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.

Objecting Attorney

18. With regard to each order of asbestos products bought from or sold or delivered by you to another company, state whether:

a) You provided other company with specifications concerning the asbestos products sold.

b) The other company provided product specifications to you concerning the asbestos products it ordered from you.

c) You provided or were provided by other company with any advertising or promotional material.

d) You provided or were provided any instructions concerning the proper use of the asbestos material.

e) You provided or were provided any warnings regarding the asbestos products you sold and/or delivered.

f) You provided any warranties concerning the asbestos products.

g) You received any warranties concerning the asbestos products.

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.

19. If any part of Interrogatory 18 is answered in the affirmative, identify each such document by: