

1 defendant's asbestos-containing mechanical parts for the years
2 1930 to 1972.

3 RESPONSE:

4 Based upon information available at this time, defendant
5 responds that it does not believe so.

6 INTERROGATORY NO. 110:

7 Please list the names and addresses of all insurance carri-
8 ers which provided Workers' Compensation coverage for occupa-
9 tional diseases for defendant's employees, including automobile
10 repair employees, between the years of 1930 and 1972.

11 RESPONSE:

12 OBJECTION. Interrogatory No. 110 is objected to on the
13 grounds that it is overly broad, burdensome and oppressive. The
14 burden and expense to this defendant to compile the information
15 sought is not outweighed by the questionable probative value of
16 the information sought. The information requested is not rele-
17 vant and not reasonably calculated to lead to the discovery of
18 admissible evidence.

19 INTERROGATORY NO. 111:

20 At any time during the period 1948 to 1978, has defendant
21 manufactured automobile undercoat sealer? If so, please state:

22 (a) The trade or brand name(s) under which the
23 undercoat sealer was marketed;

24 (b) The years during which the undercoat sealer, under
25 each trade or brand name, was manufactured;

26 (c) The dates each product listed in (a) was withdrawn
27 from the market;

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