

1 RESPONSE:

2 Not applicable.

3 INTERROGATORY NO. 104:

4 Please state whether the defendant entered into any agree-
5 ments with any British or German concerns which manufactured
6 asbestos-containing products from 1930 to 1972.

7 RESPONSE:

8 OBJECTION. Interrogatory No. 104 is objected to on the
9 grounds that it is overly broad, vague, ambiguous and unintelli-
10 gible with respect to the use of the undefined term "agreements."
11 As presently framed, this defendant cannot respond to the inter-
12 rogatory.

13 INTERROGATORY NO. 105:

14 If the answer to the above interrogatory is affirmative,
15 please list:

16 (a) The name, address and phone number of each such
17 British or German concern;

18 (b) The year the agreement was entered into and the
19 date said agreement terminated;

20 (c) The products exchanged or involved in said agree-
21 ment, including:

22 (i) The percent composition of asbestos;

23 (ii) The intended use of the product;

24 (iii) Whether the products were marketed in the
25 United States.

26 RESPONSE:

27 Not applicable, given the objection to Interrogatory No.
28 104.