

- (h) The name and business address of the present custodian records of defendant corporation and any prior custodian of records of defendant corporation.

**ANSWER:**

- A Eaton Corporation
- B OBJECTION. Overbroad. Without waiving this objection, Eaton states that from 1923 to 1932 it was known as Eaton Axle & Spring Company; from 1932 to 1966, Eaton Manufacturing Company; and from 1966 to 1972 Eaton, Yale & Towne, Inc.
- C OBJECTION. Overbroad, not calculated to lead to the discovery of relevant evidence. Without waiving this objection, Eaton states that it acquired Schuler Manufacturing in 1958
- D OBJECTION. Overbroad, not calculated to lead to the discovery of relevant evidence. Without waiving this objection, Eaton states that it manufactures products under the Eaton and Eaton Fuller name.
- E See Response to subparts B, C and D.
- F Eaton's principal place of business is in Cleveland, Ohio
- G All such documents currently in possession of Eaton Corporation have been made available for inspection and copying by Plaintiff's counsel.
- H OBJECTION. Not reasonably calculated to lead to the discovery of relevant evidence

**Interrogatory No. 3**

State whether there is any liability insurance which covers, or may cover, you for the instant matter and, if so, discuss:

- (a) the name and address of the insurance carrier;
- (b) the policy number, including years for each policy; and
- (c) the applicable limits of liability.

**ANSWER:**

OBJECTION. A summary of insurance will be provided to Plaintiff's counsel.