

1 RESPONSE TO INTERROGATORY NO. 105:

2 See Wagner's response to Interrogatory No. 104.

3 INTERROGATORY NO. 106:

4 Please state whether the defendant at any time between
5 1930 and 1972 had an International Division.

6 RESPONSE TO INTERROGATORY NO. 106:

7 Wagner objects to this Interrogatory on the grounds
8 that it is overly broad, unduly burdensome and not calculated to
9 lead to the discovery of admissible evidence.

10 INTERROGATORY NO. 107:

11 If the answer to the preceding interrogatory is affir-
12 mative, please state when the International Division was created
13 and where it has been headquartered from its inception.

14 RESPONSE TO INTERROGATORY NO. 107:

15 Wagner objects to this Interrogatory on the grounds
16 that it is overly broad, unduly burdensome and not calculated to
17 lead to the discovery of admissible evidence.

18 INTERROGATORY NO. 108:

19 Please state whether the defendant has ever had a
20 division which exported raw asbestos or asbestos-containing
21 products. If so, please state whether said division supplied
22 any British manufacturer of motor vehicles or machinery products
23 with any component parts which contained asbestos between the
24 years 1930 and 1972.

25 RESPONSE TO INTERROGATORY NO. 108:

26 See Wagner's response to Interrogatory No. 3.

27 INTERROGATORY NO. 109:

28 Please state whether defendant sold or distributed any
asbestos-containing products to any British repair business or
entity engaged in mechanical repair, or distribution of this
defendant's asbestos-containing mechanical parts for the years
1930 to 1972.

RESPONSE TO INTERROGATORY NO. 109:

No, to the best of Wagner's knowledge.