

If defendant cannot answer the following interrogatories in full after exercising due diligence to secure the full information to do so, then state and answer to the fullest extent possible, specifying defendant's inability to answer the remainder, stating whatever information or knowledge defendant has concerning the unanswered portion and detailing what defendant did in attempting to acquire the information.

Definitions

A. "Defendant," as used herein, includes the above-named defendant.

B. "Predecessor" or "predecessor entity or company" as used herein means any entity which previously owned, controlled or comprised all or any portion of the named defendant, or all or part of which has been acquired by the named defendant whether by asset purchase, merger and stock transaction. "Predecessor" or "predecessor entity or company" as used herein includes, but is not limited to, entities as to which the named defendant is liable as a successor as a successor in interest.

C. "Related entity or company" as used herein means any and all past or present parent companies, subsidiaries, sister companies or like entities which have or have had connected / interlocking ownership with the named defendant.

D. "Asbestos-containing product" as used herein means any product which included any form of asbestos and/or asbestos-containing material as any part of its composition, components, parts and/or ingredients. This term specifically