

See Response to Request for Production No. 1, which is incorporated herein as if fully rewritten.

REQUEST FOR PRODUCTION NO. 6:

Please produce any warnings, safety instructions, cautionary language, or other descriptive device concerning the risk, dangers, and hazards of exposure to, or use of, asbestos or asbestos-containing products that were placed on, or included with, the asbestos-containing products that Defendants designed, manufactured, sold, or otherwise placed in the stream of commerce between 1968 and 1995.

RESPONSE:

See Response to Request for Production No. 1, which is incorporated herein as if fully rewritten.

REQUEST FOR PRODUCTION NO. 7:

Please produce all contracts, correspondence, designs, specifications, and photographs of, or pertaining to, the packaging and shipping of asbestos or asbestos-containing products that you designed, manufactured, sold, distributed, or otherwise placed in the stream of commerce between 1968 and 1995.

RESPONSE:

See Response to Request for Production No. 1, which is incorporated herein as if fully rewritten.

REQUEST FOR PRODUCTION NO. 8:

Please produce all documents containing any express representations or warranties made by Defendants regarding asbestos or asbestos-containing products Caterpillar designed, manufactured, sold or otherwise placed in the stream of commerce between 1968 and 1995.

RESPONSE:

See Response to Request for Production No. 1, which is incorporated herein as if fully rewritten.

REQUEST FOR PRODUCTION NO. 9:

Please produce all documents relating to the health, safety, and environmental and industrial hygiene, of the effects of exposure to asbestos and/or asbestos-containing products that you received from any trade organization of which you are or were a member and/or from any other defendants in this litigation and/or from any other source.

RESPONSE: