

RESPONSE TO INTERROGATORY NO. 32:

See objections and responses to Interrogatory No. 30.

INTERROGATORY NO. 33: If your answer to interrogatory No. 32 is affirmative in any respect, then please attach copies of all such minutes, records, proceedings or similar records or documents to your answers to these interrogatories. If you refuse to attach such copies, please state in detail your reasons for such refusal.

RESPONSE TO INTERROGATORY NO. 33:

See objections and responses to Interrogatory No. 30.

INTERROGATORY NO. 34: For the period that you, your predecessors in interest, divisions, or subsidiaries manufactured, sold or distributed products which contained asbestos that were used for thermal insulation purposes, state:

- 34a. The name and location of the entity from whom you obtained the asbestos used in such products and, if it varied from time to time, please state the supplier of your asbestos at each time.
- 34b. The type of asbestos obtained from each supplier at each time (e.g., amosite, crocidolite, chrysotile, anthophyllite).
- 34c. The manner in which the asbestos was packaged or contained when it reached the location where it was to be incorporated into another product or repackaged.
- 34d. The contents and/or description of any writing, marks, stamps, tags, designations or artwork appearing on any package or container of asbestos when it arrived at the location where it was to be incorporated into some other product or to be repackaged and, if it changed from time to time, state what such changes consisted of.

RESPONSE TO INTERROGATORY NO. 34:

Uniroyal objects to this interrogatory on the grounds that it is overbroad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence in this action as Plaintiffs have not alleged exposure to any specific Uniroyal product and, to the best of Uniroyal's knowledge, Plaintiff does not claim to have been employed at any Uniroyal manufacturing facility or to have been otherwise involved in the manufacture of Uniroyal's asbestos-containing products. Subject to and without waiving these objections, Uniroyal answers as follows:

Upon information and belief, Uniroyal purchased chrysotile asbestos fibers from the following companies:

**Bell Asbestos Mines, Ltd.
Thetford Mines, Quebec;**

**Asbestos Corporation Ltd.
Thetford Mines, Quebec;**

**Cassiar Asbestos Corporation, Ltd.
Toronto, Ontario;**

**Rhodesian & General Asbestos Corp.
(PVT) Ltd.
Bulaways, Rhodesia;**

Phillip Carey, Phillips Mine, Globe, Arizona;

**Van Packer Mine, Globe, Arizona (Also
Ontario);**

United Asbestos, Quebec, Canada;

**Rhodesian & General Asbestos Corporation, Ltd.,
Bulaways, Rhodesia;**

**Cassiar Asbestos Corporation, Ltd.,
British Columbia, Canada;**

**Huxley Development Corporation,
New York, New York;**

Continental Asbestos Co. Ltd., Canada;

Johns-Manville, location unknown;

Carey, Quebec, Canada;

Herely, Chicago, Illinois; and

General Services Administration.

Uniroyal further responds that it does not have information responsive to the remainder of this Interrogatory.

INTERROGATORY NO. 35: Did you, your predecessor in interest, divisions or subsidiaries at any time use the services of one or more persons, laboratory, facility or other entity for the purpose, in whole or in part, of evaluating occupational disease claims made against you, your predecessors in interest, divisions or subsidiaries, or evaluating people for the presence of pulmonary or cardio-pulmonary chest disease?

RESPONSE TO INTERROGATORY NO. 35:

In addition to the foregoing general objections, Uniroyal further objects to this interrogatory on the grounds that Uniroyal had many divisions, including divisions that made tires and chemicals, that have nothing to do with products that contain asbestos, which are the subject of this litigation. Defendant objects to having to provide the identity of each physician who may have advised Uniroyal during the past 40 years regarding matters unrelated to the products involved in this litigation as calling for information that is not relevant to the issues in this case, and that is unnecessarily burdensome to obtain. Without waiving those objections, Uniroyal responds as follows:

In 1964, Uniroyal hired Dr. J.F. Wolfsie as its first medical director. Dr. Wolfsie served in that capacity until 1971. Dr. Dexter Forbes served as medical director from 1971 to 1985. F.W. Sands and L.F. Dieringer served as Industrial Hygienists. Defendant is reviewing its records and will provide these individuals' current addresses, telephone numbers and job titles to plaintiff, if available.

The medical directors' duties were varied, but included the coordination of a comprehensive company-wide health promotional program. Uniroyal established a mandatory medical program for workers at its Hogansville, Georgia plant to monitor employee health in the manufacturing operations relating to Uniroyal's asbestos textile products. All of the employees at the Hogansville facility were given regular chest x-rays beginning in the early to mid-1940s; moreover, extensive ventilation equipment and dust reduction methods were continuously introduced and enhanced as more efficient

technological advances became known to reduce and/or control the dust associated with textile production.

INTERROGATORY NO. 36: If your answer to interrogatory No. 35 is affirmative, please state:

- 36a. The name and address of each person, laboratory, facility or other entity.
- 36b. The dates such services were used.
- 36c. To whom in your organization such person, laboratory, facility or other entity reported and, if the person in your organization changed from time to time, please state the person's name and position or title at each such time.

RESPONSE TO INTERROGATORY NO. 36:

See objections and responses to Interrogatory No. 35.

INTERROGATORY NO. 37: Did you, your predecessors in interest, divisions or subsidiaries or any trade association to which you, your predecessors in interest, divisions or subsidiaries belonged at any time use the services one or more persons, laboratory, insurance company, facility or other entity for the purpose of analyzing, evaluating or testing asbestos or asbestos-containing products to determine if asbestos was or those products were potential health hazards or were capable of producing adverse biological.

RESPONSE TO INTERROGATORY NO. 37:

In addition to the foregoing general objection, Uniroyal objects to this interrogatory as vague and overly broad. Subject to and without waiving the foregoing objections, Uniroyal responds as follows:

During the years that Uniroyal commercially produced textiles containing asbestos, Uniroyal utilized the services of a number of consultants, including, but not limited to, W.L.C. Hemeon, Dr. Anthony J. Lanza, Dr. Kenneth Lynch, Dr. Eugene Pendergrass, Dr. H.W. Grady, Dr. John Knox, and Dr. John Wells, for the purposes of studying and improving the dust control and medical programs at Uniroyal's Hogansville, Georgia facility.

INTERROGATORY NO. 38: Did you, your predecessors in interest, divisions or subsidiaries or any trade association to which you, your predecessors in interest, divisions or subsidiaries

belonged at any time use the services of one or more persons, laboratory, insurance company, facility or other entity for the purpose of analyzing, evaluating or testing products or ingredients or constituents were potential health hazards or were capable of producing adverse biological effects in persons or animals exposed to such products or ingredients or constituents?

RESPONSE TO INTERROGATORY NO. 38:

Uniroyal objects to this interrogatory on the grounds that it is overly broad in that it is not limited to asbestos-containing products which are the subject matter of this lawsuit.

Uniroyal further responds: See objections and responses to Interrogatories Nos. 24 and 37.

INTERROGATORY NO. 39: If your answer to interrogatory No. 37 or 38 is affirmative, then state:

- 39a. The name or names of each such person, laboratory, facility or other entity.
- 39b. The date or dates such services were used.
- 39c. A description of the products that were analyzed, evaluated or tested and the date or dates they were analyzed, evaluated or tested.
- 39d. The name, position or job title, and dates of employment of all persons employed by you who arranged for or requested such analysis, evaluation or testing, or were responsible for communicating with the person, laboratory, facility or other entity doing analyzing, evaluating or testing.
- 39e. Whether you have in your possession, custody or control any reports, letters, memoranda, documents, photographs, slides, graphs, charts, diagrams, notes or other tangible items pertaining to any such analyzing, evaluating or testing. If your response to this sub-section (e) is affirmative, state:
 - 39e.i. A description of all such materials sufficient to make such materials the subject of a request for production or, in the alternative,
 - 39e.ii. Attach copies of all such materials to your answers to these interrogatories.

RESPONSE TO INTERROGATORY NO. 39:

See objections and responses to Interrogatories Nos. 24 and 37.

INTERROGATORY NO. 40: State the name and last known address of all physicians employed by you, your predecessors in interest, divisions or subsidiaries, now or in the past, including where that physician was employed by you, the dates he was employed by you, and the general nature of the physician's duties while employed by you, your predecessors in interest, divisions, or subsidiaries.

RESPONSE TO INTERROGATORY NO. 40:

In addition to the foregoing general objections, Uniroyal further objects to this interrogatory on the grounds that Uniroyal had many affiliate companies, including companies that made tires and chemicals, that have nothing to do with products that contain asbestos, which are the subject of this litigation. Defendant objects to having to provide the identity of each physician who may have advised Uniroyal during the past 40 years regarding matters unrelated to the products involved in this litigation as calling for information that is not relevant to the issues in this case and unnecessarily burdensome to obtain. Without waiving those objections, Uniroyal responds as follows:

In 1964, Uniroyal hired Dr. J.H. Wolfsie as its first medical director. Dr. Wolfsie served in that capacity until 1971. Dr. Dexter Forbes served as medical director from 1971 to 1985. F.W. Sands and L.F. Dieringer served as Industrial Hygienists. Defendant is reviewing its records and will provide these individuals' current addresses, telephone numbers and job titles to plaintiff, if available.

The medical directors' duties were varied, but included the coordination of a comprehensive company-wide health promotional program. Uniroyal established a mandatory medical program for its workers at its Hogansville, Georgia plant to monitor employee health in the manufacturing operations relating to Uniroyal's asbestos textile products. All of the employees at the Hogansville facility were given regular chest x-rays beginning in the early to mid-1940s; moreover, extensive ventilation equipment and dust reduction methods were continuously introduced and enhanced as more efficient technological advances became known to reduce and/or control the dust associated with textile production.

INTERROGATORY NO. 41: State the name and last known address of all physicians working for you, your predecessors in interest, divisions or subsidiaries on a contract basis, now or in the past, including where that physician was located when doing contract work for you, the dates he was doing contract work for you and the general nature of the physician's duties while doing contract work for you, your predecessors in interest, divisions or subsidiaries.

RESPONSE TO INTERROGATORY NO. 41:

See objections and responses to Interrogatory No. 40.

INTERROGATORY NO. 42: State the name and last known address of all physicians working for you, your predecessors in interest, divisions or subsidiaries and paid by you, your predecessors in interest, division or subsidiaries and paid by you, your predecessors in interest, divisions or subsidiaries, as consultants, now or in the past, including where that physician was located when doing consultation work for you, the dates he was doing consultation work for you and the general nature of the physician's duties while doing consultation work for you, your predecessors in interest, divisions or subsidiaries.

RESPONSE TO INTERROGATORY NO. 42:

See objections and responses to Interrogatory No. 40

INTERROGATORY NO. 43: State the name and last know address of all industrial hygienist employed by you, your predecessors in interest, division or subsidiaries, now or in the past, including where that industrial hygienist was employed by you, your predecessors in interest, divisions or subsidiaries, the dates he was employed by you, and the general nature of the industrial hygienist's duties while employed by you, your predecessors in interest, divisions or subsidiaries.

RESPONSE TO INTERROGATORY NO. 43:

See objections and responses to Interrogatory No. 40

INTERROGATORY NO. 44: State the name and last known address of all industrial hygienists doing work for you, your predecessors in interest, divisions or subsidiaries on a contract basis, now or in the past, including where that industrial hygienist was located when doing contract work for you, your predecessors in interest, divisions or subsidiaries, the dates he was doing contract work for you and the general nature of the industrial hygienist's duties while doing contract work for you, your predecessors in interest, divisions or subsidiaries.

RESPONSE TO INTERROGATORY NO. 44:

See objections and responses to Interrogatory No. 40

INTERROGATORY NO. 45: State the name and last known address of all industrial hygienists working for you, your predecessors in interest, divisions or subsidiaries, and paid by you as consultants, now or in the past, including where that industrial hygienist was located when doing consultation work for you, the dates he was doing consultation work for you and the general

nature of the industrial hygienist's duties while doing consultation work for you, your predecessors in interest, divisions or subsidiaries.

RESPONSE TO INTERROGATORY NO. 45:

See objections and responses to Interrogatory No. 40

INTERROGATORY NO. 46: Do you, your predecessors in interest, divisions or subsidiaries claim that you at any time placed warnings, cautions or other advisement's of any asbestos or asbestos-containing products as to potential health hazards associated with use of such products on the products themselves on the packages in which such products were contained?

RESPONSE TO INTERROGATORY NO. 46:

Upon information and belief, beginning in approximately 1972 until the discontinuance of its asbestos textile business in 1976, Uniroyal placed a warning label on those asbestos textile products requiring such a warning. Upon information and belief, the wording of such label followed the language of the applicable OSHA regulations and was never amended. Similar warnings were put on labels for the rocket motor shields. It is presently not known whether any such labels were utilized on its mechanical rubber goods.

INTERROGATORY NO. 47: If your answer to interrogatory No. 46 is affirmative, please state:

- 47a. The exact wording of each such caution, warning or advisement.
- 47b. The exact date each such caution, warning or advisement was placed on your products or containers.
- 47c. Whether the caution, warning or advisement was placed on the product itself, on the container only or on both the product and container.
- 47d. The name and address of the person or entity who actually placed such labels on such products or packages.
- 47e. The identity of the product or product packaging on which such language was placed.
- 47f. Whether you have in your possession custody or control any product or product packaging that actually was used or intended to be used as a container for asbestos or an asbestos containing product.

RESPONSE TO INTERROGATORY NO. 47:

See objections and responses to Interrogatory No. 46. Uniroyal further responds that documents responsive to this request may be made available for review pursuant to the Colorado Rules of Civil Procedure.

INTERROGATORY NO. 48: Do you, your predecessor in interest, division or subsidiaries agree that the health hazards associated with exposure to asbestos and/or the asbestos in products containing asbestos include asbestosis, lung cancer, pleural mesothelioma, peritoneal mesothelioma and gastrointestinal cancer?

RESPONSE TO INTERROGATORY NO. 48:

In addition to the foregoing general objections, Uniroyal further objects on the grounds that this interrogatory calls for an expert conclusion. Subject to and without waiving the foregoing objections, Uniroyal responds as follows: Uniroyal is aware that exposure to certain types of amphibole asbestos is one known cause of mesothelioma.

INTERROGATORY NO. 49: If your answer to Interrogatory No. 48 is negative in any respect, then please state in detail the reasons for such negative response.

RESPONSE TO INTERROGATORY NO. 49:

See objections and responses to Interrogatory No. 48.

INTERROGATORY NO. 50: Did you, your predecessors in interest, divisions or subsidiaries ever publish or sponsor, in whole or in part, any publication (such as a pamphlet, brochure, article, or the like) which described the potential hazards associated with exposure to respirable asbestos, or which attempted to describe methods or procedures for handling asbestos or asbestos-containing products. If your response to this interrogatory is affirmative, please describe with sufficient particularity to make it the subject of a request for production each such publication, or alternatively, attach copies of all such publications to your answers to these interrogatories.

RESPONSE TO INTERROGATORY NO. 50:

In addition to the foregoing general objections, Uniroyal objects to this interrogatory on the grounds that it is overly broad and unduly burdensome, as well as beyond the scope of discovery permissible under the Colorado Rules of Civil Procedure in

that it does not seek discovery of a matter relevant to the issues raised by the claims or defenses of any party and the information sought does not appear reasonably calculated to lead to the discovery of admissible evidence. Subject to, and without waiving these objections, Uniroyal answers as follows: Based on information and belief, no.

INTERROGATORY NO. 51: Other than what is publicly available in the published literature, do you, your predecessors in interest, divisions or subsidiaries have in your possession, custody or control any documents, letters, reports, memoranda, notes, correspondence or other tangible items regarding or in any way related to any survey, study, investigation or analysis of any segment, sector or portion of the asbestos industry in the United States which was conducted by the United States Public Health Service? (The term "asbestos industry" includes any facility or location where asbestos or asbestos-containing products were mined, milled, processed, fabricated, used.)

RESPONSE TO INTERROGATORY NO. 51:

In addition to the foregoing general objections, Uniroyal objects to this interrogatory on the grounds that it is overly broad and unduly burdensome, as well as beyond the scope of discovery permissible under the Colorado Rules of Civil Procedure in that it does not seek discovery of a matter relevant to the issues raised by the claims or defenses of any party and the information sought does not appear reasonably calculated to lead to the discovery of admissible evidence. Subject to, and without waiving these objections, Uniroyal answers as follows: Based on information and belief, no. However, documents, if any, which are relevant to the issues in this case and are responsive to this request may be made available according to the Colorado Rules of Civil Procedure.

INTERROGATORY NO. 52: If your answer to interrogatory No. 51 is affirmative, then state:

- 52a.** The name, address and position or title of employment of the custodian of all such documents, letters, reports, memoranda, notes correspondence or other tangible items.
- 52b.** The location by address of all such items.
- 52c.** A description of each document, letter, report memorandum, note, correspondence or other tangible item, including the date of such item, the

number of pages of such item, the apparent author of such item, the recipient or addressees of such item (if any) and any other description adequate to make each such item the subject of a request for production.

- 52d. In lieu of answering this Interrogatory No. 52, you may supply copies of all such items with your answers to these interrogatories.

RESPONSE TO INTERROGATORY NO. 52:

Not applicable.

INTERROGATORY NO. 53: Do you, your predecessors in interest, divisions or subsidiaries have in your possession, custody or control any records, documents, reports lists, invoices, sales documents, shipping documents, receipts, compilations or other tangible items reflecting or containing the names or the addresses or both the names and addresses of persons to whom you, your predecessors in interest, divisions or subsidiaries sold asbestos or asbestos-containing products?

RESPONSE TO INTERROGATORY NO. 53:

In addition to the foregoing general objections, Uniroyal further objects on the grounds that this interrogatory asks for materials which are attorney work product and therefore not discoverable by plaintiffs. Subject to and without waiving the foregoing objections, documents responsive to this inquiry which are relevant to the issues in this case, and not subject to the work product doctrine may be made available for review according to the Colorado Rules of Civil Procedure.

INTERROGATORY NO. 54: If your answer to interrogatory No. 53 is affirmative, state:

- 54a. Do such items reflect any date or dates on which such products were sold?
- 54b. State the name, address and position or title of employment of the custodian of all such items.
- 54c. Describe each such item, individually or by category in such a manner as to identify all such items so that all such items may be made the subject of a request for production.
- 54d. In lieu of answering this interrogatory No. 46, please attach copies of all such items to your answers to these interrogatories.

RESPONSE TO INTERROGATORY NO. 54:

See objections and response to Interrogatory No. 52. Uniroyal further responds as follows: All of Uniroyal's documents are located at the offices of Uniroyal Holding, Inc., Naugatuck, CT 06770. The custodian of these documents is Robert V. D'Angelo, Jr., General Counsel of Uniroyal Holding, Inc., Naugatuck, CT 06770.

INTERROGATORY NO. 55: Do you, your predecessors in interest, divisions or subsidiaries have any evidence or information as to whether or not there ever was in the State of Colorado any facility, the purpose of function of which was to mine asbestos, mill asbestos or manufacture products incorporating asbestos as an ingredient? If so, please state all evidence or information you have in this regard.

RESPONSE TO INTERROGATORY NO. 55:

In addition to the foregoing general objections, Uniroyal objects to this interrogatory on the grounds that it is overly broad and unduly burdensome, as well as beyond the scope of discovery permissible under the Colorado Rules of Civil Procedure in that it does not seek discovery of a matter relevant to the issues raised by the claims or defenses of any party and the information sought does not appear reasonably calculated to lead to the discovery of admissible evidence. Subject to, and without waiving these objections, Uniroyal answers as follows: Based on information and belief, Uniroyal has no knowledge of such a facility.

INTERROGATORY NO. 56: State the name, address and job title or position of employment of the person or persons employed by this defendant who is most knowledgeable concerning the names of the persons or the entities to whom this defendant sold asbestos or asbestos-containing products from 1935 up to and including the date this defendant last sold asbestos or asbestos-containing products.

RESPONSE TO INTERROGATORY NO. 56:

In addition to the foregoing general objections, Uniroyal further objects to this interrogatory on the grounds that it is overly broad and unduly burdensome, as well as beyond the scope of discovery permissible under the Colorado Rules of Civil Procedure in

that it does not seek discovery of a matter relevant to the issues raised by the claims or defenses of any party and the information sought does not appear reasonably calculated to lead to the discovery of admissible evidence. Subject to, and without waiving these objections, Uniroyal answers as follows:

Uniroyal is a dissolved corporation. It has no employees and it has not engaged in any business since that time, other than as required to wind up its affairs pursuant to applicable provisions of New Jersey law.

INTERROGATORY NO. 57: State the name, address and job title or position of employment of the person or persons employed by this defendant who is most knowledgeable concerning the names of the persons or the other entities to whom this defendant sold any product manufactured, distributed or sold by this defendant from 1935 up the date of your answers to these interrogatories.

RESPONSE TO INTERROGATORY NO. 57:

In addition to the foregoing general objections, Uniroyal objects to this interrogatory on the grounds that it is overly broad and not limited to asbestos-containing products, which are the subject of this lawsuit. Subject to and without waiving the foregoing objections, Uniroyal responds as follows: See objections and response to Interrogatory No. 56.

INTERROGATORY NO. 58: List each State of the United States in which this defendant, its subsidiaries, divisions or predecessors-in-interest has or in the past had customers who purchased products from this defendant, its subsidiaries, divisions or predecessors-in-interest, including the name of the customer, a description of the products that customer purchased from this defendant, its subsidiaries, divisions or predecessors-in-interest, and the inclusive dates that customer purchased products from this defendant, its subsidiaries, divisions or predecessors-in-interest.

RESPONSE TO INTERROGATORY NO. 58:

In addition to the foregoing general objections, Uniroyal objects to this interrogatory on the grounds that it is overly broad, as it is not limited to asbestos-containing products which are the subject of this lawsuit, and unduly burdensome, as well

as beyond the scope of discovery permissible under the Colorado Rules of Civil Procedure in that it does not seek discovery of a matter relevant to the issues raised by the claims or defenses of any party and the information sought does not appear reasonably calculated to lead to the discovery of admissible evidence.

INTERROGATORY NO. 59: Does this defendant know the name and address of any person or persons not employed by this defendant, and who used to be employed by this defendant, its subsidiaries, divisions or predecessors-in-interest, who is knowledgeable concerning the persons or entities to whom this defendant sold products manufactured, distributed or sold by this defendant? If your answer to this interrogatory is affirmative then state the name and address of each such person.

RESPONSE TO INTERROGATORY NO. 59:

In addition to the foregoing general objections, Uniroyal objects to this interrogatory on the grounds that it is overly broad, as it is not limited to asbestos-containing products which are the subject of this lawsuit, and unduly burdensome, as well as beyond the scope of discovery permissible under the Colorado Rules of Civil Procedure in that it does not seek discovery of a matter relevant to the issues raised by the claims or defenses of any party and the information sought does not appear reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving the foregoing objections, Uniroyal responds as follows:

Uniroyal filed a certificate of dissolution with the Secretary of State of New Jersey on December 2, 1986. It has no employees and it has not engaged in any business since that time, other than as required to wind up its affairs pursuant to applicable provisions of New Jersey law. Uniroyal further responds that the following were supervisors in the Industrial Textile Division: Staton Peele; Richard P. Clark; Edward A. Morris (succeeded Clark); and Clarence H. Sigler, Jr. (succeeded Morris). Uniroyal further responds that William Ellett was also a former employee of the Textile Division and is knowledgeable regarding

the sales and marketing organization for Uniroyal's Textile Division and the customers for these products.

INTERROGATORY NO. 60: Does this defendant, its subsidiaries, divisions or predecessors in-interest, have in its possession, custody or control any documents, records or other tangible items that, in whole or in part, contain information about the names and locations of its customers for asbestos or asbestos-containing products? If the answer to this interrogatory is affirmative, please identify each such document, record or other tangible item with sufficient particularity so that it may be made the subject of a request for production; state the name, address and job title of the custodian of each such document; state the location of each such document.

RESPONSE TO INTERROGATORY NO. 60:

In addition to the foregoing general objections, Uniroyal further objects on the grounds that this interrogatory asks for materials which are attorney work product and therefore not discoverable by plaintiffs. Subject to and without waiving the foregoing objections, documents responsive to this inquiry which are relevant to the issues in this case and not subject to the work product doctrine may be made available for review according to the Colorado Rules of Civil Procedure.

INTERROGATORY NO. 61: Does this defendant, its subsidiaries, divisions or predecessors in-interest, have in its possession, custody or control any documents, records or other tangible items that, in whole or in part, contain information about the names and locations of its customers for any product manufactured, distributed or sold by this defendant? If the answer to this interrogatory is affirmative, please identify each such document, record or other tangible item with sufficient particularity so that it may be made the subject of a request for production; state the name, address and job title of the custodian of each such document; state the location of each such document.

RESPONSE TO INTERROGATORY NO. 61:

In addition to the foregoing general objections, Uniroyal objects to this interrogatory on the grounds that it is overly broad and not limited to asbestos-containing products, which are the subject of this lawsuit. Subject to and without waiving the foregoing objections, Uniroyal responds as follows: See objections and response to Interrogatory No. 60.

INTERROGATORY NO. 62: Does this defendant, its subsidiaries, divisions or predecessors in-interest, know of any documents, records or other tangible items not in its possession or control that, in whole or in part, contain information about the names and locations of its customers for asbestos and asbestos-containing products? If the answer to this interrogatory is affirmative, please identify such documents to the best of defendant's ability and if defendant is able to do so describe such documents, records, or other tangible item by subject, author, recipient, date or other applicable category; identify the name of the person or other entity who, to the best of defendant's knowledge, has possession, custody or control of such documents, records or other tangible items; state, to the best of this defendant's knowledge the location of such documents, records or other tangible items.

RESPONSE TO INTERROGATORY NO. 62:

In addition to the foregoing general objections, Uniroyal objects to this interrogatory on the grounds that it is overly broad and unduly burdensome, as well as beyond the scope of discovery permissible under the Colorado Rules of Civil Procedure in that it does not seek discovery of a matter relevant to the issues raised by the claims or defenses of any party and the information sought does not appear reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving the foregoing objections, Uniroyal responds as follows: Based upon information and belief, no.

INTERROGATORY NO. 63: Does this defendant, its subsidiaries, divisions, or predecessors in-interest, know of any documents, records or other tangible items not in its possession or control that, in whole or in part, contain information about the names and locations of its customers for any product manufactured, distributed or sold by this defendant? If the answer to this interrogatory is affirmative, please identify such documents to the best of defendant's ability and if defendant is able to do so describe such documents, records, or other tangible item by subject, author, recipient, date or other applicable category; identify the name of the person or other entity who, to the best of defendant's knowledge has possession, custody or control of such documents, records or other tangible items; state to the best of this defendant's knowledge, the location of such documents, records or other tangible items.

RESPONSE TO INTERROGATORY NO. 63:

In addition to the foregoing general objections, Uniroyal objects to this interrogatory on the grounds that it is overly broad and not limited to asbestos-containing products which are the subject of this lawsuit. Subject to and without waiving the foregoing

objections, Uniroyal responds as follows: See objections and response to Interrogatory No.

62.

INTERROGATORY NO. 64: Did this defendant, its subsidiaries, divisions, or predecessors in-interest, at any time make any effort to limit the geographical area in which products manufactured, distributed or sold by it were in fact distributed and sold? If defendant's answer to this interrogatory is affirmative then state the following:

- 64a. Of what did such efforts consist?
- 64b. Does defendant know of any document, record or other tangible item that describes, in whole or in part, any such effort on the part of defendant, its subsidiaries, divisions or predecessors-in-interest? If so, then state:
 - 64bi. The verbatim contents of each such documents, record or other tangible item (or attach copies to defendant's answers to interrogatories);
 - 64bii. The location of each such document, record or tangible item;
 - 64biii. The name and address of the custodian of each such document, record or other tangible item.
- 64c. State the name, address and job title of each person employed by defendant who has knowledge about any such efforts on the part of defendant.
- 64d. State the name, address and former position of employment of any person who in the past was employed by defendant who defendant believes to have knowledge concerning any such efforts on the part of defendant.

RESPONSE TO INTERROGATORY NO. 64:

In addition to the foregoing general objections, Uniroyal objects to this interrogatory on the grounds that it is overly broad and unduly burdensome, as well as beyond the scope of discovery permissible under the Colorado Rules of Civil Procedure in that it does not seek discovery of a matter relevant to the issues raised by the claims or defenses of any party and the information sought does not appear reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving the foregoing objections, Uniroyal responds as follows: Based upon information and belief, no.

INTERROGATORY NO. 65: If defendant claims the court in which this action is filed does not have personal jurisdiction over this defendant then state:

- 65a. Each document, record or other tangible item on which you may rely to support that claim, and describe each such document, record or other tangible item with sufficient particularity so that it (or they) may be made the subject of a request for production.
- 65b. The name, address and occupation of every person you may call as a witness testimony in support of such claim;
- 65c. Give a summary of the knowledge or information each person identified in answer to interrogatory No. 10(b) has concerning such claim.

RESPONSE TO INTERROGATORY NO. 65:

Subject to and without waiving the foregoing general objections, Uniroyal answers as follows: Uniroyal does not intend to contest personal jurisdiction in this matter.

INTERROGATORY NO. 66: Please state the official title or position in defendant [sic] corporation of the person or persons answering these interrogatories and signing the same.

RESPONSE TO INTERROGATORY NO. 66:

Subject to and without waiving the foregoing general objections, Uniroyal answers as follows:

Robert V. D'Angelo, Jr., General Counsel of Uniroyal Holding, Inc., is the individual primarily responsible for gathering the information and documents used in answering these interrogatories.

Uniroyal's answers are based upon an ongoing review of Uniroyal's documents and information obtained from ongoing discussions with various Uniroyal personnel over a period of years. The information contained herein has been assembled by employees and counsel for Uniroyal over many years' time. It is not possible to reconstruct each step taken to gather this information, to identify by name each person who could be said to have furnished the information upon which an answer is based, in whole or in part, or to identify all documents that may have provided information upon which an answer is based

in whole or in part. Uniroyal reserves the right to amend these answers on the basis of any further information that is obtained.

INTERROGATORY NO. 67: For that period of time commencing in the year 1935 through 1983 inclusive, please answer the below interrogatories:

RESPONSE TO INTERROGATORY NO. 67:

See objections and responses set forth below.

INTERROGATORY NO. 68: Did your company, its subsidiaries, divisions or predecessors-in-interest have distributorships or dealers in the State of Colorado to which your insulation or other products were distributed?

RESPONSE TO INTERROGATORY NO. 68:

In addition to the foregoing general objections, Uniroyal objects to this interrogatory on the grounds that it is overly broad and unduly burdensome, as well as beyond the scope of discovery permissible under the Colorado Rules of Civil Procedure in that it does not seek discovery of a matter relevant to the issues raised by the claims or defenses of any party and the information sought does not appear reasonably calculated to lead to the discovery of admissible evidence. Uniroyal further objects on the grounds that the information sought is irrelevant as Uniroyal is not contesting personal jurisdiction in this matter. Subject to and without waiving the foregoing objections, Uniroyal responds as follows:

Uniroyal did not sell its asbestos textile products through distributors. All sales were made directly by Uniroyal through its own salespersons. Uniroyal is currently without any information regarding the methods of distribution of its mechanical rubber goods.

INTERROGATORY NO. 69: Did you, your subsidiaries, divisions or predecessors-in-interest have a business relationship with any person or business in the State of Colorado for the purpose of distributing your products? If so, state:

RESPONSE TO INTERROGATORY NO. 69:

See objections and response to Interrogatory No. 68.

INTERROGATORY NO. 70: Please state the name and address of all persons or businesses in the State of Colorado with which you, your subsidiaries, divisions or predecessors-in-interest had a business relationship, whether direct or indirect.

RESPONSE TO INTERROGATORY NO. 70:

In addition to the foregoing general objections, Uniroyal objects to this interrogatory on the grounds that it is overly broad and unduly burdensome, as well as beyond the scope of discovery permissible under the Colorado Rules of Civil Procedure in that it does not seek discovery of a matter relevant to the issues raised by the claims or defenses of any party and the information sought does not appear reasonably calculated to lead to the discovery of admissible evidence. Uniroyal further objects on the grounds that the information sought is irrelevant as Uniroyal is not contesting personal jurisdiction in this matter.

INTERROGATORY NO. 71: How long have you, your subsidiaries, divisions or predecessors-in-interest, had a business relationship with each such person or business?

RESPONSE TO INTERROGATORY NO. 71:

See objections to Interrogatory No. 70.

INTERROGATORY NO. 72: What is or was the purpose of the business relationship?

RESPONSE TO INTERROGATORY NO. 72:

See objections to Interrogatory No. 70.

INTERROGATORY NO. 73: Were your, your subsidiaries', divisions', or your predecessors'-in-interest products eventually sold to the general public in the State of Colorado through persons or businesses in the State of Colorado with which you had a business relationship?

RESPONSE TO INTERROGATORY NO. 73:

See objections and response to Interrogatory No. 68.

INTERROGATORY NO. 74: Did your company, its subsidiaries, divisions or predecessors-in-interest promote the sales of your products through the advertising media in the State of Colorado? If so, state:

RESPONSE TO INTERROGATORY NO. 74:

See objections to Interrogatory No. 70.

INTERROGATORY NO. 75: Please state the type media used for such advertising, i.e., television, magazines, newspapers, etc.

RESPONSE TO INTERROGATORY NO. 75:

See objections to Interrogatory No. 70.

INTERROGATORY NO. 76: Are any national television networks used for publicizing your products by your company, its subsidiaries, divisions or predecessors-in-interest? If so, please state which programs are sponsored by your products and on which networks.

RESPONSE TO INTERROGATORY NO. 76:

See objections to Interrogatory No. 70.

INTERROGATORY NO. 77: Did your company, its subsidiaries, divisions, or predecessors in-interest sponsor any other advertising for the sale of your products in any nationally distributed magazines? If so, which magazines?

RESPONSE TO INTERROGATORY NO. 77:

See objections to Interrogatory No. 70.

INTERROGATORY NO. 78: Did your company, its subsidiaries, divisions or predecessors-in-interest sponsor any other advertising in any news media on a national scale? If so, please state and describe the nature of such advertising.

RESPONSE TO INTERROGATORY NO. 78:

See objections to Interrogatory No. 70.

INTERROGATORY NO. 79: Had your company, its subsidiaries, divisions or predecessors in-interest sponsored any advertising in any news media in the State of Colorado including newspapers, magazines, etc., distributed in Colorado, local television programming or any national television programs that would be received in Colorado? If so, please describe the nature of such advertising.

RESPONSE TO INTERROGATORY NO. 79:

See objections to Interrogatory No. 70.

INTERROGATORY NO. 80: If your company, its subsidiaries, divisions, or predecessors-in interest had sponsored any advertising as set forth in any of the above paragraphs, please state whether this advertising or comparable advertising was being used or sponsored by your company, its subsidiaries, divisions or predecessors-in-interest for the sale of your products during the year 1976 and prior thereto.

RESPONSE TO INTERROGATORY NO. 80:

See objections to Interrogatory No. 70.

INTERROGATORY NO. 81: Did your company, its subsidiaries, divisions or predecessors-in - interest keep any books or records on the number of your products distributed to the State of Colorado and sold in the State of Colorado? If so, how long had such books or records been kept and where are they located?

RESPONSE TO INTERROGATORY NO. 81:

Uniroyal objects to Interrogatory No. 81 on the grounds that it is vague, ambiguous, overbroad, and unduly burdensome. Uniroyal further objects to this Interrogatory to the extent that it seeks information which is irrelevant and not reasonably calculated to lead to the discovery of admissible evidence in this action. Subject to and without waiving these objections, Uniroyal states that it has not compiled information specifically responsive to this Interrogatory.

INTERROGATORY NO. 82: Did your company, its subsidiaries, divisions or predecessors-in interest keep any books or records on the quantity of insulation distributed to the State of Colorado and/or sold or used in the State of Colorado? If so, state:

- 82a. How long had such books or records been kept and where are they located?
- 82b. Did such records reflect the names of the ultimate purchasers of insulation in Colorado?
- 82c. Did such records reflect the names of the ultimate purchasers of insulation in Colorado?

RESPONSE TO INTERROGATORY NO. 82:

Uniroyal objects to Interrogatory No. 82 on the grounds that it is vague, ambiguous, overbroad, and unduly burdensome. Uniroyal further objects to this Interrogatory to the extent that it seeks information which is irrelevant and not reasonably calculated to lead to

the discovery of admissible evidence in this action. Subject to and without waiving these objections, Uniroyal states that it has not compiled information specifically responsive to this Interrogatory.

INTERROGATORY NO. 83(c) [SIC]: Did such records reflect the name and address of each purchaser or of any purchasers of asbestos containing products?

RESPONSE TO INTERROGATORY NO. 83(C) [SIC]:

See objections and response to Interrogatory No. 82.

INTERROGATORY NO. 84: Did your company, its subsidiaries, divisions, or predecessors in-interest keep any books or records on the quantity, number or amount of your products distributed to the State of Colorado and sold in the State of Colorado which contain or are manufactured with asbestos, and which products would include products other than insulation? If so, state:

RESPONSE TO INTERROGATORY NO. 84:

See objections and response to Interrogatory No. 82

INTERROGATORY NO. 85: How long had such books or records been kept and where are they located?

RESPONSE TO INTERROGATORY NO. 85:

See objections and response to Interrogatory No. 82

INTERROGATORY NO. 86: Did such records reflect the names of the ultimate purchasers of such products in Colorado?

RESPONSE TO INTERROGATORY NO. 86:

See objections and response to Interrogatory No. 82

INTERROGATORY NO. 87: Did such records reflect the dates and quantities of such products purchased and by whom?

RESPONSE TO INTERROGATORY NO. 87:

See objections and response to Interrogatory No. 82

INTERROGATORY NO. 88: Did such records reflect the name and address of each purchaser or of any purchasers of such products?

RESPONSE TO INTERROGATORY NO. 88:

See objections and response to Interrogatory No. 82

INTERROGATORY NO. 89: Did your company, its subsidiaries, divisions or predecessors-in-interest distribute any information on the maintenance of your products? If so, state:

RESPONSE TO INTERROGATORY NO. 89:

Uniroyal objects to Interrogatory No. 89 on the grounds that it is vague, ambiguous, overbroad, in that it is not limited to asbestos-containing products which are the subject of this lawsuit, and unduly burdensome. Uniroyal further objects to this Interrogatory to the extent that it seeks information which is irrelevant and not reasonably calculated to lead to the discovery of admissible evidence in this action. Subject to and without waiving these objections, Uniroyal states that it has not compiled information specifically responsive to this Interrogatory.

INTERROGATORY NO. 90: What use is made of such information on maintenance of your products?

RESPONSE TO INTERROGATORY NO. 90:

See objections and response to Interrogatory No. 89.

INTERROGATORY NO. 91: Is any of this information distributed to any persons or businesses in the State of Colorado?

RESPONSE TO INTERROGATORY NO. 91:

See objections and response to Interrogatory No. 89.

INTERROGATORY NO. 92: Does this defendant believe that it is covered by any policy of insurance, excess insurance, reinsurance or indemnity insurance or coverage for claims made against it in the complaint for damages in this case? If your answer to this interrogatory is affirmative then for each such policy please state:

- a. The name of the company issuing or writing each policy.
- b. The number of each policy.

- c. The effective dates of coverage of each policy.
- d. The dollar amount of coverage of each policy, for each occurrence or claim and in the aggregate for all claims or occurrences to which the policy applies.
- e. The dollar amount of available coverage remaining on each policy based on the most current information available.
- f. The type of claims for which each policy of insurance provides coverage.

RESPONSE TO INTERROGATORY NO. 92:

In addition to the foregoing general objections, Uniroyal objects to this interrogatory on the grounds that it is overly broad and unduly burdensome, as well as beyond the scope of discovery permissible under the Colorado Rules of Civil Procedure in that it does not seek discovery of a matter relevant to the issues raised by the claims or defenses of any party and the information sought does not appear reasonably calculated to lead to the discovery of admissible evidence.

INTERROGATORY NO. 93: Has your corporation, its subsidiaries, divisions or predecessors - in-interest been doing business in the State of Colorado, either directly or indirectly? If so, state:

RESPONSE TO INTERROGATORY NO. 93:

In addition to the foregoing general objections, Uniroyal objects to this interrogatory on the grounds that it is overly broad, as it is not limited to asbestos-containing products which are the subject of this lawsuit and unduly burdensome, as well as beyond the scope of discovery permissible under the Colorado Rules of Civil Procedure in that it does not seek discovery of a matter relevant to the issues raised by the claims or defenses of any party and the information sought does not appear reasonably calculated to lead to the discovery of admissible evidence. Uniroyal further objects on the grounds that