during 1965-2005:

(a) Identify by type, manufacture name, brand name, trade name, make, model, number and/or like designation each and every asbestos-containing product present at said site during the time of exposure, which was manufactured, sold, distributed, installed, applied and/or specified by Defendant and/or any predecessor /related entity; OR,

(b) State specifically that Defendant denies that asbestos-containing products attributable to it or any predecessor / related entity were present at said site during the relevant time; OR,

(c) State that Defendant lacks sufficient information to identify any asbestos-containing products or to specifically deny that any such products were present.

ANSWER:

Answering defendant acknowledges that certain Gleason machines were at the Ford site in question. Specifically, Gleason Model No. 116s and 950s and PHOENIX® machines were at the plant in question. By way of further response, answering defendant states that some of the machines may have contained some asbestos containing parts at the time of original manufacture, such as brake assemblies. However, Gleason PHOENIX® machines did not contain any asbestos parts.

INTERROGATORY NO. 3:

With respect to each site as described in Interrogatory No. 2:

(a) State whether or not any agent, employee or representative of Defendant and/or any predecessor/related entity and/or of any affiliated distributor thereof was ever present at said site during or prior to the time that plaintiff/decedent was present for any purpose, including, but not limited to, repair, servicing, sales, installation, training, and/or technical support. If your answer is "yes" identify each and every such occasion as follows:

(i) state the date and location of the visit;
(ii) identify the person(s) (agents, employees, representatives) involved; and,
(iii) state the purpose of the visit (e.g. sales call, technical support, repair etc.); and,