

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF NEW YORK

IN RE: NORTHERN DISTRICT ASBESTOS
LITIGATION

NDAL RESPONSES TO
PLAINTIFFS' FIRST
STANDARD SET OF
LIABILITY INTERROGATORIES

This Document Applies to All Cases

The defendant, Eagle-Picher Industries, Inc., by its attorneys, BOUVIER, O'CONNOR, as and for their responses to plaintiffs' Interrogatories, incorporates this Preliminary Statement and General Objections:

PRELIMINARY STATEMENT AND GENERAL OBJECTIONS

Information provided herein, except where indicated for Eagle-Picher, is with respect only to the Fibers Department of the Chemicals and Fibers Division of Eagle-Picher Industries, Inc. ("Eagle-Picher"), which department was sold on December 31, 1982, and which is hereinafter referred to as the "Company", since it is the only unit of defendant which ever produced or sold industrial insulation with which the plaintiffs may have come into contact.

1. Eagle-Picher objects to Plaintiffs' First Standard Set of Liability Interrogatories and Document Requests because they are overly broad, unduly burdensome and oppressive, because