

SUPREME COURT OF THE STATE OF NEW YORK
EIGHTH JUDICIAL DISTRICT

In. Re: Eighth Judicial District
Asbestos Litigation

EIGHTH JUDICIAL DISTRICT
ASBESTOS LITIGATION

This Document Applies to:

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF ERIE

MICHAEL JOSEPH KOLASINSKI

Plaintiff,

vs.

EATON CORPORATION
RESPONSES TO PLAINTIFFS'
INTERROGATORIES

ACME LIQUIDATING CORP., successor in interest to
LIPE AUTOMATION CORP. f/k/a LIPE-ROLLWAY
TECHNOLOGY, INC., et al.,

Index No. 2008-405

Defendants.

EATON'S RESPONSES TO PLAINTIFFS' INTERROGATORIES

Comes now Defendant, Eaton Corporation, on behalf of its current and former business operations known as Truck Components Operations and on behalf of no other entity, and provides the following Objections and Responses to Plaintiff's Interrogatories and Requests for Production of Documents:

1. Overly Broad, Undue Burden - Scope and Time. Eaton objects to the definitions, instructions and individual requests seeking information concerning products other than those to which Plaintiff alleges exposure. Eaton objects to providing information concerning divisions or business units other than those involved with the product or products to which Plaintiff alleges exposure. Requests seeking such information are overly broad and unduly burdensome, oppressive, and not reasonably limited to scope or time. Eaton states that it has manufactured a wide array of highly engineered products for nearly a century. As such, attempting to determine every activity engaged in by every such business would be extraordinarily and unreasonably difficult. For these reasons, Eaton will only incur the burden and expense of obtaining information which pertains to products manufactured by Eaton's current and former business