

34. Warning/Insert

Has Defendant ever placed any form of package insert or informative brochure in a container of an asbestos-containing product, listed in response to interrogatory 14, explaining the hazards of asbestos? If so, state as to each such insert or brochure:

- A. When was it first placed in containers and for what years thereafter;
- B. What products had the insert or brochure included;
- C. Describe the size, shape, color and text of the insert or brochure;
- D. Identify all persons involved in the decision to include the insert or brochure; and,
- E. Identify all company officers and/or committees who participated in the decision to include an insert or brochure, and in particular, identify the prime decision-maker, if any; and
- F. Identify the insert and/or brochure itself and the custodian thereof.

RESPONSE TO MASTER INTERROGATORY 34:

See Preliminary Statement and General Objections. Subject to and without waiving objections, see also response to Interrogatory 33.