

Ans. Goodyear follows document retention policies which provide for the periodic and routine destruction of documents. Consequently, it has been unable to locate any documents which would enable it to answer this Interrogatory, but it will supplement this response in the event such documents should be found.

52. State whether you had knowledge prior to 1972 of any deaths or cases of lung disease or lung impairment among your employees which are or may be attributable to the inhalation of asbestos dust or fibers. If so, please give the number, name and address of such person, together with the dates of treatment and the names and addresses of the doctors who administered treatment to such persons and reports of occupational disease furnished Industrial Commission of the states and attach copies of the latter.

Ans. Goodyear follows document retention policies which provide for the periodic and routine destruction of documents. Consequently, it has been unable to locate any documents which would enable it to answer this Interrogatory, but it will supplement this response in the event such documents should be found. To the best of Goodyear's present information and belief, the answer to this Interrogatory is No.

53. Prior to 1972, did you have any statistical data showing the number of your employees who have been exposed to asbestos dust and fibers for more than ten years who have asbestos-related lung disease or lung impairment? If so, identify the date and provide the figures.

Ans. Goodyear objects to this Interrogatory on the grounds that it presumes the inclusion of asbestos in any product sold by Goodyear created a danger to a user of the product. Without waiving this objection, Goodyear answers that Goodyear follows document retention policies which provide for the periodic and routine destruction of documents. Consequently, it has been unable to locate any documents which would enable it to answer this Interrogatory, but it will supplement this response in the event such documents should be found. To the best of Goodyear's present information and belief, the answer to this Interrogatory is No.


Objecting Attorney