

RESPONSE:

See Responses to Request for Production Nos. 5 and 6, which are incorporated herein as if fully rewritten. Defendant objects to this request and Request No. 8 as overly broad and unduly burdensome because it requests any document referring to asbestos. If this request is interpreted this broadly, there is no need for many of the other requests for production propounded by Plaintiffs as they would be covered under this single request. Because it is too broad, every document produced is also applicable either to this Request or Request No. 8. Subject to and without waiving objections, other documents responsive to this Request are labeled Warner SBC-24-000001-001443.

REQUEST NO. 8:

Any and all writings or documents of any nature whatsoever in the possession of this Defendant, any predecessor or related company referring, reflecting, concerning or relating to asbestos and/or the potential health effects of asbestos regardless of whether the author or authors were employees, agents, officers, directors or consultants of the Defendant, any predecessor or related companies.

RESPONSE:

See Responses to Request for Production Nos. 5 and 6, which are incorporated herein as if fully rewritten. Defendant objects to this request and Request No. 7 as overly broad and unduly burdensome because it requests any document referring to asbestos. If this request is interpreted this broadly, there is no need for many of the other requests for production