

CAUSE NO. 2004-03964

IN RE: MDL ASBESTOS LITIGATION
All Waters & Kraus Cases

§ IN THE DISTRICT COURT OF
§
§
§
§ HARRIS COUNTY, TEXAS
§
§
§
§ 11th JUDICIAL DISTRICT

RESPONSE TO DEPOSITION BY WRITTEN QUESTIONS

1. Please state your full name.

ANSWER: Daniel B. May.

2. Please state by whom you are employed and the business address.

ANSWER: I am employed by MetLife Group, and work at 1 MetLife Plaza, 27-01
Queens Plaza North, Long Island City, NY 11101.

3. What is the title of your position or job?

ANSWER: Archivist.

4. Please review Exhibit A attached hereto. Is the original of the memoranda, reports, records and/or data compilations attached as Exhibit A in your custody or subject to your control, supervision or direction?

ANSWER: This questions seeks information regarding a document written in 1935 that relates to events that occurred more than 70 years ago. Many of the Metropolitan Life employees who may have been involved in or may have had knowledge of this document and related events are deceased or are no longer employed by Metropolitan Life.

