

1 1.15 During the period of time from 1940 to the present,
2 were any sales materials prepared by defendant or its agents for
3 the purposes of marketing or advertising defendant's asbestos or
4 asbestos-containing products anywhere in the United States?
5

6 ANSWER: Yes.
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10 1.16 If your answer to the preceding interrogatory is in
11 the affirmative, state:
12

- 13 (a) The name and address of each person or entity
who prepared the same;
14 (b) The name, address and job title of each person
who presently has possession of same;
15 (c) The date same was prepared;
16 (d) The media used to disseminate the sales
17 material. Specify the names of the magazines,
trade publications, catalogs, trade shows and/or
18 sales staff involved in the dissemination;
19 (e) State whether any of the materials referred to
20 in your answer to this interrogatory were
mailed, circulated, distributed or otherwise
21 made available in the State of Washington during
the Relevant Times.
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