

ANSWER:

OBJECTION. Overbroad, vague. Without waiving this objection, Eaton states that it is aware that such studies have been performed by third parties unrelated to Eaton. As far as Eaton's involvement with any such studies, Eaton incorporates herein its response to Interrogatory No. 52.

INTERROGATORY NO. 55

State whether any employee of defendant, past or present, ever made a claim for asbestos-related pleural disease, asbestosis, mesothelioma, lung cancer or any other cancer under the Occupational Disease or Workmen's Compensation with any State. If so, discuss:

- a. The date that defendant first received notice of such claim;
- b.
- c. The total number of such claims per year received to date;
- d. The total number of such claims received to date;
- e. The number of such claims for which disability benefits and/or medical expenses were paid by defendant;
- e. All persons to whom disability benefits and/or medical expenses were your defendant and the exact medical diagnosis, disease and/or condition for which such benefits/expenses were paid.

ANSWER:

Based on the information currently available to Eaton, no.

INTERROGATORY NO. 56

Whether you or any of your predecessors and/or subsidiaries maintain, from 1950 through the present or for any portion thereof, copies of invoices, shipping documents, bills of lading, purchase orders, or other documents of a similar nature relating to the purchase, manufacture, marketing, sale or distribution of asbestos products including but not limited to