

**Ans. Joseph V. Morris, Attorney
1144 East Market Street
Akron, OH 44316**

2. State the full and complete legal name under which your company is now doing business and has done business at all times from the date when it began mining, processing, manufacturing and/or selling asbestos products and materials up until the present time. If your company is presently an unincorporated division of another corporation, please state the name of such corporation.

**Ans. The Goodyear Tire & Rubber Company
1144 East Market Street
Akron, OH 44316**

- 3(a). Please state in which state(s) of the United States or what foreign country your business is incorporated, and state your principal place of business.

**Ans. Incorporated in Ohio.
Principal place of business in Akron, OH**

- 3(b). Please state whether:

(a) Your company is or ever has been authorized to do business in Hawaii. If your company is no longer authorized to do business in Hawaii, please state the years when your company was authorized to do business in Hawaii.

(b) Your company does or has ever done business in Hawaii.

(c) Your products are or have ever been used in Hawaii.

Ans.

(a) Goodyear is authorized to do business in Hawaii.

(b) Goodyear does business in Hawaii.

(c) Products manufactured by Goodyear have been used in Hawaii.

4. Has this defendant ever acquired through purchase, reorganization or merger another corporation, company, or business which manufactured, sold, processed distributed or contracted to apply insulation products