

grounds that it is overly broad, vague, ambiguous and unintelligible and this responding defendant does not know to which "use" the plaintiff refers.

INTERROGATORY NO. 85:

Please state whether this defendant has distributed any catalogs, brochures, pamphlets or other advertising materials regarding its asbestos-containing products between 1930 and 1972.

RESPONSE:

Yes.

INTERROGATORY NO. 86:

Does defendant advertise its asbestos-containing products by any media whatsoever.

RESPONSE:

Yes.

INTERROGATORY NO. 87:

Please state whether defendant sold any asbestos-containing products to any United States governmental agency between 1930 to 1972. If so:

(a) List the name and address of each such agency;

(b) The dates of each sale;

(c) The final government destination of each product sold;

(d) The type and serial or model number of products sold or distributed to said agencies.

RESPONSE:

OBJECTION. Interrogatory No. 87 is objected to on the grounds set forth in response to Interrogatory No. 83, supra, and the same is incorporated herein as though fully set forth. Without