

1 RESPONSE TO INTERROGATORY NO. 102:

2 None.

3 INTERROGATORY NO. 103:

4 Please state when the first claim for Workers' Compensa-
5 tion was filed by any of defendant's automobile repair employ-
6 ees or factory workers in which it was alleged that said claim-
7 ant had developed:

8 (a) Asbestosis;

9 (b) Lung cancer;

10 (c) Mesothelioma

11 For each such claimant, list the date the claim was filed, the
12 claimant's name and the state in which the claim was filed.

13 RESPONSE TO INTERROGATORY NO. 103:

14 See Wagner's response to Interrogatory No. 47.

15 INTERROGATORY NO. 104:

16 Please state whether the defendant entered into any
17 agreements with any British or German concerns which manufac-
18 tured asbestos-containing products from 1930 to 1972.

19 RESPONSE TO INTERROGATORY NO. 104:

20 No.

21 INTERROGATORY NO. 105:

22 If the answer to the above interrogatory is affirma-
23 tive, please list:

24 (a) The name, address and phone number of each
25 such British or German concern;

26 (b) The year the agreement was entered into and
27 the date said agreement terminated;

28 (c) The products exchanged or involved in said
agreement, including:

(i) The percent composition of asbestos;

(ii) The intended use of the products;

(iii) Whether the products were marketed in
the United States