INTERROGATORY NO. 9:

Has defendant, at any time from 1930 to the present, engaged in the processing, marketing and/or sale of products containing asbestos fibers?

RESPONSE:

Yes.

INTERROGATORY NO. 10:

If the answer to Interrogatory No. 3, No. 6 or No. 9 is affirmative, please state as to each affirmative answer:

(a) The trade or brand name of each product mined, manufactured, and/or marketed;

(b) The dates each product was placed on the market;

(c) The dates each product was withdrawn from the market;

(d) A description of the chemical composition of each product, including the type of asbestos contained in each such product (i.e., amosite, chrysotile, crocidolite) and the quantitative percentage of asbestos in each product;

(e) A description of the physical appearance of each product;

(f) A detailed description of the intended uses of each product;

(g) The name of the manufacturers of each product;

(h) The mining or milling concern from which the raw asbestos was obtained.

RESPONSE:

(a), (b) and (c):

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LAW OFFICES
INGER & COSTANZO
ESSIONAL CORPORATION
SEVENTH FLOOR
WILSHIRE BOULEVARD
NGELES, CA 90010-1161
AILING ADDRESS
P. O. BOX 60658
ERMINAL ANNEX
ANGELES, CA 90060
(213) 388-9441