

Ans. No.

93. Based upon the material contents of your asbestos products, the method of manufacturing, and the method of application for the purpose of insulation, can your asbestos products be generally applied by an insulator without liberating asbestos fibers?

- (a) If there is a different answer concerning different products manufactured, sold, distributed, or used by your company then specify the different products by exact manufacturer's name and popular name.
- (b) If there is a difference in your answer depending on the year or years in which a particular product was used, then specify in detail what year or years you are referring to and the specific products you are referring to and the year involved.

Ans. Objection. This Interrogatory is irrelevant. Goodyear does not manufacture insulation products.


Objecting Attorney

94. Was it a foreseeable use of your asbestos products that they may have to be removed, stripped or replaced at any time after installation?

Ans. Yes

95. List and identify by name of insurer, date of issue, term, policy number and amount of coverage of every policy of liability insurance insuring you against losses as a result of claims for bodily injury or death as a result of use of your asbestos products.

**Ans. Hartford - 7/1/40-1/1/49
Liberty Mutual - 1/1/49 - 1/1/53
Continental Casualty Company - 1/1/53 - 1/1/61
Aetna - 1/1/61 - 1/1/71
Travelers - 1/1/71 - 1/1/77
\$300,000.00 per occurrence, \$1,000,000.00 aggregate
Since 1/1/77 Goodyear is self-insured for primary limits.**

96. State separately for each year from 1930 to the present: