

- (d) Whether any of those publications are still in your possession, and if so:
 - (i) A description of the publications, including the date.
 - (ii) The current location of such publications.
 - (iii) The custodian of such publications.
 - (iv) The method or manner in which such publications are maintained.

ANSWER:

See Preliminary Statement and General Objections, which are incorporated herein as if fully rewritten. Subject to and without waiving objections, Victor Products Division became an associate member of the Asbestos Information Association in 1985. In the late 1980's or early 1990's, Victor Products Division joined the Gasket Fabricators Association and the Asbestos Free Group and received publications from some of these associations.

INTERROGATORY NO. 21:

Identify by name and location each plant or manufacturing facility in which the products listed in your answers to Interrogatory Nos. 3-6 were manufactured, assembled, or prepared for sale or marketing, specifying which plants produced each item, the dates each plant is or was in operation, and the time span during which each named item was produced or manufactured.

ANSWER:

See Preliminary Statement and General Objections, which are incorporated herein as if fully rewritten. Subject to and without waiving objections, Victor Products Division manufactured asbestos-containing products in Chicago and Robinson, Illinois from 1967 until 1988, and Havana, Illinois from 1974 to 1980.