

**IN THE SUPERIOR COURT OF CLAYTON COUNTY
STATE OF GEORGIA**

CLYDE STANLEY PHILLIPS,
individually and in his capacity as
Executor of the Estate of CHRISTINNA
PHILLIPS, Deceased,

Plaintiff,

v.

GEORGIA-PACIFIC LLC, et al.,

Defendants.

CIVIL ACTION FILE

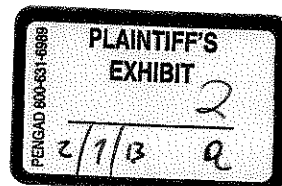
NO. 2012CV00804-5

**RESPONSES AND OBJECTIONS BY HONEYWELL
INTERNATIONAL INC. TO PLAINTIFF'S THIRD AMENDED
NOTICE TO TAKE RULE 30(B)(6) VIDEO DEPOSITION AND
NOTICE TO PRODUCE TO HONEYWELL INTERNATIONAL INC.**

Honeywell International Inc. (hereinafter "Honeywell") makes the following Responses and Objections to Plaintiff's Third Amended Notice to Take Rule 30(b)(6) Video Deposition and Notice to Produce to Honeywell International Inc. (hereinafter "Notice of Deposition").

PREFACE

The Notice of Deposition and its associated topics of testimony or areas of inquiry (Exhibit A) and requests for documents (Exhibit B) seek information and documents for a period of over 80 years. Individuals who may have knowledge responsive to some of the requests are, due to the passage of time, deceased, or have faded memories, or are otherwise no longer available to Honeywell. Consequently, and notwithstanding the best efforts of Honeywell, potentially responsive information may have simply been lost before the time litigation ever commenced. Honeywell has, however, endeavored to obtain and record information from former employees of Honeywell, or its predecessors, if they were available to Honeywell



through direct interviews and/or review of relevant deposition or trial testimony. In addition, Honeywell has searched its files for written or otherwise recorded materials that may contain information responsive to these discovery requests. In that effort, documents in corporate headquarters and manufacturing facilities, to the extent that such documents still exist after the passage of many years, have been gathered and where relevant and responsive and subject to any objections are made available for inspection and copying. Understanding that not every document or item of information could possibly be identified and referred to herein, Honeywell asserts that such documents may supplement, expand upon and/or provide more detailed responses to these requests and therefore are incorporated by reference herein.

The responses to Plaintiffs' Notice of Deposition, therefore, are based upon: (a) information supplied by employees of The Bendix Corporation or documents in the possession of The Bendix Corporation through March 31, 1985; (b) information or documents acquired by or known to employees of the Automotive Sector of Allied Corporation from April 1, 1985, through September 29, 1987; (c) information or documents acquired by or known to employees of the Automotive Sector of AlliedSignal Inc. since September 30, 1987; (d) information of documents acquired by or known to employees of the Automotive Sector within Honeywell which has continued the "Bendix" line of friction automotive products since December 4, 1999; and (e) deposition testimony of Eugene Rogers, a former Bendix employee with knowledge of many of the issues raised by Plaintiff's Notice of Deposition. Mr. Rogers is now deceased.

In these responses, "Honeywell" refers to: (a) The Bendix Corporation prior to April 1, 1985; (b) the Automotive Sector of Allied Corporation from April 1, 1985 to September 29, 1987; (c) the Automotive Sector of AlliedSignal Inc. from September 30, 1987 through December 4, 1997; and (d) the friction materials business of Honeywell from December 4, 1999.

As the context of particular items or requests may require, the automotive friction products manufactured by Honeywell and its predecessors will be described by reference to their registered trademark, "Bendix." Items or requests addressed to matters of corporate identity (e.g., state of incorporation, principal place of business, etc.) are answered as they apply to Honeywell.

Honeywell further objects to certain of these Areas of Inquiry (Exhibit A) and Document Requests (Exhibit B) because the Bendix allegations in this matter are extremely limited. Christinna Phillips lent an occasional hand to Clyde Phillips during brake work and Clyde Phillips recalls having Bendix brakes on a 1987 Aerostar at one time. He simply recalled using Bendix brakes on the Aerostar one or two times and could not remember when. Further, Plaintiff attempts to argue at summary judgment that Clyde Phillips replaced original alleged Bendix brakes on a 1982 Ford F-150 and a 1979 Ford Mustang. Therefore, the Areas of Inquiry and Document Requests which are not so limited in scope are overbroad and unduly burdensome, and seek discovery of information which is neither admissible nor likely to lead to the discovery of admissible evidence.

PLAINTIFFS' AREAS OF INQUIRY (EXHIBIT A)

1. Defendant's document retention and litigation hold procedures.

Response: Objection, overbroad, unduly burdensome, and seeks irrelevant information not reasonable calculated to lead to the discovery of admissible evidence.

2. Defendant's and its predecessors' corporate structure and operations from the formation of the corporation to the present.

Response: Objection, overbroad, unduly burdensome, and seeks information which is neither relevant nor calculated to lead to the discovery of admissible evidence. Subject to and limited by these objections, this Request may be addressed at the deposition. Further, subject to and limited by these objections, the relevant corporate history is as follows: In 1924 Bendix Engineering Works was established in South Bend, Indiana. In 1929, The Bendix Corporation was formed and later changed its name to The Bendix Aviation

Corporation. In 1933, The Bendix Aviation Corporation acquired Marshall Asbestos Corporation, which operated as a separate subsidiary until it was merged into and became a division of The Bendix Aviation Corporation in 1939. In 1960, The Bendix Aviation Corporation changed its name to The Bendix Corporation. In 1983, Allied Corporation purchased The Bendix Corporation and on April 1, 1985, The Bendix Corporation was merged into Allied Corporation and ceased to exist as a legal entity. On September 30, 1987, Allied Corporation and the Signal Companies merged, creating Allied Signal Inc. In 1989, Allied Signal Inc. was renamed Allied-Signal Inc., which in 1993, was renamed AlliedSignal Inc. On December 4, 1999, AlliedSignal Inc. merged with Honeywell Inc. and Honeywell Inc. ceased to exist as a legal entity. On December 4, 1999, AlliedSignal Inc. changed its name to Honeywell International Inc.

The Bendix Corporation was incorporated in the State of Delaware and maintained its principal place of business in the State of Michigan. Allied Corporation was incorporated in the State of New York and maintained its principal place of business in the State of New Jersey. AlliedSignal Inc. was incorporated in the State of Delaware and maintained its principal place of business in the State of New Jersey. Honeywell is incorporated in Delaware and maintains its principal place of business in New Jersey.

Honeywell is the successor in interest to AlliedSignal Inc. which, in turn, was the successor in interest to The Bendix Corporation. Honeywell's Friction Materials, LLC is the business unit within Honeywell that continues the "Bendix" line of automotive friction products. Honeywell did not manufacture any asbestos-containing friction products in the United States after 2001. In 2009, Honeywell ceased manufacturing automotive friction products in the United States.

3. The retention, storage, and/or destruction of any documents requested to be provided in this Notice and Defendant's and its predecessors' policies from the formation of the corporation to the present with regard to retention, storage, and destruction of documents.

Response: Objection, overbroad, unduly burdensome, seeks irrelevant information, and is not reasonably calculated to lead to the discovery of relevant, material or admissible evidence. Subject to and limited by these objections, this Area of Inquiry may be addressed at the deposition. Further, subject to and limited by these objections, Honeywell states that it and its predecessors have had records retention guidelines, which specify varying periods of retention depending upon the corporate department involved (e.g., accounting, administration, contracts, engineering, finance, legal manufacturing, marketing, operations, personnel, research, etc.), as well as the type of documents involved. The deadlines have ranged anywhere from less than one year to permanent retention.

4. Defendant's and its predecessors' knowledge from the formation of the corporation to the present with respect to the hazards of asbestos exposure, and how Defendant and its predecessors, and its employees, acquired such knowledge.

Response: Objection, overbroad, unduly burdensome, and seeks information which is neither relevant nor calculated to lead to the discovery of admissible evidence.

Honeywell further objects to this Area of Inquiry as it is not limited to the relevant time period or the Bendix products to which exposure is alleged. Subject to and limited by these objections, this Area of Inquiry may be addressed at the deposition.

5. Defendant's and its predecessors' involvement or membership in any trade associations or similar organizations at any and all times since the formation of the corporation.

Response: Objection, overbroad, unduly burdensome, seeks irrelevant information, and is not reasonably calculated to lead to the discovery of relevant, material or admissible evidence. Honeywell further objects to this Area of Inquiry as it is not limited to the relevant time period. Subject to and limited by these objections, this Area of Inquiry may be addressed at the deposition. Further, subject to and limited by these objections, Honeywell International Inc. and its predecessors have been members of the following organization: Friction Materials Standards Institute, Inc. (1948 to present). The Bendix Corporation was also a member of the following organizations: Asbestos Information Association of North America (1974 to 1984) and Brake Lining Manufacturers Association (1939 to 1948).

6. All aspects of Defendant's and its predecessors entitlement, ability, or right to claim the benefits of insurance that may or could indemnify Defendant for any losses sustained or settlements paid as a result of lawsuits against Defendant claiming or alleging that exposure to asbestos-containing products caused injury or illness or that would cover the cost of defense of such lawsuits.

Response: Objection, overbroad, unduly burdensome, and would not produce admissible evidence nor is it reasonably calculated to lead to the discovery of admissible evidence. Subject to and limited by these objections, Honeywell has sufficient funds to cover costs of this claim.

7. Defendant's and its predecessors' membership in, or participation or involvement with, any organizations or associations, either national or international in scope, including but not limited to organizations or associations formed for the purpose of propagating or recommending safety standards, rules, or requirements and/or enhancing the safety of workers and/or users of products at any time since the formation of the corporation.

Response: Objection, repetitive to Area of Inquiry No. 5. Honeywell incorporates herein its Response and objections to Area of Inquiry No. 5. Subject to and limited by these objections, this Area of Inquiry may be addressed at the deposition.

8. Defendant's and its predecessors' knowledge of safety equipment for worker's protection against the inhalation of asbestos dust or asbestos fibers including but not limited to masks, respirators, other breathing devices, protective clothing, protective gloves, etc.

Response: Objection, overbroad, unduly burdensome, and seeks information which is neither relevant nor calculated to lead to the discovery of admissible evidence. Honeywell further objects to this Area of Inquiry in that it is not limited to the relevant

time period or the Bendix products to which exposure is alleged. Honeywell further objects to this Area of Inquiry to the extent it seeks knowledge of safety equipment for worker's protection against the inhalation of asbestos dust or asbestos fibers including but not limited to masks, respirators, other breathing devices, protective clothing, protective gloves, etc. in Bendix manufacturing facilities, which is irrelevant information in that the Plaintiff/Plaintiff's decedent was not an employee of Honeywell. The events that occurred in plants during mass production of friction materials bear no equivalence to the conditions experienced by a bystander of an end-user or by an end-user of individual units of finished automotive friction products. Specifically, the potential for exposure to chrysotile asbestos of individuals who work with or around finished asbestos-containing friction components in connection with vehicle maintenance activities is completely different than the potential for exposure of employees working in a friction materials plant, who may have worked in the vicinity of chrysotile asbestos fibers that had not yet been encapsulated in the resin binder matrix of a completed friction product. Subject to and limited by these objections, this Area of Inquiry may be addressed at the deposition.

9. Defendants' and its predecessors' dissemination, publication or distribution of any printed material, including brochures, warning signs or statements, memos, letters, correspondence, minutes, pamphlets, catalogs, packaging or other written material of any kind or character containing any information concerning the possibility of injury resulting from the use of asbestos-containing products or exposure to asbestos dust or asbestos fibers.

Response: Objection, overbroad, unduly burdensome and seeks irrelevant information not reasonably calculated to lead to the discovery of admissible evidence. Honeywell further objects to this Area of Inquiry in that it is not limited to the relevant time period or the Bendix products to which exposure is alleged. Subject to and limited by these objections, asbestos-containing friction products manufactured by Honeywell contained processed chrysotile asbestos fibers that were encapsulated or locked into the product itself. Together with various friction modifiers and fillers, the asbestos fibers were bound within a resin binder system and then baked at a temperature in excess of 350 degrees Fahrenheit. The heat generated during the braking process converted the processed chrysotile asbestos fiber in friction materials into harmless substances known as forsterite or olivine. Exposure to, or the use of, Honeywell's asbestos containing friction products did not pose a health hazard. Although Honeywell did not and does not believe that there is any health hazard associated with the use of its friction products, since at least as early as 1973, Honeywell and its predecessors placed a warning label on all cartons and boxes of asbestos-containing friction products shipped to customers to explicitly make Bendix customers aware of the asbestos component of friction materials. The warning label used from 1973 to August 1986 read as follows:

**CAUTION
CONTAINS ASBESTOS FIBERS
AVOID CREATING DUST
BREATHING ASBESTOS DUST MAY
CAUSE SERIOUS BODILY HARM**

From September 1986 to 2001, the warning label read as follows:

**DANGER
CONTAINS ASBESTOS FIBERS
AVOID CREATING DUST
CANCER AND LUNG DISEASE HAZARD**

Each warning was consistent with the warning specified by OSHA for asbestos-containing materials. Honeywell also labeled shipments of asbestos-containing friction products sent in bulk in containers or on pallets to original equipment manufacturers with the specific warnings quoted above, during the time periods specified.

In June 1973, The Bendix Corporation issued General Bulletin G-73-6 to all rebuilder customers regarding steps necessary to comply with the OSHA regulations, including a statement that "[c]aution labels or lettering should be affixed to any carton or box that may have its contents reground" in conformity with the OSHA language. In 1977, The Bendix Corporation first mailed to its distributors and rebuilder customers copies of the Friction Materials Standards Institute's (FMSI's) Brake Lining and Clutch Facing Automotive Data Book which contained a section entitled "Recommended Procedures For Reducing Asbestos Dust During Brake Servicing." Since 1977, The Bendix Corporation and its successors have distributed subsequent editions of the FMSI Data Book (also containing a section entitled "Recommended Procedures for Reducing Asbestos Dust During Brake Servicing") to customers. In March 1979, The Bendix Corporation mailed to its distributors and rebuilder customers a Friction Materials Standards Institute publication (dated October 1978) entitled "Friction Materials Work Practices Guide." During 1984 and 1985, Allied Corporation's Automotive Sector mailed "Product Fact Sheets" to all customers. Beginning July 30, 1986, consistent with OSHA's Hazard Communication Standard, Honeywell and its predecessors distributed a Material Safety Data Sheet to all customers.

Honeywell and its predecessors took these steps, and complied with OSHA asbestos warning regulations, even though those regulations did not require a warning on asbestos-containing friction products, and even though exposure to asbestos-containing friction products does not result in an exposure to asbestos fibers equal to or in excess of OSHA exposure limits for asbestos fibers.

10. Defendant's and its predecessors' tests, studies, dust counts or measurements conducted by Defendant, its predecessors, its representatives, its insurance carriers and/or its agents to determine the quantity of asbestos fibers in the air as a result of the use of asbestos-containing products.

Response: Objection, overbroad, unduly burdensome and seeks irrelevant information not reasonably calculated to lead to the discovery of admissible evidence. Honeywell further objects to this Area of Inquiry to the extent it seeks information regarding testing, dust counts and measurements in Bendix manufacturing facilities, which is irrelevant information in that the Plaintiff/Plaintiff's decedent was not an employee of

Honeywell. The events that occurred in plants during mass production of friction materials bear no equivalence to the conditions experienced by a bystander of an end-user or by an end-user of individual units of finished automotive friction products. Specifically, the potential for exposure to chrysotile asbestos of individuals who work with or around finished asbestos-containing friction components in connection with vehicle maintenance activities is completely different than the potential for exposure of employees working in a friction materials plant, who may have worked in the vicinity of chrysotile asbestos fibers that had not yet been encapsulated in the resin binder matrix of a completed friction product. Subject to and limited by these objections, this Area of Inquiry may be addressed at the deposition.

11. The identity and last known address of all employees of the Defendant and its predecessor from the formation of the corporation to the present engaged in the following areas: medicine, industrial hygiene and safety.

Response: Objection, overbroad, unduly burdensome, and seeks information which is neither relevant nor calculated to lead to the discovery of admissible evidence. Honeywell further objects to this Area of Inquiry in that it is not limited to the relevant time period or the Bendix products to which exposure is alleged.

12. Knowledge of asbestos substitutes from the formation of the corporation to the present.

Response: Objection, overbroad, unduly burdensome, and seeks information which is neither relevant nor calculated to lead to the discovery of admissible evidence. Honeywell further objects to this Area of Inquiry in that it is not limited to the relevant time period or the Bendix products to which exposure is alleged.

13. Whether Defendant sold, supplied, and/or maintained any asbestos-containing products, including but not limited to, vehicles, brakes, brake lining, brake pads, brake shoes, brake components, brake drums, brake discs, brake arc grinding equipment, brake arc grinder machines, clutches, clutch plates, clutch lining, clutch facings, other clutch or transmission components, engine components, or engine gaskets, to the following sites:

1. Landmark Dodge in metropolitan Atlanta, GA
2. Southlake Ford in metropolitan Atlanta, GA
3. Harry White Ford in East Point, GA
4. Ford dealerships in metropolitan Atlanta, GA
5. Lincoln Mercury dealerships Morrow, GA
6. Autozone stores in Riverdale, GA and Jonesboro
7. Volkswagen dealerships metropolitan Atlanta, GA including Forest Park, GA
8. Pep Boys stores in Riverdale, GA and Jonesboro
9. Genuine Parts or NAPA store location in or around metropolitan Atlanta, GA, including but not limited to Hapeville, GA; Forest Park, GA, Jonesboro, GA, and Riverdale GA;

10. Any other store, outlet, dealership, or other location identified in Plaintiff Clyde Stanley Phillip's testimony, as well as any other fact witness' testimony in this case.

Response: [Objection, vague, ambiguous, overbroad, unduly burdensome, and seeks irrelevant information not reasonable calculated to lead to the discovery of admissible evidence as there is no evidence in the record that Ms. Phillips was ever exposed to any asbestos from any work Mr. Phillips performed with products supplied by the entities listed in 1-10. Additionally, Honeywell further objections to this Area of Inquiry in that it is not limited to the relevant time period or the Bendix product(s) to which exposure is alleged. Honeywell further objects to this Area of Inquiry to the extent that it suggests that any Honeywell asbestos-containing product was subject to repair, maintenance, removal and/or replacement at the sites identified as 1-9 above as there has been no such testimony in this matter. Subject to and limited by its objections, this Area of Inquiry may be addressed at the deposition.

14. Whether Defendant ever specifically informed its employees, clients and customers, the employees of its clients and customers and the employees of outside contractors working on the premises of its clients and customers that exposure to asbestos dust could cause asbestosis, pneumoconiosis, lung cancer, mesothelioma and/or other cancers.

Response: Objection, overbroad, unduly burdensome, and seeks information which is neither relevant nor calculated to lead to the discovery of admissible evidence since, among other things, it is not limited to the relevant time period, the Bendix products to which exposure is alleged, or the disease alleged in this case. Honeywell further objects to the extent the Area of Inquiry seeks information about cancers and other diseases other than the disease alleged in this case. Additionally, Honeywell objects to this Area of Inquiry to the extent it seeks information regarding Bendix manufacturing facilities and/or Honeywell employees, which is irrelevant information in that the Plaintiff/Plaintiff's decedent was not an employee of Honeywell. The events that occurred in plants during mass production of friction materials bear no equivalence to the conditions experienced by a bystander of an end-user or by an end-user of individual units of finished automotive friction products. Specifically, the potential for exposure to chrysotile asbestos of individuals who work with or around finished asbestos-containing friction components in connection with vehicle maintenance activities is completely different than the potential for exposure of employees working in a friction materials plant, who may have worked in the vicinity of chrysotile asbestos fibers that had not yet been encapsulated in the resin binder matrix of a completed friction product. Finally, Honeywell further objects to this request to the extent it suggests that asbestos contained in Bendix asbestos-containing friction products can be hazardous to end-users of Bendix friction products or that Honeywell had a related duty to warn. Honeywell is not aware of, and specifically denies, any causal connection between its asbestos-containing friction products and any of the diseases listed above. Asbestos-containing friction products manufactured by Honeywell contained processed chrysotile asbestos fibers that were encapsulated or locked into the product itself. Together with various friction modifiers and fillers, the asbestos fibers were bound within a resin binder system and then baked at a temperature in excess of 350 degrees

Fahrenheit. The heat generated during the braking process converted the processed chrysotile asbestos fiber in friction materials into harmless substances known as forsterite or olivine. Exposure to, or the use of, Honeywell's asbestos-containing friction products did not pose a health hazard. Subject to and limited by these objections, this Area of Inquiry may be addressed at the deposition. Further, subject to and limited by these objections, Honeywell incorporates herein its Response to Area of Inquiry No. 14.

15. Whether you contend that you did not have any reason or duty to warn Plaintiff, Plaintiffs' employers, business invitees and/or users of the asbestos products used, installed, utilized and/or removed on the premises of your clients and customers of the hazards and risks of use of and exposure thereto.

Response: Objection, overbroad, unduly burdensome, and seeks information which is neither relevant nor calculated to lead to the discovery of admissible evidence. Honeywell further objects to this Area of Inquiry in that it is not limited to the relevant time period or the Bendix products to which exposure is alleged. Honeywell further objects to the extent the Area of Inquiry implies Honeywell had a duty to warn Plaintiff, which Honeywell denies, and to the extent it calls for a legal conclusion. Additionally, Honeywell objects to this Area of Inquiry to the extent it seeks information regarding Bendix manufacturing facilities and/or Honeywell employees, which is irrelevant information in that the Plaintiff/Plaintiff's decedent was not an employee of Honeywell. The events that occurred in plants during mass production of friction materials bear no equivalence to the conditions experienced by a bystander of end-use or by an end-user of individual units of finished automotive friction products. Specifically, the potential for exposure to chrysotile asbestos of individuals who work with or around finished asbestos-containing friction components in connection with vehicle maintenance activities is completely different than the potential for exposure of employees working in a friction materials plant, who may have worked in the vicinity of chrysotile asbestos fibers that had not yet been encapsulated in the resin binder matrix of a completed friction product. Finally, Honeywell further objects to this request to the extent it suggests that asbestos contained in Bendix asbestos-containing friction products can be hazardous to end-users of Bendix friction products or that Honeywell had a related duty to warn. Honeywell is not aware of, and specifically denies, any causal connection between its asbestos-containing friction products and any of the diseases listed above. Asbestos-containing friction products manufactured by Honeywell contained processed chrysotile asbestos fibers that were encapsulated or locked into the product itself. Together with various friction modifiers and fillers, the asbestos fibers were bound within a resin binder system and then baked at a temperature in excess of 350 degrees Fahrenheit. The heat generated during the braking process converted the processed chrysotile asbestos fiber in friction materials into harmless substances known as forsterite or olivine. Exposure to, or the use of, Honeywell's asbestos-containing friction products did not pose a health hazard. Further, subject to and limited by these objections, Honeywell incorporates herein its Response to Area of Inquiry No. 9.

16. Whether you ever specifically informed your employees, clients and customers, the employees of your clients and customers and the employees of outside contractors working on the premises of your clients and customers that exposure to asbestos dust taken home from the

jobsite on peoples' clothing could cause asbestosis, pneumoconiosis, lung cancer, mesothelioma and/or other cancers in family members of those persons.

Response: Objection, overbroad, unduly burdensome, and seeks information which is neither relevant nor calculated to lead to the discovery of admissible evidence. Honeywell further objects to this Area of Inquiry in that it is not limited to the relevant time period or the Bendix products to which exposure is alleged. Additionally, Honeywell objects to this Area of Inquiry to the extent it seeks information regarding Bendix manufacturing facilities and/or Honeywell employees, which is irrelevant information in that the Plaintiff/Plaintiff's decedent was not an employee of Honeywell. The events that occurred in plants during mass production of friction materials bear no equivalence to the conditions experienced by a bystander of end-use or by an end-user of individual units of finished automotive friction products. Specifically, the potential for exposure to chrysotile asbestos of individuals who work with or around finished asbestos-containing friction components in connection with vehicle maintenance activities is completely different than the potential for exposure of employees working in a friction materials plant, who may have worked in the vicinity of chrysotile asbestos fibers that had not yet been encapsulated in the resin binder matrix of a completed friction product. Finally, Honeywell further objects to this request to the extent it suggests that asbestos contained in Bendix asbestos-containing friction products can be hazardous to end-users of Bendix friction products or that Honeywell had a related duty to warn. Honeywell is not aware of, and specifically denies, any causal connection between its asbestos-containing friction products and any of the diseases listed above. Asbestos-containing friction products manufactured by Honeywell contained processed chrysotile asbestos fibers that were encapsulated or locked into the product itself. Together with various friction modifiers and fillers, the asbestos fibers were bound within a resin binder system and then baked at a temperature in excess of 350 degrees Fahrenheit. The heat generated during the braking process converted the processed chrysotile asbestos fiber in friction materials into harmless substances known as forsterite or olivine. Exposure to, or the use of, Honeywell's asbestos-containing friction products did not pose a health hazard.

17. Whether you contend that you did not have any reason or duty to warn Plaintiff, its employees, your clients and customers, the employees of your clients and customers and the employees of outside contractors working on the premises of your clients and customers that exposure to asbestos dust taken home on peoples' clothing could cause asbestosis, pneumoconiosis, lung cancer, mesothelioma and/or other cancers in family members of those persons.

Response: Objection, overbroad, unduly burdensome, and seeks information which is neither relevant nor calculated to lead to the discovery of admissible evidence since, among other things, it is not limited to the relevant time period or the Bendix products to which exposure is alleged, or the disease that are alleged in this case. Honeywell objects to the extent the Area of Inquiry implies Honeywell had a duty to warn Plaintiff, which Honeywell denies, and to the extent it calls for a legal conclusion. Additionally, Honeywell objects to this Area of Inquiry to the extent it seeks information regarding Bendix manufacturing facilities and/or Honeywell employees, which is irrelevant information in

that the Plaintiff/Plaintiff's decedent was not an employee of Honeywell. The events that occurred in plants during mass production of friction materials bear no equivalence to the conditions experienced by a bystander of end-use or by an end-user of individual units of finished automotive friction products. Specifically, the potential for exposure to chrysotile asbestos of individuals who work with or around finished asbestos-containing friction components in connection with vehicle maintenance activities is completely different than the potential for exposure of employees working in a friction materials plant, who may have worked in the vicinity of chrysotile asbestos fibers that had not yet been encapsulated in the resin binder matrix of a completed friction product. Finally, Honeywell further objects to this request to the extent it suggests that asbestos contained in Bendix asbestos-containing friction products can be hazardous to end-users of Bendix friction products or that Honeywell had a related duty to warn. Honeywell is not aware of, and specifically denies, any causal connection between its asbestos-containing friction products and any of the diseases listed above. Asbestos-containing friction products manufactured by Honeywell contained processed chrysotile asbestos fibers that were encapsulated or locked into the product itself. Together with various friction modifiers and fillers, the asbestos fibers were bound within a resin binder system and then baked at a temperature in excess of 350 degrees Fahrenheit. The heat generated during the braking process converted the processed chrysotile asbestos fiber in friction materials into harmless substances known as forsterite or olivine. Exposure to, or the use of, Honeywell's asbestos-containing friction products did not pose a health hazard.

18. Whether you contend that you performed adequate tests regarding the safety of the asbestos products and/or components that you sold, specified, used, installed, and/or utilized on/at the premises of your clients and customers, including, but not limited to, the sites identified in item #13 above.

Response: Objection, Honeywell incorporates herein its objections and response to Area of Inquiry #13. Honeywell further objects as overbroad, unduly burdensome, and seeks information which is neither relevant nor calculated to lead to the discovery of admissible evidence since, among other things, it is not limited to the relevant time period or the Bendix products to which exposure is alleged. Subject to and limited by these objections, this Area of Inquiry may be addressed at the deposition.

19. The corporate structure concerning medical directors, industrial hygienists, physicians, biological scientists or consultants in these fields from the formation of the corporation to the present, including the name, title, duties, responsibilities, period of employment, to whom the individual reported, the current or last known business and residential address of each medical director, industrial hygienist, physician, biological scientist or consulted of yours, the location, identifying titles or codes, and custodians of all reports or memoranda written by each, the professional specialization of each, the reason for hiring each such person and the name and address of the person in your company responsible for hiring each such person.

Response: Objection, overbroad, unduly burdensome, and seeks information which is neither relevant nor calculated to lead to the discovery of admissible evidence. Among other things, it is not limited to the relevant time period or the Bendix products to which

exposure is alleged. Additionally, Honeywell objects to this Area of Inquiry to the extent it seeks information regarding Bendix manufacturing facilities and/or Honeywell employees, which is irrelevant information in that the Plaintiff/Plaintiff's decedent was not an employee of Honeywell. The events that occurred in plants during mass production of friction materials bear no equivalence to the conditions experienced by a bystander of end-use or by an end-user of individual units of finished automotive friction products. Specifically, the potential for exposure to chrysotile asbestos of individuals who work with or around finished asbestos-containing friction components in connection with vehicle maintenance activities is completely different than the potential for exposure of employees working in a friction materials plant, who may have worked in the vicinity of chrysotile asbestos fibers that had not yet been encapsulated in the resin binder matrix of a completed friction product. Finally, Honeywell further objects to this request to the extent it suggests that asbestos contained in Bendix asbestos-containing friction products can be hazardous to end-users of Bendix friction products or that Honeywell had a related duty to warn. Honeywell is not aware of, and specifically denies, any causal connection between its asbestos-containing friction products and any of the diseases listed above. Asbestos-containing friction products manufactured by Honeywell contained processed chrysotile asbestos fibers that were encapsulated or locked into the product itself. Together with various friction modifiers and fillers, the asbestos fibers were bound within a resin binder system and then baked at a temperature in excess of 350 degrees Fahrenheit. The heat generated during the braking process converted the processed chrysotile asbestos fiber in friction materials into harmless substances known as forsterite or olivine. Exposure to, or the use of, Honeywell's asbestos-containing friction products did not pose a health hazard. Subject to and limited by its objections, this Area of Inquiry may be addressed at the deposition.

20. Identity of all companies which have provided you Worker's Compensation insurance, liability insurance, director and officer insurance and accident and disability insurance since the formation of the corporation and the inclusive dates of coverage for each such company.

Response: Objection, overbroad, unduly burdensome, and seeks information which is neither relevant nor calculated to lead to the discovery of admissible evidence. Further, this Area of Inquiry is repetitive of Area of Inquiry No. 6. Honeywell incorporates herein its Response and objections to Area of Inquiry No. 6. Furthermore, Honeywell objects to this Area of Inquiry because it seeks information relating to workers' compensation claims, which is beyond the scope of discovery, inasmuch as claims made by current or former Honeywell employees are not, themselves, relevant, to any allegation asserted in this case, nor is the existence of such claims or any details relating to them likely to lead to the discovery of admissible evidence in this case. Honeywell additionally objects to this Area of Inquiry to the extent it is not limited to workers' compensation claims asserted in the United States. This Request seeks irrelevant information concerning lawsuits or other proceedings involving different persons, events and circumstances having no relationship to Plaintiff's allegations in this case. The events that occurred in plants during mass production of friction materials bear no equivalence to the conditions experienced by a bystander to end-use or to an end-user handling finished automotive friction products in a

vehicle maintenance setting. Specifically, the potential for exposure to chrysotile asbestos of individuals who work with or around finished asbestos-containing friction components in connection with vehicle maintenance activities is completely different than the potential for exposure of employees working in a friction materials plant, who may have worked in the vicinity of chrysotile asbestos fibers that had not yet been encapsulated in the resin binder matrix of a completed friction product.

21. Any and each communication between Defendant and any insurance carrier regarding the risks and potential risks of asbestos exposure by Defendant's employees at any time prior.

Response: Objection, overbroad, unduly burdensome, and seeks information which is neither relevant nor calculated to lead to the discovery of admissible evidence since, among other things, it is not limited to the relevant time period or the Bendix products to which exposure is alleged and to the extent it seeks information subject to the attorney-client privilege or the attorney work product doctrine. Honeywell further objects in that it seeks information relating to the exposure of Bendix employees to asbestos, which is irrelevant in that the Plaintiff/Plaintiff's Decedent was not an employee of Honeywell. The events that occurred in plants during mass production of friction materials bear no equivalence to the conditions experienced by an end-user of individual units of finished automotive friction products. Specifically, the potential for exposure to chrysotile asbestos of individuals who work with or around finished asbestos-containing friction components in connection with vehicle maintenance activities is completely different than the potential for exposure of employees working in a friction materials plant, who may have worked in the vicinity of chrysotile asbestos fibers that had not yet been encapsulated in the resin binder matrix of a completed friction product.

22. Any and each communication between Defendant and any insurance carrier regarding the risks and potential risks of asbestos exposure by family members of Defendant's employees at any time.

Response: Objection, overbroad, unduly burdensome, and seeks information which is neither relevant nor calculated to lead to the discovery of admissible evidence since, among other things, it is not limited to the relevant time period or the Bendix products to which exposure is alleged. Honeywell further objects that this Area of Inquiry is irrelevant in that there are no allegations of injury to family/household members of Honeywell employees resulting from the use of asbestos-containing products in this matter. Additionally, Honeywell objects to this Area of Inquiry to the extent it seeks information regarding Bendix manufacturing facilities and/or Honeywell employees, which is irrelevant information in that the Plaintiff/Plaintiff's decedent was not an employee of Honeywell. The events that occurred in plants during mass production of friction materials bear no equivalence to the conditions experienced by a bystander of end-use or by an end-user of individual units of finished automotive friction products. Specifically, the potential for exposure to chrysotile asbestos of individuals who work with or around finished asbestos-containing friction components in connection with vehicle maintenance activities is completely different than the potential for exposure of employees working in a friction

materials plant, who may have worked in the vicinity of chrysotile asbestos fibers that had not yet been encapsulated in the resin binder matrix of a completed friction product.

23. Any and all dust and/or air quality studies and/or industrial hygiene surveys conducted by Defendant or others to determine the levels of asbestos fiber released during the installation, use, maintenance or removal of Defendant's products.

Response: Objection, overbroad, unduly burdensome, and seeks information which is neither relevant nor calculated to lead to the discovery of admissible evidence. Honeywell further objects to this Area of Inquiry in that it is not limited to the relevant time period or the Bendix products to which exposure is alleged. Lastly, Honeywell objects to this request to the extent it is unintelligible in the context of this case and this case's facts as they relate to Honeywell.

24. Any and all dust and/or air quality studies and/or industrial hygiene surveys conducted by Defendant or others to determine the levels of asbestos fiber released during the washing of clothes and/or the performance of any other activities at the home of your employees, your clients and customers, the employees of your clients and customers and the employees of outside contractors working on the premises of your clients and customers and/or any location other than a person's jobsite.

Response: Objection, overbroad, unduly burdensome, and seeks information which is neither relevant nor calculated to lead to the discovery of admissible evidence since, among other things, it is not limited to the relevant time period or the Bendix products to which exposure is alleged. Honeywell further objects that this Area of Inquiry is irrelevant in that there are no allegations of injury to family/household members of Honeywell employees resulting from the use of asbestos-containing products in this matter. Additionally, Honeywell objects to this Area of Inquiry to the extent it seeks information regarding Bendix manufacturing facilities and/or Honeywell employees, which is irrelevant information in that the Plaintiff/Plaintiff's decedent was not an employee of Honeywell. The events that occurred in plants during mass production of friction materials bear no equivalence to the conditions experienced by a bystander of end-use or by an end-user of individual units of finished automotive friction products. Specifically, the potential for exposure to chrysotile asbestos of individuals who work with or around finished asbestos-containing friction components in connection with vehicle maintenance activities is completely different than the potential for exposure of employees working in a friction materials plant, who may have worked in the vicinity of chrysotile asbestos fibers that had not yet been encapsulated in the resin binder matrix of a completed friction product.

25. The supplier and/or manufacturer of any asbestos, asbestos-containing products and/or component parts associated with Defendant's products at the sites identified in item #13 above.

Response: Honeywell incorporates herein its objections and response to Area of Inquiry #13. Honeywell further objects as overbroad, unduly burdensome, and seeks information which is neither relevant nor calculated to lead to the discovery of admissible

evidence since, among other things, it is not limited to relevant time periods or geographic areas, or the parties to this litigation, or the friction products involved in this litigation. Subject to and limited by the foregoing objections, the suppliers of raw asbestos for Honeywell in connection with the manufacture of friction products were as follows:

Bell Asbestos Mines Ltd.
1973 to 1983

Canadian Johns-Manville Ltd. or
JM Asbestos Sales, Inc.
1939 to 2001

Lake Asbestos (Lac d'Amiante du Quebec L'tee.)
1960 to 1986

The Ruberoid Co.
1939 to 1975

Vermont Asbestos Group
1975 to 2001

Subject to and limited by its objections, this Area of Inquiry may be addressed at the deposition.

26. Whether Defendant made any recommendations as to the work practices that should be used during the repair, maintenance, removal and/or replacement of Defendant's products and/or any component parts, at the sites identified in item #13 above.

Response: Honeywell incorporates herein its objections and response to Area of Inquiry #13 above. Honeywell further objects to this Area of Inquiry to the extent that it suggests that any Honeywell asbestos-containing product was subject to repair, maintenance, removal and/or replacement at the sites identified as 1-9 of item #13 above as there has been no such testimony in this matter.

27. Whether Defendant made any recommendations as to respiratory protection that should be used during the repair, maintenance, removal and/or replacement of Defendant's products and/or component parts, at each of the sites identified in item #13 above.

Response: Honeywell incorporates herein its objections and response to Area of Inquiry #13 above. Honeywell further objects to this Area of Inquiry to the extent that it suggests that any Honeywell asbestos-containing product was subject to repair, maintenance, removal and/or replacement at the sites identified as 1-9 of item #13 above as there has been no such testimony in this matter.

28. Whether Defendant made any recommendations as to the measures necessary to protect family/household members of Defendant's employees from exposure to asbestos.

Response: Objection, overbroad, unduly burdensome, and seeks information which is neither relevant nor calculated to lead to the discovery of admissible evidence since, among other things, it is not limited to the relevant time period or the Bendix products to which exposure is alleged. Honeywell further objects that this Area of Inquiry is irrelevant in that there are no allegations of injury to family/household members of Honeywell employees resulting from the use of asbestos-containing products in this matter. Additionally, Honeywell objects to this Area of Inquiry to the extent it seeks information regarding Bendix manufacturing facilities and/or Honeywell employees, which is irrelevant information in that the Plaintiff/Plaintiff's decedent was not an employee of Honeywell. The events that occurred in plants during mass production of friction materials bear no equivalence to the conditions experienced by a bystander of end-use or by an end-user of individual units of finished automotive friction products. Specifically, the potential for exposure to chrysotile asbestos of individuals who work with or around finished asbestos-containing friction components in connection with vehicle maintenance activities is completely different than the potential for exposure of employees working in a friction materials plant, who may have worked in the vicinity of chrysotile asbestos fibers that had not yet been encapsulated in the resin binder matrix of a completed friction product.

29. Whether the Defendant made any recommendations as to the measures necessary to protect family/household members of Defendant's employees from exposure to any chemical, dust, or any other toxic substance.

Response: Objection, overbroad, unduly burdensome, and seeks information which is neither relevant nor calculated to lead to the discovery of admissible evidence since, among other things, it is not limited to the relevant time period or the Bendix products to which exposure is alleged. Honeywell further objects that this Area of Inquiry is irrelevant in that there are no allegations of injury to family/household members of Honeywell employees resulting from the use of asbestos-containing products in this matter. Additionally, Honeywell objects to this Area of Inquiry to the extent it seeks information regarding Bendix manufacturing facilities and/or Honeywell employees, which is irrelevant information in that the Plaintiff/Plaintiff's decedent was not an employee of Honeywell. The events that occurred in plants during mass production of friction materials bear no equivalence to the conditions experienced by a bystander of end-use or by an end-user of individual units of finished automotive friction products. Specifically, the potential for exposure to chrysotile asbestos of individuals who work with or around finished asbestos-containing friction components in connection with vehicle maintenance activities is completely different than the potential for exposure of employees working in a friction materials plant, who may have worked in the vicinity of chrysotile asbestos fibers that had not yet been encapsulated in the resin binder matrix of a completed friction product.

30. Tests conducted by Defendant concerning the release of asbestos fibers associated with the installation, removal, cutting, sawing, abrading, maintenance, replacement or otherwise working with asbestos-containing materials used in the construction of Defendant's products and/or asbestos-containing components.

Response: Objection, vague, ambiguous, unintelligible as written, overbroad, unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence. Honeywell further objects to this Area of Inquiry as it is not limited to the relevant time period or the Bendix products to which exposure is alleged, or the allegations in this matter. Additionally, Honeywell objects to this Document Request to the extent it seeks information regarding Bendix manufacturing facilities and/or Honeywell employees, which is irrelevant information in that the Plaintiff/Plaintiff's decedent was not an employee of Honeywell. The events that occurred in plants during mass production of friction materials bear no equivalence to the conditions experienced by a bystander of an end-user or by an end-user of individual units of finished automotive friction products. Specifically, the potential for exposure to chrysotile asbestos of individuals who work with or around finished asbestos-containing friction components in connection with vehicle maintenance activities is completely different than the potential for exposure of employees working in a friction materials plant, who may have worked in the vicinity of chrysotile asbestos fibers that had not yet been encapsulated in the resin binder matrix of a completed friction product. Subject to and limited by these objections, this Area of Interest may be addressed at the deposition.

31. The existence, extent, type, organization, filing system, method of access or retrieval, and/or location of Defendants hard copy documents or computerized records or other records pertaining to the subject matter areas described in paragraphs one through ten, above, that were created, maintained or stored by electronic and/or magnetic means, including but not limited to records that have been microfilmed, microfiched, imaged, scanned, or stored on tapes, disks, diskettes, CD-rom, etc. or on or within any computer hardware, backup system, download system, file dumping or other system of information management, whether on-site or off-site.

Response: Objection, overbroad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence. Honeywell further objects to this area of inquiry to the extent that it seeks information that is subject to attorney-client privilege, attorney work product, or otherwise subject to privileged. Without waiving this objection, Honeywell states that its document retention policy is not relevant to the subject matter involved in the action currently pending. Additionally, Honeywell incorporates its objections and response to Area of Inquiry #13 above, including paragraphs 1 through 10 of that Area of Inquiry, herein.

32. Defendant's document destruction or retention policies.

Response: Objection, overbroad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving this objection, Honeywell states that its document retention policy is not relevant to the subject matter involved in the action currently pending.

33. Produce and Authenticate all of the Material Safety Data Sheets created for all asbestos-containing friction materials manufactured, distributed, sold, used, and/or specified by Defendant and its successors and predecessors, and provide a witness to discuss the creations of the Material Safety Data Sheets.

Response: Objection to the extent this is not an Area of Inquiry. Furthermore, Honeywell objects to this topic as overbroad, unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence. Honeywell further objects to this Area of Inquiry as it is not limited to the relevant time period or the Bendix products to which exposure is alleged, or the allegations in this matter. Subject to and without waiving its objections, the existence of Material Safety Data Sheets may be addressed at the deposition.

34. Whether any of Defendant's asbestos-containing products included any notice, warning, label, and/or disclosure presented on a product, its packaging, instructions, or any written material of any kind to inform consumers of a product's hazards.

Response: Objection, overbroad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence. Honeywell further objects to this Area of Inquiry as it is not limited to the relevant time period or the Bendix products to which exposure is alleged, or the allegations in this matter. Subject to and limited to objections, Honeywell incorporates its objections and response to Area of Inquiry #9 herein. Additionally, warnings placed in and on boxes of automotive friction materials may be addressed at the deposition.

35. Defendant's corporate stewardship program throughout the corporation's history, including but not limited to policies aimed to prevent contamination of the environment with hazardous materials, testing of products, and safe design relating to asbestos.

Response: Objection, overbroad, unduly burdensome, and seeks information which is neither relevant nor calculated to lead to the discovery of admissible evidence. Honeywell further objects to this Area of Inquiry as it is not limited to the relevant time period or the Bendix products to which exposure is alleged, or the allegations in this matter. Honeywell further objects and states that any corporate stewardship program as defined above is not relevant to the subject matter involved in the action currently pending. Such information is inadmissible at trial and inquiry into such information is not reasonably calculated to lead to the discovery of admissible evidence. Subject to and limited by these objections, this Area of Inquiry may be addressed at the deposition.

36. Defendant's hiring of Drs. Victor Roggli, Gary Marsh and Ada Youk which led to the publication of Marsh et al, *Asbestos fiber concentrations in the lungs of brake repair workers: commercial amphiboles levels are predictive of chrysotile levels* Inhalation Toxicology, 2011; 23(12): 681-688. The witness should be able to authenticate all documents produced in response to request for production number 44 below.

Response: Objection, overbroad, unduly burdensome, and seeks information which is neither relevant nor calculated to lead to the discovery of admissible evidence since, among other things, it is not limited to the relevant time period, the Bendix products to which exposure is alleged, and there is no allegation that Ms. Phillips is or was a brake repair worker. Honeywell also objects to this request to the extent that it is more than an

Area of Inquiry. Furthermore, Honeywell objects to this request on the grounds that it improperly seeks information, documentation, and/or testimony from Honeywell regarding Dr. Victor Roggli, Dr. Gary Marsh, and Dr. Ada O. Youk. Drs. Roggli, Marsh, and Youk are not employees or officers of Honeywell and, therefore, are not witnesses that Honeywell controls. Thus, any documentation sought by Plaintiff about Dr. Roggli, Dr. Marsh, or Dr. Youk, or any documents in the care, custody or control of Drs. Roggli, Marsh and Youk, are not in Honeywell's care, custody or control. If Plaintiff seeks documents or other data from Drs. Roggli, Marsh, Youk, the proper method of discovery is to depose those individuals through Plaintiff's third party practice or by agreement of counsel in this case. Doing so would be more convenient, less burdensome, and less expensive than deposing Honeywell's corporate designee on issues better addressed by these witnesses.

37. Whether Defendant has paid money and/or retained the services of any individual, entity or company to study, research, and/or author reports or articles concerning asbestos, asbestos related diseases, lung cancer and/or mesothelioma.

Response: Objection, vague, overbroad, unduly burdensome, and seeks information which is neither relevant nor calculated to lead to the discovery of admissible evidence since, among other things, it is not limited to the relevant time period and the Bendix products to which exposure is alleged. Subject to and without waiving its objections, this Area of Inquiry may be addressed at the deposition.

38. Sale of asbestos containing friction materials to Ford Motor Company for use as OEM equipment (and replacement parts) in newly manufactured Ford cars, light trucks, heavy trucks, industrial/construction tractors and farm tractors.

Response: Objection, overbroad, unduly burdensome, and seeks information which is neither relevant nor calculated to lead to the discovery of admissible evidence since, among other things, it is not limited to the relevant time period, the relevant vehicles, and the Bendix products to which exposure is alleged. Subject to and without waiving its objections, this Area of Inquiry may be addressed at the deposition

DOCUMENT REQUESTS RESPONSE AND OBJECTIONS (EXHIBIT B)

Subject to and limited by the objections set forth below, Honeywell is producing responsive documents with this pleading.

1. All documents in Defendant's possession relating to insurance or insurance coverage proceeds or any other benefit that would or could indemnify Defendant for any losses sustained as a result of any cause of action brought by Plaintiffs or would or could cover the cost of defense of such lawsuits, including legal fees.

Response: Objection, this Request is overbroad and unduly burdensome, and would not produce admissible evidence nor is it reasonably calculated to lead to the discovery of admissible evidence. Subject and limited by these objections, Honeywell has sufficient funds to cover costs of this claim.

2. All printed material, including brochures, pamphlets, catalogues, packaging or other written material of any kind or character containing any warnings concerning the possibility of injury to Defendant's employees resulting from the use of asbestos-containing products.

Response: Objection, overbroad, unduly burdensome, and seeks information which is neither relevant nor calculated to lead to the discovery of admissible evidence since, among other things, it is not limited to the relevant time period or the friction products to which exposure is alleged. Further, this Request seeks irrelevant information in that the Plaintiff/Plaintiff's decedent was not an employee of Honeywell. The events that occurred in plants during mass production of friction materials bear no equivalence to the conditions experienced by an end-user of individual units of finished automotive friction products. Specifically, the potential for exposure to chrysotile asbestos of individuals who work with or around finished asbestos-containing friction components in connection with vehicle maintenance activities is completely different than the potential for exposure of employees working in a friction materials plant, who may have worked in the vicinity of chrysotile asbestos fibers that had not yet been encapsulated in the resin binder matrix of a completed friction product.

3. All printed material, including brochures, pamphlets, catalogues, packaging or other written material of any kind or character containing any warnings concerning the possibility of injury to workers other than Defendant's employees resulting from the use of asbestos-containing products.

Response: Objection, vague, overbroad and unduly burdensome. Honeywell further objects to this Request in that, among other things, it is not limited to the relevant time period or to the friction products to which exposure is alleged. In addition, Honeywell incorporates herein its Honeywell's response to Area of Inquiry 2. Subject to and limited by the foregoing objections, Honeywell has produced documents responsive to this request under separate cover.

4. All printed material, including brochures, pamphlets, catalogues, packaging or other written material of any kind or character containing any warnings concerning the possibility of injury to family/household members of workers resulting from the use of asbestos-containing products.

Response: Objection, overbroad, unduly burdensome, and seeks information which is neither relevant nor calculated to lead to the discovery of admissible evidence in that, among other things, it is not limited to the relevant time period or to the friction products to which exposure is alleged. Honeywell further objects that this Document Request is irrelevant to the extent it seeks information concerning the possibility of injury to family/household members of Honeywell employees in that there are no allegations of injury to family/household members of Honeywell employees resulting from the use of asbestos-containing products in this matter. Additionally, Honeywell objects to this Document Request to the extent it seeks information regarding Bendix manufacturing

facilities and/or Honeywell employees, which is irrelevant information in that the Plaintiff/Plaintiff's decedent was not an employee of Honeywell. The events that occurred in plants during mass production of friction materials bear no equivalence to the conditions experienced by a bystander of an end-user or by an end-user of individual units of finished automotive friction products. Specifically, the potential for exposure to chrysotile asbestos of individuals who work with or around finished asbestos-containing friction components in connection with vehicle maintenance activities is completely different than the potential for exposure of employees working in a friction materials plant, who may have worked in the vicinity of chrysotile asbestos fibers that had not yet been encapsulated in the resin binder matrix of a completed friction product. In addition, Honeywell incorporates herein its Response to Area of Inquiry No. 2. Subject to and limited by these objections, Honeywell has produced documents responsive to this request under separate cover.

5. All documents, books, pamphlets, memoranda, articles or written materials of any kind or character that would indicate that asbestos fibers, when inhaled, can be hazardous to the health of human beings and that have been maintained in the possession of Defendant, or any predecessor or affiliated company.

Response: Objection, overbroad, unduly burdensome, and seeks information which is neither relevant nor calculated to lead to the discovery of admissible evidence in that, among other things, it is not limited to the relevant time period or to the friction products to which exposure is alleged. Honeywell further objects to this request to the extent it suggests that asbestos contained in Bendix asbestos-containing friction products can be hazardous to end-users of Bendix friction products or that Honeywell had a related duty to warn. Honeywell is not aware of, and specifically denies, any causal connection between its asbestos-containing friction products and any of the diseases listed above. Asbestos-containing friction products manufactured by Honeywell contained processed chrysotile asbestos fibers that were encapsulated or locked into the product itself. Together with various friction modifiers and fillers, the asbestos fibers were bound within a resin binder system and then baked at a temperature in excess of 350 degrees Fahrenheit. The heat generated during the braking process converted the processed chrysotile asbestos fiber in friction materials into harmless substances known as forsterite or olivine. Exposure to, or the use of, Honeywell's asbestos-containing friction products did not pose a health hazard. In addition, Honeywell incorporates herein its Response to Area of Inquiry No. 2. Subject to and limited by these objections, Honeywell has produced documents responsive to this request under separate cover.

6. All publications, minutes, circulars, magazines or reports, published, written, or disseminated by any trade organization or association comprised of other manufacturers, miners, marketers, installers and/or sellers of products containing asbestos to which Defendant, its predecessor and/or its members belonged at any time since the formation of the corporation.

Response: Objection, overbroad, unduly burdensome, and seeks information which is neither relevant nor calculated to lead to the discovery of admissible evidence.

7. All documents related in any way to the threshold limit values or maximum allowable concentrations of asbestos dust and total dust provided by the American Conference of Governmental Industrial Hygienists and the Permissible Exposure Limits as provided by OSHA.

Response: Objection, overbroad, unduly burdensome, and seeks information which is neither relevant nor calculated to lead to the discovery of admissible evidence. Additionally, Honeywell objects to this Document Request to the extent it seeks information regarding Bendix manufacturing facilities and/or Honeywell employees, which is irrelevant information in that the Plaintiff/Plaintiff's decedent was not an employee of Honeywell. The events that occurred in plants during mass production of friction materials bear no equivalence to the conditions experienced by a bystander of an end-user or by an end-user of individual units of finished automotive friction products. Specifically, the potential for exposure to chrysotile asbestos of individuals who work with or around finished asbestos-containing friction components in connection with vehicle maintenance activities is completely different than the potential for exposure of employees working in a friction materials plant, who may have worked in the vicinity of chrysotile asbestos fibers that had not yet been encapsulated in the resin binder matrix of a completed friction product. In addition, Honeywell incorporates herein its Response to Area of Inquiry No. 14. The ACGIH has defined the term "threshold limit value" in different ways at different times. Honeywell is unable to determine the precise date on which it first obtained this information. Subject to and limited by these objections, Honeywell has produced documents responsive to this request under separate cover.

8. All documents, written by the Defendant and/or its predecessor that have ever been in the Defendant and/or its predecessor's custody, possession or control, reflecting the minutes of corporate meetings of any kind or nature, whether of boards of directors, committees, departments or otherwise, which reflect or relate to asbestos, asbestos health hazards or asbestos-containing products.

Response: Objection, overbroad, unduly burdensome, and seeks information which is neither relevant nor calculated to lead to the discovery of admissible evidence since, among other things, it is not limited to the relevant time period, the minutes of Honeywell, or the Bendix friction products to which exposure is alleged. Honeywell further objects to this Request for Production to the extent it improperly seeks disclosure of proprietary information, confidential data and privileged communications. Subject to and limited by these objections, there are no minutes that reflect the receipt of warnings concerning any alleged health hazards associated with automotive asbestos-containing friction products.

9. Defendant's Privilege Log identifying each document and thing withheld from production in this case by reason of any claimed privilege.

Response: Honeywell hereby incorporates its objections to document requests 1-8 and 10-46. Subject to and limited by these objections, Honeywell will supplement this production as necessary.

10. All deposition transcripts of any corporate representatives of Defendant taken in connection with asbestos litigation.

Response: Objection, overbroad, unduly burdensome, seeks information which is neither relevant nor calculated to lead to the discovery of admissible evidence in that it seeks information in other cases with allegations regarding other allegedly injured persons, other facts, other time periods, and other products at issue, and to the extent that the Document Request seeks deposition transcripts in cases involving allegations other than alleged exposure to Bendix asbestos-containing automotive friction products. Subject to and limited by these objections, Honeywell has produced under separate cover samples of depositions taken of its corporate representatives in cases in which exposure to Bendix automotive friction products has been alleged.

11. Yearly financial reports of the Defendant and its predecessors since 1927.

Response: Objection, overbroad, unduly burdensome, and seeks information which is neither relevant nor calculated to lead to the discovery of admissible evidence. The Document Request seeks publicly available documents which are easily accessible to the Plaintiff.

12. All Minutes of Board of Directors meetings that reference this lawsuit and/or asbestos litigation in general.

Response: Objection, overbroad, unduly burdensome, and seeks information which is neither relevant nor calculated to lead to the discovery of admissible evidence since, among other things, it is not limited to the relevant time period or to the minutes of Honeywell. Subject to and limited by these objections, there are no responsive documents that discuss this lawsuit.

13. Any and all documents, invoices, sales records, bills of lading, shipping documents, service requests or writing of any kind showing or evidencing that the Defendant sold, supplied, and/or maintained any asbestos-containing products to the following sites:

- a. Landmark Dodge in metropolitan Atlanta, GA
- b. Southlake Ford in metropolitan Atlanta, GA
- c. Harry White Ford in East Point, GA
- d. Ford dealerships in metropolitan Atlanta, GA
- e. Lincoln Mercury dealerships Morrow, GA
- f. Autozone stores in Riverdale, GA and Jonesboro
- g. Volkswagen dealerships metropolitan Atlanta, GA, including Forest Park, A
- h. Pep Boys stores in Riverdale, GA and Jonesboro
- i. Genuine Parts or NAPA store location in or around metropolitan Atlanta, GA, including but not limited to Hapeville, GA; Forest Park, GA, Jonesboro, GA, and Riverdale, GA;

- j. Any other store, outlet, dealership, or other location identified in Plaintiff Clyde Stanley Phillip's testimony, as well as any other fact witness' testimony in this case.

Response: Honeywell incorporates its objections and response to Area of Inquiry #13 herein. Furthermore, Honeywell objects to this Document Request as overbroad, unduly burdensome, and seeks information which is neither relevant nor calculated to lead to the discovery of admissible evidence as there is no evidence in the record that Ms. Phillips was ever exposed to any asbestos from any work Mr. Phillips performed with products supplied by the entities listed in a-j. Subject to and limited by these objections, Honeywell further responds that it has conducted a reasonably diligent search of its available records for information and/or documents regarding the sale or supply of its asbestos-containing automotive friction products to the specific locations identified above during the relevant time period and has located no responsive information and/or documents.

14. Index to any and all journals, articles and/or books in Defendant's library or libraries or collection of materials during the time period from the formation of the corporation to the present, which deal with asbestos, industrial hygiene, medicine, safety, health and/or engineering.

Response: Objection, overbroad, unduly burdensome, and seeks information which is neither relevant nor calculated to lead to the discovery of admissible evidence. Subject to and limited by these objections, Honeywell is not aware of any such document.

15. The corporate structure and policy concerning the subject of worker safety in the design, development, manufacture, testing, installation, removal and use of asbestos products from the formation of the corporation to the present.

Response: Objection, unintelligible as #15 is not a document request. Honeywell further objects as overbroad, unduly burdensome, and seeks information which is neither relevant nor calculated to lead to the discovery of admissible evidence. Additionally, Honeywell objects to this request to the extent it seeks information regarding Bendix manufacturing facilities and/or Honeywell employees, which is irrelevant information in that the Plaintiff/Plaintiff's decedent was not an employee of Honeywell. The events that occurred in plants during mass production of friction materials bear no equivalence to the conditions experienced by a bystander of an end-user or by an end-user of individual units of finished automotive friction products. Specifically, the potential for exposure to chrysotile asbestos of individuals who work with or around finished asbestos-containing friction components in connection with vehicle maintenance activities is completely different than the potential for exposure of employees working in a friction materials plant, who may have worked in the vicinity of chrysotile asbestos fibers that had not yet been encapsulated in the resin binder matrix of a completed friction product. Finally, Honeywell further objects to this request to the extent it suggests that asbestos contained in Bendix asbestos-containing friction products can be hazardous to end-users of Bendix friction products or that Honeywell had a related duty to warn. Honeywell is not aware of,

and specifically denies, any causal connection between its asbestos-containing friction products and any of the diseases listed above. Asbestos-containing friction products manufactured by Honeywell contained processed chrysotile asbestos fibers that were *encapsulated or locked into the product itself*. Together with various friction modifiers and fillers, the asbestos fibers were bound within a resin binder system and then baked at a temperature in excess of 350 degrees Fahrenheit. The heat generated during the braking process converted the processed chrysotile asbestos fiber in friction materials into harmless substances known as forsterite or olivine. Exposure to, or the use of, Honeywell's asbestos-containing friction products did not pose a health hazard.

16. The corporate structure concerning medical directors, industrial hygienists, physicians, biological scientists or consultants in these fields from 1930 to the present, including the name, title, duties, responsibilities, period of employment, to whom the individual reported, the current or last known business and residential address of each medical director, industrial hygienist, physician, biological scientist or consultant for Defendant, the location, identifying titles or codes, and custodians of all reports or memoranda written by each, the professional specialization of each, the reason for hiring each such person and the name and address of the person in responsible for hiring each such person.

Response: Objection, unintelligible as #16 is not a document request. Honeywell further objects as overbroad, unduly burdensome, and seeks information which is neither relevant nor calculated to lead to the discovery of admissible evidence.

17. Any film, video, movie or tape (hereinafter "film") whose subjects included asbestos, asbestos-containing products, asbestos and health, methods of asbestos product application, or removal, recommended practices for asbestos product use or warnings concerning asbestos inhalation.

Response: Objection, overbroad, unduly burdensome, and seeks information which is neither relevant nor calculated to lead to the discovery of admissible evidence. Additionally, Honeywell objects to this request to the extent it seeks information regarding Bendix manufacturing facilities and/or Honeywell employees, which is irrelevant information in that the Plaintiff/Plaintiff's decedent was not an employee of Honeywell. The events that occurred in plants during mass production of friction materials bear no equivalence to the conditions experienced by a bystander of an end-user or by an end-user of individual units of finished automotive friction products. Specifically, the potential for exposure to chrysotile asbestos of individuals who work with or around finished asbestos-containing friction components in connection with vehicle maintenance activities is completely different than the potential for exposure of employees working in a friction materials plant, who may have worked in the vicinity of chrysotile asbestos fibers that had not yet been encapsulated in the resin binder matrix of a completed friction product.

18. Written memoranda, specifications, blueprints, catalogs, owner's manuals, service manuals, or other written materials of any kind or character relating to the design, preparation, use, installation, maintenance or removal of any asbestos products, products or machines which contained asbestos-containing products as a component part which were manufactured, sold,

supplied, disturbed, installed and/or removed by Defendant at any and each of the jobsites identified in item #13 above.

Response: Honeywell incorporates its objection and response to Area of Inquiry #13 herein. Honeywell further objects as overbroad, unduly burdensome, and seeks information which is neither relevant nor calculated to lead to the discovery of admissible evidence. Additionally, Honeywell objects to this Document Request due to its compound nature and the resulting inability to understand the scope of the documents requested. Honeywell objects to this Document Request to the extent that it seeks documents pertaining to asbestos-containing products other than the friction products to which exposure is alleged. Honeywell further objects to this Request to the extent that it suggests that any Honeywell asbestos-containing product was subject to repair, maintenance, removal and/or replacement at the sites identified as 1-9 in item # 13 above or that Bendix asbestos containing products were manufactured, sold, supplied by Defendant or any other person at the sites identified as 1-9 in item #13 above as there has been no such testimony in this matter. Subject to and limited by these objections, Honeywell has produced documents responsive to this request under separate cover.

19. Written memoranda, specifications blueprints, catalogs, owner's manuals, service manuals or other written materials of any kind or character indicating whether Defendant made any recommendations as to the work practices that should be used during the removal and/or replacement of asbestos, or asbestos-containing component parts on Defendant's products, at the sites identified in item #13 above.

Response: Honeywell incorporates its objections and response to Area of Inquiry #13 herein. Honeywell further objects as overbroad, unduly burdensome, and seeks information which is neither relevant nor calculated to lead to the discovery of admissible evidence since, among other things, it is not limited to the relevant time period. Honeywell also objects to this request to the extent that it seeks documents pertaining to asbestos-containing products other than the friction products to which exposure is alleged. Honeywell further objects to this Request to the extent that it suggests that any Honeywell asbestos-containing product was subject to repair, maintenance, removal and/or replacement at the sites identified as 1-9 in item # 13 above or that Bendix asbestos containing products were manufactured, sold, supplied by Defendant or any other person at the sites identified as 1-9 in item #13 above as there has been no such testimony in this matter. Subject to and limited by these objections, Honeywell has produced documents responsive to this request under separate cover.

20. Written memoranda, specifications blueprints, catalogs, owner's manuals, service manuals or other written materials of any kind or character indicating whether Defendant made any recommendations as to respiratory protection that should be used during the removal and/or replacement of asbestos on Defendant's products at the sites identified in #13 above.

Response: Honeywell incorporates its objections and response to Area of Inquiry #13 herein. Honeywell further objects as overbroad, unduly burdensome, and seeks information which is neither relevant nor calculated to lead to the discovery of admissible

evidence since, among other things, it is not limited to the relevant time period. Honeywell also objects to this request to the extent that it seeks documents pertaining to asbestos-containing products other than the friction products to which exposure is alleged. Honeywell further objects to this Request to the extent that it suggests that any Honeywell asbestos-containing product was subject to repair, maintenance, removal and/or replacement at the sites identified as 1-9 in item # 13 above or that Bendix asbestos containing products were manufactured, sold, supplied by Defendant or any other person at the sites identified as 1-9 in item #13 above as there has been no such testimony in this matter. Subject to and limited by these objections, Honeywell has produced documents responsive to this request under separate cover.

21. Written memoranda, specifications blueprints, catalogs, owner's manuals, service manuals or other written materials of any kind or character indicating whether the defendant made any recommendations as to the protection of household/family members of workers at the sites identified in item #13 above.

Response: Honeywell incorporates its objections and response to Area of Inquiry #13 herein. Honeywell further objects as overbroad, unduly burdensome, and seeks *information which is neither relevant nor calculated to lead to the discovery of admissible evidence* since, among other things, it is not limited to the relevant time period. Honeywell also objects to this request to the extent that it seeks documents pertaining to asbestos-containing products other than the friction products to which exposure is alleged. Honeywell further objects to this Request to the extent that it suggests that any Honeywell asbestos-containing product was subject to repair, maintenance, removal and/or replacement at the sites identified as 1-9 in item # 13 above or that Bendix asbestos containing products were manufactured, sold, supplied by Defendant or any other person at the sites identified as 1-9 in item #13 above as there has been no such testimony in this matter. Finally, Honeywell further objects to this request to the extent it suggests that asbestos contained in Bendix asbestos-containing friction products can be hazardous to end-users of Bendix friction products or that Honeywell had a related duty to warn. Honeywell is not aware of, and specifically denies, any causal connection between its asbestos-containing friction products and any of the diseases listed above. Asbestos-containing friction products manufactured by Honeywell contained processed chrysotile asbestos fibers that were encapsulated or locked into the product itself. Together with various friction modifiers and fillers, the asbestos fibers were bound within a resin binder system and then baked at a temperature in excess of 350 degrees Fahrenheit. The heat generated during the braking process converted the processed chrysotile asbestos fiber in friction materials into harmless substances known as forsterite or olivine. Exposure to, or the use of, Honeywell's asbestos-containing friction products did not pose a health hazard. Subject to and limited by these objections, Honeywell has produced documents responsive to this request under separate cover.

22. Written memoranda, specifications blueprints, catalogs, owner's manuals, service manuals, invoices, sales documents, purchase orders or other written materials of any kind or character indicating identity of any and all suppliers who supplied asbestos containing products

and/or component parts to Defendant for use in its products and/or equipment at the sites identified in item #13 above.

Response: Honeywell incorporates its objections and response to Area of Inquiry #13 herein. Honeywell further objects as overbroad, unduly burdensome, and seeks information which is neither relevant nor calculated to lead to the discovery of admissible evidence since, among other things, it is not limited to the relevant time period. Honeywell also objects to this request to the extent that it seeks documents pertaining to asbestos-containing products other than the friction products to which exposure is alleged. Subject to and limited by the foregoing objections, the suppliers of raw asbestos for Honeywell in connection with the manufacture of friction products were as follows:

Bell Asbestos Mines Ltd.
1973 to 1983

Canadian Johns-Manville Ltd. or
JM Asbestos Sales, Inc.
1939 to 2001

Lake Asbestos (Lac d'Amiante du Quebec L'tee.)
1960 to 1986

The Ruberoid Co.
1939 to 1975

Vermont Asbestos Group
1975 to 2001

23. All documentation or other tangible things pertaining to George Webber.

Response: Objection, not applicable in this matter.

24. All documentation pertaining to Defendant's knowledge of the hazards of asbestos, the manner in which Defendant became aware of such hazards, and the extent of Defendant's knowledge of such hazards, including but not limited to the hazards to individuals who install, remove, cut, saw, abrade, maintain, replace or otherwise work with asbestos containing materials used in Defendant's products.

Response: Objection, vague, overbroad, unduly burdensome, and seeks information which is neither relevant nor calculated to lead to the discovery of admissible evidence since, among other things, it is not limited to the relevant time period, the Bendix products to which exposure is alleged, or the disease alleged in this case. Honeywell further objects to this Request to the extent that it suggests that any Honeywell asbestos-containing product was subject to repair, maintenance, removal and/or replacement at the sites identified as 1-9 in item # 13 above or that Bendix asbestos containing products were manufactured, sold, supplied by Defendant or any other person at the sites identified as 1-9

in item #13 above as there has been no such testimony in this matter. Additionally, Honeywell objects to this Document Request to the extent it seeks information regarding Bendix manufacturing facilities and/or Honeywell employees, which is irrelevant information in that the Plaintiff/Plaintiff's decedent was not an employee of Honeywell. The events that occurred in plants during mass production of friction materials bear no equivalence to the conditions experienced by a bystander of an end-user or by an end-user of individual units of finished automotive friction products. Specifically, the potential for exposure to chrysotile asbestos of individuals who work with or around finished asbestos-containing friction components in connection with vehicle maintenance activities is completely different than the potential for exposure of employees working in a friction materials plant, who may have worked in the vicinity of chrysotile asbestos fibers that had not yet been encapsulated in the resin binder matrix of a completed friction product. Finally, Honeywell further objects to this Document Request to the extent it suggests that asbestos contained in Bendix asbestos-containing friction products can be hazardous to end-users of Bendix friction products or that Honeywell had a related duty to warn. Honeywell is not aware of, and specifically denies, any causal connection between its asbestos-containing friction products and any of the diseases listed above. Asbestos-containing friction products manufactured by Honeywell contained processed chrysotile asbestos fibers that were encapsulated or locked into the product itself. Together with various friction modifiers and fillers, the asbestos fibers were bound within a resin binder system and then baked at a temperature in excess of 350 degrees Fahrenheit. The heat generated during the braking process converted the processed chrysotile asbestos fiber in friction materials into harmless substances known as forsterite or olivine. Exposure to, or the use of, Honeywell's asbestos-containing friction products did not pose a health hazard. Subject to and without waiving these objections, Honeywell incorporates herein its Response to Area of Inquiry No. 4. Subject to and limited by these objections, Honeywell has produced documents responsive to this request under separate cover.

25. All documentation pertaining to the asbestos content of any and all asbestos-containing materials used in the manufacture and construction of Defendant's products.

- a. any decisions Defendant may have made to reduce, alter, or eliminate the asbestos content of such materials, component or external parts;
- b. any decisions Defendant may have made to halt the purchase of asbestos-containing component and/or external parts.

Response: Objection, vague, overbroad, unduly burdensome, and seeks information which is neither relevant nor calculated to lead to the discovery of admissible evidence since, among other things, it is not limited to the relevant time period, the Bendix products to which exposure is alleged, or the disease alleged in this case. Subject to and limited by these objections, Honeywell has produced documents responsive to this request under separate cover.

26. Produce and Authenticate all of the Material Safety Data Sheets created for all asbestos containing friction materials manufactured, distributed, sold, used, and/or specified by

Defendant and its successors and predecessors, and provide a witness qualified to discuss the creation of the Material Safety Data Sheets.

Response: Objection to the extent this is more than a Document Request. Furthermore, Honeywell objects to this document Request as overbroad, unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence. Honeywell further objects to this Document Request as it is not limited to the relevant time period or the Bendix products to which exposure is alleged, or the allegations in this matter. Subject to and limited by these objections, Honeywell has produced documents responsive to this request under separate cover.

27. All documentation pertaining to tests conducted by Defendant concerning the release of asbestos fibers associated with the installation, removal, cutting, sawing, abrading, maintenance, replacement or otherwise working with asbestos-containing materials used in the manufacture and construction of Defendant's products.

Response: Objection, overbroad, unduly burdensome, and seeks information which is neither relevant nor calculated to lead to the discovery of admissible evidence since, among other things, it is not limited to the relevant time period, the Bendix products to which exposure is alleged, or the disease alleged in this case. Additionally, Honeywell objects to this Document Request to the extent it seeks information regarding Bendix manufacturing facilities and/or Honeywell employees, which is irrelevant information in that the Plaintiff/Plaintiff's decedent was not an employee of Honeywell. The events that occurred in plants during mass production of friction materials bear no equivalence to the conditions experienced by a bystander of an end-user or by an end-user of individual units of finished automotive friction products. Specifically, the potential for exposure to chrysotile asbestos of individuals who work with or around finished asbestos-containing friction components in connection with vehicle maintenance activities is completely different than the potential for exposure of employees working in a friction materials plant, who may have worked in the vicinity of chrysotile asbestos fibers that had not yet been encapsulated in the resin binder matrix of a completed friction product. Subject to and limited by these objections, Honeywell has produced documents responsive to this request under separate cover.

28. All documentation pertaining to the existence, extent, type, organization, filing system, method of access or retrieval, and/or location of Defendant's hard copy documents or computerized records or other records pertaining to the subject matter areas described in paragraphs two through seven, above, that were created, maintained or stored by electronic and/or magnetic means, including but not limited to records that have been microfilmed, microfiched, imaged, scanned, or stored on tapes, disks, diskettes, CD-ROM, etc. or on or within any computer hardware, backup system, download system, file dumping or other system of information management, whether on-site or off-site.

Response: Objection, overbroad, unduly burdensome, and is not reasonably calculated to lead to the discovery of admissible evidence. Honeywell further objects to this Document Request to the extent it improperly seeks disclosure of proprietary information,

confidential data and privileged communications. Honeywell further states that its document retention policy is not relevant to the subject matter involved in the action currently pending.

29. Any and all documents and other tangible things which refer to the document retention (and/or destruction) policy of Defendant, including the following:

- a. Any document retention and/or destruction policies for Defendant that pertain to documents and records, including but not limited to supplements, addenda, memoranda, operating bulletins, revisions, or any other superseding instructions that referred to the stopping, suspending or resuming of such retention or destruction policies;
- b. Any record retention and/or destruction, dumping, or purging policies for Defendant that pertain to documents and records created, maintained or stored by electronic and/or magnetic means, including but not limited to records that have been microfilmed, microfiched, imaged, scanned, or stored on tapes, disks, diskettes, CD-ROM, databases, etc. or on or within any computer hardware, backup system, download system, file dumping or other system of information management, whether on-site or off-site, including but not limited to supplements, addenda, memoranda, operating bulletins, revisions, or any other superseding instructions that referred to the stopping, suspending or resuming of such retention or destruction policies.

Response: Objection, overbroad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving this objection, Honeywell states that its document retention policy and other requested information are not relevant to the subject matter involved in the action currently pending. Subject to and limited by these objections, Honeywell has produced documents responsive to this request under separate cover.

30. Any and all documentation, including but not limited to lists, inventories, indices, databases or print-outs thereof, archives, storage inventories, logs, or other search aids that refer or relate to the existence, extent, type, organization, filing system, method of access or retrieval, and/or location of Defendant's documents (maintained or stored on-site or off-site) described in the preceding paragraphs.

Response: Objection, overbroad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence. Honeywell further objects to this Document Request to the extent it improperly seeks disclosure of proprietary information, confidential data and privileged communications. Subject to and without waiving this objection, Honeywell states that the requested information is not relevant to the subject matter involved in the action currently pending.

31. Your current resume or Curriculum Vitae.

Response: Responsive documents have been produced under separate cover.

32. Any and all documentation which reflects or relates in any way to any other inquiry or research conducted by you or at your request or direction in anticipation of or in the preparation of your deposition.

Response: Objection, vague, ambiguous, overbroad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence. Honeywell further objects to this Document Request to the extent it improperly seeks disclosure of proprietary information, confidential data and privileged communications.

33. Any other documentation of any nature that constitutes, reflects, comprises, pertains, describes or relates in any way to any other document or source of information (including individuals) you relied on in preparing for your deposition.

Response: Objection, vague, ambiguous, overbroad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence. Honeywell further objects to this Document Request to the extent it improperly seeks disclosure of proprietary information, confidential data and privileged communications.

34. Any other documentation (not otherwise produced in response to a foregoing paragraph) that you reviewed in preparation for your deposition.

Response: Objection, vague, ambiguous, overbroad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence. Honeywell further objects to this Document Request to the extent it improperly seeks disclosure of proprietary information, confidential data and privileged communications. Subject to and limited by these objections, Honeywell has produced documents responsive to this request under separate cover.

35. Any and all documentation, including but not limited to notes, correspondence, memoranda, tapes or transcriptions thereof, computerized information, minutes of meetings, or other documentation which reflects or relates in any way to conferences, meetings, or conversations you had with any individual or entity during which you prepared for or otherwise discussed this deposition.

Response: Objection, vague, ambiguous, overbroad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence. Honeywell further objects to this Document Request to the extent it improperly seeks disclosure of proprietary information, confidential data and privileged communications.

36. Your entire file regarding this case.

Response: Objection, vague, ambiguous, overbroad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence. Honeywell further

objects to this Document Request to the extent it improperly seeks disclosure of proprietary information, confidential data and privileged communications.

37. All factual materials, including all writings, documents or information of any type provided to the deponent concerning any issues, allegations or other matters relating to this case.

Response: Objection, vague, ambiguous, overbroad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence. Honeywell further objects to this Document Request to the extent it improperly seeks disclosure of proprietary information, confidential data and privileged communications. Subject to and limited by these objections, Honeywell has produced documents responsive to this request under separate cover.

38. Any documents upon which you will rely to offer any opinions regarding this case.

Response: Objection, overbroad and unduly burdensome. To be provided in conformity with rules of court or the Scheduling Order in this litigation.

39. Any materials which you prepared in conjunction with this lawsuit about which you will testify in this litigation.

Response: Objection, overbroad and unduly burdensome. To be provided in conformity with rules of court or the Scheduling Order in this litigation.

40. A list of all cases in which the deponent has testified, either at trial or in deposition.

Response: Objection, vague, ambiguous, overbroad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence. Honeywell further objects to this Document Request as it is not limited to the relevant time period or the Bendix products to which exposure is alleged, or the allegations in this matter and to the extent that the Document Request seeks information about cases involving allegations other than alleged exposure to Bendix asbestos-containing automotive friction products. Subject to and limited by these objections, Honeywell has produced documents responsive to this request under separate cover.

41. All drawings, charts, exhibits, photographs, or videotapes made by the deponent or on the deponent's behalf, given to the deponent, or considered by the deponent with regard to this case or any test or study relevant to this case.

Response: To be provided in conformity with rules of court or the Scheduling Order in this litigation.

42. Copies of any power point presentations, overheads, or other exhibits the deponent intends to use at the trial of this matter.

Response: To be provided in conformity with rules of court or the Scheduling Order in this litigation.

43. All documents related to Defendant's corporate stewardship program throughout the corporation's history, including but not limited to policies aimed to prevent contamination of the environment with hazardous materials, testing of products, and safe design.

Response: Objection, overbroad, unduly burdensome, and seeks information which is neither relevant nor calculated to lead to the discovery of admissible evidence. Honeywell further objects to this Document Request as it is not limited to the relevant time period or the Bendix products to which exposure is alleged, or the allegations in this matter. Honeywell further objects and states that any corporate stewardship program as defined above is not relevant to the subject matter involved in the action currently pending. Such information is inadmissible at trial and inquiry into such information is not reasonably calculated to lead to the discovery of admissible evidence. Subject to and limited by these objections, Honeywell has produced documents responsive to this request under separate cover.

44. All documents related to Defendant's hiring of Drs. Victor Roggli, Gary Marsh and Ada Youk for work on Marsh et al., *Asbestos fiber concentrations in the lungs of brake repair workers: commercial amphiboles levels are predictive of chrysotile levels* Inhalation Toxicology, 2011; 23(12): 681-688 and any other publications supported in any way by Defendant, its agents and/or its counsel. This request includes all communications between the consultants and counsel and/or their agents, all records of payment, all electronic versions of materials exchanged between Defendant, counsel, of Drs. Victor Roggli, Gary Marsh, Ada Youk and/or any agent of any person mentioned herein, all raw data, all slides, count sheets, notes, and or other materials which relate to any work relating to asbestos.

Response: Objection, overbroad, unduly burdensome, and seeks information which is neither relevant nor calculated to lead to the discovery of admissible evidence since, among other things, it is not limited to the relevant time period, the Bendix products to which exposure is alleged, and there is no allegation that Ms. Phillips is or was a brake repair worker. Furthermore, Honeywell objects to this request on the grounds that it improperly seeks documentation from Honeywell regarding Dr. Victor Roggli, Dr. Gary Marsh, and Dr. Ada O. Youk. Drs. Roggli, Marsh, and Youk are not employees or officers of Honeywell and, therefore, are not witnesses that Honeywell controls. Thus, any documentation sought by Plaintiff about Dr. Roggli, Dr. Marsh, or Dr. Youk, or any documents in the care, custody or control of Drs. Roggli, Marsh and Youk, are not in Honeywell's care, custody or control. If Plaintiff seeks documents or other data from Drs. Roggli, Marsh, Youk, the proper method of discovery is to depose those individuals through Plaintiff's third party practice or by agreement of counsel in this case. Doing so would be more convenient, less burdensome, and less expensive than deposing Honeywell's corporate designee on issues better addressed by these witnesses. To the extent that Dr. Roggli has been retained by Honeywell in this matter, Dr. Roggli and Honeywell has or will

comply with the Georgia Rules of Civil Procedure and any expert related deadlines and requirements outlined in the scheduling order in this matter.

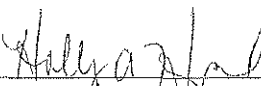
[45. All documents related to Defendant's retention or payment of/for the services of any individual, entity or company to study, research, and/or author reports or articles concerning asbestos, asbestos-related diseases, lung cancer and/or mesothelioma.

Response: Honeywell objects to this request as overly broad, unduly burdensome, and vague, and because it seeks information that is neither relevant nor likely to lead to the discovery of admissible evidence. Honeywell further objects to the extent the request seeks documents that are attorney work product, attorney-client privileged, or subject to any other privilege.

46. Sale of asbestos containing friction materials to Ford Motor Company for use as OEM equipment (and replacement parts) in newly manufactured Ford cars, light trucks, heavy trucks, industrial/construction tractors and farm tractors.

Response: Objection, this request is unintelligible as it is not formulated as a request for documents. Honeywell further object to this request because it is overbroad, unduly burdensome, and seeks information which is neither relevant nor calculated to lead to the discovery of admissible evidence since, among other things, it is not limited to the relevant time period, the relevant vehicles, and the Bendix products to which exposure is alleged. Subject to and limited by these objections, Honeywell has produced under separate cover documents pertaining to the sale of friction products that could have been used as original equipment on the 1979 Ford Mustang as well as other vehicles. Honeywell has no information to indicate that the products referenced in such documents were used as original equipment on the 1979 Ford Mustang. Honeywell has identified no documents evidencing the sale of asbestos-containing friction materials for use as original equipment on the 1982 Ford F-150 or replacement parts on the 1987 Ford Aerostar.

This 5th day of February, 2013.



HOLLY A. HEMPEL

Georgia Bar No. 345070

LEE ANN ANAND

Georgia Bar No. 004922

Attorneys for Honeywell International Inc.

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(404) 322-6000

CLYDE STANLEY PHILLIPS,)
individually and in his capacity as)
Executor of the Estate of CHRISTINNA)
PHILLIPS, Deceased,)

CIVIL ACTION FILE

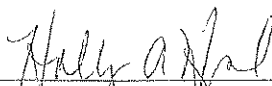
NO. 2012CV00804-5

Defendants.

I hereby certify that I have this day served the within and foregoing **Responses and Objections by Honeywell International Inc. to Plaintiff's Third Amended Notice to Take Rule 30(b)(6) Video Deposition and Notice to Produce to Honeywell International Inc.** via electronic mail, with an offer to send by First-Class Mail, to Plaintiff's counsel listed below and to all known defense counsel of record in this matter:

Christian Hartley, Esq.
Maune Raichle Hartley French & Mudd LLC
300 West Coleman Blvd, Suite 200
Mount Pleasant, South Carolina 29464

This 5th day of February, 2013.



HOLLY A. HEMPEL
Georgia Bar No. 345070
Attorneys for Honeywell International Inc.

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