

(c) Identify any and all documents upon which you base your cross-claim for indemnity.

Ans. Objection. The court record in this lawsuit speaks for itself as to cross-claims.


Objecting Attorney

110. Are you aware that other co-defendants prior to 1972 had actual knowledge of the dangers or hazards of asbestos dust?

Ans. No

111. If your answer to the above interrogatory is anything other than an unequivocal "no", state all information you possess as to any other co-defendant's actual knowledge of the danger or hazards of asbestos dust.

(a) Identify all documents you possess that any other co-defendant had actual knowledge of the dangers or hazards of asbestos.

Ans. N/A

112. Have you settled any cross-claim for indemnity, or reached an agreement or tentative agreement concerning your cross-claims for indemnity with any other co-defendant? If so, state with whom you have settled or reached such an agreement.

Ans. Objection. This Interrogatory is irrelevant as to any matter involved in this lawsuit.


Objecting Attorney

113. Have you agreed with any co-defendant not to settle with Plaintiffs in any asbestos cases in the above-captioned court? If so, state which co-defendants you have agreed with and the Civil Number of each case you have agreed not to settle.

Ans. Objection. This Interrogatory is irrelevant as to any matter involved in this lawsuit.


Objecting Attorney