

1 INTERROGATORY NO. 110:

2 Please list the names and addresses of all insurance
3 carriers which provided Worker's Compensation coverage for occu-
4 pational diseases for defendant's employees, including automo-
5 bile repair employees, between the years 1930 and 1972.

6 RESPONSE TO INTERROGATORY NO. 110:

7 Wagner objects to this Interrogatory on the grounds
8 that it is overly broad, unduly burdensome and not calculated to
9 lead to the discovery of admissible evidence.

10 INTERROGATORY NO. 111:

11 At any time during the period 1948 to 1978, has defen-
12 dant manufactured automobile undercoat sealer? If so, please
13 state:

14 (a) the trade or brand name(s) under which the
15 undercoat sealer was marketed,

16 (b) the years during which the undercoat sealer,
17 under each trade or brand name, was manufactured;

18 (c) the dates each product listed in (a) was
19 withdrawn from the market;

20 (d) the quantitative percentative of each chemi-
21 cal component of the undercoat sealer under each trade
22 or brand name;

23 (e) if asbestos was included in the composition
24 of the undercoat sealer which you manufactured under
25 any trade or brand name, please state:

26 (i) The type of asbestos fiber
27 (i.e., amosite, chrysotile, crocidolite)
28 used in the undercoat sealer under each
trade or brand name;

(ii) The quantitative percentage of
asbestos fiber used in the undercoat sealer
under each trade or brand name;

(iii) The years during which asbestos
fiber was included in the composition of the
undercoat sealer under each trade or brand
name;

(f) the location of the facility (facilities)
where the undercoat sealer was manufactured.