7. Asbestos/Distributor

Has Defendant at any time, engaged in the marketing and/or sale of any asbestos containing product, which generic product type has been previously identified in exposure sheets in this circuit, manufactured in whole or in part by an unrelated business entity? If so, please state:

A. The name and address of the unrelated business entity;

B. The product's trade and/or brand name;

C. The years during which such activity took place;

D. Identify the organizational unit of Defendant, or the associated business entity so engaged.

E. Within the United States was there any geographic limitation which you claim was applicable to each distributor and/or wholesaler (Yes or No)?

If Yes state the geographical area which you claim was applicable to each distributor and/or wholesaler; and,

F. Whether there was a written distributorship agreement;

G. Whether the distributorship was exclusive;

H. Identify all documents pertaining to the distributor or wholesaler relationship and the custodian thereof;

I. The ratio of sales to distributors compared to direct sales to consumers.

J. List of sales records or shipments to each distributor or wholesaler.