

- (e) the placement of warnings or cautions with respect to asbestos containing brake shoes or linings;
- (f) the decision, need, feasibility or desirability of discontinuing the use of asbestos containing brake shoes or linings;
- (g) forsterite and brake linings or shoes;
- (h) the custodian of business records;
- (i) the answering defendants knowledge of the historical scientific and medical knowledge of the health implications of exposure to asbestos;
- (j) as an industrial hygienist of the answering defendant relating to asbestos containing products including but not limited to brake shoes and linings;
- (k) as an manager of product safety of the answering defendant relating to asbestos containing products including but not limited to brake shoes and linings;
- (l) as a plant safety manager of product safety of the answering defendant relating to asbestos containing products including but not limited to brake shoes and linings;
- (m) as a director of Environmental Safety of the answering defendant relating to asbestos containing products including but not limited to brake shoes and linings ;
- (n) as a plant physician of the answering defendant relating to asbestos containing products including but not limited to brake shoes and linings and the health of the defendants employees;
- (o) sales personnel who were responsible for making sales calls or servicing accounts in Western New York (defined as Allegany, Cattaraugus, Chautauqua, Erie, Genesee, Orleans, Niagara, Wyoming, Monroe, Wayne, Livingston and Ontario Counties

**ANSWER:**

Overbroad, calculated to harass. Without waiving this objection, Eaton states that Miles Tuttle has been deposed in connection with All Simmons Cooper Litigation filed in Madison County, Illinois (Madison County 3rd Circuit Court, IL 01/18/2006) and Flora Franklin, et al v General Motors Corporation, et al. (Anderson Circuit Court, KY, Case # 04-CI-00274, 11/22/2005). John Urban and Roger Hobbie have been deposed in connection with Debbie Acceturo, et al v Abex Corporation, et al. (Middlesex County Superior Court, NJ, Case # MID-L-6601-99, Urban: 02/02/2007 and Hobbie: 06/21/2007). Roger Hobbie was deposed in connection with All Asbestos Litigation filed by Simmons Cooper (Madison County 3rd Circuit Court, IL 10/4/2007).