

expensive, harassing, and annoying. Objection the question seeks irrelevant information and information protected by the work product exemption. Objection the Interrogatory exceeds the scope of permissible discovery pursuant to T.R.C.P. 166b. Subject to the foregoing objections, Defendant reserves the right to supplement this answer, subject to all objections now raised or that can be raised if information later becomes available. Defendant incorporates herein by reference Defendant's List of Potential Witnesses, Designation of Deposition Testimony, and Designation of Expert Witnesses (which includes all supplemental designations), all filed or to be filed in this case.

INTERROGATORY NO. 62:

Please identify documents which will be used at time of trial, (Exhibit List, Deposition List), which are relevant to each of Defendant's enumerated defenses in Defendant's last filed Answer.

ANSWER:

See Preliminary Statement and General Objections, which are incorporated herein as if fully rewritten. Objection this interrogatory is overly broad, vague, ambiguous, unduly burdensome, unnecessarily expensive, harassing, and annoying. Objection the question seeks information protected by the work product, witness statements, party communications, and expert exemptions of T.R.C.P. 166b and the attorney-client privilege of T.R.C.E. 503. Subject to and without waiving the foregoing objections, Defendant incorporates herein by reference Defendant's Designation of Exhibits, Deposition Testimony, Potential Fact Witnesses and Expert Witnesses (including all supplemental designations) filed or to be filed in this case. Defendant incorporates herein by reference all responses to discovery served by all Plaintiffs in this case. Defendant expressly reserves the right to use all documents covered by all authorizations and releases Defendant(s) has/have requested Plaintiff(s) to provide to Defendant(s). Defendant expressly reserves the right to use all documents filed, designated or relied upon by other Defendants or by Plaintiffs in this case.

INTERROGATORY NO. 63:

When, if ever, did Defendant or any of its predecessors-in-interest first receive a copy of the article entitled "A Health Survey of Pipe Covering Operations in Constructing Naval Vessels", published in January, 1946 in the Journal of Industrial Hygiene & Toxicology, and authored by W. Fleischer and P. Drinker, et al ("the Fleischer-Drinker Report")?

- (a) Identify the name and position of the employee or officer who received same;
- (b) Please produce all documents generated by Defendant which discuss or in any way reference the "Fleischer-Drinker" study prior to 1968;