

RECEIVED

FEB - 6 1991

PLAINTIFF'S  
EXHIBIT  
CHR-121

1 John E. Dittoe  
J. David Bickham  
2 CROSBY, HEAFEY, ROACH & MAY  
Professional Corporation  
3 1999 Harrison Street  
Oakland, CA 94612  
4 (415) 763-2000

5 Attorneys for Defendant  
Chrysler Corporation  
6  
7

8 SUPERIOR COURT OF CALIFORNIA - COUNTY OF SOLANO  
9

10 IN RE: SOLANO COUNTY COMPLEX  
ASBESTOS LITIGATION

No. 2830

11  
12  
13 DEFENDANT CHRYSLER CORPORATION'S  
FURTHER RESPONSE TO PLAINTIFFS' STANDARD  
14 INTERROGATORIES TO DEFENDANT PURSUANT TO GENERAL ORDER 30.00  
15

16 PROPOUNDING PARTY: Plaintiffs

17 RESPONDING PARTY : Defendant Chrysler Corporation

18 SET NUMBER : One  
19

20 Without waiving any of the general or specific objections  
21 stated in its original response, defendant Chrysler Corporation  
22 (Chrysler) provides the following further response to plaintiffs'  
23 interrogatories, both for itself and as success in interest to  
24 American Motors Corporation (AMC):  
25  
26

////

////

FURTHER RESPONSE TO INTERROGATORY NO. 34: Yes.

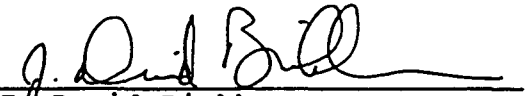
(a) Unknown, except for those documents previously produced. Discovery and investigation are continuing.

(b) Not applicable.

DATED: February 4, 1991.

CROSBY, HEAFEY, ROACH & MAY  
Professional Corporation

By

  
J. David Bickham  
Attorneys for Defendant  
Chrysler Corporation

1 PROOF OF SERVICE BY MAIL

(1013,2015.5 C.C.P.)

2  
3 I am a citizen of the United States and a resident of Contra Costa County. I am over  
4 the age of eighteen years and not a party to the within action; my business address is 1999 Harrison Street,  
5 Oakland, California 94612. On February 5, , 19 91 , I served the within

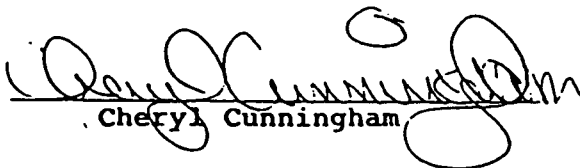
6  
7 **DEFENDANT CHRYSLER CORPORATION'S FURTHER RESPONSE**  
8 **TO PLAINTIFFS' STANDARD INTERROGATORIES TO DEFENDANT**  
9 **PURSUANT TO GENERAL ORDER 30.00**

10 in said action by placing a true copy thereof enclosed in a sealed envelope with postage thereon fully pre-  
11 paid, in the United States mail at Oakland, Alameda County, California, addressed as follows:

12 **PLEASE SEE ATTACHED LIST**  
13  
14  
15  
16  
17  
18  
19  
20  
21

22 I declare under penalty of perjury that the above is true and correct.

23 Executed on February 5, 1991 at Oakland, California

24  
25   
26 Cheryl Cunningham