

THURMAN HARMON, et al.,

Plaintiffs,

vs.

OWENS CORNING (a/k/a OWENS
CORNING CORPORATION), et al.,

Defendants.

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IN THE DISTRICT COURT

DALLAS COUNTY, TEXAS

298TH JUDICIAL DISTRICT

**DEFENDANT CELANESE LTD'S OBJECTIONS AND RESPONSES TO PLAINTIFF
FIDENCIO ORTA SANCHEZ'S SECOND SET OF ADMISSIONS AND THIRD SET OF
REQUEST FOR PRODUCTION TO DEFENDANT CELANESE, LTD.**

TO: Plaintiff Fidencio Orta Sanchez, by and through his attorney, Chad Cotten,
BARON & BUDD, The Centrum, Suite 1100, 3102 Oak Lawn Avenue, Dallas,
Texas 75219

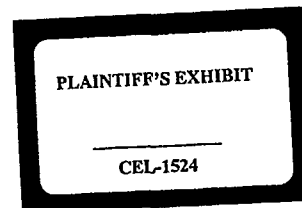
Pursuant to the Texas Rules of Civil Procedure (the "Rules"), Defendant
Celanese Ltd. (referenced herein as "Defendant" or "Celanese") submits these
Responses to Plaintiff Fidencio Orta Sanchez's Second Set of Requests for Admission
and Third Set of Requests for Production to Defendant Celanese Ltd. as follows:

GENERAL RESPONSES, OBJECTIONS AND ASSERTIONS OF PRIVILEGE

Celanese makes the following general objections to each and every request
directed to it

1. Celanese objects to Plaintiff's Instruction No. 1. Celanese may produce
non-privileged responsive documents in the manner in which they are kept in the

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ordinary course of business.

2. Celanese objects to the requests to the extent that they seek to compel the disclosure of information specifically exempted from discovery by the privileges afforded in the Texas Rules of Civil Procedure ("Rules") and Article V. of the Texas Rules of Evidence, including the attorney/client privilege, the joint defense privilege, the attorney work product doctrine, or the investigative privilege. Any withholding of documents or information on the basis of privilege will be specifically noted as part of Celanese's objections and responses after the discovery request calling for such privileged information and/or documents, if any.

3. Celanese objects to paragraph one of the DEFINITIONS regarding "Defendants," "You," "Your," and "Your Company" and paragraph one regarding "persons" because they are overly broad and unduly burdensome and pertain to corporations other than those who are parties to this suit. Celanese also objects to paragraphs one because it includes Celanese's attorneys; information and things protected by the attorney client privilege and work product doctrine are not discoverable.

4. Celanese objects to any discovery request seeking to charge it with knowledge or information held by its "predecessors or subsidiaries" or requiring it to provide information regarding plants other than the ones at which plaintiff Fidencio Orta Sanchez allegedly worked, to wit, the Celanese Bishop, Texas facility. Accordingly, it is

unduly burdensome, excessively expensive and harassing to require Celanese to answer these discovery requests as to all plants, and/or any plant at which plaintiff never worked.

5. Celanese objects to plaintiff's discovery requests to the extent they are unlimited in time.

6. Celanese objects to plaintiff's requests to the extent that they necessarily seek disclosure of trade secrets, proprietary material and other confidential information protected from discovery by the Texas Rules of Civil Procedure.

7. The presence of an objection does not mean that Celanese possesses non-privileged information responsive to a discovery request.

8. Celanese objects to paragraph two of the DEFINITIONS because the definition of the word "document" and the instructions regarding "possession, custody or control" are overly broad, seeks information specifically exempted from discovery by the privileges afforded in the Rules and Rule 503 of the Texas Rules of Evidence, including the attorney work product doctrine, and the attorney client privilege. Throughout these responses, Celanese will assume that the word will have its commonly used meaning, as set forth in Rule 192.3(b), and will respond accordingly.

9. Celanese objects to paragraph six of the DEFINITIONS to the extent information is sought concerning asbestos in a non-friable form.

10. Celanese objects to paragraphs 16 and 17 of the DEFINITIONS because the definition of the word "identify" is overly broad, unduly burdensome and harassing.

11. Celanese objects to the definition of the term "Time Period at Issue" contained in paragraph 21 of the DEFINITIONS because it is presently vague, ambiguous and overly broad. Plaintiff testified in his deposition that his alleged work at the Celanese Bishop facility occurred between the years of 1961 and 1970. Accordingly, where a request incorporates this term, Celanese will respond for the time period of 1961 through 1970.

12. Celanese objects to plaintiff's requests to the extent that they are duplicative and cumulative of discovery requests previously served by plaintiff upon Celanese and to which Celanese has previously responded.

SPECIFIC OBJECTIONS AND RESPONSES TO PLAINTIFF'S SECOND REQUEST FOR ADMISSIONS

REQUEST FOR ADMISSION NO. 1

Admit that Celanese was a member of the Industrial Hygiene Foundation in 1951.

RESPONSE:

Denied

REQUEST FOR ADMISSION NO. 2

Admit that Celanese was a member of the Industrial Hygiene Foundation in 1952.

RESPONSE:

Admitted

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REQUEST FOR ADMISSION NO. 3

Admit that Celanese was a member of the Industrial Hygiene Foundation in 1953.

RESPONSE:

Admitted

REQUEST FOR ADMISSION NO. 4

Admit that Celanese was a member of the Industrial Hygiene Foundation in 1954.

RESPONSE:

Admitted

REQUEST FOR ADMISSION NO. 5

Admit that Celanese was a member of the Industrial Hygiene Foundation in 1955.

RESPONSE:

Admitted

REQUEST FOR ADMISSION NO. 6

Admit that Celanese was a member of the Industrial Hygiene Foundation in 1956.

RESPONSE:

Admitted

REQUEST FOR ADMISSION NO. 7

Admit that Celanese was a member of the Industrial Hygiene Foundation in 1957.

RESPONSE:

Admitted

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REQUEST FOR ADMISSION NO. 8

Admit that Celanese was a member of the Industrial Hygiene Foundation in 1958.

RESPONSE:

Admitted

REQUEST FOR ADMISSION NO. 9

Admit that Celanese was a member of the Industrial Hygiene Foundation in 1959.

RESPONSE:

Admitted

REQUEST FOR ADMISSION NO. 10

Admit that Celanese was a member of the Industrial Hygiene Foundation in 1960.

RESPONSE:

Admitted

REQUEST FOR ADMISSION NO. 11

Admit that Celanese was a member of the Industrial Hygiene Foundation in 1961.

RESPONSE:

Admitted

REQUEST FOR ADMISSION NO. 12

Admit that Celanese was a member of the Industrial Hygiene Foundation in 1962.

RESPONSE:

Admitted

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REQUEST FOR ADMISSION NO. 13

Admit that Celanese was a member of the Industrial Hygiene Foundation in 1963.

RESPONSE:

Admitted

REQUEST FOR ADMISSION NO. 14

Admit that Celanese was a member of the Industrial Hygiene Foundation in 1964.

RESPONSE:

Admitted

REQUEST FOR ADMISSION NO. 15

Admit that Celanese was a member of the Industrial Hygiene Foundation in 1965.

RESPONSE:

Admitted

REQUEST FOR ADMISSION NO. 16

Admit that Celanese was a member of the Industrial Hygiene Foundation in 1966.

RESPONSE:

Admitted

REQUEST FOR ADMISSION NO. 17

Admit that Celanese was a member of the Industrial Hygiene Foundation in 1967.

RESPONSE:

Admitted

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REQUEST FOR ADMISSION NO. 18

Admit that Celanese was a member of the Industrial Hygiene Foundation in 1968.

RESPONSE:

Admitted

REQUEST FOR ADMISSION NO. 19

Admit that Celanese was a member of the Industrial Hygiene Foundation in 1969.

RESPONSE:

Admitted

REQUEST FOR ADMISSION NO. 20

Admit that Celanese was a member of the Industrial Hygiene Foundation in 1970.

RESPONSE:

Admitted

REQUEST FOR ADMISSION NO. 21

Admit that Celanese was a member of the Industrial Hygiene Foundation in 1971.

RESPONSE:

Admitted

REQUEST FOR ADMISSION NO. 22

Admit that Celanese was a member of the National Safety Council in 1951.

RESPONSE:

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Celanese admits that it has been, and remains, a member of the National Safety Council. Although the beginning date of its membership in that organization is presently unknown, on present information and belief, Celanese was a member by at least some time in the mid-1960s.

REQUEST FOR ADMISSION NO. 23

Admit that Celanese was a member of the National Safety Council in 1952.

RESPONSE:

Celanese admits that it has been, and remains, a member of the National Safety Council. Although the beginning date of its membership in that organization is presently unknown, on present information and belief, Celanese was a member by at least some time in the mid-1960s.

REQUEST FOR ADMISSION NO. 24

Admit that Celanese was a member of the National Safety Council in 1953.

RESPONSE:

Celanese admits that it has been, and remains, a member of the National Safety Council. Although the beginning date of its membership in that organization is presently unknown, on present information and belief, Celanese was a member by at least some time in the mid-1960s.

REQUEST FOR ADMISSION NO. 25

Admit that Celanese was a member of the National Safety Council in 1954.

RESPONSE:

Celanese admits that it has been, and remains, a member of the National Safety Council. Although the beginning date of its membership in that organization is presently unknown, on present information and belief, Celanese was a member by at least some time in the mid-1960s.

REQUEST FOR ADMISSION NO. 26

Admit that Celanese was a member of the National Safety Council in 1955.

RESPONSE:

Celanese admits that it has been, and remains, a member of the National Safety Council. Although the beginning date of its membership in that organization is presently unknown, on present information and belief, Celanese was a member by at least some time in the mid-1960s.

REQUEST FOR ADMISSION NO. 27

Admit that Celanese was a member of the National Safety Council in 1956.

RESPONSE:

Celanese admits that it has been, and remains, a member of the National Safety Council. Although the beginning date of its membership in that organization is presently unknown, on present information and belief, Celanese was a member by at least some time in the mid-1960s.

REQUEST FOR ADMISSION NO. 28

Admit that Celanese was a member of the National Safety Council in 1957.

RESPONSE:

Celanese admits that it has been, and remains, a member of the National Safety Council. Although the beginning date of its membership in that organization is presently unknown, on present information and belief, Celanese was a member by at least some time in the mid-1960s.

REQUEST FOR ADMISSION NO. 29

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Admit that Celanese was a member of the National Safety Council in 1958.

RESPONSE:

Celanese admits that it has been, and remains, a member of the National Safety Council. Although the beginning date of its membership in that organization is presently unknown, on present information and belief, Celanese was a member by at least some time in the mid-1960s.

REQUEST FOR ADMISSION NO. 30

Admit that Celanese was a member of the National Safety Council in 1959.

RESPONSE:

Celanese admits that it has been, and remains, a member of the National Safety Council. Although the beginning date of its membership in that organization is presently unknown, on present information and belief, Celanese was a member by at least some time in the mid-1960s.

REQUEST FOR ADMISSION NO. 31

Admit that Celanese was a member of the National Safety Council in 1960.

RESPONSE:

Celanese admits that it has been, and remains, a member of the National Safety Council. Although the beginning date of its membership in that organization is presently unknown, on present information and belief, Celanese was a member by at least some time in the mid-1960s.

REQUEST FOR ADMISSION NO. 32

Admit that Celanese was a member of the National Safety Council in 1961.

RESPONSE:

Celanese admits that it has been, and remains, a member of the National Safety

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Council. Although the beginning date of its membership in that organization is presently unknown, on present information and belief, Celanese was a member by at least some time in the mid-1960s.

REQUEST FOR ADMISSION NO. 33

Admit that Celanese was a member of the National Safety Council in 1962.

RESPONSE:

Celanese admits that it has been, and remains, a member of the National Safety Council. Although the beginning date of its membership in that organization is presently unknown, on present information and belief, Celanese was a member by at least some time in the mid-1960s.

REQUEST FOR ADMISSION NO. 34

Admit that Celanese was a member of the National Safety Council in 1963.

RESPONSE:

Celanese admits that it has been, and remains, a member of the National Safety Council. Although the beginning date of its membership in that organization is presently unknown, on present information and belief, Celanese was a member by at least some time in the mid-1960s.

REQUEST FOR ADMISSION NO. 35

Admit that Celanese was a member of the National Safety Council in 1964.

RESPONSE:

Celanese admits that it has been, and remains, a member of the National Safety Council. Although the beginning date of its membership in that organization is presently unknown, on present information and belief, Celanese was a member by at least some time in the mid-1960s.

REQUEST FOR ADMISSION NO. 36

Admit that Celanese was a member of the National Safety Council in 1965.

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RESPONSE:

Celanese admits that it has been, and remains, a member of the National Safety Council. Although the beginning date of its membership in that organization is presently unknown, on present information and belief, Admitted.

REQUEST FOR ADMISSION NO. 37

Admit that Celanese was a member of the National Safety Council in 1966.

RESPONSE:

Celanese admits that it has been, and remains, a member of the National Safety Council. Although the beginning date of its membership in that organization is presently unknown, on present information and belief, Admitted.

REQUEST FOR ADMISSION NO. 38

Admit that Celanese was a member of the National Safety Council in 1967.

RESPONSE:

Celanese admits that it has been, and remains, a member of the National Safety Council. Although the beginning date of its membership in that organization is presently unknown, on present information and belief, Admitted.

REQUEST FOR ADMISSION NO. 39

Admit that Celanese was a member of the National Safety Council in 1968.

RESPONSE:

Celanese admits that it has been, and remains, a member of the National Safety Council. Although the beginning date of its membership in that organization is presently unknown, on present information and belief, Admitted.

REQUEST FOR ADMISSION NO. 40

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Admit that Celanese was a member of the National Safety Council in 1969.

RESPONSE:

Celanese admits that it has been, and remains, a member of the National Safety Council. Although the beginning date of its membership in that organization is presently unknown, on present information and belief, Admitted.

REQUEST FOR ADMISSION NO. 41

Admit that Celanese was a member of the National Safety Council in 1970.

RESPONSE:

Celanese admits that it has been, and remains, a member of the National Safety Council. Although the beginning date of its membership in that organization is presently unknown, on present information and belief, Admitted.

REQUEST FOR ADMISSION NO. 42

Admit that Celanese was a member of the Manufacturing Chemistry Association in 1966.

RESPONSE:

On present information and belief, Admitted.

REQUEST FOR ADMISSION NO. 43

Admit that Celanese was a member of the Manufacturing Chemistry Association in 1967.

RESPONSE:

On present information and belief, Admitted..

REQUEST FOR ADMISSION NO. 44

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Admit that Celanese was a member of the Manufacturing Chemistry Association in 1968.

RESPONSE:

On present information and belief, Admitted.

REQUEST FOR ADMISSION NO. 45

Admit that Celanese was a member of the Manufacturing Chemistry Association in 1969.

RESPONSE:

On present information and belief, Admitted.

REQUEST FOR ADMISSION NO. 46

Admit that Celanese was a member of the Manufacturing Chemistry Association in 1970.

RESPONSE:

On present information and belief, Admitted.

REQUEST FOR ADMISSION NO. 47

Admit that a case of pnuemonoconiosis was reported by a Celanese employee in 1951.

RESPONSE:

Celanese admits that in or around 1951 an employee at a plant other than the one at issue in this case did report an alleged dust-related illness, but the specific illness he reported he purportedly had was silicosis and was not an injury in any way related to alleged asbestos exposure.

REQUEST FOR ADMISSION NO. 48

Admit that Celanese did not employed any industrial hygienists before 1966.

RESPONSE:

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Celanese objects to this request on the grounds that it is overly broad in that it is not properly limited to the plant at issue in this litigation. Celanese further objects to this request on the grounds that it seeks information that is irrelevant and not reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving the foregoing general and specific objections, Celanese admits only that it had an industrial hygienist on its direct company payroll before 1966 although Celanese obtained industrial hygiene services from its insurance carriers prior to that time.

REQUEST FOR ADMISSION NO. 49

Admit that Charles Laubly was the only industrial hygienist employed by Celanese from 1966-1970.

RESPONSE:

Celanese objects to this request on the grounds that it is overly broad in that it is not properly limited to the plant at issue in this litigation. Celanese further objects to this request on the grounds that it seeks information that is irrelevant and not reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving the foregoing general and specific objections, denied as stated. Although Mr. Laubly was the only individual with the formal title of "industrial hygienist", others within the company performed industrial hygiene related activities during the stated time period.

REQUEST FOR ADMISSION NO. 50

Admit that Charles Laubly was the only industrial hygienist employed by Celanese until the mid 1970's.

RESPONSE:

Celanese objects to this request on the grounds that it is overly broad in that it is not properly limited to the plant at issue in this litigation. Celanese further objects to this request on the grounds that it seeks information that is irrelevant and not reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving the foregoing general and specific objections, denied as stated. Although Mr. Laubly was the only individual with the formal title of "industrial

hygienist", others within the company performed industrial hygiene related activities during the stated time period.

REQUEST FOR ADMISSION NO. 51

Admit that Charles Laubly provided industrial hygiene services for all Celanese facilities from 1966-1970.

RESPONSE:

Celanese objects to this request on the grounds that it is overly broad in that it is not properly limited to the plant at issue in this litigation. Celanese further objects to this request on the grounds that it seeks information that is irrelevant and not reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving the foregoing general and specific objections Celanese admits only that Mr. Laubly performed industrial hygiene services at Celanese's various facilities during the stated time period.

REQUEST FOR ADMISSION NO. 52

Admit that Celanese was aware of the 1958 Texas workplace regulations concerning airborne dust in 1960.

RESPONSE:

Due to the passage of time, Celanese can neither admit or deny this request.

REQUEST FOR ADMISSION NO. 53

Admit that Celanese did not have any company-wide policy for handling asbestos from 1959-1972.

RESPONSE:

Celanese objects to this request as overly broad in that it is not limited to the time period at issue in this litigation and thus seeks information not relevant to this litigation. Further, Celanese objects to this request as it is based upon an improper premise and in that it assumes facts not in evidence.

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Subject to and without waiving this or any other specific or general objection, Celanese admits only that, consistent with medical knowledge and American industry standards at that period, it did not have a company-wide policy for the handling of finished asbestos-containing products until the time the first OSHA asbestos standards came into effect.

REQUEST FOR ADMISSION NO. 54

Admit that Celanese did not have a program to train its employees about airborne dust hazards in 1959.

RESPONSE:

Celanese objects to this request as overly broad in that it seeks information outside of the time period at issue in this litigation and further in that it is not limited to the specific Celanese facility at issue in this litigation. The request therefore seeks information that is neither relevant nor reasonable calculated to lead to the discovery of admissible evidence.

REQUEST FOR ADMISSION NO. 55

Admit that Celanese did not have a program to train its employees about airborne dust hazards in 1960.

RESPONSE:

Celanese objects to this request as overly broad in that it seeks information outside of the time period at issue in this litigation and further in that it is not limited to the specific Celanese facility at issue in this litigation. The request therefore seeks information that is neither relevant nor reasonable calculated to lead to the discovery of admissible evidence.

REQUEST FOR ADMISSION NO. 56

Admit that Celanese did not have a program to train its employees about airborne dust hazards in 1961.

RESPONSE:

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Celanese objects to this request as overly broad in that it is not limited to the Celanese facility at issue in this litigation. Furthermore, this request seeks information with regards to programs for Celanese employee and not contractor employees like plaintiff.

Subject to and without waiving this or any other specific or general objection, Celanese denies this request as stated.

REQUEST FOR ADMISSION NO. 57

Admit that Celanese did not have a program to train its employees about airborne dust hazards in 1962.

RESPONSE:

Celanese objects to this request as overly broad in that it is not limited to the Celanese facility at issue in this litigation. Furthermore, this request seeks information with regards to programs for Celanese employee and not contractor employees like plaintiff.

Subject to and without waiving the foregoing general and specific objections, Celanese denies this request as stated.

REQUEST FOR ADMISSION NO. 58

Admit that Celanese did not have a program to train its employees about airborne dust hazards in 1963.

RESPONSE:

Celanese objects to this request as overly broad in that it is not limited to the Celanese facility at issue in this litigation. Furthermore, this request seeks information with regards to programs for Celanese employee and not contractor employees like plaintiff.

Subject to and without waiving this or any other specific or general objection, Celanese denies this request as stated.

REQUEST FOR ADMISSION NO. 59

Admit that Celanese did not have a program to train its employees about airborne dust hazards in 1964.

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RESPONSE:

Celanese objects to this request as overly broad in that it is not limited to the Celanese facility at issue in this litigation. Furthermore, this request seeks information with regards to programs for Celanese employee and not contractor employees like plaintiff.

Subject to and without waiving this or any other specific or general objection, Celanese denies this request as stated.

REQUEST FOR ADMISSION NO. 60

Admit that Celanese did not have a program to train its employees about airborne dust hazards in 1965.

RESPONSE:

Celanese objects to this request as overly broad in that it is not limited to the Celanese facility at issue in this litigation. Furthermore, this request seeks information with regards to programs for Celanese employee and not contractor employees like plaintiff.

Subject to and without waiving this or any other specific or general objection, Celanese denies this request as stated.

REQUEST FOR ADMISSION NO. 61

Admit that Celanese did not have a program to train its employees about airborne dust hazards in 1966.

RESPONSE:

Celanese objects to this request as overly broad in that it is not limited to the Celanese facility at issue in this litigation. Furthermore, this request seeks information with regards to programs for Celanese employee and not contractor employees like plaintiff.

Subject to and without waiving this or any other specific or general objection, Celanese denies this request as stated.

REQUEST FOR ADMISSION NO. 62

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Admit that Celanese did not have a program to train its employees about airborne dust hazards in 1967.

RESPONSE:

Celanese objects to this request as overly broad in that it is not limited to the Celanese facility at issue in this litigation. Furthermore, this request seeks information with regards to programs for Celanese employee and not contractor employees like plaintiff.

Subject to and without waiving this or any other specific or general objection, Celanese denies this request as stated.

REQUEST FOR ADMISSION NO. 63

Admit that Celanese did not have a program to train its employees about airborne dust hazards in 1968.

RESPONSE:

Celanese objects to this request as overly broad in that it is not limited to the Celanese facility at issue in this litigation. Furthermore, this request seeks information with regards to programs for Celanese employee and not contractor employees like plaintiff.

Subject to and without waiving this or any other specific or general objection, Celanese denies this request as stated.

REQUEST FOR ADMISSION NO. 64

Admit that Celanese did not have a program to train its employees about airborne dust hazards in 1969.

RESPONSE:

Celanese objects to this request as overly broad in that it is not limited to the Celanese facility at issue in this litigation. Furthermore, this request seeks information with regards to programs for Celanese employee and not contractor employees like plaintiff.

Subject to and without waiving this or any other specific or general objection, Celanese

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denies this request as stated.

REQUEST FOR ADMISSION NO. 65

Admit that Celanese did not have a program to train its employees about airborne dust hazards in 1970.

RESPONSE:

Celanese objects to this request as overly broad in that it is not limited to the Celanese facility at issue in this litigation. Furthermore, this request seeks information with regards to programs for Celanese employee and not contractor employees like plaintiff.

Subject to and without waiving this or any other specific or general objection, Celanese denies this request as stated.

REQUEST FOR ADMISSION NO. 66

Admit that Celanese did not have a program to train its employees about airborne dust hazards in 1971.

RESPONSE:

Celanese objects to this request as overly broad in that it is not limited to the Celanese facility at issue in this litigation. Furthermore, this request seeks information with regards to programs for Celanese employee and not contractor employees like plaintiff.

Subject to and without waiving this or any other specific or general objection, Celanese denies this request as stated.

REQUEST FOR ADMISSION NO. 67

Admit that Celanese did not have a program to train its employees about airborne dust hazards in 1972.

RESPONSE:

Celanese objects to this request as overly broad in that it seeks information outside the time period at issue in this litigation. Further, the request is overly broad in that it is not

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limited to the Celanese facility at issue in this litigation.

REQUEST FOR ADMISSION NO. 68

Admit that Celanese did not have a program to train contractor employees about airborne dust hazards in 1959.

RESPONSE:

Celanese objects to this request as overly broad in that it seeks information outside the time period at issue in this litigation. Further, the request is overly broad in that it is not limited to the Celanese facility at issue in this litigation.

REQUEST FOR ADMISSION NO. 69

Admit that Celanese did not have a program to train contractor employees about airborne dust hazards in 1960.

RESPONSE:

Celanese objects to this request as overly broad in that it seeks information outside the time period at issue in this litigation. Further, the request is overly broad in that it is not limited to the Celanese facility at issue in this litigation.

REQUEST FOR ADMISSION NO. 70

Admit that Celanese did not have a program to train contractor employees about airborne dust hazards in 1961.

RESPONSE:

Celanese objects to this request as overly broad in that it is not limited to the Celanese facility at issue in this litigation and thus seeks information not relevant to this litigation.

Subject to and without waiving this or any other specific or general objection, Celanese can neither admit or deny this request as stated. Although Celanese had no duty to provide such training to independent contractor companies, Celanese cannot say what information regarding general dust control it may have passed on to contractor companies although it believes that such contractors, like Celanese, were knowledgeable about using suitable care when working around high concentrations of

dust, to include the use of respiratory protection and other dust control measures as the contractors deemed appropriate.

REQUEST FOR ADMISSION NO. 71

Admit that Celanese did not have a program to train contractor employees about airborne dust hazards in 1962.

RESPONSE:

Celanese objects to this request as overly broad in that it is not limited to the Celanese facility at issue in this litigation and thus seeks information not relevant to this litigation.

Subject to and without waiving this or any other specific or general objection, Celanese can neither admit or deny this request as stated. Although Celanese had no duty to provide such training to independent contractor companies, Celanese cannot say what information regarding general dust control it may have passed on to contractor companies although it believes that such contractors, like Celanese, were knowledgeable about using suitable care when working around high concentrations of dust, to include the use of respiratory protection and other dust control measures as the contractors deemed appropriate.

REQUEST FOR ADMISSION NO. 72

Admit that Celanese did not have a program to train contractor employees about airborne dust hazards in 1963.

RESPONSE:

Celanese objects to this request as overly broad in that it is not limited to the Celanese facility at issue in this litigation and thus seeks information not relevant to this litigation.

Subject to and without waiving this or any other specific or general objection, Celanese can neither admit or deny this request as stated. Although Celanese had no duty to provide such training to independent contractor companies, Celanese cannot say what information regarding general dust control it may have passed on to contractor companies although it believes that such contractors, like Celanese, were knowledgeable about using suitable care when working around high concentrations of

dust, to include the use of respiratory protection and other dust control measures as the contractors deemed appropriate.

REQUEST FOR ADMISSION NO. 73

Admit that Celanese did not have a program to train contractor employees about airborne dust hazards in 1964.

RESPONSE:

Celanese objects to this request as overly broad in that it is not limited to the Celanese facility at issue in this litigation and thus seeks information not relevant to this litigation.

Subject to and without waiving this or any other specific or general objection, Celanese can neither admit or deny this request as stated. Although Celanese had no duty to provide such training to independent contractor companies, Celanese cannot say what information regarding general dust control it may have passed on to contractor companies although it believes that such contractors, like Celanese, were knowledgeable about using suitable care when working around high concentrations of dust, to include the use of respiratory protection and other dust control measures as the contractors deemed appropriate.

REQUEST FOR ADMISSION NO. 74

Admit that Celanese did not have a program to train contractor employees about airborne dust hazards in 1965.

RESPONSE:

Celanese objects to this request as overly broad in that it is not limited to the Celanese facility at issue in this litigation and thus seeks information not relevant to this litigation.

Subject to and without waiving this or any other specific or general objection, Celanese can neither admit or deny this request as stated. Although Celanese had no duty to provide such training to independent contractor companies, Celanese cannot say what information regarding general dust control it may have passed on to contractor companies although it believes that such contractors, like Celanese, were knowledgeable about using suitable care when working around high concentrations of dust, to include the use of respiratory protection and other dust control measures as the

contractors deemed appropriate.

REQUEST FOR ADMISSION NO. 75

Admit that Celanese did not have a program to train contractor employees about airborne dust hazards in 1966.

RESPONSE:

Celanese objects to this request as overly broad in that it is not limited to the Celanese facility at issue in this litigation and thus seeks information not relevant to this litigation.

Subject to and without waiving this or any other specific or general objection, Celanese can neither admit or deny this request as stated. Although Celanese had no duty to provide such training to independent contractor companies, Celanese cannot say what information regarding general dust control it may have passed on to contractor companies although it believes that such contractors, like Celanese, were knowledgeable about using suitable care when working around high concentrations of dust, to include the use of respiratory protection and other dust control measures as the contractors deemed appropriate.

REQUEST FOR ADMISSION NO. 76

Admit that Celanese did not have a program to train contractor employees about airborne dust hazards in 1967.

RESPONSE:

Celanese objects to this request as overly broad in that it is not limited to the Celanese facility at issue in this litigation and thus seeks information not relevant to this litigation.

Subject to and without waiving this or any other specific or general objection, Celanese can neither admit or deny this request as stated. Although Celanese had no duty to provide such training to independent contractor companies, Celanese cannot say what information regarding general dust control it may have passed on to contractor companies although it believes that such contractors, like Celanese, were knowledgeable about using suitable care when working around high concentrations of dust, to include the use of respiratory protection and other dust control measures as the contractors deemed appropriate.

REQUEST FOR ADMISSION NO. 77

Admit that Celanese did not have a program to train contractor employees about airborne dust hazards in 1968.

RESPONSE:

Celanese objects to this request as overly broad in that it is not limited to the Celanese facility at issue in this litigation and thus seeks information not relevant to this litigation.

Subject to and without waiving this or any other specific or general objection, Celanese can neither admit or deny this request as stated. Although Celanese had no duty to provide such training to independent contractor companies, Celanese cannot say what information regarding general dust control it may have passed on to contractor companies although it believes that such contractors, like Celanese, were knowledgeable about using suitable care when working around high concentrations of dust, to include the use of respiratory protection and other dust control measures as the contractors deemed appropriate.

REQUEST FOR ADMISSION NO. 78

Admit that Celanese did not have a program to train contractor employees about airborne dust hazards in 1969.

RESPONSE:

Celanese objects to this request as overly broad in that it is not limited to the Celanese facility at issue in this litigation and thus seeks information not relevant to this litigation.

Subject to and without waiving this or any other specific or general objection, Celanese can neither admit or deny this request as stated. Although Celanese had no duty to provide such training to independent contractor companies, Celanese cannot say what information regarding general dust control it may have passed on to contractor companies although it believes that such contractors, like Celanese, were knowledgeable about using suitable care when working around high concentrations of dust, to include the use of respiratory protection and other dust control measures as the contractors deemed appropriate.

REQUEST FOR ADMISSION NO. 79

Admit that Celanese did not have a program to train contractor employees about airborne dust hazards in 1970.

RESPONSE:

Celanese objects to this request as overly broad in that it is not limited to the Celanese facility at issue in this litigation and thus seeks information not relevant to this litigation.

Subject to and without waiving this or any other specific or general objection, Celanese can neither admit or deny this request as stated. Although Celanese had no duty to provide such training to independent contractor companies, Celanese cannot say what information regarding general dust control it may have passed on to contractor companies although it believes that such contractors, like Celanese, were knowledgeable about using suitable care when working around high concentrations of dust, to include the use of respiratory protection and other dust control measures as the contractors deemed appropriate.

REQUEST FOR ADMISSION NO. 80

Admit that Celanese did not have a program to train contractor employees about airborne dust hazards in 1971.

RESPONSE:

Celanese objects to this request as overly broad in that it is not limited to the Celanese facility at issue in this litigation and thus seeks information not relevant to this litigation.

Subject to and without waiving this or any other specific or general objection, Celanese can neither admit or deny this request as stated. Although Celanese had no duty to provide such training to independent contractor companies, Celanese cannot say what information regarding general dust control it may have passed on to contractor companies although it believes that such contractors, like Celanese, were knowledgeable about using suitable care when working around high concentrations of dust, to include the use of respiratory protection and other dust control measures as the contractors deemed appropriate.

REQUEST FOR ADMISSION NO. 81

Admit that Celanese did not have a program to train contractor employees about airborne dust hazards in 1972.

RESPONSE:

Celanese objects to this request as overly broad in that it seeks information outside the time period at issue in this litigation. Further, the request is overly broad in that it is not limited to the Celanese facility at issue in this litigation.

REQUEST FOR ADMISSION NO. 82

Admit that Celanese did not have any x-ray program to monitor pneumoconiosis in its employees in 1959.

RESPONSE:

Celanese objects to this request as overly broad in that it seeks information outside of the time period at issue in this litigation and further in that it is not limited to the specific Celanese facility at issue in this litigation. The request therefore calls for information not relevant to this litigation.

REQUEST FOR ADMISSION NO. 83

Admit that Celanese did not have any x-ray program to monitor pneumoconiosis in its employees in 1960.

RESPONSE:

Celanese objects to this request as overly broad in that it seeks information outside of the time period at issue in this litigation and further in that it is not limited to the specific Celanese facility at issue in this litigation. The request therefore calls for information not relevant to this litigation.

REQUEST FOR ADMISSION NO. 84

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Admit that Celanese did not have any x-ray program to monitor pneumoconiosis in its employees in 1961.

RESPONSE:

Celanese objects to this request as overly broad in that it is not limited to the Celanese facility at issue in this litigation and thus seeks information not relevant to this litigation. Further, this request seeks information with regard to programs for Celanese employees and not as to contractors like plaintiff in this case.

Subject to and without waiving this or any other specific or general objection, Celanese denies this request as stated.

REQUEST FOR ADMISSION NO. 85

Admit that Celanese did not have any x-ray program to monitor pneumoconiosis in its employees in 1962.

RESPONSE:

Celanese objects to this request as overly broad in that it is not limited to the Celanese facility at issue in this litigation and thus seeks information not relevant to this litigation. Further, this request seeks information with regard to programs for Celanese employees and not as to contractors like plaintiff in this case.

Subject to and without waiving this or any other specific or general objection, Celanese denies this request as stated.

REQUEST FOR ADMISSION NO. 86

Admit that Celanese did not have any x-ray program to monitor pneumoconiosis in its employees in 1963.

RESPONSE:

Celanese objects to this request as overly broad in that it is not limited to the Celanese

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facility at issue in this litigation and thus seeks information not relevant to this litigation. Further, this request seeks information with regard to programs for Celanese employees and not as to contractors like plaintiff in this case.

Subject to and without waiving this or any other specific or general objection, Celanese denies this request as stated.

REQUEST FOR ADMISSION NO. 87

Admit that Celanese did not have any x-ray program to monitor pneumoconiosis in its employees in 1964.

RESPONSE:

Celanese objects to this request as overly broad in that it is not limited to the Celanese facility at issue in this litigation and thus seeks information not relevant to this litigation. Further, this request seeks information with regard to programs for Celanese employees and not as to contractors like plaintiff in this case.

Subject to and without waiving this or any other specific or general objection, Celanese denies this request as stated.

REQUEST FOR ADMISSION NO. 88

Admit that Celanese did not have any x-ray program to monitor pneumoconiosis in its employees in 1965.

RESPONSE:

Celanese objects to this request as overly broad in that it is not limited to the Celanese facility at issue in this litigation and thus seeks information not relevant to this litigation. Further, this request seeks information with regard to programs for Celanese employees and not as to contractors like plaintiff in this case.

Subject to and without waiving this or any other specific or general objection, Celanese denies this request as stated.

REQUEST FOR ADMISSION NO. 89

Admit that Celanese did not have any x-ray program to monitor pneumoconiosis in its employees in 1966.

RESPONSE:

Celanese objects to this request as overly broad in that it is not limited to the Celanese facility at issue in this litigation and thus seeks information not relevant to this litigation. Further, this request seeks information with regard to programs for Celanese employees and not as to contractors like plaintiff in this case.

Subject to and without waiving this or any other specific or general objection, Celanese denies this request as stated.

REQUEST FOR ADMISSION NO. 90

Admit that Celanese did not have any x-ray program to monitor pneumoconiosis in its employees in 1967.

RESPONSE:

Celanese objects to this request as overly broad in that it is not limited to the Celanese facility at issue in this litigation and thus seeks information not relevant to this litigation. Further, this request seeks information with regard to programs for Celanese employees and not as to contractors like plaintiff in this case.

Subject to and without waiving this or any other specific or general objection, Celanese denies this request as stated.

REQUEST FOR ADMISSION NO. 91

Admit that Celanese did not have any x-ray program to monitor pneumoconiosis in its employees in 1968.

RESPONSE:

Celanese objects to this request as overly broad in that it is not limited to the Celanese facility at issue in this litigation and thus seeks information not relevant to this litigation.

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Further, this request seeks information with regard to programs for Celanese employees and not as to contractors like plaintiff in this case.

Subject to and without waiving this or any other specific or general objection, Celanese denies this request as stated.

REQUEST FOR ADMISSION NO. 92

Admit that Celanese did not have any x-ray program to monitor pneumoconiosis in its employees in 1969.

RESPONSE:

Celanese objects to this request as overly broad in that it is not limited to the Celanese facility at issue in this litigation and thus seeks information not relevant to this litigation. Further, this request seeks information with regard to programs for Celanese employees and not as to contractors like plaintiff in this case.

Subject to and without waiving this or any other specific or general objection, Celanese denies this request as stated.

REQUEST FOR ADMISSION NO. 93

Admit that Celanese did not have any x-ray program to monitor pneumoconiosis in its employees in 1970.

RESPONSE:

Celanese objects to this request as overly broad in that it is not limited to the Celanese facility at issue in this litigation and thus seeks information not relevant to this litigation. Further, this request seeks information with regard to programs for Celanese employees and not as to contractors like plaintiff in this case.

Subject to and without waiving this or any other specific or general objection, Celanese denies this request as stated.

REQUEST FOR ADMISSION NO. 94

Admit that Celanese did not have any x-ray program to monitor pneumoconiosis in its

employees in 1971.

RESPONSE:

Celanese objects to this request as overly broad in that it is not limited to the Celanese facility at issue in this litigation and thus seeks information not relevant to this litigation. Further, this request seeks information with regard to programs for Celanese employees and not as to contractors like plaintiff in this case.

Subject to and without waiving this or any other specific or general objection, Celanese denies this request as stated.

REQUEST FOR ADMISSION NO. 95

Admit that Celanese did not have any x-ray program to monitor pneumoconiosis in its employees in 1972.

RESPONSE:

Celanese objects to this request as overly broad in that it seeks information outside the time period at issue in this litigation. Further, the request is overly broad in that it is not limited to the Celanese facility at issue in this litigation.

REQUEST FOR ADMISSION NO. 96

Admit that Celanese did not have any x-ray program to monitor pneumoconiosis in contractor employees in 1959.

RESPONSE:

Celanese objects to this request as overly broad in that it seeks information outside the time period at issue in this litigation. Further, the request is overly broad in that it is not limited to the Celanese facility at issue in this litigation.

REQUEST FOR ADMISSION NO. 97

Admit that Celanese did not have any x-ray program to monitor pneumoconiosis in contractor employees in 1960.

RESPONSE:

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Celanese objects to this request as overly broad in that it seeks information outside the time period at issue in this litigation. Further, the request is overly broad in that it is not limited to the Celanese facility at issue in this litigation.

REQUEST FOR ADMISSION NO. 98

Admit that Celanese did not have any x-ray program to monitor pneumoconiosis in contractor employees in 1961.

RESPONSE:

Celanese objects to this request as overly broad in that it is not limited to the Celanese facility at issue in this litigation and thus seeks information not relevant to this litigation.

Subject to and without waiving this or any other specific or general objection, Celanese admits this request but denies that it had any duty to provide such services to independent contractor companies. Celanese further states in connection with this response, that the obligation, if any, to provide x-ray programs for independent contractor employees would have rested with the independent contractor companies that employed them.

REQUEST FOR ADMISSION NO. 99

Admit that Celanese did not have any x-ray program to monitor pneumoconiosis in contractor employees in 1962.

RESPONSE:

Celanese objects to this request as overly broad in that it is not limited to the Celanese facility at issue in this litigation and thus seeks information not relevant to this litigation.

Subject to and without waiving this or any other specific or general objection, Celanese admits this request but denies that it had any duty to provide such services to independent contractor companies. Celanese further states in connection with this response, that the obligation, if any, to provide x-ray programs for independent contractor employees would have rested with the independent contractor companies that employed them.

REQUEST FOR ADMISSION NO. 100

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for Production to Defendant Celanese Ltd.

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Admit that Celanese did not have any x-ray program to monitor pneumoconiosis in contractor employees in 1963.

RESPONSE:

Celanese objects to this request as overly broad in that it is not limited to the Celanese facility at issue in this litigation and thus seeks information not relevant to this litigation.

Subject to and without waiving this or any other specific or general objection, Celanese admits this request but denies that it had any duty to provide such services to independent contractor companies. Celanese further states in connection with this response, that the obligation, if any, to provide x-ray programs for independent contractor employees would have rested with the independent contractor companies that employed them.

REQUEST FOR ADMISSION NO. 101

Admit that Celanese did not have any x-ray program to monitor pneumoconiosis in contractor employees in 1964.

RESPONSE:

Celanese objects to this request as overly broad in that it is not limited to the Celanese facility at issue in this litigation and thus seeks information not relevant to this litigation.

Subject to and without waiving this or any other specific or general objection, Celanese admits this request but denies that it had any duty to provide such services to independent contractor companies. Celanese further states in connection with this response, that the obligation, if any, to provide x-ray programs for independent contractor employees would have rested with the independent contractor companies that employed them.

REQUEST FOR ADMISSION NO. 102

Admit that Celanese did not have any x-ray program to monitor pneumoconiosis in contractor employees in 1965.

RESPONSE:

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Celanese objects to this request as overly broad in that it is not limited to the Celanese facility at issue in this litigation and thus seeks information not relevant to this litigation.

Subject to and without waiving this or any other specific or general objection, Celanese admits this request but denies that it had any duty to provide such services to independent contractor companies. Celanese further states in connection with this response, that the obligation, if any, to provide x-ray programs for independent contractor employees would have rested with the independent contractor companies that employed them.

REQUEST FOR ADMISSION NO. 103

Admit that Celanese did not have any x-ray program to monitor pneumoconiosis in contractor employees in 1966.

RESPONSE:

Celanese objects to this request as overly broad in that it is not limited to the Celanese facility at issue in this litigation and thus seeks information not relevant to this litigation.

Subject to and without waiving this or any other specific or general objection, Celanese admits this request but denies that it had any duty to provide such services to independent contractor companies. Celanese further states in connection with this response, that the obligation, if any, to provide x-ray programs for independent contractor employees would have rested with the independent contractor companies that employed them.

REQUEST FOR ADMISSION NO. 104

Admit that Celanese did not have any x-ray program to monitor pneumoconiosis in contractor employees in 1967.

RESPONSE:

Celanese objects to this request as overly broad in that it is not limited to the Celanese facility at issue in this litigation and thus seeks information not relevant to this litigation.

Subject to and without waiving this or any other specific or general objection, Celanese admits this request but denies that it had any duty to provide such services to independent contractor companies. Celanese further states in connection with this response, that the obligation, if any, to provide x-ray programs for independent contractor employees would have rested with the independent contractor companies that employed them.

REQUEST FOR ADMISSION NO. 105

Admit that Celanese did not have any x-ray program to monitor pneumoconiosis in contractor employees in 1968.

RESPONSE:

Celanese objects to this request as overly broad in that it is not limited to the Celanese facility at issue in this litigation and thus seeks information not relevant to this litigation.

Subject to and without waiving this or any other specific or general objection, Celanese admits this request but denies that it had any duty to provide such services to independent contractor companies. Celanese further states in connection with this response, that the obligation, if any, to provide x-ray programs for independent contractor employees would have rested with the independent contractor companies that employed them.

REQUEST FOR ADMISSION NO. 106

Admit that Celanese did not have any x-ray program to monitor pneumoconiosis in contractor employees in 1969.

RESPONSE:

Celanese objects to this request as overly broad in that it is not limited to the Celanese facility at issue in this litigation and thus seeks information not relevant to this litigation.

Subject to and without waiving this or any other specific or general objection, Celanese admits this request but denies that it had any duty to provide such services to independent contractor companies. Celanese further states in connection with this response, that the obligation, if any, to provide x-ray programs for independent contractor employees would have rested with the independent contractor companies

that employed them.

REQUEST FOR ADMISSION NO. 107

Admit that Celanese did not have any x-ray program to monitor pneumoconiosis in contractor employees in 1970.

RESPONSE:

Celanese objects to this request as overly broad in that it is not limited to the Celanese facility at issue in this litigation and thus seeks information not relevant to this litigation.

Subject to and without waiving this or any other specific or general objection, Celanese admits this request but denies that it had any duty to provide such services to independent contractor companies. Celanese further states in connection with this response, that the obligation, if any, to provide x-ray programs for independent contractor employees would have rested with the independent contractor companies that employed them.

REQUEST FOR ADMISSION NO. 108

Admit that Celanese did not have any x-ray program to monitor pneumoconiosis in contractor employees in 1971.

RESPONSE:

Celanese objects to this request as overly broad in that it is not limited to the Celanese facility at issue in this litigation and thus seeks information not relevant to this litigation.

Subject to and without waiving this or any other specific or general objection, Celanese admits this request but denies that it had any duty to provide such services to independent contractor companies. Celanese further states in connection with this response, that the obligation, if any, to provide x-ray programs for independent contractor employees would have rested with the independent contractor companies that employed them.

REQUEST FOR ADMISSION NO. 109

Admit that Celanese did not have any x-ray program to monitor pneumoconiosis in contractor employees in 1972.

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RESPONSE:

Celanese objects to this request as overly broad in that it seeks information outside the time period at issue in this litigation. Further, the request is overly broad in that it is not limited to the Celanese facility at issue in this litigation.

REQUEST FOR ADMISSION NO. 110

Admit that Celanese did not have any program to prevent employees from contracting asbestosis in 1959.

RESPONSE:

Celanese objects to this request as overly broad in that it seeks information outside of the time period at issue in this litigation and further in that it is not limited to the specific Celanese facility at issue in this litigation. The request therefore calls for information not relevant to this litigation.

REQUEST FOR ADMISSION NO. 111

Admit that Celanese did not have any program to prevent employees from contracting asbestosis in 1960.

RESPONSE:

Celanese objects to this request as overly broad in that it seeks information outside of the time period at issue in this litigation and further in that it is not limited to the specific Celanese facility at issue in this litigation. The request therefore calls for information not relevant to this litigation.

REQUEST FOR ADMISSION NO. 112

Admit that Celanese did not have any program to prevent employees from contracting asbestosis in 1961

RESPONSE:

Celanese objects to this request in that it is vague and ambiguous. Further, this request is overly broad in that it is not limited to the Celanese facility at issue in this litigation.

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The request also seeks information regarding programs for Celanese employees as opposed to contractors like plaintiff and thus calls for information not relevant to this litigation.

Subject to and without waiving this or any other specific or general objection, Celanese denies this request as stated.

REQUEST FOR ADMISSION NO. 113

Admit that Celanese did not have any program to prevent employees from contracting asbestosis in 1962

RESPONSE:

Celanese objects to this request in that it is vague and ambiguous. Further, this request is overly broad in that it is not limited to the Celanese facility at issue in this litigation. The request also seeks information regarding programs for Celanese employees as opposed to contractors like plaintiff and thus calls for information not relevant to this litigation.

Subject to and without waiving this or any other specific or general objection, Celanese denies this request as stated.

REQUEST FOR ADMISSION NO. 114

Admit that Celanese did not have any program to prevent employees from contracting asbestosis in 1963.

RESPONSE:

Celanese objects to this request in that it is vague and ambiguous. Further, this request is overly broad in that it is not limited to the Celanese facility at issue in this litigation. The request also seeks information regarding programs for Celanese employees as opposed to contractors like plaintiff and thus calls for information not relevant to this litigation.

Subject to and without waiving this or any other specific or general objection, Celanese denies this request as stated.

REQUEST FOR ADMISSION NO. 115

Admit that Celanese did not have any program to prevent employees from contracting asbestosis in 1964

RESPONSE:

Celanese objects to this request in that it is vague and ambiguous. Further, this request is overly broad in that it is not limited to the Celanese facility at issue in this litigation. The request also seeks information regarding programs for Celanese employees as opposed to contractors like plaintiff and thus calls for information not relevant to this litigation.

Subject to and without waiving this or any other specific or general objection, Celanese denies this request as stated.

REQUEST FOR ADMISSION NO. 116

Admit that Celanese did not have any program to prevent employees from contracting asbestosis in 1965.

RESPONSE:

Celanese objects to this request in that it is vague and ambiguous. Further, this request is overly broad in that it is not limited to the Celanese facility at issue in this litigation. The request also seeks information regarding programs for Celanese employees as opposed to contractors like plaintiff and thus calls for information not relevant to this litigation.

Subject to and without waiving this or any other specific or general objection, Celanese denies this request as stated.

REQUEST FOR ADMISSION NO. 117

Admit that Celanese did not have any program to prevent employees from contracting asbestosis in 1966.

RESPONSE:

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Celanese objects to this request in that it is vague and ambiguous. Further, this request is overly broad in that it is not limited to the Celanese facility at issue in this litigation. The request also seeks information regarding programs for Celanese employees as opposed to contractors like plaintiff and thus calls for information not relevant to this litigation.

Subject to and without waiving this or any other specific or general objection, Celanese denies this request as stated.

REQUEST FOR ADMISSION NO. 118

Admit that Celanese did not have any program to prevent employees from contracting asbestosis in 1967.

RESPONSE:

Celanese objects to this request in that it is vague and ambiguous. Further, this request is overly broad in that it is not limited to the Celanese facility at issue in this litigation. The request also seeks information regarding programs for Celanese employees as opposed to contractors like plaintiff and thus calls for information not relevant to this litigation.

Subject to and without waiving this or any other specific or general objection, Celanese denies this request as stated.

REQUEST FOR ADMISSION NO. 119

Admit that Celanese did not have any program to prevent employees from contracting asbestosis in 1968.

RESPONSE:

Celanese objects to this request in that it is vague and ambiguous. Further, this request is overly broad in that it is not limited to the Celanese facility at issue in this litigation. The request also seeks information regarding programs for Celanese employees as opposed to contractors like plaintiff and thus calls for information not relevant to this litigation.

Subject to and without waiving this or any other specific or general objection, Celanese denies this request as stated.

REQUEST FOR ADMISSION NO. 120

Admit that Celanese did not have any program to prevent employees from contracting asbestosis in 1969.

RESPONSE:

Celanese objects to this request in that it is vague and ambiguous. Further, this request is overly broad in that it is not limited to the Celanese facility at issue in this litigation. The request also seeks information regarding programs for Celanese employees as opposed to contractors like plaintiff and thus calls for information not relevant to this litigation.

Subject to and without waiving this or any other specific or general objection, Celanese denies this request as stated.

REQUEST FOR ADMISSION NO. 121

Admit that Celanese did not have any program to prevent employees from contracting asbestosis in 1970.

RESPONSE:

Celanese objects to this request in that it is vague and ambiguous. Further, this request is overly broad in that it is not limited to the Celanese facility at issue in this litigation. The request also seeks information regarding programs for Celanese employees as opposed to contractors like plaintiff and thus calls for information not relevant to this litigation.

Subject to and without waiving this or any other specific or general objection, Celanese denies this request as stated.

REQUEST FOR ADMISSION NO. 122

Admit that Celanese did not have any program to prevent employees from contracting

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asbestosis in 1971.

RESPONSE:

Celanese objects to this request in that it is vague and ambiguous. Further, this request is overly broad in that it is not limited to the Celanese facility at issue in this litigation. The request also seeks information regarding programs for Celanese employees as opposed to contractors like plaintiff and thus calls for information not relevant to this litigation.

Subject to and without waiving this or any other specific or general objection, Celanese denies this request as stated.

REQUEST FOR ADMISSION NO. 123

Admit that Celanese did not have any program to prevent employees from contracting asbestosis in 1972.

RESPONSE:

Celanese objects to this request as overly broad in that it seeks information outside the time period at issue in this litigation. Further, the request is overly broad in that it is not limited to the Celanese facility at issue in this litigation.

REQUEST FOR ADMISSION NO. 124

Admit that Celanese did not have any program to prevent contractor employees from contracting asbestosis in 1959.

RESPONSE:

Celanese objects to this request as overly broad in that it seeks information outside the time period at issue in this litigation. Further, the request is overly broad in that it is not limited to the Celanese facility at issue in this litigation.

REQUEST FOR ADMISSION NO. 125

Admit that Celanese did not have any program to prevent contractor employees from contracting asbestosis in 1960.

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RESPONSE:

Celanese objects to this request as overly broad in that it seeks information outside the time period at issue in this litigation. Further, the request is overly broad in that it is not limited to the Celanese facility at issue in this litigation.

REQUEST FOR ADMISSION NO. 126

Admit that Celanese did not have any program to prevent contractor employees from contracting asbestosis in 1961.

RESPONSE:

Celanese objects to this request in that it is vague and ambiguous. Further, this request is overly broad in that it is not limited to the Celanese facility at issue in this litigation.

Subject to and without waiving this or any other specific or general objection, Celanese admits this request but denies that it had any duty to provide such program to independent contractor companies. However, Celanese further states in connection with this response that steps would have been taken in its plants that would have been useful in helping to prevent dust-related health problems. See also the responses to Requests for Admission Nos. 70-80, and Nos. 112-124, above.

REQUEST FOR ADMISSION NO. 127

Admit that Celanese did not have any program to prevent contractor employees from contracting asbestosis in 1962.

RESPONSE:

Celanese objects to this request in that it is vague and ambiguous. Further, this request is overly broad in that it is not limited to the Celanese facility at issue in this litigation.

Subject to and without waiving this or any other specific or general objection, Celanese admits this request but denies that it had any duty to provide such program to independent contractor companies. However, Celanese further states in connection with this response that steps would have been taken in its plants that would have been useful in helping to prevent dust-related health problems. See also the responses to Requests for Admission Nos. 70-80, and Nos. 112-124, above.

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REQUEST FOR ADMISSION NO. 128

Admit that Celanese did not have any program to prevent contractor employees from contracting asbestosis in 1963.

RESPONSE:

Celanese objects to this request in that it is vague and ambiguous. Further, this request is overly broad in that it is not limited to the Celanese facility at issue in this litigation.

Subject to and without waiving this or any other specific or general objection, Celanese admits this request but denies that it had any duty to provide such program to independent contractor companies. However, Celanese further states in connection with this response that steps would have been taken in its plants that would have been useful in helping to prevent dust-related health problems. See also the responses to Requests for Admission Nos. 70-80, and Nos. 112-124, above.

REQUEST FOR ADMISSION NO. 129

Admit that Celanese did not have any program to prevent contractor employees from contracting asbestosis in 1964.

RESPONSE:

Celanese objects to this request in that it is vague and ambiguous. Further, this request is overly broad in that it is not limited to the Celanese facility at issue in this litigation.

Subject to and without waiving this or any other specific or general objection, Celanese admits this request but denies that it had any duty to provide such program to independent contractor companies. However, Celanese further states in connection with this response that steps would have been taken in its plants that would have been useful in helping to prevent dust-related health problems. See also the responses to Requests for Admission Nos. 70-80, and Nos. 112-124, above.

REQUEST FOR ADMISSION NO. 130

Admit that Celanese did not have any program to prevent contractor employees from contracting asbestosis in 1965.

RESPONSE:

Celanese objects to this request in that it is vague and ambiguous. Further, this request is overly broad in that it is not limited to the Celanese facility at issue in this litigation.

Subject to and without waiving this or any other specific or general objection, Celanese admits this request but denies that it had any duty to provide such program to independent contractor companies. However, Celanese further states in connection with this response that steps would have been taken in its plants that would have been useful in helping to prevent dust-related health problems. See also the responses to Requests for Admission Nos. 70-80, and Nos. 112-124, above.

REQUEST FOR ADMISSION NO. 131

Admit that Celanese did not have any program to prevent contractor employees from contracting asbestosis in 1966.

RESPONSE:

Celanese objects to this request in that it is vague and ambiguous. Further, this request is overly broad in that it is not limited to the Celanese facility at issue in this litigation.

Subject to and without waiving this or any other specific or general objection, Celanese admits this request but denies that it had any duty to provide such program to independent contractor companies. However, Celanese further states in connection with this response that steps would have been taken in its plants that would have been useful in helping to prevent dust-related health problems. See also the responses to Requests for Admission Nos. 70-80, and Nos. 112-124, above.

REQUEST FOR ADMISSION NO. 132

Admit that Celanese did not have any program to prevent contractor employees from contracting asbestosis in 1967.

RESPONSE:

Celanese objects to this request in that it is vague and ambiguous. Further, this request is overly broad in that it is not limited to the Celanese facility at issue in this litigation.

Subject to and without waiving this or any other specific or general objection, Celanese

admits this request but denies that it had any duty to provide such program to independent contractor companies. However, Celanese further states in connection with this response that steps would have been taken in its plants that would have been useful in helping to prevent dust-related health problems. See also the responses to Requests for Admission Nos. 70-80, and Nos. 112-124, above.

REQUEST FOR ADMISSION NO. 133

Admit that Celanese did not have any program to prevent contractor employees from contracting asbestosis in 1968.

RESPONSE:

Celanese objects to this request in that it is vague and ambiguous. Further, this request is overly broad in that it is not limited to the Celanese facility at issue in this litigation.

Subject to and without waiving this or any other specific or general objection, Celanese admits this request but denies that it had any duty to provide such program to independent contractor companies. However, Celanese further states in connection with this response that steps would have been taken in its plants that would have been useful in helping to prevent dust-related health problems. See also the responses to Requests for Admission Nos. 70-80, and Nos. 112-124, above.

REQUEST FOR ADMISSION NO. 134

Admit that Celanese did not have any program to prevent contractor employees from contracting asbestosis in 1969.

RESPONSE:

Celanese objects to this request in that it is vague and ambiguous. Further, this request is overly broad in that it is not limited to the Celanese facility at issue in this litigation.

Subject to and without waiving this or any other specific or general objection, Celanese admits this request but denies that it had any duty to provide such program to independent contractor companies. However, Celanese further states in connection with this response that steps would have been taken in its plants that would have been useful in helping to prevent dust-related health problems. See also the responses to

Requests for Admission Nos. 70-80, and Nos. 112-124, above.

REQUEST FOR ADMISSION NO. 135

Admit that Celanese did not have any program to prevent contractor employees from contracting asbestosis in 1970.

RESPONSE:

Celanese objects to this request in that it is vague and ambiguous. Further, this request is overly broad in that it is not limited to the Celanese facility at issue in this litigation.

Subject to and without waiving this or any other specific or general objection, Celanese admits this request but denies that it had any duty to provide such program to independent contractor companies. However, Celanese further states in connection with this response that steps would have been taken in its plants that would have been useful in helping to prevent dust-related health problems. See also the responses to Requests for Admission Nos. 70-80, and Nos. 112-124, above.

REQUEST FOR ADMISSION NO. 136

Admit that Celanese did not have any program to prevent contractor employees from contracting asbestosis in 1971.

RESPONSE:

Celanese objects to this request in that it is vague and ambiguous. Further, this request is overly broad in that it is not limited to the Celanese facility at issue in this litigation.

Subject to and without waiving this or any other specific or general objection, Celanese admits this request but denies that it had any duty to provide such program to independent contractor companies. However, Celanese further states in connection with this response that steps would have been taken in its plants that would have been useful in helping to prevent dust-related health problems. See also the responses to Requests for Admission Nos. 70-80, and Nos. 112-124, above.

REQUEST FOR ADMISSION NO. 137

Celanese Ltd.'s Responses to Plaintiff
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Admit that Celanese did not have any program to prevent contractor employees from contracting asbestosis in 1972.

RESPONSE:

Celanese objects to this request as overly broad in that it seeks information outside the time period at issue in this litigation. Further, the request is overly broad in that it is not limited to the Celanese facility at issue in this litigation.

REQUEST FOR ADMISSION NO. 139

Admit that Celanese employee Dr. Ernest Dixon attended the 1964 New York Academy of Sciences meeting.

RESPONSE:

Admitted

REQUEST FOR ADMISSION NO. 140

Admit that Celanese employee Dr. Ernest Dixon attended the presentation of Dr. Selikoff on his findings regarding asbestos-related cancer at the 1964 New York Academy of Sciences meeting.

RESPONSE:

Celanese admits only that Dr. Dixon, who was not its employee at the time, attended some number of the presentations made at the 1964 New York Academy of Sciences meeting.

REQUEST FOR ADMISSION NO. 141

Admit that Celanese safety personnel held contractors to the same safety standards to which Celanese employees were held.

RESPONSE:

Celanese objects to this request as vague and ambiguous. Further, this request is not

properly limited to the time period or the specific Celanese facility at issue in this litigation.

Subject to and without waiving this or any other specific or general objection, Celanese admits only that independent contractor companies on its premises, as a matter of contract, were obligated to follow all state and federal laws and also to comply with all plant policies and safety rules. At all times, however, ultimate responsibility rested with the independent contractor companies to provide a safe workplace for their own employees.

REQUEST FOR ADMISSION NO. 142

Admit that Celanese safety personnel determined which safety equipment contractor employees would be required to utilize.

RESPONSE:

Celanese objects to this request as vague and ambiguous. Further, this request is not properly limited to the time period or the specific Celanese facility at issue in this litigation. Further, this request is duplicative of Interrogatory No. 11 of plaintiff's First set of Interrogatories to Celanese.

Subject to and without waiving this or any other specific or general objection, denied as stated.

REQUEST FOR ADMISSION NO. 143

Admit that Celanese employees made contractor employees abide by Celanese safety rules.

RESPONSE:

Celanese objects to this request as vague and ambiguous. Further, this request is not properly limited to the time period or the specific Celanese facility at issue in this litigation.

Subject to and without waiving this or any other specific or general objection, denied as stated. Celanese further states in connection with this response, that if it observed

independent contractor employees in violation of established safety rules, the matter ordinarily would be reported to the independent contractor's supervisors for them to take appropriate corrective action.

REQUEST FOR ADMISSION NO. 144

Admit that Celanese safety personnel had the power to enforce Celanese safety rules against contractors in the Bishop plant.

RESPONSE:

Celanese objects to this request as vague and ambiguous. Further, this request is not properly limited to the time period at issue in this litigation.

Subject to and without waiving this or any other specific or general objection, admitted with regard to independent contractors at the plant. See also, response to Request for Admission No. 143, above.

REQUEST FOR ADMISSION NO. 145

Admit that Celanese had the power to expel contractors who did not comply with Celanese's safety rules.

RESPONSE:

Celanese objects to this request as vague and ambiguous. Further, this request is not properly limited to the time period and/or plant at issue in this litigation.

Subject to and without waiving this or any other specific or general objection, admitted.

REQUEST FOR ADMISSION NO. 146

Admit that Celanese had the power to shut down the contractors who did not comply with Celanese' safety rules.

RESPONSE:

Celanese objects to this request as vague and ambiguous. Further, this request is not properly limited to the time period and/or plant at issue in this litigation.

Subject to and without waiving this or any other specific or general objection, admitted.

REQUEST FOR ADMISSION NO. 147

Admit that Celanese placed air monitoring equipment on Arthur Brothers, Inc.(ABI) contractor employees at the Bishop facility.

RESPONSE:

Celanese objects to this request as vague and ambiguous. Further, this request is not properly limited to the time period at issue in this litigation.

Subject to and without waiving this or any other specific or general objection, Celanese admits that it from time to time conducted air monitoring of Arthur Brothers employees at the Bishop plant. Celanese further states in connection with this response that it also helped train Arthur Brothers to do its own air monitoring of Arthur Brothers employees.

REQUEST FOR ADMISSION NO. 148

Admit that Celanese did not notify ABI employees of any results of the air monitoring at the Bishop facility.

RESPONSE:

Celanese objects to this request as vague and ambiguous. Further, this request is not properly limited to the time period at issue in this litigation.

Subject to and without waiving this or any other specific or general objection, denied.

REQUEST FOR ADMISSION NO. 149

Admit that Celanese placed air monitoring equipment at the contractor work insulation fabrication shop at the Bishop facility.

RESPONSE:

Celanese objects to this request as vague and ambiguous. Further, this request is outside the relevant time period in this litigation.

REQUEST FOR ADMISSION NO. 150

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Admit that in 1972 a contractor insulation fab shop air monitoring included dust counts that overloaded the sample filters, despite the addition of vacuum equipment.

RESPONSE:

Celanese objects to this request as overly broad in that it seeks information outside of the time period at issue in this litigation and further in that it is not limited to the specific Celanese facility at issue in this litigation. The request therefore calls for information not relevant to this litigation.

REQUEST FOR ADMISSION NO. 151

Admit that Celanese place air monitors on ABI employees who were removing asbestos-containing insulation from pipes.

RESPONSE:

Celanese objects to this request as vague, ambiguous and overly broad. Further, the request is outside the relevant time period in this litigation and is not limited to the specific Celanese facility at issue in this litigation.

Subject to and without waiving this or any other specific or general objection, Celanese admits that from time to time it conducted air monitoring of Arthur Brothers employees removing asbestos-containing insulation from pipes. Celanese further states in connection with this response that it also helped train Arthur Brothers to do its own air monitoring of Arthur Brothers employees.

REQUEST FOR ADMISSION NO. 152

Admit that Celanese provided goods and services to the United States government that totaled over \$10,000 in value in 1950.

RESPONSE:

Celanese objects to this request as overly broad in that it seeks information outside of the time period at issue in this litigation and further in that it is not limited to the specific Celanese facility at issue in this litigation. The request therefore calls for information not

relevant to this litigation.

REQUEST FOR ADMISSION NO. 153

Admit that Celanese provided goods and services to the United States government that totaled over \$10,000 in value in 1951.

RESPONSE:

Celanese objects to this request as overly broad in that it seeks information outside of the time period at issue in this litigation and further in that it is not limited to the specific Celanese facility at issue in this litigation. The request therefore calls for information not relevant to this litigation.

REQUEST FOR ADMISSION NO. 154

Admit that Celanese provided goods and services to the United States government that totaled over \$10,000 in value in 1952.

RESPONSE:

Celanese objects to this request as overly broad in that it seeks information outside of the time period at issue in this litigation and further in that it is not limited to the specific Celanese facility at issue in this litigation. The request therefore calls for information not relevant to this litigation.

REQUEST FOR ADMISSION NO. 155

Admit that Celanese provided goods and services to the United States government that totaled over \$10,000 in value in 1953.

RESPONSE:

Celanese objects to this request as overly broad in that it seeks information outside of the time period at issue in this litigation and further in that it is not limited to the specific Celanese facility at issue in this litigation. The request therefore calls for information not relevant to this litigation.

REQUEST FOR ADMISSION NO. 156

Admit that Celanese provided goods and services to the United States government that totaled over \$10,000 in value in 1954.

RESPONSE:

Celanese objects to this request as overly broad in that it seeks information outside of the time period at issue in this litigation and further in that it is not limited to the specific Celanese facility at issue in this litigation. The request therefore calls for information not relevant to this litigation.

REQUEST FOR ADMISSION NO. 157

Admit that Celanese provided goods and services to the United States government that totaled over \$10,000 in value in 1955.

RESPONSE:

Celanese objects to this request as overly broad in that it seeks information outside of the time period at issue in this litigation and further in that it is not limited to the specific Celanese facility at issue in this litigation. The request therefore calls for information not relevant to this litigation.

REQUEST FOR ADMISSION NO. 158

Admit that Celanese provided goods and services to the United States government that totaled over \$10,000 in value in 1956.

RESPONSE:

Celanese objects to this request as overly broad in that it seeks information outside of the time period at issue in this litigation and further in that it is not limited to the specific Celanese facility at issue in this litigation. The request therefore calls for information not relevant to this litigation.

REQUEST FOR ADMISSION NO. 159

Admit that Celanese provided goods and services to the United States government that totaled over \$10,000 in value in 1957.

RESPONSE:

Celanese objects to this request as overly broad in that it seeks information outside of the time period at issue in this litigation and further in that it is not limited to the specific Celanese facility at issue in this litigation. The request therefore calls for information not relevant to this litigation.

REQUEST FOR ADMISSION NO. 160

Admit that Celanese provided goods and services to the United States government that totaled over \$10,000 in value in 1958.

RESPONSE:

Celanese objects to this request as overly broad in that it seeks information outside of the time period at issue in this litigation and further in that it is not limited to the specific Celanese facility at issue in this litigation. The request therefore calls for information not relevant to this litigation.

REQUEST FOR ADMISSION NO. 161

Admit that Celanese provided goods and services to the United States government that totaled over \$10,000 in value in 1959.

RESPONSE:

Celanese objects to this request as overly broad in that it seeks information outside of the time period at issue in this litigation and further in that it is not limited to the specific Celanese facility at issue in this litigation. The request therefore calls for information not relevant to this litigation.

REQUEST FOR ADMISSION NO. 162

Admit that Celanese provided goods and services to the United States government that totaled over \$10,000 in value in 1960.

RESPONSE:

Celanese objects to this request as overly broad in that it seeks information outside of the time period at issue in this litigation and further in that it is not limited to the specific Celanese facility at issue in this litigation. The request therefore calls for information not relevant to this litigation.

REQUEST FOR ADMISSION NO. 163

Admit that Celanese provided goods and services to the United States government that totaled over \$10,000 in value in 1961.

RESPONSE:

Celanese objects to this request in that it seeks information not relevant to this litigation and not reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving this or any other specific or general objection, Celanese, on present information, can neither admit nor deny this request.

REQUEST FOR ADMISSION NO. 164

Admit that Celanese provided goods and services to the United States government that totaled over \$10,000 in value in 1962.

RESPONSE:

Celanese objects to this request in that it seeks information not relevant to this litigation and not reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving this or any other specific or general objection, Celanese, on present information, can neither admit nor deny this request.

REQUEST FOR ADMISSION NO. 165

Admit that Celanese provided goods and services to the United States government that totaled over \$10,000 in value in 1963.

RESPONSE:

Celanese objects to this request in that it seeks information not relevant to this litigation and not reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving this or any other specific or general objection, Celanese, on present information, can neither admit nor deny this request.

REQUEST FOR ADMISSION NO. 166

Admit that Celanese provided goods and services to the United States government that totaled over \$10,000 in value in 1964.

RESPONSE:

Celanese objects to this request in that it seeks information not relevant to this litigation and not reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving this or any other specific or general objection, Celanese, on present information, can neither admit nor deny this request.

REQUEST FOR ADMISSION NO. 167

Admit that Celanese provided goods and services to the United States government that totaled over \$10,000 in value in 1965.

RESPONSE:

Celanese objects to this request in that it seeks information not relevant to this litigation and not reasonably calculated to lead to the discovery of admissible evidence.

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Subject to and without waiving this or any other specific or general objection, Celanese, on present information, can neither admit nor deny this request.

REQUEST FOR ADMISSION NO. 168

Admit that Celanese provided goods and services to the United States government that totaled over \$10,000 in value in 1966.

RESPONSE:

Celanese objects to this request in that it seeks information not relevant to this litigation and not reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving this or any other specific or general objection, Celanese, on present information, can neither admit nor deny this request.

REQUEST FOR ADMISSION NO. 169

Admit that Celanese provided goods and services to the United States government that totaled over \$10,000 in value in 1967.

RESPONSE:

Celanese objects to this request in that it seeks information not relevant to this litigation and not reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving this or any other specific or general objection, Celanese, on present information, can neither admit nor deny this request.

REQUEST FOR ADMISSION NO. 170

Admit that Celanese provided goods and services to the United States government that totaled over \$10,000 in value in 1968.

RESPONSE:

Celanese Ltd.'s Responses to Plaintiff
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Celanese objects to this request in that it seeks information not relevant to this litigation and not reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving this or any other specific or general objection, Celanese, on present information, can neither admit nor deny this request.

REQUEST FOR ADMISSION NO. 171

Admit that Celanese provided goods and services to the United States government that totaled over \$10,000 in value in 1969.

RESPONSE:

Celanese objects to this request in that it seeks information not relevant to this litigation and not reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving this or any other specific or general objection, Celanese, on present information, can neither admit nor deny this request.

REQUEST FOR ADMISSION NO. 172

Admit that Celanese provided goods and services to the United States government that totaled over \$10,000 in value in 1970.

RESPONSE:

Celanese objects to this request in that it seeks information not relevant to this litigation and not reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving this or any other specific or general objection, Celanese, on present information, can neither admit nor deny this request.

REQUEST FOR ADMISSION NO. 173

Admit that Celanese owned and operated the facility in Bishop, Texas from 1959-1972.

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RESPONSE:

Admitted

REQUEST FOR ADMISSION NO. 174

Admit that Plaintiff was employed by Arthur Brothers, Inc. (ABI) in 1959.

RESPONSE:

Celanese objects to this request in that it seeks information that is within the knowledge of plaintiff, not Celanese, and of which Celanese has no independent verification. Further, this request is not limited to the time period at issue in this litigation.

Subject to and without waiving this or any other specific or general objection, Celanese denies this request based upon plaintiff's testimony.

REQUEST FOR ADMISSION NO. 175

Admit that Plaintiff was employed by Arthur Brothers, Inc. (ABI) in 1960.

RESPONSE:

Celanese objects to this request in that it seeks information that is within the knowledge of plaintiff, not Celanese, and of which Celanese has no independent verification. Further, this request is not limited to the time period at issue in this litigation.

Subject to and without waiving this or any other specific or general objection, Celanese denies this request based upon plaintiff's testimony.

REQUEST FOR ADMISSION NO. 176

Admit that Plaintiff was employed by Arthur Brothers, Inc. (ABI) in 1961.

RESPONSE:

Celanese objects to this request in that it seeks information that is within the knowledge of plaintiff, not Celanese, and of which Celanese has no independent verification.

Subject to and without waiving this or any other specific or general objection, Celanese

admits that plaintiff testified at his deposition that he was employed by Arthur Brothers during the stated time period.

REQUEST FOR ADMISSION NO. 177

Admit that Plaintiff was employed by Arthur Brothers, Inc. (ABI) in 1962.

RESPONSE:

Celanese objects to this request in that it seeks information that is within the knowledge of plaintiff, not Celanese, and of which Celanese has no independent verification.

Subject to and without waiving this or any other specific or general objection, Celanese admits that plaintiff testified at his deposition that he was employed by Arthur Brothers during the stated time period.

REQUEST FOR ADMISSION NO. 178

Admit that Plaintiff was employed by Arthur Brothers, Inc. (ABI) in 1963.

RESPONSE:

Celanese objects to this request in that it seeks information that is within the knowledge of plaintiff, not Celanese, and of which Celanese has no independent verification.

Subject to and without waiving this or any other specific or general objection, Celanese admits that plaintiff testified at his deposition that he was employed by Arthur Brothers during the stated time period.

REQUEST FOR ADMISSION NO. 179

Admit that Plaintiff was employed by Arthur Brothers, Inc. (ABI) in 1964.

RESPONSE:

Celanese objects to this request in that it seeks information that is within the knowledge of plaintiff, not Celanese, and of which Celanese has no independent verification.

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Subject to and without waiving this or any other specific or general objection, Celanese admits that plaintiff testified at his deposition that he was employed by Arthur Brothers during the stated time period.

REQUEST FOR ADMISSION NO. 180

Admit that Plaintiff was employed by Arthur Brothers, Inc. (ABI) in 1965.

RESPONSE:

Celanese objects to this request in that it seeks information that is within the knowledge of plaintiff, not Celanese, and of which Celanese has no independent verification.

Subject to and without waiving this or any other specific or general objection, Celanese admits that plaintiff testified at his deposition that he was employed by Arthur Brothers during the stated time period.

REQUEST FOR ADMISSION NO. 181

Admit that Plaintiff was employed by Arthur Brothers, Inc. (ABI) in 1966.

RESPONSE:

Celanese objects to this request in that it seeks information that is within the knowledge of plaintiff, not Celanese, and of which Celanese has no independent verification.

Subject to and without waiving this or any other specific or general objection, Celanese admits that plaintiff testified at his deposition that he was employed by Arthur Brothers during the stated time period.

REQUEST FOR ADMISSION NO. 182

Admit that Plaintiff was employed by Arthur Brothers, Inc. (ABI) in 1967.

RESPONSE:

Celanese objects to this request in that it seeks information that is within the knowledge

of plaintiff, not Celanese, and of which Celanese has no independent verification.

Subject to and without waiving this or any other specific or general objection, Celanese admits that plaintiff testified at his deposition that he was employed by Arthur Brothers during the stated time period.

REQUEST FOR ADMISSION NO. 183

Admit that Plaintiff was employed by Arthur Brothers, Inc. (ABI) in 1968.

RESPONSE:

Celanese objects to this request in that it seeks information that is within the knowledge of plaintiff, not Celanese, and of which Celanese has no independent verification.

Subject to and without waiving this or any other specific or general objection, Celanese admits that plaintiff testified at his deposition that he was employed by Arthur Brothers during the stated time period.

REQUEST FOR ADMISSION NO. 184

Admit that Plaintiff was employed by Arthur Brothers, Inc. (ABI) in 1969.

RESPONSE:

Celanese objects to this request in that it seeks information that is within the knowledge of plaintiff, not Celanese, and of which Celanese has no independent verification.

Subject to and without waiving this or any other specific or general objection, Celanese admits that plaintiff testified at his deposition that he was employed by Arthur Brothers during the stated time period.

REQUEST FOR ADMISSION NO. 185

Admit that Plaintiff was employed by Arthur Brothers, Inc. (ABI) in 1970.

RESPONSE:

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Celanese objects to this request in that it seeks information that is within the knowledge of plaintiff, not Celanese, and of which Celanese has no independent verification.

Subject to and without waiving this or any other specific or general objection, Celanese cannot either admit or deny this request based on the ambiguity and conflict in plaintiff's deposition testimony.

REQUEST FOR ADMISSION NO. 186

Admit that Plaintiff was employed by Arthur Brothers, Inc. (ABI) in 1971.

RESPONSE:

Celanese objects to this request in that it seeks information that is within the knowledge of plaintiff, not Celanese, and of which Celanese has no independent verification.

Subject to and without waiving this or any other specific or general objection, Subject to and without waiving this or any other specific or general objection, Celanese cannot either admit or deny this request based on the ambiguity and conflict in plaintiff's deposition testimony.

REQUEST FOR ADMISSION NO. 187

Admit that Plaintiff was employed by Arthur Brothers, Inc. (ABI) in 1972.

RESPONSE:

Celanese objects to this request in that it seeks information that is within the knowledge of plaintiff, not Celanese, and of which Celanese has no independent verification. Further, this request is outside the time period at issue in this litigation.

Subject to and without waiving this or any other specific or general objection, Celanese denies this request based upon plaintiff's testimony.

REQUEST FOR ADMISSION NO. 188

Celanese Ltd.'s Responses to Plaintiff
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Admit that Celanese contracted with ABI to provide services at its Bishop, Texas facility in 1959.

RESPONSE:

Celanese objects to this request as overly broad in that it seeks information outside the time period at issue in this litigation. Celanese further objects to this request because it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

REQUEST FOR ADMISSION NO. 189

Admit that Celanese contracted with ABI to provide services at its Bishop, Texas facility in 1960.

RESPONSE:

Celanese objects to this request as overly broad in that it seeks information outside the time period at issue in this litigation. Celanese further objects to this request because it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

REQUEST FOR ADMISSION NO. 190

Admit that Celanese contracted with ABI to provide services at its Bishop, Texas facility in 1961.

RESPONSE:

Celanese objects to this request as vague and ambiguous. Subject to and without waiving this or any other specific or general objection, Celanese admits that it contracted with Arthur Brothers to provide independent contractor services at the Bishop plant during the stated period.

REQUEST FOR ADMISSION NO. 191

Admit that Celanese contracted with ABI to provide services at its Bishop, Texas facility in 1962.

RESPONSE:

Celanese objects to this request as vague and ambiguous. Subject to and without waiving this or any other specific or general objection, Celanese admits that it contracted with Arthur Brothers to provide independent contractor services at the Bishop plant during the stated period.

REQUEST FOR ADMISSION NO. 192

Admit that Celanese contracted with ABI to provide services at its Bishop, Texas facility in 1963.

RESPONSE:

Celanese objects to this request as vague and ambiguous. Subject to and without waiving this or any other specific or general objection, Celanese admits that it contracted with Arthur Brothers to provide independent contractor services at the Bishop plant during the stated period.

REQUEST FOR ADMISSION NO. 193

Admit that Celanese contracted with ABI to provide services at its Bishop, Texas facility in 1964.

RESPONSE:

Celanese objects to this request as vague and ambiguous. Subject to and without waiving this or any other specific or general objection, Celanese admits that it contracted with Arthur Brothers to provide independent contractor services at the Bishop plant during the stated period.

REQUEST FOR ADMISSION NO. 194

Admit that Celanese contracted with ABI to provide services at its Bishop, Texas facility in 1965.

RESPONSE:

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Celanese objects to this request as vague and ambiguous. Subject to and without waiving this or any other specific or general objection, Celanese admits that it contracted with Arthur Brothers to provide independent contractor services at the Bishop plant during the stated period.

REQUEST FOR ADMISSION NO. 195

Admit that Celanese contracted with ABI to provide services at its Bishop, Texas facility in 1966.

RESPONSE:

Celanese objects to this request as vague and ambiguous. Subject to and without waiving this or any other specific or general objection, Celanese admits that it contracted with Arthur Brothers to provide independent contractor services at the Bishop plant during the stated period.

REQUEST FOR ADMISSION NO. 196

Admit that Celanese contracted with ABI to provide services at its Bishop, Texas facility in 1967.

RESPONSE:

Celanese objects to this request as vague and ambiguous. Subject to and without waiving this or any other specific or general objection, Celanese admits that it contracted with Arthur Brothers to provide independent contractor services at the Bishop plant during the stated period.

REQUEST FOR ADMISSION NO. 197

Admit that Celanese contracted with ABI to provide services at its Bishop, Texas facility in 1968.

RESPONSE:

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Celanese objects to this request as vague and ambiguous. Subject to and without waiving this or any other specific or general objection, Celanese admits that it contracted with Arthur Brothers to provide independent contractor services at the Bishop plant during the stated period.

REQUEST FOR ADMISSION NO. 198

Admit that Celanese contracted with ABI to provide services at its Bishop, Texas facility in 1969.

RESPONSE:

Celanese objects to this request as vague and ambiguous. Subject to and without waiving this or any other specific or general objection, Celanese admits that it contracted with Arthur Brothers to provide independent contractor services at the Bishop plant during the stated period.

REQUEST FOR ADMISSION NO. 199

Admit that Celanese contracted with ABI to provide services at its Bishop, Texas facility in 1970.

RESPONSE:

Celanese objects to this request as vague and ambiguous. Subject to and without waiving this or any other specific or general objection, Celanese admits that it contracted with Arthur Brothers to provide independent contractor services at the Bishop plant during the stated period.

REQUEST FOR ADMISSION NO. 200

Admit that Celanese contracted with ABI to provide services at its Bishop, Texas facility in 1971.

RESPONSE:

Celanese objects to this request as vague and ambiguous. Subject to and without

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waiving this or any other specific or general objection, Celanese admits that it contracted with Arthur Brothers to provide independent contractor services at the Bishop plant during the stated period.

REQUEST FOR ADMISSION NO. 201

Admit that Celanese contracted with ABI to provide services at its Bishop, Texas facility in 1972.

RESPONSE:

Celanese objects to this request as vague and ambiguous in that the term "services" is undefined. Celanese further objects to this request as overly broad and harassing in that it is outside the time period at issue in this litigation and it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

REQUEST FOR ADMISSION NO. 202

Admit that Plaintiff worked as an employee of ABI at the Celanese Bishop, Texas facility in 1959.

RESPONSE:

Celanese objects to this request as vague and ambiguous in that the term "services" is undefined. Celanese further objects to this request as overly broad and harassing in that it is outside the time period at issue in this litigation and it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

REQUEST FOR ADMISSION NO. 203

Admit that Plaintiff worked as an employee of ABI at the Celanese Bishop, Texas facility in 1960.

RESPONSE:

Celanese objects to this request as vague and ambiguous in that the term "services" is undefined. Celanese further objects to this request as overly broad and harassing in

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that it is outside the time period at issue in this litigation and it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

REQUEST FOR ADMISSION NO. 204

Admit that Plaintiff worked as an employee of ABI at the Celanese Bishop, Texas facility in 1961.

RESPONSE:

See responses to Requests for Admission Nos. 176 - 184.

REQUEST FOR ADMISSION NO. 205

Admit that Plaintiff worked as an employee of ABI at the Celanese Bishop, Texas facility in 1962.

RESPONSE:

See responses to Requests for Admission Nos. 176 - 184.

REQUEST FOR ADMISSION NO. 206

Admit that Plaintiff worked as an employee of ABI at the Celanese Bishop, Texas facility in 1963.

RESPONSE:

See responses to Requests for Admission Nos. 176 - 184.

REQUEST FOR ADMISSION NO. 207

Admit that Plaintiff worked as an employee of ABI at the Celanese Bishop, Texas facility in 1964.

RESPONSE:

See responses to Requests for Admission Nos. 176 - 184.

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REQUEST FOR ADMISSION NO. 208

Admit that Plaintiff worked as an employee of ABI at the Celanese Bishop, Texas facility in 1965.

RESPONSE:

See responses to Requests for Admission Nos. 176 - 184.

REQUEST FOR ADMISSION NO. 209

Admit that Plaintiff worked as an employee of ABI at the Celanese Bishop, Texas facility in 1966.

RESPONSE:

See responses to Requests for Admission Nos. 176 - 184.

REQUEST FOR ADMISSION NO. 210

Admit that Plaintiff worked as an employee of ABI at the Celanese Bishop, Texas facility in 1967.

RESPONSE:

See responses to Requests for Admission Nos. 176 - 184.

REQUEST FOR ADMISSION NO. 211

Admit that Plaintiff worked as an employee of ABI at the Celanese Bishop, Texas facility in 1968.

RESPONSE:

See responses to Requests for Admission Nos. 176 - 184.

REQUEST FOR ADMISSION NO. 212

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Admit that Plaintiff worked as an employee of ABI at the Celanese Bishop, Texas facility in 1969.

RESPONSE:

See responses to Requests for Admission Nos. 176 - 184.

REQUEST FOR ADMISSION NO. 213

Admit that Plaintiff worked as an employee of ABI at the Celanese Bishop, Texas facility in 1970.

RESPONSE:

See responses to Requests for Admission Nos. 185 - 186.

REQUEST FOR ADMISSION NO. 214

Admit that Plaintiff worked as an employee of ABI at the Celanese Bishop, Texas facility in 1971.

RESPONSE:

See responses to Requests for Admission Nos. 185 - 186.

REQUEST FOR ADMISSION NO. 215

Admit that Plaintiff worked as an employee of ABI at the Celanese Bishop, Texas facility in 1972.

RESPONSE:

Celanese objects to this request as overly broad in that it seeks information outside the time period at issue in this litigation. Celanese further objects to this request because it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

REQUEST FOR ADMISSION NO. 216

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Admit that Celanese manufactured Celenex at the Bishop facility in 1959.

RESPONSE:

Celanese objects to this request as overly broad in that it seeks information outside the time period at issue in this litigation.

Subject to and without waiving the foregoing objections, denied

REQUEST FOR ADMISSION NO. 217

Admit that Celanese manufactured Celenex at the Bishop facility in 1960.

RESPONSE:

Celanese objects to this request as overly broad in that it seeks information outside the time period at issue in this litigation.

Subject to and without waiving the foregoing objection, denied.

REQUEST FOR ADMISSION NO. 218

Admit that Celanese manufactured Celenex at the Bishop facility in 1961.

RESPONSE:

Denied.

REQUEST FOR ADMISSION NO. 219

Admit that Celanese manufactured Celenex at the Bishop facility in 1962.

RESPONSE:

Denied.

REQUEST FOR ADMISSION NO. 220

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Admit that Celanese manufactured Celenex at the Bishop facility in 1963.

RESPONSE:

Denied.

REQUEST FOR ADMISSION NO. 221

Admit that Celanese manufactured Celenex at the Bishop facility in 1964.

RESPONSE:

Denied.

REQUEST FOR ADMISSION NO. 222

Admit that Celanese manufactured Celenex at the Bishop facility in 1965.

RESPONSE:

Denied.

REQUEST FOR ADMISSION NO. 223

Admit that Celanese manufactured Celenex at the Bishop facility in 1966.

RESPONSE:

Denied.

REQUEST FOR ADMISSION NO. 224

Admit that Celanese manufactured Celenex at the Bishop facility in 1967.

RESPONSE:

Denied.

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REQUEST FOR ADMISSION NO. 225

Admit that Celanese manufactured Celenex at the Bishop facility in 1968.

RESPONSE:

Denied.

REQUEST FOR ADMISSION NO. 226

Admit that Celanese manufactured Celenex at the Bishop facility in 1969.

RESPONSE:

Denied.

REQUEST FOR ADMISSION NO. 227

Admit that Celanese manufactured Celenex at the Bishop facility in 1970.

RESPONSE:

Denied.

REQUEST FOR ADMISSION NO. 228

Admit that Celanese manufactured Celenex at the Bishop facility in 1971.

RESPONSE:

Admitted.

REQUEST FOR ADMISSION NO. 229

Admit that Celanese manufactured Celenex at the Bishop facility in 1972.

RESPONSE:

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Celanese objects to this request as overly broad in that it seeks information outside the time period at issue in this litigation.

Subject to and without waiving the foregoing objections, admitted.

REQUEST FOR ADMISSION NO. 230

Admit that raw asbestos fibers were used in the manufacturing of Celenex at the Bishop facility in 1959.

RESPONSE:

Celanese objects to this request in that it is outside the time period relevant to this litigation.

Subject to and without waiving this or any other specific or general objection, denied.

REQUEST FOR ADMISSION NO. 231

Admit that raw asbestos fibers were used in the manufacturing of Celenex at the Bishop facility in 1960.

RESPONSE:

Celanese objects to this request in that it is outside the time period relevant to this litigation.

Subject to and without waiving this or any other specific or general objection, Denied.

REQUEST FOR ADMISSION NO. 232

Admit that raw asbestos fibers were used in the manufacturing of Celenex at the Bishop facility in 1961.

RESPONSE:

Celanese objects to this request as duplicative of previous request served upon and answered by Celanese.

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Subject to and without waiving this or any other specific or general objection, Denied.

REQUEST FOR ADMISSION NO. 233

Admit that raw asbestos fibers were used in the manufacturing of Celenex at the Bishop facility in 1962.

RESPONSE:

Celanese objects to this request as duplicative of previous request served upon and answered by Celanese.

Subject to and without waiving this or any other specific or general objection, Denied.

REQUEST FOR ADMISSION NO. 234

Admit that raw asbestos fibers were used in the manufacturing of Celenex at the Bishop facility in 1963.

RESPONSE:

Celanese objects to this request as duplicative of previous request served upon and answered by Celanese.

Subject to and without waiving this or any other specific or general objection, Denied.

REQUEST FOR ADMISSION NO. 235

Admit that raw asbestos fibers were used in the manufacturing of Celenex at the Bishop facility in 1964.

RESPONSE:

Celanese objects to this request as duplicative of previous requests served upon and answered by Celanese.

Subject to and without waiving this or any other specific or general objection, Denied.

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REQUEST FOR ADMISSION NO. 236

Admit that raw asbestos fibers were used in the manufacturing of Celenex at the Bishop facility in 1965.

RESPONSE:

Celanese objects to this request as duplicative of previous requests served upon and answered by Celanese.

Subject to and without waiving this or any other specific or general objection, Denied.

REQUEST FOR ADMISSION NO. 237

Admit that raw asbestos fibers were used in the manufacturing of Celenex at the Bishop facility in 1966.

RESPONSE:

Celanese objects to this request as duplicative of previous requests served upon and answered by Celanese.

Subject to and without waiving this or any other specific or general objection, Denied.

REQUEST FOR ADMISSION NO. 238

Admit that raw asbestos fibers were used in the manufacturing of Celenex at the Bishop facility in 1967.

RESPONSE:

Celanese objects to this request as duplicative of previous requests served upon and answered by Celanese.

Subject to and without waiving this or any other specific or general objection, Denied.

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REQUEST FOR ADMISSION NO. 239

Admit that raw asbestos fibers were used in the manufacturing of Celenex at the Bishop facility in 1968.

RESPONSE:

Celanese objects to this request as duplicative of previous requests served upon and answered by Celanese.

Subject to and without waiving this or any other specific or general objection, Denied.

REQUEST FOR ADMISSION NO. 240

Admit that raw asbestos fibers were used in the manufacturing of Celenex at the Bishop facility in 1969.

RESPONSE:

Celanese objects to this request as duplicative of previous requests served upon and answered by Celanese.

Subject to and without waiving this or any other specific or general objection, Denied.

REQUEST FOR ADMISSION NO. 241

Admit that raw asbestos fibers were used in the manufacturing of Celenex at the Bishop facility in 1970.

RESPONSE:

Celanese objects to this request as duplicative of previous requests served upon and answered by Celanese.

Subject to and without waiving this or any other specific or general objection, denied.

REQUEST FOR ADMISSION NO. 242

Admit that raw asbestos fibers were used in the manufacturing of Celenex at the Bishop facility in 1971.

RESPONSE:

Celanese objects to this request as duplicative of previous requests served upon and answered by Celanese.

Subject to and without waiving this or any other specific or general objection, Admitted.

REQUEST FOR ADMISSION NO. 243

Admit that raw asbestos fibers were used in the manufacturing of Celenex at the Bishop facility in 1972.

RESPONSE:

Celanese objects to this request as it is outside the time period relevant to this litigation. Further, the request is duplicative of previous requests served upon and answered by Celanese.

REQUEST FOR ADMISSION NO. 244

Admit that the raw asbestos fiber used in the manufacture of Celenex was "Calidria" brand.

RESPONSE:

Celanese objects to this request in that it is not limited to the time period and/or plant at issue in this litigation.

Subject to and without waiving this or any other specific or general objection, admitted upon present information and belief.

REQUEST FOR ADMISSION NO. 245

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Admit that asbestos containing pipe insulation was in use at the Bishop facility in 1959.

RESPONSE:

Celanese objects to this request as overly broad in that it seeks information outside the time period at issue in this litigation. Celanese further objects to this request because it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

REQUEST FOR ADMISSION NO. 246

Admit that asbestos containing pipe insulation was in use at the Bishop facility in 1960.

RESPONSE:

Celanese objects to this request as overly broad in that it seeks information outside the time period at issue in this litigation. Celanese further objects to this request because it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

REQUEST FOR ADMISSION NO. 247

Admit that asbestos containing pipe insulation was in use at the Bishop facility in 1961.

RESPONSE:

Celanese admits that at various times asbestos-containing pipe covering was utilized at the Bishop Plant.

REQUEST FOR ADMISSION NO. 248

Admit that asbestos containing pipe insulation was in use at the Bishop facility in 1962.

RESPONSE:

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Celanese admits that at various times asbestos-containing pipe covering was utilized at the Bishop Plant.

REQUEST FOR ADMISSION NO. 249

Admit that asbestos containing pipe insulation was in use at the Bishop facility in 1963.

RESPONSE:

Celanese admits that at various times asbestos-containing pipe covering was utilized at the Bishop Plant.

REQUEST FOR ADMISSION NO. 250

Admit that asbestos containing pipe insulation was in use at the Bishop facility in 1964.

RESPONSE:

Celanese admits that at various times asbestos-containing pipe covering was utilized at the Bishop Plant.

REQUEST FOR ADMISSION NO. 251

Admit that asbestos containing pipe insulation was in use at the Bishop facility in 1965.

RESPONSE:

Celanese admits that at various times asbestos-containing pipe covering was utilized at the Bishop Plant.

REQUEST FOR ADMISSION NO. 252

Admit that asbestos containing pipe insulation was in use at the Bishop facility in 1966.

RESPONSE:

Celanese admits that at various times asbestos-containing pipe covering was utilized at the Bishop Plant.

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REQUEST FOR ADMISSION NO. 253

Admit that asbestos containing pipe insulation was in use at the Bishop facility in 1967.

RESPONSE:

Celanese admits that at various times asbestos-containing pipe covering was utilized at the Bishop Plant.

REQUEST FOR ADMISSION NO. 254

Admit that asbestos containing pipe insulation was in use at the Bishop facility in 1968.

RESPONSE:

Celanese admits that at various times asbestos-containing pipe covering was utilized at the Bishop Plant.

REQUEST FOR ADMISSION NO. 255

Admit that asbestos containing pipe insulation was in use at the Bishop facility in 1969.

RESPONSE:

Celanese admits that at various times asbestos-containing pipe covering was utilized at the Bishop Plant.

REQUEST FOR ADMISSION NO. 256

Admit that asbestos containing pipe insulation was in use at the Bishop facility in 1970.

RESPONSE:

Celanese admits that at various times asbestos-containing pipe covering was utilized at the Bishop Plant.

REQUEST FOR ADMISSION NO. 257

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Admit that asbestos containing pipe insulation was in use at the Bishop facility in 1971.

RESPONSE:

Celanese admits that at various times asbestos-containing pipe covering was utilized at the Bishop Plant.

REQUEST FOR ADMISSION NO. 258

Admit that asbestos containing pipe insulation was in use at the Bishop facility in 1972.

RESPONSE:

Celanese objects to this request as overly broad in that it seeks information outside the time period at issue in this litigation. Celanese further objects to this request because it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

REQUEST FOR ADMISSION NO. 259

Admit that asbestos containing insulating cement was in use at the Bishop facility in 1959.

RESPONSE:

Celanese objects to this request as overly broad in that it seeks information outside the time period at issue in this litigation. Celanese further objects to this request because it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

REQUEST FOR ADMISSION NO. 260

Admit that asbestos containing insulating cement was in use at the Bishop facility in 1960.

RESPONSE:

Celanese objects to this request as overly broad in that it seeks information outside the time period at issue in this litigation. Celanese further objects to this request because it seeks information that is neither relevant nor reasonably calculated to lead to the

discovery of admissible evidence.

REQUEST FOR ADMISSION NO. 261

Admit that asbestos containing insulating cement was in use at the Bishop facility in 1961.

RESPONSE:

Celanese admits that at various times asbestos-containing insulating cement was utilized at the Bishop plant.

REQUEST FOR ADMISSION NO. 262

Admit that asbestos containing insulating cement was in use at the Bishop facility in 1962.

RESPONSE:

Celanese admits that at various times asbestos-containing insulating cement was utilized at the Bishop plant.

REQUEST FOR ADMISSION NO. 263

Admit that asbestos containing insulating cement was in use at the Bishop facility in 1963.

RESPONSE:

Celanese admits that at various times asbestos-containing insulating cement was utilized at the Bishop plant.

REQUEST FOR ADMISSION NO. 264

Admit that asbestos containing insulating cement was in use at the Bishop facility in 1964.

RESPONSE:

Celanese admits that at various times asbestos-containing insulating cement was

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utilized at the Bishop plant.

REQUEST FOR ADMISSION NO. 265

Admit that asbestos containing insulating cement was in use at the Bishop facility in 1965.

RESPONSE:

Celanese admits that at various times asbestos-containing insulating cement was utilized at the Bishop plant.

REQUEST FOR ADMISSION NO. 266

Admit that asbestos containing insulating cement was in use at the Bishop facility in 1966.

RESPONSE:

Celanese admits that at various times asbestos-containing insulating cement was utilized at the Bishop plant.

REQUEST FOR ADMISSION NO. 267.

Admit that asbestos containing insulating cement was in use at the Bishop facility in 1967.

RESPONSE:

Celanese admits that at various times asbestos-containing insulating cement was utilized at the Bishop plant.

REQUEST FOR ADMISSION NO. 268

Admit that asbestos containing insulating cement was in use at the Bishop facility in 1968.

RESPONSE:

Celanese admits that at various times asbestos-containing insulating cement was

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utilized at the Bishop plant.

REQUEST FOR ADMISSION NO. 269

Admit that asbestos containing insulating cement was in use at the Bishop facility in 1969.

RESPONSE:

Celanese admits that at various times asbestos-containing insulating cement was utilized at the Bishop plant.

REQUEST FOR ADMISSION NO. 270

Admit that asbestos containing insulating cement was in use at the Bishop facility in 1970.

RESPONSE:

Celanese admits that at various times asbestos-containing insulating cement was utilized at the Bishop plant.

REQUEST FOR ADMISSION NO. 271

Admit that asbestos containing insulating cement was in use at the Bishop facility in 1971.

RESPONSE:

Celanese admits that at various times asbestos-containing insulating cement was utilized at the Bishop plant.

REQUEST FOR ADMISSION NO. 272

Admit that asbestos containing insulating cement was in use at the Bishop facility in 1972.

RESPONSE:

Celanese objects to this request as overly broad in that it seeks information outside the

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time period at issue in this litigation. Celanese further objects to this request because it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

REQUEST FOR ADMISSION NO. 273

Admit that asbestos containing refractory cement was in use at the Bishop facility in 1959.

RESPONSE:

Celanese objects to this request as overly broad in that it seeks information outside the time period at issue in this litigation. Celanese further objects to this request because it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

REQUEST FOR ADMISSION NO. 274

Admit that asbestos containing refractory cement was in use at the Bishop facility in 1960.

RESPONSE:

Celanese objects to this request as overly broad in that it seeks information outside the time period at issue in this litigation. Celanese further objects to this request because it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

REQUEST FOR ADMISSION NO. 275

Admit that asbestos containing refractory cement was in use at the Bishop facility in 1961.

RESPONSE:

After reasonable inquiry, the information known or reasonably obtainable is insufficient to enable Celanese to admit or deny this request.

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REQUEST FOR ADMISSION NO. 276

Admit that asbestos containing refractory cement was in use at the Bishop facility in 1962.

RESPONSE:

After reasonable inquiry, the information known or reasonably obtainable is insufficient to enable Celanese to admit or deny this request.

REQUEST FOR ADMISSION NO. 277

Admit that asbestos containing refractory cement was in use at the Bishop facility in 1963.

RESPONSE:

After reasonable inquiry, the information known or reasonably obtainable is insufficient to enable Celanese to admit or deny this request.

REQUEST FOR ADMISSION NO. 278

Admit that asbestos containing refractory cement was in use at the Bishop facility in 1964.

RESPONSE:

After reasonable inquiry, the information known or reasonably obtainable is insufficient to enable Celanese to admit or deny this request.

REQUEST FOR ADMISSION NO. 279

Admit that asbestos containing refractory cement was in use at the Bishop facility in 1965.

RESPONSE:

After reasonable inquiry, the information known or reasonably obtainable is insufficient

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to enable Celanese to admit or deny this request.

REQUEST FOR ADMISSION NO. 280

Admit that asbestos containing refractory cement was in use at the Bishop facility in 1966.

RESPONSE:

After reasonable inquiry, the information known or reasonably obtainable is insufficient to enable Celanese to admit or deny this request.

REQUEST FOR ADMISSION NO. 281

Admit that asbestos containing refractory cement was in use at the Bishop facility in 1967.

RESPONSE:

After reasonable inquiry, the information known or reasonably obtainable is insufficient to enable Celanese to admit or deny this request.

REQUEST FOR ADMISSION NO. 282

Admit that asbestos containing refractory cement was in use at the Bishop facility in 1968.

RESPONSE:

After reasonable inquiry, the information known or reasonably obtainable is insufficient to enable Celanese to admit or deny this request.

REQUEST FOR ADMISSION NO. 283

Admit that asbestos containing refractory cement was in use at the Bishop facility in 1969.

RESPONSE:

After reasonable inquiry, the information known or reasonably obtainable is insufficient

to enable Celanese to admit or deny this request.

REQUEST FOR ADMISSION NO. 284

Admit that asbestos containing refractory cement was in use at the Bishop facility in 1970.

RESPONSE:

After reasonable inquiry, the information known or reasonably obtainable is insufficient to enable Celanese to admit or deny this request.

REQUEST FOR ADMISSION NO. 285

Admit that asbestos containing refractory cement was in use at the Bishop facility in 1971.

RESPONSE:

After reasonable inquiry, the information known or reasonably obtainable is insufficient to enable Celanese to admit or deny this request.

REQUEST FOR ADMISSION NO. 286

Admit that asbestos containing refractory cement was in use at the Bishop facility in 1972.

RESPONSE:

Celanese objects to this request as overly broad in that it seeks information outside the time period at issue in this litigation. Celanese further objects to this request because it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

REQUEST FOR ADMISSION NO. 287

Admit that asbestos containing firebrick was in use at the Bishop facility in 1959.

RESPONSE:

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Celanese objects to this request as overly broad in that it seeks information outside the time period at issue in this litigation. Celanese further objects to this request because it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

REQUEST FOR ADMISSION NO. 288

Admit that asbestos containing firebrick was in use at the Bishop facility in 1960.

RESPONSE:

Celanese objects to this request as overly broad in that it seeks information outside the time period at issue in this litigation. Celanese further objects to this request because it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

REQUEST FOR ADMISSION NO. 289

Admit that asbestos containing firebrick was in use at the Bishop facility in 1961.

RESPONSE:

On present information and belief, denied.

REQUEST FOR ADMISSION NO. 290

Admit that asbestos containing firebrick was in use at the Bishop facility in 1962.

RESPONSE:

On present information and belief, denied.

REQUEST FOR ADMISSION NO. 291

Admit that asbestos containing firebrick was in use at the Bishop facility in 1963.

RESPONSE:

On present information and belief, denied.

REQUEST FOR ADMISSION NO. 292

Admit that asbestos containing firebrick was in use at the Bishop facility in 1964.

RESPONSE:

On present information and belief, denied.

REQUEST FOR ADMISSION NO. 293

Admit that asbestos containing firebrick was in use at the Bishop facility in 1965.

RESPONSE:

On present information and belief, denied.

REQUEST FOR ADMISSION NO. 294

Admit that asbestos containing firebrick was in use at the Bishop facility in 1966.

RESPONSE:

On present information and belief, denied.

REQUEST FOR ADMISSION NO. 295

Admit that asbestos containing firebrick was in use at the Bishop facility in 1967.

RESPONSE:

On present information and belief, denied.

REQUEST FOR ADMISSION NO. 296

Admit that asbestos containing firebrick was in use at the Bishop facility in 1968.

RESPONSE:

On present information and belief, denied.

REQUEST FOR ADMISSION NO. 297

Admit that asbestos containing firebrick was in use at the Bishop facility in 1969.

RESPONSE:

On present information and belief, denied.

REQUEST FOR ADMISSION NO. 298

Admit that asbestos containing firebrick was in use at the Bishop facility in 1970.

RESPONSE:

On present information and belief, denied.

REQUEST FOR ADMISSION NO. 299

Admit that asbestos containing firebrick was in use at the Bishop facility in 1971.

RESPONSE:

On present information and belief, denied.

REQUEST FOR ADMISSION NO. 300

Admit that asbestos containing firebrick was in use at the Bishop facility in 1972.

RESPONSE:

Celanese objects to this request as overly broad in that it seeks information outside the time period at issue in this litigation. Celanese further objects to this request because it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

REQUEST FOR ADMISSION NO. 301

Admit that asbestos containing gaskets were in use at the Bishop facility in 1959.

RESPONSE:

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Celanese objects to this request as overly broad in that it seeks information outside the time period at issue in this litigation. Celanese further objects to this request because it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

REQUEST FOR ADMISSION NO. 302

Admit that asbestos containing gaskets were in use at the Bishop facility in 1960.

RESPONSE:

Celanese objects to this request as overly broad in that it seeks information outside the time period at issue in this litigation. Celanese further objects to this request because it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

REQUEST FOR ADMISSION NO. 303

Admit that asbestos containing gaskets were in use at the Bishop facility in 1961.

RESPONSE:

Celanese admits that at various times asbestos-containing gaskets were utilized at the Bishop Plant.

REQUEST FOR ADMISSION NO. 304

Admit that asbestos containing gaskets were in use at the Bishop facility in 1962.

RESPONSE:

Celanese admits that at various times asbestos-containing gaskets were utilized at the Bishop Plant.

REQUEST FOR ADMISSION NO. 305

Admit that asbestos containing gaskets were in use at the Bishop facility in 1963.

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RESPONSE:

Celanese admits that at various times asbestos-containing gaskets were utilized at the Bishop Plant.

REQUEST FOR ADMISSION NO. 306

Admit that asbestos containing gaskets were in use at the Bishop facility in 1964.

RESPONSE:

Celanese admits that at various times asbestos-containing gaskets were utilized at the Bishop Plant.

REQUEST FOR ADMISSION NO. 307

Admit that asbestos containing gaskets were in use at the Bishop facility in 1965.

RESPONSE:

Celanese admits that at various times asbestos-containing gaskets were utilized at the Bishop Plant.

REQUEST FOR ADMISSION NO. 308

Admit that asbestos containing gaskets were in use at the Bishop facility in 1966.

RESPONSE:

Celanese admits that at various times asbestos-containing gaskets were utilized at the Bishop Plant.

REQUEST FOR ADMISSION NO. 309

Admit that asbestos containing gaskets were in use at the Bishop facility in 1967.

RESPONSE:

Celanese admits that at various times asbestos-containing gaskets were utilized at the Bishop Plant.

REQUEST FOR ADMISSION NO. 310

Admit that asbestos containing gaskets were in use at the Bishop facility in 1968.

RESPONSE:

Celanese admits that at various times asbestos-containing gaskets were utilized at the Bishop Plant.

REQUEST FOR ADMISSION NO. 311

Admit that asbestos containing gaskets were in use at the Bishop facility in 1969.

RESPONSE:

Celanese admits that at various times asbestos-containing gaskets were utilized at the Bishop Plant.

REQUEST FOR ADMISSION NO. 312

Admit that asbestos containing gaskets were in use at the Bishop facility in 1970.

RESPONSE:

Celanese admits that at various times asbestos-containing gaskets were utilized at the Bishop Plant.

REQUEST FOR ADMISSION NO. 313

Admit that asbestos containing gaskets were in use at the Bishop facility in 1971.

RESPONSE:

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Celanese admits that at various times asbestos-containing gaskets were utilized at the Bishop Plant.

REQUEST FOR ADMISSION NO. 314

Admit that asbestos containing gaskets were in use at the Bishop facility in 1972.

RESPONSE:

Celanese objects to this request as overly broad in that it seeks information outside the time period at issue in this litigation. Celanese further objects to this request because it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

REQUEST FOR ADMISSION NO. 315

Admit that asbestos containing spray-on fireproofing was in use at the Bishop facility in 1959.

RESPONSE:

Celanese objects to this request as overly broad in that it seeks information outside the time period at issue in this litigation. Celanese further objects to this request because it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

REQUEST FOR ADMISSION NO. 316

Admit that asbestos containing spray-on fireproofing was in use at the Bishop facility in 1960.

RESPONSE:

Celanese objects to this request as overly broad in that it seeks information outside the time period at issue in this litigation. Celanese further objects to this request because it seeks information that is neither relevant nor reasonably calculated to lead to the

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discovery of admissible evidence.

REQUEST FOR ADMISSION NO. 317

Admit that asbestos containing spray-on fireproofing was in use at the Bishop facility in 1961.

RESPONSE:

After reasonable inquiry, the information known or easily obtainable is insufficient to enable Celanese to admit or deny this request.

REQUEST FOR ADMISSION NO. 318

Admit that asbestos containing spray-on fireproofing was in use at the Bishop facility in 1962.

RESPONSE:

After reasonable inquiry, the information known or easily obtainable is insufficient to enable Celanese to admit or deny this request.

REQUEST FOR ADMISSION NO. 319

Admit that asbestos containing spray-on fireproofing was in use at the Bishop facility in 1963.

RESPONSE:

After reasonable inquiry, the information known or easily obtainable is insufficient to enable Celanese to admit or deny this request.

REQUEST FOR ADMISSION NO. 320

Admit that asbestos containing spray-on fireproofing was in use at the Bishop facility in 1964.

RESPONSE:

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After reasonable inquiry, the information known or easily obtainable is insufficient to enable Celanese to admit or deny this request.

REQUEST FOR ADMISSION NO. 322

Admit that asbestos containing spray-on fireproofing was in use at the Bishop facility in 1965.

RESPONSE:

After reasonable inquiry, the information known or easily obtainable is insufficient to enable Celanese to admit or deny this request.

REQUEST FOR ADMISSION NO. 323

Admit that asbestos containing spray-on fireproofing was in use at the Bishop facility in 1966.

RESPONSE:

After reasonable inquiry, the information known or easily obtainable is insufficient to enable Celanese to admit or deny this request.

REQUEST FOR ADMISSION NO. 324

Admit that asbestos containing spray-on fireproofing was in use at the Bishop facility in 1967.

RESPONSE:

After reasonable inquiry, the information known or easily obtainable is insufficient to enable Celanese to admit or deny this request.

REQUEST FOR ADMISSION NO. 325

Admit that asbestos containing spray-on fireproofing was in use at the Bishop facility in

1968.

RESPONSE:

After reasonable inquiry, the information known or easily obtainable is insufficient to enable Celanese to admit or deny this request.

REQUEST FOR ADMISSION NO. 326

Admit that asbestos containing spray-on fireproofing was in use at the Bishop facility in 1969.

RESPONSE:

After reasonable inquiry, the information known or easily obtainable is insufficient to enable Celanese to admit or deny this request.

REQUEST FOR ADMISSION NO. 327

Admit that asbestos containing spray-on fireproofing was in use at the Bishop facility in 1970.

RESPONSE:

After reasonable inquiry, the information known or easily obtainable is insufficient to enable Celanese to admit or deny this request.

REQUEST FOR ADMISSION NO. 328

Admit that asbestos containing spray-on fireproofing was in use at the Bishop facility in 1971.

RESPONSE:

After reasonable inquiry, the information known or easily obtainable is insufficient to enable Celanese to admit or deny this request.

REQUEST FOR ADMISSION NO. 329

Admit that asbestos containing spray-on fireproofing was in use at the Bishop facility in 1972.

RESPONSE:

Celanese objects to this request as overly broad in that it seeks information outside the time period at issue in this litigation. Celanese further objects to this request because it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

REQUEST FOR ADMISSION NO. 330

Admit that asbestos containing boiler insulation was in use at the Bishop facility in 1959.

RESPONSE:

Celanese objects to this request as overly broad in that it seeks information outside the time period at issue in this litigation. Celanese further objects to this request because it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

REQUEST FOR ADMISSION NO. 331

Admit that asbestos containing boiler insulation was in use at the Bishop facility in 1960.

RESPONSE:

Celanese objects to this request as overly broad in that it seeks information outside the time period at issue in this litigation. Celanese further objects to this request because it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

REQUEST FOR ADMISSION NO. 332

Admit that asbestos containing boiler insulation was in use at the Bishop facility in 1961.

RESPONSE:

Celanese admits that at various times asbestos-containing boiler insulation was utilized at the Bishop Plant.

REQUEST FOR ADMISSION NO. 333

Admit that asbestos containing boiler insulation was in use at the Bishop facility in 1962.

RESPONSE:

Celanese admits that at various times asbestos-containing boiler insulation was utilized at the Bishop Plant.

REQUEST FOR ADMISSION NO. 334

Admit that asbestos containing boiler insulation was in use at the Bishop facility in 1963.

RESPONSE:

Celanese admits that at various times asbestos-containing boiler insulation was utilized at the Bishop Plant.

REQUEST FOR ADMISSION NO. 335

Admit that asbestos containing boiler insulation was in use at the Bishop facility in 1964.

RESPONSE:

Celanese admits that at various times asbestos-containing boiler insulation was utilized at the Bishop Plant.

REQUEST FOR ADMISSION NO. 336

Admit that asbestos containing boiler insulation was in use at the Bishop facility in 1965.

RESPONSE:

Celanese admits that at various times asbestos-containing boiler insulation was utilized at the Bishop Plant.

REQUEST FOR ADMISSION NO. 337

Admit that asbestos containing boiler insulation was in use at the Bishop facility in 1966.

RESPONSE:

Celanese admits that at various times asbestos-containing boiler insulation was utilized at the Bishop Plant.

REQUEST FOR ADMISSION NO. 338

Admit that asbestos containing boiler insulation was in use at the Bishop facility in 1967.

RESPONSE:

Celanese admits that at various times asbestos-containing boiler insulation was utilized at the Bishop Plant.

REQUEST FOR ADMISSION NO. 339

Admit that asbestos containing boiler insulation was in use at the Bishop facility in 1968.

RESPONSE:

Celanese admits that at various times asbestos-containing boiler insulation was utilized at the Bishop Plant.

REQUEST FOR ADMISSION NO. 340

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Admit that asbestos containing boiler insulation was in use at the Bishop facility in 1969.

RESPONSE:

Celanese admits that at various times asbestos-containing boiler insulation was utilized at the Bishop Plant.

REQUEST FOR ADMISSION NO. 341

Admit that asbestos containing boiler insulation was in use at the Bishop facility in 1970.

RESPONSE:

Celanese admits that at various times asbestos-containing boiler insulation was utilized at the Bishop Plant.

REQUEST FOR ADMISSION NO. 342

Admit that asbestos containing boiler insulation was in use at the Bishop facility in 1971.

RESPONSE:

Celanese admits that at various times asbestos-containing boiler insulation was utilized at the Bishop Plant.

REQUEST FOR ADMISSION NO. 343

Admit that asbestos containing boiler insulation was in use at the Bishop facility in 1972.

RESPONSE:

Celanese objects to this request as overly broad in that it seeks information outside the time period at issue in this litigation. Celanese further objects to this request because it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

REQUEST FOR ADMISSION NO. 344

Admit that Celanese employees performed insulation using asbestos containing materials at the Bishop facility in 1959.

RESPONSE:

Celanese objects to this request as overly broad in that it seeks information outside the time period at issue in this litigation. Celanese further objects to this request because it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

REQUEST FOR ADMISSION NO. 345

Admit that Celanese employees performed insulation using asbestos containing materials at the Bishop facility in 1960.

RESPONSE:

Celanese objects to this request as overly broad in that it seeks information outside the time period at issue in this litigation. Celanese further objects to this request because it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

REQUEST FOR ADMISSION NO. 346

Admit that Celanese employees performed insulation using asbestos containing materials at the Bishop facility in 1961.

RESPONSE:

Celanese objects to this request on the grounds that the information sought is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving the foregoing objections, on present information and belief, denied as stated.

REQUEST FOR ADMISSION NO. 347

Admit that Celanese employees performed insulation using asbestos containing

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materials at the Bishop facility in 1962.

RESPONSE:

Celanese objects to this request on the grounds that the information sought is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

On present information and belief, denied as stated.

REQUEST FOR ADMISSION NO. 348

Admit that Celanese employees performed insulation using asbestos containing materials at the Bishop facility in 1963.

RESPONSE:

Celanese objects to this request on the grounds that the information sought is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving the foregoing objections, on present information and belief, denied as stated.

REQUEST FOR ADMISSION NO. 349

Admit that Celanese employees performed insulation using asbestos containing materials at the Bishop facility in 1964.

RESPONSE:

Celanese objects to this request on the grounds that the information sought is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving the foregoing objections, on present information and belief, denied as stated.

REQUEST FOR ADMISSION NO. 350

Admit that Celanese employees performed insulation using asbestos containing materials at the Bishop facility in 1965.

RESPONSE:

Celanese objects to this request on the grounds that the information sought is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving the foregoing objections, on present information and belief, denied as stated.

REQUEST FOR ADMISSION NO. 351

Admit that Celanese employees performed insulation using asbestos containing materials at the Bishop facility in 1966.

RESPONSE:

Celanese objects to this request on the grounds that the information sought is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving the foregoing objections, on present information and belief, denied as stated.

REQUEST FOR ADMISSION NO. 352

Admit that Celanese employees performed insulation using asbestos containing materials at the Bishop facility in 1967.

RESPONSE:

Celanese objects to this request on the grounds that the information sought is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving the foregoing objections, on present information and belief, denied as stated.

REQUEST FOR ADMISSION NO. 353

Admit that Celanese employees performed insulation using asbestos containing materials at the Bishop facility in 1968.

RESPONSE:

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Celanese objects to this request on the grounds that the information sought is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving the foregoing objections, on present information and belief, denied as stated.

REQUEST FOR ADMISSION NO. 354

Admit that Celanese employees performed insulation using asbestos containing materials at the Bishop facility in 1969.

RESPONSE:

Celanese objects to this request on the grounds that the information sought is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving the foregoing objections, on present information and belief, denied as stated.

REQUEST FOR ADMISSION NO. 355

Admit that Celanese employees performed insulation using asbestos containing materials at the Bishop facility in 1970.

RESPONSE:

Celanese objects to this request on the grounds that the information sought is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving the foregoing objections, on present information and belief, denied as stated.

REQUEST FOR ADMISSION NO. 356

Admit that Celanese employees performed insulation using asbestos containing materials at the Bishop facility in 1971.

RESPONSE:

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Celanese objects to this request on the grounds that the information sought is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving the foregoing objections, on present information and belief, denied as stated.

REQUEST FOR ADMISSION NO. 357

Admit that Celanese employees performed insulation using asbestos containing materials at the Bishop facility in 1972.

RESPONSE:

Celanese objects to this request as overly broad in that it seeks information outside the time period at issue in this litigation. Celanese further objects to this request because it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

REQUEST FOR ADMISSION NO. 358

Admit that Celanese did not employ any corporate level industrial hygienists before 1966.

RESPONSE:

Celanese objects to this request as duplicative of Request for Admission Nos. 48. See answer to Request for Admission No. 48.

REQUEST FOR ADMISSION NO. 359

Admit that the Celanese Bishop facility first employed an industrial hygienist before 1966.

RESPONSE:

Celanese admits it did not have an industrial hygienist on the direct company payroll at the Bishop plant before 1966, although on information and belief the Bishop facility obtained industrial hygiene services from Celanese's insurance carriers prior to that time.

REQUEST FOR ADMISSION NO. 360

Admit that no Celanese employee was trained to do airborne dust sampling before 1966.

RESPONSE:

Celanese objects to this request as vague, ambiguous and overly broad in that it seeks information outside the time period at issue in this litigation. Celanese also objects to this request as overly broad and harassing in that it is not limited to the plant at issue in this case. Celanese further objects to this request on the grounds that it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving the foregoing objections, after reasonable inquiry, the information known or reasonably obtainable is insufficient to enable Celanese to admit or deny this request.

REQUEST FOR ADMISSION NO. 361

Admit that no Celanese employee was trained to airborne dust monitoring before 1966.

RESPONSE:

Celanese objects to this request as vague, ambiguous and overly broad in that it seeks information outside the time period at issue in this litigation. Celanese also objects to this request as overly broad and harassing in that it is not limited to the plant at issue in this case. Celanese further objects to this request on the grounds that it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving the foregoing objections, after reasonable inquiry, the information known or reasonably obtainable is insufficient to enable Celanese to admit or deny this request.

REQUEST FOR ADMISSION NO. 362

Admit that Celanese did not conduct any medical monitoring of contractor boilermakers for asbestos exposure from 1959-1972.

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RESPONSE:

Celanese objects to this request as overly broad to the extent that it seeks information outside the time period at issue in this litigation. Celanese also objects to this request as overly broad and harassing in that it is not limited to the plant at issue in this case. Celanese further objects to this request because it is vague and ambiguous, in that the term "medical monitoring" is undefined and it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving the foregoing general and specific objections, Celanese on information and belief admits this request, but denies that it had any duty to provide such services to independent contractor companies. Celanese further states in connection with this response that the obligation, if any, to provide medical monitoring to independent contractor employees would have rested with the independent contractor companies that employed them.

REQUEST FOR ADMISSION NO. 363

Admit that Celanese did not conduct any medical monitoring of contractor laborers for asbestos exposure from 1959-1972.

RESPONSE:

Celanese objects to this request as overly broad to the extent that it seeks information outside the time period at issue in this litigation. Celanese also objects to this request as overly broad and harassing in that it is not limited to the plant at issue in this case. Celanese further objects to this request because it is vague and ambiguous, in that the term "medical monitoring" is undefined and it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving the foregoing general and specific objections, Celanese on information and belief admits this request, but denies that it had any duty to provide such services to independent contractor companies. Celanese further states in connection with this response that the obligation, if any, to provide medical monitoring to independent contractor employees would have rested with the independent contractor companies that employed them.

REQUEST FOR ADMISSION NO. 364

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Admit that Celanese did not conduct any medical monitoring of contractor insulators for asbestos exposure from 1959-1972.

RESPONSE:

Celanese objects to this request as overly broad to the extent that it seeks information outside the time period at issue in this litigation. Celanese also objects to this request as overly broad and harassing in that it is not limited to the plant at issue in this case. Celanese further objects to this request because it is vague and ambiguous, in that the term "medical monitoring" is undefined and it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving the foregoing general and specific objections, Celanese on information and belief admits this request, but denies that it had any duty to provide such services to independent contractor companies. Celanese further states in connection with this response that the obligation, if any, to provide medical monitoring to independent contractor employees would have rested with the independent contractor companies that employed them.

REQUEST FOR ADMISSION NO. 365

Admit that Celanese did not conduct any medical monitoring of contractor pipefitters for asbestos exposure from 1959-1972.

RESPONSE:

Celanese objects to this request as overly broad to the extent that it seeks information outside the time period at issue in this litigation. Celanese also objects to this request as overly broad and harassing in that it is not limited to the plant at issue in this case. Celanese further objects to this request because it is vague and ambiguous, in that the term "medical monitoring" is undefined and it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving the foregoing general and specific objections, Celanese on information and belief admits this request, but denies that it had any duty to provide such services to independent contractor companies. Celanese further states in connection with this response that the obligation, if any, to provide medical monitoring to independent contractor employees would have rested with the independent contractor companies that employed them.

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REQUEST FOR ADMISSION NO. 366

Admit that Celanese did not conduct any medical monitoring of contractor welders for asbestos exposure from 1959-1972.

RESPONSE:

Celanese objects to this request as overly broad to the extent that it seeks information outside the time period at issue in this litigation. Celanese also objects to this request as overly broad and harassing in that it is not limited to the plant at issue in this case. Celanese further objects to this request because it is vague and ambiguous, in that the term "medical monitoring" is undefined and it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving the foregoing general and specific objections, Celanese on information and belief admits this request, but denies that it had any duty to provide such services to independent contractor companies. Celanese further states in connection with this response that the obligation, if any, to provide medical monitoring to independent contractor employees would have rested with the independent contractor companies that employed them.

REQUEST FOR ADMISSION NO. 367

Admit that Celanese medical department personnel received the Journal of the American Medical Association in 1959:

RESPONSE:

Celanese objects to this request as overly broad in that it seeks information outside the time period at issue in this litigation. Celanese further objects to this request because it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

REQUEST FOR ADMISSION NO. 368

Admit that Celanese medical department personnel received the Journal of the American Medical Association in 1960:

RESPONSE:

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Celanese objects to this request as overly broad in that it seeks information outside the time period at issue in this litigation. Celanese further objects to this request because it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

REQUEST FOR ADMISSION NO. 369

Admit that Celanese medical department personnel received the Journal of the American Medical Association in 1961:

RESPONSE:

Celanese objects to this request on the grounds that it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving the foregoing objections, on information and belief, Celanese admits that some personnel in its medical department likely either received or had access to the referenced publication during the stated time period.

REQUEST FOR ADMISSION NO. 370

Admit that Celanese medical department personnel received the Journal of the American Medical Association in 1962:

RESPONSE:

Celanese objects to this request on the grounds that it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving the foregoing objections, on information and belief, Celanese admits that some personnel in its medical department likely either received or had access to the referenced publication during the stated time period.

REQUEST FOR ADMISSION NO. 371

Admit that Celanese medical department personnel received the Journal of the American Medical Association in 1963:

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RESPONSE:

Celanese objects to this request on the grounds that it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving the foregoing objections, on information and belief, Celanese admits that some personnel in its medical department likely either received or had access to the referenced publication during the stated time period.

REQUEST FOR ADMISSION NO. 372

Admit that Celanese medical department personnel received the Journal of the American Medical Association in 1964:

RESPONSE:

Celanese objects to this request on the grounds that it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving the foregoing objections, on information and belief, Celanese admits that some personnel in its medical department likely either received or had access to the referenced publication during the stated time period.

REQUEST FOR ADMISSION NO. 373

Admit that Celanese medical department personnel received the Journal of the American Medical Association in 1965:

RESPONSE:

Celanese objects to this request on the grounds that it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving the foregoing objections, on information and belief, Celanese admits that some personnel in its medical department likely either received or had access to the referenced publication during the stated time period.

REQUEST FOR ADMISSION NO. 374

Admit that Celanese medical department personnel received the Journal of the American Medical Association in 1966:

RESPONSE:

Celanese objects to this request on the grounds that it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving the foregoing objections, on information and belief, Celanese admits that some personnel in its medical department likely either received or had access to the referenced publication during the stated time period.

REQUEST FOR ADMISSION NO. 375

Admit that Celanese medical department personnel received the Journal of the American Medical Association in 1967:

RESPONSE:

Celanese objects to this request on the grounds that it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving the foregoing objections, on information and belief, Celanese admits that some personnel in its medical department likely either received or had access to the referenced publication during the stated time period.

REQUEST FOR ADMISSION NO. 376

Admit that Celanese medical department personnel received the Journal of the American Medical Association in 1968:

RESPONSE:

Celanese objects to this request on the grounds that it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving the foregoing objections, on information and belief, Celanese admits that some personnel in its medical department likely either received or

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had access to the referenced publication during the stated time period.

REQUEST FOR ADMISSION NO. 377

Admit that Celanese medical department personnel received the Journal of the American Medical Association in 1969:

RESPONSE:

Celanese objects to this request on the grounds that it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving the foregoing objections, on information and belief, Celanese admits that some personnel in its medical department likely either received or had access to the referenced publication during the stated time period.

REQUEST FOR ADMISSION NO. 378

Admit that Celanese medical department personnel received the Journal of the American Medical Association in 1970:

RESPONSE:

Celanese objects to this request on the grounds that it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving the foregoing objections, on information and belief, Celanese admits that some personnel in its medical department likely either received or had access to the referenced publication during the stated time period.

REQUEST FOR ADMISSION NO. 379

Admit that Celanese medical department personnel received the Journal of the American Medical Association in 1971:

RESPONSE:

Celanese objects to this request on the grounds that it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

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Subject to and without waiving the foregoing objections, on information and belief, Celanese admits that some personnel in its medical department likely either received or had access to the referenced publication during the stated time period.

REQUEST FOR ADMISSION NO. 380

Admit that Celanese medical department personnel received the Journal of the American Medical Association in 1972:

RESPONSE:

Celanese objects to this request as overly broad in that it seeks information outside the time period at issue in this litigation. Celanese further objects to this request because it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

REQUEST FOR ADMISSION NO. 381

Admit that Celanese medical department personnel received the Industrial Medicine publication in 1959:

RESPONSE:

Celanese objects to this request as overly broad in that it seeks information outside the time period at issue in this litigation. Celanese further objects to this request because it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

REQUEST FOR ADMISSION NO. 382

Admit that Celanese medical department personnel received the Industrial Medicine publication in 1960:

RESPONSE:

Celanese objects to this request as overly broad in that it seeks information outside the time period at issue in this litigation. Celanese further objects to this request because it seeks information that is neither relevant nor reasonably calculated to lead to the

discovery of admissible evidence.

REQUEST FOR ADMISSION NO. 383

Admit that Celanese medical department personnel received the Industrial Medicine publication in 1961:

RESPONSE:

Celanese objects to this request on the grounds that it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving the foregoing objections, Celanese can neither admit nor deny this request because the publication at issue is insufficiently identified.

REQUEST FOR ADMISSION NO. 384

Admit that Celanese medical department personnel received the Industrial Medicine publication in 1962:

RESPONSE:

Celanese objects to this request on the grounds that it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving the foregoing objections, Celanese can neither admit nor deny this request because the publication at issue is insufficiently identified.

REQUEST FOR ADMISSION NO. 385

Admit that Celanese medical department personnel received the Industrial Medicine publication in 1963:

RESPONSE:

Celanese objects to this request on the grounds that it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving the foregoing objections, Celanese can neither admit nor

deny this request because the publication at issue is insufficiently identified.

REQUEST FOR ADMISSION NO. 386

Admit that Celanese medical department personnel received the Industrial Medicine publication in 1964:

RESPONSE:

Celanese objects to this request on the grounds that it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving the foregoing objections, Celanese can neither admit nor deny this request because the publication at issue is insufficiently identified.

REQUEST FOR ADMISSION NO. 387

Admit that Celanese medical department personnel received the Industrial Medicine publication in 1965:

RESPONSE:

Celanese objects to this request on the grounds that it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving the foregoing objections, Celanese can neither admit nor deny this request because the publication at issue is insufficiently identified.

REQUEST FOR ADMISSION NO. 388

Admit that Celanese medical department personnel received the Industrial Medicine publication in 1966:

RESPONSE:

Celanese objects to this request on the grounds that it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving the foregoing objections, Celanese can neither admit nor deny this request because the publication at issue is insufficiently identified.

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REQUEST FOR ADMISSION NO. 389

Admit that Celanese medical department personnel received the Industrial Medicine publication in 1967:

RESPONSE:

Celanese objects to this request on the grounds that it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving the foregoing objections, Celanese can neither admit nor deny this request because the publication at issue is insufficiently identified.

REQUEST FOR ADMISSION NO. 390

Admit that Celanese medical department personnel received the Industrial Medicine publication in 1968:

RESPONSE:

Celanese objects to this request on the grounds that it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving the foregoing objections, Celanese can neither admit nor deny this request because the publication at issue is insufficiently identified.

REQUEST FOR ADMISSION NO. 391

Admit that Celanese medical department personnel received the Industrial Medicine publication in 1969:

RESPONSE:

Celanese objects to this request on the grounds that it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving the foregoing objections, Celanese can neither admit nor deny this request because the publication at issue is insufficiently identified.

REQUEST FOR ADMISSION NO. 392

Admit that Celanese medical department personnel received the Industrial Medicine publication in 1970:

RESPONSE:

Celanese objects to this request on the grounds that it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving the foregoing objections, Celanese can neither admit nor deny this request because the publication at issue is insufficiently identified.

REQUEST FOR ADMISSION NO. 393

Admit that Celanese medical department personnel received the Industrial Medicine publication in 1971:

RESPONSE:

Celanese objects to this request on the grounds that it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving the foregoing objections, Celanese can neither admit nor deny this request because the publication at issue is insufficiently identified.

REQUEST FOR ADMISSION NO. 394

Admit that Celanese medical department personnel received the Industrial Medicine publication in 1972:

RESPONSE:

Celanese objects to this request as overly broad in that it seeks information outside the time period at issue in this litigation. Celanese further objects to this request because it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

REQUEST FOR ADMISSION NO. 395

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Admit that Celanese medical department personnel received the Journal of Industrial Hygiene and Toxicology in 1959:

RESPONSE:

Celanese objects to this request as overly broad in that it seeks information outside the time period at issue in this litigation. Celanese further objects to this request because it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

REQUEST FOR ADMISSION NO. 396

Admit that Celanese medical department personnel received the Journal of Industrial Hygiene and Toxicology in 1960:

RESPONSE:

Celanese objects to this request as overly broad in that it seeks information outside the time period at issue in this litigation. Celanese further objects to this request because it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

REQUEST FOR ADMISSION NO. 397

Admit that Celanese medical department personnel received the Journal of Industrial Hygiene and Toxicology in 1961:

RESPONSE:

Celanese objects to this request because it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving the foregoing objections, on information and belief, Celanese admits that some personnel in its medical department likely either received or had access to the referenced publication during the stated time period.

REQUEST FOR ADMISSION NO. 398

Celanese Ltd.'s Responses to Plaintiff
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Admit that Celanese medical department personnel received the Journal of Industrial Hygiene and Toxicology in 1962:

RESPONSE:

Celanese objects to this request because it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving the foregoing objections, on information and belief, Celanese admits that some personnel in its medical department likely either received or had access to the referenced publication during the stated time period.

REQUEST FOR ADMISSION NO. 399

Admit that Celanese medical department personnel received the Journal of Industrial Hygiene and Toxicology in 1963:

RESPONSE:

Celanese objects to this request because it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving the foregoing objections, on information and belief, Celanese admits that some personnel in its medical department likely either received or had access to the referenced publication during the stated time period.

REQUEST FOR ADMISSION NO. 400

Admit that Celanese medical department personnel received the Journal of Industrial Hygiene and Toxicology in 1964:

RESPONSE:

Celanese objects to this request because it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving the foregoing objections, on information and belief, Celanese admits that some personnel in its medical department likely either received or

had access to the referenced publication during the stated time period.

REQUEST FOR ADMISSION NO. 401

Admit that Celanese medical department personnel received the Journal of Industrial Hygiene and Toxicology in 1965:

RESPONSE:

Celanese objects to this request because it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving the foregoing objections, on information and belief, Celanese admits that some personnel in its medical department likely either received or had access to the referenced publication during the stated time period.

REQUEST FOR ADMISSION NO. 402

Admit that Celanese medical department personnel received the Journal of Industrial Hygiene and Toxicology in 1966:

RESPONSE:

Celanese objects to this request because it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving the foregoing objections, on information and belief, Celanese admits that some personnel in its medical department likely either received or had access to the referenced publication during the stated time period.

REQUEST FOR ADMISSION NO. 403

Admit that Celanese medical department personnel received the Journal of Industrial Hygiene and Toxicology in 1967:

RESPONSE:

Celanese objects to this request because it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

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Subject to and without waiving the foregoing objections, on information and belief, Celanese admits that some personnel in its medical department likely either received or had access to the referenced publication during the stated time period.

REQUEST FOR ADMISSION NO. 404

Admit that Celanese medical department personnel received the Journal of Industrial Hygiene and Toxicology in 1968:

RESPONSE:

Celanese objects to this request because it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving the foregoing objections, on information and belief, Celanese admits that some personnel in its medical department likely either received or had access to the referenced publication during the stated time period.

REQUEST FOR ADMISSION NO. 405

Admit that Celanese medical department personnel received the Journal of Industrial Hygiene and Toxicology in 1969:

RESPONSE:

Celanese objects to this request because it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving the foregoing objections, on information and belief, Celanese admits that some personnel in its medical department likely either received or had access to the referenced publication during the stated time period.

REQUEST FOR ADMISSION NO. 406

Admit that Celanese medical department personnel received the Journal of Industrial Hygiene and Toxicology in 1970:

RESPONSE:

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Celanese objects to this request because it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving the foregoing objections, on information and belief, Celanese admits that some personnel in its medical department likely either received or had access to the referenced publication during the stated time period.

REQUEST FOR ADMISSION NO. 407

Admit that Celanese medical department personnel received the Journal of Industrial Hygiene and Toxicology in 1971:

RESPONSE:

Celanese objects to this request because it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving the foregoing objections, on information and belief, Celanese admits that some personnel in its medical department likely either received or had access to the referenced publication during the stated time period.

REQUEST FOR ADMISSION NO. 408

Admit that Celanese medical department personnel received the Journal of Industrial Hygiene and Toxicology in 1972:

RESPONSE:

Celanese objects to this request as overly broad in that it seeks information outside the time period at issue in this litigation. Celanese further objects to this request because it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

REQUEST FOR ADMISSION NO. 409

Admit that Celanese medical department personnel received the National Safety News in 1959:

RESPONSE:

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Celanese objects to this request as overly broad in that it seeks information outside the time period at issue in this litigation. Celanese further objects to this request because it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

REQUEST FOR ADMISSION NO. 410

Admit that Celanese medical department personnel received the National Safety News in 1960:

RESPONSE:

Celanese objects to this request as overly broad in that it seeks information outside the time period at issue in this litigation. Celanese further objects to this request because it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

REQUEST FOR ADMISSION NO. 411

Admit that Celanese medical department personnel received the National Safety News in 1961:

RESPONSE:

Celanese objects to this request because it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving the foregoing objections, on information and belief, Celanese admits that some company personnel likely either received or had access to the referenced publication during the stated period.

REQUEST FOR ADMISSION NO. 412

Admit that Celanese medical department personnel received the National Safety News in 1962:

RESPONSE:

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Celanese objects to this request because it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving the foregoing objections, on information and belief, Celanese admits that some company personnel likely either received or had access to the referenced publication during the stated period.

REQUEST FOR ADMISSION NO. 413

Admit that Celanese medical department personnel received the National Safety News in 1963:

RESPONSE:

Celanese objects to this request because it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving the foregoing objections, on information and belief, Celanese admits that some company personnel likely either received or had access to the referenced publication during the stated period.

REQUEST FOR ADMISSION NO. 414

Admit that Celanese medical department personnel received the National Safety News in 1964

RESPONSE:

Celanese objects to this request because it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving the foregoing objections, on information and belief, Celanese admits that some company personnel likely either received or had access to the referenced publication during the stated period.

REQUEST FOR ADMISSION NO. 415

Admit that Celanese medical department personnel received the National Safety News in 1965:

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RESPONSE:

Celanese objects to this request because it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving the foregoing objections, on information and belief, Celanese admits that some company personnel likely either received or had access to the referenced publication during the stated period.

REQUEST FOR ADMISSION NO. 416

Admit that Celanese medical department personnel received the National Safety News in 1966:

RESPONSE:

Celanese objects to this request because it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving the foregoing objections, on information and belief, Celanese admits that some company personnel likely either received or had access to the referenced publication during the stated period.

REQUEST FOR ADMISSION NO. 417

Admit that Celanese medical department personnel received the National Safety News in 1967:

RESPONSE:

Celanese objects to this request because it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving the foregoing objections, on information and belief, Celanese admits that some company personnel likely either received or had access to the referenced publication during the stated period.

REQUEST FOR ADMISSION NO. 418

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Admit that Celanese medical department personnel received the National Safety News in 1968:

RESPONSE:

Celanese objects to this request because it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving the foregoing objections, on information and belief, Celanese admits that some company personnel likely either received or had access to the referenced publication during the stated period.

REQUEST FOR ADMISSION NO. 419

Admit that Celanese medical department personnel received the National Safety News in 1969:

RESPONSE:

Celanese objects to this request because it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving the foregoing objections, on information and belief, Celanese admits that some company personnel likely either received or had access to the referenced publication during the stated period.

REQUEST FOR ADMISSION NO. 420

Admit that Celanese medical department personnel received the National Safety News in 1970:

RESPONSE:

Celanese objects to this request because it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving the foregoing objections, on information and belief, Celanese admits that some company personnel likely either received or had access to the referenced publication during the stated period.

REQUEST FOR ADMISSION NO. 421

Admit that Celanese medical department personnel received the National Safety News in 1971:

RESPONSE:

Celanese objects to this request because it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving the foregoing objections, on information and belief, Celanese admits that some company personnel likely either received or had access to the referenced publication during the stated period.

REQUEST FOR ADMISSION NO. 422

Admit that Celanese medical department personnel received the National Safety News in 1972:

RESPONSE:

Celanese objects to this request as overly broad in that it seeks information outside the time period at issue in this litigation. Celanese further objects to this request because it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

REQUEST FOR ADMISSION NO. 423

Admit that Celanese medical department personnel received the Industrial Hygiene Foundation Digest in 1959:

RESPONSE:

Celanese objects to this request as overly broad in that it seeks information outside the time period at issue in this litigation. Celanese further objects to this request because it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

REQUEST FOR ADMISSION NO. 424

Celanese Ltd.'s Responses to Plaintiff
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Admit that Celanese medical department personnel received the Industrial Hygiene Foundation Digest in 1960:

RESPONSE:

Celanese objects to this request as overly broad in that it seeks information outside the time period at issue in this litigation. Celanese further objects to this request because it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

REQUEST FOR ADMISSION NO. 425

Admit that Celanese medical department personnel received the Industrial Hygiene Foundation Digest in 1961:

RESPONSE:

Celanese objects to this request because it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving the foregoing objections, on information and belief, Celanese admits that some personnel in its medical department likely either received or had access to the referenced publication during the stated time period.

REQUEST FOR ADMISSION NO. 426

Admit that Celanese medical department personnel received the Industrial Hygiene Foundation Digest in 1962:

RESPONSE:

Celanese objects to this request because it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving the foregoing objections, on information and belief, Celanese admits that some personnel in its medical department likely either received or had access to the referenced publication during the stated time period.

REQUEST FOR ADMISSION NO. 427

Celanese Ltd.'s Responses to Plaintiff
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Admit that Celanese medical department personnel received the Industrial Hygiene Foundation Digest in 1963:

RESPONSE:

Celanese objects to this request because it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving the foregoing objections, on information and belief, Celanese admits that some personnel in its medical department likely either received or had access to the referenced publication during the stated time period.

REQUEST FOR ADMISSION NO. 428

Admit that Celanese medical department personnel received the Industrial Hygiene Foundation Digest in 1964:

RESPONSE:

Celanese objects to this request because it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving the foregoing objections, on information and belief, Celanese admits that some personnel in its medical department likely either received or had access to the referenced publication during the stated time period.

REQUEST FOR ADMISSION NO. 429

Admit that Celanese medical department personnel received the Industrial Hygiene Foundation Digest in 1965:

RESPONSE:

Celanese objects to this request because it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving the foregoing objections, on information and belief, Celanese admits that some personnel in its medical department likely either received or had access to the referenced publication during the stated time period.

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REQUEST FOR ADMISSION NO. 430

Admit that Celanese medical department personnel received the Industrial Hygiene Foundation Digest in 1966:

RESPONSE:

Celanese objects to this request because it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving the foregoing objections, on information and belief, Celanese admits that some personnel in its medical department likely either received or had access to the referenced publication during the stated time period.

REQUEST FOR ADMISSION NO. 431

Admit that Celanese medical department personnel received the Industrial Hygiene Foundation Digest in 1967:

RESPONSE:

Celanese objects to this request because it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving the foregoing objections, on information and belief, Celanese admits that some personnel in its medical department likely either received or had access to the referenced publication during the stated time period.

REQUEST FOR ADMISSION NO. 432

Admit that Celanese medical department personnel received the Industrial Hygiene Foundation Digest in 1968:

RESPONSE:

Celanese objects to this request because it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving the foregoing objections, on information and belief,

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Celanese admits that some personnel in its medical department likely either received or had access to the referenced publication during the stated time period.

REQUEST FOR ADMISSION NO. 433

Admit that Celanese medical department personnel received the Industrial Hygiene Foundation Digest in 1969:

RESPONSE:

Celanese objects to this request because it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving the foregoing objections, on information and belief, Celanese admits that some personnel in its medical department likely either received or had access to the referenced publication during the stated time period.

REQUEST FOR ADMISSION NO. 434

Admit that Celanese medical department personnel received the Industrial Hygiene Foundation Digest in 1970:

RESPONSE:

Celanese objects to this request because it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving the foregoing objections, on information and belief, Celanese admits that some personnel in its medical department likely either received or had access to the referenced publication during the stated time period.

REQUEST FOR ADMISSION NO. 435

Admit that Celanese medical department personnel received the Industrial Hygiene Foundation Digest in 1971:

RESPONSE:

Celanese objects to this request because it seeks information that is neither relevant

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nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving the foregoing objections, on information and belief, Celanese admits that some personnel in its medical department likely either received or had access to the referenced publication during the stated time period.

REQUEST FOR ADMISSION NO. 436

Admit that Celanese medical department personnel received the Industrial Hygiene Foundation Digest in 1972:

RESPONSE:

Celanese objects to this request as overly broad in that it seeks information outside the time period at issue in this litigation. Celanese further objects to this request because it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

REQUEST FOR ADMISSION NO. 437

Admit that Celanese medical department personnel received the Public Health Reports of the United States Public Health Service in 1959:

RESPONSE:

Celanese objects to this request as overly broad in that it seeks information outside the time period at issue in this litigation. Celanese further objects to this request because it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

REQUEST FOR ADMISSION NO. 438

Admit that Celanese medical department personnel received the Public Health Reports of the United States Public Health Service in 1960:

RESPONSE:

Celanese objects to this request as overly broad in that it seeks information outside the time period at issue in this litigation. Celanese further objects to this request because it

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seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

REQUEST FOR ADMISSION NO. 439

Admit that Celanese medical department personnel received the Public Health Reports of the United States Public Health Service in 1961.

RESPONSE:

Celanese objects to this request because it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving the foregoing objections, after reasonable inquiry, the information known or reasonably obtainable is insufficient to enable Celanese to admit or deny that personnel in its medical department received all USPHS reports generated during the stated period.

REQUEST FOR ADMISSION NO. 440

Admit that Celanese medical department personnel received the Public Health Reports of the United States Public Health Service in 1962.

RESPONSE:

Celanese objects to this request because it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving the foregoing objections, after reasonable inquiry, the information known or reasonably obtainable is insufficient to enable Celanese to admit or deny that personnel in its medical department received all USPHS reports generated during the stated period.

REQUEST FOR ADMISSION NO. 441

Admit that Celanese medical department personnel received the Public Health Reports of the United States Public Health Service in 1963:

RESPONSE:

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Celanese objects to this request because it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving the foregoing objections, after reasonable inquiry, the information known or reasonably obtainable is insufficient to enable Celanese to admit or deny that personnel in its medical department received all USPHS reports generated during the stated period.

REQUEST FOR ADMISSION NO. 442

Admit that Celanese medical department personnel received the Public Health Reports of the United States Public Health Service in 1964:

RESPONSE:

Celanese objects to this request because it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving the foregoing objections, after reasonable inquiry, the information known or reasonably obtainable is insufficient to enable Celanese to admit or deny that personnel in its medical department received all USPHS reports generated during the stated period.

REQUEST FOR ADMISSION NO. 443

Admit that Celanese medical department personnel received the Public Health Reports of the United States Public Health Service in 1965:

RESPONSE:

Celanese objects to this request because it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving the foregoing objections, after reasonable inquiry, the information known or reasonably obtainable is insufficient to enable Celanese to admit or deny that personnel in its medical department received all USPHS reports generated during the stated period.

REQUEST FOR ADMISSION NO. 444

Celanese Ltd.'s Responses to Plaintiff
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Admit that Celanese medical department personnel received Public Health Reports of the United States Public Health Service in 1966

RESPONSE:

Celanese objects to this request because it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving the foregoing objections, after reasonable inquiry, the information known or reasonably obtainable is insufficient to enable Celanese to admit or deny that personnel in its medical department received all USPHS reports generated during the stated period.

REQUEST FOR ADMISSION NO. 445

Admit that Celanese medical department personnel received the Public Health Reports of the United States Public Health Service in 1967:

RESPONSE:

Celanese objects to this request because it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving the foregoing objections, after reasonable inquiry, the information known or reasonably obtainable is insufficient to enable Celanese to admit or deny that personnel in its medical department received all USPHS reports generated during the stated period.

REQUEST FOR ADMISSION NO. 446

Admit that Celanese medical department personnel received the Public Health Reports of the United States Public Health Service in 1968:

RESPONSE:

Celanese objects to this request because it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving the foregoing objections, after reasonable inquiry, the information known or reasonably obtainable is insufficient to enable Celanese to admit or deny that personnel in its medical department received all USPHS reports generated during the stated period.

REQUEST FOR ADMISSION NO. 447

Admit that Celanese medical department personnel received the Public Health Reports of the United States Public Health Service in 1969:

RESPONSE:

Celanese objects to this request because it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving the foregoing objections, after reasonable inquiry, the information known or reasonably obtainable is insufficient to enable Celanese to admit or deny that personnel in its medical department received all USPHS reports generated during the stated period.

REQUEST FOR ADMISSION NO. 448

Admit that Celanese medical department personnel received the Public Health Reports of the United States Public Health Service in 1970:

RESPONSE:

Celanese objects to this request because it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving the foregoing objections, after reasonable inquiry, the information known or reasonably obtainable is insufficient to enable Celanese to admit or deny that personnel in its medical department received all USPHS reports generated during the stated period.

REQUEST FOR ADMISSION NO. 449

Admit that Celanese medical department personnel received the Public Health Reports of the United States Public Health Service in 1971

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RESPONSE:

Celanese objects to this request because it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving the foregoing objections, after reasonable inquiry, the information known or reasonably obtainable is insufficient to enable Celanese to admit or deny that personnel in its medical department received all USPHS reports generated during the stated period.

REQUEST FOR ADMISSION NO. 450

Admit that Celanese medical department personnel received the Public Health Reports of the United States Public Health Service in 1972:

RESPONSE:

Celanese objects to this request as overly broad in that it seeks information outside the time period at issue in this litigation. Celanese further objects to this request because it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

REQUEST FOR ADMISSION NO. 466

Admit that Celanese knew pneumoconiosis was a danger in 1951.

RESPONSE:

Celanese objects to this request as overly broad in that it seeks information outside the time period at issue in this litigation. Celanese further objects to this request because it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving the foregoing objections, after reasonable inquiry, the information known or reasonably obtainable is insufficient to enable Celanese to admit or deny this request.

REQUEST FOR ADMISSION NO. 467

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Admit that a Celanese employee reported that he had suffered a dust-related injury in 1951.

RESPONSE:

Celanese objects to this request as overly broad in that it is not properly limited to the time period and/or plant at issue in this case. Celanese further objects to this request because it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving the foregoing objections, on present information, Celanese is aware of nothing to suggest that an employee dust-related injury was reported in 1951, that such injury was reported to it or that any such injury related to asbestos dust, and thus must deny this request.

REQUEST FOR ADMISSION NO. 468

Admit that Celanese did not institute a program to train it's employees about airborne dust hazards before 1966.

RESPONSE:

Celanese objects to this request on the grounds that it is vague, ambiguous, and overly broad in that it is not properly limited to the time period and/or plant at issue. Celanese further objects to this request on the grounds that it seeks information that is irrelevant and not reasonable calculated to lead to the discovery of admissible evidence.

Subject to and without waiving the foregoing objections, Celanese denies the request as stated.

REQUEST FOR ADMISSION NO. 469

Admit that Celanese did not have an x-ray program for pneumoconiosis screening while Plaintiff was working at the site.

RESPONSE:

Celanese objects to this request on the grounds that it is vague and ambiguous in that the term "x-ray program" is undefined. Celanese further objects to this request on the grounds that it seeks information that is irrelevant and not reasonable calculated to lead

to the discovery of admissible evidence.

Subject to and without waiving the foregoing objections, Celanese denies the request as stated.

REQUEST FOR ADMISSION NO. 470

Admit that Celanese had no program to prevent employees from being exposed to pneumoconiosis causing dusts in 1959.

RESPONSE:

Celanese objects to this request as overly broad in that it seeks information outside the time period at issue in this litigation and it is not limited to the plant at issue.

REQUEST FOR ADMISSION NO. 471

Admit that Celanese had no program to prevent employees from being exposed to pneumoconiosis causing dusts in 1960.

RESPONSE:

Celanese objects to this request as overly broad in that it seeks information outside the time period at issue in this litigation and it is not limited to the plant at issue.

REQUEST FOR ADMISSION NO. 472

Admit that Celanese had no program to prevent employees from being exposed to pneumoconiosis causing dusts in 1961.

RESPONSE:

Celanese objects to this request on the grounds that it is vague, ambiguous, and overly broad in that it is not properly limited to the time period and/or plant at issue. Celanese further objects to this request on the grounds that it seeks information that is irrelevant and not reasonable calculated to lead to the discovery of admissible evidence.

Subject to and without waiving the foregoing objections, Celanese denies the request as stated.

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REQUEST FOR ADMISSION NO. 473

Admit that Celanese had no program to prevent employees from being exposed to pneumoconiosis causing dusts in 1962.

RESPONSE:

Celanese objects to this request on the grounds that it is vague, ambiguous, and overly broad in that it is not properly limited to the time period and/or plant at issue. Celanese further objects to this request on the grounds that it seeks information that is irrelevant and not reasonable calculated to lead to the discovery of admissible evidence.

Subject to and without waiving the foregoing objections, Celanese denies the request as stated.

REQUEST FOR ADMISSION NO. 474

Admit that Celanese had no program to prevent employees from being exposed to pneumoconiosis causing dusts in 1963.

RESPONSE:

Celanese objects to this request on the grounds that it is vague, ambiguous, and overly broad in that it is not properly limited to the time period and/or plant at issue. Celanese further objects to this request on the grounds that it seeks information that is irrelevant and not reasonable calculated to lead to the discovery of admissible evidence.

Subject to and without waiving the foregoing objections, Celanese denies the request as stated.

REQUEST FOR ADMISSION NO. 475

Admit that Celanese had no program to prevent employees from being exposed to pneumoconiosis causing dusts in 1964.

RESPONSE:

Célanese objects to this request on the grounds that it is vague, ambiguous, and overly

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broad in that it is not properly limited to the time period and/or plant at issue. Celanese further objects to this request on the grounds that it seeks information that is irrelevant and not reasonable calculated to lead to the discovery of admissible evidence.

Subject to and without waiving the foregoing objections, Celanese denies the request as stated.

REQUEST FOR ADMISSION NO. 476

Admit that Celanese had no program to prevent employees from being exposed to pneumoconiosis causing dusts in 1965.

RESPONSE:

Celanese objects to this request on the grounds that it is vague, ambiguous, and overly broad in that it is not properly limited to the time period and/or plant at issue. Celanese further objects to this request on the grounds that it seeks information that is irrelevant and not reasonable calculated to lead to the discovery of admissible evidence.

Subject to and without waiving the foregoing objections, Celanese denies the request as stated.

REQUEST FOR ADMISSION NO. 477

Admit that Celanese had no program to prevent employees from being exposed to pneumoconiosis causing dusts in 1966.

RESPONSE:

Celanese objects to this request on the grounds that it is vague, ambiguous, and overly broad in that it is not properly limited to the time period and/or plant at issue. Celanese further objects to this request on the grounds that it seeks information that is irrelevant and not reasonable calculated to lead to the discovery of admissible evidence.

Subject to and without waiving the foregoing objections, Celanese denies the request as stated.

REQUEST FOR ADMISSION NO. 478

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Admit that Celanese had no program to prevent employees from being exposed to pneumoconiosis causing dusts in 1967.

RESPONSE:

Celanese objects to this request on the grounds that it is vague, ambiguous, and overly broad in that it is not properly limited to the time period and/or plant at issue. Celanese further objects to this request on the grounds that it seeks information that is irrelevant and not reasonable calculated to lead to the discovery of admissible evidence.

Subject to and without waiving the foregoing objections, Celanese denies the request as stated.

REQUEST FOR ADMISSION NO. 479

Admit that Celanese had no program to prevent employees from being exposed to pneumoconiosis causing dusts in 1968.

RESPONSE:

Celanese objects to this request on the grounds that it is vague, ambiguous, and overly broad in that it is not properly limited to the time period and/or plant at issue. Celanese further objects to this request on the grounds that it seeks information that is irrelevant and not reasonable calculated to lead to the discovery of admissible evidence.

Subject to and without waiving the foregoing objections, Celanese denies the request as stated.

REQUEST FOR ADMISSION NO. 480

Admit that Celanese had no program to prevent employees from being exposed to pneumoconiosis causing dusts in 1969.

RESPONSE:

Celanese objects to this request on the grounds that it is vague, ambiguous, and overly broad in that it is not properly limited to the time period and/or plant at issue. Celanese

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further objects to this request on the grounds that it seeks information that is irrelevant and not reasonable calculated to lead to the discovery of admissible evidence.

Subject to and without waiving the foregoing objections, Celanese denies the request as stated.

REQUEST FOR ADMISSION NO. 481

Admit that Celanese had no program to prevent employees from being exposed to pneumoconiosis causing dusts in 1970.

RESPONSE:

Celanese objects to this request on the grounds that it is vague, ambiguous, and overly broad in that it is not properly limited to the time period and/or plant at issue. Celanese further objects to this request on the grounds that it seeks information that is irrelevant and not reasonable calculated to lead to the discovery of admissible evidence.

Subject to and without waiving the foregoing objections, Celanese denies the request as stated.

REQUEST FOR ADMISSION NO. 482

Admit that Celanese had no program to prevent employees from being exposed to pneumoconiosis causing dusts in 1971.

RESPONSE:

Celanese objects to this request on the grounds that it is vague, ambiguous, and overly broad in that it is not properly limited to the time period and/or plant at issue. Celanese further objects to this request on the grounds that it seeks information that is irrelevant and not reasonable calculated to lead to the discovery of admissible evidence.

Subject to and without waiving the foregoing objections, Celanese denies the request as stated.

REQUEST FOR ADMISSION NO. 483

Admit that Celanese had no program to prevent employees from being exposed to

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pneumoconiosis causing dusts in 1972.

RESPONSE:

Celanese objects to this request as overly broad in that it is not properly limited to the time period and/or plant at issue in this case. Celanese further objects to this request because it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

REQUEST FOR ADMISSION NO. 484

Admit that Celanese did not have any program to prevent employees of independent contractors from being exposed to pneumoconiosis causing dusts in 1959.

RESPONSE:

Celanese objects to this request as vague, ambiguous and overly broad in that it is not properly limited to the time period and/or plant at issue in this case. Celanese further objects to this request because it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

REQUEST FOR ADMISSION NO. 485

Admit that Celanese did not have any program to prevent employees of independent contractors from being exposed to pneumoconiosis causing dusts in 1960.

RESPONSE:

Celanese objects to this request as vague, ambiguous and overly broad in that it is not properly limited to the time period and/or plant at issue in this case. Celanese further objects to this request because it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

REQUEST FOR ADMISSION NO. 486

Admit that Celanese did not have any program to prevent employees of independent contractors from being exposed to pneumoconiosis causing dusts in 1961.

RESPONSE:

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See responses to Request for Admission Nos. 70 - 80, 112 - 124, and 126 - 137.

REQUEST FOR ADMISSION NO. 487

Admit that Celanese did not have any program to prevent employees of independent contractors from being exposed to pneumoconiosis causing dusts in 1962.

RESPONSE:

See responses to Request for Admission Nos. 70 - 80, 112 - 124, and 126 - 137.

REQUEST FOR ADMISSION NO. 488

Admit that Celanese did not have any program to prevent employees of independent contractors from being exposed to pneumoconiosis causing dusts in 1963.

RESPONSE:

See responses to Request for Admission Nos. 70 - 80, 112 - 124, and 126 - 137.

REQUEST FOR ADMISSION NO. 489

Admit that Celanese did not have any program to prevent employees of independent contractors from being exposed to pneumoconiosis causing dusts in 1964.

RESPONSE:

See responses to Request for Admission Nos. 70 - 80, 112 - 124, and 126 - 137.

REQUEST FOR ADMISSION NO. 490

Admit that Celanese did not have any program to prevent employees of independent contractors from being exposed to pneumoconiosis causing dusts in 1965.

RESPONSE:

See responses to Request for Admission Nos. 70 - 80, 112 - 124, and 126 - 137.

REQUEST FOR ADMISSION NO. 491

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Admit that Celanese did not have any program to prevent employees of independent contractors from being exposed to pneumoconiosis causing dusts in 1966.

RESPONSE:

See responses to Request for Admission Nos. 70 - 80, 112 - 124, and 126 - 137.

REQUEST FOR ADMISSION NO. 492

Admit that Celanese did not have any program to prevent employees of independent contractors from being exposed to pneumoconiosis causing dusts in 1967.

RESPONSE:

See responses to Request for Admission Nos. 70 - 80, 112 - 124, and 126 - 137.

REQUEST FOR ADMISSION NO. 493

Admit that Celanese did not have any program to prevent employees of independent contractors from being exposed to pneumoconiosis causing dusts in 1968.

RESPONSE:

See responses to Request for Admission Nos. 70 - 80, 112 - 124, and 126 - 137.

REQUEST FOR ADMISSION NO. 494

Admit that Celanese did not have any program to prevent employees of independent contractors from being exposed to pneumoconiosis causing dusts in 1969.

RESPONSE:

See responses to Request for Admission Nos. 70 - 80, 112 - 124, and 126 - 137.

REQUEST FOR ADMISSION NO. 495

Admit that Celanese did not have any program to prevent employees of independent contractors from being exposed to pneumoconiosis causing dusts in 1970.

RESPONSE:

See responses to Request for Admission Nos. 70 - 80, 112 - 124, and 126 - 137.

REQUEST FOR ADMISSION NO. 496

Admit that Celanese did not have any program to prevent employees of independent contractors from being exposed to pneumoconiosis causing dusts in 1971.

RESPONSE:

See responses to Request for Admission Nos. 70 - 80, 112 - 124, and 126 - 137.

REQUEST FOR ADMISSION NO. 497

Admit that Celanese did not have any program to prevent employees of independent contractors from being exposed to pneumoconiosis causing dusts in 1972.

RESPONSE:

Celanese objects to this request as vague, ambiguous and overly broad in that it is not properly limited to the time period and/or plant at issue in this case. Celanese further objects to this request because it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

REQUEST FOR ADMISSION NO. 498

Admit that Celanese provided plans to its Bishop facility construction contractor in 1959.

RESPONSE:

Celanese objects to this request as vague, ambiguous and overly broad in that it is not properly limited to the time period and/or plant at issue in this case. Celanese further objects to this request because it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

REQUEST FOR ADMISSION NO. 499

Admit that Celanese provided plans to its Bishop facility construction contractor in 1960.

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RESPONSE:

Celanese objects to this request as vague, ambiguous and overly broad in that it is not properly limited to the time period and/or plant at issue in this case. Celanese further objects to this request because it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

REQUEST FOR ADMISSION NO. 500

Admit that Celanese provided plans to its Bishop facility construction contractor in 1961.

RESPONSE:

Celanese objects to this request on the grounds that it is vague and ambiguous in that the term "plan" is undefined. Celanese further objects to this request on the grounds that it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving the foregoing objections, Celanese after reasonable inquiry can neither admit or deny that the construction and/or maintenance work it hired plaintiff's employer Arthur Brothers to do during the stated period required it to provide Arthur Brothers with plans, specifications or drawings, or that plaintiff performed any work that might have involved such materials.

REQUEST FOR ADMISSION NO. 501

Admit that Celanese provided plans to its Bishop facility construction contractor in 1962.

RESPONSE:

Celanese objects to this request on the grounds that it is vague and ambiguous in that the term "plan" is undefined. Celanese further objects to this request on the grounds that it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving the foregoing objections, Celanese after reasonable inquiry can neither admit or deny that the construction and/or maintenance work it hired plaintiff's employer Arthur Brothers to do during the stated period required it to provide

Arthur Brothers with plans, specifications or drawings, or that plaintiff performed any work that might have involved such materials.

REQUEST FOR ADMISSION NO. 502

Admit that Celanese provided plans to its Bishop facility construction contractor in 1963.

RESPONSE:

Celanese objects to this request on the grounds that it is vague and ambiguous in that the term "plan" is undefined. Celanese further objects to this request on the grounds that it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving the foregoing objections, Celanese after reasonable inquiry can neither admit or deny that the construction and/or maintenance work it hired plaintiff's employer Arthur Brothers to do during the stated period required it to provide Arthur Brothers with plans, specifications or drawings, or that plaintiff performed any work that might have involved such materials.

REQUEST FOR ADMISSION NO. 503

Admit that Celanese provided plans to its Bishop facility construction contractor in 1964.

RESPONSE:

Celanese objects to this request on the grounds that it is vague and ambiguous in that the term "plan" is undefined. Celanese further objects to this request on the grounds that it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving the foregoing objections, Celanese after reasonable inquiry can neither admit or deny that the construction and/or maintenance work it hired plaintiff's employer Arthur Brothers to do during the stated period required it to provide Arthur Brothers with plans, specifications or drawings, or that plaintiff performed any work that might have involved such materials.

REQUEST FOR ADMISSION NO. 504

Admit that Celanese provided plans to its Bishop facility construction contractor in 1965.

RESPONSE:

Celanese objects to this request on the grounds that it is vague and ambiguous in that the term "plan" is undefined. Celanese further objects to this request on the grounds that it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving the foregoing objections, Celanese after reasonable inquiry can neither admit or deny that the construction and/or maintenance work it hired plaintiff's employer Arthur Brothers to do during the stated period required it to provide Arthur Brothers with plans, specifications or drawings, or that plaintiff performed any work that might have involved such materials.

REQUEST FOR ADMISSION NO. 505

Admit that Celanese provided plans to its Bishop facility construction contractor in 1966.

RESPONSE:

Celanese objects to this request on the grounds that it is vague and ambiguous in that the term "plan" is undefined. Celanese further objects to this request on the grounds that it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving the foregoing objections, Celanese after reasonable inquiry can neither admit or deny that the construction and/or maintenance work it hired plaintiff's employer Arthur Brothers to do during the stated period required it to provide Arthur Brothers with plans, specifications or drawings, or that plaintiff performed any work that might have involved such materials.

REQUEST FOR ADMISSION NO. 506

Admit that Celanese provided plans to its Bishop facility construction contractor in 1967.

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RESPONSE:

Celanese objects to this request on the grounds that it is vague and ambiguous in that the term "plan" is undefined. Celanese further objects to this request on the grounds that it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving the foregoing objections, Celanese after reasonable inquiry can neither admit or deny that the construction and/or maintenance work it hired plaintiff's employer Arthur Brothers to do during the stated period required it to provide Arthur Brothers with plans, specifications or drawings, or that plaintiff performed any work that might have involved such materials.

REQUEST FOR ADMISSION NO. 507

Admit that Celanese provided plans to its Bishop facility construction contractor in 1968.

RESPONSE:

Celanese objects to this request on the grounds that it is vague and ambiguous in that the term "plan" is undefined. Celanese further objects to this request on the grounds that it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving the foregoing objections, Celanese after reasonable inquiry can neither admit or deny that the construction and/or maintenance work it hired plaintiff's employer Arthur Brothers to do during the stated period required it to provide Arthur Brothers with plans, specifications or drawings, or that plaintiff performed any work that might have involved such materials.

REQUEST FOR ADMISSION NO. 508

Admit that Celanese provided plans to its Bishop facility construction contractor in 1969.

RESPONSE:

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Celanese objects to this request on the grounds that it is vague and ambiguous in that the term "plan" is undefined. Celanese further objects to this request on the grounds that it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving the foregoing objections, Celanese after reasonable inquiry can neither admit or deny that the construction and/or maintenance work it hired plaintiff's employer Arthur Brothers to do during the stated period required it to provide Arthur Brothers with plans, specifications or drawings, or that plaintiff performed any work that might have involved such materials.

REQUEST FOR ADMISSION NO. 509

Admit that Celanese provided plans to its Bishop facility construction contractor in 1970.

RESPONSE:

Celanese objects to this request on the grounds that it is vague and ambiguous in that the term "plan" is undefined. Celanese further objects to this request on the grounds that it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving the foregoing objections, Celanese after reasonable inquiry can neither admit or deny that the construction and/or maintenance work it hired plaintiff's employer Arthur Brothers to do during the stated period required it to provide Arthur Brothers with plans, specifications or drawings, or that plaintiff performed any work that might have involved such materials.

REQUEST FOR ADMISSION NO. 510

Admit that Celanese provided plans to its Bishop facility construction contractor in 1971.

RESPONSE:

Celanese objects to this request on the grounds that it is vague and ambiguous in that

the term "plan" is undefined. Celanese further objects to this request on the grounds that it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving the foregoing objections, Celanese after reasonable inquiry can neither admit or deny that the construction and/or maintenance work it hired plaintiff's employer Arthur Brothers to do during the stated period required it to provide Arthur Brothers with plans, specifications or drawings, or that plaintiff performed any work that might have involved such materials.

REQUEST FOR ADMISSION NO. 511

Admit that Celanese provided plans to its Bishop facility construction contractor in 1972.

RESPONSE:

Celanese objects to this request as vague and ambiguous in that the term "plan" is undefined. Celanese also objects to this request as overly broad in that it is not properly limited to the time period at issue in this case. Celanese further objects to this request because it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

REQUEST FOR ADMISSION NO. 512

Admit that Celanese provided specifications to its Bishop facility construction contractor in 1959.

RESPONSE:

Celanese objects to this request as vague and ambiguous in that the term "plan" is undefined. Celanese also objects to this request as overly broad in that it is not properly limited to the time period at issue in this case. Celanese further objects to this request because it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

REQUEST FOR ADMISSION NO. 513

Admit that Celanese provided specifications to its Bishop facility construction contractor in 1960.

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RESPONSE:

Celanese objects to this request as vague and ambiguous in that the term "plan" is undefined. Celanese also objects to this request as overly broad in that it is not properly limited to the time period at issue in this case. Celanese further objects to this request because it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

REQUEST FOR ADMISSION NO. 514

Admit that Celanese provided specifications to its Bishop facility construction contractor in 1961.

RESPONSE:

Celanese objects to this request on the grounds that it is vague and ambiguous. Celanese further objects to this request on the grounds that it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving the foregoing objections, Celanese after reasonable inquiry can neither admit or deny that the construction and/or maintenance work it hired plaintiff's employer Arthur Brothers to do during the stated period required it to provide Arthur Brothers with plans, specifications or drawings, or that plaintiff performed any work that might have involved such materials.

REQUEST FOR ADMISSION NO. 515

Admit that Celanese provided specifications to its Bishop facility construction contractor in 1962.

RESPONSE:

Celanese objects to this request on the grounds that it is vague and ambiguous. Celanese further objects to this request on the grounds that it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving the foregoing objections, Celanese after reasonable

inquiry can neither admit or deny that the construction and/or maintenance work it hired plaintiff's employer Arthur Brothers to do during the stated period required it to provide Arthur Brothers with plans, specifications or drawings, or that plaintiff performed any work that might have involved such materials.

REQUEST FOR ADMISSION NO. 516

Admit that Celanese provided specifications to its Bishop facility construction contractor in 1963.

RESPONSE:

Celanese objects to this request on the grounds that it is vague and ambiguous. Celanese further objects to this request on the grounds that it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving the foregoing objections, Celanese after reasonable inquiry can neither admit or deny that the construction and/or maintenance work it hired plaintiff's employer Arthur Brothers to do during the stated period required it to provide Arthur Brothers with plans, specifications or drawings, or that plaintiff performed any work that might have involved such materials.

REQUEST FOR ADMISSION NO. 517

Admit that Celanese provided specifications to its Bishop facility construction contractor in 1964.

RESPONSE:

Celanese objects to this request on the grounds that it is vague and ambiguous. Celanese further objects to this request on the grounds that it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving the foregoing objections, Celanese after reasonable inquiry can neither admit or deny that the construction and/or maintenance work it hired plaintiff's employer Arthur Brothers to do during the stated period required it to provide Arthur Brothers with plans, specifications or drawings, or that plaintiff performed any work that might have involved such materials.

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REQUEST FOR ADMISSION NO. 518

Admit that Celanese provided specifications to its Bishop facility construction contractor in 1965.

RESPONSE:

Celanese objects to this request on the grounds that it is vague and ambiguous. Celanese further objects to this request on the grounds that it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving the foregoing objections, Celanese after reasonable inquiry can neither admit or deny that the construction and/or maintenance work it hired plaintiff's employer Arthur Brothers to do during the stated period required it to provide Arthur Brothers with plans, specifications or drawings, or that plaintiff performed any work that might have involved such materials.

REQUEST FOR ADMISSION NO. 519

Admit that Celanese provided specifications to its Bishop facility construction contractor in 1966.

RESPONSE:

Celanese objects to this request on the grounds that it is vague and ambiguous. Celanese further objects to this request on the grounds that it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving the foregoing objections, Celanese after reasonable inquiry can neither admit or deny that the construction and/or maintenance work it hired plaintiff's employer Arthur Brothers to do during the stated period required it to provide Arthur Brothers with plans, specifications or drawings, or that plaintiff performed any work that might have involved such materials.

REQUEST FOR ADMISSION NO. 520

Admit that Celanese provided specifications to its Bishop facility construction contractor

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in 1967.

RESPONSE:

Celanese objects to this request on the grounds that it is vague and ambiguous. Celanese further objects to this request on the grounds that it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving the foregoing objections, Celanese after reasonable inquiry can neither admit or deny that the construction and/or maintenance work it hired plaintiff's employer Arthur Brothers to do during the stated period required it to provide Arthur Brothers with plans, specifications or drawings, or that plaintiff performed any work that might have involved such materials.

REQUEST FOR ADMISSION NO. 521

Admit that Celanese provided specifications to its Bishop facility construction contractor in 1968.

RESPONSE:

Celanese objects to this request on the grounds that it is vague and ambiguous. Celanese further objects to this request on the grounds that it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving the foregoing objections, Celanese after reasonable inquiry can neither admit or deny that the construction and/or maintenance work it hired plaintiff's employer Arthur Brothers to do during the stated period required it to provide Arthur Brothers with plans, specifications or drawings, or that plaintiff performed any work that might have involved such materials.

REQUEST FOR ADMISSION NO. 522

Admit that Celanese provided specifications to its Bishop facility construction contractor in 1969.

RESPONSE:

Celanese Ltd.'s Responses to Plaintiff
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Celanese objects to this request on the grounds that it is vague and ambiguous. Celanese further objects to this request on the grounds that it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving the foregoing objections, Celanese after reasonable inquiry can neither admit or deny that the construction and/or maintenance work it hired plaintiff's employer Arthur Brothers to do during the stated period required it to provide Arthur Brothers with plans, specifications or drawings, or that plaintiff performed any work that might have involved such materials.

REQUEST FOR ADMISSION NO. 523

Admit that Celanese provided specifications to its Bishop facility construction contractor in 1970.

RESPONSE:

Celanese objects to this request on the grounds that it is vague and ambiguous. Celanese further objects to this request on the grounds that it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving the foregoing objections, Celanese after reasonable inquiry can neither admit or deny that the construction and/or maintenance work it hired plaintiff's employer Arthur Brothers to do during the stated period required it to provide Arthur Brothers with plans, specifications or drawings, or that plaintiff performed any work that might have involved such materials.

REQUEST FOR ADMISSION NO. 524

Admit that Celanese provided specifications to its Bishop facility construction contractor in 1971.

RESPONSE:

Celanese objects to this request on the grounds that it is vague and ambiguous. Celanese further objects to this request on the grounds that it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

Celanese Ltd.'s Responses to Plaintiff
Fidencio Sanchez's Second Set of Requests
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for Production to Defendant Celanese Ltd.

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Subject to and without waiving the foregoing objections, Celanese after reasonable inquiry can neither admit or deny that the construction and/or maintenance work it hired plaintiff's employer Arthur Brothers to do during the stated period required it to provide Arthur Brothers with plans, specifications or drawings, or that plaintiff performed any work that might have involved such materials.

REQUEST FOR ADMISSION NO. 525

Admit that Celanese provided specifications to its Bishop facility construction contractor in 1972.

RESPONSE:

Celanese objects to this request as vague, ambiguous and overly broad in that it is not properly limited to the time period at issue in this case. Celanese further objects to this request because it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

REQUEST FOR ADMISSION NO. 526

Admit that Celanese provided drawings to its Bishop facility construction contractor in 1959.

RESPONSE:

Celanese objects to this request as vague, ambiguous and overly broad in that it is not properly limited to the time period at issue in this case. Celanese further objects to this request because it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

REQUEST FOR ADMISSION NO. 527

Admit that Celanese provided drawings to its Bishop facility construction contractor in 1960.

RESPONSE:

Celanese objects to this request as vague, ambiguous and overly broad in that it is not properly limited to the time period at issue in this case. Celanese further objects to this

request because it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

REQUEST FOR ADMISSION NO. 528

Admit that Celanese provided drawings to its Bishop facility construction contractor in 1961.

RESPONSE:

Celanese objects to this request on the grounds that it is vague and ambiguous. in that the term "drawings" is undefined. Celanese further objects to this request on the grounds that it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving the foregoing objections, Celanese after reasonable inquiry can neither admit or deny that the construction and/or maintenance work it hired plaintiff's employer Arthur Brothers to do during the stated period required it to provide Arthur Brothers with plans, specifications or drawings, or that plaintiff performed any work that might have involved such materials.

REQUEST FOR ADMISSION NO. 529

Admit that Celanese provided drawings to its Bishop facility construction contractor in 1962.

RESPONSE:

Celanese objects to this request on the grounds that it is vague and ambiguous. in that the term "drawings" is undefined. Celanese further objects to this request on the grounds that it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving the foregoing objections, Celanese after reasonable inquiry can neither admit or deny that the construction and/or maintenance work it hired plaintiff's employer Arthur Brothers to do during the stated period required it to provide Arthur Brothers with plans, specifications or drawings, or that plaintiff performed any work that might have involved such materials.

Celanese Ltd.'s Responses to Plaintiff
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REQUEST FOR ADMISSION NO. 530

Admit that Celanese provided drawings to its Bishop facility construction contractor in 1963.

RESPONSE:

Celanese objects to this request on the grounds that it is vague and ambiguous. in that the term "drawings" is undefined. Celanese further objects to this request on the grounds that it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving the foregoing objections, Celanese after reasonable inquiry can neither admit or deny that the construction and/or maintenance work it hired plaintiff's employer Arthur Brothers to do during the stated period required it to provide Arthur Brothers with plans, specifications or drawings, or that plaintiff performed any work that might have involved such materials.

REQUEST FOR ADMISSION NO. 531

Admit that Celanese provided drawings to its Bishop facility construction contractor in 1964.

RESPONSE:

Celanese objects to this request on the grounds that it is vague and ambiguous. in that the term "drawings" is undefined. Celanese further objects to this request on the grounds that it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving the foregoing objections, Celanese after reasonable inquiry can neither admit or deny that the construction and/or maintenance work it hired plaintiff's employer Arthur Brothers to do during the stated period required it to provide Arthur Brothers with plans, specifications or drawings, or that plaintiff performed any work that might have involved such materials.

REQUEST FOR ADMISSION NO. 532

Celanese Ltd.'s Responses to Plaintiff
Fidencio Sanchez's Second Set of Requests
for Admission and Third Set of Requests
for Production to Defendant Celanese Ltd.

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Admit that Celanese provided drawings to its Bishop facility construction contractor in 1965.

RESPONSE:

Celanese objects to this request on the grounds that it is vague and ambiguous. in that the term "drawings" is undefined. Celanese further objects to this request on the grounds that it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving the foregoing objections, Celanese after reasonable inquiry can neither admit or deny that the construction and/or maintenance work it hired plaintiff's employer Arthur Brothers to do during the stated period required it to provide Arthur Brothers with plans, specifications or drawings, or that plaintiff performed any work that might have involved such materials.

REQUEST FOR ADMISSION NO. 533

Admit that Celanese provided drawings to its Bishop facility construction contractor in 1966.

RESPONSE:

Celanese objects to this request on the grounds that it is vague and ambiguous. in that the term "drawings" is undefined. Celanese further objects to this request on the grounds that it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving the foregoing objections, Celanese after reasonable inquiry can neither admit or deny that the construction and/or maintenance work it hired plaintiff's employer Arthur Brothers to do during the stated period required it to provide Arthur Brothers with plans, specifications or drawings, or that plaintiff performed any work that might have involved such materials.

REQUEST FOR ADMISSION NO. 534

Admit that Celanese provided drawings to its Bishop facility construction contractor in 1967.

RESPONSE:

Celanese Ltd.'s Responses to Plaintiff
Fidencio Sanchez's Second Set of Requests
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Celanese objects to this request on the grounds that it is vague and ambiguous. in that the term "drawings" is undefined. Celanese further objects to this request on the grounds that it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving the foregoing objections, Celanese after reasonable inquiry can neither admit or deny that the construction and/or maintenance work it hired plaintiff's employer Arthur Brothers to do during the stated period required it to provide Arthur Brothers with plans, specifications or drawings, or that plaintiff performed any work that might have involved such materials.

REQUEST FOR ADMISSION NO. 535

Admit that Celanese provided drawings to its Bishop facility construction contractor in 1968.

RESPONSE:

Celanese objects to this request on the grounds that it is vague and ambiguous. in that the term "drawings" is undefined. Celanese further objects to this request on the grounds that it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving the foregoing objections, Celanese after reasonable inquiry can neither admit or deny that the construction and/or maintenance work it hired plaintiff's employer Arthur Brothers to do during the stated period required it to provide Arthur Brothers with plans, specifications or drawings, or that plaintiff performed any work that might have involved such materials.

REQUEST FOR ADMISSION NO. 536

Admit that Celanese provided drawings to its Bishop facility construction contractor in 1969.

RESPONSE:

Celanese objects to this request on the grounds that it is vague and ambiguous. in that the term "drawings" is undefined. Celanese further objects to this request on the

grounds that it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving the foregoing objections, Celanese after reasonable inquiry can neither admit or deny that the construction and/or maintenance work it hired plaintiff's employer Arthur Brothers to do during the stated period required it to provide Arthur Brothers with plans, specifications or drawings, or that plaintiff performed any work that might have involved such materials.

REQUEST FOR ADMISSION NO. 537

Admit that Celanese provided drawings to its Bishop facility construction contractor in 1970.

RESPONSE:

Celanese objects to this request on the grounds that it is vague and ambiguous. in that the term "drawings" is undefined. Celanese further objects to this request on the grounds that it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving the foregoing objections, Celanese after reasonable inquiry can neither admit or deny that the construction and/or maintenance work it hired plaintiff's employer Arthur Brothers to do during the stated period required it to provide Arthur Brothers with plans, specifications or drawings, or that plaintiff performed any work that might have involved such materials.

REQUEST FOR ADMISSION NO. 538

Admit that Celanese provided drawings to its Bishop facility construction contractor in 1971.

RESPONSE:

Celanese objects to this request on the grounds that it is vague and ambiguous. in that the term "drawings" is undefined. Celanese further objects to this request on the grounds that it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving the foregoing objections, Celanese after reasonable

Celanese Ltd.'s Responses to Plaintiff
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inquiry can neither admit or deny that the construction and/or maintenance work it hired plaintiff's employer Arthur Brothers to do during the stated period required it to provide Arthur Brothers with plans, specifications or drawings, or that plaintiff performed any work that might have involved such materials.

REQUEST FOR ADMISSION NO. 539

Admit that Celanese provided drawings to its Bishop facility construction contractor in 1972.

RESPONSE:

Celanese objects to this request as vague, ambiguous and overly broad in that it is not properly limited to the time period at issue in this case. Celanese further objects to this request because it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

REQUEST FOR ADMISSION NO. 540

Admit that Celanese provided plans to its Bishop facility maintenance contractor in 1959.

RESPONSE:

Celanese objects to this request as vague, ambiguous and overly broad in that it is not properly limited to the time period at issue in this case. Celanese further objects to this request because it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

REQUEST FOR ADMISSION NO. 541

Admit that Celanese provided plans to its Bishop facility maintenance contractor in 1960.

RESPONSE:

Celanese objects to this request as vague, ambiguous and overly broad in that it is not properly limited to the time period at issue in this case. Celanese further objects to this request because it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

Celanese Ltd.'s Responses to Plaintiff
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REQUEST FOR ADMISSION NO. 542

Admit that Celanese provided plans to its Bishop facility maintenance contractor in 1961.

RESPONSE:

Celanese objects to this request on the grounds that it is vague and ambiguous. in that the term "plans" is undefined. Celanese further objects to this request on the grounds that it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving the foregoing objections, Celanese after reasonable inquiry can neither admit or deny that the construction and/or maintenance work it hired plaintiff's employer Arthur Brothers to do during the stated period required it to provide Arthur Brothers with plans, specifications or drawings, or that plaintiff performed any work that might have involved such materials.

REQUEST FOR ADMISSION NO. 543

Admit that Celanese provided plans to its Bishop facility maintenance contractor in 1962.

RESPONSE:

Celanese objects to this request on the grounds that it is vague and ambiguous. in that the term "plans" is undefined. Celanese further objects to this request on the grounds that it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving the foregoing objections, Celanese after reasonable inquiry can neither admit or deny that the construction and/or maintenance work it hired plaintiff's employer Arthur Brothers to do during the stated period required it to provide Arthur Brothers with plans, specifications or drawings, or that plaintiff performed any work that might have involved such materials.

REQUEST FOR ADMISSION NO. 544

Celanese Ltd.'s Responses to Plaintiff
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Admit that Celanese provided plans to its Bishop facility maintenance contractor in 1963.

RESPONSE:

Celanese objects to this request on the grounds that it is vague and ambiguous. in that the term "plans" is undefined. Celanese further objects to this request on the grounds that it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving the foregoing objections, Celanese after reasonable inquiry can neither admit or deny that the construction and/or maintenance work it hired plaintiff's employer Arthur Brothers to do during the stated period required it to provide Arthur Brothers with plans, specifications or drawings, or that plaintiff performed any work that might have involved such materials.

REQUEST FOR ADMISSION NO. 545

Celanese objects to this request on the grounds that it is vague and ambiguous. in that the term "plans" is undefined. Celanese further objects to this request on the grounds that it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving the foregoing objections, Celanese after reasonable inquiry can neither admit or deny that the construction and/or maintenance work it hired plaintiff's employer Arthur Brothers to do during the stated period required it to provide Arthur Brothers with plans, specifications or drawings, or that plaintiff performed any work that might have involved such materials.

RESPONSE:

Celanese objects to this request on the grounds that it is vague and ambiguous. in that the term "plans" is undefined. Celanese further objects to this request on the grounds that it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving the foregoing objections, Celanese after reasonable inquiry can neither admit or deny that the construction and/or maintenance work it hired plaintiff's employer Arthur Brothers to do during the stated period required it to provide Arthur Brothers with plans, specifications or drawings, or that plaintiff performed any

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work that might have involved such materials.

REQUEST FOR ADMISSION NO. 546

Admit that Celanese provided plans to its Bishop facility maintenance contractor in 1965.

RESPONSE:

Celanese objects to this request on the grounds that it is vague and ambiguous. in that the term "plans" is undefined. Celanese further objects to this request on the grounds that it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving the foregoing objections, Celanese after reasonable inquiry can neither admit or deny that the construction and/or maintenance work it hired plaintiff's employer Arthur Brothers to do during the stated period required it to provide Arthur Brothers with plans, specifications or drawings, or that plaintiff performed any work that might have involved such materials.

REQUEST FOR ADMISSION NO. 547

Admit that Celanese provided plans to its Bishop facility maintenance contractor in 1966.

RESPONSE:

Celanese objects to this request on the grounds that it is vague and ambiguous. in that the term "plans" is undefined. Celanese further objects to this request on the grounds that it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving the foregoing objections, Celanese after reasonable inquiry can neither admit or deny that the construction and/or maintenance work it hired plaintiff's employer Arthur Brothers to do during the stated period required it to provide Arthur Brothers with plans, specifications or drawings, or that plaintiff performed any work that might have involved such materials.

REQUEST FOR ADMISSION NO. 548

Celanese Ltd.'s Responses to Plaintiff
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Admit that Celanese provided plans to its Bishop facility maintenance contractor in 1967.

RESPONSE:

Celanese objects to this request on the grounds that it is vague and ambiguous. in that the term "plans" is undefined. Celanese further objects to this request on the grounds that it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving the foregoing objections, Celanese after reasonable inquiry can neither admit or deny that the construction and/or maintenance work it hired plaintiff's employer Arthur Brothers to do during the stated period required it to provide Arthur Brothers with plans, specifications or drawings, or that plaintiff performed any work that might have involved such materials.

REQUEST FOR ADMISSION NO. 549

Admit that Celanese provided plans to its Bishop facility maintenance contractor in 1968.

RESPONSE:

Celanese objects to this request on the grounds that it is vague and ambiguous. in that the term "plans" is undefined. Celanese further objects to this request on the grounds that it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving the foregoing objections, Celanese after reasonable inquiry can neither admit or deny that the construction and/or maintenance work it hired plaintiff's employer Arthur Brothers to do during the stated period required it to provide Arthur Brothers with plans, specifications or drawings, or that plaintiff performed any work that might have involved such materials.

REQUEST FOR ADMISSION NO. 550

Admit that Celanese provided plans to its Bishop facility maintenance contractor in 1969.

Celanese Ltd.'s Responses to Plaintiff
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RESPONSE:

Celanese objects to this request on the grounds that it is vague and ambiguous. in that the term "plans" is undefined. Celanese further objects to this request on the grounds that it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving the foregoing objections, Celanese after reasonable inquiry can neither admit or deny that the construction and/or maintenance work it hired plaintiff's employer Arthur Brothers to do during the stated period required it to provide Arthur Brothers with plans, specifications or drawings, or that plaintiff performed any work that might have involved such materials.

REQUEST FOR ADMISSION NO. 551

Admit that Celanese provided plans to its Bishop facility maintenance contractor in 1970.

RESPONSE:

Celanese objects to this request on the grounds that it is vague and ambiguous. in that the term "plans" is undefined. Celanese further objects to this request on the grounds that it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving the foregoing objections, Celanese after reasonable inquiry can neither admit or deny that the construction and/or maintenance work it hired plaintiff's employer Arthur Brothers to do during the stated period required it to provide Arthur Brothers with plans, specifications or drawings, or that plaintiff performed any work that might have involved such materials.

REQUEST FOR ADMISSION NO. 552

Admit that Celanese provided plans to its Bishop facility maintenance contractor in 1971.

RESPONSE:

Celanese objects to this request on the grounds that it is vague and ambiguous. in that

the term "plans" is undefined. Celanese further objects to this request on the grounds that it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving the foregoing objections, Celanese after reasonable inquiry can neither admit or deny that the construction and/or maintenance work it hired plaintiff's employer Arthur Brothers to do during the stated period required it to provide Arthur Brothers with plans, specifications or drawings, or that plaintiff performed any work that might have involved such materials.

REQUEST FOR ADMISSION NO. 553

Admit that Celanese provided plans to its Bishop facility maintenance contractor in 1972.

RESPONSE:

Celanese objects to this request as vague, ambiguous and overly broad in that it is not properly limited to the time period at issue in this case. Celanese further objects to this request because it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

REQUEST FOR ADMISSION NO. 554

Admit that Celanese provided specifications to its Bishop facility maintenance contractor in 1959.

RESPONSE:

Celanese objects to this request as vague, ambiguous and overly broad in that it is not properly limited to the time period at issue in this case. Celanese further objects to this request because it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

REQUEST FOR ADMISSION NO. 555

Admit that Celanese provided specifications to its Bishop facility maintenance contractor in 1960.

RESPONSE:

Celanese Ltd.'s Responses to Plaintiff
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Celanese objects to this request as vague, ambiguous and overly broad in that it is not properly limited to the time period at issue in this case. Celanese further objects to this request because it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

REQUEST FOR ADMISSION NO. 556

Admit that Celanese provided specifications to its Bishop facility maintenance contractor in 1961.

RESPONSE:

Celanese objects to this request on the grounds that it is vague and ambiguous. Celanese further objects to this request on the grounds that it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving the foregoing objections, Celanese after reasonable inquiry can neither admit or deny that the construction and/or maintenance work it hired plaintiff's employer Arthur Brothers to do during the stated period required it to provide Arthur Brothers with plans, specifications or drawings, or that plaintiff performed any work that might have involved such materials.

REQUEST FOR ADMISSION NO. 557

Admit that Celanese provided specifications to its Bishop facility maintenance contractor in 1962.

RESPONSE:

Celanese objects to this request on the grounds that it is vague and ambiguous. Celanese further objects to this request on the grounds that it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving the foregoing objections, Celanese after reasonable inquiry can neither admit or deny that the construction and/or maintenance work it hired plaintiff's employer Arthur Brothers to do during the stated period required it to provide Arthur Brothers with plans, specifications or drawings, or that plaintiff performed any

work that might have involved such materials.

REQUEST FOR ADMISSION NO. 558

Admit that Celanese provided specifications to its Bishop facility maintenance contractor in 1963.

RESPONSE:

Celanese objects to this request on the grounds that it is vague and ambiguous. Celanese further objects to this request on the grounds that it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving the foregoing objections, Celanese after reasonable inquiry can neither admit or deny that the construction and/or maintenance work it hired plaintiff's employer Arthur Brothers to do during the stated period required it to provide Arthur Brothers with plans, specifications or drawings, or that plaintiff performed any work that might have involved such materials.

REQUEST FOR ADMISSION NO. 559

Admit that Celanese provided specifications to its Bishop facility maintenance contractor in 1964.

RESPONSE:

Celanese objects to this request on the grounds that it is vague and ambiguous. Celanese further objects to this request on the grounds that it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving the foregoing objections, Celanese after reasonable inquiry can neither admit or deny that the construction and/or maintenance work it hired plaintiff's employer Arthur Brothers to do during the stated period required it to provide Arthur Brothers with plans, specifications or drawings, or that plaintiff performed any work that might have involved such materials.

REQUEST FOR ADMISSION NO. 560

Celanese Ltd.'s Responses to Plaintiff
Fidencio Sanchez's Second Set of Requests
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Admit that Celanese provided specifications to its Bishop facility maintenance contractor in 1965.

RESPONSE:

Celanese objects to this request on the grounds that it is vague and ambiguous. Celanese further objects to this request on the grounds that it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving the foregoing objections, Celanese after reasonable inquiry can neither admit or deny that the construction and/or maintenance work it hired plaintiff's employer Arthur Brothers to do during the stated period required it to provide Arthur Brothers with plans, specifications or drawings, or that plaintiff performed any work that might have involved such materials.

REQUEST FOR ADMISSION NO. 561

Admit that Celanese provided specifications to its Bishop facility maintenance contractor in 1966.

RESPONSE:

Celanese objects to this request on the grounds that it is vague and ambiguous. Celanese further objects to this request on the grounds that it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving the foregoing objections, Celanese after reasonable inquiry can neither admit or deny that the construction and/or maintenance work it hired plaintiff's employer Arthur Brothers to do during the stated period required it to provide Arthur Brothers with plans, specifications or drawings, or that plaintiff performed any work that might have involved such materials.

REQUEST FOR ADMISSION NO. 562

Admit that Celanese provided specifications to its Bishop facility maintenance contractor in 1967.

Celanese Ltd.'s Responses to Plaintiff
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RESPONSE:

Celanese objects to this request on the grounds that it is vague and ambiguous. Celanese further objects to this request on the grounds that it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving the foregoing objections, Celanese after reasonable inquiry can neither admit or deny that the construction and/or maintenance work it hired plaintiff's employer Arthur Brothers to do during the stated period required it to provide Arthur Brothers with plans, specifications or drawings, or that plaintiff performed any work that might have involved such materials.

REQUEST FOR ADMISSION NO. 563

Admit that Celanese provided specifications to its Bishop facility maintenance contractor in 1968.

RESPONSE:

Celanese objects to this request on the grounds that it is vague and ambiguous. Celanese further objects to this request on the grounds that it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving the foregoing objections, Celanese after reasonable inquiry can neither admit or deny that the construction and/or maintenance work it hired plaintiff's employer Arthur Brothers to do during the stated period required it to provide Arthur Brothers with plans, specifications or drawings, or that plaintiff performed any work that might have involved such materials.

REQUEST FOR ADMISSION NO. 564

Admit that Celanese provided specifications to its Bishop facility maintenance contractor in 1969.

RESPONSE:

Celanese objects to this request on the grounds that it is vague and ambiguous. Celanese further objects to this request on the grounds that it seeks information that is

neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving the foregoing objections, Celanese after reasonable inquiry can neither admit or deny that the construction and/or maintenance work it hired plaintiff's employer Arthur Brothers to do during the stated period required it to provide Arthur Brothers with plans, specifications or drawings, or that plaintiff performed any work that might have involved such materials.

REQUEST FOR ADMISSION NO. 565

Admit that Celanese provided specifications to its Bishop facility maintenance contractor in 1970.

RESPONSE:

Celanese objects to this request on the grounds that it is vague and ambiguous. Celanese further objects to this request on the grounds that it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving the foregoing objections, Celanese after reasonable inquiry can neither admit or deny that the construction and/or maintenance work it hired plaintiff's employer Arthur Brothers to do during the stated period required it to provide Arthur Brothers with plans, specifications or drawings, or that plaintiff performed any work that might have involved such materials.

REQUEST FOR ADMISSION NO. 566

Admit that Celanese provided specifications to its Bishop facility maintenance contractor in 1971.

RESPONSE:

Celanese objects to this request on the grounds that it is vague and ambiguous. Celanese further objects to this request on the grounds that it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving the foregoing objections, Celanese after reasonable

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inquiry can neither admit or deny that the construction and/or maintenance work it hired plaintiff's employer Arthur Brothers to do during the stated period required it to provide Arthur Brothers with plans, specifications or drawings, or that plaintiff performed any work that might have involved such materials.

REQUEST FOR ADMISSION NO. 567

Admit that Celanese provided specifications to its Bishop facility maintenance contractor in 1972.

RESPONSE:

Celanese objects to this request as vague, ambiguous and overly broad in that it is not properly limited to the time period at issue in this case. Celanese further objects to this request because it seeks information that is neither relevant, nor reasonably calculated to lead to the discovery of admissible evidence.

REQUEST FOR ADMISSION NO. 568

Admit that Celanese provided drawings to its Bishop facility maintenance contractor in 1959.

RESPONSE:

Celanese objects to this request as vague, ambiguous and overly broad in that it is not properly limited to the time period at issue in this case. Celanese further objects to this request because it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

REQUEST FOR ADMISSION NO. 569

Admit that Celanese provided drawings to its Bishop facility maintenance contractor in 1960.

RESPONSE:

Celanese objects to this request as vague, ambiguous and overly broad in that it is not properly limited to the time period at issue in this case. Celanese further objects to this request because it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

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REQUEST FOR ADMISSION NO. 570

Admit that Celanese provided drawings to its Bishop facility maintenance contractor in 1961.

RESPONSE:

Celanese objects to this request on the grounds ~~that~~ it is vague and ambiguous. in that the term "drawings" is undefined. Celanese further objects to this request on the grounds that it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving the foregoing objections, Celanese after reasonable inquiry can neither admit or deny that the construction and/or maintenance work it hired plaintiff's employer Arthur Brothers to do during the stated period required it to provide Arthur Brothers with plans, specifications or drawings, or that plaintiff performed any work that might have involved such materials.

REQUEST FOR ADMISSION NO. 571

Admit that Celanese provided drawings to its Bishop facility maintenance contractor in 1962.

RESPONSE:

Celanese objects to this request on the grounds that it is vague and ambiguous. in that the term "drawings" is undefined. Celanese further objects to this request on the grounds that it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving the foregoing objections, Celanese after reasonable inquiry can neither admit or deny that the construction and/or maintenance work it hired plaintiff's employer Arthur Brothers to do during the stated period required it to provide Arthur Brothers with plans, specifications or drawings, or that plaintiff performed any work that might have involved such materials.

REQUEST FOR ADMISSION NO. 572

Admit that Celanese provided drawings to its Bishop facility maintenance contractor in

Celanese Ltd.'s Responses to Plaintiff
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98102

1963.

RESPONSE:

Celanese objects to this request on the grounds that it is vague and ambiguous. in that the term "drawings" is undefined. Celanese further objects to this request on the grounds that it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving the foregoing objections, Celanese after reasonable inquiry can neither admit or deny that the construction and/or maintenance work it hired plaintiff's employer Arthur Brothers to do during the stated period required it to provide Arthur Brothers with plans, specifications or drawings, or that plaintiff performed any work that might have involved such materials.

REQUEST FOR ADMISSION NO. 573

Admit that Celanese provided drawings to its Bishop facility maintenance contractor in 1964.

RESPONSE:

Celanese objects to this request on the grounds that it is vague and ambiguous. in that the term "drawings" is undefined. Celanese further objects to this request on the grounds that it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving the foregoing objections, Celanese after reasonable inquiry can neither admit or deny that the construction and/or maintenance work it hired plaintiff's employer Arthur Brothers to do during the stated period required it to provide Arthur Brothers with plans, specifications or drawings, or that plaintiff performed any work that might have involved such materials.

REQUEST FOR ADMISSION NO. 574

Admit that Celanese provided drawings to its Bishop facility maintenance contractor in 1965.

RESPONSE:

Celanese Ltd.'s Responses to Plaintiff
Fidencio Sanchez's Second Set of Requests
for Admission and Third Set of Requests
for Production to Defendant Celanese Ltd.

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Celanese objects to this request on the grounds that it is vague and ambiguous. in that the term "drawings" is undefined. Celanese further objects to this request on the grounds that it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving the foregoing objections, Celanese after reasonable inquiry can neither admit or deny that the construction and/or maintenance work it hired plaintiff's employer Arthur Brothers to do during the stated period required it to provide Arthur Brothers with plans, specifications or drawings, or that plaintiff performed any work that might have involved such materials.

REQUEST FOR ADMISSION NO. 575

Admit that Celanese provided drawings to its Bishop facility maintenance contractor in 1966.

RESPONSE:

Celanese objects to this request on the grounds that it is vague and ambiguous. in that the term "drawings" is undefined. Celanese further objects to this request on the grounds that it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving the foregoing objections, Celanese after reasonable inquiry can neither admit or deny that the construction and/or maintenance work it hired plaintiff's employer Arthur Brothers to do during the stated period required it to provide Arthur Brothers with plans, specifications or drawings, or that plaintiff performed any work that might have involved such materials.

REQUEST FOR ADMISSION NO. 576

Admit that Celanese provided drawings to its Bishop facility maintenance contractor in 1967.

RESPONSE:

Celanese objects to this request on the grounds that it is vague and ambiguous. in that the term "drawings" is undefined. Celanese further objects to this request on the grounds that it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

Celanese Ltd.'s Responses to Plaintiff
Fidencio Sanchez's Second Set of Requests
for Admission and Third Set of Requests
for Production to Defendant Celanese Ltd.

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Subject to and without waiving the foregoing objections, Celanese after reasonable inquiry can neither admit or deny that the construction and/or maintenance work it hired plaintiff's employer Arthur Brothers to do during the stated period required it to provide Arthur Brothers with plans, specifications or drawings, or that plaintiff performed any work that might have involved such materials.

REQUEST FOR ADMISSION NO. 577

Admit that Celanese provided drawings to its Bishop facility maintenance contractor in 1968.

RESPONSE:

Celanese objects to this request on the grounds that it is vague and ambiguous. in that the term "drawings" is undefined. Celanese further objects to this request on the grounds that it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving the foregoing objections, Celanese after reasonable inquiry can neither admit or deny that the construction and/or maintenance work it hired plaintiff's employer Arthur Brothers to do during the stated period required it to provide Arthur Brothers with plans, specifications or drawings, or that plaintiff performed any work that might have involved such materials.

REQUEST FOR ADMISSION NO. 578

Admit that Celanese provided drawings to its Bishop facility maintenance contractor in 1969.

RESPONSE:

Celanese objects to this request on the grounds that it is vague and ambiguous. in that the term "drawings" is undefined. Celanese further objects to this request on the grounds that it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving the foregoing objections, Celanese after reasonable inquiry can neither admit or deny that the construction and/or maintenance work it hired plaintiff's employer Arthur Brothers to do during the stated period required it to provide

Arthur Brothers with plans, specifications or drawings, or that plaintiff performed any work that might have involved such materials.

REQUEST FOR ADMISSION NO. 579

Admit that Celanese provided drawings to its Bishop facility maintenance contractor in 1970.

RESPONSE:

Celanese objects to this request on the grounds that it is vague and ambiguous. in that the term "drawings" is undefined. Celanese further objects to this request on the grounds that it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving the foregoing objections, Celanese after reasonable inquiry can neither admit or deny that the construction and/or maintenance work it hired plaintiff's employer Arthur Brothers to do during the stated period required it to provide Arthur Brothers with plans, specifications or drawings, or that plaintiff performed any work that might have involved such materials.

REQUEST FOR ADMISSION NO. 580

Admit that Celanese provided drawings to its Bishop facility maintenance contractor in 1971.

RESPONSE:

Celanese objects to this request on the grounds that it is vague and ambiguous. in that the term "drawings" is undefined. Celanese further objects to this request on the grounds that it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving the foregoing objections, Celanese after reasonable inquiry can neither admit or deny that the construction and/or maintenance work it hired plaintiff's employer Arthur Brothers to do during the stated period required it to provide Arthur Brothers with plans, specifications or drawings, or that plaintiff performed any work that might have involved such materials.

REQUEST FOR ADMISSION NO. 581

Celanese Ltd.'s Responses to Plaintiff
Fidencio Sanchez's Second Set of Requests
for Admission and Third Set of Requests
for Production to Defendant Celanese Ltd.

98102

Admit that Celanese provided drawings to its Bishop facility maintenance contractor in 1972.

RESPONSE:

Celanese objects to this request as vague, ambiguous and overly broad in that it is not properly limited to the time period at issue in this case. Celanese further objects to this request because it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

REQUEST FOR ADMISSION NO. 582

Admit that Brown & Root was the primary construction contractor for the Bishop facility in 1959.

RESPONSE:

Celanese objects to this request as vague, ambiguous and overly broad in that it is not properly limited to the time period at issue in this case. Celanese further objects to this request because it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

REQUEST FOR ADMISSION NO. 583

Admit that Brown & Root was the primary construction contractor for the Bishop facility in 1960.

RESPONSE:

Celanese objects to this request as vague, ambiguous and overly broad in that it is not properly limited to the time period at issue in this case. Celanese further objects to this request because it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

REQUEST FOR ADMISSION NO. 584

Admit that Brown & Root was the primary construction contractor for the Bishop facility in 1961.

RESPONSE:

Celanese objects to this request because it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving the foregoing objections, Celanese admits that Brown & Root was the primary independent construction contractor to the extent capital improvement projects occurred during the stated period.

REQUEST FOR ADMISSION NO. 585

Admit that Brown & Root was the primary construction contractor for the Bishop facility in 1962.

RESPONSE:

Celanese objects to this request because it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving the foregoing objections, Celanese admits that Brown & Root was the primary independent construction contractor to the extent capital improvement projects occurred during the stated period.

REQUEST FOR ADMISSION NO. 586

Admit that Brown & Root was the primary construction contractor for the Bishop facility in 1963.

RESPONSE:

Celanese objects to this request because it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving the foregoing objections, Celanese admits that Brown & Root was the primary independent construction contractor to the extent capital improvement projects occurred during the stated period.

REQUEST FOR ADMISSION NO. 587

Admit that Brown & Root was the primary construction contractor for the Bishop facility

in 1964.

RESPONSE:

Celanese objects to this request because it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving the foregoing objections, Celanese admits that Brown & Root was the primary independent construction contractor to the extent capital improvement projects occurred during the stated period.

REQUEST FOR ADMISSION NO. 588

Admit that Brown & Root was the primary construction contractor for the Bishop facility in 1965.

RESPONSE:

Celanese objects to this request because it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving the foregoing objections, Celanese admits that Brown & Root was the primary independent construction contractor to the extent capital improvement projects occurred during the stated period.

REQUEST FOR ADMISSION NO. 589

Admit that Brown & Root was the primary construction contractor for the Bishop facility in 1966.

RESPONSE:

Celanese objects to this request because it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving the foregoing objections, Celanese admits that Brown & Root was the primary independent construction contractor to the extent capital improvement projects occurred during the stated period.

REQUEST FOR ADMISSION NO. 590

Celanese Ltd.'s Responses to Plaintiff
Fidencio Sanchez's Second Set of Requests
for Admission and Third Set of Requests
for Production to Defendant Celanese Ltd.

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Admit that Brown & Root was the primary construction contractor for the Bishop facility in 1967.

RESPONSE:

Celanese objects to this request because it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving the foregoing objections, Celanese admits that Brown & Root was the primary independent construction contractor to the extent capital improvement projects occurred during the stated period.

REQUEST FOR ADMISSION NO. 591

Admit that Brown & Root was the primary construction contractor for the Bishop facility in 1968.

RESPONSE:

Celanese objects to this request because it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving the foregoing objections, Celanese admits that Brown & Root was the primary independent construction contractor to the extent capital improvement projects occurred during the stated period.

REQUEST FOR ADMISSION NO. 592

Admit that Brown & Root was the primary construction contractor for the Bishop facility in 1969.

RESPONSE:

Celanese objects to this request because it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving the foregoing objections, Celanese admits that Brown & Root was the primary independent construction contractor to the extent capital improvement projects occurred during the stated period.

Celanese Ltd.'s Responses to Plaintiff
Fidencio Sanchez's Second Set of Requests
for Admission and Third Set of Requests
for Production to Defendant Celanese Ltd.

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REQUEST FOR ADMISSION NO. 593

Admit that Brown & Root was the primary construction contractor for the Bishop facility in 1970.

RESPONSE:

Celanese objects to this request because it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving the foregoing objections, Celanese admits that Brown & Root was the primary independent construction contractor to the extent capital improvement projects occurred during the stated period.

REQUEST FOR ADMISSION NO. 594

Admit that Brown & Root was the primary construction contractor for the Bishop facility in 1971.

RESPONSE:

Celanese objects to this request because it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving the foregoing objections, Celanese admits that Brown & Root was the primary independent construction contractor to the extent capital improvement projects occurred during the stated period.

REQUEST FOR ADMISSION NO. 595

Admit that Brown & Root was the primary construction contractor for the Bishop facility in 1972.

RESPONSE:

Celanese objects to this request as vague, ambiguous and overly broad in that it is not properly limited to the time period at issue in this case. Celanese further objects to this request because it seeks information that is neither relevant nor reasonably calculated

to lead to the discovery of admissible evidence.

REQUEST FOR ADMISSION NO. 596

Admit that ABI was the primary maintenance contractor for the Bishop facility in 1959.

RESPONSE:

Celanese objects to this request as vague, ambiguous and overly broad in that it is not properly limited to the time period at issue in this case. Celanese further objects to this request because it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

REQUEST FOR ADMISSION NO. 597

Admit that ABI was the primary maintenance contractor for the Bishop facility in 1960.

RESPONSE:

Celanese objects to this request as vague, ambiguous and overly broad in that it is not properly limited to the time period at issue in this case. Celanese further objects to this request because it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

REQUEST FOR ADMISSION NO. 598

Admit that ABI was the primary maintenance contractor for the Bishop facility in 1961.

RESPONSE:

Celanese admits that Arthur Brothers was the primary independent maintenance contractor for the Bishop plant during the stated period.

REQUEST FOR ADMISSION NO. 599

Admit that ABI was the primary maintenance contractor for the Bishop facility in 1962.

RESPONSE:

Celanese Ltd.'s Responses to Plaintiff
Fidencio Sanchez's Second Set of Requests
for Admission and Third Set of Requests
for Production to Defendant Celanese Ltd.

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Celanese admits that Arthur Brothers was the primary independent maintenance contractor for the Bishop plant during the stated period.

REQUEST FOR ADMISSION NO. 600

Admit that ABI was the primary maintenance contractor for the Bishop facility in 1963.

RESPONSE:

Celanese admits that Arthur Brothers was the primary independent maintenance contractor for the Bishop plant during the stated period.

REQUEST FOR ADMISSION NO. 601

Admit that ABI was the primary maintenance contractor for the Bishop facility in 1964.

RESPONSE:

Celanese admits that Arthur Brothers was the primary independent maintenance contractor for the Bishop plant during the stated period.

REQUEST FOR ADMISSION NO. 602

Admit that ABI was the primary maintenance contractor for the Bishop facility in 1965.

RESPONSE:

Celanese admits that Arthur Brothers was the primary independent maintenance contractor for the Bishop plant during the stated period.

REQUEST FOR ADMISSION NO. 603

Admit that ABI was the primary maintenance contractor for the Bishop facility in 1966.

RESPONSE:

Celanese admits that Arthur Brothers was the primary independent maintenance contractor for the Bishop plant during the stated period.

REQUEST FOR ADMISSION NO. 604

Celanese Ltd.'s Responses to Plaintiff
Fidencio Sanchez's Second Set of Requests
for Admission and Third Set of Requests
for Production to Defendant Celanese Ltd.

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Admit that ABI was the primary maintenance contractor for the Bishop facility in 1967.

RESPONSE:

Celanese admits that Arthur Brothers was the primary independent maintenance contractor for the Bishop plant during the stated period.

REQUEST FOR ADMISSION NO. 605

Admit that ABI was the primary maintenance contractor for the Bishop facility in 1968.

RESPONSE:

Celanese admits that Arthur Brothers was the primary independent maintenance contractor for the Bishop plant during the stated period.

REQUEST FOR ADMISSION NO. 606

Admit that ABI was the primary maintenance contractor for the Bishop facility in 1969.

RESPONSE:

Celanese admits that Arthur Brothers was the primary independent maintenance contractor for the Bishop plant during the stated period.

REQUEST FOR ADMISSION NO. 607

Admit that ABI was the primary maintenance contractor for the Bishop facility in 1970.

RESPONSE:

Celanese admits that Arthur Brothers was the primary independent maintenance contractor for the Bishop plant during the stated period.

REQUEST FOR ADMISSION NO. 608

Admit that ABI was the primary maintenance contractor for the Bishop facility in 1971.

RESPONSE:

Celanese Ltd.'s Responses to Plaintiff
Fidencio Sanchez's Second Set of Requests
for Admission and Third Set of Requests
for Production to Defendant Celanese Ltd.

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Celanese admits that Arthur Brothers was the primary independent maintenance contractor for the Bishop plant during the stated period.

REQUEST FOR ADMISSION NO. 609

Admit that ABI was the primary maintenance contractor for the Bishop facility in 1972.

RESPONSE:

Celanese objects to this request as vague, ambiguous and overly broad in that it is not properly limited to the time period at issue in this case. Celanese further objects to this request because it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

REQUEST FOR ADMISSION NO. 610

Admit that Celanese employees purchased asbestos containing insulation materials that were installed by contractor employees in 1959.

RESPONSE:

Celanese objects to this request as vague, ambiguous and overly broad in that it is not properly limited to the time period and/or plant at issue in this case. Celanese further objects to this request because it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

REQUEST FOR ADMISSION NO. 611

Admit that Celanese employees purchased asbestos containing insulation materials that were installed by contractor employees in 1960.

RESPONSE:

Celanese objects to this request as vague, ambiguous and overly broad in that it is not properly limited to the time period and/or plant at issue in this case. Celanese further objects to this request because it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

REQUEST FOR ADMISSION NO. 612

Celanese Ltd.'s Responses to Plaintiff
Fidencio Sanchez's Second Set of Requests
for Admission and Third Set of Requests
for Production to Defendant Celanese Ltd.

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Admit that Celanese employees purchased asbestos containing insulation materials that were installed by contractor employees in 1961.

RESPONSE:

Celanese objects to this request as vague, ambiguous and overly broad in that it is not properly plant at issue in this case. Celanese also objects to this request on the grounds that it is overly broad and harassing in that it is ~~not~~ properly limited as to scope and it seeks information regarding contractors other than the independent contractor for whom plaintiff claims to have worked, Arthur Brother, Inc. Celanese further objects to this request because it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving the foregoing objections, Celanese on information and belief admits that it ultimately paid for insulation materials, gaskets and packings used by the independent contractors it hired, but believes such materials were generally selected, estimated and ordered by the independent contractors themselves.

REQUEST FOR ADMISSION NO. 613

Admit that Celanese employees purchased asbestos containing insulation materials that were installed by contractor employees in 1962.

RESPONSE:

Celanese objects to this request as vague, ambiguous and overly broad in that it is not properly plant at issue in this case. Celanese also objects to this request on the grounds that it is overly broad and harassing in that it is not properly limited as to scope and it seeks information regarding contractors other than the independent contractor for whom plaintiff claims to have worked, Arthur Brother, Inc. Celanese further objects to this request because it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving the foregoing objections, Celanese on information and belief admits that it ultimately paid for insulation materials, gaskets and packings used by the independent contractors it hired, but believes such materials were generally selected, estimated and ordered by the independent contractors themselves.

REQUEST FOR ADMISSION NO. 614

Admit that Celanese employees purchased asbestos containing insulation materials that were installed by contractor employees in 1963.

RESPONSE:

Celanese objects to this request as vague, ambiguous and overly broad in that it is not properly plant at issue in this case. Celanese also objects to this request on the grounds that it is overly broad and harassing in that it is not properly limited as to scope and it seeks information regarding contractors other than the independent contractor for whom plaintiff claims to have worked, Arthur Brother, Inc. Celanese further objects to this request because it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving the foregoing objections, Celanese on information and belief admits that it ultimately paid for insulation materials, gaskets and packings used by the independent contractors it hired, but believes such materials were generally selected, estimated and ordered by the independent contractors themselves.

REQUEST FOR ADMISSION NO. 615

Admit that Celanese employees purchased asbestos containing insulation materials that were installed by contractor employees in 1964.

RESPONSE:

Celanese objects to this request as vague, ambiguous and overly broad in that it is not properly plant at issue in this case. Celanese also objects to this request on the grounds that it is overly broad and harassing in that it is not properly limited as to scope and it seeks information regarding contractors other than the independent contractor for whom plaintiff claims to have worked, Arthur Brother, Inc. Celanese further objects to this request because it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving the foregoing objections, Celanese on information and belief admits that it ultimately paid for insulation materials, gaskets and packings used by the independent contractors it hired, but believes such materials were generally selected, estimated and ordered by the independent contractors themselves.

REQUEST FOR ADMISSION NO. 616

Admit that Celanese employees purchased asbestos containing insulation materials that were installed by contractor employees in 1965.

RESPONSE:

Celanese objects to this request as vague, ambiguous and overly broad in that it is not properly plant at issue in this case. Celanese also objects to this request on the grounds that it is overly broad and harassing in that it is not properly limited as to scope and it seeks information regarding contractors other than the independent contractor for whom plaintiff claims to have worked, Arthur Brother, Inc. Celanese further objects to this request because it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving the foregoing objections, Celanese on information and belief admits that it ultimately paid for insulation materials, gaskets and packings used by the independent contractors it hired, but believes such materials were generally selected, estimated and ordered by the independent contractors themselves.

REQUEST FOR ADMISSION NO. 617

Admit that Celanese employees purchased asbestos containing insulation materials that were installed by contractor employees in 1966.

RESPONSE:

Celanese objects to this request as vague, ambiguous and overly broad in that it is not properly plant at issue in this case. Celanese also objects to this request on the grounds that it is overly broad and harassing in that it is not properly limited as to scope and it seeks information regarding contractors other than the independent contractor for whom plaintiff claims to have worked, Arthur Brother, Inc. Celanese further objects to this request because it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving the foregoing objections, Celanese on information and belief admits that it ultimately paid for insulation materials, gaskets and packings used by the independent contractors it hired, but believes such materials were generally selected, estimated and ordered by the independent contractors themselves.

REQUEST FOR ADMISSION NO. 618

Admit that Celanese employees purchased asbestos containing insulation materials that were installed by contractor employees in 1967.

RESPONSE:

Celanese objects to this request as vague, ambiguous and overly broad in that it is not properly plant at issue in this case. Celanese also objects to this request on the grounds that it is overly broad and harassing in that it is not properly limited as to scope and it seeks information regarding contractors other than the independent contractor for whom plaintiff claims to have worked, Arthur Brother, Inc. Celanese further objects to this request because it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving the foregoing objections, Celanese on information and belief admits that it ultimately paid for insulation materials, gaskets and packings used by the independent contractors it hired, but believes such materials were generally selected, estimated and ordered by the independent contractors themselves.

REQUEST FOR ADMISSION NO. 619

Admit that Celanese employees purchased asbestos containing insulation materials that were installed by contractor employees in 1968.

RESPONSE:

Celanese objects to this request as vague, ambiguous and overly broad in that it is not properly plant at issue in this case. Celanese also objects to this request on the grounds that it is overly broad and harassing in that it is not properly limited as to scope and it seeks information regarding contractors other than the independent contractor for whom plaintiff claims to have worked, Arthur Brother, Inc. Celanese further objects to this request because it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving the foregoing objections, Celanese on information and belief admits that it ultimately paid for insulation materials, gaskets and packings used by the independent contractors it hired, but believes such materials were generally selected, estimated and ordered by the independent contractors themselves.

REQUEST FOR ADMISSION NO. 620

Admit that Celanese employees purchased asbestos containing insulation materials that were installed by contractor employees in 1969.

RESPONSE:

Celanese objects to this request as vague, ambiguous and overly broad in that it is not properly plant at issue in this case. Celanese also objects to this request on the grounds that it is overly broad and harassing in that it is not properly limited as to scope and it seeks information regarding contractors other than the independent contractor for whom plaintiff claims to have worked, Arthur Brother, Inc. Celanese further objects to this request because it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving the foregoing objections, Celanese on information and belief admits that it ultimately paid for insulation materials, gaskets and packings used by the independent contractors it hired, but believes such materials were generally selected, estimated and ordered by the independent contractors themselves.

REQUEST FOR ADMISSION NO. 621

Admit that Celanese employees purchased asbestos containing insulation materials that were installed by contractor employees in 1970.

RESPONSE:

Celanese objects to this request as vague, ambiguous and overly broad in that it is not properly plant at issue in this case. Celanese also objects to this request on the grounds that it is overly broad and harassing in that it is not properly limited as to scope and it seeks information regarding contractors other than the independent contractor for whom plaintiff claims to have worked, Arthur Brother, Inc. Celanese further objects to this request because it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving the foregoing objections, Celanese on information and belief admits that it ultimately paid for insulation materials, gaskets and packings used by the independent contractors it hired, but believes such materials were generally

selected, estimated and ordered by the independent contractors themselves.

REQUEST FOR ADMISSION NO. 622

Admit that Celanese employees purchased asbestos containing insulation materials that were installed by contractor employees in 1971.

RESPONSE:

Celanese objects to this request as vague, ambiguous and overly broad in that it is not properly plant at issue in this case. Celanese also objects to this request on the grounds that it is overly broad and harassing in that it is not properly limited as to scope and it seeks information regarding contractors other than the independent contractor for whom plaintiff claims to have worked, Arthur Brother, Inc. Celanese further objects to this request because it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving the foregoing objections, Celanese on information and belief admits that it ultimately paid for insulation materials, gaskets and packings used by the independent contractors it hired, but believes such materials were generally selected, estimated and ordered by the independent contractors themselves.

REQUEST FOR ADMISSION NO. 623

Admit that Celanese employees purchased asbestos containing insulation materials that were installed by contractor employees in 1972.

RESPONSE:

Celanese objects to this request as vague, ambiguous and overly broad in that it is not properly limited to the time period at issue in this case. Celanese further objects to this request because it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

REQUEST FOR ADMISSION NO. 624

Admit that Celanese purchased asbestos containing insulation for use by contractor employees at the Bishop facility between the years of 1959-72.

RESPONSE:

Celanese Ltd.'s Responses to Plaintiff
Fidencio Sanchez's Second Set of Requests
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Celanese objects to this request overly broad to the extent that it is not properly limited to the time period at issue in this case. Celanese also objects to this request on the grounds that it is overly broad and harassing in that it is not properly limited as to scope and it seeks information regarding contractors other than the independent contractor for whom plaintiff claims to have worked, Arthur Brother, Inc. Celanese further objects to this request because it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving the foregoing objections, see the responses to Request for Admission Nos. 610 - 623 above.

REQUEST FOR ADMISSION NO. 625

Admit that Celanese purchased asbestos containing gasket materials for use by contractor employees at the Bishop facility between the years of 1959-72.

RESPONSE:

Celanese objects to this request overly broad to the extent that it is not properly limited to the time period at issue in this case. Celanese also objects to this request on the grounds that it is overly broad and harassing in that it is not properly limited as to scope and it seeks information regarding contractors other than the independent contractor for whom plaintiff claims to have worked, Arthur Brother, Inc. Celanese further objects to this request because it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving the foregoing objections, see the responses to Request for Admission Nos. 610 - 623 above.

REQUEST FOR ADMISSION NO. 626

Admit that Celanese purchased asbestos containing packing materials for use by contractor employees at the Bishop facility between the years of 1959-72.

RESPONSE:

Celanese objects to this request overly broad to the extent that it is not properly limited to the time period at issue in this case. Celanese also objects to this request on the

grounds that it is overly broad and harassing in that it is not properly limited as to scope and it seeks information regarding contractors other than the independent contractor for whom plaintiff claims to have worked, Arthur Brother, Inc. Celanese further objects to this request because it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving the foregoing objections, see the responses to Request for Admission Nos. 610 - 623 above.

REQUEST FOR ADMISSION NO. 627

Admit that Celanese purchased asbestos containing pipe covering, including Owens-Corning and Kaylo, for use by contractor employees at the Bishop facility between the years of 1959-72.

RESPONSE:

Celanese objects to this request overly broad to the extent that it is not properly limited to the time period at issue in this case. Celanese also objects to this request on the grounds that it is overly broad and harassing in that it is not properly limited as to scope and it seeks information regarding contractors other than the independent contractor for whom plaintiff claims to have worked, Arthur Brother, Inc. Celanese further objects to this request because it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving the foregoing objections, see the responses to Request for Admission Nos. 610 - 623 above.

REQUEST FOR ADMISSION NO. 628

Admit that after purchase by Celanese, asbestos containing materials for use by contractors would be placed in the contractor warehouse.

RESPONSE:

Celanese objects to this request vague, ambiguous and overly broad to the extent that it is not properly limited to the time period and/or plant at issue in this case. Celanese also objects to this request on the grounds that it is overly broad and harassing in that it is not properly limited as to scope and it seeks information regarding contractors other than the independent contractor for whom plaintiff claims to have worked, Arthur

Brother, Inc. Celanese further objects to this request because it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Furthermore, this request is based on an improper premise and assumes facts not in evidence.

Subject to and without waiving the foregoing objections, after reasonable inquiry, the information known or reasonably obtainable is insufficient to enable Celanese to admit or deny this request.

REQUEST FOR ADMISSION NO. 629

Admit that safety equipment was a reimbursable item in contracts made with independent contractors at the Bishop facility.

RESPONSE:

Celanese objects to this request vague, ambiguous and overly broad to the extent that it is not properly limited to the time period at issue in this case. Celanese also objects to this request on the grounds that it is overly broad and harassing in that it is not properly limited as to scope and it seeks information regarding contractors other than the independent contractor for whom plaintiff claims to have worked, Arthur Brother, Inc. Celanese further objects to this request because it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving the foregoing objections, denied.

REQUEST FOR ADMISSION NO. 630

Admit that design engineering specifications were provided by Celanese to construction and maintenance contractors at the Bishop facility.

RESPONSE:

See responses to Request for Admission Nos. 500 - 510, 514 - 524, 528 - 538, 542 - 552, 556 - 566, 570 - 580, above.

REQUEST FOR ADMISSION NO. 631

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98102

Admit that Celanese obtained asbestos containing materials from Industrial Insulators for use by ABI employees.

RESPONSE:

Celanese objects to this request vague, ambiguous and overly broad to the extent that it is not properly limited to the time period and/or plant at issue in this case. Celanese further objects to this request because it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving the foregoing objections, Celanese admits that the insulation materials selected, estimated and ordered by Arthur Brothers for use at the Bishop facility during the time period relevant to this case were generally obtained by them from Industrial Insulators, often with direct advice on selection and estimation by Industrial Insulators.

REQUEST FOR ADMISSION NO. 632

Admit that Celanese furnished all insulation materials to ABI for use the Bishop facility from 1961-70.

RESPONSE:

See responses to Requests for Admission Nos. 610 - 623, above.

REQUEST FOR ADMISSION NO. 633

Admit that ABI provided day to day maintenance for the Bishop facility from 1959-1972.

RESPONSE:

See responses to Request for Admission Nos. 596 - 609, above.

REQUEST FOR ADMISSION NO. 634

Admit that between the years of 1959-1972, Celanese project managers and project engineers would have overall responsibility for getting contractor new construction projects completed.

RESPONSE:

Celanese objects to this request vague, ambiguous and overly broad to the extent that it is not properly limited to the time period and/or plant at issue in this case. Celanese also objects to this request on the grounds that it is overly broad and harassing in that it is not properly limited as to scope and it seeks information regarding contractors other than the independent contractor for whom plaintiff claims to have worked, Arthur Brother, Inc. Celanese further objects to this request because it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving the foregoing objections, Celanese admits only that its project managers were ultimately responsible for seeing that projects undertaken by independent contractors were performed on schedule, within budget and completed in a satisfactory manner. Celanese states in connection with this response that the manner, method and operative detail of accomplishing such work would have been left up to the independent contractors.

REQUEST FOR ADMISSION NO. 635

Admit that Celanese project managers and project engineers would have meeting with contractors to review construction and maintenance schedules between the years of 1969 and 1972.

RESPONSE:

Celanese objects to this request vague, ambiguous and overly broad to the extent that it is not properly limited to the time period and/or plant at issue in this case. Celanese also objects to this request on the grounds that it is overly broad and harassing in that it is not properly limited as to scope and it seeks information regarding contractors other than the independent contractor for whom plaintiff claims to have worked, Arthur Brother, Inc. Celanese further objects to this request because it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving the foregoing objections and subject to its response to Request for Admission No. 634, above, Celanese admits that its representatives would meet from time to time with upper level management of independent contractors to review scheduling matters.

REQUEST FOR ADMISSION NO. 636

Admit that Celanese project managers and project engineers would have meetings with contractors to determine when each part of a maintenance or new construction schedule would be completed.

RESPONSE:

Celanese objects to this request vague, ambiguous and overly broad to the extent that it is not properly limited to the time period and/or plant at issue in this case. Celanese also objects to this request on the grounds that it is overly broad and harassing in that it is not properly limited as to scope and it seeks information regarding contractors other than the independent contractor for whom plaintiff claims to have worked, Arthur Brother, Inc. Celanese further objects to this request because it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving the foregoing objections and subject to its response to Request for Admission No. 634, above, Celanese admits that its representatives would meet from time to time with upper level management of independent contractors to review scheduling matters.

REQUEST FOR ADMISSION NO. 637

Admit that Celanese project managers and/or and project engineers retained the power to change contractor construction and maintenance schedules.

RESPONSE:

Celanese objects to this request vague, ambiguous and overly broad to the extent that it is not properly limited to the time period and/or plant at issue in this case. Celanese also objects to this request on the grounds that it is overly broad and harassing in that it is not properly limited as to scope and it seeks information regarding contractors other than the independent contractor for whom plaintiff claims to have worked, Arthur Brother, Inc. Celanese further objects to this request because it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving the foregoing objections and subject to its response to

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Request for Admission Nos. 634 and 635, above, Celanese admits that as a matter of contract its representatives could implement overall scheduling changes applicable to projects being undertaken by independent contractors.

REQUEST FOR ADMISSION NO. 638

Admit there was no Celanese employee who was responsible for evaluating the safety of products being put into service on its facilities in 1959.

RESPONSE:

Celanese objects to this request as vague, ambiguous and overly broad in that it is not properly limited to the time period and/or plant at issue in this case. Celanese further objects to this request because it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

REQUEST FOR ADMISSION NO. 639

Admit there was no Celanese employee who was responsible for evaluating the safety of products being put into service on its facilities in 1960.

RESPONSE:

Celanese objects to this request as vague, ambiguous and overly broad in that it is not properly limited to the time period and/or plant at issue in this case. Celanese further objects to this request because it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

REQUEST FOR ADMISSION NO. 640

Admit there was no Celanese employee who was responsible for evaluating the safety of products being put into service on its facilities in 1961.

RESPONSE:

Celanese objects to this request as vague, ambiguous and overly broad in that it is not properly limited to the plant at issue in this case. Celanese further objects to this request because it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving the foregoing objections, denied as stated.

REQUEST FOR ADMISSION NO. 641

Admit there was no Celanese employee who was responsible for evaluating the safety of products being put into service on its facilities in 1962.

RESPONSE:

Celanese objects to this request as vague, ambiguous and overly broad in that it is not properly limited to the plant at issue in this case. Celanese further objects to this request because it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving the foregoing objections, denied as stated.

REQUEST FOR ADMISSION NO. 642

Admit there was no Celanese employee who was responsible for evaluating the safety of products being put into service on its facilities in 1963.

RESPONSE:

Celanese objects to this request as vague, ambiguous and overly broad in that it is not properly limited to the plant at issue in this case. Celanese further objects to this request because it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving the foregoing objections, denied as stated.

REQUEST FOR ADMISSION NO. 643

Admit there was no Celanese employee who was responsible for evaluating the safety of products being put into service on its facilities in 1964.

RESPONSE:

Celanese objects to this request as vague, ambiguous and overly broad in that it is not properly limited to the plant at issue in this case. Celanese further objects to this request because it seeks information that is neither relevant nor reasonably calculated to lead to

the discovery of admissible evidence.

Subject to and without waiving the foregoing objections, denied as stated.

REQUEST FOR ADMISSION NO. 644

Admit there was no Celanese employee who was responsible for evaluating the safety of products being put into service on its facilities in 1965.

RESPONSE:

Celanese objects to this request as vague, ambiguous and overly broad in that it is not properly limited to the plant at issue in this case. Celanese further objects to this request because it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving the foregoing objections, denied as stated.

REQUEST FOR ADMISSION NO. 645

Admit there was no Celanese employee who was responsible for evaluating the safety of products being put into service on its facilities in 1966.

RESPONSE:

Celanese objects to this request as vague, ambiguous and overly broad in that it is not properly limited to the plant at issue in this case. Celanese further objects to this request because it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving the foregoing objections, denied as stated.

REQUEST FOR ADMISSION NO. 646

Admit there was no Celanese employee who was responsible for evaluating the safety of products being put into service on its facilities in 1967.

RESPONSE:

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Celanese objects to this request as vague, ambiguous and overly broad in that it is not properly limited to the plant at issue in this case. Celanese further objects to this request because it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving the foregoing objections, denied as stated.

REQUEST FOR ADMISSION NO. 647

Admit there was no Celanese employee who was responsible for evaluating the safety of products being put into service on its facilities in 1968.

RESPONSE:

Celanese objects to this request as vague, ambiguous and overly broad in that it is not properly limited to the plant at issue in this case. Celanese further objects to this request because it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving the foregoing objections, denied as stated.

REQUEST FOR ADMISSION NO. 648

Admit there was no Celanese employee who was responsible for evaluating the safety of products being put into service on its facilities in 1969.

RESPONSE:

Celanese objects to this request as vague, ambiguous and overly broad in that it is not properly limited to the plant at issue in this case. Celanese further objects to this request because it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving the foregoing objections, denied as stated.

REQUEST FOR ADMISSION NO. 649

Admit there was no Celanese employee who was responsible for evaluating the safety of products being put into service on its facilities in 1970.

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98102

RESPONSE:

Celanese objects to this request as vague, ambiguous and overly broad in that it is not properly limited to the plant at issue in this case. Celanese further objects to this request because it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving the foregoing objections, denied as stated.

REQUEST FOR ADMISSION NO. 650

Admit there was no Celanese employee who was responsible for evaluating the safety of products being put into service on its facilities in 1971.

RESPONSE:

Celanese objects to this request as vague, ambiguous and overly broad in that it is not properly limited to the plant at issue in this case. Celanese further objects to this request because it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving the foregoing objections, denied as stated.

REQUEST FOR ADMISSION NO. 651

Admit there was no Celanese employee who was responsible for evaluating the safety of products being put into service on its facilities in 1972.

RESPONSE:

Celanese objects to this request as vague, ambiguous and overly broad in that it is not properly limited to the time period and/or plant at issue in this case. Celanese further objects to this request because it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

REQUEST FOR ADMISSION NO. 652

Celanese Ltd.'s Responses to Plaintiff
Fidencio Sanchez's Second Set of Requests
for Admission and Third Set of Requests
for Production to Defendant Celanese Ltd.

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Admit that Celanese personnel had the right to terminate contractor work if they observed an eminent hazard at the Bishop facility.

RESPONSE:

Celanese objects to this request vague, ambiguous and overly broad to the extent that it is not properly limited to the time period at issue in this case. Celanese also objects to this request on the grounds that it is overly broad and harassing in that it is not properly limited as to scope and it seeks information regarding contractors other than the independent contractor for whom plaintiff claims to have worked, Arthur Brother, Inc. Celanese further objects to this request because it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving the foregoing objections, Celanese admits that it could ask independent contractors to cease work if they were observed engaging in activities that posed an imminent and substantial risk of serious harm to person or property, but states that wherever possible it reported unsafe practices to the independent contractor's supervisors for them to take appropriate corrective action.

**SPECIFIC RESPONSES TO PLAINTIFF'S
SECOND SET OF REQUESTS FOR PRODUCTION**

REQUEST FOR PRODUCTION NO. 1

Produce all surveys, inspection reports, or data compilations concerning the Bishop facility done by David Barrett.

RESPONSE

Celanese additionally objects to this request because:

1. It fails to describe with reasonable particularity the item or category of items sought to be inspected, as required by Rule 196.1 of the Texas Rules of Civil Procedure;
2. It seeks matters that are not relevant to the subject matter of this lawsuit or reasonably calculated to lead to the discovery of admissible evidence;
3. It is unlimited as to time and/or scope;
4. It is vague, ambiguous, overly broad and unduly burdensome; and
5. It is duplicative of information sought in Plaintiff's First and Second Sets of Requests for Production.

REQUEST FOR PRODUCTION NO. 2

Produce all receiving reports for asbestos containing materials at the Bishop facility.

RESPONSE

Celanese additionally objects to this request because:

1. It fails to describe with reasonable particularity the item or category of items sought to be inspected, as required by Rule 196.1 of the Texas Rules of Civil Procedure;

2. It seeks matters that are not relevant to the subject matter of this lawsuit or reasonably calculated to lead to the discovery of admissible evidence;
3. It is not properly limited to the time period at issue;
4. It is vague, ambiguous, overly broad and unduly burdensome; and
5. It is duplicative and duplicative of information sought in Plaintiff's First and Second Sets of Requests for Production.

Subject to and without waiving these objections, see the documents previously produced to you on July 13, 1999, in Cause No. 97-8-50930-B, *Arthur Dominguez, et al. v. Owens-Corning Fiberglas, et al.*, in the 135th Judicial District Court of Victoria County, Texas, bates-labeled 000001-006430. See also the documents previously produced on September 29, 2000, in Cause No. 90G2055, *Weldon R. Moake, et al. v. Owens Corning Fiberglas, et al.*, in the 239th Judicial District Court of Brazoria County, Texas, bates-labeled 9220-10363.

REQUEST FOR PRODUCTION NO. 3

Produce all requisition orders for asbestos containing materials at the Bishop facility.

RESPONSE

Celanese additionally objects to this request because:

1. It fails to describe with reasonable particularity the item or category of items sought to be inspected, as required by Rule 196.1 of the Texas Rules of Civil Procedure;
2. It seeks matters that are not relevant to the subject matter of this lawsuit or reasonably calculated to lead to the discovery of admissible evidence;
3. It is not properly limited to the time period at issue;
4. It is vague, ambiguous, overly broad and unduly burdensome; and
5. It is duplicative and duplicative of information sought in Plaintiff's First and Second Sets of Requests for Production.

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Subject to and without waiving these objections, see the documents previously produced to you on July 13, 1999, in Cause No. 97-8-50930-B, *Arthur Dominguez, et al. v. Owens-Corning Fiberglas, et al.*, in the 135th Judicial District Court of Victoria County, Texas, bates-labeled 000001-006430. See also the documents previously produced on September 29, 2000, in Cause No. 90G2055, *Weldon R. Moake, et al. v. Owens Corning Fiberglas, et al.*, in the 239th Judicial District Court of Brazoria County, Texas, bates-labeled 9220-10363.

REQUEST FOR PRODUCTION NO. 4

Produce all purchase orders for asbestos containing materials at the Bishop facility.

RESPONSE

Celanese additionally objects to this request because:

1. It fails to describe with reasonable particularity the item or category of items sought to be inspected, as required by Rule 196.1 of the Texas Rules of Civil Procedure;
2. It seeks matters that are not relevant to the subject matter of this lawsuit or reasonably calculated to lead to the discovery of admissible evidence;
3. It is not properly limited to the time period at issue;
4. It is vague, ambiguous, overly broad and unduly burdensome; and
5. It is duplicative and duplicative of information sought in Plaintiff's First and Second Sets of Requests for Production.

Subject to and without waiving these objections, see the documents previously produced to you on July 13, 1999, in Cause No. 97-8-50930-B, *Arthur Dominguez, et al. v. Owens-Corning Fiberglas, et al.*, in the 135th Judicial District Court of Victoria County, Texas, bates-labeled 000001-006430. See also the documents previously produced on September 29, 2000, in Cause No. 90G2055, *Weldon R. Moake, et al. v. Owens Corning Fiberglas, et al.*, in the 239th Judicial District Court of Brazoria County, Texas, bates-labeled 9220-10363.

REQUEST FOR PRODUCTION NO. 5

Celanese Ltd.'s Responses to Plaintiff
Fidencio Sanchez's Second Set of Requests
for Admission and Third Set of Requests
for Production to Defendant Celanese Ltd.

98102

Produce all gate logs for the main gate for the Bishop facility for 1959-1972.

RESPONSE

Celanese additionally objects to this request because:

1. It fails to describe with reasonable particularity the item or category of items sought to be inspected, as required by Rule 196.1 of the Texas Rules of Civil Procedure;
2. It seeks matters that are not relevant to the subject matter of this lawsuit or reasonably calculated to lead to the discovery of admissible evidence;
3. It is not properly limited to the time period at issue;
4. It is vague, ambiguous, overly broad and unduly burdensome; and
5. It is duplicative and duplicative of information sought in Plaintiff's First and Second Sets of Requests for Production.

REQUEST FOR PRODUCTION NO. 6

Produce all gate logs for the ABI contractor gates for the Bishop facility for 1959-1972.

RESPONSE

Celanese additionally objects to this request because:

1. It fails to describe with reasonable particularity the item or category of items sought to be inspected, as required by Rule 196.1 of the Texas Rules of Civil Procedure;
2. It seeks matters that are not relevant to the subject matter of this lawsuit or reasonably calculated to lead to the discovery of admissible evidence;
3. It is not properly limited to the time period at issue;
4. It is vague, ambiguous, overly broad and unduly burdensome;

5. It is duplicative and duplicative of information sought in Plaintiff's First and Second Sets of Requests for Production; and
6. It is based on an improper premise and assumes facts not in evidence.

Subject to these objections, see the documents previously produced to you on July 13, 1999 in Cause No. 97-8-50,930-B, *Arthur Dominguez, et al. v. Owens-Corning Fiberglas, et al.*, in the 135th Judicial District Court of Victoria County, Texas, bates-labeled 000001-006430. See also the Arthur Brothers' contracts produced on April 14, 2000 in the *Dolezal* case.

REQUEST FOR PRODUCTION NO. 7

Produce all accounting records — including, but not limited to invoices — regarding trade organizations.

RESPONSE:

Celanese additionally objects to this request because:

1. It fails to describe with reasonable particularity the item or category of items sought to be inspected, as required by Rule 196.1 of the Texas Rules of Civil Procedure;
2. It seeks matters that are not relevant to the subject matter of this lawsuit or reasonably calculated to lead to the discovery of admissible evidence;
3. It is unlimited in time and scope; and
4. It is vague, ambiguous, overly broad and unduly burdensome.

REQUEST FOR PRODUCTION NO. 8

Produce all surveys, notes, or documents related to Kemper insurance visits to the Bishop facility.

RESPONSE

Celanese additionally objects to this request because:

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1. It fails to describe with reasonable particularity the item or category of items sought to be inspected, as required by Rule 196.1 of the Texas Rules of Civil Procedure;
2. It seeks matters that are not relevant to the subject matter of this lawsuit or reasonably calculated to lead to the discovery of admissible evidence;
3. It is unlimited in time and scope; and
4. It is vague, ambiguous, overly broad and unduly burdensome.

Subject to and without waiving the foregoing objections, any responsive still in existence and located via a reasonably diligent search have already been produced to Plaintiff - see documents bates labeled, 000242-243; 001046-1047; 001304-1305; 001388-1389.

REQUEST FOR PRODUCTION NO. 9

Produce all epidemiology studies, whether internal or published involving Celanese employees.

RESPONSE

Celanese additionally objects to this request because:

1. It fails to describe with reasonable particularity the item or category of items sought to be inspected, as required by Rule 196.1 of the Texas Rules of Civil Procedure;
2. It seeks matters that are not relevant to the subject matter of this lawsuit or reasonably calculated to lead to the discovery of admissible evidence;
3. It is unlimited in time and scope; and
4. It is vague, ambiguous, overly broad and unduly burdensome.

REQUEST FOR PRODUCTION NO. 10

Produce all studies or compilations of Celanese employees death certificates

Celanese Ltd.'s Responses to Plaintiff
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for Admission and Third Set of Requests
for Production to Defendant Celanese Ltd.

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