FORM B: DEFENDANT INTERROGATORIES: To be answered by all defendant and third party defendant miners, manufacturers, suppliers and installers of asbestos or asbestos containing products in all cases where Johns-Manville defendants will answer a separate set of interrogatories.

Instructions

Group A: Questions need not be answered unless defendant has raised a jurisdictional defense in its answers and intends to press said defense in accordance with R. 4:6-3.

Group B: Questions in this group are not limited in time or scope.

Group C: Questions in this group have time limits imposed concerning the scope of the information sought. The time reference is two years before plaintiff's earliest employment as alleged in the complaint up to the date of termination as alleged in the complaint. Where the complaint names more than one plaintiff the time reference is two years before the earliest date of employment by any plaintiff and the latest date of termination as to any such plaintiff.

Where reference is made in the question to plaintiff's employer, defendant is instructed to refer to the complaint for an identification of plaintiff's employer.

Answers to interrogatories in this form shall be provided and served within 120 days of the date of demand.