code §3295, as plaintiff is apparently
28 pursuing claims heard on the Consumer Expectation Theory.

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1 Category No. 17:

2 All information PERTAINING TO the date on which YOU first placed any
3 warnings on ARCING MACHINES boxes, cartons, other packaging, warning or instruction
4 manuals, or any other writings accompanying YOUR ARCING MACHINES, concerning the
5 health hazards associated with the use, work with or handling of ACP or ASBESTOS.

6 Objection to Category No. 17:

7 Defendant objects to this request on the grounds that it is extremely vague,
8 ambiguous, unintelligible and calls for speculation as to what is being sought. Defendant
9 further objects to this request on the grounds that it is impermissibly overbroad in scope, and
10 seeks information and documents that are not reasonably calculated to lead to the discovery
11 of admissible evidence. Defendant further objects to this request to the extent it seeks
12 disclosure of information which is confidential business, proprietary or trade secret matter.

13 Category No. 18:

14 All information PERTAINING TO any samples or exemplars, of any and all
15 warnings of ASBESTOS-related health hazards placed on any and all boxes, cartons, other
16 packaging, warning or instruction manuals, or any other writings accompanying any and all
17 ARCING MACHINES MARKETING by YOU between 1965-1991, inclusive.

18 Objection to Category No. 18:

19 Defendant objects to this request on the grounds that it is extremely vague,
20 ambiguous, unintelligible and calls for speculation as to what is being sought. Defendant
21 further objects to this request on the grounds that it is impermissibly overbroad in scope, and
22 seeks information and documents that are not reasonably calculated to lead to the discovery
23 of admissible evidence.

24 Category No. 19:

25 All information PERTAINING TO any warnings of ASBESTOS-related health
26 hazards published, issued, distributed or otherwise communicated by YOU to users and
27 consumers of ARCING MACHINES MARKETING by YOU.

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1 Objection to Category No. 19:

2 Defendant objects to this request on the grounds that it is extremely vague,
3 ambiguous, unintelligible and calls for speculation as to what is being sought. Defendant
4 further objects to this request on the grounds that it is impermissibly overbroad in scope, and
5 seeks information and documents that are not reasonably calculated to lead to the discovery
6 of admissible evidence. Defendant further objects to this request to the extent it seeks
7 disclosure of information which is confidential business, proprietary or trade secret matter.

8 Category No. 20:

9 All information PERTAINING TO or describing what actions YOU took, if
10 any, regarding YOUR existing inventories of ARCING MACHINES subsequent to the date
11 YOU first became aware that there were health risks associated with exposure to ACP or
12 ASBESTOS.

13 Objection to Category No. 20:

14 Defendant objects to this request on the grounds that it is extremely vague,
15 ambiguous, unintelligible and calls for speculation as to what is being sought. Defendant
16 further objects to this request on the grounds that it is impermissibly overbroad in scope,
17 seeks information and documents that are neither relevant to the subject matter of this action,
18 nor reasonably calculated to lead to the discovery of admissible evidence, and it is
19 burdensome, harassing and oppressive. Defendant also objects to this request to the extent
20 that it seeks disclosure of information which is confidential business, proprietary or trade
21 secret matter.

22 Category No. 21:

23 All information PERTAINING TO the results of any and all studies performed
24 by consultants hired by YOU concerning the health hazards associated with exposure to ACP
25 or ASBESTOS.

26 Objection to Category No. 21:

27 Defendant objects to this request on the grounds that it is extremely vague,
ambiguous, unintelligible and calls for speculation as to what is being sought. Defendant

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1 further objects to this request on the grounds that it is impermissibly overbroad in scope, and
2 seeks information and documents that are not reasonably calculated to lead to the discovery
3 of admissible evidence. Defendant further objects to this request to the extent it seeks
4 disclosure of information which is confidential business, proprietary or trade secret matter.

5 Category No. 22:

6 All information PERTAINING TO any communication (written or oral) by
7 YOU to YOUR employees or others regarding the health hazards of exposure to ACP or
8 ASBESTOS.

9 Objection to Category No. 22:

10 Defendant objects to this request on the grounds that it is extremely vague,
11 ambiguous, unintelligible and calls for speculation as to what is being sought. Defendant
12 further objects to this request on the grounds that it is impermissibly overbroad in scope, and
13 seeks information and documents that are not reasonably calculated to lead to the discovery
14 of admissible evidence.

15 Category No. 23:

16 All information which identifies the individuals employed by YOU who were
17 responsible for the purchase or acquisition of components parts used for the manufacture,
18 fabrication, assembly, or other production of YOUR ARCING MACHINES during the years
19 1965 to 1991, inclusive.

20 Objection to Category No. 23:

21 Defendant objects to this request on the grounds that it is extremely vague,
22 ambiguous, unintelligible and calls for speculation as to what is being sought. Defendant
23 further objects to this request on the grounds that it is impermissibly overbroad in scope, and
24 seeks information and documents that are not reasonably calculated to lead to the discovery
25 of admissible evidence. Defendant also objects to the request on the grounds that it is
26 invasive of third-party privacy rights and plaintiffs have failed to properly notice the
27 deposition pursuant to Code of Civil Procedure sections 1985.3, 1985.6 and 2025(f).

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1 Category No. 24:

2 All information which identifies the individuals employed by YOU who were
3 responsible for the manufacture, fabrication, assembly, or other production of ARCING
4 MACHINES by YOU during the years 1965 to 1991, inclusive.

5 Objection to Category No. 24:

6 Defendant objects to this request on the grounds that it is extremely vague,
7 ambiguous, unintelligible and calls for speculation as to what is being sought. Defendant
8 further objects to this request on the grounds that it is impermissibly overbroad in scope, and
9 seeks information and documents that are not reasonably calculated to lead to the discovery
10 of admissible evidence. Defendant also objects to the request on the grounds that it is
11 invasive of third-party privacy rights and plaintiffs have failed to properly notice the
12 deposition pursuant to Code of Civil Procedure sections 1985.3, 1985.6 and 2025(f).

13 Category No. 25:

14 All information which identifies the individuals employed by YOU who were
15 responsible for the sale, supply, MARKETING, or distribution of ARCING MACHINES by
16 YOU during the years 1965 to 1991, inclusive.

17 Objection to Category No. 25:

18 Defendant objects to this request on the grounds that it is extremely vague,
19 ambiguous, unintelligible and calls for speculation as to what is being sought. Defendant
20 further objects to this request on the grounds that it is impermissibly overbroad in scope, and
21 seeks information and documents that are not reasonably calculated to lead to the discovery
22 of admissible evidence. Defendant also objects to the request on the grounds that it is
23 invasive of third-party privacy rights and plaintiffs have failed to properly notice the
24 deposition pursuant to Code of Civil Procedure sections 1985.3, 1985.6 and 2025(f).

25 Category No. 26:

26 All information regarding the EARLIEST Worker's Compensation claims filed
27 against YOU in which it was alleged that claimant suffered injuries resulting from asbestos
28 exposure. (For purposes of this demand, "EARLIEST" shall refer to the first five years

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1 during which such claims were filed against you.)

2 Objection to Category No. 26:

3 Defendant objects to this request on the grounds that it is extremely vague,
4 ambiguous, unintelligible and calls for speculation as to what is being sought. Defendant
5 further objects to this request on the grounds that it is impermissibly overbroad in scope, and
6 seeks information and documents that are not reasonably calculated to lead to the discovery
7 of admissible evidence. Defendant also objects to the request on the grounds that it is
8 invasive of third-party privacy rights and plaintiffs have failed to properly notice the
9 deposition pursuant to Code of Civil Procedure sections 1985.3, 1985.6 and 2025(f).

10 Category No. 27:

11 All information regarding the EARLIEST personal injury claims filed against
12 YOU in which it was alleged that claimant suffered injuries resulting from asbestos exposure.
13 (For purposes of this demand, "EARLIEST" shall refer to the first five years during which
14 such claims were filed against you.)

15 Objection to Category No. 27:

16 Defendant objects to this request on the grounds that it is extremely vague,
17 ambiguous, unintelligible and calls for speculation as to what is being sought. Defendant
18 further objects to this request on the grounds that it is impermissibly overbroad in scope, and
19 seeks information and documents that are not reasonably calculated to lead to the discovery
20 of admissible evidence. Defendant also objects to the request on the grounds that it is
21 invasive of third-party privacy rights and plaintiffs have failed to properly notice the
22 deposition pursuant to Code of Civil Procedure sections 1985.3, 1985.6 and 2025(f).

23 Category No. 28:

24 All information PERTAINING TO or identifying distributors or other entities
25 who MARKETING YOUR ARCING MACHINES in California between and during the years
26 1965 and 1971, inclusive.

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1 Objection to Category No. 28:

2 Defendant objects to this request on the grounds that it is extremely vague,
3 ambiguous, unintelligible and calls for speculation as to what is being sought. Defendant
4 further objects to this request on the grounds that it is impermissibly overbroad in scope, and
5 seeks information and documents that are not reasonably calculated to lead to the discovery
6 of admissible evidence. Defendant further objects to this request to the extent it seeks
7 disclosure of information which is confidential business, proprietary or trade secret matter.

8 Category No. 29:

9 All information PERTAINING TO or identifying distributors or other entities
10 who MARKETED YOUR ARCING MACHINES in Texas between and during the years
11 1977 and 1991, inclusive.

12 Objection to Category No. 29:

13 Defendant objects to this request on the grounds that it is extremely vague,
14 ambiguous, unintelligible and calls for speculation as to what is being sought. Defendant
15 further objects to this request on the grounds that it is impermissibly overbroad in scope, and
16 seeks information and documents that are not reasonably calculated to lead to the discovery
17 of admissible evidence. Defendant further objects to this request to the extent it seeks
18 disclosure of information which is confidential business, proprietary or trade secret matter.

19 Category No. 30:

20 All information PERTAINING TO or identifying distributors or other entities
21 who MARKETED YOUR ARCING MACHINES in Ohio between and during the years 1971
22 and 1977, and 1980 to 1990, inclusive.

23 Objection to Category No. 30:

24 Defendant objects to this request on the grounds that it is extremely vague,
25 ambiguous, unintelligible and calls for speculation as to what is being sought. Defendant
26 further objects to this request on the grounds that it is impermissibly overbroad in scope, and
27 seeks information and documents that are not reasonably calculated to lead to the discovery
28 of admissible evidence. Defendant further objects to this request to the extent it seeks

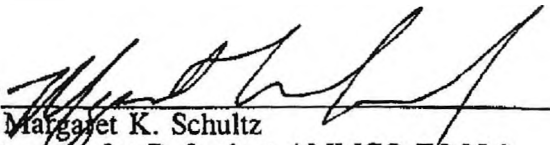
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1 disclosure of information which is confidential business, proprietary or trade secret matter.

2 Dated: October 25, 1999

SEDGWICK, DETERT, MORAN & ARNOLD

3
4 By 

Margaret K. Schultz
Attorneys for Defendant AMMCO TOOLS,
INC., sued herein as HENNESSY
INDUSTRIES

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1 **PROOF OF SERVICE**

2 I am a resident of the State of California, over the age of eighteen years, and not a
3 party to the within action. My business address is Sedgwick, Detert, Moran & Arnold, One
4 Embarcadero Center, 16th Floor, San Francisco, California 94111-3628. On October 25, 1999,
5 I served the within documents: **AMMCO TOOLS, INC.'S OBJECTIONS TO
6 PLAINTIFF'S NOTICE OF TAKING DEPOSITION OF HENNESSY'S PERSON MOST
7 KNOWLEDGEABLE AND CUSTODIAN OF RECORDS**

8 ☐

9 by transmitting via facsimile the document(s) listed above to the fax number(s)
10 set forth below on this date before 5:00 p.m.

11 ☒

12 by placing the document(s) listed above in a sealed envelope with postage thereon
13 fully prepaid, in the United States mail at San Francisco, California addressed as
14 set forth below.

15 ☐

16 by causing personal delivery by _____ of the document(s) listed above to
17 the person(s) at the address(es) set forth below.

18 ☐

19 by personally delivering the document(s) listed above to the person(s) at the
20 address(es) set forth below.

21 ☐

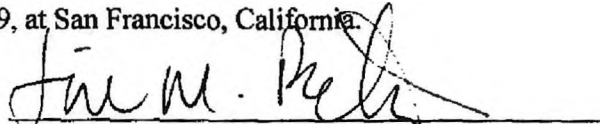
22 by overnight courier of the document(s) listed above to the person(s) at the
23 address(es) set forth below.

24 BRAYTON, PURCELL, CURTIS & GEAGAN
25 222 Rush Landin
26 P. O. Box 2109
27 Novato, Ca 94945-3229

28 I am readily familiar with the firm's practice of collection and processing
correspondence for mailing. Under that practice it would be deposited with the U.S. Postal
Service on that same day with postage thereon fully prepaid in the ordinary course of business. I
am aware that on motion of the party served, service is presumed invalid if postal cancellation
date or postage meter date is more than one day after date of deposit for mailing in affidavit.

I declare under penalty of perjury under the laws of the State of California that the
above is true and correct.

Executed on October 25, 1999, at San Francisco, California.


LIN M. PETRO

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