

5. Defendant objects to each interrogatory and request for production in part thereof to the extent that it seeks to require answers or information, or require identification of documents, or impose obligations beyond those permitted by the applicable rules of Civil Procedure and local rules of court.

6. Defendant objects to each interrogatory and request for production in part thereof to the extent that it seeks information in a form different from that maintained by Defendant in the ordinary course of its business.

7. Defendant objects to each interrogatory and request for production in part thereof to the extent that it seeks information concerning or contained in documents which it objects to providing.

8. Defendant objects to each interrogatory and request for production in part thereof to the extent that it seeks to impose on Defendant a discovery obligation to respond for Defendants' businesses and entities not parties to this litigation.

9. Defendant objects to each interrogatory and request for production and part thereof as unreasonable, unduly burdensome, expensive, harassing, annoying, overly broad, vague, and ambiguous given the needs and parameters of this case. First, because Defendant is a company employing many people it would be practically impossible to inquire of all Defendants' officers, directors, employees, or partners about their individual knowledge. Second, the requests seek information about products which were never sold in Texas and about products which the plaintiffs never would have worked with or around and which the plaintiffs would never have been exposed. In this regard, the requests are not reasonably calculated to lead to the discovery of admissible evidence and are irrelevant. The following responses are limited to asbestos bearing products which could have reached the geographic areas of Texas, Alabama, Florida, Mississippi, Oregon, Washington, Georgia, Tennessee, Arkansas, and Virginia.

10. Defendant objects to each interrogatory and request for production or part thereof that seeks to determine the knowledge, familiarity, or awareness of defendant. It is not possible to state precisely if or when a corporation can be said to have such knowledge; that is a mixed question of fact and law. Defendant objects to imputing knowledge, familiarity or awareness of an employee or employees or agent or agents of defendant.

11. Defendant objects to each interrogatory and request for production unless Plaintiff identify a product injuring them for which Defendant is responsible.

12. Defendant objects to the definitions "Defendant", "You", "Your", "Your company", "Predecessors", "Subsidiaries" these definitions are overly broad, vague, ambiguous, unduly burdensome, harassing, annoying, unnecessarily expensive, and not reasonably calculated to lead to the discovery of admissible evidence.