

Cooper was a party at the time) in any case alleging exposure to asbestos and/or asbestos-containing products / materials, reflecting testimony by:

- (a) Any and all lay witnesses;
- (b) Any and all independent expert witnesses;
- (c) Any and/all controlled expert witnesses;
and/or
- (d) Any and all other persons possessing knowledge and/or information concerning the facts of this case.

N/A.

7. Any and all documents referring to, relating to, and/or reflecting any and/or all of the plaintiff(s)/decendent in this case.

N/A. By way of further response, answering defendant does not have any documents in its possession related to plaintiff that was not received from plaintiff's counsel.

8. Any and all documents and/or exhibits that will and/or might be used by you at trial and/or in any other proceeding in this case.

It is unknown at this time which documents and/or exhibits answering defendant intends to use at trial and/or any other proceeding in this case. Answering defendant reserves the right to supplement this response.

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