

- (d) List the locations(s) at which claimant was exposed to asbestos;
- (e) Identify each and every board, administrative body, commission or court which handled or reviewed said claim and state the state the style and cause number applicable to said claim before each such body;
- (f) Identify the disease alleged by claimant;
- (g) State the final disposition of the claim including any and all benefits paid, and the entity making such payments;
- (h) If different from the date on which the claim was filed, state the date on which defendant first had notice of the claim; and
- (i) Identify any and all documents referring to, relating to or reflecting said claim.

ANSWER:

Defendant objects to this interrogatory on the grounds that the Court directed that this interrogatory be redrafted, and it understands that plaintiffs have failed to do so. April 14, 2000 Order, ¶7. See Answer to Interrogatory No. 89, which is incorporated herein as if fully rewritten.

INTERROGATORY NO. 91:

How many past or present employees of Defendant, its predecessors or related companies are known by you [who claim] to be suffering from, to have suffered from, or to have suffered deaths caused by:

- (a) asbestosis?
- (b) lung cancer?
- (c) mesothelioma?

ANSWER: