or regulations, industry regulations, standards and codes upon which Defendants relied in the design, manufacture or marketing of Defendants asbestos and/or asbestos-containing products.

RESPONSE:

See Response to Request for Production No. 1, which is incorporated herein as if fully rewritten.

REQUEST FOR PRODUCTION NO. 18:

A bibliography of all titles in Defendants' library concerning the health risks associated with the inhalation of asbestos dust and fibers.

RESPONSE:

See Response to Request for Production No. 1, which is incorporated herein as if fully rewritten.

REQUEST FOR PRODUCTION NO. 19:

Please produce all documents reflecting or relating to any demonstrated, recognized or anticipated problems with the performance or safety of Defendants asbestos and/or asbestos-containing products designed, manufactured, sold or otherwise placed in the stream of commerce by Defendants from 1968 to 1995.

RESPONSE:

See Response to Request for Production No. 1, which is incorporated herein as if fully rewritten.

REQUEST FOR PRODUCTION NO. 20:

Documents relating to any comparisons made by, or on Defendants' behalf, between Defendants asbestos and asbestos-containing products and any similar competitive asbestos product manufactured by others.

RESPONSE:

See Response to Request for Production No. 1, which is incorporated herein as if fully rewritten.

REQUEST FOR PRODUCTION NO. 21:

Documents relating to seminars, conferences or meetings at which Defendants was represented regarding the state of the art concerning the design, manufacture, production or safety of asbestos and/or any products containing asbestos included, but not limited to, asbestos-containing products as defined herein.