ANSWER: See 4, 14 and 19.

e) The name, address and job classification of each person or persons who have possession of the above described documents.

ANSWER: Unknown.

f) Attach copies of such warnings or bulletins.

ANSWER: See 4, 14, 18 and 19.

g) The name of the author of said warnings or bulletin in the employ of the Defendant. The inquiry concerning this Interrogatory includes any warnings or bulletins that Defendant has ever published or directed to its own employees.

ANSWER: No one person wrote the material.

23. State the names of any expert witness that you intend to rely upon at the trial of this action, and identify the subject matter upon which each said experts will testify, his opinions and the grounds upon which the opinions are based.