

operations known as Truck Components Operations.

2. Manufacturing Inquiries Are Irrelevant. Eaton further objects to every discovery request that concerns the manufacture of asbestos or asbestos-containing products because they do not apply to Eaton. Many of the discovery requests appear to be directed to a manufacturer of asbestos or an asbestos-containing product, which Eaton is not. Eaton has never mined asbestos, processed raw asbestos, nor manufactured asbestos or the asbestos-containing component of any automotive friction product. Eaton did not develop, process, design, manufacture, or produce asbestos or asbestos-containing products; thus Eaton has no information related to the design, development, processing or production of another manufacturer's products. Rather, Eaton's limited knowledge pertains to the production of transmissions, axles and brake assemblies, which, at times, incorporated asbestos-containing products manufactured by companies unrelated to Eaton. Industrial information about Eaton's manufacture of transmissions, brake and axle assemblies is not relevant to plaintiffs' claims since plaintiffs' decedent was not involved in this industrial manufacturing process.

3. Information From Third Parties. Eaton objects to these discovery requests to the extent that they seek information from or regarding third parties. These responses are limited to Eaton's knowledge about Eaton's own activities.

4. Overly Broad, Undue Burden - Lack of Records. Eaton objects that these discovery requests are overly broad, burdensome and oppressive to the extent they purport to require a search for voluminous historical records, to the extent they exist, that only tangentially relate to plaintiffs' claims, if at all. Moreover, such documents that might arguably pertain to these Requests have been lost or discarded in the normal course of business over the last several decades and are unavailable to Eaton to assist in responding to these discovery requests. In addition, before the time plaintiffs served Eaton in this action, Eaton divested the part of its business that was historically involved with the manufacture of axle and brake assemblies. Most if not all of the personnel who might have knowledge of historical business records related to brake products have either passed away or are no longer working for Eaton. In responding to these Requests, Eaton will provide good faith answers based on its continuing investigation of the documents and other information reasonably available to it.

5. Compilation or Speculation. Eaton further objects to the extent these discovery requests would require Eaton to engage in unjustly burdensome activities to extract, compile or develop information from historical documents to determine the answers to plaintiffs' Requests, particularly in regard to matters that involve historical records that are decades old and which are incomplete and sporadic, at best. Eaton objects to the extent that these Requests purport to require Eaton to guess, speculate, or conjecture about the meaning of documents or inferences that might be drawn there from.

6. Overly Broad - Geographic Scope. Eaton objects that the Requests as a whole are overbroad, burdensome and oppressive in relation to their geographic scope and that plaintiffs have not articulated claims or adduced any evidence to justify such oppressive discovery.

7. Not Likely to Lead To Admissible Evidence - Unrelated Businesses. Eaton