product by year and by specific product (i.e. if defendant made automobiles with asbestos-containing components, identify the source of each and every such component by make, model and year);

(f) Describe the color, physical characteristics, and appearance of each product;

(g) State any and all other names under which the product was sold, at any time;

(h) State the number and date of each patent or patent application for each product;

(i) If the product continued to be produced after the deletion of asbestos, state all reasons why the asbestos was deleted, identify of the person(s) who made the decision to delete the asbestos, and state the date the product was first produced without the asbestos;

(j) If the product is no longer produced, state all reasons it was discontinued, identify of the person(s) who made the decision to discontinue the product, state the brand name of the replacement product, and state the date the replacement product first went into production; and

(k) State the reasons why asbestos was used as an ingredient in each such product.

ANSWER: - Gleason objects to this Interrogatory as overly broad, burdensome, harassing, excessive in scope and time and incorrectly implying that its products were a health hazard.

INTERROGATORY NO. 22:

Identify any and all facilities at which defendant and/or any predecessor/related entity, at any time, manufactured or processed asbestos-containing products, raw asbestos and/or any other product(s) listed in response to Interrogatories Nos. 11 and 12 and in response to Standing Order No. 1 Interrogatories. For each such facility identified:

(a) State the date(s) which said facility was owned and/or operated by defendant and/or any