

documents are available for Plaintiffs' counsel's review at the offices of Cooper & Walinski in Toledo, Ohio.

REQUEST FOR PRODUCTION NO. 25:

Produce any and all Industrial Hygiene or Medical Library indices and all medical or industrial hygiene articles maintained by the Defendant with regard to asbestos or Defendant's asbestos-containing products.

RESPONSE:

See Preliminary Statement and General Objections, which are incorporated herein as if fully rewritten. Defendant's document repository contains many documents, including numerous catalogs, brochures, and sales literature that provide pictures, diagrams, and information concerning manufacturing and sales of thousands of products made and/or sold by Victor Products Division. These documents are available for Plaintiffs' counsel's review at the offices of Cooper & Walinski in Toledo, Ohio.

REQUEST FOR PRODUCTION NO. 26:

Produce any and all corporate memoranda regarding in-house safety programs dealing with asbestos or Defendant's asbestos-containing products.

RESPONSE:

See Preliminary Statement and General Objections, which are incorporated herein as if fully rewritten. Defendant's document repository contains many documents, including numerous catalogs, brochures, and sales literature that provide pictures, diagrams, and information concerning manufacturing and sales of thousands of products made and/or sold by Victor Products Division. These documents are available for Plaintiffs' counsel's review at the offices of Cooper & Walinski in Toledo, Ohio.