

one of their components. Because plaintiff has failed to identify exposure to any asbestos-containing products of this defendant, this interrogatory is objected to on the grounds that it lacks relevance to this case and is not reasonably calculated to lead to the discovery of admissible evidence. All other grounds for objection are reserved pending possible future product identification.

8. With respect to each asbestos product referred to in Answer No. 7, or which were sold to any other defendant in this action, state:

a. The full description of each product including the color, physical characteristics, and appearance of each product.

b. The intended use of the product.

c. The reasons why asbestos was used as an ingredient in each such product.

d. Does the asbestos product have to be cut, sawed, shaped, mixed, or otherwise worked before or during application or use? If so, describe what the user had to do before applying and using the product.

e. The form in which the product is sold, e.g., bags, drums, boxes, size, color(s), writing thereon, etc.

f. If said packaging was changed at any time, when was the packaging changed?

g. The form in which the product is sold after the change in packaging, e.g., bags, drums, boxes, size, color(s), writing thereon, etc.

h. All other names under which the product was sold.

i. The number and date of each patent or patent application as to the product.

j. If the product continued to be produced after the deletion of asbestos, all reasons why the asbestos was deleted; the identity of the person who made the decision to delete the asbestos; and the date the product was first produced without the asbestos.