

RESPONSE TO MASTER INTERROGATORY 13:

See Preliminary Statement and General Objections.

Further objecting, this interrogatory and its instructions are overly broad, unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving objections, Victor has been in business since 1909 and there are over 60,000 different types of gaskets manufactured by Victor. Without more specific information provided by the plaintiff concerning the products to which exposure is claimed, this defendant objects to providing the information sought by this interrogatory.