PLAINTIFF'S EXHIBIT
GVH-38

IN THE COURT OF COMMON PLEAS
CUYAHOGA COUNTY, OHIO

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| RUTH V. DICKERSON, INDIVIDUALLY, AND AS PERSONAL REPRESENTATIVE OF THE HEIRS AND ESTATE OF ELDON CLAUDE DICKERSON, DECEASED, | : | CASE NO. 398302 |
| Plaintiffs, | : | (JUDGE HARRY A. HANNA) |
| -vs- | : | |
| A-BEST PRODUCTS COMPANY, ET AL., | : | |
| Defendants. | : | |

**DEFENDANT GEORGE V. HAMILTON, INC.'S RESPONSES TO PLAINTIFF'S MASTER SET OF REQUESTS FOR PRODUCTION**

**GENERAL STATEMENT AND OBJECTIONS**

George V. Hamilton, Inc. objects on the ground that plaintiffs' discovery requests are stated too broadly, are without proper specification, and, in effect, amount to nothing more than a "fishing expedition." George V. Hamilton, Inc., further objects to providing any information with regard to its products until plaintiffs have identified which of its products are at issue in the individual cases. The burden placed upon a defendant to respond to discovery without the identification of a product at issue or a specific job site where the product was used is excessive and onerous. Similarly, George V. Hamilton, Inc. objects to providing any information with regard to any of its products which are not at issue in this case.

George V. Hamilton, Inc. further objects to this request on the ground that it is not limited in scope to asbestos-containing products, which are in issue in this case. It is irrelevant whether George V. Hamilton, Inc. may have had any contracts for these facilities which did not involve asbestos-containing products.

George V. Hamilton, Inc. objects to references to time periods which are not relevant to the specific claims against it.

The corporate record retention policy of George V. Hamilton, Inc. is that it only retains

records of sales and/or contracts for the past seven (7) years, and George V. Hamilton, Inc. has not sold, distributed, or installed any asbestos-containing products for the past seven (7) years.

**REQUEST FOR PRODUCTION NO. 1:**

Please produce a true and correct copy of each photograph or picture of each asbestos-containing product that Defendant has ever mined, manufactured, sold, marketed, installed, and/or distributed.

RESPONSE: **Objection. This request is overly broad, unduly burdensome and harassing. Without waiving this objection, this defendant responds that it is impossible for it to determine precisely what products it has sold in the past since it only retains records of sales for the past seven (7) years and George V. Hamilton, Inc. has not sold or distributed any asbestos-containing products for the past (7) years. There are no documents responsive to this request.**

**REQUEST FOR PRODUCTION NO. 2:**

Please produce a true and correct copy of each document which reflects sales of those asbestos-containing products listed in response to Interrogatory No. 5 to any of the job sites listed on Exhibit A, attached hereto.

RESPONSE: **The corporate record retention policy of George V. Hamilton, Inc., is that it only retains records of sales and/or contracts for the past seven (7) years, and George V. Hamilton, Inc., has not sold, distributed, or installed any asbestos-containing products for the past seven (7) years. There are no documents responsive to this request.**

**REQUEST FOR PRODUCTION NO. 3:**

Please produce a true and correct copy of each document which reflects sales of Defendant's asbestos-containing products to companies that may have distributed, packaged, labeled, and/or sold Defendant's asbestos-containing products.

RESPONSE: **The corporate record retention policy of George V. Hamilton, Inc., is that it only retains records of sales and/or contracts for the past seven (7) years, and George V. Hamilton, Inc., has not sold, distributed, or installed any asbestos-containing products for the past seven (7) years. There are no documents responsive to this request.**

**REQUEST FOR PRODUCTION NO. 4:**

Please produce a true and correct copy of each record and/or contract which reflects the

sales of Defendant's asbestos-containing products to any of the job sites listed on Exhibit A, attached hereto.

RESPONSE: **The corporate record retention policy of George V. Hamilton, Inc., is that it only retains records of sales and/or contracts for the past seven (7) years, and George V. Hamilton, Inc., has not sold, distributed, or installed any asbestos-containing products for the past seven (7) years. There are no documents responsive to this request.**

**REQUEST FOR PRODUCTION NO. 5:**

Please produce a true and correct copy of each record and/or contract which reflects the sales of Defendant's asbestos-containing products to distributors and marketers who may have called on any of the job sites listed on Exhibit A, attached hereto.

RESPONSE: **The corporate record retention policy of George V. Hamilton, Inc., is that it only retains records of sales and/or contracts for the past seven (7) years, and George V. Hamilton, Inc., has not sold, distributed, or installed any asbestos-containing products for the past seven (7) years. There are no documents responsive to this request.**

**REQUEST FOR PRODUCTION NO. 6:**

Please produce a true and correct copy of each contract and/or work order that reflects contracts for Defendant to have asbestos-containing products installed or removed at any of the job sites listed on Exhibit A, attached hereto.

RESPONSE: **The corporate record retention policy of George V. Hamilton, Inc., is that it only retains records of sales and/or contracts for the past seven (7) years, and George V. Hamilton, Inc., has not sold, distributed, or installed any asbestos-containing products for the past seven (7) years. There are no documents responsive to this request.**

**REQUEST FOR PRODUCTION NO. 7:**

Please produce a true and correct copy of each work order and contract that reflects contract business between Defendant and any of the job sites listed on Exhibit A, attached hereto, for the application of asbestos-containing products.

RESPONSE: **The corporate record retention policy of George V. Hamilton, Inc., is that it only retains records of sales and/or contracts for the past seven (7) years, and George V. Hamilton, Inc., has not sold, distributed, or installed any asbestos-containing products for the past seven (7) years. There are no documents responsive to this request.**

**REQUEST FOR PRODUCTION NO. 8:**

Please produce a true and correct copy of each document relating to the design and preparation of the asbestos-containing products listed in Defendant's answer to Interrogatory No. 5.

RESPONSE: **The corporate record retention policy of George V. Hamilton, Inc., is that it only retains records of sales and/or contracts for the past seven (7) years, and George V. Hamilton, Inc., has not sold, distributed, or installed any asbestos-containing products for the past seven (7) years. There are no documents responsive to this request.**

**REQUEST FOR PRODUCTION NO. 9:**

For each product listed in response to Interrogatory No. 5, please produce a copy of all tests that were conducted to determine any potential health hazards involved in its use or exposure (this Request for Production relates to Plaintiffs' Interrogatory No. 18 previously propounded to Defendant in this litigation).

RESPONSE: **The corporate record retention policy of George V. Hamilton, Inc., is that it only retains records of sales and/or contracts for the past seven (7) years, and George V. Hamilton, Inc., has not sold, distributed, or installed any asbestos-containing products for the past seven (7) years. There are no documents responsive to this request.**

**REQUEST FOR PRODUCTION NO. 10:**

Please produce a true and correct copy of all documents relating to the testing of any product which Defendant listed in response to Interrogatory No. 5 (this Request for Production relates to Plaintiffs' Interrogatory No. 19 previously propounded to Defendant in this litigation).

RESPONSE: **The corporate record retention policy of George V. Hamilton, Inc., is that it only retains records of sales and/or contracts for the past seven (7) years, and George V. Hamilton, Inc., has not sold, distributed, or installed any asbestos-containing products for the past seven (7) years. There are no documents responsive to this request.**

**REQUEST FOR PRODUCTION NO. 11:**

Please produce a true and correct copy of all tests which Defendant conducted and/or has in its possession to determin potential health hazards involved in the se of or exposure to asbestos products listed in response to Interrogatory No. 5 (this Request for Production relates to Plaintiffs' Interrogatory No. 21 previously propounded to Defendant in this litigation).

RESPONSE: **See Objection and Answer to Interrogatory No. 21.**

**REQUEST FOR PRODUCTION NO. 12:**

Please produce a true and correct copy of all studies which Defendant conducted or caused to be conducted concerning the effects of the inhalation of asbestos dust and/or fibers in workers or other persons using, working with and/or around, installing and/or applying any of the asbestos products mined, manufactured, sold, distributed, marketed, installed and/or relabelled for distribution by Defendant or Defendant's predecessor (this Request for Production relates to Plaintiffs' Interrogatory No. 22 previously propounded to Defendant in this litigation).

RESPONSE: **There are no documents responsive to this request.**

**REQUEST FOR PRODUCTION NO. 13:**

Please produce a true and correct copy of all documents relating to any studies made or caused to be made by Defendant, to determine whether the asbestos-containing products mined, manufactured, sold, marketed, installed or distributed by Defendant or Defendant's predecessor would be hazardous to people (this Request for Production relates to Plaintiffs' Interrogatory No. 23 previously propounded to Defendant in this litigation).

RESPONSE: **See Objection and Answer to Interrogatory 23.**

**REQUEST FOR PRODUCTION NO. 14:**

Please produce a true and correct copy of all tests in the field which Defendant conducted or caused to be conducted to determine the nature and extent of asbestos dust and/or fiber exposure to insulators, applicators, fellow employees or other workers removing and/or tearing out asbestos-containing products (this Request for Production relates to Plaintiffs' Interrogatory No. 24 previously propounded to Defendant in this litigation).

RESPONSE: **See Objection and Answer to Interrogatory No. 24.**

**REQUEST FOR PRODUCTION NO. 15:**

Please produce a true and correct copy of each test which Defendant conducted or caused to be conducted regarding the quantity, quality, or threshold limit value of asbestos dust, fibers, and/or particles to which workers were exposed while using, working with and/or around, installing and/or applying Defendant's asbestos-containing products (this Request for Production relates to Plaintiffs' Interrogatory No. 31 previously propounded to Defendant in this litigation).

RESPONSE: **See Objection ans Answer to Interrogatory No. 31.**

**REQUEST FOR PRODUCTION NO. 16:**

For each product listed in response to Interrogatory No. 5, please produce a true and correct copy of all promotional or sales material including, but not limited to, brochures, pamphlets, catalogs, packaging, or other written materials of any kind or character.

RESPONSE: **The corporate record retention policy of George V. Hamilton, Inc., is that it only retains records of sales and/or contracts for the past seven (7) years, and George V. Hamilton, Inc., has not sold, distributed, or installed any asbestos-containing products for the past seven (7) years. There are no documents responsive to this request.**

**REQUEST FOR PRODUCTION NO. 17:**

Please produce a true and correct copy of all warnings, cautions, caveats or directions concerning the possible health effects of the products listed in response to Interrogatory No. 5 (this Request for Production relates to Plaintiffs' Interrogatory No. 41 previously propounded to Defendant).

RESPONSE: **See Objections and Answer to Interrogatory No. 41.**

**REQUEST FOR PRODUCTION NO. 18:**

Please produce a true and correct copy of all written materials prepared by Defendant or Defendant's predecessors or any of Defendant's subsidiaries indicating how the products listed in response to Interrogatory No. 5 should be used or maintained by the ultimate user (this Request for Production relates to Plaintiffs' Interrogatory No. 43 previously propounded to Defendant).

RESPONSE: **See Objection and Answer to Interrogatory No. 43 .**

**REQUEST FOR PRODUCTION NO. 19:**

Please produce a true and correct copy of all notices received by Defendant prior to 1968 that any person was claiming injury or had sustained an abnormal x-ray reading as a result of using asbestos-containing products mined, manufactured, sold, marketed, installed, or distributed by Defendant (this Request for Production relates to Plaintiffs' Interrogatory No. 48 previously propounded to Defendant).

RESPONSE: **There are no documents responsive to this request.**

**REQUEST FOR PRODUCTION NO. 20:**

Please produce a true and correct copy of statements from all people with knowledge of relevant facts to this lawsuit.

RESPONSE: **Objection. This request is vague, ambiguous, overbroad and invades the attorney-client privilge and the attorney work product docterine. Further, this defendant objects to producing such documents until it is required to do so pursuant to the applicable Case Management Order. However, in an effort to cooperate with discovery and withpout waivinbg any objections, this defendant responds that it has none other than the depositions or affidavits obtained through discovery which has been available to both parties. Discovery is continuing.**

**REQUEST FOR PRODUCTION NO. 21:**

Please produce a true and correct copy of all documents which mention, allude or refer to tests performed on breathing devices to prevent the inhalation of asbestos dust and/or fibers (this Request for Production relates to Plaintiffs' Interrogatory No. 52 previously propounded to Defendant).

RESPONSE: **See Objection and Answer to Interrogatory No. 52.**

**REQUEST FOR PRODUCTION NO. 22:**

Please produce a true and correct copy of all reports by experts that Defendant may call upon at the trial of this case (this Request for Production relates to Plaintiffs' Interrogatory No. 53 previously propounded to Defendant).

RESPONSE: **Objection. This defendant objects to producing the requested documents until it is required to do so pursuant to the Case Management Order. Discovery is continuing with regard to expert witnesses who will be called at time of trial and any reports received by any expert in this matter will be produced as is required by the Court's Case Management Order.**

**REQUEST FOR PRODUCTION NO. 23:**

Please produce a true and correct copy of all policies of insurance under which any person carrying on an insurance business may be liable to satisfy part or all of a judgment which may be entered in the action or to indemnify or reimburse for payments made to satisfy the judgment.

RESPONSE: **Objection. This request is vague and ambiguous, overbroad, unintelligible and not calculated to lead to the discovery of relevant or admissible evidence. Without waiving these objections, this defendant has disclosed all the information regarding insurance policies required by law in response to Plaintiff's Master Set of Interrogatories.**

**REQUEST FOR PRODUCTION NO. 24:**

Please produce a true and correct copy of all notices received by Defendant prior to 1968 that any person was claiming an injury or had sustained an abnormal x-ray reading as a result of using asbestos-containing products, regardless of the manufacturer or seller of the products.

RESPONSE: **There are no documents responsive to this request.**

**REQUEST FOR PRODUCTION NO. 25:**

Please produce a true and correct copy of all documents, correspondence or communications pertaining to all marketing, sales, negotiations, delivery or distribution of all of your asbestos-containing or industrial insulation products to all Defendants to this lawsuit other than the answering Defendant.

RESPONSE: **The corporate record retention policy of George V. Hamilton, Inc., is that it only retains records of sales and/or contracts for the past seven (7) years, and George V.**

**Hamilton, Inc., has not sold, distributed, or installed any asbestos-containing products for the past seven (7) years. There are no documents responsive to this request.**

**REQUEST FOR PRODUCTION NO. 26:**

Please produce a true and correct copy of all documents memorializing or referring, relating or pertaining to communications or correspondence among and/or between your officers, director, agents, representatives, employees or consultants and any employer, purchaser or user of your asbestos-containing products, its officers, directors, agents, representatives, employees or consultants which in any way relates, refers or pertains to asbestos, asbestos-containing products, pneumoconiosis, asbestos-related illness, injury or disease, dust or workplace health or safety.

RESPONSE: **There are no documents responsive to this request.**

**REQUEST FOR PRODUCTION NO. 27:**

Please produce a true and correct copy of all annual reports of Defendant to employees or stock holders for the years 1960 through 1969 and for the past five years.

RESPONSE: **Objection. This request is seeks irrelevant information and is not likely to lead to the discovery of admissible evidence.**

**REQUEST FOR PRODUCTION NO. 28:**

Please produce the originals or true and correct copies of all safety or health manuals, pamphlets or brochures issued by Defendant between 1930 and the present and any documents relating to whom said manuals were issued.

RESPONSE: **There are no documents responsive to this request.**

**REQUEST FOR PRODUCTION NO. 29:**

Please produce a true and correct copy of all safe workplace practices manuals, pamphlets or brochures issued by Defendant from 1900 through the present.

RESPONSE: **There are no documents responsive to this request.**

**REQUEST FOR PRODUCTION NO. 30:**

Please produce a true and correct copy of all documents referring, relating or pertaining to the Industrial Health Foundation or the Industrial Hygiene Foundation in the custody, possession or control of Defendant.

RESPONSE: **There are no documents responsive to this request.**

**REQUEST FOR PRODUCTION NO. 31:**

Please produce a true and correct copy of all documents referring, relating or pertaining to the Trudeau Institute and Saranac Lake Laboratory in the custody, possession or control of Defendant.

RESPONSE: **There are no documents responsive to this request.**

**REQUEST FOR PRODUCTION NO. 32:**

Please produce a true and correct copy of all documents referring, relating or pertaining to the Quebec Asbestos Mining Association (QAMA) in the custody, possession or control of Defendant.

RESPONSE: **There are no documents responsive to this request.**

**REQUEST FOR PRODUCTION NO. 33:**

Please produce a true and correct copy of all documents referring, relating or pertaining to the National Insulation Manufacturers Association (NIMA) in the custody, possession or control of Defendant.

RESPONSE: **There are no documents responsive to this request.**

**REQUEST FOR PRODUCTION NO. 34:**

Please produce a true and correct copy of all documents referring, relating or pertaining to the Thermal Insulation Manufacturers Association (TIMA) in the custody, possession or control of Defendant.

RESPONSE: **There are no documents responsive to this request.**

**REQUEST FOR PRODUCTION NO. 35:**

Please produce a true and correct copy of all documents relating to any conferences, symposia, or meetings attended by any of your officers, physicians, agents, servants, employees or consultants which in any way considered, discussed, reviewed or made recommendations concerning asbestos-related illness, injury or disease; pneumoconiosis; occupational lung disease; dust; industrial hygiene; and/or worker or workplace health or safety.

RESPONSE: **There are no documents responsive to this request.**

**REQUEST FOR PRODUCTION NO. 36:**

Please produce a true and correct copy of all documents to and/or from Defendant and any person, organization, institution, laboratory, foundation, corporation, entity, board or consultants which refer, relate or pertain to air quality studies, dust counts or dust studies, alleged maximum allowable concentrations (MAC), alleged threshold limit values (TLV) or protection of your employees or any other employees or persons from actual or alleged hazards associated with asbestos exposure.

RESPONSE: **There are no documents responsive to this request.**

**REQUEST FOR PRODUCTION NO. 37:**

Please produce a true and correct copy of all documents to and/or from Defendant and any person, organization, institution, laboratory, foundation, corporation, entity, board or consultants which refer, relate or pertain to air quality studies, dust counts or dust studies, alleged maximum allowable concentrations (MAC), alleged threshold limit values (TLV) or protection

of your employees or any other employees or persons.

RESPONSE: **There are no documents responsive to this request.**

**REQUEST FOR PRODUCTION NO. 38:**

Please produce a true and correct copy of all documents to and/or from Defendant involving any physician, industrial hygienist or public health specialist which in any way relates, refers or pertains to asbestos-related injury, illness or disease, pneumoconiosis, occupational lung disease, dust, industrial hygiene or worker or workplace health or safety.

RESPONSE: **There are no documents responsive to this request.**

**REQUEST FOR PRODUCTION NO. 39:**

Please produce a true and correct copy of all photographs, pictures, prints or any visual depiction at any time generated showing workers or any person or persons installing, applying, removing or in any manner handling or utilizing an asbestos-containing product at any time manufactured, sold or distributed by Defendant.

RESPONSE: **There are no documents responsive to this request.**

**REQUEST FOR PRODUCTION NO. 40:**

Please produce a true and correct copy of all documents pertaining to the acquisition, purchase or sale by Defendant of any asbestos-containing product manufacturing facility or asbestos-containing product or product line.

RESPONSE: **There are no documents responsive to this request.**

**REQUEST FOR PRODUCTION NO. 41:**

Please produce a true and correct copy of all documents pertaining to the acquisition, purchase or sale by Defendant of any asbestos-containing product from any other Defendant in this case or to any other Defendant in this case.

RESPONSE: **There are no documents responsive to this request.**

**REQUEST FOR PRODUCTION NO. 42:**

For each and every affirmative defense asserted in Defendant's Answer to Plaintiffs' Complaint, the cross-claims or counter-claims of any party against Defendant, produce each and every document which will be offered to prove each and every affirmative defense. For each and every allegation of Defendant in cross-claim(s) asserted by Defendant in this litigation, produce each and every document which will be offered to prove each and every allegation in Defendant's cross-claim(s).

RESPONSE: **Discovery with regard to these issues is ongoing. Further, the Defendants are not required to identify witnesses or documents until the appropriate time under the Court's Case Management Order. This information will be provided to Plaintiffs pursuant to the applicable Case Management Order.**

**REQUEST FOR PRODUCTION NO. 43:**

Please produce a true and correct copy of every transcript of testimony of each witness Defendant intends to call at trial.

RESPONSE: **Objection. The transcripts of the testimony o fthe witnesses to be called at trial in this matter are equally available to Plaintiff's counsel through the court reporters who prepared such transcripts. Without waiving this objection, this defendant responds that it has not yet determined the identity of the witnesses that it intends to call at trial with regrad to this case, nor is this defendant required to provide this information at this point in the discovery process according to the Court's Case Management Order. This information will be provided to Plaintiffs pursuant to the applicable Case Management Order.**

**REQUEST FOR PRODUCTION NO. 44:**

Please produce a true and correct copy of each and every medical record in the custody, possession or control of Defendant relating to Plaintiffs in this case other than those medical records produced by Plaintiffs and provided to Defendants in this case.

RESPONSE: **Objection. These documents are equally, if not more readily, available to Plaintiff's counsel.**

**REQUEST FOR PRODUCTION NO. 45:**

Please produce a true and correct copy of each and every document or other tangible item upon which Defendant will rely for impeachment or rebuttal purposes in the trial of this matter.

RESPONSE: **Objection. This request is overbroad and unduly burdensome. Further, it is ridiculous in that it asks for documents which cannot be identified until Plaintiff has put on evidence/ Without waiving any objections, this defendant responds that it will rely on all documents obtained through discovery in this matter, all of which will be equally available to Plaintiff's counsel.**

**REQUEST FOR PRODUCTION NO. 46:**

Please produce a true and correct copy of each and every document, recording or other tangible item that constitutes in whole or in part a statement by Plaintiffs or a statement by any of Plaintiffs' witnesses in this matter.

RESPONSE: **At the time that this request was made, no such documents exist to the knowledge of this defendant other than depositions or affidavits obtained through discovery which has been available to all parties. Discovery is ongoing.**

**REQUEST FOR PRODUCTION NO. 47:**

Please produce a true and correct copy of each and every photograph, videotape recording or other tangible item that is a photographic representation of Plaintiffs in this matter.

RESPONSE: **At the time that this request was made, no such recording or representation exists to this defendant's knowledge.**

**REQUEST FOR PRODUCTION NO. 48:**

Please produce a true and correct copy of all work records or other tangible items relating to Plaintiffs or their employers.

RESPONSE: **Objection. These documents are equally, if not more readily, available to Plaintiff's counsel.**

**REQUEST FOR PRODUCTION NO. 49:**

Please produce a true and correct copy of every transcript, affidavit or sworn statement by each and every witness called by Defendant in any litigation related to insurance that may cover the claims in this case.

RESPONSE: **Objection. This request is overbroad, ambiguous, vague and not calculated to lead to the discovery of relevant and/or admissible evidence. Without waiving these objections, refer to this defendant's Answer to Interrogatory No. 56.1 of Plaintiff's Master Set in this case.**

**REQUEST FOR PRODUCTION NO. 50:**

For each document for which any privilege is asserted, produce an index containing the following information:

(a) Author of document;

(b) Position, title or affiliation of author;

(c) Date of document;

(d) Each recipient of the document

(e) The position, title or affiliation of each recipient of the document;

(f) The subject matter of the document with sufficient specificity to determine the matters discussed therein; and

(g) The privilege(s) asserted.

RESPONSE: **Not applicable.**

**REQUEST FOR PRODUCTION NO. 51:**

If Defendant claims that the documents are too voluminous to produce as requested, provide the following:

(a) The numerical amount of documents responsive to requests herein;

(b) The method of storage of documents responsive to requests herein;

(c) The method of organzation of documents responsive to requests herein;

(d) The location of documents responsive to requests herein;

(e) Whether there is an index or indices, lists, inventories, or other such information for records responsive to requests herein;

(f) If there is an index, indices, lists, inventories or other such information for records responsive to requests herein, whether such index, indices, lists, inventories or other such information for records responsive herein is printed, or electronically stored, (i.e. listed in a computer, imaged, part of a database, etc.).

(g) If the index, indices, lists, inventories or other such information for records responsive to requests herein, whether such index, indices, lists, inventories or other such information for records responsive herein is electronically stored, (i.e. listed in a computer, imaged, part of a database, etc.), the method of such storage and software used to create and/or maintain said an index, indices, lists, inventories or other such information for records responsive to requests herein, whether such index, indices, lists, inventories or other such information for records responsive herein.

RESPONSE: **Not applicable.**

**REQUEST FOR PRODUCTION NO. 52**

If any answer to requests herein is subject to an ongoing investigation or continuing discovery, provide the following information:

(a) The person or persons responsible for the ongoing investigation or continuing discovery;

(b) The means or methods used or being used for the ongoing investigation or continuing discovery;

(c) The beginning date of such ongoing investigation or continuing discovery.

RESPONSE: **Objection. This request is overbroad, unduly burdensome and harassing. Further, this request seeks information that is subject to the attorney-client privilege. Finally, this inquiry is inappropriate as it is clearly not a request for production of documents. In an effort to cooperate and without waiving any objections, this defendant responds as follows:**

**a. Counsel for this defendant , as well as employees or other representatives of this defendant.**

**b. All means of discovery permitted under the Ohio Rules of Civil Procedure and the laws of the State of Ohio.**

**c. The date upon which this suit was served on this defendant.**

Respectfully submitted,

Thomas A. Smolinski
Pro Hac Vice
Counsel for Defendant, George V. Hamilton, Inc.

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Pittsburgh, PA 15237
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**EXHIBIT A**
BARON & BUDD SITE LIST

Queen City Steel, Cincinnati, Ohio
Ford Motor Company, Sharonville, Ohio

## CERTIFICATE OF SERVICE

The undersigned certifies an exact copy of the foregoing has been served on Plaintiff's counsel by first class U.S. mail to:

Laura M. Cabutto, Esquire
Baron & Budd
3102 Oak Lawn Avenue
Suite 1100
Dallas, Texas 75219-4281

A notice of service of the foregoing document has been electronically filed on CLAD on this the 21st day of January, 2003.



Thomas A. Smolinski, Esquire